

Environment and Sustainability Committee

Inquiry into Energy Policy and Planning in Wales

EPP 178 – Design Commission for Wales

Comisiwn Dylunio Cymru



Consultation Response

22 September 2011

By Email to: E&S.comm@wales.gov.uk

The Clerk
E&S Committee
National Assembly for Wales
Cardiff Bay, CF99 1NA

Dear Colleague

Environment and Sustainability Committee – Inquiry into Energy Policy and Planning in Wales

Thank you for notifying us of this consultation. We welcome the opportunity to contribute. We have italicised the terms of reference, which provide a helpful structure. Our own comments are set out in plain text.

The terms of reference set out in the consultation letter are:

The Committee will consider how the current devolution arrangements for energy policy and planning affect the delivery of the Welsh Government's desired future 'energy mix' in Wales, as set out in A Low Carbon Revolution – Energy Policy Statement (2010) 1 and the UK Renewable Energy Roadmap (2011).

☐ *What are the implications for Wales if responsibility for consenting major onshore and offshore energy infrastructure projects remains a matter that is reserved by the UK Government?*

- ☐ *How does this affect achievement of the Welsh Government's aspirations for various forms of renewable and low carbon energy as set out in the Energy Policy Statement?*
 - ☐ *How does this affect delivery of the Welsh Government's target for a 3 per cent reduction in Green House Gas emissions per annum from 2011?*
 - ☐ *What will be the impact if consenting decisions on major infrastructure projects and associated development are not all taken in accordance with Welsh planning policy?*
- ☐ *Alongside these questions, the Committee will also consider the two petitions about Welsh Government planning guidance as it relates to onshore wind energy and the impact on local communities and infrastructure.*

Issues that the Committee will want to consider as part of these terms of reference include:

- ☐ *The role of the different consenting agencies, how they inter-relate and how the current system could be improved, both with and without further devolution (Infrastructure Planning Commission, Planning Inspectorate, Local Planning Authorities, National Parks, Welsh Government, Marine Management Organisation, Environment Agency).*
- ☐ *The relationship between the UK Government's Energy National Policy Statements and Welsh national and local planning policies (including Planning Policy Wales, Technical Advice Note 8 and Local Development Plans) 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.*
- ☐ *The potential contribution and likelihood that different types of renewable and low carbon energy (offshore wind, tidal, onshore wind, hydro-power, nuclear, bio-energy/waste, micro-generation, community energy projects) will be capable of delivering the Welsh Government's aspirations for energy generation as set out in A Low Carbon Revolution – Energy Policy Statement and the UK Renewable Energy Roadmap.*
- ☐ *The potential contribution of these different types of renewable energy to meeting the Welsh Government's annual target for Green House Gas emission reduction.*
- ☐ *The potential role of other forms of energy production in Wales e.g. existing fossil fuel energy generation, proposed nuclear generation and newer technologies such as coal-bed methane and shale gas.*
- ☐ *The transport issues relating to wind turbines and other forms of renewable energy including their impact on roads, traffic and tourism.*

The Renewable Energy Route Map for Wales consultation document published in 2008 aspired for Wales to be self-sufficient in renewable electricity production by 2025. Building on this and the Bioenergy Action Plan for Wales, the most recent policy statement, 'A Low Carbon Revolution' published in March 2010, sets out the following aims and targets:

'Our **aim** will be to renewably generate up to twice as much electricity annually by 2025 as we use today and by 2050, at the latest, be in a position where almost all of our local

energy needs, whether for heat, electrical power or vehicle transport, can be met by low carbon electricity production.'

It is unlikely that these can be met solely by small/community based schemes and therefore some large scale (>50MW) renewable generation schemes will be necessary.

The drivers identified to meet this target - low carbon electricity and renewable heat – are likely to involve projects above the 50MW (electricity) trigger.

If responsibility for consenting major onshore and offshore energy infrastructure projects remains a matter that is reserved by the UK government, the implications are that the Welsh Government may not have the power to deliver its own policy objectives and may be dependent on the UK for consent for larger schemes.

This could affect the achievement of the Welsh Government's aspirations for low carbon energy as set out in the Energy Policy Statement. The implication of this 'split level' decision making could be that Wales would default on its targets and could do nothing about it.

It would be possible for the Welsh Government to concentrate on smaller schemes which fall within its jurisdiction, but this approach is unlikely to meet the ambitious targets for carbon reduction.

