

Environment and Sustainability Committee

Inquiry into Energy Policy and Planning in
Wales

EPP 266 – Campaign for National Parks



Ymgyrch y Parciau Cenedlaethol

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The Campaign for National Parks' submission to the National Assembly for Wales Committee on the Environment and Sustainability

Introduction

The Campaign for National Parks (CNP) welcomes the opportunity to present the Committee with a paper setting out its views on energy policy and energy planning in Wales.

CNP exists to protect the beautiful and spectacular landscapes of our National Parks to ensure that current and future generations continue to enjoy the pleasure they can bring, in particular the opportunities for peaceful recreation and spiritual renewal. CNP also promotes the benefits of accessing National Parks to people from all sections of society and is particularly active in encouraging those from black and minority ethnic groups to visit National Parks.

One of CNP's key campaigns is to ensure that energy generation and supply do not result in harm to National Parks. The organisation is currently working

to ensure that the country's energy needs are met in an environmentally sustainable way. National Parks have an important role to play in this, but CNP is concerned to ensure that the special qualities of these exceptional landscapes are not lost or damaged in the drive to meet society's energy requirements. Whilst we fully support the Welsh Government's aims to reduce energy consumption and de-carbonise the generation of electricity, we would not want to see any detrimental impact on the nationally designated landscapes of Wales, which are iconic tourist attractions, renowned worldwide and greatly valued by the people of Wales.

Comment on Terms of Reference

The Committee wishes to consider how the current devolution arrangements for energy policy and planning affect the delivery of the Welsh Government's desired future "energy mix" in Wales, as set out in A Low Carbon Revolution – Energy Policy Statement 2010 and the UK Renewable Energy Roadmap 2011.

A Low Carbon Revolution makes it clear that Wales's future economic, social and environmental well being is dependent on achieving sufficient supplies of affordable low carbon energy. The use of the Welsh Government's powers to achieve this vision is constrained in a number of ways. First, the Welsh Government does not have the statutory power to approve energy generation developments over 50 MW. This means that decisions for major energy projects are taken by a UK Government Minister who is likely to take account of the UK's energy needs rather than the specific sustainable development needs of Wales. Secondly, decisions to build power stations ultimately rest with individual generation companies on the basis of commercial return. The Welsh Government can encourage those commercial projects that are acceptable and in line with its strategic policy objectives, however final decisions are dependent on the approval of the relevant company boards and ultimately will be dependent on the approval of the DECC Minister on the advice of the Infrastructure Planning Commission/Major Infrastructure Planning Unit. Thirdly, the Welsh Government has no mechanism by which it can exercise power to deter/refuse those larger energy generation or supply

projects that do not fit with its sustainable development and wider environmental objectives.

It is, however, reassuring to note that the Welsh Government is using its current powers in the quest for a low carbon economy to maximum effect by investing significant sums of money in domestic energy efficiency and alleviating fuel poverty, whilst also investing in small scale renewable schemes. In respect of the latter, there are some concerns within National Parks about the potential cumulative impact on the landscape from the proliferation of small scale renewable energy schemes, in particular wind energy developments.

As stated in “A Low Carbon Revolution” Wales has a diverse supply of energy, primarily because of its geography and natural resources. It is noted that there is an abundance of wind and marine renewable resources in Wales that can contribute to a low carbon economy. However, the power to utilise these in order to meet Wales’s own energy requirements and in a way that minimises carbon dioxide emissions does not entirely lie in the hands of the Welsh Government, as stated above.

The UK Renewable Energy Roadmap illustrates the commitment of all UK Governments to increasing renewable energy developments and reducing overall costs to the consumer. The UK Government has stated its particular commitment to increasing the deployment of renewable energy for electricity, heat and transport across all four countries. The facts that Wales is so rich in renewable wind and marine resources, and that the Welsh Government has such limited powers over energy developments within its country, clearly presents some risks in terms of achieving the Government’s sustainable development objectives and the protection of our landscapes, in particular National Parks. For example, there are risks that the UK Government could approve further large wind energy developments in areas of upland peat soils, with the potential to cause erosion and degradation of these areas. The proliferation of wind energy developments on the uplands of Wales may well have an adverse impact on tourism, which could affect the economic development of communities within the beautiful landscapes of National Parks.

