



# Cyngor Cefn Gwlad Cymru Countryside Council for Wales

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The Rt Hon Lord Dafydd Elis-Thomas AM  
Chair  
Environment & Sustainability Committee  
National Assembly for Wales  
Cardiff Bay  
CARDIFF  
CF99 1NA

23 September 2011

Dear Sir

## **ENVIRONMENT & SUSTAINABILITY COMMITTEE INQUIRY: ENERGY POLICY AND PLANNING IN WALES**

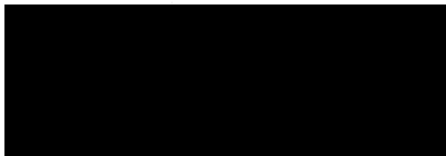
The Countryside Council for Wales champions the environment and landscapes of Wales and its coastal waters as sources of natural and cultural riches, as a foundation for economic and social activity, and as a place for leisure and learning opportunities. We aim to make the environment a valued part of everyone's life in Wales.

Thank you for giving CCW the opportunity to submit evidence to this inquiry. Our comments are made in the context of CCW's role as an advisor to Government on energy policy and planning as far as that relates to the natural heritage of Wales and as a statutory advisor to licensing authorities responsible for the development of energy in Wales.

We note that oral evidence sessions for this inquiry will take place in the autumn term and we would welcome the opportunity to give evidence and answer further questions at one of these sessions.

I hope you find these comments helpful. If you would like to discuss any of the points we have raised, please contact Keith Davies ([k.davies@ccw.gov.uk](mailto:k.davies@ccw.gov.uk)) in the first instance.

Yours sincerely



**Roger Thomas**  
**Chief Executive**



**Gofalu am natur Cymru - ar y tir ac yn y môr • Caring for our natural heritage - on land and in the sea**



# Cyngor Cefn Gwlad Cymru Countryside Council for Wales

## **NATIONAL ASSEMBLY FOR WALES ENVIRONMENT AND SUSTAINABILITY COMMITTEE INQUIRY INTO ENERGY POLICY AND PLANNING IN WALES**

### **WRITTEN EVIDENCE FROM THE COUNTRYSIDE COUNCIL FOR WALES**

The Countryside Council for Wales (CCW) welcomes the opportunity to participate in the Environment and Sustainability Committee inquiry into energy policy and planning in Wales. Our evidence sets out our role in energy policy and consenting of energy developments in Wales and focuses on the key strategic issues relating to energy policy in Wales and its relationship to UK Government Energy Policy that were set out in the Terms of Reference for the inquiry<sup>1</sup>.

#### **1. Summary**

- 1.1 CCW is the Welsh Government's statutory advisor on sustaining natural beauty, wildlife and the opportunity for outdoor enjoyment in Wales.
- 1.2 CCW encourages early engagement with developers to find positive solutions to get the right development in the right place and at a project level to identify, mitigate and resolve environmental issues.
- 1.3 Our advice focuses on the impact of a particular development or plan on interests of acknowledged importance relating to the natural heritage of Wales to ensure the decision making process is informed by the best available evidence.
- 1.4 Energy policy needs to be integrated with the needs of other activities and uses of our natural environment, integrated across land and Welsh seas, and within the policy framework that addresses these interests.
- 1.5 Further devolution of energy powers might allow some limited simplification of consenting arrangements but more importantly may help to drive better integration of strategic planning for energy that more effectively coordinates delivery of energy policy in Wales.
- 1.6 All interests (social, economic and environmental) need to be addressed irrespective of whether further energy powers are devolved or not.
- 1.7 Irrespective of the further devolution of powers to Wales, maintaining strong links with policy makers and planners across the UK is necessary to ensure that the cross border and trans boundary implications of proposals are fully understood and addressed.

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<sup>1</sup> Letter from Dafydd Elis-Thomas, Chair of the Environment and Sustainability Committee (2 August 2011).

