

4 March 2020

Our Ref: NP/20/0082/OBS

Your Ref: DNS 3245065

Mr Christoher Sweet  
Planning and Environment Team  
Planning Inspectorate  
The Planning Inspectorate  
Crown Buildings  
Cathays Park  
Cardiff  
CF10 3NQ



**Awdurdod  
Parc Cenedlaethol  
Arfordir Penfro**

Parc Llanion, Doc Penfro  
Sir Benfro SA72 6DY

**Pembrokeshire Coas  
National Park  
Authority**

Llanion Park, Pembroke Dock  
Pembrokeshire SA72 6DY

Ffôn / Tel:

Ffacs / Fax:

[pcnp@pembrokeshirecoast.org.uk](mailto:pcnp@pembrokeshirecoast.org.uk)

Dear Sir,

**Town & Country Planning Act 1990 (as amended)**  
**Developments of National Significance (procedure) (Wales)**  
**Order 2016**  
**Town & Country Planning (Environmental Impact Assessment)**  
**(Wales) Regulations 2017**

**Proposal:** 22MW Solar Park and associated infrastructure.

**Address:** Blackberry Lane, Cosheston, Pembrokeshire.

**INTRODUCTION**

I write in response to your consultation regarding the above which relates to a scoping request under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The development proposed is for a Solar PV development, the installed capacity of the development is 22MW and it is therefore a Development of National Significance and jurisdiction for determination rests with the Planning Inspectorate. I trust that the below comments will be taken into consideration when determining the scope of the Environmental Statement to accompany any future application.

The site is approximately 36.9 hectares and is located around 120 metres from the boundary of the Pembrokeshire Coast National Park. It is considered to be within the setting of the National Park. Due to the scale and proximity of the development we wish to comment on this proposal as it appears to us that it has the potential to impact on the National Park.



*Kydym yn croesawu cael  
gohebiaeth yn Gymraeg a  
byddwn yn ateb gohebiaeth yn  
Gymraeg. Na fydd gohebu yn  
Gymraeg yn arwain at oedi*

*We welcome receiving  
correspondence in Welsh, and w  
respond to any correspondence i  
Welsh. Corresponding in Welsh  
will not lead to delay*

## **LEGAL AND POLICY CONTEXT**

### The Environment Act 1995

Section 63 of the Environment Act 1995 sets out the statutory purposes of the National Park as follows:-

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park; and
- To promote opportunities for the public understanding and enjoyment of the special qualities of the National Park

In accordance with section 62(2) of the Environment, any relevant Authority shall have regard to National Park purposes when performing any functions in relation to, or so as to affect, land in a National Park. Relevant Authorities include public bodies, government departments, local authorities and statutory undertakers.

### Local Planning Policy

The Pembrokeshire Coast National Park Authority Local Development Plan (PCNPA LDP), is the development plan for the National Park. Section 4.13 of the PCNPA LDP sets out that whilst the National Park is a landscape designation there are instances where strict application of the boundary in making decisions is not appropriate. As previously set out section 62 (2) of the Environment Act (1995) places a duty on government bodies to have regard to the National Park. 4.13 identifies that in commenting on proposals outside the National Park it will use Policy 1 National Park Purposes and Duty (Strategy Policy).

The Pembrokeshire Coast National Park Management Plan (2019) defines the special qualities of the National Park as:

- accessibility
- coastal splendour
- cultural heritage
- distinctive settlement character
- diverse geology
- diversity of landscape
- islands
- remoteness, tranquillity and wildness
- rich historic environment
- richness of habitats and species
- space to breathe
- the diversity of experiences and combination of individual qualities

The development plan for the application site is the Pembrokeshire Local Development Plan (2013) (PCC LDP). Particularly relevant to the consideration of impacts on the Pembrokeshire Coast National Park are policy GN.1 which states that development will only be permitted where it would not adversely affect landscape character, quality or diversity, including the special qualities of the Pembrokeshire Coast National Park and neighbouring authorities.

The impact of development on the special qualities of the National Park and the impact on the reasons for designating the National Park must therefore be considered within the scope of the Environmental Statement submitted in support of the application.

## **CONSIDERATION**

### Scope of EIA - landscape and visual impact on the National Park

The comments of the PCNPA on the scope of the Environmental Impact Assessment (EIA) are given below. Our comments have been restricted to the main areas where it is considered that there is likely significant environmental impact on the National Park, these relate to the landscape and visual impact of development, both for this individual project and due to cumulative impacts. We have not commented on other likely significant environmental impacts, any omission should not be considered as a view to the decision maker on whether we consider that other impacts exist or not.

We consider that an EIA should include within its scope a Landscape and Visual Impact Assessment. We note that this view is supported by both Natural Resources Wales<sup>1</sup> (NRW) and by the Welsh Government within their decision to screen the proposal as EIA development. The study area for the LVIA should be sufficient to ensure that important viewpoints within and into the National Park are appropriately identified. In particular the LVIA should appropriately consider the potential for cumulative impacts and the potential for significant in-combination impacts arising from the proposed development together with existing development. As noted by NRW we do not consider that what has been submitted in the Landscape and Visual Appraisal is sufficiently detailed to assess likely significant landscape and visual impacts. The comments regarding the LVA by NRW is also noted, in particular that there are potential for significant effects from views towards the NP that should be addressed in any EIA.

