

## Report of the Director of Planning and Park Direction

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### **Subject: National Park Authority response to consultations on the Erebus Floating Wind Farm project in the Celtic Sea.**

#### **Purpose of this report**

1. The purpose of this report is to agree the principles of the National Park Authority response to consultation on the consents required for the Erebus Floating Wind Farm Project. The Authority is being consulted under the Marine and Coastal Access Act 2009: Part 4 Marine Licensing and the Marine Works (Environmental Impact Assessment) Regulations 2017. In a separate consultation under Section 36 of the Electricity Act 1989 and The Electricity (Offshore Generating Stations) (Applications for Consent) (Wales) Regulations 2019. An Environmental Statement for the project has been prepared under The Electricity Works (Environmental Impact Assessment) (England and Wales) Regulations 2017.
2. The response deadlines outlined below cannot be extended and officers have reported this matter to the National Park Authority to allow Members of the Authority to consider the nature of the response to this project at the only available meeting prior to the deadlines. As Members will note the response is awaiting advice in certain areas from specialist officers within the Authority and these will be included in the finalised response. The intention of this report is to give an opportunity for Members to feed into the response and to agree the general principles of the Authority's response.

#### **Background**

3. This report relates to the "Project Erebus" which is an offshore floating wind farm to the south west of the National Park in the Celtic Sea.
4. Blue Gem 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 and a deemed planning permission for the associated onshore transmission infrastructure.
5. As a separate statutory process, the Applicant has also applied to Natural Resources Wales (NRW) for a Marine Licence for this project. The Marine Licence application is made under the Marine and Coastal Access Act 2009 to carry out certain activities in the marine environment, including construction works, depositing substances or articles and dredging. The Section 36 process and the Marine Licence process have different statutory steps and requirements, and are being carried out by different organisations.

6. The array area is located approximately 35 km southwest of the Pembrokeshire coastline, covering an area of 43.5 km<sup>2</sup> in water depths of between 65-85 m. The array area is located outside of the 12 nm limit, but all elements of the Project, array area, offshore export cable corridor and landfall, fall within Welsh territorial waters or the Welsh Zone. The wind farm will have installed generating capacity sufficient to power 90,000 homes.
7. The Project comprises up to ten Wind Turbine Generators (WTG) with a total generating capacity up to 100 MW. Each WTG is housed on a semi-submersible floating platform with a mooring system comprising a maximum of five catenary mooring lines, up to 870 m in length, and a range of foundation options including drag embedment anchors, driven piles, drilled piles and/or suction piles. Up to 10 dynamic array cables are proposed, with a lazy wave configuration from the semi-submersible floating platform to the seabed. The offshore export cable, up to 49 km in length, links the array area to landfall at West Angle Bay, Pembrokeshire. The Project also comprises an onshore export cable and an onshore substation, located close to the existing Pembroke Power Station.
8. These are significant developments for which the Pembrokeshire Coast National Park Authority is a Consultee. At officer level a response has been prepared to the Marine Licence application and to the Section 36 consent application which are at Annex 1 and 2 and are in draft form.

### **The consultation process**

9. A recent letter from Planning and Environment Decisions Wales (PEDW), provided additional information on the consultation process and set out:
  1. The Approach to Environmental Impact Assessment.
  2. The procedure and period for making objections to the application for consent under Section 36 of the Electricity Act 1989, and the deemed planning application that companies it.
  3. The next steps for the Section 36 application process once the objection period closes, and
  4. How to contact NRW to make representations relating to the Marine Licence application.
10. Approach to Environmental Impact Assessment -In a notice dated 12 September 2019, in accordance with Regulation 39 of the Electricity Works (Environmental Impact Assessment) (England and Wales) Regulations 2017 (the 2017 Regulations), the Welsh Ministers confirmed that they are satisfied that:
  - a) NRW will undertake an assessment of any significant effect on the environment under the Marine Works (Environmental Impact Assessment) Regulations 2007.
  - b) The marine works assessment will be sufficient to meet the requirements of the EIA Directive.

