The countryside charity
Shropshire

CPRE Shropshire
[redacted]
admin@cpreshropshire.org.uk
www.cpreshropshire.org.uk

President: Robin Thompson CBE, DL : Chair: Sarah Bury DL

NDF Team, Planning Policy Branch
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

15 November 2019

By email only to: ndf@gov.wales

Dear NDF team

Welsh Government National Development Framework Consultation extended to 15th November 2019

Introduction

1. CPRE Shropshire is one of the groups making up "The Alliance", which took part in the Mid Wales Windfarms Conjoined Public Inquiry (CPI). Although that CPI finished sitting on 30 May 2014, a final decision on two of the windfarms involved has yet to be announced.

2. It was apparent that the windfarms involved in the CPI, and others in Powys, were useless as generators without the ability to export their power to the National Grid in England. The windfarms/generators, and a grid connection enabling their electricity to be used, were all one intimately connected project.

3. CPRE Shropshire is therefore well aware that development proposals emanating from Wales have the potential to have profound effects on neighbouring areas outside Wales, and is therefore making this response to the present consultation.

4. For the above reason CPRE Shropshire is primarily concerned with Policies 10 to 13 on pages 38 to 40 in the Consultation Draft and with question 7 on page 15 of the Consultation Document/questionnaire.

5. Our answer to question 7 is that we **strongly disagree** with the draft NDF's policies to lower carbon emissions in Wales using large scale wind and solar developments. Our reasons on this and other points are set out in the following sections of this response.

Consultation

6. The Gunning Principles of consultation lay out that:

   - Consultation must take place when the proposal is still at a formative stage
   - Sufficient reasons must be put forward for the proposal to allow for intelligent consideration and response
   - Adequate time must be given for consideration and response
   - The product of consultation must be conscientiously taken into account.

7. It is noted that the consultation period was extended by a fortnight because of initially confusing and omitted documentation. We were obliged to draw up our own catalogue of the documents that appear to have been produced specifically for the NDF process, because of the confusing nature of the presentation of the supporting evidence for this consultation. It is disappointing that the documentation was deficient in this way.

8. Although the effects of the proposals in the draft NDF will affect regions other than Wales there is doubt as to whether WG has formally contacted authorities likely to experience those effects. For instance, our contacts at the highest level within Shropshire Council's planning team had no record of any contact from WG a month after the launch of this consultation. We ourselves became aware of it by virtue of having contacts living in Wales, rather than via any cross-border publicity undertaken by WG.

9. In view of the fact that, as outlined below, we consider that inadequate reasons have been put forward within the draft NDF to support the policies proposed, we trust that your Strategic Research and Insight Team will conscientiously give due weight to our arguments.

Climate emergency and renewable energy

10. As stated on page 15 of the draft NDF:

    Climate change and the decline in biodiversity are global challenges and the biggest issues faced by our nation.

    These are global issues, not just those facing Wales (which is in fact acknowledged earlier, on page 4 of the draft NDF, at least as far as climate change is concerned).

11. It disappointing therefore that no figures appear to have been put forward as to:

    a) what the present levels of greenhouse gas (GHG) emissions are within Wales, or how each of the policies proposed will affect them; or

    b) how these figures for Wales fit into the global picture.

12. Without such figures it is impossible to give *"intelligent consideration and response"* to any of the draft NDF proposals, let alone those for renewable energy. Wales is not an isolated entity, and WG policies should take into account a wider perspective than just Wales.

13. If the Welsh Government really is serious about addressing Climate Change then it needs to have made some realistic calculations as to the effect of its policies, rather than having the vacuous hope that inchoate policies might be doing some good. Mark Drakeford said in a radio interview some months ago that Boris Johnson's plans constituted *"vacuous optimism"*. Without some proper calculations then the same can be said of WG's plans within the draft NDF.

14. This is particularly so, as far as Climate Change is concerned, in connection with draft policy 32, which proposes a near doubling of the capacity of Cardiff airport by 2040.

