

Y Pwyllgor Amgylchedd a Chynaliadwyedd

Lleoliad:
**Canolfan y Dechnoleg Amgen,
Machynlleth**

Dyddiad:
Dydd Iau, 9 Chwefror 2012

Amser:
11:00

Cynulliad
Cenedlaethol
Cymru

National
Assembly for
Wales



I gael rhagor o wybodaeth, cysylltwch â:

Alun Davidson
Clerc y Pwyllgor
029 2089 8639
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Agenda

1. Cyflwyniad, ymddiheuriadau a dirprwyon

2. Ymchwiliad i bolisi ynni a chynllunio yng Nghymru – Tystiolaeth lafar (11.00 – 13.00) (Tudalennau 1 – 16)

11.00 – 12.00

Michael Phillips, Cyfarwyddwr a Phrif Ymgynghorydd, Dulas Ltd
Rod Edwards, Rheolwr Masnachol a Technegol, Dulas Ltd
E&S(4)-07-12 papur 1

Andrew Padmore, Prif Weithredwr, Egnida

12.00 – 13.00

Peter Davies, y Comisiynydd Dyfodol Cynaliadwy
Andy Rowland, Rheolwr, ecodyfi
E&S(4)-07-12 papur 2 – Ynni Cymunedol Cymru
E&S(4)-07-12 papur 5 – ecodyfi

Michael Butterfield, Prosiect y Cymoedd Gwyrdd Llangatwg
E&S(4)-07-12 papur 3

3. Papurau i'w nodi (Tudalennau 17 – 20) Cofnodion y cyfarfodydd a gynhaliwyd ar 26 Ionawr

E&S(4)-04-12 cofnodion
E&S(4)-05-12 cofnodion

**Ymchwiliad i bolisi ynni a chynllunio yng Nghymru – Gwybodaeth ychwanegol
gan West Coast Energy (Tudalennau 21 - 27)**
E&S(4)-07-12 papur 4



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Lord Dafydd Elis-Thomas
Chair, Environment and Sustainability
Committee
National Assembly for Wales,
Cardiff
CF99 1NA

Date: 21st September
Your ref: N/A
Our ref: 110921-PJH-MP
Our contact: Michael Phillips
Email: michael.phillips@dulas.org.uk
Direct tel: 01654 705015

Dear Sir,

Re: Energy Policy and Planning in Wales

I am writing on behalf of Dulas Ltd in response to your request for submissions relating to your inquiry into energy policy and planning in Wales.

Dulas Ltd originated in Wales and has been a well established renewable energy consultancy for many years now. We continue to expand as the market grows, and in part this has been due to the strength of planning policy in Wales since 2005 which has been a major stimulus to the growth of renewables in the country. As a company we would also support, in principle, further devolution of decision making powers to the Assembly where appropriate and where the Assembly is demonstrating the right level of governance and leadership that are in the interests of the Welsh people and international commitments on climate change.

In recent months we have become increasingly perturbed by messages emanating from Welsh Government in respect of policies on renewables. Not only have Ministers been making statements contrary to TAN8 and PPW but they are introducing considerable doubt into the minds of the people of Wales that the Welsh Government has the determination to follow through on its own policy and its international commitments. Particularly in this respect we point out that the recent statements that TAN 8 policy is now largely irrelevant, due to changes in UK wide policy toward the determination of large infrastructure projects, are very misleading. Under the UK planning system when TAN 8 was revised in 2005, decision making for wind energy projects in excess of 50MW was not a devolved matter and remained with the Secretary of State under the Electricity Act 1989, although it has always been understood that Welsh policy and the opinion of Welsh Government is a material consideration. Similarly, whilst the National Policy Statements set out the UK-wide policy on energy, they also state the requirement to have due regard to devolved and decentralised policy and planning policy. We do not as such comprehend the recent statements of Ministers that appear to contradict this situation.

The increasing failure of the present Government to follow through on its policy direction leads us to question whether further devolved powers would be in the interests of Wales. This position is very much unlike Scotland, where they are grasping the opportunity to become 100% reliant on



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renewable electricity by 2020 and in doing so are building a strong economic foundation in the energy sector for the nation. We had hoped that the Assembly would similarly follow such a path but we are no longer convinced that it is doing so.

May I remind your Inquiry that the current suite of policy documents in Wales on renewables and climate change have been predicated, to our knowledge, on maintaining the current status quo on devolved powers in Wales. As far as we are aware none of the policy framework relies upon greater devolutionary decision making to fulfil the objectives; whether the decisions are taken in Westminster or Cardiff we would hope that they reflect the need argument behind renewable energy, which is critical if we not to worsen further the potential impacts of climate change. I would also point out that current Welsh policy is falling behind our European commitments on renewable energy following the Renewable Energy Strategy 2009, which requires an even greater capacity of renewable energy if we are to succeed in delivering our greenhouse gas emissions reductions. It is understandable that more recent policy directions from UK Government, such as the National Policy Statements, may be considered to be superseding devolved policy in Wales – this is because they reflect the need for further renewable energy targets as set at the European level. Wales has a considerable resource for renewable energy generation, and as such is considered to be pivotal in delivering greater low carbon capacity. The moral imperative is therefore to ensure the delivery of such capacity to enable the achievement of more recent European requirements.

We do not feel that under the current climate in Wales we can support a move to greater devolutionary powers on energy until such time as the Assembly and the Welsh Government demonstrates that it can fulfil its current policy obligations and even take courageous steps towards increasing the commitment of our nation to further deliver a low carbon economy. To this end we would request the following of the present Government:

- Make strong assurances to the nation towards fulfilling its ambitions set out in the Energy Policy Statement 2010, and ensuring the delivery of the requirements of TAN8 and Section 12.8 of PPW 2011.
- Clarify that a low carbon economy with significant onshore and offshore renewables will require a new grid transmission and distribution infrastructure, which may themselves bring economic opportunity to deprived areas of Wales.
- Take a much stronger stance including investment in the green energy sector, particularly with the encouragement of a strong manufacturing and supply chain industry.
- Ensure that the local planning authorities in Wales work to deliver on our commitments. Currently there is considerable resistance to renewable energy at the local level, which is reflected in the emerging suite of Local Development Frameworks, and we see no evidence that the Planning Division at Welsh Government is doing its level best to ensure the LPAs are reflecting national policy. Furthermore, there are numerous examples where planning departments are being obstructive to the development of small scale renewable energy projects, and again, there is no evidence that the Planning Division at the Welsh Government is showing any interest.

- Send a strong signal to the renewable energy industry (and not solely the wind industry) that Wales is open for business. There is a growing feeling within the industry that Wales is resistant to renewable energy, and where new players are coming to Dulas to ascertain the potential for renewables, we have to tell them in no uncertain terms that such developments are risky and they may wish to consider going elsewhere.
- Publish regular updates regarding installed renewable generation compared to the targets set in Section 12.8 of PPW 2011 so that there can be benchmarking against progress, and where we may be failing against the targets thereby seek corrective action to get us back on track.

