



**Cyfoeth  
Naturiol**  
Cymru  
**Natural  
Resources**  
Wales

**Mynydd y Gwynt Windfarm**

**Planning Inspectorate EN: 10020**

**Natural Resources Wales' Response on  
Landscape and Visual Amenity**

**Deadline X, 14 May 2015**

## **Introduction**

- 1.1. The Applicant's comments at Deadline VII on Landscape and Visual Amenity relate to NRW and Simon White's evidence which responded to the ExA's second-round questions and those at the hearing. In order to keep this response as short as possible only the more salient points are addressed. In many cases these are removed from the ExA's original questions but need to be addressed due to the highly critical nature of some of the Applicant's comments, and to clarify NRW's position and assist the ExA. The lack of response to other, more minor points does not imply agreement with them or a change of view, which remains as stated in our written representations and previous responses.
- 1.2. This report is numbered as per the relevant ExA question, hearing questions and MyG's comments on strategic search area D and its position in this application. The comments should be read in conjunction with the Applicant's Deadline VII comments on landscape and visual matters dated 16 April 2015.

## **2. Comments**

- 2.1. The comments are set out in tabular form over page.

**Response to Table titled ‘Comments on Simon White’s ‘Final Report for Natural Resources Wales March 2015’**

| ExA 2 <sup>nd</sup> round question no | ExA question   | Simon White’s evidence NRW Deadline VI 26 March 2015 | MyG’s response Deadline VII 16/04/15 | NRW Comments on MyG response   |
|---------------------------------------|--|--|--------------------------------------|--|
| 1.5                                   | Has the applicant any documentary evidence to back up the assertion that the area in which the application site was left out of TAN 8 SSA D only because of the misinterpretation of low fly zones when the original SSAs were produced? | 2.1-2.6  |                                      | <p>In relation to Simon White’s role in the SSA process, he was sub-consultant to Arup in respect of landscape and visual issues in the 2004 Stage 1 study and subsequent SSA refinement studies. As a sub-consultant he cannot be characterised as the ‘<i>guiding hand</i>’ suggested by the applicant. Arup led and were responsible for the overall sieve mapping approach in the 2004 and SSA studies, and the defining of technical constraints including absolute constraints in the SSA studies. Mr White was not involved with these aspects. He advised and was involved in each SSA refinement study in terms of landscape sensitivity and impact, and in regard to the final rationalisation of each area to define a coherent refined boundary but Arup hold the final responsibility for the boundary, study text and conclusions. Nevertheless, this experience, overview and background could be considered to give Mr White’s evidence weight compared to that of others who are involved with individual development proposals only.</p> <p>In the capacity of advising on landscape impacts and the final rationalisation of the refined boundary his opinion remains as stated in 2.4 of his response to MyG <i>i.e.</i> had the site been assessed that it would have been highly unlikely to have been recommended as one part of a refined SSA in two parts either side of a mountain such as Pumlumon. By the same token, it would also have been untenable to have previously allocated a broader SSA in two parts either side of the mountain, or indeed including it, as it does not fulfil the TAN 8 criteria defined in 2.9 of the guidance. Finally, the site would have been unlikely to have been allocated on its own due to its limited capacity. Therefore, SSA D where it lies is still the most likely option to assist in reaching national targets.</p> |

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|---------------------------------------|---|--|--------------------------------------|---|
|                                       |   |  |                                      | For information, analysis of areas more than 5km from SSA boundaries has been carried out in other SSAs where there is sufficient justification e.g. SSA F. It should also be stated that these areas were found to be unsuitable for strategic scale wind farms.   |
| 1.10                                  | References have been made to the Sarn Sabrina annual walk which passes close to the application site. Is there any information as the number of participants taking part in this walk on an annual basis. |  |                                      | <p>We note that MyG addresses our point on significant effects close to the source of the Severn in their first paragraph. We also note that whilst it is for a limited stretch it is one of the most important points on the walk as it is on or close to the key destination on the walk i.e. the source.</p> <p>The other points raised are not relevant to this issue. The applicant raises the issue that NRW asserts that Ms Priscott has underscored effects. This misrepresents what we say in regard to this point.</p>  |
| 2.1                                   | PCC in its LIR indicated at paragraph 4.34 that the applicant's LVIA categorises significant effects  | 2.8 to 2.10  |                                      | <p>As stated in our comments the applicant (Ann Priscott) clearly states that <i>'for an impact to be significant it should be greater than the median'</i>. This is not the same as subsequently stated in the applicant's comments that it means <i>'an effect less than the median could not be substantial'</i> (assumed meaning is <i>'significant'</i> rather than the <i>'substantial'</i> stated).</p> <p>The Applicant mis-characterises NRW's response as inviting the ExA to move away from the windfarm context and broadly accepted scoring methodology. We appreciate that GLVIA3</p> |

