NP/26/0324/OBS

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Dear Mr. Brumwell,

Gwynt Glas Offshore Wind Farm Environmental Impact Assessment Scoping Report Ref EN0110036
Pursuant to Regulation 10 of the Infrastructure Planning (Environmetnal Impact Assessment) Regulations 2017 and Regulation 13 of the Marine Works (Environmental Impact Assessment) Regualtions 2007 (as amended)

INTRODUCTION

The following comments are provided in relation to the Seascape and Landscape Visual Impact Assessment methodology and proposed viewpoints.

DEVELOPMENT DESCRIPTION

The Project Design Envelope is stated as being 42km off the Pembrokeshire Coast, having a 369 km2 array area with a proposed operational lifespan of 40 years. The minimum number of turbines is 66, with a maximum of 118 and with maximum blade tip heights of 220m minimum and 310m maximum. Onshore grid connection is stated at Llandyfaelog substation with landfall options for offshore and onshore export cables as yet unidentified but included within a scoping boundary.

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
- 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.

Cymraeg

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.

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.

The Pembrokeshire Coast National Park Partnership Plan (2025-2029) defines the special qualities of the National Park as:

- Landscapes and seascapes of exceptional diversity and quality
- Outstanding coastal scenery
- Distant, uninterrupted views and open horizons
- Beaches
- Spectacular geology and geomorphology
- Rich and varied wildlife
- Tranquillity, soundscapes and wildness
- Dark Skies
- Rich heritage and culture
- Welsh language and Pembrokeshire dialects
- Historic patterns of land and traditional boundaries
- Excellent opportunities to enjoy and experience the National Park
- A comprehensive network of Rights of Way
- The combination of special qualities
- A sense of community and stewardship

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. **The scoping report refers to the special qualities as defined in the PCNP Management Plan 2019 which has now been superseded by the PCNP Partnership Plan (2015 – 2029) as listed above. These should be updated by Gwynt Glas. 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 Assessment.**

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.

Seascape, Landscape and Visual Impact Assessment

Scope of Assessment and Methodology

Section 2.11 states that the array scoping boundary is approximately 36km from the closest point of the Pembrokeshire Coast National Park at Skokholm Island and 39km from the closest mainland point at St. Anns Head. This is slightly different from the stated 42km from the Pembrokeshire Coast. Distances should therefore be clarified.

A 60km radius has been identified as the study area for the SLVIA. The accompanying ZTV states a worst case scenario of 66 turbines of 310m blade tip height. It is unclear as to why this scenario has been identified as the worst case as the maximum number of turbines is identified in the scoping report as 118 turbines. Clarification should be provided on this point. PCNPA agree that the study area of 60km radius included all receptors with the potential to experience significant effects. Whilst there is no specific mention of the offshore transmission substations, it is assumed that these would be located within the Project Design Envelope, but at a closer proximity to the shore then the turbines. It is unclear if these will be subject to assessment.

15 Viewpoints have been identified on the ZTV, all within the higher theoretical visibility. Whilst a list has also been provided, the scale and clarity of the map makes it difficult to clearly identify the viewpoints, and this should be addressed in the EIA.

The viewpoints are considered by the Pembrokeshire Coast National Park Authority, to be largely appropriate and proportionate for assessing areas where seascape, landscape and visual impacts may result in significant effects on the National Park for the proposed development and in addition to and in combination with other developments. It is noted that the potential for cumulative effects has been scoped in which PCNPA agree with, although a ZTV for the cumulative assessment has not been provided at this stage.

The Seascape Character Areas as identified and assessed in the Pembrokeshire Coast National Park Authority's Supplementary Planning Guidance on Seascape Character have not been identified in the scoping report which is considered to be an omission.

The SLVIA methodology is described in section 2.11.4.2 of the report and PCNPA agrees that this will be in accordance with the Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3). PCNPA also agree with the precautionary approach which assumes that significant landscape and visual effects would be weighted on the negative side of the planning balance, although positive or neutral effects may arise in certain situations.

PCNPA also agree with the identification of the principal visual receptors.

Whilst reference has been made to both daytime and nighttime assessments, no specific mention of a dark skies assessment has been made. There are a

number of Dark Sky Discovery Sites within the identified ZTV and special consideration should be given to a nighttime assessment from these sites, as dark skies have been identified as one of the special qualities of the Pembrokeshire Coast National Park. Guidance on lighting assessments can be found in the Welsh Government Good Practice Guidance on Planning for the Conservation and Enhancement of Dark Skies in Wales.

Onshore LVIA

The scoping report states that as there are uncertainties regarding the location of the onshore transmission infrastructure, potential viewpoints have not been identified in the scoping report. An onshore scoping boundary plus a 5km buffer for the assessment of onshore transmission substations and a 3km buffer for the assessment of all potential landfall sites. Whilst PCNPA is broadly in agreement with this approach, the scoping boundary study area has not been identified.

PCNPA request that onshore viewpoints are agreed with PCNPA once landfall locations have been identified.

CONCLUSION

The Pembrokeshire Coast National Park Authority considers that the intended scope and methodology for the Seascape, Landscape and Visual Impact Assessment will consider all likely effects on the National Park seascape, landscape , special qualities and visual amenity, subject to full assessment of the matters raised above.

Yours sincerely,



Principal Planning Officer, Strategic Policy