

**PLANNING STATEMENT**  
**GARN FACH WIND FARM**

**FEBRUARY 2022**

**Doc. Ref. 3.01**

**PEDW Ref.: DNS/3244499**

**GARN FACH WIND FARM AND ENERGY STORAGE FACILITY**

**EDF ENERGY RENEWABLES LTD**

**FEBRUARY 2022**

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## 1 INTRODUCTION

- 1.1 This Planning Statement (PS) has been prepared by Barton Willmore LLP ("Barton Willmore") on behalf of EDF Energy Renewables Ltd ("the Applicant") to accompany a planning application for a proposed onshore wind farm and energy storage facility at Garn Fach, David's Well, Llandrindod, Powys ("the Application Site"). A Site Location Plan accompanies this planning application and is appended at **Appendix A** for reference.
- 1.2 As the proposed development comprises an electricity generation station with an installed generating capacity of between 10 and 350 MW, it falls within the definition of a 'Development of National Significance' (DNS) under section 4(1) of the Developments of National Significance (Specified Criteria and Prescribed Secondary Consents) (Wales) Regulations 2016 (as amended), for the purposes of s62(D) of the Town and Country Planning Act 1990 (the "TCPA"), as amended by s19 of the Planning (Wales) Act 2015 ("the Planning Wales Act").
- 1.3 Section 62D (3) of the TCPA states that:
- "Development is of national significance for this purpose if it meets criteria specified regulations made by the Welsh Ministers for the purposes of this section".*
- 1.4 This application is therefore made to the Welsh Ministers, instead of to Powys County Council (PCC).
- 1.5 The planning application seeks planning permission for:
- "Proposed onshore wind farm and energy storage facility, together with associated equipment, infrastructure and ancillary works".*
- 1.6 This Statement provides a background to the proposed development, together with a description of the site and surroundings and provides an assessment of the proposed development against the relevant national and local planning policy and other material considerations. It comprises the following title sections:
- Introduction (Section 1) – introduces the Applicant, the basic principles of the proposed development and the structure of the Statement.
  - Project Description (Section 2) – describes the proposed development in more detail, explaining what is included within the planning application, and includes consideration of design and access.
  - Site and Context Analysis (Section 3) – describes the characteristics of the Application Site, as well as describing the immediate environs surrounding the site.
  - Planning History (Section 4) – identifies the most relevant planning history of the site.
  - Policy Framework (Section 5) – sets out the prevailing energy policy and planning policy context, including national and local policy and guidance that is applicable to the proposed development.
  - Assessment of the Proposed Development (Section 6) – assesses the proposed development against the prevailing Planning Policy Framework highlighted in section 5, concluding that the proposed development complies with the Development Plan and other material considerations.
  - Conclusions (Section 7) – concludes and summarises the preceding sections and makes the case for permission to be granted for this application.

- 1.7 The proposed development is considered to be EIA Development under the under the Town and County Planning (EIA) (Wales) Regulation 2017 (the 'EIA Regulations'). A formal request for a Scoping Direction under Regulation 31(1) of the Regulations was submitted to Planning and Environment Decisions Wales (PEDW)<sup>1</sup> on 10 January 2020 and the Direction was issued on 5 March 2020. Section 5 of this Planning Statement provides details of how issues raised in the Direction are addressed in the application.
  
- 1.8 This Statement is based on the suite of technical documents that accompany the planning application in relation to the proposed development, and which should be read in conjunction with this Statement.

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<sup>1</sup> on 1 October 2021 PEDW replaced the Planning Inspectorate in Wales, and for the purpose of this Planning Statement, the name of the new body (PEDW) is used to refer to any functions undertaken by PEDW or the Planning Inspectorate in relation to Garn Fach, even if those functions were undertaken prior to 1 October 2021.

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## 2 PROJECT DESCRIPTION

### Overview

- 2.1 The Applicant is seeking planning permission for an onshore wind farm, together with energy storage, and associated equipment, infrastructure and ancillary works. It is anticipated that the proposed development will have a generating capacity of circa 85MW.
- 2.2 The proposed development comprises the following:
- A total of 17 wind turbines, with three blades on a horizontal axis and a maximum tip height of 149.9m;
  - Turbine foundations;
  - Crane hard-standing areas at each turbine location;
  - Low to medium voltage external transformers at the base of each turbine;
  - Electricity storage facility with up to 50MW of energy storage capacity;
  - On-site tracks;
  - Buried electrical cables;
  - Sub-station compound containing a control building and outdoor equipment, including high voltage transformer and switchgear;
  - Borrow pits (for the extraction of stone on site); and
  - Temporary construction compounds.
- 2.3 The grid connection is not included as part of the proposed development and will be subject to a separate application for planning permission at the appropriate time.

### Layout

- 2.4 The layout of the proposed development is shown in **Appendix B**. The Application Site consists of three parcels of land. The northern parcel of land, nearest to the operational Llandinam Wind Farm, will contain 8 turbines, and the central parcel will contain 9 turbines. No turbines are proposed on the southern parcel of land, with its purpose being a suitable area for enhancement measures for ecological receptors: Golden plover, curfew, and Great Crested Newt.

### Scale and Appearance

- 2.5 A description of each component of the proposed development is as follows:

#### *Landscaping*

- 2.6 The existing landscaping remains unaltered and no additional soft landscaping is proposed, other than re-profiling around construction works including access tracks, turbine foundations, crane hardstandings, substation and borrow pits.

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*Access*

- 2.7 The main access will be directly from the existing junction of the A483 and the minor road to the P&L Wind Farm. Where possible, the access route has followed existing tracks within the site. A southern track from David's Well on to the site will be included in the application as an Operation & Maintenance (O&M) access. A cycle route through the site will be included as part of the application, and a small car parking area is proposed alongside the southerly track.

*Electrical Cabling and Substation*

- 2.8 The turbines will be connected to the proposed substation by 33kV on-site cabling. These cables will be laid underground in trenches, running adjacent to the Site tracks. The trenches will be backfilled with excavated material and have the original vegetation reinstated.
- 2.9 The substation compound would comprise switchgear and transformers for the purposes of increasing the electricity voltage to 132kV prior to export to the grid owned by the Distribution Network Operator (DNO). The area required for the substation is 150m x 80m and will also accommodate a control building and basic welfare facilities. Typically the control building will be approximately 54m x 15m x 6.6m and finished in an appropriate vernacular design.

*Energy Storage Facility*

- 2.10 The proposed energy storage facility would comprise a series of batteries stored within prefabricated units. The batteries will potentially have dual purposes: firstly, working alongside the grid operator to provide storage capacity for frequency response and voltage control, thereby strengthening the electricity service provisions to the region; secondly, to enable storage of electricity from the wind energy scheme at times when the grid is unavailable or when production exceeds the capacity of the grid to export and distribute the power.
- 2.11 The energy storage units are within a compound adjoining the substation and would be installed on concrete plinths. Typically each battery unit would be housed within a 12m long container with a capacity of circa 2MW.

*Construction*

- 2.12 Two temporary construction compounds (each around 7,200m<sup>2</sup> in area) are required to accommodate the following:
- Temporary portable buildings for use as site offices/welfare facilities;
  - The storage of fuels, tools, small parts and materials required during construction;
  - Parking for cars and construction vehicle; and
  - A receiving area for incoming vehicles and refuelling.
- 2.13 Turbine foundations will be formed in excavations up to 3m deep, depending upon localised ground conditions and the depth to suitable load-bearing ground. They will be steel reinforced circular concrete foundations up to 22m diameter. Prior to excavation, topsoil (and in particular peat, where this is present) and existing vegetation will be lifted and carefully stored. After completion of the foundation works, they will be backfilled with excavated

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material and vegetation will be reinstated.

- 2.14 Crane hardstandings are required to provide a stable bearing surface for the mobile cranes required for turbine erection. Two cranes are typically used and the hardstanding specifications vary between turbine manufacturers; however they will typically require an area of approximately 62.2m by 25m and are formed by excavating and infilling with compacted stone.
- 2.15 Existing tracks within the proposed landownership boundary will be utilised wherever reasonably practicable for construction and on-going turbine access and servicing after commissioning. New and upgraded tracks will provide the required access between the Site entrance, turbines and the other infrastructure. A total of approximately 10.22 km of new on-site access track will be constructed to provide full transport access to all of the turbine locations. Upgrading of approximately 3.63 km of existing farm tracks and 584 m of existing forestry track will also be undertaken to a similar standard as that of the new tracks. They will typically have a running width of 5m with widening at corners and will have turning heads and passing places where required. Track verges will be reinstated after construction.

### **Secondary Consents**

- 2.16 The access track for the proposed development will cross an area of Common Land. An application under section 16 of the Commons Act 2006 to de-register and replace the 3000m<sup>2</sup> construction footprint by the proposed development will be submitted as a secondary consent alongside the main DNS application.

### **Design Evolution through Pre-application Dialogue**

- 2.17 The Applicant has engaged positively and regularly throughout the pre-application period with all relevant stakeholders, which has led to the design of the proposed development changing over time.
- 2.18 A request for pre – application advice under Regulations 6 and 8 of the Developments of National Significance (Wales) 2016 ('DNS Regulations') was submitted on 8 July 2020, with further advice sought on 24 February 2021 following a telephone conversation with an officer at PEDW.
- 2.19 The full response provided by PEDW is included in **Appendix C**, but their overall assessment of the proposed development can be summarised as follows:
- No obvious policy objection to the principle of development within national or local planning policy;
  - Key issues to be addressed with more detailed site-specific information are Landscape and Visual Impact (incorporating living conditions of nearby occupiers), Ecology, Ornithology, Historic Environment, Noise, Traffic and Transport and Cumulative Impact;
  - The key issues would need to be satisfactorily addressed through appropriate consultation, survey work, mitigation measures (if and where appropriate) and the imposition of appropriate planning conditions; and
  - Potential benefit from the scheme in terms of its ability to provide significant amounts of renewable energy, contribute towards greenhouse gas reduction targets and provide balancing capability to the National Grid through the use of energy



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storage.

- 2.20 PEDW's overall assessment concluded that provided the Applicant is able to show through evidence that there would be no unacceptable harm, it is considered that the scheme as proposed could be recommended for a grant of planning permission.
- 2.21 In addition, regular meetings have been held with PCC as the local planning authority. Pre-application advice was issued by PCC on 4 November 2020, included in **Appendix D**. In relation to the principle of development, PCC considered that the principle of development is compliant with both national and LDP policies. Key issues highlighted by PCC to be addressed within the application were landscape and visual impact, residential amenity, cultural heritage, highways/transport, public rights of way and open access land, and the natural environment (biodiversity). PCC concluded that the benefit of renewable energy production should be given considerable weight in the determination of any submission.
- 2.22 The advice provided by PCC and PEDW, alongside the outcomes of the community consultations, have resulted in the following changes to the proposed development:
- Reduction in the number of turbines from 22 to 17, and relocation of two turbines:
    - T7 relocated to increase distance from properties, and
    - T8 relocated following detailed peat surveys,
  - Crane hardstanding and blade laydown area at T1 realigned to minimise the works on common land,
  - Track between T16 and T15 realigned to follow a section of existing track,
  - Borrow pit to the south of T11 reduced in size to avoid areas of archaeological interest, and
  - Borrow pit to the north of T15 relocated to the east of the turbine, to move the borrow pit off the ridge line and further from archaeological features.
- 2.23 Further detail on pre – application dialogue and methods of engagement are included in the Pre-application Consultation Report (Doc Ref 5.01).

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### 3 SITE AND CONTEXT ANALYSIS

- 3.1 The Site is located approximately 2km west of Llaithddu, 5km north-west of the village of Llanbadarn Fynydd and 8km to the south of Newtown in the County of Powys, Wales. The operational Penrhyddlan and Llidiartywaun (P&L) wind farm is located on the north-west boundary of the Site. The application site is within the administrative boundary of Powys County Council (PCC) and is approximately 10km west of the border with the county of Shropshire, England.
- 3.2 A Site Location Plan is included within **Appendix A**. A full description of the Site is included within the ES and its Appendices (Doc Refs 4.01 – 4.03).
- 3.3 The Site occupies three separate parcels of land and is circa 713ha in area overall. The northern parcel of land is located to the south and east of the operational Llandinam Wind Farm, situated on the Waun Ddubarthog ridge which runs north – south at a height of approximately 520m above ordnance datum (AOD). The land is characterised by open upland moorland. To the west, the land rises up onto land occupied by the Llandinam turbines and to the east, the land falls into the valley of the Blue Lins Brook. Numerous small streams cross the northern parcel draining into the Blue Lins Brook. Garn Fach forestry area is located to the south of the northern parcel.
- 3.4 The central parcel is located to the south of Garn Fach. It includes parts of the Brondre Fawr ridge, at a height of approximately 500m, and several valleys including the Custogion Brook and Cwm Craf. The land comprises of a combination of open upland moorland and enclosed improved grazing, defined by small blocks of forestry and coniferous shelterbelts. Footpaths and bridleways cross the site. There are residential properties in close proximity to the proposed central parcel boundaries. In addition, there is a scheduled monument in the western part of the parcel comprising a stone circle and round cairns, known as Fowler’s Arm Chair (Reference Number: RD039 according to Cadw).
- 3.5 The southern parcel consists of a small area of open upland moorland at the southern end of the Brondre Fawr ridge, separated from the middle parcel by forestry. The ridge rises to approximately 470m AOD, and is dissected by the narrow valley of the Cwm Nant – y – stabl, which flows east to west, draining into the valley of the Afon Marteg to the west of the southern parcel. There are several properties approximately 100m to the west of the parcel.
- 3.6 The proposed development does not fall within any nationally or locally designated landscapes. Shropshire Hills Area of Outstanding Natural Beauty (AONB) is approximately 10km to the east of the Site. According to the Natural Resources Wales Development Advice Map1, the vast majority of the site is located in Flood Zone A, which is considered to be at little or no risk of fluvial or coastal / tidal flooding. Very limited areas of the site fall within Flood Zones B and C2, which is assumed to be in relation to localised, and limited, fluvial flood risk.
- 3.7 Based on the Coal Authority’s online map, the site does not lie in a Coal Mining Reporting Area.
- 3.8 The main access for the Site will be directly from the existing junction of the A483 and the minor road to the operational P&L Wind Farm, to the north of the Site.

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## 4 PLANNING HISTORY

- 4.1 The wider area around the Site has been subject to a number of applications for renewable energy schemes. As stated in Section 2 above, the operational P&L wind farm is adjacent to the north-west boundary of the Site. On the site, the most recent planning application is the approved 90m meteorological mast (application no. 20/0348/FUL) and its discharge of conditions (20/0981/DIS) in relation to the proposed Garn Fach development.

### **Llaithddu Wind Farm**

- 4.2 The Site was subject to a planning application (BERR/2008/0002) in May 2008 for 29 turbines, known as the Llaithddu Wind Farm, with an installed generating capacity of 66.7MW. In 2013, the applicant updated the scheme, and the application was ultimately considered as a 27 turbine scheme with 62MW of installed generation capacity. The 27 turbines were located in two distinct groups – a northern group of 12 turbines and a southern group of 15 turbines. The Llaithddu Wind Farm was considered at a conjoined Public Inquiry between June 2013 and May 2014 (together with four other wind farms and a 132kv grid connection). The Inspector report made recommendations to the Secretary of State for Energy and Climate Change on 8<sup>th</sup> December 2014.
- 4.3 The Inspector's report on the conjoined Public Inquiry concluded that there was agreement from the Inspector and Council that the northern part of the Llaithddu Wind Farm would be well designed and located, and that it would be acceptable in landscape and visual impact terms. Turbines 1 to 8 of the proposed Garn Fach development are located within this northern part.
- 4.4 In relation to the southern group of turbines, the Inspector's report concluded that the turbines would cause a high degree of harmful landscape change within the upper Marteg Valley as a consequence of the linear layout and design of the turbines, and the decision to place the proposed turbines on the highest ground on a ridge. The extent of the southern group stretched for 3.7km along the ridge with the nearest turbines 1.8km from Bwlch-y-Sarnau and Glyndwr's Way within the upper Marteg Valley close to Bwlch y Sarnau. Turbines 9 to 17 of the proposed Garn Fach development are within the southern group but now extends for 1.1km against the previous 3.7km, therefore reducing the extent of turbines along the Brondre-fawr ridgeline and with fewer turbines on the ridge top. The nearest turbines are now located approximately 4km from Bwlch-y-Sarnau, in addition, the turbines form a more balanced layout in the views from this area.
- 4.5 The Inspector concluded that the Llaithddu Wind Farm would be acceptable in all other respects, but recommended refusal on the basis the landscape and visual impacts of the proposed southern group of turbines would cause significant harm and conflict with national, Welsh and local planning policy. The Secretary of State subsequently refused the application in September 2015.
- 4.6 A comparison of the Llaithddu turbine layout, and the current layout of turbines is presented in **Appendix E** through a series of wireframes illustrating the appearance of the proposed layouts from selected viewpoints. The wireframe comparison shows that the landscape and visual impact of the proposed development is reduced when compared to Llaithddu Wind Farm, as the proposed Garn Fach development does not extend as far south as the Llaithddu Wind Farm. In particular, views of the proposed Garn Fach development from Bwlch-y-Sarnau (Viewpoint 2) will not have turbines within close proximity as was the case with the Llaithddu Wind Farm. Views of the proposed Garn Fach development from David's Well (Viewpoint 3) are also substantially reduced extending now only to 70 degrees field of view, rather than 120 degrees field of view as was the case with the Llaithddu Wind Farm.

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## 5 POLICY FRAMEWORK

- 5.1 This chapter sets out the policy context for the proposed development – a context which includes energy and climate change policy, and planning policy at a national and local level.

### **NATIONAL POLICY ON CLIMATE CHANGE, SUSTAINABILITY, AND RENEWABLE ENERGY**

- 5.2 Since the Kyoto Protocol came into effect in 2005, it is widely accepted that greenhouse gas emissions need to be significantly reduced and that there is a need for international action. The United Kingdom, together with 37 other industrialised countries (called “Annex I Countries”), committed themselves to reducing greenhouse gas emissions by 5.2% from 1990 levels by the year 2012. The current policy stance on climate change has all stemmed from the context set by the Kyoto Protocol, and the intervening legislation which followed it up to the latest position which is discussed below.
- 5.3 The Committee on Climate Change (CCC) published a report in May 2019, titled ‘*Net Zero – The UK’s contribution to stopping global warming*’. The report responded to a request from the Government to reassess the UK’s long-term emissions targets and recommended a new emissions target for Wales: a 95% reduction in greenhouse gases by 2050, from a 1990 baseline. The target had previously been an 80% reduction, as set out in The Environment (Wales) Act 2016.
- 5.4 Chapter 6 of CCC’s report refers to delivering a net zero emissions target for the UK. The chapter sets out a number of actions, including the transition to a net zero emissions economy and what is needed to underpin delivery of net zero emissions in the UK. ‘Part b’ sets out key near term actions to put the UK on track to achieve net – zero greenhouse gases emissions by 2050 and recommends that more rapid electrification must be accompanied with greater build rates of low carbon generation capacity, accompanied by measures to enhance the flexibility of the electricity system to accommodate high proportions of inflexible generation. In addition, the report explains that the development of new infrastructure will be important in opening new avenues for decarbonisation.
- 5.5 In June 2019, the UK government also declared a climate emergency following the publication of the CCC report. The resultant legislation amended the Climate Change Act 2008 (c.27) and introduced a legally binding target to achieve ‘net zero’ by 2050. Paragraph 1 of the Climate Change Act (as amended) sets out the target to 2050 and states that:
- “it is the duty of the Secretary of State to ensure that the net UK carbon account for the year 2050 is at least 100% lower than the 1990 baseline (which means the aggregate amount of net UK emissions of carbon dioxide for that year and net UK emissions of each of the other targeted greenhouse gases for the year that is the base year for that gas)”.*
- 5.6 On 20 April 2021, the UK Government announced its commitment to reduce carbon emissions by 78% by 2035 compared to 1990 levels (including, for the first time, those from shipping and aviation). The new target will become enshrined in law by the end of June 2021.