| ExA 2 <sup>nd</sup> round question no | ExA question  | Simon White's evidence NRW Deadline VI 26 March 2015 | MyG's response Deadline VII 16/04/15 | NRW Comments on MyG response  |
|---------------------------------------|---|--|--------------------------------------|---|
|                                       | as only those over moderate to substantial and above etc  |  |                                      | does allow practitioners to define their own levels of significance and the Applicant does state the method used, and uses it consistently. This is not our point. Our point is that the level has to be reasonable. Even if a moderate significance of effect is not considered by the Applicant to be significant, as is the case with many wind farm developer's assessments, effects above this level are, in our experience, almost always significant. This usually applies to the next level of significance of effect up from moderate <i>i.e.</i> moderate to substantial. In this case, the applicant has introduced an intermediate category of moderate/moderate to substantial. This is actually unusual in our experience and is not defined in the method. This is not a syntactical point but fundamental to the purpose of an LVIA <i>i.e.</i> to identify significant effects. In our view the Applicant's method sets the threshold for significance to such a level that otherwise significant effects are stated as not significant. This is not reasonable in our view and which is why we state that the effects are downplayed. |
| 2.5                                   | PCC states Plynlimon is one of the most significant and publicly valued peaks in Wales. Can justification for this statement be provided? | 2.11 to 2.13   |                                      | Our view is that the Severn valley is an attractive and largely unspoilt valley and even the stretch within the Hafren Forest is largely attractive with framed views and conifers on the steep valley slopes. Indeed, some visitors treat the forest as a destination in itself, with the picnic area surrounded by trees, and walks within it, as well as an introduction to the walk to the source of the Severn. We stand by our opinion that the wind farm introduces a major built element at Rhyd y Benuwch, dominating the framed view and therefore would radically change the experience and sense of expectation in this sensitive location. The forest does not spoil this experience. In our view, the Applicant relies too heavily on the conifers being a detractor in order to justify the wind farm.   |
| 2.10                                  | The applicant has provided an updated   | 2.14 to 2.16   |                                      | We disagree with MyG's comments which relate only to the second part of paragraph 44 of their CLVIA Update and do not address the issue which we raised in 2.16 of our response. Overall, the CLVIA Update paragraphs 42-45 find that the Plynlimon Moorlands aspect area   |

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|                                       | cumulative landscape and visual impact assessment at deadline IV. Can parties please comment on its methodology and conclusions. |  |                                      | in which the proposal is sited will not undergo significant cumulative effects. In the latter part of paragraph 43, where they address the northern part of the aspect area, not Esgair Ychion, it states that the proposal would not bring about any new cumulative effects. We reiterate that their findings on this area are incorrect and illustrate their flawed method.  |
| 2.11                                  | 105 m rotor diameter visualisations  |  | Considered elsewhere                 |  |
| <b>Hearing Question Responses</b>     |  |  |                                      |  |
|                                       | Is Pumlumon a significant and publicly valued peak?  | 3.3, 3.4   |                                      | <p>In relation to views, MNTGMVS910 Plynlimon Moorlands lies partly to the east of Pumlumon. In our opinion 'the characteristic views to the upland peaks to the north and west' mentioned in the area summary description would include views towards Pumlumon from and across the site, not just views to Snowdonia. Therefore, the proposal would adversely affect and disrupt these views.</p> <p>We note and welcome that the applicant again acknowledges the significance of Plynlimon.</p> |
|                                       | Conflict with TAN 8 Annex D?   | 3.6 to 3.7   |                                      | To clarify our point in relation to Annex D 8.4, we believe it is clear the proposal which lies outside SSA D results in significant change to landscape <i>character</i> as stated in the final paragraph 10.15 of NRW's Deadline II written representations Appendix B1 (18 December 2014). This therefore exceeds the threshold.  |