I do not wish to preach to those who may be knowledgeable already, but may I remind you of not inconsiderable challenge we are facing. In order to achieve our commitments to reducing greenhouse gas emissions by 80% by 2050, renewable energy will be foremost alongside energy reduction, energy efficiency and nuclear power is delivering on the commitments. Currently there is approximately 85GW of energy generation in the UK. This will reduce by 22GW of existing generation by 2020 as a result of tightening environmental regulations and ageing power stations, leaving only 63GW of power generation. If this figure is coupled with the expected increase in demand for electricity through to 2050, it is expected that the total capacity of electricity may need to more than double. As such we are likely to need a further 60-80GW of energy generation in the next three decades, a considerable increase on our current capacity. Only through bold and forthright governance at all levels will we be able to even begin making inroads towards these requirements. If we do not we will be reliant on imported energy which will increase our vulnerability to the market and geo-political change, and reduce our nation's resilience in the face of environmental change.

We strongly beseech the Assembly to look inwardly first at its current position on enabling Wales to attain a low carbon economy before embarking on requesting further devolved energy powers. We are not convinced that Ministers and decision makers are aware of the exacting requirements into the future for energy generation and until the Assembly convinces us of its awareness of the need argument and its commitment to it we will withhold any encouragement towards greater decision making powers for Wales.

Finally either myself or another senior member of staff from Dulas Ltd would be pleased to appear before the Committee if requested to present an opinion from a company in Wales facing the very real challenges of delivering renewable energy on the ground.

Yours sincerely

Michael Phillips
Director, Dulas Ltd

Environment and Sustainability Committee

E&S(4)-07-12 paper 2

Inquiry into Energy Policy and Planning in Wales – Evidence from Community Energy Wales

Community Energy Wales
Cynnal Cymru – Sustain
Wales
Ground Floor
Cambrian Buildings
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Cardiff Bay
CF10 5FL.

23 September 2011

Lord Dafydd Elis-Thomas,
Committee Chairman,
Environment and Sustainability Committee,
National Assembly for Wales,
Cardiff
CF99 1NA.

Dear Lord Elis-Thomas,

Re: Environment and Sustainable Committee Inquiry

We welcome the opportunity to respond to the Committee's inquiry into *Energy Policy and Planning in Wales* and provide the views of Community Energy Wales.

Community Energy Wales

Community Energy Wales, CEW, is an emerging network of practitioners and representative organisations, who work with and within the communities of Wales to develop energy generation and energy efficiency projects. With the support of organisations such as Groundwork, CAT, DTA, Cylch, WCVA and Cynnal Cymru, this network is being created to bring a single unified voice for those working at community level energy projects across Wales, and promote the successes of enterprises such as Amel Aman Tawe, Cwm Harry, Llangattock Green Valleys, and The Green Valleys amongst many others.

As the Environment Minister recently stated at the launch of Low Carbon Expo, this network will '*fill a clear gap in the energy sector by providing a strong support network and bringing a single unified voice for the Community Energy Sector in Wales*'. We will also work to influence policy-makers and promote the benefits that action at local level can bring to communities who establish their own community-led and/or owned renewable energy projects. As a network, we will be looking to develop sustainable financial mechanisms, such as revolving loan funds, which will be a critical element of driving long-term community-level energy projects across Wales.

This response is therefore based on the joint views of the network and brings together our position on the broader overarching issues of the focus of the Inquiry.

Welsh Government Targets

The Government's ambitions toward a low carbon energy future for Wales, as set out in the current Energy Policy Statement, and to '*maximise energy savings and energy efficiency in order to make producing the majority of the energy we need from low carbon sources more feasible and less costly*' are welcomed by CEW. These are positive steps towards decarbonising the power sector and helping to meet the carbon emission reduction targets in Wales.

To deliver this effectively, we would like to see stronger and more co-ordinated leadership approach from our policy-makers. This must include a long-term delivery plan that brings together respective departments with responsibilities for environmental policy, finance and budgeting, community regeneration and business and enterprise. It would need to be supplemented with clear lines of authority giving guidance on where responsibilities lie with respect to achieving the targets, their ongoing monitoring and reporting, and the delivery of the targets. Most importantly a communication plan which identifies and seeks to actively involve contributors from all sectors of the economy to meet these targets is also much needed.

Opportunities for a Low-Carbon future

Much as the targets for reducing carbon emissions and moving towards low carbon future are challenging, we believe that they also open up considerable opportunities for ways in which to deliver them. The increasing number of domestic and community-led energy generation projects in Wales shows the tremendous interest and enthusiasm of consumers, and needs to be encouraged widely. The introduction of Feed-in tariffs, and very soon Renewable Heat Incentives, are and will be key drivers for this trend. Specifically at community-level we have seen that where the community is involved from inception either through community-owned or -led initiatives, additional benefits have also been reaped. For example, communities are not only contributing towards lowering carbon emissions and increasing renewable energy generation, but are also regenerating communities particularly within rural and marginalised communities across Wales.

Community projects cannot be initiated without local buy-in, a strong vision to enhance their quality of life and wellbeing, and careful financial considerations. So at the heart of these community projects, has been the drive to deliver the benefits sustainably, over a long-term, and with strong financial models to support them. Some examples from our own network which show the positive benefits of community-led initiatives include:

- *Awel Aman Tawe*, a Community energy charity which grew out of a community meeting in 1997, and has since been involved in a number of renewable energy projects including managing the installation of hot water solar panels on local community centres, private dwellings and a cinema; heat recovery systems on 3 projects; two small scale PV/Wind turbine

projects; a District heating scheme providing heating for a number of houses from a wood chip boiler; and completion of a school photovoltaic roof.

- *Green Valleys*, a not-for-profit Community Interest Company, where all revenue from community-owned installations is to be reinvested in specific community-based carbon reduction projects, such as electric bike infrastructure or community woodlands that provide sustainably managed wood fuel. To date, it has delivered a 20% reduction in carbon dioxide across 155 households and four community buildings. Thirteen active community groups have also been established focusing on a variety of activities, including the establishment of allotments.
- *Groundwork Wales* have helped communities save 5910t of CO₂ emissions, enabled communities to divert over 1430t of waste from landfill, supported 660 groups with placements & energy advice, worked with over 285 schools on sustainable development, and delivered over 209 environmental management systems.
- *Llangattock Green Valleys*, with the beginning of the group in 2008, a group of local residents united with a view to reducing their community' carbon-footprints whilst developing a model that develops a strong community asset base through renewables with sustainable development being achieved long term breaking the dependency of grants. Considerable results have been achieved so far, including installing a borehole and solar-powered pump for irrigation at the Allotments; installing PV panels on the school roof and residential dwellings; bringing local woodlands back under productive management and providing a sustainable supply of wood-fuel for residents; establishing a litter picking group to drive communities to take more pride of their surroundings; progressing the installation of five micro-hydro schemes with four of the schemes having community buy in with income raised to fund other sustainable community projects; with a proposed Anaerobic Digestion, Biomass and District Heating Main Scheme that will see 700 homes including transport being carbon neutral and a 30% Equity stake for the Community Interest Company with an overriding vision to make Llangattock a Carbon Negative Community by 2015.

