

RESIDENTS AGAINST THE CF3 INCINERATOR – DNS APPLICATION 3236340
A RESPONSE TO DOC100 – SECTION 3
LOCAL OWNERSHIP OF ENERGY GENERATION IN WALES

INTRODUCTION

This document is Residents against the CF3 Incinerator's response to DOC100 – Section 3 Local Ownership of Energy Generation in Wales.

DOC100 Section 3 provides a response to the points we raised in our response to several points relating to Socio-Economic benefits in their Environmental statement.

However, we find nothing in the applicant's response that significantly alters our previous response or concerns, which we consider remain valid.

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Applicant's response comment

- *3.2.6 - Furthermore, rather than detract from the Government's ambitions for renewable energy, the proposed ERF will supply 15MW of electricity to the local electricity network, sufficient to power 30,000 homes. It will also assist in maintaining a reliable and consistent source of electricity that assists in balancing inertia caused by the intermittency of renewable supplies of energy.*

The applicant states they will locally supply 15MW of electricity and assist in balancing the intermittency of renewable energy supplies.

Our response

The applicant's response does not provide any evidence of how they will comply with the Local Ownership of Energy Generation in Wales policy or whether they have considered this policy and if they can provide an opportunity for an element of local ownership.

They make the following assumptions in their statement:

- **The proposed ERF technology will be regarded as renewable or low carbon.**
The Welsh Government is committed to decarbonisation and tackling the climate emergency. Wales is abundant in opportunities to generate renewable energy and the Welsh Government is committed to maximising this potential, i.e., "wind, water and wave".
The UK Climate Change Committee has recently advised the Welsh Government that a significant growth in greenhouse emissions from the waste sector is attributable to emissions from ERF plants.
- **There is a need for 15MW of locally supplied electricity and assistance to balance inertia caused by the intermittency of renewable energy sources.**
In 2018, Wales generated an estimated 30.2 TWh of electricity, while consuming approximately 14.9 TWh.

This means Wales generated twice as much electricity as it consumed and was a **net exporter of electricity to England, Ireland and the wider European electricity network.**

Welsh Government's commitment to renewable energy projects is a key priority and as part of this they will work with key stakeholders to develop a new strategic grid infrastructure. There is a presumption in favour of large-scale wind development in already Pre-Assessed areas.

We understand that in the short term, gas, nuclear and bio-energy (fitted with Carbon Capture and Storage) will provide the energy to compensate for the intermittency in supply from renewable resources.

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CONCLUSION

The applicant points out that Page 6 of the Local Ownership of Energy Generation in Wales policy states:

*“This policy is not intended to inhibit development in Wales by experienced developers, who have the skills, capacity and desire to generate electricity which meets needs and is designed and delivered in harmony with the people and places hosting it. **However, it does set out our expectation for developers to make every effort to deliver the expected element of local ownership”.***

Therefore, in conclusion we reiterate that:

- The applicant has not provided any evidence of how they propose to comply with the Local Ownership of Energy Generation in Wales policy.
- The applicant has not shown any consideration for this policy, in particular if there is an opportunity for an element of local ownership, as expected.
- The applicant has not made a proposal to retain GVA in Wales or how they will prevent GVA leakage from communities in the local and wider areas.
- The applicant has not demonstrated a need for the electricity generated by the proposed ERF.

In our opinion the applicant is non-compliant with the Local Ownership of Energy Generation in Wales policy as they do not outline or demonstrate how they could deliver the expected element of local ownership.