

Galar's submission with regard to e-Petition P-04-324: Say No to Tan 8 - Windfarms & High Voltage Power Lines Spoiling our Community

The Petition

The Welsh Assembly Government Technical Advice Note (TAN) 8:- Planning for Renewable Energy (2005) document provides advice and guidelines which without doubt result in the desecration of our beautiful Mid-Wales Countryside. Following these guidelines, will spoil our beautiful landscape, increase health risk from electro-magnetic radiation, damage tourism which is one of the main employment sectors, devalue properties and cause major environmental damage.

When the technical advice note popularly known as TAN 8 was issued by the Welsh Assembly Government in 2005, the local population did not truly grasp the scale of what it meant to the inhabitants of Mid Wales.

The Technical Advice Note TAN 8 will allow hundreds of huge wind turbines to be built upon wind farms within our communities.

As a result of the construction of these wind farms the National Grid will be obliged to construct power transmission lines to carry the power to where it is needed, although it is recognized that the National Assembly for Wales are not involved in the decision to route these power lines.

We call upon the National Assembly for Wales to urge the Welsh Government to undertake a major review of the TAN 8 policy to include more public consultation

GALAR supports the request for a major review to TAN 8 asks the petitions committee to consider the following points:-

- TAN 8 was written under the constraints of Town and country planning acts, and therefore no offshore energy sources were considered. The potential for offshore energy in Wales is far greater than onshore. A reviewed TAN8 should take into account all areas of Wales inclusive of the seabed to 12 nautical miles from the shore.
- The strategic search areas available were chosen, not for their viability, but as areas of poor quality land, assessed from an agricultural viewpoint. The NEA report published this year recognises these areas of having very significant value in ecology terms as being carbon sink areas, although many of those areas are under threat of turning to carbon source after years of forestry mismanagement, producing inferior timber. A reviewed TAN 8 should look at land value from an ecological viewpoint.
- TAN 8 set out criteria in topics such as plate capacity and visual impact, that should be adhered to in an SSA, and also on the basis of these plate capacities, the ability, local to the SSA of being able to accept grid infeed. Developers have ignored these guidelines, which has led to a situation where massive pylon structures are required to transport infeed vast distances, (typically 40 Km) to an industrial point acceptable to the grid. The only way, with a conventional wind turbine, to increase plate capacity; is to increase the height to

blade tip. For every metre higher vertically the linear distance between the turbines increases by a factor of 8, because of the air turbulence created by the larger rotors. Air turbulence transmits sound, the greater the turbulence, the greater the distance. The larger the turbine in relation to land mass the worse the visual amenity. All these guidelines set out in TAN 8 final report 2006 have been ignored to the detriment of rural residents. Yet Local Planning has been under duress from WAG to accept the developers disregard for TAN 8. A review of TAN 8 should set limits to which the developer must adhere, or lose the entitlement to resubmission.

- TAN 8 passed the responsibility of the EIA to the developer. This has led to poor standards of habitat protection, ignoring completely seasonal breeding and feeding and development of hard standings and other concrete or quarry product footprint far higher than required. The reason for passing on this responsibility is purely cost and abdication of responsibility. A reviewed TAN 8 must take the EIA out of the developer's hands and put it firmly into the control of the building inspectorate, to avoid jerry building, and poor habitat protection.

General Comments

- 1) Ove Arup made a very good job of the TAN 8 Final Report to Carmarthenshire County Council. From an engineer's viewpoint it is an easy report to see how they were trying to give reasonable visual amenity while providing an acceptable plate capacity, and their conclusions on other site factors. Had not recommendations been ignored, there would be less contention. However, the firm should not make policy decisions that rightly belong with WAG. Their advice should have been mitigated with local involvement in SSA's
- 2) Hydrology should pass from TAN 8 to TAN15, and TAN 15 should be strengthened. Flood from upland sources is a threat throughout Wales, and cannot be left in the hands of companies with little experience, or the will, to spend money on undertaking a thorough job, its direction, inspection, and approval should rest with the Environment Agency.
- 3) DECC are a non elected body, charged with promoting wind energy by the Westminster Government. They are too politically involved to be considered having a balanced view on renewable energy. Wales is well blessed in academic expertise, in matters regarding global warming and renewable energy, we are a devolved nation and should have our own unbiased, science based committee, regarding green energy, carbon sink technology and recycling.
- 4) TAN 8 should be reviewed to examine all forms of energy, (fossil and renewable), carbon capture, and recycling to form a cohesive policy. It should be noted however that the interdependence with England, especially in the border counties, requires a fundamental rethink and equitable sharing of the burdens green energy imposes on the economies of the respective countries.

We would like to add our thanks to the petitions committee for considering our submission, and if there is any further help or evidence to support the decision making process, we would be honoured to help.

GALAR

16 September 2011