

Senedd Cymru | Welsh Parliament

[Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith](#) | [Climate Change, Environment, and Infrastructure Committee](#)

[Bil yr Amgylchedd \(Ansawdd Aer a Seinweddau\) \(Cymru\)](#) | [The Environment \(Air Quality and Soundscapes\) \(Wales\) Bill](#)

Ymateb gan Y Grid Cenedlaethol | Evidence from National Grid

General principles

What are your views on the general principles of the Bill, and is there a need for legislation to deliver the stated policy intention?

The general principles are well-founded and well explained in the Bill and its supporting documents. In particular, the principle of Agent of Change is welcome where residential encroachment around existing infrastructure may occur.

While the principles of soundscaping and the potential benefits this can bring for communities is understood, the Bill and its draft guidance is not clear on how it will impact large and complex energy infrastructure schemes, some of which may be nationally strategic infrastructure projects (NSIP) and others local planning, potentially involving a number of local authority or council areas.

When National Grid receives a connection request from an energy provider, which importantly, increasingly includes renewable energy providers, it has a legal duty to make a connection offer. This may trigger the requirement for significant electricity infrastructure reinforcements and new, often highly contentious, electricity transmission connections, such as those recently proposed in mid-Wales and North Wales (both currently on hold).

There are concerns relating to proposals for new electricity transmission connections, which by their nature may include electricity substations and high voltage overhead transmission lines. High voltage overhead lines are visible and make noise; the mechanisms of noise production being a complex interaction between high voltage components and external factors, principally weather. While this noise is generally of a low level, which may impact a relatively small number of sensitive receptors, these are essentially linear projects passing through a number of geographic areas and soundscapes, including rural and remote areas, and those that may be deemed tranquil areas. Substations often contain reactive plant such as transformers, which produce a low frequency 'hum' sounding noise. Even with noise mitigation measures this noise may still be audible beyond a site boundary.

While National Grid will consult fully on these types of schemes and will undertake comprehensive environmental impact assessments which will feed into the design process, it is felt that discussions around the concepts of soundscaping, which are still not clearly defined, will significantly increase the complexity and time required to undertake the consultations and impact assessments.

Therefore, it is requested that energy infrastructure is specifically excluded from the draft Bill. The requirement to adopt a soundscaping approach will introduce additional complexity and uncertainty

for stakeholders, applicants, and decision makers on how to balance soundscaping requirements with National Grid's statutory duty to develop and maintain an efficient and economic transmission system and meet the Welsh Government's net zero target. Energy infrastructure will, of course, still be subject to existing planning requirements in Wales as well as the overarching requirements of the relevant National Policy Statements in England and Wales.

What are your views on the Bill's provisions (set out according to sections below), in particular are they workable and will they deliver the stated policy intention?

National air quality targets (sections 1 to 7)

Promoting awareness about air pollution (section 8)

National air quality strategy (sections 9 to 11)

Air quality regulations (section 12)

Local air quality management (sections 13 to 15)

Smoke control (sections 16 to 18)

Vehicle emissions (sections 19 to 21)

National soundscapes strategy (sections 22 and 23)

The national strategy would allow local authorities to set their own local strategies which may then set different and more stringent requirements than those currently set out in the draft TAN-11 and its guidance. This may result in a piecemeal approach to larger infrastructure projects and result in significant delays to the delivery of renewable energy projects.

Under the draft TAN-11 the requirement to undertake a noise and soundscape design statement (NSDS) is introduced. While the main aim of this document is noise- (or soundscape-) sensitive development, it is likely this will also be applied to noise-producing industrial development. TAN-11 leans on BS4142 as a method to determine the significance of impact. It needs to be recognised that in some cases BS4142 may not be the most appropriate method to determine significance, in particular for linear infrastructure such as overhead transmission lines.

Strategic noise map and noise action plans (sections 24)

General provisions (sections 25 to 28);

What are the potential barriers to the implementation of the Bill's provisions and how does the Bill take account of them?

How appropriate are the powers in the Bill for Welsh Ministers to make subordinate legislation (as set out in Chapter 5 of Part 1 of the Explanatory Memorandum)?

Are any unintended consequences likely to arise from the Bill?

More clarity is required regarding how the Bill may be applied to energy infrastructure, in particular to large transmission projects that are likely to be required to enable the Welsh Government aims to meet 100% of its electricity needs from renewable sources by 2035.

What are your views on the Welsh Government's assessment of the financial implications of the Bill as set out in Part 2 of the Explanatory Memorandum?

Are there any other issues that you would like to raise about the Bill and the accompanying Explanatory Memorandum or any related matters?
