

# Cyngor Cymuned BANWY Community Council

Clerc / Clerk  
Mr . . . . .

Cefn Coed Uchaf  
Llanfihangel yng Ngwynfa  
Llanfyllin  
Powys  
SY22 5JF

Ffôn . . . . .  
Ebost / Email: ccBanwy@hotmail.co.uk

Secretary of State for Energy & Climate Change  
Energy Infrastructure Planning Team,  
Department of Energy and Climate Change,  
Area C 4th Floor,  
3 Whitehall Place,  
London SW1A 2AW

11 August 2016

Dear Secretary of State,

**Electricity Act 1989 & Town & Country Planning Act 1990**  
**Re-Determination of Applications to Construct Wind Turbine Generation Stations**  
**in Powys, Mid-Wales (Llanbrynmair and Carnedd Wen)**

Banwy Community Council wish to thank you for correcting their omission from the list of interested parties and for allowing them extra consultation time. The Council met on 9<sup>th</sup> August, discussed the issues and decided to make the following submission.

**Details of Council Area**

Banwy Community Council area (comprising the villages of Llangadfan and Foel) is in Powys on the north-west boundary of that county straddling the A458(T), which is a main feeder route from the West Midlands to the mid-Wales coast. The Snowdonia National Park is immediately adjacent to the west. The community has a primary school and community centre, local shop/café, restaurant, pub, two churches, three chapels, two large caravan sites and riding/cycling trails in the Dyfnant Forest in addition to many tourist and outdoor leisure enterprises and facilities. The Glyndwr's Way National Trail crosses the area from north to south through Llangadfan.

In relation to the two planning applications, the plateau immediately south of the A458(T) forms the northern edge of both proposed developments. 34 of the original 80 proposed turbines (4 from Llanbrynmair and 30 from Carnedd Wen) are located in the Council's area : the "Carnedd Wen Five" are included in that 30. The site access for Carnedd Wen – possibly for Llanbrynmair also - is from the A458(T) just over 1km before the area's western boundary and start of the Snowdonia National Park. An 80m. high temporary anemometer mast for Carnedd Wen, located close to the proposed site of turbine R30, has been in position for over 5 years. The whole structure is clearly visible from Foel village and the trunk road. The top 10m. of an identical mast, located close to the proposed site of turbine R50 at the far west of the site, was also visible from the same locations for the life of the mast.

## **Community Council Mandate**

When these two planning applications were first made, Banwy Community Council organised a confidential postal survey of all their electors to ascertain their views on these large scale wind-farms. There was a 70% response from the community, with 72% expressing opposition to the turbines and 83% opposed to any new electricity pylons that might result from development consent. This gave the Community Council a clear mandate to oppose the developments, which they did by submitting written and verbal evidence. The mandate was re-inforced when the Inquiry Inspector arranged a public meeting in the Community Centre. In a packed hall that evening virtually all the local people spoke in opposition to the developments. Only one person spoke in favour, saying that, as a farmer, he was only responding to the money incentive. In his report, the Inspector acknowledged that he was sure that the majority of local people opposed the wind-farms.

In June 2015 the UK government policy on localism related to on-shore wind-farms was made very clear, namely that they should be determined locally and that there must be a clear supportive mandate from the majority of local people for developments to go ahead. Support is clearly lacking in the case of these two projects.

## **Should the Public Inquiry be Re-opened ?**

The Community Council can see no justification for re-opening the inquiry. It is the weighting placed on some of the evidence by the Inspector that the Community Council challenges, particularly the way he appears to have favoured the submissions by the applicants' expert witnesses, who had no local knowledge, over those made by local residents and the experts who helped represent them.

## **New evidence**

The Community Council is not aware of any new factors. However, one of last winter's severe weather events caused flooding in the upper Banwy Valley at unprecedented level. This has heightened concerns about possible increases in ground water run-off speed from the upland areas affected by these proposals because of interference with the absorption and temporary retention of surface water when large areas of forestry are felled and peat is replaced by concrete, hardstanding and hardcore trackways. The majority of the two sites ultimately drain into the River Severn which already has a dramatic flooding history downstream in England.

