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Ein Cyf / Our Ref: **DNS CAS-03107-C5X9W1**

Ffôn / Tel: 0300 123 1590

Dyddiad / Date: 24 July 2026

E-Bost / E-Mail: PEDW.infrastructure@gov.wales
(gan ebost / via e-mail)

Address:

Annwyl Syr / Madam | Dear Sir / Madam

**** English Text follows the Welsh text, see page 8 onwards****

Deddf Cynllunio Gwlad a Thref 1990 (fel y'i diwygiwyd) ('Deddf 1990')
Rheoliadau Datblygiadau o Arwyddocâd Cenedlaethol (Cymru) 2016 (fel y'u
diwygiwyd) ('y Rheoliadau DAC')
Gorchymyn Datblygiadau o Arwyddocâd Cenedlaethol (Gweithdrefn) (Cymru) 2016
(fel y'i diwygiwyd) ('y Gorchymyn Gweithdrefn DAC')

Cais gan: GSC White House Farm Limited

Safle: Tir ar Fferm White House, Moorland Road, Freystrop a Fferm Middle Hill,
Freystrop

Mae'r Arolygydd a benodwyd, sef **Richard Duggan BSc (Anrh) DipTP MRTPI**, wedi gofyn i mi gysylltu â chi ynglŷn â'r archwiliad hwn o Ddatblygiad o Arwyddocâd Cenedlaethol (DNS).

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Mae'r llythyr hwn yn hysbysiad swyddogol o faterion pwysig yn ymwneud â'r archwiliad hwn. Darllenwch yr holl wybodaeth isod yn ofalus a chysylltwch â ni os oes unrhyw beth yn aneglur.

1. Hysbysiad o dan adran 319B y Ddeddf ynghylch y weithdrefn ar gyfer yr archwiliad hwn

Mae'r Arolygydd wedi adolygu'r cais, yr Adroddiad ar yr Effaith Leol (LIR) a baratowyd gan Gyngor Sir Penfro, a'r holl sylwadau a gyflwynwyd. Ar ôl ystyried yn ofalus, mae wedi penderfynu y gall y cais symud ymlaen yn ddigonol trwy'r weithdrefn sylwadau ysgrifenedig ac nad oes angen sesiynau gwrandawriad nac ymchwiliad.

Fodd bynnag, nid yw hyn yn atal yr Arolygydd rhag gofyn am wybodaeth ychwanegol yn ysgrifenedig na cheisio eglurhad pellach os bydd yn credu bod hynny'n angenrheidiol. Gall yr Arolygydd hefyd newid y weithdrefn unrhyw bryd yn ystod y cais, os bydd angen.

2. Cais ffurfiol am 'wybodaeth ychwanegol' o dan Reoliad 15(2) y Rheoliadau DNS gan y partïon a enwir yn Atodiad A.

Ar ôl adolygu'r wybodaeth a gyflwynwyd, mae'r Arolygydd wedi penderfynu bod angen gwybodaeth ychwanegol gan yr ymgeisydd a'r Awdurdod Cynllunio Lleol (ACLI). Amlinellir y wybodaeth sy'n ofynnol yn Atodiad A i'r llythyr hwn ac mae'n rhaid ei chyflwyno cyn gynted ag y bo'n ymarferol ac o fewn 6 wythnos o ddyddiad y llythyr hwn h.y. erbyn **04 Medi 2026** fan bellaf. Fe allai'r Arolygydd geisio gwybodaeth ychwanegol yn ddiweddarach hefyd os bydd yn penderfynu bod angen hynny.

Oni bai bod yr Arolygydd yn cytuno i amrywio'r cyfnod o 6 wythnos a bennwyd i gyflwyno'r wybodaeth y gofynnwyd amdani, neu os estynnir y cyfnod atal dros dro i ganiatáu ar gyfer paratoi a chyflwyno Gwybodaeth Ychwanegol, byddwn yn cynnal y cyhoeddusrwydd angenrheidiol ar ôl derbyn y wybodaeth y gofynnwyd amdani a fydd yn rhoi cyfle i bartïon eraill wneud sylwadau ar ei chynnwys. Bydd yr holl sylwadau'n cael eu cyhoeddi ar y wefan Porth Gwaith Achos Cynllunio.

