

# Planning, Design and Access Statement

**Land at Bluestone, Narberth, Pembrokeshire**

**25 November 2021**

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## **Section 1: Introduction**

- 1.1 This Planning, Design and Access Statement has been prepared by Infinite Renewables Ltd. in support of an application for planning permission to construct and operate a circa. 3MW solar farm on land to the east of Bluestone Holiday Village, Pembrokeshire (please see the Site Location Plan at **Appendix 1**).
- 1.2 The site comprises agricultural land to the east of the A4075, with the cable route running north/north-west, primarily along an existing private vehicle track, to a new substation near the Bluestone resort.
- 1.3 The solar farm and associated infrastructure would be designed to provide low-cost green energy directly to Bluestone, a key local employer, who are a large consumer of energy, with any excess power exported to the grid to serve the local community. The proposal would provide an opportunity to help reduce the environmental impact of Bluestone's energy consumption and contribute towards the Welsh Government's and Pembrokeshire Council's targets for renewable energy generation.

### **The Applicant**

- 1.4 Infinite Renewables is a renewable energy developer based in South Wales, specialising in the development of low carbon energy solutions to industrial and commercial communities.

### **Request for a Screening Opinion**

- 1.5 A Screening Request was sent to Pembrokeshire County Council on 9<sup>th</sup> August 2021 and a Screening Opinion was received from the Council on 26<sup>th</sup> October 2021 confirming that the proposal is not subject to Environmental Impact Assessment development because it is not likely to have significant effects on the environment.

### **SAB Application**

- 1.6 We received confirmation from Pembrokeshire County Council that a SAB application is not required for the proposed solar farm and access track (matting tiles which grass grows through) on 11<sup>th</sup> October 2021.

### **Scope and Format of the Planning, Design and Access Statement**

- 1.7 This planning submission is supported by the following documents:
- Preliminary Ecological Appraisal (prepared by BSG);
  - Landscape and Visual Appraisal (prepared by EDP); and

- Heritage and Archaeological Desk-Based Assessment (prepared by Archaeology Wales).

1.8 This Statement outlines the context within which this planning application is made and provides a detailed examination of the main planning, design and access considerations raised by the proposal, together with reasoned justification in support of the proposed solar farm. The Statement is structured as follows:

- Section 1: Introduction – introduces the applicant, the basic principles of the proposal and structure of this Statement;
- Section 2: Site and Surroundings – provides a description of the site and the surrounding area;
- Section 3: Proposed Development - provides details of the proposed development;
- Section 4: Design and Access – sets out the design and access considerations;
- Section 5: Planning Policy Framework – sets out the planning policy framework in relation to the site and proposed development;
- Section 6: Assessment of the Proposals – analyses the key material planning considerations arising from the proposed development; and
- Section 7: Conclusions – this section sets out our conclusions.

## Section 2: Site and Surroundings

- 2.1 The proposed development site is located to the east of the A4075 and approximately 3.5km to the south-west of Narberth, Pembrokeshire. The site lies to the south-east of Bluestone Holiday Village, east of Oakwood Theme Park and is located outside Pembrokeshire National Park. The Site Location Plan (Drawing No: Bluestone 201, Rev. C) is enclosed which illustrates the location of the site.
- 2.2 The site comprises agricultural land of approximately 4.8 hectares, which includes the cable route. The site is predominantly pastureland bounded by heavy vegetation of relatively few species and is fairly undulating in its topographical make-up. The land is currently grazed, primarily by sheep.
- 2.3 The site (excluding cable route) is largely surrounded by agricultural land, with a small wooded area and pond to the north and another pond to the south-west. There are no statutory designated sites within 2km of the site. The nearest statutory designated site is the Pembrokeshire Marine Special Area of Conservation ("SAC") and Milford Haven Waterway Site of Special Scientific Interest ("SSSI"), located approximately 2.2km north-west of the site. There are 56 non-designated sites within a 2km radius of the site and these are all ancient woodland.
- 2.4 The site does not contain any Public Rights of Way, nor any Public Bridleways. There are, however, public footpaths and bridleways to the east of the site, running north to south, namely Bridleway SP26/1/3 and Bridleway SP26/5/1.
- 2.5 The site is not subject to any landscape related designations, though it lies adjacent to Pembrokeshire Coast National Park, with Bluestone Resort and Oakwood Theme Park in between.
- 2.6 There are 38 previously recorded sites of heritage/archaeological interest within 1km of the site, including two Listed Buildings:
- Grade II listed Mounton Quarry Limekiln found c. 750m to the east of the site.
  - Grade II listed Mounton Chapel, found in an isolated position, c. 1.35km to the north-east of the site.
- 2.7 There are an additional four areas of archaeological interest within the site boundary, which are all areas of probably Post-Medieval surface quarrying. There are also eight Scheduled Monuments within 3km of the site.

