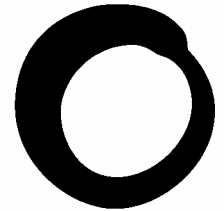


January 2004



**Friends of
the Earth**

Consultation Response

Planning Policy Statement 22: Renewable Energy

A response by Friends of the Earth

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Friends of the Earth is:

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- the most extensive environmental network in the world, with almost one million supporters across five continents and over 60 national organisations worldwide
- a unique network of campaigning local groups, working in over 200 communities throughout England, Wales and Northern Ireland
- dependent on individuals for over 90 per cent of its income.

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Planning Policy Statement 22: Renewable Energy

Introduction

1.1 Friends of the Earth is one of the UK's most influential national environmental campaigning organisations. We have over 130,000 supporters and have a unique network of campaigning local groups active in over 200 communities nationwide. 90% of our income is from individual donations. We welcome the opportunity to comment on this draft policy statement on renewables.

1.2 We are strong supporters of the development of renewable forms of energy as a means of combating the threat of global climate change. We were supportive of the Government's vision for a sustainable low carbon energy system as set out in the Energy White Paper, published in February of last year.

1.3 The primary purpose of developing renewable energy must be to deliver a net reduction in emissions of carbon dioxide – the 15% target for renewable electricity by 2015 is a means of achieving that end. It also supports the development of a new sustainable industry with considerable economic and social benefits.

General comments

1.4 Planning has an important role to play in helping us to move from a highly centralised, fossil fuel and nuclear based energy system towards a more distributed and sustainable renewable energy system. The consequences of this are that increasing numbers of Local Authorities, who have previously had little involvement in the consideration of energy projects, will need to adopt policies and assess applications. It is therefore imperative that they receive clear and unequivocal guidance from Government.

1.5 We welcome the publication of this updated draft policy planning statement on renewable energy. We also eagerly await the publication of the technical annex. Together, these documents should help to provide the necessary guidance for Local Authorities. Such is the importance of the need to take action to mitigate the impacts of climate change, we believe that the final publication of this policy statement should be accompanied by a Ministerial Statement to ensure that its significance is fully appreciated by all Local Authorities.

1.6 We disagree however, with the stated scope of the statement and believe it should include consideration of issues relating to the use of renewable energy in new housing and industrial and commercial developments. We are aware that at least 24 authorities are currently considering the inclusion of policies relating to this issue in their plans (see Annex 1). This is to be welcomed and we strongly believe that this edition of PPS 22 should reflect and consolidate the initiative already being demonstrated at a sub-national level.

National Planning Policies

Key Principles

1.7 The key policy dilemma for PPS 22 is to balance the imperative for the development of renewable energy technologies with respect for important statutory designations relating to biodiversity, built heritage and landscape quality. In our view, renewable energy development, which is of a scale and form that does not damage the intrinsic value of such designations, should be encouraged. However, there should be no relaxation of the stringent

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policy tests for all kinds of development in these areas. Outside statutory designations, PPS 22 should provide stronger general encouragement for the development of renewable energy technology by creating a presumption in favour of such development. Such a presumption would send a clear message that development should be encouraged unless there are clearly defined and weighty material considerations to refuse. In striking this balance, it is vital to provide detailed guidance on the criteria that Local Planning Authorities should incorporate into Local Development Frameworks.

Specific Comments

1.8 On the whole we support the key principles outlined in the statement, in particular, the fact that policies should “promote and encourage, rather than restrict” the development of renewables (Paragraph ii). We have concerns that insufficient guidance has been provided for Local Authorities in the drawing up of criteria for the assessment of applications (Paragraph iii) but we welcome the fact that the possibility of Government intervention is specifically mentioned and hope that the good practice guidance to be included in the technical annex will help to give more clarity.

1.9 We welcome and support the statements (Paragraph iv) that wider environmental and economic benefits of renewables are a material consideration and that the benefits of the proposal and evidence of impact minimisation should be included in development proposals (Paragraph vii).

1.10 We welcome and support the statements that planning authorities should not make assumptions about technical feasibility (Paragraph v) and that community involvement should be at the heart of the decision-making process.

