



FREYSTROP COMMUNITY COUNCIL

PLANNING & ENVIRONMENT DECISIONS WALES

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8 July 2026

REF: 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

1. Introduction and purpose

Freystrop Community Council submits this representation in respect of the above application for a Development of National Significance. As the tier of local government closest to the site, our role is to represent our community and to help ensure that the application is determined fairly and on complete information.

In this representation our purpose is threefold: to press the case for a genuine and secured community benefit; to convey our support for the issues identified by the local residents' group as matters that should be resolved before any decision is made; and to set out fairly the range of views expressed by our community.

2. The need for a secured community benefit

The Council's principal concern, is that a development of this scale should bring a fair and secured return to the community that would host it, and that as the application stands, it does not.

The proposal would occupy a substantial area of land in the village for around 40 years, with the associated construction disruption and long-term change to the area, while the electricity generated, and the revenue from it, would be exported from the locality.

Against that, nothing has been secured for the community: the applicant has confirmed that any community fund would sit outside the planning merits of the application, no

fund has been defined or guaranteed, and preliminary discussions between the developer and councillors produced no agreement.

This sits at odds with the clear direction of Welsh policy. Future Wales: The National Plan 2040 and Planning Policy Wales both look to maximise the benefits of renewable energy for the communities that host it and to encourage local and community ownership. That direction has now been reinforced by the change of government in Wales: Plaid Cymru, which committed in its 2026 programme to requiring, as a condition of consent for energy projects over 10 MW, **“a minimum community-ownership stake of between 15 and 25%”** or an equivalent secured local-benefit or wealth-fund payment so that communities have a meaningful stake in, and a fair share of the proceeds of, the renewable energy generated in their areas.

This proposal, at an export capacity of up to 30 MW, is well above that threshold, yet offers the community no ownership stake and no secured benefit of any kind. Whatever view is ultimately taken on the merits of the scheme, the Council asks that, consistent with the direction of Welsh Government policy, no consent be granted without a binding community-ownership stake, or an equivalent secured local benefit, commensurate with the scale of the development and the burdens it would place on Freystrop.

The below shows an extract from the Plaid Cymru Manifesto 2026;

“
...

To further ensure that our communities really benefit from renewable energy in Wales, we will:

-
- *Prioritise meaningful community ownership and back the development of energy communities ...*
 - *...*
 - *Require a minimum community-ownership stake of between 15 and 25%, equivalent local-benefit model, Wealth Fund payment, or corresponding means of capturing community benefits for all energy projects over 10 MW, as a key condition of consent. We will also make sure that business rates on wind and solar farms are retained by those local authorities in which they are located.*
 - *Ensure the scale, siting and cumulative impact of energy developments – including transmission and distribution infrastructure – are properly considered through the planning system, favouring well-designed, appropriately dispersed projects that balance local impact with efficient delivery, while protecting productive agricultural land.*
 - *...”*

3. Issues raised with the application

The following issues have been identified by the Freystrop & Friends Solar Action Group, a local residents’ group whose members include several with relevant professional and technical expertise, and who have undertaken extensive research into the application and its supporting documents. Having considered their work, the Council supports their finding that these are genuine issues with the application that need to be addressed before a decision is made. Their detailed, fully referenced document is attached to this

representation as **Appendix A**, and we urge that it be read in full. In summary, the issues raised concern:

- **Agricultural land — the survey has been refused validation.** The Welsh Government's own Land Quality Advisory Service declined to validate the applicant's agricultural land classification survey, and the predictive mapping points to a substantial area of Best and Most Versatile (BMV) land. The basis on which the site was re-graded to a poorer classification has not been independently accepted. No alternative-site or sequential assessment has been carried out.

The Welsh Government has a policy to ensure BMV land is used for food production and should not be used for large-scale solar development. The below is an extract from the Welsh Governments Records relating to 30 June 2026.

[Laura Anne Jones13:58:25](#)

First Minister, I welcome your answer on the importance of food security, and it's good to see that you're thinking about it. But you cannot, on the one hand, say that food security matters, it's your aim, you have a plan that would require as much farmland as possible, and then, on the other hand, allow prime agricultural land or food production land to be taken out of food production and used instead for large-scale solar developments. So, First Minister, which is it that you want?

[Rhun ap Iorwerth13:58:54](#)

First Minister of Wales

I think my views on this are very, very public. I do not believe that BMV land, the best and most versatile land, should be used for large-scale solar. There are planning rules in place in Wales that mean that we should be protecting this land for food production. This is a Government that will want to uphold those rules that are in place for very good reason.

Amended Soil Classification 6 July 2026

Much of this representation was prepared before the revised land classification was published. Given the late stage at which it was validated, we have not been able to commission our own soil sampling or evidence in response.

- **Battery safety and the gas main — an outline-only case, deferred past the decision.** A high-pressure gas pipeline crosses the northern parcel, yet the Battery Energy Storage System safety case remains an outline document, with the firewater strategy and separation distances deferred to post-consent detailed design, no battery type selected, and no Health and Safety Executive response on the file. The fire service gave only a generic no-objection without assessing battery-specific risk.
- **Coal-mining legacy — the decisive investigation has been deferred.** The site lies over historic coal workings with multiple recorded mine entries; the Mining Remediation Authority confirms a risk to surface stability and public safety, and

the applicant's own ground investigation rates the principal hazards as high — yet the intrusive Phase 2 investigation is being left to a planning condition rather than completed before the decision.

- **Ecology — an incomplete baseline and an unresolved consultee.** Natural Resources Wales identified survey gaps (including out-of-season and missing surveys) and indicated it would be likely to object pending further information. Significant effects on protected species and on European designated sites downstream cannot currently be ruled out. Freystrop is very nature rich with a number of rare and declining species thriving in the area. The recent study commissioned by the Welsh Government on the effects on wildlife following the construction of the Llanwern solar plant highlights the serious harm caused to waterways by leakage of dangerous pollutants. This study also raises concern about a potentially significant drop in the protected bat population along with bird and bee reductions, and brings into question the effectiveness of mitigation measures.
- **Highway safety — disputed figures and substandard access.** The County Highway Authority does not accept the applicant's traffic assumptions, visibility at the access falls below the relevant national standard, and the applicant's traffic survey was undertaken on the wrong road during the school holidays. Construction traffic would use narrow lanes that cannot accommodate two large vehicles passing.
- **Cumulative impact, amenity and heritage.** The cumulative assessment was confined to a 2.5 km radius, excluding much larger schemes nearby; the applicant's own assessments concede residual noise, glint/glare and significant visual effects; and Cadw has registered concerns, with buried archaeology confirmed but not fully characterised.