Furthermore, the current system for the approval of energy projects is confusing to some interested organisations and the general public. It is not entirely clear to those working outside the sector where decision making responsibility lies for different size developments and their associated infrastructure requirements. For example, the Welsh Government decides on onshore energy developments below 50 MW, whilst the UK Government makes decisions on all those above this threshold, with local planning authorities having responsibility for associated developments such as substations and the Environment Agency covering pollution control and issuing discharge consents. In respect of offshore wind energy developments the consenting regime is even more complicated involving the Crown Estate and the Marine Management Organisation. The intended purpose of the 2008 Planning Act was to simplify decision making on major planning developments and make the decision making process more integrated – this has not been achieved for major energy projects in Wales.

In the context of energy policy and planning in Wales, it is also important to consider supply arrangements such as the LNG development at Milford Haven and oil and gas exploration off the Welsh Coast for which approval again is the responsibility of DECC. Such developments have the potential to result in major environmental impacts. A more joined up and simplified approach is needed on them.

The Welsh Government target of reducing greenhouse gases by 3% year on year is to be commended and it is encouraging to note that a year on year decline amounting to 23% over approximately 20 years has been achieved. National Parks in Wales have an important role to play in providing carbon sinks for CO₂ emissions. However, CNP has concerns about the fact that the Welsh Government has limited control over achievement of this target as energy generation and supply decisions taken by the UK Government have the potential to damage the environment and could well destroy some of the areas within the Welsh uplands that currently or could in the future provide carbon sinks.

Apart from the lack of control over how UK decisions on energy developments may affect the environment, such decisions may also not always be in accordance with Welsh Government planning policy. There is the potential for such decisions to undermine the Wales Spatial Plan, and other planning frameworks and guidance such as TAN 8 and the Renewable Energy Roadmap. Furthermore, they could conflict with National Park Authorities' Local Development Plans and National Park Management Plans.

Energy generation projects always require associated and ancillary works, which include upgraded or new transmission infrastructure. CNP has been campaigning for some time on the adverse effect that overhead high voltage lines can have on the landscapes of National Parks. The fact that the Welsh Government has no responsibility for major infrastructure developments limits its ability to influence the development of a new approach on high voltage lines that would encourage undergrounding in National Parks, Areas of Outstanding Natural Beauty and other sensitive areas in order to safeguard their landscape value. There is public support for the undergrounding of high voltage lines in National Parks and Areas of Outstanding Natural Beauty as shown by a recently published survey by National Grid on public attitudes to energy transmission.

The Welsh Government is, and has been, leading the way globally in terms of prioritising sustainable development and taking measures to combat climate change. It is using these priorities to support growth of the economy and to develop the Natural Environment Framework: A Living Wales. To take forward these key cross cutting strategic aims, CNP maintains that the Welsh Government would benefit from having full powers over the way Wales's land, sea and renewable resources are used to generate and supply energy.

In summary, the Welsh Government will inevitably find it more difficult to deliver its economic, social and environmental targets and policy ambitions if it is not directly responsible for all the decisions relating to energy projects in

Wales and the associated infrastructure developments. There is no rationale for Scotland having these powers but them being held from Wales.

