

## GALAR's evidence to P-03-273 Transportation of wind turbines in mid Wales.

### The Petition

**We call upon the National Assembly for Wales to urge the Welsh Government to issue guidance to Local Planning Authorities to ensure that communities are properly consulted on wind farm developments, that impact on road infrastructure is properly assessed and that the broader effects of traffic disruption on sectors such as tourism are properly considered before any development is approved to take place. We believe the only way this can be properly concluded is by way of a public inquiry.**

GALAR would support the above petition. While the Petition title sites mid Wales specifically, the petition itself refers to Local Planning Authorities and communities, which would be common to all areas subject to being on route to the SSA as determined by TAN 8.

We would support the call for a public inquiry, and ask that the inquiry investigates the following areas:-

- That a Traffic Impact Assessment<sup>1</sup> be made on all SSA's as determined in TAN 8, and on any further areas designated to meet WAG onshore windfarm plate capacity requirements. This TIA should determine the suitability of routes, and whether those routes can be used without adversely affecting other users and residents along the routes.
- If the selected routes are found to be inadequate then upgrading, or alternative traffic infrastructure should be in place prior to developments commencing. Unclassified roads and classified roads which form part of communities would have to be assessed as to impact before, during, and after the developments have taken place, to ensure change is minimal and the tourism and recreational features of routes are maintained.
- The inquiry should investigate methods of traffic assessment and movement. Simple traffic counting statistics employed at the moment are of little use. Wind Farm construction imposes a special encumbrance on rural road networks. Even developments below 50 MW create thousands of vehicle trips. These vehicles are predominantly slow moving heavy goods vehicles occupying road networks at peak traffic times. All the SSA's have been designated in rural areas, least suited to handle industrial plant traffic.
- The SSA's have also sought to concentrate developments in confined areas of the country side. There is no mechanism in place to coordinate traffic between developments on the SSA. WAG looking to have all SSA developments completed by 2017, but there is no plan to control traffic by sequential installation.
- The inquiry should also investigate route values in terms of emergency vehicle operation<sup>2</sup>, animal movements, and the potential tourist growth over the six year period.
- Rural unclassified roads are a major tourist attraction, and recreational amenity in West and mid Wales, providing walkers, cyclists, equestrian and light access vehicles approach to the village communities. The very areas which Local Planning Authorities, through UDP's and LDP's, recognise as primary growth potential for a stronger rural economy<sup>3</sup>. The inquiry should be aware that many of these roads have historical associations with Wales over the

<sup>1</sup> The TIA is at present made after approval by the Local Planning Authority under 50MW and by the IPC above 50MW  
[See online footnote 1](#)

<sup>2</sup> In SSA G the unclassified road designated by all developers, is the most direct and fastest access to Carmarthenshire hospital services for three rural communities. [See online footnote 2](#)

<sup>3</sup> This is also the ambition of the DEFRA supported National Ecosystems Assessment. [See NEA Report \(Footnote 3\)](#)

last two centuries, as drovers trails, cattle and local market associations. Many have only been paved in living memory. Their preservation is of paramount importance, both as amenity attraction and a source of rich biodiversity, (especially in heavily farmed and over forested areas).

- The inquiry should take evidence from Local Planning Authorities, and academia in respect of ecology and civil engineering. Construction methods, as proposed in the developers EIA's are not good enough to protect our biodiversity, ecology, or the future of our rural economies which lies in tourism. SSA areas are set to become ad hoc industrial development sites. Construction methods employed should be of the highest environmental standards and meet best practise to conserve biodiversity, and where possible reduce traffic impact.
- Traffic impact on tourism must be a major factor, in consideration of a application. Defra, the NEA, UDP, and the LDP's recognise tourism as the primary source of development of rural economy in Wales and the Welsh Assembly Government should enact legislation that protects this economic activity from development which has little or no local benefit.

We look forward to the petitions committee putting these points forward, and recommending to the Welsh Assembly Government a Public Inquiry which will provide the basis for legislation in this area.

GALAR

15 September 2011