

Environment and Sustainability Committee

Inquiry into Energy Policy and Planning in Wales

EPP 3 – Judith Stretton

Dear Clerk of the Committee

Energy Policy and Planning in Wales

There are two vitally important issues that very few people in Government, in either Wales or England, seem to be considering in the race to cover a large part of Mid Wales with enormous wind farms.

Flooding

The area in question, the ‘Strategic Search Areas B & C (Carno North and Newtown South)’ serves a vitally important role as water catchment area for the Rivers Severn, Dyfi and to a lesser degree, the Wye. This role has already been compromised by compaction from intensive farming and overgrazing and widespread planting of forestry, increasing the flood risk downstream. **But this will be as nothing compared to the effects from covering the Montgomeryshire uplands with concrete and other impermeable surfaces.** Enormous quantities of concrete will be required to anchor the hundreds of proposed huge turbines, together with the bases for ancillary buildings, a massive electricity substation and associated pylons. Impermeable surfaces in the form of hundreds of miles of tracks, across the uplands and linking turbines, and the associated extensive road works to allow access to the area for the turbine components and enormous transformers, etc. will inevitably increase the potential for faster run-off.

In many parts of England, homeowners now have to apply for planning permission to lay impermeable surfaces, such as paving, in recognition of their role in increasing the speed of rainwater run-off. **What is planned for Montgomeryshire equates to permanently concreting over a vital water catchment area!** This could massively increase the flood risk to Mid Wales and bordering English counties.

Non-governmental organisations, such as The Wildlife Trusts and RSPB recognised the value and importance of the uplands in mitigating flood risk some years ago and have many projects in place, such as The Wildlife Trusts ‘A Living Landscape,’ with initiatives all over Britain, and including The Pumlumon Project in Montgomeryshire, and the RSPB’s Life Project around Lake Vyrnwy. The Centre for Alternative Technology states in its journal, ‘Clean Slate,’ (Summer 2010) *‘soil is crucial to water storage and transportation. Enough water for 1,000 people for one year can be stored and filtered by just one hectare of soil. We are dependent on well- managed soils to soak up rainwater, reducing run-off and lowering the risk of flooding.’*

Carbon sequestration.

The other, apparently unconsidered, issue is the present value of the uplands for their carbon sequestration. Forestry Commission figures show that peat-lands (2m deep) are by far the largest carbon store, at a rate of 8000 tonnes per hectare, with heath, moor and scrub locking up 2400 tonnes (compared to 1588 tonnes for semi-natural woodland). **The uplands here are a combination of these habitat types and thus have immense current value as a ‘carbon sink.’**

Morgan Parry, former Director of WWF Cymru, now Chairman of the Countryside Council for Wales, stated in his article, ‘Valuing Nature,’ Natur Cymru, Autumn 2008, *‘Ensuring ecosystem resilience (particularly of those systems that are major carbon sinks) is every bit as important as reducing carbon emissions.’ He also says ‘Research suggests that our woodlands are worth hundreds of pounds per hectare per annum just as carbon sinks,’* (with the Forestry Commission figures above therefore suggesting a much greater value for peat, moor, heath etc) *‘and our wetlands a similar amount as watershed protection.’*

EU Directive 2001/77/EC, on the promotion of electricity from renewable energy sources states, in Article 3, that it **‘must be in proportion to the objective to be attained.’**

Policy.

Policy E3 of The Powys Unitary Development Plan states that *‘proposals for wind farms will generally be accepted providing that they do not result in a significant adverse environmental, social or economic impact.’*

Along with many other people in Montgomeryshire, I feel that the current proposals fail on all three counts.

1. Environmental. In addition to the value of the uplands of Montgomeryshire as carbon sink and water catchment, as outlined above, construction of wind farms on the scale proposed would cause the widespread destruction of habitats and species (many of importance at national and international level) in an area worthy of designation as a National Park.

2. Social. The lives of people here will be totally disrupted for many years to come, initially by the very extensive road works necessary to allow access for hundreds of thousands of heavy goods vehicles, to a very rural community. This fact has been recognised, to some degree, in the Welsh Assembly Government’s ‘Transport and Strategic Regeneration Study, Oct.08 – Powys Wind Farms – Access Routes:

The potential for delay to road users and disruption to communities along the wind turbine delivery routes cannot be over-emphasised. WAG’s policy of developing wind energy infrastructure in Mid Wales, forming part of Central Government’s renewable energy policy, will inevitably strain the highway network and the patience of residents. The disruption caused is likely to lead to impact on the local economy for a number of years. Concerned residents living close to the wind farm sites or along the delivery routes may feel that Government policy is being imposed upon them, and demonstrations against the developments may result.’

The existing road network in the area is totally inadequate even to cope with diversions from road works, being composed almost completely of unclassified, and largely single-track roads, with very few 'A' and 'B' roads.

The massive increase in traffic would also further compromise access to the emergency services, in an area already severely disadvantaged due to its very rural nature.

3. Economic. The major business in the area is farming, but the major revenue earner is tourism. Traffic flows and delays are already considerable during holiday periods and at weekends, and tourists will just go elsewhere when faced with the chaos that would ensue from major road works and a huge increase in heavy goods traffic – Montgomeryshire could become a complete 'no-go' area.

In addition, many people living along the proposed transportation routes are concerned about the impact of HGV traffic on their properties; physically, and on their value, and also from increased noise levels (the EC's 'The Directive on Environmental Noise, June 2002,' has, as one of four objectives; '*Addressing local noise issues by requiring competent authorities to draw up action plans to reduce noise where necessary and maintain environmental noise quality where it is good*')

My understanding is that many of the issues outlined above were not considered when the Tan 8 document was drawn up and I would like to suggest that at the very least, members of the Environment and Sustainability Committee should pay a visit this area to experience the issues for themselves.

In addition, Government effort, in Wales and in England, would be far better directed to halting the current disgraceful wastage of energy: '*a third of energy generated is wasted through poor insulation*' Darren Johnson, Green Party, reported in BBC Wildlife, March 2010. We need to upgrade our building stock to the highest possible energy efficiency, and encourage take-up of micro-generation such as solar thermal, solar voltaic and hydro, in addition to small, local wind turbines. This would create large numbers of jobs all over Britain too, sorely needed in these difficult times of cutbacks and job losses.

Yours faithfully

Judith K Stretton