

National Infrastructure Planning
Application by Mynydd y Gwynt Ltd
Reference EN010020

**Comments on representations
from Mynydd y Gwynt Ltd**

from

The Cambrian Mountains Society (CMS)
ID 10029997

Response to Mynydd y Gwynt Written Representations

19th January 2015

Introduction

These and subsequent comments are written in short notation to ease reference and are confined to material submitted by the applicants, (abbreviated to MyG Ltd) avoiding where possible repeat references to the Cambrian Mountains Society's already submitted Representations. Following the procedure already adopted by the Examining Authority's detailed schedule of subsequent questions, further clarification or responses to points not covered can be dealt with in that format at the appropriate stage. As requested in the Examining Authority's Timetable, the present text follows the chronological sequence of:

- 1 Comments on Written Representations by MyG Ltd
- 2 Responses to MyG's Comments on Relevant Representations
- 3 Comments on the response by MyG to ExA's first written questions

1 Comments on Written Representations (WRs)

1.1 Planning (Part 2 - Peter Frampton)

2.40 - 2.62

TAN8 remains substantially unmodified and continues as the only stated spatial policy guidance for locating strategic wind power schemes in Wales.

2.63 - 2.97

References to planning applications above 50MW being 'entertained' demonstrates that there is an unresolved policy conflict between the Wales and Westminster governments and between TAN8 and UK aspirations. It does not however imply that the conflict has in any way been resolved because no such applications have in the past been brought to the point of decision. Hence the phrase used as far back as 2011 in Committee (but not in any subsequent Ministerial Statement - with a capital S) by the First Minister that TAN 8 is no longer relevant is clearly related to the perspective of the UK government. It is made clear (2.70) that his view was that this is *'the wrong approach'*. Therefore the item 1 at 2.78 (ii) on page 37 that *'The First Minister considers that TAN 8 is no longer relevant to planning considerations for projects over 50MW'* appears simplistic, inaccurate and misleading. Had that legally and literally been the case it is astonishing and revealing that until this case no such applications have come to decision point or been approved in the last four years.

1.2 Landscape and Visual (Part 3 - Anne Priscott)

There is little in this text that either adds to the ES or relates to particular interests of the Cambrian Mountains Society, whose long-established sequence of comments on this proposal is dismissed as an echo of Ceredigion County Council (5.14). It is a matter of record that the CMS submissions to the original proposal at the s42 stage were reflected in a radical re-draft of the inadequate and misleading NTS, and that its comments on the unattractive and untypical gloomy photographs used at the stage have been largely vindicated by the somewhat improved and more helpful material now produced.

The text at 5.43 & 5.44 seems not to recognise that development of this proposal would add to 'proliferation' and awareness of *'wind farms sited in every direction'* would spectacularly occur in respect of Pumlumon.

It might also be added that following the request from CMS - and thanks to the welcome co-operation of the applicants - there are now adequate and information ZTV maps at Appendix 3.5

2 Responses to MyG's Comments on Relevant Representations [i.e. not on the Written Representations]

2.1 Policy considerations and site selection

As noted at 1.1 above, the First Minister's comments that TAN 8 is no longer relevant are repeated misleadingly out of context (p9).

2.2 The CMS is not mentioned in this re-hash of the ES and MyG's own WRs.

3 Comments on the response by MyG to ExA's first written questions

3.1 In response to Q 2.2 on the topic of the scale of the study area the applicant seems only to consider the need to demonstrate simultaneous visual effects rather than those on landscape character or perceived sequentially, which can extend materially over greater distances.

3.2 In response to Q 2.4 there can be a danger that the necessary concept of [adverse] significant effects can cause those which may individually not be significant to be discarded or disregarded. I realise that this is not Ms Priscott's intention, but it is worth emphasising that the individual significant effects are those at the visual core, but are inevitably re-inforced by others at greater distance as part of the overall impact of a proposal.

3.3 In respect of Q 2.6 the SNH 2014 Guidelines have considerable merit in many areas - such as addressing the need to make the topic more easily understandable - but have to my mind one serious drawback. They rely on super-complex and over-large visual images which are beyond the reproduction capacity of the 'normal people' to whom the Guidelines are now addressed. This comment also applies to Q 2.8.

3.4 At 2.15 this is a helpful answer from the applicant in respect of the developing local context of recently erected or proposed turbines in the visual neighbourhood. I note the comments of Powys County Council, too, and believe that it requires some re-assessment, especially in the light of the schemes between the site and Llangurig.

3.5 In relation to the answers given to Q 2.17 to questions about combinations of turbine component size I refer the ExA to CMS Written Representations at 2.1.1.