Regional targets

1.11 We support the setting of minimum regional targets for renewable energy. We, however, strongly believe that it should be possible to express targets at a regional level *either* in terms of total electricity generation in the region *or* total energy consumption in the region. It is likely that over the next few years regional energy consumption data will be made available (the DTI recently consulted on this issue) and the PPS should not therefore be so prescriptive as to prevent authorities from taking a different (and to our mind, better) approach to target setting.

1.12 The term ‘renewable energy’, used throughout the document, encompasses all forms of energy i.e. not just electricity generation. To clarify this, the planning statement should recommend the setting of regional targets for renewable sources of heat and renewable forms of transport fuels as well as renewable electricity.

1.13 Although we welcome the statement that targets should be regularly reviewed and revised upwards (if they are met), we would suggest, given the pace of change in the development of renewable technologies, that the PPS should stipulate that reviews should be conducted at least every 5 years.

1.14 We welcome the statement that fixed targets should not be set for specific technologies. We believe that a similar statement is necessary in relation to sub-regional targets – sub-regional targets should be indicative only and should also be specifically referred to as minimum targets (at present the PPS only makes this statement in relation to regional targets).

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Policies in Regional Planning Guidance and Development Plans

1.15 We support the approach outlined in the statement.

Locational Considerations

International Designated Sites

1.16 The PPS makes clear that stringent policy tests should apply to renewable energy development which affects international designations. We believe that an even greater emphasis should be given to the absolute protection of such sites so that development will only be permitted where it can be shown that there will be no appreciable damage to the designated area.

National Designations

1.17 We support the draft statement in relation to the stringent protection of national designations from any inappropriate form of development. However, where it can be shown that small-scale renewable development will not damage the intrinsic value of designations such as National Parks, they should be encouraged. Likewise, small-scale renewables should be considered in conservation areas and on listed buildings where it can be shown that no damage to the intrinsic value of the building would result.

Green Belts

1.18 We recognise that this is a sensitive issue and support the draft statement of policy on this issue.

Buffer zones and Local Designations

1.19 We do not believe the buffer zones on local designations should be used to unreasonably refuse renewable energy projects which have clear environmental benefits. However, such local designations are a vital aspect of planning policy, allowing local communities to express their aspirations for environmental protection and enhancement. Such designations should remain a material consideration in the determination of all forms of development, including renewable energy.

Other Locational Considerations

1.20 The draft statement dismisses the use of sequential approach in determining renewable energy projects. Such an approach is commonly used in relation to built development and the protection of brownfield sites. This is clearly not appropriate to all renewable energy projects. However, PPS 22 should consider how the sequential model might be used in developing guidance for Local Authorities on how they can coherently express criteria based policy for the development of renewable energy.

Visual Effects

1.21 Assessing the visual impact of development is to some extent a subjective process. However, landscape impact assessment is a long-standing part of the determination of other forms of development, including minerals extraction. Where appropriate, landscape impact assessment should be a key way of understanding the potential impact of renewable energy. Local Authorities should seek to avoid such impacts where they unacceptably degrade the

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intrinsic value of statutory designations. Where avoidance is not possible, comprehensive mitigation should be applied.

Noise

1.22 We support the draft statement of policy on this issue.

Odour

1.23 We support the draft statement of policy on this issue.

Biomass Projects and Energy Crops

1.24 We believe it is important to state that distances travelled by fuel at the beginning of a project may reduce over time, as the number of sources of appropriate fuels expands with increased interest and investment in this source of renewable energy. Planning authorities should take this into consideration when assessing transport impacts.