- 2.8 The site also lies within a hard rock resource area.
- 2.9 The site has been selected to maximise the energy yield whilst avoiding any sensitive areas, and being well screened from its surroundings by hedgerows and trees, which will not be affected by the proposal.

## Section 3: Proposed Development

- 3.1 The proposed development comprises a solar farm of circa. 3MW. The solar farm would consist of free standing, static solar photovoltaic (PV) panels. The solar farm would be designed to supply power directly to Bluestone, with any excess energy exported to the Grid.
- 3.2 The solar farm will have a project lifespan of 30 years. The proposal is fully reversible so that any visual impacts are temporary in nature and the land can be restored following relatively minor decommissioning works.
- 3.3 The proposal would comprise the following:
- PV panels and associated supporting frames;
  - String inverters, attached to the underside of the panels;
  - Energy Storage System (ESS) comprising a battery;
  - Inverter for the battery;
  - Transformer station;
  - Substation;
  - Associated cabling (below ground);
  - Perimeter fencing, gate and inward facing infra-red (invisible) CCTV;
  - Access track;
  - Temporary construction compound.

### Solar Panel Modules

- 3.4 The proposed solar farm will be made up of solar panels, consisting of crystalline cells of silicon wafers and semi-conducting materials applied to glass plate. When sunlight hits the solar cells a voltage develops between the treated silicone and the semi-conductor material and direct current (DC) is generated.
- 3.5 The panels will be arranged in rows in a west to east alignment across the field and will be angled between 10° and 35° to the horizontal and orientated south. The solar panels will be mounted in pairs, one above the other, on frames, giving an overall maximum height of approximately 3m above the ground (height between 2.3m to 3m); the lowest part of the panel will be circa. 0.7m above ground level (between 0.7 to 1m above ground). The rows of panels will be set between 1.5m and 3m apart to avoid shadowing and to allow for scheduled maintenance.

3.6 The mounting frames will be matt finished galvanised steel with steel posts of circa 20cm diameter, driven (screwed or piled) into the ground, without the need for concrete foundations to a depth of approximately 1.5m. The mountings are then assembled by hand.

3.7 Due to commercial constraints and potential changes in solar panel manufacturing, at the time of prospective granting of planning permission, some element of flexibility is required in relation to the details of the panels, their peak output and their arrangement. For this reason, we have set out a range in respect of maximum height, height above ground and angle of the panels. The Typical PV Panel Detail (Drawing Ref: Bluestone 903) provides an indicative specification of the panel and frame.

### **String Inverters**

3.8 The solar arrays will be connected to string inverters attached to the underside of the panels. Inverters are required to convert the direct current (DC) generated by the PV panels to grid compatible alternative current (AC).

### **Energy Storage System**

3.9 The Energy Storage System (ESS) comprises a circa. 2MW battery within a prefabricated 20ft container (Drawing Ref: TPS-E 20ft HC layout plan).

### **Inverter for the Battery**

3.10 Inverter for the battery, which charges and discharges the battery. The inverter would be housed in a prefabricated container (Drawing Ref: TR17 EKV0091).

### **Transformer**

3.11 Electricity from the inverters will be transferred to the proposed on-site transformer, which steps up the voltage from 400 volts to 11,000 volts. The transformer would be housed in a prefabricated substation container (Drawing Ref: Bluestone 905).

### **Substation**

3.12 The substation allows electricity to be transferred to Bluestone. The substation is housed in a prefabricated container (Drawing Ref: TR17 EKV0091).

### **Cabling**

3.13 The cabling / service connections required to transfer energy from the panels to the substation, including earthing traps, DC cables and AC cables will be provided within associated trenches to accommodate them. The cabling trench will vary from 300mm to



1100mm depending on whether they are for earthing, DC or AC cabling or medium voltage cabling.

### **Perimeter Fencing and Gates**

- 3.14 A 1.9m timber post and wire fence is erected around the site for health, safety and insurance purposes. Matching gates are provided at key access points at the site.

