
Penderfyniad ar yr Apêl

Ymchwiliad a gynhaliwyd ar 10-13/11/15 & 1-2/12/15

Ymweliad â safle a wnaed ar 9/12/15

gan Alwyn B Nixon BSc(Hons) MRTPI

Arolygydd a benodir gan Weinidogion Cymru

Dyddiad : 04 Chwefror 2016

Appeal Decision

Inquiry held on 10-13/11/15 & 1-2/12/15

Site visit made on 9/12/15

by Alwyn B Nixon BSc(Hons) MRTPI

an Inspector appointed by the Welsh Ministers

Date : 04 February 2016

Appeal Ref: APP/N6845/A/15/3025045

Site address: Land South of Valero and East of Rhoscrowther, Refinery Road, Hundleton, Pembroke, Pembrokeshire

The Welsh Ministers have transferred the authority to decide this appeal to me as the appointed Inspector.

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Rhoscrowther Windfarm Limited against the decision of Pembrokeshire County Council.
 - The application Ref 13/0876/PA, dated 15 January 2014, was refused by notice dated 21 January 2015.
 - The development proposed is to construct and operate 5 wind turbines with a maximum tip height of 100m together with ancillary development comprising substation, control building, new and upgraded access points, access tracks, hardstanding and temporary construction compound and associated works.
-

Decision

1. The appeal is dismissed.

Preliminary and procedural matters

2. I heard evidence over a total of six days between 10 November and 2 December 2015. On 9 December I carried out an accompanied inspection of the site and surrounding locations including representative viewpoints and the sites of various heritage assets. I also visited the site and associated locations and viewed the site from various vantage points, including more distant representative viewpoints, on an unaccompanied basis on 9 December and at other times during and after the Inquiry.
 3. The application to the Council was a fully detailed application. There were minor amendments before it was determined by the Council. My consideration of the appeal is based on the same drawings as those before the Council at the time of its decision, namely:
 - 1.1a Site Location Plan (Revision A)
 - 002 Revision A Site Layout
 - 003 Watercourse Crossing
 - V1 Control Room
-

GCS0019-2 Revision 1 Sub-Station

4. The application was accompanied by an Environmental Statement (ES) and a subsequent addendum. Further technical material was submitted and scrutinised during the course of the Inquiry. I have taken all of the environmental information in the ES and the further supporting technical and other information into account in arriving at my decision.
5. The Pembrokeshire Branch of the Campaign for the Protection of Rural Wales (CPRW) appeared at the Inquiry to oppose the proposal and were accorded Rule 6 party status in the proceedings.
6. The Council's second reason for refusal, relating to archaeology, is no longer pursued following submission of an Archaeological Evaluation Report and agreement of acceptable mitigation.
7. Discussion of what conditions would be necessary if the appeal was successful and the development was to proceed took place during the Inquiry. Following that discussion I allowed a period of 14 days after the close of the Inquiry for further dialogue between the main parties on the outstanding matters concerning the detailed wording of certain conditions. The Council's finalised schedule of suggested conditions and comments from the Appellant and CPRW were duly submitted and are appended to the list of Inquiry documents.

Main issues

8. The main issues are: first, the landscape and visual effects of the proposed development, having particular regard to its effect on the nearby Pembrokeshire Coast National Park; second, its effect on the settings of heritage assets in the area; and third, whether any resulting harm in terms of these or other matters is outweighed by the benefits of the proposal, including its contribution to energy generation from renewable sources and combating the effects of climate change.

The proposed development

9. The site lies to the south of the Milford Haven Waterway, about 8km/5 miles west of Pembroke. The site is within countryside characterised by undulating farmland, dotted with farmsteads and occasional buildings sited alone or grouped in small clusters. Close by to the north is the Valero oil refinery, a large scale industrial feature that contrasts starkly with its rural setting. The site is close to the boundary of the Pembrokeshire Coast National Park, which runs roughly north-south just to the west of the site, encompassing the margins of Angle Bay and continuing south and east to include the Angle Peninsula and the area of Freshwater West.
10. The appeal scheme comprises a cluster of 5 wind turbines of height 100m to blade tip and 41m rotor radius which would be located on enclosed agricultural land associated with the former farmstead of Cheveralton, just east of the hamlet of Rhoscrowther. Each turbine would have a maximum capacity of 2.5MW, giving the scheme a potential installed capacity of 12.5MW. The turbines would mainly be located on the south facing slope of a shallow valley descending westwards past Rhoscrowther to Angle Bay. Turbines 1 and 2 would be located towards the top of the slope, with their bases at an elevation of about 55m AOD; turbines 3 and 5 would be slightly lower, with their bases set at around 45m and 35m AOD respectively, whilst turbine 4 would be at around 32m AOD and on the south side of the stream within the valley.

11. The farmland rises to a gentle crest at about 63m AOD, along which runs an improved minor road which separates the appeal site from the Valero refinery and leads to Rhoscrowther. Access to the turbine locations would be via two new tracks leading from the minor road; the control building and substation would be close to the western site entrance, with the latter connecting to the grid at this point.

Policy context

12. The development plan for the area including the appeal site is the Pembrokeshire County Council Local Development Plan (LDP), adopted in 2013. It contains a number of broad strategic (SP) policies. Policy SP 1 Sustainable Development relates to the overarching objective of the LDP to deliver sustainable development, and requires that development proposals demonstrate how positive economic, social and environmental impacts will be achieved and adverse impacts minimised.
13. Policy SP 16 The Countryside seeks to support the social and economic needs of those who live and work in the countryside whilst protecting the landscape and natural and built environment of Pembrokeshire and adjoining areas. It makes provision for certain types of rural development, although these are not relevant to this proposal. Policy SP 2 Port and Energy Related Development supports port related facilities and infrastructure, including energy related development, at the Port of Milford Haven. The site lies outside the SP 2 policy area, as shown on the LDP Proposals Map. The site lies within the boundary of the Haven Waterway Enterprise Zone, designated by the Welsh Government and focused on the sustainable growth of the energy sector, both in renewable energy technologies and traditional hydrocarbons. However, this is not a planning policy designation.
14. The General (GN) policies of the LDP cover a range of detailed matters. GN.1 General Development Policy requires development proposals to satisfy a number of criteria. Criterion 1 requires that the nature, location, siting and scale of the development is compatible with the capacity and character of the site and the area within which it is located. Criterion 2 requires that there be no significant detrimental impact on local amenity in terms of, amongst other things, visual amenity. Criterion 3 requires that the development would not adversely affect landscape character, quality or diversity, including the special qualities of the Pembrokeshire Coast National Park.
15. Policy GN.4 Resource Efficiency and Renewable and Low-carbon Energy Proposals confirms that developments which enable the supply of renewable energy through environmentally acceptable solutions will be supported. GN.38 Protection and Enhancement of the Historic Environment states that development that affects sites and landscapes of architectural and/or historical merit, or their setting, will only be permitted where it can be demonstrated that it would protect or enhance their character and integrity.
16. As set out above, the appeal site is close to the boundary of the Pembrokeshire Coast National Park. The National Park area has its own Local Development Plan, adopted in 2010. The National Park LDP sets out the statutory purposes of National Parks, namely to conserve and enhance their natural beauty, wildlife and cultural heritage and to promote opportunities for public understanding and enjoyment of their special qualities. In pursuing these purposes the National Park LDP seeks to conserve, enhance and promote the historic environment of the National Park (policies 8, 13 and 14) and to conserve and enhance its special landscape character (policies 8 and 15). It also recognises the need to combat climate change by

improving energy conservation and efficiency and contributing to national targets for renewable energy (policy 33).

