



**The Developments of
National Significance
(Wales) Regulations
2016 (as amended)**

**The Developments of
National Significance
(Procedure) (Wales)
Order 2016 (as
amended)**

Application by
GSC White House
Farm Ltd

PEDW Ref. CAS-
03107-C5X9W1

Land At White House
Farm and Middle Hill
Farm, Freystrop,
Pembrokeshire

Local Impact Report

Pembrokeshire County
Council

3rd July 2026

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Glossary

CEMP	Construction Environmental Management Plan
CTMP	Construction Traffic Management Plan
DNS	Development of National Significance
The Proposal	Solar Array (with a Generating Capacity Between 10MW and 49.9MW), Energy Storage Facility, Ancillary Infrastructure, And Landscaping.
EIA	Environmental Impact Assessment
ES	Environmental Statement
LDP	Local Development Plan for Pembrokeshire (Adopted 28th February 2013)
LIR	Local Impact Report
LPA	Local Planning Authority
LVIA	Landscape and Visual Impact Assessment
PCC	Pembrokeshire County Council
PCNPA	Pembrokeshire Coast National Park Authority
PEDW	Planning & Environment Decision Wales
SAB	Sustainable Drainage Systems Approving Body
SAC	Special Area of Conservation
TA	Transport Assessment
The Regulations	Town and Country Planning, Wales - The Developments of National Significance (Wales) Regulations 2016
The Order	Town and Country Planning, Wales - The Developments of National Significance (Procedure) (Wales) Order 2016

1. Introduction

- 1.1 In accordance with The Order, this LIR includes an analysis of likely impacts and an assessment of how these relate to local planning policies, a description of the planning history of the site, the identification of local designations, and recommendations for planning conditions (and, if considered necessary, planning obligations).
- 1.2 In accordance with guidance issued by PEDW, the LIR has not examined the relationship with national policy and guidance but instead is focussed specifically on establishing the degree of local impact in relation to what are considered to be the principal planning issues, having regard also to the local planning policy context. For each relevant topic, in accordance with guidance, impacts have been expressed in terms of whether they are positive, neutral or negative; with the degree of impact, where relevant, being expressed as major, moderate or minor. However, in accordance with PEDW guidance, the LIR does not contain a balancing exercise between positives and negatives, nor does it come to a conclusion on the relative merits of the development itself.

2. Summary

- 2.1 The main local effects of the Proposal during operation, once proposed mitigation and recommended planning conditions are imposed, as described in the application and in this LIR, can be summarised as moderate negative in respect of landscape character effects and visual impact. This conclusion is based upon the application as submitted with which the LPA has identified some deficiencies in the LVIA that has been undertaken, as addressed in this LIR.
- 2.2 Consequently, it cannot be concluded that the Proposal is compatible with the capacity or character of the Site or its surrounding area, contrary to criterion 1 of policy GN.1 (General Development Policy). It would also result, in places, in a significant detrimental impact on visual amenity (criterion 2 of policy GN.1) and an adverse effect on the landscape (criterion 3 of policy GN.1).
- 2.3 Having particular regard to the nature of the proposed development and its location within the open countryside, the Proposal cannot reasonably be regarded as being appropriate to the local character or the landscape context, contrary to criterion 2 of policy GN.2 (Sustainable Design). For the same reasons, the Proposal also fails to accord with policy SP 16 (The Countryside).
- 2.4 The LPA acknowledges that the conflict identified above must be weighed against whether the proposed scheme is 'environmentally acceptable' for the purposes of Policy GN.4 (Resource Efficiency and Renewable and Low-Carbon Energy Proposals), which aims to encourage the further development of renewable energy. This assessment is closely linked to the broader national policy objective of delivering renewable energy. The

planning balance associated with that objective is not a matter for the LPA to consider within this Local Impact Report.

- 2.5 Whilst the ES addresses other topics, none of these are considered likely to give rise to local adverse effects during operation, subject to the embedded mitigation within the application and the planning conditions that are recommended. These other effects can be regarded as, at worst, neutral subject to the delivery of proposed mitigation and the imposition of the recommended planning conditions.
- 2.5 Impacts during construction and decommissioning can be satisfactorily mitigated subject to relevant planning conditions being imposed.

3. Proposed Development

- 3.1 The Proposal is appropriately described at ES Chapter 03 (Scheme Description and Alternatives), paragraphs 3.1-3.5.

4. Publicity

- 4.1 By Acceptance Notice dated 5th June 2026, PEDW required the site notices (copies of which were included with that letter) to be erected in at least one place on or near the land to which the application relates for a period of not less than 30 days. Site notices were erected at three locations on 10th June 2026. The site notices were displayed at the same locations that were used by the applicant for site notices at the statutory pre-application consultation stage. The site notices remained for at least 30 days. Therefore, the LPA submits that they have complied with Regulation 19 of The Order.
- 4.2 Appendix A1 includes confirmation of site notice locations and photographs of the site notices at each location. Therefore, the LPA submits that they have complied with Regulation 25 (2) (c) of The Order.
- 4.3 The LPA can also confirm that the documents required to be placed on the planning register, and described in PEDW Acceptance Notice dated 5th June 2026, were placed on the planning register within the required 5 working days. Therefore, the LPA submits that they have complied with Regulation 20 of The Order.

5. Site & Surroundings

- 5.1 The LPA concur with the site description that is provided at 2.1 of the Design and Access Statement.
- 5.2 The Site is not located within any internationally, European or nationally designated ecological sites. There are no local designations within the application site.
- 5.3 The designations that are located near the application site are described in this LIR.

6. Planning History

- 6.1 There is no history in terms of relevant planning applications relating to the Site.

7. Local Planning Policy

- 7.1 The LDP was adopted on 28th February 2013 and is the Development Plan for the area of Pembrokeshire that is outside of the Pembrokeshire Coast National Park. There are a number of policies in the LDP that are relevant in the consideration of the application. Paragraph 1.19 of the LDP records that 'many of the Plan policies are inter-related and several may relate to any individual development proposal. It is therefore important that the Plan is read as a whole and used in conjunction with national policy and guidance and local SPG'.
- 7.2 The LDP Strategy is designed to deliver the Vision for Pembrokeshire, meet the objectives of the LDP and respond to the issues identified to deliver sustainable development. The strategy focuses on enabling development in accordance with the identified objectives. The Strategy is implemented through development(s) that comply with 16 strategic policies; these are then supported by a number of general policies (and allocations). The strategic policies that are of most relevance are described below.
- 7.3 The LDP recognises that the County has significant potential to provide energy from renewable sources and aims to encourage further use of renewables to produce energy in order to contribute to meeting government targets. Policies SP 1 (Sustainable Development) and SP 16 (The Countryside) both aim to ensure that sustainable development is achieved whilst protecting the landscape, and natural and built environment of Pembrokeshire and adjoining areas.
- 7.4 In terms of the vision and objectives of the LDP, PEDW is referred to Chapter 4 of the LDP. The LDP Strategy is designed to deliver the Vision for Pembrokeshire, meet the objectives of the LDP and respond to the

issues identified to deliver sustainable development. It was derived from national and regional policy principles (albeit now superseded by Future Wales – the National Plan 2040 and Planning Policy Wales (Edition 12)) and an evaluation of economic, social and environmental factors and the key issues and characteristics that make Pembrokeshire unique.

7.5 Policy SP 1 is an overarching strategic policy which requires all development to demonstrate how positive economic, social and environmental impacts will be achieved and adverse impacts minimised. The main strategic drivers in relation to the development subject to this application are the obligations and national planning policy relating to the need for a greater proportion of energy production to be delivered from renewable sources. Delivering such development has wider social and economic advantages. The potential for positive social and economic effects (that accord with SP 1) are addressed elsewhere in the LIR, as are the potential environmental impacts. The Proposal would be consistent with the objectives of policy SP 1.

7.6 Policy SP 16 seeks to protect the landscape and natural and built environment of Pembrokeshire and adjoining areas. The text to the policy recognises that “Pembrokeshire and its wider context, has a range of important environments and landscapes” and has an outstanding natural and historic environment. It further recognises that “there are many challenges in maintaining a strong natural and historic environment whilst ensuring that other key objectives in the Plan such as providing housing or building on the County’s strategic location for energy and port related development are met”.

General Policies

7.7 Chapter 6 of the LDP sets out detailed policies. Of most relevance to the DNS Proposal are policies GN.1 (General Development Policy), GN.2 (Sustainable Design), GN.4 (Resource Efficiency and Renewable and Low-Carbon Energy Proposals), GN.22 (Prior Extraction of the Mineral

Resource), GN.37 (Protection and Enhancement of Biodiversity) and GN.38 (Protection and Enhancement of the Historic Environment).

- 7.8 Policy GN.1 provides a framework for the evaluation of potential development impacts. In respect of visual and landscape effects, policy GN.1 states that development will be permitted where the nature, location, siting and scale of the proposed development is compatible with the capacity and character of the site and the area within which it is located; and it would not adversely affect landscape character, quality or diversity; including the special qualities of the PCNP.
- 7.9 Policy GN.2 (Sustainable Design), amongst other matters, requires development to be “of a good design which pays due regard to local distinctiveness and contributes positively to the local context”, is “appropriate to the local character and landscape/townscape context”, incorporates a resource efficient, climate responsive, flexible and adaptable design.
- 7.10 Policy GN.4 supports development which enables the supply of renewable energy through environmentally acceptable solutions. The development would clearly enable the supply of a greater proportion of renewable energy that is explicitly supported by reason of policy GN.4 but, in order to be acceptable, this must be achieved by “environmentally acceptable solutions”.
- 7.11 In combination, policies GN.1, GN.2 and GN.4 support renewable energy developments through environmentally acceptable solutions. These policies should be accorded equal weight. Assessment against policies GN.1 and GN.2 needs to be weighed against establishing whether the scheme is ‘environmentally acceptable’ for the purposes of policy GN.4 that ‘aims to encourage further use of renewables’. The accompanying text to Policy GN.4 states that landscape impact, individually and cumulatively, will clearly be a material consideration in the evaluation of renewable energy

proposals. Establishing the level of impact including direct visual effects and impact on landscape character & specific designations is therefore critical.

- 7.12 Policy GN.3 (Infrastructure and New Development) provides a framework for securing necessary infrastructure improvements that are generated by new development. This policy relates to planning obligations normally to be secured by legal agreement. The LPA can identify no requirement for planning obligations that would need to be delivered by way of a Section 106 legal agreement.
- 7.13 The Site is situated within an area of mineral resource and policy GN.22 requires the prior extraction of any economic reserves wherever appropriate in terms of economic feasibility and environmental and other planning considerations.
- 7.14 Policy GN.37 requires development to demonstrate a positive approach to maintaining (and, wherever possible, enhancing) biodiversity; “development that would disturb or otherwise harm protected species or their habitats ... will only be permitted in exceptional circumstances where the effects are minimised or mitigated through careful design, work scheduling or other appropriate measures”.
- 7.15 Policy GN.38 (Protection and Enhancement of the Historic Environment) requires that any development that affects sites and landscapes of architectural and/or historical merit or archaeological importance, or their setting, will only be permitted if their character and integrity is protected or enhanced. Considered further in the detailed assessment that follows.
- 7.16 The LDP can be found at:
<https://www.pembrokeshire.gov.uk/adopted-local-development-plan>

Supplementary Planning Guidance

7.17 The following adopted LDP SPG is relevant:

- Renewable Energy SPG (October 2016)
- Biodiversity SPG (May 2014)

These documents can be found at:

<https://www.pembrokeshire.gov.uk/adopted-local-development-plan/ldp-supplementary-planning-guidance>

Replacement Local Development Plan

7.18 Submission of Pembrokeshire County Council's replacement LDP (LDP 2) to Welsh Government was completed on 10th October 2025. The independent Examination commenced on 15th October 2025. On 8th May 2026, PEDW called an LDP 2 Exploratory Meeting on nutrient-sensitive Special Areas of Conservation, which took place on 16th June 2026. The formal outcome of the Exploratory Meeting is awaited, but initial indications are that, subject to completion of some further actions, the Examination will continue. If that is so, then PCC anticipates that PEDW will, in due course, set dates for several LDP 2 hearing sessions, which may take place later in 2026. The preparation of the PEDW Inspectors' report will follow on from the hearing sessions. PCC will not be able to adopt LDP 2 until that report is to hand. In the meantime, the current LDP (adopted in 2013) remains in force.

