

Joint Local Development Plan Anglesey & Gwynedd (2011-2026)

Examination

Hearing Session 8
RENEWABLE ENERGY
9.30 am, Thursday 15 September 2016

Further written statement and evidence to be considered by the Planning Inspectors in support of objections to the **Deposit Plan 2015**, made by Mairede Thomas, AAWT (responder 711) and Anglesey Branch, CPRW (responder 591, 078, and Cwm Cadnant Community Council (responder 596, 601) in respect of Section 7.2 **LIVING SUSTAINABLY**. (Please see the full responses submitted to the Deposit Plan public consultation).

Statement Key

Bold text = Deposit Plan policies and other matters that require attention.

Red text = extracts from the Deposit Plan.

Purple text = the precise change/wording that is being sought.

Blue text = extracts from Deposit Plan Supporting Documents.

Green text = extracts from Documents used and supplied as evidence.

RENEWABLE ENERGY Agenda item 3.

1) Policy ADN2 does not reflect GeoMon Global Geopark's status. Therefore the word "geology" should be inserted after "biodiversity" in the last paragraph of the policy wording.

Without this amendment Policy ADN2 will not provide appropriate safeguards to protect the area's landscape.

2) Policy ADN1 does not provide appropriate safeguards to protect the area's landscape for the reasons set out in the original responses to the Deposit Plan Consultation and in view of the following further evidence and information that has materialised or become known since the Consultation.

a) the UK Government was elected in May 2015 on a manifesto pledge to curtail new onshore wind developments. This was explicitly based on an acknowledgement that communities value the landscapes in their neighbourhoods and localities and that they should be able to veto onshore wind energy developments including those proposed for undesignated landscapes. The UK Government has amended planning law and planning policy for England accordingly. There have also been amendments to Welsh Planning Policy, but as yet these do not confer the same rights to Welsh communities. We consider that Welsh communities should have no lesser rights than communities in England.

b) The existence of Policy 31 in the current statutory plan for Anglesey, i.e. Ynys Mon Local Local Plan 1996, is evidence of the value that Anglesey County Council and its residents have historically placed on the landscapes of Ynys Mon.

c) Responses to the '**Onshore Wind Energy SPG for Anglesey**' consultations conducted in 2012 show that, as far as the local community is concerned, the need to conserve, protect and enhance Anglesey's landscape has not changed. The SPG consultation responses were explicit about the maximum size of wind turbines that should be permitted and about the distance between developments and homes.

d) The community of Ynys Mon was not given the opportunity to consider the effect of the removal of most of Anglesey's SLA during the Onshore Wind Energy SPG consultations. The LUC 'Review of Special Landscape Areas in Gwynedd and Anglesey' was received by the JLDP Unit in December 2012, after the SPG consultation had closed. The Onshore Wind Energy SPG for Anglesey was adopted, subsequent to consideration by the Full Council in January 2013, as supplementary to the current statutory Local Plan.

e) The Onshore Wind Energy SPG was not then included as part of the Deposit Plan Consultation for the JLDP, despite the fact that we were led to believe that, given the SPG consultation for the 1996 Local Plan was undertaken coincident with the Pre-Deposit Plan preparations, at the very least it would be taken into account in the formulation of policy for the JLDP. As is evident during the SPG consultations in 2012 it was not apparent that the Ynys Mon

SLA would be changed so drastically. There was no opportunity to evaluate the proposed new boundaries allocated for Special Landscape Areas within Anglesey against the recent SPG consultation. These facts surely make the Deposit Plan and policy ADN1 unsound.

f) There has been no JLDP public consultation which takes account of the new landscape designation GeoMon Global Geopark and the implications of that designation in respect of Policy ADN1. UNESCO encourages this:-

STATUTES OF THE INTERNATIONAL GEOSCIENCE AND GEOPARKS PROGRAMME

Part B: UNESCO Global Geoparks

Article 1: UNESCO Global Geoparks

UNESCO Global Geoparks, within the IGGP, are the mechanism of international cooperation by which areas of geological heritage of international value, through a bottom-up approach to conserving that heritage, support each other to engage with local communities to promote awareness of that heritage and adopt a sustainable approach to the development of the area. Through the IGGP, these areas can apply to UNESCO, for designation as a “UNESCO Global Geopark”, drawing upon the broader mandate of the Organization

Article 2.1 UNESCO Global Geoparks within UNESCO’s International Geoscience and Geoparks Programme

UNESCO Global Geoparks, within UNESCO’s International Geoscience and Geoparks Programme (IGGP), encourage international cooperation between areas with geological heritage of international value, through a bottom-up approach to conservation, local community support, promotion of heritage and sustainable development of the area. Through the IGGP, these areas apply to UNESCO as the only United Nations organization with a remit in the Earth Sciences to designate as a “UNESCO Global Geopark”, which draws upon the broader mandate of the Organization.