17. National Park LDP Policy 33 Renewable Energy indicates potential for small scale (10kW-50kW) wind energy proposals within the National Park, and to a lesser degree medium scale proposals (50kW-330kW). It also notes that there are extremely limited opportunities for larger scale proposals ($\geq 330\text{kW}$ -3MW). This potential is expanded upon in the National Park Authority's Renewable Energy Supplementary Planning Guidance (SPG) (adopted 2011, updated 2012 and 2014). Annex 2 of the SPG summarises landscape sensitivity to wind energy development for each Landscape Character Area (LCA) within the National Park (excluding urban areas) and provides guidance as to potential for such development. The overall assessments for LCA6 (Castlemartin/ Merrion Ranges) and LCA7 (Angle Peninsula) record a high landscape sensitivity to siting of medium (25m-65m height to blade tip) or large (65m-125m) turbines, and state that the majority of these LCAs are unsuitable for such development. However, the Annex also notes that "there may, however, be limited opportunity for a single or a small cluster of medium or large (under 100m to blade tip) scale turbines on land close to existing oil refinery chimneys to provide a new point of focus as long as they are sited sensitively following the guidance below" (detailed guidance follows). Annex 2 also notes that where the assessments make reference to "small clusters" of wind turbines, these comprise groups of 2-3 turbines.
18. UK energy policy is shaped by international protocols aimed at tackling climate change and European energy policy. The 1997 Kyoto Protocol set targets for a reduction in greenhouse gas emissions for most developed countries. In terms of renewable energy European Commission Directive 2009/28/EC requires member states to meet mandatory renewable energy targets consistent with an EC-wide renewable energy share of 20% by 2020. The UK must achieve a target of 15% of energy produced from renewable sources by 2020.
19. The National Infrastructure Plan (2014) provides further targeted objectives to reduce carbon emissions in order to mitigate climate change and meet legally-binding UK targets. The UK's overarching National Policy Statement for Energy (EN-1) (July 2011) sets out national policy for energy infrastructure. It states that the UK is committed to meeting its legally binding target, via successive five-year carbon budgets also set in law, to cut greenhouse gas emissions by at least 80% compared to 1990 levels by 2050, and that this cannot be achieved without significant amounts of new large-scale energy infrastructure. The interim 2020 target is a 30% emissions reduction.
20. EN-1 is directed at Nationally Significant Infrastructure Projects (NSIPs)¹. However, the policy objectives concerning the need to deliver renewable energy capacity are also relevant to the consideration of smaller-scale schemes. EN-1 indicates that substantial weight should be given to the consideration of need, but that such weight should be proportionate to the anticipated extent of a development's contribution towards satisfying that need. EN-3 Renewable Energy deals specifically with matters concerning renewable energy NSIPs.
21. In Wales, the thrust of national planning policy relating to energy development derives from the foregoing climate change and carbon emission reduction objectives

¹ For onshore wind proposals in Wales, currently schemes of 50MW or more generating capacity

and is underpinned by the Welsh Government's Energy Policy Statement Energy Wales: A Low Carbon Transition (2012). The policy is primarily contained within Planning Policy Wales (PPW) and Technical Advice Note 8 Planning for Renewable Energy (TAN 8). PPW states that planning decisions should "support the need to tackle the causes of climate change by moving towards a low carbon economy. This includes facilitating development that reduces emissions of greenhouse gases in a sustainable manner, provides for renewable and low carbon energy sources at all scales and facilitates low and zero carbon developments".

22. PPW states that local planning authorities should:

- Consider the contribution that their area can make towards developing and facilitating renewable and low carbon energy and ensuring that development plan policies enable this contribution to be delivered;
- Ensure that development management decisions are consistent with national and international climate change obligations, including contributions to renewable energy targets and aspirations;
- Recognise the environmental, economic and social opportunities that the use of renewable energy resources can make to planning for sustainability².

At the same time, local planning authorities should:

- Ensure that international and national statutory obligations to protect designated areas, species and habitats and the historic environment are observed³.

23. PPW notes that: "In the short to medium term, wind energy continues to offer the greatest potential (for activities within the control of the planning system in Wales) for delivering renewable energy. Wales has an abundant wind resource and power generation using this resource remains the most commercially viable form of renewable energy. The Welsh Government accepts that the introduction of new, often very large structures for onshore wind needs careful consideration to avoid and where possible minimise their impact. However, the need for wind energy is a key part of meeting the Welsh Government's vision for future renewable electricity production as set out in the Energy Policy Statement (2010) and should be taken into account by decision makers when determining such applications"⁴.

24. The Minister for National Resources "Dear Chief Planning Officer" letter issued on 14 August 2015 confirmed the Welsh Government's vision for future energy generation based on embracing Wales' abundant renewable energy resources, and its view that onshore wind is currently the most commercially mature form of renewable energy. Despite recent announcements in England concerning onshore wind, the Welsh Government continues to see renewable energy as a key element in ensuring that Wales achieves sustainable development for future generations.

25. PPW identifies a range of matters that local planning authorities should take into account in determining applications for renewable energy development, including the

² PPW Para 12.8.9

³ PPW Para 12.8.10

⁴ PPW Para 12.8.12

contribution a proposal would make to meeting identified targets and potential for renewable energy and cutting greenhouse emissions; the wider environmental, social and economic benefits and opportunities; the impact on the natural heritage, coast and historic environment⁵. In National Parks, development management decisions should give great weight to conserving and enhancing their natural beauty, wildlife and cultural heritage. The duty to have regard to National Park purposes applies to activities affecting these areas, whether or not those activities lie within or outside the designated areas⁶. PPW also makes reference to the need to consider the impacts of development proposals on a range of historic heritage assets, including listed buildings, scheduled ancient monuments, conservation areas, landscapes parks and gardens of special historic interest, and the respective settings of such features.

26. TAN 8 provides a spatial dimension to the consideration of onshore wind energy schemes in Wales, identifying 7 Strategic Search Areas where large scale (over 25MW) schemes should be concentrated. For smaller schemes, TAN 8 states that local planning authorities are best placed to assess detailed locational requirements within and outside SSAs in the light of local circumstances⁷. The appeal site is neither within, nor close to, a SSA. TAN 8 indicates that there is a balance to be struck between the desirability of renewable energy and landscape protection⁸. There is an implicit objective in TAN 8 to maintain the integrity and quality of the landscape within the National Parks, i.e. no change in landscape character from wind turbine development. In the rest of Wales outside SSAs, the implicit objective is to maintain the landscape character, i.e. no significant change⁹.

Landscape and visual effects

27. The site lies just outside the boundary of the Pembrokeshire Coast National Park, a statutorily designated landscape. Planning Policy Wales states that the duty to have regard to the statutory purposes of National Parks applies to activities affecting those areas, whether those activities lie within or outside the designated area.
28. A landscape and visual impact assessment (LVIA) was included in the ES. This followed the methodological guidelines established by GLVIA3 and also drew on other sources of best practice. The initial LVIA was subsequently supplemented, at the Council's request, by further assessment work in relation to locations on the north side of the Haven at St Ann's Head, Dale and Great Castle Bay. The landscape assessment considered the potential for effects on a range of landscape receptors, including landscape designations, LANDMAP aspect areas, Pembrokeshire Coast National Park Landscape Character Areas and draft Seascape Character Areas. The visual impact assessment incorporated assessment based on photomontages and wireframes at a range of illustrative, representative and specific viewpoints and zone of theoretical visibility (ZTV) analysis. It also included consideration of visual effects on residential amenity and cumulative visual impacts. The Council considers the assessment to have been soundly based as regards its broad methodology and

⁵ PPW Para 12.10.1

⁶ PPW Paras 5.3.6-7

⁷ TAN 8 Para 2.3

⁸ TAN 8 Para 2.13

⁹ TAN 8 Annex D para 8.4

scope, and I find no reason to disagree. However, the Council and CPRW (Pembrokeshire) disagree with a number of the conclusions reached concerning the extent and significance of the effects identified.

