

ODPM Consultation on Draft New Planning Policy Statement 22 (PPS22): Renewable Energy

Response by the UK Business Council for Sustainable Energy

The Council welcomes the opportunity to comment on the draft planning policy statement 22 (PPS22) for renewable energy and commends the ODPM for the work they have done to develop the new guidance.

The Council brings together major businesses in the renewables, energy efficiency and Combined Heat and Power industry and is working to build a broad consensus on many of the issues surrounding the development of sustainable energy in the UK. Business supporters of the Council include: RWE Innogy, Powergen UK, Scottish Power, Scottish and Southern Energy, Shell UK, United Utilities, Centrica, and National Grid Transco.

Overall we believe that the draft statement is a significant step forward on the previous, outdated guidance (PPG22). It is a more positive statement than the existing guidance and we believe it will, if implemented, improve the process of getting planning approval for renewable energy projects.

Whilst welcoming the draft statement and the clarity it brings to the planning process for renewable energy there are a number of issues that we wish to highlight.

1. The scope of PPS 22 should be widened to include consideration of issues relating to the use of **micro-generation (renewable energy and CHP) in developments**. A number of initiatives to develop policies along these lines are already underway in a variety of Local Authorities throughout England and we strongly believe that PPS 22 should support these developments.

The Council believes that the best way to deliver this support and incorporate the Government's Energy White Paper commitment 4.31¹ is for PPS 22 to **clarify that local authorities may, and are encouraged to, develop policies that specify that a proportion of the expected energy requirements of large new commercial or residential developments are required to come from renewable heat and power generation or CHP.** Using this form of words should give the necessary guidance Local Authorities need without prolonging the finalisation of PPS 22 through the need for further consultation.

2. The blanket disqualification of combined heat and power from the scope of PPS22 raises concerns that renewable (or low-carbon) heat generation is not being given equal weight to renewable electricity generation. Where combined heat and power projects are fuelled by renewable resources they must be considered in the same category as other renewable energy generation. (It is also desirable that planners are enabled to promote this market for biomass where it can benefit the local rural economy).

Policies promoting on-site generation should give a much-needed boost to community and domestic gas-fired CHP, which can achieve significant carbon savings and shares the advantages of renewable generation as a means of engaging businesses and householders in co-production of energy. The Council therefore believes **that conventional CHP should be within the scope of positive planning policies, so that on-site low-carbon energy generation can be promoted in a coherent manner, without undue separation of CHP from micro-renewables.**

3. The consultation document makes no reference to the infrastructure that maybe needed to deliver the energy from renewable energy projects.

It is the Council's view that much of the renewables development needed to meet the Government's targets will be in areas where the existing networks will need upgrading or completely new networks will need to be built. This is likely to raise their own set of planning concerns.

In some cases, and in particular where the proposal involves the construction of overhead lines, the relevant Local Planning Authority must be consulted. If a Local Planning Authority (LPA) objects to a proposal it is likely to result in a public inquiry which may take years to conclude severely delaying the development of the corresponding renewable energy project.

There is no real guidance in existence to help Local Planning Authorities

¹ The Government made a welcome commitment in the Energy White Paper to examine "how to bring consideration of the use of renewables and energy efficiency in developments more within the scope of the planning system, in the context of the review of PPG22 and the Government's wider planning reforms, and in a way that does not impose undue burdens on developers"(para 4.31)

make informed decisions about the need to facilitate the development of the associated infrastructure. There is a joint circular covering overhead lines from the Department of Environment (Circular 14/90), Department of Energy (Circular 20/90) and Welsh Office (Circular 1/90) covering published in 1990 , but this is out-dated and gives little information other than the process to be followed. It also fails to reflect the Governments White Paper objectives, which clearly post date the guidelines.

It is the Council's view that the associated networks should not be considered as separate to the 'generation plant' but included as part of the whole renewable energy project.

At the very least PPS22 should make reference to the issue of networks with more detail about the context and the need to consider the development of networks at the same time as the renewable energy plant. The existing circular should be up-dated as soon as possible.

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