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12 December 2011

Annwyl Dafydd

ENVIRONMENT & SUSTAINABILITY COMMITTEE INQUIRY: ENERGY POLICY AND PLANNING IN WALES

The Countryside Council for Wales champions the environment and landscapes of Wales and its coastal waters as sources of natural and cultural riches, as a foundation for economic and social activity, and as a place for leisure and learning opportunities. We aim to make the environment a valued part of everyone's life in Wales.

Thank you for giving CCW the opportunity to provide oral evidence at this inquiry. In the session on Wednesday, 23 November 2011, we agreed to provide some additional information following up some of the points raised. We also want to use this opportunity to clarify some of the points from our evidence session and to draw your attention to issues arising from other sessions picked up from our regular review of Senedd TV. This letter, and the attachments referred to, provide this.

The additional information and clarification:-

1. Energy and landscape

The CCW Council paper on energy and protected landscapes [reference CCW P 11 23 (c)] requested during our oral evidence session is attached to this letter.

2. Energy consultations received by CCW

Please find attached additional detail on the number of energy related consultations received by CCW between 1 April 2008 and 31 March 2011. This report describes the trends in the volume of energy consultations received by CCW, proportional representation by energy sector, power output (ie above or below 50MW), regional distribution and our response performance.



Gofalu am natur Cymru - ar y tir ac yn y môr • Caring for our natural heritage - on land and in the sea

3. CCW powers to grant authorisations, licenses and consents

We wish to clarify a point made by Mr Burley, Director, Planning Inspectorate Wales earlier in the session on Wednesday, 23 November 2011, in relation to environmental permitting and species licences. The Countryside Council for Wales has power to grant authorisations, licenses and consents under a number of enactments relating to nature conservation in Wales but these are mainly for conservation, scientific or educational purposes. It is Welsh Government (WG) that issue licenses in the context of developments, and CCW is a statutory advisor to WG in that context. In addition, legislation places a requirement on owner occupiers of SSSI to give notice and receive consent from CCW prior to carrying out certain damaging activities. Competent authorities also have to consult CCW prior to carrying out works within a SSSI or affecting a SSSI. Such consultations (and CCW's response to them) may be termed 'assents', eg an assent under Section 28i of the Wildlife and Countryside Act 1981 as amended.

4. Question asked by Llŷr Huws Gruffydd on the energy and environment sector panel

We would like to clarify the response we made to the question from Llŷr Huws Gruffydd on the energy and environment sector panel (paragraphs [186] and [188] in the transcript of our evidence session) as there was a confusion resulting from the translation of the question in the oral session. CCW is aware of the energy and environment sector panel which was established in March 2011 but have not been involved in this group or the scope of it. We feel that a Welsh Government led renewable energy delivery board or forum which membership included developers, CCW, EA, LPA and others to work constructively to facilitate the deployment of renewable energy more effectively in Wales would be beneficial.

5. Anaerobic Digestion

We committed to providing additional information about the extent of our involvement in the Welsh Government planning committee on Anaerobic Digestion. I can confirm that CCW was involved in this group which met approximately bi-monthly over around 18 months, and for the last time in December 2010. CCW was represented on the group by Karen Maddock-Jones, Senior Planning Advisor. This group successfully brought together a number of the key organisations enabling a sharing and understanding of the issues required for the consideration and consenting of these developments for the key bodies involved. A task and finish format was used to try and deliver some specific targets including the drafting of guidance for applicants. This identification and sharing of common issues was useful for WG Waste Division to gain an understanding of the various issues involved in delivering projects and a model which could be used for other sectors. However, the tasks assigned to the group in a task and finish format, including the drafting of specific guidance, were too challenging to deliver without additional support.

6. Evidence provided by others

CCW use the service provided by Senedd TV to follow and scrutinise committee sessions as a matter of course. West Coast Energy (WCE) gave oral evidence on Thursday, 1 December, as part of the Energy & Planning Inquiry and referred to CCW's involvement in the proposed Tir Gwynt windfarm. By means of a follow up to this session, we would like to draw your attention to the attached letter from WCE expressing their thanks

to us, and particularly for our advice to Powys County Council (Steve Packer, Chief Planning Officer at Powys County Council). This was received by our case officer Carol Fielding (Montgomeryshire Team Leader) after WCE received consent for the Tir Gwynt windfarm.

I hope you find this additional information helpful. If you would like to discuss any of the points we have raised, please contact Keith Davies (k.davies@ccw.gov.uk) in the first instance.

Yn gywir

A handwritten signature in black ink, appearing to read 'Morgan Parry', written in a cursive style.

Morgan Parry
Chairman

Enc

ENERGY & PLANNING INQUIRY - ENERGY CASEWORK REPORT

Contact: Gareth McIlquham, Planning Casework Officer, CCW South & East Region.

PURPOSE

1. This report provides an overview of energy consultations received by CCW. The results presented are:
 - a. energy casework between 1st April 2008 and 31st March 2011;
 - b. energy casework in 2010 / 2011.

