



SP MANWEB

The North Wales Wind Farms Connection Project

Environmental Statement Chapter 5 - Planning Considerations

Application reference: EN020014

March 2015



Regulation reference: The Infrastructure Planning
(Applications: Prescribed Forms and Procedure)
Regulations 2009 Regulation 5(2)(a)

Document reference 6.5

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PINS Reference: EN020014

Document Reference: 6.5

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 – Regulation 5(2)(a)

The Planning Act 2008

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Regulations 2009**

Regulation 5(2)(a)

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Environmental Statement

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Document Reference No.	6.5
Regulation No.	Regulation 5(2)(a)
Author	Gillespies
Date	March 2015
Version	01
Planning Inspectorate Reference No.	EN020014

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Environmental Statement Documents

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This Chapter does not have any Appendices:

Reference is also made to the following documents:

DCO Document Reference	Document
2.4	Access and Rights of Way Plans
5.3	Flood Consequence Assessment
5.7	'No Significant Effects' Report
6.18	Construction Environmental Management Plan (Appendix 2.1 to this ES)
7.4	Planning Statement
7.5	Appraisal of the North Wales Wind Farms Connection Project Against National Policy Statement for Electricity Networks Infrastructure (NPS EN-5) In Relation to Undergrounding (Appendix 1 to the Planning Statement)

5 PLANNING POLICY CONSIDERATIONS

5.1 Introduction

- 5.1.1 The purpose of this chapter is to set out the relevant European and national legislation and the European, national and local policies that provide the context for and are considered relevant to the environmental assessment of the Proposed Development.
- 5.1.2 The DCO application is also supported by a Planning Statement (DCO Document Ref 7.4). This document provides a more comprehensive review of planning policy in relation to the Proposed Development and considers compliance with that planning policy.
- 5.1.3 Planning policies and guidance are provided at UK, Wales and local level. Consideration has been given to those planning policies referred to in this chapter together with the specific planning policies which are relevant to the environmental topics covered in this ES and summarised in the specialist topic chapters.

5.2 European Obligations and UK Energy Policy

- 5.2.1 The policies outlined below set out relevant European obligations, and explain the government's position, on the need for: renewable energy; a diverse energy mix; and maintaining a secure and reliable supply of electricity as the UK makes the transition to a low carbon economy while achieving its climate change goals.

Directive 2009/28/EC

- 5.2.2 Directive 2009/28/EC on the promotion of the use of energy from renewable sources amended and repealed the 2001 Renewables Directive (2001/77/EC). It is part of a package of energy and climate change legislation that provides the legislative framework for community targets for greenhouse gas emission savings. The Directive establishes a common framework for the production and promotion of energy from renewable sources. The Directive sets a target for the UK to achieve 15% of its total energy consumption, including transport, from renewable sources by 2020.

Decision No 406/2009/EC

- 5.2.3 Decision No 406/2009/EC of the European Parliament and of the Council of 23 April 2009 established annual binding greenhouse gas emission targets for EU member states for the period 2013–2020. Member states shall reduce greenhouse gas emissions between 2013 and 2020 according to a linear trajectory, with binding annual targets following a straight line between a defined starting point in 2013 and end point in 2020. Under this decision, the UK must achieve a 16% reduction in greenhouse gas emissions by 2020, compared to 2005 emissions levels.

UK Renewable Energy Strategy, 2009 (UK RES)

- 5.2.4 The UK RES sets out the means by which the UK can meet the legally binding target of 15% of energy consumption from renewable sources by 2020. The UK RES contains a 'lead scenario', which suggests that more than 30% of electricity should be generated from renewables in the UK by 2020; a considerable increase from approximately 10.4% in 2012. The majority of this is expected to come from onshore and offshore wind power.
- 5.2.5 At paragraphs 3.1 and 3.5 of the UK RES, a commitment is made by government, and placed on providers to enable 'swifter delivery' of grid connection. Sub-paragraph 3 of paragraph 3.6 focusses upon 'quicker, smarter grid connection'; making the commitment to 'invest in and manage the electricity grid so that new renewable and other forms of generation can connect when they need and on the terms they need.'
- 5.2.6 Paragraph 4.97 recognises that '*constraints on access to the electricity grid represent a major challenge for both existing and future renewable generation projects.*' Paragraph 4.98 recognises that most of the new electricity generation will come from wind power projects. '*Since these are generally sourced far from areas of demand, we will need to ensure significant new investment in transmission infrastructure.*' Recognising, at paragraph 4.99, that '*transmission access is one of the main barriers to renewable deployment*'; paragraph 4.105 advises that '*the Government is working with Ofgem and industry to ensure that the right grid infrastructure is in place to connect all the forms of new generation that the UK will need to achieve our climate change and energy goals.*'
- 5.2.7 The UK RES also recognises that there will be a need for balancing the impact from renewable energy schemes with the benefits provided by them. Paragraph 4.61 advises that '*tackling climate change is vital for protecting our natural environment. If unchecked the impacts will be severe. Actions to address climate change can bring other environmental benefits. However, some measures can bring impacts on the environment by disturbing local habitats or causing local air pollution. Complying with the existing safeguards to protect the environment must remain a vital element of any development, but seen within the wider and long-term context of reducing carbon emissions and improving the security of energy supply.*'

UK Low Carbon Transition Plan, 2009 (UK LCTP)

- 5.2.8 The UK LCTP seeks to deliver significant greenhouse gas emissions reductions for the UK. The target is for a reduction of 18% on 2008 levels by 2020 and over a third of a reduction on 1990 levels. The UK LCTP also seeks to ensure that the UK will secure 40% of its electricity from low carbon sources by 2020, with approximately 30% of UK electricity generated from renewable sources in the same timescale.

5.2.9 Chapter 3, Transforming our Power Sector, recognises the need for a bigger, smarter and more dependable electricity grid so that renewable and other low carbon generation can connect to it when needed. It identifies the need for planning to support renewables deployment (page 61) (including reference to the now designated National Policy Statements). The UK LCTP advises (page 68), that ‘Government needs to ensure that the grid is able to respond to the pressures for connecting the new power stations under construction in a timely way.’ This will be achieved, not least, through more investment in the existing grid. The UK LCTP (page 69), recognises that ‘a key element of the future energy system is the network infrastructure required to support and match the demand for and supply of electricity.’