29. The site is part of a largely open and rural agricultural landscape, dotted with individual habitations and small clusters of development, extending westwards from Pembroke to the Angle Peninsula. The uncluttered, open character landscape of the peninsula is accentuated by the elevated nature of the principal routes traversing this area. Also notable is the sense of increasing wildness and remoteness further to the south and south-west of the appeal site, within the National Park boundary and towards the coastline around Freshwater West. Nearby to the west, and within the National Park, lie Angle Bay, the village of Angle itself and the headland behind Angle Point, which are traversed by the Pembrokeshire Coast Path and Wales Coast Path National Trails.
30. Contrasting with this, the appeal site is also located close to the considerable presence of the Valero refinery. Further to the north and east, and lining the south and north sides of the Haven Waterway, lie the port and jetty facilities, other elements of energy related infrastructure including wind turbines on the north side of the water, and areas of urban settlement. For the appellant it is argued that the visual effects and effects on landscape character are heavily mitigated by the presence of Valero and the other industrial and energy-related developments in the area, which form part of the baseline conditions against which the appeal proposal falls to be considered.
31. The evidence on the landscape and visual impacts of the development focusses strongly on the visual impacts and the effects on the visual and sensory aspects of landscape character. I deal with effects on the historic aspects of the landscape in the subsequent section on heritage assets. The site itself lies outside, but close to, the boundary of the National Park; the turbines would variously be located between about 500m and a little over 1km from the Park boundary at its nearest point. The Park boundary, which was amended here in 1995 to reflect the development of the Valero site, encompasses the margins of Angle Bay west of the appeal site and the coastal environs of the Angle Peninsula and Freshwater West to the south-west and south.
32. The appeal site lies within the north-western part of the extensive LANDMAP Visual and Sensory Aspect Area PMBRKVS061, characterised as Mosaic Rolling Lowland and having an overall evaluation of Moderate. This aspect area extends into the National Park, where the LANDMAP Visual and Sensory classification is replaced further west by more localised areas variously characterised as Open Rolling Lowland, Dunes and Dune Slack, Intertidal and Cliffs and Cliff Tops, with overall evaluations ranging from Moderate through High to Outstanding. Immediately to the north of the appeal site the Valero complex is identified as PMBRKVS090, characterised as Urban with an overall evaluation of Low. To my mind this broadly reflects the landscape context of the appeal site as occupying part of a rolling mosaic of countryside which permeates into the National Park and forms a rural buffer between the Park and the urbanised elements of Milford Haven and associated settlements. North of the appeal site, however, the rural buffer is interrupted by the Valero complex.
33. It is not in dispute that the turbines would significantly impact on landscape character at ranges of up to 2km from the site; this is unsurprising, given that the scheme comprises five 100m high turbines. At viewpoint 1 (Bridleway north of Hoplass) the distance to each turbine location varies from around 300m to about

1km and the five turbines would be spread across and dominate the field of view. As demonstrated by the photomontages at viewpoints 4, 5 and 6 (distances to nearest turbine roughly 1.5km), the turbines would appear as very prominent large objects spread across a substantial part of the field of view.

34. It is true that a large area to the north of the site is occupied by industrial development (Valero). The imposing presence of the Valero refinery close to the site cannot be ignored. The collection of tall towers, stacks and chimneys makes for a striking feature which is visible from many points for miles around – not least from many locations within the National Park including many parts of the Coast Path national trail as it makes its way towards Freshwater West, skirts the Angle peninsula and Angle Bay, and later follows the north side of the Haven in the area around Dale and beyond. The refinery's industrial character contrasts dramatically with its essentially open and rural setting. That said, in these wider views from within the National Park it is the skyline cluster of taller elements which attracts the eye. These are concentrated within a relatively small part of the developed refinery area. Much of the rest is hidden by the landform in these views.
35. The land comprising the former BP tank farm at the eastern end of Angle Bay is no longer industrial in character. This land has no remaining industrial use and is being actively returned to a natural state. The recently-installed solar panel arrays at Hoplass and Wogaston are low-profile energy installations which have not fundamentally altered the rural character of the landscape. The physical characteristics of these solar developments and their influence on the character and appearance of the area are very different to those of the wind turbine development now under consideration. The effect of these schemes on the area is largely localised, and has not significantly altered the landscape context against which the appeal proposal falls to be assessed.
36. Other industrial or urban features mentioned, such as the new Pembroke power station, port facilities and energy related infrastructure, are essentially concentrated along the north and south sides of the Haven, focussed on and looking towards the waterway. They do not to my mind occupy the same landscape context as the appeal site, which looks and relates more closely to the rural sweep of land within the National Park running out to the coast and the mouth of the Haven beyond Angle Bay. Reference is made to LDP policy SP 2, which provides support for port related facilities and infrastructure, including energy related development, at the Port of Milford Haven. However, the appeal site does not lie within the area to which policy SP 2 applies, nor is any functional relationship with the port claimed. Although the site is close to the boundary of Valero, it clearly lies within the countryside and is subject to policy SP 16. Whilst the site is within the bounds of the area identified as the Haven Waterway Enterprise Zone, this is not a planning policy designation. There is no identified linkage between the proposal and the Enterprise Zone initiative.
37. Whilst the turbines at Wear Point and others to the north of the Haven Waterway are established features in the landscape, they are confined to the north side and separated from the appeal site and its environs by the Green Hill ridge line and the waterway itself. To the extent that they are visible in views of the appeal site they appear as minor background elements within a different landscape context. The new Pembroke power station and associated power line pylons occupy a very different landscape context, being situated on the northern side of the Rhoscrowther – Green Hill ridgeline and close to the Haven Waterway. The mast at Green Hill is a minor element of the landscape.

38. The Valero refinery is a major industrial feature and part of the baseline conditions against which the wind farm scheme must be assessed. However, its impact and prominence in the wider landscape derives mainly from a comparatively tight concentration of vertical elements that form an isolated skyline composition in stark contrast to its pastoral surroundings and the natural beauty of the National Park. When allowed, despite its location impinging on the Park, it was no doubt considered justified due to the overriding arguments in the national economic interest and the exceptional deep water harbour facilities which determined the refinery's location. Seen from within the National Park it comprises a striking counterpoint to the rural character of the landscape, marking the presence of the Haven Waterway activities beyond.
39. The proposed turbines would introduce an array of prominent and large-scale man-made structures into the narrow wedge of pastoral landscape between the Valero refinery and the National Park. Due to the number and height of the turbines and the diameter spread of the moving blades the wind farm would be a prominent and distracting feature in the landscape. I do not consider that the visual characteristics of the proposed development would have a complementary or consolidating relationship with the static and more tightly grouped composition of the Valero stacks, towers and chimneys. Rather, the development would compound the present level of visual intrusion and spread the influence of development across a significantly greater area, whilst confusing the presently simple contrast between the refinery and its rural setting as seen from the south.
40. From the B4320 route to and from Angle and Freshwater West through the Park (illustrated by viewpoint 5 near National Trust land at Kilpaison Burrows, 1.4km from the nearest turbine) the turbines would appear as a very prominent array across a substantial part of the field of view. They would form a visually separate and distinct element from the Valero complex, occupying a part of the view which is essentially pastoral, notwithstanding the more distant minor elements of the power station chimneys, the Wear Point turbines and outlying parts of the refinery site. The presence of the turbines would be accentuated by the rotation of their blades. The development would markedly increase the presence of man-made, industrial-scale elements in the landscape, spreading such visual influences significantly further across the scene and towards the Park.
41. Further to the south, the turbines would again be prominent in views from the elevated road leading from Castlemartin to Freshwater West, over a distance of almost 2km from West Farm (viewpoint 7, distance to nearest turbine 3.1km) to around Gupton Farm. This stretch of minor road also serves as the Pembrokeshire Coast Path and Wales Coast Path here. The vista of open countryside to the north is essentially unbroken save for the skyline feature of Valero at present. The five turbines would appear linearly spaced across the horizon to the east of Valero, their rotating blades projecting above the intervening ridge of farmland. They would appear as a substantial additional intrusion of very large man-made structures into the pastoral landscape. Depending on the viewer's position they would appear either as a substantial addition to Valero or as a distinct and separate visual element in the landscape. In either case the proposal would significantly increase and extend the envelope of development away from the Valero complex overlooking the Haven waterway and into the countryside bounding the National Park.
42. For the appellant it is argued that views of the site from these areas are less significant, being away from the coast and looking out of the National Park. However,

it seems to me that many of the users of these routes will be recreational users (whether visitor or resident), either going to or from a specific recreational destination, following the Coast Path National Trail or simply enjoying the locality on foot, bicycle or horseback. Such users are likely to have a heightened awareness and appreciation of these views, given the special quality of the landscape as recognised by the National Park designation. The elevated nature of these routes imparts a particular significance to the broad open vistas obtained from them. I thus do not agree that the significance of views in this area is confined to those towards the coast or to the areas of the Park itself having wilder and more remote qualities.