- 1.8 It is essential that experience, best practice and information about the impacts of energy related activities is shared across the UK and wider to ensure that the evidence base for informing decisions is developed as comprehensively and efficiently as possible.
- 1.9 Adopting the approach to environmental management that is likely to be introduced by the Natural Environment Framework will be easier to implement via a single policy framework for energy in Wales.
- 1.10 CCW has, and continues, to support the principles behind a strategic and spatial planning approach for the deployment of renewable energy as expressed in TAN 8.
- 1.11 CCW believes that a clear policy and planning framework is critical to the effective delivery of energy goals whilst at the same time addressing the necessary requirements of the environment and other interests.
- 1.12 We would welcome a Welsh Government led renewable energy delivery board or forum to work constructively to facilitate the deployment of renewable energy more effectively in Wales.
- 1.13 CCW support a National Infrastructure Plan for Wales that better integrates the planning and consenting of energy projects with necessary ancillary infrastructure whilst ensuring environmental duties and obligations are met.

## **2. Introduction**

- 2.1 The Countryside Council for Wales welcomes the opportunity to participate in the Environment and Sustainability Committee inquiry into energy policy and planning in Wales.
- 2.2 CCW champions the environment and landscapes of Wales and its coastal waters as sources of natural and cultural riches, as a foundation for economic and social activity, and as a place for leisure and learning opportunities. We aim to make the environment a valued part of everyone's life in Wales.
- 2.3 CCW is the Welsh Government's statutory advisor on sustaining natural beauty, wildlife and the opportunity for outdoor enjoyment in Wales. CCW was created by the Environment Protection Act 1990 to provide advice on nature conservation, landscape and recreational matters throughout Wales and in Welsh waters.
- 2.4 We work proactively to help deliver renewable energy development and achieve low carbon energy goals whilst ensuring our duties, obligations and priorities in relation to conserving and enhancing the natural heritage and natural resources of Wales are met within the overall context of sustainable development. We give a high priority to work at a strategic level with Government, regulators and developers being clear what is important to us and why, sharing knowledge, evidence and our experiences, encouraging spatial and strategic consideration of deployment and to develop research and improving consenting procedures. The statutory nature conservation agencies (CCW, Natural England, SNH, JNCC and DOENI) also work collaboratively to ensure a joined up approach to environmental advice across the UK and in Wales we have a close relationship with other bodies in Wales (including EAW, FCW and the Local Planning Authorities) on energy issues.

2.5 We are members of and have a proactive role in a number of fora which operate at a UK level facilitating renewable energy deployment to meet UK policy targets either at a strategic spatial level or in identifying issues and barriers at a project consenting stage. These are non-statutory processes which include the Infrastructure Planning Commission (IPC) led onshore and offshore consenting forums, the Offshore Renewable Energy Licensing Group and the DECC lead Renewable energy environmental issues (REDEI) group. These groups also enable us to benefit from the wider sharing of best practice, lessons learned and research in renewable energy deployment at a UK, European or worldwide level which is of benefit to Wales.

2.6 CCW also encourages early engagement with developers to find positive solutions to get the right development in the right place and at a project level to identify, mitigate and resolve environmental issues. CCW has developed a Statement of Understanding (SoU) with RenewableUK Cymru to identify and achieve shared outcomes and provide frameworks for collaborative working with the energy sector.

2.7 We aim to provide our advice according to the Hampton principles in a reasonable, proportionate, transparent and timely way. Our internal Operational Planning Notice (OPN) guides our staff in enabling us to be proportionate and risk based. We have a number of internal mechanisms which link our work at a strategic and project level to ensure coordination and consistency in our work.

2.8 CCW's evidence to the Environment & Sustainability Committee places emphasis on the following important themes:

- The scope of energy policy and complexity of consenting arrangements.
- The importance of a policy framework to inform decisions about energy development.
- The need for a strategic approach to planning and assessing energy development.
- The importance of good evidence to inform planning and decision-making.

2.9 CCW has previously provided advice to the National Assembly for Wales Environment and Sustainability Committee inquiry into Carbon Reduction and Energy Generation in Wales in 2008<sup>2</sup> and the inquiry into Planning in Wales<sup>3</sup>. More recently we have submitted advice to the current DECC inquiry on the future of marine renewables in the UK<sup>4</sup>. Copies of CCW's submissions can be provided upon request.

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<sup>2</sup> National Assembly for Wales Sustainability Committee Inquiry into Carbon Reduction in Wales: Energy Generation Large Scale Renewable Energy Developments (13 November 2008).

