

## EIA Scoping Direction

# DNS CAS-03072-D7X6N7 – Alleston Solar Farm

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**This Scoping Direction is provided on the basis of the information submitted to Planning and Environment Decisions Wales on 10 November 2023, in addition to consultation responses received. The advice does not prejudice any recommendation made by an Inspector or any decision made by the Welsh Ministers in relation to the development, and does not preclude the Inspector from subsequently requiring further information to be submitted with the submitted DNS application under Regulation 24 of [The Town and Country Planning \(Environmental Impact Assessment\) \(Wales\) Regulations 2017 \(as amended\)](#) (“The 2017 Regulations”).**

## 1. Introduction

Planning and Environment Decisions Wales (PEDW) received a request under [Regulation 33](#) of the 2017 Regulations for a Scoping Direction in relation to a proposed development for Ground mounted photovoltaic solar farm with a capacity of up to 49 MW together with associated equipment, infrastructure and ancillary works by Alleston Clean Energy Ltd.

The request was accompanied by a Scoping Report (SR) [Ref: 32516/A5/EIAScoping, Environmental Impact Assessment Scoping Report, November 2023] that outlines the proposed scope of the Environmental Statement (ES) for the proposed development. To view the scoping report online, go to <https://planningcasework.service.gov.wales/> and search **CAS-03072-D7X6N7**.

Planning and Environment Decisions Wales (PEDW) is authorised to issue this Scoping Direction on behalf of the Welsh Ministers.

This Direction has been prepared in accordance with the requirements of the 2017 Regulations as well as current best practice towards preparation of an ES. In accordance with the 2017 Regulations PEDW has consulted on the SR and the responses received from the consultation bodies have been duly considered in adopting this Direction.

## 2. Site Description

The site is located at Alleston Farm, Pembrokeshire, south-east of Pembroke town, within the Pembrokeshire County Council Area. The site is surrounded by agricultural fields and is bounded with buildings associated with Alleston Farm and a pocket of woodland (Alleston Wood) at the south.

Further information is available in section 2.1 of the SR.

## 3. Proposed Development

The proposal as described in the Scoping Report is for the construction, temporary operation and decommissioning of a 49 MW solar farm and associated equipment such as inverters, transformer stations, substation, fencing, CCTV and cabling. Connection to the electricity grid will be via the 132 kV overhead pylon which crosses the site. The solar farm development will have an operational lifespan of 40 years, after which it will be decommissioned.

Further information is available in section 2.4 of the SR.

The scope of the EIA should include all elements of the development as identified in the SR, both permanent and temporary, and this Scoping Direction is written on that basis.

In line with the requirements of [Regulation 17](#) and [Schedule 4](#) to the 2017 Regulations, any reasonable alternatives considered should be presented in the ES. The reasons behind the selection of the chosen option should also be provided in the ES, including where environmental effects have informed the choices made.

#### 4. Consultation

In line with [Regulation 33\(7\)](#) of the 2017 Regulations, formal consultation was undertaken with the following bodies:

- Pembrokeshire County Council (LPA)
- Transport Directorate, Welsh Government
- Agricultural Land Use & Soil Policy, Welsh Government (LQAS)
- Natural Resources Wales (NRW)
- Cadw
- Civil Aviation Authority (CAA)
- Defence Infrastructure Organisation (DIO)
- Health and Safety Executive (HSE)
- Dwr Cymru Welsh Water
- Mid and West Wales Fire and Rescue Service

Responses received are included in **Appendix 1**.

Additional consultation was undertaken with:

- Pembrokeshire Coast National Park Authority (Neighbouring LPA)

#### 5. Environmental Impact Assessment Approach

The Applicants should satisfy themselves that the ES includes all the information outlined in [Schedule 4](#) of the 2017 Regulations. In addition, the Applicant should ensure that the Non-Technical Summary includes a summary of all the information included in Schedule 4. Consider a structure that allows the author of the ES and the appointed Inspector and Decision Maker to readily satisfy themselves that the ES contains all the information specified [Regulation 17](#) and Schedule 4 of the 2017 Regulations. Cross refer to the requirements in the relevant sections of the ES, and include a summary after the Contents page that lays out all the requirements from the Regulations and what sections of the ES they are fulfilled by.

As the assessments are made, consideration should be given to whether standalone topic chapters would be necessary for topics that are currently proposed to be considered as part of other chapters, particularly if it is apparent that there are significant effects and a large amount of information for a particular topic.

There may also be topic areas scoped out of the ES where the developer may wish to include application documents that sit outside of the ES and provide information that will support their consultation(s) and the decision-making process. The developer is encouraged to liaise with key consultees regarding non-ES application documents which are not a legislative requirement of the DNS regime. If agreement cannot be reached over non-ES application documentation,

then the developer may wish to explore whether PEDW can help provide clarity via its statutory pre-application advice service.

The ES should focus on describing and quantifying significant environmental effects. Policy considerations / arguments relating to those impacts should be addressed in other documentation supporting the application (e.g. a Planning Statement), which cross references the ES where necessary. This does not imply that ES chapters should not be prepared in accordance with relevant advice in policy documents (e.g. Technical Advice Notes), rather that the ES should concentrate on identifying significant effects on the environment rather than dealing with policy arguments or exhaustively listing policies.

### 5.1 Baseline

[Schedule 4](#) of the 2017 Regulations states that the 'baseline scenario' is "A description of the relevant aspects of the **current** state of the environment" (emphasis added). The baseline of the ES should reflect actual current conditions at that time.

### 5.2 Reasonable Alternatives

In line with the requirements of [Regulation 17](#) and [Schedule 4](#) to the 2017 Regulations, any reasonable alternatives studied by the Applicant should be presented in the ES. The reasons behind the selection of the chosen option should also be provided in the ES, including where environmental effects have informed the choices made.

It is worth bearing in mind that under the [Conservation of Habitats and Species Regulations 2017](#) ("the Habitats Regulations") unless it can be clearly shown to the Welsh Ministers that the project would have no adverse effect on the integrity of any designated sites, it would have to be shown that there is no feasible alternative solution (see advice note from [IEMA](#)). Further advice regarding the Habitats Regulations is provided in the final chapter of this Scoping Direction.

### 5.3 Currency of Environmental Information

For all environmental aspects, the applicant should ensure that any survey data is as up to date as possible and clearly set out in the ES the timing and nature of the data on which the assessment has been based. Any study area applied to the assessments should be clearly defined. The impacts of construction, operation and decommissioning activities should be considered as part of the assessment where these could give rise to significant environmental effects. Consideration should be given to relevant legislation, planning policies, and applicable best practice guidance documents throughout the ES.

The ES should include a chapter setting out the overarching methodology for the assessment, which clearly distinguishes effects that are 'significant' from 'non-significant' effects. Any departure from that methodology should be described in individual aspect assessment chapters. Where professional judgement has been applied this should be clearly stated.

The ES topic chapters should report on any data limitations, key assumptions and difficulties encountered in establishing the baseline environment and undertaking the assessment of environmental effects.

## 5.4 Cumulative Effects

The Planning Inspectorate's guidance for Nationally Significant Infrastructure Projects – [Advice Note 17: Cumulative Effects Assessment](#) sets out a staged process for assessing cumulative impacts which the Applicant should follow when preparing the list of projects for inclusion in the ES; the Applicant should ensure that relevant schemes identified are addressed in the ES using the tiered approach set out in Advice Note 17.

Based on the information set out in the scoping request, the approach to the assessment of cumulative impact is considered largely appropriate. Effects deemed individually not significant from the assessment, could cumulatively be significant, so inclusion criteria based on the most likely significant effects from this type of development may prove helpful when identifying what other developments should be accounted for. The criteria may vary from topic to topic.

Best practice is to include proportionate information relating to projects that are not yet consented, dependent on the level of certainty of them coming forward.

All of the other developments considered should be documented and the reasons for inclusion or exclusion should be clearly stated. Professional judgement should be used to avoid excluding other developments that are close to threshold limits but have characteristics likely to give rise to a significant effect, or could give rise to a cumulative effect by virtue of its proximity to the proposed development. Similarly, professional judgement should be applied to other development that exceeds thresholds but may not give rise to discernible effects. The process of refinement should be undertaken in consultation with the Local Planning Authorities, Cadw, NRW and other consultees, where appropriate.

The scope of the cumulative assessment should be fully explained and justified in the ES.

## 5.5 Mitigation

Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should provide reference to how the delivery of measures proposed to prevent/ minimise adverse effects is secured (through legal requirements or other suitably robust methods) and whether relevant consultees agree on the adequacy of the measures proposed.

## 5.6 Population and Human Health

The Applicant should ensure that the ES addresses any significant effects on population and human health, in light of the EIA Regulations 2017. This could be addressed under the separate topic chapters or within its own specific chapter.

## 5.7 Transboundary Effects

[Schedule 4 Part 5](#) of the EIA Regulations requires a description of the likely significant transboundary effects to be provided in an ES. The ES should address this matter as appropriate.

## 5.8 Topics Scoped In but not subject to a standalone chapter

For such topics it may be helpful to users of the ES if it includes a summary table that signposts the chapters where these matters are addressed.

## **6. Environmental Impact Assessment Aspects**

This section contains PEDW's specific comments on the scope and level of detail of information to be provided in the Applicant's ES. Environmental topics or features are not scoped out unless specifically addressed and justified by the Applicant and confirmed as being scoped out by PEDW. In accordance with Regulation 17(4)(c) the ES should be based on this Scoping Direction in so far as the Proposed Development remains materially the same as the Proposed Development described in the Applicant's Scoping Report.

PEDW has set out in this Direction where it has/ has not agreed to scope out matters on the basis of the information available at this time. PEDW is content that the receipt of a Scoping Direction should not prevent the Applicant from subsequently agreeing with the relevant consultees to scope such matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.



## **6.1 Aspects Scoped In**

Subject to the comments provided at Table 1, the following aspects are scoped into the ES:

**Human Health (not as a standalone chapter)**  
**Climate Change (not as a standalone chapter)**  
**External Lighting (not as a standalone chapter)**  
**Historic Environment**  
**Landscape and Visual Effects**  
**Agricultural Land and Soils**  
**Biodiversity**

## 7. Table 1: Planning and Environment Decisions Wales Comments

ID	Reference in Scoping Report	Issue	Comment
<b>Applicant's proposed Aspects proposed to be scoped out</b>			
ID.1	3.2.2	Human Health	PEDW agrees that it is not necessary to include a standalone chapter on Human Health, however it should be addressed in appropriate chapters of the ES. <b>This topic is therefore scoped into the ES, but not as a standalone chapter.</b>
ID.2	3.2.3	Air Quality	<p>The SR notes that significant effects on the environment with respect to air quality are unlikely and therefore air quality should be scoped out of the ES. It is noted that any potential impact on air quality would be as a result of construction vehicles and decommissioning however, mitigation measures will be outlined in a Construction Environment Management Plan (CEMP) and a DEMP (Decommissioning Environmental Management Plan).</p> <p>These documents should form technical appendices to the ES.</p> <p>PEDW agrees that Air Quality can be scoped out.</p>
ID.3	3.2.4	Noise and Vibration	<p>Due to the low levels of noise and vibration anticipated at the nearest sensitive receptors, the SR proposes to scope Noise and Vibration out of the ES.</p> <p>Noise should be addressed in the CEMP as requested by PCC and NRW in their responses as contained at Appendix 1. The SR also states that a Noise Assessment will be submitted with the planning application to consider noise and vibration during construction and decommissioning. PEDW is content with this approach, provided the requirements set out by PCC and NRW in Appendix 1 are met.</p>

ID	Reference in Scoping Report	Issue	Comment
ID.4	3.2.5	Transport	<p>There will be environmental impacts, such as noise and air quality, resulting from transport movements during the construction/decommissioning phases. The SR highlights that there will be very low vehicle movements associated with ongoing maintenance during the operational life of the solar farm.</p> <p>PCC include in their comments that a CEMP and a DEMP will be required to accompany a planning application to set out mitigation measures to address environmental impacts associated with transport, the specific requirements are outlined in their response in Appendix 1. PEDW agree to scope out Transport from the ES, provided that the environmental impacts associated with transport are addressed in the CEMP. This should be included as a technical appendix to the ES, as it is likely to outline relevant mitigation measures.</p> <p>PCC provide commentary regarding potential access option; the applicant should liaise directly with PCC on this matter.</p>
ID.5	3.2.6	Climate Change	<p>PEDW agrees that climate change does not need to be covered in a stand-alone chapter, however, the ES should contain information adequate to enable the decision maker to judge the likely impact on carbon emissions should permission be granted. <b>Climate change is therefore scoped in, but not as a standalone chapter.</b></p>
ID.6	3.2.7	Ground Conditions and Land Contamination	<p>NRW agree that land contamination can be scoped out of the ES due to the development being sited wholly on undeveloped agricultural land. The SR states that there will be no development of solar PV arrays or associated infrastructure on or adjacent to Historic Landfill Sites. Ground Conditions and Land Contamination are therefore scoped out.</p>
ID.7	3.2.8	Wind Microclimate	<p>Due to the height of the PV arrays and given that they are not located where there is public access, Wind Microclimate is scoped out.</p>
ID.8	3.2.9	Daylight, Sunlight and Overshadowing	<p>The SR notes that a glint and glare assessment will be undertaken and submitted with the planning application, no other impact is considered to result</p>

ID	Reference in Scoping Report	Issue	Comment
			from the development in terms of Daylight, Sunlight and Overshadowing and therefore it is scoped out of the ES.
ID.9	3.2.10	Water Resources and Flood Risk	<p>Whilst the majority of the site is within Flood Zone A of the Development Advice Map (DAM) NRW highlight that a very small area of is within Zone C2. The Flood Map for Planning identifies the application site to be at risk of flooding and partially falls into Flood Zone 2/3 Rivers/Sea.</p> <p>Pembrokeshire County Council (PCC) commented that there are no records of any flooding incidents to agricultural land within the site.</p> <p>The SR states that a detailed flood consequences assessment will be submitted as part of the application process. As the flood risk is considered to be low, Water Resources and Flood Risk can be scoped out of the ES.</p>
ID.10	3.2.11	Waste	The SR states that waste will be generated during the construction and decommissioning phases and only limited volumes of waste will be generated during the operational phase. The impact is therefore not considered to be significant; any potential impacts and mitigation measures will be set out in the CEMP and DEMP as requested by PCC and NRW in Appendix 1.
ID.11	3.2.12 – 3.2.13	External Lighting	PEDW agrees that a standalone chapter for external lighting is not necessary, however, it should be addressed in appropriate chapters of the ES, such as biodiversity, due to the potential impact of construction lighting and security lighting during operation on protected species. <b>This topic is therefore scoped into the ES, but not as a standalone chapter.</b>
ID.12	3.2.14 – 3.2.16	Major Accidents and Disasters	In their comments in Appendix 1, the Health and Safety Executive (HSE) note that the proposed development does not fall within the consultation distances of any Major Hazard Installation or Major Accident Hazard Pipelines. Major Accidents and Disasters are not considered to be likely, and it can therefore be scoped out of the ES.

ID	Reference in Scoping Report	Issue	Comment
<b>Historic Environment</b>			
ID.13	4.2.1 – 4.2.2 4.3 4.4	Archaeological Remains	<p>PCC note that Dyfed Archaeological Trust (DAT) find the approach outlined in the Scoping Report to address potential impacts of the development on the historic environment to be acceptable.</p> <p>The applicant's attention is drawn to CADW's comments in Appendix 1 regarding the Historic Environment Desk-based Assessment (HEDBA). CADW note that the HEDBA will need to include reviews of all relevant LIDAR information and should provide an appropriate initial assessment of the archaeological resource inside the proposed development area. They also note that if the work reveals that buried archaeological features are located inside the area that need further investigation, this work will need to be carried out before the EIA is completed.</p>
ID.14	4.2.3 – 4.2.5 4.3 4.4  Appendix 1	Built Heritage	<p>PCC note that the Heritage Note in the SR's appendix is considered to fail in its recognition of the Grade II curtilage listed status of the historic outbuildings. It is therefore necessary for this assessment to be revisited to give further regard to the significance of the historic outbuildings and their setting as a group.</p> <p>The SR identified that grade II listed building 84963 Alleston, is located within the development site boundary and the heritage note indicates that the development could have damaging effect on its setting. CADW commented that the EIA will need to fully consider this potential impact and identify measures that can be introduced into the design of the solar farm to mitigate this impact.</p> <p>The HEDBA will need to assess the impact of the proposed development on the setting on the identified historic assets, which are located inside 3 km of the proposed development, in accordance with CADW's comments in Appendix 1. CADW have included a list of historic assets in Annex A of their comments for</p>

ID	Reference in Scoping Report	Issue	Comment
	Figure 7.11		<p>which a stage 1 assessment is expected to be carried out to determine the need for stages 2 to 4. The results of Stage 1 should be included in the EIA as an appendix.</p> <p>The applicant's attention is drawn to CAWDs comments in Appendix 1 regarding the identified significant view from the registered grade II* Lamphey Bishops Palace &amp; Lamphey Court historic park and garden. In line with CADW's recommendation PEDW requires the location of identified significant view to be added to the photographic viewpoints shown on Figure 7.11 of the SR, in addition to the view from the keep of Pembroke Castle.</p>
ID.15	4.2.6 – 4.2.8 4.3 4.4	Historic Landscape	CADWs note that Annex A of their comments includes two registered landscapes, although the impact is not sufficient to require an Assessment of the Significance of the Impact of Development on Historic Landscape (ASIDOHL), but this impact should be considered in the stage 1 assessment.
<b>Landscape and Visual Effects</b>			
ID.16	5.3.1  5.3.8	Landscape and Visual Impact Assessment (LVIA)	<p>PCC are satisfied with the approach of the LVIA. The SR notes guidance that the LVIA will be prepared in accordance with, this is supported however, NRW advise that additional guidance that is not referred to in the SR should inform the preparation of the LVIA (see Appendix 1).</p> <p>It is proposed that the LVIA will assess the effects of the development at a number of stages from baseline, during construction, on competition (in the winter without the benefit of new mitigation planting), 15 years post completion (in the summer with the benefit of new mitigation planting) and 40 years post completion at decommissioning. In line with NRW's response in Appendix 1, an assessment should be made at year 15 during the winter when deciduous</p>

ID	Reference in Scoping Report	Issue	Comment
			mitigation planting may be less effective at screening the proposals, in addition to those listed in the SR.
ID.17	Figure 7.5	Study Area/ Zone of Theoretical Visibility (ZTV)	<p>The SR identifies a Zone of Theoretical Visibility (ZTV) for the LVIA. The extent of land covered by the ZTV, north and south of the site, is shown in Figure 5 of the SR as limited to within 2km of the site. In line with NRW's comments in Appendix 1, the ES should provide a robust reasoning for this, as the study area for an LVIA for a scheme of this size is usually expected to be 3-5 km.</p> <p>NRW also note that the ZTV was based on landform and therefore does not account for above ground features such as buildings and vegetation which will reduce the area of actual visibility compared with the results of the ZTV. The ZTV includes areas within the Pembrokeshire Coast National Park (PCNP), however it is not clear at this stage to what extent of the proposed development would be visible within the PCNP. The ES should provide clarity on this.</p>
ID.18	Figure 7.11	Viewpoints	<p>Figure 7.11 identifies locations of photographic viewpoints scoped in and scoped out based on a site visit, this includes three viewpoints within the PCNP, others located in the setting of the PCNP and two viewpoints within the PCNP that have been scoped out.</p> <p>NRW note that areas south of the site within the PCNP, e.g. around The Downs, are shown to have visibility on the ZTV, but no viewpoints have been considered within these areas. NRW assume that this is due to the impact of intervening vegetation on potential visibility of the proposed development, however, in line with NRW's advice PEDW will require that the ES provides justifications for any photographic viewpoints within the PCNP that have been scoped out.</p> <p>As advised by NRW, photomontages should be included in the ES to illustrate potential impacts on landscape and visual receptors, including at applicable</p>

ID	Reference in Scoping Report	Issue	Comment
			viewpoints within the PCNP. Photomontages and photography should be prepared and presented in accordance with the principles set out in TGN 06/19.
ID.19		Landscape Character Area (LCA) 25 Hundleton and Lamphey	NRW advise that the LVIA should consider the extent to which the development achieves or is in accordance with the guidelines for the LCA. In particular, the guideline to: <i>'Manage expansion of energy related developments such as solar, wind and power lines so that the capacity is largely open landscape is not exceeded'</i> .
ID.20	Section 8	Cumulative Effects	<p>The SR identifies the need to assess the potential cumulative effects of the proposed development with a nearby existing solar PV development on land east of Mylett's Hill, Golden Hill, 1.6 km north of the site.</p> <p>NRW note that there are other PV developments located within the LCA, including developments at Chapel Hill approximately 4 km southwest of the site and at Wogaston. It is noted that these developments are not likely to be viewed from the same location and are located at a distance from each other, however, there is the potential for sequential visual impacts and exacerbated existing impacts within the LCA. The LVIA should therefore report on the potential for these impacts to occur.</p>
ID.21		Design	The applicant's attention is drawn to NRW's comments in regard to the importance of design in landscape impact mitigation. The ES should explain the design evolution and how landscape and visual considerations have informed and shaped the proposals. Layout proposals should consider the design guidance - <i>Designing for Renewable Energy in Wales, Design Commission for Wales</i> .
<b>Agricultural Land and Soils</b>			
ID.22	6.2	Agricultural Land Classification (ALC) Survey / Baseline Information	In their response, the Soil, Peatland & Agricultural Land Use Planning Department at Welsh Government (LQAS) include a ALC report of the site prepared in June 2023. The report found the survey area to be 4.3 ha Grade 2, 32.3 ha Subgrade 3a, 42.00 ha Subgrade 3b and 5.8 ha 'non-agricultural land'.



