

Submission of Evidence Form – National Development Framework

Name

Innogy Renewables UK Ltd

Contact details

Eleri Davies
Innogy Renewables UK Ltd
Baglan Bay Innovation Centre
Central Avenue
Baglan Energy Park
Port Talbot
SA12 7AX

Date

7 March 2017

Title of evidence

Welsh, UK, European and/or Global Climate Change and Renewable Energy Targets

Summary of evidence

National Assembly for Wales, Environment and Sustainability Committee: A Smarter Energy Future for Wales (March 2016)¹: sets out what Wales must do to limit future climate change by radically reducing the amount of carbon released into the atmosphere and the opportunities this presents in terms of significantly enhancing the well-being of current and future generations.

Lesley Griffiths AM: Statement on Energy (6 December 2016)²: sets out the steps the Welsh Government will take to reduce the amount of energy used in Wales and move from its traditional association with fossil fuels to a nation renowned for its clean energy.

Paris climate conference (COP21) (December 2015): 195 countries adopted the first-ever universal, legally binding global climate deal. The agreement sets out a global action plan to put the world on track to avoid dangerous climate change by limiting global warming to well below 2°C above pre-industrial levels.

EU Directive 2009/28/EC: mandatory national targets consistent with a 20% share of energy from renewable sources by 2020. The UK target for its share of energy from renewable sources is 15% by 2020.

European Commission 'A 2030 Framework for Climate and Energy Policies' (January 2014): target of a 40% emissions reduction below the

¹ <http://www.assembly.wales/laid%20documents/cr-ld10610/cr-ld10610-e.pdf>

² <http://gov.wales/newsroom/environmentandcountryside/2016/161206-environment-secretary-sets-out-ambitions-for-wales-to-become-nation-renowned-for-clean-energy/?lang=en>

1990 level. EU-wide binding target for renewable energy of at least 27% of energy consumption by 2030.

Climate Change Act 2008: legally binding targets for the UK to reduce carbon dioxide emissions by at least 80% by 2050 relative to 1990 levels.

Summary of key issues/conclusions

- Ensuring Wales secures transformational benefits from major energy projects
- Set ambitious and realistic targets for renewables

Why have you submitted this evidence?

To ensure that renewable energy and associated infrastructure is given the appropriate level of consideration in the development of the NDF.

How should this evidence inform the development of the NDF?

The NDF should spatially map out renewable energy projects and associated infrastructure (e.g. grid, transport) in order to provide a policy framework for decision-making at the national level. The NDF needs to be strategic and set the context for national decisions to be made at an early stage. The NDF should inform long-term investment and identify the strategic development consequences of major infrastructure (i.e. new, or upgrades to existing, grid infrastructure to support new energy generating stations). The NDF should provide the context for integrating major investment decisions and inform strategic and local planning across Wales.

How does this evidence and any actions it recommends help achieve the 7 well-being goals?

The delivery of renewable energy projects will contribute towards the following well-being goals:

- A prosperous Wales (innovative, productive, low carbon society, climate change)
- A resilient Wales (biodiversity, ecosystems, climate change)
- A globally responsive Wales (positive contribution to global well-being)

Why is the evidence of national significance?

In line with the hierarchy introduced by the Planning (Wales) Act 2015, electricity generating projects with an installed capacity greater than 10MW are defined as 'developments of national significance'.

Do you agree for your evidence to be made public? (Only evidence that can be made public will inform the development of the NDF)

Yes

Submission of Projects Form – National Development Framework

Name

Review/update of Technical Advice Note 8: Planning for Renewable Energy (July 2005) (TAN8)³ to include a review of the Strategic Search Areas (SSAs).

Contact details

N/A

Date

N/A

Interest in site

N/A

Details of landowner

N/A

Title of project

Review/update of TAN8 to include a review of SSAs

Summary of project

The process of spatially mapping out electricity generating projects and associated infrastructure for the purposes of the NDF will require a review/update of the Strategic Search Areas set out in TAN8. Since the publication of TAN8, a number of wind farms have been consented and/or constructed within and outside SSAs whilst developments within other SSAs have not been progressed.

The review of SSAs should be carried out as part of the more substantive consultation on the draft NDF, in due course, adopting the following principles:

- safeguard existing operational and consented sites within and outside existing SSAs, allowing for extensions, repowering and life extensions where opportunities exist;
- safeguard sites within existing SSAs and already in the planning process;
- review progress against targets and, where necessary, identify further SSAs where required; and
- factor in technological advances since TAN8 was adopted (turbine height/capacity, opportunities for electricity storage).

³ <http://gov.wales/topics/planning/policy/tans/tan8/?lang=en>

Location of project (Please attach location map)

N/A

What consents are required?

Consents under the Town and Country Planning Act 1990 (as amended) or the Planning (Wales) Act 2015, as appropriate.

Consents already granted relevant to project

N/A

Public engagement to date

N/A

Has an environmental assessment been prepared? (Yes / No)

N/A

Are there any site designations or constraints affecting the site?

N/A

What is the delivery timescale for the project?

N/A

How would the project contribute to the delivery of the 7 well-being goals?

The delivery of renewable energy projects will contribute towards the following well-being goals:

- A prosperous Wales (innovative, productive, low carbon society, climate change)
- A resilient Wales (biodiversity, ecosystems, climate change)
- A globally responsive Wales (positive contribution to global well-being)

Why is the project of national significance?

In line with the hierarchy introduced by the Planning (Wales) Act 2015, electricity generating projects with an installed capacity greater than 10MW are defined as 'developments of national significance'.

Do you agree for your project and any supporting information to be made public? (Only projects and information that can be made public will inform the development of the NDF)

Yes

Planning Policy Branch
Planning Directorate
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

Department: Onshore Wind

Date: 7 March 2017

By email only to: [REDACTED]

Dear Sirs,

Response to National Development Framework for Wales: Call for Evidence and Projects (December 2016)

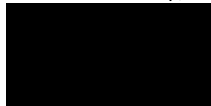
This response is made on behalf of Innogy Renewables UK Ltd (innogy) which develops, owns and operates a portfolio of onshore wind, offshore wind and hydro-power generating stations across the UK.

Overview

Thank you for the opportunity to the respond to the call for evidence and projects to inform the National Development Framework (NDF) for Wales. The NDF will have a significant bearing on the development activities of innogy in Wales and we welcome the opportunity to comment on these proposals. innogy suggests that the Welsh Government takes advantage of this opportunity to review and update Technical Advice Note 8: Planning for Renewable Energy (July 2005), including the Strategic Search Areas (SSAs).

innogy's responses to the specific call for evidence questions are attached. Please do not hesitate to contact me if you require any further information.

Yours sincerely,



Eleri Davies
Planning Specialist
Innogy Renewables UK Ltd