15. Air transport is one of the worst offenders as far as GHG emissions are concerned. It is therefore a puzzle why the WG are promoting expansion of Cardiff airport whilst at the same time declaring a Climate Emergency.

16. The impression is left that they are trading off these airport expansion plans, which are likely to severely increase Wales's GHG emissions, against their Renewable Energy proposals for rural Wales, which in the view of Russell George, AM for Montgomeryshire, will trash the Welsh countryside.

Renewable energy assessment

17. As noted above, the Renewable Energy assessment, carried out mainly by Arup, does not set out detailed calculations of potential reductions in GHG emissions, nor their context in overall global terms.

18. Nor is there any clear statement of current and projected electricity generation and consumption. The assessment ignores the fact that Wales is a net exporter of electricity; it fails to quantify the level of additional output required to reach its Climate Change targets; and it fails to quantify the additional output likely to arise from the proposed policy of Energy Priority areas.

19. It cannot have escaped the WG's notice that the UK Government favours off-shore wind over on-shore wind. Yet we are told that this draft NDF is a land-based land use plan only, and that marine uses are to be separately considered.

20. It is nonsense not to consider off-shore wind and tidal generation potential as part of the overall renewable energy policy package, rather than concentrating only on on-shore wind and solar power.

21. Draft Policy 10 for Wind and Solar Energy in Priority Areas proposes that *"there is a presumption in favour of development for these schemes and an associated acceptance of landscape change"*. This is the aspect of draft policy with which we most strongly disagree.

22. Firstly, the assessment by Arup does not take account of all relevant constraints that ought to apply to the mooted Energy Priority Areas (EPAs). Equivalent assessments were carried out in designating the controversial TAN8 SSAs prior to TAN8's publication in 2005. If similar constraints were applied in both the SSA assessment and the EPA assessment then it might be expected that the SSAs and EPAs would be similar in size and location.

23. However, there is a huge discrepancy in the areas now put forward as EPAs and the areas put forward as SSAs at the time of TAN8, as shown by Arup themselves in their map, which is reproduced in the Appendix to this response.

24. If that huge discrepancy is due to the inclusion in Arup's assessment of areas suitable for solar development then those areas should be identified separately to the areas suitable for on-shore wind development. The planning considerations of permitting solar energy generation are different from those for permitting on-shore wind energy generation. It would help to avoid excessive deliberation at the time of an eventual planning application if there were separate designations of EPAs for solar and EPAs for wind within the draft NPF.

25. Secondly, there is no acceptance by the general public, nor by CPRE or CPRW, that there should be "*an associated acceptance of landscape change".* This seems to have sprung de novo from within WG without any express mandate, and without any justification via Arup's work.

26. During the CPI (referred to in paragraph 1 above) evidence was presented to the Inquiry by The Alliance (ALL-SSAB-POE-04 and ALL-S4-POE-03) that showed that local people were overwhelmingly against both the building of windfarms in Mid Wales, and the inevitable presence of their consequent proposed grid connections.

27. Paragraph 10 above repeats the draft NDF's statement that "*Climate change and the decline in biodiversity are global challenges and the biggest issues faced by our nation*. It is absurd to believe that building windfarms and solar farms will help to save the planet from global warming when the building of them will so disrupt precious habitats that protected wildlife and habitats are put at considerable risk.

28. Also, NRW's internal assessment is that the greatest contributor to GHG emissions amongst the assets under their control is degraded blanket bog. Many of the proposed EPAs cover habitat that includes blanket bog, and development there would therefore tend to degrade that blanket bog. Without the availability of any sorts of calculation (see paragraph 11 above) of these effects, which NRW's assessment implies might be major, it is therefore again absurd to contemplate destroying such precious habitats in the vacuous hope that wind or solar development there might somehow help save the planet.

29. Evidence presented to the UK's Department of Business, Energy and Industrial Strategy (BEIS) in the follow-up to the CPI stated that the precautionary principle suggests that, once

built, the presence of the likely huge massing of industrial moving structures would be alien to endangered bird species whose habit is to patrol a wide territory in search of prey.

