

**STATEMENT ON BEHALF OF THE POWYS AREA COUNCIL OF RAMBLERS
CYMRU**

1. Ramblers Cymru (formerly the Ramblers' Association in Wales) adopted a revised policy on renewable energy at its Welsh Council on 25 March 2013 (appended). This statement is based on that policy.
2. Powys Ramblers accept the need for renewable energy in order to combat man-made climate change, along with the principle of concentrating on-shore wind farms in order to avoid proliferation. But renewable energy should be sustainable in the fullest sense, taking account of cumulative impacts on the landscape and walking environment as well as carbon emissions. Large scale onshore wind farms are especially damaging to landscapes, and the degree of harm may outweigh carbon reduction benefits. If all the wind farms now proposed in SSAs B and C (above and below 50MW) were to be built, the amount, height and scale of turbines and grid connections would overwhelm the landscape. The development would not therefore be sustainable.
3. All five sites before the inquiry are crossed by public rights of way, and others are in close proximity. When seen at close quarters, the rotating blades of groups of massive turbines around 120m high would dominate the surroundings and spoil appreciation of the countryside. Some people may feel intimidated or deterred from walking along affected routes, even if turbines were to be set back from public rights of way by the minimum distance (equivalent to turbine height to blade tip) recommended in TAN8 Annex C paragraph 2.25. Users of rights of way, including Glyndwr's Way, would be one of the main groups adversely affected by the proposed developments.
4. In conjunction with Policy E3 of the Powys Unitary Development Plan (UDP), TAN8 provides a basis for balancing the scale of wind farm development against national renewable energy requirements, including those in National Policy Statements (NPSs) and Planning Policy Wales (PPW). As it is the only policy document to provide guidance on the scale of development within SSAs, TAN8 is critically important.

5. TAN8 Annex D paragraph 8.4 accepts significant change in landscape character within SSAs from wind turbine development, but that must be read alongside the indicative capacity targets in Table 1. The targets are not definitive (TAN8 paragraph 2.5), but that does not mean that the amount of development (in MWs) in each SSA should be limitless. There are several reasons for that interpretation.
6. First, if the intention was limitless development, TAN8 would have said so rather than introducing a numerical target. It could equally have said that the targets set a minimum output, or that ‘at least’ that amount should be achieved in each SSA. No such words appear. TAN8 paragraph 2.5 refers to ‘practical, technical and/or environmental reasons why the capacity may be more or less than that indicated’. It does not say that output could exceed the capacity for reasons of power generation, or simply because of rival market-driven applications.
7. Second, for the above reasons, most people reading TAN8 in draft (or subsequently) would not have thought that the indicative capacity targets imply that any amount of development would be acceptable. Indeed, the footnote to Table 1 says that the targets represent a one third reduction on the ‘maximum capacities’ identified by consultants, allowing ‘local discretion in identifying the best sites’. There has been no subsequent assessment of the SSAs as a whole, perhaps using the LANDMAP system, to show that those maximum capacities could be exceeded without landscape harm.
8. Third, TAN8 paragraph 2.4 states that the SSA boundaries are at a ‘broad brush’ scale, and that refinement of SSAs to optimise development is a matter for local planning authorities. The flow chart in TAN8 Annex D then recommends that potential wind farm sites within SSAs should be identified by assessing landform and similar characteristics. The draft Interim Development Control Guidance (IDCG) for Onshore Wind Farm Developments, issued by Powys County Council (PCC) in 2008 but never adopted, did not include any such assessment of potential sites or a revised assessment of capacity. However, there remains an implicit recognition in TAN8 that parts of SSAs may be unsuitable for turbines.
9. Fourth, although TAN8 was issued some years ago in 2005, PPW paragraph 12.8.13 makes it clear that the two documents are to be read together. There is no basis for

thinking that the TAN8 indicative targets are out-of-date or superseded in some way by PPW or NPSs.

