MINUTES OF THE MEETING HELD ON MONDAY 19 OCTOBER 2026

IN THE VILLAGE HALL, FREYSTROP AT 19:00

1. Opening Remarks

- The Chair welcomed everyone to the meeting. The meeting commenced at 19:00.

2. Attendance & Apologies

- Please refer to the attendance register. No apologies were received.

3. FCC Policy on Declarations of Interest

- The Chair invited declarations of interest. None were declared.

4. Minutes of the 14 September 2026 Monthly Meeting

- The minutes of the meeting held on 14 September 2026 were considered and approved without amendment as a true representation of the meeting.
  - Proposed: Cllr Anna Simpson. Seconded: Cllr David Thomas.

5. Matters Arising

- Cllr Thomas reported that the area around the defibrillator had been painted and marked off to keep it accessible. T Holder had become an assistant holder of responsibility.
- The Chair confirmed that there were no other matters arising to be raised under this item. Matters already listed elsewhere on the agenda are recorded under the relevant headings below.

6. Presentations & Questions from the Public

- No public questions had been submitted in advance. A member of the public advised they had a question to raise under a later agenda item. The Chair confirmed that questions could be raised at the relevant point and that the Council was happy to hear them.
- A member of the public observed that the wording at the top of the agenda appeared to say that members of the public could not participate. The Clerk was asked to check the wording against the Council's Standing Orders and ensure that the public-access information was accurate.

7. County Councillor's Report

- County Councillor Michael John presented his report and provided updates on the following matters:

  - **Street Lighting Policy:** A new policy had been agreed following consideration by Full Council of concerns previously raised by members.
  - **Enhancing Pembrokeshire Grant:** The 2026–2027 funding round was open for expressions of interest from 1 to 30 October 2026, with grants of up to £15,000 available to support community projects.
  - **Withyhedge Landfill:** Pembrokeshire County Council had expressed disappointment at Natural Resources Wales' decision to approve RML's permit variation application. The Council would continue engaging with NRW and the site operator regarding compliance with permit conditions and environmental standards.
  - **Waste and Recycling Centres:** The Cabinet had approved plans to introduce an Automatic Number Plate Recognition (ANPR) resident registration system across the six waste and recycling centres, with the removal of booking requirements to follow in phases. Members also discussed changes affecting the Winsel facility, including its planned closure and relocation arrangements. Further information regarding the timescale was awaited.
  - **Pembrokeshire Local Development Plan (LDP) 2:** The independent examination would include public hearing sessions in November and December 2026. The sessions would be held virtually and would be open to members of the public to observe.

- **Choice Homes @ Pembrokeshire:** The introduction of the revised housing allocation policy had been delayed following updated Welsh Government guidance. The Housing Register was due to reopen on 28 October 2026 under the existing policy.
- Other updates: County Councillor Michael John's report also included information about a prospective County Councillor event ahead of the May 2027 local elections, the new Haverfordwest Public Transport Interchange, the Pembrokeshire Spotlight Awards 2026 and the deadline for secondary school applications for September 2027.

◦ Several councillors discussed Pembrokeshire's recycling performance and the licensing and extension of the relevant arrangements. A member of the public asked whether one of the waste facilities in Pembrokeshire was due to close. Cllr John advised that the Winsel facility was not expected to be converted to an ANPR arrangement because the plan was to close it and move the facility to the Puma site. No timescale was available.

◦ Cllr Thomas asked whether soft plastics would become recyclable. Cllr John advised that this was expected to be introduced through a new waste bag. The Chair asked whether this would include materials such as cling film; Cllr John confirmed that kerbside recycling of such materials was intended.

8. Community

Winter Wellbeing & Preparedness Event

◦ The Council discussed the Winter Wellbeing and Preparedness event planned for Friday 6 November 2026, from 1:00pm to 3:30pm at the Village Hall. The event is intended to promote winter preparedness and support available to residents, including National Grid's Priority Services Register (PSR), energy-bill advice from Cwm Arian and support from Pembrokeshire FRAME, including scam-awareness information.

◦ The Chair confirmed that advice had been sought from One Voice Wales and that the Council had been advised that it could not share residents' personal data. The Council therefore noted that any promotion or support relating to the PSR must not involve sharing residents' personal information without an appropriate lawful basis and suitable arrangements.

◦ Cllr John had ideas for other people or organisations who might be able to contribute to the event and would send the relevant contact details to the Clerk.

▪ Action: Cllr John to send the Clerk the suggested contact details. The Clerk to continue coordinating event information and publicity as appropriate.

Community Information and Consultations

◦ The Pembrokeshire Coast National Park walking and hiking groups survey and the Pembrokeshire Spotlight Awards 2026 were noted. Nominations for the Spotlight Awards close on 23 November 2026.

◦ The Clerk was asked to circulate the relevant form for the Council's consideration or completion.

▪ Action: Clerk to circulate the relevant form and information.

9. Highways & Rights of Way

DKAN Roadside Hedge Removal and Associated Roadworks

◦ Cllr Thomas recalled that an earlier planning application appeared to indicate that foul sewage would connect to the public sewer system. He queried whether the roadworks might relate to a gravity sewer, based on the size of the trench, and whether the hedge removal was covered by planning permission.

◦ Cllr John reported that he had received several queries about the hedge removal. He had not received prior notice of the works, although he would ordinarily expect to be informed about road closures or similar works. He contacted Highways and the Head of Planning. On the afternoon of the meeting, the Head of Planning confirmed that planning consent had been granted for toilet facilities to be connected

to the sewer, with the approval predating the nutrient directive. Cllr John had reviewed the plans but could not identify anything that clearly addressed the hedge removal and had referred the matter back to the Head of Planning for clarification.