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### **Welsh Government Climate Emergency**

- 5.7 In April 2019, the Welsh Government declared a climate emergency and in June 2019 accepted the CCC's recommendation for a new emissions target, but set a more ambitious target of net zero emissions no later than 2050.
- 5.8 In March 2021, new legislation came into force in Wales, amending the 2050 emissions target<sup>2</sup> and the interim emissions targets<sup>3</sup>. As well as amending the 2050 emissions target to net zero, the 2030 target was increased from 45% to 63% below the 1990 baseline, and the 2040 target was increased from 67% to 89% below the 1990 baseline.
- 5.9 Evidence for the third UK Climate Risk Independent Assessment (CCRA3) in relation to Wales<sup>4</sup>, highlights that the climate in Wales is already changing, with an increase of 0.9°C in the average annual temperature since the mid-1970s, an increase of 2.0% in annual mean rainfall and 6.1% in sunshine hours during the same period, approximately 1.4mm of sea level rise per year since 1901, and an increase in extreme heat events.
- 5.10 Powys County Council declared a climate emergency in September 2020 and set out their ambition to reduce the Council's own carbon emissions to net zero by 2030, in line with the Welsh public sector target.

### **Prosperity for All: A Low Carbon Wales (March 2019)**

- 5.11 The Environment (Wales) Act 2016 requires Welsh Government to reduce emissions of greenhouse gases (GHGs) in Wales by at least 80% for the year 2050. Under s39 of that Act, Welsh Ministers must prepare and publish a report for each budgetary period setting out their policies and proposals for meeting the carbon budget for that period.
- 5.12 *Prosperity for All: A Low Carbon Wales* is the Welsh Government's first statutory decarbonisation plan. It sets out the Welsh government's approach to cut emissions and increase efficiency in a way that maximises wider benefits for Wales, ensuring a fairer and healthier society. It sets out a hundred policies and proposals that directly reduce emissions and support the growth of the low carbon economy.
- 5.13 It specifically seeks to reduce the use of fossil fuels for power generation, and promote and accelerate the deployment of renewable energy generation. The plan also recognises that energy storage and flexibility services will need to be provided to integrate with new renewable energy development as part of a whole system approach. In relation to the power sector, the plan sets a target to reduce power sector emissions by 37% from baseline levels [1990s] by the year 2030. The Welsh Government's Sector Emission Pathway for Power<sup>5</sup>, published in June 2019, states that power sector emissions would be 2% greater than the baseline level in the year 2020.
- 5.14 Policy 26 (Implementing Energy Consenting, Planning & Permitting policy) identifies planning as a key lever in Wales for determining the sources of fuel for power generation. The NDF is identified as a key aspect of this as it will play:

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<sup>2</sup> The Environment (Wales) Act 2016 (Amendment of 2050 Emissions Target) Regulations 2021

<sup>3</sup> The Climate Change (Interim Emissions Targets) (Wales) (Amendment) Regulations 2021

<sup>4</sup> [www.ukclimaterisk.org/wp-content/uploads/2021/06/CCRA-Evidence-Report-Wales-Summary-Final.pdf](http://www.ukclimaterisk.org/wp-content/uploads/2021/06/CCRA-Evidence-Report-Wales-Summary-Final.pdf)

<sup>5</sup> [gov.wales/sites/default/files/publications/2019-06/power-sector-emission-pathway-factsheet.pdf](http://gov.wales/sites/default/files/publications/2019-06/power-sector-emission-pathway-factsheet.pdf)

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*a key role in facilitating clean growth and decarbonisation, and helps build resilience to the impacts of climate change. Achieving our strategic decarbonisation goals is highlighted as a key driver, which all development plans must support.*

- 5.15 Policy 31 (Delivery of our Renewable Energy Targets) specifically seeks to deliver the 2017 Renewable Energy Targets announced by the Welsh Government, including generating 70% of Wales' electricity consumption from renewables by 2030.
- 5.16 The Welsh Government is set to publish its second statutory decarbonisation plan (LCDP2) in Autumn 2021. This will set out the policies and approach it intends to take to meet Wales' second Carbon Budget (2021-25). The LCDP2 will set out the Welsh Government's policies and actions for the longer term.
- 5.17 Delivery of renewable energy development at all scales is evident as a key objective throughout Welsh Government plans and strategies on including *Prosperity for All: the national strategy* (2017), *Prosperity for All: A Climate Conscious Wales* (November 2019), and *Prosperity for All: economic action plan* (2017).

#### **National Infrastructure Strategy – Fairer, Faster and Greener (November 2020)**

- 5.18 The Strategy sets out the UK Government's plans to deliver on its ambition, being *'deliver an infrastructure revolution: a radical improvement in the quality of the UK's infrastructure to help level up the country, strengthen the Union, and put the UK on the path to net zero emissions by 2050'*. It states that: *'to achieve net zero by 2050, the power system will need to be virtually carbon free and significantly larger to cope with the additional demand from electrification in transport, heating and some industrial processes. It states this expanded system requires increased investments in network infrastructure, sources of flexibility, such as interconnection, demand response and storage, together with enough low carbon generation capacity to provide the vast majority of the UK's electricity needs'*.
- 5.19 It states that net zero requires a dramatic increase in the share of generation from renewables, including specifically from onshore wind and solar. The Government also proposes to continue supporting the roll out of renewables through the Contracts for Difference subsidy mechanisms, which now includes solar and wind technologies.

#### **Energy White Paper (December 2020)**

- 5.20 The White Paper *'Powering our Net Zero Future'* builds on the Prime Minister's Ten Point Plan for a green industrial revolution and provides a long-term strategic vision for the UK's energy system, consistent with delivering net zero emissions by 2050. It puts forward a strategy for the energy system that:
- *"Transforms energy, building a cleaner, greener future for our country, our people and our planet.*
  - *Supports a green recovery, growing our economy, supporting thousands of green jobs across the country in new green industries and leveraging new green export opportunities.*
  - *Creates a fair deal for consumers, protecting the fuel poor, providing opportunities to save money on bills, giving us warmer, more comfortable*

*homes and balancing investment against bill impacts”.*

5.21 The White Paper states the Government’s goal of a decisive shift from fossil fuel to clean energy, in power, buildings and industry, whilst creating jobs, growing the economy and keeping energy bills affordable. It also explains that a four-fold increase in clean electricity generation could be required by 2050, due to the retiring of old capacity and the potential doubling of demand from increased electrification (e.g. vehicles and heating).

5.22 It does not target a particular mix of energy generation technologies to meet the 2050 target, stating that the market should determine the best solutions for very low emissions and reliable supply at a low cost to consumers. It states however that a low-cost, net zero consistent system is likely to be composed predominantly of wind and solar. It further states:

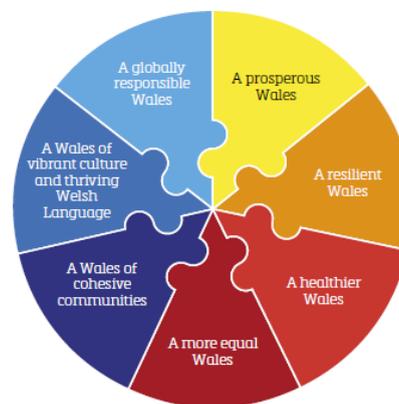
*“Onshore wind and solar will be key building blocks of the future generation mix, along with offshore wind. We will need sustained growth in the capacity of these sectors in the next decade to ensure that we are on a pathway that allows us to meet net zero emissions in all demand scenarios”.*

5.23 The role of other technologies such as battery storage is also recognised in the White Paper, to support reliability in power supply and balance the grid.

### **The Well-being of Future Generations (Wales) Act 2015**

5.24 The Act is relevant to all public bodies in Wales and the WG has duties to secure sustainable development by improving the economic, social, environmental and cultural well-being of Wales to achieve the 7 “*well-being goals*”. All planning applications in Wales need to demonstrate how they align with the well-being goals.

The Well-being of Future Generation’s Goals



5.25 One of the well-being goals set in the Act is for a globally responsible Wales. Statutory guidance on the Act (Shared Purpose: Shared Future 1: Core Guidance) explains that action on climate change benefits both people and communities in Wales, whilst also contributing to the wider global effort to tackle the causes of climate change and reduce its effects.

5.26 Key matters highlighted in the guidance for bodies to focus attention are decarbonisation (including use of clean energy) and sustainable consumption and production.

### **PLANNING POLICY FRAMEWORK**

5.27 In accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004, this application should be determined in accordance with the Development Plan, unless material considerations indicate otherwise. Under Section 38(4) of the Act the Development Plan in Wales comprises the following:

- The National Development Framework for Wales;
- The Strategic Development Plan (SDP) for any strategic planning area that includes

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all or part of that area; and

- The Local Development Plan (LDP) for that area.

5.28 The following section provides an overview of the planning policy relevant to the proposed development and reflects the DNS Pre-Application Advice provide by PEDW in August 2020 (see **Appendix C**). It should be noted that, at the time the application was submitted, no SDP had been prepared for the PCC area.

### **Relevant National Planning Policy**

*Future Wales: the National Plan 2040 (February 2021)*

5.29 Future Wales is the Welsh Government's National Development Framework and is the highest tier of the Development Plan in Wales. It states that *"as set out in legislation, applications for Developments of National Significance must be determined in accordance with Future Wales"*.

5.30 As the most recent expression of national planning policy, Future Wales is considered to have primacy in the planning policy hierarchy. Its purpose is to ensure the planning system at all levels is consistent with, and supports the delivery of, Welsh Government strategic aims and policies (including those in Planning Policy Wales, the Wales Infrastructure Investment Plan and Regional Economic Frameworks). It was prepared with regard to various Welsh Government policy and legislation, including:

- Well-being of Future Generations (Wales) Act 2015;
- Environment (Wales) Act 2016;
- Prosperity for All: A Low Carbon Wales (March 2019); and
- Policy Statement: Local ownership of energy generation in Wales – benefitting Wales today and for future generations (February 2020).

5.31 Future Wales provides the spatial direction for development in Wales and the policy framework for SDPs and LDPs at the regional and local level. These plans are required to conform to Future Wales and planning decisions at every level must be taken in accordance with the Development Plan.

5.32 Section 2 of Future Wales sets out how it has been informed by climate change issues, including projections showing an increased chance of milder, wetter winters and hotter, drier summers, rising sea levels and an increase in the frequency and severity of extreme weather events. It further states:

*"It is vital that we reduce our emissions to protect our own well-being and to demonstrate our global responsibility. Future Wales together with Planning Policy Wales will ensure the planning system focuses on delivering a decarbonised and resilient Wales through the places we create, the energy we generate, the natural resources and materials we use and how we live and travel"*.

5.33 Section 3 includes the Future Wales' Outcomes which are described as *"collectively a statement of where we want to be in 20 years' time. Every part of Future Wales...is concerned with achieving the Outcomes"*. The Outcome of principal relevance to the proposed developments is:

*"A Wales where people live in places which are decarbonised and climate*



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*resilient: The challenges of the climate emergency demand urgent action on carbon emissions and the planning system must help Wales lead the way in promoting and delivering a competitive, sustainable decarbonised society”.*

- 5.34 Policy 17 notes that the Welsh Government strongly supports the principle of renewable and low carbon energy development from all technologies and at all scales to meet our future energy needs. Furthermore it states (our emphasis):

*"In determining planning applications for renewable and low carbon energy development, **decision-makers must give significant weight to the need to meet Wales’ international commitments and our target to generate 70% of consumed electricity by renewable means by 2030** in order to combat the climate emergency. In Pre-Assessed Areas for Wind Energy the Welsh Government has already modelled the likely impact on the landscape and has found them to be capable of accommodating development in an acceptable way. **There is a presumption in favour of large-scale wind energy development** (including repowering) in these areas, subject to the criteria in policy 18. Applications for large-scale wind and solar will not be permitted in National Parks and Areas of Outstanding Natural Beauty and all proposals should demonstrate that they will not have an unacceptable adverse impact on the environment. Proposals should describe the net benefits the scheme will bring in terms of social, economic, environmental and cultural improvements to local communities. New strategic grid infrastructure for the transmission and distribution of energy should be designed to minimise visual impact on nearby communities”.*

- 5.35 The majority of site (including turbines 10 to 17) is located within Pre-Assessed Area for Wind Energy (PAA) 4 as designated in Future Wales (see **Appendix F**). Whilst Turbines 1 – 8 are located outside PAA 4 it should be noted that these turbines are located in an area considered acceptable for wind development in landscape and visual impact terms by the Inspector for the previous Llaithddu planning inquiry.

- 5.36 Policy 18 provides the criteria for assessing large scale proposals for renewable and low carbon energy and is required to be read together with Policy 17. It states:

*"Proposals for renewable and low carbon energy projects (including repowering) qualifying as Developments of National Significance will be permitted subject to policy 17 and the following criteria:*

- 1. Outside of the Pre-Assessed Areas for wind developments and everywhere for all other technologies, the proposal does not have an unacceptable adverse impact on the surrounding landscape (particularly on the setting of National Parks and Areas of Outstanding Natural Beauty);*
- 2. There are no unacceptable adverse visual impacts on nearby communities and individual dwellings;*
- 3. There are no adverse effects on the integrity of Internationally designated sites (including National Site Network sites and Ramsar sites) and the features for which they have been designated (unless there are no alternative solutions, Imperative Reasons of Overriding Public*

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*Interest (IROPI) and appropriate compensatory measures have been secured);*

4. *There are no unacceptable adverse impacts on national statutory designated sites for nature conservation (and the features for which they have been designated), protected habitats and species;*
5. *The proposal includes biodiversity enhancement measures to provide a net benefit for biodiversity;*
6. *There are no unacceptable adverse impacts on statutorily protected built heritage assets;*
7. *There are no unacceptable adverse impacts by way of shadow flicker, noise, reflected light, air quality or electromagnetic disturbance;*
8. *There are no unacceptable impacts on the operations of defence facilities and operations (including aviation and radar) or the Mid Wales Low Flying Tactical Training Area (TTA-7T);*
9. *There are no unacceptable adverse impacts on the transport network through the transportation of components or source fuels during its construction and/or ongoing operation;*
10. *The proposal includes consideration of the materials needed or generated by the development to ensure the sustainable use and management of resources;*
11. *There are acceptable provisions relating to the decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration.*

*The cumulative impacts of existing and consented renewable energy schemes should also be considered”.*

- 5.37 The supporting text to both policies states that Policy 17 demonstrates the Welsh Government’s support in principle for all renewable energy projects and technologies. It states that in the identified PAAs for Wind Energy there is a presumption in favour of large-scale on-shore wind energy development and the associated landscape change subject to the criteria in Policy 18.
- 5.38 The supporting text to Policies 17 and 18 also refers to the Welsh Government’s target for new renewable energy projects to have at least an element of local ownership from 2020, but specifically states that this is not a planning consideration.
- 5.39 Policy 26 states that the Welsh Government supports the growth and development of existing and new economic opportunities across Mid Wales. The supporting text notes it is vital the region plays its role in the decarbonisation of society and supports the realisation of renewable energy. It states that there is significant potential for wind energy generation in Mid Wales and that all renewable energy generation proposals should seek to maximise the economic, environmental, and social benefits to the communities of Mid Wales. The Welsh Government wishes to see energy generation, storage and management play a role in supporting the Mid Wales economy in particular, including local employment opportunities. The supporting text to Policy 26 reiterates that local ownership is important to ensuring communities in proximity to

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renewable energy development benefit from their presence.

*Planning Policy Wales – Edition 11 (February 2021)*

- 5.40 Planning Policy Wales (PPW) provides the key principles for the planning system in Wales, in terms of what development plans and decisions must achieve and how development should deliver the best possible outcomes. It is not part of the Development Plan however, and according to Future Wales it has substantial weight as a material consideration in the planning process.
- 5.41 The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental, and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation.
- 5.42 Its key principles are:
- Growing our economy in a sustainable manner;
  - Making best use of resources;
  - Facilitating accessible and healthy environments;
  - Creating & sustaining communities; and
  - Maximising environmental protection and limiting environmental impact.
- 5.43 Paragraph 2.14 states that these principles enable the goals and five ways of working set out in the Well-being of Future Generations Act to be realised through land use planning. It also states they act as a catalyst for the positive delivery of the planning system across Wales.
- 5.44 The concept of 'placemaking' is at the heart of PPW. Paragraph 2.15 refers to national placemaking outcomes which it states should be the starting point for plan makers and decision-takers. Figure 5 in PPW identifies each of these outcomes under the PPW key principles. The outcomes under 'Growing Our Economy in a Sustainable Manner' include "Generates its own renewable energy".
- 5.45 Paragraph 2.27 explains the need for planning authorities to take a balanced approach to implement the Well-being of Future Generations Act and its Sustainable Development Principle. It states there may be occasions when one benefit of a development proposal outweighs others, and in such cases robust evidence should be presented to support these decisions, whilst seeking to maximise contributions against all the well-being goals. It identifies a long list of key factors to consider in the assessment process. In summary these include:
- How the proposal would support the achievement of a more prosperous, low carbon, innovative and resource efficient Wales;
  - Whether environmental risks are prevented or appropriately managed;
  - Whether the causes and impacts of climate change are fully taken into account through location, design, build, operation, decommissioning and restoration; and
  - Whether a proposal supports decarbonisation and the transition to a low carbon economy.

5.46 Paragraph 3.30 states that the planning system plays a key role in tackling the climate emergency through the decarbonisation of the energy system and the sustainable management of natural resources. It also states that the transition to a low carbon economy brings opportunities for clean growth and quality jobs, together with wider benefits of enhanced places to live and work, with clean air and water and improved health outcomes.

5.47 Paragraph 3.33 explains that the planning system plays a significant role in managing the significant risk of climate change to people, property, infrastructure and natural resources. It states:

*"Development allowed today will be around for decades to come. The most important decision the planning system makes is to ensure the right developments are built in the right places".*

5.48 The introduction to Section 5 explains that the use of renewable and low carbon energy sources is one of the ways of achieving Productive and Enterprising Places. Other key relevant extracts from PPW include:

*"Low carbon electricity must become the main source of energy in Wales. Renewable electricity will be used to provide both heating and transport in addition to power. The future energy supply mix will depend on a range of established and emerging low carbon technologies". (Paragraph 5.7.1)*

*"Overall power demand is expected to increase...In order to ensure future demand can be met, significant investment will be needed in energy generation, transmission and distribution infrastructure. The system will need to integrate renewable generation with storage and other flexibility services, in order to minimise the need for new generation and grid system reinforcement". (Paragraph 5.7.2)*

*"The benefits of renewable and low carbon energy, as part of the overall commitment to tackle the climate emergency and increase energy security, is of paramount importance. The continued extraction of fossil fuels will hinder progress towards achieving overall commitments to tackling climate change. The planning system should:*

- [...] optimise energy storage; [and]*
- maximise renewable and low carbon energy generation; [...]".*  
*(Paragraph 5.7.7)*

*"Energy storage has an important part to play in managing the transition to a low carbon economy. The growth in energy generation from renewable sources requires the management of the resultant intermittency in supply, and energy storage can help balance supply and demand. Proposals for new storage facilities should be supported wherever possible". (Paragraph 5.7.12)*

*"Wales has an abundant wind resource and, as a result, wind energy forms a key part of meeting the Welsh Government's vision for future renewable energy production". (Paragraph 5.9.16)*

*"Future Wales...identifies Pre-Assessed Areas where the Welsh Government has already modelled the likely impact on the landscape and has found them to be capable of accommodating development in an acceptable way. There is a presumption in favour of large scale wind energy development (including repowering) in these areas, subject to other criteria contained within the policy". (Paragraph 5.9.17)*

*"In determining applications for the range of renewable and low carbon energy technologies, planning authorities should take into account:*

- the contribution a proposal will make to meeting identified Welsh, UK and European targets;*
- the contribution to cutting greenhouse gas emissions; and*
- the wider environmental, social and economic benefits and opportunities from renewable and low carbon energy development". (Paragraph 5.9.19)*

5.49 Section 5 of PPW also includes policies supporting:

- an appropriate mix of energy provision (Paragraph 5.7.6);
- an effective electricity grid network, including additional electricity grid network infrastructure to support PAAs (Paragraph 5.7.8); and
- cross-department co-operation within local authorities to facilitate renewable and low carbon energy development, to maximise the potential for renewable and low carbon energy generation, and to meet renewable energy targets (Paragraph 5.9.1).