30. Furthermore, the activity, noise and tearing up of the landscape associated with construction of wind farms and solar farms, particularly if construction of differing sites overlaps, is likely to cause such birds to avoid the sites, and nearby locations, altogether. Even if construction is banned, by condition, from occurring during the breeding season of the protected birds, the disruption to habitats caused by construction might well be enough to deter birds permanently from visiting the area, or from nesting nearby.

31. Again, our argument is that a much more careful assessment, including GHG emissions calculations, needs to be done in order to assess the balance of inevitable habitat loss against the currently unsupported hope that wind or solar development in EPAs might somehow help save Wales and the planet.

Grid connection

32. As noted above, Wales is already a net exporter of electricity. All the EPAs as proposed would merely increase that export. The fact is that the capacity of the grid within Wales cannot take the extra proposed generation, although that fact is glossed over by Arup and the draft NDF. The extra generated electricity would have to be exported to the national electricity grid network (and then re-imported to Wales if necessary).

33. That is the reason why, at the time of the CPI, National Grid were still actively engaged in furthering their Mid Wales Connection Project, which was *"all about connecting proposed wind farms in Powys to the national electricity network in Shropshire"*. At the same time, Scottish Power Energy Networks had a parallel project to connect Mid Wales windfarms to the proposed sub-station Hub of the National Grid Mid Wales Connection Project.

34. Following the Secretary of State's decision in September 2015, National Grid suspended their work on the project, but that does not alter the fact that the extra capacity proposed by the draft NDF and the EPA proposals would require some connection to the national electricity grid.

35. The problem that this poses is pointed up in the Appendix. This problem is that the EPAs as proposed in mid-Wales are about as far from the national electricity grid as anywhere in the UK. The red arrow indicates the direction, well into England, of the connection proposed by the National Grid Mid Wales Connection Project.

36. During the CPI, reference was made by the Inspector to WG Minister John Griffiths' letter of July 2011 which said, with reference to NG's Mid Wales Connection scheme, *"we do not believe that there is a need for the large, visually intrusive, high voltage grid network infrastructure and associated sub-station of the kind proposed within Mid Wales".*

37. As a result of that statement, a further assessment was undertaken during the CPI of possible 132kV connections on wooden poles, as an alternative to the 50 km long 400kV 50 metre pylon line proposed by NG's Mid Wales Connection scheme. A wooden pole solution was therefore left as the alternative to the pylon solution.

38. The fact remains that:

    a) a connection of some sort to the national electricity grid will be required over a considerable distance from the proposed EPAs in mid-Wales and maybe elsewhere in Wales;

    b) a connection on poles at 132kV will be less efficient electrically and in terms of reducing GHG emissions than one at 400kV on pylons;

    c) the pylons proposal within NG's Mid Wales Connection scheme provoked mass protests on an unprecedented scale.

39. The whole ESA proposals and the consequent necessary grid connection are therefore one indivisible overall project. It is disappointing that there is no mention of this within the draft NDF or the Arup work, and that there is therefore no recognition of the likely effects of these proposals over the border in England.

40. This is doubly disappointing because it is a repeat, and indeed an escalation, of the failings of the TAN8 consultation process.

Tourism

41. Tourism is a hugely important part of the economy of rural Wales. Large numbers of people, possibly the majority, come to Wales because of its remote, rugged and beautiful scenery and landscapes. Rural Wales is not necessarily a place where people come for "visitor experiences" at discrete holiday attractions.

42. The proposals within the draft NDF for ESAs, and the wind and solar developments that they would bring about, would inevitably lead to a large-scale industrialisation of this precious landscape.

43. Just as the draft NDF and Arup's work have not properly assessed the effects of habitat loss on "*the decline in biodiversity*", neither have they properly assessed them for the inevitable decline in tourism.

Local democracy

44. Reference was made above to the previously presented evidence that local people were overwhelmingly against the building of windfarms in Mid Wales, and their consequent grid connections.

45. That also implies that there is no democratic acceptance of the draft NDF dictat that there should be *"an associated acceptance of landscape change"* in connection with the proposals for wind and solar development.