However, the UK Renewable Energy Roadmap which includes the devolved governments is concerned to meet the legally binding target of an 80% reduction in CO₂ emissions by 2050. The UK government, in seeking to meet this commitment, will rely on contributions from the devolved countries to count towards its target. It would not therefore be in the UK's interests to delay or refuse applications for large scale renewable generation in Wales without good and clearly justifiable reason.

We note that the power to decide on large infrastructure projects is already devolved in Scotland.

Petitions relating to TAN8:

Integrated arrangements will be necessary for delivering grid connections and improvements, in order to realise renewable developments, which by definition will often be in remote places. Some work is probably necessary to upgrade the grid in Wales in the next few years, irrespective of renewable generation.

The UK government's Renewable Energy Roadmap states: 'We are taking action to reform the onshore grid and establish the framework offshore, necessary to deploy the levels of renewable electricity we anticipate are necessary for 2020.'

Enabling onshore wind farms and upgrading the national grid go hand-in-hand. However, it is important to recognise community concerns and respond sensitively, emphasising the wider community benefits referred to in 'A Low Carbon Revolution' (p14). 'Connections should run underground where they would otherwise impact on protected landscapes' (ibid, p15).

If a revision of TAN 8 is considered it should be with a view to setting higher targets for all renewables, not just onshore wind.

Additional comment:

The Design Commission for Wales already deploys its expertise toward a better built environment in Wales and has an overview of many projects of varying nature, including those which are related to or have implications around energy and other resources. Design quality and the wider impact of development or associated development on landscape, transport, traffic, tourism and local environmental quality are vital considerations which should apply throughout Wales.

We trust our comment is helpful and would be pleased to provide further information in whichever format the committee requires.

Yours sincerely

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About DCfW and the context in which it comments:

The Design Commission for Wales (DCfW Ltd) is a national organisation established in 2002 by the Welsh Assembly Government (now the Welsh Government), to champion better buildings, spaces and places. Design Commission for Wales Ltd (DCfW Ltd), is a wholly owned subsidiary of the Welsh Government.

The Commission champions high standards of architecture, landscape and urban design in Wales, promoting wider understanding of the importance of good quality in the built environment in the interests of sustainable development.

The Commission's work responds to four strategic aims set out by the Welsh Government, in its funding agreement:

1. To champion *high standards of design* and architecture to the public and private sector in Wales by promoting wider understanding of design issues and the *importance of good standards in enhancing the built environment* across all sectors.
2. To promote design practice that is compatible with the Welsh Assembly Government's Sustainable Development Scheme, *promoting best practice in energy efficiency, waste disposal and public transport.*
3. To promote design practice compatible with the highest standards in relation to *equal opportunity and promoting social inclusion.*
4. Give due regard to promoting *excellence in day to day developments*, like housing estates and industrial units, as well as promoting excellence in prestige projects.

The Design Commission for Wales is concerned with the quality of the built environment in Wales and to raise the design quality of buildings and the spaces between them, working with colleagues in the field of architecture, urban and landscape design and including consideration of the countryside as well as the cities, towns and villages of Wales. The skills and experience of its board, staff and voluntary panellists span commercial property, regeneration, architecture, sustainability, energy, urban and landscape design, procurement, planning and transport.

Capacity and programmes:

The Design Commission for Wales comprises a small paid operational team of 4 staff (one part time), and carries additional capacity in the form of its expert volunteers acting as **Design Review Panelists** and also through its **Advocates in Practice Network**.

Design Review Panelists are practicing professionals in their field, experienced in all kinds of development projects. The panel is multi-disciplinary, with members coming from the fields of urban and landscape design, architecture, sustainability, planning, engineering and transport. They are appointed through competitive interview for a term of two years, pending review and reappointment. Panel members are unpaid and give their time and expertise freely. Advocates in Practice, like DCfW's Design Review Panelists, are unremunerated. Typically they will volunteer their time, energy and expertise in promoting DCfW's messages about good design and in playing a part in activities, events, research and campaigns.

DCfW's programme includes:

- National Design Review Service –the quality of development schemes throughout Wales and the public investment therein (e.g in 2010 alone it scrutinised £1.8bn of development)
- Design Exchange for LPAs
- Bespoke professional training for LPAs
- Client support, mentoring
- Education: My Square Mile framework for Primary education
 Know Your Place framework for Communities
- Case studies
- Conferences, seminars, other events, publications
- Advocacy, public and community awareness

DCfW sponsors The National Eisteddfod for Wales Gold Medal for Architecture. It is the only award supported by the Design Commission for Wales, which attaches great importance to architecture as a vital element in the nation's culture and to honouring architects achieving outstanding design standards.