



Mr Andrew Francis
Carmarthenshire County Council - West
Development Control
Crescent Road
Llandeilo
SA19 6HW

Ein cyf/Our ref: SH/2014/117406/03-L01
Eich cyf/Your ref: W/30859

Dyddiad/Date: 23 January 2015

Annwyl/Dear Mr Francis

SINGLE 74M TIP WIND TURBINE AND ASSOCIATED INFRASTRUCTURE. LAND NORTH OF BLAENPIBWR, CAPEL DEWI, CARMARTHEN, SA32 8AW.

We are in receipt of a landscape and visual impact assessment, which we received on 28 November 2014.

On review of the landscape and visual impact assessment (LVIA), referenced A088110 and dated September 2014 we **object** to this proposal and recommend that it is refused due to the likely adverse effects on the Tywi Valley Registered Landscape of Outstanding Historic Interest, which is of national importance.

The Tywi Valley Landscape of Outstanding Historic Interest is one of Wales' 58 registered historic landscapes recognised as nationally important in Planning Policy Wales and a material consideration in planning terms. It is a long, narrow river valley of renowned scenic quality from its source in the south of the Cambrian Mountains to its estuary in Carmarthen Bay, containing ancient route corridors and the setting for an unrivalled group of planned landscapes. The area includes: Iron Age forts; Roman forts; medieval castles and mottes; post-medieval gentry houses, designed parks and gardens; highly cherished and celebrated historic artistic picturesque landscapes.

We consider that the sensitivity of viewers and the significance of the effects on the Tywi Valley have been underestimated and that the wind turbine would be a prominent, large scale, intrusive modern structure in a number of sensitive views. We consider that the effects on the historic landscape would be significant and adverse.

The turbine would be located outside but adjacent (approximately 200m from the boundary) to the Tywi Valley Landscape of Outstanding Historic Interest. There are highly sensitive, high quality views across and along the Tywi Valley, which are

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currently scarcely affected by modern development or large structures of this height and scale. Historic structures are a feature of views for example, Paxton's Tower and Dryslwyn and Dynefor castles. The landscape is strongly historic in its character and as stated above the 74m high wind turbine would be a prominent, intrusive modern structure in a number of sensitive views.

The LVIA recognises that the landscape character of the locality and Tywi Valley is of high sensitivity, as it is very strongly rural without tall modern structures of this scale. It states that major or moderate-major effects are considered 'significant' in terms of Environmental Impact Assessments (EIA). We also consider that moderate effects are normally classed as 'significant' in EIA.

The LVIA considers viewers from public rights of way to be of only medium sensitivity, however, the 'Guidelines for Landscape and Visual Impact Assessments' indicates that users of public rights of way are likely to be most susceptible to change where their attention or interest is likely to be focused on the landscape and on particular views. Given the outstanding scenic quality and historic interest of the Tywi Valley we consider that these receptors would be focussed on the landscape and would be highly sensitive. The LVIA assesses the effect on footpaths to the south-east, but not to the north, within the Tywi Valley or at Merlin's Hillfort, an important historic feature 5km to the north-west. The assessment states that the turbine does not align with identified significant views from Paxton's Tower, however it lies directly within the view to the west from the ground at the foot of the tower and from the first floor window.

The LVIA concludes that moderate adverse effects would be experienced within 2km of the turbine and beyond this it would not be a prominent feature in the landscape, with limited views from high ground on the north side of the Tywi Valley and to the south-east. We do not agree with this assessment and consider that the turbine would be prominent in views from viewpoints 2 (Paxton's Tower), 10 (A40 White Mill), 12 (Nantgaredig) 25 (B4310 North of Rock Hill), 26 (Llanegwad Church) and 30 (South of Capel Dewi), all within 5km and within the Outstanding Historic Landscape. It would also be very noticeable from viewpoint 27 (Dryslwyn Castle) and is likely to be prominent from open views along the A40 between Nantgaredig and White Mill, and from public footpaths on the north side of the river including Merlin's Hill. It should be noted that the existing turbine at Nantycaws Landfill Site (2.5km from Blaenpibwr) is very noticeable from the foot of Paxton's Tower and car park and noticeable in other more distant views (for example viewpoints 5 and 13). However, in the visualisations it is barely discernible. The visualisations do not appear to accurately represent the level of detail seen in the field. We would generally recommend that single frame photographs (40 degree horizontal angle of view) are taken from key viewpoints to accompany the panoramas, which provide context.

