

From: Iain Aitken [mailto:████████████████████]
Sent: 17 December 2014 12:50
To: MYG
Cc: MYG
Subject: Submission re proposed wind farm development at Mynydd y Gwynt

Dear Sirs

As discussed with Case Officer James Bunten (email 5th November last) I set out below my submission with respect to this application.

Please acknowledge receipt.

Regards

Margaret Tregear

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Objection to Mynydd y Gwynt Wind Farm
Reference EN010020

1. **TAN8:** This development is outside an SSA. The objective of TAN 8 is to confine wind developments to the SSAs identified and avoid proliferation across Wales as a whole. This is so important for Wales, where for many rural residents quality of landscape is key to livelihood. On the grounds of non-compliance with TAN8 alone this application should be refused.
2. **Landscape Impact:** There are few wild places left. Plynylmon is an iconic landscape within Wales and a popular destination for many visitors. The outstanding scenery is recognised by the Landmap designations of local aspect areas. This development both on its own and in cumulation with other local operating and proposed developments would have a huge impact on the landscape for tens of miles around the site.
3. **Grid Connection:** The development should not be considered in isolation from the associated grid connection. These should be viewed as one development for the purposes of assessment of impacts. To do anything other is potentially to significantly downplay the impacts of the development as a whole.

4. **Pumlumon Project:** Plynlymon is the site of a major conservation and regeneration project of national importance, which has potential to impact the wider region. The proposed development site lies within the boundary of the 'Pumlumon Project' and seriously threatens the objectives of this project i.e. carbon storage, reconnecting habitats, storing flood waters, bringing back wildlife, changing grazing patterns, recreating habitats, developing green tourism and involving communities.

"Established in 2007, the Pumlumon Project is a radical rethink of how the landscapes of upland Britain could work. Across 40,000 hectares of the Cambrian Mountains, we're pioneering an upland economy built around wildlife, ecology and long-term sustainability.

Our method is simple: if we can help local farmers, foresters and tourism businesses to do things a little differently, then over time the whole landscape comes back to life. And once that happens, the benefits extend far outside the project area."

<http://www.montwt.co.uk/what-we-do/living-landscapes/pumlumon-project>

The proposed development is incompatible with this important project, supported by both Natural Resources Wales and the Welsh Government, which has the potential to guide and shape sustainable policies for uplands across the UK.

5. **CO2 & peat:** Peat is a natural carbon store, but releases carbon dioxide when disturbed. The saving of CO2 emissions appears to be the only justification for investment in an unreliable and intermittent energy source such as wind. It makes no sense at all to very seriously disrupt a natural CO2 storage system in the name of reducing CO2 emissions.
6. **Water contamination:** Research (<http://scotlandagainstspin.org/2014/08/windfarms-water-smoking-gun/>) has been conducted this year in Scotland on the real risk of water contamination resulting from wind farm development, expressing particular concern on the consequences of industrialising water catchment areas. This site is within a nationally important catchment area. This research has major implications for the proposed development and the potential for contamination of the headwaters of the Wye.
7. **Tourism:** My first experience of this spectacular mountain scenery was on the final days of a four day ride from the Black Mountains to the Irish Sea, journeying through progressively wilder landscapes (and across the wind farm site). The long established family business in the Black Mountains which organises this ride attracts guests from around the world as well as all parts of the UK, and the unspoiled beauty of the landscape and the horse-friendly routes is a major part of the attraction. Lose this, and visitors can and will take their pick of

any number of alternative destinations. The ZTV makes it clear this windfarm would be dominant in the landscape for much of two days of the ride. This is not what people travel to Wales to see. There are several such trail riding businesses attracting riders to mid Wales and the Cambrian Mountains, including Plynylmon. This type of business in turn supports numerous other local tourism businesses, including pubs, hotels, B&Bs which also stand to lose if visitors are deterred. Rural businesses are often run on tight margins and cannot afford even a small reduction of income.

All local tourism is similarly based on the attraction of the landscape for outdoor activities – there are no other major tourist attractions. Degradation of the landscape jeopardises this critical source of local revenues. To quote Ceredigion Council's 'Tourism & Visitor Economy Strategy for Ceredigion 2011- 2020':

"Tourism (the visitor economy) has an important part to play in contributing to local prosperity and quality of life in Ceredigion. The County needs to pursue tourism because, first, this is where its natural comparative advantage lies and, second, there are few alternative sectors for the County given the uncertainties surrounding public sector employment and agriculture, the other mainstays of a somewhat fragile economy in the County. Tourism already supports a significant number of jobs and injects much needed revenue into the local economy. It also supports the development of vital infrastructure and other economic activities."

<http://www.ceredigion.gov.uk/public-it/tourism/stats/certwg/CEREDIGION%20TOURISM%20STRATEGY%202011-2020.pdf>

A survey undertaken by the Scottish Mountaineering Council earlier this year reached conclusions which are very relevant here:

"This survey provides clear evidence that mountain-goers do not want to pursue their activity, and spend their money, in areas they regard as spoiled by industrial-scale wind farms. They are changing their behaviour to avoid such areas, and sometimes Scotland altogether. This is consistent with a trend shown in other surveys showing a rising trend in discouraged visitors."

http://www.mcofs.org.uk/assets/pdfs/mcofs-wind-farm-survey-report_2014.pdf

Others have already pointed out 1. the failure to observe guidelines in terms of distances from rights of way including bridleways, and 2. the extent of public access land and the number of rights of way, including major regional & national routes, which will be severely impacted by this development both on its own and in cumulation with existing wind developments and potential development within Nant y Moch SSA.

8. **Diminishing returns:** The more wind energy capacity that is introduced into the National Grid, the more inefficient is its integration. Virtually equivalent conventional capacity is required in order to meet demand when wind energy production is low. Conventional power sources which are required to power down at times of high wind energy production do not operate to maximum efficiency and have increased CO2 emissions. UK energy security interests are not served by investment (by way of subsidy) in further wind capacity where reliable conventional sources are what is required. All investment has an opportunity cost – what is spent on A cannot also be spent on B. Failures by successive governments to invest in conventional energy sources have brought us to a situation where we are keeping the lights on by requiring industry to curb or cease production at peak times - a situation almost beyond parody. Developments such as this are not the answer.
9. **Decommissioning:** Wind developers are prone to making statements such as that wind development is temporary and removable. In practice, 25 years is a generation, so hardly temporary. Even supposing there were no new application for the same site, claims that landscape can be restored are misleading according to Scottish Natural Heritage:

“Research commissioned by Scottish National Heritage (SNH) found that removing the reinforced concrete could cause more environmental damage than leaving the bases where they are.

Although the structures could be covered up with topsoil and pose a “relatively low” environmental risk, the report warned some may be susceptible to “oxidising and subsequent staining/contamination.”

Detailing the method for removing old turbines, the 112-page report said this required cranes, excavators, dump and tipper trucks, along with a hydraulic breaker or explosives to remove the base. The study said wind farm companies could also decide to leave behind access tracks, cabling and pads on which the cranes are erected for stability if these are considered too damaging to dismantle.”

(<http://www.telegraph.co.uk/news/uknews/scotland/10142126/Old-wind-farms-bases-could-be-left-in-countryside.html> & <http://www.snh.gov.uk/publications-data-and-research/publications/search-the-catalogue/publication-detail/?id=2007>)

In other words the damage once done is not reparable.

It is impossible to reach any conclusion other than that the harms associated with this development, which would be felt both in the immediate locality and further afield, would entirely outweigh any perceived benefits.