

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

Via Email: ndf@gov.wales

15 November 2019

Dear NDF Team

Draft National Development Framework – Consultation Response for Lightsource BP

The National Development Framework (NDF) will form the highest tier of development plan, shaping the growth of Wales for both present and future generations. As a leading solar energy developer, Lightsource BP (LSBP) welcome the opportunity to make representations on this crucial document, to facilitate sustainable growth in Wales.

At the heart of the NDF are four key national priorities: sustaining and developing a vibrant economy, decarbonisation, developing resilient ecosystems and improving the health and well-being of our communities. These seek to improve the economic, social, environmental and cultural well-being of Wales with decarbonisation emphasised as a national priority.

The UK Government's Committee on Climate Change (CCC) May 2019 report sets out actions required for the Government to achieve "Net Zero Status" (meaning net zero greenhouse gas emissions) by 2050. These actions include quadrupling the amount of renewable energy generation in the UK.

Wales has set an ambitious target that by 2030 renewables are to generate electricity equal to 70% of its consumption. Currently, up to 48% of electricity consumption in Wales is from renewables. It has set a further target for Wales to achieve a 95% reduction in greenhouse gas emissions by 2050 with an ambition to go beyond the target and achieve 'net zero'.

LSBP agree with Welsh Government (WG) that the Planning System has a fundamental role in supporting and delivering these renewable energy targets and decarbonising our society. It is therefore appropriate that the NDF establishes clear, in principle policy support for renewable energy and a framework to support significant growth in the development of renewable energy generating facilities such as solar.



Lightsource BP

LSBP is a global market leader in the development, acquisition and long-term management of large-scale solar projects and smart energy solutions. Lightsource was established in 2010 and has developed significant expertise in the UK renewable energy sector. In 2017 Lightsource joined forces with BP and rebranded to become Lightsource BP. The company has invested £2.5 billion into solar assets over the past 9 years and currently manages 2 GW of solar projects.

LSBP have extensive experience of working within local communities in Wales to deliver over 83 MW of capacity across 16 solar farms.

Solar Power

Solar power is the world's fastest growing source of new energy because it has the potential to meet many of the low-carbon challenges we are facing today. It is increasing in popularity because it is cost-competitive, versatile, and has very limited environmental impacts. Compared with traditional power plants, solar installations are quick to deploy and can be operational in a matter of months.

Furthermore, farmland and rural economic diversification with solar has been proven as a good solution to support rural business. It provides a secure and sustainable income as well as protection from market and weather volatility. About 70% of a solar installation is open grassland. If it's appropriate, agricultural land can remain in use with smaller livestock such as chickens or sheep grazing beneath and between the rows of solar panels.

Natural resources and resilient biodiversity and ecosystems support the well-being and prosperity of Wales. The UN's 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. Solar projects create opportunities to enhance habitats and support net gain in local flora and fauna.

Parts of Wales benefit from some of the highest solar irradiation levels in the UK, making it an excellent renewable energy resource to support the transition to a low carbon economy.

Whilst both solar and wind energy generating facilities produce renewable energy, they are distinct technologies with different landscape and environmental impacts, and LSBP consider these differences should be clearly acknowledged within the NDF. For example, whilst large scale solar can occupy a greater application site area than wind, the majority of structures are generally no higher than 3m, keeping any associated landscape impacts to a very localised level. This is in comparison to the height of onshore wind turbines which are currently being proposed with blade tip heights in excess of 150m. In addition, large scale solar farms do not result in noise and vibration. Therefore, LSBP would suggest that these two technologies should be considered under separate policies, reflective of the distinct nature and characteristics of the generating stations.



Both wind and solar operate very differently in terms of commercial viability. What works for one technology may well not work for another. Therefore, to ensure delivery of both technologies, policies within the NDF should be mindful of the differing viability and constraints associated with each technology.

Proposed Priority Areas

LSBP supports the WG broad approach to identifying Priority Areas for solar. Providing areas within which landscape change is accepted will assist in bringing forward large scale solar projects and the associated decarbonisation of the electricity network.

In LSBPs extensive experience of identifying, developing and operating solar farms, the individual field parcel selection is paramount to progressing a suitable and viable project whilst minimising environmental impacts. With this in mind it is crucial that both within and outside the Solar Priority Areas, there is flexibility to deliver suitable sites, and that the Solar Priority Areas do not result in a de facto exclusion of solar development outside these areas.

The Draft NDF identifies Priority Areas for Solar and Wind Energy on Page 42. At this output scale it is not possible to identify whether a particular land parcel may be within or on the edge of these broad areas. Whilst it is understood that the Arup Study (Stage 1, March 2019 and Stage 2, June 2019) has informed these areas, it would be beneficial for the NDF to refer to this evidence base. The evidence base shows further granularity for each Priority Area, albeit still no clear identification of the boundary of the areas.

Draft NDF Policy 10 and Draft NDF Policy 11 will be applied to large scale solar development projects, dependent on whether they are within a Priority Area or outside. It is therefore essential that the Planning Inspectorate, WG, developers, stakeholders and local communities can identify which policy is applicable.

Grid Connection, Capacity and Upgrades

Stage 2 of the Arup Study includes a 20km buffer from substations for a grid connection. For unsubsidised solar this is a significant and costly connection distance and one where many solar sites are likely to be simply unviable. With this in mind it is important that the NDF does not preclude appropriate sites, outside the Priority Areas, which may provide suitable grid connection as well as an appropriate planning and environmental context.

