LLŶR FLOATING OFFSHORE WIND PROJECT

Llŷr 1 Floating Offshore Wind Farm

Planning, Design and Access Statement

August 2024

Prepared by: Llŷr Floating Wind Ltd

Document Status

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Prepared for	Llŷr Floating Wind Limited
Approved by	Jay Hilton-Miller

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Acronyms and Abbreviations

Acronym or Abbreviation	Definition	Acronym or Abbreviation	Definition
AONB	Area of Outstanding Natural Beauty	NPS	National Policy Statement
BEIS	Department for Business, Energy, and Industrial Strategy	NRW	Natural Resources Wales
DAS	Design and Access Statement	NSIP	Nationally Significant Infrastructure Project
DCO	Development Consent Order	PCC	Pembrokeshire County Council
DECC	Department of Energy and Climate Change	PCNPA	Pembrokeshire Coast National Park Authority
DNS	Development of National Significance	PEDW	Planning and Environment Decisions Wales
EIA	Environmental Impact Assessment	PPW	Planning Policy Wales
ES	Environmental Statement	PRoW	Public Right of Way
FW	Future Wales	PS	Planning Statement
GHG	Greenhouse Gas	SAC	Special Area of Conservation
GW	Gigawatt	SM	Scheduled Monument
Ha	Hectare	SPA	Special Protection Area
HRA	Habitat Regulations Assessment	SPG	Supplementary Planning Guidance
LDP	Local Development Plan	SSSI	Site of Special Scientific Interest
LPA	Local Planning Authority	TCPA	Town and Country Planning Act
MCAA	Marine and Coastal Access Act	WBFGA	Well-being of Future Generations Act
MPS	Marine Policy Statement	WNMP	Welsh National Marine Plan
MW	Megawatt	WTG	Wind Turbine Generator
OfECC	Offshore Export Cable Corridor	OnECC	Onshore Export Cable Corridor
PDE	Project Design Envelope		

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1. INTRODUCTION

1.1. Overview

1. This Planning, Design and Access Statement has been prepared by AECOM on behalf of Llŷr Floating Wind Limited (the Applicant) to support the applications for Section 36 Consent (under the Electricity Act, 1989) with the associated deemed planning permission pertaining to the onshore infrastructure, and a separate Marine Licence (under the Marine and Coastal Access Act, 2009). These consents are required to construct and operate the Llŷr 1 Floating Offshore Wind Farm, a test and demonstration development in the Celtic Sea with onshore infrastructure located within Pembrokeshire, Wales (the proposed Project).
2. This Planning, Design and Access Statement provides an overview of the proposed Project and associated potential impacts. Following consultation with Natural Resources Wales (NRW) and Planning and Environment Decisions Wales (PEDW), the design and access proposals for the proposed Project have been incorporated into this document which includes an overview of how the design has evolved in response to the Environmental Impact Assessment (EIA). A separate Design and Access Statement will therefore not be submitted.
3. The proposed Project comprises:
    - Up to ten floating Wind Turbine Generators (WTGs); demonstrating the use of new floating offshore wind technologies. These will be positioned in an Array Area located approximately 35 kilometres (km) (from the northeastern corner of the Array Area to Linney Head, the closest location on the coast of Pembrokeshire) in the Celtic Sea:
    - Up to two offshore export cables: and
    - Onshore supporting infrastructure comprising transition joint bays, the onshore export cable corridor (OnECC), substation and access routes located in Pembrokeshire, Wales.
4. The proposed Project aims to deliver a cost-effective development to enable the demonstration of new floating offshore wind technologies. This will provide validation of the technology proposition and establish a pathway to series production. The proposed Project will demonstrate innovative full-scale floating offshore wind technology to act as a pathfinder project, aiding the establishment and development of the UK floating offshore wind capability in the Celtic Sea. This will be in preparation for larger commercial opportunity for floating wind, not only within Wales and the UK, but the wider western European region.

1.2. Project Consents

5. The consenting framework for the proposed Project is comprised of:
    - **A Section 36 consent under the Electricity Act 1989:** to construct and operate an offshore generating station. The application will be submitted to PEDW who will be administering on behalf of the Welsh Ministers, the consenting authority for the Section 36 Application.
    - The associated onshore transmission infrastructure works are the subject of the deemed planning permission. Deemed planning permission will be sought from Welsh Ministers, through a direction under section 90(2) of the Town and Country Planning Act 1990 (TCPA), in alignment with the Section 36 consent, for the onshore works. The full detail of the development included within the deemed planning permission is provided in Section 3 below.
    - **A Marine Licence under Part 4 of the Marine and Coastal Access Act 2009 (MCAA):** to carry out certain activities in the marine environment, including construction works, depositing substances or articles and dredging. The Marine Licence application will be submitted to Natural Resources Wales Marine Licensing Team (NRW MLT) who will be

administering on behalf of the Welsh Ministers, the consenting authority for the marine licence.

1.3. The Applicant

6. The Applicant is a subsidiary of Floventis Energy Ltd, a joint venture formed in 2021 between the renewable energy project development company Cierco Ltd and SBM Offshore Ltd, a deep-water energy company. Floventis Energy Ltd are developing projects in both the Celtic Sea, UK and California, USA.

1.4. This Application

7. Detailed pre-application discussions have taken place with NRW and PEDW in relation to the validation requirements for the applications. The information submitted to inform the applications is summarised in **Table 1-1** below.

Table 1-1: Application documents

Document	Author	Contents
Location Plan	*AECOM*	*Plan showing the scheme boundary and any land controlled by the applicant.*
General Arrangement Plans	*AECOM*	*Set of plans showing the proposed Project substation layout and elements.*
Planning, Design and Access Statement	*AECOM*	*This document presents the planning context and need for the proposed Project and assesses how the proposed Project accords with relevant national, regional, and local planning policy. The document also shows the proposed measures to landscape the proposed Project.*
Environmental Statement (ES)	*AECOM, Floventis, Reading Agricultural Consultants, ABPmer Research and Consultancy Ltd, Coracle Archaeology, Pager Power Poseidon Aquatic Resource Management Ltd, Award Environmental Consultants and Hi Def Aerial Surveying Limited (full authorisation details provided within the Statement of Competence)*	*Volume one: The proposed Project* *Volume two: Terrestrial Environment technical chapters* *Volume three: Marine Environment technical chapters* *Volume four: Project-wide Effects* *Volume five: Figures* *Volume six: Appendices*
ES: Non-Technical Summary	*AECOM*	*The non-technical summary provides an overview of the EIA process and its findings.*
Consultation Report	*AECOM*	*Detailed report of all the consultation undertaken by the applicant prior to submission.*
Green Infrastructure Statement	*AECOM*	*This document presents the proposed Project approach to ecological mitigation; how it uses the DECCA (diversity, extent, condition, connectivity and aspects of ecosystem resilience) framework to support green infrastructure ecosystem resilience; how it has explored opportunities for incorporating green infrastructure; and achieved net benefits for biodiversity (NBB).*

1.5. Environmental Impact Assessment

8. The proposed Project is categorised as Schedule 2 development under the Marine Works (Environmental Impact Assessment (EIA)) Regulations 2007 (as amended) and the Electricity Works (EIA) (England and Wales) Regulations 2017 (as amended). Due to the type, scale, and location of the proposed Project, it is classed as EIA development. As such, an EIA is required, and an Environmental Statement (ES) has been prepared. The results of the EIA, as presented in the ES, have informed the content of this Planning, Design and Access Statement, and the two documents cross-reference each other where appropriate.

1.6. Purpose and Structure of the Planning, Design and Access Statement

9. This Planning, Design and Access Statement has been prepared to accompany the applications for; a Section 36 consent under the Electricity Act 1989 (with deemed planning consent); and a Marine Licence under Part 4 of the MCAA (2009). The Town and Country Planning (Development Management Procedure) (Wales) Order, 2012 (as amended) details the legislative requirements of A Design and Access Statement as follows,

   A design and access statement must:

   - *explain the design principles and concepts that have been applied to the development;*
   - *demonstrate the steps taken to appraise the context of the development and how the design of the development takes that context into account;*
   - *explain the policy or approach adopted as to access, and how policies relating to access in the development plan have been taken into account; and*
   - *explain how any specific issues which might affect access to the development have been addressed.*

10. The Planning, Design and Access Statement provides an appraisal of how the proposed Project performs when assessed against the planning policy framework at both a national and local level and should be read alongside all the other documents and drawings submitted in support of the application, the full list of documents submitted is detailed in **Table 1-1**.

11. The remainder of this Planning, Design and Access Statement is set out as follows:

    - **Section 2: The Need for and Benefits of the proposed Project** summarises the context for the proposed Project, including a summary of the need for and benefits of the floating offshore wind development.
    - **Section 3: Site and Context** describes the existing land uses and characteristics of the application site including planning history and national and local designations of the site and surrounding area.
    - **Section 4: The Proposed Project** describes the proposed Project in detail.
    - **Section 5: Design Development** and Interpretation presents an overview of the design evolution of the proposed Project.
    - **Section 6: Consultation** presents an overview of the consultation held prior to submission.
    - **Section 7: Planning Legislative and Policy Context** outlines the decision-making framework, planning policy context for the proposed Project and other legislation and policy considered to be important and relevant.
    - **Section 8: Planning Appraisal** explains the impacts of the proposed Project by topic and the proposed Project's compliance with planning policy considered to be important and relevant in the decision making: and

- **Section 9: Conclusion and Planning Balance** presents the overall planning balance and conclusions of this Planning, Design and Access Statement.

2. THE NEED FOR AND BENEFITS OF THE PROPOSED PROJECT

2.1. Introduction

12. There is an urgent need to generate electricity using renewable and low carbon sources to provide sufficient, reliable and affordable sources of electricity which will support achieving defined carbon reduction targets. A growing impetus for developing sources of energy generation from wind is reflected in recent policy and legislation, discussed further below.

13. This section outlines the legislative framework that underpins the European, National and Local policy support for the move towards decarbonisation through the development of renewable and low carbon energy infrastructure.

2.2. Climate Change Legislation

14. As discussed within **ES Chapter 02: Legislation Policy and Guidance,** the UK government, through the Climate Change Act 2008, made the UK the first country in the world to set legally binding carbon budgets, which aimed to cut UK emissions (set against 1990 baselines) by 34% by 2020 and at least 80% by 2050. To achieve this, investment in energy efficiency and clean energy technologies such as renewables, nuclear, and carbon capture and storage is required. The Climate Change Act has been further underpinned by subsequent legislation and policy measures.

2.3. Welsh Net Zero Legislation

15. The Welsh Government has a central role in addressing climate targets, by legislating to reduce greenhouse gas (GHG) emissions to net zero by 2050 in Wales:

- **The Environment (Wales) Act, 2016:** requires Welsh Ministers to prepare and publish a report for each budgetary 5-year period setting out their policies and proposals for meeting the carbon budget for that period. In March 2019, the Welsh Government published Prosperity for All: A Low Carbon Wales plan which set out the first carbon budget (2016-2019) and the 2020 interim target. The Environment (Wales) Act, 2016 sets out the requirement for the sustainable management of natural resources together with new ways of working to achieve this.

- **The Well-being of Future Generations Act, 2015 (WBFGA):** The WBFGA has set seven goals for improving well-being in Wales. Tackling and adapting to climate change is integral to meeting those goals. Through its well-being objectives, the Act sets an agenda for sustainable development. The WBFGA's seven well-being goals are listed below and an appraisal of the proposed Project against these goals is provided within section 8 of this Planning, Design and Access Statement:

    1. A prosperous Wales
    2. A resilient Wales
    3. A healthier Wales
    4. A more equal Wales
    5. A Wales of more cohesive communities
    6. A Wales of vibrant culture and thriving Welsh language; and
    7. A globally responsible Wales.

- **Net Zero Strategic Plan, 2022:** Following on from Prosperity for All: A Low Carbon Wales, the Net Zero Wales 2021 plan comprises the Welsh Government's second emissions reduction plan for Carbon Budget 2 (2021 to 2025). The Plan has set an ambition for the

Welsh public sector to collectively reach net zero by 2030 (Welsh Government Net Zero Strategic Plan, 2022).

2.4. The Need for Wind Energy Generation

16. The British Energy Security Strategy: secure, clean and affordable British energy for the long term (2022) sets out the Government's high-level plan for providing our own clean, affordable, secure power and to reduce our dependence on foreign sources. The Strategy notes that accelerating the transition away from oil and gas depends critically on how quickly we can roll out new renewable generation.

17. The British Energy Security Strategy identifies an ambition to deliver up to 50 GW of offshore wind by 2030, including up to 5 GW of innovative floating wind. This increase in renewable energy generation is considered a primary method of reducing GHG emissions and the increased investment in floating offshore wind will put the UK at the forefront of floating offshore wind technology.

18. Future Wales: The National Plan 2040 (2021) addresses key national priorities for Wales, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, and improving the health and well-being of our communities. Outcome 11 of Future Wales states that,

    'decarbonisation commitments and renewable energy targets will be treated as opportunities to build a more resilient and equitable low-carbon economy.'

19. Further, Future Wales aims to ensure that the planning system will help Wales to lead the way in promoting and delivering a competitive, sustainable decarbonised society.

20. The Welsh Governments, Welsh National Marine Plan, 2019, sets out two specific objectives:

    - **Objective one**: to contribute to the decarbonisation of our economy and to our prosperity by increasing the amount of marine renewable energy generated, through supporting further commercial deployment of offshore wind technologies at scale over the lifetime of the Plan.
    - **Objective two:** to develop Wales as an exemplar of marine renewable energy technology by developing the essential skill base, infrastructure and technical knowledge to support the development of the industry over the next 20 years.

2.5. The Benefits of the Proposed Project

21. The aims of the proposed Project are to:

    - Demonstrate innovative full-scale floating offshore wind technology solutions with a turbine capacity greater than 12 MW in UK waters.
    - Optimise the design of floating offshore wind arrays to reduce the costs of large-scale floating offshore wind developments within the UK.
    - Contribute to the accelerated development of the UK's floating offshore wind industry as a pathfinder project, piloting the development, construction, installation, and operation of floating offshore wind on a large scale in UK waters.
    - Contribute to the learning of how floating wind interacts at a large scale with the natural environment and local interests, to better understand the benefits and challenges and to identify opportunities to enhance the local environment; and
    - Identify and maximise the potential opportunities and benefits to the local UK supply chain and employment.

22. By unlocking and exploiting higher energy capacities from deeper waters, further offshore than the typical limits of fixed bottom foundation offshore wind farms, the proposed Project will not only help the UK meet its target for net zero emissions, but it will create new opportunities for regional supply and manufacturing chains as global demand for offshore wind technologies rise.
23. In fulfilling the project aims, the proposed Project will deliver on the following key benefits:

    - New Energy Infrastructure: The proposed Project will support the nationally identified need for renewable energy generation, it is anticipated that it will generate enough renewable electricity to power around 100,000[1] homes.
    - New Electricity Generation Technology: The proposed Project is a flagship development consisting of innovative floating offshore wind technologies. The proposed Project represents an opportunity to demonstrate new floating offshore wind technologies to the rest of the world by 2030.
    - Local Community Benefits: **Chapter 16: Socio-economic, Recreation and Tourism** of the ES identifies that the proposed Project will deliver approximately 2,165 FTE jobs during construction and there are anticipated to be 96 gross direct FTE jobs created from the operation phase of the two 100 MW substations (i.e. Llyr 1 and Llyr 2, the proposed Project is only Llyr 1). Further to the creation of new jobs, the proposed Project will create new temporary training opportunities and direct construction FTEs opportunities in the supply chain, this will lead to an improvement of the skills base in the local area.

[1] Based on R-UK statistics; https://www.renewableuk.com/page/UKWEDExplained/Statistics-Explained.html

3. THE PROPOSED PROJECT LOCATION AND CONTEXT

3.1. Overview

24. The proposed Project is located in Pembrokeshire, southwest Wales and within the Celtic Sea off the coast of Pembrokeshire. The proposed Project location is largely linear in shape and is comprised of the OnECC which provides sufficient space for the onshore export cables and the proposed Project substation and associated infrastructure. The Onshore Development Area extends from Landfall at Freshwater West to the grid connection point at Pembroke Dock Power Station. The Offshore Development Area extends seaward from landfall at Freshwater West and comprises the Array Area within which the WTG are located and the offshore export cable corridor (OfECC). The offshore and Onshore Development Areas are shown in ES Figure 4-1 and Figure 4-2 respectively.

25. This section of the Planning, Design and Access Statement sets out the planning context of the proposed Onshore Development Area. It describes the site selection process and provides an overview of the planning and environmental designations within and adjacent to the Onshore Development Area.

3.2. Onshore Development Area

26. The onshore elements of the proposed Project lie within the authority boundaries of Pembrokeshire Coast National Park Authority (PCNPA) and Pembrokeshire County Council (PCC). The proposed route of the OnECC, will run east from landfall at Freshwater West to the proposed point of connection at the existing Pembroke Power Station and will be contained within the Onshore Development Area (ES Figure 4-2) a snapshot of which is shown as figure 3.1 below.

27. The majority of the land included within the Onshore Development Area is agricultural land, mainly comprising Grade 3b (moderate quality agricultural land) with some Grade 2 (good quality) a full breakdown of the agricultural land classification is presented within **ES Chapter 12: Agriculture and Soils.** An area of dunes is present in the west of the site adjacent to Freshwater West.

