Report of: Principal Planning Officer - Strategic Policy

Subject: National Park Authority response to consultations on the Llŷr Floating Offshore Wind Farm project in the Celtic Sea.

Decision Required: Yes

Recommendation:

The National Park Authority is recommended to:

A. Agree the principles of the National Park Authority response to consultation on the consent required for the Llŷr Floating Offshore Wind Farm project and approve the response for submission to PEDW (see Appendix A).

1. Key Messages

This report seeks approval to submit the consultation response on the consent required for the Llŷr Floating Offshore Wind Farm project and approve the response for submission to PEDW.

2. Background

This report relates to the proposed Llŷr Wind project which is a demonstration floating offshore wind farm located approximately 35km south west off the Pembrokeshire Coast in the Celtic Sea.

Llŷr Floating Wind Ltd (the Applicant) has applied to the Welsh Ministers for consent under Section 36 of the Electricity Act 1989, to construct and operate an offshore generating station with deemed planning permission for the associated onshore transmission infrastructure under section 90(2) of the Town and Country Planning Act 1990.

A separate application under the Marine and Coastal Access Act 2009 has also been made to Natural Resources Wales Marine Licensing Team for a marine licence for the works to construct, operate and maintain the offshore operating station.

The application relates to the construction, operation and maintenance of the Llŷr 1 Floating Offshore Wind Farm (the proposed project), a development that will consist of the installation and operation of up to 10 floating wind turbine generators anchored to the seabed either via catenary spread or tensioned mooring systems. Each wind turbine generator will be up to 325.5m tip height and will be located circa 35km offshore southwest of Pembrokeshire. The proposed offshore area within which the floating wind turbines will be located covers an area of approximately 45km². The application includes associated offshore and onshore transmission cables and ancillary works necessary to export power from the wind turbine generators to the National Grid point of connection adjacent to Pembroke Power Station. An offshore

Pembrokeshire Coast National Park Authority National Park Authority – 26 March 2025 export cable approximately 55km in length will transport energy from the array area to landfall at freshwater West. Approximately 7.1km of buried onshore transmission cable will connect to a new onshore substation, located approximately 1.5km south of Pembroke Power Station.

Consideration has been given to the request for landscape enhancements to offset the adverse seascape, landscape and visual impacts of the proposed project. However, to be lawful, planning obligations should be necessary to make the development acceptable in planning terms and directly related to the development and fairly and reasonably related in scale and kind to the development. The onshore elements of the proposal are not considered to generate necessary mitigation because horizontal direct drilling is proposed. With regard to the visual impacts generated by the proposal, it is not considered practicable to mitigate these visual impacts at sea from the multiple National Park locations where there would be an impact. As such, landscape enhancements elsewhere in the National Park have not been suggested.

With regard to community benefits, it would be a matter for the developer to identify relevant communities and would not be directly related to the planning process. Paragraph 5.9.28 of Planning Policy Wales (Edition 12) notes that the Welsh Government supports the principle of securing financial contributions for host communities through voluntary arrangements. Such arrangements must not impact on the decision-making process and should not be treated as a material consideration, unless it meets the tests set out in Circular 13/97: Planning Obligations.

The officer-level response which is proposed to be submitted to Planning and Environment Decision Wales on behalf of the Pembrokeshire Coast National Park Authority is provided in draft in Appendix 1 to this report.

3. Legal Background

The proposed project is classed as EIA development under The Electricity Works (Environmental Impact Assessment) (England and Wales) Regulations 2017 (the 2017 EIA Regulations and The Marine Works (Environmental Impact Assessment) Regulations 2007 and so has been subject to an environmental impact assessment.

The Welsh Ministers have issued a notice under Regulation 39 of the 2017 EIA Regulations which confirms that EIA in respect of the Section 36 application does not need to be undertaken, as NRW are undertaking EIA in respect of the Marine License Application. An Environmental Statement (ES) has been produced to accompany the application for a Marine License which sets out the details of the proposal and presents an assessment of the environmental impacts.

4. Financial considerations

The Authority is a statutory consultee in relation to the Section 36 application and has also been consulted directly on the Marine Licence. The Authority in making representations on the applications should be able to substantiate their views. For example, if the Authority were to object to the proposal, this would likely trigger a public inquiry. It would be a reasonable expectation in this process that the Authority would provide expert witness evidence to substantiate our objection to the

Pembrokeshire Coast National Park Authority National Park Authority – 26 March 2025 development. This would have financial implications for the Authority in terms of instructing an expert witness(es) and employing an advocate. There will be limited financial implications if the Authority does not object to the proposal

5. Impact on our Public Sector Duties

5.1 Integrated Assessment Completed No

5.2 Welsh language Impacts

The impacts on the Welsh Language will form part of the decision on this project, both national policy in the form of the Welsh National Marine Plan (November 2019) and Planning Policy Wales (Edition 12, February 2024) contain clear requirements to take into account any impacts on the Welsh Language. The proposal is for an offshore windfarm and onshore works and no specific Welsh Language implications from this development have been identified that would need to be reflected in the Authority's representation.

5.3 Section 6 Biodiversity Duty and Carbon Emission Impacts

The project will contribute towards Welsh Government targets for renewable energy generation. It will be for the decision maker to balance the generation capacity against the impact on the National Park landscape and biodiversity, together with a range of other factors.

5.4 Equality, Socio- Economic Duty, Human Rights

The planning system seeks to progress legitimate aims by managing the development and use of land in the public interest to contribute to achieving sustainable development. It reconciles the needs of development and conservation, securing economy, efficiency, and amenity in the use of land, and protecting natural resources and the historic environment. Human rights under Articles 1 (right to peaceful enjoyment to property), 8 (right to respect for the home, private and family life) and 14 (right to equality), are the most relevant ones. Proportionality means that the measure which interferes with the right must strike a fair balance between the aim and the right which it interferes with. These considerations will largely be matters which the decision maker on the application will need to consider and would not be matters that the Authority would need to reflect in any representations on the project.

5.5 Well-being of Future Generations (Wales) Act

In preparing the draft response, full consideration has been given to the duties placed on Pembrokeshire Coast National Park Authority as a public body, by the Well-Being of Future Generations (Wales) Act 2015.

