

**From:** Williams, Arwel (ESNR - ERA - Land, Nature & Forestry)  
**Sent:** 20 April 2021 10:22  
**To:** Cate Barrow [Redacted S.40]; Kirk Hill [Redacted S.40]  
**Subject:** RE: URGENT - ADAS input to Planning Hearing

Kirk, many thanks for the call earlier,

*(Cate – for info)*

The link to the planning documents is at  
<https://dns.planninginspectorate.gov.uk/projects/Wales/Blackberry-Lane-Solar-Park/>

The main documents to focus on are: -

- For reference, the ALC survey of the site is in Annex A5.1 – Ian has validated and we have accepted the survey as accurate.
- The 'Agricultural Assessment Report' is a key document (Annex A5.2) – we would welcome a review of this by ADAS
- 'Alternative Site Assessment' (ES Vol 1 – Chapter 5)- again a view on this would be welcome against the BMV policy – is the search area adequate, is there lower quality land available and has the sequential (worst first) test been applied.
- 'Land Quality Implications' assessment (Doc B014)– this is a key one we need to counter the arguments being put forward that the development will not have any impact on soils and BMV land quality .
- Decommissioning (doc BL013) – again grateful of a view on this and the risks to the site during decommissioning (or potential abandonment/site not restored).

As background info, the following may be useful: -

- Hearing procedure letter from PINS – please see attached e-mail (*Ref: DNS 3245065*)
- My objection letter to the application – (*Ref: 2021-03-30 – DNS Application Response – Blackberry Lane Solar – LQAS Objection*)
- BMV Policy is covered in paragraph 3.58 and 3.59 of PPW 11 -  
[https://gov.wales/sites/default/files/publications/2021-02/planning-policy-wales-edition-11\\_0.pdf](https://gov.wales/sites/default/files/publications/2021-02/planning-policy-wales-edition-11_0.pdf)
- TAN 6 – Annex B covers the departmental remit on BMV -  
<https://gov.wales/sites/default/files/publications/2018-09/tan6-sustainable-rural-communities.pdf>
- Our guidance notes for the Predictive ALC map and advice on land quality is included at <https://gov.wales/agricultural-land-classification-predictive-map->

[guidance](#) and <https://gov.wales/agricultural-land-classification-frequently-asked-questions> and <https://gov.wales/agricultural-land-classification>

If there is anything else needed, please get back to me.

As discussed, we will need a quote (or a ball park) for Andrew to commission.

Once we have Legal support in place (this week hopefully) I will set up a call to discuss the approach to the case.

Happy to discuss

Arwel.

Arwel Wyn Williams

Cynghorydd Polisi Pridd a Defnydd Tir Amaethyddol / Agricultural Land Use & Soil Policy Advisor  
Is-adran Tir, Natur a Choedwigaeth / Land, Nature and Forestry Division

Llywodraeth Cymru / Welsh Government

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**From:** Williams, Arwel (ESNR - ERA - Land, Nature & Forestry)

**Sent:** 19 April 2021 12:13

**To:** Cate Barrow [Redacted S.40]

**Cc:** Williams, Martin (ESNR - ERA - Land, Nature & Forestry) [Redacted S.40]

**Subject:** URGENT - ADAS input to Planning Hearing

**Importance:** High

Hi Cate, hope all is well with you?

If you have 5 mins, grateful if we could have a quick call please. There is a planning case that we would welcome input from ADAS on. I have approached Andrew Chambers on this via AEA framework.

We have been invited to hearing sessions regarding our objection to a planning application for a solar development in Pembrokeshire. The development concerned is a DNS (Development of National Significance) and will be determined by Planning Inspectorate (PINS) not the Local Authority. The development involves a potential significant loss of BMV agri land (Grade 2).

**Requirement**

- We would like ADAS to review our objection, application documentation and provide us with a case statement to support our objection at hearing. A basis for the cases statement to be developed by ADAS is below (points 1 – 4).
- A link to the planning application documentation is at:  
<https://dns.planninginspectorate.gov.uk/projects/Wales/Blackberry-Lane-Solar-Park/>
- A copy of our Objection response to the case is also attached for information **[withheld - Sec.21 exemption – information accessible to applicant by other means]** (further correspondence details we submitted at pre-application stage can also be shared if needed)
- We are likely to require ADAS to attend the hearing session(s) – 1 to 2 days.
- We are exploring legal support on this case for input to case statement preparation and at hearing (should know in next few days if this is possible)
- If possible, looking at input from Ruth Metcalfe and Kirk Hill here if available – happy to discuss options.

We are on a tight timescale with this one, case statement will need to be submitted to PINS by 21<sup>st</sup> May (4 weeks) and the hearing is scheduled for 8<sup>th</sup> – 10<sup>th</sup> June (6 weeks).

Happy to discuss if you wish to give me a call today. As you can appreciate we need to move quickly on this one.

## **Best and Most Versatile Agricultural Land**

### **1. National Policy**

- a. Planning Policy Wales, Edition 11 (2021), and
- b. Technical Advice Note 6 – Planning for Sustainable Rural Communities (2010)

### **2. Site Selection Process**

- a. Adequacy of the search area for the proposed solar park
- b. Availability of alternative sites for the development of a solar park
- c. Justification for development on BMV agricultural land

### **3. The adequacy of the Land Quality Implications Assessment**

### **4. Decommissioning**

Regards

Arwel.

Arwel Wyn Williams

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The logo consists of the word 'CYMRAEG' written in a bold, black, sans-serif font. The letters are arranged in a circular pattern, with 'C' at the top, 'Y' on the left, 'M' at the bottom, and 'R', 'A', 'E', 'G' on the right. The letters are slightly overlapping and have a hand-drawn, textured appearance.