

Smith, Joanne (TPE)

From: @wda.co.uk
Sent: 09 June 2003 12:46
To: Jillian Hastings
Cc: 'Andy Bull'; Morgan, Chris G (TPE); @geodata.soton.ac.uk';
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@care4free.net'; @ccw.gov.uk'; @dulas.org.uk';
@westcoastenergy.co.uk'; Simon Power; @flintshire.gov.uk';
@rspb.org.uk'

Subject: Re: Facilitating Planning for Renewable Energy - draft final report



ATT823853.txt

Jillian,

Thank you for the above. I am very disappointed to note that despite our taking considerable time to read what we were told was a "Final Draft" we are now being asked to review another significantly extended "Final Draft" issued on 4/6 for a meeting on 11/6. It is not possible to do this work justice in the circumstances.

I refer to my comments on the last draft also those of others including NWP and BWEA regarding many of the same issues particularly related to the figures used to project turbine and target capacities which remain incorrect and which are developed further in the new extended version of the final draft.

I have read this document once over the weekend and am still not in a position to comment on its contents, however, in view of the considerable additions that have been made, I will endeavour to read it again and respond at the meeting on Wednesday. I doubt in the circumstances that we will be able to come to any constructive conclusions within the time scale there are still many fundamental issues requiring resolution within this document.

Having taken the time and effort to provide my comments once particularly on issues which are fundamental errors on calculations I am beginning to ask myself what the point of all this and why this had to be altered in this way after the final draft was prepared.

Regards

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WDA RESPONSE TO ARUP DRAFT FINAL REPORT -FACILITATION PLANNING FOR RENEWABLE ENERGY

1). Summary.

This report addresses largely environmental constraint issues and deals with visual impact of wind turbines in a largely negative context. This is not a balanced prospective which should also take into account the need to address Global warming, Kyoto and the wider issues of both UK and Welsh Assembly Government Targets for Renewable Energy Development. Nor does it reflect the economic development benefits to the Welsh Economy to which WAG aspires from ***the 7 TWh RE targets it says will be essential to meeting its Carbon Reduction aspirations.***

The tool as proposed are too broad brush due to a combination of factors; the use of vector mapping, the combination of only 3 Land tiers and the expansion of buffer zones. As a result ***there is a real risk that the proposed Renewable Energy Targets will not be met.*** The landscape issues are not sufficiently developed and are not based on verifiable evidence. Whilst there appears to be an abundance of tier three land, this can only be relevant as a resource if other relevant issues including; viable fuel resource, site suitability (accessibility, proximity to habitation etc.), and grid connection potential are factored in to this. Whilst it is not possible to predict future availability of grid/ network capacity, there is a need to work with NGC and DNC's to endeavour to achieve convergence with the strategic planning of these or developer pressure will be solely driven by the availability of access to the existing network where suitable sites can be identified.

Terms of Reference for the report for the development of all renewable technologies has not adequately been considered. It is right to assume that hydro and other emerging technologies are unlikely to be relevant to the life of this TAN. However, it must reflect the limited role of biomass, which will impact on the current TAN lifetime, and will have significant rural implications not reflected in current industrial planning guidelines.

The validity of the term "Wilderness landscape has no valid basis as a planning constraint for wind farm development; within this context this seems to supplement the existing role of National Parks. The current proposal that a percentage of this would have to be constrained from future development, even if it were to be adopted would require considerable more work and clear definition, it is far too ambiguous at present.

The National Park and trails already have boundaries, the continuing expansion of these together with those of exclusion zones around wind farms now proposed at 20km is of concern, my own direct experience of specific sites suggests that the quality of landscape work carried out has been extremely subjective and requires considerable further work. Specific comments are set out in detail below.

2). Detailed Response

- | | |
|------|---|
| Pg 2 | My understanding of the remit for TAN 8 was to develop a decision support tool for use by Unitary Local Authorities for the planning of Renewable Energy. The proposal that the 'tool' could become a strategic decision-making policy would require considerably more evidence based and balanced work across all of the issues. |
| Pg 5 | The precise Welsh RE targets should be represented accurately and in full in accordance with the Economic Development Ministers response to the EDC Review report on renewable Energy and the report should take this into consideration in a balanced way. |
| Pg 6 | Use of the term spatial is inaccurate within the TAG and the planning tool. References are generally specific to location requirements, which in this draft report address largely environmental and |

physical constraints only. Spatial is defined as in the Wales Spatial Plan consultation as follows "**location of human activities to contribute best to meeting environmental, social and economic needs**". The adoption of his specific definition would address the obvious imbalance in the report between sustainable and economic development issues and other wider environmental benefits related to carbon reduction and global warming etc.

- Pg 9 Table of Geographic distribution of wind farms in Wales is inaccurate (see detailed table attached at the end of this document. (Source British Wind Energy Association).
- This concludes that "a planning tool is required for onshore wind technology" with reference made to "this being currently addressed on a piecemeal basis as they arise and without a strategic overview of their potential impact" This is largely a factor of site suitability and grid access neither of which are adequately addressed or recognised in the report so far. Thus there is unlikely to be any material change resulting from the adoption of this report other than a distinct possibility that this will severely limit future development in Wales and thus the ability to meet WAG targets.
- Pg 10 The capacities of 2 North Wales offshore wind farms are wrong, (North Hoyle to be built as 60MW and Rhyl Flats 90MW).
- Pg 11,12 Reference to Biomass targets refers to the role of heat which is not included within WAG targets. These are solely based on generation of electricity. Reference to typically generating 10- 34MWe per scheme is wrong. Schemes currently promoted are typically between 5 and 25MWe with projects as small as 75) KWe proposed.
- There are no available SRC crops within Wales at present and work is ongoing to determine suitability of crops for growing here. Small round wood is available to a very limited degree but its cost does not make it economic for biomass fuel.
- There is a limited economic fuel source within Wales "Co Product" from timber mills, saw mill and furniture industry saw dust residues which can be economic within a limited geographic radius of the plant. There are 2 current projects likely to go to planning soon (5 & 10MWe and one at Newbridge on Wye (15MWe) caught up in a planning enquiry already. As in Newbridge on Wye, the application of Industrial planning criteria is a problem in rural sites which are likely to be adopted increasingly because of the economics of fuel transport.
- Pg 13,14 Reference to the credibility of tidal lagoons being boosted by a report from AE technology, this is incorrect, the report this refers to clearly qualifies each chapter with an inability to verify the data which the aspiring developer provided and the need for considerable further work to be carried out before the calculations provided can be verified. It is wrong to assume that these are not constrained in location to the extent suggested, they are seeking location at a diverse range of Seven Estuary and North Wales location of considerable scale, however they are unlikely to be commercially viable within the timescale of the TAN
- Pg 15,16 Tidal Stream & wave Energy references are misleading; as yet none are commercially viable technologies or are likely to be capable of commercialisation for between 5-10 years. There are, however, 3 which are at an advanced stage of development and seeking demonstration sites in West and North West Wales within the next two years. These are likely to be limited to 1-3 turbines each **within the TAN period**
- Pg 25 My understanding is that **74km is a consultation area and not a total exclusion zone**. The radar referred to is a ground based radar at RAF Valley with a considerable number of locations, particularly to the south and east in shadow due to hills, mountains etc.

- Pg 26 - 6.3 First paragraph reads technically incorrect and needs amending to read as follows;
The lower limit of commercial viability now is an average wind speed of circa 7 m/s at hub-height. Wind speed increases with height above ground level and turbines are increasing in size, consequently their height above ground is also increasing. This will increase the viability of larger areas of land making the larger turbines better suited for **larger more remote landscapes**."
- Pg 27 The definition "the grid" should be replaced with "Local Distribution Network". Except where it refers specifically to The National Grid (high voltage systems). The latter will usually only be utilised by the larger wind farms.
- It seems appropriate to reverse the sequence for Para's 2 & 3.
- Ch 4 This TAN review set out to review **all viable forms of renewable energy**. The Arup report as currently worded is seeking to constrain its remit to wind only on the pre-text that this is the only one with specific planning issues.
- The planning risk for Biomass remains a significant problem, which cannot adequately be addressed via by normal industrial planning policy. Biomass, despite recent setbacks in SRC/cash crops remains is a key element of National Government and WAG RE/Rural Policy and it will inevitably have a significant rural element because of its dependence on transport radius around fuel sources.
- Small round wood is not likely to be a significant fuel source as suggested, it is neither available in sufficient volume nor is it economically viable as a fuel source, co-product, saw mill residues and furniture industry virgin fibre residues are likely to form the majority for any initial biomass fuel supply chain. And much of the development and transport implications are likely to be in a rural context.
- Wales is likely to see between 30Mwe, and 100 MWe of Biomass generation plant within the Tan period. To date the only biomass planning application is in rural mid Wales and that is caught up in a controversial planning enquiry. Directly linked to locating industrial processes and heavy traffic implications in a rural environment.
- Ch 7 The emphasis of the report is almost all on negative impacts of wind turbines and increasing planning constraints. It does not balance this with the desirable effects of WAG Economic Development Policy for the development of Renewable Energy, or WAG's obligation to place Sustainable Development at the heart of every decision.
- It might be appropriate that Unitary Local authorities should be required to identify suitable alternative sites in the current "Tier 3".
- There needs to be further tiers, as in Scotland with 4, possibly 5 are required. This is essential to get a more balanced range of sites across Wales. These are in danger of being unable to deliver the targets set as currently proposed. The concept of Wild Lands has no validity and the basis for these as presented is addressed by National Parks etc. larger more remote sites are essential to absorb larger wind farms and bigger turbines. These are unlikely to be locate in most of the tier 3 land suggested by the report.
- The use of buffer zones has increased significantly during the period around the past two meetings with Arup. The case for this has not been adequately set out or proven With the TAG given the opportunity to discuss the need for all or a lesser degree of the constraints which where proposed. The last two meetings have largely been taken up in trying to review the consultant's presentations

and at the last meeting we moved rapidly to a significantly increased use of buffers. I believe this was claimed to be necessary because of the findings of the landscape consultants site visits in Wales.

