

Adcock, Andrew (EPC Planning)

From: Simon Power [simon-j.power@arup.com]
Sent: 15 September 2004 09:55
To: Andy Bull; Williams, Martin (OCTO); Adcock, Andrew (EPC Planning)
Subject: Facilitating Renewable Energy - Wrap-up meeting

Ok by me. I'm at Taffs Well in a meeting from 2.00pm, but I'm sure I'll be back. I've booked a room at our office - ask for myself or Janette (who will also be attending).

It would be good to have a Agenda of sorts based upon the write-ups of the meetings we've had and your wider thoughts. An outcome of our meeting (I guess) would be a short note/report on the issues the TAN needs to address following the meetings and what works would be needed to address the issues.

From our point of view, I have checked the finances and what with our completed 1:50000 map production etc. you only have about 1-2 days of Arup time left. The main thing from our point of view is how you best use that time (you don't have to of course!).

Looking ahead, I see the next thing being the preparation of a brief/specification for additional consultant assistance for the further development of the strategic areas and/or any other workshops to assist with this task. We would be happy to work with yourselves in this exercise, even if you had to let a tender for the work. Our view however is that the exercise is a bit open-ended at this stage making it very difficult for any consultant to offer a lump sum for the works. This next piece of the work could also include taking the key parts of our work and turning them (with some additional work) into an SEA.

Regards
Simon

Simon Power
Associate (Environment and Planning)

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-----Original Message-----

From: Andy Bull [mailto: andy.bull@powys.gov.uk]
Sent: 15 September 2004 09:08
To: Williams, Martin (OCTO); 'Simon Power'; Adcock, Andrew (EPC Planning)
Cc: Andrew Bull
Subject: Re: SSA shape files

And finally - fine by me. Simon's office?

Andy

----- Original Message -----

From: "Williams, Martin (OCTO)" <Martin.Williams@Wales.GSI.Gov.UK>
To: "Simon Power" <simon-j.power@arup.com>; "Adcock, Andrew (EPC Planning)" <Andrew.Adcock@Wales.GSI.Gov.UK>

Job title	Facilitating Planning For Renewable Energy	Job number
		115399
cc	Andrew Adcock - WAG Planning Division Andy Bull - WAG Planning Martin Williams - WAG OCTO	File reference
		4.70/5.60
Prepared by	Simon Power x 6593 (WAC)	Date
		9 September 2004
Subject	Treatment of the South Wales Valleys Strategic Areas and Common Land	

Andrew/Andy/Martin

Yesterday's cross-examination by NPTCBC has got us thinking.

Firstly to clarify

- The MOD radar area on Ynys Mon is missing from Figure 5.2 of our report.
- We have used Coniferous Forestry as the proxy for accessibility, however the only digital dataset available to use was the Forestry Commission estate.
- Latest estimate of the capacity of Area F is around 275-300MW, not 350MW as previous indicated.
- The outer boundaries of the strategic areas linking areas of potentially developable land are arbitrary, and in the South Wales Valleys could be drawn a number of ways.

Treatment of Common Land

- Common land has been used initially as an elimination layer, in that the "White unconstrained" land shown in brown on Figure 5.5 (Map 7) of our report are the areas **not** covered by common land. On the basis of this, most of the eastern valleys and the area to the east of Merthyr has within it only very small areas of brown unconstrained land (unlike the western valleys and the areas north of Swansea) and was therefore eliminated from further study. Where common land co-insides with other cultural heritage and environmental designations such as SSSIs (as was the case with the western part of the Denbigh Moors area), the location in question was considered absolutely constrained.
- Common land was also reviewed with respect to extent, and any smaller areas of common land i.e. <5-10km² between settlements was considered a local resource and not suitable for strategic areas.
- It is in the treatment of the larger (>10km²) areas of common land that we have been *methodologically inconsistent*. As an example, Mynydd y Gwair, in the middle of area E, is a large area common land, yet Merthyr Common/Cefn Gelligaer to the east of Merthyr, is a similar size area of common land yet is not included in Area F. I think we got confused with the large unconstrained 'white land' to the south of the Mynydd y Gwair area in the rush to get the maps out. There is also one grouping of two ridges between Abertillery and Cwmbran which could support up to 75MW, but it is on common land. If however these ridges were to be grouped with the land to the east of Merthyr, the whole eastern part of Gwent could be considered a strategic area. It depends on how far apart and how topographically separate the 'potentially developable areas' have to be before they cease to become a single strategic area. In the valleys there is no one single plateau top which alone can support a 100MW+ project, save immediately surrounding Glyncorrwg itself. Elsewhere in Wales (including Brechfa forest) this issue does not really arise because the strategic areas are so geographically separate.