### **Access Track**

- 3.15 The access track would comprise matting tiles, which the grass would grow through. The matting tiles would be rolled into the ground and no excavation would be required. The route of the access track from the A4075 is shown on our Proposed Site Layout (Drawing Ref: Bluestone 101, Rev. E).

### **Construction (including temporary compound)**

- 3.16 The construction phase of the development would typically take between 2 to 3 months to complete.
- 3.17 A temporary site compound (fenced off area) will be necessary for the storage of equipment, materials, welfare facilities and vehicle car parking. The approximate location of the temporary compound is shown on our Proposed Site Layout (Drawing Ref: Bluestone 101, Rev. E).
- 3.18 The limited noise and traffic associated with construction will be kept within reasonable daytime working hours.

### **Operation**

- 3.19 The solar farm will begin operation following construction and connection to Bluestone. The solar panels will generate for the project lifespan of 30 years.
- 3.20 Once operational, the development would largely be autonomous, and visits would be limited to around once every three months for maintenance purposes.

### **Decommissioning**

- 3.21 The solar farm is designed to be fully reversible at the end of the lifetime of the project. Solar panels, cabling, inverters, sub-station and other paraphernalia are removed leaving only small holes, trenches and areas to be back filled. The land can be reverted to its previous use.

## **Section 4: Design and Access Considerations**

4.1 This Section is structured and based on the Design and Access Statements in Wales (April 2017) guidance note and Technical Advice Note 12: Design (TAN 12), both issued by the Welsh Government.

### **Design Process**

4.2 Site selection is a critical aspect of the solar farm development process. The selection process is based on a number of factors including the distance of the facility to the point of connection, proximity to sensitive receptors (such as residential properties and ecological sites), site orientation and inclination, ground conditions, current use of the land and vehicle access. A review of potential sites was undertaken in respect of their suitability for solar and to enable the connection point with Bluestone.

4.3 Based on the high-level selection criteria mentioned above, the site was considered suitable to accommodate a solar farm of circa. 3MW. Detailed assessments in respect of ecology, landscape, heritage and archaeology were then undertaken by consultants to identify the likelihood of any significant environmental impacts resulting from the proposal on identified receptors. The assessments confirmed that the site had been carefully selected to minimise impacts that might have surfaced on a more sensitive site (Section 6 of this Statement provides further detail).

4.4 The following section sets out the design and access considerations taken into account in accordance with Welsh Government guidance.

### **Character**

#### ***Placemaking***

4.5 The application site is located to the south-west of Narberth. The site is predominantly pastureland bounded by heavy vegetation of relatively few species and is fairly undulating in its topographical make-up.

4.6 The solar farm will provide Bluestone with renewable energy and help to increase the viability of the resort by reducing their operating costs. Bluestone are a key local employer and diversification such as renewable energy sources to power the resort will help strengthen the business and rural economy.

#### ***Amount and Density***

4.7 The site comprises agricultural land of approximately 4.8 hectares, which includes the cable

route. The solar farm will have an output of circa. 3MW per annum.

### ***Spaces and Public Density***

4.8 Due to the nature of the development there is no public access to the site.

### ***Scale***

4.9 The scale of the proposal (in terms of its viability as a solar farm) is determined by the topography of the site, connection and ownership constraints. The scale of the proposal is considered to be acceptable in its context seeking to maximise the amount of renewable energy generated while minimising any adverse impacts.

### ***Layout***

4.10 The layout has been designed in such a way as to retain the existing field boundary features such as trees, hedges and ditches so not to change the nature of the existing field boundaries within the landscape context. The final layout is enclosed as part of the application submission and is a result of several revisions in response to various technical assessments.

### ***Detailed Design***

4.11 The details of the proposed solar farm are contained in Section 3 of this Statement and are not repeated here.

### ***Access***

4.12 This section assesses the accessibility of the proposed development, particularly regarding construction traffic.

4.13 Access to the site will be via a new access track from the A4075 to the east of the site. The access track will comprise matting tiles, which grass will grow through. The tiles would be rolled into the ground and no excavation is required. These tiles have been selected to minimise the visual impact of the proposal, while enabling safe access during construction and maintenance of the site.

### ***Public Transport Accessibility***

4.14 It is not expected that staff will access the site via public transport due to its relatively remote location and car sharing as an alternative.

### ***Disabled Access***

4.15 The site will not be open to members of the public and therefore will only be accessed by authorised personnel (i.e. those tasked with constructing and maintaining the site).

- 4.16 It will be ensured that any construction and maintenance staff with disabilities will be able to access the site, it may not be possible to provide universal access due to the inherent characteristics of the development.

