

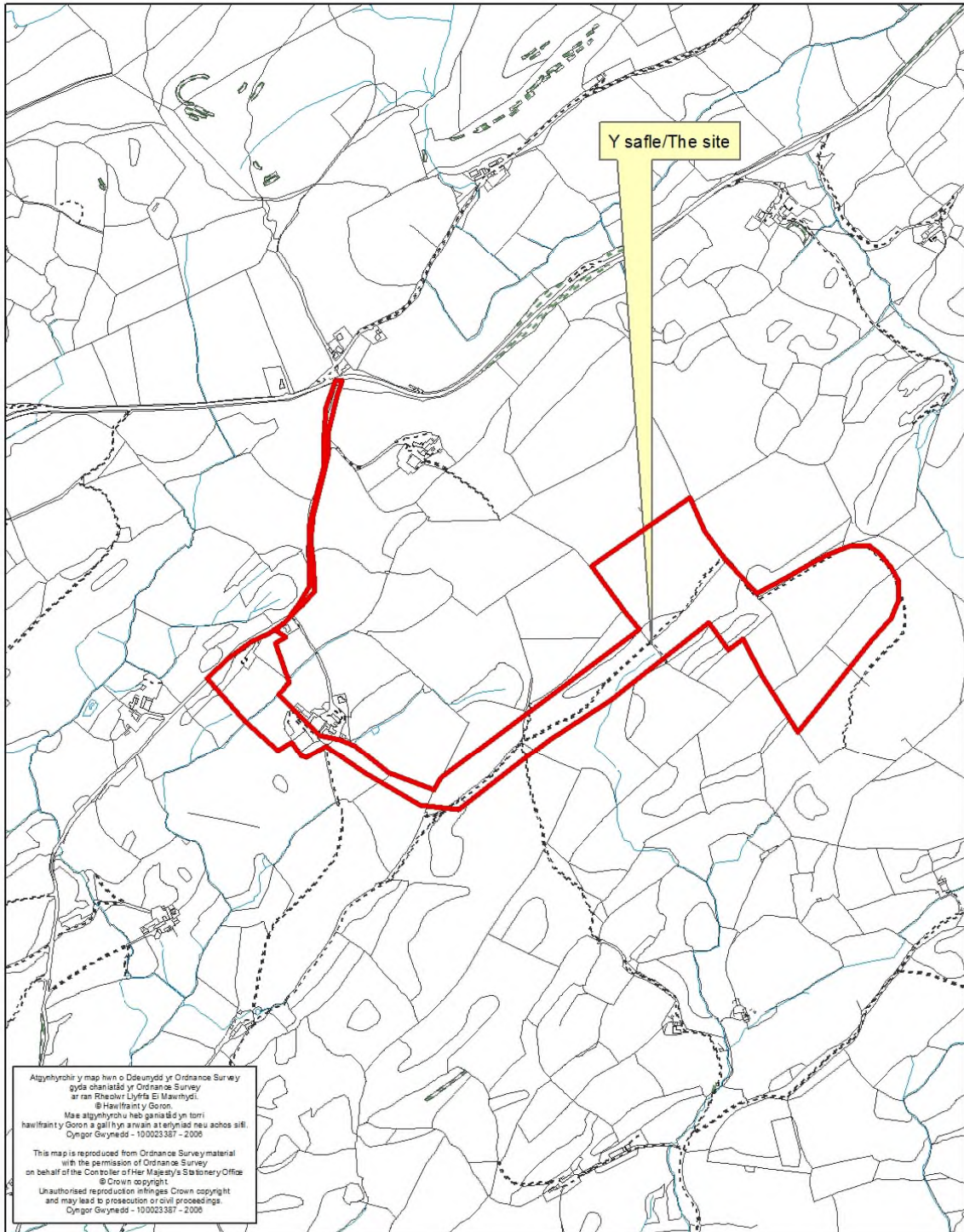
PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

Number: 1



Rhif y Cais / Application Number : C14/0291/04/LL

**Cynllun lleoliad ar gyfer adnabod y safle yn unig. Dim i raddfa.
Location Plan for identification purposes only. Not to scale.**



PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

Application No: C14/0291/04/LL
Registration Date: 23/07/2015
Application Type: Full - Planning
Community: Llandderfel(inc. Llanfor)
Ward: Llandderfel

Proposal: ERECT 2 WIND TURBINES 57M TO THE HUB WITH TOTAL HEIGHT OF 92.5M (INSTEAD OF 115M) TO THE TIP OF THE BLADE (MAXIMUM OUTPUT 5MW) TOGETHER WITH TRACK, BUILDING AND ASSOCIATED EQUIPMENT.

Location: LAND NEAR BODELITH ISAF, LLANDDERFEL, BALA, GWYNEDD, LL23 7LA

Summary of the recommendation: TO REFUSE

1. Description:

1.1 The application under consideration is for the erection of two three bladed wind turbines with a hub height of 57m, rotor diameter of 71m and tip height of 92.5m with a maximum installed capacity of 2.5MW each. The original application submitted sought permission to erect two three bladed wind turbines measuring 115m to tip height. In response to consultation responses and objections the scheme was reduced.

1.2 In addition to the two turbines the scheme also includes:

- Construction of foundations for each turbine, approximately 15m² and 2m deep.
- Possible siting of a transformer adjacent to each turbine within a steel box measuring 3 x 2.5 x 2.5m.
- Lay underground cabling connecting the turbines to a wind farm sub station.
- Construction of an electrical substation and Control Building and enclosed by a 2m high Security fence.
- Construction of 5m wide crushed stone access tracks from the highway to the site.
- Construction of temporary security compounds to house equipment and materials and site a security office.
- Construction of two crane pads 990m² each. Approximately a third of the area will be covered up and dressed with topsoil and landscaped upon erection of the turbines. The remainder to be kept uncovered to facilitate service and repair of the turbines.

1.3 The application site is located on agricultural land on the western side of Mynydd Mynyllod. To the north east of the site there is the Mynydd Mynyllod Scheduled Ancient Monument and beyond that three operational wind turbines at Braich Ddu. To the south west there are also two operational wind turbines at Syrior which is located within Denbighshire.

1.4 There are numerous residential dwelling houses dispersed throughout the countryside with the nearest being approximately 450m from the turbines at Ty'n Fedw and Cistfean. The village of Llandderfel is located approximately 2.5km to the south west. To the west there are a number of dwelling houses dispersed through Bethel. Bethel lies on lower land adjacent to the A494 and between the higher areas of Mynydd Mynyllod and Cefn Cae'r Euni. The Chapel at Bethel is a Grade II listed building. The Environmental Statement (ES) has assessed there are 116 Listed Buildings within the 5km study area, most of which are located within Llandderfel and Llandrillo. The ES has also identified there are fourteen Scheduled Ancient Monuments within the 5km study area.

1.5 The following landscape designations are also relevant to the application:

- Clwydian Range and Dee Valley AONB is approximately 7km to the north east.

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

- Snowdonia National Park is approximately 4.5km to the south and over 8km away to the west.
- Berwyn Landscape of Outstanding Historic interest is located just over 5km to the south east.
- Bala and Bala Lakes Landscape of Outstanding Historic Interest is located approximately 4.5km to the south west

1.6 The following documentation has been submitted to support the application:

- Design & Access statement
- Planning Statement
- Non Technical Summary
- Volume 1 Report to the Environmental Statement covering the following:
 - Introduction
 - Environmental Impact Assessment
 - Scoping & Consultation
 - Site Selection
 - Description
 - Energy & planning policy
 - Landscape & Visual
 - Historic Environment
 - Non-Avian and Nature Conservation
 - Ornithology
 - Noise
 - Water Resources and Ground Conditions
 - Traffic and Transport
 - Socio Economics and Land Use
 - Electromagnetic Interference, Shadow Flicker, Telecommunications, Aviation & Health & Safety.
- Volume 2 to the Environmental Statement – figures, part of which includes:
 - Detailed plans and figures
 - Viewpoint assessments supported by wireframes and photomontages.
 - Zones of theoretical visibility
 - Cumulative zones of theoretical visibility.
 - Landscape designations
 - Shadow flicker study area and assessment results.
 - Landmap Evaluations
 - Noise Assessments
- Volume 3 to the Environmental Statement – Appendices.

1.7 In addition to the above documentation a number of additional documents were submitted in response to the consultation process. These documents included:

- Technical note: Review of the Anglesey, Gwynedd and Snowdonia Landscape Sensitivity and Capacity Study with regard to the Bodelith Isaf Wind Farm Proposal.
- Addendum to Chapter 14 of the Bodelith Isaf Wind Farm – in response to the comments received from the Private Rights of Way Unit.
- LVIA Technical Note in response to the comments received from the Snowdonia National Park Authority and Denbighshire County Council.
- Comments on Responses to the Historic Environment Assessment.

1.8 Following receipt of an amended scheme to reduce the height of the turbines to 92.5m the following amended documentation was received:

- Design & Assess Statement.

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

- Volume 1 Updated Planning Submission – the document confirms that all the other elements of the original application, including the installed capacity will remain the same. The document assesses the effects of the reduced scheme.
- Volume 2 Figures Updated Planning Submission – the document includes updated photomontages, wireframes and other assessments relevant to the amended scheme.

2. Relevant Policies:

2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and paragraph 2.1.2 of Planning Policy Wales emphasise that planning decisions should be in accordance with the Development Plan, unless material planning considerations indicate otherwise. Planning considerations include National Planning Policy and the Unitary Development Plan.

2.2 Gwynedd Unitary Development Plan 2009:

TAKING A PRECAUTIONARY APPROACH - STRATEGIC POLICY 1

Development proposals that would have an adverse or uncertain impact on the environment, the economy or cultural character (including the Welsh language) of the Plan area will be refused unless it can be conclusively shown by an appropriate impact assessment that this can be negated or mitigated in a manner acceptable to the Planning Authority.

STRATEGIC POLICY 2 – THE NATURAL ENVIRONMENT

The area's natural environment and its landscape character, and views in and out of the Snowdonia National Park and the Anglesey and Llŷn Areas of Outstanding Natural Beauty, will be maintained or enhanced by refusing development proposals that will significantly harm them.

STRATEGIC POLICY 3 – BUILT AND HISTORIC HERITAGE

The area's built and historic heritage will be protected from development that would significantly harm it, and new developments in historic areas will be expected to conform to particularly high design standards which will maintain or improve their special character.

DESIGN STANDARDS – STRATEGIC POLICY 4

Development will be expected to be of a good design in order to ensure that it makes a positive contribution, wherever possible, to the landscape, built environment and sustainable development.

DEVELOPMENTS WHICH CREATE RISK – STRATEGIC POLICY 5

Developments that are inconsistent with the need to safeguard floodplains or to minimise flood risk and developments that create a risk of unacceptable damage to health, property or the environment, will be refused.

STRATEGIC POLICY 9 – ENERGY

Development proposals to provide energy from renewable sources will be approved provided they do not significantly harm the environment or the amenities of nearby residents.

POLICY A1 - ENVIRONMENTAL OR OTHER IMPACT ASSESSMENTS

Ensure that sufficient information is provided with the planning application regarding any environmental impacts or other likely and substantial impact, in the form of an environmental assessment or assessments of other impacts.

POLICY A2 - PROTECT THE SOCIAL, LINGUISTIC AND CULTURAL FABRIC OF COMMUNITIES

Safeguard social, linguistic or cultural solidarity within communities against significant harm due to the size, scale or location of proposals.

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

POLICY A3 - PRECAUTIONARY PRINCIPLE

Refuse proposals if there is any possibility of serious or irreversible damage to the environment or the community unless the relevant impact assessment can show beyond doubt at the end of that the impact can be avoided or alleviated.

POLICY B3- DEVELOPMENTS AFFECTING THE SETTING OF LISTED BUILDINGS

Ensure that proposals have no adverse effect on the setting of Listed Buildings and that they conform to a number of criteria aimed at safeguarding the special character of the Listed Building and the local environment.

POLICY B7- SITES OF ARCHAEOLOGICAL IMPORTANCE

Refuse proposals which will damage or destroy archaeological remains which are of national importance (whether they are registered or not) or their setting. Also refuse any development which will affect other archaeological remains unless the need for the development is greater than the significance of the archaeological remains.

POLICY B12 - PROTECTING HISTORICAL LANDSCAPES, PARKS AND GARDENS

Safeguard landscapes, parks and gardens of special historical interest in Wales from developments which would cause significant damage to their character, their appearance or their setting.

POLICY B14 - PROTECTING THE LANDSCAPE CHARACTER OF SNOWDONIA NATIONAL PARK

Safeguard the character of the Snowdonia National Park landscape by refusing proposals which are visually obtrusive and/or are located insensitively and uncongenially within the landscape.

POLICY B15 - PROTECTION OF INTERNATIONAL NATURE CONSERVATION SITES

Refuse proposals which are likely to cause significant damage to the soundness of nature conservation sites of international importance unless they conform to a series of criteria aimed at the management, enjoyment and protection of recognised features within such sites.

POLICY B16 - PROTECTING NATIONALLY IMPORTANT NATURE CONSERVATION SITES

Refuse proposals which are likely to cause significant damage to nature conservation sites of national importance unless they conform to a series of criteria aimed at the management, enjoyment and protection of recognised features within the sites.

POLICY B17 - PROTECTING SITES OF REGIONAL OR LOCAL SIGNIFICANCE

Refuse proposals which are likely to cause significant damage to sites of regional or local significance unless they conform to a series of criteria aimed at the management, enjoyment and protection of recognised features within the sites.

POLICY B19 - PROTECTED TREES, WOODLAND AND HEDGEROWS

Refuse proposals which involve loss of or damage to protected trees, woodlands or hedgerows unless the economic and/or social benefits of the development outweigh any damage.

POLICY B20 - SPECIES AND THEIR HABITATS THAT ARE INTERNATIONALLY AND NATIONALLY IMPORTANT

Refuse proposals which are likely to cause disturbance or unacceptable damage to protected species and their habitats unless they conform to a series of criteria aimed at safeguarding the recognised features of the site.

POLICY B22 - BUILDING DESIGN

Promote the design of good buildings by ensuring that proposals conform to a series of criteria aimed at protecting the recognised features and character of the local landscape and environment.

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

POLICY B23 - AMENITIES

Safeguard the amenities of the local area by ensuring that proposals conform to a series of criteria aimed at protecting the recognised features and amenities of the local area.

POLICY B25 - BUILDING MATERIALS

Safeguard the visual character by ensuring that the building materials are of high standard and in keeping with the character and appearance of the local area.

