

REPORT OF THE DEVELOPMENT MANAGEMENT MANAGER ON APPEALS

The following appeals have been lodged with the Authority and the current position of each is as follows:-

<u>EC22/0088</u>	Unauthorised siting of polytunnel - Land at Llwyndrain Forest, Pentregalar, Crymych, Pembrokeshire, SA66 7SB
Type	Written Reps
Current Position	The initial documentation has been forwarded to PEDW
<u>EC23/0124</u>	Siting of touring caravan on land for residential use - Penygraig Uchaf, Cippyn, St. Dogmaels, Pembrokeshire, SA43 3LZ
Type	Written Reps
Current Position	The initial documentation has been forwarded to PEDW
<u>EC24/0080</u>	Unauthorised change of use of land as a dog exercise area for hire - Millcombe, Cosheston, Pembroke Dock, Pembrokeshire, SA72 4TU
Type	Written Reps
Current Position	The initial documentation has been forwarded to PEDW
<u>EC23/0125</u>	Installation of residential pod in field adjoining driveway – Land east of Bryntirion Lodge, Cippyn, SA43 3LS
Type	Hearing
Current Position	The initial documentation has been forwarded to PEDW
<u>NP/25/0113/FUL</u>	Change of use of agricultural field attached to mixed usage so that we can run a secure dog exercise field business - Millcombe, Cosheston, Pembroke Dock, Pembrokeshire, SA72 4TU
Type	Written Reps
Current Position	The initial documentation has been forwarded to PEDW
<u>NP/25/0373/FUL</u>	Siting of a Shepherds Hut within the curtilage for holiday let accommodation including creation of car parking space for one vehicle - Melrose, Cresselly, Kilgetty, Pembrokeshire, SA68 0TX
Type	Written Reps
Current Position	The initial documentation has been forwarded to PEDW
<u>NP/25/0538/FUL</u>	Alterations to front facade (Retrospective) - Herons Reef, Guildford Row, Llangwm Ferry, Haverfordwest, Pembrokeshire, SA62 4JN

Type Written Reps
Current Position The appeal has been dismissed and a copy of the Inspectors decision is attached for your information.

NP/25/0632/FUL New two storey dwelling with detached garage and detached annex - Plot adjacent to Coedmor, Dinas Cross, Newport, Pembrokeshire, SA42 0XQ

Type Written Reps
Current Position The appeal has been dismissed and a copy of the Inspectors decision is attached for your information.

NP/25/0668/FUL Application in retrospect for a first-floor timber decked balcony, with proposals to include an open rafter timber structure with solid panels at 1800mm high where necessary along with an extension to the existing balcony footprint - 60, Scandinavia Heights, Saundersfoot, Pembrokeshire, SA69 9PF

Type Written Reps
Current Position The appeal has been dismissed and a copy of the Inspectors decision is attached for your information.

NP/25/0698/TPO Removal of branch overhanging roof (TPO 98 G1) - Penybanc, 12, Catherine Street, St Davids, Haverfordwest, Pembrokeshire, SA62 6RJ

Type Written Reps
Current Position The initial documentation has been forwarded to PEDW

NP/25/0720/CLE Siting of caravan/ pod ancillary to lawful leisure use of parcel of land – Land east of Bryntirion Lodge, Cippyn, SA43 3LS

Type Hearing
Current Position The initial documentation has been forwarded to PEDW

NP/26/0036/FUL Small scale seasonal campsite - Land South of Parc Yr Eglwys, Dinas, Newport, Pembrokeshire, SA42 0SH

Type Written Reps
Current Position The initial documentation has been forwarded to PEDW

NP/25/0739/DOC Discharge Condition 5 (balcony enclosure) of NP/25/0302/FUL - Culverston, 16 Culver Park, Tenby, Pembrokeshire, SA70 7ED

Type Written Reps
Current Position The initial documentation has been forwarded to PEDW

APPLICATION REFERENCE: CAS-01352-L3N2P8

THE ELECTRICITY ACT 1989 – SECTION 36

THE TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 90

**LLŶR FLOATING WIND LIMITED - CONSTRUCT AND OPERATE AN OFFSHORE
GENERATING STATION IN THE CELTIC SEA AND ASSOCIATED
INFRASTRUCTURE, APPROXIMATELY 35KM OFFSHORE SOUTHWEST FROM
THE ANGLE PENINSULA ON THE PEMBROKESHIRE COAST**

Please see the attached Welsh Ministers decision letter in respect of the above. I
also attach a copy of the Inspector's Report for your information



Appeal Decision

by T Leck BA (Hons) MSc

an Inspector appointed by the Welsh Ministers

Decision date: 17/08/2026

Appeal reference: CAS-04956-K1Y2R5

Site address: Herons Reef, Guildford Row, Llangwm Ferry, Haverfordwest, SA62 4JN

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Chris Cunningham against the decision of Pembrokeshire Coast National Park Authority.
 - The application Ref NP/25/0583/FUL, dated 08 October 2025, was refused by notice dated 19 December 2025.
 - The development is alterations to front façade (retrospective).
 - A site visit was made on 28 July 2026.
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Decision

1. The appeal is dismissed.

Procedural Matter

2. The development carried out on site is inconsistent with the scaled plans in regard to the design of the ground floor window and the proportions of the door. Nonetheless the disputed matter relates solely to the facia materials, as such it has not been necessary to seek clarification on this minor discrepancy given that it has no bearing on my decision.

Main Issues

3. The main issues are the effect of the development on the character and appearance of the area, having regard to its location within the Pembrokeshire Coast National Park, and whether the development complies with planning policies that seek to achieve sustainable design.

Reasons

4. The appeal relates to a detached dwelling located in a small group of residential properties at Guilford Row. The dwellings in the immediate area feature varied design and external materials, including smooth and rough cast render and some finished with natural stone.
5. The appeal dwelling is a narrow and elongated building that fronts the lane. It exhibits a simple form with a front facing gable and limited architectural detailing. The dwelling, particularly its shape and form, is notably more modern than some of the traditional cottages nearby. Photographs have been provided to show that previously the dwelling

was finished with grey stonework at ground level and smooth render above painted blue. The front elevation is now finished with blue-grey stone slips and dark grey uPVC horizontal cladding above the first floor windows. Together with the anthracite grey fenestration, this gives the dwelling a distinctly contemporary appearance.

1. The appellant accepts that the grey horizontal cladding has an adverse visual impact and intends to remove it. However, no details have been provided of an alternative finish. I have therefore, in the interest of fairness, assessed the scheme as considered by the Authority, comprising both the stonework and the horizontal cladding as combined components that make up the front elevation.
2. The dark grey cladding results in a stark and obviously synthetic feature that draws the eye, particularly as it is installed within the visually prominent front gable. Its position immediately above the upper windows disrupts the building's otherwise simple form and proportions. As a result, the horizontal cladding appears incongruous and introduces a material that is at odds with the character of the area.
3. The stonework is blue grey toned with some rust colouring and consists of small rectangular blocks laid in an irregular pattern with no visible pointing. This gives it a more contemporary appearance than traditional buff stonework. However, in isolation, it would be compatible with the dwelling's modern character, and the contemporary anthracite grey windows accepted by the Authority. Furthermore, the surrounding dwellings display a variety of finishes, including some in bright colours. In this varied context, and when considered on its own, the stonework does not appear incongruous. Nevertheless, when viewed alongside the horizontal cladding, the overall composition of the front elevation appears awkward and unbalanced. The relationship between these contrasting materials lacks coherence resulting in an appearance that detracts from the host dwelling and the street scene.
4. The appeal site lies within Landscape Character Area 28 Daugleddau and the Milford Haven Waterway Registered Landscape of Outstanding Historical Interest. Within this much larger landform, the development's effects would be localised and would not extend to the wider landscape. The development therefore does not have an unacceptable adverse effect on the qualities or special landscape of the PCNP and does not materially conflict with the wider strategic objectives of LDP Policies 8 or 14. However, the localised harm I have identified conflicts with LDP Policy 29, which requires development to be well designed in terms of place and local distinctiveness.
5. The Authority also identifies conflict with LDP Policy 29 on the basis that the materials are not sustainable. The appellant accepts that the uPVC horizontal cladding is not a sustainable material, and I agree. The Authority refers to the stonework as cladding, which the appellant has confirmed is natural stone slip cladding. On my site visit, the stone slips appeared to have variations in tone, texture and shape typical of natural stone. No evidence has been provided to show that the stone is artificial. Natural stone is accepted in the Authority's Sustainable Design and Development supplementary planning guidance. However, as the development includes uPVC horizontal cladding, I find that it does not comply with LDP Policy 29 insofar as it seeks to secure the use of sustainable materials.

Other Matters

6. I have considered whether a condition to require a scheme of alternative materials to be agreed with the Authority would overcome the above harm. However, without any specific details or certainty that that an acceptable solution could be achieved, I cannot be satisfied that such a condition would be effective.

7. I acknowledge the appellant's circumstances, in that the works were carried out by the former owner and that they now are responsible for remedying the matter. However, this does not alter my assessment of the planning merits of the appeal proposal.

Conclusion

8. For the above reasons, and having regard to all matters raised, I conclude that the appeal should be dismissed.
9. In reaching my decision, I have taken into account the requirements of sections 3 and 5 of the Well-Being of Future Generations (Wales) Act 2015. I consider that this decision is in accordance with the Act's sustainable development principle through its contribution towards one or more of the Welsh Ministers' well-being objectives.

T Leck

INSPECTOR



Appeal Decision

By **A L McCooey BA (Hons) MSc MRTPI**

an Inspector appointed by the Welsh Ministers

Decision date: 07/08/2026

Appeal references: CAS-04836-B5F9F2

Site address: Plot adjacent to Coedmor, Dinas Cross, Newport, Pembrokeshire, SA42 0XQ

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a failure to give notice within the prescribed period of a decision on an application for planning permission.
 - The appeal is made by Mr Richard Gambold against the Pembrokeshire Coast National Park Authority.
 - The application Ref NP/25/0632/F is dated 6 November 2025.
 - The development proposed is a two storey dwelling with detached garage and detached annex.
 - A site visit was made by the Inspector on 29 July 2026
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Decision

1. The appeal is dismissed and planning permission is refused.

Background and Procedural Matters

2. The submitted appeal was against a failure to determine the application within the prescribed period. However, within several days of submission the National Park Authority (NPA) refused the application. The appellant immediately submitted a revised statement of case confirming that the appeal is against refusal of planning permission. I shall therefore consider the appeal on that basis.

Main issues

3. The main issues are:
 - The effect of the proposal on the character and appearance of the area having regard to its location within Pembrokeshire Coast National Park.
 - The effect of the proposal on highway safety along the A487(T).
 - The effect of the proposal on the living conditions of adjoining occupiers.

Reasons

4. The site is a relatively narrow plot within Dinas Cross, with frontage onto the A487(T). There is a mature hedge bank and small watercourse to the southwest boundary, where the adjoining dwelling is set back by a substantial side garden. There is a post and rail fence along the other side boundary with the adjoining bungalow.