### **Movement**

- 4.17 The majority of traffic associated with the proposal will be experienced during the construction phase, which is expected to take between 3 and 4 months.
- 4.18 During the construction period, delivery vehicles and construction staff will make vehicular trips to and from the site.
- 4.19 HGV volumes and timings cannot be confirmed at this stage and will be dependent on a number of factors such as shipping schedules. There would be approximately an average of 1 HGV delivery per day. As all deliveries will result in a return journey for the vehicle there will be up to an average of 2 vehicle movements per day.
- 4.20 Following these deliveries, it is envisaged that deliveries to the site will be fewer in number as the solar farm is constructed from material already delivered to site and stored within the temporary construction compound.

### **Trip Generation Staff**

- 4.21 An estimated 10 staff will be on site during the construction phase, depending on the phases of the construction schedule. It is envisaged that staff trips will be mainly made by private vehicles. All vehicle parking will be provided within the temporary construction compound, there will be no parking on the public highway.
- 4.22 Due to the proposed hours (07:00 to 18:30 hours weekdays) of construction the majority of these trips are expected to take place outside of traditional peak periods and will be temporary in any case.
- 4.23 The site will be laid out to accommodate all staff vehicles as well as the expected HGV delivery vehicles.

### **Site Operation**

- 4.24 The site will operate for a period of 30 years. During its lifetime the site does not require any permanent staff presence. Upkeep of the site is restricted to infrequent monitoring, cleaning and general maintenance.
- 4.25 The frequency of vehicular trips is expected to be no more than 4 visits per year.

### **Environmental Sustainability**

- 4.26 The proposal will contribute towards Welsh Government and UK Government renewable energy and carbon reduction targets and provide cost effective and clean electricity.

### **Community Safety**

- 4.27 In respect of community safety, only authorised personnel will be permitted to enter the site which will be enclosed with a 1.9m wooden post and wire fence. Matching gates will be provided. The tenant farmer will continue to farm the land and surrounding area providing natural surveillance. The proposal raises no community safety issues.

## Section 5: Planning Policy Context

- 5.1 The following section provides an overview of the relevant planning policy framework relating to the application proposal. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, this application should be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 5.2 The statutory Development Plans comprise Future Wales: The National Plan 2040 and the Pembrokeshire County Council Local Development Plan: Planning Pembrokeshire's Future (up to 2021) ("LDP"). Material planning considerations include policies contained within Planning Policy Wales (Edition 11, February 2021) ("PPW") and guidance within Pembrokeshire Supplementary Planning Guidance ("SPG").

### Statutory Development Plans

#### Future Wales: The National Plan 2040

- 5.3 Future Wales is the national development framework for Wales and has development plan status.
- 5.4 The Welsh Government strongly supports the principle of developing renewable and low carbon energy and Wales has the opportunity to become a world leader in renewable energy technology.

*"Our wind and tidal resources, our potential for solar generation, our support for both large and community scaled projects and our commitment to ensuring the planning system provides a strong lead for renewable energy development, mean we are well placed to support the renewable sector, attract new investment and reduce carbon emissions" (Page 48)*

- 5.5 Future Wales sets out 11 Outcomes, which it seeks to achieve over the next 20 years through the planning system by providing "... *quality development in the right places for the right reasons*". Outcome 11 aims to create places:

*"... which are decarbonised and climate resilient ... the planning system must help Wales lead the way in promoting and delivering a competitive, sustainable decarbonised society" (Page 56)*

- 5.6 Wales is abundant in opportunities to generate renewable energy and the Welsh Government is committed to maximising this potential. Generating renewable energy is a key part of the Welsh Government's commitment to decarbonisation and tackling the

climate emergency. The Welsh Government have set the following ambitious targets:

- *"For 70% of electricity consumption to be generated from renewable energy by 2030.*
- *For one gigawatt of renewable energy capacity to be locally owned by 2030.*
- *For new renewable energy projects to have at least an element of local ownership from 2020."* (Page 96)

### **Pembrokeshire County Council Local Development Plan**

5.7 Pembrokeshire County Council Local Development Plan: Planning Pembrokeshire's Future (up to 2021) was adopted on 28<sup>th</sup> February 2013 and comprises the statutory Development Plan for the area. The relevant policies contained within the LDP are as follows:

5.8 Policy SP1 Sustainable Development, requires all development proposals to demonstrate how positive economic, social and environmental impacts will be achieved and adverse impacts minimised.