- c) NRW will make the results of the marine works assessment (and any information relating to that assessment that the Welsh Ministers may reasonably require) available to the Welsh Ministers for the purposes of determining the application under section 36 of the Electricity Act 1989.
11. Therefore, under powers provided by Regulation 39 (2) of the 2017 Regulations, the Welsh Ministers have decided there is no need to assess the environmental effects of this proposed development under the 2017 Regulations in relation to the section 36 application.
  12. PEDW, acting for the Welsh Ministers, is still satisfied that this is appropriate, and that the environmental effects of the proposal will not be assessed as part of the Section 36 application process. Therefore clear guidance has been provided to the Authority that representations on the environmental impacts of the project must be submitted to NRW as part of the marine licence application.
  13. Objections to the application for consent under Section 36, including the deemed planning application for onshore elements
  14. The application was submitted to PEDW on 22 December 2021. The Electricity (Offshore Generating Stations) (Applications for Consent) (Wales) Regulations 2019 (the 2019 Regulations) provide that at least 28 days must be allowed for people to make their objections. The Applicant published notice of the application in local and national newspapers on several dates from 22 December to 31 December 2021. The 2019 Regulations provide that Local Planning Authorities (LPA) have a longer period to submit an objection to a Section 36 application, Pembrokeshire County Council and Pembrokeshire Coast National Park Authority, were given notice of the application on 22 December 2021 in accordance with Regulation 4 of the 2019 Regulations. Under Regulation 8(2) of the 2019 Regulations the LPAs have four months, to lodge an objection to the application (i.e. no later than Friday 22 April 2022). This deadline which applies only to these two LPAs remains unchanged.
  15. Copies of the Section 36 application documents are available on the Applicant's website: [www.bluegemwind.com/planning/documents/](http://www.bluegemwind.com/planning/documents/)
  16. The documents can also be viewed on PEDW's casework portal: <https://planningcasework.service.gov.wales/> - Search Reference 3251528
  17. After the Objection Period - Where required by 2019 Regulations, or where the Welsh Ministers otherwise decide to exercise their discretion to do so, the Welsh Ministers may cause a Public Local Inquiry (PLI) to be held to consider the application. After the close of the period for the Local Planning Authorities to make any objection, PEDW will determine the procedure and confirm this to all recipients of this letter and by publishing it on our casework portal.
  18. If no inquiry is necessary, an appointed Inspector will consider all of the written evidence and objections before submitting their recommendation in the form of a report to the Welsh Ministers, who will make the formal decision.

19. The Marine Licence application - The consultation period for the marine licence has commenced so any representations in respect of the Marine Licence, this should include any representations relating to the environmental effects of the proposal. The case details are:

Case name: Project Erebus Floating Offshore Wind Farm.

Case reference number: ORML2160

Link to public notice:

<https://ymgynggori.cyfoethnaturiol.cymru/english/>

Link to document search on the Public Register (using case number ORML2106):

<https://publicregister.naturalresources.wales/>

### **Summary of Proposed Response**

20. The officer-level responses which it is proposed to be submitted on behalf of the National Park Authority are provided in draft at Appendix 1 and 2 to this report. There are two responses to the project, to reflect the advice we have received from PEDW; the Marine Licence response contains comments on all aspects of the Environmental Statement.
21. The National Park Authority is supportive of the Government's renewable energy targets and reflected in the Local Development Plan, including Policy 33. It is noted that the project would make a substantial contribution to renewable energy targets and potentially provide power to 90,000 homes. The proposed development is aimed to be a technological demonstration of the floating wind farm approach in this location and would also make a contribution to attaining both regional and national renewable energy targets.
22. The project is accompanied by a lengthy and detailed Environmental Impact Assessment, which has 31 chapters:
- Chapter 1 – Introduction
  - Chapter 2 – Overview of EIA Methodology
  - Chapter 3 – Site Selection and Alternatives
  - Chapter 4 – Proposed Development Description
  - Chapter 5 – Policy and Legislation
  - Chapter 6 – Marine and Coastal Processes
  - Chapter 7 – Marine Seabed and Water Quality
  - Chapter 8 – Offshore Designated Sites
  - Chapter 9 – Marine and Coastal Ecology
  - Chapter 10 – Fish and Shellfish Ecology
  - Chapter 11 – Offshore Ornithology
  - Chapter 12 – Marine Mammals
  - Chapter 13 – SLVIA
  - Chapter 14 – Offshore Archaeology and Cultural Heritage
  - Chapter 15 – Commercial Fisheries
  - Chapter 16 – Shipping and Navigation
  - Chapter 17 – Aviation and Radar