A consistent theme of these concerns is that a number of decisive safety and environmental questions appear to have been deferred to the post-consent stage. The Council shares the view that matters of this kind should be resolved before, rather than after, a decision is taken.

4. The range of views in our community

To assist the process, the Council invited residents to share their views with us. The invitation was publicised through local social media and posters over a short period, and we recognise that it will not have reached every resident; the points below therefore reflect the range of opinion among those who responded, rather than a complete survey of the village.

Points raised by residents **opposed** to the proposal included:

- the loss of good-quality agricultural land for around 40 years, and concern about food security and whether the land would be restored;

- fire, safety and pollution risk from the battery storage, including the proximity of a high-pressure gas pipeline and the risk of contamination reaching local watercourses and the Cleddau;
- harm to wildlife and habitats, including bats and birds, and the effect on Northmoor Common;
- the cumulative effect of multiple solar developments in the surrounding area;
- landscape, visual and rural-character impact, and possible effects on tourism;
- construction traffic and disruption on narrow local roads, including safety at the bus stop used by schoolchildren;
- the safety of pedestrians on Moorland Road during construction: a narrow road with no footpath, used on foot by residents, which would see a very large increase in heavy traffic throughout the construction period.
- the safety of horse riders and the loss of safe off-road bridleway routes during construction;
- noise during construction and from the operating plant;
- the absence of any guaranteed benefit to the community; and
- uncertainty about decommissioning and long-term restoration.
- Consideration needs to be given to the health and wellbeing of the community of Freystrop. The stress and worry has already impacted many residents with concerns about the potential long term noise, danger from construction and loss of access to nature rich areas in the village. We ask that consideration is given consistent with the well-being goals from the Well-being of Future Generations (Wales Act) 2015.

Points raised by residents **in support** of the proposal included:

- the importance of renewable energy in reducing reliance on fossil fuels, for both energy security and climate objectives;
- the value of the UK generating more of its own electricity as demand from electric heating and transport grows;
- support for the farmer (proposed site land owner) being able to derive a stable income from part of their land;
- a view that solar is a relatively low-impact form of generation compared with the alternatives; and

- conditional support, provided that impacts are properly mitigated — for example by burying cables, bunding the battery compound to prevent contamination, securing removal and full restoration at the end of the scheme's life, and providing a benefit or compensation to local dwellings.

The Council notes that even among those who expressed support, the expectation of effective mitigation and of a tangible local benefit was a recurring theme — which reinforces the request made in section 2.

5. Our request to PEDW

The Council respectfully asks that PEDW:

1. ensure that no consent is granted without a binding community-ownership stake or an equivalent secured community benefit, consistent with the direction of Welsh Government policy;
2. require the issues identified by the action group, and set out in Appendix A, to be properly addressed and resolved **before** the application is determined, rather than deferred to post-consent conditions; and
3. give full and fair weight to the range of community views summarised above.

6. 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 A — Freystrop & Friends Solar Action Group, Formal Objection to the White House Farm Solar & BESS Development

Formal Objection to the White House Farm Solar & BESS Development

Submitted by: Freystrop & Friends Solar Action Group (a local residents' group supporting responsible renewable energy development).

Application: Proposed solar farm (export capacity up to 30 MW) with a co-located Battery Energy Storage System (up to 12 MW), on approximately 52 ha of agricultural land at White House Farm / Middle Hill Farm, Freystrop, Pembrokeshire (40-year operational life) — before Planning and Environment Decisions Wales (PEDW), ref CAS-03107-C5X9W1.

Overview: We strongly object to this proposal. While we support renewable energy in principle, this scheme's adverse impacts far outweigh its benefits. It conflicts with multiple planning policies and the Well-being of Future Generations Act and poses serious risks to public safety, agricultural land, ecology, heritage and local amenity. Crucially, the great majority of the concerns below are drawn from the applicant's own submitted documents and the responses of statutory consultees. We urge PEDW to refuse consent.

References are made to Planning Policy Wales (PPW, Edition 12), Future Wales: The National Plan 2040, Technical Advice Notes (TANs), the Pembrokeshire Local Development Plan (LDP), the Well-being of Future Generations Act and relevant regulations. A summary table of refusal grounds is provided at the end.

One of the main concerns throughout the FFSAG involvement has been the vague nature of the proposals by Qair. A "conventional" planning application should contain detailed drawings, tech specifications and accurate surveys of ground conditions, biodiversity, pollution risks, fire risks, compliance with LDP, Section 106 agreements, highways and transport issues etc. These all allow a rational objection to be placed in front of the planning authority. The granting of DNS status to Qair Ltd seems to have allowed the company to delay decisions of the technical specifications until after planning permission has been granted.

In brief, anyone who wishes to object to the proposal does not know all of the precise criteria against which to formulate a fully accurate objection.

For example:

1. The lack of technical specifications of the solar arrays, both the PV panels and the metal infrastructure has meant that we were not able to predict the galvanic corrosion potential caused by the dissimilar metals in a wet, metal-salts-polluted, perched water table.
2. The lack of specification for the BESS and its supposed fire suppression system has hidden the danger to the nearby residents from fire and a major pollution risk to the nearby River Cleddau and the 3 LNG pipelines which pass under the 2 solar array sites. It is a known risk with 7 BESS fires already recorded in the UK. But Qair have chosen to hide the specifications until planning permission has been granted.
3. Warnings from the Coal Authority that the abandoned mineworkings may present a significant health risk to construction workers and residents alike. Many of the seams and shafts are shallow and the depth of the PV infrastructure supports present a real risk of releasing toxic and explosive gases. The shallow mineworkings are also a further chemical risk due to the ferruginous outflows seen in streams around the 2 Freystrop solar array sites. Qair have failed to even acknowledge the

risks posed by the mines, especially in coordination with the BESS, the aquifers/water table and the LNG pipelines.

