

Ymgyrch Diogelu Cymru Wledig
Campaign for the Protection of Rural Wales
CANGEN SIR BENFRO / PEMBROKESHIRE BRANCH
LLYWYDD / PRESIDENT Professor Arthur Thomasson
ELUSEN GOFRESTREDIG / REGISTERED CHARITY

Developments of National Significance (DNS)
Application by Rhoscrowther Wind Farm Ltd

Proposed Construction of
3 x 135m high wind turbine generators
(model Vestas V117)
and miscellaneous works at

Land east of Rhoscrowther
Hundleton, Angle Peninsula,
South Pembrokeshire

Evidence
of
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1 Introduction and background

1.1 Author's Personal background

- 1.1.1 In addition to work on rural land use and landscape issues throughout Great Britain since the 1960s, wind power issues have progressively formed a significant part of my consultancy business Environment Information Services (EIS) established in 1972. Prior to this I was the chief field officer of the Second Land Utilisation Survey, specialising in mapping the semi-natural vegetation cover of most of England and Wales. On behalf of a wide range of clients in EIS I have dealt with over 400 wind power cases at planning application stage and taken part in over 120 related Public Inquiries in Wales, England and Scotland - in about half also acting as a lay-advocate for objectors. Due to this experience I was twice asked by the Planning Inspectorate to address its All-Inspectors' National Training Events - on wind power Inquiries (2009) and the objectors' perspective (2013).
- 1.1.2 I have been a member of CPRW for 50 years, since 1983 as a Pembrokeshire resident, becoming familiar with wind farm issues in the county in the early 1990s. In 1995 I was asked by CPRW to become its part-time consultant wind power adviser. I accepted and took on this work throughout Wales for the following decade. To do so I resigned as a Ministerial Appointee on the Pembrokeshire Coast National Park Authority, and stood down from both CPRW's National Executive and as Chair of the Pembrokeshire Branch where I was eventually succeeded by my wife, Mary-Rose. With the formation of the Strategic Search Areas under TAN8 in 2005 there was a pronounced 'lull' in wind power applications and my CPRW consultancy did not need to continue. Accordingly, I no longer have that role, and have taken no fee for any work in this county to assist the Pembrokeshire Branch (including the two previous Rhoscrowther appeals). I am currently a member of CPRW's National Executive and its national vice-Chair.

1.2 CPRW's purpose and policy

- 1.2.1 CPRW was founded in 1928 and remains Wales' only voluntary organisation devoted to the conservation of its landscape, arguably the country's greatest yet vulnerable asset. It is a registered membership-based charity with county branches throughout the country whose principal aim is to protect rural landscapes, habitats and rural communities from inappropriate and damaging development and to encourage their enhancement and sustainability.
- 1.2.2 CPRW's national policy on onshore wind turbines states that:

*When assessing the acceptability of any proposed onshore wind scheme:
CPRW will oppose any onshore wind power proposal which has a significant adverse impact on the landscape of rural Wales having regard to:*

- 1. The existing landscape character of the site and its wider landscape setting and the impact of the proposed development upon the landscape character of those areas;*
- 2. The existing views, into and out of, the site and the wider landscape and the impact on those views of the proposed development;*
- 3. The effect upon the public, whether resident or visiting, arising from the development.*

1.2.3 CPRW also has a long-standing national commitment to support the development of large-scale marine renewable technologies which it has always seen as becoming the major portion of Wales' role in addressing the climate challenge. Of particular relevance is the growth of large-scale offshore wind development in the Celtic Sea, from bases in the Haven Waterway area.

1.3 The sequence of proposals, appeals and decisions on or near the site

1.3.1 CPRW objects to selected significant planning applications for any form of development considered to be disproportionately damaging to the landscape and visual amenity. In line with its national policy it does not oppose terrestrial wind energy development in principle: its position is to consider 'each case on its merits' with respect to size, location, and sensitivity of the affected landscape and visual receptors, together with any potential cumulative effects. In that context, it firmly supports the conservation of the landscape within and adjacent to the narrow Pembrokeshire Coast National Park which has - and needs - the highest level of protection. The Angle peninsula, within which the present proposal is located, is the prime example of this sensitivity, not least because of the presence of the Valero oil refinery.