6. Conclusion

The decision maker is likely to take into account: the contribution a proposal will make to meeting Welsh, UK and European targets; the contribution to cutting greenhouse gas emissions; and the wider environmental, social and economic benefits and opportunities from renewable and low carbon energy development. The decision maker should also give significant weight to the Welsh Government's

targets to increase renewable and low carbon energy generation, as part of our overall approach to tacking climate change and increasing energy security.

Balanced against this there will remain some adverse residual impacts from the project, some of these are significant. The Authority has drawn attention in its representation to the need for the decision maker to fully consider if the judgements made in the Seascape and Landscape Visual Impact Assessment are correct and to secure effective mitigation as part of the development. It has also drawn attention to the extensive nature of adverse impacts to the National Park and whether this should, as a whole, be considered significant. Concerns have also been identified with some of the conclusions from the EIA in relation to impacts on the Special Qualities of the National Park and impacts on Landscape and Seascape Character.

7. Recommendation: Members are asked to:

Delegate to the Director of Place and Engagement to finalise a response to Planning and Environment Decisions Wales, with the Pembrokeshire Coast National Park Authority advising of concerns regarding some of the conclusions made in relation the adverse impact on the Special Qualities of the National Park and impacts on Landscape and Seascape Character.

8. List of background documents:

 Draft Consultation Response on the Llŷr Floating Offshore Wind Farm Project (Appendix A)

For any further information, please contact Gayle Lister via <u>gaylel@pembrokeshirecoast.org.uk</u>

APPENDIX A

Our Ref: NP/24/0647/OBS

Your Ref: CAS-01352-L3N2P8

28 February 2025

Planning and Environment Decisions Wales Crown Building Cathays Park Cardiff CF10 3NQ

Dear Sir / Madam,

Electricity Act 1989 – Section 36 The Electricity (Offshore Generating Stations) (Applications for Consent) (Wales) Regulations 2019 The Electricity Works (Environmental Impact Assessment) (England and Wales) Regulations 2017 The Marine Works (Environmental Impact Assessment) Regulations 2007

Application by: Llŷr Floating Wind Ltd

Proposed development: Up to 10 floating wind turbines up to 325.5 metres tip height each, located offshore southwest of Pembrokeshire, together with offshore and onshore transmission cables and ancillary works. The turbines will be anchored to the seabed either via catenary spread or tensioned mooring systems. The proposed offshore area within which the floating wind turbines will be located covers an area of approximately 45km². An offshore export cable will transport energy form the array area to landfall at Freshwater West. The buried onshore transmission cable will connect to a new onshore substation, located approximately 1.5km south of Pembroke Power Station, where it will connect to the National Grid Electricity Transmission Network.

INTRODUCTION

I write in response to the consultation regarding the made under Section 36 of the Electricity Act 1989. We were notified of this application, by the developer, at the end of November 2024. I trust that the below comments will be taken into consideration when determining the application.

LEGAL AND POLICY CONTEXT

The Environment Act 1995

Section 61 of the Environment Act 1995 sets out the statutory purposes of the National Park as follows: -

 To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park; and



Awdurdod Parc Cenedlaethol Arfordir Penfro Parc Llanion, Doc Penfro Sir Benfro SA72 6DY

Pembrokeshire Coast National Park Authority

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Rydym yn croesawu cael gohebiaeth yn Gymraeg, a byddwn yn ateb gohebiaeth yn Gymraeg. Na fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh, and will respond to any correspondence in Welsh. Corresponding in Welsh will not lead to delay. To promote opportunities for the public understanding and enjoyment of the special qualities of the National Park.

In accordance with Section 62(2) of the Environment Act, any relevant Authority shall have regard to National Park purposes when performing any functions in relation to, or so as to affect, land in a National Park. Relevant Authorities include public bodies, government departments, local authorities and statutory undertakers.

Local Planning Policy

Pembrokeshire Coast National Park Authority Local Development Plan 2 (2020) (PCNP LDP) is the development plan for the National Park. Section 4.6 of the LDP sets out that whilst the National Park is a landscape designation there are instances where strict application of the boundary in making decisions is not appropriate. As previously set out section 62(2) of the Environment Act (1995) places a duty on government bodies to have regard to the National Park. Section 4.6 of PCNP LDP identifies that in commenting on proposals outside the National Park it will use Policy 1 National Park Purposes and Duty (Strategy Policy) and this forms the basis of our comments on this application.

The Pembrokeshire Coast National Park Management Plan (2019) defines the special qualities of the National Park as:

- accessibility
- coastal splendour
- cultural heritage
- distinctive settlement character
- diverse geology
- diversity of landscape
- islands
- remoteness, tranquillity and wildness
- rich historic environment
- richness of habitats and species
- space to breathe
- the diversity of experiences and combination of individual qualities.

LDP Policy 8 sets out that the special qualities of the National Park must be conserved and enhanced. In particular, new development should ensure that the sense of remoteness and tranquillity is retained; that the pattern and diversity of the landscape is protected; the historic environment is protected; and that development on the undeveloped coast is avoided. In assessing the impact upon the special qualities of the National Park, matters of detail and cumulative impact will be given special consideration.

LDP Policy 9 states that proposals that are likely to result in a significant level of external lighting being emitted will be permitted where the lighting proposed relates to its purpose; and where there is no unacceptable adverse effect on the character of the area, local residents, vehicle users, pedestrians, biodiversity and visibility of the night sky. Wherever possible, opportunities to mitigate potential cumulative impacts on the night sky should be explored.

LDP Policies 10 and 11 seek to ensure that development proposals do not have an adverse effect on sites and species of European importance and of national importance respectively. LDP Policy 14 states that development will not be permitted where this would have an unacceptable adverse effect on the qualities and special landscape and seascape character of the National Park.

LDP Policy 30 states that development will not be permitted where it has an unacceptable adverse effect on amenity.

