

## NORTH WALES ASSOCIATION OF TOWN AND LARGER COMMUNITY COUNCILS

Robert A Robinson FRICS AILCM Secretary

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16<sup>th</sup> August 2011

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

Dear Sir

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

This letter is written in response to the Welsh Assembly Consultation. There are over 30 larger Town and Community Councils who are members of this Association which have considered this subject.

The Association is appreciative of the opportunity to respond to your letter of 2<sup>nd</sup> August 2011 on the above subject. The Association has for over 3 years now been concerned about the effects of the proposals for TAN8 upon Mid Wales. However, the Association wishes to be helpful in finding a resolution that meets the concerns of the population as well as meeting the requirements of the Welsh Assembly Policy. The Association wishes to first express its willingness to help in any way it can in this regard.

The Association responds below in the same order in which the subjects are raised in your letter:

#### **Implications for Wales**

*What are the implications for Wales if responsibility for consenting major onshore and offshore energy infrastructure projects remains a matter that is reserved for the Westminster Government?*

The implications for Wales, in particular Mid Wales, are not good if Westminster is involved as well as the Welsh Assembly and then County Councils. There should be a single body on such matters to ensure co-ordination and confidence to the electorate that all matters are considered together. This Association has been asking for this for over a year.

In this way a better scheme for the provision of the Welsh Assembly targets can be formulated.

### **Affect on Welsh Assembly Aspirations**

*How does this affect achievement of the Welsh Government's aspirations for various forms of renewable and low carbon energy as set out in the Energy Policy Statement?*

The objections and protests against the power lines with regard to the affects on the landscape of Mid Wales could in turn affect the achievement of targets and development as proposed in the Energy Policy Statement.

The TAN8 proposals need to be reviewed, and quickly, so that targets set by the Welsh Assembly are not held up unnecessarily and clarity is given to the residents of Mid and North Wales.

### **Welsh Assembly Targets for reduction in Greenhouse Gases**

*How does this affect the delivery of the Welsh Government's target for a 3% reduction in Green House emissions per annum from 2011?*

The Association in principle supports the targets for reduction in greenhouse gases. However the target of 2011 is unrealistic as the time has almost passed.

The target will only be met with public support and at this time the Association suggests such support is not evident, particularly in Mid Wales.

### **Welsh Assembly planning policy**

*What will be the impact if consenting decisions on major infrastructure projects and associated development are not taken in accordance with Welsh Planning Policy?*

Welsh Assembly planning policy with regard to TAN8 should be followed after it has been reviewed. One method of doing this, is a formal liaison with Town and Community councils present to take part in seeking a solution, not just being told what is to happen. If a conference is not acceptable, then it would be right to hold a public inquiry. The Association feels that a conference is best but a public inquiry is next. To review TAN8 without extensive Community Council involvement, the Association strongly feels, is not an option. This is in view of the level of opposition and the lack of confidence in the more senior tiers of government. The impact with regard to delays is almost certain with regard to the delivery of a reduction in Green House Gasses if the Town and Communities in North and Mid Wales are ignored.

### **Impact on local communities (petitions)**

*Alongside these questions, the Committee will also consider the two petitions about Welsh Assembly Planning Guidance as it relates to onshore wind energy and impact on local communities and infrastructure.*

The Association is concerned about the effects of TAN8 upon Mid Wales and although in support of renewable energy there is a price at which this is unacceptable. The Association feels the current proposals go no where near to an acceptable form of renewable energy programme for Montgomeryshire and other areas in the Northern part of Wales.

Please see the details notes below under 'Review of TAN8'.

The Association has delivered petitions relating the effects of TAN8 and its transport effects in particular over the past 2 years. This includes petitions to Parliament and the Welsh Assembly.

In addition it is noted that the Committee will want to consider the following as part of its terms of reference. The Association comments on each as follows:

**Role of consenting agencies**

*The role of different consenting agencies, how they inter-relate and how the current system could be improved, both with and without further devolution (Infrastructure Planning Commission, Planning Inspectorate, Local Planning Authorities, National Parks, Welsh Government, Marine Management Organisations, Environment Agency).*

The role of the Welsh Assembly Government is paramount in the decision making process and should be the body which pulls together all the authorities to reach an acceptable solution. We refer to the notes below in that the Association feels there should be just one body to oversee the whole process.

The Association suggests that it would be a good way forward if the Welsh Assembly co-ordinated a conference (as mentioned above) where Town and Community Councils could meet and try to agree a way forward with the Welsh Assembly and agencies involved. It sounds difficult but could be achieved. The Communities would then feel more involved and be more satisfied that they have been heard. The Community Councils are the right persons to be involved as they are the elected representatives on the ground.

The Association would be willing to help if such an idea was taken forward with particular regard to TAN8.

**Relationship between Central Government and Welsh National Policy and if a review of TAN 8 is required**

*The relationship between the UK Government's Energy National Policy Statements and Welsh National and Local Planning Policies (including Planning Policy Wales, Technical Advice Note 8 and Local Development Plans) and whether or not these policies can achieve the Welsh Government's aspirations including whether or not a formal review of TAN8 is now required.*

The Association takes the view that it would be better if one single body took the decisions regarding all aspects of the TAN8 policy, in our view this should be the Welsh Assembly without any influence from Westminster. In this way a co-ordinated approach can be taken and those who are concerned can be more satisfied that all aspects are considered together.

There have been many public meetings and demonstrations already which show the level of objection to the current policy of TAN8 and its effects. Indeed a full door to door survey was carried out by Welshpool Town Council which showed 80% objecting to the proposals (over 2,000 responses from just one town). Also Llanfechain (not directly affected) did a street survey and gained a similar result.