In view of the above I believe to be objective and methodologically consistent, we have to either remove Mynydd y Gwair from Area E, or extend Area F eastwards. I therefore suggest we discuss further.

Job title	Facilitating Planning For Renewable Energy : Meeting the Target	Job number
cc	Andrew Adcock - WAG Planning Andy Bull - WAG Planning/CCC Martin Williams - WAG OCTO	File reference 4.70
Prepared by	Simon Power x 6593 (WAC)	Date 6 September 2004
Subject	Additional work on Strategic Areas	

Just some thoughts on the next steps

The TAN 8 process needs to distinguish between what the land use planning system is capable of determining, rather than further technical assessments *per se*. In other words, would wind turbines at location x be a suitable use for the land ?

It would be expected that developers would determine the technical and economic feasibility of the areas in question (although as discussed there may be merit in a further OCTO study to this effect to aid WAG credibility). As a minimum however it should be possible to plot the wind speed data already available at 1:25000 scale to view against the strategic areas to further inform broad technical and economic feasibility. Further data on grid and MOD would be gained through wider TAN 8 consultation

Hence the next stage review of the draft strategic areas by WAG/LPAs should attempt to answer the question in the negative, by determining if there are other landuse factors that cut across the potential allocation/designation of part of the area.

It is suggested that these are the following:-

Factor	Work needed
Site Access	Discussion with Local Highway Authority/Site visit/Further study of OS Maps. Existing data is available on size of vehicles etc. from developers
Effects on birds	In confidence discussions with RSPB Cymru
Nature Conservation	Review of SSSI designations, discussions with CCW and County Ecologist – review of Biodiversity Actions Plans and Site of Nature Conservation Interest.
Landscape and Visual	Review of existing County-level designations, LANDMAP information, discussions with CCW and County landscape officer. Presentation of existing visual data relating to National Parks/AONBs/Wildlands/National Trails at 1:25000 scale
Amenity/Noise	Further review of properties at 1:25000
Landownership	Discussions with Forestry Commission, Dwr Cymru
Cultural Heritage	Discussion with Cadw

This could be determined in advance of any workshop and the data presented as a summary map for discussion.

In principle, this could be achieved in say 3 days per strategic area (one day field work and 2 days consultation and desk study), although it should be possible to combine some consultation meetings either by region or by topic. Thus this gives a very approximate estimate of some £10-15k for all-Wales. Attendance at the actual facilitated workshops by a consultant would be additional to this estimate, but might not be necessary if the above exercise is undertaken in advance and (say) Andy B is involved throughout.

Our ref 115399/SP
File ref 5-60
Date 22 July 2004

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Andrew Adcock
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ARUP

Dear Andrew

**Facilitating Planning for Renewable Energy in Wales: Meeting the Target
Draft Final Report: Contracts 105/2002 and 269/2003**

Please find enclosed 1 No. set of 1:50000 plans of the Draft Strategic Areas. These have been further developed to assist in the consultation workshops. The inner red-line represents what we consider to be the 'potentially developable area', the outer two artificial blue and black lines indicate where one might choose to draw the revised TAN 8 boundaries for the various areas to assist with planning flexibility.