ID	Reference in Scoping Report	Issue	Comment
			<p>The 10 ha unsurveyed area in the north of the proposed site is noted as mainly Grade 2, with some Subgrade 3b on the Predicative ALC map. LQAS note that as per Departmental Guidance, where the Predicative ALC map identifies grades 1,2 or 3a a survey will be required to determine Grades present and in what proportion.</p> <p>LQAS highlight that the proposed application may contain more than 40 ha of BMV agricultural land.</p> <p>The applicant's attention is drawn to LQAS's comments in Appendix 1, regarding how the location and extent of soils on site can inform decisions on infrastructure siting, decommissioning and restoration of the site.</p>
ID.23	6.3	Best and Most Versatile (BMV) agricultural land policy	<p>The applicant's attention is drawn to LQAS's comments in Appendix 1, where it is highlighted that due to the significant area of BMV land within the site, the department expects the ES to include clear evidence of how PPW par. 3.58 and 3.59 have been addressed.</p> <p>LQAS also include in their comments the additional policy context that should be considered.</p>
ID.24	6.3 2.4.4	Infrastructure and Potential Impacts on Soil Functions	<p>LQAS note in their response that additional information will be required for the ES assessment. The SR provides information on pile depth (section 2.4.4), however, further information will be required to determine the impact on soil functions, such as:</p> <ul style="list-style-type: none"> <li>• The type, location and level of infrastructure proposed</li> <li>• Total number and spacing of piles installed</li> <li>• The extent of cable trenching</li> <li>• Any imported fill materials used (e.g. cement bound sand)</li> <li>• Track extent type and location</li> </ul>

ID	Reference in Scoping Report	Issue	Comment
			<ul style="list-style-type: none"> <li>• Inverter pads number and locations</li> <li>• Areas for construction compounds.</li> </ul> <p>As advised by LQAS, the assessment will also need to provide detailed information on the methodology for the installation and decommissioning of the infrastructure and, considering the soils on site, how any likely impacts have been assessed and avoided.</p>
ID.25	6.3	Soil Management Scheme (SMS)	<p>Due to potential impact on mineral, organo-mineral and peat soils and their value as providing crucial ecosystem services such as climate regulation, biodiversity and protection from natural disasters, LQAS have advised that a soil management scheme should be prepared and included in the ES.</p> <p>The applicant's attention is drawn to LQAS's comments in Appendix 1 where the requirements for the SMS are set out. PEDW agrees with this approach and expects these requirements to be met in the ES.</p>
<b>Biodiversity</b>			
ID.26		Biodiversity	<p>The applicant's attention is drawn to the comments from the PCC Ecologist contained in Appendix 1, highlighting all the information required to be included within the ES regarding ecology. The PCC also provides a list of key points that should be addressed to provide confidence in the information provided in addition to key considerations for the ES.</p> <p>NRW state that the EIA must include a description of all the existing natural resources and wildlife interests within and in the vicinity of the proposed development, together with a detailed assessment of the likely impacts and significance of those impacts.</p>
ID.27	7.2.1 – 7.2.3	Protected Sites	<p>In their comments, NRW agree that the Pembrokeshire Marine Special Area of Conservation (SAC) will need to be considered within the EIA.</p>

ID	Reference in Scoping Report	Issue	Comment
	7.3.6		<p>NRW welcome the consideration of hydrology and pollution in the EIA outlined in par 7.3.6 of the SR, given the hydrological link to the Pembrokeshire Marine SAC.</p> <p>NRW also include a list of details to be included in the CEMP to prevent any run-off/pollution from construction entering the nearby watercourses.</p>
ID.28	7.2.4 – 7.2.6	Key Habitats and Protected Species Surveys	<p>NRW and PCC note the requirement for Phase 1 Habitat survey to be undertaken and completed in the summer to ensure the best chance of identifying the habitats present. NRW add that the survey should accord with the NCC Phase 1 survey guidelines. PCC add the need to include any identification of invasive species.</p> <p>As advised by NRW and PCC, the site and where necessary land adjacent to the site is subject to assessment to determine the likelihood of protected species being present and affected by the proposals. The ES must identify any habitats and species that are likely to be affected by the proposal and identify potential options for mitigation and enhancement. Targeted species surveys should be undertaken for all species scoped in which accord with NRW's requirements as contained in their comments in Appendix 1. There must be justification for disregarding certain species from any assessments.</p>
ID.29		Protected Species Impact Assessment	<p>The applicant's attention is drawn to the comments from NRW contained at Appendix 1 regarding how the ES should take account of any protected species identified on site and how long-term mitigation or compensation will be secured.</p> <p>The applicant's attention is also drawn to NRW's comments regarding European Protected Species License, the EIA must include consideration of the requirement for a license and set out how the works will satisfy the three</p>

ID	Reference in Scoping Report	Issue	Comment
			requirements as set out in the Conservation of Habitats and Species Regulations 2017 (as amended).
ID.30	7.2.7	Reptiles	<p>The SR notes that the site boundary features are likely to support reptile species, however these are expected to remain unaffected by the development. PCC's Ecologist includes in their comments in Appendix 1 that if suitable habitats are to be removed then surveys may be required and opportunities for reptile enhancements should be clearly identified and described.</p> <p>If suitable habitats are to be unaffected by proposals, Reptiles can be scoped out of the ES.</p>
ID.31	7.2.7	Badgers	The SR notes that no Badger setts have been identified on site to date, however, evidence of badger using the site have been identified in the desk study. The PCC Ecologist notes that any activity within 30 meters of a sett will require a license, therefore surveys may need to be undertaken to ensure there will be no disturbance of sets within or outside of the red line boundary.
ID.32		Birds	In their comments contained in Appendix 1, PCC's Ecologist notes that bird surveys are currently ongoing. PCC note that the application must make an assessment of the bird populations currently using the application area and the impact of the development on these birds, in terms of loss of habitat and displacement.
ID.33	7.2.7	Otter	In their comments contained at Appendix 1, NRW and PCC note that the SR considers that otters might be present within the wider area of the site. NRW add that their records confirm that the local landscape is being regularly used by otters and they are known to be breeding locally. They identify habitats within the redline boundary that suggest otters could be moving within the local landscape and within the red line boundary.

ID	Reference in Scoping Report	Issue	Comment
	2.4.6		<p>NRW have therefore advised that an understanding of otter usage (to include commuting, foraging, resting and breeding) within and across the site and within a 200 m buffer (or further, where there are ecologically relevant or significant features) must be gleaned through appropriate survey techniques and monitoring, to inform an assessment of the impacts of all stages of the proposal. This should include an assessment of impacts of installing deer type fencing up to 3 m high that is referred to in Section 2.4.6 of the scoping report.</p> <p>Due to records of otter road traffic collision deaths on the A4139 within 400 m of the north-eastern site boundary, NRW advise that an assessment of the potential impacts of increased traffic to and from the site on otters should be considered, and mitigation considered and included in the EIA. PEDW note that this would apply during construction and decommissioning.</p> <p>NRW highlight that retention and protection of all routes and features utilised by otters should be embedded in the mitigation proposals, PCC add that measures for ensuring that there is no disturbance to Otters caused by the proposal must be included in the ES.</p>
ID.34	7.2.6 7.2.7  7.2.5	Bats	<p>In their comments, NRW highlight that the local landscape is known to be of significance to greater horseshow and lesser horseshoe bats.</p> <p>The site is described within the SR as including field boundary habitats in the form of hedgerows and woodland that are likely to be used by a range of foraging/commuting bats as well as freshwater features and arable farmland with grazing pasture. NRW also note several outbuildings at the Alleston Farm in the centre of the proposed site.</p> <p>The statement in par. 7.2.5 of the SR where it is advised that all boundary features are expected to be retained and protected as part of the proposals is welcomed and supported by PEDW and NRW. However, NRW note that it is not</p>

ID	Reference in Scoping Report	Issue	Comment
			<p>clear whether any trees will be affected in terms of removal and management to facilitate the proposal. They also note conflicting statements within the SR regarding the amount and quality of bat foraging habitat in the grassland and grazing pasture. It is therefore advised by NRW that further bat surveys should be undertaken, and the information should be included within the EIA.</p> <p>The applicant’s attention is drawn to NRW’s comments in Appendix 1 regarding Trees and Buildings that may support roosting bats. Any trees that require felling, pruning or thinning must undergo the required assessments, and further assessments will be required where trees are categorised as having moderate to high potential for supporting bats. Any buildings within the application area that might be affected by construction or operational works should be assessed, with additional presence/absence and roost characterisation surveys undertaken as required.</p> <p>NRW require a detailed plan to be included with the EIA, outlining which trees require felling/pruning and which buildings are to be affected, with an indication of their potential to support roosting bats. Should any bat roosts be confirmed in any tree or built structure, NRW advise that an assessment of the impacts of the scheme on these roost sites, and proposals to mitigate or compensate for them is included in the EIA.</p> <p>PCC agree that consideration will need to be made of any impact for foraging and commuting bats. PCC highlight that security lighting may impact upon bat movements in the area, if significant lighting is proposed the applicants attention is drawn to the comments contained within Appendix 1 as important areas for bats must remain dark and lighting plans should be prepared to demonstrate that there will be no impact on bats.</p>

ID	Reference in Scoping Report	Issue	Comment
			The required surveys will be carried out in accordance with best practice guidelines. It is expected that important features for bats would be retained and their function for bats protected.
ID.35	7.2.7	Dormouse	<p>The SR notes that hedgerows and adjacent mature woodland are suitable for dormouse, and that their presence cannot be ruled out.</p> <p>NRW and PCC agree with this statement and welcome that boundary features, including hedgerows and woodland are to be retained. NRW and PCC comment that providing this is the case and no habitat which could be used by dormice is to be impacted by the scheme and therefore this species can be scoped out of the ES.</p> <p>NRW and PCC both advise that if revised information or proposals find that any aspect of the proposal could have an impact on dormice, then the species should be scoped into the EIA, including information regarding the amount of hedgerow to be removed and/or further justification for not undertaking dormice surveys.</p> <p>If dormouse are found to be affected by the proposal, NRW will require a Dormouse Conservation Plan to be included with the ES, setting out the anticipated impacts and mitigation/compensation. It is expected that important features for dormice would be retained and their function for dormice protected.</p>
ID.36	7.2.7	Great Crested Newt (GCN)	The SR includes that the site is outside the area for GCN, indicating the likely absence of the species from on-site and nearby waterbodies. NRW include in their comments that they have nothing to add to this, GCN can therefore be scoped out of the ES.

ID	Reference in Scoping Report	Issue	Comment
ID.37		Water Vole	The SR notes that Water Vole records are sparse in the area, although the watercourse adjacent to south of the site may support these species. NRW advise that if any aspect of the proposal is to include works within 6 meters of any freshwater features that the site walkover surveys should include an assessment for water vole on these features; where relevant, appropriate mitigation should be designed into the EIA to protect this species and their habitat.



## 8. Other Matters

**This section does not constitute part of the Scoping Direction, but addresses other issues related to the proposal.**

### 8.1 Changes to PPW

On 11 October 2023 the Welsh Government introduced changes to Chapter 6 of PPW relating to:

- Green Infrastructure,
- Net Benefit for Biodiversity and the Step-wise Approach,
- Protection for Sites of Special Scientific Interest, and
- Trees and Woodlands.

Details are available in the relevant 'Dear Chief Planning Officer' letter:

<https://www.gov.wales/addressing-nature-emergency-through-planning-system-update-chapter-6-planning-policy-wales>

These changes have now been consolidated into a new edition of PPW (ed. 12), published on 07 February 2024: <https://www.gov.wales/planning-policy-wales>

### 8.2 Updated Guidance from the Design Commission for Wales

On 23 November 2023 the Design Commission for Wales published their updated guidance "Designing for Renewable Energy in Wales". The guidance is available online:

<https://dcfw.org/designing-for-renewable-energy-in-wales/>

### 8.3 Habitats Regulation Assessment

[The Conservation of Habitats and Species Regulations 2017](#) require competent authorities, before granting consent for a plan or project, to carry out an appropriate assessment (AA) in circumstances where the plan or project is likely to have a significant effect on a European site (either alone or in combination with other plans or projects). The competent authority in respect of a DNS application is the relevant Welsh Minister who makes the final decision. It is the Applicant's responsibility to provide sufficient information to the competent authority to enable them to carry out an AA or determine whether an AA is required.

When considering whether or not significant effects are likely, applicants should ensure that their rationale is consistent with the [CJEU finding](#) that mitigation measures (referred to in the judgment as measures which are intended to avoid or reduce effects) should be assessed within the framework of an AA and that it is not permissible to take account of measures intended to avoid or reduce the harmful effects of the plan or project on a European site when determining whether an AA is required ('screening'). The screening stage must be undertaken on a precautionary basis without regard to any proposed integrated or additional avoidance or reduction measures. Where the likelihood of significant effects cannot be excluded, on the basis of objective information the competent authority must proceed to carry out an AA to establish whether the plan or project will affect the integrity of the European site, which can include at that stage consideration of the effectiveness of the proposed avoidance or reduction measures.

Where it is effective to cross refer to sections of the ES in the HRA, a clear and consistent approach should be adopted.

The Planning Inspectorate's guidance for Nationally Significant Infrastructure Projects – [Advice Note 10: Habitat Regulations Assessment relevant to Nationally Significant Infrastructure Projects](#) may prove useful when considering what information to provide to allow the Welsh Ministers to undertake AA.

#### 8.4 SuDS Consent

Whilst a separate legislative requirement from planning permission, the Applicant's attention is drawn to the statutory SuDS regime that came into force in Wales in January 2019. The requirement to obtain SuDS consent prior to construction may require iterative design changes that influence the scheme that is to be assessed within the ES and taken through to application. As such, it is recommended that the applicant contact the local SuDS Approval Body early on.

# Appendix 1: Consultation Responses

Date · Dyddiad 11<sup>th</sup> January 2024  
Your ref · Eich cyfeimod DNS CAS-03072-D7X6N7  
My ref · Fy nghyfeimod CO/0372/23  
Telephone · Ffôn 01437 764551  
Email · Ebost [Planning.support.team@pembrokeshire.gov.uk](mailto:Planning.support.team@pembrokeshire.gov.uk)  
[www.pembrokeshire.gov.uk](http://www.pembrokeshire.gov.uk) / [www.sir-benfro.gov.uk](http://www.sir-benfro.gov.uk)



Pembrokeshire County Council  
Cyngor Sir Penfro

WILL BRAMBLE CBE.  
*Chief Executive / Prif Weithredwr*

RICHARD BROWN  
*Assistant Chief Executive  
Cynorthwyol Brif Weithredwr*

Pembrokeshire County Council,  
County Hall, HAVERFORDWEST,  
Pembrokeshire, SA61 1TP

Cyngor Sir Penfro,  
Neuadd y Sir, HWLFFORDD,  
Sir Benfro, SA61 1TP

Telephone / Ffôn 01437 764551

Please ask for  
Os gwelwch yn dda gofynnwch am

Sian Husband

[PEDW.Infrastructure@gov.wales](mailto:PEDW.Infrastructure@gov.wales)

By e-mail only

Dear Sir/Madam

Proposal: **Ground mounted photovoltaic solar farm with a capacity of up to 49MW together with associated equipment, infrastructure and ancillary works**

Location: **Alleston Farm, Pembrokeshire**

Planning and Environment Decisions Wales (PEDW) consulted Pembrokeshire County Council local planning authority (the LPA) on 16<sup>th</sup> November 2023 requesting the LPA's advice on the scope of the proposed EA in respect of the above proposed development. An extension of time for responding until 12<sup>th</sup> January 2024 was agreed by PEDW on 14<sup>th</sup> December 2023. The LPA have considered the 'Alleston Solar Farm, Pembrokeshire – Environmental Impact Scoping Report' dated November 2023, Project Ref: 32516, Rev: 02.

It is noted that the adjacent planning authority, Pembrokeshire Coast National Park Authority, were also consulted and due to respond under separate cover.

### **Chapter 2 – The site and Proposed Development**

No comment

### **Chapter 3 – Scoping**

It is noted that transport is proposed to be scoped out. Please refer to Appendix 1.

It is noted that flooding is proposed to be scoped out. Please refer to Appendix 2.

## **Chapter 4 – Historic Environment**

It is understood that Dyfed Archaeological Trust (DAT) find the approach outlined in the Scoping Report to address potential impacts of the development on the historic environment, with a desk-based assessment to form part of the forthcoming ES to be acceptable. The scope of this assessment is the subject of ongoing discussions with Stantec UK Limited and initial comments have been made by DAT on a draft WSI.

The Heritage Note found in the appendix to the scoping report is considered to fail in its recognition of the Grade II curtilage listed status of the historic outbuildings. Therefore, the assessment of visual impact is skewed towards the house, only, rather than the surviving model farm buildings as a group. It is recommended that the heritage note and assessment is revisited. Further regard must be given to the significance of the historic outbuildings and their setting as a group.

It is noted that there is recognition of the significance of the house's setting when viewed over the fields from the entrance on Lower Lamphey Road to the North.

## **Chapter 5 – Landscape and Visual Effects**

The Landscape and Visual Impact Assessment approach is considered to be adequately described and should cover the assessment approach adequately. It is noted that the issue of protected trees (those with TPOs) has not been addressed but it is understood that relevant information has since been obtained from The LPA Landscape Officer and will be included.

It is suggested that information is provided in as concise a manner as possible, with information presented in tabulated form as much as possible to reduce size and improve readability.

## **Chapter 6 – Agricultural Land and Soils**

No comment. The LPA defers to the Agricultural Directorate at Welsh Government who have also been consulted.

## **Chapter 7 – Biodiversity**

Please refer to Appendix 3.

## **Chapter 8 – Cumulative Effects and Consultation**

No comment

I trust that this consultation response is beneficial, but please contact me should you have any queries.

Yours sincerely,

*S Husband*

## **DEVELOPMENT MANAGEMENT SECTION**

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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.

## **Appendix 1**

Response received from Pembrokeshire County Council Head of Infrastructure, Highways;

### **Site Location**

The proposed layout of the solar farm will be on land within the control of the applicant, located between Pembroke and Lamphey, with primary access obtained from the north via the C3164 known as Lower Lamphey Road, a well trafficked lane by vehicles, cycles and pedestrians, a secondary access to the site is located to the west via Watery Lane a narrow unclassified highway.

### **Access & Traffic**

The site for the solar field is located within the boundary of the site with the precise locations yet to be decided. The proposed development should utilise the main access to the site as Watery Lane (the secondary access to the site) is not acceptable for multiple HGV movements due to the width, surface and topography of the Highway. Lower Lamphey Road at this location is a single track lane, which relatively well trafficked, with limited passing opportunities. The proposal will use around 1km of this lane from Lamphey, to access the existing farm access, assuming access is gained from the east.

The EIA Scoping report illustrates that the development is unlikely to exceed 32 HGV movements per day during construction/ decommissioning phase (approximately 8-9 months), with maintenance visits of around 26 per year (para; 3.2.3, pg. 7). With the delivery vehicles likely to arrive in within a short timeframe of each other, it would be necessary to provide additional passing bays along the county highway to improve passing opportunities and pedestrian refuge opportunities.

A Construction Environmental Management Plan (CEMP) and a Decommissioning Environmental Management Plan (DEMP) will be submitted with any forthcoming planning application, this will consider noise and air quality impacts, with mitigation measures to address the environmental impacts of the traffic associated with the construction/ decommissioning of the proposal.

To ensure the minimising potential traffic and infrastructure impacts the applicant/developer will be required to submit a Construction Traffic Management Plan (CTMP) to the Local Planning Authority within any future planning application, with details of the access arrangement to ensure it accommodates HGV traffic into/out of the site with good visibility. In addition, it should also include the following:

- a. Parking for vehicles, site personnel, operatives and visitors
- b. Expected levels of staff and any shift work, by phase
- c. Expected trip generation for the construction period
- d. Loading and unloading of plant and materials
- e. Storage of plant and materials
- f. Vehicle routing and turning, including swept paths
- g. Measures to prevent the deposit of materials on the highway
- h. Before and after construction conditions surveys of the highway and a commitment to fund the repair of any damage caused

#### i. On-site turning for construction vehicles

It is considered that the existing standard/capacity of the lane is not suitable or sufficient and as such the recommendation from the CHA is that lane is upgraded in both capacity and, if required following pre construction survey, structural terms.