1.3.2 Accordingly, in the 1990s, CPRW Pembrokeshire responded to several wind turbine proposals in the peninsula where it is argued that they would have adverse impacts on important landscapes in an around the National Park (PCNP); damage the amenity of residents due to their scale and location; impact adversely on recreational interests. I took part in each case. The relevance of the catalogue below is that every proposal of all scales in the Angle peninsula was rejected by both the local planning authority and on appeal on these same grounds. Significantly, the decisions agreed with CPRW that the schemes were not justified by the location and characteristics of the nearby (Valero) oil refinery. This is due to the fact that this installation was only consented because its location on the estuary over-rode the then National Park boundary and required a specific Act of Parliament to do so (the Regent Refining Company Act 1962). It therefore cannot be regarded as providing a planning or visual precedent for nearby development within or extending towards the PCNP.

1.3.3 In **1996** CPRW objected to the first wind turbine proposal in the Angle peninsula at **Corston Farm**, 2.5km south-east of the present site, where 16 medium/small sized turbines were later refused consent by the then South Pembrokeshire District Council on grounds of adverse visual impact.

1.3.4 CPRW later successfully objected to an application to Pembrokeshire County Council to construct 3 x 74m turbines at **Wogaston Farm** c1.1km south of the present site. It took an active part in the ensuing Public Inquiry held in March 2001 after which the appeal was dismissed on **16th August 2001** (APP/N6845/A/00/1050866). The Inspector, Mr David Sheers, set in motion a series of comments which have continued in successive decisions to this day, all of which resulted in findings against wind turbine applications in this area.

- 1.3.5 Mr Sheers took account of the need to develop renewable energy [11] but considered [at 15] that the WTGs (wind turbine generators) ‘*would dominate close and local views at up to 1.5km*’ and ‘*appear large in scale ... the movement of the blades would be obvious and appear very distracting. At up to about 6km they could appear intrusive in the landscape*’. He concluded [17] that ‘*the influence of the oil refinery structures on the perception of the proposed WTGs has been somewhat exaggerated*’ (by the appellants). He also noted [19] that ‘*the Inspector at the 1995 National Park boundary review commented that there is considerable merit in retaining the maximum amount of undeveloped land around Angle Bay and that the refinery perimeter fence provides the most appropriate boundary for it*’.
- 1.3.6 Two decades later, CPRW objected to a scheme for 2 x 35m smaller machines south of the **Corston Beacon Tumulus**, also 2.5km south-east of the present site. This was also refused on appeal in **August 2015** (APP/N6845/A/15/3018498), because [17] they ‘*would create an additional prominent element into a landscape setting which already includes the oil refinery, and which would be sensitive to further visual intrusion*’.
- 1.3.7 The same year, CPRW also objected to a further application for a single small 35m machine, again at **Wogaston Farm**, and less than 1km south of the present proposal. It was refused by the County Council on **9th September 2015** (15/0353/FUL) in line with officer recommendation chiefly because ‘*By reason of the turbine’s size and location, the proposal would have a significant adverse impact on the character and visual amenity of the area, including the setting of the Pembrokeshire Coast National Park*’.
- 1.3.8 While CPRW considers that these projects were rightly refused consent in their context, it does appreciate that they were then part of a phase of proposals for relatively modest farm-based schemes, and that the policy context has since changed in view of the ‘climate emergency’. These decisions nonetheless pave the way for an increasingly greater scrutiny of the **2014** proposal by Rhoscrowther Wind Farm (RWF) to Pembrokeshire County Council (PCC) for 5 x 100m turbines on approximately the present site. This appeared to CPRW to be vastly more out of scale with its location and damaging to the character of the National Park than those previously recently refused, and not justified by the presence of the Valero oil refinery – the latter being a continued theme in subsequent appeal decisions.
- 1.3.9 The main points in CPRW’s **2014** objection to PCC were:
1. Adverse impact on the Angle Peninsula, the National Park, the coast path, and Freshwater West in conflict with the LDP
 2. Proposal not justified by the industrialised presence of the adjacent Valero oil refinery
 3. Adverse impact on the enjoyment of bridleways and other public rights of way
 4. Adverse impact on the residential amenity of local residents and on tourism in the area.
 5. Contrary to LANDMAP assessment of the area
 6. Much smaller wind farm development has already been refused in the same area for reasons cited above.

