

Amegni Renewables Ltd

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NDF Team,
Planning Policy Branch,
Welsh Government,
Cathays Park,
Cardiff
CF10 3NQ

29th October 2019

Dear Sir / Madam

Re. Consultation on the Draft National Development Framework – Response to Policy Objectives for large scale Onshore Wind & Solar

Background

Amegni is a local onshore Wind and Solar developer based in Carno, mid Wales. We are a locally owned company involved in the development and operation of mainly local windfarms with the intention of maintaining long term ownership in order to keep the benefits in the local area. An example of our work is the Carno 2 Windfarm, a 15.6MW project developed and constructed by Amegni in 2009 which remains 100% locally owned by farmers from Carno. We have since secured planning permission for Carno 3 Windfarm, which when built will have an installed capacity of 45MW. Again, our intention is to maintain local ownership of this project for the long term.

Our focus is mainly to concentrate on development in the Carno area where we have an established foothold. Our aspirations of developing large scale onshore wind and solar, and maintaining local ownership is very much in line with that of Welsh Government. We believe this approach maximises benefits for the Welsh economy and the local areas to these developments. Just recently, funds from local windfarms in Carno were used to pay for 50% of a new primary school at Carno in partnership with the Welsh Government, bringing tangible long-term benefits to the community at large.

Consultation

We very much welcome the publishing of the Draft NDF and are encouraged by the Welsh Government's aspirations and ambition to increase renewable energy generation in Wales. We believe the targets set out within the draft are very much achievable and look forward to working with the Welsh Government in delivering these whilst maximising local ownership.

We have looked at the Draft NDF in detail and have a few observations to make which mainly relate to Policies surrounding large scale onshore wind and solar, and the Priority Areas presented in the draft document. We have summarised these in a general nature below for consideration as part of the consultation.

General Observations relating to Draft policies for large scale Onshore Wind & Solar

1. We note from the draft NDF documentation there is no mention of encouraging existing windfarms to be “Extended” or “Repowered”. As the NDF will be guidance for the next 20 years, during this time the majority of existing windfarms will come to the end of their operational life and will require repowering if renewable energy is to continue to be generated at these sites. The existing sites generally have all the infrastructure in place, especially access and grid, and have stood the test of planning, with pretty much all having the support of their local communities. They therefore present a huge opportunity to help deliver on the targets. We suggest that there should be a “Presumption in favour of Extending or Repowering existing sites” noted as policy in the final document even if they sit outside the Priority Areas.
2. From our experience there is huge opportunity in co-locating solar and wind at the same sites. It can often be the case that both technologies complement each other so well that there is no need for additional new grid capacity. Our own extensive research at Carno suggest that by co-locating large scale wind and solar and using the same grid connection, one of the technologies would only need to be curtailed up to 4% of the time. Coupled with Battery storage technology, there may be no need to curtail generation at all. As drafted, the NDF restricts the opportunity to co-locate large scale wind and solar on ‘existing windfarms’ if they are located outside the Priority Areas. Again, consideration should be given to the “Presumption in favour of co-locating technologies” on existing sites even if they are outside Priority Areas if grid infrastructure allows.
3. We are concerned with the approach used to determine some of the Priority Areas. Whilst we agree with the use of constraint mapping to identifying the most suitable places for developments, having hard defining lines for the edge of Priority Areas can be counterproductive. Very often, high level planning tools used to direct developments to certain areas can be too general and often overlook certain constraints which make such areas unsuitable, or will exclude suitable areas on the basis of broad-brush, rather than site specific, constraints data.

A good example of this is the southern part of ‘Priority Area 5’, where the area excludes land to the southwest of Carno Windfarm (Ref. Red area in Fig 1), which in our opinion from extensive development work and on-site surveys in this area is the most suitable place in the southern part of area 5 for further large scale development, but then includes a large area further south towards the communities of Trefeglwys and Llandinam (Ref. Yellow area in Fig 1), which is unsuitable for large scale development due to the density and scattering of dwellings there.

We would therefore suggest building in some flexibility around the boundaries of Priority Areas. The guidance should be clearer around the priorities given for developments that could potentially fall on the edge of a Priority Area or just outside. It may be worth considering having vague or broad-brush boundaries for Priority Areas rather than hard definitive lines which may give local planning authorities some flexibility when forming their own policies. An alternative may be to review the criteria used when assessing and forming the Priority Areas to include a wider scope of constraints.

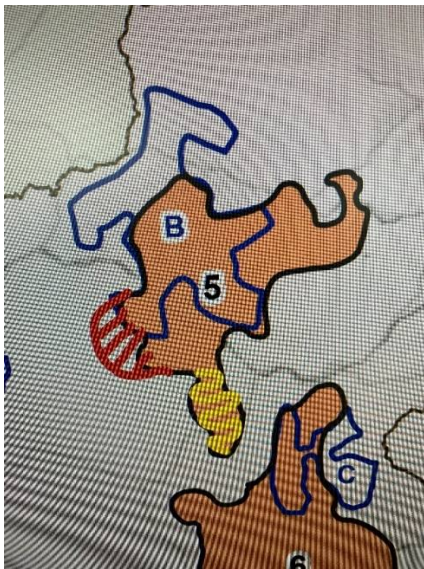


Fig 1 – Priority Area 5

4. From our discussions with the two Distribution Network Operators serving Wales and with National Grid, they all advise that any new grid infrastructure will have to be developer led. We have seen from past experience in mid Wales that new grid infrastructure can only be delivered by developers with the full support of the Welsh Government. Given this, the document doesn't place enough emphasis on the requirement for new grid infrastructure to meet the targets and objectives it sets out. The Welsh Government's role in the need to upgrade Wales' grid infrastructure to accommodate the decarbonisation and increases in demand from transport and domestic heating use through electrification will be a huge challenge. The NDF will need to give the Welsh Government the wide scope of policy support it needs to deliver on this. We believe as drafted this has been under estimated in the Draft NDF.
5. We note the draft NDF does not give much consideration to Battery Storage Technology. Given the policy is to provide guidance for the next 20 years, we believe in that time battery storage will become a leading technology and a vital part of achieving the net zero target. Presumption in favour should be given to battery technology on the grid especially when it can be coupled to renewable energy sites such as large scale onshore wind and solar. We would suggest further consideration is given to this in the final version of the NDF
6. It is considered unlikely that the Priority Areas as mapped will offer significant development opportunities against the targets set, due to the need to avoid noise nuisance at scattered dwellings. This means a large portion of the target will have to come from non-PA developments, so an implicit recognition of this would help avoid any move by LPAs or other consultees towards a negative approach (as happened with developments outside TAN8 SSAs).
7. It must be recognised that the spatial approach adopted by TAN8 ultimately failed to deliver its target and any new policy must be more encouraging towards development.

We kindly ask that you take into consideration our feedback in this letter as part of the Draft NDF consultation and have provided this feedback at a more general level at this stage. We would be happy to meet with representatives of the team and go through each point in more detail if the opportunity to do so arose.

As mentioned earlier in this letter, we very much welcome the publishing of the Draft NDF and are encouraged by the Welsh Government's aspirations and ambition to increase renewable energy generation in Wales. We believe the targets set out within the draft are very much achievable and look forward, as a local Welsh based developer to working with the Welsh Government in delivering on the policy.

Yours Sincerely

Sion Thomas

Director

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