LDP Policy 33 states that renewable and low carbon energy development, including projects relating to wind, will be permitted subject to meeting the following criteria: Small and medium scale schemes would not individually or cumulatively have an unacceptable adverse effect on the visual amenities, landscape character and/or nature conservation value of the local area; large scale schemes would not individually or cumulatively have an unacceptable adverse effect on the special qualities of the National Park; onshore connections to offshore renewable energy generators would not have an unacceptable adverse effect on the visual amenities, landscape character or nature conservation of the developed and undeveloped coast. Where an undeveloped coastal location is required, proposals must demonstrate why the location is necessary with the least obtrusive approach to design being taken; all proposals will be required to demonstrate that measures have been taken to minimise impacts on the landscape and natural environment of the National Park and there will be no unacceptable impacts on residential amenity.

The development plan for the onshore application site is the Pembrokeshire Local Development Plan (2013) (PCC LDP). Particularly relevant to the consideration of impacts on the Pembrokeshire Coast National Park is policy GN.1 which states that development will only be permitted where it would not adversely affect landscape character, quality or diversity, including the special qualities of the Pembrokeshire Coast National Park and neighbouring authorities.

The impact of development on the special qualities of the National Park and the impact on the reasons for designating the National Park must therefore be considered within the scope of the Environmental Statement submitted in support of the application and taken into account when determining this planning application.

CONSIDERATION

The consideration of the National Park Authority has focussed on the environmental effects as a whole that are likely to have an impact on the Pembrokeshire Coast National Park, as described in the Environmental Statement.

The comments have been restricted to the main areas where it is considered that there is a likely significant environmental impact on the National Park, these relate primarily to the landscape and visual impact of the development, both for the proposal and potential cumulative impacts when considered in addition to and in combination with other existing and proposed developments. We have not commented on all other likely significant environmental impacts of the offshore development; any omission should not be considered as a view to the decision maker on whether we consider that other impacts exist or not.

Landscape and Visual Impact Assessment (Onshore development)

The Environmental Statement contains in Chapter 7 a Landscape and Visual Impact Assessment for the onshore element of the proposed development. The Authority agrees with the statement made at paragraph 7.69 that the construction of the Onshore Export Cable would result in limited and localised influence on physical attributes that contribute to the character of the PCNP and therefore make no further comment on this element of the development.

The onshore substation would be located within the substation compound of an area up to $15,000m^2$ (excluding SuDS), located 1.5km from the grid connection location. The substation itself would comprise of a building 93m wide, 63m in length and 15m in height.

Scope of assessment and methodology

Scope of assessment – The study area of 3km for landscape and visual effects are shown on the relevant figures along with the National Park boundary. The extent of the study area was agreed at scoping stage and the PCNPA agrees that the study area includes all receptors with the potential to experience significant effects.

The scope of the assessment includes all relevant receptors within the National Park including the Pembrokeshire Coast National Park as a whole, Landscape Character Areas (LCAs) and visual receptors and PCNPA agree with the outcome of the assessments (**Tables 1 and 2**). Cumulative impacts with consented developments and those at scoping stage are considered to be appropriate. Cumulative assessments from viewpoints within the National Park have been scoped out of the Cumulative Impact Assessment due to very limited or no visibility of the proposed development and /or all of the cumulative schemes, resulting in no potential for significant cumulative effects. Viewpoints were agreed with PCNPA at scoping stage, and it is considered that their exclusion from the Cumulative Impact Assessment is appropriate.

The scope includes effects during construction and operation. PCNPA's comments relate only to the operational phase of the development.

LVIA methodology –The LVIA methodology assessment criteria are set out fully in Appendix 7A of the Environmental Statement and accord with the guidelines in GLVIA3. All effects have been fully considered and PCNPA agrees with the outcome of the assessment (**Tables 1 and 2**).

Assessing effects on designated landscapes – There is no recognised methodology for undertaking an assessment of effects on the special qualities or statutory purposes of National Parks and GLVIA3 does not provide guidance on this subject. There is limited consideration given to the special qualities in the Landscape and Visual Impact Assessment and the overall assessment concludes that as substation would be located outside the PCNP, there would be a negligible adverse (not significant) effect on the special qualities and the Authority accepts this conclusion. It is considered that proposed landscaping would further mitigate any adverse effects.

Seascape Visual Impact Assessment (Offshore development)

The Environmental Statement contains in Chapter 23 a Seascape Landscape and Visual Impact Assessment (SLVIA) for the offshore element of the proposed development.

The offshore element of the proposed development comprises of 10 wind turbine generators (WTGs) of 325.5 metres to blade tip (177 metres to hub height) located 35km offshore in the Celtic Sea.

Scope of assessment and methodology

Scope of assessment – The study area of 45km from the outermost proposed WTGs for seascape, landscape and visual effects are shown on the relevant figures along with the National Park boundary. The extent of the study area was agreed at scoping stage and the PCNPA agrees that the study area includes all receptors with the potential to experience significant effects.

The scope of the assessment includes all relevant receptors within the National Park including the Pembrokeshire Coast National Park, Seascape Character Areas (SCAs) and visual receptors and PCNPA has reviewed and commented on the outcome of the assessments (**Tables 4 to 7**). Cumulative impacts with consented developments and those at scoping stage are considered to be appropriate. Viewpoints have been identified for both day and night and were agreed with PCNPA at scoping stage. The viewpoints are spread over the National Park and include 14 day time viewpoints (Viewpoint 15 from Lundy Island has not been reviewed by PCNPA) and 3 night time viewpoints. Overall, it is considered that the viewpoint number and selection is largely appropriate and proportionate for assessing areas where seascape, landscape and visual impacts may result in significant effects on the National Park for this proposed development and in addition to and in combination with other developments.

The scope includes effects during construction and operation. PCNPA's comments relate only to the operational phase of the development.

SLVIA methodology –The SLVIA methodology assessment criteria are set out fully in Appendix 23A of the Environmental Statement and accord with the guidelines in GLVIA3. All effects have been fully considered and PCNPA has reviewed the outcome of the assessment (**Tables 4 to 7**).

Assessment of Impacts on the Special Qualities of the Pembrokeshire Coast National Park

The SLVIA has identified the presence of the National Park, its special qualities and those relevant to the development. The assessment considered potential impacts on 'Coastal splendour'; 'Diversity of Landscape'; 'Islands'; 'Space to Breathe'; 'Remoteness, tranquillity and wildness' and 'Diversity and combination of special qualities'.

