

November 2019

RenewableUK Cymru statement to Climate Change, Environment and Rural affairs committee regarding the draft National Development Framework 2020-2040

Introduction

Renewable UK Cymru (RUKC) is part of Renewable UK and is responsible for facilitating a renewable energy policy environment in which its members can operate, helping them grow their businesses and providing influencing and networking opportunities.

RUKC is grateful to the National Assembly for Wales climate change, environment and rural affairs committee for providing this opportunity to contribute to the scrutiny of the National Development Framework (NDF). RUKC has restricted its comments to the development of large scale wind and solar renewable energy and other renewable energy projects i.e. NDF policies 10-13.

1. RUKC statement regarding the NDF's scope and ambition

1.1 Wales finds itself in a different political, environmental and societal situation to that which provided the context to the targets it set for the delivery and ownership of renewable energy in 2017¹.

1.2 The NDF is a generation defining opportunity to put in place a new planning framework that can unlock Wales' potential to meet the challenges of the declared climate emergency.

1.3 RUKC broadly welcomes the Welsh Government's positive approach to renewables and the efforts made to reflect this in the narrative and policies of the NDF, summarised as follows²:

"The challenges of climate change demand urgent action on carbon emissions and the planning system must help Wales lead the way in promoting and delivering a competitive, sustainable decarbonised society. Decarbonisation and renewable energy commitments and targets will be treated as opportunities to build a more resilient and equitable low-carbon economy, develop clean and efficient transport infrastructure, improve public health and generate skilled jobs in new sectors."

1.4 RUKC appreciates there are continuing limitations on Welsh Government's ability to develop and manage a holistic approach to the decarbonising agenda while it still does not have full control over matters such as electricity transmission and The Crown Estate's leasing regime for the development of marine energy. However, the inter-relatedness of the UK energy system was evident during the recent Low Frequency Demand Disconnection event on August 9th, 2019 where many thousands of Welsh customers were temporarily impacted.

1.5 This supports RUKC's position that the NDF must not be 'silent' on the support required for other renewable energy development and how these technologies potentially contribute to a resilient and secure energy system. This includes reference to offshore wind (and onshore infrastructure associated with offshore wind development) and energy development that will facilitate renewable energy, e.g. pumped hydro.

¹ P.3 Electricity generation in Wales 2017, Welsh Government

² P.21, National Development Framework 2020-2040

1.6 Neither does the NDF provide a solid decision-making framework for any other type of non-energy related DNS e.g. airport-related development, railways, highways.

1.7 RUKC is cognisant of the challenge of designing policy which accommodates a significant degree of economic and political unpredictability both in the immediate future and over the longer term. As noted in the First Minister's Foreword, "It is difficult to imagine how the world might look in 2040"³

1.8 RUKC believes Welsh Government should articulate a clear direction of travel as regards Wales' future position as a net power exporter within the context of the NDF. This should include its analysis of how decarbonising heat and transport is likely to impact demand for renewable electricity. With an increased policy emphasis on local benefit, Wales stands to benefit from an increase in locally generated renewable electricity, however the policy position on the export of electricity from renewables remains unclear.

1.9 RUKC believes the consultation document would also have benefitted from providing some insight into Welsh Government's view of the future interaction between expected increased demand arising from the decarbonisation of heating and transport, the need for complementary renewable energy technologies and the need to upgrade the electricity transmission and distribution networks in and between Wales' regions. RUKC suggests that the NDF should acknowledge the likely need for improved grid infrastructure to deliver future decarbonisation.

1.10 Furthermore, the NDF takes little account of the huge challenge to decarbonise heat beyond the establishment of District Heat Networks and to offer support "wherever they are viable"⁴. More consideration could have been given to a decarbonisation roadmap where the electrification of heating and transport and re-purposing of the gas distribution network may both need to play strategic roles in delivering a 'street by street' solution to decarbonisation.

1.11 In summary, RUKC believes the NDF lacks a unifying strategic vision for Wales' future energy system. A greater balance could have been achieved between proposing specific policy approaches for specific technologies and offering a more coherent view of how the energy system will need to accommodate decarbonising heat and transport.