The EIA Scoping report indicates that a glint and glare assessment (Para 3.2.9, pg. 9) will be undertaken and submitted to support any forthcoming planning application.

#### **Accidents**

A review of CrashMap has indicated one slight accident in November 2022 within a 400m of the access located on the A4139 (Upper Lamphey Road). The Applicant is requested to provide a STATS19 accident review in any forthcoming planning application, and any proposed mitigation measures which may be required to prevent future accidents in this area due to the increase in HGV vehicles.

#### **Sustainable Transport**

Given the nature of the proposed development, there is no requirement to pursue any sustainable travel measures.

##### Other Matters

The Applicant is advised that within any future planning application the following information should also be included:

- Appropriate National, Regional and Local Policies
- Consultation with the PCC SAB team in order to assess flood risks
- Consultation with PCC Environment team for associated biodiversity risks
- Consultation with any Statutory Utilities will be required
- Consultation with PCC Ecology team for any associated wildlife surveys

This information in this assessment has been provided based upon the evidence available to support the consultation. Any future planning application used to support the proposed development at this location, of a similar size and scale, will be made without prejudice and based upon its own merit.



## **Appendix 2**

Response received from Pembrokeshire County Council Head of Infrastructure, Civils;

### **Flood Risk**

Whilst we are aware of incidents of historic flooding affecting Lower Lamphey Road, Watery Lane, and Alleston, we have no records of any flooding incidents to agricultural land within the site to which the coping request refers to. However, it cannot be assumed that this site has never suffered from flooding; only that the events have never been reported to the LLFA.

The EIA scoping reports states that a detailed flood consequence assessment will be submitted as part of the application process.

It is understood that reference has been made to Natural Resources Wales Flood Map for planning who should also be consulted in relation to flood risk for the proposals.

### **Ordinary Watercourses**

Ordnance Survey mapping show ordinary watercourses to be present within or in close proximity of the proposed site.

Ordinary watercourses must not be filled in, culverted, or the flow impeded in any manner, or 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 the local planning authority 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.

Local or field boundary ditches, not shown on Ordnance Survey mapping, may exist around or across the site. If present, these should be maintained and highlighted on future plans.

### **Surface Water Drainage**

The preferred method of surface water disposal from all additional impermeable areas created by the development would be to utilise some form of sustainable drainage system. These methods of surface water disposal would be in accordance with TAN 15. If, however, ground conditions are not suitable for the use of soakaways/infiltration type SuDS, an alternative method of disposal will be required.

A surface water drainage strategy should form part of any planning application.

## **Statutory SuDS Standards**

Schedule 3 to the Flood and Water Management Act 2010 (the 2010 Act) establishes SABs in local authorities. The legislation gives those bodies statutory responsibility for approving and in specified circumstances, adopting the approved drainage systems.

From 7th January 2019, all new developments of more than 1 property or where the construction area is 100 square meters or more, will require sustainable drainage systems (SuDS) for surface water. The SuDS must be designed and built in accordance with Statutory SuDS Standards<sup>1</sup> published by the Welsh Ministers and SuDS Schemes must be approved by the local authority acting in its SuDS Approving Body (SAB) role, before construction work begins.

### **Appendix 3**

Response received from Pembrokeshire County Council Planning Ecologist;

Any application/ES must provide sufficient information to identify any nature conservation features (habitats/species) that are likely to be affected by the proposals and identify potential options for mitigation and enhancement. The impacts of any species protected under legislation must be considered along with any species or habitats listed under the Pembrokeshire LBAP, UK BAP and the Section 7 list of the Environment (Wales) Act 2016. Surveys must be carried out by a qualified ecological surveyor and the ES must identify the potential of the habitats on site to be used by protected species

#### **Any application/Environmental Statement (ES) must:**

- Cover the construction, operation maintenance, closure and decommissioning stages of any project.
- Determine the importance of ecological features affected, through survey and/or research.
- Assess impacts potentially affecting important features.
- Characterise the impacts by describing their extent, magnitude, duration, reversibility, timing and frequency.
- Identify cumulative impacts; and identify significant effects of impacts in the absence of any mitigation.
- Consider alternative location(s) or layouts for the proposed development.
- Identify mitigation measures and explain their likely success.
- Identify opportunities for enhancement.
- Design and agree a monitoring strategy and monitoring of mitigation performance.
- Provide sufficient information for mitigation measures to be implemented effectively.
- Produce a clear summary of the residual impacts and the significance of their effects following incorporation of avoidance and mitigation measures, in accordance with planning policies and legislation.

In order to provide confidence in the information provided as part of the application/ES the following key points must be addressed:

- Ecological baseline and trends if the project were not to go ahead.
- Criteria used to evaluate ecological features.
- Criteria used to assess the significance of impacts of the project.
- Justification of methods used.
- The identification of likely impacts (positive and negative) on ecological features together with an explanation of the significance of their effects.
- Mitigation, compensation and enhancement measures.
- Legal and policy consequences.
- A note of any key data that were unavailable or missing and
- A presentation of any analytical techniques used and the analysis itself.

- Consideration for the zone of influence – if the site requires new infrastructure (roads, power supply etc.) there could be significant consequences for ecological features beyond the boundaries of the site

**Any ES must also be mindful of the following:**

- Preliminary activities prior to the main construction contract
  - Ground investigations.
  - Vegetation clearance.
- Construction phase
  - Access and travel on/off-site, including temporary access routes for vehicles.
  - Areas for plant maintenance and for storage of oils, fuels and chemicals.
  - Movement of materials to/from or within the site.
  - Acoustic disturbance and vibration from construction activities.
  - Dust generation.
  - Soil stripping.
  - Environmental incidents and accidents e.g. spillages, noise and emissions.
  - Lighting
  - Vegetation/habitat clearance including tree felling.
- Occupation/operational and decommissioning phase
  - Access to site (both route and means).
  - Drainage.
  - Implementation of habitat management.
  - Lighting.

**Species and Habitats to be considered**

A primary ecological assessment has not been submitted in support of the current consultation and scoping opinion but will be undertaken on the site to inform biodiversity assessment baseline conditions. It should include the following information.

- Any application/ES must identify any habitats and species that are likely to be affected by the proposal and identify potential options for mitigation and enhancement. There must also be justification for disregarding certain species from any assessments.
- A **Phase I habitat survey** must identify the quality and extent of the habitats present. The habitat survey must be carried out between the months of April and September only. It should also identify the presence of any invasive species.
- **Reptiles** – common species of reptiles may be present on a site of this nature. If suitable habitat is to be removed as a result of the proposal then survey may be required. A precautionary approach to any site clearance may also be necessary. It is likely that the development will result in opportunities for reptile enhancements, these should be clearly identified and described.

- **Badgers** – Sightings of badgers have been recorded on site as stated in the report, although no setts have been identified within the red lie boundary. Biodiversity records also show tracks and evidence of badgers within two locations of the site. It is important to be mindful that activity within 30 metres of a sett will require a license. Therefore surveys may need to be undertaken to ensure there will be no disturbance of setts outside the red line boundary. Badgers are protected under The Protection of Badgers Act 1992.
- **Birds** – The application must make an assessment of the bird populations currently using the application area in the form of a breeding bird survey and the impact of the development on these birds, in terms of loss of habitat and displacement. The report highlights that between two and four wintering bird surveys are proposed for winter 2023 – 23 and two breeding bird surveys will be undertaken in spring 2024.
- **Dormice** – The submitted report identifies that there are suitable hedgerows on site to support dormice, however does not consider dormice further as there are no records within close proximity and no anticipated impact to habitat. The closest known record is approximately 3.5 km away; however, it is still possible that dormice are present in the area. Provided the hedgerows are retained throughout and there are no hedgerows to be removed, dormouse surveys will not be necessary. However, in the event that hedgerows will be removed the exact amount of hedgerow to be removed and further justification for not undertaking dormice surveys will be required within any submitted application/ES. Dormice are protected under European and UK legislation, their presence is a material consideration in the planning process.
- **Bats** – There are several important sites for bats within relatively close proximity to the proposed development. Consideration will need to be made of any impacts for foraging and commuting bats. Bat activity surveys (static detectors only) have been undertaken and further activity surveys are ongoing. The field habits and woodland are likely to be used by foraging and community bats. Any security lighting may impact upon bat movements in the area, therefore if significant lighting is proposed, the activity surveys should be used to establish important areas for bats which must remain dark and inform any lighting plan to ensure there is no impact upon the bats and other nocturnal wildlife. Bats are protected under European and UK legislation, their presence is a material consideration in the planning process.
- **Otter** – As stated in the report the watercourse to the south of the site may support otter and water vole. If there is suitable otter habitat on the site then surveys may be required, if suitable otter habitat is found immediately adjacent, then measures for ensuring there is no disturbance must be included within any application/ES. Otters are protected under European and UK legislation, their presence is a material consideration in the planning process.

## **Biodiversity Enhancements:**

Solar Parks offer numerous opportunities to provide enhancements for wildlife, particularly where they are developed on land which has previously held low ecological diversity, such as improved and arable land. An **ecological management plan** should be submitted, to include details of how the site will be managed for wildlife throughout the solar farms lifetime.

The plan should also include details of an **ecological monitoring programme**, to ensure the management plan is working and, where necessary, make changes to ensure appropriate and successful management for biodiversity.

### **Please also be mindful of the following points:**

- The results of all required surveys and assessments of the effects the development may have on species and habitats and recommendations for mitigation and enhancement must be included within any application/ES.
- Ecological assessments may result in the requirement for further survey work.
- Surveys and assessments must be carried out in line with the British Standards for Biodiversity: Code of Practice for Planning and Development (BS42020:2013) and other relevant species and survey best practice guidelines. All surveys will be required to be carried out by a suitably qualified ecologist within the appropriate season and to appropriate survey standards and methodology.

Ein cyf/Our ref: CAS-242898-W0H2  
Eich cyf/Your ref: CAS-03072-D7X6N7

Planning and Environment Decisions Wales,  
Adeilad y Goron,  
Parc Cathays,  
Caerdydd,  
CF10 3NQ.

Dyddiad/Date: 20 December 2023

Annwyl Syr/Madam/Dear Sir/Madam,

**TOWN AND COUNTRY PLANNING ACT 1990 THE DEVELOPMENTS OF NATIONAL SIGNIFICANCE (PROCEDURE) (WALES) ORDER 2016**

**TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT (WALES) REGULATIONS 2017**

**BWRIAD/PROPOSAL: Ground mounted photovoltaic solar farm with a capacity of up to 49 MW together with associated equipment, infrastructure and ancillary works.**

**LLEOLIAD/LOCATION: Alleston Farm, Pembrokeshire.**

Thank you for consulting us on the scoping opinion request for the above application which we received on the 16 November 2023.

We are commenting because we consider that the proposals are likely to give rise to significant effects.

We advise that the likely significant effects are assessed by the applicant, and we consider that they should be 'scoped in' to any future Environmental Statement (ES).

**European protected species**

We have reviewed the following document:

- "Alleston Solar Farm, Pembrokeshire - Environmental Impact Assessment (EIA) Scoping Report" Version 2 by Stantec, dated November 2023

An evaluation of the impacts of the scheme should include direct and indirect; cumulative; short, medium and long term; permanent and temporary; positive and negative; construction, operation and decommissioning phases, and impacts on long-term site security of the nature conservation resource.

## Description of Biodiversity

The EIA must include a description of all the existing natural resources and wildlife interests within and in the vicinity of the proposed development, together with a detailed assessment of the likely impacts and significance of those impacts.

## Key Habitats

Any habitat surveys should accord with the NCC Phase 1 survey guidelines (NCC (1990) Handbook for Phase 1 habitat survey. NCC, Peterborough). We advise that Phase 1 surveys are undertaken and completed during the summer to ensure the best chance of identifying the habitats present.

## Protected Species Surveys

We advise that the site and where necessary land adjacent to the site is subject to assessment to determine the likelihood of protected species being present and affected by the proposals. Targeted species surveys should be undertaken for all species scoped in which:

- i. are undertaken by qualified, experienced and where necessary, licensed ecologist(s) and,
- ii. comply with current best practice guidelines. In the event that the surveys deviate from published guidance, or there are good reasons for deviation, full justification for this should be included within the EIA.

## **Otter**

We note that Section 7.2.7 of the scoping report considers that otters might be present within the wider area, and that the watercourse adjacent to the south of the site might support this species.

We note the local landscape is being used regularly by otters, with records suggesting use of overland routes as well as watercourses. Otters are also known to be breeding within the local landscape.

There are several ditches, watercourses and wooded riparian corridors within the red line boundary, and a pond that sits within the Ancient Semi Natural Woodland that was identified within the report. A further pond and woodland area are situated adjacent to the red line boundary at the south-western border.

It can be considered that otters could be moving regularly within and between catchments within the local landscape surrounding and within the red line boundary, via a combination of routes that could include watercourses and over-land routes. Given the proximity of Bosherton Lakes (that form part of Pembrokeshire Bat Sites and Bosherton Lakes SAC) and Pembroke Mill Ponds LNR, NRW advises that an understanding of otter usage (to include commuting, foraging, resting and breeding) within and across the site, and within a 200m buffer (or further, where there are ecologically relevant or significant features) must be gleaned through appropriate survey techniques and monitoring, to inform an assessment of the impacts of all stages of the proposal. This should include an assessment of impacts of installing deer type fencing up to 3m high that is referred to in Section 2.4.6 of the scoping report.

We are aware of records of at least two otter road traffic collision deaths on the A4139 within 400m of the north-eastern site boundary. We therefore further advise that an assessment of the potential impacts of increased traffic to and from the site on otters



should be considered, and mitigation considered and included in the EIA where appropriate.

Retention and protection of all routes and features utilised by otters should be embedded in the mitigation proposals.

## **Bats**

The local landscape is known to be of significance to greater horseshoe and lesser horseshoe bats.

We welcome information in the scoping report that bat surveys using static detectors have been carried out (Section 7.2.6); however, no details about either these surveys or further proposed surveys are included.

In addition to the freshwater features and woodland mentioned above, the site is described as comprising mostly arable farmland with some grazing pasture, and that robust native hedgerows border the field margins. Several outbuildings at the Alleston Farm in the centre of the proposed site have also been identified.

Section 7.2.5 of the report advises that it is expected that all boundary features (which NRW takes to be woodland and hedgerows) are expected to be retained and protected as part of the proposals, and we welcome this proposal. It is not clear, however, whether any trees will be affected in terms of removal or management to facilitate this proposal. There also appears to be conflicting statements about the amount and quality of bat foraging habitat in the grassland and grazing pasture that will change over the course of the development.

We therefore advise that further bat surveys should be undertaken prior to submission of the proposed application, and that the following information should be included in the EIA:

### Trees

Should any trees require felling, pruning or thinning, a preliminary ground level roost assessment must be undertaken to assess their potential to support roosting bats. For any trees categorised as having moderate to high potential for supporting bats, further surveys (climbing inspections and/or activity surveys) will be required in accordance with best practice guidelines.

### Buildings

Any farm buildings within the application area that might be affected by construction or operational works, whether directly or indirectly, should also be assessed for the potential to support bats, with additional presence/absence and roost characterisation surveys undertaken as required, in line with best practice guidelines.

A detailed plan should be included in the supporting information for the EIA that outlines which trees require felling/pruning and which buildings are to be affected, together with an indication of their potential to support roosting bats.

Should bat roosts be confirmed in any tree or built structure, we advise that an assessment of the impacts of the scheme on these roost sites, and proposals to mitigate or compensate for them, is included in the EIA. Where possible, it would be expected that important features for bats would be retained and their function for bats protected.

## Site usage

Surveys to establish bat usage of the whole site should be submitted, rather than being limited to static detector monitoring, to enable a comprehensive understanding of how all habitats across the site, including grazing pasture, are used by bats.

## **Dormouse**

We note from the scoping report (7.2.7) that the hedgerows and adjacent mature woodland are suitable for dormouse, and that their presence cannot be ruled out. NRW is aware that this species is likely to be under-recorded in the area and agrees with this statement.

We welcome the statement in the report that the boundary features, including hedgerows and woodland, are to be retained and that the that dormice will therefore be unaffected. Providing this is the case and no habitat which could be used by dormice is to be impacted by the scheme, we have no further comments on this species.

If, however, revised information finds that there is potential for any aspect of the proposal to have an impact on dormice, then we advise that dormice should be scoped into the EIA and a Dormouse Conservation Plan included within the EIA, setting out the anticipated impacts and all the mitigation and/or compensation measures that will be put in place to offset these. It would be expected that important features for dormice would be retained and their function for dormice protected.

## **Great Crested Newt**

We note the statement in the report that the site lies outside of the known range for great crested newt, indicating the likely absence of this species from on-site and nearby waterbodies.

We have no further comments on this species.

## **Nationally Protected Species**

Water vole

Whilst we agree that water vole records are sparse in the area, we note the statement in Section 7.2.7 that the watercourse adjacent to the site has potential to support this species.

If any aspect of the proposal is to include works within 6 metres of any freshwater features, we advise that site walkover surveys should include an assessment for water vole on these features; where relevant, appropriate mitigation should be designed into the EIA to protect this species and their habitat.

## Impact Assessment

Should protected species be confirmed, information must be provided identifying the species-specific impacts in the short, medium and long term together with any mitigation and compensation measures proposed to offset the impacts identified.

We advise comprehensive descriptions of the habitats affected are included to support robust conclusions about their significance for the species.

We advise that EIA considers significance (both alone and in combination) and where applicable conservation status. In respect of conservation status, we advise that consideration be given to the current conservation status of the relevant species. The EIA

must demonstrate that there will be no detriment to maintenance of favourable conservation status (FCS) of the species during construction, operation and, where relevant, decommissioning phases of the scheme.

Where proposals implicate protected species which are also notified features of designated sites (e.g. SAC, SSSI), we advise that the EIA considers the impacts on those species from both perspectives. We also advise that the relevant Environment Team are consulted on the proposals.

We advise that the EIA sets out how the long-term site security of any mitigation or compensation will be assured, including management and monitoring information and long term financial and management responsibility. Where the potential for significant impacts on protected species is identified, we advocate that a Conservation Plan is prepared for the relevant species and included as an Annex to the EA.

### EPS Licence

Where a European Protected Species is identified and the development proposal will contravene the legal protection they are afforded, a licence should be sought from NRW. The EIA must include consideration of the requirements for a licence and set out how the works will satisfy the three requirements as set out in the Conservation of Habitats and Species Regulations 2017 (as amended).

Where a European Protected Species is present and a development proposal is likely to contravene the legal protection, they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three requirements set out in the legislation. A licence may only be authorised if:

- (a) It satisfies an appropriate derogation or licencing purposes, which in the case of development is most likely to be preserving public health or safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment;
- (b) There is no satisfactory alternative and
- (c) The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

These requirements are also translated into planning policy through Planning Policy Wales (PPW) February 2021, section 6.4.22 and 6.4.23 and Technical Advice Note (TAN) 5, Nature Conservation and Planning (September 2009). The local planning authority will take them into account when considering the EIA where a European Protected Species is present.

### Local Biodiversity Interests

We recommend that the developer consults the local authority Ecologist on the scope of the work to ensure that regional and local biodiversity issues are adequately considered, particularly those habitats and species listed in the relevant Local Biodiversity Action Plan, and that are considered important for the conservation of biological diversity in Wales.

NRW would expect the developer to contact other relevant people/organisations for biological information/records relevant to the site and its surrounds. These include the relevant Local Records Centre and any local ecological interest groups (Eg. bat groups, mammal groups).

Finally, we advise that the development incorporates robust green infrastructure that will remain unlit to allow protected species to continue to inhabit the site and move through it. It is vital that the design of the development avoids narrow green infrastructure corridors through it, and avoids breaks in those corridors.

### Securing Biodiversity Enhancement

We also advise that, in accordance with the Environment (Wales) Act 2016 and Planning Policy Wales, the application demonstrates how it can deliver biodiversity enhancements and thus contribute to promoting ecological resilience. This is reaffirmed in the Welsh Government letter of 23/10/19 to all Chief Planning Officers.

### **Landscape**

Our landscape planning advice relates to the landscape character and visual amenity of the Pembrokeshire Coast National Park (PCNP) and its setting, and the statutory purpose of the designation to conserve and enhance its natural beauty.

Our advice is based on the *Alleston Solar Farm, Pembrokeshire Environmental Impact Assessment Scoping Report, November 2023* prepared by Stantec (Scoping Report). In particular:

- Section 5: Landscape and Visual Effects
- Section 8: Cumulative Effects and Consultation
- Figures 1.1 – 7.11

To accord with Policy 18 of Future Wales: The National Plan 2040 (FW), the proposals should not have an unacceptable adverse impact on the surrounding landscape, particularly on the setting of the PCNP.

### **Section 5: Landscape and Visual Effects**

A landscape and visual impact assessment (LVIA) will be prepared and will include an assessment of the potential effects on the PCNP and landscape character areas within the PCNP (Table 5.1).

