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Ysgrifennydd y Cabinet dros Ynni, Cynllunio a Materion Gwledig  
Cabinet Secretary for Energy, Planning and Rural Affairs



Llywodraeth Cymru  
Welsh Government

Ein cyf/ Our ref: qA1320857

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20 April 2018

Dear Mr McKinney

**TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 78  
APPEAL BY RHOSCROWTHER WINDFARM LIMITED FOR THE ERECTION OF  
FIVE WIND TURBINES WITH A MAXIMUM TIP HEIGHT OF 100M TOGETHER  
WITH ANCILLARY DEVELOPMENT COMPRISING SUBSTATION, CONTROL  
BUILDING, NEW AND UPGRADED ACCESS POINT AND TRACKS,  
HARDSTANDING AND TEMPORARY CONSTRUCTION COMPOUND WITH  
ASSOCIATED WORKS AT LAND SOUTH OF VALERO, EAST OF  
RHOSCROWTHER, REFINERY ROAD, HUNDLETON, PEMBROKESHIRE.**

1. Consideration has been given to the report of the Inspector, Kay Sheffield BA (Hons) DipTP MRTPI, who held an Inquiry for your client's appeal against Pembrokeshire Council Council's ("the Council") refusal of planning application 13/0876/PA to "construct and operate 5 wind turbines with a maximum tip height of 100 metres together with ancillary development comprising substation, control building, new and upgraded access points, access tracks, hardstanding and temporary construction compound and associated works" on land south of Valero and east of Rhoscrowther, Refinery Road, Hundleton, Pembroke, Pembrokeshire.

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

2. On 19 May 2017, in accordance with section 79 and paragraph 3(1) of Schedule 6 to the Town and Country Planning Act 1990 ("the 1990 Act"), the appeal was recovered for determination by the Welsh Ministers. All appeals which fall within the categories and thresholds of the new Developments of National Significance process are now recovered for determination by the Welsh Ministers. Regulation 4A of the Developments of National Significance (Specified Criteria and Prescribed Secondary Consents) (Wales) Regulations 2016, as amended by the Developments of National Significance (Specified Criteria and Prescribed Secondary Consents) (Wales) (Amendment) Regulations 2016 specifies the construction of an onshore wind generating station which is expected to have (when constructed) an installed generating capacity of 10 megawatts or above is of national significance. The development, the subject of the appeal, for 5 wind turbines with an installed capacity of 12.5MW falls within this criterion.
3. Under the provisions of the Government of Wales Act 2006 the power to determine applications under section 79 of the 1990 Act has been transferred to the Welsh Ministers, these functions are within the portfolio of the Cabinet Secretary for Energy, Planning and Rural Affairs and have been exercised by me as Minister.
4. In exercising their functions as part of carrying out Sustainable Development in accordance with the Well-Being of Future Generations (Wales) Act 2015 ("the WFG Act"), section 2 of the Planning (Wales) Act 2015 requires the Welsh Ministers, as a public body, to ensure the development and use of land contributes towards improving the economic, social, environmental and cultural well-being of Wales. In order to act in this manner, the Welsh Ministers have taken into account the ways of working set out in section 4 of 'SPSF1: Core Guidance, Shared Purpose: Shared Future – Statutory Guidance' on the WFG Act through examination of the appeal by way of an Inquiry in accordance with the Town and Country Planning (Inquiries Procedure) (Wales) Rules 2003.
5. The Inspector opened an Inquiry into the appeal on 5 December 2017 which sat for four days. A site visit was carried out on 9 January 2018.
6. The Inspector recommends the appeal is dismissed and planning permission refused. A copy of the Inspector's report (IR) is enclosed. All references to paragraph numbers, unless otherwise stated, are to the Inspector's report.

## Main Issues

7. In the Inspector's view, the main considerations in this appeal are the effect of the development on (IR217):
  - the landscape character and visual amenity of the area, with particular reference to the nearby Pembrokeshire Coast National Park (PCNP);
  - the setting of heritage assets in the area; and
  - whether any resulting harm in terms of these matters is outweighed by the benefits of the proposal particularly its contribution to energy generation from renewable sources and combating the effects of climate change.

