

Mr Gwilym Davies
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Your Ref: P/2008/0785
Our Ref: ph_280613_Garreg Lwyd

28 June 2013

Dear Mr Davies

P/2008/0785 Garreg Lwyd Hill Erection of 23 Wind Turbines, Wind Monitoring Mast, Access Tracks, Crane Hardstandings, Water Crossings, Control Building, Substation Compound, Car Park, Offside Road improvements, Temporary Compounds, Borrow Pits, Masts & Welfare Facilities

Supplementary Environmental Information in support of this application has recently been brought to our attention. We wish to make further comment on the Assessment of Landscape and Visual Impacts of the proposed wind farm on the Shropshire Hills AONB.

We note that the Assessment concludes that parts of the AONB would be significantly impacted by the development in an area of the south-west Clun Forest, with which we agree. However we completely disagree with the conclusions drawn from this, that since only a small part of the AONB is significantly affected, this can be discounted. This is a spurious line of argument which by implication would afford greater protection for a smaller AONB (in which a greater proportion would be affected). There is no policy or precedent in planning decisions for such an argument, which we therefore regard as unsound.

Further, a numerical approach to assessing impacts on the number of the AONB's special qualities which are impacted is also an unsound reductionist approach aimed at underestimating the impact and not an established way of assessing effects on an AONB.

The significant impacts of this proposed development on the AONB is demonstrated by the assessment and our objection therefore stands. We urge the Council to consider Section 85 of the Countryside & Rights of Way Act, to 'have regard to the purposes of AONB designation' and reject this application.

Yours sincerely

Phil Holden
Shropshire Hills AONB Partnership Manager