<sup>3</sup> National Assembly for Wales Sustainability Committee Inquiry into Planning in Wales (September 2010).

<sup>4</sup> Energy & Climate Change Committee Inquiry: The Future of Marine Renewables in the UK (8 September 2011).

**3. Issue the Committee will consider - 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.**

*CCW's interest and role in energy*

3.1 In our capacity as statutory advisors on environmental impacts CCW's interest in energy stems from the fact that its generation, in all its forms, leads to environmental impacts. Generating energy from fossil fuels releases carbon dioxide and other greenhouse gases, contributing to climate change. Acidification, and increasingly eutrophication, as a result of fossil fuel burning remains a major concern. Renewable energy sources, while not creating such pollution, can lead to other environmental impacts. These can take the form of changes to the landscape and seascape and, depending on the technology involved, impacts on particular habitats and species.

3.2 In its position statement on Energy and Natural Heritage<sup>5</sup>, CCW sets out the need for a strategically planned approach, seeking to lower overall environmental impacts of energy generation, through and in order of importance:

- demand management measures;
- energy efficiency;
- expanding renewable energy by getting the right technology in the right place; and
- lowering pollution from fossil fuel generation.

3.3 CCW also sets out its support for initiatives which expand generation from lower carbon sources while minimising unnecessary impacts on natural heritage. To accommodate this imperative, CCW recognises that it will often be necessary to reconcile the need to accept some local impacts on our natural heritage in the short term in order to secure a lowering of emissions from energy generation, whilst ensuring that legal requirements to protect the environment are upheld.

3.4 In fulfilling its statutory duties in the context of energy generation CCW aims to provide clear, independent, evidence based and consistent advice to the Welsh and UK Governments, Local Planning Authorities, the Infrastructure Planning Commission (IPC), developers and others on the potential impact of strategic policy, plans and programmes and individual developments on the natural heritage of Wales. We are a statutory consultee under a number of Acts and Regulations in relation to casework and are a consultation body and relevant authority in relation to the Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) processes. Our advice is provided at both a project and plan/programme (strategic) level under these arrangements and focuses on the **impact** of a particular development or plan on interests of acknowledged importance relating upon natural heritage of Wales. Our aim is to ensure the decision making process is informed by the best available evidence and advice on the impact of proposals or plans on natural heritage.

3.5 There are obvious environmental issues relating to all energy developments. But these need to be put in context. Natural heritage is sometimes perceived to be the main constraint to deploying energy infrastructure, particularly onshore windfarms. In our experience the natural heritage is but one of the reasons why developments take a

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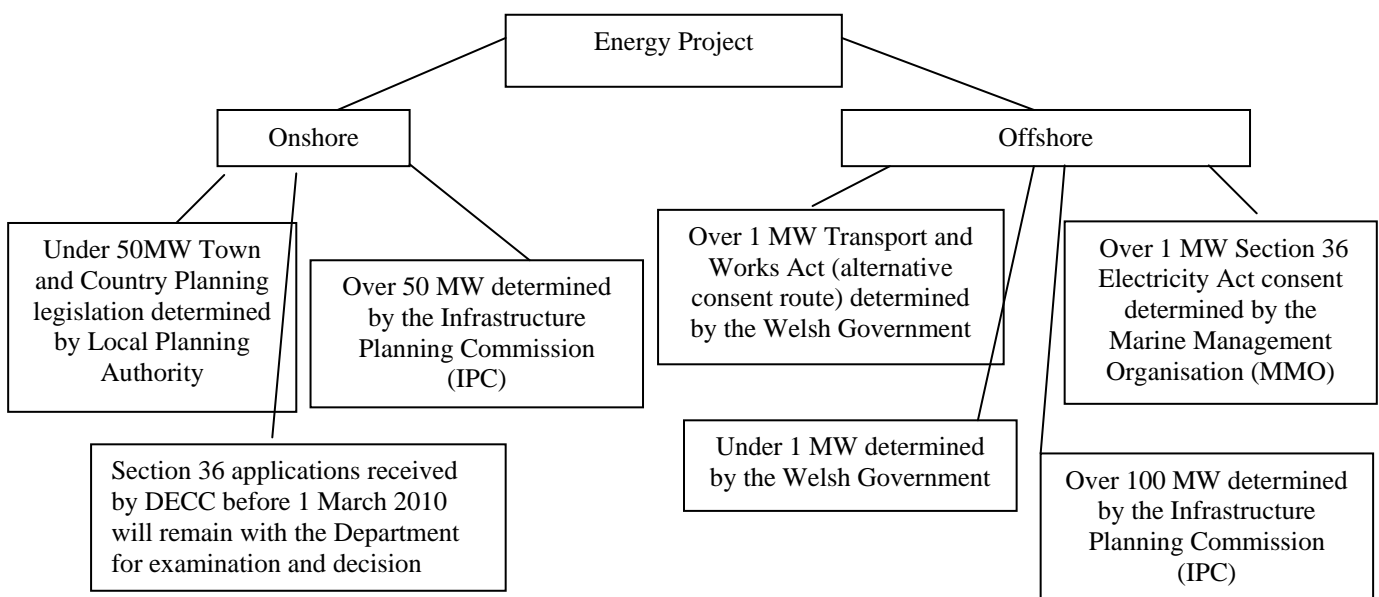
<sup>5</sup> Energy & Natural Heritage. CCW Position Statement. 2008

