

**From:** Jillina Gardiner [REDACTED]  
**Sent:** 01 February 2016 14:14  
**To:** Brechfa Connection  
**Subject:** RE: Brechfa Forest Connection

Jillina Gardiner, Gilfach Wen, Brechfa, Carmarthenshire.

I am writing to respond to the three questions raised by the inspector. EN020016 Second issue questions.

1. The value of tourism in the area.

At the most basic level, the discrepancies between the local impact report and other county council documents include a mismatch between only published scenic motoring trail for the area, which takes visitors down the B4310, to enjoy the views across this section of the forest, and the omission of considering the views from tourism accommodation on the hillside south of Brechfa West looking across the forest.

The discrepancies between the value of Brechfa Forest as a tourist attraction in Carmarthenshire County Councils response to this planning application and that for the wind farm on the same site is best illustrated by referring to the Local Impact Report, Carmarthenshire County Council (Appendix 1) produced for Brechfa Forest West wind farm for which this is the grid connection, and because of the location of the substation, this planning application covers power lines running across the same parcel of land.

In paragraph 2.6 the county council reports that the site designated as open access land and is popular with walkers, cyclists and horse riders and has been used to hold motorised events.

In paragraph 2.13 the county council refer to the number of bed spaces 600 to 700 provided by tourism business in the area and the number of camping and caravanning sites, as provided in the planning application for another wind farm on adjacent land. (Refusal of the planning application for a wind farm on Llanllwni Mountain was upheld by the planning inspectorate on appeal.)

The figures on the number of bed spaces were supplied to the wind farm developers by the county council. Visit Wales supplies to each county council details of all graded tourism businesses, including their address, the nature of the business, i.e. B&B, holiday cottage, bunkhouse, hotel, and the number of bed spaces. Each county council has a responsibility to also add to their database any tourism business that they are aware of which is not graded. There has been a move away from grading in the tourism industry as online reviews grow in popularity and the standards required by Visit Wales for each star level becomes less relevant to visitors expectations, so there are large popular tourism businesses that engage with the tourism department of the county council but which are not graded. However, other smaller businesses are likely to be missed off the county councils database and therefore any calculation of the value of tourism will always undervalue the size of the industry.

Visit Wales also surveys all graded tourism businesses each month asking for information on occupancy levels and prices charged. The averages over the year for each type of accommodation, and the average prices are then used in a standard formula known as a STEAM report to calculate the value of tourism in each county, and the value of a tourism attraction. The value of tourism to the local economy is not limited by the amount spent for each night's accommodation, but also covers the amount spent by tourists in other businesses, and the value to the local economy of the jobs created by the industry. There has been extensive research carried out into economic impact and many research papers published by academics. The Welsh government funds research each year into spending patterns and trends, and this information is integrated into the annual STEAM reports.

I have a copy of the report produced by the county council on the number of bed spaces within walking distance of this site. Because it contains contact information on each business it would be inappropriate for me to supply it for publication by yourselves. However I have put together a summary of the contents in appendix II, and used the standard Steam formula on those figures.

The history, and robustness of the Steam process can be found in the Steam report for Carmarthenshire, an example of which is.

[www.discovercarmarthenshire.com/business/.../STEAM\\_Report\\_2012.pdf](http://www.discovercarmarthenshire.com/business/.../STEAM_Report_2012.pdf)

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2. The mismatch between the decision of all county councillors that the power line should go underground and the support for the planning officers report by the planning sub committee.

As the Local Impact Report confirms in paragraphs 2.14 and 2.15 The rural development plan for the area, has four themes, agriculture and forestry • environment and countryside • quality of life in rural areas • locally based approaches to rural development. In addition this area is one of the 6 zones of the Cambrian mountains selected as a test bed for Welsh government policies on community led sustainable development. The community has been supported by its partners, the county council, Natural Resources Wales and Welsh Government to develop their own plans for their area and to take them forward for a number of years.

I believe that the uniqueness of a forest based community, where historically the community have been encouraged to develop a tourism industry based on recreational use of the forest, combined with being a pilot community for the development of Welsh government policies on community led sustainable development are the cause of some of the issues highlighted at the last hearing.

