

Environment and Sustainability Committee

Inquiry into Energy Policy and Planning in Wales
EPP 231 - Brechfa Forest Energy Action Group



22 September 2011

Environment and Sustainability Committee
National Assembly for Wales
Cardiff,
CF99 1NA

Dear Members

We attach our submission to the Environment and Sustainability Committee. Our group has been in existence since 2003, well before the start of the consultation on the draft TAN8, and we submitted a full response at that time. Our own experiences with the first wind turbine development locally has actually confirmed our concerns and we very much hope that the Committee will take these on board. For example, included in it was a full outline of the implications of the connectivity that would be required – pylons. TAN8 was subsequently as published and approved by the Welsh Assembly ignored these potential problems

We also regret that the promises in 2009 made by Jane Davidson, Minister in the last Government, that TAN8 would be subject to review with full public consultation during 2010 was defaulted on. It brings the Welsh government into disrepute. We trust that the new Government and its Committees will seek to re-establish credibility in its concerns for energy, the environment and the economy of Wales.

Should we be invited to attend and present evidence to the Committee, we have a spokesperson to speak on our behalf, and would be grateful for the opportunity.

Yours faithfully

Caroline Evans

See attachment of Response and Appendix A – map of SSA G Brechfa Forest.



22 September 2011

Submission to the Environment and Sustainability Committee, National Assembly for Wales

Technical Advice Note 8 as implemented in 2005 has had many of the effects that was forecast in many of the consultation responses at the time. Our own response pointed out the potential problems with noise/vibration, with the effect on the roads and infrastructure, on the hydrology, on the landscape and on the fact that wind power installations require pylons to take the intermittent power generated to the grid.

We forecast that designating the Strategic Search Areas [SSAs] would lead to a free-for-all of developers targeting those areas. We thought it no co-incidence that each of the SSAs had large amounts of Forestry Commission land so that, as WAG owned that land, it was not going to encounter any blocking of developments. As it is, our own SSA – Area G Brechfa Forest, now has one wind power development of ten turbines [Alltwalis, formerly known as Blaengwen] at 110m high already up and commissioned on private farmland, now operated by Statkraft, whose installation has been fraught with problems and mis-management, the importation of Japanese Knotweed by the quarry lorries being one of the lesser impacts.

Our experiences and observations on our SSA can be mirrored in all the other SSAs designated by TAN8.

Multiple Applications

There are now three other applications in the pipeline for our particular SSA: two on Forestry Commission land, and one on Crown land and private farmland. Options have also been contracted for more on private farmland. Of the three applications so far, one will be processed by the Infrastructure Planning Commission [Brechfa Forest West – 28 turbines at up to 145m high], and two by the Carmarthenshire County Council [Brechfa Forest East 12 turbines at up to 145m high and Bryn Llewellyn 21 turbines at up to 127 metres high]. The developers on the Forestry Commission land are RWE N power and the other is RES Renewable Energy Systems. See Appendix A for an annotated map.

Our communities have been bombarded: mailshotted, invited to exhibitions, leafleted over the last 18 months leading to high levels of confusion – for example two different developers held exhibitions in Brechfa Church Hall within seven days of each other – most of the village residents thought it was the same development so didn't go to both, and yet both will affect them. Two developers with adjoining developments are proposing different access roads onto the mountain – so double environmental impact.

Noise/Infrasound Impact

The potential noise impact referred to in our original submission has unfortunately proved to be true. With the Blaengwen installation, the residents of Gwyddgrug

particularly have been affected and you will find first hand evidence presented to you by the Grwp Blaengwen. This nuisance has been recognised by the operators Statkraft as, following complaints, they circulated the telephone number of their central control station in mid-Wales so that any resident experiencing turbine noise day and night could telephone and they would switch the turbines off.