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|---------------------------------------|--------------|--|--------------------------------------|---|
|                                       |              |  |                                      | <p>In relation to Llyn Clywedog we agree that the proposal is not visible from the water surface but many visitors remain around its edge on higher ground from where the proposal is visible and it is a significant detractor in our view.</p> <p>In relation to other developments to the east, we note comments by others that the distant wind farms such as Bryn Titli and others are over emphasised in the photomontages such as from Viewpoint 1 on Plynlimon. We agree and this reinforces our point that the proposal would be significantly closer and therefore would have a larger and significantly greater adverse effect.</p> <p>The applicant equating the effects of this proposal on Pumlumon, the sources of the Severn and Wye and associated regional trails with the effects of the Carno windfarms on the A470 well illustrates why this proposal is more damaging. Interestingly, as an early wind farm Carno 1 is very discreetly located in relation to the village of Carno and the A470, despite the number of turbines, partly due to their size as well as siting. Carno 2, as a later, additional development with larger turbines, is significantly more visible to the road.</p> |
|                                       | Other        | 3.30-conclusion                                      |                                      | <p>MyG suggests that there is a <i>'significant intensification of the NRW written representation'</i>. This is not the case. The conclusions in NRW's Deadline II written representations Appendix B1 paragraphs 10.1 to 10.15 still apply. In 10.2 relating to national policy/guidance EN-3 and TAN 8 we state that <i>'It is clear that the development would cause a significant adverse change and harm to an area outside an SSA.'</i> When applied to the test in EN-1 paragraph 5.9.15 this equates in our view to the proposal being very damaging to the landscape. It is important for us to express our view clearly in these terms to assist the ExA in coming to a conclusion.</p>   |

**Response to table titled 'Comments on NRW's 'Comments on Responses to the ExA's Second Round of Written Questions'.**

|      | <i>ExA's question</i>   | <i>NRW response to applicant's position</i> | <i>MYG's position</i> | <i>NRW Comments on MyG response</i>   |
|------|---|---|-----------------------|---|
| 1.5  |   |   |                       | Answered in 1.5 above   |
| 1.10 |   |   |                       | No comment  |
| 1.11 |   |   |                       | No comment  |
| 2.1  |   |   |                       | No comment  |
| 2.5  | <p>PCC states that Plynlimon is one of the most significant and publicly valued peaks in Wales.</p> <p>Can justification for this statement be provided</p> |   |                       | <p>NRW notes that the applicant pays, and has always paid, due regard to the importance of Pumlumon.</p> <p>Our comments in relation to MyG's response to NRW's concise comments on the hearing discussion are as follows:</p> <p>NRW have made various points on the importance of Pumlumon because at the hearing the applicant significantly downplayed its importance as locally valued like anywhere else and focused initially and mistakenly on user numbers on the Wye Valley Walk. Had their response been more balanced (and accurate) there may not have been a need to make the further comments.</p> <p>In relation to the concepts of public significance and value, the Applicant put weight on the number of people visiting Pumlumon compared to peaks in Snowdonia. Whilst this is one measure of significance there are others which are equally valid. In the case of Pumlumon, it has an important place in Welsh culture and identity. The Mabinogion is a very important part of that culture and, for the benefit of English readers, is to Wales what Beowulf is to England. Richard Kelly addresses the cultural significance in his submissions 'NRW's response on cultural heritage, deadline X, 14 May 2015'. The Upland Ceredigion registered historic landscape description mentions that Pumlumon Fawr dominates the area to the north.</p> |

|      | <i>ExA's question</i> | <i>NRW response to applicant's position</i> | <i>MYG's position</i> | <i>NRW Comments on MyG response</i>  |
|------|-----------------------|---|-----------------------|--|
|      |                       |   |                       | <p>The applicant misrepresents NRW as relying on the 'Wales Online' appreciation of Pumlumon. This is not the case as the national body with responsibility for Wales' landscape. If required we could put forward further evidence if requested by the ExA. However, we do not think that this is necessarily appropriate at this stage. Our view is the representations made at the hearing are a useful sample illustrating Pumlumon's significance in addition to comments above and Richard Kelly's submissions.</p> <p>The fact that the applicant characterises the significance of Pumlumon as an ephemeral concept which is elusive and impossible to weigh clearly indicates that they have not appreciated its important place in Wales' landscape and culture. In this way they appear to have undervalued it despite saying that they pay due regard to its importance.</p> <p>The applicant then goes on to introduce the issue of whether there is any real public concern. This goes beyond what the ExA was asking and he has evidence to assist his view on this matter.</p> |
| 2.6  |                       |   |                       | No comment   |
| 2.10 |                       |   |                       | <p>In justifying not carrying out a cumulative assessment with the proposed Nant y Moch windfarm/SSA D the Applicant details website searches for the windfarm project. This is not necessary as they already have <u>full information on the infrastructure layouts as set out in their original CLVIA</u> which represent the turbine layouts finalised by Scottish and Southern Electricity (SSE) in their draft ES completed after several years of survey and assessment.</p> <p>It has recently been announced that the lease for the development of the Nant y Moch windfarm in SSA D has been transferred from SSE to Vattenfall. This means that <u>the scheme is not dormant and will now be progressed</u>. A strategic scale wind farm in this location therefore needs to be taken into account.</p>  |