The Carbon Plan and the Carbon Plan – Delivering Our Low Carbon Future, 2011

5.2.10 The Carbon Plan (undated) sets out a vision of a changed Britain, powered by cleaner energy used more efficiently in our homes and businesses, with more secure energy supplies and more stable energy prices, benefiting from the jobs and growth that a low carbon economy will bring.

5.2.11 Paragraph 2.14 advises that *‘the electricity grid allows us to transport power from where it is generated to the end user... It is a fundamental asset and vital to the UK’s economic and national security.’* Paragraph 2.15 commits to *‘...working to ensure that the right framework is in place for the investment that will be needed in our grid infrastructure ... so that the grid has the capacity and capability to deal with energy demand ...’*

5.2.12 The Carbon Plan - Delivering our low carbon future, 2011 ‘sets out how the UK will achieve decarbonisation within the framework of our energy policy: to make the transition to a low carbon economy while maintaining energy security, and minimising costs to consumers...’ (paragraph 1). The Vision, presented at paragraph 10, identifies that ‘the electricity grid will be larger and smarter at balancing demand and supply.’

5.2.13 Paragraph 2.170 advises that the *‘Government’s immediate focus for renewables is on delivery.’* Targeted actions include *‘facilitating access to the electricity grid’ enabling reformed grid access and ‘... working to ensure the delivery of new onshore grid investment ...’*

Energy Act 2013

5.2.14 The Energy Act received Royal Assent on 18 December 2013. This Act will establish a legislative framework for delivering secure, affordable and low carbon energy and includes provisions on decarbonisation of the electricity sector. :

Annual Energy Statement 2014

5.2.15 In October 2014, the Secretary of State for Energy and Climate Change delivered the Government’s latest Annual Energy Statement to Parliament, the Annual Energy Statement, 2014. The Government has set three clear priorities in delivering the UK’s energy policies in the near term, the third of which is *‘reducing carbon emissions in order to mitigate climate change’.*

5.3 UK Planning Policy & Legislation

National Policy Statements

- 5.3.1 As outlined in Chapter 1 'Introduction', the Act defines the construction of an above ground transmission connection of 132kV or above as being an NSIP.
- 5.3.2 National Policy Statements (NPSs) set out Government policy for the delivery of major energy infrastructure and are of primary importance to the decision making process for NSIPs.
- 5.3.3 Section 104 of the Planning Act 2008 states:
- (2) In deciding the application the Secretary of State must have regard to -*
- (a) any national policy statement which has effect in relation to development of the description to which the application relates (a "relevant national policy statement")*
- And
- (3) The Secretary of State must decide the application in accordance with any relevant national policy statement, except to the extent that one or more of subsections (4) to (8) applies.*
- 5.3.4 Six National Policy Statements for energy infrastructure were designated by the Secretary of State for Energy and Climate Change in July 2011. The most relevant NPSs for transmission infrastructure are the Overarching National Policy Statement for Energy (EN-1)¹ the National Policy Statement for Renewable Energy Infrastructure (EN-3)² and the National Policy Statement for Electricity Networks Infrastructure (EN-5)³ (which must be read in conjunction with EN-1).

NPS EN-1

- 5.3.5 NPS EN-1 notes that the Government's objectives for energy and climate change will require further diversification of the UK's energy sources and much greater use of renewable and other low carbon forms of generation. It is estimated that there will be a need for about 59GW net of new capacity by 2025, of which 33GW would need to come from renewable sources to meet renewable energy commitments (para 3.3.22). It notes that;

"Lack of sufficiently robust electricity networks can cause, or contribute to, large scale interruptions. Existing transmission and distribution networks will have to evolve and adapt in various ways to handle increases in demand, but construction of new lines of 132 kV and above will also be needed to meet the significant national need for expansion and reinforcement of the UK's transmission and distribution networks" (para 3.7.2).

¹ Department for Energy and Climate Change : Overarching Energy National Policy Statement (EN-1): July 2011

² Department for Energy and Climate Change: National Policy Statement for Renewable Energy Infrastructure (EN-3): (July 2011)

³ Department for Energy and Climate Change: National Policy Statement for Electricity Energy Infrastructure (EN-5): July 2011

- 5.3.6 The NPS states that a 'smarter' electricity grid will be needed to support a more complex system of electricity supply and demand with generation occurring in a greater diversity of locations. It notes that;
- "new lines will have to be built, and the location of renewable energy sources and designated sites for new nuclear power stations makes it inevitable that a significant proportion of those new lines will have to cross areas where there is little or no transmission infrastructure at present, or which it may be claimed should be protected from such intrusions"*
- 5.3.7 It emphasises that;
- "the urgency of need for new generating capacity means that the need for new transmission infrastructure that is required to connect that capacity will be similar"* (para 3.7.7).
- 5.3.8 The Proposed Development is required to connect new renewable energy generation to the electricity transmission network it therefore supports the objectives of EN-1.
- 5.3.9 Part 4 of NPS EN-1 sets out general policies in accordance with which applications relating to energy infrastructure are to be decide. Its states that:
- "In considering any proposed development, and in particular when weighing its adverse impacts against its benefits, the IPC should take into account:*
- *Its potential benefits including its contribution to meeting the need for energy infrastructure, job creation and any long term or wider benefits; and*
 - *Its potential adverse impacts, including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts.*
- In this context, the IPC should take into account environmental, social and economic benefits and adverse impacts at national, regional and local levels.* (para 4.1.2 and 4.1.4)
- 5.3.10 NPS EN-1 (para 4.1.5) references development plan policies as being 'other matters' which could potentially be taken into account by the relevant decision making authority in determining a DCO application:
- "... matters that [the decision maker] may consider both important and relevant to its decision making may include Development Plan Documents or other documents in the Local Development Framework. In the event of a conflict between these or any other documents and an NPS, the NPS prevails for the purposes of ... decision making given the national significance of the infrastructure"*.
- 5.3.11 Section 5.5 of this Chapter provides an overview of the local planning policies and notes how the environmental assessment addresses their requirements.