5.9 Policy GN.1 General Development Policy, provides a framework for the evaluation of potential development impacts. In summary, the policy states that development will be permitted where:

- The development is compatible with the capacity and character of the site and area;
- Would not result in a significant detrimental impact on local amenity;
- Would not adversely affect landscape character, quality or diversity;
- Respects and protects the natural environment;
- Would take place in an accessible location, without having a detrimental impact on highway safety or in traffic exceeding the capacity of the highway network;
- There is necessary and appropriate service infrastructure;
- It would not cause unacceptable harm to health and safety;
- It would not have a significant adverse impact on water quality; and
- It would neither contribute to the coalescence of distinct settlements nor create or consolidate ribbon development.

5.10 Policy GN.2 Sustainable Design, permits development where it includes good design, is appropriate to the local character and landscape/townscape, incorporates a resource

efficient and climate responsive design, achieves a flexible and adaptable design, creates an inclusive and accessible environment, provides good quality public realm and contributes to delivering well-designed outdoor space.

- 5.11 Policy GN.4 Resource Efficiency and Renewable and Low-carbon Energy Proposals, supports development which enables the supply of renewable energy through environmentally acceptable solutions. Development proposals are required to seek to minimise resource demand, improve resource efficiency and seek power generated from renewable resources, where appropriate.
- 5.12 Policy GN.22 Prior Extraction of Mineral Resource, requires where the development is permitted in an area of mineral resource, for minerals to be extracted prior to the commencement of development, wherever appropriate in terms of economic feasibility and environmental and other planning considerations.
- 5.13 Policy GN.37 Protection and Enhancement of Biodiversity, requires all development to demonstrate a positive approach to maintaining and, wherever possible, enhancing biodiversity.
- 5.14 Policy GN.38 Protection and Enhancement of the Historic Environment, only permits development that affects sites and landscapes of architectural and/or historical merit or archaeological importance, or their setting, where it can be demonstrated that it would protect or enhance their character and integrity.

## **Material Planning Considerations**

### **Planning Policy Wales**

- 5.15 PPW sets out the land use policies of the Welsh Government.
- 5.16 The Welsh Government's planning policy recognises an energy hierarchy. Reducing energy demand and increasing energy efficiency are at the top of that hierarchy respectively. Crucially, where energy is required it should come from renewable energy generation. This is followed by a need to minimise the carbon impact of other energy generation and extraction of carbon intensive energy materials. All these aspects of the energy hierarchy have their part to play in helping meet decarbonisation and renewable energy targets (Figure 10 and Para 5.7.13).
- 5.17 PPW sets out key planning principles in order to achieve the right development in the right place. One of the key principles "*Making best use of resources*" states:

*"The planning system has a vital role to play in making development resilient to climate change, decarbonising society and developing a circular economy for the*



*benefit of both the built and natural environments and to contribute to the achievement of the well-being goals.” (Figure 4)*

5.18 PPW seeks to secure an appropriate mix of energy provision. Paragraph 5.7.7 states:

*“The benefits of renewable and low carbon energy, as part of the overall commitment to tackle the climate emergency and increase energy security, is of paramount importance ... The planning system should ... Maximise renewable and low carbon energy generation”*

5.19 PPW seeks to ensure that renewable and low carbon energy is delivered in a suitable location and supported by a sufficient policy basis. Paragraph 5.9.1 states:

*“Local authorities should facilitate all forms of renewable and low carbon energy development... planning authorities should seek to ensure their area’s full potential for renewable and low carbon energy generation is maximised and renewable energy targets are achieved.”*

5.20 Paragraph 5.9.11 states:

*“The Welsh Government encourages the use of local renewable and low carbon energy as part of the imperative to reduce carbon emissions. Renewable and low carbon energy developments offer significant potential for communities and small businesses to develop their own projects for local benefit.”*

5.21 Paragraph 5.9.20 states:

*“Planning authorities should ensure development plan policies are supportive of renewable and low carbon energy development in all parts of Wales...”*

5.22 The Distinctive and Natural Places theme in PPW (Chapter 6) covers the historic environment, landscape, biodiversity and habitats, among other environmental risks. Paragraph 6.02 states:

*“The special and unique characteristics and intrinsic qualities of the natural and built environment must be protected in their own right, for historic, scenic, aesthetic and nature conservation reasons. These features give places their unique identity and distinctiveness and provide for cultural experiences and healthy lifestyles.”*

