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1. Introduction

This submission is made by Elgin Energy regarding the consultation on the Draft National Development Framework 2020-2040 (NDF) and in particular NDF Response Form Question 7: Renewable Energy and District Heat Networks (policies 10-15), which asks:

'If you disagree with the NDF's approaches to green infrastructure, renewable energy or district heat networks, what alternative approaches should we consider to help Wales to enhance its biodiversity and transition to a low carbon economy?'

The National Development Framework (NDF) will form part of the development plan, shaping the growth of Wales for current and future generations. The Planning System has a fundamental role in supporting and delivering renewable energy and decarbonising society. It is therefore appropriate that the NDF establishes clear policy to support significant growth in the development of renewable electricity generating facilities. Elgin Energy's response is set out below accordingly.

2. Outline of Position

Elgin Energy disagrees with Policy 10 in terms of the need for designation of PAs for solar and the wording of Policy 11. Elgin Energy believes that the current favourable planning policy for renewable energy development in Planning Policy Wales 10 (PPW) when combined with Policy 12, will provide the appropriate balance of protecting Wales' most valuable landscapes, flexibility to meet challenging climate change targets and encourage the large-scale investment required.

3. About Elgin Energy

Elgin Energy is a leading independent international solar development platform delivering solar projects from origination through the development process. To date they have delivered 21 projects / 230MW across the UK & NI, including the largest solar farms in Scotland (Errol 13MW) and Northern Ireland (Bann Road 46MW). Of that 230MW, four projects / 32MW are in Wales and currently supply enough electricity to power c. 9,500 homes or 12,200 electric vehicles annually.

In July 2019, Elgin Energy obtained planning permission for a 30MW solar project in Blaenau Gwent County Borough through the Developments of National Significance (DNS) process. Elgin Energy is committed to developing projects in Wales. We set out our submission below as an experienced global company in the field of solar renewable energy.

4. About Solar Energy

With some of the highest solar irradiation levels in the UK, Wales is an ideal location for solar projects. Wales can play a major role in the transition to a low carbon economy and the goal of “Net Zero Status.”

The United Nations Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) Global Assessment Report on Biodiversity and Ecosystem Services (May 2019), concluded that nature is declining globally at rates unprecedented in human history, with the rate of species extinctions accelerating and climate destruction being a major issue. BRE (2014) Biodiversity Guidance for Solar Developments (Eds G E Parker and L Greene) states solar farms present an excellent opportunity for biodiversity. Solar therefore presents not only an opportunity to increase energy security and combat climate change but also prevent biodiversity decline.

Both solar and wind can be harnessed to generate renewable electricity. However, they are very different technologies in terms of their form and impacts. For example, large scale solar generally occupies a greater surface area than wind. However, the structures are generally no higher than 3m meaning landscape impacts are localised. Furthermore, large scale solar farms are static and do not result in noise or flicker. Therefore, the two technologies should be considered separately, reflective of their distinct nature and characteristics.

Solar PV is now the fastest deployable, scalable and democratic energy technology in the world.

5. Welsh Government Commitments to Climate Change

The Welsh Government declared a climate emergency in April 2019. Since that time, the government has set out the following ambitious targets for renewable electricity generation as stated in the NDF:

- Wales to generate 70% of its electricity consumption from renewable energy by 2030;
- One gigawatt of renewable energy capacity to be locally owned by 2030;
- New renewable energy projects to have an element of local ownership by 2020;
- Welsh Government has also declared a target of reducing greenhouse gas emissions by 95% by 2050 increasing to ‘net zero’ thereafter. It is within the context of these targets and both past and future energy trends, that our comments regarding the approach to renewable energy in the NDF are offered i.e. to assist Welsh Government in achieving these challenging but admirable goals.

6. Past Electricity Consumption and Generation Trends in Wales

‘Energy Generation in Wales 2018’ estimates that in 2018 50% (7.4 Terawatt hours [TWh]) of Welsh electricity consumption was generated from Welsh renewables. Currently, Wales has a total installed renewable capacity of 3,213MW with 978MW of that being solar PV. In 2018, the total electricity generation of Wales was 30.19TWh with 25% generated by renewable sources.

Progress towards the 70% renewable penetration target has been assisted by the declining Welsh electricity demand (from 17.6 to 14.6TWh between 2005 – 2017) and the rapid decline of coal-fired power stations ahead of the requirement to cease operations by 2025. However, 2018 saw a continuation of the slow renewable energy installation rates for the third consecutive year, adding just 4% capacity compared to 21% in 2016. This trend is likely to continue, with only two solar PV projects achieving consent through the DNS regime since its implementation in 2016.