The Association is aware that the Welsh Assembly carried out a partial review of TAN8 last July and August 2010 and the Association did respond to that.

The Association is also aware that the Welsh Assembly has voted recently not to review TAN8. However the First Minister has on several occasions shown recognition of the problems created by TAN8 in Mid Wales.

A review of TAN8 in itself is not enough; the power lines in Mid Wales are at capacity now. With only just a few more wind farms the problem of how the energy is taken from the West to the National Grid is evident.

The provision of power lines (400kv) is not an acceptable way of taking power through picturesque countryside which is the main basis of the tourist economy upon which many Mid Wales towns are based unless its effects are mitigated by underground cabling.

The Association suggests that a review is necessary with the aim of reducing the impact by restricting the power lines needed to 132kv which are much smaller and easier to put underground in sensitive places.

### **Contribution of different renewable energy sources**

*The potential contributions and likelihood that different types of renewable and low carbon energy (offshore wind, tidal, onshore wind, hydro power, nuclear, bio-energy/waste, micro generation, community energy projects) will be capable of delivering the Welsh Assembly aspirations for energy generation as set out in 'A Low Carbon Revolution – Energy Policy Statement and the UK Renewable Energy Roadmap.*

The contribution of all sorts of energy production should be taken forward. However, the Association does not feel qualified to comment beyond this statement.

### **Potential contribution to reduction in greenhouse gases**

*The potential contribution of these different types of renewable energy to meeting the Welsh Government's annual target for Green House Gas emission reduction.*

The contribution of different types of energy and there ability to help achieve the Welsh Assembly annual target is outside the scope of the Associations knowledge.

### **Other forms of energy production**

*The potential role of other forms of energy production in Wales e.g. existing fossil fuel energy generation, proposed nuclear generation and newer technologies such as coal-bed methane and shale gas.*

The Association does not feel qualified to comment on these aspects of the Committee remit. However, there are 3 major dams in Mid Wales that could be considered for hydro energy.

### **Transport issues**

*The transport issues relating to wind turbines and other forms of renewable energy including their impact on roads, traffic and tourism.*

The transport issues are immense with the Mid and parts of Mid Wales road network hardly able to take larger normal Lorries let alone the ones proposed.

The alterations and the traffic congestion that will occur, when ever they come through Mid Wales, is enough to affect substantially the tourist industry upon which much of the Mid Wales economy is based.

The Association is aware of a meeting held with Wayne David (Minister of Energy) of the last Parliament on this subject. The Minister was astounded at the level of transport proposed.

Following that Local Councils in Montgomeryshire met with Cheryl Gillan Minister for Wales at Westminster and she travelled the routes of the proposed transport and was again amazed at the poor roads which are planned to be used.

A letter to the Welsh Assembly accompanied with a petition relating to wind farm transport objecting to the levels proposed.

Transport estimated figures based upon 630 wind turbines are shown at appendix A (based upon current planning application numbers). These figures are based upon those recognised by the wind farm companies and which have been used by them.

I hope the above is helpful and constructive.

The Association confirms that it is more than willing to attend a Committee to give oral evidence and indeed would like to request to be able to do so.

The Association has adopted a formal policy with regard to this subject which is as follows (approved by the July 2011 meeting of the Association).

- a) *To present a petition to Parliament seeking a review of the pylon lines proposed by the National Grid to support TAN8 objecting to the scale of TAN8.*
- b) *To present a petition to all the AM's in the area of the Association seeking their support for a review of the TAN8 proposals with particular regard to the effects (Pylons, electricity hubs and transport) on the basis that since their last discussion on the subject the Welshpool door to door survey has been completed. To object to TAN8.*
- c) *To send a letter to all the MP's in the Associations area seeking their support to the objections made by Glyn Davies MP (Montgomeryshire) with regard to the effects of TAN8 on Mid and North Wales.*
- d) *To send a letter to Powys County Council supporting their request to the Welsh Assembly seeking a review of TAN8.*
- e) *To issue a press statement confirming the Associations objection to the effects of TAN8.*

Finally the Association wishes to point out that the content of this letter in no way alters the resolve the group to oppose any unacceptable developments connect with TAN8.

fully

Bertola

Robert Robinson FRICS AILCM  
Secretary



## TRANSPORT ESTIMATES FOR WIND FARM CONSTRUCTION APPENDIX A

### Introduction

The assessment below is based upon 500 new wind turbines and the effective transport generated from them. It should be noted that in the Royal Institution of Chartered Surveyors Journal on the subject of wind farm transport the following statement was made by experts: 'In every case to date wind farm transport has been underestimated'.

### Source of material

Transport companies and wind farm companies from their own figures.

ITEM	If constructed over OVER 3 YEARS	If constructed over OVER 4 YEARS	If constructed over OVER 5 YEARS
WIND TURBINES	630	630	630
VEHICLE MOVEMENTS	630,000	630,000	630,000
ABNORMAL LOADS	6,300	6,300	6,300
CONVOYS OF	3	3	3
CONVOY TOTAL	2,100	1,575	1,260
CONVOY PER YEAR	700	394	251
LARGE CONVOYS PER WEEK VIA WELSHPOOL	4	2	1
LARGE CONVOYS PER WEEK VIA NEWTOWN	8	5	3
LARGE CONVOYS PER WEEK VIA OTHER AREAS	2	1	1
EXTRA GENERAL TRAFFIC PER WEEK IN AREA	4,038	3,038	2,423

The time taken for a convoy of 3 Lorries (as per trials carried out) would be in the region of 30 minutes through the town centre of Welshpool.

Robert A Robinson FRICS AILCM

Dated 11.8.2011