significant amount of time from conception to consent or fail to secure a development consent. Other reasons include strategic decisions taken to withdraw the project and focus on other locations or technologies, transport and highways issues, lack of finance or stakeholder issues.

**4 Committee question - 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?**

4.1 The scope of energy related work that CCW is involved in is considerable and ranges from established sectors deployed at a large scale to smaller innovative technologies that are experimental. This includes energy related developments both on and offshore and their associated infrastructure.

4.2 In most cases energy developments require multiple consents and in some cases there may be a number of alternative consenting routes to choose from. For example an offshore windfarm over 100MW in territorial waters could be consented by Welsh Ministers under the Transport and Works Act 1992 or by the IPC depending on the consenting route chosen by the applicant<sup>6</sup> (see Figure 1).



**Figure 1: The consenting of energy developments in Wales.**

4.3 Consenting arrangements for energy are therefore complex with different legal regimes for each energy sector and a range of legal requirements to manage the effects of development on the environment and other interests. Some aspects of consenting (eg environment and town and country planning for energy and associated infrastructure are devolved) whilst others (eg most development consents for major projects) are not. There are a number of consenting authorities and advisors (both Welsh and UK) involved in consenting energy projects, and associated infrastructure in Wales which CCW engage with and provide advice to.

<sup>6</sup> Overarching National Policy Statement for Energy (EN-1) and National Policy Statement for Renewable Energy Infrastructure (EN-3) July 2011.

4.4 The planning system has a key role to play in helping ensure the environment is enhanced and safeguarded whilst supporting economic and social objectives. CCW considers that a robust regulatory regime is critical to ensure the sustainable development of energy. Interactions between planners, regulators and advisors need to be effective and **all interests (social, economic and environmental) need to be addressed irrespective of whether further energy powers are devolved or not**. Further devolution of energy powers may allow some limited simplification of consenting arrangements but more importantly may help to drive better integration of strategic planning for energy that more effectively coordinates delivery of energy policy and related infrastructure in Wales (see section 5). The success of this would depend strongly on the adequacy of resources.

4.5 Energy development can also have significant cross-border implications, especially in the marine environment. Decisions about individual projects and planning for energy at a strategic level will often require extensive interaction with planners and regulators in other parts of the UK, irrespective of the further devolution of energy powers.

4.6 Greater coordination of policy and delivery frameworks at the Wales level would help bring policy makers, regulators, advisors and developers together and ensure a coordinated approach to the delivery of energy targets across land and Welsh seas through the integration of land and marine planning. **We would welcome a Welsh Government led renewable energy delivery board or forum to work constructively to facilitate the deployment of renewable energy more effectively in Wales**. We feel this would create a ‘Team Wales’ approach to facilitating energy deployment and allow a common understanding of policy, legislation and process tackling key issues and facilitating the delivery of policy targets together.