These are some of the many examples of positive action at community level, using smaller-scale renewable technologies, which have the potential to be replicated widely across Wales. We would be happy to discuss further these and other projects within the network that are endeavouring to lead the way for a low-carbon future in communities across Wales.

Barriers to development

It is important to note, however, that these achievements had been attained despite a number of barriers along their way. These barriers can principally be categorised into three areas: i) consents and the permission processes which can be time-consuming and expensive; ii) costs associated with purchasing the systems, and skills needed for their installation, and maintenance; and, iii) long-term sustainable finance, where currently there is a great lack of clarity on if, and

how, state-aid rules regarding grant-funded schemes affect income generated from FITs.

We believe that these issues are creating real obstacles at community-level which could lead to significant delays or even withdrawal of projects that may be at planning or implementation stages. We would therefore look to local and national government to provide strong and strategic leadership and bring, where possible, clarity to their guidance, and a more standardised approach to decision-making that are outcome-focused and objective. This could include expanding the Clause in TAN8 to support community-level energy applications in and around the current Strategic Search Areas (SSA), as well as ensuring that a proportion of the community benefits from commercial wind schemes are put towards further reductions in carbon emissions at local level.

Moreover there is also a critical need to improve and enhance the skills of local groups through quality training that is specific to the needs of community-led energy projects. Some of the issues outlined above could be addressed by reviewing and prioritising the focus of existing Government-led community-focused programmes.

Looking Forward

The Welsh Government has estimated that 0.9% of its 3% annual reduction target will come from '*wider contribution of others in Wales*' (Ref: Climate Change Strategy Delivery plan Strategy for Wales, <http://wales.gov.uk/docs/desh/publications/101006ccstratdeliveryemissionsen.pdf>). We firmly believe that there is a key role for the community energy sector in this, with the contribution it can bring towards helping to meet the national targets for carbon emission reductions, whilst at the same time regenerating communities across Wales. The Energy Policy Statement is a first and important step in this delivery, however a more detailed delivery plan backed with strong leadership and buy-in from key governmental departments and local government would be the necessary next step to help deliver these targets. We would welcome the opportunity to meet with you and the Committee members to discuss our response further. If you require any further information, please do not hesitate to contact me directly via email at rita@cynnalcyrmru.com.

With regards,

Rita Singh
Project Co-ordinator
Community Energy Wales

Environment and Sustainability Committee

E&S(4)-07-12 paper 3

Inquiry into energy policy and planning in Wales – Evidence from Llangattock Green Valleys



Lord Dafydd Elis-Thomas
Committee Chairman
Environment and Sustainability Committee
National Assembly for Wales
Cardiff
CF99 1NA

03rd February 2012

Dear Lord Ellis-Thomas

We welcome the opportunity to respond to the Committee's inquiry into Energy Policy and Planning in Wales and provide the views of Llangattock Green Valleys through our model of developing a Carbon Negative Community by 2015.

Llangattock Green Valleys and its trading subsidiary of LGV Ventures is a growing community interest company based in the rural Welsh village of Llangattock in the heart of the Brecon Beacons National Park. Llangattock is a relatively small community numbers wise – around 420 homes and some 1,300 residents. But it's spread over two sides of a valley, with the village itself surrounded by four scattered hamlets – a situation that presents both challenges and some unique opportunities.

Llangattock Green Valleys started out in 2008 as a loose collection of residents who shared a broad vision of creating a cleaner, greener, more sustainable future for our community. Today that vision is becoming a reality. Many of our members are interested in harnessing our natural local resources – things like water, wind and solar power, along with wood fuel – to reduce our community's need for fossil fuel and help us all save money. But we're also keen to explore ways that we can work together to create a richer way of life, from growing and rearing more of our own food locally, to helping people learn new skills and creating local jobs. **Our principal objective is to establish Llangattock as a Carbon Negative Community by 2015, ambitious but achievable.**

By sharing knowledge, forging innovative partnerships and encouraging the whole village to get involved in

Llangattock Green Valleys Community Interest Company
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a range of ambitious projects that are already making a real difference. In November 2009 we won the Welsh heat of the British Gas Green Streets competition. As well as being selected as one of 14 communities to take part in the 15-month Green Streets challenge, we also received over £137,400 worth of funding to help kick-start our plans. Then we went out and secured additional match funding so we could achieve even more. We went on to win the Green Streets challenge in 2011 and secured a further £100,000.

Early on we recognised that our eight project streams could be defined as two key drivers in developing our model of a Carbon Negative Community. Community Involvers firstly sees the project streams that involve the community with:

- **Community Enhancement (Llangattock Litter Pickers)**

Llangattock Litter Pickers have become a beacon for our community – clearing over 920 bags of litter and 258 tyres in and around the community since their first litter pick back in November 2009. Each month they cover some 60 miles of roadside verge, and along the way they've ensured their own sustainability by selling scrap metal from fly tipping, securing just under a 82% recycling rate of litter collected and forging a paid-for partnership with the local Beaufort Estate, which is responsible for much of the common land around the community. They have also teamed up with the Brecon Beacons National Park, the Environment Agency and Powys County Council to help clear a massive fly tip from a nearby Site of Special Scientific Interest.

- **Transport (Llangattock Biodiesel Club)**

Discovering the benefits – and drawbacks – of biodiesel. We set up a biodiesel club in January 2010, working with a small-scale local supplier who made biodiesel from used cooking oil and delivered in 25-litre containers – which suited us perfectly. Membership grew rapidly, and in just 6 months we distributed 11,500 litres of biodiesel, saving 29 tons of carbon emissions. Unfortunately our supplier ceased trading, and bigger suppliers will only deliver in bulk. So for now the club is on hold while we investigate the possibility of installing a bunded tank.

- **Woodlands (Llangattock Community Woodland Group)**

With the group coming about to promote biodiversity within the local woodlands. Currently managing woods for 2 private landowners and working in partnership with British Waterways to manage small canal side woodland in the village. With a locally sourced fuel coming from the woodlands. The purchase of a firewood processor speeds up the time it takes to cut and splits the wood fuel from the woodlands under management, making the whole process more efficient. While the community wood stores allows the capability of storing and seasoning the wood fuel properly for distribution within the community.

- **Allotments (Llangattock Area Community Allotments Society, LACAS)**

With their first growing season in 2009, it soon became clear that, even in Wales, rain alone was not enough. Connecting to the mains was expensive and meant ongoing bills, so the group applied for planning permission for a borehole irrigation system powered by solar PV panels to giving them an independent supply of water and electricity. The system went live in March 2011 and is working well. In addition to providing 46 plots (plot holders include the school and a local restaurant), LACAS has planted more than 800 native hedging whips and established a community orchard featuring local fruit varieties. The society has also set up a bee club and reinstated the annual summer show, which has been missing from the community for some years. Improved access to the allotment with the installation of a grasscrete driveway and car park allowing

disabled access is now in place with raised beds to meet community members needs who are not able to tender an allotment at ground level will be forthcoming with the plots being self irrigated.

- **Residential**

With the foundations laid by British Gas's Green Streets project which brought about 38 homes becoming more energy efficient, starting with energy surveys and following this up with energy efficiency improvements ranging from energy monitors, heat-reflecting radiator panels to new central heating boilers and wood stoves installed into the homes of residents. 12 homes chose to install solar PV panels (where the community had 0 at the start of 2010) with a 34 kW Biomass boiler with solar thermal back up.

