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Title: Wind Energy – A summary of issues in Planning, Policy and Targets. Paper by British Wind Energy Association.

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The BWEA welcomes the opportunity to comment to the Economic Development Committee on the prospects for wind energy in Wales.

These summary notes are an overview of a very wide subject and cannot, in the time available, cover all the issues in depth. As the Energy Review progresses, the BWEA and its members would be pleased to offer further information as required.

The British Wind Energy Association (BWEA) is the trade and professional association for individuals and companies involved in the UK wind energy market. BWEA currently has over 170 corporate members involved in all parts of the supply, development and generation chain. The membership includes all of the major developers, operators and consultants in wind energy within Wales and the UK as well as the European manufacturers.

The following comments reflect the views of a number BWEA member companies that are active in Wales and which have experience of planning, development and operation.

1. **Current situation**

1.1 Wales

The current situation for operational wind farms in Wales is as shown below. The Cemmaes wind farm is in the process of replanting for a larger capacity. Recently approved schemes which have not yet been constructed include Cefn Croes at 60 MW and Moel Maelogen at 3.9 MW.

Existing windfarms

**Wind Farm
Capacity MW**

WTG size kW

No.of WTGs

1	Cemmaes	7.2	300	24
2	Llandinam	31	300	103
3	Bryn Titli	9.9	450	22
4	Rhyd y Groes	7.2	300	24
5	Llangwryfon	6	300	20
6	Taff Ely	9	500	20
7	Dyffryn Brodyn	5.5	500	11
8	Trysglwyn	5.6	400	14
9	Carno	33.6	600	56
10	Rheidol	2.4	300	8
11	Alaw	20.4	600	32
12	Mynydd Gorddu	10.2	5/600	19
13	CAT (1no.)	0.6	600	1
14	Haffoty Uchaf	0.6	600	1
15	Parc Cynog	3.5	700	5
Installed capacity MW =		152.7		360

It will be noted that the majority of the wind farms above (95%) were built in the period up to 1998 and the turbine sizes are now relatively small by current standards. The number of turbines installed is therefore not a good yardstick for comparison.

The electricity produced by these existing wind farms represents around 2.5% of total electricity demand in Wales (based on approx 16 TWh p.a.). The levels of supply and demand in Wales are not easy to quantify exactly. The NAW sponsored SEL report in 2001 reviewed all renewables and, although it contained some errors, it has not been re-issued. Other studies are also underway (e.g. WDA, AEA) to review the current position of generation and demand.

1.2 UK

In the UK there are nearly seventy wind farms with a combined capacity of around 420 MW. With the new Renewable Energy Obligation on electricity suppliers and the central government directive to regional government agencies for RE targets, there are proposals for wind farms in every area of the UK.

1.3 Scotland

Scotland is accelerating its wind capability rapidly after a late start due to NFFO being adopted in England & Wales before the Scottish equivalent (SRO). Scotland has reviewed and re-issued its own planning guidance (NPPG-6) which gives a very positive direction for wind energy. The Scottish Executive has adopted a target of 18%

renewable electricity by 2010, the majority of which will come from onshore wind. It is worth noting that this Scottish policy was assisted by a significant public opinion survey, commissioned by the Executive, which assessed reaction to existing wind farms (published Dec 2000) and which yielded very positive attitudes towards local wind farms. This reflected the results of all other public opinion studies which have shown around 60-70% support for wind farms with up to 10% opposed and the balance neutral.

1.4 Europe

In Europe the total installed capacity of wind power is 15,000 Megawatts with the major countries with wind development as follows:-

Germany - 7,000 MW

Denmark - 2,300 MW

Spain - 2,800 MW

Italy - 560 MW

Netherlands - 478 MW

2. Planning issues & Policy

2.1 TAN-8

Current planning policy is contained in Planning Policy Wales (under revision) and TAN-8 (also under revision). With respect to TAN-8, BWEA has membership of the TAN-8 review group which has been attempting to find some consensus since June 01. A first re-draft is due. BWEA's major concerns on the process of the review of the TAN are:-

- The lack of a guiding overall adopted target for renewable energy in Wales by NAW. At present there is only a requirement to 'contribute' to the UK 10% target. The Welsh contribution (over approx 4% existing) could be anything from 0% to 100%.
- An argument has been proposed by some that the Welsh contribution to climate change could be its landscape alone, with no development of renewable energies.
- The inclusion of Spatial Planning criteria before they have been defined by the Assembly,
- The perception that spatial aspects (meant to be environmental, social & economic factors) are being diminished to 'locational' guidance only, i.e. where to put, or not to put, wind farms, to be determined largely by CCW using the Landmap assessment.
- Reduction of local/regional accountability over any strategic assessment and policy.
- Differences over the subjective evaluation of landscape – i.e. whose landscape is

it?

