

Application Ref: NP/12/0133

Application Type	Full
Grid Ref:	SN17860820
Applicant	Mr R Lawrence
Agent	Mr P Morgan, MDA Consult Ltd
Proposal	Erection of single wind turbine with hub height of 48m & total height to tip of blades of 64.7m
Site Location	Trelessy Farm, Amroth, Narberth, Pembrokeshire, SA67 8PT
Case Officer	Liam Jones

Summary

This application proposes the erection of a wind turbine at Trelessy Farm in Amroth. The turbine proposed measures 48m to its hub height and to a maximum height to blade tip of 64.7m. Whilst the principle of renewable energy throughout the National Park is accepted, this is on the proviso that there would be no over-riding environmental and amenity considerations. The turbine proposed is a medium scale turbine falling just below the 65m threshold (to a large turbine) as outlined in the Authority's Supplementary Planning Guidance 'Renewable Energy'.

Officers consider that the wind turbine proposed is of a scale and appearance which will result in an adverse effect on the character and appearance of the surrounding land within the National Park. The turbine would be a highly prominent addition to the site which would fail to integrate with its unspoilt surroundings. It would be visible from key tourist viewpoints, public highways and from private land and as a result would harm the special qualities of the National Park and be in direct conflict with the purpose of the National Park in promoting enjoyment of its special qualities. The proposal fails to comply with the aims of policies 1, 8, 15, 30 and 33 of the LDP.

Furthermore there is insufficient available to the Authority to allow a full consideration of the impact of the turbine upon the local highway network and highway safety, the amenities of nearby residents by virtue of noise pollution, impact upon archaeological interests and cumulative impact. As a result of this the application is considered to be unacceptable and is recommended for refusal.

This application has been reported to the Development Management Committee at the request of a member of the Authority.

Consultee Response

Amroth Community Council: Objecting

PCC - Head of Public Protection: Objecting – lack of information

Countryside Council for Wales: Reply - CCW does not wish to comment on the proposal

PCC - Transportation & Environment: Objecting – lack of information

Dyfed Archaeological Trust: Concern - Dyfed Archaeological Trust request that an archaeological survey is submitted and that without this further information the Authority should consider refusing the application

CPRW: Objecting

Carmarthenshire County Council – No response to date

Pembrokeshire County Council – No response to date

Public Response

The application was advertised by display of site notices at the farm entrance and along the public bridlepath to the south of the application site. In addition, letters were forwarded to those properties in proximity to the application including Goetre Farm, Beechlea, Corner, Eastlake and The Factory House.

As a result of public consultation 40 No. letters or e-mail objection representations have been received as well as 1 No. email in support of the proposal (*Number of objections complete as of the closing date for representations on 24th April 2012*). More than one representation from one person has been counted as 1 No. representation.

In addition to this a petition with 370 No. named signatures objecting to the proposal was received on 23rd April 2012. The petition includes a catalogue of names, addresses and dates as well as standard letters with grounds of objection and policy noted.

Copies of all letters of representation received as well as the petition are available to inspect within the planning application file with prior appointment and some of the comments and concerns raised are as follows:

- Incompatible with recently adopted LDP.
- Massive visual impact in an area vitally important for tourism.
- The National Park has a responsibility to protect this area of outstanding natural beauty. A huge wind turbine is neither natural nor an object of beauty.
- The proposed site of the turbine is in a very prominent position and will be clearly visible for miles around. Such spoiling of the scenery is bound to have an adverse affect on tourism and therefore adversely affect the livelihoods of many residents.
- The Appraisal of Impacts (Para 26) states that the *turbine “will not be visible from any short/medium distance public vantage points”* and *“will only be visible from a very limited number of longer distance public vantage points”*. The carefully chosen locations of the photographs with the appraisal seem to bear this out. However, the fact is that the

turbine will most definitely be visible from large areas of the coastal path, other footpaths, locations and beaches in the area.

- Massive structure will dominate this part of south Pembrokeshire and be visible from all the local beaches, the coast path and our beautiful unspoilt countryside.
- Placing a large artificial and stark turbine in such a landscape at the start of the Coastal National Park would greatly detract from all of the 'special' features of the National Park.
- If this development is allowed, others will follow, and the cumulative impact will be totally devastating to our precious countryside and must be stopped.
- This wind turbine will form an ugly exclamation mark on the landscape for every tourist as they enter the Pembrokeshire Coast National Park along the A477 trunk road from St Clears.
- Amroth thrives as a tourist attraction because of its unspoilt tidal sand flats, its fossil forest and its position at the start of the Pembrokeshire Coastal Path. Any visitor to the low tide sand flats and fossil forest will be presented with a stark appearance of this wind turbine. The turbine will also visually assault those walkers starting along the first half kilometre of the Pembrokeshire Coastal Path, from between SN168071 (Amroth Castle) and SN 172072 (The New Inn).
- The skyline against which this turbine is planned is currently pristine and aesthetically pleasing. Such a visual impairment would undoubtedly damage the character of the Pembrokeshire Coast National Park, and also the coastal landscape of the Coast Path.
- This would be the first 'large' wind turbine in the area and would be the largest such construction within any UK National Park. Such a turbine would therefore set a precedent for this type of development in the Pembrokeshire National Park in particular and within our National Parks in general.
- Determination should be deferred until the results of a study commissioned by PCC into the cumulative effect of turbines in this general area has been published and the results considered by Planning Authorities.
- The turbine will sit near the centre of the focal point on the landscape for a large number of properties in the Llanteglos area and all the properties at Llanteg Park.