#### *Technical Advice Notes*

5.50 A series of Technical Advice Notes (TANs) supplement PPW. Those of relevance to the application are:

- TAN 5: Nature Conservation and Planning (2009);
- TAN 11: Noise (1997);
- TAN 12: Design (2014);
- TAN 15: Development and Flood Risk (2004);
- TAN 18: Transport (2007); and
- TAN 24: The Historic Environment (2017).

#### *Building Better Places: The Planning System Delivering Resilient and Brighter Futures – Placemaking and the Covid-19 Recovery (July 2020)*

5.51 This describes the Welsh Government's planning policy priorities to support recovery following the Covid-19 pandemic crisis. One of its key messages is that a plan-led approach is the most effective way for the planning system to combat climate change. It states "*we must identify, plan for and achieve key steps in achieving the switch to a decarbonised and climate resilient society*".

*Overarching National Policy Statement for Energy (NPS EN – 1) (July 2011)*

- 5.52 This sets out the UK Government's commitment to increasing renewable generation capacity. Paragraph 1.2.1 states that:

*"In England and Wales this NPS is likely to be a material consideration in decision making on applications that fall under the Town and Country Planning Act 1990 (as amended)".*

- 5.53 As this application falls within the definition of a 'Development of National Significance' (DNS), it falls under s62(D) of the TCPA, as amended by The Planning Wales Act.

- 5.54 Paragraph 2.2.6 of EN-1 states that *"the UK needs to wean itself off such a high carbon energy mix: to reduce greenhouse gas emissions, and to improve the security, availability and affordability of energy through diversification"*. Other relevant extracts from the NPS include:

*"The UK needs all the types of energy infrastructure covered by this NPS in order to achieve energy security at the same time as dramatically reducing greenhouse gas emissions"*. (Paragraph 3.1.1)

*"As part of the UK's need to diversify and decarbonise electricity generation, the Government is committed to increasing dramatically the amount of renewable generation capacity. In the short to medium term, much of this new capacity is likely to be onshore and offshore wind"*. (Paragraph 3.3.10)

*National Policy Statement for Renewable Energy Infrastructure (NPS EN – 3) (July 2011)*

- 5.55 Paragraph 2.7.1 states that onshore wind farms will continue to play an important role in meeting renewable energy targets.
- 5.56 Paragraph 2.7.48 acknowledges that modern onshore wind turbines are large structures and that there will always be significant landscape and visual effects from their construction and operation for a number of kilometres around a site. Paragraph 2.7.51 further acknowledges that it is unlikely that the number or scale of wind turbines in a proposal can be changed without significantly affecting its electricity generating output.
- 5.57 The UK Government undertook consultation on revised drafts of NPS EN-1 and NPS EN-3 between September and November 2021. These will also be material considerations for DNS in Wales, although the revised NPS are not yet in force, but are expected to be in 2022.

**Relevant Local Planning Policy**

*Powys Local Development Plan 2011 – 2026 (April 2018)*

- 5.58 The Powys LDP was adopted prior to the publication of Future Wales. This is an important consideration in the planning balance as LDPs are required to be in conformity with Future Wales. In light of this, significant weight cannot be applied to the LDP as the national policy context has changed, the policy expressed in Future Wales supersedes that in the LDP.
- 5.59 Strategic Policy SP7 (Safeguarding of Strategic Resources and Assets) states that development proposals must not have an unacceptable adverse impact on the resource or assets and its

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operation. A list of strategic resources and assets is provided within the Policy which include National Parks, Listed Buildings, Scheduled Monuments, recreational assets such as Public Rights of Way and the valued characteristics and qualities of the landscape throughout Powys. The LDP Proposals Map illustrates an area identified as a Registered Historic Landscape to the north of the Site. An extract of the LDP Proposals Map is included in **Appendix G**.

- 5.60 Policy DM2 (The Natural Environment) requires development proposals to demonstrate how they protect, positively manage and enhance biodiversity and geodiversity interests, including improving the resilience of biodiversity through the enhanced connectivity of habitats within, and beyond the site. It states that proposals will only be permitted where they do not unacceptably affect a range of designated sites.
- 5.61 Policy DM4 (Landscape) states that development proposals outside settlements must not, individually or cumulatively, have an unacceptable adverse effect, on the valued characteristics and qualities of the Powys landscape. All proposals are required to:
1. Be appropriate and sensitive in terms of integration, siting, scale and design to the characteristics and qualities of the landscape including its: topography; development pattern and features; historical and ecological qualities; open views; and tranquillity; and
  2. Have regard to LANDMAP, Registered Historic Landscapes, adjacent protected landscapes (National Parks and Areas of Outstanding Natural Beauty) and the visual amenity enjoyed by users of both Powys landscapes and adjoining areas.
- 5.62 The Policy requires proposals to undertake a Landscape and Visual Impact Assessment (LVIA) if they are likely to have a significant impact on the landscape and/or visual amenity.
- 5.63 Policy DM6 (Flood Prevention Measures and Land Drainage) requires development proposals to assess the implications of development within areas susceptible to all types of flooding. It states that any development that unacceptably increases risk will be refused and sets requirements for proposals near a watercourse or within a floodplain. It also requires all developments to make satisfactory provision for land drainage and to consider the use of Sustainable Drainage Systems (SuDS).
- 5.64 Policy DM10 (Contaminated and Unstable Land) states that development proposals on such land will be permitted where they do not:
1. Result in any additional problems of ground instability or contamination either on or off site and shall remediate the contamination / instability.
  2. Unacceptably adversely affect public health and safety, nature conservation, historic or archaeological interests.
- 5.65 Policy DM13 (Design and Resources) requires development proposals to demonstrate a good quality design and to have regard to the qualities and amenity of the surrounding area, local infrastructure and resources. It includes a range of criteria to be satisfied, where relevant.
- 5.66 Policy T1 (Travel, Traffic and Transport Infrastructure) requires development proposals to incorporate the following:
1. *Safe and efficient flow of traffic for all transport users, including more vulnerable users, and especially those making 'Active Travel' journeys by walking or cycling;*
  2. *Manage any impacts to the network and the local environment to acceptable levels and mitigate any adverse impacts; and,*

3. *Minimise demand for travel by private transport and encourage, promote and improve sustainable forms of travel including Active Travel opportunities in all areas.*

5.67 Policy RE1 (Renewable Energy) states that proposals for renewable and low carbon energy development will be permitted subject to the following criteria:

1. *Within or close to the Strategic Search Areas (SSAs), proposals for wind energy greater than 25MW will be permitted subject to criteria 3 to 5; all other proposals for renewable and low carbon energy will only be permitted where they can demonstrate they would not prejudice the purpose of the SSA.*
2. *Within the Local Search Areas (LSAs) proposals for [non-solar] renewable and low carbon energy will only be permitted where they can demonstrate they would not prejudice the purpose of the LSA.*
3. *Proposals for all types of renewable and low carbon energy development and associated infrastructure either on their own, cumulatively or in combination with existing, approved or proposed development, shall comply with all other relevant policies in the LDP.*
4. *Satisfactory mitigation shall be in place to reduce the impact of the proposal and its associated infrastructure. Proposals shall make provision for the restoration and after-care of the land for its beneficial re-use.*
5. *Where necessary, additional compensatory benefits will be sought by agreement with applicants in accordance with Policy DM1 - Planning Obligations.*

5.68 The Application Site is located within an area designated in the LDP as a Local Search Area for Solar (LSA SL, North of Bwlch y Sarnau).

5.69 The Pre-Application advice from PCC was provided prior to adoption of Future Wales, but noted that the proposed development appeared to lie within and adjoining the SSA C as defined by TAN 8 (see extract in **Appendix D**). The advice stated that, as such, the principal policy test for the proposed development is to demonstrate that the purpose of the SSA is not prejudiced and to comply with criteria 3 – 5 of the Policy. Since the publication of Future Wales, the SSA defined in TAN 8 have been superseded by the PAA, which the proposed development also lies partially within.

*Supplementary Planning Guidance (SPG): Renewable Energy (April 2019)*

5.70 This SPG provides detailed guidance on how the Council will implement the renewable energy-related policies and proposals in the LDP. It states that both the LDP and the SPG have been prepared having regard to the commitment of the Welsh Government to energy reduction and developing the renewables agenda as a major component of its policy. It also recognises that onshore wind will continue to offer the greatest potential to deliver a significant proportion of electricity generation to meet those policy aspirations.

5.71 In respect of LDP Policy RE1 (Renewable Energy) the SPG acknowledges that there have been significant technological advances for onshore wind since the identification of Strategic Search Areas in TAN8, including increases in turbine size. It states that developers should assess not only the visual impact of the size of their development, but also wider socioeconomic impacts on other strategic assets including but not limited to those included in LDP Policy SP7.

5.72 Section 7.9 of the SPG acknowledges that advances in technology mean there is potential for



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energy storage facilities to be developed within renewable and low carbon energy schemes as ancillary infrastructure. It states that proposals for any such facilities should be sensitively sited, accord with Policy SP7 (including the Landscape SPG) and include measures to minimise any visual and noise impacts on local residents.

- 5.73 The SPG includes a section with detailed criteria for determining renewable energy schemes. It states that considerations will vary relative to the scale of the proposal and the characteristics of the area, but includes a list of the information which would likely be requested by the Council.
- 5.74 Paragraph 9.8.1 of the SPG states that renewable / low carbon energy developments should be designed as far as possible to minimise visual intrusion and identifies specific things to consider. These include the use of colour schemes to mitigate the unnatural appearance of the proposed infrastructure and ensuring the infrastructure is the minimum necessary, unobtrusive and screened from view where possible. It states that in rural areas access tracks should have a rural unmade character as far as possible and electrical connections should wherever possible be underground or carried predominantly on wooden poles.
- 5.75 Section 9.10 of the SPG includes requirements for the decommissioning, restoration of renewable energy developments at the end of their operational life.

*Supplementary Planning Guidance (SPG): Landscape (April 2019)*

- 5.76 This SPG provides detailed guidance on the landscape considerations for development proposals and what needs to be submitted with applications to help with the determination process.
- 5.77 Section 6 of the SPG explains how landscape policy in the LDP should be implemented. It identifies a step-by-step process for implementing Policy DM4 (Landscape) in respect of development proposals outside of settlements.
- 5.78 Paragraph 6.20 of the SPG notes that proposals should avoid sensitive landscapes and views, maintain distinctiveness/ sense of place and make a positive contribution to the locality.
- 5.79 Paragraph 6.23 of the SPG explains that for major proposals the Planning Statement should demonstrate an understanding of the site and its landscape and visual context and explain how the development proposal has responded to the issues. Paragraphs 6.25 – 6.35 then provide further detailed advice for Landscape and Visual Impact Assessments (LVIA) to be undertaken as part of an EIA, with Section 7 describing how to undertake site analysis and Section 8 giving detailed advice on how to use LANDMAP to appraise landscape quality. An associated process flow chart is included in Section 9 of the SPG.
- 5.80 Appendix 1 of the SPG includes a schedule of the issues to consider in landscape assessments for wind energy proposals.

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## 6 PLANNING ASSESSMENT OF THE PROPOSED DEVELOPMENT

- 6.1 This chapter of the PS provides an assessment of the key matters to be considered in the planning balance for the proposed development. It considers the technical assessment work undertaken and presented in the ES and appraises that against the relevant planning policy set out in the preceding chapter. The chapter demonstrates the acceptability of the proposed development in planning terms.
- 6.2 The assessment of the planning performance of the proposed development is focussed on the following key matters:
- The Principle of Development;
  - Consideration of Policies 17 and 18 in Future Wales, in relation to:
    - Landscape Character
    - Visual Impact
    - Ecology and Ornithology
    - Cultural Heritage
    - Shadow Flicker, Noise, Reflected Light, Air Quality or Electromagnetic Disturbance
    - Aviation and Defence
    - Transport
    - Sustainable use of materials
    - Decommissioning; and
    - Cumulative effects
  - Other Material Considerations; and
  - Compliance with the Well-being of Future Generations (Wales) Act 2015.
- 6.3 The planning assessment presented below tests the proposed development against the policy provisions of Future Wales as the highest tier of the development plan in Wales, the most recent expression of national policy for renewable energy and the principal policy for decision-making on DNSs. The assessment also considers the provisions of other national planning and energy policy and PPW as material considerations to the decision-making process.

### **The Principle of Development**

- 6.4 The UK and Welsh Governments, and PCC, have declared a climate emergency. In response, both UK and Welsh Governments have legislated an ambitious net zero emissions target by 2050.
- 6.5 As identified in section 5 above, the Welsh Government has also set an interim target of net Welsh emissions to be 63% lower than the 1990 baseline by 2030. In December 2020, the CCC published a progress report on emissions reduction in Wales<sup>6</sup> that shows that emissions of greenhouse gases have fallen by 31% since 1990 according to 2018 reports. Although this progress is likely to meet 2020 targets, there is still much needed to be done in order to meet

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<sup>6</sup> [The path to Net Zero and progress on reducing emissions in Wales - Climate Change Committee \(theccc.org.uk\)](https://theccc.org.uk)

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the net zero target by 2050, and the interim targets set by the Welsh Government.

- 6.6 The Welsh Government's own figures on greenhouse gas emissions<sup>7</sup> demonstrate a more gradual decline in emissions from the 1990 baseline (55 megatonnes CO<sub>2</sub> equivalent). There was a reduction from the baseline to 48 megatonnes in 2016, with the 2020 target of 40% reduction from 1990 levels (34 megatonnes), set under the Welsh Government Climate Change Strategy 2012, unlikely to be met. According to the Welsh Government figures, Wales is substantially behind its own net zero target by 2050. The evidence for the CCRA3 shows that the effects of climate change are already being seen in Wales, including rising sea levels and an increase in extreme heat events, highlighting the need for greater urgency in decarbonisation efforts.
- 6.7 Welsh energy policy acknowledges that renewable energy development is a key contributor to the net zero target. Specifically, *Prosperity for All: A Low Carbon Wales* seeks to accelerate the deployment of renewable energy generation in order to cut emissions. At a UK level, the *National Infrastructure Strategy* states that to achieve net zero by 2050, the power system will need to be carbon free and significantly larger to cope with additional demand. As set out in the *Energy White Paper*, generation of clean energy may need a four-fold increase to meet this additional demand and to replace the retiring of old capacity.
- 6.8 Appendix 10.8 of the ES estimates that:
- the net emissions of carbon dioxide arising from the proposed development is 154,235 tonnes of CO<sub>2</sub>;
  - the energy generated by the proposed development would produce a CO<sub>2</sub> saving ranging from an estimated 66,085 tonnes to 117,275 tonnes per year, dependent upon the composition of fuel types (gas, nuclear, renewables etc) in the UK energy production at the time of estimation; and
  - the payback period for the carbon emissions arising from the proposed development ranges from 0.7 to 6.5 years. The expected figure will be influenced by a range of factors at the time of installation, but it is realistic to expect the scheme, based on current factors, would repay its carbon debt within 1.3 years, resulting in a proposed development that will be carbon positive for the mainstay of its operational lifetime.
- 6.9 Planning policy in Wales is also clear in its support for the principle of renewable energy development, primarily through Future Wales and PPW at a national level, and the Powys LDP at a local level. This is highlighted in the pre-application advice provided by PEDW, which concluded that there is no obvious policy objection to the principle of the proposed Garn Fach development, and that the nature, scale and location of the development do not conflict with the general aims of the national and local policy.
- 6.10 Future Wales states that, together with PPW, it ensures the planning system focuses on delivering a decarbonised and resilient Wales, including through energy generation. Policy 17 of Future Wales states that the Welsh Government strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales, and that decision-makers must give significant weight to the need to meet Wales' international commitments, and the target to generate 70% of consumed electricity by renewable means by 2030. Welsh Government figures<sup>8</sup> estimate that the renewable share of Wales' electricity generation

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<sup>7</sup> <https://airquality.gov.wales/maps-data/emissions/greenhouse-gases>

<sup>8</sup> Welsh Government (2009) Electricity Generation in Wales

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increased from 25% in 2018 to 27% in 2019. In terms of consumed electricity, the figures estimated that 51% of electricity consumed in Wales is provided through renewable sources, highlighting that achieving the 70% target by 2030 is challenging. The significant weight to be placed on the need to meet Wales' renewable energy targets is evident in recent decisions taken by Welsh Ministers in respect of other DNS applications<sup>9</sup>.

- 6.11 Future Wales also considers the responsibility of the Mid Wales region specifically, with the supporting text to Policy 26 explaining it is vital the region plays its role in the decarbonisation of society and supports the realisation of renewable energy. Future Wales states that there is significant potential for wind energy generation in Mid Wales.
- 6.12 PPW also strongly supports the principle of development, paragraph 3.30 states that the planning system plays a key role in tackling the climate emergency through the decarbonisation of the energy system. Section 5.7 (Energy) of PPW states that low carbon electricity must become the main source of energy in Wales, and that significant investment will be needed in energy generation, transmission and distribution infrastructure in order to ensure future demand can be met. It also states that the benefits of renewable and low carbon energy, as part of the overall commitment to tackle the climate emergency and increase energy security, is of paramount importance.
- 6.13 With regard to local policy, Policy RE1 of Powys' LDP is also supportive of the proposed development in principle, as criterion 1 of the policy states that within or close to SSAs (as identified in TAN 8), proposals for wind energy greater than 25MW will be permitted subject to other detailed criteria. The proposed development lies partially within the former SSA C, but since the adoption of the LDP, the Welsh Government published Future Wales, which superseded TAN8 and has primacy in the planning policy hierarchy. Future Wales replaced SSAs as defined in TAN 8 with PAAs for large scale wind energy. As previously stated, the majority of the proposed development (including approximately 50% of the turbines) lies within a PAA.
- 6.14 Although the Site falls within a Local Search Area for Solar as designated under Policy RE1 of the LDP, non-solar proposals for renewable and low carbon energy are permitted within these areas where the proposals can demonstrate they would not prejudice the purpose of the LSA. The capacity assessment<sup>10</sup> supporting the designation of the North of Bwlch y Sarnau LSA identifies a potential for 50MW of energy capacity within the LSA. The installation of the proposed 17 wind turbines would generate up to 85MW, which is greater than the potential capacity identified from solar in the capacity assessment, and therefore would not prejudice the purpose of the LSA. Remaining areas with the LSA are available for further solar deployment.
- 6.15 National and local policies are clear on their support for renewable energy generation, and are also specifically clear in their support for the principle of large scale wind turbine development at the location of the proposed development.

### **Future Wales: Policies 17 and 18**

#### *Landscape Character*

- 6.16 The Site falls partially within three LANDMAP units – Warn Ddubarthog Wind Farm (MNTGMVS443), Improved upland, west of upper Ithon (RDNRVS123), and Upland moor, north

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<sup>9</sup> Wauntysswg Solar (DNS/3213639), Llanwern Solar (DNS/3213968), and Penderi (DNS/321364)

<sup>10</sup> Appendix 1 of Powys' Supplementary Planning Guidance on Renewable Energy

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& west of Abbeycwmhir (RDNRVS115). The LANDMAP units have a medium sensitivity, and as set out in Chapter 6 of the ES, moderate-major effects are predicted, which are significant in EIA terms. Part of the Kerry Ridgeway (MNTGMVS254) LANDMAP unit falls within 2.5km of the proposed development, and as the unit has a high sensitivity, a moderate effect is predicted on a small area of the Kerry Ridgeway unit which is expected to be significant.