The Scoping Report cites relevant guidance for the preparation of the LVIA. We advise that other relevant guidance not referred to in the Scoping Report and which should inform the preparation of the LVIA, is:

- NRW Guidance Note 46 Using LANDMAP in Landscape and Visual Impact Assessments.
- Technical Guidance Note (TGN) 02/21 Assessing Landscape Value Outside National Designations, Landscape Institute.
- TGN 06/19 Visual Representation of development proposals, Landscape Institute.

Paragraph 5.3.8 of the Scoping Report states the LVIA will assess the effects at the following times:

- Baseline year 2023.
- During construction.

- On completion – in the winter without the benefit of new mitigation planting.
- 15 years post completion – in the summer with the benefit of new mitigation planting.
- 40 years post completion at decommissioning.

We advise that to understand the year-round effectiveness of the mitigation planting, the assessment at year 15 should also consider the effects during winter when deciduous mitigation planting may be less effective at screening the proposals.

The LVIA will assess the effects on landscape character within Landscape Character Area (LCA) 25 Hundleton and Lamphey, in which the site is located. As well as assessing the effects on the characteristics of this landscape, we advise the assessment should also consider the extent to which the development achieves or is in accordance with the guidelines for the LCA. In particular, the guideline to: *‘Manage expansion of energy related developments such as solar, wind and power lines so that the capacity of this largely open landscape is not exceeded’*.<sup>1</sup>

The Scoping Report does not provide a proposed study area for the LVIA, but a Zone of Theoretical Visibility (ZTV) analysis has been prepared which includes a map extent of 7km x 5.5km (Figure 7.4: ZTV). The extent of land north and south of the site covered by the ZTV is limited to within 2km of the site. Typically, for a scheme of this size a 3-5km study area may be used as a starting point for the LVIA study area. The LVIA should confirm and explain the reasoning for the selection of the final LVIA study area.

The ZTV indicates visibility across much of the map extent shown on Figure 7.4, including areas within the PCNP. The ZTV was based on landform and therefore does not account for above ground features such as buildings and vegetation which will reduce the area of actual visibility compared with the results of the ZTV. At this stage, it is not clear to what extent the proposed development would be visible from within the PCNP.

The location of ‘potential representative viewpoints’ is shown on Figure 7.11. Three viewpoints are within the PCNP, and others are located in the setting of the PCNP. Two viewpoints within the PCNP were ‘scoped out’ following a site visit. We note areas south of the site within the PCNP, e.g., around The Downs, are shown to have visibility on the ZTV, but no viewpoints have been considered within these areas. We assume this is due to the impact of intervening vegetation on potential visibility of the proposed development from within these areas, but the LVIA should confirm this.

The Scoping Report does not state whether photomontages will be prepared. We advise photomontages should be prepared to illustrate potential impacts on landscape and visual receptors, including at applicable viewpoints within the PCNP. We advise photomontages and photography should be prepared and presented in accordance with the principles set out in TGN 06/19.

## **Section 8: Cumulative Effects**

The Scoping Report proposes to assess the potential cumulative effects of the proposed development in combination with:

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<sup>1</sup> Pembrokeshire County Landscape Character Assessment, 2022, LCA 25: Hundleton and Lamphey

- An existing solar PV development on land east of Mylett's Hill, Golden Hill, 1.6km north of the site.

Three other solar PV developments are located within LCA 25 Hundleton and Lamphey. These include developments at Chapel Hill c.4km southwest of the site and at Wogaston. Although these developments are unlikely to be visible from the same location and are located at a distance from each other, there may be sequential visual impacts within LCA 25, and existing impacts on characteristics of LCA 25 may be exacerbated. The LVIA should report on the potential for such impacts to occur.

## **Design**

Design guidance prepared to support FW Policies 17 and 18 is set out in *Designing for Renewable Energy in Wales, Design Commission for Wales, November 2023*. This recognises the importance of landscape informing the design of large-scale renewables, and states '*Landscape should be the leading consideration in this process and not merely follow on in the form of 'landscape mitigation' of a predetermined engineering proposal and technical appraisal*' (page 19). As set out in Planning Policy Wales (5.9.21), '*low carbon energy developments should, wherever possible, consider how to avoid, or otherwise minimise, adverse impacts through careful consideration of location, scale, design and other measures*' which we advise includes the extent and layout/arrangement of PV modules, design of ancillary elements, and existing and proposed landscape mitigation. The Alternatives and Design Evolution chapter of the Environmental Statement should explain how landscape and visual considerations have informed and shaped the proposals, including site selection, the extent and layout of the modules, and landscape mitigation.

## **Protected sites**

The proposal is hydrologically linked to the Pembrokeshire Marine Special Area of Conservation (SAC). We agree that the SAC will need to be considered within the Environmental Impact Assessment as outlined in section 7.2.2. The proposal will also need to be considered under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) in due course.

We agree with the topics to be scoped in for biodiversity. Specifically in section 7.3.6, we welcome the consideration of hydrology and pollution (dust generation, pollution of aquatic habitats) in the Environment Impact Assessment (EIA), given the hydrological link to Pembrokeshire Marine SAC.

We note the intention to submit a Construction Environmental Management Plan (CEMP). We advise these details measures are included in the CEMP to prevent any run-off/pollution from construction entering the nearby watercourses.

The CEMP should include:

- Construction methods: details of materials, how waste generated will be managed.
- General Site Management: details of the construction programme including timetable, details of site clearance; details of site construction drainage, containments areas, appropriately sized buffer zones between storage areas (of

spoil, oils, fuels, concrete mixing and washing areas) and any watercourse or surface drain.

- Biodiversity Management: details of tree and hedgerow protection; invasive species management; species and habitats protection, avoidance and mitigation measures.
- Soil Management: details of topsoil strip, storage and amelioration for re-use.
- 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.
- Control of Nuisances: details of restrictions to be applied during construction including timing, duration and frequency of works; details of measures to minimise noise and vibration from piling activities, for example acoustic barriers; details of dust control measures; measures to control light spill and the conservation of dark skies.
- Resource Management: details of fuel and chemical storage and containment; details of waste generation and its management; details of water consumption, wastewater and energy use
- Traffic Management: details of site deliveries, plant on site, wheel wash facilities
- Pollution Prevention: demonstrate how relevant [Guidelines for Pollution Prevention](#) and best practice will be implemented, including details of emergency spill procedures and incident response plan.
- Details of the persons and bodies responsible for activities associated with the CEMP and emergency contact details
- Landscape/ecological clerk of works to ensure construction compliance with approved plans and environmental regulations.

## Land contamination

Information reviewed: Alleston Solar Farm, Pembrokeshire Environmental Impact Assessment Scoping Report, (Stantec, November 2023, ref: 32516/A5/EIAScoping)

We note that the proposed development is sited wholly on undeveloped agricultural land, and we therefore accept the conclusion that contaminated land is to be scoped out of the EIA.

We also note that connection to the electricity grid will be via overhead pylon cabling. If any underground cabling is proposed we refer the applicant to position statement C5 of the [Environment Agency's approach to groundwater protection](#) which refers to fluid filled cables which are below the groundwater table.

All works should also be undertaken in accordance with the relevant Pollution Prevention Guides available [here](#).

## Flood risk

Our Flood Risk Map confirms the site includes a very small area of Zone C2 of the Development Advice Map (DAM) contained in Technical Advice Note (TAN) 15: Development and Flood Risk (2004). The Flood Map for Planning identifies the application site to be at risk of flooding and partially falls into Flood Zone 2/3 Rivers/Sea.

We have no further comments to make at this stage and would welcome the opportunity to review the detailed Flood Consequences Assessment to be submitted in support of the planning application.

### **Other Matters**

Our advice is made without prejudice to comments we may subsequently wish to make when consulted on any planning application, the submission of more detailed information or an Environmental Statement.

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

In addition to planning permission, you are advised to ensure all other permits/consents/licences relevant to the development are secured. Please refer to our [website](#) for further details.

Further advice on the above matters could be provided prior to your planning application being submitted, however there would be a charge for this service. Additional details are available on our [website](#).

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

### **G Cuthbert**

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning  
Cyfoeth Naturiol Cymru/Natural Resources Wales

E-bost/E-mail: [swplanning@cyfoethnaturiolcymru.gov.uk](mailto:swplanning@cyfoethnaturiolcymru.gov.uk)

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.



Chris Pang  
PEDW

Sent by email:  
[PEDW.Infrastructure@gov.wales](mailto:PEDW.Infrastructure@gov.wales)

Eich cyfeirnod  
Your reference

Ein cyfeirnod  
Our reference


Dyddiad  
Date

Llinell uniongyrchol  
Direct line

Ebost  
Email:

CAS-03072-D7X6N7

19 December 2023

  
[Cadwplanning@gov.wales](mailto:Cadwplanning@gov.wales)

Dear Chris Pang,

### **Alleston Solar Farm, Alleston Farm, Pembrokeshire**

Thank you for your letter of 16 November asking for Cadw's advice on the scope of the Environmental Impact Assessment (EIA) and the proposed methodologies outlined in the Scoping Report.

Cadw, as the Welsh Government's historic environment service, has assessed the characteristics of this proposed development and its location within the historic environment. In particular, the likely impact on designated or registered historic assets of national importance. In assessing if the likely impact of the development is significant Cadw has considered the extent to which the proposals affect those nationally important historic assets that form the historic environment, including scheduled ancient monuments, listed buildings, registered historic parks, gardens and landscapes.

These views are provided without prejudice to the Welsh Government's consideration of the matter, should it come before it formally for determination.

#### Advice

This advice is given in response to scoping opinion as to the contents of an Environmental Impact Assessment (EIA) that will be submitted in support of an application for the Alleston Solar Farm.

The scoping request is accompanied by a scoping report produced by Stantec, with chapter 4 considering the Historic Environment. This identifies that grade II listed building 84963 Alleston, is located inside the proposed development and an accompanying heritage note produced by the Pegasus Group indicates that there the proposed solar farm could have a damaging effect on its' setting. As such, the EIA will need to fully consider this potential impact and identify measures that can be introduced into the design of the solar farm to mitigate this impact.

The chapter indicates that a Historic Environment Desk-based Assessment (HEDBA) will be produced meeting the standards and guidance of the Chartered Institute for Archaeologists. This work will need to include reviews of all relevant LIDAR information and should provide an appropriate initial assessment of the archaeological resource inside the proposed development area. However, the results of this work may indicate that buried archaeological features are located inside the area that will need further investigation by geophysical survey and/or archaeological evaluation to establish its nature, extent, and importance. If this additional work is required, it will need to be carried out before the EIA is completed.

The HEDBA will also need to assess the impact of the proposed development on the setting of the above designated historic assets, which are located inside 3km of the proposed development. This should be carried out in accordance with the Welsh Government guidance given in the document "The Setting of Historic Assets in Wales". We would expect a stage 1 assessment to be carried out for all of the designated historic assets listed in Annex A, which will determine the need, if necessary, for stages 2 to 4 to be carried out for specific historic assets. The results of the Stage 1 assessment should be included in the EIA as an appendix.

The list of historic assets in Annex A, includes two registered historic landscapes. The likely impact of the proposed development is not sufficient to require an ASIDOHL to be produced, but this impact should be considered in the stage 1 setting assessment.

The proposed development is located in the direction of an identified significant view from the registered grade II\* Lamphey Bishop's Palace & Lamphey Court historic park and garden. It is therefore strongly recommended that the view from the forecourt of the Lamphey Court Hotel in the direction of the proposed development (the location of the identified significant view) should be added to the photographic viewpoints shown on Figure 7.11 of the scoping report, as should a view from the keep of Pembroke Castle, which is not only a scheduled monument but a grade I listed building.

Yours sincerely

Nichola Smith  
Historic Environment Branch  
Cadw

## Annex A

Our records show that the following historic assets are potentially affected by the proposal.

### Inside Development Area

#### Listed Buildings:

84963 Alleston II

#### Within a 3km developer ZTV:

#### Scheduled Monuments

PE003 Bishop's Palace, Lamphey  
PE005 Pembroke Castle  
PE015 Pembroke Town Wall  
PE157 Kingston Burial Chamber  
PE246 Hodgeston Moated Site  
PE401 Medieval Building at Kingston Farm  
PE415 Monkton Priory Dovecot  
PE435 Priory Farm Cave

#### Registered Parks and Gardens:

PGW(Dy)34(PEM) Lamphey Bishop's Palace & Lamphey Court  
PGW(Dy)34(PEM) 111 Main Street, Pembroke  
PGW(Dy)40(PEM) Monkton Old Hall & Vicarage, Pembroke

#### Registered Historic Landscape:

HLW (D) 3 Milford Haven Waterway  
HLW (D) 13 Manobier

#### Listed Buildings:

5959	Hodgeston Parish Church	II*
5960	Hodgeston Hall	II
5962	Church of St Tyfie and St Faith	II
5963	Baker's Cottage	II
	Upright Grave Slab in Old School House Wall (Formerly	
5964	included with Lamphey Church)	II
5965	Old School House	II
5966	Court House	II
5968	Lamphey Court	II*
5969	Old Chimney in garden of No. 25	II
5970	Portclew House	II
5989	Upper Nash Farmhouse	II
6310	SE lime kiln at Pill Farm	II
6313	NO.4 CASTLE TERRACE,,,,,DYFED,	II
6314	Pembroke Castle	I
6327	Dovecote in field to NW of Priory Farmhouse	II*
6328	Priory Farmhouse	II*
6329	Ruinous Outbuilding to E of Priory Farmhouse	II

6330	Priory Church of Saint Nicholas Churchyard walls and gateways to Priory Church of Saint	I
6331	Nicholas	II
6332	Monkton Old Hall	I
6333	Retaining wall and garden wall to Monkton Old Hall	II
6334	Prospect Cottage	II
6335	Forecourt retaining wall to Nos. 1 and 2 Church Terrace	II
6337	Front retaining wall to No.3 Church Terrace	II
6340	Garden walls to rear of Nos. 37-43 Main Street	II
6341	NO.5 COMMON ROAD,,,,,DYFED, Walls on line of medieval town walls, including two	II
6342	medieval towers, gazebo, and lime-kiln.	II*
6343	Elm Cottage	II
6344	Wesley Chapel	II
6345	Forecourt railings, gates & gate piers to Wesley Chapel	II
6353	Springfield	II
6354	Enclosing garden walls to E of Springfield	II
6355	Melbourne House	II
6357	Holyland Outbuilding range at Kingston Farm to SE of old	II
6363	farmhouse	II*
6373	The Lion Hotel	II
6374	NO.9 MAIN STREET,,,,,DYFED,	II
6375	Nos. 11 & 11a Main Street (Willing House)	II
6376	The Old King's Arms	II
6377	The Town Hall	II
6378	NO.29 MAIN STREET,,,,,DYFED,	II
6380	Picton House	II
6381	York Tavern	II
6382	The Old Chapel	II
6383	Pembroke Market Emporium (Former National School)	II
6384	Elm Tree House	II
6385	Nos 89/91 Main Street	II*
6386	Outbuilding adjoining SE end of No. 91 Main Street	II
6387	Tabernacle Congregational Church Forecourt wall, gates and gateposts to Tabernacle	II
6388	Congregational Church	II
6389	Swiss Cottage	II
6391	Wiln House	II
6392	NO.101 MAIN STREET,,,,,DYFED,	II
6393	St Oswalds	II
6394	NO.105 MAIN STREET,,,,,DYFED,	II
6395	Penfro Front garden wall, railings, gatepiers & gate to No 111,	II*
6396	with penny postage stamp machine to right	II
6397	NO.113 MAIN STREET,,,,,DYFED,	II
6398	Front garden wall & gates to No. 113 Main Street N, E and W walls to the churchyard of the Church of Saint	II
6399	Mary	II
6400	Parish Church of Saint Mary	I
6401	Brick House	II
6403	NO.36 MAIN STREET,,,,,DYFED,	II
6404	Chain Back with conduit and milestone	II
6405	Woodbine with front wall and railings Tenby House including forecourt and C19 walls and	II
6407	railings	II
6408	Church of Saint Michael	II

6409	Camrose House and forecourt railings	II
6411	Barnard House with forecourt railings and gate	II
6413	NO.17 MANSEL STREET,,,,,DYFED, Walls from N of churchyard of Church of Saint Mary to	II
6418	Barnard's Tower	II
6425	NO.7 NORTHGATE STREET,,,,,DYFED,	II
6426	The Royal George	II
6427	NOS.2 & 4 NORTHGATE STREET,,,,,DYFED, Garden walls to rear of car park behind Nos. 27-35 Main	II
6429	Street	II
6430	Garden walls to rear of Nos 6-11 Westgate Hill	II
6431	South retaining walls to The Parade NO.9 PAYNTER STREET,ORANGE	II
6433	GARDENS,,,,,DYFED,	II
6453	Church of Saint Daniel NO.23 THOMAS STREET,ORANGE	I
6459	GARDENS,,,,,DYFED,	II
6463	NO.31 WEST STREET,ORANGE GARDENS,,,,,DYFED,	II
6464	Former Cromwell Brewery	II
6466	Castle Chambers including area railings	II
6467	NO.8 WESTGATE HILL,,,,,DYFED,	II
6468	Flemish Cottage	II*
6469	NO.10 WESTGATE HILL,,,,,DYFED, No 11 Westgate Hill including attached portion of West	II
6470	Gate to right NO.11 WILLIAMSON STREET,ORANGE	II
6471	GARDENS,,,,,DYFED, NO.13 WILLIAMSON STREET,ORANGE	II
6472	GARDENS,,,,,DYFED, Telephone Call-box outside garden wall of Hamilton	II
6549	House (01646 682198)	II
6550	Telephone Call-box outside Town Hall	II
6552	Clock House	II
15663	Four Mediaeval House at Upper Lamphey Park Farm	II*
15664	Barn at Upper Lamphey Barn	II
17389	Converted out building to right of Baker's Cottage	II
17390	Farm Outbuildings to Rear Yard of Court House	II
17391	Lime kiln at Cleggars Farm	II
17393	Lamphey Bishop's Palace	I
17394	Former entrance gateway to Lamphey Court	II
17395	Old Coach House	II
19238	Retaining wall to S of Town Quay	II
22763	Mount Pleasant Baptist Chapel	II
22764	Westgate Presbyterian Church and railings	II
22765	Gates and railings at Mount Pleasant Baptist Chapel	II
84940	'The Old Conduit'	II
84941	Prospect House	II
84942	Eaton House and forecourt railings	II
84943	,126,Main Street,,,,	II
84944	No 16 East Back and adjoining shop	II
84945	,16,East Back,,,,	II
84946	,18,Main Street,,,,	II
84947	,2,Castle Terrace,,,,	II
84948	,28,Main Street,,,,	II
84949	Westgate House	II
84950	Pembroke Castle Shop	II
84951	Henry's Gift Shop with house over	II

84952	,5,Westgate Hill,,,,,	II
84953	,57,Main Street,Pembroke,Pembroke,,	II
84954	,63,Main Street,,,,,	II
84955	Clifton House	II
84956	,82,Main Street,,,,,	II
84957	No 93 and forecourt railings	II
84959	115 Main Street,,,Pembroke,,,SA71 4DB	II
84960	64 & 66 & 68 Main Street including forecourt gatepiers and railings	II
84961	7 Mansel Street (Alpine House) including area railings	II
84962	83 + 85 Main Street,,,,,Pembroke,,,SA71 4DB	II
84964	Barclays Bank	II
84965	Castle Inn	II
84966	Clare Cottage and front railings	II
84967	Cromwell House	II
84968	Elmside	II
84969	Former Drill Hall front buildings	II
84970	Gates at SW, and railings to S and W sides of churchyard of St Mary	II
84971	Gatepiers and gates to St Michael's Churchyard	II
84972	Guy Thomas Estate Agents	II
84973	Hamilton House	II
84974	Hay's House / Arthur's House	II
84975	No 62 and forecourt railings	II
84976	Shaftesbury House, forecourt wall and rails and house to left	II
84977	Lychgate to churchyard of Church of Saint Daniel	II
84978	Marven House and forecourt wall and railings	II
84979	Mendus Pharmacy	II
84980	Milepost on A4075 opposite Holyland	II
84981	Oakfield House including forecourt railings	II
84982	NW lime kiln at Pill Farm	II
84983	Old Cross Saws Inn	II
84984	Orielton House	II
84985	Pembroke House	II
84986	Post Office	II
84987	Railings to 93 Main Street,,,,,,	II
84988	Stable range at Holyland	II
84989	War memorial	II
87553	Lamphey House (also known as the Old Malthouse)	II



Ref: DNS CAS-03072-D7X6N7

Chris Pang  
Planning Officer  
Planning and Environment Decisions Wales  
Crown Buildings  
Cathays Park  
Cardiff  
CF10 3NQ

Via Email: [PEDW.Infrastructure@gov.wales](mailto:PEDW.Infrastructure@gov.wales)

21<sup>st</sup> December 2023.