Item 6 - Report on Planning Applications

- Noise pollution effects surely need proper analysis with sound sensors, taking into account the special acoustic character of the valley.
- Ecological impact on bats and birds.
- Unexplored impact on historic remains.
- The proposal is disproportionate to needs and scale of the dairy farm in question.
- The proposed installation would be detrimental to the open farmland views and public access, that the Pembrokeshire National Park is so famous for.
- Concern regarding horses being 'spooked'.
- It would severely impact on the beauty, tranquillity and amenity of the area.

Policies considered

LDP Policy 01 - National Park Purposes and Duty

LDP Policy 07 - Countryside

LDP Policy 08 - Special Qualities

LDP Policy 11 - Protection of Biodiversity

LDP Policy 15 - Conservation of the Pembrokeshire Coast National Park

LDP Policy 29 - Sustainable Design

LDP Policy 30 - Amenity

LDP Policy 31 - Minimising Waste

LDP Policy 32 - Surface Water Drainage

LDP Policy 33 - Renewable Energy

LDP Policy 53 - Impacts on traffic

PPW4 Chapter 01 - Introduction

PPW4 Chapter 02 - Development Plans

PPW4 Chapter 03 - Making and Enforcing Planning Decisions

PPW4 Chapter 04 - Planning for Sustainability

PPW4 Chapter 05 - Conserving and Improving Natural Heritage and the Coast

PPW4 Chapter 06 - Conserving the Historic Environment

PPW4 Chapter 13 - Minimising and Managing Environmental Risks and Pollution

SPG06 - Landscape Character Assessment Study, June 2009

SPG08 - Validation of Planning Applications

SPG13 - Archaeology

SPG14 - Renewable Energy
TAN 05 - Nature Conservation and Planning
TAN 06 - Planning for Sustainable Rural Communities
TAN 08 - Renewable Energy
TAN 11 - Noise
TAN 12 - Design
TAN 18 - Transport

Officer's Appraisal

Background & Description

The application site comprises an agricultural field that forms part of Trelessy Farm which lies near the boundary of the National Park. The surrounding land is distinctly rural in character with the valley and hills rolling southwards towards the Pembrokeshire Coast. The land offers a sense of tranquillity and calmness. There is a band of woodland stretching along the east of the application site and boundary of the National Park down towards the village of Amroth to the south west. There are dispersed pockets of development to the north of the site and outside the National Park including Llanteg, Llanteglos and Llanteg Park.

Relevant Planning History

Whilst there is no recent planning application history the site has been subject to two recent screening opinions:

- NP/11/516 – Trelessy Farm – Erection of a single wind turbine, with hub height of 48 metres (total height 64.7 metres) (Screening Opinion) – EIA not required – 22 December 2011
- NP/11/444- Trelessy Farm – Erection of a single wind turbine, with a hub height of 37 metres (total height 53.7 metres) (Screening Opinion) – EIA not required – 18 November 2011

Current Proposal

The application proposes the erection of a single wind turbine in an agricultural field to the south east of the main farm buildings at Trelessy farm. The model proposed is an Enercon 33/330kW which is a galvanised steel mast and fibreglass rotor with a non-reflective grey surface.

The proposed wind turbine faces south and would have a hub height of approximately 48m, and a 16.3m blade radius, giving a maximum height to blade tip of 64.7m.

Plans show the provision of a concrete plinth, area of grasscrete surrounding and grasscrete access road along with a building referred to as 'inverter'

Item 6 - Report on Planning Applications

housing'. This building measures 3.9m x 2.4m and up to a height of 2.5m with a flat roof. The building is finished in green and black painted steel cladding and includes green painted louvered doors on its front and side elevations.

Plans show the wind turbine will be connected to the adjacent farmstead via an underground cable laid across the agricultural fields.

The application has been supported with the following documents:

- ENERCON product specification
- Design and Access Statement
- Ecological Impact Assessment
- Delivery of Turbine and Construction Plant information
- Ion acoustics report
- Sound Power Level of ENERCON E-33
- Transport Statement
- 4 x viewpoints annotated

Key Issues

The main issues to consider in respect of this application relate to the impact of the proposed development upon the following planning considerations:

- Principle of Development
- Visual Amenity and the Special Qualities of the National Park
- Cumulative Impact
- Noise Impact and Impact upon Residential Amenity
- Wildlife and Biodiversity
- Cultural Heritage and Archaeology
- Transportation and Highway Safety

Principle of Development

It is recognised at UK and Welsh Government level that there are a wide range of policy statements supporting the need to combat climate change and increase the production of renewable energy. Of particular note in Wales is the Welsh Government's Energy Policy Statement (March, 2010) which sets out the challenge of climate change and a need to reduce emissions of carbon dioxide and other greenhouse gases from energy generation.

Relevant national policy and guidance is set out in Planning Policy Wales (PPW, Edition 4 February 2011) and Technical Advice Note 8: Planning for Renewable Energy (TAN 8, July 2005). The central theme running through PPW and TAN 8 is that the principle of renewable energy is supported provided that landscape character is not compromised to an unacceptable degree. PPW explains "*the introduction of new often very large structures for onshore wind needs careful consideration to avoid, and where possible minimise their impact.*" (PPW, para 12.8.12)

Item 6 - Report on Planning Applications

Onshore wind power is seen as offering the greatest potential for an increase in the generation of electricity from renewable energy in the short to medium term and TAN 8 identifies 7 Strategic Search Areas (SSAs) throughout Wales as being sites to deliver the Welsh Government's energy policy aspirations. Large scale schemes (over 25MW) onshore wind developments should be concentrated into the SSA's. In respect of National Park areas TAN 8 advises that large scale wind power proposals within a National Park or Area of Outstanding Natural Beauty would be contrary to well established planning policy and thus SSA's have not been considered for these areas.