INTRODUCTION

2. In 2008 / 2009 CCW received 302 energy consultations, 267 in 2009 / 2010 and 485 in 2010 / 2011 (latter figure updated since oral evidence session).
3. CCW work closely with regulators and developers on major energy cases to ensure the best environmental outcome for a development. Consequently, CCW rarely object to energy developments and have done so in only 1% of cases in 2010 / 2011.
4. In many cases we received several consultations per application. In particular, we were consulted at each stage of an environmental impact assessment or assessment under the 'Habitats' Regulations. Therefore, the energy consultations for each financial year relate to somewhat fewer applications; however, several responses may be required for each consultation.
5. CCW is a statutory consultee for regulatory authorities considering consents for development that may affect SSSI, SAC, SPA, Ramsar sites, protected species or landscape protected areas (e.g. AONB and National Park).
6. The deadline for consultations is normally 21 days from the date of the letter, but some authorities set a 14 day deadline. Deadlines for other consultations range from a few days to a month or more. We still received many consultations in hard copy, taking up to 4 days to reach us; however, the Planning Portal and e-mail consultations are beginning to speed up the process.
7. The information behind this brief comes from CCW's casework database. Energy Consultations are recorded under the following 'Primary Proposal Types':
 - Non-Renewable Power Station;
 - Offshore Oil & Gas;
 - Energy – Other;
 - Powerline / Grid Infrastructure;
 - Renewable – Biomass;
 - Renewable – Hydro Electric;
 - Renewable – Marine;
 - Renewable – Other;
 - Renewable – Solar Farm;
 - Wind Turbine – Offshore;
 - Wind Turbine – Onshore Windfarm >1.5MW;
 - Wind Turbine – Small-Scale Onshore <1.5MW.

RESULTS

Energy Casework 1st April 2008 to 31st March 2011

8. Quarterly Summary - Figure 1, Table 1

Until Q1 of 2010 / 2011 energy consultations were generally constant at around 70 consultations per quarter. In 2010 / 2011 a dramatic rise in energy consultations occurred equating to an 82% increase on 2009 / 2010 (Table 2). This follows a 12% drop in energy consultations in 2009 / 2010 from 2008 / 2009.

9. Annual Change in Energy Sector - Figure 2, Table 3

The rise in 2010 / 2011 energy consultations is attributed to the rapid growth of the renewables sector; particularly smaller schemes: hydropower, solar, other renewables and small-scale wind. Grid Connection consultations have declined over the period in line with Onshore Windfarms; many of these are still ongoing cases.

10. Energy Consultations >50MW – Tables 6 & 7

13% of energy consultations in 2008 / 2009 were for projects >50MW, 8% in 2009 / 2010 and 9% in 2010 / 2011. These were recorded for Non-Renewable Power Stations, Powerline / Grid Infrastructure, Renewable – Biomass and Wind Turbine – Onshore Windfarm >1.5MW.

The greatest proportion of >50MW consultations are recorded for Non-Renewable Power Stations and Onshore Windfarms; 43% and 24% respectively in 2010 / 2011.

Caveat – The Casework Recording System is not designed to split consultations by power output. The split has been derived using consultations attributed to the Electricity Act s.36 consents or the Infrastructure Planning Commission; this may not determine all consultations for projects >50MW. Both s.36 and IPC consultations relate to applications over 50MW, below this threshold consultations are recorded under the Town & Country Planning Act.

Energy Casework 2010 / 2011

11. Regional Casework Volume - Figure 3 (& 4), Table 4

44% of energy consultations in 2010 / 2011 were received in South & East Region, 33% in North Region and 23% in West Region. Small-Scale Onshore Wind attributed the most consultations in North Region and West Region (26% for each) whilst Onshore Windfarms provided 25% of South & East Region energy casework.

The bulk of some energy sectors are region specific. North Region responded to 100% of all Offshore Oil & Gas and Offshore Wind consultations and nearly two-thirds (63%) of Marine – Renewable consultations. South & East Region: 81% of Non-Renewable Power Stations, 62% of Energy Other and 59% of Renewable – Biomass. West Region's highest contributions are from Solar and Renewable – Marine at 59% and 38% respectively.

12. CCW Involvement by Energy Sector - Figure 4, Table 4

Almost half (43%) of all energy consultations received in 2010 / 2011 related to onshore wind developments – 22% Small-Scale Wind and 21% Onshore Windfarms. Grid Connection accounts for 10% of 2010 / 2011 energy consultations with the remaining categories each representing less than 10% of 2010 / 2011 energy consultations.

13. **Response Performance** - Figure 5 / Table 5

We are obliged to report on and increase our response performance through a Welsh Government target set out in the 2009 / 2010 remit letter.

In 2010 / 2011 we increased our response performance despite receiving more energy consultations. We met deadlines for 70% of energy consultations and responded to 85% within 7 days of the deadline. The 8% reduction in energy consultations over 7 days late is particularly encouraging.

The response performance reflects minimum achievements due to the way in which the data is recorded; it is likely our performance exceeds these figures.

DISCUSSION

14. The volume of CCW's energy casework rose by 82% in 2010 / 2011 to 485 consultations in the financial year.
15. This growth is generally attributed to the smaller renewables sector: hydropower, solar and small-scale wind.
16. 76% of energy projects >50MW were attributed to Onshore Windfarms, 16% to Non-Renewable Power Stations. These equate to 24% (n=79) and 27% (n=17) of >50MW consultations for these sectors respectively.
17. Onshore wind is the biggest contributor to energy casework, 43% of energy casework in 2010 / 2011 was for onshore wind developments (small and large scale) and contributed the biggest proportion of energy casework across each region.
18. We continue to improve on our response performance, which summarises for energy consultations as 84% within 7 days of deadlines. We achieved a significant improvement despite handling more consultations with fewer staff.
19. Many consultations sent to us do not include enough information to support adequate assessment. We often have to contact applicants and planning officers informally to get the necessary information before we can respond. This can delay our response to more benign developments that lack detail about elements that may affect natural heritage interests, depending on design.
20. The revision of our Operational Procedure Notice for Casework will help further improve clarity and efficiency in our responses.
21. MoUs that we have with some sectors, such as that signed with RenewablesUK, will also help streamline the handling of assessments and advice.