### The effect on the landscape character and visual amenity of the area

8. The site lies outside, but close to the boundary of the Pembrokeshire Coast National Park (PCNP). Planning Policy Wales (PPW) states the duty to have regard to the statutory purposes of the National Parks applies to development whether the development lies within or outside the designated area (IR218).
9. The Inspector is satisfied the Landscape and Visual Impact Assessment (LVIA) included in the Environmental Statement (ES) and its addendum followed the methodological guidelines established by the Guidelines for Landscape and Visual Impact Assessment (GLVIA 3) and also drew on other sources of best practice. Whilst soundly based as regards its broad methodology and scope, the Inspector states Pembrokeshire County Council (PCC), the Campaign for the Protection of Rural Wales (CPRW) and the PCNP Authority disagree with a number of the conclusions reached in the LVIA concerning the extent and significance of the effects identified (IR219).
10. The site lies within a largely open and rural landscape which extends westwards from Pembroke to the Angle Peninsula. The Inspector considers the uncluttered, open character of the landscape is accentuated by the elevated nature of the principal routes which traverse the area. To the south and south west towards the coastline around Freshwater West the Inspector considers there is a sense of increasing wildness and remoteness. This area, together with the margins of Angle Bay and the Angle Peninsula lie within the PCNP. The Inspector considers the considerable presence of the refinery to the north of the site is in direct contrast to this. Further to the north and east and lining the south and north sides of the Haven Waterway are port and jetty facilities and other elements of energy related infrastructure including the wind turbines on the north side of the water at Wear Point, the power station and its associated pylons on the south side and areas of urban settlement. The Inspector states these elements form part of the baseline against which the proposal falls to be considered (IR220-221).

11. In LANDMAP (Natural Resources Wales' spatial landscape dataset) the site lies within the Castlemartin Visual and Sensory Aspect Area (VSAA) (VS061) which is valued as moderate, and described as "*a largely attractive rural landscape influenced by farming practices both historically and in the present*". "*Small villages and coastal influences*" add to its value whilst the "*impact of large pylons close to Pembroke and views of industrial plants to the North*" reduce it (IR130). The Inspector considers the LANDMAP designation of the site broadly reflects the rolling mosaic landscape within which the appeal site sits and which extends into the PCNP. It forms a rural buffer between the more wild landscape of the National Park and the urbanised elements of Milford Haven and its associated settlements. The Inspector notes, however, north of the appeal site, the rural buffer is interrupted by the refinery. She states although its location was justified by the exceptional deep water harbour facilities and overriding arguments regarding national economic interest, the refinery is a major industrial feature and its imposing presence contrasts dramatically with its essentially open and rural setting (IR223).
12. When seen from within the PCNP the refinery marks the presence of the Haven Waterway and the activities along its shores. The collection of tall towers, flare stacks and chimneys makes the complex highly visible in the landscape and due to the level of illumination throughout the refinery its presence is also marked during hours of darkness from numerous viewpoints. (IR224).
13. The Inspector is of the view, however, it is the taller elements of the refinery which draw the eye in the wider views from within the PCNP. These are concentrated within a relatively small part of the developed area of the complex, many of the structures being low level in comparison and hidden by the landform in many of the more distant views. The Inspector considers the impact and prominence of the refinery in the wider landscape is therefore derived primarily from a comparatively tight concentration of vertical elements which form an isolated skyline composition in stark contrast to its rural surroundings and the natural beauty of the PCNP (IR225).
14. The power station, port facilities and energy related infrastructure found concentrated along both sides of the Haven Waterway look towards and relate to the waterway. The Inspector acknowledges the chimneys to the power station and the associated power line pylons are established features in the landscape as are the turbines at Wear Point and others to the north of the Haven Waterway. It is also a fact these turbines and chimneys are visible in views of the appeal site. However the Inspector considers they appear in the background and in the context of a more industrialised landscape contained on the southern side of the Haven Waterway by the ridge marked by the road which runs between Rhoscrowther and Green Hill, past the site and the refinery. Views to the north are also confined by the waterway itself. This is a different landscape context from the appeal site which looks to and relates more closely with the rural valley and the PCNP beyond (IR226).

15. The former BP tank site, at the eastern end of Angle Bay is being actively returned to a natural state and no longer appears industrial in character. The Inspector is of the view the solar panel arrays at Hoplass and Wogaston Farms are low-profile energy installations and whilst they are visible in the landscape, the field pattern remains discernible. The Inspector considers the physical characteristics of these developments are quite different from those of the wind turbine scheme under consideration. She considers their effect on the character and appearance of the area to be quite localised in comparison with the turbines and overall the solar schemes have not significantly altered the landscape against which the appeal proposal has to be assessed (IR227).
16. It is not in dispute the turbines would have a significant impact on landscape character at ranges of up to 2km from the site. Detailed in the LVIA are several views close to the site namely view points (VP) 1, 4, and 6. The Inspector concludes the turbines would appear as prominent large objects spread across a substantial part of the field of view. Whilst the turbines would be seen in the context of the refinery, they would extend beyond the relatively constrained section occupied by the taller structures. Although the omission of turbine 4 would reduce the field of view, the Inspector does not consider the effect of the omission would make a significant difference to the dominance of the turbines in the landscape from these viewpoints (IR228).