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3. Hysbysiad o dan Adran 62L(5) Deddf 1990 y bydd y cyfnod penderfynu'n cael ei atal dros dro.

Yn unol â'r canllawiau cyhoeddedig ar y broses DNS, mae Penderfyniadau Cynllunio ac Amgylchedd Cymru (PCAC) yn atal y cyfnod penderfynu ar gyfer y cais am gyfnod dros dro er mwyn rhoi amser i'r wybodaeth ychwanegol gael ei chyflwyno a bod yn destun cyfnod cyhoeddusrwydd ac ymgynghori 5 wythnos.

Ataliaf drwy hyn y cyfnod penderfynu ar gyfer y cais hwn am gyfnod dros dro o 11 wythnos. Bydd y cyfnod penderfynu'n ailgychwyn ar **09 Hydref 2026**.

Mae'r Arolygydd hefyd wedi penderfynu ei bod yn debygol y bydd yn ymweld â safle'r datblygiad arfaethedig a'r ardal amgylchynol yn ddigwmni. Os bydd hyn yn newid ac ystyrir bod angen ymweliad gyda chwmni, rhoddir gwybod i bartïon â buddiant, ond dylid nodi na fydd y cynnig yn cael ei drafod yn ystod yr ymweliad safle.

Cysylltwch â ni os bydd gennych unrhyw ymholiadau.

Yn gywir,

Jess Mandeville

Jess Mandeville
Swyddog Achos

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Atodiad A: Cais ffurfiol am wybodaeth ychwanegol o dan Reoliad 15(2) y Rheoliadau DNS. I'w chyflwyno erbyn 04 Medi 2026 fan bellaf.

Gan yr Ymgeisydd (GSC White House Farm Limited)

1. Mae'r cais yn amcangyfrif capasiti cynhyrchu'r cynllun, y nifer gyfatebol o gartrefi y gellid eu pweru a faint o garbon a fyddai'n cael ei wrthbwysu'n flynyddol. Dylid hefyd darparu cyfrifiad o'r allbwn trydan a ddisgwylir yn flynyddol ac ar hyd oes y prosiect yn seiliedig ar amodau penodol y safle, ynghyd ag esboniad o sut y deilliwyd y ffigurau hyn o'r ffigur capasiti. Er mwyn deall effaith garbon y cynllun yn well, dylid darparu asesiad cydbwysedd carbon sy'n ystyried defnydd y prosiect o garbon (gan gynnwys gweithgynhyrchu'r paneli a'r seilwaith ac adeiladau cysylltiedig, y gwaith adeiladu a datgomiynu, ac unrhyw amnewid ac atgyweirio a allai fod yn angenrheidiol ar hyd oes y prosiect), yn ogystal â'r effeithiau lleihau carbon yn seiliedig ar y trydan y disgwylir ei gynhyrchu.
2. Mae Cyfoeth Naturiol Cymru (CNC) yn croesawu'r wybodaeth a ddarparwyd ynglŷn â'r bont rhychwant agored arfaethedig (gweler llythyr CNC dyddiedig 10 Gorffennaf 2026), ond mae'n pryderu ynglŷn â faint o wybodaeth a ddarparwyd ynglŷn â'r dulliau arfaethedig o ailbroffilio ffosydd ac adfer/naturiol glannau'r afon o dan y bont. Darparwch wybodaeth ychwanegol ynglŷn â hyn, os gwelwch yn dda.
3. Mae'r safle wedi'i gysylltu'n hydrolegol ag Ardal Cadwraeth Arbennig (ACA) Sir Benfro Forol a Safle o Ddiddordeb Gwyddonol Arbennig (SoDdGA) Dyfrffordd y Ddau Gledau trwy Nant Myrddin i'r gorllewin a Red Water i'r dwyrain. Mae SoDdGA Coed Hook i lawr yr afon o safle'r cais, hefyd. Gofynnir i chi fynd i'r afael â phryderon CNC ynglŷn â'r dulliau arfaethedig o ailbroffilio ffosydd ynghyd ag unrhyw newidiadau canlyniadol i'r Asesiad Rheoliadau Cynefinoedd Cysgodol a phenodau'r Datganiad Amgylcheddol a chynlluniau, dogfennau neu adroddiadau eraill ategol.
4. Ymatebwch i'r sylwadau a wnaed gan CNC sy'n honni na chynhaliwyd yr arolwg llygod y dŵr ar adeg o'r flwyddyn sy'n cyd-fynd ag arfer gorau mewn canllawiau arolygu cyhoeddedig.
5. Ymatebwch i sylwadau a phryderon Cyngor Sir Penfro ynglŷn â'r Asesiad o'r Effaith ar y Dirwedd a'r Effaith Weledol (LVIA), gan gynnwys, ac yn bwysig, y rhai sy'n ymwneud ag effeithiau cronol (gweler adran 8.0 yr Adroddiad ar yr Effaith Leol (LIR)).