10. Fifth, the statements by Welsh Government ministers in June and July 2011 quantify the maximum indicative capacities in TAN8 and indicate that they should be seen as ‘upper limits’. The statements clarified Government policy in response to public concern about the number and scale of proposed wind farms and grid connections. Although not subject to consultation, ministerial statements carry significant weight.
11. According to information submitted by PCC at the pre-inquiry meeting, operational and proposed wind farms in each SSA considerably exceed the TAN8 indicative targets:

Operational and proposed wind farms by SSA

SSA B	MW
Operational	63.35
Permitted	28.0
Current DECC applications	219.0
Current PCC applications	132.5
Total	442.85
NIP pre-application scoping	128.0
 Total including NIP scoping	 570.85
 SSA C	
Current applications (DECC)	117.7
Current applications (PCC)	124.0
Total	241.7
Llandinam Repowering	126.0
 Total including Llandinam Repowering	 367.7

12. In SSA B, operational and application schemes amount to 442.85MW against the TAN8 indicative target of 290MW. The maximum capacity identified by consultants (paragraph 7 above) is 430MW, close to the total current schemes. However, a further 128MW of potential NIP schemes in scoping brings the overall total to 570.85MW. This figure exceeds the maximum capacity by about 33%.

13. The situation in SSA C is even more serious. The DECC applications alone would exceed the TAN8 maximum capacity of 98MW. When applications before PCC are included, the total of 241.7MW would exceed the capacity by about 147%. The Llandinam site is just outside the SSA boundary, but the proposed new wind farm would be seen in close association with the Llaethddu development in particular. The draft IDCG (paragraph 8 above) included the existing Llandinam wind farm in its refined SSA boundary; it is within the 5km zone from the existing boundary (TAN8 Annex D paragraph 2.2). On that basis, the overall output would reach about 375% of the TAN8 maximum. The Llandinam scheme should therefore be included with proposals in SSA C when balancing renewable energy benefits against landscape impact and assessing the overall sustainability of development.
14. There are inconsistencies between the above data submitted by PCC in respect of SSA B (but not SSA C) and Welsh Government data in 'Review of Wind Farm Developer Interest 2012'. The latter also excludes NIP schemes in scoping, unlike PCC, and it is not clear whether 2012 information is fully up-to-date. Neither takes account of increasing numbers of large single turbines on farmland.
15. It is apparent from the Welsh Government data that some SSAs, including B and C, have been more successful than others in attracting developer interest. The total of 2032.3MW is however broadly consistent with PPW Table 12.1. We do not accept that any shortfall in other SSAs should be made up by more intensive – and more cumulatively harmful – development in SSAs B and C. That would also be unreasonable in the absence of any evidence as to the reasons for such shortfall and whether it is likely to be remedied.
16. All the current application schemes (before DECC and PCC) are inextricably related to each other by policy, proximity and cumulative impact. It would have been logical and sensible for them all to have been before the same inquiry. That would have enabled a view to be taken on those schemes likely to cause most landscape damage relative to the TAN8 capacities and/or to breach UDP Policy E3(1).
17. Inquiry matter 4 concerns cumulative landscape and visual impact. As it stands, it is very difficult to see how this vital matter can be properly considered when only the

DECC applications are before the inquiry. At the same time, any explicit conclusions on cumulative impact being either acceptable or unacceptable could prejudice consideration of proposals before PCC or subject to appeal. Conclusions lacking clarity on this matter would be equally open to criticism. This amounts to a serious flaw in the decision-making process on such major and controversial developments.

18. That said, the Inspector must deal with the applications before him. Our overall conclusions are:

1. The maximum indicative capacity targets in TAN8 establish an order of magnitude and carry significant weight. They do not signify that development should be unlimited.
2. The cumulative amount of wind farm development currently proposed (above and below 50MW) would considerably exceed those indicative targets in both SSAs and especially SSA C. Once the indicative targets have been exceeded, greater weight should be placed on landscape conservation.
3. If all current applications were permitted, the scale, height and extent of turbine development would overwhelm the landscape of both SSAs, seriously damage its quality and harm the walking environment.
4. The degree of harm would outweigh renewable energy benefits and would not be sustainable development. It would also be at odds with the objectives of UDP Policy E3(1).
5. Given that only the DECC applications are before the inquiry, the preceding conclusions should be taken into account when balancing environmental and other objections to the proposals against energy benefits.

Alan Rugman BSc(Econ), DipTP, MRTPI (rtd), Secretary, Powys Area Council,
Ramblers Cymru, June 2013