

## Environment and Sustainability Committee

Inquiry into Energy Policy and Planning in Wales

EPP 200 - Grwp Blaengwen.

September 20<sup>th</sup> 2011

Environment and Sustainability Committee,

National Assembly for Wales,

Cardiff, CF99 1NA.

Dear Members,

I'm writing on behalf a group in Gwyddgrug, Carmarthenshire, asking you to order a review of TAN 8, or to undertake such a review yourselves. In the meantime the TAN should be suspended. It's clearly out of date and cannot bear the weight of reliance currently placed on it.

Please find attached documents which support our request. The first is a copy of a letter dated December 2009, from Environment Minister Jane Davidson to Rhodri Glyn Thomas, AM for this constituency. The letter includes an undertaking to review TAN 8, with full public consultation, in 2010. We believe this letter alone, with its reference to the One Wales Agreement, should be sufficient to convince members that a review of TAN 8 is overdue, and that, until the review is published, Welsh government undertakings on energy and environment matters lack credibility.

Also attached are two of five letters written to John Griffiths AM, Minister for the Environment and Planning. They both refer to urgent matters implicit in TAN 8 which we believe should be clarified before Planning authorities are asked to rule on existing or imminent applications. The most important are

- i) an apparent contradiction between wind turbine policy as stated by the First Minister and that of FCW acting as agents for Welsh Ministers and
- ii) *the fact that local people in Gwyddgrug, or others who have come to know what is happening, can have no confidence in the planning, investigative or remedial procedures for wind turbine noise.*

Below we have worked through TAN 8 paragraph by paragraph. These two most urgent matters come under paragraphs **2.5 of the main document** and **2.14 of Annex C**. The map, statements from turbine neighbours and copy of a letter to Carmarthenshire planners go with our submission on the latter.

We are a group of 46 mostly Gwyddgrug, Carmarthenshire, residents. Since 2007 we have

monitored the existing Statkraft/Alltwalis turbines and current applications for many more nearby. We believe it is the responsibility of the Assembly and its governments to develop and increase the amount of Forestry Commission land in the most sustainable, environmentally friendly and carbon-emissions-saving ways possible. We believe the current emphasis on industrial wind turbines on farm and forestry land near homes encourages broadly un-sustainable development and ask the committee urgently to consider this serious question. There is a lack of clarity over responsibilities for monitoring carbon emissions in relation to the turbine program. We are concerned about mitigation for loss of woodland, and oppose the idea that mitigation for a development in, say, Carmarthenshire could be anywhere in Wales.

TAN 8 was published in 2005, and the SSAs outlined in 2004. Research for this was even earlier. That means the current TAN 8 is based in research done nearly a decade ago, when the balance of available renewables technologies and understanding of the need for carbon storage and afforestation were very different: and when no feed-in tariffs, to encourage smaller installations, were available.

We hope the committee will seriously consider our necessarily detailed submission. Our chairman would like to address the committee and answer any questions and would perhaps be accompanied by a few members on such an occasion.

Again we ask you to order a review of TAN 8, or to undertake such a review yourselves.

Yours faithfully,

Janet Dubé,

Grwp Blaengwen.

**Grwp Blaengwen submission on TAN 8 to the Environment and Sustainability Committee,**

**National Assembly for Wales, September 2011.**

In the paragraph 1.1 of the **Introduction** to TAN 8, the document says that it should be *taken into account by local planning authorities in.... unitary development plans*. TAN 8 2005 should have been at least updated in time for UDPs drawn up in 2011.

**Paragraph 1.4** refers to targets for energy from renewables to be achieved by 2010 as well as by 2020. A current TAN should not refer to target dates that have passed.

**Paragraph 2.5** refers to indicative targets for SSAs. Since the Assembly elections this year, the First Minister has indicated that his government would like these indicative targets to be taken as upper limits, and that planning authorities should respect this. In the case of SSA Brechfa Forest and land adjoining this, existing turbines and applications\* already before Carmarthenshire exceed the indicative capacity (90MW) by more than 10%: and yet RWE has already consulted on an imminent application to the IPC for a further 84 MW capacity in the same SSA on Forestry Commission land (Brechfa Forest West). There is an evident contradiction between wind turbine policy as stated by the First Minister and that of FCW acting as agents for Welsh Ministers. We wrote to Mr Griffiths, that .... *it's difficult to see how the three applications, for Brechfa Forest East and Bryn Llewelyn, already submitted, and for Brechfa Forest West, imminent, could be considered concurrently, by different decision makers, and still ensure that the Welsh government's current policy on capacities in SSAs is respected*. The fact that the application for the greatest capacity, 84 MW, is promised by RWE for land ( at Brechfa Forest West) held by FCW acting as agents for Welsh Ministers adds to the difficulty. This application should be postponed and TAN 8 suspended until the policies are clarified and clearly compatible.

