

# **Environment and Sustainability Committee**

## **Inquiry into Energy Policy and Planning in Wales**

EPP 69 – Richard Noyce

14<sup>th</sup> September 2011

I commend the Welsh Assembly for setting up a Committee to inquire into how the current devolution arrangements for energy policy and planning will affect the ability of the Welsh Government to reach the appropriate energy mix for the future.

I am of the opinion that the current arrangements for devolution do not go far enough and that Wales should have much greater control over all such matters as directly affect the country and its people. Energy is clearly, in my view, one such matter. The current and proposed arrangement for major energy production facilities, whereby those facilities up to 50Mw are to be considered by Local Planning Authorities, and above 50Mw by the Infrastructure Planning Commission in London is close to irrelevant, in that the large majority of such facilities are designed to produce more than 50Mw. In effect this is a tactic to disenfranchise local planning arrangements, shifting the decision to a body far away from the sites of proposed facilities, and into a system in which the 'presumption in favour of consent', while not yet enshrined in Planning Law, is already coming into effect.

Contrary to this I consider that all such decisions regarding the development of energy production facilities and power distribution within Wales should, as of right, be considered and determined within Wales, by Welsh authorities, and with full rights of consultation and representation being granted to the communities in which it is proposed that such facilities are to be placed. It is a simple matter of democratic accountability, and of taking the decisions that will affect local communities, often to a high degree, as close to those communities as possible. The Localism Bill, as is likely to be applied in England, and which may or may not apply through similar legislation in Wales, seems to be based firmly on such principles. In any case they are principles of fairness and common

sense. In the case of energy generation proposals there will of course be elements of national (UK) and international (Europe) concern: the bodies responsible for these areas should be able to participate and comment as statutory consultees, but not to overrule Welsh decisions.

Members of the Committee will be aware of the strength of feeling among the communities of Mid Wales and the Marches in response to the emergence of information on just what could be involved with the development of further wind farms within the SSAs established under TAN8, and through the implications of the Mid-Wales Connection Project for the establishment of electricity substations and power lines. The public meetings, and the major demonstration at the Senedd, should be seen as sending a very clear message to all concerned that the people of Mid Wales and the Marches are extremely unhappy about the proposals and indeed about the failure properly to consult regarding the Mid-Wales Connection Project, which was very badly handled by the National Grid and Scottish Power.

If the Welsh Government is to serve the people of Wales, by whom it is elected, and by whom it could in turn be rejected, then it is incumbent on that Government to pay full heed to the views of all shades of opinion, and indeed actively to seek and encourage that range of opinions.

Richard Noyce

**FROM: RICHARD NOYCE**

**TO: THE ENVIRONMENT AND SUSTAINABILITY COMMITTEE, WELSH  
ASSEMBLY, CARDIFF**

14<sup>th</sup> September 2011

In regard to the two petitions that will be considered by the Committee, I would comment as follows:

In reference to TAN 8: I consider that the document is long overdue for revision or replacement. It was written, and subsequently amended, at a time in which the technology of on-shore wind generation was based on technology that has now been superseded. This technology has moved on with many changes, prime of which is the scale of wind turbines, which are now as high as 606ft and may well get larger still. While a generous view in the past might have been that a number of older generation turbines might (*only might*) be considered as acceptable if (and *only* if) they were consistently productive and effective, larger turbines are a different matter entirely. Their size would make them visible over far greater distances, with far deeper impact on the beautiful landscapes of Wales. The access roads, foundations and hard-standings would require to be much more extensive and far more damaging to the local environment, while also increasing flood risk through rain water run-off. The impacts, visual and environmental (including noise) would be considerably more unacceptable. In addition the creation of a 'pylon-scape' would undoubtedly have an adverse effect on tourism – a major revenue earner for Wales, and at the same time would have a seriously negative effect on the values of property in the area. Furthermore the numbers of local jobs produced at any stage in the building, maintenance and operation of the wind farms would be negligible. Beneath all such arguments (and there are many more) against wind turbines and wind farms there is the simple and incontrovertible scientific evidence that wind turbines are grossly inefficient, grossly uneconomic and environmentally destructive machines. They do not produce sufficient energy to warrant their destruction of the natural environment of Wales; they demand (via the Renewable Obligation Certificates and other taxes that are added to electricity

consumers' bills by stealth) huge sums of money from the people of Wales, and generate wealth through subsidies that are for the most part given by the UK government to companies that have no base in Wales, and often no base in the UK either.

In any sound society, such as Wales deserves to be, TAN 8 should be set for immediate review and replacement, after proper consultation with the people of Wales. There needs to be a rational and scientific analysis of prevailing and forthcoming technologies in both new generation conventional and renewable forms of energy generation.

In the meantime all wind farm applications should be subject to a moratorium under which all work on developing and processing applications would be ceased until the people of Wales agreed a new and responsible Technical Advice Note. That is what democracy should provide. That is what I ask the Committee to insist upon.

In reference to the transport of wind turbines in Mid-Wales: I have great concerns on this matter. The evidence that has emerged into the public domain suggests that the numbers of traffic movements, the size of vehicles required, and the time scale over which such movements would be necessary if the full, or even a major part, of the proposals for wind farms stemming from TAN 8, are implemented, would be totally unacceptable for the existing road network and communities through which the traffic movements would be made. The responsibilities for the maintenance of the trunk road network, through the Trunk Roads Agency, and for the county networks, through the local authorities, are currently subject to the same restrictions on public spending as other areas of expenditure, and are all dependent on taxpayers' money.

The Welsh Government, and the local authorities, both have a fiduciary duty of stewardship to the people of Wales, to ensure that the money taken from them in taxes is spent wisely and well. To damage extensively the roads networks, as would be inevitable given the sheer numbers of heavy traffic movements involved, would be grossly irresponsible. That such traffic movements would be required in order to build wind farms that are (as outlined above) technically and

morally unacceptable only adds insult to potential injury, and emphasises the need to revise TAN 8 as a matter of great urgency.

Finally the Welsh Government, Assembly Members and all the staff employed, are public servants. The people of Wales have elected you as politicians, and it is to those people that you are primarily responsible. I trust that you will consider fully and responsibly your duties to the people and landscape of Wales, and not allow yourselves to be swayed by pressure from Westminster, Europe, or multinational companies.

Richard Noyce