4.7 CCW would also support a National Infrastructure Plan for Wales that better integrates the planning and consenting of energy projects with necessary ancillary infrastructure, such as transport and grid connection, whilst ensuring environmental duties and obligations are met.

## **5 Committee question – How does this (the responsibility for consenting major energy projects remaining with the UK Government) 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?**

**5.1 Further devolution of energy powers to Wales may reduce the complexity in energy consenting, but perhaps more importantly might allow stronger integration of policy and delivery**, but again the success of this will be dependant on adequate resourcing.

5.2 The development of energy policy by a single Government administration makes the development of coordinated and effective policy more achievable. Furthermore, changes to the policy framework to adapt to changing circumstances in Wales in the future will be easier to manage if it is overseen by a single policy authority. For example, the need to adopt the approach to environmental management that is likely to be introduced by the Natural Environment Framework<sup>7</sup> will be easier to implement via a single policy framework for energy in Wales than via policy frameworks developed at the UK level.

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<sup>7</sup> The Natural Environment Framework is under development in Wales to help secure the future sustainable and integrated management of land and water by making the long term health of ecosystems and the services they

5.3 CCW is not in a position to advise on the ability of energy sectors to deliver energy generation capacity that are set out in the Welsh Government Energy Statement ‘A Low Carbon Revolution’. However, CCW believes that a clear policy and planning framework is critical to the effective delivery of energy goals whilst at the same time addressing the necessary requirements of the environment and other interests. The proposals outlined in the Welsh Government’s legislative programme for a sustainable development bill, planning bill and environment bill, the emerging Natural Environment Framework and plans associated with the implementation of the Marine and Coastal Access Act 2009 in our view provide an opportunity to implement any required changes to the current regime.

5.4 However, the capacity and expertise for delivery of energy functions (policy, management and administration) should not be underestimated. In developing a case for further devolution, care will be needed to fully scope the range of energy work undertaken to support each energy sector (ranging from small scale onshore to offshore oil and gas) to understand the full implications for WG in taking on responsibility for these areas. Any further devolution must be supported by adequate resourcing both for the decision makers but also those providing the advice and evidence and support to ensure that environmental assessment protocols and other regulatory processes are adequately resourced to meet legal requirements and support sustainable development.

**5.5 Irrespective of the further devolution of powers to Wales, maintaining strong links with policy makers and planners across the UK is necessary to ensure that the cross border and trans boundary implications of proposals are fully understood and addressed.** It is also important that experience, best practice and information about the impacts of energy related activities is shared across the UK and wider to ensure that the evidence base for informing decisions is developed as comprehensively and efficiently as possible.

## **6 Committee question – 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?**

6.1 CCW have provided advice on the UK’s National Policy Statements and advised the Welsh Government on Planning Policy Wales, Local Development Plans and other strategic policy and planning documents. Our key, and statutory, role in this regard has been to ensure that any significant effects that development may have are addressed at the policy/planning stage to minimise risks to both the environment and to projects at the point of consent.

**6.2 CCW believes that a clear policy and planning framework is critical to the effective delivery of energy goals whilst at the same time addressing the necessary requirements of the environment and other interests.**

6.3 Energy policy needs to be integrated with the needs of other activities and uses of our natural environment, and within the policy framework that addresses these interests.

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provide central to decision making. A key component of a new approach will be to adopt an ecosystem approach underpinned by a spatial approach to identifying our green infrastructure, ecosystem goods and services, and their integration with social and economic infrastructure recognising the multifunctional use of land.



6.4 Policy for energy infrastructure in the marine environment will need to be developed within the context of the UK Marine Policy Statement and planned for within the Marine Planning Framework to be implemented under the Marine & Coastal Access Act 2009. Welsh Ministers have responsibility for developing marine plans for Welsh waters. Marine Plans are now under development and Government should consider how the development of the sector should be promoted within this new system of planning.

6.5 Many areas suitable for the deployment of renewable energy technologies also support biodiversity and habitats that are of significant nature conservation importance and that are protected by legislation which requires that significant damage or disturbance is avoided. Some of these areas also have significant landscape and recreational value which may also be sensitive.