POLICY B32 - INCREASING SURFACE WATER

Refuse proposals which do not include flood reduction measures or appropriate alleviating measures which will lead to a reduction in the volume and scale of surface water reaching and flowing into rivers and other water courses.

POLICY B33 - DEVELOPMENTS THAT CREATE POLLUTION OR NUISANCE

Protect human amenities, health quality and the natural or built environment from high levels of pollution

POLICY B34 - LIGHTING AND LIGHT POLLUTION

Ensure that proposals do not substantially impair amenity use of adjoining land and the environment.

POLICY C1 - LOCATING NEW DEVELOPMENTS

Land within town and village boundaries and the developed form of rural villages will be the main focus for new developments. New buildings, structures and supplementary facilities in open countryside will be refused with the exception of a development which is permitted under another policy within the Plan.

POLICY C26 - WIND TURBINE DEVELOPMENTS

Proposals for wind turbine developments on sites within the Llyn AONB will be refused. In other locations, only proposals for wind turbine developments on a small scale or for community or domestic use will be permitted, provided they conform with a series of criteria regarding the impact on the visual quality of the landscape and other social and environmental factors.

POLICY C28 - SAFEGUARDING AGRICULTURAL LAND

Proposals which would lead to the loss of grades 1, 2 or 3a agricultural land will be refused unless it can be shown that there is overwhelming need for the development, and proved that there is no previously developed land available and that there is no land of lower agricultural grades available apart from land of environmental value which outweighs agricultural considerations.

POLICY C29 - SAFEGUARDING WATER RESOURCES

Proposals which would cause significant damage to surface water, land water sources or fresh water ecosystems and which could not be alleviated or effectively managed will be refused.

POLICY CH22 - CYCLING NETWORK, PATHS AND RIGHTS OF WAY

All parts of the cycling network, footpaths and rights of way will be protected by encouraging proposals to incorporate the above satisfactorily within the development and by refusing proposals which will prohibit plans to extend the cycling network, footpaths or rights of way. If this is not possible, appropriate provision will have to be made to divert the route or to provide a new and acceptable route.

POLICY CH28 - IMPACT OF DEVELOPMENT ON JOURNEYS

Proposals for developments on a large scale will be refused if they cause a substantial increase in the number of journeys made in private vehicles where measures to reduce the environmental impact have not been introduced. Developments which are planned and designed in a way that promotes the most acceptable environmental and sustainable modes of transport will be favoured.

POLICY CH33 - SAFETY ON ROADS AND STREETS

Development proposals will be approved if they can conform with specific criteria regarding the vehicular entrance, standard of the existing road network and traffic calming measures.

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

POLICY CH34 - RURAL LANES

Development proposals will be refused if they cause an unacceptable increase in the number of vehicles using Rural Minor Roads where the main users are expected to be pedestrians, cyclists or horse riders.

POLICY CH36 - PRIVATE CAR PARKING FACILITIES

Proposals for new developments, extension of existing developments or change of use will be refused unless off-street parking is provided in accordance with the Council's current parking guidelines, and having given due consideration to accessibility of public transport, the possibility of walking or cycling from the site and the distance from the site to a public car park.

SUPPLEMENTARY PLANNING GUIDANCE - ONSHORE WIND ENERGY (June 2014)

SUPPLEMENTARY PLANNING GUIDANCE - PLANNING OBLIGATIONS (November 2009)

SUPPLEMENTARY PLANNING GUIDANCE – LANDSCAPE CHARACTER (November 2009)

SUPPLEMENTARY PLANNING GUIDANCE – WILDLIFE SITES (April 2010)

2.3 National Policies & Guidance:

Planning Policy Wales, Welsh Government (Seventh Edition, July 2014)

Technical Advice Note (Wales) 5, Welsh Assembly Government: Nature Conservation and Planning (September 2009)

Technical Advice Note (Wales) 8, Welsh Assembly Government: Renewable Energy (July 2005)

Technical Advice Note (Wales) 11, Welsh Assembly Government: Noise (1997)

Technical Advice Note (Wales) 12, Welsh Assembly Government: Design and Access Statements (2009)

Circular 60/96 *Planning and the Historic Environment: Archaeology.*

Circular 61/96 *Planning and the Historic Environment: Historic Buildings and Conservation Areas.*

2.4 Other Material Considerations:

Landmap Information Advice Note, Countryside Council for Wales, Number 3 – *Landscape and Visual Assessment of Onshore Wind Turbines* (June 2010).

Isle of Anglesey, Gwynedd and Snowdonia National Park Landscape Sensitivity and Capacity Assessment. March 2014

3. Relevant Planning History:

3.1 C14/0390/04/LL - Temporary permission to site a 80.2 meter anemometer mast to measure the wind. Approved 22/09/14

4. Consultations:

Community / town council:

First response:

Objection because of the height and effect it will have on the area, the Berwyn and the National Park there was also concern regarding the environmental

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

impact on the area around the site.

Comments in response to the amended scheme:

Unanimous agreement to object because of the height and effect it will have on the beauty of the adjacent areas, the Berwyn and the National Park. There was also concern regarding the environmental impact on the area around the site and short term effects during the construction phase and long term impacts after the work is completed.

Cadw

First response:

The proposed development is located in the vicinity of the scheduled ancient monuments known as:

ME090 Mynydd Mynyllod Enclosure
DE230 Craig yr Uchain
DE287 The Holyhead Road: Ty Nant section
ME015 Caer Euni Camp
ME027 Pont Fawr
ME040 Caer Euni Stone Circles
ME063 Cefn Ddwysarn Camp
ME091 Y Gaerwen Enclosure, Llangar
ME227 Cefn Caer Euni Round Cairn
ME228 Maen y Rhos Standing Stone

The Historic Environment Chapter (chapter 8) of the Environmental Statement accompanying this application identifies that the proposals will impact on the setting of the scheduled ancient monument (SAM) Mynydd Mynyllod Enclosure (ME090). The chapter identifies that the proposed turbine development will be prominent in the views out from this site and will result in a high magnitude of change to some views from the site. The chapter also discusses the inter-visibility of this site with other broadly contemporary upland sites including, Caer Euni Camp (ME015), Y Gaerwen Enclosure (ME091) and Cefn Ddwysarn (ME063).

The conclusions of this chapter (as detailed in table 8.7) state that the magnitude of change on these sites is low, the effect of development moderate and the significance of that effect, not significant as a result. However, in Cadw's view these conclusions have been influenced by several erroneous premises:

- That the prominence of a development in relation to an ancient monument is reduced where the monument has panoramic or extensive views.
- That the heritage value of a monument will be effectively reduced if there is a need for some academic reconstruction of the monument for the appreciation of the contribution of setting to its heritage interest.
- That 'broadly contemporary sites' must have a proven connection between them in order for any inter-visibility to be considered significant.
- That the effect of the proposed development is somehow reduced by the visibility of the existing Braich Du turbines, rather than conversely the cumulative effect meaning the impact is greater.

No photomontage has been included from Mynydd Mynyllod, Caer Euni or any other SAM to allow the level of impact to be properly considered by Cadw but given the proximity of Mynydd Mynyllod to the development site, the nature of the intervening topography and the discussion provided in the heritage assessment (pages 200-201) the level of impact can be assumed to be

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

significant and therefore, detrimental. The impact on Caer Euni camp, Caer Euni Stone Circle and Cefn Caer Euni Round Cairn may also be adverse.

In response to CADW's initial comments the applicant responded with a formal response which broadly disagreed with CADW's findings. In response CADW provided the following comments:

As detailed in our initial response date 25 July 2014, CADW disagrees with the assessment supporting the application and considers that the impacts on the setting of at least one of the nearby Scheduled Ancient Monuments will be significant. A photomontage of views from all of the surrounding scheduled ancient monuments would allow further consideration in this respect but based on the current supporting information, the impact on the setting of Mynydd Mynyllod Enclosure (ME090) is a particular concern.

Furthermore and in response to the cumulative effects mentioned in the penultimate paragraph of the AMEC letter (dated 21st August 2014) CADW would disagree with the statement that 'the effect of the existing Braich Ddu turbines in isolation is not already significant'. The Braich Ddu development was consented almost 10 years ago when approaches to assessing setting impacts were less well established and experience of the impacts of turbines on the settings of historic places was less well evidenced. In this context the effect of the proposed Bodelith Isaf turbines could be considered to further erode the settings of the surrounding monuments.

Comments in response to the amended scheme:

The proposed development is located within the vicinity of the nationally important scheduled monuments known as Mynydd Mynyllod Enclosure (ME090), Craig yr Uchain (DE230), The Holyhead Road: Ty Nant section (DE287), Caer Euni Camp (ME015), Pont Fawr (ME027), Caer Euni Stone Circles (ME040), Cefn Ddwysarn Camp (ME063), Y Gaerwen Enclosure, Llangar (ME091), Cefn Caer Euni Round Cairn (ME227) and Maen y Rhos Standing Stone (ME228).

Having carefully considered the information provided with the planning application we **object** to the impact of the development on the setting of Mynydd Mynllod Enclosure, Caer Euni Camp, Caer Euni Stone Circles and Cern Caer Euni Round Cairn. CADW considers that the proposed development will have a significantly adverse impact on the setting of these nationally important monuments. The detail of our analysis is explained below and a description of the monuments and their importance is attached to this letter.

Policy and Guidance Concerned with the Historic Environment.

Applications for planning permission are considered in light of the Welsh Government's land use planning policy and guidance contained in Planning Policy Wales (PPW), technical advice notes and circular guidance. PPW explains that the desirability of preserving an ancient monument and its setting is a material consideration in determining a planning application whether that monument is scheduled or not. Furthermore, it explains that where nationally archaeological remains, whether scheduled or not, and their settings are likely to be affected by proposed development, there should be a presumption in favour of their physical preservation in situ. Paragraph 17 of Circular 60/96, Planning and the Historic Environment: Archaeology, elaborates by explaining that this means a presumption against proposals which would involve significant alteration or cause damage, or which would have a significant

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

impact on the setting of visible remains. PPW also explains that local authorities should protect parks and gardens and their settings included in the first part of the Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales. In addition, Gwynedd Council's Unitary Development Plan explains that proposals that will damage or destroy archaeological remains of national importance (whether scheduled or not) or their setting will be refused.

Analysis.

This application is a revised proposal for two wind turbines reduced from 115m to 92.5m to blade tip height. Under the classifications set out in the Welsh Government published '*Practice Guidance: Planning implications of renewable and low carbon energy development*' (February 2011) this wind farm comprises two 'large' sized turbines of between 65m and 135m in height.

The turbines are proposed to be located on high ground on the south side of a valley which runs south west – north east to the south of Cefn Caer Euni. The ridge formed by Cefn Caer Euni is a well preserved upland landscape rich in prehistoric archaeological remains many of which are recognised as nationally important through their designation as scheduled monuments. On the opposing flank of the valley Mynydd Mynyllod Enclosure remains a prominent summit monument which is inter-visible with the Cefn Caer Euni landscape. The existing wind turbine development at Braich Ddu is situated at the east end of the valley immediately opposite Caer Euni Camp whilst this proposal is to be situated at the west end of the valley, opposite Cefn Caer Euni Round Cairn and most proximate to Mynydd Mynyllod Enclosure.

Despite previous requests, no photomontage has been provided to aid visualisation of the development when viewed from the scheduled monuments affected by the proposal. However, some wireframe models have been produced and these have been useful to demonstrate the effect of the reduction in height from 115m to 92.5m and to help inform understanding of potential impacts.

The proposed reduction in height has some visual effect from more distant vantages particularly the views from Y Gaerwen Enclosure where one of the turbine hubs is no longer visible from the site. However, more generally and certainly from those monuments closer to the proposed development site, the reduction in height results in only a very small reduction in effect. In particular, the views from Mynydd Mynyllod Enclosure – a prehistoric settlement site defended by a stone bank and natural outcrops, a rare example in this area - continue to be adversely affected by the proposals. Due to the local topography and the nature of the site the proposed turbines occupy the closest summit to the monument, despite being 800m from it. As such, the development will dominate its setting and distract views from the site to the south west.

The updated Planning Statement (AMEC, Foster, Wheeler, July 2015) highlights that the proposed turbines will not be visible in the same views as those constructed at Braich Ddu when viewing from Mynydd Mynyllod. However, figures 2.14a / 2.14b and Figure 2.15 illustrate that both wind farms will be highly visible when viewed from Cefn Caer Euni and all of the monuments which occupy the ridge including Caer Euni Camp (ME015), Caer Euni Stone Circle (ME040) and Cefn Caer Euni Round Cairn (ME227). When viewed from the landscape of monuments along the Caer Euni ridge the visual intrusion of the Braich Ddu turbines is clear. The development of further large turbines in this locality will only increase the sense of enclosure by introducing

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

further visually prominent, vertical moving, man-made structures into a landscape notable for the range and extent of visible relict prehistoric monuments, many of which have been designated as being of national importance.

In conclusion, Cadw considers that the proposal will **have a significantly damaging adverse impact** on the settings of Mynydd Mynllod Enclosure, Caer Euni Camp, Caer Euni Stone Circles and Cern Caer Euni Round Cairn. These comments are given without prejudice to the Welsh Ministers' consideration of the planning application, should it come before them formally for determination.

Natural Resources
Wales:

First response:

NRW would object to issue of consent for this proposal unless additional information can show it would not have adverse effects on the favourable conservation status of Bats.

Sites

NRW agree with the 'Information for Habitat Regulations Assessment' report conclusion of no impact on the River Dee and Bala Lake SAC, assuming that the proposed mitigation is achieved. The proposals will not affect, either directly or indirectly, the features, functionality or integrity of any statutory protected sites of ecological, geological or geomorphologic interest.

Peat

NRW are satisfied with the outcome of the Summary Findings of Peat Report (Marc Alonzi, Walters (UK) Ltd, 07/02/2014). The report states that the deposits of peat >0.5m was limited to two main areas (Area 1 & Area 2). Neither of the two turbines or the substation or construction compounds would be located on either of these areas. However, the access track would be located close to Area 1 in parts. NRW agrees with the conclusion of this report that 'it would be beneficial for the proposed access track to be located as far from the peat as practical' in Area 1 and to 'ensure run off from higher ground into this area is maintained' in Area 2. Any changes in the position of the access track would need to be shown on a plan and be to the satisfaction of the Local Planning Authority. It would also be necessary to show what mechanism would be employed to ensure the maintenance of the run off.

