

CYNGHRAIR HIRAETHOG ALLIANCE

An Alliance of the Ramblers' Association, CPRW Branches,
PACT, DART and CLOUT
Protecting the Landscapes of the Hiraethog Area

Martin Cole
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27th September 2011

Dear Mr Cole

CHA was set up to protect the landscape and living environment of the Hiraethog area. It is an alliance representing many people who have deep care for this part of North Wales. Following RWE's announcement of its consultation, CHA arranged a meeting of local people in Clawddnewydd on the 25th August. At that meeting attended by over 200 people, there was widespread and deep concern at the development proposals and a request that CHA act on their behalf in responding to the consultation invitation.

The 56 days that RWE has stipulated has not allowed a detailed analysis of the draft ES which covers over 2,000 pages of information. The technical summary on the other hand has reduced all the facts, figures and conclusions to such an extent that its information is platitudinous and suggests that most problems will be solved by mitigation and thus gives little help in understanding the magnitude of the effects of this development.

- 1. We ask that a more detailed and informative summary of the ES is produced to help the public understand what is being proposed and the effect it will have on this area.**

The 56 day consultation period has also come in for criticism not only for the short time allowed to analyse so much information but also the period in which it was scheduled: Aug 4th to Sept 26th covers the summer holiday period for most people including politicians, councillors and LA officers. LA Councils and Community Councils do not meet and holding meetings of local people is very difficult to arrange. This choice of start date suggests either a cynical attempt to minimise public comment or a mistake in scheduling it.

- 2. Please explain why this consultation period was chosen.**

Consultation or Disseminating information

One recurring complaint from local people is the impression gained by them that the exercise of consultation has been in name only and that the last two months have been spent by RWE informing us what its proposals are going to be rather than listening to our concerns. The general feeling is that issues raised have either been dismissed or have been answered as unwarranted due to mitigation measures which will be put in place.

In order to re-establish credibility of this consultation process, when you have decided on your responses to the comments you have received over the last two months please:

3. Inform us what elements of the ES and the scheme have been modified in response to the public's feedback.

Area is Remote

The ES creates a misunderstanding that the Clocaenog Forest is remote, up in the clouds and that the number of people that will be affected by the development is minimal. Within the ES:

- the word "remote" is used throughout
- a statement is made that "*low cloud obscures views to the upland landscapes of the Clocaenog Forest for a significant proportion of days each year*". This statement is then used as a mitigating factor suggesting that views of the turbines will be obscured.
- maps of the development site exclude all the villages that surround the forest
- analysis only covers specific properties within the development site and a 2km area outside it - even though the ES does admit that major impacts from up to 5km are likely to be significant.

In reality, the Clocaenog Forest is home to many people, contains businesses, farms, is a major tourist destination and is used as a recreation space by local people on a daily basis. It is only 5 miles from Ruthin and Denbigh and commuting distance from Liverpool and Manchester. The impression that the ES is trying to give about the location of the site is not only wrong but also indicates that the people carrying out the environmental assessments have very little knowledge of the area they have been studying.

CHA requests:

- 4. The word "remote" and descriptions of the development site that give the impression of it being remote are removed throughout the ES**
- 5. Remove the statement in para. 5.13.6 about low cloud or provide evidence to support it**
- 6. Revise the maps of the development site to include the surrounding villages of Betws GG, Clawddnewydd, Clocaenog, Cyffylliog, Derwen, Nantglyn, Llanfihangel GM, Pentrellyncymer.**
- 7. Include all properties within 5km of the site in the analysis of impacts**

of the development.

Water Supplies

70+ households within 2kms of the development rely on their own water supplies. In most cases there is no mains water supply nearby and without water their properties are uninhabitable. RWE has identified 24 properties that are at risk. Initially RWE withheld the identity of those 24, stating there was a confidentiality issue. It has been suggested to these 24 properties that with mitigation and temporary supplies during the construction period there should be no permanent problem. As many of these water supplies are spring based, the spring is highly unlikely to return after construction is completed if it is disturbed during excavations and construction. Other statements within the ES suggest a failure to grasp the scale of the potential problem, a lack of knowledge of what type of supplies they are and where these supplies originate. If RWE does not know where they originate how do you know whether your excavations will damage them?

