

# Environment and Sustainability Committee

## Inquiry into Energy Policy and Planning in Wales

EPP 204 - Mochdre Action Group

### Response to Welsh Assembly Environment and Sustainability Committee

#### Considerations

1. What are the implications for Wales if responsibility for consenting major onshore and offshore energy infrastructure projects remains a matter that is reserved by the UK Government?
  2. How does this affect achievement of the Welsh Government's aspirations for various forms of renewable and low carbon energy as set out in the Energy Policy Statement?
  3. How does this affect delivery of the Welsh Government's target for a 3 per cent reduction in Green House Gas emissions per annum from 2011?
  4. What will be the impact if consenting decisions on major infrastructure projects and associated development are not all taken in accordance with Welsh planning policy?
1. Piecemeal approach to developments, with no possible integration of planning considerations. In the case of onshore wind, there is the potential for a vast power station across the whole of central Wales, with no joint consideration of individual applications for turbines and associated infrastructure (refer PPW 12.8.14).
2. At present the UK government's target-led drive for on-shore wind has led to individual applications vastly in excess of Welsh Assembly targets (TAN8), and without the concurrent delivery of other renewable sources less immediately viable.
3. Because of the fluctuating energy output from wind, compensating sources will have to operate intermittently and inefficiently in order to achieve a stable output. In the short term this will be from gas turbines, and there will be no appreciable reduction in greenhouse gas emissions, possibly a resultant increase. The fact that these may be located in England rather than Wales indicates that with an integrated electricity distribution network between England and Wales the consideration of statistics based solely on geographical location in Wales is flawed. The subsidy of inefficient generation by increasing fuel bills has the potential to lead to extensive fuel poverty.
4. There will be no prospect of an integrated approach to energy infrastructure planning. However, there is already so much confusion within the Welsh planning guidance that an integrated and intelligent approach would be unlikely if present Welsh Assembly guidance were to be followed. Welsh policy documents need to be reviewed and clarified, particularly in relation to TAN8 and on-shore wind.

#### Petitions

1. No to TAN8 wind farms and high voltage lines spoiling our communities
  2. Transport of turbines in Mid-Wales
1. TAN8 with its associated documents now contains so much conflicting guidance that there is widespread confusion. For example, in SSA C Newtown South, the original published TAN8 (2005) target was 70MW of capacity. The letter from Environment and Sustainable Development Minister John Griffiths (July 2011) quotes the Garrard Hassan target of 98MW as being an upper limit. The Welsh Assembly's spreadsheet "TAN8 Review of Windfarm Developer Interest" (2/8/11) shows 398.8MW. The Assembly's report "SSA Reassessment and Validation" by Ove Arup (July 2010) suggests an installed capacity of approximately 300MW by 2020 (Figure 4.1) and an additional capacity of up to 565.5MW depending on the separation distance from dwellings (Table 5.2). When a minister refers to the "TAN8 targets", no-one can know which he is referring to. If TAN8 itself is not to be reviewed, clarification could be achieved by an annexe updating it, which should set upper limits not only on capacity, but also on turbine height, SSA areas and separation distances from dwellings.
2. Transport implications need to be included in the integrated planning process referred to above (PPW 12.8.14)

*Mike Brennan 17/9/11*