The assessment concludes that the proposed development would have minor adverse effect on all special qualities considered, with the exception of 'Space to breathe' which is assessed as resulting in a negligible adverse effect. The Authority accepts the outcomes relating to 'Diversity of landscape', 'Space to breathe' and 'Diversity and combination of special qualities'. However, the assessments relating to 'Coastal splendour', 'Islands' and 'Remoteness, tranquillity and wildness' are not agreed. For each of those special qualities the Authority considers the magnitude of impact to be medium rather than small, resulting in a moderate adverse effect rather than a small adverse effect. This would result in a **significant** effect for those special qualities. The reasoning is explained in **Table 3**.

The Authority does not agree that the assessment of special qualities supports the statement at paragraph 12 of the SLVIA detailed assessment (Appendix 23C): 'Potential change would be limited to the perceptual qualities, such as the sense of remoteness, tranquillity, wildness and dark skies experienced in parts of the PCNP. The impression of change on these perceptual attributes would generally be limited by the considerable intervening distance and clear separation provided by expansive areas of open seascape, and the small part of the broad seascape setting of the PCNP by the proposed Project. On balance the magnitude of impact on the part of the PCNP within the Study Area and ATV extent would be small'. Whilst it is agreed that intervening distance and localised impact would limit the impression of change, the adverse effect on a number of special qualities would increase the significance of the effects.

Assessment of Impacts on Seascape / Landscape Character

A detailed assessment of five Seascape Character Areas (SCAs): SCA25 Skomer Island and Marloes Peninsula, SCA26 Skokholm and Gateholm Coastal Waters, SCA31 Outer Milford Haven, SCA34 Freshwater West and SCA35 Castlemartin Coastal Waters. In addition, impacts on five Landscape Character Areas (LCAs) were also assessed: LCA6 Castlemartin / Merrion Ranges, LCA7 Angle Peninsula, LCA8 Freshwater West / Brownslade Burrows, LCA9 Marloes Peninsula and LCA10 Skomer and Skokholm. In all areas the significance of effects has been judged to be minor adverse and not significant. The PCNPA agree with and accept the assessment (**Table 4**).

Assessment of Impacts on Seascape Visual Amenity

A detailed assessment of the potential impacts on seascape visual amenity has been carried out from 14 viewpoints. PCNPA agree with the outcome of the assessment from viewpoints 2 (Skokholm Island), 3 (Pembroke to Rosslare Ferry), 10 (Castlemartin Range Trail), 13 (Manorbier Beach) and 14 (Caldey Island). Each of these is judged to have either negligible adverse or minor adverse effects which are not significant. However, from viewpoints 1 (Skomer Island), 4 (Marloes Beacon), 5 (Hoopers Point), 6 (St Ann's Head), 7 (Lindsway Bay, 8 (Castles Bay / Sheep Island), 9 (Freshwater West Beach), 11 (Elegug Stacks) and 12 (St Govan's Head), it is considered that the significance of the effects are widespread and adverse. From each of these viewpoints the proposed turbines would introduce development which would result in a noticeable change to an important part of the view experienced from those viewpoints resulting in a medium magnitude of change and a moderate adverse effect which is **significant.** The reasoning is explained in **Table 5**.

Night-time Visual Assessment

The night-time assessment follows the same key steps as that of the overall SLVIA and the methodology is accepted as following the guidelines in GLVIA3. The assessment focusses on the potential visual impacts resulting from the aviation lighting which is a statutory requirement of offshore wind farms of 60m or greater. The impacts have been assessed from 3 viewpoints within the National Park and were agreed with the PCNPA at scoping stage.

All effects have been appropriately considered, and the Authority agrees with the outcome of the assessment **(Table 6)**.

Assessment of Cumulative Impacts on Landscape / Seascape Character and Visual Amenity

Eight projects were identified as potentially having cumulative impacts with the proposed development. 4 of these are existing / operational or consented, 2 are at application stage and a further 2 are at scoping or pre-application stage. The assessment has been presented as 3 cumulative scenarios: Scenario 1 considers the proposed project introduced into a baseline which includes consented and operational wind farms; Scenario 2 which includes those at application stage in addition to consented and existing schemes and Scenario 3 which considers the proposed development in a baseline that includes all 8 projects.

The assessment has included the significance of effect on the Pembrokeshire Coast National Park, the Seascape and Landscape Character, the impact on visual amenity from the 14 viewpoints and the night-time viewpoints. This is considered to be a comprehensive and appropriately undertaken cumulative assessment.

The assessment, in all scenarios and from all viewpoints, has judged the significance of cumulative impact to be minor adverse and not significant. With the exception of viewpoint 7 (Lindsway Bay), the Authority disagrees with the outcomes of the Cumulative Impact Assessment and considers that there would be a moderate adverse effect which is considered **significant**. The reasoning is shown in **Table 7**.

The National Park Authority has noted Policy SOC_06 of the Welsh National Marine Plan, which states:

"SOC_06: Designated Landscapes

Proposals should demonstrate how potential impacts on the purposes and special qualities for which National Parks or Areas of Outstanding Natural Beauty have been designated have been taken into consideration and should, in order of preference:

- a. avoid adverse impacts on designated landscapes; and/or
- b. minimise impacts where they cannot be avoided; and/or
- c. mitigate impacts where they cannot be minimised.

If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding.

Archaeology considerations

Onshore:

- The only onshore environmental assessment we could find for the historic environment related to the report from DAT dating to 2021. This was not commissioned for the current proposal, therefore needs to be recommissioned. This should include the impact of the cable and substation on any identified features within the study area, including their setting. Field surveys should also be carried out walkover and geophysics were applicable. During the 2021 study by DAT, all Wales lidar was not available. This is now available and should be used as part of the new work.
- The location of the scheduled monument known as PE020 appears to be within the cable route and is near infrastructure associated with the development. This will need to be avoided, and its setting protected. This will need careful consideration and discussions with Cadw as the agency responsible for the management of scheduled monuments.
- The consultation suggests that the potential to use the same route as the Greenlink cable is not a preferred option. However, using this route could be beneficial to the historic environment as impactful work has already happened with this development rather than targeting a new area. Can this be reconsidered as an option?
- It would be beneficial to use the data relating to theoretical zones of visibility and apply it to the historic environment features as part of an assessment of the impact of the proposal on these. Equally, this could apply in relation to the registered historic landscape within the northern section of the development i.e. Milford Haven Waterway.
- The updated study should include recommendations on mitigation/work programme in relation to the historic environment if work commences.
- Known features should be avoided.

