



National Assembly for Wales:

Environment and Sustainability Committee Inquiry into Energy Policy and Planning

Evidence submitted by RTPI Cymru

Background

The Royal Town Planning Institute (RTPI) is a membership organisation representing over 22,000 spatial planners; RTPI Cymru represents the interests of almost 1,100 members in Wales. It exists to advance the science and art of town planning for the benefit of the public.

RTPI Cymru welcomes the Inquiry by the Committee. This evidence has been developed by RTPI Cymru's Policy and Research Forum, which has representatives from across the planning community in Wales.

General

The RTPI is committed to ensuring that planning addresses climate change as a matter of priority. The RTPI published its 7 Commitments to Climate change in 2010. The first Commitment is that the RTPI will promote understanding of how effective spatial planning helps meet carbon budgets and targets through managing demand for finite natural resources and energy usage. This means supporting individuals, organisations and communities to change their behaviour to:

- reduce the overall demand for energy and particularly for carbon consuming travel;
- shift increasingly to the use of renewable energy; and
- reduce the consumption of natural resources

The remainder of this paper addresses the specific planning related issues raised by the Committee.

The roles of the different consenting agencies, how they inter-relate and how the current system could be improved, both with and without further devolution

The Planning Act (2008) introduced a new process for consenting nationally significant infrastructure projects (NSIPs), including major energy projects, using a system of National Policy Statements (NPS) and a decision making process and single consenting regime by the Infrastructure Planning Commission (IPC). The Localism Bill proposes to amend this, with the final decision on projects being made by the relevant UK Government Minister, rather than the IPC.

This system applies in Wales for renewable energy projects on land over 50MW and over 100MW offshore. However those elements contained within the Devolution settlement are excluded from the IPC process. These associated developments, for example sub-stations, are dealt with by the Local Planning Authority (LPA) as a planning

application. This is a fragmented system for determining all the elements of a large energy project, with two separate policy regimes in use.

RTPI Cymru supports the argument that decisions on nationally significant renewable energy projects i.e. over 50MW on-shore and 100MW off-shore, should be devolved to Wales, as they are in Scotland and Northern Ireland. This will facilitate the ability to deliver a comprehensive renewable energy strategy in Wales.

LPAs are able to play a role in the IPC process through the ability to comment upon the quality of the applicant's consultation process and producing a Local Impact Report (LIR), as well as commenting as an Authority on the application. LPAs receive no fee for applications submitted to the IPC for consideration.

The planning applications for larger renewable energy projects, including wind farms, often have very complex issues to be resolved. The Welsh Government has provided grant support to LPAs to access expert advice and support on dealing with these issues; there is also funding available from the Welsh Government to LPAs needing to respond to IPC schemes within the SSAs. We would recommend that this support is continued. We would also recommend that the IPC be encouraged to provide similar support to LPAs for those schemes submitted that do not fit with the Welsh Government criteria.

The relationship between the UK Government's Energy National Policy Statements and Welsh national and local planning policies and whether or not these policies can achieve the Welsh Government's aspirations, including whether or not a formal review of TAN 8 is now required.

Planning Policy Wales (PPW) and TAN 8: Planning for Renewable Energy provide the national policy for Wales on renewable and low carbon energy. Much of the attention to this policy context is around on-shore wind farms, as they are currently the most commercially mature and Wales's topography is suited to them. However the policy and TAN 8 refer to a range of other renewable and low carbon energy sources. The RTPI believes that a mix of energy sources is required to continue to meet energy needs. However, an emphasis of Government policy should be, in the first instance, on reducing energy demand.

Through Planning Policy Wales and TAN 8 there is an established approach to guiding on-shore wind developments over 25MW to seven Strategic Search Areas (SSAs) across Wales. The RTPI believes that this approach provides a strategic method of directing these projects to more appropriate locations. However, the approach does not give an automatic presumption in favour of development within the SSAs; each proposal is also subject to other material considerations, as with any planning application and to an Environmental Impact Assessment (EIA).

The RTPI recognises that this is a working spatial policy for renewable energy and that this should not be undermined by the NPS process. Whilst Welsh Government policies are material considerations through the IPC process, it remains to be seen if they will be undermined by the NPS.

The draft national policy statements (NPSs) only consolidate existing (UK) Government policy and outline a framework for assessing development proposals. As a result they lack the spatial element of policy necessary for meaningful and informed decisions to be made about the location and/or routing of the envisaged infrastructures.

The NPSs' failure to provide spatial guidance means that there is no strategic means of assessing whether there is a need to provide a particular type of infrastructure in a particular place. This means that currently decision making at the investment stage is left entirely to the criteria of the infrastructure providers, thereby failing to take account of the needs and aspirations of other sectors of the wider community. Part of the purpose of the NPSs is to provide a context that enables investment decisions (by all parties - not just infrastructure developers) to be made on a strategic basis; the NPSs do not currently meet this purpose.