7. Wales 2030 and Beyond Projections

‘Energy Generation in Wales 2018’ also identified that Wales’ electricity consumption increased, for the first time since 2005, between 2017 and 2018 to 14.9TWh. Using National Grid’s ‘Future Energy Scenarios July 2019’, it is estimated that electricity consumption in Wales will increase by up to 48% (+7.2TWh) by 2050 to 22.1TWh. This major increase is attributed to the anticipated decarbonisation and subsequent electrification of transport and heating. By 2030 Wales’ total electricity consumption, based on an average increase of 0.22TWh per annum, will be 17.6TWh.

Therefore, the 70% renewable electricity penetration target by 2030 equates to a total of 12.32TWh of renewable generation, requiring an additional 4.92TWh of renewable generation to be consented and installed within 10 years. To demonstrate the scale of the task, this equates to installing approximately 160 projects the same size as Wauntysswg (30MW).

The above assessment illustrates the challenges to reaching the 2030 targets. Therefore, policies that would inadvertently and unnecessarily restrict the development of large-scale renewable electricity projects could result in targets being missed. Policy levers should be used to increase capacity from renewable sources as quickly, economically and environmentally-friendly as possible. It is considered the most effective way to achieve this is through a spatial indication of where large scale solar and wind will not be accepted (i.e. as per Policy 12 within National Parks and AONBs) and a clear and favourable site-criteria based national planning policy context outside these locations.

However, we outline below concerns regarding the designation of Priority Areas (PAs) for solar under Policy 10 and the wording of Policy 11 for large scale solar outside PAs as suggested in the draft NDF. Our suggestions of ‘alternative approaches’ are also provided.

8. Policy 10: Wind and Solar Energy in Priority Areas

Whilst Elgin Energy agrees with the NDF’s approach of using large-scale solar to transition to a low-carbon economy it disagrees with Policy 10. The Draft NDF identifies priority areas for solar and wind energy with most located in rural areas. Little explanation is provided on how these PAs were identified within the ‘Welsh Government Priority Areas for Solar and Wind Energy Executive summary stage 1 and 2, July 2019’ background document provided with the NDF. Further consultation on the evidence and reasoning within the full study would provide greater transparency and scrutiny of the approach to solar within Policy 10.

NDF page 36 states that *‘The development of Priority Areas will assist in co-ordinating strategic action, bringing a critical mass of new renewables developments together to build the case for new or reinforced grid infrastructure.’*

Whilst Elgin Energy agrees that new and reinforced grid infrastructure in Wales is a key issue, it is unclear how the above will be facilitated and, if so, when. Grid capacity influences both the scale and location of a development. Building a ‘critical mass of renewables developments’ will only occur once there are committed plans for new or reinforced grid infrastructure. Without a clear strategy for grid upgrades, planning applications will not be submitted. Simultaneously, grid investment is delayed until a sufficient mass of projects are ready to progress. This could significantly limit the ability of PAs to deliver the renewable energy generation targets within the necessary timescales.

Crucially, it is also unclear from the draft NDF and supporting documents whether the development of these PAs will achieve the Welsh Government’s target of 70% by 2030 and presumably 100% by 2050 for net zero greenhouse gas emissions.

It is also unclear if there has been any consideration of “cumulative impact” within the “Priority Areas” i.e. the landscape impact of numerous large-scale projects within a relatively small area. This may be more harmful for the rural communities within the PAs compared to a decentralised approach where projects are dispersed into a much wider environment.

It is Elgin Energy’s view that geographically constraining large-scale solar (defined as 10MW+) may discourage development of large scale projects outside of PAs even if these areas have enhanced environmental credentials and grid connection.

Elgin Energy questions the evidential need for zoning large scale solar. There is significant overlap between the PAs for wind and solar as outlined in the draft NDF. However, there are several differences between what constitutes a suitable site for wind and a suitable site for solar, most notably in terms of the visual impact on the surrounding area. The Zone of Theoretical Visibility for a well-situated solar project is minimal when compared to other forms of electricity generation, thus its impact on the surrounding landscape is minimal. Unlike wind, solar farms can be installed in both rural and urban areas. As the UK Government’s Planning Practice Guidance sets out at Paragraph: 013 (Reference ID: 5-013-20150327):

“The approach to assessing cumulative landscape and visual impact of large scale solar farms is likely to be the same as assessing the impact of wind. However, in the case of ground-mounted solar panels it should be noted that with effective screening and appropriate land topography the area of a zone of visual influence could be zero.”

Therefore, solar energy developments require a much finer, individual and relevant site selection process to progress a suitable and viable project, whilst minimising environmental impacts. It is essential that there is flexibility to deliver suitable large-scale solar sites not confined to the PAs. It is critical that exclusion of solar developments does not occur outside of these areas, particularly in relation to sites that have limited use for housing or social needs with proximity to urban areas.