5.23 In respect of historic assets (which includes archaeological remains), Paragraph 6.17 states:

*“It is important that the planning system looks to protect, conserve and enhance the*

*significance of historic assets. This will include consideration of the setting of an historic asset which might extend beyond its curtilage. Any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way.”*

5.24 In respect of landscape, Paragraph 6.3.3 states the need to:

*“... ensuring statutorily designated sites are properly protected and managed;*

*• ensuring that the value of all landscapes for their distinctive character and special qualities is protected; and*

*• ensuring the opportunities landscapes provide for tourism, outdoor recreation, local employment, renewable energy and physical and mental health and well-being are taken into account and multiple well-being benefits for people and communities secured.”*

5.25 In relation to biodiversity, Paragraph 6.4.3 states:

*“The planning system has a key role to play in helping to reverse the decline in biodiversity and increasing the resilience of ecosystems, at various scales, by ensuring appropriate mechanisms are in place to both protect against loss and to secure enhancement. Addressing the consequences of climate change should be a central part of any measures to conserve biodiversity and the resilience of ecosystems.”*

### **Technical Advice Notes (TANs)**

5.26 TANs provide detailed planning advice.

5.27 TAN 15: Design – The purpose of the TAN is to provide advice on how ‘Promoting sustainability through good design’ and ‘Planning for sustainable building’ may be facilitated through the planning system.

### **Pembrokeshire Supplementary Planning Guidance**

5.28 Relevant supplementary planning guidance (“SPG”) includes:

5.29 Renewable Energy (approved 31 October 2016) – The SPG elaborates on Plan policies seeking to balance the benefits that renewable energy development can have against the need to protect the natural and historic environment. It focuses primarily on solar, wind and biomass energy.

5.30 Biodiversity SPG (approved May 2021) – The SPG provides guidance on legal responsibilities, obligations and the protection, conservation and enhancement of

biodiversity during the development process.

- 5.31 Historic environment SPG (approved May 2021) – The SPG provides detailed information regarding how planning applications with the potential to impact upon archaeology within Pembrokeshire will be dealt with. It also provides information on the way in which Development Plan policies will be applied.
- 5.32 Draft Landscape Character Assessment (July 2019) (“LCA”) – The draft LCA will help understand the range and diversity of landscapes in Pembrokeshire (outside the National Park) and the elements which contribute to them. The LCA identifies 29 distinct landscape character areas. For each landscape character area, key characteristics and qualities are set out. Changes to the landscape including past and present changes, alongside future changes and key sensitivities enables guidelines to protect, conserve or enhance areas.

## **Section 6: Assessment of the Proposal**

6.1 This Chapter assesses the development proposal against the planning policy framework set out in Chapter 4. The key planning issues relevant to the consideration and determination of this planning application include the following:

- Principle of Development;
- Design and Access;
- Ecology;
- Landscape;
- Heritage and Archaeology; and
- Mineral Resource.

### **Principle of Development**

6.2 The principle of renewable energy development, both large and community scaled projects, are supported by the Welsh Government and Pembrokeshire County Council. As set out in Section 5 of this Statement, the Welsh Government through Future Wales and PPW aim to ensure the planning system provides a strong lead for renewable energy development to tackle climate change and create a decarbonised society.

6.3 The proposed solar farm will provide a direct, clean, renewable source of energy generation directly to Bluestone, a local employer and large consumer of energy. The proposed development will help to minimise Bluestone's resource demand, reduce long term running costs to Bluestone and assist in meeting the Welsh Government's targets to tackle climate change.

6.4 The application site is located in the countryside, outside settlement boundaries. LDP Policy GN.4 is relevant and supports developments which enable the supply of renewable energy through environmentally acceptable solutions. The proposed solar farm will provide renewable energy generation with a functional link between the solar farm (source of power) and the user (Bluestone), as supported in the text accompanying LDP Policy GN.4. The principle of development in this countryside location is acceptable in principle subject to proposals being compatible with the LDP's other policies and material considerations, which are assessed in the following sections.

### **Design and Access**

6.5 Good design is intrinsic to this solar farm proposal, with site selection a crucial part of the design process in order to minimise any potential environmental impacts. The proposal is

well screened from the surrounding area by dense hedgerows and trees. The proposal by its very nature is sustainable, providing low cost green energy to Bluestone and its 30 year lifespan provides flexibility, allowing the land to be fully restored at the end of its lifespan.

