

9<sup>th</sup> March 2017

**CPRW Anglesey Branch Response to the Joint Local Development Plan  
'Matters Arising Changes' –Written Statement.**

<http://www.anglesey.gov.uk/Journals/y/d/o/NMC-Schedule-Written-Statement.pdf>

We object to the inclusion in the JLDP of the following:-

1. pdf page 60 - the new paragraph shown in blue below:-

*“NMC 93 The “Renewable Energy Opportunities Study – towards renewable energy target” (2016) has evaluated the potential energy capacity of renewable and low carbon energy Technologies in the Plan area and the rest of Gwynedd. Developers are encouraged to explore all aspects of the Plan area’s capacity to contribute to reducing national carbon emissions within the energy sector. Planning permission is not required for some micro-generation Technologies under the General Permitted Development Order. It is suggested that applicants should look at part 40 and part 43 of the Order and take advantage of pre-application enquiry service, which is available from both Councils.”*

2. pdf page 60 - the altered paragraph shown in blue below:-

*“NMC 94 In 2012 Renewable Energy Capacity Studies were prepared for Gwynedd (county) and Anglesey to assess the potential capacity for renewable sources of energy. The purpose of the Studies was to help each Council understand the potential resources from each renewable energy technology. The Studies considered a number of on-shore technologies, e.g. onshore wind, hydropower, biomass. Off-shore resources were acknowledged in the Studies but they do not contribute to the renewable energy capacity figures of the Plan area. The Studies were updated during 2016 (Potential Renewable Energy Study – towards renewable energy targets”. ~~In September 2015 the Welsh Government provided an updated ‘Practice Guidance: Planning for Renewable and Low Carbon Energy – A Toolkit for Planners’. This had an additional section on how to assess the potential for solar farm developments. A letter dated the 10 December 2015 by the Minister for Natural Resources stated his expectations for energy policies in LDPs. He expects allocations or identification of areas of search for local authority scale (5MW to 25MW) renewable energy schemes or other low carbon technologies. In light of this the Councils have commissioned additional work to ascertain any potential areas for solar farm development. In addition an assessment against the areas Landscape Sensitivity and Capacity Study will ascertain whether any local authority scale areas of search should be identified in the Plan. The Studies estimate that approximately 37.8% of the total electricity demand is currently provided by renewable electricity. However, although heat demand is significant, there is no evidence of any renewable heat supply in the area to date.”~~*

3. pdf page 61.

**NMC95** and NMC 96 including **Table 12A – Renewable Electricity Potential for 2026.**

4. pdf page 253 in respect of renewable energy targets.  
NMC 323 Local Indicator D21 as copied in blue shown below:-

*“D21 Number of planning applications for standalone renewable energy development granted, per technology, area (Anglesey and Gwynedd Local Planning Authority area) and recorded energy output (GWh)*

*To meet 50% (1,123.35 GWh) of projected electricity demand through renewable energy sources by 2021  
To meet 100% (2,246.7 GWh) of projected electricity demand through renewable energy sources by 2026  
To meet 50% (26.397 GWh) of projected heat demand through renewable energy sources by 2021  
To meet 100% (52.795 GWh) of projected heat demand through renewable energy sources by 2026”*

**We object to the inclusion of these matters Arising Changes ( i.e. NMC93; NMC94; NMC95 and NMC96) as a basis for assuming that there should be a target of 50% of local electricity and heat provided by renewables by 2021 rising to 100% by 2026, (as per the amendments to the Monitoring Framework, pdf page 253).**

**There is no credible evidence for suggesting that this target can be met. The contribution to the UK’s electricity supply from renewables is currently around 25%. Approximately half of this (i.e 12%) comes from the heavily subsidised conversion of Drax power station which has been converted from burning coal to burning wood pellets imported from the US. Approximately half of the rest (i.e. 7%) comes from heavily subsidised offshore wind and the remaining 6% comes from heavily subsidised onshore wind and solar pv.**

