

OUTLINE STATEMENT BY POWYS RAMBLERS AREA COUNCIL

Powys Ramblers are part of Ramblers Cymru, formerly the Ramblers' Association.

Ramblers Cymru's policy on renewable energy is currently being revised, and will be finalised at the organisation's Welsh Council in March. Reference to the adopted policy will be made in Powys Ramblers' statement of case. This outline statement is made in the meantime.

Powys Ramblers believe that:

- in order to combat man-made climate change, carbon emissions should be reduced through production of renewable energy;
- renewable energy should be sustainable in the fullest sense, taking account of impacts on landscape and the walking environment as well as carbon emissions;
- planning for renewables and wind power should be more integrated: there are too many competing schemes, proposed wind farms have been divorced from grid connections, and the decision-making process is fragmented and confusing;
- large scale onshore wind farms are especially damaging to landscapes, and the degree of harm may often outweigh carbon reduction benefits; and
- Welsh Government policy in TAN8 should be revised in order to strike a better balance between the environmental costs and benefits of wind power.

Even as it stands, TAN8, in conjunction with Policy E3 of the Powys Unitary Development Plan (UDP), provides a sound basis for considering landscape impact alongside renewable energy requirements in National Policy Statements and Planning Policy Wales. Read together, TAN8 and Policy E3 indicate that the scale of wind farm development in Strategic Search Areas (SSAs) should be restricted so as to minimise harm to the wider environment.

TAN8 contains indicative targets for megawatt (MW) output in each SSA. The targets may not set a maximum, but they do indicate an order of magnitude. They do not mean that the scale of wind farm development in each SSA should be limitless. Indeed, Welsh Government ministers stated in 2011 that the targets should be seen as 'upper limits'.

The total output from operational and proposed wind farms (above and below 50MW) considerably exceeds the TAN8 indicative targets, especially in SSA C. If all were to be developed, the number and height of turbines would overwhelm the landscape. Cumulative harm would greatly outweigh any energy benefits.

Proposals that would cause unacceptable landscape harm would conflict with the objectives of UDP Policy E3(1) and should be refused permission. In no circumstances should the total MW output in each SSA significantly exceed the TAN8 targets, which may already be too high in the absence of any detailed landscape assessment within SSAs. In SSA C, the Llandinam proposal alone would exceed the TAN8 target.

In considering inquiry Matter 4 identified by the Secretary of State, particular attention should be paid to the visibility of turbines from the many public rights of way* that cross the

application sites, to the proximity of turbines to rights of way, and to wider effects on the walking environment.

Several identified matters, including No 4, refer to the cumulative impact of the schemes subject to the inquiry, together with other permitted and proposed wind farms in the Powys area. It is impossible for this matter to be properly addressed when only the over 50MW schemes are before the inquiry.

*** NOTE ON THE ABSENCE OF ANY SPECIFIC MENTION OF PUBLIC RIGHTS OF WAY IN THE STATEMENT OF MATTERS TO BE CONSIDERED AT THE INQUIRY**

All five application sites are crossed by public rights of way, and the Carnedd Wen and Llanbrynmair sites by Glyndwr's Way. In consultation responses for Powys Ramblers, attention was drawn to the impact of the proposed wind farms on these routes. However, in stark contrast with Matter 7(c) relating to the proposed overhead line, matters identified in respect of the wind farms make no specific mention of their effects on the use and enjoyment of public rights of way. Wind farms Matter 4 cannot be considered without reference to visibility from public rights of way within and adjacent to the sites. The omission of these routes from the identified matters is inconsistent and anomalous, and should be rectified.