

P-06-1268 Review the process for pre-assessed status for onshore turbines, which unfairly disadvantages individuals, Correspondence – Petitioner to Committee, 06.07.22



P-06-1268

Non Davies - Response for Petitions Committee 13 July 2022

PLEASE SEE MOELFRE LEAFLET – SPECIFIC REFERENCE TO SIZE GRAPHIC ON BACK PAGE

1. The 'Report on Draft National Development Framework' Dec. 2019 p.31 criticises the methodology used and questions whether the pre-assessed areas are fit for purpose to accommodate the large-scale developments envisaged. The Future Wales Plan 2040 fails to address and reconcile any of these criticisms.
2. There is no evidence of 'assessment' in the designation of the 'pre-assessed' areas across Wales. In respect of Area 1 (Conwy Berfeddwlad – Heartland) it appears that it was merely a desk top exercise avoiding Bryniau Clwyd to the East and Eryri to the West.
3. Despite the claim that there was extensive consultation with those affected including community and county councils we have evidence to demonstrate that this did not take place. The 'Consultation' timescale included the period of Covid 19 restrictions which severely restricted individual and organisational capacity and normality. This placed a severe restriction on fair and equitable consultation processes. We would still be unaware of the designation and unaware of the specific Moelfre proposal but for neighbours receiving 'Noise Agreements' to sign by the developers. Is this the open and transparent business model that you wish to promote? Clear Guidance would have set out the conduct and business model expected of the industry. As it is the developers' understanding appears to be that they now, via Future Wales Plan 2040, have 'presumed consent' to place 250-metre-high turbines within 700 metres of homes across Wales.
4. A FOI request for information about the absent Guidance **06.09.2021 - ATISN 15399 – Wind Energy Strategy and Future Wales:**
 - a. 4. The Report on the Draft National Development Framework (December 2019) refers to guidance that is being developed to inform Wind Energy Developments - can I have a copy of this Guidance please?

Elicited the following **Response**:

‘This guidance has not been produced yet’.

And did not set out the process for furnishing the Guidance,

It is clear to me that the delay in developing and producing the ‘Guidance’ is functional and that it will be written to fit the numerous specific proposed industrial turbine sites already established across Wales, some of them already within the 12 month pre-application period, rather than any proposals being submitted within the context of the Guidance. This clearly affords developers priority and disadvantages those most affected.

This reinforces my view that this is a done deal across Wales and explains the confidence and arrogance of the developer who advised me that the Future Wales Plan 2040 afforded him ‘presumed consent’ to place 250-metre-high turbines within 700 metres of our home. This developer was very well informed about the development and ‘consultation’ undertaken in respect of the Future Wales Plan 2040. Another representative of the developer confirmed that the developer had been in negotiations with local landowners since September 2020 (again during Covid 19 restrictions). The Future Wales Plan 2040 was published in February 2021.

5. The 2012 Guidance is not fit for purpose to describe what is envisaged and indeed promoted by the Future Wales Plan.

- Size of Turbines - 2012 Guidance p.12 :

‘Currently wind turbines consists of 60 -100 meters high towers with blades of 40-50 meters or more, so their overall height to blade tip is typically 100 -150 meters’. This will have a significant impact within 800 metres of homes. Turbines of 100-150m height will have significant impact on dwellings within 1.2 km

The Future Wales Plan 2040 enables the siting of 250-metre-high turbines within 700 metres of homes.

- **Impact on Health** – more is now known about the impact on existing and future health conditions e.g infrasound and low frequency noise (which cannot be determined by measuring audible noise which is the current practice). **Research does not envisage turbines of the size and scale envisaged in the FW Plan 2040.**
- **Impact of increased turbine height (100% +) on safety risks; flooding; ecology; habitat and wildlife has not been assessed nor addressed.**

6. There is other more detailed and robust Guidance already in existence for example Scottish Power and Local Authority documents. None of these envisage turbines of over 100 metres high:

- **SP Manweb: Planning Inspectorate Reference No. EN020014 Document reference: SPM NWWFC PHSIPD4 Appendix**

Author: Gillespies LLP

Guidance on the Application of Separation Distances from Residential Properties (May 2014) - Full Report

Residential Visual Amenity Assessment Trigger Distance (Potential 'Very Large' Scale of Visual Impact) notes that 100 metre-high turbines will have a significant impact on homes within 800 metres of homes. **The Future Wales Plan 2040 enables turbines of 250 metres high with no current Guidance. Is this fair and equitable without the 'rules of the game'.**

7. We are working with groups affected across Wales:

Letter Published Jointly Western Mail 26 November 2021 & Daily Post 29 November 2021

Future Wales renewable energy policies

When the Welsh Government introduced policies on renewable energy to the final draft of the National Development Framework, now enacted as Future Wales, they did so without subjecting those policies to analysis using the mandatory H M Treasury guidance known as the Green Book. Although an Integrated Sustainability Assessment was performed for the whole of Future Wales, no policy level analysis was performed, and some key features of the Green Book approach missed out.

