



Consultation response

**Friends of
the Earth**
Northern Ireland

Response to draft PPS18: Renewable Energy

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- dependent upon individuals for over 90 per cent of its income.**

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Response to draft PPS18

1. Introduction

Friends of the Earth welcomes the opportunity to comment on draft Planning Policy Statement 18: renewable Energy. Developing renewable energy is vital if we are to tackle climate change. Draft PPS18, however, falls short of what is required to maximise the development of renewable energy schemes.

The draft policy states, ‘the primary aim of this Planning Policy Statement is to encourage and facilitate the provision of renewable energy...’, however the tone of the rest of the policy is disappointing. Wind power in particular is treated as a problem which, reluctantly, has to be accommodated.

The document is also short on policy detail. Decentralised energy generation is mentioned in passing only and restructuring the grid is not considered. If renewable energy is to play a major part in generating energy, which it must, the grid needs to be restructured to accommodate, micro-renewables and intermittent generation, and to improve efficiency.

Disappointingly, mass burn incineration of municipal waste is still treated as a source of low carbon electricity.

2. Policy Context and Objectives

There is little sense in the document that climate change is the single most important consideration facing society. It is just listed as another consideration along issues such as landscape amenity value and built heritage. Important as these considerations are, they are clearly not as important as the very immediate need to prevent catastrophic climate change.

Friends of the Earth would like to see a presumption in favour of the development of renewables, with appropriate exceptions. The tone of the draft policy, however, appears to suggest the opposite – renewables can go ahead if they can be kept out of sight and out of mind. This is especially the case with wind. Northern Ireland has very a valuable wind resource and planning policy should encourage the reasonable exploitation of it.

There is no mention made of a Planning Policy Statement on climate change in the document, although such a PPS is in the pipeline. A PPS on climate change would alter significantly the policy context in which PPS18 is set and its omission looks like a serious oversight.

3. Policy RE1 – Renewable Energy Development

As stated earlier, wind power seems to be considered as a nuisance rather than as part of the solution to climate change. There is disproportionate space given to addressing the visual impact of wind farms and emotive language such as ‘sacrificed’ landscapes simply reinforces the impression that wind is a problem. Proposals for wind farms have additional requirements that need to be satisfied, while just one passage, A51, mentions the importance for ‘society to accept them’.

There is repeated mention of unacceptable adverse impacts but these are left undefined and are open to misinterpretation. It would be unacceptable for legitimate proposals to get bogged down in lengthy appeals, Judicial Reviews or be refused permission because of a malicious misinterpretation of the policy.

The proviso on CHP in the second paragraph of RE1 potentially leaves the door open to large-scale incineration, most likely of municipal and agricultural wastes. Such large-scale plants merely perpetuate the problems of inefficient electricity generation and distribution associated with the

current generating model. Small-scale CHP close to both the end users and the fuel source is significantly more efficient than large-scale, centralised generation.

Justification and amplification

4.1 states renewable energy development ‘is vital to facilitating the delivery of the Government’s commitments on both climate change and renewable energy’ but no mention is made of the economic, social, environmental and moral obligation to act on climate change. Government targets can be altered while the moral imperative to prevent run-away climate change is unchanging.

4.5, 4.6 and 4.7 state renewables proposals will not be permitted unless ‘there are imperative reasons of overriding public interest’. Surely it is in the public interest to tackle climate change.

4.6 further states that development will not be permitted ‘unless it is necessary for reasons of human health, public safety, or beneficial consequences of primary importance to the environment...’ Again, without wishing to come across as glib, tackling climate change by switching to zero carbon and low carbon sources of energy meets these criteria ably. Their inclusion in a section dealing almost exclusively with wind power, therefore further reinforces the message that wind power is a problem.

4.8 and 4.9 state planning permission ‘...will only be granted where it can be demonstrated that the objectives of the designation will not be compromised...’ Such designations, though important, will become increasingly irrelevant as climate change intensifies. Consideration should be given to the designations listed, but it should also be borne in mind that the species for which sites received their protected status are likely to migrate north or, if unable to migrate, become extinct as a direct consequence of climate change.

Landscape and Visual Effects of Renewable Energy Development

Friends of the Earth has serious concerns about the guidance associated with the use of Landscape Character Areas, though not with the use of LCAs to themselves. The guidance appears to leave little room for the development of wind energy. For example, landscape features such as buildings and field boundaries are to be avoided because the relative scales can make the wind turbines appear larger than they are. The rural nature of Northern Ireland and the scattered pattern of development mean buildings and field boundaries are hard to avoid, except in upland areas of high scenic value. Not surprisingly, the guidance recommends such upland areas are also to be avoided. The guidance further adds to the overall impression given by PPS18 of negativity to wind power.

Community Involvement and Development

Friends of the Earth believes that community involvement in the planning process is vitally important and produces better results which are acceptable to all parties. We welcome the inclusion of this section in the draft policy.

4. Policy RE2 – Integrated Renewable Energy and Passive Solar Design

Friends of the Earth welcomes the inclusion of Passive Solar Design in PPS18. We feel, however, the requirement to give consideration to PSD should be extended to smaller urban developments and single urban dwellings. Passive Solar Design can be used successfully in most building types, including renovations and extensions to existing buildings.

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Justification and amplification

We welcome the Department's efforts to promote the uptake of micro-renewables, and energy efficiency through the use of Passive Solar Design. It is through greater energy efficiency that the largest and most economical cuts in carbon emissions can be made.

Building Regulations

4.34 It is disappointing that the Minister for Finance and Personnel has decided to scrap the requirements for mandatory micro-renewables in all new build. Friends of the Earth believes this is a regressive step which has jeopardised the development of the fledgling renewables sector in Northern Ireland. We would like to see these requirements reinstated as a matter of urgency.

5. Annex 1

A - Wind Energy

As stated above, Friends of the Earth believes there is disproportionate attention given to minimising the visual impact of wind farms. The use of strong, emotive language simply strengthens the overall impression that wind energy is a problem that we must try to live with. The evidence from large wind farms in GB, Ireland and Europe is that local people do not consider them to be visually intrusive.

B - Biomass

Friends of the Earth is of the opinion that Municipal Solid Waste and agricultural waste should be directed to anaerobic digestion rather than incineration. Large-scale, mass-burn incineration is not compatible with the climate change imperative. Small-scale, decentralised anaerobic digestion with Combined Heat and Power is a more sustainable and preferable solution.

C – Energy from Waste (biological processes)

Friends of the Earth welcomes the inclusion of this section and would like to see the development of a network of small-scale, and farm scale, anaerobic digestors with Combined Heat and Power plants. In the short term we would also like to see greater exploitation of landfill gas as an energy source. Methane from landfill is a significant contributor to climate change and efforts to reduce its impact are to be welcomed.

D – Energy from Waste (thermal processes)

Friends of the Earth believes biodegradable municipal and commercial waste, agricultural waste and sewage sludge should be diverted to anaerobic digestion. The remaining component is not eligible for Renewable Obligation Certificates, so incineration of waste should not be considered as renewable energy. Incineration destroys a valuable resource which then requires considerable energy and materials input to replace. Consequently, incineration contributes to climate change and should not be considered in a policy aimed at tackling climate change.

Conclusion

Friends of the Earth welcomes to opportunity to comment on draft PPS18. We feel, however, that the policy should be championing the development of renewables rather than simply accepting their inevitability, somewhat reluctantly it appears.