



## Ymgyrch Diogelu Cymru Wledig

### Campaign for the Protection of Rural Wales

#### Montgomeryshire and Brecon & Radnorshire Branches

**Re-Determination of the application by RES UK & Ireland Ltd dated 27th March 2009 for consent to construct and operate a 100MW wind turbine generating station in Powys LLANBRYNMAIR**

**and application by RWE NPOWER Renewables Ltd dated 11 December 2008 for consent to construct and operate a 1030 -259MW windturbine generating station in Powys CARNEDD WEN**

CPRW Montgomeryshire and Brecon & Radnorshire Branches welcome the opportunity to comment on the re - determination of the Llanbrynmair and Carnedd Wen windfarms. CPRW seeks to promote the enjoyment and sustainable development of rural areas in a manner that preserves the qualities of our outstanding landscapes and promotes rural life and livelihoods. The Branches represent some 380 members who have considerable concerns regarding the impact of the proposals for multiple windfarms on North Powys uplands.

We would make some general points regarding both the windfarms proposed for the Llanbrynmair Moors following our perusal of Inspector Poulter's Report and also wish to draw to your attention policy changes that have been implemented since the Conjoined Public Inquiry. We are grateful for your consideration of these issues.

1. CPRW are concerned that although the Inspector's Report demonstrates a detailed analysis of relevant issues for the three windfarms and transmission line proposed for SSA C and weighs these fully in the planning balance to reach conclusions supported by evidence, application of relevant material planning considerations for SSA B is, at best, cursory, has scant regard for evidence and is notable for a paucity of analysis.
2. Based on the available evidence the ability of either habitat restoration project to mitigate for the impact on ecology and landscape of these immense schemes is highly unlikely but the Inspector appears to give undue weight to perceived 'benefits' from the proposed Carnedd Wen restoration project. It was clear from evidence presented from all parties at the CPI that doubt remains as to the effectiveness of the methodology in achieving the desired environmental outcomes in terms of ecology or landscape. Also evident was the unreliability of the various and complex site management plans working co-operatively to maintain the integrity of this fragile ecosystem and its special character. A better outcome in carbon, biodiversity and landscape terms is likely to be achieved through continuing with the sustainable commercial management of the forest. Current practice dictates that following extraction any replanting must be less angular and in sympathy with the topography and employ mixed planting and marginal habitats in particular thus creating improved visual and ecological effects. The forestry and timber industry is a major and important employer in Powys.

3. There is a requirement in planning to take account of potential environmental limits to ensure that resources are not irrecoverably depleted or the environment irreversibly damaged. CPRW would maintain that a development of this scale and nature in the fragile ecosystem of the Llanbrynmair moorland would exceed the capacity of the environment to accept man made change and the damage caused could indeed be such as to be irreversible and would not be sufficiently mitigated through an unproven and short-lived (in terms of a peatland ecosystem) restoration project.
4. The nature of the upland pene-plain landscape and size of the turbines would render 30 - 80 machines visible over very considerable distances. They would be prominent and even dominant in important and much enjoyed views from the Kerry Ridgeway, the Arans and the Wynford Vaughan Thomas memorial for example. Glyndwr's Way, a National Trail of local and tourism importance would be overwhelmingly affected. Although the scale of impact is very evident from RWE and RES wireframes and photomontages, landscape considerations were given little weight by the Inspector. CPRW would also draw to the attention of the Secretary of State that this landscape was considered sufficiently dramatic and characteristic as to be assessed by Hobhouse (1947 report) as worthy of particular conservation as a National Park or AONB. That the Montgomeryshire uplands have not been afforded such protection is seen as deplorable by the local CPRW branches.
5. CPRW consider the benefit in visual terms of removing the turbines described as the Carnedd Wen Five that 'spill over' into the Banwy Valley, as of little consequence in the immensity of the scheme and in no way render it acceptable.
6. The smaller fields and hedgerows of the Llanerfyl Mosaic Landscape Character Area and the Nant yr Eira valley, would have their setting entirely dominated by the massive turbines. This is not a landscape any more capable of accepting turbines than at Llanbadarn Fynydd where the windfarm proposal was rightly rejected on landscape grounds. Such contradictions serve to flag up the many inconsistencies in analysis and weighting of the planning balance for SSA B.
7. The impact on rural residents and small businesses in the Carnedd Wen and Llanbrynmair area was not taken into account in the planning balance either in terms of the built windfarm or the almost unimaginable scale of disruption during some 7 years of construction activity and long periods of intense clear felling.
8. There is no evidence from existing rural windfarms in Wales of any real economic benefit accruing to the local community outside that of rental paid to landowners. Permanent employment opportunities are very few and studies show that community benefits are not an economic driver.
9. CPRW contributed evidence and expertise on landscape and rural issues as part of the Party 6 Alliance at the CPI. We note with concern the scant mention given to any of the detailed research presented and the repeated assertion that the Alliance offered no evidence to support their case. We maintain that all evidence, particularly where backed by local knowledge, should be properly scrutinised as being as valid as that of witnesses hired by developers to make a commercial case.