Protected Landscapes

The proposal is not located within or immediately adjacent any protected landscapes, however, we note that the turbine will be located approximately 7km from the Bryniau Clwyd a Dyffryn Dyfrdwy Area of Outstanding Natural Beauty. We remind you of your Authority's duty under Section 85 of the Countryside and Rights of Way Act 2000 which requires public bodies to have regard to the purposes of conserving and enhancing the natural beauty of the AONB. The statutory purposes of Areas of Outstanding Natural Beauty are conservation and enhancement of natural beauty. The turbine will also be located approximately 4km from the Snowdonia National Park. We recommend that you consult with the Snowdonia National Park Authority regarding the turbines visual effect on the National Park.

The proposal has the potential to have cumulative impacts on local and/or regional landscape interests, and we recommend that you liaise with your internal landscape specialist. The Authority's assessment of cumulative impacts should include other energy development projects, including those

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

consented or submitted as a planning application, as well as projects that can be reasonably foreseen.

To conclude, we can give further views when provided with the information indicated above. NRW would object to issue of consent for this proposal in the meantime.

Comments in response to the amended scheme:

Bats

We have no objection to the proposal, provided any permission is subject to the imposition of a condition requiring, prior to the commencement of development, the submission of a curtailment mitigation plan for approval and implementation to the satisfaction of the LPA in consultation with NRW .

We welcome the offer of this mitigation strategy (as proposed by Amec Environmental & Infrastructure UK Limited), which we consider to be principally based on curtailing the operation of the turbine. An appropriate curtailment plan must specify the curtailment parameters including timing, weather conditions and duration of curtailment, e.g. at night (when bats are in flight) during the main season of bat activity (April to October). We also advocate confirmation that specifications of the turbine are reviewed to confirm that it is suitable for the purposes of being able to be curtailed.

Landscape

NRW's landscape remit is concerned with the effects of development upon the landscape and visual amenity of National Parks, AONBs and the Register of Landscapes of Historic Interest in Wales.

The proposal may affect Snowdonia National Park. We remind you of your Authority's duty under Section 62 of the Environment Act 1995 which requires public bodies to have regard to National Park purposes when coming to decisions relating to or affecting land within a National Park. The statutory purposes of National Parks are conservation and enhancement of natural beauty, wildlife and cultural heritage and promoting opportunities for public understanding and enjoyment of its special qualities.

The proposal may affect the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty. We remind you of your Authority's duty under Section 85 of the Countryside and Rights of Way Act 2000 which requires public bodies to have regard to the purposes of conserving and enhancing the natural beauty of the AONB. The statutory purposes of Areas of Outstanding Natural Beauty are conservation and enhancement of natural beauty.

The proposal may affect the Berwyn Landscape of Special Historic Interest. While this is not a statutory designation, chapter 6 (section 6.5.25) of Planning Policy Wales (PPW) states that information in the Register of Landscapes of Historic interest should be taken into account by local planning authorities in considering the implications of developments which are of such a scale that they would have a more than local impact on an area in the Register.

NRW's landscape review:

The site for the 2 proposed wind turbines lie at 4km to the boundary of Snowdonia National Park, 7km to the boundary of the Clwydian Range and

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

Dee Valley AONB, 4.8km from the Berwyn historic landscape of special historic interest and 4km from the Bala and Bala Lakeside landscape of special historic interest.

We concur with the submitted Landscape and Visual Impact Assessment (AMEC 2014) that “whilst visible from a number of locations ...the turbines would be present as a minor background feature, clearly located outside the designation’s boundaries and in a landscape of separate character”.

We however draw the local planning authority’s attention to the following issues which we feel the LVIA has underrepresented in regard to local landscape effects:

Cumulative Effects upon views from the Berwyns

The location of two separate wind developments at either end of the Mynydd Mynyllod ridge has the potential to create a degree of visual tension and unsettling effect on the view, with the eye drawn from one development to the other. The effect would be to attract attention to a greater degree than the proposed development on its own. LVIA photo viewpoint 16 illustrates the spatial arrangement of turbines within the landscape view. From locations lower down the hillside from viewpoint 16 and from the Wayfares track (a recognised walking and cycling route from the Ceiriog Valley) views are less panoramic and Mynydd Mynyllod defines the adjacent skyline. The spatial separation and relationship between the two developments is likely to be more discernible here and the cumulative effect likely to be significant.

The same cumulative effect would be experienced from views within the Berwyn historic landscape of special historic interest. Affects upon historic landscapes are considered differently to those upon visual receptors enjoying the landscape. In this case it is our view that the cumulative effect described above would not significantly affect the registered area’s historic character.

Effects upon views from the Bwlch at Bethel

The bwlch at Bethel forms a small pass and crossing it is a notable event within journeys to and from Bala. The A494 is an important regional transport route with frequent traffic. Within easterly journeys and on reaching Bethel the proposed turbines are likely to appear suddenly and as a major component of the view (LVIA viewpoint 2), with considerable impact due to the close viewing distance and scale of turbines on the skyline of this small bwlch. The turbine nearest the pass would be particularly dominant (as opposed to prominent assessed by the LVIA). Whilst the LVIA correctly assess the effect to be significant, we feel it underplays the effect both in magnitude and narrative describing the sense of impact that would be experienced here.

Sequential cumulative effects from the A494 and Glan yr Afon valley

The proposed wind turbines and operational turbines at Braich Ddu would be experienced within frequent sequential views from the A494, consolidating the presence of wind development characteristics within the Glan yr Afon valley. This would be a significant effect upon local landscapes and the perceptions of communities and visitors passing through the area.

In summary to the above landscape consideration, NRW do not object to the proposal, but draw the Local Planning Authority’s attention to local landscape issues which have been under-represented by the LVIA.

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

Transportation unit: **First response:**
No comments received.

Comments in response to the amended scheme:

I refer to the above application and firstly recommend the Welsh Government or it's agents NMWTRA be consulted as the proposals affect the local trunk road network and will lead to an increase of junction movements during the construction phase.

The reports indicate that up to 29 abnormal loads are expected onto site, in addition to general staff movements. The reports also state tracks equating to 14000 square metres will be constructed, which when bases on an average depth of 300mm, is approximately 4200 cubic metres of stone to be imported. This volume then equates to about 8,500 tonnes, or 425 lorry loads.

It is therefore recommended the applicant details which county roads will be used to carry the stone and agree to an extraordinary traffic agreement and joint condition surveys prior to commencing any work on site.

I would recommend a condition is also included requiring that the applicant is to implement all mitigating measures listed and detailed in chapter 13.6.1 of the Environmental Statement.

I would also recommend standard conditions / advisory notes relating to applying for Section 171/184 streetworks licenses to construct or widen the access, and to agree the traffic management measures prior to commencement:

Welsh Water: **First response:**
No objection & standard advice.

Comments in response to the amended scheme:

No objection & standard advice.

Environmental Heath & Public Protection: **First response:**

Conclusion to the comments: The applicant has satisfied us that the development will not create unacceptable impacts on adjacent residential dwellings in line with the current recognised advice that is available. It is recommended that any permission given should include conditions relating to noise and shadow flicker to ensure that residential amenity is protected.

Comments in response to the amended scheme:

It is noted that the height of the proposed turbines has been reduced. It is also noted that the location make and model is to remain the same. As a result the distance to assess shadow flicker is reduced and includes fewer properties in comparison with the original shadow flicker study.

As a result, I am content that the matters regarding noise and shadow flicker as they were on the original assessment are acceptable and that the original comments regarding the need for conditions still stands.

Biodiversity: **First response:**

A very comprehensive ecological report has been submitted with this application as part of the Environmental Impact Study. Birds and bats have

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

been surveyed in detail over two years and habitats have been surveyed as well and peat areas. European protected species were surveyed for but nothing was found other than bats. The site includes one candidate Wildlife site, (Hafoty Central and Mountain Mynyllod) see below.

Habitats.

Semi-improved grassland habitat is the majority of the surrounding habitat area with occasional acid grassland and a few wet and marshy areas. The development has been designed to avoid the wet parts here.

European Protected Species

The site has been surveyed for European protected species but none was found other than bats.

Birds

The surveys showed that birds such as Curlew are raised within 600m of the site and birds of prey such as kites and buzzards are using the area occasionally. It is not envisaged that there will be a negative impact on birds during construction or during the operational period of the turbines. A management plan should be developed to maintain and improve habitat and breeding habitats for birds - see below.

Bats

Surveys have shown that up to 6 bat species have been found using the site. They tend to use more sheltered areas away from the open setting of the new turbines. There are no roosts close to development and I agree with the outcome of the report that it is not anticipated there will be any negative impact on bats from the development here.

Peatland

The land has been surveyed for the presence of peat and the plans succeed to avoid any areas of peat.

Management Plan

The developer intends to implement a habitat management plan for the site once the turbines are operational. Brief details are included in the application regarding the content and objectives of the Plan (Lower Wind Farm Bodelith Habitat Management Strategy). The objectives are to continue and enhance the wetland habitats and increase diversity in the tall grasses by grazing management to increase the variety of insects. All this will improve conditions for breeding curlews and other species.

A monitoring plan should be included as part of the management plan that will report back on the impact of habitat management. This will also bring benefits to both wildlife site associated with the site. The strategy submitted is sufficient to be able to determine the application but a condition should be included to ensure that the management plan will be submitted to the authority for approval within six months of completing construction of turbines and associated works.

European Sites:

The development is within a few kilometres of three European protected sites:
Mignaint, Arennig, Dduallt (SAC)
Mignaint Arennig Dduallt (SPA)

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

Berwyn and south Clwyd Mountains (SAC)

The developer has written a document for conducting Habitat Regulations Assessment: Bodelith Isaf Wind Farm. Information for Habitat Regulations Assessment March 2014.

The document assesses the possible impact on the European sites here. As a Competent Authority to decide on the application I agree with the results of the assessment that there will be no negative impact on any adjacent European sites by virtue of the construction and operation of the development.

Comments in response to the amended scheme:

No further comments but confirmed that their previous comments should have included River Dee and Bala Lake (SAC) and the Berwyn (SPA) and that they still agree with the findings of the Habitat Regulations Assessment.

Tree Officer:

First response: Objection, more information required regarding the entrance & track to the site.

Comments in response to the amended scheme:

Previous comments still stand.

Gwynedd
Archaeological
Planning Service:

First response:

The historic environment chapter appears to be a considered (if sometimes contradictory) assessment of the resource and potential impacts, so far as is possible from desk-based sources and a walkover survey. It is surprising that no mention is made of the potential for peat, though the ecology chapter identifies that the scheme design avoids the most significant peat deposits. It is also not clear why no evaluation has been proposed, particularly given the length of new track and the identified archaeological potential. There is insufficient evidence to allow the prediction (8.8.1) that any buried remains encountered during works will be of low value and would experience only low impact. Geophysical survey might have been expected as well as trial excavation of one or more of the putative clearance cairns, in order to confirm whether they are indeed clearance cairns, rather than burials for example, which might merit preservation. Evaluation is incorrectly proposed by the assessment as mitigation. Should the development receive planning consent, a staged programme of mitigation involving survey, recording and excavation would be appropriate, but would no longer be able to include the option of mitigation by avoidance, should the cairns turn out to be significant, or were significant sub-surface archaeology to be identified.

I am unable to agree with a number of the assumptions on which assessment of setting impact has been based. Specifically, I disagree with the standpoint that the 25 year anticipated duration of the development is short compared with the antiquity of the sites under consideration and therefore any impacts are insignificant. The assumption that visible, accessible remains must exist for impact on setting to be meaningful is contrary to most published guidance on the subject, while the implication that a need for specialist knowledge or reconstruction to 'read' setting somehow diminishes its importance is peculiar and not widely held.

No illustrations are provided that are specifically intended to demonstrate the potential impact of the development on the settings of scheduled monuments

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

and listed buildings. However, inferences can be drawn from several photoviews, in conjunction with the text in the historic environment and landscape and visual chapters. The height and position of the turbines is such that there is potential for numerous sites to be affected to a greater or lesser degree and although it is felt that these are in general under-estimated within the assessment, they are discussed in detail and there is little point reiterating these conclusions at length.

There would appear to be five scheduled monuments where the proposed scheme would have a material effect on setting. From Cefn Ddwysarn Camp (ME063), the turbines would be apparent within the view towards Mynydd Mynyllod Enclosure (ME090). It is suggested in Table 8.7 that long distance views may have contributed to the siting of Cefn Ddwysarn Camp, but in the absence of supporting visual material and with limited understanding of the monument it is difficult to gauge how significant any new development within these views may be. On Cefn Caer Euni, it is noted (Tables 7.14 and 8.7) that the turbines will be 'prominent' from three monuments – a round cairn (ME227), a pair of ring cairns (ME040) and a hillfort (ME015). The prominence of the development is important, as it is not mere visibility which results in impact, but rather the extent to which it detracts from appreciation and understanding of the monument(s).

The effect here relates to change at a landscape scale, more than specific connections, although the visual link with Mynydd Mynyllod enclosure (ME090) is relevant. The monuments form part of a wider prehistoric landscape including earlier funerary and ritual monuments and later prehistoric settlement. The present landscape has evidently altered since the various periods at which these monuments were constructed and occupied, but it has retained a rural agricultural character that provides a harmonious setting and has not perceptibly fragmented or disrupted the prehistoric landscape, much of which occupies uncultivated uplands.

The submitted information suggests that the Bodelith Isaf turbines would be unlikely to impact catastrophically upon the settings of Cefn Ddwysarn and the Cefn Caer Euni monuments, or on the overall integrity of the landscape, but that they would be intrusive and in the case of Caer Euni, would materially add to the harm resulting from the existing scheme at Braich Ddu.

In each of these cases, the significance of the impact derives less from effects on views out from the monuments than on views *towards* Mynydd Mynyllod Enclosure (ME090). Mynydd Mynyllod Enclosure occupies a hilltop approximately 900m from the turbines and can be considered deliberately sited to take advantage of this position (for example, so as to be visible, to command extensive views, for defence or spiritual/cultural reasons). Figures 7.25, 7.27, 7.29, 7.33 and 7.39 all demonstrate that the proposed turbines will have a significant visual impact on the setting of the enclosure. The figures illustrate that, due to their height and proximity, the turbines will dominate views to and from the monument at close and mid range from several angles. Moreover, in conjunction with the existing Braich Ddu turbines, the development would physically and perceptually begin to enclose the monument with tall, modern structures, significantly undermining the appreciation of the monument as occupying a controlling position with far-reaching views across the landscape.

