

WELSH GOVERNMENT
Examination Hearing
Statement

Bridgend County Council
Local Development Plan

Matter 5
Renewable Energy

8 March 2023

Matter 5: Productive and Enterprising Places – Renewable Energy

Issue: Does the Plan provide a framework for the management of renewable energy and low carbon development that is soundly based, justified and consistent with the requirements of national policy?

Please see our response to the Inspector's questions below.

1. Is the Renewable Energy Assessment robust, based on credible evidence and consistent with the requirements of national planning policy?

The Council's Renewable Energy Assessment (REA) has been informed by the Welsh Governments Planning for Renewable and Low Carbon Energy Toolkit and work undertaken previously by the Council under the Smart Systems and Heat Programme.

The REA recommends the identification of 3 Local Search Areas (LSAs) for wind and solar development. However, it is unclear on the contribution that each of these areas will have over the plan period towards meeting the targets set out in Table 10 of Policy SP13. This is essential to aid effective monitoring of the policy and comply with the requirements in Planning Policy Wales (PPW) (Edition 11) to identify measurable targets expressed as an absolute energy installed capacity figure (5.9.5).

Appendix 2 of the REA identifies clusters which make-up the LSAs that could exceed 10MW, which is the LPA decision making threshold and comes under Developments of National Significance (DNS) determined by Welsh Ministers. If this were to be the case, the LSAs may be retained within the plan but Policy SP13 would need to be amended to make clear that Policies 17 and 18 of Future Wales: the National Plan 2040 apply to DNS above 10MW+ and that these developments are acceptable within or outside the LSAs. This hierarchical approach should be conveyed in Policy SP13 and the reasoned justification (see also answer to Question 3(c) specifically regarding LSA 8).

2. Does the Plan provide an appropriate balance between realising the area's potential for renewable energy production and the protection of the landscape, natural and historic environment of Bridgend?

This is for the authority to respond.

3. Does the Policy SP13 provide an appropriate policy framework for realising Bridgend's potential for renewable energy generation?

This is for the authority to respond.

a) Is the policy consistent with the requirements of national planning policy?

The Welsh Government has the following comments on Policy SP13:

- Tables 10 and 11 in the reasoned justification identify targets for renewable energy, specifically wind, solar and heat. It would be beneficial if the plan could explain these targets should not be seen as maximum limits but a tool to maximise the available resource, in accordance with paragraph 5.9.6 of PPW, and
- To assist in the implementation of Policy SP13 the authority may also wish to consider including in the criteria issues associated with facilitating grid connection and the capacity and effects on the transportation network.

b) Are the defined local search areas for wind and solar robust? and should they be annotated on the proposals map?

The spatial extent of the LSAs in Policy SP13 should be clearly annotated on the proposals map, if they are minded to be retained by the Council.

c) Should defined local search area for wind be amended to take account of the pre-assessed areas for wind energy contained in Future Wales: The National Development Plan?

Pre-assessed Wind Area 9, as identified in Policy 17 of Future Wales: The National Plan 2040 has already concluded that landscape considerations for large scale wind can be addressed and are acceptable. It should be made clear in Policy SP13 that development of LSA 8 should not either prejudice the ability for large scale wind developments to come forward in the Pre-assessed Area and reiterate that landscape considerations have already been taken into account in Future Wales and that Policy SP13 Criteria 1(b) should not apply to those parts/or total of LSA 8 within Area 9.

d) Are the requirements of Policy SP13(b) and paragraph 5.4.85 appropriate for the consideration of wind energy development of less than 10 MW? and how will the approach work when considered in conjunction with Policies SP17 and DPN4?

See response to question 3(c) above. This is for the authority to respond.

4. Should the pre-assessed areas for wind energy contained in Future Wales: The National Development Plan be annotated on the proposals map?

The Pre-assessed Areas for Wind Energy in Future Wales: the National Plan 2040 should not be annotated on the proposals map as these areas are already defined spatially in the upper tier development plan. It maybe useful to cross-reference to the Wind Energy and Heat Networks Map in Future Wales, which sets out the boundary of the Pre-assessed Areas.

5. Is the target for energy generation contained in Table 10 – Targets for Area-Based Resource Use appropriate or should it be more ambitious?

This is for the authority to respond.

6. Are Policies ENT10 and 11 necessary? and do they provide an appropriate mechanism for securing low carbon heating technologies for new development and energy efficient design?

Bridgend has been identified as a Priority Area for a District Heat Network in Future Wales: the National Plan 2040 and as such, the authority should explore and identify opportunities for heat networks in as many locations as possible, both above and/or below the thresholds set out in Future Wales. The Welsh Government does not object to Policy ENT10.

Policy ENT11 provides detail for Energy Masterplans, adding clarity. Retention of ENT11 adds value to the plan assisting the delivery of national policy.

a) Have the requirements of the policies been superseded by amendments to Part L of the Building Regulations?

The policies are considered to provide an alternative to that set by the minimum requirements in Building Regulations. The Regulations do not supersede the policies, which are considered to support the decarbonisation agenda.

The Building Regulations are, in general, technology and fuel neutral and do not prescribe or prohibit any particular form of heating or energy generation. This is to provide flexibility in meeting energy targets and not act as a barrier to innovation. By raising the energy targets through Building Regulations introduced in 2022/2023 there is likely to be an increasing role for low carbon and renewable energy technologies as set out in the policies.

b) Should 'Major Development' be defined in the policies reasoned justifications?

Policy 16, Future Wales, defines large-scale development. If the definition of 'Major Development' in Policy ENT10 of the emerging LDP aligns with Future Wales, a cross reference may be appropriate. If the definition is different, this should be specified in the reasoned justification to Policy ENT10.

It should be noted that heat networks can be established on developments below the thresholds set out in Future Wales: the National Plan 2040 (100+ dwellings or 10,000sqm+ commercial floorspace).

c) Is the requirement for energy masterplans to be provided by all major development based on robust and credible evidence? and what impact would this threshold have on the viability of new development?

Bridgend is identified as a District Heat Network Priority Area in Future Wales. Policy 16 in Future Wales: the National Plan 2040 already states large scale mixed-use development (in line with the thresholds specified) should prepare an Energy Masterplan to establish whether a heat network is the most effective energy supply option and, for feasible projects, a plan for its implementation. Future Wales is a statutory part of the development plan applicable to Bridgend.