

Planning Division
Welsh Assembly Government
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October 8 2010

Dear Ms Healy,

RE: Planning Policy Wales, Section 12.8 Planning for Renewable Energy

RenewableUK welcomes the opportunity to provide comments on the Welsh Assembly Government Consultation Document: Planning Policy Wales, Section 12.8 Planning for Renewable Energy. This submission is provided on behalf of the UK wind, wave and tidal energy industry.

RenewableUK (formally 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 643 companies.

The UK has a rich variety of renewable energy resource, including 40% of Europe's wind resource. This resource will need to be utilized if the UK is to deliver its share of Europe's 20% renewable energy target by 2020. Given the UK's low base-line levels of renewable heat, the majority of this target will need to be met through onshore wind. It is therefore important to support and encourage the growth of the sector if Wales is to meet its contribution to UK and European renewable energy and carbon reduction targets.

In representing the wind industry, RenewableUK is in a unique position to comment on the circumstances which affect the future growth and development of the sector. RenewableUK 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 draft Planning Policy Wales Document. If you have any queries please do not hesitate to contact me.

Yours sincerely,

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Head of Renewable UK Cymru
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Planning Policy Wales, Section 12.8 Planning for Renewable Energy – Response by Renewable UK

RenewableUK welcomes the Welsh Assembly Government's proposed update to national planning policy on renewable energy in Wales and wishes to emphasise the important contribution that well thought through planning policies can make towards the renewable energy generation targets of Wales and the UK as a whole. RenewableUK supports policies that will deliver greater production of renewable energy and increased levels of energy efficiency, in order to minimise the impacts of climate change. Political leadership and action is needed to support the Welsh Assembly Government's 'Low Carbon Revolution' Energy Policy Statement, and positive local decisions are needed if Wales is going to achieve its renewable energy targets.

Response to Consultation Questions:

Q1 Do you agree with the proposed scales of renewable energy development outlined in Figure 12.3?

We note that the consultation suggests a threshold for electric and heat generation. Projects of more than 25MW of onshore wind and over 50MW of all other renewables will be termed 'Strategic'. As TAN8 guidance stipulates that onshore wind projects over 25MW should be located within the 'Strategic Search Areas' (SSAs) using the term 'Strategic' for that size of project is reasonable.

We especially welcome the classification of 'Local' scale of energy development that would encompass projects with generation capacity of between 5MW and 25MW. The identification of local scale developments may assist in closing the gap that exists between the developments of 'community' schemes under 5MW and 'strategic' scale schemes above 25MW. RenewableUK is of the opinion that if 2010 onshore wind targets are to belatedly be met then there needs to be a further contribution from projects that are located outside the designated SSAs. Please see further details in response to Question 3 below.

It is proposed that projects that are between 50kW and 5MW are to be termed 'Community'. However although heat generation is identified in Figure 12.3, electricity generation has been omitted. TAN8 para 2.12 states "*The Assembly Government expects local planning authorities to encourage... smaller community based wind farm schemes (generally less than 5 MW)*". RenewableUK has longed argued that community led wind schemes should not be limited to below 5MW and are concerned that labelling projects between 50 kW and 5 MW as 'Community' reinforces this perception. RenewableUK recommends that the term 'Community' is not used for developments of this scale. RenewableUK suggests that wind energy schemes below 50kW should be called 'Micro' scale with projects between 50kW and 5MW being identified as 'Small' rather than 'Community' schemes.

Q2. Do you believe that local planning authorities should set local targets for renewable energy generation within the Local Development Plan?

RenewableUK supports the principle of locally set targets for renewable energy generation. Providing that local targets are set as a 'floor' and not as a 'ceiling' we strongly believe that targets may assist the delivery of renewable energy projects in the future, and we strongly support their use as a material planning consideration.

However, for any targets set at a local level to be fully informed, credible and robust, they must be founded on a robust and credible evidence base. Further considerations should then be given as to how an evidence base could be created, and on what basis. Further direction may be needed to advice Local Planning Authorities (LPAs) as to what regard should be had to the delivery of local and / or wider EU and national targets. The existence of targets should not be used as a reason for refusing further development if new projects can be shown to contribute towards wider renewable energy need.

