

## BHS Written Representation on Mynydd y Gwynt Wind Farm.

British Horse Society has a membership in excess of 78,000 and seeks to promote, protect and extend Safe Off Road Riding for all equestrians. To this end BHS access representatives consult with developers of wind farms and object where turbines or other elements of the project impinge on bridleways. I will deal with the nature and extent of the problems encountered by equestrians from wind farms in my answers to the Inspector's First Questions.

I attended an exhibition for this wind farm and discussed the BHS position but to no effect. Two turbines are within 125m, topple height and less than that specified as the minimum in TAN8. Two more are within 200m. That is the original separation recommended by BHS, since revised to three times height due to the increasing size of turbines. This amended recommendation is supported by the findings of Inspector Alwyn Nixon in the unsuccessful appeal at Pentre Tump. He cited the impact of 110m high turbines on RoW as being one reason for denying the appeal despite an alternative route 265m from the turbine. That proposal was also outside an SSA but unlike Pentre Tump no alternative routes are offered in this application. (Ref. APP/T6850/A/13/2198831 paras 19-26)

The offer of a horse box parking area beside the A44 is of limited use as it is on the wrong side of the road for the bridleway and the proximity of turbines to the bridleways would be a deterrent to many users. I have spoken to the developer's representative who stated that with sight lines to the turbines of over 1km horses would become accustomed to the machines as they approached. If it were that simple we would all be training classics winners in a spare afternoon. As anyone who has spent time with horses will know this is simply not the case. There is already a parking and picnic area in the Hafren Forest which is well used. Riders can start from there and ride the bridleways which go into the application site. They also have use of the forest tracks under the Concordat between BHS and NRW

The developer offers camera evidence of low to no use of the bridleways in the site. From the east BW48 passes through a recent area of clear fell where machinery was still operating in early November. There are then barriers too narrow for horses, thigh high gorse with the added deterrent of partly hidden discarded old pallets. The route is next blocked by a bog at the gate leaving the forestry. The gate is also tied with strong rope which would need cutting open. Low use of this BW is, therefore, not surprising. In Wales money for maintaining RoW is apportioned to Local Authorities on a per capita basis. Powys has a low population but over 25% of all Wales's RoW. That is about 9,500km. Consequently historically and current RoW maintenance in the county is under funded and many routes are unavailable.

The Powys ROWIP showed that Circular routes were most in demand. Given that BW49 would form part of a circular route from a recognised facility I am sure that I, by working hands on with other volunteers in conjunction with NRW and Countryside Services, could rectify the situation in this case. We would then have an open route offering a contrast between forest and open hill riding.

The current proposed position of T13 within 125m and T14 within 200m of BW49 would be detrimental to equestrian use of this route. T9 is well within the current BHS recommended separation distance and within the 256m separation offered by the alternative route at Pentre

Tump and rejected by Inspector Nixon. Similarly T1 within 125m and T4 within 200m would deter use of BW 48 affecting users from both the south and from the Hafren Forest. The RoW Buffer Map MyG Fig8 10b is therefore no such thing, as buffers, whether BHS recommended or TAN 8 advice, are ignored for BWs and FPs alike.

Annex C para 2.25 TAN8 “It is advisable to set back all turbines a minimum distance, equivalent to the tip height, from the edge of any public highway (road or other public right of way) or railway line.”

I note that the BHS promoted trail, The Prince Llewelyn Ride, is omitted from the trails listed in the application. This 80 mile route across Wales from Knucklas to Borth passes on BW112 within 750m of the nearest turbine. It is ironic that this route, chosen to avoid those wind farms present at the time, has proved to be like a magnet for proposed developments with five along or across its length. If all were to be built using this ride will be like taking the “Turbine Tour”. Riders starting out from one venue alone, Brandy House in Beguildy generate eleven bed nights there and that would be multiplied up by the number of days, typically four, that it takes to complete the trail. In the Hafren Forest the route is down wind of the wind farm and from my recent visit I know that activity within the site and further west is clearly audible. The sound of shooting carried 3km to the Picnic Area and all the turbines would be far closer to BW112 than that. Experience here in Pennant indicates that the turbines on Trannon, 3km to the east, have become noisier over the twenty or so years since installation. Noise would be even more noticeable on the bridleways within the site and be noticeable through out much of the Hafren Forest which is used by riders, cyclists on the well used Cycle Route 8 and all visitors to the Picnic Site facilities and associated walks. The appearance of and noise from the proposed turbines is unlikely to encourage any of these peaceful activities, in fact rather the reverse.

Given the likely impact of the development on the surrounding area, activities and businesses it must be considered whether it is worthwhile especially since the site is outside any SSA. The Welsh Government considered that the refined SSAs afforded sufficient opportunity for Wales to meet its renewable energy target for wind. If they had wanted to include this site they would have done so. The developer maintains that confusion over LFZs meant this area was left out of SSA D. The situation over LFZs at Llaithddu and Hirddwywell was clarified with the MoD so that those areas could be cleared for planning as early as 2008 so presumably any similar misunderstanding could have been dealt with in similar manner here.

To move on to the Design and Access Statement, MyG-AD-11.

The developers claim they have set out to maximise the available wind power yet the Whitlee, Glasgow, web site gives the following information.

“The turbines are positioned in rows to make sure they get the maximum benefit of the wind. In each row the turbines are spaced five times their height apart. There is also a distance of three times the turbines height between the rows.”

To achieve that these turbines should be 625m x 375m apart when on plan many are less than 500m x 300m apart. That considerable difference in what would be considered efficient by the two schemes calls in question the Mynydd y Gwynt claim and suggests that they fail in the second of their Technical Objectives in para 17, “adequate separation between

turbines to minimise wake effects and hence maximise generation.”

At line 4 of the Environmental Objectives para 17 they claim to be “minimising the impact to existing land uses (land and amenity). Anyone enjoying the countryside both within and around the site will notice considerable impact both visual and audible.

Paras 46 to 48 & 50 make no reference to bridleways or equestrians. Some horses are affected by turbines and since riders are limited to bridleways and these pass close to turbines there must be an effect on equestrians. In addition in my experience on Trannon I have found it very difficult to pass near the descending blades of those turbines without flinching. Close proximity to turbines is intimidating which is part of the reason for the separation advice embodied in TAN8 so there will be an effect on recreational users.

This proposal is outside any SSA, likely to be less than efficient, ignores TAN 8 advice and does not adequately consider the needs of the general public enjoying the benefits of the countryside. I ask that it be turned down.