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Renewable Energy Foundation Response to:

***DCLG Consultation on PPS: Planning for a Low Carbon
Future in a Changing Climate***

01 June 2010

About The Renewable Energy Foundation

The Renewable Energy Foundation is a registered research and education charity encouraging the development of renewable energy and energy conservation whilst emphasising that such development must be governed by the fundamental principles of sustainability. REF is supported by private donation and has no political affiliation or corporate membership. In pursuit of its principal goals, REF highlights the need for an overall energy policy that is balanced, ecologically sensitive, and effective.

Summary

1. The change in Government means that events have overtaken this consultation exercise. The scrapping of Regional Strategies means that this draft policy will need substantial revision. We welcome this because we believe there are serious deficiencies in the draft policy which actively militate against the policy achieving either support by local communities or verifiable reduction in CO₂ emissions.
2. In our opinion, the consultation exercise is defective because the policy incorporates material which is not yet available,¹ incorporates another policy which is under consultation therefore insufficient for a meaningful consultation response,² and fails to incorporate technical guidance which has yet to be produced.³
3. The new Government's Coalition Programme states *'wherever possible, we want people to call the shots over decisions that affect their lives.'* This draft policy runs contrary to this aspiration, and the consultation exercise seems explicitly designed to discourage community participation in the making of policy.
4. Consultations have become exercises of Byzantine complexity. This draft policy is a supplement to replace a three-year-old policy supplement and coalesce it with the standalone Renewable Energy policy statement PPS22. It is backed up with two ARUP studies of 516 pages as well as a list of Acts, Directives, Strategies, Plans, Programmes and Incentives comprising many hundreds of pages.
5. One of our major concerns is the disproportionate and increasing policy support for on-shore wind farms. Contrary to received wisdom, substantial permissions for unbuilt wind farms are stacked up. Planning permissions for twice the installed capacity of all UK wind

¹ See paragraph 29 in this document

² See paragraph 8 in this document

³ See paragraph 9,10 in this document

farms ever built exist (approximately 3400 turbines). Another two times the installed capacity is in planning.⁴

6. As is documented in the Arup report⁵ on-shore wind farms, of all renewable technologies, are often the most contentious. Some local communities feel very bitter that they have no say in the location of developments which can blight their landscape, devalue their homes and even affect their ability to sleep given the unreasonably high noise levels permitted under current guidance. It is our firm opinion that this draft policy needs to be revised such that any application for a renewable energy installation must have proved that it has the informed support of the local community most affected by it, and thus, that *'neighbourhoods can truly determine the shape of the places in which their inhabitants live'*.⁶

General Comments

7. In constructing this response, we have concentrated on the ultimate aim of the policy and, thus, considered whether the policy will deliver a verifiable reduction in CO₂ emissions. Does it do what it intends to do or are there unintended consequences of this policy which will result in it failing to deliver a verifiable reduction in CO₂?

Practice Guidance

8. We note that there is no practice guidance in the draft PPS, excepting for wind farms which is covered by a footnote requiring compliance with the National Policy Statement on Renewable Energy, which is as yet unpublished. This is completely unacceptable for several reasons. (i) There is insufficient information in the draft NPS to correctly assess or mitigate impacts. (ii) Some of the information in the draft NPS concerning impacts is demonstrably incorrect, for example, the material on shadow flicker and noise assessment, as REF has noted in its response to the NPS consultation. (iii) The NPSs were not issued for

⁴ Source BWEA <http://www.bwea.com/ukwed/index.asp>

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www.communities.gov.uk/publications/planningandbuilding/takeupresearch?view=Standard

⁶ Coalition Programme Section 4

consultation with this use in mind; indeed it was believed by most that they would only apply to developments which are 50 MW or larger. (iv) The final version of the NPS has not been published so it is impossible in this consultation to comment meaningfully on the ramifications of the edict enshrined in Footnote 23.

9. In any case, it is stated in this consultation document (p12 para 22) that new practice guidance will be produced which will replace the *Companion Guide to PPS22*. It is unclear whether this practice guidance will be the same as the guidance in NPS EN3.
10. We believe that the *Companion Guide to PPS22* was not subject to a proper public consultation with the consequence that technical errors have crept into that guidance. We would expect, although it is not clear, that any replacement guidance is properly put out for public consultation.

Purpose of a this new Supplement

11. We have reservations about how this PPS fits in with the existing Planning Policy Statements. It apparently replaces two existing documents: the supplement to PPS1 entitled *Planning and Climate Change* and the standalone PPS22 *Renewable Energy* which were written in 2007 and 2004 respectively. It is designed to be a new supplement to PPS1: *Delivering Sustainable Development*.
12. The fact that the previous supplement, as well as PPS22 is considered out-of-date so soon after their introduction suggests that more care is needed in the drafting of new policies to ensure greater longevity. Planning policies should be accessible, straightforward and as self-contained as is possible. Supplements, revisions and other changes always incur costs and significantly disadvantage the general public.
13. We note that the evidence underpinning the need for this replacement PPS includes two ARUP studies of 516 pages as well as a list of Acts, Directives, Strategies, Plans, Programmes and Incentives (Page 7, para 3) comprising many hundreds of pages of material. By surrounding consultations with such vast volumes of documents, some

of which are difficult to trace, alienates and excludes all but the most dedicated of consultees. This is surely not the intention.