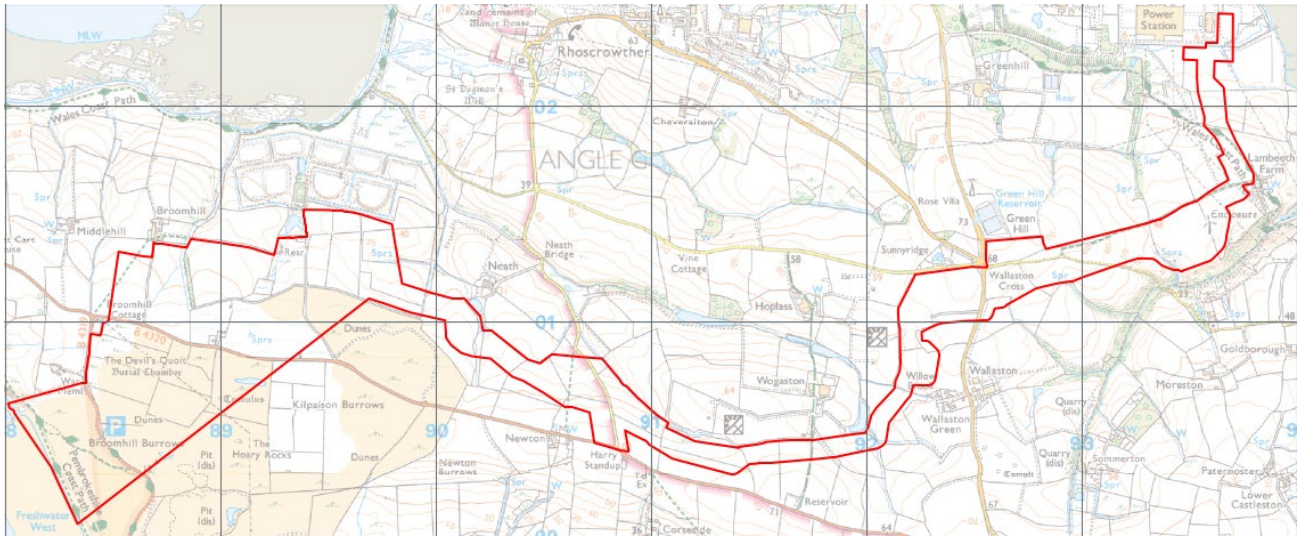


Figure 3-1: Onshore development area

28. There are limited industrial or commercial land uses within the immediate vicinity of the Onshore Development Area. To the north of the Onshore Development Area lies the disused Angle Bay oil refinery and at the eastern most point of the Onshore Development Area is the

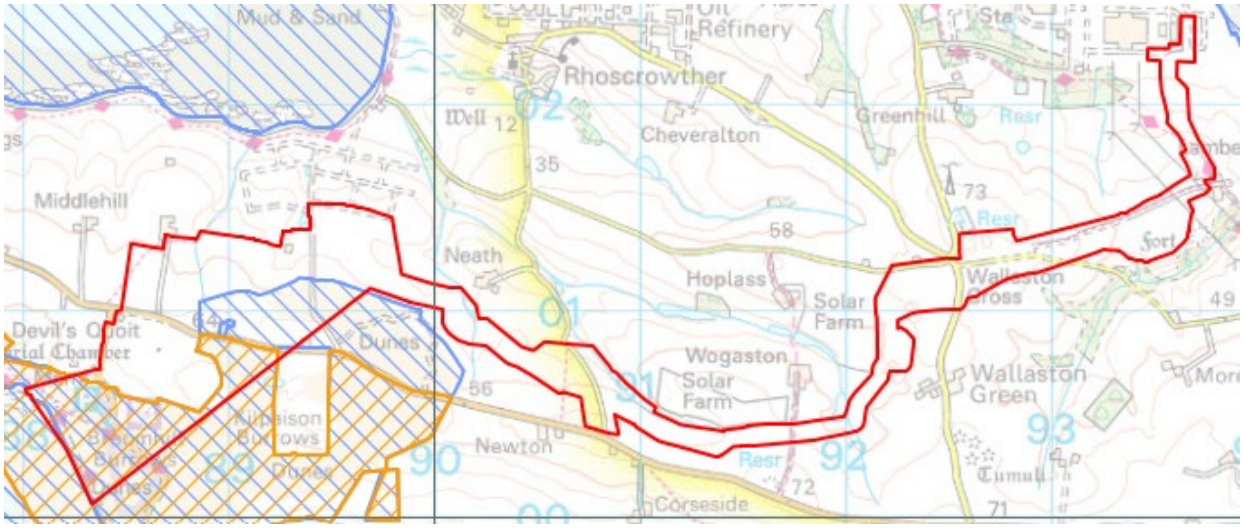
Pembroke Power Station (the proposed point of connection), two existing solar farms; at Little Neath and Hoplass lie adjacent to the north of the Onshore Development Area.

29. There are small areas of woodland and sporadic trees located throughout the Onshore Development Area, these are generally associated with field boundaries, there is no ancient woodland located within or adjacent to the Onshore Development Area.
30. The topography of the land within the Onshore Development Area is undulating, with steep slopes located along the coastline.
31. The following villages are in proximity to the Onshore Development Area:
    - Angle is approximately 3 km to the northwest.
    - Rhoscrowther is approximately 1 km north.
    - Newton is adjacent to the south; and
    - Wallaston Green is approximately 200 m to the east.
32. The Onshore Development Area does not cross any railway lines but does cross the B4319 and the B4320 Angle Road. Several smaller roads and access roads also lie within the Onshore Development Area. The following Public Rights of Way (PRoW) cross the OnECC; Footpath SP2/13, Footpath SP2/12, Footpath SP34/5, Footpath SP34/6, Bridleway SP37/6, and Footpath SP37/7. Further details of the PRoW located within and surrounding the Onshore Development Area is set out in **Chapter 13: Traffic and Transport** of the ES.

3.2.1. Onshore Designations and Allocations: Statutory Designations

33. The Onshore Development Area has been selected and designed to avoid designated areas as far as possible. The following list identifies those sites of international importance and proximity to the Onshore Development Area, the designations that intercept the Onshore Development Area are illustrated on figures 3.2 and 3.3 below:
    - Limestone Coast of South West Wales/Arfordir Calchfaen De Orllewin Cymru SAC: within the western portion of the Onshore Development Area.
    - Pembrokeshire Marine/Sir Benfro Forol SAC; located at Freshwater Bay, within the Onshore Development Area.
    - Castlemartin Coast SPA; located at the proposed point of landfall at Freshwater Bay, within the Onshore Development Area.
    - West Wales Marine SAC/Gorllewin Cymru Forol; located at Freshwater Bay, within the Onshore Development Area.
    - Pembrokeshire Bat Sites and Bosherton Lakes / Safleoedd Ystlum Sir Benfro a Llynnoedd Bosherton SAC. The SAC is split across 8 Sites of Special Scientific Interest (SSSI) the closest of which; Orielton Stable Block and Cellars SSSI is located approximately 2.8 km southeast of the Onshore Development Area.
    - Skomer, Skokholm and the Seas off Pembrokeshire / Sgomer, Sgogwm a moroedd Benfro SPA. Located approximately 4.3 km south of the western extent of the Onshore Development Area.
34. There are no Areas of Outstanding Natural Beauty (AONB) within or in close proximity to the Onshore Development Area.
35. Within 7 km of the Onshore Development Area, are the following statutory designated sites of national importance:

- Broomhill Burrows SSSI, is located at the point of landfall. Brownhill Burrows is one of Pembrokeshire's largest dune systems, with the most extensive and diverse dune slack vegetation, covering 201 ha. This SSSI lies within the western extent of the Onshore Development Area and overlaps with part of the Limestone Coast of South West Wales SAC. However, this is avoided due to HDD method of construction.
- Milford Haven Waterway SSSI is located along the northern coast of the peninsula, at its closest point Milford Haven Waterway is approximately 200 m to the east of the Onshore Development Area.
- Angle Peninsula Coast / Arfordir Penrhyn Angle SSSI, located at West Angle Bay: is a SSSI designated for its geology and wide range of intertidal rock, sand and gravel habitats. It is located approximately 300 m west of the Onshore Development Area.
- Gweunydd Somerton Meadows SSSI is located approximately 400 m to the south of the OnECC boundary. This SSSI is of special interest for its grassland fungi and unimproved neutral grassland. This designation comprises 16 fields which includes marshy grassland, swamp, standing water, woodland, scrub and hedges.
- Castlemartin Range SSSI, is located adjacent to the Onshore Development Area. This area is of special interest for its marine biology, sand dunes, wetland habitats, calcareous grassland, cliff and coastal grassland and heath, together with the most extensive area of species-rich neutral grassland in Wales.
- Castlemartin Corse SSSI, located approximately 500 m south of the Onshore Development Area. Castlemartin Corse is of special interest primarily for its swamp and calcareous fen meadow habitats.
- Orielton Stable Block and Cellars SSSI, located approximately 2.8 km southeast of the Onshore Development Area. The site is of special interest as it is one of the largest nursery roosts of lesser horseshoe bat in Pembrokeshire.
- Scoveston Fort SSSI, located approximately 4.2 km north of the Onshore Development Area at its north-eastern extent, beyond the mouth of the estuary. The site is of special interest as it has a population of hibernating greater horseshoe bats, known as Rhinolophus ferrumequinum.
- Park House Outbuildings, Stackpole SSSI, located approximately 6.8 km southeast of the Onshore Development Area. The site is of special interest as it is one of the largest nursery roosts of lesser horseshoe bat in Pembrokeshire.



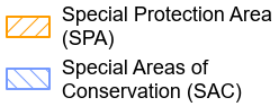


Figure 3-2: Internationally Designated Sites

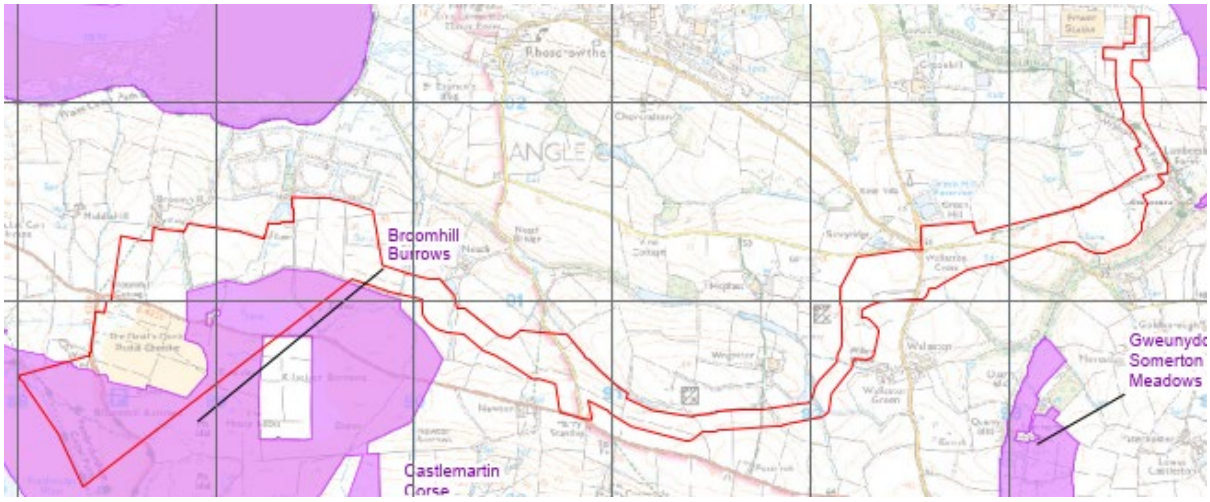


Figure 3-3: Nationally Designated Sites

36. The Applicant is submitting Habitats Regulations Assessment (HRA) Screening (**ES Volume 6 Appendix 8D: HRA Screening**) and a Habitats Regulations Assessment Report to Inform Appropriate Assessment (**ES Volume 6 Appendix 8E: HRA Report to Inform Appropriate Assessment**). These two documents represent the first stages of the HRA. The HRA is undertaken to assess the impact of the proposed Project on European designated sites and Ramsar sites, with all other designated sites assessed under the EIA process.

37. Within a 3 km buffer area of the OnECC boundary 23 scheduled monuments have been identified, with the following located within the Onshore Development Area boundary:

    - Devil's Quoit Burial Chamber (reference number: PE020) The monument is located to the south of Angle Road and east of the B4319, it comprises the remains of a chambered tomb, dating to the Neolithic period (c. 4,400 BC - 2,900 BC).

38. There are 116 listed buildings within 3 km of the OnECC boundary, largely as this search area includes part of Pembroke Dock with its concentration of surviving 19th-century structures, but also includes clusters of listed buildings at Angle and West Orielton. None of these sites are situated within the Onshore Development Area.

39. There are no conservation areas located within the Onshore Development Area, however the Angle Conservation Area is located within 3 km of the Onshore Development Area. There are no world heritage sites or registered historic parks and gardens located within the Onshore Development Area, the grade II listed Orielton registered park and garden is located within 3 km of the Onshore Development Area boundary.

40. The majority of the Onshore Development Area is located in Flood Zone 1, with areas of Flood Zone 3 at the point of landfall and at the point of connection to the Pembroke Power Station.

41. There are no statutory Air Quality Management Areas (AQMAs) within the Onshore Development Area, with the closest two located in the commercial centres of Haverfordwest located over 8 km to the northeast; and Pembroke, located along a stretch of the A4139 approximately 5 km to the east.

3.3. Offshore Development Area

42. The proposed offshore Array Area is located approximately 35 km south-west of the Pembrokeshire coastline in the north-east Celtic Sea and Bristol Channel, the proposed offshore export cable route corridor (OfECC) extends from the proposed Array Area to the south-west coast of Pembrokeshire, making landfall at Freshwater West as shown in the Offshore Development Area plan **ES Volume 5: Figure 4-1 Proposed Project Offshore Area.**

43. The water depths at the Array Area averages 65-75 m below Lowest Astronomical Tide. The offshore components of the proposed Project include the WTGs, associated mooring and anchoring infrastructure, inter-array cables, and the offshore export cables located within the OfECC.

3.3.1. Statutory Designations and Allocations

44. The Offshore Development Area has been selected and designed to avoid designated areas as far as possible. However, the Offshore Development Area overlaps or lies close to several nationally and internationally designated nature conservation sites, listed below. The potential impact on these sites has been assessed through the EIA.

- Bristol Channel Approaches SAC identified as a winter area of importance for the Celtic and Irish Seas Management Unit harbour porpoises. It lies 12 km east of the OfECC.
- West Wales Marine SAC is located off the coast of Wales, from the Llyn peninsula in the north, to Pembrokeshire in the south-west. It has been identified as an area of importance for harbour porpoise, it overlaps the OfECC and is 8.4 km from the Array Area.
- Limestone Coast of South West Wales/Arfordir Calchfaen De Orllewin SAC with some marine features including submerged sea caves. This SAC encompasses Freshwater West where the OfECC makes landfall.
- Pembrokeshire Marine/Sir Benfro Forol SAC, the designation covers the intertidal and subtidal marine and estuarine habitats over an area of approximately 138,039 ha. The Offshore Project Boundary intersects this SAC for approximately 15.14 km.
- Skomer, Skokholm and the Seas off Pembrokeshire SPA, designated to protect breeding populations of a number of species of seabirds. The SPA is located 37 km from the Array Area.
- Skomer MCZ - located almost 12 km to the north west of the Offshore Development Project Boundary, designated for the protection of benthic habitat and species, including kelp forests, rocky shores and turfs.
- Angle Peninsula Coast/Arfordir Penrhyn Angle SSSI. The boundary of this SSSI is located on the periphery of Freshwater West and is 0.15 km from the Offshore Development Area. there are no project activities in this zone because of the use of HDD between the onshore landfall and the offshore exit point.

3.4. Relevant Planning History

45. A planning history search has been undertaken within a 10 km radius of the Onshore Development Area. **Chapter 31: Inter-related Effects** of the ES considers the cumulative impacts of the proposed Project alongside those developments where cumulative impacts may be present.

3.5. Other Relevant Planning Applications and Consents

46. **Table 3-1** below details other recent planning applications in context of the Onshore Development Area.

3.5.1. Rhoscrowther Wind Farm: Development of National Significance (DNS) Consent

47. Rhoscrowther Wind Farm Ltd: (the Applicant) submitted an application for a DNS consent, reference number; DNS/3261355 to the Welsh Government on 11th October 2021. The application sought consent for, the construction and operation of three 4.3 MW wind turbines, with a maximum tip height of 135 m together with ancillary development comprising an electrical substation compound, electricity transformers, control buildings, new site entrances, access tracks, crane hardstanding, temporary construction compound and associated works. Located on land off Refinery Road, beside the Valero Refinery, Pembrokeshire. The application was refused, the main considerations sited within the decision letter are the effect of the proposed project on the landscape character and visual amenity of the area, with particular reference to the Pembrokeshire Coast National Park (PCNP); the setting of heritage assets; and ecology. An appeal was lodged against this decision although which was dismissed 16 January 2023.