\* RES application for Bryn Llywelyn, Llanllwni and RWE application for Brechfa Forest East.

**Paragraph 2.9** says that SSAs are *generally sparsely populated*. Is it this that suggests that the Assembly considers people who do live in SSAs, near actual and proposed turbines, obstacles to development? This should be clarified in a revised TAN. **Paragraph 2.9** also says that land in SSAs has a *general absence of nature conservation... designations*: yet in reality biodiversity is seamless and all wildlife habitats are valuable. Government and other publications and policies since 2005 make 2.9 seem an outdated approach.

**Paragraph 5.1** says that *the local implications of TAN 8 should be incorporated into LDPs.....* While there is confusion between 'indicative targets' and upper limits, mentioned above, it's impossible, in preparing 2011 LDPs, to know exactly what the local implications are.

**Annex A Paragraph 7**, says *the Welsh government propose(s) that 800 MW of... requirement will come from onshore wind turbines.....* in the form of developments over 25

MW capacity. The indicative capacities for SSAs in Paragraph 2.5 total 1120 MW, nearly 40% more than 800MW. This shows that confusion over targets was written into TAN 8 in 2005 and can only be settled by suspending and reviewing the TAN.

**Annex B paragraph 2.4** says that community benefits associated with wind turbine developments are provided by the developer *on a purely voluntary basis*: **paragraph 2.3** says that .... *part of any annual payment should be invested in carbon emissions reduction measures in the local community*. This would be a good idea, if it were part of a policy, but since these payments are voluntary, neither the local planning authority nor the Assembly has any control over how "community benefits" are used. Our experience in Gwyddgrug is that

i) generally, those community members who pay the heaviest price for the introduction of industrial turbines nearby, are not the ones who receive community benefits.

ii) in the absence of direct statutory local authority or Assembly involvement in community benefit schemes, the developer has undue influence over community affairs, thus undermining statutory authorities and weakening democracy.

In association with Welsh county and community councils, a revised TAN should indicate a means of promoting community benefit schemes that prioritise local carbon emissions reduction measures, in democratically accountable ways.

**Annex C Paragraph 2.1** appears to contain a mistake: surely most wind turbines installed in 2005 and 2011 rotate about vertical, not horizontal axes?

**Figure 1** was already out of date in 2005: turbines already under consideration in Wales had greater capacities than 2 MW and since then, proposals are for taller turbines with greater capacities. An out of date drawing makes the document look quaint: the reality is far from quaint.

**Paragraph 2.11- 3** was never a sufficient expression of the implications and complexities of introducing electricity from rural industrial wind turbines erratically into a Grid which mainly supplies urban areas. The policy and guidance should be clarified.

**Paragraphs 2.35- 2.38** did not give sufficient guidance to LPAs or instructions to developers on how to avoid difficulties with the MOD. Would-be developers in relevant areas should be told that, without evidence of an ongoing, site-specific written contract between themselves and the MoD, applications will be refused. LPAs should be told to ask for such contracts, rather than having to try and enforce consultation between developer & MoD.

**Paragraph 2.36** is out of date. Partly because of what happened in relation to the MOD and the Statkraft turbines at Blaengwen, Gwyddgrug/Alltwalis the MOD has changed its policy and requires lights in other circumstances than those mentioned.

**Paragraph 2.9** says that *anemometer masts are needed.....post-construction in order to provide control information*: but developers are not required to keep or provide them. We

believe that an anemometer or weather mast on the Statkraft/Alltwalis site above Gwyddgrug would provide valuable information to be set against turbine neighbours' experience of noise intrusion ( see below) and might be a valuable tool in moderating the operation of the turbines according to weather conditions, to protect the sleep of turbine neighbours. Should the maintenance of such a mast be a planning condition? TAN 8 is not clear on this.

