

NORTH WALES ASSOCIATION OF TOWN AND LARGER COMMUNITY COUNCILS

PUBLIC INQUIRY INTO WIND FARM DEVELOPMENTS IN MONTGOMERYSHIRE POWYS (POLICY)



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1.00. The Association

- 1.01 The North and Mid Wales Association of Local Councils represents 34 Town and Community Councils from Newtown and Welshpool in the south to Flint, Prestatyn, Rhyl and Bangor in the north.
- 1.02 The Association has discussed in much detail the Welsh Assembly renewable energy policy and TAN8 as it relates to Mid Wales and the current public inquiry starting in June 2013.
- 1.03 The views expressed in this paper are those of the Association collectively.
- 1.04 The Association at its Annual Conference in 2012 discussed in detail the Wind Farm proposals and their effects. It was following that Conference that the Policy of the Association was formed in outline.

2.0 The schemes the subject of this Inquiry

ELECTRICITY ACT 1989 (SECTIONS 36, 37, 62(3) & SCHEDULE 8):
TOWN AND COUNTRY PLANNING ACT 1990 (SECTION 90):
APPLICATION BY VATTENFALL DATED 30 NOVEMBER 2007 FOR
CONSENT TO CONSTRUCT AND OPERATE A 59.5MW WIND TURBINE
GENERATING STATION IN POWYS, MID-WALES (“LLANBADARN
FYNYDD”)

APPLICATION BY FFERM WYNT LLAITHDDU CYF DATED 7 MAY 2008
FOR CONSENT TO CONSTRUCT AND OPERATE A 66.7MW WIND
TURBINE GENERATING STATION IN POWYS, MID-WALES (“LLAITHDDU”)

APPLICATION BY CELTPOWER LIMITED DATED 9 MAY 2008 FOR
CONSENT TO CONSTRUCT AND OPERATE A 126MW WIND TURBINE
GENERATING STATION IN POWYS, MID-WALES (“LLANDINAM”)

APPLICATION BY RES UK & IRELAND LIMITED DATED 27 MARCH 2009
FOR CONSENT TO CONSTRUCT AND OPERATE A 100 MW WIND
TURBINE GENERATING STATION IN POWYS, MID-WALES
 (“LLANBRYNMAIR”)

APPLICATION BY RWE NPOWER RENEWABLES LIMITED DATED 11
DECEMBER 2008 FOR CONSENT TO CONSTRUCT AND OPERATE A
130-250MW WIND TURBINE GENERATING STATION IN POWYS, MID-
WALES (“CARNEDD WEN”)

3.00 History

- 3.01 The Association has considered the evidence of the Montgomeryshire Local Council Forum and agrees with the history set out below.
- 3.02 TAN8 was adopted in 2005 and at that time very few Assembly Members understood what was destined for Mid Wales with regard to the scale and infrastructure.
- 3.03 In November 2006 Welshpool Town Council made the public of their town aware of the possible effects including the transport and transmission line.
- 3.04 In March 2007 Welshpool Town Council held a public meeting and at this meeting the effects of the wind farm developments in total was presented. Pictures of the size of turbines, size of lorries and size of pylons were put forward. Many thought that this Council was scaremongering and did not believe what was proposed.
- 3.05 There have been many public meetings and demonstrations held over the last 3 years, a much larger level of concern being shown than in many other cases over the whole of the UK.
- 3.06 Since 2008 the public have become more aware of the proposals and in last 18 months many protest groups have emerged to alert people of the magnitude of the proposals being put forward.
- 3.07 There have been a number of Montgomeryshire surveys carried out at various times from June 2011 to February 2013. The results are available for inspection. In general 80% plus of the residents of the areas surveyed are very concerned about the developments proposed and object to the sheer scale of such proposals with the resultant effects on the area.
- 3.08 The surveys were carried out by Welshpool, Llanfair Caereinion, Llandysilio, Llandrino & Ardleen, Llanfechain, Meifod, Llansantffraid, Berriew, Kinnery and others.
- 3.09 Over the past 3 years the Association has presented petitions against the wind farm development proposals with regard to all aspects (including transport and the infrastructure) to both the Welsh Assembly and to Westminster. The Association has also presented its case to a Committee at the Welsh Assembly and it was clear at that meeting that Assembly Members were not aware of the effects to TAN8 when it was approved.