3.5.2. Erebus floating offshore wind: Consent under S36 of the Electricity Act, with deemed planning consent and separate Marine License.

48. Blue Gem Wind (the Applicant) applied for a consent under S.36 of the Electricity Act 1989 (including an application for deemed planning permission) to the Welsh Ministers and a Marine Licence to NRW for a demonstration scale floating offshore wind development in the Celtic Sea region. The Array Area is located approximately 35km off the Pembrokeshire coastline. The project comprises six to ten Wind Turbine Generators (WTG) with a total generating capacity up to 100 MW. Each WTG is housed on a semi-submersible floating platform, with an offshore export cable, up to 49 km in length, linking the Array Area to landfall at West Angle Bay, Pembrokeshire.

49. The application for a Marine Licence was approved on 16th February 2023, with an expiration date of 31st December 2054. The Section 36 application gained consent on the 6th of March 2023. Conditions attached to the Section 36 approval included granting permission for a period of 25 years from the date electricity is first exported from the development to the grid.

3.5.3. Greenlink Interconnector: Planning Consent - Town and Country Planning Act

50. Greenlink Interconnector Limited submitted planning applications to Pembrokeshire County Council and PCNPA for the following:

- Application Reference: 20/0041/PA (Pembrokeshire County Council) for the development of a converter station and upgraded permanent access road from Wallaston Cross to the Converter Station, plus associated landscaping, drainage and other supporting infrastructure associated with the development at land to the south of Pembroke Power Station.
- Application Reference: 20/0044/PA (Pembrokeshire County Council) for the installation of two permanent underground HVDC cables, three permanent HVAC cables, permanent fibre optic cables and associated works extending from the boundary with PCNP at Neath Farm to land immediately south of the National Grid substation at Pembroke Power Station.
- Application reference: NP/20/0222/FUL (PCNPA for the proposed installation of two permanent underground HVDC cables, permanent fibre optic cables and associated works extending from the landfall site at Freshwater West to the boundary with Pembrokeshire County Council at Neath Farm.

51. These applications gained planning consent in July 2020. The Greenlink Interconnector comprises a subsea and underground electricity interconnector cable (with associated

converter stations) linking the existing electricity grids in Ireland and Great Britain with a nominal capacity of 500MW.

52. Other recent planning decisions within the Onshore Development Area are listed within the table below.

Table 3-1: Relevant planning history

Application Reference & Address	Description of Development	Status	Relationship with Llŷr
Pembrokeshire Coast National Park Authority			
NP/20/0222/FUL Site extends from sand flats at Freshwater West to Neath Farm, Rhoscrowther	*Installation of underground electricity cables and underground fibre optic cables; temporary construction compound and construction haul roads. Applicant: Greenlink Interconnector Ltd.*	*Conditional consent was granted for the scheme in July 2020.*	*The Onshore Development Area of the proposed Project Llŷr crosses the site boundary of the Greenlink Interconnector scheme.*
NP/21/0649/DOC	*Discharge of condition of NP/20/0222/FUL - CEMP*	*Condition discharged 20 December 2021*	
NP/21/0637/DOC	*Discharge of condition No's 3 and 10 of NP/20/0222 - Construction Traffic Management Plan & WS*	*Condition discharged 20 December 2021*	
NP/21/0698/DOC	*Discharge of condition No. 4 of NP/20/0222/FUL - Landscape Ecological Management Plan (LEMP)*	*Condition discharged 20 December 2021*	
NP/22/0453/DOC	*Discharge of condition No. 11 of NP/20/0222/FUL - Link pillar/box & marker post details*	*Condition discharged 13 September 2022*	
NP/22/0433/DOC	Discharge of condition No. 7 of NP/20/0222/FUL - Landscape Scheme	Condition discharged 17 August 2022	
Pembrokeshire County Council			
23/0497/SC Pembroke Power Station, Pwllcrochan, Pembroke	*Proposed Battery Storage - EIA Screening Opinion Request*	*Screening Opinion, the proposal does constitute EIA development, with likely significant effects on ecology and landscape.*	*The indicative development boundary of the proposed battery storage crosses the Onshore Development Area of Project Llŷr.*
20/0041/PA Land to the south of Pembroke Power Station, Lambeth Farm, Pembroke	*Development of a converter station and upgraded permanent access road from Wallaston Cross to the converter station. Plus, associated landscaping, drainage and other supporting infrastructure associated with the development.*	*Conditional consent was granted for the scheme in May 2020*	*The site location crosses the proposed Project Llŷr Onshore Development Area at Wallaston Cross and along Goldborough Road*

4. THE PROPOSED PROJECT

4.1. Introduction

53. The proposed Project aims to deliver a facility that will demonstrate the deployment of new floating offshore wind technologies, in Welsh waters. Due to the rapid development and evolution of floating offshore wind technology, a flexible approach is required to enable the use of the technology that is the most appropriate and efficient at the time of construction. To address this, the application for the proposed Project adopts a Project Design Envelope (PDE) or a Rochdale Envelope approach. This provides a degree of flexibility within the design of the proposed Project presented at application and for environmental assessment. The PDE sets design assumptions from which the worst-case parameters are assessed. The final design will lie within the extents of the worst-case parameters and so its effects will have been assessed within the ES. A further detailed description of the proposed Project is also provided within **Chapter 4: Description of Proposed Project of the ES**.

4.2. Description of Development

54. The proposed Project consists of both offshore and onshore works and will be comprised of the following main components:

4.2.1. Offshore Development Area

55. The Offshore Development Area comprises:

- The Array Area (45 km2), the area within which the following will be located:
- Up to ten Wind Turbine Generators (WTGs),
- floating substructures and associated mooring and anchoring infrastructure (**Figure 4-1** below illustrates the key components of a floating offshore wind turbine),
- 11 inter array cables (IAC), required to transmit electricity between the WTGs (with each IAC having a maximum length of up to 1.6 km).
- The OfECC which extends from the northern boundary of the Array Area to the Mean High Water Springs (MHWS) mark. Within the OfECC , the offshore export cable circuits will be located. Up to two offshore electricity export cables, each will have a maximum diameter of 200 mm and maximum length of 55 km. The offshore export cables will deliver electricity at either 66 or 132 kV High Voltage Alternating Current (HVAC).

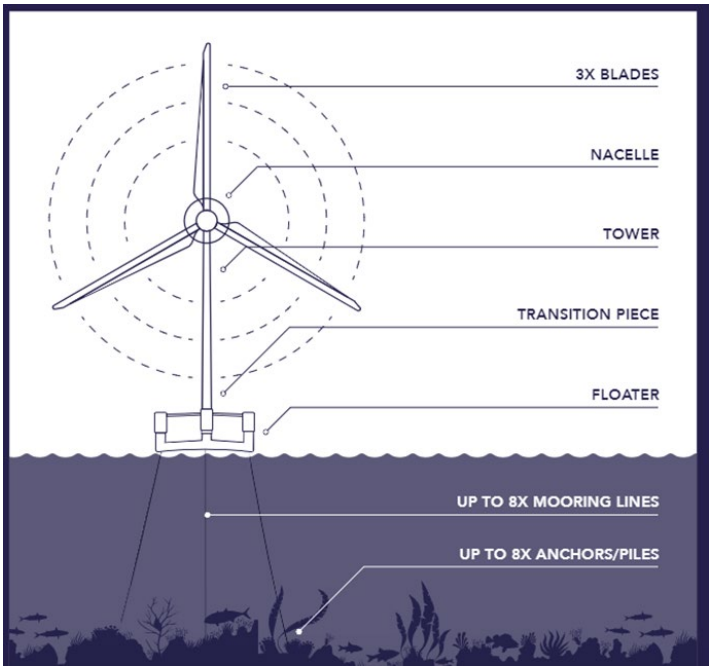


Figure 4-1: Indicative floating offshore wind turbine

4.2.2. Onshore Development Area

56. All infrastructure landward of the Mean Low Water Springs (MLWS) is considered onshore. The Onshore Development Area is comprised of:

- Cable Landfall (the Landfall) located at Freshwater West where up to two offshore export cables will be brought ashore via horizontal directional drilling (HDD) and to the Transition Joint Bay (TJB), the TJB is where the offshore and onshore cables are joined together.
- Landfall HDD drilling will require one 100 m x 75 m temporary compound as part of the HDD temporary works area.
- The onshore export cable corridor (OnECC): the area within which the onshore export cable circuits will be located. The OnECC runs from Mean Low Water Springs (MLWS) at Freshwater West to the grid connection location at Pembroke power station. The precise route of the onshore export cable will be refined in the run-up to construction to a working width of up to 35 m contained within the assessed Onshore Development Area.
- Cable joint bays (CJB) may be required if the onshore cables are installed in sections, they will be needed to join the cables together.
- The onshore substation and substation compound: will occupy a maximum area of 126 m x 109 m (excluding SuDS and laydown area), an elevation drawing of the substation is provided in Section 5 below.
- The onshore cable circuit extending from the substation to the grid connection point at Pembroke Power Station, laid in trenches and/ or ducts.

57. A fully detailed description of the onshore infrastructure is presented within **ES Chapter 4: Description of Proposed Project.**

5. DESIGN DEVELOPMENT

58. This section provides an overview of how the design, including both the OnECC route and location of the proposed Project onshore infrastructure has developed. The main influences on the evolution of the design have included environmental considerations, engineering capability and stakeholder consultation.

59. The design of the proposed Project has been an iterative process involving consideration of multiple options and informed by stakeholder engagement.

5.1. Site Selection

60. The site selection process used a Geographical Information System (GIS) which enabled layering of relevant spatial constraints, drawn from existing sources, to produce a series of constraints maps to help identify specific areas within the general area of search. Alternatives were considered as part of the initial site selection process, this included the landfall location, location of the substation and the onshore cable route. As an iterative process, the design of the proposed Project has been informed by stakeholder engagement. **Chapter 3: Site Selection and Alternatives of the ES** contains a full description of the alternatives considered within the design process.

5.2. Landfall

61. The proposed landfall at Freshwater West was selected based on engagement with stakeholders, discussions with National Grid, feedback from the Scoping Opinion and known environmental and technical constraints. For further details on how the landfall location was selected see **Chapter 3: Site Selection and Alternatives of the ES**.

62. To evaluate potential landfall options, a desk-based analysis of constraints was conducted, using publicly available and purchased data, and constraints mapping. A site walkover was also undertaken, on the 24th February 2023, to visually assess landfall options between West Angle Bay and Freshwater West.

63. Seven potential landfall locations were initially identified. Whilst all seven landfall sites were considered technically feasible, only West Angle Bay and Freshwater West were given further consideration on the basis that the other locations would require cliff face landings on a remote section of coastline with limited access.

64. At West Angle Bay, the Project Erebus cable corridor allows for two alternatives landfall sites; one situated to the north side of the bay and the other to the south of the bay. The remaining areas at West Angle Bay, considered by Erebus, were discounted due to multiple ecological, cultural heritage, and geological designations.

65. At Freshwater West, two landfall sites are considered. These landfall sites are located to the north and south of the Greenlink infrastructure and are located outside of the protected areas at Freshwater West.

66. When comparing the two landfall options at West Angle Bay, the southern landfall site was considered preferable due to the presence of a thrust zone along the northern edge of West Angle Bay and the Angle Conservation Area. As a result, the northern landfall site option at West Angle Bay was removed as an option. At West Angle Bay, the cable route and landfall site would have to be adequately separated from the Project Erebus cable route and landfall site. Similar separation distances to Greenlink's infrastructure will also be required at Freshwater West. At West Angle Bay, there could be the potential for a cumulative environmental impact resulting from the need to undertake construction work for both Project Erebus and Llŷr 1 in the same locality. No other potential landfall sites were identified

at West Angle Bay due to the presence of multiple ecological, cultural heritage and geological designations.

67. The landfall sites which were carried forward in the selection process were investigated further to fully understand environmental and engineering constraints located at each of the three areas. This exercise ensured that the landfall site chosen limited disturbance to people and the environment, whilst ensuring technical and economic viability.

68. The detailed desk-based analysis and landfall assessment identified that the Greenlink project experienced drilling fluid breakout on the beach during HDD operations and acknowledges the occurrence of this as a potential risk for the proposed Project. To mitigate this risk, the proposed Project will use a drill fluid that will pose little or no risk to the environment i.e. water with a non-oil based drilling fluid that is confirmed to be non-toxic and is biodegradable. Further a closed loop recycling system will separate the drill cuttings from reusable drilling fluids.

69. At the potential West Angle Bay landfall site, the primary constraints identified relate to cumulative environmental impacts resulting from the need to undertake construction work for both Project Erebus and Llŷr 1 in close proximity. The infrastructure for both projects would need to be adequately separated and, ideally, any cable crossing points avoided, unless an agreement was made to share cable routes and for construction to take place at the same time.

70. West Angle Bay landfall site was removed as an option since Freshwater West landfall sites are closer to the proposed substation options meaning that any onshore cable route from the Freshwater West landfall sites to the proposed substation options would be shorter. Additionally, the proximity to Project Erebus' proposed landfall cable was a key constraint identified with the West Angle Bay landfall option.

5.3. Onshore Substation and Onshore Export Cable Corridor

5.3.1. Onshore Substation

71. To facilitate the export of electricity from the onshore export cables to the point of connection at Pembroke Power Station it is necessary to construct a substation that will transform the voltage from 66 kilovolts (kV) to the National Grid Electricity Transmission (NGET) interface voltage of 132kV. A desktop study and site walkover were carried out to identify and assess potential locations within a 5 km radius of Pembroke Power Station that were deemed suitable for the location of the substation. Six potential substation options were identified.

72. The proposed substation will be sited approximately 4 km from the landfall and approximately 1.5 km from the grid connection point at Pembroke Power Station. The substation will occupy a maximum area of 126 m x 109 m (excluding the proposed SuDS and laydown area). The final design of the substation will be determined once it is confirmed whether air insulated or gas insulated switchgear will be utilised. The switchgear types are different sizes with the maximum height of an air insulated switchgear is 8 m whilst a gas insulated switchgear is 15 m. Indicative elevation plans of both options are provided below.

73. The selection of finishes for the onshore substation building and other infrastructure will be informed by the finishes of the adjacent developments (including Pembroke Power Station), to reduce the visual impact of the proposed Project.

74. The onshore substation has been designed to allow sufficient space to accommodate landscaping to provide a screening of the development in its environment. Whilst an existing section of hedge will be removed for the construction of the substation, new native woodland planting is proposed around most of the substation, the native woodland will provide

multifunctional benefits including diversifying the habitats at the substation site, it will provide a visual screen to maintain local character, it will compensate in part for the loss of connectivity from the partial loss of hedgerow during the construction and it will provide a carbon sink. The substation site will also incorporate species rich grassland planting. This will increase the diversity and condition of the habitat on the site.

75. The construction of the onshore substation will require the transportation of equipment will use local roads including the B4319 and B4320 to access the substation access road. A transport assessment has been undertaken of the outlying area to ensure the feasibility of Heavy Goods Vehicles (HGVs) to access the substation works area.

