

Small Scale Renewable Energy – SPG responses

Respondent	Comment	Recommended Response	Officer Recommended Change
<p>Glamorgan Gwent Archaeological Trust</p>	<p>We appreciate that within this in describing Policy SP9, there is already due regard for the historic and cultural environment, and the impact that the range of proposals may have on the archaeological resource is noted as a consideration.</p> <p>Archaeological mitigation may be a requirement of any application for renewable energy development, and this includes not only any direct physical impact but also the impact on the setting of all heritage assets. Particularly with some forms of renewable energy, such as turbines or large scale photovoltaic arrays, the visual impact may be wide ranging and should be considered within the assessment process at an early stage. These responses are necessary to enable the management of impacts on the archaeological resource and cultural heritage.</p> <p>Development of all types may have both a direct physical impact on buried and upstanding archaeological remains, and also visual impact on heritage assets. Less than 2% of these are on average Scheduled Ancient Monuments: Cadw have responsibility for the SAMs and must be consulted if any development is proposed that may impact them. For sites with non-statutory designations, archaeological mitigation work may be required both pre and post determination to ensure that</p>	<p>Comments noted</p>	<p>No change necessary at this point in time.</p>

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	<p>development complies with Planning Policy Wales Chapter 6: Conserving the Historic Environment, and the Welsh Office Circulars 60/96 and 61/96. Early consultation with your in-house staff, who have responsibility for Archaeological Planning, is advisable in all cases.</p> <p>The impact of any development on the setting of Scheduled Ancient Monuments, Listed Buildings and archaeological features without statutory designations has to be taken into consideration, and Cadw have produced Conservation Principles, to provide further detailed guidance when dealing with such issues, details at: <a href="http://cadw.wales.gov.uk/docs/cadw/publications/Conservation_Principles_EN.pdf">http://cadw.wales.gov.uk/docs/cadw/publications/Conservation_Principles_EN.pdf</a>. It should also be noted that archaeological features and finds exist outside Registered and Scheduled areas and may require pre-planning and conditioned archaeological mitigation.</p> <p>All archaeological work undertaken in relation to planning issues should be undertaken to the Standards and Guidance of the Chartered Institute for Archaeologists and it is our policy to recommend that either a Registered Organisation with the ClfA or a member with MClfA level membership should undertake the work.</p>		
The Coal Authority	Having reviewed the document, I confirm that we have no specific comments to make at this stage.	Comments noted	No change necessary at this point in time.

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CLA	<p>The CLA is the membership organisation for owners of land, property and businesses in rural England and Wales. We help safeguard the interests of landowners and those with an economic, social and environmental interest in rural land and the rural economy. Between them, our members own and manage about half of the rural land in England and Wales including edge of settlement locations and some urban portfolios.</p> <p>We have been looking after the interests of our members, as well as promoting the positive aspects of land ownership, land management and rural business activities for the past 100 years. The quality of the countryside and its natural resources are of vital importance to our members. Most objectives for the countryside - economic, social and environmental - rely on landowners and managers for their success. Equally, a healthy environment relies upon a thriving rural economy and financially viable agricultural businesses. An efficient, fair and transparent planning system that helps facilitate sustainable development is crucial to this.</p> <p>CLA Cymru supports the development of renewable energy schemes both as a means of reducing domestic/business expenditure and as a means of generating alternative income. In light of the evident need to support such projects, we are particularly</p>	<p>Comments are noted in relation to speed of determination.</p> <p>In relation to bullet point 6 on page 12 the remedial action if a carrier was to lose its contents is in relation to the effect and cumulative effect on biodiversity and earth heritage. This is necessary to understand the action that will be undertaken especially on protected land and species i.e. SSSIs and SACs.</p>	<p>No change necessary at this point in time.</p>

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	<p>concerned that by inflicting further administrative burden and costs upon developments the policy could well have a detrimental effect and act as a disincentive in considering alternative green energy technologies. The policy and the need for appropriate planning permission is but one of the considerations of such a project and whilst we accept that other considerations such as grid connection or NRW licence requirements are outside the control of the Park Authority, we believe that if the Park wishes truly to support such green energy projects, then their own contribution to the development should be streamlined, straightforward and at minimal expense. We regard the suggestion of a need for an Emergency Plan which incorporates consideration of remedial action should a transport carrier lose its contents (pg 12 bullet point 6) as a specific instance of overtly burdensome administration. No equivalent regard is necessary if, for instance, an oil or propane gas heating installation is in place. We strongly contend that to support green technologies, then barriers of extra administrative work should be avoided at all costs.</p>		
CDN Planning	<p>We appreciate that in some circumstances information should be provided with a planning application itself. For example, our applications for solar farms are usually accompanied by a Construction Management Statement setting out the likely construction time, the delivery routing, the likely vehicular</p>	<p>The 'How, when and why' is a consideration in determining the application and not a requirements for the submission of an application. Smaller developments may not require a Method Statement however this will be looked at on a case by case basis.</p>	<p>No change necessary at this point in time.</p>

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	<p>movements during this process and other details. However it seems inappropriate to be required to provide a Method Statement of the sort described in the Draft SPG.</p> <p>'How, when and why' suggests that at the planning application stage, the developer needs to know precisely when they will carry out the development. Although they will have best intentions at this stage, it cannot be precisely predicted due to so many variables (when permission is granted, discharge conditions, EPC details, weather conditions etc etc). Moreover, any information beyond that set out above in our Construction Management Statements are usually unknown at the planning application stage. At the very least extra information should be conditioned, rather than provided in a planning application, but we would still argue that the level of detail implied in the SPG would be unreasonable, imprecise and unnecessary for the purposes of development management.</p> <p>Finally we would also completely dispute the need to provide details of contractors, whether specialist or not. In fact it is usually very difficult if not imposed to arrange contractors for a scheme that has not yet got planning permission.</p>	<p>In line with Welsh Government there is a movement towards frontloading the planning system rather than conditioning statements. As such we would prefer to see these statements up front rather than through the discharge of condition process.</p>	
Llangynidr Community Council	48.6 4 <sup>th</sup> Bullet point not required, separate parts of the same paragraph.	Comments noted	Bullet point removed
Canal and	The Canal and River Trust fully support the	Comments noted and welcomed	No change necessary at this point in time.

