



**Ymddiriedolaeth  
Genedlaethol  
National Trust**

Linell uniongyrchol / Direct line:

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By email PEDW.Infrastructure@gov.wales

**RESPONSE BY NATIONAL TRUST TO THE SUBMITTED DEVELOPMENT OF NATIONAL SIGNIFICANCE, RHOSCROWTHER WIND FARM LIMITED, RHOSCROWTHER, PEMBROKESHIRE**

**1. Background**

1.1 National Trust considers that Climate Change poses the single biggest threat to the places we look after. We are already actively adapting to and managing coastal change and the impacts of severe weather on many of our places. We also acknowledge that whilst we need to continue to reduce and decarbonise our own energy use, we also need to support the rest of the country to do the same. If the UK is to achieve net zero emissions by 2050 (or 2045 which the National Trust has called for), then major expansion in renewable energy will be required.

1.2 The National Trust (NT) acknowledges that larger scale renewable projects are now required to meet the country's net zero targets, and to reduce carbon emissions to halt climate change.

1.3 We welcome renewable schemes that are holistically designed to consider the effects on the environment including wildlife, landscape, seascape, and cultural heritage.

1.4 We do not consider that Rhoscrowther is a scheme that we can support. We consider that in making a planning balance, the harm on the landscape is not outweighed by the contribution it will make to renewable energy generation. As such we would look to the Planning Inspector to refuse the application for three turbines and place the landscape protection policies of the National Park at a greater weight than those supporting on shore renewable energy generation.

1.5 The consideration of National Trust is based the considerable deliberation of previous schemes in this area, the detailed assessment for the current proposal, and the recent developments and likely offshore Celtic Sea offshore wind projects and the contribution this will make to renewable energy in SW Wales. Our views are outlined in detail below.

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## **2.The Principle of a Wind Farm at Rhoscrowther**

2.1 We think it is important to consider the views of the previous Inspector at Rhoscrowther, particularly the importance of the landscape and the potential impact of wind turbines into this pastoral scene. Much of the commentary and consideration is still pertinent. We have highlighted a number of paragraphs in our considerations below.

2.2 We appreciate that “this decision-taking is consequently not pre-determined by the decision on the earlier scheme for a different number of turbines, of different height with different generating capacity, and determined against a different policy context” (Para 1.6 of the submitted Planning Statement). However, we consider the Inspector identified fundamental characteristics of wind turbine development in the proposed landscape which transfer into the deliberation of the current scheme. Particularly with the larger blade tip turbines brought forward in the subject development.

2.3 Para 39 of the Inspectors Report discussed the principle of the project. The proposed turbines would introduce an array of prominent and large-scale man-made structures into the narrow wedge of pastoral landscape between the Valero refinery and the National Park. Due to the number and height of the turbines and the diameter spread of the moving blades the wind farm would be a prominent and distracting feature in the landscape. I do not consider that the visual characteristics of the proposed development would have a complementary or consolidating relationship with the static and more tightly grouped composition of the Valero stacks, towers and chimneys. Rather, the development would compound the present level of visual intrusion and spread the influence of development across a significantly greater area, whilst confusing the presently simple contrast between the refinery and its rural setting as seen from the south.

2.4 Para 40. From the B4320 route to and from Angle and Freshwater West through the Park (illustrated by viewpoint near National Trust land at Kilpaison Burrows, 1.4km from the nearest turbine) the turbines would appear as a very prominent array across a substantial part of the field of view. They would form a visually separate and distinct element from the Valero complex, occupying a part of the view, which is essentially pastoral, notwithstanding the more distant minor elements of the power station chimneys, the Wear Point turbines and outlying parts of the refinery site. The presence of the turbines would be accentuated by the rotation of their blades. The development would markedly increase the presence of man-made, industrial-scale elements in the landscape, spreading such visual influences significantly further across the scene and towards the Park.

2.5 Para 41. Further to the south, the turbines would again be prominent in views from the elevated road leading from Castlemartin to Freshwater West, over a distance of almost 2km from West Farm (viewpoint 7, distance to nearest turbine 3.1km) to around Gupton Farm. This stretch of minor road also serves as the Pembrokeshire Coast Path and Wales Coast Path here. The vista of open countryside to the north is essentially unbroken save for the skyline feature of Valero at present. The five turbines would appear linearly spaced across the horizon to the east of Valero, their rotating blades projecting above the intervening ridge of farmland. They would appear as a substantial additional intrusion of very large man-made structures into the pastoral landscape. Depending on the viewer's position they would appear either as a substantial addition to Valero or as a distinct and separate visual element in the landscape. In either case the proposal would significantly increase

and extend the envelope of development away from the Valero complex overlooking the Haven waterway and into the countryside bounding the National Park.