1.3.10 PCC Members refused consent on **21st January 2015**, for the reasons that:

The proposed development will result in a significant adverse visual amenity and landscape character impact (including on the historic environment and Pembrokeshire Coast National Park).

The level of adverse impact is not outweighed by planning policy objectives in relation to renewable energy development.

1.3.11 RWF then appealed against the decision. After a six-day public local Inquiry in **December 2015** - in which CPRW took part as a 'Rule 6 Party' - the appeal was dismissed by Inspector Alwyn Nixon on **4th February 2016** [APP/N6845/A/15/3025045]. He rehearsed the arguments about the (Valero) oil refinery reflecting CPRW's evidence by noting [38] that

[38] '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.

[55] ... 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. ...

[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 ...

[111] The existence of the Valero oil refinery close to the site does not alleviate this visual harm. ... it 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.

- 1.3.12 On **12th March 2016** RWF applied to the High Court for leave to appeal against Mr Nixon's decision. **Mr Justice Coulson** read the papers and on **24th April 2016** and gave his Judgement [ref CO/1394/2016] which included the following: *'I do not consider that the matters raised by the claimant can be properly described as matters of law. They are, on analysis, an illegitimate attempt to question the Inspector's finding of fact and to reopen the planning decision'*.
- 1.3.13 Despite the judgement given against them, RWF sought leave to Appeal on **June 9th 2016**. **Mr Justice Hickinbottom** dismissed their attempt to go for a second appeal concluding with the words: *'For those reasons, like Justice Coulson, I consider the grounds essentially to be a challenge to the merits of the decision, rather than a challenge in law. None of the grounds is arguable: and I refuse the application to pursue the section 288 application.'*
- 1.3.14 On **14th October 2016** RWF made a further attempt to overturn the decision against them but a 'Reading Judge' gave a judgement against them on **18th January 2017** (order number 20162507).
- 1.3.15 On **31st January 2017** RWF returned to the High Court again. They appealed the latest decision and applied for permission to go to a further planning appeal. Despite the fact that all the issues had been considered by the earlier Judges, **Lord Justice Lewison** referred them back to the Court in Cardiff on two matters – the presence of the Enterprise Zone and the Heritage issue.
- 1.3.16 On **June 28th 2017** the Planning Inspectorate conceded these points; Mr Nixon's decision was quashed by the Administrative Court on **5th July 2017**.
- 1.3.17 A second Public Inquiry with a new **Inspector, Ms Kay Sheffield**, was then held for four days at Angle Village Hall in **December 2017**, considering the same 5 x 100m turbines. CPRW again appeared as a Rule 6 Party: its evidence was summarised by the Inspector at her paras 167 – 179:

'This is an unjustified location for a proposal of this size and nature' ... with 'adverse impacts on the landscape within and outside the PCNP and on visual, recreational and residential receptors' ... 'The proposal is unacceptable. It cannot be justified by using the type of special circumstances under which the refinery was established fifty years ago as an excuse to justify this entirely different development'.

- 1.3.18 Inspector Sheffield's Report APP/N6845/A/15/3025045 was issued on **26th January 2018**, again recommending that the appeal be dismissed and with key observations and conclusions similar to those made by Inspector Nixon:

243. Whilst the presence of the refinery close to the appeal site is a significant factor in terms of the baseline situation against which the proposal must be assessed, I do not find it a convincing reason for the proposed wind farm. The visual and spatial character of the proposal is very different from the refinery and the characteristics of the turbines together with their number, position and spread across the landscape would result in a substantial and distinct new development. From many of the vantage points the development would appear not as a consolidation of the refinery but as a separate entity, considerably extending and spreading the built form into and across the adjacent countryside.