I spend a considerable amount of time visiting a wide range of developments both within Europe and Wales and am actively involved in reviewing Sect 36 and Transport & work Acts EIA's including detailed photo montages for wind turbines of all sizes. Based on my own experience I do not believe the work, which formed the basis of these critical conclusions, was adequate.

No hard evidence was presented based on actual photographic comparison and the cut outs which were overlaid onto existing wind farm images is not a very reliable methodology. There are a number of 1.5 MWe units installed already in UK, these would have given a more credible input.

The presentation of the seascape towards Gower is a particular point with the hill at Cefyn Bryn on Gower represented as Mumbles Head. This suggested that a large offshore turbine in Swansea Bay would significantly overlap Cefyn Bryn (claimed to be Mumbles), which is very misleading. In the first instance a turbine in the foreground will inevitably appear to overlap the landscape in the background, this is not a function of scale.

Cefyn Bryn is in fact 158M high and Mumbles head is only approximately 20m above sea level. The Hill ridge behind Mumbles is circa 60 m (see photo Montague's and maps sent as hard copy).

Ch 8

In 8.3 the definition 'spatial' is again used (see ref to page 6 which conflicts with the WAG definition as defined on page 6 ref).

Ch 9

The technical constraints of radar and airports is believed to be advisory, not absolutes. (Ref Ch 7) (Ref Ch 8), the landscape consultants conclusions on turbine size against landscape impact needs more work, If the reports recommendations are to be adopted as the tool for the TAN.

Head of WDA Energy Office

Welsh Wind Farms By Counties, Turbines, NPC and Baseload (British Wind Energy Association).

Installed	Mwe	TWh	No	County	Mwe	TWh	No
Rhyd y Groes	7.2	0.019	20	Anglesey	33.2	0.087	68
Llyn Alaw	20.4	0.054	34	Anglesey			
Trysglwyn	5.6	0.015	14	Anglesey			
Parc Cynog	3.6	0.009	5	Carmarthenshire	7.5	0.020	8
Blaen Bowi	3.9	0.010	3	Carmarthenshire			
Mynedd Gorddu	10.2	0.027	17	Ceredigion	12.6	0.033	25
Rheidol	2.4	0.006	8	Ceredigion			
Hafoty Ucha	0.6	0.002	1	Clwyd	2.3	0.006	3
Hafoty Ucha 11	1.7	0.004	2	Clwyd			
Duffryn Brodyn	5.5	0.014	11	Dyfed	11.5	0.030	21
Llangwryfon	6	0.016	10	Dyfed			
CAT	0.6	0.002	1	Powys	90.3	0.237	200
Cemaes 11	15.3	0.040	18	Powys			
Carno	33.6	0.088	56	Powys			
Bryn Titli	9.9	0.026	22	Powys			
P&L	30.9	0.081	103	Powys			
Taff Ely	9	0.024	20	Mid Glamorgan	9	0.024	20
Totals	166.4	0.437	345				

Smith, Joanne (TPE)

From: Jillian Hastings [jillian.hastings@arup.com]
Sent: 28 May 2003 10:37
To: Smith, Joanne (TPE)
Subject: FW: Response to Draft Report

some more which may be of interest...

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

From: [mailto: @foecnorth.demon.co.uk>]
Sent: 27 May 2003 16:17
To: Jillian Hastings
Subject: Response to Draft Report

Dear Jillian,

I am sorry that I missed the last meeting, I have been experiencing significant work overload at the moment. I am also speaking at a Welsh hydrogen conference on the 11th June so please relay apologies for missing the forthcoming important meeting too.

The comments below are based a one readthrough of much of the text so you may feel specific comments may be a bit sharp or unfair especially if I have overlooked something:

We have concerns about the wording and sentiments in the draft. The introduction and text tends to reinforce a perception that there is widespread public controversy about the visual effects of wind energy. Comments in the introduction such as 'no less than 19 windfarms', 'further developments', 'emotive issue', often contentious' are spread throughout the text yet could be easily left out - some people have problems with windfarms and have tried to cause controversy in any above board and or underhand way possible - this report should not bow to such tactics by small numbers of individuals and groups.

Note that about 70% of the anti-wind letters in the Western Mail (2001-2002) were written by about 7 individuals. Pro-wind letters were not necessarily printed even when comments to or about named individual campaigners (including mine) were included. That is, some newspapers are or were not giving a right of reply.

Having read through the draft I do regard the tone of the wording negative to wind energy in places and very much about constraints rather than opportunities. Surely this should be a neutral planning tool that is designed to cater for whatever the public and politicians wish for as to the scale of development of onshore wind capacity.

There has been controversy about wind energy, much of which has been whipped up by a very small number of commentators but this has centred on various issues not just visual effects. Such issues include scepticism about climate change, misinformation and misunderstanding about the cost of wind energy (1. comments included), wild life and ecological effects, intermittency, spinning reserve (running at full power apparently), noise, energy payback times etc. Fortunately, prolonged public debate has exposed much of the myths and willful misunderstanding and shown that wind energy is difficult to beat in many respects. The Assembly itself has played its part in addressing the controversy generating myths in their Renewable Energy report. Again the introduction could easily be interpreted as controversy primarily about visual impact yet this is difficult to

substantiate or claim it is more than a small minority causing the controversy at present.

All polls to date, which have widely disseminated over the years show majority support for wind energy. Indeed, an independent poll FOE Cymru commissioned last year found that 71% of the Welsh public support a doubling of the 360 windturbines in Wales, only 18 % opposed. This is a near 4 to 1 majority and even in mid Wales it was 3;1 in favour of a significant expansion of onshore wind turbines. A second question found a 17:1 majority in favour of offshore wind turbines four or more miles from the coast rather than more nuclear power. We are concerned that such findings about wider, and indeed majority, public opinion are not a major theme in the Introduction.

The use of the word 'irrevocably' is highly inaccurate and completely unjustified in our opinion even if the sentence in which it appears suggests that this is a widespread attitude. Turbines can be removed in a short space of time (days) with little or any perceptible residual visual impact or indeed landscape (physical) damage. For reference, open cast coal extraction causes significant landscape damage (physical and ecological - ie landscape removal). Windturbines might only leave a slight depression and or coloration in the ground after removal. We suggest that the word 'reversible' as opposed to irrevocable would be an objective description.

Why are renewable energy developments in particular portrayed as a cause of planning controversy ? Do not nuclear power developments (built ON heritage coasts or otherwise), some roads, waste tips, incinerators, and even building extensions/demolitions give rise to significant public controversy in planning matters. Most people do not, to date, appear to be too bothered by windfarms, in most public attitude surveys. Less people are bothered after they are built, so why are such findings not discussed in equal manner to comments about this much hyped controversy. Why is there is no reference in the draft to the positive effects and appreciation of windfarms, or indeed the well documented public attitude surveys.

Beauty is in the eye of the beholder and the sight of windfarms bringing energy self sufficiency to their location are or can be an uplifting sight to many. Indeed as regards spirituality, the sooner the reductions in greenhouse gas emissions the more likely that they will reduce some adverse and fatal climate related impacts in the future*. Yet some people prefer an unspoilt view to any wind turbines - how spiritual is that ?

* CO2 has a warming effect over decades to one hundred years

In what is intended as a report on an objective planning tool the positive reception to wind energy should also be included in the text to balance the commentary about the use of the landscape resource. The so-called wide (read minority) controversy is about many things including many fictitious things.

You mention within the draft about degrees of consensus within the steering group. I am not sure how you are assessing this. Indeed, I think it would have been useful if responses to the earlier work and to this draft were circulated to the other members. I have not a clue

about the detail other people may have been writing to you about.

I have not heard all of what the developers may be saying to you but FOE Cymru would strongly suggest that the concept or planning consideration of buffer zones be given far less weight - in terms of distance and designation strength. We suggest a more detailed site

evaluation for specific scheme proposals or specific areas if and when data sets have been compiled. On the issue of the spacing of individual dwellings in some rural areas ruling out windfarm development, an issue repeatedly brought up by the developers, the draft is still vague.

We suggest that all your drafts' recommendations should be clearly separated out from the objective information content (eg buffer zone distances, 60% of 'wildlands', the concept of 'wildlands' indeed). The pros and cons of any recommendations, as expressed by steering group members, could be set out for the readers reference. As there will be public consultation of the proposed TAN 8 it would be useful to describe the effects and issues of specific recommendations so the public can decide, not us.

There is little discussion or information in the draft relating to the economic effects of windfarm schemes. For example, the farmer owned scheme near Llanrwst (Moel Maelogan) and the proposed Arts factory/United Utilities scheme in the Rhondda (possible 20 plus jobs financed by 50% profits to the Arts Factory for community training/recycling/social projects) can generate substantial income and jobs to hard pressed Valley and upland areas. So there is a spatial aspect to economic benefits. Most windfarms also generate rates for the Council, and or rent for land owners and include sometimes substantial planning gain. Jobs in turbine and component manufacture (Cambrian Engineering) and onsite construction also need to be considered.

