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For the attention of Paul Harrington/Energy Route Map Team

Re: Energy Wales Route Map consultation

The British Wind Energy Association (BWEA) welcomes the opportunity to provide comments on the **Energy Wales Route Map**, and provides this submission on behalf of the UK wind energy industry.

BWEA was established in 1978 and is the representative body for companies active in the UK wind energy market. Its membership has grown rapidly over recent years and now stands at over 325 companies, representing 98.8% of all grid-connected wind energy now installed.

In representing the wind industry, BWEA is in a unique position to comment on the circumstances which will affect the future growth and development of the sector. BWEA would be pleased to clarify any issues raised and offer any further information which may be required.

Wales has a rich renewable energy resource, which provides potential for economic, social, environmental and employment benefits. BWEA has welcomed last year the publication of draft TAN8, which in regard to the delivery of wind energy capacity, will underpin the Route Map. In order to deliver the goals of the Route Map, the final TAN8 document will play a vital role; further refinement of TAN8 will therefore be required to successfully apply the route map, some further points on TAN8 are set out later.

With regard to the Energy Wales Route Map, BWEA have the following specific comments:

THE WELSH PERSPECTIVE

(2) In addition to marine, the first paragraph here should include the wealth of other renewable resources to Wales - the marine resource is no more unique to Wales than the favourable wind resource – wind, solar, and biomass should also be mentioned

A WELSH AGENDA

(3) BWEA supports the 5 identified strands, in particular attainment of a 7TWhr target and the vital improvement to grid infrastructure.

ACHIEVEMENTS SO FAR

(4) The fourth line here should use the word 'cleaner' instead of 'clean'. The use of the word 'clean' may be interpreted to mean a 'green' energy development, whereas this paragraph is referring to fossil fuels.

(6) Lines 2-3 it is suggested that the words '*for at least the short to medium term*' as used instead of '*for some considerable time*' in order to reflect the WAG's aspirations for a significant renewables mix for the future. As an addition to line 4 the Route Map should expand on the other benefits of renewables energy – wording along the following lines is suggested: '*...renewable energy has an important role to play in delivering a low carbon economy, a secure energy mix and stable energy costs as oil and gas prices continue to rise*'.

BWEA welcomes the identified 7TWh target for 2020 – this provides a useful medium term target. Progress towards the target must be reviewed regularly, and the target revised upwards in line with technological progress.

The Route Map correctly points out here that TAN8 will be key to delivering renewable energy aspirations. In this regard BWEA has remaining concerns about certain sections of TAN8 following last year's consultation, and queries as to whether TAN8 can deliver the (2010) target without amendments. These are set out in brief as follows, but BWEA's TAN8 consultation response can be seen in more detail at: <http://www.bwea.com/pdf/tan8-response.pdf>

1) The Welsh Assembly Government's (WAG) intention for local planning authorities (LPA's) to further define Strategic Area's (SA's) is likely to lead to significant delay (which will jeopardise the 2010 target), requiring consultation with a number of organisations and interest groups.. BWEA recommends a deadline for LPA's to further define the SA's and hopes that the Assembly will be able to provide additional assistance with resources and expertise.

2) The margin between capacity that is technically feasible in the SA's and the 800MW target is quite small – it must be certain that there are no further site specific constraints within the SA's to restrict development capacity, and certain that nearly all decisions are favourable if the SA's are to realise the target.

3) The investment and potential contribution to the target of the 1.6GW which has already been scoped (or in planning), and which lies outside the strategic areas, is likely to be lost. It has yet to be established what advice will be given to LPA's on those projects submitted prior to the adoption of TAN8.

4) Developments outside the SA's have been capped at 5MW. Within the SA's smaller developers, including some Welsh developers may suffer if unable to compete in the market place for large scale wind farms, while there is no middle ground for medium scale developments outwith the SA's

5) There is currently insufficient guidance for LPA's with reference to points 1 - 3 above, BWEA hopes that additional resources and expertise will be made available with respect to the above points.

BWEA would hope to contribute any further development of TAN8, and the delivery of the 800MW onshore 2010 target, and would be pleased to provide expertise from BWEA's Head of Onshore – Chris Tomlinson.

BUT THIS IS JUST A START

10. BWEA supports aspirations for a strong marine sector, and would be pleased to offer assistance and expertise from our **Marine Renewables Development Manager**.

BWEA suggest the following wording in line 2 to make the distinction between fossil fuel and renewable energy '*...we need to facilitate many more cleaner fossil fuel and renewable energy projects*'. There could also be a sentence here about the need to maximise the current opportunities for renewables, that will make a significant contribution in the short-term.

Line 13 omits mentioning renewables as contributing to security of supply, BWEA propose additional wording along the lines: *'Security of energy supplies requires us to ensure a diversity of fuel supplies which means pressing for the development of a renewables mix, cleaner coal operations...'*

ACTION PLAN TIMETABLE

Raising Awareness

BWEA welcomes this initiative, and hopes that the environmental and social, as well as economic, importance of global warming will be highlighted. **BWEA would be please to contribute to any awareness-raising initiatives in the form of wind-farm visits, presentations or workshops. In particular BWEA could offer expertise in the preparation of seminars on wind energy issues.**

BWEA supports energy efficiency measures, and notes that many wind energy developments are accompanied by S.106 agreements that contribute to local energy efficiency initiatives.

Renewable Energy Development

BWEA supports the developments of all renewable energy technologies, in order to achieve an energy mix of renewables, and would be pleased to offer expertise in **Offshore wind energy development, from BWEA's Head of Offshore – Gordon Edge.**

BWEA continues to offer assistance in meeting of the 800MW onshore wind target, and the ongoing TAN8 preparation (see points made previously in regard to TAN8).

Development of Marine

BWEA welcomes the WAG's support for marine technologies, and as of last year has a **Marine Renewables Development Manager – Michael Hay**, who works closely with the key players at the front-line of the marine renewables sector. BWEA would hope to be included as a key player in the development of a Welsh marine renewables sector.

Security of Energy Supply

It is important to mention renewables here, as a renewables mix will contribution to security of supply and combat electricity price inflation as oil and gas prices increase

Energy Infrastructure Strengthening

BWEA stresses that this is vital in delivering renewable energy targets, and would hope to be included as a key player, providing assistant through **BWEA's Head of Grid – Richard Ford.**

Drive for Innovation

BWEA fully supports this objective

Reduction of Carbon Dioxide Emissions

BWEA fully supports this objective

The Route Map is a welcome initiative; however it does not fully highlight the opportunities for, and benefits of renewable energy technologies, and more mention needs to be made of the existing renewables that have reached commercial and technological feasibility which will be contributing to the shorter-term timeframe of the Route Map (such as wind, biomass, solar, geothermal), as well as those that will contribute in the future (marine). BWEA would be pleased to contribute to any of the objectives of the route map in the areas of onshore, offshore and small systems wind, grid/infrastructure, and marine renewables.

If you have any queries please do not hesitate to contact BWEA,

Yours Sincerely,

Georgina Wong

Onshore Wind Officer, BWEA