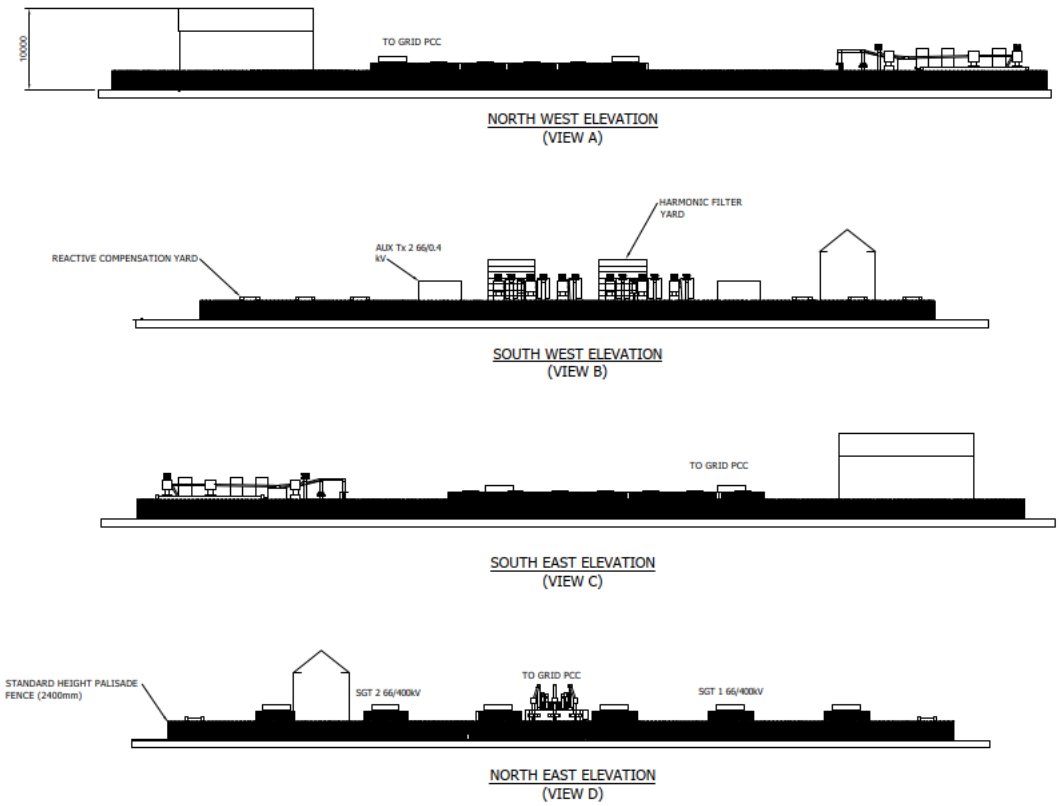


Figure 5-1: Llyr Option 2 Onshore Substation

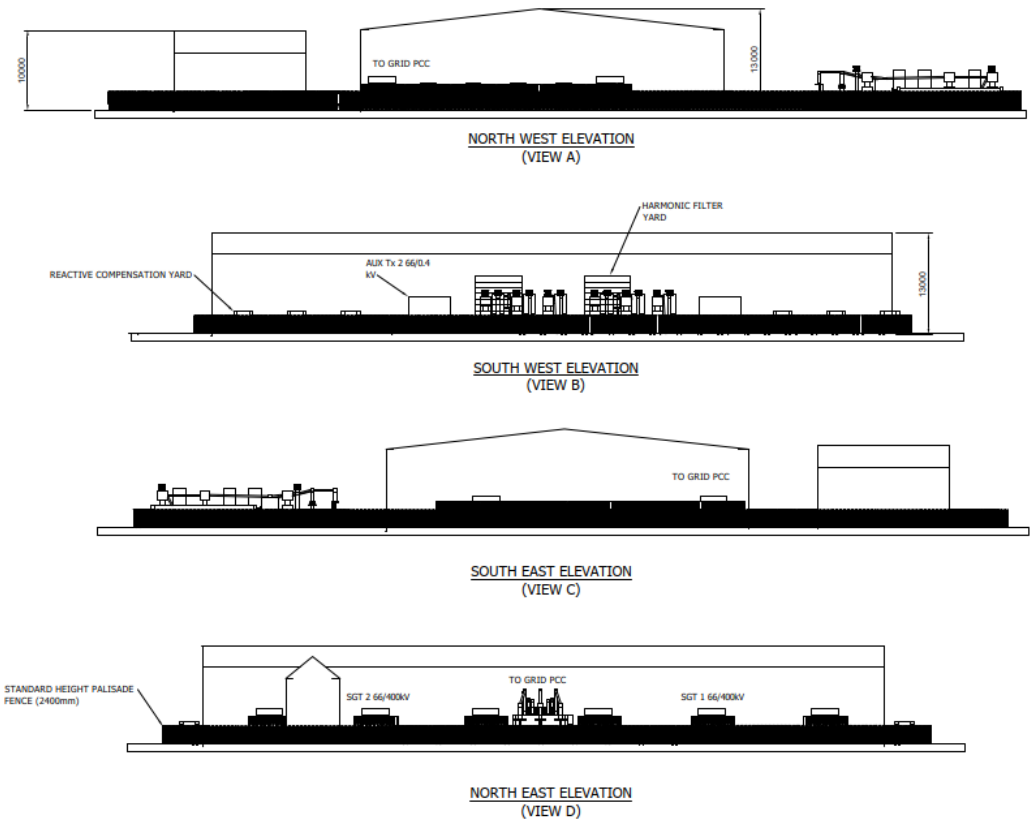


Figure 5-2: Llyr Option 1 Onshore Substation

5.3.2. Onshore Export Cable Corridor

76. Two onshore cable corridor options were identified between the landfall sites at Freshwater West and West Angle Bay, and the proposed substation search areas. The key criteria that were used to compare the proposed onshore cable route corridors included:

- Engineering feasibility for the construction methods likely to be used.
- Geology and the suitability for trenching.
- Known contamination, the costs and environmental risks associated.
- Flood risk and construction safety and associated cost.
- Topography and the complexity and duration of construction considerations.
- Physical characteristics of roads and the constructability and working methodology considerations.
- Services in roads and the availability of space.
- Traffic and the impact on other road users.
- Crossing watercourses, the potential for environmental permits to be required.
- Crossing service transverses, possible permits and temporary diversions required.
- Location of Natura 2000 sites and heritage assets.
- Other designations e.g., National Parks, Local plan allocations requiring additional assessments and consultation.
- Proximity to sensitive receptors, residences and recreational amenities; and

- The overall length of the proposed onshore cable route corridor

77. The options development study concluded that the OnECC route option from Freshwater West would reduce the onshore cable corridor relative to the alternative landfall site at West Angle Bay by 8.5 km, despite extending the offshore cable corridor by 2 km.

78. The cable installation will likely proceed sequentially along the cable route, starting from either the landfall or the onshore substation. If time constraints demand, concurrent installation may be carried out.

Temporary Construction Compounds

79. Temporary construction compounds will be required along the cable corridor for the duration of the cable installation works. The exact locations of the temporary construction compounds will be determined post-consent, once the onshore export cable route has been refined and set.

80. The compounds will provide secure storage locations for heavy duty plant, local site management offices, welfare, and local first aid points, and will also provide space for storage of cables, optical fibres, ducts, and other supplies required to complete the installation works.

81. Up to five temporary construction compounds will be formed in total (consisting of one main compound (100 m x 50 m) near to the substation, and four smaller (50 m x 50 m) satellite compounds). Access to the construction compounds will be undertaken via temporary gravel roads which will be constructed for the proposed Project with associated hardstanding areas.

82. If needed, temporary access tracks and haul roads will be constructed and will typically be up to 15 m wide, including verges and drainage channels, the width will depend upon topography and access requirements. The method of construction will also depend on ground conditions and topography.

83. Any topsoil and subsoil excavated during site preparation will be stored in accordance with best practice so that it can be reinstated as appropriate once construction activities are complete. Excess material will be disposed of accordingly at a registered landfill. Standard practice will be for areas of temporary land take to be reinstated to their original condition in agreement with and to the satisfaction of the landowner.

6. CONSULTATION

6.1. Overview

84. The Applicant is required to undertake pre-application consultation on the proposed Project prior to submitting the application under the Electricity Works (EIA) (England and Wales) Regulations, 2017 and the Marine Works (EIA) Regulations 2007. The approach to public and stakeholder engagement for the proposed Project was developed in compliance with the requirements of the following legislation:

- The Electricity Works (EIA) (England and Wales) Regulations 2017; and
- The Marine Works (EIA) Regulations 2007 (for projects requiring a marine licence under the Marine and Coastal Access Act, 2009). As amended by the Marine Works (EIA, Amendment) Regulation, 2017

85. The Llŷr Consultation Report submitted in support of the proposed Project provides a full and detailed account of the consultation which the Applicant has undertaken prior to the submission. An overview of the consultation for the proposed Project is provided below.

6.1.1. Public Consultation Events

86. Three public awareness days took place in July 2023 across the region which provided an opportunity for the public to learn about the early details of the proposals. Representatives from community groups, local businesses, Marine Energy Wales MHPA, PCNPA, Pembrokeshire County Council, Angle Community Council, Pembroke Dock Town Council, the Welsh Wildlife Trust, DWP, commercial fishermen and other interested individuals attended the public awareness days.

87. At these events attendees had the chance to engage with the project team, ask questions and provide feedback.

88. The Applicant held public consultation events between 15th January 2024 and 11th February 2024 with all the details about the proposed Project and the consultation made available on the Project website. All of the communications relating to the project were available in both Welsh and English language and consultation responses could be submitted in either Welsh or English.

89. Three drop-in events were held in locations close to the proposed Project. These events were designed for members of the public to attend, view the plans in more detail and ask questions of the project team.

6.1.2. Consultation Materials

90. During the initial public awareness days, copies of the EIA scoping report and opinion were available for viewing along with handout information leaflets, exhibition boards, supply month chain banners, skills and training banners a showreel and children's artwork showcasing the beauty of the Celtic Sea were on display for viewing.

91. During the public consultation held in January-February 2024 consultation material was presented on eight pull-up style banners with further detail provided in a consultation brochure, the Onshore Development Area Map, Offshore Development Area Map, a Frequently asked questions document, community consultation commitments document and feedback form were also available at the consultation events in both English and Welsh language versions. Copies of the consultation brochure and feedback form were also available at the events to take away. The consultation brochure provided at the events sought to introduce both the offshore and onshore elements of the Project.

92. An online Virtual Consultation Room (VCR) was used as an additional method of engagement with the public. The VCR provides greater accessibility and flexibility for people who are unable to attend in person events.
93. Hard copies of the consultation material (brochure and feedback forms) were made available for viewing at Pembroke Dock Library and Pembroke Library.
94. To raise awareness of the proposed Project and the public consultation, the Applicant:

- Distributed a bilingual postcard to all residential and business addresses within Pembrokeshire County Council's Hundleton Ward beforehand.
- Public access venues and local businesses were sent and asked to display posters promoting the consultation events.
- Stakeholders were notified via email about the consultation including details of the in-person events:
- Adverts were placed in local newspapers (Fishing News and Western Telegraph) to promote the consultation and providing an overview of the proposed Project: and
- A press release was issued to a range of news outlets; Windtech International, Yahoo News, Energy Central, Insider, RE News, Renewables Now, Gulf Oil and Gas, Trade and Export Finance, North American Windpower and Business News Wales.
- Social media posts on the Applicants LinkedIn and Facebook account were also shared in the time prior to the consultation.

6.1.3. Consultation Feedback Highlights

95. During the events attendees were encouraged to feedback ideas and comments on the proposed Project via online feedback through the applicants website and virtual consultation room via a hard copy of the feedback forms, available and returned at the consultation events, via email at the Llŷr project's dedicated email inbox (info@llyrwind.com) and through the post the Applicant publicised an address for comments to be sent.
96. A total of 26 responses were received to the public consultation: 13 responses received by email or letter, 10 responses by online feedback forms and 3 hard copy feedback forms. The topics raised through the public consultation and the applicant's response to the issues raised is presented within tables 5.6 - 5.11 of the **Llŷr Consultation Report**. The Consultation Report has grouped the responses into key themes which include:

- General feedback which includes support for the proposed Project, comments on the consultation process and the cumulative impacts of the proposed Project with other developments in the area:
- Comments relating to the offshore elements of the proposed Project which includes impacts on marine ecology, the visual impact and ship traffic:
- Comments relating to the proposed landfall or onshore cable routes which includes construction and operation impacts, visual impact and health concerns with regards the underground cabling: and
- Comments relating to minimising disruption and impacts on the environment during construction, including construction traffic.

7. PLANNING LEGISLATIVE AND POLICY CONTEXT

7.1. Introduction

97. This section of the Planning, Design and Access Statement addresses relevant national planning policy and advice, referencing National Planning Policy Statements, Welsh Planning Policy and the supporting Technical Advice Notes (TANs), the local development plan and Supplementary Planning Guidance (SPG) documents. These are all considered to be material to the determination of the application.

7.2. Onshore Planning Policy: National Planning Policy

98. National planning policy relevant to the proposed Project include:

- National Policy Statements; NPS for Overarching Energy (EN-1) 2024 and NPS for Renewable Energy (EN-3) 2024:
- Planning Policy Wales 12th Edition, and its associated Technical Advice Notes (TANs):
- Future Wales – The National Plan 2040 (FW):
- UK Marine Policy Statement (MPS): and
- Welsh National Marine Plan, 2019 (WNMP).

7.2.1. National Policy Statements

99. National Policy Statements (NPS) are devised for generating stations and energy infrastructure developments that would necessitate a development consent order under the Planning Act 2008. The Wales Act 2017 devolves competence for the consenting of electricity generating stations up to 350MW both on and offshore to the Welsh Ministers. As the proposed Project does not exceed this threshold, the NPSs are not directly applicable to the Project, but they are a relevant consideration given the type of development being proposed.

100. A suite of six NPSs addressing energy infrastructure were designated in July 2011 and published by the former Department of Energy and Climate Change (now the Department for Business, Energy and Industrial Strategy (BEIS)). Following a period of consultation on a set of revised NPS's published in 2023 the revised NPSs for EN-1 through EN-5 were designated on 17th January 2024.

7.2.2. National Policy Statement for Energy (EN-1) 2024

101. In both EN-1 and EN-3 the UK Government has made clear the urgent need for new renewable energy generation. Paragraph 3.3.62 of EN-1 introduces the critical national priority (CNP) for the provision of nationally significant low carbon infrastructure which as detailed at paragraph 4.2.5 includes (amongst others):

> '*for electricity generation, all onshore and offshore generation that does not involve fossil fuel combustion.'*

102. The national support for CNP infrastructure is set out at EN-1 paragraph 3.3.63:

> *'Subject to any legal requirements, the urgent need for CNP infrastructure to achieving the energy objectives, together with the national security, economic, commercial and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible.'*

103. The objectives in NPS EN-1 is for the energy system are to ensure the supply of energy remains secure, reliable, affordable and consistent with meeting the national target to cut greenhouse emissions to net zero by 2050. NPS EN-1 paragraph 2.3.4 acknowledges that meeting these

objectives necessitates a significant amount of new energy infrastructure, both large nationally significant developments and small-scale developments determined a local level. This suggests that there NPS reach is beyond the remit of nationally significant infrastructure projects (NSIP).

104. NPS EN-1 also highlights the opportunities to support jobs presented to the UK through new energy infrastructure.

105. Paragraph 3.3.20 of EN-1 emphasises the importance of wind and solar energy generation, suggesting that these are expected to be the main form of electricity generation in an energy system that meets the government's objectives for delivering secure, affordable energy and meets its climate change commitments.

7.2.3. National Policy Statement for Renewable Energy Infrastructure EN-3, 2024

106. NPS EN-3 considers that the need for any renewable energy NSIP is already established and need not be further considered in the determining of consents. EN-3 details technology specific policies, including policies to guide decision making on large offshore wind farms. Section 3.8 of EN-3 recognises the government target to deliver 50 GW of offshore wind including up to 5 GW of floating offshore wind by 2030; this target is in line with that set within the British Energy Security Strategy (BESS). In reference to the supporting onshore infrastructure associated with floating offshore wind developments, paragraph 3.4.7 refers to how offshore wind development should be climate adaptable it states that:

> '….any necessary land-side infrastructure (such as cabling and onshore substations) should be appropriately resilient to climate change induced weather phenomena.'

7.2.4. Future Wales: The National Plan 2040 (2021)

107. Future Wales: The National Plan 2040 is the national development framework for Wales. The document has an important role in driving sustainable growth and combatting climate change by setting out the vision and guiding strategic development up to 2040. Future Wales provides a strategy to address key national priorities through the planning system.

108. Future Wales acknowledges the climate emergency faced by Wales which is actively changing the Welsh environment and directly affecting communities. Future Wales notes the ecological emergency, where the behaviours and decisions of the human race are causing harm to the resilience of ecosystems and species nationally and internationally. Future Wales recognises the potential for wind, marine and solar energy generation in the south west region and the government's ambition for energy generation to play a role in supporting the south west economy.

109. Future Wales has a vision for how Wales will be in 2040, and to achieve this vision a series of ambitions are set out as 11 interrelated and inter-dependent outcomes. Outcome 11 of Future Wales aims to ensure Wales is a place which is decarbonised and climate-resilient through leading the way in promoting and delivering a competitive, sustainable decarbonised society, it states that:

> '*Decarbonisation commitments and renewable energy targets will be treated as opportunities to build a more resilient and equitable low-carbon economy.*'

110. Future Wales Policy 1: Where Wales Will Grow, presents the plans' spatial strategy, it emphasises the Welsh Governments support for sustainable growth in all parts of Wales. The policy identifies three regional growth areas; south west Wales (within which Pembroke and Pembroke Dock are located); mid Wales; and north Wales. Future Wales confirms that,

development within the regional growth areas will be guided by policies in strategic and Local Development Plans.

111. Policy 9: Resilient Ecological Networks and Green Infrastructure, requires the maintenance and enhancement of biodiversity to be demonstrated as part of development proposals.

112. Wales has an abundance of opportunities to generate renewable energy and the Welsh Government is committed to maximising this potential, this commitment is outlined within Policy 17: Renewable and Low Carbon Energy and Associated Infrastructure. Policy 17 requires decision makers to give significant weight to the need to meet Wales's international commitments and the Government's target to generate 70% of consumed electricity by renewable means by 2030. The policy presumes against large scale wind developments in National Parks.

113. Policy 18: Developments of National Significance, details support of low carbon energy projects, whilst the proposed Project is not a Development of National Significance it is otherwise in accordance with the policy. The reasoned justification to policy 18 states that onshore development aspects of offshore schemes are supported, including cable landfall infrastructure. Policy 18 requires that new strategic grid infrastructure for the transmission and distribution of energy should be designed to minimise visual impact on nearby communities.

114. Policy 29: Regional Growth Areas, Carmarthen and the Haven Towns, seeks to support sustainable growth and regeneration in Carmarthen and the Pembrokeshire Haven Towns (Haverfordwest, Milford Haven, Pembroke and Pembroke Dock). The preamble to the policy suggests that development in these towns will ensure they continue to provide jobs, leisure, retail and cultural opportunities, education and health services and connectivity infrastructure.

115. It is highlighted at Policy 32: Haven Waterway and Energy that the Welsh Government supports operations at Haven Waterway, recognising its location for potential new renewable and low carbon energy-related development, innovation and investment. Future Wales recognises through this policy that due to the characteristics of Haven Waterway, there is the potential for new, strategic energy development which also includes energy projects within marine environments.