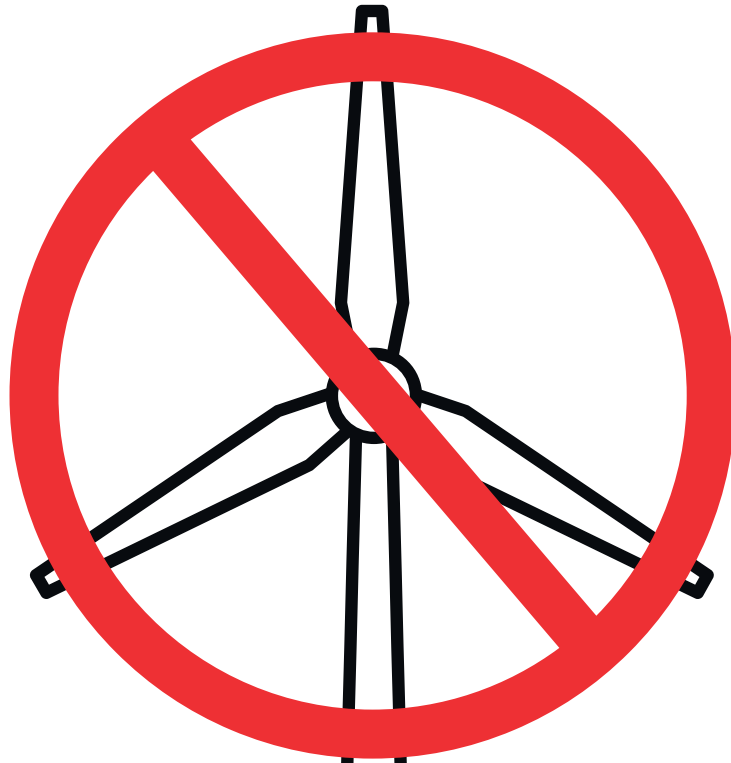
The Green Book requires effects on the value of "natural capital" to be included - this is the value society gives to less tangible assets such as landscapes, habitats and environments. While never as precise as estimating infrastructure costs or revenue streams, it crucially translates impacts on landscape etc into quantitative terms to weigh up against more tangible costs and benefits. Environmental assessments are usually qualitative, but often money wins, and descriptions, and landscapes, loose.

Also missing from Future Wales are the renewable energy guidelines on acceptability, promised during the public consultation - essentially the "rules of the game" for both developers and impacted stakeholders. We understand from the minister there is no deadline for these to be produced, although proposals under these policies will be submitted soon.

We strongly believe that the guidelines, including the need to assess the impact on "natural capital" value, should be available before the first application under these policies is submitted in the first half of next year. With the right "rules" then maybe the right decisions will be made, for the right reasons, about such Developments of National Significance like Y Bryn Onshore Windfarm and numerous other wind and solar developments. We believe that the renewable energy policies, and any emerging unintended consequences on communities across Wales, should be reviewed.

Yours sincerely,
Non Davies

MOELFRE



**YNNI GLÂN?
TA HEN DRO SÂL?
CYMDOGION DA
DYDWCH NA! (PLÎS)**

**CLEAN ENERGY?
FAIR PLAY?
GOOD NEIGHBOURS
PLEASE SAY NO!**

250m



14m

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**CRAITH AR Y TIR AC AR EICH CYMUNED YN DOD YN FUAN!
LLANGERNYW- BETWS YN RHOS-LLANFAIR TH
BLOT ON THE LANDSCAPE AND COMMUNITY
COMING SOON NEAR TO YOU!**

Size and Scale – approx. 20 Turbines up to 250 metres high with a 160m rotor diameter - unprecedented onshore. Turbines of this size and scale were not envisaged in any research on the adverse impacts on health, wellbeing, ecology, flooding etc. They are proposed in the Moelfre Uchaf area as close as 700 metres from residential properties. Solar Next?