- It was reported that a Section 50 licence had been granted for the road excavation and that DKAN was licensed to undertake the work. The roadworks were therefore described as authorised. However, questions remained about the hedge removal and whether it was covered by the relevant permission, including application reference 20/0140/PA. Those points were being investigated.
- Members of the public raised concerns about the lack of advanced communication, disruption and noise close to private properties, the condition of fencing over the weekend, and the effect of the works on traffic. Concerns were also raised about children crossing or waiting near the road in the morning, reduced visibility and an incident in which an ambulance had reportedly been delayed. Members discussed whether a wall or hedge would be reinstated when the works were complete; this had not been confirmed.
- Cllr John acknowledged the concerns and advised that he had stressed that work should, where possible, take place between 9:00am and 3:00pm to reduce disruption. He noted that those undertaking the work were not obliged to notify him in advance but expressed disappointment at the lack of communication.

Bus Stop Safety at Freystrop Cross

- Cllr Esmee Utting raised concerns about schoolchildren and crossing in the morning due to visibility and safety of the location. The suggestion of moving the waiting point nearer to the shop was discussed, as the shop does not open until 10:00am however there is no pavement there.
- It was asked whether Cllr John could make a formal request to Highways to review the situation, taking account of school drop-off times and the timing and nature of the roadworks.
- Action: Cllr John to raise the bus-stop safety concerns with Highways and seek advice on appropriate measures.

Overhanging Trees on Targate Road

- The Chair reported that complaints had been received about overhanging trees on Targate Road. The Council understood that landowners were responsible for their own trees where these were outside the highway maintenance responsibility of the County Council, while FCC had responsibility for the park area.
- The Council agreed to obtain quotations to establish the cost of trimming the trees. The Chair asked whether contractors would need to hold a particular licence or qualification.
- Action: Clerk to obtain quotations for the required tree work and check whether any specific contractor licence or qualification is required.

Winter Salt Bins

- The Chair asked whether additional salt bins were required. It was confirmed that FCC did not consider any additional bins necessary at present. Members discussed who replenishes the existing bins; Cllr John believed that the County Council carried this out periodically.
- Action: Clerk to check whether the salt bins in Freystrop have been replenished and, if not, when replenishment is expected.

10. Planning Matters

White House Solar & Storage Facility — PEDW CAS-03107-C5X9W1

- The Chair reported that the Joint Working Party had prepared a response concerning the White House Solar & Storage Facility. Members discussed reviewing the draft response and confirming by email whether FCC supported its submission, with the aim of submitting it on 20 October rather than waiting until the 21 October deadline.
- A member of the public indicated that the draft response was likely to be the final version and expressed a preference for submission on 20 October. It was confirmed that members would review

the response after the meeting and confirm their agreement by email. The response would make clear FCC's position in opposition to the solar farm proposal.

- Members of the public discussed concerns about hedgerow removal, whether private landowners affected had been approached, the status of stone walls, the quality and scope of surveys, and whether relevant features had been assessed for protected status. A member of the public reported receiving a response from Qair indicating that it had not contacted private landowners because it considered the works to be within the highway. The Chair noted that the matters raised were addressed in the draft response.
- The Chair asked for confirmation of the proposed email decision process. Cllr Simpson proposed that the decision be made by email, and Cllr Jen Morris seconded the proposal. Cllr Thomas also supported it. Members were asked to review the draft response and confirm their agreement by email. The Council's representation and the accompanying Freystrop & Friends Solar Action Group response are appended as records of the submissions (Appendices 1 and 2).
- Action: Council members to review the Joint Working Party draft and confirm by email whether FCC approves submission. The Clerk to retain the approved submission with the minutes.

Pembrokeshire Local Development Plan 2 Examination

- The examination is due to start on 10 November 2026. Cllr Thomas reported receiving an email that morning indicating that in-person meetings may be available in addition to online meetings, although he was awaiting clarification of the venue. The Chair reiterated that FCC was not representing the site in the LDP process.
- Cllr John said he could follow up with the biodiversity officer if there had been no response to the Solar Farms Group's request. Members also discussed whether Pembrokeshire County Council would be responding to the solar farm application and the planning matters that could fall to the County Council if works were approved. Cllr John expressed agreement with the concerns raised.
- Action: Cllr Thomas to report back when the venue/arrangements for in-person LDP2 examination meetings are clarified. Cllr John to follow up with the biodiversity officer if required.

Shire Hill, Moorland Road — 26/0297/PA

- The planning application and its conditional approval were noted.

Other Planning Matters

- No other current planning matters were reported.

11. Assets

Freystrop Village & Playing Field Management Committee

- Cllr Morris reported that the Management Committee had met the previous Monday. Russell Lavis had resigned from the Committee, and Wendy White had agreed to assist with notetaking and preparation of agendas. The Committee had identified a need to clarify its foundational documents and locate its policies and procedures; Andrew Brown had offered to help. Volunteers were requested because there was a considerable amount of work to complete.
- Missing minutes and agendas had been identified as an issue, and the Committee intended to place these on the noticeboard outside the hall. August had been quiet for bookings, as expected, but bookings were increasing.
- The Committee had discussed the Pride in Place funding previously considered with Russell Lavis. PCC had advised that it was not confident the funding could be spent by March 2027 and could not support the proposal in its current form but suggested exploring the Enhancing Pembrokeshire Grant. Cllr John was asked about the expression-of-interest deadline, understood to be 31 October.
- Cllr Morris emphasised the need for a village plan so that future funding opportunities could be considered promptly. The Chair suggested a ten-year plan setting out projects and aspirations for the village. Jen asked whether preparing the plan could be a priority for the next financial year.

- A question was raised about Russell Lavis's role with the charity, following information that he had been appointed assistant coordinator and the report that he had stepped down from the Committee. Jen agreed to check the position. The Chair confirmed that Russell had also said he had resigned as a trustee. The Committee also needed to address banking arrangements because Russell was a signatory.
- The Chair summarised that the Committee had administrative and historical matters to resolve and that an action plan was needed. Jen emphasised that FCC and the Village Hall/Playing Field organisation must remain separate entities. The next Playing Field meeting was noted as 23 November, when a Christmas fair was also due to take place. A subcommittee was working on the business plan.