ANNEX 1: FIGURES

Figure 1 - Quarterly Summary: 1st April 2008 to 31st March 2011

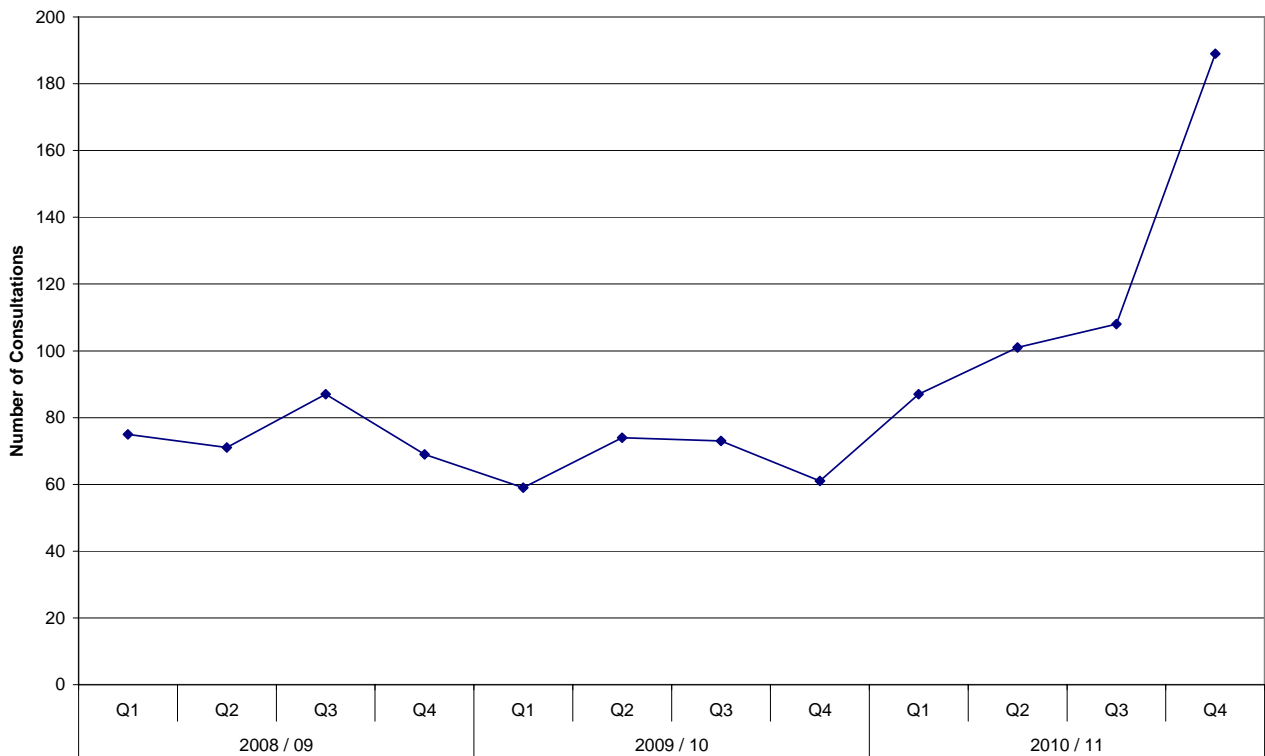


Figure 2 - Annual Change in Energy