And do not think that this is a one-off, noise/vibrations/infrasound/strobe problems have been reported near wind turbine installations all over the world and the ETSU R1997 guidelines are hopelessly inadequate as it was based on data from 14 years ago and involved the smaller turbines; useless in these days of modern much larger turbines. Just recently, residents near the newly installed wind turbine development at Fullabrook, North Devon [22 turbines at 110m high] are reporting similar sleep disturbance, disruption of TV signal, vibration, chickens ceased laying and horses unnerved. Our local authority appears powerless to control such nuisance. The health implications are recognised by the World Health Organisation and we would ask that your Committee consider these effects, and certainly advise that Strategic Health Assessments should be undertaken and set set-back limits in excess of 2km.

Old data and carbon release from peat/deforestation

It is not only the ETSU guidelines that are out of date and inadequate – TAN8 itself, published back in 2005, was based on research and evidence based on technology and data sourced up to ten years BEFORE that date – newer advances in renewables, carbon storage and consumption reduction need to be taken into account. The carbon release from the peat destruction at the Cefn Croes wind turbine development was an example of what NOT to do! It has been called a carbon disaster The SSAs delineated by TAN8 all have peat deposits and areas of blanket bog and therefore provide essential carbon store for Wales, as recognised in 2010 by the “Future of the Uplands” published by the Welsh Assembly

***Recommendation 9.** The Committee calls on the Welsh Government to carry out an assessment of the impact of the forest estates windfarm programme on carbon storage, and for soil carbon management to be a central consideration in the review of TAN8. 38*

***Recommendation 10.** The Committee calls on the Welsh Government to review its planning guidance to local authorities so that there is a presumption against windfarm developments on deep peat.*

The clearance of forest for the construction and operation of wind turbines will also have a carbon impact and the same report expresses concern that there had been no assessment of the impact by the Forestry Commission Wales of the impact on the carbon on its national forest estates [section 105].

Recommendation: The Committee calls on the Welsh Government to carry out an assessment of the impact of the forest estates windfarm programme on carbon storage, and for soil carbon management to be a central consideration in the review of TAN8.

Landscape Impact

Our original response to the Draft TAN8 emphasised the impact on the natural and historic landscape of the Brechfa Forest, and this can be mirrored across the other SSAs – the uplands and valleys of Wales need protection. The impact of the large

numbers industrial scale turbines and the attendant pylons will not enhance the landscape and will only be made worse by the cumulative effect. If you care to visit the Brechfa Forest, we can take you to the top of the mountain and stand you at the trig point on Mynydd Llanfihangel Rhos y Corn. We can then turn you round 360 degrees – to start you will see the turbines at Blaen Bowi, turn a bit more you will see the turbines at Blaengwen much nearer you then turn a little more and you will see where the swathe of much taller 28 turbines at Brechfa Forest West would be even nearer to you, turn a bit more and you will see where the 12 turbines at Brechfa Forest East would be. Rotate a little more again and you will see where the 21 turbines at Bryn Llewellyn would be. TAN8 makes little of the landscape qualities within the SSAs and enabled the County Council Planning Committee to ignore the landscape impact of the Blaengwen turbines on the Special Landscape Areas nearby. Surely landscape protection should not be ignored by the Welsh Assembly?

Hydrology

With all the SSAs being uplands, they are therefore the source of the many streams and rivers flowing out of them. Already there is an impact from the Blaengwen turbines from the large amounts of concrete in the foundations and the drainage effect of the connecting infrastructure between the turbines in cabling and roads. Streams coming down from the col are experiencing higher levels of water and more incidents of flooding. The more turbine developments, the more the water run off and the higher the level of flood risk downstream. As the developers say – at the end of the turbine life they will remove the turbines – but NOT the foundations as that would cause too much environmental damage – well, putting the foundations in place causes environmental damage!

Flood risk was recognised in 2010 by the “Future of the Uplands” published by the Welsh Assembly

***Recommendation 11.** The Committee urges the Welsh Government to engage in discussions with the insurance industry regarding options for investment in land management practices that reduce flood risk.*

There has also been an impact on water levels in wells reported by home owners downhill of the Blaengwen turbines – we forecast this and it has happened.