As regards offshore windfarms, I have heard that schemes outside the three DTI/Crown Estate areas will not be passed at this stage. If this is true then the capacity of offshore schemes to provide one third of the 4 TWhr benchmark may be in question. The North Hoyle scheme is likely to be only 60 MW, Rhyl Flats may be 60 MW or 90 MW, Scarweather if passed may be 90-108 MW. Overall the three first tranche schemes capacity could be a possible minimum of 120 MW to a maximum of 258 MW approximating to 2% - 4.5% of Welsh electricity demand (4 TWhrs is approximately 20% of demand). So there could be a shortfall in offshore wind capacity to 2010 unless another tranche is allowed. This needs to be checked.

Also, some marine current turbines (which may have a visible access tower of about 10 meters) may feature within the TAN 8 period to 2007. There is a high marine currents of the north coast of Anglesey along the Heritage Coast.

In 9.5 would not some photomontages illustrate the point in question (about height of turbine to scale landscape features).

In 10.2, the Government's greenhouse gas reduction policy incorporates renewable energy targets and transport targets etc. Having more regional or local CO2 targets which attempt to achieve CO2 reductions without renewables could send the debate anywhere. We strongly suggest that renewable targets are kept. This issue is just another version of the energy efficiency as opposed to renewables argument. Wales and the world need both energy efficiency and renewables in significant quantities. Energy efficiency progress is severely undermined by the low cost of energy (and we campaigned for EE for about 20 years!). The fact that onshore wind energy is about the cheapest large scale renewable is why we are having the current debate.

In the section entitled 'Mid Wales Site Visit' we cannot agree that 55 meters to blade tip should be a maximum if this is what is being suggested by the three people. The 1.3 MW Moel Maelogan turbines are (much ?) higher and attracted a crowd of over 1,000 people at the open day and there has been little local controversy. Let the public decide,

not small groups of specialists who may have their own agendas.

There is little reference made to the possible repowering of existing schemes. If a windfarm owner understands that higher turbines could be located in place of the existing turbines then this could make a large difference to the need for schemes to be located elsewhere to reach a given target. For example a 1.3 MW turbine could replace 4 of the 330kW turbines - possibly at Llandinam - worth checking.

I will contact some of the other steering group members to see how they are thinking about the draft and will try to make further comments and suggestions before the next meeting.

—
Campaigner
Friends of the Earth Cymru

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Smith, Joanne (TPE)

From: j@aber.ac.uk
Sent: 27 May 2003 08:41
To: Morgan, Chris G (TPE); Smith, Joanne (TPE)
Subject: ARUP report on RE planning tool



Facilitating Planning
for Re...

Dear both

Please find attached my comments on the ARUP report. I've emailed Jillian directly as well.
regards

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Facilitating Planning for Renewable Energy
Comments on ARUP draft report May 2003
Ruth Stevenson

Page 2a. The brief for the project indicated that the planning tool was "to be used primarily by Local Authorities to *positively* provide for and facilitate renewable energy development". Unfortunately the tone of the draft report is very negative and deals primarily with constraints. Simon did mention that he might try to address this by including a Tier 4. This would help, and the whole report needs to be scanned to ensure that a *positive* message is being given to the LA's.

Page 2b. The brief for the tool included social and economic issues – these have been abandoned in the report in favour of environmental (primarily landscape) issues. Whilst I understand that these are often the most controversial issues, by ignoring the social and economic aspects of a project, the report diminishes the value of RE projects in these areas, and I suspect, leaves open the same old problem of weighing up the value of wider economic, environmental and global issues against the local landscape values.

Page 6. section 3.3.2. The report here does not mention hydro in its list of technologies considered to be likely to experience planning pressure over the next 5 years. However, the technology is mentioned in section 4.2. I think it deserves to be listed in 3.3.2 as a viable technology.

Page 10. Section 4.2.3 If SWALP were to be used to identify sites for small hydro, the whole of Snowdonia Nation Park (the area with the best hydro resource) would be ruled out. This needs to be thought about and decisions made at an assembly/TAN 8 group level.

Page 13. I think _____ form the FC said that there were quite a few viable (but small) schemes coming through to them. This might need checking.

Page 21. The environmental impacts should include emissions reduction potential of RE schemes. Economic impacts should also be mentioned here. (Another place where some more positive messages would be useful and avoidance will lead to public Inquiries to discuss the merits of the value of the scheme.)

Page 25. _____, referred to this in the meeting – There is a need to check the report to ensure that wind developments are not used as a proxy for RE developments (we all do it!).

Page 28. The tiered approach works quite well, in my view, but a Tier 4 should be added, where there would be "no constraints that would limit wind farm development providing " or even "where there would be a presumption in favour of windfarm development provided...." !

NB Does anyone know about the current discussions around redrafting PPG 22? It might be worth finding out if we can!

Page 31. I feel there is still a discussion to have regarding the appropriateness of the dispersal approach versus one or two large windfarms, together with small (3 -5 turbine sites).....

Page 33 If we limit developments to smaller turbines we will need more turbines! Most applications coming in now are for turbines much taller than 55m high.

Page 34 What about industrial seascapes- should we still have the 10km distance requirement? Also, as I understand it, most developments are proposed within 10km of the coast!! Could be a problem if we're setting a 10km distance requirement.

Page 43 Effectively we already have a preferred areas system in place-developers already avoid National parks and are wary of AONB's etc. What is missing is the onus on the LA to contribute to a certain % of RE electricity / energy production or carbon dioxide reduction target etc. This is the important thing!

Page 48 LPA's might be reluctant, but are they not already required by PPW to identify RE potential in their areas, and aren't the WAG going to make that even more of a priority for them??

Page 50 I would support option 3 under 9.4.1!

Page 51 Table 9. I wonder if the recreational route criteria is too constricting. How about a situation where a windfarm is proposed where all other issues are OK, but there is a substantial adverse effect on 1km of a recreational route. Is this sufficient reason to turn the application down?

Page 53 Landscape is not the key issue for hydro schemes! Need to look at wording re RE and windfarms proxy.

Page 53. Recommendations. Whilst I agree that there is still more work to do at a regional level, I think the important thing is that there is a positive message from the WAG now and a requirement to assess RE potential for each LA. Maybe the WAG can help with this and I agree that a "strong political steer" is necessary.

Smith, Joanne (TPE)

From: westcoastenergy.co.uk]
Sent: 27 May 2003 15:49
To: jillian.hastings@arup.com
Cc: -mail); Smith, Joanne (TPE)
Subject: Facilitating Planning for Renewable Energy-draft report



Facilitating Planning for
Rene...

Dear Jillian

Please find attached comments submitted on behalf of WCE. Hope they are of assistance.
Best Regards

<<Facilitating Planning for Renewable Energy TAN8 230503.doc>>

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Facilitating Planning for Renewable Energy

Consultation Draft – Final Report

Comments of West Coast Energy

1. Introduction

Reference is made to the Welsh Assembly Government (WAG) recommending that by 2020 some 20% of electricity produced in Wales should come from renewable sources. I think this is incorrect. In its review of energy policy in Wales (January 2003), the Economic Development Committee recommended that by 2010, some 10% of Welsh electricity production (4TWh) should come from renewable sources. The Welsh Assembly Government endorsed this benchmark on 5th March 2003 and set an aspiration of about 7 TWh of renewable energy production for 2020.

3. Policy Context in Wales

3.2.1 I think that there should be more emphasis on the vital part that renewables has to play in the Governments energy policy and the future low carbon economy. The Energy White Paper endorsed the target of 10% of UK electricity from renewables by 2010 and set an aspirational target of 20% by 2020.

3.2.2 4 TWh per year was not a 'key outcome' but a 'key recommendation' of the EDC Review. As indicated above, this was endorsed by the WAG on 5th March. To meet this benchmark it is important to then explain what 4TWh actually means in terms of the additional renewable capacity required to meet the benchmark and the likely technological mix. This could be based on the Table presented to TAG i.e. additional onshore wind 761 MW, new offshore wind 120 MW (excluding the two permitted sites) and other renewables 50 MW (mainly biomass). This would give an indication of the likely annual deployment rate required to meet the 4TWh benchmark by 2010. In the reference to the Cabinet Response whilst it is stated that 4 TWh is a realistic target for 2010 it is again important to stress that the 4 TWh benchmark was endorsed by the Cabinet and is now the WAG's policy.

- 3.3.1 Might be worth mentioning that at para 12.8.6, Planning Policy Wales states that the planning system will “work towards an agreed target of its electricity and heat requirements from renewable sources by 2010.”
- 3.3.2 I think it is very important to state that TAN 8 will translate the 4 TWh target into various amounts of new installed capacity and technological mix required to deliver the WAG’s commitment to renewable energy.
- 3.3.3 We would concur with the views expressed by Dulas of the difficulties of practically applying the principles of the Wales Spatial Plan to the determination of individual wind energy generation projects.

4. Viable forms of renewable energy

- 4.2.1 The estimate of 545 GWh per annum that onshore wind contributed in 2001 to renewable energy output is incorrect. This figure is derived from the SEL report and it has been acknowledged that the error in Table 3 of that report arose due to the use of DNC (43%) as the base figure for the calculation of output rather than the accepted capacity factor of 30%. The current installed capacity of around 154 MW’s is contributing some 400 GWh per annum of renewable energy output.

Whilst we are pleased with the grant of planning permission for the Cefn Croes project, is there any need to single it out for comment. Other schemes have been permitted in Wales over the last twelve months and these have not been mentioned (e.g. Tir Mostyn and Mynydd Clogau– both on appeal!)

- 4.2.2 The contributions that North Hoyle and Rhyl Flats will make to the 4 TWh target (benchmark!) for 2010 is incorrect. North Hoyle is presently being constructed and will have an installed capacity of 60 MW and whilst Rhyl Flats has development rights to install up to 150 MW, it is our understanding that no more than 90MW will be installed. No doubt NWP will be able to assist.
- 4.5 Need reference here to adoption of 4 TWh benchmark, not just proposal and to the aspiration of the WAG to have 7 TWh of renewable energy electricity production by 2020.