5.3.12 NPS EN-1 states that:

“All proposals for projects that are subject to the European Environmental Impact Assessment Directive must be accompanied by an Environmental Statement (ES) describing the aspects of the environment likely to be significantly affected by the project” (para 4.2.1).

5.3.13 NPS EN-1 sets out additional matters which the Secretary of State must consider in his determination process. They include the matters summarised in Table 5.1 below:

Table 5.1: Other Matters Identified for Consideration ES (NPS EN-1)

Issue	Project Document
<p>Para 4.2.3 states that <i>‘For the purposes of this NPS and the technology-specific NPSs the ES should cover the environmental, social and economic effects arising from the pre-construction, construction, operation and decommissioning of the project</i></p>	<p>DCO Documents 6.1 – 6.28 provide the ES for the North Wales Wind Farms Connections Project.</p>
<p>Para 4.3.1 states that <i>‘Prior to granting a development consent order the IPC must, under the Habitats and Species Regulations...consider where the project may have a significant effect on a European site...Applicants should also refer to Section 5.3 of this NPS on biodiversity and geological conservation’.</i></p>	<p>Chapter 4 ‘Alternatives and Design Evolution’ and Chapter 7 ‘Biodiversity and Geological Conservation’ of this ES and the ‘No Significant Effects Report (DCO Document Ref 5.7) demonstrate how consideration has been given to potential effects on European sites.</p> <p>Overall it is considered that the Proposed Development will not have an adverse effect on any European site of nature conservation importance</p>
<p>Para 4.4.1 confirms that <i>‘this NPS does not contain any general requirement to consider alternatives....However applicants are obliged to include their ES ...information about the main alternatives they have studied’.</i></p>	<p>Chapter 4 ‘Alternatives and Design Evolution’ describes how the Proposed Development has developed and the alternatives considered.</p>
<p>Section 4.5 of the NPS deals with good design for energy infrastructure.</p> <p><i>‘applicants should be able to demonstrate ... how the design process was conducted and how the proposed design evolved.’ (para 4.5.4).</i></p>	<p>Chapter 4 ‘Alternatives and Design Evolution’ describes how the Proposed Development has developed and the alternatives considered.</p> <p>The wood pole design proposed is preferred as technically feasible, less</p>

Issue	Project Document
	visually intrusive, less likely to be visible on the skyline and more flexible for routeing, thereby providing a better fit with the landscape.

- 5.3.14 Part 5 of the NPS goes on to identify the generic impacts which should be considered. The table below identifies these potential impacts and identifies where in this ES the information can be found:

Table 5.2: Generic Impacts to be Considered in an ES (NPS EN-1)

Generic Impact (NPS EN-1)	Location within ES
Air quality and emissions	Air quality, noise and waste are covered in Chapter 13 'Emissions' (DCO Document Ref 6.13). The SoS agreed that air quality and noise effects during the operational phase could be scoped out (see Chapter 4 of this ES 'EIA Methodology' (DCO Document Ref 6.4).
Biodiversity and geological conservation	Addressed in Chapter 6 'Ecology and Biodiversity' (DCO Document Ref 6.6) and Chapter 10 'Land Use and Agriculture' (DCO Document Ref 6.10) of this ES respectively.
Dust	Information on the practices that will be adopted in order to reduce potential impacts associated with dust are incorporated within the Construction Environmental Management Plan (Appendix 2.1 (DCO Document Ref 6.18)). This document has informed Chapter 13 (DCO Document Ref 6.13) of this ES 'Emissions'.
Flood risk	Information is presented in Chapter 9 'Flood Risk and Water Quality' of this ES, and within the Flood Consequence Assessment (DCO Document Ref 5.3)
Historic Environment	Addressed in Chapter 8 'Historic Environment' (DCO Document Ref 6.8) of this ES.

Generic Impact (NPS EN-1)	Location within ES
Landscape and visual	Addressed in Chapter 7 'Landscape and Visual' (DCO Document Ref 6.7) of this ES.
Land Use	Information is presented in Chapter 10 (DCO Document Ref 6.10) of this ES
Noise and vibration	As noted above information is presented in Chapter 13 'Emissions' (DCO Document Ref 6.13)
Socio-economic	Addressed in Chapter 11 of this ES (DCO Document Ref 6.11).
Traffic and transport	Information is include within Chapter 12 'Traffic and Transport (DCO Document Ref 6.12) of this ES.
Waste Management	Addressed in Chapter 13 'Emissions' of this ES (DCO Document Ref 6.13)
Water quality and resources	As noted above information is presented in Chapter 9 'Flood Risk and Water Quality' (DCO Document Ref 6.9) of this ES.
EMFs	Chapter 14 (DCO Document Ref 6.14) of this ES provides an appraisal of EMFs.

5.3.15 Further information to demonstrate the Proposed Development's compliance with the requirements of EN-1 is provided within the Planning Statement (DCO Document Ref 7.4).

NPS EN-3

5.3.16 NPS EN-3 briefly refers to the grid connection needs of an onshore wind farm, directing applicants to consult NPS EN-1 for further details.

5.3.17 Para 2.7.8 states that connection of the '*proposed onshore wind farm to the relevant electricity network will be an important consideration for applicants.*' Para 2.7.9 recognises that 'most onshore wind farms are connected into the local distribution network at an intermediate voltage of 33, 66 or 132 kilovolts (kV).

NPS EN-5

- 5.3.18 National Policy Statement EN-5⁴ provides specific guidance relevant to 'electricity networks infrastructure' NSIPs.
- 5.3.19 NPS EN-5 notes that the general location of electricity network projects is often determined by the location, or anticipated location, of a particular generating station in relation to the existing network (para 2.2.2).
- 5.3.20 The NPS deals with the circumstances in which it is considered appropriate to consider a networks application separately from related proposals which may include proposed generating stations. These include where the project is wholly or substantially supported by connection agreements or contractual arrangements to provide the connection.
- 5.3.21 Chapter 2 'Description of the Proposed Development' notes that the Proposed Development is required to meet the connection agreements between SP Manweb and four consented wind farms.
- 5.3.22 NPS EN-5 (para 2.6.1) sets out additional technology specific considerations on the following generic impacts considered in EN-1(see Table 5.2 above). These are:
- Biodiversity and geological conservation;
 - Landscape and visual; and
 - Noise and vibration.
- 5.3.23 Consideration of these impacts, and the specific consideration set out in EN-5 is covered in the topic specific chapters of this ES.
- 5.3.24 With respect to biodiversity and geological conservation the NPS states that:
- ...“large birds such as swans and geese may collide with overhead lines associated with power infrastructure, particularly in poor visibility. Large birds in particular may also be electrocuted when landing or taking off by completing an electric circuit between live and ground wires”.* (para 2.7.1)
- And
- “The applicant will need to consider whether the proposed line will cause such problems at any point along its length and take his into consideration in the preparation of the Environmental Impact Assessment”.* (para 2.7.2).
- 5.3.25 Chapter 6 of this ES includes as assessment of the potential effects of the Proposed Development on birds.
- 5.3.26 Generic landscape and visual effects are covered in Section 5.9 of EN-1, Section 2.8 of EN-5 identifies specific considerations which apply to electricity networks infrastructure.

