

To:
Giles Scott
Head of National Infrastructure Consents and Coal Liabilities,
Energy Infrastructure Planning Team,
Department of Business, Energy and Industrial Strategy, (Department of Energy and Climate Change),
Area C 4th Floor,
3 Whitehall Place,
London SW1A 2AW

Reference: Re-Determination letter of 6th July as outlined below.

**ELECTRICITY ACT 1989 & TOWN AND COUNTRY PLANNING ACT 1990
THE ELECTRICITY GENERATING STATIONS AND OVERHEAD LINES (INQUIRIES
PROCEDURE) (ENGLAND AND WALES) RULES 2007**

**RE-DETERMINATION OF THE APPLICATION BY RES UK & IRELAND LIMITED
("RES") DATED 27 MARCH 2009 FOR CONSENT TO CONSTRUCT AND OPERATE
A 100 MW WIND TURBINE GENERATING STATION IN POWYS, MID-WALES
("LLANBRYNMAIR")**

**RE-DETERMINATION OF THE APPLICATION BY RWE NPOWER RENEWABLES
LIMITED ("RWE") DATED 11 DECEMBER 2008 FOR CONSENT TO CONSTRUCT
AND OPERATE A 130-250MW WIND TURBINE GENERATING STATION IN POWYS,
MID-WALES ("CARNEDD WEN")**

Background

Montgomeryshire Against Pylons was formed as a result of the proposed Mid Wales Connection (MWC) and comprises the following Community/Parish Councils and Action Groups along the length of the proposed grid line from Cefn Coch (sub-station) to Lower Frankton (National Grid connection point). The groups are listed as follows -

Bwlch y Cibau and Peniarth Residents Against Windfarm Developments

No Nant y Moch Windfarm

Cefn Croes Action Group

Montgomeryshire Against Pylons and Windfarms

Meifod Community Council

Llansanffraid and Deytheur Community Council

Llansanffraid Action Group against Wind Farms and Pylons

Carreghofa Community Council

Llanymynech Against Pylons Action Group

Shropshire North Against Pylons

Kinnerley Parish Council

West Felton Parish Council

The announcement of the formation of the MWC was met with immense local opposition in March 2011. The groups which came together as Montgomeryshire Against Pylons demonstrated the weight of opposition in May 2011 when over two thousand people went to the Welsh Assembly Senedd to voice their protest at the proposed developments of both windfarms and overhead connections. They also voiced their concerns more locally at the Welshpool Livestock Market where the debate in the Powys County Council chamber was broadcast live. The Council voted almost unanimously to reject the proposed developments.

It was the vigour of the protest movement, in which many thousands of people took part, and which the then Secretary of State for the Environment, the Rt Hon Owen Paterson MP labelled a 'countryside insurrection', that brought this proposed 'abomination' (in the words of Montgomeryshire MP Glyn Davies) to national political and media attention and which also resulted in the election of two MPs in May 2015, Glyn Davies and Chris Davies in Brecon and Radnor, whose total opposition to these proposals was clear and explicit. Russell George AM was also re-elected as a consequence of his emphatic opposition to the Windfarm and connection project.

Montgomeryshire against Pylons was a key part of the Alliance which represented many local opposition groups throughout the course of the Mid Wales Conjoined Public Enquiry.

Landscape

We believe that the then Secretary of State's original decision statements were that it would take far too long to evaluate the eventual environmental 'benefits' of replacing conifer woods on Carnedd Wen, for example, with windfarms. As we understand it, she was referring to the benefits when the windfarms reach the end of their natural cycle and are removed – some 25 years after being built – which is a very long time indeed. The developers, wilfully or not, have instead taken this to mean the environmental benefits of their mitigation measures, restoring peat bogs etc (but see below) which should show in just two or three years. As we understand it, they are therefore claiming that their evidence was not taken into account, and indeed that they could not rebut the Secretary of State's claim about the impact. But she was quite rightly not making the point about the immediate short-term mitigation measures but the longer term – 25 years – justifiably because it is much too far away for an assessment to be possible.