6. Significant external constraints

- 6.2 I think some re-wording is required regarding the 74 km RAF Valley exclusion zone. This is a consultation zone and would be a significant constraint if it was rigorously enforced.

7. Relative significance of siting criteria

- 7.1 On a general point, I am sure you will be well aware of our concerns regarding the use of the proposed GIS based decision support tool to facilitate the development of wind energy in Wales. The approach does have some merit but if the tiered constraints are rigorously applied it is difficult to see how the adopted targets for new wind energy capacity will be met. Detailed comments in this regard have been provided by [redacted] and [redacted] on behalf of the BWEA. We agree with these comments but would like to make some additional points:

Is it possible to find an alternative word for constraints, which implies a negative attitude and sends out the wrong message.

- 7.3.4 Whilst it is generally accepted that wind energy developments should be located outside National Parks and AONB's, we remain opposed to the concept of stipulated buffer zones around such designated areas. Such zones would significantly impact upon the ability to meet the targets for wind energy generation and different locations will have a varying ability to absorb such new development. It would therefore be preferable to refer to the need to consider this issue in the TAN but not to be prescriptive about the distance.
- 7.3.5 With regard to wildlands it is stated that there are no maps defining these areas in Wales and a proportion of such land is already protected as lying within National Parks and AONB's. Such lands are not therefore valid as a geographical constraint and the inclusion of these areas would seriously damage the ability of the WAG to meet the targets.

- 7.6 The Tier 2 environment and planning constraints would seem to be generally acceptable subject to SSSI's remaining only as a Tier 3 Constraint.

9. Proposed decision support tool

As indicated at the TAG meetings it is considered that a criteria based approach to the TAN would best facilitate the development of renewable energy in Wales. Such an approach should be linked to a headline target or benchmark for new renewable generation set out in the TAN and to a suggested technology breakdown as to how this target might be met. It is however likely that the decision support tool will be referred to in the TAN and LPA's will be encouraged to use the tool to identify suitable areas of wind farm development and to consider applications for such development. In these circumstances it is important that the TAN provides a strong steer to LPA's that the significance of effects in any particular tier of potential constraints is balanced against the progress that the Authority or Region has made or is making in meeting its proportion of new renewable energy generation. Over the next seven years, LPA's will have an important duty to develop new renewable energy capacity and in the balancing exercise as we get closer to 2010, the TAN must recognise that the significance of local impacts must be balanced against the overriding need to meet the WAG's targets. The WAG will therefore have an important role to play in monitoring the delivery of the targets by LPA's and a review of progress should be prepared and reported to Ministers on an annual basis.

Additionally it is considered that in order to meet the target, there should be an annual ramped target which takes into account on the ground installed capacity in any one year and permissions granted but not yet built. This would have the effect of adding increasing material weight to the target as we get closer to 2010.

Smith, Joanne (TPE)

From: [REDACTED]@virgin.net]
Sent: 27 May 2003 16:25
To: Simon Power
Cc: [REDACTED] CPRW [REDACTED] Smith, Joanne (TPE);
Morgan, Chris G (TPE)
Subject: Arup interim report - Comments from CPRW



CPRW response to
interim Draft...

Dear All

Attached

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Facilitating Planning for Renewable Energy:

Comments on the interim incomplete draft from CPRW, May 2003

Note: The incomplete final draft of Arup's report was circulated only a day or so before the TAG meeting on 9th May 2003. These notes represent CPRW's response, articulated in general terms at the meeting. It is important to stress that due to the incomplete nature of the Report, it will be necessary to see a final full text before we can make our final, full response. In the meantime, however, we are happy to contribute to the evolution of that version. We have taken the opportunity to make both detailed comments on drafting and layout, as well as more radical suggestions which represent our view of the process (which may of course conflict with other views being put to the Consultants, and is offered to them for consideration). We recognise, of course that this is a report written by Arup, and though some of these points may not necessarily appear in the final report, we think it is helpful for us to make our position clear at this stage.

In the text below, we have adopted the principle of suggesting insertions in red; deletions in ~~blue strikethrough~~; comments in *magenta italics*

EXECUTIVE SUMMARY

Awaited with interest

ACKNOWLEDGEMENTS

Add to CPRW /s _____ ' (!)

page 1

1 Introduction

L1 ... government attention principally as a means of reducing carbon emissions
Significantly, this para refers to 20% production by 2020 and misses out the short-term aspiration for 2010 – which even then likely to be c20% of consumption – an expression of the so-called target used in the English regions and much more understandable in terms of Wales as it demonstrates how we are expected to 'pull more than our weight' in Andrew Davies' phrase. See amended text re 3.2.2, below. It is emphasised at the start that the Arup report concentrates on renewables, which should be firmly set in context as one of several methods of securing a low-carbon economy.

#2 end over 100 turbines of progressively increasing size.

#3 L3 ... windfarms, and their potentially adverse effect on the tourism economy.

L4 ... proposals such as visual amenity, noise and cumulative effects.

L5 ~~emotive~~

#4 L1 The Welsh Assembly Government already

L3 ... potential for and constraints to

page 2

2 Project Brief

#1 L1 has ~~been~~ become

page 4

3 Policy Context in Wales

3.1 #1L3 ... planning policy – including landscape, conservation, recreation and social aspects.

3.2 Energy Policy

There is scant coverage of the wider issues set out in the UK Energy White paper, and the insertions below attempt to remedy this.

3.2.1 #2L1 Replace first sentence with - Energy policy is not devolved to the Welsh Assembly Government, and has come to be administered as a function of Economic Development.

L2 ... produced a UK Energy White Paper

#3 insert at start:

The Energy White Paper emphasises the fundamental importance of using less energy and sets a long term aim of a low carbon economy by 2050. It ~~The Energy White Paper~~ aims for

#3L2 ~~target~~ aspiration

#4L3 ...two-thirds of a recent increase *There may be an award to North Hoyle, too.*

page 5 3.2.2

The EDC extract is significantly misquoted L3... In the longer term ...

***Note:** It is important to remember that the reference to 'a decreasingly smaller part' for onshore wind is qualified by the phrase 'in this'. That means in the 10% aspiration. Therefore, there is recognised to be scope for the three way split by the reducing proportion of on-shore wind during the run-up to 2010. Strictly, one could even argue for a presumption against, even if not quite a guillotine, to apply once the one-third onshore wind had been reached. That is 1.3TWh. We already have 0.7TWh built or consented. Applications already within the planning system (we do not suggest these should necessarily be consented) would bring this almost to 1TWh. We have seven years to go. Unless there is an intention to go much further the onshore wind rush should slow down dramatically, leaving room for offshore and the other technologies. Otherwise the EDC report is meaningless. And if that is that case does it also mean nothing as far as the 4TWh is concerned? We know that WDA and FoE Cymru have advocated 6-7TWh. Our comments below are drafted on the assumption that the 4TWh at least, and preferably the three-way split, will be retained as at least the preferred published option.*

Thus we suggest new text modifying #3 to follow the extract from the EDC Report, leaving the other points arising from the presently episodic #2 to be integrated later:

Welsh renewable energy policy comprises two subsequent statements on behalf of the Welsh Assembly Cabinet by Andrew Davies, Minister for Economic Development: **Energy Statement** ³ 26th February 2003) and the **Cabinet Response to the EDC** ⁴ (5th March 2003). Neither of these statements details the relative contributions of the different forms of renewable energy, except in the broadest terms.

It should nevertheless be noted that the roughly equal three-way split within the 4TWh total was a recommendation of the EDC, which saw onshore wind as decreasing *within* that target period before 2010, thus allowing offshore wind and other technologies to take up their anticipated thirds in the later years of that phase as they became more cost-effective. The EDC saw its recommendations as being based on “a realistic figure on the basis of existing plans”, and though it is not enshrined in policy the whole package has been generally endorsed without qualification by the Minister (³ and ⁴). Built and consented onshore wind represents an output capability of 0.7TWh which is already over half way towards its notional third part of the 4TWh level ⁵. (*Could be validated by a CPRW tabulation*). Further details are provided in section 4.

The Energy Statement acknowledges that in the short to medium term, onshore and offshore wind are respectively likely to be the renewable technologies which contribute most to the Welsh carbon reduction target. In the longer term, the Statement suggests that tidal stream and biomass schemes may play a growing role.

The Cabinet Response offers a more detailed policy view, and ~~although it declines to identify what proportion of renewable energy would be generated by the different technologies.~~ It supports a 20% carbon reduction by 2020 (as opposed to a 20% renewable energy target). Although it describes the 4TWh renewable energy benchmark as “a realistic target”, it states that the 20% by 2020 target would ~~however~~ require around 7TWh of renewable energy to be generated by then. The Cabinet considers that wind energy will initially dominate, although “between 2010 and 2020, tidal stream, PV, biomass, and perhaps wave, are expected to begin to make significant contributions”.

page 6

3.3 Planning Policy

#1 L2 facilitate and control the proposed changes

3.3.2

#1 L6bodies, The Campaign for the Protection of Rural Wales, [!!]

#2 We accept that there will need to be an increasing pace in the development of the renewables sector, but that is no reason for taking the unduly restrictive and artificial view that TAN8 is intended to apply for only approximately 5 years. This is particularly unfortunate as it falls within the 2010 so-called target period and leaves no scope for addressing the wider renewables context that will emerge up to and beyond 2010. It compromises and changes much of the text in the remainder of the report and is a major misconception. Its consequence - one hopes unwitting - is that non-wind renewables are relegated to an undefined future period. This should be avoided by a progressive approach to a 10 year period with an internal revision at or before the 5-year point. Text should now be written setting this general scene and leaving the option open for modifying the detail in the light of developments. This two-stage approach is standard practice, and would allow re-focussing of the TAN as and when necessary.