*Views from Pembrokeshire Coast National Park*

17. From viewpoints in the PCNP along the B4320 to and from Angle the Inspector considers the turbines would appear as a prominent array across a substantial part of the field of view, where they would form a visually separate and distinct element from the refinery (VP 5). The Inspector is of the view although the power station chimneys, Wear Point turbines and outlying parts of the refinery are also seen, they are minor distant elements. The presence of the turbines would be emphasised by the rotating blades. The Inspector states the proposal would increase the presence of man-made industrial-scale elements in the landscape, spreading such visual influences significantly further across the landscape and towards the PCNP. Whilst the turbines would appear to be relatively evenly spaced, the Inspector considers the omission of turbine 4 would substantially increase the gap between the westward turbine and the remaining three (IR229).

### *Views from Pembrokeshire Coast National Trail*

18. The Inspector is of the view the turbines would also be prominent further south in views from the elevated B4319 road leading from Castlemartin to Freshwater West. This road is also part of the Pembrokeshire Coast National Trail (PCNT) and views of the turbines would be possible for much of the 2km stretch between West and Gupton Farms. The Inspector considers the view of open countryside to the north is essentially unbroken except for the refinery (VP 7). She states the rotating blades of the turbines would appear on the skyline to the east of the refinery creating a substantial additional intrusion into the rural landscape. It is acknowledged at different points along this road the view of the turbines would change and rather than be seen as a distinct and separate element in the landscape they may appear as an addition to the refinery. In both instances the Inspector considers the proposal would significantly increase the extent of development away from the taller elements of the refinery and into the countryside bounding the PCNP. Furthermore, the Inspector considers the omission of turbine 4 would extend the gap between the refinery and the development when they are seen as separate elements (IR230).
19. The PCNT follows the coastline around Angle Bay and the Inspector states the turbines would be seen as a prominent array of moving structures standing separately from the refinery (VP 3). It is acknowledged the turbines would be partially screened in places by the undulating topography and vegetation. It is also accepted the omission of turbine 4 would reduce the field of view. Nevertheless, the Inspector is of the view the development would introduce a substantial new industrial scale element into the backdrop of the bay (IR231).

### *Views from Old Point House and St Mary's Church*

20. The Inspector is of the view the turbines would also be seen as a prominent array of moving structures standing separately from the refinery, from The Old Point House and east of St Mary's Church (VP 9 and 11), with the bay in the foreground. Whilst the Inspector considers this has the effect of distancing the development so it appears to be within a different landscape, it would still introduce an array of prominent, large scale, man-made and moving structures into the narrow tract of rural landscape between the refinery and the PCNP. Due to the number and height of the turbines and the diameter of the blades the Inspector is of the view the development would be a prominent and distracting feature in the landscape (IR232).

### *Conclusion on landscape character*

21. The Inspector acknowledges the effect of the development on the character of the landscape would decline with distance and the site is close to the existing refinery which has an imposing presence of its own. However, she does not consider the visual characteristics of the development would have a complementary or consolidating relationship with the static and more tightly grouped composition of the stacks, towers and chimneys of the refinery. Instead the Inspector considers the development would compound the present level of visual intrusion and spread the influence of development across a significantly greater area, which would be at odds with the LANDMAP recommendation for this Visual and Sensory Aspect Area (VSAA) to "*prevent further encroachment of industrial works into the north of the aspect area.*" At the same time it would confuse the current simple contrast between the refinery and its rural setting as seen from the south, to the detriment of the character of the landscape (IR233).

### *Impact on residential properties*

22. According to the Residential Visual Amenity Assessment (RVAA) in the ES there are properties in ten locations within 1.5 km of the site which have the potential to experience significant visual effects from the proposal. Concerns regarding visual amenity were also raised by residents of properties on the western side of Angle Bay on the approach to The Old Point House, approximately 4km from the nearest turbine (IR234).
23. The Inspector states the visual effect of the development on each of the locations would depend not only on the distance from the turbines but also on the direction and extent of the view. Although all five turbines would be seen from most of the properties identified, the intervening topography and vegetation together with buildings would restrict the view of them. The extent of the array would limit the views of the turbines to one direction and some would include the refinery. This would not be the case from Pleasant View from where the main view is to the south and the refinery is behind it to the north. As recorded in the RVAA the occupiers of this property would have clear uninterrupted but oblique views of the five turbines which would appear as prominent moving structures upon an unconstrained horizon. Whilst the Inspector considers the omission of turbine 4 would reduce the field of view and in some instances remove blade overlap, overall she does not consider it would make a substantial difference to the overall impact (IR235).

24. The Inspector is of the view there will always be significant effects from wind farms and it is accepted there would be significant effects on the visual amenity of some residents in properties up to 4 km from the proposal. However, the test is whether the turbines would be present in such number, size and proximity where they would represent an unpleasantly overwhelming and unavoidable presence in main views from the property and its garden to the extent the property is likely to become unattractive and thus an unsatisfactory place to live. Based on the evidence, the Inspector does not consider this to be the case in this instance. However, the Inspector states if a contrary conclusion is reached and it is decided the change of view, particularly from Pleasant View could be described in these terms, such effects would fall to be weighed in the balance against the wider public benefits which the development is designed to achieve (IR236).