The effect on character and appearance of the area

5. There have been several planning permissions on the site over the years, the last being for a 2 storey dwelling approved in February 2020. However, this planning permission lapsed some years ago and can be accorded little weight. The NPA, whilst confirming that the principle of a dwelling in this location is not at issue, notes that the policy context has changed since the planning permission was granted, both in terms of national policy in Planning Policy Wales (PPW) and with the adoption of a new Local Development Plan (called LDP2) in September 2020.
6. One of the defined special qualities of the NP in LDP2 is the distinctive settlement character. Policy 8 sets priorities to protect the special qualities including ensuring that: The identity and character of towns and villages is not lost ... through the poor design and layout of development. Policy 29 Sustainable Design reinforces this by requiring proposals to be well designed in terms of place and local distinctiveness. The management guidance for the Dinas Head Landscape Character Area (LCA) states that any future development should consider the siting, layout, form and construction materials to ensure that they are in keeping with the existing character of traditional built form in this landscape.
7. In common with LDP2, PPW promotes sustainable design for all development stating that the special characteristics of an area should be central to the design of a development. The layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations (3.9). In areas recognised for their particular landscape, townscape, cultural or historic character and value it can be appropriate to seek to promote or reinforce local distinctiveness. In those areas, the impact of development on the existing character, the scale and siting of new development, and the use of appropriate building materials will be particularly important (3.10). The importance of context and considering place is a very important facet of good design. Technical Advice Note 12 Design echoes these themes.
8. The proposal comprises a triple garage with a low mono-pitch roof positioned close to the road, a two-storey dwelling, and an annexe to the rear, also with a low mono-pitch roof. Whilst the dwelling would incorporate traditional materials, including a slate roof and rendered walls, its overall design departs significantly from the character of the surrounding settlement. The dwelling would comprise a principal block with a smaller recessed wing set at an angle, resulting in a reduced frontage to that element. The design also incorporates extensive glazing, with windows of varying sizes and shapes arranged asymmetrically. The contemporary appearance of the proposal shows limited regard to the prevailing character and appearance of development within Dinas Cross. No design statement or other compelling justification has been provided to explain how the design responds to its context or represents an appropriate solution for this prominent site within the National Park. The appellant's assessment of local character is limited and relies primarily on photographs of a small number of larger dwellings which are said to provide comparators. However, whilst some of those properties may be similar in scale, they are traditional in form and appearance and do not reflect the design approach proposed here. Furthermore, the proposal does not meaningfully address the NPA's concerns regarding its form or the extent and pattern of glazing on the front elevation. Taken as a whole, the design, scale, form and glazing of the proposal would appear incongruous and out of character with both the immediate surroundings and the wider settlement of Dinas Cross.

9. The siting of the garage forward of the proposed dwelling was raised as being out of character with the area. The appellant refers to 3 examples of garages close to the road in the settlement. Two are older buildings and one is a recently approved garage. None of the examples are in front of the dwelling, rather they are located to the side. The proposed garage would be directly in front of the dwelling on this relatively narrow plot. There would be some screening by the proposed stone wall, but the garage would still be readily visible. This relationship between house and garage on this site would be out of character with the form of the existing dwellings in the settlement.
10. The appellant's counter arguments on over-development concentrated on plot ratios, the accuracy of which I do not dispute. The scale and form of the development, consisting of three buildings, two of which would be evident from the road outside, would lead to a strong impression of a concentration of development when viewed from the road. The scale and siting of the proposal would be out of character with the prevailing pattern of development and would be detrimental to the character and appearance of the area for these reasons.
11. The appellant suggests that minor amendments to the design could address the issues raised by the NPA. No further details have been provided and in any event, article 26C of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 prevents any variation of applications at the appeal stage. It would not be appropriate for me to comment on what could be considered to be acceptable as an amendment, as to do so could fetter future consideration of proposals on the site.
12. For all the reasons given above I conclude that the proposal would have an adverse effect on the character and appearance of the area, within Pembrokeshire Coast National Park, contrary to LDP2 Policy 29 and Policy 8, as well as the relevant guidance in the LCA management guidance, PPW and Technical Advice Note 12.

The effect on highway safety

13. The access is direct onto the trunk road within a 20mph zone on the inside of a gradual bend. At the application stage, the Welsh Government, as Highway Authority (HA) for the A487 trunk road, had directed that planning permission should not be granted due to insufficient information being provided. The appellant has provided information to demonstrate that the visibility requirements of the Design Manual for Roads and Bridges (DMRB) CD 123 as set out in the HA's consultation response would be met at the proposed access. Whilst the information is not in the format requested by the HA, it does demonstrate that the required visibility splays and forward visibility (stopping sight distance) can be achieved in both directions. There would be no obstructions in the visibility splays nor do they encroach on third party land. My observations during my site visit confirm that the HA's requirements can be met.
14. The HA response at appeal stage recommends that all its points are addressed prior to any determination and as noted above this is the case. A road risk assessment has been undertaken, which concludes that the risks associated with the development are low. A similar conclusion was reached in the screening direction issued by PEDW. The HA recommends two conditions in the event that the appeal is allowed. I therefore consider that the issues raised by the HA have been addressed.
15. For these reasons, I conclude that the proposal would not be detrimental to highway safety and as a result would comply with Policy 60 of LDP2 and national policy and guidance on highway safety.

The effect of the proposal on the living conditions of adjoining occupiers

16. Whilst not a reason for refusal, this issue is raised as a concern in the NPA's evidence. LDP Policy 30 seeks to protect amenity and the quality of the environment currently enjoyed by people living, working or visiting the Park. The NPA had raised concerns regarding overlooking of adjoining dwellings and garden areas. The concerns related to overlooking from a landing window (not a habitable room) and of a part of the substantial gardens of the adjoining dwelling from small secondary bedroom windows. Despite raising this matter, the NPA concluded that any issues could have been addressed by conditions on a planning permission. I agree and consider overlooking issues would not be a reason to refuse planning permission.
17. The proposed dwelling would be sited to the side of the adjoining bungalow. There are two windows on that side of the bungalow and the side window of a conservatory. I consider that there would be some loss of outlook, but that the main outlook to the front and rear would remain. There would be a separation distance of around 5.5m between the two side elevations and the height of the proposal would be lower given the hipped roof arrangement on that side elevation. On balance, I consider that the proposal would be acceptable in this regard. Overall, I conclude that the proposal would therefore comply with LDP2 Policy 30.

Other matters

18. The NPA also refers to the need to apply the precautionary principle due to uncertainty in respect of potential loss of green infrastructure and adverse impacts on protected and priority species and habitats as a result of the site clearance which has already taken place and the absence of a preliminary ecological survey. There has been a possible conflict with paragraph 6.4.16 of PPW because pre-emptive site clearance works have taken place before this planning application was submitted. However, that is not the end of the matter, the guidance states that habitat status can be established through evidence remaining on site and local desk-based assessments.
19. An Ecology report from December 2019 accompanied that planning application. This identified that the limited ecological value was confined to the existing hedge banks and small stream located near the boundary. Whilst this survey is out of date, it identifies the site condition at that time and for some years before that date. There is evidence that the site is mainly semi-improved grassland and was subject to regular mowing. Photographic evidence from 2024 demonstrates this. The tree impact assessment concludes that there would be no adverse impacts on the existing trees and hedges as a result of the proposal. The assessment notes that there has been some coppicing of the hedges and suggests that this has not affected the ecological value of the site. NRW were consulted on the appeal and have confirmed that protected species are not likely to be affected by the proposals. I consider that the habitat status has not significantly changed since the last planning permission was granted. Biodiversity enhancements could be secured by an appropriate condition. The available evidence and planning history of the site leads me to conclude that the proposal would comply with legislation on the conservation of species and habitats, PPW and LDP2 policies 1, 10, 11, and 14.
20. As I am dismissing the appeal, the submitted draft planning obligation addressing a contribution to affordable housing does not fall to be considered further.

Conclusion

21. For the reasons given above and having regard to all other matters raised, I conclude that the appeal should not succeed and that planning permission should be refused.
22. In reaching my decision, I have taken into account the requirements of sections 3 and 5 of the Well-Being of Future Generations (Wales) Act 2015. I consider that the decision is in accordance with the Act's sustainable development principle through its contribution towards one or more of the Welsh Ministers' well-being objectives.

A L McCooey

INSPECTOR



Appeal Decision

by T Leck BA (Hons) MSc

an Inspector appointed by the Welsh Ministers

Decision date: 17/08/2026

Appeal reference: CAS-05102-M1T7Z4

Site address: 60 Scandinavia Heights, Saundersfoot, Pembrokeshire, SA69 9PF

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Mr Craig Purnell against the decision of Pembrokeshire Coast National Park Authority.
 - The application Ref NP/25/0668/FUL, dated 17 November 2025, was refused by notice dated 03 March 2026.
 - The proposed development is described as 'Application in retrospect for a first floor timber decked balcony, with proposals to include an open rafter timber structure with solid panels at 1800mm high where necessary along with an extension to the existing balcony footprint'.
 - A site visit was made on 28 July 2026.
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Decision

1. The appeal is dismissed.

Procedural Matters

2. At the time of my site visit, the balcony was partially installed but not complete. Notwithstanding the description given in the application and for the avoidance of doubt, my decision is made on the basis of the plans considered by the Authority.

Main Issue

3. The main issue is the effect of the development on the character and appearance of the area, having particular regard to its location in Pembrokeshire Coast National Park.

Reasons

1. The appeal site comprises a semi-detached bungalow with a gently pitched roof. Nearby properties are also predominantly bungalows, many of which share their design with the appeal dwelling. Although there are some split level and two-storey dwellings in the wider estate, the immediate area is generally characterised by low profile dwellings. Roof alterations are largely limited to solar panels, rooflights and flues. The limited height and consistent roofscape contribute to the cohesive character of the area.

2. The proposed balcony would sit on the flat roof of a side projection, between the dwelling's roof and the neighbouring mono-pitched outbuilding that runs along the shared boundary. The balcony is proposed with timber balustrading and a timber frame over the balcony area and the access steps, which would reach a height broadly comparable with the dwelling's ridge. The balustrading and frame would extend well above the dwelling's eaves and rear roof pitch, creating an isolated and discordant feature that would appear at odds with the relatively consistent and uninterrupted roofscape in this area.
3. Although the balcony would be set back from the front of the dwelling and would be partly screened by the neighbouring outbuilding, the balustrading and frame would still be visible in glimpsed views from the front of the site. Nevertheless, the proposed development would be visually prominent from the public realm to the side of the attached semi-detached plot, and from neighbouring properties and their gardens. Long-range views would be limited, however localised visual impacts would be significant, due to its design, height, siting and visual prominence.
4. Some other properties in the estate have balconies with varied design and use of materials. However, they are at ground floor or integrated into the first floors of the dwellings, and do not extend beyond or sit above the associated roof planes. I also saw that timber has been used elsewhere within the estate, including for car ports, sheds and fences. However, these features were also at lower levels and visually integrated into the associated sites.
5. The proposed development would appear as a visually prominent alien feature sitting above the rear roof plane and would fail to harmonise with the dwelling or the wider street scene. I therefore find the development would have a harmful effect on the character and appearance of the area.
6. In the context of the wider strategic objectives of Policies 8 and 14 of PCNP Local Development Plan (LDP), and given the domestic scale of the development and that the harm I have identified would be contained to the immediate residential area, there would not be any significant impacts on the qualities or special landscape of the PCNP or the Landscape Character Area 1 Saundersfoot Settled Coast. However, the localised harm I have identified would be significant and the development would therefore harm the character and appearance of its surroundings, contrary to LDP Policy 29 which requires development to be well designed in terms of place and local distinctiveness, and LDP Policy 30 which states that development should not be visually intrusive. In this respect, it would also conflict with the design principles contained within Technical Advice Note 12.

Other Matter

7. I acknowledge the appellant's point that the Authority did not respond to queries raised. However, this is a matter for the Authority and does not affect my assessment of the planning merits of the appeal proposal.

Conclusion

8. For these reasons, and having regard to all matters raised, I conclude that the appeal should be dismissed.
9. In reaching my decision, I have taken into account the requirements of sections 3 and 5 of the Well-Being of Future Generations (Wales) Act 2015. I consider that this decision is in accordance with the Act's sustainable development principle through its contribution towards one or more of the Welsh Ministers' well-being objectives.

T Leck

INSPECTOR



Ein cyf/Our ref CAS-01352-L3N2P8
Marc Murray
Development Director
Llyr Floating Wind Limited
The Boathouse
Hawcraig Road
Aberdour
BURNTISLAND
KY3 0TZ

29 July 2026

Dear Marc Murray

THE ELECTRICITY ACT 1989 – SECTION 36
THE TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 90
LLŶR FLOATING WIND LIMITED
CONSTRUCT AND OPERATE AN OFFSHORE GENERATING STATION IN THE CELTIC
SEA AND ASSOCIATED INFRASTRUCTURE
APPROXIMATELY 35KM OFFSHORE SOUTHWEST FROM THE ANGLE PENINSULA
ON THE PEMBROKESHIRE COAST

APPLICATION REFERENCE: CAS-01352-L3N2P8

1. A Planning Inspector appointed by the Welsh Ministers has considered the above application made under section 36 of the Electricity Act 1989 (“section 36 application”) and the application for deemed planning permission sought under section 90 of the Town and Country Planning Act 1990 (“deemed planning permission”).
2. The Inspector has provided a report with recommendations for consideration by the Welsh Ministers. A copy of the Inspector’s report (IR) is enclosed. All references to paragraph numbers relate to the IR, unless otherwise stated.
3. The Inspector also provided an addendum report following the introduction of the Conservation and Habitats Species (Offshore Wind) (Amendment etc.) Regulations 2026 and publication of UK Government guidance regarding compensatory measures for offshore windfarms that would have adverse impacts on Special Areas of Conservation and Special Protection Areas. This guidance also applies to Welsh

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn yr iaith honno ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

offshore waters. The Inspector concluded the amended regulations and guidance did not have a bearing on their considerations and conclusions of the application.

