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Regional Assessment of Offshore Wind Development in Nova Scotia  
Impact Assessment Agency of Canada  
200-1801 Hollis St.  
Halifax, Nova Scotia B3J 3N4

**Committee for the Regional Assessment of Offshore Wind Development in Nova Scotia,**

Thank you for the opportunity to provide feedback on the *Regional Assessment of Offshore Wind Development in Nova Scotia - Draft Report (Draft Report)*. We value the collaborative approach taken throughout this process and welcome the chance to share comments.

Parks Canada has two areas of concern with the Draft Report: potential impacts on the establishment of a future National Marine Conservation area in Nova Scotia, and potential impacts on the views from Cape Breton Highlands National Park.

**Potential impacts on the establishment of a future National Marine Conservation Area**

International best practices and Parks Canada policy suggest that industrial-scale wind development may have negative impacts on National Marine Conservation Areas (NMCAs):

- Countries such as Germany, Netherlands and the US exclude offshore wind farms in protected areas.
- The International Union for Conservation of Nature (IUCN) recommends that renewable energy developments avoid areas of high environmental significance such as protected and conserved areas, World Heritage sites, and Key Biodiversity Areas, particularly if the developments are incompatible with the objectives or the conservation outcomes of the area.
- Large-scale industrial wind developments do not align with the purpose and conservation objectives of Parks Canada's NMCAs, as set out in the *Policy on the Establishment and Management of National Marine Conservation Areas*, where "protecting marine ecosystems and biodiversity is of primary importance".

Parks Canada is working with the province of Nova Scotia, Indigenous partners, and other stakeholders to establish an NMCA in Nova Scotia. Two candidate sites have been

identified, but the identification of potential offshore wind development areas within the proposed NMCA may jeopardize establishment:

- The proposed Pemsik NMCA is the preferred candidate site and is located adjacent to Kejimikujik National Park Seaside and extends 100 km off the coast. The proposed NMCA will be representative of the Scotian Shelf Marine Region, including basin, bank, and shelf habitat, as well as biophysically diverse coastal estuaries, inlets, and beaches. The Pemsik NMCA is part of a broader Indigenous-led vision that connects several terrestrial and marine conservation initiatives. The LaHave Basin PDA boundary overlaps with the proposed Pemsik NMCA by approximately 700 km<sup>2</sup> (Figure 1).
- An alternate potential NMCA is of the coast of Cape Breton Highlands National Park. The Sydney Bight PDA overlaps with the NMCA boundary by approximately 190 km<sup>2</sup> (Figure 2).

### **Potential impacts on viewscales and visitor experience at Cape Breton Highlands National Park**

Visitor enjoyment of protected areas such as National Parks is often directly linked to viewscales. The approach to assessing impacts of development on viewscales, and to determining appropriate setback distances, is outlined in internationally recognized guidance (Landscape Institute and IEMA, 2013, *Guidelines for Landscape and Visual Impact Assessment*) and best practices:

- Impacts of changes in a viewscape can vary by location and are linked to the visitor, their expectation for views, and the extent to which attention or interest may be focused on the views.
- Visitors engaged in outdoor recreation with attention focused on the landscape and on particular views, and visitors to places where views are an important contributor to visitor sense of place, are more susceptible to negative impacts from changes in viewscape.
- In some European nations, visual impact assessments have been used as part of the Strategic Environmental Assessments for offshore wind development, and have resulted in setback recommendations for protecting sensitive coastlines.
- In the United States, visual impact assessments are carried out as part of the process to select development areas, and the National Parks Service is consulted to identify and avoid potentially sensitive viewscales.

Cape Breton Highlands National Park receives over 333,000 visitors in high visitation years, and is an economic driver for the local economy and regional tourism industry. Visitors are likely to be engaged in outdoor recreation with attention focused on the landscape and the views. Visitor experience is likely to be affected by changes to visual landscapes:

- This Park is a remote wilderness area with unaltered views of the ocean. Many of the most-visited trails and lookouts are located at higher elevations with ocean views.
- The value of the seascape and ocean views to visitor sense of place is reflected in the Parks Management Plan as well as in visitor photos posted in social media where a high percentage of the photos include ocean views.
- The draft report identifies the boundary of the Sydney Bight PDA at 25 km from the coast of Cape Breton Highlands National Park. While design and technological features may mitigate potential visual impacts, it is likely that wind turbines at a distance of 25 km will have an impact on the views.
- Based on our analysis that considered wind farms with turbines up to 350 m high and given that many viewpoints from the park are from some elevation, we have determined that a setback of 45 km from the coast would be more certain to ensure only negligible impacts occur on the Park's sensitive views.

Parks Canada appreciates the Committee's efforts to consider *Draft Report* feedback and to engage with our recommendations. We look forward to continuing to contribute to the Committee's processes and to supporting the successful completion of the Regional Assessment.