The identification of broad areas considered by LPAs to be appropriate for wind energy development in addition to and outwith SSAs may be welcomed by the industry in principle, however, we do not consider it appropriate for LPAs to allocate specific sites for wind energy developments within Local Development Plans (LDPs).

Q3. Do you agree that Local Development Plans should include allocations for renewable energy development?

We agree that local authorities should set targets for renewable energy generation and that LDPs should identify broad areas for renewable energy deployment. However, it is questionable to what extent local authorities will be held to these targets given that TAN8 has already set indicative targets for each of the SSAs.

It is well understood that existing capacity targets within the SSAs are far from being achieved. RenewableUK strongly questions the assertion that up to 2GW of wind energy can be delivered from within the existing SSAs. In order for 2GW of onshore wind to be deployed by 2020, RenewableUK believes that there is a clear need for a greater amount of wind energy capacity to be delivered outwith the SSAs

As previously stated, RenewableUK greatly welcomes the Welsh Assembly Government's proposals for local planning authorities to bring forward broad areas for renewable energy development within their local development plans, in order to enable the delivery of Wales' renewable energy targets. We also very much welcome the initiative shown by the Assembly Government in introducing a Tool Kit and 'Generating Your Own Energy' pamphlet as good practise guides for the benefit of local authorities and note a 6 month pilot grant scheme worth £150,000 for which local authorities can apply.

However, we believe that it remains questionable as to what extent LPAs will be able to provide the resources and expertise to support assessment exercises designed to identify the renewables capacity in their areas. In order to further enable LPAs to conduct these studies we recommend that the above grant scheme be made permanent, while also seeking other ways in which the Government and industry can better assist LPAs with renewable energy issues.

If expectations are going to be placed on local authorities to carry out renewables capacity assessments and if Wales' 2020 renewable energy targets are to be met, it will also be necessary to set out what sanctions the Assembly Government is willing to apply on LPAs in order to ensure that local renewable energy targets in Wales are not only established but also delivered.

Q4. Do you agree with the set of national criteria for determining renewable energy projects as set out in section 12.10?

We are generally supportive of the national criteria for determining renewable energy projects as opposed to a site specific or SSA approach which is subject to LPA site identification or modification.

Other related comments.

12.8.1

The introductory paragraph should identify which bodies should use PPW and make it clear that it should be given significant weight by planning authorities and statutory consultees in their consideration of renewable energy projects.

Figure 12.1

In identifying the potential generating capacity from different technologies RenewableUK, representing the technologies of onshore wind, offshore wind, tidal stream and wave, fully appreciates the value of having a strong mix in order to maximise renewable electricity generation. RenewableUK would like to emphasise that currently the most readily available and viable form of electrical renewable energy is onshore wind and that it is vital that Wales fully exploit this source not only to contribute towards targets, but also to increase industry confidence with a view of securing investment for other forms of renewable technology which will be increasingly deployed in the future.

It is important that the final draft of PPW should emphasise that the technology specific target outlined in the table should not be considered as a 'cap' or as a reason for refusal to deploy any other renewable energy technology that can contribute to Wales' overall target. It should be

acknowledged that a mix of technologies should be used with progress being made in the development of new technologies such as wave and tidal. In the meantime focus should remain on deploying the most mature, cost effective and viable renewable technologies including onshore and offshore wind. In a case where one technology is not contributing as much as anticipated, greater weight should be given to the further developments of technologies that can continue to contribute towards targets.

In order to monitor progress towards the delivery of renewable energy targets, RenewableUK has previously called for the introduction of interim milestones to track progress. Without effective monitoring of renewable energy deployment we believe that there is a great risk that momentum towards targets will be lost and that final targets will fail to be achieved.

12.8.2

This paragraph states that planning policy at all levels should help deliver the objectives of the Welsh Assembly Government as set out in their Energy Policy Statement. The paragraph is also important as it provides an explicit link to the requirements of the EU Renewable European Energy Directive and to the UK Renewable Energy Strategy. Planning authorities and statutory consultees should give significant weight to these overall objectives.

12.8.7

The meaning of the term 'optimise' is unclear in planning terms, and should be replaced by the phrase 'deliver renewable energy (electricity) generation'. A further bullet point should be added making reference to the contribution of renewable energy towards securing energy supply to the UK.