**Paragraphs 2.14-2.16 refer to wind turbine noise. *This matter is the most obvious one on which Welsh wind turbine policy should depart from UK policy, which should have been revised by the previous UK government, or by this one.***

When the Statkraft wind turbines above Gwyddgrug, now known as Alltwalis wind farm, came before Carmarthenshire County Council in March 2007, there were reports in the press that noise from wind turbines can drive people from their homes. Those reports came from England, but this also happened to a family living near the three Blaenbowi turbines in Carmarthenshire. Knowing of such things inevitably caused anxiety in people living near the proposed turbines, but they were assured that planning conditions provided sufficient protection. Since the turbines became operational in October 2009, it is clear that this is not the case.

Those households who suffer intrusion, sleep disturbance and loss of amenity from Statkraft wind turbine noise are now faced with three more applications for wind turbines locally, one for 28 turbines surrounding the present 10 problematic ones, and one for a development next to the existing one. Please find attached:

- i) a map made last year showing households suffering noise disturbance, the existing Statkraft/ Alltwalis turbines and the 28 proposed FWC/RWE Brechfa Forest West turbines. This doesn't include the proposed Bryn Llywelyn turbines, which also cause anxiety to those already suffering noise-intrusion.
- ii) noise statements made last year by some group members, showing some of the problems, and one from one of the most severely affected, written this summer, which show that after more than 18 months, the problems are not sorted;
- iii) a copy of a submission made to Carmarthenshire County Council in relation to the application by RES for wind turbines above Llanllwni.

In letters to the current Welsh Minister for the Environment and Planning we have written that .... *local people in Gwyddgrug, or others who have come to know what is happening, can have no confidence in the planning, investigative or remedial procedures for wind turbine noise.*

*... continuing problems, and the fraught, erratic relationship between the developers and some complainants, reveal that current investigative and remedial measures available when noise problems do arise, are inadequate. There is a need for agreement on how noise problems should be studied and solved when they arise, and for the community neighbouring any proposed new turbines to have confidence in that agreement*

Our letters have been replied to by civil servants with energy, rather than environment, sustainability or planning remits. Who is responsible for Welsh government planning policy on wind turbines? Can they ensure that wind turbine neighbours are adequately protected against noise intrusion, sleep disturbance and loss of amenity? If local people are not adequately protected, how should they seek redress? The Noise section of TAN 8 should be suspended immediately and replaced with Planning Guidance that protects people in a way that they are entitled to expect from statutory and elected bodies charged with their protection.

**Annex D 3.4** gives 500m as a 'typical' distance between homes and wind turbines, without any reference to the height or capacity of turbines and whether, for example, bigger turbines should be further away from homes. The paragraph does not give planning authorities appropriate guidance in protecting turbine neighbours from noise intrusion.

Carmarthenshire's 2011 draft Unitary Development Plan includes a recommendation that turbines should not be approved within 1.5 K of neighbouring homes. We have written to the authority saying Gwyddgrug experience shows this is not enough.

**Annex D** re-inforces a widely held, but we believe wrong, view that the most important 'nuisance' of industrial wind turbines is the visual one. The Annex is an encouragement to developers and planning authorities to pay great attention to the appearance of turbines and scant regard to their other effects, which can blight peoples' lives.

**List of documents in support of Grŵp Blaengwen submission on TAN 8  
September 2011.**

- 1. copy of letter from Jane Davidson AM to Rhodri Glyn Thomas AM**
- 2 & 3. Copies of letters from Grŵp Blaengwen to John Griffiths AM**
- 4. Map showing turbine -noise affected homes in Gwyddgrug with existing and proposed turbines adjacent to these.**
- 5. extract from letter from Grŵp member, July 2011.**
- 6,7,8,9,10: statements from noise complainants, 2010.**
- 11. copy of letter to Carmarthenshire planning officer Richard Jones, re turbine noise and current application, February 2011.**

### **Turbine noise statement March 2010.**

Malcolm moved here in 1967 when he was 15, his father and grandfather were already farming here. He is the fourth generation of his family and Marc the fifth to live and farm here. It is a mixed livestock farm

We weren't told by the council that the turbines were coming. There had been rumours for many years. We went to objectors meetings in 2007 and 2008. In October 2008 we began to hear the noises of the roller and vibrator making the new track by Bedwhirion. We first thought the noise was in the house, the Rayburn was vibrating and we thought there was something wrong with that, but it was the contractors' machines. The vibration rattled the plates on the dresser and sometimes caused them to fall & break. Sometimes we couldn't stay in the house it was so bad.

