

1<sup>st</sup> November 2019

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

Dear Sir/Madam,

**RE: National Development Framework Consultations**

Community Windpower Limited (CWL) are an independent UK renewable energy company that currently have seven operational onshore wind farms in Scotland totalling 222MW, with an additional 1.7GW consented and in the planning system. In total, the CWL portfolio constitutes 1.9GW and a total investment in the UK in excess of half a billion pounds.

CWL welcome the opportunity to comment on the Welsh National Development Framework (NDF), and in addition to this would like to make a few comments on key points on the Wales Energy Priority Areas. It is our view that these key points must be addressed in order for the Energy Priority Areas in Wales to fulfil an effective role in delivering the renewable energy target for 70% of electricity consumption to be generated from renewable energy by 2030, and the NDF outcome of enabling people to live in places which are decarbonised.

**Assessing the Wales Energy Priority Areas: CWL's Scope**

CWL have produced preliminary site suitability assessments throughout the 11 sites that were identified by the NDF as the priority areas for Solar and Wind Energy developments. A preliminary assessment for each site is based on a 7MW wind turbine which is 200m to tip along with the following design criteria:

- Area available for siting wind turbines – wind farm site has a minimum requirement of 200 MW capacity to ensure viability of scheme;
- A minimum average wind speed of 7.0 metres per second (m/s) at 45 m above ground level (agl), as identified using the ETSU NOABL wind speed atlas;
- Proximity to residential properties greater than 750m;
- Proximity to settlements greater than 2km; and
- Environmental constraints such as proximity to water courses (minimum of 50m), not within Sites of Special Scientific Interest (SSSIs), National Parks, Areas of Outstanding Natural Beauty (AONB), Environmental Protection Areas (EPA) amongst others.

It is important to note that CWL have a number of additional parameters for their site selection process, however none of the 11 Energy Priority Areas passed the above critical parameters and therefore no further assessment was required.

It is also important to note that Solar PV Site suitability assessments have not been undertaken as part of our review, as this is a technology that we currently do not work with.

### Outcome of Preliminary Site Suitability Assessments

Below we have given a brief overview into each site and our reasoning for not taking the site forward. We are happy to provide further evidence of this if required.

Site number	Area/Nearby settlement	Reasons for unacceptable wind farm development area
1	North Wales – Anglesey	Proximity to residential properties <750m; proximity to road network; proximity to watercourses; less than 200 MW capacity
3	North Wales – Colwyn Bay	Proximity to residential properties <750m; proximity to road network; proximity to watercourses; less than 200 MW capacity
5	Mid and South Wales – Newtown Y Drenewydd North	Proximity to residential properties <750m; less than 200 MW capacity
6	Mid and South Wales Newtown Y Drenewydd South	Proximity to residential properties <750m; less than 7.5 m/s wind speed
7	Mid and South Wales – Paincastle Castell Paen	Proximity to residential properties <750m
8	Mid and South Wales – Builth Wells	Wind speeds are too low. The only area with suitable wind speeds is the Sennybridge Training Area (SENTA) which is not open to development.
9	Mid and South Wales – Bethania	Proximity to residential properties <750m
10	Mid and South Wales – New Quay	Proximity to residential properties <750m
11	Mid and South Wales – Carmarthen	Proximity to residential properties <750m;
14	South East Wales – Caephilly, Neath	Proximity to residential properties <750m; eastern area of the Priority Area is too close to settlements;
15	North Wales– Ruthin	Proximity to residential properties <750m; proximity to road network; less than 200 MW capacity

### Discussion

As identified in Table 1, the priority areas are unsuitable for large scale wind developments due to the above stated technical and environmental constraints. CWL are experienced developers of large-scale developments, and due to this, believe the Priority Areas are not suitable for such development and recommend there should be more flexibility to develop elsewhere as required, as long as other planning policies are adhered to.

CWL believe that an open approach to Wales is needed, with criteria-based planning policies that encourage development and investment, thus ensuring Wales is more accessible to large scale wind farm developments. This would help meet the targets outlined in the NDF.