In light of these comments, it is considered that the proposed scheme would have an unacceptable impact on the setting of scheduled monument ME090,

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

Mynydd Mynyllod Enclosure. Welsh Office Circular 60/96 (paragraphs 10 and 17) and Planning Policy Wales (paragraphs 6.5.1 and 6.5.9) identify impact on the settings of nationally important sites as a material planning consideration. This impact cannot be satisfactorily mitigated and accordingly, it is recommended that planning permission is **refused**.

Comments in response to the amended scheme:

Having reviewed the submitted information, I am able to confirm that our comments on this scheme remain unchanged by the proposed reduction in height.

Whilst it is self-evident that a shorter turbine will be less conspicuous in comparison, it is stretching a point to claim, as the application does, that there will be an appreciable benefit: this would be a valid argument were existing turbines to be replaced, but cannot be applied to a baseline where there is no existing development at the site. Moreover, both the archaeological and cultural heritage assessment and the landscape and visual impact assessment indicate that the reduction in proposed height would not result in the impacts being considered less significant in EIA terms than the originally proposed turbines.

This is borne out by the revised photomontages and wireframes, which in some cases show no readily discernible difference between the previous and current proposals. Unfortunately the copies available online are poor quality, with the wireframes almost too faint to be legible. However, it is clear that despite the reduction in proposed height, the two turbines would constitute an incongruous and intrusive new element in the setting of the surrounding monuments, for the reasons outlined in our previous response (27th May 2014).

Accordingly, in accordance with *Planning Policy Wales* (July 2014) and Welsh Office Circular 60/96 *Planning and the Historic Environment: Archaeology*, we would reiterate our recommendation that planning permission for the proposed development is **refused**.

Snowdonia National Park:

First response:

Because of the size and location I believe that the turbines on their own, and in combination with other existing and proposed wind turbines in the vicinity, will impact adversely on the views into and out of the Snowdonia National Park. For example:-

Figure 7.56 where the turbine blades will be an intrusive, moving element in the landscape, breaking the horizon and impacting adversely on the setting of the historic town of Bala and the spire of Capel Tegid.

Figure 7.60 where the turbines are again an intrusive element in the landscape viewed by travellers along the A494, users of Llyn Teid and the lakeside cycle path,

Furthermore the turbines are seen against a background of Snowdonia's mountains from some locations, for example:-

Figure 7.52 where the turbines are prominent against the backdrop of the Aran Mountains.

Finally the Llandderfel area is recognised in the study of landscape sensitivity and capacity in Gwynedd and Snowdonia, undertaken by Gillespies, as being of medium-high sensitivity to wind energy developments.

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

As a result it is considered that the proposed development will impact adversely on National Park's setting and because of this the application should be recommended for refusal.

Comments in response to the amended scheme:

I note that the height of the turbines has been reduced to 92.5m to blade tip. However the Snowdonia National Park Authority considers that the turbines, because of their size and location, will impact adversely on the views into and out of the Snowdonia National Park. See details in my letter of 23 April 2014.

It is noted that the Llandderfel area (G12) is recognised in the study of landscape sensitivity and capacity in Gwynedd and Snowdonia, undertaken by Gillespies, as being of Medium-High sensitivity to wind energy developments. The study concludes that in this area *"There is typically no capacity for further wind energy development (with the exception of very infrequent domestic scale, development which should relate well to existing settlement/buildings)."*

As a result it is considered that the proposed development will impact adversely on National Park's setting and because of this the SNPA maintains its **objection** to the proposal.

Conwy County Council: **First response:**
None received.

Comments in response to the amended scheme:
None received.

Denbighshire County Council: **First response:**
The non-technical summary is misleading as it makes assumptions based on a scheme that does not have planning permission. There is therefore no justification in the assumption that the impact of the scheme would be negligible in light of Braich Du and Mynydd Mynyllod.

The non technical summary only reports the findings of the scheme based on the assumption that the Mynydd Mynyllod wind farm would go ahead; it does not reflect the current situation.

Concerned that further wind energy development in this area would give the appearance of an incremental spread of wind farm development extending in a broken line from the Clocaenog plateau all the way to the edge of the mountains of Snowdonia, which would result in an adverse cumulative landscape impact upon views from the Berwyn. This would be contrary to the guidance contained in TAN 8, which states that most areas outside SSA's should remain free of large wind power schemes.

Conwy & Denbighshire commission a Landscape Sensitivity and Capacity Assessment for wind energy development. It concludes that the strategy area near the application site has a medium-high sensitivity to wind energy developments and advises that given the presence of a large scale wind energy development nearby (Braich Ddu) there may only be capacity for further micro scale developments.

Comments in response to the amended scheme:

We would request that due account is taken of the potential cumulative

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

landscape and visual, and noise impacts of the development, given the increasing size and spread of on-farm turbines outside the Clocaenog Forest Strategic Search Area.

Powys County **First response:**
Council: No comments.

Comments in response to the amended scheme:
None received.

Scottish Power / **First response:**
Manweb: None received.

Comments in response to the amended scheme:
None received.

Ofcom: **First response:**
No objection

Comments in response to the amended scheme:
No objection

NATS Safeguarding: **First response:**
No objection

Comments in response to the amended scheme:
No objection

Arquiva: **First response:**
No objection

Comments in response to the amended scheme:
None received.

Joint Radio Company: **First response:**
No objection

Comments in response to the amended scheme:
No objection

Welsh Government, **First response:**
Trunk Roads: None received.

Ministry of Defence: **First response:**
No objection - In the interests of air safety the MOD requests that the proposed development is fitted with aviation warning lighting. The MOD requests that both turbines are fitted with 25 candela omni-directional flashing red lighting or infra-red lighting with an optimised flash pattern of 60 flashes per minute of 200ms to 500ms duration at the highest practical point.

Comments in response to the amended scheme:
No objection - In the interests of air safety the MOD requests that the proposed development is fitted with aviation warning lighting. The MOD requests that both turbines are fitted with 25 candela omni-directional flashing red lighting or infra-red lighting with an optimised flash pattern of 60 flashes per minute of

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

200ms to 500ms duration at the highest practical point.

Flood Management and Coastal Erosion Unit (Land drainage):

Risk
and
Risk
None received.

Comments in response to the amended scheme:

I refer to the above application and recommend to protect amenities of adjacent properties that any planning permission granted should include the following requirements:

Several watercourses flow through or are adjacent to the site. So as to protect the amenities of the proposed development and the neighbouring properties, I recommend that any planning permission which may be granted should include the following requirements as a condition:

- a) The developer shall safeguard the watercourses.
- b) In accordance with the requirements of Section 23(1) Land Drainage Act 1991 the developer shall submit details of his proposals to safeguard the watercourses to Gwynedd Council for Approval.

The cost of safeguarding the watercourses shall be borne by the developer.

If it is the intention of the applicant to culvert the watercourses that flow through or are adjacent to the site. So as to protect the amenities of the proposed development and the neighbouring properties, I recommend that any planning permission which may be granted should include the following requirements as a condition:

- a) The developer shall safeguard the watercourses.
- b) In accordance with the requirements of Section 263 Public Health Act 1936 and Section 23(1) Land Drainage Act 1991 the developer shall submit details of his proposals to culvert the watercourses to Gwynedd Council for Approval.

The cost of safeguarding the watercourses shall be borne by the developer.

BBC:

First response:
None received.

Comments in response to the amended scheme:

None received.

National Grid:

First response:
None received.

Comments in response to the amended scheme:

None received.

Crown Castle:

First response:
None received.

Comments in response to the amended scheme:

None received.

Clwydian Range and Dee Valley AONB:

First response:
None received.

Comments in response to the amended scheme:

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

The following observations are submitted on behalf of the Joint Committee in consultation with the Chair:

“Although approximately 6.5km outside the AONB, given the scale of this development it will be clearly visible in middle distance views from the higher ground of the AONB to the east and will consequently impact on the setting of the protected landscape and its special qualities of ‘tranquillity’, ‘remoteness, space and freedom’, particularly in respect of opportunities to experience ‘uninterrupted and extensive views from high places’. In particular, the intervisibility between the protected landscapes of the AONB and Snowdonia National Park will be adversely affected by the development. The committee considers that these impacts are underplayed in the Environmental Statement accompanying the application.

The committee is seriously concerned about the incremental spread of large scale turbine developments outside the TAN8 Clocaenog SSA, contributing to the appearance of a wind farm dominated landscape which is having a cumulative detrimental and harmful impact on the setting of the AONB. Taken in conjunction with existing and consented windfarms in the area, the current application would have the effect of visually extending this wind turbine dominated landscape further south when viewed from the higher ground of the AONB to the east and further undermine views of Snowdonia and the sense of remoteness enjoyed by these protected landscapes.

Notwithstanding the recent amendment to the application to reduce the height of the turbines, the Joint Committee still considers these impacts to be significant. The development will have a harmful impact on the setting and special qualities of the AONB and the Joint Committee therefore objects to the application.”

Welsh Government: **First response:**
None received.

Comments in response to the amended scheme:
None received.

Public Consultation: A notice was placed in the press, notices were placed in several locations close to the site and nearby residents were informed. The advertising period has expired and a significant number of letters / correspondence were received objecting on the following grounds:

- The development is on too large a scale for the local landscape and would cause an exceptional visual impact.
- The turbines would be a foreign, industrial, feature in the landscape.
- Cumulative effect – the local landscape would be dominated by turbines - there are proposals for at least 29 turbines in this area.
- The fact that there are three other turbines near the site does not justify damaging the area further.
- The applicant alleges that the turbines would fit into a group of turbines that are yet to receive permission.
- Damaging to the views from Snowdonia National Park, Berwyn SSSI, Clwydian Range ANOB and from many footpaths and public access areas.
- The landscape of this area is not of a lower standard than the National

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

Park's landscape.

- There is no plan for decommissioning the site.
 - It is important to remember the additional effects from road, hard standings etc
 - The moving blades attract much more attention than static structures
 - Concern about the general effects of connecting with the national grid – especially the need for pylons
 - No other development on this scale would be acceptable in rural Gwynedd
 - The photomontages in the Environmental statement are not a true reflection of the development
 - The visual assessment does not consider the effects of large turbines which are quite far away but still visible in the landscape
 - The Environmental Statement does not deal with matters concerning infrasound or amplitude modulation which are medically recognised dangers.
 - The ETSU R97 methodology is not a contemporary method of dealing with the effects of sound.
 - The sound assessment does not deal with the specific effects of the local landscape.
-
- There would be damaging effects on the health and amenities of local residents, especially because of noise and flickering shadows.
 - There are several houses near the turbine sites as well as the entire village of Bethel
 - The precautionary principle should be adopted when dealing with health matters.
 - The fact that the proposal raises health worries amongst local people is, of itself, a planning matter
 - There would be traffic dangers and the turbines would draw drivers' attention on the highway
 - One turbine is on a public footpath – it would constitute a danger to users
-
- Detrimental effect on the area's hydrology – the level of saturation would be changed which would damage wetland plants and private water sources.
 - The development would add to the problems of flooding
 - The works would damage areas of peat which are of ecological importance
 - Damaging effects on wildlife including birds such as kites and bats
 - The methodology for the bird survey which was presented is not consistent with the expectation of a scientific survey
 - Loss of mature beech hedge because of road widening
-
- The area is outside of the search area of TAN8 and contrary to the UDP policies
 - The development would be a precedent which would make it harder to refuse more turbines in the area
 - Any 'community benefits' offered should not be considered as planning considerations
 - Local people do not support the scheme

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

A document "Criticism and an Alternative Assessment Landscape and Visual Effects" was presented by an environmental consultant on behalf of some local residents. This concluded....

- The fact that the proposed scheme at Mynydd Mynyllod is nearby should not be used as justification for this scheme as that scheme has not had planning consent
- The Environmental Statement uses Enercon E70 E4 2.3MW turbine for modelling purposes but that turbine is significantly smaller than the turbine shown in the plans.
- A turbine of this size can generate 2.5MW and so the site could generate 5MW which, according to the guidance in TAN8, is not acceptable on rural sites outside of 'search areas'.
- These turbines would be bigger than any built on land in north Wales up to now and the blade swept area twice the size of any turbine already built.
- The blade swept area is an important feature in the visual impact of turbines.
- Considering the landscape, the height of the turbines of 465 and 485m to the blade tip is higher than the nearby Braich Ddu turbines (which is 440m)
- As the turbines are located on a relatively low ridge or land (compared to the surrounding mountains) their size is emphasised further.
- The turbines would be very visible in many views of the area's open land / paths and detrimental to the open views of mountains such as Aran Fawddwy, Arenig Fawr, Mynyddoedd y Berwyn a Chadair Idris.
- Damaging effect on the area's tourism
- Damaging effect on private tourism businesses
- The turbines at Braich Ddu already disfigure the area but their effect is limited. Permitting this nearby development would increase the visual effect substantially and emphasise the presence of foreign engineered structures in the landscape.
- The methodology for assessing the visual impact in the Environmental Statement is too limited – effects such as the sensitivity of the landscape should be considered and not only the sensitivity of the 'receptors'
- A wider assessment should be made from vantage points
- The 'Landmap' analysis is too wide to be of use and there are problems with Landmap analysis near the county boundary
- There would be visual impacts on the setting of important archaeological features

The Consultant presented his own visual assessment, assessing the development from the vantage points used by the applicant and adding new vantage points and using a finer scale of assessment than the one used in the Environmental Statement. This assessment shows that the visual effects would be more significant for all vantage points than shown in the Environmental Statement.

In addition to the above, several matters were raised which are not planning considerations.