Sector: 1st April 2008 to 31st March 2011

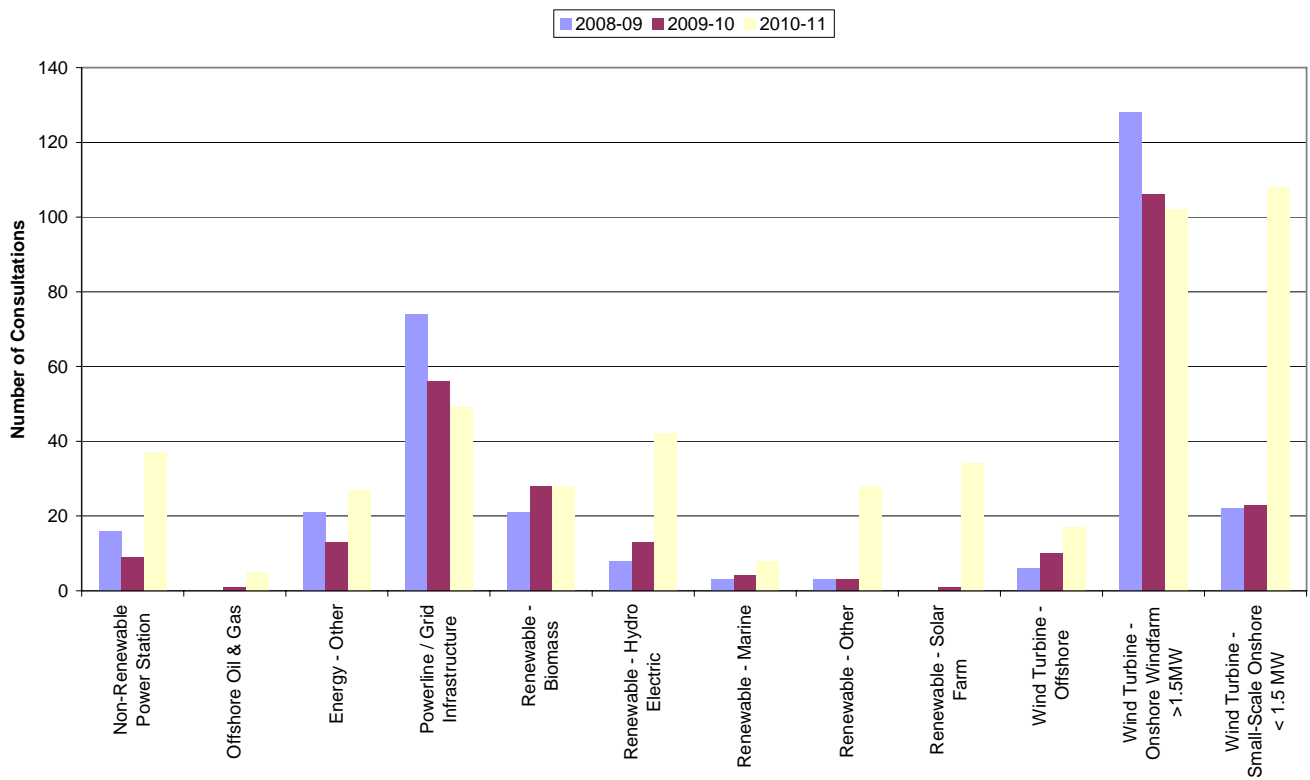


Figure 3 - Regional Casework Volume: 2010 / 2011

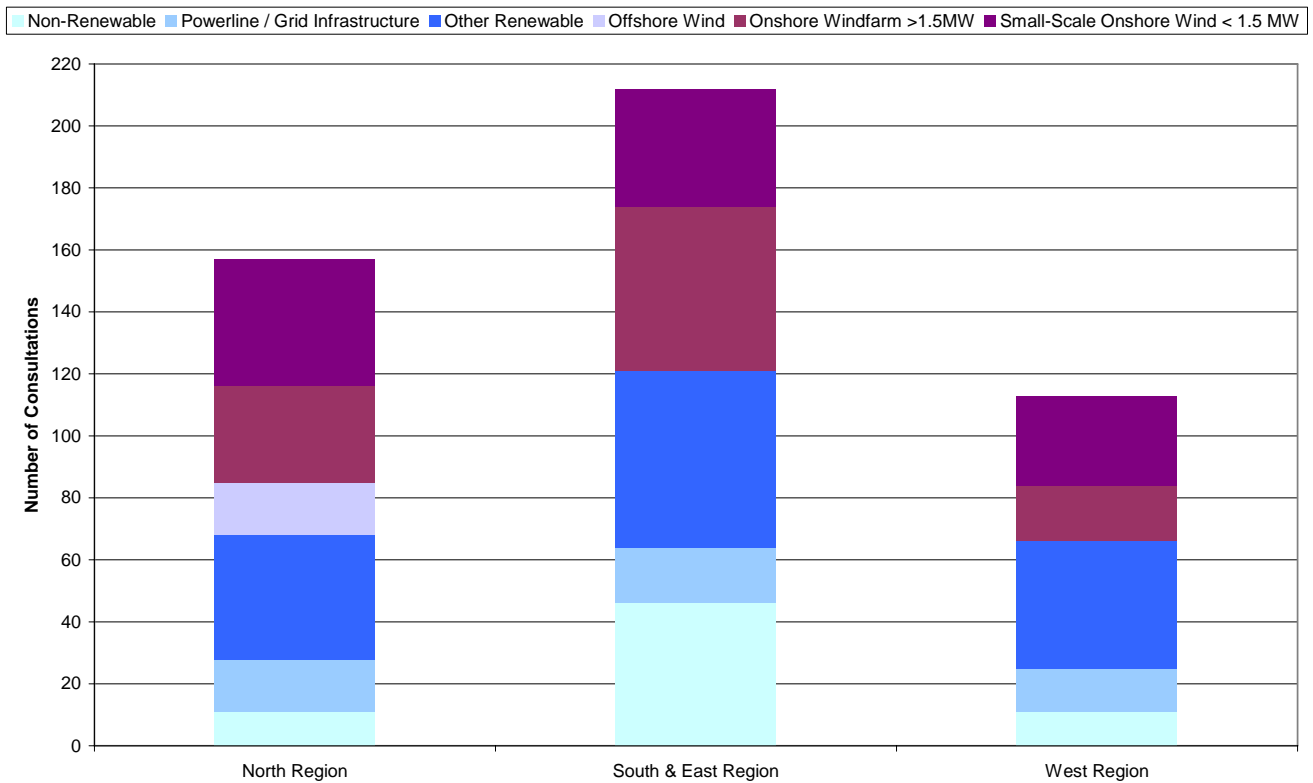