Inspector's Assessment

4. The IR (IR 6 – 63) provides a background to the project, summarises relevant legislation, policy, guidance and representations received.
5. I agree with the Inspector, the main issues regarding the section 36 application and deemed planning permission are the impact of the proposed development on:
 - the seascape viewed from the Pembrokeshire Coast National Park;
 - the landscape of the Angle Peninsula; and
 - ecology.
6. However, I also consider a key issue is the economic and renewable energy benefits of the scheme, which I discuss later in this letter.

Seascape viewed from the Pembrokeshire Coast National Park

7. The Inspector notes the applicant chose 15 daytime and three night time vantagepoints, 14 of which were from Skomer Island in the west to Caldey Island in the east, and another from Lundy Island in the Bristol Channel (IR 65).
8. The Inspector visited many of the vantage points and is satisfied the photomontages provided by the applicant are an accurate representation of what may be seen from the vantage points (IR 66).
9. In addition to visiting the vantage points accessible by car, the Inspector walked stretches of the coast path and concluded that other than stretches within Milford Haven, the turbines would be visible from the majority of the coastal path from Martin's Haven to Manorbier Beach, and likely beyond. The Inspector also noted the wide, open and unspoilt seascapes are a significant contributor to the sense of remoteness and tranquillity which Policy 8 of the Pembrokeshire Coast National Park Authority's Local Development Plan (PCNP LDP) seeks to preserve (IR 67).
10. The Inspector notes that the extent to which the turbines would protrude above the horizon depends on distance and elevation, with photomontages provided by the application showing that in addition to the turbine blades, sections of the towers would also be visible in all cases and from a long stretch of the coast, particularly on clear days. In doing so, the Inspector states the moving blades would draw the eye to the turbines, thereby exacerbating their adverse visual impact on the seascape (IR 68-69).
11. Based on the assessment detailed in IR 65-70, the Inspector concludes the proposed development would have a significant detrimental impact on the seascape viewed from the Pembrokeshire Coast and, therefore, would conflict with Policy 17 "Renewable and Low Carbon Energy and Associated Infrastructure" of Future Wales (FW), PCNP LDP Policies 8 "Special Qualities (Strategy Policy)" and 14 "Conservation and Enhancement of the Pembrokeshire Coast National Park", and Policies SOC_06 "Designated Landscapes" and SOC_07 "Seascapes" of the Welsh National Marine Plan ("Marine Plan") (IR 71).

12. The Inspector has also considered the cumulative impact of neighbouring floating wind farms which have been consented, notably, Erebus and White Cross. Although closer to the coast, the turbines for the Erebus project would be smaller than those proposed as part of this application, at 270 metres. White Cross, off the north Devon coast, would be 18 kilometres from the proposed wind farm which is subject of this application, with wireframes and photomontages showing only the tips of the blades would be visible. However, all three windfarms would be visible from the Pembrokeshire coast and together, occupy a wide arc of view from the coast with a significant adverse cumulative impact on the seascape (IR 72).
13. The Inspector notes the applicant and Pembrokeshire Coast National Park Authority have agreed a Landscape Enhancement Scheme, with a fund of £250,000 to be secured through a Section 106 Agreement. However, the Inspector states that at the time of drafting their report, the Section 106 Agreement had not been submitted and therefore, it is not clear what a Landscape Enhancement Scheme would entail (IR 74-75).
14. Furthermore, the Inspector is of the opinion that it would be difficult to see how adverse visual impacts from the proposed development could be appropriately mitigated without blocking views of the sea, which the Inspector states would have a greater adverse impact. The Inspector also fails to see how landscape enhancements elsewhere in the National Park could be considered to be necessary to make the development acceptable or be directly related to the proposed wind turbines (IR 75).

The landscape of the Angle Peninsula

15. The Inspector notes the offshore cable would join the onshore cable above the beach at Freshwater West and be achieved by horizontal directional drilling and therefore, not seen at all. The alternative would be to dig a trench, although the Inspector states that any impacts caused by trenching or construction compounds would be temporary and sites restored to their previous condition (IR 76).
16. The proposed substation would be in the open countryside in the heart of the Angle peninsula and within the Rhoscrowther Historic Landscape Character Area which remains largely rural. The Inspector notes there are two options for the substation, with either all the equipment exposed or partially housed in a building. Under both options, the compound would be enclosed by a 2.4 metre steel palisade security fence and include a control building, and although it would be surrounded by new landscaping screening, the Inspector states this would not be sufficient to hide a large industrial shed within the open countryside. Taking all these matters into account, the Inspector concludes the proposed development would be significantly at odds with the rural setting and would have an adverse impact on the character and appearance of the area and historic landscape, which conflicts with Policy 17 "Renewable and Low Carbon Energy and Associated Infrastructure" of FW and policies GEN.1 and GEN.2 of the Pembrokeshire County Council Local Development Plan (IR 77 - 80).

Ecology

17. The Inspector notes Natural Resources Wales (NRW), the Royal Society for the Protection of Birds (RSPB) and the Joint Nature Conservation Committee (JNCC) all raised a number of concerns regarding the methodology used to assess the impact of the proposed turbines on bird populations. Following additional information provided by the applicant, NRW were largely content and, in terms of Environmental Impact Assessment (EIA), accepted there would be no significant environmental effects. RSPB did not respond to the additional information. The Inspector considers NRW's position as expert advisors to the Welsh Government should be afforded significant weight and that they would not recommend issuing a Marine Licence if there were unacceptable impacts on protected species (IR 81 – 82).
18. Onshore, the proposed landfall would be adjacent to the Broomhill Burrows Site of Special Scientific Interest. The Inspector is confident that through horizontal directional drilling there are no direct ecological impacts on habitats or plant species anticipated. Furthermore, the application is supported by surveys for bats, dormice, otters, water vole, badgers, breeding birds and wintering birds and subject to conditions, NRW are satisfied the proposed development would not have any adverse ecological impacts (IR 83).
19. The Inspector is satisfied that, subject to the requirement of a Construction Environment Management Plan (CEMP) and a Landscape Ecological Management Plan (LEMP), both of which would be secured by condition, the proposed development would not have an unacceptable impact on ecological interests. It would therefore comply with Policies 9 and 17 of FW, Policy GN.37 of the Pembrokeshire County Council Local Development Plan, Policies 10 and 11 of the Pembrokeshire Coast National Park Authority Local Development Plan and Policy ENV_01 of the Marine Plan (IR 84).

Other Matters

Agricultural Land

20. The impact of any trenches needed to lay the onshore cable would be minor in terms of area, temporary and can be controlled by a Soil Management Plan. On that basis, the Inspector saw no need to require further surveys (IR 85).

Strategy

21. The Inspector acknowledges a co-ordinated approach to the provision of the proposed cable routes through the peninsula would be sensible, although outside the remit of this application (IR 86).

Transport

22. The Inspector notes the wind turbines would be floated into position from where they are constructed and the construction of the substation is unlikely to involve materials and equipment being transported by abnormal loads. Therefore, the Inspector does not consider a structural assessment or conditions survey of the A477 sought by the

Welsh Government Transport Division necessary. The highway authority have no objection, subject to road improvements and a Construction Traffic Management Plan, which would be secured by condition (IR 87).

Historic Assets

23. Cadw raised concerns regarding the proposed development and the direct impact it would have on five schedule monuments, which are considered to be of high value, with the impact being assessed as major adverse. As a result of these concerns, the Inspector notes the development area has been revised to exclude ancient monuments at Freshwater West and as a result, impact on archaeological remains is not considered to be significant (IR 56 and 88).
24. The Inspector does not consider the proposed development would have an impact on the setting of the Grade II listed Somerton Farmhouse (IR 89).

Living Conditions

25. The Inspector notes that, other than a cottage within a few metres of the proposed substation, no residential properties would be affected by the proposed development and the living conditions of those occupying the cottage could be safeguarded through conditions regarding noise and working hours during construction and operation (IR 90).

Inspector's Conclusions

26. In terms of ecology, neither RSPB nor the JNCC commented on the additional information provided by the applicant. However, the Inspector notes NRW are now content adequate mitigation can be put in place and considers NRW would not recommend the issue of a Marine Licence if it were not satisfied there would be no unacceptable impact on protected species or habitats (IR 94).
27. The Inspector is also satisfied there should be no harm to terrestrial ecological interests and no impacts on highway safety or living conditions, subject to conditions to help ensure this (IR 95).
28. In terms of complying with national policy, the Inspector acknowledges the proposed development would contribute towards national targets for generating electricity by renewable energy set out in Policy 17 of FW and achieving Wales's ambitions for net zero carbon. In addition, the Inspector states that, should the project demonstrate the effectiveness of floating offshore wind, it would pave the way for more clean energy to meet these targets (IR 96 – 97).
29. The Inspector acknowledges around 2,000 jobs would be created during construction, in addition to jobs associated with the operation of the substation. There would also be training opportunities and jobs created in the supply chain, all of which weigh in favour of the proposal (IR 97).
30. However, whilst the Inspector acknowledges there would be days where weather conditions would limit visibility to the extent the turbines would not be visible, on clear

days, the turbines would inevitably have an adverse impact on the seascape viewed from the coast and the sense of remoteness and tranquillity from the coast path. Furthermore, the Inspector considers that on clear nights, lights from the turbines would have a similar adverse impact and it is unclear on how these impacts can be mitigated. In terms of the proposed substation, the Inspector concludes this would also have an adverse impact on the character and appearance of the area (IR 98).

31. Given the Pembrokeshire Coast National Park is the only coastal National Park in Wales and the UK, the Inspector considers the proposed development would have a significant adverse impact on the National Park, being in direct conflict with its statutory purpose (IR 99).
32. The Inspector recommends both the section 36 application and deemed planning permission are refused (IR 100).

Welsh Ministers' Determination

33. The Welsh Ministers agree with the Inspector's assessment of the project's impacts, including the identification of the main issues but consider the economic and renewable energy benefits of the scheme are also significant considerations. They also disagree with the relative weight given to the adverse environmental impacts compared to the weight given to the contribution of the proposals to supporting the economic growth and progress towards renewable energy objectives.
34. The Welsh Ministers agree with the Inspector's assessment of the project's impact on the seascape and acknowledge the significant adverse impact on the National Park. The development requires careful consideration against the National Park purposes under section 11A of the National Parks and Access to the Countryside Act 1949. The Welsh Ministers therefore give significant weight to conserving and enhancing the National Park in this decision, which draws towards refusing the application.
35. The Inspector, in concluding the proposed development would have a significant detrimental impact on the seascape identified the proposal would conflict with Policy 17 of FW, Policies 8 and 14 of the PCNP LDP and Policies SOC_6 and SOC_7 of the Marine Plan (IR 71). The Welsh Ministers note the policy conflict of the adverse seascape, landscape and visual impacts of the development, including that relating to the onshore sub-station. The Welsh Ministers do, however, note the conclusions reached by the NRW Marine Licencing Team (NRW MLT) when granting the project a marine licence (Application reference no: ORML2465) in respect of Policy SOC_07 of the Welsh National Marine Plan.
36. Policy SOC_07 states that:
'Proposals should demonstrate how potential impacts on seascapes have been taken into consideration and should, in order of preference: a) avoid adverse impacts on seascapes; 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 seascapes are encouraged.'