⁴ Department for Energy and Climate Change : National Policy Statement for Electricity Networks Infrastructure July 2011

5.3.27 Para 2.8.2 of EN-5 states that

“...new above ground electricity lines, whether supported by lattice steel towers/pylons or wooden poles, can give rise to adverse landscape and visual impacts, dependent upon their scale, siting, degree of screening and the nature of the landscape and local environment through which they are routed. For the most part these impacts can be mitigated, however at particularly sensitive locations the potential adverse landscape and visual impacts of an overhead line proposal may make it unacceptable in planning terms, taking account of the specific local environment and context”.

It goes on:

“Cumulative landscape and visual impacts can arise where new overhead lines are required along with other related developments such as substations, wind farms and/or other new sources of power generation”.

5.3.28 The potential landscape and visual effects of the Proposed Development are considered in Chapter 7 of this ES ‘Landscape and Visual’. The potential cumulative effects of the Proposed Development with the Wider Scheme and other developments in the vicinity (including the wind farms) are also considered in this chapter.

5.3.29 Para 2.8.4 goes on:

“Where possible, applicants should follow the principles below in designing the route of their overhead line proposals and it will be for applicants to offer constructive proposals for additional mitigation of the proposed overhead line. The ES should set out details of how consideration has been given to undergrounding or sub-sea cables as a way of mitigating such impacts, including, where these have not been adopted on grounds of additional cost, how the costs of mitigation have been calculated”.

5.3.30 Consideration has been given to other feasible means of making the connection and the costs and benefits of such (see Chapter 3 ‘Alternatives and Design Evolution’.

5.3.31 Para 2.8.5 of EN-5 references the Holford Rules, guidelines for the routing of new overhead lines, which were originally set out in 1959 by Lord Holford, and are intended as guidelines to the routing of new overhead lines. These guidelines were reviewed and updated by the industry in the 1990s and “*should be followed by developers when designing their proposals*” (Para 2.8.5).

5.3.32 Chapter 7 of this ES ‘Landscape and Visual’ demonstrates how the Holford Rules have influenced the routing and design of the Proposed Development.

5.3.33 The NPS goes on to state;

“... Government has not laid down any general rule about when an overhead line should be considered unacceptable. The IPC should, however only refuse consent for overhead line proposals in favour of an underground or subsea line if it is satisfied that the benefits from the non-overhead alternative will clearly outweigh any extra economic, social and environmental impacts and the technical difficulties are surmountable’ (para 2.8.9).

- 5.3.34 Consideration has been given to other feasible means of making the connection and the costs and benefits of such. In summary NPS EN-5 accepts overhead lines are not incompatible with licence operators' obligations to preserve the environment and that for the most part, adverse landscape and visual impacts can be mitigated. SP Manweb considers the wood pole design facilitates compliance with this obligation in that it result in lower impacts on the environment and enables more sensitive routeing through the landscape. EN-5 notes, however, that where there are serious concerns about the potential adverse landscape and visual impacts of a proposed overhead line, the decision maker will have to balance these against other factors including the need for the proposed infrastructure, the availability and cost of alternative routes, technical difficulties and likely costs of undergrounding, as well as the benefits and any impacts of undergrounding along any of the identified sections.
- 5.3.35 With the above in mind, SP Manweb has evaluated the Proposed Development against the approach set out in EN-5, referring to the assessment in Chapter 7 'Landscape and Visual' of this ES. In its assessment, SP Manweb also had regard comments received in response to consultation.
- 5.3.36 SP Manweb's evaluation is set out in the 'Appraisal of the North Wales Wind Farms Connection Project Against National Policy Statement for Electricity Networks Infrastructure (NPS EN-5) In Relation to Undergrounding' (Appendix 1 to the Planning Statement) (DCO Document Ref 7.5)).
- 5.3.37 With respect to noise and vibration (Section 2.9) the NPS states that:
- "Generic noise effects are covered in Section 5.11 of EN-1. In addition there are specific considerations which apply to electricity networks infrastructure."* (para 2.9.1)
- "All high voltage transmission lines have the potential to generate noise under certain conditions".* (para 2.9.2)
- 5.3.38 Chapter 13 'Emissions' includes an assessment of noise and vibration during construction. The SoS in the Scoping Opinion (para 3.74) agreed that operational noise effects could be scoped out of the EIA (Para 3.7.4).
- 5.3.39 With respect to EMFs the NPS (Section 2.10) notes that the ICNIRP has developed health protection guidelines⁵ for both public and occupational exposure (para 2.10.3), and that;
- "undergrounding of a line would reduce the level of EMFs experienced, but high magnetic field levels may still occur immediately above the cable"* and that *"It is not the Government's policy that power lines should be undergrounded solely for the purpose of reducing exposure to EMFs"* (para 2.10.12).
- 5.3.40 Chapter 14 of this ES provides an appraisal of EMFs.
- 5.3.41 Further information to demonstrate the Proposed Development's compliance with the requirements of EN-5 is provided within the Planning Statement (DCO Document Ref 7.4).

⁵ International Commission on Non-Ionising Radiation Protection : Guidelines for limiting exposure to time varying electric, magnetic and electromagnetic fields : 1998

5.4 Welsh National Planning Advice and Policies

5.4.1 Whilst the above NPSs are the overriding policies against which the proposals will be primarily considered, regard has also been had to Welsh Government policy.