*Impact from local roads and rights of way*

25. For motorists and other road users the Inspector is of the view there would be significant changes in views from some of the local roads within 3 km of the site. The turbines would appear as prominent large objects spread across a substantial part of the field of view which would extend beyond the relatively constrained section occupied by the taller structures of the refinery. Depending on the time of year and the height of the roadside hedgerows, there could be sustained views of the turbines from these local roads which follow the ridgelines. The Inspector also considers the westward turbines would encroach in the vista towards the Angle Peninsula, extending the visual impact of the turbines towards the PCNP and the visual separation of the development from the refinery would increase. Furthermore, she is of the view the development would impinge to a greater extent on and harm the views of Angle Bay and the Angle Peninsula, although it is accepted this would be reduced by the omission of turbine 4 (IR237).

26. The turbines would also be seen largely against the backdrop of the refinery from the bridleway at Wogaston and to the north of the B4320. Although further away, the Inspector considers other industrial and energy related features of the Haven Waterway create a more industrialised character to the distant landscape. The view is from outside the PCNP and does not include the National Park except for a peripheral view of Angle Point and the Dale Peninsula, beyond which there would be no visual encroachment by the turbines. Given their relatively close proximity, the Inspector considers the turbines would be very prominent in this view. Nevertheless, the view from the bridleway is limited to an extent by the height of the hedgerows and she does not consider the effect of the development in visual terms would be major. Moreover, the omission of turbine 4 would significantly curtail the westward extent of the array with consequent reduction on visual impact (IR238).



27. The prominence of the development in the view from the B4319 Castlemartin to Freshwater West road has already been set out. It is a route not only used by motorists and walkers following the PCNT but also cyclists. The Inspector is of the view, whilst the refinery is visible on the skyline and the local topography would result in the turbines dropping out of sight at times, a view of them would be sustained for a lengthy stretch (IR239).

*Views from Angle peninsula and surrounding countryside*

28. The Inspector states when walking eastwards along the south side of the Haven Waterway from the north coast of the Angle Peninsula and around Angle Bay receptors on the PCNT would notice a significant change in some views as a result of the development. A similar view would be obtained from the elevated viewpoint at North Hill. The environs of Angle and Angle Bay are well visited and The Old Point House is a popular recreational destination. Whilst the Inspector accepts the turbines would not be visible from the confines of the main village, she considers the development would be harmful to views from the PCNT and the setting of Angle Bay generally (IR240).
29. Whilst a large part of the north side of the Haven Waterway is characterised by urban and industrial areas, progressing westwards within the PCNP the landscape becomes more rural and open and progressively more remote and distinct from the industrial areas to the east. The PCNT follows the coastline and from St Ann's Head views are obtained of the Angle Peninsula and from some vantage points include Angle Bay and Freshwater West. In these views the refinery appears as a prominent feature on the skyline on the far side of the waterway with the marine jetties in the middle distance, in strong contrast to the tranquil and unspoilt appearance of the adjacent landscape of the PCNP (IR241).
30. The Inspector is of the view the proposal would significantly extend the developed area of the refinery into the surrounding countryside. She accepts the turbines would appear as distant structures being over 7 km away and occupy only a small part of the field of view. However the Inspector considers their rotating blades would draw the eye and it is only this part of the structure which would be seen from St Ann's Head, Dale Waterfront and Castlebeach Bay. From these VP's the turbines would harm the coastal view and have a moderately adverse visual impact on this part of the PCNP. The Inspector considers no substantial change would result from the omission of turbine 4 (242).

*Overall conclusions on this issue*

31. The Inspector acknowledges 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, she does not find it a convincing reason for the proposed wind farm. The Inspector is of the view 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 Inspector considers 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 (IR243).
32. The Inspector states although in LANDMAP VSAA VS061 is evaluated as having a medium sensitivity to change, one of its recommendations is to prevent further encroachment of industrial works into the north of the aspect area. It is acknowledged the PCNPA Supplementary Planning Guidance indicates there may be limited opportunity for a single or small cluster (2 or 3) of medium or large (under 100m to blade tip) scale turbines on land close to existing oil refinery chimneys in order to provide a new point of focus. However, there is a requirement for any such turbines to be sited sensitively taking into account guidance set out in the SPG in respect of each Landscape Character Assessment (IR244).
33. The evidence leads the Inspector to conclude the proposed development would have a significant and adverse visual effect on the character and appearance of the landscape of the PCNP. In particular she considers this would be seen and experienced from areas to the south and west of the site and notably from the elevated routes along the B4320 to Angle and the B4319 between Castlemartin and Freshwater West as well as from Angle Point and Angle Bay together with significant lengths of the PCNT. The Inspector is of the opinion in these locations receptors would have a greater awareness and appreciation of the landscape and consequently be more sensitive to change whatever their mode of transport or purpose of their journey, to the detriment of their visual amenity (IR245).
34. The criteria which development proposals should satisfy, set out in Local Development Plan (LDP) Policy GN.1, relate to compatibility with context, avoiding significant harm to visual amenity, and protecting landscape character and quality, including the special qualities of the PCNP. The Inspector concludes the proposal would have a substantial harmful impact on the visual character and quality of the landscape, particularly in relation to the adjoining PCNP and the proposal, therefore, conflicts with Policy GN.1 of the LDP and national policy guidance in this respect (IR246).

