

1st May 2026

Dear

ATISN 26853 – Renewable Energy Impacts and Peat

Information requested

Thank you for your request which I received on 1st April 2026 . You asked for information relating to the impact of renewable energy development on peat soils in Wales, particularly in the context of ensuring that climate objectives and public funds are aligned with the protection and sustainable management of peat resources, which are among the most significant stores of soil carbon.

In particular copies of, or links to, the following information:

- reports, minutes of meetings, internal briefings, or correspondence (including with developers, consultants, regulators, or advisory bodies) concerning the known or potential impacts of:
 - * Existing renewable energy developments
 - * Planned renewable energy developments
 - * Anticipated future renewable energy developments on peat soils in Wales.
- Documents that assess, summarise, or evaluate:
 - * The scale or significance of peat disturbance associated with renewable energy schemes
 - * Carbon accounting or greenhouse gas implications of peat disturbance
 - * Risks to peat integrity, hydrology, or ecosystem function
- Internal or external guidance, policy documents, or decision records that outline how peat impacts are considered in planning, consenting, or funding decisions relating to renewable energy projects.
- Reports, modelling, projections, or impact assessments relating to:
 - * The National Peatland Action Programme
 - * Any other peatland restoration schemes initiated or supported by the Welsh Government
 - * Any assessment of how such programmes interact with, or are affected by, renewable energy development.
- Forward-looking assessments, scenario analyses, or projections regarding:
 - * The cumulative impact of renewable energy development on peat soils
 - * The long-term condition of peat resources in Wales under current or anticipated policy frameworks

Our response

A copy of the information I have decided to release is enclosed.

I have decided that **some of the information** is exempt from disclosure under sections 12(4)(d) and 12(4)(e) of the Environmental Information Regulations and is therefore withheld. The reasons for applying these exceptions are set out in full at Annex A to this letter.

The information to be withheld is:

- Items 4, 11, and 12 identified in FOI Release ATISN 23303 (Impact of Renewable Energy on Peat Resource – 21 February 2025) – as these still relate to information in the course of completion.
- Ministerial Advice in 2026 relating to a draft Peat Guidance Note to clarify Chapter 6 of Planning Policy Wales
- Internal emails between Welsh Government officials regarding the development of the Peat Guidance Note as this would involve the disclosure of internal communications relating to policy under development.

Information relevant to your request is provided via weblinks below, and our response is as follows:

ITEM 1 - [FOI release 23303: Peatlands | GOV.WALES](#) – provides 15 documents relating to briefings, minutes of meetings, reports and working spreadsheets, figures and notes compiled by officials relating to assessments of peat resources relative to known current, planned or future renewable energy schemes and the National Peatland Action Programme.

ITEM 2 - [FOI release 25018: Clocaenog Windfarm | GOV.WALES](#) – Provides further documentation in support of a briefing note disclosed under FOI release 23303.

ITEM 3- [Planning Policy Wales - Edition 12](#) (Chapter 6)

ITEM 4 - [Future Wales: The National Plan 2040 | GOV.WALES](#) (Policies 9, 17, & 18)

ITEM 5 - Information in relation to information submitted in support of, and the decisions taken on, applications for renewable energy projects can be found here - [Search for a case - Planning Casework](#)

ITEM 6 – Ministerial Advice (2026) relating to draft Peat Guidance Note to clarify Chapter 6 of Planning Policy Wales - withheld under EIR Regulation 12(4)(d).

ITEM 7 – Email exchanges between Planning Policy Officials and Soil Unit Officials regarding the development of a draft Peat Guidance Note – withheld under EIR Regulation 12(4)(e)

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: Freedom.ofinformation@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

Application of exemptions/exceptions

The Freedom of information Act/Environmental Information Regulations provide a right for anyone to ask a public authority to make requested information available to the wider public. As the release of requested information is to the world, not just the requester, public authorities need to consider the effects of making the information freely available to everybody. Any personal interest the requester has for accessing the information cannot override those wider considerations.