BWEA has argued that the development of strategic policy on renewable (or other) developments should be led by the Assembly and then taken through local government, starting with the four semi-formal planning regions of Wales and cascading down to County and District level. Both industry and the environmental lobbies should be involved in this but they have strongly held and sometimes polarized attitudes so that consensus is unlikely on the content of policy. Also neither industry nor some of the environmental bodies are directly accountable to the local people who will live with the results of development policy.

2. Landmap

LANDMAP is an assessment tool developed by CCW to consider the whole of the Welsh landscape for planning. Concerns have been raised by professional landscape consultants and planning experts in Wales that this tool has not been subject to reasonable scrutiny by industry, local Govt, the Assembly or the public, and that it is still not being made available for current EIA work. However, it is being promoted to Local Authorities and is appearing in Local Plans. It will therefore, by default, become adopted planning policy and will add an element of 'designation' and planning constraint to all parts of Wales. This could have significant consequences for many forms of development and inward investment.

3. Register of Historic Landscapes

The Register was designed as an advisory document only with a very broad and subjective basis for its contents. At the time of consultation BWEA commented that some of the advisory panel were known opponents of wind farms. As with Landmap, the register is now appearing in Local Plans and is therefore becoming policy by default. The Register was used in the opposition case at Inquiry against the Tir Mostyn wind farm.

BWEA recommends that these tools be subject to full scrutiny, including their effects on planning and the economy, before their application or that they be qualified as not being suitable as policy documents.

2.4 Statutory Agencies

BWEA has been concerned for some time that the statutory body CCW, has opposed most wind farms applications in Wales, sometimes to a degree which would seem to exceed their position as an objective, statutory advisor. Some BWEA members have made complaints to NAW on misleading or incorrect advice issued by CCW to Local Authorities. There have also been difficulties with individual officers, exacerbated by CCW's approach to objections at Inquiry. It has also been raised in a number of Public Inquiries that CCW's own policy on wind

farms, which it applies in its statutory role as advisor to LPAs, is in conflict with adopted National planning policy. This inevitably leads to confusion for developers. CCW's role could be clarified with the benefit of a positive policy by NAW for the development of renewable energy and its remit could be expanded to facilitate the development of appropriate renewable energy projects with respect to the serious implications of climate change and fossil fuel consumption.

2.5 Designated areas

A considerable amount of Wales is covered by one or more designations, all of which affect development and investment. These designations include National Parks, Heritage Coast, SPA, SAC, AONBs, SSSIs, SLA, AOLV, RAMSAR, National Trails, etc. BWEA does not dispute the value of these designations (although many will be affected by climate change, etc) but it is a fact that development within, in proximity to, or visible from, these areas is subject to intense scrutiny and this is a factor in investment decisions.

In respect of the above issues the BWEA makes the recommendation that the broad application of Spatial planning , which includes social and economic factors, rather than environment alone, be applied not just to development, but also to the continuation of existing designated areas and to all new proposed designated areas.

2.6 Call-in procedures

BWEA commented to NAW consultation in September 01. Significant concerns raised over the arbitrary nature of the call-in procedures as applied NAW and its officers. Public Inquiries cause considerable delay to applications and substantial costs. An applicant may need between £100,000 and £250,000 of additional costs for an Inquiry plus uncertainty and delay. Public Inquiries usually have very little involvement for the public or elected members due to the quasi-judicial and adversarial nature of the process.