35. The Inspector acknowledges the omission of turbine 4 would reduce the number of turbines visible in the landscape and from many vantage points it would reduce the width of the array. This would have positive consequences for some views from within the PCNP. However, the Inspector considers the reduction in the array width would not be sufficient to reduce the magnitude of change and it is unlikely the predicted extent of the significant effects would change as a result of removing turbine 4. The omission of turbine 4 would remove the overlapping of its blades with others at several VP's, including some within the PCNP. As a result the appearance of the proposal would be improved. It is only in respect of VP 5 the omission of turbine 4 would result in a gap in the middle of the cluster. However, the Inspector is not persuaded the effect of the omission of turbine 4 on landscape character and visual amenity would overcome the harm identified in respect of the appeal scheme (IR247).
36. On this particular main issue, I have no reason to disagree with the Inspector's conclusion on the impact of the proposed development on landscape character and visual amenity.

**The effect of the development on the setting of heritage assets in the area**

37. The Inspector states, whilst the development would have no direct physical effect on any designated historic asset in the vicinity of the appeal site, there is a statutory duty to consider the potential harm to the assets, including their setting. The Inspector concludes the determinative issue is the degree of harm the development would have on the setting of the group of assets at St Decumanus Church. The Inspector has also covered the heritage assets about which Cadw raised particular concerns, namely Eastington Manor, Wallaston Round Barrows and Corston Beacon Round Barrow. She has also considered the other heritage assets mentioned in the evidence, but finds nothing which leads her to conclude the proposal would cause harm to the settings of these other assets to any substantive degree (IR248).

*Impact on Grade I St Decumanus Church*

38. The grade I listed St Decumanus Church stands within a walled churchyard, on rising land to the north of a stream which flows to Angle Bay and the assets of the church form an intimate group (IR249-252).
39. The Inspector states although the refinery lies a short distance to the north, the intervening and wooded valley side provides substantial screening and only glimpsed views of it are possible from within the churchyard. Whilst the mature trees also limit views towards the east, from within the churchyard and its immediate surroundings there are views of upper parts of the valley where the turbines would be located. The Inspector is of the view the location of the churchyard within the valley with outward views restricted by vegetation, together with the clearance of most of the nearby dwellings, creates a sense of enclosure and isolation (IR253).

40. The cross shaft is the oldest feature in the churchyard. It is considered to be Celtic in origin which indicates this was a place of early Christian worship. Its primary significance is it marks the site as a place of Christian worship before the current church was built. The relationship of the cross shaft with the church and the churchyard is an important aspect of its setting. The Inspector states the church is medieval, possibly of C13 origin with a C14 tower. The church remains a significant element of the historical and cultural fabric of the area as evidenced by its ongoing intermittent use, visitor book entries, inclusion in the Priors and Pilgrims Trail and connections with Waldo Williams (IR254).
41. The Inspector states part of the significance of the church is its connection with early Celtic Christianity, its medieval fabric which includes several internal medieval and post-medieval tombs, and its place at the heart of the historic community. The location of the church nestled in the valley does not make it an easily visible landmark when travelling over the land unlike other churches in the area which can be seen over long distances, but neither is the church readily spotted from the coast. The Inspector accepts a sheltered location may have been intentional in terms of security from coastal attack and it is noted other churches in the area which were similarly not prominent in the landscape. Nevertheless the Inspector is not persuaded the location of the asset close to a stream which gives access to the nearby coastline demonstrates a strong historical connection with the sea (IR255-258).
42. The Inspector states, whilst in longer distance views the church is seen nestled in the valley with the refinery as a dominant presence in the background, in closer views of the church the refinery is hardly seen and in its immediate environs its presence is hardly perceived. Historically the setting of the church has been its immediate spatial relationship with the buildings of the village. Over time the surroundings of the church have evolved and apart from the cross shaft and the church hall, very few buildings remain. Today the church and its churchyard sit in the base of a wooded valley in surroundings which create an intimate and largely peaceful location.
43. Although the wider landscape has also changed and the refinery is an integral element within it, the Inspector considers the setting of the church continues to be its spatial relationship with its immediate surroundings within the valley. The Inspector is of the view the secluded location of the church within the valley with outward views limited to the upper slopes of the rural valley to the east together with the atmosphere this creates are part of the cultural heritage of the asset which people value and which are part of its significance (IR259-260).