Comments on the Individual Plan Making Policies

LCF1: Evidence Base for Plan Making

14. LCF1.3. The track record of identifying renewable energy potential and target guidance is very poor. The MW capacity targets in the Regional Spatial Strategies drove deployment of technologies regardless of intrinsic resource, and in any case the MW metric is not compatible with the fundamental RO and EU RES targets, which are for energy (MWh). In any case, we assume that this section will require rewriting following the scrapping of regional authorities.

LCF 2: Regional Planning Approach

15. **LCF2.2 Renewable Energy Targets.** REF doubts the wisdom of setting renewable energy targets in local plans (and indeed the now-defunct regional plans) since establishing meaningful area-specific targets is technically demanding and beyond the resources of local authorities to deliver. Indeed, it is questionable whether national government can set targets that deliver value for money to the subsidising consumer and are not counterproductive in their impact on the renewables industry. In any case, monitoring delivery against these targets is technically demanding and expensive. It is unreasonable to expect local authorities to carry out such investigations against the backdrop of evolving technology and ever-changing support mechanisms for different technologies.
16. We believe that targets, if necessary at all, should be set and monitored at a national level. However, we question the necessity of targets of any kind since the Renewables Obligation and Feed-In Tariff support mechanisms are quite sufficient to generate proposals within the planning system without any further, and potentially distorting, encouraging structure.
17. It is suggested in the PPS that 'targets should be expressed as the minimum amount of installed capacity in megawatts'. Such guidance is technically incompetent, indeed irrational, both since it may encourage

suboptimal technology deployment, but also because it is not compatible with the fundamental targets (at UK and EU level), which are in MWhs. Capacity targets encourage the construction of generation, but not the generation of energy, and it is theoretically possible that the MW target would be met while no energy at all was generated.

18. What is quite possible, indeed is actually occurring, is that capacity is constructed in locations where the wind resource is sub-optimal. We see from our data that UK wind farm load factors vary from approximately 54% down to 10%, and the installed capacity in MW of the lowest yielding wind farm may be the same as that of the highest yielding wind farm and thus count equally toward meeting a MW target. Of course, it is delivering significantly less electricity and thus, achieving a significantly lower saving of CO₂ emissions.
19. The fundamental target derives from the UK commitment to source 15% of its **energy** from renewable sources by 2020 in compliance with the EU Directive 2009/28/EC. Megawatt hours (MWh) is a unit of **energy**; megawatts (MW), the unit proposed in the draft policy, is not. This is a straight-forward error, and should be corrected.
20. Furthermore, this is even internally inconsistent. Policy LCF7.4 correctly identifies that energy generation needs to be expressed in Kilowatt hours (KWh) not Kilowatts (KW).
21. In summary, if LCF2.2 is left intact it will mislead planners and cause the system to fail to deliver on its fundamental principles. That is to say that MW targets will distort the balancing of benefit and disbenefit since planners are required to use a metric of benefit (MW) that does not measure the actual benefit as delivered (MWhs). Indeed, since wind delivers no firm capacity,⁷ MWs of wind can be regarded rather as a measure of the management *problems* that such a wind fleet poses to the grid system, rather than its benefit.

⁷ <http://www.nationalgrid.com/NR/rdonlyres/5FF2C880-F66C-4D4F-8060-E6FFA177ED8D/41157/NETSSQSSWindIndustryWorkshop10May2010FINAL.pdf>

22. REF is also opposed to the statement that 'targets should be treated as minima and not maxima'. It is unreasonable that a region or district could meet a renewable energy target only to have that target revised upwards. The corollary of such a policy is that there is no incentive for the local community to propose or embrace less intrusive renewable energy solutions appropriate to their local area. They correctly feel that whatever they propose will not be accepted as a viable alternative to more intrusive solutions, such as wind farms, but will be considered as an extra source of renewable energy.
23. The impact of the unreachable targets proposed is that those districts which have enthusiastically accepted wind farms find that developers disproportionately favour that district with applications with a concomitant degradation of the landscape. An illustration of this phenomenon is Fenland District in Cambridgeshire.

LCF4: Renewable and low carbon energy and associated infrastructure

24. We foresee difficulties in implementing LCF4 and LCF14 because both sections appear to cover similar but not identical ground. If the two sections are intended to cover distinct issues, it is by no means clear in the draft.
25. We believe the wording of LCF4.ii.a, *'provide appropriate safeguards, so that any adverse impacts are addressed satisfactorily but do not preclude the development of specific technologies other than in the most exceptional circumstances'* is contradictory and thus, meaningless. If adverse impacts cannot be addressed satisfactorily, a development should be refused. We would anticipate that the suggested wording will be interpreted as meaning impacts only have to be addressed in exceptional circumstances, or only exceptional impacts have to be addressed.

