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CYMDEITHAS Y CERDDWYR / RAMBLERS' ASSOCIATION

CYNGOR RHANBARTH / POWYS AREA

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3 March 2012

Trystan Mabbitt
Specialist Planning Services
Powys County Council
The Gwalia
Landrindod Wells
LD1 6AA

Dear Mr Mabbitt

APPLICATION P/2012/0040: PROPOSED NEUADD GOCH WIND FARM, DOLFOR

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

Ministerial statements in June and July 2011 make it clear that indicative capacity targets for Strategic Search Areas (SSAs) in TAN8 should be regarded as 'upper limits'. TAN8 might previously have been interpreted as placing no limit on the scale of wind farm development in SSAs, but the Welsh Government has now indicated that any such interpretation of its own policy no longer applies. The Council's decisions on planning applications should be determined in the light of that guidance, read alongside UDP Policy E3.

The indicative capacity target for SSA C is 70MW, or 98MW on the basis of research by Garrad Hassan. If the Llandinam wind farm is taken to be within SSA C, as assumed by the application for repowering, and if the Secretary of State were to grant permission for that proposal, the capacity target would already be met. On that basis, the Neuadd Goch application should be refused. Even if the Llandinam site were to be treated as outside the SSA, the total output from all other wind farm schemes within the SSA would significantly exceed the TAN8 targets. They cannot all be permitted without serious conflict with Welsh Government guidance in 2011. That guidance obviously takes account of the landscape impact of wind turbines and grid connections, bearing in mind that modern turbines are now considerably taller than in 2005 when TAN8 was issued. Moreover, if the scale of development were significantly to exceed the TAN8 limits, cumulative landscape quality would thereby be unacceptably compromised in breach of UDP Policy E3(1).

It follows logically that planning applications should be determined in a way that minimises conflict with the environmental objectives of Policy E3. There are good grounds for believing that the Neuadd Goch proposal would be at odds with that approach, given the extent to which turbines would be seen at close quarters from roads and public rights of way.

Several proposed turbines would be significantly closer to public rights of way than the distance advised in TAN8 Annex C paragraph 2.25. This raises important public safety concerns in respect of ice throw and structural failure of turbines. Many people would also be intimidated by having to

pass so close to such enormous moving structures. We therefore welcome the proposed permissive diversion around turbine T3, and acceptance in the Environmental Statement of the need for similar treatment of T7. Were permission to be granted, such measures should be secured in a planning obligation. The Statement does not however refer to mitigating measures at turbines T5 and T9, which Table 11.4 shows to be far below the TAN8 standard. Alternative routes should be waymarked on the ground, even though this part of the application site is access land under the CROW Act.

Four of the turbines and related access tracks would be within access land. Any temporary fencing or other loss of access during the construction period must be minimised, and any notices at any other time should not have the effect of deterring the public from exercising their access rights. The Countryside Council for Wales may have more to say on this matter.

Yours sincerely

A handwritten signature in black ink, appearing to read 'A. J. Rugman'.

ALAN RUGMAN BSc(Econ) DipTP MTRPI (rtd)
Area Secretary, Powys Ramblers