



The Campaign for the Protection of Rural Wales Montgomeryshire Branch Ymgyrch Diogelu Cymru Wledig Cangen Sir Trefaldwyn

Dear Minister

CPRW Montgomeryshire writes on behalf of its members who have expressed considerable concern at the overturning of legitimate planning decisions and the implications of revoking the Hendy Windfarm appeal.

We fully appreciate that the Ministerial decision is final and the only recourse of the Authority or community is judicial. However, as in the case of the Denbighshire windfarm, we consider a considerable injustice has taken place that undermines all confidence in the planning process.

No doubt, windfarm developers were hugely cheered by your comments in the Senedd and the certainty offered of open season for development in the Welsh uplands irrespective of any planning consideration or the democratic process. The vast majority of people in Powys found the, now customary, dismissal of landscape, heritage, economic or environmental impacts rather less reassuring. The spectre of our beautiful uplands covered with turbines and every panoramic view despoiled by their disturbing, obtrusive presence along with that of sprawling transmission infrastructure was distinctly chilling.

Independently scrutinised surveys carried out by many Town and Community Councils and the Conjoined Public Inquiry into Montgomeryshire windfarms clearly demonstrated that the overwhelming majority in the County consider further industrialisation of remote upland locations to be entirely inappropriate and unjustifiable. CPRW are not opposed to renewable energy and support community energy schemes, but the wholesale exploitation of the uplands for meagre, intermittent energy production is of a different magnitude. The carbon footprint of turbines, adverse impacts on biodiversity, the well being of resident communities and the rural tourism economy and the infrastructure it supports must all be fully weighed in the balance.

We put forward the following brief points on Hendy itself and the situation in general.

With regards to Hendy:

- although not all designated, our Powys landscapes are uniquely beautiful and large areas were denoted as worthy of special protection in the seminal Hobhouse report and indeed agreed as suitable for designation by the then Secretary of State. However, it is not designation which makes a landscape special. Wales is a signatory to the European Landscape Convention which asserts the primary importance of landscape to communities and the need for these landscapes to be respected and protected by and for the people. Industrialising wonderful upland areas with toweringly out of scale and incongruously moving structures and associated Grid connections is anathema to our sense of place, particularly when these are autocratically imposed.
- the understanding and interconnectivity of the rich upland heritage will be severely compromised by the presence of 7 overpowering and moving turbines and the scarring of access tracks in largely unaltered landscapes. With respect to Hendy we draw your attention to 'The Splendour Falls' by Wynford Vaughan-Thomas where he states (p.27): '*At the summit of the pass is the motte and bailey of Craig Eryr. It would be **difficult to find** a more evocative site.*' Wynford Vaughan Thomas was a man who knew his Wales and his

conclusions cannot be lightly dismissed. The Inspector's report says (para 365). ' *Such an impact would be significantly harmful to the monument's significance.*' The Inspector, like Vaughan Thomas, visited the site so was in a position to make an informed judgement.

- due process had been carried out. Powys Planning Committee rejected the application and Njordwind took up their right of appeal. An independent Inspector visited the site, scrutinised the evidence and heard the views of local people and expert witnesses. After due and reasoned consideration he agreed with the conclusions of the LPA and recommended rejection of the application. The democratic planning process was fulfilled and, importantly, seen to be done.

Implication for the planning process and the future of the unique uplands of Wales and our rural communities

- It is of grave concern that windfarms can be imposed on communities and installed in locations that due planning process recognises as highly inappropriate. This belies all the principles of good planning practice and local inputs as set out below.
- Introducing many cubic metres of concrete in perpetuity into upland areas is, at the least, highly irresponsible and short sighted considering the flood control resource provided by the uplands and the destruction and die-back of peat, carbon rich soils and fragile ecosystems. Disturbing upland hydrology in this manner defies all good practice.
- The Ministerial letter states that there is no limit to windfarms and that the Powys LDP sets no maxima. This is entirely erroneous. Based on detailed evidence, the LDP provides for up to 60MW of on-shore wind installation in the County over the next 10 years. It needs to be considered whether Hendy is the best site to make a significant contribution to achieving this maximum. Powys CC obviously considered it was not. If the WG has set unrealistic renewable energy targets then these require urgent review. The impact of turbines now some three times bigger than originally contemplated by Arup in their windfarm study also needs urgent re-assessment along with the fact that Powys has very little remaining Grid capacity rendering the County unsuitable for further economic energy production.
- It is further worthy of note that Powys is already producing nearly the equivalent of all the electricity used in the County through renewable generation. This would be a worthy target for every area of Wales and a significant and laudable achievement driving not only production but also energy conservation. We strongly disagree that Powys has not more than made its contribution through wind technology and this should now be a significant factor in the planning balance.
- In England there is essentially a community right of veto over windfarms with majority approval required. As Alun Cairn's states: ' *It is the UK Government's view that any renewable electricity projects need to demonstrate that they have local support and are appropriate for their location.*' It is inexplicable that Welsh people are afforded a lesser level of democracy and empowerment than their English neighbours..
- What is the purpose of a planning system and the Inspectorate? If they are to be emasculated and overridden and the democratic process treated with contempt, why are they maintained at public expense?
- The future for wind is recognised as off-shore, where the UK is a sector leader. There are also so many opportunities for carbon reduction which the WG is failing to take, for example: reducing road and air travel; sustainable building (every new factory, agricultural unit and home with solar panels and built to the highest energy saving specifications); support for more sustainable community energy used at point of production. In the absence of a proper varied and strategic approach communities cannot accept that the meagre output of

obtrusive turbines with their subsidies driving high levels of fuel poverty in rural areas is justified when destroying precious landscapes and ecosystems.

In conclusion : a policy that despoils our superb uplands and requires swathes of infrastructure in our beautiful valleys can never be 'green'.

Suitable locations for turbines may exist on 'brownfield' sites close to the Grid and well away from residential property and rural tourism or, for example, along the motorways beloved of the WG. Experience and research show that windfarms are not an economic driver in rural locations and have an adverse impact on our tourism amenity. Enough is enough as other countries, notably Denmark and Germany, have found. Wales as a whole and Powys in particular has played its part in 'wind harvesting' ; one solution alone will never suffice and over-reliance is a dangerous and hypothetical strategy. Democracy, transparency and local ownership are essential in planning if we are to build an inclusive and empowered Wales.

It appears to the public that windfarm decisions are pre-determined in Wales with no material planning consideration ever trumping the 'need for wind energy'. We are in danger of losing all sense of equity and balance in unquestioning pursuit of the renewables industry's profit driven mantra. CPRW would urge that it is time to pause and take stock and renew a vision for Wales that encompasses and values its unique beauty and outstanding cultural heritage. We must acknowledge their importance to public well being and the rural economy now and for future generations who will not forgive its squandering. Whilst further windfarms in Wales will have an infinitesimal impact on UK emissions or global warming, they will have a devastating impact on landscapes and environment.

We note in the debate transcript you state the WG provides: 'consistent support to communities as a vital part of energy development' . We are totally at a loss to understand what this constitutes or to what it refers and would be pleased to be enlightened as to how this relates to the democratic planning process. CPRW Montgomeryshire would welcome the opportunity to discuss or expand on any of these points with yourself.

Land can be bought and sold but the landscape and cultural heritage belongs to the Welsh people and those that come to value it. This is indeed a bleak day for rural Wales and for Welsh democracy.