

Llandinam

**Leigh Gareth (EDU)**

**From:** Sandi Willmott [sangerad@btinternet.com]  
**Sent:** 16 May 2008 17:47  
**To:** Leigh Gareth (EDU)  
**Subject:** FW: FORMAL OBJECTION TO PLANNING APPLICATION BY CELT POWER FOR THE EXTENSION OF THE EXISTING LLANDINHAM WINDFARM, POWYS, UNDER THE 1989 ELECTRICITY ACT

-----Original Message-----

**From:** Sandi Willmott [mailto:sangerad@btinternet.com]  
**Sent:** 16 May 2008 15:39  
**To:** 'garreth.leigh@berr.gsi.gov.uk'; 'stevep@powys.gov.uk'  
**Subject:** FORMAL OBJECTION TO PLANNING APPLICATION BY CELT POWER FOR THE EXTENSION OF THE EXISTING LLANDINHAM WINDFARM, POWYS, UNDER THE 1989 ELECTRICITY ACT

Dear Sirs,

I wish to lodge a formal objection to this proposed development.  
 The brief case supporting this objection is presented below.

#### COMMENT ON THE CLAIMED BENEFITS OF WINDPOWER

Firstly let us consider the potential benefit of such a development against which any disadvantage should be balanced. I should commence by saying that as a consultant engineer with many years experience of assessing technical papers, on considerably more complex issues, I have carried out extensive, independent and unbiased research on the stated benefits and disbenefits of wind turbines as a means of providing bulk power to the Grid. Much of the published information and data demonstrating the problems and issues associated with this form of generation is either generated or supported by eminent bodies (such as the Royal Academy of Engineering) or individuals, and in many cases is based on data published by the Wind Energy sector (BWEA) or BERR/DTI. Careful scrutiny of the vast quantity of available information, including the formal views of those European countries hitherto committed to this form of generation (Germany and Holland) leads to the inevitable conclusion that this is categorically not an effective/efficient means of electricity generation. Far from reducing the levels of pollutants it is easily demonstrable that there are NO SAVINGS due in large part to Intermittency and the need for up to 90% back up (spinning reserve) and the construction issues such as cement production, CO2 release through peat disturbance and construction traffic. Additionally, independent professional assessments have identified that far from being cheap, wind generated electricity is indeed the most expensive. All the evidence is available on the Web and almost certainly known to you/your Department so I will not waste your time or mine relating it at length herein.

Additionally, for the reasons identified in brief above this is not even a short to medium term solution to the impending Energy Gap, what is worse is that concentration of effort and resources has led to a significant delay in the provision of more effective means of generation, namely conventional and New Nuclear Build, which are inevitably to be built.

Notwithstanding the political obsession there is in short NO IDENTIFIABLE BENEFIT TO THIS FORM OF GENERATION. If there were to be then many may accept the problematic issues described below.

Now let us address some of the Disadvantages/Problems not already identified above;

#### HEALTH and SAFETY

Of greatest concern to myself and many others is in the area of Health and Safety. In particular, as this development is located in the Mid Wales area used extensively by the RAF for low flying activity, we are very concerned about the possible impact the new turbines, both in size and number, will have on the safety of such activity. It is now undeniable, since recent flight tests have shown, that turbines individually and en masse positively and destructively interfere with Air Defence radars. Being deeply concerned about this issue I have had an ongoing dialogue with both MOD Defence Estates and the Air Staff who although helpful, have failed to provide any positive evidence that any meaningful Risk Assessment has been undertaken with regard to air safety during low flying. Now the concerns over radar interference is in the public domain it is absolutely essential that consideration of all further developments is suspended until both the RAF and the public are satisfied there is NO additional risk to military low flying operations. There must be a clear public statement that there are no risks. Alternatively, if these developments are to proceed on the scale now envisaged( ref recent WAG Energy Route Map and Powys IDCG pronouncements on capacity) then the MOD will need to address cessation of such training.