Landscape Character Assessment

7.19 The draft Landscape Character Assessment forms part of the evidence base for LDP2. It has also been subject to consultation with a view to

adopting it as Supplementary Planning Guidance to the current Local Development Plan (adopted 2013). As described in the Welsh Government's Development Management Manual, the evidence to support the policies in an emerging LDP can be used as a material consideration when making decisions.

8.0 Visual & Landscape

Site description and landscape context

- 8.1 The Site lies fairly centrally within Landscape Character Area 09: Johnston Lowlands as defined in the Landscape Character Assessment (refer paragraph 7.19). This is described as a gently undulating lowland landscape comprising a series of shallow ridges and valleys, with farmland dominated by improved pasture enclosed by hedgebanks and tree cover. Scattered farmsteads and settlement clusters are connected by a network of rural lanes, while the area is also influenced by infrastructure including the A4076 and A477, overhead lines and occasional energy developments. Whilst wind turbines were an early addition to the renewable energy landscape, solar farms are a more recent addition.
- 8.2 The eastern part of the LCA, closer to the Western Cleddau and Daugleddau estuary and the Pembrokeshire Coast National Park, is noted to be more tranquil and rural in character, with greater enclosure provided by landform and woodland.
- 8.3 The LPA's Landscape Character Assessment for this LCA recognises the potential for renewable energy development, but advise that such development should be sited discreetly, avoid adverse effects on the setting of the National Park, and be integrated within the landscape through retention of hedgerows, woodland and field patterns.
- 8.4 To the east, the Pembrokeshire Coast National Park Landscape Character Area 28: Daugleddau is characterised by its wooded estuarine landscape,

with enclosed river valleys, strong tree cover and a high scenic and perceptual value. This landscape is generally well contained, with views often limited by landform and vegetation.

- 8.5 In overall terms, the receiving landscape is of a rural, agricultural character with a reasonably strong existing field pattern and vegetation framework, but with some existing influence from infrastructure and energy development. It is not a wild or undeveloped landscape, but it does exhibit local variation in tranquillity and sensitivity, particularly in areas closer to the National Park.

Visual baseline and receptors

- 8.6 Visual receptors in the study area comprise a mix of users of the local road network, public rights of way, recreational areas, and nearby residential properties. These vary in sensitivity depending on the nature of the activity and the value of the view.
- 8.7 The LVIA assesses visual effects from nine representative viewpoints, including locations within the Pembrokeshire Coast National Park, local bridleways, roads, and settlement edges.
- 8.8 Views within the wider area are typically influenced by the gently undulating landform and the presence of a well-defined network of hedgerows, trees and woodland. In many locations, these features limit or filter views, particularly at lower elevations and along public rights of way which are often enclosed by vegetation.
- 8.9 Longer range views are available from more open locations, including parts of the National Park and higher ground, although even in these cases visibility of the Site is often reduced by intervening landform and vegetation.

Assessment of effects

- 8.10 The LVIA concludes that landscape and visual effects arising from the Proposal would generally be localised and not significant, with the

exception of effects on a limited number of residential receptors. This overall pattern is reflected in the assessment of viewpoints, where the majority of effects are identified as negligible to moderate adverse and not significant. In broad terms, this approach is considered reasonable.

Visual Effects

- 8.11 The Site is influenced by existing infrastructure and development, including overhead lines and nearby solar development, and is contained in many views by a combination of undulating landform and a well-defined network of hedgerows and trees. As a result, visibility of the proposed development is often filtered or limited, particularly in longer range views and along enclosed sections of public rights of way. However, some aspects of the visual assessment are considered to understate the experience of receptors at certain locations.
- 8.12 At Viewpoint 2 (Langford Road, Johnston), the assessment identifies receptors as road users of low sensitivity. While this reflects the primary function of the road, the LPA considers that this viewpoint also represents a more varied group of receptors, including nearby residents, pedestrians and regular users associated with Johnston Community Primary School. These include parents, schoolchildren and staff, for whom the view may form a repeated and familiar part of the day. In addition, the view is likely to be locally valued, with a wider outlook across farmland towards the Preseli Hills in the distance and therefore has a higher degree of visual amenity than suggested in the assessment.
- 8.13 The LVIA (at para 4.7.70) refers to users of recreational and educational facilities but fails to consider effects on these other receptor groups in the assessment, confining it instead to just road users (travelling at speed). The assessment also fails to recognise that the more distant part of the view is of National Park designation. The LPA considers the susceptibility of the receptor, the value of the view, and therefore the sensitivity should be re-evaluated with a view to increasing their value. The assessment (Appendix 4-5) recognises the proposed development “ . . WAA is partly visible in the

middle distance alongside existing solar panels at North Tenement solar farm . . .” As this is within the same field of view the LPA considers cumulative effects are likely to arise, although there is no mention of this within the assessment.

- 8.14 At Viewpoint 3 (Johnston Skate Park) a similar point arises where the assessment places emphasis on active recreational use and identifies low sensitivity. The Council notes (from mapping and Figure 4.41 to 4.49 Viewpoint photography) that this location also functions as an area of public open space, including seating oriented towards the view. This suggests that the appreciation of views could be part of the experience at this location, and that susceptibility, value and sensitivity should be re-evaluated, as for VP 2. It is notable from the VP photography that the Proposal would be very prominent across a considerable angle of the view. The LPA consider some cumulative effects are also likely to arise from this location.
- 8.15 At Viewpoint 6 (Freystrop Recreation Park), the assessment again focuses on the use of play facilities in determining low sensitivity. However, the park includes areas of open, managed grassland and seating to the west of the chosen camera position, which allow for more open views towards the western area of the Site. The importance of these views to users of the park is therefore likely to be greater than suggested in the LVIA.
- 8.16 At Viewpoint 8 (A4076 Johnston) it is assessed in relation to road users. The LPA consider this is reasonable, although note the name of the nearest house to be Hill View, referring to the landform of the proposed development site and it is a representative viewpoint of what nearby properties in Johnston would experience. The development would extend up to the horizon and be prominent in the view.
- 8.17 Elsewhere, the assessment identifies moderate adverse effects at a number of viewpoints, including along bridleways near Lower Freystrop (Viewpoints 5 and 9) and along Pembroke Road (Viewpoint 7). These generally reflect situations where more open views are available towards parts of the proposed solar arrays. The LPA considers that these effects

are appropriately identified, and that they would be noticeable locally, even where they do not reach the threshold of significance as defined within the LVIA.

- 8.18 The LVIA considers a range of residential receptors around the site, including properties at Johnston, Freystrop, Moorland Road and Lower Freystrop. In most cases, effects arise where views are available towards either the WAA or EAA solar array areas, and it is inferred at 4.7.88 that visual effects are not possible from both from a single location.
- 8.19 For the majority of residential properties, the LVIA identifies effects in the range of Small to Medium magnitude, resulting in minor to moderate adverse effects, which are not significant. These outcomes are generally associated with filtered or partial views of the development, often influenced by intervening hedgerows, trees, buildings or garden vegetation.
- 8.20 A number of properties in closer proximity to the site, east of the WAA have moderate adverse but are still assessed as not significant. However, the LVIA identifies significant visual effects for a small number of residential receptors. These are concentrated at Garlandstone and properties at the eastern end of Moorland Road (Freystrop). At these locations, residents are identified as experiencing Moderate to Major adverse effects at both Year 0 and Year 10. These effects arise from more open and elevated views towards the eastern array (EAA), where the development would form a noticeable and prominent element within the view. Whilst mitigation planting would provide some additional filtering over time, the LVIA concludes that effects at these locations would remain significant. There is however some confusion in arriving at these conclusions. Between the text of Para 4.7.83 and Table 4-9 it is unclear of the effects to the residential properties of Moorland Road in Freystrop. The text offers some confusion whether the effects are from the WAA or the EAA and suggests the magnitude is medium, however the table (bottom page 61) suggests small or negligible, and it then goes on (on page 62) to reflect the text (medium magnitude, high susceptibility) consequently having a significant effect. The LPA consider some clarification of these details is required.

- 8.21 Overall, the pattern of effects for residential receptors is therefore localised, with most properties experiencing limited or filtered views, but with a small number of properties experiencing more pronounced and significant visual change. Although it is not referred-to specifically, the LPA considers that the residential properties of Johnston between VP 2 and VP 3 and near VP 8 are likely to experience the same effects as mentioned above, and that the VP locations are representative, but that their assessment requires more robust examination, especially with regard to susceptibility of receptors, value of view, sensitivity and cumulative effects.
- 8.22 The assessment demonstrates that visual effects would largely be contained and localised, with limited effects on the wider landscape. However, at certain locations, particularly where views are valued as part of daily experience or recreational use, the sensitivity of receptors and the experience of visual change appears to be understated. The most notable adverse effects would be experienced locally, particularly by nearby residents and people at the northeast fringe of Johnston.

Landscape Effects

- 8.23 The LVIA identifies that the Proposal would result in a moderate adverse effect on the character of LCA 09: Johnston Lowlands, which is not considered to be significant. This conclusion is based on a finding of medium landscape sensitivity and a medium magnitude of change, with effects largely contained within the northern part of the LCA and reducing with distance.
- 8.24 In general terms, this conclusion is reasonable. The receiving landscape is influenced by existing infrastructure, including roads, overhead lines and nearby solar development, and the field pattern and vegetation structure provide a degree of enclosure which limits the wider influence of the proposals. The underlying characteristics of the landscape, including its pastoral land use and hedgerow framework, would remain intact.

- 8.25 However, some aspects of the assessment are simplified. The LVIA identifies the value of the landscape as low, although it also acknowledges features such as a network of public rights of way, locally distinctive hedgebanks, woodland structure and proximity to the Pembrokeshire Coast National Park. These factors suggest that landscape value is not uniform and may be higher in some areas, particularly towards the eastern part of the LCA.
- 8.26 The assessment draws attention to the influence of existing infrastructure in reducing sensitivity, e.g. where the overhead power lines run through both areas. While this is relevant in parts of the LCA, the landscape is varied, and areas of more rural or tranquil character remain. The introduction of solar development in two separate areas, in combination with existing solar development nearby, would result in a noticeable localised change in landscape character, even if this does not extend across the wider LCA.
- 8.27 This change would be compounded by the extent of structures, other than the solar panels themselves, that are proposed. These include five battery storage containers, three power conversion systems and one storage container (all with dimensions 6058 x 2438 x 3200 high), acoustic fencing that appears to be 4 metres high (no further details provided), two buildings in south-west corner of BESS compound (are these the same buildings as the control buildings within the substation compound?), and a control building of a maximum height of up to 4.2m. A water tank also appears to be proposed but no details are provided. The electricity sub-station would have external plant of maximum height 8m, a retaining wall (of height 2.5m?) and its own control room of maximum height 5m.
- 8.28 The change in character will be particularly evident in the north-eastern quadrant of the village of Johnston between Langford Road and the A4076, where a more open pastoral landscape has an attractive distant backdrop of the 'borrowed landscape' of the Preseli Hills, within Pembrokeshire Coast National Park. It is reasonable to assume that this is considered to be a

valuable view by locals, and the imposition of the additional WAA panels will be a noticeable change in character.

