



**Bryniau Clwyd a  
Dyffryn Dyfrdwy**  
Clwydian Range  
and Dee Valley

Ardal o Harddwch Naturiol Eithriadol  
Area of Outstanding Natural Beauty

Bryniau Clwyd a Dyffryn Dyfrdwy AHNE  
Park Gwledig Loggerheads, Yr Wyddgrug, Sir Ddinbych CH7 5LH

Clwydian Range and Dee Valley AONB  
Loggerheads Country Park, Nr. Mold, Denbighshire CH7 5LH

Ffôn | Tel [REDACTED]

E-bost | E-mail [REDACTED]

Gwefan: [www.ahnebryniauclwydaddyffryndyfrdwy.org.uk/](http://www.ahnebryniauclwydaddyffryndyfrdwy.org.uk/)

Web: [www.clwydianrangeanddeevalleyaonb.org.uk/](http://www.clwydianrangeanddeevalleyaonb.org.uk/)



[www.facebook.com/Clwydian Range & Dee Valley AONB](https://www.facebook.com/ClwydianRange&DeeValleyAONB)



@Clwyd\_Deer\_AONB

Cyf | Ref: DNS/3247619

Dyddiad | Date: 22 July 2021

**Harry Edgeworth**  
The Planning Inspectorate  
Cathays Park  
CARDIFF  
CF10 3NQ

Dear Mr Edgeworth

**DNS Application: Land at Gwernigron Farm, The Roe, St Asaph (Elwy Solar Energy Park)**

Thank you for consulting the AONB on this DNS application. The following observations are submitted on behalf of the AONB Joint Committee following consultation with the Chair of the Committee and the AONB Partnership:

**“The Joint Committee notes that the site is approximately 3.5km outside the AONB but, given the large scale and extent of the proposals, the committee is of the view that the development will inevitably impact on the setting of the protected landscape. This is as a result of the intervisibility between the site and an extensive area of the higher ground of the AONB to the east, north east and south east of the site. The ability to ‘experience space and freedom and uninterrupted and extensive views from high places’ is one of the defined Special Qualities of the AONB set out in the AONB Management Plan, and the committee is concerned that without sufficient mitigation the development will undermine this special quality.**

The LVIA which forms part of the ES concludes that the development will have no significant effects on the AONB and that the impact from the selected viewpoints in the AONB will be moderate or negligible. However, whilst the Joint Committee accepts that the impact will diminish with distance, the sheer scale and extent of the proposals will result in some negative change to the view from the protected landscape. Middle distance views into the Vale of Clwyd from the higher ground of the AONB will be affected as the open and undeveloped character of a large tract of open countryside is changed. The very extensive arrays of solar panels will contrast with and appear anomalous in the landscape, particularly if glint and glare is an issue. In this regard, the committee is disappointed that the glint and glare study submitted with the application only assessed the impact within a 1km buffer zone around the site and did not include any receptors within the AONB.

The Joint Committee notes that the current plans include a number of measures to mitigate landscape impacts and supports the proposals to retain existing woodland, trees and hedges and to undertake some new landscape planting. The LVIA comments that the mitigation measures will limit intervisibility and the potential impact on views from the AONB. However, the committee is of the opinion that the current landscaping proposals, whilst welcome, are insufficient to adequately mitigate the impact on views from the higher ground of the AONB and would call for a revised and more extensive landscaping scheme. The aim of an amended landscaping scheme would be to further reinforce and extend the existing landscape framework to help break up views of the massed areas of solar panels. This would include more substantial woodland planting along the A525, additional blocks of woodland within the site and breaking up the site with additional hedge planting supplemented with hedgerow trees to replicate the traditional character of the Vale of Clwyd landscape. A long term Landscape Management Plan should also be a requirement.

Finally, the committee would recommend that a lighting assessment and lighting plan should also be prepared to ensure that any external lighting is designed and managed to minimise any impacts on the AONB’s dark sky and nocturnal wildlife in the vicinity of the site.”

I would be grateful if you could take account of the committee’s views in deciding this DNS application.

Yours sincerely,

**Tony Hughes**  
For the Clwydian Range and Dee Valley Joint Committee