

Our Ref: NP/21/0754/OBS
7-January-2022

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



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

**Pembrokeshire Coast
National Park
Authority**
Llanion Park, Pembroke Dock
Pembrokeshire SA72 6DY

Dear Sirs,

Town & Country Planning Act 1990 (as amended)
Developments of National Significance (procedure) (Wales) Order
2016 (as amended)
The Developments of National Significance (Wales) Regulations
2016 (as amended)

Proposal: Rhoscrowther Wind Farm - Construction & operation of 3
(No.) wind turbines

Address: Land off Refinery Road, Hundleton, Pembroke,
Pembrokeshire, SA71 5SJ

INTRODUCTION

I write in response to your consultation regarding the above which relates to a Development of National Significance made under the Town and Country Planning Act 1990 for the above development. The application is accompanied by an Environmental Statement as required by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. I trust that the below comments will be taken into consideration when determining the application.

The proposed development comprises three turbines of up to 135m height to tip, together with ancillary development. The application site is located off Refinery Road, near Hundleton in Pembrokeshire. The site borders the National Park to the west and the closest turbine is approximately 0.7km from the boundary of the National Park.

LEGAL AND POLICY CONTEXT

The Environment Act 1995

Section 63 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
- To promote opportunities for the public understanding and enjoyment of



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.

the special qualities of the National Park

In accordance with section 62(2) of the Environment, 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

The Pembrokeshire Coast National Park Authority Local Development Plan 2 (2020) (PCNPA LDP), is the development plan for the National Park. Section 4.6 of the PCNPA 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. 4.6 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

The development plan for the application site is the Pembrokeshire Local Development Plan (2013) (PCC LDP). Particularly relevant to the consideration of impacts on the Pembrokeshire Coast National Park are 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 when determining this planning application.

PLANNING HISTORY

The Applicant submitted a planning application to Pembrokeshire County Council (PCC) in 2014, for five turbines of 100m height to tip (Planning Application Ref



13/0876/PA). The application was refused by PCC and subsequently dismissed at appeal in 2016. Following a challenge to the appeal decision a second Public Inquiry was held in 2017 and the application was again dismissed (Appeal Ref APP/N6845/A/15/3025045). One of the main considerations was the effect of the proposal on the landscape character and visual amenity of the area, with particular reference to the Pembrokeshire Coast National Park.

The proposal was redesigned in 2020 with five turbines at 126.5m height to tip. Following pre-application consultation with statutory consultees between December 2020 and January 2021 the proposal was reduced to three turbines of up to 135m height to tip. The proposal is a Development of National Significance (DNS) and will therefore be considered by the Welsh Government.

CONSIDERATION

The consideration of the National Park Authority has primarily related to the submitted Landscape, Seascape and Visual Impact Assessment (LSVIA) contained in Chapter 5 of the supporting Environmental Statement dated December 2020; which is supplementary to the project Environmental Statement (dated October 2021) and deals with the impact of the proposal. The National Park Authority has commissioned a review of the LSVIA by a specialist consultancy to inform this response to the application.

Scope of assessment and methodology

Scope of assessment - Several different study areas have been considered, extending to 6km (landscape and seascape) and 11km (visual) from the proposed wind turbines, as set out in paragraph 5.15 of the LSVIA. The study areas are shown on the relevant figures, including Figures 5.9 (Landscape and Seascape Character Areas) and 5.20 (Viewpoint Locations). The PCNPA agrees that the study areas include all receptors with the potential to experience significant effects.

The scope of the assessment includes all relevant receptors within the National Park including Landscape Character Areas (LCAs), Seascape Character Areas (SCAs), LANDMAP aspect areas, and visual receptors at settlements, at visitor attractions, on recreational routes and on the local road network. Cumulative effects have been scoped out due to a lack of other proposed wind energy developments in the study area which is considered to be appropriate.

The scope includes effects during the construction, operation and decommissioning phases. As proposed lighting is to be infra-red, no assessment of night-time effects relating to lighting has been undertaken which is acceptable.