These noises lasted for several months, we tried to complain but didn't get anywhere. As the track got higher the noises went further away.

We can see (all) the turbines from our front windows. They are ugly and horrible. We first noticed the turbine noise in October 2009. It can be there in the daytime, in the house, the yard or on the fields. It comes again in the evenings as the road traffic slows down, and gets bad towards 10 o'clock at night. It can come in the middle of the night and wake us up. Then we can't get back to sleep, Ann is a poor sleeper anyway. We get up early and are tired next day. We've been woken up at least half a dozen times.

When it's there it's a constant irritation, like a train that doesn't pass, you can't shut it out. We try not to look at the turbines, that is hard, they are a strain, but you can't shut your ears. When the noise isn't there you never know when it will come back or how bad it will be.

We filled in the forms from the council and went to the meetings. We asked for a noise measuring machine but there weren't enough. There is one now in the field. We don't have confidence that the council is sorting this out. When Statkraft said they had altered the turbines, it doesn't seem to have made any difference. The sight of the turbines is awful, we sometimes have flicker or glare but the noise is the worst thing.

We dread more turbines coming, we will be able to see them, maybe they will make the noise worse? We want and expect this noise problem to be sorted out before more turbines are planned nearby. We want our lives to be as they were before, so that Malcolm can pass on to Marc what was passed to him.

### **Verona and John Evans**

#### **Turbine Noise Statement March 2010**

We have lived in Veindre Parc for most of our lives. Verona for 58 years, John for 38 years. We are living beside a main busy road between Carmarthen and Lampeter with heavy traffic but have had no trouble with the noise. The cars etc. pass by and the noise goes with them but the noise of the turbines can be with us for hours, intruding on our lives and keeping us awake at night. As both of us are out at work during daytime it is very difficult to cope if we have been kept awake during the night with the hum and turning of turbines.



Visitors calling wonder what's the noise they can hear. As we comment "it can be much worse." They then ask did you have noise interference before the turbines, and the answer is no, if not why should you have to put up with it now.

When we heard there was planning in for a wind farm at Blaengwen I (Verona) was very concerned but John was not bothered beforehand as he thought they would be out of the way but he never expected them to be noisy. The noise does bother us.

We have noise monitoring machine in the house and one outside. They collect data from both machines every 4-6 weeks. When we hear the noise we have to press a button on the indoor machine which records the noise for 5 minutes. The problem with that is as we are out working during the day we have not been able to record daytime noise that often. Below are some examples of the noise we have noted

On **28<sup>th</sup> October 2009** approximately 1.30am we were woken up with a noise in our bedroom. It was a turning noise as if someone was turning a big wheel. We were unable to go back to sleep so we had to turn the radio on to drown the noise and eventually got little sleep. As we both work, before we knew it was time to get up and lack of sleep can interfere with our daily work especially the type of work both do.

On **29<sup>th</sup> October 2009** watching TV at approximately 9 p.m.in the lounge at the front of the house and the noise of the turning turbines was coming through the double glazed windows and we had to turn the TV louder to drown the noise. This went on until early hours of the morning. The distant hum was with us at 9.00a.m.

**30<sup>th</sup> October 2010** – I had a day off work so was up early. When walking to the garage I could here the noise of the turning turbines. I could here the noise. Around 2 p.m. I was out doing a bit of tidying in the garden and the noise was as if an aeroplane was hovering above, that went on until approximately 4 o'clock and by that time I had a fuzzy head. Around 10.30p.m. when going to bed, opened the front door to check and the noise was still there in the distance.

**22<sup>nd</sup> November** morning – Noise as if a steam train was trying to build up steam to leave a station and was stuck in the same place unable to move. Very annoying.

**24<sup>th</sup> November** – got woken up around 4 a.m. unable to go back to sleep so had to get up to make a cup of tea to try and take you mind off the noise. Unable to go back to sleep and was extremely tired the following day and having to do a day's work.