5.4.2 In Wales, planning policy comprises both national (Welsh) and local policy documents.

Planning (Wales) Bill

5.4.3 The Welsh Government published its draft Planning (Wales) Bill and accompanying consultation package in December 2013, containing proposals to change the planning system in Wales through alteration to primary legislation, secondary legislation, policy and guidance. Subsequently, in October 2014, the Bill was introduced to the National Assembly for Wales. The target date for Royal Assent is summer 2015 after which the Bill will become an Act in Wales and will provide new planning legislation.

5.4.4 The Bill includes proposals for the formation of a National Development Framework (NDF). The NDF would have "Development Plan" status and provide the context for Local Development Plans. It would also identify key locations to accommodate change and infrastructure investment. The NDF will cover development and land use issues of national significance which the planning system is able to influence and deliver.

5.4.5 The NDF would provide Ministers with the context within which developments of significance are to be determined and would replace the Wales Spatial Plan.

5.4.6 The consultation on the draft Bill noted a desire by Welsh Government to review and rationalise the 22 Technical Advice Notes (TANs) and Minerals TANs. Certain elements covered in existing TANs (e.g. the Strategic Search Areas for major wind farms) would be incorporated into the NDF.

5.4.7 The Bill proposes setting a clear development hierarchy with developments of national significance determined by Ministers and major developments determined by the relevant local planning authority. In both cases there will be mandatory pre-application consultation.

Wales Spatial Plan

5.4.8 Section 60 of the Planning and Compulsory Purpose Act 2004 placed a duty on the National Assembly of Wales to prepare a spatial plan. Section 62 states that local planning authorities, in preparing a local development plan, must have regard to the Wales Spatial Plan (WSP).

5.4.9 The 2008 Wales Spatial Plan (WSP) provides a Wales-wide spatial strategy which outlines a 'broad 20 year agenda' to guide future development and policy interventions.

5.4.10 Para 1-5 advises that the purpose of the WSP is to ensure that what is done in the public, private and third sectors in Wales is integrated and sustainable, and that actions within an area support each other and jointly move towards a shared vision for Wales and for the different parts of Wales.

5.4.11 The WSP notes that 'a significant challenge' is the ability to have a local and a national role in responding and adapting to the impact of climate change.

Planning Policy Wales

5.4.12 Planning Policy Wales (Edition 7, July 2014) (PPW) sets out the land use planning policies of the Welsh Government and should be taken into account by local planning authorities in the preparation of development plans. It is supplemented by a series of Technical Advice Notes (TANs), which, with PPW, circulars and policy clarification letters comprise national planning policy in Wales.

5.4.13 In relation to planning for renewable energy development and associated 'grid' infrastructure at a local level, PPW states that:

"An integrated approach should be adopted towards planning renewable and low carbon energy developments and additional electricity grid network infrastructure. Additional electricity grid network infrastructure will be needed to support the SSAs and local planning authorities should facilitate grid developments when appropriate proposals come forward whether or not the wind farms are to be connected are located within their authorities." (para 12.8.14)

Technical Advice Notes

5.4.14 The consultation on the draft Planning Bill noted a desire by Welsh Government to review and rationalise Technical Advice Notes ("TANs"). However, they remain relevant planning policy and regard has been had to the existing TANs.

5.4.15 The TANs provide technical advice to supplement the policy set out in PPW. The TANs are also referred to within the individual topic chapters of the ES, where appropriate.

5.4.16 TANs considered to be relevant to the Proposed Development include:

- TAN 8: Renewable Energy (2005)

TAN 8 relates to the land use planning considerations of renewable energy in the context of UK and national energy policy. The provision of electricity from renewable sources is an important component of the UK energy policy.

TAN 8 states onshore wind power offers the greatest potential for an increase in the generation of electricity from renewable energy in the short to medium term. To try to meet the target for onshore wind production the Welsh Government has commissioned extensive technical work. This concluded that, for efficiency and environmental reasons amongst others, large scale (over 25 MW) onshore wind developments should be concentrated into particular areas defined as Strategic Search Areas (SSAs) (para 2.2).

TAN 8 also states that local planning authorities should consider the local availability of renewable energy resources and develop suitable policies that promote their implementation.

The 'Wind Farms' are located within SSA A as defined within TAN8.

- TAN 11: Noise (1997)

TAN 11 provides advice on how the planning system can be used to minimise the adverse impact of noise without placing onerous restrictions on development. It outlines the main considerations that local planning authorities should consider when producing their development plan policies and in determining planning applications.

Further consideration of the advice in TAN 11 is provided in Chapter 13 'Emissions'.

- TAN 12 Design (2014)

TAN 12: Design, which provides advice for all those involved in the design of development on how good sustainable design can be facilitated through the planning system.

Further consideration of the advice of TAN15 is provided in Chapter 7 'Landscape and Visual'.

- TAN 15: Development and Flood Risk (2004)

The overarching aim of TAN 15 is to direct new development away from those areas which are at high risk of flooding. Development will only be justified in higher risk areas if it can be demonstrated that the potential consequences of a flooding event for the particular type of development have been considered, and found to be acceptable.

Further consideration of the requirements of TAN15 is provided in Chapter 9 'Flood Risk and Water Quality' and the Flood Consequences Assessment (DCO Document Ref 5.3).

- TAN 18: Transport (1997)

Describes how to integrate land use and transport planning and explains how transport impacts should be assessed and mitigated.

The assessment of potential effects associated with traffic and transport is provided in Chapter 12 'Traffic and Transport' with reference to the guidance provided in TAN 18.

5.4.17 Further information to demonstrate the Proposed Development's consideration of the guidance provided in the Technical Advice Notes is provided in the Planning Statement (DCO Document Ref 7.4).

5.5 Local Planning Policy

5.5.1 As noted above NPS-EN1 (para 4.1.5) references development plan policies as being 'other matters' which could potentially be taken into account by the relevant decision making authority in determining a DCO application:

5.5.2 This section therefore summarises the relevant policies from the respective local development plans.

5.5.3 Denbighshire County Council formally adopted its Local Development Plan (LDP) at a meeting of the County Council on 4th June 2013. This now replaces the Denbighshire Unitary Development Plan (UDP).