▪ Action: Village & Playing Field Management Committee to develop a plan and continue clarifying its governing documents, policies, records, banking arrangements and longer-term village plan.

Northmoor Common

- The Chair reported that he had attended a meeting concerning Northmoor Common and had discussed with Jim Dunkerley the need to clarify FCC's responsibilities following misunderstandings at the previous meeting. Jim was expected to arrange a further meeting, but neither the Chair nor a member of the public had received an update by the date of this meeting.
- A member of the public made comments concerning Northmoor Common, followed by discussion about the works carried out at the Common, when they may have taken place and whether anyone had camera footage. No one present was aware of having relevant footage, although members would ask around.
- Members of the public expressed concern about the loss of community use and funding and referred to other incidents in the village involving cut chains. The Chair asked whether the incidents had been reported to the police; the member of the public said they had not. The discussion included the importance of reporting such incidents.
- The Chair advised that the immediate next steps were to look at securing the gate and to seek clarification about funding. He asked members of the public to keep the Council informed and said FCC would speak to Jim to see whether it could help facilitate a resolution. Cllr Thomas asked whether Jim could be invited to a Council meeting; Anna confirmed that this was acceptable.

▪ Action: Clerk to invite Jim Dunkerley to a future Council meeting to provide an update. Chair to follow up on gate security, management responsibilities and funding; members of the public to provide any further relevant information.

Village Hall Broadband/Wi-Fi

- The Chair confirmed that broadband options were still being considered. He had personal experience of Starlink and considered it workable. The discussion also included the possible use of cameras and an audio system, and the need for meetings to be accessible online.
- A member of the public referred to a presentation in Crundale where microphones and speakers were being used and asked whether grant funding had been obtained. The Clerk was asked to check whether grant support might be available. No provider or expenditure commitment was made.

▪ Action: Clerk to investigate grant funding options for Village Hall meeting equipment, including microphones and speakers, and report back.

Community Orchard Proposal

- Andrew Brown introduced his proposal to explore a community orchard on Council-owned land between Targate Road and Moorland Road. He understood the field to be Category 4 land and said an orchard could provide a community benefit and social function. Members considered the suggestion in the context of the intention for the land to pass to the community.
- Discussion highlighted the need to establish the terms of the will and the intended use of the land before deciding what FCC could or should do. A member of the public stated that the land had been left for the maintenance of a children's play area. It was also noted that FCC may have access to only part of the site, and questions were raised about the trustees and whether additional trustees were required. The Chair advised that the Council needed to understand the arrangements and promote the

land's intended use. Cllr Thomas suggested that the matter could be included in the ten-year village plan.

- The Chair confirmed that the Clerk should review the historic records and legal documents, establish the Council's powers and responsibilities. No decision was made to proceed with an orchard.
- Action: Clerk to review historic paper records and legal documents relating to the land, clarify the intended use, trusteeship and FCC's powers/responsibilities, and report back.

Big Belly Smart Bin Proposal

- The Clerk explained that the proposal had arisen from a sales email and asked whether such bins were needed in the village. Cllr Simpson did not support paying for bins. The Chair advised that the proposal would only be viable if the bins generated income, for example through an arrangement similar to paid Ink recycling.
- Cllr Morris noted that bins and recycling were due to be discussed at a future agenda item. No purchase or rental decision was made.

Noticeboards and Community Newsletter

- The Chair reminded members that FCC had a £500 One Voice Wales Cost of Living grant for noticeboards, which had to be spent by the end of February. Members discussed whether the Council should approach the three hamlets to identify suitable noticeboard locations.
- Cllr Utting raised concerns that residents were not always aware of what was happening in the village. Cllr Thomas suggested that information could be displayed in the bus shelter. The Clerk noted that the grant might be usable for other means of communication if appropriate. The Chair confirmed that the grant was available for noticeboards.
- Members of the public considered whether a newsletter would also be useful, noting that some residents would benefit from printed information. Members of the public volunteered to help with delivery. The Clerk was asked to review noticeboard costs and options for a newsletter, including format and frequency, and report at the next meeting.
- Action: Clerk to obtain/review noticeboard costs and assess newsletter options, including format, frequency and delivery, for the next meeting. Council to consider the most appropriate use of the £500 grant before the deadline.

12. Training/Seminars, Consultations & Presentations

- The Chair drew members' attention to the Pembrokeshire Coast National Park planning workshop on 2 November 2026, with responses requested by 26 October, and the other training and consultation items listed on the agenda.
- It was confirmed that the Community Boundary Review webinars were not applicable to Freystrop at present. Cllr John advised that a boundary review was not imminent for the area.

13. FCC Administration

Community Councillor Vacancy and Co-option

- The Chair advised that Andrew Brown had expressed an interest in filling the Community Councillor vacancy and asked whether the Council wished to proceed with a decision that evening. No objections were raised, and the Council agreed to co-opt Andrew Brown.

Review of OVW Model Standing Orders (2026)

- The Chair presented notes comparing the 2026 One Voice Wales model Standing Orders with FCC's current 2024 version. The Chair had marked optional provisions in red and asked members to read and review the document.
- Members were asked to consider the proposed changes before the next meeting, with the intention of signing off the 2026 Standing Orders once members were satisfied.

- Action: All members to review the marked-up 2026 Model Standing Orders before the next meeting, with adoption/sign-off to be considered then.

Draft Publication Scheme

- The Clerk explained that the Publication Scheme addressed timescales and arrangements for publishing minutes. The draft minutes from the previous meeting had been uploaded, and members of the public had commented positively on this approach. The Chair supported the process.
- The proposed approach was accepted: draft minutes would be published, and any amendments agreed at the following meeting would be made to the record and the updated version scanned and uploaded.