43. From the shoreline of Angle Bay to the west (illustrated by viewpoints 9 (the Old Point House, 3.9km from the nearest turbine) 11 (east of St Mary's Church, 4.4km) and 3 (Coastal Path west of Rhoscrowther, 1.3km)) the appeal proposal would variously appear as a prominent or very prominent skyline array, standing separately to the south of Valero and introducing a substantial new industrial-scale element into the backdrop to the bay. My own observations confirmed that the turbines would be present in views across the bay from much of the Pembrokeshire Coast Path/Wales Coast Path as it descends towards Angle Point and then traverses the western and southern sides of the bay. I consider that this would be harmful to views from the national trail and to the setting of Angle Bay generally.
44. The environs of Angle and Angle Bay are well-visited, and no doubt a source of enjoyment for visitors and residents alike. In addition to the prominent impact of the turbines from substantial stretches of the Wales/Pembrokeshire Coast Path in this area, the Old Point House (viewpoint 9) is a popular recreational destination. Whilst I accept that the turbines would not be evident from the confines of the main village street, I consider that there would be major to moderate/major effects on these views within this part of the National Park.
45. From viewpoint 4 (Bridleway, south of Wogaston, distance to nearest turbine 1.3km) the turbines would be seen largely directly against the Valero site. Other industrial and energy-related features of the Milford Haven waterway, whilst further away, are also evident, imparting a more industrialised character to the scene. The view is from a location outside the National Park and does not include parts of the Park within its compass, save for a small peripheral view to Angle Point and the Dale Peninsula beyond. Notwithstanding that the turbines would be very prominent in this view, given their relatively close proximity, I agree with the appellant's assessment that the impact here would be substantial/moderate, not major as assessed by the Council and CPRW.
46. From viewpoint 6 (near Wallaston Green, distance to nearest turbine 1.5km), the view is more polarised between the pastoral farmland falling westwards towards Angle Bay and the Angle Peninsula in the National Park and the prominent skyline industrial feature of Valero. The turbines would be very prominent in this scene. The impact of turbines 1-3 would be ameliorated as the tall Valero structures would be directly behind them; however, turbines 4 and 5 would encroach on the vista towards the Angle Peninsula, extending the visual impact of the structures towards the National Park. For this reason I agree here with the Council's visual impact assessment of major. Moreover, further north in the area of Green Hill (additional CPRW viewpoint), the visual separation of the turbines from Valero would increase and they would impinge on views of Angle Bay and the Angle Peninsula within the National Park to a greater extent.

47. North of this the landform descends from the ridgeline towards Pwllcrochan and the Haven waterway. As photomontage viewpoint 2 (entrance to Pembroke Power Station, Pwllcrochan, distance to nearest turbine 1km) illustrates, the upper parts of the turbines would be visible above the ridgeline but would be perceived within a context dominated by the Valero site. The wider landscape context of the National Park beyond would not be evident. Although the Pembrokeshire Coast Path/Wales Coast Path Trail passes through this area, it hereabouts encounters at close quarters the refinery complex, the fuel jetties of the waterway, and the new power station. The settlement, port and industrial areas of the Haven and the turbines at Wear Point are part of the wider landscape context. Taking these factors into account, I find that the visual and landscape effects in this area would be moderate.
48. From areas further east I consider that the impact of the turbines would be moderate or less. From around Pennar Park (viewpoint 10; distance to nearest turbine 3.9km) the turbines would be seen at a distance and in the context of Valero and the power station, in a landscape heavily influenced by these features and other skyline features such as pylons or masts. As illustrated by photomontage viewpoint 12 (Hundleton community sports field; distance to nearest turbine 4.5km), the effect of the turbines on areas of settlement in this direction would not be significant; viewpoint 13 (St Twynells, distance to nearest turbine 5.1km) indicates the same in relation to areas of ridgeline settlement to the south-east.
49. I do not regard the proposal as having any significant impact in relation to views from urban areas along the Milford Haven estuary. Although the Council's landscape witness drew attention to the view of the turbines that would be obtained from Pembroke Castle (viewpoint 14; distance to nearest turbine 6.6km), I do not consider that there would be material harm in these terms. The turbines would be distant objects and seen within a view already substantially characterised by Valero and the double row of high voltage pylons leading from the power station. Whilst the view along the Haven Waterway from the Cleddau Bridge is significant and impressive (viewpoint 15, distance to nearest turbine 6.6km), the proposed turbines would simply appear as one minor feature in an already-complex scene with industrial, port, energy production, settlement and waterway related activity. The addition of this new element would not cause significant harm.
50. From much of the area to the north of the Haven Waterway there would be no significant visual effects. Proceeding westwards, the north side of the waterway is initially characterised by urban and industrial areas, past Neyland and Milford Haven to South Hook Point near Herbrandston. Further west, however, the coastal landscape once again becomes rural and essentially open. The National Park is re-entered. The coastline out to St Ann's Head at the southern tip of the Dale Peninsula, which is followed by the Pembrokeshire/Wales Coast Path, becomes more remote, with a clear sense of leaving the activity of the Haven behind.
51. Across the mouth of the Haven views are obtained of the Angle Peninsula within the National Park, at times with the Angle Bay or Freshwater West areas either side. In these views, the tranquil and unspoilt appearance of the coastal landscape is a key element. Whilst the Valero refinery is prominent on the distant skyline, it stands as a solitary feature, contrasting with and divided sharply from the adjacent countryside. The proposed turbines would add to the incursion of large-scale structures into the existing scene. From Great Castle Head (Viewpoint C, distance to nearest turbine 7.4km), the proposal would significantly extend the envelope of development at Valero further south into the surrounding countryside. Whilst they would be distant

objects and occupy only small part of the field of view, their rotating blades would draw the eye. Although the marine jetty at South Hook is also evident in the mid-distance, the turbines would nonetheless adversely affect the coastal view and the visual amenity of the Park and its immediate setting. Moreover, the jetty features less prominently in similar views from other parts of the Coast Path further to the west.

52. From the Coast Path at St Ann's Head (viewpoint A, distance to nearest turbine 10.2km) the rotating blades of the turbines would appear on the skyline above the Angle Peninsula, directly across the narrow strait at the mouth of the Haven. Although distant objects and therefore small in the field of view, their movement would attract the eye. They would appear as a distinct and separate element in the landscape, to the south of the Valero refinery. From here and from other points on the stretch of the Coast Path between St Ann's Head and Dale the turbines would have a negative effect on the visual quality of the National Park landscape.
53. From Dale waterfront (viewpoint B, distance to nearest turbine 10.6km) the rotating blades of the turbines would appear on the distant horizon as a detracting feature alongside the Valero refinery, thus harming this view from within the National Park. There would be some similar adverse effect from Castlebeach Bay near Dale (viewpoint 17, distance to nearest turbine 9.4km), although from this vantage point the headland of Angle Point would obscure more of the turbines.
54. There was disagreement between the respective landscape witnesses as to the significance of these effects, with assessments ranging from moderate/slight (and therefore not significant) to moderate-moderate/major. Balancing all factors, I consider that the turbines would have a moderately adverse visual impact on this part of the National Park and for users of this part of the Pembrokeshire/Wales Coast Path.
55. The appellant relies to a considerable extent on the presence of the Valero refinery close to the site. This is plainly a significant factor in terms of the baseline situation against which the proposal must be assessed; I have had full regard to this in my deliberations. However, I do not regard the refinery's presence as providing a convincing argument for the proposed wind farm. The visual and spatial character of the proposed development is very different to the refinery; I do not consider that the development would be seen as complementary to the refinery, somehow assimilated into the landscape by the refinery's presence or as a consolidation of what is already present. Rather, the number, position and spread of the turbines and the different characteristics of their built form would result in a distinct new development form in this location, which from many directions would appear as a separate and substantial additional development, considerably extending and spreading the built form into and across the adjacent countryside.
56. The Council raises additional points concerning the cumulative visual effects of the proposed turbines in combination with other existing and consented turbines in the wider area. The ES concludes that there would be no significant cumulative landscape or visual effects. I consider that there would be some cumulative visual effects, particularly for walkers following the Coast Path, due primarily to the cumulative effect in conjunction with the Wear Point turbines. However the principal adverse visual consequences of the development essentially arise from the visual impact of the scheme in its own right.