By all means ring to discuss.

Yours sincerely



Simon Power
Associate

Enc

Our ref 115399/SP
File ref 5-60
Date 22 July 2004

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Andrew Adcock
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Dear Andrew

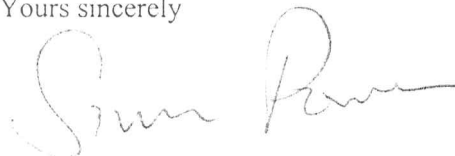
**Facilitating Planning for Renewable Energy in Wales: Meeting the target
Draft Final Report: Contracts 105/2002 and 269/2003**

Please find enclosed two copies of our Draft Final Report for the above contract (one for OCTO).

I would be grateful if you could now please consider the following:

- whether the report is a fair reflection of the various stages of work undertaken and whether there was anything else you were expecting to see in the reporting.
- whether the report presents useful additional data/reference source for Local Planning authorities in support of the TAN 8
- dissemination requirements
- mechanism for sign-off of the report and the collation of WAG comments. Ideally we would like an overall WAG response to the Draft document co-ordinated through yourself, rather than individual comments from the various officers of OCTO and Planning Division
- whether TAG comments will be sought before sign-off
- presentation format i.e. will there be a WAG cover, amount of colour to be used etc.
- translation requirements; our starting point is that we could only realistically afford to translate the Executive summary (the main report is over 30,000 words excl. appendices.)
- electronic publishing requirements
- the contract for 105/2002 requires us to produce 30 hard copies and we have given a price for 100 further hard copies in our 2002 tender. On previous contracts we have reduced this number by putting all reports, appendices and figures onto CD-ROM and issuing these. We would strongly wish to go down this route if possible to save costs and ease reproduction.
- dates for the completion of the contracts.

Yours sincerely



Simon Power
Associate

cc Martin Williams - OCTO

Briefing for Detailed Landscape Impact Input into "Areas of Search"

Background

The relevant Ministers of the Welsh Assembly Government have now agreed a target for on-shore wind.

The Office of the Chief Technical Officer (OCTO) has compiled information that includes known sites of interest to developers and grid capacity availability and planned improvements. This information can be overlain onto the currently mappable parts of your recommendations and very broad conclusions drawn.

The Next Stage

Using all of the information currently available it is possible to narrow the broad areas of search for larger wind power proposals in Wales. There is, however one key element missing from the equation and other areas that need to be refined. It is proposed to undertake a joint Planning Division/OCTO/Arups exercise to provide that missing information in order to provide Ministers with recommendations for an all-Wales Areas of Search for major wind power developments.

Brief for the Joint Exercise

1. Undertake a desk exercise that takes currently available information (including the landscape assessment work already undertaken for Powys/Ceredigion) that clearly identifies those areas that need to be visited to assess (in very broad terms) the capacity of the landscape to accommodate medium to large wind power proposals. (This is likely to be Heads of Valleys/NW Carmarthen, Northern Mid Wales, Central/East North Wales).
2. Jointly visit the identified areas in order to assess landscape capacity and therefore to refine the landscape constraints map.
3. Make a series of recommendations in respect of relevant "buffer" constraints. In some cases this will simply involve refining the variable buffer information for National Parks already included in recommendations. In other cases cumulative impact might be the issue. There may well need to be some recommendations made in respect of National Trails. This too will be assessed during the field visits.
4. The ultimate objective is to accommodate the Minister's stated target ~~(800MW)~~ for onshore wind in the best/least damaging, but economically/technically realistic way and provide a list of "relaxations" to the buffer type constraints that will be necessary in order to realise it (should this be the case).

Adcock, Andrew (EPC Planning)

From: Simon Power [simon-j.power@arup.com]
Sent: 11 June 2004 17:22
To: Williams, Martin (OCTO); Adcock, Andrew (EPC Planning)
Cc:
Subject: RE: TAN 8 - National park Buffers- Area A modification.