- 6.17 With regards to the proposed development's acceptability in relation to landscape impacts, the Site is located partially within a PAA for Wind Energy as designated in Policy 17 of Future Wales. Within this area, the Welsh Government has already modelled the likely impact on the landscape and has found it to be capable of accommodating development in an acceptable way. The methodology<sup>11</sup> used in refining the boundaries of PAAs for Wind Energy considered the intervisibility between nationally designated landscapes and wind turbines up to 250m blade tip height, as this represented the maximum height scenario in terms of turbine sizes likely to come forward in applications at the time. The proposed development includes turbines up to 149.9m blade tip height, and as such, despite significant changes predicted to four landscape units, national policy supports the conclusion that the Garn Fach turbines falling within the PAA (see **Appendix F**) are acceptable at this location, subject to the criteria in Policy 18 of Future Wales.
- 6.18 Criterion 1 of Policy 18 of Future Wales states that developments outside the PAAs should not have an adverse impact on the surrounding landscape, particularly on the setting of National Parks and AONBs. No significant effects are predicted within the ES on the setting of any National Parks or AONBs. The turbines that do not fall within the PAA are the ones nearest to the existing P&L wind farm. In relation to the Llaithddu wind farm application, the Inspector's report on the conjoined Public Inquiry concluded that as the northern group of turbines were within approximately 1km of the P&L turbines, they would be within an area already characterised as a wind farm landscape. The Inspector considered that although there will always be significant landscape effects connected to large wind turbines, the landscape impact of the northern turbines was acceptable.
- 6.19 Policy DM4 of the Powys LDP states that development outside settlement boundaries such as the proposed development must not have an unacceptable adverse effect on the valued characteristics and qualities of the Powys landscape. The site's location within the PAA demonstrates that the adverse effect is considered acceptable in national policy terms. Whilst it is recognised that the proposed development will result in an adverse effect in landscape terms, it is not considered that this effect is of such significance as to be considered unacceptable.

#### *Visual Impact*

- 6.20 Chapter 6 of the ES predicts significant visual effects predicted on nearby receptors, including local communities (at David's Well and Bwlch-y-Sarnau), users of the minor road network around the eastern and southern sides of the Site, users of recreational routes (PRoWs and open access land within the Site and on open elevated points up to 8km from the site, and users of Glyndŵr's Way and Kerry Ridgeway long distance footpath), and visitors to Gors Lydan summit.
- 6.21 Policy 18 of Future Wales is supportive of renewable energy projects, subject to a number of criteria. Criterion 2 of Policy 18 states that there should be no unacceptable adverse visual

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<sup>11</sup> [Arup and The Welsh Government \(June 2019\) Assessment of onshore wind and solar energy potential in Wales: Stage 2 - Refinement of Priority Areas for Wind and Solar Energy](#)

impacts on nearby communities and individual dwellings. The layout of the turbines within the proposed development has been designed to minimise the visual impact on nearby receptors, but there will be residual adverse impacts on the nearby communities of David's Well and Bwlch-y-Sarnau.

- 6.22 The Inspector in relation to the Llaithddu wind farm application considered that there will always be significant visual effects connected to large wind turbines, but their arrangement should be carefully designed to minimise those effects. The Inspector concluded that the visual effect of the "southern group of turbines" would be unacceptable for the Llaithddu wind farm because of the linear layout and design of the group, and the decision to place the proposed turbines on the highest ground on a ridge. The layout of the proposed development does not extend as far south as the layout for Llaithddu Wind Farm. As a result, the turbines within the proposed Garn Fach development are now located approximately 4km from Bwlch-y-Sarnau (rather than 1.8km), which has reduced the impact on the communities of both Bwlch-y-Sarnau and David's Well. The different level of visual impact is evident in the comparative wireframes included in **Appendix E**, which shows that views of the proposed Garn Fach development from Bwlch-y-Sarnau (Viewpoint 2) will not have turbines within close proximity as was the case with the Llaithddu Wind Farm. From David's Well (Viewpoint 3), views of the proposed Garn Fach development will be reduced, extending to only 70 degrees field of view, rather than 120 degrees field of view as was the case with the Llaithddu Wind Farm. Whilst it is recognised that the proposed development will result in an adverse visual effect, it is considered that this effect is less than that deemed unacceptable by the Inspector in the Llaithddu decision and is not of such significance as to be considered unacceptable in the current proposed development.

#### *Ecology and Ornithology*

- 6.23 Criteria 3, 4 and 5 of Policy 18 of Future Wales 3 relate to ecological sites, and biodiversity net benefit. They state that developments should:
- have no adverse effects on the integrity of Internationally designated sites (including National Site Network sites and Ramsar sites) and the features for which they have been designated (unless there are no alternative solutions, Imperative Reasons of Overriding Public Interest (IROPI) and appropriate compensatory measures have been secured);
  - have no unacceptable adverse impacts on national statutory designated sites for nature conservation (and the features for which they have been designated), protected habitats and species; and
  - include biodiversity enhancement measures to provide a net benefit for biodiversity.
- 6.24 At a local level, Policy DM2 of Powys' LDP requires development proposals to demonstrate how they protect, positively manage and enhance biodiversity and geodiversity interests, including improving the resilience of biodiversity through the enhanced connectivity of habitats within, and beyond the site.
- 6.25 Chapters 8 and 9 of the ES consider the likely significant effects of the proposed development. With mitigation measures and monitoring, no adverse residual effects are predicted on Internationally or nationally designated sites, and no significant adverse residual effects are predicted on protected habitats or species. A moderate beneficial effect is predicted on Great Crested Newts, due to the creation of habitat connectivity features and enhancement of terrestrial habitat, which will be significant for the maintenance of the GCN population on site, and specifically meets the requirement in Policy DM2 of the LDP for enhanced habitat connectivity. Enhancement of terrestrial habitat within the southern parcel of the proposed development is expected to provide further

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benefits to curlew, golden plover and great crested newts.

- 6.26 As such, with appropriate planning conditions, the proposed development complies with criteria 3, 4 and 5 of Policy 18 in Future Wales, and with Policy DM2 of the LDP.

*Cultural Heritage*

- 6.27 Criterion 6 of Policy 18 in Future Wales states that there should be no unacceptable adverse impacts on statutorily protected built heritage assets. Strategic Policy SP7 in Powys' LDP states that development proposals must not have an unacceptable adverse impact on resources including listed buildings and scheduled monuments. Chapter 11 of the ES predicts that the setting of Fowler's Arm Chair stone circle and round cairns (Scheduled Monument, which is located within the site boundary) would be significantly affected by the presence of the proposed development.

- 6.28 The Inspector in relation to the Llaithddu wind farm application concluded that there would be no unacceptable effects on heritage assets, including Fowler's Arm Chair, despite significant effects being predicted. The Inspector reasoned that whilst Fowler's Arm Chair is clearly indicated on ordnance survey maps, public access is not currently permitted to the site itself, and the monument is very indistinct and difficult to interpret correctly amongst a jumble of stones on the site. As the Llaithddu proposals included provision of public access by a stile with an adjacent information panel, the Inspector concluded that public access and understanding would improve, which would outweigh any adverse impact on the setting through the presence of turbines. The proposed Garn Fach development will also include a permissive footpath and information board at Fowler's Arm Chair as part of the development which again is considered to outweigh any adverse impact on the setting through the presence of turbines.

- 6.29 The layout of the Garn Fach turbines have been designed to minimise the impact on the setting of nearby heritage assets as much as possible. Although there will be a residual adverse effect on the setting of heritage assets, it is not considered that this effect is of such significance as to be considered unacceptable.

*Shadow Flicker, Noise, Reflected Light, Air Quality or Electromagnetic Disturbance*

- 6.30 Criterion 7 of Policy 18 in Future Wales states that there should be no unacceptable adverse impacts by way of noise disturbance. Chapter 7 of the ES considered noise effects from the proposed developments, including vibration, blade swish, tonal noise, infra-sound and low frequency noise. Construction noise was scoped out of the assessment as construction activities are typically distant from noise sensitive receptors such that the relevant noise limits will be met.

- 6.31 The assessment showed that operational noise levels from the proposed development in isolation met the derived noise limits at all receptor locations, but that the combined effect of the proposed development and existing P&L development exceeded the daytime noise limit by 1.3 dB at Pabyllwdd Barn, Pabyllwdd Ganol, The Barns, and Fwnog during the daytime at windspeeds between 6 and 7.5 m/s, although the predictions assume downwind propagation at all times which cannot occur in practice. Operational noise will be controlled through noise limits that apply at residential receptor locations around the site, ensuring that cumulative noise impacts are acceptable. No residual effects are predicted on noise within the ES.

- 6.32 In relation to electromagnetic disturbance, Chapter 12 of the ES predicts no significant adverse

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effects on telecommunication links due to the proposed development.

- 6.33 In relation to shadow flicker, Chapter 15 of the ES concludes that the layout of the proposed development has been designed so as to eliminate potential shadow flicker effects. In addition, no disturbance is expected from reflected light due to the nature of the proposed development.
- 6.34 In relation to effects on air quality, Chapter 16 of the ES explains that due to the temporary nature of the proposed development, with very little operational effects on air quality, any potential adverse effects to air quality during the construction phase through dust creation, vehicle emissions and dewatered land will be short-lived and of negligible effect.
- 6.35 As such, with appropriate planning conditions, the proposed development complies with criterion 7 of Policy 18 in Future Wales.

#### *Aviation and Defence*

- 6.36 Criterion 8 of Policy 18 in Future Wales requires that there are no unacceptable impacts on the operations of defence facilities and operations (including aviation and radar) or the Mid Wales Low Flying Tactical Training Area (TTA-7T). In relation to aviation, the turbines will be installed with infra-red lighting that is not visible to the naked eye, to ensure air safety for military low flying. Subject to this mitigation, as set out in Chapter 12 of the ES, the Ministry of Defence have not raised an objection to the proposed development.

#### *Transport*

- 6.37 Criterion 9 of Policy 18 states that there should be no unacceptable adverse impacts on the transport network through the transportation of components during its construction and/or ongoing operation. Policy T1 of Powys' LDP requires development proposals to incorporate safe and efficient flow of traffic for all transport users, and manage any impacts to the network and the local environment to acceptable levels and mitigate any adverse impacts.
- 6.38 Chapter 13 of the ES considered likely significant effects on transportation during construction, including in relation to severance, driver delay amenity and fear and intimidation. The ES predicts significant effects from traffic flows on the C2025 / U2835 near to the Site, prior to the application of mitigation measures, where there will be a 166.16% increase in overall traffic. Mitigation measures proposed are for the implementation of a Construction Traffic Management Plan, and remedial works at key points of the route in order to accommodate Abnormal Indivisible Loads, which will be required by conditions. The ES does not conclude any significant residual effects from the proposed development in relation to transport and access.
- 6.39 As such, with appropriate planning conditions, the proposed development complies with criterion 9 of Policy 18 in Future Wales, and with Policy T1 of the LDP.

#### *Sustainable use of materials*

- 6.40 Criterion 10 of Policy 18 in Future Wales requires consideration of the materials needed or generated by the proposed development to ensure the sustainable use and management of resources. As stated above, Appendix 10.8 of the ES shows that there will be a carbon saving from the proposed development, with an expected payback of any carbon emissions expected to arise within 1.3 years.



- 6.41 Chapter 5 of the ES estimates that half of the stone required during construction will be extracted on Site from the two borrow pits included as part of the proposed development. In addition, the majority of construction materials for the substation will largely be drawn from the local or regional area to avoid sourcing from more distant suppliers. All wind farm materials will be either re-used, recycled or sustainably disposed to licenced sites upon decommissioning. Consideration has been given to sustainable use of materials and resources, and the proposed development complies with criterion 10 of Policy 18 in Future Wales.

*Decommissioning*

- 6.42 Criterion 11 of Policy 18 in Future Wales requires acceptable provisions relating to the decommissioning of the proposed development at the end of its lifetime, including the removal of infrastructure and effective restoration. In addition to construction and operational effects, the ES considered the likely effects of the decommissioning phase of the proposed development, and no effects were considered likely to be significant at this stage. As such, the proposed development complies with criterion 11 of Policy 18 in Future Wales.

*Cumulative effects*

- 6.43 Policy 18 of Future Wales also requires consideration of cumulative impacts of existing and consented renewable energy schemes. The ES considers the cumulative effects of the proposed development and other schemes. Some cumulative effects are predicted in Chapter 6 of the ES on the Shropshire Hills AONB, but these are not considered to prejudice the values or integrity of the designated landscape. Cumulative effects are also identified in Chapter 11 in relation to the setting of heritage assets, in particular Polyn y Groes scheduled monument, 300m north of the site. The layout of the Garn Fach turbines have been designed to minimise the impact on the setting of nearby designated landscapes and heritage assets as much as possible. Although there will be a residual cumulative effect on the setting of heritage assets, it is not considered that this effect is of such significance as to be considered unacceptable.
- 6.44 Overall, the proposed development can be considered to comply with all aspects of Policies 17 and 18 in Future Wales.

**Other material considerations**

*Hydrology and Geology*

- 6.45 Policy DM6 of Powys' LDP states that any development that unacceptably increases flood risk will be refused. Chapter 10 of the ES predicts no significant adverse effects on hydrology or geology due to the proposed development, with impacts to local hydrology controlled, so as to avoid downstream effects to the Rivers Ithon and Wye. The proposed development complies with the requirements set out in Policy DM6 of the LDP.

*Socio-economic*

- 6.46 Chapter 14 of the ES predicts a range of residual effects as part of the socio-economic assessment, including effects on recreation during construction (adverse) and operation (beneficial), and community benefits through shared/local ownership and employment. There will also be beneficial economic impacts through generation of £31,028,135 Gross Value Added during the lifetime of the proposed development, and creation and safeguarding of jobs.

**Compliance with the Well-being of Future Generations (Wales) Act 2015**

- 6.47 The proposed development would improve the economic, social, environmental and cultural well-being of Wales, in accordance with the sustainable development principle, under Section 3 of the Well-Being of Future Generations (Wales) Act 2015, and is in accordance with the sustainable development principle through its contribution towards one or more of the Welsh Ministers' well-being objectives set out as required by Section 8 of the Well-Being of Future Generations (Wales) Act 2015.
- 6.48 In addition to the benefits of energy generation and carbon savings associated with the proposed development, the proposed development will generate wider benefits, including habitat enhancement, access and interpretation for Fowler's Arm Chair scheduled monument, and economic impact including job creation.
- 6.49 In addition, the applicant is proposing to set up a Community Benefit Fund that will bring benefits to the wider community, and to also provide an opportunity for local communities to invest in up to 10% in the project. It is noted that the ownership of the project and the benefit fund will not be material considerations for the planning balance, but for completeness, further information is included in the Collaborative Benefits Report accompanying this Application. The Collaborative Benefits Report also illustrates how the Applicant has adopted ways of working involving local stakeholders that represent the whole community and collaborating in order to maximise long-term benefits for the community through setting up a Community Liaison Group.
- 6.50 Section 5 of PPW explains ways in which places can contribute to each of the seven goals of the Well-being of Future Generations Act<sup>12</sup>, including:
- *"achieved through...increased economic activity across all sectors and at all scales. This is realised through [...] investment in renewable and low carbon energy sources..."* (A Prosperous Wales);
  - *"supported by [...] renewable energy generation"* (A Resilient Wales);
  - *"achieved through the reduction in emissions and air pollution as a result of generating energy from non-carbon sources. Greater distribution of our economic wealth can also help alleviate poverty which is a key determinant of health."* (A Healthier Wales);
  - *"achieved through promoting sufficient employment and enterprise opportunities for people to realise their potential and by recognising and building on the existing economic strengths of places to assist in delivering prosperity for all."* (A More Equal Wales);
  - *"created by people who have access to fulfilling work..."* (A Wales of Cohesive Communities);
  - *"supported by the provision of jobs and economic activity..."* (A Wales of Vibrant Culture and Thriving Welsh Language); and
  - *"promoted by reducing our carbon footprint through [...] the promotion of renewable energy over carbon-emitting sources and resource choices through which multiple benefits can be realised."* (A Globally Responsible Wales).
- 6.51 As such, through the benefits of the proposed development (including renewable energy

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<sup>12</sup> Page 74 of PPW, Edition 11

generation, decarbonisation, economic impact, and job creation/safeguarding for the local workforce), the proposed development is considered to be in accordance with all seven of the well-being goals set out in the Well-being of Future Generations Act.

### **Planning Balance**

6.52 The main issues to be considered in the planning balance are:

- The 'in principle' acceptability of the proposed development in accord with national planning policy;
- the Site's location (partially) within an area designated as a PAA for Wind Energy in Future Wales, where the likely impact on the landscape has already been modelled and the area found to be capable of accommodating development in an acceptable way;
- the adverse visual impact on the nearby communities of David's Well and Bwlch-y-Sarnau;
- the adverse impact on the setting of heritage assets; and
- the need to generate electricity by renewable means in order to meet Wales' international commitments, and its own internal target of achieving net zero greenhouse gas emissions by 2050.

6.53 The location of the proposed development has been identified as an area where the landscape can accommodate large scale wind farms within national policy. This applies to Turbines 10-17 which fall within a PAA as designated in Future Wales. Turbines 1-9 are located outside the PAA, but are not expected to have an adverse impact on the surrounding landscape, particularly on the setting of National Parks and AONBs, and therefore comply with Criterion 1 of Policy 18 of Future Wales. In addition, Turbines 1-8 are located within an area where wind turbine development was considered acceptable by the Inspector for the Llaithddu planning inquiry.

6.54 Although there are adverse visual impacts and impacts on the setting of historic assets related with the proposed development, as stated above, it is not considered that the impacts on visual amenity and heritage assets is of such significance as to be considered unacceptable.

6.55 The installation of the proposed 17 wind turbines would represent an installed capacity of circa 85MW and contribute to achieving Welsh Government's target to generate 70% of consumed electricity by renewable means by 2030. The projected annual electricity output is expected to be 260,610Mhr based on a 35% capacity factor. The electricity generated would be the equivalent to the domestic requirements of 69,000 homes based on annual average household consumption. The proposed development would also contribute to the ambitious targets set by the UK and Welsh Governments to decarbonise energy generation and achieve their net zero emissions target by 2050 in response to the climate emergency. The energy generated by the proposed development would produce a CO2 saving ranging from an estimated 66,085 tonnes to 117,275 tonnes per year, dependent upon the composition of fuel types (gas, nuclear, renewables etc) in the UK energy production at the time of estimation. The payback period for the carbon emissions arising from the proposed development ranges from 0.7 to 6.5 years. The expected figure, based on current factors, would repay its carbon debt in 1.3 years, resulting in a scheme that will be carbon positive for the mainstay of its operational lifetime.

