

REPORT OF HEAD OF DEVELOPMENT MANAGEMENT ON APPEALS

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

NP/08/434	Enlargement of existing hay barn, erection of cattle shed, yard and pigsties and formation of hedgebanks and provision of slurry tanks - Llethyr, Cwm Gwaun
Type	Hearing
Current Position	The initial paperwork has been forwarded to the Inspector and a Hearing has been arranged for 17 th October, 2012.
NP/11/497	Outline application for erection of 3-bedroomed house with approval sought for access and layout - Land Adjacent to 7 Walton Hill, Little Haven, Haverfordwest.
Type	Hearing
Current Position	The initial paperwork has been forwarded to the Inspector .and a Hearing has been arranged for the 13 th November, 2012.
NP/11/531	Demolition of building, ground and first floor flats, & replacing with two houses - Ground and First Floor Flats, 6, Panteg Road, Solva,
Type	Written Representation
Current Position	The initial paperwork has been forwarded to the Inspector.
NP/12/0075	Removal of occupancy condition on TB1707- Zion Gardens, St Johns Hill, Tenby
Type	Written Representation
Current Position	The appeal has been withdrawn. .
NP/12/0134	Change of use to residential - Natural Healthcare Centre, 17 Long Street, Newport
Type	Written Representations
Current Position	Awaiting Inspectors decision.
NP/12/0209	Agricultural workshop/store associated with the Long Barn units & smallholding(retrospective) – Garden/Paddock area of The Long Barns, Lochvane
Type	Written Representations
Current Position	The initial paperwork has been forwarded to the Inspector.
EC06/137	Siting of two shipping containers - Blaenafon, Mill Lane, Newport
Type	Written Representation
Current Position	Awaiting Inspectors Decision.

Other Matters

PROPOSED APPLICATION FOR DEVELOPMENT CONSENT TO CONSTRUCT AND OPERATE THE ATLANTIC ARRAY OFFSHORE WIND FARM - CONSULTATION RESPONSE UNDER SECTION 42 OF THE PLANNING ACT 2008.

Purpose of Report

A formal pre-application consultation under Section 42 of the Planning Act 2008 was submitted in relation to the above proposal on 4th July 2012. The purpose of this report is to inform members of the response given for information only.

Background

As reported to members last month, RWE intend to submit an application to the Planning Inspectorate in due course for an offshore wind farm to the south of Pembrokeshire and north of Devon in the Atlantic Ocean. As part of the process Section 42 of the Planning Act 2008 relates to carrying out a pre-application consultation with local authorities and this formal consultation is the subject of this report. The consultation related to a proposal for a range of turbines of between 188 and 278 in number with a maximum capacity of 1500 MW. The height of the turbines would have a maximum hub height of 125m above sea level, and a maximum tip height of 220m above sea level. All onshore works would be provided in North Devon with no associated development planned within the National Park, or within Pembrokeshire. The application area is indicated on the attached plan and the background papers can be found through the link below.

As reported last month professional landscape consultants were commissioned to assist in providing an independent assessment of the project's effects on the landscape, seascape and visual resources of the area, as well as the effects on the settings of historic landscapes and monuments.

Main Comments

The response to the Section 42 consultation can be found at Appendix A of this report. The response highlights the main policies to be considered and draws attention to the need for the proposal to be considered with regard to the National Park's purposes whether the proposal is within or outside the National Park designated area. Three main issues were raised; visual impacts, biodiversity matters and tourism and recreation matters.

In respect of the visual impacts, it was considered that the impacts had been understated and the proposal is likely to have significant effects on key viewpoints within the National Park as well as sequential impacts on views from the Coast Path. It is considered that these impacts would be contrary to national and local policy in respect of the consideration of national energy projects.

With regard to biodiversity, it was considered that further information was required in relation to the possible impacts of the proposal on habitats and species that are features of the biodiversity of the National Park and in this respect it was premature to comment on these issues.

In relation to the last issue, it was considered that the proposal would impact on the tourism industry for the National Park and the economy of the area due to the decreased enjoyment of the Coast Path that would arise from the sequential impact of the Array from critical viewpoints and in terms of the impact to the undeveloped, wild character of the National Park that draws tourists to the area. As such the proposal would not meet the second purpose of the National Park Authority nor its duty to foster the economic well being of the National Park communities.

Recommendation

That members note the response to the Section 42 consultation.

Background Papers

<http://www.rwe.com/web/cms/en/1524102/rwe-innogy/sites/wind-offshore/developing-sites/atlantic-array-offshore-wind-farm/consultation-documents>

Atlantic Array Offshore Wind Farm – Review of Draft Environmental Statement, Land Use Consultants, August 2012.

For further information please contact Vicki Hirst, Head of Development Management)

Ref: DC/Consultations/Atlantic Array/VH
Your Ref: LP/drp/JCD1038

30th August 2012

Atlantic Array Offshore Wind Farm
Channel Energy Limited
c/o RWE npower Renewables Limited
Auckland House
Lydiard Fields
Great Western Way
Swindon SN5 8ZT

Dear Sir/Madam

Re: Proposed Application for Development Consent to construct and operate Atlantic Array Offshore Wind Farm under the Planning Act (the 2008 Act)

The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (the APFP Regulations)

The Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (the EIA Regulations)

1.0 Introduction

1.1 I refer to your formal pre-application consultation under Section 42 of the 2008 Act in relation to the Atlantic Array Offshore Wind Farm. This letter comprises the Pembrokeshire Coast National Park Authority's (PCNPA) response to this consultation.

1.1 The response sets out the PCNPA legislative and policy context for considering this proposal and highlights the key issues that arise from this consideration. Each issue is discussed with regard to the draft Environmental Statement (ES) and with supplementary information attached to these considerations where necessary. The response then provides a conclusion.

2.0 Legislation and Policy

2.1 The Pembrokeshire Coast National Park was designated as a National Park in 1952 under the National Parks and Access to the Countryside Act 1949 and covers 243 square miles of cliffs, beaches, estuaries and rugged hills. It is host to the 186 mile long National Trail; the Pembrokeshire Coast Path (also now part of the all Wales Coast Path). There are 13 Special Areas of Conservation (SAC) designated under the EU Habitats Directive that are wholly or partially within the National Park boundaries including 3 Marine SACs, together with 4 Special Protection Areas (SPA) designated under the EU Conservation of Wild Birds Directive 1979. Within the National Park boundaries there are also several National Nature Reserves and numerous Sites of Special Scientific Interest designated for their habitats, species, geology and biodiversity. It is the only National Park that has

been designated primarily for its coastal landscapes and was voted as the second best coastal destination in the world in 2011.¹ It is therefore one of Britain's most important landscapes and seascapes.

- 2.2 As set out in the draft ES there are a number of international and national legislative requirements to be considered in assessing this proposal, together with both nationally and locally adopted planning policy. For the purposes of this response it is not intended to repeat the range of legislative requirements and policies but to draw attention to those with a particular relevance to the PCNPA in its Welsh context.
- 2.3 The Environment Act 1995 gives National Parks the highest possible designation in landscape terms together with Areas of Outstanding Natural Beauty and sets out the purposes of the National Park Authorities in England and Wales as being:
- a) *The conservation or enhancement of the natural beauty, wildlife and cultural heritage of the Park and:*
 - b) *The promotion of the public understanding and enjoyment of those qualities*
- 2.4 The National Park Authorities also have a duty to:
- Pay regard to the need to foster the economic and social well-being of the local communities within the Park provided this is compatible with the two Purposes.*
- 2.5 Where there is conflict between the two Purposes the first principle will prevail.
- 2.6 In dealing with development proposals the Planning Acts require decisions to be made with regard to the development plan unless other material considerations indicate otherwise. The Development Plan has had regard to national planning policies but does not repeat these as the Plan should be considered in conjunction with national policy. In the Welsh context Planning Policy Wales Edition 4 comprises the overarching national planning policy framework, together with the suite of Technical Advice Notes that accompany it. As this proposal is for a major energy proposal consideration of the National Policy Statements in relation to renewable energy is required. In this instance NPS EN-1 "Overarching National Policy Statement for Energy" and NPS EN-3 "Renewable Energy Infrastructure" are particularly relevant.
- 2.7 In the context of the above national policy framework attention is drawn to the need to consider the proposal with regard to the National Park's purposes whether the proposal is within or outside the designated area. This is highlighted in paragraph 5.9.12 of EN-1. This requirement is extremely pertinent in this case and should be of high importance in assessing this proposal.
- 2.8 The PCNPA adopted its Local Development Plan (LDP) in September 2010 and this provides a number of detailed policies in relation to protection of the National Park and in respect of renewable energy proposals. These policies reiterate the need for development, including large scale renewable energy projects to be compatible with the National Park's purposes, and to protect and enhance the special qualities and landscape of the National Park. The relevant policies are attached at Appendix A.

The special qualities of the Park referred to in Policy 8 followed survey work regarding this issue to inform the LDP and the National Park Management Plan. A copy of this survey is attached at Appendix B.

- 2.9 It is noted that whilst some reference to Welsh and local planning policy is mentioned, the draft ES focuses primarily on the English context for planning policy (see ES, Volume 1, Chapter 2, Para 2.36 and Volume 1, Chapter 3, Para 3.16). The Welsh context should also be included in full in the ES with local, up to date planning policy clearly highlighted.
- 2.10 With regard to the above context there are three main issues arising from this proposal for the PCNPA. These are the visual impact of the proposal on the PCNP, the impacts on biodiversity and the effect on tourism/recreation.

3.0 Visual Impacts

- 3.1 The visual impact of the Atlantic Array is clearly a key issue for the PCNPA in commenting on this proposal. As such, PCNPA commissioned an independent firm of consultants - Land Use Consultants to provide an independent review of the draft Environmental Statement (ES), with specific reference to the landscape, seascape and visual resources of the area.
- 3.2 The work included the preparation of an independent Zone of Theoretical Visibility (ZTV) of the Atlantic Array proposal, a review of the methodology and impacts on seascape, landscape and visual resources as contained in chapter 12 and annexes of the ES (Part 1) and a summary review of impacts on terrestrial heritage assets and historic seascape character. The full report is attached at Appendix C.
- 3.3 Whilst the report found that the ES study area combined with the Zone of Theoretical Visibility is appropriate for an offshore scheme of this scale, it considered that the impacts had been understated. In view of the legislative and policy context above, and the highest status of a National Park designation in landscape terms, it would have been expected that all viewpoints in the study would have achieved a "Very High Sensitivity" status rather than the "High Sensitivity" that is the main category. It is unclear why the majority fall into the "High" category in this context. In view of this lesser grading, it is considered that some of the impacts result in being understated and an unrealistic assessment of the visual impact is concluded.
- 3.4 The ES also fails to take into account the PCNPA's Landscape Character Assessment but rather relies on the more generic landscape character areas set out in LANDMAP. This is considered to be a highly regrettable omission as the study does not fully take into account local character and the special qualities of the National Park within its baseline study. In the absence of a full consideration of these special qualities in the baseline study, the impacts shown are not with full regard to the local characteristics. In particular the more indirect effects such as perceptual and experiential character of the coastline are omitted, with issues such as the wild, remote character of the clifftops and beaches being left out.
- 3.5 It is considered that there will be major visual impacts at key views, in particular from Caldey Island and St Govan's Head and sequentially along the Coast Path.

As set out above, the Coast Path is one of the most significant attributes in the National Park and is largely visited for its wild, remote cliff top character with largely uninterrupted seascape views. The introduction of the Atlantic Array which will be visible from significant lengths of the Coast Path will be an alien concept, detrimental to the natural beauty and character of this unique, and only coastal National Park, and the significance of this is considered to be understated in the ES. Whilst it is accepted that National Policy Statement EN-1 states that the fact that a proposal will be visible from within a designated area should not in itself be a reason for refusing consent, the impact of the proposal will be on the overall intrinsic character, perception and experience of the National Park's special qualities and not just on its visual appearance. As such it is not considered that the proposal would comply with the requirements of either national or local policy.

4.0 Biodiversity

4.1 In view of the fact that all of the landward implications for nature conservation/biodiversity are on the North Devon coast or concern the marine environment in the Bristol Channel the PCNPA would look to the government's statutory advisors (English Nature and the Countryside Council for Wales) to assess and comment on the methodologies used, the conclusions drawn from the data/information obtained during the EIA process and the implications for species and habitat conservation.

4.2 It is noted however, that the potential impacts on the coastal/inshore biodiversity of the NP have not been fully addressed and should be included in the final ES. It is also noted that the majority of the sea birds that may be affected by the proposed development nest on Grassholm, Skomer and Skokholm Islands which in addition to being of European importance are an integral part of the biodiversity of the National Park. It will be necessary to demonstrate how the proposal may or may not impact on biodiversity features of the PCNP such as those referred to above. In addition, any impacts on marine species that utilise waters adjacent to the National Park will need to be identified (eg marine mammals).

5.0 Tourism and Recreation

5.1 The Pembrokeshire Coast National Park relies heavily on its tourism and recreation for employment and economic benefit. A considerable amount of tourism is generated from the mere existence of the wild and remote nature of the National Park and the experience of walking the Coast Path with its uninterrupted seascape and views. Visitor surveys confirm that the main attraction of Pembrokeshire for visitors is the unspoilt natural beauty of its coast and countryside. Leisure walking is also recorded as being by far the dominant visitor activity. (see Pembrokeshire Visitor Survey and Appendix B). The most recent quarterly report of Pembrokeshire Visitor Survey 2011/12 confirms this trend.

5.2 As set out above the Pembrokeshire Coast Path is an attraction in itself. The National Geographic magazine also recently voted Pembrokeshire as being the second best coastal destination in the world.

5.3 The 1996/97 Coast Path User Survey recorded a total of 287,325 users over the 12 month survey period. Electronic visitor counters on the Coast Path at Monkstone

and St Govans recorded a total of 35,640 walkers between January - December 2011; a slight decrease on the previous year of 39,859 walkers between January - December 2010. In the 1996/97 Coast Path User Survey report, the natural landscape was recorded by respondents as the main attraction for walking the Coast Path. This remained the dominant attraction in the National Trails Survey 2007. The Coast Path is one of the main ways by which residents and visitors gain access to enjoy the special qualities of this predominantly coastal National Park and as such is a highly significant recreational activity within the National Park.

- 5.4 This activity is also of high economic importance. The Economic Impact of Walking in Wales 2011 report estimated that in 2009 there were 28 million walking related trips to the Welsh countryside and coast generating a direct expenditure of £632m. The 1996/97 Coast Path User Survey estimated the economic contribution of the Pembrokeshire Coast Path as ranging from £8m to £19.6m. The significance of leisure walking and the Coast Path to the local economy is clear and any proposal that could adversely affect this activity needs the utmost scrutiny.
- 5.5 It is noted that Volume 1, Chapter 17 of the ES in relation to tourism and recreation specifically excludes the visual impacts of the proposal on the enjoyment of Public Rights of Way leaving these to the visual assessment section of the ES. The primary consideration in the ES is the noise effects to the Rights of Way. The PCNPA is of the view that this is an unfortunate omission; the visual impact of the turbines is inextricably linked to the enjoyment (or not) of Rights of Way and thus the numbers of visitors who come to the National Park to enjoy these attributes. Whilst it is accepted that some generic survey information is provided (mainly from Scottish examples) it is considered that additional information is required to supplement this chapter to provide evidence of any correlation between turbine arrays and their associated impacts to people's enjoyments of rights of way. This is absolutely essential for the proper consideration of how this proposal may impact on the second purpose of the PCNPA in promoting the public enjoyment of the National Park and also in meeting its duty to promote the socio-economic well being of the National Park communities.
- 5.6 Notwithstanding the above it is considered that the sequential visual impacts referred to above will have an adverse effect on the number of visitors using the Coast Path with the associated negative impacts on the economy of the area.

6.0 Conclusions

- 6.1 In conclusion the proposal will result in three key issues to be considered by the PCNPA in commenting on an application for a Development Consent Order. These relate to the visual impact of the proposal, the possible impacts on biodiversity and considerations in relation to tourism and recreation.
- 6.2 With regard to the visual impact it is considered that the impacts have been understated and the proposal is likely to have a significant effect on key viewpoints within the National Park as well as a sequential impact on views from the Coast Path. It is considered that these impacts would be contrary to national and local policy in respect of the consideration of national energy projects and on the basis of the information to date it is likely that there would be an officer recommendation of refusal.

- 6.3 In addition, further information is required in relation to the possible impacts of the proposal on habitats and species that are features of the biodiversity of the National Park and in this respect it is premature to comment on these issues. It is also considered that the proposal is likely to impact on the tourism industry for the National Park and the economy of the area due to the decreased enjoyment of the Coast Path that would arise from the sequential impact of the Array from critical viewpoints and in terms of the impact to the undeveloped, wild character of the National Park that draws tourists to the area. As such the proposal would not meet the second purpose of National Parks and would also not fulfil the duty of the PCNPA to foster the economic well being of the National Park communities.
- 6.4 I would stress that the views expressed are given at officer level only and are without prejudice to any comments that may subsequently be made on any subsequent application for a Development Consent Order. Should any clarification be required please contact me and I will be happy to discuss further.

Yours sincerely

Vicki Hirst
Head of Development Management
1 National Geographic Magazine, 2011

APPENDIX B

Pembrokeshire Coast National Park

**Management Plan (2008-2012)
Local Development Plan
(2006-2021)**

Background Paper No *: Visitors & Residents Survey

October 2007

**PEMBROKESHIRE COAST NATIONAL PARK
AUTHORITY**

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1 Purpose

The survey was carried out in order to help us prepare for early stages of the National Park Management Plan and Local Development Plan and their associated Strategic Environmental Assessment, Sustainability Appraisal and Habitats Regulations Assessment.