Policy for Managing Unreasonable, Persistent or Abusive Behaviour

- The Clerk was asked to check whether the draft policy had already been completed or adopted.
- Action: Clerk to check the status of the Unreasonable, Persistent or Abusive Behaviour policy and report/bring it forward as necessary.

Website, Domain and Email Arrangements

- The Chair and Clerk discussed the need for a replacement website because FCC does not own the current website. The new site should be bilingual, accessible and easy to navigate. Cllr Morris suggested that the Council and Village Hall should have separate websites. Options and costs remained under consideration; no commitment was made.

ICO Registration and Banking Administration

- The Clerk confirmed that the ICO registration/contact details had been completed. The Chair advised that the banking arrangements remained in progress and that the signatories were up to date.

14. FCC Financial Matters

Audit Matters

- The Clerk confirmed that no response had yet been received from Audit Wales.

OVW Cost of Living Grant

- The £500 noticeboard grant was discussed under the Assets item. The requirement to use the grant by the end of February was noted.

Budget 2027/28

- The Chair asked for the draft budget to be reviewed in light of potential costs for tree work, a website and Village Hall broadband. The Clerk was asked to amend the draft budget to reflect these items and present the revised version at the next meeting. The budget remained a draft and was not approved at this meeting.
- Action: Clerk to revise the draft 2027/28 budget to include or account for potential tree, website and broadband costs, and present it at the next meeting.

Reserves and Account Reconciliation

- The Council noted the following bank balances: current account, £6,624.45; deposit account, £12,982.61; total bank balances, £19,607.06. Interest of £13.64 was received on 8 October 2026. The following payments were made: two payments to PPS of £70.00 each on 7 October 2026, and a payment of £47.00 to the Information Commissioner on 16 October 2026, totalling £187.00. The Council had received a precept payment of £4,000 from Pembrokeshire County Council on 7 September 2026.

Banking and HSBC Updates

- The Chair advised that the banking arrangements remained in progress and that the signatories were up to date.

15. Other Matters

- No separate additional matter was recorded under this agenda heading.

16. Councillors' Requests

- Cllr Thomas raised a concern on behalf of residents of Will Meadows about access to the stream and the right of way. Residents currently must climb a substantial mound, and a more level route would provide a shorter and more accessible walk for people walking dogs or using prams.
- Cllr Thomas said that he had raised the matter with BDS during construction and had asked whether the access could be moved and made level. BDS had not agreed at that time, and PCC had subsequently approached BDS but received a refusal. As the later part of the site had not yet been started, Cllr Thomas felt there might still be an opportunity to revisit the issue. The Chair asked whether a public footpath was being blocked; it was clarified that the route in question passed through a bungalow garden.
- Cllr Thomas undertook to speak directly to residents who had recently moved into the development to gather their views and report back at the next meeting. Cllr Utting advised that she would speak to the bungalow owner and report back. It was confirmed that PCC was already aware of the issue.
- Action: Cllr Thomas to seek residents' views on access to the stream/right of way and report back at the next meeting. Cllr Utting to speak to the bungalow owner and report back.

17. Date of Next Meeting

- The next monthly meeting will be held on Monday 9 November 2026 at 19:00 in Freystrop Village Hall.
- There being no further business, the meeting closed at 21:03.

Signed: _____
(Chair)

D Jones
Clerk to Freystrop Community Council
Ebost/Email community.clerk@freystrop.wales

APPENDIX 1 — FREYSTROP COMMUNITY COUNCIL REPRESENTATION

FREYSTROP COMMUNITY COUNCIL

PLANNING & ENVIRONMENT DECISIONS WALES
Crown Building
Cathays Park
Cardiff
CF10 3NQ

20 October 2026

REF: DNS CAS-03107-C5X9W1 - GSC WHITE HOUSE FARM LIMITED

Representation of Freystrop Community Council

Relating to Application: White House Farm Solar Array, Energy Storage Facility, Ancillary Infrastructure and Landscaping, Freystrop, Pembrokeshire

Introduction and purpose

Freystrop Community Council submits this representation in respect to the responses provided by QAIR to the issues raised by PEDW.

Removal of Hedgerows and the impact on Biodiversity.

Freystrop is rich in Biodiversity. Removal of established hedges will have a devastating effect on the wildlife in these areas, disrupting wildlife corridors and destroying habitats. It would take years to re-establish these essential habitats.

'Assuming' the permission of land owners in relation to these hedges is unacceptable and correct procedures need to be adhered to prior to acceptance of QAIR responses.

Other Considerations

There are many unanswered questions that need to be addressed before consideration can be given to this flawed planning application.

No consideration has been given to the community benefit in the event that the application is agreed by PEDW.

The Applicant is over-relying on postponing matters of detail, that are important to the Community to fully understand the impact of the project, by postponing specifications

and methodologies to Planning Conditions. The Planning Conditions should set limitations and mitigation for known impacts.

By not submitting key matters of detail, such as the BESS cooling specifications, fire treatment, cable and invertors and the specification of the arrays themselves the Applicant is by-passing matters that should be considered by consultees pre-determination. The Community deserve to understand fully what the applicant proposes

The Council respectfully asks that PEDW:

Require the issues identified by the action group, and set out in Appendix A, to be properly addressed and resolved.

Conclusion

Freystrop Community Council asks that this application be determined fairly, on complete information, and with a proper and secured return to the community that would host it. We endorse the issues raised in the appended document as matters requiring resolution before a decision, and we ask that the community's expectation of a genuine local benefit be given real weight. The Community Council cannot support the application as it currently stands.

Yours faithfully,

On behalf of Freystrop Community Council

Appendix A — Freystrop & Friends Solar Action Group, *Formal Objection to the White House Farm Solar & BESS Development* (attached).