Traditionally, county councils have been the leaders in the development of plans for an area, consulting with the communities concerned once those plans have been formed. The process of the CMI is to support the community in developing and acting on our own plans as a fore runner for Welsh Government policy on community led development. In this case the community have drawn up plans for the publicly owned open access land and a marketing strategy for tourism for the area, and have been encouraged to put those plans

into action within their own businesses and community groups. One of the problems that appears to be arising is that the communication systems and working practices with the county council and other partner organisations are not designed for community led development.

With HRH the Prince of Wales being actively involved in his role as President of the CMI, there have been meetings which heads of departments and the chief executives of the county councils and other partner organisation have been eager to attend and express their support for plans launched. However, in practice information on the plans launched at those meetings does not appear to have trickled down into the relevant departments of the partner organisations. Equally the community have received support and grant funding for projects backed by heads of departments, but members of staff within those departments are not aware of the existence or implications of the grant projects. At the same time community councillors representing the communities involved with developing their plans are aware of the work that has gone on within the communities, but other county councillors are not.

These communication problems explain why the community led tourism cluster group for the area has received support in understanding the methods of calculating the value of tourism, and particularly the benefits of maximising the value of each pound spent by a tourist to a community, and are aware of plans to achieve that based on recreational use of Brechfa Forest and the surrounding rights of way network, that the planning officer responding to this planning application is not familiar with. This is the first point in the planning process for this planning application where the community have been able to respond to the report produced by the planning officer.

The limitations of the traditional communication lines within the county council would also explain why the planning officer has failed to consider in his report the impact on the development on all historical sites recorded in the historical environment database. There has been community led grant funded work in the communities surrounding Brechfa Forest which make the impact of this development on every historical site recorded in the historical environment database significant, but the assessment of the environmental impact on the heritage considers only those sites selected by the planning officer as being the most important. This area is the pilot project for Welsh Government policies on community engagement with all historical features in the landscape which are recorded in the historical environment database, known as the Historical Environment Act. We are ahead of the legislation currently progressing through the Welsh Government to support communities in engaging with their heritage which will obviously have to result in a change in working practices within planning departments.

The difference between the democratic decision of all of the county councillors that these power lines should go underground, and the decision of the county councillors on the planning committee to accept the planning officers report has been raised at the hearings for this planning application. In my opinion, one of the causes could be that the community taking the lead in developing the plans for an area, has kept the county councillors in that area informed of their plans. However, none of the local county councillors are members of the planning sub committee.

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Finally, research into the economic impact on tourism of power lines.

There is growing awareness of the economic impact on property values of power lines, with even the national press highlighting the importance of obtaining assistance from professionally qualified surveyors in assessing difference in property values.

<http://www.theguardian.com/money/2015/oct/31/power-electricity-poles-wires-compensation-claim>

When someone is buying a property, work and family commitments create reasons for limiting the area that the property is in. The relative values of property within that area are then based on features of the property including the views and concerns on the health impacts of power lines. While an element of tourism economy is linked to the property values when considering the balance sheet and profitability of a business, this does not provide a complete picture of the economic impact of power lines on tourism.

The Scottish government published research where the public were shown photographs of the views from a hotel window, some edited to include pylons, wind farms and other changes to the environment and an assessment on the economic impact of each feature was made based on the differences people thought that hotel room would be worth. Perhaps this method of assessment would have value for business travellers or those who have some other reason for visiting a specific area. However, it is not valid as a method in assessing economic impact in general in rural areas.

Tourism businesses particularly in rural areas, are not competing just against other tourism businesses in that area, their main competition is similar businesses in other areas. Tourists choose first what they want to do - how attractive the area is for them to spend their leisure time, and then choose the accommodation to stay in. If someone is planning their dream weekend away in the country, a percentage difference in prices between a property with views of a power line, and one in a different area without that reputation is not going to balance out the two properties in their decision making process. They want attractive landscape, and if the reputation of one property is that the area is blighted by power lines, then they will choose an area which does not have that reputation and select from the accommodation in that area. The Welsh Tourist Board research into the views of tourists on how attractive walks would be based on the proximity of wind turbines is more helpful because it focuses on how willing tourists would be to visit that area, however it does not consider photographs of power lines.