- 8.29 The LVIA identifies the overall effect on landscape character as adverse, while also concluding that mitigation and enhancement measures would result in beneficial effects. Whilst mitigation may provide localised landscape and biodiversity benefits, the LPA considers that this does not necessarily constitute a beneficial change to landscape character.
- 8.30 Overall, the LPA considers that the LVIA provides a reasonable assessment of landscape effects, although landscape value and the extent of localised change appear to be understated in parts. The principal effects would be local in extent and would not materially alter the wider character of the Johnston Lowlands LCA.

Effects on the Pembrokeshire Coast National Park.

- 8.31 The National Park comes to within 400m of the EAA at a point where its area forms a slight projection out from the main body of the Cleddau estuary. The ZTV indicates however that all nearby NP areas will be screened by landform up to a point approximately 2km away where Viewpoint 1 represents views from a public bridleway along the Western Cleddau. The LVIA identifies this as a high sensitivity receptor, which is appropriate given the location within the National Park.
- 8.32 The assessment concludes that the Proposal would result in a negligible level of visual effect at this viewpoint, with only very limited and distant visibility of part of the eastern array. The western array would not be visible. This conclusion reflects the extent of intervening landform and vegetation, which largely contain views towards the Site, and the low profile of the development. It is reliant on the existing vegetation, and the effects of proposed mitigation planting becoming effective over the course of 10 years. The aspect of the panels would be side-on and visually less imposing, however.

- 8.33 The LPA considers this assessment to be reasonable. Based on the information provided, the development would be barely perceptible in the wider landscape from this location and would not materially affect views experienced within this part of the National Park. It is assumed that the PCNPA will submit their own representation.

Glint and Glare

- 8.34 A Glint and Glare Assessment has been undertaken and is provided as Vol 4 Appendix 2-5. The assessment focuses on receptors within 1 km of the site, including residential properties and road users. It concludes that, due to the orientation of the panels, glint and glare effects would not affect receptors located to the north of the arrays.
- 8.35 Of the 40 residential receptors assessed, the majority (28) would experience no impact, with the remaining 12 identified as experiencing a low level of impact. No impacts are predicted for road receptors.
- 8.36 The assessment attributes this outcome to the screening effect of existing vegetation and proposed landscape mitigation and does not propose any additional mitigation measures beyond those already included in the landscape strategy. Overall, the assessment indicates that glint and glare effects would be limited and acceptable.

Cumulative effects

- 8.37 This is a complex area of assessment for which guidelines offer considerable broad interpretation for practitioners. The LVIA has adopted an approach (within Volume 2 Chapters 2 and 4), of only assessing those similar types of development under construction, approved development awaiting construction or schemes awaiting determination within the planning system. The LPA consider that this area of the assessment is

weak (Vol 2, Ch 4 LVIA 4.8) and consider the first paragraphs are unclear of the adopted approach. The LPA considers it a failing to assess the potential cumulative effects that may arise in conjunction with the existing North Tenement solar farm that lies only 100m to the northwest of WAA. The LVIA suggests it is considered in the Baseline and various assessments but barely makes mention of potential effects. The LPA note that within GLVIA3 and Government guidelines on cumulative assessment consideration of existing development is an option.

- 8.38 Whilst the cumulative effects on landscape character have been confined to the study area the LPA note that just outside the study area to the south-west are two other extant solar farms, and that a question of capacity of this local area to support solar farms needs consideration. This has not however been considered as part of the assessment.

Conclusions

- 8.39 The LVIA concludes that the Proposal would give rise to a moderate adverse effect on the character of the Johnston Lowlands landscape character area. This effect is not identified as significant. The assessment notes that the development would introduce a noticeable change at the Site itself, but that this would be localised and would not alter the overall key characteristics of the wider landscape. In general terms, this conclusion is considered reasonable although the LPA consider the capacity of the landscape in the vicinity of Johnston is nearing being reached.
- 8.40 The Site is influenced by existing infrastructure, including overhead lines, roads and nearby solar development, and the presence of field boundaries and vegetation limits the wider influence of views. The separation of the development into two areas and the use of existing landscape features to provide containment are also relevant factors.
- 8.41 In relation to visual effects, the LVIA identifies that effects on most receptors, including users of the local road network and public rights of way, would not be significant. This reflects the generally contained nature of

views, with filtering provided by hedgerows, trees and local landform. However, the assessment identifies significant adverse effects for a small number of residential receptors, notably at Garlandstone and at the eastern end of Moorland Road. These effects are assessed as Moderate to Major Adverse and remain significant over the operational life of the development.

- 8.42 The LVIA relies in part on existing and proposed hedgerow and tree planting to reduce visual effects. While this approach is standard practice, the effectiveness of mitigation planting is dependent on establishment and growth, and therefore its influence would increase over time. Significant effects for some receptors would persist at Year 10 and it is acknowledged that until the screening afforded by planting is achieved, visual impacts will occur to varying degrees elsewhere.
- 8.43 The methodology has been reasonably employed, and the language is clear to follow. It is felt however that some of the assessment processes have not been broad enough in their scope and require further examination, as it is felt greater impacts are likely to receptors in the northeast quadrant of Johnston.
- 8.44 The Proposal would give rise to an overall moderate adverse effect on the landscape and visual amenities for the reasons set out above. Consequently, it cannot be concluded that the Proposal is compatible with the capacity or character of the Site or its surrounding area, contrary to criterion 1 of policy GN.1. It would also result, in places, in a significant detrimental impact on visual amenity (criterion 2 of policy GN.1) and an adverse effect on the landscape (criterion 3 of policy GN.1).
- 8.45 Having particular regard to the nature of the proposed development and its location within the open countryside, the Proposal cannot reasonably be regarded as being appropriate to the local character or the landscape context, contrary to criterion 2 of policy GN.2. For similar reasons, the Proposal also fails to comply with policy SP 16.

9. Other Matters

Nature Conservation

- 9.1 Comments of the Council's Ecologist are enclosed as Appendix A2. With the required mitigation (and enhancement) to be assured by planning conditions relating to the Construction Environment Management Plan (CEMP) and LEMP (Landscape Ecological Management Plan), the Proposal would accord with the relevant criteria of policy GN.1 as well as policy GN.37.
- 9.2 It is noted that PEDW are the competent authority for the purposes of the Habitats Regulations Assessment.

Historic Environment

- 9.3 The LPA raises no issues in respect of the conclusions of the Archaeological Desk-Based Assessment and Heritage Impact Statement submitted in support of the application. Comments of the LPA's archaeological advisors, Heneb, are included as Appendix A3. Note the recommended planning condition in respect of compliance with the submitted Outline Archaeological Mitigation Strategy. Subject to the inclusion of this as an approved document as part of the relevant planning condition, the Proposal would be compliant with Policy GN.38 (Protection and Enhancement of the Historic Environment).

Socio-Economic Effects

- 9.4 Pembrokeshire's economy has three main pillars: energy, agriculture and tourism. The Proposal would produce green energy that would add to the growing number of renewable energy projects that are being attracted to Pembrokeshire because of existing infrastructure and supply chains. These

projects are beginning to achieve a momentum that is attracting further interest in potential investment in Pembrokeshire and South West Wales. This fits into both PCC's economic development strategy and the Swansea Bay City Deal where energy is one of the key themes. The DNS Proposal is compliant with policy GN.4 because it enables the supply of renewable energy through environmentally acceptable solutions that is also supported by policies SP 1 (Sustainable Development) and SP 16 (The Countryside). Whilst job creation at the local level may be negligible, there is the potential for positive social and economic effects at the local level which would accord with the objectives of the LDP including the aim of delivering sustainable development albeit that much of the benefit of the DNS Proposal would be at the macro scale in addressing the effects of pollution and climate change.

Transportation

- 9.5 The local transportation effects are described by the comments of the County Highway Authority that are included as Appendix A4. It is recommended that, should planning permission be forthcoming, planning conditions relating to the proposed access and highway improvement works, the agreement of a CTMP and a scheme to deal with deliveries via Abnormal Indivisible Loads (AIL) are incorporated. With the required mitigation to be assured by planning conditions, the Proposal is unlikely to result in a detrimental highway impact (criterion 5 of policy GN.5) albeit a minor negative impact cannot be discounted during the construction phase.

Best & Most Versatile Agricultural Land

- 9.6 The LPA defer to the Welsh Government Soil, Peatland and Agricultural Land Use Planning Unit on this matter. Policy relevant to BMV land is included at national level within Future Wales. The appropriateness of any planning conditions, such as a Soil Resources and Management Plan, is therefore deferred.

Pollution

- 9.7 Other than during the construction phase, the Proposal would not give rise to any significant effects in relation to noise or air quality. Any adverse effects during the construction phase can be satisfactorily mitigated by the inclusion of a planning condition to agree a CEMP. A pre-cautionary condition to deal with any unforeseen contamination is also recommended. The ES has adequately addressed matters in relation to the potential for glint and glare.
- 9.8 The Proposal would accord with policy GN.1. Of the relevant criteria relating to pollution, the Proposal is compatible with the site and area, it would not result in a significant detrimental impact on local amenity (albeit there would be a minor negative effect during the construction phase but this effect has been assessed as not significant subject to compliance with an approved CEMP), there would be no unacceptable harm to health and safety and water quality would not be significantly affected.

Mineral Resource

- 9.9 The Site is situated within an area of mineral resource where the prior extraction of any economic reserves must be achieved, where appropriate, prior to commencement of development to accord with policy GN.22. Having regard to the nature of the Proposal including its reversibility/decommissioning, as well as environmental issues that may preclude the acceptability of prior extraction in this instance, the Proposal would not conflict with the objectives of policy GN.22.

Water & Drainage

- 9.10 The LPA considers that by virtue of the fact that the construction area having drainage implications appears to be in excess of 100 square metres, the proposed works would require SAB approval. Surface water drainage details would thus be approved at that stage. The LPA raises no issues in

relation to the submitted Flood Consequences Assessment. It does not appear that any foul waste is proposed.

- 9.11 Ordinary watercourses must not be filled in, culverted, or the flow impeded in any manner, without prior written consent under Section 23 Land Drainage Act 1991 as amended by the Flood and Water Management Act 2010. Consent is also required to alter a culvert in a manner that would be likely to affect flow of an ordinary watercourse, and for temporary as well as permanent works. Under no circumstances should any structure be built over ordinary watercourses or within 3 metres from the top of bank of any watercourse, or within 3 metres of a culverted watercourse, without the prior agreement of PCC. This will ensure that access can be maintained for future maintenance. Any existing watercourses, drains, ditches and outfalls which are disturbed shall be suitably intercepted and redirected, to ensure that the existing local drainage network is not adversely affected. The developer must ensure that any necessary consents have been obtained before undertaking such works.

Former Coal Mining

- 9.12 The representation of the Coal Authority at the statutory pre-application stage is noted including the recommendation that intrusive site investigations are carried out on site in order to establish if shallow coal workings are present and to locate the recorded mine entries. The Coal Authority's statutory consultation response to the planning application will inform any requirement for a planning condition(s).

Common Land

- 9.13 The comments of the LPA's Common Land Officer are enclosed as Appendix A5. It is requested that the applicant addresses the matter that is raised therein.