The 2 solar arrays as proposed are planned to be on good quality grass producing, mainly BMV Grade 3A land. Under the strict **Agricultural Land Classification (ALC) of England and Wales guidelines** (which the [Welsh Government](#) enforces), taking soil samples when the ground is waterlogged or heavily wet, as the applicant has done to support its case, can highly distort the land's grade. We will demand full discovery of the methodology, the soil mechanical and nutrient test results, together with the climate details, the soil wetness class determination and make comparison with the contemporaneous photographs taken by Freystrop residents and local witness statements.

GROUND 1 — MAJOR ACCIDENT RISK: BESS FIRE SAFETY AND PROXIMITY TO HIGH-PRESSURE GAS INFRASTRUCTURE

Outline of concern: The BESS compound is located close to a high-pressure gas transmission pipeline, and the application fails to demonstrate that the major-accident risk can be safely managed or that expert safety consultees support the proposal.

A high-pressure gas main crosses the site. The applicant's own ground investigation confirms that a 1,200 mm high-pressure gas pipeline crosses the northern parcel. A lithium-ion battery fire or explosion in the BESS compound could threaten this critical infrastructure, with potentially catastrophic consequences.

Source: Planning Statement Appendix A — Phase 1 Ground Investigation & Coal Mining Risk Assessment, §3.4.

No HSE consultation or safety clearance. Development near major-accident-hazard pipelines should be the subject of consultation with the Health and Safety Executive (HSE). The submission contains no HSE response, and no confirmation that the BESS location lies outside critical blast/thermal consultation zones.

The Fire and Rescue Service did not assess BESS-specific risk. Mid and West Wales Fire and Rescue Service returned only a generic 'no objection', did not assess the BESS fire risk, and expressly reserved the right to require static water supplies if the existing infrastructure proves inadequate.

Source: Appendix B.54 — Response, Mid and West Wales Fire and Rescue Service.

The safety case is only 'outline' and deferred past the decision. The Battery Safety Management Plan is expressly an outline document: the full plan, the firewater strategy and the separation/buffer distances are all deferred to 'the detailed design process' post-consent. No battery manufacturer has been selected. No assessment of the degradation of batteries has been included. PEDW is being asked to approve a major-accident installation before the information needed to judge its safety exists.

Source: Planning Statement Appendix C — Outline Battery Safety Management Plan, §§1.2.1, 5.1.1, 5.2.20, 9.1.1.

We have compiled the following references which back up our concerns regarding the lack of information supplied regarding how the BESS will be cooled and how a fire would be safely extinguished without significant harm to the environment.

1. Fires caused by lithium-ion batteries double in two years - QBE European Operations
2. Kingsway Solar Community Action Response to the Statutory Consultation_Final
3. Battery Energy Storage Systems - North Yorkshire Fire & Rescue Service

Conclusion: Approving an inherently volatile BESS adjacent to high-pressure gas infrastructure, without HSE input or a finalised safety case, would expose the community and critical infrastructure to an unquantified major-accident risk, contrary to PPW (public safety), LDP Policy GN.1 and the precautionary principle.

GROUND 2 — LOSS OF BEST & MOST VERSATILE AGRICULTURAL LAND

Outline of concern: The development would result in the loss of a substantial area of Best and Most Versatile (BMV) agricultural land. The development would consume over 11.75% of the community's farmland. Referring to the Welsh Government Agricultural Land Classification and the interactive maps; all of the land within the boundaries of the development is Grade 3A or Grade 3B. 60% of the site's areas are classified as Agricultural Land Classification grade 3A farmland, or Best and Most Versatile farmland.

The Welsh Government's land adviser refused to validate the survey — twice. The Welsh Ministers' Land Quality Advisory Service (LQAS) found the original survey 'could not be accepted as an accurate assessment of land quality at the Site, citing insufficient information', and that the revised report 'contained significant changes to soil textures, soil properties and grade distribution when compared to the initial report. As such, the revised report was not validated by LQAS.' No LQAS validation of the final survey appears in the submitted documents.

Source: Environmental Statement Vol.4 Appendix 6-2 — ALC Survey Report Correspondence (LQAS, 16 December 2025).

The land was re-graded worse on paper, with almost no new survey work. The applicant's earlier (March/July 2025) survey graded the site as containing 0.8 ha of Subgrade 3a (BMV) and 24.6 ha of Grade 4. The final (December 2025) survey re-cast that 24.6 ha of Grade 4 as 30 ha of Grade 5 — i.e. graded materially worse — and eliminated the BMV land entirely, on the basis of just four additional trial pits dug on 12 December 2025. This is precisely the unjustified 'downgrade on paper' that LQAS criticised.

Doubt is cast on the applicant's December survey by statements from the agricultural contractors, Locke Brothers, who cut the grass at White House Farm for silage in 2025 - during a dry year for most grassland. The contractors reported 3 very good crops of silage grasses, primarily from perennial ryegrass varieties. The 3 cuts were all about or above 63% digestibility. 63D is the benchmark for high quality, high sugars silage which facilitates a lactic acid fermentation to lock in the nutrients within the "pickled" grasses of silage.

Keith Locke confirmed that 3 good cuts of quality silage were taken in 2025 with the caveat that they had to be careful regarding the equipment used due to the wetness of the ground, especially early in the season. And that soil moisture at that site grows good crops of grass in a dry year.

The statements from Locke Brothers, who face potential business interruption to their contracting business, reinforces the concerns that should the application be successful, the construction subcontractors will have much less concern regarding soil compaction in wet conditions. This increases the probability that the site could never be returned to BMV Grade 3A status.

The high water table is one of the factors which reliably grow grass in dry periods on the land. Running heavy machinery which construction contractors will use over such a wet soil type will compact such land. The use of forklifts, heavy trucks, trailers etc will randomly cover much more soil surface than silage cropping which is in rows, including fertiliser or muck spreading which use wider, low ground pressure tyres on the contractor's tractors, trailers, tankers etc.

Source: ES Vol.4 Appendix 6-1 (final ALC Survey, Table 7) compared with EIA Scoping Appendix B (earlier ALC Report, Table 6).

The methodology cannot produce a BMV result. By the applicant's own admission in correspondence, the grade 'was not dependant on the presence of a Slowly Permeable Layer' yet the methodology 'would default to Sub-grade 3b regardless' — in other words, the assessment was structured so that it could never return Subgrade 3a (BMV), whatever the soils showed. Under the strict **Agricultural Land Classification (ALC) of England and Wales guidelines** (which the [Welsh Government](#) enforces), taking soil samples when the ground is waterlogged or heavily wet, as the applicant has done to support its case, can highly distort the land's grade. We will demand full discovery of the methodology, the soil mechanical and nutrient test results, together with the climate details, the soil wetness class determination and make comparison with the contemporaneous photographs taken by Freystrop residents and local witness statements.