Article 3. (v) UNESCO Global Geoparks should actively involve local communities and indigenous peoples as key stakeholders in the Geopark. In partnership with local communities, a co-management plan needs to be drafted and implemented that provides for the social and economic needs of local populations, protects the landscape in which they live and conserves their cultural identity. It is recommended that all relevant local and regional actors and authorities be represented in the management of a UNESCO Global Geopark. Local and indigenous knowledge, practice and management systems should be included, alongside science, in the planning and management of the area.

http://www.globalgeopark.org/UploadFiles/2012_9_6/IGGP_EN_Statutes_and_Guidelines.pdf

The fact of the increasing size and depth of the concrete foundations needed for wind turbines, classified as Micro, Small, Medium, Large and Very Large in the ‘Wind Energy Typology’ column in Table 13 on page 85, is problematic. Developments of these sizes will result in an unwarranted destruction of the

valuable geological resource. And cultural, educational and eco-tourism opportunities to interpret and experience the Global Geopark will be lost.

g) There are less harmful ways of realising the plan area's potential for renewable and low carbon energy.

h) The Welsh Government has introduced **The Environment (Wales) Act** which provides a legal basis for the sustainable use of natural resources and wind farms do not meet those criteria on Ynys Mon.

i) SLA designated landscapes are an important part of the local landscape and they support the tourism economy.

On Anglesey the SLA is inside the AONB. This attractive landscape encourages tourists away from the coast and into the interior of Ynys Mon. In this way the SLA can be used to accommodate certain kinds of tourism activity and developments and in so doing can help take the pressure off the more sensitive AONB landscape. To perform this task the SLA needs policies that will ensure it remains attractive. It is therefore appropriate to treat SLAs in the same way as nationally designated landscapes in the JLDP in respect of Policy ADN1.

j) In the light of GeoMon Global Geopark and the recent planning application for the Rhyd y Groes wind farm. It is essential that provision is made in the JLDP to ensure the removal of obsolete wind turbines from the landscape. In the case of Rhyd y Groes permission has been granted to erect 11 new large wind turbines near to the existing wind farm. This was seen by the County Council as being the only way to secure the removal of the existing smaller 24 turbines, which are coming to the end of their life or are already obsolete. The new application was promoted by the developers as a "re-power" but in fact the turbines will be built on greenfield land because they require much deeper concrete foundations. The existing foundations will remain in the ground with only superficial restoration to provide some top soil. This is not an example of sustainable development. The possibility of large disintegrating and dangerous turbine structures being abandoned in the landscape when landowners or developers fail to remove them is already an issue for Anglesey.

Policy ADN1 vii) needs to include the addition of a bond deposited with the LPA to cover the costs of demolition and restoration. A planning condition alone may have no effective force.

k) Wind energy technology is a highly dispersed form of development where the turbines and associated poles and pylons required for electricity transmission and distribution are all intrusive elements in the landscape. There is a very large number of structures and amount of land required to enable the generation of a small amount of electricity. The late Chief Scientist for DECC professor David MacKay set out the comparative land take figures in various papers and lectures (available on Youtube), and in his seminal work 'Sustainable Energy Without the Hot Air'.

Source:-

<http://www.withouthotair.com/cft.pdf> and

<https://www.withouthotair.com/Electronic.html>

Although wind turbine technology has advanced and individual turbines can generate more power, this is primarily because they are much bigger structures. These new even larger super-sized industrial structures are even more incongruous in Anglesey's comparatively flat rural landscape. They require more land per turbine to be able to cope with the greater turbulence and wake generated by the larger blades.

Productive land is also lost to substations, roadways and reliable back-up power stations.

Policy ADN1 is therefore not sustainable. The criteria are too permissive of wind energy developments. The area of potential land loss and landscape destruction is too great.

l) Good quality landscapes help deliver good health and well-being. We know there was an issue with AM noise at Rhyd y Groes windfarm, as the site is referred to in ETSU-R-97 (albeit with incorrect geographical data - it is in the north of Ynys Mon). Please find attached 6 pages from the original ETSU-R-97, which references Rhyd-y-Groes as the source of complaints. The complete ETSU-R-97 can be downloaded at this link:

[http://www.hayesmckenzie.co.uk/downloads/ETSU%20Full%20copy%20\(Searchable\).pdf](http://www.hayesmckenzie.co.uk/downloads/ETSU%20Full%20copy%20(Searchable).pdf)

There is currently a noise issue at the nearby Ysgellog wind turbines.

m) The UK Government is looking at the question of wind turbine AM noise as there is no method within the current guidance to deal with excessive AM noise. DECC took evidence from the Independent Noise Working Group:-

https://www.heatonharris.com/sites/www.heatonharris.com/files/inwg_am_s_tudytor_30oct2014_final.pdf

In an answer to questions raised by Chris Heaton-Harris MP during the Energy Bill debate on 14 March 2016 the Minister of State, Department of Energy and Climate Change, Andrea Leadsom confirmed that:-