116. The proposed Project aims to demonstrate new floating offshore wind technologies, this is in accordance with Future Wales's vision for Wales to become a world leader in renewable energy technologies. The proposed Project also supports Future Wales focus on supporting new strategic energy development, including marine energy. In consideration of the above policy's, Future Wales is considered to provide a positive policy framework for renewable energy developments and associated infrastructure.

7.2.5. Planning Policy Wales 12th Edition, 2024 and relevant Technical Advice Notes

117. Planning Policy Wales (PPW) establishes the key principles for the planning system setting out the land use planning policies of the Welsh Government. The primary objective of PPW, (paragraph 1.2) is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as is required by the Planning (Wales) Act 2015, the WBFGA.

118. PPW section 5.7 refers to energy; noting that low carbon electricity must become the main source of energy in Wales, with the future energy supply mix depending on a range of established and emerging low carbon technologies. Paragraph 5.7.6 identifies that the planning system should secure an appropriate mix of energy provision, which maximises

benefits to the economy and communities whilst minimising potential environmental and social impacts. Paragraph 5.7.7 goes on:

'The benefits of renewable and low carbon energy, as part of the overall commitment to tackle the climate emergency and increase energy security, is of paramount importance.'

119. Section 5.9 of PPW refers to renewable and low carbon energy, with paragraph 5.9.1 stating that local authorities should facilitate all forms of renewable and low carbon energy development and should seek cross-department co-operation to achieve this. Paragraph 5.9.19 states that:

'In determining applications for the range of renewable and low carbon energy technologies, planning authorities should take into account:

- *the contribution a proposal will make to meeting identified Welsh, UK and European targets:*
- *the contribution to cutting greenhouse emissions: and*
- *the wider environmental, social and economic benefits and opportunities from renewable and low carbon energy development*.'

120. Paragraph 5.9.25 identifies that the benefits associated with any renewable energy development should be fully factored into and given weight in the decision-making process.

121. Chapter 6 of PPW, Distinctive and Natural Places, seeks to ensure development plans and proposals look to the long-term protection and enhancement of the special characteristics and qualities of places, be these of natural, historic or built environments to ensure their longevity in the face of change. Paragraphs 6.4.24 – 6.4.30 discuss the importance of SSSI's. Paragraph 6.4.25 states that:

'*Development in a SSSI which is not necessary for the management of the site must be avoided. This is a matter of principle to ensure that these sites can continue to fulfil their role at the heart of resilient ecological networks.*'

122. Paragraph 6.4.27 of PPW sets out the requirement for exceptional circumstances for the consideration of development within a SSSI, this is discussed further in this document below in Section 8:

'*In wholly exceptional circumstances and only where development is considered to be appropriate and is not likely to damage a SSSI and there is a broad and clear agreement for mitigation and enhancement as part of a development plan should development be proposed. This means that development will be considered unacceptable in the absence of an agreed position in a development plan which indicates that it is acceptable in terms of its effect on the notified features of a SSSI*.'

123. PPW is supplemented by a series of topic-based Technical Advice Notes (TANs), each TAN (of which there are 19) provides detailed planning advice on a specific subject. TANs comprise national planning policy and as such PPW, the TANs and any circulars may be material to decisions on individual planning applications in Wales.

124. The TANs considered most relevant in the consideration of the proposed Project are summarised below:

- TAN 5: Nature Conservation and Planning, September 2009 - provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation.

- TAN 11: Noise, October 1997 - provides advice on how the planning system can be used to minimise the adverse impact of noise without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens of business.
- TAN 12: Design, March 2016 - provides advice on how promoting sustainability through good design and planning for sustainable building may be facilitated through the planning system, setting out five principles of good design, which include: access; character; community safety; environmental sustainability and movement.
- TAN 14: Coastal Planning, March 1998 - provides guidance in relation to coastal planning; referring to Shoreline Management Plans (SMPs).
- TAN 15: Development and Flood Risk, July 2004 - provides advice on development flood risk and provides a framework within which risks arising from both river and coastal flooding and from additional run-off from development in any location can be assessed. The overall aim of the framework is to direct new development away from areas which are at high risk of flooding.
- TAN 18: Transport, March 2007 - provides advice on an array of transport related issues including the location of development; accessibility; travel generating uses; rural areas; parking, design of development and assessing impacts.
- TAN 23: Economic Development, February 2014 - Economic development includes any form of development that generates wealth, jobs, and income.
- TAN 24: The Historic Environment, May 2017 - provides guidance on how the planning system considers the historic environment during development plan preparation and decision making on planning and listed building applications.

7.3. Local Development Plan

125. There are two existing Local Development Plans (LDPs) relevant to the proposed Project. These are:
    - Pembrokeshire County Council LDP, adopted in February 2013 and
    - Pembrokeshire Coast National Park LDP2, adopted in September 2020.

7.3.1. Pembrokeshire County Council Local Development Plan

126. The Pembrokeshire County Council LDP provides the framework for decisions to be made on how land is used and developed. Pembrokeshire County Council is currently in the process of reviewing their LDP, however have published an intent to delay the emerging LDP2. The current Pembrokeshire County Council LDP: Planning Pembrokeshire's Future, was adopted in 2013. Key policies of relevance to the proposed Project include those discussed below.
127. Policy SP1: Sustainable Development, requires all development proposals to demonstrate how positive economic, social and environmental impacts will be achieved and adverse impacts minimised.
128. Policy SP 16: The Countryside, emphasises that the essential requirements of people who live and work in the countryside will be met whilst protecting the landscape and natural and built environment of Pembrokeshire and adjoining areas. The policy highlights development which minimises visual impact on the landscape and relates to enterprises for which a countryside location is essential will be promoted.
129. Policy GN.1: General Development, seeks to permit development where the following criteria are met:

    '1. *The nature, location, siting and scale of the proposed development is compatible with the capacity and character of the site and surrounding area.*

2. *The proposal would not result in a significant detrimental impact on local amenity.*

3. The proposal would not adversely affect landscape character, quality or diversity, including the special qualities of the Pembrokeshire Coast National Park.

4. The proposal protects the natural environment.

5. The site is an accessible location and would incorporate sustainable transport and accessibility principles.

6. Suitable access, car parking and service infrastructure can be provided.

7. It would not cause or result in unacceptable harm to health and safety.

8. It would not have a significant adverse impact on water quality.

9. It would neither contribute to the coalescence of distinct settlements nor create or consolidate ribbon development.'

130. Policy GN.2: Sustainable Design, acknowledges that delivering sustainable development underpins the planning system in Wales and seeks to ensure new development is designed with regards to local distinctiveness and the local context.

131. Policy GN.4: Resource Efficiency and Renewable and Low-carbon Energy Proposals states that:

'*Development proposals should seek to minimise resource demand, improve resource efficiency and seek power generated from renewable resources, where appropriate. They will be expected to be well designed in terms of energy use'*.

132. The LDP recognises that offshore energy developments may lie outside the remit of the planning system, but that such a development may require landfall sites for energy infrastructure akin to the proposed Project.

133. Policy GN.37: Protection and Enhancement of Biodiversity, requires that all development should demonstrate a positive approach to maintaining and wherever possible, enhancing biodiversity.

7.3.2. LDP Review

134. Pembrokeshire County Council are preparing their Local Development Plan Review (LDP2), which is currently delayed. The Deposit Plan was published for consultation from January to March 2020, alongside a set of recommended Focussed Changes.

135. The preparation of the replacement LDP2 has been delayed, which included a return to the Deposit Plan stage. Due to the recommendations made by Natural Resources Wales, regarding phosphate levels in Special Areas of Conservation (SACs). Phosphate levels are higher than targets set by the organisation in significant areas of Welsh rivers. The guidance on phosphate levels has implications for the location of sites which can be included as allocations in the Plan. There is currently no date set to when the replacement LDP will be adopted.

7.3.3. Pembrokeshire Coast National Park Authority (PCNPA) LDP2, 2020

136. The PCNPA LDP2 outlines the long-term vision for PCNP, and the objectives and land use policies needed to deliver that vision. The LDP2 contains a series of key objectives, setting out how the vision will be achieved to tackle priority issues. Objective C: climate change, sustainable design, renewable energy and flooding, sets out that the renewable energy objective is to improve energy conservation and efficiency to contribute to national targets for renewable energy. This highlights a key outcome within the LDP that the National Park has a role to play in contributing to renewable energy generation. Along with the objectives, key policy is also set out within the LDP and those of relevance are detailed below.

137. Policy 1: National Park Purposes and Duty, requires development within the National Park to be compatible with the conservation and enhancement of the natural beauty, wildlife and cultural heritage of the Park.

138. The PCNP is widely recognised as Britain's only predominantly coastal national park. The scenic quality and natural beauty of the area contributes to the designation of the Park as a priority area within the LDP2. Policy 8: Special Qualities, underpins this and requires that the special qualities of the PCNP be conserved and enhanced through (amongst other things) retaining its sense of remoteness and tranquillity, protecting the landscape and avoiding development on the undeveloped coast.

139. Having identified the special qualities of the National Park through Policy 8, Policy 14: Conservation and Enhancement, seeks to ensure that these qualities are not lost to future generations. Policy 14 states that:

    '*development will not be permitted where this would have an unacceptable adverse effect on the qualities and special landscape and seascape character of the Pembrokeshire Coast National Park.*'

140. Policies 10: Sites and Species of European Importance, and Policy 11: Nationally Protected Sites and Species, both seek to safeguard protected species and habitats. Policy 14: Conservation of the Pembrokeshire Coast National Park seeks to conserve the qualities of the PCNP landscape and Policy 21: Minerals Safeguarding, seeks to ensure that mineral resources are not unnecessarily sterilised by permanent development.

141. Policy 29: Sustainable Design requires all proposals for development to demonstrate an integrated approach to design and construction, including being well designed in terms of energy generation and resilience to climate change.

142. Policy 33: Renewable and Low Carbon Energy sets out the policy framework for considering renewable and low energy proposals in the National Park. Policy 33 requires that proposals for renewable and low carbon energy development including those relating to wind will be permitted subject to meeting set criteria. This policy supports onshore connections that would not have an unacceptable adverse effect on the visual amenity, landscape character or nature conservations of the developed and undeveloped coast it acknowledges that each form of renewable energy technology will have specific impacts and effects that will need to be considered when considering proposals for these types of development.

143. Policy 62: Powerlines and Pipelines states that,

    '*cables or pipelines and associated development will be permitted where the least obtrusive and damaging location, route or means of provision is chosen*.'

144. Policy 62 goes on to suggest that opportunities for undergrounding should always be explored, paying attention and being considerate to the National Park's special qualities.

7.4. Supplementary Planning Guidance

145. In addition to the LPDs, both authorities have each adopted a series of Supplementary Planning Guidance (SPG) documents to support their LDP's. The SPGs address key land use development issues relating to biodiversity, landscape, historic environment, archaeology, seascape, renewable energy, design, and sustainable development the following SPG's are considered relevant to the proposed Project:

    - Cumulative Impact of Wind Turbines on Landscape and Visual Amenity, (adopted by PCC November 2022, adopted by PCNPA October 2022) sets out an agreed approach across PCNPA, PCC and Carmarthenshire County Council to assess the cumulative impact of

onshore wind turbines on landscape and visual amenity. Chapter 5 of the SPG; the relationship between onshore and offshore developments, recognises that the interaction between onshore and offshore wind turbines should be addressed where applicable.

- Biodiversity (adopted by both PCNPA and PCC May 2021) provides guidance on legal responsibilities, obligations and protection, conservation and enhancement of biodiversity during the development process. It supports policies contained within the PCNPA and PCC LDPs and should be read alongside them. The SPG details the various biodiversity features found within Pembrokeshire, the policy and legislation which governs them and good practice design methods to consider biodiversity in the development process.
- Renewable Energy (adopted PCC, 2016), seeks to guide applicants through the application process for renewable energy developments, assist case officers in making informed decisions on renewable energy applications; and help to ensure that the benefits of renewable energy generation are balanced with economic, social and amenity impacts on local communities and with environmental effects.
- Landscape Character (adopted PCNPA, September 2020), presents data sheets of 28 Landscape Character Areas within the PDNPA area. The data sheets present the main attributes of each character area including the location, context and physical characteristics. The proposed Project lies within LCA6 and LCA8.
    - LCA8 – Freshwater West/ Brownslade Burrows characterised as an area of rolling lowland almost devoid of settlement with associated coastal areas of fixed sand dunes. The special qualities of the LCA include It is a landscape of outstanding geological value, There is a highly exposed feel to this landscape with a constant awareness of the wind and the sea, The range of habitats present is of nationally significant importance, Old military installations provide reminders of the historical national importance of the nearby Milford Haven as a sea port and the need to protect its installations against attack.
    - LCA6 - Castlemartin Merrion Ranges characterised by very broad expanse of rolling lowland with associated coastal cliffs. The area is largely occupied by the Ministry of Defence (MoD). Special qualities identified include extensive views of the open sea from much of the high ground and along the coast from the coastal path.
- Renewable Energy (adopted PCNPA, 2021) SPG has been prepared to provide further guidance on the PCNPA LDP2 Policy 33: Renewable and Low Carbon Energy. Chapter 4 of the SPG refers to wind energy addressing instances of on-shore grid connectors for off-shore wind, providing general guidance for locating onshore grid connectors within the National Park.
- Minerals Safeguarding (adopted PCNPA, 2022) SPG presents information to help with planning applications on minerals safeguarding areas within the National Park. The SPG provides a flow chart to aid applicants in determining whether there is a need for the development to place within a mineral safeguarding area and if need is established, whether the mineral can be extracted prior to development. The onshore site boundary passes through two mineral safeguarding zones as identified on the Proposals Map.
- Sustainable Design and Development (adopted PCNPA, May 2021), SPG seeks to promote high quality, sustainable design through all types of new development. Noting that a design and access statement is required for all major planning applications within the PCNPA area.

- Seascape Character Assessment (adopted PCNPA, September 2020) SPG is a tool for the management of change in the coastal and marine environment and it is equivalent to and overlaps the landscape character assessment for the National Park.

7.5. Offshore Planning Policy

7.5.1. UK Marine Policy Statement

146. The UK Marine Policy Statement (MPS), 2011 adopted by the UK Government and devolved administrations sets out the high-level framework for preparing Marine Plans and taking decisions affecting the marine environment. Its purpose is to contribute to the achievement of sustainable development in the UK marine area and has been prepared and adopted for the purposes of section 44 of the Marine and Coastal Access Act 2009. The MPS and marine planning systems will sit alongside and interact with existing planning regimes across the UK. These include town and country and other legislation, guidance, and development plans. The MPS sets out a vision of having clean, healthy, safe, productive, and biologically diverse oceans and sea through supporting the development of Marine Plans.

147. The MPS states that,

> '*Marine based activities can provide opportunities for employment in… new and developing industries such as the renewable energy sector and associated offshore electricity transmission*.'

148. The MPS highlights that the potential sites identified for offshore renewables (including wind) show the huge exploitable renewable energy resource in the UK waters, which would keep the UK as a global leader in renewable energy production. The MPS highlights how the expansion of offshore wind requires significant investment in new high-value manufacturing capabilities, but this has the potential to regenerate local and national economies and provide employment.

149. Within section 3.3 Energy Production and Infrastructure Development, the MPS acknowledges that Marine Plans should consider, the national level of need for energy infrastructure, as set out in the NPS EN-1 which applies in England and Wales. Marine plan authorities will need to liaise, as appropriate, with terrestrial planning authorities to ensure the development of any necessary onshore infrastructure, to support offshore electricity generation and connection to the national grid. The MPS acknowledges that the marine planning process should be flexible in responding to emerging evidence about the impacts of new technologies in relation to renewables.

150. The MPS acknowledges offshore wind has the potential to have the biggest impact in the medium term on security of energy supply and carbon reductions through its commercial scale output.

7.5.2. Welsh National Marine Plan, November 2019

151. The Welsh Government's Welsh National Marine Plan (WNMP) aims to shape the seas of Wales to support economic, social, cultural and environmental objectives. The WNMP is the first marine plan for Wales, covering both inshore and offshore regions, it was adopted in 2019. The WNMP sets out how proposals will be considered by decision makers and seeks to guide the sustainable development of Wales's marine areas.

152. Marine energy resources around Wales provide the opportunity to create an abundance of renewable energy infrastructure within the Plan Area. This is outlined in paragraph 326 within the WNMP which states that,

'*there lies a good opportunity to deliver significant renewable energy generation and thereby make a strong contribution to securing an appropriate mix of sustainable energy provision, delivering social and economic benefit whilst respecting the environment and the needs of local communities.*'

153. The WNMP acknowledges that marine ecosystems are under pressure from a range of climatic, human and ecological pressures. To address this, policies within the WNMP follow a general theme whereby proposals should demonstrate that they (in order of preference): avoid adverse impacts; and/or minimise impacts where they cannot be avoided; and/or mitigate impacts where they cannot be minimised. If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding.

