

MONTGOMERYSHIRE LOCAL COUNCIL FORUM

Robert A Robinson FRICS AILCM Secretary

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16th September 2011

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

Dear Sir

Consultation on Energy Policy and Planning in Wales

Good morning, I hope this letter finds you well.

This letter is written in response to the Welsh Assembly Consultation. The Town and Community Councils at the meeting which agreed this response were Welshpool, Newtown, Llanfair Caereinion, Llanfechain and Kerry. Other members who have supported the policy of the Forum are from Llandisilio, Llanfyllin and Llandrino Councils.

The Forum wishes to point out that there is a substantial majority of objectors to the wind farm proposals in Mid Wales from the communities represented by the Forum.

The Forum is appreciative of the opportunity to respond to your letter of 2nd August 2011 on the above subject. The Forum has for over 3 years now been concerned about the effects of the proposals for TAN8 upon Mid Wales. However, the Forum 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 Forum wishes to first express its willingness to help in any way it can in this regard.

The Forum 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?

Cont..

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 Forum has been asking for this for over 3 years.

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

Those who stand to gain from any part of the wind farm developments should be required to take no part in any of the decision making with regard to them.

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 effects 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 is not held up unnecessarily and clarity is given to the residents of Mid 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 Forum 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 Forum 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 Forum feels that a conference is best but a public inquiry is next. To review TAN8 without extensive Community Council involvement, the Forum 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 Mid Wales are ignored.

Cont...

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 Forum 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 price is not just monetary but also environmental.

The Forum feels the current proposals go nowhere near to an acceptable form of renewable energy programme for Montgomeryshire.

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

A copy of the Forums petitions are attached. (see appendix A)

The Forum has delivered petitions relating the effects of TAN8 and its transport effects in particular over the past 3 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 Forum 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 Organisation, 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. I refer to the notes below in that the Forum feels there should be just one body to oversee the whole process.

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

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

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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.

An integrated energy policy should embrace various types of renewable and low carbon energy generation forming part of any installed generation capacity. The Forum warns of putting too much reliance upon a single form of energy technology. Ie Wind Farms.

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 Forums 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 Forum 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 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.

Indeed our Planning and Development Chair (Cllr John Meredith) accompanied the secretary to meet Wayne David (Minister of Energy) of the last Parliament on this subject. The Minister was astounded at the level of transport proposed.

Following that Cheryl Gillan Minister for Wales at Westminster met with local Community Councils (arranged by this Forum) and travelled the routes of the proposed transport and was again amazed at the poor roads which are planned to be used.

A copy of our letter to the Welsh Assembly accompanied with a petition relating to wind farm transport is attached at appendix B. Transport estimated figures based upon 630 wind turbines are shown at appendix C (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.

The carbon footprint reduction gained by Wind Farms is substantially reduced by the transport and infrastructure effects and this should be taken into account.

I hope the above is helpful and constructive.

The Forum 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.

Finally the Forum 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.

The Policy of the Forum with regard to this subject is noted in our minutes of a meeting held on 16th September as follows:

1. The Forum supports the views of the Local Councils in Montgomeryshire in their request for a review of TAN8.
2. The Forum objects to the following:
 - i. The level of wind farm development proposed for Mid Wales.
 - ii. The effects of the hub and 400kv pylon lines proposed.
 - iii. The transport effects with regard to the construction of wind farms and associated works.
3. The Forum will continue to work with Local Councils to find an acceptable solution and seek to be involved in the process of gaining such a solution.

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

Thank you for your time.

Yours faithfully

Rob [REDACTED] son FRICS AILCM
Sec [REDACTED]

PETITION TO THE HOUSES OF PARLIAMENT

To the honourable the Commons of the United Kingdom of Great Britain and Ireland in Parliament assembled.

The humble petition of the Montgomeryshire Local Council Forum sheweth that the communities of WELSHPOOL,

in Mid Wales are deeply concerned about the effect of the Wind Farms, Electricity Hub, Pylon Lines and transportation for in Mid Wales which is proposed over a sustained period.

Wherefore your petitioner prays that your Honourable House will call for a public inquiry in this matter to ensure that all is properly explored together before any Wind Farm, Hub or Pylon Line development is approved or allowed to take place.

Any your petitioner, as in duty bound, will ever pray, that the House considers our petition favourably to ensure that full, proper and open consideration is implemented on this very important subject.