“I thank my hon. Friend the Member for Daventry, my hon. Friends the Members for Peterborough (Mr Jackson) and for South Cambridgeshire (Heidi Allen), and my right hon. Friend the Member for Haltemprice and Howden (Mr Davis) for raising with me the important issues around visual, amenity and noise impacts from onshore wind farms and the impact that they can have at local level. I can confirm that our manifesto commitment specifically called for a halt to the spread of onshore wind farms and a change in the law so that local people have the final say on wind farm applications. We are making sure that people’s concerns are addressed. Specifically, the Government are considering measures related to noise and amplitude modulation. We touched on this matter in Committee. As I said then, we are determined to address this and find a solution to the problem. This is possibly taking longer than my hon. Friends would like, but we are taking independent advice and will consider how best to act in the light of that advice, which I expect to receive shortly. At this stage, I cannot comment further, but I hope that my hon. Friend the Member for Daventry will continue to be patient with me in the knowledge that we are looking at this very closely.”

Source:-

http://www.publications.parliament.uk/pa/cm201516/cmhansrd/cm160314/d_ebtext/160314-0001.htm#16031410000003

n) The Isle of Anglesey County Council would be failing in its duty of care and public protection, if it does not take into account the evidence of detrimental AM noise emissions from wind turbines and the fact that this matter is currently being dealt with by the UK Government. The Well-being of Future Generations (Wales) Act 2015 places further duties on the local planning authority in respect of public protection and promotion of healthy living and environments. The Council would lay itself open to legal action, if it fails to properly consider potential harm arising from AM noise.

Policy ADN1 should make provision for new wind turbine developments to be subject to any upcoming new law or guidance concerning noise emissions and

for the public liability to be placed on developers, landowners, owners and operators.

o) To take account of the objections raised to the Deposit Plan and to the points above the size of new wind turbines permitted on Ynys Mon should not be greater than 15 metres.

RENEWABLE ENERGY Agenda item 7.

3) The Background Paper Renewable Energy Study; and the Appendices A,B,C,CH,D; and the proposal to introduce a new part to policy ADN2 were only put into the public domain via their inclusion on the JLDP Examination portal in the last few days.

It is essential that there be a public consultation around these additions and changes.

a) There are many issues to consider in respect of solar farms, including the large requirement for land and the consequent change to landscape character.

Dr Ben Britton, Lecturer/RAEng Research Fellow, Director of MSc in Advanced Nuclear Engineering in Department of Materials, has recently given a comparative example between nuclear power and solar farms saying:-

“To contextualise the scale of the Hinkley project – it is approximately equivalent to a solar farm that takes up an area the size of the Isle of Wight.”

Source:-

http://www3.imperial.ac.uk/newsandeventspggrp/imperialcollege/newssummary/news_2-8-2016-14-28-7

To put this in a local context, there is a 49.99MW application for a solar farm at Rhyd y Groes which will take up an area of land roughly equivalent in size to the nearby town of Cemaes.

There are other ways of using solar power and there are renewables that have a much smaller footprint.

b) We can also look to other types of low carbon energy such as molten salt 'walk away safe' small modular nuclear reactors (SMRs). This is a fast developing technology:-

<http://www.zmescience.com/ecology/what-is-molten-salt-reactor-424343/>

The expectation is that molten salt smrs will be available within the next decade i.e within the timeframe of this plan. They are being developed beyond the prototype towards a commercial product that the UK company Moltex says will be cheaper than other power sources:-

<http://analysis.nuclearenergyinsider.com/moltex-energy-sees-uk-canada-smr-licensing-springboard-asia#.V3QuUsYEaA8.twitter>

This technology has been the focus of a recent report produced by the Welsh Affairs Committee:-

<http://www.publications.parliament.uk/pa/cm201617/cmselect/cmwelaf/129/12902.htm>

Gwynedd and Anglesey Councils gave evidence to the Committee and are very supportive of smr technology being developed here. The advantage of an smr is that the modules can be built in different sizes to produce between 30 and 300MWe. A 50MWe module is about the size of a large container. The new Rhyd y Groes wind farm has a potential capacity of around 9.9MW and is spread over hundreds of acres. A molten salt reactor is passively safe technology, produces a reliable power supply and around 85% less waste, which is less toxic and therefore needs storage for a comparatively short time. Some designs will reduce stockpiles of existing waste as they have the ability to re-cycle the waste using it for fuel, producing a more sustainable source of nuclear power.

In the light of rapid progress towards smr technology there is little point in littering the JLDP area with technologies which are unsustainable and damaging to the landscape. This new option, for production of low carbon energy, is one which should now be considered as part of the JLDP process.

In the light of new technology wind turbine developments are effectively yesterday's technology serving no useful purposes from here on, except perhaps at the domestic scale. Policy ADN1 should be amended accordingly.