- 5.5.4 The LDP includes a number of objectives, developed to address identified issues and needs within Denbighshire. The Plan identifies that these will need to be met in order to achieve the Vision for the County up to the year 2021. The Plan also includes a number of policies which are of relevance. These objectives and policies are summarised in the following table (Table 5.3).
- 5.5.5 Conwy County Borough Council adopted its Local Development Plan in October 2013. The Plan sets out the key challenges facing Conwy, identifies the Vision, Objectives and the Spatial Strategy for development in the area over the period 2007 to 2022. The LDP replaces existing Structure Plans and Local Plans which previously provided the policy framework for the Conwy Plan Area.
- 5.5.6 Adopted policies of relevance to individual topics from both LDPs are referred to within the specific topic chapters. Further consideration of planning policy is provided in the Planning Statement (DCO Document Ref 7.4).

Table 5.3: Summary of Local Planning Policies

Planning Policy	Assessment of the Proposed Development
Denbighshire County Council Local Development Plan	
Strategic Objectives	
<p>Objective 11 Energy - <i>“The Local Development Plan will ensure that Denbighshire makes a significant contribution to reducing greenhouse gases through ...supporting the principle of large wind farm development within identified zones and other suitable renewable energy technologies...”</i></p>	<p>The North Wales Wind Farms Connection Project provides a connection to take the electricity generated from four consented wind farms and deliver it to the national electricity transmission system via the Collector Substation and the existing SP Manweb substation at St Asaph.</p>
<p>Objective 16 Areas of Protection - <i>“The Local Development Plan will seek to protect and enhance the natural and built heritage of the County including aspects such as landscape, biodiversity, geo-diversity, designated sites and buildings and protected species”.</i></p>	<p>The development of the Proposed Development from the strategic options stage through to the detailed proposals which are the subject of the DCO application has considered the natural and built heritage of the area through which the connection is routed.</p> <p>The assessment of the effect of the Proposed Development on the natural and built heritage is included in this ES. The assessment demonstrates that the Proposed Development will protect the natural and built heritage.</p>
Promoting a Sustainable Economy	
<p>Policy PSE 15 - Safeguarding Minerals - <i>“High quality resources of minerals, including limestone, sand and gravel, Denbigh Gritstones, igneous and volcanic deposits will be safeguarded from development that would result in its permanent loss or hinder future extraction. Development will</i></p>	<p>The presence of potential mineral resources is not a key routing criterion and consequently resources have not been specifically avoided. In any event if plans to exploit the mineral resources are brought forward then typically the extraction can accommodate existing</p>

Planning Policy	Assessment of the Proposed Development
<p><i>only be permitted where:</i></p> <p><i>i) it can be demonstrated that the need for the development outweighs the need to protect the mineral resource; or</i></p> <p><i>ii) where such development would not have a significant impact on the viability of that mineral being worked; or</i></p> <p><i>iii) where the mineral is extracted prior to the development</i></p>	<p>overhead transmission. The magnitude of effect on mineral resources is related to the footprint required for an overhead line.</p> <p>Further information on safeguarded areas is provided in Chapter 10 'Land Use and Agriculture' of this ES.</p>
Valuing our Environment	
<p>Policy VOE 1 Key Areas of Importance - <i>The following areas will be protected from development that would adversely affect them. Development proposals should maintain and, wherever possible, enhance these areas for their characteristics, local distinctiveness, and value to local communities in Denbighshire:</i></p> <ul style="list-style-type: none"> - <i>Statutory designated sites for nature conservation;</i> - <i>Local areas designated or identified because of their natural landscape or biodiversity value;</i> - <i>Sites of built heritage; and</i> - <i>Historic Landscape, Parks and Gardens.</i> 	<p>The development of the Proposed Development from the strategic options through to the detailed proposals which are the subject of the DCO application has considered the natural and built heritage of the area through which the connection is routed.</p> <p>This has included consideration of both designated and non-designated sites for landscape and nature conservation as well as sites of built heritage. Chapter 6 of this ES has assessed the effect of the Proposed Development on statutory and locally designated sites for nature conservation. No statutory sites are affected and the assessment concludes that for locally designated sites that there are no likely significant effects.</p> <p>Chapter 8 'Cultural Heritage' identifies a potential effect on a listed building, and no significant effects on historic landscapes or parks and gardens.</p>
<p>Policy VOE 2 Areas of Outstanding Natural Beauty and Areas of Outstanding Beauty - <i>In determining development proposals within or affecting the Area of</i></p>	<p>The Proposed Development has avoided areas designated for their landscape quality (including AONBs and AOBs) and effects upon those areas have been</p>

Planning Policy	Assessment of the Proposed Development
<p><i>Outstanding Natural Beauty (AONB) and Area of Outstanding Beauty (AOB), development that would cause unacceptable harm to the character and appearance of the landscape and the reasons for designation will not be permitted.</i></p>	<p>minimised through careful routing of the connection.</p>
<p>Policy VOE 5 - Conservation of Natural Resources <i>“Development proposals that may have an impact on protected species or designated sites of nature conservation will be required to be supported by a biodiversity statement which must have regard to the County biodiversity aspiration for conservation, enhancement and restoration of habitats and species.</i></p> <p><i>If necessary, measures required to mitigate likely adverse effects on the qualifying features of statutory designated sites should be put in place prior to the commencement of development. Measures required to offset any likely adverse effects will be secured by planning conditions and/or planning obligations.</i></p> <p><i>Planning permission will not be granted for development proposals that are likely to cause significant harm to the qualifying features of internationally and nationally designated sites of nature conservation, priority habitats, priority species, regionally important geodiversity sites, or to species that are under threat.</i></p>	<p>The assessment of the Proposed Development in this ES has considered both designated and non-designated sites for nature conservation as well as protected species. Comprehensive surveys of habitats and species have been undertaken as part of the EIA and have further informed the detailed routing of the connection. ’</p> <p>The Proposed Development will not lead to any likely significant effects on the qualifying features of any internationally or nationally designated sites of nature conservation, priority species, geodiversity sites or species under threat. The closest internationally designated site to the Proposed Development is the Elwy Valley SAC. The North Wales Wind Farm Connections Project ‘No Significant Effects Report’ (DCO Document Ref 5.7) demonstrates that the Proposed Development will not cause a significant effect to the qualifying features.</p> <p>Further information is provided in Chapter 6 ‘Biodiversity, and Chapter 10 ‘Land Use and Agriculture’ of this ES.</p>
<p>Policy VOE 9: On-shore wind energy This policy relates to the provision and siting of renewable</p>	<p>The Proposed Development supports the provision of wind generation from the Clocaenog Strategic Search Area (SSA-A)</p>