The applicant's own data points to better land. The survey concedes the site is 'ALC Grade 2 based on climate'; every trial pit graded Grade 1 for droughtiness; and stoniness graded Grade 1 across the eastern pits. The downgrade rests solely on a contested wetness/slowly-permeable-layer limitation — the very point on which LQAS demanded further trial pits and told the applicant to stop assuming a best-case wetness class. The Welsh Government Predictive Map records approximately 32 ha of Subgrade 3a (BMV) land.

Sources: ES Vol.4 Appendix 6-1 (final ALC Survey, §5.2.3 and Tables 3 & 6); Appendix B.4 — LQAS response. (This corrects the 3.3 ha figure in our earlier draft.)

No sequential approach and no site search. PPW (Edition 12) requires BMV land to be conserved and a sequential approach that steers development onto poorer land first. The ES expressly assessed no alternative sites — 'no alternatives are considered as part of the assessment' — and the only locational driver given is the proximity of a National Grid connection point and a willing landowner. Neither is a planning justification for using protected farmland.

Source: ES Vol.2 Chapter 3 — Scheme Description and Alternatives, §3.8.3; Planning Statement §2.1.4.

Rainfall run-off

Research into the impacts of rainfall run-off from solar farms has been undertaken by ADAS for Welsh Government in 2023, which concluded that:

"The impacts on Best and Most Versatile 1&2 (BMV) agricultural land from the construction, operational and decommissioning phases are reviewed, based on the findings of the earlier literature review (WPI), best practice and extensive experience of land restoration. The main impact of the three phases of development is deep soil compaction resulting in the loss of versatility of Best and Most Versatile agricultural land and in wetter parts of England and Wales the loss of Best and Most Versatile agricultural land. An assessment is made of the reversibility of the impacts. Soil compaction results mainly from trafficking and alleviation is reported to depths of 45cm. It can take many years for soils to recover from compaction and compaction may be permanent. Runoff from panels can result in rivulets, which can lead to soil loss by erosion."

<https://www.gov.wales/sites/default/files/publications/2023-08/impact-solar-photovoltaic-sites-agricultural-soils-land-spep21-22-03-work-package-3.pdf>

First Minister's' comments on BMV.

Finally, under this section, on 30th June 2026, the **First Minister** was very clear on his position in relation to solar farms on BMV in reply to a question in the Senedd:

"I think my views on this are very, very public. I do not believe that BMV land, the best and most versatile land, should be used for large-scale solar. There are planning rules in place in Wales that mean that we should be protecting this land for food production. This is a Government that will want to uphold those rules that are in place for very good reason."

Rhun ap Iorwerth MS / First Minister of Wales

30/06/2026 13:58:54

Source: (<https://record.senedd.wales/Plenary/16078#C765362>)

Conclusion: The applicant's evidence base has been refused validation by the Welsh Government's own adviser, the methodology is incapable of recognising BMV land, the underlying data points to better grades, no sequential or alternative-site justification has been offered and the First Minister leads a Government which wants to "uphold rules" which protect BMV for food production and should not be used for large-scale solar. This is, on its own, a strong and sufficient ground for refusal.

GROUND 3 — CUMULATIVE IMPACT OF MULTIPLE SOLAR/BESS DEVELOPMENTS

Outline of concern: The applicant has given insufficient weight to the cumulative impact of this proposal alongside other solar and energy projects nearby. Several large-scale renewable developments lie within 5 km of the site, including:

- North Tenement Solar Farm (operational)
- Tiers Cross Solar Farm (operational)
- Great Harmeston Solar Farm, Johnston (proposed, ~145 ha / ~360 acres)
- White Hill Solar Farm (proposed, nearby)
- Other solar/BESS schemes in the local pipeline

Cumulative study area too narrow. The Environmental Statement limits the cumulative study area to just 2.5 km, excluding these major projects — notably Great Harmeston, which is far larger than this scheme. No rationale is given for the 2.5 km limit, which is inadequate for landscape, ecological and hydrological effects and for highly mobile species. The combined effect of these schemes would be the progressive industrialisation of a small area of rural Pembrokeshire.

Admitted significant landscape and visual harm. Even on its own narrow assessment, the applicant's Landscape and Visual Impact Assessment concedes significant visual effects on residents at Garlandstone and at the eastern end of Moorland Road, Freystrop, which remain 'Moderate to Major adverse' even at Year 10. Natural Resources Wales criticised the photomontages as not showing effective mitigation and described the screening vegetation as 'thin and low level'. The applicant declined to provide several of the additional viewpoints NRW requested. The Pembrokeshire Coast National Park boundary lies only about 0.4 km away.

Sources: Environmental Statement Vol.2 Chapter 4 (LVIA); NRW pre-application response (Appendix B.5).

Cumulative ecology and hydrology. The Shadow Habitats Regulations Assessment did not incorporate other plans or projects, so it did not evaluate in-combination effects on European sites such as the Pembrokeshire Marine SAC and Cleddau Rivers SAC. The Marsh Fritillary butterfly (a Section 7 priority species recorded on neighbouring Northmoor Common in 2025) depends on a connected network of damp grassland that incremental development can collapse.

Conclusion: The narrow scope produces a misleadingly optimistic picture and does not give proper weight to the cumulative harm required by Future Wales Policies 17 and 18. The application should be refused, or made the subject of a Regulation 25 request for a proper cumulative assessment.

GROUND 4 — ECOLOGICAL BASELINE DEFICIENCIES & BIODIVERSITY IMPACTS

Outline of concern: The ecological surveys are incomplete and below best-practice standard, producing an unreliable baseline. Approving the project on this evidence would risk contravening wildlife-protection law and the biodiversity duty.

Significant harm to protected species is admitted. The applicant's own Ecological Impact Assessment records 16 bat species — including three Annex II species (Barbastelle, Greater Horseshoe and Lesser Horseshoe) — and concludes the pre-mitigation impact on bats is 'Significant at a County Level – Negative'. Badger, grass snake, breeding skylark and a possible otter holt are also present.

