

Marc van Grieken
Land Use Consultants
37 Otago Street
Glasgow
G12 8JJ

Jeffrey Stevenson
40 Walker Drive
Faringdon
Oxon
SN7 7FZ

James Welsh
Optimised Environments Limited
6th Floor
24 Torpichen Street
Edinburgh
EH3 8JB

Ian Gates
AMEC
Canon Court
Abbey Lawn
Abbey Foregate
Shrewsbury
SY2 5DE

29 April 2013

Dear Sirs,

The Mid Wales (Powys) Conjoined Public Inquiry into five wind farm applications and the 132kV overhead electric transmission line connection

Cumulative Landscape and Visual Matters agreed between the Applicants Landscape Architects for Carnedd Wen, Llanbrynmair, Llandinam Repowering and Llanbadarn Fynydd.

Thank you for your letter of 4 March 2013 consulting us on the cumulative landscape and visual amenity assessment for the windfarms known as Carnedd Wen, Llanbrynmair, Llandinam Repowering and Llanbadarn Fynydd. This letter is the joint response of Powys County Council (PCC) and Natural Resources Wales (NRW) following some preliminary comments sent to you by NRW on 28 March 2013. We have provided this joint response as we consider this will facilitate the agreement of the methodology for the cumulative assessment with both parties.

Ffôn/Tel 01686 613400 Ffacs/Fax 01686 629556

Ebost/Email carol.fielding@cyfoethnaturiolcymru.gov.uk carol.fielding@naturalresourceswales.gov.uk

www.cyfoethnaturiolcymru.gov.uk www.naturalresourceswales.gov.uk

Ladywell House, Park Street, Newtown, Powys, SY16 1RD / Tŷ Ladywell, Stryd y Parc, Y Drenewydd, Powys, SY16 1RD
Croesewir gohebiaeth yn y Gymraeg a'r Saesneg / Correspondence welcomed in Welsh and English

Your letter does not provide any detail on the likely timetable for the progression and completion of the cumulative assessment and we suggest that it would be helpful to discuss this further. The Inspector has timetabled the cumulative session of the public inquiry from 18 March to 25 April 2014 and the deadline for the submission of the Supplementary Environmental Information (SEI) and other information for this session is 24 December 2013. It would be helpful to have received the cumulative information prior to this so fieldwork can be completed before the advent of winter weather. Your thoughts on when the cumulative information will be provided to other parties would be helpful, as would a continuing dialogue on the development of the cumulative assessment and visualisations.

Our further comments are as follows:

1. We welcome the collaborative approach being taken by four of the applicants, namely the windfarms known as Carnedd Wen, Llanbrynmair, Llandinam and Llanbadarn Fynydd, and agree that this approach will be of benefit to the progression of the inquiry. It is of some concern, however, that the applicants for the Llaithddu windfarm and the Llandinam 132kV grid line are not included in this collaborative approach, particularly given that the Llandinam 132kV line is the grid connection for the Llandinam windfarm and that Scottish Power is the developer of both projects. A single set of visualisations would obviously be helpful to the inquiry but these applicants will need to be involved if this is to be achieved.
2. We suggest that it would be helpful to discuss and agree further detail on the scope of the cumulative assessment. To this end we would suggest that a more detailed scope is circulated for agreement with NRW and PCC along with a staged timetable for completion of the work. We suggest that the agreed scope and methodology is kept up to date and as a live document as we progress.
3. Paragraph 1 of your letter states that a Cumulative Windfarm Context Plan will be provided for the inquiry. We suggest that a preliminary plan is circulated to all parties now for comment as an initial stage in agreeing the projects to be included in the cumulative assessment. The plan should illustrate the size of the study area in addition to the windfarms to be considered in the cumulative assessment. We suggest that this shows separation distance lines as concentric rings at 5-km intervals radiating out from the edge of each wind farm. We would also suggest the use of a 1:50,000 OS map base (copied at either 1:50,000 or 1:100,000) for ease of legibility. The plan should also show the associated 132kV and 400kV grid lines in the National Grid, Scottish Power Energy Networks (SPEN) and Scottish and Southern Electricity (SSE) Mid Wales Connection Projects and the associated transport amendments. We also suggest that the plan illustrates the positions of the turbines in the various schemes, in addition to the planning boundaries, and other windfarm infrastructure including the substations, access roads and construction compounds. We request the provision of a hard copy of the context plan at an A0 or A1 size.
4. We consider that additional windfarms to those listed in your letter need to be included in the cumulative assessment but we await the further information requested in this response before agreeing this list. As suggested in preliminary comments (email dated 28 March 2013) we consider the cumulative assessment should include the proposed Dyfnant Forest and also the Nant y Moch and Mynydd y Gwynt windfarms. All of these projects are well developed and may be submitted to the Major Infrastructure Unit of PINs within the timescale of the public inquiry. Provision of a preliminary Cumulative Windfarm Context Plan, as suggested above, will help us clarify the size of your intended study area and which projects have been omitted within this area because you consider they will not give rise to significant cumulative effects.
5. As previously suggested in an email dated 28 March 2013 we suggest that the details of the windfarms to be included in the cumulative assessment are agreed between the applicants and PCC/NRW. This should include the project planning status, number of turbines, turbine

height to hub and blade tip, blade length, turbine type (if known) and the date of the infrastructure lay-out to be used. Details of the grid connections would also have to be agreed, for instance their routes and whether they are wood pole or pylon lines. We are aware that National Grid, SSE and SPEN are currently completing routing studies for the grid lines and it will be important to liaise with these companies to take account of up to date information on the location and technology of the grid lines and substations.