Same as above on **30<sup>th</sup> November** but was woken up around 5 o'clock and same again down to the kitchen to make a cup of tea

**1<sup>st</sup> December** as above but was woken up around 6 a.m. with the sound of roaring turbines. Got up then (earlier than usual) and the noise was still with us until around 2.00p.m. We could still here a distant hum around 11.50 when going to bed.

**4<sup>th</sup> December** around 8.30 p.m. was watching TV in the front lounge and the noise was again coming through the double glazing and we had to turn the TV louder. We could even hear the

noise in the back kitchen. Opened the front door on the way to bed around 10.45 p.m and the noise was so loud it was making your head spin.

E mail Rob Fellows Director of Quatro and our Councillor Linda Davies-Evans.

Radio on to drown the noise yet again.

**5<sup>th</sup> December** 1.30p.m turning noise was very loud so I rang Councillor Linda Davies-Evans to ask her to come down to hear the noise for herself. By the time she arrived the noise was not as bad as at 1.30 p.m.

**Above were only examples and according to others who can see them that on some days it might be only be only 6 or even less turning.**

Over the Christmas period it was peaceful, as we were told that they had been turned down and then the big freeze came and they were on stop.

Visual impact on our property is minimal as the trees seem to shelter them. We are able to see one from the front door.

Another issue is in the spring and summer we leave our doors and windows open, even in the summer we sleep with windows open unless the noise is stopped we will be deprived of having the doors and windows open.

Before the turbines came the surrounding countryside was peaceful and it was a pleasure to sit or work in the garden but what we have experienced during the last 5 months has demolished the peace.

The level of noise should be the same now with the turbines as what it was before.

Half a mile up the road we have noticed people pulling in to listen and look at the turbines. We know of people who are concerned but are too scared to attend meetings or complain their as they do not want to upset the landowners.

People are being forced to put their property on the market to escape from the noise. Another question is whether they will be able to sell as depreciation is a major factor at present.

Furthermore there are meetings going on at present to try and get planning for 40 more turbines more or less behind the present ones. We are sure that no such planning should be given until the noise problem has not been sorted on the 10 existing turbines.

Yes it was a happy friendly community but I am sorry to say that the windfarm and the noise issue has torn the community apart.

**Letter from Grwp Blaengwen member, July 24<sup>th</sup> 2011.**

**..... I have identified the noise that disturbs my sleep, I have made phone calls to Rheidol complaining that I am being kept awake, and Statkraft will have the data for rainfall, wind speed and direction, and turbine operation for those specific dates and times. As I do not phone in the middle of the night unless I am awake, and do not phone just when I can hear the turbines but ONLY when I am reaching the end of my tether from being kept awake, it doesn't seem unreasonable to me for someone to correlate this data and attempt to identify the conditions that produce the noise nuisance (statutory or not!). Then find a solution e.g. the software we have been told is available to turn off turbines in prevailing conditions!!**

For information, since beginning of February I was kept awake on the following nights:

7th and 8th Feb, 14th Feb, 16th and 17th Feb, 20th and 21st Feb

Since the CCC letter of 9th March I have phoned Rheidol on the following occasions:

29th March - phoned Rheidol 02:01am

(I had an ear infection from 31st March for 3 weeks and was almost totally deaf so was undisturbed, though I know neighbours were disturbed during that period of time)

4th May - phoned Rheidol 01:22am

5th May - tried to sleep in my son's bedroom as he was on night shift

6th, 7th, 8th May - resulting in 6 sleepless nights in a row - phoned Rheidol to complain

Turbines were off from 9th May to 14th May

21st May - phoned Rheidol 02:50 am and 11:04 am

Turbines were off again from 9th June to 16th June

26th June - phoned Rheidol 08:30 am after sleepless night

Turbines were off again from 28th to 30th June

4th July - phoned Rheidol 11:15pm - noise went on all night - didn't phone again as had an early start and a long drive.

Which leads me to one final point - I am uncomfortable about my sleep deprivation and driving. Sometimes I have to drive to Bedford, Hampshire, Wiltshire, Essex, or Devon and require a good night's sleep beforehand. I shouldn't be forced into a situation where I have to drive tired even to my office in Carmarthen, but I can't just tell my employer that I'm too tired to come to work! I sometimes have to sleep in my car in the car-park for my lunch break and ask colleagues to come and wake me up in case my phone alarm doesn't wake me.

If this was to be for just a few months then may be it would be acceptable - but surely not for the next 25 years!