Chapter 18 – Coastal and Marine Infra and Other Users  
Chapter 19 – Onshore Geology Hydrology Hydrogeology  
Chapter 20 – Terrestrial and Coastal Ecology and Onshore Ornithology  
Chapter 21 – LVIA  
Chapter 22 – Noise  
Chapter 23 – Onshore Archaeology and Cultural Heritage  
Chapter 24 – Land Use  
Chapter 25 – Traffic and Transportation  
Chapter 26 – Air Quality  
Chapter 27 – Socio Economic Tourism and Recreation  
Chapter 28 – Climate Change Major Accidents and Disasters  
Chapter 29 – Inter-related Effects  
Chapter 30 – Cumulative Effects  
Chapter 31 – Residual Effects

23. Officers consider the EIA to be comprehensive and sufficient to identify the environmental effects of the proposal and it appears to have responded to and addressed the scoping opinion provided by Natural Resources Wales. The windfarm is located offshore, around 35km south west of the Pembrokeshire coastline. It is therefore located in Welsh territorial waters a considerable distance outside of the National Park. Given this position many of the technical considerations and impacts of the development would fall outside the jurisdiction of the National Park Authority and unlikely to have direct impacts. These will be matters for the determining Authorities: PEDW and NRW to consider in light of the advice of a range of other specialist consultees.
24. Visual and seascape impact of the offshore works – The developer has outlined how their siting of the scheme, 35km offshore, has been the main mitigation for seascape and visual impact. Potential impacts on the special qualities for which the PCNP has been designated have been taken into consideration and adverse impacts on the designated landscape of the National Park have, it is considered been minimised, although they cannot be wholly avoided. Officers largely accept the view that the sense of remoteness and tranquillity will not be lost, the pattern and diversity of the landscape will remain, and significant effects on undeveloped coastline are avoided due to the distance of the Project outside the National Park boundary. Officers also largely accept that the project will not significantly adversely affect seascape character, landscape character, quality or diversity, including the special qualities of the National Park.
25. While many of the impacts do not represent significant environmental effects, there remain numerous moderate / minor adverse effects. These impacts are widespread and seen across an extensive stretch of the National Park's coastline. The assessment considers that no additional mitigation is required as the Project will result in no significant seascape, landscape or visual effects. Clearly it is not appropriate to screen views. Further mitigation would likely require a re-design of the project potentially setting it further offshore or reducing the scale of the development. It is also not possible to enhance the

seascape setting of the National Park. In light of the extensive adverse impacts in the National Park the developer has been approached regarding the potential for landscape enhancement. This would likely help to support the local delivery of projects that would benefit landscape character, natural environment, built environment, access and enjoyment of interests within the National Park.