APPENDIX 2 — FREYSTROP & FRIENDS SOLAR ACTION GROUP RESPONSE

Freystrop and Friends Solar Action Group

Date: 16th October 2026

To: PEDW Planning Casework

From: Freystrop and Friends Solar Action Group

Subject: Planning application: DNS CAS-03107-C5X9W1
Land at White House Farm and Middle Hill Farm, Freystrop

Dear Sir/Madam

This response is submitted on behalf of the Freystrop & Friends Solar Action Group, representing residents of Freystrop, Lower Freystrop, and the surrounding rural community.

In summary we find the responses provided by Qair/Axis as weak and procedurally deficient. We consider that the scheme would pose unacceptable risks and have long term irreversible effects on our rural locality. There are several aspects in which detail is unknown due to the use of the Rochdale Envelope precedent, relying on post permission arrangements made by contractors.

The Inspector is respectfully urged to refuse the application. Please see below our responses to his letter to the applicant of 24 July 2026.

Failure to consult

PEDW failed to notify several residents, who would be directly affected by the proposed development, of the second consultation period and the five-week deadline of October 21st for responses. A number of complaints have been made about this including from: the residents themselves, Jonty Colchester Chair of CPRW, PCC Head of Planning Harriet Lavender, County Councillor Michael John, Paul Marr MS, Freystrop Community Council Chair Chris White.

We are disappointed that you state in your replies to complainants that, although you are aware that some individuals who previously submitted representations have not received a copy of the examination notice, you refuse to extend the consultation period to allow 'all parties' a fair and reasonable opportunity to consider the examination notice and submit any necessary response.

We consider this to be an unsatisfactory response that does not follow the correct procedures laid out in your DNS Procedural Guidelines which require a notice period of “no less than 5 weeks” for responses to be submitted.

Question 1: Carbon balance

Solar energy reduces our need for fossil fuels but unless the land on which they sit is managed properly, it can have a negative effect on the carbon balance. It cannot be assumed that the reduction in fossil fuel use by solar definitely outweighs the detrimental effects on the land.

The report assumes that this development will displace carbon-intensive fossil fuel generation at a flat rate for 40 years. However, as UK and Welsh electricity grids rapidly decarbonise, the volume of carbon this project offsets will drop every year, making the true carbon payback period significantly longer than the 5 – 13 years stated in the report.

The Fichtner carbon balance report cannot arrive at a final accurate balance given the fact that the developer does not actually know what equipment regarding cooling/fire protection will be used at the proposed development. We suggest there needs to be a more detailed assessment before a definitive conclusion can be made.

In addition, it seems very convenient that the proposed land in question has very recently and very unexpectedly been significantly downgraded from ALC 3A to 5. The methodology used and timing of the soil regrading tests are extremely questionable and the number of sample pits dug makes the whole regrading process a nonsense from a statistical sample size prospective. There is clearly not enough empirical data from these tests to ensure that they are truly representative of the land in question.

The carbon balance issue also links into the size of the proposed non-contiguous two-site development i.e. there are two sites both from the carbon balance perspective and the commercial viability of the proposed development.

Question 2: Ditch reproofing

Question 3: Downstream effects of bridge installation

The proposed works will destroy localised eco systems, burrows and bank side vegetation that supports birds, amphibians and fish. Any spoil or run-off will present a hazard to local eco-systems and become toxic waste. See later comments with regard to the need for up-to-date wildlife surveys

Question 4: Water vole surveys

Whilst the applicant accepts that the water vole assessment was carried out at the wrong time of the year, they have not commissioned a new survey between the recommended months of April to September. The statement that the habitat is

'unfavourable' cannot be evidenced. Conversely, we consider that parts of Freystrop would be suitable habitat due to:

- Proximity to the Western Cleddau & Hook Wood: The low-lying terrain and local valley streams feeding towards the Western Cleddau river basin offer exactly the kind of slow-moving freshwater conditions that water voles prefer.
- Marshy Common Land: Areas like Northmoor Common feature pockets of waterlogged ground, small drainage ditches, and wet pastures. These localized wetlands provide the soft, earth-heavy banks needed for digging deep burrow networks.
- Lush Cover: Many of the small boundary streams and rural drainage ditches around the village maintain dense, uncut bankside vegetation, offering both a staple food source and crucial protection from predators.

A Freystrop resident, Sarah Dernison of Brynheulog, has encountered a water vole in her property. She says,

“I had a watervole on my property in Spring 2025. Unfortunately my cat brought it into the house but it was alive and unharmed. We thought it looked very different to usual rodents we have seen so we looked it up and from the picture comparisons we were certain that it was a watervole.”

Questions 5&6: Landscape and Visual and Cumulative effects.
We do not consider that the Landscape Technical Note provided by the applicant adequately addresses the Inspector’s questions.

The applicant was invited to include additional viewpoints with other solar developments but has declined to do so. The viewpoints that they have already provided have been selectively chosen from points where topography and hedgerows naturally screen the site. This represents a failure by the applicant to provide a true representation of the cumulative effects.

The Technical Note dismisses local views as of ‘low value’ and ‘low susceptibility’. The assertion that the effect on residents would be ‘small or negligible’ and ‘substantially filtered by mature garden and boundary vegetation’ is an incorrect assessment and must be considered alongside the fact that Qair’s original application states that tree and hedge planting will take 10 years of growth before it has a screening effect on the visibility of the solar arrays.

Some 18 properties along Moorland Road will have a direct view of the Eastern Array. A further three will have a clear line of sight to the Western Array, as shown clearly in the image below taken October 2026 from the bridle path at Targate corner, where the fields currently being used for silage are proposed to be used for solar arrays:



Some properties are not even mentioned in the Technical Note, for example at 3.1.26.1 it fails to mention Windy Hill or Garlandstone, both of which would have a direct and significant view of the Eastern Array fields.