245. *The evidence leads me to conclude that the proposed development would have a significant and adverse visual effect on the character and appearance of the landscape of the PCNP.*

246 *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 PCNP.*

271. *In conclusion the harm caused by the development to the setting of St Decumanus Church together with the listed cross shaft and church hall would be substantial ...*

298. *The proposed development would cause substantial harm to landscape character and visual amenity in respect of significant parts of the nearby PCNP. The existence of the refinery close to the site does not alleviate this visual harm, instead the proposal would substantially extend the current envelope of prominent development away from the Haven Waterway and into the relatively narrow buffer of countryside bordering the PCNP. The scheme would have a visually harmful effect, rather than one of beneficial co-location.*

304. *... On balance I consider that the harm which would be caused by the development clearly outweighs the benefits it would bring.*

1.3.19 The Inspector's recommendation to dismiss the Appeal was then accepted by **Lesley Griffiths**, the Welsh Government's Cabinet Secretary for Energy, Planning and Rural Affairs on **20th April 2018**, over four years after the original planning application was made.

1.3.20 Nonetheless, RWF applied to the High Court for leave to Appeal against the Welsh Minister's Decision. Their submission to the High Court was further refused by **Mr Justice Garnham on 2nd August 2018** as '*no more than disagreement with the planning judgement made by the Inspector and the defendants*' and was '*totally without merit*' [twice].

1.3.21 Finally, RWF approached the Court of Appeal for permission to appeal the Welsh Ministers decision further, but were refused by **Lord Justice Sales** on **12th September 2018** (case reference C1/2018/11764) which concluded that '*There is no real prospect of success on appeal, and no other compelling reason to grant permission to appeal*'.

1.3.22 This marked the point at which RWF began to accept that the 5 x 100m layout might never be going to succeed. They had two options. One was to accept that the Angle peninsula was intrinsically unsuited for an array of modern wind turbines for reasons which had been repeatedly articulated by decision makers. The other was to try again with a new formula.

2 The current proposal

2.1 Practicalities

2.1.1 RWF initially applied to PEDW under the DNS procedure for 5 more powerful and larger 3.6MW turbines, raising the total MW capacity from 12.5MW to 18.0MW – and increasing the tip-height from 100m to 126.5m. After responses from consultees, they withdrew that option, and limited the scheme to 3 but even larger machines, responding to the need to reduce (though not eliminate) impacts on heritage assets at St Decumanus Church.

2.1.2 In comparing potential impacts it is important to note that in combination with hub-height, the 'blade-swept area' is not just the essential power-generating characteristic of any wind turbine, but also the main characteristic which accounts for visual and other impacts. Although it is possible to discern the landscape behind or through the rotating blades, the movement produces visually impaired space for the swept area and is a visual intrusion in the perception and experience of essentially rural landscapes and views. This effect is quantified by the familiar formula πr^2 , where $\pi = 3.1416$ and r is the radius described by the turbine blade, as calculated in the Table below.

2.1.3 The usefulness of this concept has long been endorsed by Inquiry decisions, as in respect of 4 x 40m bladed turbines at Mynydd y Gwrhyd (APP/Y6930/A/05/1189610) where in 2005 Inspector David Sheers reviewed the potential visual impact of various comparable projects in the locality, referring to the relationship between an increase in the swept area of the blades and the potential for greater visual intrusion. He concluded that:

[17] As a result the swept area of the moving blades would be significantly larger, with the potential for greater visual intrusion than almost any other in Wales. Each of the proposed wind turbines would have a blade swept area of just over 5000m² compared with just over 3000m² for those at Ffynnon Oer and only 1075m² for those at the Taff Ely wind farm.