**There is robust evidence that**

**a) this level of subsidy is pushing up power bills to industry, business and households:-**

**<http://www.bbc.co.uk/news/business-39192297>**

**[https://www.publications.parliament.uk/pa/ld201617/ldselect/ldconaf/113/11303.htm#\\_idTextAnchor003](https://www.publications.parliament.uk/pa/ld201617/ldselect/ldconaf/113/11303.htm#_idTextAnchor003)**

**<https://www.publications.parliament.uk/pa/ld201617/ldselect/ldconaf/113/11302.htm>**

**b) is increasing the number of people in fuel poverty**

- c) leading to the relocation outside the UK of manufacturing and other energy intensive industries
- d) there is a consequent loss of jobs and skills in Wales
- e) when goods and food are produced abroad and then transported to Wales/UK for consumption there are more GHG emissions than if those products were made in the UK
- f) that new reliable back up power stations for intermittent renewables are not being built unless they too are given generous subsidy

So the objective of reducing carbon emissions is not met by intermittent renewables.

This plan is only concerned with “Land Use” planning. Therefore it does not include policies for the provision of reliable and predictable sources of marine energy, such as tidal power. Without the contribution that marine energy could make there is no evidence to support the aspiration to deliver a reliable supply of 100% of electricity and heat from land based renewables on Anglesey by 2026.

The plan needs to better address “the most efficient and effective use of land in the public interest” and “ensure necessary services and facilities are built where they are most needed”. It should do this by focussing on “low environmental impact developments” and by placing solar pv and solar thermal installations within the built environment and close to the place where the energy is needed and where the energy generated will be most effectively and efficiently used. Further research, by for example the BRE, is also needed:- <http://www.cardiff.ac.uk/bre-trust-centre-sustainable-engineering/research>

The plan should also address other means of achieving energy efficiency and cheaper power for business and communities:- <http://www.gateshead.gov.uk/Building%20and%20Development/Regeneration/GatesheadCentre/Gateshead-Town-Centre-District-Energy-Scheme/Gateshead-Town-centre-District-Energy-Scheme.aspx>

The plan should also recognise that under the new devolution settlement, the Welsh Government is about to gain control of energy generation opportunities up to 300MW. There is no mention of Small Modular Nuclear Reactors (SMR) in the plan, despite this being a low carbon land based power option, which has local support.

SMRs in the 30MW to 300MW range are currently being developed in various countries around the world including in the US, by for example NuScale, and these could be developed in the UK during the period covered by this plan:- <http://www.bbc.co.uk/news/uk-wales-north-west-wales-39085496>

There are also much safer Molten Salt SMRs in early stage development in several countries including by Moltex Energy in the UK and by Terrestrial Energy and Transatomic Power in Canada and the US:- <http://analysis.nuclearenergyinsider.com/terrestrial-energy-unveil-us-smr-site-supplier-plans-2017>

<https://www.nei.org/News-Media/News/News-Archives/ORNL-Verifies-Performance-of-Transatomic-s-Advance>

In our evidence to the Inspectors last autumn CPRW explained that there is now a growing body of independent verification showing that the costs of SMRs are often less than most other forms of energy including renewables. Moltex Energy makes this claim and has submitted its capital and operational costings to the UK government.

<http://www.energyprocessdevelopments.com/index.html>

Transatomic Power have recently undertaken a similar costings/verification exercise:-

<http://www.transatomicpower.com/wp-content/uploads/2015/04/TAP-White-Paper-v2.1.pdf>

There has been no consideration of SMRs during the process of drawing up this JLDP, despite the obvious potential for flexible, safe, reliable low carbon power generation. SMRs can be utilised to power industry and district heating facilities and to support intermittent renewables. The plan is not sound if it fails to consider all the options, especially those options capable of supporting intermittent renewables and industrial processes.

The volume of additions, such as for policy ADN1A and ADN2, at this late stage of the JDLP process means that there has been inadequate public consultation and too little consideration of the unintended consequences of imposing new renewable energy policies and targets. In our opinion this makes the chapters and policies on renewable energy unsound.

████████████████████

Chair Anglesey Branch CPRW

████████████████████

████████████████████

████████████████████

████████████████████