

**From:** John Evans [mailto: ]  
**Sent:** 18 January 2015 05:20  
**To:** MYG  
**Subject:** Comments on WRs, responses to comments on RRs and comments on responses to the ExA's first written questions.

**Please find enclosed the comments of Ceredigion County Council.**

**Planning Inspectorate's Reference Number: EN010020**  
**Ceredigion County Council's Reference Number: 10030028**

**Comments on WRs, responses to comments on RRs and comments on responses to the ExA's first written questions.**

**Aaron and Partners comments on relevant representations.**

1. Policy. Framptons Town and Country Planning.

At the time of publication of TAN 8 in 2005 the largest turbines were 2MW in size. The industry has moved on and the Repower 6M series is a 6.15MW onshore/offshore turbine which is currently the largest commercial wind turbine available and this should be borne in mind when the indicative capacity of SSAs are being considered. The Ceredigion LDP recognises that the indicative capacity of SSAD may be easily met or exceeded by the refined area - a fact accepted by the Inspector at the LDP Inquiry.

In terms of Welsh Government Policy the material considerations are Planning Policy Wales, TAN 8 and Policy Clarification letters which are either issued by the First Minister or by Planning Division. Individual Ministerial Statements do not constitute policy clarification letters and therefore carry little or no weight in the context of Welsh Government Policy, however, the Ministerial letter of July 2011 sets out Welsh Government policy and this is confirmed by the Welsh Government in their response.

"Our approach is to limit the development of large scale wind farms to the areas of Wales which were independently and empirically assessed to be the most suitable.

..... we expect all decision makers in Wales, including the IPC and its successor, to recognise our spatially specific policy outlined in TAN 8 and to respect the fact that the Strategic Search Areas have a finite environmental capacity and output should not exceed the maximum levels as assessed in 2005 and outlined above".

John Griffiths AC / AM Gweinidog yr Amgylchedd a Datblygu Cynaliadwy Minister for Environment and Sustainable Development. July 2011.

Statements made by Ministers, whether they be portfolio holders or the First Minister do not alter Welsh Government Policy unless they are formal policy clarification letters.

There has been a shift in the UK approach in terms of CO2 reduction from reliance on renewables to other forms of carbon reduction to meet 2030 targets and beyond.

5. Landscape. Ann Priscott Associates.

Cultural Heritage. Notwithstanding the fact that the impact of the development on historic landscape has been underplayed in the opinion of the County Council, the mitigation indicated by the applicant in terms of the impact is the fact that the development is reversible.

No other mitigation is possible. The view of the Council is that the damage caused to the historic landscape over a period of 25 years would be substantial, and, in reality, unless economics prevents the repowering of the site, there is the prospect of the site being used in perpetuity. The use of the reversibility argument in mitigation for the detrimental impact on the historic landscape is not one which the County Council considers should carry significant weight.

Applicants response to ExA's first questions.

Question 2.1 - response confirms that no consultation took place with CCC on the scope of the LVIA therefore consultation was incomplete. Whilst the targeting of the consultation may be said to have been adequately managed, from the County Council's point of view, it may be said that the burden of consultation was underwhelming. Ceredigion was unaware of any meetings between the applicant and Powys/ NRW or any of the main consultees. Ceredigion did not have any face to face meetings with the applicants and none were proposed. Ceredigion did not receive any preliminary details, in particular on the landscape and visual impacts of the proposal, to allow comment prior to the publication of the draft ES.

Question 2.2 - assessment of the study area to the west and south west is conspicuous by its absence there would potentially be cumulative effects. The County Council would refer the ExA to paragraphs 4.36 to 4.38 of the Ceredigion LIR.

Mynydd y Gwynt Written reps - summary of case. Peter J Frampton

The summary of case refers to a speech made by Ed Davey, the Secretary of State, to Renewables UK on the 13th November 2014.

The speech was made in the run up to a general election and was made to the industry. It is not surprising that the speech was supportive, however, the critical aspect of the speech from the County Council's point of view were the Secretary of States comments on the electricity bill payer:

"But you have to remember, my job is to look after the electricity bill payer, just as much as it is to bring on vital new renewables.

So it is a balance. Not every project will get through. Indeed, not every renewables proposal will be appropriately sited. It is right that some are turned down.

Newspapers may write about offshore wind projects being dropped, for example, as if something is going wrong. But we never envisaged or indeed wanted every project to succeed.

For there is no bottomless pit of bill payer support for low carbon. Setting a budget – as the UK has done – forces an ever greater focus on cost"

The emphasis on cost is a reflection of the Secretary of States written statement setting out the UK's negotiating position on the EU2013 Climate and Energy Framework referred to at Ceredigion's LIR at paragraph 2.3.

It is the County Council's view that the Mynydd y Gwynt windfarm is not appropriately sited and that it should not "get through" and that it would be right to turn the application down.

Anne Priscott

3.10 The Design and Access Statement does not record the iterative process - the design process went through 8 iterations according to the applicant and these have not been recorded in the ES or the Design and Access Statement.

3.33 In describing the receiving landscape Ms Priscott states:

"The site is not immediately adjacent to Area D. The ridge of high ground along the Plynlimon ridge creates a very strong perceptual and physical barrier between the land within Nant y Moch to the west and the upper reaches of the Wye Valley to the east".

This confirms the County Council's view that the application site is not immediately adjacent to SSAD and that the Plynlimon ridge is an absolute constraint to development to the east because of it being such a strong perceptual and physical barrier.

18th January 2015.

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