Only a few people around here have been consulted about their water supplies. This is not good enough for a development of this scale that could affect such an essential commodity to so many people.

We notice from the ES (Annex A pgs 5 & 6) that the Environment Agency was not one of the original consultees that contributed to the scoping document.

8. At what date did the EA Wales become one of the Statutory Consultees?

Please let us know:

- 9. What were the criteria for selecting which water supplies to study?**
- 10. Did these studies include an analysis showing where the supplies come from ie spring fed or surface fed?**
- 11. For the spring fed supplies did the consultants establish from where the springs originate?**
- 12. What were the criteria for selecting which water supplies were “at risk”?**
- 13. Identification of the 24 properties “at risk”**
- 14. On what information about the other 50+ supplies did the consultants base its assertion that they would not be at risk from this development?**
- 15. If a household’s private water supply near to the site, that is not on the “at risk” register, deteriorates could RWE explain what actions that household should take**

We also request:

- 16. RWE ensures all private water supplies for properties within a 5km radius of the development site are identified and analysed in a similar way**

The fact that some properties have been identified as at risk would suggest that RWE has sufficient information about all the other supplies to be in a position to positively establish that they are not at risk. If this is the case:

17. Please explain why RWE will not indemnify all those on private water supplies against loss as presumably there will be no risk to RWE in doing so?

Noise

This is a very emotive issue for those who will have to live near the turbines. Complying with ETSU-R-97 does not mean that local people will not be adversely affected by the noise generated. Residents here enjoy quietness for long periods of time and is one of their cherished amenities which the turbines will abruptly take away forever.

CHA considers that there are elements about noise from this development that need more research:

Basically wind turbines and forests are not a good mix. The air over the trees becomes turbulent which affects the air hitting the turbine blades which makes them less efficient and increases the noise generated. In contrast the noise-source data used in the ES is based on turbines being tested on a flat plane with no obstructions.

18. We request that new noise-source data is measured, taken from turbines placed in a comparable surrounding to that of the Clocaenog Forest and that the desktop studies are rerun using this new data.

There is also concern about the inaccuracy of background noise measurements. Eg. Plas Nantglyn has complained about the noise from a stream that has been included in the data for its background noise even though there is no stream near the property and Hafotty Newydd background noise levels have been used for Ty Uchaf and Isgaerwen even though the terrain of these properties (high up and out of the forest) bears no resemblance to that of Hafotty Newydd which is low down and surrounded by forest. If the source data is wrong everything that follows will also be wrong. What confidence can we have that the conclusions made by your consultant are accurate?

19. With the intended large scale of this project, we request that extra background noise measurements are taken for all properties that are listed as part of your noise study and that the desktop studies are re-run using the more accurate base data.

The turbines and towers proposed for this development belong to a new generation. They are substantially higher with a greater windswept area than existing turbines. The experience of noise generated from existing sites need to be re-examined and existing data amended to take into account all the implications of increased scale. Eg.

- The wind at 150m from the ground turning the blades could be quite

strong whilst at ground level the air could be quite still. This would mean that significant noise could be generated by the turbines whilst the background noise at ground level could be very low.

- the height of the turbines means that its noise will be projected across valleys and ridges directly to receptor dwellings without barriers to muffle the sound
- When the air is turbulent, the large blades are likely to generate more noise than smaller turbines.

20. Please explain what special calculations for noise generation and distribution have been taken into account to accommodate the implications of the increased scale of the turbines.

Landscape and Visual Effect

The first question about a new development for many people will be “what does it look like?”. After 2 years of study your consultants have produced a series of photo montages, the majority of which have been photographed in conditions of low cloud and low light levels. When the proposed turbines have been superimposed on photos like this they become indistinct and in some cases almost invisible. The view from Moel Famau sums this up.