Planning Policy	Assessment of the Proposed Development
<p>energy with Denbighshire. It recognises that the Clocaenog Strategic Search Area (SSA-A) has been identified at the national level (in Technical Advice Note 8) and is felt to offer the greatest potential in terms of the generation of energy from large scale wind turbines.</p>	
<p>Conway Council Local Development Plan</p>	
<p><i>Strategic Policies</i></p>	
<p><i>Strategic Policy NTE/1 The Natural Environment</i> – “<i>In seeking to support the wider economic and social needs of the Plan Area, the Council will seek to regulate development so as to conserve and, where possible, enhance the Plan Area’s natural environment, countryside and coastline. This will be achieved by:</i></p> <ul style="list-style-type: none"> a) <i>Safeguarding the Plan Area’s biodiversity, geology, habitats, history and landscapes through the protection and enhancement of sites of international, national, regional and local importance, ...,</i> d) <i>Working with developers to safeguard protected species and enhance their habitats;</i> e) <i>Seeking to minimise the loss of Grade 2 and 3a agricultural land to new development, in particular, in the east of the Urban Development Strategy Area,;</i> f) <i>Respecting, retaining or enhancing the local character and distinctiveness of the individual Special Landscape Areas; and</i> i) <i>Preventing, reducing or remedying all forms of pollution including air, light, noise, soil and water, in line with</i> 	<p>The Proposed Development from the strategic options through to the detailed proposals which are the subject of the DCO application has considered the natural environment of the area through which the connection is routed (see Chapter 4 ‘Alternatives and Design Evolution’).</p> <p>The assessment of the Proposed Development in this ES has considered both designated and non-designated sites for nature conservation as well as protected species. Comprehensive surveys of habitats and species have been undertaken as part of the EIA and have further informed the detailed routeing of the connection.</p> <p>The Proposed Development will not lead to any likely significant effects on the qualifying features of any internationally or nationally designated sites of nature conservation, priority species, geodiversity sites or species under threat. The closest internationally designated site to the proposed development is the Elwy Valley SAC. The North Wales Wind Farm Connections Project ‘No Significant Effects Report’ (DCO Document</p>

Planning Policy	Assessment of the Proposed Development
<p><i>Policy DP/6”.</i></p>	<p>Ref 5.7) demonstrates that the Proposed Development will not cause a significant effect to the qualifying features. Further information is provided in Chapter 6 'Ecology and Biodiversity' (DCO Document Ref 6.6).</p> <p>The proposed connection has been routed so that it is not in proximity to any designated landscapes or any Special Landscape Area and no significant effects are predicted. Further information is provided in Chapter 7 'Landscape and Visual' DCO Document Ref 6.7)</p> <p>Chapter 10 'Land Use and Agriculture' of this ES (DCO Document Ref 6.10) considers the potential effects on agricultural land. BMV land has been avoided by careful routeing.</p> <p>Emissions from the Proposed Development have been considered within Chapter 13 of this ES.</p> <p>A Construction Environmental Management Plan (CEMP) (DCO Document Ref 6.18) has also been prepared and is subject to a Requirement in the draft DCO. This identifies the measures to be used prior to and during construction and the various commitments being made to address environmental effects.</p> <p>Further information is provided in Chapter 6 'Ecology and Biodiversity', Chapter 7 'Landscape and Visual' Chapter 8 'Historic Environment' and Chapter 10 'Land Use and Agriculture' of this ES.</p>
<p>Strategic Policy CTH/1 Cultural Heritage – <i>“The council is committed to protecting and, where appropriate, enhancing its cultural and heritage assets. This will be achieved by:</i></p>	<p>The development of the Proposed Development has considered both the cultural and heritage assets within the area. Chapter 8 ('Historic Environment') this ES</p>

Planning Policy	Assessment of the Proposed Development
<p>a) <i>Ensuring that the location of new development on both allocated and windfall sites within the Plan Area will not have a significant adverse impact upon heritage assets.....</i></p> <p>b) <i>Recognising and respecting the value and character of heritage assets in the Plan Area</i></p> <p>c) <i>Seeking to preserve and, where appropriate, enhance conservation areas,..... historic landscapes, parks and gardens, listed buildings, scheduled ancient monuments and other areas of archaeological importance.....</i></p> <p><i>Protecting buildings and structures of local importance....</i></p>	<p>identifies the relevant heritage assets.</p> <p>Sensitive routeing of the connection has minimised potential effects on such assets and no significant adverse impacts are predicted. It is therefore concluded that the Proposed Development complies with this policy. '</p> <p>Further information is provided in Chapter 8 'Historic Environment' of this ES.</p>
<p>Strategic Policy MWS/1 Minerals And Waste – “<i>The Council will ensure that there is sufficient provision of mineral resources and waste management facilities, while safeguarding the natural and built environment by:</i></p> <p>d) <i>Safeguarding sand and gravel resources as identified on the proposals map in line with Policy MWS/3;</i></p>	<p>Presence of potential mineral resources is not a key routeing criterion and consequently resources have not been specifically avoided. However, even if plans to exploit the mineral resource are brought forward then typically the extraction can accommodate existing overhead transmission. The Proposed Development does not therefore affect the Safeguarded Area.</p> <p>Further information is provided in Chapter 10 'Land Use and Agriculture' of this ES.</p>
Natural Environment	
<p>Policy NTE/3 Biodiversity – <i>New development should aim to conserve and, where possible, enhance biodiversity through:</i></p> <p>d) <i>Sensitive siting; avoiding European protected sites or those of national or local importance;</i></p>	<p>The evolution of the Proposed Development has considered both designated and non-designated sites for nature conservation.</p> <p>Sensitive routeing of the connection has meant that the Proposed Development will not lead to any likely significant effects on the qualifying features of any</p>

