



Strategic Planning Policy Service
Conwy County Borough Council
PO Box 1
Conwy
LL30 9GN

Department: Onshore Wind

Date: 23 January 2019

Contact: Eleri Davies

Phone: [REDACTED]

E-mail: [REDACTED]

By email only to: cdll.ldp@conwy.gov.uk

Dear Sirs,

Conwy County Borough Council: Replacement Local Development Plan

This response to Conwy County Borough Council's Replacement Local Development Plan (the RLDP) is made on behalf of Innogy Renewables UK Ltd. (innogy) which develops, builds and operates renewable electricity generation projects. innogy has eight offices and a portfolio that includes involvement in more than 3 gigawatts of renewable energy capacity across the UK, including 18 onshore wind farms, 5 offshore wind farms and 24 hydro-power generating stations.

innogy has a significant history of developing renewable energy infrastructure in Wales, having built the UK's first commercial offshore wind farm at North Hoyle off the North Wales coast in 2003. innogy has four offices across Wales (Baglan, Mostyn, Llanidloes and Dolgarrog) and employs 138 permanent or fixed term members of staff.

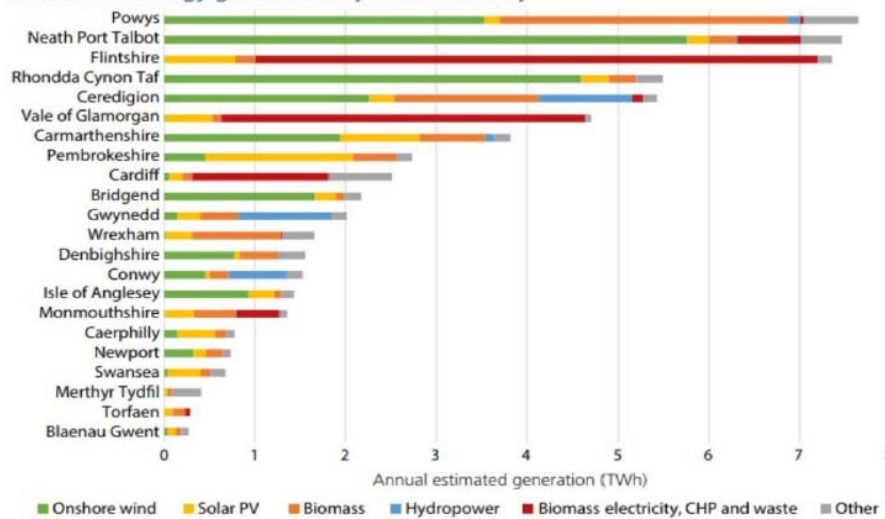
innogy is the largest renewable energy operator in Wales with $\frac{1}{3}$ of the country's total installed renewable energy capacity. In Wales, innogy currently operates one onshore wind farm (the recently inaugurated Brechfa Forest West in Carmarthenshire (57.4 MW)), three offshore wind farms and seven hydroelectric power stations across Wales, with two further onshore wind farms under construction, namely Clocaenog Forest in Conwy and Denbighshire (96 MW), and Mynydd y Gwair near Swansea (32.8 MW). The three onshore wind farms alone amount to a total capital investment of circa £272 million and a green pipeline of 186MW of renewable energy. Once these projects are operational they will invest a further ~£1.4 m each year into the surrounding communities through their associated Community Investment Funds, bringing the total annual community funding to over £2.2m across Wales. We have a 20 year track record of investing in the communities that surround our developments and, in 2018, renewable energy projects operated by innogy invested almost £1.4m into community projects across Wales. The scale of the portfolio and level of investment in Wales is illustrated on the enclosed infographic.

innogy has also recently won a competitive tender and been awarded rights by Natural Resources Wales and Dŵr Cymru Welsh Water to develop a wind farm and electricity storage project at Alwen Forest in Conwy and Denbighshire. innogy welcomes the opportunity to contribute to the consultation on Conwy

County Borough Council’s Replacement Local Development Plan (RLDP) which will have a significant bearing on our future development activities in the area.

The RLDP states that Conwy County Borough Council provided 2.7% of low carbon energy generation for Wales in 2015; this is supported by statistics from the Welsh Government’s Energy Generation in Wales (2016) which shows this area in the bottom half of the league table. The commissioning of the Clocaenog Forest Wind Farm later this year will contribute further renewable energy capacity to the area, and the commitment in the RLDP to provide a supportive policy framework for renewable and low carbon energy generation in appropriate locations is welcomed.

Renewable energy generation by local authority

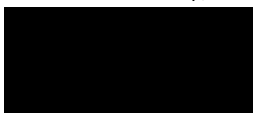


Source: Energy Generation in Wales 2016

innogy supports the priorities set out in the RLDP to reduce the amount of energy we use in Wales, reduce our reliance on energy generated from fossil fuels, and actively manage the transition to a low carbon economy. The planning system, including planning policy at all levels, should facilitate the delivery of these priorities as well as wider Welsh, UK and European targets.

