

# **Gwynedd and Anglesey Joint Local Development Plan**

## **Written Statement by the Llŷn AONB Joint Advisory Committee**

The Llŷn AONB Joint Advisory Committee was established in 1997 in order to contribute to the work of protecting and looking after the AONB. Members include local Councillors, members of Community Councils and representatives of local organisations and agencies such as Friends of Llŷn, the Agricultural Unions and the National Trust. Members discuss national and local issues, including planning matters, and contribute to the work of preparing and reviewing the AONB Management Plan.

### **Comment 944**

#### **1. Which part of the Plan is considered unsound?**

Policy ADN 2 - Other Renewable Energy Technologies.

#### **2. Which tests of soundness are not met?**

It is believed that this policy is too open-ended in respect of proposals outside development boundaries.

The policy is relevant to a range of renewable energy developments other than wind turbines - solar, biomass, ground heat pumps, hydroelectricity and combined power and heat. Some of these developments, and solar and hydroelectricity specifically, have the potential to have a substantial environmental impact. Such applications should be assessed in detail and the policy should give clear guidance to developers in terms of what would be acceptable.

#### **3. Why does it fail?**

The policy does not include clear and robust criteria in terms of weighing up other renewable energy developments - particularly outside development boundaries. Consequently, this does not give guidance to developers in terms of what would be suitable/unsuitable in terms of the renewable techniques in question.

The policy does not refer to designated areas, particularly statutory ones such as the Area of Outstanding Natural Beauty (AONB). This is a

significant shortcoming, particularly because no specific policy for maintaining and enhancing the AONB is included in the Plan.

The AONB is a geographical area which has a statutory designation under the National Parks and Access to Countryside Act 1949. Planning Policy Wales (Issue 8, 2016) states that the main objective while designating an AONB is to safeguard and enhance its natural beauty. It is noted that the AONB has the same status as the National Parks in terms of visual beauty and they should be afforded the highest status of protection from inappropriate developments.

The main basis for designating part of Llŷn as an AONB was the varied and interesting coastline and the beauty of the landscape. Approximately a quarter of the peninsula, a total of 15,500 hectares, is included in the designated area. The majority is coastal land but it also extends into the land to include Foel Gron and Garn Fadryn.

In essence, solar sites cover a fairly substantial land surface area. These developments could have a significant effect on the landscape of the area, including the AONB. Planning Policy Wales emphasises the need to give high protection to the AONB from unsuitable developments. Therefore, it is believed that solar farm developments of a substantial size should not be approved in the AONB or adjacent to the AONB where they would have a significant effect on views into and out of the area.

#### **4. How can the plan be made sound?**

It is believed that the policy needs to be amended in order to include clear and robust criteria for assessing applications for renewable energy developments outside development boundaries. Maintaining and enhancing statutory designated spaces/sites such as the AONB should be included as one of the criteria.

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### **Comment 950**

#### **1. Which part of the Plan is considered unsound?**

Policy ADN1 - Onshore Wind Energy

#### **2. Which tests of soundness are not met?**

The Area of Outstanding Natural Beauty (AONB) is a geographical area which has a statutory designation under the National Parks and Access to Countryside Act 1949. Planning Policy Wales (Issue 8, 2016) states that the main objective while designating an AONB is to safeguard and enhance its natural beauty. It is noted that the AONB has the same status as the National Parks in terms of visual beauty and they should be afforded the highest status of protection from inappropriate developments.

The intention to replace the term "mill" with "turbine" is noted and this change is welcomed.

The intention to change criterion 2 to refer to protecting the setting of the AONB is also welcomed.

However, it is not believed that the policy gives adequate protection to the Area of Outstanding Natural Beauty by approving wind turbines on a domestic scale (defined as up to 15 metres to the tip of the blade).

There is also concern about the categories and developments under 5MW being classed as 'Small', and that these could be approved fairly close to national designated sites.

### **3. Why does it fail?**

The main basis for designating part of Llŷn as an AONB in 1957 was the varied and interesting coastline and the beauty of the landscape. Approximately a quarter of the peninsula, a total of 15,500 hectares, is included in the designated area. The majority is coastal land but it also extends into the land to include Foel Gron and Garn Fadryn. Though the landscape and coastline form the main basis of the natural beauty there are many other features in the area which include: a varied wildlife, historical remains, the sea and its waves, the unique culture and the Welsh language which is still thriving.

Wind turbines in essence are developments which have a prominent effect on the landscapes and views. They are modern structures and the fact that the blades turn increases their prominence.

To date, no wind turbines have been approved within the designated area in Llŷn. Many have noted that visitors draw attention to this and appreciate that the area has been protected from wind turbines. Some applications have been approved on the outskirts of the area however e.g. Botwnnog, Abersoch, Rhoshirwaun. Unfortunately, these turbines have affected the beauty of the landscape and views in those places.

Therefore, it is believed that wind turbines should not be approved in the AONB and that turbines should be restricted to 11 metre ones within visibility of the AONB.

### **4. How can the plan be made sound?**

It is believed that the policy should be amended to prevent wind turbines entirely in the AONB.

Also, not to allow turbines higher than 11m within visibility of the AONB.

Revise the size of the turbines included in the "Small" category so that they are not of such a significant size.