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RE: Wrexham Borough Council – Preferred Strategy Consultation

BWEA welcomes the opportunity to provide comments on the Council's Preferred Strategy Document 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, wave and tidal energy market. Its membership has grown rapidly over recent years and now stands at over 320 companies, including 98.8% of all grid-connected wind energy now installed.

The UK has a rich variety of renewable energy resource, including 40% Europe's wind resource. Wind energy currently supplies approximately a million homes in the UK. It is important to support and encourage the growth of the sector and associated benefits.

In representing the wind industry, BWEA is in a unique position to comment on the circumstances which 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.

Thank you for the opportunity to submit comments on the Preferred Strategy Document. If you have any queries please do not hesitate to contact me.

Yours sincerely,

Gemma Grimes
Planning Advisor, BWEA
020 7689 1936



Wrexham Borough Council – Preferred Strategy Consultation – Comments from BWEA

BWEA welcomes the preparation of the Council's Preferred Strategy Document and the assertion that the Council will 'place sustainability at the heart of the plan'. BWEA is particularly encouraged at the extent to which renewable energy has been integrated into this document, demonstrating the explicit links between renewable energy and improved environmental quality, and the role of renewables in addressing climate change (pages 12 and 14).

BWEA wishes to emphasise the important contribution that the Council's policies can make in contributing to both the national and regional targets for renewable energy generation, and is pleased that the Council is willing to take action to reduce the harmful effects of climate change.

RE: Reducing Carbon Emissions of New Development

BWEA welcomes the Council's strategic policies on reducing the harmful effects of climate change, as broadly identified within this document. BWEA also has a number of recommendations to be taken forward for inclusion in the Deposit Plan.

BWEA strongly welcomes the Council's decision to incorporate a prescriptive carbon reduction and micro-generation policy, in line with TAN8 policy requirements. BWEA also strongly supports the Council's plans to expect all new development, (including conversions and major extensions to existing buildings) to reduce their predicted carbon emissions through implementing sustainable building practices and improved energy efficiency.

RE: Renewable Energy Generation

BWEA warmly welcomes the Council's positive position regarding stand alone renewable energy generation, and particularly welcomes the following statement, taken from page 26 of the Document, which acknowledges the role the Council can play despite being outside of any Strategic Search Areas:

[T]he County Borough can still contribute to achieving the Welsh renewable energy electricity generation target through community based wind farm schemes (up to 5MW) in the rural uplands, schemes to generate electricity from landfill gas and, in terms of renewable heat generation and biomass district heating schemes. There is... significant potential in the County Borough for small-scale renewable energy generation through both small stand-alone micro installations and the integration of renewable energy generation equipment into the design of new buildings and retrofitted to existing buildings.

BWEA strongly recommend that this statement be retained and included in the justification of a future renewable energy policy within the Deposit Draft.

However, with regard to the second paragraph, BWEA request that the Council provide greater clarification as to the assessment of 'adverse impact' in the Deposit Plan policy, in order to ensure that the final policy is not unduly restrictive. There is a need for clarification as to how a renewable energy policy would sit in relation to 'areas of protection' as identified on Figure 2, page 32, for example.

BWEA therefore consider this policy in its current form, stating that renewable energy generation '*will be encouraged provided that there is no adverse visual, noise, dust, odour and traffic impact on the historic, built and natural environments and on residential amenity*' to be excessively restrictive and in need of modification and clarification.

Thank you for the opportunity to submit comments on these documents. BWEA looks forward to future opportunities to participate in this consultation. If you have any queries please do not hesitate to contact BWEA.