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Your Ref: P2009 0384
Our Ref: ph_070509_Powys CC Bryngydfa obj

7 May 2009

Dear Steve

Application No. P2009 0384 - Construction of a twelve turbine windfarm and associated ancillary infrastructure at Bryngydfa Wind Farm, Felindre, Powys

Thank you for your consultation on this application. **The Shropshire Hills Area of Outstanding Natural Beauty (AONB) Partnership objects to this planning application.**

We note that the proposed development is in two parts which both lie immediately adjacent to the the proposed Garreg Lwyd windfarm. To all intents and purposes this is therefore a single site of 35 turbines, and the cumulative impacts of this scale of development are what the proposal needs to be judged against. **All 35 of the proposed turbines in the combined adjacent sites lie within 5km of the boundary of the Shropshire Hills AONB.** Our previous responses have indicated that land within 5km of the AONB should not be defined as a Search Area (nowhere do the defined Search Areas in Wales approach this close to a Welsh AONB or National Park). Though the Search Areas have not been refined to take this into account, we note that **the southern part of the current Bryngydfa proposal actually lies outside the refined Search Area.** This part of the application must therefore be contrary to Powys County Council's Interim Development Control Guidance (IDCG) on onshore wind farm developments. The map on page 3 of the Environmental Statement Non-Technical Summary shows the southern part of the site to be outside the refined Search Area but within the original Search Area boundary. We would suggest the fact that there is no key on the map to these boundaries is misleading and disingenuous.

The Landscape and Visual Impact Assessment part of the Environmental Statement indicates that ***"the significance of effect on the highland areas at the western boundary of the AONB is assessed as major."*** We would question the rationale by which the Assessment manages to get within a few lines from this to *"The significance of effect on the high ground areas within the Shropshire Hills AONB is therefore assessed as moderate to major"* and then to *"The overall significance of effect upon landscape character within the Shropshire Hills AONB is therefore assessed as moderate"*. The fact that the AONB is large and some parts of it are distant from the site should not allow an 'overall' assessment in relation to the whole AONB to mask the major effect in particular parts of the AONB. We note also that at Viewpoint 4 at Felindre, which lies only about 300m from the AONB boundary, the significance of effect is assessed to be moderate to major.

We note that details are not confirmed of the grid connection route for the proposal in question, but the Grid Indicative Route for the adjacent Garreg Lwyd site lies down the Upper Teme Valley partly within and immediately adjacent to the AONB. We have objected to the Grid Indicative Route application for

the the Garreg Lwyd connection, and would be opposed to this route being used for connection for the Bryngydfa wind farm.

Relevant policy background to AONBs includes the following (my emphasis added):

1. Section 85 of the Countryside and Rights of Way Act 2000 requires county councils to "**have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty**".
2. Paragraph 5.3.5 of Planning Policy Wales (2002) states that '**development control decisions affecting AONBs should favour conservation of natural beauty**'.
3. Paragraph 5.3.6 of Planning Policy Wales (2002) 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.'**
4. Paragraph 5.3.7 of Planning Policy Wales (2002) 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.'**
5. The new Shropshire Hills AONB Management Plan 2009-14 has been approved by Shropshire Council, and contains the following relevant statements:

AONB PARTNERSHIP POSITION 9 *Land within 5km of the AONB boundary is unsuitable for large scale windfarm development, and should be excluded from any Search Areas. The definition of 'large' in respect of this Position is that used by TAN 8, i.e. developments of 25MW and over.*

POLICY 36 *Decisions on proposals for wind turbines outside the AONB should take account of the potential impacts within the AONB, especially the extent of visibility and significance of viewpoints affected, and potential cumulative effects with existing structures.*

Please do not hesitate to contact me if you require clarification on any of these points.

Yours sincerely

Phil Holden
AONB Partnership Manager
for the Shropshire Hills AONB Partnership