10. **Planning Conditions**

10.1 As referenced within the LIR, the following planning conditions are recommended should planning permission be approved (in addition to the standard time limit for commencement of development).

1. The development shall be carried out in accordance with the following approved plans and documents:

General Arrangement (Dr.No. 5076-01-03 Rev.E)
Solar Photovoltaic Frame, Panels and String Inverters (Dr.No. 5076-01-04)
Transformer Station (Dr.No. 5076-01-05)
Control Building (Dr.No. 5076-01-06 Rev.A)
Spares Container (Dr.No. 5076-01-07 Rev.A)
DNO Control Room (Dr.No. 5076-01-08 Rev.A)
Substation Compound Elevations (Dr.No. 5076-01-09 Rev.A)
BESS Compound Elevation (Dr.No. 5076-01-10)
BESS and Substation Layout Plan (Dr.No. 5076-01-11 Rev.B)
Substation Compound Fencing (Dr.No. 5076-01-12 Rev.A)
Site Fencing, Access Track, and CCTV (Dr.No. 5076-01-13)
Typical Cable Trench (Dr.No. 5076-01-14)
Bridge Design (Dr.No. 5076-01-15)
Landscape Ecological Management Plan (December 2025 5076-LEMP)
Outline Archaeological Mitigation Strategy (December 2025)

Reason: To ensure that the development is carried out in accordance with the approved plans and drawings submitted with the application.

2. The planning permission hereby granted shall endure for a period of 40 years from the date when electricity is first exported from the solar photovoltaic farm on a commercial basis excluding testing (the "First Export Date"). Written confirmation of the First Export Date shall be sent to the local planning authority within one month of the First Export Date.

Reason: To comply with the terms of the application.

3. No later than 12 months before the expiry date of the planning permission hereby granted (as defined in condition 2), a decommissioning and site restoration scheme shall be submitted to and approved in writing by the local planning authority. The scheme shall include:
 - Details of the removal of all the solar arrays and the surface elements of the development (including any foundations or anchor systems); and

- A Decommissioning Environmental Management Plan (DEMP) informed by appropriate survey work.

Decommissioning of the site shall be carried out in accordance with the approved decommissioning and site restoration scheme.

Reason: To comply with the terms of the application and to be in accordance with Policies GN.1, GN.2, GN.4 and GN.37 of the Pembrokeshire County Council Local Development Plan and Policy 18 of Future Wales.

4. If any part of the solar farm hereby permitted fails to produce electricity for supply to the grid for a continuous period of 6 months, a scheme shall be submitted to the local planning authority for its written approval within 3 months of the end of that 6 month period for the repair or the removal of the solar farm. Where repairs or replacements are required, the scheme shall include a proposed programme of remedial works. Where removal of the solar farm is required, the scheme shall include the same details required under the decommissioning condition (condition 3) of this permission. The repair or removal scheme shall thereafter be implemented in full accordance with the approved details and timetable.

Reason: To ensure that the replacement of components is appropriately controlled and to ensure the solar farm beneficially generates electricity or is otherwise removed to the benefit of the character and appearance of the area.

5. No development shall commence the colour of all structures and buildings have been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.

Reason: In the interest of the character and appearance of the area and in accordance with Policies GN.1 and GN.2 of the Pembrokeshire County Council Local Development Plan and Policy 18 of Future Wales.

6. No development shall commence until a Construction and Environmental Management Plan (CEMP) has been submitted to, and approved in writing by, the local planning authority. The CEMP shall include the following matters:
 - i. Construction methods: details of materials used in construction; details of how any waste generated will be managed;
 - ii. General Site Management: details of the construction programme including timetable, details of site clearance; details of site construction drainage site set-up plan detailing how sensitive receptors will be protected from harm e.g. fencing, containments areas, appropriately sized buffer zones between storage areas (of spoil, oils, fuels, concrete

- mixing and washing areas) and any watercourse or surface drain;
- iii. Biodiversity Management during construction: details of habitat retention and protection; invasive species management; species and habitat protection, avoidance, mitigation and enhancement measures (as detailed within the Extended Phase 1 Survey),
 - iv. CEMP Masterplan: details of the extent and phasing of development; location of landscape and environmental resources; design proposals and objectives for integration and mitigation measures;
 - v. Control of Nuisances: details of restrictions to be applied during construction hours including timing, duration and frequency of work;
 - vi. Resource Management: details of fuel and chemical site storage and containment; details of waste generation and its management; details of the consumption of water and wastewater;
 - vii. Pollution Prevention;
 - viii. Protection of nearby watercourses;
 - ix. Details of the persons and bodies responsible for activities set out in the CEMP and emergency contact details. For example, contract manager, site manager, contractors, visitors, site environmental advisor, landscape clerk and ecological clerk of works to ensure construction compliance with approved plans and environmental regulations;
 - x. Construction phase lighting; and
 - xi. Tree & hedgerow protection measures

The construction of the development shall accord with the approved CEMP.

Reason: In the interests of pollution prevention and biodiversity in accordance with Policies GN.1 and GN.37 of the Pembrokeshire County Council Local Development Plan and Policies 9 and 18 of Future Wales.

7. Prior to the installation of any lighting beyond that required for the construction phase, full details shall be submitted to and approved by the local planning authority. The development shall be carried out in accordance with the approved details.

Reason: To protect the biodiversity interests of the site and visual amenity, and in accordance with Policies GN.1 and GN.37 of the Pembrokeshire County Council Local Development Plan and Policy 18 of Future Wales.

8. No development shall commence until the highway improvements works shown in Drawing 5076-ATR02, including localised carriageway widening works and passing

bays on Moorland Road, are completed in full and made available for use in accordance with details that shall be first submitted to, and approved in writing by, the Local Planning Authority.

Reason: In the interest of highway safety, in accordance with Policy GN.1 of the Pembrokeshire County Council Local Development Plan and Policy 18 of Future Wales.

9. Prior to the first operation of the proposed development, the visibility splays shown on Drawing 5076-D02 shall be provided and thereafter maintained free from any obstruction exceeding 0.6m in height above the level of the adjoining carriageway.

Reason: In the interest of highway safety, in accordance with Policy GN.1 of the Pembrokeshire County Council Local Development Plan and Policy 18 of Future Wales.

10. Prior to the first operation of the proposed development, the approved site accesses serving the Western Array Area (WAA) and the Eastern Array Area (EAA) shall be completed in accordance with the approved plans and thereafter retained during the construction phase. Upon completion of the construction phase and within 6 months, the site accesses shall be returned to standard access widths suitable for LGV vehicles and private vehicles.

Reason: In the interest of highway safety, in accordance with Policy GN.1 of the Pembrokeshire County Council Local Development Plan and Policy 18 of Future Wales.

11. Prior to commencement of development, a Construction Traffic Management Plan (CTMP) shall be submitted to, and approved in writing by, the local planning authority. The CTMP shall include, in addition to those details required of the CEMP, detailed plans of an appropriate non-motorised user routing, signage and management plan, including Driver Awareness and Vulnerable Road User Protocol; detailed plans of the proposed passing-bays, construction layout and materials. All construction work shall be undertaken in accordance with the approved CTMP.

Reason: In the interest of highway safety, in accordance with Policy GN.1 of the Pembrokeshire County Council Local Development Plan and Policy 18 of Future Wales.

12. Prior to the commencement of development, full details of the levels and any associated earthworks and/or retaining structures shall be submitted to and approved in writing by the local planning authority.

The development shall be carried out in accordance with the approved details.

Reason: In the interest of the character and appearance of the area, and in accordance with Policies GN.1 and GN.2 of the Pembrokeshire County Council Local Development Plan and Policy 18 of Future Wales.

13. Prior to the commencement of development, full details of all landscaping (informed by the Proposed Landscape Strategy included as part of the application), to include an implementation and retention plan, shall be submitted to, and approved in writing by, the local planning authority. Development shall be carried out in accordance with the approved details (and in accordance with a timeframe to be included in the submitted details).

Reason: To protect biodiversity interests and visual amenity, and to ensure good design, in accordance with Policies GN.1 and GN.37 of the Pembrokeshire County Council Local Development Plan and Policy 18 of Future Wales.

14. If evidence of contamination is found in or around the development area, development must not proceed until a report on potential contamination of the site has been prepared by an appropriately qualified person and submitted to and approved in writing by the local planning authority. This report shall include a phased investigation approach, incorporating risk assessment, to identify the extent of contamination and any measures required to remediate the site, including post-development monitoring. Where remediation works are required, the development shall not be occupied/used until a Validation Report, to show that the works have been satisfactorily carried out, has been submitted and approved in writing by the Local Planning Authority.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors. In accordance with Policy GN.1 of the Pembrokeshire County Council Local Development Plan and Policy 18 of Future Wales.

Appendix 1 to LPA Local Impact Report – Site Notices

PEDW Ref:	CAS-03107-C5X9W1
Address:	Land at White House Farm, Moorland Road and Middle Hill Farm, Freystrop, Haverfordwest, SA62 4LD.
Proposal:	Construction and Operation of a solar energy generating station and Battery Energy Storage System (BESS)

3 No. Site Notices posted 10th June 2026 in locations that correspond to those locations where site notices were posted by the applicant at the statutory pre-application consultation stage.





Appendix 2 to LPA Local Impact Report – Nature Conservation

PEDW Ref:	CAS-03107-C5X9W1
Address:	Land at White House Farm, Moorland Road and Middle Hill Farm, Freystrop, Haverfordwest, SA62 4LD.
Proposal:	Construction and Operation of a solar energy generating station and Battery Energy Storage System (BESS)

Designated sites

The following protected sites are located at the stated distances from the Site:

- Milford haven Waterway SSSI / Pembroke Marine SAC 0.88km east
- Hook Wood SSSI, ASNW 1.07KM east
- Cleddau Rivers SAC 3.02km north
- Scoveston Fort SSSI 4.5km south
- Slebech Stable Yard Loft, Cellars & Tunnels SSSI / Pembrokeshire Bat Sites and Bosherton Lakes SAC 7.7km north-east
- Yerboston Tops SAC 9.56km south-east

The Site is within the Nitrate Neutrality Zone of the Pembroke Marine and Milford Inner SAC. The Site is hydrologically connected to the Pembroke Marine SAC. The proposed development of the solar farm will unlikely impact the SAC in terms of general use, but consideration of the impact on the SAC through construction and post construction methodologies should be considered. The potential impact from a fire within the BESS and run off into the SAC has been considered for this application and methods to reduce any impact on the SAC have been proposed. A CEMP has been highlighted and should be conditioned to cover all aspects of potential pollution. A HRA will likely be required to identify and mitigate against any impact on the SAC. It is welcomed that an 8m buffer zone will be imposed and maintained an all watercourses connected to or adjacent the Site.

Bats

A Comprehensive suite of bat surveys has been undertaken including.

- Desk study with records from the West Wales Biodiversity Information Centre (WWBIC)
- Transect surveys- x4 surveys between April and July
- Automated Activity surveys (static monitoring) seven deployments for a minimum of five days each deployment.

The results concluded that the majority of the bat activity on the site was associated with boundary features used for commuting and foraging. The majority of the bats detected were common and soprano pipistrelle bats. However there were a number of detections of Annex II species including Lesser Horseshoe, Greater Horseshoe and Barbastelle. In total sixteen species/species groups of bats were recorded in association with onsite, and adjacent, habitats. Although the development will have limited lighting a sensitive lighting strategy will be required to ensure bats using the site are not impacted by the development.