Being site-specific, or narrowing the field of search, enables investors to make more informed decisions, and makes consultation easier and more meaningful. Both communities and the infrastructure development industry need a more strategic policy context within which to make investment decisions, which the NPSs do not generally offer (except in the case of proposed nuclear sites). NPSs outline the need for infrastructure, but then leave it to the market to come forward with proposals for the location and type of energy infrastructure, effectively putting at risk the impetus to ensure energy security of supply.

There is a current call from a number of parties to review TAN 8; this call for a review is directed towards on-shore wind energy and the SSAs in particular. In considering whether a review is appropriate, it is important to recall the basis on which the SSAs were developed. Research was commissioned by the Welsh Assembly Government to assist with the drafting and implementation of TAN 8, originally published in 1995. Arup and its sub-consultants were appointed to undertake the research, published in 2005 (Facilitating Planning For Renewable Energy in Wales: Meeting the Target, 2005). The brief was to provide a map for Wales identifying SSAs capable of delivering the Welsh Government's renewable energy target of 4 TWh by 2010. The fundamental objective was to ascertain the most appropriate areas of Wales in which to locate the 800MW of onshore wind turbines minimising direct land take.

The Arup report states: "The research employed a land-use sieve approach applicable at an all-Wales level to identify *relatively unconstrained* areas according to nominated criteria. This data was then combined with information on the capacity of the existing and proposed grid network to produce a plan indicating broad strategic search areas for major wind energy developments, together with a strategic assessment of their potential wind energy capacity to 2010. The result of the analysis was the derivation of seven strategic areas for large-scale onshore wind energy development in Wales."

The SSAs have therefore been drawn up on the basis of evidence excluding agreed National and International designations, combined with other technical and practical factors. There was also consideration given to the cumulative visual impact of developments. Since the publication of TAN8 in 2005, LPAs have had the opportunity

to refine the boundaries of the SSAs. Given the methodology used for devising the SSAs, the RTPPI does not consider a wholesale review is appropriate. Instead, there remains the opportunity to consider material considerations and the Environmental Impact Assessment (EIA) for each proposal to be considered on its own merits.

Local planning policies in Wales are required to be in line with Welsh Government national planning policy. PPW states that LPAs “should plan positively for all forms of renewable and low energy development using up to date and appropriate evidence.” The Welsh Government has commissioned a Toolkit to support LPAs in this work.

The potential contribution and likelihood that different types of renewable and low carbon energy will be capable of delivering the Welsh Government’s aspirations for energy generation

The RTPPI is unable to comment on the generating capacity of potential energy sources. However it does support the promotion of a mix of energy sources to meet demand, preferably from renewable or low-carbon sources, but that the primary policy of all Government policy should be to reduce energy demand.

Indicative targets were set out in TAN8 for each of the SSAs; these have not been met to date. Welsh Government figures are that 175MW of the 2010 target of 800MW had been achieved.

There are currently a number of projects, with significant power generation capacity, awaiting determination by either LPAs or the UK Government. A fundamental issue which needs to be resolved before the applications can be determined, is that of transport access. Whilst there may be some other requirements specific to individual projects, such as landscape assessments, the predominant issue affecting the majority of projects awaiting determination is that of transporting the turbines to site.

The potential role of other forms of energy production in Wales

The RTPPI appreciates that to meet current energy demand, taking into account the state of energy infrastructure serving the UK at present, it is inevitable that some generation of energy using carbon sources is required. However, given the urgency of climate change, this should be kept to a minimum and that there should be a policy priority for reducing energy demand.

The transport issues relating to wind turbines and other forms of renewable energy including their impact on roads, traffic and tourism

The transport implications during the construction phase of these large structures, are significant through areas and along highways which are not suited to these Abnormal Indivisible Loads (AILs). This is likely to cause significant disruption to local communities, businesses and the tourist sector. The transport implications are a material consideration as part of the planning application, and also as part of the EIA. It is appropriate for the proposers of the developments to bring forward proposals to mitigate this impact, working with statutory agencies as appropriate.

Power Transmission Lines

The need for new power lines to serve both on and off shore wind farms is causing at least as much concern in local communities as the wind turbines themselves.

The RTPI has also argued in its response to the NPSs, that there should be a requirement to apply for consent for power transmission lines at the same time as the generating plant. It is obvious that generating capacity in new areas will require power transmission lines and in most cases these will tend to be above ground because of the prohibitive cost of putting them underground. However, it suits the power companies to obtain planning permission for the generation plant (e.g. wind farms below 50MW) first before making an application for the transmission lines and pylons. In this event the determining authority is under pressure to grant consent.

In TAN 8, “developers are encouraged to provide details of likely routes” at the time of application for the wind farm. There are currently no proposals for such a requirement in the NPSs.

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