



Our ref ATISN 24789

Llywodraeth Cymru
Welsh Government

11/07/2025

Dear ,

ATISN 24789

Thank you for your request which was received by the Welsh Government on the 9th June. You asked:

Under TAN8, the area covered by DNS 3276725 was not included in the SSAs. After revocation and replacement with the prescriptions of Future Wales, the area was extended so that Mynydd Mynyllod was included as an SSA [Referred to as a Pre-Assessed Area (PAA) in Future Wales].

I am requesting records of that process eg minutes, site visits or other evaluation criteria, dates etc.

Our response

Our response to the information you requested is as follows: -

We have not identified specific correspondence in relation to Priority Area 14, however, Priority Area 14 (later referred to as Pre-Assessed Area (PAA) 9 and 10) is discussed in the Arup research described below, in the Integrated Sustainability Assessment and Habits Regulations Assessment, and in the National Development Framework public consultation exercise and summary report.

These documents explain the process by which Priority Areas, and later Pre-Assessed Areas, were determined and how they differ from TAN 8 Strategic Search Areas (SSAs). Please see details below.

Background and methodology for identifying Priority Areas and Pre-Assessed Areas

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Ove Arup and Partners Ltd were commissioned by the Welsh Government in 2018 to undertake an assessment of large scale (10MW+) onshore wind and solar energy development constraints and opportunities in Wales. The objective of the study was to assist Welsh Government in identifying the most appropriate locations for large onshore wind and solar energy development to inform the preparation of the National Development Framework (NDF) later renamed Future Wales. Arup produced a two-part report - [‘Assessment of onshore wind and solar energy potential in Wales’](#) – which was published on the Welsh Government website in August 2019. The methodology used to identify Priority Areas is set out in detail in this report.

Stage 1 and 2 reports

Stage 1 of the report established the methodology for area assessment. This included defining constraints and opportunities, development and analysis of options, initial identification of Priority Areas (later referred to as PAAs) for wind and solar refinement, and development and analysis of policy options. The criteria used by Arup were established in partnership with stakeholders (see report), for example, Natural Resources Wales (NRW). An important element of the area assessment was reference to NRW’s [LANDMAP](#). LANDMAP is a nationally consistent, spatial landscape resource developed by NRW to support sustainable decision-making in planning, policy, and land management across Wales. It is widely used in Landscape and Visual Impact Assessments, development planning, and environmental assessments.

Stage 2 of the report conducted further analysis to refine the Priority Areas and considered in more detail certain constraints, namely:

- Landscape and visual assessment
- Centres of population
- Vehicular access
- Ecosystem services and resilience
- Historic environment.

Stage 2 Table 5 sets out a rationale for revisions to Priority Areas for wind and solar (at that time) including Priority Area 14 (later to become Pre-Assessed Area 9 and 10). Appendix I1 summarises an Arup workshop with Welsh Government and NRW, 12th April 2019, which references discussion on Priority Area 14.

Comparison with TAN 8 SSAs

Arup compared its findings with TAN 8 SSAs before finalising its Priority Areas. TAN 8 was developed by considering both constraints and opportunities within different areas. In the stakeholder consultation during Stage 1 of the Arup project, it was agreed that Priority Areas should not be constrained by technical considerations such as wind speed and land topography because this did not allow developers the flexibility to adapt as technology changes over time. However, to provide an element of continuity of policy position from TAN8, it was proposed that the Priority Areas for refinement be extended to include SSAs, where constraints were no greater than those included in the Priority Areas. This did not, however, restrict the inclusion of areas beyond SSA boundaries where the constraints methodology of Arup’s study was employed.

Identification of Priority Areas

The study identified 15 refined Priority Areas for solar and wind energy (see Stage 2). The process did not seek to identify development sites, rather, it utilised known constraints in order to identify broad areas considered to be of greatest opportunity. The analysis and

assessment were carried out at a level appropriate to national decision-making and policy formulation. In the Arup report map outputs were not intended to present site-level accuracy and were designed to be viewed at a scale of no more than 1:250,000. In the final iteration of Future Wales, PAAs are mapped at a scale of greater than 1:100000 and are not intended to designate precise boundaries. The best place to view PAAs is [DatamapWales](#), where boundaries can be seen in the context of local geographical features. Due to the strategic nature of the exercise much of Arup's analytical work to identify Priority Areas was conducted at a desk top study level, using the datasets and maps set out in the report, and through consultation with expert stakeholders such as Natural Resources Wales.

It was accepted that matters at a local and site-specific level, would need to be considered in more detail as sites come forward through the planning process as Developments of National Significance. The Priority Areas were intended to provide an appropriate evidential position to inform decision-making at planning application stage.