Offshore:

- As per the recommendation by Coracle Archaeology, additional geophysics to cover gaps in the revised area should be commissioned and evaluated. This should be of appropriate resolution level to meet the needs of the survey.
- The survey noted that certain features were not picked up due to likely accumulation of sand, this indicates that a watching brief will need to be put in place if the development proceeds to mitigate against the discovery of known and unknown features. Coracle Archaeology have indicated that there is a moderate risk of further discoveries on the beach. As per their suggestion, a mitigation work programme will need to be put in place and agreed with the relevant bodies/organisations.
- The all Wales lidar data should be utilised to identify if any features that have not yet been identified are detected in this data source.
- The updated study should include recommendations on mitigation/work programme in relation to the historic environment if work commences.
- Known features should be avoided.

Ecology and Biodiversity

Terrestrial Ecology and Biodiversity

Throughout Chapter 8 there is reference to the limited surveys undertaken due to a few limiting factors. The confirmation of further survey works is welcome, including those for bats, dormice and badgers. Comments are mindful of preexisting consultations with the PCC and PCNPA planning ecologist. Particularly those conversations around the acceptability of surveys and proposing 'worst case scenario' mitigation in light of these gaps. The Authority agrees with what has been suggested and put forward for the worst case scenarios planning.

The mitigation proposed is welcome and provided works are in accordance with these measures there is unlikely to be any significant impact upon protected species. There is a concern regarding permanent lighting at the onshore substation that may cause disturbance, not limited to badger, bat and dormouse. The lighting may illuminate hedgerows, scrub and the woodland adjacent to the substation causing loss of foraging and commuting routes. Screening planting has been proposed to prevent this light spill. Providing sufficient screening is in place to minimise this spill then there is unlikely to be a significant impact, it is important that a full external lighting plan and details are submitted.

The cumulative effects of hedgerow removal with the number of developments occurring simultaneously on this peninsula would lead to fragmentation of dormouse habitat which, as concluded in 8.11.3 would be permanent, moderate adverse and significant.

Three projects (Erebus, Greenlink and Valorous) conclude that the impacts on dormice will not be significant, as each individual project will only result in localised areas of habitat loss. When considered in combination with each other, and Pembroke Power Station Hydrogen Electrolyser, Battery energy storage system at Pembroke Power Station and Proposed Battery Energy Storage System Hundleton, and this proposed project, widespread disturbance, habitat loss and fragmentation is likely to occur which is considered a **permanent**. **moderate adverse and significant impact on dormice**. It has been proposed that it may be possible to combine some of the vegetation clearance if cable routes are shared; this would be favourable. If not, then to prevent large areas of suitable dormouse habitat being removed at once it is important that mitigation from the approved projects are in place before further removal of habitat.

Suitable habitat for reptiles is present throughout the onshore development area. They were scoped out of the assessment as it was noted that loss of suitable habitat will be temporary and minimal. Any loss of suitable habitat should be mitigated – particularly where hedge banks are to be removed.

The green infrastructure statement addresses net benefit for biodiversity as required under the Environment (Wales) Act 2016. One point of the suggested net benefit is to *improve existing habitats to increase their species diversity and ecological resilience for example, planting new locally native species within areas of removed hedgerow and establishing species-rich grassland in place of improved grassland'.* It is suggested that when finalising the scheme for hedgerow planting for dormouse and bats, the enhancement schemes for Green link substation and Erebus should be considered to increase habitat connectivity and decrease landscape fragmentation.

Offshore Ornithology

The Authority is aware that the RSPB have concerns regarding the surveys for baseline population density of Manx shearwaters, species identification and the potential for collision impact due to light-induced disorientation. As Pembrokeshire is home to over half the world's population of Manx shearwaters and their status as qualifying features of the Skomer, Skokholm and the Seas off Pembrokeshire Special Protection Area (SPA), the Authority would like to see the concerns raised in their responses fully considered and appropriately addressed.

Kittiwake are another qualifying feature of the Skomer, Skokholm and the Seas off Pembrokeshire SPA. PCNPA are concerned with the figure from RSPB that after the lifetime of the development, the population size is forecast to decline. It is predicted that should the development go ahead, the decline would see an annual population between 77.15 and 85.4% of the current predicted estimates for population size. Primarily, through the collision and distributional changes associated with Mona OWF. We support RSPB's comments to have this considered in the Habitats Regulation Assessment.

The Authority note that other marine and benthic impacts have been considered in the Environmental Statement, these are linked to the special qualities of a coastal National Park. The Authority would request that full consideration is given to the potential impacts identified and would expect NRW to fully consider and address impacts in their determination of the marine licence application.

CONCLUSION

It is noted that the proposed development would contribute to Wales' renewable energy targets, however, it is the National Park Authority view that, while individually some impacts may not be considered as significant, there are adverse effects across a large area of the National Park. The Authority considers that the magnitude and significance of effects has been downgraded resulting in a reductive assessment.

As such, The Pembrokeshire Coast National Park Authority **has concerns** relating to the reductive assessment. It is the view of the Authority that adverse effects on the National Park seascape, landscape and special qualities would result from the proposed development that cannot be mitigated.