Responses to Issues

The role of the different consenting agencies

There are various forms of energy generation, these include oil, gas, coal, nuclear together with renewable, low carbon sources such as onshore wind, offshore wind, tidal range, tidal stream and wave energy, hydropower, geothermal, bio-energy and waste. Government and agencies' responsibilities for the sanctioning of these different forms of generation vary according to the size, location and type of development. It is a confusing landscape, compounded by the UK Government's decision to take away the decision making powers for the recently established Infrastructure Planning Commission (IPC), which currently decides on all applications for consent for onshore energy developments of more than 50MW and offshore developments of more than 100 MW. In respect of offshore developments, the establishment of the Marine Management Organisation since 1 April 2010 further complicates matters by its responsibilities to process offshore renewable generation above 1 MW and up to 100 MW in English and Welsh territorial waters and the Renewable Energy Zone.

Reducing the number of consenting agencies and treating energy projects as single consents would improve the ability of the public to engage in the decision making process and result in a more integrated approach to assessing the potential benefits and impacts of energy developments.

Relationship between UK Government and Welsh Government Energy Policy

The UK Government has committed to delivering an Annual Energy Statement, the first of which was presented to Parliament on 27 June 2010. Its aim is to provide market direction, set strategic energy policy and help to guide

investment. The Annual Energy Statement presented a clear statement of Government objectives, which are crucial to meeting key goals on carbon emission reductions, energy security and affordability. It focuses on the priorities of DECC, which are saving energy through the Green Deal and supporting vulnerable consumers; delivering secure energy on the way to a low carbon energy future; managing the country's legacy responsibly and cost effectively; and driving ambitious climate change action at home and abroad. These are compatible with the aims of the Welsh Government, which are increasing energy efficiency performance; producing low carbon electricity on a large scale; and maximising the short and long term benefits for Wales's economy and society of the move to a low carbon energy system. The most notable differences are the UK Government's concern with security of supply internationally and its responsibilities for liabilities, particularly in relation to nuclear waste.

In July 2011, the UK Government approved six National Policy Statements for Energy (NPS) under the Planning Act 2008. These statements set out national policy against which proposals for nationally significant energy projects are to be assessed and decided on by the Infrastructure Planning Commission. The overarching NPS states that the IPC will examine the majority of applications for nationally significant infrastructure projects in England and Wales and the offshore Renewable Energy Zone (REZ). However, certain projects in Wales will not be covered by the IPC. These include LNG facilities, gas reception facilities or gas transporter pipelines and underground gas storage facilities, except in certain circumstances. Under the arrangements, Welsh Ministers will still be able to consent offshore wind energy schemes in territorial waters adjacent to Wales under the Transport and Works Act 1992. Each of these policy statements set out the conditions under which electricity generation plants should be allowed to go ahead; the considerations that need to be taken into account; and the planning conditions under which consent should be given. Although Wales is referenced in these statements, full account is not taken of the overall planning arrangements in Wales and the country's economic and social needs.

In order to achieve the UK target of cutting carbon emissions by 34% by 2020 and by at least 80% by 2050 through investment in energy efficiency and clean energy technology, such as renewables, nuclear and carbon capture storage, Wales clearly has to play its part in this challenge. DECC's UK Renewable Energy Roadmap is a mechanism for meeting this challenge. The document has been issued in partnership with the Devolved Governments and as such is complementary to the Welsh Government's Energy Policy Statement.

Potential Contribution and likelihood of different types of renewable energy, low carbon energy development, and contribution to reducing greenhouse gas emissions

The Campaign for National Parks does not have the in-depth knowledge or expertise to respond to this point on the basis of sound evidence. However, it recognises that all of the technologies have the potential to reduce greenhouse gas emissions. In each of the Welsh National Parks there are examples of low carbon energy generation. However, it is vital that these are kept at an appropriate scale in order to protect the value and beauty of nationally designated landscapes. Whilst, it is considered vital that National Parks play a full role in providing for renewable energy and low carbon energy generation facilities, this will require clear guidance, dedicated funding and increased understanding and awareness of opportunities and constraints in relation to developments within National Parks. Any guidance to the various consenting agencies should remind them of the importance of adhering to their statutory duty to have regard to National Park purposes during the decision making process.