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6. Gwahoddir yr ymgeisydd i ystyried a fyddai golygfan(nau) ychwanegol yn fuddiol, yn enwedig o dir lle gellid asesu'r effeithiau cronol gyda datblygiadau fferm wynt eraill.
7. Ymatebwch i sylwadau Ecolegydd Cyngor Sir Penfro ynglŷn ag oedran, ac felly addasrwydd, yr Arolygon Adar sy'n Gaeafu (Hydref a Rhagfyr 2023).
8. Ymatebwch i sylwadau Swyddog Trafnidiaeth Cyngor Sir Penfro ynglŷn â Moorland Road a'r gwrthdaro posibl â cherddwyr, pobl sy'n mynd â chŵn am dro, beicwyr a marchogion, yn enwedig y rhai sy'n defnyddio Llwybr Troed Cyhoeddus PP21/3/1 (gweler Atodiad 4 yr LIR).
9. Mae'r Datganiad Trafnidiaeth yn cyfeirio at ledu cyrbiau'n lleol a chreu mannau mynd heibio ar hyd Moorland Road. Er bod Lluniadau 5076-ATR01 i ATR06 yn dangos lle y bwriedir lledu'r cwrw a darparu mannau mynd heibio, prin iawn yw'r manylion ynglŷn â graddau'r gwaith a'r effaith bosibl ar unrhyw goed neu wrychoedd. Felly, gwahoddir yr ymgeisydd i ddarparu mwy o fanylion am y gwaith priffyrdd hwn, gan gynnwys arsylwadau a sylwadau ar yr angen i wneud unrhyw newidiadau canlyniadol i benodau'r Datganiad Amgylcheddol a chynlluniau, dogfennau neu adroddiadau eraill ategol.
10. Ymatebwch i sylwadau'r Awdurdod Cofrestru Tiroedd Comin (CRA) ynglŷn ag effeithiau posibl ar gynefinoedd a rhywogaethau o fewn Comin Northmoor (gweler Atodiad 4 yr LIR).
11. Yn ôl paragraff 1.2.9 y Datganiad Cynllunio, 'Mae piblinell nwy prif gyflenwad pwysedd uchel genedlaethol National Gas Transmission yn mynd o'r gogledd i'r de ar draws Moorland Road ger y fynedfa i'r Ardal Araé Orllewinol (WAA), ac felly ar draws y llwybr ceblau arfaethedig'. Cynigir gosod ffos cebl 33kV o'r Ardal Araé Ddwyreiniol (EAA) i'r WAA tua'r de ar hyd Pembroke Road cyn mynd i'r gorllewin ar hyd Moorland Road i'r WAA. Gwahoddir yr ymgeisydd i wneud sylwadau ar sut byddai'r cebl arfaethedig yn cael ei ddarparu heb effeithio ar y biblinell nwy.
12. Mae'r Cyngor, CNC ac ymgynghoreion statudol eraill wedi cyflwyno amodau awgrymedig. Dylai'r rhain lywio atodlen i'w chynhyrchu gan yr apelydd a allai hefyd gynnwys amodau eraill i ymateb i faterion a godir yn yr ymatebion ymgynghori. Dylai rhestr o'r fath gynnwys y rhesymau dros bob amod a chyfeiriad at bolisiâu perthnasol y cynllun datblygu. Dylai'r ymgeisydd a phartïon perthnasol sicrhau bod

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unrhyw amodau cytunedig yn bodloni'r holl brofion a fanylir yng Nghylchlythyr Llywodraeth Cymru (CLIC 016/2014) 'Defnyddio Amodau Cynllunio i Reoli Datblygu'.