Benefits – will be limited to those who gain financially, to the direct detriment of others who are concerned about loss of wellbeing, health, homes and livelihoods.

Community Fund from the developer is nothing more than a 'carrot' to the villages' residents, millions promised but over the lifespan when operating/producing power & only certain projects qualify. Not compulsory & possibly not honoured if/when the operation is transferred/sold on?

Litigation and Landowners – increasing litigation against developers, true extent unknown as many cases settled out of court eg UK Davis case. Landowners cannot be guaranteed indemnity especially if projects are 'sold on'.

Safety – The wind industry does not share its database with the Health & Safety Executive, the known rate of 222 annual accidents (SAS 2011) is an underestimate. Increased turbine size leads to increased risks.

Health and Wellbeing – concern about the impact on existing and future health conditions. Growing body of research about the impact of 'noise pollution', 'Low Frequency Noise'/LFN & 'Amplitude Modulation'/AM, lighting, turbine flicker etc, on people and animals, especially in tranquil areas.

Construction - displacement of soil by thousands of tonnes of concrete and steel for the enormous underground permanent turbine bases and required infrastructure, compounds and access roads. Each turbine construction site/pad is approx the size of a football pitch.

Impact on Landscape – this will be an industrial site with significant landscape change and adverse impact on not only the site itself but also the neighbouring designated 'Special Landscape Area' & viewed from many miles around with compulsory lighting disrupting the dark skies.

Wildlife and Ecology – significant impact on birds, bats & insects through collision, disruption and loss of habitat.

Future Wales – 2040 Plan – published (February 2021) and differs from the findings of the preceding National Development Frameworks & Local Development Plans. Evidence of assessment other than a desk top exercise to avoid, locally Snowdonia & Clwydian Range, all National Parks, AONBs & World Heritage Sites, is still awaited.

Lack of Guidance – promised guidance providing the 'rules of the game' for everyone, developers, public & planning inspectorate alike is awaited. How can applications be considered - and challenged without a clear basis and shared understanding?

Consultation – FW2040

Pre Assessed Areas – 10 areas for large industrial scale wind turbine development, with landscape able to accommodate change & with a 'presumption in favour'. No evidence of direct consultation with those affected most - local residents, relevant community councils and county councillors.

Were you aware &/or consulted.....we weren't.

Human Rights – Our rights to object have been curtailed.

The developers have all the power and resources whereas we have limited access to free or affordable help and advice.

Grid Network – shared with other energy sources, the current infrastructure has inadequate capacity to accept and store any excess energy. Until this is resolved aren't we putting the cart before the horse?

Constraint Payments – over the last decade electricity customers have paid a billion £s (yes £1,000,000,000 - nine zeros) via their electricity bills to developers in constraints payment i.e. to switch them off when the grid's at full capacity.

Green Energy? –Sourcing and manufacturing of the required materials - concrete, steel, copper, aluminium, rare minerals produces vast amounts of CO2 and has an adverse impact on the poorest countries. Turbine blades are not generally recycled & shed micro plastics/BPA pollution.

Net Zero? - with increasing energy costs, growing concern that governments are hitting targets but missing the point. Wind Turbine energy can never achieve net zero as it is reliant on other expensive unproven backup energy sources to supplement it. What it can achieve is vast profit for developers.

Bute Moelfre Energy Park

We would still be unaware of Bute's proposal if neighbours had not disclosed that they had received a letter asking them to sign a 'Noise Agreement' with an annual financial incentive.

Flooding Risk – Significant flooding at Llanfairtalhaiarn 3 times in the last decade, most recent (Storm Ciara February 2020) resulting in NRW Flood Risk Management Strategy (2020). Increased risk due to felling trees and the turbines' concrete bases creating more water runoff.

Democracy? – as a Development of National Significance (DNS) the application will bypass local decision making and be submitted directly to the planning inspectorate to decide whether any adverse impact from the development is acceptable or not. But a single Welsh Minister can overrule the inspector's decision "in the greater public interest", "due to the increased climate emergency" &/or as it's "only being for the duration of the lifetime of the development's operation".....which can be up to 50yrs & extended!! This overrides FW2040's safeguard Policies 17 & 18 leaving the most affected individuals unprotected, 'collateral damage' & with no compensation.