TAN 8 states:

"The Assembly Government expects local planning authorities to encourage, via their development plan policies and when considering individual planning applications, smaller community based wind farm schemes (generally less than 5 MW). This could be done through a set of local criteria that would determine the acceptability of such schemes and define in more detail what is meant by "smaller" and "community based". Local planning authorities should give careful consideration to these issues and provide criteria that are appropriate to local circumstances.

Most areas outside SSAs should remain free of large wind power schemes. Local planning authorities may wish to consider the cumulative impact of small schemes in areas outside of the SSAs and establish suitable criteria for separation distances from each other and from the perimeter of existing wind power schemes or the SSAs. In these areas, there is a balance to be struck between the desirability of renewable energy and landscape protection. Whilst that balance should not result in severe restriction on the development of wind power capacity, there is a case for avoiding a situation where wind turbines are spread across the whole of a county."

Therefore, while the above advice is supportive of wind power in principle, given that the site lies outside of a Strategic Search Area (SSA), the above advice in TAN 8 in respect of balancing the benefits against landscape protection is of particular relevance.

The National Policy approach has been reflected in the Authority's Local Development Plan (LDP). Policy 33 of the LDP favours small scale renewable energy schemes provided there are no over-riding environmental and amenity considerations. The Policy also caters for medium and large scale energy schemes although explains that medium scale proposals offer 'some potential' and large scale proposals will only be permitted where they do not compromise the special qualities of the National Park. The Policy reads as follows:

Policy 33 RENEWABLE ENERGY (Strategy Policy)

Small scale renewable energy schemes will be considered favourably, subject to there being no over-riding environmental and amenity considerations. Medium scale schemes also offer some potential and will be permitted subject to the same considerations. Large scale

Item 6 - Report on Planning Applications

renewable energy schemes will only be permitted where they do not compromise the special qualities of the National Park. Where there are other renewable energy schemes already in operation in the area, cumulative impacts will be an important consideration.

Onshore connections to off shore renewable energy generators will also be permitted subject to there being no over-riding environmental and amenity considerations. Developers requiring an undeveloped coastal location for onshore connections to offshore renewable energy installations will need to clearly justify this need in relation to Policy 8i) with the least obtrusive approach to design being taken.

The supporting text to the Policy at point 4.148 (f) states *“On wind energy developments: There is potential for small scale proposals (10kW-50kW) and to a lesser degree medium scale proposals (50kW-330kW). Finally, there are extremely limited opportunities for larger scale proposals (>330kW-3MW).”*

In addition to the above Policy framework of the LDP the Authority has adopted Supplementary Planning Guidance (SPG) entitled ‘Renewable Energy’. This guidance sets out the key considerations in relation to wind turbine developments (Chapter 9) as well as the key landscape sensitivities and general guidance for siting wind energy schemes within the National Park. In the context of the National Park the Authority has identified four sizes of wind turbines, which are broken into the following categories:

Size	Height	Energy output
Large	65m-125m	330kW – 3MW
Medium	25m-65m	50kW – 330kW
Small	<25m	10kW – 50kW
Micro	Building or mast mounted	<10kW

Having regard to the thresholds explained above and as set out in the SPG, the size and output of the proposed wind turbine would meet the definition of a medium scale wind project. The wind turbine measures to a blade height of 64.7m with an energy output of 330kW.

Annex 2 of the SPG provides a map of the National Park and details landscape sensitivity to small, medium and large-scale Wind Turbine proposals. 28 No. Landscape Character Area’s (LCAs) are identified in the SPG with this proposal falling within LCA1 – Saundersfoot Settled Coast. The SPG and annex plans are derived from the CCW LANDMAP information system which provides a consistent all Wales approach to landscape assessment as recognised in Planning Policy Wales (Edition 4, paragraph 5.3.13) and this forms a useful basis against which to judge planning applications.

The proposed site falls within a ‘Moderate to High’ landscape in terms of sensitivity to medium scale wind turbine developments. As a result of this full and careful consideration to the impact of the proposed development upon the landscape character and setting of the area is required. As noted in the guidance *“The National Park Authority should ensure that any wind turbine development located within this LCA does not sacrifice the essential integrity, coherence and character of the landscape or the special qualities of the*

National Park'. Full consideration therefore needs to be given to the statutory purpose and duty of the National Park as outlined in Policy 1 – 'National Park Purposes and Duty' as well as key landscape protection policies including Policy 15 – 'Conservation of the Pembrokeshire Coast National Park' with reference to Policy 8 – 'Special Qualities'. As explained earlier in the report consideration should also be given to all other key material planning considerations.

Visual Amenity and the Special Qualities of the National Park

The proposed site is within an agricultural field that forms part of Trelessy Farm which lies near the boundary of the National Park. The surrounding land is distinctly rural in character with hills rolling southwards towards the Pembrokeshire Coast and the land offers a sense of tranquillity and calmness. There is a band of woodland stretching along the east of the application site and boundary of the National Park down towards the village of Amroth to the south west. There are dispersed pockets of development to the north of the site and outside the National Park including Llanteg, Llanteglos and Llanteg Park.

In terms of local landscape character the surrounding land is occupied by farm holdings including 'Goetre' farm to the north and 'Eastlake' farm to the east as well as some individual dwelling houses and caravan parks to the northwest and south of the site. There is a public bridleway leading from the entrance to Trelessy farm to the coast as well as a public right of way leading through Eastlake Farm and towards Amroth.

