

Tan-y-Glog
Cwmystwyth
Ceredigion SY23 4AF

July 19th 2010

To:- Eluned Lewis
Community Liaison Officer
SSE Renewables
Swyddfa 101
Y Plas
Machynlleth
Powys SY20 8ER

Re: PURLUMON – NANT-Y-MOCH WIND POWER STATION PROPOSALS

Dear Eluned Lewis

Please see below the response of the Cefn Croes Action Group to SSE Renewables preferred proposals for the wind development on the Pumlumon-Nant-y-Moch uplands in the Cambrian Mountains. The response relates to the public exhibition held on June 19th 2010 in Capel Bangor Community Hall which I attended.

Inadequacy of the limited consultation:

Although this was the second series of public exhibitions held in village halls around the proposed site, there remain many unanswered questions and uncertainties.

We are concerned that the size of this significant proposal will have a much greater impact on Mid Wales than merely the surrounding villages. It is therefore regrettable that there are no plans for the poster display boards and explanatory material to be exhibited more widely. An exhibition in the foyer of the new Welsh Assembly Government buildings, Ceredigion Council Offices on the same site in Aberystwyth, the Aberystwyth Art Centre or in gallery space in the National Library of Wales would bring this vitally important plan to the attention of a much wider audience.

We feel there should be a major independently chaired meeting in Aberystwyth in order that both sides can make their case once the planning application is finally ready for submission.

The community liaison officer's availability in Machynlleth on Thursdays, and the closing date for responses of July 30th should have been more widely publicised through the local press earlier during the consultation process. We are concerned that only a very small number of local residents know about these plans, notwithstanding the belated letter from the Project Manager in the 15th July edition of the Cambrian News.

It is of concern that the consultation responses and completed questionnaires will be analysed 'in house'. The developers have a vested interest in emphasizing any support, and down-playing any opposition. There is no guarantee that the assessment of feedback will be impartial.

Specific points from the consultation:

Access:

We are most surprised that the access route for turbine components and construction traffic is not yet finalized, even at this late stage in the development process. If, as appears likely, a deal is done with FC Wales for access off the A44 via Nant-yr-Arian offices and through the car park, we have concerns about the continuing safe functioning of the very popular, publicly-funded visitor centre, red kite feeding station, mountain biking operations and children's play area.

Transport:

The trial route from Swansea to Mid Wales has not been honestly assessed. The low-loader for a blade consignment did not maintain its full length during the trial run, telescoping to half its length at roundabouts, and other 'pinch-points', in order to negotiate these. We shall expect to see reports from the Trunk Roads Agency, WAG, and Ceredigion Council Highways Dept. as to the cost of any necessary street furniture, road and pavement modifications and delays to commercial and tourism traffic.

Absence of WAG and FC representatives:

It was very disappointing that no representatives from WAG (where ministers claim to 'own' the National Forest Estate holdings), nor the current land managers, the Forestry Commission Wales, were on hand to answer questions. There was therefore no opportunity to ask WAG how they will deal with the conflict of interest questions, inherent in their claimed ownership of public forestry land, and their designation of search areas in which they have a direct pecuniary interest. We were unable to discuss with FC Wales managers how they will manage this major land-use change from forestry objectives to industrialization.

We wish to know

- What lease rental-royalties will be payable to WAG?
- What business rates will accrue to Ceredigion and Powys Councils?
- What decommissioning bonds will be lodged with Ceredigion and Powys Councils?

Sponsorship:

Financial support for the National Urdd Eisteddfod and the Royal Welsh Show – the £5,000 sponsorship to each - is regarded by us as a ‘sweetener’ (bribe) to buy support from the local Welsh-speaking population around Talybont, to curry favour with Plaid Cymru, and score ‘brownie’ points with the organisers of the agricultural show. We are very cynical about the motives for these offers to the community and feel that they should not have been made in advance of the due processes of the planning procedure.

Ceredigion’s green energy production:

Ceredigion produces more electricity than it uses. Its hydro-power alone from Nant-y-Moch, is predictable and controllable and can supply all domestic needs in Ceredigion. Local residents derive no financial benefit re electricity costs from increasing numbers of wind turbines. In fact, our bills are some of the highest in the country. The average household consumption of 4,700 kwh per household as quoted in your literature, is not a true reflection for Mid Wales where we have no piped gas and many homes are heated with electricity.

Turbine lighting:

We are horrified by the prospect of lighting for the turbines, in order to comply with safety regulations for the CAA and MoD. Rural Mid Wales is one of the few truly ‘dark skies’ areas in the UK, and this rarity needs protection.

Peat damage:

The developers claim that areas with up to half a metre of peat will be avoided. We maintain that any disturbance of peat is unacceptable – whether it is 18 inches or 18 feet. The civil engineer currently in charge of SSE Renewables excavations was also in charge of the Braes o’ Doune peat disaster in Scotland, when the company was known as AIRTRICITY. Photographs and a report on this scandal have been sent in the past to WAG Ministers, FC Wales managers, Ceredigion Council, the Environment Agency and CCW. We are not reassured by claims from SSE Renewables that ‘lessons have been learned’.

PEAT IS TOO PRECIOUS AS A CARBON-SINK AND RARE HABITAT TO DISTURB OR DAMAGE IN ANY WAY.

Environmental audit:

There is a pressing need for an independent fully comprehensive environmental audit. Any proposals are incomplete without this. A ‘cradle to grave’ carbon balance calculation should be a pre-requisite for any development of this nature. This should include every aspect of ground disturbance, quarrying, concrete manufacture, turbine construction, transport, cables, pylons, sub-station etc. Further, the carbon-absorptive capacity of the

trees lost by clear-felling should be part of the audit. We do not accept the BWEA figures of 'pay-back time' of 6 – 8 months. *A hard copy of the Nayak et al (2008) studies is requested.*

Landscape effects and 'cumulative visual impact':

This question has not been properly addressed. Once again, *we request a copy of the photomontage for the view from the summit of Pumlumon.* The general public remains ignorant about the profound effects this development will have on our Special Landscape Area and the wider countryside of the Cambrian Mountains and the Ceredigion coast.

Grid connection Wales

No information about this was available at the public exhibitions. Subsequently, a diagram of 3 possible routes across swathes of Mid Wales to the east has been revealed. Given that these miles of pylons and overhead cables represent an essential and arguably profoundly damaging aspect of the development, we feel that the route of the grid connection should have been available for discussion.

CONCLUSION

Please register our continuing interest. We wish to be considered as a stakeholder/consultee in the planning process. The Cefn Croes development, which we opposed on environmental and landscape grounds, gave us the opportunity to gain knowledge and experience relating to wind farm developments.

We will send a full response once the planning application is submitted.

Yours sincerely

Dr HK Little (on behalf of the Cefn Croes Action Group)