Planning Policy	Assessment of the Proposed Development
<p>e) <i>Sensitive layout and design which avoids impacts or mitigates through an agreed programme for any identified adverse impact on biodiversity;...</i></p>	<p>internationally or nationally designated sites of nature conservation. Comprehensive surveys of habitats and species have been undertaken as part of the EIA and have further informed the detailed routeing of the connection.</p> <p>Further information is provided in Chapter 6 'Biodiversity and Geological Conservation' of this ES.</p>
<p>Policy NTE/4 – The Landscape And Protecting Special Landscape Areas</p> <p>1 <i>Special Landscape Areas are ... designated in the following locations:</i></p> <p>d) <i>Elwy and Aled Valleys</i></p> <p>2 <i>In order to conserve the attributes of the Special Landscape Areas development proposals will have to show particular regard to the character of each locality in order to minimise their impact. Development will only be permitted if it is shown to be capable of being satisfactorily integrated into the landscape. In appropriate cases planning applications should be accompanied by a Landscape and Visual Impact Assessment to assess the visual and landscape impacts of the development.</i></p> <p>3 <i>All proposals, both within and outside SLAs, will be considered against the Development Principles and other policies in the Plan designed to protect the environment and landscape character.</i></p>	<p>The Proposed Development is located beyond the boundaries of the SLA and no significant effects are predicted.</p> <p>Chapter 7 'Landscape and Visual' of this ES includes an LVIA of the proposals and demonstrates that there are no significant effects on the Elwy Valley SLA. It is considered that the Proposed Development, will satisfactorily integrate into the landscape. This has been achieved by carefully choosing the route alignment and use of appropriate mitigation measures.</p>
<p>Policy NTE/7 – Onshore Wind Turbine Development <i>The development of large or very large-scale (over 25MW)</i></p>	<p>The Proposed Development supports the provision of wind generation from the Clocaenog Strategic Search</p>

Planning Policy	Assessment of the Proposed Development
<i>wind farms will be concentrated within the Clocaenog SSA .</i>	Area (SSA-A)
Cultural Heritage	
<p>Policy CTH/2 - Development Affecting Heritage Assets <i>Development proposals which affect a heritage asset listed below (a-f), and/or its setting, shall preserve or, where appropriate, enhance that asset.</i></p> <ul style="list-style-type: none"> <i>a) Conservation Areas</i> <i>b) Conwy World Heritage Site</i> <i>c) Historic Landscapes, Parks and Gardens</i> <i>d) Listed Buildings</i> <i>e) Scheduled Ancient Monuments</i> <i>f) Sites of archaeological importance</i> 	<p>The Proposed Development has considered the heritage assets within the area.</p> <p>Sensitive routeing of the connection has minimised potential effects on such assets and therefore the cultural assets, which are referred to in Chapter 8 shall be preserved and therefore the planning policy is complied with. Further information is provided in Chapter 8 'Historic Environment' of this ES.</p>
Minerals and waste	
<p>Policy MWS/3 - Safeguarding Hard Rock And Sand And Gravel Resources <i>1. The following resources and related facilities are included within the Safeguarded Hard Rock or Sand and Gravel designation:</i></p> <ul style="list-style-type: none"> <i>f) Sand and Gravel resources as identified on the Proposals Map.</i> 	<p>Presence of potential mineral resources is not a key routeing criterion and consequently resources have not been specifically avoided. However, if plans to exploit the mineral resources are brought forward then typically the extraction can accommodate existing overhead transmission and therefore the Proposed Development does not affect the Safeguarded Area.</p> <p>Further information is provided in Chapter 10 'Land Use and Agriculture' of this ES.</p>

5.6 The Approach to Policy for an Application made under the Planning Act 2008

- 5.6.1 The Proposed Development would comprise approximately 17km of new 132kV overhead line from a new Collector Substation at Clocaenog Forest to the existing SP Manweb substation at St Asaph.
- 5.6.2 Under the Act, the NPSs are the primary basis for decision making however, the Secretary of State may also consider other documents considered both important and relevant to its decision making, and this may include Welsh policy and the development plans. A full review of policy has been undertaken in preparing the DCO application.
- 5.6.3 Consequently the NPSs have primacy in the determination of the DCO application, and they should be afforded substantial weight. Welsh national planning policy and the local development plans are other material considerations and, recognising this status, should be afforded significantly less weight than the NPSs.
- 5.6.4 The NPSs are statements of Government policy on infrastructure in general, including renewable energy, and of particular relevance to the Proposed Development, the infrastructure required for its delivery. NPS EN-1 (para 4.1.5) identifies that, where there is a conflict between a development plan and the NPS, the NPS prevails for the purpose of decision making, given the national significance of the infrastructure.

5.7 Summary

- 5.7.1 The policy context with which the Proposed Development is set is laid out in a number of UK wide, Wales specific and local planning policy documents.
- 5.7.2 The National Policy Statements provide the policy framework for NSIPs, particularly in this instance EN-1 EN-3, and EN-5.
- 5.7.3 As identified within EN-5, with the UK moving to a low carbon economy whilst maintaining security of supply will be heavily dependent on the availability of a fit for purpose and robust electricity network.
- 5.7.4 There is significant policy support for the Proposed Development in NPS EN-1 and EN-5, which together form the basis against which the Proposed Development should be assessed.
- 5.7.5 The Proposed Development facilitates the Governments' objectives for energy and climate change (EN-1) and the topic chapters of this ES demonstrate how the Project meets the specific objectives in EN-5.
- 5.7.6 In accordance with policies in EN-1 and EN-5, SP Manweb has sought to limit any adverse impacts where possible. Significant time has been invested by SP Manweb in consulting in connection with the proposals and refining the Proposed Development prior to making the DCO application. The iterative process adopted and positive engagement received from stakeholders has helped to ensure that the design of the Proposed Development will minimise adverse impacts associated with its construction, operation and decommissioning.

- 5.7.7 The Act requires that the application for development consent should be decided in accordance with NPS EN-1 and EN-5. It is submitted that the Proposed Development is in accordance with the NPSs and that by providing the necessary infrastructure for the four wind farms, brings significant benefits in supporting the security of the UK's energy supply.