Boundary features are largely expected to be retained with small lengths (not more than 10m) being removed purely for access. Mitigation is proposed in the landscape plan to overcome the removal of the hedgerows. A 5m buffer will be established around retained boundary features to protect these features from development works and reduce the impact of species using the habitats.

Wintering Birds

Surveys were conducted using a combination of guidelines outlined by the British Trust for Ornithology (BTO) for Common Bird Census (CBC) and BTO Wintering Farmland Bird Survey methodology. Three surveys were undertaken between October and December 2023 with the report dated 2024.

Section 6.4.7 of PPW Edition 12 states that planning authorities should refer to up to date ecological survey information. The CIEEM advice note dated April 2019 on the lifespan of ecological reports and surveys suggests that any surveys which are 18 months to 3 years old would require a professional ecologist to undertake a site visit to determine if any material changes to the site would require further survey work to be undertaken. The ecological survey submitted in support of this application was

over 2 years old. The data submitted was comprehensive and a new survey is unlikely to reveal significantly different results. However, a new survey may be required to establish whether or not the development would meet the duty to maintain and enhance biodiversity under the Environment (Wales) Act 2016.

30 species of birds were recorded onsite including four Schedule 1 species and seven Section 7 species.

Breeding birds

42 bird species were recorded onsite during the surveys, which were conducted using methodology developed by the British Trust for Ornithology (BTO). Three surveys were undertaken after assessment of the onsite habitats suitable for supporting breeding birds. The surveys were undertaken between April and July 2025. Of the 42 bird species recorded within a 2km radius of the site, 18 appear on one or more of the following and are hereafter referred to as 'notable species':

- Schedule 1 of WCA;
- BoCC Red or Amber lists;
- Section 7 of the Environment (Wales) Act 2016 (EWA S7); and/or
- Local Biodiversity Action Plan

The majority of the species recorded were consistent with using the boundary features (hedgerows and trees), Skylark and Meadow Pipit were the only species that exhibited breeding behaviour within the main development grassland area, with Meadow Pipit confirmed as breeding.

Other species were confirmed as breeding within the boundary features including robin, blackbird, great spotted woodpecker and a range of common tit, finch and warbler species. This assemblage included a range of notable species including common whitethroat, linnet, willow warbler, coal tit, goldcrest, song thrush, bullfinch, magpie and dunnock. Common and widespread species were also recorded including blue tit, wren, robin, nuthatch, jay, chiffchaff and blackbird. Magpie, Linnet and Dunnock were confirmed breeding within the hedgerows.

Skylark were concentrated in the Western area of the Site and were also noted as being an over wintering bird. A 5m buffer will be established around retained boundary features.

The greatest concern is the loss of the grassland areas and the potential impact on skylarks as a result. The Green Infrastructure Statement and Landscape Plan indicate that new grassland areas will be created onsite as well as enhancement for the retained grassland areas post construction.

Mitigation, compensation and methodologies for protecting and reducing impact on wintering and breeding birds will be covered in an Ecological Management Plan.

Vegetation clearance will be undertaken outside of the main breeding season (March -September) under the supervision of an ecologist. Clearance works will also be covered in a Construction Environment Management Plan (CEMP).

It is considered that sufficient survey effort has been undertaken and proposals for mitigation, compensation, habitat retention and creation have been presented and the likely impact on wintering or breeding birds has been reduced as much as possible.

Otter

An Otter survey was undertaken on 2025 concluding in December of that year. The onsite and adjacent watercourses were searched for evidence/ presence of otters. A potential holt was observed on the southern bank of the watercourse that runs alongside the southern boundary of the western area. No other evidence was found.

Water vole

Water vole surveys were undertaken during the otter surveys concluding in December 2025. Evidence searches were conducted up to 5m from the banks of the onsite/adjacent waterbodies. The survey was undertaken outside of the recommended survey period however, the habitats were assessed for suitability for supporting water vole. There were no records for water vole within 2km of the site, and it is considered that the surveys undertaken observed sufficient areas suitable for supporting water vole in appropriate conditions. An 8m buffer will be established around all onsite watercourses which will be sufficient to protect against any impact on water vole or otters should they be present.

Details of methodologies during construction and vegetation clearance to protect riparian mammals are to be included in the Ecological Management Plan and Construction Environment Management Plan (CEMP).

Invertebrates

No Invertebrate's survey was undertaken on the Site; the lack of a survey was due to the onsite habitats being mostly species poor modified grassland and not indicative with an assemblage of invertebrates. In place of the field survey a desk study was undertaken comparing identified plants species onsite and the likely food source for specific invertebrates and records from WWBIC.

The onsite habitats are to be retained and therefore should retain the expectant invertebrates onsite. Emorsgate 3 and 8 seed mixes have been recommended to provide a diverse range of plant species across the site and around boundary features which is welcomed.

Further to the species expected to be on site and records held at WWBIC it is locally known that Northmoor Common located between the south-west of the EAA and North-east of the WAA has Marsh Fritillary butterfly recorded on the common. It is requested that Devils Bit Scabious (*Succisa pratensis*) food source of the Marsh Fritillary butterfly be included in the sowing of the Emorsgate 3 in the areas of the site (south-west of the EAA and North-east of the WAA) to provide connectivity from the common onto the solar farms to potentially expand the range of this rare and protected butterfly.

Badger

A badger and field signs of badger were observed in the EAA. No setts were observed during any of the site visits, however, badger is a mobile species and could encroach onto the site and build a sett in suitable areas at any time. Given the accessibility of the Site, the onsite habitats and adjacent habitats it is likely that badgers would use the site for foraging and commuting.

In order to protect badgers that may be onsite or use the site for commuting or foraging, measures including additional daily checks of the site, Precautionary Working Measures and lighting and noise mitigation will be included in the CEMP.

Dormouse

No dormouse or evidence was found onsite, and no records exist and are unlikely to be present. A 5m buffer is to be established around all retained boundary features where dormice may be present. Hedgerow removal is to be checked and supervised by a suitably qualified ecologist. Any dormouse or evidence found works are to stop and NRW consulted.

Amphibians and Reptiles

Precautionary working measures are to be implemented as per the LEMP and covered in the CEMP.

Invasive species

Control and management of the Japanese Knotweed found onsite will be undertaken as per the details in the LEMP. An Invasive Non-Native Species Management Strategy will be developed for the site.

Fencing

The site will be protected by deer stock fencing. Mammal gates have been proposed for the fencing. It is recommended that the mammal gates are of a size 250mm x 200mm to accommodate badger access through the fence.

LEMP

The presented LEMP is acceptable, and it is recommended that the LEMP and its contents are implemented in full.

Pembrokeshire County Council
County Hall
Haverfordwest
Pembrokeshire
SA61 1TP

25th June 2026

Dear [REDACTED]

re: 25/0880/NS Land at White House, Moorland Road and Middle Hill, Pembroke Road, Freystrop.

Thank you for your email regarding consultation on Development of National Significance - Construction and operation of a solar energy generating station, Battery Energy Storage System (BESS) etc on land at White House, Moorland Road and Middle Hill, Pembroke Road, Freystrop.

In our capacity as your archaeological advisors, we have checked its details against the regional Historic Environment Record (HER), a database that currently holds over 75,000 core records of archaeological and historic significance. The portion of these records relating to Pembrokeshire has been adopted by resolution of your Authority for the purposes of the Town and Country Planning (General Permitted Development) Order 1995.

The proposed development site was archaeologically evaluated in 2025 through a *Desk-based Assessment and Heritage Impact Statement* (Renewable Planning Consultancy Ltd) and a geophysics survey (TigerGeo Limited) Post-medieval activity relating to coal mining was confirmed to be present in the southern area. There was no evidence of mining in the northern area and here the geophysics recorded several anomalies of potential archaeological interest, including a sub-circular feature.

These anomalies were further investigated through evaluation trenching (fieldwork by Henneb-Dyfed, interim report by Allen Archaeology) This revealed potentially significant prehistoric activity including a probable ring-ditch and burnt mound.

Following discussion with the Principal Archaeologist at RPC, the archaeological consultants for the scheme, we agreed an Archaeological Mitigation Strategy (AMS) and this document (Report Number: RPC002-AR03. December 2025) has been submitted in support of the consultation. This includes a requirement for a second stage of trenching across the remainder of the site and flexibility in the development design/layout post consent, with options including preservation *in situ* and/or mitigatory fieldwork where necessary. We consider the scope and objectives of this AMS to be appropriate to mitigate the impacts of the proposed development on the historic environment.

We recommend that an **archaeological condition** should be attached to any forthcoming planning consent, in line with Planning Policy Wales (2024) and TAN 24: The Historic Environment (2026), to ensure that the recommended archaeological mitigation is adhered to.



Henneb

THE TRUST FOR WELSH
ARCHAEOLOGY

DYFED

YMDDIRIEDOLAETH
ARCHAEOLEGOL CYMRU

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**Rheoli
Datblygu**
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Llandeilo
Sir Gaerfyrddin
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Each stage of work outlined in the AMS will require the preparation and approval of a WSI and all aspects of the archaeological work should be carried out to the relevant Standard and Guidance of the Chartered Institute for Archaeologists (CIfA).

We hope that this is of assistance but please do not hesitate to contact us again should you require further information.

Yours sincerely

[Redacted signature block]

Mike.ings@heneb.org.uk

Cadeirydd / Chair: Dr Carol Bell PSG / CEO: Richard Nicholls
Cwmni Cyfyngedig (1198990) ynghyd ag Elusen Gofrestredig (504616) yw'r
Ymddiriedolaeth
The Trust is both a Limited Company (1198990) and a Registered Charity (504616)
Formerly: Dyfed Archaeological Trust – gynt: Ymddiriedolaeth Archaeolegol Dyfed

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Appendix 4 to LPA Local Impact Report – Transportation

PEDW Ref:	CAS-03107-C5X9W1
Address:	Land at White House Farm, Moorland Road and Middle Hill Farm, Freystrop, Haverfordwest, SA62 4LD.
Proposal:	Construction and Operation of a solar energy generating station and Battery Energy Storage System (BESS)
Road No:	C3007, ZU6071

Site and Context

The application site is located to the north and west of Freystrop Cross and comprises two distinct development parcels: the Western Array Area (WAA) and the Eastern Array Area (EAA). The two areas are separated by a minimum distance of approximately 225 metres and are linked by an underground cable route extending approximately 1.7 kilometres along Moorland Road and Pembroke Road. Collectively, the development area extends to approximately 56.6 hectares.

The WAA is situated to the west of Moorland Road, north-east of Johnston and west of Freystrop Cross. Access to this area is provided via the existing White House Farm access on Moorland Road. The EAA is located north of Freystrop Cross and south of Lower Freystrop, with access taken directly from Pembroke Road.

There are no Public Rights of Way (PRoWs) crossing either development parcel. However, Public Footpath PP21/3/1 runs adjacent to the northern extent of the WAA along Moorland Road, whilst Public Footpath 21/9 extends east-west in proximity to the eastern boundary of the EAA on the opposite side of Pembroke Road. Both routes are understood to be regularly used by local residents, including dog walkers and equestrians, and therefore represent receptors that may experience interaction with construction traffic during the development phase.

Construction and operational traffic associated with the development is expected to access the site primarily via the strategic highway network through Haverfordwest. Vehicles would likely route via the Merlin's Bridge Roundabout before travelling south-west along Pembroke Road to access both the WAA and EAA. As such, the principal transport effects of the development would be focused on Pembroke Road and Moorland Road in the vicinity of the site accesses.