6. We agree that the Scottish Natural Heritage (SNH) guidance '*Assessing the Cumulative Impact of Onshore Wind Energy Development*' (March 2012) is the best available guidance on the cumulative assessment of windfarm infrastructure. We also refer you to the 3rd Edition of the '*Guidelines for Landscape and Visual Amenity Assessment*' and its advice on cumulative landscape and visual amenity assessment. We would suggest that reference is also had to '*Siting and Designing Windfarms in the Landscape*', SNH, Version 1 (December 2009).
7. With regard to guidance on visualisations we are aware that the SNH guidance '*Visual Representation of Windfarms*' (2006) is currently being updated and we therefore suggest there is further dialogue between us on the details of the visualisations such as image size, focal length etc. This would allow all parties to hopefully agree on these matters within an agreed timetable for the assessment and enable us to take account of any emerging guidance.
8. We suggest that Pentre Tump and Cemmaes 3 windfarms are included in the assessment. If no appeal to the refusal of planning consent for the Pentre Tump windfarm is received by June 2013 this project could then be removed from the assessment. An appeal to the refusal of planning consent for the Cemmaes 3 windfarm has been received by Powys County Council. This windfarm should therefore be included in the cumulative assessment.
9. We do not agree that there is no potential for significant cumulative impacts between Strategic Search Areas (SSAs) B and C, and between these SSAs and SSA D. The purpose of this exercise is to determine whether there are such significant cumulative impacts. An example of a potentially significant cumulative impact between the SSAs is that between the Llaithddu/Llandinam windfarms and three Trannon Moor windfarms on the Caersws Basin and the Clywedog valley. We suggest that if additional work is completed on this matter to justify your position then this can be further discussed with PCC and NRW and the scope revised as necessary.
10. As previously stated in an email dated 28 March 2013 we consider that single turbines need to be considered in the assessment as this could be a significant issue. NRW and PCC can provide information on consented and planned single turbines. We would welcome further discussion on the study area for single turbines. We would suggest initially that those within and adjacent (within 5-10km, depending on size) to the SSAs need consideration e.g. the single turbines and associated grid lines consented and under consideration to the north-east of the Llandinam windfarm which will be in the foreground of views of the Llandinam windfarm and Llandinam 132kV line.
11. We agree that both assessment scenarios in paragraph 6 of your letter will need to be assessed. However we will need to further discuss with you the extent to which operational windfarms form part of the respective baseline assessments and, where relevant, the degree of influence of these on the scheme specific LVIA. As discussed above we consider that some scoping stage windfarms should be included in the assessment. It will also be necessary to agree a cut-off date for inclusion of new windfarms submitted as applications and we would suggest this can be done as part of the agreement of a timetable for production of the assessment. For each assessment scenario the combined and sequential effects, as defined in the 3rd Edition of the '*Guidelines for Landscape and Visual Amenity Assessment*' (paragraph 7.18 and table 7.1), should be assessed for all scheme

combinations.

12. We consider that the proposed grid connections need to be included in the cumulative assessment. The grid connections are an integral part of the proposed windfarms. We are also aware that the grid providers' default position is that the grid connections will be by means of an overhead line. Other significant windfarm infrastructure will also need to be included.
13. With regard to paragraph 8 in your letter we agree that assessment of sequential effects should apply to main roads, promoted tourists routes and long distance trails. We would advise that national cycle routes, long distance regional trails (in addition to national trails) and the Cambrian Railway Line are also included in the assessment of sequential effects. We may have further comments on sequential analysis when we have seen the cumulative plan and ZTVs.
14. With regard to paragraph 10 in your letter we require further information and clarification as to your approach. We do not agree that the Powys Landscape Character Areas are the appropriate level 3 baseline data for the windfarm LVIA on their own. They need to be assessed by additional reference to the underlying LANDMAP aspect areas. We also refer you to the CCW (now NRW) LANDMAP Guidance Note 3. This guidance is currently being revised and we will notify you when this has been completed.
15. It may be worth considering the production of a video montage to illustrate moving along key routes or alternatively wireframe 'drive throughs' along key routes. The methodology for this would need to be agreed.
16. The current methodology does not explicitly mention the provision of ZTVs. Cumulative ZTVs will need to be prepared for all schemes in both assessment scenarios and for all scheme combinations. Following from this we will need to agree viewpoints and important routes for consideration and these will need to be shown on the ZTVs. It is unclear if the four parties intend to agree a common set of viewpoints and clarification on this would be welcomed.
17. The visualisations should be presented as 90° views. All wireframes should be labelled with the recommended viewing distance and all other information recommended by best practice guidance including nearest turbine, site names and project status. On the same page a thumbnail location plan should be provided and care should be taken to clearly show the location of the visualisation within this plan along with a 10 figure grid reference.
18. We agree to the assessment of residential (visual) amenity to a distance of 2.5km but reserve the right to further amend and extend this distance to 5km in certain locations when further information as been provided.
19. With regard to paragraph 7 we note that you intend to use the current information available for the Llandinam 132kV line. We suggest that this is discussed with the applicants for this project as we are aware that this project may be revised. However use of the current information would appear to represent the worse case scenario.

We hope these comments are of assistance. If you have any queries or comments on the above, please do not hesitate to contact Trystan Mabbitt or myself. As you have noted in your letter of 4 March 2013 we look forward to agreeing many of these points in a Statement of Common Ground.

Yours sincerely

Carol Fielding

Dr Carol Fielding
Arweinydd Tim Maldwyn
Team Leader Montgomeryshire