Dear Chris Pang,

**Re: Scoping Direction Consultation Response – DNS CAS-03072-D7X6N7 – Proposed Alleston Solar Farm, Lamphey, Pembrokeshire.**

In reference to the recent e-mail from PEDW consulting the Department on the above Scoping Direction request, the Department offers the following response for your consideration regarding agricultural land quality, the use of soil and peat resources.

For the Department, the key issues likely to be significantly affected by the development are:

- Best and Most Versatile (BMV) agricultural land.
- Maintaining soil services and functions.

**1. Agricultural Land Classification (ALC) Survey - Technical Assessment and Advice:**

The majority of the proposed site within the redline boundary has been surveyed in full detail (excluding approx. 10ha in the north - see map at Annex 1). An ALC report of the site has been prepared by Amet Property (Ref: Agricultural Land Classification, Alleston Farm – 26<sup>th</sup> June 2023 – Issue 2) and a copy is attached for information.

The report found the survey area to be 4.3ha Grade 2, 32.3ha Subgrade 3a, 42.00ha Subgrade 3b and 5.8haha 'non-agricultural' land – a total of 84.40ha surveyed. The Department has previously undertaken a validation of the survey report and can confirm it

has been undertaken in accordance with the 'Revised Guidelines and Criteria for Grading the Quality of Agricultural Land' (MAFF 1988)<sup>1</sup>.

The 10ha unsurveyed area in the north of the proposed site is noted as mainly Grade 2, with some Subgrade 3b on the Predictive ALC map (see Annex 1).

As per published Departmental Guidance<sup>2</sup>, where the Predictive ALC Map identifies grades 1, 2 or 3a, a survey will be required to determine Grades present and in what proportion. Should any party refuse or neglect to commission a survey, or the survey is not accepted by the Welsh Government, the Predictive ALC Map Grade should be accepted as the best available information.

**Therefore, the proposed application may contain in excess of 40ha of BMV agricultural land.**

## **2. Best and Most Versatile (BMV) agricultural land policy.**

As the proposed site contains a significant area of BMV agricultural land, the Department expects the applicant to provide clear evidence of how PPW paragraph 3.58 and 3.59 has been addressed in:

- i. how '*considerable weight*' is given to protecting BMV land from development.
- ii. demonstrating an '*overriding need*' if BMV land needs to be developed, and
- iii. clear application of the sequential test approach.

The Department would highlight the policy clarification in the DCPO letter of 1<sup>st</sup> March 2022 regarding '*BMV agricultural land and solar PV arrays*', and the recent DNS Decision on a solar PV application involving BMV agricultural land (DNS/3247619 - Elwy Solar Energy – Refused<sup>3</sup>).

## **3. Policy Context:**

The Department has examined the EIA Screening Report and consider the policies and guidance below are also applicable to this development: -

- Technical Advice Note (TAN)<sup>6</sup>
- Paragraph 3.58 and 3.59 of Planning Policy Wales (PPW)<sup>5</sup>.
- Paragraph 6.4.3 (bullet 4) of PPW

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<sup>1</sup><https://publications.naturalengland.org.uk/publication/6257050620264448?category=5954148537204736>

<sup>2</sup> <https://www.gov.wales/agricultural-land-classification-predictive-map-guidance>

<sup>3</sup><https://planningcasework.service.gov.wales/api/documents/download/A46366124?hash=16931c2b386205840f256153b4c564c9d2e349cdb050c86a053138eb98d3f440>

<sup>4</sup> <https://www.gov.wales/technical-advice-note-tan-6-planning-sustainable-rural-communities>

<sup>5</sup> <https://www.gov.wales/planning-policy-wales>



- Policy 9 of the National Development Framework (NDF) – Future Wales<sup>6</sup>
- Policy 17 of NDF Future Wales - states '*all proposals should demonstrate that they will not have an unacceptable adverse impact on the environment*'.
- Policy 18(11) of NDF Future Wales – sets out the requirement for '*...acceptable provisions relating to the decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration*'.
- DCPO letter – '*BMV agricultural land and solar PV arrays*' – 1<sup>st</sup> March 2022<sup>7</sup>

#### **4. Baseline information:**

The location and extent of soils on site and their physical characteristics would be beneficial to assess potential impacts and inform decisions on infrastructure siting and decommissioning, restoration and beneficial after use of the site. The volumes of soil units that will be excavated for any on site infrastructure should be clear and based on survey evidence (this may be derived from the ALC survey information in part).

#### **5. Infrastructure and potential impacts on soil functions (installation and decommissioning).**

The type, location and level of infrastructure proposed as part of the development will need to be fully detailed for the assessment. The scoping report only provides information on pile depth (Section 2.4.4). No information is provided on the total number and spacing of piles installed; the extent of cable trenching and if any imported fill materials used (e.g. cement bound sand), track extent type and location, inverter pads number and locations and areas for construction compounds, etc.

The assessment will need to provide detailed information on the methodology for the installation and decommissioning of the infrastructure and, considering the soils on site, how any likely impacts have been assessed and avoided.

#### **6. Soil Management Scheme (SMS).**

Mineral, organo-mineral and peat soils are finite and provide crucial ecosystem services to Wales. These services include food, fibre, water and important contributions to climate regulation, biodiversity and protection from natural disasters. A soil management scheme should be prepared by the applicant, informed by the baseline ALC report and soil resources and physical characteristics, and be considered as part of the ES process.

The SMS should be a clear scheme and programme setting out how all soils and their function will be conserved and reinstated and that can be confidently conditioned against.

The SMS should be presented in sufficient detail for the determining authority and statutory consultees to form a judgement as to its feasibility, and should include: -

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<sup>6</sup> <https://www.gov.wales/future-wales-national-plan-2040-0>

<sup>7</sup> <https://www.gov.wales/best-and-most-versatile-agricultural-land-and-solar-pv-arrays>

- Soil stripping programme - volumes and types of soils affected.
- Soil handling techniques and procedure.
- Size, location, construction, management, and period of soil storage dumps.
- Proposed after use and restoration programme, including techniques and aftercare programme.

The advice expressed does not bind any other part of Welsh Government commenting on the proposal. I trust the above comments are clear and unambiguous.

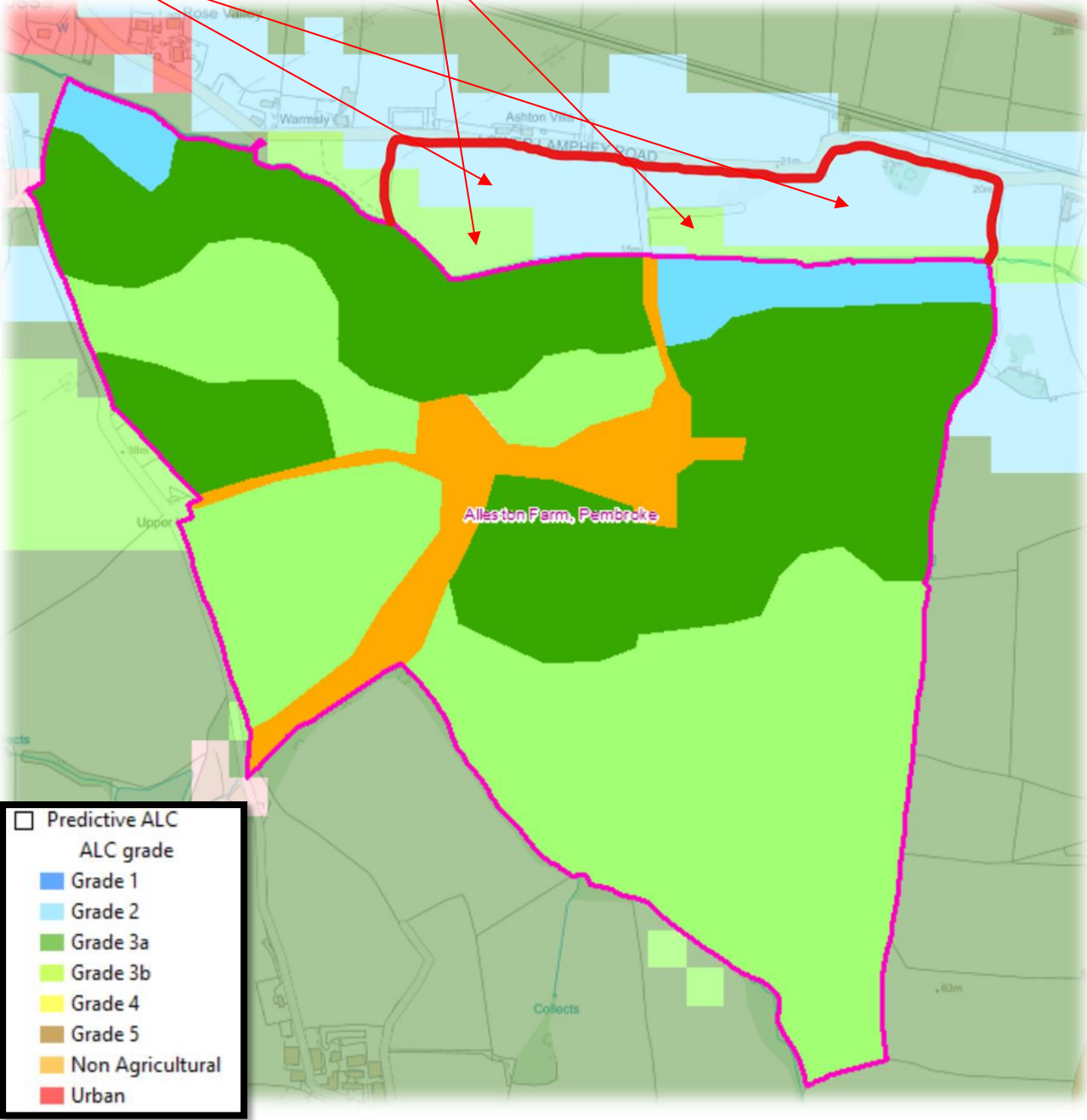
Yours sincerely

Arwel Williams  
Soil, Peatland & Agricultural Land Use Planning  
Welsh Government  
Department for Climate Change  
Landscapes, Nature & Forestry Division  
[LQAS@gov.wales](mailto:LQAS@gov.wales)

Enc. Agricultural Land Classification Report, Alleston Farm – 26th June 2023 – Issue 2

**Annex 1 – Predictive ALC Map<sup>8</sup> Grading of unsurveyed area.**

Grade 2 (light blue) and Subgrade 3b (light green).



<sup>8</sup> <https://www.gov.wales/agricultural-land-classification-predictive-map>



**AGRICULTURAL LAND CLASSIFICATION  
ALLESTON FARM**

CLIENT: ALLESTON CLEAN ENERGY  
PROJECT: ALLESTON FARM  
DATE: 26<sup>TH</sup> JUNE 2023 – ISSUE 2  
ISSUED BY: JAMES FULTON MRICS FAAV

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## 1. EXECUTIVE SUMMARY

- 1.1 This report assesses the Agricultural Land Classification (ALC) grading of 84.4 Hectares of land at Alleston Farm, Pembrokeshire.
- 1.2 The limiting factor found to be soil wetness, a combination of the climatic regime, soil water regime and texture of the top 25cm of the soil.
- 1.3 The land is graded as follows:

Grade 2:	4.3 Ha
Grade 3a:	32.3 Ha
Grade 3b:	42 Ha
Non-Agricultural	5.8 Ha

## 2. INTRODUCTION

- 2.1 Amet Property Ltd have been instructed by Alleston Clean Energy to produce an Agricultural Land Classification (ALC) report on an 84.4-hectare site on land at Alleston Farm, Pembroke.
- 2.2 The report's author is James Fulton BSc (Hons) MRICS FAAV who has worked as a chartered surveyor, agricultural valuer, and agricultural consultant since 2004, has a degree in agriculture which included modules on soils and over 10 years' experience in advising farmers on soil structure and cultivation methods and in producing agricultural land classification reports. Additional information on authors experience is found at **appendix 1**.
- 2.3 The report is based on a site visit conducted by James Fulton and 1 assistant surveyor on the 1<sup>st</sup> and 2<sup>nd</sup> April 2023 during which the conditions were rain first thing on the 1<sup>st</sup> and then brightened up for the rest of the survey. Soils were moist at all horizons.
- 2.4 During the inspections 3 trial pits were dug to a depth of 120cm. In addition to the trial pits an auger was used to take approximately one sample per hectare on the proposed development site to a depth of 120cm (or as deep as possible if sample points became impenetrable) with smaller trial pits at some of these locations to confirm soil structure and colour where it was not clear from the auger samples. A plan of auger points and trial pit locations can be found at **appendix 2**. The trial pit locations were selected as they were representative of the soils found on site. Where subsoils were inspected with a spade, descriptions of structure have been recorded based on the soil survey field handbook<sup>1</sup>; where an auger has been used the structure is described as good, moderate or poor based on figure 9, 10 and 11 in the MAFF<sup>2</sup> guidance. Colours are described using Munsell Colours<sup>3</sup>.
- 2.5 The surveyed area extends to 84.4Ha of which 75.6Ha is agricultural. The land is a mixture of arable and grassland made up of 10 fields and a lot of small paddocks used for grazing horses. The site is centred around Alleston Farm accessed from the Lower Lamphey Road to the north with the centre of the site being approximately 1 mile southeast of Pembroke.
- 2.6 Further information has been obtained from the MAGIC website, the Soil Survey of England and Wales, the British Geological Survey, the Meteorological Office and 1:250,000 series Agricultural Land Classification maps.

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<sup>1</sup> Hodgson, JM (1997) Soil Survey Field Handbook

<sup>2</sup> MAFF (1988) - *Agricultural Land Classification of England and Wales. Revised guidelines and criteria for grading the quality of agricultural land*. MAFF Publications

<sup>3</sup> Munsell Color (2009) Munsell Soil Color Charts

- 2.7 The collected information has been judged against the Ministry of Agriculture Fisheries and Food Agricultural Land Classification of England and Wales revised guidelines and criteria for grading the quality of agricultural land.
- 2.8 The principal factors influencing agricultural production are climate, site and soil and the interaction between them MAFF (1988) & Natural England (2012)<sup>4</sup>.
- 2.9 The report is prepared and formatted considering the latest BSSS guidance<sup>5</sup>.

### **3. PUBLISHED INFORMATION**

- 3.1 The British Geological Survey 1:50,000 scale map shows the bedrock geology to be extremely variable with a strip running east west of Black Rock Subgroup and Gully Oolite Formation – Limestone to the north of the site. Another strip running east west of Avon Group – Limestone and Mudstone, interbedded is identified around the area of the farmyard. Next moving south is a strip of Skrinkle Sandstone Formation - sandstone and then a strip of Ridgeway Conglomerate Formation – conglomerate. Finally the most southerly part of the site is described as Milford Haven Group – Argillaceous rocks and sandstone, interbedded.
- 3.2 The soils to the north of the site are identified as being East Keswick 3 Association – Well drained fine loamy soils often deep but sometimes over limestone. The soils to the south of the site are identified as Milford Association – Well drained fine loamy reddish soils over rock.
- 3.3 The WAG predictive agricultural land classification map shows a strip to the north of the site being grade 2, most of the rest of site as grade 3a and some small areas to the west and on the steep slopes being grade 3b.

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<sup>4</sup> MAFF (1988) - *Agricultural Land Classification of England and Wales. Revised guidelines and criteria for grading the quality of agricultural land.* MAFF Publications

Natural England (2012) - *Technical Information Note 049 - Agricultural Land Classification: protecting the best and most versatile agricultural land, Second Edition*

<sup>5</sup> BSSS (2022) Working with Soil Guidance Note on Assessing Agricultural Land Classification Surveys in England and Wales



#### 4. CLIMATE

- 4.1 Climate has a major, and in places overriding, influence on land quality affecting both the range of potential agricultural uses and the cost and level of production.
- 4.2 There is published agro-climatic data for England and Wales provided by the Meteorological Office, such data for the subject site is listed in the table below.

Agro-Climatic Data – Full details can be found at **appendix 3**

Grid Reference	200377 200055
Altitude (ALT)	31
Average Annual Rainfall (AAR)	1117
Accumulated Temperature - Jan to June (ATO)	1538
Duration of Field Capacity (FCD)	227
Moisture Deficit Wheat	84
Moisture Deficit Potatoes	71

- 4.3 The north of the site has lower rainfall which because the cutoff for wetness is 225FCD may have an impact on land grade. An assessment of the number of Field Capacity days of the relevant sample points has been carried out and can be found at **appendix 3**.
- 4.4 The main parameters used in assessing the climatic limitation are average annual rainfall (AAR), as a measure of overall wetness; and accumulated temperature (ATO), as a measure of the relative warmth of a locality.
- 4.5 The AAR and ATO limit the site to grade 2
- 4.6 There was no evidence of flooding seen during the site visit and it is considered that flood risk will not result in a limitation to land grade.

## 5. STONINESS

- 5.1 The whole site had between 5% and 15% stones in the topsoil. The stones were small to medium in size usually between 1 cm and 4cm across with lines of larger stones that had possible been pulled up by a subsoiler or other mechanical operation. Stones are hard and subangular.



The sample points became impenetrable to a soil auger at various depths which was due to a layer of tightly meshed small to medium sized stones rather than a rock layer.

## 6. GRADIENT AND MICRORELIEF

- 6.1 The gradient across most of the site is gently sloping with certain areas around the watercourse to the south where the slope is between 8 and 10 degrees resulting in a grade 3b limitation.



## 7. SOILS

- 7.1 The soils found on site largely follow the expectations set by the national soils map. Full information on the sample points along with trial pit descriptions and photographs and lab test results can be found at **appendix 4**.
- 7.2 The topsoil is either dark brown (7.5YR 3/4 or occasionally 3/3) or dark reddish brown (5YR 3/4). The topsoil texture is either heavy clay loam or medium clay loam and even where it is a medium clay loam it is only 2% to 3% less clay than a heavy clay loam.
- 7.3 There are 2 very distinct subsoils. The first is brown (7.5YR 4/4) or occasionally reddish brown (5YR 4/4) clay or heavy clay loam with a medium angular blocky or coarse subangular blocky structure. The second is a dark yellowish brown (10YR 4/4) coarse sandy loam. The coarse sandy loam subsoils are all to the east of the site predominantly in the northeast corner.
- 7.4 Where subsoils could be identified (prior to finding an impenetrable layer) it was very rare to be able to identify an upper and lower subsoil. Usually just one subsoil was identified either to the full depth of the auger or to an impenetrable layer.
- 7.5 A mat of small to medium sized stones often prevented augering at between 25 and 80cm. Because this was identified as a layer of stones rather than rock it is assumed that at all points soil continued beneath the stone layer and so soil depth is not considered to be a limiting factor.

## INTERACTIVE FACTORS

### 8. WETNESS

- 8.1 An assessment of the wetness class of each sample point was made based on the flow chart at Figure 6 in the MAFF guidance. The wetness class and topsoil texture were then assessed against Table 6 of the MAFF guidance to determine the ALC grade according to wetness. The wetness assessment can be found at **appendix 4**.
- 8.2 There is no slowly permeable layer or gleying identified on site and so the site is assessed as wetness class I.
- 8.3 Table 6, wetness class I, >225 FCD gives a limit of grade 3a for medium clay loam topsoil and grade 3b for heavy clay loam topsoil. On areas to the north where the rainfall is lower Table 6, wetness class I, 176-225 FCD gives a limit of Grade 2 for medium clay loam topsoil and grade 3a for heavy clay loam topsoil.

### 9. DROUGHTINESS

- 9.1 Droughtiness limits are defined in terms of moisture balance for wheat and potatoes using the formula:

$$MB \text{ (Wheat)} = AP \text{ (Wheat)} - MD \text{ (Wheat)}$$

and

$$MB \text{ (Potatoes)} = AP \text{ (Potatoes)} - MD \text{ (Potatoes)}$$

Where:

MB = Moisture Balance

AP = Crop Adjusted available water capacity

MD = Moisture deficit

- 9.2 Moisture deficit for wheat and potatoes can be found in the agro-climatic data and are as follows:

$$MD \text{ (Wheat)} = 84$$

$$MD \text{ (Potatoes)} = 71$$

- 9.3 Crop adjusted available water is calculated by reference to the total available water and easily available water which is calculated by reference to soil texture and structural condition and the stone content.
- 9.4 The moisture balance was calculated for the trial pit locations and locations and can be found at **appendix 4**.

9.5 Because it was found that the stone layer that made the sample point impenetrable to the soil auger was made of small stones and had soil below it, droughtiness is not considered to be a significant limitation to land grade.

**10. AGRICULTURAL LAND CLASSIFICATION**

10.1 The Agricultural Land Classification provides a framework for classifying land according to which its physical or chemical characteristics impose long-term limitations on agricultural use. The limitations can operate in one or more of four principle ways: they may affect the range of crops that can be grown, the level of yield, the consistency of yield and the cost of obtaining it.