154. The policies within the WNMP that are of particular importance or relevance to the proposed Project are detailed below:

- Policy GEN_01: Planning Policy, presents a presumption in favour of the sustainable development of the plan area to contribute to Wales's well-being goals.
- Policy ECON_01: Sustainable economic growth, recognises that sustainable development of the marine environment has the potential to increase the prosperity of communities and people within Wales. Policy ECON_01 seeks to ensure that proposals provide or promote opportunities to support the economy.
- Policy SOC_01: Access to the marine environment, aims to contribute towards sustainable development by helping to support the health and well-being of coastal communities and safeguarding access to the recreational and well-being benefits associated with the marine environment.
- Policy SOC_02: Well-being of coastal communities, recognises that development and use of the marine environment has the potential to affect the socio-economic future of coastal communities.
- Policy SOC_05: Historic assets, requires proposals to demonstrate how potential impacts on historic assets and their settings have been taken into consideration.
- Policy SOC_06: Designated landscapes; requires proposals avoid adverse impacts on designated landscapes (including National Parks) and minimise or mitigate where adverse impacts can't be avoided.
- Policy SOC_07: Seascapes, requires proposals to demonstrate how potential impacts on seascapes have been taken into consideration.
- Policy SOC_10: Minimising climate change, demonstrates how proposals should minimise climate change through avoiding, minimising and mitigating greenhouse gas emissions. The policy aims to ensure that proposals consider all emissions directly related to the proposed development or activity (including operation and decommissioning), along with all the emissions indirectly linked to the proposed development.
- Policy SOC_11: Resilience to climate change, requires proposals to demonstrate that they have considered the impacts of climate change and have incorporated appropriate adaptation measures.
- Policy ENV_01: Resilient marine ecosystems, requires proposals to avoid, or if they cannot avoid, minimise or mitigate adverse impacts on marine ecosystems.
- Policy ENV_02: Marine Protected Areas (MPAs), requires proposals to demonstrate how they avoid adverse impacts on MPAs.

- Policy ENV_05: Underwater noise, requires proposals to demonstrate that they have considered man-made noise impacts on the marine environment.
- Policy ENV_06: Air and water quality, requires proposals to demonstrate that they have considered the potential air and water quality impacts.
- Policy ENV_07: Fish species and habitats, requires proposals which potentially affect important feeding, breeding and migration areas or habitats for key fish and shellfish species of commercial or ecological importance to demonstrate how they avoid, minimise or mitigate impacts.
- Policy GOV_01: Cumulative effects, requires proposals to demonstrate that they have assessed potential cumulative effects.
- Sector specific Policy ELC_01 Low carbon energy (supporting) wind. Policy ELC_01a: confirms that proposals for offshore wind energy generation will be supported where they contribute to the objectives of WNMP. Proposals should comply with the relevant general policies and sector safeguarding policies of this plan and any other relevant considerations; Policy ELC_01b: Low carbon energy (supporting) wind, states that in order to understand future opportunities for offshore wind development, including floating technologies, this plan supports strategic planning for the sector. This policy encourages relevant public authorities and the sector, in liaison with other interested parties, to collaborate to understand opportunities for the sustainable use of wind energy resources.

155. The WNMP contains two specific sector objectives, both directly relate to and support the proposed Project.

156. Objective one is concerned with the decarbonisation of the Welsh economy and aims to: contribute significantly to the decarbonisation of the economy and prosperity by increasing the amount of marine renewable energy generated through, supporting further commercial deployment of offshore win technologies at scale over the lifetime of the plan.

157. Objective two relates to developing Wales as a leader in the marine renewables industry, providing and advancing the infrastructure needed to achieve this. Objective two states the ambition is to:

    '*develop Wales as an exemplar of marine renewable energy technology by developing the essential skill base, infrastructure and technical knowledge to support the development of the industry over the next 20 years*.'

158. Paragraph 341 sets out the criteria that should be considered when determining planning applications for renewable and low carbon infrastructure. The Welsh Government's renewable and low carbon energy generation targets should be given significant weight by planning authorities, and should take into account:

- The contribution a proposal will make to meeting identified Welsh, UK and European targets and potential for renewable energy;
- The contribution to cutting greenhouse gas emissions; and
- The contribution to the objectives and other policies of this Plan.

7.6. Other Relevant Local Policy and Guidance

7.6.1. Shoreline Management Plan 20 – Lavernock Point to St Anne's Head

159. The proposed Project is located within the area of the South Wales Shoreline Management Plan (SMP2). SMP2 spans from Lavernock Point to St Ann's Head. The proposed landfall location is located within Policy Development Zone, 18 between St Govan's Head and Thorn

Island. SMP2 outlines policies to ensure environmental, infrastructure and socio-economic impacts in the coastal zone from adverse coastal processes such as erosion are minimised.

8. PLANNING APPRAISAL

8.1. Introduction

160. This section sets out an appraisal of the proposed Project's compliance with relevant planning policy documents identified in Section 7 above. The assessment is broken down by environmental topic and provides a high-level consideration of the key findings of the EIA as recorded within the ES. The ES identifies the likely significant environmental effects of the proposed Project on key topic areas as agreed within the EIA Scoping Opinion.

161. Having established the context for the proposed Project, the material considerations raised by the proposed Project are considered to include the following:

- Principle of the proposed Project, Climate Change and Renewable Energy Generation
- Design
- Terrestrial Environment Impacts
- Ecology and Nature Conservation
- Archaeology and Heritage
- Noise and Vibration
- Traffic and Transport
- Air Quality
- Landscape and Visual Impact
- Flood Risk and Drainage
- Ground Conditions
- Marine Environment Impacts
- Marine Water
- Marine Ecology
- Seascape
- Marine Archaeology
- Commercial Fisheries, Other Users, Shipping and Navigation
- Project Wide Impacts

8.2. Principle of the Proposed Development; Climate Change and Renewable Energy Generation

162. The need for renewable energy generation is clearly set out in national and local policy, as well as being required to meet legally binding emission reduction targets. The national planning policy document PPW requires that low carbon electricity becomes the main source of energy in Wales and emphasises the important role that the planning system has in securing an appropriate mix of energy provision which maximises benefits to the economy and communities whilst minimising potential environmental and social impacts. PPW sets a target of 70% electricity consumption to come from renewable energy by 2030. The proposed Project will support PPW objectives through the generation of renewable energy, the delivery of new FTE jobs and training opportunities in the local area and through environmental enhancements.

163. PPW presumes against large scale wind developments in National Parks, this objective is echoed within PCNPA LDP2 Policy 33: Renewable and Low Carbon Energy, which seeks to

support proposals for renewable energy generation subject to review of impact on the development on the special qualities of the National Park. The works proposed within the Pembrokeshire National Park as part of the proposed Project are limited to landfall. At landfall, once constructed the only visual sign of the proposed Project will be a link pillar (link pillars are approximately 680 mm by 100 mm by 1,200 mm high, they connect to the underground cables and are required for future inspection and maintenance purposes), the presumption does not apply in this case. During the pre-application stage the PCNPA has been consulted several times and confirm this point.

164. The proposed Project presents an opportunity for Wales to advance towards its climate change targets whilst bolstering Wales as a lead figure in the demonstration of new floating offshore wind technologies. The newly designated energy NPS's EN-1 and EN-3 set out the presumption in favour of granting consent to applications for energy NSIPs:

    '*unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused*.'

165. Paragraph 3.3.20 of NPS EN-1 sets out that the government expects wind and solar to form the majority of the generation capacity needed for a net zero, secure and cost-efficient energy system;

    '*wind and solar are the lowest cost ways of generating electricity, helping reduce costs and providing a clean and secure source for electricity supply (as they are not reliant on fuel for generation). Our analysis shows that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar*'.

166. The proposed Project's principal objective is to develop a new offshore generating station utilising innovative floating offshore wind technologies. The proposed Project provides an opportunity to generate energy from a renewable source, and in doing so supports the shift away from carbon-emitting energy generation methods. The demonstration aspect of the proposed Project will provide further benefits in supporting enhancements within the floating offshore wind industry on a wider scale. This is in accordance with Future Wales which aims for Wales to become a world leader in renewable energy technologies.

167. The proposed Project is presented in accordance with the aims and objectives set out within PPW in so much as it supports a move towards a low carbon and resilient society, it represents a sustainable development by maximising the benefits to the economy and community whilst balancing potential environmental and social effects. It is also considered that the proposed Project satisfies the seven well-being goals of the WBFGA detailed within **Table 8-1** below.

Table 8-1 WBFGA Well-Being Goals and the Proposed Development

7 Well-being Goals	Description	How is this addressed by the Project
A prosperous Wales	*An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the*	*The proposed Project's operational life is expected to be 25 years, after which it will be decommissioned or repowered (subject to separate consenting). During its operation the project would contribute to reaching global, European and national targets on CO2 reduction and renewable energy production.* *The proposed Project will support job creation and training opportunities. Further information on the energy produced by the Proposed Development and the potential job creation is provided in*

7 Well-being Goals	Description	How is this addressed by the Project
	wealth generated through securing decent work.	***Chapter 1: Introduction and Chapter 16: Socio-economic of the ES.***
A resilient Wales	*A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).*	*The ES details the considerations of the proposed Project on the baseline environment for several key receptors. Where appropriate, mitigation measures have been designed to ensure that no residual significant impacts are caused by the proposed Project.*
A healthier Wales	*A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.*	*The proposed Project will have no significant negative impacts on health and well-being, this is further detailed within* ***Chapter 16: Socio-economics of the ES.***
A more equal Wales	*A society that enables people to fulfil their potential no matter what their background or circumstances (including their socioeconomic background and circumstances).*	***Chapter 16: Socio-economics of the ES*** *provides an assessment of the impact of the proposed Project on socio-economic, recreation and tourism. The proposed Project will create new jobs and, offer temporary training opportunities in the area particularly during construction.*
A Wales of cohesive communities	*An attractive, viable, safe and well-connected communities.*	*The provision of job creation in the largely rural area will support the viability and contribute to a more diverse local community.*
A Wales of vibrant culture and thriving Welsh language	*A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.*	***Chapter 9: Historic Environment and Cultural Heritage of the ES*** *provides an assessment of the proposed Projects likely impact on the historic environment and cultural heritage. The proposed Project will support the progression of local communities through the provision of employment and training opportunities.*
A globally responsible Wales	*A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.*	*The proposed Project seeks to provide a demonstration development using new floating offshore wind technologies. The demonstration aspect of the Project will support other floating offshore wind developments coming forward elsewhere.*

8.3. Design

168. The incorporation of good design in the development of energy schemes is referred to within NPS EN-1 which sets out the principles for good design that should be applied to all energy infrastructure. NPS EN-1 section 4.6 states that applicants should consider how good design can be applied at the early stages of a project. It also recommends that applicants embed opportunities for nature inclusive design into their scheme and emphasises that wider impacts such as landscape and environmental impacts will be important factors in the design process. Paragraph 4.7.2 of NPS EN-1 states that,

'*Applying good design to energy projects should produce sustainable infrastructure, sensitive to place, efficient in the use of natural resources and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible*'.

169. Paragraph 4.7.2 goes on to acknowledge that:

'*The nature of much energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area*.'

170. NPS EN-3 paragraphs 2.51.4 - 2.51.5 set out that developers should consider the criteria for good design set out in section 4.6 of NPS EN-1, particularly in terms of layout, future maintenance, and retention of boundary vegetation.

171. Under Electricity act 1989 Schedule 9, 1 (1) and (2), the Welsh Ministers are required to consider the extent to which the Applicant has considered the preservation of natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings, and objects of architectural, historic or archaeological interest. The information that is contained within the various topic chapters of the ES provides the evidence required for the Welsh Ministers to be satisfied in relation to Schedule 9.

172. As detailed within section 4 of this Planning, Design and Access Statement, the proposed Project has adopted a Project Design Envelope. Section 5 of this document further outlines the design rationale, the site context, proposals, and access arrangements of the proposed Project. The accompanying ES provides further detail with regards the alternatives considered during the design evolution at **ES Chapter 3: Site Selection and Alternatives**. It is considered that the proposals presented are in accordance with Pembrokeshire County Council LDP Policy GN.1: General Development which requires the nature, location, siting and scale of the proposed development to be compatible with the capacity and character of the site and surrounding area; and Policy GN.2: Sustainable Design, which suggests that development will be permitted where design criteria are met, with good design which pays regard to the local distinctiveness being a key consideration. The siting and scale of the proposed onshore substation has been designed with consideration to the local character and existing environmental features, to ensure areas of dense population, areas of international and national designations (e.g. Ramsar, SAC, SPA, SSSI's), features of cultural heritage and important landscapes were avoided. The location of the proposed substation has been chosen so that it is in proximity to the existing road infrastructure and provide easy access for future management and maintenance of the substation. The proposed substation includes landscape planting including native woodland around most of the substation and species rich grassland, together these offer screening in the rural environment and provide a diversification of habitat. In designing the scale of the onshore substation, consideration was given to the cumulative context of other infrastructure projects in the area specifically Greenlink and Project Erebus.

173. PCC LDP Policy GN.2: Sustainable Design, and PCNPA LDP Policy 29: Sustainable Design, both require that development is designed to be sustainable and resilient to climate change. The proposed onshore substation has been designed to allow sufficient space to accommodate for the creation of a SuDS basin. The SuDS basin will result in sustainable drainage and benefits to flood management at the substation site whilst creating a new water habitat. PCNPA LDP Policy 8: Special Qualities, seeks to conserve and enhance the special qualities of the National Park through ensuring the good design and layout of development. The onshore infrastructure comprises cable landfall, the Transition Joint Bay, cable circuits, cable joint bays, the onshore substation and the onshore cable circuit. Once the construction phase is complete the onshore

export cable will be underground and so will avoid visual impacts on the PCNP other than temporarily, during the construction phase. Native woodland planting and earthwork bunds proposed at the substation site will provide screening of the development in the largely rural and agricultural environment; and species rich grassland planting will provide aesthetic value within the landscape and increase the diversity and condition of the habitats on the substation site. The scale of the sub-station is considered to conserve the special qualities of the National Park.

8.4. Terrestrial Environment Impacts

8.4.1. Ecology and Nature Conservation

174. Chapter 6 of PPW highlights the role that the planning system has in helping to reverse the decline in biodiversity and increase the resilience of ecosystems at various scales by ensuring appropriate mechanisms are in place to both protect against loss and to secure enhancement. The PCNPA LPD2 Strategic Policy 8: Special Qualities; Policy 10: Sites and Species of European Importance; Policy 11: Nationally Protected Sites and Species; and Policy 12: Local Areas of Nature Conservation and PCC LDP Policy GN.1: General Development and Policy GN.37: Protection and Enhancement of Biodiversity, all seek to safeguard the protected species and habitats located within the PCNP area.

175. As referenced within section 7 above, PPW requires that development proposals within (or affecting) SSSIs are avoided as a matter of principle. PPW implies that only in wholly exceptional circumstances and only where development is considered appropriate, is not likely to damage a SSSI and there is broad and clear agreement for mitigation and enhancement as part of a development plan should development be proposed.

176. In demonstrating whether there are exceptional circumstances to justify the proposed Project, consideration of the need for the proposed Project, whether alternative sites can be used in place of the proposed site location, the effect of the proposed Project on the natural environment, and the effect on the notified features of the SSSI is discussed below:

- **Need for the proposed Project:** Section 2 of this Planning, Design and Access Statement sets out the overarching need for the proposed Project, **Chapter 3: Site Selection and Alternatives** of the ES also discusses the background and need for the proposed Project. It is highlighted that the benefits the proposed Project will support Wales achieve its aim of delivering 70% electricity consumption from renewable energy and the UK in meeting the carbon reduction targets. The proposed Project will benefit other future floating offshore wind developments as it is also a demonstration project, providing a working example of how new floating offshore wind technologies can be successfully utilised within the Celtic Sea. Ultimately, the proposed Project is addressing the urgent need for renewable energy generation to meet identified net zero targets.

- **Site selection: Chapter 3: Site Selection and Alternatives** of the ES, has described the site selection rationale taken from the outset of the design evolution. The majority of the Pembrokeshire Coastline is designated as SSSI. The Milford Haven Waterway SSSI extends along the northern side of the Pembroke peninsula the boundary of which lies adjacent to the Angle Peninsula Coast SSSI which extends around Angle peninsula to the north of Freshwater West. The boundary of the Angle Peninsula Coast SSSI lies adjacent to the Broomhill Burrows SSSI, which extends south along Freshwater West until it joins the Castlemartin Cliffs and Dunes SSSI which extends south and east past St Govan's Head to Stackpole SSSI. The only gaps in the SSSI designations are at Pembroke Dock and Freshwater East. Should landfall be at Pembroke Dock the cabling associated with the project both offshore and onshore would be significantly increased, and further, Milford Haven is a busy shipping lane which during the installation would need to be closed to

allow safe passage of the cable installation vessel and Pembroke Dock has a RYA yacht club.