Further Priority Area refinement and the preparation of Future Wales policy 17 and 18

Following the publication of the Stage 1 and 2 reports their outcomes and recommendations were used to inform further work on Future Wales Policy 17 and 18. This resulted in the removal of the solar element of Priority Areas, further refinement of the Priority Areas for wind and the renaming of Priority Area's to Pre-Assessed Areas (the purpose of a PAA is set out in Policy 17).

It should be noted that whilst a PAA gives a presumption in favour of large-scale wind, subject to the criteria set out in Policy 18, it does not preclude developers from applying to build outside these areas as long as they are not located in a National Park or Area of Outstanding Natural Beauty. However, development's outside PAAs are required to submit additional evidence that there is no unacceptable impact on surrounding landscape.

Stakeholder Engagement and Consultation

Arup Report

Arup consulted specific stakeholders including those with specialist knowledge to support this research such as Natural Resources Wales. Outcomes of stakeholder engagement are integrated and summarised in the Arup report, (see also Stage 2 Appendix I).

Engagement events

Wider engagement and consultation with the public and other interested parties took place as policies (on all planning topics) were being developed by the Welsh Government during the preparation of the NDF/Future Wales. The development of Future Wales policies 17 and 18, which provide a policy framework to assess large scale renewable energy proposals, were part of the extensive overall consultation and engagement process.

The Future Wales engagement and consultation processes and events are publicly available on the Welsh Government's Future Wales web pages under [Engagement](#).

NDF/Future Wales Consultation

Links to the 2017 and 2019 consultations are below.

[National Development Framework for Wales | GOV.WALES](#) (2017)

[Draft National Development Framework | GOV.WALES](#) (2019)

The consultation summary report - [Consultation Report - Draft National Development Framework](#) (September 2020)' - includes summaries of consultation comments on Priority Areas/Pre-Assessed Areas and is available under the 2019 link above. Individual consultation responses (to the Draft National Development Framework 2017 and 2019 are available to view under respondent type under the above links. Some of these responses will have commented on the topic of renewable energy and Priority Area policies (prior to them becoming Pre-Assessed Areas). Responses fed into the NDF/Future Wales preparation process.

Integrated Sustainability Appraisal and Habitats Regulations Appraisal

All Future Wales policies, including renewable energy policies 17 and 18, were subject to [Integrated Sustainability Appraisal](#) (ISA) (Arcadis, January 2021) and [Habitats Regulations Appraisal](#) (HRA) (Arcadis). Both the ISA and HRA can be searched for the terms Priority Areas and Pre-Assessed Areas. Both reports were subject to public consultation.

The ISA includes comments from stakeholders on all NDF/Future Wales policies.

HRA Table B includes an assessment of Priority Area 14, and the changes that were made to the boundaries of the area from Priority Area refinement to renaming as Pre-Assessed Areas 9 and 10.

Final PAA boundary changes

The final Pre-Assessed Area's as set out in Future Wales were wind only and omitted solar, and were amended as follows:

- Area 1: Deleted in its entirety due to MOD constraints.
- Area 2: Deleted as it is a solar-only area.
- Area 3: Solar area deleted.
- Area 4: Deleted as it is a solar-only area.
- Area 5: Affected by low flying zone.
- Area 6: Affected by low flying zone.
- Area 7: Not affected.
- Area 8: Deleted in its entirety due to MOD constraints.
- Area 9: Affected by low flying zone.
- Area 10: Solar area deleted, and western boundary amended to exclude MOD constraint.
- Area 11: Western boundary amended to take into account bat migration route.
- Area 12: Deleted as it is a solar-only area.
- Area 13: Deleted as it is a solar-only area.
- Area 14: Solar area deleted, and new southern boundary amended by MOD constraint.
- Area 15: Solar area deleted.

Following the amendments described above, the areas were renumbered as follows:

- Priority Area (PA) 3 is now Pre-Assessed Area (PAA) 1.
- PA 15 is now PAA 2.
- PA 5 is now PAA 3.
- PA 6 is now PAA 4.
- PA 7 is now PAA 5.
- PA 9 is now PAA 6.
- PA 10 is now PAA 7.
- PA 11 is now PAA 8.
- PA 14 is now PAA 9 and 10.

Next steps

If you are dissatisfied with the Welsh Government's handling of your request, you can ask for an internal review within 40 working days of the date of this response. Requests for an internal review should be addressed to the Welsh Government's Freedom of Information Officer at: Information Rights Unit, Welsh Government, Cathays Park, Cardiff, CF10 3NQ or Email: Freedomofinformation@gov.wales

Please remember to quote the ATISN reference number above.

You also have the right to complain to the Information Commissioner. The Information Commissioner can be contacted at:

Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF

However, please note that the Commissioner will not normally investigate a complaint until it has been through our own internal review process.

Yours sincerely