- 6.6 In respect of access, existing field gates will be used as access points to ensure all hedgerows and trees remain. Matting tiles which allow grass to grow through them are also proposed for the new access track, to minimise the impact on the landscape while ensuring safe access. The proposal is therefore in accordance with LDP Policies GN.1 and GN.2 and TAN 15.

### **Ecology**

- 6.7 A Preliminary Ecological Report ("PEA") was prepared by BSG. A Phase 1 Habitat Survey of the site was completed on 9<sup>th</sup> June 2021 and the survey was extended to include an assessment of the suitability of the habitats present to support protected (and non-native invasive species).

### ***Statutory designated sites***

- 6.8 The proposed development will not result in direct impacts or indirect impacts on the Pembrokeshire Marine SAC due to distance, lack of hydrological connection and the absence of any habitats that would support SAC qualifying features within the proposed development site.
- 6.9 Greater and lesser horseshoe bats are qualifying features of the Bosherton lakes SAC, and notified features of the Slebech Stable Yard, Loft, Cellars and Tunnels SSSI and The Milford Haven Waterway SSSI.
- 6.10 The grassland within the site is unlikely to provide an important foraging resource for SAC populations of bats, given the current land management (sheep grazing) and availability of similar habitats in the area. The hedgerows surrounding the site are potentially used as commuting corridors and the proposed development does not require the removal of any of these hedgerows or trees.

### ***Non-statutory designated sites***

- 6.11 There are no non-statutory designated sites within, or adjacent to the proposed development. Impacts on local areas of ancient woodland are unlikely to occur.

### ***Habitats***

- 6.12 Habitats within the site, including hedgerows and boundary woodland are of ecological interest due to their potential to support protected species. All habitats at the site will be

retained, with access to the site through existing field gates, which will avoid any reductions in local ecological connectivity.

### ***Protected Species***

- 6.13 In general, by avoiding impacts on hedgerows and woodland, the requirement for further targeted species should be unnecessary. However, the PEA sets out mitigation measures in respect of bats, birds, reptiles and amphibians and protected mammals, that would be followed and further surveys that may be required if any hedgerows or trees are to be lost.
- 6.14 Enhancement measures proposed to benefit habitats and protected species may include:
- Relaxation of hedgerow management along the northern and western boundaries of the site (as far as possible without shading the panels) to strengthen commuting routes for bats and enhance breeding bird habitat.
  - Increase the species diversity of retained grassland along field boundaries within the site. This may be achieved through reducing grazing pressure and adapting cutting regimes to allow grasses and other plants to pollinate and set seed. This would benefit invertebrate diversity, provide an enhanced foraging resource for bats, and cover for reptiles and mammals.
  - Provision of bat and / or bird boxes in trees and woodland edge within the site.
- 6.15 The proposed development is sensitive and will protect, maintain and where possible enhance biodiversity, in accordance with LDP Policy GN.37, the Biodiversity SPG and Chapter 6 of PPW.

### **Landscape**

- 6.16 A Landscape and Visual Appraisal (LVA) was prepared by EDP. The site falls outside any landscape designations and has carefully been selected to minimise landscape and visual impacts that otherwise might have surfaced on a more sensitive site.
- 6.17 The site lies adjacent to Pembrokeshire Coast National Park. However, from EDP's assessment the site is not visible from the National Park and is screened by vegetation, with Oakwood Theme Park in the foreground intercepting most views.
- 6.18 The effects on landscape character are judged to be negligible, with the main effect being loss of a single agricultural field. However, the field will still be used for sheep grazing around and under the panels. The site will still include features commensurate with what the local character assessment describes, such as narrow-wooded streams to the north and east of the site and the relatively low lying landform.

- 6.19 The overall effects on visual amenity are also judged to be negligible, given the limited views into the site from key external areas. The only point from where the development will see glimpsed views is to the north-eastern high ground, on bridleway SP26/1/3, near Canaston Wood.
- 6.20 The site presents a well-hidden, low impact proposal to assist Bluestone with a clean, renewable energy source. The development's limited negative effects are considered acceptable in landscape terms on a site that is best placed for this kind of development within its setting.
- 6.21 The proposed development would not adversely affect landscape character, quality or diversity including the special qualities of Pembrokeshire Coast National Park and is therefore in accordance with LDP Policy GN.1, the Draft Landscape Character Assessment (July 2019) SPG and Chapter 6 of PPW.