- Not really an agricultural diversification scheme - the owner does not farm the site himself.
- This is an industrial business venture
- Lower house prices

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

- No jobs would be created
- This technology is not an effective way of producing energy
- Concern about the consultation process for the application

Response to the amended scheme:

- Detrimental visual impact on the landscape.
- Blight the landscape & views from Snowdonia National Park
- Harmful cumulative impact.
- Harmful shadow flicker effects
- Contrary to Gwynedd planning rules in terms of height.
- Not a small scale scheme
- Not a community or domestic based development
- Noise pollution will be significantly increased
- Visible from the Snowdonia National Park.
- Already several wind turbines in the area and would be tantamount to a windfarm outside the TAN 8 search areas.
- Not all close properties were included in the noise assessments, especially those down wind.
- Impact of the development on local roads and traffic.
- Noise assessments are flawed.
- Removal of the beech hedges along the B4402 would be harmful.
- Do not think there will be enhanced economic value from the development.
- Issues regarding peat has not been considered
- Comments in response to the original scheme still stand
- Site is sandwiched between protected areas
- Application site area should be part of the AONB.
- Application makes no reference on the impact to insects & pollinators.
- Turbines will be highly visible
- Already suffer with noise issues from Briach Ddu & these will be much closer. The combined effect is of great concern.
- Access is dangerous.
- Turbines may endanger birds & bats and other wildlife may be threatened during construction.
- Contrary to the SPG
- Too close to our dwelling, noise impact would be unacceptable.
- Harmful to the setting of archaeological remains. Ruin the experience of visitors.
- The scale of the turbines will dwarf the landscape.
- Negative impact on visual amenity.
- Development will add an additional blot to a once unspoilt landscape.
- Set a precedence for more turbines in the area.
- Result in reduced enjoyment of the area.
- Dominate the skyline and landscape.
- Noise impact will be heard from within my dwelling.
- The red flashing lights required by the Ministry of Defence will be an eyesore and another source of light pollution, in an area that has little light pollution..
- Insufficient time for the public to comment.
- Not a suitable site, too close to the Cors y Sarnau SSSI
- The transportation of the turbines will be harmful flora & fauna.

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

- Unacceptable detrimental effects on the form and character of the landscape with detrimental effects on prominent views into, out of and across centres of villages, rural villages and open countryside.
- Local road network is insufficient and dangerous.
- Application does not take into account the 2.6 miles of underground or over ground cabling to connect to the electricity network.
- Area is known as the gateway to Wales and is being ruined by a proliferation of wind turbines.
- No need for such schemes, Wales has already met its renewable quota.
- Can already hear the two recently erected turbines above Syrrior & do not want increased noise impacts.
- The proposal is contrary to UDP policies: SP1, SP2, B14, B23, B33, CH19, SP4, B22, C27, CH28, CH33, CH34.
- Proposal does not safeguard the views into and out of the National Park.
- The ancillary works are harmful to the landscape & contrary to SP1.
- Turbines would be insensitively and unsympathetically sited within the landscape contrary to policy B14.
- Overdevelopment.
- Who is responsible for the disposal of the turbines when they are no longer in use.
- Harmful impact on tourism.
- Turbine will be in direct line sight of the front of the property possibly causing intermittent glare or flashing.
- The turbines will completely dominate the upper Dee valley.
- Industrial development of this nature can never be subservient.
- Turbines are not essential or related to farming activities.
- Despite the slight reduction in height the turbines are still enormous.
- Danger to low flying air craft and microlite flyers.
- Safety issues for horse riders from the noise.
- Cumulative impact is starting to turn the landscape into an industrial park.
- Adverse impact from Llyn Tegid
- Concern regarding the cabling & connection to the grid.
- There has already been notable changes to the landscape in this area from turbines.
- Navigation lights as requested by the MOD would be visually intrusive in a area where there is very little light pollution.
- Objection maintained despite reduced scheme.
- Effect on health & wellbeing.
- Damaging to the heritage landscape & environment.
- The proposed access track will be a permanent scar on our landscape.
- Impact would contravene human rights.
- Negative cumulative landscape impact and a negative visual impact.
- Adverse effect on the character and appearance of Mynydd Mynyllod and Llandderfel.
- Flashing lights at our property day and night.
- Tan 8 was set in place as a protection from major exploitation.
- Once the landscape has been destroyed, it is irreplaceable.
- Modest reduction of effect, but insufficient to change the original assessment and objection given.
- In terms of magnitude the impact is not altered by virtue of the reduced scheme.

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

- The cumulative baseline has changed since the application was first submitted and the amended scheme does not consider this. The changes include:
 - The potential Mynydd Mynyllod scheme has been fully withdrawn.
 - Two turbines at Syrrior are now operational.
 - Application for a 48m single turbine at Tyfos has been submitted within Denbighshire.
 The new cumulative position should therefore be a material consideration.

In addition to the objections received above, several matters were raised that are not material planning matters:

- The tree turbines at Braich Du are quite often not working, what is the point of having others when those 3 should be used.
- Company has no local attachment
- Schemes do not benefit the community, they only benefit the landowner.
- De-valuation of property.

5. Assessment of the relevant planning considerations:

Principle of the development

- 5.1 National planning policy on renewable energy developments is set out in Planning Policy Wales, Edition 7 (PPW) and the associated Technical Advice Note 8: Planning for Renewable Energy (TAN 8). Further guidance is provided in the Practice Guidance: Planning Implications for Renewable and Low Carbon Energy, February 2011 (Practice Guidance).
- 5.2 National policy reflects the Welsh Government's central principle of sustainable development and the role that renewable energy and particularly wind energy can make to reducing climate change with an aim to achieve a 40% reduction in greenhouse gases by 2020.
- 5.3 The site is situated outside any Strategic Search Areas (SSAs) identified in TAN 8. In areas outside the SSAs there is a balance to be struck between the desirability of renewable energy and landscape protection. Paragraph 8.4 of Appendix D of TAN 8 refers to the implicit objective outside SSAs to maintain the landscape character (i.e. no significant change to landscape character from wind turbine development). It also states that to *maintain the integrity and quality of the landscape* within the National Parks/AONBs of Wales there should be no change in landscape character from wind turbine development.
- 5.4 In accordance with the objectives of Strategic Policy 9 of the UDP, the Local Planning Authority is supportive in principle of plans to generate renewable energy with wind turbines, subject to consideration of, and compliance with, all relevant planning issues. As noted above, a number of policies within the Gwynedd Unitary Development Plan are relevant when determining an individual application for a wind turbine.
- 5.5 Policy C1 of the Unitary Development Plan relates to locating new developments, and states that land within town and village development boundaries and the developed form of rural villages will be the main focus for new developments. New buildings, structures and ancillary facilities in the countryside will be refused with the exception of a development that is permitted by another policy of the Plan. Developments to generate renewable energy that use natural resources are specifically noted as developments that could be suitable if approved by another policy in the Plan; therefore, it is considered that the proposal complies with the requirements of the policy in

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

this way. Nevertheless, the policy proceeds to state that new buildings, structures and ancillary facilities in the countryside will be strictly controlled and that a good visual relationship between them and existing developments should be ensured wherever possible.

- 5.6 The main policy to consider in assessing the principle of this development, is policy C26 of the UDP. Policy C26 deals specifically with wind turbine developments and reflects National Planning Policy and Guidance. The policy states that ‘proposals for wind turbine developments within the Llŷn AONB will be refused. In other locations, only proposals for small-scale or community or domestic based wind turbine developments will be approved, provided that all of the noted criteria are met.’ The criteria states:
- 1) that the development would not have a significant detrimental impact on the setting of the Llŷn or Anglesey AONBs or the Snowdonia National Park;
 - 2) that any associated ancillary developments...are designed and, where possible, sited so as to alleviate their potential visual impact;
 - 3) that the development (either individually or combined with other wind turbine developments) will not have a significant detrimental impact on the landscape or nature conservation features;
 - 4) that there are no unacceptable potential environmental impacts or effects on amenity arising from the wind turbines including noise, light reflection and shadow flicker;
 - 5) that the development will not create significant electromagnetic interference to existing transmitting or receiving systems that cannot be adequately mitigated;
 - 6) that adequate provision has been included in the scheme regarding the decommissioning..., restoration and after-care of the land...;
 - 7) that the development will not cause significant harm to areas of archaeological importance, particularly within or near designated areas.
- 5.7 Policy C26 identifies community or small-scale wind turbine developments as developments with the capacity to generate less than 5MW. In terms of generating capacity the proposal does not wholly conform with this element of the policy as it specifically states less than 5MW. Despite the reduced scheme, it is clear that the maximum installed capacity is to remain at 5MW. Given that the proposal does not exceed 5MW, this in its self may not be sufficient reason alone to refuse the application. It does however demonstrate that a scheme of this size is at the threshold of what may be acceptable within the Development Plan policy and in an area which is outside any SSA’s. Paragraph 2.13 of TAN 8 also states that it is acceptable that planning permission for developments over 5MW outside SSA’s and urban/industrial brownfields sites may be refused.
- 5.8 It is considered that all the criteria in policy C26 are relevant and they are addressed below, along with other relevant planning policies in this report. In addition, the Supplementary Planning Guidance (SPG) “Onshore Wind Energy” has been adopted by Gwynedd Council in June 2014. The SPG emphasises, when dealing with wind turbine applications, a balance must be struck between the contribution of this technology towards national targets for renewable energy and any detrimental impact that the development could have on local environmental and social factors.
- 5.9 The SPG also refers to a study that was commissioned into a landscape sensitivity and capacity assessment for certain developments and undertaken by Gillespies. This states that within the Llandderfel character area there is typically no capacity for further wind energy development (with the exception of very infrequent domestic scale development which should relate well to existing settlement/buildings).
- 5.10 It is considered that the main issues in assessing this application are the impact of the proposed development in terms of:

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

Ancillary Developments and Decommissioning

- 5.11 Criterion 2 of Policy C26 relates to associated ancillary developments such as buildings, roads, etc., and states that they should be designed and installed in a way that mitigates their visual impact wherever possible. Criterion 6 of the policy relates to decommissioning, land reclamation and aftercare when the use would cease.
- 5.12 Objections were received stating that no details regarding decommissioning have been submitted as part of the application. Matters regarding decommissioning, land reclamation and aftercare can be managed when the use ceases by means of appropriate conditions, if the application is approved. This would ensure that the scheme is in accordance with criterion 6 of policy C26.
- 5.13 The ancillary developments to the turbines are listed in paragraph 1.2 of this report. The site compound is to be located to the west of Bodelith Farm and its associated farm buildings. This area is located unobtrusively within the landscape and would be partially screened by existing buildings. It is not considered that this element would be harmful to the surrounding landscape, visual or residential amenity.
- 5.14 For the duration of the construction works a security compound will be located adjacent to the access to the site off the B4402. There are substantial trees located to the west of the new access and forms part of the red line boundary of the application site. It is noted that cellular grass paving would be used in this area as a means of hard standing for the security compound. However, if permission was granted, conditions would have to be attached to ensure that the trees are retained and safeguarded for the duration of the works. Being adjacent to the public highway, this area is visually apparent and conditions would also have to be imposed to ensure that the area was cleared and restored once the turbines are operational. The Council's tree officer still has concerns regarding the impacts of the development on trees and hedges leading from the A494 to the entrance of the application site. Although the ES states only a few areas may be affected, which can be restored following completion of the construction period it is still considered insufficient to assess the actual impact of this part of the development. If the planning committee resolve to approve the application, the decision would have to delegate the powers to the planning manager to approve the application subject to the receipt of additional information and a satisfactory response from the Council's Tree Officer.
- 5.15 The site control building and substation compound is to be located to the north east of turbine 1. The control building would measure 13.7 x 9.3m and the ES confirms that the building will be faced with stone and roofed with slate. Matters relating to external materials and finishes can however be conditioned to ensure that the visual appearance would be acceptable in terms of policies C26, B22, B23, and B25.
- 5.16 It is considered that these ancillary elements could be acceptable and are reasonably justified (subject to appropriate conditions) in terms of policies B22, B23, B25 and criteria 2 of policy C26 if the siting of the two wind turbines is otherwise acceptable.

Biodiversity

- 5.17 The ES has assessed the potential environmental effects of the development by means of numerous surveys. The ES has specifically assessed non avian ecology, nature conservation and ornithology. Criteria points 3 and 4 of policy C26 is relevant to this aspect of the application. In addition policies B15, B16, B17, B20 and B20 are also relevant and the guidance contained within the SPG Wildlife Sites.
- 5.18 Numerous objections were received raising concern regarding the developments impact on flora, fauna, insects, pollinators, birds, bats and other wildlife and that the methodology used for the

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

surveys is not what would be expected for a scientific study. The comments also raised concern that the development would be harmful to peat.

- 5.19 In response to the consultation process the Council's Biodiversity unit posed no objection to the scheme providing that conditions would be imposed relating to the submission of a management plan to improve habitat and breeding habitats for birds. As suggested in the Outline Habitat Management Strategy and recommended by the Biodiversity unit a monitoring plan should be included in the management plan. The comments acknowledge that the developments avoid the wet and marshy areas and also areas with peat. Further to this NRW are satisfied with the findings of the peat survey carried out. Details of the management of surface water from the tracks should be submitted, this can however be conditioned if consent is given and would ensure that the proposal is in accordance with policy C26 and C29.
- 5.20 Natural Resources Wales initially objected to the application unless additional information could be submitted showing that the development would not have an adverse effect on the favourable conservation status of bats. Following the submission of additional information NRW had no further objection to the proposal providing that conditions are attached to any permission given requiring that a curtailment mitigation plan is submitted and implemented. With conditions it is not considered that the proposal would be contrary to policy B20.
- 5.21 The application site is located within a few kilometres of five European protected sites:
Mignaint, Arennig, Dduallt (SAC)
Mignaint Arennig Dduallt (SPA)
Berwyn and South Clwyd Mountains (SAC)
Berwyn (SPA)
River Dee and Bala Lake (SAC)
- 5.22 Policy B15 of the UDP gives protection to sites of international nature conservation importance and states that proposal that are likely to cause direct or indirect significant harm to the sites should be refused. The developer has written a document for conducting Habitat Regulations Assessment which assesses the possible impact on the European sites. The Biodiversity Unit (as the Competent Authority) confirmed that they agree with the findings of the Habitat Regulations Assessment which concludes that there will be no negative impact on any adjacent European sites by virtue of the construction and operation of the development. NRW also agreed with these findings. It is therefore not considered that the proposal is contrary to policy C26 or B15.
- 5.23 Policy B16 affords similar protection as B15 to Nationally Important Sites (SSSI's, NNR's). The ES concludes that the effects of the development would be negligible and not significant and no concerns were raised by NRW or the Council's Biodiversity Unit. Consequently, it is not considered that the development would be contrary to policy B16.
- 5.24 Despite the objections received to the application, the ES concludes that no significant effects are predicted in respect of the development. The responses from NRW and the Council's Biodiversity Unit conclude that the impacts of the development can be satisfactorily managed if the development is carried out in accordance with the recommendations of the ES and through the imposition of relevant planning conditions. It is therefore considered that the application satisfies the requirement of policies C26, C29, B15, B16, B17, B20 and the SPG Wildlife Sites.