First of Many – This proposal will not be the last. If approved our whole 'pre-assessed area' could be targeted by developers as has happened in Scotland. There have been no large-scale wind farms in England since 2016 legislation limiting them with English planning law giving local authorities/communities the final say. It appears to us that Scotland and Wales are destined to provide England's energy needs, with the backing of their governments, to the detriment of their people, country and communities. Targets are set unnecessarily high, possibly to cater for exporting the surplus energy, good for the economy but not for the environment or rural landscapes.

Next Steps – This development will scar the landscape and our community. Is it worth it? We need your support, you may be affected by the next application. If you have any questions or comments or need more information, ie: links to helpful websites, references used in above, please get in touch via our email:

Moelfre2022@gmail.com

Maint a Graddfa – tua 20 tyrbein hyd at 250 metr o uchder gyda llafn diamedr 160m – digynsail ar y tir. Nid oes ymchwil ar yr effeithiau andwyol ar iechyd, llesiant, ecoleg, llifogydd ayb wedi rhagweld y maint yma. Maent i'w codi yn ardal Moelfre Uchaf, o fewn 700m i'n cartrefi. Solar Nesaf?

Buddion – wedi eu cyfyngu i'r rhai sydd yn elwa'n ariannol ar draul eraill sydd yn poeni am golli llesiant, iechyd, cartrefi a bywoliaeth.

Cronfa Cymuned – llwyed o fêl efo'r ffisig gan y datblygwr, addewid nad yw'n caei ei gwireddu yn llawn, gyda meini prawf caeth ac yn ddibynnol ar elw. Nid oes modd gorfodi'r taliadau na'u gwarantu os gwerthir y cynllun.

Tirfeddianwyr ac Atebolrwydd Cyfreithiol – mwy a mwy o achosion cyfreithiol yn erbyn datblygwr a thirfeddianwyr, y rhan fwyaf yn cael eu setlo tu allan i'r llys e.e. achos Davis UK. Nid oes modd gwarantu indemniad i'r tirfeddianwyr yn enwedig os ydy'r safle yn cael ei werthu mlaen.

Diogelwch – Nid yw'r diwydiant gwynt yn rhannu gwybodaeth gyda'r Gweithgor Iechyd & Diogelwch, mae'r 222 damwain blynyddol sy'n cael ei nodi (SAS 2011) yn llawer uwch na hynny mewn gwirionedd. Mwyaf po maint y tyrbein, mwyaf ydy'r risg.

Iechyd a Llesiant – effeithiau ar gyflyrau iechyd presennol ac yn y dyfodol. Mwy a mwy o ymchwil ar effeithiau 'llygredd swm amledd isel' & 'Modiwlleiddio Osgled'; goleuadau hedfan; crynodod; 'flicker'; ar bobl / anifeiliad ac ar ardaloedd heddychlon.

Adeiladu - dadleoli miloedd o dunnelli o bridd gan concrit a dur ar gyfer sylfeini'r tyrbeini (maint cae peldroed ar gyfer pob un), ffyrdd mynediad, isadeiledd a compounds.

Effaith ar Dirlun – safle diwydiannol gydag newid tirlun arwyddocaol ac effaith andwyol gan gynnwys ar 'Ardal Tirwedd Arbennig' fydd hwn, yn amlwg am filltiroedd lawer gyda'r goleuadau parhaol yn tarfu ar yr awyr dywyll.

Bywyd Gwyllt ac Ecoleg – effeithiau arwyddocaol ar adar, ystlumod, pryfaid ayb drwy darfu, golli cynefin neu wrthdrawiad.

Cynllun Cymru'r Dyfodol 2040 – (cyhoeddwyd Chwefror 2021) sydd yn gwyro oddi wrth y Fframweithiau Datblygu Cenedlaethol a Chynlluniau Datblygu Lleol blaenorol. Ymddengys yn asesiad 'desg' yn unig er mwyn osgoi'r parciau cenedlaethol megis Eryri, Bryniau Clwyd, ardaloedd hyfrydwch neilltuol a safleoedd treftadaeth.

Diffyg Canllawiau – rydym yn dal i aros am y canllawiau neu 'rheolau'r gêm' i bawb - datblygwr, arolygiaeth, cyhoedd ayb. Sut mae modd ystyried ceisiadau - neu eu herio - heb feini prawf clir?