Yours faithfully

Gayle Lister MRTPI

Principal Planning Officer (Strategic Policy)

Table 1: Review of Impacts on Landscape Character (Onshore Substation)
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PCNPA Landscape Character Areas	Name	Sensitivity	Magnitude	Significance of effect	Additional Mitigation	PCNPA Comment
Pembrokeshire Coast National Park		High	Negligible	Negligible (adverse)	None required	Sensitivity: agreed Magnitude: agreed Significance: agreed
LCA 6	Castlemartin / Merrion Ranges	High	Negligible	Negligible (adverse)	None required	Sensitivity: agreed Magnitude: agreed Significance: agreed
LCA 7	Angle Peninsula	High	Negligible	Negligible (adverse)	None required	Sensitivity: agreed Magnitude: agreed Significance: agreed
LCA 8	Freshwater West / Brownslade Burrows	High	Negligible	Negligible (adverse)	None required	Sensitivity: agreed Magnitude: agreed Significance: agreed

Viewpoints Location Sensitivity Magnitude Significance Additional PCNPA Comment of effect Mitigation VP A B4320 The High Negligible Negligible Sensitivity: agreed None Burrows (adverse) required (Freshwater Magnitude: agreed West) Significance: agreed VP B Minor Road Medium Small Minor None Sensitivity: agreed South of (adverse) required Magnitude: agreed Rhoscrowther Significance: agreed VP C Medium Negligible Sensitivity: agreed Pembrokeshire Negligible None Coast Path -(adverse) required Pwllcrochan Magnitude: agreed Significance: agreed VP D B4320 High Small Minor Sensitivity: agreed None Wogaston (adverse) required Magnitude: agreed – whilst the proposed onshore substation would be visible from this viewpoint, it is unlikely to distract from the existing focus. It is accepted that the visual impact will also be reduced by 15 years as proposed landscaping matures.

Table 2: Review of Impacts on Visual Amenity (Onshore Substation)

					Significance: agreed
Pembrokeshire	High	Negligible	Negligible	None	Sensitivity: agreed
Coast Path National Trail			(adverse)	required	Magnitude: agreed
					Significance: agreed

Table 3: Review of Impacts on Special Qualities

Special Quality	Sensitivity	Magnitude	Significance of effect	PCNPA Comment
Coastal splendour	High	Small	Minor	Sensitivity: agreed
			adverse	
				Magnitude: not agreed – whilst located 35km from the
				Pembrokeshire Coast National Park, the WTGs would be visible
				from a number of viewpoints and will result in a partial alteration to the seascape/landscape receptor. It is accepted that the
				impact on coastal splendour will be localised, however, for the
				area where there will be an impact, PCNPA consider the
				magnitude to be Medium.
				Significance of effect: not agreed – a change of magnitude to medium would result in a moderate adverse effect which is
				considered significant.
Diversity of	High	Small	Minor	Sensitivity: agreed
landscape	U		adverse	
				Magnitude: agreed
				Significance: agreed
Islands	High	Small	Minor	Sensitivity: agreed
	Ŭ		adverse	
				Magnitude: not agreed – whilst it is agreed that there is
				considerable intervening distance and separation between the
				mainland and the islands, the introduction of the WTGs into the
				seascape will have a visual impact on views both towards the

				 islands and from the islands which would have an impact on the sense of remoteness and place. PCNPA consider the magnitude to be Medium. Significance of effect: not agreed – a change of magnitude to medium would result in a moderate adverse effect which is considered significant.
Space to breathe	High	Negligible	Negligible adverse	Sensitivity: agreed Magnitude: agreed Significance: agreed
Remoteness, tranquillity and wildness	High	Small	Minor adverse	 Sensitivity: agreed Magnitude: not agreed – whilst it is agreed that the visual impact may be localised, the introduction of the WTGs into the views experienced from Freshwater West and the islands would change the sense of remoteness and wildness and therefore PCNPA consider the magnitude to be Medium. Significance of effect: not agreed – a change of magnitude to medium would result in a moderate adverse effect which is considered significant.
Diversity and combination of special qualities	High	Small	Minor adverse	Sensitivity: agreed Magnitude: agreed Significance: agreed

Table 4: Review of Impacts on Seascape / Landscape Character

PCNPA Seascape Character Areas	Name	Sensitivity	Magnitude	Significance of effect	PCNPA Comment
SCA 25	Skomer Island and Marloes Peninsula	High	Small	Minor adverse	Sensitivity: agreed Magnitude: agreed Significance: agreed
SCA 26*	Skokholm and Gateholm Coastal Waters	High	Small	Minor adverse	Sensitivity: agreed Magnitude: agreed Significance: agreed
SCA31	Outer Milford Haven	High	Negligible	Minor adverse	Sensitivity: agreed Magnitude: agreed Significance: agreed
SCA34	Freshwater West	High	Small	Minor adverse	Sensitivity: agreed Magnitude: agreed Significance: agreed
SCA35	Castlemartin Coastal Waters	High	Small	Minor adverse	Sensitivity: agreed Magnitude: agreed

					Significance: agreed
LCA6	Castlemartin / Merrion Ranges	High	Small	Minor adverse	Sensitivity: agreed
	rangee				Magnitude: agreed
					Significance: agreed
LCA7	Angle Peninsula	High	Small	Minor adverse	Sensitivity: agreed
					Magnitude: agreed
					Significance: agreed
LCA8	Freshwater West / Brownslade Burrows	High	Small	Minor adverse	Sensitivity: agreed
					Magnitude: agreed
					Significance: agreed
LCA9	Marloes Peninsula	High	Small	Minor adverse	Sensitivity: agreed
					Magnitude: agreed
					Significance: agreed
LCA10	Skomer and Skokholm	High	Small	Minor adverse	Sensitivity: agreed
					Magnitude: agreed
					Significance: agreed

*Please note that the SLVIA states this is SCA 27 which is incorrect.

Table 5: Review of Impacts on Seascape Visual Amenity

Viewpoints	Location	Sensitivity	Magnitude	Significance of effect	PCNPA Comment
VP 01	Skomer Island	High	Small	Minor adverse	Sensitivity: agreed
					 Magnitude: not agreed – the proposed turbines would introduce development which would result in a noticeable change to an important part of the view. Whilst it is agreed that distance would reduce some visual impact, it is likely to distract from the existing focus. PCNPA consider the magnitude to be medium. Significance of effect: not agreed – a change of magnitude to medium would result in a moderate adverse effect which is considered
VP 02	Skokholm Island	High	Small	Minor adverse	significant. Sensitivity: agreed
					Magnitude: agreed
					Significance: agreed
VP 03	Pembroke to Rosslare Ferry	High	Small	Minor adverse	Sensitivity: agreed
					Magnitude: agreed
					Significance: agreed
VP 04	Marloes Beacon	Very High	Small	Minor adverse	Sensitivity: agreed

					 Magnitude: not agreed – the proposed turbines would introduce development which would result in a noticeable change to an important part of the view. Whilst it is agreed that distance would reduce some visual impact, it is likely to distract from the existing focus. Of particular concern is that the turbines are not seen as a whole, with the blades most visible and not in the context of whole turbines. PCNPA consider the magnitude to be medium. Significance of effect: not agreed – a change of magnitude to medium would result in a moderate adverse effect which is considered significant.
VP 05	Hooper's Point	High	Small	Minor adverse	 Sensitivity: agreed Magnitude: not agreed – the proposed turbines would introduce development which would result in a noticeable change to an important part of the view. Whilst it is agreed that distance would reduce some visual impact, it is likely to distract from the existing focus. PCNPA consider the magnitude to be medium. Significance of effect: not agreed – a change of magnitude to medium would result in a moderate adverse effect which is considered significant.