37. In section 5.1.8 of their Marine Licencing Decision Document NRW MLT notes that while the applicant reduced the proposed height of the turbines from 325.5 metres to 300 metres to reduce the seascape impacts, adverse impacts remain.
38. The applicant submitted further information to the Inspector in December 2025 which was subject to consultation (IR 4). The subsequent consultation on the further information ran concurrently with additional information sought by NRW MLT.
39. The information provided by the applicant included a paper outlining the 'Strategic Need for the Llŷr Project'. The statement argues the Llŷr Project is a test and demonstration floating offshore wind development that responds directly to UK and Welsh policy priorities on net zero, energy security and sustainable economic growth. It aligns strongly with the Marine Plan, by maximising renewable energy generation while addressing environmental, social and cumulative impacts. The project's primary benefit is its role as a catalyst for the emerging floating offshore wind sector. By deploying commercial-scale turbines, Llŷr will look to de-risk technology, validate designs and accelerate cost reductions while increasing investor confidence and enabling future gigawatt-scale projects. Llŷr also supports key national strategies, including the UK Clean Power 2030 Action Plan and longer-term net zero targets. It contributes to the need to significantly expand low-carbon electricity generation while improving energy security and reducing long-term energy costs. Economically, the project delivers substantial regional and national benefits. It will stimulate supply chain development, create employment in Pembrokeshire and across Wales. Importantly, Llŷr will also enable improved understanding of environmental interactions at a manageable scale, allowing mitigation measures to be tested before large-scale rollout.
40. NRW MLT consider the paper provides a convincing case for proceeding despite impacts on seascapes remaining, in compliance with Policy SOC_07. The Welsh Ministers agree with this position.
41. Given Policy SOC_06 sets out a similar sequential approach to that of Policy SOC_07, in light of the convincing case set out above, the Welsh Ministers conclude that the proposal also complies with this policy.
42. The Marine Plan encourages opportunities to enhance designated landscapes. The Applicant has produced a proposal for a landscape enhancement scheme. This would provide compensatory measures for the harm caused to both the seascape and landscape, recognising the harm cannot be readily mitigated. However, it is not possible for the Welsh Ministers to properly consider the lawfulness of this scheme without a signed agreement. They note the Inspector's conclusions that a section 106 agreement would not be lawful (IR 74, 75). In the absence of a signed agreement, the Welsh Ministers have not taken account of the mitigation scheme in determining this application for this reason.
43. The Inspector notes the benefits that weigh in favour of the proposal (IR 96, 97). The proposed wind farm would generate enough renewable electricity to power around 100,000 homes. The proposed development would contribute to meeting national targets for generation of electricity by renewable energy and achieving Wales' ambitions for net zero carbon. In addition, should as it is hoped, the project demonstrates the effectiveness of floating offshore wind, it would pave the way for the

production of more, clean energy to meet these targets. Around 2,000 jobs would be created during construction and new jobs associated with the operation of the substation. There will be training opportunities and jobs created in the supply chain.

44. While recognising the adverse landscape and seascape impacts, contrary to the view of the Inspector I consider the benefits outweigh the conflict. Further, I consider the case put forward to fulfil the sequential approach of policies SOC_06 and SOC_07 of the Marine Plan is sufficient to justify why the project should proceed despite significant adverse impacts.
45. Having regard to the biodiversity measures identified in the application, and summarised in the Inspector's report, the Welsh Ministers are satisfied the relevant duty under section 6 of the Environment (Wales) Act 2016 has been complied with.
46. The Welsh Ministers are satisfied the development can be satisfactorily decommissioned and will take steps to ensure that where any Decommissioning Programme is required under the Energy Act 2004, such programme is prepared in a timely fashion by imposing a condition requiring its submission to the Secretary of State before the commencement of the development (Annex 1).
47. The development includes provision for an underground grid connection cable and sub-station for connection to the national grid at Pembroke Power Station. Therefore, the Welsh Ministers are satisfied the power generated by the project can be delivered to the electricity supply network.
48. Navigation and fisheries issues have been addressed through the Marine Licence granted by NRW.

Decision

49. The Welsh Ministers hereby grant consent under section 36 of the Electricity Act 1989 for the construction and operation of the development described in application ref: CAS-01352-L3N2P8 and in Annex 1, subject to the conditions therein, and give a direction which grants deemed planning permission under section 90(2) of the Town and Country Planning Act 1990.

Environmental Impact Assessment

50. On 12 September 2019, the Welsh Ministers, under regulation 39 of the Electricity Works (Environmental Impact Assessment) (England and Wales) Regulations 2017, deferred the assessment of any significant effect on the environment to NRW which has subsequently undertaken an assessment under the Marine Works (Environmental Impact Assessment) Regulations 2007.
51. NRW issued the marine works EIA decision on 19 June 2026, concluding the environmental impacts of the project have been adequately identified, described and assessed. Accordingly, NRW granted EIA consent.

Habitats Regulations Assessment

52. For applications made under section 36 of the Electricity Act 1989, the Welsh Ministers are the competent authority and NRW is the competent authority in respect of applications for a Marine Licence in the Welsh inshore and offshore areas. Regulation 67 of the Conservation of Habitats and Species Regulations 2017 (“the Habitats Regulations”) provides for co-ordination in cases when an appropriate assessment is required and where more than one competent authority is involved. On 10 December 2020, Welsh Ministers confirmed in writing that implications for works seaward of the mean high watermark affecting European Sites should be assessed by NRW. Furthermore, Welsh Ministers, under regulation 67(2) of the Habitats Regulations, stated their intention to adopt any assessment undertaken by NRW under regulation 63 of the Habitats Regulations.
53. NRW’s Habitats Regulations Assessment (HRA) concludes, “In light of the conclusions of an AA [Appropriate Assessment], and taking account of the advice received from protected sites advisors, it has been established that the project will not adversely affect the integrity of any Natura 2000/Ramsar site, taking into account any conditions or restrictions as applicable, either alone or in-combination with other plans and projects.”
54. The Welsh Ministers have considered the HRA produced by NRW and are satisfied there is no new information or evidence available since it was issued that may lead to a different conclusion.
55. The assessment undertaken by NRW covers the offshore area, consented by the marine licence. The landward works of the proposed development fall outside the marine licence area. These onshore works must also be considered against the requirements of the Habitats Regulations for the purposes of the application for a section 36 consent.
56. The Welsh Ministers have undertaken a HRA for the onshore works which considers whether the proposed development is likely to have a significant effect on a European site, as defined in the Habitats Regulations, either alone or in combination with other projects. During the screening stage, the Welsh Ministers identified three European sites for which significant effects could not be excluded; the Pembrokeshire Marine SAC/Sir Benfro Forol SAC, the Limestone Coast of South West Wales/ Arfordir Calchfaen de Orllewin Cymru SAC and the Pembrokeshire Bat Sites and Bosherton Lakes/Safleoedd Ystlum Sir Benfro a Llynnoedd Bosherton SAC. An appropriate assessment was undertaken to assess the likely significant effects of the proposed development on the conservation objectives of these sites.
57. The Appropriate Assessment concludes it is beyond reasonable scientific doubt that the onshore works associated with the project, either alone or in combination with other projects, would not have an adverse effect on the integrity of the two European sites. This conclusion is based on the circumstances of this case and subject to securing the mitigation measures through the imposition of and compliance with the recommended planning conditions attached to the deemed planning permission. The onshore HRA is available on the planning casework portal: [Planning Casework](#).

Well-being of Future Generations

58. The Welsh Ministers must, in accordance with the Well-being of Future Generations (Wales) Act 2015 ("WFG Act"), carry out sustainable development. This includes taking all reasonable steps to meet their well-being objectives.
59. Section 8(2) of the WFG Act means the Welsh Ministers' well-being objectives expire as a result of Senedd elections. I have therefore not considered the extent to which granting consent under the Electricity Act and deemed planning permission meets the Welsh Government's well-being objectives as these have yet to be set in accordance with section 8(2). However, in reaching my decision on the application, I have taken into account the ways of working set out in section 5(2) of the WFG Act and 'SPSF1: Core Guidance, Shared Purpose: Shared Future – Statutory Guidance on the WFG Act'.

Looking to the long-term

60. The decision takes account of the long-term objective and commitment of Wales's target to generate 70% of consumed electricity by renewable means by 2030 to combat the climate emergency.

Taking an integrated approach

61. The decision has taken account of the interaction between the need to increase renewable energy production to combat the climate emergency and conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park.

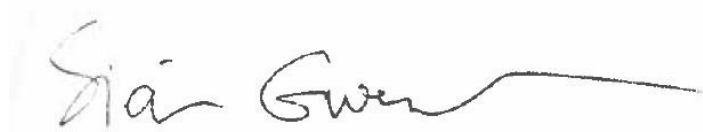
Involving people / Collaborating with others

62. Within the framework of a statutory decision-making process, which is governed by prescribed procedures, the application was subject to publicity and consultation, providing the opportunity for public and stakeholder engagement. Representations received through these procedures have been considered and taken into account in making a determination on this application.

Prevention

63. The decision takes account of the need to prevent any adverse impacts on the National Park, both in terms of landscape and seascape, as well as ecology.

Yours sincerely



Siân Gwenllïan AS/MS

Gweinidog Cabinet dros Lywodraeth Leol, Tai a Chynllunio
Cabinet Minister for Local Government, Housing and Planning

ANNEX 1 – DECISION

ELECTRICITY ACT 1989

TOWN AND COUNTRY PLANNING ACT 1990

1. In pursuance of section 36 of the Electricity Act 1989, the Welsh Ministers hereby consent to the construction and operation of a floating offshore wind development by Llŷr Floating Wind Ltd with a gross electrical output capacity of up to 100 megawatts (MW), as shown on the Annex 2 plan titled “Figure 1.1 Site Location”.
2. The development is a floating offshore wind farm, with a gross electrical output of up to 100MW, comprising:
 - a) Up to 10 wind turbines with a generating capacity of up to 100MW;
 - b) Floating offshore wind platforms and associated moorings;
 - c) Offshore inter-array cables and up to one subsea connection point per floating offshore wind array;
 - d) Up to two offshore export cables connecting offshore infrastructure to the Pembrokeshire coastline;
 - e) One transition joint bay / riser at landfall to connect the offshore and onshore cables;
 - f) An onshore substation;
 - g) Onshore cabling and associated infrastructure between landfall and grid connection at a substation; and
 - h) Other associated infrastructure, including navigational buoys.
3. This consent is granted subject to the following conditions:
 - 1) The development shall be constructed and operated in accordance with the details contained in paragraph 2 of this consent.
 - 2) The commencement of development must be a date no later than 5 years from the date consent is granted, or such other date from the date of the granting of this consent as the Welsh Ministers may hereafter direct in writing.
 - 3) Where Llŷr Floating Wind Ltd has been given notice requiring them to submit to the appropriate authority a Decommissioning Programme (“DP”) pursuant to section 105(2) of the Energy Act 2004, then construction may not begin on the site of the Development until after Llŷr Floating Wind Ltd has submitted to the appropriate authority a DP in compliance with that notice.
4. The Welsh Ministers in exercise of the powers conferred by section 90 (2) of the Town and Country Planning Act 1990 hereby direct that planning permission for the Development be granted subject to the following conditions:
 - 1) The development shall begin no later than five years from the date of this decision.

Reason: In accordance with the provisions of Section 91 of the Town and Country Planning Act 1990.

- 2) The development shall be carried out in accordance with the following plan:

Figure 4.2 – Proposed project Onshore Development Area

Reason: To ensure that the development is carried out in accordance with the approved plans and drawings submitted with the application.

- 3) Notwithstanding the details approved under condition 2, no works shall take place in the areas shown to be excluded on drawing Llyr – Installation/Operational Exclusion Areas P10-LYR-4.3.4-MAP-0020 – Rev 1.

Reason: To safeguard historical assets in accordance with Policy 14 of the PCNPA LDP.

- 4) No development shall take place until a Construction Traffic Management Plan (CTMP) has been submitted to and approved in writing by the local planning authority responsible for that part of the proposed development under its jurisdiction. All construction work, including off-site mitigation, shall be undertaken in accordance with the approved CTMP.

Reason: In the interests of highway safety in accordance with Policy 60 of the PCNPA LDP and Policy GN.1 of the PCC LDP.

- 5) No development shall take place until a Construction Environment Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority responsible for that part of the proposed development under its jurisdiction. The CEMP shall include measures to safeguard others. All works shall be undertaken in accordance with the approved CEMP.

Reason: To safeguard biodiversity and the living conditions of nearby residents in accordance with Policies 11,12 & 30 of the PCNPA LDP and Policies GN.1 & GN.37 of the PCC LDP.

