

## Ymgyrch Diogelu Cymru Wledig (Sir Trefaldwyn)



### Campaign for the Protection of Rural Wales (Montgomeryshire)

Cadeirydd / Chairman Christopher Fuller

#### **Statement: Tourism and Socio-Economic factors. (CPRW Reg. 10030002)**

CPRW (Montgomeryshire) appreciate the opportunity to make a statement based on our original submission to the examining Authority. References to tourism studies made here are fully detailed in that submission.

#### **1. General points on the Importance of a full consideration of tourism impacts**

1.1 Initial representations were made regarding a number of issues. Landscape, Grid connection, policy and environmental issues appertaining to the River Wye SAC are fully dealt with elsewhere although we maintain our strong objections on these grounds. Tourism, a major provider of income and employment to Powys, has not received such consideration.

1.2 Economic factors must be given due weight in a determination process. It is of concern that Powys have not sought to provide evidence given that their legal department recently advised the Planning Committee to reconsider two single turbine approvals where tourism reports had not been presented as decisions were likely to be subject to Judicial Review.

1.3 Despite inherent difficulties assessing possible tourism impact there are planning precedents for a reasonable presumption of harm being considered material in rejecting applications. Two recent Welsh appeal decisions have given substantial weight to the potential detrimental impact of windfarms on walking and riding tourism in particular. We commend the reports of Inspector Jones at Mynydd Llanllwni in

SSA G<sup>1</sup> and Inspector Nixon at Pentre Tump in Radnorshire<sup>2</sup> to the Examining Authority.

1.4 Economic factors were excluded from consideration in the Welsh Government brief to Arup in drawing up SSAs and it was intended they should be factored into any further refinements and all planning decisions.

## **2. Specific Points regarding Tourism pertinent to this Examination**

2.1 MyG Ltd's consideration of tourism is principally confined to a literature review.

We agree with their conclusion that little reliable 'evidence' exists from historic studies of mainly questionable rigour. They aver that harm to tourism is unlikely but conclude this without any robust analysis of local tourism factors. Data is readily available from Visit Wales and the Powys Booster surveys and the attraction is incontrovertibly the unspoilt panoramic landscapes and tranquillity that an industrial scale windfarm would degrade. Mid Wales Tourism Partnership puts it unequivocally as: a 'stunning natural environment and expansive countryside; the most spectacular and unspoilt in Europe, a Mecca for outdoor pursuits'. Visitors are typically relatively high spending retired couples and young professionals who come throughout the year. Some 75% are repeat visitors and 10% invest in holiday homes in Montgomeryshire. Mid Wales regularly comes out as the top place to visit in Wales rated first for its natural environment.<sup>3</sup> Increasing tourism value and all year day and staying visits are the main tourism policy objectives for Powys.

2.2 MyG Ltd give undue weight to a 2003 developer commissioned study at Fullabrook which on peer review was found to exhibit serious methodological flaws. Fullabrook is not analogous to North Powys in its tourist attraction or demographic and does not face multiple windfarms and concomitant transmission infrastructure. As the researcher herself made clear, extrapolation from spatially, demographically and temporally different locations is unjustified and unacceptable.

2.3 Given the obtrusive and incongruously moving nature of turbines, the wider landscape, limited only by distinct topographical features, must be considered. Similarly, it is inappropriate to restrict analysis to tourism businesses proximate to a

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1 Appeal Report Inspector E Jones: Land at Mynydd Llanllwni, Mynydd Llanfihangel and Rhos-y-Corn Common Carmarthenshire January 2014

2 Appeal Report Inspector Nixon: Pentre Tump New Radnor Powys 2014

3 Welsh Visitor Survey March 2012

windfarm. Visitors see and enjoy the totality of the area although most accommodation is obviously sited in valleys and near facilities.

2.4 Tourism is crucial to Powys with 12% of VAT registered businesses being tourism related. It also supplements local incomes through part-time work and farm diversification and supports local trades, crafts and services, such as the village shop, that underpin community life. Every holiday park home brings some £8 – 9000 annually into the local community<sup>4</sup> so the impact of even a small drop in tourism can be critical. Windfarms in Scotland have been shown to depress accommodation prices and discouragement of private sector investment is another significant threat. In Mid Wales this is already being experienced where windfarms are proposed and in the expected transmission corridor.

2.5 Walking tourism has considerable economic benefits to the area. Research<sup>5</sup> has shown that with some 18.6 million leisure day walking trips to the Welsh countryside annually this is contributing £190 million visitor spend to the Welsh economy. Walking is an increasingly important and year round visitor activity and the Mynydd y Gwynt area has a large number of Public Rights of Way as well as regionally promoted longer distance walks.