44. Although the church hall stands within the churchyard, it is accessed from the road which abuts the churchyard wall on its eastern and northern sides. The hall continues to be used for events and in association with the church. The Inspector is of the view its main historical significance is, therefore, its role in the education of local children and at the heart of the historic community. Its position inside the churchyard is also an indication of its surviving importance at the heart of the wider community (IR261-262).
45. The Inspector is of the view the development would introduce new modern structures into the rural surroundings of the church. The nearest turbine would be approximately 700m from it. It is accepted from various vantage points both within the churchyard and its immediate surroundings, views of the turbines would be screened by vegetation. However, the Inspector states, from the pathway leading from the north gate to the church and looking towards the cross shaft and the church hall, a large part of turbine 4 and the upper blade of turbine 5 would be visible above the roof to the hall and the background vegetation. Although it would be a peripheral view, from the roadway just outside the north gate turbine 4 would be seen on the skyline above the churchyard's valley setting. Also from the southern part of the churchyard, the visualisations indicate the hub and rotor blades of turbines 1 and 2 would be seen behind the church hall and the south gate (IR263).
46. The Inspector acknowledges in entering the churchyard from the north gate the church is immediately in front of you and, as the turbines would be to the east, they would not be in direct line of sight. However, she considers turbines 4 and 5 would feature in the only view of the surrounding rural countryside which would also feature the cross shaft and the church hall in the foreground. The turbines would also be seen in other views from within the churchyard. The Inspector considers the turbines would have a pervasive presence and would be perceived from within the churchyard as a prominent and distracting feature which would detract from the tranquil setting of the church and intrude upon the grouping of the church, cross shaft and the church hall. The Inspector considers this would harm the setting of the heritage assets and in turn their significance. Whilst the omission of turbine 4 would reduce the harm, the Inspector is not persuaded it would be sufficient to reduce it to acceptable levels (IR264).

#### *Impact on Eastington Manor*

47. Eastington Manor, a Scheduled Ancient Monument (SAM) and grade I listed building, comprises a fortified stone medieval tower house built in the C15. It was formerly attached to a large house on its western side, some of the remains of which are still visible. Attached to the eastern elevation of the tower is Eastington Farmhouse, built in the C18 century which is grade II listed. The assets are located approximately 500m north west of St Decumanus Church and occupy a south west facing slope overlooking Angle Bay. They are experienced and understood as part of the historic complex of farm buildings situated on rising land above the bay (IR265).

48. The Inspector states, however, their setting is heavily influenced by the presence of the refinery on higher land to the rear which dominates all but close distance views of the buildings. Notwithstanding this, the principal aspect of the assets is not towards the appeal site and although the nearest turbine would be approximately 1 km away, due to the intervening landform the turbines would not be prominent in views from or towards these heritage assets. Therefore, the Inspector is of the view although the turbines would be visible in views of the assets, such views are limited and already influenced by the dominating presence of the refinery. Given the already much altered setting of the assets at Eastington Manor and the nature of the views towards the turbines the Inspector considers the impact on heritage significance would be low adverse (IR266).

*Impact on Wallaston Round Barrows and Corston Beacon Barrow*

49. Wallaston Round Barrows SAM is a group of four prehistoric burial mounds located in pasture land to the south of Wallaston Farm. The Inspector confirms only one of the barrows can be easily identified on the ground and, therefore, these features are hard to identify in longer distance views. Their significance lies primarily in their form, landscape setting and archaeological value. The Inspector is of the view the presence of the turbines would not interfere with or obscure any relationships with other features of the same date or detract from the ability of the receptor to appreciate its significance (IR267).

50. Corston Beacon Barrow is a Bronze Age burial mound in an elevated position in a field to the south of the B4320 and approximately 2km to the south east of the proposal. There are no visible features in the surroundings which contribute to the significance of the SAM. Long distance views are substantially obscured by the large roadside hedge although the taller elements of the refinery are visible above it. Whilst the field in which Wallaston Barrows sits is visible from the asset, the Inspector confirms, as features in the landscape, they cannot be easily distinguished at this distance and intervisibility is therefore limited. Nevertheless, the Inspector considers the spatial relationship in the landscape between the SAMs is important to an understanding and appreciation of their heritage significance. From Corston Beacon the turbines would lie in the same direction of sight as Wallaston, the nearest turbine being approximately 2.2km from the former and 1.5km from the latter. The refinery is already a major feature in such views and although views of the turbines would be restricted to blade tips seen in front of or close to the chimneys and stacks of the refinery, they would be distracting features in the views of Wallaston from the vicinity of Corston Beacon. Given this, the Inspector concludes the scheme would have some impact on the setting of these assets (IR268-269).