Source: Environmental Statement Vol.2 Chapter 5 (Ecology) / Ecological Impact Assessment.

Five designated sites could not be screened out. The Shadow Habitats Regulations Assessment could not screen out potential effects on five designated sites, including the Pembrokeshire Marine SAC / Milford Haven Waterway SSSI and Hook Wood SSSI. The nitrogen critical load for ancient woodland at Hook Wood SSSI is already exceeded (22.3 against a 15 kg N/ha/yr threshold).

Serious survey gaps. Natural Resources Wales identified that the otter/water-vole survey was carried out in December (the wrong season); the breeding-bird survey 'comprised fewer visits than recommended by industry best practice' and included no night-time survey; and no dormouse or

barn-owl survey was undertaken. NRW stated it ‘would be likely to object’ unless further information and securing conditions are provided.

Source: Appendix B.5 — Response from Natural Resources Wales; Shadow Habitats Regulations Assessment.

Omission of Northmoor Common and Marsh Fritillary. Northmoor Common, a species-rich area bordering the arrays, is omitted from the ES baseline despite confirmed Marsh Fritillary sightings in 2025. An adjacent owner records that the Common is a ‘24-acre public space... used by walkers and cyclists from adjoining villages’, underlining its ecological and amenity value.

Severe impact on bats, badgers and red-listed birds.

Research indicates that the proposed mitigation framework for White House Farm Solar project is likely to fail in protecting the horseshoe bats, barbastelle bats, badgers, and red-listed birds reliant on this land. The applicant proposes to offset the disruption of this ecosystem by installing 15 bat boxes, 4 barn owl boxes, and managing "other neutral grassland" wilding zones. Empirical evidence shows that these artificial measures do not work.

Post-construction monitoring reports published in 2025 for the Llanwern Solar Farm—a comparable utility-scale installation in Wales—revealed the following failures of ecological mitigation:

- 95% to 100% Collapse in Bat Activity: Independent monitoring at Llanwern showed a near-total drop in bat activity across the site post-construction.
- Rejection of Artificial Boxes: In the Llanwern study, despite numerous bat boxes being deployed, only a single box was found to be occupied years after installation.
- Avoidance of "Wilding" Areas: Ground-nesting birds and key mammalian species actively avoided the designated "mitigation fields" due to panel shading, fencing, and microclimate degradation.

Source: <https://www.gwentwildlife.org/news/new-findings-reveal-extensive-environmental-damage-solar-plants-gwent-levels-waterways-face>

Academic studies (such as Tinsley et al., 2023) confirm that solar arrays drastically reduce foraging activity for common pipistrelles and Myotis species—the exact species recorded on this site.

Source: Szabadi, K. L., Kurali, A., Rahman, N. A. A., Froidevaux, J. S. P., Tinsley, E., Jones, G., Görföl, T., Estók, P., & Zsebők, S. (2023). The use of solar farms by bats in mosaic landscapes: Implications for conservation. *Global Ecology and Conservation*, 44, e02481. <https://doi.org/10.1016/j.gecco.2023.e02481>

Conclusion: The baseline is too incomplete to demonstrate compliance with PPW Chapter 6, TAN 5, the Habitats Regulations and the Section 6 biodiversity duty. Significant harm to protected species cannot be ruled out and is in places positively indicated. Refusal is justified; at minimum, the decision should await comprehensive, seasonally-appropriate surveys.

GROUND 5 — HIGHWAY SAFETY: INADEQUATE ROAD NETWORK

Outline of concern: Construction and operation rely on access via narrow, unclassified rural lanes (Moorland Road / U6071 and Targate Road) with no footways and substandard alignment. The County Highway Authority and local residents have both challenged the applicant's case with specific evidence.

The Highway Authority rejects the applicant's traffic figures. The County Highway Authority does not accept the applicant's assumption that workers will share vehicles, and instead estimates around 144 two-way vehicle trips per day. The applicant's lower figures understate the true impact.

The applicant's traffic survey was unrepresentative. An adjacent business (represented by solicitors) records that the applicant's automatic traffic count was 'carried out along a small section of Pembroke Road only' and over 'the school summer holiday period'. Residents' own count on Moorland Road on Monday 6 October 2025 recorded 'over 315 vehicle movements... including HGV's, tractors, delivery vans and cars' plus '61 pedestrians'. They state that 'no part of Moorland Road can accommodate the passing of HGV's simultaneously', the road being 'tarmac surfacing over an old stone track' with no proper sub-base.

Source: Appendix B.11 — Response from Owner/Occupier of Adjacent Land (HCR Law).

A known accident location. A business at the crossroads states the site is 'just metres from the busy crossroads, on which over the years we have seen numerous accidents and some deaths because of reduced visibility on its approaches'. The visibility splays at the proposed access measure 94.7 m and 104.8 m — both below the 120 m Design Manual for Roads and Bridges standard. Residents also report that schoolchildren gather at a bus stop where the footpath would be narrowed.

Sources: Appendix B.52 and Appendix B.53 — Responses from Owners/Occupiers of Adjacent Land; Appendix B.3 — County Highway Authority.

Unresolved over two consultation rounds. The Highway Authority requested further work on the construction transport management plan, collision data and the construction environmental management plan in both 2023 and 2025; these requests remain unresolved, and only an outline plan has been provided.

Conclusion: The proposal would route an industrial-scale construction programme along lanes that are fundamentally unsuitable, with substandard visibility, a known accident record and unresolved highway-authority concerns. It fails LDP Policy GN.1, TAN 18 and Future Wales Policy 18(9), and should be refused.

GROUND 6 — BESS FIRE HAZARD & WATER-POLLUTION RISK

Outline of concern: The BESS facility presents risks of fire, thermal runaway, explosion and toxic-gas release, compounded by the rural location's limited water supply and access and by sensitive downstream water receptors.

The hazards are acknowledged in the applicant's own plan. The Outline Battery Safety Management Plan states that in thermal runaway 'harmful gases form, and the battery may explode', that 'regular water will not be effective', and that emissions include hydrogen fluoride

and carbon dioxide (an ‘asphyxiation risk’). The nearest residential property is approximately 225 m from the BESS; the nearest fire station is 3.6 km away and the nearest A&E 4.5 km away.