Survey responses will help shape our vision for the Park - a key departure point for all management and development policies.

2 Distribution/Availability

In view of the timelines for preparation of both plans, two main routes were pursued in order to engage visitors and residents. Visitor-targeted questionnaires were distributed via the National Park Authority's visitor centres at Tenby, St Davids and Newport. A questionnaire contained in ParkLife was dropped to 60,000 addresses in and around the Park. An online survey was available on the NPA website. The questions in each case were the same.

Visitor questionnaires were available from 10th August 2006; resident questionnaires (in ParkLife) were delivered in the week commencing 6th November 2006. The closing date for replies was the 1st January 2007.

3 Responses

Incentive/facilitation - questionnaires were freepostable back to the NPA, and a prize of a hamper of local produce or £100 of book tokens was offered as a prize. All questionnaires were available bilingually. Response numbers and some breakdowns are tabulated below.

Medium	Number of respondents	Composition
Visitor survey	142	Overnight visitors – 91 Day visitors – 2 Unspecified – 30 Student – 14 Resident - 5
ParkLife	76	All assumed to be Pembrokeshire residents
Website	18	11 from Pembrokeshire, 3 from rest of Wales, 3 from rest of UK, 1 from rest of world
	Total 236	

4 Interpretation of the survey

Questionnaires invited a 'free text' approach to questions. These allow respondents a greater freedom in response than tick boxes alone. Free text can significantly reduce the risk of leading or circumscribing responses though it will undoubtedly affect, positively or negatively, take-up and completion rates.

By the nature of the survey type, respondents will be heavily self-selected. For instance, one could imagine that those who are (a.) aware of the National Park (and/or NPA) and (b) those that have a strong view about one or both of these would be more likely to pick up/respond. Of these, it might be that those who are generally more 'pro-Park' (not necessarily 'pro-NPA') are more likely to respond. Those who are less enthusiastic about the designation may also feel that their views will not be taken into account, or do not want to engage for other reasons. This is pure speculation; the reality may of course be very different.

These deficiencies, which are more or less inherent in any survey of this type, are acknowledged. Also acknowledged is the inevitable bias added by me in summarising free text.

What is particularly useful about the responses is that they often explain why certain features are special to the respondent, how that person experiences them, and what feelings they evoke. Similarly, people have often described where and when and why they perceive an issue to be an issue. Since the value in comments is as much in the one-off comments as in the recurring themes, this report is longer for that.

All the comments as submitted are annexed to this document: they are a valuable and heartfelt resource.

While a free text questionnaire makes analysis more difficult in the sense that they do not lend themselves to generating option-led and fairly predictable charts, as tick boxes do, the responses do give us a much better chance of getting under the skin of the Park's generic special qualities and the issues facing them - with which we are familiar – and into far more specific issues, proposals and sentiments. The survey was intended as an opportunity for dialogue, not as a quantitative, scoring exercise.

Some attributes of the Park naturally attract more comment than others. I have however aimed to present a full spectrum of people's views without too much 'league tabling' of special qualities, which is not feasible from this survey. Where there seemed to be an observable difference I have kept residents' and visitors' views separate. These could of course be an artefact of response rates or of something else. Some phrases I felt captured a particular mood and these are quoted verbatim or paraphrased closely.

5 Results

Q1 - What are the special qualities of the Park?

What are your favourite aspects of the Park and what makes them special to you?

SQ - Visual character and tranquillity (see also all headings below)

Respondents referred to the blend of different types of countryside/coastal scenery, the bonding of landscape and seascape and the contrasts. The quality of natural light was cited. Wildness, openness and the un-manicured appearance of the Park were all prized. Relative lack of noise and light pollution were highlighted as rare and at-risk commodities in a cluttered world.

It is clear from the responses that it is not just certain features that are valued, it is the fact that they occur together in combination, in a relatively small area, and are readily (freely) accessible.

SQ - Experiences

Special qualities were often articulated as emotions and feelings.

Visitors referred to for example wildness, remoteness, timelessness, the slow pace of life and what one respondent dubbed the 'relaxability' factor. The Park was found to be welcoming, unpretentious, and the gastronomic experience of food based on local produce was praised. Respondents appreciate the ability to enjoy the Park without crowds and many expressed the view that 'the silence has a magical quality all too rare.' One referred to the 'exhilaration of wind and waves', another stated that the 'beauty raises an emotion in me that no other place in the world can', and another respondent, who has been visiting since 1976, said that it was the only place in the world where they return. Others expressed delight at the freedom and one described as 'unforgettable' the moment when they sighted their first chough after many years of searching. Another felt here the presence of 'my family, all my roots.'

Residents echoed visitors' comments and made particular reference to solitude and the impression of limitless space. A sense of tradition, community, peace and the past were also more prominent. References were made to the 'spirituality of a beautiful landscape steeped in a rich cultural past', spiritual calm and inner peace, of being at one with nature, to the Park as a place for children to experience through exploration and learning. Freedom from too many rules is valued - as is the knowledge that Park designation and other safeguards are in place. One respondent liked 'That I have a right to be there'; another enjoyed the fact that there is a surprise around every corner of the Park. Others added that the special qualities they had listed could vary with mood or weather.

SQ - Biodiversity

Visitors and residents made mention of the proximity to wildlife and its abundance. The chance of seeing wildlife when in the Park was valued, and the changes through out the year. Particular habitat types (and often specific sites) were mentioned; for example moorland, commons and heathland, estuaries, foreshore, rivers, hedges, woods, dunes and the islands. Specific mention was made of coastal flowers and fauna including seabirds, seals and porpoises.

SQ - Geodiversity

This was scarcely mentioned, at least explicitly, by residents (and by relatively few visitors), but reference was made to the spectacular appearance and diversity of coastal scenery and rock formations – and of course scenery was a prominent theme (see visual character).

SQ - Community aspects – see also built environment

Residents appreciate the small vibrant settlements, and their living, working nature. Particular mention was made of small farms and the feeling of cultural heritage. One recorded their pleasure at not being accessible by motorway. Sympathetic development control was appreciated, for example keeping housing development within villages and reasonably faithful to the vernacular style.

Visitors appreciated the lack of commercialisation, the small scale and relative peacefulness of settlements (for example St David's and Newport) and their friendly nature. The variety of attractions and individual shops selling local produce was welcomed, as was the perception that tourism has not spoiled their character and attractiveness.

Students drew attention to community spirit and the Park's communities' care for the Park area and its special qualities.

SQ - Air and water quality

Residents and visitors alike enjoy fresh air and clean, clear water.

SQ - Built environment – see also Community and Historic environment

Residents recognised planning's role in preserving the unique landscape and heritage. A range of examples of building are treasured, with one respondent illustrating the range with reference to Pentre Ifan and RNLi Tenby. Associated built features such as barns and stone walls were mentioned, with buildings being compatible with their surroundings.

Visitors commented on the range of architectural styles – a range which in itself gives a distinctive feel. Again, the lack of commercialism and small and individual shops were complimented. The link was made by many between development control and the

appearance of the built environment in retaining the rural aspect. Facilities and amenities also listed as special qualities.

SQ - Historic and archaeological environment

There are obviously strong links between the historic and archaeological environment as an aspect of the built environment, and visitors prize the ancient history, churches and spiritual places, including archaeological monuments. Residents referred to the ever-present feeling of the Park's long history of settlement, sustenance of culture and traditions, and old houses and their gardens.

SQ - Recreational opportunity and specific locations/features (see also all above)

All the special qualities above are sources of enjoyment, so this section looks more specifically at the means by which, and ease with which, they are accessed.

Residents particularly value the beaches and access to the coast and its scenery via the National Trail. They cited open land and lack of vehicles as valuable assets. Surfing is also a popular activity. Specifically mentioned sites/areas included Pengelli, Poppit Sands, the Daugleddau, the Preselis.

Along with visitors, they commented on the quiet roads and well maintained but rugged and unspoilt coastline and paths. The ease of getting round is valued, and the coastal/walkers buses were frequently praised. The information available on linear and circular walks was welcomed. People commented on the warmth with which they were received as visitors and the fact that one could easily find solitude. Specific sites, aspects and activities were mentioned: for example Caerfai, the Preselis, Monkstone, Moylegrove; the surf, the wind and the islands; sailing/boat trips and horse-riding. Unsurprisingly, many made reference to walking the coast path and inland paths, as activities in their own right and in order to access other places. Tourist information provision, through signposting, the TICs, activities and events, publications and NPA sites like Castell Henllys attracted very positive comment. Several specifically stated that they deliberately visited in the shoulder season or winter (because there are fewer people), and a number have been visiting the Park for 20-30 years.

It is pleasing, and a renewed call to arms, that a number of respondents listed as a special quality the feeling of knowing that the other (physical) special qualities that they had listed were, in principle, safeguarded into the future. That is, peace of mind in regard to the Park's future is a special quality in its own right.

Q2 What are the main issues facing the Park today and in the future? How should we as an Authority be addressing these?

Think about the threats and opportunities to the parts of the Park that are special to you, as well as the bigger picture for the Park as a whole)

(a) In safeguarding the natural beauty, wildlife and cultural heritage, the issues are....

These comments were submitted in answer to the question on environmental issues but many are obviously applicable to other sections (and to more than one sub-section of this section). In particular they may have relevance to responses on Recreation and Socio-economic issues.

Where there seemed to be strong differences I have again distinguished between visitors' and residents' responses, and have roughly categorised them. Some respondents described themselves as 'Student' – i.e. perhaps a temporary resident – and I have also distinguished their responses where appropriate.

As a general comment, people are obviously alert to a range of issues, and it is interesting to note that relatively few responses to this question were exclusively about environment in the narrow (i.e. physical environment) sense of the word. Links were made, explicitly or implicitly, between biodiversity, landscape and cultural heritage and current practice – a recognition of the landscape as manifestation of the rural economy, and also as a cultural record.

1st purpose issues - Global/general

- climate change and its possible effects on land use, erosion, flooding and buildings
- doing all we can to encourage sustainable energy sources, specifically wind and solar
- sustainable land management and monitoring of change
- reconciling community needs with conservation
- large scale developments in tourist infrastructure- Bluestone, fast roads, high-rise buildings, mobile homes and static caravans
- increasing development pressures if farmers sell land which is unable to make them a living
- loss of the means to manage habitats if farmers withdraw from the land
- aftercare of industrial sites on the Haven
- continued availability of finance and knowledge to manage the area
- dog fouling and control, and littering were highlighted as was the countryside code in general

1st purpose issues - Wildlife

Residents listed:

- Management of people's impact on wildlife and the environment
- Species loss and changes in species related to climate change
- Changing agricultural practices, and the need to encourage appropriate management of marginal land and plagioclimax vegetation (for ecological and landscape reasons). Also of concern was withdrawal of active land management generally; one respondent felt strongly that the main threat to the landscape stems from a 'transformation of the local farming community from one of skilled, cheerful, productive families to uncaring contractors prompted to action only by subsidising or penalty'. The link between land management and farm incomes was highlighted.
- A lack of information provision on wildlife at parking sites

Students listed:

- Climate change and its effects (whether warmer or colder) on the biodiversity of protected areas
- The apparent overgrown nature of land, which is considered wasteful

Visitors were alert to:

- coastal protection
- conservation of habitats and species
- allowing people to see wildlife and making information available but minimising disturbance
- the plight of fish and shellfish stocks

1st purpose issues - Culture and community/local economy/planning

For visitors a recurring theme was that of second home/holiday home ownership and its effects on house availability and prices, young out migration and accompanying dilution/loss of cultural heritage. Visitors also favoured continued promotion of the Welsh language, for example by giving visitors a Welsh lesson. They were also live to:

- Regulation of caravan parks
- The disbenefits of mass tourism
- Lack of control of erection of agricultural buildings
- Insufficient emphasis on build quality
- Town/village encroachment onto surrounding areas or creation of new villages
- Bluestone setting a precedent
- Growth in watersports with overcrowding of marinas/quays
- overburden of water/sewerage systems during the summer
- conservation of small communities like Porthgain, Solva and Trefin

- large scale wind turbines/farms
- military use of coastal areas
- ad hoc development by individuals, often without planning permission
- ugly street furniture, lighting and signage
- indiscreet tourist aspects, e.g. 'undifferentiated, highly repetitious trinket shops'
- tourist and residential coastal development
- the need to rescue of derelict properties

Residents expressed concern about:

- holiday home ownership and development of Park villages into holiday home centres
- ad hoc breaches of the Park boundary (Bluestone), which was felt to be a retrograde decision and superfluous given existing accommodation by small providers
- oil refinery safety
- LNG safety
- excavation of graves in Angle
- Tetra masts
- vandalism
- Dereliction of buildings of historic interest, including lime kilns and gun emplacements
- Creeping commercialisation and attractions not complementary to the Park's intrinsic natural and cultural qualities. One suggestion was to agree with Pembrokeshire County Council a buffer zone around the Park with restrictive planning policies to protect the integrity of the Park itself, particularly where the Park is narrow

Residents also mentioned:

- Poor public transport
- Roadworks, drainage and quality of workmanship
- Overdevelopment and second home ownership (e.g. Saundersfoot)
- Too much house building, particularly ribbon development – effects on cultural heritage and quality of life
- Traffic volumes
- The desirability avoiding large holiday centres/static caravan parks and instead promoting small hotels/B and Bs and small camp/tourer sites
- A need for planning control to encourage sensitive building and support first time buyers
- The imminent loss of industrial history from living memory

- Underemployment, low incomes, and people's inability to work in their communities
- urbanization, unsuitable housing and kitsch home improvements (i.e. brick driveways, pebble dash) diminishing architecture
- transformation of the Park into a theme park
- encouragement of small industries that are not blots on the landscape
- too great an emphasis on preservation, since Bluestone would allow more people to enjoy the Park
- the increasing size and intensiveness of farms
- high building densities, affecting quality of life
- the visual appearance of development at Trewent Park
- Students also saw a need for housing which is both sustainable and affordable. They also saw:
- a need to develop renewable energy
- a lack of jobs for young local people – only poorly paid service industry jobs
- a lack of further education facilities

Other respondents noted the issues of:

- 'dealing with the huge changes assaulting what has always been an engaging backwater' including 'maintaining authenticity when tourism is the biggest earner'
- Coping with having the second biggest port in the UK
- A precedent having been set by the Bluestone permission

1st purpose issues - Tourism, recreation and education (see also Q 2 (b.) below)

Visitors were aware of potential pressures created by them, and the need to keep numbers below saturation point. This could be done, and benefits spread more widely, by for example regulation of development and tourism, and promotion of areas away from the Trail, e.g. Preselis and Gwaun. Visitors also suggested:

- Promotion of buses, via booking agencies for holiday lets, before people arrive
- Education of visitors through more family events and guided walks
- Clear signage and footpaths to keep disturbance of wildlife to a minimum
- ensuring up to date information, notice boards at key sites - while complimenting the TICs
- Continued maintenance of footpaths and bridleways as 'the Park itself educates all who tread there and touches all hearts and souls'
- Management of access and recreation on habitats e.g. sand dunes

Visitors warned against:

- commercialisation/Disneyland- or Cost Brava-isation of the Park
- Increasing numbers of boat numbers around Ramsey
- Lack of pull-offs and picnic sites for motorists
- Disturbance of wildlife and people by dogs
- Noise, pollution and danger from powered craft on the Cleddau rivers/Haven
- Numbers of 4x4s especially a problem on narrow lanes with no footpaths
- Recreation and access leading to dune erosion
- the pitfalls of overuse, while noting a desirability of encouraging more people to enjoy the Park

Many residents saw similar issues, for example the danger of the Park becoming a theme park and a need to manage visitor numbers. Others though feel that development should be sympathetic to tourism's needs. Amongst the proposals were:

- Education about the Park in schools through activity days, trails etc linked to the curriculum; education of visitors and locals alike
- Promotion of the Park to those sympathetic to its attributes and purpose; some people see the Park solely as a recreational resource
- dune management, while retaining dune access at Freshwater East
- Development of facilities to meet modern economic/tourist/local needs in an ethical, environmentally sensitive way that preserves the beauty, tranquillity and sense of adventure its very seclusion offers
- promotion of the rivers as ways to enjoy the Park
- Among the problems listed were:
 - the numbers of camping sites and the prospect of more
 - a greater pressure for accommodation close to the Trail
 - the impacts of unmanaged off-road vehicles and mountain bikes, particularly on the Preselis
 - footpath condition on popular stretches of the Trail and near parking places/entry zones to the Trail

1st purpose issues - Visual and tranquillity

Residents and visitors had concerns in this area - maintenance of the remoteness of many places in the Park and the threats from noise and visual intrusion, especially since this is a rarer commodity everywhere. One respondent commented that "The motorised, plugged in life-style of the majority of visitors means that quiet recreational pursuits are less likely to be protected. A handful of jet-skis and micro lights spoil the pleasure in peace and quiet for

so many others.” Street lamp glare and caravans were cited as examples of visual pollution.

1st purpose issues - Transport and access

Respondents were agreed that it was desirable to provide access for all while protecting the beauty, wildlife, environment and cultural heritage from inappropriate impacts e.g. erosion of the Trail near entry points to, and parking areas for, popular stretches, and traffic congestion at hot spots. People were vociferous in support of the coastal buses - although they also proposed greater frequency of services, and registered some dissatisfaction with other services - and urged for limits on vehicle access and car use on minor roads – by providing and promoting excellent public transport so that cars are less necessary, more use of Park and Ride and limitations on car access to the coast path.

Other suggestions included:

- Removal of car parking fees (e.g. at Newgale) so as to welcome visitors
- enhancement of features such as Solva car park, Quay road
- prohibiting vehicular access, including quad bikes, on the Preselis
- footpath condition on popular stretches of the Trail and near parking places/entry zones to the Trail
- making the Park more accessible to tourists but with a form of visitor payback for e.g. path maintenance

Concerns included the number of boat trips from St Justinian and erosion of tranquillity there, jetskis in shallow waters posing a danger to swimmers, and the speed of cars generally and size of vehicles on minor roads.