Access Arrangements

Access to the Western Array Area (WAA) would be taken from the existing access serving White House Farm, which connects to two existing hardstanding tracks within the site. The principal gated farm access is approximately 6.3 metres wide and is capable of accommodating all construction traffic, including larger vehicles and HGVs. A secondary access track is located immediately to the north, providing access towards Mount Pleasant. This track is approximately 3.5 metres wide at its junction with the highway, narrowing to approximately 2.4 metres at several pinch points. Whilst this route benefits from existing access rights to Mount Pleasant, it is anticipated that the majority of construction traffic would utilise the main White House Farm access due to its superior width and geometry.

The WAA access (PP/21/31/1) is taken directly from the county highway ZU6071 (Moorland Road). Moorland Road is an unclassified road subject to a 20mph speed limit. A formal footway with street lighting is provided along the first 150 metres of the route between Pembroke Road and Moorland

Road. Beyond this point, pedestrian provision becomes more informal, comprising intermittent frontage footways and grass verges on the southern side of the carriageway. Although Moorland Road principally serves residential properties, it also provides access to an established haulage operation at Fair Hill Farm. Consequently, local residents are likely to be accustomed to sharing the highway environment with larger vehicles and to walking either on the carriageway edge or within the informal footway network where necessary.

For approximately 381 metres between Pembroke Road and the property known as Hill Croft, there are regular opportunities for pedestrians, wheelchair users, cyclists and equestrians to step clear of the carriageway and utilise verges or other areas of refuge when vehicles pass. Beyond Hill Croft, Moorland Road adopts a more rural character, with no dedicated pedestrian facilities between this location and White House Farm. In this section, the carriageway is generally bounded by mature vegetation and private property accesses. Street lighting remains present along this section of the route.

Visibility splays of 2.4m x 25m are required at the WAA access and can be achieved within the existing highway boundary. Drawing 5076-D02 demonstrates that enhanced visibility splays of 2.4m x 40m are achievable in both directions from the access. Some routine management of vegetation growth within the northern visibility splay may be necessary to maintain adequate visibility over time.

Pembroke Road, located approximately 960 metres east of the WAA access at its junction with Moorland Road, forms the principal route serving both the WAA and EAA. Through the village of Freystrop, Pembroke Road is subject to a 20mph speed limit and provides the primary connection to the wider highway network.

Access to the EAA is taken from an existing field access located north of Middle Hill Farm, opposite the Slate Centre. The access is approximately 13.3 metres wide and is therefore capable of accommodating construction traffic without modification. At this location, Pembroke Road is subject to a 40mph speed limit. Visibility splays have been demonstrated at 2.4m x 94.7m to the north and 2.4m x 104.81m to the south, reflecting the recorded 85th percentile vehicle speeds in each direction. The available visibility is therefore considered appropriate for the nature and scale of traffic anticipated during the construction phase.

Upon completion of the construction phase for each array, there would no longer be a requirement for the site accesses to retain their enlarged construction-phase dimensions. During the operational phase, access to the development is anticipated to be limited primarily to Light Goods Vehicles (LGVs) and occasional maintenance-related traffic, resulting in substantially lower traffic demands than those experienced during construction.

Accordingly, it would be appropriate for the temporary hardstanding and widened access areas required to facilitate construction traffic to be removed following completion of the works. The accesses should then be reinstated to widths commensurate with their operational requirements, thereby reducing the extent of hard surfacing within the site entrances. Any areas of hardstanding removed should be restored and replanted with appropriate landscaping or biodiversity enhancement measures to secure environmental benefits and integrate the accesses more effectively into the surrounding rural landscape.

Traffic Data and Traffic Surveys

The submitted Transport Statement (December 2025, 5076-TS01) has been submitted by the applicant and contains details with regards to the existing highway network, HGV routing, collision statistics, ATC (Automated Traffic Counts) and proposed trip generation with regards to the construction and operation.

Automatic Traffic Count (ATC) surveys were undertaken on Pembroke Road immediately north (Site 1) and south (Site 2) of the proposed EAA access between 29 June 2025 and 5 July 2025. The survey results indicate that vehicle speeds in this location exceed the posted 40mph speed limit. Recorded 85th percentile speeds were 48.3mph at Site 1 (southbound) and 50.8mph at Site 2 (northbound), suggesting that a significant proportion of drivers travel above the signed speed limit.

Traffic flow data indicates that Pembroke Road carries an average of 5,369 two-way vehicle movements over a 24-hour period, including 431 HGV movements (Table 3.1 – Survey Daily Vehicle Movements, TS). This demonstrates that the route already accommodates a relatively high volume of traffic, including a notable proportion of larger vehicles.

During the weekday AM peak period (08:00–09:00), when traffic demand is typically at its highest, a total of 445 two-way vehicle movements were recorded, including 53 HGV movements. Traffic volumes remain strong throughout the day, with the PM peak exhibiting a higher southbound flow. During this period, 536 two-way vehicle movements were recorded, including 43 HGV movements. The survey data therefore indicates that Pembroke Road experiences established traffic flows and regular HGV activity, particularly during commuter periods, providing important context when considering the scale of additional construction traffic associated with the proposed development.

Traffic surveys undertaken on Moorland Road between 25 November and 1 December recorded relatively low levels of vehicular traffic, with an average daily flow of 49 two-way vehicle movements, together with an average of 19 two-way HGV movements per day. The surveys also identified regular use of the route by non-motorised users, including an average of 37 two-way pedestrian movements, five two-way cyclist movements and two two-way equestrian movements per day (Table 3.2, TS).

The highest level of vehicular activity was recorded on Friday 28 November, when 68 two-way light vehicle movements were observed. When all highway users are considered, including HGVs, pedestrians, cyclists and equestrians, a total of 144 two-way movements were recorded on that day. The survey data also indicates a change in travel patterns at weekends, with pedestrian and equestrian activity increasing whilst vehicular traffic levels reduce slightly in comparison with weekday conditions.

During the network peak periods, pedestrian and cyclist activity remained relatively modest. The highest level of activity during the AM peak period equated to four two-way pedestrian and cyclist movements within a single hour. A higher level of usage was recorded during the PM peak period, with a maximum of 10 two-way pedestrian and cyclist movements observed during the evening peak on Tuesday 25 November (Table 3.4, TS).

Vehicular activity was similarly more pronounced during the PM peak period. The highest combined total of light vehicle and HGV movements recorded within a peak hour occurred on Friday 28 November, when 12 two-way vehicle movements were observed. Whilst traffic volumes are generally low, the survey results demonstrate that Moorland Road functions as a shared rural route used by motorists, pedestrians, cyclists and equestrians throughout the day, a factor which should be carefully considered when assessing the impact of construction traffic associated with the proposed development.

Data from the traffic surveys indicates that vehicular traffic flows within the existing highway network are low when compared with the traffic volumes recorded on Pembroke Road and other routes within the wider highway network. However, the survey results also demonstrate that Moorland Road performs an important local function as a shared-use rural route, regularly accommodating pedestrians, cyclists and equestrians in addition to vehicular traffic.

Whilst the absolute number of vulnerable road users recorded during the survey period was relatively modest, their presence is proportionately significant given the low traffic environment and

the limited provision of dedicated pedestrian infrastructure along much of the route. Consequently, even relatively small increases in vehicle movements associated with the construction phase of the development have the potential to alter the character of the route and increase interactions between construction traffic and vulnerable road users.

Particular consideration should therefore be given to the management of construction traffic along Moorland Road, including driver awareness, use of passing places, adherence to agreed routing arrangements and appropriate measures to ensure the continued safety and convenience of pedestrians, cyclists and equestrians throughout the construction period.

Routing

The preferred access route for all construction traffic associated with the development is via the A4076 at Merlin's Bridge Roundabout, continuing along Pembroke Road before turning onto Moorland Road to access the site (Image 3.1, TS).

Merlin's Bridge Roundabout experiences notable congestion during both the AM and PM peak periods, with traffic queues regularly occurring on several of its approaches and extending along Freeman's Way towards Salutation Square. Pembroke Road is particularly affected during the morning peak, with northbound traffic flows experiencing delays as vehicles seek to exit onto the A4076. The operation of this approach is constrained by the absence of signal control, which can result in longer waiting times during periods of heavy traffic demand.

Traffic conditions are further influenced by the geometric constraints present at the junction of Pembroke Road and Magdalen Street, where the carriageway narrows significantly due to the close proximity of adjacent buildings. This creates a localised pinch point which can restrict vehicle movement and contribute to congestion, particularly during peak travel periods.

Notwithstanding these constraints, an assessment of the surrounding highway network indicates that there are limited realistic alternatives for routing construction traffic to and from the site. This reflects the relatively constrained nature of the highway network within Pembrokeshire and the need to utilise the principal routes connecting Haverfordwest with the application site. Consequently, the proposed routing strategy via the A4076, Pembroke Road and Moorland Road is considered to represent the most practical and appropriate route for construction traffic and is capable of accommodating the forecast vehicle movements associated with the development.

Turning Movements – Pembroke Road Junction

The TS identifies some queueing at the Pembroke Road junction during both the AM and PM peak periods. However, the reported maximum queue length of 100 vehicles on the New Road approach turning left onto Pembroke Road (Table 3.5, TS) appears anomalous and may represent a typographical or data recording error. This figure is substantially higher than all other recorded queue lengths at the junction and is inconsistent with the reported AM and PM peak period observations, which indicate maximum queue lengths of 9 vehicles and 5 vehicles respectively on the same approach. In the absence of any explanation within the TS, such as a temporary incident, obstruction or abnormal traffic event, the 100-vehicle queue should be treated as an outlier and afforded limited weight in the assessment of junction performance.

The junction of Targate Road, Moorland Road and Pembroke Road experiences slightly higher levels of turning traffic and associated queueing. Over the survey period, the greatest observed queue length was 26 vehicles for right-turning traffic from Targate Road onto Pembroke Road, whilst a maximum queue of 12 vehicles was recorded for left-turning movements from Targate Road onto

Pembroke Road. Notwithstanding these observations, queue lengths during the network peak periods were considerably lower. No measurable queueing was recorded during the AM peak period, whilst a maximum queue of three vehicles was observed for the right-turn movement during the PM peak period (Table 3.6, TS).

The survey data indicates that the operation of the junction is dominated by through traffic movements along Pembroke Road in both the northbound and southbound directions, which account for the majority of daily and peak-hour traffic flows. Whilst some intermittent queueing occurs on the minor arms of the junction, the recorded delays are generally limited in extent and duration. The available evidence therefore supports the conclusion presented within the TS (Paragraph 3.6.53) that the junction currently operates satisfactorily during both the AM and PM peak periods, with no indication of significant capacity constraints under existing conditions.

Trip Generation

The TS states that trip generation forecasts are limited to the construction phase only (Para 4.1.2, TS), with operational traffic being limited to maintenance requirements, and approximately once per month, serviced by LGV.

The Construction Phase is expected to take 12 months (Para 4.2.1, TS), with the highest level of construction being undertaken within a six-month period (28 weeks in total), consisting of:

- Week 1 – 8: Site Setup, access track and fencing
- Week 9 – 28: Solar Farm and BESS construction
- Week 29 – 52: Commissioning period.

The construction programme is expected to operate over a 5.5-day working week, comprising Monday to Friday (08:00–18:00) and Saturday (08:00–13:00), with no works undertaken on Sundays or Bank Holidays. The Transport Statement (TS) confirms that there would be no routine movements between the two development sites, with all deliveries and construction staff directed to the appropriate access point for the relevant array. With the exception of any specialist equipment requiring relocation between sites, this approach would minimise unnecessary vehicle movements on the local highway network (Paragraph 2.8.1, TS).