## **Landscape and Visual – General**

The A458(T) provides probably the last main route between the Midlands and the Welsh coast which is free of views of wind-farms. On the approach to our area from the east it provides the first significant views of the highest peaks in the southern Snowdonia National Park (Cadair Idris and the Aran ridges). It is also the main access route for local people to and from medical and retail services. Introduction of the northern cluster of turbines(Carnedd Wen) will obscure the main view of Cadair Idris and impose an alien industrial turbine landscape(both developments) in place of the welcoming upland views.

The applicants' photomontages and wire-frame diagrams do not display the real scale of impact, because they are "still" images. It is the rotation of the blades that draws the eye and creates the adverse effect. This adverse impact is enhanced by the number and size of the turbines and by their asynchronous rotation.

## **Landscape and Visual – Carnedd Wen(including the Carnedd Wen 5)**

The northern cluster of 137m. turbines will be built on sites with are typically 350m.-500m. above datum level in immediate proximity to the Snowdonia National Park greatly affecting views from

the southern peaks. For local people, the 80m. anemometer mast and simple visual scaling-up to turbine height provides a more realistic image of the scale of change and damage than the simulations put forward by the applicant.

Removal of the five turbines would provide a welcome but only partial mitigation to selective properties but, in the view of the Council, would do little to mitigate the overall effect. The plateau sides are indented and sloping in many places. As a result, because of the sheer size and number of remaining turbines, the plateau cannot visually "contain" the wind-farm, as the applicant argued, so the turbines will dominate the valley floor where there are the most people to see them (locals and visitors). Views of 20-30 turbines will be common.

### **Landscape and Visual – Carnedd Wen and Llanbrynmair combined**

The two wind-farms are immediately adjacent and could be taken for a single development. The applicants' photomontages confirm this. So each will increase the overall adverse effect of the other from every direction.

Llanbrynmair turbines in their own right will loom over the highly-rated Nant yr Eira valley. However, both developments will have an adverse effect on the popular Glyndwr's Way National Trail, firstly by introducing an alien turbine landscape over a long distance through our area but, more significantly, to the south of our area, will actually straddle the trail which will leave walkers negotiating avenues of turbines instead of enjoying the countryside for which the trail was set up.

### **Economic Effects**

There is no evidence that rural wind-farms bring jobs or economic benefits to the area in which they are located. The Inspector chose to favour a survey (Regeneris) based on windfarms close to the South Wales conurbations rather than the one (Cardiff University Business School) which was based on rural locations. Tourism, after farming and forestry, is a key component of our local economy. Annual "Visit Wales" surveys ("Powys Booster") show that the stunning and varied landscape, rurality and unspoilt tranquillity are the unique selling points for this area. The Cardiff University study found no evidence of additional jobs in rural areas but a net loss in jobs related to tourism and leisure. If these developments are permitted fundamental damage will be done to the sustainability of our area.

### **Electricity Grid Connection – The elephant in the shrubbery !**

Although not strictly material to these applications, neither, if consented and built, would be able to generate 1kW of electricity because there is no grid capacity or infrastructure to take the power out. The local area network is already at saturation, not because of excess demand, only with the output from smaller developments elsewhere in the county. **Therefore, if these projects were to be approved, there would inevitably follow a further planning application to build suitable infrastructure along a 30 mile corridor from the wind-farms into mid-Shropshire solely to connect these two to the existing Grid.** This will involve and impact on a whole range of communities, businesses and individuals who are not directly affected by the wind-farms themselves in addition to cumulative impact on some local Welsh communities who are. It is fundamentally unsound and against all economic and common sense to determine proposals for power stations without taking account of grid connection implications.

### **Conclusion**

**Banwy Community Council feels that great damage will be done to our economy and quality of life if these projects are consented. The benefits of the insignificant quantities of intermittent energy generated from power stations so unsuitably located far from the Grid**

**will be far outweighed by the visual and environmental damage done, the adverse effect on the local economy and the years of pre-construction & construction blight(further protracted planning applications, property issues, deforestation, construction and transport). The Council therefore urges you to reject both developments.**

Yours faithfully,

Clerk to the Community Council

Copy to:

Glyn Davies Esq., MP

Russell George Esq., AM