Mitigation of landscape and visual impacts, such as additional and new management regimes for the existing landscape features should be fully detailed within the proposal and the effectiveness of the approaches discussed in detail within the Environmental Statement.

### Further comments on the submitted LVA

*LVA Study area* -The LVA study area has been defined based on a Zone of Theoretical Visibility (ZTV). The ZTV does not indicate the height of the development used above ground level and indicates a viewer eye height of 2.0m. The ZTV shows that the site will be visible from a limited area within the National Park primarily to the north and north east. The extent of the study area appears to be justified based on the ZTV submitted. However, it is considered that for the purposes of assessing cumulative effects a wider study area should be used and a ZTV produced showing potential cumulative impacts.

---

<sup>1</sup> Letter from NRW, dated 31 January 2020 (Ref CAS-107287-Q9G5)

*LVA View point selection* - The ZTV shows relatively limited areas of the National Park to the north and west of the site of the proposed development where at least part of the development will theoretically be visible. It is considered that viewpoints 7 and 9 would be representative of viewpoints in the National Park. It is noted that the area around Carew Castle is shown to be visible in the ZTV. It is suggested that a viewpoint from this location would be beneficial and could potentially demonstrate that the conclusion drawn in the LVA that impacts would be negligible at Carew is justified. Viewpoints 1, 2, 5 and 8 are considered representative of views into the National Park from points outside where the development would be present.

Overall it is considered that the viewpoint number and selection is largely appropriate and proportionate for assessing areas where landscape and visual impact might be significantly impacting on the National Park for this individual development. However additional information should be submitted to consider cumulative impacts with other developments.

*LVA assessment of impact on the Pembrokeshire Coast National Park* - The LVA identifies the presence of the National Park and does identify its special qualities. The approach taken in paragraph 6.32 to 6.34 of the LVA is not clear. At paragraph 6.34 it states that: "*Most of the special qualities of the National Park are judged to have low to no susceptibility, with only a small number judged to be of high susceptibility. On balance the National Park is judged to be of Medium susceptibility.*" It appears that some form of aggregating approach is taken to the susceptibility of the special qualities which allows for the reduction in the overall susceptibility of the National Park to be concluded as being medium (notwithstanding that some special qualities are concluded to be highly susceptible). This approach is disagreed with. In our view special qualities such as the National Parks sense of remoteness, tranquillity and wildness; and its diversity of landscape are all highly susceptible to detrimental impacts from this form of development. In our view the National Park is highly sensitive to this form of development and the LVA is flawed in respect to its conclusion of high/medium sensitivity.

*LVA Landscape Impact* – The comments in respect to this within the letter from NRW are fully endorsed.

*Mitigation of landscape and visual impact and landscape enhancement* – The PCNPA accepts that some aspects of the landscape and visual impact of this development can be mitigated. The supporting information has outlined the principles of how the site will be landscaped in the LVA. This information is limited primarily to a statement that "all perimeter hedgerows would also be managed to a height of 3.5m in order to visually contain the development and assisting its absorption into the surrounding landscape". Further consideration of other options for mitigation should be considered, this should include excluding elements of the site from development and creating more substantial landscape buffering features at the site than the existing hedgerows.

Based on the submitted LVA it is considered that the effectiveness of the landscaping at the site and its mitigation of landscape and visual impact are important to the acceptability of this scheme. Judgements on the effectiveness of mitigation are likely to be finely balanced and it is our view that landscaping should be more substantial than the boundary treatments proposed and that detailed information for approval should be available to the decision maker.

*Summary of opinion on LVA*

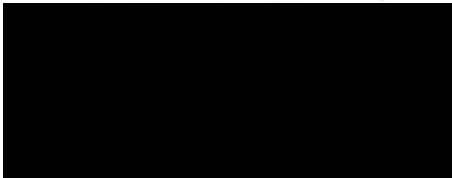
The methods behind the LVA's assessment of the impact on the National Park and support for the conclusions drawn are not considered to be fully justified and should be supported by specific considerations of any impact on the National Park's special qualities. An aggregating approach where an susceptibility of a single special quality to impact can be overlooked if others are not impacted is not considered appropriate.

The PCNPA accept that there is scope to mitigate the impact and provide enhancement to the landscape. But it is not clear that the landscaping would address all residual landscape and visual impact.

**CONCLUSION**

In conclusion, the PCNPA support the submission of a comprehensive Landscape and Visual Impact Assessment as part of the scope of an Environmental Impact Assessment. We have provided some comments on the information currently submitted and we would hope to see a revised and fully detailed LVIA submitted as part of an EIA supporting a future application.

Yours faithfully,



**Matthew Griffiths MRTPI**  
**Team Leader – Development Management**

*CC: Pembrokeshire County Council*