

Draft Revised RPG8 Response Form

1. Please complete your personal details in Section A.
2. Indicate which sections you wish to comment on in Section B.
3. Summarise your comments in Section C – please keep your comments brief and to the point to ensure they are fully taken into account.

Please note that all response forms will be made available for the public to read. If you supply any additional material please send two copies. Please type or write clearly. Photocopies may be made if continuation sheets are necessary or the form can be downloaded from the EMRLGA and GOEM websites.

Please return this form to the address overleaf to arrive no later than **5pm on 30 June 2003**.

Section A

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Section B

Please indicate which of the proposed changes you have comments on below and set them out overleaf in Section C.

- | | |
|--|---|
| <input type="checkbox"/> A: Background (Section 1) | <input type="checkbox"/> J: Economy & Regeneration (Section 4.2) |
| <input type="checkbox"/> B: Core Strategy (Section 2) | <input type="checkbox"/> K: Natural/Cultural Resources (Section 4.3) |
| <input type="checkbox"/> C: Spatial Strategy (Sections 3.1 & 3.2) | <input type="checkbox"/> L: Minerals/Waste (Section 4.3) |
| <input type="checkbox"/> D: Eastern Sub-area (Section 3.3) | <input type="checkbox"/> M: Energy (Section 4.3) |
| <input type="checkbox"/> E: Northern Sub-area (Section 3.3) | <input type="checkbox"/> N: Transport Strategy (Section 4.4) |
| <input type="checkbox"/> F: Peak Sub-area (Section 3.3) | <input type="checkbox"/> O: Monitoring & Review (Section 4.5) |
| <input type="checkbox"/> G: Southern Sub-area (Section 3.3) | <input type="checkbox"/> P: Targets for Biodiversity (Appendix 3) |
| <input type="checkbox"/> H: Three Cities Sub-area (Section 3.3) | <input type="checkbox"/> Q: Renewable Energy (Appendix 4) |
| <input type="checkbox"/> I: Housing (Section 4.1) | <input type="checkbox"/> R: Transport Investment (Appendix 6) |
| | <input type="checkbox"/> S: Core Indicators (Appendix 7) |

Section C

Use this space to make your comments and specify clearly which paragraph/policy numbers they refer to. Please make clear how you would like to see the revised RPG changed to overcome your objection.

BWEA Response to East Midlands Regional Planning Guidance Review

The British Wind Energy Association (BWEA) welcomes the opportunity to respond to this RPG review and provides this submission on behalf of the UK wind energy industry.

BWEA was established in 1978 and is the representative body for companies active in the UK wind energy market. Its membership has grown rapidly over recent years and now stands at 250 companies, including 98.8% of all grid-connected wind energy now installed and every company with a lease to develop offshore (see our online Company Directory at www.bwea.com/members/GenericList.asp).

Wind energy is widely recognised as an abundant energy resource indigenous to the UK and has long been identified, most recently in the Government's Energy White Paper published in February, as the largest contributor to the renewables generation mix in 2010 and therefore the target of 10% of electricity supply from renewables, and again for the aspiration that 20% of the UK's electricity supply be met by renewables by 2020.

In representing the wind industry, BWEA is therefore in a unique position to comment on the circumstances which affect the future growth and development of the sector. BWEA would be pleased to clarify any issues raised and offer any further information which may be required.

Chris Tomlinson
Head of Onshore
BWEA

BWEA welcomes the opportunity to respond to this consultation and would like to make the following specific points, given in relation to Policy number:

Para 2.4.1: A sequential Approach to Development Form

BWEA firmly believes that sequential testing would be unworkable and damaging to the renewables industry and to the Government objectives for renewable energy. If the objective of RPG8 is '*facilitate the delivery of the indicative [East Midlands] targets for renewable energy*' then Para 2.4.1 is likely to do precisely the opposite. A narrow sequential approach which may be appropriate for housing is not so apt for renewable energy because:

- Renewable energy development, and particularly wind energy, does not use land in the same way as proposals for building. Our land usage is minimal and the development is reversible. Therefore the greenfield/brownfield considerations which apply to building development are not sensible indicators of sustainability or acceptability. Wind turbines do not generate the scale of necessary transport movements that residential, retail and office uses do.
- Renewable energy developers will never be able to compete in the market for brownfield sites which attract a premium precisely because of the advice in documents such as PPG3 on Housing. The land values for brownfield sites are high and rising. In addition, brownfield sites are more likely to lie close to centres of population and as such may lead to residential amenity considerations.
- Sequential approaches assume a negative impact of development on more rural landscapes, yet for wind turbine development this is contrary to the significant majority of public opinion nationwide.

BWEA recommends that Para 2.4.1 is amended to include clear reference to wind energy as an exception to the sequential approach to development form.