The applicant has not undertaken a detailed landscape and visual impact assessment of the proposed wind turbine but has submitted four photographs of views towards the site located within the National Park. The Design and Access Statement (DAS) (point 26) states that *"a detailed driving and walking survey of the network of public roads and rights of way within the area revealed that the proposed turbine will not be visible from any short/medium distance public vantage points because of the combination of undulating topography, high roadside and field boundary hedgerows and dense woodland areas."* The DAS also suggests that *"the wind turbine will not be visually prominent within the wider undeveloped landscape nor against prominent skylines."*

Due to the topography of the site and surrounding landscape character officers consider that the proposed wind turbine would be a very visible addition to the site. As the land lies within 'moderate-high' sensitivity the SPG already advises that *"many of the key characteristics of the landscape would be adversely affected by the renewable energy development. Such development would result in a noticeable change in character. There may be some limited opportunities to accommodate the renewable energy development without changing landscape character. Great care would be needed in locating infrastructure"*. The sensitivities identified in LCA1 are to be taken into account in assessing visual impact of a wind turbine development. Should the scheme not protect all key sensitivities identified it will not be

considered an acceptable form of development. Through the DAS the applicant has provided a discussion of differing views and topics from the sensitivities identified in LCA1 but has clearly failed to demonstrate that the wind turbine proposed would not impact to an unacceptable degree on the landscape character of the National Park.

Officers have visited the site and assessed the potential visual impact the wind turbine would bring to surrounding land and further viewpoints in the landscape. As a result of these visits and from use of the Authority's own GIS analysis it is considered that the proposed turbine would be visible from a number of key points including:

- Its immediate farmland surroundings including Goetre and Eastlake farms
- points along the bridleway and public footpath near the site entrance
- the highway which runs to the south of the application site leading from Amroth towards Marros and Pendine
- the highway which leads North from Amroth to the A477
- the coast path between Wisemans Bridge and Saundersfoot
- land leading into the National Park from along the A477 near Llanteg and from residential properties at Llanteg Park
- Saundersfoot beach and harbour
- land near Monkstone Point

Whilst some people may see wind turbines as very elegant or perhaps attractive structures for many they are unwelcome intrusions into the natural landscape and environment. Planning Policy Wales (Edition 4 September 2011) advises at paragraph 3.1.8 that local planning authorities must take into account any relevant view on planning matters expressed by neighbouring occupiers, local residents and other third parties. Local opposition or support for a proposal is not, on its own, a reasonable ground for refusing or granting planning permission and objections must be based on valid planning considerations. PPW also advises that the Courts have held that the perceived fears of the public are a material planning consideration that should be taken into account in determining whether a proposed development would affect the amenity of an area and could amount to a good reason for refusal of planning permission.

This application has received a considerable level of objection with 40 No. objection letters and a signed petition with 370 signatures. 1 No. e-mail of support was received. The letters raise various planning and non-planning considerations and weight should be given to the planning concerns raised particularly in relation to the visual impact of the proposal upon the surrounding landscape.

Notwithstanding the level objection received to the application officers consider that the siting of the wind turbine would be an insensitive and unsympathetic development in the surrounding landscape. The turbine would result in a significant visual intrusion along the coast and would become a

prominent development affecting the rural and coastal skylines from near and more distant views. The surrounding area encompasses a number of residential properties and public viewpoints and this would become a large focal point in the area to the detriment of the unspoilt surrounding landscape. The sheer scale of the turbine will impact to an unacceptable degree on the above identified viewpoints and the turbine would be visible along much of the coast even from more far reaching views from Tenby.

Furthermore it is considered that the visual effect from the man-made feature would reduce the qualities of wilderness that attract visitors to the National Park and as a result harm the special qualities which make up a National Park as noted in policies 8 and 15. This development would be in direct conflict with the purpose of promoting enjoyment of its special qualities and the degree of harm from this development would be significant.

The development would fail to comply with the listed criteria (a-e) of Policy 15 – Conservation of the Pembrokeshire Coast National Park in that it would adversely affect the qualities and special character of the National Park by;

- Causing significant visual intrusion
- Being insensitively and unsympathetically sited within the landscape
- Introducing or intensifying a use which is incompatible with its location
- Failing to harmonise with, or enhance the landform and landscape character of the National Park; and
- Losing or failing to incorporate important traditional features.

Whilst the development proposed would bring environmental and economic benefits of renewable energy generation which is generally favoured under Policy 33 it is not considered that these benefits would outweigh the harm that would arise to the landscape of the National Park in this instance. Where an identified harm exists the Authority must protect its statutory purpose in conserving and enhancing the natural beauty, wildlife and cultural heritage of the Park, and, the public understanding and enjoyment of those qualities, in accordance with Policy 1 of the LDP.

Cumulative Impact

TAN8 as well as PPW recognise that wind developments can have far reaching cumulative impacts upon the countryside and careful consideration needs to be given to potential impact. PPW at paragraph 12.8.14 advises that *“The development of large wind farms or other large scale renewable and low carbon energy schemes will not generally be appropriate in internationally or national designated areas and sites”* (this includes National Parks).

The Authority is aware of existing and proposed wind turbines outside the National Park boundary to the north of the site. There are four built wind turbines and three current applications being dealt with by Pembrokeshire County Council. Officers understand that these applications are being held in abeyance by the County Council pending work on a cumulative impact assessment. Officers have consulted with Pembrokeshire County Council and

been advised that they have instructed a consultant to prepare a guidance note to advise on what level of information they should have in dealing with applications of different scales. However they advise that the onus is on the applicant to provide the cumulative assessment through Visual Impact Assessments. No information has been provided with this application in respect of cumulative impacts.