57. I recognise that the actual footprint of development would be small and that the proposal would be "visually permeable", allowing substantial views between the turbines and leaving much of the underlying agricultural character of the land intact. Nonetheless, the scale of presence of the turbines in the landscape would be large, due to the height of the structures, the scale and movement of their rotating blades and the overall size of the development envelope. Whilst the development would have a limited life of 25 years, this is a substantial period for effects to be evident and tolerated. The renewable energy and greenhouse gas emission benefits of the development would similarly be restricted to the length of its operational life.
58. I do not regard the extent of the refinery's illumination during darkness as a matter which assists the appeal proposal. At such times the turbines and the features of the surrounding natural landscape would not be apparent. It is views during the hours of daylight which are important here.
59. I acknowledge that the LANDMAP visual and sensory aspect area within which the site is located is evaluated as having a medium sensitivity to change. I also recognise that, due to factors such as topography and the land limits to south and west, the overall extent of turbines' visual effects on the landscape and human receptors is more geographically restricted than might otherwise be the case. However, the proximity of the proposal to the National Park and the effect of the proposal on the Park, including views into and out of the Park, is a key consideration.
60. In relation to this, and drawing together all of the above, I conclude that the proposed development would have a significant and adverse visual effect on the character and appearance of the landscape of the National Park, particularly as perceived and experienced from substantial areas south and west of the site including the B4320 ridge route to Angle, the B4319 ridge route from Castlemartin to Freshwater West and parts of the Angle Peninsula, Angle Point and Angle Bay together with significant lengths of the Pembrokeshire/Wales Coastal Path. I consider that receptors will have an enhanced level of sensitivity in these locations, given the likelihood of a recreational dimension to the journey (whether by car or on foot, bicycle or horseback) and, whether the purpose of the journey is recreational or not, the probability of a general awareness and appreciation of the landscape qualities of the area.
61. LDP policy GN.1 contains criteria which development proposals should satisfy, relating to compatibility with context, avoiding significant harm to visual amenity, and protecting landscape character and quality including the special qualities of the National Park. I conclude that the proposal would have a substantial harmful impact on the visual character and quality of the landscape, particularly in relation to the adjoining Pembrokeshire Coast National Park. As such the proposal conflicts with policy GN.1 of the development plan and national policy guidance in this respect.
62. In considering this issue I have also had regard to the policy framework for consideration of wind energy proposals within the National Park. However, there is nothing in this which assists the appeal proposal. National Park LDP policies first and foremost require decisions to be taken furtherance of the statutory purposes of the Park. In relation to wind energy development, consideration is afforded, in appropriate circumstances, to proposals potentially of up to 3MW. The accompanying SPG indicates possible potential for a small cluster of medium or large turbines (i.e: 2-3) on land close to existing oil refinery chimneys. However, the proposal here is for a scheme of 5 large turbines, a significantly larger order of development. Moreover,

the National Park Authority objects to the proposal, on account of its harm to the Park's special qualities and to National Park purposes.

Heritage assets

63. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires me, in considering whether to grant permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
64. National planning policy, as set out in Planning Policy Wales (PPW), confirms that it is important that the historic environment – encompassing archaeology and ancient monuments, listed buildings, conservation areas and historic parks, gardens and landscapes – is protected¹⁰. PPW also confirms that the desirability of preserving an ancient monument and its setting is a material consideration in determining a planning application¹¹. It also indicates that where a development proposal affects a listed building or its setting, the primary material consideration is the statutory requirement in respect of listed buildings as set out above¹².
65. In relation to conservation areas, PPW states that, should any proposed development conflict with the objective of preserving or enhancing the character or appearance of a conservation area, or its setting, there will be a strong presumption against the grant of planning permission. In exceptional cases the presumption may be overridden in favour of development deemed desirable on the grounds of some other public interest¹³.
66. PPW also sets out that local planning authorities should protect parks and gardens and their settings included in the first part of the Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales. The effect of proposed development on such a park or garden or on its setting may be a material consideration in the determination of a planning application. Information on the historic landscapes in the second part of the Register should be taken into account by local planning authorities in considering the implications of developments which are of such a scale that they would have a more than local impact on an area on the Register¹⁴.
67. In terms of the development plan, policy GN.38 states that development affecting sites and landscapes of architectural and/or historical merit, or their setting, will only be permitted where it can be demonstrated that it would protect or enhance their character and integrity.
68. The development would have no direct physical effect on any designated historic heritage site. The proposal's effects on such sites concern effects on the settings of such assets, which I consider in turn.

¹⁰ Planning Policy Wales paragraph 6.1.1

¹¹ Planning Policy Wales paragraph 6.5.1

¹² Planning Policy Wales paragraph 6.5.9

¹³ Planning Policy Wales paragraph 6.5.17

¹⁴ Planning Policy Wales paragraph 6.5.25

69. The grade I listed Church of St. Decumanus, Rhoscrowther is a medieval parish church, possibly of C13 origin and with a C14 southeast chapel, tower and north transept but heavily restored in the C19 and early C20. The church was damaged as a result of an explosion at the Valero refinery in 1994, and whilst the damage to the church was largely repaired, the houses at Rhoscrowther were subsequently largely purchased and cleared, leaving the church without a regular congregation. The church was therefore closed in 2004 and passed to the Friends of Friendless Churches in 2005.
70. Although the church is no longer in regular use this does not negate its architectural and historical importance. It remains a significant element of the historical and cultural fabric of the area, as attested to by evidence of its on-going occasional use, visitor book entries and its inclusion on the Priors and Pilgrims Trail.
71. The church is situated within the hamlet of Rhoscrowther, although most of the dwellings have been cleared following the refinery explosion leaving the layout of access roads and overgrown former house plots. The church stands within a walled churchyard, on rising land to the north of a stream which flows to Angle Bay to the west. The churchyard has a gate at its upper (north) end, and a second gate at its south-eastern corner. Next to the south-eastern gate stands a small C19 schoolhouse, which is listed in its own right (grade II). Also in the churchyard, between the church and the schoolhouse, stands a grade II listed medieval cross shaft and base. There is a clear visual and functional relationship between these elements.
72. The church and its companion listed buildings form an intimate group which has something of an enclosed and isolated feel resulting from its valley location, the clearance of much of the village and mature trees which limit views outwards from the churchyard. However, from within the churchyard there are partial views eastwards towards the upper parts of the enclosing valley, where the turbines would be located.
73. Although the Valero refinery boundary lies only some 200m to the north, the intervening steep and wooded slope provides substantial screening, so that there is little visibility of it from within the churchyard. Notwithstanding that the appellant's historic environment witness refers to the noise of the refinery as "a constant reminder of its presence", at my visit I did not perceive the noise of the refinery as a significant component of the church's setting.
74. The nearest turbine would be located about 700m from the church. As the additional viewpoint photomontages and wireframes demonstrate, parts of the turbines would be plainly visible from various locations within the churchyard. One photomontage shows the majority of turbine 4 and the upper blade of turbine 5 visible above the schoolhouse roof and background vegetation in the view towards the cross shaft and schoolhouse from the vicinity of the church itself. Another photomontage, taken from the south end of the church looking towards the schoolhouse and path leading to the south east gate, shows the hubs and blades of turbines 1 and 2 behind the schoolhouse and churchyard gateway. A third photomontage, taken from the roadway outside the main (north) churchyard gateway and looking towards the church and schoolhouse, shows turbine 4 located on the skyline to the east, above the churchyard's valley setting. Although the position of turbine 4 is somewhat peripheral at this precise point, from this, the other photomontages and wireframes and my own on-site observations I am satisfied that from within the northern part of the churchyard, passing between the main churchyard gate and the church entrance

and around the east side of the church towards the schoolhouse and south-east gate, turbines 4 and 5 would have a substantial visual impact on the setting of the church within its churchyard and the other listed buildings concerned.