Some major wind farms which have been delayed in the planning system are as follows:-

Project name	Developer	Location	Capacity Megawatts	Total value £mill	Gestation time, years	Local authority position	Reason for delay
Jordanston	Nat Wind Power	Pembrokeshire	10	8	4	Refused - Inquiry	Refused after Inquiry
Gelligaer	Nat Wind Power	Rhondda	20	16	5	Approved - called in	Awaiting inquiry
Mynydd Clogau	RES	Powys	11	9	5	None - called in	Awaiting Assembly decision

Cwm Llwyd	Nat Wind Power	Powys	30	24	6	None - called in	Ditto
Nant Carfan	Powergen	Powys	20	16	3	Object - called in	Ditto
Pentrefoelas	Nat Wind Power	Conwy	40	32	5	Support - called in	Withdrawn prior to Inquiry
Tir Mostyn	DJ Construct	Denbighshire	21	16	3	Approved - called in	At Inquiry 4/12/01
Total MW =			152				
Total value £mill =				121			
Welsh content £mill =				30			

A key example of concern is Tir Mostyn Wind Farm, which is not in a designated landscape. The Council (Denbighshire) fully assessed the application, the Planning Officer gave a cautionary recommendation for refusal on limited grounds and his elected Committee voted strongly in favour of the project. The project was immediately called-in and it was noted at the subsequent Public Inquiry that CPRW claimed credit for the issue of this call-in by NAW within 1 hour of the Council's decision. Comments on this:-

- NAW could have issued a 'Stop-order' halting development while consideration was given to the Environmental Statement, the LPA report and the minutes of the Committee meeting. The Call-in issued was irrevocable.
- The timing of the call-in, so quickly after the Committee decision, raises a question over the ability of NAW to make such a significant decision within a matter an hour and without reference to the views of local authority or its elected members.
- The call-in forced a public inquiry which has had serious effects on the Welsh company behind the scheme.

BWEA members have also commented that the final decision following an Inquiry lies with a panel of AMs who have not had the benefit of hearing possibly 2-3 weeks of highly specialized evidence at the Inquiry. Also there is no recourse to legal scrutiny of the panels' judgement.

2.7 Offshore & sect 36

As part of the Government's programme for renewables, companies were invited to bid for offshore wind farm sites to the owner of the seabed, The Crown Estates. Three of the eighteen schemes offered leases are off the Welsh coast. These are North Hoyle (off Prestatyn) COWL (off Abergele) and Scarweather Sands (off Porthcawl). All of these projects are in the size range of 60 – 90 MW each with up to 30 of the largest available wind turbines (2 – 3 MW each). The value of each project will be around £60-90 million of which some should be spent with regional companies. These three projects would provide around 4% of present Welsh

electricity demand.

The development of these offshore sites is due to the major investment by the major European countries where offshore wind farms have been in operation for several years and there is a booming market. Current estimates put the amount of capacity scheduled for development at around 20,000 MW, with a value of around £18 billion.

The planning process falls within Section 36 of the Electricity Act whereby the Dept of Trade and Industry will make the final decision. However, full Environmental Impact Assessment is required along with full consultation with NAW, local authorities, statutory bodies, coast & sea users, etc. It is expected that the first applications will be made in 2002. Representations are possible through AMs to the NAW and through M.P.s to Westminster.

1. Targets

3.1 A number of bodies have proposed targets for renewable energy in Wales. Initially there is a need for a 'Headline Target' against which the individual technologies could be considered. The UK target is 10% of electricity by 2010. The EU approved on 7/9/01 a Directive on Electricity from Renewable Energy Sources. This requires member states to contribute towards an overall EU target of 22% renewable electricity by 2010. As noted, The Scottish Executive has established a target of 18% and issued planning policy to support this.

In Wales the currently known suggestions of targets for additional wind energy capacity are as follows:-

	<u>AEA report</u> (accelerated)	<u>AEA</u> (Green)	<u>Env Agency</u>	<u>BWEA</u>
Onshore wind	240 MW	418 MW	350 MW	295MW
Offshore wind	120 MW	450 MW	125 MW	not yet assessed

3.2 Economic aspects

In Wales it is estimated that around £30 million has been invested directly from the current wind farms, and there is around £2 million of annual expenditure of operational works, rates, rentals, etc. Most of the capital expenditure has been in tower manufacture (Cambrian Engineering of Bangor), construction, electrical work and local services. A few components other than towers are made in Wales. It is expected that any new capacity would add to these in similar proportions to their capacity.

The major opportunity for additional economic benefit is in the assembly of turbines and sourcing of components e.g. blades, castings, electrical switchgear. No turbine manufacturer makes an entire turbine in-house. It is assembled with hundreds of components sourced from the whole of Europe. A £10 million pound assembly plant has recently been opened in Scotland in response to their expanding programme. Manufactures and developers would look for a steady and certain expansion programme in Wales and surrounding areas in order to consider investment.