*Impact on Registered Milford Haven Waterway Historic Landscape*

51. The development would occupy land within the Registered Milford Haven Waterway Historic Landscape. The ES concluded the overall impact of the development on the historic landscape would be slight. Having had regard to the overall diversity and industrial components of the designated area, and the relationship of the scheme to these industrial components, the Inspector concurs with the conclusion reached in the ES which states the implications for the Historic Landscape would be slight. On this basis the Inspector concludes the proposed development would not have significant negative implications in respect of the Registered Historic Landscape (IR270).

*Overall conclusions on this issue*

52. The Inspector is of the view, 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, the impact on Eastington Manor would be low adverse and there would also be adverse impacts on Wallaston Round Barrows and Corston Beacon Barrow. Whilst there would be no significant implications in respect of the Registered Milford Haven Waterway Historic Landscape and other heritage assets in the area, overall the Inspector concludes the proposal would have a significant adverse effect on the historic landscape, contrary to Policy GN.38 of the LDP and national policy guidance in this respect. This weighs against the appeal.
53. I have no reason to disagree with the Inspector's conclusion on the impact of the proposed development on the setting of heritage assets in the area.

**The benefits of the development**

54. The Inspector confirms the proposal would have a maximum generating capacity of 12.5MW and would deliver electricity from a low carbon renewable source sufficient for about 7000 homes throughout its operational life. It would also displace at least 14000 tonnes of CO<sub>2</sub> emissions from entering the atmosphere each year. This would be a substantial contribution towards energy production from renewable resources and the reduction in greenhouse gas emissions sought by the UK Government's energy policy and required by Welsh Government (WG) targets. Given the commitment of the UK and Welsh Governments to address climate change through, amongst other things, greater production of electricity from renewable sources, the Inspector considers the contribution which would be made by the proposed development would be significant (IR272).

55. The Inspector states, although the UK Government's stance on onshore wind proposals may have shifted, according to WG onshore wind remains a key factor in meeting its targets for future renewable energy production. It is noted recent figures indicate the targets set for 2020 will be met. The Inspector acknowledges, however, the target recently set by WG for the generation of 70% of electricity consumption from renewable energy by 2030 is a significant increase from the 30% required by 2020. Moreover, maintaining progress in electricity production from renewable resources is of increased importance due to the lack of progress in respect of heat and transport. On this basis the Inspector does not accept the need for new renewable energy electricity generation is diminishing (IR273).
56. The Inspector accepts Pembrokeshire is outside a Strategic Search Area (SSA) which are identified as areas most suitable for large wind farm developments. It is also accepted within Pembrokeshire there is a large number of renewable energy schemes, the impacts of which have been judged acceptable and which already contribute to renewable energy production and there are more to be built. However, there is no set cap or quota which applies to a given planning authority area, nor is there a set limit for the amount of electricity which should be generated from renewable sources. The Inspector states individual schemes must be judged on their merits and in the light of relevant policy and material considerations (IR274).
57. The connection to the local grid would take place on site and no significant highway works would be required. The Inspector considers these factors represent significant advantages in favour of the proposal. Benefits to the local economy would also accrue from the scheme during its construction and decommissioning as well as during the operational period in terms of local investment and jobs. It is acknowledged the number of jobs may be few and may not be filled from the local community. The Inspector states given the evidence for a continuing need to increase energy production from renewable sources and the WG commitment to and policy support for onshore wind energy proposals which are environmentally acceptable, the contribution the proposed development would make to energy delivery from renewable low carbon sources is an important consideration which carries significant weight in support of the appeal. The Inspector also states the omission of turbine 4 would reduce the contribution the scheme would make towards energy production and the displacement of CO<sub>2</sub> omissions (IR275-276).
58. I have no reason to disagree with the Inspector's conclusion on the benefits of the proposal particularly its contribution to energy generation from renewable sources and combating the effects of climate change.



### Other material considerations

59. The Inspector has considered the scheme in relation to the impact of the scheme on living conditions, noise, shadow flicker, television reception, tourism, biodiversity, health and safety, the impact on agricultural land, similar developments and the community benefits of the proposal. She has concluded the scheme is acceptable in relation to these matters and I have no reason to disagree with her conclusions in these respects (IR277-292).
60. There is no reason to disagree with the Inspector's conclusions on any of the above matters.