26. Offshore impacts assessed in Chapters 7-18 –include many significant impacts such as potential detriment to offshore ornithology from interruption of migration routes and flight lines or impact on shipping. Many of these issues are for other to comment on in detail, noting that the site is close to the major shipping lanes that access Milford Haven and other ports. This includes numerous vessels carrying petrochemicals to both liquid natural gas terminals and refineries. Detailed consideration of these and a wide range of other issues has been given in the Environmental Statement supporting the application. These are matters that are outside the scope of the National Park Authority role and are properly a matter for Natural Resources Wales to consider.
27. The onshore works include the construction of a landfall and cable route through the National Park and onwards into the planning area of Pembrokeshire County Council. The Landscape and Visual Impact Assessment for the onshore works has been reviewed and it is noted that construction works are likely to have significant impacts, but would be of relatively short duration. The identified adverse impacts of the substation are noted, but this element would only have a limited and mitigated impact within the National Park.
28. The terrestrial and coastal ecology and onshore ornithology impacts would be mitigated and the EIA indicates a beneficial residual effect is anticipated through appropriate restoration and enhancement. The Authority is awaiting comments on this element of the project and the final response will reflect advice received.
29. The onshore archaeology and cultural heritage assessment has identified some moderate adverse effects which would be considered significant for EIA. The mitigation includes further archaeological evaluation and recording of sites and also appropriate design of the substation, including size, materials, lighting and landscaping. The Authority is awaiting comments on this element of the project and will reflect advice received in the final response and we will in the response provide a view on whether we consider mitigation to be effective.

## **Conclusion**

30. 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 tackling climate change and increasing energy security.

31. Balanced against this there will remain some adverse residual impacts from the project, some of these are significant such as the short duration impacts during construction. The Authority notes that there are some moderate impacts identified where consultants have assessed that this does not represent a significant environmental effect. The Authority has drawn attention in its representation to the need for the decision maker to fully consider if this judgement is 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 Character.
32. Officers have approached the applicant to consider providing landscape enhancement, this is considered to be justified in light of the adverse impacts identified. This will need to be secured by the decision maker, the normal mechanism to do this would be through an agreement under Section 106 of the Town and Country Planning Act 1990, however it is not clear if this will be possible in this case. Officers will continue to work with the developer and relevant parties to secure landscape enhancement.
33. Overall, on balance, it is recommended that the Pembrokeshire Coast National Park Authority does NOT OBJECT to the project. This lack of objection will be reflected in the consultee response to Natural Resources Wales and Planning and Environmental Decisions Wales, which will be based on the draft responses provided in Annex 1 and Annex 2.

### **Risk considerations**

34. The Authority responds to numerous consultations on development projects with implications for the National Park, where we are not the direct decision maker. We seek to inform the decision maker on the likely impact of a development and from this to mitigate the potential for there to be harm to the National Park and its Special Qualities. By choosing not to respond to the consultation we risk the decision maker not being fully informed of the Authority's views in making a decision and ensuring that our views on the harm and mitigation are not known.
35. Due to the requirements for the Section 36 application, it is advised that the Authority must give a clear view whether it is objecting or not objecting to the proposal. As noted below there are likely to be more financial implications by objecting to the proposal, but this is considered to be significantly out balanced by the need to ensure that the decision maker is properly informed of the Authority's view if we do object.

## **Financial considerations**

36. 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 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.

## **Welsh Language considerations**

37. 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 11, February 2021) 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.

## **Human Rights considerations**

38. 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 representation on the project.

## **Recommendation: Members are asked to:**

39. Delegate to the Director of Planning and Park Direction to finalise a response to Natural Resources Wales and Planning and Environment Decisions Wales, with the Pembrokeshire Coast National Park Authority NOT OBJECTING to the project.

Annex 1 – Draft letter to Natural Resources Wales in respect to Marine Licence  
Annex 2 – Draft letter to Planning and Environment Decisions Wales in respect to Section 36 of the Electricity Act consultation.



Natural Resources Wales

**Date:** [draft] March 2022

**Contact:** Mr Matthew Griffiths

**Our Ref:** NP/22/0138/OBS

**Your Ref:** ORML2160

Dear Sirs,

**Marine and Coastal Access Act 2009: Part 4 Marine Licensing  
Marine Works (Environmental Impact Assessment) Regulations 2017**

**Proposal:** Project Erebus Floating Offshore Wind Farm (Case reference number: ORML2160)

**Location:** Celtic Sea and Angle Peninsula

**INTRODUCTION**

I write in response to your consultation regarding the above Marine Licence application. Notice was given to our Authority in writing by Natural Resources Wales (NRW) that an application had been made in a letter of the 10 February 2022.