- 3.10 The Association was joined with the Montgomeryshire Forum for a trip to meet with a select Committee in Parliament. The Committee was chaired by Tim Yeo MP. The forum was asked by Tim Yeo MP (chair) of the select committee a question: *If the proposals were substantially reduced would your communities find it acceptable.* The response was: *'There is a chance, if the wind farms are reduced in number so that there is no need for a hub, the pylon line is reduced to 132kv with the reduction in transport then we would go back and ask the electorate.'* This was never taken forward and no offer of a reduced overall proposal has every come forward for consideration.
See transcript at appendix E.

4.0 Policy of the North Wales Association of Town and Larger Community Councils

1. The Policy of the Association was agreed and adopted at their meeting held on 19th April 2013 and is set out at appendix A.

Among the reasons for such objection are:

- a) The lack of proper consultation with Town and Community Councils at each stage of such an important project is unacceptable.
- b) A consultation is not considered to be a consultation when all that is offered is plans with a question and answer session.
- c) Effects on the environment and in particular transportation.
- d) Effects on business and in particular tourism.
- e) The level of opposition from residents of Montgomeryshire.
- f) Health risk involved.
- g) Wind Farms are not economic and without subsidies they are unlikely to be built.

5.00 Public Opinion

- 5.01 The Association is aware of the large level of concern shown by residents of Mid Wales and recognises the surveys carried out by many Town and Community Councils.
- 5.02 The Association also notes that the results of these extensive surveys which show:

Wind Farms

89.2% were against wind farm development.

Pylon Line

81.05% were concerned about the Pylon Line proposed

Electricity Hub

84.5% were concerned about the Hub to support the schemes.

Transport

79% were concerned about the effects of the transport needed.

- 5.03 A schedule of these survey results are set out at appendix B.

6.00 Objections to TAN 8 and the Renewable Energy Policy for Mid Wales

6.01 General position of the Association

The Association is against wind farms and does not accept that they are viable taking into account the need for the extensive infrastructure to support them.

The Association is also of the view that the scale proposed with the extensive infrastructure and transport needs of such developments was not in the minds of the Welsh Assembly as the eventual outcome.

The Association holds the general position that the proposals contained within TAN8 are out of scale and the damage caused by such proposals is not in balance with the need to provide renewable energy against the environment in which it is to be located.

6.02 Assembly Letters

It is clear from statements made by the Ministers at the Welsh Assembly that the Assembly did not fully understand what it was approving when TAN8 was introduced.

6.02.1 This is evidenced by the statement of the First Minister in the press that the Welsh Assembly would not support larger pylon lines in Mid Wales. However the Welshpool Assembly has shown that it will only commit to responding to the connections from the wind farms to the proposed substation where they are seeking that the transmission line should be on wooden poles or underground in writing. This appears to mean that the Welsh Assembly will not support the communities with regard to the 400kv line. Please see evidence of this at appendix C.

6.02.2 The following are extracts from the papers at appendix C & D which relate to the Welsh Assembly position on TAN8 developments:

Statement by Welsh Government – 17th June 2011

- a) 'The indicative capacities set out in TAN8 in 2005 reflected a considered view of the potential impact of grid and transport connections. However, in a number of SSA's, developer interest has now greatly exceeded those indicative figures. The Welsh Government believes this level of development is unacceptable in view of the wider impacts of the area.'
- b) In our (Welsh Government) view the TAN8 capacities should be regarded as upper limits and we call upon the UK Government to respect this position when then finalise the renewable energy statement and not to allow proliferation when they take individual decisions in Wales.
- c) It is this capacity which has lead to proposals for a major new overhead grid structure. We (Welsh Government) contend that the

level of capacity with the SSA's which we set in 2005 would negate the need for the large intrusive pylons which are causing concern.

- d) My Government would not support the construction of large pylons in Mid Wales and my Ministers are pressing the case with National Grid Transmission and with Ofgem.

Letter from Welsh Government – July 2011

- e) We (Welsh Government) also need to ensure that windfarm development within the SSA's is proportionate and balanced with other development needs in these areas. Our approach is to limit the development of large scale wind farms to the areas of Wales which were independently and empirically assessed to be most suitable. These are the 7 SSA's in TAN8. Further, wind farm development should not reach such a scale that it would necessitate other developments that would run counter to the policy positions set out in TAN8, for example the transmission network re-inforcement.
- f) TAN8 set out the government's view that connections from individual turbines to a sub station is via 'underground cables'. TAN8 details any connection from a substation to the nearest point of the distribution network should be achieved by a standard 3 wire system on wooden poles or by underground lines.
- g) Provided development is limited to the maximum capacities (set out above), we do not believe there is any need for a large, visually intrusive, high voltage grid network infrastructure and associated sub station of the kind proposed in Mid Wales.