10.2 The principle physical factors influencing agricultural production are climate, site and soil and the interactions between them which together form the basis for classifying land into one of 5 grades; grade 1 being of excellent quality and grade 5 being land of very poor quality. Grade 3 land, which constitutes approximately half of all agricultural land in the United Kingdom is divided into 2 subgrades – 3a and 3b. A full definition of all of the grades can be found at **appendix 5**.

10.3 This assessment sets out that the site is limited by wetness.

10.4 The breakdown of land by classification is:

Grade 2:	4.3 Ha
Grade 3a:	32.3 Ha
Grade 3b:	42 Ha
Non-Agricultural	5.8 Ha

10.5 A plan of the land grading can be found at **appendix 6**.

## **Appendix 1 – Details of the Authors Experience**

James Fulton

### **Professional Education and Qualifications**

BSc (Hons) Agriculture, University of Nottingham (2004)

Member of the Royal Institution of Chartered Surveyors (MRICS) (2008)

Fellow of the Central Association of Agricultural Valuers (FAAV) (2009)

### **Relevant Work Experience**

While working for a regional firm from 2004 until 2016 as part of my work I provided advice to farmers on soils, cultivation techniques and cropping and was involved in field trials which assessed cropping and cultivation techniques and how they impacted soil structure. At the same time I worked alongside an experienced surveyor who produced Agricultural Land Classification reports and I received training in field survey techniques and the ALC process to the point where I was able to produce ALC reports.

In 2016 I left my employer and formed Amet Property Ltd providing development consultancy and other rural practice surveying services. Of all of the services that we provide Agricultural Land Classification reports is the single largest area of work accounting for approximately 70% of all of my working time.

While I am not a member of the BSSS I meet the minimum competencies set out by the BSSS in Document 1 *Foundation skills in field soil investigation, description and interpretation* and Document 2 *Agricultural Land Classification (England and Wales)*

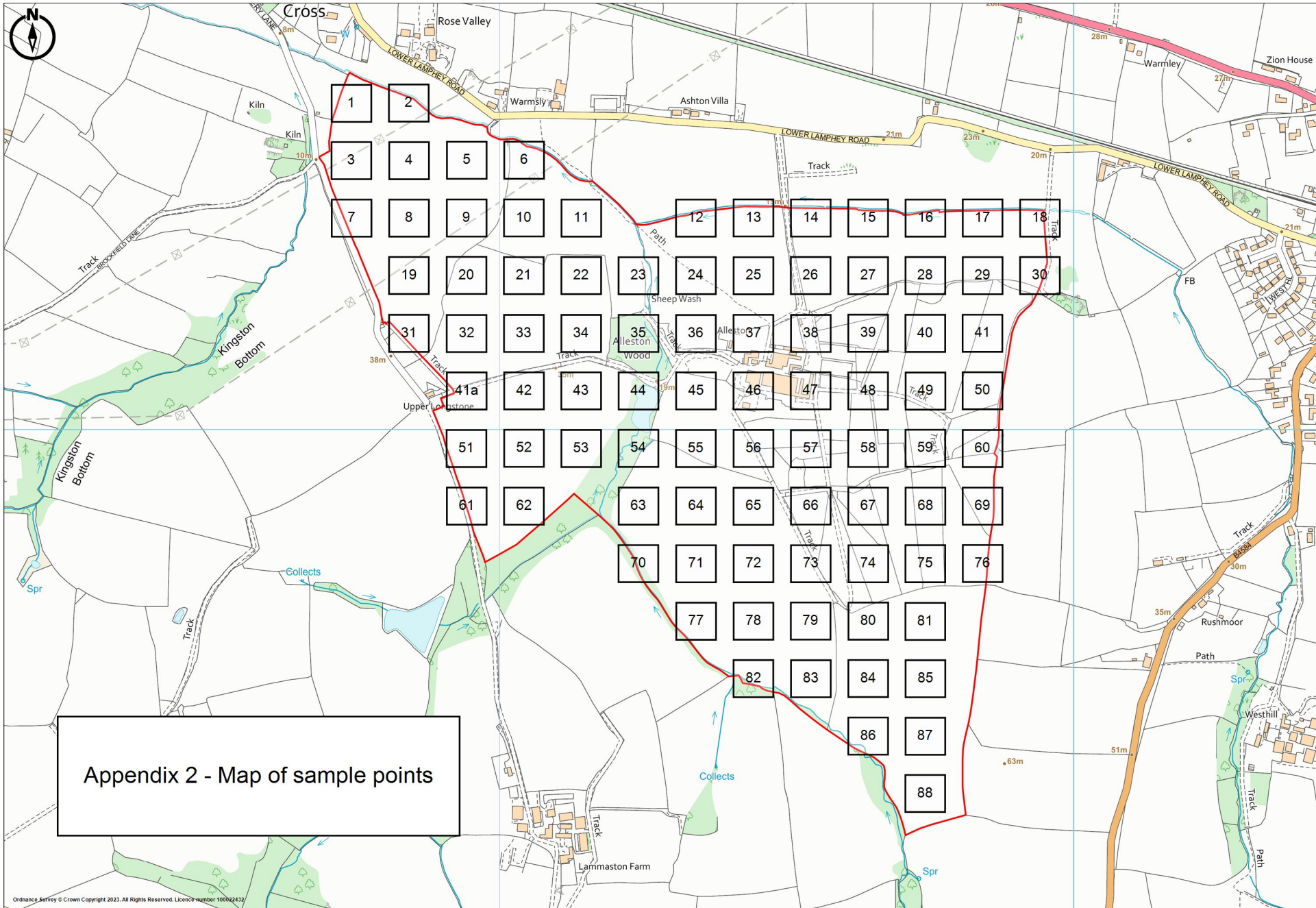
### **Professional Standards**

As a member of the Royal Institution of Chartered Surveyors and Fellow of the Central Association of Agricultural Valuers I am bound by their professional standards and am only able to carry out work where I am suitably qualified and experienced to do so. Due to the formal and practical training that I have received I am able to competently produce Agricultural Land Classification reports.

### **Assistant Surveyors**

All assistant surveyors have completed the BSSS working with soil course and have been trained to meet the requirements of BSSS Document 1 *Foundation skills in field soil investigation, description, and interpretation*.





Appendix 2 - Map of sample points

Ordnance Survey © Crown Copyright 2023. All Rights Reserved. Licence number 100022432

### Appendix 3 – Climatic Data

Site Details: Alleston Farm

Grid reference (centre of site): 200377 200055

Altitude: Mean 31.36m AOD

Climatic data from surrounding locations:

Grid Reference	ALT	AAR	LR_AAR	ASR	ATO	ATS	MDW	MDP	FCD
20002000	25	1110	1.2	470	1545	2410	85	73	226
20002050	19	1101	1.3	480	1550	2416	84	72	226
20502000	46	1114	1.5	485	1520	2384	81	67	226
20502050	46	1121	2.3	510	1518	2382	77	63	229

Altitude Adjusted

Grid Reference	AAR	ATO	FCD	MDW	MDP	Proximity Adjustment
20002000	1117.63	1537.75	227.10	83.81	71.44	98.44%
20002050	1117.07	1535.91	228.32	81.61	68.86	0.58%
20502000	1092.04	1536.69	222.82	84.04	70.98	0.67%
20502050	1087.33	1534.69	224.13	80.86	68.03	0.31%





Sample point	Easting	Northing	Altitude	FCD	Column in Table 6
1	199700	200500	14	224.01	176-225
2	199800	200500	14	224.02	176-225
3	199700	200400	15	224.21	176-225
4	199800	200400	15	224.22	176-225
5	199900	200400	14	224.05	176-225
6	200000	200400	15	224.22	176-225
7	199700	200300	18	224.75	176-225
8	199800	200300	19	224.93	176-225
9	199900	200300	21	225.28	>225
10	200000	200300	20	225.11	>225
11	200100	200300	17	224.58	176-225
12	200300	200300	15	224.21	176-225
13	200400	200300	14	224.01	176-225
14	200500	200300	15	224.16	176-225
15	200600	200300	16	224.29	176-225
16	200700	200300	18	224.6	176-225
17	200800	200300	19	224.72	176-225
18	200900	200300	18	224.48	176-225
22	200100	200200	19	224.95	176-225
23	200200	200200	19	224.94	176-225
24	200300	200200	19	224.92	176-225
25	200400	200200	19	224.9	176-225
26	200500	200200	20	225.05	176-225
27	200600	200200	21	225.19	>225
28	200700	200200	21	225.15	>225
29	200800	200200	21	225.1	>225
30	200900	200200	22	225.21	>225
35	Non-Agricultural				
40	200700	200100	24	225.68	>225
41	200800	200100	23	225.46	>225

Appendix 4 - Assessment of sample points

Sample No	Altitude	Topsoil					Upper Subsoil					Lower Subsoil					Grade limit by Gradient	Wetness Assessment			Grade limit by Wetness	Grade by most limiting factor	
		Depth	Texture	Colour	Stoniness	Mottles	Depth	Texture	Colour	Stoniness	Mottles	Structure	Depth	Texture	Colour	Stoniness		Mottles	Structure	Depth to SPL			Gley
1	14	0-30	MCL	7.5YR 3/4	10%		30-80	HCL	7.5YR 4/4	5%		Moderate	80	IMP						I	2	2	
2	14	0-30	MCL	7.5YR 3/4	10%		30-75	HCL	7.5YR 4/4	5%		Moderate	75	IMP						I	2	2	
3	15	0-30	HCL	7.5YR 3/4	10%		30-80	C	7.5YR 4/4	5%	CG	Moderate	80	IMP						I	3a	3a	
4	15	0-30	MCL	7.5YR 3/4	10%		30-80	HCL	7.5YR 4/4	5%		Moderate	80	IMP						I	2	2	
5	14	0-30	HCL	7.5YR 3/3	10%		30	IMP												I	3a	3a	
6	15	0-35	HCL	7.5YR 3/3	10%		35-75	C	7.5YR 4/4	5%	COG	Moderate	75	IMP						I	3a	3a	
7	18	0-30	HCL	7.5YR 3/4	10%		30-80	C	7.5YR 4/4	5%	CG	Moderate	80	IMP						I	3a	3a	
8	19	0-30	HCL	7.5YR 3/4	10%		30-80	C	7.5YR 4/4	5%	CG	Moderate	80	IMP						I	3a	3a	
9	21	0-30	MCL	7.5YR 3/4	10%		30-40	HCL	7.5YR 4/4	10%	CB	Moderate	40	IMP						I	3b	3b	
10	20	0-30	HCL	7.5YR 3/4	10%		30-120	C	7.5YR 4/4	5%	COG	MAB								I	3b	3b	
11	17	0-35	HCL	7.5YR 3/4	10%		35-50	C	7.5YR 4/4	5%		Moderate	50	IMP						I	3a	3a	
12	15	0-35	HCL	7.5YR 3/4	10%		35-50	C	7.5YR 3/4		COB	Moderate	50	IMP						I	3a	3a	
13	14	0-35	HCL	7.5YR 3/4	10%		35-60	St C	7.5YR 3/4		CB	Moderate	60-120	St C	7.5YR 4/6		CB	Poor	I	3a	3a		
14	15	0-35	MCL	7.5YR 3/4	10%		35-120	HCL	10YR 4/4	5%	FB	Moderate							I	2	2		
15	16	0-35	MCL	7.5YR 3/4	10%		35-120	cSL	10YR 4/4	5%	FB	Moderate							I	2	2		
16	18	0-35	MCL	7.5YR 3/4	10%		35-120	cSL	10YR 4/4	5%	FB	Moderate							I	2	2		
17	19	0-35	MCL	7.5YR 3/4	10%		35-120	cSL	10YR 4/4	5%	FB	Moderate							I	2	2		
18	18	0-35	MCL	7.5YR 3/4	10%		35-120	cSL	10YR 4/4	5%	FB	Moderate							I	2	2		
19	25	0-35	HCL	7.5YR 3/4	10%		35-80	C	5YR 3/4	5%	CG	Moderate	80	IMP						I	3b	3b	
20	27	0-35	HCL	7.5YR 3/4	15%		35	IMP												I	3b	3b	
21	24	0-35	HCL	7.5YR 3/4	15%		35	IMP												I	3b	3b	
22	19	0-35	HCL	7.5YR 3/4	15%		35-50	C	5YR 4/4	10%	FB	MAB	50	IMP						I	3a	3a	
23	19	0-35	HCL	7.5YR 3/4	10%		35-50	C	5YR 4/4	5%	FB	Moderate	50	IMP						I	3a	3a	
24	19	0-35	HCL	7.5YR 3/4	10%		35-75	St C	7.5YR 4/4		COG	Moderate	75	IMP						I	3a	3a	
25	19	0-35	HCL	7.5YR 3/4	10%		35-60	St C	7.5YR 4/4		COG	Moderate	60	IMP						I	3a	3a	
26	20	0-35	MCL	7.5YR 3/4	10%		35-55	St C	7.5YR 4/4	5%	FB	Moderate	55-120	C	7.5YR 4/6		FB	Poor	I	2	2		
27	21	0-35	MCL	7.5YR 3/4	10%		35-120	cSL	7.5YR 4/4	5%	FB	Moderate							I	3a	3a		
28	21	0-35	MCL	7.5YR 3/4	10%		35-75	cSL	7.5YR 4/4	5%	CB	Moderate	75	IMP						I	3a	3a	
29	21	0-35	MCL	7.5YR 3/4	10%		35-120	cSL	10YR 4/4	5%	FB	Moderate							I	3a	3a		
30	22	0-35	MCL	7.5YR 3/4	10%		35-120	cSL	10YR 4/4	5%	FB	MAB							I	3a	3a		
31	31	0-30	MCL	5YR 3/4	10%		30	IMP											I	3a	3a		
32	33	0-35	MCL	5YR 3/4	15%		35	IMP											I	3a	3a		
33	31	0-35	MCL	5YR 3/4	10%		35-40	HCL	5YR 3/4	20%	CB	Moderate	40	IMP						I	3a	3a	
34	26	0-30	HCL	5YR 3/4	10%		30-40	C	5YR 3/4	15%	COG	Moderate	40	IMP						I	3b	3b	
35	23	NOT AVAILABLE FOR AGRICULTURE																					
36	23	0-35	HCL	7.5YR 3/4	10%		35-75	St C	7.5YR 4/4		COG	Moderate	75	IMP						I	3b	3b	
37	22	0-35	HCL	7.5YR 3/4	10%		35-50	St C	7.5YR 4/4		CB	Moderate	50	IMP						I	3b	3b	
38	22	0-35	MCL	7.5YR 3/4	10%		35-65	cSL	7.5YR 4/4	5%	FB	Moderate	65	IMP						I	3a	3a	
39	25	0-35	MCL	7.5YR 3/4	10%		35-75	cSL	7.5YR 4/4	5%	FB	Moderate	75	IMP						I	3a	3a	
40	24	0-30	MCL	7.5YR 3/4	10%		30-50	cSL	5YR 3/4	5%	CB	Moderate	50	IMP						I	3a	3a	
41	23	0-30	MCL	7.5YR 3/4	10%		30-50	cSL	5YR 3/4	5%	CB	Moderate	50	IMP						I	3a	3a	
41a	37	0-30	HCL	5YR 3/4	15%		30	IMP												I	3b	3b	
42	35	0-25	HCL	5YR 3/4	25%		25	IMP												I	3b	3b	
43	31	0-45	HCL	5YR 3/4	10%		45	IMP												I	3b	3b	
44	29	NOT AVAILABLE FOR AGRICULTURE																					
45	27	0-30	MCL	5YR 3/4	10%		30-50	cSL	5YR 4/4		CGB	Moderate	50	IMP						I	3a	3a	
46	24	0-30	MCL	7.5YR 3/4	10%		30-80	C	5YR 3/4	5%	COG	Moderate	80	IMP						I	3a	3a	
47	26	0-30	MCL	7.5YR 3/4	10%		30-60	C	5YR 3/4	5%	COG	Moderate	60	IMP						I	3a	3a	
48	26	0-35	MCL	7.5YR 3/4	10%		35	IMP												I	3a	3a	
49	27	0-35	MCL	7.5YR 3/4	10%		35	IMP												I	3a	3a	
50	29	0-30	MCL	7.5YR 3/4	10%		30-50	cSL	5YR 3/4	5%	CB	Moderate	50	IMP						I	3a	3a	
51	46	0-30	HCL	5YR 3/4	5%		30	IMP												I	3b	3b	
52	43	0-30	HCL	5YR 3/4	5%		30	IMP												I	3b	3b	
53	35	0-45	HCL	5YR 3/4	10%		45	IMP												I	3b	3b	
54	29	NOT AVAILABLE FOR AGRICULTURE																					
55	29	0-30	MCL	5YR 3/4	10%		30-55	cSL	5YR 4/4		CGB	Moderate	55	IMP						I	3a	3a	
56	29	0-30	MCL	5YR 3/4	10%		30-50	cSL	5YR 4/4		CGB	Moderate	50	IMP						I	3a	3a	
57	29	0-30	MCL	7.5YR 3/4	10%		30-40	C	5YR 3/4	5%	COG	Moderate	40	IMP						I	3a	3a	
58	29	0-30	MCL	7.5YR 3/4	10%		30-50	C / HCL	5YR 4/4		COG	CSAB	50	IMP						I	3a	3a	
59	29	0-30	HCL	7.5YR 3/4	10%		30	IMP												I	3b	3b	








Sample No	Altitude	Topsoil					Upper Subsoil					Lower Subsoil					Grade limit by Gradient	Wetness Assessment			Grade limit by Wetness	Grade by most limiting factor
		Depth	Texture	Colour	Stoniness	Mottles	Depth	Texture	Colour	Stoniness	Mottles	Structure	Depth	Texture	Colour	Stoniness		Mottles	Structure	Depth to SPL		
60	29	0-30	MCL	7.5YR 3/4	10%		30	IMP												I	3a	3a
61	49	0-35	HCL	5YR 3/4	10%		35	IMP												I	3b	3b
62	41	0-35	HCL	5YR 3/4	10%		35	IMP												I	3b	3b
63	35	0-30	MCL	5YR 3/4	10%		30	IMP												I	3a	3b
64	40	0-35	MCL	5YR 3/4	10%		35	IMP												I	3a	3a
65	43	0-30	MCL	5YR 3/4	10%		30-50	cSL	5YR 4/4		CGB	Moderate	50	IMP						I	3a	3a
66	44	0-35	HCL	5YR 3/4	15%		35	IMP												I	3b	3b
67	45	0-45	HCL	5YR 3/4	15%		45	IMP												I	3b	3b
68	45	0-30	HCL	7.5YR 3/4	10%		30	IMP												I	3b	3b
69	44	0-30	HCL	7.5YR 3/4	10%		30-65	C	5YR 5/4			Moderate	65	IMP						I	3b	3b
70	40	0-30	HCL	5YR 3/4	10%		30	IMP												I	3b	3b
71	43	0-30	HCL	5YR 3/4	10%		30	IMP												I	3b	3b
72	46	0-30	HCL	5YR 3/4	10%		30	IMP												I	3b	3b
73	48	0-30	HCL	5YR 3/4	10%		30	IMP												I	3b	3b
74	50	0-20	HCL	5YR 3/4	10%		20	IMP												I	3b	3b
75	51	0-20	MCL	5YR 3/4	10%		20	IMP												I	3a	3a
76	53	0-20	MCL	5YR 3/4	10%		20	IMP												I	3a	3a
77	40	0-30	HCL	5YR 3/4	10%		30	IMP												I	3b	3b
78	46	0-30	HCL	5YR 3/4	10%		30	IMP												I	3b	3b
79	53	0-30	HCL	5YR 3/4	10%		30	IMP												I	3b	3b
80	54	0-25	HCL	5YR 3/4	10%		25	IMP												I	3b	3b
81	56	0-30	HCL	5YR 3/4	10%		30	IMP												I	3b	3b
82	44	0-30	HCL	5YR 3/4	10%		30-40	cSL	5YR 4/4	25%		Moderate	40	IMP						I	3b	3b
83	48	0-30	HCL	5YR 3/4	10%		30-75	cSL	5YR 3/4	5%	CGB	Moderate	75	IMP						I	3b	3b
84	55	0-30	HCL	5YR 3/4	10%		30	IMP												I	3b	3b
85	57	0-30	HCL	5YR 3/4	10%		30	IMP												I	3b	3b
86	49	0-30	HCL	7.5YR 3/4	10%		30-120	cSL	5YR 4/4	5%	CGB	Moderate								I	3b	3b
87	55	0-30	HCL	5YR 3/4	10%		30-120	cSL	5YR 3/4	5%	CGB	Moderate								I	3b	3b
88	54	0-30	HCL	5YR 3/4	10%		30-60	cSL	5YR 3/4	5%	CGB	Moderate	60	IMP						I	3b	3b