VP 06	St Ann's Head	High	Small	Minor adverse	Sensitivity: agreed
					Magnitude: not agreed – the proposed turbines would introduce development which would result in a noticeable change to an important part of the view. Whilst it is agreed that distance would reduce some visual impact, it is likely to distract from the existing focus. PCNPA consider the magnitude to be medium.
					Significance of effect: not agreed – a change of magnitude to medium would result in a moderate adverse effect which is considered significant.
VP 07	Lindsway Bay	High	Small	Minor adverse	Sensitivity: agreed
					Magnitude: not agreed – the proposed turbines would introduce development which would result in a noticeable change to an important part of the view. Whilst it is agreed that distance would reduce some visual impact, it is likely to distract from the existing focus. Of particular concern is that the turbines are not seen as a whole, with the blades most visible and not in the context of whole turbines. PCNPA consider the magnitude to be medium .
					Significance of effect: not agreed – a change of magnitude to medium would result in a moderate adverse effect which is considered significant.

VP 08	Castles Bay / Sheep Island	High	Small	Minor adverse	 Sensitivity: agreed Magnitude: not agreed – the proposed turbines would introduce development which would result in a noticeable change to an important part of the view. Whilst it is agreed that distance would reduce some visual impact, it is likely to distract from the existing focus. PCNPA consider the magnitude to be medium. Significance of effect: not agreed – a change of magnitude to medium would result in a moderate adverse effect which is considered significant.
VP 09	Freshwater West Beach	Very High	Small	Minor adverse	Sensitivity: agreed Magnitude: not agreed – the proposed turbines would introduce development which would result in a noticeable change to an important part of the view. Whilst it is agreed that distance would reduce some visual impact, it is likely to distract from the existing focus. PCNPA consider the magnitude to be medium. Significance of effect: not agreed – a change of magnitude to medium would result in a moderate adverse effect which is considered significant.

VP 10	Castlemartin Range Trail	Medium	Small	Minor adverse	Sensitivity: agreed Magnitude: agreed
VP 11	Elegug Stacks	High	Small	Minor adverse	Significance: agreed Sensitivity: agreed Magnitude: not agreed – the proposed turbines would introduce development which would result in a noticeable change to an important part of the view. Whilst it is agreed that distance would reduce some visual impact, it is likely to distract from the existing focus. PCNPA consider the magnitude to be medium. Significance of effect: not agreed – a change of magnitude to medium would result in a moderate adverse effect which is considered significant.
VP 12	St Govan's Head	High	Small	Minor adverse	Sensitivity: agreed Magnitude: not agreed – the proposed turbines would introduce development which would result in a noticeable change to an important part of the view. Whilst it is agreed that distance would reduce some visual impact, it is likely to distract from the existing focus. PCNPA consider the magnitude to be medium.

					Significance of effect: not agreed – a change of magnitude to medium would result in a moderate adverse effect which is considered significant.
VP 13	Manorbier Beach	High	Negligible	Negligible adverse	Sensitivity: agreed Magnitude: agreed Significance: agreed
VP 14	Caldey Island	Very High	Negligible	Negligible adverse	Sensitivity: agreed Magnitude: agreed Significance: agreed
Pembrokeshire Coast Path		High	Small	Minor adverse	Sensitivity: agreed Magnitude: not agreed – the proposed turbines would introduce development which would result in a noticeable change to an important part of the view experienced from the coast path. Whilst it is agreed that distance would reduce some visual impact, it is likely to distract from the existing focus from a number of stretches of the coast path. PCNPA consider the magnitude to be medium. Significance of effect: not agreed – a change of magnitude to medium would result in a moderate adverse effect which is considered significant.

Table 6: Review of Nighttime Assessment

	Location	Sensitivity	Magnitude	Significance of effect	PCNPA Comment
VP N1	Martins Haven Car Park	Very High	Small	Minor adverse	Sensitivity: agreed
					Magnitude: agreed
					Significance: agreed
VP N2	Kete Car Park	Very High	Small	Minor adverse	Sensitivity: agreed
					Magnitude: agreed
					Significance: agreed
VP N3	Freshwater West Beach	High	Small	Minor adverse	Sensitivity: agreed
					Magnitude: agreed
					Significance: agreed

Table 7: Review of Cumulative Impacts on Landscape / Seascape Character

PCNPA Landscape /Seascape Character Areas	Name	Sensitivity	Magnitude	Significance of effect	PCNPA Comment
Pembrokeshire Coast National Park		High	Cumulative Scenario 1: Small Cumulative Scenario 2: Small Cumulative Scenario 3: Small	 1:Minor adverse (not significant) 2: 1:Minor adverse (not significant) 3: 1:Minor adverse (not significant) 	Sensitivity: agreed Magnitude: not agreed – in each of the scenarios the proposed development would be seen in addition to and in combination with existing and/or consented, and/or projects at scoping stage. The proposed project would introduce further offshore development which would result in a perceptible change to the Pembrokeshire Coast National Park landscape and seascape. PCNPA consider that the magnitude would be at least Medium. Significance of effect: not agreed – a change of magnitude to medium would result in at least a moderate adverse effect which is considered significant.
Seascape and Landscape Character		High	Cumulative Scenario 1: Small Cumulative Scenario 2: Small	1:Minor adverse (not significant)	Sensitivity: agreed Magnitude: not agreed – in each of the scenarios the proposed development would be seen in addition to and in combination