~~TAN8 is intended to apply in Wales for approximately 5 years as~~ The rapid pace of change in the renewables sector is likely to render the technical detail in TAN8 ~~such a document~~ obsolete relatively quickly. Consequently, there should be an emphasis on the range of technologies considered within this ~~draft~~ revision ~~of TAN8~~ which are realistically expected to experience ~~realistic~~ planning pressure during the first 'target' phase to 2010. ~~in the next five years or so~~ This should be accompanied by a forecast of longer term advice for the following years which could be reviewed after five years or as circumstances required. The more immediately available technologies ~~These~~ are considered by the TAG to ~~consist~~ be currently viable include onshore wind, offshore wind, and a small amount of biomass and hydro. Towards the end of the period, and building up beyond 2010, other technologies using tidal, wave, sun, waste and anaerobic sources will progressively become viable. There has been a great deal of discussion

3.3.3 Wales Spatial Plan

No comment until more detail is known.

page 8

4 Currently Viable forms of renewable energy

4.1 #1 L4 *The reference to 'the lifetime of the forthcoming TAN8' should be read in the light of the comments above.*

4.2 #1 L2 biomass and hydro. *Biomass not mentioned here, hydro missed from 3.3.2!*

4.2.1 Onshore wind

#1 L4 ...recent past an annual average wind speed of 6-7m/s has been recognised as the ~~current~~ threshold

#2 The second sentence in this paragraph, dealing with dimensions, is confusing and factually inaccurate. It needs re-writing and moving to follow the present #5 where it can sensibly be incorporated with a revised version of the present #6.

#2 Retain 1st sentence, delete 2nd, retain last sentence

#3 run-on with first sentence only – stopping paragraph at ‘models’.

More information needed. Start new para with ‘The output...’

Existing L3 ... wind speed, the height of the hub or tower above ground, and the rotor diameter: electricity. Allowing for intermittency of suitable wind speeds and other factors, on-shore turbines typically generate an overall average of 30% of their maximum installed capacity. Annual generation of an installation may be estimated as total installed capacity (IC) x 8760 (total hours in a year) x 30% (typical capacity factor, or CF). In practice output may be expressed in TWh by multiplying the IC in MW by 0.002628. A 30MW installation may thus generate 0.79TWh pa.

#4 L2 Figures are both wrong and out of date

.... so that the distances between them are around 5-10 rotor diameters (~~some 150-500 meters~~). For typical current 30m blades this amounts to 300 – 600m.

#6 Insert new paragraph (from original #2):

Existing onshore turbines in Wales erected over the period 1992-2002 range from a hub height of 25 – 46m plus blades of 16 – 30m giving overall heights of 41-76m and capacities of 300kW to 1.3MW. The largest turbines in Wales at May 2003 are two groups of 3 x 76m @ 1.3MW at Moel Maelogen, Llanrwst, and Blaen Bowi, Newcastle Emlyn. Current proposals and range from 75 – 120m overall with capacities of 750kW to 2MW.

Old #6 = new #7:

Delete 2nd sentence and reference 6, which are out of date.

L3 Since 1992, 365 ~~over 360~~ turbines have been built in 19 installations, with a total installed capacity of 170MW and a generation capability of 0.45 TWh pa. Planning consents for four others (including Cefn Croes) represent a further 72 turbines and bring the total capability to almost 0.7TWh pa ⁷.

Delete remainder of paragraph

Amended ref⁷:

CPRW (May 2003) Position Statement. Available and updated at cprw.org.uk/

page 9

The geographical distribution of onshore wind turbines ~~windfarms~~ in Wales is as follows ⁷ [not ref 8 – same ref as before]

[Table extended and updated from source:]

Planning Authority	No. of onshore installations	Number of turbines	Installed Capacity (MW)	Generation capability (TWh)
Anglesey	3	72	33.2	
Carmarthenshire	3	19	13.0	
Conwy	3	6	6.2	
Ceredigion	3	47	18.6	
Powys (Montgomeryshire)	5	179	80.45	
Powys (Radnorshire)	1	22	9.9	
Rhondda Cynon Taff	1	20	9.0	
Totals	19	365	170.35	0.448

Last#

This gives a very odd account of how Public Inquiries come about!

L3 *The overwhelming proportion of local responses is against turbines, with very few expressions of support (other than by those with a financial interest!). Moreover most objections are to the specific siting and visual effects of the turbines not to the technology. Best to cut out the misleading reference, below.*

.... other stakeholders. ~~both in favour of the technology and against it.~~ The best windy sites which attract developers tend to be those where visual effects are significantly adverse, leading to policy conflicts and rejection by LPAs, who conclude that despite the perceived need to exploit renewable energy sources, the benefits are not locally outweighed by the impacts. Developers are increasingly appealing such decisions leading to ~~lengthy~~ Public Inquiries and associated expense by all parties.

page 10

4.2.2 Offshore wind

#1 The major difference is that the technology is at an earlier stage of development: costs have not yet reached financial equilibrium and specific financial support is still required (though forthcoming). Turbines tend to be larger – from 2MW up to 3.6MW and 120 – 135m, with a model under development

#3 L5 development of 100MW ~~150MW is proposed~~ is underway. (*My information is 100MW, but perhaps Arups know something new?*)

#4 L1~~90MW~~ 108MW

#5 Start with new text:

Offshore turbines, which enjoy a steadier and more frequent wind regime are recognised as having a 40% Capacity Factor which equates to multiplier of 0.003504, on the basis explained for onshore turbines (above). Taken together, these three projects ~~windfarms~~ could already make a significant contribution to the 4TWh target by 2010 of over 1TWh, or almost the one-third anticipated by the EDC.

4.2.3 Hydro

No comments, but see STC para 125 which cites a more buoyant view of prospects.

page 11

4.3 Potentially viable technologies ~~during the TAN8 period~~ in the short to mid term

We are in a volatile and fast-developing area with 7 years to go before 2010. Seven years back, in 1996, even onshore wind was in its infancy and still heavily subsidised, while offshore wind was considered way beyond the horizon. The heading and concept should be made more flexible in view of the concerns expressed earlier that an inflexible and unjustified straitjacket is being applied which will limit discussion to the five year period and focus decisions around wind power at the expense of other technologies.

*We would recommend Arup and other stakeholders to study the House of Common Science & Technology Committee's (STC) recent fourth report of session 2002-3 of March 2003 entitled '**Towards a Non-Carbon Economy: Research, Development and Demonstration**' for a critical, informed and up-to date appraisal of the various available technologies and methods of securing this objective. The Committee notes (inter alia) that the Renewables Obligation creates incentives only for technologies that are close to market, while concluding that the focus should be on offshore technologies – wind, wave and tidal (Summary). Paras 125-162 of the report deal with individual technologies and could be studied by the authors with benefit.*

Biomass

A large ?20-40MW? plant is being established at Winkleigh in mid Devon. See recent DTI announcements.

page 14

Tidal barrage or lagoon

In view of the market optimism by Tidal Electric it seems unrealistic not to develop some specific planning advice for this technology, especially given the flexibility needed around the 2010 period. See STC paras 134-8 for a bullish assessment of near future prospects.

4.4 Minor and long-term renewable technologies

page 15

4.4.4

Energy from waste

A £7.7m 2.1MW anaerobic digestion CHP plant opened at Holsworthy in Devon in July 2002 jointly financed by local farmers and Farmatic Bitoech Energy UK Ltd. It contributes 1.8MW to the national grid and hot water for public buildings. This technology is at a more advanced stage than indicated and the text should be moved into the previous section.

4.4.5 Tidal stream

No mention (very surprisingly) of the initiative in collaboration with the Pembrokeshire Coast National Park Authority in the waters of Milford Haven, or of a similar project at Lynmouth off the Exmoor National Park. In view of this and other developments (eg in the Solent) it seems unrealistic not to develop some specific planning advice for this technology, especially given the flexibility needed around the 2010 period. This text should be expanded to cover these projects and prospects, and should therefore be moved bodily into the previous section 4.3.

In general it is unfortunate that representatives of the non-wind technologies seem to have withered away from the increasingly wind-centric meetings of the group. Had this not happened it is likely that their technologies would have had a fairer crack of the whip. This group has become very much developer-led, but notably this does not reflect the complete spectrum of energy sources, doubtless due to the artificially short time-horizons adopted.

page 16

4.5 Conclusions

#1 L2 production, or almost 20% of consumption.

L3 ... as well as ~~future developments~~ developing technologies.

L8 Although the consenting process will have to consider both energy considerations and environmental impacts, the application process is therefore expected to be developer-led,

#2 L1no ~~suggestion~~ indication of how ~~that~~ this

L3 an essentially ~~reactionary~~ [!!!] reactive process

#3 a) L1-2 are currently or may be expected to become commercially attractive / viable within ~~the next 5 years~~ or soon after the 2010 target period

page 17

In view of the remarks made above about the artificially short time frame of 5 years, and the dubious basis on which some of the other technologies are relegated to the longer term, we are not convinced by the arguments to confine the planning tool (/ facilitating mechanism) to wind power

Table 4.x

Accordingly, there are defects in the Table, which is otherwise a useful device.

The combined heading *Realistic Planning Pressure* should be amended to read ... 'during the TAN8 period' ***[which itself should not be confined to the next 5 years and should be elasticated as described earlier]***. Similarly the phrase ~~within the next 5 yrs~~ should be deleted from each of the two sub-column headings.