CNP supports the view of the importance of having a diverse mix of energy generation facilities within Wales in order to ensure security of supply. In respect of National Parks, we consider that they have the potential to play their part in future low carbon and renewable energy generation and supply, providing developments do not detract from their landscape value. However, we would not support nuclear power developments in or near to National Parks and would be concerned about any plans to build another nuclear power

station on the site of Trawsfynydd in Snowdonia National Park. We would also be keen to ensure that full consideration is given to relocating the Intermediate Level Waste from Trawsfynydd once a national repository for such waste has been constructed.

In respect of energy developments outside National Parks that necessitate new or strengthened transmission lines, the first approach should be for these to avoid nationally designated landscapes such as National Parks. If it is not feasible to find a route that avoids our finest landscapes there should be a presumption in favour of undergrounding such lines, unless there are compelling environmental reasons not to do so. We note that the House of Commons Energy and Climate Change Committee has recently issued a report on a European super grid. This found that the need to transmit electricity from north to south and from offshore to onshore could have a very damaging effect on the landscape. It considers that an integrated offshore grid could minimise the environmental impact of new transmission assets and has recommended that the Government should produce a cost estimate of the value of the social and environmental savings made by reducing the intrusion of onshore transmission assets and publish its assessment of the relative costs of different transmission options: overhead lines; undergrounding; and offshore High Voltage Direct Current lines. CNP suggests that the Committee should consider how the Welsh Government could play its part in ensuring that the high voltage electricity network has the minimum impact on the Welsh landscape.

CNP notes that a new nuclear power station is proposed at Wylfa on Anglesey. We are concerned about the implications that this may have for the Snowdonia National Park, as the transmission lines that transport electricity from Wylfa currently pass through the National Park. It is imperative that full consideration is given to avoiding the National Park for any new or strengthened transmission infrastructure that may be required. Full consideration should be given to alternative routes, such as the sub-sea route from Anglesey to Pembroke. The project also provides opportunities to reduce the impact of

current transmission infrastructure on the landscape of Snowdonia National Park.

The Welsh Government's Energy Policy Statement, rightfully, has mitigating climate change at the heart of it. CNP supports the Government's approach to playing its part in reducing carbon emissions on a global scale. Onshore and offshore wind energy, as proven technologies and in the light of the natural resources of Wales, are evidently key renewable, energy resources for the achievement of a low carbon economy. However, it is important that the drive for low carbon solutions to the country's energy needs are not pursued at the expense of our landscape and biodiversity. The diverse, spectacular and iconic landscapes of the three National Parks are already impacted by low carbon energy developments.

CNP has been campaigning for some time for a formal review of TAN 8 as this policy guidance does not reflect the need to protect the setting of nationally designated landscapes and it is inconsistent with the policy on National Parks in the Ministerial Interim Planning Statement. For example, strategic search areas (SSAs) do not take account of the value of adjoining protected landscapes. The need for this to be reflected in guidance is illustrated with the problems areas like the Brecon Beacons National Park are experiencing. The Park is coming under increasing pressure from major wind energy developments outside its boundary and this is having a detrimental effect on the statutory purposes of National Parks.

Potential of other forms of energy production

CNP believes that there is a role for other forms of energy production providing that their environmental impacts are rigorously assessed and these developments are considered strategically in advance of their exploitation. Again, whilst there is a view that areas within National Parks should be considered for meeting the energy needs of Wales, developments in and adjacent to National Parks will need to be compatible with their purposes.

There is growing pressure for planning to take an integrated approach to land and seascapes because in terms of visual amenity people do not distinguish between land and sea boundaries. It is acknowledged that both tidal stream and wave energy developments off the coast have the potential to make a significant contribution to low carbon energy production. However, sizeable developments could possibly affect the views from both Snowdonia and Pembrokeshire Coast National Parks, especially from the associated landfall arrangements. The economies of these areas are very much dependent on tourism, which could suffer as a consequence of poorly planned offshore energy developments.