1st purpose issues - Water, air, soils, erosion, litter

Residents and visitors drew attention to pollution by fishing waste from shipping, especially at Freshwater West.

Visitors commented on:

- Water pollution and bathing water quality, and the desirability of Newport having Blue Flag status
- Erosion of footpaths and cliff edges
- The environmental impact of golf courses e.g. water use
- Residents highlighted:
- Pollution of water and beaches from launch vehicles
- Dogs on beaches, and dog fouling on footpaths and pavements
- oil spills
- Pollution from the energy developments in South Pembrokeshire, and from other industrial uses

of Milford Haven Waterway

- traffic emissions
- Littering and silage wrap in hedges, fences and rivers
- soil degeneration
- dune erosion at South Beach and a possible breach there

1st purpose issues - Finance and NPA governance

Residents made a number of comments about National Park Authority resourcing and governance, for example ensuring funding keeps pace with maintenance and improvements, being clear and steadfast about policy and commitment, resisting development pressures from tourism and industry. Many felt that the NPA has not protected the Park from these impacts. Suggestions included forming more practical partnerships, eco-audit of all Park (NPA?) buildings, promoting sustainability and leading by example e.g. by using renewable energy. Other comments were:

- that the Authority is too big for its boots and that it should let holiday makers have fun instead of worrying whether their ticket has run out or whether parking/dogs or children are allowed
- that there was a threat of not being allowed to use the local hills, on the rare occasions when there are snow falls
- That the NPA should not too have many rules and regulations
- that the NPA take a real community involvement approach to engaging with people - in the Park, outside park, visitor and second home owners

Q2 What are the main issues facing the Park today and in the future? How should we as an Authority be addressing these?

Think about the threats and opportunities to the parts of the Park that are special to you, as well as the bigger picture for the Park as a whole.

(b) In promoting opportunities for everyone's enjoyment and wider benefit of the special qualities of the Park, the issues are....

2nd purpose issues - Facilities/access

Visitor

- Retain and perhaps increase picnic areas

- improve toilet facilities and increase parking at Freshwater West
- ensure that facilities/snack bars continue to operate at "family" beaches e.g. Manorbier and allow simple attractions to attract genuine family visits etc
- military use precludes walking all the coast on the coastal path.
- Improve access in some places for less fit people
- Conflict between the push to make the Park accessible for all (i.e. wheelchair access) and keeping the remote beauty, particularly with an aging population
- Don't make it too safe and easy for young people.
- Disabled access and access for a diversity of groups e.g Porth Melgan, access to the Cathedral refectory – operate a buggy ferry from car park to Cathedral and TIC. Make more sections of path (coast) at beauty spots wheelchair accessible. Low floor coastal buses
- Think about disabled access also for people with sensory impairments and autism, learning difficulties etc.
- public transport - is good but needs to continue and increase as visitor numbers
- increase
- Providing 'entertainment' for visitors which needs to be balanced with preserving peace & quiet
- retain the present unspoilt landscape, but allow appropriate development (i.e. 'Oakwood') away from coastal regions
- keep access to the countryside free

Resident

- retain bins and keep toilets open in winter
- Open parts of the Trail to cyclists
- Sympathetically site seats to help older/less able walkers
- Maintain safety of the Trail, especially for young
- More local beaches could have cafes. Support for restaurants, cafés, shops, small businesses that provide quality venues for locals and visitors.
- Need for unusual but small scale and sympathetic features to attract more visitors e.g. more cycle trails, horse riding trails, wildlife trails
- More boardwalks/accessibility for disabled groups. Ease of access for all, especially for those with mobility limitations needs to be addressed and developed
- Closer liaison with Pembs CC for provision of watersports facilities but resisting a wholesale take-over of cliffs and shorelines
- Sensitive development of outdoor pursuits - education re environmental issues.
- increase access to military sites

- strain on parking from more visitors
- Lack of indoor/other activities for bad weather conditions
- should be fewer tent and caravan sites
- even more litter disposal units and especially dog bins. Not enough Park Wardens

2nd purpose issues - Transport pressures (see also access and transport under Q2 (a.))

Visitor

- Numerous comments praising the coastal buses, and their role in reducing traffic and traffic noise. Encouragement to promote further development of sustainable public transport, walking and cycling. More accessible/frequent service on the coast between St Davids & Fishguard. Very good links between walks for Fishguard to Newport on the coast - except Sundays. Increase the area covered by buses so that people can leave cars at home and still access remote areas.
- Low floor coastal buses
- Cost of parking should be kept low or risk excluding many
- Control car usage and speed, reduce dominance of car within centres
- increasing range of buses to cover greater area of the Park, so encouraging people to leave fuel cars at home and still able to visit the best places
- give access to disabled users to the whole of the Park especially for wheelchair users – if you cannot drive, it is very difficult to get to the National Park, and there is an assumption that everyone can drive

Resident

- More bus trips for enjoyment and sight seeing
- a renewable energy ferry between Hobbs Point and Neyland and/or Hobbs point and Milford Haven new marina.
- Run water taxis in the summer.
- Local Communities to have their own passes etc, to help prevent car jams by vehicles not parked in regulation car parks at peak times at e.g. Freshwater West, Bosherton. More car parks but not at Abercastle! Stop expecting the local people to have to pay for parking
- Improve frequency of public transport (road and rail) around the coast

2nd purpose issues - Environmental impacts

Visitor

- Reduction in the quality and quantity of wilder, remoter places of solitude
- Letting people know how to get to these places safely without disturbing wildlife and natural flora

and fauna

- Establish a balance between promoting more interest to visitors and keeping the environment as beautiful as it is without it swamping it with visitors – don't kill the golden goose
- chemicals put on the land have resulted in water pollution and depleted fishing stocks

Resident

- Promote non-polluting water activities - sailing, canoeing, rowing, swimming
- Need to balance people's expectations without spoiling the Park for future generations.
- Stop people abusing beaches with vehicles
- Damage by people/dogs to natural plant communities at "hotspot" locations – e.g. Whitesands, Bosherton, Strumble, some stretches of the Cost Path
- River use and its development
- Ensure wildlife is properly protected and farmers' stock also protected.
- Set a benchmark in sustainability and quality of environment for all life

2nd purpose issues - Community impacts

Visitor

- support Welsh language and culture
- use and promote local products- fish, veg etc, keep traditions, customs, language etc.
- Housing should only be sold to people to live in, not as holiday homes as these create ghost villages
- Encourage farming to maintain the pastoral infrastructure, keeping profitability.
- obtrusive buildings – screen ugly buildings and keep to traditional buildings and colour
- uncontaminated bathing sites

Resident

- Regulate touring cars/caravans etc and limit their numbers into the Park by prior booking only onto sites
- charge full council tax on holiday homes with c 50% going to the Park
- more Grid-linked wind power
- use guided walks and study tours to attract people off season and maybe reduce pressure in season
- Pembrokeshire cannot be all things to all people
- encourage hotels and guest houses, self-catering can bring a 'rough element' and drive law

abiding citizens away

- There is no opportunity for anyone to have a chance of buying a house or land to promote their business, as wages within the County are so low and the price of land is high. Support small businesses - many graduates move away and rural areas seem to consist mainly of older people
- Sustainable housing for local residents.
- the farmer that makes the scenery - work with the farmer. Encourage environmentally responsible farming. Ensure wildlife and farmers' stock is properly protected
- Develop sustainable tourism projects, developing public transport links. The Authority should remember that the preservation of the natural beauty and wildlife habitats should always have precedence
- control second homes which remain empty most of the year – adding nothing to the economy - schools, shops or pubs - managed holiday cottages are not the same thing.
- Follow up planning decisions, and remove caravans
- Consultation with Community (getting better)
- Round the clock security of LPG installations and oil refineries as terrorist targets
- Good coast-care, in conjunction with Keep Wales Tidy
- Create new communities with sympathetic housing, where people live/work
- re-open schools in villages

2nd purpose issues - User-user tensions

Visitor

- Dogs need to be on leads on the Trail
- Limit litter and vandalism although generally a very high standard
- How to manage conflicting interests of Park users - those who want peace and quiet and those who want a more active holiday
- Assign certain areas for adventure parks while leaving the unspoilt areas alone for the enjoyment of walkers, sailors, surfers, canoeists etc.
- Overcrowding even in shoulder seasons
- Noise from jetskis, motor boats, dogs and some adults
- Develop any new attractions in buildings that mimic original
- More dog bins and regular collection

Resident

- keep dogs under control
- encouraging all to use the Park, when really part of it's beauty is the isolation and lack of people

- Too great commercial pressure. Advertising and promoting worldwide – but in Britain alone there are 60 million people – can they all spend their summers here?

2nd purpose issues - Information/marketing/education

Visitor

- Give specific information about "traditional", untouristy, places to eat
- Guide leaflets to walks and coastal, harbours, coves and bays in a series of one day walks around the coast, published on leaflets (subdivide the 186 miles of the Pembrokeshire Coastal Path). Better/more marking/directions (way marking etc) of paths etc. Cheap maps. Signage on the coast path for distances between points/features, terrain, place names, information, and at look-out points – especially handy in the shorter days of winter if in unfamiliar territory. Some inland trails are badly signed. Better signposting from Trail.
- Replace stiles with gates
- Educate children and a wider range of people about Park issues
- Get information across to visitors quickly is essential and helps to avoid 'honey pots'. Leaflets are well-received. Onsite provision is helpful (leaflet boxes?). Website is good, but could be better known perhaps. It would have been good to have had your excellent free newspaper - really useful, in advance? Can you hook up with holiday let properties to send out copies to visitors a week or two before they come?
- It appears to be difficult to get information (e.g. from TIC's) on locations in the South from TIC's in the North, and vice-versa. TIC's ought to have information on the whole of the NP area, wherever they are. The National Park Centre at St Davids does not appear to fulfil a function which is any different from the TIC a short distance away.
- promotion - "sell" Pembrokeshire better to attract visitors – especially out of season and to those sympathetic to Park purposes. However, fewer facilities are open off season so a catch 22 exists.
- The relative remoteness of the Park to much of the UK and continental Europe is both an advantage and a disadvantage. Cornwall is harder to get to and yet much better known and more popular than this region. Learn a few lessons from Cornwall then out-compete them. Access from England – Bath has the greatest number of tourists from the US outside of London
- Education on environmental issues - the temporary ranger in Tenby is an excellent initiative
- rangers should be able to charge/fine people on the spot
- promote visitor centres in local papers
- get local people to act as a guides and show their favourite areas

Resident

-
- don't overkill on 'interpretation'. To appreciate the special qualities of the Park you need only to be there and to use your senses to provide the experience. You do not require to be bombarded with information at every turn.

- Guided walks/study visits are a good idea. These could attract people outside the County for several days out of season. Set up a group of guides able to conduct bespoke walks and treks
- vary the approach e.g. eco-sculpture events, annual photographic prize
- promote special easy access spots with interpretive items available
- Angle digs very interesting
- relative lack of detailed information on the Preseli Hills walks - little signposting and route marking (times, difficulty etc.). Put discreet information boards at more of the honeypot NPA sites. More signage – where are these special places of interest and how do you get to them? Perhaps "loosen up" on signposting to instruct the user and save on aspects of getting lost/trespass, especially on the promoted circular walks.
- Target promotions carefully toward groups who naturally respect and value the interface of wild with domestic. "The Preseli Hills have little in common with Oakwood." Promote history and marine life (e.g. Dolphin Coast) which would attract interested groups and increase local awareness - promotion of Pembs culture.
- The complete coastal walk occurs once a year - could this be increased?
- People respond to polite notices and challenge those mentioning fines for dropping litter

Student

- encourage young people to volunteer and help to conserve their own community's environment
- more youth conferences

2nd purpose issues - NPA/partners

Visitor

- Too many layers of authority result in little innovation and a curb on initiative and rules seem to be applied inconsistently
- Park Authority shouldn't try and please 'everyone' but focus on quality and its natural environment

Not given

- How to maintain consent and cooperation even when individual choices are being curtailed. A society dominated by rights will pose increasing threats to protected environments. A booming economy creates an avalanche of change - migrant workers, trophy homes, urban expectations in rural areas

Q 2 What are the main issues facing the Park today and in the future? How should we as an Authority be addressing these?

Think about the threats and opportunities to the parts of the Park that are special to you, as well as the bigger picture for the Park as a whole.

(c) In thinking about the social and economic wellbeing of our National Park communities, the issues are....

Housing

Second home ownership was a strong theme for visitors and residents, and emerged also in Q2 (b.)

Residents commented on the effect of second and holiday homes in the Park; one example given was Little Haven where it was noted that there are very few all year round locals. This makes the community is less vibrant, and would in future result in a loss of society, as well as sapping livelihoods. A proposal was to Council Tax such property at triple rates and put the revenue into local employment/housing. Also suggested was creating more housing for local needs through e.g. ex-chapels, schools etc and change of use, S106. There was a feeling that more encouragement should be given to home owners through grants and information in order for them to opt for green solutions, and that the area planning authorities should encourage sustainable housing and RE such as wind turbines, solar panels and wood burning stoves. Allotments were also suggested.

Visitors saw high house prices and empty second and holiday homes as a problem. Suggestions were to limit house purchase by non-locals for holiday lets and ring fence more housing for locals only. The cultural effect was noted when Welsh people are unable to live amongst their relatives because they are priced out. And the visitor experience suffers as a consequence, because if locals are marginalised through second home ownership it makes a place soulless. Visitors also wanted to see greener houses using local materials for local families - providing work for locals as well as accommodation, but planning restrictions on new development and holiday homes so that housing does not encroach on the countryside.

Employment

Residents saw a need for greater income generation coming from the Park's natural surroundings, but without over-development or exploitation. Local people want jobs apart from cleaning holiday homes, catering etc at minimum wages. Suggestions included promoting establishment of rural businesses - woodwork, crafts etc. using old barns, warehouses etc., based on deciduous trees replacing the softwood resource, and using other indigenous materials. The NPA should listen to local people, not the multi-million companies who it was claimed employ people from outside the area over local people, fragmenting families and communities.

Visitors echoed these themes, urging a variety of jobs for those living in the area especially given downturn in farming and threats to oil industry, which would also allow those young people who had moved away to move back. Joint initiatives to encourage inward investment in high value-added knowledge-intensive and non-polluting business entities were suggested, and employment of local people to act as guides for walkers. There was a proposal for shell fisheries based on Pembrokeshire's unpolluted seas and their potential for spotlighting the UK's competitive advantage in marine exploitation. At the same time, fishing effort should be controlled and as part of that Skomer MNR should be designated a complete no take zone. Another suggestion was further industrialisation in Milford Haven.

Transport

Transport perhaps attracted more comment in the context of Q2 (b.) and comments reflected issues raised there. For example promotion of public transport, building on the excellent bus services (especially for walkers), introducing traffic calming measures and car sharing schemes.

Visitor comments included a thumbs up that car parks were reasonably priced, but the Cleddau Bridge toll was felt to be a barrier, and a resident noted that car parking charges will exacerbate an existing problem of inappropriate and illegal parking. Traffic management Saundersfoot was raised. A resident warned that global warming may dramatically change the way we live and the ability to travel about in the manner we currently take for granted as a right.

Planning/major developments

This theme appeared to attract more comment from residents than from visitors. There was a feeling that the NPA's development committee and planners should look more broadly at planning proposals and examine individual propositions in the near and wider context of their implications, and how development would impact on near, and not so near, neighbours. Suggestions included promoting sustainable housing; more grass roots involvement with community members; better communication and consultative process for planning; more support for energy conservation and RE schemes; encouragement of small turbines and small rural workshops; permitting holiday use conversions of suitable agricultural buildings that would otherwise be lost, and ensuring buildings (especially listed) are not allowed to fall into a state of disrepair. Attention was drawn to inconsistent refurbishment aesthetics, the need to maintain the physical space around existing dwellings, pressure on farmland for development, counter-productiveness of too many restrictions and there was a suggestion that the LDP has a reduced number of policies (between 25 and 35) and that they be more specific and clearer.

Visitor comment included a suggestion that the NPA look at user donations, e.g. covenants etc. but to be cautious of accepting business opportunities which detract from the Park's quality.

Student comment included the observation that building pressure for building within the Park will grow as allocated land outside the Park is used up.

Tourism

Observations by residents included the following:

- That Ramsey Island is an example where commercial exploitation has seriously damaged the beauty and serenity
- That there should be more historical information and activities for tourists
- That agencies should take a higher profile in developing the National Park at the forefront of ecological tourism and employment, outdoor pursuits etc.
- That good care needs to be taken of beaches and paths year-round – since there are now as many people using the beaches on good winter days as on colder summer ones
- That villages should not veer from one extreme in season (traffic and noise) to another out of

season (unoccupied and silent)

- That there needs to be more stringent regulation of jet skis use
- That some visitors should be made aware that a National Park land is usually owned by farmers and is their workplace
- That there is little provision for those walking south to north across the county and that a service comparable to the coastal buses should be introduced
- That low impact activities and accommodation should be promoted e.g. boating, canoeing, sports, small B&B's, village pubs with food, craft workshops, camping on farms, package holidays with a Pembrokeshire theme

Visitors also made similar points, and showed great sympathy for the downsides of tourism on residents, including that overcrowding should be minimised so not to impact residents quality of life, that expanding populations for short periods of time is hard when managing employment and water sewage services.