- Freshwater East is located within the MoD Castlemartin Live Firing Range to site the landfall here would have required a 10 to 20 km longer offshore and onshore export cable route than landfall at Freshwater West, due to these reasons Freshwater East was not selected for further consideration.
- **Effect on the SSSI:** The proposed landfall is located adjacent to the Broomhill Burrows SSSI. The SSSI is designated for its wide range of invertebrate species, including marsh fritillary and shrill carder bee. Due to this sensitive location, the construction activities here will follow a precautionary working method to ensure the avoidance of any damage to the sensitive dune habitats, plants and bryophytes, through vegetation clearance, trampling and crushing by machinery or people, or through pollution spills. It is proposed that horizontal directional drilling (HDD) techniques will be used at landfall to install the underground cable. This specialised drilling method will avoid direct impact to those sensitive features of the SSSI. **Chapter 8: Terrestrial Ecology and Biodiversity** of the ES concludes that based on a worst-case scenario and taking into account the mitigation measures included within the Construction Environmental Management Plan (CEMP) any likely potential impacts on the features of the SSSI would be temporary during the construction phase only and are considered non-significant, this is supported by the HDD construction technique proposed.

177. **Chapter 8 Terrestrial Ecology and Biodiversity** of the ES details the potential impacts and effects of the proposed Project on terrestrial ecology during the construction, operation, maintenance and decommissioning phases, it identifies mitigation and best practice measures to reduce the impacts of the proposed Project on terrestrial ecology.

178. Ecological designations within the onshore site boundary and those within a 5 km buffer of the Onshore Development Area are detailed above in Section 3.2.1. The ES Chapter 8 assessment identifies possible temporary habitat loss for hazel dormouse, badger and bats as a result of the construction of the proposed Project. Mitigation measures have been identified to reduce the potential impact including phased clearance protocols, implementation of a CEMP, landscaping to provide buffering from noise, light and human presence and the production and implementation of a precautionary working method (PWM) statement. The mitigation measures presented within Chapter 8 of the ES have been incorporated into the design of the proposed Project to limit the impact on all those ecological designations.

179. The application is also supported by a Green Infrastructure Statement **(ES Appendix 8F – Net Benefits for Biodiversity, Green Infrastructure Statement)** which seeks to demonstrate how the proposed Project

- applies the step-wise approach to ecological mitigation measures (i.e. step 1 avoid, step 2 minimise, step 3 mitigate/restore, step 4 compensate on-site, step 5 compensate off-site, step 6 refuse consent):
- utilised the DECCA (diversity, extent, condition, connectivity and ecosystem resilience) framework to support ecosystem resilience with regards to green infrastructure; and
- explored opportunities for incorporating green infrastructure, paying regard to the building with nature standards framework; and achieved net benefit for biodiversity.

180. In summary, the Green Infrastructure Statement identifies that the proposed Project delivers a net benefit in biodiversity through:

- Maintaining the extent and condition of habitats along the OnECC through avoidance and minimisation of impacts and through reinstating habitats that are lost therefore avoiding permanent loss:
- Improving the condition and diversity of habitats along the OnECC by increasing species richness where habitats are reinstated: and
- Increasing the diversity of habitats at the proposed onshore substation by compensating for habitat loss through the creation of a SuDS basin with integrated native scrub, species rich grassland and native woodland planting.

181. Chapter 8 of the ES concludes that when taking into consideration the mitigation measures proposed there are no overall significant adverse effects on ecology and biodiversity as a result of the proposed Project. When considering potential cumulative effects of the proposed Project and the other committed developments within the locality Chapter 8 acknowledges that during the construction phase there is a potential significant impact on dormice. This would be caused by the potential for simultaneous disturbance to, or loss of habitat. To address this potential impact on dormice the Applicant intends to consult with Pembrokeshire County Council to determine a timeline of development, to consider the other projects in the area, with the potential for mitigation measures and construction timeframes being combined across the proposed developments to reduce the potential effect.

182. The Applicant considers that the proposed Project is consistent with the policy objectives in relation to the protection of the natural environment.

183. PPW chapter 6 specifies that development in a SSSI which is not necessary for the management of the site must be avoided. HDD construction methods have been chosen to install the underground cables as HDD will reduce the chance of any disturbance of the SSSI. HDD techniques will be used at the landfall site at Freshwater West where the offshore export cable(s) from the Array Area are brought onshore and connected to the onshore export cables. HDD will allow the installation of the cable to pass under the SSSI with subsea cables being connected to the onshore cables in an underground transition joint bay. Any potential risk associated with HDD fluid spill will be mitigated through the use of a non-toxic, biodegradable fluid mix. Any potential disturbance will be temporary and limited to the construction phase of the proposed Project only. Further to the HDD techniques, construction activities will follow a precautionary approach to ensure any risk of damage is avoided and this will be informed through the implementation of the **ES Appendix 4A Outline Construction Environmental Management Plan (OCEMP).**

184. PPW paragraph 6.4.27 states:

> '*In wholly exceptional circumstances and only where development is considered to be appropriate and is not likely to damage a SSSI and there is broad and clear agreement for mitigation and enhancement as part of a development plan should development be proposed. This means that development will be considered unacceptable in the absence of an agreed position in a development plan which indicates that it is acceptable in terms of its effect on the notified features of a SSSI*'.

185. The Celtic Sea has been identified as a major development opportunity for floating offshore wind, offering exceptional circumstances for the proposed Project in regard to the local contribution the scheme will make towards meeting the nationally identified targets for renewable energy generation and reduction in CO2 emissions. Further, the demonstration aspect of the proposed Project will support the development of the technologies to benefit other future renewable energy projects. The scheme has been assessed through EIA and mitigation measures and enhancement has been proposed as part of the proposed Project to

ensure that the development within the SSSI is acceptable, without causing harm to the site. In compliance with section 5.9 of PPW which refers to the support for delivery of renewable and low carbon energy, a significant benefit associated the proposed Project is the generation of renewable energy. This will make a valuable contribution to meeting Welsh, UK and European energy targets and will contribute to cutting greenhouse emissions. The proposed Project will test and demonstrate new floating offshore wind technologies which will provide further benefits for other future renewable energy schemes. The Applicant considers that these benefits significantly and demonstrably outweigh the temporary indirect potential disturbance to the SSSI during HDD installation works.

8.4.2. Archaeology and Heritage

186. PPW and TAN 24: The Historic Environment, provide guidance on how to assess impacts on onshore archaeology and heritage arising from the proposed Project.

187. Paragraphs 5.9.16 and 5.917 of PPW note that in determining applications for a range of renewable and low carbon energy technologies, planning authorities should give significant weight to the Welsh Government's targets to increase renewable and low carbon energy generation and in circumstances where protected landscape, biodiversity and historical designated buildings are considered, only the direct irreversible impacts on statutorily protected sites and buildings and their setting should be considered.

188. PCC LDP Policy GN.38: Protection and Enhancement of the Historic Environment, seeks to ensure that development that affects sites of archaeological or historical merit can only be permitted where they are shown to protect or enhance the character. **Chapter 9: Historic Environment and Cultural Heritage** of the ES presents the assessment of potential impacts on onshore heritage assets. The ES has identified that several heritage-specific impacts could occur as a result of the proposed Project. There are 23 Scheduled Monuments within 3 km of the Onshore Development Area, the Devil's Quoit Burial Chamber (PE020) Scheduled Monument lies within the Onshore Development Area all other Scheduled Monuments lie outside the Onshore Development Area. The assessment considers that, during construction the scheduled monument will be impacted although this would be a temporary impact. There is potential for associated remains to exist within the Onshore Development Area.

189. Chapter 9 of the ES identifies 116 listed buildings within a 3 km buffer of the Onshore Development Area, largely concentrated at Pembroke Dock but also including clusters of listed buildings at Angle and West Orielton, none of which are located within the Onshore Development Area. The majority of the listed buildings would remain unaffected although four listings are identified that may potentially be affected:

- Rocket Cart House and Lookout Tower (17166 & 17167) grade II listed - the assessment considers that views from the building south-east will be affected during construction works:
- Roadside War Memorial (17162) grade II listed: and
- Somerton Farmhouse (6598) grade II listed – the assessment considers that views north from the building will incorporate the onshore substation, however the mature trees immediately to the north of the farmhouse are likely to partially restrict or filter views.

190. Chapter 9 of the ES also identified that there is one registered historic park and garden located within 3 km of the Onshore Development Area, the Grade II listed Orielton Park and Garden. The parkland lies approximately 2.7 km from the proposed Onshore Development Area and the environmental assessment has concluded that the parkland will remain unaffected by the proposed Project.

191. Mitigation measures have been included within the design of the proposed Project which include:

- Considerate routeing of the cabling to avoid designated and where possible non-designated assets.
- The use of HDD technology to avoid physical impacts on heritage assets.
- Limiting land take to only that which is needed to construct, operate and maintain the proposed Project, to minimise the disturbance to buried archaeology.
- Limiting stripping for construction compounds, haul roads and other associated works in areas where archaeology is recorded to avoid disturbance.
- During construction works, protective fencing and signage will be erected around known cultural heritage receptors to create buffer zones.
- Construction compounds are to be located outside of culturally sensitive areas.
- The layout of construction compounds will aim to reduce temporary impacts on the settings of historic receptors and to minimise visibility in views.
- Raising the awareness of construction workers and operatives of any control and reporting procedures to be followed.
- The control of light spillage, noise and dust within construction compounds and working areas.
- A programme of outreach/public engagement to raise awareness of the cultural heritage of the scheme.

192. The assessment in Chapter 9 concludes that with these mitigation measures in place, the residual effects on the historic environment and cultural heritage assets are not considered significant. Accordingly, the Applicant considers that the proposed Project accords with policies set out in PPW, TAN-5 and the PCC LDP relating to the safeguarding of the historic environment and heritage assets.

8.4.3. Noise and Vibration

193. As detailed within section 7 above PCC and PCNPA LDP's include policies aimed at ensuring proposals do not have a significant detrimental impact on the local amenity. This includes consideration of visual impact, loss of light or privacy, odours, smoke, fumes, dust, air quality or an unacceptable increase in noise or vibration levels. The ES has assessed the effects of these various issues, within **Chapter 7: Landscape and Visual, Chapter 13: Traffic and Transport, Chapter 14: Air Quality, Chapter 15: Noise and Vibration.**

194. The impacts of the predicted operational noise levels from the Onshore Development Area at surrounding residential receptors has been assessed and where a potential effect has been highlighted, additional mitigation measures comprising; maintaining a 40 m buffer to sensitive receptors where practicable; or to provide barriers where works are required within the 40 m buffer, these measures have reduced the overall level of effect.

8.4.4. Traffic and Transport

195. The PPW Technical Advice Note 18: Transport, outlines the transport issues that are to be considered when assessing planning applications. **Chapter 13: Traffic and Transport** of the ES assesses the potential impacts and effects of the proposed Project on traffic and transport during its construction, operation and maintenance and decommissioning phases. The effects of severance, fear and intimidation, accidents and road safety, pedestrian and cycle amenity

and driver delay were assessed within the chapter. The assessment identifies that the A477, the primary access route into the area, will be used to transport construction materials to the Pembroke Port, the proposed landfall site, the proposed OnECC and the onshore substation. The proposed substation site benefits from a direct access route from the A477, via the A4075, A4139 and the B4319. The A4139 provides a route suitable for larger construction vehicles, including abnormal loads. The largest construction components are expected to arrive via Pembroke Dock, the Ferry Lane rail bridge which was identified by project Erebus as being unsuitable for abnormal loads has been assessed for suitability and the largest substation components are able to be transported via this route. The signed weight restriction is aimed at dissuading larger vehicles from passing through the area.

196. To ensure that there are no underlying highway issues, personal injury collision data has been analysed as part of the ES assessment. The data showed that were 27 collisions recorded in the Study Area during the five-year period with the most common cause factor for these collisions being driver error. This suggests there are no collision patterns that would be exacerbated by the proposals. The assessment details the embedded mitigation measures proposed, including:

- Construction Traffic Management Plans – including signage near the junctions to highlight to drivers the potential for meeting construction vehicles: temporary speed limits implemented by the onshore substation: details of proposed abnormal loads and routing arrangements: PCC will be informed of plans to transport abnormal loads etc.
- Management of PRoW access – where PRoW cross the cabling paths access will be maintained as much as possible however if temporary closure or diversion is required then the appropriate permits will be sought from PCC.

197. The high level of baseline traffic on construction traffic routes results in the calculated change in noise due to construction traffic as being less than 1 dB, which is not significant in EIA terms. It is noted that the substation construction traffic will use Goldborough Road as an access route. The current baseline flows at Goldborough Road are very low with approximately 20 vehicles per day. The EIA concludes that, the peak average heavy vehicle movement of 18 movements per day is not considered sufficient to constitute a significant adverse effect for noise.

198. The existing traffic level in the area will increase during construction. The EIA assumes a worst-case scenario, assessing the coincidence of the construction phase of both the proposed Project and the Erebus project aligning. However it is more likely that the Erebus project construction phase will be in advance of that of the proposed Project. The ES Chapter 13 assessment concludes that no effects are considered to be significant.

199. With the mitigation measures in place the Applicant considers that the proposed Project accords with the policies set out in TAN18: Transport, TAN11: Noise and PCC LDP Policy: GN.1 with regards the location of development, accessibility and development in rural areas.

8.4.5. Air Quality

200. PPW notes that clean air contributes to a positive experience of place as well as being necessary for public health, amenity and well-being and highlights the health imperative of good air quality in contributing to the overall character and quality of places. **ES Chapter 14: Air Quality** assesses the impacts on air quality following the consideration of any mitigation measures proposed as part of the proposed Project. With the implementation of appropriate best practice control measures such as a construction dust and air quality management plan, the potential effect from dust or emissions are not considered a significant effect.

8.4.6. Landscape and Visual Impact

201. **Chapter 7: Landscape and Visual** of the ES and assesses the likely potential impact of the proposed Project on landscape character and visual amenity during construction, operation and decommissioning. PPW highlights that the landscapes of Wales are valued and requires local authorities to protect and enhance the special characteristics of landscapes, whilst paying due regard to the social, economic, environmental and cultural benefits they provide. In relation to landscape, TAN 12: Design, states that:

    '*appraisal of the landscape should focus on its quality in terms of geology and geomorphology, vegetation and habitats, visual and sensory quality and historic and cultural quality*.'

202. Pembrokeshire County Council LDP Policy: GN.1, requires development proposals to not adversely affect landscape character, quality or diversity, including the special qualities of the PCNP. The location of landfall and the connectors are located in the most appropriate position the design process has ensured the least obtrusive approach has been progressed. Policy SP16: Countryside, highlights the need to protect the landscape and the natural environment of Pembrokeshire and adjacent areas. The construction and decommissioning phases of the proposed Project have the potential to result in both direct and indirect change to physical and perceptual aspects of landscape character and views, with potential impacts occurring because of activity associated with the installation of the onshore export cable and construction (or demolition) of the onshore substation.

203. The landfall and part of the onshore export cable is located within the PCNP. The sensitivity of the special qualities of the PCNP are high. The construction of the onshore export cable would result in a limited and localised influence on physical attributes that contribute to the landscape character of the PCNP. Potential indirect change would be limited to perceptual attributes of the remoteness, tranquillity and wildness special quality, with very little or no influence on the remaining special qualities.

204. The rolling nature of the topography within and adjacent to the PCNP would limit the extent of potential indirect change related to construction of the onshore substation, such that it results in little, if any, change to the perceptual attributes of the special qualities of the PCNP. Construction related effects would be temporary in nature and of a short duration. Vegetation clearance to facilitate construction would be minimised as far as possible and the majority of vegetation and landform temporarily affected would be reinstated as part of construction such that no, or only very limited, impacts would remain at the operational stage of the proposed Project.

205. In relation to the onshore substation, change to views are limited mainly due to the substation occupying a small or distant part of available views and is often seen in the context of existing development. The ES assessment of landscape impact concludes that whilst the sensitivity of the receptors is considered high, the duration of construction is temporary and with the proposed mitigation in place there will be very limited impression of change resulting from the cable route. Additional mitigation measures including the positioning of the substation and the incorporation of tree planting assist in reducing the potential landscape and visual effects in the longer term.

206. The proposed Project is considered to be designed in compliance with TAN12: Design and TAN14: Coastal Planning and PCC LDP Policy GN.2: Sustainable Design, which seeks to ensure that new development is designed with consideration to local site context.

8.4.7. Flood Risk and Drainage

207. PPW highlights that planning authorities should adopt a precautionary approach of positive avoidance of development in areas of flooding. It requires development to reduce and not increase flood risk arising from river and/or coastal flooding on and off the development site. TAN 15: Development and Flood Risk, sets a precautionary framework which advises caution in respect of new development in areas at risk of flooding and this is used as a guide for decision making. Pembrokeshire County Council is the designated Lead Local Flood Authority (LLFA) and produced a Preliminary Flood Risk Report (PFRR) in 2011 which provides an assessment of past and future flood risks. The key points extracted from this PFRR are:

- The Study Area is not recorded as having any historic surface water flooding incidents;
- The Study Area has one historic sewer flooding incident recorded, however this was not located along the onshore cable route or at the Substation search areas; and
- The proposed Project is not listed within an area experiencing significant harmful consequences from a flood event where 10 or more residential properties or 3 or more commercial properties flooded.

208. **Chapter 10: Terrestrial Water Environment** of the ES presents an assessment of the existing terrestrial water environment and the likely potential impacts on the water environment as a result of the proposed Project. A Flood Consequence Assessment (FCA) has also been prepared to inform the assessment of the Onshore Water Environment. The FCA concludes that during the construction and decommissioning the cable route will be vulnerable to fluvial, tidal, surface water and groundwater flooding though there is limited risk to the substation. Once operational, the proposed Project will not be vulnerable to flooding as the cable route will be buried and the land will be returned to its pre-development condition. Mitigation measures for the construction and decommissioning and operational phases of the proposed Project in respect of flood risk are presented within Chapter 10 of the ES and it is considered that with the suggested mitigation measures in place, the sensitivity of the proposed Project to flooding is low.

