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10 February 2010

Secretary of State  
Department of Energy and Climate Change  
Energy Group, Energy Development Unit  
Area 3A, 3 Whitehall Place  
London  
SW1A 2AW

Dear Secretary of State

APPLICATION BERR/2008/0003: PROPOSED REPOWERING ETC OF  
LLANDINAM WIND FARM, NEWTOWN, POWYS: SUPPLEMENTARY  
ENVIRONMENTAL INFORMATION (SEI)

The following representations are made on behalf of the Powys Area Council of  
Ramblers Cymru.

Powys UDP Policy E3(1) requires an assessment of cumulative as well as individual effects of a wind farm development on the environment and landscape quality. However, the photomontages in the SEI do not take account of all proposed wind farms in Strategic Search Area (SSA) C: schemes at Hirddwyel, Bryngydfa and Neuadd Goch are omitted. All these proposals have been in the pipeline for some time, and it is up to developers to cooperate in providing full information to the public and decision-makers. As it stands, it is impossible to properly consider the proposed Llandinam repowering against Policy E3(1), and therefore to be satisfied that the submitted scheme would be in accordance with the development plan.

In my letter of 11 June 2008 in response to the original application, we asked for the northernmost turbines to be deleted because of their prominence in views from the north and their siting on the plateau edge well away from the existing wind farm. The visual impact of these turbines is clearly demonstrated by Figures S6-6A, S6-7 and S6-8, which show that the area north of the repowered wind farm would be exposed to views of turbines to a much greater extent than at present. We also note that none of the photomontage viewpoints are within this area. While welcoming the deletion of turbines T22, T23 and T24, we seek deletion of T15 and T21 as well. For the same reasons, consideration should also be given to deletion of T7, T14 and T20.

The SEI does not appear to recognise that most of the application site is access land under the CROW Act. There must be no restriction of access other than that arising from construction work and the base of any turbines themselves. The fact that the public have an access right across nearly all the site is also relevant to public safety in respect of ice throw and possible structural failure of turbines. No doubt the Countryside Council for Wales will have more to say on this matter.

Nevertheless, we accept that turbine sites would meet the set-off standard from public rights of way in TAN8. We also welcome the proposed provision of a new route away from turbine T20, notwithstanding the comment above about its prominence.

The applicants maintain that the site is within SSA C by virtue of the revised boundary in Powys County Council's Interim Development Control Guidelines for onshore wind farm developments (2008). On that basis, the proposed output of 89.7 or 117MW would exceed the indicative capacity target of 70MW for SSA C in TAN8. It would also nearly meet or exceed the maximum capacity of 98MW identified in research by Garrad Hassan. In statements in June and July 2011, the Welsh Government regards these figures as 'upper limits' for wind farm development. It follows that, if the proposed Llandinam repowering were to be permitted, there would be no need for wind farms to be spread across undeveloped open land elsewhere in SSA C.

The sheer scale and extent of other proposed wind farms in SSA C would also have a severe impact on Glyndwr's Way, a national trail in which a considerable amount of effort and public money has been invested over many years. The same applies to proposed wind farms in SSA B. If all proposed wind farms in both SSAs were to be built, the value of many miles of the trail would be destroyed and the integrity of the whole route would be undermined.

Yours sincerely



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Area Secretary, Powys Ramblers

cc Trystan Mabbit, Powys County Council

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