12.8.10

RenewableUK strongly agrees with the statement that "wind power continues to offer the greatest potential for strategic scale renewable energy generation." This statement adds to the previous Ministerial Interim Planning Policy Statement (MIPPS) 01/2005: Planning for Renewable Energy, and Technical Advice Note 8 (TAN8): Planning for Renewable Energy, which recognised that onshore wind energy is currently the most advanced renewable technology, and that the largest share will need to come from this source. MIPPS and TAN8 specified that an additional 800 MW of electricity would need to be generated by onshore wind farms to meet the 2010 target, a target that is going to be missed by a significant margin. In terms of impact of onshore wind farms on the environment and landscape, PPW should recognise that renewable energy development impacts will vary on a case by case basis. It should also be recognised and accepted that onshore wind farms will inevitably have a visual impact, and that this impact may also be cumulative; especially in or near SSAs where a significant level of cumulative visual impact should already have been accepted, in their very identification as Strategic Search Areas.

12.8.11

The consultation states that a 'limited number' of large scale wind farms will be required in the SSAs. However, TAN8 linked each SSA to an indicative target for onshore wind generation and we recommend that reference be made back to this document, rather than referring to this indicative capacity in terms of a 'limited number' of wind farms. It should also be noted that as the onshore wind target to be delivered within the SSAs has been recently increased to 2GW, the indicative targets in TAN8 will need to be amended upwards. As previously stated, such targets, wherever they are applied, should be regarded as a 'floor' and not as a 'ceiling'.

Please see our response to Question 3 above regarding the industry's concerns as to the ability of the existing SSAs and 5km buffers to accommodate 2GW of onshore wind capacity. If targets are to be delivered, it will be vital that positive, pro-active local planning policies are developed in order to accommodate 'small' and 'local' wind energy developments outside the SSAs.

12.8.12

RenewableUK agree that an integrated approach should be adopted towards planning for onshore wind schemes in addition to electricity grid network infrastructure that is necessary to transmit the generated electricity. As local authorities will determine planning applications in regard to associated development it is important that they are given priority consideration.

Given that there will be a separate consultation and determination process for the upgrade of electricity grid infrastructure, local planning authorities should be in a position to consider wind farm applications where there is a 'reasonable expectation' that the grid infrastructure will be in place. To wait until the associated grid infrastructure has been formally submitted into planning would likely result in Wales' inability to meet renewable energy targets. Due to the lengthy time periods involved, decision-making on wind energy developments should not be conditional on the submission of an application for a grid line extensions or upgrade.

In addition to considerations for upgrading the electricity grid network, PPW should note the implications of constructing multiple large scale wind farms on traffic and transport issues. The local authorities should seek to work at the earliest possible stage with developers and other stakeholders to minimise disturbance to traffic and local residents, whilst considering transportation movements as a temporary impact balanced against the need for renewable electricity.

12.8.16

The role of relevant consenting authorities and Welsh Assembly Government in processing ancillary developments that are associated to developments over 50MW is vital if strategic scale renewable projects are to proceed. These associated developments should be given priority status and responded to within the statutory planning determination time of 16 weeks.

12.8.17

RenewableUK welcome the suggestion that local planning authorities should facilitate 'local scale' renewable energy projects by setting local targets. Each local authority should recognise the contribution of all renewable energy projects towards the overall target and be obliged to make an assessment of local renewable energy capacity and set targets, the progress against which can be adequately tested in a timely fashion.

Progress towards the delivery of national renewable energy targets within the SSAs or other areas identified by individual LPAs should not prevent planning authorities assessing local scale projects outside of these areas on their individual merits.

As stated above, RenewableUK supports the Welsh Assembly Government's proposals for LPAs to identify areas within their LDPs, based on a clear and robust evidence base. However, we remain concerned that planning authorities don't currently have the resource and expertise available to identify and follow up renewable opportunities. Greater financial resource should be made available by Welsh Assembly Government to ensure that they react positively to the new requirements, and that they do so in the near term. It is therefore suggested that the Welsh Assembly Government direct local authorities to amend their LDPs to include new requirements at the earliest possible opportunity.