- 6) No development shall take place until a scheme for improvements at Wallaston Cross for the first 900m from the realigned junction to the Welsh Water Reservoir have been submitted to and approved in writing by Pembrokeshire County Council. All works shall be undertaken in accordance with the approved scheme.

Reason: In the interests of highway safety in accordance with Policy GN.1 of the PCC LDP.

- 7) No development shall take place until details of landfall, including the works to install the cable, and temporary compound have been submitted to and agreed in writing by Pembrokeshire Coast National Park Authority. Development shall be carried out in accordance with the approved details.

Reason: To safeguard the character and appearance of the area in accordance with Policies 8 & 14 of the PCNP LDP.

- 8) No development shall take place until a Soil Management Plan (SMP) has been submitted to and approved in writing by the local planning authority responsible for that part of the proposed development under its jurisdiction. All works shall be carried out in accordance with the approved SMP.

Reason: To safeguard biodiversity in accordance with Policy 30 of the PCNPA LDP and Policy GN.37 of the PCC LDP.

- 9) No development shall take place until a Species Protection Plan (SPP) has been submitted to and approved in writing by the local planning authority responsible for that part of the proposed development under its jurisdiction. All works shall be carried out in accordance with the approved SPP.

Reason: To safeguard biodiversity in accordance with Policy 30 of the PCNPA LDP and Policy GN.37 of the PCC LDP.

- 10) No development or site clearance shall take place until a landscaping scheme including details of trees and hedgerows to be retained and their means of protection, has been submitted to and approved in writing by the local planning authority responsible for that part of the proposed development under its jurisdiction. All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons following the first operation of the substation or the completion of the development, whichever is the sooner; and any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species.

Reason: To safeguard the character and appearance of the area in accordance with Policies 8 & 14 of the PCNP LDP and Policy GN.1 of the PCC LDP.

- 11) No development or site clearance shall take place until a Landscape Ecological Management Plan (LEMP) has been submitted to and approved in writing by the local planning authority responsible for that part of the proposed development under its jurisdiction. All works shall be carried out in accordance with the approved LEMP.

Reason: To safeguard biodiversity in accordance with Policies 11 & 12 of the PCNPA LDP and Policy GN.37 of the PCC LDP.

- 12) No development shall take place until plans and elevations of the substation and details of the associated infrastructure, fencing, CCTV and lighting have been submitted to and approved in writing by Pembrokeshire County Council. Development shall be carried out in accordance with the approved details.

Reason: To safeguard the character and appearance of the area in accordance with Policy GN.1 of the PCC LDP.

- 13) No development shall take place until details of any above ground infrastructure other than the substation have been submitted to and approved in writing by the

local planning authority responsible for that part of the proposed development under its jurisdiction. Development shall be carried out in accordance with the approved details.

Reason: To safeguard the character and appearance of the area in accordance with Policies 8 & 14 of the PCNP LDP and Policy GN.1 of the PCC LDP.

- 14) No development or site clearance shall take place until the local planning authority responsible for that part of the proposed development under its jurisdiction has been informed in writing of the name of a professionally qualified archaeologist who is to be present during the undertaking of any excavations in the development area so that a watching brief can be conducted. No work shall commence until the local planning authority has confirmed in writing that the proposed archaeologist is suitable. A copy of the watching brief report shall be submitted to the local planning authority within two months of the archaeological fieldwork being completed.

Reason: To safeguard archaeological remains in accordance with Policy 14 of the PCNPA LDP and Policy GN.38 of the PCC LDP.

- 15) No development shall take place until a scheme of noise and light mitigation to safeguard the living conditions of nearby residents and protect ecological interests through the operation of the substation has been submitted to and agreed in writing by Pembrokeshire County Council. The operation of the substation shall be carried out in accordance with the approved scheme.

Reason: To safeguard the living conditions of nearby residents in accordance with Policies 11 & 12 of the PCNPA LDP and Policies GN.1 of the PCC LDP.

- 16) Within 6 months of the development hereby permitted not being used for the supply of electricity a de-commissioning and restoration scheme shall be submitted to and approved in writing by the local planning authority responsible for that part of the proposed development under its jurisdiction. Decommissioning and restoration shall be completed in accordance with the approved scheme.

Reason: To safeguard the character and appearance of the area in accordance with Policies 8 & 14 of the PCNP LDP and Policy GN.1 of the PCC LDP.

Notification of initiation of development and display of notice

You must comply with your duties in section 71ZB (notification of initiation of development and display of notice: Wales) of the Town and Country Planning Act 1990. The duties include the following:

Notice of initiation of development

Before beginning any development to which this planning permission relates, notice must be given to the relevant local planning authority in the form set out in Schedule 5A to the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 or in a form substantially to the like effect. The form sets out the details which must be given to the local planning authority to comply with this duty.

Display of notice

The person carrying out development to which this planning permission relates must display at or near the place where the development is being carried out, at all times when it is being carried out, a notice of this planning permission in the form set out in Schedule 5B to the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 or in a form substantially to the like effect. The form sets out the details the person carrying out development must display to comply with this duty.

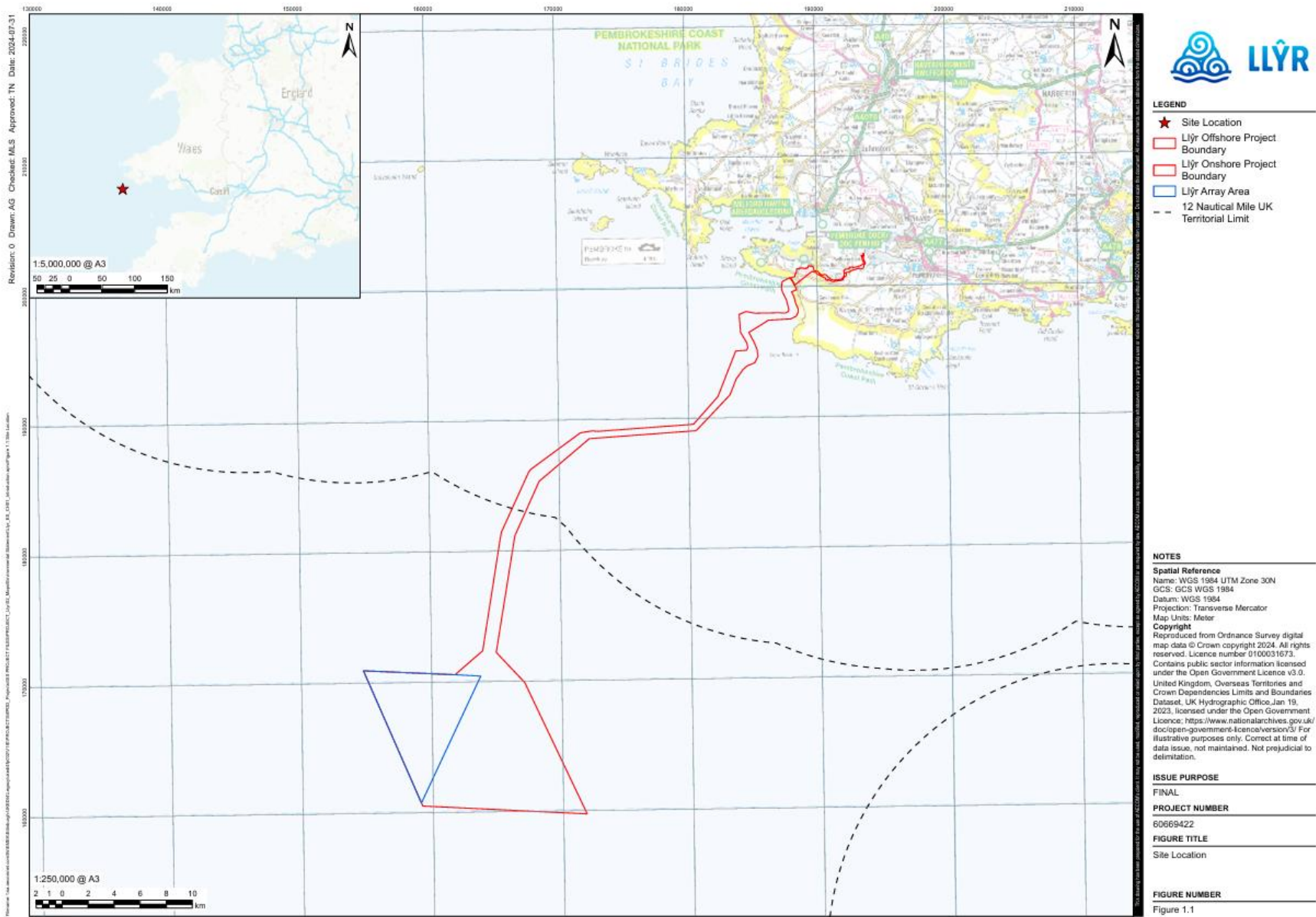
The person carrying out development must ensure the notice is:

- a) firmly affixed and displayed in a prominent place at or near the place where the development is being carried out;
- b) legible and easily visible to the public without having to enter the site; and
- c) printed on durable material. The person carrying out development should take reasonable steps to protect the notice (against it being removed, obscured or defaced) and, if need be, replace it.

Challenging the decision

The validity of the Welsh Ministers' decision may be challenged by making an application to the High Court for leave to seek a judicial review. Parties seeking further information as to how to proceed, including the relevant time limits for making an application, should seek independent legal advice from a solicitor or legal adviser, or alternatively may contact the Administrative Court at Cardiff Civil Justice Centre, 2 Park Street, Cardiff CF10 1ET.

ATODIAD 2 - Lleoliad y Prosiect / ANNEX 2 – Project Location





Penderfyniadau
Cynllunio ac
Amgylchedd **Cymru**
Planning &
Environment
Decisions **Wales**

Report

by Mr A Thickett BA (Hons) BTP Dip RSA
MRTPI

an Inspector appointed by the Welsh
Ministers

Date: 22.05.2026

Electricity Act 1989 – Section 36

Town and Country Planning Act 1990 - Section 90

Application by: Llŷr Floating Wind Ltd

Application: To construct and operate an offshore generation station in the Celtic Sea and associated onshore infrastructure.

Location: Approximately 35 km offshore south west from the Angle Peninsula on the Pembrokeshire coast.

The application is made under Section 36 of the Electricity Act 1989 and deemed planning permission sought under Section 90 of the Town and Country Planning Act 1990

The application was made on 22 November 2024.

Site visit made: 15 & 16 May 2026

Reference: CAS-01352-L3N2P8

Recommendation: That the deemed planning application be refused.

Procedural Matters

1. The proposed development includes works onshore and offshore. In addition to the application made under Section 36 of the Electricity Act 1989, the applicant seeks a Marine Licence under part 4 of the Marine and Coastal Access Act 2009. That application is being processed by National Resources Wales (NRW). Unless offshore elements have an impact on land use planning matters, this report does not comment on or make any recommendations on matters covered by the Marine Licence.
2. Under Regulation 39 (11) of the Electricity Works (Environmental Impact Assessment) (England and Wales) Regulations 2017, NRW is the Licensing Authority in respect of applications for a Marine Licence. On 12 September 2019, Welsh Ministers, under regulation 39 of the 2017 regulations, deferred the assessment of any significant effect on the environment under the Marine Works (Environmental Impact Assessment) Regulations 2007 to NRW. As a consequence, paragraphs (3) to (10) of Regulation 39 apply to the determination of the Section 36 application and the application cannot be determined until NRW has concluded the marine works assessment.
3. Welsh Ministers are the competent authority with regards to applications under Section 36 of the Electricity Act. NRW is the competent authority in respect of applications for a Marine Licence in the Welsh inshore area and the Welsh offshore area. Regulation 67 of the Conservation of Habitats and Species Regulations 2017 (Habitats Regulations) provides for co-ordination in cases when an appropriate assessment is required and where more than one competent authority is involved. By letter dated 10 December 2020, Welsh Ministers confirmed that implications for works seaward of the mean high watermark affecting European Sites should be assessed by NRW. Further, Welsh Ministers, under Regulation 67(2), stated their intention to adopt any assessment undertaken by NRW under Regulation 63 of the Habitats Regulations. This is another reason the Section 36 application cannot be determined until NRW has concluded the marine works assessment.
4. The Applicant published notice of the application in local and national newspapers on 27 and 28 November and 2 December 2024. The consultation period ended on 28 March 2025. Following consideration of the responses, submission of additional information was sought from the applicant. That information was received in December 2025. At the applicant's request, PEDW delayed consultation to run concurrently with NRW's consultation on additional information it sought. PEDW's consultation on the additional information ran from 11 February to 19 March 2026.
5. I am satisfied all legislative and procedural requirements have been met.