A first-principles approach has been adopted to assess construction traffic generation, with forecast traffic distributed equally between the two sites. In transport planning terms, a first-principles assessment considers the fundamental requirements of the proposed development and the practical needs of the construction process, rather than relying solely on comparisons with other developments or established traffic patterns. In this case, the assessment is based on the anticipated construction methodology and the resources required to facilitate the works.

During the pre-application process, it was indicated that peak construction activity across the entire scheme would generate up to 671 two-way (1,248 two-way total across entire 52 week period) HGV movements between Weeks 9 and 28 of the construction programme (Table 5.1, TS). Spread across this 19-week period, this equates to approximately 35 two-way HGV movements per week, or around 6.4 two-way movements per working day. This represents the typical level of HGV activity expected during the main construction phase. HGV activity during the first eight weeks of construction is forecast to be marginally higher, averaging approximately 13 two-way movements per day.

While the TS states that 'it is anticipated that some construction staff will participate in a car share' (Para 5.4.3, TS) this has been indicated at a split of 80% single occupancy, 20% shared car use.

Construction-related staff trip generation across the entire scheme is estimated at 891 two-way vehicle movements per week during the peak construction period (Weeks 9–28), when the workforce is expected to reach a maximum of 90 personnel. Assuming a worst-case scenario in which all 90-construction staff are present on site and travel patterns reflect the 80/20 car-sharing split set out within the TS, this equates to approximately 162 two-way staff vehicle movements per day, with a higher total of 891 two-way staff movements per week (Table 5.3, TS).

The TS states that “*total construction traffic generation will be split between the two alternative array areas (WAA and EAA). It is assumed that 67% of construction traffic will arrive at the WAA and 33% will arrive at the EAA*” (Paragraph 5.6.1, TS). Applying this distribution to staff travel demand results in approximately 113 two-way staff vehicle movements per day associated with the WAA and 55 two-way staff vehicle movements per day associated with the EAA during the peak construction period.

These figures represent a robust worst-case assessment, as they assume the maximum anticipated workforce is present throughout the peak construction phase and that staff travel demand occurs consistently across the working week.

On this basis, during the peak construction period (Weeks 9–28), combined construction staff and HGV movements are expected to generate approximately 113 two-way vehicle movements per day via Moorland Road serving the WAA, and approximately 55 two-way vehicle movements per day via Pembroke Road serving the EAA. These figures represent the total construction traffic demand associated with both staff travel and HGV movements across the development (Table 5.5, TS).

Of the 113 two-way vehicle movements (both construction-staff and HGV) associated with the WAA, only six two-way movements per day are attributable to HGV traffic. Consequently, HGV activity is not considered to be the principal transport-related consideration arising from the development. Instead, the dominant source of traffic demand is the arrival and departure of construction personnel, which accounts for the majority of daily vehicle movements.

The Transport Statement (TS) indicates that the average working day would extend over a 10-hour period (08:00–18:00) (Paragraph 5.2.2, TS). If the forecast 113 two-way vehicle movements were distributed evenly across the working day, this would equate to an average of 11.3 vehicle movements per hour, or approximately one vehicle movement every five minutes. In practice, however, traffic flows are unlikely to be evenly distributed, with construction staff arrivals and departures expected to be concentrated around shift start and finish times, resulting in more pronounced peak periods.

The highest concentration of traffic is expected to occur immediately before the start of each shift. Assuming construction staff work 8-hour shifts, peak arrival periods would likely occur between 07:30–08:00 for an 08:00 shift start and between 09:30–10:00 for a 10:00 shift start.

Of the 90-construction staff anticipated on site, it is assumed that 50% (45 staff) would arrive during each peak arrival period. Consequently, up to 45 vehicles could arrive within the 30-minute period preceding the relevant shift start time. This would equate to an average arrival rate of 1.5 vehicles per minute, or approximately one vehicle every 40 seconds, during the peak arrival periods at the WAA site. While some car sharing is likely, that has already been accounted for within the TS total construction numbers arrived at in Para 2.5 (TS).

Outside of these peak arrival times, the majority of the working day is likely to be restricted to HGV movements and any deliveries required but also accounted for in the overall trip generation figures (as set out in Para 2.7.3), which states that ‘*the peak 113 two-way movements per day within weeks 9-28 is inclusive of delivery related movements and staff trips*’.

Vehicle traffic flows of one vehicle every 40 seconds along Moorland Road, outside the key AM Peak Network Hours (08:00-09:00) can be tolerated on the public highway given that traffic flow is heading in the opposite tidal direction of traffic moving into Haverfordwest and that the programme is for a 19-week total maximum. While this is likely to be noticeable to residents on Moorland Road, compared with existing baseline traffic movements, the level of movements associated with the proposed development does not present a significant risk in terms of road safety, within the context of the proposed development and immediate highway network.

Collision Data

A review of collision data from the STATS19 database indicates that there has been one recorded slight injury collision at the junction of Pembroke Road, New Road and Moorland Road, which occurred in 2021. No additional injury collisions have been recorded at this junction or along Moorland Road itself.

The Transport Statement (TS) also undertakes an assessment of collision history across the wider highway network, extending to Merlin's Bridge Roundabout and including Dredgeman's Hill (A4076). This analysis identifies a total of eight slight injury collisions, three serious injury collisions, and no fatal collisions over the period from 2020 to 2025 (Image 3.10, TS).

The Highway Authority has raised no further concerns in relation to the recorded collision data. Overall, the existing collision record does not indicate any underlying safety issues that would be exacerbated by the proposed development. Any increase in traffic associated with the scheme can be appropriately managed through standard construction traffic management measures, ensuring that highway users are adequately informed of increased vehicle movements within the local area.

CTMP

Besides the construction of the arrays, an electrical connection (cable route) will be required to link the WAA and EAA via an underground cable. This will run approximately 1km along Moorland Road and on the north-south Pembroke Road for 700m. Traffic management will be required during this installation period along both Moorland Road and Pembroke Road, should any single-lane or full road closures be required. This can be obtained under a S50 License from Pembrokeshire County Council.

Vehicles proposed to be utilised for the construction phase of the site are indicated to be articulated HGV measuring 16.5m in length and 8 wheel-tipper trucks (Para 3.3.5, TS). The TS notes that in order to minimise potential impacts on the local highway network, construction-related HGV movements will be undertaken outside of peak-traffic periods and the school peak period hours of 07:45-08:45 and 15:00-16:00 (Para 4.3.5, TS).

Construction Parking is provided for all operatives, visitors and construction vehicles (Image 2.1, CTMP) within the site. While a standard layout is indicated, 19 parking spaces have been identified within the example. The site will need to provide a full CTMP indicating adequate layout for a minimum of 80 vehicles (assuming some staff car pool), including any disabled bays, EV charging bays and HGV turnaround.

The CTMP also indicates that a shuttle service will be provided to align with the start/finish times of site shifts and use nearby facilities including bus stops, key transport nodes and Haverfordwest Rail station. Further details on the shuttle service should be provided within a full CTMP prior to commencement of the proposed development and indicate where staff would park to connect to the staff shuttle, frequency of operation, maximum number of users per trip and routing. The CHA notes

that a proposed timetable and capacity information has been provided within Table 2.6. Confirmation of final routing, expected numbers, pick-up and drop-off arrangements can be confirmed with the full CTMP submission.

Passing bays, which have been discussed separately in this report, will require further detailed design drawings and be set out in order to accommodate the largest HGV to site. Full width and depth drawings will need to be provided prior to commencement, with the works undertaken within a S278 Agreement.

The outline CTMP indicates that one abnormal indivisible load (AIL) is anticipated for the site; this will likely require co-ordination with the Pembrokeshire Council's Street Care team in order to ensure that appropriate movements, road closures and access is permissible. This process can take up to 3 months to agree, and as such the Applicant is advised to commence this process as soon as practicable should planning permission be granted.

Glint and Glare Assessment

A comprehensive Glint & Glare Assessment was undertaken for the proposed development to evaluate potential impacts on highways within 1 km of the site, including the A4076, Pembroke Road and Moorland Road. The initial geometric modelling identified the potential for solar reflections at 12 out of 24 road receptors, with some locations predicted to experience high levels of glare in a bare-earth scenario. However, a detailed visibility analysis, which considered existing vegetation and proposed landscape planting, demonstrated that these features would effectively screen all road receptors from any solar reflections. Consequently, no glint or glare effects are predicted on the A4076, Pembroke Road, Moorland Road or surrounding highways, and no mitigation is required.

Swept Path Analysis

Drawing 5076-D02 presents the swept path analysis for construction vehicles and fire tenders accessing and egressing the WAA. The analysis demonstrates that the proposed site access can accommodate the design vehicles; however, observations of the wider route indicate potential constraints at the junction of Pembroke Road, Targate Road and Moorland Road.

In particular, the swept path drawings show larger vehicles over-running the southern edge of the carriageway and encroaching onto the adjacent footway when undertaking turning manoeuvres through the junction. This suggests that the existing highway geometry may be insufficient to accommodate the largest anticipated vehicles whilst maintaining full segregation between vehicular and pedestrian movements.

Accordingly, it is likely that localised mitigation measures will be required at this location to facilitate the safe passage of construction vehicles and to prevent encroachment onto the footway. Such measures could include carriageway widening, localised kerb realignment, footway strengthening, or other highway improvements, subject to detailed design and agreement with the Highway Authority. Any mitigation should ensure that pedestrian safety is maintained and that the operation of the junction remains suitable for all highway users throughout the construction phase.

Mitigation

In order to facilitate construction traffic access to the WAA via White House Farm, and to accommodate turning movements between Pembroke Road and Moorland Road, a number of minor highway improvements and passing places are proposed along the route. These measures are

illustrated on Drawing 5076-ATR02 and are intended to ensure that larger construction vehicles can safely navigate the local highway network whilst minimising disruption to other road users.

As indicated above, at the junction of Pembroke Road and Moorland Road, localised kerb widening is proposed to improve the turning path of larger vehicles accessing Moorland Road. The works are likely to require the partial realignment of the existing footway on the southern side of Targate Road, involving a modest reduction in footway width to provide additional carriageway space for turning vehicles.

Further localised widening is proposed on the bend opposite Highlands, immediately prior to the White House Farm access. This improvement is intended to facilitate the passage of larger vehicles and reduce the likelihood of overrunning onto the verge. The works are anticipated to comprise minor verge reprofiling and the provision of a compacted hardstanding surface to protect the highway verge from damage associated with repeated vehicle movements.

In addition to these junction improvements, a series of passing bays are proposed along Moorland Road to enable opposing vehicles to pass safely and efficiently. The proposed passing bays are located:

- Adjacent to Cross View, approximately 80 metres west of the junction with Pembroke Road, on the northern side of the carriageway;
- Within the verge adjacent to Shipping Back, approximately 337 metres west of the Cross View passing bay, on the northern side of the carriageway;
- Opposite Green Cottage, approximately 130 metres west of the Shipping Back passing bay, on the southern side of the carriageway; and
- East of Shire Hall, approximately 130 metres west of the Green Cottage passing bay, on the northern side of the carriageway.

Collectively, these measures would improve the operational capacity of Moorland Road during the construction phase, reduce the potential for vehicle conflict on the narrower sections of the route, and assist in accommodating the anticipated construction traffic associated with the development.

Whilst the proposed mitigation measures are welcomed, it is important to recognise the existing function of Moorland Road as a route regularly used by pedestrians, dog walkers, cyclists and equestrians, particularly those accessing Public Footpath PP21/3/1. Previous pre-application correspondence highlighted the need for construction traffic management measures to specifically address interactions between site traffic and equestrian users.