LSVIA Methodology - The assessment criteria used in the LSVIA are set out fully in Appendix 5.1. They accord with the Landscape Institute and Institute of Environmental Management & Assessment's 2013 Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3). The LSVIA references LANDMAP Information Guidance Note 3: Using LANDMAP for Landscape and Visual Impact



Assessment for Onshore Wind Turbines (NRW May 2013) although as noted in Natural Resources Wales' consultation response this has been superseded by NRW's Using LANDMAP in Landscape and Visual Impact Assessments GN46.

The LSVIA considers sensitivity and magnitude of change to determine the level of effect and whether it is significant in EIA terms. Sensitivity is judged with regard to susceptibility and value as recommended in GLVIA3. The magnitude of change considers the scale or degree of change and the nature, geographical extent, duration and reversibility of effects as recommended in GLVIA3.

A matrix is used to determine the overall level and significance of effect, as set out in Appendix 5.1, Table A5.1.5 (landscape) and A5.1.10 (visual). Major/moderate or higher effects are considered to be significant. Effects of moderate+ may be considered significant *"if these apply to an extended area or location"* (landscape) or *"if experienced over a sustained length of a route or over most of a zone, area or location"* (visual). Moderate effects *"may contribute to significance if combined with greater changes in the same general location"* (landscape) or *"if combined with greater changes at the same location"* (visual). This reasoning is unclear and it is recommended that the Applicant clarify what is meant by 'greater changes'. Further clarity is required in the visual assessment in Appendix 5.5 to identify which effects are considered to be significant, and for moderate or moderate+ effects further justification is required regarding significance.

The LSVIA considers the potential for adverse and beneficial effects, but states that *"in order to assess the worst case, it is recommended that all predicted significant effects on visual amenity are placed on the negative side of the planning balance, but that the variability in public perception and the likely numbers of receptors who would be affected are taken into account in the planning balance"* (Appendix 5.1, paragraph A5.1.45). This is considered to be appropriate.

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. As set out in Appendix 5.1, the assessment of effects on the National Park considers *"the special characteristics and purposes of these designations plus the predicted residual effects of the development, the theoretical visibility analyses, the viewpoint analysis and other fieldwork observations, and makes a judgement as to whether there are likely to be any significant beneficial or adverse effects on the special characteristics and purposes of the designations"* (paragraph A5.1.21). This is considered to be an appropriate approach.

Baseline information, including sensitivity (value and susceptibility)

A description of landscape, seascape and visual receptors within the National Park is provided in the LSVIA as set out below.

Landscape and seascape receptors - LCAs within the 6km landscape study area are shown on Figure 5.9 and described in paragraphs 5.74 to 5.84. There are four



LCAs within the study area which are within the National Park, three of which are carried forward to detailed assessment:

- LCA 6: Castlemartin/Merrion Ranges;
- LCA 7: Angle Peninsula; and
- LCA 8: Freshwater West/Brownslade Burrows.

The fourth LCA within the National Park (LCA 11: Herbrandston Refinery Fringe on the north-western shores of Milford Haven) has been excluded from the assessment as it is industrial in character and therefore of low sensitivity. This is considered to be appropriate.

An assessment of the character and sensitivity of the LCAs has been undertaken in LSVIA Tables 5.1 – 5.3. This assessment has been carried out in accordance with the assessment criteria in ES Appendix 5.1. LCAs 6, 7 and 8 within the National Park are identified as being of national value which is appropriate. LCA 6 is identified as being of medium sensitivity, and LCAs 7 and 8 of high sensitivity. Justification is provided for these judgements which are considered to be appropriate.

The LANDMAP aspect areas within the 6km landscape study area are shown on Figures 5.3-5.8, and those within the site and study area are discussed in paragraphs 5.62 to 5.73. The assessment focuses on Visual and Sensory Aspect Areas (VSAAs) with theoretical visibility. VSAs with limited theoretical visibility and those which are urban or industrial in nature have been excluded from the assessment. Also excluded are VSAs on the north shore of Milford Haven, where existing wind farms and the Valero Oil Refinery are characteristic of views. The site is within VSA VS061 (Castlemartin) which extends into the National Park and has a moderate overall evaluation. The Applicant considers that the evaluation should be on the “low side of moderate” (paragraph 5.69) due in part to the nearby presence of the Valero Oil Refinery.