13. Mewn achosion DNS diweddar, mae Cyngorau wedi codi pryderon penodol ynglŷn â'u gallu ariannol i ymgymryd â phrosiectau datgomisiynu mawr, yn enwedig o ystyried bod nifer fawr o gynigion DNS o fewn ardaloedd gweinyddol Cyngorau penodol. Fel y cyfryw, mae Cyngorau wedi gofyn i ymgeiswyr ddarparu Rhwymedigaeth Gynllunio sy'n mynnu bod bond datgomisiynu wedi'i gwblhau yn cael ei gyflwyno i'r Cyngor, neu fod blaendal ariannol yn cael ei dalu i gyfrif y Cyngor. Fe allai'r rhain fod yn angenrheidiol i sicrhau bod y Cyngor yn gallu ymgymryd â gwaith datgomisiynu pan fydd angen, er enghraifft, pan fydd gan y datblygwr / tiffeddiannwr broblemau ariannol neu os na fydd yn bodoli mwyach.

Cefnogir trefniadau o'r fath gan Bolisi 18(11) Cymru'r Dyfodol 2040, sy'n mynnu "...darpariaethau derbyniol yn ymwneud â datgomisiynu'r datblygiad ar ddiwedd ei oes, gan gynnwys dileu seilwaith ac adfer y safle yn effeithiol", a pharagraff 5.9.30 Polisi Cynllunio Cymru, sy'n datgan "Gall awdurdod ofyn am warantau ariannol ar ffurf rhwymedigaeth gynllunio/ cytundeb Adran 106, fel rhan o'r broses o gymeradwyo caniatâd cynllunio i sicrhau y cyflawnir y broses adfer yn llawn". Mae'r cyngor a amlinellir ym mharagraff 4.22 Cylchlythyr 016/14 'Defnyddio amodau cynllunio i reoli datblygu' yn datgan "...mae rhai materion y mae'n fwy priodol gofyn amdanynt drwy rwymedigaeth gynllunio ac na ddylid gofyn amdanynt mewn amod, er enghraifft ymrwymadau ar ran y datblygwr sy'n cynnwys trosglwyddo tir neu daliadau sydd i'w gwneud i'r awdurdod cynllunio lleol".

Fel y cyfryw, gwahoddir yr ymgeisydd i roi ei safbwyntiau ar y mater hwn, gan gynnwys ymateb manwl ynglŷn â sut byddai'r broses ddatgomisiynu'n cael ei gweithredu a'i rheoli. Fodd bynnag, sylwch y dylai eich ymateb, ynghyd ag unrhyw rwymedigaeth gynllunio sy'n angenrheidiol, gael ei gyflwyno'n brydlon.

Nodyn Pwysig

Dylai'r holl wybodaeth ychwanegol gael ei chyflwyno ar ffurf sy'n ei gwahaniaethu'n glir oddi wrth wybodaeth a gyflwynwyd eisoes.

Fe allai'r ymgeisydd hefyd ddymuno manteisio ar y cyfle hwn i ymateb i unrhyw bryderon eraill a godwyd gan bartïon â buddiant ac ymgylgoreion statudol trwy ddarparu gwybodaeth ychwanegol i gynorthwyo'r Arolygydd i ystyried y cynllun. Dylai unrhyw wybodaeth o'r fath gael ei darparu ochr yn ochr â'r wybodaeth y gofynnwyd amdani'n ffurfiol uchod er mwyn iddi fod yn destun yr un ymarfer cyhoeddusrwydd ac ymgynghori.

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Gan Gyngor Sir Penfro

1. Fe nodwch yng nghwestiwn 12 uchod y gofynnwyd i'r ymgeisydd ddarparu rhestr lawn a chytunedig o amodau awgrymedig. Felly, byddai'n ddefnyddiol pe gallai'r ACLI gysylltu â'r ymgeisydd i ddarparu'r rhestr lawn a chytunedig o amodau y cyfeiriwyd ati, gan ystyried y profion a gynhwysir yng Nghylchlythyr Llywodraeth Cymru (CLIC 016/2014) 'Defnyddio Amodau Cynllunio i Reoli Datblygu'. Os na ellir cytuno ar ffurf amod neu'r angen amdano, rhowch sylwadau sy'n esbonio'r sefyllfa, os gwelwch yn dda.