Source: Planning Statement Appendix C — Outline Battery Safety Management Plan, §§4.1.2, 4.1.4, 5.1.3–5.1.7.

Firewater containment is deferred, not designed. The firewater volumes and containment design are expressly left to ‘the detailed design phase, post-consent’. There is no demonstrated containment for the large volumes of contaminated firewater a prolonged battery fire would generate, and the Environmental Statement itself lists ‘contaminated firewater runoff... in the event of a fire’ among the operational risks requiring mitigation.

Sensitive downstream receptors. The site is hydraulically linked to the Milford Haven Waterway SSSI and Pembrokeshire Marine SAC approximately 0.9 km downstream. A local resident warns that a fire could cause ‘the leakage of lithium ion into the soil, which is then going to leach into the Cleddau Estuary protected areas’. Welsh Water has confirmed that a public sewer and a trunk/distribution water main both cross the site.

Sources: Environmental Statement Vol.2 Chapter 7 (Water Resources); Appendix B.53 — Owner/Occupier response; Appendix B.6 — Welsh Water.

Conclusion: The applicant seeks permission without demonstrating that the BESS can be operated safely or without unacceptable pollution risk, contrary to PPW’s water and pollution-prevention policies, TAN 15 and Future Wales Policy 9. Refusal is justified.

GROUND 7 — GROUND INSTABILITY & COAL-MINING LEGACY

Outline of concern: The site sits over historic coal workings. The applicant’s own ground investigation rates the principal hazards as HIGH, the Coal (Mining Remediation) Authority confirms a public-safety risk, and yet the decisive intrusive investigation is being deferred.

The Coal Authority confirms a surface-stability and public-safety risk. The Mining Remediation Authority states that ‘within the area identified for the project there are coal mining features at surface and shallow depth including; multiple mine entries, coal outcrops and reported surface hazards. These features pose a potential risk to surface stability and public safety.’ It advises that ‘building over the top of, or in close proximity to, mine entries should be avoided wherever possible, even after they have been capped’, and that untreated mine entries should be ‘fenced and kept devoid of development’.

Source: Appendix B.2 — Response from the Coal (Mining Remediation) Authority, 21 November 2025.

High-rated hazards and recorded collapses. The Phase 1 ground investigation rates recorded mine entries, surface hazards and ground gas all as HIGH risk. There are approximately 50 mine-entry records on or within 100 m of the site, and the historic Freystrop Colliery, Hook Colliery and ‘American Pit’ workings intersect it. Two historic shaft collapses are recorded on White House Farm itself (1996), one slumping to a depth of four to five metres with water observed at the base of the void.

The decisive investigation is being deferred. Both the Coal Authority and Natural Resources Wales support intrusive site investigation; the applicant seeks to defer the Phase 2 investigation to a planning condition rather than completing it before the decision. PEDW cannot properly judge the

stability and safety of the site — particularly beneath the BESS and adjacent to the gas main — on the information provided.

Source: Planning Statement Appendix A — Phase 1 Ground Investigation & Coal Mining Risk Assessment; Appendices B.2 and B.5.

GROUND 8 — RESIDENTIAL AMENITY: NOISE AND GLINT/GLARE

Outline of concern: Operational noise and reflected glare would harm the amenity of nearby residents, with the applicant’s own assessments showing little or no safety margin.

Round-the-clock plant noise with no headroom. The BESS and substation operate day and night, with a night-time BESS inverter source level of 84 dB(A). At the nearest home, the predicted rating level equals the existing background — a 0 dB excess, i.e. no headroom. Transformers are acknowledged to emit a 100 Hz ‘hum’, yet the assessment applied a 0 dB penalty for tonality. Compliance depends on a 4 m acoustic barrier and low-noise plant that has not yet been selected, so the predicted levels are unverified.

Source: Planning Statement Appendix H — Noise Impact Assessment.

Residual glint and glare. The Glint and Glare Assessment finds that 27 of 40 surrounding dwellings are geometrically able to receive reflections, with 12 dwellings left at a ‘low’ residual impact even after mitigation. The County Highway Authority records that the A4076 would experience yellow glare for up to 17.2 minutes per day, totalling around 104 hours per year — glare that ‘can cause squinting and impair vision’. Road mitigation relies on new, immature planting.

Sources: Planning Statement Appendix K — Glint and Glare Assessment; Appendix B.3 — County Highway Authority.

GROUND 9 — HERITAGE HARM & OVERWHELMING LOCAL OPPOSITION

Heritage. Cadw has confirmed it ‘has concerns’. Both Cadw and the applicant concede a ‘slight but not significant adverse effect on the setting of the Milford Haven Waterway Landscape of Outstanding Historic Interest’ — an asset of national importance. The archaeological evaluation confirmed buried prehistoric remains (a possible ring ditch and a flint scraper of possible Bronze Age date), yet the evaluation report was incomplete at the point of submission, so the harm has not been fully characterised.

Sources: Appendix B.1 — Cadw response; Planning Statement Appendix E — Archaeological Desk-Based Assessment & Heritage Impact Statement.

Overwhelming local opposition. At the applicant’s own October 2025 public event, of 55 completed questionnaires, 48 objected and only 2 were in favour — roughly 87% opposed. A further 97 written objections were received. Every adjacent owner/occupier response on the file objects; none support. All four local community councils — Llangwm, Burton, Freystrop and Hook — raised concerns or objected; Llangwm Community Council stated: ‘We strongly oppose this development.’ This in itself provides evidence that the project does not comply with the Well-being of Future Generations Act, which places communities at the heart of decision-making. We expand below on why the White House Farm Solar & BESS Development conflicts across all 7 well-being goals of the Well-being of Future Generations (Wales) Act and, therefore, urge PEDW to refuse consent on these grounds alone.

Sources: Planning Statement Appendix L — Pre-Application Consultation Report and questionnaires; adjacent-owner responses (Appendices B.11–B.53); community council responses (Appendices B.7–B.10).

GROUND 10 – INFRASTRUCTURE

On the plans and in the written proposals the applicant makes no mention of the wiring and infrastructure link between the Eastern array at Middle Hill, along the roads to the Western array and BESS at White House Farm. The distance between the 2 arrays will require that the DC power generated from the solar cells (Photo Voltaic or PV) must be converted to AC voltage to reduce the otherwise huge power losses. The inverter system required to make the DC to AC conversion is not shown. These systems create noise and require much water cooling, none of which has been identified.