Another area of great concern, born out by many investigations, which has been proven to effect individuals, is the potential effect of noise, low frequency vibration and Amplitude Modulated sound. Recent upholding of an objection by the seismic monitoring station at Eskdailmuire in Scotland underlined the case for ground born vibration causing problems at not inconsiderable distances - many kilometres. Additionally there are many well documented cases where individuals have suffered health problems as a result of audible noise and low frequency, inaudible vibrations. Yet the only noise standard required of the developers is that of ETSU R 97, which is now considered totally inappropriate for the form of noise annoyance created by wind turbines. Moreover, it is the only noise standard that seems to fail to recognise that noise at night can be more disturbing than during the day and that the type of noise is as much, if not more of a problem than the absolute sound level measured in dB. In this respect the amplitude modulation effect one gets with a number of sources, like several turbines, is extremely disturbing and is not masked by any sensible level of background sound. I understand that this standard is so out of date that it is about to be superseded.

Additionally, on the topic of the affects on individuals health, is the certainty for those in certain positions of shadow flicker will suffer some form of problem, especially if epileptic. As flicker is not merely visually annoying but can under certain circumstances be medically harmful.

The Council, its officers and BERR have a professional duty of care to the community and unless there is positive evidence, that is open to independent scrutiny, that all the above are guaranteed not to cause harm, then you are failing in your duty and moreover are culpable should there be any health and safety issues arising. This especially applies if, God forbid, there is an incident

involving low flying aircraft.

#### CONSIDERATION OF THE FULL SCALE OF ALL DEVELOPMENTS

It is abundantly clear that the full scale of the envisaged windfarm developments will significantly exceed the spirit of the guidance given by the original WAG TAN 8 document (70 MW for this area) and that contained within the Powys early IDCG draft guidelines, on which there was considerable public debate. The overall impact of large scale developments in an essentially rural, upland landscape will do immeasurable harm.

Moreover, in legal terms I believe, having taken professional advice, that despite TAN 8 being a guidance document the apparent intention to exceed the guideline by such significant levels is against the spirit and the intentions of your own legal guidelines. Certainly, taking the overall scale, BERR and Powys CC should not be considering each application in isolation but must hold each back until all similar applications are received whence an overall assessment can then be made. The recent modification of the targets both by WAG and by Powys in their IDCG appear not to give any serious consideration to the large scale industrialisation of Mid Wales and its follow on impact to both the population and visitors and are somewhat legally questionable.

The only sensible move is to reject or hold this application, await the remaining applications and to then hold a Public Enquiry where considerations of the overall impact of ALL the possible developments can be assessed. This would then permit other stakeholders, like the MOD, to make a similar overall impact assessment.

#### CONSIDERATION FOR THIS PARTICULAR EXTENSION

Although it is recognised that a windfarm clearly exists at this location its presence in no way negates the above arguments. It may be argued that this proposal is a mere extension of a current site but careful examination of the considerable increase in size of the turbines and their location on a prominent upland ridge, will have considerable additional impact on the communities for many tens of miles around. Moreover, on the issue of the safety of military low flying, as you will be aware this ridge is regularly over flown at low altitude and the increase in height of these obstacles must have a deleterious impact on those operations.

In terms of the effectiveness of the proposal in terms of power generation, one only has to travel the A 483 regularly to observe how frequently the turbines fail to turn and therefore not generate power. The increase in size will not improve the intermittency of the output by any significant degree.

So the Balance of Risk versus value is not achieved.

#### SUMMARY

The above is a short consideration of just a few of the many complex issues associated with windfarms of which I feel sure you are aware. Given the Benefits are extremely questionable and the disadvantages, especially H&S risks, are many and well documented, there is absolutely no sensible balance of argument that can permit this and similar developments to proceed.

I therefore urge you to reject this and all similar applications and call a Public Enquiry into the whole issue.

Regards

GFA Willmott CEng FIMechE

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