In respect of the Glastir Agri-Environment Scheme, it is pleasing to note that support for low carbon energy generation is available. However, the Campaign for National Parks would like an assurance that sufficient safeguards are built into the process to safeguard nationally designated landscapes from developments that may detract from their visual amenity.

Transport Issues

Ideally, to avoid impacts on tourism within National Parks and other scenic areas, CNP would like to see the transportation of energy equipment avoiding such areas as experience has shown that this can be frustrating for visitors and possibly give a negative experience.

However, CNP recognises that in some situations, for example the LNG facility and gas fired power station in Pembrokeshire, it may be impossible to transport turbines and other equipment without impacting on traffic flows within a National Park. It is therefore, important to minimise inconvenience to tourists, visitors, businesses and local people through careful route planning and greater effort to select times for transportation when roads are relatively free from traffic.

Summary

In conclusion the Campaign for National Parks commends the Welsh Government's twin aims of generating twice as much electricity as we use today through low carbon technologies by 2025 and meeting most local energy needs by this method by 2050. The intention to complement this approach with effective demand management and energy efficiency measures is to be further commended.

In respect of onshore wind developments there are concerns amongst a number of landscape protection organisations about the impact on Wales of approval of so many onshore wind energy developments. In this respect, the Campaign for National Parks welcomed the First Minister's statement of 17 June this year, in which he made it clear that the Welsh Government is committed to optimising the production of renewable energy, of which onshore wind is the most attractive commercially, in a strategic manner. However, he stressed that Wales's environment needs to be protected in the process, pointing out that the overall goal of the Government's policy on TAN 8 has been to restrict the proliferation of large scale wind energy schemes across Wales by establishing Strategic Search Areas for consideration of such developments. The First Minister further commented that developers' interest in the Strategic Search Areas has greatly exceeded that which was anticipated and that the level of development is now unacceptable because of the wider impact on local areas. The fact that he called upon the UK Government to take heed of this situation and act to stop proliferation of developments when taking individual decisions is illustrative of the difficulties Wales faces in protecting its much valued environment, and the limited influence the Welsh Government has on the decision making process.

The First Minister also, rightfully, drew attention to the fact that over capacity in onshore wind developments has led to proposals for major new overhead grid infrastructure in Mid Wales, to which the Welsh Government is opposed. He pointed out that in the Energy Policy Statement it is made clear that grid connections should be less intrusive and sensitive to the landscape, and be placed underground in particular circumstances.

CNP supports the First Minister's stance on these issues and has been calling for a review of TAN 8 to ensure that protection of nationally designated

landscapes and their settings are afforded greater prominence in the guidance. A number of the Strategic Search Areas abut National Park boundaries and this is leading to proposals that are in direct conflict with conservation of the landscape in these areas.

There are now an increasing number of plans emerging for development of offshore wind, that are causing concern as much of Wales's coastline is attractive for tourism and some stretches, such as in the Pembrokeshire Coast National Park, are internationally acclaimed. It is vital that an integrated land and seascape approach is taken to deciding offshore developments to ensure that landscapes and seascapes are viewed as one.

As stated in the introduction, CNP aims to protect Wales's beautiful and spectacular National Parks from developments that would detract from their landscape value. It is also concerned to promote access to these areas for all sections of society in order to contribute to the development of the economy and society's well being.

It is stated above, that there is a growing worry amongst a number of landscape protection organisations in Wales, about the proliferation of large onshore wind energy developments, and more recently offshore wind developments, and their impact on the exceptional landscape and seascape value of the country's more scenic areas. It is now apparent that apart from the increasing number of wind developments and their effect on the landscape, the need to reinforce and build new electricity grid connections is also threatening the beauty and attractiveness of a number of parts of rural Wales. Although there are limited biomass developments in Wales, as the commercial attractiveness of this form of renewable energy increases, it is likely that another risk to our landscapes may emerge in the quest for low carbon energy developments. It will be important to build into the planning system appropriate safeguards for protection of Wales's most valued landscapes.

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