			Cumulative Scenario 3: Small	2: 1:Minor adverse (not significant)3: 1:Minor adverse (not significant)	with existing and/or consented, and/or projects at scoping stage. The proposed project would introduce further offshore development which would result in a perceptible change to the Pembrokeshire Coast National Park landscape and seascape. PCNPA consider that the magnitude would be at least Medium . Significance of effect: not agreed – a change of magnitude to medium would result in at least a moderate adverse effect which is considered significant .
Viewpoints 01- 06 and 08	Skomer, Skokholm and the Marloes, Dale and Angle Peninsulas	High (VP 04 – Very High)	Cumulative Scenario 1: Small Cumulative Scenario 2: Small Cumulative Scenario 3: Small	 1:Minor adverse (not significant) 2: 1:Minor adverse (not significant) 3: 1:Minor adverse (not significant) 	Sensitivity: agreed Magnitude: not agreed – in each of the scenarios the proposed development would be seen in addition to and in combination with existing and/or consented, and/or projects at scoping stage. The proposed project would introduce further offshore development which would result in a perceptible change to the views experienced from the Pembrokeshire Coast National Park as shown in the cumulative wirelines. Whilst it is accepted views would be localised and not Park wide, PCNPA do not agree that offshore wind farms would not become a prominent feature. PCNPA consider that the magnitude would be at least Medium.

					Significance of effect: not agreed – a change of magnitude to medium would result in at least a moderate adverse effect which is considered significant.
VP 07	Lindsway Bay	High	Cumulative Scenario 1: Little to no visibility Cumulative	3: Minor adverse (not significant)	Sensitivity: agreed Magnitude: agreed Significance: agreed
			Scenario 2: Little to no visibility Cumulative Scenario 3: Small		
VP 09	Freshwater West	Very High	Cumulative Scenario 1: Small	1:Minor adverse (not significant)	Sensitivity: agreed
			Cumulative Scenario 2: Small Cumulative Scenario 3: Small	2: 1:Minor adverse (not significant)3: 1:Minor adverse (not significant)	Magnitude: not agreed – in each of the scenarios the proposed development would be seen in addition to and in combination with existing and/or consented, and/or projects at scoping stage. The proposed project would introduce further offshore development which would result in a perceptible change to the views experienced from the Pembrokeshire Coast National Park as shown in the cumulative wirelines. Whilst it is accepted views would be localised and not Park wide, PCNPA do not agree that offshore wind farms would not become a

					prominent feature. PCNPA consider that the magnitude would be at least Medium . Significance of effect: not agreed – a change of magnitude to medium would result in at least a moderate adverse effect which is considered significant .
VPs 10-12	Castlemartin, Elegug Stacks and St Govan's Head	High (VP 10 Medium)	Cumulative Scenario 1: Small Cumulative Scenario 2: Small Cumulative Scenario 3: Small	 1:Minor adverse (not significant) 2: 1:Minor adverse (not significant) 3: 1:Minor adverse (not significant) 	Sensitivity: agreed Magnitude: not agreed – in each of the scenarios the proposed development would be seen in addition to and in combination with existing and/or consented, and/or projects at scoping stage. The proposed project would introduce further offshore development which would result in a perceptible change to the views experienced from the Pembrokeshire Coast National Park as shown in the cumulative wirelines showing a line of turbines along the horizon. Whilst it is accepted views would be localised and not Park wide, PCNPA do not agree that offshore wind farms would not become a prominent feature. PCNPA consider that the magnitude would be at least Medium. Significance of effect: not agreed – a change of magnitude to medium would result in at least a moderate adverse effect which is considered significant.

VP 13	Manorbier Beach	High	Cumulative Scenario 1: Little to no visibility Cumulative Scenario 2: Little to no visibility Cumulative Scenario 3: Negligible	3: Negligible adverse (not significant)	Sensitivity: agreed Magnitude: not agreed - The proposed project would introduce further offshore development which would result in a perceptible change to the views experienced from the Pembrokeshire Coast National Park as shown in the cumulative wirelines. PCNPA consider that the magnitude would be at least Small. Significance of effect: not agreed – a change of magnitude to small would result in at least a minor adverse effect. It is agreed that this is not considered significant.
VP 14	Caldey Island	No Cumulati	ve Assessment carried	l out.	
VP N1	Martin's Haven Car Park	Very High	Cumulative Scenario 1: Small Cumulative Scenario 2: Small Cumulative Scenario 3: Small	 1:Minor adverse (not significant) 2: 1:Minor adverse (not significant) 3: 1:Minor adverse (not significant) 	Sensitivity: agreed Magnitude: not agreed – in each of the scenarios the proposed development would add additional lighting Whilst it is accepted that the intervening distance would limit the sense of cumulative change, additional light would have an adverse impact on the dark skies at this location when looking out to sea. PCNPA consider that the magnitude would be at least Medium when lights were not operating in the low intensity mode (200cd).

VP N2	Kete Car	Very High	Cumulative	1:Minor	Significance of effect: not agreed – a change of magnitude to medium would result in at least a moderate adverse effect which is considered significant. Magnitude: not agreed – in each of the
	Park		Scenario 1: Small Cumulative Scenario 2: Small Cumulative Scenario 3: Small	adverse (not significant) 2: 1:Minor adverse (not significant) 3: 1:Minor adverse (not significant)	scenarios the proposed development would add additional lighting Whilst it is accepted that the intervening distance would limit the sense of cumulative change, additional light would have an adverse impact on the dark skies at this location when looking out to sea. PCNPA consider that the magnitude would be at least Medium when lights were not operating in the low intensity mode (200cd). Significance of effect: not agreed – a
					change of magnitude to medium would result in at least a moderate adverse effect which is considered significant .
VP N3	Freshwater West	High	Cumulative Scenario 1: Small Cumulative Scenario 2: Small Cumulative Scenario 3: Small	1:Minor adverse (not significant) 2: 1:Minor adverse (not significant)	Magnitude: not agreed – in each of the scenarios the proposed development would add additional lighting Whilst it is accepted that the intervening distance would limit the sense of cumulative change, additional light would have an adverse impact on the dark skies at this location when looking out to sea. PCNPA consider that the magnitude would be at least Medium when lights were not

		3: 1:Minor	
		adverse (not	Significance of effect: not agreed – a
		significant)	change of magnitude to medium would result
			in at least a moderate adverse effect which
			is considered significant .