### **3. Relevant Studies**

3.1 Inexplicably, the MyG Ltd literature review takes little account of two studies directly pertinent to Mid Wales.

3.2 A detailed survey of visitors to rural and coastal Wales commissioned by the Welsh Tourist Board<sup>6</sup> has some revealing data even given that public attitudes to windfarms were more positive and whole scale proliferation not anticipated in 2003. 22 % of all visitors surveyed stated they were less likely to return to an area with windfarms but when visitors primarily came for the scenery and outdoor pursuits the reaction was more adverse. This finding is backed up by the 2013 Mountaineering

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<sup>4</sup> Holiday and Home Parks Association and Visit Wales; Economic Impact Assessment of the Holiday Parks Industry in Wales 2011

<sup>5</sup> Bryan Jones Munday Roche Welsh Economic Research Institute Cardiff University: The Economic Impact of Hill Walking in Wales 2011

<sup>6</sup> NFO World Group: Impact of windfarms on Tourism in Wales. Presentation of Key findings for Welsh Tourist Board 2003

Council of Scotland survey of 1 000 long distance walkers of whom 2/3rds stated they would not return or were already avoiding areas with windfarms.

3.3 65% of tourists surveyed in the 2003 study thought that windfarms had a negative impact on Welsh scenery and in this and other studies the antipathy to windfarms doubles if more than one in a landscape. This serves to confirm the view of many researchers that there is a 'tipping point' in the number of windfarms beyond which tourism will be significantly adversely affected. Given that Mid Wales already has 260 turbines and further construction will require extensive transmission infrastructure, we have reached a point where few views in upland Montgomeryshire would be without the visual intrusion of wind turbines or transmission infrastructure.

3.4 The Welsh Government commissioned Regeneris and The Tourism Company to study the potential impact of windfarms on tourism in Wales <sup>7</sup> The 2014 report included a case study of North Powys, an area which Regeneris concluded was much more sensitive to windfarms given the overwhelmingly rural nature of tourism; the visitor demographic, and the disproportionate nature of windfarm and infrastructure development in a relatively small area. They considered that not only could tourists be deterred but lost visitors would be very difficult to replace without the qualities of unspoilt rurality and tranquillity. These sensitive conclusions lead to the report being embargoed until the end of the Mid Wales Conjoined Public Inquiry last March. A summary of the Regeneris report is appended for the Inspector's reference.

#### **4. The Economy**

4.1 Montgomeryshire has a stable, diverse and thriving economic base of mainly small enterprises, several of which are world leaders in their field, There are high numbers of self employed and highly skilled workers and at 1.3% and falling<sup>8</sup> unemployment it is one of the best performing economies in Wales. Short term windfarm construction contracts, even if locally feasible, will not benefit an economy of this nature being more likely to prove detrimentally distorting.

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<sup>7</sup> Study into the Potential Economic Impacts of Windfarms and Associated Grid Infrastructure on the Welsh Tourism Sector. A report for the Welsh Government prepared by Regeneris Consulting and The Tourism Company (March 2014)

<sup>8</sup> Office for National Statistics December 2014, the number of claimant's for Job Seekers Allowance in Montgomeryshire was 498 representing just 1.3% of the economically active population. This is 0.7% below the national average and 190 lower than in December 2013.

4.2 Claims made for employment from windfarms are exorbitant and, we further note, are not being borne out in practice.

4.3 MyG Ltd do not reference the Cardiff University study <sup>9</sup> that uses real data to examine the economic impact of existing windfarms on rural Wales. Researchers concluded that economic development outcomes were 'questionable'. There were limited opportunities for genuine local purchasing of goods and services and the development of any significant turbine manufacturing capacity in Wales was highly unlikely given the existing skills and manufacturing expertise in other non-UK countries. Operation and maintenance activity was likely to create less than 150 direct jobs across Wales but job losses in rural tourism were probable. They assessed that community benefit schemes were not acting as an economic driver given the inherent constraints.

4.3 Depression of house prices and sales activity is not a planning consideration but does impact on the economy, staff recruitment and on small businesses seeking to raise collateral on their homes to expand. This is already an issue in Montgomeryshire resulting from the windfarm proposals.

In conclusion CPRW state that the nature of our tourism economy provides strong indications of adverse and potentially irreversible impacts on a thriving economy. In conjunction with consideration of other adverse impacts the sustainable limit of wind energy development has been reached in Montgomeryshire and the unacceptable consequences far outweigh any limited potential benefit.