Figure 4 - Regional Involvement by Energy Sector: 2010 / 2011

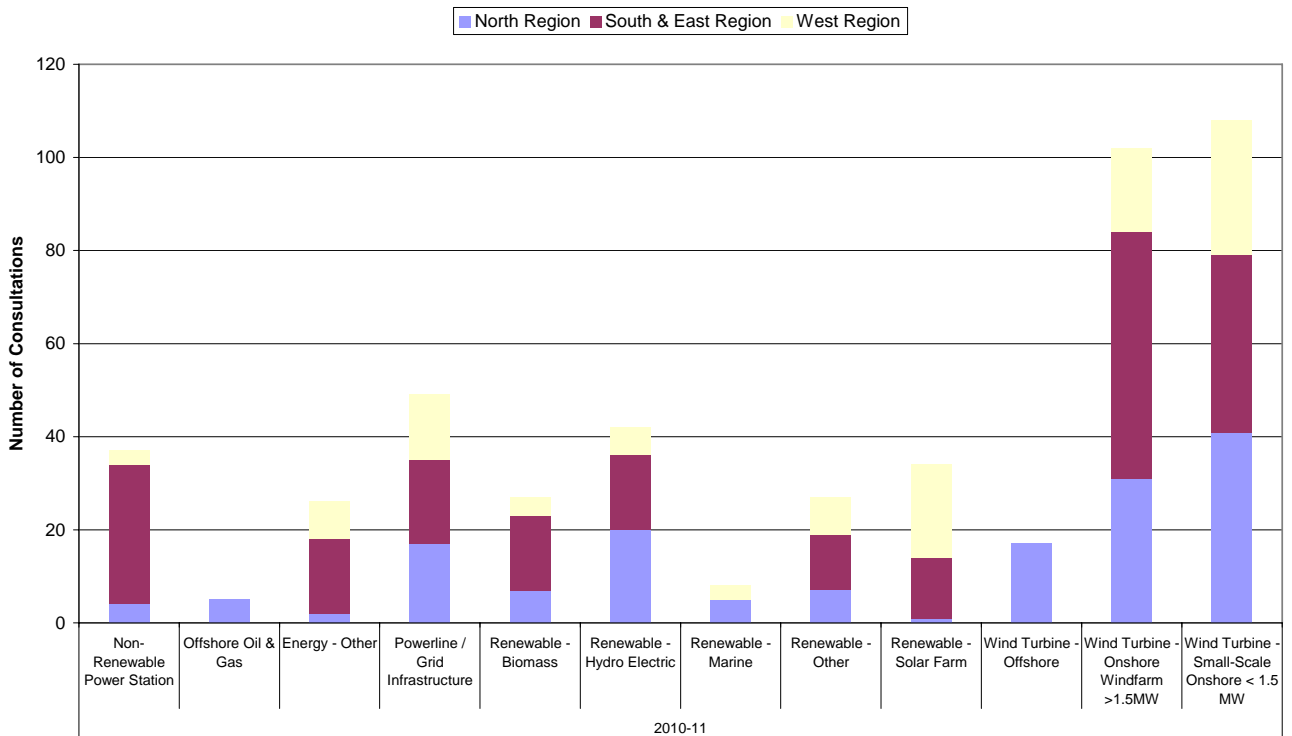
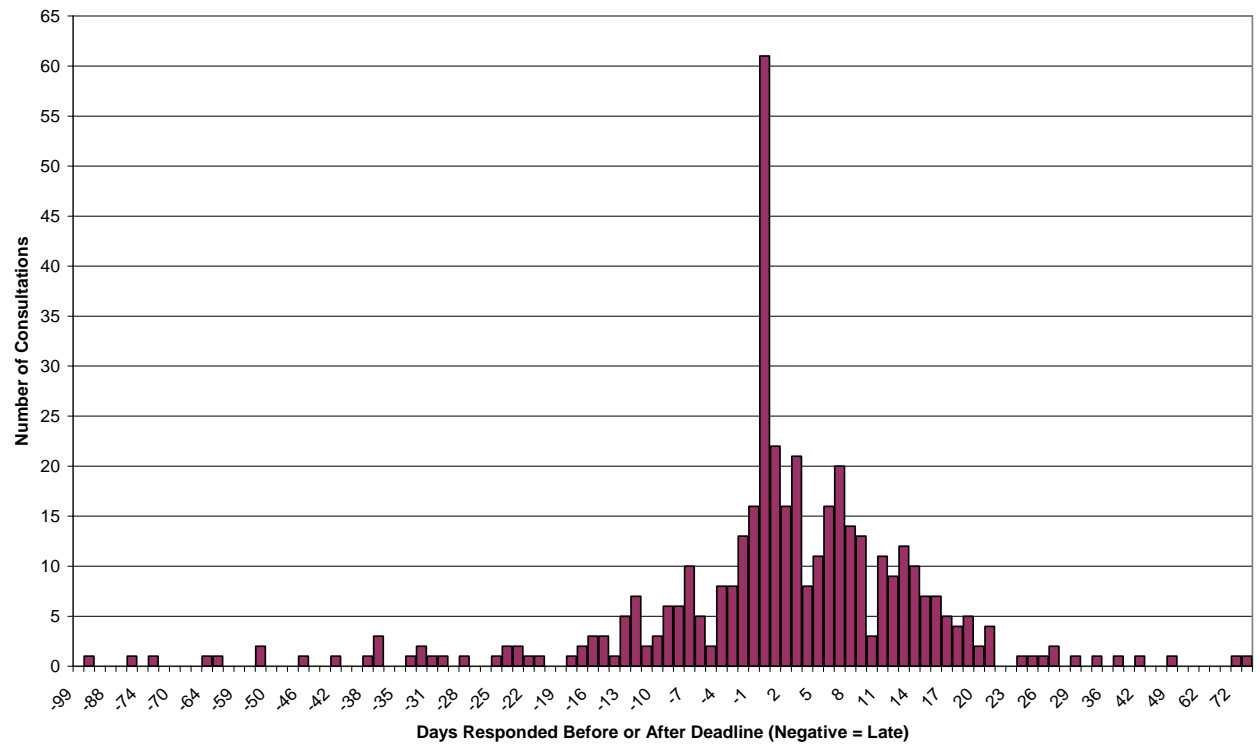