When one of our residents raised this issue at one of your exhibitions the explanation given by RWE was that the photographer had revisited the site several times and this photograph recorded the prevailing condition. This explanation is derisory. If this approach has been applied to the other photomontages it would explain why the overall result is such a misrepresentation.

Those of us who see turbines every day will agree that they do change in colour and emphasis to the background with the weather conditions and direction of the sun but they are still very visible.

Your photomontages do not give an accurate impression of what this development will look like.

We note that view points have not been included for all the surrounding villages. In particular there are none from Nantglyn. This is serious omission.

In figure 5.21.7 Viewpoint 4 - in Volume 7 there are no turbines shown for Derwydd Bach even though they have been depicted in the wire frame on the previous page. As this is a viewpoint from the outskirts of Llanfihangel it is a serious omission

CHA requests:

- 21. All the montages are revisited to add in more realistic impressions of what the turbines will look like under various weather conditions.**
- 22. Additional viewpoints are added particularly one from Nantglyn**
- 23. The photo montages are checked (in particular viewpoint 4) to ensure**

that all existing and approved turbines have been included

The ES states that *“the Clocaenog Forest Wind Farm provides an opportunity to visually link separate scattered existing and consented wind farms across the TAN8 Strategic Search Area of Clocaenog Forest”*

- 24. Please justify this statement and explain how more turbines (which the ES admits will cause a major impact on the landscape and visual amenity) will improve the visual effect of the existing landscape and thus be better for the Hiraethog Area.**

Wildlife & the Effect of Felling

This response to the ES from CHA does not include a detailed critique of the wildlife environmental assessment nor that of large scale felling and its effect on the integrity of the forest. Time has not allowed it and therefore CHA will make its response directly to the IPC if and when an application is accepted from RWE. CHA notes however that several of the responses to you from individuals have raised important questions on RWE Consultants' methodology and conclusions.

Red Squirrels

With reference to Red Squirrels we note that your consultants are pessimistic about the future of Red Squirrels in the Clocaenog Forest. If they are having difficulty in existing in conditions of tranquility we see little hope of the Red Squirrel surviving in the new landscape of turbines, roads, and extensive felled areas. Whilst the consultant's analysis may be correct it is also significant that they are being paid to assist you in being able to make an application that, if successful, will alter the habitat that the Red Squirrels are currently occupying.

On 8th February 2010 the then WAG Minister Jane Davidson launched a campaign to protect the Red Squirrel in Wales. To quote *“in recognition of the importance of these three populations, we have agreed that Anglesey, Clocaenog [Forest] and mid Wales site [Tywl Valley] should be focal sites for red squirrels and that urgent strategic action is needed in these areas”*.

- 25. Please explain how, your development in the long term, and your admitted damage to the Red Squirrel population in the short-term, complies with this WAG policy.**

Effect on Property

We note that the ES does not make any reference to the effect of the turbines on property values and the ability to sell.

Our evidence suggests RWE's declaration to develop the Clocaenog Forest over two years ago has already made it almost impossible to sell properties near to the site. Potential buyers know how large the scheme is and that it will have a significant impact on the whole area. No one knows if and when the

development might be completed, but it seems likely that up until that point is reached the area will continue to suffer from “planning blight”. The psychological effects on those that stay could be bad and if you need to move, the knowledge that this will not be possible without selling you house at an enormous discount is unfair.

This question was raised at one of the Community Liaison Meetings. The answer given by RWE was *“studies have shown that there is no permanent reduction in house values from the construction of wind turbines nearby.”*

CHA is not aware of any recent studies on this subject involving turbines of this scale and in such large numbers

RWE may be aware of a case where the Court reduced the value of the property in question by a substantial amount due to the effects of turbines which were not declared when the owner purchased it.