Additionally,

- reliance on tourist trade could lead to exploitation of tourists that then make the area unattractive
- that the cost of holidaying in Pembrokeshire, particularly self-catering, is expensive and that this will put people off visiting
- promoting Pembrokeshire must not end up obliterating the identity and cultural heritage of Wales
- that lures such as sighting of dolphins, seals etc. must be safeguarded by better policing of pupping areas, so that people and dogs do not dissuade the seals from the Park coastline
- there should be better family provision and more fishing and sea trips

Visitors commended the camping facilities, excellent shops in the St Davids area, but would like to see more fishing and sea trips and jet skis kept away.

Energy

Suggestions that could be grouped under an 'energy theme' included, from residents:

- More sympathy towards individual and discreet renewable energy installations
- encourage sustainable housing (wind turbines, solar panels, wood-burning stoves)
- More positive support for alternative energy schemes - small turbines should be encouraged

And from visitors:

- More recycling and more recycling points (or better signed of existing ones) as a good way of cutting energy uses
- More solar and wind energy

Student comment highlighted the importance of switching to renewable energy at a domestic level as well as at a county/regional level, and the use of renewable power in reducing fuel poverty.

Services

Visitors and residents alike urged a greater provision of facilities for rubbish disposal.

Residents also pointed out a lack of evening entertainment facilities for visitors – and locals.

- retain local services (post office, doctor, shops) for use by local residents all year, not just for visitors
- ensure that amenities are kept noise free so as not to disrupt the everyday life of resident communities
- keep cliff sides safe
- Run the bus to St Justinian later into the evening
- St Davids needs more balanced and good quality retail outlets (e.g. Narberth), cathedral developments are dominant, need to ensure integration with general outlets on High Street and its hinterland

Community wellbeing, viability and impacts

See also Tourism subsection for this question.

Visitor

- I think a visitor is not the best person to answer this. I am sure that as much as they want the money visitors bring, they don't want to be swamped by us. Rights of population to economic well-being vs rights of all UK citizens to enjoy the Park. Not to be complacent with the communities that lie within the Park boundaries, this is their home – visitors should not take anything from them, privacy, security and above all not disrupt the environment with litter, pollution and commercialism. The residents - especially native - should come first. Make this part of the world thrive on its own unique merits. If it ain't broke – no casinos, amusement parks etc! Can you maintain the support of its residents?
- Keep small communities viable – ensure that visitors contribute to the economic viability of the area. Can the Park (and National Parks in general) be a model of sustainable development, conservation and tourism? Make use of natural resources as a platform for tourism
- Having enough people to look after the Park
- great to eat local produce and enjoy diversity of shops - part of the reason why we come. However it can be difficult for these places to survive year round, so their needs are as important as those of the visitors!
- More visits out of season (e.g. school parties)
- directing benefits both to conservation and to encourage the livelihood of local people and the marketing of local food, crafts and produce. Tesco's and encouraging local food suppliers to sell to cafes, hotels etc. Encourage local shopping. Promote organic foods. Discouraging multinational retailers. Careful and managed promotion of local skills and products, promotion of these services via e.g. mail order, internet shopping. Very good how local shops were selling local produce where possible.

- balance between trying to achieve profit from tourism without overcharging the visitor - eating out quite expensive
- Resentment of local people concerning over popularity of some areas by tourists.
- Residents cannot all rely on tourism to keep them through the Winter
- Regenerate the back streets of towns like Haverfordwest

Resident

- How about spiritual well being - doesn't seem to get much of a look at these days.
- The community provide host facilities, sporting activities - food and colourful events. They are not just extras in a nature theme park. Their inventiveness, creativity, idiosyncrasy and
- normalness makes it a living, breathing place. Maintain a balance between Park's essential ethos which in itself is a source of economic benefit and allowing people to live normal everyday lives within the Park.
- Offer more controlled commercial opportunities for local produce - art etc.
- The steady loss of the farming community within the Park. Keep people on the land who live on and maintain the landscape. Support is required to ensure that traditional (inefficient?) land use can be maintained to preserve the landscape. loss of farming community. Wales would be an ideal place to promote as an all organic farming community.
- Uneven distribution of wealth in Pembs - 'gin palace' developments of nondescript architecture vs poor social housing flats in some areas
- Need to promote Pembs culture – less of this due to influx of people moving into the area.
- Need more school leavers to be able to make careers in the Park area. If they leave the community is less vibrant and houses get sold to second home owners.
- NPA not heard when we were fighting for our small schools. Small communities need small schools or villages become retirement dormitories.
- Post Offices are also needed in small communities, which also help village stores to be viable.
- there is a poverty of ambition. Beauty is not enough - higher quality support and tourist services are needed including high-class shops, a better built environment and clean towns and villages
- promote year-round industrial enterprises sympathetic to the environment e.g. coppicing, production of rural furniture, commercial charcoal, fencing, furniture, wood craft, slate and ornamental stonework, sheep products - fleece and wool for clothing; leather work, cheese making in creameries and/or on-farms; milk products, confectionery.

Student

- protect small local businesses
- allow some development in order for people to have jobs to enable them to stay in the area

Engagement, education, communication

Visitor

- Education in the economic benefits of tourism. Raise awareness of nature and its importance on our very existence. Getting people to understand the value of what they see when they visit the Park and the role it plays in the local Community.
- A good idea to publish tide time tables in the tourist literature. Lists of B&B's, availability of food form shops, café's and restaurants specially for the Tourist.
- Informing visitors about events and what's on - we wanted to join in Community clubs.
- Involving people - getting children from the cities to take an interest in the Parks by getting them involved in the development.
- Set up a community service project in aspects of maintenance of paths and land.
- Promote local farm produce nationally (Welsh black beef, local cheese etc).

Resident

- social and economic wellbeing of our communities is part and parcel of the "threats and opportunities", the "safeguarding of natural and cultural heritage" and "promoting everyone's enjoyment" etc. In UK we have *National Parks* (which imply that the Nation, i.e. people, are the core of it. If the Community feels good about the Park, and is united with the NPA - all else will flow from it. Possibly, there is a feeling that 'the Park' is too formal and dictatorial to those who live in it. Informal gatherings could be arranged so that locals can be encouraged to be part of every issue. Listen to local people who's lives are affected. Ask the people who live there. Involvement at grass roots with Community members. Planning - better communication and consultative process.
- Very much a plus are the Rangers - always helpful, friendly and receptive, but still the perception appears to be that 'the Park' are 'them' and an elected body which comes in and 'tells us'. I would like to think that our money is used efficiently and plans drawn up after consultation and using local expertise - often I hear 'we could have told them that'
- Don't take away people's ability to use there own common sense. Let the people enjoy Pembrokeshire as they always have (its still here)
- Maybe a greater emphasis on a code of conduct for visitors to the Park areas would be of benefit to those whose home community it is
- develop local community control of involvement in sustainable tourism - as in hidden Britain
- Publicise out of the main season
- More information about historical archaeological etc. information and events

Student

- Encourage local people from other areas to help and take part in the welfare of the National park.
- Community spirit should be at the forefront of our minds. Getting the community involved e.g. fundraising brings the community closer. Talks should be given from other communities for inspiration
- keep the residents regularly informed therefore to help their community and feel not only part a

community but part of the environment.

Not given

- Controlled tourism
- Encourage enterprises in existing villages. Draw on local attractions; locally produced food, artists etc.
- How do we keep rural economies flourishing and small communities cohesive with such big interests dominating the larger economy?
- How do we keep the current building boom from swamping the quality of life? How do we get young families on the housing ladder without distorting the market?

Q3 Any other comments?

You will note from the annex that there are very many complimentary remarks made in this section. While, for space reasons, I eventually omitted these from this, the front end of the report, please be advised that I have left the brickbats in!

I have also for the purposes of this report selected specific proposals or issues where these do not directly duplicate sentiments already expressed above. The exception is those comments relating to Bluestone, which I have left in, as there is considerable strength of feeling which may not have emerged from the above.

Many of the issues raised in this section relate equally to foregoing questions.

1. Visitor

- consolidate army activity into fewer areas
- second home/holiday home purposes should be made a change of use which needs planning permission
- We found this survey very daunting at first sight and left it to the end of the holiday. I think a lot of people will have thrown it away (in the recycling bin of course), but we have tried to come up with some thoughts
- Cathedral "Board Trust" should work for greater good of St Davids and not to the detriment of local facilities.
- Too much diversification will dilute the special experience that the Park naturally has.
- Pembrokeshire is a quality brand - keep it that way
- Keep McDonalds/Starbucks/Burger King out of the Park!
- I like surfing, I also like climbing, it's good for both.
- Tighten up on your rules, instead of a board in the middle of nowhere, at least a warden who may/may not appear to enforce the law.
- Many of our walks need to be partly by car because public transport does not tie in with our times.

- With the emphasis presently placed on the quality of local ingredients and food, products might usefully be made the focus of a (kite marked) marketing campaign. In my view, the qualities that make Pembroke so special would mean that such an initiative would be pushing against an open door
- don't risk spoiling the country's UNIQUE environmental cultural and sheer natural beauty! Don't tell everyone!!! Too precious to spoil.
- One particularly unique aspect is the lack of light pollution of
- the night sky. It is wonderful to get such a clear view of the "greatest show on earth", this may be another aspect of the Park which is worth promoting.
- Lack of publicity in wider UK. Recent Sunday Times article in travel section is a good sign - more needed. Promote great combination of rural with beautiful beaches/surfing etc.
- Encourage small retailers to stay open by help with rates/rents/planning/car parking.
- Keep cars out of towns more (Tenby is showing the way).
- Encourage future generations to visit.
- A good road system and car parking at a reasonable £1.50 per day, enabled us to enjoy the special qualities of the Park as listed in '1' above! Thanks.
- Spot fines for abuse to the area, reducing litter and securing land for wildlife, what about the introduction of breeding programs and introduction of wildlife habitat areas - the glow worms.
- Perhaps all campsites should ensure recycling etc.
- Thanks for consulting us. We love it here and will be back!
- Could some development be put into the café on the beach at Newport sands. It's a great location, but rather concrete and grim and rather unreconstructed 1950's.
- greater co-ordination between PCNPA, local councils and National Trust. For example, integrated car parking ticket system
- Develop an eye-catching event to put Pembrokeshire on the world map. A few ideas:
 - Pembrokeshire Coast triathlon/Iron man challenge/sailing event/sea rowing.
 - Develop Pembs as a world centre of excellence e.g. marine conservation.
 - I was born in Dinas and wish to return to a new house in Neyland. As the development plan refuses to allow new build, as Dwr Cymru puts barriers to development it seems very difficult.
 - I still feel that unless I find out about the Park, I would be hard-pressed to understand what the Park is aiming to do. There is nothing that shouts "this is a National Park".
- The provision of more extensive public transport is important to me as a non

driver. I would welcome more integrated timetabling (although I note an improvement in this recently), I would also encourage improvements making more parts of the Park accessible to disabled visitors.

- Audio sticks available to pin point places of interest. Clubs: make it easy for visitors to join a National Park club and receive a badge, a passport (the passport could be stamped at venues affiliated to the scheme), and gifts available with the club logo.pens etc.
- In the main, many people we have spoken to have been visiting regularly for up to 20 years and many have actually upped sticks and moved to Pembrokeshire. That is a great compliment. This is our 3rd visit in a year.
- How energy efficient are the National Park offices and centres? Do they recycle and use local produce? Do the National Park vehicles run on bio fuel (or will they?).
- Accommodation standards are patchy - hard to find places to eat that look clean and welcoming.
- Keep bus fares low to deter car use. Advertise fares, timetables and ability to 'hail' a bus.
- Please to see 'Greenways' initiative and promotion of local farm produce (farmers markets, farm units etc).
- Preseli Green Dragon minibus is a brilliant idea too.
- Saints and Stones tours good to do by bike.
- We went on one of the free 'rockpool' walks (at Poppit Sands) and I was very pleased to hear the emphasis on protecting wildlife, not causing harm etc.
- Coastal path actually starts on the Carmarthen/Pembroke border at Pendine.
- Blue flag areas & dog free areas on beach:- rules are blatantly flouted at Poppit Sands in the dog free zone (6/9/06) and also ignored to a lesser extent at Whitesands. Not much fun if you choose a beach on the basis of it being clean & dog free!
- Your new office in Tenby is convenient, the displays interesting and informative. The staff member I spoke to was very pleasant and helpful.
- National Park is doing a difficult job well. We appreciate the Coast to Coast, the guided walks and walking leaflets and the bus services.
- Bluestone Project - why there? Surely we could have had the development/jobs without carving up a slice of pristine countryside.
- Did we really miss the B4313 out of Fishguard or was it not sign posted?
- Think about those of us who come out of season to relax and enjoy the area - we'd like to join in Welsh life which can be of benefit to the locals, surely?

Resident

- This is an area that could and should be made as popular as other tourist attractions in the

County. But improving the "transport" facilities and routing is important first!

- We urgently need plastic recycling facilities as well as truly green new builds.
- We need affordable housing for young and old people, in a vernacular style, not barrack blocks of concrete faced council houses with tiny gardens
- Allowing the Bluestone development inside the Park boundary (even if it wasn't a "special" bit) has
- been a serious mistake. Dense commercial developments must be avoided if the Parks character is
- not to be lost to commercialisation.
- Dual the A40 to Fishguard.
- Over advertising is not good! Keep it low profile!
- Maybe locals should receive concessions for parking in the County - the attractions after all are
- our year long amenities.
- We do not like the prospect of a holiday village being allowed in the Pembrokeshire National Park. It
- is setting a dangerous and far reaching precedent. It is not something London lawyers should be
- able to allow.
- This booklet was a very interesting read. I look forward to future copies.
- Any credibility you might have had was lost when you gave permission for the abominable
- Bluestone Development.
- Cycle paths/routes - are there any?
- I feel you are probably "preaching to the (already) converted", perhaps between us all we could
- encourage more people to take an interest in the Park and what's best for it.
- I visited the Llyn Peninsular last year and found it beautiful as far as scenery was concerned. But it felt rather desolate - no craft shops, few small pubs or café's - maybe I didn't look hard enough.
- Land management may require over-used areas to be fenced for a while, (to allow recovery).
- We love the Neyland to Haverforwest cycle route and would thoroughly enjoy more off road
- routes.
- All major towns outside the Park should be connected by Gateway paths for Wales and cyclists.
- I was saddened by the Court of Appeal's decision on the Bluestone project and have lost any respect for the senior managers of the National Park Authority.
- The Park needs to continue to be a living working environment or it will become a nonsense.
- Car parking for local residents visiting beaches for short stroll in evening could be concessional

- e.g. badge scheme.
- What is the point of this wasteful exercise? You take no notice of public concerns e.g. Bluestone Resort, LNG Terminal at South Hook.
- The National Park planning Authority is failing to insist on a percentage of low cost housing in the National Park. Inconsistencies also in planning consents.
- Pembrokeshire is a very special place. PCNP should make sure their tax payers know this!
- Hardwood should be banned from being used in the National Park.
- Charge holiday homes, caravans, three times the usual "council tax" Winter and Summer, not give them reductions, as these are commercial enterprises. Hotels and other businesses are drained by local taxation and rules and regulations that holiday properties don't abide by.
- I live in a lovely village, but I can not go for a walk with my dog unless it's on a busy road.
- Keep rail links open.
- Concentrate development investment in main settlements to enable public transport and other resources to be viable/cost efficient and reduce car travel.
- Pembrokeshire has more horses per square mile than any other county in the UK. Bridleways and access to rideable paths in the county needs addressing. Introduction of bridleways in the park with a continued promise of maintenance and development would be welcomed by thousands, especially in the south of the county.
- Not forgetting the premise - "NOT OURS BUT OURS TO LOOK AFTER"
- The wonderful countryside, clean beaches, spectacular views are the greatest asset, but some employment needs to be encouraged, or we will lose our young people and we should not rely only on tourism, which is fickle.
- I have walked the whole of the Coast Path and I think that the wardens do an excellent job of maintaining it. Have had 1 or 2 problems with dogs when the path goes through farmyards.
- National Park could join forces with National Trust/Wildlife Trust - if it doesn't already.
- The YHA recently announced the closure of a hostel at Trefin as others have said making it even more difficult to 'walk the path' - did they consent?
- BIG COUP - offer a home to Antony Gormley's statues!
- We keep a B&B - frequent complaints by visitors about dog fouling in park and on beaches!!!
- Please - no more caravan sites - keep up the good work - we really do appreciate living here.
- The people that live here like to take their dog on the beaches and we do not like paying the Park to use local beaches.

- Any more shortish walks available, especially circular, would be good.
- I live in Goodwick, near Goodwick moor. I do not want it too manicured, it is a beautiful moor.
- Just because we are locals we are not idiots. The National Park wouldn't look good if it weren't for centuries of hard work by the inhabitants.
- Rules within the 'Park' should be universal but this is not always so. Permission sometimes is denied for one person and incomprehensively given to another.
- Control must be by consent and cooperation, not by dictation.
- The only comment I have to make is that your HQ building is a beautiful red brick building that has
- looked out over Pembroke Dock for over 100 years and I am surprised it has not been listed. If it had been, I have no doubt that the entrance on the South side that looks like somebody has attached a garden shed to the wall would not have been allowed. Who in their right mind approved that? If somebody in the National Park had applied to put that on the side of their brick building - you would have refused it as being totally out of keeping, and rightly so. With all the money you waste, couldn't you afford to buy some bricks!
- We have forgotten the ideals of the founders. No other National Park would build a large holiday village within its boundaries.
- What is the point of all this if the Park Authority supports projects like Bluestone?
- It is difficult to separate the issues - they are interwoven and interdependent.
- I feel proud to live in the National Park.
- The coastal path is the jewel in the crown, do not compromise it in anyway.
- There is a clear need for consistency in Planning decisions, especially as the residents are disenfranchised by the appointment of the Authority Members as opposed to election.
- Don't give in to building development pressure! Or something very special will be lost.
- No, it's the rubbish on the beaches which is so awful. Action is needed!
- White Sands sustainable - renewable energy Café works - why not project to Poppit Sands – West Angle Bay etc. This project produces revenue without pollution.
- Efforts should encourage children to be more involved - such as remote tv from the islands, introduce to satellite navigation.
- Maintaining the purely natural environment of the Park areas, outside the towns, by strict control of vehicles selling food and drink.
- Well thought out advertising and fair pricing to bring more walkers and cyclists from overseas.
- Much more use of solar & tidal electricity generation.
- Maintain vigilance and if any signs of overuse, or misuse, or pressure for changed use emerges be most diligent in your considerations.