An additional letter of the 25 February 2022 from Planning and Environment Decisions Wales clarified the consultation process in relation to the Marine Licence and the concurrent application made under Section 36 of the Electricity Act 1989. This advised us to make any representations that we have on the environmental impacts of the project as part of our representation in relation to the Marine Licence application. As a separate representation we will write to PEDW in relation to the application for consent under Section 36 of the Electricity Act 1989. Our representation therefore comments on the project as a whole as described in the applicant's Environmental Statement and includes our views on the environmental effects of the onshore elements of the proposal.

**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 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 (LDP), is the development plan for the National Park. Section 4.13 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. 4.13 identifies that in commenting on proposals outside the National Park it will use Policy 1 National Park Purposes and Duty (Strategy Policy). Policy 1 sets out the National Park's purpose and duties.

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 artificial 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 the visibility of the night sky. Wherever possible opportunities to mitigate potential cumulative impacts on the night sky should be explored.

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.

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 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 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 reaching a decision.

## **CONSIDERATION**

Our comments have focussed on the environmental effects of the proposal as a whole that are likely to impact on the Pembrokeshire Coast National Park Authority, as described in the projects supporting Environmental Statement.

The comments have been restricted to the main areas where it is considered that there is likely significant environmental impact on the National Park, these relate to the landscape and visual impact of development, both for this individual project and due to potential cumulative impacts. 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. We have provided wider comments on the onshore development within the National Park boundary where these are considered in the Environmental Statement. We agree with the structure of the Environmental Statement. There is a clear need to consider the effects as a whole and the inter-relationship between Seascape, Landscape and Visual Impact (offshore); Landscape and Visual Impact (onshore); and Onshore Archaeology and Cultural Heritage.

### Seascape, Landscape and Visual Impact Offshore

The Environmental Statement contains in Chapter 13 a “Seascape, Landscape and Visual Impact Assessment” (SLVIA). The Authority comments as follows on the assessment of impacts contained within this chapter:

*SLVIA Study area* -The study area has been defined based on professional judgement, guidance, consultations with relevant stakeholders and a Zone of Theoretical Visibility (ZTV). The ZTV shows that the site will be extensively visible along the coast and also elevated areas inland. Visibility beyond the study area within the National Park is also identified. While noting this, this would be at a long distance from the site and the extent of the study area appears to be justified based on the ZTV submitted for the project.

*View point selection* – Viewpoints have been identified for both day and night. Viewpoints are reasonable in number, extend along the coast and reflect discussions with stakeholders. The viewpoints are spread over the National Park and include fifteen day time viewpoints and four night time viewpoints. These are spread through

the study area and representative of various receptors. Overall it is considered that the viewpoint number and selection is largely appropriate and proportionate for assessing areas where landscape and visual impact might be significantly impacting on the National Park for this project and in combination with other developments.

*SLVIA Potential Visual Effects* – The assessment of visual effects is accompanied by a thorough narrative explanation of how the conclusions were reached which is detailed and welcomed. Effects on viewpoints are all adverse and primarily of Low magnitude, not significant (moderate/minor). It is noted that the effect on Viewpoint 4 at Skomer Island is identified as being of low magnitude, not significant (moderate) and represents the location in the National Park closest to the development.

The Authority accepts that the distance from viewpoints along the coast reduces the impact of the development significantly. There remain adverse impacts, but the Authority accepts the evidence within the Environmental Statement that these impacts are of low magnitude and do not represent significant environmental effects.

While accepting this on an individual basis, the widespread extent of the effects over an extensive stretch of the National Park coastline it is our view that this should be considered as increasing the significance of impacts.

*Assessment of impact on the special qualities of the Pembrokeshire Coast National Park* - The SLVIA identifies the presence of the National Park and identifies its special qualities and those relevant to the development. The assessment considered impacts on “Coastal Splendour”; “Diversity of Landscape”; “Islands”; “Space to Breathe”; and “Remoteness, Tranquillity and Wildness” and “Diversity and Combination of Special Qualities”. In relation to Remoteness, Tranquillity and Wildness the assessment provides comments on the impact of aviation lighting of the turbines.