Impact on the Economy/Tourism

All the SSAs are areas of natural beauty in its landscape – the old TAN8 is somewhat dismissive despite the areas being heavily promoted by Visit Wales and other Tourism organisation as places to visit – and none of the photos in their publications show any images of the wind “farms” that are there now. Could it be because they know that the large industrial scale turbines are destroying the landscape and tourists are increasingly avoiding them? We can report that three holiday lets with views of the existing ten turbines at Blaengwen have suffered booking problems because of the impact on the view, and that is just the ones who have been open about the effects. The recent Environmental Impact Assessments for the new applications have all been very dismissive of tourism’s contribution to the local economy but calculations have shown that, for example, the contribution into the economy of the area immediate to the Bryn Llewellyn site is in excess of £6.5 million, based on primary providers and tertiary businesses.

We ask that the Committee consider the economic impact of the designation of

SSAs – mostly located in areas that were recognised by the EU as Objective 1? That means areas with:

- low level of investment;
- a higher than average unemployment rate;
- lack of services for businesses and individuals;
- poor basic infrastructure.

We know that one guest house on the mountain has cancelled the construction of the planned self-catering units until the outcome of the applications is known – if they go ahead they plan to sell the property as is and leave the area. In their plan, the extra units would have required extra staff. Another person trying to sell her home to move to Australia to join her family has had the purchase suspended until the outcome of the application at Brechfa Forest East is known – and so it goes on. Income, Investment and confidence is lacking in areas blighted by the SSA designation.

Recognition of the importance of Tourism to the economy is shown by the announcement from the Business Minister Edwina Hart AM on 22 September 2011 that Tourism joins the other eight priority sectors for the Welsh Government Economic Renewal Programme, supporting the growth of Welsh Businesses and creation of jobs for the future development of Welsh economy. Tourism brings in over £650 million across Wales.

Insecurity of Supply

Intermittency and lack of security of supply and the need for stand-by generation plants are not taken into account in TAN8 – our observation of the turbines constructed at Alltwalis/Blaengwen again confirms our comments on intermittency and the danger to supply security – during the coldest times over the last two winters, the turbines blades stood stock still. Last week, a nice breezy week, only on one day did the blades turn and the lack of turning as become a local joke.

We ask that the Committee take into consideration that the unreliability of wind as a method of generation and the low levels of output from wind turbines and try to maintain a balance with more reliable and forecast able generators as well as stronger controls on carbon emissions and energy usage.

Roads

The problems with the large amount of traffic involved in the construction of just the ten turbines at Blaengwen with closures, delays, damage to the road surfaces and adjacent buildings/property have cost the economy and the state a great deal of money as well as the potential to endanger lives by delaying the emergency services. Multiply that by the additional numbers of turbines and pylon involved in the planned extra 62 in our SSA and then take all the other SSAs into account, and the cost will be astronomical, and none of it recoverable from the wind power developers.

European Directive on Environmental Assessment

However, what must be considered is the European Directive on Environmental Assessment which was taken into the law in Wales by the Statutory Instrument SI1656 [170 of 2004] and it made changes to the responsibilities when there is

conflict between proposed developments and the protection of the environment. The original TAN8 did not take these into account.

We are sure that the Committee in this new Assembly has full knowledge of this Directive and the impact on planning policy in Wales and that the Committee will be taking it into account in its discussions and deliberations.