The turbine also lies within the Visual and Sensory aspect area CRMRTVS960 Middleton Hills, classed as Moderate by LANDMAP. The site lies on undulating high ground to the south and above the Tywi Valley. The area is described as tranquil and relatively unaffected by modern development. The dome of the National Botanic Garden building is visible from places within the area, along with the A48. Whilst the area overall is considered to be of moderate scenic quality and character, the views are considered to be of high scenic quality, and are a particular feature. There are attractive views to and from the Tywi Valley and the guideline for the area is to safeguard the rural feel, which is largely unspoilt.

The adjacent LANDMAP Visual and Sensory aspect areas on the south and north slopes of the Tywi Valley, and the Tywi floodplain are classed as Outstanding by LANDMAP for their scenic quality and character. This reflects the scenic quality

recognised by the historic landscape designation and arising principally from the historic character. A number of sensitive views from within these outstanding areas would be affected by the turbine, which we consider, would be visually intrusive.

Finally, the LVIA concludes that the landscape would not become a landscape with wind turbines and the cumulative effects would be acceptable. We consider that turbines would become a key characteristic of the landscape between Blaenpibwr and Llanddarog and of the view west from Paxton's Tower.

In summary, we recommend **refusal** of the application due to the likely adverse effects on the Tywi Valley Registered Landscape of Outstanding Historic Interest, which is of national importance.

Notwithstanding the above comments we recognise that you will need to consider a range of matters whilst making your determination of the application. Therefore, should you be minded to grant planning permission for the proposed turbine the following comments in respect of European Protected Species (EPS) are also applicable.

We welcome the submission of the following reports:

- Extended Phase 1 Habitat Survey Report. Celt 1 Wind Turbine for Seren Ecology. Dated 8 September 2014. Prepared by Sylvan Ecology.
- Bat Survey Report. Celt 1 Wind Turbine for Seren Ecology. Report Ref: F010/BA Report-V.1.2. Dated 7 September 2014. Prepared by Sylvan Ecology.
- Bat Survey Report. Celt 1 Wind Turbine for Seren Ecology. Report Ref: F010/BA Report-v2.3. Dated 12 November 2014. Prepared by Sylvan Ecology.

As your Authority is aware all species of British bats are EPS, legally protected under The Conservation of Habitats and Species Regulations 2010 (as amended). Legal protection relates to the animals themselves and the places they use to rest and breed.

Where an EPS is present and development proposal is likely to contravene the legal protection they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three requirements set out in the legislation. One of these requires that the development authorised will 'not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status (FCS) in their natural range'.

These requirements are translated into planning policy through Planning Policy Wales (PPW) July 2014, section 5.5.11 and 5.5.12, and Technical Advice Note (TAN) 5 , Nature Conservation and Planning (September 2009). Your Authority should take them into account when considering development proposals where an EPS is present.

From the aforementioned reports we note that a total of eight species of bat were observed at, or close to, the proposed turbine location, including Noctule bats, a species at risk from collision from wind turbines. We also note the mitigation proposals to include siting the turbine away from the field boundaries in accordance with guidance in Natural England's TIN051 Bats and Onshore Wind Turbines, and turbine operating restrictions. Subject to the implementation of these proposals, we are of the view that there is unlikely to be a detrimental effect on the maintenance of the favourable conservation status of the bat species present. However, the following point should be included as an appropriately worded condition within any consent granted.

- No development shall take place until a curtailment plan (informed by Section 4.6 (Suggested Operating Parameters) of the November 2014 Bat Report by Sylvan Ecology) has been submitted and approved in writing by the Local Planning

Authority. The curtailment plan shall include the following:

- (a) The times of the day when curtailment will restrict operations;
- (b) The times of the year when curtailment will restrict operations;
- (c) The weather conditions (temperature, wind speed and precipitation) when curtailment will restrict operations
- (d) Technical specifications of equipment to evidence suitability for curtailment purposes;
- (e) Mechanisms that will be undertaken to evidence and audit implementation of curtailment plans; and

The Curtailment Plan shall be implemented in accordance with the approved details.

I hope the above comments are of assistance however, should you wish to discuss the application further please do not hesitate to contact Bonnie Palmer on 0300 065 3282 or via email bonnie.palmer@cyfoethnaturiolcymru.gov.uk.

Yn ddiffuant / Yours sincerely

Pete Jordan

Development Planning Manager, Operations South

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