Please see attached innogy’s responses to the Conwy County Borough Council’s specific consultation questions.

Yours sincerely,



Eleri Davies
 Head of Consents UK
 Innogy Renewables UK Ltd.

innogy Renewables

Cymru



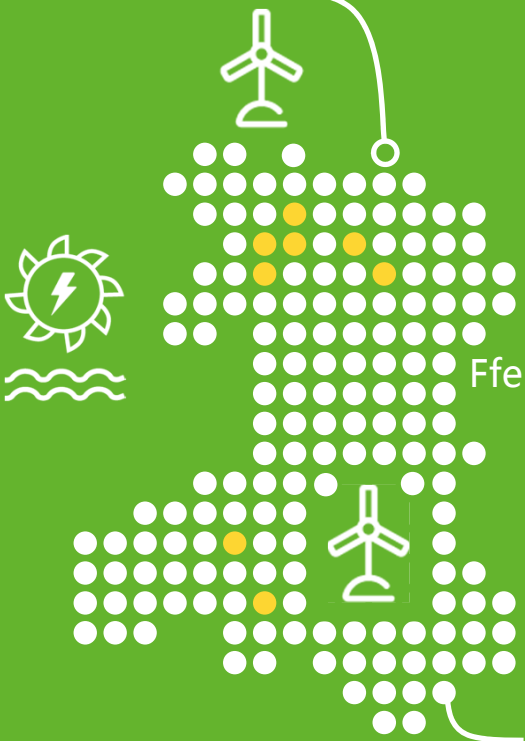
wedi'i adeiladu
North Hoyle
Y fferm wynt ar y môr
gyntaf ar raddfa fawr yn y DU

Gweithwyr
parhaol

138

4 swyddfa

- Baglan
- Dolgarrog
- Mostyn
- Llanidloes



3 + 3 = 7

3 Fferm wynt ar y tir

7 Gorsaf bŵer hydredrydanol

Ymwneud â

956MW

O ynni Adnewyddadwy

Bydd cyllid cymunedol blynyddol yn dod i gyfanswm o dros

£2.2 miliwn

Cyfateb i fuddsoddiad cyfalaf o dros £2.6 biliwn

Penderfyniadau'n cael eu gwneud gan bobl leol, ar ran pobl pobl leol

£2.8 miliwn

Buddsoddiad blynyddol yng Nghymru gan Gwynt y Môr



innogy Renewables

Wales



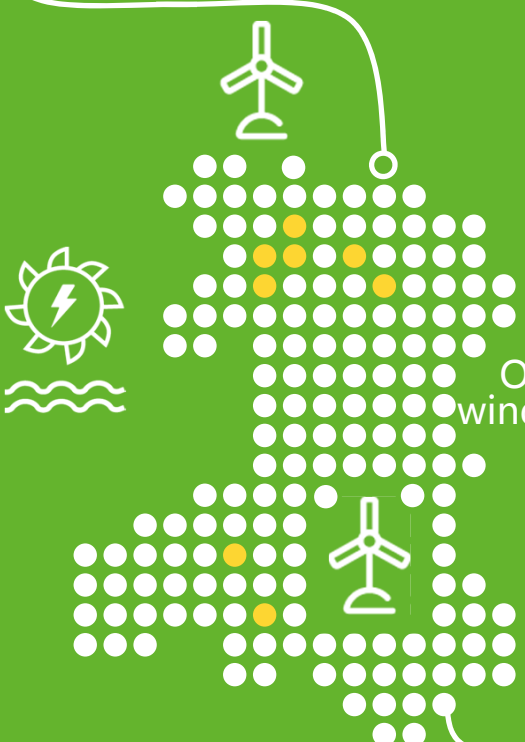
constructed
North Hoyle
UK's first large-scale
offshore wind farm

Permanent
employees

138

4
Offices

- Baglan
- Dolgarrog
- Mostyn
- Llanidloes



3 + 3 = 7
Onshore wind farms
Hydro power stations

Involvement in
956MW
Renewable Energy

Annual community funding
will amount to over

£2.2 million

Decisions made by local people
for local people

Gwynt y Môr typical
spend in Wales is circa
per year. **£2.8 million**





For Office Use Only

Date Received:

Comment Number:

Customer Number:

Replacement Local Development Plan Comments Form

Comments are encouraged via the Council's website <http://conwy.idi-consult.net/ldp> using the on-line form available.

Alternatively, comment forms should be returned to:

The Strategic Planning Policy Service, Conwy County Borough Council, PO Box 1, Conwy LL30 9GN or by e-mailing cdll.ldp@conwy.gov.uk

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Telephone No.	██████████
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2. Agent Details (if any)
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* Where relevant

Consultation Paper 1: Priority Issues, Vision and Objectives

Question 1: Do you agree that the RLDP Structure should be aligned to reflect the obligations of the WFG Act and the subject areas set in PPW (Edition 10)?

Yes – this will make it easier for the user to read the RLDP policies in conjunction with PPW (Edition 10).