Wind Turbine Developments so far - Brechfa Forest Area G 23.09.11

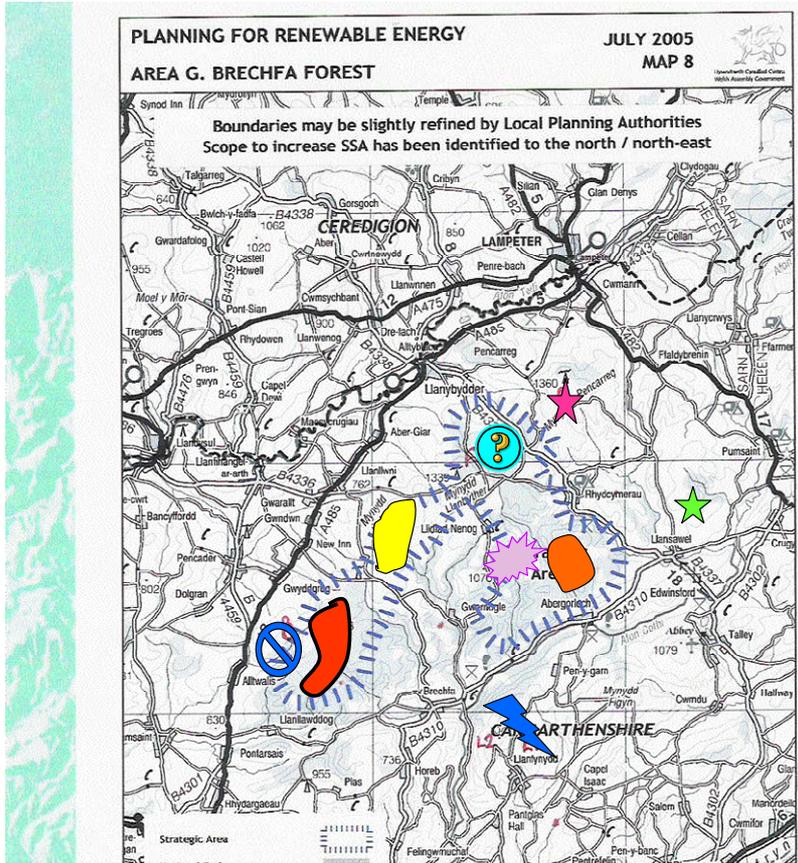
1. **"Blaengwen", now called "Alltwalis Wind Farm"** – operated by Statcraft – 10 turbines at 110.5 metres/365 ft high – total 30MW – original applicants Catamount/Force 9 sold out to Statcraft – **sound problems ongoing.**

Sites under application process:

2. **BRECHFA FOREST WEST** - RWE n power – Forestry Commission [FC] land and some private land – 28 turbines uphill from Blaengwen turbines 56 MW - up to 145m/476ft high – 2 wind measuring masts - application to IPC ongoing, may be heard Sept 2011? Pre-Application Stage - Draft Environmental Statement [ES] was on public display in Public Exhibitions – comments deadline 5pm 6 April – now awaiting the decision from the IPC if they will accept the application for consideration.
3. **BRECHFA FOREST EAST** - RWE n power 12 turbines on FC and private land between Rhydcymerau and Abergorlech – up to 145m/476ft high 24MW – 2 wind measuring masts – application lodged Carmarthenshire County Council E/24195 , deadline for objections 9 March 11 but still accepting letters
4. **MYNYDD LLANLLWNI BEING CALLED "BRYN LLYWELYN"** - RES – farmland and open common/crown land to the north-east of Brechfa Forest West– 21 turbines up to 127m/418 feet - 1 wind measuring mast – application to Carmarthenshire County Council lodged 14 Dec 2010 – No E/23947 – superceding larger IPC project – other developments may be coming see 7 below – deadline for objections 23 Feb 11 but still accepting letters

?? Sites suspected ? ?/:

5. **BANC MELYN** - RWE n power – Forestry land – monitoring mast has been sited here for some years – RWE n power deny they are planning to place turbines here
6. **LLANFYNYDD** - Gamesa sold out to Scottish Power – monitoring mast was in place for some years - land owner agreements still in place
7. **BANC FARM/CROSS IN FARM** – RES– landowner agreements now signed . Banc Farm – 6 to 8 turbines being discussed, maybe 10?
8. **MYNYDD PENCARREG** and near **LLANSAWEL** - ?landowners in discussion with developers?



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If you want to receive regular e-mail updates then contact me [addresses kept confidential]