75. I consider that the turbines would have a pervasive presence and would be perceived from within the churchyard as a prominent and distracting feature that would detract from the subdued and peaceful setting of the Church of St Decumanus and intrude upon the experience of the grouping of church, schoolhouse and medieval cross shaft. There would be a substantial level of harm to the setting of the grade I listed church and associated grade II listed schoolhouse and cross shaft and base.
76. Eastington Manor House is a C14/early C15 rubble stone tower house located at the western end of a range which also contains the C18/19 Eastington Farmhouse. The Manor House is a Grade I listed building and a Scheduled Ancient Monument (SAM), whilst Eastington Farmhouse is listed Grade II. The tower house and farmhouse occupy a south-west facing slope, overlooking Angle Bay, and stand some 500m to the north-west of Rhoscrowther Church. Both buildings are experienced and understood as part of the historic complex of farm buildings situated on the slope above the bay; however, their setting is heavily affected by the presence of the Valero refinery, which stands immediately behind and dominates most views of the buildings.
77. The nearest turbine would be positioned about 1100m from the tower house and farmhouse. The principal aspect of the buildings is not towards the appeal site, and due to the landform the turbines would not be prominent in views from or towards these heritage assets. Although Cadw alludes to turbine visibility in views of Eastington Manor from the north-west, such views are limited and already influenced by the dominating presence of the refinery. Taking all of this into account I conclude that the development would have a low/medium impact on the settings of Eastington Manor and Eastington Farmhouse.
78. Hilton Farmhouse at Rhoscrowther is a Grade II listed small farmhouse dating from the C18 or possibly C17. It has been unoccupied since the refinery explosion. The listing description gives no specific reason for its listing, but mentions various architectural features of the building. The extent of the setting of the farmhouse is heavily constrained by its position amongst trees in the valley bottom. Because of this the proposed turbines would not harm the setting of Hilton Farmhouse.
79. Cadw also draws attention to effects on the settings of the Wallaston Round Barrows and Corston Beacon Round Barrow SAMs. The latter survives as an earthwork of up to 1.5m high and about 30m in diameter. It is in an open and exposed position with panoramic views. The ES notes that the monument is primarily of heritage value for its archaeological interest, and that while the role of its siting and contemporary views must be a matter of some conjecture, it was presumably sited in such a prominent position both to be visible and to take advantage of outward views. It is also widely considered that views of contemporary features and particularly other similar monuments are relevant. The setting is therefore taken to contribute strongly to its heritage value. The view from Corston Beacon Round Barrow towards Wallaston Round Barrows, a group of four Bronze Age burial mounds (of broadly similar size to the Corston Beacon Barrow) about 750m to the north-west is a significant aspect of this setting; although the comparatively modest profile of the remains means that their intervisibility is limited, the spatial relationship in the landscape between Corston Beacon Round Barrow and Wallaston Round Barrows is important to an understanding and appreciation of their heritage significance.

80. The nearest of the 5 turbines would be around 1.5km from the Wallaston Round Barrows and 2.2km from Corston Beacon Round Barrow; the turbines would lie in the same direction of sight as Wallaston Round Barrows, seen from the Corston Beacon Barrow. Whilst the Valero refinery is already a major feature in such views, the proposed turbines would be significant and distracting features in views towards the Wallaston Round Barrows from the vicinity of Corston Beacon Round Barrow. I concur with Cadw's assessment that the development would have a low/medium impact on the settings of these SAMs.
81. Turning to the various heritage assets in the Angle area, whilst the Grade II listed Rocket Cart House and Lookout Tower (about 3km from the site) was designed and sited to provide far reaching views of the coastline to south, west and north, the same does not apply to the landward view towards the appeal site. This is borne out by the lack of windows in the east elevation of the lookout tower. Although the turbines would be visible in views from the vicinity of this listed building, there would be no effect on its heritage significance, and its setting would not be harmed.
82. The Angle Conservation Area designation covers the whole of the village of Angle and an area of hinterland, including part of Angle Bay. Principal elements of the Conservation Area's character and appearance are the historic form and character of the village core focussed on the village street and surrounding medieval field pattern, and the relationship of the settlement, including the outlying buildings located around the tidal inlet and following the edge of Angle Bay as far as the Point House, to the bay itself. From this latter area in particular the views across the bay are intrinsic to the character of the conservation area and its setting.
83. The turbines would not generally be visible from Angle's main street or seen in conjunction with listed buildings within its main built-up area. However, from the northern side of the inlet and around to the Point House the proposed turbines would appear as prominent, large-scale structures with rotating blades, located directly across the bay. The south-easterly aspect across Angle Bay forms a significant view, intrinsic to the character and setting of the Conservation Area. Whilst the distance to the turbines, at about 4km, would be considerable, and I recognise that the Valero refinery already affects this view, I consider that the 5 turbines would be readily apparent as a major feature and would distract the eye, particularly due to the movement of their blades. For this reason I conclude that the proposed development would result in some harm to the setting of the Angle Conservation Area.
84. Further afield, the Grade I listed Church of St Michael at Castlemartin and Grade II* remains of the Old Vicarage occupy a hollow in the landscape and are set around with trees, creating a fairly intimate setting. There are no significant longer-range views of the church in the landscape. Whilst the ZTV analysis indicates that the blade tips of the turbines might be marginally visible from this area, over the intervening ridgeline, at a distance of around 3km this would not harm the settings of the church and old vicarage.
85. The listed churches of St Twynnells and St Petrox occupy ridgeline locations to the east of Castlemartin and appear as landmarks from various points in the surrounding landscape. However, the appeal site is about 5km from these churches, and the turbines would not impinge materially on significant views of the churches in the landscape or be particularly noticeable in views from the churches themselves. I conclude that the turbines would not harm the settings of these heritage assets.