Map 10a strat A.jpg



areaarevised_2004061
1165424.pdf...

Dear Martin/Andrew

In light of the recent GIS visibility analysis from the National Parks, recent site visits and a review of the cumulative 'variable constraints' present with the western end of Strategic Area A (principally SSSI and Common Land) we would recommend an alteration to the boundary of Area A.

See maps enclosed.

We would propose that the strategic area be drawn back eastwards to a line roughly along the A453. You will see from the map enclosed that this actually makes only some 50-100MW difference to the current capacity estimate for Area A, the bulk of the resource lying to the east of the area, within and adjacent to, the Clocaenog Forest and Llyn Brenig.

This would be consistent with a National strategy that ignores visibility from the National Parks in the first instance in strategic site selection for target delivery; yet reintroduces it as a moderating factor in those areas identified as being most visible and which are also moderately constrained in other respects. The bottom line being that this area can be reduced in size without too much effect on the target. It should however be noted that much of the area adjacent to the Clocaenog Forest and Llyn Brenig is still also highly visible - but in a unquantifiable way may well be far enough away from the most sensitive areas of Snowdonia NP to provide some visual mitigation.

I trust such an approach still accords with the brief as set by OCTO ?

Regards
Simon

Simon Power
Associate (Environment and Planning)

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-----Original Message-----

From: Williams, Martin (OCTO) [mailto:Martin.Williams@wales.gsi.gov.uk]
Sent: 11 June 2004 16:05
To: 'Simon Power'; Adcock, Andrew (EPC Planning)
Cc: Griffiths, Lynn (OCTO)
Subject: RE: TAN 8 - National park Buffers

Thanks Simon. Clarifies considerably. Andrew - should we discuss how to take this forward?

Table 17: Recommendations for ZVI in Relation to Overall Height.

Height of turbines (total including rotors)(m)	Recommended ZVI distance (km)
50	15
70	20
85	25
100	30

<<visibilityver2.jpg>> <<WF GuidanceF01AA303B.doc>>

It is suggested by the SNH work that it becomes almost impossible to define at what point the turbines move from being "dominant/Prominent" to "Inconspicuous." (see table 18 below for terms (after SNH)), the issue being very subjective and very dependant upon site conditions, landscape etc.

Table 18: Size Classes, Names and Descriptors for Visual Effect (Magnitude)

Size Class	Name	Descriptors - appearance in central vision field
Modifying Factors (Figure 2)		
Very Large	Dominant	Commanding, controlling the view Few
Large	Prominent	Standing out, striking, sharp, unmistakeable, easily seen Few
Medium	Conspicuous	Noticeable, distinct, catching the eye or attention, clearly visible, well defined Many
Small	Apparent	Visible, evident, obvious Many

Limit of Potential Visual Significance *

Very Small	Inconspicuous	Lacking sharpness of definition, not obvious, indistinct, not clear, obscure, blurred, indefinite Many
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Limit of ZVI *

Negligible	Faint	Weak, not legible, near limit of acuity of human eye
Few		

Hence we recommend in the light of this latest and most comprehensive research yet undertaken to date into the subject within the UK that the Welsh Assembly makes no use of generalised buffer zones around the National Parks in TAN 8, either directly or indirectly. We appreciate this runs counter to our original work in 2002/2003 but we now have new research (and have carried out our own visual modelling by the GIS) which supports our changed view.

The strategic areas as defined are generally around 4km from the National Parks, but this is a purely practical outcome based upon topography, wind speed etc. and may or may not provide some limited visual protection depending on the location and the National Park concerned. The imposition of the visibility analysis on the strategic areas (as demonstrated in the enclosed figure) makes this point i.e. a 4km buffer may assist (to an unquantifiable degree) in reducing visual impacts from large turbines in the South-East of Snowdonia but is likely to have little or no quantifiable visual benefit to the east of Snowdonia or in the south-west part of the Brecon Beacons. 100m turbines may still be "prominent" in these areas when viewed from the edge of the National Parks at 4km.