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Rivers Trust	<p>document as we have been promoting the use of our canals in several ways for a number of years; This includes;</p> <ul style="list-style-type: none"> <li>• Canal water as a source for the heating and cooling of buildings</li> <li>• Using our river weirs for small scale hydro projects</li> <li>• Using our land for the provision of wind turbines</li> <li>• Taking surface water drainage</li> <li>• Acting as a route provider for underground telecoms and power cables</li> </ul> <p>We would particularly welcome the opportunity to promote the use of Mon and Brec canal for the heating and cooling of buildings, where financially viable, in your document. More information can be found at: <a href="https://canalrivertrust.org.uk/about-us/for-businesses/utilities">https://canalrivertrust.org.uk/about-us/for-businesses/utilities</a></p>		
Natural Resources Wales	<p>We advise that a recommendation is included in a suitable section of this document which recommends that small-scale renewable energy scheme proponents should, at the earliest possible stage in their application process, demonstrate that the selected technology accords with LDP policy SP9 and is thus the most appropriate development for its location and purpose.</p> <p>Additionally, we advise that the following is added to section 1.0 (Introduction): “Where permits, consents or licences from Natural Resources Wales are required, applicants are</p>	Comments noted and welcomed and the SPG amended accordingly.	<p>Para 1.5 has been added in to the introduction highlighting the need for pre-application discussions with NRW.</p> <p>Reference to the requirement of additional information and assessments if a development is likely to affect protected species, SSSIs and SACs has been added in to each of the technology types.</p> <p>‘Annex D’ has been added in to Para 2.4.5</p> <p>Section 4.4.4 has been amended to read ‘Landscape Visual Impact Assessment’ and not</p>

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	<p><i>encouraged to engage in pre-application discussions with NRW at the earliest opportunity.” We note that any of the technologies listed in the SPG may raise issues within NRW’s remit, and may therefore benefit from pre-application advice from us.</i></p> <p>With regard to location, we note that no reference has been made to Special Areas of Conservation (SACs) or Sites of Special Scientific Interest (SSSIs). We recommend noting in the SPG document that proposals with the potential to affect these protected sites may require more detailed information to allow for any additional assessments which may need to be carried out, such as Habitats Regulations Assessment by the Local Planning Authority for any proposed development with the potential to impact on a SAC or its designated features.</p> <p>Section 2.4.5 – please amend to read:  <i>“Paragraph 8.4 of <b>Annex D</b> of TAN8 Renewable Energy has the objective...”</i></p> <p>Section 4.4.4, in relation to wind turbine proposals, states: <i>“A landscape impact assessment is likely to be required. Applicants for such development are referred to the Authorities (sic) Landscape and Development SPG.”</i> Should this paragraph refer to LVIA rather than landscape impact assessment, or has the choice between landscape appraisal or LVIA been deliberately left open, so that the need for one or the other can be</p>		<p>‘Landscape Impact Assessment’.</p> <p>Para 4.4.5 has been amended as requested</p>

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	<p>decided on an individual basis?</p> <p>Section 4.4.5 – please amend to read: “...<i>The cumulative effect of [delete: the number of] turbines will also be taken into account;...</i>”. The cumulative impact with other wind turbine proposals in the vicinity should also be considered.</p>		
<p>NFU Cymru</p>	<p>NFU Cymru would like to offer the following comments for your consideration on the content of this consultation:</p> <p>In principle, NFU Cymru supports farm diversification into small scale renewable energy production, for export as well as for self-supply, where it supports profitable farming and underpins traditional agricultural production. We fully recognise that low-carbon energy production can actually enhance our national food security for only a modest land take.</p> <p>The agricultural industry is extremely susceptible to volatility and we do find some of our members wishing to manage the fluctuation of market prices, by diversifying into small scale renewable energy production. This in turn allows farmers to better manage their costs and may generate much needed additional income for the farming business.</p> <p>Small scale developments, are often complimentary to profitable agriculture and can enhance farm succession, especially where farmers own their own renewable</p>	<p>Comments are noted regarding the speed of determination of applications.</p>	<p>No change necessary at this point in time.</p>



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	<p>energy assets.</p> <p>As a Union, we feel that there is a place for renewable energy production and food production to co-exist and we would not wish there to be any barriers in terms of the planning process to prevent a small scale development from proceeding.</p> <p>We are aware that most local planning authorities have planning policies, which support the development of renewable energy schemes, where appropriate. However, speed of determination and the scale and nature of the information sought of the applications can perhaps vary significantly. This generally stems from the experience and understanding of the individual officers dealing with the applications. We sincerely hope that BBNPA planning officials gain a good knowledge of the merits of small scale renewable energy developments in order to minimise costs to applicants for additional surveys which may not actually be required.</p> <p>A key message is that the farming community in Wales can play an important role in helping the Welsh Government to meet both it's food demands and its renewable energy targets. We do however appreciate that members do have differing views and each individual application is different in its own right and we would continue to deal with requests for support on an individual case by case basis.</p>		