The Project

6. The following is a brief outline of the project. A detailed description can be found in chapter 4 of the Environmental Statement (ES).
7. The applicants propose to site up to 10 floating wind turbines in an area of about 45km², roughly 35km southwest of the Angle peninsula. To tip of blade, the proposed turbines would be 300m high. The turbines would be on floating platforms which may be circular, rectangular, or triangular depending on the technology selected. The platforms would be moored to the seabed. The two offshore export cables would be laid in separate trenches.
8. Landfall is proposed at Freshwater Beach West on the Angle Peninsula. Horizontal Directional Drilling (HDD) starting below the mean low water mark would be used to run

the offshore cables undersea and underground to connect with the onshore cables. These cables would run underground across the peninsula to a substation at Wallaston Cross. The substation building would be a maximum of 95m by 63m and 15m high. From there, a cable would run underground to Pembroke Power Station.

9. The operational life of the proposed development would be 30 years. Decommissioning would involve the removal of the wind turbines, platforms and some cables. Buried cabling would be left in place.
10. The aim of the project is to demonstrate the feasibility of floating wind technology and readiness for deployment at a larger commercial scale, not only within Wales and the UK, but internationally. Also, to act as a pathfinder project to aid the establishment and development of UK offshore floating wind industrial capability in the Celtic Sea.

Legislation

Environment Act 1995

11. Onshore the proposed development includes land within Pembrokeshire Coast National Park. Section 61 of the Environment Act 1995 sets out the statutory purposes of National Parks as;
 - a) conserving and enhancing the natural beauty, wildlife and cultural heritage of the national park and,
 - b) promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public.
12. Section 62(2) states that in exercising or performing any functions in relation to, or so as to affect, land in a National Park, regard should be given to the purposes specified above. Where there is conflict, greater weight shall be attached to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the National Park.

Policy

The Development Plan

13. Within the National Park the development plan includes Future Wales and the Pembrokeshire Coast National Park Authority Local Development Plan, end date 2031, adopted 2020 (LDP). Outside the National Park, the development plan includes Future Wales and the Pembrokeshire County Council Local Development Plan, up to 2021, adopted 2013.
14. Pembrokeshire County Council submitted its Local Development Plan 2, 2017 – 2033 for examination in October 2025.

Future Wales (FW)

15. FW recognises the potential for wind, marine and solar energy generation in the South West Region and sets out the Government's ambition for energy generation to play a role in supporting the South West economy. Policy 17 requires decision makers to give significant weight to the need to meet Wales' international commitments and the Government's target to generate 70% of consumed electricity by renewable means by 2030. The policy presumes against large scale wind developments in National Parks but, as development in the National Park is limited to a buried cable, I do not consider the presumption applies in this case.
16. Policy 18 relates to Developments of National Significance and whilst not directly relevant, is permissive of low carbon energy projects subject to Policy 17 and there being

no unacceptable adverse impacts on, amongst other things, landscape, ecology and heritage assets. The reasoned justification to Policy 18 states that onshore development aspects of offshore schemes are supported, including cable landfall infrastructure. New strategic grid infrastructure for the transmission and distribution of energy should be designed to minimise visual impact on nearby communities. Policy 9 requires the maintenance and enhancement of biodiversity to be demonstrated as part of development proposals.

Pembrokeshire Coast National Park Authority LDP

17. Policy 8 seeks to conserve and enhance the special qualities of the Park by, amongst other things, retaining its sense of remoteness and tranquillity, protecting the landscape and avoiding development on the undeveloped coast. Policies 10 and 11 safeguard protected species and habitats. Development that would harm the qualities and special landscape and seascape character of the National Park would not comply with Policy 14.
18. Policy 33 is permissive of onshore connections that would not have an unacceptable adverse effect on the visual amenities, landscape character or nature conservation of the developed and undeveloped coast. Proposals for landfall and connectors in the undeveloped coast must demonstrate why the location is necessary and that the least obtrusive approach is proposed.

Pembrokeshire County Council LDP

19. Policy SP 1 requires development proposals to demonstrate how positive economic, social and environmental impacts will be achieved and adverse impacts minimised. Developments which enable the supply of renewable energy through environmentally acceptable solutions will be supported (Policy GN.4). Policies GN.1 and GN.2 are standard development management policies which seek to secure good design and safeguard against the harmful impacts of development, including on the National Park. Biodiversity and the historic environment are protected by Policies GN.37 and GN.38.
20. Policy SP 1 of the emerging LDP requires development to support the delivery of economic, social, environmental and cultural well-being and sustainable development. Developments which enable the supply of renewable energy through environmentally acceptable solutions are supported by Policy GN 4. Policies GN.1 and GN.2 carry forward the requirements of the policies of the same name in the adopted LDP. Biodiversity and the historic environment are protected by Policies GN 28, 41, 42, 43 and 44. The emerging plan is subject to examination and its policies carry limited weight in this case.

National Policy

Planning Policy Wales (PPW)

21. States that low carbon electricity must become the main source of energy in Wales (5.7.1) and the planning system should secure an appropriate mix of energy provision, which maximises benefits to our economy and communities whilst minimising potential environmental and social impacts (5.7.6). PPW sets a target of 70% of electricity consumption from renewable energy by 2030 (5.7.14). In determining applications for renewable energy, decision makers should take into account the contribution a proposal will make to meeting targets (5.9.19).
22. In National Parks great weight should be given to the statutory purposes of conserving and enhancing their natural beauty, wildlife and cultural heritage (6.3.6). Turning to biodiversity, the step-wise approach looks first to avoid damage before minimising and then mitigating the effect of development (6.4.15). Best and most versatile agricultural

land should only be developed if there is an overriding need for the development and no lower grade or either previously developed is available (3.5.9).

Wales National Marine Plan

23. Wind energy generation is supported by Policy ELC_01 provided it complies with the relevant general policies and sector safeguarding policies of the plan. Policies GEN_01 and GEN_02 support sustainable development within the marine area. Economic growth is supported by Policy ECON_1 provided, amongst other things, it contributes to the sustainable management of natural resources and provides employment opportunities for coastal communities.
24. Policy SOC_6 states that proposals should avoid adverse impacts on designated landscapes (National Parks) and minimise or mitigate where adverse impacts can't be avoided. Similarly, Policy SOC_7 seeks to avoid harm to seascapes. At 35km from the coast, the turbines would be located outside the South Pembrokeshire Open Waters Marine Character Area as defined by the Marine Plan. Policy ENV_01 requires proposals to avoid, or if they cannot avoid, minimise or mitigate adverse impacts on marine ecosystems.

Guidance

Seascape and visual sensitivity to offshore wind farms in Wales: Strategic assessment and guidance.

25. This guidance, produced by NRW in 3 stages, advises on seascape and visual sensitivity to offshore wind farms. Stage 1 includes a ready reckoner of visual effects related to turbine size. At 300m high and around 35km from the coast, the proposed turbines would lie between the distances judged to have an average low and average medium magnitude of visual effect. The authors urge caution in applying these assessments as they say, amongst other things, taking an average of low and medium magnitude of effects means the worst case is not taken and there is potential for significant effects at these distances. Further, medium magnitude buffers are an indication of a likelihood of significant effects on a high sensitivity receptor.
26. Stage 2 sets out guidance on siting offshore windfarms and includes a checklist for minimising seascape and visual effects. These include, amongst other things, asking whether the wind turbines would be beyond the low magnitude buffer distance for the height to blade tip, e.g. beyond 44km for turbines 301-350m high. And, whether the proposal is in a zone which has a low enough sensitivity to accommodate the height of turbines and extent of development.
27. Stage 3 considers seascape and visual sensitivity by sea area. The proposed wind farm lies in Zone 14, south west of the Pembrokeshire peninsula in the Celtic Sea. This zone is described as an area of open, remote and wild sea which forms part of the western outlook beyond the islands for the Pembrokeshire coast. The coastline, albeit at some distance away, is exposed, rocky and indented, with cliffs, headlands, beaches, bays, coves and islands.
28. Susceptibility to change lies in its remote and unspoilt character. The zone forms a distant seaward setting for views from the coast. The coast has a generally undeveloped rural character, remoteness and tranquillity. The area's value lies in its relationship to and overlooking by the National Park. However, the level of impact from development in this area zone would be moderated by the substantial distance from coastal receptors.
29. The report concludes by stating the zone has potential to accommodate all scales of offshore wind farm if designed in a coherent manner. However, it recommends

minimising the height of turbines on the eastern fringes of the area in order to limit effects on highly sensitive receptors.

Representations

30. Eighteen representations were received to the first consultation. There were 7 responses to the further information. The following summaries reflect the latest position of the bodies which commented on the further information.

NRW

Seascape and Landscape

31. Large scale wind turbines would inevitably attract attention in an otherwise empty horizon and within a seascape which is integral to the value and enjoyment of the UK's only coastal National Park. Even seen at a distance, introducing any tall structure onto an empty horizon naturally draws the eye, and this attraction is increased by the rotation of turbine blades. The proposed array would result in significant effects on both visual receptors within the National Park and scenic and perceptual characteristics of the Park and its related special qualities.

32. The development would:

- Disrupt an unspoilt sea horizon and erode the existing sense of escape and space to breathe, derived from being in a landscape where the prevailing character is of an undeveloped, wild coast,
- Be visible within views of the open sea and offshore islands, changing the existing context from one in which there is limited, if any, signs of man, to one in which there is an obvious human influence,
- Erode the tranquillity associated with the seascape by adding disturbance and an obvious sign of development,
- Reduce the availability of remote undeveloped seascapes by introducing development on the horizon, eroding the sense of wild, highly natural character including at locations which are specifically highlighted for these qualities such as the Castlemartin Peninsula.

33. It is not only the sense of tranquillity that would be impacted. The array would detract from the National Park's coastal splendour by, amongst other things, interfering and detracting from the scenic quality of views towards coastal features and islands, such as the view towards Skokholm Island from the Coast Path. Impacts on the sense of tranquillity, remoteness, and wildness would also be exacerbated by the onshore works.

34. Together with the Erebus Array the proposal would result in cumulative effects on scenic and perceptual characteristics and qualities of the National Park. The proposed array would affect the same special qualities of the National Park as the Erebus array and would exacerbate these impacts. In combination, the onshore construction works would temporarily impact on views and the experience of special qualities, particularly the sense of tranquillity, in a location which is highlighted for its wild, highly natural character. Cumulative impacts would also occur in combination with Erebus, by extending the area of works, and the duration over which works would be seen to occur.

35. The impact of the proposed substation could be mitigated through a Landscape and Environmental Management Plan (LEMP).

36. The proposal would result in significant harm to the National Park. The only options for reducing or avoiding this harm are the siting of the turbines further offshore and/or reductions in size. Should the deemed planning application be permitted it should be

subject to the Llŷr Floating Wind Project Landscape Enhancement Scheme Principles, agreed with the National Park Authority being implemented with the addition of woodland planting.

37. Further, opportunities to enhance the designated landscape in accordance with Policy SOC-06 of the Marine Plan should be secured. Nonetheless, whilst the proposed enhancement scheme funding of £250,000 is welcomed, given the long term duration over which significant adverse effects would occur, the proposed fund is unlikely to be sufficient to enable any meaningful landscape enhancements.

Ornithology

38. Significant adverse effects can be ruled out for all species for the project alone and all species except great black-backed gull for cumulative impacts. For great black-backed gull and puffin a clarification note containing revised project alone collision predictions for the revised Worst Case Scenario (WCS) turbine parameters should be provided as a condition of any licence. This information should include the project alone Collision Risk Modelling (CRM) predictions for the WCS for each species.
39. Significant adverse effects can be ruled out from both the project alone and in-combination for all features of all relevant Welsh Special Protection Areas (SPA).