Overall, the impact of the development on the special qualities of the National Park are extensively and appropriately discussed with justified conclusions reached. The Authority accepts the conclusion in the SLVIA that the significance of the residual effects on the special qualities are adverse, but of low magnitude and not significant. We do not agree that the SLVIA supports the following conclusion: “13.8.7.44 The potential impacts on the special qualities for which the PCNP has been designated have been taken into consideration and adverse impacts on the designated landscape of the PCNP have been avoided.” Impacts have not been avoided as stated there are clear adverse impacts on the National Park.

*SLVIA Potential Seascape Effects* – This is approached with a preliminary assessment and then detailed assessment of impacts on seascape. A brief assessment is provided of sixteen other seascape receptors. The detailed assessment assesses five Seascape Character Areas (SCAs): SCA 25 Skomer Island and Marloes Peninsula SCA 26 Skokholm and Gateholm coastal waters SCA 31 Outer Milford Haven SCA 34 Freshwater West SCA 35 Castlemartin coastal waters. Impacts are identified as moderate adverse (SCA 25 and 26) and moderate/minor adverse (SCA 31, 34 and 35). The impact on these SCAs were all identified as being not significant and to be indirect, long-term and reversible. These conclusions are justified and accepted.

The potential adverse seascape effects are extensive along the coast of the National Park. While agreeing individually with the conclusions on potential seascape effects, it is considered that the impacts are to a large area of the National Park and widespread and adverse.

*SLVIA Potential Landscape Effects* - The SLVIA identifies that the wind turbine generators will be distant from landscape receptors within the National Park.

*SLVIA Cumulative Effects* – ten projects were identified as potentially having cumulative impacts with the scheme. Four projects were scoped into the assessment and reasons provided why other projects were excluded. The four projects given detailed consideration were: Project Valorous Floating offshore wind farm of between 18-31 WTGs of up to 270m tip height. (at scoping stage); Rhoscrowther Wind Farm; META East Pickard Bay; META Dale Roads. This is considered to be a comprehensive and appropriately undertaken cumulative assessment.

*Mitigation of landscape and visual, seascape and landscape effects* – No additional measures are proposed, beyond standard mitigation being implemented.

The National Park Authority, has noted Policy SOC\_06 of the Welsh National Marine Plan, this policy states the following:

*“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.*

*Opportunities to enhance designated landscapes are encouraged.”*

It is the National Park Authority view that, while individually impacts may not be considered as significant, there are adverse effects across a large area the National Park. These adverse impacts cannot be directly mitigated, however they could be offset through enhancement of the National Park’s landscape. The National Park Authority has approached the developer regarding landscape enhancement and we request that the decision maker considers securing a scheme for landscape enhancement as part of any decision in accordance with Policy SOC\_06.

*Summary of opinion on SLVIA*

The SLVIA is considered to provide a reasonable assessment of the potential impact on the National Park of the offshore elements of the proposal. It also contains a clear narrative explanation to support the conclusions – these conclusions are considered to be reasonably justified. There are clear adverse seascape, visual and special quality impacts identified to the National Park and an explanation is provided why

these adverse effects are not considered to be significant in the Environmental Statement. The judgement inherent in concluding these adverse effects are not significant will require careful consideration in determining the Marine Licence. The widespread adverse impacts identified are also not mitigated and should be actively offset through the project funding appropriate landscape enhancement.

#### Landscape and Visual Impact (onshore)

The onshore elements of the proposal include a landfall and cable route through the National Park and the construction of the cable route and substation in the planning area of Pembrokeshire County Council. The Landscape and Visual Impact Assessment (LVIA) considers three landfall options: 1 – Horizontal Directional Drilling (HDD) under the beach and car park into the field to the east of the beach car park; 2 – HDD to above the cliff south of West Angle Bay; or, 3 - to open trench across the beach area and car park.