The Landscape Technical Note is unchanged in that it makes unrealistic and simplistic assumptions, which trivialise the impact that a major development of this size would have on a rural village community. For example: it insists that people playing sport in the recreation field, riding a horse on the bridleway, or driving a car from the main road will experience a 'very low impact' because they are too occupied with concentrating on other activities. We find this assertion both ridiculous and dismissive, showing little concern for the residents who will be affected.

The applicant argues that the visual effect of North Tenement solar development has been included in the existing landscape and visual baseline. It states that plans for Great Harmeston have already been considered and are 'not significant'. These reasons are not well considered and do not reflect the impact on the landscape, or on the well-being of residents.

Northmoor Common

The visual impact from Northmoor Common is considered at 3.2.4 of the Technical Note. The common is a public amenity space of approximately 24 acres yet no viewpoints have been supplied by the applicant from within its boundaries. It is stated that the image from Viewpoint 9 is an adequate representation of the effect of the adjoining Eastern Array on users of Northmoor Common. However Viewpoint 9 is a distant view taken from an elevated position from the bridleway. The viewpoint is

shown on the OS map as 75 metres above sea level, whereas the proposed site is 50 metres above sea level.

The image below is taken from a point within the common and is a more realistic representation of the effect. The land occupied by the common is lower than that of the Eastern Array fields and as such it cannot be screened by the proposed tree planting.



Question 7: Wintering Bird Surveys

The inspector noted PCC's comment that the applicant's surveys were over 2 years old. The response by Qair/Axis is that it is likely that there is no change and that a survey could be carried out as a post-planning condition.
We consider that an up-to-date survey would be necessary pre-planning consent in order to measure current populations and mitigate effects including:

- Fragmentation: Large-scale solar arrays can break up the contiguity of the landscape, creating barriers that migratory birds may be reluctant to cross.
- Collision and disorientation Risk: Photovoltaic panels can create a "lake effect", where the reflective surface is mistaken for a body of water by birds, particularly migrating waterbirds. This misdirection can lead to fatal collisions with the panels
- Flight corridors: If a solar farm is situated directly within or adjacent to a recognised migration or flyway corridor, the collision risk increases significantly for all travelling species.

- Disturbance in the construction phase: Noise, vehicle movements, and human activity during construction can cause significant disturbance to birds using adjacent habitats, particularly during sensitive periods like the spring/autumn migration or the overwintering period.

- Operational phase: The ongoing presence of the infrastructure (fencing, security lighting, maintenance activity) may cause some species to avoid the area, effectively reducing the available habitat for foraging and roosting.

- Indirect ecological effects (Food web impact): Reduced foraging is caused by changes in vegetation management (e.g., grass height, use of herbicides) within the solar farm and its buffer zones can impact the insect and invertebrate populations. This reduces the food availability for insectivorous migrants like the Swift and thrushes like the Redwing, undermining the value of the stopover site.

Questions 8 & 9: Moorland Road conflicts & impacts of road widening

We do not agree with the applicant's statement that their Construction Traffic Management Plan submitted with the original application "proposes appropriate measures." It is not acceptable that the final details will be provided by the appointed contractor. Over the period of construction there will be a very significant effect on users of Moorland Road. We believe that the highway plans should be provided in greater detail at this application stage of the proposed development.

The proposed road widening measures in the plans 'Highway Interventions' and 'Highway Interventions Overview' are not to scale and do not indicate the width of the passing places. However, the lengths of the passing places are shown to the centimetre so we believe that the developer is aware of the widths, and consequent intrusion into private land, but has chosen not to show it. Qair/Axis have been asked by our group to confirm the key to the coloured lines on their plans, and also whether the passing places will be constructed on privately owned land – they have responded with the key to the plans and also advised that 'The proposed passing bays fall within the public roadside (Extent of Highways)'. However, it seems clear from their plans that this is incorrect.

The application refers to six 'highway interventions' along Moorland Road to accommodate construction traffic. We believe that all of these locations will encroach onto privately owned land and that the landowners have neither been consulted nor have given permission for their land to be used for this purpose.

The planning application appears, therefore, to be reliant on land that is not currently available to the applicant or developer. We would ask that PEDW verifies that all land ownership interests have been correctly identified before any planning decision is made.

Residents need confidence that the information submitted as part of the application is accurate and that the rights of private landowners are being properly considered. The proposed passing places appear to be a key component of the traffic management proposals. If the identified locations cannot legally be used, then the impact of construction traffic on the village could be significantly different from that described in the application.

Where an application includes land that is not owned by the applicant, the relevant ownership certificate must be completed and notice must be served on the affected landowners as a part of the application

In these circumstances, Certificate B should be completed and the required notices served on all relevant landowners. If this process has not been carried out, then the application may be invalid and should not be determined until the statutory requirements have been met.

We therefore request that PEDW reviews the ownership certificates and verifies that the statutory notices have been properly served on all affected landowners. We also request that the Inspector gives careful consideration to whether the proposed traffic management arrangements are lawful, achievable and accurately represented.

We are alarmed at the apparent naivete in the suggestion that 239 metres of established hedgerows can be removed for 12 months as a solution to the predicted increased traffic during the construction period. There is comprehensive ecology and habitat in these hedgerows which cannot simply be replaced by replanting at the end of the contract. (The retention of roadside hedging was quoted by Pembrokeshire County Council Planning Department in refusing a recent application for works to a property in Moorland Road so why should this application be any different?)

Pembrokeshire hedge banks:
The proposal includes the removal of ancient Pembrokeshire hedges alongside Moorland Road. These are localised historical features unique to the county, consisting of an earthen core packed and tightly packed between sloping stone walls. As well as being historical artefacts, they form vital wildlife corridors. Planting new hedges will not replace these ancient features. We suggest that a separate biodiversity impact assessment is vital to assess the full impact of removal of these features.