209. The applicant considers that the proposed Project has been designed to comply with policy objectives with regards to flood risk and drainage concerns.

8.4.8. Ground conditions

210. PPW indicates that the countryside must be conserved and where possible enhanced for the sake of its agricultural value and natural resources, but also that there is a need to balance the conservation of these attributes against the economic, social and recreational needs of local communities and visitors. The PCNPA LDP2 relies on national policy in PPW in respect of development involving agricultural land. However Objective C of the Plan: Climate change, sustainable design, renewable energy, flooding seeks to safeguard and enhance the soil of the National Park.

211. **ES Chapter 11: Geology and Hydrogeology** and **ES Chapter 12: Agriculture and Soils** assess the impact on the ground conditions of the proposed Project. The Onshore Development Area is located within an area that has a number of sensitive land uses and designations, including SSSI, SAC, SPA and the PCNP. The land within the Onshore Development Area is primarily agricultural land in arable use. The Welsh Government's predictive ALC mapping identifies the land within the Onshore Development Area as comprising mostly Grade 2, (53 ha) Subgrade 3a (15 ha) and Subgrade 3b (123.6 ha) land, with small areas of Grades 4 and 5, and non-agricultural land. The agricultural land permanently lost and the disturbance and / or loss of soil resources throughout the proposed Project will be considerably less than the Study Area

due to the temporary nature of the cable installation works. The working width to install the cable within the cable corridor will extend to 35 m, which will require 25.3 ha of agricultural land along the length of the corridor, of which 12.1 ha is BMV quality in Grades 2 and 3a, this land will be required temporarily as it will be reinstated immediately following the completion of construction. Inevitably, some permanent loss of agricultural land will occur due to permanent built infrastructure the substation and transition joint bay. The permanent effects on agricultural land are concerned with the removal of approximately 8.2 ha of agricultural land, of which 2.3 ha is BMV land in Grade 2. The majority of land required for the proposed Project will be required temporarily, with land excluded from agricultural use for the duration of construction only. Agricultural land used temporarily during construction will be reinstated to agricultural use.

212. The long term effect on agricultural land is very limited, whilst land will be required during the construction phase of the proposed Project the majority of that will be reinstated on completion of construction. The BMV agricultural land that will be taken on a permanent basis will amount to 2.3 ha which is a small area. As such the design of the proposed Project is considered to comply with policy objectives with regards to safeguarding the agricultural land.

8.5. Marine Environment Impacts

213. The following considerations have been included within this planning statement for completeness only, as they relate to the aspects of the proposed Project which are located offshore. The offshore elements will be consented through the Marine Licence.

8.5.1. Marine Water

214. WNMP Policy SOC_03: Marine Pollution Incidents, requires proposals to demonstrate how they minimise their risk of causing or contributing towards marine pollution incidents. As detailed within **Chapter 18: Marine Water and Sediment Quality** of the ES, a number of designed-in mitigation measures have been proposed to reduce the potential for impacts on marine water quality, which may be impacted by changes in sediment quality, these are listed below, as a result of these measures no significant effects are anticipated on the marine water and sediment quality as a result of the construction, operation and decommissioning of the proposed Project:

- Third party vessel communication and management: Effective communication between vessels in the area throughout all stages of the proposed Project (pre lay surveys, installation, maintenance, and operation). This will reduce the likelihood of accidents or collisions at sea, which could result in fuel spills, adversely affecting marine water quality.
- Installation vessel requirements: The presence of a guard vessel around the installation area perimeter. All vessels will follow all international regulations governing safety at sea. All vessels will follow the International Convention for the Prevention of Pollution from Ships (MARPOL). This will include shipboard oil pollution emergency plans (SOPEP).
- Site and routing selection and design: Taking account of, and avoiding, potential hazards such as bathymetric features including rocks and sandbanks, shipping lanes and military exercise areas wherever possible will reduce the potential for spills or leaks occurring into the marine environment from collision with vessels. Sensitive ecological, physical, and archaeological receptors within the Offshore Development Area will also be considered.
- Turbine and substructure installation: Ensuring the seaworthiness of the turbine and substructure transport to the Array Area, which will subsequently reduce the likelihood of spills or leaks occurring in the marine environment. This will include a check of towing calculations, condition and specification of the towing equipment, emergency procedure by a Marine Warranty Surveyor. Above all suitable weather and sea state should be

present for the transportation and installation of the turbines (windspeed 17 m/s or less, wave height less than 5 m in height).

- Excavation techniques and turbidity: To prevent disturbance by suspended sediment on benthic habitats in the jet trenching phase of cable installation 'OSPAR Commission Guidelines on Best Environmental Practice' in Cable Laying and Operation must be adhered to. This includes to minimise the number of export cables that require trenching, avoiding sensitive benthic habitats in the route design wherever possible.
- Drilling fluid: HDD drilling fluids will be tested and selected to curtail environmental damage and potential leakage. This chiefly includes using biodegradable substances that Pose Little or No Risk to the Environment and adequate contamination testing and drilling fluid disposal.
- Water Quality and Pollution Management Plan: The measures in this plan will be put in place to prevent pollution to the water environment. Despite some of these measures being aimed at terrestrial water bodies, due to connectivity to the marine environment these measures are also deemed relevant to preventing adverse effects on marine water quality.

8.5.2. Marine Ecology

215. The WNMP policy EN_01 requires that proposals demonstrate how they contribute to the protection, restoration and or enhancement of marine ecosystems. Annex A of TAN 8 sets out a policy statement on renewable energy which notes aims to secure the right mix of energy provision in Wales whilst minimising associated environmental impacts. Paragraph 6.5.5 of PPW specifies that:

> '*The climate emergency exacerbates the challenges faced in coastal places resulting in losses of protected habitat, through 'coastal squeeze', or the loss of features which protect against inundation, such as sand dunes, as well as consequential effects on recreational beaches, people and property. The irreplaceable nature of some coastal habitats should be recognised and protected as finite and rare resources*.'

216. **Chapters 19-22 of the ES** assess the likely potential effects on, Benthic Ecology, Fish and Shellfish, Marine Mammals, and Ornithology. PPW highlights the importance of biodiversity for natural services, sustainability and the Welsh economy, it includes objectives to achieve efficient use and protection of natural resources and enhancing biodiversity. **Chapter 19: Benthic Ecology** of the ES assesses the existing intertidal and subtidal ecology of the Offshore Development Area including the proposed landfall at Freshwater West. This includes the habitats present; a number of protected habitats and species have been identified during the survey work.

8.5.3. Seascape, Landscape and Visual

217. NPS EN-3 highlights the importance of good design to help mitigate adverse landscape and visual effects. In relation to offshore development, it highlights the need to consider effects on seascape character. **Chapter 23: Seascape, Landscape and Visual**, assesses the likely potential impact of the proposed Project on seascape and landscape character and visual amenity during construction, operation and decommissioning. Visual considerations have helped to inform the siting and design of the proposed Project. Planning Policy Wales (PPW) (Edition 12, February 2024) indicates that the landscapes of Wales are valued and requires local authorities to protect and enhance the special characteristics of landscapes, whilst paying due regard to the social, economic, environmental, and cultural benefits they provide, and to their role in creating valued places. Marine Planning Policy Statement (2011) outlines

requirements to consider the existing seascape character, including quality, value, and capacity to accommodate change.

218. Construction and decommissioning of the proposed Project have the potential to influence certain perceptual aspects of seascape and landscape character and views. Potential construction and decommissioning impacts would principally occur because of activity associated with installation (or removal) of the proposed offshore export cables and installation (or removal) of proposed WTGs within the Array Area. Although the potential visibility of construction (or decommissioning) would be tempered by the considerable distance of the Array Area from the coast and the temporary nature of construction. ES Chapter 23 acknowledges that the considerable distance of most of the construction/decommissioning activity from the coast, the small part of the expansive seascape it would occupy, the existing context of commercial shipping as a characteristic of the seascape and views and the temporary nature of activities would all contribute to a reduced impression of change and no potential for significant effects during construction or decommissioning. The EIA considers the impact during the operational phase; the proposed WTGs would be located approximately 38 km (or greater) from each of the assessed viewpoints, whilst the proposed Project would introduce additional light sources into views (aviation lighting), the distance, location low on the horizon and very small part of the sky and view which would be affected would limit the sense of change.

8.5.4. Marine Archaeology and Cultural Heritage

219. NPS EN-3 and the NPS EN-1 contain several policies relevant to marine archaeology and cultural heritage. NPS EN1 paragraph 5.9.1, highlights potential adverse impacts on the historic environment from construction, operation and decommissioning of energy infrastructure. NPS EN-3 similarly highlights the need to avoid adverse impacts on cultural heritage assets identified offshore. It is suggested that the most effective means of protection is through micro-siting and routing of developments to avoid known and potential cultural heritage assets, thus leaving the assets in-situ. ES **Chapter 24 Marine Archaeology and Cultural Heritage** assesses the impact of the proposed Project.

220. The assessment acknowledged the potential for direct and indirect impacts during the construction, operational phases of the proposed Project could be mitigated using exclusion zones designed into the proposed Project.

8.5.5. Shipping and Navigation, Commercial Fisheries, Aviation and Radar and Other Sea Users

221. NPS EN-3 advises that applicant should reduce the risks to navigational safety to as low as possible and encourages applicants to engage with interested parties in the navigation sector early in the design process to help identify mitigation measures. ES **Chapter 25: Shipping and Navigation**, has assessed the potential environmental effects on Shipping and Navigation from the construction, operation and decommissioning phases of the proposed Project. Mitigation measures which include the deployment of an automatic identification system tracking device on the floating structures has been identified as a result of the assessment, other mitigation measures that have been agreed following consultation with stakeholders are detailed within Chapter 25. ES **Chapter 26: Commercial Fisheries** has assessed the potential environmental effects on commercial fisheries from the construction, operation and decommissioning phase of the proposed Project. The assessment has identified a potential for significant impact in relation to the reduced access to fishing grounds and associated displacement during the operational phase. The Applicant has proposed to develop a Fisheries Liaison and Co-Existence

Plan (FLCP) to define measures to encourage the co-existence and establish evidence based mitigation if needed in line with the FLOWW guidance[2].

222. EN-1 identifies that the potential effects on civil or military Communications, Navigation, and Surveillance (CNS), meteorological radars and/or other defence assets should be set out in the ES, accordingly **Chapter 27: Aviation and Radar,** assesses the impact on aviation and radar infrastructure. The potential impacts scoped into the assessment are radar clutter and physical obstruction, the assessment concludes that with mitigation comprising the provision of information to stakeholders so that the WTGs can be marked on charts the effect is considered to be negligible to minor adverse and so not significant. NPS EN-3 suggests that here a potential offshore wind farm is proposed close to existing operational offshore infrastructure or has the potential to affect activities for which a licence has been issued by Government, the applicant should undertake an assessment of the potential effect of the proposed development on such existing or permitted infrastructure or activities, **Chapter 28: Other Users,** presents that assessment. Other users include marine tourism and recreation, ports and harbours, oil and gas operations, renewable energy developments, subsea cables, marine dredge and disposal, aggregate site agreements and military activity. Mitigation measures for other sea users include a Communications Protocol agreed with the MOD and Castlemartin Firing Range reducing the likelihood of potential impacts and disruption, allowing exercises to be programmed accordingly.

[2] FLOWW Best Practice Guidance for Offshore Renewable Development: Recommendations for Fisheries Liaison, January 2014. Available at: https://assets.ctfassets.net/nv65su7t80y5/6Ce67sDj4QPy5WtZ641JuC/4c70caa6ea24d130a276d4002dcffde1/ei-km-in-pc-fishing-012014-floww-best-practice-guidance-for-offshore-renewables-developments-recommendations-for-fisheries-l.pdf and FLOWW Best Practice Guidance for Offshore Renewables Developments: Recommendations for Fisheries Disruption Settlements and Community Funds, August 2015. Available at: https://www.thecrownestate.co.uk/media/1776/floww-best-practice-guidance-disruption-settlements-and-community-funds.pdf

9. CONCLUSION AND PLANNING BALANCE

9.1. Summary

224. This Planning, Design and Access Statement has been prepared by AECOM on behalf of Llŷr Floating Wind Ltd in support of an application for a consent under Section 36 of the Electricity Act and a Marine Licence under Part 4 of the MCAA; for the construction, operation and decommissioning of a demonstration scale floating offshore wind development in the Celtic Sea. The statement also serves to inform the accompanying deemed planning consent for the associated onshore infrastructure, that will provide buried cabling, a substation and grid connection at the Pembroke Power Station.

225. Section 2 of this document has highlighted the national and international support for the development of renewable energy generation, not least within the recently designated Energy NPSs. NPS EN-1 and NPS EN-3 introduce the Critical National Priority for the provision of nationally significant low carbon infrastructure. NPS EN-1 specifically recognises that the need for CNP Infrastructure to achieve energy objectives, will in general outweigh any other residual impacts. As discussed above, NPS EN-1 highlights that a significant amount of new energy infrastructure, both large nationally significant development and small-scale developments determined at a local level is required. As offshore wind is considered Critical National Priority infrastructure, weight should be given to the identified need for the proposed Project when considering determination.

226. The increased policy support for the development of wind energy generation and new wind technologies is noted in Welsh national planning policy, PPW, which at paragraph 5.9.19 states that:

> '*In determining applications for the range of renewable and low carbon energy technologies, planning authorities should take into account:*
>
> *the contribution a proposal will make to meeting Welsh, UK and European targets.*
>
> *the contribution to cutting GHG emissions; and*
>
> *the wider environmental, social and economic benefit and opportunities from renewable and low carbon energy development*'.

227. In response to PPW, the proposed Project will provide a new facility for the generation of clean, renewable energy supporting the Welsh, UK and European targets for renewable energy generation, this will contribute to the global transition to net zero. The proposed Project will provide for wider environmental benefits through the provision of habitat enhancements, social benefits through the employment opportunities and skill uplift and will contribute to the accelerated development of the UK floating offshore wind industry as a pathfinder project piloting the development, construction, installation, and operation of floating offshore wind at a large scale in UK waters.

228. The successful delivery of the proposed Project will benefit other schemes through the contribution to wider learning of how floating offshore wind interacts at a large scale with the natural environment and local interest, to better understand the benefits and challenges of such a project and will identify further opportunities to enhance the local environment.

229. As discussed in the sections above, the design of the proposed Project has been iterative, it has been informed throughout its evolution by consultation with interested parties, environmental assessment and engineering best practices. Where potential likely negative effects have been identified through the assessment work; mitigation measures have been incorporated into the design to support a reduction in those effects and a series of further mitigation measures have been suggested that can be secured by condition of consent, these

further mitigation measures will support a reduction in the likely potential negative effects arising as a result of the proposed Project. Through sensitive design and detailed mitigation, the anticipated potential adverse impacts of the proposed Project are limited and have been minimised through further designed in mitigation measures.

9.2. Conclusion and Planning Balance

230. The importance of renewable energy generation is a crucial factor in reducing our reliance on fossil fuels, achieving energy security, reducing greenhouse gas emissions and meeting net zero targets. The proposed Project has the added benefit of utilising new technologies which will demonstrate to other future projects the capabilities of floating offshore wind.

231. When considered against the policy referenced within this Planning, Design and Access Statement, it has been detailed how the proposed Project will meet the seven well-being goals set out within the WBFGA. The delivery of the proposed Project will l make a meaningful contribution to meeting the urgent need for CNP infrastructure as detailed within the new National Policy Statements, and the test and demonstration element of the proposed Project will provide benefits to other future schemes and in supporting the transition to Net Zero.

232. In reference to the proposed landfall location and the Broomhill Burrows SSSI, it is acknowledged that PPW states only in wholly exceptional circumstances, should development be proposed within areas identified as a SSSI. This Planning, Design and Access Statement and the accompanying Environmental Statement have considered and assessed the potential impact that the proposed Project will have on the SSSI. It is proposed to use HDD construction measures within the SSSI, reducing the impact on the designated site. Duration of works within the SSSI are considered to be short term and once the proposed Project is operational there will be no impact on the SSSI, with the onshore cables being buried under the SSSI. As detailed within this document the benefits of the proposed Project are clear, employment and training opportunities both during the construction and operation phases of the proposed Project will have a direct positive impact in the local area, biodiversity enhancements and once operational the proposed Project will have significant beneficial effects in responding to the climate emergency as identified by the Welsh government through the delivery of renewable energy generation and will contribute to addressing the nationally identified need for renewable energy generation and promoting new renewable energy technologies for the benefit of other future schemes.

233. The design evolution of the proposed Project has been influenced by consultation with key stakeholders, . , comprising justification for the site location, the alternatives considered and the sympathetic design presents a well-considered development which responds positively to the relevant planning policy context and provides national and local benefits which are considered to outweigh the potential adverse impacts discussed above. It is therefore considered that, consent for the proposed Project should be granted to enable the benefits of the proposed Project to be realised.

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