The LVIA considers the impact of the proposal on landscape features including: agricultural land, hedgerows and coastal landscape. The Authority accepts that the direct impacts on these landscape features can be appropriately mitigated.

Viewpoint 8 considers the impact of construction phase works at West Angle Bay. The Authority supports the view that HDD would have a less significant effect and supports option 2 or the other HDD approach to reduce impacts. The Authority accepts the conclusion that the Proposed Development will give rise to significant construction effects. For the onshore cable corridor these significant construction effects are localised and are limited to close proximity visual effects on high sensitivity receptors. The conclusion that there will be no residual significant effects to the landscape and visual resource as a result of the onshore cable corridor is accepted.

Consideration has been given to the impacts of development in the Pembrokeshire County Council planning area. The onshore substation is a large building, but will be limited in visibility from within the National Park boundary. This limited visibility is clearly shown within the Zone of Theoretical Visibility (ZTV) submitted. Viewpoint 4 (B4320, near Wogaston) is located on the boundary of the National Park and illustrates the likely impact of the onshore substation platform and building. To mitigate the impact of the substation woodland planting is proposed to its south this would mitigate some of the impact of the building. The impact of the building on this viewpoint is assessed as moderate-minor during construction, year 1 and year 15 and to not be significant.

In combination impacts have been identified these include the Greenlink Converter Station and the Rhoscrowther Wind Farm. These have been taken into account in the assessment and it appears have appropriately considered the cumulative effects with these potential developments.

The LVIA is considered to outline the impacts of development appropriately. It is noted that there are some significant impacts that relate to the National Park planning area. These are largely related to the construction stage activities and would be of relatively short duration. The Authority fully supports the proposed

mitigation in Section 21.8 of the Landscape and Visual Impact Assessment and this should be secured as part of any relevant consent.

#### Onshore Archaeology and Cultural Heritage

[Awaiting Consultation Responses – some likely significant effects are identified but are reduced to not significant by appropriate mitigation.]

#### Terrestrial and Coastal Ecology and Onshore Ornithology

[Awaiting Consultation Responses – mitigation and enhancement proposed is stated to result in beneficial effects for coast ecology and onshore ornithology.]

#### Other Offshore Impacts

The Authority notes that there are

#### **CONCLUSION**

In conclusion, the Pembrokeshire Coast National Park DO NOT OBJECT to this proposal. This view is subject to the securing of the mitigation proposed within the Environmental Statement. There remain adverse effects on the National Park and these are not fully mitigated, these adverse effects should be appropriately offset through landscape enhancements, secured as part of the development's requirements.

Yours faithfully,

Nicola Gandy MRTPI  
Director of Planning and Park Direction

CC: Pembrokeshire County Council

Planning and Environment Decisions Wales

**Date:** [draft] March 2022

**Contact:** Mr Matthew Griffiths

**Our Ref:** NP/22/0138/OBS

**Your Ref:** 3251528 - Erebus

Dear Sirs,

**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**

**Proposal:** Project Erebus Floating Offshore Wind Farm (Case reference number: 3251528 - Erebus)

**Location:** Celtic Sea and Angle Peninsula

I write in response to the above application made under Section 36 of the Electricity Act 1989. We were notified of this application, by the developer, on the 22 December 2021.

In a letter of the 25 February 2022 from Planning and Environment Decisions Wales, clarification was provided on the consultation process for this application and the associated application for a Marine Licence. The Authority has responded on the Marine Licence application separately and within this representation we have commented on the Environmental Statement and the environmental effects of the project. This includes our comments on the onshore elements of the proposal. It also contains comments on the legal and policy context to the National Park. The information is not re-iterated in this representation, and we request that this is taken into account in determining this application.

The Pembrokeshire Coast National Park DO NOT OBJECT to the application made under Section 36 of the Electricity Act 1989. This view is subject to the securing of the mitigation proposed within the Environmental Statement.

Yours faithfully,

Nicola Gandy MRTPI  
Director of Planning and Park Direction

ENC: Letter to Natural Resources Wales following consultation on Marine Licence.

CC: Pembrokeshire County Council