The above shows that one of two situations now exist which are:

Either: The Welsh Assembly did not understand what it was approving in 2005 with TAN8.

Or: The proposals are an overdevelopment of Mid Wales and such development should be reduced to meet the Welsh Government's view on what they consider is acceptable infrastructure.

6.03 Unknown details and limit of transmission lines

The transmission line is causing a lot of concern. National Grid have already confirmed that some of the line will be underground and some above ground. However the amount of each element is unknown and is not confirmed. Neither is the actual route of the line, only a corridor of a preferred route.

The Welsh Assembly (as evidenced by the papers at appendix C and D) shows that they do not envisage development to be at a level which requires a larger 400kv pylon line. The developments proposed (according to National Grid proposals) appear to be in excess of the levels proposed in TAN8.

It can be noted that the Hinkley connection has 8km underground along a line of 50 km.

It can also be noted that the Bramford & Twinstead connection has also 8km underground along a line of 35 km.

On this basis if we apply the same percentages to the Mid Wales connection we have real reasons to be very concerned.

6.04 Fragmented decision making

The decision making process for the whole renewable energy programme for Mid Wales is flawed with no one authority taking control of decision making.

The public find they unable to contact a single authority but having to speak to Parliament, Welsh Assembly and the County Council on different aspects of the overall proposals.

This leads to a lack of joined up thinking which is not of benefit to the communities involved.

To consider the Mid Wales Wind Farms properly and with transparency all the sites and infrastructure needs to be considered as a whole scheme and together.

This lack of joined up thinking leaves the Communities unable to ensure that the area is not destroyed to meet the requirements of TAN8.

6.05 Premature development

The Association is strongly of the opinion that in policy terms these developments are premature. This is evidenced by the unknown elements of the infrastructure that must surely be known before any decision can be reached. Without such details the full effects of the developments can not be appreciated.

6.06 Out of Scale – upper limit in TAN8

The Association notes that within the TAN8 document it refers to the level of wind farm development being an 'upper limit'.

The Association feels that the current level of wind farm developments proposed is out of scale and is too dominant for such an area as Mid Wales.

To that end the Association would urge that consideration be given to a delay in any consideration of further applications until:

- a) The full effects of the transmission line are known.
- b) The overall scale is re-assessed and a lesser scheme detailed within a revised TAN8 document.

6.07 Review of TAN8

The North Wales Association of Town and Larger Community Councils asked Assembly Members for support in a review of TAN8 and copies of their responses are shown at appendix D.

It is a long time since TAN8 was introduced and in view of the Assembly Ministers comments with regard to the transmission line a review should be carried out before any further developments for wind farms are taken forward.

Even with the information that is available now it is clear that the policies noted in 6.02.2 above are being ignored. On this basis the Policy is flawed or not being followed and fully taken into account

6.08 Reasons for objection to TAN8

The reasons that the developments proposed are wrong in Policy terms are:

- a) The Level of public concern is far in excess of what would be envisaged since the TAN8 document was approved. Given that 'localism' is becoming more important this can not be ignored.
- b) The Assembly comments made with regard to the transmission line give clear evidence that they did not know the extent of the effects of TAN8 when it was approved.
- c) The public and residents of Mid Wales were not properly informed or consulted over such a major issue (TAN8) and therefore a proper consultation could not have taken place. This is not an acceptable way of imposing such large scale development on any community.
- d) Town and Community Councils do not feel that they have been consulted, at liaison meetings they have been 'talked at' or 'given information'.
- e) The overall effects of the proposed TAN8 policy are out of scale with the area and the benefits of the overall proposals against the affect on the environment, economy and tourism is out of balance and unacceptable.
- f) The TAN8 policy is now out of date and needs to be reviewed, as supported by many senior polititians.

7.00 Other information

There may be more supporting information offered during the giving of oral evidence.

8.00 Signature to the evidence hereby presented

**Cllr J Butterfield Chair
North Wales Association of Town and Larger Community Councils**

Dated.....