



Submitted via PEDW.Infrastructure@gov.wales
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Dear Sirs

Wind Turbines at Rhoscrowther

We are the owners of St Decuman's church, Rhoscrowther. The setting this ancient foundations will be adversely affected by these new proposals from Rhoscrowther Wind Farm (Planning Application Ref.: 21/0695/NS)

The grade I listed church of St Decuman is a medieval parish church. "It is thought to be the location of a bishop house mentioned as 'Llan Degeman' in a 9th-century text of the Welsh Laws. It has been suggested that the churchyard lies within an outer enclosure which is subdivided by springs. A building known as St Deguman's Chapel adjoins the south side of the nave and is thought to represent a chapel-y-bedd (a late medieval chapel erected over a founder's grave)."¹ The extant structure is likely to have its origins in the 13th century, and was altered and extended in the 14th century.

The church was damaged as a result of an explosion at the Valero refinery in 1994. The damage to the church was mostly repaired, but the village was evacuated, the settlement cleared. The church was eventually closed for worship in 2004 and passed to care of our organisation, Friends of Friendless Churches, in 2005.

The church stands within a walled churchyard, on rising land to the north of a stream which flows to Angle Bay to the west. The churchyard has a gate at its (north) end, and a second gate at its south-eastern corner. Next to the south-eastern gate stands a small C19 schoolhouse, which is listed in its own right (grade II). Also in the churchyard, between the church and the schoolhouse, stands a grade II listed medieval cross shaft and base.

¹ Royal Commission for Ancient and Historic Monuments Wales; <https://coflein.gov.uk/en/site/308950/>

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*Friends of Friendless Churches is a company limited by guarantee. Charity no.: 1113097; Company no.: 1119137;
Registered in England and Wales.*

These structures are the only surviving elements of this historic settlement. As the appeal decision in 2018, noted “There is a clear visual and functional relationship between these elements. The church and its companion listed buildings form an intimate group which has something of an enclosed and isolated feel resulting from its valley location, the clearance of much of the village and mature trees which limit views outwards from the churchyard. However, from within the churchyard there are partial views eastwards towards the upper parts of the enclosing valley, where the turbines would be located.”

Despite the revised proposals, this would still be the case. (See file reference: 42701-WOOD-XX-XX-FG-L-0005_S0 Figure 8.6d of the documents submitted with this application.)

Although the church is no longer used for regular worship because of the explosion at the oil refinery, it is open 365 days a year and is cared for by several people from surrounding areas, including families displaced by the explosion and clearance of 1994. The churchyard remains open for burials, and funerals are still held at the church.

As well, as local people, the church draws hundreds of visitors each year, and is an active participant in Cadw’s, Drysau Argored each September. Indeed, it was Cadw – and the Church in Wales – who championed and funded the entrusting of this historic church to our care. While it is no longer needed for regular worship because of unfortunate historic events, the church is still of immense architectural and historical importance. “It remains a significant element of the historical and cultural fabric of the area, as attested to by evidence of its on-going occasional use, visitor book entries and its inclusion on the Priors and Pilgrims Trail.”²

Although the refinery to the north is vast it cannot be seen from church or churchyard, due to the sloping, wooded landscape. Its bulk or operations do not impact on the setting, seclusion, enjoyment or peace of the church and churchyard in any way.

The same cannot be said the proposals submitted by Rhoscrowther Wind Farms. The nearest turbine will be located 709m from the church. As the submitted simulated images portray, the blades of one turbine will always be visible. The simulated images also show the trees in full leaf – when the trees shed their leaves, it is likely that all three turbines will be plainly visible from the church and churchyard.

It is noted that the appeal decision of 2016 that, “there may, however, be limited opportunity for a single or a small cluster of medium or large (under 100m to blade tip) scale turbines on land close to existing oil refinery chimneys to provide a new point of focus as long as they are sited sensitively following the guidance below” (detailed guidance follows). Annex 2 also notes that where the assessments make reference to “small clusters” of wind turbines, these comprise groups of 2-3 turbines”.

The applicant has half listened to this advice. The number of turbines is reduced from 5 to 3 to constitute a “small cluster”, but the blade tip is in excess of 100m, now being submitted at 135m. In File reference: 42701-WOOD-XX-XX-FG-L-0005_S0 Figure 8.6a, the applicant makes

² Appeal Decision: 04 February 2016

comparisons with five other local wind farms. The table clearly shows that the proposed turbines will be 35m longer in blade tip length than any of the other five listed. The hub height and rotor height will also be significantly more substantial than any other turbines locally.

There is no question that these turbines would have detrimental impact, a substantial level of harm, on the setting and enjoyment of this historic church and churchyard.

As a small charity which owns 29 listed churches in Wales – and takes on more every year, we rely on donations from visitors, income from filming, income from event hire to help run our charity and fund the upkeep of these historically important places of worship. The peacefulness and seclusion of the setting is what attracts so many people. The placement of three huge turbines on the doorstep of this church could impact adversely on our income and the ability of our charity to function.

Yours faithfully

A large black rectangular redaction box covering the signature of Rachel Morley.

Rachel Morley
Director