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To: Claire Jon
Mid-wales Cor

The Mid - Wales(Powys)
Conjoined Wind Farms Public Enquiry

27th September, 2013

Witness Statement

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I wish to object to the Carnedd Wen and Llanbrynmair wind farm proposals in SSA B, and also to Llanbadarn Fynydd, Llaithddu and Llandinam in SSA C, which are to be considered by this enquiry, for reasons set out in my earlier Outline Statement of Case (OBJ/699), and for those proposals in SSA B, as expanded upon below.

I am a 65 year old voluntary worker, I have worked for local wildlife trusts in Oxfordshire and Montgomeryshire for almost 30 years, mostly in a voluntary capacity, including for 15 years as a reserve manager. I have an extensive knowledge of the natural world and environmental issues and I'm an experienced surveyor of a wide range of habitats and species. I am also a passionate advocate of low-impact living, and of the Welsh countryside.

In the late 1970s and the 1980s, an act of extreme folly was committed when large swathes of Llanbrynmair Moor were drained and planted with forestry. This site was believed to have been one of the best examples of such upland habitat in Wales and would now be totally protected as a SSSI and probably a Special Area of Conservation (SAC). We should not now compound this folly by allowing enormous amounts of concrete and huge areas of other impermeable surfaces on the site of Llanbrynmair Moor, in the form of Carnedd Wen and Llanbrynmair wind farms, particularly in the light of current thinking of the value of such land for its ecosystem services. The moor can be returned to its former health by gradual removal of conifers, with blocking of ditches and drains as a part of the process, without 'habitat restoration projects' which include industrial infrastructure!

'Important ecosystem services provided by the uplands and lowland heathlands of Wales include carbon sequestration in peatland sites, catchment water services including water quality and quantity regulation (important for areas beyond the borders of Wales due to water transfers), nutrient buffering,(etc).....'that are highly significant to the Welsh economy.'

And: *'Welsh soils represent a significant store of carbon, currently estimated at 410 million tonnes, of which approximately one third is in the form of peat (ECOSSE 2007), despite the fact that peat*

deposits occupy only 3% of the surface area of Wales. (UK National Ecosystem Assessment: Technical Report)

There is deep peat over at least 60% of the proposed Carnedd Wen site. The stated volume of peat to be extracted during construction is 187,000 cubic metres, though the figure is significantly lower in the Non Technical Statement (183,842 cubic metres) than in the Carbon Balance section of the main document! For Llanbrynmair, figures for peat to be excavated is 'about 121,000 cubic metres'. Carbon will be lost from peat during its handling and reinstatement during 'restoration' – Npower renewables figure is 10%. Carbon losses are even greater, 5 times as much over the 25 year life of the wind farm, from drainage around built features, such as turbines.

The Carbon Balance Study methodology for the Carnedd Wen proposal was carried out using an out-of-date 'tool' developed by the Scottish Government some years ago, and not taking into account the current thinking on the value of land for its ecosystem services. In addition, this tool had to be 'modified' for this site as it was not designed for use with habitat restoration projects.

This methodology also did not use a complete carbon audit; eg. the 'tool' only considered the carbon emitted during manufacture of the turbines and carbon emitted during the manufacture of cement (which is the 3rd largest, man-made Co2 emitter) used for turbine foundations.

Nothing else, such as: materials (including cement) for ancillary structures, steel reinforcement for foundation bases, materials for extensive roadworks and new power infrastructure and the shipping and transport of everything, is taken into account, or additionally, the losses to ecosystem services.

NB. There seems to be a conflict between the use of this Scottish Government tool and Nrl's consultant, Halcrow's own tool, leading to a large (and potentially very important) difference in the figures for carbon release and consequently, payback time. Nrl have used the lower figures.

Non -avian Ecology.

Both Carnedd Wen and Llanbrynmair Non Technical Summaries mention having done bat surveys but I have been unable to find the actual data for either proposal. The Bat Conservation Trust have concerns that research into the siting of wind turbines has not been sufficiently rigorous. BCT would like to see monitoring at existing wind farm sites, and monitoring of all new turbines, large or small. 'We would also urge that full impact assessments of the effect on bats are undertaken, and for post-installation monitoring to be made a planning condition.' A Mammals Trust UK (MTUK) report in 2006 by Barry Nichols (University of Aberdeen) and Paul Racey stated 'It is now becoming apparent that bats are even more vulnerable to fatal collisions with wind turbines than birds, although, as yet, the reasons for this aren't clear.' Apparently, bats seem to be attracted to stationary as well as moving turbines – studies in Europe have reported bats foraging close to the blades.

Other **biological surveys** seem very inadequate, but by their very nature, surveys just capture a 'snapshot in time' and they need to be repeated many times, at different times of day, seasons etc. to give a truer picture, something that wind farm developers seem reluctant to do! As an example, there seemed to be only one badger sett reported for the whole of the Llanbrynmair site. Some species, such as Pine Martin, are notoriously difficult to track down. And the current thinking on Dormice, for example, is changing as knowledge increases – they are now known to inhabit a much wider range of habitat than previously thought: therefore, surveys just of woodland or hedgerows with hazel are totally inadequate.

RES however do admit that: '*Overall, the study area as a whole is considered as nationally important in a UK and Welsh context for its breeding bird community.*'

Late submissions by both developers of significant changes to their original plans, and the sheer size of those plans have left insufficient time for thorough scrutiny. The website of the Llanbrynmair proposal in particular is non-intuitive and difficult to negotiate and the 'average' person needs an enormous amount of determination to find anything. The Non Technical Statement is poorly written with mistakes and missing text, so the meaning is not always clear.

This document does however admit to '*significant (major) long term effects on the character of the application site, and along localised parts of the off-site access road between Llanerfyl and Talerddig (where road widening, passing bays, structural work to bridges and new sections of track are being constructed)*' It also states that there will be '*significant (major) effects on properties and road users' but that it will be 'short-lived.'*

This proposal would change the whole character of this normally very quiet rural road, which would become a 'rat-run,' including for HGVs, between the A470 and A458 if such 'improvements' went ahead!

And as for 'short-lived' – hugely disruptive road works of unspecified duration will precede the 2 year wind farm construction period, of 6 days a week working, from 7am to 7pm! In addition, this does not take account of other wind farms under proposal for this area.

Two years alone is a significant period of time to anyone, but it is especially so to the older members of a community – it could be their remaining lifespan.

RES also admit to their proposal having a 'significant' effect on an important national trail, Glyndwr's Way. This is an understatement as the trail passes through the middle of the proposed wind farm and also uses a section of the Llanerfyl to Talerddig road. They state that areas of construction activity will be cordoned off to exclude the public but there is no mention of alternative routing.

As the Llanbrynmair wind farm is so close to the Carnedd Wen proposal, RES should be required to use the Carnedd Wen access as a condition of their proposal being permitted. (Should Carnedd Wen also be permitted).

Property values and sales in this area are already impacted just by the threat of wind farm development. I personally know 2 households whose properties have been on the market for a considerable length of time and one was told by their estate agent that the possibility of wind farms was putting off potential buyers.

Finally, I would like to say that for a great many people, locals and tourists alike, the view from the A458 just before dropping down into Llanerfyl is one that many cherish; it has a great 'aah' factor! That view would disappear, possibly for ever, if these proposals are allowed. For this reason, and particularly for those above, I ask that you reject the proposals for all five wind farms before you.

Judith K Stretton (Mrs)

Bryn Awelon

Llanerfyl