6.56 The most recent figures from the CCC show that emissions of greenhouse gases had fallen by

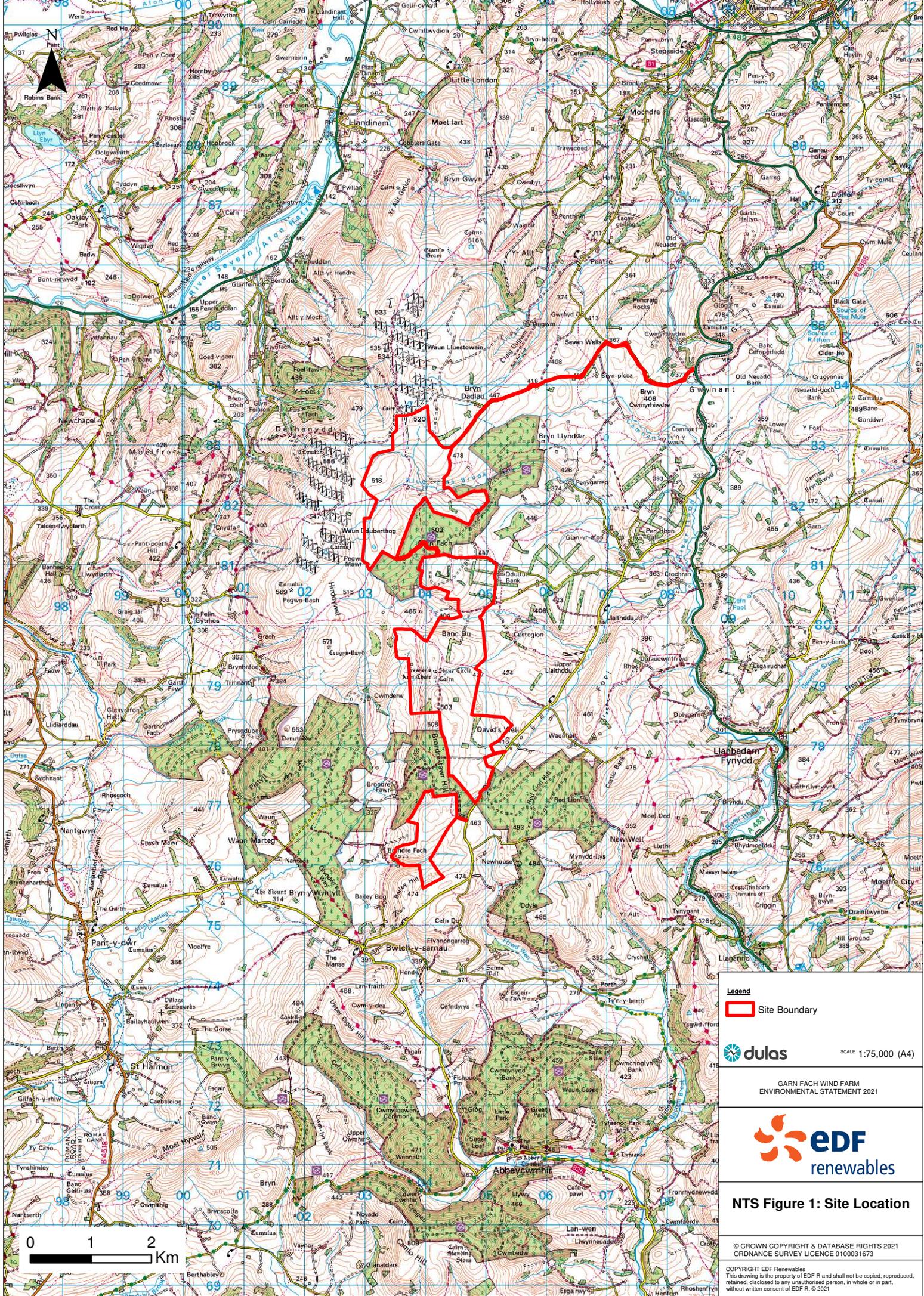
31% since 1990 by 2018, with much more progress needed on decarbonisation in order to achieve net zero by 2050, and the interim target of net Welsh emissions to be 63% lower than the baseline by 2030. The need for continued decarbonisation, to which the proposed development will greatly contribute, was highlighted in the most recent evidence for the CCRA3, which shows that the climate in Wales is already changing, with an increase of 0.9°C in the average annual temperature since the mid-1970s, an increase of 2.0% in annual mean rainfall and 6.1% in sunshine hours during the same period, approximately 1.4mm of sea level rise per year since 1901, and an increase in extreme heat events.

- 6.57 Future Wales is clear that decision-makers must give significant weight to Wales' need to meet its international commitments, and its target of generating 70% of consumed electricity by renewable means by 2030. Based on the contribution that the proposed development will make to those targets, it is considered that the weight that should be afforded to this consideration outweighs any other material considerations related to the proposed development.

## **7 CONCLUSION**

- 7.1 The planning application seeks planning permission for the following proposed development:  
*"Proposed onshore wind farm and energy storage facility, together with associated equipment, infrastructure and ancillary works".*
- 7.2 As the proposed development comprises an electricity generating station with an installed generating capacity of between 10 and 350 MW, it falls within the definition of a 'Development of National Significance' (DNS) under regulation 4 of the Developments of National Significance (Specified Criteria and Prescribed Secondary Consents) (Wales) Regulations 2016, for the purposes of s62(D) of the Planning Wales Act.
- 7.3 Future Wales is clear that decision-makers must give significant weight to Wales' need to meet its international commitments, and its target of generating 70% of consumed electricity by renewable means by 2030. In this light, whilst the proposed development will result in some, albeit limited, adverse effects, it is considered that these impacts are outweighed by the contribution that the proposed development will make to meeting Wales' renewable energy targets and net zero objectives.
- 7.4 It can accordingly be concluded that the proposed development should be granted planning permission, subject to appropriate and reasonable conditions being imposed.

**APPENDIX A**  
**SITE LOCATION PLAN**



**Legend**

 Site Boundary

 **dulas** SCALE 1:75,000 (A4)

GARN FACH WIND FARM  
ENVIRONMENTAL STATEMENT 2021

 **EDF**  
renewables

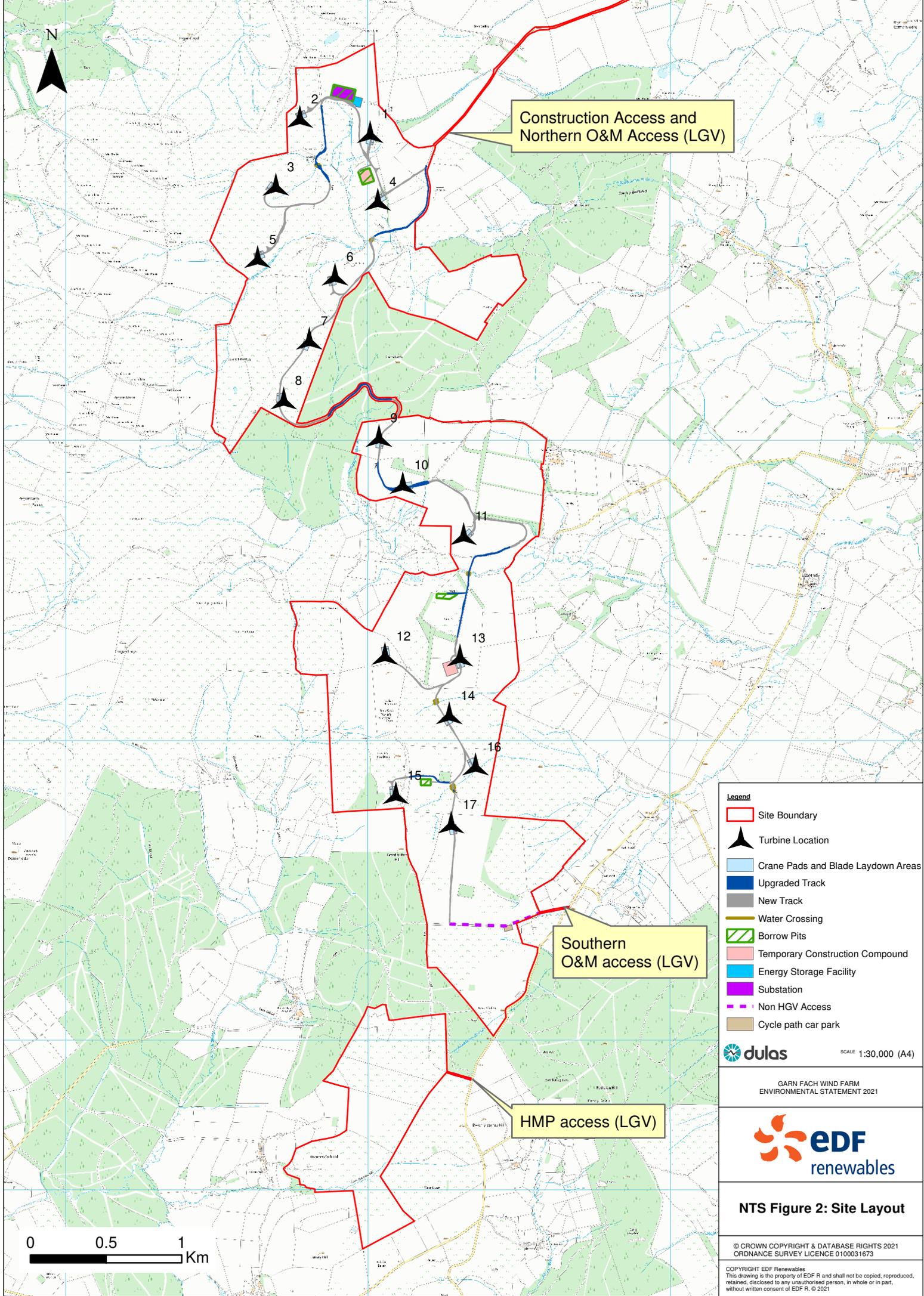
**NTS Figure 1: Site Location**

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**APPENDIX B**  
**SITE LAYOUT PLAN**





Construction Access and Northern O&M Access (LGV)

Southern O&M access (LGV)

HMP access (LGV)

- Legend**
- Site Boundary
  - Turbine Location
  - Crane Pads and Blade Laydown Areas
  - Upgraded Track
  - New Track
  - Water Crossing
  - Borrow Pits
  - Temporary Construction Compound
  - Energy Storage Facility
  - Substation
  - Non HGV Access
  - Cycle path car park

**dulas** SCALE 1:30,000 (A4)

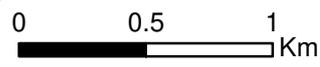
GARN FACH WIND FARM ENVIRONMENTAL STATEMENT 2021



**NTS Figure 2: Site Layout**

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**APPENDIX C**  
**PLANNING INSPECTORATE (now**  
**PEDW) DNS**  
**PRE- APPLICATION RESPONSES**  
(dated 4th August 2020 and 10th March  
2021)



The Planning Inspectorate  
Yr Arolygiaeth Gynllunio

# DNS Pre-application Advice

## 3244499: Garn Fach Wind Farm

4 August 2020

**Prepared by:** Christopher Sweet MPlan

**This advice should be read in conjunction with the Planning Inspectorate's procedural guidance on Developments of National Significance (DNS). Advice is provided on the basis of the information submitted to the Planning Inspectorate on 8<sup>th</sup> July 2020 and without the benefit of a site visit. The advice is not binding and does not prejudice any recommendation made by an Inspector or any decision made by the Welsh Ministers in relation to a development of this nature on this site.**

**The questions and issues raised in the request for advice are addressed in order below.**

## **1. Pre-Application Consultation**

Based on the information provided, it is considered that the following consultees would be required to be consulted under Article 9 and Schedule 5 of the [Developments of National Significance \(Procedure\) \(Wales\) Order 2016](#) (as amended) (the Order). It appears that the site comes close to the area for which Severn Trent Water is the water and sewerage undertaker, but it has not been possible to confirm whether any part of the site falls within that area. As such, the applicant will need to confirm this and consult Severn Trent Water in addition to Dŵr Cymru if required. Overall, it should be noted that the Applicant is required to satisfy themselves that they have met the relevant legislative requirements.

### ***Specialist consultees***

Natural Resources Wales

Cadw (the Welsh Ministers)

Welsh Government Transport Division (as Highways Authority for Trunk Roads)

Powys County Council (as Local Highways Authority)

Dŵr Cymru (Water and Sewerage Undertaker)

### ***Relevant persons***

The requirement to consult 'relevant persons' only applies to applications that include prescribed secondary consents; see below for advice relating to secondary consents.

### ***Scope of pre-application consultation***

The requirement for statutory pre-application consultation arises from Section 61Z of the Town & Country Planning Act 1990 (as amended), which was inserted by the [Planning Wales Act 2015](#). We encourage open and constructive dialogue with relevant consultees, particularly where there are issues of a technical nature that are within the consultee's area of responsibility. This approach is recommended to the applicant in this case.

Given the scale and location of the development and the planning history of the site, it is suggested that the Applicant pursue a thorough up-front process of informal consultee engagement in addition to the statutory requirements where possible. Such an approach can allow for issues to be resolved prior to examination and for outstanding areas of disagreement to be refined to specific issues. However, it is also acknowledged that this is

not always possible, and that the Applicant may wish to limit consultation to the level required by legislation. The minimum statutory requirements for pre-application consultation are set out at Article 9 of the Order and can be summarised as follows:

- For specialist consultees, provide written 'requisite notice' in the form set out at Schedule 2 to the Order and allow the 42 days from that notice for a response, as required by Article 10(1).
- For relevant persons (if required), provide written 'requisite notice' in the form set out at Schedule 1 to the Order and allowing 42 days from that notice for responses, as set out in the notes to Schedule 1.

Our [Guidance](#) provides further explanation regarding Pre-App Consultation in paragraphs 2.8 to 2.13.

It should be noted that there are also requirements for consultation with Community Consultees under Article 9 and for more general publicising of the proposed application set out at Article 8 of the Order and those requirements must also be satisfied. Pre-application consultation and publicity under Articles 8 and 9 must result in the production of the Pre-application Consultation Report required by Article 11 of the Order, which also provides details of the content that must be included in that report.

Given the nature and location of the proposal, it is also strongly recommended that the Applicant pursue a best practice approach to meaningful community engagement. In light of the current Covid-19 restrictions, this may require the creative use of social media and other online services, also recognising that some members of the public may not have access to the internet and adopting a direct mailing strategy where appropriate. The Applicant's attention is drawn to the Welsh Government's advice to LPAs on site notices and other publicity contained in the [Dear CPO letter of 29<sup>th</sup> April 2020](#).

## 2. Procedural Matters

### ***Does the application qualify as a Development of National Significance?***

The status of the development as a DNS can only be formally confirmed via the 'notification of proposed development' process set out at Article 5 of the Order. However, for the purposes of this advice and based on the information provided, it is considered that the proposal does fall within the thresholds for Onshore Wind Generating Stations set out at Article 4A of the [Developments of National Significance \(Specified Criteria and Prescribed Secondary Consents\) \(Wales\) Regulations 2016 \(as amended\)](#) and that any application for planning permission would therefore fall under the DNS process.

## 3. Form and Content of the Application

The following advice is provided with the intention of assisting the Applicant to shape their application, but it does not preclude an appointed Inspector or the Welsh Ministers from seeking further information to aid determination.

### ***Main issues and considerations likely to be relevant to the application and the scope of assessment required***

As noted in the Applicant's request for pre-application advice, the Planning Inspectorate issued an EIA Scoping Direction (SD) relating to the application in March 2020. The SD agreed the topic areas to be covered and the appropriate level of assessment for those topics that were scoped into the Environmental Statement (ES). Given the overlap in

coverage, the ES based on that Scoping Direction will form the bulk of the assessment and information required on the topics most relevant to the application (amongst others). As such, where topics are considered to be main planning issues for the application and were also scoped into the ES, they are not covered in detail in the following section. For clarity, those topics considered likely to be main planning issues for the application that will be covered by the ES are:

- Landscape and Visual Impact (incorporating living conditions of nearby occupiers),
- Ecology,
- Ornithology,
- Historic Environment,
- Noise,
- Traffic and Transport and;
- Cumulative Impact.

With regard to the content of the ES, the Applicant had previously proposed to scope out Health and Safety and Risks to Human Health from the ES. The Pre- Application advice request does not list this aspect as part of the future ES chapters. The Applicant is therefore reminded that the SD confirms that these matters cannot be scoped out based on the limited information provided at this stage.

It is noted that the Applicant intends to incorporate information on the Planning Policy framework into the ES. However, as per section 6 of the Inspectorate's SD, the ES should focus on describing and quantifying environmental effects rather than dealing with policy arguments / justifications. The ES should not constitute an advocacy document for the scheme. The Inspectorate therefore suggests that the Applicant produce a separate Planning Statement which draws together their main planning policy arguments into a single coherent document and also covers those issues that are unlikely to constitute main issues and do not require standalone reports, but will nonetheless form part of the Inspector's consideration. A Planning Statement should also include the Applicant's assessment of the planning merits of the scheme, its compliance with national and local policy and the Applicant's suggested conditions, particularly where they have been able to achieve agreement with the Local Planning Authority (LPA) on such matters.

The Applicant may also want to consider expressing how they consider a grant of planning permission for this proposal would comply with the Well-being Goals set out in the [Well-being of Future Generations \(Wales\) Act 2015](#).

The application must be accompanied by a Design and Access Statement which sets out the design principles and process that have been applied to the scheme and how issues around access have been considered.

Where secondary consents are being sought (see below) the Applicant will need to produce a written statement that sets out the consents being applied for and their arguments in support.

In all cases, assessments and information produced to support the application should provide a clear outline of the basis on which the scheme has been assessed and for which consent is sought.

#### *Habitats Regulations Assessment*

Due to the application site's proximity and potential relationship to European Protected Sites (effects on the River Wye SAC and in particular the likelihood of a functional linkage to the Elenydd-Mallaen SPA as noted by NRW and in the SD), it will be necessary for the

appointed Inspector to make a recommendation to the Welsh Ministers, as the competent authority, on the issue of screening and appropriate assessment (AA) under the Conservation of Habitats and Species Regulations 2017. The Ministers will have to come to their own conclusion and it would therefore be beneficial to the DNS application process if the Applicant were to prepare a shadow screening report setting out their view of whether the proposal requires an AA, based on up-to-date information. If the Applicant's view is that AA is required, they should produce a shadow AA to inform the Inspector's recommendation. Doing so will ensure that the Inspector has the required information on hand and help to avoid unnecessary delay. The Inspectorate's guidance for Nationally Significant Infrastructure Projects – [Advice Note 10: Habitat Regulations Assessment relevant to Nationally Significant Infrastructure Projects](#) may prove useful when considering what information to provide to allow the Welsh Ministers to undertake AA.

### ***Documents required for the application to be valid***

The statutory requirements for a valid application are set out at Article 12 of the Order.

The Welsh Ministers have the power to specify whether any additional information should be provided (normally the LPA under S62(3) of the 1990 Act, but for DNS applications, that power belongs to the Welsh Ministers, as indicated by Article 12(1)(vii) of the Order).

This provision allows non-standard information to be specified as a validation requirement for a development if the Welsh Ministers publish it as such on their website. However, based on the information provided, it is not considered likely that information over and above that set out at Article 12 would be required for the purposes of validation in this instance. Further information and advice on the format of submissions and the validation process can be obtained from the Planning Inspectorate's Casework Team and does not attract a charge. A copy of the Planning Inspectorate's internal checklist for validation, which is based on Article 12, is attached as an aid to the Applicant.

Please refer to the advice regarding planning obligations, suggested conditions and Statements of Common Ground within our main Procedural Guidance for the DNS system.

## **4. Outline of the Relevant Policy Framework**

The local policy framework is covered by the LPA's statutory pre-application advice duties under Regulation 7 of the Developments of National Significance (Wales) Regulations 2016. The Applicant may therefore also wish to seek advice from the LPA on this aspect, as it will likely be able to provide a more comprehensive view of the relevant local policies. The policies outlined below are considered potentially relevant to the development as described, dependant on the final form of the application submission. The relevance of individual policies to the overall planning balance will vary based on the appointed Inspector's final identification of the main issues.

This advice is based on the versions of documents that are current at the time of writing. The Applicant should be aware that changes in policy may occur prior to the determination of any subsequent application.

***The emerging Future Wales - The National Plan 2040 (formerly the National Development Framework)***

As noted by the Applicant, the Welsh Government (WG) is currently working on production of a National Development Framework (NDF), a consultation draft of which was published in 2019. The Draft NDF set out Priority Areas for wind farm and solar development, within which there would be clear policy support for such schemes, a presumption in favour of those types of development and an acceptance of landscape change.