Figure 5 - Trend in Time between CCW's Response and the Deadline; Energy Consultations Only: 2010 / 2011



ANNEX 2: TABLES

Table 1 – Quarterly Summary: 1st April 2008 to 31st March 2011

2008 / 09				2009 / 10				2010 / 11			
Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
75	71	87	69	59	74	73	61	87	101	108	189
1156	1368	1302	1272	1101	1164	1204	1145	1292	1563	1459	1393

Table 2 - Number of Energy Consultations per Financial Year: 1st April 2008 to 31st March 2011

	2008 / 2009	2009 / 2010	2010 / 2011
Number of Energy Consultations	302	267	485
Increase on Previous Year	-	- 12 %	82 %

Table 3 - Annual Change in Energy Sector: 1st April 2008 to 31st March 2011

Primary Proposal Type	2008-09	2009-10	2010-11	Grand Total
Non-Renewable Power Station	16	9	37	62
Offshore Oil & Gas	0	1	5	6
Energy - Other	21	13	27	61
Powerline / Grid Infrastructure	74	56	49	179
Renewable - Biomass	21	28	28	77
Renewable - Hydro Electric	8	13	42	63
Renewable - Marine	3	4	8	15
Renewable - Other	3	3	28	34
Renewable - Solar Farm	0	1	34	35
Wind Turbine - Offshore	6	10	17	33
Wind Turbine - Onshore Windfarm >1.5MW	128	106	102	336
Wind Turbine - Small-Scale Onshore < 1.5 MW	22	23	108	153
Grand Total	302	267	485	1054

Table 4 - Generic Regional Casework Volume & Regional Involvement by Energy Sector: 2010 / 2011

Primary Proposal Type	North Region	South & East Region	West Region	Grand Total
Non-Renewable Power Station	4	30	3	37
Offshore Oil & Gas	5	0	0	5
Energy - Other	2	16	8	26
Powerline / Grid Infrastructure	17	18	14	49
Renewable - Biomass	7	16	4	27
Renewable - Hydro Electric	20	16	6	42
Renewable - Marine	5	0	3	8
Renewable - Other	7	12	8	27
Renewable - Solar Farm	1	13	20	34
Wind Turbine - Offshore	17	0	0	17
Wind Turbine - Onshore Windfarm >1.5MW	31	53	18	102
Wind Turbine - Small-Scale Onshore < 1.5 MW	41	38	29	108
Grand Total	157	212	113	482

Table 5 - Trend in Time between CCW's Response and the Deadline; Energy Consultations Only: 1st April 2008 to 31st March 2011

	2008 / 2009	2009 / 2010	2010 / 2011
Number of Energy Consultations	302	267	485
Before the Deadline	60 %	67 %	70 %
Late, But Within 7 Days of the Deadline	14 %	10 %	15 %
After 7 Days Late	26 %	23 %	15 %

Table 6 – Consultations for Projects over 50MW, derived by Electricity Act s.36 consents or Infrastructure Planning Commission related consultations.

	2008 / 2009		2009 / 2010		2010 / 2011		TOTAL
	s.36	IPC	s.36	IPC	s.36	IPC	
Non-Renewable Power Station	1	0	0	0	0	16	17
Powerline / Grid Infrastructure	2	0	3	0	1	0	6
Renewable – Biomass	0	0	1	0	1	0	2
Wind Turbine - Onshore Windfarm >1.5MW	37	0	18	0	23	1	79
TOTAL	40	0	22	0	25	17	104
	40		22		42		

Table 7 – Proportional Representation of Energy Sectors with >50MW Projects.

	2008 / 2009		2009 / 2010		2010 / 2011	
	<50MW	>50MW	<50MW	>50MW	<50MW	>50MW
Non-Renewable Power Station	94%	6%	100%	0%	57%	43%
Powerline / Grid Infrastructure	97%	3%	95%	5%	98%	2%
Renewable – Biomass	100%	0%	96%	4%	96%	4%
Wind Turbine - Onshore Windfarm >1.5MW	71%	29%	83%	17%	76%	24%

IN CONFIDENCE

DEPLOYMENT OF ENERGY PROJECTS ADJACENT TO PROTECTED LANDSCAPES

Recommendation

Council is asked to offer a steer on the issues set out in section 7 below and consider the proposed way forward as set out in section 8.

1. INTRODUCTION

Addressing climate change, ensuring security of energy supply and economic regeneration are central to the policy agenda of Government in Wales and Westminster as expressed in the Welsh Assembly Government Energy Policy Statement 'A Low Carbon Revolution' (March 2010) and DECC National Policy Statements (2011). Government also has a range of duties, obligations and priorities in relation to conserving and enhancing the natural heritage and natural resources of Wales within the overall context of sustainable development as the central organising principle of public service delivery.

In Wales the First Minister has overall responsibility for energy policy, reflecting its importance politically.

2. NATIONAL PLANNING FRAMEWORK

The land use planning system is central to the implementation of sustainable development and sets the framework for the development and use of land in the public interest.

The National Planning Policy Framework in Wales comprises Planning Policy Wales, Technical Advice Notes and procedural guidance such as circulars and is an important delivery mechanism for WG policy including climate change, renewable energy and economic renewal whilst ensuring Wales meets European and International environmental obligations.