9. Policy 11: Wind and Solar Energy Outside of Priority Areas

It is unclear whether development within the PAs alone would achieve the ambitious targets set by Welsh Government in respect of renewable electricity generation or greenhouse gases. Therefore, the flexibility to permit large scale renewables outside of the PAs must be retained.

While Policy 11 does not preclude large scale solar outside of the PAs, under its proposed wording in order to secure planning permission a project's application must demonstrate '*no unacceptable adverse effects*'. It is not set out within the NDF what constitutes 'unacceptable' and therefore further definition is required. It is noted that Policy 11 also omits the '*acceptance of landscape change*' principle that is present within the PAs under Policy 10. Realistically, all large-scale renewable energy developments will incur an element of landscape change for the temporary lifetime of those projects, which are fully reversible, although these would differ markedly for wind compared to solar.

Whilst not a presumption in favour, PPW paragraph 5.9.17 currently guides that planning authorities should give significant weight to renewable and low carbon energy generation targets. In circumstances where protected landscape, biodiversity and historical designations and buildings are considered, only the direct irreversible impacts on statutorily protected sites and buildings and their settings (where appropriate) should be considered.

Under this circumstance, it is unclear why the current favourable policy context for renewable energy development contained in PPW would potentially be diluted by the NDF. This would take precedence over PPW given its Section 38(6) of the Planning and Compulsory Purchase Act 2004 Development Plan status.

10. Alternative Approaches

Whilst not necessarily an 'alternative approach', Elgin Energy sees very little wrong with the way in which current national planning policies contained in PPW utilise a criteria-based approach to site selection for solar, recognising that:

'The benefits of renewable and low carbon energy, as part of the overall commitment to tackle climate change and increase energy security, is of paramount importance'.

The above statement coupled with the NDF's clear statement under Policy 12 i.e. National Parks and AONBs are unsuitable for large scale wind and solar, provides clear guidance for developers, flexibility in locating grid capacity and strikes a balance between protecting Wales' most important landscapes and ensuring renewable electricity targets are reached in a cost-effective way.

11. Local Ownership

While not technically being consulted upon, the NDF reiterates the desire for local ownership in relation to renewable projects to be implemented by 2020. However, no detail on what 'local ownership' entails or how it should be delivered has been provided as of November 2019.

Elgin Energy is committed to the local communities in which it operates. Each project provides an opportunity to engage with the relevant local community to identify initiatives that can be supported through a project. This forms a key focus of early public engagement and discussions around every project.

In 2017 Elgin Energy entered a four-year partnership with Generation Science as part of a community benefit scheme for two projects in development; Milltown Airfield and Speyslaw. Generation Science is a STEM education outreach programme for primary schools. This sponsorship is focused on schools in the remote Moray area where these projects are located.

Many models of local ownership are relatively untried and may prove contentious in terms of the geographical definition of 'local' and entry requirements for investment. If the scheme favours those with resources local ownership could prove divisive. Community projects are located safer, healthier and more cohesive in many cases and should not be precluded from a definition of local ownership.

As 'Energy Generation in Wales 2018' highlights, the Prosperity for All plan on the power sector states:

"... a decentralised system contributes to protecting householders and businesses from high energy costs by locating generation near to demand, improving the resilience and flexibility of our energy system and keeping more economic benefit within local communities. Therefore, the move away from fossil fuels combustion to a more low carbon electricity system contributes significantly to all our wellbeing goals."

12. Summary and Conclusion

In summary, Elgin Energy:

1. As an industry leader wishes to be a key partner in the development of solar energy in Wales.
2. Welcomes the vision set out in the draft National Development Framework and its importance alongside other policies.
3. Recognises the climate emergency declared by the Welsh Government and that targets must be reached urgently.
4. Realises that in order to achieve the Welsh Government's economic strategy for continued national investment and delivery of renewable projects, expertise is required.
5. As a global player knows the importance of local delivery but stresses the need for expertise in the field to deliver projects efficiently and within timelines.
6. Realises that clear planning criteria, favouring renewables, is essential to deliver targets.

We trust these representations will be taken into consideration and the Draft NDF amended accordingly. Should you have any queries or wish to discuss any of the issues raised in this letter we would be happy to provide further information or meet to discuss in detail.

Consultation Response Form

Your name	<u>Sean Murphy</u>
Your address	<u>3rd Floor</u>
Preferred contact details (email/phone/post)	<u>Audley House, 9 North Audley Street, London W1K 6ZD</u>
<u>Organisation (if applicable)</u>	<u>Elgin Energy EsCo. Ltd</u>

1. NDF Outcomes (chapter 3)

The NDF has proposed 11 Outcomes as an ambition of where we want to be in 20 years' time.