**** English text begins on the next page****

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Town and Country Planning Act 1990 (as amended) ('the 1990 Act')
The Developments of National Significance (Wales) Regulations 2016 (as amended)
('the DNS Regulations')
The Developments of National Significance (Procedure) (Wales) Order 2016 (as amended) ('the DNS Procedure Order')

Application by: GSC White House Farm Limited

Site: Land at White House Farm, Moorland Road, Freystrop and Middle Hill Farm, Freystrop

The appointed Inspector, **Richard Duggan BSc (Hons) DipTP MRTPI**, has asked me to contact you regarding this Development of National Significance (DNS) examination.

This communication constitutes official notification of important matters related to this examination. Please read the following information in its entirety. If anything is unclear please contact us.

1. Notice under section 319B of the Act as to the procedure by which this examination will proceed

The Inspector has reviewed the application, the Local Impact Report (LIR) prepared by Pembrokeshire County Council, and all representations submitted. After careful consideration he has decided that the application can adequately proceed by the written representations procedure and that no hearings or inquiry sessions are required.

However, this does not preclude the Inspector from requesting further information in writing or to seek further clarification should he consider it necessary. The Inspector can also change the procedure at any time during the course of the application should it become necessary to do so.

2. Formal request for 'further information' under Regulation 15(2) of the DNS Regulations from the parties named in Annex A.

After reviewing the submitted information, the Inspector has determined that further information is required from the applicant and the LPA. The required information is set out

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in Annex A to this letter and must be submitted as soon as practicable and within 6 weeks of the date of this letter i.e. no later than **04 September 2026**. The Inspector may also seek further information at a later date if he decides it is necessary.

Unless the Inspector later agrees to vary the specified 6 weeks to submit the requested information, or the suspension period is extended to allow for the preparation and submission of Further Information, we will carry out the necessary publicity on receipt of the requested information which will provide other parties with an opportunity to comment on its content. All representations will be published to the Planning Casework Portal website.

3. Notice under Section 62L(5) of the 1990 Act that the determination period shall be suspended.

In line with the published guidance on the DNS process, PEDW is suspending the determination of the application to allow time for the further information to be submitted and subjected to a 5 week publicity and consultation period.

I hereby suspend the determination period for this application for a period of 11 weeks. The determination period will resume on **09 October 2026**.

The Inspector has also decided that it is likely that he will undertake unaccompanied site visits to view the site of the proposed development and the surrounding area. If this changes and an accompanied visit is deemed to be necessary, interested parties will be notified, but it should be noted that there will be no discussion of the proposal during the site visit.

Please contact us if you have any queries.

Yours sincerely,

Jess Mandeville

Jess Mandeville
Case Officer

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Annex A: Formal request for further information under Regulation 15(2) of the DNS Regulations. To be submitted no later than 04 September 2026.

From the Applicant GSC White House Farm Limited

1. The application provides estimates of the generating capacity of the scheme, the equivalent number of homes that could be powered and the amount of carbon that would be offset annually. A calculation of the expected annual and lifetime electricity output should also be provided based on site specific conditions, together with an explanation of how these figures are derived from the capacity figure. To better understand the carbon impact of the scheme a carbon balance assessment should be provided that accounts for the carbon consumption of the project (to include the manufacture of the panels and associated infrastructure and buildings, the construction and decommissioning work, and any replacement and repair that may be necessary over the lifetime of the project) as well as the carbon reduction effects based on the anticipated electricity generated.
2. NRW welcomes the information provided for the proposed open span bridge (see NRW letter dated 10 July 2026), but is concerned with the level of information provided for the proposed ditch reprofiling methods and the restoration/naturalisation of the river banks beneath the bridge. Please provide further information in this regard.
3. The site is hydrologically linked to the Pembrokeshire Marine Special Area of Conservation (SAC) and the Milford Haven Waterway Site of Special Scientific Interest (SSSI) via Merlin's Brook to the west and Red Water to the east. Hook Wood SSSI is also downstream of the application site. Please address the concerns of NRW regarding the proposed ditch reprofiling methods together with any consequential changes to the Shadow Habitats Regulations Assessment and chapters of the Environmental Statement and other supporting plans, documents or reports.
4. Please provide a response to the comments raised by NRW regarding the survey for water voles not being carried out at a time of year that accords with published best practice survey guidance.
5. Please provide a response to Pembrokeshire County Council's comments and concerns regarding the Landscape and Visual Impact Assessment (LVIA), including

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and importantly those relating to cumulative effects (see section 8.0 of the Local Impact Report).