Student

- It is a rare & unique place, truly beautiful. The staff that we were involved with were pleasant and fun.

- They should support local businesses more.

Not given

- I presume the residents have been consulted. If not, I feel all Pembs residents should be consulted.
- The National Park has not given the lead we would have expected over Bluestone and LNG.

Appendix C

Atlantic Array Offshore Wind Farm

Review of Draft Environmental Statement

Volume 1 Offshore

Chapter 12: Seascape, Landscape and Visual Resources

Historic Seascape Character and Terrestrial Heritage Assets

On behalf of the Pembrokeshire Coast National Park Authority

REPORT PREPARED BY LUC
August 2012

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6 Introduction

Scope

- 6.1 LUC was commissioned by the Pembrokeshire Coast National Park Authority (PCNPA) to provide an independent review of the Atlantic Array draft Environmental Statement (ES), with specific reference to the landscape, seascape and visual resources of the area.
- 6.2 This work covers:
- Preparation of an independent Zone of Theoretical Visibility (ZTV) of the Atlantic Array proposal
 - Review of methodology and impacts on seascape, landscape and visual resources as contained in ch. 12 and annexes of the ES (Part 1);
 - Summary review of impacts on terrestrial heritage assets and historic seascape character, also contained in ch. 12 of the ES.
- 6.3 The study comprises a desk review of the ES methodology with comments on the method, baseline and judgements. We also undertook a site survey to key locations within the National Park to calibrate and confirm conclusions drawn from the desk study.
- 6.4 A summary and conclusions for all aspects covered in this ES review is provided in the final chapter of this report.
- 6.5 The review focuses on the information in the ES for this scheme. It does not comment on the Strategic Environmental Assessment (SEA) process or the selection of 'Round 3 Zones' by the Crown Estate.

The Proposal

- 6.6 The proposal is for an offshore wind farm of up to 1,500 megawatts (MW) of generating capacity in the Bristol Channel. The location of the proposal is shown in Figure 1.1 of the ES. It is approximately 27.5 km from Pembrokeshire.
- 6.7 The key components of the Atlantic Array Project are:
- Offshore turbines, including associated support structures and foundations;
 - Offshore electrical infrastructure;
 - Accommodation platforms;
 - Offshore meteorological masts and associated foundations;
- 6.8 The landfall site, cabling and associated onshore elements do not affect any part of Wales and this ES review is only concerned with the offshore components.
- 6.9 The final layout of the proposed scheme, notably the number of turbines and their precise layout, is yet to be devised and will depend on the individual capacity of the chosen wind turbines. A range of turbines with a generating capacity of between 8 MW and 3.6 MW is currently being considered. The project will be limited to 1500 MW of installed capacity and therefore the actual number of turbines will depend on their rated capacity. The maximum number of turbines within the project design envelope ranges between 188 and 278 turbines.

This review

- 6.10 The review by LUC of the seascape, landscape and visual impacts as set out in Chapter 12 of the ES was undertaken in two stages. Stage 1 comprised a desk review including:
- A review of the LVIA based on the IEMA (Institute of Environmental Management and Assessment) issue specific review criteria;
 - A review of the presentation of the results and clarity of the assessment; and
 - An assessment of the completeness of the information as a basis for decision-making.
- 6.11 **Stage 2** comprised a site visit on 20th August 2012 by a chartered landscape architect to:
- Examine the landscape sensitivity of the proposal and receptors within Pembrokeshire Coast National Park;
 - Check potential visibility from the coastline of Pembrokeshire Coast National Park and consider whether the viewpoints chosen are appropriate and representative and judgements appropriate;
 - Consider potential opportunities for mitigation or enhancement; and
 - Form an independent professional opinion on the landscape and visual impacts of the development proposal.
- 6.12 **Chapter 2** of this report presents the desk review. **Chapter 3** presents the results of the site visit. A separate note on historic seascape character and terrestrial heritage assets is provided in **Chapter 4**. A summary and conclusions for PCNPA are provided in **Chapter 5** .

2 DESK REVIEW

7 Desk Review

- 7.1 This section reviews the applicant's assessment of Seascape, Landscape and Visual Resources drawing on the IEMA (Institute of Environmental Management and Assessment) review criteria. This covers a review of:
- The baseline;
 - The method and approach against current guidelines and best practice;
 - The approach to identifying sensitivity, impact magnitude and significance;
 - Viewpoint selection (including any communication between the National Park Authority and applicant);
 - The completeness and robustness of the baseline information.
- 7.2 This review does not comment on the robustness of the Environmental Impact Assessment process (e.g. scoping process, consideration of alternatives), but rather, concentrates on the completeness and accuracy of the submitted ES Chapter and the adequacy of the information provided to inform the planning judgement.
- 7.3 Paragraph references refer to the ES documents as appropriate.

The scheme

- 7.4 The final layout of the proposed scheme, notably number of turbines and precise layout is yet to be devised and will depend on the individual capacity of the chosen wind turbines. The project will be limited to 1500 MW of installed capacity and therefore the actual number of turbines will depend on their rated capacity. For the purposes of the ES, parameters of the scheme have been set out according to a 'worst case scenario' in terms of number and height of turbines. This adopts of maximum tip height of 220m and an indicative hub height of 125m above sea level which has been used to generate the maximum extent of the zone of theoretical visibility (ZTV) and define the study area. The most visually prominent scheme in terms of number of turbines (278 no. 5 MW turbines) has been identified and illustrated within the photomontages. These parameters are set out in table 12.13 of the ES. The indicative layout of the scheme in terms of the shape of array and turbine locations is provided in Figures 12.1 and 12.2.

LUC's ZTV

- 7.5 As part of the brief LUC was required to generate an independent ZTV. This was undertaken using the parameters set out in Table 12.13 of the ES. The ZTV was developed using the 'worst case' scenario of 188 no. 8 MW turbines, 220m to blade tip and 125m to hub above Lowest Astronomical Tide (LAT). The indicative turbine layout set out in Figure 12.2 was used to generate the ZTV. A digital model of the turbine locations was obtained from the client.
- 7.6 We agree with the ZTV method set out in the ES, and while theoretically the maximum number of turbines could be 278 no. 5MW, the greater number of turbines would not affect the extent of the ZTV, since they are located within the same extent of proposed wind farm boundary.
- 7.7 The ZTV is calculated from a viewer height of 2m above ground level using a bare ground terrain model derived from OS Panorama height data using ESRI ArcGIS's Spatial Analyst extension. This terrain model does not take into account heights of structures and vegetation. Earth curvature and atmospheric refraction has been taken into account. The ZTV undertaken by LUC is provided as **Figure 1.1** of this report (ZTV to blade tip) and **Figure 1.2** (ZTV to hub height). It has been prepared to a buffer (study area) of 50 km and we agree with the ES that this is an appropriate study area. This ZTV contains some marginal differences to the ZTV generated in the ES.
- 7.8 There is a 28% increase in the extent of LUC's ZTV. Possible reasons for this difference could be because of the following: use of different terrain model, possibly based on an earlier proposed

turbine layout (the ES's 50km buffer slightly shifted which would possibly indicate that the turbine array used for their ZTV was slightly different or different software was used for the generation of the ZTV).

- 7.9 The ZTV generated by LUC has been used to identify and isolate effects on seascape, landscape and visual resources within the PCNP. We do not consider that the slightly larger ZTV will change results given distance to the scheme, particularly given the fact that the entire coastal edge is included within the ES's ZTV.

Scope

- 7.10 This review is concerned with the method and approach of the ES to seascape, landscape and visual impacts and the resulting judgements in relation to the Pembrokeshire Coast National Park. It refers specifically to Volume 3, Chapter 12, plus associated Annex 12.1 SVLIA Baseline Technical Report, Annex 12.2 SVLIA Impact Assessment tables and Volume 5 Figures. For simplicity the review concentrates on the operational, daytime effects of the scheme.

Design evolution

- 7.11 The principal evolution of the scheme's design came about through consultation on the Preliminary Environmental Information (PEI). This resulted in a reduction of the maximum number of turbines from 417 to 278 and a revised Array boundary, with reduced eastern and western extents. This is considered by the developer to have provided benefits to visual receptors within Pembrokeshire Coast National Park by:
- Reducing the horizontal extent of the array;
 - An increase in distance to the array, for example the viewpoint from Stackpole Head increases from 22.12 to 28.27km to the array and that from Caldey Island from 22.8 to 27.56km and Tenby from 26.89 to 31.83km;
- 7.12 The consultation draft of the ES does not indicate any further mitigation or enhancement.

LVIA method and approach

Study Area

- 7.13 Figure 1.1 of Annex 12.1 shows the site location and a 50 km buffer from the turbine locations and this is termed the 'study area'. A 50 km buffer would appear to be ample for a scheme of this type. Subsequent maps show the buffer area overlain with the ZTV for 8MW turbines to blade tip.
- 7.14 **The study area generated in combination with a ZTV is appropriate for an offshore scheme of this scale. The definition of the study area is based on the 'worst case' scenario in terms of height and number of turbines and extent visible above low water. The study area complies with current guidance.**

References

- 7.15 The applicant's LVIA has been based on the following a comprehensive set of current guidelines, as set out in para. 12.5.
- 7.16 The '*Guidelines for Landscape and Visual Impact Assessment 2nd Edition*' allows for a flexible approach to assessment of landscape and visual impacts, recognising that different methods and approaches will be relevant in different situations.
- 7.17 **The reference sources above are considered relevant and up-to-date and these constitute appropriate good practice guidance for the LVIA.**

SVLIA METHODOLOGY – assessment criteria and evaluation of significance

- 7.18 A detailed methodology is provided for the landscape and seascape resource in Volume 3, Annex 12.1, Appendix A. This is summarised in Volume 1, Chapter 12 which sets out tables covering the approach followed.

Sensitivity

- 7.19 Sensitivity is defined on a five point scale (negligible, low, medium, high, very high) for seascape/landscape (Table 12.3), visual receptors (Table 12.4).
- 7.20 The table covering seascape/landscape (12.3) is very generic and does not consider sensitivity to the type of development proposed. For a scheme of this type, we would expect a much more tailored approach based on an understanding of the nature of change (offshore wind turbines) and the landscape/seascape attributes likely to be sensitive to this type of change. We would wish to see particular emphasis on the sensitivity of perceptual and experiential attributes such as sense of remoteness and wildness, using special qualities of the PCNP as set out in the LDP, given that the offshore nature of the scheme means that these indirect impacts are the most relevant in relation to the designated coastline.
- 7.21 The sensitivity table is not useful as it stands in simply saying that a landscape which is recorded to be of very high sensitivity is a landscape that is “extremely sensitive” or landscape of high sensitive is one that is “particularly sensitive”. The table needs to give more clarity as to what is considered to be sensitive to offshore wind and the reasons why. In using this in the ES it is very difficult to draw a distinction between something which is “extremely” or “particularly” sensitive. We would also suggest that a five point sensitivity rating is unnecessarily complicated and that a simple ‘Low’ ‘Medium’ and ‘High’ category would be sufficient. A more in depth look at the method statement set out in Volume 3, Appendix A does not provide any further insight. It states that the definitions of sensitivity can only illustrate general categories, as sensitivity is project specific, that is, how sensitive the resource or receptor is to the particular development proposed. We would argue that the whole point of a S/LVIA is that it should be project specific and targeted to the precise development proposed – this is missing from the ES.
- 7.22 It is also worth noting that Table 12.3 also brings in information on significance of effects, which we would suggest is separate to a judgement on sensitivity.
- 7.23 The table covering visual sensitivity (Table 12.4) is clearer and more straightforward. For example it specifically defines internationally or nationally designated landscapes or National Trails as being of ‘Very High’ sensitivity, and describes the observers who are most sensitive. However, it is arguable if observers who have ‘travelled a long way’ or made exceptional effort to visit a viewpoint are more sensitive than those who have not. We agree with the visual sensitivity table presented in the method statement but, as indicated later in this chapter, this is not always carried through to the ES in practice. For Pembrokeshire Coast National Park this would suggest that all viewpoints should be accorded a ‘Very High’ sensitivity whereas in the ES many are ‘High’. The category of ‘Very High’ appears to be based on popularity of the view but the basis for assessing popularity is not known. In the context of the Pembrokeshire Coast National Park the wild, remote character of the coast is one of the most valued elements for visitors, and therefore ‘popularity’ is less relevant to assessing sensitivity.
- 7.24 **The approach for defining seascape/landscape sensitivity is generic and not targeted to the particular development proposed by the Atlantic Array scheme or the character of the specific landscape resource. For this reason we consider that this approach means that there is likelihood that sensitivity could be underestimated. A simpler 3 point scale would be more practical and avoid the need for very detailed decisions on the differences between an ‘extremely sensitive’ or ‘particularly sensitive’ landscape which are very difficult to justify in the assessment process. For landscape and visual, the approach adopted makes it difficult to calibrate results (difference between ‘Very High’ and ‘High’) across an area. For visual sensitivity, this is also a concern as some viewpoints are singled out as being of ‘Very High’ sensitivity, but the basis for this is unknown.**

Magnitude of change

- 7.25 Magnitude of change is similarly set out on a four point scale (no change, negligible, small, medium and large) for the landscape/seascape resource (Table 12.5) and visual receptors (Table 12.6). Here, the information on visual receptors seems to be appropriate, giving a clear indication of the impact of change on a view. The information for the seascape/ landscape resource places an emphasis on loss of features/pattern of the baseline resource as a means of

measuring magnitude of change. For coastal landscapes we would argue that where all the effects are indirect, the magnitude of change will largely relate to effects on perceptual experiential character/qualities and so an emphasis on loss of features may result in an underestimate of magnitude of change.

- 7.26 **It would be helpful if the judgement of magnitude of change was expanded to include indirect effects and included references to effects on perceptual and experiential character of the coastline and seascape and not just loss of features or patterns. This might reference for example, sense of remoteness, levels of tranquillity, expansive seascape etc.**

Significance

- 7.27 Schedule 4, Part 1.4 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2011¹ states that *“a description of the likely significant effects of the development on the environment, which should cover the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects of the development”* should be included in Environmental Statements. We note that for this scheme all effects identified are considered to be adverse.
- 7.28 The significance of effects on seascape/landscape, views and visual amenity is evaluated on a six point scale of None, Negligible, Minor, Moderate, Major, Substantial (ES ch. 12. Table 12.9). Significance of effects is assessed by reference to a matrix aligning judgements on sensitivity and magnitude of change (Table 12.10) which is a standard and acceptable approach. This table does not have categories for Moderate or Major effects and contains categories instead for Minor/Moderate and Moderate/Major. For the purpose of this assessment three categories of those effects i.e. those indicated as being of Moderate/Major, Major/Substantial or Substantial significance are regarded as ‘significant’ in EIA terms. The supporting appendix provides an indication of the nature of effect for each judgement.
- 7.29 In Table 12.10, the absence of any categories in the significance table covering moderate and major results in a ‘jump’ between ‘Minor/Moderate’ and ‘Moderate/Major’. We consider that an intermediate ‘Moderate’ category would be helpful.
- 7.30 **The approach to determining the significance of impact by aligning judgements on sensitivity and magnitude of change is generally acceptable. Although we highlight the jump between Minor/Moderate and Moderate/ Major. A ‘Moderate’ category would be helpful here since in this SLVIA it is the point above which predicted effects become significant.**

Graphic techniques

- 7.31 Generally the approach seems sound in terms of photography taken, equipment used, weather & visibility etc. Although all photomontages are only a guide and in reality it is likely that they underestimate impacts.
- 7.32 Visually the viewpoint locations look good with no obvious obstructions. We consider that there is an appropriate balance of beach/shore level viewpoints and those slightly back from the coastal edge showing foreground. We note that where foreground is visible in the photograph it provides a reference against which to judge the proposed change which is useful. In the following section of this report, covering the visual baseline (para 2.51. onwards) we comment on the appropriateness of views and any omissions.
- 7.33 The A2 montages do not meet minimum viewing distance as recommended within SNH 2006/7 guidance and the Methodology text regarding Photomontages seems to refer to A3 Figures with a 75 degree view – this requires clarification.
- 7.34 *Included Field of View: 110 degrees:* Guidance states that recommended horizontal and vertical field of view is dependent on what is required to illustrate the key characteristics of the visual resource and the key components of the proposed development. In the case of this proposed development the larger (110 degree) field of view chosen shows the full visual extent together with some land context.

¹ <http://www.legislation.gov.uk/ukxi/2011/1824/schedule/4/made>

7.35 Viewing Distance: 297mm @ A2

This viewing distance does not meet the minimum viewing distance of between 300 – 400mm as recommended in the SNH guidance for printed material intended to be hand held. A decrease in the included field of view to say 100 degrees for the majority of views, printed to the same dimension on A2 would increase the viewing distance to meet minimum recommendations while showing the full visual extent of proposals and retaining the landscape context. However, we do not think this is a significant issue.