Ymgynghori

Ardaloedd wedi eu 'asesu' – 10 ardal ar gyfer datblygiad ynni gwynt diwydiannol, newid tirlun arwyddocaol a 'rhagdybiaeth o blaid'. Does dim prawf o ymgynghoriad uniongyrchol gyda'r rhai sy'n cael eu heffeithio fwyaf - preswylwyr lleol, cynghorwyr cymuned a sirol perthnasol.

Oeddech chi'n ymwybodol? Doeddau ni ddim.

Rhwydwaith Grid – fe rhennir hwn gyda ffynhonnellau egni eraill, nid oes gan y seilwaith presennol allu digonol i dderbyn a storio ynni dros ben. Nes fydd y diffyg hwn wedi ei ddatrys onid rhoi'r drôl o flaen y ceffyl ydy hyn?

Taliadau Cyfyngu – mae Biliwn o bunnoedd mewn taliadau cyfyngu (h.y. i droi'r tyrbeini ffwrdd pan fo'r grid yn llawn) wedi eu rhoi i ddatblygwyr dros y degawd olaf, trwy filiau trydan cwsmeriaid.

Ynni Glan? – mae cyrchu'r deunyddiau sydd eu hangen - concrit, dur, copr, alwminiwm, mwynau prin yn cynhyrchu symiau helaeth o CO2 ac yn cael effaith andwyol ar y gwledydd tlotaf. Nid oes modd yn gyffredinol i ailgylchu'r llafnau a maent yn gollwng microblastigau a llygredd BPA.

Net Zero? - gyda chynnydd prisiau ynni mae pryder fod llywodraethau yn llygadu'r targed ond yn methu'r pwynt. Ni all ynni Tyrbein gwynt wireddu net sero gan ei fod yn dibynnu ar ffynonellau ynni wrth gefn. Yr hyn y gall ei wireddu ydy elw enfawr i ddatblygwyr.

Maes Ynni Moelfre Bute

Byddem dal heb fod yn ymwybodol o gynllun Bute pe na bai cymdogion wedi datgelu eu bod wedi cael cais i lofnodi 'Cytundeb Swm' gyda chymhelliant ariannol blynyddol.

Llifogydd – Cafwyd llifogydd difrifol deirgwaith yn y degawd diwethaf, gyda Storm Ciara (Chwefror 2020) yn arwain at Strategaeth Perygl Llifogydd CNC (Cyfoeth Naturiol Cymru / Natural resources Wales). Mae mwy o risg gyda thorri coed a sylfeini concrit yn achosi rhediad dwr.

Democratiaeth? – Fel Datblygiad o Arwyddocâd Cenedlaethol fe fydd y cais yn osgoi democratiaeth leol ac yn mynd yn syth at yr arolygiaeth cynllunio i benderfynu os ydy'r effaith yn dderbyniol ai peidio. Fe all un Gweinidog Senedd wrthdroi'r penderfyniad 'er budd y cyhoedd', oherwydd yr argyfwng hinsawdd neu ei ganiatau dros gyfnod penodol gall fod yn hanner canrif neu fwy. Mae hyn yn disodli Polisiau 17 & 18 gan adael y rhai sydd yn cael eu heffeithio fwyaf heb amddiffyniad nag iawndâl.