The only other option I can see to put to ministers is to change our brief so that we are to advise on target delivery in a context of limiting or minimising impacts upon the National Parks and with a slightly variable target. The implication of this is that parts of the strategic areas A, E and F would be removed from our draft TAN map.

Regards
Simon

Simon Power
Associate (Environment and Planning)

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Map 10a: Detail of Strategic Area A and possible major windfarm sites



Area A

Dembyl Mours

Est Capacity = 200MW

4/6/04

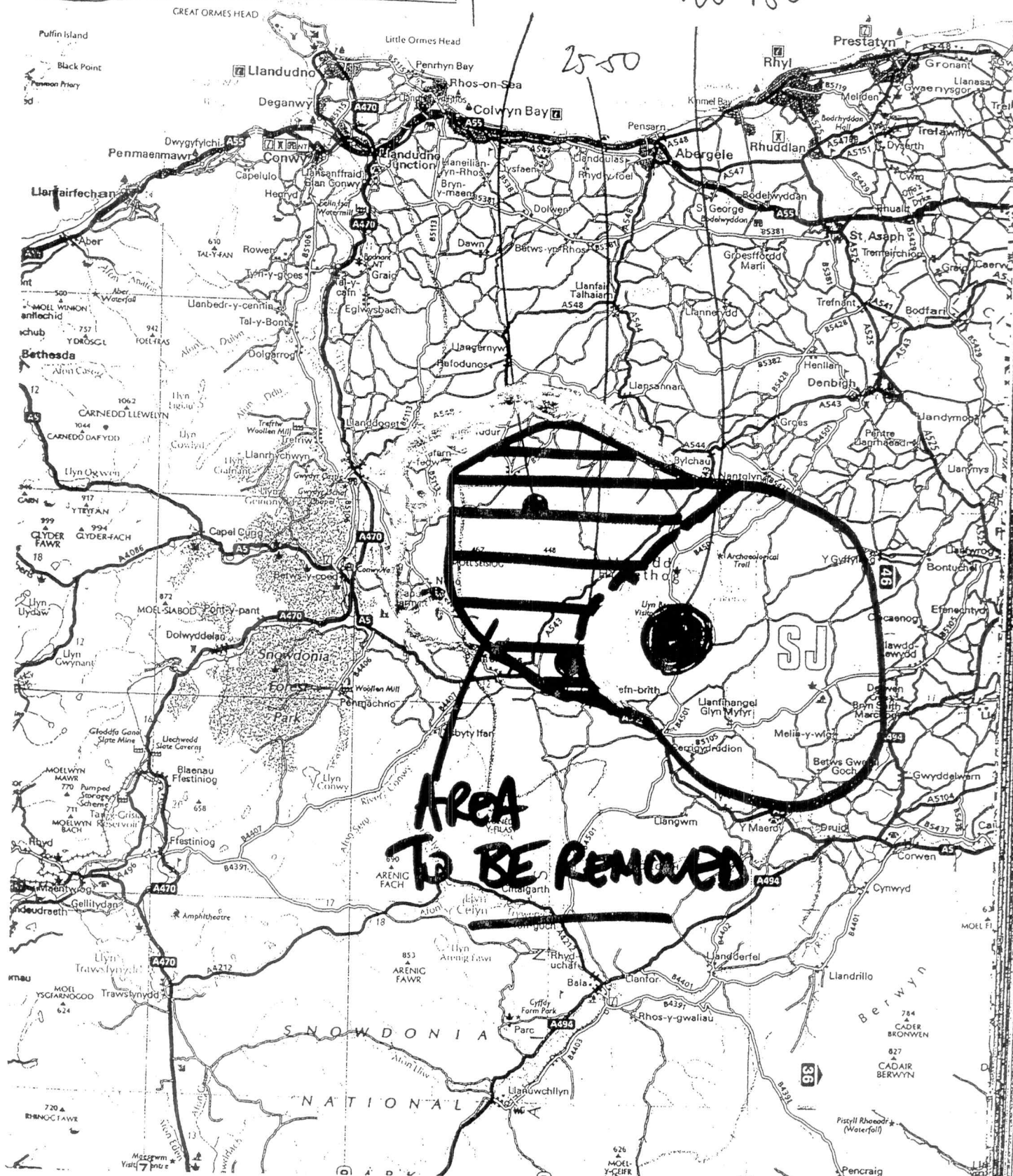
A

45

25-50

100-150

46



Adcock, Andrew (EPC Planning)

From: Simon Power [simon-j.power@arup.com]
Sent: 04 June 2004 16:49
To: Williams, Martin (OCTO); 'Andy Bull'; Adcock, Andrew (EPC Planning)
Cc:
Subject: Facilitating Planning for RE - Meeting the Target - Strategic Areas - Version 5



0005Strategic Areas
Criteria.doc...



stratareasver5_200406
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0406041...

Dear Martin, Andy and Andrew

Please find enclosed our latest summary and detailed maps of the proposed strategic areas for onshore wind development in Wales to 2010. These still need some minor validation but have been updated to reflect the latest grid discussions and an initial environmental review at 1:50000 scale.

We have indicated at this stage an overall Welsh capacity some 30% greater than that required to achieve the 800MW of onshore wind required by the brief, to allow for some loss in the consultation on the TAN and in our final refinement. As discussed it may well be worth assigning a 'minimum capacity' to each of the areas similar to that indicated.

I also enclose a note on strategic area definition criteria for discussion/comment. <<0005Strategic Areas Criteria.doc>>
<<stratareasver5_20040604151714.pdf>>
<<stratareasver5detail_20040604151805.pdf>> .

Regards
Simon

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Criteria for Draft Strategic Areas

- Comprise a broad area ($>10\text{km}^2$) that has no absolute constraints (as defined in project methodology)
