

Environment and Sustainability Committee

Inquiry into Energy Policy and Planning in Wales

EPP 107 – Barry Smith

21 September 2011

Dafydd Elis-Thomas AC / AM Chair
Environment and Sustainability Committee
Cardiff Bay
Cardiff
CF99 1NA

Dear Sir

Re. Inquiry into energy policy and planning in Wales

With regard to the two petitions under consideration in your inquiry into energy policy and planning in Wales:-

P-03-273 *Transport of wind turbines in Mid Wales* - and
P-04-324 *Say No to Tan 8 - Windfarms & High Voltage Power Lines Spoiling our Communities*

I am writing to urge that you should look seriously at the consequences that will arise from the transportation of large and frequent industrial loads through Mid Wales, and instigate an immediate review of TAN 8 if you are to meet the Welsh Assembly Governments objectives laid out in Wales' Energy Policy Statement "A Low Carbon Revolution" and the Sustainable Development Charter.

I find many of the statements in these documents totally at odds with the effect that the developments of onshore wind farms, as favoured by TAN 8, will have across Wales. Studies are now emerging from many eminent bodies such as the Renewable Energy Foundation. (www.ref.org.uk/uk-renewable-energy-data) which show that :-

TAN 8 will not "**maximise energy savings and energy efficiency**" or "**meet energy needs from low carbon secure indigenous means**" as wind is not secure, is too intermittent and too costly, in both environmental and economic terms.

TAN 8 will not ensure that the transition to low carbon energy "**maximises economic renewal opportunities**" as the construction of onshore wind farms will cost many jobs in the tourism sector and these will not be offset by the same numbers of workers in the construction and renewable industries. Rather than helping to "**tackle deprivation and improve quality of life**" you will instead create deprivation and decrease quality of life as support for the developments in the form of ROC subsidies will result in an increased energy bills for everyone. This will hold back industry through increased costs and particularly affect those least able to meet the increase bills pushing many more families into fuel poverty.

In order to "**meet almost all of our energy needs**" it is futile to proceed with the emphasis on onshore wind as studies show that this is not going to meet the targets set. If these targets are to be met we must start "**supporting innovation**" by immediately diverting subsidies to the funding of technologies that will achieve this objective.

With regard to the transportation issue, I fail to see how the massive amount of construction traffic which will be generated by onshore wind farm development across Mid Wales will lend itself to a situation

where the inhabitants of Wales can “**enjoy communities which are safe, sustainable and attractive, and where people enjoy good health, by having a much stronger connection with our local environment, economies and each other.**” Neither do I see how the devastating effect this will have on the Tourism industry will help “**build a resilient and sustainable economy**”. What is left of the tourism industry, once the construction period is complete, will then undoubtedly suffer from the decimation of the visually stunning landscape and the loss of visual amenity which will result from siting hundreds, if not thousands, of turbines out of all scale to the landscape. I fail to see how this will help “**Local economies and suppliers grow and prosper**” as the labour and resources for developing these industrial sites will more than likely come from outside the communities that they are affecting.

Many of these issues would have been addressed had TAN 8 followed the Strategic Environmental Assessment Directive 2001/42/EC dated 27 June 2001. This directive required all countries to put in place legislation to enforce the directive by 21 July 2004 and this resulted in The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 [2004 No. 1656(w.170)]

This legislation requires that for all plans and programmes commenced on or after 21 July 2004 “the responsible authority must carry out, or secure the carrying out of, an environmental assessment, in accordance with Part 3 of these Regulations, during the preparation of that plan or programme and before its adoption or submission to the legislative procedure”

It goes on to provide that for all plans and programmes where first formal preparatory act was on or before 21 July 2004:-

6.—(1) Subject to paragraph (2) and regulation 7, where—(a) a plan or programme of which the first formal preparatory act occurs on or before 21 July 2004 has not been adopted or submitted to the legislative procedure for adoption before 22 July 2006; and (b) the plan or programme is such that, had the first act in its preparation occurred after 21 July 2004, the plan or programme would have required an environmental assessment by virtue of regulation 5(1); or (c) the responsible authority is of the opinion that, if a determination under regulation 9(1) in respect of the plan or programme had been made after 21 July 2004, it would have determined that the plan or programme was likely to have significant environmental effects, the responsible authority must carry out, or secure the carrying out of, an environmental assessment, in accordance with Part 3, during the preparation of that plan or programme and before its adoption or submission to the legislative procedure for adoption. (2) Nothing in paragraph (1) requires the environmental assessment of a particular plan or programme if the responsible authority—(a) decides that such assessment is not feasible; and (b) informs the public of its decision.

As TAN 8 was in public consultation until November 2004, I am pretty sure that:-

- a) An assessment would have been feasible, and
- b) No decision not to prepare one was published and no mention of the omission was made in the TAN

I feel this as a very important issue and one that should be addressed by this committee. Whether or not the TAN should or should not have included an environmental assessment, it is certainly the case that it would now benefit from one being prepared. Such an assessment could also consider the overall economic impact of the policy document, something which has never been considered. There have been many innovations and technological advances which were not envisaged when TAN 8 was produced. Turbines are now much larger than those which were considered when the policy was formed and a review which takes into account these changes can only be beneficial and ensure that mistakes are recognised before their consequences reach catastrophic levels.

I urge you to press for an immediate review of TAN 8 and a moratorium on developments within the SSAs whilst this review takes place.

Yours Faithfully

Barry Smith FCCA