Learning from the Green Street's project, Reach For The Renewables came to market offering a stable of renewable technologies and energy efficient measures. Operated under licence, Llangattock Green Valleys is now reaching beyond Llangattock with the Reach For The Renewables offering whilst providing revenue for Llangattock Green Valleys.

Llangattock Green Valleys has been successful in securing £108,000 of funding from DECC's Local Energy Assessment Fund (LEAF) coupled with match funding. We will deliver energy efficiency measures that will include loft and cavity wall insulation, energy monitors and heat reflecting radiator panels in tandem with voltage optimisation to 123 properties in the community by the end of March 2012. Reaching out to over 30% of the properties in the community is testament to Llangattock Green Valleys ambition and drive to bring about the much needed change. Demonstrating that the community is beginning on mass to get behind the drive and ambition that Llangattock Green Valleys has laid before it.

We will use the success of the LEAF project to reach out to an even greater number of properties in the community in 2012 with targeted projects that will see properties that have been involved in previous projects being offered the opportunity in benefiting from bulk buying opportunities through the Reach For The Renewables offering.

We use the word involvement not engage or engagement. Engagement (a term commonly used by government and corporates) is in our eyes a term that only promotes a one way relationship where as involvement sends a clear message to the community that we ask them to believe not just in our ability at Llangattock Green Valleys to bring about the much needed change but in theirs.

Community Involver project streams are the key drivers in restoring a sense pride and well being back within the community. Showing community members that pointing the fingers to organisations such as community/town councils, local and central government is no longer the way to bring about the change that is needed in communities but to look at themselves in bringing about the change not only for themselves but for the community they live within.

The Community Involvers are reliant in the initial years from grant based funding but through our Community Asset Builder project streams the reliance is broken in the medium to long term. Community Asset Builder project streams consist of:

- **Community Buildings**

Made our infant & primary school a warmer, more energy-efficient building, with better insulation

(cavity wall and loft) and a 4kW solar PV system installed in January 2011. These panels should generate around £1,500 extra income a year for the school, along with electricity it can use during the school day – a total benefit worth around £2,000 to the school each year. As a direct result of the Green Streets improvements, Powys County Council has in the summer holidays of 2011 installed new sensor-controlled low-energy lighting at the school and have replaced the school's original 1977 air blown old heating system for a gas condensing boiler with new radiators with heat reflecting panels throughout the school supported with web based control and monitoring system. Aluminium framed double glazing windows and doors have also been installed at the school as well. We've secured planning permission to add an additional 12.42kW of solar PV panels - enabling the school to generate a significant amount of its daily electricity requirement, and making it even more energy efficient. With British Gas providing 50 volunteers from their Cardiff Call Centre to paint classrooms and cloakrooms at the school and purchased 10 new computers for the school as part of their community engagement programme.

Under the LEAF project we will be bring about a £11,000 voltage optimisation unit for the school and attached community hall along with energy efficient lighting in the main hall of the school with a feasibility study looking at the possibility of micro-wind at the school. Reaching out to Crickhowell School with a £28,000 voltage optimisation under the project is testament to Llangattock Green Valleys ambitions of not just bringing about change in the community but beyond.

Installed a new 25kW Air Source central heating system in the Community Hall. The scheme replaces an old inefficient electric heating system that cost a lot to run and never worked very well. We have also secured planning permission to install an 11.04kW solar PV scheme on the hall roof to provide some of the electricity the ASHP will require. With a 400mm top up to the loft insulation at the Community Hall given a depth of 450mm, we are assisting the Hall Committee in bringing about a sustainable future for the Community Hall.

Under the LEAF Project we will be installing £12,500 of further insulation to the eaves in the main hall of the community hall looking to achieve a minimum COP of 1:4 from the Air Source heating system with thermal lining to the curtains adding to the existing measures. Energy efficient lighting will be installed throughout the Community Hall as well.

- **Micro Generation**

Set the wheels in motion for 5 micro-hydro schemes. Initially, we'd envisaged a single community scheme, but once word got round, several landowners came forward, some of whom have now joined forces to develop more powerful schemes. Together, these 5 schemes will generate over 450MWh electricity a year (enough to power 118 homes) – with 4 of the schemes also generating FiTs income for Llangattock Green Valleys. Legal agreements for these schemes are currently with the landowners, after which we'll be pressing ahead with planning and environmental permitting applications, with the aim of starting groundworks. The four schemes that have a community buy in element have the capability in proving £53,000 of income index lined post debt repayment in year 6 producing a total cash return of £977,000 within the FiTs regime (20 years) for Llangattock Green Valleys.

Under the Reach For The Renewables offering we are expanding into a range of renewable technologies that will give us a balanced portfolio of renewable technologies over the medium to long term.

- **Community Scale Energy Generation**

Funded an in-depth feasibility study into a proposed Anaerobic Digestion (AD) facility, which will be developed in partnership with The Glanusk Estate, one of our major local landowners. Designed to run largely on grass cuttings, with the addition of some green maize, glycerine and slurry. Brining about the delivery of 254m³ of Biomethane directly injected into the gas grid every hour.

We are now proceeding into the Working-Up Stage with the AD facility which will bring us one step closer to brining online one of the first biomethane ADs in Wales with an investment of over £3.2 million pounds needed it goes to show the commitment of both Llangattock Green Valleys along with our partners, The Glanusk Estate in building a strong platform for sustainable development here in Llangattock. In the long-term this scheme would also provide Llangattock Green Valleys with a sustainable income having secured a 30% equity stake.

Developing a community scale energy generation project is the keystone to developing Carbon Negative Community models. It is the project that brings about significant carbon savings but the project that is the cash cow that breaks the reliance of the grants system. With projected gross annual income of £1.3 million, Llangattock Green Valleys stake allows it to further develop not only its model but assist fledging community energy organisations coming through with the much needed early assistance to realise their ambitions.

Developing a Carbon Negative Community by 2015 must be built on a platform of community asset building where sustainable development takes place without the long term reliance of grant funding which must be broken if our model is too reach its full potential. Whilst grants are a good way of bringing about the catalyst to the much needed change within communities they must not be seen as the basis to proceed through the medium to long term in building a sustainable business model.

Sustained activity, early infrastructure deployment and stakeholder buy in/involvement is fundamental if the reliance of the grant culture is to be broken. Llangattock Green Valleys has set a goal of being non grant dependant by the end of 2013 and we are confident we will achieve this.

Through our recently incorporated trading subsidiary of LGV Ventures CIC (where Llangattock Green Valleys CIC is sole shareholder) we will see the equity holdings in the micro hydro schemes, anaerobic digester, solar PV and all other tradable activities being held within this trading subsidiary of Llangattock Green Valleys.

Stakeholder involvement is key to delivering our goal of a Carbon Negative Community by 2015. We cannot bring about the goal on our own and look to our stakeholders to “walk together” with us in achieving the goal of a Carbon Negative Community by 2015. Since the inception of Llangattock Green Valleys it has been and continues to be not acceptable for stakeholders to sit on the sidelines with encouragement provided for active involvement in the development of our model.