|      | <i>ExA's question</i> | <i>NRW response to applicant's position</i> | <i>MYG's position</i> | <i>NRW Comments on MyG response</i>   |
|------|-----------------------|---|-----------------------|---|
|      |                       |   |                       | <p>There are two options as already discussed in our Deadline VI submissions. These are the Nant y Moch layout illustrated and used in the original MyG CLVIA. The alternative is using the understanding of the scale of turbines in that CLVIA and applying this to the refined SSA. This is illustrated in <b>Appendix 4</b> appended to this report which is a map extracted from SSE's draft ES for the Nant y Moch windfarm application showing the refined boundary and SSE's proposed turbine lay-out. Whilst a new layout may come forward it will still be constrained initially by the SSA boundaries, the refined area, technical constraints and by land ownership, all previously assessed in detail over several years by SSE. The principle and possible maximum extent of the proposal is therefore established sufficient for judgements to be made in terms of cumulative impact on Pumlumon, even at a broad level.</p> <p>If MyG was permitted, the fact that a future developer would carry out a CLVIA would not, in our view, mean that an acceptable layout could be found which sufficiently balanced the impact on Pumlumon with other receptors including Snowdonia National Park. Our view is based on detailed consideration of both the SSA, the SSE turbine layout and MyG.</p> |
| 2.11 |                       |   |                       | <p>In relation to the effects of the 105m blade turbines NRW has now made its submission in its Deadline VII 16 April submission, Appendix 3 paragraph 2.23. This confirms that the broad level of effect in terms of magnitude of change and resulting significance remains the same for each viewpoint. This is consistent with NRW's written representation. However, the new evidence of the visualisations confirm the significantly larger blade sweep, the increase in unsightly stacking and the less elegant proportions of the 105 m rotor diameter turbines makes them the worst case scenario. In our view this worst case demonstrates that the project has not been designed sufficiently carefully in order to minimise harm to the landscape in accordance with EN-1 5.9.8 and increases the level of harm of the proposal.</p>   |

|  | <i>ExA's question</i> | <i>NRW response to applicant's position</i> | <i>MYG's position</i> | <i>NRW Comments on MyG response</i>  |
|--|-----------------------|---|-----------------------|--|
|  |                       |   |                       | <p>The Applicant states that it is a matter of opinion whether a low tower/long blade combination is worse than a high tower/short blade combination. They do not appear to have made a judgement themselves on this and certainly have not agreed with any consultees on this issue. In our view and PCC's, the 105 m rotor diameter is definitely the worst case. The worst case scenario visualisations were not subject to advertising or consultation prior to the hearing although they are now published on the website. It is a matter for the applicant to judge whether this is acceptable consultation on the worst case.</p> <p>We note that the applicant criticises the NRW diagrams for giving a '<i>greatly distorted</i>' impression of the turbines, preferring their visualisations. Whilst we accept that the rotor diameter circumference would not be visible it is normal practice to show this in technical drawings (as demonstrated by the use of the Carno III windfarm drawing). We reiterate that the Applicant has not presented any scale drawings of any turbines. This is a major omission which NRW has had to compensate for by providing drawings for the ExA. The use of the circumference is a 2D static representation of movement of the blades which is what will be seen in practice, and which will be more apparent in the 105 m turbine rotor. The Applicant's static visualisations do not represent this at all. The Applicant's complaints in this regard are therefore unreasonable, in our view.</p> |

