

Comments from The Cambrian Mountains Society on documents submitted for Deadline VI

Deadline VII 16th April 2015

Material Submitted by Mynydd y Gwynt Ltd

MyG 1 Email dated 16th March 2015

The applicants are wrong to assert [bullet point 2 below para 1] that '*There is no information available from any potential developer regarding even SSE's formerly proposed scheme*'. The proposal is still logged on the National Infrastructure website as at the pre-Application stage. SSE's Scoping Report to the former IPC is still published on the site. At Appendix C this contains as Figure 1 a Location Map showing the site boundary in relation to SSA 'D', and at Figure 2, a detailed map of the proposed layout showing turbine locations and other infrastructure components. Accordingly in the term adopted by NRW it should be considered as a 'registered NSIP' application for which in broad terms, design information at scoping is in the public domain.

Updated Figure 11.12a Designated Sites within 10km

Given the blue symbols used to show the turbines in the MyG proposal as a 'proposed wind farm' it is misleading not to distinguish others at the proposal stage from the turbines in the 'other wind farms' shown in black. The impression is thus given that none of these turbines is at the proposal stage and thus that all exist. Accordingly the proposed Bryn Blaen turbines should be shown in blue as they are not part of the existing baseline. Should this error be included in other maps then it should be similarly corrected.

MyG responses to ExA's Second Round of Questions

Part 1 Policy and General Matters re Question 1.9

CMS is surprised that the applicants appear to make capital out of its earlier strong opposition to the then proposed Nant y Moch scheme which dominated SSA Area 'D'. This in no way belittles its position in relation to this scheme, which has the added unacceptability of being outwith the SSA and incontrovertibly separated from it by the environmentally sensitive Pumlumon massif. Moreover, CMS is puzzled that its opposition is portrayed as being '*largely focussed*' on this policy misfit. CMS wonders if this point was made purely on the basis of its web-site rather than on consideration of its detailed contributions to this Examination process, where (following a thorough submission at the abandoned original design process) it has submitted a highly-detailed and specifically-critical response to the present assessment.

Part 2 Landscape and Visual Impact

PART A Updated CLVIA

Visualisations representing the 'Worst Case Scenario'

CMS maintains that - as it originally set out at the start of its landscape and visual evidence - the 105m-diameter turbine-blade option does represent the worst case. The subsequent submissions and visual evidence on the matter demonstrate that there is now general acceptance by the parties that this is so, or is at the least an option to be explored.

Having originally stated at ES 8.90 that the 90m diameter was the worst case, Miss Priscott now concedes for the applicants [paras 17 & 18] that *'both scenarios represent the worst [sic] of one or the other factors, blade length or hub height'*.

In its submission on the applicants' response to the Second Round of Questions [pp9-10] NRW stated that *'the 105m rotor diameter is the worst case'*. CMS agrees with Simon White's further comments that blade overlap and stacking would be more common and noticeable. It reminds the Examiner of its original text and its Deadline VI submission, based on the key fact that when compared to the 90m variant, the blade-sweep of the 105m diameter option is 36% greater in area, reaches down to 20m above ground level, but yet remains extant up to the same 125m tip-height.

The recently-submitted comparative visualisations demonstrate this, and the propensity for blade characteristics as noted by NRW. In addition, if the 105m turbine blades were to rotate at the same speed as the 90m variant, the tip speed would increase, from c170mph to almost 200mph.

These worst case characteristics for these 105m diameter blades would arrest the eye and be particularly noticeable for those viewpoint locations closer than 4km as follows:

- VP1 - 3.9km
- VP3 - 3.4km
- VP4 - 2.5km (and CMS VP 'C' - 2.7km)
- VP5 - 1.8km
- VP22 - 0.97km (and CMS equivalent 'B' - 1.1km)
- CMS VP 'D' - 2.8km
- SW 'A' - 0.64km
- SW 'B' - 0.8km

PART B

In the response to ExA's Q2.5, the applicants add an italicised text preceded by an asterisk which refers to the CMS film of the Cambrian Mountains and its reference to the general absence of walkers *'on these mountains'*. This self-evidently does not refer to Pumlumon and its surrounds relevant to this proposal, but to the empty heart of the area.