The internet has generated dramatic changes in all businesses, five years ago, if you were interested in buying anything from a kettle to a car you would compare the information published by the manufacturers, and articles in the press from reviewers, before making a decision. Now you turn to reviews from people who have purchased the item so see their opinion on the item and the service provided by the retailer.

The tourism economy in particular has been dramatically effected by the advances/changes that the internet has brought. In tourism, visitors used to depend on the grading system for assessing the services provided by accommodation, and articles and publicity by the tourism departments promoting areas, now every website listing holiday accommodation includes reviews from visitors who have used that accommodation. Instead of relying on

articles published by tourism departments on how attractive an area is, holiday makers turn to Google and the views of the local residents of what is important to them.

The costs of running a tourism business now include each business's involvement in managing the online reputation of their business, and personalised development of what there is to do in the area near their property. It was the decision of the planning inspector who considered the economic impact of the Brechfa Forest West that tourists unhappy with the intrusion of man made structures on walks in the forest would instead stay in holiday accommodation and take walks using the rights of way network. Therefore the visual impact of this power line on rights of way users is more important to the local economy than it would be normally. Tourism businesses effected by the wind farm have put time and effort into developing alternative marketing themes based on the information on the alignment for the power lines included in the wind farm planning application and the views of their community of how important the landscape is to the enjoyment of rights of way. Rushing through this planning application for an alternative route puts an additional burden on all of those businesses to revise all of this work, and produce alternative promoted walks from their property.

Community involvement in the reputation of an area and the economic consequences.

It used to be that financially only official organisations could afford to generate coverage in the press about the attractions, and therefore the official assessment of the impact carried considerable weight on the consequences of any development. Now the blogs and websites generated by individuals and even articles in the local press carry as much weight in a tourists decision making process as the official promotions, making the views of the people effected as important as any official assessment of the impact.

Welsh Government has developed a range of policies and support for communities and tourism businesses to use the internet to promote what is important about their area, their culture, their heritage, their "sense of place" and the reputation of the area. See appendix III for more info.

The importance of social media is a double edged sword. It is no longer possible for officials to decide that a issue is acceptable, and therefore due to the lack of press coverage tourists are unaware of the issue before they visit, while following their visit their complaints about the issue are limited to their personal contacts. If the community or tourists do not agree on the acceptability, their views will dominate social media, therefore will be centre stage when potential tourists use Google to make a decision on where to go on holiday. No matter what the official line is, or the research into the average response, the economic impact in a rural area of any development will depend on the views of the people effected by that specific development. The days when research into the average views of tourists can inform planning decisions based on universal assessments of the economic impact of any feature have passed. Just as the significance of cultural heritage from the point of view of the community is important in the planning decision specific to the application and community, so the economic impact of the development is dependant on community specific response to an application.

Therefore the method of engagement, and the success of the negotiations between WPD and the landowners is at the heart of the impact this power line development will have on

tourism. If WPD offer landowners a package which the property owners are happy with and local residents consider their opinion has been accepted during the planning process when considering the visual and environmental impact, then there is unlikely to be any backlash about the impact of the development in the local press or on social media.

However, the use of the planning system to push through a development using compulsory purchase powers to minimise development costs, angering the landowners and communities would have a very different economic impact. If successful it is likely to produce unflattering photographs of the power line highlighting its visual effect. Even letters to the local press about the injustice would come up when potential tourists research the area. Particularly, in the current economic climate, when the dispute is about of the costs of mitigation acceptable to a multinational company with a reputation for organising its financial affairs to minimise payment of corporation tax on its profits in the UK, landowners and communities effected would have multiple avenues on social media to express their anger, resulting in the development having a severe impact on the local economy.

Because the development title refers to Brechfa Forest, all tourism businesses around the forest will be impacted as well as any near the site. Tourism businesses may be able to mitigate the impact by their own use of social media, but all this will incur additional costs for every business.

Social media is such a powerful tool that large companies have to invest time and resources into having departments of people working on managing their reputation. Small businesses and communities simply can not afford that level of resource, so it is vital that the opinions of the landowners and community has as much weight as that of the companies which stand to gain financially from this planning application.

Jillie Gardiner

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