Some representations received have stated that a decision should not be made on this current application until the outcome of the cumulative impact assessment is known. Whilst the proximity of the existing and proposed wind turbines to the boundary of the National Park is noted, it is not considered reasonable to defer this current application pending the decision on applications within a different Authority. Whilst cumulative impact can be a material consideration and indeed would need a full consideration had officers found the application to be capable of approval, the Authority must primarily consider the impact of the proposed turbine upon the National Park area within which it would be sited.

Notwithstanding the above, there is nonetheless insufficient information provided within the application by means of a Visual Impact Assessment to determine the cumulative impact of the proposal in the area both within and outside the National Park Boundary. Accordingly this lack of detailed information adds to the concern as already raised above and adds weight to the decision to refuse planning permission for the proposal.

Noise Impact and Impact Upon Residential Amenity

The proposed wind turbine has the potential to impact upon neighbouring occupiers by means of noise pollution. The applicant has submitted a plan with surrounding residential properties and likely noise level. A specification of the sound power level for the model proposed (E-33) has been submitted showing the sound power level in relation to standardised wind speed. The plan identifies the noise level likely from a number of receptors around the site and this varies from 31.9 dB L_{A90} at East Lake Farm House to the west to 38.9 dB L_{A90} at Trelessy Bungalow to the west of the main farm buildings at Trelessy Farm.

The Authority has received an objection from the Pollution Control section of Pembrokeshire County Council on the basis of the level of information submitted and requests the submission of further details. Following guidance given in the assessment and rating of noise from wind farms, 1996 (ETSU-R-97) they have concerns with the submitted information. Their initial response raised concern with the following:

1. No method for the prediction method for turbine noise generated at sensitive locations has been given
2. The IEA recommended practice (given by ETSU-R-97) states that a wind speed of 8m/s at 10 metre height should be used and the

Item 6 - Report on Planning Applications

applicant has used 7m/s

3. No time period has been provided for the noise predictions
4. Background noise levels have not been provided
5. Sensitive receptors have been identified and indeed 2 of these are very close to the recommended ETSU 35 dbA noise limit. No further information has been given to describe these receptors and further information is required concerning outdoor living areas.

The applicant provided some of this information in response by email, however, some has not been provided. The Pollution Control Team requires the additional following information:

1. Distances to residential outdoor living areas have yet to be clearly identified
2. Methods for predictions have not been identified
3. Time periods over which receiver noise measurements have been produced have not been given

Furthermore dependant on the additional information required the Pollution Control Team may require background noise measurements as appropriate to support the application.

In an e-mail to the Authority on 9th April 2012 the applicant stated that as this application is a single wind turbine application they have submitted a Simplified Assessment Method which they believe accords with the findings of ETSU R97. The Pollution Control Section has advised that point 25 of ETSU states that a simplified noise condition may be suitable. It does not say that this condition should be applied to all development and therefore it does not go beyond what ETSU is saying especially when the applicant has failed to provide details as requested.

Further information has not been provided to date although the applicant is aware of the need for the submission of further information in order to satisfy the concerns of Pollution Control. Given the concern raised with the lack of information on this point the Authority is unable to adequately assess or demonstrate that there will be no adverse impact upon neighbouring amenity by virtue of noise impact. Accordingly it can be concluded that the proposed development may conflict with criterion (c) of Policy 30 and without further information the application fails to meet the aims of the policy. Whilst this aspect could be overcome through additional submissions it is not considered that satisfying these specific concerns would overcome the fundamental concern in respect of the impact upon the special qualities of the National Park as explained above.

Item 6 - Report on Planning Applications

In terms of potential impact by shadow flicker from the wind turbine the applicant has supplied on plan details of the potential zone of shadow flicker from the development. Given the distance from neighbouring properties and the relative positions of direct sunlight, and the height of the turbine shadow flicker is unlikely to affect any residents.

Wildlife and Biodiversity

Through the application a number of representations have been received about the likely effect on species of birds and bats. An ecological report accompanied the planning application which concluded that the site was of low ecological value, that the proposed development posed no significant impact on protected species, that there was a low risk to bats but there may be an impact on nesting birds if avoidance and mitigation measures were not in place.

It was noted that the bat survey was only undertaken in the autumn however given the initial assessment that the proposal was of low risk to bats it has not been considered necessary to undertake further survey work. Furthermore the proposed turbine would be located approximately 50m away from any hedgerow and the closest roosting and foraging opportunities are 200m and 350m away respectively. Through consultation CCW raise no objection and no comments or conditions are requested.

Whilst there would be some form of impact upon biodiversity it cannot be said that the work to be carried out and the actual turbine would have a detrimental impact upon biodiversity such that this could form a reason for refusal. Suitable planning conditions in respect of the need for a mitigation strategy for supplementary planting could be suitable in the interests of biodiversity.

Cultural Heritage and Archaeology

The application site lies a short distance away from several sites of historical and archaeological interest including a scheduled Iron Age enclosure known as The Castle, a cropmark enclosure, a medieval strip field system, a second scheduled enclosure, a Romano-British building and the possible medieval settlement of Trelessy itself.

The applicant has made no reference to impact upon archaeology even though the development would involve a significant amount of ground disturbance close to the above mentioned sites. Consideration should therefore be given to advice contained in Chapter 6 of PPW which deals with Conserving the Historic Environment, Welsh Office Circular 60/96 'Planning and the Historic Environment: Archaeology' as well as LDP Policy 8 which deals with the Special Qualities of the National Park which includes archaeology.