Outside of priority areas, the Draft NDF would not carry explicit policy support, but schemes would be considered on their own merits in the usual way.

It is noted that the southern parcel of the proposed application site would fall partially within one of the identified Priority Areas. Were the NDF to be brought forward in the same form as the consultation draft, then there would be explicit policy support for those parts of the scheme located within the Priority Area. However, the WG has stated that it proposes to make changes to the NDF following the consultation and the comments received.

Moreover, the Minister for Housing and Local Government [announced on 15 July 2020](#) that the timetable for Senedd scrutiny and publication of the final NDF has slipped due to the ongoing Covid-19 pandemic. The WG now intends to lay the draft NDF with the Senedd to scrutinise proposed changes in September 2020, with publication of the NDF to follow early in 2021, though Covid-19 continues to make timescales uncertain. As such, at this stage it is not possible to conclude what the status or content of the NDF will be at the time the application is made. It is recommended that the Applicant continue to follow updates from the WG as the situation progresses. The name of the NDF has been changed to 'Future Wales - The National Plan 2040'.

***Building Better Places – The Planning System Delivering Resilient and Brighter Futures***

The Applicant's attention is drawn to the WG's recently published document '[Building Better Places – The Planning System Delivering Resilient and Brighter Futures](#)' (2020), which sets out its priorities for the planning system following the Covid-19 pandemic and discusses how they relate to policy contained in Planning Policy Wales Edition 10.

***Relevant National Planning Policy***

*Planning Policy Wales – Edition 10 (PPW), in particular:*

Chapter 3 – Strategic and Spatial Choices

Chapter 5 – Productive and Enterprising Places

Chapter 6 - Distinctive and Natural Places

***Technical Advice Notes***

TAN 5: Nature Conservation and Planning

TAN 8: Renewable Energy

TAN 11: Noise

TAN 12: Design

TAN 15: Development and Flood Risk

TAN 18: Transport



TAN 24: The Historic Environment

***Relevant Local Planning Policy***

*Powys Local Development Plan 2011 – 2026*

Policy DM2 – The Natural Environment;

Policy DM4 – Landscape;

Policy DM5 – Development and Flood Risk;

Policy DM6 – Flood Prevention Measures and Land Drainage;

Policy DM13 – Design and Resources; and

Policy RE1 – Renewable Energy.

*Supplementary Planning Guidance*

Renewable Energy SPG

Landscape SPG

Biodiversity and Geodiversity SPG

**5. Overall assessment of the proposal and a view of its merits**

Based on the information provided, I consider that there is no obvious policy objection to the principle of the development proposed at this location; both PPW and the draft National Plan are supportive of renewable energy projects where appropriate. The site lies close to a Strategic Search Area (TAN 8) and Policy RE1 of the LDP is supportive of wind development is those locations, subject to compliance with the other policies of the LDP and where any required mitigation can be secured. As noted above and although subject to potential change, the site is also partially within a Priority Area in the draft National Plan. It is considered that the nature, scale and location of the development do not conflict with the aims of the national and local policy in this respect.

The acceptability of the proposal will therefore rest on the potential harm that could arise from the scheme and its compatibility with other relevant planning policy. As described above, there are a number of issues that would need to be addressed and satisfactorily resolved, in particular Landscape and Visual Impact (incorporating living conditions of nearby occupiers), Ecology, Ornithology, Historic Environment, Noise, Traffic and Transport and Cumulative Impact. These issues will ultimately turn on more detailed site-specific information that is not yet available.

Nonetheless, from the documents submitted for the purposes of this request, there is nothing in the information currently available that definitely suggests the issues described above could not be satisfactorily addressed through appropriate consultation, survey work, mitigation measures (if and where appropriate) and the imposition of appropriate planning conditions. There is some potential benefit from the scheme in terms of its ability to provide significant amounts of renewable energy, contribute towards greenhouse gas reduction targets set out in the Environment (Wales) Act 2016 and provide balancing capability to the National Grid through the use of energy storage. Provided the Applicant is able to show through evidence that there would be no unacceptable harm, it is considered that the scheme as proposed could be recommended for a grant of planning permission.

## 6. Requirement for secondary consents

It is not possible or appropriate for the Planning Inspectorate to identify what secondary consents may be required for a particular DNS. The Applicant will ultimately need to satisfy themselves that they have obtained the necessary consents required for the scheme proposed and the following comments should be read with this in mind.

As noted by the Applicant, there are public footpaths and bridleways crossing parts of the site and as such, there is a potential for those routes to be directly affected depending on the final layout of the scheme and any subsequent construction requirements. Orders for the stopping up or diversion of public Footpaths and bridleways to accommodate development fall under Section 247 of the 1990 Act and are therefore a prescribed secondary consent which could be sought through the DNS process. However, without a final scheme layout it is not possible to confirm at this stage whether any of the footpaths or bridleways would need to be extinguished or rerouted and therefore whether such Orders would be required. The Applicant will need to establish this for in due course and factor it into their overall consenting strategy. It should be noted that details of any secondary consents being sought will need to be provided at the point of notification.

From the information provided, it appears that the site boundary has been designed to avoid areas of Registered Common Land and that consent under the Commons Act 2006 would therefore not be required. It is recommended that the Applicant should nonetheless conduct a thorough search of the Commons Register to ensure that this is the case.

It does not appear that any of the other secondary consents set out in the Schedule to the Developments of National Significance (Specified Criteria and Prescribed Secondary Consents) (Wales) Regulations 2016 (as amended) would be required for the development proposed.

Whilst a separate legislative requirement from planning permission, and not a prescribed secondary consent in the DNS regime, the Applicant's attention is drawn to the statutory SuDS regime that came into force in Wales in January 2019. The requirement to obtain SuDS consent prior to construction may require iterative design changes that influence the scheme that is taken through to application. As such, it is recommended that the Applicant contact the local SuDS Approval Body early on.

## 7. Local Ownership

The WG's Policy Statement '[Local ownership of energy generation in Wales – benefitting Wales today and for future generations](#)' (2020) sets out its approach and expectations relating to local ownership of renewable energy schemes. However, there is no planning policy requirement for renewable energy schemes to include local ownership and as the above Policy Statement makes clear at section 6, decisions must be based on an assessment of the impacts of the development. It is an established principle that land ownership is not a material consideration when considering the grant of planning permission.

Whilst the Planning Inspectorate would encourage ongoing dialogue with stakeholders if the Applicant intends to bring forward a degree of local ownership, as there is no requirement for them to do so, we cannot offer any further advice on what model or range of models would be most appropriate, other than to say that it is likely that the level of weight that could be afforded is likely to be affected by whether such benefits can be shown to be deliverable and securable. Ultimately it would be for the Applicant to decide

how best to put forward the information they would want to be taken into consideration by the appointed Inspector and the Welsh Ministers.

There is no requirement for DNS applications to be accompanied by a Collaborative Benefits Report in order to be valid. However, if the Applicant wishes to address community ownership in their submission to the Welsh Ministers, the Inspectorate recommends that this is done in the form of a stand-alone document, which could be cross-referenced to the ES and / or Planning Statement as necessary.

The Applicant is advised to contact WG's Energy Policy Team for further information and updates on the position on Local Ownership.

**ANNEX – Planning Inspectorate Validation Checklist**

<b>DNS APPLICATION CHECK LIST</b>		✓
<b>General Requirements</b>		
<b>1</b>	DNS application form completed.	
<b>2</b>	Submitting within 12 months of the notice of acceptance of a proposed application.	
<b>3</b>	Submitted a copy of the notice of acceptance letter.	
<b>4</b>	Submitted a site location plan.	
<b>5</b>	Submitted all other plans applicable to the development.	
<b>6</b>	Plans drawn to a scale and in the direction of north.	
<b>7</b>	Served notice on any other land owners.	
<b>8</b>	If yes to above, submitted a copy of the certificate(s) serving notice on other owners.	
<b>9</b>	Submitted an Environmental Statement (ES).	
<b>10</b>	If yes to the above, the ES has been assessed and meets the minimum requirements of the EIA regulations.	
<b>11</b>	Submitted a written statement about any secondary consents connected with the application.	
<b>12</b>	Served a copy of the application on the Local Planning Authority.	
<b>13</b>	Paid the fee.	
<b>14</b>	Submitted Design and Access Statement if required.	
<b>15</b>	If the application involves Crown Land - statement in respect of Crown Land submitted.	
<b>16</b>	If the application submitted by a person authorised to do so for Crown Land - copy of the authorisation submitted?	
<b>Publicity and Consultation</b>		
<b>17</b>	Submitted the pre-application consultation report.	
<b>18</b>	Displayed a notice in at least 1 place on or near the site for not less than 42 days.	
<b>19</b>	Written to any owners/occupiers of any land adjoining the site.	
<b>20</b>	Issued a notice in a local newspaper.	
<b>21</b>	Published the application, and supporting documents on a website for a period of not less than 42 days.	
<b>22</b>	Consulted relevant community & specialist consultees.	
<b>23</b>	If applying for a Secondary consent - Consulted relevant person/body who would have been responsible for the Secondary Consent application had it not been part of the DNS.	



The Planning Inspectorate  
Yr Arolygiaeth Gynllunio

# DNS Pre-application Advice

## 3244499: Garn Fach Windfarm

10 March 2021  
Prepared by Christopher Sweet MPlan

**This advice should be read in conjunction with the Planning Inspectorate's procedural guidance on Developments of National Significance. Advice is provided following a request submitted by the applicants on 24 February 2021. The advice is not binding and does not prejudice the Inspectorate's processing of the application if submitted, any recommendation made by an Inspector or any decision made by the Welsh Ministers in relation to a development of this nature on this site.**

## Requested Advice

The written request identified the following matters:

1. confirmation of the Applicants' proposed approach to the assessment of the impacts of the proposed development on tourism, as agreed with Powys County Council (PCC),
2. a request for confirmation of the acceptability of the applicants' proposed approach to the assessment of the grid connection of the project; and
3. details of the proposed approach to securing SAB consent in connection with the DNS application (as agreed with PCC).

## Planning Inspectorate Response

### **The approach to the assessment of the impacts of the proposed development on tourism.**

As noted by the applicants, the Inspectorate did not require impacts on tourism to be scoped into the Environmental Statement (ES) in its scoping direction. It remains the Inspectorate's position that those issues do not require a standalone chapter in the ES, but the approach outlined by the applicant and agreed with PCC is considered pragmatic and is therefore acknowledged. The proposed approach does not present any issues that the Inspectorate would wish to raise at this stage.

### **The approach to the assessment of the grid connection.**

The approach outlined in the applicants' request is considered proportionate and generally appropriate. Focussing the high level assessment of the potential grid connection on those issues most likely to result in significant effects (biodiversity, landscape and cultural heritage) is considered pragmatic, but the applicant should not discount reference to other potential impacts if and where assessment identifies potential for significant effects.

### **The need for SAB approval**

The applicants' request for an informative regarding SAB consent to be included with the decision on the DNS application is noted. However, the content of the decision itself would be a matter for the Welsh Ministers and as such, the Inspectorate is not in a position to agree to any particular content being included.

Notwithstanding the above, the Inspectorate's view is that as SAB consent is a requirement of separate legislation, the approach to obtaining the necessary consents and the timing of any applications is a matter for the applicants' judgement based on the circumstances of the scheme. The difficulties around obtaining SAB consent at an early stage and then being faced with the need for minor changes later on is acknowledged. However, were an informative regarding SAB consent to be included on a planning permission, it would not have any legal force and would not serve any purpose other than to draw the applicants' attention to the requirement for SAB consent, which in the Inspectorate's view is unnecessary in this instance.

**APPENDIX D**  
**POWYS COUNTY COUNCIL DNS**  
**PRE- APPLICATION RESPONSE**  
(dated 4th November 2020)





Barton Willmore  
Mr Ben Lewis  
Greyfriars House  
Greyfriars Place  
Cardiff  
CF10 3AL

**Gwilym Davies**

Head of Property, Planning and Public  
Protection

County Hall  
Spa Road East  
Llandrindod Wells  
LD1 5LG

**Our Ref:** 20/00001/DNSPRE

**Date:** 4 November 2020

Dear Sir/Madam,

Reference: 20/00001/DNSPRE

Proposal: Proposed onshore wind generating station with an installed generating capacity of up to 110MW, together with energy storage, and associated equipment, infrastructure and ancillary works

Site Address: Land At Garn Fach, Powys, ,

**Powys Local Development Plan 2018**

Strategic Policy SP7 – Safeguarding of Strategic Resources and Assets

Policy DM2 – The Natural Environment

Policy DM4 – Landscape

Policy DM6 – Flood Prevention Measures and Land Drainage

Policy DM10 – Contaminated and Unstable Land

Policy DM13 – Design and Resources

Policy T1 – Travel, Traffic and Transport Infrastructure

Policy RE1 – Renewable Energy

Powys SPG – Renewable Energy

Powys SPG – Landscape

**National Planning Policy**

Relevant national planning policy is not part of the development plan, but is an important material consideration. The relevant national planning policies for wind farm developments are set out in:

- Planning Policy Wales Edition 10 (2018);
- Technical Advice Note 5 (TAN5): Nature Conservation and Planning (2009);

- Technical Advice Note 6 (TAN6): Planning for Sustainable Rural Communities (2010);
- Technical Advice Note 8 (TAN8): Planning for Renewable Energy (2005);
- Technical Advice Note 11 (TAN11): Noise (1997);
- Technical Advice Note 12 (TAN12): Design (2014);
- Technical Advice Note 23 (TAN23): Economic Development (2014);
- Technical Advice Note 24 (TAN24): The Historic Environment (2017); and
- Building Better Places: The Planning System Delivering Resilient and Brighter Futures – Placemaking and the Covid-19 Recovery (2020)

Planning Policy Wales (PPW - 2018) is the principal national planning policy for Wales. PPW sets out the land use planning policies of the Welsh Government. Together with the series of Technical Advice Notes (TANs) and policy clarification letters it comprises national planning policy. Section 5.9 deals with renewable and low carbon energy.

PPW confirms that Planning authorities should plan positively for the use of locally generated electricity and heat to help meet the national target of one Gigawatt by 2030. Para 5.9.17 states that Planning authorities should give significant weight to the Welsh Government's targets to increase renewable and low carbon energy generation, as part of our overall approach to tackling climate change and increasing energy security.

Technical Advice Notes (TANs) should be read in conjunction with 'Planning Guidance (Wales): Planning Policy'. Planning Guidance, Technical Advice Notes and circulars should be taken into account by local planning authorities in Wales in the preparation of development plans. They may be material to decisions on individual planning applications.

TAN5: Nature Conservation and Planning (2009) was published in September 2009 and provides supplementary advice to the policies set out within PPW with respect of nature conservation issues and planning. TAN5 provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation.

TAN 5 sets out the criteria for which development proposals will be judged with regard to sustainable development, protection and improvement of the environment, ensure appropriate weight is attached to designated sites of international, national and local importance, protect wildlife and natural features and adopt a step-wise approach to avoid harm to nature conservation.

The focus of TAN6: Planning for Sustainable Rural Communities (2010) is to provide practical guidance on how the planning system can support sustainable rural communities. TAN6 states that the quality of the agricultural land should be considered when determining planning applications.

TAN6 recognises that the planning system must respond to the challenges posed by climate change, for example by accommodating the need for renewable energy

generation. However local planning authorities should also ensure local communities are not negatively affected, protect and enhance the natural and historic environment and safeguard the countryside and open spaces.

TAN8 sets out the Welsh Government's target of 4TWh of electricity per annum to be produced by renewable energy by 2010 and 7TWh by 2020.

TAN11: Noise (1997) sets out how the planning system can be used to minimise the adverse impact of noise without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens of business. It outlines some of the main considerations which local planning authorities should take into account in drawing-up development plan policies and when determining planning applications for development which will either generate noise or be exposed to existing noise sources.

TAN11 states (at para. 8) that:

*'Local planning authorities should ensure that noise generating development does not cause an unacceptable degree of disturbance. They should also bear in mind that if subsequent intensification or change of use results in greater intrusion, consideration should be given to the use of appropriate conditions.'*

The purpose of TAN12: Design (2014) is to equip all those involved in the design of development with advice on promoting sustainability through good design, planning sustainable developments and design and access statements.

TAN13: Tourism (1997) focuses on promoting and developing tourism in Wales.

TAN15: Development and Flood Risk (2004) advises on development and flood risk as this relates to sustainability principles (section 2.2 PPW), and provides a framework within which risks arising from both river and coastal flooding, and from additional run-off from development in any location, can be assessed.

TAN18: Transport (2007) focuses on the importance of transport to sustainability. Para. 3.11 reiterates this principle stating that: *'Development in rural locations should embody sustainability principles, balancing the need to support the rural economy, whilst maintaining and enhancing the environmental, social and cultural quality of rural areas.'*

## **Emerging policy**

The Welsh Government National Development Framework has been out to consultation and is currently awaiting Senedd in February 2021. The NDF has policies which support the development of renewable energy and identify areas within Wales where wind schemes are acceptable. It would appear from the working draft NDF that the site would fall within the area numbered 4 for wind development and as such may be deemed acceptable in national policy. This document is however in draft and is subject to change.

## **Proposed development**

The site is located in an area of open countryside approximately 2km to the west of Llaithddu, 5km to the north of Llanbadarn Fynydd and approximately 8km to the south of Newtown.

The submission seeks pre-application advice on the development of a 110 MW onshore wind generating station comprising the following;

- Up to 22 turbines with a blade tip height of 149.9 metres
- Turbine foundations
- Crane hardstanding for each turbine
- Low to medium voltage external transformers for each turbine
- On-site tracks
- Buried electrical cables
- Substation compound
- Up to 2 freestanding meteorological masts
- Borrow pits (for the extraction of stone); and
- Temporary construction compounds.

The site was part of a previous application and appeal that was refused and no wind turbines are proposed within the area of the site identified in the previous appeal decision as 'the southern group of turbines'.

## **Climate change & Principle of Development**

The Intergovernmental Panel on Climate Change (IPCC) stated in 2014 that 'warming of the climate system is unequivocal, and since the 1950s, many of the observed changes are unprecedented over decades to millennia. The atmosphere and ocean have warmed, the amounts of snow and ice have diminished, and sea level has risen'.

The Climate Change Act established a target for the UK to reduce its emissions and Wales strengthened its legislative framework to reduce greenhouse gas emissions through the Environment (Wales) Act 2016. The Act sets a legal target of reducing emissions by a minimum of 80% by 2050. The Welsh Government has also accepted the Climate Change Commissions recommendation to increase the target to 95% and announced an ambition to bring forward a net zero target no later than 2050. The Act established a system of five-yearly carbon budgets, to incrementally achieve this reduction. The interim emissions targets have been set for 2020, 2030 and 2040. The first carbon budget is 2016-2020 and subsequent budgets will run until 2050. For the 2020 interim target a reduction of 27% is being aimed for.

To help achieve the above, in recent years there has been a push to increase the proportion of energy generated from renewable sources across Wales. These have

been supported in a number of ways including direct financial aid (such as subsidies) and planning policy. Planning policy is clear that there is a need to move towards renewable energy sources to combat climate change.

Whilst the need for the development is accepted, the contribution the scheme makes towards meeting that need is material and should be weighed in the planning balance.

The proposed development would potentially generate up to 110MW with an energy storage capacity of up to 50MW.

The proposed development will provide clean renewable energy and reduce carbon emissions and this is to be given significant weight within the planning balance.

Para 5.9.17 of Planning Policy Wales states that Planning authorities should give significant weight to the Welsh Government's targets to increase renewable and low carbon energy generation, as part of our overall approach to tackling climate change and increasing energy security.