In addition to the above, while grid capacity is a key constraint to solar development, it is also a fluid constraint with available capacity across the network changing on a regular basis depending on upgrades and other operational changes. The NDF has a timeframe of 20 years. It is therefore important that this policy approach is flexible enough to accommodate future changes in grid capacity, to ensure that the ambitious renewables targets in Wales are delivered.



The Draft NDF indicates on Page 36 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 LSBP supports the direction of travel of this statement, it is unclear how this will be facilitated and at what stage.

In order for a renewable energy project to be progressed it is essential that grid capacity is available. This capacity will steer the scale and broad location of proposed projects. With this in mind, building a critical mass of renewables projects will only occur once there are clear plans for new or reinforced grid infrastructure in place and solid commitment. Without a clear strategy for grid upgrades there will be a resultant ‘chicken and egg’ situation whereby projects are unviable until grid capacity is available and grid investment is delayed until a sufficient mass of projects are ready to progress. This could significantly limit the ability to deliver the renewable energy generation targets set by WG.

Comments on Draft Policy 10

LSBP supports the general presumption in favour of solar development within the Priority Areas and the associated acceptance of landscape change.

The subtext to the policy on Page 38 indicates that further guidance will be provided. At this stage in the absence of draft guidance it is unclear how this policy will be implemented and what further limitations on the presumption in favour there may be.

The subtext also indicates that *‘The implementation of developments within the Priority Areas will be monitored against the Welsh Government’s renewable energy targets.’* – It is unclear whether this is suggesting a cap will be included when targets are reached or a mechanism to facilitate delivery where the targets are falling behind. Further clarification should be provided on this and in particular the definition of ‘implementation’ to avoid unviable and undeliverable projects potentially holding up suitable, deliverable and viable projects from connecting to the grid.

Comments on Draft Policy 11

LSBP supports the flexibility of Draft Policy 11 as it is critical that suitable areas outside the Priority Areas are not precluded from appropriate solar developments. As set out earlier in these representations, solar in particular is difficult to assess at a national or even regional scale. From landscape and heritage impacts perspective in particular, the selection of individual field parcels within an area can have a critical bearing on the suitability of a project.

Current policy in Planning Policy Wales 10 (PPW) sets out at Paragraph 5.7.8 *‘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.’* PPW also highlights that the planning system should ‘maximise renewable and low carbon energy generation’.

Whilst not explicitly a '*presumption in favour*', PPW outlines 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 in the decision-making process, only the direct irreversible impacts on statutorily protected sites and buildings and their settings (where appropriate) should be considered.

Draft Policy 11 appears to set a higher assessment bar than that within PPW, where a site falls outside a Priority Area. What is currently broadly a presumption in favour, must now demonstrate '*no unacceptable adverse effects*'. The definition of 'unacceptable' is unclear. LSBP consider that whilst it is reasonable that there must be a greater justification for the development of sites outside the Priority Areas, they should still carry a presumption in favour of delivering renewable energy generation. The acceptability of adverse effects will form part of the planning balance which must still be weighted in favour of renewable energy projects which can deliver the WG targets for clean energy generation.

The Draft NDF discusses the WG targets for new renewable energy projects to have at least an element of local ownership by 2020. The consultation document does not set out any further definition as to what this will encompass and how it will be delivered, whilst ensuring deliverability of large scale renewable energy projects. LSBP take all projects forward as a significant investment within the local community and this forms a key focus of our early engagement and discussions around each project.

These are tailored for each community within which LSBP works. Applying a blanket renewables strategy covering both solar and wind under one policy is unlikely to be the most appropriate approach to ensuring the delivery of renewable energy targets, whilst securing the social, environmental and economic benefits that these projects can secure.

Energy Atlas

The subtext to Draft Policy 13 refers to the preparation of an Energy Atlas which will consider opportunities for all types of renewables. The Arup Study (2019) refers to the Energy Atlas as providing a focus on regional energy planning. It is unclear therefore whether the Energy Atlas will subsequently refine the Solar Priority Areas further, or whether this will focus on other technologies, as the NDF suggests.

Summary

LSBP consider that Wales can become a world leader in renewable energy technologies. Solar is at the forefront of this shift to clean energy generation and the Draft NDF reinforces the WG commitment to deliver significant growth in renewables.



LSBP supports the WG ambitious renewable energy targets and considers that the direction of travel of policy with regards to solar is supportive of continuing growth in this technology. There are a number of areas around the delivery of these targets which LSBP have made comments on and would be pleased to have the opportunity to discuss these matters with WG, should that be considered beneficial.

Yours faithfully,

Richard Turner BSc (Hons) MSc MRTPI

Senior Environmental Planner

richard.turner@lightsourcebp.com



Enc: Completed Consultation Document

Consultation Response Form

Your name	Richard Turner
Your address	Lightsource BP 33 Holborn London EC1N 2HU
Preferred contact details (email/phone/post)	richard.turner@lightsourcebp.com [REDACTED]
<u>Organisation (if applicable)</u>	Lightsource BP

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...

[illegible]

- 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?

Please see the attached detailed representations made with regards to Renewable Energy and in particular Draft Policies 10 and 11 and the Solar Priority Areas.

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?

[illegible]

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?

[illegible]

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?

Please see the attached detailed representations made with regards to Renewable Energy and in particular Draft Policies 10 and 11 and the Solar Priority Areas.

16. Are you...?

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