Wind turbines

1.25 We support the draft statement of policy on this issue.

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Annex 1

Source: Merton Local Authority



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UDP Renewable Energy Policies

List of Authorities adopting, or considering adopting, prescriptive policies – THIS LIST IS STILL BEING COMPILED

<u>Adopted</u>	<u>Included in draft UDP</u>	<u>In the process or considering</u>	<u>Expressing interest</u>
Merton	Croydon Ealing Waltham Forest Bromley Barking & Dagenham North Devon Sefton Oldham Sefton Westminster	Leicester City Council Belfast Newcastle Liverpool Edinburgh Waveney Sedgefield Derby Charnwood BC Brighton & Hove	Corporation of London Havering Cambridge

Authority	Contact	Policy Details
London Borough of Merton	Adrian Hewitt adrian.hewitt@merton.gov.uk	All new non-residential development above a threshold of 1,000 sqm will be expected to incorporate renewable energy production equipment to provide at least 10% of predicted energy

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		requirements.
London Borough of Croydon	Eddy Taylor EDDY_TAYLOR@croydon.gov.uk	The Council will expect all development (either new build or conversion) with a floorspace of 1000m2 or ten or more residential units to incorporate renewable energy production equipment to provide at least 10% of the predicted energy requirements.
Sefton	Steve Matthews steve.matthews@planning.sefton.gov.uk	All proposals for major non-residential development will be expected to incorporate renewable energy production equipment to provide at least 10% of their predicted energy requirements from renewable sources.
London Borough of Ealing	Michael Calderbank michael.calderbank@ealing.gov.uk	Require all major developments (above a threshold of 1,000 sq m or 10 dwellings) to incorporate equipment for renewable power generation so as to provide at least 10% of their predicted energy requirements;
London Borough of Waltham Forest	Ken Bolland Principal Planning Officer Ken.Bolland@lbwf.gov.uk	From all new commercial/industrial and housing developments over 1000 sq ms and 10 units respectively, to be from renewable energy sources, through on-site generation from renewable heat and power.
Bromley	Katie Ryde katie.ryde@bromley.gov.uk	“Proposals for any development which will result in a gross floor area of 1000 sq m or more (or 100 or more Class C3 residential units) will be expected to incorporate on site renewable power generation equipment to provide at least 10% of the projected energy requirement from one or more renewable sources. Where it is proposed not to include renewable energy generation, the applicant will be expected to demonstrate why this is not feasible.”
Barking & Dagenham	Joe Baker	All developments above 2,000 square metres will be expected to

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	joe.baker@lbbd.gov.uk	incorporate renewable energy production equipment to provide at least 20% of predicted energy requirements”
North Devon	peter_longworth@northdevon.gov.uk	The expectation will be that at least 15% of the predicted annual energy requirements of a particular development should be met by means of independent renewable energy generation. Depending on the scale and nature of development, such ‘micro’ generation could include combined heat power plants, fuel cells, wood fuel boilers, heat pumps, solar panels or photovoltaics. For the purposes of Policy ECN15 major development is defined as 1000 m sq (gross) or more of employment or retail floorspace or at least 50 dwellings.
Oldham Metropolitan Borough Council	Sarah Barker ppr.sarah.barker@oldham.gov.uk	NR3.3 For all major new developments, including residential developments comprising 10 or more units, and non-residential developments exceeding 1000m ² gross floorspace, the Council will require 10% of total predicted energy requirements to be provided, on site, from renewable energy sources.
		Comments
Leicester City Council	Alison Lea leaaa001@leicester.gov.uk	Leicester City Council is currently in the middle of adopting a revised Local Plan and has a similar policy proposed. The Local Plan is subject to a Public Enquiry in February.
Belfast City Council	Hugh James Killen hjkillen@hotmail.com	“I hope that we shall be able to introduce such a positive planning policy in Northern Ireland. At the very least I shall be bringing

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		this planning policy onto the agenda.
Newcastle City Council	Colin Percy Senior Policy Officer colin.percy@newcastle.gov.uk	We have this under active (fairly) consideration
Liverpool City Council	Mike Eccles mike.eccles@liverpool.gov.uk	Actively considering adopting a renewable energy requirement policy.
Corporation of London	Paul Kennedy Energy Manager paul.kennedy@corpoflondon.gov.uk	Expression of Interest
Havering	Mark Lowers Energy Management Officer Mark.Lowers@haverling.gov.uk	Expression of Interest
Sedgefield	NEIL BARNES Energy Officer nbarnes@sedgefield.gov.uk	At Sedgefield, we are actually planning to undertake a renewables feasibility study in the very near future to pinpoint and highlight opportunities and resources of renewable energy in the Borough.
Cambridge		Expression of Interest