Joint Nature Conservation Committee (JNCC)

40. The JNCC's remit is the offshore area, beyond 12 nautical miles. Alone, the proposed development would not have an adverse impact on the Skomer, Skokholm and the Seas off Pembrokeshire Special Protection Areas (SPA). Accept the proposal would not have an adverse impact on marine ornithology bar the common guillemot. However, there is insufficient information to assess cumulative impact on the SPAs or marine ornithology.
41. Have concerns regarding the assessment of Special Areas of Conservation (SAC) designated for harbour porpoise. Do not agree with the decision to scope out certain impact pathways for both the project alone and in-combination assessment. Particularly, effects from mooring lines and cables and auditory injury and disturbance from unexploded ordnance on marine mammals. Further, the assessment of adverse effect due to noise disturbance within the sites has not been assessed correctly.

Pembrokeshire County Council

Landscape

42. The proposed substation would be of substantial scale. It would be visually divorced from the Greenlink (constructed) and Erebus (permitted) substations and other permitted developments and appear as an isolated and alien feature. The proposal would conflict with LDP Policies GN.1 and GN.2 but it is accepted such effects need to be considered as part of the planning balance when assessing positive effects in terms of the delivery of renewable energy and the principle policy support for such development.

Cable route

43. The applicant, Erebus and future developers of wind farms in the Celtic Sea should be encouraged to work together to reduce impact and disruption.

Heritage

44. The effect on the setting of Sommerton Farmhouse (Grade II listed) is a concern and, without final design details, difficult to assess.

Ecology

45. The proposed mitigation is welcomed and, provided works accord with these measures, significant impacts on protected species is unlikely. Lighting at the proposed substation may cause disturbance to badger, bat and dormouse. However, provided sufficient screening is in place there is unlikely to be a significant impact. An external lighting plan should be agreed.
46. The cumulative effects of hedgerow removal would lead to fragmentation of dormouse habitat which would have an adverse impact. It may be possible to combine some of the vegetation clearance if cable routes are shared. If this is not possible, to prevent large areas of suitable dormouse habitat being removed, it is important mitigation associated with the permitted schemes is in place before further removal of habitat.
47. The Green Infrastructure Statement addresses net benefit for biodiversity. When finalising details for hedgerow planting for dormouse and bats, the enhancement schemes for Greenlink substation and Erebus, should be considered to increase habitat connectivity and decrease landscape fragmentation.

Highways

48. The proposed development can be completed without material harm to the highway network, subject to the provision of a Travel Plan and safety/capacity improvements for the first 900m from the realigned junction to the Welsh Water Reservoir to accommodate additional traffic for the Freshwater West element of the scheme.

Pembrokeshire Coast National Park Authority

Landscape and seascape

49. Have agreed a landscape enhancement scheme with the applicant and acknowledge the reduction in the height of the turbines. However, consider the adverse effects on the National Park seascape, landscape and special qualities cannot be mitigated, and these should be balanced in determining the application against its benefits. This adverse impact would be exacerbated by other consented and proposed schemes for offshore wind farms in the Celtic Sea.

Ecology - onshore

50. Provided works are carried out in accordance with the proposed mitigation there is unlikely to be any significant impact upon protected species.

Ornithology – offshore

51. Pembrokeshire is home to over half the world's population of Manx shearwaters. Along with Kittiwake, their status as qualifying features of the Skomer, Skokholm and the Seas off Pembrokeshire SPA must be considered and appropriately addressed.

Archaeology

52. Further information is required to assess the impact of the proposed development on onshore and offshore historic assets.

RSPB

53. Object due to potential damaging impacts on gannets, guillemots and Manx shearwaters.

Heneb Development Management – Dyfed Region

54. Satisfied the impacts on the historic environment are appropriately addressed. Archaeological evaluation should be undertaken pre construction and ideally before a decision is made.

Ministry of Defence

55. No objection subject to measures to avoid detrimental impact on the operation and capability of air traffic control radar and the applicant accepting liability for any damage resulting from laying the offshore export cable through the Castlemartin Danger Area.

Cadw

56. The proposed development would have a direct impact on 5 scheduled monuments. These historic assets are considered to be of high value and the impact is assessed as major adverse. The information required to assess impact on these nationally important historic assets has not been provided. This information should be provided before the application is determined.

Welsh Government – Soil Policy & Agricultural Land Use Planning Unit

57. Require Agricultural Land Classification (ALC) surveys to confirm the extent of best and most versatile (BMV) agricultural land affected, the proportion of grades identified and the soil resources available.

Welsh Government – Transport

58. No objection subject to conditions including structural assessments and condition surveys.

Angle Community Council

59. Are concerned regarding:

- the visual impact of the proposed development on the National Park,
- the cumulative visual impacts together with other projects on the National Park,
- impact on agriculture,
- ecology,
- failure to co-ordinate provision of infrastructure with other projects with landfall on the peninsula.

National Trust

60. Owns and manages a number of the viewpoints identified in the Landscape and Visual Impact Assessment (LVIA). The prevailing character of these areas are views with an unspoilt sea horizon providing a sense of escape and a space to breathe for visitors to Pembrokeshire. The prevailing character is a largely tranquil, undeveloped, wild coast. A coastal horizon that has not changed since the neolithic.
61. Support the principle of the proposed development subject to landscape mitigation/enhancement and measures to safeguard the environment and archaeological interests.

Mid and West Wales Fire and Rescue Service, Health and Safety Executive

62. No objection.

Celas Steel, Celtico, Pembrokeshire College, Port of Milford Haven, Net Zero Industry Wales, Marine Energy Wales

63. Support the proposed development. Floating offshore wind will play a critical role in achieving net zero targets and enhancing energy security. The scheme together with other floating offshore wind test and demonstrator projects is of substantial significance to the future of manufacturing and skills development in this sector in the region and Wales. It would benefit the local economy, including presenting an opportunity to modernise port infrastructure, attract investment and establish Pembrokeshire as a centre for offshore renewable energy.

Assessment

64. The main issues with regard to the S36 deemed planning application are the impact of the proposed development on:
- the seascape viewed from the National Park
 - the landscape of the Angle Peninsula
 - ecology

Seascape

65. The applicant chose 15 daytime and 3 night time vantagepoints from Skomer Island (VP01) in the west to Caldey Island in the east (VP14). VP15 is from Lundy Island in the Bristol Channel. I visited all bar 6 of the vantagepoints. I did not visit the islands (VP01, VP02, VP14, VP15) nor take the Pembroke to Rosslare Ferry (VP03). Access to Elegug Stacks was prohibited due to live firing at Castlemartin Range. The night vantagepoints N1, 2 & 3) included photographs taken at dusk where the turbines would be visible.
66. Visibility was poor at Martin's Haven (N1) and Marloes Beacon (VP04) due to heavy rain and low cloud but conditions improved and I am satisfied I was able to assess the impact of the proposed development from other views. I have no reason to believe the applicant's photomontages are not an accurate representation of what may be seen.
67. As well as visiting the vantage points accessible by car, I walked stretches of the coast path to Hoopers Point, Lindsway Bay and St Govan's Head. I also walked Marloes Sands and Freshwater West Beach. From Martin's Haven (N1) to Manorbier (VP13) views of the Celtic Sea are currently free of man-made structures such as turbines or rigs. Walking along the coast path, the wide, open and unspoilt seascapes are a significant contributor to the sense of remoteness and tranquillity Policy 8 of the NPA's LDP seeks to conserve. The applicant's photomontages show the turbines would be seen from every vantagepoint. Other than stretches within Milford Haven the turbines would be visible from the majority of the Wales Coastal Path from Martin's Haven to Manorbier Beach and likely beyond.
68. The extent to which the turbines protrude above the horizon would depend on distance, and elevation. However, the photomontages show in addition to the blades, the upper sections of the towers would be visible in all cases. Views from St Anne's Head (VP06), Lindsway Bay (VP07) and Castles Bay (VP08) are influenced by shipping in and out of Milford Haven and the Valero refinery and its tall stacks.
69. Nonetheless, on clear days the towers and moving blades would be visible from a long stretch of this protected coast. The moving blades would draw the eye to the turbines exacerbating their adverse visual impact on the seascape and on the sense of tranquillity walking the coast path. If one considers remoteness to include there being nothing in view to spoil the feeling that you are alone and far from the modern world, views of the turbines would have a significant adverse impact on the sense of remoteness currently experienced on parts of the coast. As I heard, Castlemartin is anything but tranquil on firing days but sea views are unspoilt.

70. For those parts of the coast where the Valero refinery is not visible, other than ships passing by in the night, the sea and night sky is dark. In these areas, the lights of the turbines would constitute a significant intrusion into the dark skies of the Celtic Sea and further detract from the National Park's sense of tranquillity and remoteness.
71. I conclude that the proposed development would have a significant detrimental impact on the seascape viewed from the Pembrokeshire Coast. The proposal would conflict with Policy 17 of FW, Policies 8 and 14 of the Pembrokeshire Coast National Park Authority LDP and Policies SOC_6 and SOC_7 of the Marine Plan.
72. Turning to cumulative impact, of the proposed floating wind farms included in the ES, only Erebus and White Cross have been consented. Erebus is not constructed but the turbines would be smaller, 270m. Although closer to the coast, the wireframes and photomontages show the Erebus turbines would not be as visible as the 300m structures proposed in this case. White Cross is off the North Devon coast, it would be 18km from the proposed wind farm making it around 53km from the Pembrokeshire Coast. The wireframes and photomontages show only the tips of the blades would be visible. Nevertheless, the three windfarms would be visible from the coast and together occupy a wide arc of view from the coast with a significant adverse cumulative impact on the seascape.
73. If consented the Valorous wind farm (a possible Nationally Significant Infrastructure Project [NSIP]) would fill the gap between Erebus and the proposed development. According to the ES, Llŷr 2 is at pre application stage, views would overlap those of White Cross but the Llŷr 2 turbines would be closer. It is not clear these projects will come forward, or in their current form and I give them no weight in my assessment of cumulative impact. Nonetheless, the cumulative impact of the built and consented wind farms would exacerbate the harm identified above in conflict with local and national policy.
74. The applicant and the National Park Authority have agreed a Landscape Enhancement Scheme with a fund of £250,000 to be secured through a Section 106 Agreement. According to the Community Infrastructure Levy Regulations 2010, to be lawful, planning obligations should be necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development. These tests are echoed in Circular 13/97 Planning Obligations, which also requires obligations to be relevant to planning and reasonable in all other respects.
75. The proposed development would have an adverse visual impact when seen from the National Park coastline and it is difficult to see how the impacts on those views could be mitigated without blocking views of the sea. To do so would, to my mind, have a greater adverse impact on the enjoyment of the views from the coast than the turbines. I cannot see how landscape enhancements elsewhere in the Park could be said to be necessary to make the development acceptable or be directly related to the proposed wind turbines. At time of writing the Section 106 Agreement had not been submitted and I am not aware of its terms. Nonetheless, the proposed planning obligation would not be lawful if it does not comply with the regulations and should be given no weight in the determination of the deemed planning application.

Landscape

76. The offshore cable would join the onshore cable above the beach at Freshwater West. This would be achieved by horizontal directional drilling (HDD) and, therefore, not seen at all. The alternative would be digging a trench but any impacts relating to trenching or construction compounds would be temporary with sites restored to their previous condition.

77. The substation would be in open countryside in the heart of the Angle peninsula at Wallaston Cross. The substation site lies in the Rhoscrowther Historic Landscape Character Area, the main characteristic of which is the agricultural land use and landscape. There is a solar farm to the south west and looking from the south one can see Pembroke Power Station. Nevertheless, the landscape here remains largely rural with a patchwork of irregular shaped fields, dotted with houses and farm buildings.
78. Two options are proposed for the substation. The first would see some equipment housed in a building the maximum parameters of which would be 15m height, 95m long and 63m wide. The equipment linking to the grid would be on the northern side of the building. Other equipment would be located to the south of the building.
79. In Option 2, all the equipment would be exposed. Under both options the compound would be enclosed by a 2.4m steel panelised security fence and include a control building. The plans show this would be 10m high although according to the ES it could be 15m high.
80. The compound would be surrounded by new landscape screening but this would not be sufficient to hide a large industrial shed, suited to a business park but not open countryside. Together with the control building and electrical machinery, the proposed development would be significantly at odds with this rural setting. I conclude, therefore, the proposed development would have an adverse impact on the character and appearance of the area and historic landscape and conflicts with Policy 17 of FW and Policies GEN.1 and GEN.2 of the Pembrokeshire County Council LDP.