GROUND 11 - WELL-BEING OF FUTURE GENERATIONS ACT

Planning and Environment Decisions Wales (PEDW) is legally required to take the Well-being of Future Generations (Wales) Act 2015 into account in its decision making. The Act's principles are fully integrated into Welsh planning policy, which PEDW's inspectors follow when determining appeals and applications.

We consider that the White House Farm Solar & BESS Development conflicts across all 7 well-being goals of the Well-being of Future Generations (Wales) Act and we, therefore, urge PEDW to refuse consent on these grounds alone.

The 7 well-being goals for Wales are:

- **Prosperous**
- **Resilient**
- **Healthier**
- **More equal**
- **Cohesive communities**
- **Vibrant culture and thriving Welsh language**
- **Globally responsible**

Below, we quote directly from the following Welsh Government's webpage on the Act: <https://www.gov.wales/well-being-future-generations-act-essentials-html>

The Well-being of Future Generations (Wales) Act is “*about improving the social, economic, environmental and cultural well-being of Wales.*”

The Act gives a legally-binding common purpose – the 7 well-being goals – for national government, local government, local health boards and other specified public bodies. It details the ways in which specified public bodies must work, and work together to improve the well-being of Wales.”

“Well-being goals

*The 7 well-being goals (‘the goals’) show the kind of Wales we want to see. Together they provide a shared vision for the public bodies listed in the Act to work towards. They are a set of goals; the Act makes it clear the **listed public bodies must work to achieve all of the goals, not just one or two.**”*

We urge PEDW to **refuse consent set against all 7 well-being goals** for the following reasons:

“Prosperous

An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing fair work.”

In order to use resources efficiently and proportionately, solar farms are best placed in the world’s sunbelt. Which has up to 3x the solar irradiance of Wales and therefore will make a much greater contribution to combatting climate change from the same installed capacity. Land availability is also much greater in places such as the Middle East, north Africa and Brazil whereas large solar farms in Wales take up a disproportionate amount of land.

The project does not generate wealth within Wales, as its ownership is entirely outside Wales, and will provide only short-term construction work with no guarantees that local employment will be used or skills and education will be enhanced, especially sustainably and in the long-term.

There has been no engagement from the developer on shared-ownership models which could benefit the community’s or Wales’ prosperity.

“Resilient

A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).”

The project will have potentially damaging effects on healthy functioning ecosystems by risking impacts on water systems and species habitats. The project will not support social and economic resilience within Wales and take away valuable land from food production, so reducing the capacity to adapt to the impacts of climate change on food security.

“Healthier

A society in which people’s physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.”

The project impacts the amenity of the community and is already impacting the mental well-being of a substantial proportion of the community by the stress and anxiety it is causing from a disproportionate and extractive development.

No attempt has been made by the developer to engage with the community on choices and behaviour which could benefit them. There is no benefit towards future health from this development.

“More equal

A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances). ”

The project will result in an unequal generation of wealth using natural resources in Wales to enrich companies outside Wales. There is no evidence that it will provide opportunities for people, regardless of background or circumstances, to fulfil their potential.

The project has led to quantified opposition from 80% of the community which is an overwhelming, local democratic mandate of opposition.

“Cohesive communities

Attractive, viable, safe and well-connected communities. ”

The disproportionately large project significantly *detracts* from the attractiveness of the community.

“Vibrant culture and thriving Welsh language

A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation. ”

There has been no attempt by the developer to promote culture, heritage and the Welsh language or to encourage people to participate in the arts, and sports and recreation.

“Globally responsible

A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being. ”

There is no improvement to the economic, social, environmental and cultural well-being of Wales from this project.

If the project is claiming to address climate change as its positive contribution to global well-being, the deployment of solar farms in the world’s sunbelt would be far more effective. Deployment in Wales is ineffective and detracts from global well-being by using resources which would be better utilised elsewhere. Solar farms will be 3x more effective and also cheaper to install in the world’s sunbelt than in Wales, so being more globally responsible in terms of their contribution to combatting climate change and in the use of both natural and financial resources. This includes being more globally responsible in the most efficient extraction of minerals, use of materials and intensive manufacturing processes which are all required for solar panels.

THE CLAIMED BENEFITS DO NOT OUTWEIGH THE HARM

The applicant's headline benefits are theoretical and the local return is minimal. The applicant claims the scheme would generate up to 30 MW, 'meet the needs of approximately 12,548 typical homes' and save 'over 16,727 tonnes of CO₂'. These are notional average calculations, not power supplied to any local home: the electricity is exported to the National Grid. The benefits should be weighed with that in mind:

- **No local energy supply:** the output 'connects to the National Grid' — it does not power Freystrop or Pembrokeshire homes directly.
- **No relation between output and demand:** by its very nature, a solar farm cannot power 12,548 homes. It is an *equivalent* output which is a very different, notional calculation. Intermittent solar requires back-up (gas), long-term/seasonal storage (BESS systems provide only diurnal storage), grid balancing and other system interventions whose cost falls on billpayers, not the developers. It's notable that the CEO of Centrica stated the following indisputable fact in relation to their purchase of Severn Power station in Newport:

"When the wind doesn't blow and the sun doesn't shine, gas fired power stations like Severn are needed to keep the lights on, to keep the EVs moving, and to keep the economy going."

Source: [https://www.linkedin.com/posts/chrisoshea_investing-in-a-stronger-more-flexible-activity-7458043211383652352-](https://www.linkedin.com/posts/chrisoshea_investing-in-a-stronger-more-flexible-activity-7458043211383652352-Ghz6?utm_source=share&utm_medium=member_desktop&rcm=ACoAAAbHgOsBMvOE8B6zUIPWecLhIuix7RdSNT0)

[Ghz6?utm_source=share&utm_medium=member_desktop&rcm=ACoAAAbHgOsBMvOE8B6zUIPWecLhIuix7RdSNT0](https://www.linkedin.com/posts/chrisoshea_investing-in-a-stronger-more-flexible-activity-7458043211383652352-Ghz6?utm_source=share&utm_medium=member_desktop&rcm=ACoAAAbHgOsBMvOE8B6zUIPWecLhIuix7RdSNT0)

Severn is an unabated gas power station. Any calculations on CO₂ savings from solar farms, which do deliver firm, 24/7 power, should take into account that they also induce carbon emissions from gas power stations.

