

REPORT OF THE CONSERVATION POLICY OFFICER

SUBJECT: RELEVANT REPRESENTATION ON ATLANTIC ARRAY OFFSHORE WINDFARM PROPOSAL

Purpose of Report

This report presents, for Members to note, the Relevant Representation made by the Authority on the Atlantic Array Offshore Windfarm ('Atlantic Array') proposals.

The report also outlines the next steps in the application process.

Background

The Atlantic Array proposals consist of the construction and operation of up to 240 wind turbine generators with a maximum tip height of up to 220m in the Bristol Channel between Lundy Island and the South Wales Coast, up to four offshore substations, up to five meteorological stations, inter-array cables that collect and transfer power generated by the turbines to the offshore substations and export cables that take the electricity generated by the turbines to shore. The onshore electrical works are not expected to affect this National Park. The Atlantic Array is expected to have an installed capacity of up to 1,200 MW.

The Atlantic Array application has been deemed by the Planning Inspectorate as suitable to be progressed to the examination stage. Anyone with an interest in the proposal and wishing to contribute evidence at the examination stage was required to submit a Relevant Representation (limited to 500 words) by 16th September 2013.

This Authority has an interest in the proposals; accordingly a draft Relevant Representation was drafted by Officers, circulated to the Chair and Vice Chair of the Authority and duly submitted to the Planning Inspectorate. The Representation was based substantially on concerns about the visual impacts of the proposed Atlantic Array on landscape and seascape, and potential impacts on enjoyment of the National Park's special qualities. This stance follows the line taken by officers at the pre-application stage in 2012 and subsequently circulated to Members.

Attached at Annex 1 is Pembrokeshire Coast National Park Authority's Relevant Representation as submitted to the Planning Inspectorate.

Representations have now been published on the planning Inspectorate's website (link at the end of this report). It is understood that there are some 1,775 representations in total, including responses from approximately 1,600 individuals, 35 local groups, 11 national groups, 33 companies, 14 national agencies and 42 democratic bodies.

Next steps

- *Examination:* The Planning Inspectorate has six months to carry out the examination. During this stage, people who have registered to have their say will be invited to provide more details of their views in writing. Consideration is given by the Examining Authority to all the important and relevant matters, including the representations of all interested parties, any evidence submitted and answers provided to questions set out in writing and explained at hearings.
- *Planning Inspectorate recommendation/Secretary of State's decision:* The Planning Inspectorate must prepare a report on the application to the relevant Secretary of State, including a recommendation, within three months of the six-month examination period. The Secretary of State then has a further three months to make the decision on whether to grant or refuse development consent.
- *Post decision:* Once a decision has been issued by the Secretary of State, there is a six-week period in which the decision may be challenged in the High Court (Judicial Review).

Risk considerations

The primary risks associated with the Atlantic Array proposal relate to potential compromise of the special qualities of the National Park, in particular the special quality of coastal splendour, with attendant implications for achievement of the first and second purposes of the National Park (and by extension pursuit of socio-economic wellbeing in pursuit of them).

The Environmental Statement is a highly technical document and in preparing its representation the Authority commissioned consultants to assess elements of the 2013 Environmental Statement. (The consultants had previously been commissioned to assess the draft Environmental Statement in 2012.) The Authority will require specialist representation at the examination stage which would have cost implications.

Compliance

There is concern that the Atlantic Array proposals would have a significant impact on the National Park and would be contrary to national and local policy.

Human Rights/Equality issues

General issues could stem from the compromise of nationally-important protected landscapes and historic assets affected by the proposals.

Biodiversity implications/Sustainability appraisal

There is concern that the proposals could have impacts on biodiversity, including seabirds, cetaceans, fish and bats. The Authority looks to Natural Resources Wales and Natural England to evidence potential impacts on biodiversity.

RECOMMENDATION

That Members NOTE the Relevant Representation (attached at Annex 1 to this report) made in respect of the Atlantic Array Offshore Windfarm proposals.

Background Documents

Consultation documents: <http://infrastructure.planningportal.gov.uk/projects/south-west/atlantic-array-wind-farm/>

Illustration of process: <http://infrastructure.planningportal.gov.uk/wp-content/uploads/2013/03/Application-process-diagram2.png>

(For further information please contact Michel Regelous, Conservation Policy Officer)

Annex 1 to the report of the Conservation Policy Officer

Relevant Representation by PCNPA on Atlantic Array Offshore Windfarm

“Pembrokeshire Coast National Park is the only UK National Park designated primarily for its coastline.

Pembrokeshire Coast National Park Authority contends that the Atlantic Array proposal is counter to the purposes of the Pembrokeshire Coast National Park as set out in the Environment Act 1995 and counter to local and national planning policy (e.g. National Policy Statement for Renewable Energy Infrastructure (EN-3), Technical Advice Note 8, Pembrokeshire Coast National Park Local Development Plan to 2021), as outlined below.

Section 62 (2) of the Environment Act 1995 is central to the delivery of National Park purposes. It places a duty on all relevant authorities to have regard to the purposes of the National Parks when exercising or performing any functions in relation to, or affecting, land in a National Park.

The first purpose of the National Park relates to conservation and enhancement of its special qualities. Pembrokeshire Coast National Park Authority’s conclusion and evidence is that coastal splendour, a special quality of the National Park, will be compromised by the Atlantic Array proposals.

The proposals will have significant effects on visual resources and perceptual qualities experienced from Pembrokeshire Coast National Park. Major impacts are predicted at key viewpoints along the coast - which forms part of the Pembrokeshire Coast Path National Trail and the Wales Coast Path - and these will be experienced sequentially by receptors on 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 an uninterrupted, undeveloped seascape, with the proposed Atlantic Array often being seen in combination with Caldey Island and with Lundy as a backdrop. In many views the proposed Atlantic Array would be a distinct, albeit distant, focus.

When visibility is good the scheme would be a constant feature in views along much 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 would also experience a significant effect on their character. There would also be significant effects on views from St. Govan’s Chapel.

The second purpose of the National Park includes enjoyment of the special qualities of the National Park by the public. If a special quality is compromised (as concluded above) then it follows that so too is public enjoyment of it. This argument stands independently of net visitor volumes, visitor profile and tourism value.

Pembrokeshire Coast National Park Authority is concerned about potential impacts of the proposed Atlantic Array on biodiversity. The majority of the seabirds that may be affected by the proposed development nest on Pembrokeshire islands which are of European importance and integral to the biodiversity of the National Park. The National Park Authority would look to Natural Resources Wales and Natural England in terms of impacts on biodiversity.

Accordingly, Pembrokeshire Coast National Park Authority wishes to register its objection to the Atlantic Array Offshore Windfarm proposals.”

Pembrokeshire Coast National Park Authority
National Park Authority – 23rd October, 2013