A fundamental principle of the planning system is that the majority of decisions which impact on local communities are taken by the 25 Local Planning Authorities in Wales in the context of adopted local development plans which interpret national policy and express it locally. An exception is the consenting regime for energy projects over 50 MW on land and 100 MW at sea, which remains non-devolved.

3. PLANNING POLICY FRAMEWORK FOR RENEWABLE ENERGY

The planning policy framework in Wales is set out in:

- Planning Policy Wales (PPW) and related Technical Advice Notes provide the mechanisms to provide guidance on national planning policy, which should be taken into account in the preparation of local development plans. They are material to decisions on individual planning applications and are to be taken into account by Welsh Ministers and the Planning Inspectorate in the determination of called-in applications and appeals.
- Technical Advice Note 8: Planning for Renewable Energy which seeks to restrict the proliferation of large scale wind farms across the whole of Wales and focus on seven Strategic Search Areas.
- Edition 4 of PPW was published in February 2011 to reflect “A Low Carbon Revolution: Wales’s Energy Policy Statement” and to help facilitate the energy aspirations outlined in WG’s Energy Policy Statement. The document also sets out factual and legislative updates to TAN 8 to reflect the energy policy statement. The main substantive change amends the targets in paragraph 1.4 of TAN 8 (2005) to optimise the use of Strategic Search Areas (SSAs) to reflect the energy aspirations of WG as set out in “A Low Carbon Revolution Wales”. This raised the target from 1.1GW by 2010 to 2GW by 2015. John Griffiths subsequently wrote to Local Planning Authorities in July 2011 to provide clarity on the issue of maximum installation capacities within the SSA`s.
- National Policy in relation to National Parks is set out in `Policy Statement for the National Parks and National Park Authorities in Wales` (WAG 2007). There is no equivalent statement for AONBs.

4. CCW’S ROLE

CCW has numerous roles as an advisor to Government on energy policy and planning as far as that relates to the natural heritage of Wales and as a statutory advisor to licensing authorities responsible for the development of energy in Wales.

In the context of energy generation, CCW’s role is to provide independent, evidence based advice to the Welsh and UK Governments, Local Planning Authorities, the Infrastructure Planning Commission (IPC), developers and others on the potential impact of strategic policy, plans and programmes and individual developments on the natural heritage of Wales. We are a statutory consultee under a number of Acts and Regulations in relation to casework and are a consultation body and relevant authority in relation to the SEA and HRA processes. Advice is provided at both a project and plan/programme (strategic) level under these arrangements.

CCW aims to provide clear, evidence based and consistent advice to the Welsh Government, UK Government, developers and others, including the IPC, in fulfilling its statutory duties in relation to energy developments. This advice focuses on the **impact** of a particular development in interests of acknowledged importance relating to the natural heritage of Wales. Our aim is to ensure the decision making process is informed by the best available evidence and advice.

In common with other developments, on and offshore wind energy projects can have impacts upon the biodiversity, geodiversity, the character of landscape and seascape, historic features, soils, water resources, access and recreation and other components of the terrestrial and marine environment. These effects arise not only as a result of the wind turbines themselves, but also through their ancillary infrastructure

requirements, such as grid connections, access roads, sub-stations and concrete foundations.

5. CCW'S POSITION

In 2008, CCW issued 'Energy and Natural Heritage'. This position statement acknowledged that climate change represents the most serious long term threat to the natural environment and that there is an urgent need to reduce global greenhouse gas emissions and that there is a need to move to a low carbon economy to address climate change. This shift will require significantly more efficient use of energy and a substantial investment in low carbon, renewable energy for electricity generation, heat and transport. The position statement sets out the need for a strategically planned approach, seeking to lower overall environmental impacts of energy generation, through:

- demand management measures;
- energy efficiency;
- expanding renewable energy by getting the right technology in the right place; and
- lowering pollution from fossil fuel generation.

CCW also sets set out its support for initiatives which expand generation from lower carbon sources to reduce the long term risk to the natural environment from climate change while minimising unnecessary impacts on natural heritage. To accommodate this imperative, CCW recognises that it will often be necessary to reconcile the need to accept some local impacts on our natural heritage in the short term in order to secure a lowering of emissions from energy generation, whilst ensuring that the legal requirements to protect the environment are upheld.

6. STRATEGIC/OVERARCHING ENERGY WORK

CCW has seen a significant increase in its strategic energy related work reflecting the priority given by Government to the deployment of energy.

Number of Consultations received each Financial Year

Financial Year	2007/08(5 months)	2008 / 2009	2009 / 2010	2010 / 2011	2011 – 23 May 2011
No. Energy consultations	91	302	267	475	57

The growth and diversification of energy development has the potential to represent a significant pressure on natural heritage and our support for renewable energy creates challenges to CCW at both strategic and operational levels, especially given the often contested nature of the debate. Work has commenced on a strategic stocktake of our engagement with energy to ensure that sufficient resource is available for energy related work and that efficient use is made of existing resources. This will involve –

- Heading off issues early by engaging at a strategic level.
- Seeking external funds for energy work to relieve pressure elsewhere.

- Prioritisation of effort on significant energy related work where there are greatest potential for impacts.
- Ensuring that strategic links with policy makers and planners are maintained.
- Learning from experience in Wales and elsewhere and communicating widely.

