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Your Ref: APP/T6850/A/13/2209593  
Our Ref: ph\_120914\_Garreg Lwyd

2 October 2014

Dear Mr Rigby

### Appeal Reference APP/T6850/A/13/2209593 Garreg Lwyd windfarm

I am writing with further comments on the appeal for this application, following the decision at the pre-inquiry meeting of 22 July 2014 to accept our further comments, for which we are grateful.

**The Shropshire Hills AONB Partnership maintains its objection to this application.** We note that the number of proposed turbines is now reduced from 23 to 17. We do not feel however that this will reduce the visual impact of the scheme on the AONB to an acceptable level. We note that the Assessment of Landscape and Visual Impacts in the latest Supplementary Environmental Information concludes that parts of the AONB would be significantly impacted in terms of both views and landscape character by the development in an area of the south-west Clun Forest, with which we agree. In our opinion, this provides grounds for the application to be refused. We completely disagree with the conclusions of the SEI, that since only a small part of the AONB is significantly affected, this can be deemed acceptable. 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.

We maintain that the development would impact negatively on the scenic and environmental quality and tranquillity of the AONB, and affect opportunities within it for enjoyment of the landscape. We are uncomfortable however with the approach in the LVIA of assessing impacts against the AONB's special qualities individually, with the apparent aim of reducing the assessment of impact overall. The special qualities are inter-related, and a development in any case need not affect any particular number of qualities to be unacceptable. The integrity and value of the AONB's landscape is made up of the quality of all the places within it, and not just through attributes generalised across the whole area. In our opinion, this development would undermine the purposes for which the AONB was designated.

The significant impacts of this proposed development on the AONB is demonstrated by the appellant's own assessment and our objection therefore stands. Policy for Valuing the AONB in Planning and Decisions in the statutory 2014-19 Shropshire Hills AONB Management Plan includes: "*Land within 5km of the AONB boundary is unsuitable for large scale windfarm development.*" We urge the Inspectorate also to consider Section 85 of the Countryside & Rights of Way Act, to '*have regard to the purposes of AONB designation*' and to reject this appeal.

Yours sincerely

Phil Holden  
Shropshire Hills AONB Partnership Manager