## **The Need of Large Scale Renewable Energy Development**

Climate change is a serious environmental threat that is accepted on a global level. In 2014, the Intergovernmental Panel on Climate Change (IPCC) published the Synthesis Report to the IPCC Fifth Assessment Report which states that scientists are 95% certain that humans are the dominant cause of global warming since the 1950s.

Greenhouse gases occur naturally around the Earth's surface and are essential for keeping the world warm, through absorption of solar radiation and re-radiation into the surrounding atmosphere. However, the levels of greenhouse gases in our Earth's atmosphere have undoubtedly increased because of human activities for example agriculture, transport and most importantly, the burning of fossil fuels to provide power.

Carbon dioxide (CO<sub>2</sub>) emissions are the main contributor to the potential global warming effect, accounting for 81% of the UK's total greenhouse gases in 2016 (BEIS, 2018a).

Progress needs to be made in reducing the UK's reliance on imported energy and in the reduction of greenhouse gas emissions, in particular CO<sub>2</sub>, by reducing the consumption of fossil fuels. In 2017, approximately 29% of the UK's CO<sub>2</sub> emissions are derived from the way energy is produced, hence the importance for energy policies and targets to cut these emissions (BEIS, 2018c).

The Committee on Climate Change (CCC) state *"without action, there is a higher risk of warming well beyond 2 degrees which will have significant consequences for human welfare and ecological systems over the course of this century and beyond (e.g. species extinction, wide spread flooding, drought)"* (CCC, 2010).

Implementation of UK based renewable energy sources would contribute to the improvement of UK energy security, as the reliance on imported energy would be reduced.

The Climate Change Act (2008) set legally binding targets for reducing emission of greenhouse gases by 2020 and 2050. The Secretary of State has a duty to ensure the net UK carbon account for the year 2050 is 80% lower than the 1990 baseline.

In 2011, the UK Government published the UK Renewable Energy Roadmap. The document establishes the current state of renewable energy in the UK, analyses the potential deployment of renewable technologies to meet EU 2020 renewable energy targets and the actions required to achieve this. The purpose of the Roadmap is to monitor and evaluate progress in reducing costs to enable increased deployment of renewable energy (DECC 2011).

In November 2013, DECC published the second annual update of the Roadmap. The update states that good progress is being made towards meeting the 2020 renewable energy target of 15%, with 4.1% of UK energy consumption sourced from renewable technologies in 2012.

Between July 2012 to June 2013, UK renewable electricity generation increased by 24% in comparison to the same period in 2011/2012. In terms of deployment, in Quarter 2 of 2013, renewable energy

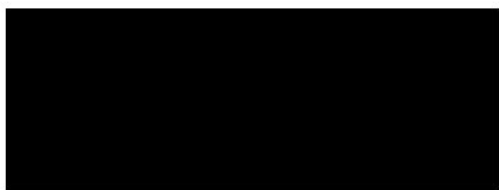
accounted for 15.5% of all electricity generated. Overall renewable energy capacity grew by 38% over this period and stood at 19.5 gigawatts (GW) (DECC, 2013).

This demonstrates that more needs to be done in a UK context and therefore we welcome the proposal from the Welsh Government to have the renewable energy target for 70 per cent of electricity consumption to be generated from renewable energy by 2030, and the NDF outcome of enabling people to live in places which are decarbonised.

However, from a wind farm perspective, the goal of 70 per cent of electricity consumed to be generated from renewable energy by 2030 will be difficult contained within these priority areas. Although the NDF states consideration will be made out with these areas, it is important to highlight that the 11 areas provided are not suitable to accommodate large scale wind farm developments and as such, may discourage developers from considering Wales for investment and development.

I trust the comments provided in this representation are useful and informative. Should you wish to discuss any of the issues raised in our response in greater detail, please contact me on 01928 734 544.

Yours sincerely,



Richard Newsham  
Project Assistant



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