Although NRW's Using LANDMAP in Landscape and Visual Impact Assessments GN46 recommends that all LANDMAP aspect areas should be considered in the assessment (not just VSAs), the Applicant's approach is considered acceptable. They have considered effects on the landscape fabric of the site and landscape character using LCAs.

It is considered that the baseline section of the LSVIA describes the full range of potential landscape and seascape receptors within the study area, and that appropriate sources have been referenced. Sources include LANDMAP and the Pembrokeshire Coast National Park Landscape Character Assessment Supplementary Planning Guidance (SPG) for landscape character, and the Pembrokeshire Coast National Park Seascape Character Assessment SPG for seascape character.

Visual receptors - Visual receptors considered in the LSVIA include residents in settlements and individual properties, visitors to beaches and other attractions, walkers on the Pembrokeshire and Wales Coast Path, cyclists on the Sustrans



National Cycle Route (NCR4), users of the local public rights of way and motorists and other road users on the B4320 and local road network.

25 viewpoints are assessed in the LSVIA as shown on Figure 5.20. This includes all viewpoints within the 11km study area that were assessed in the 2014 ES, the 2015 ES Addendum and the LSVIA evidence presented at the 2015 and 2017 Public Inquiries, plus two additional viewpoints (VP 02 and VP 11). 15 of the viewpoints are within or on the edge of the National Park (2, 4, 7, 8, 9, 11, 12, 14, 15, 16, 18, 19, 22, 23, 24, 25). Although no consultation has been undertaken with the Pembrokeshire Coast NPA on the viewpoints for the current application, it is considered that the viewpoints selected are representative of a range of different views, distances and receptor groups, and are appropriately located to properly assess the potential effects of the development.

The Viewpoint Analysis is presented in Appendix 5.5. The type of receptor at each viewpoint and their sensitivity is identified. Although the sensitivity judgements appear to accord with the criteria in Table A5.1.8 of the methodology, the steps to reach the judgement have not been explained. For example, the Applicant does not identify the value of the view or susceptibility of the receptor as set out in the methodology Table A5.1.6 (value) or Table A5.1.7 (susceptibility). For viewpoints within the National Park, the sensitivity of visual receptors varies between High/Medium and High, which is considered to be appropriate. From each viewpoint, the Applicant has provided baseline photography, cumulative wireframe (including the outline of existing vertical elements including the Valero Oil Refinery where visible) and photomontage.

Special qualities - The statutory purposes and special qualities of the National Park are set out at LSVIA paragraphs 5.45 to 5.47. Reference is made to the Landscape Character Assessment SPG for the National Park where the special qualities are set out in detail.

Assessment of effects – construction

Landscape and seascape - Effects on landscape and seascape character within the National Park (LCAs 6, 7 and 8) during the 10-month construction period are set out in paragraphs 5.170 to 5.181 (landscape) and paragraphs 5.213 to 5.220 (seascape). Effects are summarised as follows:

- LCA 6 (Castlemartin/Merrion Ranges) - moderate/minor adverse and not significant effect within 0.7km to 1.9km of the turbines, reducing to minor+ adverse and not significant beyond this distance.
- LCA 7 (Angle Peninsula) - moderate/minor+ adverse and not significant effect within 0.8km to 4km of the turbines, reducing to moderate/minor adverse and not significant between 4km and 6.8km.
- LCA 8 (Freshwater West/Brownslade Burrows) - moderate adverse and not significant effect within 1.6km to 2.6km of the turbines, reducing to moderate/minor adverse and not significant between 2.6km and 4.8km.
- SCA 31 (Outer Milford Haven) – minor adverse and not significant.
- SCA 32 (Inner Milford Haven) - minor+ adverse and not significant within



0.2km to 1.4km of the turbines, reducing to minor/negligible+ adverse and not significant between 1.4km and 7km.

In summary, no significant effects on landscape and seascape character are identified during construction. Given the short-term and temporary nature of construction effects, this conclusion appears reasonable and the justification provided is clear and transparent. It is noted that the Applicant has used the distance of viewpoints as a proxy for the extent of effects on landscape and seascape character, resulting in overly precise statements of geographical extent. It is recommended that the Applicant relate the geographical extent of effects to landscape features as there may be the potential for significant effects beyond locations examined in the visual assessment.