2. RUKC statement on the NDF's policy proposals for Renewable Energy

2.1 RUKC recognises that the ambition and scope of the NDF represents a step change from the outgoing Technical Advice Note 8 'Planning for Renewables Energy' (July 2005) (TAN8). TAN8 restricted opportunities for developing projects >25MW largely to the Strategic Search Areas (SSAs) and provided limited opportunities for 5-25MW projects, whereas the NDF envisages consideration of large scale renewable energy projects (>10MW) in all areas outside those which have special designations. RUKC welcomes this.

2.2 RUKC believes that the policy wording outlined in policy 10 should be applicable to all areas outside NPs and AONBs (i.e. those currently defined as the 'red' areas within Welsh Government's proposed 'traffic light' approach)⁵, with the application of an appropriate criteria based approach. RUKC analysis indicates that a significant proportion, if not the majority of development will have to come from areas outside the currently defined Preferred Areas.

2.3 RUKC does not advocate 'carte blanche' for development. It is highly unlikely that any developer would seek to establish a project in areas carrying, for example, Site of Special Scientific Interest (**SSSI**), Special Area of Conservation (**SAC**) or Special Protection Area (**SPA**) designations. Rather, RUKC

³ P.4 National Development Framework 2020-2040

⁴ NDF, P.43

⁵ NDF. P.37

favours a sensible criteria-based policy whose *ethos* carries a presumption in favour of landscape change in areas outside those with special designations. This would seem more aligned with the step change required to meet the challenge of the declared climate emergency and net zero ambition. It is also the approach implied by Planning Policy Wales⁶:

“Planning authorities should give significant weight to the Welsh Government’s targets to increase renewable and low carbon energy generation, as part of our overall approach to tackling climate change and increasing energy security. 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. In all cases, considerable weight should be attached to the need to produce more energy from renewable and low carbon sources, in order for Wales to meet its carbon and renewable targets.”

2.4 RUKC has consistently advocated that ‘lines on maps’ should not form the basis of subsequent iterations of planning policy following TAN8. The SSA model in TAN8 engendered considerable ill-will within local communities and host authorities for whom landscape change, both in terms of renewable energy projects and their associated grid connections, were viewed as a ‘fait accompli’, fuelling already implacable opposition to renewable energy (onshore wind) development. It is regrettable therefore that industry views relating to the proposed ‘priority areas’ model do not appear to have been considered.

3. RUKC statement on the proposed priority areas for renewable energy development.

3.1 RUKC conducted a mapping exercise to establish the likely developable opportunity (% of unconstrained area) of the 11 priority areas identified as ‘wind only’ priority areas. (i.e. it excluded priority areas 2, 4, 12 and 13 which are designated as ‘solar only’ priority areas).

3.2 RUKC has engaged with colleagues in the solar renewable energy sector and the Solar Trade Association (STA). Its understanding is that the STA will engage with the NDF and provide its view independently.

3.3 According to RUKC’s analysis, the total area of developable (unconstrained) opportunity for the 11 priority areas which relate to onshore wind equates to approximately 5%. In these areas, it is likely that the vast majority of developable opportunities would relate to sites of less than 10MW capacity, and therefore not within the NDF’s remit.

3.4 A further mapping exercise is being undertaken by RUKC applying a criteria based approach to developing onshore wind projects (as opposed to the ‘priority area’ approach). The purpose is to establish the extent to which this approach would deliver a greater area of developable opportunity and commensurate uplift in potential capacity for onshore wind.

3.5 N.B. RUKC’s detailed analysis of the priority areas and results from its mapping exercises, including the constraints/criteria it has applied in order to generate its results, will be submitted as part of its formal consultation response to Welsh Government.

⁶ Planning Policy Wales(v.10) Section 5.9.17

3.6 For both exercises, it will be important to note that the indicative potential developable capacity (MWs) within an area is unlikely to ensue i.e. achieving a particular level of MW capacity within an area would likely require a far higher *potentially* developable capacity.

3.7 It is therefore RUKC's view that the priority areas as drafted are highly unlikely to be fit for purpose either in relation to the ambition set out in outcome 11 of the NDF (**see above 1.3**) or in the context of the UK Committee on Climate Change's view of meeting the netzero challenge:

“Renewable generation could be four times today's levels, requiring a sustained and increased build out between now and 2050, complemented by firm low-carbon power options such as nuclear power and carbon capture and storage (applied to biomass or gas-fired plants)”⁷

⁷ UK Committee on Climate Change (May 2019) Net Zero: The UK's contribution to stopping global warming