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Dear Mr Lloyd

### Interim Development Control Guidance – Onshore Wind Farm Developments

Thank you for your consultation on the above. I understand that you have undertaken two refinement exercises for the Newtown South SSA C (as set out in TAN 8). We note that the Shropshire Hills AONB Partnership was not consulted at any stage in either the preparation or the refinements of this SSA. **The AONB Partnership is concerned that the eastern section of the Refined Newtown South SSA C (as shown in the Interim Development Control Guidance, IDCG) is in very close proximity to the nationally protected landscape of the Shropshire Hills AONB.** In fact, the south eastern boundary of the Refined SSA appears to be within 3km of the AONB at Lower House Bank (near Felindre).

The IDCG indicates that there will be a presumption in favour of large wind farm (over 25MW) developments in the SSAs. Recent planning applications in the area suggest that this can mean up to 23 turbines, each 126.5 m in height, per wind farm. In addition, such large wind farms may be sited next to each other (as is the case with the Llanbadarn Fynydd and Garreg Lwyd proposals) thus amplifying their impact.

Section 85 of the Countryside and Rights of Way Act 2000 requires councils to *"have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty"*.

Planning Policy Wales (2002) considers AONBs. Paragraph 5.3.5 states that *'development control decisions affecting AONBs should favour conservation of natural beauty'*.

Paragraph 5.3.6 states that *'National Parks and AONBs are of equal status in terms of landscape and scenic beauty and both must be afforded the highest status of protection from inappropriate developments ..... and 'development control decisions should give great weight to conserving and enhancing the natural beauty, wildlife and cultural heritage of these areas.'*

Paragraph 5.3.7 states *'The duty to have regard to National Park and AONB purposes applies to activities affecting these areas, **whether those activities lie within or outside the designated areas.**'* (my emphasis).

Given the proximity of the eastern section of the Refined Newtown South C SSA to the Shropshire Hills AONB boundary, the size of wind farms permitted in this area and the potential for cumulative impacts, it is very likely that wind farm developments within this part of the Refined SSA will have a serious adverse effect on the Shropshire Hills AONB.

**The Shropshire Hills AONB Partnership strongly recommends that the eastern boundary of the Refined Newtown South SSA C be revised westwards to avoid unacceptable significant impacts on the nationally protected landscape. We recommend that the eastern boundary of the SSA be no closer to the Shropshire Hills AONB than 5km, effectively meaning that no large scale wind farms would be constructed closer to the AONB than the current proposed development at Llanbadarn Fynydd.**

Other detailed comments on the IDCG are as follows:

### **1. Section 6 – Strategic Search Areas**

Paragraph 6.1 sets out the capacity for each Strategic Search Area. It appears that these are short term capacity targets rather than longer term maximum or minimum limits. In view of recent and current planning applications in the Refined Newtown South SSA C (which together provide 96MW of the 70MW capacity) the IDCG should be clear about the status of these capacity figures.

The criteria in paragraph 6.4 should make specific reference to the impact on nationally protected landscapes, under 'Landscape factors' (the first bullet point). The IDCG suggests that these criteria are considered in assessments of all wind developments in Powys and it is important that the designated landscape of the Shropshire Hills AONB forms part of this evaluation.

### **2. Section 11 – More detailed guidance.**

Paragraph 11.1 considers the cumulative impacts of wind farm developments in the Powys SSAs. The IDCG should consider the cumulative impact of wind farm developments within the Refined Newtown South SSA C on the Shropshire Hills AONB. Paragraph 11.5 makes reference to 'communities being hemmed in by large scale wind farms'. The recent wind farm application at Llanbadarn Fynydd and the current one at Garreg Lwyd when combined with the proposal for Reeves Hill in Herefordshire would create similar cumulative effects on the Shropshire Hills AONB and the communities in the south-west part of it.

Paragraph 11.3 states that impacts on views and panoramas are important considerations and that both the wider landscape and significant receptors will form part of this assessment. The views from the Shropshire Hills AONB are one of its special qualities, and rights of way users as well as local communities within the AONB may be significant receptors. This paragraph should be amended to make it clear that the effect on nationally designated landscapes will be given special consideration, including on receptors within those landscapes.

Paragraph 11.5 advises the use of LANDMAP as the basis for landscape assessment. Shropshire has a Landscape Character Assessment and an Historic Landscape Characterisation which provide similar information to LANDMAP. The use of these data sets for assessing impacts within England should be advocated for wind developments within the Refined Newtown South SSA C.

Paragraphs 11.2 to 11.2.5 set out a protocol for dealing with the consequences of cumulative impacts. The Shropshire Hills AONB Partnership would like to be consulted as part of the Council's Development Team Protocol (paragraph 11.2.3).

Planning Policy Wales states in paragraph 5.1.5 that '*Since natural heritage issues are not confined by administrative boundaries they must be addressed strategically through consultation and collaboration with adjoining planning authorities*'. In line with this the AONB Partnership, in conjunction with our major funding partner Natural England, would welcome the opportunity to develop a protocol on cross border working to deal with planning issues which are likely to have an impact on Shropshire.

### **3. Mitigation measures and community benefit.**

The AONB Partnership is supportive of the use of planning obligations to provide community benefits in relation to wind developments. I suggest that the Council look at the feasibility of using planning obligations to realise benefits for those communities in Shropshire affected by wind developments in Powys. Following the lead in the IDCG, a fund to provide advice, support and grants for energy conservation measures in the Clun area maybe appropriate. The AONB Partnership's Sustainable Development Fund may be able to provide a delivery mechanism for this.

If you require further clarification of any of these points, please do not hesitate to contact me (see contact details above, and note that I work part-time Mon- Weds).

Yours sincerely

Joy Tetsill  
Planning and Policy Officer