Dyfed Archaeology has been consulted as part of the application process and whilst not objecting to the application they request the submission of an archaeological appraisal in order for them to assess the impact upon the

Item 6 - Report on Planning Applications

historic environment. They state *"In terms of this development, we cannot guarantee that buried archaeology does not extend into the development area and will therefore be damaged or destroyed. Consequently, in order to provide further information on the archaeological potential and the impact of the proposed development on that resource, we recommend, in the first instance, that an archaeological appraisal is commissioned by the applicant"*.

Policy 8 criterion (d) states that the special qualities of the Pembrokeshire Coast National Park will be protected and enhanced to ensure that *"the historic environment is protected and where possible enhanced"*. Furthermore Welsh Office Circular 60/96, paragraph 14, states that *"Authorities will need to consider refusing permission for proposals which are inadequately documented"*. In view of the lack of information received on this aspect and the need for further work it is difficult to assess the impact of the proposal upon archaeology. As a result the Authority is unable to determine whether the development would impact unacceptably on archaeology.

Given the concerns in respect of the potential impact upon sites of historical and archaeological interest and on the basis of the advice received from Dyfed Archaeological Trust the Authority has consulted CADW on potential impact upon the setting of the statutory protected monuments. No response has been received on production of this report and any comments received will be relayed to members verbally at committee.

Transport and Highway safety

The DAS submitted (at point 36) states *"the delivery of the wind turbine and construction plant can be satisfactorily accommodated by the existing vehicular highway access to and within Trelessy Farm"*. The applicant has also submitted a statement regarding the *'delivery of turbine and construction plant'* which suggests that it would be delivered in 3 equal length sections of approximately 15m and transported on standard articulated lorries.

The Highway Authority has been consulted as part of the application and recommend refusal of the application on the grounds that there is insufficient information contained within the application to enable a consideration of the impact of the proposal.

The response received notes that construction vehicles will have to use an unclassified road for 1200 m from the junction with the main class 3 road within Llantegloes to the farm access lane. The likely route to the site for the lorries carrying the main components will be a further 1200 metres from the A477 Trunk Road at Llanteg.

The Highway Authority advise that the transportation of each of the three blades for the turbine will require a special 22m long blade trailer with 4 steering axils at the rear to make an overall length of over 25m. Due to a number of tight bends on the unclassified road there is a high possibility of damage to highway verges and deep highway drainage ditches with the likelihood that third party land will be required to move hedgerows. Some of

the changes required to facilitate the access will be permanent and the tight turn at the end of the unclassified road is also likely to require hedgebank loss.

The applicant has been advised of the response received which informs of the need for a Traffic Management Plan in order that the transport route and methodology can be fully considered. In response the applicant advises that the comments of the Highway Authority are incorrect in that the blades are stated as 16.2m long and their blade trailer is 13.6m long not 22m long as quoted.

Notwithstanding the applicant's comments there is considered to be insufficient information to be able to assess whether the proposals would impact to an unacceptable degree upon highway safety or impact upon visual amenity by reason of the access and removal of hedgerows to facilitate access.

In view of the above the proposed development may conflict with Policy 53 and without being aware of additional details on the proposed access and route it is very difficult to assess the overall impact this development would have upon highway safety, the local landscape character and biodiversity. Whilst there is no reason to suggest that this matter could not be overcome through the submission of further details or by means of a suitable planning condition it is not considered that this would overcome the harm of the proposed wind turbine development upon the special qualities of the National Park as noted above.

Conclusion

Following a consideration of the planning merits of the scheme and its impacts it is concluded that the wind turbine proposed is of a scale and appearance which will result in an adverse effect on the character and appearance of the surrounding land within the National Park. The turbine would be a highly prominent addition and fail to comply with policies 1, 8, 15, 30 and 33. Furthermore there is insufficient information and detail available to the Authority to allow a full consideration of the impact of the turbine upon the local highway network and highway safety, the amenities of nearby residents by virtue of noise pollution, archaeological interests and cumulative impact. There are no material considerations put forward which would outweigh the policy of the LDP which aims at conserving or enhancing the natural beauty, wildlife and cultural heritage of the National Park and the public understanding and enjoyment of those qualities.

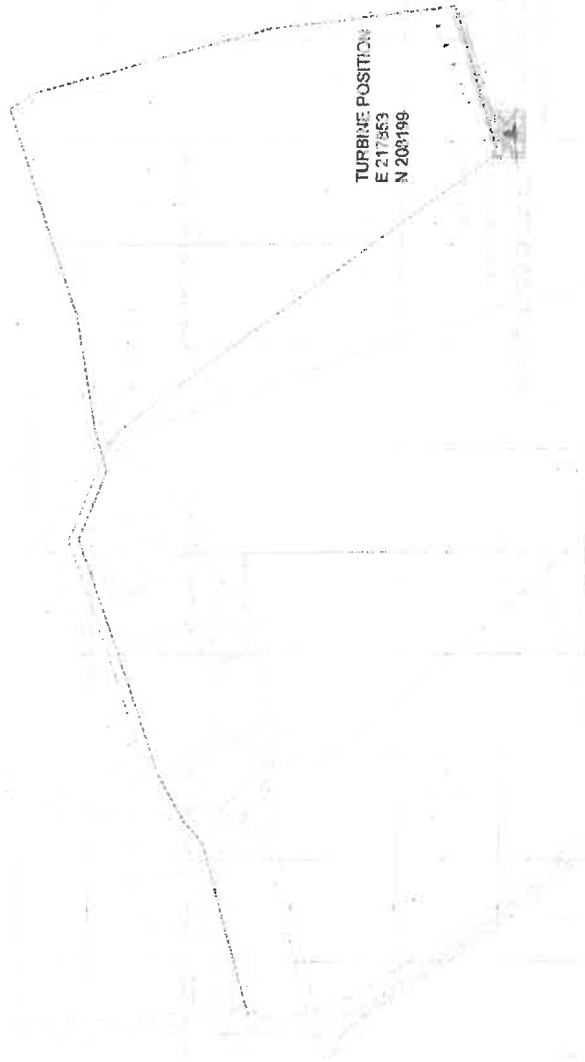
The decision to refuse planning permission has been taken in accordance with Section 38 of The Planning and Compulsory Purchase Act 2004, which requires that, in determining a planning application the determination must be in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan comprises the Pembrokeshire Coast National Park Authority Local Development Plan (Adopted September 2010).