- Overall, to what extent do you agree or disagree the 11 Outcomes are a realistic vision for the NDF?

[illegible]

- To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

[illegible]

- If you disagree with any of the 11 Outcomes, please tell us why:

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2. Spatial Strategy (policies 1 - 4)

The NDF **spatial strategy** is a guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years.

- To what extent do you agree or disagree with the spatial strategy and key principles for development in...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

3. Affordable Housing (policy 5)

The NDF sets out the approach for providing affordable housing, encouraging local authorities, social landlords, and small and medium-sized construction and building enterprises to build more homes.

- To what extent do you agree or disagree with the approach to increasing affordable housing?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

4. Mobile Action Zones (policy 6)

- To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

5. Low Emission Vehicles (policy 7)

- To what extent do you agree or disagree that policy 7 will enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

[illegible]

- If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

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6. Green Infrastructure (policies 8 & 9)

- To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

[illegible]

7. Renewable Energy and District Heat Networks (policies 10-15)

- To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
Large scale wind and solar developments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
District heat networks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree with the NDF's approaches to green infrastructure, renewable energy or district heat networks, what alternative approaches should we consider to help Wales to enhance its biodiversity and transition to a low carbon economy?

The policy to lower carbon emissions using large scale solar, in particular, is welcomed.

Elgin Energy supports the principle of no large scale wind or solar within statutory landscape designations of National Parks and Areas of Outstanding Natural Beauty (AONB).

However, the designation of Priority Areas for solar and the wording of Policy 11 is questioned.

All solar developments of the scale necessary both in terms of economies of scale to make projects viable and to make a meaningful contribution to the Welsh Government target of 70% of Wales' electricity consumption to come from renewable energy by 2030 will result in a degree of landscape change. This acceptance of change, therefore, should not be confined to Priority Areas alone.

8. The Regions (policy 16)

- To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The NDF identifies three overall regions of Wales, each with their own distinct opportunities and challenges. These are North Wales, Mid and South West Wales, and South East Wales.

9. North Wales (policies 17-22)

We have identified Wrexham and Deeside as the main focus of development in North Wales. A new green belt will be created to manage the form of growth. A number of coastal towns are identified as having key regional roles, while we support growth and development at Holyhead Port. We will support improved transport infrastructure in the region, including a North Wales Metro, and support better connectivity with England. North West Wales is recognised as having potential to supply low-carbon energy on a strategic scale.

- To what extent do you agree or disagree with the proposed policies and approach for the North Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

10. Mid and South West Wales (policies 23-26)

Swansea Bay and Llanelli is the main urban area within the region and is our preferred location for growth. We also identify a number of rural and market towns, and the four Haven Towns in Pembrokeshire, as being regionally important. The haven Waterway is nationally important and its development is supported. We support proposals for a Swansea Bay Metro.

- To what extent do you agree or disagree with the proposed policies and approach for the Mid and South West Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

11. South East Wales (policies 27-33)

In South East Wales we are proposing to enhance Cardiff's role as the capital and secure more sustainable growth in Newport and the Valleys. A green belt around Newport and eastern parts of the region will support the spatial strategy and focus development on existing cities and towns. Transport Orientated Development, using locations benefitting from mainline railway and Metro stations, will shape the approach to development across the region. There is support for the growth and development of Cardiff Airport.

- To what extent do you agree or disagree with the proposed policies and approach for the South East Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If you have any comments about the NDF's approach or policies to the three regions, please tell us. If you have any alternatives, please explain them and tell us why you think they would be better.

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12. Integrated Sustainability Appraisal

As part of the consultation process, an Integrated Sustainability Appraisal (ISA) was conducted to assess the social, economic and environmental impacts of a plan. The report identified a number of monitoring indicators, including health, equalities, Welsh language, the impact on rural communities, children's rights, climate change and economic development.

- Do you have any comments on the findings of the Integrated Sustainability Appraisal Report? Please outline any further alternative monitoring indicators you consider would strengthen the ISA.

13. Habitats Regulations Assessment

As part of the development of the NDF, a Habitats Regulations Assessment (HRA) was undertaken. The purpose of the HRA process is to identify, assess and address any 'significant effects' of the plan on sites such as Special Areas of Conservation and Special Protection Areas for birds.

- Do you have any comments on the Habitats Regulations Assessment report?

14. Welsh Language

We would like to know your views on the effects that the NDF would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

- What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Please also explain how you believe the proposed NDF could be formulated or changed so as to have:

- I. positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and
- II. no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

15. Further comments

- Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

16. Are you...?

Providing your own personal response	<input checked="checked" type="checkbox"/>
Submitting a response on behalf of an organisation	<input type="checkbox"/>

Responses to the consultation will be shared with the National Assembly for Wales and are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here	<input type="checkbox"/>
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