We are of the firm belief that our destiny is not being written for us but by us. Together we can make Llangattock and the surrounding area an area that can inspire many more communities in Wales to bring about the much needed change and begin to believe that the impossible is possible. Llangattock has come together with a common purpose. It’s not just the numbers that are so inspiring but it’s the people behind these numbers. These people have led us to believe that when it comes to what is wrong in our community, the community members are not the problem but the answer.

A growing number within the community are now becoming confident in their belief not content to settle for the community as it is and who have the courage to remake the community as it should be.

Llangattock Green Valleys is clearly demonstrating that something better awaits us if we have the courage to work for it, reach for it and to fight for it.

Welcome to Llangattock Green Valleys, welcome to a fresh and deliverable approach to making a Welsh rural community sustainable and carbon negative.

But why stop there?

Wales has a government that is progressive on the environment, sustainable development and renewable energy fronts. We are fortunate to have such a government in Wales. With Llangattock Green Valleys developing a good working relationship this key stakeholder and one we will look to strengthen going forward.

We are on the cusp of seeing the backbone of a framework being developed here in Wales through the soon to be launched Community Energy Wales. Wales lacks the framework to allow progressive community energy organisations like Llangattock Green Valleys to mentor fledging organisation coming through the ranks.

The Welsh Government must play a key role through partnership with Community Energy Wales in breaking the barriers that are set before us in Community Energy. Barriers such as planning, environmental permitting and state aid related issues to name but a few. Allowing the fledging community groups to be progressive in the knowledge that through on organisation like Community Energy Wales the path in front of them will not be as challenging as the one faced by Llangattock Green Valleys and other Community Energy groups previously.

Whilst Llangattock Green Valleys welcomes programmes such as the Ynni'r Fro funding programme which we have benefited from by over £34,000 of funding already with us accessing a commercial loan in the coming months to develop our AD scheme through the working up stage. It must be said that the funding programme has been beset with issues mainly focused around state aid issues with the Welsh European Funding Office (WEFO) not aiding matters. Where Ynni'r Fro was envisaged at conception to break down barriers for community scale energy generation schemes it has actually created more barriers. But we must go on record and pay particular thanks to Welsh Government officials whom have and continue to overcome the bureaucracy.

The Welsh Government must play a pivotal role in instilling through local authority and community/town councils that developing a collaborative approach with Community Energy groups is the way forward. Llangattock Green Valleys experiences of local authority (namely Powys County Council) have been such that quite frankly if common place amongst local authority gives us grave concern if we are to achieve to the potential of Community Energy across Wales.

Community Energy must if it is to fully realise its potential be more commercially driven operating on business principles and discipline. Solely relying on ethical practices is one that will not allow the sector to be taken seriously by Government and as a sector must sell itself to Government in the belief that it can provide a scale that is capable of delivering a significant impact to Government policy targets that will command the support and confidence from Government that Community Energy is a sector that is one worth partnering up with.

Llangattock Green Valleys Community Interest Company
Registered No. 7255186
Registered Office: CRiC Centre, Beaufort Street, Crickhowell, Powys, NP8 1BN

www.llangattockgreenvalleys.org

We must be very wary of the relationships that the Community Energy sector builds with the big six energy companies. Whilst they must play a part in the development of Community Energy we must be mindful that we they must recognise that it will not all be on their terms. Given Llangattock Green Valleys experiences of one of the big six energy companies, namely British Gas.

Community Energy organisations must not fall into the trap that can be set before them of partnering up with one of the big six energy companies where their installations for certain renewable energy technologies costs are such that they take away wealth creation opportunities for Community Energy due to the need not only to service their obligations towards their shareholders but also their high cost base which is reflected in their price per kW installed.

The big six energy companies talk of building trust again with their customers and communities but this must not be at the cost of wealth creation opportunities for Community Energy groups nor sacrifice the trust built up with the communities by the Community Energy organisation.

Attractive lending terms by big six energy companies to Community Energy organisations are soon lost with inflated costs for the installation of renewable energy technologies where the Community Energy organisation is tied to the big six energy company for the installation of the technologies in order to access the lending. Community Energy must mindful and wary that it does not become the haven for the big six energy companies to restore their trust in their customers and the communities they serve.

The challenge that is before us in communities commands a response that must be one that not only rises to the challenge but leaves a lasting legacy built on sound business principles and discipline to allow the next generation to take the baton from us and take it to an even greater level than the one we will hand over to them.

We know that within communities there is an abundance of skills, knowledge, and experience and above all else the motivation, drive and ambition that is far greater than any government, corporate or NGO. When you know that your community can and is able to bring about the much needed change that is needed and the belief in the knowledge that there is a better way forward there is only one outcome.

Improving the capability of community leadership, increasing community involvement and support, building organisational capability and developing effective partnerships are key elements to the success of not only Llangattock Green Valleys but the Community Energy sector. But this must be seen within the Community Energy sector as key areas to development of the sector if it is to realise its ambitions and achieve its true potential.

Developing models that deliver Carbon Neutral/Negative Communities by 2025 or 2050 will come too late. The Community Energy sector must set its sights and ambitions on achieving the much needed response to the challenges set before it in the next 5-10 years.

Yours sincerely

Michael Butterfield
Director, Llangattock Green Valleys CIC & LGV Ventures CIC

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Environment and Sustainability Committee

E&S(4)-07-12 paper 5

Inquiry into energy policy and planning in Wales - Evidence from ecodyfi



Y Plas
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6/2/2012

Lord Dafydd Elis-Thomas,
Committee Chairman,
Environment and Sustainability Committee,
National Assembly for Wales,
Cardiff
CF99 1NA

Annwyl Dafydd

Energy Policy and Planning in Wales Inquiry

I should like to add a few points to the evidence submitted by Community Energy Wales and Llangattock Green Valleys.

1. Some of the communities to have benefitted from investments in renewable energy have done so because they have had small grants from the Mid Wales Community Energy Trust, in part. This applies to Trefeglwys and Carno in Montgomeryshire. Trefeglwys School has a PV installation and had related input into the classroom. Carno Community Centre has a wood pellet boiler to heat the building, with improved heating controls, replacing oil.
2. Mid Wales Community Energy Trust (known as Windfall) exists to re-invest funds donated by commercial developers of renewable energy into sustainable energy projects in communities. These grants may be for microgeneration and/or energy demand reduction measures. Developers sometimes choose to donate part of their commitment to Windfall so that the carbon benefits of their development are multiplied, while donating the other part to the more usual local funds for diverse community benefit.
www.windfall.org.uk

ecodyfi is registered as a company limited by guarantee at Companies House, Cardiff. Its full name is Partneriaeth Eco Dyffryn Dyfi Eco Valley Partnership; company number 382 5561. Its registered office is Bull House, 15 Heol Penrallt, Machynlleth SY20 8AG.

Mae **ecodyfi** wedi'i gofrestru fel cwmni sydd wedi'i gyfyngu gan warant yn Nhŷ'r Cwmnïau, Caerdydd. Ei enw llawn yw Partneriaeth Eco Dyffryn Dyfi Eco Valley Partnership; rhif cwmni 382 5561. Ei swyddfa gofrestredig yw Bull House, 15 Heol Penrallt, Machynlleth, SY20 8AG.