### Inspector's Overall Conclusions

61. The Inspector is of the view the proposed development would cause substantial harm to landscape character and visual amenity in respect of significant parts of the nearby PCNP. The Inspector considers 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 Inspector concludes the scheme would have a visually harmful effect, rather than one of beneficial co-location (IR298). I agree with the Inspector.
62. The statutory purposes of the National Park designation, in terms of conserving and enhancing its natural beauty, wildlife and cultural heritage, also fall to be considered. This duty applies to activities affecting the National Parks, whether those activities lie within or outside the designated area. In the light of this duty the Inspector attaches particular importance to the objective of protecting landscape character, quality and diversity in relation to the special qualities of the PCNP, as set out in criterion 3 of Policy GN.1 of the LDP. The Inspector is of the view the proposal would not satisfy this policy requirement (IR299). I have no reason to disagree with the Inspector on this matter.
63. In respect of the historic environment, the Inspector concludes the proposal would cause substantial harm to the setting of St Decumanus Church, the cross shaft and the church hall. She also considers there would be a limited adverse effect on the setting of Eastington Manor, Wallaston Round Barrows and Corston Beacon Round Barrow (IR300).

64. The Inspector has paid special regard to the desirability of preserving the setting of any listed building affected by the development and due to this statutory requirement the Inspector is of the view the substantial harm identified to St Decumanus carries particular weight. The lesser harm to Eastington Manor, Wallaston Round Barrows and Corston Beacon Round Barrow also weighs in the balance. Overall the Inspector considers the harm to the interests of heritage assets weigh significantly against the development. The Inspector concludes the proposal would conflict with Policy GN.38 of the LDP which seeks to safeguard the settings of sites and landscape of architectural and/or historical merit (IR301). I agree with the Inspector.
65. In light of the above, the Inspector concludes the development would fail to comply with Policy GN.4 of the LDP as the objective of delivering renewable energy development through environmentally acceptable solutions would not be achieved. In addition the development would not accord with Policy SP 16 which seeks to protect the landscape and natural and built environment of Pembrokeshire and adjoining areas (IR302). I agree with the Inspector.
66. The Inspector is of the view the proposal would bring substantial benefits arising from the delivery of electrical power from a low carbon renewable source equivalent to the consumption of about 7000 homes and the consequent reduction in CO2 emissions throughout the operational life of the development. It would also help substantially towards meeting Government targets in relation to these matters. The Inspector also acknowledges there are socio-economic benefits which would derive from the scheme, both locally and more widely across the county and beyond. These benefits are all important considerations, supported by the positive overall thrust of policy towards renewable energy production, including onshore wind and the Inspector attributes significant weight to them in support of the appeal (IR303).
67. However, on balance the Inspector considers the harm which would be caused by the development clearly outweighs the benefits it would bring. Whilst the Inspector acknowledges the omission of turbine 4 would reduce the level of harm, she does not consider it would be sufficient to outweigh the harm identified. Furthermore, it would result in the production of less electricity and would not achieve the reduction in the level of CO2 emissions estimated for the five turbine scheme. The Inspector has taken all other matters raised into account and finds nothing of any weight to justify altering her conclusion (IR304).
68. I remain committed to increasing renewable energy production in Wales. However, I recognise renewable generation must be in appropriate sites at an appropriate scale. I accept, in this case, the harm identified by the Inspector outweighs the benefit the proposal would bring in terms of renewable energy generation.

69. The Inspector has considered the duty to improve the economic, social, environmental and cultural well-being of Wales, in accordance with the sustainable development principle, under section 3 of the Well-being of Future Generations (Wales) Act 2015. Having concluded the harm which would be caused by the development clearly outweighs the benefits it would bring, the Inspector also finds the proposal fails to accord with the wide reaching aims and objectives of the Well-being of Future Generations Act (IR305).
70. The Inspector recommends the appeal be dismissed and planning permission be refused. I agree with this recommendation.

#### FORMAL DECISION

71. Subject to the comments at paragraphs 8 – 68 above, I agree with the Inspector's conclusions and her reasoning behind them and I accept her recommendation. Accordingly, I hereby dismiss this appeal and refuse planning permission to "construct and operate 5 wind turbines with a maximum tip height of 100 metres together with ancillary development comprising substation, control building, new and upgraded access points, access tracks, hardstanding and temporary construction compound and associated works" on land south of Valero and east of Rhoscrowther, Refinery Road, Hundleton, Pembroke, Pembrokeshire.
72. In reaching this decision, I have considered the duty to carry out sustainable development under section 2 of the Planning (Wales) Act 2015. The decision made accords with the sustainable development principle set out in the WFG Act 2015 and the well-being objectives of the Welsh Ministers in that it contributes to the objective to "build healthier communities and better environments" by protecting Wales' natural and built landscape and heritage.
73. A copy of this letter has been sent to Pembrokeshire County Council and to those persons and organisations who appeared at the Inquiry.

Yours Sincerely



**Lesley Griffiths AC/AM**

Ysgrifennydd y Cabinet dros Ynni, Cynllunio a Materion Gwledig  
Cabinet Secretary for Energy, Planning and Rural Affairs

Enc: Inspector's report, leaflet 'H' and leaflet 'HC'