Visual receptors - The assessment of effects on visual receptors during the construction phases (described in paragraphs 5.253 to 5.261) focuses on those in proximity to the site (i.e. Viewpoints 1, 2 and 5, and nearby residential receptors). A slight magnitude of change is identified, resulting in effects ranging from moderate/minor to moderate and not significant, depending on the receptor. Beyond these close views no significant adverse effects on the visual amenity of receptors are identified. These conclusions appear reasonable and justification is provided.

Special qualities - The LSVIA concludes that “the construction phase would not significantly affect the character of the landscapes or seascapes within these LCAs and SCAs within the PCNP. It would also not significantly affect any of the special qualities of the PCNP...” (paragraph 5.230). The Applicant concludes that the construction works would therefore not significantly affect the purposes of the National Park (paragraphs 5.231-232). These conclusions appear reasonable and justification is provided.

Assessment of effects – operation

Landscape and seascape - Operational effects on landscape and seascape character within the National Park (LCAs 6, 7 and 8) are described in paragraphs 5.193 to 5.201 (landscape) and 5.222 to 5.225 (seascape). Effects are summarised as follows (with significant effects in bold):

- LCA 6 (Castlemartin/Merrion Ranges) - **major/moderate to moderate+ adverse and significant** within 0.7km – 1.9km, reducing to moderate to minor adverse and not significant beyond this distance.
- LCA 7 (Angle Peninsula) – **major/moderate to moderate+ adverse and significant** within 0.8km – 4km, reducing to moderate to minor+ adverse and not significant between 4km and 6.8km.
- LCA 8 (Freshwater West/Brownslade Burrows) - **major/moderate adverse and significant** within 1.6km – 2.6km of the turbines, reducing to moderate adverse and not significant between 2.6km and 4.8km.
- SCA 31 (Outer Milford Haven) - moderate/minor adverse and not significant.
- SCA 32 (Inner Milford Haven) - moderate adverse and not significant within 0.2km – 1.4km, reducing to moderate/minor+ to minor+ adverse and not significant between 1.4km and 7km.

In summary, significant effects on landscape character will extend into the National



Park, up to 4km from the nearest turbine in some places. Given the relatively small scale of the development, this conclusion appears reasonable, notwithstanding earlier comments regarding the relation of the geographical extent of effects to landscape features. Effects on special qualities are summarised below.

Visual receptors - The assessment of effects on visual receptors during operation is set out in Appendix 5.5 and summarised in paragraphs 5.145 -5.150. Effects of moderate+ or above have been shaded in the table although it is unclear if the Applicant considers these effects to be significant. For the 15 viewpoints in or on the edge of the National Park, effects of moderate+ and above are identified at the following locations:

- A **major/ moderate+ and significant** effect on Horse riders / Walkers / Cyclists / Motorists at Viewpoint 2 (Lane to Rhoscrowther);
- A **major/ moderate+ and significant** effect on walkers on the Wales Coast Path at Viewpoint 4 (Pembrokeshire and Wales Coast Path, west of Rhoscrowther);
- A **moderate/ major and significant** effect on Horse riders / Walkers / Cyclists / Motorists at Viewpoint 7 (B4320, south of Neath);
- A **moderate+ and significant** effect on residents at Viewpoint 8 (Castlemartin) – significant effect on residents in Castlemartin confirmed in LSVIA paragraph 5.310(i);
- A **major/ moderate and significant** effect on walkers on the foreshore, and a **moderate+ and significant** effect on walkers on the Wales Coast Path at Viewpoint 9 (Pembrokeshire and Wales Coast Path, Angle Bay);
- A **moderate+** effect on walkers on the Wales Coast Path at Viewpoint 11 (Pembrokeshire and Wales Coast Path near Gupton Farm) – the text in LSVIA paragraphs 5.310 and 5.311 indicates that this is not considered to be significant;
- A **moderate+** effect on Walkers / Visitors to Pub and beach at Viewpoint 12 (The Old Point House, Angle on the Pembrokeshire and Wales Coast Path) - the text in LSVIA paragraphs 5.310 and 5.311 indicates that this is considered to be **significant**;
- A **moderate+** effect on Walkers / Visitors to beach at Viewpoint 14 (East of St Mary's Church, Angle Bay) - the text in LSVIA paragraphs 5.310 and 5.311 indicates that this is considered to be **significant**;
- A **moderate+** effect on walkers at Viewpoint 15 (Pembrokeshire and Wales Coast Path, North Hill) - the text in LSVIA paragraphs 5.310 and 5.311 indicates that this is considered to be **significant**.