Question 2: Do you think that this is the right Vision for the Conwy RLDP?

Yes – the vision strikes an appropriate balance between promoting growth and safeguarding the area's landscape, heritage and environmental assets; and properly recognises the importance of inward investment and infrastructure growth in a sustainable economy.

Question 3: Do you think the Vision is well placed to deliver Sustainable Places in Conwy?

Yes

Question 4: Do you agree with the Objectives?

innogy is the largest renewable energy operator in Wales with 1/3 of the country's total installed renewable energy capacity. In Wales, innogy currently operates one onshore wind farm (the recently inaugurated Brechfa Forest West in Carmarthenshire (57.4 MW)), three offshore wind farms and seven hydroelectric power stations across Wales, with two further onshore wind farms under construction, namely Clocaenog Forest in Conwy and Denbighshire (96 MW), and Mynydd y Gwair near Swansea (32.8 MW). The three onshore wind farms alone amount to a total capital investment of circa £272 million and a green pipeline of 186MW of renewable energy. Once these projects are operational they will invest a further ~£1.4 m each year into the surrounding communities through their associated Community Investment Funds, bringing the total annual community funding to over £2.2m across Wales. We have a 20 year track record of investing in the communities that surround our developments and, in 2018, renewable energy projects operated by innogy invested almost £1.4m into community projects across Wales. The scale of the portfolio and level of investment in Wales is illustrated on the enclosed infographic. innogy has also recently won a competitive tender and been awarded rights by Natural Resources Wales and Dŵr Cymru Welsh Water to develop a wind farm and electricity storage project at Alwen Forest in Conwy and Denbighshire.

innogy is supportive of Strategic Objective 10 (SO10) Energy and Climate Change which seeks to "Secure an appropriate mix of energy provision, including the promotion of Tidal Lagoon, which maximises benefits to Conwy's economy and communities whilst minimising potential environmental and social impacts".

On a related matter, innogy also supports the CCBC's proposed approach to reviewing renewable energy policy(ies) and supplementary planning guidance as set out in Topic Paper 9: Renewable Energy. innogy is also supportive of the commitment to a) promote larger wind turbine development within the Strategic Search Area and supported in national and local policy; b) review current LDP Policy NTE/7 Onshore Wind Turbine Development; c) prepare and adopt a Renewable Energy Supplementary Planning Guidance document; and d) use Renewable Energy Assessments to inform policies, areas of search and allocations which guide local authority scale (5MW – 25MW) renewable energy schemes or other low carbon technologies to the most appropriate locations.

The RLDP should also reflect both changes to national policy (particularly Planning Policy Wales and the forthcoming National Development Framework) and changes to the consenting regime at a national level, including the introduction of the developments of national significance (DNS) process for projects >10MW.

In terms of onshore wind, and whilst recognising the need to balance the benefits against the impacts of proposals, both policy and guidance need to recognise and facilitate the deployment

of taller turbines. There has been considerable change in the onshore wind market in recent years. It is vital that onshore wind farms maximise their efficiency to reduce electricity costs for consumers. Therefore, larger, more productive turbines that maximise energy yields must be considered. The number of smaller turbines available across Europe is reducing due to a lack of demand and advances in technology. Larger turbines need to be considered if onshore wind development is to continue to make a contribution to the Welsh Government's renewable energy targets, including the latest target of 70% of Wales' electricity demand to be met from renewable sources by 2030.

Question 5: *Are there any other objectives that should be considered?*

No

Consultation Paper 2: Strategic Growth and Spatial Distribution Options

Question 1: Which Settlement Hierarchy do you consider to be the best option? (Refer to Background Paper 3 'Hierarchy of Settlements' for greater assessment of the Options)

Click here to enter text.

Question 2: Are there any other settlement hierarchy options you would like to put forward?

Click here to enter text.

Question 3: Do you agree with the figures and rationale for Growth Option 1?

Click here to enter text.

Question 4: Do you agree with the figures and rationale for Growth Option 2?

Click here to enter text.

Question 5: Do you agree with the figures and rationale for Growth Option 3?

Click here to enter text.

Question 6: Do you agree with the figures and rationale for Growth Option 4?

Click here to enter text.

Question 7: Do you agree with the figures and rationale for Growth Option 5?

Click here to enter text.

Question 8: Do you agree with the figures and rationale for Growth Option 6?

Click here to enter text.

Question 9: What is your preferred growth option?

Click here to enter text.

Question 10: Are there any other options we should include?

Click here to enter text.

Question 11: What is your preferred spatial growth option?

Click here to enter text.

Question 12: Are there any other options we should include?

Click here to enter text.

(Continue on a separate sheet /expand box if necessary)

Signature:

Eleri Davies

Date

23/01/2019

Publication of your comments:

Please note that all comments received will be made available publicly and published on the Council's website:

<http://conwy.jdi-consult.net/ldp>

Link to Privacy Notice: www.conwy.gov.uk/spps/privacypolicy