Signed.....
Frances Buckingham Chair

Signed.....
Robert Robinson Secretary

Dated

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Welshpool SY21 7PG
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MONTGOMERYSHIRE LOCAL COUNCIL FORUM

THE PETITION

We call on the National Assembly of Wales to urge the Welsh Government to issue guidance to Local Planning Authorities to ensure that communities are properly consulted on wind farm developments, electricity hubs, pylon lines and transportation connected to, that impact on the local communities is properly assessed and that the broader effects of the scheme on sectors such as tourism are properly considered before any development is approved to take place. We believe that the only way this can be properly concluded is by way of a public inquiry.

*Signed.....
Frances Buckingham Chair of the Forum*

*Signed.....
Robert Robinson Secretary to the Forum*

Dated: 6th May 2011

**PICTURES TO SUP THE PORT MONTGOMERYSHIRE LOCAL COUNCIL
FORUM PETITION**



**SOME GENERAL PICTURES OF NARROW LANES IN MID WALES
SIMILAR TO THOSE PROPOSED FOR LARGE WIND FARM LORRY
TRANSPORTATION**



**THE 1KM SQUARE SUB STATION IN THE RURAL COUNTRYSIDE NEXT TO
SETTLEMENTS**



THE PYLON LINE PROPOSED THROUGH THE COUNTRYSIDE



THE SIZE OF THE PYLONS PROPOSED



THE SIZE OF THE WIND FARMS PROPOSED



THE SIZE OF THE LARGER LORRIES PROPOSED

MONTGOMERYSHIRE LOCAL COUNCIL FORUM

Robert A Robinson FRICS AILCM
Secretary



Telephone [Redacted]
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6th May 2011

Alun Davidson
Welsh Assembly Government
Cardiff Bay
Cardiff
Wales

Dear Alun

Mid Wales Wind Farms

Good morning, I hope you are well.

The enclosed petition is seeking a intervention by the WAG into the wind farm issues and the practicality of a large number of wind farms in the Mid Wales area creating a hub (1km square) and pylon lines (400kva).

The Councils represented on this forum and who subscribe to this petition are:

WELSHPOOL,

As we now have a new Assembly elected the reasons for this request are set out here:

Lack of consultation

The County Council is not giving the community councils an opportunity to discuss or represent their views fully in an open debate; this can only be achieved with a public inquiry.

Lack of local knowledge

It is clear that the companies are not taking into account the local environment. Every wind farm constructed so far in the UK has underestimated the transport, tourism and local economy issues which flow from the wind farms which in turn bring the electricity sub station and pylon lines.

Co-ordination

There appears to be a lack of co-ordination to ensure that an overall picture is presented and considered before any wind farm and ancillary works applications are considered including the hub and pylon lines.

Cont....

Overall effects on Mid Wales

The overall effect on a fragile economy, particularly with regard to tourism, is not being considered properly. With not only the shorter term transport issues there is the longer term issues of pylon lines blighting the countryside removing the attraction for people to live in an area which relies greatly on its retiring population.

Hub and Pylon Lines

The location of the hubs and pylon lines are ill thought out with communities close to such development proposals. The production of electricity via the wind farms, which produce this need for hubs and pylons, are not economic (this is recognised) and therefore we can not see the need to decimate the local economy on that basis.

Representation

The people of Mid Wales feel that the Wind Farms, hubs and pylons are being imposed without proper consideration and to ensure that this is redressed a public inquiry is the only way forward. There have been many demonstrations and public meetings held in the past year, they demonstrate the level of public feeling which must be recognised.

The public of Mid Wales do hope that you will find it possible to support such action and insist upon a public inquiry so that whole issue of Wind Farms, hubs and pylons can be covered with special emphasises on the effect relating to the local communities.

I shall also be taking a copy of this petition to Westminster in the coming weeks seeking their support for a public inquiry.

I have not offered a full report as I know time is precious and you will be aware of many of the detailed issues. However, if you wish to have a full report on our concerns I can arrange this for you.

Thank you again for your time.

Yours sincerely

Robert A Robinson FRICS AILCM
Town Clerk

**WELSHPOOL TOWN COUNCIL
TRANSPORT ESTIMATES FOR WIND FARM CONSTRUCTION
APPENDIX C**

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	2,100	2,100
CONVOY PER YEAR	700	525	420
LARGE CONVOYS PER WEEK VIA WELSHPOOL (25%)	4	3	2
LARGE CONVOYS PER WEEK VIA NEWTOWN (70%)	9	7	5
LARGE CONVOYS PER WEEK VIA OTHER AREAS (5%)	1	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 AILC Dated 11.9.2011