In addition, by our approximate measurements (as it is difficult to be accurate from the plans tabled) we do not believe that the statutory requirements given in the Highway Code for safe passing widths to pedestrians, riders and cyclists can be accommodated even with the proposed highway interventions. We question whether, in fact, traffic servicing the site would wait behind anybody using the road until they reach a passing place. We believe that the traffic during the construction period will present a significant danger to existing users of Moorland Road.

We would repeat that the road is no more than a track with a tarmac surface and, whilst we accept that is currently used by some agricultural traffic, there is no doubt

that there will be a large increase in the rate of surface deterioration as a result of the predicted increase in heavy and light traffic over the construction period.

We are also concerned about the access to Moorland Road. There is a junction with Targate Road and then only 50 metres to the main Pembroke Road. There is difficult sighting when both entering and exiting Moorland Road and there is a bus stop adjacent to this double junction which is used by the local schoolchildren when collected/delivered by coaches (which have to stop at the junction) when going to/from school. The increase in traffic at the beginning and end of the working day will certainly increase the likelihood of accidents and traffic congestion generally. We are particularly concerned about users of the bus stop since the 'Highway Interventions' show that the kerb line in front of the shelter is to be reduced.

We have previously described our concerns over the problems that will be caused by the installation of the cable along the full length of Moorland Road.

We are at a loss to understand how such a large development can have initially been considered with the inevitable impact on such a small community.

Question 10: Northmoor Common habitats

In response to PCC's Common's Officer's request regarding the endangered Marsh Fritillary butterfly, the applicant has added extra information to the EcIA, ES Addendum and Shadow HRA. However these are small and tokenistic details. For example the planting of devils bit scabious, which already exists in abundance on parts of the common, will not encourage a larger population. In addition to the plant itself, these butterflies need a microclimate of warm, damp, open conditions. Solar panels in the adjoining Eastern Array will not produce this microclimate so it is extremely doubtful that more planting will have any impact.

The applicant's claim that mitigation measures in the Construction Environmental Management Plan that have been a suggested for other nearby sites would be adequate for Northmoor Common is not acceptable. The common has its own ecosystem of plants which support several species of bats, reptiles and birds. The result of the development would if approved, undoubtedly be habitat fragmentation and loss of wildlife.

Question 11: Gas pipeline

Due diligence has been absent with regard to the gas pipelines and the historic infrastructure which shares the underground dimensions of the 2 array sites.

The Agricultural Land Classification report written by Oracle on 24 December 2025 states incorrectly that the 2 sites are transected by 2 high pressure gas pipelines. This erroneous report contradicts the Axis map of December 2025 which clearly shows that there are 3 gas pipelines.

The soils and subsoils contain much clay which retains soil moisture, even in the last 2 dry summers of 2025 and 2026. There are shallow aquifers around the whole of the 2 sites - visible evidence of which exists all year round by the watercourses and the well on Northmoor Common. The cables necessary to conduct both the DC and AC voltages of the solar panels to the inverters and substations and thence to the pylon into the OHL pylon will create electromagnetic field effects, which will have a galvanic corrosion effect on the cable screening, the PV frame supports and the pipelines. Groundwater will assist with current and voltage flows, thereby accelerating galvanic corrosion effects on all metallic objects under the sites and in a radius surrounding the actual sites where metals exist.

There is no evidence in the documents supplied by Qair/Axis that they have completed a full, detailed risk assessment of the potential impact of the suggested Solar Farms on the buried high pressure LNG pipelines. A detailed report is required to prove that the risks have been assessed and mitigated in line with the UKOPA Good Practice Guide: Requirements for the Siting and Installation of Solar Photovoltaic (PV) Installations in the Vicinity of Buried Pipelines.

The abandoned mine working seams and shafts further intersect the 2 array sites at varying shallow depths and carry constant flows of metallic salt laden waters. The clear evidence of such ferruginous flows is clear to see as they eventually flow deep yellow-coloured streams into the River Cleddau nearby. (See later note)

Ferrous and ferric salts are but 2 of the metals flowing underneath the 2 proposed array sites. Nickel and cadmium are also commonly found, along with sulphur, phosphates and nitrogen salts. The introduction of other metals via the solar arrays' aluminium and steel infrastructure, plus breakdown products of damaged PV cells will introduce a huge further risk of greatly increased galvanic potential into the subsoils. The water flows underground would facilitate the rapid movement of the metallic salts and acids, thereby creating a significant corrosion and eventual rupture of the 3 high pressure gas pipelines. This has the potential to create a massive explosion risk in such close proximity to Freystrop residents whose properties are close to the 2 solar array areas.

Subsidence of land locally to the 2 proposed solar sites is a known hazard to all buildings and infrastructure. The subsidence is caused by the intensive network of the old mineworking seams and exacerbated by the active aquifers which cause erosion within the old workings and eventual collapses

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Additionally, mine shafts have collapsed in the immediate vicinity of both the proposed solar arrays and the BESS/substation complex. Further disturbance of the seams and shafts could cause watercourses/aquifers to reroute invisibly, initially with subsequent sinkholes and possibly catastrophic damage to the gas pipelines or overhead power lines.

Pipeline damage would cause a halt to much or all of the LNG trade at the Port of Milford Haven. It is well known that methane storage within the UK is very limited for both domestic and industrial use as well as gas fired electrical power generation - and solar power is currently useless without gas-fired power station or nuclear back up.

PEDW and Qair/Axis should already be fully aware of further risks to the integrity and safety of the 3 pipelines which underscore the 2 separate solar array sites. The Coal Authority has been very clear in multiple communications that the mine workings pose a major risk to personnel during both construction and use of an operational site.

The gaseous emissions risk is not solely one of toxicity to humans and livestock, also the presence of both methane and hydrogen sulphide pose a very real risk of explosion which may transmit easily along the mine seams and shafts which cross the high pressure gas pipelines many times.

(See also later comments later regarding BESS and River Cleddau effects.)