In this regard, all HGV drivers, contractors and site personnel should receive appropriate training and guidance regarding safe interaction with horses and riders, including regular refresher briefings throughout the construction period. Such training should reflect current guidance published by the British Horse Society and include the actions drivers should take when encountering horses on the highway.

Although HGV movements are expected to be concentrated during the construction phase, all drivers associated with the development should remain aware that vulnerable road users may be encountered at any point along the route. Particular care should be exercised where visibility is restricted, carriageway widths are constrained, or users are unable to easily move clear of the highway.

Where appropriate, drivers of larger vehicles should utilise designated passing bays and other suitable locations to allow pedestrians, wheelchair users, cyclists and equestrians to pass safely. The principles set out within the Transport Hierarchy and the Highway Code place a greater responsibility on drivers of larger and heavier vehicles to reduce risk and ensure the safety of more

vulnerable road users. This responsibility is especially important on rural roads such as Moorland Road, where opportunities for refuge are limited and highway users frequently share the available carriageway space.

Beyond these measures, the CHA notes that the CTMP includes additional measures that could be offered to ensure the safety of non-motorised users (Para 5.3.7). These include temporary segregated paths, clearly marked NMU corridors where possible (and agreement with neighbouring landowners), appropriate signage, use of banksmen or traffic marshals during periods of high construction activity and scheduling HGVs appropriately outside of peak NMU usage. All of these options should be practicably explored and provided to the LPA for consideration prior to commencement of the proposed development.

The implementation of a Driver Awareness and Vulnerable Road User Protocol, to be reviewed and agreed by the Local Planning Authority should be submitted prior to commencement. The Protocol shall include measures for informing all maintenance contractors and visitors of the presence of equestrians, pedestrians, cyclists and other vulnerable road users on Moorland Road and surrounding routes, together with procedures for safe interaction in accordance with current Highway Code and British Horse Society guidance. This can be submitted alongside the measures for the NMU.

The Applicant is advised that the proposed highway improvement works, including the localised kerb widening and provision of passing bays along Moorland Road, will require the completion of a Section 278 Agreement with the Highway Authority prior to implementation. Details of the proposed works, construction methodology and maintenance arrangements should be agreed as part of that process. Given that these measures are proposed primarily to facilitate construction traffic, the Highway Authority would expect all temporary highway alterations, including localised kerb works, to be removed and the highway restored to its original condition upon completion of the construction phase, unless otherwise agreed.

Summary

It is recommended that the transportation related conditions included in the LIR be imposed.

Date • Dyddiad 26th June 2026
Your ref • Eich cyfeirnod 25/0880/NS
My ref • Fy nghyfeirnod CL095
Telephone • Ffôn [REDACTED]
Email • Ebost [REDACTED]
www.pembrokeshire.gov.uk / www.sir-benfro.gov.uk



Pembrokeshire County Council
Cyngor Sir Penfro

WILL BRAMBLE CBE.
Chief Executive / Prif Weithredwr

RICHARD BROWN
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Please ask for
Os gwelwch yn dda gofynnwch am



[REDACTED]
Planning Department,
Pembrokeshire County Council,
County Hall,
Haverfordwest
SA61 1TP

Dear [REDACTED]

Re: 25/0880/NS - consultation on Development of National Significance - Construction and operation of a solar energy generating station, Battery Energy Storage System (BESS) etc - Land at White House, Moorland Road and Middle Hill, Pembroke Road, Freystrop

Further to your request for further comment from the Commons Registration Authority (CRA), I offer further comment as follows:

- 1) The CRA notes the immediate proximity of the proposed DNS to registered common CL095 – Northmoor Common.
- 2) The CRA offers further additional comment on the Ecological Impact Assessment (EIA) undertaken by FPCR Environment & Design on behalf of the Client, Qair Renewables Ltd and dated December 2025.

Priority Areas, Section 7 of the Environment (Wales) Act 2016.

- 3) On Page 2 of FPCR's report (**Ecological Baseline**) the CRA notes the recognition of a number of non-statutory designated sites in close proximity to the application site, including ancient woodland, Saltmarsh and B-Lines. This land is designated by Natural Resources Wales on the basis of its classification as Priority Habitat, according to Section 7 of the Environment (Wales) Act 2016.

We welcome correspondence in Welsh and English, and will respond within a maximum of 15 working days. We will respond in the language in which the correspondence is received (unless you ask us to do otherwise). / Rydym yn croesawu gohebiaeth yn Gymraeg a Saesneg a byddwn yn ymateb cyn pen 15 diwrnod gwaith fan bellaf. Byddwn yn ymateb yn yr un iaith â'r ohebiaeth a dderbyniwyd (oni bai eich bod yn gofyn i ni wneud yn wahanol).

For a copy in large print, easy-read, Braille, audio, or an alternative language, please contact Pembrokeshire County Council on the number above. / Os am gopi mewn print mawr, fformat hawdd ei ddarllen, Braille, sain neu mewn iaith arall, cysylltwch â Chyngor Sir Penfro ar y rhif uchod.

However, Northmoor Common also includes Section 7 Priority Habitat, including Lowland Acid Grassland, Lowland Marshy Grassland and Lowland Heathland. Given the immediate proximity of this habitat to the proposed application site, it is unclear to the CRA whether the potential impact on this important habitat has been adequately assessed. There is no reference to it in the report.

The Conservation of Habitats and Species Regulations 2017

- 4) The CRA notes reference to the Conservation of Habitats and Species Regulations 2017 on page 7 of FPCR's Report. Northmoor Common is host to Marsh Fritillary butterfly (*Euphydryas Aurinia*), which is listed as an Annex 2 species under the Regulations.
- 5) The CRA further notes that while ADERYN-LERC list records of this species (dated to 21/5/2025) it is not referenced in the Invertebrate Data Summary Report at Appendix H of the EIA. It may be that ADERYN-LERC had not updated their records at the time the data was compiled, in which case the CRA trusts that the updated information provided here will be of some assistance.
- 6) On the basis of the information outlined above, and the importance of both the habitats and the ecologically sensitive species indicated, the CRA would be grateful for clarification as to whether further assessment of potential impacts on these habitats and species will now be undertaken, and/or what mitigation measures will be undertaken to ensure that these sensitive habitats and species are not adversely affected by the proposed development.

Kind Regards,



Swyddog Tir Comin/Common Land Officer.

HYSBYSIAD STATUDOL

I gael copi print bras o'r Hysbysiad hwn
ffoniwch: 0300 123 1590 neu E-Bostiwhch:
PEDW.Seilwaith@llyw.cymru

STATUTORY NOTICE

For a large print copy of this Notice
phone: 0300 123 1590 or E-Mail:
PEDW.infrastructure@gov.wales



Deddf Cynllunio Gwlad a Thref 1990 (Fel y'i Diwygiwyd) Gorchymyn Datblygiadau o Arwyddocâd Cenedlaethol (Gweithdrefn) (Cymru) 2016 (Fel y'i Diwygiwyd) HYSBYSIAD O DAN ERTHYGL 18 O GAIS AM GANIATÂD CYNLLUNIO MEWN PERTHYNAS Â DATBLYGIAD O ARWYDDOCÂD CENEDLAETHOL

Datblygiad a gynigir yn: Tir yn White House Farm, Ffordd Moorland, Freystrop, Sir Benfro (SA62 4LE) a Middle Hill Farm

Rwyf yn hysbysu bod: GSC White House Farm Limited

yn gwneud cais i Weinidogion Cymru am ganiatâd cynllunio mewn perthynas â Datblygiad o Arwyddocâd Cenedlaethol (DAC), sef:

Mae'r datblygiad arfaethedig yn cynnwys fferm solar a system storio ynni batri (BESS). Byddai'r prosiect yn allforio hyd at 30MW o bŵer i'r grid ac yn mewnforio hyd at 12MW o bŵer ar gyfer storio batri.

Gall aelodau'r cyhoedd archwilio copïau:

- o'r cais;
- y cynlluniau, a
- dogfennau eraill sy'n gysylltiedig â'r cais

yn: Cyngor Sir Penfro, Neuadd y Sir, Hwlfordd, Sir Benfro SA61 1TP

yn ystod unrhyw oriau rhesymol hyd at 10/07/2026, ac ar-lein yn <https://planningcasework.service.gov.wales/cy> - a chwiliwch am 'CAS-03107-C5X9W1'

CYFLWYNIR DATGANIAD AMGYLCHEDDOL GYDA'R CAIS

Gall aelodau'r cyhoedd dderbyn copïau o'r Datganiad Amgylcheddol gan: 5th Floor, Exchange Station, Tithebarn Street, Liverpool L2 2QP

Os oes unrhyw un yn dymuno cyflwyno sylwadau ar y cais hwn, rhaid iddynt ysgrifennu at Weinidogion Cymru (mae'r manylion isod) erbyn y 10/07/2026. Bydd yr holl sylwadau a dderbynnir yn cael eu cyhoeddi ar-lein wedi i'r terfyn amser fynd heibio.

Penderfyniadau Cynllunio ac Amgylchedd Cymru

Gwaith Achos Datblygiadau o Arwyddocâd Cenedlaethol

Adeilad y Goron, Parc Cathays, Caerdydd CF10 3NQ

Ffôn: 0300 123 1590

E-Bost: PEDW.Seilwaith@llyw.cymru

Mae rhagor o wybodaeth a chanllawiau ar y broses DAC ar gael ar-lein yn: <https://www.llyw.cymru/datblygiadau-o-arwyddocad-cenedlaethol-dns-canllawiau>

Llofnodwyd: Isabel Nethell, Pennaeth Gweithrediadau

Dyddiad: 05/06/2026

Town and Country Planning Act 1990 (As Amended) The Developments of National Significance (Procedure) (Wales) Order 2016 (As Amended)

NOTICE UNDER ARTICLE 18 OF APPLICATION FOR PLANNING PERMISSION IN RESPECT OF DEVELOPMENT OF NATIONAL SIGNIFICANCE

Proposed development at: Land at White House Farm, Moorland Road, Freystrop, Pembrokeshire (SA62 4LE) and Middle Hill Farm

I give notice that: GSC White House Farm Limited

is applying to the Welsh Ministers for planning permission in respect of Development of National Significance (DNS) which is:

The proposed development comprises a solar farm and battery energy storage system (BESS). The project would export up to 30MW of power to the grid and import up to 12MW of power for battery storage.

Members of the public may inspect copies of:

- the application;
- the plans; and
- other documents associated with it

at: Pembrokeshire County Council, County Hall, Haverfordwest, Pembrokeshire SA61 1TP

during all reasonable hours until 10/07/2026 and, online at <https://planningcasework.service.gov.wales/> - and search for 'CAS-03107-C5X9W1'

THE APPLICATION IS ACCOMPANIED BY AN ENVIRONMENTAL STATEMENT

Members of the public may obtain copies of the Environmental Statement from: 5th Floor, Exchange Station, Tithebarn Street, Liverpool L2 2QP, for a charge, so long as stocks last.

Anyone who wishes to make representations about this application must write to the Welsh Ministers (details below) by 10/07/2026. All representations received will be published online as soon as the deadline has passed.

Planning and Environment Decisions Wales

Developments of National Significance Casework

Crown Building, Cathays Park, Cardiff CF10 3NQ

Tel: 0300 123 1590

E-Mail: PEDW.infrastructure@gov.wales

More information and guidance on the DNS process can be found online at: <https://gov.wales/developments-national-significance-dns-guidance>

Signed: Isabel Nethell, Head of Operations

Date: 05/06/2026



Site Notice Locations - Land at White House, Moorland Road and Middle Hill, Pembroke Road, Freystrop

Crëwyd: 8 Gorffennaf 2026
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