The assessments in some of the boxes should be changed as follows (the rest are broadly agreed):

Technology	Heat or Electricity	Realistic planning pressure within the TAN8 period		Significant contribution to the 4TWh target	Spatial planning tool required?	
		Technically feasible	Financially viable		Land use planning	Locational choice
Onshore wind						
Offshore wind					Y	
Biomass - woodfuel			Y?		Y	Y
Biomass – aerobic dig		?	?	N		
Hydro						
Tidal barrage		Y?	?	?		
Tidal stream		Y?	Y?	?		
Tidal lagoon		Y?	Y?	Y?	Y	Y
Wave			Y?			
Solar PV			?			
Solar passive						
Waste						
Landfill gas						

The second Table can readily be augmented to show TWhpa under different scenarios as follows in the version preferred by CPRW et al which conforms to the EDC three way split: [the Dulas figures are included in brackets]

(some more data needed for minor technologies)

(Note that categories have been changed to fit with Table 1)

We feel that there should be this context before the report looks at scenarios, since at present there seems to be a runaway and unjustified momentum for far more onshore wind than is needed to meet the target in a period that, importantly, has still another 7 years to go. The danger exists that stakeholders will be stampeded and frightened into agreeing too lax a set of criteria when in fact they can be more relaxed about it, even accepting the 'target' for 2010 which now we know is of course only an 'aspiration' anyway.

Technology	TWh pa (existing and consented)	New schemes			TWh pa target totals assuming three way split	
		% contribution	MW IC	TWh pa	needed	target
Onshore wind	0.693	Proposals = 0.7TWh incl Camddwr			0.637	1.33
Offshore wind	0.665	Scar = 0.378 TWh			0.665	1.33
Biomass woodfuel	-				1.03	1.33
Biomass aerobic digestion	—					
Hydro	0.3 * [est]					
Tidal barrage						
Tidal stream						
Tidal lagoon						
Wave						
Solar PV						
Solar passive						
Waste						
Landfill gas						
TOTALS	1.65 est				2.35	4.00

5 ~~Siting Criteria for viable renewable technologies~~

On-shore wind turbine installations

This heading is misleading and quite wrong. Virtually all the text which follows in chapters 5, 6, 7, 8 and 9 is devoted to wind power, and the heading thus perpetuates the idea that this is the only technology that is viable and needs guidance during the TAN8 period, whether 5-years, 2010, or 10 years. It will lead to scant attention being paid to opportunities for other technologies – a matter of increasing importance as time goes on. It is also mistaken to mix on-shore and off-shore wind, as though there are some aspects in common to both, it would be more helpful to have text separated.

We suggest that 5-8 should be combined into one chapter in respect of on-shore wind alone, following the present structure, thus:

- 5.1 Siting criteria (was Ch 5)
- 5.2 Significant external constraints (was Ch 6)
- 5.3 Relative significance of siting criteria (was Ch 7)
- 5.4 Review of planning approaches (was Ch 8)
- 5.5 Proposed decision support tool (was Ch 9)

The same structure should then be used for Offshore Wind resulting in Ch 6 sections 6.1-6

Other technologies should then be discussed briefly and progressively in a new Chapter 7 where some very broad indications should be provided for each, obviously in less detail. We feel strongly that this initial step should be taken, so that as the choice of technologies broadens, some comparative context is available for decision makers to face strategic questions and to look at options rather than non-options for the future as the characteristics of their areas might determine.

Turning to the text as written we have the following comments:

page 20

#2

We welcome the acknowledgment in the review of the Macaulay work that there is a danger if artificially isolating areas with 'no constraints' and concluding from that there would be no obstacles to proposals receiving planning consent.

Table 5.1

Wind speed at hub height As turbines become larger and taller, areas with economic wind speeds at greater heights become viable, leading to a movement of the largest turbines into areas previously thought inapplicable. This has a complex range of major spatial and planning implications.

page 21

Environmental > Visual Impact > Proximity to public access areas.

We appreciate the reason why visibility is mentioned in brackets and a question mark! Direct intervisibility between turbine installations is merely one facet of cumulative impact, the others being simultaneous and sequential impacts, as mentioned in 7.3.2. It should therefore be possible to delete the word (~~visible?~~) at this level of tabulation.

Social > Amenity > Proximity to public access areas and routes

(in this category as well as the above)

Proximity to houses and settlements

Effect on tourism

6 Significant external constraints

No comments

7 Relative significance of siting criteria

page 28

7.1 Introduction

The approach should be sequential following the model proposed by the Countryside Agency in England, where there should be a presumption against proposals in the higher tiers when there were still sites available in the lowest or lower tiers.

page 29

L6 into or close to these areas.

(buffers are mentioned in the next paragraph in relation to AONBs)

page 30

7.2.4 Landscape Quality / Capacity

Add at end of #1

Steps should be taken to establish a consistent and comprehensive coverage of SLA designation throughout Wales, and a suitable buffer defined following the precedent of National Parks and AONBs.

7.3.1

A buffer is required, both on-shore and offshore, otherwise these designations are linear and meaningless in this context.

page 31

Table 7.x

We appreciate both the attempt made in this Table and the difficulties involved. The division point at 75/76m is unfortunate since there are common specifications at both these heights. It would be better to show buffers on a graph matrix so as to indicate some sort of general sliding scale. This would allow more flexibility. The Choice of the upper numerical zone is similarly rather arbitrary, and surprising that 120 turbines should imply the same buffer as 4 turbines. Why is there an upper limit at all?

page 32

7.3.3

Generally valid comments can be made about capacity irrespective of landscape quality. That is best fed in on a case-by-case basis.

7.3.4 National Park buffers

It is important to convey that views into as well as views out of such areas are important. The former perhaps more so. Buffers should also reflect the size and numeric criteria as in Table 7.x.

7.3.5

Wild lands (so-called)

Cannot LANDMAP provide an adequate surrogate? In any case the final judgement will be made at a case-by-case level (as in all matters) and no guidance can be a substitute for that.

page 35

7.4.1 Receptors e.g. National Trails

we welcome the suggested buffer, but suggest this inevitably leads on to other smaller linear buffers for other promoted or defined routes. Routes usable by horses should be carefully protected.

page 36

We await the promised text

pp 37-8 Table 7.2

Needs tidying up to reflect changes in the text, notably in referring to buffers.

8 Review of planning approaches

page 41 8.1 #1 L1

We are unhappy about reference to viability, but accept the implied need to encompass several technologies preferably on some sort of sliding scale.

General comment – The criteria-based approach should lead to some form of map definitions.

9 and 10 and Appendices

We prefer to reserve our position until we have seen the final text

Smith, Joanne (TPE)

From: [redacted]@wwf.org.uk
Sent: 23 May 2003 16:17
To: simon-j.power@arup.com
Cc: Smith, Joanne (TPE)
Subject: WWF Cymru comments on Draft Report



commentsArupdraft.do

c

Dear Simon

Enclosed my main comments on the Report.

What puzzles me is it's status: it is still a draft and will only be finalised after the draft TAN is issued? That will presumably be drafted without everyone's comments taken on board?

Good luck with the torrent of responses!



Swyddog Polisi WWF Cymru Policy Officer
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Comments on draft report from Arup on 'Facilitating Planning for Renewable Energy' from WWF Cymru 23.05.03

Policy context in Wales

See also 3.2.1 para 2

3.2.2 Energy Policy in Wales

Unlike Scotland and Northern Ireland, energy is not a devolved function in Wales. However, energy is a vital area for the economic prosperity of Wales and the Welsh Assembly aims to establish Wales as a global showcase for clean energy developments. Key drivers such as the legislation to promote sustainable development and climate change imperatives mean that Wales can use its present powers via secondary legislation through the Welsh Assembly to pursue a more sustainable path for energy production and use. It can also press for powers for future responsibility over its energy matters, as the Minister for Economic Development has indicated in his statement on the EDC Report on RE to Plenary on 5 March.

Para 4 It should be noted that the EDC recommendation has not been endorsed by the Assembly. The benchmark nor the 3-way split have not been debated in the Assembly Plenary. Discussions over disaggregations of the benchmark, based on sub-regions, with flexibility of mix should be allowed.

Line 4 should read **Cabinet response to the EDC**

3.3.3 Wales Spatial Plan

I have been (reliably) informed that the WSP will remain part of Sue Essex's remit. It was due to be revisited this summer but with the Cabinet rearrangements this needs to be investigated.

4.3 Potentially viable technologies during TAN 8 period

This, at the setting up of the TAG two years ago, was *in the next 5 years*. Do we need to remind ourselves and clarify the period of the duration of the TAN (from 2003 to 2008?) which brings us really close to the 2010 target. Should there be more flexibility to allow new technologies to come online?

4.3.2 Tidal barrage or lagoon

para 3 delete in line 3 *and is supported by current WAG policy...* and insert the following:

and the EDC Minister referred to it in his Cabinet response to the EDC (5.03.03) where he states:

"In the longer term, special projects such as the Severn barrage may have tremendous potential. Barrages have environmental and economic implications and we see value in further studies. I will continue to press the importance of this on the Minister of State for Energy and Construction."

It should be noted that this is a Cabinet comment only and neither the EDC nor the Assembly have discussed this in any detail.

Insert before '*At least one...*

Tidal lagoons offer an alternative option to barrages for containing tidal waters and extracting energy. However, lagoons will also result in some adverse effects on the marine environment, and will require building aggregates. Careful consideration of such developments will be needed. For instance, where they are to be placed in relation to disturbance to marine habitats and species, disturbance to physiological features such as the sea bed and tidal currents that may affect erosion of the shore would need to be considered through a detailed EIA study.