Question 12: Schedule of conditions
Question 13: Decommissioning

We note that the additions to the Draft Schedule of Conditions do not include the requirement to supply a bond against adequate restoration of the land in the decommissioning process, as is mentioned by the Inspector in his letter of 24th July. The applicant's inadequate reply is that they have not been asked by PCC for a financial guarantee and that they are not aware of other cases where financial guarantees are required.

It should be considered as part of the examination process that there are serious concerns about the financial stability of Qair/Axis. This information is available in the public domain and shows extensive loans and financial interests outside the UK.

The applicant states that they have made a private agreement with the landowner to decommission the site, which would come into operation if they were unable to fund it themselves. We believe that such an agreement would be legally unenforceable because it cannot be assumed that the landowner (or his estate if he is deceased) would be in a financial position to fund the extensive decommissioning costs, raising the question of who would ultimately be responsible.

In the event that there is no individual or body to fund the decommissioning, the local community would be left with an unsightly industrial landscape with all the associated risks from vandalism and pollutants.

The details of any agreement between Axis/Qair and the landowner Mark Atherton needs to be made available to the inspector and scrutinised by legal experts. We have no doubt that the Inspector will wish to investigate its legality and whether an

agreement with a private individual is enforceable. In our view there should be a legally binding decommissioning bond in place with a public body before the commencement of any works.

Other concerns by interested parties

In addition the applicant was invited to address 'other concerns by interested parties'. They have chosen not to address several other issues that we consider to be key considerations in determining the application, including:

Land classification

We note that no mention has been included relating to the changes in land classification, from BMV 3a and 3b, to 3b and 5. This has become a major topic in recent correspondence, of which we are sure that the Inspector will be aware. It has also been the subject of communication with the First Minister. One of the individuals named in the complaint was tasked with providing an answer, which we therefore cannot accept as being fair and objective. We regard the land classification as a key issue in determining the application and an intentional omission on the part of Qair/Axis.

Absence of plans for inverter

The fact that the Eastern Array site is some distance away from the grid connection in the Western Array area necessitates the laying of a 1.6km connecting cable. The applicant has yet to declare plans for an inverter system at Middle Hill to convert the Photo Voltaic DC output to AC voltage, in order to reduce transmission losses during the transmission of voltage to White House Farm. The developer should be asked to submit plans indicating the inverter site and its dimensions, and the amount of noise that will be generated. It should also be noted that a second inverter will alter the carbon impact of the development and the quoted figures (ref: Q1 Carbon Balance) will be a significant under representation.

The further risk posed by the BESS and inverters

Studies of other solar arrays with battery storage systems around the globe show much evidence that there is a significant risk of fire within the BESS compound, with a necessity for huge volumes of water to cool the batteries which are on fire before extinguishing the fire.

Qair/Axis have only supplied water related information based upon the volume of water they believe is required to extinguish a BESS type fire. Other critical information that is required is how they intend to efficiently cool the systems to prevent a fire in the first instance. There has been no documentation supplied on this key element for its merits to be assessed.

Qair/Axis have shown no plans as to how a potential fire would be suppressed and furthermore how to initially supply and store such a huge volume of water, including where the water would drain during and after fire cooling and extinguishing.

Qair/Axis have allowed for water storage of 228,000 litres local to the BESS facility. From other research (NYFRS, Kingsway Project etc) the suggested volume required to extinguish a BESS fire would be nearer 5,000,000 litres, some twenty times larger than what they suggest. The Inspector should ask:

What provision has been made if additional volumes of water are required in excess of the 228,000 litres suggested?
Where will this water be supplied from and is it of the necessary supply volume, pressure and quality to ensure efficient fire-fighting methods?
Where is the detail relating to what would happen in the event of a power outage? Would there be an uninterruptible water supply, diesel generator back up pumps or elevated water storage tanks, high enough and large enough to ensure sufficient flow and pressure for fire-fighting purposes?

These are key considerations and the detail is surely vital in considering the merits of the proposal from a key safety perspective.

They have also stated that they will supply suitable storage to ensure that this heavily contaminated fire-fighting water is contained. Industry guidelines state that containment capacity should be at least 110% of the volume stored so the containment volume would need to be c 250,000 litres. Qair/Axis have not confirmed the actual containment volume. However, based upon the research this volume of stored water and the subsequent containment capacity is vastly undersized.

The resulting extinguishing water would contain a highly dangerous and toxic mix of metallic compounds and acids - including hydrofluoric acid, which in itself presents a highly corrosive and uncontrollable risk to the gas pipelines.

The presence of the shallow mineworkings, aquifers and then the 3 gas pipelines present a 3 dimensional risk of electromagnetic corrosion, galvanic corrosion, chemical corrosion and even mechanical damage from heavy contractor vehicles and plant.

A full and accurate 3D survey should be undertaken to complete an accurate assessment of risks posed by the underground hazards described above. It is well understood locally that not all of the mine seams and shafts may be seen on the Axis map of December 2025 as many of the mines locally were privately or family owned and were not charted - accurately or if at all.

The River Cleddau - the most polluted river in Wales
The proposed solar arrays pose a huge risk to the 3 high pressure gas pipelines and simultaneously a huge pollution risk is presented to the River Cleddau.

The West Wales Nutrient Management Board has halted all construction work in the River Cleddau catchment areas initially due to phosphate and nitrogen pollutants in the fresh water and marine environments respectively. The Qair/Axis proposal has a highly significant risk of greatly increased pollution via the 3 gas pipelines, the old mineworkings and the aquifers as they all form a conduit for water-borne pollutants to enter the marine and freshwater environments.

This proposal must therefore not proceed unless Qair/Axis and PEDW can guarantee with 100% certainty that the project presents no risk to the 3 gas pipelines due to explosion at Freystrop and resulting commercial disaster for the Port of Milford Haven.

In the longer term there must also be zero pollution risk to the River Cleddau from construction until after the site has been decommissioned i.e. a minimum of a 50-year guarantee of no pollution and adequate fire suppression at the BESS.

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