3. We recommend that this approach is reinforced by planning authorities and the Welsh Government, such that some monies from wind developers are ring fenced for climate change actions at community level.
4. Welsh Government itself is managing a programme to facilitate community scale renewable energy, called Ynni'r Fro. It is delivered by the Energy Saving Trust for Wales with EC structural funds.
5. Barriers to community owned wind turbines include objections from the Ministry of Defence on radar grounds. This sterilizes much of Ceredigion and NW Wales because of the Aberporth and Valley establishments. After successfully trialling a radar system that can ignore the spinning blades of turbines, the MoD announced in mid January that contractor SERCO had installed and successfully tested a Lockheed Martin TPS-77 Air Defence Radar at Trimmingham on the Norfolk coast, which allows it to conditionally scrap its objections to five offshore wind farms in the Greater Wash. Could Welsh Government broker such an agreement in Wales?
6. Wind hysteria in Montgomeryshire is such that some Town and Community Councils seem to be registering objections to all wind turbine proposals, however small. Not deciding on the merits of the individual case is inappropriate as a planning procedure.
7. The capacity of the "grid" to allow export of microgeneration is often an issue, as is the cost of strengthening it. High head hydro sites are often unviable because of the cost of upgrading single phase lines to three phase. The UK has "deep" connection charges to the distribution system i.e. the generator pays an apportionment of all costs upstream. Consideration should be given to the German model of "shallow" charges, which often are cheaper because the Distribution Network Operator carries some of the costs higher up the system, which often increase robustness.

I hope this is of help.

Yn gywir

Andy Rowland
Manager / Trefnydd
andy.rowland@ecodyfi.org.uk

ecodyfi is a membership organisation, bringing people together to foster sustainable community regeneration in the Dyfi Valley

Mae **ecodyfi** yn sefydliad aelodaeth, sy'n dod a phobl at ei gilydd i fabwysiadu adfywiad cymunedol cynaliadwy yn Nyffryn Dyfi

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Y Pwyllgor Amgylchedd a Chynaliadwyedd

Lleoliad: **Ystafell Bwyllgora 3 – Senedd**

Dyddiad: **Dydd Iau, 26 Ionawr 2012**

Amser: **09:00 – 12:10**

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Cofnodion Cryno:

Aelodau'r Cynulliad:

Dafydd Elis-Thomas (Cadeirydd)
Rebecca Evans
Russell George
Vaughan Gething
Llyr Huws Gruffydd
Julie James
William Powell
David Rees
Antoinette Sandbach

Tystion:

Cynghorydd Estelle Bleivas, Cyngor Tref y Trallwng
Robert Robinson, Cyngor Tref y Trallwng
Nick Oliver, AECOM
Kevin McCullough, Panel y Sector Busnes, Menter, Technoleg a Gwyddoniaeth
Chris Mills, Asiantaeth yr Amgylchedd Cymru
Kevin Ingram, Asiantaeth yr Amgylchedd Cymru

Staff y Pwyllgor:

Catherine Hunt (Clerc)
Marc Wyn Jones (Dirprwy Glerc)
Andrew Minnis (Ymchwilydd)
Nia Seaton (Ymchwilydd)

1. Cyflwyniad, ymddiheuriadau a dirprwyon

1.1 Cafwyd ymddiheuriadau gan Mick Antoniw. Nid oedd neb yn dirprwyo.

2. Ymchwiliad i bolisi ynni a chynllunio yng Nghymru – Tystiolaeth ar agweddau yn ymwneud â chludiant

2.1 Bu'r tystion yn ymateb i gwestiynau gan aelodau'r Pwyllgor am agweddau ar bolisi ynni a chynllunio yng Nghymru sy'n ymwneud â chludiant.

3. Ymchwiliad i bolisi ynni a chynllunio yng Nghymru – Panel y Sector Busnes, Menter, Technoleg a Gwyddoniaeth

3.1 Bu Mr McCullough yn ymateb i gwestiynau gan aelodau'r Pwyllgor am bolisi ynni a chynllunio yng Nghymru.

4. Ymchwiliad i'r achos busnes dros un corff amgylcheddol

4.1 Bu'r tystion yn ymateb i gwestiynau gan aelodau'r Pwyllgor am yr achos busnes dros un corff amgylcheddol.

TRAWSGRIFIAD

Gweld [trawsgrifiad o'r cyfarfod](#).

Y Pwyllgor Amgylchedd a Chynaliadwyedd

Lleoliad: **Ystafell Bwyllgora 3 – Senedd**

Dyddiad: **Dydd Iau, 26 Ionawr 2012**

Amser: **13:00 – 16:30**

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Cofnodion Cryno:

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William Powell
David Rees
Antoinette Sandbach

Tystion:

Keith Davies, Cyngor Cefn Gwlad Cymru
Morgan Parry, Cyngor Cefn Gwlad Cymru
Jon Owen Jones, Comisiwn Coedwigaeth Cymru
Trefor Owen, Comisiwn Coedwigaeth Cymru
Nigel Annett, Dŵr Cymru
Tony Harrington, Dŵr Cymru
Mike Harvey, Planhigfeydd Coedwig Maelor Cyf.
Alice MacLeod, Planhigfeydd Coedwig Maelor Cyf.**Kath McNulty, Cydffederasiwn Diwydiannau Coedwigoedd (Confor)**
Aneurin Phillips, Awdurdod Parc Cenedlaethol Eryri
Emyr Williams, Awdurdod Parc Cenedlaethol Eryri
Aled Davies, Cyngor Gwynedd
Louise Fradd, Cyngor Bwrdeistref Sirol Pen-y-bont ar Ogwr
Craig Mitchell, Cymdeithas Llywodraeth Leol Cymru

Staff y Pwyllgor:

Marc Wyn Jones (Clerc)
Catherine Hunt (Dirprwy Clerc)
Nia Seaton (Ymchwilydd)

1. Cyflwyniad, ymddiheuriadau a dirprwyon

1.1 Cafwyd ymddiheuriadau gan Russell George a Julie James. Roedd Gwyn Price yn dirprwyo ar ran Julie James.

2. Ymchwiliad i'r achos busnes dros un corff amgylcheddol – tystiolaeth lafar

2.1 Bu'r tystion yn ymateb i gwestiynau gan aelodau'r Pwyllgor am yr achos busnes dros un corff amgylcheddol.

2.2 Gohiriwyd y cyfarfod o dan Reol Sefydlog 17.47 hyd nes y cafwyd datrysiad i broblem dechnegol.

3. Ymchwiliad i'r achos busnes dros un corff amgylcheddol – tystiolaeth lafar

3.1 Bu'r tyst yn ymateb i gwestiynau gan aelodau'r Pwyllgor am yr achos busnes dros un corff amgylcheddol.

4. Ymchwiliad i'r achos busnes dros un corff amgylcheddol – tystiolaeth lafar

4.1 Bu'r tyst yn ymateb i gwestiynau'r Pwyllgor am yr achos busnes dros un corff amgylcheddol.

TRAWSGRIFIAD

Gweld [trawsgrifriad o'r cyfarfod](#).