2.6 Para 55. However, I do not regard the refinery's presence as providing a convincing argument for the proposed wind farm. The visual and spatial character of the proposed development is very different to the refinery; I do not consider that the development would be seen as complementary to the refinery, somehow assimilated into the landscape by the refinery's presence or as a consolidation of what is already present. Rather, the number, position and spread of the turbines and the different characteristics of their built form would result in a distinct new development form in this location, which from many directions would appear as a separate and substantial additional development, considerably extending and spreading the built form into and across the adjacent countryside.

2.7 Para 59. However, the proximity of the proposal to the National Park and the effect of the proposal on the Park, including views into and out of the Park, is a key consideration.

2.8 Para 60. In relation to this, and drawing together all of the above, I conclude that the proposed development would have a significant and adverse visual effect on the character and appearance of the landscape of the National Park, particularly as perceived and experienced from substantial areas south and west of the site including the B4320 ridge route to Angle, the B4319 ridge route from Castlemartin to Freshwater West and parts of the Angle Peninsula, Angle Point and Angle Bay together with significant lengths of the Pembrokeshire/Wales Coastal Path. I consider that receptors will have an enhanced level of sensitivity in these locations, given the likelihood of a recreational dimension to the journey (whether by car or on foot, bicycle or horseback) and, whether the purpose of the journey is recreational or not, the probability of a general awareness and appreciation of the landscape qualities of the area.

2.9 Para 109. The broad thrust of concern as to the proposal's adverse visual and landscape effects, expressed by many residents, visitors to the area and local groups and consultees, reinforces my view that the proposal would cause substantial harm to an area highly valued for its qualities of remoteness, tranquillity and open, unencumbered character.

2.10 Para 110. There would be a significant adverse effect on views obtained from substantial lengths of the Pembrokeshire/Wales Coast Path National Trail.

2.11 Para 111. The existence of the Valero oil refinery close to the site does not alleviate this visual harm.

2.12 Para 114. In the light of this duty, I attach particular importance to the objective of protecting landscape character, quality and diversity in relation to the special qualities of the Pembrokeshire Coast National Park, as set out in criterion 3 of LDP policy GN.1. The proposal would not comply with this policy requirement.

### **3. Impacts to National Trust Viewpoints 7, 8 and 11.**

3.1 National Trust wish to emphasise the impacts brought forward on land in its ownership and thus experienced by its visitors to the Pembrokeshire Coast National Park. The submission acknowledges there are large areas brought forward in the National Park where 3 blade tips are visible, including large areas of the Pembrokeshire Coast National Trail and Wales Coastal Path.

3.2 Section 5.201 of the Landscape Seascape Visual Impact Assessment recognises the effects for locations within 1.6km to 2.6km (from Viewpoint 7 and the ZTV in ES Figure 5.17a) as being substantial/moderate magnitude on a landscape of high sensitivity and result in effects on the landscape character of LCA8 that would be major/moderate adverse and significant.

3.3 National Trust emphasise that these significant adverse effects are continuous for the 35 years of development, within the National Park, and for elevated areas within LCA8 only to views with the changed characteristic due to the presence of the three wind turbines. We do not consider the statement within the concluding paragraph of the LVIA (para 5.241) to be correct which gives the incorrect impression that views from this area are already characterised by industrial development. National Trust consider land in its ownership of very high landscape value, much of which is not characterised by industrial development. As such, our conclusion is that the proposed wind turbines would significantly affect the natural beauty of the National Park and so compromise the ability of the National Park to fulfil its purposes.

3.4 We draw attention to Policy 18 in Future Wales which states that “Developments of National Significance will be permitted subject to amongst other matters, there being no unacceptable adverse impacts on the surrounding landscape, particularly on the setting of National Parks”.

### **4. Pembrokeshire and Renewable Energy**

4.1 There have been important developments in wind energy in the past twelve months in Pembrokeshire. The potential offshore wind projects in the Celtic Sea will bring forward large renewable energy generation to Pembrokeshire, through potential cable connections at Pembroke Power Station, and via construction and maintenance benefits to Pembroke Dock. Offshore landscape harm is being thought through, but potentially bringing forward considerably larger generation without undue harm to the National Park.

4.2 At this juncture, it could be considered inappropriate to bring forward three turbines onshore with harm to the National Park, with near equivalent output as that of a single offshore turbine at distance from the Pembrokeshire Coast National Park.

## **5. Concluding comments**

5.1 National Trust do not support the Rhoscrowther Wind Farm. We consider that landscape harm to the National Park should be the key element in the planning balance for the DNS decision. Our representation considers in detail a number of the previous Inspectors conclusions, many remain pertinent for the current DNS.

5.2 We acknowledge that larger scale renewable projects are now required to meet the country's net zero targets, and to reduce carbon emissions to halt climate change. For Pembrokeshire, the larger scale projects can be achieved offshore without compromising the landscape quality that many of our visitors recognise and appreciate in one of the UK's best National Parks.

5.3 The submitted Development of National Significance at Rhoscrowther is the wrong scale of development in the wrong place.

5.4 Thank you for your considerations.

John Pearson, Planning Adviser, National Trust