



Nant Mithil Energy Park, Powys.
PEDW DNS Application Ref: DNS CAS-01907-D7Q6Z1.

CPRW-RE-think Chapter 11 on

Carbon Balance

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Evidence by CPRW-RE-think on:

Carbon Balance

Application for Planning Permission under the
TOWN & COUNTRY PLANNING ACT 1990 and PLANNING (WALES) ACT 2015

REPRESENTATION on behalf of **RE-think**, a Third-Party Objector Groups of affected local residents, and **CPRW** the countryside charity, in relation to an application for a 'Development of National Significance' (reference number: CAS-01907-DZQ6Z1), under the Town and Country Planning Act 1990 as amended by the Planning (Wales) Act 2015 and the Developments of National Significance (Wales) 2016 (as amended) and subsequent Regulations, for 'the construction and operation of an energy park including wind energy developments and associated infrastructure and habitat management areas' on land 'approximately 9km east of Llandrindod Wells', Powys.

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1. INTRODUCTION

- 1.1. This submission relates to the Application for a 'Development of National Significance' (reference number: CAS-01907-DZQ6Z1) (Application), under the Town and Country Planning Act 1990 as amended by the Planning (Wales) Act 2015 and the Developments of National Significance (Wales) 2016 (as amended) and subsequent Regulations, for 'the construction and operation of an energy park including wind energy developments and associated infrastructure and habitat management areas' consisting of 30 wind turbines with a tip height of up to 220m and associated access tracks (Proposal) on land 'approximately 9km east of Llandrindod Wells', Powys (Site). The Application is made by Nant Mithil Energy Park Ltd, a subsidiary of Bute Energy (Applicant) (ES 1.10).
- 1.2. The Representation is submitted jointly by **RE-think**, a Third-Party Objector of groups of affected local residents, and **CPRW**¹, a charity, established in 1928, which seeks protection and enhancement to the countryside and environment in Wales.
- 1.3. This submission relates to the potential climate change and the carbon balance arising from the Proposal and responds to the Applicant's ES chapter 14.

2. CLIMATE CHANGE AND CARBON BALANCE ARISING FROM THE PROPOSAL

- 2.1. The Applicant sets out their assessment of the Climate Change effects and carbon balance they claim arises from the Proposal in Chapter 14 of the EIA and the associated App. 14.1.
- 2.2. In these documents the Applicant states "*in the absence of a Welsh equivalent of the tool the use of the SEPA tool is considered suitable*". They identify this SEPA 'tool' as the "*Scottish Government Carbon Calculator Tool (v1.1.18)*". The Applicant states "*the carbon calculator underpinning this chapter*" (App. 14.1-4).
- 2.3. The Applicant sets out the result of the Carbon Calculator, in App. 14.1 and go on in Chapter 14 to base their assessment of the carbon change and carbon balance based on this Carbon Calculator Tool.
- 2.4. In so doing, the Applicant notes that "*the Carbon Calculator Tool has been unavailable from the Scottish Government website*", since "*May-June 2024*" (ES 14.6). Nevertheless, the Applicant uses and presents the results of the Carbon Calculator from a time when it was available.
- 2.5. Somewhat surprisingly, the Applicant does not explain why the Carbon Calculator Tool is unavailable.

¹ Campaign for the Protection of Rural Wales.

- 2.6. The carbon calculator is ‘unavailable’ because it has been discredited and shown to be unreliable. An independent assessment has shown that the carbon payback period produced by the calculator is not consistent, that its accuracy is lacking and that the data being input by users, such as the Applicant, cannot be relied on. Accordingly, the carbon calculator tool is unavailable because it should not be used and cannot be relied upon. The Scottish Government and SEPA no longer stand behind the tool.
- 2.7. Furthermore, even a casual assessment of the Applicant’s use of the tool shows that the results and the conclusions the Applicant draws from this, together with their overall assessment of the carbon balance, is seriously flawed.
- 2.8. Amongst the many problems with their assessment is the fact that the Applicant does not take account of the loss of power resulting from the transmission of electricity at 132kV for over 97km. Over such distance using an overhead line at 400kV, the usual standard for UK long distance transmission in the UK, the power losses would be negligible. However, by using a 132kV connection, the voltage usually used in the UK for distributing electricity over short distances (that is a few kilometres), for 97km the power losses will be considerable (see CPRW/RE-think Introduction and its Annex 2). Accordingly, the power output claimed by the Applicant for the Proposal will be substantially less than quoted.

3. CONCLUSIONS

- 3.1. Overall, it is clear that the Applicant’s assessment of the Climate Change effect and carbon balance, set out in Chapter 14 of the ES, is deeply flawed and should not be relied upon.
- 3.2. Accordingly, the Applicant’s judgement that negative effects of Climate Change and carbon balance are “*not significant*” and that positive effects are “*major significant*” (ES Table 14.5 and 14.6) are unsound and cannot be relied on. It is deeply surprising that the Applicant seeks to promote this Proposal based on such a flawed assessment. Doing so reflects on the credibility of the Applicant.

CDF
for RE-think & CPRW
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