86. The former house at Orielson (now Orielson Field Centre) is a Grade II* listed building, while the associated parkland is a registered park and garden of special historic interest. Within the registered parkland, the dovecote and attached courtyard ranges of farm buildings at West Orielson are also Grade II* listed. The proposed turbines would be situated about 5km away to the north west of these heritage assets. The setting of Orielson is primarily defined by its associated historical parkland and agricultural holding. There are no designed views from or of the house that would be affected by proposed turbines; nor are there any identified significant views associated with the registered park and garden which would be affected. Although the banqueting tower within the park was located so as to afford views from its upper storeys, the building is now an empty shell. Such previous views would in any event have been principally over the associated parkland. The dovecote and courtyard range of farm buildings at West Orielson have a tightly defined setting, due to their heritage significance as a discrete and self-contained physical grouping of estate farm buildings. Again, I conclude that the settings of these heritage assets would not be harmed.
87. The Council's evidence at the inquiry also drew attention to a significant number of listed buildings in the vicinity of Hamilton Place, Milford Haven. However, there is no evidence that the settings of these buildings, so far as this contributes to their heritage significance, goes beyond their position overlooking the waterfront and their relationship to the historic port area. I find nothing persuasive in the proposition that the proposed turbines, which would be located some 3.5km away and separated from the listed buildings by the full width of the Haven waterway, an intervening oil refinery and the elevated ground on which the refinery is positioned, would harm the settings of these heritage assets.
88. The proposal would occupy land within the Registered Milford Haven Waterway Historic Landscape. The ES concludes that the impact of the development on the historic landscape would be slight overall, based on the conclusions of the supporting ASIDOHL¹⁵. Cadw considers that the proposal would result in a more than local impact. However, having regard to the overall diversity and industrial components of the designated area, and the relationship of the scheme to these industrial components, I concur with the ES conclusion that the implications for the Historic Landscape would be slight. In my judgement the proposal would not have significant negative implications in these terms.
89. I have considered all of the other heritage assets mentioned in the evidence, but in short I do not find anything which leads me to conclude that the proposal would cause harm to the settings of these other assets to any substantive degree, having regard to the extent of the setting of each asset, the contribution of the setting to heritage significance and the effect of the proposal on this.
90. In summary, the proposal would cause substantial harm to the setting of the nearby Grade I listed church of St Decumanus and the associated listed schoolhouse and cross shaft and base. It would have a low/medium adverse impact on the setting of the Grade I listed Eastington Manor and Grade II listed Eastington Farmhouse. There would also be adverse impacts on other heritage assets. As such the proposal would conflict with LDP policy GN.38 and national policy guidance in this respect.

¹⁵ Assessment of the Significance of the Impact of Development on Historic Landscape

Proposal benefits

91. The proposal would have a maximum generating capacity of 12.5MW and would deliver electrical power from a low carbon, renewable source sufficient for about 7000 homes throughout its operational life. The windfarm would displace between 14000 (based on gas generation) and 33732 (based on coal generation) tonnes of CO₂ emissions each year entering the atmosphere.
92. This would be a substantial contribution towards the increased share of energy production from renewable sources and the reduction in greenhouse gas emissions sought by the UK Government's energy policy and required by relevant legally-binding targets. Such contribution is a significant consideration, given the challenges posed by climate change and the commitment of the UK and Welsh Governments to address this through, amongst other things, greater energy production from renewable sources.
93. Although the UK Government's stance on onshore wind proposals may have shifted recently, it is plain that the Welsh Government continues to see onshore wind as a key part of meeting the vision for future renewable electricity production.
94. I do not accept the Council's suggestion that the need for new renewable electricity generation is diminishing because targets are being met. The 2013 update to the UK Renewable Energy Roadmap indicates that the UK had by that time achieved only one third of its 2020 target¹⁶. More recent indications¹⁷ confirm expectations that the 2020 target will not be met. Moreover, maintaining progress in electricity generation from renewable sources is of increased importance due to the shortfall in progress in respect of heat and transport.
95. The Council also submits that the installed and approved onshore wind capacity exceeds the 2GW 2020/2025 estimated potential as set out in the Welsh Assembly Government Energy Policy Statement (March 2010)¹⁸. However, the Welsh Government uses installed capacity as a measure of progress. As at the end of 2013, Wales had an installed onshore wind capacity of about 520MW – roughly a quarter of the figure in the Energy Policy Statement. Although further capacity will have been installed since then, the extent to which all currently-approved schemes might proceed is not certain. Moreover, the Energy Policy Statement figure is not a limit. Given the evidence of an on-going urgent need to increase UK energy production from renewable sources and the continued Welsh Government policy support for onshore wind energy proposals which are environmentally acceptable, the contribution that the proposal would make to energy delivery from renewable, low-carbon sources is an important consideration.
96. The Council produced statistics to show its track record in permitting other wind energy developments elsewhere in Pembrokeshire, where impacts have been judged acceptable. That said, there is no quota or cap which applies to a given local planning authority area. Individual schemes must be assessed on their merits, having regard to policy and material considerations.

¹⁶ Inquiry Doc CD PP 22 Fig 5

¹⁷ Inquiry Doc RWF 5

¹⁸ Inquiry Doc CD PP 16

97. The proposed development would yield between 26 and 30 GWh per annum; the potential turbines to be used would produce capacity factors of 29.5-33.7%, significantly above the onshore wind average of 25.74%. Moreover, the existence on site of a 132KV grid connection is a clear advantage for quick and easy delivery of the proposal's energy output. In these terms the site plainly has advantages.
98. The ES estimates the amount of capital investment represented by the development at £13.7M. The total investment at development and construction stage to the local economy is put at £940,000 and for the whole Wales economy some £3.97M. Adding indirect and induced effects, the ES estimates the overall economic contribution to be about £1.43M to the local economy (£6M to the Wales economy). During its life the operation and maintenance of the wind farm would generate local expenditure of an estimated £160,000 per annum and total benefit throughout Wales of £350,000 per annum. Decommissioning could require work in the order of £300,000. In addition, a Community Benefit fund (possibly £50,000 per annum) would benefit local groups and projects.
99. There is a lack of Wales data on the employment effects of windfarm developments. Using such figures as are available, the ES suggests that the project would generate 1.1 FTE jobs locally throughout the lifetime of the development and 3.3 FTE jobs throughout Wales as a whole.

Other matters

100. Although the Council considers that the effects of the scheme in other respects would be acceptable, other parties have nonetheless raised concerns about some of these matters.
101. Many local residents have voiced concerns about the proposal's visual impact on the area; I have taken this into account as part of my earlier assessment of landscape and visual effects. However, owners or occupiers of some dwellings have also raised concerns about visual impact in relation to living conditions at these properties. Where requested to visit a particular property, I have done so and made my own assessment; in other cases I have had these objections in mind when conducting my inspections of the locality. In summary, I consider that whilst a small number of dwellings would have views of the turbines, either through certain windows facing in the general direction of the site or from parts of the garden or external amenity space, in no case would the presence of the turbines in the view be so intrusive or pervasive as to make the dwelling an unattractive or unsatisfactory place to live. I do not consider that the living conditions pertaining to any dwelling would be substantially harmed by the proposed development.
102. Some concerns have also been raised about the adequacy of the assessment of noise effects, particularly because of what are said to have been unrepresentative background conditions during the measurement period. Nonetheless, the ES analysis concludes that the operation of the turbines would satisfy ETSU-R-97 guidelines designed to ensure that turbine noise does not cause undue daytime or night-time disturbance. Conditions could be imposed to enable acceptable noise limits to be set, and enforced in the event of any breach.
103. Concerns have also been voiced about shadow flicker; this was also assessed in the ES. The assessment demonstrates that shadow flicker effects would potentially occur in the cases of only 5 dwellings (all located in Rhoscrowther), and even then potentially for brief periods only at limited times of the year. Shadow flicker effects

can be avoided by programming the turbines to curtail their operation at critical times; I am satisfied that this issue could be adequately resolved by planning condition. Suggestions by some that shadow flicker could adversely affect vehicle drivers or that a "night-flicker" effect might be caused by the movement of blades against the background of refinery lights are unsupported by technical or scientific evidence.