Recommendation

REFUSE for the following reasons:

Reasons

1. The proposed wind turbine would by virtue of its scale, siting, appearance and visual impact result in a significant visual intrusion which would impact to an unacceptable degree on the character and appearance of the National Park to the detriment of the unspoilt surrounding landscape. The turbine would be a prominent addition to the coastline and visible along key tourist viewpoints, public highways and from private land and as a result would harm the special qualities of the National Park and be in direct conflict with the purpose of the National Park in promoting enjoyment of its special qualities. As a result the proposal would conflict with Policy 1 (National Park Purposes and Duty), Policy 8 (Special Qualities), Policy 15 (Conservation of the Pembrokeshire Coast National Park), Policy 30 (Amenity), Policy 33 (Renewable Energy) as well as Supplementary Planning Guidance 'Renewable Energy' (Adopted 12 October 2011), Technical Advice Note 8: Planning for Renewable Energy (July 2005) and National Policy contained within Planning Policy Wales (Edition 4, September 2011).
2. Insufficient information has been submitted to enable the local planning authority to fully assess the impact of the wind turbine and its delivery to the site upon the local highway network and highway safety, the amenities of nearby residents by virtue of noise pollution and archaeological interests. As a result the application fails to demonstrate that the proposed development complies with Policy 53 (Impacts of Traffic) criterion (c) and (d), Policy 30 (Amenity) criterion (c) and Policy 8 (Special Qualities) criterion (d).
3. Insufficient information has been submitted by means of a Visual Impact Assessment to enable the local planning authority to properly assess the cumulative impact of the wind turbine proposed and existing wind turbines within Pembrokeshire County Council upon the National Park and wider area. As a result the application fails to accord with the aims of Policy 1 (National Park Purposes and Duty), Policy 8 (Special Qualities), Policy 15 (Conservation of the Pembrokeshire Coast National Park), Policy 30 (Amenity), Policy 33 (Renewable Energy) as well as Supplementary Planning Guidance 'Renewable Energy' (Adopted 12 October 2011), Technical Advice Note 8: Planning for Renewable Energy (July 2005) and National Policy contained within Planning Policy Wales (Edition 4, September 2011).



