Chloe Duddy

LDP-PS-REP-74

From: Rebecca Elliott <Rebecca.E@CommunityWindpower.co.uk>
Sent: 27 January 2020 14:30
To: Local Development Plan
Subject: Community Windpower Consultation Response on Draft LDP
Attachments: 100-200114-1004.docx

Good Afternoon,

Please find attached Community Windpower's response to the Derry and Strabane Draft Local Development Plan.

If at any point you require any more information on our comments please do not hesitate to contact us.

Many thanks,

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27th January 2020

Planning LDP Team
Derry city and Strabane District Council
98 Strand Road
Derry
BT48 7NN

Our Ref: 100-200114-1004

Dear Planning LDP Team

RE: Derry and Strabane Draft Local Development Plan Consultation Response Comments

Operating since 2001, Community Windpower Ltd (CWL) is committed to renewable energy to help reduce the serious threat that Climate Change now poses. CWL is at the forefront of wind energy development in the UK with over 1GW built, under construction and in development. We are proven renewable energy specialists with seven operational wind farms in Scotland.

CWL are wholly committed to fulfilling community obligations once planning permission has been obtained and we work closely with our local host communities to provide economic, educational, environmental and social benefits for the lifetime of the wind farm. We are committed to working with local businesses to increase renewable energy development and deployment, to tackle climate change and boost the local economy.

Our local business investment and support policy is a crucial component of all our projects as we maintain our commitment to our communities and business partners and the national green energy industry, whilst ensuring our inward investment to the local economy remains paramount. CWL works closely with local civil, electrical and engineering contractors and local businesses to construct all our wind farms.

Since 2006, CWL has invested over £300 million for its seven operational wind farms in Scotland. This will increase to £700 million by 2020 and £2 billion by 2022.

Ultimately CWL have considerable experience of the challenges delivering and benefits derived from renewable energy harnessed by the wind. We believe strongly that the Derry City & Strabane District Council LDP needs to continue supporting onshore wind and to this end we would like to draw to your attention the following observations on the draft LPD.

Derry City & Strabane District Council LDP (2032)

CWL welcomes Derry City & Strabane District Councils commitment to renewable and low carbon energy development as well as the Council's recognition of the contribution wind farm developments make to local businesses and communities, via business rates and community funds.
The draft LDP makes a number of significant statements with regards to Wind Farm developments, namely:

'24.2 Renewable energy developers have to date taken great advantage of the District's potential, in particular through the granting and implementation of planning permission for single wind turbines and wind farms. As of March 2017, the Derry City and Strabane District is the single largest producing council of renewable energy, generating approximately 27% across NI'.

CWL recognises the significant contribution that the Derry City & Strabane District has already made to accommodating onshore wind farms. Notwithstanding this, we do feel that some of the policies in the proposed LDP fail to recognise recent changes and adaptations that have taken place within the onshore wind industry as a whole. More specifically the changes within the wind industry since the UK Government's removal of onshore wind financial support mechanisms.

The framework of the Renewables Obligation (RO) created significant demand for renewable generation in the UK, and a large proportion of these proposed new developments were for onshore wind farms (Ofgem, 2019). The RO helped to increase the proportion of electricity supplied from renewable sources.

The closure of the RO subsidy regime in 2015, dictated that the nature and design of newly proposed onshore wind farm proposals needed to change to meet new market demands. As a result, onshore wind developments now need to optimise the efficiency and production of sites through the incorporation of larger typology wind turbines, with larger tip heights and rotor diameters. Bigger turbines capture more wind energy and do so more efficiently at greater altitudes, where wind production is more consistent. Modern onshore wind farms will continue to take advantage of these advancements in turbine design which now extend to 7MW turbines with tip heights of up to 250m AOD. Only by utilising these advanced and larger wind turbines can an onshore wind power be commercially viable in a subsidy free world.

The Derry City & Strabane District Council LDP should therefore recognise that the viability of new onshore wind farm projects and the repowering of existing wind farm sites now hinges on the acceptance of larger, more powerful turbines which make a greater contribution to the energy supply and meeting the challenging international and national carbon reduction targets.

LDP Policy 'RED1' Renewable and Low Carbon Energy Development – General Criteria', refers specifically to Wind Energy Development and states that 'proposals for wind energy development, including proposals for repowering of existing developments, will be required to meet a number of criteria'.

CWL endorses the majority of the criteria listed in RED1, however criteria ix, states that above-ground redundant plant (including turbines), buildings and associated infrastructure shall be removed, and the site restored to an agreed standard appropriate to its location. A time limit condition of 30 years will normally be attached.

As technology in the renewable sector is improving many turbine manufacturers are producing technology that can safely create energy for much longer than 30 years. Many turbines and wind farms currently have an operational lifetime of 40 years so this would imply that the time limit condition is not correct or reflective of current changes in technology. The time limit condition in the final LDP should be between 40 and 50 years as renewable energy technology improvements are happening at a very rapid rate.

Paragraph 24.17 is related to the idea that there has been a period of intensive renewable energy development in this District, especially in relation to wind, so areas within the District are reaching saturation point. This will in turn lead to there being a higher scrutiny of future wind farm applications. If there are areas that are saturated, it would be helpful for developers to see where these areas are. In an effort to address this issue, the Derry City & Strabane District Council LDP refers to the future preparation of an assessment of Wind Energy Capacity Areas (WECAs) which CWL understands is currently a strategic aspiration. CWL supports the preparation of such an assessment, as it will help inform both wind farm developers and consultees alike on what land can potentially be utilised for wind farms going forward. Clearly the emergence of this guidance is a work in progress however to reiterate the point made above, any capacity assessment must acknowledge and reflect the changes in the onshore wind industry in the subsidy free market the industry is now in.

Yours sincerely,

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