In terms of more up to date guidance Welsh Government Released Building Better Places; The Planning System Delivering Resilient and Brighter Futures – Placemaking and the Covid-10 Recovery which reaffirms the need to move towards low carbon technologies. The document produced in June 2020 states that the key message is that a plan-led approach is the most effective way for the planning system to combat climate change. We must identify, plan for and achieve key steps in achieving the switch to a decarbonised and climate resilient society

Policy RE1 of the Powys Local Development Plan states the following;

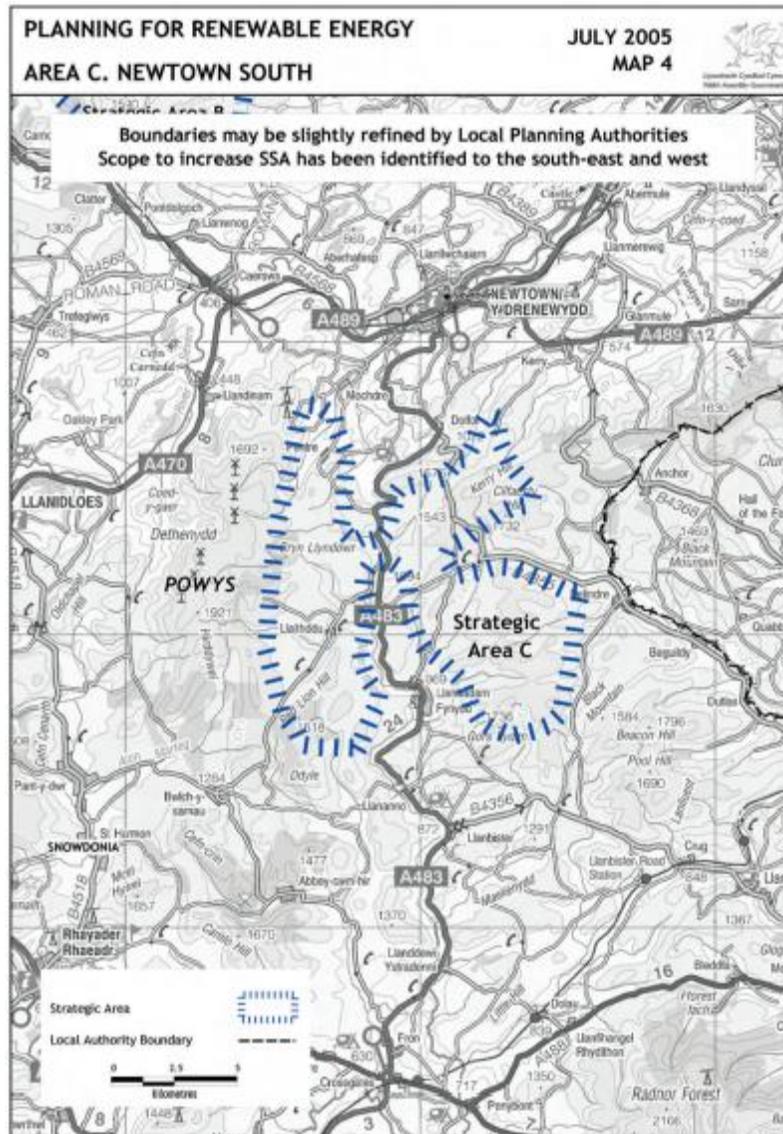
Proposals for renewable and low carbon energy development will be permitted subject to the following criteria:

1. Within or close to the Strategic Search Areas (SSAs), proposals for wind energy greater than 25MW will be permitted subject to criteria 3 to 5; all other proposals for renewable and low carbon energy will only be permitted where they can demonstrate they would not prejudice the purpose of the SSA.
2. Within the Local Search Areas (LSAs), proposals for solar PV between 5 – 50MW will be permitted subject to criteria 3 to 5; all other proposals for renewable and low carbon energy will only be permitted where they can demonstrate they would not prejudice the purpose of the LSA.
3. Proposals for all types of renewable and low carbon energy development and associated infrastructure either on their own, cumulatively or in combination with existing, approved or proposed development, shall comply with all other relevant policies in the LDP.

4. Satisfactory mitigation shall be in place to reduce the impact of the proposal and its associated infrastructure. Proposals shall make provision for the restoration and after-care of the land for its beneficial re-use.

5. Where necessary, additional compensatory benefits will be sought by agreement with applicants in accordance with Policy DM1 - Planning Obligations.

The proposed development appears to lie within and adjoining the SSA C as defined by TAN 8, see extract from TAN below.



As such the development of a wind farm of this scale would be, in principle, subject to demonstrating that the purpose of the SSA is not prejudiced and that criterion 3 – 5 of the above policy are considered and are found to be acceptable.



landscapes (National Parks and Areas of Outstanding Natural Beauty) and the visual amenity enjoyed by users of both Powys landscapes and adjoining areas.

Proposals which are likely to have a significant impact on the landscape and/or visual amenity will require a Landscape and Visual Impact Assessment to be undertaken.

Policy SP7 – Safeguarding of Strategic Resources and Assets states that development proposals must not have an unacceptable adverse impact on the resource or assets and its operation. A list of strategic resources and assets has been provided within the policy which include, National Parks, Listed Buildings, Scheduled Monuments, Rights of Way and the valued characteristics and qualities of the landscape throughout Powys.

A Landscape and Visual Impact Assessment (including consideration of LANDMAP) should form part of any future Environmental Statement and should also include a cumulative assessment. A review of the draft ES chapter on landscape was undertaken at Scoping stage and the landscape consultants' comments are attached to the pre-application for ease of reference.

Developments such as this can have significant landscape impacts. Additional viewpoints to that provided in the scoping have been suggested by the landscape consultant and we would be happy to discuss this further.

Planning Policy Wales Edition 10 states that in circumstances where protected landscape, biodiversity and historical designations and buildings are considered in the decision making process, only the direct irreversible impacts on statutorily protected sites and buildings and their settings (where appropriate) should be considered. In all cases, considerable weight should be attached to the need to produce more energy from renewable and low carbon sources, in order for Wales to meet its carbon and renewable targets. As such, it is clear that considerable weight should be given to low carbon energy generation when dealing with potential impacts on landscape, designations and biodiversity.

A balance against the potential landscape effect of the development along with the benefits of the scheme in terms of renewable energy production needs to be made. Officers consider that the benefit of renewable energy production should be given considerable weight in the determination of any submission.

Policies to consider in the preparation of any further landscape work are Planning Policy Wales, policies SP7, RE1, DM4 and DM13 of the Powys Local Development Plan and the Powys SPG Renewable Energy and Landscape.

## **Residential Amenity**

Wind farm developments have the potential to impact on the amenity of nearby residential properties through noise and shadow flicker. Planning Policy Wales states



that Planning authorities should also identify and require suitable ways to avoid, mitigate or compensate adverse impacts of renewable and low carbon energy development. The construction, operation, decommissioning, remediation and aftercare of proposals should take into account the need to minimise impacts on local communities, such as from noise and air pollution, to safeguard quality of life for existing and future generations.

As such, any submission should deal with matters relating to residential amenity. In considering the scoping report suggestions were provided on information to be amended or provided for any future application. Attached is the response to the scoping. The LPA would be happy to discuss any future work to be undertaken to identify any sensitive receptors or potential impacts.

### **Cultural Heritage**

Policy SP7 of the Powys Local Development Plan lists a number of strategic resources and assets which should be protected against development which would harm them. Listed Buildings and Scheduled Monuments are listed within policy SP7 as such resources and assets. Technical Advice Note 24 also reaffirms the need to protect heritage assets and their setting.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that 'In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'. The Barnwell Manor case the Court of Appeal made it clear that in enacting s.66 (1), Parliament had intended that the desirability of preserving the settings of listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given "considerable importance and weight" when the decision-maker carried out the balancing exercise. Therefore special regard must be given to the desirability of preserving listed buildings and their setting and any harm caused should be given considerable weight within the planning balance.

A number of scheduled monuments and listed buildings are located surrounding the development site. A basic map detailing listed buildings (black dots) and Scheduled Monuments (light blue dots and hatched areas) is attached to this response.

A response from a heritage consultant was provided on the scoping report and is attached for reference. This provided information on what needed to be included in any future submission.

### **Highways / Transportation**

Policy T1 of the Powys LDP states the following;

Transport infrastructure, traffic management improvements and development proposals should incorporate the following principal requirements:

1. Safe and efficient flow of traffic for all transport users, including more vulnerable users, and especially those making 'Active Travel' journeys by walking or cycling;
2. Manage any impacts to the network and the local environment to acceptable levels and mitigate any adverse impacts; and,
3. Minimise demand for travel by private transport and encourage, promote and improve sustainable forms of travel including Active Travel opportunities in all areas.

Transport infrastructure improvements will be supported where they promote sustainable growth, maximise the efficiency and safety of the transport systems, improve public and private transport integration and encourage passenger and freight rail operations.

Any submission should demonstrate that the highway network can sufficiently accommodate the development and its associated construction. Consideration should be given to submitting an Access Management Plan or Construction Traffic Management Plan. Any submission should also provide information and plans for any localised widening or junction improvements that may be required as part of the development.

### **Public Rights of Way / Open Access Land**

Policy SP7 of the Powys Local Development Plan lists a number of strategic resources and assets which should be protected against development which would harm them. The Rights of Way network in Powys are listed within policy SP7 as such resources and assets.

Policy DM13 states the proposed developments will only be permitted where;

The public rights of way network or other recreation assets listed in Policy SP7 (3) are enhanced and integrated within the layout of the development proposal; or appropriate mitigation measures are put in place where necessary.

There are a number of public rights of way, including bridleways, near to and within the application site. The site is located on open access land, where the public have a right of access on foot for recreation; part of the site is located on registered common land, being part of MCL114. The northern edge of the site abuts registered common MCL101.

Changes to the surface, gradient and levels of the ground to construct tracks and turbine bases can have a significant impact on public rights of way. We will need detailed information about the turbine locations to assess whether they would be located on the public rights of way; if they are, a legal diversion of the affected path would be required. Micro-siting of 50 metres could bring a turbine close enough to a public right of way to be within the topple zone. In addition, any construction work on the

area of registered common land is highly likely to require separate common land consent.

At scoping stage Countryside Services advised that they would likely seek mitigation in the form of a financial contribution towards maintaining and improving the public rights of way near the development. Further discussion on this with Countryside Services is welcomed.

## **The Natural Environment**

LDP policy DM2 indicates that development proposals should demonstrate how they protect, positively manage and enhance biodiversity and geodiversity interests including improving the resilience of biodiversity through the enhanced connectivity of habitats within, and beyond the site. Proposals which unacceptably affect protected species or designated sites will not be supported. This is echoed within Technical Advice Note 5 and PPW.

The site is located within 10km of the following;

Sites of Special Scientific Interest;

- Cae Coed-Gleision SSSI
- Caeau Bryn-Du SSSI
- Caeau Cwm-Ffrwd SSSI
- Coed Mawr SSSI
- Coed Bryn-Person SSSI
- Coed Craig-Iar SSSI
- Coed Hafod-Fraith SSSI
- Cors Cae'r Neuadd SSSI
- Gweunydd Crychell SSSI
- Gwaun Cilgwyn SSSI
- Gweunydd Camnant SSSI
- Gweunydd Penstrowed SSSI
- Gweunydd Esgairdraenllwyn (Esgairdraenllwyn Pastures) SSSI
- Llymwynt Brook Pastures SSSI
- Mochdre Dingles SSSI
- Lower Caerfalog Pastures SSSI
- Rhosydd Nant-yr-Henfon SSSI
- Penstrowed Quarry SSSI
- Marcheini Uplands, Gilfach Farm & Gamallt SSSI
- Rhos Cwmdrwy SSSI
- Rhosydd Nant-yr-Henfron SSSI
- River Ithon SSSI
- River Teme SSSI

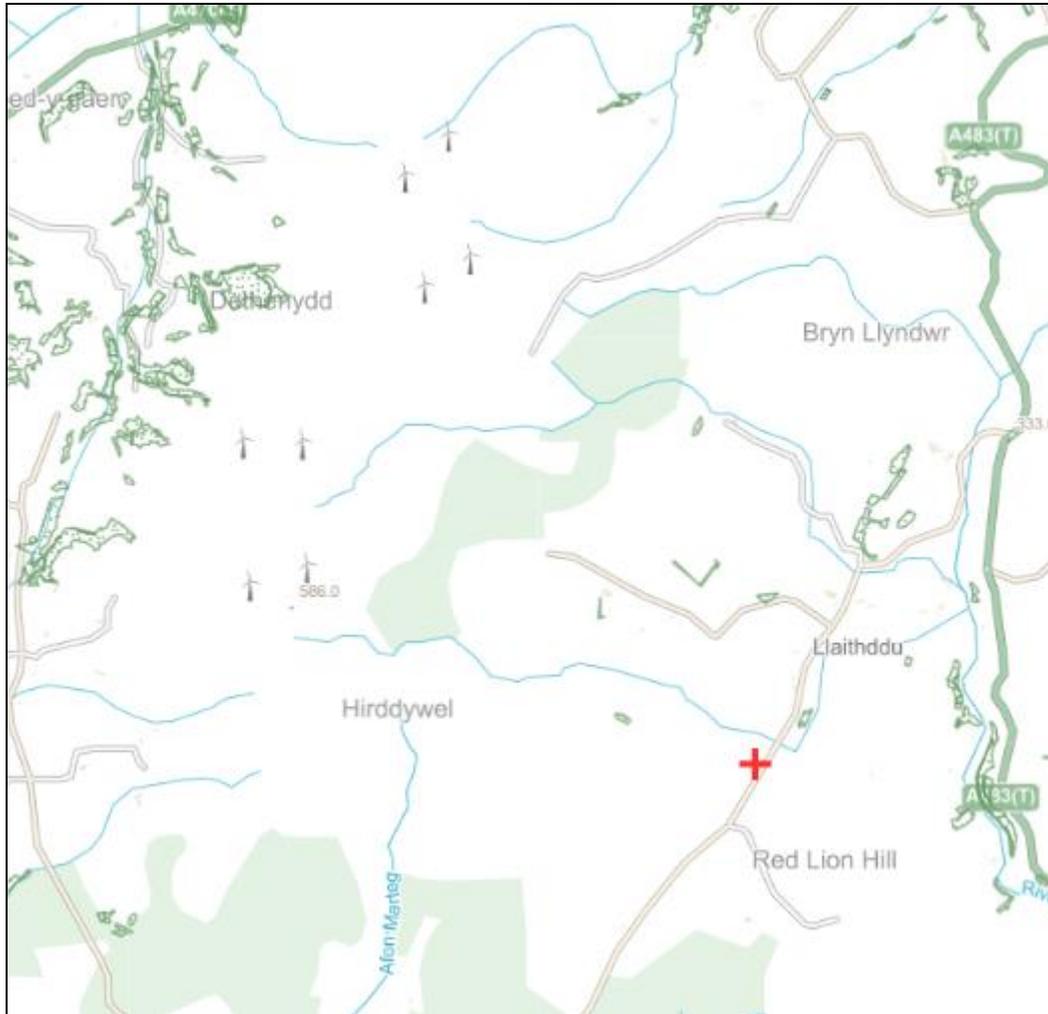
Special Areas of Conservation

- River Wye / Afon Gwyn (Wales) SAC

Special Protection Area

- Elenudd – Mallaen SPA

Other designations which will need to be considered in any submission are ancient woodland. See green hatched areas in map below



Any submission will need to include the proposed wind farm and ancillary and associated development in the consideration of biodiversity and ecology. This will ensure that indirect and cumulative impacts can be considered.

Due to the proximity to the site to the River Wye SAC it is likely that, in addition to the information required to support the Environmental Statement, that information to inform a Habitats Regulations Assessment will be required.

It is advised that we are awaiting information from Natural Resources Wales on recent evidence gathering they have undertaken on the River SACs in Wales. We are aware that it is likely they will be advising that the majority of River SACs in Wales are not meeting their targets with regards to phosphate levels, this includes the River Wye SAC. It is therefore strongly recommended that early engagement with NRW is undertaken to ensure that this does not detrimentally impact the progression of the application.

A response to the scoping was provided by the Powys Ecologist and is attached to this response. The information contained within their response should be considered in full prior to any submission being made. We are happy to discuss these matters further.

## **Conclusions**

The proposed development will introduce 110MW wind farm onto an area of open countryside. It will be present in views from the surrounding area, including residential dwellings, public rights of ways and highways.

The benefits of the scheme are given considerable weight; it will provide much needed clean energy generation helping to meet the Welsh Governments aspirations to increase renewable energy in Wales. In addition, it would bring some economic benefits to the area by way of construction employment and some ongoing employment for maintenance purposes.

It is therefore considered that the principle of development is acceptable.

Comments above are made with regards to landscape, cultural heritage, ecology and biodiversity and highways and should be considered in any future discussion.

We welcome further dialogue as the process moves forward and are happy to discuss these with relevant consultees and technical advisors.

Yours faithfully,



Tamsin Law  
Principal Planning Officer  
Powys County Council

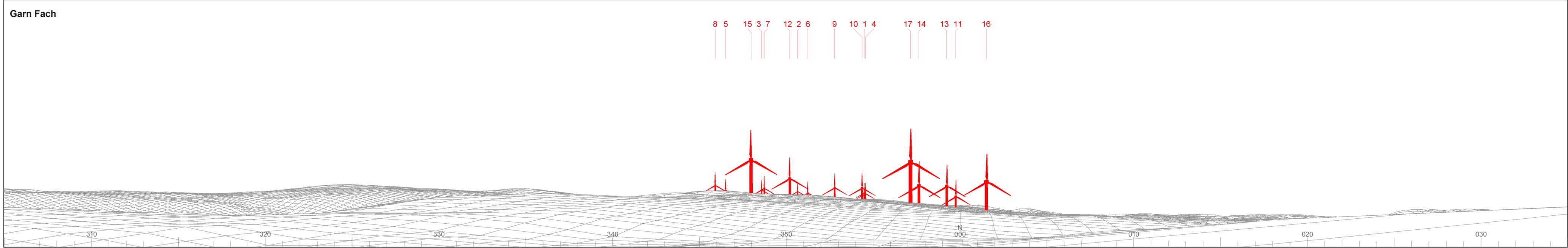
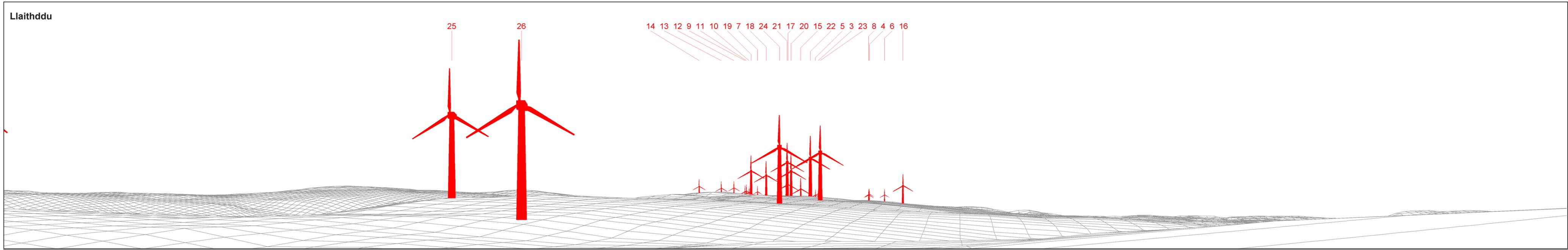
*Croesewir gohebiaeth yn y Gymraeg a'r Saesneg/Correspondence welcomed in Welsh and English*

### Data Protection and Privacy / Diogelu Data a Chyfrinachedd

In order to deliver the Planning Service (applications, complaints and appeals etc.) it is necessary for the council to process personal data, in accordance with relevant planning legislation, as listed on the Welsh Governments planning website (<https://gov.wales/topics/planning/?lang=en>). Information held by the Planning Service will be retained in accordance with the legislation and the Councils retention schedule. If you have any concerns regarding the use of your personal data please contact the Data Protection Officer by email at [REDACTED] or by phone at [REDACTED]. Please note that further information on the Data Protection and Privacy can be found at the following address: <https://en.powys.gov.uk/privacy>.