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

Further written response of West Coast Energy Ltd

1. Introduction

1.1. On 1st December 2011, Gerry Jewson, the Chairman of West Coast Energy Limited (WCE), and Stephen Salt, the Planning and Development Director of the Company, gave oral evidence to the Environment and Sustainability Committee's Inquiry into Energy Policy and Planning in Wales.

1.2. During the evidence session, the Chairman of the Committee, Lord Dafydd Elis-Thomas invited Mr Jewson to submit additional evidence to the committee to clarify and expand upon some specific points that had been raised during the evidence session. These related to the following matters:

- 1.2.1. WCE's experience of developing renewable energy projects in Scotland;
- 1.2.2. WCE's experience of working with the Countryside Council for Wales;
- 1.2.3. WCE's experience of working with the Highways Agencies in Wales.

1.3. This further written response is, therefore, submitted to the Committee to set out the views of WCE in connection with the matters referred to above.

2. Lessons to be learnt from Scotland

2.1. Leadership

2.1.1. The Scottish Government has set itself the goal of being the green powerhouse of Europe and this political ambition is one of the principal reasons why companies like WCE chose to invest in renewable energy in Scotland. One of the Scottish Government's six strategic objectives for the economy is for the transition to a low carbon economy¹ and ambitious targets have been set for the equivalent of all of Scotland's electricity needs to be met from renewables by 2020.

2.1.2. The targets in Scotland for electricity generation from renewables is challenging but the Scottish Government has published a routemap for renewable energy in Scotland² which sets out actions to the challenges which currently exist to realise this ambition. This routemap is regularly updated to monitor the achievement of the

¹ Scottish Government (2011) Economic Strategy www.scotland.gov.uk/Publications/2011/09/13091128/0

² Scottish Government (2011) 2020 Routemap for Renewable Energy in Scotland
www.scotland.gov.uk/Resource/Doc/917/0118802.pdf

targets and to address issues and barriers which stand in the way of the transition to the low carbon economy.

2.1.3. The raft of policy statements, framework documents, infrastructure plans and strategies are also regularly backed up by strong support for renewables from Scottish Ministers. For example, in a video message to the two day All-Energy Conference in Aberdeen in May 2011, the First Minister, Alex Salmond MSP, outlined the progress that had been made towards the renewable energy targets and the investments made in clean energy developments.³ More recently the First Ministers New Year message for renewables was very positive for 2012 in terms of generation and investment in Scotland.⁴

2.1.4. The political commitment to the generation of renewable energy in Scotland and particularly wind energy is also clear from the statements made on a regular basis by members of the Scottish Cabinet. For example, Richard Lochhead MSP, Cabinet Secretary for Rural Affairs and the Environment, stated in the Economic Strategy document that ‘Scotland’s primary new economic opportunity lies in the development of a low carbon economy’⁵ and commenting in the same strategy document Mike Russell MSP, Cabinet Secretary for Education and Lifelong Learning, pointed to the need to develop new skills to meet the opportunities emerging from the growing energy sector.⁶

2.1.5. It is of course appreciated that the drive for renewable energy development in Scotland has to be balanced by the protection of local amenity and the local environment and that not all such developments will be locally acceptable. There are also a range of non-planning issues associated with the transition to the low carbon economy which are regularly raised by objectors to renewable energy schemes and wind farms in particular. However, Scotland’s Energy Minister, Fergus Ewing MSP, is regularly quoted in the press defending the SNP policy on renewable energy and extolling the environmental, social and economic benefits of wind energy.^{7,8}

2.2. Reflecting Ambitions in Policy

2.2.1. Planning policy at the national level in Scotland is clear, consistent and reflects the need to increase the deployment of renewable energy schemes to assist economic development and to contribute to Scotland’s low carbon ambitions.⁹ The Strategic

³ <http://www.scotland.gov.uk/News/Releases/2011/05/18093247>

⁴ <http://www.scotland.gov.uk/news/releases/2012/01/04105057>

⁵ Scottish Government (2011) Economic Strategy, page 51

⁶ Scottish Government (2011) Economic Strategy, page 59

⁷ <http://www.power-eng.com/news/2011/12/1569439292>

⁸ <http://www.cawt.co.uk/index.php?mact=CGBlog,cntnt01,detail,ocentnt01articleid=5>

⁹ National Planning Framework 2 (NPF2) 2009 and Scottish Planning Policy (SPP) 2010

National Policy is also regularly updated to meet the new targets and to provide advice and policy to address important land use matters.

- 2.2.2. The support given to renewable energy generation in national planning policy is also backed up by the 2020 Routemap referred to earlier. The Routemap examines the environmental and technical challenges associated with planning for renewables and puts forward plans, programmes and actions in order to assist such deployment.
- 2.2.3. A key theme in the Routemap is community engagement and the involvement of the local community in development proposals. To maximise the benefits for communities from renewables, the Routemap has therefore set a target of 500MW of community owned renewable energy by 2020. During the evidence session, Stephen Salt gave examples of how the company is working in partnership with community groups in Scotland to increase the level of opportunity for the local ownership of energy and we see great opportunities for such investment in Wales if given a supportive policy base. Gerry Jewson also explained to the Committee how the company is working with communities in Scotland on some of its commercial wind farm projects to ensure that the community has a guaranteed share in the net profit from wind energy from a community turbine or from a percentage of the net profits from the overall wind farm. This community partnership model seems to be favoured in Scotland and we certainly see great potential for the development of appropriately sited schemes of this sort in Wales outside the Strategic Search Areas. However, once again, the planning policy framework does need to be clearer and more positive in this respect to enable future investment decisions to be made.
- 2.2.4. At the local level, it is accepted that the delivery of the Scottish Government's low carbon economy represents a major challenge to local planning authorities when faced with formulating local development plans and supplementary planning guidance within prescribed timeframes and with the added requirement to balance the costs and benefits of renewable energy generation within the planning process. It is accepted that there is therefore some disconnect in some local planning authorities between national and local policy and decision making.
- 2.2.5. Accountability and transparency of the planning determination process is, however, being monitored by the Scottish Government and a significant number of Scottish local planning authorities have embraced the benefits of the low carbon economy and are now actively promoting the benefits of renewable energy generation in their areas. Good examples of this are Fife Council which has a strategic objective to become the leading Green Council in Scotland.¹⁰ The Council has an interactive website which focuses on investment in Fife and on the Fife Energy Park and supply chain support etc.¹¹ The Council has also led the formation of a company called East Coast Renewables which is an alliance of local authorities from Aberdeen to East

¹⁰ Growing Fife's Future – The Renewable Energy Opportunity, May 2010

¹¹ <http://www.InvestinFiferenewables.co.uk>

Lothian which are working together to promote the east coast of Scotland as a location for investment by the renewable energy sector. It is this support and drive which has led West Coast Energy to make decisions for significant investment in project development and community renewables in areas like Aberdeenshire, Angus and Fife.