**Appendix 4b – Trial Pit Descriptions – Alleston Farm**

Sample Point No. 10	
Horizon 1	0-30cm - Dark brown (7.5YR 3/4) heavy clay loam (HCL) topsoil with 10% stones (0-6cm) and a weak medium sub angular blocky structure.
Horizon 2	30-120cm – Brown (7.5YR 4/4) clay subsoil with 5% stones (2-6cm) with common ochreous and grey mottles and a medium angular blocky structure.
Horizon 3	Not present
Pictures	
Horizon 1 	Horizon 2  Horizon 2 continued: 
Slowly permeable layer	Not Present
Gleying	Not present
Wetness Class	I
Wetness limitation	3b
MB Wheat	44.41
MB potatoes	35.19
Droughtiness Limitation	1

Sample Point No. 30		
Horizon 1	0-35cm - Dark brown (7.5Y 3/4) medium clay loam (MCL) topsoil with 10% stones (0-6cm) and a weak fine sub angular blocky structure.	
Horizon 2	30-120cm – Dark yellowish brown (10YR 5/4) coarse sandy loam subsoil with 5% stones (2-6cm) with few black mottles and a medium angular blocky structure.	
Horizon 3	Not present	
Pictures		
Horizon 1	Horizon 2	Horizon 2 continued:
		
Slowly permeable layer	Not Present	
Gleying	Not present	
Wetness Class	I	
Wetness limitation	3a	
MB Wheat	63.31	
MB potatoes	35.19	
Droughtiness Limitation	1	



Sample Point No. 58					
Horizon 1	0-30cm - Dark brown (7.5Y 3/4) medium clay loam (MCL) topsoil with 10% stones (2-6cm) and a weak medium sub angular blocky structure.				
Horizon 2	30-50cm – Reddish brown (5YR 4/4) clay / heavy clay loam (C/HCL) stoneless subsoil with common ochreous and grey mottles and a coarse subangular blocky structure.				
Horizon 3	Impenetrable to further hand augering at 50cm				
Pictures					
Horizon 1	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%; text-align: center;">Horizon 2</td> <td style="width: 66%; text-align: center;">Horizon 3</td> </tr> <tr> <td style="text-align: center;"></td> <td style="text-align: center;"></td> </tr> </table>	Horizon 2	Horizon 3		
Horizon 2	Horizon 3				
					
Horizon 1					
Slowly permeable layer	Not Present				
Gleying	Not present				
Wetness Class	I				
Wetness limitation	3a				
MB Wheat	44.41				
MB potatoes	35.19				
Droughtiness Limitation	1				

**ANALYTICAL REPORT**

<b>Report Number</b>	<b>67420-23</b>	<b>W250</b>	<b>AMET PROPERTY</b>
<b>Date Received</b>	<b>14-APR-2023</b>		<b>HENWICK BARN</b>
<b>Date Reported</b>	<b>27-APR-2023</b>		<b>BULWICK</b>
<b>Project</b>	<b>SOIL</b>		<b>CORBY</b>
<b>Reference</b>	<b>AMET PROPERTY</b>		<b>NORTHANTS</b>
<b>Order Number</b>			<b>NN17 3DU</b>

Laboratory Reference		SOIL624350	SOIL624351	SOIL624352	SOIL624353	SOIL624354	SOIL624355			
Sample Reference		ALLES 10 TS	ALLES 10 SS1	ALLES 58 TS	ALLES 58 SS1	ALLES 86 TS	ALLES 86 SS1			
Determinand	Unit	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL			
Coarse Sand 2.00-0.63mm	% w/w	8	6	7	2	14	34			
Medium Sand 0.63-0.212mm	% w/w	6	5	9	4	12	10			
Fine Sand 0.212-0.063mm	% w/w	14	10	16	17	7	7			
Silt 0.063-0.002mm	% w/w	41	39	43	42	39	33			
Clay <0.002mm	% w/w	31	40	25	35	28	16			
Textural Class **		HCL	C	MCL	C/HCL	HCL	cSL			

**Notes**

Analysis Notes	The sample submitted was of adequate size to complete all analysis requested. The results as reported relate only to the item(s) submitted for testing. The results are presented on a dry matter basis unless otherwise stipulated.
Document Control	<b>This test report shall not be reproduced, except in full, without the written approval of the laboratory.</b>

Reported by	<p>** Please see the attached document for the definition of textural classes.</p> <p><i><b>Daniel Petty</b></i></p> <p>Natural Resource Management, a trading division of Cawood Scientific Ltd. Coopers Bridge, Braziers Lane, Bracknell, Berkshire, RG42 6NS Tel: 01344 886338 Fax: 01344 890972 email: enquiries@nrm.uk.com</p>
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## ADAS (UK) Textural Class Abbreviations

The texture classes are denoted by the following abbreviations:

<b>Class</b>	<b>Code</b>
Sand	S
Loamy sand	LS
Sandy loam	SL
Sandy Silt loam	SZL
Silt loam	ZL
Sandy clay loam	SCL
Clay loam	CL
Silt clay loam	ZCL
Clay	C
Silty clay	ZC
Sandy clay	SC

For the *sand*, *loamy sand*, *sandy loam* and *sandy silt loam* classes the predominant size of sand fraction may be indicated by the use of prefixes, thus:

vf	Very Fine (more than 2/3's of sand less than 0.106 mm)
f	Fine (more than 2/3's of sand less than 0.212 mm)
c	Coarse (more than 1/3 of sand greater than 0.6 mm)
m	Medium (less than 2/3's fine sand and less than 1/3 coarse sand).

The subdivisions of *clay loam* and *silty clay loam* classes according to clay content are indicated as follows:

M	medium (less than 27% clay)
H	heavy (27-35% clay)

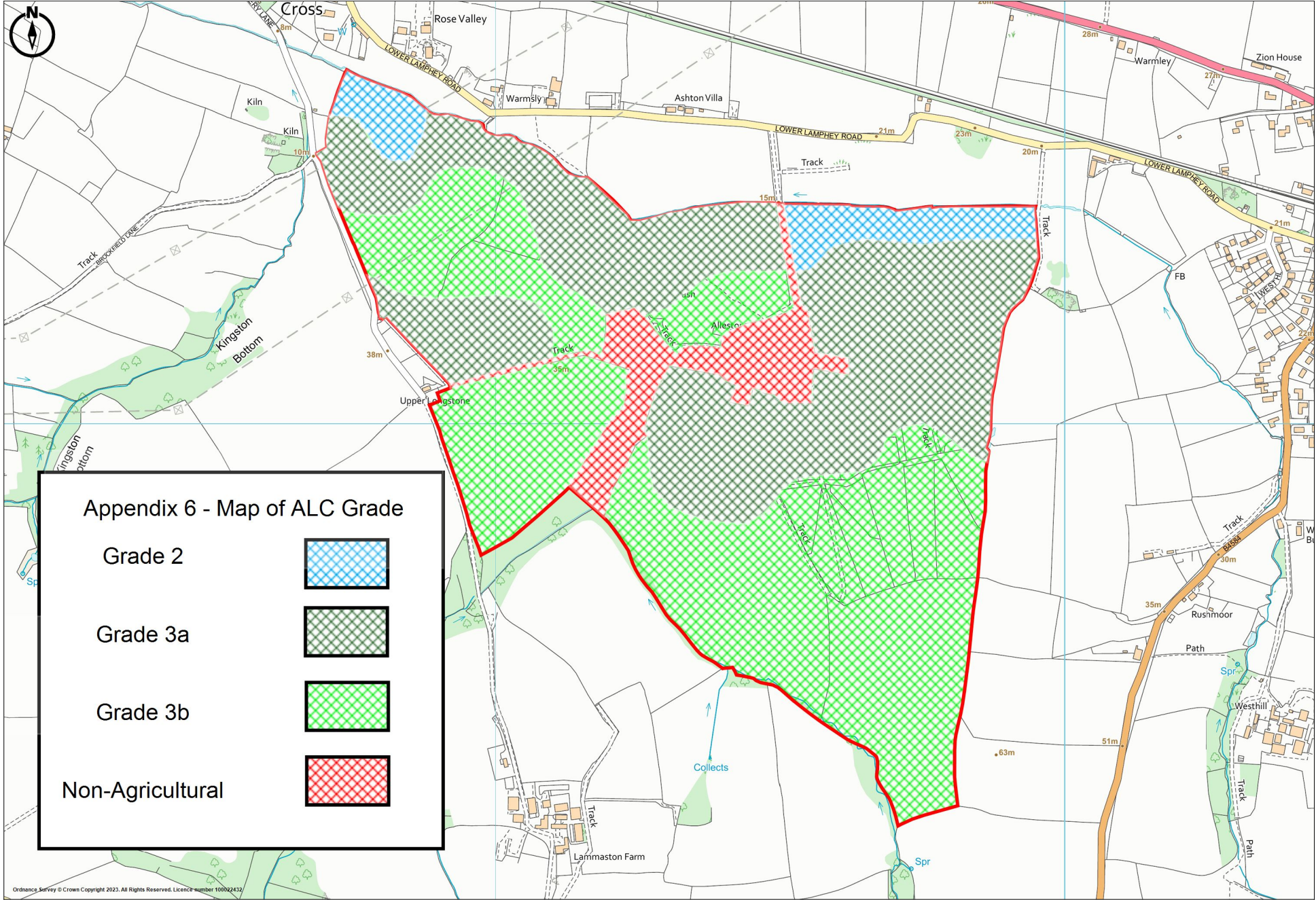
Organic soils i.e. those with an organic matter greater than 10% will be preceded with a letter O.

Peaty soils i.e. those with an organic matter greater than 20% will be preceded with a letter P.



## APPENDIX 5 - DESCRIPTION OF ALC GRADES

- Grade 1 - excellent quality agricultural land Land with no or very minor limitations to agricultural use. A very wide range of agricultural and horticultural crops can be grown and commonly includes top fruit, soft fruit, salad crops and winter harvested vegetables. Yields are high and less variable than on land of lower quality.
- Grade 2 - very good quality agricultural land Land with minor limitations which affect crop yield, cultivations or harvesting. A wide range of agricultural and horticultural crops can usually be grown but on some land in the grade there may be reduced flexibility due to difficulties with the production of the more demanding crops such as winter harvested vegetables and arable root crops. The level of yield is generally high but may be lower or more variable than Grade 1.
- Grade 3 - good to moderate quality agricultural land Land with moderate limitations which affect the choice of crops, timing and type of cultivation, harvesting or the level of yield. Where more demanding crops are grown yields are generally lower or more variable than on land in Grades 1 and 2.
- Subgrade 3a - good quality agricultural land Land capable of consistently producing moderate to high yields of a narrow range of arable crops, especially cereals, or moderate yields of a wide range of crops including cereals, grass, oilseed rape, potatoes, sugar beet and the less demanding horticultural crops.
- Subgrade 3b - moderate quality agricultural land Land capable of producing moderate yields of a narrow range of crops, principally cereals and grass or lower yields of a wider range of crops or high yields of grass which can be grazed or harvested over most of the year.
- Grade 4 - poor quality agricultural land Land with severe limitations which significantly restrict the range of crops and/or level of yields. It is mainly suited to grass with occasional arable crops (e.g. cereals and forage crops) the yields of which are variable. In moist climates, yields of grass may be moderate to high but there may be difficulties in utilisation. The grade also includes very droughty arable land.
- Grade 5 - very poor-quality agricultural land Land with very severe limitations which restrict use to permanent pasture or rough grazing, except for occasional pioneer forage crops.



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Pembrokeshire County Council  
County Hall  
Haverfordwest  
Pembrokeshire  
SA61 1TP

**Eich cyf / Your ref** CAS-03072-D7X6N7

**Ein cyf / Our ref** 23/SW-6109

21 December 2023

Dear Sir/Madam,

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES)  
ORDER 2012:**

**Alleston Solar Farm Alleston Farm, Pembrokeshire**

**Ground mounted photovoltaic solar farm with a capacity of up to 49 MW together with  
associated equipment, infrastructure and ancillary works**

I refer to your consultation of 16/11/2023 regarding the above planning application and advise that the Welsh Government as highway authority for the A477 trunk road does not wish to comment further on this application.

If you have any further queries, please forward to the following Welsh Government Mailbox  
[Lgc\\_development\\_control-south@gov.wales](mailto:Lgc_development_control-south@gov.wales)

Yours faithfully,

Helen Lewis



**From:** C [REDACTED] <[REDACTED]>  
**Sent:** Friday, November 24, 2023 5:59 PM  
**To:** PEDW – Seilwaith / Infrastructure <PEDW.Infrastructure@gov.wales>  
**Cc:** Pang, Chris (CCRA - Planning) [REDACTED]  
**Subject:** 20231124\_MINISTRY\_OF\_DEFENCE\_Safeguarding\_Response\_DNS CAS-03072-D7X6N7

Good afternoon,

Thank you for consulting the Ministry of Defence (MOD) on the scoping direction for reference DNS CAS-03072-D7X6N7

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

I can confirm that, following review of the application documents, the proposed development falls outside of MOD safeguarded areas and does not affect other defence interests. The MOD, therefore, has no objection to the development proposed.

Kind Regards

**Chris Waldron**  
Assistant Safeguarding Manager  
**St George's House | Defence Infrastructure Organisation Head Office |**  
**DMS Whittington | Lichfield | Staffordshire | WS14 9PY**

Skype: [REDACTED]

Mob: [REDACTED]

Email [REDACTED]



Website: [www.gov.uk/dio/](http://www.gov.uk/dio/)

Twitter: @mod\_dio

Read DIO's blog <http://insidedio.blog.gov.uk/>



PCAC PEDW  
Crown Buildings,  
Cathays Park,  
Cardiff,  
CF10 3NQ

**Date: 30/11/2023**  
**Our Ref: PPA0008422**

Dear PCAC PEDW

**Grid Ref: 200399 200083**

**Site Address: Alleston Solar Farm, Pembrokeshire,**

**Development: DNS CAS-03072-D7X6N7 - 2D - Ground mounted photovoltaic solar farm with a capacity of up to 49 MW together with associated equipment, infrastructure and ancillary works.**

I refer to your consultation documents received in accordance with Scoping Direction in relation to in regulation 13(6) and Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended) ['the 2017 Regulations'], in addition to Welsh Office Circular 11/99 for the development Ground mounted photovoltaic solar farm with a capacity of up to 49 MW together with associated equipment, infrastructure and ancillary works.

We welcome the opportunity to comment on the proposal and would offer the following standing advice which should be taken into account within any future application:

### **SEWERAGE / SEWAGE TREATMENT**

It appears the application does not propose to connect to the public sewer, and therefore Dwr Cymru Welsh Water has no further comments.

However, should circumstances change and a connection to the public sewerage system/public sewage treatment works is preferred we must be re-consulted on this application.

The applicant is also advised that some public sewers and lateral drains may not be recorded on our maps of public sewers because they were originally privately owned and were transferred into public ownership by nature of the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011. The presence of such assets may affect the proposal. In order to assist us in dealing with the proposal the applicant may contact Dwr Cymru Welsh Water on 0800 085 3968 to establish the location and status of the apparatus. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

## **WATER SUPPLY**

We acknowledge a water supply for this proposed development will not be required. However, should circumstances change, please contact our Developer Services Team on 0800 917 2652.

I trust the above information is helpful and will assist you in forming water and drainage strategies that should accompany any future planning application. I also attach copies of our water and sewer extract plans for the area, and a copy of our Planning Guidance Note which provides further information on our approach to the planning process, making connections to our systems and ensuring any existing public assets or infrastructure located within new development sites are protected.

Please note that our response is based on the information provided in your enquiry and should the information change we reserve the right to make a new representation. Should you have any queries or wish to discuss any aspect of our response please do not hesitate to contact our dedicated team of planning officers, either on 0800 917 2652 or via email at [developer.services@dwrcymru.com](mailto:developer.services@dwrcymru.com)

Please quote our reference number in all communications and correspondence.

Yours faithfully,



**Owain George**  
**Planning Liaison Manager**  
**Developer Services**

***Please Note that demands upon the water and sewerage systems change continually; consequently the information given above should be regarded as reliable for a maximum period of 12 months from the date of this letter.***

# Planning and new development

What you should do, and how we can help





Whether you're a homeowner with plans to extend your home, a builder working on a new house or a developer working on a new housing site, you need to involve us in the planning process. Even if you are just thinking about building, getting us involved early can help your project run smoothly and address any water and drainage matters as early as possible in the development process.

### How can we help?

As water and waste services are at the forefront of public health and protection of the environment, we play a key part in the town and country planning process.

If you're planning on building new houses, our team of dedicated planning officers can give you advice and guidance at all stages of the process, including pre-application, planning application and discharge of condition.

When it comes to your new development, by getting us involved in the planning stages, we can:

- Assess whether the current local water and sewerage networks have capacity to service your new site (and if they can't, then identify whether the network can be reinforced to support your new site)
- Mitigate any potential negative impact that the new development could have on the performance of our infrastructure, the service we provide to customers, and the wider environment
- Identify where new development and growth is planned so that we can target investment in our existing infrastructure within these areas
- Provide advice on making new water and waste connections to our networks once your development is complete and ready to be occupied
- Identify any existing water or waste pipes in or near to the site, so we can advise on their location and let you know your options for protecting and/or diverting our assets for the lifetime of the development







## Step 1: Use our pre-planning service

### What is our pre-planning service?

We encourage all developers to engage with us as early as possible to ensure any water and drainage matters that might arise during the planning process are identified and addressed early on. In order to facilitate this, you can engage with us via our dedicated pre-planning service, which will provide:

- An assessment of the impact of your proposed development and whether our local water and waste networks can support it
- Confirmation of whether off-site water mains and/or sewers will need to be provided, and
- Water main and sewer plans indicating the location of our assets crossing the site or located in close proximity. *Please note that these are for general guidance only and all assets need to be accurately located on site before any excavation works begin.*

### How can I access it?

You can submit a 'pre-planning advice' application online via our website. To make sure that we can provide you with the most comprehensive advice, you should include the following information:

- Site location plan
- Details of the proposed development
- Proposed points of communication to our local network of sewers and/or water mains (if known)
- Relevant planning history relating to the site e.g. any previous permissions granted or status within the council's development plan

You can see how much this service will cost on our website, and we'll aim to get back to you with a written **response within 21 days** of your application. The advice provided will be valid for 12 months and help inform our response when consulted on your planning application by the local planning authority (LPA).

### For larger developments in Wales:

- You have to undertake pre-application consultation as set out in Schedule 4 of the Town & Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 for any developments that:
  - Include 10 dwellings or larger
  - Have 1000sqm or larger non-residential floor space or
  - Have a site area that's 1 hectare or larger
- This means you need to consult with us and we will **respond within 28 days**.
- While there's no charge for this service, as it's a statutory requirement, we do recommend that you apply for our pre-planning service in advance of this consultation, as it will help to identify any potential issues that need to be addressed in advance of your planning application.





## Step 2: Once you have our pre-planning advice



### Locate our assets

Before you build, it's important to identify if any of our pipes, water mains or sewers are underneath the ground in or adjacent to your development site. Under section 159 of the Water Industry Act 1991, we have the rights of access to inspect, maintain, adjust, repair or alter any asset or apparatus at all times.

#### If your land does contain assets

If your land does indeed contain some of our assets, then this will have an impact on the layout and general arrangement of the new development site. We strongly recommend that you contact us to discuss accurately locating our assets to ensure that they are protected during and after construction. Please contact our Plan and Protect team via [planandprotect@dwrcymru.com](mailto:planandprotect@dwrcymru.com) or 08009172652 to discuss further.

#### If you want to divert or remove the assets contained in your land

If you decide the asset located within or adjacent to your site can't be incorporated within the layout of the new development, or our rights of access to the asset may be hindered by your proposal, you can ask us to alter, divert or remove it in accordance with section 185 of the Water Industry Act 1991. You can find the application forms on our website.

### How will you manage surface water?

As with all new development sites, you'll need to think about how to deal with surface water runoff from any new buildings and hard standings. Legislation in both England and Wales now actively encourages the use of sustainable urban drainage systems (SUDS). This approach manages surface water runoff by imitating natural drainage systems and retaining water on or near the site.

There are such a variety of SUDS techniques including green roofs, rainwater harvesting and permeable pavements that any development should be able to include a SUDS scheme. There would need to be good justification not to incorporate a SUDS scheme on your site.

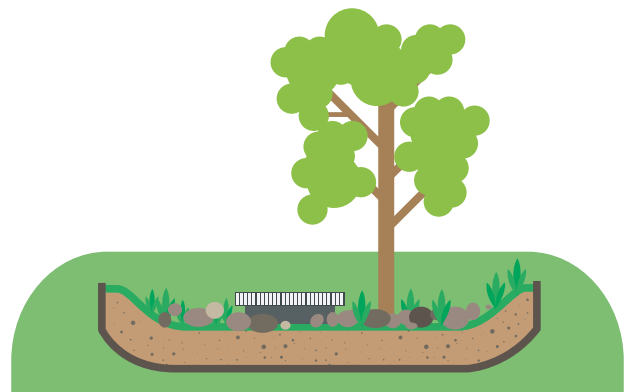
### SUDS in Wales

All new development of more than one building or a construction area of 100m<sup>2</sup> or more will require consent from the sustainable drainage system (SUDS) approval body (also known as a SAB) for any new SUDS features, as required by Schedule 3 of the Flood and Water Management Act 2010. SABs are delivered by local authorities across Wales.