General & Residential Amenities

- 5.25 Policy B23 states that proposals that would cause significant harm to the amenities of the local neighbourhood are refused. In addition, Policy B33 states that proposal that will cause significant harm to the quality of public health, safety or amenities, or to the quality of the built or natural environment will be refused unless adequate controls can be put in place by means of planning conditions or other mechanisms of control.

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

- 5.26 A large number of the objections received in response to the application raised concerns regarding noise, cumulative noise impacts with the turbines at Braich Ddu and shadow flicker impacts of the proposed turbines. The comments also question the methodology and appropriateness of using ETSU-R-97 as a means of assessing noise impacts.
- 5.27 The ES has undertaken a detailed study to assess whether shadow flicker is likely to occur at residential properties in the vicinity of the turbines. The study concludes that on a worst-case scenario there is the potential for some level of shadow flicker to occur at 13 properties. Given that the height of the turbines has been reduced Volume 1 of the Updated Planning Submission states the number of properties that could be affected has now been reduced to 10. Mitigation measures have still been recommended which would include a turbine shut down system to ensure that the turbines are not operational at the times when shadow flicker is likely to occur. The Council's Public Protection Unit concurred with the findings of the ES and that the impacts of the turbines could be managed via planning conditions to ensure that the impact on sensitive properties is acceptable.
- 5.28 The noise assessment was undertaken in accordance with ETSU-R-97 for the daytime period but also with a lower night-time noise limit as requested by the Council's Public Protection Unit. Despite the objection to the use of ETSU-R-97 as a means off assessing potential noise impacts, its use is acknowledged in TAN 8 and regards it as relevant guidance on good practice.
- 5.29 The noise assessment also took into account the cumulative noise impacts with the existing turbines at Braich Ddu and concluded that both wind farms could operate at the same time without creating a significant noise impact at the nearest receptors. The ES concluded that significant effects are not anticipated as a result of noise. In response to the consultation process the Council's Public Protection Unit stated that the method adopted and contents of the noise assessment is accepted and that there is no objection to the scheme providing that suitable conditions are attached to any consent given.
- 5.30 The ES has also studied the potential effect on residential and visual amenity impacts. The study acknowledges that there are 26 residential dwellings within 1.5km of the site. Numerous objections have been received to the application raising concerns regarding residential amenity. Concern was also raised regarding the impact at night and light pollution due to aviation warning lights requested by the MOD. The residential visual amenity assessment undertaken assessed each of the properties and what the likely impact would be. This was supported by wireframe diagrams. It was found that there would be significant effects on 14 of the properties assessed. Broadly, the LPA accepts the findings given the separation distances, orientation of the dwellings, landform and natural vegetation. It is considered that the turbines will appear as a dominant feature when viewed from the properties at Bethel but the separation distance is considered sufficient to ensure that the impact is not so detrimental that it would warrant refusal of the application on this basis.
- 5.31 Concern is however raised that the study did not include the properties known as Cistfaen and Cae Iago, properties that are located to the south of the site and are within 500m to 800m of the site. ES viewpoint 4 does however give some indication of the impact on Cistfaen as parts of the outbuildings are visible in fig.2.4b. Furthermore the cumulative impact with the turbines in combination with those recently erected at Syrion has not been assessed in terms of the impact on residential amenity, the ES states that other existing and consented turbines would be sufficiently distant from the Bodelith Site that their cumulative presence would have little influence upon landscape character or views. When travelling up the unclassified highway to Cistfaen the blades of the turbines at Syrion are visible from a number of locations. The LPA has significant concern with regard to the impact of the proposed turbines on Cistfaen, Cae Iago and Hafoty Wen and the potential to feel surrounded by turbines. The cumulative impact may also affect other dwellings to the southern aspect of the site. Without sufficient information to assess the potential impact, it is considered that the proposal is contrary to the requirements of policy B23 and C26.

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

- 5.32 Based on the evidence submitted as part of the application and the comments received from the Public Protection Unit, it is considered that the impacts of noise and shadow flicker can be satisfactorily managed if the development is carried out in accordance with the recommendations of the ES and through the imposition of relevant planning conditions. Despite the objections received, it is considered that this aspect of the application satisfies the requirements of policies C26, B23 and B33. Nevertheless due to the lack of sufficient information specifically relating to the properties known as Cistfaen and Cae Iago regarding the impact on residential amenity in terms of the visual effects, the application is considered contrary to policy C26 and B23.

Highways and Transportation

- 5.33 Policy CH33 is relevant to this aspect of the application which relates to safety on roads and streets. The application site is served off the B4402 which is just off the A494. The proposal entails the construction of a vehicular access to the west of Llys Garneddog and construction of access tracks on agricultural land. The construction period for the development is approximately nine months and the ES has assessed the likely number and types of vehicular movements into and out of the site. The maximum traffic impact associated with the construction is anticipated to occur in the six month of the construction programme. On two days in this month 64 two-way HGV trips are predicted to be generated on each of these days (32 vehicles into the site and 32 out), this is based on a worse case scenario.
- 5.34 Concern has been raised regarding highway safety and the junction from the B4402 to the A494. The ES does identify that lorry's leaving the site and turning right onto the A494 poses the greatest risk as it would conflict with vehicles travelling northeast on the A494. Mitigation measures have been recommended and a traffic management plan has also been submitted. In response the Transportation Unit had no objection to the proposal providing that the development was carried out in accordance with the mitigating measures outlined in the ES and with the imposition of conditions. The ES also recommends that a condition is imposed restricting construction activities and movements to and from the site to reasonable working hours in the interests of road safety and to reduce nuisance.
- 5.35 Despite the objections received it is considered that the impact of the proposal can be satisfactorily managed to ensure highway safety if the development is carried out in accordance with the ES and with planning conditions. It is therefore considered that this aspect of the application is in accordance with policy CH33.
- 5.36 The transportation unit recommended that the Authority consult with the Welsh Governments Trunk Roads Authority. To date no response has been received in response to the consultation, therefore if the planning committee resolve to approve the application, the decision would have to delegate the powers to the planning manager to approve the application subject to the receipt of a satisfactory response from the Welsh Government.

Historic Environment

- 5.37 To the south east of the site, approximately 5km away is the Berwyn Registered Historic Landscape, and to the south west lies the Bala and Bala Lakes registered Historic Landscape approximately 4 km away. As detailed in the ES and the response from CADW and GAPS there are a number of Scheduled Ancient Monuments in the vicinity of the site, the closest being the Mynydd Mynyllod Enclosure (ME090) which is approximately 650m from the application site to the north east. The ES identifies there are 5 within a 5km radius of the site. The ES has assessed there are 116 Listed Buildings within the 5km study area, most of which are located within Llandderfel and Llandrillo. The closest listed building is located at Bethel where the former chapel is a Grade II listed building. Policies B3, B7, B12, are therefore relevant to this aspect of the application. PPW also reflects the policies stating:

6.1.1 It is important that the historic environment – encompassing archaeology and ancient monuments, listed buildings, conservation areas and historic parks, gardens and landscapes – is protected. The Welsh Government's objectives in this field are to:

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

- *preserve or enhance the historic environment, recognising its contribution to economic vitality and culture, civic pride and the quality of life, and its importance as a resource for future generations; and specifically to*

- *protect archaeological remains, which are a finite and non-renewable resource, part of the historical and cultural identity of Wales, and valuable both for their own sake and for their role in education, leisure and the economy, particularly tourism;*

6.5.1 *The desirability of preserving an **ancient monument** and its **setting** is a material consideration in determining a planning application, whether that monument is scheduled or unscheduled. Where nationally important **archaeological remains**, whether scheduled or not, and their settings are likely to be affected by proposed development, there should be a presumption in favour of their physical preservation in situ.*

- 5.38 Policy B3 seeks to protect the setting of listed buildings. It states that proposals that cause significant harm to important views of and from listed buildings should be refused. The policy also states that the addition of intrusive elements is unacceptable. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act states that Local Planning Authorities shall have special regard to the desirability of preserving/safeguarding the setting of a listed building. As discussed above the ES has identified a larger number of listed buildings within the vicinity of the application site, the closest being the Chapel at Bethel. Apart from the chapel in Bethel, due to their location, orientation, presence of landscape features and reasons for listing it is not considered that the proposal would be detrimental to their setting.
- 5.39 The chapel at Bethel is located on a minor road just off the A494, set back slightly from the highway by a small forecourt with cast iron railings and gates. The chapel has been listed as a later C19 (though with earlier origins), ambitious in scale and enrichment for a rural context, employing an especially finely detailed and consistent renaissance style. The frontage of the chapel directly faces the application site. Despite the appearance of moving traffic on the A494 the views from the chapel which is slightly elevated above the A494 reflects a fairly unspoilt agricultural landscape. The Historic Landscape layer of Landmap recognises the location of the chapel as being within a landscape of high historical value that is of county value as a distinctive landscape of irregular fields, scattered settlement and woods that has seen little change in over a century.
- 5.40 Despite the findings in the ES, it is not considered that the permitted change of use of the chapel to another use results in it being less sensitive to changes to its setting. The permission given relates to very minor external alterations and the majority of the work is repair and maintenance and safeguarding of the listed building. The finished external appearance will remain as a chapel. Furthermore it is not considered that photomontage viewpoint 2 (figure 7.27-7.28) gives a true impression of the magnitude of effect on the setting of the Chapel. The assessment in table 8.8 states that the turbines will represent a high magnitude of change in the view (shown in viewpoint 2) but despite their close proximity lie at the margins of current views from the chapel. The assessment concludes that the magnitude of change would be low and the effect and significance would be slight / moderate and not significant.
- 5.41 The LPA does not fully agree with these findings. Planning permission for wind turbine developments would normally be granted for a period of 25 years, the effect would therefore be long lasting, although it is accepted the effects would easily be reversible. The response from NRW also identifies that the visual effects on the cluster of dwellings in the hamlet of Bethel have been underplayed. Despite the reduced scheme, Turbine no1 would be a prominent feature when seen from the listed chapel and would add to the man-made elements of the electricity pylons, the existing turbines at Braich Ddu and the A494 that detracts from the pleasant rural character of the landscape. Nevertheless the man made elements do not in themselves justify further introduction of modernised elements to the landscape. Furthermore the impact of the turbines would not be significantly mitigated by close proximity to existing buildings or other

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

large-scale structures and as a result it is considered that the proposed development would be harmful to the rural character and appearance of the area.

- 5.42 The rural character and appearance of the area forms an intrinsic part of the setting of the listed building. The fieldscape, scattered development pattern and the listed building provide evidence about past human activity in the area in this upland farming community, and in this respect are closely connected. The rural setting of the listed building is therefore a significant part of its evidential and historic value. It is considered that the proposed development would be harmful to the area's rural character. It would therefore be significantly harmful to the setting of the listed building and would detract from its overall historic character and sense of place. It would conflict in this respect with the statutory requirement to give special regard to the desirability of preserving the setting of listed buildings and with UDP Policy B3, which gives further effect to the statutory requirement in the development plan. In view of the special regard to be given to such matters, it is considered that the application should be refused as it is contrary to the requirements of Policy B3, Chapter 6 of PPW and Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act.
- 5.43 Policy B7 is clear in its advice stating that proposals that will damage or destroy archaeological remains of national importance (whether scheduled or not) or their setting will be refused. Point 7 of policy C26 also requires that the development will not cause significant harm to areas of archaeological importance, particularly within or near designated areas. Paragraph 6.5.1 of PPW reflects the balance that TAN 8 identifies between the need to provide renewable energies and landscape protection.
- 5.44 Gwynedd Archaeological Planning Service (GAPS) and CADW have both objected to the application despite the submission of an amended scheme that reduced the height of the turbines. Both responses are of the opinion that the development will have a significantly adverse impact on the setting of Mynydd Mynyllod Enclosure, Caer Euni Camp, Caer Euni Stone Circles and Cern Caer Euni Round Cairn, all of which are Scheduled Ancient Monuments (SAM's) and are therefore of national importance. Objections received from third parties also raised concerns regarding the setting of archaeological remains and that the turbines would ruin the experience of visitors.
- 5.45 The concerns relate to the impact on the Mynydd Mynyllod Enclosure that is located approximately 650m from the application site and the intervisibility with the SAM's on Cefn Cae'r Euni. Mynydd Mynyllod Enclosure is a prehistoric settlement site defended by a stone bank and natural outcrops, which is a rare example in the area. It occupies a hilltop and can be considered deliberately sited to take advantage of this position. Both GAPS and CADW are of the opinion that the proposed turbines will dominate its setting and views to and from the site. They both also raise concern that this proposal will increase the sense of enclosure already created by the turbines in Braich Ddu by introducing further visually prominent, vertical moving, man-made structures into a landscape notable for the range and extent of visible relict prehistoric monuments and would undermine the appreciation of the monument as occupying a controlling position.
- 5.46 In response to the first scheme Gwynedd Archaeological Planning Service (GAPS) also objected to the potential impacts on unknown remains that may be present where the proposed access tracks and hard standings would be constructed. If permission was granted a staged programme of mitigation involving survey, recording and excavation would be appropriate, but would no longer be able to include the option of mitigation by avoidance should significant sub-surface archaeology be identified. In response, the applicants agent submitted comments responding to those raised by both CADW and GAPS. The comments stated that any important remains could indeed be preserved in situ through development design or micro siting. In response to the amended scheme GAPS confirmed that their previous concerns still remained, and as such the impacts on unknown remains has not been sufficiently overcome. Given the constraints of the site (e.g. levels, visual impact of the access tracks, location of peat deposits), without further

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

information the acceptability of the development or proposed mitigation measures cannot be fully assessed.

- 5.47 It is considered that the proposal is contrary to the requirements of policy B7 as the impact of the turbines will have an unacceptable impact on the setting of Scheduled Ancient Monuments in the vicinity and it is also unclear if the development will have an unacceptable impact on unidentified archaeological deposits, their significance and whether or not suitable mitigation measures could be implemented. The application is therefore also contrary to point 7 of policy C26 and the requirements of PPW as the scheme does not preserve or enhance the historic environment.