2.1.4 Summarised history and key characteristics

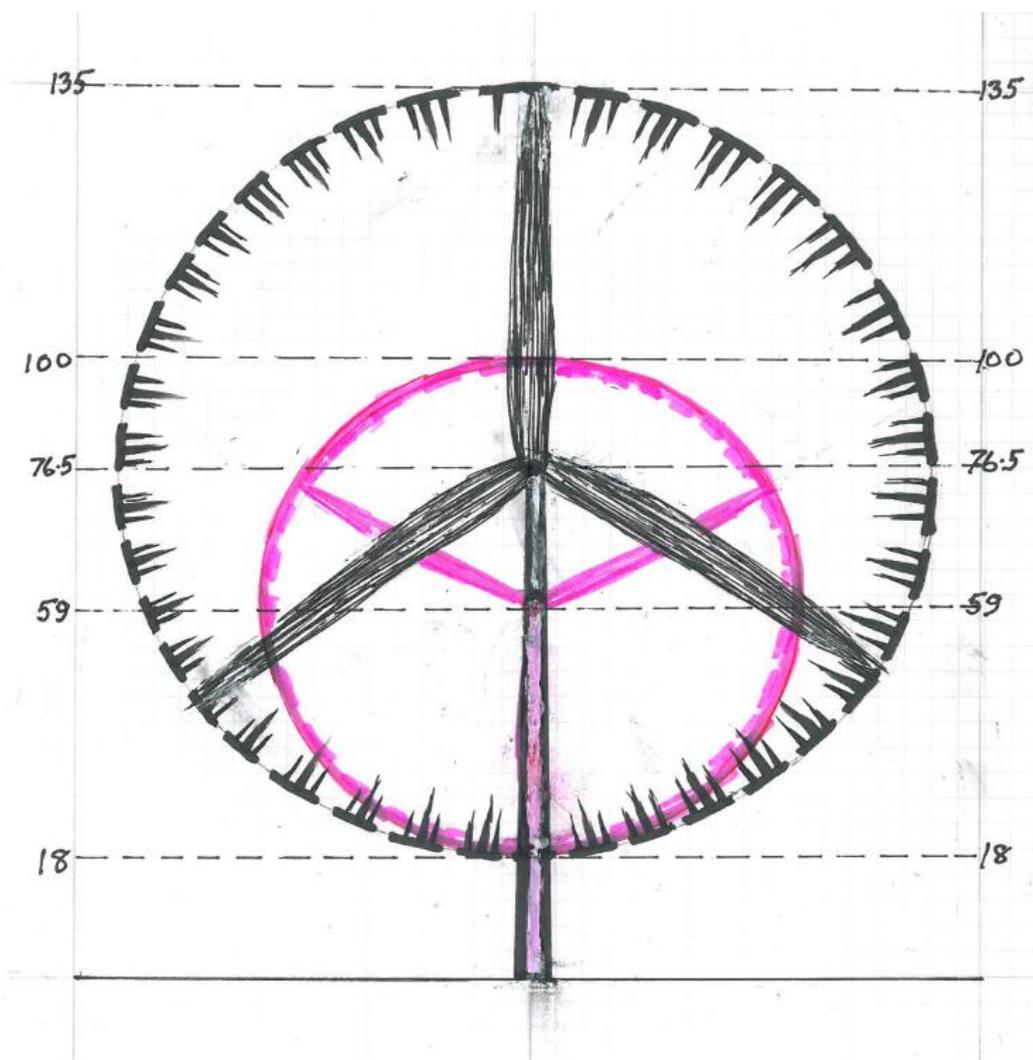
| | date | Turbines | Hub (m) | Tip (m) | Blade (m) | Blade Sweep (m ²) | Total Blade Sweep (m ²) | MW per turbine | MW total |
|-----------------------|--------------------------------------|----------|-------------|------------|-------------|-------------------------------|-------------------------------------|----------------|-------------|
| PCC Refused | 15 Jan 2014 | 5 | 59 | 100 | 41 | 5,281 | 26,405 | 2.5 | 12.5 |
| PI 2015 Alwyn Nixon | 4 Feb 2016 Dismissed [quashed] | | | | | | | | |
| PI 2017 Kay Sheffield | 26 Jan 2018 Dismissed | | | | | | | | |
| DNS initial | [Withdrawn] | [5] | [69] | [126.5] | [57.5] | [10,387] | [51,935] | [3.6] | [18.0] |
| DNS current | Nov 2021 | 3 | 76.5 | 135 | 58.5 | 10,751 | 32,254 | 4.3 | 12.9 |

2.1.5 By using three but more powerful 4.3MW machines, RWF have barely increased the total generating capacity over the original 5-turbine scheme – 12.9MW rather than 12.5MW. Moreover, in the process they have significantly increased the tip height of each from 100m to 135m, and have thus more than doubled the blade-swept area of each from 5281m² to 10,751m². As a result, the total blade-sweep from the 3 turbines has actually gone up from 26,405m² in the original 5-turbine scheme to 32,254m² – an increase of 22%.