In summary, significant visual effects on receptors within the National Park will extend up to a distance of approximately 4.5km (Viewpoint 15). PCNPA is broadly in agreement with the overall conclusions of significance at each of the receptors assessed, although finds the assessment set out in Appendix 5.1 to be brief and lacking clarity in which effects are considered to be significant (in particular for moderate+ effects). The PCNPA considers the effect at Viewpoint 11 to be significant and the effect at Viewpoint 24 to be on the borderline of significance.

Special qualities - Effects on the special qualities and purposes of the National Park



are described in paragraphs 5.235 to 5.247. The Applicant concludes that there would be no effects on the following special qualities: diverse geology, diversity of landscape, distinctive settlement character, rich archaeology, cultural heritage, richness of habitats and biodiversity, islands, accessing the park or space to breathe.

It is concluded that the proposal would not affect the ‘remoteness, tranquillity and wilderness’ special quality as these qualities “are more evident in the landscapes further west and south within the National Park and not in those areas closest to the site” (paragraph 5.237). The Applicant also concludes that there would be no effect on the ‘coastal splendour’ special quality due to limited visibility from coastal areas (paragraph 5.238), as the turbines will be seen in distant views (paragraph 5.239), or as the turbines will be seen in the context of existing industrial development (paragraph 5.240).

The Applicant concludes that “the proposed wind turbines would not significantly affect the natural beauty of the National Park overall or the ability of the public to enjoy and understand the special qualities of the National Park and so would not compromise the ability of the National Park to fulfil its purposes” (paragraph 5.243).

In terms of the setting to the National Park, the Applicant concludes that “the Pembrokeshire Coast National Park does not have a landward component to its setting and there would not be any significant effects on the seascape character of the seaward component of the setting of the National Park” (paragraph 5.247).

Mitigation and Design

The Design and Access Statement (October 2021) states that different layouts were considered, and that “a layout with the turbines close to Valero Oil Refinery would reduce any impact on the National Park and the Church of St Decumanus, Rhoscrowther (Listed Building Grade I)” (paragraph 5.4).

Mitigation measures of relevance to the landscape, seascape and visual assessment are described in LSVIA paragraphs 5.119 – 5.123. Embedded mitigation measures relating to the site location state that it is:

1. “Not within any national or local landscape designations.
2. Close to an existing grid connection (so the grid connection will be very short and underground).
3. Located adjacent to the existing Valero Oil Refinery, so the site and surrounding landscape and views from the surrounding area are already characterised to varying degrees by the oil refinery complex.
4. Located within the HWEZ, which has a focus on the energy and environmental sectors, and in an area that already includes other industrial installations, including the Pembroke Power Station and two solar farms, plus the abandoned BP Oil Storage site.
5. In a landscape that has been used as a landfill site in the past, although now restored to farmland” (paragraph 5.120).



In terms of the wind farm design it is noted that the proposed development has been reduced from five to three turbines and that “these would be up to 135m in height, adjacent to and well below the height of the nearby Valero Oil Refinery chimneys (up to 169m) and so would appear close to and smaller than the chimneys in views from most locations”. Although this is true of more distant viewpoints, the turbines would be closer to the viewer and therefore appear larger than the Valero chimneys from LSVIA viewpoints 1, 2, 3, 5 and 6. Of these only Viewpoint 2 (Lane to Rhoscrowther) is within the National Park, and represents views from a short section of the minor road which runs along the boundary of the National Park.

