

Infrastructure 10, Bat Conservation Trust

Senedd Cymru | Welsh Parliament

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith | Climate Change, Environment, and Infrastructure Committee

Bil Seilwaith (Cymru) | Infrastructure (Wales) Bill

Ymateb gan Ymddiriedolaeth Cadwraeth Ystlumod | Evidence from Bat Conservation Trust

General principles

What are your views on the general principles of the Bill, and is there a need for legislation to deliver the stated policy intention?

The general principles of the Bill seem logical and definitely require legislation in order to deliver them, due to the way that the current system is laid out. We hope that, through the principles of the Bill, development impacts on the environment will be considered robustly and more effectively, including through more thorough consideration of cumulative impacts across multiple projects/sites. Streamlining of the consenting process cannot be at the cost of reduced environmental assessment or less robust environmental protections.

What are your views on the Bill's provisions (set out according to parts below), in particular are they workable and will they deliver the stated policy intention?

Part 1 - Significant infrastructure projects

No response.

Part 2 - Requirement for infrastructure consent

No response.

Part 3 - Applying for infrastructure consent

No response.

Part 4 - Examining applications

No response.

Part 5 - Deciding applications for infrastructure consent

No response.

Part 6 - Infrastructure consent orders

No response.

Part 7 - Enforcement

Legislation regarding enforcement can be quite robust but the actual implementation is a major factor in determining the effectiveness of enforcement. Therefore, we believe that it might be too early to predict how well the enforcement will work in practice.

Part 8 - Supplementary functions

No response.

Part 9 - General provisions

No response.

What are the potential barriers to the implementation of the Bill's provisions and how does the Bill take account of them?

No response.

How appropriate are the powers in the Bill for Welsh Ministers to make subordinate legislation (as set out in Chapter 5 of Part 1 of the Explanatory Memorandum)?

No response.

Are any unintended consequences likely to arise from the Bill?

No response.

What are your views on the Welsh Government's assessment of the financial implications of the Bill as set out in Part 2 of the Explanatory Memorandum?

No response.

Are there any other issues that you would like to raise about the Bill and the accompanying Explanatory Memorandum or any related matters?

We believe that more could and should be done to ensure all significant infrastructure projects, particularly large-scale renewable energy developments,

undertake proportionate measures to minimise on adverse impacts on bat species.

For instance, if not planned carefully, wind turbine farms can cause direct collisions, barotrauma injuries and other adverse impacts on bat species. Different operating techniques and sensitive site placement can be used to reduce the adverse impacts on bats and could be required through the consenting process.

Other types of significant infrastructure project, such as highways construction, can also have adverse impacts on bat species if they are not planned with the needs of local species in mind. The Infrastructure Bill could provide a useful prompt to advance this conversation and ensure that action is taken to keep wildlife impacts to a minimum.