26. Please include in the ES an analysis on the effect of your development on the value of property and the ability to sell, supported by valid research into the subject.

Tourism

The ES quotes the Wales average for income from tourism at 8.8% and within the Broad Impact Area for this development 13.7%. Yet there are less than 2 pages of analysis in the ES (out of 2-3,000 pgs) on the effect of the turbines on this vital income stream. The technical summary concludes: *“Results from numerous surveys demonstrate that the effect of wind farms on tourism is negligible at worst”*

Of the 5 surveys quoted; the two Scottish surveys are discredited as biased because of the sample chosen, one was commissioned by the wind energy industry, the Green peace survey was nothing to do with tourism, which leaves the Welsh Tourist Board Study of 2003 from which RWE consultants have taken just 5 statistics on which to base a conclusion that turbines have a negligible effect. In fact the extensive Welsh Tourist Board study was the first to conclude that turbines had a negative effect on tourism.

Beyond dispute, none of the studies relate to the new 150m high 3MW turbines when constructed in such large numbers as is proposed for the Clocaenog Forest.

People from the Hiraethog area experienced in tourism say that visitors come here for the peace and quiet, the tranquility and the stunning landscape.

27. We request that a serious study, appropriate to this important subject is carried out and included in the ES.

Safety

Safety during operation of the site does not seem to have been dealt with in any detail in ES. There is no mention of fire and very little discussion and questionable mitigation proposals for Ice throw.

Last year there was a serious fire in one of the Tir Mostyn Turbines. The fire brigade was unable to fight it because of the height. Burning debris was flung for several hundred metres from the burning blades onto the road and into the forest. By chance it happened at a time of year when the forest was wet. If it had occurred during the summer the damage may have been a lot more serious.

The section on ice throw in the ES raises more questions than provides answers particularly if the turbine specification prevents ice detectors from being installed. Halting operations during ice accretion is one option proposed. Another is visual inspection of the blade. The last two years we have experienced months of ice secretion weather.

28. Would RWE close them down for that length of period?

29. How would visual inspection over this length of period be practical particularly with the short daylight hours?

Warning signs is another mitigation option proposed in the ES.

29. Where would they be placed, how would the public know when there was a danger, would there be fenced off areas?

CHA is surprised that the Health & Safety Executive has not been one of RWE's statutory consultees in the development of this ES. It now requests:

30. RWE incorporated a new section on "safety" within the ES and that the HSE should be consulted on its scoping and its critical analysis of RWE's proposals.

The Psychological Effect of the Change to People's Living Environment.

The ES is quite open about the scale of change that will happen under the separate subjects that were studied. They have not been pieced together and analysed to show the cumulative effect on the people who live here.

- There will be major impact on visual amenity for many people
- There will be significant landscape change
- There will be red flickering lights all around at night where as at present there is absolute darkness or star filled skies
- The forest will become industrialised
- Turbine noise will be introduced day and night. A change which will be very significant against the current very low background noise level
- For two years the whole forest will become a building site with traffic delays and significant noise
- There will be a worry for many that their water supplies for drinking and livestock could be affected
- Their house values and ability to sell will be affected

And yet there is no offer of direct compensation for any of these amenity losses

It all adds up to a life-changing situation for many and yet there is not one

reference in the ES devoted to it.

31. CHA request a full study on the psychological effects of the development on the individuals living within and surrounding the development area to be commissioned for inclusion in the ES.

From this letter and the many individual letters I know you have received, you will be aware of some issues that the ES has raised and how important these are for the residents and communities in and around the Clocaenog Forest and those who use the forest as a rightful amenity. The points that we have raised for action or explanation have been numbered for clarity and to assist both RWE and CHA keep track of the responses.

CHA hopes that this consultation response will be helpful but wishes to stress that it is not a detailed analysis of the ES which will only be possible with more time. We would welcome a view of the final EIA when it is available.

Yours sincerely

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Hon. Secretary Cynghrair Hiraethog Alliance

CC

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