6.6 There is therefore potential for damage to natural heritage from deployment of renewable energy infrastructure. Uncertainty about some impacts and the level of precaution required by some environmental legislation, are also challenges to decision-makers. However, experience from the deployment of developments to date, particularly onshore and offshore windfarms, has shown that a spatial approach and spatial planning can help to avoid significant impacts provided it is based on strategic assessment supported by good spatial evidence and robust research.

6.7 CCW therefore believes that strategic spatial planning for renewable energy, based on rigorous evidence and assessment, is necessary to reduce both the environmental and consenting risks associated with energy development. Development of these approaches, through for example TAN 8 and the Welsh Government Marine Renewable Energy Strategic Framework, we believe has helped to manage these risks in Wales.

**7 Issue the Committee will consider - 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.**

*Technical Advice Note (TAN) 8*

7.1 CCW supported the Welsh Government in developing its strategic approach to the development of renewable energy as described in Planning Policy Wales, Technical Advice Note (TAN) 8, Planning for Renewable Energy. Our aim was then, and remains, to ensure that energy developments are located and constructed in a way that safeguards internationally and nationally acknowledged natural heritage designations. These designations are held in high regard by the Welsh Government and CCW has a statutory duty on its behalf to advise on how they can be safeguarded and promoted.

7.2 TAN 8 continues to provide a strategic national spatial process and framework for Wales to help identify positive solutions, the right type of development in the most appropriate locations, thereby helping achieve Government renewable energy targets whilst minimising impacts on the environment. We believe that the decisions to date under the current TAN 8 policy framework have led to consistent decisions, upholding the intention to concentrate development strategically in SSA's and discouraging schemes outside SSA's.

**7.3 For these reasons CCW has, and continues, to support the principles behind a strategic and spatial planning approach for the deployment of renewable energy as expressed in TAN 8.**

*UK National Policy Statements and TAN 8*

7.4 In the context of onshore windfarm development there is a clear difference, which has yet to be tested, between the spatial approach taken in Wales under TAN 8 and the criteria based UK National Policy Statements (NPS) published by DECC<sup>8</sup>. Text in the NPSs sets out UK policy against which proposals for major energy projects will be assessed and determined by the IPC in its examination of applications. In terms of the relationship with TAN 8, the NPS states that<sup>9</sup> “where a proposal is located in Wales in planning policy and advice issued by the Welsh Assembly Government relevant to renewables, will provide important information to applicants of nationally significant energy infrastructure” and that “applicants should explain in their applications to the IPC how their proposals fit with the guidance and support its targets or, alternatively, why they depart from them whether an application conforms to the guidance or the targets will not, in itself, be a reason for approving or rejecting the application”.

7.5 This situation has the potential to cause confusion for developers and presents a challenging situation for advisors like CCW. We see our role in this context as being to provide advice relating to natural heritage of Wales to ensure the decision making process is informed by the best available evidence and therefore we focus on the impacts of development proposals.

*Marine Renewable Energy Strategic Framework*

7.6 CCW would also draw the inquiry’s attention to the Marine Renewable Energy Strategic Framework (MRESF)<sup>10</sup> recently published by Welsh Government to identify the location of development opportunities alongside the potential for consenting risk as a guide to industry and policymakers. This study is an important example of the information that will be needed to support the development of the marine renewables industry, and is a useful basis upon which to promote future development in a way that allows robust consideration of the risks to the environment.

**8 Issue the Committee will consider - The potential role of other forms of energy production in Wales, eg existing fossil fuel energy generation, proposed nuclear generation and newer technologies such as coal-bed methane and shale gas.**

8.1 The delivery of energy targets has necessitated a focus on more mature technologies to meet legal delivery deadlines (eg onshore and offshore wind, nuclear). We recognise the need to promote and encourage other technologies to provide energy over longer timescales, capture extensive renewable resources or to meet particular local energy needs. The energy sector has therefore diversified considerably with the development of a range of technologies that form part of Governments desired energy mix. Technologies such as biomass, shale gas, coal bed methane (CBM), large scale solar PV arrays, wave

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<sup>8</sup> Energy National Policy Statements designated on 19th July 2011.

<sup>9</sup> National Policy Statement for Renewable Energy Infrastructure (EN-3) July 2011.