4.4.5 **Tidal stream** and 4.4.6 **Wave**

Further details of the potential of marine renewable sources in Wales can be found in the report '*Turning the Tide: power from the sea and protection for nature*' (WWF and The Wildlife Trusts' Joint Marine Programme) December 2002.

Chapter 5 It should be made apparent that this deals mainly with on and offshore wind.

6.3 **Wind speed models**

This was considered at the meeting to be an 'advisory' variable rather than a constraint.

6.4 para 4 It was noted at the meeting that the existence of cabling does not guarantee capacity. However, it was also noted that Ofgem and other bodies were increasingly realising the relevance of 'embedded' or distributed generation in supplying renewable electricity, especially in Wales.

7.1 Tiers 1, 2, 3

Tier 2 constraints are a mix of nature conservation designations and landscape (visual) ones. Future biodiversity regulations and potential further constraints will make a mapping process necessary, rather than a criteria-based approach. A strict sequential approach is deemed necessary to ensure that appropriate development occurs, subject to the necessary EIAs and SEA limitations on cumulative and synergistic impacts.

8.2 **Land Use Planning System**

para 3 Offshore situation is very complicated (see Turning the Tide Report referred to earlier)

8.3 A Spatial approach is preferable to criteria -based one as any mapping tool would refer to the Tier level in terms of the particular policy context. Areas of search give more flexibility than allocations.

9.1 It is not clear if the proposed decision tool is to be useful for both planners and developers.

10.2 Recommendations

Many issues are left unresolved and there is no clear steer.

It is unclear which approach should be adopted, nor why. A spatial versus criterion-based analysis would be useful to inform that decision.

There is also insufficient emphasis on the impact of RE in buildings (BIPV, solar thermal and so on) as well as demand side management.

Smith, Joanne (TPE)

From: mike.webb@rspb.org.uk
Sent: 23 May 2003 17:44
To: Smith, Joanne (TPE)
Subject: RSPB's representation in respect of Arup report on decision-tool



First rep to TAN8
Planning Too...



Model Policies
2001.doc


2001.doc>>

<<First rep to TAN8 Planning Tool May 03.doc>> <<Model Policies

Dear Joanne

Please find attached our response to the report, together with an attachment containing model development plan policies. I would be grateful if you could pass these on to Chris, and to Simon Power

Yours sincerely


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Mr Chris Morgan
National Assembly for Wales
Cathays Park
Cardiff
CF10 3NQ

22nd May 2003

Dear Sir

"FACILITATING RENEWABLE ENERGY GENERATION" DOCUMENT

I would like to supply you with the following representation in respect of the above document

Background : RSPB Cymru welcomes the broad approach pursued by the TAN, in developing a decision-tool for the location of renewable energy projects in Wales. We are of the view that this will help to deliver certainty as to the preferred locations of such developments, and thereby speed up and simplify the planning process *vis a vis* renewable energy development.

Introduction : I would like to make the following general points with regard to the broad approach to the decision-tool :-

1. The decision-tool, and indeed the TAN itself should be viewed as one element in a wider planning strategy to combat and ameliorate global climate change and pursue a sustainable landuse pattern. Other tools will include energy conservation, transport planning, density and location of development, design and demand management. Planning strategy should itself be seen as one of a number of policy levers at the disposal of the National Assembly for Wales in the field of energy policy.

1.1 RSPB Cymru is of the view that the NAW objective of combating global climate change should be expressed in terms of carbon dioxide reduction rather than energy generation alone. This would enable all of the above public policy levers to be brought to bear on global climate change, and would also have the advantage that local planning authorities could contribute to this reduction through both facilitating renewable energy generation and through all of the other methods of promoting a sustainable landuse pattern referred to above. It is important to bear in mind that carbon dioxide emissions arising from energy generation account for only approximately 20% of all such emissions

2. The fundamental purpose of the town and country planning system in Wales is to intervene in the market in order to guide development in the public interest. There will be instances where this will mean that the most profitable locations for renewable energy developments will not be acceptable in the wider public interest.

I would like to make the following specific points:-

1. The Time-Frame For Which The TAN And Thereby The Decision-Tool Will Apply : RSPB Cymru is strongly of the view that the appropriate time-frame is 10 years, rather than the stated 5 year time-frame as set out in the document. As the time-frame for achieving the benchmark of 4 TWh is 10 years, it is logical that WAG guidance as to how the planning process will contribute to this should also be 10 years. As the pace of technological innovation accelerates, the choice of technologies available to attain the benchmark will broaden, as new technologies come on stream. By constraining the TAN to a 5 year time-frame, the document effectively precludes flexibility between technologies, and thereby unnecessarily promotes those more immediately available at the expense of other, possibly less environmentally damaging technologies. Whilst it may be argued that the TAN can be reviewed, other TANs have not been reviewed for many years (e.g. TAN 5 - 1996). In any event, in the first 5 years of the TAN, an unnecessary momentum would be built up in favour of certain technologies, and there may well be instances where inappropriate developments are permitted.

2. The Proportion Of Technologies To Make Up The Benchmark : We consider the equal one-third split between onshore wind, offshore wind and all other technologies to be somewhat simplistic. We are concerned that the table on p18 of the document assigns a substantial energy generation to Biomass/CHP. We request clarification as to whether this refers to small roundwood, forest waste, sawmill offcuts, or to short rotation coppice. The latter source may have significant adverse impacts on the environment of Wales, in the sense that it would create a market for a crop which would in all probability be cultivated on unimproved upland wet grassland, a scarce and declining habitat of acknowledged importance which may not have any protective designation conferred upon it.

2.1. RSPB Cymru is strongly of the view that every effort should be made to promote marine technologies, as we are firmly of the view that many of these (especially wave and tidal stream) will have negligible environmental (and landscape) impacts. We are also of the view that active solar and PV technologies will gain increasing importance by or before 2010

3. Disaggregation of the Benchmark: RSPB Cymru is in favour of the disaggregation of the benchmark by sub-regions, possibly along the lines of Regional Planning Guidance groups. A strict adherence to disaggregation by local planning authority would introduce an unacceptable degree of inflexibility, and result in a disproportionate burden on local planning authorities with small surface areas. On the other hand one benchmark for the whole of Wales would result in pressure from several local planning authorities to resist all renewable energy generation developments. Use of sub-regions therefore provides a sensible and workable compromise.

4. The Mandatory Nature of Disaggregated Benchmarks: The process by which individual benchmarks are produced should be analogous to the manner in which housing figures are generated for individual local planning authorities. This will be a combination of the Wales-wide spatial approach as set out in the document, and the flexibility for groupings of local planning authorities to designate areas of search consisting in the main of lowest tier land (see detailed comment on the document). This will ensure that decisions relating to the contentious issue of the disaggregated benchmarks are taken at the strategic level, and detailed locational decisions are taken at the sub-regional level.

5. Criteria Based vs Spatial Planning: RSPB Cymru's preferred option is the spatial approach. In our view a criteria-only based approach cannot deliver the certainty which the National Assembly for Wales, the community and the local planning authorities require, for the following reasons :-

5.1. A criteria-based approach must still make spatial statements, relating to nature conservation designations for example. Without mapping these, the process cannot deliver certainty as to which areas will be acceptable. Whilst it is accepted that there will be other constraints over and above those which would be mapped in the spatial approach, such as possible landowner unwillingness to release land for development for example, early versions of a broad-based spatial approach indicated that the 4TWh benchmark could be achieved utilising solely the lowest tier. Similar approaches in Scotland have also indicated this to be the case.

5.2 A spatial approach would be likely to be more acceptable to elected Members, because it enables contentious decisions to be taken at a strategic level, allowing local flexibility in decision-making, without undermining the broad thrust of the attainment of the benchmark. It will build transparency into the process, and thereby enable an appreciation on the part of the community as to the mechanisms by which it is intended to guide such development on a Wales-wide scale

5.3 Without a spatial approach it would be impossible to adopt a sequential approach (see below)

6. A Sequential Approach : RSPB Cymru is of the view that a strongly approach should be built into the decision tool i.e. that on a sub-regional basis, all appropriate land in the lowest tier should be developed before any land in the next tier (provided that issues of cumulative impact are dealt with adequately)

7. I enclose detailed comments on the document

If you require any further information or detail in relation to this representation, please do not hesitate to contact me

Yours faithfully


Conservation Officer, Planning

DECISION TOOL – "FACILITATING PLANNING FOR RENEWABLE ENERGY"

REPRESENTATION BY RSPB CYMRU

DETAILED COMMENTS

1. Introduction : The introduction restricts itself to referring to the landscapes of Wales. It should also note that Wales is a country of internationally and nationally important nature conservation sites and species.

Paragraph 5 : The decision tool is of equal importance to developers as well as the NAW and local planning authorities. If it is not used by the former, much of the resultant speeding up and simplifying of the planning system in relation to renewables will not materialise

Paragraph 5 : It is important to state at the outset that the decision-tool is aimed at the strategic element of the planning system. Normal development control processes will still apply

2. Project Brief : This should refer to the considerable environmental policy context for renewable energy generation, rather than restricting itself to economic and planning policy. Ultimately the impetus for renewable energy generation, and indeed the general thrust of energy policy in Wales in general, is the combating of a global environmental phenomenon

Aim: The aim should be strengthened by deleting "assist" in line 2, and inserting "ensure that".

3.2.1. The statement that the Energy White Paper aims for a 20% CO₂ emission reduction by 2020 is incorrect - the actual target date is 2010, from a 1990 base date. The Minister has also set a CO₂ emission reduction target for Wales of 20% - but by 2020 from a 2000 base date.