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<sup>9</sup> Munday, Bristow & Cowell Cardiff University ESRC Centre for Business Relationships & School of City and Regional Planning in Journal of Rural Studies (2011): Windfarms in Rural Areas: How far do community benefits from windfarms represent a local development opportunity ?

**A Note on the Study into the Potential Economic Impacts of Windfarms  
and associated Grid Infrastructure on the Welsh Tourism Sector  
A report for the Welsh Government prepared by Regeneris Consulting  
and The Tourism Company (2014)**

## **1. The Study**

1.1 This study was commissioned by the Welsh Government, dated February 2014 and released 4th April 2014. This note provides information from the Report as pertinent to North Powys. Direct paragraph references to the report are given in parenthesis.

1.2 The Regeneris study includes a brief overview of existing research. We concur that there is a dearth of robust, recent, peer reviewed post -construction data and the predictive studies exhibit variable methodology and analysis. The Regeneris report makes clear the dangers of using one area as proxy for another when assessing tourism impact, even within Wales.

1.3 Figs. 3.2 and 3.4 review windfarm development in Wales and clearly show the considerable imbalance of proposed development weighted towards North Powys. Regeneris then go on to demonstrate that the characteristics of tourism in North Powys are such that the area is far more sensitive to windfarms than most other parts of Wales.

1.4 The authors carry out some limited primary research in the sample areas of North Anglesey, Rhondda Cynon Taff, Neath Port Talbot and North Powys.

1.5 **Study Conclusions for Wales:** The Report concludes that the current, relatively modest scale of Welsh windfarm development offers limited guidance as to impact on tourism given the level of potential development despite some anecdotal evidence from North Anglesey that turbines are deterring visitors (7.49). Regeneris assume some 'tourist displacement' from areas with windfarms but that visitors may go elsewhere in Wales so, overall, Welsh tourism levels should hold. There is no justification or evidence cited for this assumption; it is equally feasible that visitors will go to areas of England where on-shore windfarm consents are less likely to be granted.

1.6 No robust evidence is brought forward to show windfarms attract visitors although considered there may be a limited potential for day visitors from proximate, large conurbations to the South Wales windfarms if visitor centres are built.

1.7 **Study Conclusions for North Powys (SSAC & B).** The situation is assessed as being rather different. To quote: ***'The scale of the development combined with the visitor profile and wilderness offer of this study area leave it more sensitive to windfarm development than other parts of Wales ... there may be less potential for replacement of visitors than other areas.'*** (7.68 and conclusions)

1.8 Regeneris go on to state: ***'The scale of development and dense clustering of windfarms were considered to increase the potential for adverse reactions.'*** (p.120)

1.9 The report does not seek to quantify impacts beyond the assessment of 'moderate' for North Powys visitor types (Section 7 conclusions). Regeneris consider there is a risk that visitor reactions will become more negative over the next 10 years where visitors may feel a 'tipping point' has been reached in areas such as North Powys with a high rate of development.

## **2. North Powys Case Study**

2.1 The Regeneris desk study is far from exhaustive but accurately identifies the 'tourist attraction' of the area and recognises that certain visitor markets are more sensitive to windfarm development. North Powys visitors are cited as enjoying the 'dominance of the natural environment' and the 'importance of tranquillity', 'remoteness and feeling of isolation' (6.145).

2.2 The unreliability of extrapolating tourism impacts is evidenced through a comparison of 'sensitivity' ratings for all the case study areas (tables pp120-130). North Powys is assessed as having higher sensitivity to windfarm development than other areas in Wales due to:

- landscapes
- type of visitor
- high percentage of repeat visitors
- limited product diversity
- proximity to windfarms

2.3 Regeneris conclude (e.g. 7.53) that tourism is an important source of local income and employment and: '**businesses (in North Powys) may be sensitive even to small changes in visitor numbers as a result of windfarm development and there may be a particular challenge for them replacing those visitors who are deterred.**' (8.6).

2.4 **Construction** (7.62 and conclusions): Noise and disruption are of particular concern to tourism businesses. Regeneris conclude that construction of one small windfarm may have a limited effect but construction of a number of large windfarms, as proposed for North Powys, could have a different result. The long construction period predicated for North Powys is of particular concern with the disruption and closure / diversion of popular trails, walks and bridleways.

2.5 Regeneris assess that any congestion will impair accessibility and is likely to deter visitors given the limited road capacity in the area. They do not take into account the concurrent installation of substantial transmission infrastructure or major alterations to rural roads currently unsuitable for AILs and HGVs.