LCF6: Selecting sites for new development

26. REF believes that district heating has significant but underdeveloped potential for reducing CO₂ emissions so supports LCF6.1.ii.

27. Similarly, LCF6.1.iv is a good point which could be expanded. For example, the importance of preserving peat bogs as a significant carbon sink ought to be explicitly stated.

LCF7: Setting requirements for using decentralised energy in new development

28. LCF7.1 Decentralised generation is poorly defined so commenting meaningfully on sections referring to decentralised generation is difficult. Most wind farms are embedded in the local 11kV or 33 kV grid systems but most of the energy generated is flushed back up the grid system to the national level. Is this considered decentralised generation?
29. LCF7.2 includes a reference to Annex A (assumed to be Annex 1) defining the 'allowable solutions' necessary to comply with the concept of a zero carbon home. We note that these 'allowable solutions' have not yet been identified and thus are not part of the consultation process. We believe it would be unreasonable to include something in the final PPS which was not subject to the consultation process.
30. LCF7.5 prevents local authorities from considering the environmental costs and impacts of feed-stock transportation for bioenergy installations. If the aim of the policy is to reduce global CO₂ emissions, then such considerations are material and should not be excluded.

LCF8: Setting authority-wide targets for using decentralised energy in new development

31. This policy permits the setting of authority-wide targets for decentralised energy in new developments and is contingent upon tests in LCF11, which in turn depends on the pace and supply of housing development and costs thereof. In view of the Coalition's decision to return decisions on housing supply to local authorities and the current economic downturn, it is difficult to see the relevance or usefulness of this policy.

LCF10: Electric and plug-in hybrid vehicles

32. We understand the desire to encourage the development of the infrastructure necessary to support electric and hybrid vehicles.

However, we believe the policy should include the need to demonstrate that such infrastructure will actually deliver CO₂ emissions savings and within a reasonable time frame. The recent study by the Royal Academy of Engineering⁸ makes it plain that electric vehicles will only be clean when grid electricity is clean. The study cites the example of an electric vehicle having a CO₂ emissions-rating of 100g/km compared with a diesel Volkswagen Polo with a rating of 91g/km. Thus, policy which drives in electric vehicles may paradoxically result in dirtier transport.

LCF12: General approach

33. LCF12. The tone of this section appears to encourage the belief that a minimal analysis of any impact of developments is desirable. This does not appear to support the intent of the EU Environmental Impact Assessment Directive which takes precedence over local policy. This directive requires that the public likely to be affected by, or having an interest in, environmental decisions are entitled to be informed and involved such that they can participate effectively in environmental decision making.

LCF14: Renewable and low carbon energy generation

34. LCF14.1. We fail to see the usefulness of this section. Renewable energy applications are subject to specific planning rules and timetables which this policy cannot alter.
35. LCF14.2.i. Footnote 23 singles out wind farms in particular and appears to state that the assessment of adverse impacts, including noise should comply with the draft National Policy Statement on Renewable Energy. This is completely unacceptable for several reasons. (i) There is insufficient information in the draft NPS to correctly assess or mitigate impacts. (ii) Some of the information in the draft NPS concerning impacts is demonstrably incorrect, for example, the material on shadow flicker and noise assessment, as REF has noted in its response to the NPS consultation. (iii) The NPSs were not issued for consultation with this use in mind; indeed it was

⁸ http://www.raeng.org.uk/news/publications/list/reports/Electric_Vehicles.pdf

believed by most that they would only apply to developments which are 50 MW or larger. (iv) The final version of the NPS has not been published so it is impossible in this consultation to comment meaningfully on the ramifications of the edict enshrined in Footnote 23.

36. 14.2.ii. Unlike PPS22, there appears to be no requirement to demonstrate the benefits of a particular renewable energy installation although weight is to be given to the benefits. How much weight is impossible to say without requiring quantification of the benefits. This omission in the policy needs to be rectified.
37. 14.2.iv. This section apparently prevents a local authority from questioning why a renewable energy generator must be sited in a particular location. This is unreasonable and should be removed. An example of the consequence of such a policy is that a developer is not obliged to ensure developments are as far from neighbours as the development site reasonably allows. Thus, although the local authority may wish to minimise the impacts of a development on neighbouring properties by ensuring maximum separation distances, they would not be permitted to do so. Indeed PPS22 did permit local authorities to set minimum separation distances between dwellings and renewable energy generators. It appears that this privilege is being removed in this draft which is unacceptable.
38. 14.2.v REF is opposed to targets being limitless as previously discussed.
39. LCF14.2.vi. The points about relying on the as-yet unpublished NPS apply here as well. Until the NPS is complete, we are unable to comment meaningfully on the impact of the statement at this point which is contrary to the accepted consultation guidance.
40. LCF14.2.viii. This section states that the wider environmental benefits associated with renewable energy may be considered justification for building electricity generators on green belts. We disagree with this position. There is a wide range of renewable energy solutions of varying scale that would suit brown-field sites. We believe these should

take priority over building on green belts, which are a highly valued national asset.