In terms of the design of the wind farm the Applicant states that turbines would be located “at similar ground elevations (45 – 56m AOD) and at regular distances apart so that the three turbines appear in an evenly spaced line and at a consistent height from most locations”. It is agreed that the turbines would appear evenly spaced and at a consistent height from most of the LSVIA viewpoints.

In terms of tip height, in the Design and Access Statement (October 2021) the Applicant states that a 135m turbine “would be the most suitable for the Development given the size of the nearby Valero chimneys”. It is noted that operational wind farms within the LSVIA study area are lower in height than the proposed turbines, with the largest being Wear Point Wind Farm with four turbines at 100m height to tip.

The Pembrokeshire Coast National Park Renewable Energy SPG (2021) identifies High sensitivity to large scale wind turbines in LCAs 6, 7 and 8. In LCAs 6 and 7 the SPG identifies limited opportunities for a single or a small cluster (2-3) of medium or large turbines (under 100m to blade tip) on land close to the oil refinery chimneys. It is noted that the SPG only has formal status within the National Park, but can also be of value in assessing the impact of schemes outside of the National Park. The SPG goes on to state that the PCNPA “should ensure that any wind turbine development located within this LCA does not sacrifice the essential integrity, coherence and character of the landscape or the special qualities of the National Park”.

Photography and visualisations

The Methodology for Production of ZTVs and Visualisations is provided in Appendix 5.7.

It is stated that the ZTVs and visualisations have been produced in accordance with current guidance including Scottish Natural Heritage (SNH)’s Visual Representation of Wind Farms guidance and the Landscape Institute’s Technical Guidance Note 06/195.

The baseline photography is generally clear although photography has been taken throughout the year and does not always represent the ‘worst case’ visibility when deciduous vegetation is not in leaf.

The wireframes and photomontages in Figures 5.21 to 5.45 are considered sufficient to understand the visual effects of the proposal. However, all of the visualisations



illustrate a 120 degree horizontal field of view (HFoV) which is not in line with current good practice guidance. SNH's Visual Representation of Wind Farms guidance recommends a 53.5 degree HFoV for A1 width paper sizes, with a wider HFoV considered appropriate for very close viewpoints (para 113).

The photomontages do not illustrate ancillary infrastructure (e.g. substation, tracks) and so the appearance of these components is difficult to assess.

CONCLUSION

In conclusion, the PCNPA has concerns regarding the information that is before the decision maker in the LSVIA, including the following:

- In the visual assessment in Appendix 5.5, it is recommended that the Applicant identify the value of views and susceptibility of the receptor as set out in their methodology in Appendix 5.1, Table A5.1.6 (value) and Table A5.1.7 (susceptibility).
- In the landscape and seascape character assessment it is recommended that the Applicant relate the geographical extent of effects to landscape features rather than viewpoint locations, as there is the potential for significant effects from locations which have not been examined in the visual assessment.
- In the visual assessment in Appendix 5.5 it is recommended that the Applicant clarifies which effects are considered to be significant, and provides further justification for borderline effects of moderate or moderate+. Further explanation is required in the methodology in Appendix 5.1 to understand the 'greater changes' relating to moderate or moderate+ effects.
- The wireframes and photomontages illustrate a 120 degree horizontal field of view (HFoV). This is not in line with current good practice wind farm visualisation guidance which recommends a 53.5 degree HFoV presented on an A1 width sheet. The Applicant should provide justification for this approach.

While opportunities for mitigation are limited, the Applicant should also consider further landscape enhancement proposals to secure long-term environmental net gain, noting that they have committed to in-fill existing "gappy" hedgerows within the site to compensate for the loss of hedgerows at the site entrance and along the access track.

The impact of the proposal on heritage assets in the National Park Authority are addressed in the Pembrokeshire County Council Local Impact Report and are not repeated in this representation.

The PCNPA has reservations whether the landscape and visual impact of development has been adequately assessed, as detailed above.

It is also our view that significant adverse landscape and visual impacts as detailed above are likely to extend into the National Park during the operation of the windfarm.

We therefore **object** to the proposal.



Yours faithfully,



Matthew Griffiths MRTPI
Team Leader – Development Management