- The area should have relatively few 'variable' or second order constraints (as defined in project methodology) or the latter are limited in spatial extent Has a 'land capacity' for a minimum of 100MW of onshore wind (at a density of between 4 and 9MW/km 2)
- Has at least 2 separate prospective wind farm sites within it
- Generally encompasses either an existing wind farm or at least is within the cumulative impact buffer distance of one. However areas G and parts of E are the exception to this.
- Has positive siting factors (as defined in project methodology) in at least part of the area
- Has either a) existing grid capacity of >100 MW or it has been demonstrated that either a) the area is within economic connection distance for a private developer to an area with grid with capacity >100 MW or b) the regional distribution operator is proposing to provide grid capacity of >100 MW to the area by 2010.
- Where possible the areas span more than one Unitary Authority
- The edge of the area is greater than 4km from the boundary of a National Park
- Contains significant areas with very few isolated dwellings

The capacity of the strategic areas is generally indicated as slightly less than that which may be calculated from theoretical modelling because

- We have used wind speed $>6\text{m/s}$ as the wind criteria, however many areas will contain hollows with wind speeds less than this or certain sites may only be viable with wind speeds > 6.5 or 7m/s
- We have generally assumed that turbines can be located in major conifer plantations, however not all forestry areas are Forest Commission owned, not all forest will be at a height to allow turbines to sit within it and some developers may not propose turbines of a height sufficient to clear the trees
- Site access has not been evaluated and both the local highway network and some forestry access tracks may not be capable of taking the turbines or cranes required.
- In planning and EIA process some turbine sites will inevitably be 'lost' as a result of negotiation with the Local planning authority over siting and layout
- There will be some individual properties not detected at the level of study undertaken.