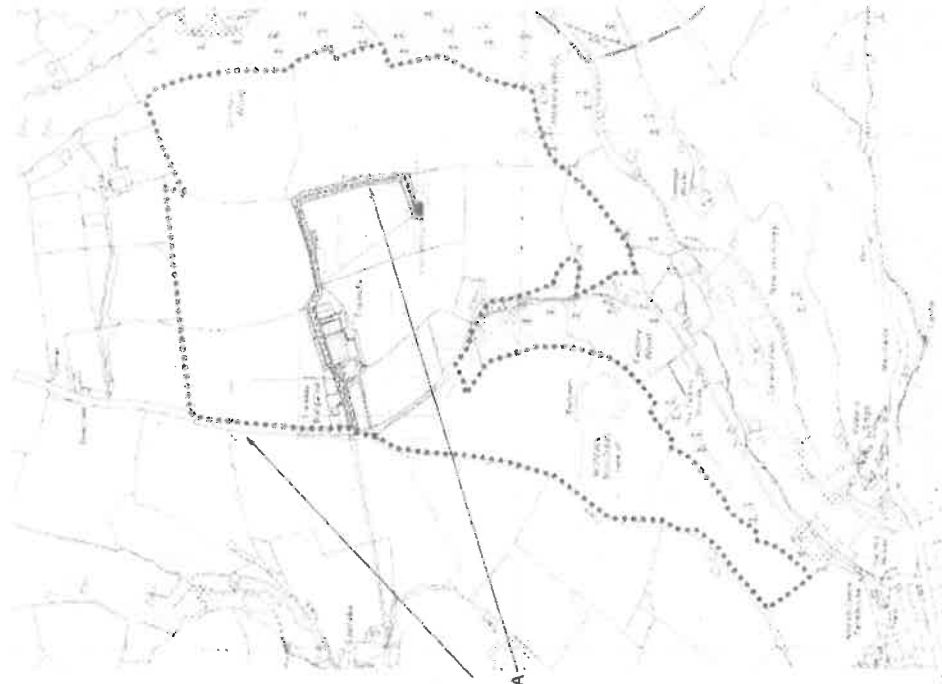
PROPOSED SITE PLAN

SCALE 1:1250



SHADOW FLICKER ZONE

SCALE 1:5000 at A1



SITE OWNERSHIP

LOCATION PLAN

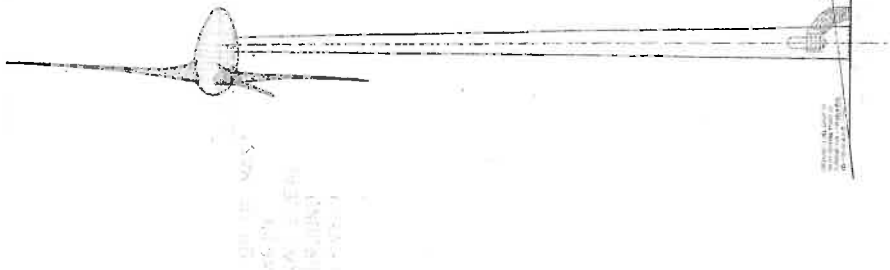
SCALE 1:5000 at A1

1. CONSULTING ENGINEER'S NAME	2. PROJECT NAME	3. PROJECT LOCATION	4. PROJECT NO.
5. PROJECT ADDRESS	6. PROJECT CONTACT	7. PROJECT PHONE	8. PROJECT FAX
9. PROJECT EMAIL	10. PROJECT WEBSITE	11. PROJECT URL	12. PROJECT DATE

PLANNING APPLICATION
 17 APR 2007
 17 APR 2007

NP/12/133

DATE	17 APR 2007
PROJECT NAME	SAUNDERSFOOT
PROJECT LOCATION	SAUNDERSFOOT
PROJECT CONTACT	
PROJECT PHONE	
PROJECT FAX	
PROJECT EMAIL	
PROJECT WEBSITE	
PROJECT URL	
PROJECT DATE	17 APR 2007



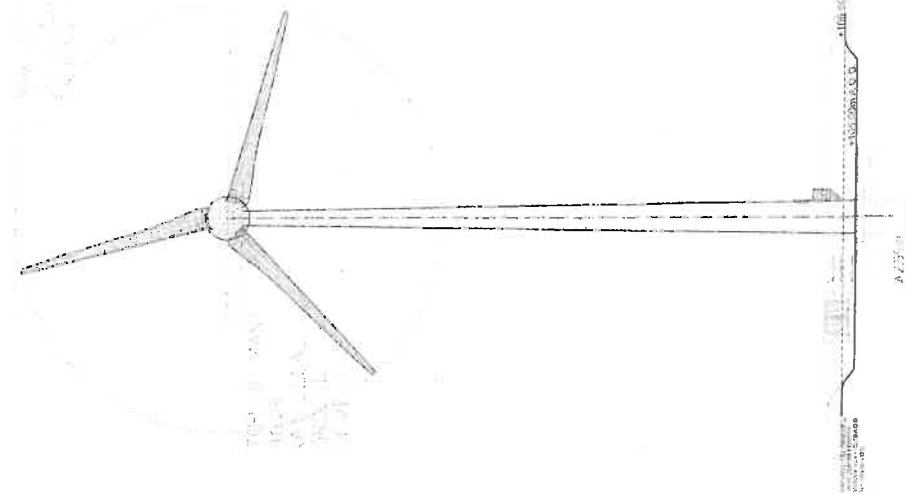
PROPOSED SIDE ELEVATION
SCALE 1:500 at A1

INVERTOR HOUSING ELEVATIONS
SCALE 1:500 at A1

- CONCRETE PLINTH
- GROUND REINSTATED
- INVERTOR HOUSING

SIDE ELEVATION

SIDE ELEVATION

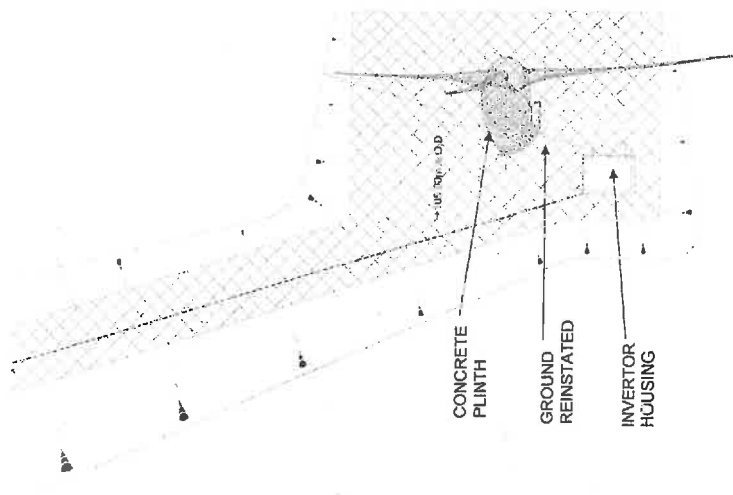


PROPOSED FRONT ELEVATION
SCALE 1:200 at A1

- CONCRETE PLINTH
- GROUND REINSTATED
- INVERTOR HOUSING

FRONT ELEVATION

FRONT ELEVATION



PROPOSED PLAN
SCALE 1:200 at A1

- CONCRETE PLINTH
- GROUND REINSTATED
- INVERTOR HOUSING

REAR ELEVATION

REAR ELEVATION

DATE	17 APR 2013
PROJECT	WIND TURBINE FOUNDATION
CLIENT	WIND ENERGY
SCALE	1:200
PROJECT NO.	WIND/12/133
DATE	17 APR 2013
PROJECT	WIND TURBINE FOUNDATION
CLIENT	WIND ENERGY
SCALE	1:200
PROJECT NO.	WIND/12/133

DATE	17 APR 2013
PROJECT	WIND TURBINE FOUNDATION
CLIENT	WIND ENERGY
SCALE	1:200
PROJECT NO.	WIND/12/133
DATE	17 APR 2013
PROJECT	WIND TURBINE FOUNDATION
CLIENT	WIND ENERGY
SCALE	1:200
PROJECT NO.	WIND/12/133