2.3. The Role of Scottish Natural Heritage

2.3.1. Scottish Natural Heritage (SNH) has a statutory duty as a Government Agency to care for the natural heritage of Scotland and one of its strategic priorities is to respond to climate change. SNH has a policy commitment to 'strongly support the development of renewable energy' and has developed an interactive website associated with the development of renewable energy¹². SNH has developed a clear policy statement on renewable energy and the natural heritage¹³ and has formulated and approved a Service Level Agreement¹⁴ which sets out the stages at which SNH expect to input into the process of developing and consulting upon renewable energy proposals and the level of advice that it will offer. As a developer in Scotland, West Coast Energy may not always like the advice that SNH provides to local planning authorities or the Scottish Government but at the very least the advice given is general provided within reasonable timescales and the case officer is, on most occasions, available for engagement so as to clarify issues when specific concerns have been raised. This Service Level Agreement runs to 19 pages and should be contrasted with the two sided Statement of Understanding issued by Renewable UK and the Countryside Council for Wales in May 2011.¹⁵ This Statement sets out how Renewable UK member companies and CCW can work in partnership to maximise the timely deployment of low carbon energy production in Wales.

2.3.2. More recently, SNH has developed and published a Service Statement for Planning and Development Proposals.¹⁶ This document sets out a new approach to many development proposals of all types, including renewable energy proposals and concentrates on:

- More selective engagement in planning consultation casework
- Increased emphasis on effective pre-application engagement
- More limited use of objections
- More proportionate requests for further information
- A more enabling solution based approach
- Timescales for responding to the consultation process

¹² <http://www.snh.gov.uk/Planning-and-development/renewableenergy>

¹³ Renewable energy and the natural heritage October 2010 <http://www.snh.gov.uk/docs/c272217.pdf>

¹⁴ Renewable Energy Consultations: A Service Level Statement March 2011
<http://www.snh.gov.uk/docs/A542778.pdf>

¹⁵ <http://www.ccw.gov.uk/ccw-and-renewable-uk-agree.aspx>

¹⁶ <http://www.snh.gov.uk/docs/A498949.pdf>

3. Countryside Council for Wales

- 3.1 At the evidence session concerns were raised about the Countryside Council for Wales (CCW) response timescales and the lack of willingness to engage in connection with the Tirgwynt project in Powys.
- 3.2 The proposed Tirgwynt wind farm is situated in Montgomeryshire, Powys between the villages of Carno and Llanfair Caereinion. The Scheme is both within the Strategic Search Area B as defined in TAN 8 and the refinement exercise undertaken by Powys Council which placed the projects firmly within their Carno Wind Farm Zone.
- 3.3 The project is a joint development with 15 local landowners and has significant local support. The scheme has a confirmed and consented grid connection to SP Manweb, and as such can be built independently of any proposed Mid Wales grid reinforcement.
- 3.4 The planning application for Tirgwynt was submitted in September 2007 and was the first large scale wind farm to be received in Powys for determination in the context of the TAN8 SSA policy.
- 3.5 The development proposed the erection of 22 turbines with a potential installed capacity of 44MW. However after prolonged discussions with Council Officers and CCW Officers with respect to perceived landscape and ecological impacts the application was formally revised in April 2010 by the deletion of 10 turbines. The application was then recommended for approval at the County Planning Committee in August 2010 and planning permission is expected to be issued shortly following the signing of a S106 legal agreement.
- 3.6 Whilst it is over 4 years since the application was first submitted to Powys Council the development partnership is pleased with the final outcome and work is now in hand to construct the 12 turbine scheme and to deliver the social, environmental and economic benefits which have long been promised.
- 3.7 However, whilst there has been a willingness to engage and bring the scheme to a conclusion from Powys planners, some statutory consultees and particularly CCW did not in our opinion engage sufficiently in the planning process for Tirgwynt and we believe this caused unnecessary delay to the determination of the planning application. For example CCW took over 4.5 months to formally respond to the consultation from Powys and considerable periods of time then elapsed between the submission of additional information to CCW and the receipt of further responses. It was not until February 2010 that a further formal response from CCW to the Tirgwynt application was received with the final formal response not being received until August 2010. This was nearly 3 years since the submission of the application to Powys Council. Unfortunately since the Committee resolution, our experience of liaison with CCW has also been frustrated by lengthy delays between the provision of information and requests for meetings etc.
- 3.8 It is fully appreciated that CCW has a key role to play in ensuring that the deployment of renewable energy generation in Wales does not impact to an unreasonable extent on important habitats, species and landscapes. However CCW also has an important role to

play in addressing climate change and in helping to meet the Welsh Governments targets for renewable energy. Based upon our experience of working with CCW on the Tirgwynt development, our view is that a more pragmatic and enabling approach is required in order for CCW to meet the challenge set by the Welsh Government to deliver the low carbon economy.

3.9 Since the 1st December 2011, representatives of WCE and CCW have been in contact to discuss the concerns raised by WCE at the Evidence Session and a meeting was held at the WCE offices in Mold on 20th January 2012. The meeting was very constructive and CCW outlined a number of actions which we both have identified which, if implemented will hopefully assist the working relationship with the renewables industry and the achievement of the Welsh Governments renewable energy targets.

4. Transport Issues

4.1 At the evidence session concerns were raised about the role of the Welsh Assembly Government Transport and Powys Highways during the determination process for the Tirgwynt Wind Farm. West Coast Energy does recognise that the impact of abnormal load and construction traffic on the highway network and users is an important planning consideration and that the concentration of wind farm developer interest in Powys has led to considerable local concern and opposition.

4.2 However in the case of Tirgwynt, the project had and continues to have a secured grid connection using the existing grid infrastructure and very importantly, the traffic generated would not be part of any cumulative impact with other potential wind farms in Powys.

4.3 The Environmental Statement which accompanied the 2007 planning application therefore dealt in a comprehensive manner with the transport issues associated with the proposed development and in our opinion provided sufficient information and mitigation solutions to deal with the identified transport impacts.

4.4 However at the request of both the Welsh Assembly Government Transport and Powys Highways, a detailed Traffic Management Plan was produced and this went through a number of revisions before being accepted by these statutory consultees. An Executive Transport Summary was also produced and the applicant was also involved in trial transport runs and detailed discussions with Transport Authorities outside Wales and with local communities along the proposed transport route.

4.5 We would again emphasize the importance of the consideration of transport issues during the planning determination process. However in our experience, the consideration of this matter by both Welsh Assembly Government Transport and Powys Highways was well in excess of the requirements of other highways agencies particularly given our experiences in Scotland. Over a period of nearly 3 years, a considerable amount of highways information was provided to the Highways Agencies and whilst the outcome was positive in terms of the final consultee responses, it is our view that this project which in the end was only for 12 turbines should not have been subject to such a rigorous inquisition particularly when this development will come forward for construction well in advance of

the perceived cumulative impacts associated with the majority of the other Mid Wales farm developments.

- 4.6 The long delays in responding to submitted information and the shifting requirements of the Agencies only added to the frustrations of the applicant. Given the importance of the need to deliver the renewable energy targets, our view is that in the case of the Tirgwynt project, the Agencies took an over cautionary position and a more enabling approach would have been more appropriate in this specific case.