Landscape

- 5.48 The application site does not lie within any designated landscapes. Nevertheless given the nature and prominence of the development it will be visible from protected landscapes. The site would be located within 4.5km of the Snowdonia National Park to the south and over 8km away to the west. The Clwydian Range and Dee Valley AONB is approximately 7km to the north east. To the south east of the site, approximately 5km away is the Berwyn Registered Historic Landscape, and to the south west lies the Bala and Bala Lakes registered Historic Landscape approximately 4.km away.
- 5.49 The ES includes various assessments and appraisals which includes information sourced from Landmap. In terms of visual and sensory aspects the Landmap assessment concludes that the area is of moderate value. The historic landscape has also been assessed as moderate in value; the area surrounding this is however evaluated as being of high historic landscape value. A more recent study into Landscape Sensitivity and Capacity has been carried out by Gillespies. The findings of this conclude that the overall sensitivity to wind turbine developments is medium high and that there is typically no capacity for further wind energy development, with the exception of very infrequent domestic scale, development which should relate well to existing settlements/buildings. The assessment acknowledges that the sensitivity to wind turbine developments is lower due to the medium scale, rolling and undulating landscape, which is in places influenced by modern developments that are mainly located to the south east of the study area. However it states the lower sensitivity is counterbalanced by the areas strong association with the Snowdonia National Park.
- 5.50 The applicants agent provided a technical note in response to the findings of the Gillespies report. They disagree with the overall conclusions regarding the areas capacity to accommodate wind turbine developments as the application site would not conform to a proportion of the criteria and that it can not be used as a substitute for a detailed site specific LIVA. It is accepted that the Gillespies assessment is not site specific and only limited weight can be attached to it in determination of the application. It does however demonstrate that this area is effectively a buffer between protected landscapes, such as the Snowdonia National Park and other areas where there is a greater presence of modern developments (including wind turbines) to the south east of the site. As a result careful consideration should be given to the acceptability of further large wind turbine development in this area.
- 5.51 Despite the objection to the application from the Snowdonia National Park and the Clwydian Range and Dee Valley AONB Joint Committee, NRW did not object to the proposal in terms of its wider impacts and accorded with the conclusions of the LIVA stating that ‘whilst the turbines would be visible from a number of locations... the turbines would present as a minor background feature, clearly located outside the designations boundaries and in a landscape of separate character’. From this point of view it is not considered that the application would have a detrimental impact on the setting of Snowdonia National Park, Clwydian Range and Dee Valley AONB or the registered historic landscapes and as such would not be contrary to policies B12, B14 or C26.

PWYLLGOR CYNLLUNIO	DYDDIAD: 19/10/2015
ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

- 5.52 NRW did however raise concern regarding the findings of the ES in terms of the local impact on the landscape at Bethel, the A494 and Glan yr Afon Valley which they consider to be under-represented in the LIVA. The proposed wind turbines and operational wind turbines at Baich Ddu would be experienced within frequent sequential views from the A494, consolidating the presence of wind turbine development within the Glan yr Afon Valley and would have a significant effect upon local landscapes and the perceptions of communities and visitors passing through the area. This is a concern raised by many of the objections to the scheme, referring to the area as ‘the gateway to Wales’.
- 5.53 Notwithstanding the conclusions regarding more distant views the turbine would appear as a tall and modern engineered structure that would be clearly visible from within the local landscape due to its scale and position on higher ground. Although the area has been subject to landscape change, Volume 1, Updated Planning Submission still acknowledges that there would be a high magnitude of change in Bethel as a consequence of the proposal. The modern appearance and moving blades of the turbines would be in stark contrast to the rural landscape surrounding it and due to its position at a relatively high point where it would be situated it would appear as a dominant and obtrusive feature and, with the exception of the existing turbines at Brach Ddu, would be out of scale with existing vegetation or other vertical elements in the landscape.
- 5.54 Those exposed to views would also be highly sensitive receptors being residents, recreational users of the rights of way or those using the local highway network and the presence of a moving, vertical structure of the scale proposed would be an alien feature that would have a significant impact on visual amenity.
- 5.55 As evidenced by the submitted information and from assessing the area, the proposed turbines would also be visible in combination with the existing turbines at Braich Ddu and Syrior from some viewpoints. It is considered that the relatively close proximity of the turbines to each other, their separation from any buildings or other substantial vertical elements in the landscape would result in them being prominent and defining features in the local landscape and which would fundamentally alter its character. The presence of the existing turbines does not justify or mitigate the impacts of this proposal. As a result, it is considered that this development reflects an incremental spread of wind turbine development in the area which is contrary to the guidance within TAN 8 which refers to the implicit objective outside SSAs to maintain the landscape character (i.e. no significant change to landscape character from wind turbine development).
- 5.56 To conclude, the proposal both individually and cumulatively with the existing turbines close to the site would be harmful to the landscape character and appearance of the local area and would have an adverse effect on visual amenity. The proposal would not be in accordance with policies B23 and C26 of the adopted UDP, the associated SPG and guidance contained within TAN 8.

6. Conclusions:

- 6.1 It should be acknowledged that the proposal would contribute to the UK target of 15% of energy to be derived from renewable sources by 2020 and the WG’s aim of having 4.5KWh/d/p of installed onshore wind capacity by 2015/2017. The planning system has an important role in delivering the above target, nonetheless, TAN 8 recognises that the implicit objective outside SSAs is to maintain the landscape character (i.e. no significant change to landscape character from wind turbine development).
- 6.2 A balance, therefore, needs to be struck between the benefits of generating electricity from renewable onshore wind and the identified impacts on the character and appearance of the landscape, the settings of scheduled ancient monuments and listed buildings, as well as the conflict with the statutory development plan and the potential impact on general amenities and enjoyment of the area.

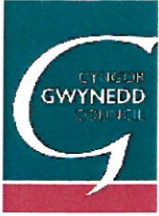
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ADRODDIAD UWCH REOLWR GWASANAETH CYNLLUNIO AC AMGYLCHEDD	DOLGELLAU

6.3 It is considered that the impacts identified conflict with policy and the potential impacts demonstrate that this part of the landscape is not environmentally suitable for further large wind turbine development. Furthermore, there is concern regarding the impact of the proposal on residential amenity based on the information submitted. Based on the above assessment it is considered that the balance lies on the side of preserving the historic environment and local landscape and that therefore the area should remain free from further incremental wind turbine development.

7. Recommendation:

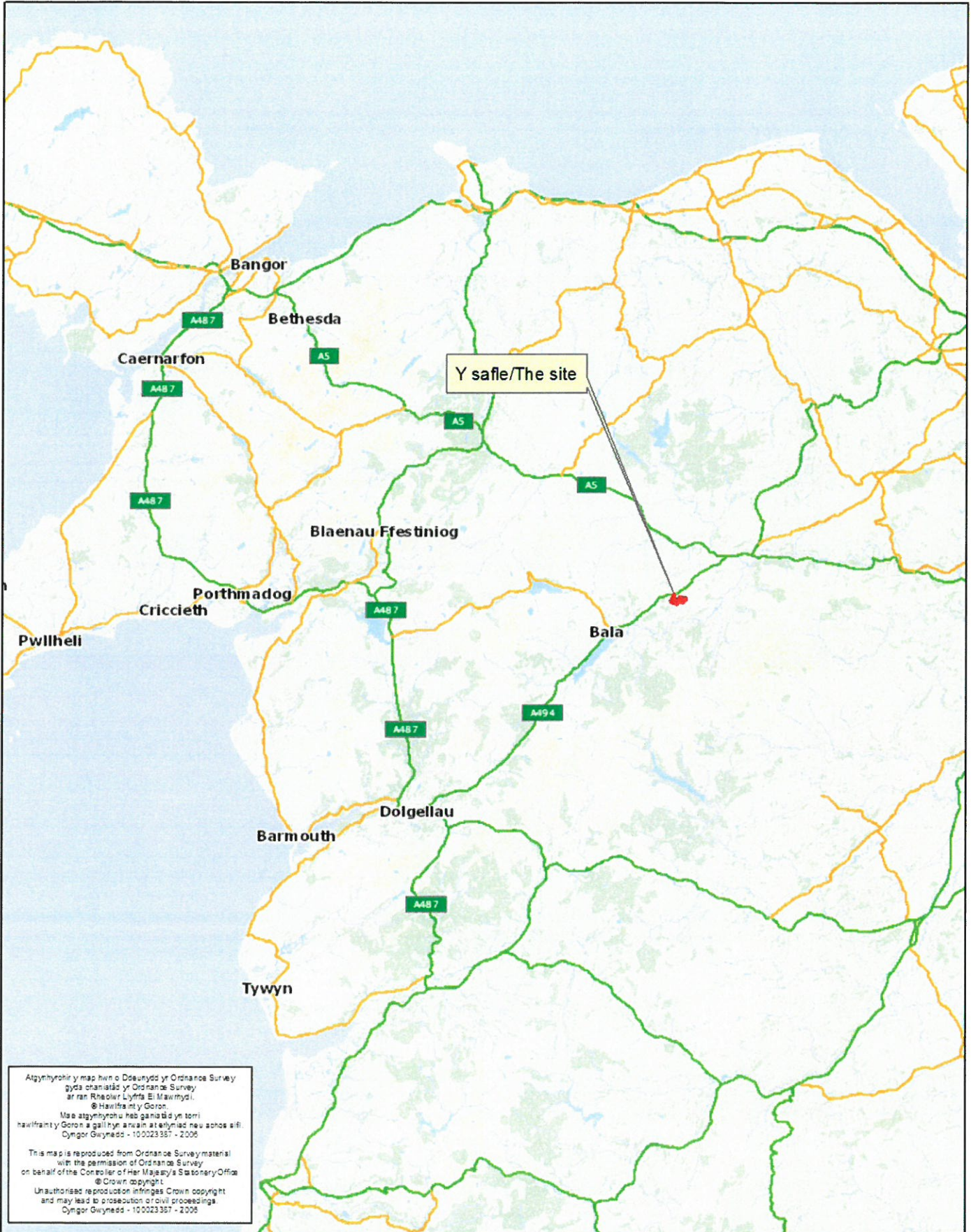
7.1 Refusal for the following reasons:

1. The proposal both individually and cumulatively with the existing turbines close to the site would be harmful to the landscape character and appearance of the local area due to the scale, siting and prominence of the proposed development and would have an adverse effect on visual amenity of nearby residents and those using the site and the surrounding area for recreation/amenity purposes. It is considered that the proposal is contrary to UDP policies B23 and C26, the SPG Onshore Wind Energy and guidance contained within TAN 8.
2. The proposal by virtue of its scale, siting and prominence would have a detrimental impact on the setting of the Grade II listed building known as Capel Bethel. The proposal is therefore considered contrary to policy C26, B3 of the Gwynedd UPD and Chapter 6 of Planning Policy Wales and Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act and Circular 61/96 Planning and the Historic Environment: Historic Buildings and Conservation Areas.
3. The proposal by virtue of its scale, siting and prominence would have a detrimental impact on the setting of the Scheduled Ancient Monuments known as Mynydd Mynyllod Enclosure, Caer Euni Camp, Caer Euni Stone Circles and Cern Caer Euni Round Cairn. It is also unclear if the proposal would have an adverse impact on unidentified archaeology and whether or not the impacts could be satisfactorily mitigated. The proposal is therefore considered contrary to policy C26 and B7 of the Gwynedd UPD, Chapter 6 of Planning Policy Wales and Circular 60/96 Planning and the Historic Environment: Archaeology.
4. Due to the lack of sufficient information regarding the impact on residential amenity in terms of the visual effects, specifically relating to the properties known as Cistfaen and Cae Iago, the application is considered contrary to policy C26 and B23 of the Gwynedd UPD.



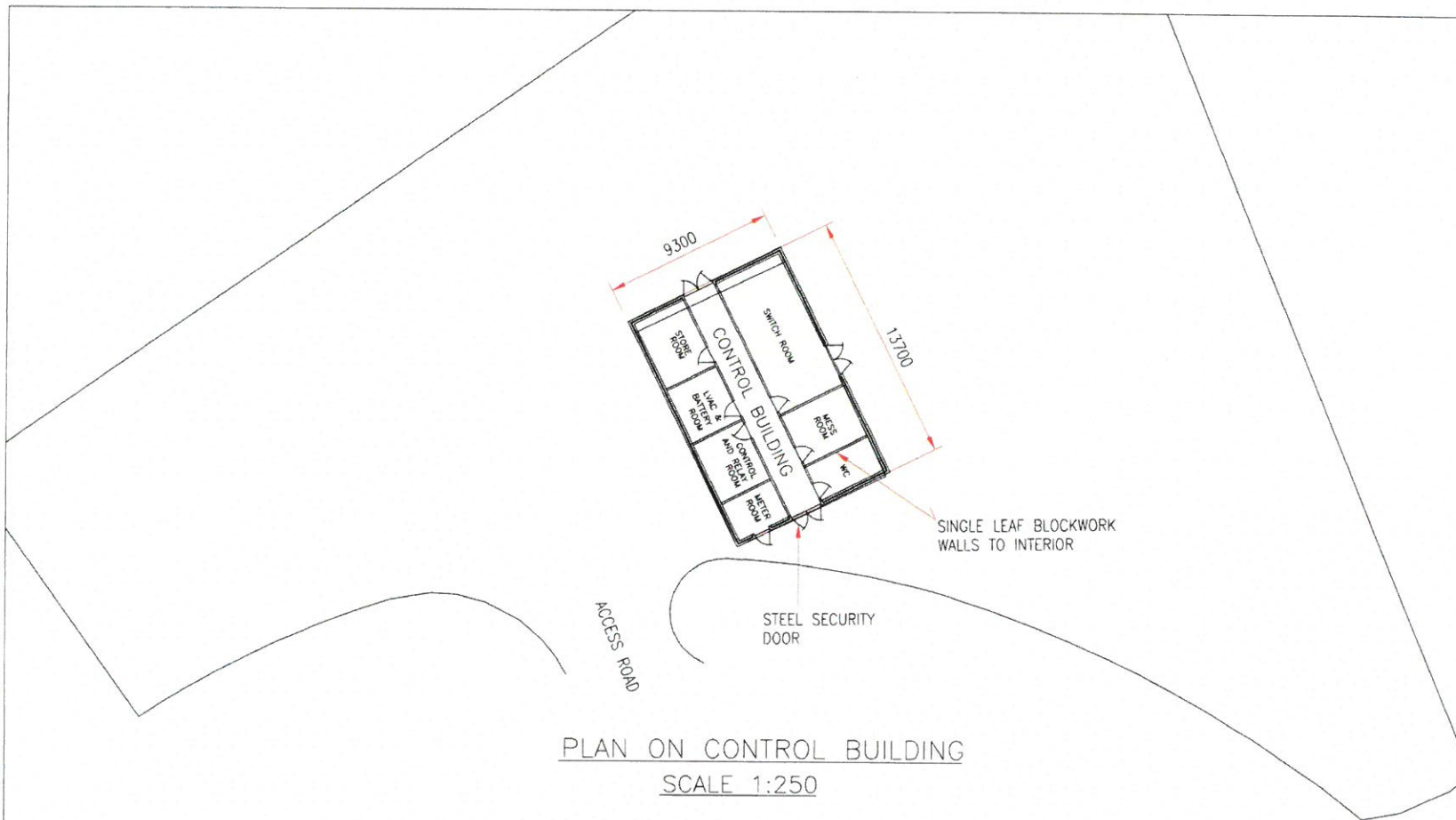
Rhif y Cais / Application Number : C14/0291/04/LL

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Location Plan for identification purposes only. Not to scale.