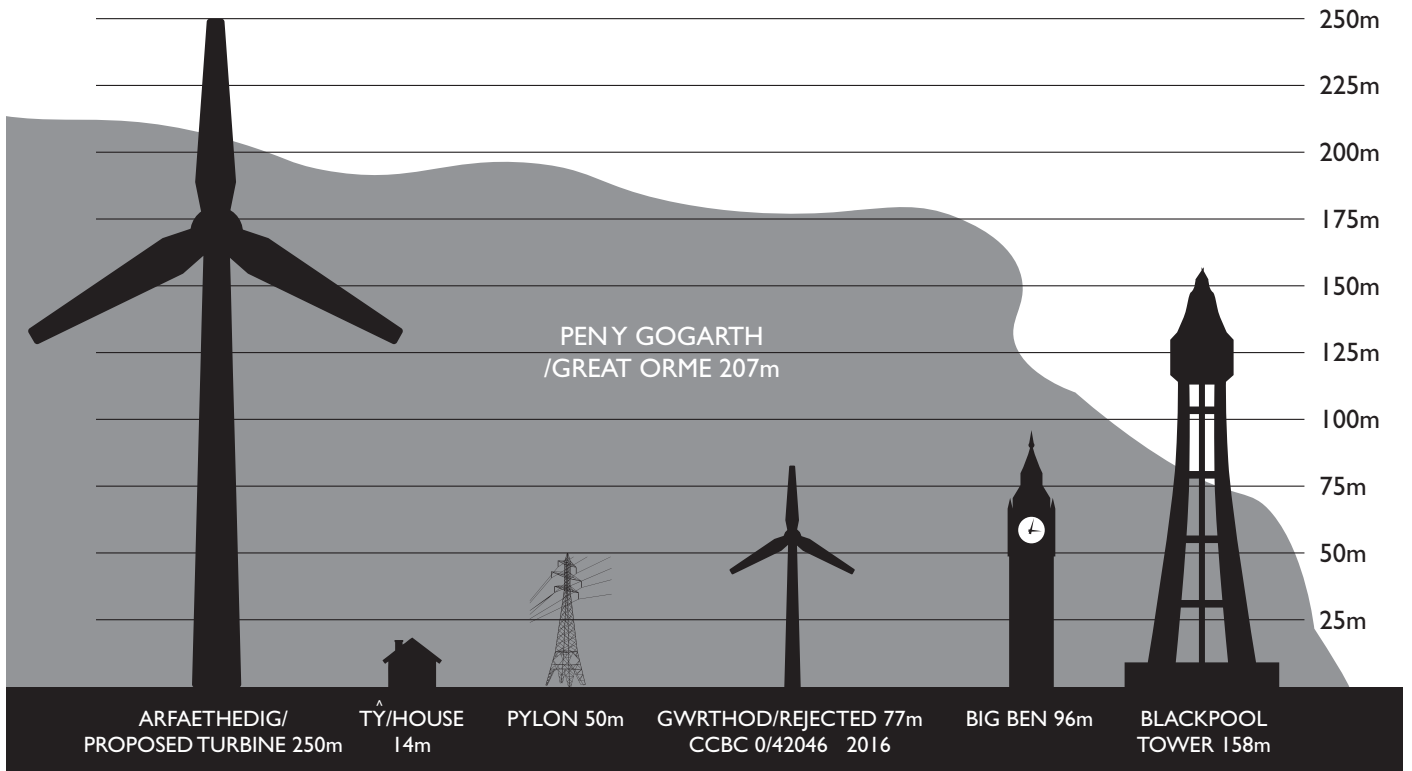
Iawnderau Dynol – Mae ein hawliau ni i wrthwynebu wedi eu cwtogi. Mae gan y datblygwyr rymoedd ac adnoddau dibendraw lle nad oes gennym ni fynediad i gymorth a chngor fforddiadwy.

Cyntaf o Amryw – Nid hwn fydd y cynllun olaf. Fe fydd datblygwyr yn targedu'r ardal 'ddynodedig' gyfan fel sydd wedi digwydd yn yr Alban. Does dim datblygiadau o'r fath wedi bod yn Lloegr ers 2016 gan fod rhaid cael cefnogaeth leol. Mae'n debyg fod Cymru a'r Alban am ddarparu ynni Lloegr gyda chefnogaeth Llywodraeth Cymru, ar draul ei phobl, ei gwlad a'i chymunedau.

Mae'r targedau a osodir yn cynnwys ynni Lloegr, mae hyn yn fanteisiol i'r datblygwyr ond nid yr amgylchedd na thirluniau gwledig.

Camau Nesaf – Fe fydd y datblygiad yma yn creithio ein tirlun a'n cymuned. Ydy o werth o? Mae angen eich cefnogaeth arnom, efallai mai chi fydd yn cael eich effeithio nesaf. Os oes cwestiynau gennych neu angen fwy o wybodaeth e.e. cyfeiriadau ayb cysylltwch â ni drwy ebost. Diolch am ddarllen. Moelfre2022@gmail.com

SIZE COMPARISON / CYMHARIAETH MAINT



MWYNHEWCH TRA GALLWCH! / ENJOY WHILE YOU CAN!



'Llwybr Olygfaol' Llangernyw A548 'Scenic Route'

SAFLE MOELFRE O FEWN ARDAL I 'A ASESWYD YMLAEN LLAW' (CYNLLUN CD 2040) MOELFRE SITE WITHIN 'PRE-ASSESSED AREA' I (FUTURE WALES PLAN 2040)