## NRW's Response to Comments on Strategic Search Area D and its position in this application

| MyG's point numbers | NRW comments on MyG response  |
|---------------------|---|
|                     | <p>The Applicant makes a number of comments on SSA D's position in this application. At the outset, it should be noted that representations on the SSA refined boundary were not made by the Applicant during the Ceredigion local development plan process. It is now too late to do this.</p> <p>There is an implication in various comments made by the Applicant that Simon White is compromised in his advice in relation to TAN 8, the refinement of the SSAs and subsequent advice to CCW and NRW. It should be noted that he has also advised local planning authorities on numerous schemes coming forward in various SSAs, many of which are now implemented. For the avoidance of doubt, it should be stated that he has acted in a professional manner in accordance with the Landscape Institute's code of standards of conduct and practice and does not consider that there is any conflict of interest in respect of this or other schemes. No one has raised this as a specific issue previously and his experience, rather than compromising his position, reinforces his understanding of the relevant issues in a Wales-wide context.</p> |
| 2                   | <p>As stated above, in relation to Simon White's role in the SSA process, he was sub-consultant to Arup in respect of landscape and visual issues in the 2004 Stage 1 study and subsequent SSA refinement studies. He advised and was involved in each SSA refinement study in terms of landscape sensitivity and impact, and in regard to the final rationalisation of each area to define a coherent refined boundary but Arup hold the final responsibility for the boundary, study text and conclusions which are balance of factors including the target output of the SSA. As the SSA D Annex D study mentions in 2.3 page 10, the study 'is not a comprehensive visual and landscape assessments of all parts of the SSAs similar to that which would be prepared as part of the environmental impact assessment for an individual development ....' It is therefore completely valid for Mr White as an adviser to NRW to comment on detailed proposals with associated LVIAs coming forward within the area.</p>   |
| 3                   | <p>NRW does not recognise the comments attributed to it. It is not the case that NRW has said that SSAs may be altogether constrained from development and if the requisite capacity could not be found in a SSA then it would need to be found elsewhere. The Applicant needs to provide a reference for these comments and we note that no written submission from Mid Wales Public Inquiry has been provided to substantiate these claims.</p>   |
| 6                   | <p>The Applicant misrepresents CCW, through Mr White, as having made 'objections' to the Nant y Moch scheme. CCW rather raised a number of concerns that needed to be addressed as part of the S42 consultation undertaken by SSE. The effect on the Snowdonia National Park was, and is, an issue which tends to push any potential SSA D layout closer to Pumlumon. It is this which is one of our major concerns about allowing MyG on the other side of this very sensitive receptor.</p>   |

| MyG's point numbers | NRW comments on MyG response  |
|---------------------|---|
|                     | As indicated above in response to 2.10, any layout that may come forward will still be constrained initially by the SSA boundaries, the refined area, technical constraints and by land ownership, as well as landscape and visual considerations. Whilst TAN8 states that not everywhere in an SSA will be environmentally appropriate this is highly unlikely to mean that no turbines will be placed into SSA D in due course. A strategic scale windfarm within these parameters close to Pumlumon is therefore highly likely to come forward. The SSE scheme is an illustration of a strategic scale windfarm exceeding the refined SSA area parameter, but otherwise is a useful indication of the size of turbines and broad scale of development. An assessment based on these principles therefore can be made.  |
| 7                   | The need to take the scheme in SSA D into account derives from its status as an SSA with the refined area as part of the local plan.  |
| 9                   | NRW wishes to confirm that it has passed all correspondence to MYG with regard to its consultation responses on the proposed Nant y Moch scheme. NRW is not aware that SSE developed any further iterations of the scheme following the S42 consultation. The implication that the outcome of NRW's concerns was SSE's withdrawal of the scheme is <u>speculation</u> by MYG and no evidence is provided. SSE would have had a number of issues to consider in the balance leading to their decision to withdraw from the scheme and the reason for this decision is unknown.   |
| 10                  | Mr White is just quoting from the Mynydd y Gwynt's submission to the Welsh Affairs select committee and clearly sets out the parameters of his criticism in 2.1 onwards of NRW's response to ExA's second round questions 1.5. The applicant appears to construe that we go beyond this but we have nothing further to add to our comments.   |
| 12                  | NRW's concern in respect of SSA D hinges on its location on one side of Pumlumon with national policy acceptance of landscape change and the MyG proposal on the other side, outside the SSA, where no significant landscape change is accepted. It is clear which is favoured in policy terms. The grant of the DCO at MyG would mean that the potential cumulative effects on Pumlumon could result in a high level of harm and would be very damaging. It is possible that these effects are such that this would inhibit the development of the refined SSA. SSA D is therefore important. The ExA can take into account EN-3 2.2.2 in that the refinement has been undertaken in accordance with relevant guidance. In order to properly take a strategic scale windfarm within it into account we have suggested various alternatives (e.g. 2.10 above). The important issue is one of principle <i>i.e.</i> that whatever its final layout, a strategic scale wind farm is likely in SSA D which minimises impact on Snowdonia National Park and therefore may impinge more significantly on Pumlumon. A future wind farm in SSA D, in our view, therefore has to be taken into account by the ExA, using the information available. |