

Examining Authority's First Written Questions

Ramblers Cymru, Powys Area and Aberystwyth Group of the Ramblers

Contact: John Morgan 01970 832525 [REDACTED]

Q 1.16

We consider an almost absolute weight should be accorded to TAN 8 and its Strategic Search Areas. The Welsh Government in its letter of 13th November to the Planning Inspectorate emphasises that the application area is outside TAN 8. The Welsh Government only recently confirmed that it had no proposal to change TAN 8. This in effect confirms Welsh Government Policy subsequently to the documents quoted.

The relevant parts of TAN 8 are:

- Page 6, Paragraph 2.13 - "Most areas outside SSAs should remain free of large wind power schemes".
- Page 63, Annex D, Paragraph 8.4 – "In the rest of Wales outside the SSAs, the implicit objective is to maintain the landscape character i.e. no significant change in landscape character from wind turbine development".

In respect of paragraph 2.13 of TAN 8, with the word 'most' in mind, our written submission examines the arguments the Developer puts forward for inclusion as an extension of TAN 8. It is clear that there is no sensible or legal reason, against the criteria given in TAN 8, why the area should be included as an addition to the SSA D. Amongst the reasons are that the decision is that of the local authority who have almost complete discretion in arriving at a decision in such a matter.

In respect of para. 8.4 it is an important principle in the Welsh policy context and other contexts that large scale wind turbine projects are limited to the SSAs. The whole of Welsh Policy is based on this principle and it was not arrived at lightly. This principle emerged early in the initial Arup investigation which underlies TAN 8. Part 1 of that Arup Report describes the discussions with a range of stakeholders after which the principle emerged.

Several wind turbine projects have already approved within TAN 8 areas. It is not unreasonable to think that they might not have been put forward for development without the encouragement of TAN 8 and it might well be – or at least the public will so consider – that they have been approved because they are within a TAN 8 area. To depart from TAN 8 at this stage, without a democratically based Welsh Government decision and without the broad consultation which took place on TAN 8, would be an issue of great public concern.

Ramblers Cymru, Powys Area and Aberystwyth Group of the Ramblers

Contact: John Morgan 01970 832525 [REDACTED]

Q 1.17

The answer to the applicant's contention lies in the Welsh Government's letter of 11th November which clearly states that the application is not within the TAN 8 policy as far as SSA's is concerned. The letter in effect states that the TAN 8 policy is a strict one, contrary to the applicant's interpretation.

Examining Authority's First Written Questions

Ramblers Cymru, Powys Area and Aberystwyth Group of the Ramblers

Contact: John Morgan 01970 832525 [REDACTED]

Q. 1.18

It is clear from the Welsh Government letter of 13th that TAN 8 does seek to restrict development outside SSAs, contrary to the applicants claim.

Q 2.14

It is possible that the viewpoints analysed are representative of the main landscape 'character types'. At the time of writing we are not sure as to the meaning of 'visual receptors'. What we think is that photographs and computer modelling do not represent the real life intrusion of turbines into landscape views. Static viewpoints do not adequately represent the continuing sequential impact of turbines on the walking public.

Q. 2.19

We know of no objective surveys of the use of upland public rights of way

It is fully accepted that the intensity of use of footpaths in the area is less than those for Snowdon and Cader Idris but that applies to the vast majority of footpaths in Wales. It is not a statistic which is useful in assessing this application.

For the walking public the most important landscape affected is that of the Pumlumon ridge. It is walked for its views and because it is the iconic mountain of Mid Wales, mentioned in the Mabinogion and notable also for George Borrow's descriptions of the locality in his now classic book 'Wild Wales'. (circa 1855). The Cambrian Way is given prominence in the question but that trail merely happens to follow one of the previously established and well used routes up Pumlumon. The car park at the foot of one of the ascents, at Eisteddfa Gurig, seems to be quite popular even though there is a charge of £5 a day. (Our members do not use it!)

We do not claim that the footpaths are well used but the Wye Valley trail is advertised as such and though we have no statistics to go on we do wonder whether the intensity of use quoted, 3 people per day, is all that unusual. Sections of the Welsh Coastal Path might approach that figure. We say in our written representation:

"It is being implied in the Environmental Statement that the designated walking routes and other public rights of way across and in the vicinity of the application site are of less importance because of relatively low use. We reject any such suggestion, which has no basis in local or national policy. Pumlumon is one of the wildest and remotest upland areas south of the Scottish border. It is precisely that quality which makes the mountain so special and which adds so much to the value of the walking environment."

Examining Authority's First Written Questions

Ramblers Cymru, Powys Area and Aberystwyth Group of the Ramblers

Contact: John Morgan 01970 832525 

.Q 2.20

Though we do not represent the riding fraternity it seems very doubtful to us that the measure of providing a car park is any worthwhile compensation for the effects of turbines on the enjoyment of riders. Even if there is a parking area required in that vicinity there are other possible alternatives to be explored short of accepting a turbine development.

As walkers we park in that car park without hindrance.

We have heard of injuries to walkers from wind turbines. The main danger appears to be from ice thrown from turbine blades. At one time there was a notice at the entrance to the Cefn Croes turbines warning of the danger of ice. It may still be there but we have not been able to check it for the answering of this question.