### **Heritage and Archaeology**

- 6.22 A Heritage and Archaeological Desk-Based Assessment was prepared by Archaeology Wales.
- 6.23 There are 38 previously recorded sites of heritage/archaeological interest within 1km of the site, and this includes two listed buildings. None of these sites lie within the proposed development area. Although three new areas of archaeological interest within the site boundary were identified on a site visit. These sites are all probably areas of Post-Medieval quarrying. A further new asset, a surface quarry, was also identified immediately to the north-west of the site.
- 6.24 No Registered Historic Landscape, Conservation Area, Registered Historic Park and Garden, or Listed Building will be directly or indirectly affected by the proposed development.
- 6.25 There are eight Scheduled Monuments within 3km of the site. Of these, none will be directly impacted by the development and only one, Minwear Ringwork, has the potential to be indirectly impacted. However, the visual impact would be limited due to the distance and intervening vegetation and is likely to be minor.
- 6.26 There is low potential for further unrecorded activity spanning the Prehistoric to the Post-Medieval periods, with surface quarrying activity likely to have affected any earlier remains. The earthworks (areas of archaeological interest) identified are most likely to be of Post-Medieval date, as both surface quarrying of limestone and the presence of limekilns are well-attested in map evidence. The surface quarries are considered to be of local importance and are therefore of low archaeological value. The proposed development may

have a moderate direct impact on these surface quarries.

- 6.27 The proposed development would not affect any designated heritage or archaeological assets in accordance with LDP Policy GN.38, the Historic Environment SPG and Chapter 6 of PPW.

### **Mineral Resource**

- 6.28 The site lies within a hard rock resource. Prior extraction of the mineral resource at this time would not be appropriate in terms of need, economic feasibility or environmental considerations. The LDP 2 Minerals Background Paper indicates that the landbank for hard rock is plentiful, with every prospect that a generous landbank will remain at the end of the plan period (plan period ends 2033 and hard rock resources will be expected to be sufficient to last until 2043).
- 6.29 The proposed solar farm would have a lifespan of approximately 30 years and the land can then be returned to agricultural use or if required after the solar farm is decommissioned the hard rock resource could be extracted. It is therefore considered, that the proposed development would comply with LDP Policy GN.22.



## **Section 7: Conclusion**

7.1 This Planning, Design and Access Statement outlines the context within which this application is made and provides an assessment of the key planning, design and access considerations together with reasoned justification in support of the proposed solar farm.

7.2 In summary, on the basis of a comprehensive review of planning policy and the physical context of the application site, the site is considered to be suitable for development and the proposal should be viewed favourably for the following reasons:

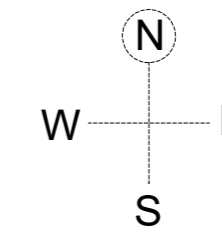
- The proposal would generate renewable energy directly to a key local employer, which has a large energy consumption.
- The solar farm would contribute towards the Welsh Government's target for 70% of electricity consumption to be generated from renewable energy by 2030.
- The site was carefully selected to minimise landscape, ecology, heritage and archaeology, and amenity impacts, that otherwise might have surfaced on another site.
- The land under the solar panels can continue to be used for sheep grazing, increasing land productivity.
- The proposed development would have a lifespan of approximately 30 years, at which point the solar arrays can be removed and the site returned to agricultural land.
- The proposed solar farm is considered to be in accordance with Future Wales, the LDP and material planning considerations, all of which support renewable energy projects.

7.3 The principle of development at the site is acceptable and the detailed proposal represents an appropriate and policy compliant scheme. There are no technical constraints that preclude or constrain development within the site. The proposal will generate much needed renewable energy on a deliverable site by a local developer. Having regard to the considerations outlined in this Statement, it is considered that the application is acceptable and should be granted planning permission.

# **Appendix 1:**



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Notes

1. Do not scale to ascertain dimensions.
2. All dimensions to be checked and verified on site prior to commencement of work.
3. The building and site were surveyed for the stated scale and any subsequent enlargements should be verified on site.
4. All levels are in metres and relate to the stated Bench Mark.
5. Copyright for all designs and drawings in whole or in part shall remain with Infinite Renewables Limited in accordance with The Copyright Act.

REV	DATE	DESCRIPTION	SURV
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CLIENT: Infinite Renewables	SCALE: 1:2500@A2
PROJECT: Land at Bluestone Narberth, Pembrokeshire	DATE: 04/11/2021
DRAWING: Location Plan	DRAWN: RS
	CHECKED: GJ
DRAWING No: Bluestone 201	REVISION: C

Infinite  
Number One,  
Waterton Park  
Bridgend  
Wales  
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