Comments on Photography

7.36 On the whole the baseline photography is of a high standard and good weather, visibility and lighting conditions are evident throughout. However, all photomontages are only a guide and may underestimate impacts in reality. On this section of the Pembrokeshire Coast, Lundy is frequently very clearly visible and the North Devon Coastline often visible. Neither, Lundy or the North Devon Coast can be seen in the draft ES photomontages, requiring references to the wireline illustrations to understand the relative location of the proposed array.

Baseline

7.37 The IEMA ES Review Criteria² states that “the ES should describe the current condition of those aspects of the environment that are likely to be significantly affected by the development. An indication of how these aspects could be expected to develop if the project were not to proceed should also be given... the baseline environment should be evaluated, for example in relation to its sensitivity and importance’ and ‘Any limitations of baseline surveys should be recognised”.

7.38 The baseline study is set out in the separate Volume 3, Annex 12.1 SLVIA Baseline Technical Report. It clearly sets out chapters on the following:

- Planning policy and guidance (ch. 2)
- Seascape character baseline (ch.3)
- Landscape character baseline (ch.4)
- Visual resources baseline: (ch.5)

Seascape character

7.39 For PCNP, the baseline identifies the seascapes included in the Countryside Council for Wales study “Welsh seascapes and their sensitivity to offshore developments (2009)”. It sets out the key characteristics for the six seascape units in PCNP, although does not include any reference to their identified sensitivity, although sensitivity to large scale offshore wind energy schemes has been identified as part of the CCW published study.

7.40 We note that there is no assessment of the seascape character itself, with the information provided relying on a land-based assessment based on headland to headland visibility.

7.41 **Figure 2.1** shows the interaction of the Wales seascape character zones areas with the ZTV in PCNP.

Landscape character baseline

7.42 A detailed landscape character baseline is set out in ch. 12 and in detail in Annex 12.2.

7.43 For PCNP the baseline covers an unusual hierarchy.

7.44 Under the National heading it sets out summary information on the Pembrokeshire Coast National Park. Since this is a national landscape designation, it should not strictly be considered as part of the character baseline.

7.45 With regard to the Wales Regional Character Areas (LUC, 2008), the assessment states that although these areas have been considered, the principal source of information used in this report is LANDMAP. We consider that this is an omission and that the four relevant Wales Character Areas to parts of the National Park within the ZTV (43 West and North Pembrokeshire Coast, 47

²IEMA ES Review Criteria (IEMA, date unknown), para.2.1.

South Pembrokeshire Coast and 48 Milford Haven) would provide a helpful 'stepping stone' to the very detailed information offered by LANDMAP aspect layers (see information in Box 2.1 below). **Figure 2.2** shows the interactions of the Wales Regional Character Areas with the ZTV in PCNP.

- Box 2.1: Relevant information from CCW's Regional Character Area descriptions

Extracts from the Wales Regional Character Area descriptions
<p>43: West and North Pembrokeshire Coast</p> <p><u>Relevant key characteristics</u></p> <ul style="list-style-type: none"> • The varied coastline is defined by huge sandy bays and sheltered inlets. • The coastal landscape is nationally and internationally important for marine habitats and species, including species-rich maritime grasslands. The islands off the coast are the home of internationally important sea bird colonies. • The area's rugged coastline and high scenic qualities make the area a popular tourist destination. <p><u>Relevant text from the 'Visual/Perceptual' section</u></p> <p><i>"The sea and sky are prominent in most views, with the rugged coastal cliffs and islands being open and exposed to the elements..."</i></p> <p><i>"The high scenic qualities of the landscape and its rugged coastline have led to it becoming an extremely popular tourist destination"</i></p> <p><i>"The landscape retains its strong scenic and cultural identities that form important components of the coastal National Park".</i></p>
<p>47: South Pembrokeshire Coast</p> <p><u>Relevant key characteristics</u></p> <ul style="list-style-type: none"> • The coast is home to a variety of cliff-top and maritime habitats, with grasslands supporting rare species such as the early gentian and silver-spotted blue butterfly. • The area's varied coastline fringed by rolling agricultural fields is of great scenic quality. <p><u>Relevant text from the 'Visual/Perceptual' section</u></p> <p><i>"This is a spectacular coastal landscape, with its rugged, indented cliffs and golden beaches fringing a peaceful agricultural landscape of rich green fields and hedgerows".</i></p> <p><i>"The landscape is dominated by expansive views of the sea and sky, visible from across the character area".</i></p>
<p>48: Milford Haven</p> <p><u>Relevant key characteristics</u></p> <ul style="list-style-type: none"> • The ria landscape has long been admired for its scenic qualities, with the Haven mentioned in Shakespeare's Cymbeline. <p><u>Relevant text from the 'Visual/Perceptual' section</u></p> <p><i>"The Haven itself is a striking and dominant feature of this character area. Its waters, dotted by boats, have long been celebrated in art and literature".</i></p> <p><i>"The meandering and picturesque course of the waterways, intersected by gentle inlets and creeks, has few visual detractors".</i></p>

7.46 The Landscape Character Assessment completed for Pembrokeshire Coast National Park (adopted as SPG, July 2011³) is an important study that has also been omitted from thorough consideration as part of the SVLIA baseline. Relevant extracts from the descriptions for the Landscape Character Areas within the ZTV are included in Box 2.2 below. **Figure 2.3** shows the interaction of the Pembrokeshire LCA Character Areas with the ZTV within PCNP.

³ <http://www.pembrokeshirecoast.org.uk/default.asp?PID=249>

- Box 2.2: Relevant information from the PCNP Landscape Character Assessment (2011)

Extracts from the Pembrokeshire Coast National Park LCA (for LCAs within the ZTV)
<p>LCA 1: Saundersfoot Settled Coast</p> <p><u>Relevant special qualities</u></p> <ul style="list-style-type: none"> • There is a coastal feel with an open nature and attractive views along the coast, the view southwards from Amroth towards Tenby being notable for the prominent landmark of the church spire in the distance, seen above Monkstone Point in the middle ground.
<p>LCA 2: Tenby</p> <p><u>Relevant special qualities</u></p> <ul style="list-style-type: none"> • The coastal topography is distinctive and there is an intimate association between the town and the shore - with framed views from some streets out to the traditional harbour and the sandy beaches and The Burrows - and Caldey Island, lying close off shore.
<p>LCA 3: Caldey Island</p> <p><u>Relevant special qualities</u></p> <ul style="list-style-type: none"> • A small scale settled agricultural area offering a close contact with the coastal environment. • Caldey Island is unique amongst the off-shore islands of Pembrokeshire in that it has a long, continuous history of human settlement with formal religious associations. • There is a strong historical and spiritual aspect provided by the long-established church and monastery buildings.
<p>LCA 4: Manorbier/Freshwater East</p> <p><u>Relevant special qualities</u></p> <ul style="list-style-type: none"> • This area of farmland landscape with traditional built forms predominant in the villages and agricultural buildings is pleasant, with a coastal feel, enhanced by attractive views of coastal cliffs to the east. • There is a very strong historical and cultural sense of place here, which is very different from that encountered in north and west Pembrokeshire.
<p>LCA 5: Stackpole</p> <p><u>Relevant special qualities</u></p> <ul style="list-style-type: none"> • The beaches of Pembrokeshire form a very important part of the coastline and the concept of the National Park. Culturally they hold high significance in the minds of local inhabitants and visitors • The National Trust's Stackpole Estate is set in an area of outstanding natural beauty, and much of it is designated as a Site of Special Scientific Interest. Some 202 of its 810 hectares are also designated National Nature Reserves managed jointly with the National Trust and The Countryside Council for Wales. These factors underpin the outstanding cultural landscape value attributed to this area.
<p>LCA 6: Castlemartin/Merrion Ranges</p> <p><u>Relevant special qualities</u></p> <ul style="list-style-type: none"> • This large tract of exposed open coastal grassland landscape has a settled feel with strong coastal character. There are extensive views of the open sea from much of the higher ground and along the coast from the coastal path • The prominent line of church towers and spires along the ridgeline villages of Warren, St. Twynells and St. Petrox are locally distinctive features which still dominate the horizon • Some of the limestone cliff coast has fine examples of rock formations, notably at Elegug Stacks, underlining the outstanding geological landscape value in parts of the area • The recorded historical and archaeological features are of national significance
<p>LCA 7: Angle Peninsula</p> <p><u>Relevant special qualities</u></p> <ul style="list-style-type: none"> • There is a strong coastal feel imparted by the peninsula and the views out over the mouth of Milford Haven to the headland of St Ann's Head, with its lighthouses and cottages, and up the estuary to

<p>the oil terminal piers. This atmosphere is enhanced by the traditional building character within Angle village.</p> <ul style="list-style-type: none"> • This river valley and estuary landscape has an unsurpassed concentration of remains, reflecting maritime conquest, settlement, commerce, fishing, defence and industry spanning the prehistoric to modern periods
<p>LCA 9: Marloes</p> <p><u>Relevant special qualities</u></p> <ul style="list-style-type: none"> • The high proportion of coastal views, including those out to the islands of Skomer and Skokholm, contribute greatly to the sense of place and the often outstanding visual and sensory landscape value of this large area. • The long-established defensive role of the peninsula is underlined by the range of archaeological features recorded, ranging from the Iron Age through to modern military installations. • This river valley and estuary landscape has an unsurpassed concentration of remains, reflecting maritime conquest, settlement, commerce, fishing, defence and industry spanning the prehistoric to modern periods.
<p>LCA 12: St Brides Bay</p> <ul style="list-style-type: none"> • This is a very large tract of landscape with a strong visual relationship to the coast from the broad views across St. Brides Bay and along the coastline, which is mostly undeveloped • The sight and sound of this expanse of sea is a constant presence, a perception heightened by the sound of waves breaking onto the cobble beach when there is sufficient wind to raise the swell, and apparent in short, medium and long distance views • The cultural value is further supported by the continuous tract of open access National Trust land along the northern stretch of coast running eastwards from Solva almost to the northern tip of Newgale Sands.
<p>LCA 28: Daugleddau</p> <ul style="list-style-type: none"> • There is a great sense of tranquillity here, produced by the enclosed large water body, whether at high or low tide, and the feeling of being on a quiet backwater. • There are framed views at intervals along shoreline roads and paths. • There is a prevailing sense of a sheltered, well cared-for wooded farmland and parkland landscape of long-established private estates and secluded houses, contrasting with the more open shoreline villages and hamlets with views along the branches of the estuary • This river valley and estuary landscape has an unsurpassed concentration of remains, reflecting maritime conquest, settlement, commerce, fishing, defence and industry spanning the prehistoric to modern periods.

7.47 Under the heading of LANDMAP the baseline describes the relevant 5 LANDMAP aspect layers for each local authority.

7.48 **Overall, we consider that the baseline landscape character information for Pembrokeshire Coast National Park omits a key source of information namely the published National Park Landscape Character Assessment. The reliance on using the detailed LANDMAP data covering all five aspect layers risks losing the bigger picture among the *minutiae* of detail held on LANDMAP. The use of the generic typologies does not provide locally specific character information against which to judge the proposal, although we note that the detailed aspect areas are also referred to. We consider a strategic level of assessment using the Wales regional LCAs and published Pembrokeshire Coast NP LCA would have been a more helpful starting point.**

Landscape Designations - A nationally important landscape

7.49 Apart from the information noted above under landscape character, the SVLIA Baseline Technical Report (Annex 12.1) does not have a specific heading covering on landscape designations. However, they are described under the planning policy section which sets out special qualities of the PCNP as defined in the LDP with some further brief information under landscape character. We consider that a full analysis of the special qualities and reasons for designation of these areas is required as part of the baseline. We note, however, that in the SLVIA (ch.12), the special

qualities of the Pembrokeshire Coast National Park are identified with an associated assessment of effects (Table 12.18 Pembrokeshire).

- 7.50 **A proper understanding of the importance and sensitivity of the nationally designated and protected landscapes of Pembrokeshire Coast National Park is essential. This should be set out as part of the baseline report and carried forward to the impact assessment.**

Visual resources baseline

- 7.51 Vol 3, Annex 12.1 ch 5 describes the visual resources baseline. This describes the ZTV and some 18 individual viewpoints in PCNP derived through consultation, all of which were visited as part of the baseline information gathering. Viewpoints were discarded or withdrawn during the baseline process due to duplication, repetition or lack of views towards the Array. In total nine land-based viewpoints in PCNP were taken forward to the full ES assessment process. Appendix C of Annex 12.1 sets out the viewpoint consultation and selection schedule. The views to the west (for example 1a Skomer Island, 1b. Martin's Haven and 1c. Preseli Hills) were withdrawn from the assessment following the post PEI design evolution, with the greater distance to and change in extent of the scheme meaning they are no longer in the study area and we agree with this conclusion. For View 1. St Ann's Head it notes that other viewpoints nearby are representative although no nearby viewpoints are included (although it is likely that distance from the scheme will preclude significant impact here). For View 1d. Castlemartin it is concluded that there is no significant view, with which we agree. We note that for View 2a. St. Govan's Chapel that View 2. St. Govan's Head is considered to be representative, and while we agree with this in landscape and visual terms, given the acknowledged importance of this heritage asset and its functional and symbolic relationship with the sea we suggest that it should also have been included as a separate view. **Figure 2.4** shows the interaction of the ZTV with the PCNP and the viewpoints considered in the ES.
- 7.52 The viewpoint baseline does not include any information about visual receptors or the sensitivity of viewers at each viewpoint.
- 7.53 **Overall, the visual resources baseline and viewpoint selection for PCNP process seems appropriate.**
- 7.54 **It would be useful if the baseline contained more information about the types of viewer and their sensitivity. In the impact assessment, it is not clear how sensitivity has been differentiated between 'High' and 'Very High'. For Pembrokeshire this is illustrated for Viewpoint 2: St. Govan's Head which is identified as 'Very High' sensitivity while all other views within the National Park (and on the Pembrokeshire Coast National Trail) such as 4: Stackpole Head, 7. Manorbier are 'High'. The reason for this difference is not known. We suggest an additional view should have been included from St. Govan's Chapel as well as St. Govan's Head. We note that photomontages are only a guide and in many cases visual impacts may be underestimated.**

Recreation receptors

- 7.55 The baseline (para 5.224) identifies The Pembrokeshire Coast Path as a recreation receptor. The National Trail covers 186 miles predominantly within the Pembrokeshire Coast National Park. The section of trail within the ZTV occurs between St. Ann's head to Amroth. There are open views out to sea from the majority of the route. Key viewpoints relevant to the National Trail are St. Govan's Head, Broadhaven Beach, Stackpole Head, Manorbier Beach, Lydstep, Tenby and Amroth. The baseline technical report identifies the Pembrokeshire Coast National Trail as a route where receptors will experience sequential effects.

Impact assessment

- 7.56 The ES covers the construction, operation and decommissioning phase of the Atlantic Array in detail. For the purposes of this review we have concentrated on the operational effects during the daytime. Construction effects vary and for the end of the construction period are mainly the same as for the operational phase.

- 7.57 The operational assessment has appropriately presented the potential effects on the landscape and visual resource providing an assessment of:
- Seascape units;
 - The landscape resource (landscape);
 - Visual receptors;
- 7.58 As noted, the effect of landscape designations is mainly subsumed within the information on landscape character, apart from the tables in Appendix G of Annex 12.2.

Effects on Seascape

- 7.59 The ES assesses impacts at the following areas within Pembrokeshire Coast National Park.

Seascape Unit	Impact	Significance
36: Skomer Island to Linney Head	Sensitivity: High Magnitude: Negligible	Minor
37: Milford Haven	Sensitivity: High Magnitude: Negligible	Minor
38: Linney Head to St Govan's Head	Sensitivity: High Magnitude: Small	Minor/Moderate
39: St Govan's Head to Castle Head	Sensitivity: High Magnitude: Small	Minor/Moderate
40. Old Castle Head to Giltar Point/Caldey Island	Sensitivity: High Magnitude: Small	Minor/Moderate
41: Giltar Point to Pembrey Burrows (Carmarthen Bay)	Sensitivity: Medium (in the Annex 12.2 Impact assessment tables and High in the main ES report) Magnitude: Small	Minor (should be Minor/Moderate if High sensitivity)

- 7.60 **Commentary on seascape impacts:** The ES acknowledges that the Atlantic Array would place a significant new feature into the seascape of the Bristol Channel. In relation to Pembrokeshire, it notes that where it is seen in the context of the uncluttered coastal edges of plateau cliff tops, the linear spreading horizontal form of the array is more readily assimilated into the existing character (para. 12.610). It notes that the array would fit more comfortably into these open seascapes due to the pale grey colour of the turbines often matching elements of the sea or sky and the simple form of the proposals in the context of the expanse of water and sky. This is a positive conclusion that does not fully take into account the open, wholly undeveloped seascape and context for these wild, remote locations. It is also important to recognise that many visitors come to the PCNP specifically to enjoy the undeveloped coastline. None of the seascape units in Pembrokeshire are predicted to have significant impacts.