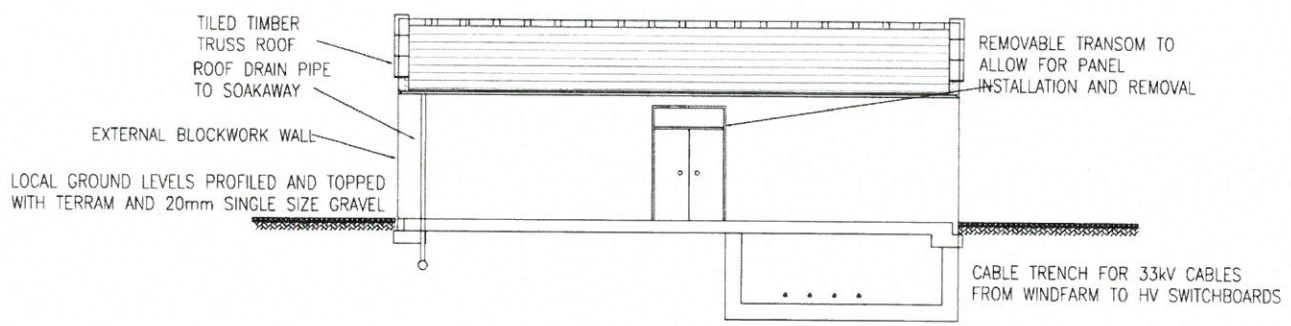


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PLAN ON CONTROL BUILDING
SCALE 1:250

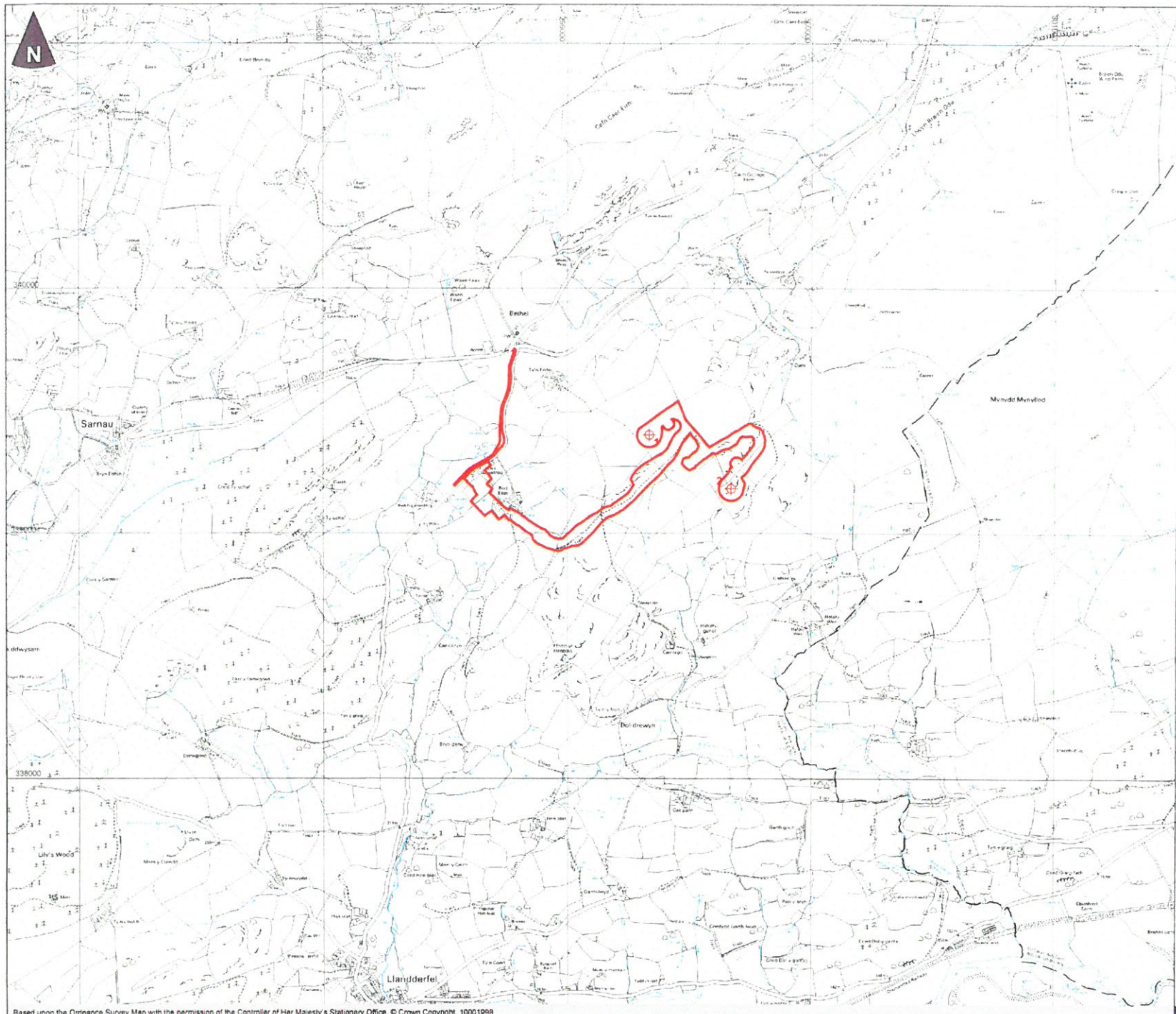


ELEVATION ON CONTROL BUILDING
SCALE 1:50



- Notes:**
1. All dimensions are in millimetres unless noted otherwise
 2. The control building and substation size is indicative pending further design work
 3. Septic tank and water supply to be provided by others

Pennant Walters (BI) Limited
Bodelith Isaf Wind Farm
Environmental Statement

Figure 5.8
Site Control Building & Substation Compound



Key

-  Site boundary
-  Proposed turbine location

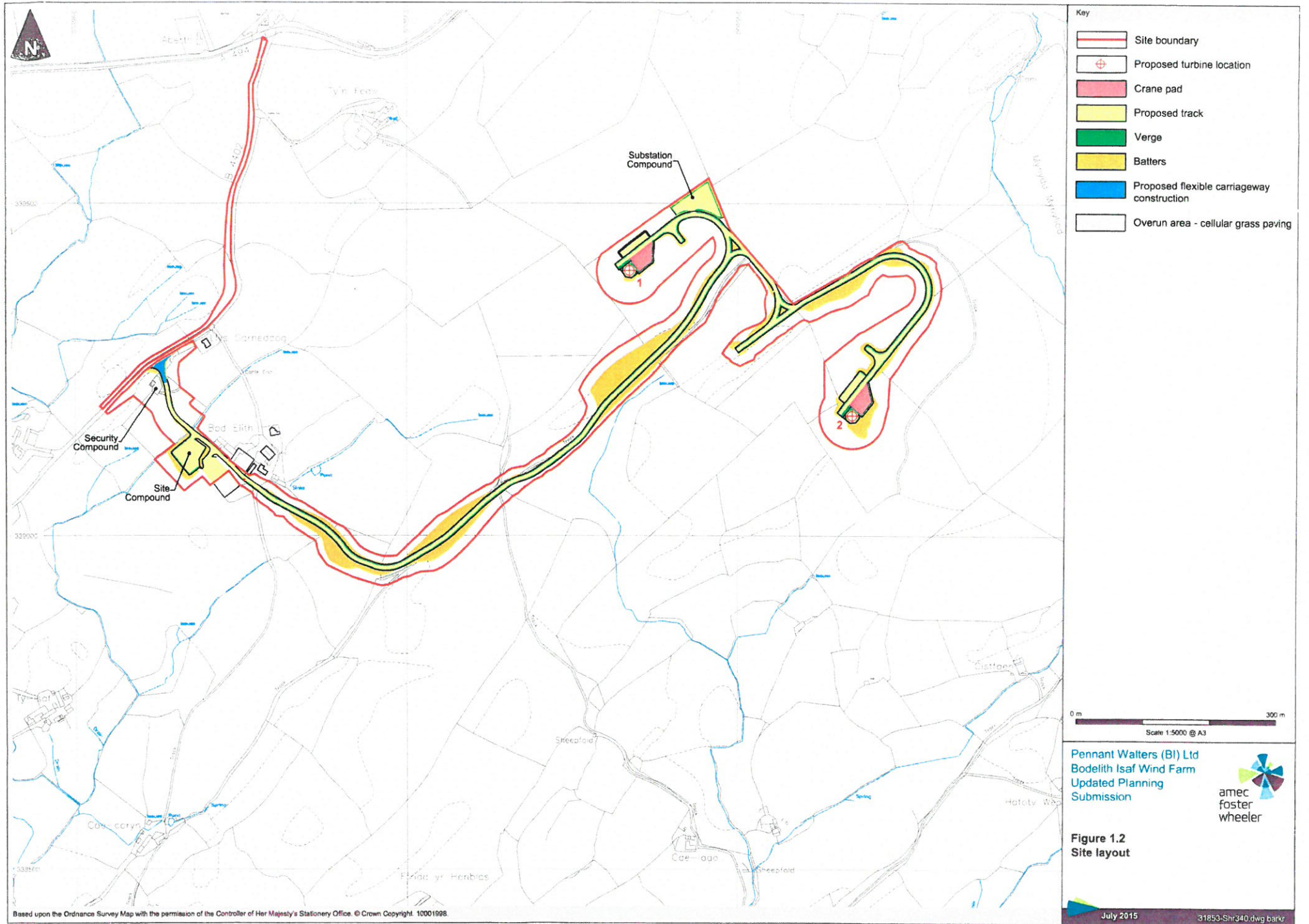


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Figure 1.1
 Site location

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- Key
- Site boundary
 - + Proposed turbine location
 - Crane pad
 - Proposed track
 - Verge
 - Batters
 - Proposed flexible carriageway construction
 - Overrun area - cellular grass paving

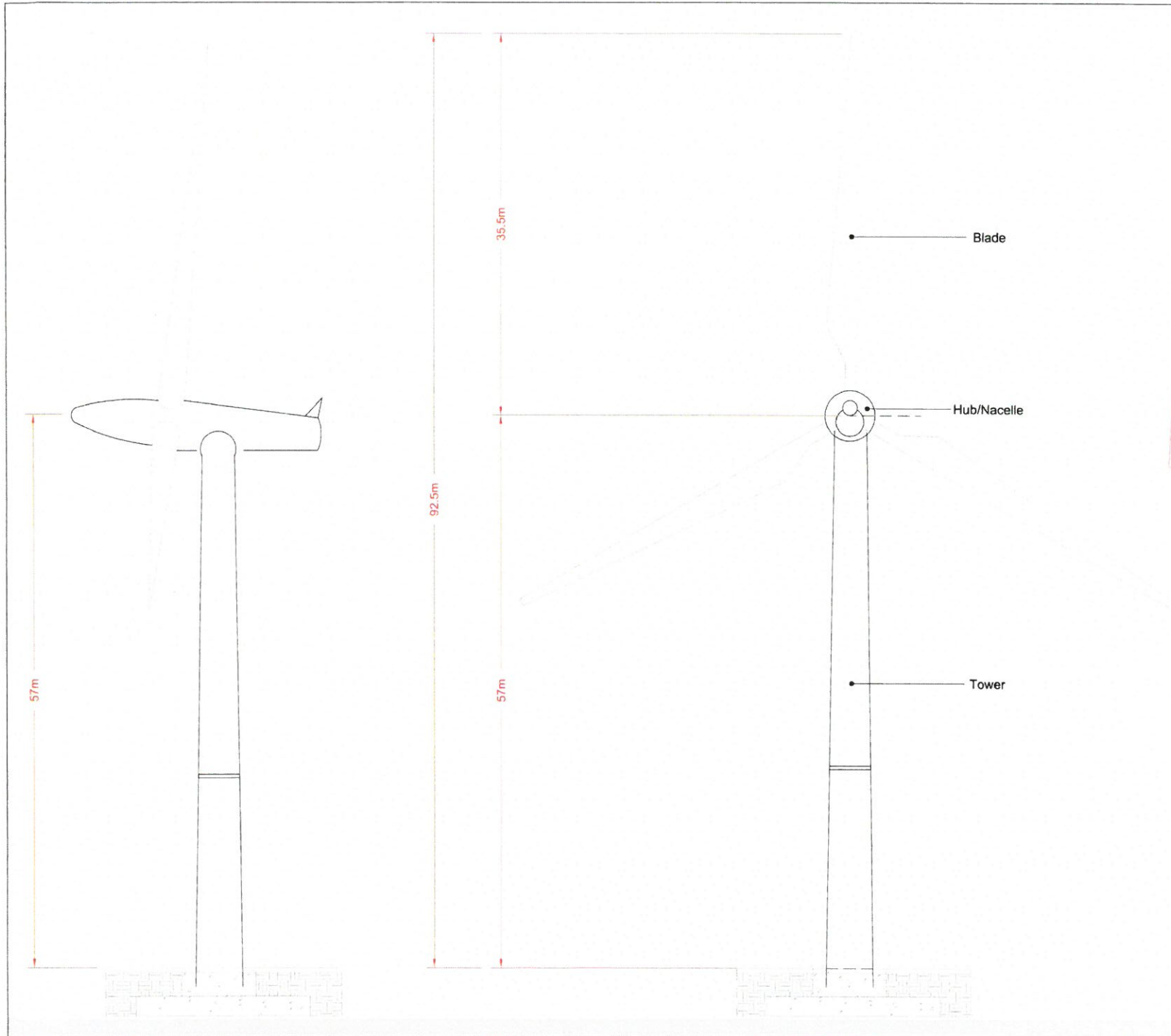
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Figure 1.2
 Site layout

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Notes
 1. This drawing is for illustrative purposes only

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 REVISED PLAN
 Dwyfodig Penawr: 23/7/15
 Llofnod signatura: KS

Not to Scale

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Figure 1.3
 Typical wind turbine