Ecology

81. Skomer and Skokholm islands are famed for their bird populations, their internationally recognised status is a significant feature of the National Park and the impact of the proposed development on offshore ornithology is a material consideration. NRW, the RSPB and the JNCC raised a number of concerns with regard to the methodology used to assess the impact of the proposed wind turbines on bird populations. In response the applicant provided additional information.
82. The RSPB has not responded to the additional information. However, NRW is now largely content and accepts any impacts would not be significant in EIA terms. I consider as expert advisors to Welsh Government and custodians of the natural environment in Wales, NRW's position should be given significant weight. Further, Ministers and I are entitled to assume NRW would not recommend the issue of a Marine Licence were it not satisfied there would not be an unacceptable impact on protected species, including imposing conditions on a Licence to ensure this.
83. Moving onshore, the proposed landfall would be adjacent to Broomhill Burrows SSSI. However, through HDD no direct ecological impacts on habitats and plant species are anticipated. The application is supported by surveys for bats, dormice, otters, water vole, badger, breeding birds and wintering birds. Subject to conditions, NRW is satisfied the proposed development would not have an adverse impact on ecological interests. The mitigation and enhancement measures proposed in the Green Infrastructure Statement (GIS), including impacts on hedgerows would be provided through the landscaping scheme and other measures.
84. Subject to the requirement of a Construction Environment Management Plan (CEMP) and Landscape Ecological Management Plan (LEMP), I conclude the proposed development would not have an unacceptable impact on ecological interests and that it complies with Policies 9 and 17 of FW, Policy GN.37 of the Pembrokeshire County Council LDP, Policies 10 and 11 of the Pembrokeshire Coast National Park Authority LDP and Policy ENV_01 of the Marine Plan.

Other matters

Agricultural Land

85. Where trenches are needed to lay the onshore cable the impact would be minor in terms of area, temporary and controlled by the Soil Management Plan. On that basis I saw no need to require further surveys.

Strategy

86. A co-ordinated approach to the provision of the proposed cable routes through the peninsula would be sensible but bringing the different parties and interests together is outside the remit of this application.

Transport

87. The wind turbines would be floated into position from where they are constructed and the construction of the substation is unlikely to involve materials and equipment being transported by abnormal loads. On that basis, I do not consider structural assessment or conditions surveys of the A477 as sought by Welsh Government Transport Division are necessary. The Highway Authority have no objection subject to road improvements and the provision of a Construction Traffic Management Plan. This would ensure any disruption is limited and impacts would be temporary in any event.

Historic Assets

88. As a result of concerns raised by Cadw and I, the development area has been revised to exclude ancient monuments at Freshwater West. As a result, impact on archaeological remains is not considered to be significant and any assets would be safeguarded through the imposition of a condition.
89. Somerton Farmhouse lies around 1 mile to the south east of the site of the substation. Given the distance, intervening screening and the existing views of the power station in the vicinity of the Farmhouse, I do not consider the proposed development would have an adverse impact on the setting of the listed building.

Living conditions

90. Other than a cottage within a few metres of the proposed substation no residential properties would be affected by the proposed development. The living conditions of the occupiers of the cottage during construction and operation could be safeguarded through conditions regarding noise and working hours.

Conditions

91. I have considered the conditions suggested by Pembrokeshire County Council in light of the advice in Circular 16/14: The Use of Planning Conditions in Development Management. In the event Welsh Ministers decide to approve the application, I consider the conditions set out in Appendix 1 are necessary and would satisfy the tests in the Circular.
92. Conditions requiring a CEMP, LEMP, Species Protection Plan and landscaping will protect species and habitats and provide enhancement. I consider the requirements of these conditions to be sufficient and the appointment of an Ecological Clerk of Works to be unnecessary.
93. The landfall is to an unspoilt beach, the cable route passes through agricultural land and the substation site is a field. Nothing is submitted to show that any of the land has been in any other use and likely to be contaminated. A condition with regard to contamination is, therefore, unnecessary.

Conclusions

94. Neither RSPB nor the JNCC commented on the additional information but NRW are now content adequate mitigation can be put in place. I see no reason to question that stance and it is reasonable and proper to assume NRW would not recommend the issue of a Marine Licence were it not satisfied there would be no unacceptable impact on protected species or habitats. The JNCC's concerns regarding harbour porpoise are a matter for NRW and the marine licence. This is neutral in the planning balance.
95. Subject to conditions there should be no harm to terrestrial ecological interests. No adverse impacts on highway safety or living conditions are anticipated but again, the recommended conditions should ensure this. This is neutral in the planning balance.
96. FW Policy 17 requires decision makers to give significant weight to the need to meet Wales' international commitments and the Government's target to generate 70% of consumed electricity by renewable means by 2030. It is anticipated the proposed wind farm would generate enough renewable electricity to power around 100,000 homes. The proposed development would contribute to meeting national targets for generation of electricity by renewable energy and achieving Wales' ambitions for net zero carbon.
97. In addition, should as it is hoped, the project demonstrates the effectiveness of floating offshore wind, it would pave the way for the production of more, clean energy to meet these targets. Around 2,000 jobs would be created during construction and new jobs associated with the operation of the substation. There will be training opportunities and jobs created in the supply chain. These matters weigh in favour of the proposal.
98. There will be days when the weather conditions limit visibility to the extent turbines would not be visible from the coast. Nonetheless, on clear days, whilst they would occupy only a part of overall views, the turbines would inevitably have an adverse impact on the seascape viewed from the coast and the sense of remoteness and wildness experienced on the coast path. On clear nights the lights on the turbines would have a similar impact. I do not see how this impact could be mitigated. Further, the proposed substation would have an adverse impact on the character and appearance of the area.
99. The Pembrokeshire Coast National Park is the only coastal National Park in Wales and the UK. The proposed development would have a significant adverse impact on the National Park in direct conflict with its statutory purposes.

Recommendation

100. This adverse impact outweighs the benefits referred to above and having taken account all matters raised, I recommend the application be refused and deemed planning permission not be granted. In reaching this recommendation, I have taken into account the requirements of sections 3 and 5 of the Well-Being of Future Generations (Wales) Act 2015. This recommendation is in accordance with the Act's sustainable development principle through its contribution towards the Welsh Ministers' well-being objectives.
101. Should Ministers disagree, the deemed planning permission should be subject to the conditions in Appendix A.

A Thickett

Inspector

Appendix A: Schedule of Recommended Planning Conditions

- 1) The development shall begin no later than five years from the date of this decision.
Reason: In accordance with the provisions of Section 91 of the Town and Country Planning Act 1990.
- 2) The development shall be carried out in accordance with the following plan:
Figure 4.2 – Proposed project Onshore Development Area
Reason: To ensure that the development is carried out in accordance with the approved plans and drawings submitted with the application.
- 3) Notwithstanding the details approved under condition 2, no works shall take place in the areas shown to be excluded on drawing Llyr – Installation/Operational Exclusion Areas P10-LYR-4.3.4-MAP-0020 – Rev 1.
Reason: To safeguard historical assets in accordance with Policy 14 of the PCNPA LDP.
- 4) No development shall take place until a Construction Traffic Management Plan (CTMP) has been submitted to and approved in writing by the local planning authority responsible for that part of the proposed development under its jurisdiction. All construction work, including off-site mitigation, shall be undertaken in accordance with the approved CTMP.
Reason: In the interests of highway safety in accordance with Policy 60 of the PCNPA LDP and Policy GN.1 of the PCC LDP.
- 5) No development shall take place until a Construction Environment Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority responsible for that part of the proposed development under its jurisdiction. All works shall be undertaken in accordance with the approved CEMP.
Reason: To safeguard biodiversity and the living conditions of nearby residents in accordance with Policies 11,12 & 30 of the PCNPA LDP and Policies GN.1 & GN.37 of the PCC LDP.
- 6) No development shall take place until a scheme for improvements at Wallaston Cross for the first 900m from the realigned junction to the Welsh Water Reservoir have been submitted to and approved in writing by Pembrokeshire County Council. All works shall be undertaken in accordance with the approved scheme.
Reason: In the interests of highway safety in accordance with Policy GN.1 of the PCC LDP.
- 7) No development shall take place until details of landfall, including the works to install the cable, and temporary compound have been submitted to and agreed in writing by Pembrokeshire Coast National Park Authority. Development shall be carried out in accordance with the approved details.
Reason: To safeguard the character and appearance of the area in accordance with Policies 8 & 14 of the PCNP LDP.
- 8) No development shall take place until a Soil Management Plan (SMP) has been submitted to and approved in writing by the local planning authority responsible for that part of the proposed development under its jurisdiction. All works shall be carried out in accordance with the approved SMP.
Reason: To safeguard biodiversity in accordance with Policy 30 of the PCNPA LDP and Policy GN.37 of the PCC LDP.
- 9) No development shall take place until a Species Protection Plan (SPP) has been submitted to and approved in writing by the local planning authority responsible for that

part of the proposed development under its jurisdiction. All works shall be carried out in accordance with the approved SPP.

Reason: To safeguard biodiversity in accordance with Policy 30 of the PCNPA LDP and Policy GN.37 of the PCC LDP.

- 10) No development or site clearance shall take place until a landscaping scheme including details of trees and hedgerows to be retained and their means of protection, has been submitted to and approved in writing by the local planning authority responsible for that part of the proposed development under its jurisdiction. All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons following the first operation of the substation or the completion of the development, whichever is the sooner; and any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species.

Reason: To safeguard the character and appearance of the area in accordance with Policies 8 & 14 of the PCNP LDP and Policy GN.1 of the PCC LDP.

- 11) No development or site clearance shall take place until a Landscape Ecological Management Plan (LEMP) has been submitted to and approved in writing by the local planning authority responsible for that part of the proposed development under its jurisdiction. All works shall be carried out in accordance with the approved LEMP.

Reason: To safeguard biodiversity in accordance with Policies 11 & 12 of the PCNPA LDP and Policy GN.37 of the PCC LDP.

- 12) No development shall take place until plans and elevations of the substation and details of the associated infrastructure, fencing, CCTV and lighting have been submitted to and approved in writing by Pembrokeshire County Council. Development shall be carried out in accordance with the approved details.

Reason: To safeguard the character and appearance of the area in accordance with Policy GN.1 of the PCC LDP.

- 13) No development shall take place until details of any above ground infrastructure other than the substation have been submitted to and approved in writing by the local planning authority responsible for that part of the proposed development under its jurisdiction. Development shall be carried out in accordance with the approved details.

Reason: To safeguard the character and appearance of the area in accordance with Policies 8 & 14 of the PCNP LDP and Policy GN.1 of the PCC LDP.

- 14) No development or site clearance shall take place until the local planning authority responsible for that part of the proposed development under its jurisdiction has been informed in writing of the name of a professionally qualified archaeologist who is to be present during the undertaking of any excavations in the development area so that a watching brief can be conducted. No work shall commence until the local planning authority has confirmed in writing that the proposed archaeologist is suitable. A copy of the watching brief report shall be submitted to the local planning authority within two months of the archaeological fieldwork being completed.

Reason: To safeguard archaeological remains in accordance with Policy 14 of the PCNPA LDP and Policy GN.38 of the PCC LDP

- 15) No development shall take place until a scheme of noise and light mitigation to safeguard the living conditions of nearby residents and protect ecological interests through the operation of the substation has been submitted to and agreed in writing by

Pembrokeshire County Council. The operation of the substation shall be carried out in accordance with the approved scheme.

Reason: To safeguard the living conditions of nearby residents in accordance with Policies 11 & 12 of the PCNPA LDP and Policies GN.1 of the PCC LDP.

- 16) Within 6 months of the development hereby permitted not being used for the supply of electricity a de-commissioning and restoration scheme shall be submitted to and approved in writing by the local planning authority responsible for that part of the proposed development under its jurisdiction. Decommissioning and restoration shall be completed in accordance with the approved scheme.

Reason: To safeguard the character and appearance of the area in accordance with Policies 8 & 14 of the PCNP LDP and Policy GN.1 of the PCC LDP.