Effects on the landscape resource (LANDMAP)

7.61 The tables below set out the relevant landscape character types / areas for PCNP.

Landscape Character (LANDMAP Visual & Sensory)	Impact	Significance
Angle	Sensitivity: High Magnitude: Negligible	Minor
Beach	Sensitivity: High Magnitude: Small	Minor/Moderate
Caldey Island	Sensitivity: High Magnitude: Small	Minor/Moderate
Castlemartin	Sensitivity: High Magnitude: Small	Minor/Moderate
Freshwater East	Sensitivity: High Magnitude: Small	Minor/Moderate
Giltar Point	Sensitivity: High Magnitude: Small	Minor/Moderate
Hill Mountain	Sensitivity: High Magnitude: Negligible	Minor
Industry/Milford Haven	Sensitivity: Negligible Magnitude: Negligible	Negligible
Lydstep Haven	Sensitivity: High Magnitude: Small	Minor/Moderate
Manorbier	Sensitivity: High Magnitude: Small	Minor/Moderate
Manorbier	Sensitivity: High Magnitude: Small	Minor/Moderate
Marloes Coast	Sensitivity: High Magnitude: Negligible	Minor
Marros and Wharley Point	Sensitivity: Low Magnitude: Negligible	Negligible/Minor
Marros Hills	Sensitivity: Negligible Magnitude: Negligible	Negligible

Landscape Character (LANDMAP Visual & Sensory)	Impact	Significance
Marros Sands	Sensitivity: Low Magnitude: Negligible	Negligible/Minor
Marros-Pendine coastal valleys	Sensitivity: Negligible Magnitude: Negligible	Negligible
Martletwy	Sensitivity: High Magnitude: Negligible	Minor
Merrion Camp	Sensitivity: High Magnitude: Negligible	Minor
Merrion Range Dunes	Sensitivity: High Magnitude: Negligible	Minor
Merrion Ranges	Sensitivity: High Magnitude: Small	Minor/Moderate
North Beach	Sensitivity: High Magnitude: Negligible	Minor
Penally Beach	Sensitivity: High Magnitude: Negligible	Minor
Sageston	Sensitivity: High Magnitude: Negligible	Minor
Saundersfoot	Sensitivity: High Magnitude: Negligible	Minor
Saundersfoot Bay	Sensitivity: High Magnitude: Small	Minor/Moderate
Simpson Cross	Sensitivity: High Magnitude: Negligible	Minor
St Ann's Head	Sensitivity: High Magnitude: Negligible	Minor
St Govan's Head	Sensitivity: High Magnitude: Small	Minor/Moderate
St Ishmael's	Sensitivity: High Magnitude: Negligible	Minor

Landscape Character (LANDMAP Visual & Sensory)	Impact	Significance
Stackpole Court	Sensitivity: High Magnitude: Negligible	Minor
Stackpole Warren	Sensitivity: High Magnitude: Small	Minor/Moderate
Summerhill	Sensitivity: High Magnitude: Negligible	Minor
Templeton	Sensitivity: Negligible Magnitude: Small	Negligible/Minor
Tenby	Sensitivity: High Magnitude: Small	Minor/Moderate
The Burrows	Sensitivity: High Magnitude: Negligible	Minor
The Ridgeway	Sensitivity: High Magnitude: Small	Minor/Moderate
The Ritec	Sensitivity: High Magnitude: Negligible	Minor
Wooded Valley	Sensitivity: High Magnitude: Negligible	Minor

Commentary: LANDMAP character effects – Pembrokeshire Wales: No significant effects on the landscape resource (i.e. Moderate/Major or above) are identified for Pembrokeshire Coast National Park. It is assumed that this is largely due to the distance from the scheme and consequently a smaller magnitude of change. The sensitivity ratings outlined in the draft ES include consideration of the LANDMAP evaluation.

7.62 The following LANDMAP aspect areas (Visual & Sensory) are missing from the tables in Volume 3, Annex 12.2:

- Great Castle Head (Cliffs and Cliff Tops)
- Kilpaison Burrows (Dunes and Dune Slack)
- Angle Bay East (Intertidal)
- Dale Bay (Intertidal)
- Frainslake Sands (Intertidal)
- Sandy Haven (Intertidal)
- Eastern Cleddau (Open Lowland Valleys)
- Druidston (Open Rolling Lowlands)
- Marloes Valley (Open Rolling Lowlands)

- Daugleddau (River)

7.63 This is likely to be as a result of the greater extent of the new ZTV.

Effects on the Pembrokeshire Coast National Park

7.64 This is subsumed within the section considering effect on landscape character, whereas effect on landscape designations should ideally be considered separately. Table 12.18 correctly identifies the Special Qualities of the National Park (taken from the Pembrokeshire Coast National Park Local Development Plan, 2010). There is no formal assessment of their sensitivity or the magnitude of change experienced. No significant changes to special qualities are predicted either for the construction or operational phase of the Atlantic Array for Pembrokeshire Coast National Park. A summary of operational effects on designated landscapes is contained in Vol 3, Annex 12.2, Appendix G Operational Phase – Designated/Defined Landscape Effects, although this does not refer to special qualities and so it is not entirely clear how this judgement is made.

Effects on Views

7.65 The table below sets out the relevant viewpoints within PCNP. Those viewpoints where the ES identifies significant visual impacts are highlighted.

<i>Viewpoint</i>	<i>Impact</i>	<i>Significance (dark green shading indicates those that are significant in EIA terms)</i>
2: St. Govan's Head	Sensitivity: Very High Magnitude: Small	Moderate (but using ES method this should be Moderate/Major)
3: Broadhaven, Bosherton	Sensitivity: High Magnitude: Small	Minor/Moderate
4: Stackpole Head	Sensitivity: High Magnitude: Small	Minor/Moderate
7: Manorbier	Sensitivity: High Magnitude: Small	Minor/Moderate
8: Lydstep Point	Sensitivity: High Magnitude: Small	Minor/Moderate
9: Caldey Island	Sensitivity: High Magnitude: Medium	Moderate/Major
10: Tenby	Sensitivity: High Magnitude: Negligible	Minor
11: Colby Estate	Sensitivity: High Magnitude: Negligible	Minor
12: Amroth	Sensitivity: High Magnitude: Negligible	Minor

7.66 **Commentary on visual impacts –PCNP:** Within the National Park a significant visual effect (Moderate/Major) is only recorded at just one viewpoint – 9: Caldey Island. This is a high sensitivity receptor with a distant open view some 27.56 km from the array which would occupy 37% of the 110 degree panorama, recorded as a small magnitude of change.

7.67 Using the ES method set out in Table 12.10, a 'Very High' sensitivity and 'Small' magnitude of change should also give a 'Moderate/Major' effect and therefore technically the ES should also record View 2. St. Govan's Head as predicted to have significant effects. This would then lead to questioning why equally valued and important views in close proximity, for example at Stackpole, would not be the same in terms of predicted impacts. This is partially in the way that sensitivity has been defined and the unusual distinction between 'Very High' and 'High' as explained in this report previously (paras 2.33-2.34). Receptors at Stackpole, and other viewpoints, are cited as being users of a public right of way. The fact that this is a National Trail in a National Park should, in our opinion 'elevate' it (and other similar viewpoints) to the highest level of sensitivity. See further in paras 3.20 and 3.21 of this report. In our opinion all viewpoints within the National Park should be accorded the highest level of sensitivity.

Pembrokeshire Coast National Trail

- 7.68 The draft ES (para 12.1004) notes that a considerable length of the Pembrokeshire Coast National Trail lies within the ZTV and that there are many opportunities for views of the proposed scheme in a walk along the coastline. The sequential effect on receptors is assessed as Moderate/Major. This is significant in EIA terms. This is an important conclusion, and interesting since in the draft ES none of the viewpoints on the National Trail are predicted to have significant effects. This finding is not brought forward to the summary and conclusions for Chapter 12 (12.1104 onwards) and it is not referred to in the ES Non-Technical Summary. This is an important omission in relation to PCNP.

8 Site Visit

- 8.1 This section presents the results of LUC's site visit to PCNP on 20th August 2012. The site work provides a professional opinion on:
- Impact on the National Park's special qualities
 - Sensitivity of and potential impact on landscape and seascape character
 - Sensitivity and potential visual impact
 - Opportunities for mitigation
- 8.2 LUC visited the southern section of the National Park between St. Govan's Head to the west and Amroth to the east, with visits to selected points along the coast and walking short sections of the Pembrokeshire Coast National Trail. This short visit was not intended to form a new LVIA, but simply to check the results in the draft ES.

Impact on PCNP special qualities

- 8.3 Our site visit confirms that the proposal, even given the separation distance of 27km, would have an effect in the following special qualities of the National Park:
- Coastal splendour;
 - Islands – notably the backdrop and view from Caldey; and
 - Remoteness, tranquillity and wildness – and notably the role of the uninterrupted Atlantic seascape views in contributing to these.
- 8.4 The Array would be discernible from almost the entire coastline in the southern section of the National Park from Amroth in the east to beyond St. Govan's Head in the west. In certain clear weather conditions it would be a focus in coastal views and would frequently be seen as the backdrop to Caldey island and in the foreground to Lundy. It would be a visible development in a wholly undeveloped seascape and viewed in the context of a remote wild coastline.

Impact on seascape character

- 8.5 There are six relevant seascape units in the PCNP. Of these the coastal element of three were reviewed as part of the site visit.
- 39: St. Govan's Head to Old Castle Head
 - 40: Old Castle Head to Giltar Point/Caldey Island
 - 41: Giltar Point to Pembrey Burrows

Considering sensitivity

- 8.6 In terms of sensitivity, all seascape units apart from 41 are assessed as 'High' (41 = 'Medium' in Annex 12.2 and 'High' in ch. 12.). We would generally agree with these definitions of sensitivity and suggest that it is 'High' for all. However, given that sensitivity does not relate to distance, we would wish to know what is required to elevate a seascape unit to 'Very High' sensitivity and why this nationally important seascape is not within this highest category.

Considering magnitude of change

- 8.7 In the draft ES, seascape units 36 and 37 are considered to receive a 'Negligible' magnitude of change and the remaining 'Small'. Given the size of the units and the fact that none of them form part of the area within which the Array is located, we broadly agree with these judgements. We do not agree with the draft ES which notes that development would be more readily assimilated in the context of the uncluttered coastal edges of plateau cliff tops in Pembrokeshire. Our site visit

indicated that the array will form a new developed feature in the seascape sometimes appearing behind or in combination with Caldey Island. It would also frequently appear as a linear feature within a vast open seascape, experienced from locations valued for their qualities of remoteness and wildness within the National Park. For those seascapes which occur within 5km of the proposed Array, we suggest that the magnitude of change will be larger – diminishing with distance from the proposal.

Predicted significance

- 8.8 Using the above methodology and table 12.9 of the ES to assess significance, we suggest that for seascape units 38, 39, 40 and 41 the impacts should be elevated to 'Moderate'. This is relevant, but in terms of this SLVIA methodology it is not significant.

Impact on landscape character

General comments

- 8.9 A very large number of LANDMAP visual and sensory units were considered in the ES. Some of these coinciding with the coast edge were reviewed as part of the site visit. These included:
- St. Govan's Head: Cliffs and Cliff Tops
 - Giltar Point: Cliffs and Cliff Tops
 - Intertidal aspect areas and Beaches
- 8.10 Given the very complex nature of LANDMAP and the short time for the site visit, some general observations are provided here. For all these areas, the seascape and open Atlantic views are a key part of their quality and character. However it is acknowledged that effects on views are assessed under visual impact. Sensitivity is undoubtedly at the highest level i.e. 'Very High' in this assessment. We would consider magnitude of change to be 'Medium' according to the criteria outlined in the draft ES Table 12.5; i.e. partial loss of one or more key characteristics or introduction of new elements that may be prominent. Therefore, for these landscapes on the extreme coastal edges of Pembrokeshire, we suggest that impacts will range from between Moderate and Major, with some areas the predicted effects on character being significant in EIA terms. We would refer to significant effects in relation to character at key remote beaches which are orientated towards the array where views will be a focus – such as at Barafundle – and cliff-top locations valued for their remote qualities such as at Stackpole Head, Lydstep Point and Caldey Island.

Visual impact

- 8.11 The following ES viewpoints were visited as part of the site visit:

- Viewpoint 3: Broadhaven Beach, Bosherton
- Viewpoint 4: Stackpole Head
- Viewpoint 7: Manorbier
- Viewpoint 8: Lydstep Point*
- Viewpoint 9: Caldey Island
- Viewpoint 10: Tenby
- Viewpoint 11: Colby Estate*
- Viewpoint 12: Amroth

*For viewpoints 8 and 11, the precise location of the viewpoint was not accessed due to time constraints. The Lydstep headland was visited to gain an impression of views from the headland to the proposed development in relation to Caldey Island; and the Colby Estate to gain an impression of the development from slightly more elevated land inland.

- 8.12 Generally, the photomontages seemed to provide an accurate representation of the scheme and viewpoints well chosen, with a good combination of beach level and cliff top views. One exception

is viewpoint 3: Broadhaven Beach. Here, a viewpoint to the west of the beach (close to the car park and main beach access point) would provide a better representation of receptors and also centre the Array within the view, although this is a minor comment. View 11 helpfully illustrates the scheme from slightly elevated land inland and a further viewpoint of this nature would have been useful as context. We note that View 9 (Caldey), photomontage is missing and this would be particularly useful in relation to this Very high sensitivity viewpoint. We agree that a further viewpoint from St. Govan's chapel would also be useful, given the importance of this heritage asset.

- 8.13 The ES only predicts one significant visual impact at Caldey Island (View 9) although St. Govan's Head (View 2) should also be recorded as Moderate /Major (therefore significant in ES terms). The site visit confirms that the development will be visible from all the high sensitivity viewpoint locations along the whole of this southern section of the National Park.

Considering sensitivity

- 8.14 In terms of sensitivity, we suggest that all of the views in PCNP should be in the highest category given that they are all within a nationally designated landscape, on a National Trail (except viewpoint 11 Colby, although since this is National Park and on a National Trust estate it could also be 'Very High'). Viewpoint 10, from Tenby, could be recorded as less sensitive in term of its urban context, although the very high number of receptors at this location, on the beach and in the town would also justify this being in the highest category.
- 8.15 The site visit indicated that there is no difference between St. Govan's Head and Caldey Island, which the ES determines as being of 'Very High' sensitivity and for example Stackpole Head, Broadhaven Beach, Manorbier and Lydstep Point. We suggest all should be recorded as having the highest sensitivity.

Considering magnitude of change

- 8.16 Using the ES terminology, a 'Small' magnitude of change is a *'minor change in baseline which is distinguishable from surroundings whilst composition and character will be similar to the pre change circumstances'*. A 'Medium' magnitude of change (relevant to Caldey Island only) is a *'partial change in character and composition of the baseline. Change may be prominent but not substantially alter scale and character....'*
- 8.17 For views 2,3,4,7, 8, 9 and 10 we consider that 'Small' is an underestimate using the terminology of the ES since the view out to sea is the key focus. It will change from a wholly open, uninterrupted view across the Atlantic seascape to one where the ES notes that the development will form a distinct and recognisable feature and focus and increase visible development. For these views where the development is around or under 30km distance, we suggest that the magnitude of change would more correctly, if aligning with the ES methodology, be described as 'Medium' – a partial change in character and composition of the baseline through the introduction of new elements.
- 8.18 For view 9: Caldey Island this would also go up a notch to Medium/Large. On Caldey, the view from the wild exposed southern coast of the island is unexpected – it is reached through the sheltered side (facing Tenby). Here, the view is one of sudden exposure to the Atlantic across to North Devon, with the Array forming a visible development between Caldey and Lundy in an otherwise uninterrupted panoramic seascape stretching from Worm's Head to the east and St. Govan's head to the west.
- 8.19 For view 11 and 12, Colby and Amroth we agree that the greater distance (at 40.70 km and 38.95 km respectively) would reduce the magnitude of change. The photomontages and verified through site work suggest that this is 'Negligible/Small'.
- 8.20 The site visit confirmed that the photomontages are only a guide, and even on a day without particularly good visibility it was possible to make out Lundy and more distantly the North Devon Coast, neither of which is shown in the photomontages.

Predicted significance

- 8.21 Using the above methodology and Table 12.10 of the ES to assess significance results in the following changes to the predicted visual impacts.

<i>Viewpoint</i>	<i>Sensitivity and Magnitude of Change Based on site visit</i>	<i>Significance Based on site visit</i>
2: St. Govan's Head	Sensitivity: Very High Magnitude: Medium	Major/Substantial
3: Broadhaven Beach, Bosherton	Sensitivity: Very High Magnitude: Medium	Major/Substantial
4: Stackpole Head	Sensitivity: Very High Magnitude: Medium	Major/Substantial
7: Manorbier	Sensitivity: Very High Magnitude: Medium	Major/Substantial
8: Lydstep Point	Sensitivity: Very High Magnitude: Medium	Major/Substantial
9: Caldey Island	Sensitivity: Very High Magnitude: Medium	Major/Substantial
10: Tenby	Sensitivity: Very High Magnitude: Small	Moderate/Major
11: Colby Estate	Sensitivity: Very High Magnitude: Small/Negligible	Moderate
12: Amroth	Sensitivity: Very High Magnitude: Small/Negligible	Moderate

8.22 The table above indicates the difficulty of distinguishing views of 'Very High' and 'High' sensitivity and the fact that it may elevate results. In our opinion it is right that views 2,3,4,7,8,9 and 10 all move up so that they are predicted to as incurring significant impacts. We would question whether Major/Substantial is correct and suggest that 'Major' would be a more accurate definition of effects (there is no Major in the draft ES terminology). We agree that the views from 11. Colby and 12. Amroth, which are more distant are not significant in EIA terms.

Pembrokeshire Coast Path (National Trail)

8.23 The draft ES (para 12.1004) notes that a considerable length of the National Trail lies within the ZTV and that there are many opportunities for views of proposal in a walk along the coastline. The sequential effect on receptors is assessed as Moderate/Major. This is significant in EIA terms and from our site visit we agree with this conclusion. We note that there will potentially be views of the Array from the start of the National Trail at Amroth all the way along the coast as far as St. Govan's Head to the west – a considerable proportion of the route.

9 Review of effects on historic seascape character and terrestrial heritage assets

- 9.1 This review by LUC is based solely on desk-based appraisal of the methods employed, and the conclusions reached, by the Developer in relation to potential impacts on historic seascape character and terrestrial heritage assets. Due to the number of terrestrial assets within the Zone of Theoretical Visibility (ZTV), it is not possible to provide detailed conclusions on potential impacts experienced by individual assets. However, where potential inconsistencies or erroneous assessments are identified, these are highlighted accordingly.