2.1.6 The additional potential impact of the proposed turbines is even greater than the statistics would suggest. Both the 100m and the 135m turbines have blades which at their lowest point sail only 18m above the ground.

| | Tip (m) | Hub (m) | Blade (m) | Hub minus blade = height above ground |
|--------------------|------------|-------------|-------------|---------------------------------------|
| Previous proposals | 100 | 59 | 41 | 18 |
| DNS current | 135 | 76.5 | 58.5 | 18 |

This means, as shown in the following sketch, which is based on ES Figure 1.3, that the extra sweep of the proposed turbines' blades (in black) **is above - i.e. higher and wider than that of the original machines** (in pink). Given that the overall blade sweep from just the 3 turbines is 22% greater than that from the previous 5, this is a salient factor in assessing their impact.



- 2.1.7 ES chapter 3 ‘Project Description’ describes the ‘Proposed Turbines’ at 3.16 to 3.20 (pp36-38) and gives rudimentary dimensions, but makes no mention of the key characteristic of their blade-swept area. Neither does it provide any information about how their size and dimensions compare with the previous application(s) for 100m machines.
- 2.1.8 ES Chapter 5 ‘Landscape, Seascape & Visual Amenity’ states at 5.2 that the turbines are ‘*described in section 5.7*’, but there seems not to be such a subdivision in the ES, whilst para 5.7 is merely a reference back to the consultation process. This material is no more explicit than ES chapter 3.
- 2.1.9 ES Technical Appendix 5.1 – LVIA Assessment Criteria – contains material related to ‘*large scale wind turbines*’ but there is no indication there as to what size-range constitutes this characteristic. The Tables are:
- A5 1.2 Landscape Susceptibility to Large Scale Wind Turbines
 - A5 1.3 Landscape Sensitivity to Large Scale Wind Turbines
 - A5.1.8 Receptor Location Sensitivity to Large Wind Turbines
- Given the considerable increase in turbine size and swept area since the previous proposal, this is unhelpful without any indication as to how the 135m machines fit in the definition.

2.2 RWF’s Assessment of Visual Effects

- 2.2.1 As in the 2016 application for 5 x 100m turbines (see the Public Inquiry outcome summarised at 1.3.17 – 18 above) RWF’s landscape and visual evidence was compiled by Ms Kay Hawkins, an experienced consultant in this field. Although she correctly appraised landscape effects on relevant spatially distinct areas (and does so again) her individual viewpoint (VP) assessments provide a convenient and representative basis to compare her current equivalent assessment with its predecessor ⁽¹⁾. It should be noted that at the 2016 Inquiry I gave evidence for CPRW submitting that in certain respects, Ms Hawkins’ assessments were overly cautious. Notwithstanding that, my purpose in this submission is simply to set out the conclusions of her viewpoint assessment in 2016 alongside that now provided: in other words, to compare ‘like with like’ in a convenient but representative format.
- 2.2.2 In so doing I accept that in many instances Ms Hawkins has understandably reflected the reduced array width caused by the reduction from 5 to 3 turbines, but I find it difficult to accept that her conclusions (which as can be seen below generally find a reduced magnitude and a reduced effect on views) do not refer to and seem not to reflect the increase in turbine size and swept-area characteristics that I have set out in section 2.1 above.
- 2.2.2 The tabulation below therefore refers to those current viewpoints which are from equivalent locations to those Ms Hawkins assessed previously, with conclusions of receptor sensitivity, magnitude of change and effect on views. These are produced in the ES volume III Technical Appendix 5.5 ‘Viewpoint Analysis’ which I have used as a framework for comparison. The terminology follows her methodology which she sets out in the ES. I have indicated by use of symbols where her current assessment differs from that in 2016.

(1) If this proposal becomes subject to a Public Inquiry, CPRW would wish to submit a more fully-fledged critique.

2.2.3 Comparative Viewpoint assessments

The comparative Table below sets out Ms Hawkins' findings as presented in the current ES **in red**. The results for the 20 equivalent (but differently-numbered) viewpoints in her 2016 Inquiry evidence are shown below them **in black**. The equals sign indicates where the present assessments for 2021 have not changed from 2016. In all cases the receptor sensitivity has remained unchanged. Magnitude and Effect levels have also remained the same for the three closest VPS 01, 03 and 04, but for 14 of the remaining 17 locations she has assessed a lower level of magnitude and consequently a reduced effect on views.