Er mwyn cyflawni ceisiadau, cwynion ac apeliadau'r Gwasanaeth Cynllunio mae angen i'r cyngor brosesu data personol yn unol â'r ddeddfwriaeth gynllunio berthnasol, sydd i'w weld ar wefan gynllunio Llywodraeth Cymru (<https://gov.wales/topics/planning/?skip=1&lang=cy>). Bydd y Gwasanaeth Cynllunio'n cadw Gwybodaeth yn unol â'r ddeddfwriaeth ac amserlen cadw'r Cyngor. Os oes gennych bryderon am sut rydym yn defnyddio'ch data personol cysylltwch â'r Swyddog Diogelu Data trwy e-bost [REDACTED] neu drwy ffonio [REDACTED] 0. Cofiwch y gallwch gael hyd i fwy o wybodaeth am Ddiogelu Data a Chyfrinachedd trwy fynd i: <https://cy.powys.gov.uk/article/653/Defnyddio-Cwcis>.

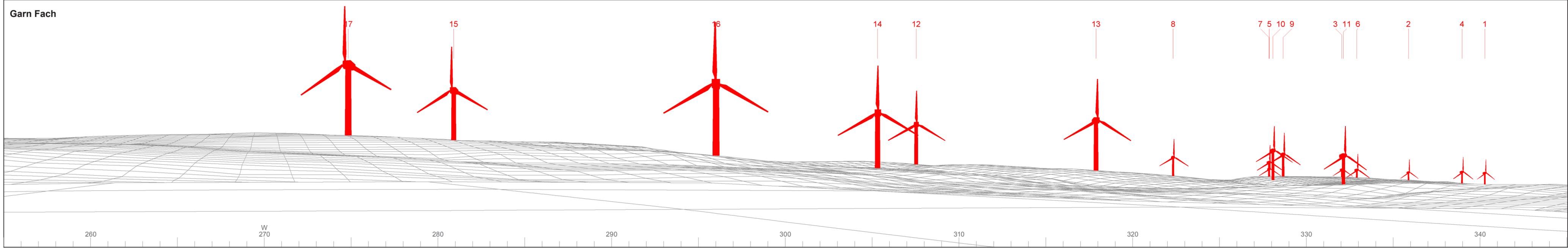
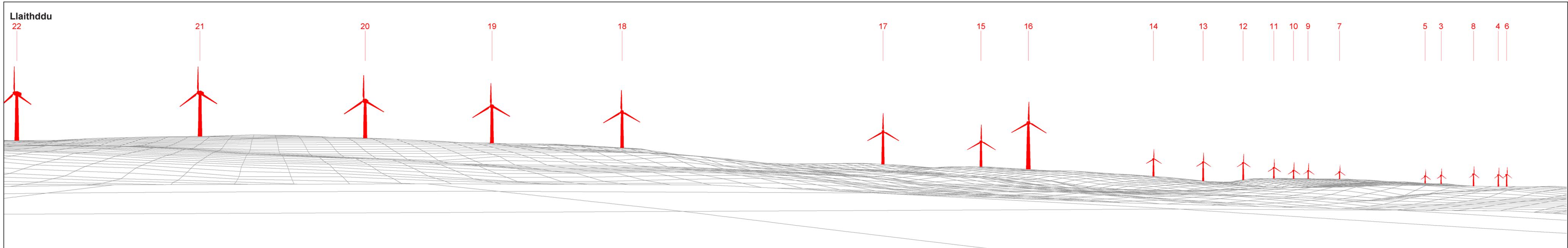
**APPENDIX E**  
**WIREFRAME COMPARISON OF GARN**  
**FACH AND LLAITHDDU WIND FARMS**



**Figure: 1**  
**VP2: Minor Road near Bwlch-y-Sarnau Hill**

OS reference:	304649E 276446N	Horizontal field of view:	90° (cylindrical projection)
AOD:	471m	Principal distance:	522 mm
Direction of View:	350°		

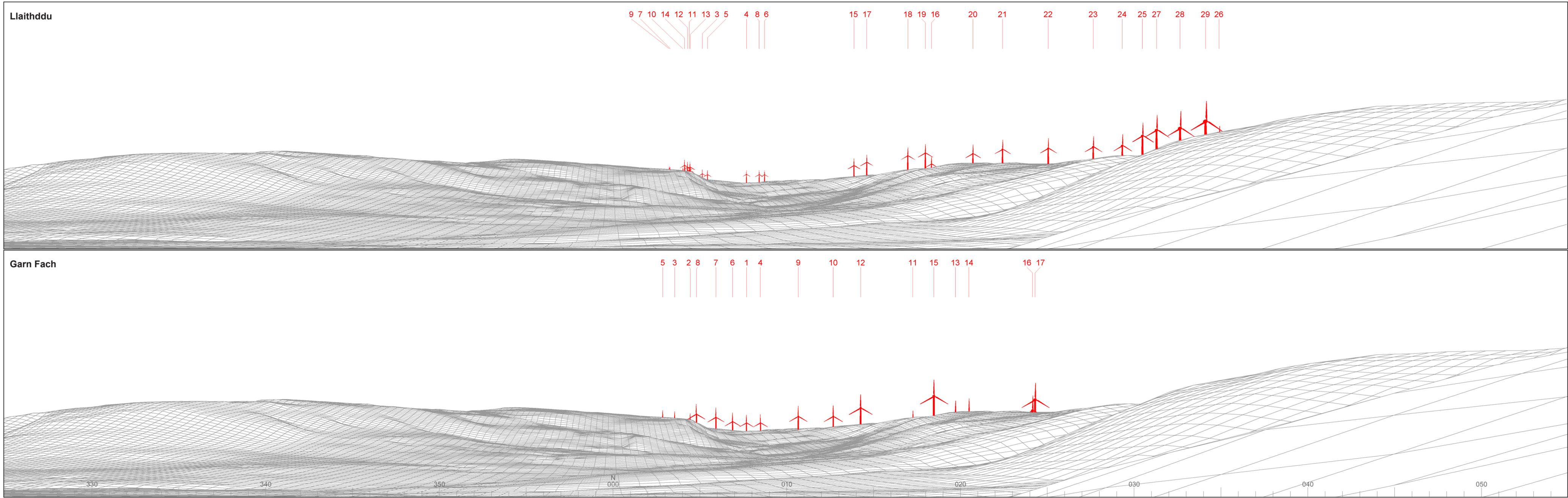




**Figure: 2**  
**VP3: Minor Road at David's Well**

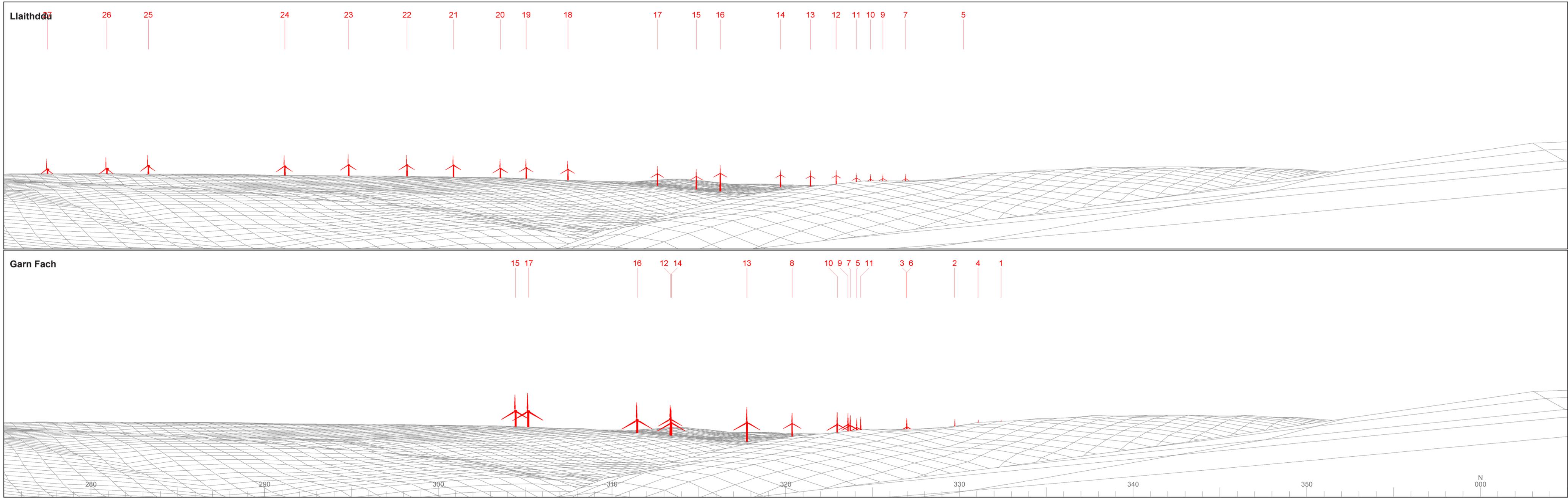
OS reference: 305704E 278337N  
 AOD: 396m  
 Direction of View: 300°

Horizontal field of view: 90° (cylindrical projection)  
 Principal distance: 522 mm



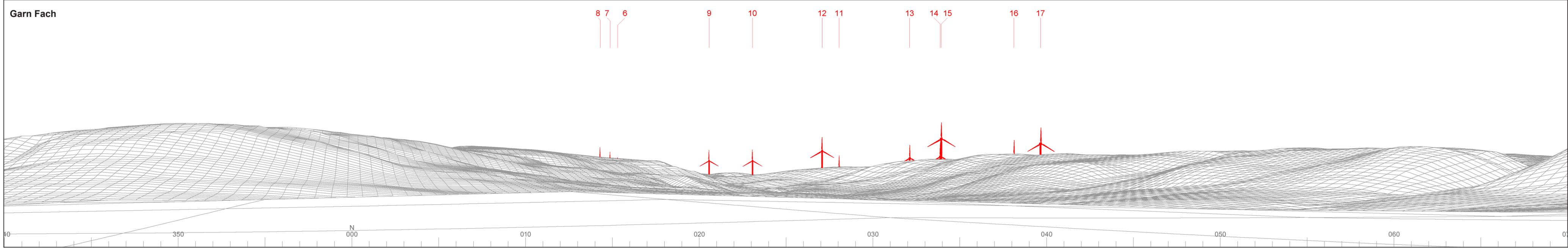
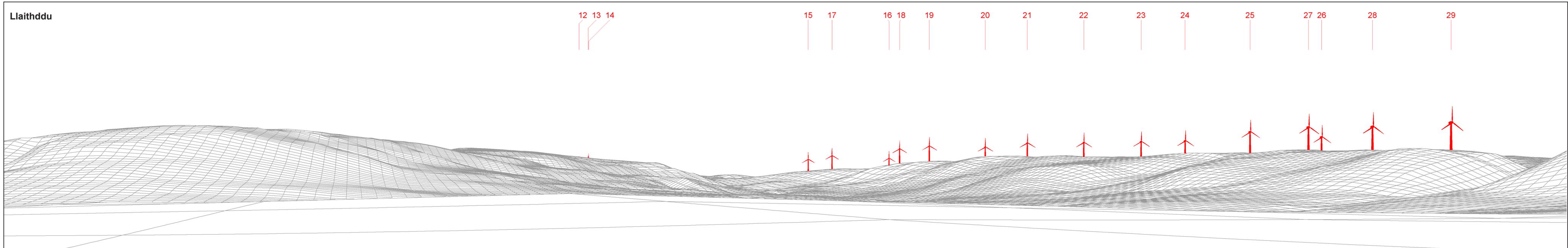
**Figure: 3**  
**VP4: Glyndŵr's Way, south of Bwlch-y-Sarnau**

OS reference:	302891E 274766N	Horizontal field of view:	90° (cylindrical projection)
AOD:	371m	Principal distance:	522 mm
Direction of View:	10°		



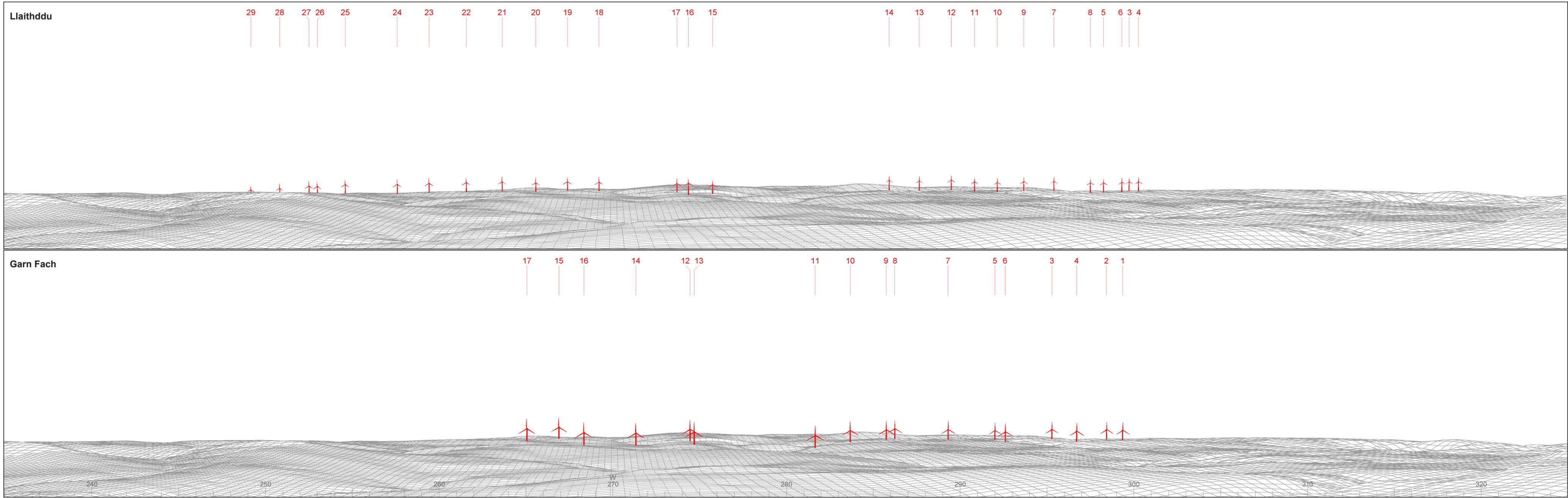
**Figure 4**  
**VP6: Glyndŵr's Way at Upper Lethr**

OS reference:	307518E 276343N	Horizontal field of view:	90° (cylindrical projection)
AOD:	431m	Principal distance:	522 mm
Direction of View:	320°		



**Figure: 5**  
**VP7: Minor Road West of Bwlch-y-Sarnau**

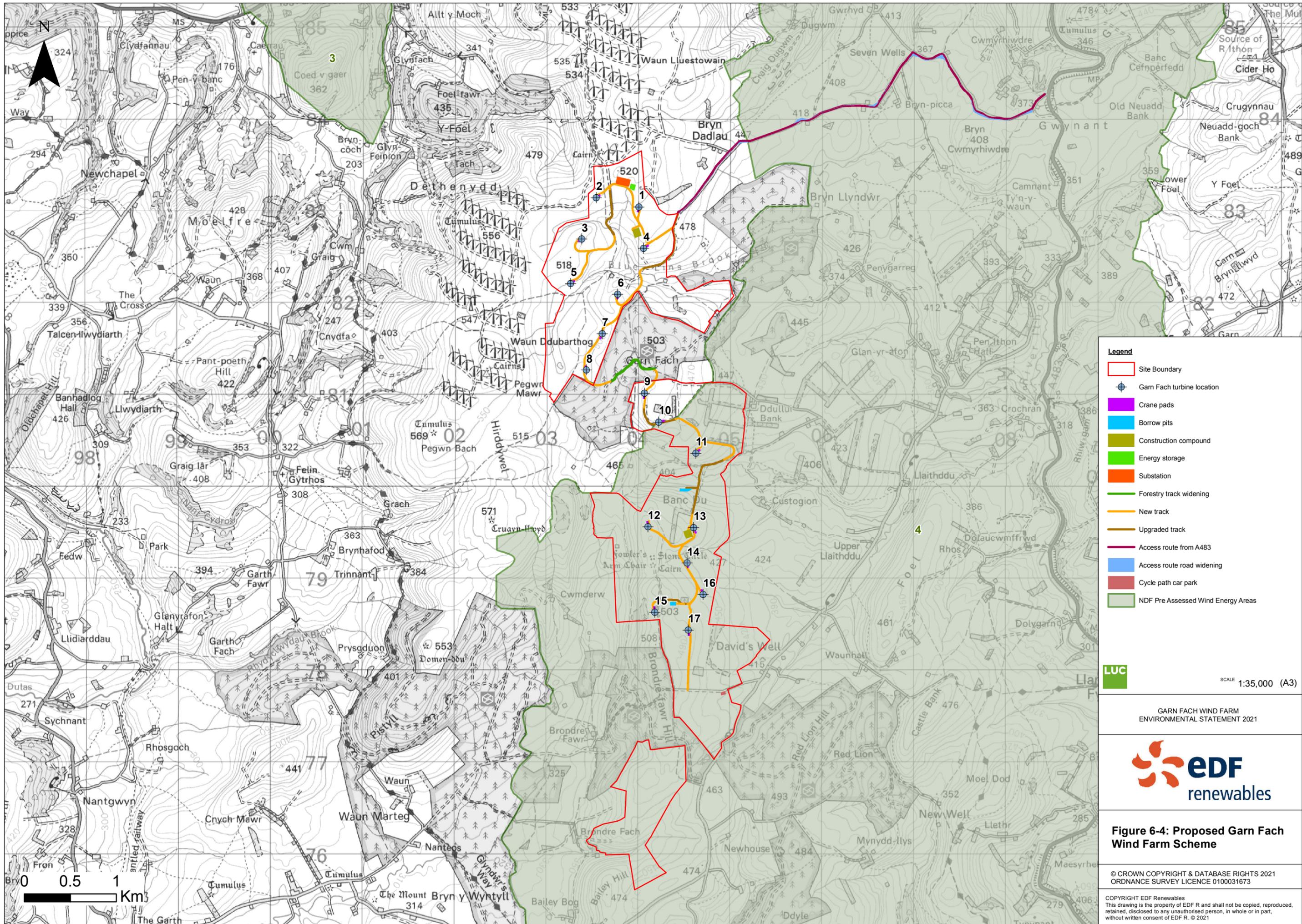
OS reference:	301907E 275245N	Horizontal field of view:	90° (cylindrical projection)
AOD:	337m	Principal distance:	522 mm
Direction of View:	25°		



**Figure: 6**  
**VP12: Glyndŵr's Way, Fron Top**

OS reference:	311182E 279003N	Horizontal field of view:	90° (cylindrical projection)
AOD:	453.156643 m	Principal distance:	522 mm
Direction of View:	280°		

**APPENDIX F**  
**PRE-ASSESSED AREAS FOR**  
**WIND ENERGY**  
(Figure 6.4 of the Environmental Statement)



- Legend**
- Site Boundary
  - ⊕ GARN FACH turbine location
  - Crane pads
  - Borrow pits
  - Construction compound
  - Energy storage
  - Substation
  - Forestry track widening
  - New track
  - Upgraded track
  - Access route from A483
  - Access route road widening
  - Cycle path car park
  - NDF Pre Assessed Wind Energy Areas

**LUC** SCALE 1:35,000 (A3)

GARN FACH WIND FARM ENVIRONMENTAL STATEMENT 2021



**Figure 6-4: Proposed GARN FACH Wind Farm Scheme**

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**APPENDIX G**  
**EXTRACT OF POWYS LDP PROPOSALS MAP**