We agree with the Secretary of State's decision that the impact on landscape can only be judged once the turbines have been implemented and then removed 25 years later.

The Inspector has provided what we consider to be an entirely subjective view in his report that giant turbines were in fact preferable to forests as landscape features on environmental grounds. This compares starkly with the controversy surrounding conifer forests in Wales (as in Scotland and uplands in England) for the past century. Although the plantations have been vigorously defended, over that period, particularly by the Forestry Commission, responsible for many of them, as essential to national self-sufficiency in timber, as environmentally enhancing and as carbon absorbing, the argument has begun to swing against them because of their somewhat uniform slab-like appearance, to which the Inspector makes reference but which, importantly always follows the contours of the landscape in direct contrast to the proliferation of numerous turbines.

To argue that chopping down hundreds of trees and replacing them with giant man-made industrial structures towering over the landscape at three or four times the height of the trees would be an improvement to the landscape is, we submit, a misplaced understanding. The combined impact of these large and incongruous structures on the mid Wales landscape would damage what is the area's major asset – the beauty of its unspoilt uplands which are enjoyed by people both locally but importantly from further afield. The local tourist industry relies on people from the West Midlands and Greater Manchester conurbations who come to enjoy the unspoilt vistas and the pastimes that these can offer.

The views from important areas such as Plynlimon and Snowdonia National Park will be impacted adversely by the imposition of such structures on the upland landscape and whilst this has been downplayed by the developers the cumulative effect on landscape must be considered in any decision.

Environment

We maintain our view that the proposed environmental mitigation measures – the restoration of peat bogs in place of the chopped down forests – are flawed. It takes thousands of years to create a peat bog – the tree-razed desert around the wind turbines would be merely scrubby moorland. The Inquiry heard considerable evidence as to the carbon-negative effect of felling forests to replace them with barren, denuded soil (as you would expect). We maintain that this was insufficiently outlined in the Inspector's report

The developers asserted that felling substantial areas of woodland would reduce the risk of flooding downhill and downstream. This is a very important issue for communities further down the regularly flooded Vyrnwy and Severn valleys all the way through to towns like Shrewsbury, Bewdley and Tewkesbury. The impact upon water courses of substantial areas of concrete being inserted in the ground amid some of the highest rainwater catchment areas in Britain is insufficiently studied. But in the wake of the severity and increases in recent flooding nationally, the government itself is now recommending the planting of more (not felling, not fewer) trees in upland areas – a 'catchment-based' approach in the words of Cabinet Office minister Oliver Letwin – to reduce the risk of flooding because ground water is absorbed through the roots, stored in the trees, and then evaporates through the canopy.

Mid Wales Connection

The Mid Wales Connection should be seen as part of the cumulative impact of the wind farm developments. It was accepted that the applications which formed the Conjoined Inquiry would trigger the need for a 400kV overhead line from Cefn Coch to Lower Frankton in Shropshire. Despite requests to the contrary, the impact of the line was not considered in the Inquiry but we respectfully remain of the view that the line is an intrinsic part of this development and, as such, both the landscape and environmental effect of it should have been considered within the planning process.

The environmental impact and the effects upon landscape of this line have been rehearsed elsewhere and it is not intended to repeat them. Suffice to say, the effects on the natural and

historic landscape and environment of the proposed corridor are substantial and outweigh the benefits of the amount of energy that may be transported over these cables.

Alliance

We are an affiliated member of the Alliance that made the case against the developments at the Conjoined Public Inquiry. We have had close contact with the group resulting from Mr Giles Scott's letter of the 6th July 2016 and as they are making representations to that letter separately we fully support the representations made by them rather than duplicate the issues raised therein.

Rule 23(1)(b)

We do not ask to re-open the Inquiry.

Conclusion

We ask that the Secretary of State upholds the original decision to refuse permission for the Wind Farm developments of Llanbrynmair and Carnedd Wen.

Sent on behalf of Montgomeryshire Against Pylons

Dated 29.07.2016