Smith, Joanne (TPE)

From: Simon Power [simon-j.power@arup.com]
Sent: 18 December 2003 16:24
To: Smith, Joanne (TPE)
Subject: Facilitating Planning For Renewable Energy and the SEA Directive

Dear Joanne

It would be quite good for us to be able to say that our research forms the first step in the Assembly undertaking a Strategic Environmental Assessment of the onshore plans/programmes required to meet the 10% Renewable Energy Target in Wales, broadly in accordance with the SEA Directive 2001/42/EC. I appreciate we do not 'assess' each of a range of possible onshore wind scenarios in a formal sense but the likely effects of a range of options were discussed at some length (together with alternatives) at the various steering panel meetings. We did explore cumulative impacts, the effects on the environment and measures envisaged to prevent etc. adverse effects. Wildlands could be seen as a monitoring exercise as well.

Any views ? Also now that ODPM have published Guidance for Planning Authorities on the SEA Directive, any details on when such guidance will be published both for Welsh Local Authorities and various Assembly Departments ?

Regards
Simon

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Llywodraeth Cynulliad Cymru
Welsh Assembly Government

Simon Power
Arup

Eich cyf . Your ref
Ein cyf . Our ref

29 August 2003

Dear Simon

Comments on final report

Here are some detailed comments on the final report which we discussed in more general terms at the meeting of 29 August. Your email summary picked up most of the general considerations and I won't repeat these here, except where they reinforce any of the comments below. I apologise for the delay in getting these to you.

P 4 (Executive Summary): may be worth making the point in 6th paragraph that wind was considered to be the key technology which requires a strategic approach.

In Paragraph 7 could explain a little more about how these issues could be treated given their variability.

P 5 Paragraph beginning "With the information...." need to insert "be" between 'should' and 'possible'.

P 11 last sentence of energy policy section, should read "wind energy is most likely to contribute substantially" as per Andrew Davies's Statement of 26 February 2003.

P 12 In the last paragraph it may be worth noting that the TAN could encourage the use of other technologies i.e. the planning system can be proactive but that this report will consider those subject to realistic planning pressure.

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P39 Would "level of interference with civil electromagnetic communication be a consideration" where telecom masts existed?

P41 Title. I assume "Initial" means the first thing developers think about ie key technical considerations? If so I'm not sure "wildlands" should be here, rather they could be in the next one, as they re a potential means of monitoring the overall impact of windfarms on rural Wales (and help to counter windfarm on every hill type arguments).

P41-43 The three constraints are also variable and therefore it may be useful to draw out more clearly what planners can and can't do with these issues. They cannot alter them but need to work with them.

P43-45 Wildlands. Need to identify the benefits and pitfalls more clearly. The approach depends on:-

- wildlands being identified - but by whom and at what level - regional or local
- Wildlands being monitored - at what levels (s).
- Wildlands being monitored at a national level - 40% threshold - eg grade 5 as a useful proxy at national level?

Chapt 8. define parameters for applying the tiers in an "implementation chapter", considering how the sequential application of the tiers would work and whether there needs to be a threshold for consideration of alternative sites.

Chap . Need to consider how this relates to the tiered approach - and that it would be for lpas to do.

P57 Low capacity Landscapes - we would need to be clear how landscape assessment relates to wildlands - again linked to who does what and at what level.

Chapt 10 As discussed there is a need to strengthen this and link to existing chapter 13 as part of an "implementation" chapter.

Part C. As discussed this interrupts the more strategic and proactive consideration and could be included as an annex.

P 66 would need to see updated table re M Hill.

Chapter 13. As discussed t the meeting this, along with 10, are the key chapters and should be more closely integrated and a more complete summary of the tool and its operation outlined.

P72 (13.4) Outline, as per earlier comments, what should be done nationally, regionally or locally etc.

Chapter 14. Would need to be strengthened in line with the comments above.

Yours sincerely