Historic seascape character assessment

Study area

- 9.2 The selection of historic seascape units for assessment is based on a notional 50km buffer drawn around the original scheme boundary, which is broadly congruent with maximum theoretical visibility both on and offshore. We are content that this represents a proportionate response to the likely effects of the development.

References

- 9.3 Although the assessment makes use of existing Historic Seascape Characterisation (HSC) for English waters, no comparable information exists for Welsh seascapes. This is highlighted as an issue in the ES, with the Developer making use of published sources instead.
- 9.4 While this is a broadly reasonable approach, we consider that there may have been potential for the Developer to 'fill the gap' by applying the established English Heritage National Method Statement (Tapper, 2008; 2010) to the remainder of the study area within Welsh waters to ensure consistency in the assessment. However, we do not consider that such action would have resulted in substantive change to the assessment – and it is recognised that the HSC methodology has not been approved or adopted by Cadw or the Countryside Council for Wales (CCW).

Methodology

- 9.5 As no unified data source is available for Welsh historic seascapes, the Developer has focussed on available sources. These are stated to include evidence of historic patterns of navigation, the development of coastal recreation activities and specific information on cross-channel voyaging obtained from the Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW).
- 9.6 The baseline information is presented in a discursive, rather than a systematic or spatially-specific manner. While this potentially reflects the relatively sketchy information available, it significantly reduces the ability of the reader to understand the decision-making processes within the assessment. At a practical level, as no receptors are defined – and no assessment of their heritage significance is provided – the logic and process applied to determining sensitivity, magnitude of change and the significance of impacts is unclear.
- 9.7 In the absence of defined Historic Seascape Character units (per the English HSC studies), a more transparent and integrated approach may have been to make use of the pre-existing seascape character units described in Briggs and White (2009). This could also have facilitated more effective read-across with the outcomes of the Seascape and Landscape and Visual Impact Assessment (S/LVIA).
- 9.8 Beyond the discussion of potential data sources, in paragraphs 6.8 and A.66 of Volume 3, Annex 12.1, the nature, character and potential significance of Welsh seascapes is not expanded on to any meaningful extent. However, the ES does draw attention to the important cultural and

economic connections across the Bristol Channel that developed from prehistory onwards – although the extent to which this informs the assessment of sensitivity within Welsh waters is unclear.

- 9.9 Similarly, as the assessment of impacts on historic seascape character uses only the English HSC Types, there is little spatial detail in the assessment and no capacity to differentiate between impacts in Welsh or English waters, or in different areas of the same character type. No mapping is provided to indicate where the English HSC typology is held to apply in Welsh waters. While this is not an issue in relation to direct impacts on historic seascape character (as the majority of the proposed development lies within English waters), the contribution to wider historic character and the perception thereof are not always clear, making appreciation of any effects difficult.

Assessment of impacts on historic seascapes

- 9.10 It should be noted that the ES predicts no significant impacts on historic seascape character, which we consider to be potentially optimistic – although these will be largely confined to English waters.
- 9.11 Effects are considered in the context of the entire historic seascape character type, rather than acknowledging the potential for more severe localised effects. Although a relatively small proportion of the proposed development lies within Welsh waters, some additional spatial specificity would have been welcome in understanding the nature and extent of predicted impacts. Similarly, the ES frequently confuses impacts on *activities* and *use* of the sea with impacts on character – while often related, these factors are not necessarily the same, given the potential differences in perception that may arise.

Commentary

- 9.12 While we do not disagree with the *overall* significance of likely effects, we consider that the ES would have benefitted from a more detailed analysis of the contribution of seascape to the character and significance of terrestrial assets

Terrestrial heritage assets

Landward study area

- 9.13 The landward study area was selected using the same 50km buffer applied to the development boundary, and the maximum Zone of Theoretical Visibility.

References

- 9.14 The ES has been based on a comprehensive set of current guidelines, set out in paragraph 12.5 and in Volume 3, Annex 12.1, Appendix A (paragraph A.9). These are considered to be relevant and up-to-date and to be an appropriate basis for establishing a good practice approach to assessing impacts on terrestrial heritage assets, along with the additional references included in the chapter text.
- 9.15 We consider that the English Heritage publication '*Seeing History in the View: A method for assessing heritage significance within views*' (EH, 2011) could also have been a valuable addition.

Methodology

Evaluation of significance for the purposes of EIA

- 9.16 Schedule 4, Part 1.4 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2011⁴ states that "*a description of the likely significant effects of the development on the environment, which should cover the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects of the development*" should be included in Environmental Statements.
- 9.17 While it would be helpful for the ES to spell out the nature of the impact on heritage assets for the sake of completeness, the assumption that these are adverse is implicit.

⁴ <http://www.legislation.gov.uk/ukxi/2011/1824/schedule/4/made>

Sensitivity

- 9.18 No sensitivity criteria are provided in relation to terrestrial heritage assets; neither is this discussed in any detail in the summary assessments provided in Chapter 12, or in the Gazetteer in Volume 3, Appendix I.
- 9.19 It would have been helpful for this information to be provided, at least at the summary level, to give a better understanding of how the heritage significance of assets relates to, and could be affected by, the proposed development. This would give a more effective indication of the assets' sensitivity to the type of change likely to occur.
- 9.20 Assets are ascribed a 'value' in the Gazetteer, which can be broadly interpreted as relating to their sensitivity. Similarly, a brief discussion of assets' significance provides a little information on the role of setting in informing this (and potential sensitivity to the proposed development). However, the ES would have benefitted from a more transparent approach so that the reader could clearly follow the logic applied in decision-making.

Magnitude of change

- 9.21 No magnitude of change / impact information is provided in relation to heritage assets.
- 9.22 Coupled with the lack of clarity in terms of defining the sensitivity of assets, this results in a significant lack of transparency in the prediction of effects.

Effects on Landscapes of Special / Outstanding Historic Interest

- 9.23 Although the '*Guide to Good Practice on using the Register of Landscapes of Historic Interest in Wales in the Planning and Development Process*' is referenced, no indication is provided as to whether the ASIDOHL2 methodology was applied to assessing the likely impacts on the setting of the relevant Registered landscapes. While the majority of this assessment process would be irrelevant – given the lack of physical effects – this would have provided a transparent and best-practice approach to understanding the likely impacts.
- 9.24 We do not anticipate that this would substantially alter the predicted effects, but could have provided additional certainty for both the Developer and consultees.

Baseline

- 9.25 The ES follows a robust approach in identifying an appropriate baseline against which effects can be assessed. In line with the LVIA, the study area encompasses an area extending 50km from the boundary of the proposed development. Within this area, assets have been selected using the following criteria:
- Importance/value: designated heritage assets of higher importance/value including:
 - World Heritage Sites;
 - Scheduled Monuments;
 - Grade I and II* Listed Buildings;
 - Grade I and II* Registered Parks and Gardens of special historic interest
 - Registered Landscapes of Outstanding Historic Interest;
 - Registered Landscapes of Special Historic Interest; and/or,
 - A coastal or near coastal location, also a clear visual or functional connection with the sea.
- 9.26 In addition, statutory consultees were asked to provide information regarding any undesignated heritage assets considered to be sensitive to the proposed development. The ES indicates that no such heritage assets were identified.
- 9.27 The baseline as presented in the ES (in Volume 3, Chapter 7) is structured in broadly spatial terms, by country and local authority area. This is a logical and accessible structure, making it relatively easy for consultees to draw out key information for their area of interest (where applicable).

Assessment of impacts on terrestrial heritage assets

- 9.28 The assessment of impacts is presented in a similar spatially-driven structure to the baseline, providing summary text noting the level of impact, value of the asset and predicted effects.
- 9.29 It has not been possible to undertake independent verification of the outline statements of significance provided for each heritage asset, therefore only relatively general inferences can be made on the assessment outcomes. This section therefore concentrates on assets for which we have clear issues with the interpretation of significance, or the assessment of likely effects.

Scheduled Monuments

- 9.30 The promontory forts of the Pembrokeshire and the Gower coast represent the densest distribution of such sites in Wales, and are an important aspect of the historic character of the distinctive limestone coastline. Seven of these sites are assessed in the ES, all of which are subject to minor effects. Of the 56 Scheduled coastal promontory forts in Wales, 29 lie within 50km of the proposed development, with at least 19 having theoretical visibility of the scheme⁵ – including some of the finest examples of the class (such as Flimston Bay Camp and Greenala fort). While impacts on individual assets are relatively minor, as detailed in the ES, the potential effect on the class of monument as a whole is perhaps worthy of further consideration. Based on LUC's ZTV, a full third of this resource will experience some level of effects on setting as a result of the proposed development. This could be held to represent a more significant overall impact, as the relationship of these sites to uninterrupted sea views is a key part of appreciating their liminal position and intended (interpreted) functions.
- 9.31 The presence of the proposed development will not affect any recognised or hypothetical relationships between these assets and landscape features or other heritage assets and should not, therefore, result in unsustainable impacts on their heritage significance. It will, however, render the settings of these sites more vulnerable to synergistic impacts from future development – and may call attention to the level of priority given to protecting the remainder of the resource with unaffected vistas.
- 9.32 St. Govan's chapel is assessed as experiencing moderate impacts. While this is considered to be a reasonable assessment based on the available information, it may have been beneficial to provide photomontage, or at minimum wireline, visualisations of the proposed development from the asset itself. The photomontage from Viewpoint 2 (St. Govan's Head) is located well above the chapel site and, in contrast to the asset, has extensive vistas. As the chapel is set within a cleft in the cliff, and has tightly framed views out across the Bristol Channel, this is not considered to provide an effective representation of visual effects.
- 9.33 The supplementary photography provided for VP2b may have been more appropriate in providing an accurate impression of visual effects on the asset (although again, the photographs are not actually taken from the chapel). Given the very deliberate isolation of this eremitic site – and the intimate functional and symbolic relationship of the asset with the sea (along with traditional tales of St. Govan) – the effect on its significance may require revision. It is acknowledged that the proposed Development will be at a considerable distance, which will reduce the overall level of impact, but we consider that a precautionary approach is advisable in this instance.
It is recommended that an additional visualisation is produced by the Developer to confirm – or revise – the assessment.
- 9.34 We would concur with the assessment of impacts on other Scheduled Monuments.

Landscapes of Special or Outstanding Historic Interest in Wales

- 9.35 In general, we would concur with the assessment of effects on the following historic landscapes:
- Stackpole Warren landscape of special historical interest: **minor effects**
 - Manorbier landscape of special historical interest: **minor effects**
 - Taf and Tywi landscape of outstanding historical interest: **minor effects**
 - The Gower landscape of outstanding historical interest: **moderate effects**

⁵ Based on ZTV created by LUC

- Margam Mountain landscape of special historical interest: **minor effects**
- Merthyr Mawr, Kenfig and Margam Burrows landscape of outstanding historical interest: **minor effects**

- 9.36 The presence of the development would affect the setting of each of these historic landscapes but, with the exception of The Gower, should not generate significant effects on their attendant assets and significance, as defined in the Register. We are of the opinion that the ES would have benefitted from a more detailed explanation of the special qualities of these landscapes, and the potential – or otherwise – of the development to generate adverse impacts on these features. Overall, there is perhaps too strong a reliance on the distance of the development from receptors as the key factor in reducing the magnitude of impacts. The ES may have benefitted from a more explicit grounding of the assessment outcomes in the character and significance of these landscapes.
- 9.37 The Gower, specifically the Rhossili Cefn Bryn areas, is particularly rich in archaeological remains, including a number of promontory forts and earlier prehistoric ritual and funerary monuments that incorporate views of the open sea within their settings. While we would not disagree with the assessment of moderate effects on the historic landscape, we believe that this should be more strongly related to the heritage significance of the area – as the description in the ES is very similar to other landscapes experiencing lesser effects. The Gower is the closest of the historic landscapes, and it is assumed that this relative proximity (c. 22km) is the reason for a higher level of impact.

Implications for the National Park

Caldey Island

- 9.38 It should be noted that, due to the revision of the scheme from 417 to 278 turbines, the extent of the Array in views from the island has been substantially reduced – from around 75° to 37°. This is likely to significantly reduce the prominence of the Development within views from the island. However, photomontages were not provided for Viewpoint 9 in the ES, therefore the precise effect on the view is unclear, particularly in relation to visual interactions with Lundy and the Devon coast.
- 9.39 The presence of the proposed development in views from Caldey may change the perception of relative remoteness and a sense of ‘wildness’ that is potentially important to understanding and appreciating the early Christian heritage of the island. While no proven link between the early monastic communities on Caldey and Lundy has been established, the shared tradition of establishing religious houses in liminal locations provides an obvious link. This sense of isolation will potentially be reduced – although by no means wholly lost – through the presence of the Array in views to the south and southeast.
- 9.40 Views from the Mesolithic sites in the east of the island (Nanna’s Cave, Potter’s Cave and Daylight Rock) are primarily focussed by topography toward the Welsh coastline and will therefore be less affected⁶.

Landscapes of Special Historic Interest

- 9.41 The heritage significance of the Stackpole Warren and Manorbier LSHIs is not generally reliant on uninterrupted sea views and will not therefore experience significant adverse effects as a result of the proposed development. Similarly, the ability of viewers to understand and appreciate this significance, and the time-depth in the landscape, will not be impaired. It could be argued that the wider context of the historic landscapes, particularly the relatively intact medieval field systems of Manorbier, may lose some of their timeless quality through the introduction of the development to a formerly ‘blank’ backcloth provided by the sea. However, in real terms the distances from the Array are such that this effect will be frequently be limited.

⁶ Although it should be noted that this inference is not based on field investigation of the aforementioned sites

Designated assets

- 9.42 The potential effects on the region's promontory forts is potentially worthy of further consideration, particularly with regard to decision-making relating to future developments affecting their setting.
- 9.43 While it is unlikely that effects on St. Govan's chapel will ultimately be of more than moderate significance, we consider the lack of appropriate visualisations from this asset is an omission which should be addressed.

10 Conclusions

A case for the National Park

- 10.1 This final section provides a summary and overall conclusion on the scheme in relation to seascape, landscape and visual resources, historic seascape character and terrestrial heritage assets.
- 10.2 The draft ES indicates the proposed Atlantic Array offshore wind farm is predicted to have significant effects on PCNP as follows:
- Significant impact on views at Caldey Island (View 9) and St. Govan's Head (View 2);
 - Significant sequential impacts – on recreational uses on the Pembrokeshire Coast National Trail.
- 10.3 This review of the draft ES considers that there have been some underestimates of predicted effects on the National Park, notably in relation to visual impacts.

The draft ES method and approach – key points

- 10.4 The draft ES, generally, follows good practice guidance and the method and associated visualisations are appropriate for the purpose. However, we consider that in cases the ES method may lead to an underestimation of impacts. Our concerns are noted here with reference to key omissions/underestimates in the ES.

Sensitivity

- 10.5 The approach for defining seascape/landscape sensitivity is generic and not targeted to the particular development proposed by the Atlantic Array scheme or the character of the specific landscape resource. For this reason we consider that this approach means that there is likelihood that sensitivity is underestimated. A simpler 3 point scale would also be more practical and avoid the need for very detailed decisions on the differences between an 'extremely sensitive' or 'particularly sensitive' landscape/seascape which are very difficult to justify in the assessment process. For landscape and visual, the approach adopted makes it difficult to calibrate results (difference between 'Very High' and 'High') across an area. For visual sensitivity, this is a particular concern as one viewpoint (St. Govan's Head) is singled out as being of 'Very High' sensitivity but the basis for this is unknown. There is no reason why a similar level of sensitivity should not also be given to all the other viewpoints which are National Park, National Trail and, frequently, National Trust land. The valued wild, remote character of views from this coast are highly sensitive.

Landscape baseline

- 10.6 For a scheme of this size and scale a proportionate landscape baseline is essential to avoid an unnecessarily complex approach. Overall, the baseline landscape character information for Wales is complicated. The reliance on using the detailed LANDMAP data covering all five aspect layers risks losing the bigger picture among the *minutiae* of detail held on LANDMAP. We consider a strategic level of assessment in published LCAs (such as the PCNP LCA) or using the Wales regional LCAs could have been a more helpful starting point, although we are aware that the LANDMAP approach may have been required by CCW.

Recognising designated landscapes

- 10.7 In the SLVIA (ch.12), the special qualities of the Pembrokeshire Coast National Park are identified with an associated assessment of effects (Table 12.18). However, there is no formal assessment of their sensitivity or the magnitude of change, and no significant changes to special qualities are predicted either for the construction or operational phase of the Atlantic Array. A summary of

operational effects on the National Park is also contained in Vol 3, Annex 12.2, Appendix G Operational Phase – Designated/Defined Landscape Effects, although this, similarly, does not refer to special qualities and so it is not entirely clear how this judgement is made. We consider that more attention should have been paid to the impact on special qualities of the PCNP.

Conclusion

- 10.8 The site visit concluded that significant effects will be experienced from Pembrokeshire Coast National Park, contrary to the conclusions of the LVIA in the draft ES. Separation distance from the scheme (at least 27km) means that these are not substantial impacts. Nevertheless major impacts are predicted at key viewpoints along the coast, forming part of the Pembrokeshire Coast Path National Trail, and these will be experienced sequentially by receptors walking this path. Almost the entire coastline of this southern section of the National Park will have a view to the scheme, in what is currently uninterrupted, undeveloped seascape, with the Array often being seen in combination with Caldey and with Lundy as a backdrop. In many views the Array will be a distinct, albeit distant, focus. In certain weather conditions when visibility is good there will be no escaping from the scheme in views along any part of the coast in this part of the National Park. The beaches, many of which are orientated towards the scheme, and the wild remote cliff tops will also experience a significant effect on their character.