A key aspect will be to review CCW's position on energy - CCW's Energy & Natural Heritage Position Statement. This identifies the need to accept local impacts in order to accommodate the need for renewable energy to combat the effects of climate change. However, an acceptable level of impact has not yet been defined and this is difficult to operationalise given the strict level of protection of natural heritage features and the need to address issues on a case by case basis. We will review the position statement to clarify what 'local impacts' we may be willing to accept. This is particularly relevant in relation to development within SSA's adjacent to statutory protected landscapes.

7. DEVELOPMENT IN SSAs ADJACENT TO NATIONAL PARKS AND AONBs

Planning Policy Wales sets the context for sustainable land use planning policy taking full account of economic, social and environmental issues including conserving and improving natural heritage and energy within an overall sustainable development context.

It confirms national policy towards National Parks and AONBs, namely that they must be afforded the highest status of protection from inappropriate development and that the duty to have regard to National Park and AONB purposes applies to activities affecting these areas, whether those activities lie within or outside the designated areas.

TAN 8 provides technical guidance to inform deployment of renewable energy within the overall context of government objectives for the environment.

TAN 8, and the work on which it is based, considered cumulative landscape and visual impacts at an all-Wales level to help identify seven Strategic Search Areas to resist the proliferation of large scale wind farms in other parts of Wales. The strategy adopted is a means of concentrating the impact of wind turbines in a relatively small proportion of the country in areas that are, on balance, technically, practically and environmentally, better able to accommodate such impacts than other parts of Wales.

TAN 8 (Annex D, section 8.4) states that:

- **Within (and immediately adjacent) to the SSAs, the implicit objective is to accept landscape change i.e. a significant change in landscape character from wind turbine development.**
- **There is an implicit objective in TAN 8 to maintain the integrity and quality of the landscape within the National Parks/AONBs of Wales i.e. no change in landscape character from wind turbine development.**

- **In the rest of Wales outside the SSAs, the implicit objective is to maintain the landscape character i.e. no significant change in landscape character from wind turbine development.**

The National Park Policy Statement further states that, in line with the Welsh Assembly Government's policy on major developments within the Welsh National Parks, there should be no **significant change** in landscape character as a result of wind turbine development within National Parks (or the AONBs). **This is subtly different to the wording in TAN 8 and implies that a degree of change would be acceptable.**

This conflict between national policy objectives and the divergence of interpretation between TAN 8 and the National Park Policy Statement is problematic when advising on the potential impact of specific proposals.

A steer on this issue is requested from Council at this stage to help inform our revision of the Energy Position Statement, our submission to the NAW Sustainability Committee Inquiry into Energy Policy and Planning in Wales, our input into the Revision of the National Park Policy Statement and to inform staff engaged with casework.

8. TOWARDS A WAY FORWARD

CCW believes that strategic spatial planning for renewable energy – based on rigorous evidence and assessment – is necessary to reduce both the environmental and consenting risks associated with energy development.

CCW assisted the Welsh Government in developing its strategic approach to the development of renewable energy as described in Planning Policy Wales, Technical Advice Note (TAN) 8, Planning for Renewable Energy. Our aim was then, and remains, to ensure that energy developments are located and constructed in a way that safeguards nationally acknowledged natural heritage designations. These designations are held in high regard by the Welsh Government and CCW has a statutory duty on its behalf to advise on how they can be safeguarded and promoted.

TAN 8 continues to provide a strategic spatial process and framework to help identify positive solutions, the right type of development in the most appropriate locations, thereby helping achieve Government renewable energy targets whilst minimising impacts on the environment. We believe that the decisions to date under the current TAN 8 policy framework have led to consistent decisions, upholding the intention to concentrate development strategically in SSAs and discouraging schemes outside SSAs.

The alternative, a criteria led approach, would result in inappropriate proposals in inappropriate locations with potential greater adverse impact on interests of acknowledged landscape and wildlife interests and introduce further delay to the process of deployment of renewable energy in Wales.

CCW should continue to support the principles behind a strategic and spatial planning approach for the deployment of renewable energy as expressed in TAN 8.

However we also need to acknowledge that development in SSAs adjacent to protected landscapes may continue to impact on the character of these areas. The range of impact will be variable and will depend on topography and intervisibility, landscape character and the scale of proposed development. We will continue to work proactively with developers to provide advice on how to avoid significant change in landscape character as a result of wind turbine development adjacent to National Parks and AONBs.

We will also work with WG to provide guidance on this issue to inform the current review of the National Park Policy Statement the outcome of which is likely to result in a joint policy statement on National Parks and AONBs.

9. RESOURCE IMPLICATIONS

Deployment of low carbon energy will continue to be a priority for the UK and Welsh Government. Providing policy and casework advice on deploying the right development in the right place will remain a strategic priority for CCW (and any future Single Environmental Body) but will prove challenging with respect to capacity given the volume and complexity of projects and plans.

10. COMPLIANCE

CCW is the statutory advisor to UK and Welsh Government on natural heritage in Wales and a statutory consultee under a number of Acts and Regulations to the IPC and Local Planning Authorities.

11. WELSH LANGUAGE

No issues have been identified.

12. SUSTAINABILITY ASSESSMENT

Deployment of the right development in the right location can help avoid impact on biodiversity and landscape whilst also contributing to deployment of low carbon energy with potential positive implications for reducing carbon emissions.

13. RISK ASSESSMENT

Failure to advise on policy and casework may have potentially significant adverse impact on natural heritage and also reputational risks to CCW with respect to being a perceived barrier to the deployment of low carbon energy.

Dr David Parker
Director Evidence and Advice

This paper has been prepared by Keith Davies, Head Strategic Planning Group