104. Similarly, a condition can be imposed to secure mitigation measures in the event of interference being caused to TV reception. It would be possible to extend this to cover users of the caravan and camping site at Newton Farm.
105. I have considered the effects of the proposal in relation to horse riding activity in the area. The nearest bridleway is a north-south link between the B4320 and the minor road north of Hoplass, which I am told is used by riders. At its closest, the lane passes within about 250m of the nearest turbine position. I recognise that some horses can react to the presence turbine blades, and that current British Horse Society guidelines recommend a separation distance of three times blade tip height where this would be greater than 200m. However, I give little weight to this matter, as I have little detail of frequency or nature of use of this route, and such evidence as has been given could not be tested through cross-examination.
106. Concerns have been raised about the possible negative effect of the proposal on tourism in the area, both generally and specifically in relation to the caravan and camping site at Newton Farm. Research findings reported in the ES indicate that the majority of respondents have a neutral or positive attitude towards windfarms and feel that their decision to visit an area would be unaffected by the presence of a windfarm, whilst more than a quarter reported that their decision would be affected. Overall, the ES concludes that there is no clear evidence that wind farm developments positively or negatively affect levels of tourism. Whilst it is possible that some visitors may be dissuaded from visiting the locality or staying in the area, I find insufficient evidence to reach any firm conclusion on this.
107. In relation to the touring caravan and camping site at Newton Farm I observed that the field area used for this is fairly extensive and has aspects both towards and away from the appeal site. The view towards the turbines, which would be at a distance of about 1.5km site, would also include Valero. Moreover, for those staying at the site during the holiday season, awareness of the presence of the turbines would be likely to be reduced by the presence of other caravans and tents on the land. Whilst the experience of those staying at the caravan and camping site would change, and I do not discount the possibility that this might alter the decision of some to stay at the site, I have no conclusive evidence one way or the other on this matter.
108. I have had regard to the various other appeal decisions over the years which have been referred to, either permitting or refusing wind turbines in various locations around the Haven and close to the National Park. Most of these decisions concerned much smaller-scale proposals for fewer turbines of lesser height. Each proposal will have been considered on its own facts, evidence and merits and in relation to the characteristics of its location, relationship to the National Park and to areas of urban or industrial character. Because of these factors, I do not consider that any of these decisions are considerations which weigh heavily in the balance either for or against the appeal proposal. Whilst there are a number of existing/consented turbines in the wider locality, which are part of the baseline conditions setting the context for this proposal, none of these are closely comparable to this proposal. The four turbines at Wear Point, whilst similar in scale, relate much more directly to the industry and

urban areas of the Haven and are much further away from the National Park boundary.

109. I have also had regard to the balance of representations for and against the proposed development, in writing at the application and appeal stages and by appearance in person at the inquiry. There plainly is an element of support for the proposal, particularly reflecting its socio-economic benefits and support for on-shore wind energy in general. However, the clear majority of representations oppose the proposal. The number of representations for or against a proposal is not by itself indicative of a scheme's acceptability or otherwise, and some of the detailed points of objection have little substance or relevance. Nevertheless, the broad thrust of concern as to the proposal's adverse visual and landscape effects, expressed by many residents, visitors to the area and local groups and consultees, reinforces my view that the proposal would cause substantial harm to an area highly valued for its qualities of remoteness, tranquillity and open, unencumbered character.

Balancing and overall conclusions

110. The proposed development would cause substantial visual harm to landscape character and visual amenity in respect of significant parts of the nearby Pembrokeshire Coast National Park. In particular, it would cause significant harm to the landscape and visual qualities of Angle Bay, parts of the Angle Peninsula and the area around Freshwater West. Less significant visual harm would also be caused to the landscape of the National Park in views from St Ann's Head and other locations around the Dale Peninsula. There would be a significant adverse effect on views obtained from substantial lengths of the Pembrokeshire/Wales Coast Path National Trail.
111. The existence of the Valero oil refinery close to the site does not alleviate this visual harm. The prominent but essentially isolated presence of this industrial feature would be supplemented by an substantial cluster of competing large scale structures with rotating blades which would substantially extend the envelope of prominent development away from the Haven Waterway and into the narrow buffer of countryside bordering the National Park. The scheme would have a harmful, visually compounding and confusing effect, rather than one of beneficial co-location.
112. In relation to historic environment matters I have concluded that the proposal would cause substantial harm to the setting of the Grade I listed St Decumanus Church and the associated Grade II listed schoolhouse and churchyard cross shaft and base. The development would cause a low/medium level of harm to the settings of Eastington Manor (Grade I listed and SAM) and Eastington Farmhouse (Grade II). It would also have a low/medium adverse impact on the settings of the Wallaston Round Barrows and Corston Beacon Round Barrow SAMs. The proposed development would also result in some harm to the setting of the Angle Conservation Area.
113. In favour of the proposal, there would be substantial benefits arising from the delivery of electrical power equivalent to the consumption of about 7000 homes from a low carbon, renewable source throughout its operational life and a consequent reduction in CO₂ emissions. I also recognise the socio-economic benefits that would derive from the scheme, locally and more widely across Wales, in terms of overall economic contribution, some jobs and potential links with the wider community.
114. In determining the weight to be given to these considerations I must have regard to the statutory purposes of National Park designation, in terms of conserving and

enhancing its natural beauty, wildlife and cultural heritage. PPW states that the duty applies to activities affecting National Parks, whether those activities lie within or outside the designated areas. In the light of this duty I attach particular importance to the objective of protecting landscape character, quality and diversity in relation to the special qualities of the Pembrokeshire Coast National Park, as set out in criterion 3 of LDP policy GN.1. The proposal would not comply with this policy requirement.

115. Turning to effects on heritage assets, I am required to pay special regard to the desirability of preserving the setting of any listed building affected by proposed development in reaching my decision. The substantial harm which would be caused to the setting of the Grade I St Decumanus Church, together with the Grade II listed schoolhouse and cross shaft and base, carries particular weight because of this statutory requirement. Whilst a lesser amount of harm would be caused to the settings of the Grade I Eastington Manor and Grade II Eastington Farmhouse, I give appropriate weight to these matters also. The harm to the settings of the Wallaston Round Barrows and Corston Beacon Round Barrow SAMs and to the setting of Angle Conservation Area are also factors that weigh in the balance against the development.
116. In summary, the harm to the interests of heritage assets that would result weighs considerably against the proposed development. The proposal would conflict with LDP policy GN.38, which seeks to safeguard the settings of sites and landscapes of architectural and/or historical merit.
117. In the light of the above, I conclude that the proposal would fail to satisfy LDP policy GN.4, as the objective of delivering renewable energy developments through environmentally acceptable solutions would not be achieved. It would not accord with the objective embedded in policy SP 16 of protecting the landscape and natural and built environment of Pembrokeshire and adjoining areas.
118. I give significant weight to the benefits of the scheme in terms of the substantial contribution it would make to delivering energy from renewable sources, to cutting greenhouse emissions and to meeting Government targets in relation to these matters. I also give significant weight to the socio-economic benefits of the proposal. These are important considerations, supported by the positive overall thrust of policy towards renewable energy production, including onshore wind.
119. However, policies at local and national level recognise the balance to be struck between wind turbine development and landscape, natural and built heritage protection. It is almost inevitable that large wind turbines will bring about substantial visual change to a locality; however, the amount of harm resulting will vary according to the placement of the scheme, the sensitivity of the landscape and its receptors and the degree of protection ascribing to features within it.
120. Having examined the evidence, I have concluded in this case that, notwithstanding the nearby presence of the Valero refinery and the features of the wider Haven waterway, the proposal would cause substantial harm to significant parts of the nearby National Park and sensitive receptors within it; additionally it would cause substantial harm to the settings of important heritage assets. In my judgement, the harm clearly outweighs the benefits of the proposal.
121. I have taken all other matters raised into account, but do not find anything of such weight as to disturb my overall conclusion.

122. As regards the development plan, I have concluded above that the proposal conflicts with LDP policies GN.1 General Development Policy and GN.38 Protection and Enhancement of the Historic Environment, and through these matters also fails to satisfy policy GN.4 Resource Efficiency and Renewable and Low-carbon Energy Proposals. It would be out of accord with strategic policy SP 16 The Countryside and with strategic policy SP 1 Sustainable Development, since the positive socio-economic effects would be outweighed by significant negative environmental impacts. The development does not gain policy support from strategic policy SP2 Port and Energy Related Development, as the site does not fall within the area covered by this policy. Overall, I conclude that the proposed development would be in clear conflict with the development plan, and that material considerations do not exist which are sufficient to indicate a determination otherwise than in accordance with the plan.

123. Consequently, and having regard to all matters raised, I dismiss the appeal.

Alwyn B Nixon

Inspector