

The Development Plan Group
Strategic Planning and Environment
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RE: Cardiff Council – Local Development Plan 2006-2021 Preferred Strategy Consultation

BWEA welcomes the opportunity to provide comments on the Council's Preferred Strategy Document and provides this submission on behalf of the UK wind energy industry.

BWEA was established in 1978 and is the representative body for companies active in the UK wind, wave and tidal energy market. Its membership has grown rapidly over recent years and now stands at over 350 companies, including 98.8% of all grid-connected wind energy now installed.

The UK has a rich variety of renewable energy resource, including 40% Europe's wind resource. Wind energy currently supplies approximately a million homes in the UK. It is important to support and encourage the growth of the sector and associated benefits.

In representing the wind industry, BWEA is in a unique position to comment on the circumstances which affect the future growth and development of the sector. BWEA would be pleased to clarify any issues raised and offer any further information which may be required.

Thank you for the opportunity to submit comments on the Preferred Strategy Document. If you have any queries please do not hesitate to contact me.

Yours sincerely,

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Planning Advisor, BWEA
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Cardiff Council – Local Development Plan 2006-2021 Preferred Strategy Consultation – Comments from BWEA

BWEA welcomes the preparation of the Council's Local Development Plan and urges Cardiff City Council, as the seat of the Welsh Assembly, to strengthen the renewable energy policies within this document, in order to demonstrate clear, national leadership on renewable energy generation and carbon reduction.

BWEA wish to emphasise the important contribution that the Council's policies can make in contributing to both the UK and national targets for renewable energy generation. As such, BWEA strongly recommend that the Council strengthen its preferred policies designed to deliver greater production of renewable energy and increased levels of energy efficiency – particularly Strategic Policies 26 and 27 - in order to minimise the impacts of climate change (see further details below).

Minimising Environmental Impact

BWEA strongly recommend that the Council avoid using generic phrases which simply seek to encourage the use of energy efficiency, renewable energy and the minimisation and management of waste and pollution, for example, as such phrases lack the detail and commitment necessary to ensure that such aspirations are achieved. BWEA therefore strongly recommend the inclusion of an overarching climate change policy within the Council's Strategic policies, addressing the above issues, and the inclusion of discrete, proactive policies on energy efficiency, renewable energy, and sustainable design and construction within the Development Control Document, in order to provide detailed policy direction on each issue and to ensure that such environmental measures are delivered.

Renewable Energy Policy

The LDP should include a robust criteria based policy that will be used to assess all applications for renewable energy developments. It is important that the Plan presents a positive, objective and robust approach to renewable energy for the wider and local benefit. As such, BWEA recommend that the Council include a specific development control policy on renewable energy, providing direct reference to TAN8 and its Annexes.

Technical Advice Note 8 states that local development documents should contain policies designed to promote, rather than restrict, the development of renewable energy resources and energy efficiency as part of the national and international response to climate change¹. BWEA therefore recommend that policies designed to safeguard the character and setting of listed buildings, conservation areas and greenbelt, for example, have regard to the positive contribution that renewable energy can play in reducing the Council's overall CO2 emissions and in mitigating against the environmentally damaging effects of climate change.

RE: Strategic Policy 26

In light of the above, BWEA strongly urges the Council to include a prescriptive micro-generation policy and reference to the positive contribution that such a policy can have in increasing overall level of energy efficiency while significantly reducing energy related carbon emissions within development.

Within Strategic Policy 26, BWEA urge the Council to provide clarity as to what constitutes an 'appropriate development proposal', for the provision of microgeneration. BWEA also suggest that this policy be reworded in order to give greater strength and concision. The following wording is highlighted as an example:

¹ Technical Advice Note 8, paragraph 5.2, page 12

'All non-residential or mixed use developments (new build, conversion, or renovation) above a threshold of 1,000m² will be expected to provide at least 10% of their energy requirements from onsite renewable energy generation.

All residential developments (new build, conversion, or renovation) of 10 or more units will be expected to provide at least 10% of their energy requirements from onsite renewable energy generation.'

BWEA consider Strategic Policy 27 to address many of the aspects of Strategic Policy 26 and therefore recommend consolidating these within a single policy, as suggested above.

RE: Strategic Policy 2

BWEA recommend that the Council's design policy, as shown in Strategic Policy 2, provide further clarification in terms of the requirement to 'demonstrate sustainable good design', by extending the remit of the policy to include sustainable design and construction practices (e.g. passive stack ventilation, locally sourced materials, solar orientation etc.) as a means of reducing the environmental impact of development. It is important that explicit links are made between Strategic Policies on Design and Strategic Policies on Renewable Energy.

While building regulations will be strengthened over the next decade, BWEA recommend the inclusion of a discrete policy on sustainable design and construction methods, and the introduction of minimum efficiency standards for extensions, change of use conversions, and refurbishments / listed building restorations. Such a policy would help ensure increases in energy efficiency within the existing building stock, as well as in new build development.

In addition, BWEA recommend that the development plan provide a brief outline of the different renewable energy generation technologies, and equally encourage and promote all forms of renewable energy (solar, biomass, wind, geothermal, hydro etc). The potential for an Energy Services Company and site-wide CHP should also be considered for inclusion.

Thank you for the opportunity to submit comments on these documents. BWEA looks forward to future opportunities to participate in this consultation. If you have any queries please do not hesitate to contact BWEA.