3.3.2 Wales Spatial Plan : Factual correction : The WSP will incorporate more than planning policy. Its stated intention is to address issues beyond this, including agriculture, forestry and the marine environment for example

3.3 Et seq: This section should be re-written in the light of RSPB's recommendation that the timescale of the TAN should be increased to 10 years. A number of technologies referred to in the document as being not viable may well then become so during the new timeframe.

4.3.1 : RSPB Cymru is concerned about this technology. Please see reference to this in the main body of this representation.

4.3.2 To state that the Severn Barrage is "supported by WAG" is not correct, and should be deleted. The Minister, in his 5 March statement, stated that the Barrage had 'considerable potential for Wales' and that the importance of such a project would continue to be impressed upon the UK Government, but this should not be presented as a policy endorsement. The UK Energy White Paper recognises the scope for 'significant' carbon reductions from tidal barrage schemes after 2020, but also recognises 'strong environmental concerns.'

4.4 To describe a number of the technologies under this heading as "minor and long-term" technologies is to seriously underplay them (see reference to RSPB Cymru's preferred timescale). Marine technologies and PV offer more certainty than implied by the document, which states that they "may (emphasis added) become significant in the longer term". No reference to the potential for PV power stations is made, and the document restricts itself to domestic PV

4.4.5 Marine Current Technology : It is the view of RSPB Cymru that the document somewhat underplays this technology. We view this as being a technology which has minimal environmental (or indeed landscape) implications, and one which we feel all effort should be devoted to its development. A built and operating prototype for this already exists in Wales, in Pembrokeshire. Table 4.x on page 17 should be adjusted to take into account this comment. The unnumbered table reference to Dulas should also be amended in this manner. For example, we are concerned at the high generation levels attributed to Biomass CHP (see main body of representation)

4.4.6 : As 4.4.5 above

4.5 We can see no justification for the statement that attaining the 4TWh benchmark will be "developer-led". As stated in the introduction to the main body of the representation, the aim of the planning system is to intervene in the market in the public interest. Renewable energy policy requires a partnership approach between government, statutory and non-statutory sectors and the private sector, particularly as substantial amounts of public money is invested in facilitating appropriate renewable energy projects. This sentence should therefore be deleted

4.5 a) Delete "5" . Insert "10" ; See above

5.3.1 This should read "Relevance to Planners and to Developers"

Table 5.1 : Cumulative impacts have not been addressed here. As a general point, it is assumed throughout the document that cumulative impacts apply only to landscape issue. This is emphatically not the case. Cumulative impacts on birds is a real issue, especially, but not exclusively, in the marine environment.

Sub-heading "Environmental" in Table 5.1. The following new categorised should be referred to :-

1. Non-Designated Sites of Acknowledged Importance For Birds : Many sites throughout Wales are nationally important for certain bird species of acknowledged importance. This might include the Key Area concept, which RSPB Cymru is on the process of mapping

2. Important Concentrations of Breeding or Wintering Bird Species of Acknowledged Importance. Some of the most damaging development proposals for renewable energy projects would have had significant adverse impacts on such important species as black grouse and hen harrier. These are not restricted to designated sites or even to Key Areas.

3. Habitats Of Acknowledged Importance : This would include UKBAP priority habitats. These are not designations of individual sites, but important habitat types

There is no reference to the potential adverse impact of the disruption of hydrology on wetland site due to the construction of roads, tracks and cable trenches. This is a potentially very serious impact, and one which may manifest itself over far larger areas than the physical footprint of the development

Table 5.2 : The following new categories should be referred to :-

1. Visual Disturbance/Avoidance of developments by birds, resulting in loss of food sources

2. Collision-risk with important concentrations of storm-driven seabirds

6.3 It is not correct to state that 7 m/second is the minimum operational wind speed for turbines. The figure is based on a perceived economic minimum speed. This is changing with changes in grants, exchange rates and changes in technology for example, and should therefore be deleted, as reference to it may result in the perception that substantial areas of Wales which could be the location of wind energy generation projects have windspeeds which are too low

7 Relative Significance of Siting Criteria : I am somewhat unsure as to whether this is the correct juncture for detailed comments on the precise wording of the policy. I will submit these in detail in due course, however, I present the following points as a general aid to policy formulation :-

7.1 There is insufficient distinction between the wording of Tiers 2 and 3. I suggest that standard wordings drawn from the accepted hierarchy in nature conservation policies in development plans should be the starting point for this work. I enclose a copy of model policies drawn from the RTPI document "Planning for Biodiversity" 1999 to assist in this process

7.2 Delete "unacceptable" from Tier 2 : This introduces a subjective element in the policy. We are of the view that an assessment of impacts on nature conservation resources should be objective

Tier 3 land includes land nationally important for nature conservation, therefore reference to "sub-national" designations should be deleted. The new categories referred to in the comment on Table 5.1 should be included in Tier 3

A new tier ("Tier 4") should be created, within which there would be a presumption in favour of wind energy developments, provided all other relevant policies are satisfied.

In general there may be a need to revisit the location of the various nature conservation designations within the Tiers

7.6.1 Delete reference to the unlikelihood of the wish to locate wind energy developments in a Ramsar site. Adverse impacts can arise from developments at some distance from in the vicinity of Ramsar sites, on firmer ground. Projects which would have a significant adverse impact on the Dee Ramsar site for example have in the past been mooted

7.6.3 Reference to potential SPA's in a manner analogous to candidate SAC's should be made

Factual correction : Marine SPA's do not have to SSSI's. Indeed they cannot be as SSSI's cannot be designated in the marine environment

7.6.4 The distinction between NNRs and SSSI's is a false one. SSSI's also have to be managed for their cited nature conservation interest

Chapter 8 should have clearer focus, in the sense that it should examine the merits of a criteria based versus a spatial planning approach, and state clearly which approach it recommends to WAG.

Chapter 9 : It should be clearly stated that the decision-tool will be a material consideration in the planning process

Table 9.1 : Please see RSPB Cymru comments on Table 5.1

9.4 : There should be a section on how developers will use the planning tool. See comment in main body of representation

10.2 Bullet Point 4 : RSPB Cymru strongly supports this concept, in that it enables local planning authorities to contribute to combating global climate change through a combination of both approaches. An authority such as Cardiff for example, would probably have a limited ability to attain the benchmark through energy generation alone, but would have the greatest potential in Wales to combat global climate change through sustainable urban planning techniques such as those set out in the main body of this representation

INTERNATIONAL SITES

Developments not directly connected with or necessary to the management of a European Site, a proposed European Site or a Ramsar Site which are likely to have significant effects on the site (either individually or in combination with other plans or projects) will be subject to the most rigorous examination. When such developments would affect the integrity of the site they will not be permitted unless:-

- i) There is no alternative solution ; and
- ii) there are imperative reasons of over-riding public interest for the development or land use change.

Where the site concerned hosts a priority natural habitat type and/or a priority species, development or land use change will not be permitted unless it is necessary for imperative reasons of human health or public safety or for benefits of primary importance for the environment.

Where development is permitted the authority will consider the use of conditions or planning obligations to ensure the protection and enhancement of the site's nature conservation interest"

"NATIONAL SITE SAFEGUARD

Developments in or likely to affect Sites of Special Scientific Interest, or Marine Nature Reserves or proposed MNR's will be subject to special scrutiny. Where such developments may have an adverse effect on the SSSI or MNR it will not be permitted unless the reasons for the development clearly outweigh the nature conservation value of the site itself and the national policy to safeguard the national network of such sites.

Where development is permitted the authority will consider the use of conditions or planning obligations to ensure the protection and enhancement of the site's nature conservation interest."

LOCALLY DESIGNATED SITES

Developments likely to have an adverse effect on a Local Nature Reserve, Wildlife Site or a Regionally Important Geological/Geomorphological Site will not be permitted unless it can be clearly demonstrated that there are reasons for the proposal which clearly outweigh the need to safeguard the substantive nature conservation value of the site or feature

Where development is permitted which would damage the nature conservation value of the site or feature, such damage will be kept to a minimum. Where appropriate, the authority will consider the use of conditions and/or planning obligations to provide appropriate compensatory measures"

"REGULATION 37 FEATURES

Development which may adversely affect the integrity or continuity of the landscape feature listed below (which are of major importance for wild fauna and flora) will only be permitted if it can be shown that the reasons for the development clearly outweigh the need to retain the features and that mitigating measures can be provided for, which

are within the control of the developer, which would reinstate the integrity or continuity of the features

Appropriate management of these features will be encouraged generally and particularly by the imposition of conditions on planning permissions, by the use of planning agreements and by entering management agreements with landowners and developers where appropriate”

List of Features

etc

SEMI-NATURAL HABITATS

POLICY

“Development which materially adversely affects semi-natural habitats such as moorland, woodland, sand dunes, marshes, unimproved grassland, streams, ponds and riverbanks and will not be permitted unless it can be shown that the reasons for the development clearly outweigh the need to retain the features and that mitigating measures can be provided for, which are within the control of the developer, which would reinstate the integrity or continuity of the habitats”

SPECIES PROTECTION

“Development which would have a material, adverse effect on species and their habitats of acknowledged importance will not be permitted unless appropriate measures are taken to secure their protection and continued vitality”

POLLUTION

“Development will not be permitted where it would have an adverse impact on environmental quality in terms of:

1. The quality, quantity and natural flow of surface, underground and the quality of sea water;
2. Emission of airborne pollutants;
3. Vibration, odour, light or noise pollution, and
4. The quality of soils”

COMMON LAND

“The Council will encourage the protection and sustainable management of common land, and will oppose any development which would detrimentally affect its open character and ecological value. The Council will resist proposals to de-register common land”