

GALAR Community Volunteer Group

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Attention Petition Committee

Monday, 08 September 2014

Dear Sirs,

Reference: Single wind turbine planning petition

This petition was raised because of concerns by the petitioners in respect of the inadequacy of planning legislation regarding single or small groups of wind turbines which are connected to the grid, and exclude those turbines which are for self supply.

The petitioners raised the following issues, on which they felt, the Welsh Assembly Government could legislate to provide:

1. A more open and democratic system of planning, in respect of these turbines.
2. A fairer distribution of costs of implementing the operation of these turbines.
3. A system of removal should the subsidies available to operators be withdrawn or reduced to a point which makes the turbine fiscally unviable.
4. Repair or removal of turbines damaged by extreme weather events.
5. Grid connections and night time operation of turbines.

Item 1 above is requested because of the inadequate public notice of planning applications, and the local citizen's right of consultation on a matter that may substantially affect their domestic or business amenity.

While the present system of allowing individuals or groups to register their opposition, or support, should continue. There should also be available a local time scaled referenda available at local post offices libraries etc. as well as online at local planning offices where an undisclosed opinion can be registered either for or against the application.

Anonymity is required because rural communities are being divided, with threats common from both sides and the farmer and landowner, once admired and at the centre of communities are now ostracised.

This 'vote', or more properly 'public consultation', would then be available to the county council planning department, and planning committees to be taken into account when an application is considered.

Item 2 above is requested because all costs of these turbines are paid for by the electrical consumer, rather than from general taxation. In all respects this is a poll tax demand on a sector of the public whose ability to pay is not taken into account. Fuel poverty in Wales, per capita, is by far the worst in the UK, probably among the worst in Europe.

The grid upgrade costs, as detailed in 5 below, and the subsidy on each energy unit should be met either by the Welsh Assembly Government or the County Councils of Wales. The limited energy generated from these turbines can only be described as for local consumption, if politically councils or the Welsh Assembly Government believe that these turbines are environmentally worthwhile, then they have recourse to tax raising to support their political conviction.

Item 3 above is requested should the Welsh Assembly Government feel that they are not fiscally responsible for Welsh Energy subsidies, and do not agree payment of the subsidies detailed in item 2. We request that should subsidy payment be in the gift of Westminster government, and they withdraw it; then these turbines cannot simply be abandoned, for public safety they must be removed.

Wind Farms operated by Multinational Companies are required to promise removal as part of planning permission; and we request a similar bond is part of planning applications for single turbines.

Because neither an individual farmer, landowner, or agent making the application can be assumed to have the future funding for removing recycling and landfill payments for these turbines, then a charge should be set against the property they are built on.

All the available evidence shows that once the barrier of unacceptability is crossed, multi applications will be made in the same area. There is also a great deal of evidence that both land owners and planning committees are allowing permission based on previous local applications.

This points to an unlimited number of turbines being granted permission and the removal costs becoming a significant threat to local finances.

If the removal of these turbines is a charge on the property on which they are built; it will cover removal costs should the owner, or his estate, sell the property or are unable to meet the removal commitment.

Item 4 above is requested because all the evidence of turbine accidents and failures show that single turbines are far more likely to fail than commercial wind farm turbines. This has been shown to be the result of poor installation because there is no adaptation to meet severe weather events and local environmental conditions.

Both UK Meteorological Research and the IPCC both predict an increase in severe weather events for the immediate and long term future, and full insurance, both for the turbine and third party and collateral damage is required for each turbine.

We ask that turbine operation requires an annual license, administered by the local authority. Issue of that license should require a full insurance and a mechanical and environmental inspection. The administration costs to the local authority to be recouped from the license fee.

Item 5 above is requested because the sheer number of applications which are taking place, without regard to the local rural grids ability to handle intermittent loads is putting rural supplies at risk.

Westminster Government has tried to mitigate this by giving much enhanced subsidies for turbines which are downgraded. Downgrading means the mechanical potential of a turbine is choked back to produce less electricity for which the electrical consumer pays more.

While single turbines feed directly onto the grid, the amount of intermittent energy produced is unknown to the grid. By downgrading and paying more for less the logic is that the amount produced will never embarrass the grid, because the over or undersupply will never reach levels to threaten damage or supply restriction.

This assumes that two objectives are met: Objective 1 is that the number of applications granted will always produce electricity that the grid can absorb, without knowledge of what is currently being produced. Objective 2 is that the production the local grid is capable of handling can absorb the intermittent levels of supply.

This works well in England because local democracy is a far higher factor in planning decisions, than in Wales, so objective 1 is met. Also, even rural grids in England have a

far higher capacity than the Welsh equivalent, so a reduced objective 1 easily meets objective 2.

In Wales the opposite is true and the greatest threat of unrestricted applications is during off peak periods. The Welsh rural grid has a very minimal off peak load, in comparison to its English counterpart; having smaller settlements, little public street lighting, no stores or Supermarkets and a reducing number of pubs and meeting places. To introduce extra capacity at this time means inevitably an unnecessary upgrading of the grid.

This can and should be addressed by limiting single turbines to peak energy only. That the energy is not required is self evident. The energy cost is not reduced for off peak supply, so the consumer is paying an extortionate price for energy they do not want. Energy that contributes nothing to the National grid.

Coincidentally the off peak operation also poses the greatest threat to nocturnal wildlife. Statistics show a decline in nocturnal species, many of which carry EU protection.

Almost all public buildings carry notices on energy saving, commercial enterprises have energy saving committees, our schools teach children to turn lights off when not needed, and the public are urged to not have electrical equipment on back up. Restricting these turbines to peak production is the Welsh Assembly Governments opportunity to metaphorically 'turn the lights off' when we go to bed.

The turbine operator will not suffer from this restriction, turbines, like any other mechanical device have an operational lifetime. So a turbine available to operate 24/7 and with a 20 year operational life has that lifetime extended to 30 years when operated 16/7.

Conclusion

The existing planning does not offer an adequate local community consultation and operation of these turbines fiscally penalises Welsh electrical consumers, and their interests are not considered within the present system. We would ask the Petitions Committee to put these specific points to the Minister. Also in respect to item 5 we would ask the Petitions Committee to take advice from the National Grid to determine if switching off the output from single turbines in off peak periods would threaten the continuity of supply in Wales.

Yours faithfully

GALAR Community Volunteer Group