12.8.18

Feed in Tariffs (FIT) will influence definition of size, however it should be noted that although most community schemes will be led by FIT, there is nothing preventing community schemes being above 5MW. RenewableUK welcome the policy to support community driven projects where the benefits are returned to the host community and urge the Welsh Government to ensure the same policy is enacted on by local authorities.

12.9.1

As stated above it is questionable whether local planning authorities currently have the resources available to carry out the necessary assessment to identify the potential for all renewable resources and technologies. If they are to conduct such an assessment then greater resources must be made available by Welsh Assembly Government. If LPA are to carry out this work then it is proposed that they follow a standard and consistent methodology, such as the methodology established by the Department of Energy and Climate Change in 2009.

12.9.3

Local Development Plans should not reduce the indicative boundaries of SSAs, nor identify micro-siting criteria within SSAs if their full potential for renewable electricity generation is going to be realised. We therefore welcome the last sentence of the paragraph which cautions against local alterations to TAN8 boundaries through development plans. The SSAs

have already been identified as appropriate areas for large scale onshore wind developments and developers who proceed with projects within and outside the SSAs are required to conduct detailed assessment including Environmental Impact Assessment to show the suitability of the site before application. RenewableUK calls on the final version of PPW to remove Annex D of TAN8 and make it clear that local authorities have very limited powers to narrow the SSA areas.

RenewableUK would also object to LPA proposals to identify site-specific allocations for onshore wind developments within their LDPs.

12.9.6

There is an omission of the word 'developer' in the passage which should read "where a local renewable energy developer has identified such potential..." It is not clear why identifying schemes on urban/ industrial brown field sites should be limited solely to 'local' renewable energy developers.

12.9.7

RenewableUK welcomes the change of emphasis of placing a responsibility on local planning authorities to identify and set targets for local scale installations. However of the industry is concerned that LPAs may have resource difficulties in conducting these assessments. It should be emphasised that local authorities should consult widely with external stakeholders, including the wind energy industry, before setting any local targets or energy assessments.

12.10.1

The third bullet point should identify renewable energy 'need'. It is correct to emphasise that where targets have been met that this should not be used as a basis for refusal of an application.

12.10.3

The paragraph refers to the 'potential detrimental environmental effects on local communities' from renewable energy projects. This should be counter balanced by a reference to the potential environmental, economic or social benefits from renewable energy projects to local communities.

12.10.4

Assessing the likely impact of proposed developments on existing generation should not in itself prevent projects from being permitted. For example SSAs have been identified as being suitable for several developments of onshore wind farms and their potential shouldn't be limited by an impact assessment. A wind farm application should not be refused if it has a slight negative effect on an existing project as the new project might give greater and longer term benefits to renewable energy generation.

12.10.5

In the last sentence of the paragraph insert 'or near to the site of' so that it reads "*Provision for renewable energy generation from micro-generation equipment should be encouraged in or near to the site of new and existing development...*"

12.10.6

RenewableUK supports the sentiment that local communities and the public as a whole need to see and understand the benefits that come from renewable energy generation. However it is not appropriate that the draft PPW identifies examples of conditions or obligations that planning authorities may apply.

It is confusing that the paragraph jointly identifies the use of voluntary community benefits, Section 106 agreements and Community Infrastructure Levy despite each being a different issue. It is of concern that the section instructs local planning authorities to consider community benefit when considering an application since community benefit funds are voluntary and have no bearing whatsoever on the planning process.

In regard to the third bullet point it should be acknowledged that works to enable delivery of large components to site such as wind turbines are not necessarily temporary as they may be required to be left in situ for the operational life of the project and to allow for maintenance and decommissioning. Highway benefits in terms of passing places or land-take, and alterations

undertaken on bends and new sections of track and road, should therefore be taken into account.

RenewableUK are strongly opposed to the last bullet point that suggests giving local communities free or subsidised energy. This suggestion undermines the Government's own message and policy of increasing energy efficiency and reducing energy consumption. It is likely that such an initiative would encourage increased energy usage and hence more emissions and energy inefficiency. Whereas investing in efficiency through community benefit funds is appropriate, suggesting that free or subsidised energy should be offered does not sit well with the issues of fuel poverty, environmental or economic considerations. This paragraph should be reviewed and the last bullet point removed.

Please contact us if you would like further clarification or input to the consultation:

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