2.6 The Report notes the consistently negative reaction of people to transmission infrastructure and that, '**This strong feeling towards Grid infrastructure presents an increased risk for those areas where new pylons are proposed alongside considerable windfarm development, particularly North Powys**' (p.3 xv) Regeneris indicate there is no evidence of existing South and North Wales pylon lines discouraging visitors but equally, there is no evidence they do not and no precedent for the concatenation of turbines, transmission lines (132 and 400kV) and transformer stations proposed for North Powys.

2.7 Regeneris note that public appreciation of the benefits of technologies such as mobile phones, wind energy, electricity transmission does not necessarily outweigh their antipathy to mobile phone masts, wind turbines or pylons in otherwise unspoilt and attractive landscapes (5.58).

2.8 Discouragement of private sector investment resulting from windfarm development is seen as a significant risk factor (p.137).

2.9 Regeneris found that business owners do not perceive community benefits or other 'mitigation' as offering any real opportunities or recompense for lost trade (7.73). This finding is supported by the evidence from Cardiff University as cited in the CPRW statement.

### **3. North Powys Visitor types**

3.1 Many visitors, particularly the higher spending older people and young professionals who constitute over half the North Powys visitor demographic, see the area as an 'alternative to busier parts of Wales' (6.76).

3.2 Walkers are an important sub-section of visitors and there are National Trails and Regionally Promoted Trails (6.146) in close proximity to proposed windfarms such that turbines will be perceived as the dominant feature over a considerable distance seriously detracting from the qualities of a panoramic and tranquil natural landscape which walkers expect. Regeneris assert, without evidence, that 'a large proportion of walkers may not change their visiting behaviour.' (8.5). This is not borne out by Ramblers Cymru or the Mountaineering Council of Scotland.

3.3 Regeneris identify that older people form a significant proportion of North Powys visitors and are more likely to be sensitive to windfarm development (8.4). This market sector is generally higher spending, repeat visiting and less seasonal providing a stable and lucrative client base.

3.4 North Powys visitors tend to stay within the locality (7.55).

3.5 Regeneris consider: '***it may be more difficult to attract other tourists to replace deterred visitors***' where the type of visitor is more susceptible to landscape change (section 7 conclusions).

3.6 Regeneris note that Montgomeryshire countryside is seen as '***unique***' within Wales (p.118) and draw analogies only with tourism in parts of rural Scotland and Northumbria (p.115) where there is also increasing concern regarding the impact of windfarms on walking tourism promotion.

3.7 North Powys tourism businesses perceive windfarms as the dominant threat. Some windfarms have had to be accepted although business owners state that many visitors would prefer not to have them. More, larger turbines and associated infrastructure are considered the step too far.

3.8 Regeneris cite the small post construction study at Bryn Titli / Llandinam (1996) as demonstrating that tourists are not deterred by windfarms. However, this was a survey of some 90 visitors only. As they were in the windfarm vicinity they could not represent those who had been deterred already. A significant percentage still commented that the windfarm had detracted from their experience.

#### **4. Limitations to the Regeneris Study**

4.1 Primary research is too limited to fully assess validity and there are significant errors and omissions. The study area was restricted and interviewees consisted of only nine businesses and PCC Tourism Officer/s (7.51-2). Visitor interviews were not conducted.

4.2 The number of businesses and staying visitors who will be affected is well underestimated (6.65-6 and 7.53). There are over 4,760 holiday Park homes, 320 touring pitches, 66 guest houses/hotels and 153 self-catering units within a 15km radius of the two North Powys SSAs. It is entirely reasonable to consider this wider area given the intrusive visibility of wind turbines and the importance of the entirety of the setting to the typical visitor. Planning requirements nor logistics would locate holiday homes on open upland plateaux but sites them unobtrusively in well wooded valleys nearer to facilities. Few tourist businesses in the uplands does not equate to a lack of day and staying visitors appreciating those tranquil, unspoilt areas.

4.3 Walkers and cyclists are correctly identified as an important visitor market but the considerable number of horse riders, both staying and day visitors, are completely omitted. This is a market sector uniquely impacted by wind turbines. Prince Llewellyn, Cross Wales and Great Dragon Rides all pass through proposed turbine fields. Many riders avoid turbines and businesses would no longer be able to promote these trails.

4.4 An unusually high 10% of visitors own holiday homes in the area but this is not factored into the assessment. Such regular visitors make a very significant contribution to the local economy.

4.5 No consideration is given to the culturally rich prehistoric landscape of the area the integrity and important inter-visibility of which would be severely damaged by the construction of windfarms. The relatively unchanged landscapes of the uplands make the area of special importance.

4.6 No account is taken of the requirement for a highly incongruous 21 acre upland transformer station and multiplicity of overhead transmission lines. These will be clearly visible from higher ground with visitors experiencing a highly industrialised landscape.