VP 2021 Numbers in **bold** = 2016 equivalents in [VP]

| VP | Receptor sensitivity | Magnitude of change | Effect on views |
|------------------------------|----------------------|------------------------------------|----------------------------------|
| 01 0.3km [VP1] | High/Medium | Very Subst/ Subst | Major |
| | = | = | = |
| 03 1.0km [VP2] | High/Medium & Low | Substantial | Major/Mod+ & Moderate |
| | = | = | = |
| 04 1.4km [VP3] | High | Substantial/ Moderate | Major/ Moderate+ |
| | = | = | = |
| 05 1.4km [VP4] | High/Medium | Substantial/Moderate & Moderate | Major/Moderate & Moderate+ |
| | = | Substantial & Substantial/Moderate | Major/Moderate+ & Major/Moderate |
| 06 1.4km [VP6] | High/Medium | Moderate | Major/ Moderate see footnote |
| | = | Substantial/Moderate | Major/Moderate |
| 07 1.5km [VP5] | High/Medium | Substantial/ Moderate | Moderate/ Major |
| | = | Substantial | Moderate/Major+ |
| 08 3.1km [VP7] | High & High/Medium | Moderate / Slight | Moderate+ & Moderate |
| | = | Moderate | Major/Moderate & Moderate+ |
| 10 3.9km [VP8] | High & Medium | Slight | Moderate & Moderate/Minor |
| | = | Moderate/Slight | Moderate+ & Moderate/Minor+ |
| 12 3.9km [VP9] | High | Moderate / Slight | Moderate+ |
| | = | Moderate | Major/Moderate |
| 13 4.4km [VP10] | High & High/Medium | Moderate / Slight | Moderate+ & Moderate |
| | = | Moderate | Major/Moderate & Moderate+ |
| 14 4.5km [VP11] | High | Moderate / Slight | Moderate+ |
| | = | Moderate | Major/Moderate |

| | | | |
|------------------------------|----------------------|---------------------|-----------------------------------|
| 15 5.1km [AV1] | High | Moderate / Slight | Moderate+ |
| | = | Moderate | Major/Moderate |
| 17 6.6km [VP12] | High & Medium | Slight | Moderate & Moderate/Minor |
| | = | Moderate/Slight | Moderate+ & Moderate/Minor+ |
| 18 6.6km [VP13] | High & High/Medium | Slight / Negligible | Moderate/Minor + & Moderate/Minor |
| | = | Moderate/Slight | Moderate+ & Moderate |
| 20 9.1km [VP15] | High & Medium | Slight | Moderate & Moderate/Minor |
| | = | = | = |
| 21 9.4km [VP14] | High | Slight | Moderate |
| | = | = | = |
| 22 9.4km [VP C] | High | Slight / Negligible | Moderate/Minor+ |
| | = | Slight | Moderate |
| 23 [VP16] 9.4km | High/Medium & Medium | Slight / Negligible | Moderate/Minor & Minor+ |
| | = | Slight | Moderate/Minor+ & Moderate/Minor |
| 24 9.4km [VP A] | High | Slight / Negligible | Moderate/Minor+ |
| | = | Slight | Moderate |
| 25 9.4km [VP B] | High & High/Medium | Slight / Negligible | Moderate/Minor+ & Moderate/Minor |
| | = | = | = |

Footnote – VP06 above is assessed as having a reduced magnitude in 2021 but not a reduced effect. This may be due to an error in compiling the ES Table.

3 Conclusion

CPRW notes and supports the submission from The Friends of the Pembrokeshire Coast National Park, which refers to many of the points covered above and urges rejection of the application. It also discusses the policies in the Welsh Government's Future Wales: The National Plan 2040 in which in Policies 17 and 18 do not lend any support to this proposal and contain a policy commitment to protect nationally-designated areas and their settings.

In view of the evidence presented above, the adverse impacts of the proposal are greater than indicated by the applicants and should be judged in relation to the long catalogue of rejection of less ambitious projects on this site. They are sufficient to outweigh its benefits.

CPRW submits that the Application should be refused [again] .