I have decided to withhold the following information:

Item 1: FOI Release 23303 – Having reviewed these documents to account for any change of circumstances since 21st February 2025 I have concluded that:

- Earlier briefing to Special Advisor. This information remains withheld on the basis of an exception under EIR 12(4)(d) Information in the course of completion.
- Email sent by an official to PEDW. This information remains withheld on the basis of an exception under EIR 12(4)(d) – Information in the course of completion.
- Ministerial advice for decision, dated 4 October 2024, which the Cabinet Secretary for Economy, Energy and Planning has not taken a decision. This information remains withheld on the basis of an exception under EIR 12(4)(d) – Information in the course of completion.

Item 6: Ministerial Advice dated 27 February 2026 relating to draft Peat Guidance Note to clarify Chapter 6 of Planning Policy Wales - withheld under EIR Regulation 12(4)(d) – information in the course of completion.

Item 7: Email exchanges between Planning Policy Officials and Soil Unit Officials regarding the development of a draft Peat Guidance Note – withheld under EIR Regulation 12(4)(e) - the request involves the disclosure of internal communications.

Public Interest Test

This Annex sets out the reasons for the engagement of section 12(4)(d) and 12(4)(e) of the Environmental Information Regulations and our subsequent consideration of the Public Interest Test.

Application of exception 12(4)(d) (Information in the course of completion) of the Environmental Information Regulations

12.—(4) For the purposes of paragraph (1)(a), a public authority may refuse to disclose information to the extent that— (d) the request relates to material which is still in the course of completion, to unfinished documents or to incomplete data.

Guidance from the Information Commissioner has confirmed that “Material which is still in the course of completion can include information created as part of the process of formulating and developing policy, where the process is not complete; draft documents are unfinished even if the final version has been produced; data that is being used or relied on at the time of the request is not incomplete, even if it may be modified later”.

I can confirm that the information captured by your request under items 1 (4,11,12) and 6 meet this description.

Application of exception 12(4)(e) (the request involves the disclosure of internal communications) of the Environmental Regulations

12.—(4) For the purposes of paragraph (1)(a), a public authority may refuse to disclose information to the extent that—(e) the request involves the disclosure of internal communications.

12(8) - For the purposes of paragraph (4)(e), internal communications includes communications between government departments.

Regulation 12(4)(d) and (e) are a qualified (public interest tested) exception.

Even if the exception is engaged, public authorities must go on to apply the public interest test set out in regulation 12(1)(b). A public authority can only withhold the information if the public interest in maintaining the exception outweighs the public interest in disclosing the information.

Because of this, consideration has been given to the effects of disclosure to the world at large rather than any personal interest you may have in being provided with the information.

Public Interest Test

In order to satisfy the public interest test in relation to the exception, it is necessary to conclude that the public interest arguments in favour of withholding the information are sufficient to outweigh the public interest arguments in favour of release.

Public interest arguments in favour of disclosure

Welsh Government recognises the strong public interest in the openness and transparency of Government. The matter is clearly of public interest, an

understanding the context of advice and the background to decision making all enhances this transparency and informs public debate.

Public interest arguments in favour of withholding

As decisions have not been made on updating policy and guidance, and the briefing contains information and analysis that is in a state of flux and is subject to change, disclosure of the information at this time would place information that is provisional and likely to be incorrect into the public domain. This information would not enhance the public debate, as information that is accurate is being released in response to this request, and the public debate is informed. Rather, it would distract understanding of the matter and detract from the debate by presenting information that is in flux as though it were final. Ministers have requested further work in undertaken, and it is necessary to protect the safe space in which this provisional policy information may be formulated. Disclosure of the provisional information would inhibit the ability of Ministers to make impartial decisions and prevent the proper functioning of government.

Balance of public interest test

The public interest in disclosure is a strong one, and the public interest is finely balanced in this case between a duty to transparency and accountability and a need to avoid damage to a process that itself promotes transparency and accountability. In my consideration, I have taken account of the fact that we are releasing information that does provide factual detail and policy analysis, and other related materials.

Furthermore, when the policy process is complete, the public interest in maintaining the exception will fall, and so this remains a time limited exception. Therefore the duty to transparency can be met by the disclosure of other materials in this request, as well as the disclosure of further guidance relating to policy, at a later date. In view of this, I take the view that the balance of public interest favours withholding this information at this time.