<sup>10</sup> Marine Renewable Energy Strategic Framework. Approach to Sustainable Development. Report by RPS to the Welsh Assembly Government (2011).

energy and tidal stream and tidal range are developing and, in some cases, are beginning to be deployed.

8.2 Newer technologies present different challenges and although some of the newer technologies are deployed at smaller scale as demonstrations or to provide local energy solutions, the impacts are often uncertain. The uncertainty about some impacts and the level of precaution required by some environmental legislation, present challenges to advisors and decision makers, but despite this it is possible to deploy in sensitive areas under some circumstances. However, because energy technologies are new and evolving, questions remain about the potential implications for the environment especially where deployments are at a large scale.

8.3 To better understand the environmental risks associated with new technologies CCW believes there is a need to:

- maximise and disseminate widely the learning from deployed demonstrator scale projects to help confirm or eliminate key impacts and begin to address issues associated with larger deployments;
- improve the baseline data that characterises our natural heritage resources that are most likely to be at risk from the development of newer technologies; and
- develop a strategic and coordinated programme of environmental research similar to that established for early offshore wind farm development under the Crown Estate COWRIE program.

## 9 Implications for statutory advisors

9.1 The growth of energy work has significant resource implications for those who advise Government and others about the effects of development, including CCW. Furthermore, uncertainty about impacts can also present challenges to those who advise Government and regulators about their effects at both at both strategic and project levels. Small scale renewables like small scale hydro, solar and wave and tidal stream can have disproportionate resource implications for CCW.

9.2 We think there is a capacity issue in Wales now, irrespective of the further devolution of powers to Wales. Table 1 shows the increase CCW has seen in energy related casework. These figures relate to about 700 individual development proposals which involve many different types of regulatory consent associated with energy development.

**Table 1: Number of energy related consultations received by CCW by financial year.**

Financial Year	2007/08 (5 months)	2008 / 2009	2009 / 2010	2010 / 2011	April/May 2011
No. Energy Consultations	91	302	267	475	57

9.3 We are currently engaged with 15 IPC projects. Meeting statutory deadlines in relation to individual IPC proposals, and developer expectation, is challenging. As yet CCW have not been involved in a project which has been examined by the IPC but it is anticipated

that examination process by a panel of Commissioners will require significant CCW resources.

9.4 In addition to formal statutory consultation by regulators on scoping and application stage of projects, CCW provides significant advice to developers and regulators at intervening points. Developers seek advice from CCW at face to face meetings or by correspondence to scope proposals and agree the detail of mitigation, also on the application of monitoring and mitigation conditions once consent has been issued.

9.5 Should there be further devolution of energy powers to Wales it is important to recognise that this is likely to increase, rather than reduce, the work load for advisors like CCW. We believe there would be an increase the advice which would need to be provided to Welsh Government and Local Planning Authorities but at the same time there would be a need to maintain a UK presence and our links to Europe and wider. We believe a Welsh Government led renewable energy delivery board or forum to work constructively to facilitate the deployment of renewable energy more effectively in Wales (see section 4) and adequate resourcing of the deployment of energy would help address this situation.

## **10 Conclusions**

10.1 CCW encourages early engagement with developers to find positive solutions to get the right development in the right place and at a project level to identify, mitigate and resolve environmental issues. Our advice focuses on the impact of a particular development or plan on interests of acknowledged importance relating to natural heritage of Wales to ensure the decision making process is informed by the best available evidence.

10.2 A clear policy and planning framework is critical to the effective delivery of energy goals whilst at the same time addressing the necessary requirements of the environment and other interests. Further devolution of energy powers might allow some limited simplification of consenting arrangements but more importantly may help to drive better integration of strategic planning for energy, facilitate more effectively coordination of delivery of energy policy in Wales and allow integration with the needs of other activities and uses of our natural environment across land and Welsh seas. This would also make it easier to implement the approach to environmental management that is likely to be introduced by the Natural Environment Framework.

10.3 Irrespective of the further devolution of powers to Wales, maintaining strong links with policy makers and planners across the UK and further a field is necessary to ensure that the cross border and transboundary implications of proposals are fully understood and addressed and ensure that best practice, experience and information about the impacts of energy related activities is shared to ensure that the evidence base for informing decisions is developed as comprehensively and efficiently as possible.