#### **Recent Policy Changes**

There have been a number of recent legislative changes post- dating the CPI. Although this application is determined at UK government level we understand that regard has to be given to Welsh legislation in the overall balance.

1. The Welsh Heritage Act (2016) increases the requirement to conserve the rich culture and heritage of Wales and requires that special consideration be given to both fabric and setting of both nationally designated and non-scheduled monuments. The Llanbrynmair moors exhibit a plethora of scheduled ancient monuments with a likely degree of inter-relationship. The severe impact on the setting of a number of SAMs needs to be a factor in the planning balance.

2. TAN24 provides guidance as to implementation of the WHA through para 1.10-1.12 which requires full recognition of all the various heritage values of the site including Communal value (para 1.10 - 1.12) and there is a requirement to undertake a comprehensive Heritage Impact Assessment in relation to the SAMs (para 1.15). There is also a requirement to ascribe greater relevance to the impacts of a development on the setting of features of historic importance (para 1.22).
3. The Environment Act (2016) Wales sets out a series of Principles based on every ecosystem producing a range of services which in turn have wide ranging and important public benefits. The value of public amenity is one that cannot be over emphasised and is further enshrined in the innovative Well Being of Future Generations Act (2015). The Environment Act is designed to ensure that ecosystem resources are optimized whilst at the same time retaining their long term integrity and resilience and hence ability to continue to produce the services which the nation relies upon. It is incumbent upon decision makers that they should fully understand the value of all ecosystems in a particular area and implement procedures to ensure they are managed in an integrated manner. Without such an understanding of the ecosystems and the 'services' they offer the impact of changes cannot be properly assessed. CPRW finds little, if anything, in the ES information which would enable a decision maker to ascertain if or how this approach has been taken into account. It is not sufficient to simply assess the 'existence value' of a particular feature or asset be it a bird, a monument or a view, rather than the extent / degree of public benefit it provides. There is a necessity to take a holistic approach to the value of the environment and the overall impact of any proposal rather than the traditional compartmentalisation approach. This is again a methodology embodied in the Well Being of Future Generations Act.
4. Revisions of Planning Policy Wales have been undertaken to assist with embedding the Well Being of Future Generations Act including PPW Chapter 4 Planning for Sustainability with a requirement to 'manage the use and development of land in the public interest in a way which is consistent with key sustainability principles and key policy objectives' in order to 'contribute positively to the achievement of the Well-being goals' (para 4.2.1).' PPW also unequivocally states the intention of 'Putting people, and their quality of life now and in the future, at the centre of decision making' (para 4.3.1). The policy imperative to balance the public interest to development is clear.
5. The UK government has taken a number of initiatives to embed localism into the planning decision making process including the requirement for considerable weight to be given to local opinion. Public objection to these two schemes was, and remains, overwhelming. This was fully recognised by the Inspector in his report but given no weight at all in the planning balance. CPRW members would respectfully request that the Secretary of State give due regard to the necessity for public support for schemes in areas impacted and the local democratic process. Not only the impact of the windfarms per se needs to be considered but also the highly disruptive, protracted construction period and the requirement for an extensive transmission infrastructure.