In accordance with this and the Welsh Government 'Statutory standards for sustainable drainage systems', you need to explore and fully exhaust all surface water drainage options, using discharge to a combined sewer only as a last resort.

### SUDS in England

Even if your new development is based in England, it's important to keep Part H of the 'Building Regulations 2000' in mind. On this basis, all new developments in England will also be expected to consider surface water management techniques and demonstrate all technical options have been explored and exhausted, in liaison with the land drainage authority and/or the Environment Agency. You need to consider the management of highway or land drainage runoff as these flows won't be allowed to discharge directly or indirectly into the public sewerage system.



### Step 3: The planning application process

Once you've used our pre-planning service and identified any potential issues before building, it's time to incorporate our advice into your proposals to your local planning authority (LPA).

As part of the planning application consultation process we will provide similar advice to that provided in our pre-application **response within 21 days**. It's important to note that while we share our expert opinion during this process, the ultimate decision to grant planning permission is the LPA's.

#### What are the options if we can't currently support your development?

##### Network hydraulic modelling/WwTW feasibility studies

As our aim is to support economic development and growth, we do not want to resist new development where possible. However, we must take the capacity of our existing assets, the service we are providing to existing customers and the environment into account. In areas where there are capacity constraints either on our networks or at the wastewater treatment works (WwTW), we may well already have proposals in place to deliver reinforcement works and to create capacity for new developments.

That being said, you may want to develop your site in advance of us undertaking these works. If this is the case, to ensure there's no detriment to our existing customers, you may be required to implement solutions identified by an assessment of either the network or WwTW. It's important to note that you won't be expected to resolve any existing operational issues.

Where further assessments are recommended, you will need to allow sufficient time in your development programme for these studies to be carried out and any reinforcement works to be delivered, as in some circumstances we won't permit a communication to our networks until these works are completed. The delivery of the works will need to align with occupation rather than construction.

Where possible, we will control the delivery of any solutions as part of the planning process. Dependent on the progress of the assessment, we may be in a position to recommend appropriate planning conditions so that the outcomes of the assessment can be delivered as part of any planning permission.

This approach allows us to support the progression of the site through the planning process, however in the absence of a completed assessment and known solutions we may need to work with you and the LPA until the assessment is completed and the outcomes are known.

### Step 4: Connecting to our network

If you've had the green light from us and planning permission has been granted for your development, then it's time to start thinking about the different ways you'll need to connect to our network.

On our website you can find detailed guidance around applying for new water connections, new water mains, new public sewers and new sewer connections.

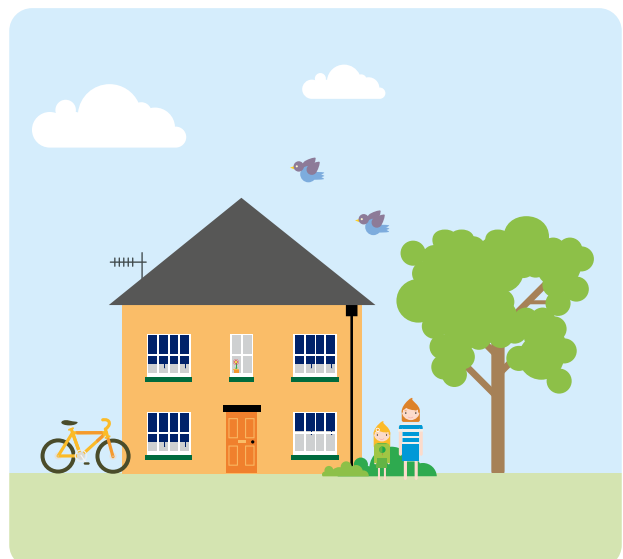
#### Contact us

If you've still got any questions or queries, then feel free to contact us:

**Email:** [developer.services@dwrwymru.com](mailto:developer.services@dwrwymru.com)

**Visit:** [www.dwrwymru.com](http://www.dwrwymru.com)

**Tel:** 0800 917 2652





## Contact Us:

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then feel free to contact us:

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@dwrcymru

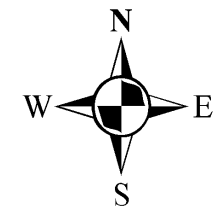


/dwrcymruwelshwater



Dŵr Cymru  
Welsh Water

PPA0008422



**LEGEND(Representative of most common features)**

**Waste network:**

- |  |                         |  |   |  |                        |  |                |  |                    |
|--|-------------------------|--|---|--|------------------------|--|----------------|--|--------------------|
|  | Foul chamber            |  | Surface water chamber                                 |  | Combined chamber       |  | Storm Overflow |  | Outfall            |
|  | Combined sewer overflow |  | Rising main   |  | Lamphole               |  | Gravity sewer  |  | Private sewer      |
|  | Special purpose chamber |  | Private sewer subject to Sect. 104 adoption agreement |  | Private Sewer Transfer |  | Lateral Drain  |  | Inspection Chamber |
|  | Treatment works         |  | Pumping station                                       |  |                        |  |                |  |                    |
- NB: Sewer symbol colour indicates the type.  
 RED - Combined  
 GREEN - Surface Water  
 BROWN - Foul  
 Purple - Former S24 sewers (for indicative purposes only)

**Notes:**

Whilst every reasonable effort has been taken to correctly record the pipe material of DCWW assets, there is a possibility that in some cases pipe material (other than Asbestos Cement or Pitch Fibre) may be found to be asbestos cement (AC) or Pitch Fibre (PF). It is therefore advisable that the possible presence of AC or PF pipes be anticipated and considered as part of any risk assessment prior to excavation

Dŵr Cymru Cylfyngedig (the Company) gives this information as to the position of its underground apparatus by way of general guidance only and on the strict understanding that it is based on the best information available and no warranty as to its correctness is relied upon in the event of excavations or other works made in the vicinity of the company's apparatus. The onus of locating apparatus before carrying out any excavations rests entirely on you. The information which is supplied by the Company, is done so in accordance with statutory requirements of sections 198 and 199 of the Water Industry Act 1991 which is based upon the best information available and, in particular, but without prejudice to the generality of the foregoing, it should be noted that the records that are available to the Company may not disclose the existence of a water main, service pipe, sewer, lateral drain or disposal main and any associated apparatus laid before 1 September 1989, or, if they do, the particulars thereof including their position underground may not be accurate. It must be understood that the furnishing of this information is entirely without prejudice to the provision of the New Roads and Street Works Act 1991 and the Company's right to be compensated for any damage to its apparatus.

Service pipes are not generally shown but their presence should be anticipated.

**EXACT LOCATIONS OF ALL APPARATUS  
TO BE DETERMINED ON SITE.**

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Printed on: 30 Nov 2023

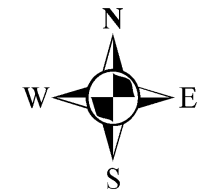
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Dŵr Cymru  
Welsh Water

PPA0008422



**LEGEND**

**Clean network:**

- |  |                         |  |                       |
|--|-------------------------|--|-----------------------|
|  | Sluice valve            |  | Stop tap              |
|  | Pressure reducing valve |  | Water Treatment Works |
|  | Meter                   |  | Water Pumping Station |
|  | Bulk meter              |  | Existing main         |
|  | Hydrant                 |  | Non-operational main  |
|  | Cap end                 |  | Raw Water             |
|  | Air valve               |  |                       |

NB: Water main symbol colour indicates the type.

- LIGHT BLUE - Trunk
- DARK BLUE - Distribution
- YELLOW - Raw Water

**Notes:**

Whilst every reasonable effort has been taken to correctly record the pipe material of DCWW assets, there is a possibility that in some cases pipe material (other than Asbestos Cement or Pitch Fibre) may be found to be asbestos cement (AC) or Pitch Fibre (PF). It is therefore advisable that the possible presence of AC or PF pipes be anticipated and considered as part of any risk assessment prior to excavation

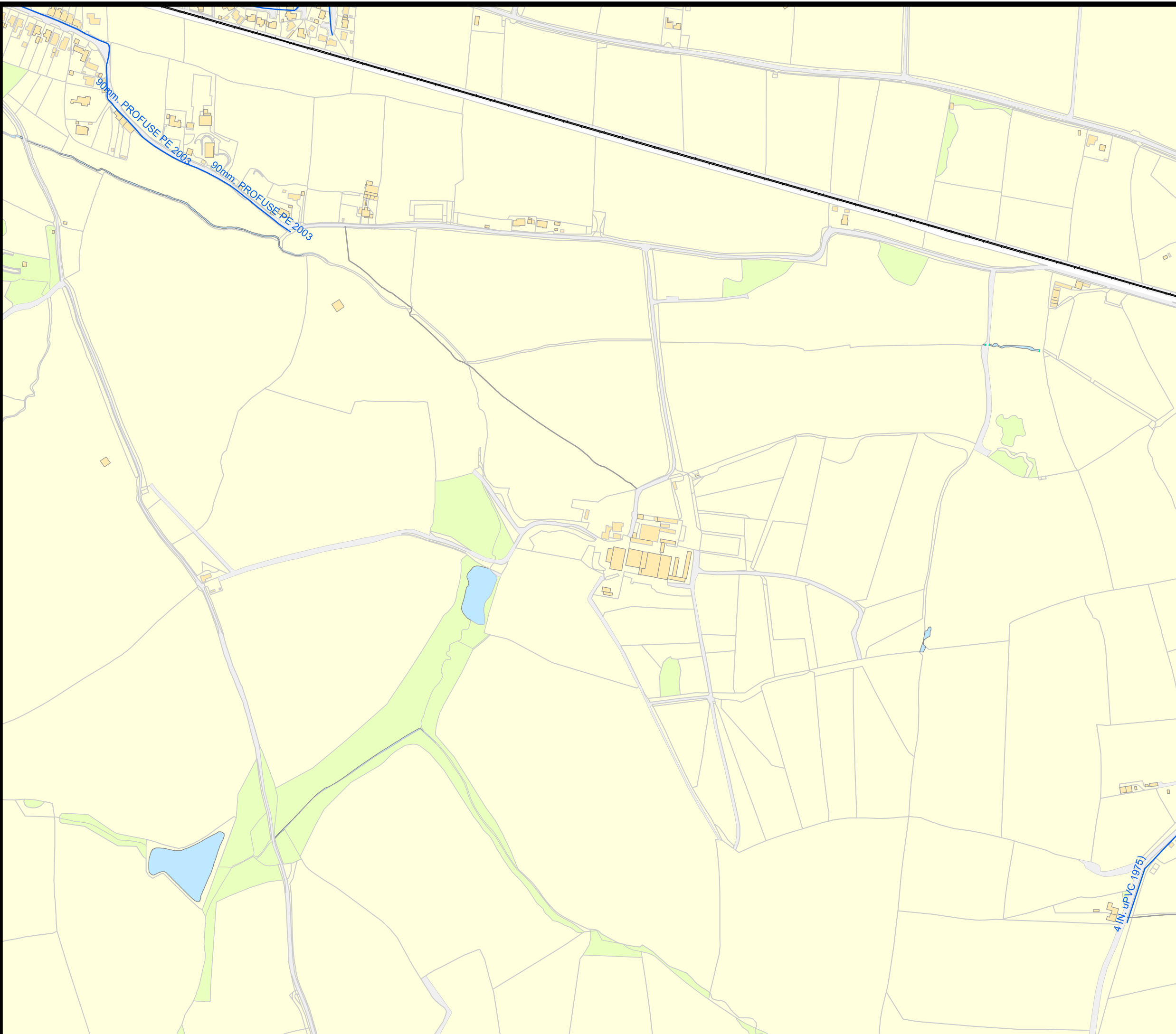
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**EXACT LOCATIONS OF ALL APPARATUS TO BE DETERMINED ON SITE.**

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Map scale: 1:4950  
Printed by: Sara Wall  
Printed on: 30 Nov 2023



**From:** Shirley Rance [REDACTED] **On Behalf Of** NSIP Applications  
**Sent:** Tuesday, November 28, 2023 11:22 AM  
**To:** PEDW – Seilwaith / Infrastructure <PEDW.Infrastructure@gov.wales>  
**Cc:** NSIP Applications <NSIP.Applications@hse.gov.uk>; HazSubConsent CEMHD5 <HazSubCon.CEMHD5@hse.gov.uk>  
**Subject:** DNS CAS-03072-D7X6N7 - Alleston Solar Farm - EIA Scoping Consultation - HSE Response 28.11.23

Dear Chris Pang,

Thank you for your email dated 16 November 2023 consulting HSE on the Proposed Alleston Solar Farm - Development of National Significance (DNS).

Please find HSE's advice below.

### **HSE's Land Use Planning Advice (CEMHD5 Contribution)**

1. With reference to the redlined *Site Boundary*, shown on plan **Alleston Solar Farm [Revision no. R2, Date 07/11/2023]** found in PDF [**Alleston Solar Farm, Pembrokeshire. Environmental Impact Assessment Scoping Report - Stantec - Figure 1.1 – Site Location Plan**], the proposed project does not fall within the consultation distances of any Major Hazard Installation(s) or Major Accident Hazard Pipeline(s).
2. Please note if at any time a new Major Accident Hazard Pipeline is introduced or existing Pipeline modified prior to the determination of a future application, then the HSE reserves the right to revise its advice.
3. Likewise, if prior to the determination of a future application, a Hazardous Substances Consent is granted for a new Major Hazard Installation or a Hazardous Substances Consent is varied for an existing Major Hazard Installation in the vicinity of the proposed development, again the HSE reserves the right to revise its advice.

### **Would Hazardous Substances Consent be needed?**

4. The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) may require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others, for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) (Wales) Regulations 2015.
5. Hazardous Substances Consent would be required if the proposed development site is intending to store or use any of the Named Hazardous Substances or Categories of

Substances and Preparations at or above the controlled quantities set out in schedule 1 of these Regulations.

6. Further information on HSC should be sought from the relevant Hazardous Substances Authority.

**Explosives sites**

There are no licensed explosive sites in the vicinity so HSE has no comment to make in this regard.

Regards  
Shirley

NSIP Consultation Team  
Health and Safety Executive





Gwasanaeth Tân ac Achub  
Canolbarth a Gorllewin Cymru

Mid and West Wales  
Fire and Rescue Service

Prif Swyddog Tân | Chief Fire Officer

**Roger Thomas** BA(Hons), MSc

tancgc.gov.uk  
mawwfire.gov.uk

PEDW  
Crown Buildings  
Cathays Park  
Cardiff  
CF10 3NQ

**FAO: Chris Pang**

*Gofynner am/  
Please ask for:*

*Rhif Est/Extn.  
No.*

*E-bost/E-mail:*

*Fy Nghyf/My  
Ref:*

*Dyddiad/Date:*

Watch Manager A. Hall

██████████  
bregs@mawwfire.gov.uk

AJH/KDT/00348819

16 November 2023

Dear Sir,

**THE TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)  
(WALES) ORDER 2012**

**THE DEVELOPMENTS OF NATIONAL SIGNIFICANCE (PROCEDURE) (WALES) ORDER 2016**

**DEVELOPMENT PROCEDURE (CONSULTEES) (WALES) (MISCELLANEOUS AMANDMENTS)  
ORDER 2021 – FIRE AND RESCUE AUTHORITIES**

**RE: Ground Mounted Photovoltaic Solar Farm with a Capacity of up to 49 MW Together with  
Associated Equipment, Infrastructure and Ancillary Works at Alleston Farm,  
Pembrokeshire**

**REFERENCE NUMBER: DNS CAS-03072-D7X6N7**

I acknowledge receipt of the notification to the Mid and West Wales Fire and Rescue Authority in relation to the above application.

The site plan/s of the above proposal has been examined and the Fire and Rescue Authority would wish the following comments to be brought to the attention of the planning committee/applicant. It is important that these matters are dealt with early on in any proposed development:

- The Fire Authority has no comment to make on access for fire appliances or water supplies.
- the Fire Authority has no objection to the proposed development and refers the Local Planning Authority to any current standing advice by the Fire Authority about the consultation.

The developer should consider the need to provide adequate water supplies and vehicle access for firefighting purposes on the site and general guidance on this matter is given in the attached Appendix and the following links: <https://www.water.org.uk/guidance/national-guidance-document-on-the-provision-of-water-for-firefighting-3rd-edition-jan-2007/>

Y Pencadlys, Heol Llwyn Pisgwydd, Caerfyrddin, Sir Gâr, SA31 1SP  
Headquarters, Lime Grove Avenue, Carmarthen, Carmarthenshire, SA31 1SP

post@tancgc.gov.uk  
mail@mawwfire.gov.uk

**0370 60 60 699**

<https://www.ukfrs.com/index.php/promos/16847>

Furthermore, the applicant should be advised to contact the Local Authority Building Control Department, which is the responsible authority, when determining issues concerning means of warning and escape, internal fire spread (linings and structure), external fire spread, access and facilities for the Fire and Rescue Service, in accordance with the 2007 version of Approved Document B (Wales).

The plan/s has been retained for record purposes.

Yours faithfully



Watch Manager A Hall  
Authorised Fire Safety Regulator  
On behalf of the Mid and West Wales Fire and Rescue Authority

Enc

## MID AND WEST WALES FIRE AND RESCUE SERVICE

### Advice on Water Supplies

#### 1. WATER SUPPLIES FOR FIREFIGHTING

The existing output of the statutory water supply network may need to be upgraded in certain parts of the local plan area to care for firefighting needs of new developments. It is recommended that this provision be a condition of planning consent.

Reference to the National Guidance Document on the Provision of Water for Fire Fighting 2007.

#### ***Access to Open Water Supplies***

Where development of water-front sites takes place, the need for permanent and unobstructed access for firefighting appliances to the water should be made a condition of any planning consent.

Consultation must take place with the Fire and Rescue Authority during the earliest planning stages of any development to ensure access for fire pumping appliances is satisfactory.

#### 1.1. HOUSING

Minimum main size 100 millimetres. Housing developments of units of detached or semi-detached houses of not more than two floors should have a water supply capable of delivering a minimum of eight litres per second through any hydrant on the development.

The Fire and Rescue Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements.

#### 1.2. TRANSPORTATION

##### ***Lorry/Coach Parks - Multi-Storey Car Parks-Service Stations***

Minimum main size 100 millimetres. All of these amenities should have a water supply capable of delivering a minimum of 25 litres per second through any hydrant on the development or within a vehicular distance of 90 metres from the complex.

#### 1.3. INDUSTRY

In order that an adequate supply of water is available for use by the Fire and Rescue Authority in case of fire, it is recommended that the water supply infrastructure to any commercial industrial estate is as follows:

##### ***Light Industrial/Commercial***

Up to one hectare, 20 litres per second - Minimum Main Size 100 millimetres

Up to two hectares, 35 litres per second - Minimum Main Size 150 millimetres

### ***High Risk Industrial***

Up to three hectares 50 litres per second - Minimum Main Size 150 millimetres

Over three hectares, 75 litres per second - Minimum Main Size 150 millimetres

In rural areas it may not be possible to provide sufficient mains water. To overcome this, static or river supplies would be considered on site if they are capable of supplying the above flow rates for at least one hour.

The Fire and Rescue Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements, as high-risk premises may require a greater flow.

#### **1.4. SHOPPING, OFFICES, RECREATION AND TOURISM**

Commercial developments of this type should have a water supply capable of delivering a minimum of 20 to 75 litres per second to the development site. The Fire and Rescue Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements.

#### **1.5. EDUCATION, HEALTH AND COMMUNITY FACILITIES**

##### ***Village Halls***

Should have a water supply capable of delivering a minimum of 15 litres per second through any hydrant on the development or within a vehicular distance of 100 metres from the complex.

##### ***Primary Schools and Single Storey Health Centres***

Should have a water supply capable of delivering a minimum of 20 litres per second through any hydrant on the development or within a vehicular distance of 70 metres from the complex.

##### ***Secondary Schools, Colleges, Large Health and Community Facilities***

Should have a water supply capable of delivering a minimum of 35 litres per second through any hydrant on the development or within a vehicular distance of 70 metres from the complex.

## **1.6. DISTANCES BETWEEN FIRE HYDRANTS**

The distance between fire hydrants should not exceed the following:

Residential areas	-	200 metres
Industrial Estates	-	150 metres
Town Centre Areas	-	90 metres
Commercial (Offices & Shops)	-	100 metres
Residential Hostels	-	Adjacent to access
Hotels	-	Adjacent to access
Institutional (Hospitals & Old Persons Home)	-	Adjacent to access
Old Persons Home	-	Adjacent to access
Educational (Schools & Colleges)	-	Adjacent to access

## **1.7. CONCLUSION**

Developers should hold joint discussions with the relevant Water Authority or the Environmental Agency and the Fire and Rescue Authority to ensure that adequate water supplies are available in case of fire.

The Fire and Rescue Authority reserve the right to ask for static water supplies for firefighting on site, as a condition of planning consent, if the supply infrastructure is inadequate for any given risk.