6. The applicant is invited to consider whether additional viewpoint/s would be beneficial, in particular from land where the cumulative effects with other solar farm developments could be assessed.
7. Please provide a response to the comments of Pembrokeshire County Council's Ecologist regarding the age and, therefore, suitability of the Wintering Bird Surveys (October and December 2023).
8. Please provide a response to the comments of Pembrokeshire County Council's Transportation officer regarding Moorland Road and potential conflict with pedestrians, dog walkers, cyclists and equestrians, particularly those accessing Public Footpath PP21/3/1 (see LIR Appendix 4).
9. The Transport Statement refers to localised kerb widening and the creation of passing bays along Moorland Road. Whilst Drawings 5076-ATR01 to ATR06 provide an illustration of the location of the proposed kerb widening and passing bays, very little detail is provided regarding the extent of the works and the potential impact on any trees or hedgerows. Therefore, the applicant is invited to provide further detail of these highway works, to include observations and comments on the need to make any consequential amendments to chapters of the Environmental Statement and other supporting plans, documents or reports.
10. Please provide a response to the comments of the Commons Registration Authority (CRA) regarding potential impacts on habitats and species within Northmoor Common (see LIR Appendix 4).
11. Paragraph 1.2.9 of the Planning Statement states that 'National Gas Transmission's national high pressure gas main pipeline runs north south across Moorland Road near to the WAA access point, and therefore across the proposed cable route'. A 33kV cable trench is proposed to be laid from the EAA to the WAA southwards along Pembroke Road before running west along Moorland Road into the WAA. The applicant is invited to provide comments on how the proposed cable would be provided without having an impact on the gas pipeline.

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12. The Council, NRW and other statutory consultees have presented suggested conditions. These should inform a schedule to be produced by the applicant which may also include other conditions in response to matters raised in the consultation responses. Such a list should include reasons for each condition and reference to relevant development plan policies. The applicant and relevant parties should ensure that any agreed conditions meet all the tests detailed in Welsh Government Circular (WGC 016/2014) 'The Use of Planning Conditions for Development Management'.
13. In recent DNS cases Councils have raised specific concerns about their financial capability to undertake large decommissioning projects, particularly given the high volume of DNS proposals within the administrative areas of certain Councils. As such, Councils have requested applicants to provide a Planning Obligation to require either an executed decommissioning bond to be delivered to the Council, or for a cash deposit to be paid into the Council's account. These may be necessary to ensure that decommissioning works can be undertaken by the Council where necessary, for example, where the developer / landowner has financial issues or ceases to exist.

Such arrangements are supported by Policy 18(11) of Future Wales 2040 which requires "...acceptable provisions relating to the decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration", and paragraph 5.9.30 of Planning Policy Wales which states that "...an authority may require financial guarantees by way of Section 106 planning obligations/ agreements as part of the approval of planning permission to ensure that restoration will be fully achieved". The advice set out in paragraph 4.22 of Circular 016/14 'The use of planning conditions for development management' states that "...some matters are more appropriately required through an obligation and should not be required in a condition, for example, commitments on behalf of the developer involving transfers of land or payments to be made to the LPA".

As such, the applicant is invited to provide their views on this matter, including a detailed response on how the decommissioning process would be implemented and controlled. Please note, however, that your response along with any necessary planning obligation should be submitted in a timely manner.

Important Note

All additional information should be presented in a form which clearly distinguishes it from information that has already been submitted.

The applicant may also wish to take advantage of this opportunity to respond to any

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other concerns that have been raised interested parties and statutory consultees by providing additional information to assist the Inspector in his consideration of the scheme. Any such information should be provided alongside the information formally requested above. This will enable it to be subject to the same publicity and consultation.

From Pembrokeshire County Council

1. You will note in question 12 above that the applicant has been asked to provide a full and agreed list of suggested conditions. Therefore, it would be helpful if the LPA could liaise with the applicant to provide the full and agreed list of suggested conditions referred to, taking into account the tests contained in the Welsh Government Circular (WGC 016/2014) 'The Use of Planning Conditions for Development Management'. If agreement on the form or need for a condition cannot be reached, please provide commentary explaining the position.

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