- **Almost no local jobs:** the workforce is around 80 construction staff for ~52 weeks, and the applicant accepts it is 'unlikely that any of the construction workforce will take residence in the local area'; the control buildings 'would not be permanently manned', so there is effectively no permanent local employment.
- **No binding community benefit:** the community fund is undefined and the applicant states any such fund 'would sit separate to the planning merits of the application' — it carries no weight and is not secured.
- **Discretionary 'dual use':** continued sheep grazing is offered only 'at the discretion of the landowner', not guaranteed.
- **Unquantified biodiversity claim:** a 'net benefit' is asserted without a stated percentage, resting on enhancement that is not yet secured.

Future Wales Policy 17 is clear that renewable-energy capacity targets do not imply approval where significant adverse impacts would result. Here, the irreversible loss of Best and Most Versatile farmland, the unquantified major-accident and ground-stability risks, the deficient ecological evidence, the substandard access and the harm to amenity and heritage collectively and decisively outweigh these limited, largely non-local benefits.

Cabinet Minister for Enterprise, Connectivity and Energy's comments on the needs of communities in relation to energy developments.

On 2nd June 2026, the Cabinet Minister for Enterprise, Connectivity and Energy made these comments about ownership and the needs of communities in relation to energy developments:

"It's important, though, that that energy system delivers for the needs of Wales. We've been here before at other energy revolutions, haven't we, which didn't deliver for Wales. Part of that is about ownership, part of that is understanding what are the energy needs of our communities and our businesses."

Adam Price

02/06/2026 16:03:06

(<https://record.senedd.wales/Plenary/16060#C762746>)

This proposed energy development does not take into account the needs of the community.

A note on the ES Completeness Report. We are aware that PEDW's appointed Inspector has confirmed the Environmental Statement is 'complete' for the purposes of the EIA Regulations. That certification concerns only whether the required categories of information are present; it does not endorse the applicant's conclusions, its benefit figures, or the adequacy of the underlying surveys, all of which remain open for the decision-maker to weigh and which we say are deficient for the reasons set out above.

CONCLUSION AND RECOMMENDATION

We respectfully urge PEDW to REFUSE planning permission for the White House Farm Solar & BESS development. Should the decision-maker be minded to approve, we submit that the fundamental gaps identified above — in particular the unvalidated land-quality survey, the outline-only BESS safety case, and the deferred Phase 2 ground investigation — should be resolved through a Regulation 25 request for further environmental information before determination, not left to post-consent conditions. Given the nature of several impacts, however, we do not believe these concerns can be overcome without relocating or substantially redesigning the scheme.

We appreciate the opportunity to present our case and trust that our evidence — much of it drawn from the applicant's own documents and the statutory consultees — will be given full consideration in the public interest.

SUMMARY OF REFUSAL GROUND

Refusal ground	Key policy / legal conflict	Supporting evidence (applicant's own documents & consultees)
1. Major accident risk — BESS + gas infrastructure	PPW Ed.12 (public safety); LDP GN.1; WFG Act 2015; precautionary principle	Outline-only BSMP; BESS 225 m from homes; high-pressure gas main crosses northern parcel; no HSE consultation; Fire & Rescue gave generic no-objection without BESS-specific assessment
2. Loss of Best & Most Versatile farmland	PPW Ed.12 §3.54–3.59 sequential test; Future Wales P9; LDP GN.26	Welsh Govt land adviser refused to validate the survey; methodology structurally defaults to 3b; climate alone = Grade 2; land re-graded worse between versions; ~32 ha BMV on Predictive Map; no sequential/site search.
3. Cumulative impact under-assessed	Future Wales P17/18; PPW Ed.12 Ch.6	2.5 km cumulative radius excludes Great Harmeston (~145 ha) & other schemes; admitted significant Year-10 residential visual effects; NRW criticised photomontages
4. Ecological baseline deficiencies	TAN 5; Habitats Regs 2017; Environment (Wales) Act 2016 s6; LDP GN.37	3 Annex II bat species; 'Significant at County Level – Negative'; 5 designated sites not screened out; out-of-season/missing surveys; NRW 'likely to object'
5. Highway safety — unsuitable access	TAN 18; LDP GN.1; Future Wales P18(9)	CHA disputes traffic figures (~144 trips/day); visibility splays 94.7 m / 104.8 m below 120 m DMRB standard; residents' own count recorded 315 movements & 61 pedestrians in one day; survey done in school holidays on the wrong road
6. BESS fire & water-pollution risk	PPW Ed.12 (water/pollution); TAN 15; Future Wales P9	Battery may explode'; 'regular water will not be effective'; toxic HF/CO2; firewater containment deferred; site ~0.9 km upstream of Pembrokeshire Marine SAC; residents fear leaching to the Cleddau Estuary
7. Ground instability & coal-mining legacy	PPW Ed.12 (unstable land); LDP GN.1	Coal Authority confirms mine entries & surface hazards 'pose a potential risk to surface stability and public safety'; ~50 mine entries within 100 m; collapses recorded on the farm; Phase 2 investigation deferred
8. Residential amenity — noise & glint/glare	PPW Ed.12; TAN 11 (noise); LDP GN.1	Plant runs day & night (84 dB(A)); 0 dB headroom over background at nearest home; 100 Hz transformer hum with 0 dB penalty; 12 dwellings + A4076 left with residual glare

9. Heritage harm & overwhelming local opposition	PPW Ed.12 Ch.6; Historic Environment (Wales) Act 2016	Cadw 'have concerns'; admitted harm to Milford Haven Waterway Landscape of Outstanding Historic Interest; confirmed buried prehistoric archaeology; 48 of 55 respondents objected; all four community councils objected; every adjacent-owner response objects
10. Infrastructure		Applicant makes no mention of the wiring and infrastructure link between the Eastern array at Middle Hill, along the roads to the Western array and BESS at White House Farm. The inverter system required to make the DC to AC conversion is not shown. These systems create noise and require much water cooling, none of which has been identified.
11. Well-being of Future Generations	Well-being of Future Generations (Wales) Act	The development conflicts across all 7 well-being goals of the Well-being of Future Generations (Wales) Act: · Prosperous · Resilient · Healthier · More equal · Cohesive communities · Vibrant culture and thriving Welsh language · Globally responsible