Sincerely,

<Original signed by>

✓ Jason Proulx  
A/Director, Natural Resource Management Branch

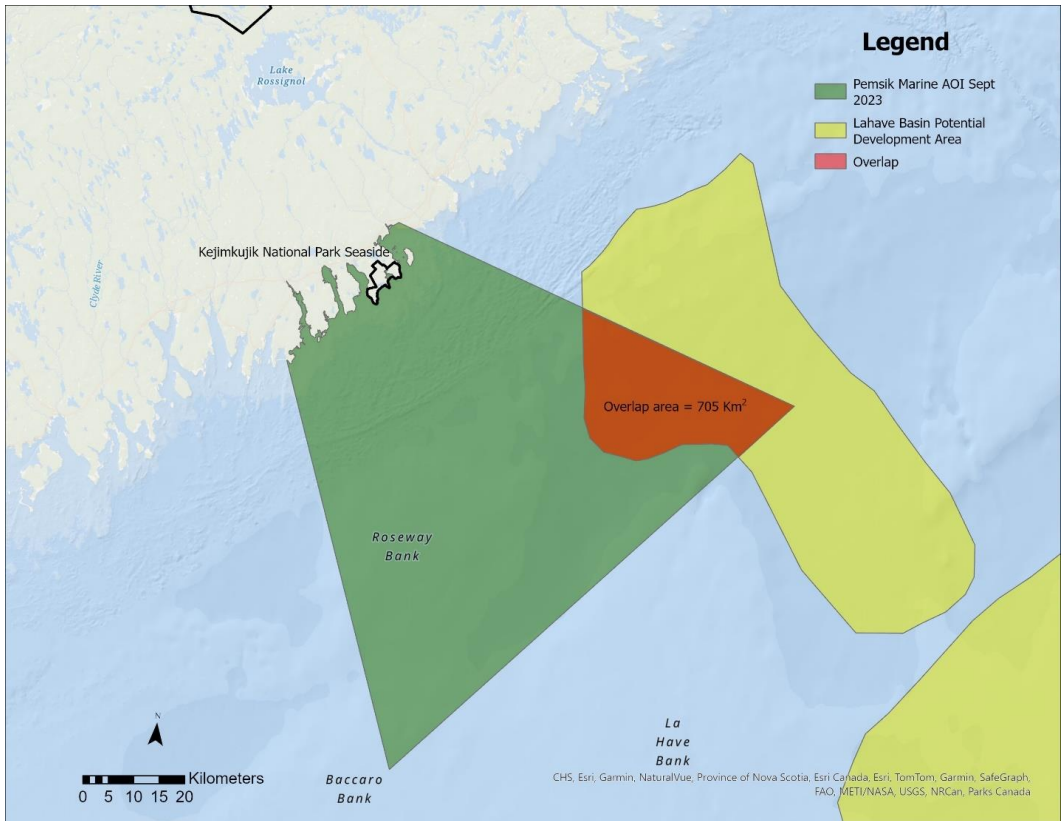


Figure 1 – Proposed Pemsik National Marine Conservation Area relative to the LaHave Basin PDA boundary

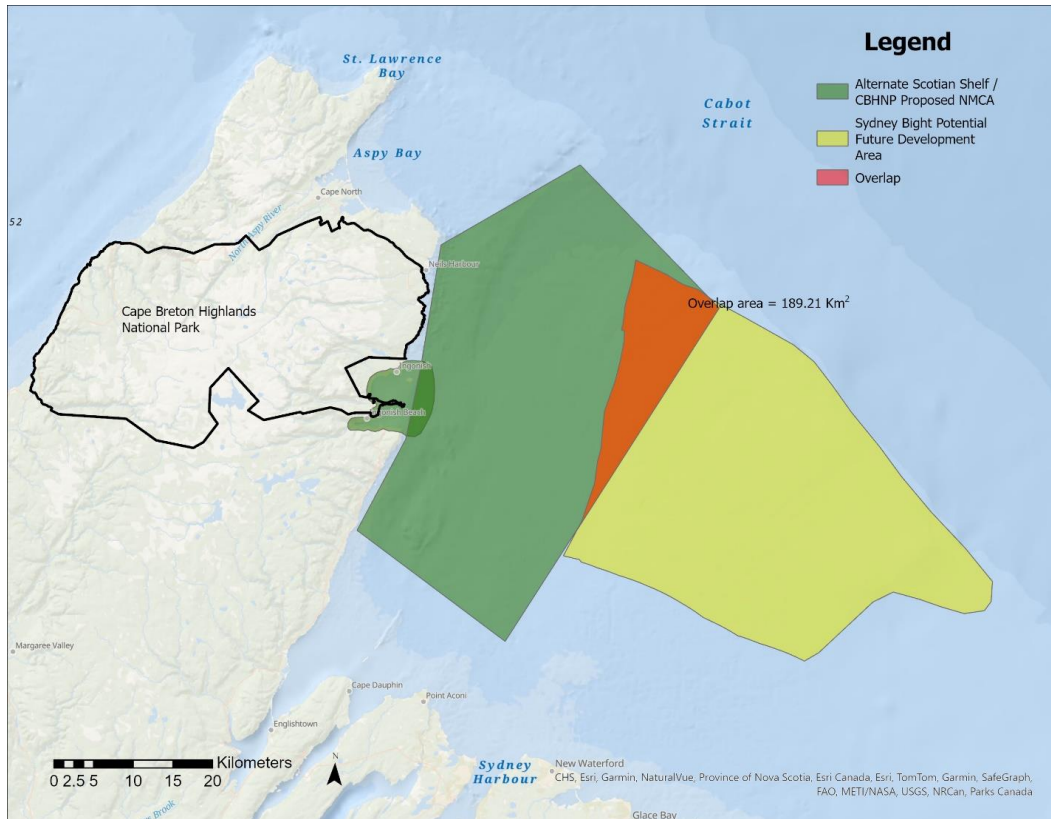


Figure 2 – Cape Breton Highlands National Park and Potential Scotian Shelf National Marine Conservation Area boundaries relative to the Sydney Bight PDA boundary