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Jane Davidson AM
Minister for Environment, Sustainability and Housing
Welsh Assembly Government
5th Floor
Ty Hywel
Cardiff Bay
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Dear Jane,

Planning Policy Wales Section 12.8 Planning for Renewable Energy Consultation

- **These policy proposals are a critical part of delivering Wales' obligations, and will help to set Wales apart on in the international stage.**
- **Communities must be at the heart of developing the targets and plans for future renewable facilities.**
- **The existing Wales Spatial Plan teams can deliver this policy on a spatial basis, to help local authorities work together on solving one of the most critical problems we face.**

The Sustainable Development Commission are very supportive of these proposals to enable a stronger planning system for developing the renewable energy generation facilities that will be essential for Wales to meet its obligations on the global stage.

Question 1 – Scales

The Sustainable Development Commission supports the scale thresholds as suggested in the consultation for planning purposes, recognising that these will keep Wales in step with similar thresholds across the UK.

We would only caution that care should be taken when employing these thresholds in the delivery of projects. Spatially strategic projects, which would have a significant impact to a local area, should not inadvertently be given insufficient support from other stakeholders in the planning system because they do not trigger the strategic thresholds. This is not directly related to the planning system, but we would be concerned if important projects were not given sufficient support because of these thresholds.

Question 2 – Local targets

The Sustainable Development Commission also supports a framework that sets targets to help drive adoption of renewable generation technology. However we would suggest several important considerations are taken into account in how these targets are brought into being.

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Prior to any target setting work, we would urge the preparation of data giving an accurate baseline of what renewable technologies are already installed, under development or have planning consent. Without such data, and without regular updates to this information, the picture of progress will be unclear and confusing. This data would help to inform target setting locally, as well as assist in the creation of national policy. With accurate and timely data it could also contribute to one of a new suite of sustainability indicators. This recommendation is based upon the SDC's findings that it is difficult to identify good quality information on the prevalence of existing and planned community and small scale installations, and systems of this scale could make a significant contribution to meeting targets. Over time we recommend that this data is built up to cover both the number and capacity of facilities that are present, and also more qualitative information about the efficiency of schemes, and their outcomes in the local communities they serve.

With this baseline, we would then recommend that before work to develop targets begins that a very proactive consultation exercise is carried out, to engage local communities in the process. We believe that a substantial up-front investment of time in engaging with communities, particularly through methods which help to engage groups and individuals often under-represented in consultation exercises, will reap huge dividends in terms of support for projects as they come to planning and development stages. We would also urge that communities are given the opportunity to see how renewable generation facilities might impact their communities, by seeing and building a picture of what these technologies look like and the impacts they can have on community life. Consulting and engaging before specific projects are even thought about will provide a new model of government working that could be expected to drive up knowledge and understanding of renewable power generation amongst the population. Importantly, this would demonstrate realisable savings by reducing planning objections and appeals once projects come into existence.

The Sustainable Development Commission's preferred approach to developing targets and allocations would be to use the existing Wales Spatial Plan groups, to take advantage of their collaborative and integrative approach. We believe that by identifying opportunities and setting targets on a collaborative, spatial basis, the most effective range of projects can be developed, and this will further strengthen the role of the Wales Spatial Plan teams. We also feel that this joined-up approach will drive cooperation between stakeholders, and avoid unintended local market effects between areas.

Question 3 – Local allocations within LDPs

The Sustainable Development Commission supports this approach, and recommend that it follows the same model as suggested under the target setting discussed above.

Question 4 – National criteria

The Sustainable Development Commission also supports the guidance to help local planning authorities reach decisions around renewable energy projects. Again, we stress the importance of early engagement with all parts of communities to help avoid the risk of extensive planning appeals and challenges becoming the norm for renewables projects, as we feel that done well, this will have a far reaching effect on building community support for these facilities and help to avoid the need for such guidance to need to exist.



Question 5 – Other matters

We believe that these proposed changes to Planning Policy Wales will be an important step towards Wales meeting our moral and statutory renewables obligations, and will support the work to implement them. If delivered effectively, we believe that these proposals will bring about a step change in Wales' approach to renewable energy generation that marks our nation apart. We call on politicians and officials across departments to recognise the importance of this policy and the benefits it will bring, and to work together in the future to help to promote Wales on the world stage for its renewed approach to power generation.

Yours sincerely,

Peter Davies
Commissioner for Wales
Sustainable Development Commission