46. It is also a fact that Powys County Council has relatively recently gone through a Local Plan process that experienced some delay whilst a "sound" Renewable Energy policy was worked up. That involved considerable assessment and refinement of proposed wind and solar areas by a firm of professional advisers.

47. The EPAs now proposed by Arup and the draft NDF bear little relationship to the refined Renewable Energy areas that were eventually adopted by Powys CC.

48. The implication is that the WG's draft NDF is paying no account whatsoever of the local democracy enshrined within that Powys CC Local Plan process.

Conclusion

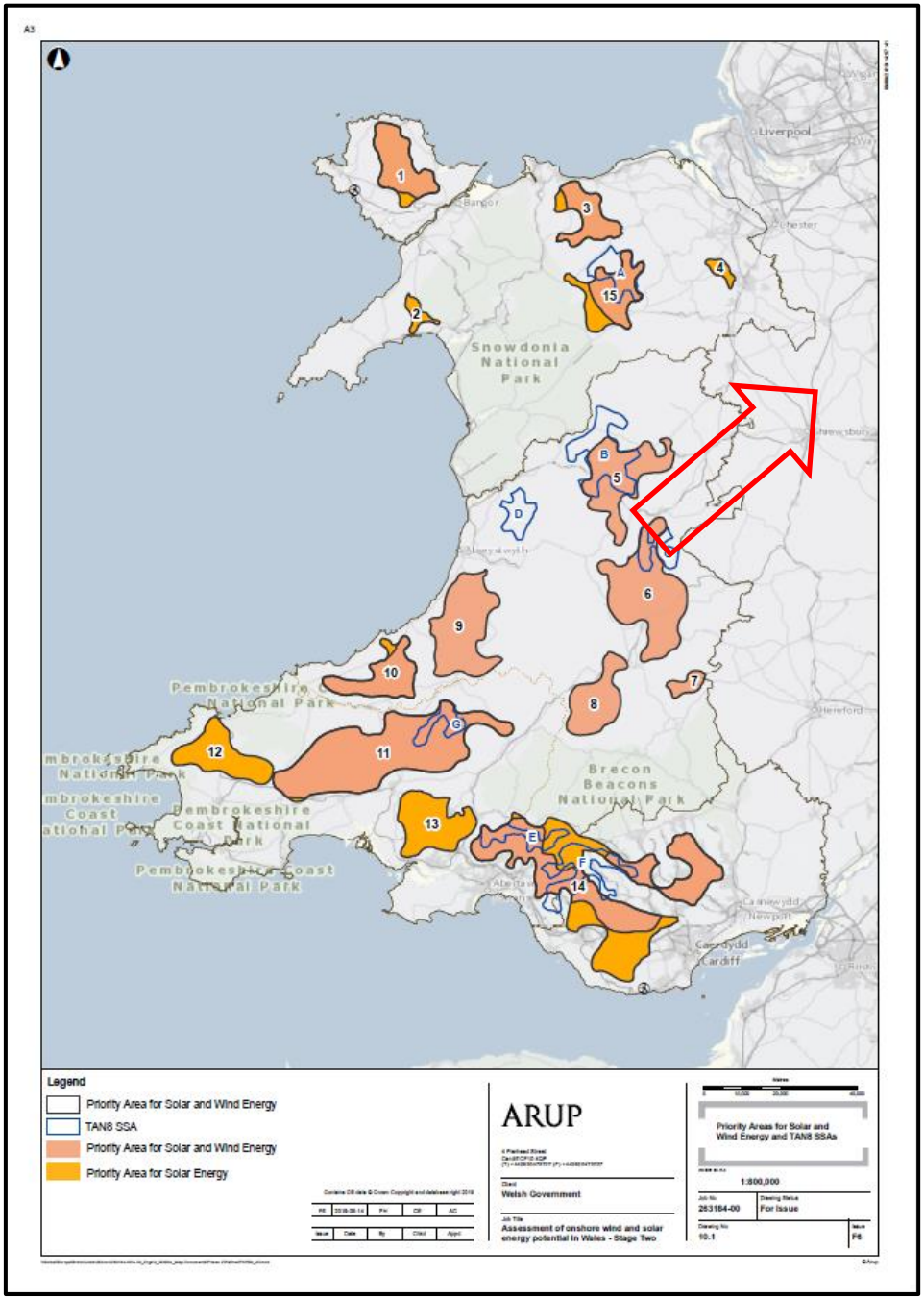
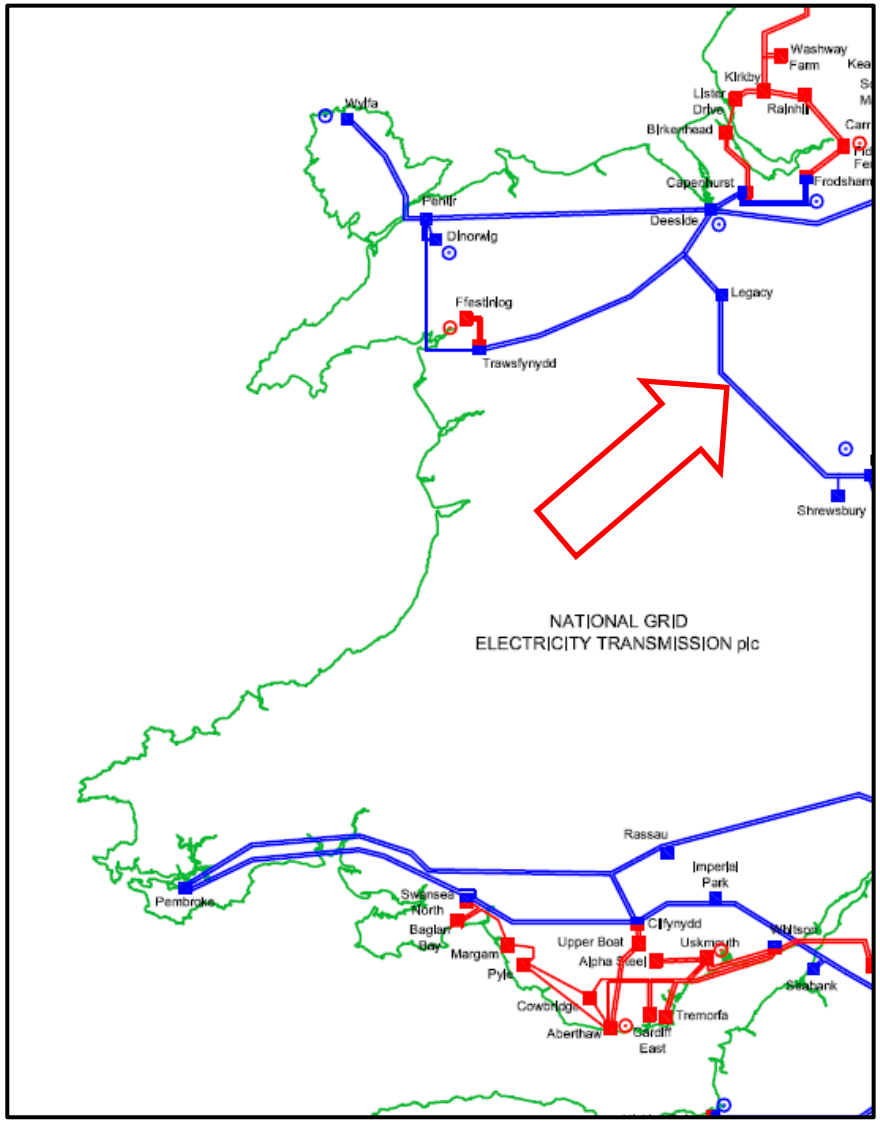
49. As stated at the outset, CPRE Shropshire **strongly disagrees** with the draft NDF's policies to lower carbon emissions in Wales using large scale wind and solar developments, for all of the reasons set out above.

Yours sincerely

C W Green
Planning spokesman
On behalf of CPRE Shropshire Branch

Appendix

Arup's Priority areas for Solar and Wind Energy and TAN8 SSAs



National Grid's electricity transmission system