Policy 4.3.53 – 4.3.57: Regional Priorities for Renewable Energy

BWEA broadly welcomes the introductory paragraphs to the issue of renewable energy. However, the wind industry is concerned at the proposal for distributing these targets down to a sub-regional / local level as indicated in ***paragraph 4.3.55***. This may result in a fair redistribution of the entire regional target across numerous local planning authorities, but in-so-doing will provide more opportunity to threaten the achievement of the collective regional target. There are simply more opportunities to fail and no incentives to over achieve.

Local planning authorities do not always have the expertise or experience of wind power technology to know the full range of requirements for site development, and therefore are not in a position to calculate an appropriate target. While LPA's are likely to take into account designated areas and population, they will not know what makes a suitable site for wind farm development. Outside of the more specific planning related considerations, developers must take into account: radar coverage; telecommunications links; bird breeding and feeding patterns; grid access; wind speeds; site access etc. LPA's cannot be expected, and do not have the required

resources to make such calculations. The issue of site specific wind speeds alone often requires the use of anemometer masts for over 12 months.

BWEA recommends removal of reference to local targets. There is no need to provide targets at a local level, so long as positive local planning policies for renewable energy are incorporated into local plan reviews. This will allow the wind industry to formulate appropriate proposals and collectively meet the regional target.

Paragraph 4.3.56 introduces the broad locations for onshore wind energy development that are based on landscape character and visual amenity. This issue is dealt with in two parts.

Firstly, any reference to landscape character and visual amenity infers that wind turbines produce a negative impact on the landscape for the observer. This is an entirely subjective assessment. The vast majority of the population (over 80%) find wind farms do not deter from the quality of the landscape, and indeed find them 'beautiful and elegant'.

The only means of providing an accurate planning assessment of landscape is to use the designations that already exist. BWEA would suggest the plan policy follows that contained in NPPG6 in Scotland (para 22), which looks likely to be repeated in PPS22 in England. This states that renewable energy developments should be considered '*where it can be demonstrated that the objectives of the designation and the overall integrity of the area will not be compromised*'. Therefore the developer can be given the opportunity to ensure that their renewable energy proposals do not detrimentally affect the special character of the designation.

The policy of broad areas itself actually leads to a presumption against development outside these areas and history tells us that applications being assessed in identified areas are still subject to the same rigorous planning assessment once a proposal is submitted. The identified sites may be most appropriate in terms of planning considerations, but may not be economically viable and would lead to regional renewable energy targets being threatened. There is no need for broad areas to be refined as there are too many considerations to make for the appropriate siting of wind farm developments and local planning authorities often have neither the expertise nor the resources to calculate them. In addition to which circumstances change much faster than development plans, and zoning strategies would rapidly become out of date.

BWEA have found that the best policy approach for local plans is to include dedicated criteria based planning policies for renewable energy rather than identifying areas on a map. This mechanism provides a clear guidance tool to developers in identifying sites. The developer in consultation with the local community is in the best position to identify appropriate sites that are both economically viable and which meet the criteria based policies specified in structure and local plans.

BWEA recommends removing any map based identification of broad areas of search for wind farm development. BWEA recommends replacing them

with dedicated criteria based policies upon which proposals can be assessed.

Policy 40: Regional Priorities for Renewable Energy

The first sentence should be more positive to reflect Government policy contained in the Energy White Paper (para 4.30).

BWEA recommend that the first sentence of Policy 40 should be amended to read: '*Development Plans should include policies to promote and encourage the delivery of the indicative targets for renewable energy...*'.

Refer to comments above on paragraph 4.3.56: broad locations for wind energy.

The reference to consideration of '*cumulative impact of new development*' is misleading and vague. The term impact suggests a negative, whereas this is again purely subjective and judgement can only be made in the eye of the beholder. Further questions are easily raised: What constitutes cumulative effect? What is the required distance between wind farms? Does topography and vegetation (forestry) not provide for variation in approach? Do the sightlines to and from different points not lead to variable effects? Equally, in the appropriate area (for example, one with no dwellings or landscape designations), it may be appropriate and advisable to have a larger number of wind farms.

BWEA recommends that the wording be changed to consider 'cumulative effect'. BWEA also recommend further modelling of what constitutes cumulative effect is conducted before such a policy can be used in structure and local plans.

Appendix 4: Regional Renewable Energy Targets:

As a target the original 122MW onshore is not very challenging. It does not take account of the vast opportunities provided by the wind resource, or the significant economic benefits from wind energy development which are already being seen in the region. DeWind are operating a factory in Loughborough providing **400 jobs** for the East Midlands Region. BWEA are aware of other companies looking to engage in a similar venture in Peterborough.

Wind turbine technology has evolved considerably over the last 2 years, to the extent that turbines being sought for planning permission are now regularly between 2MW and 3MW capacity. The proposed onshore wind target therefore equates to little more than 50 turbines for the whole of the region, which does not reflect the vast potential of the region.

BWEA recommends that with the increased capacity provided by technological gains, there appears to be room for doubling the onshore wind target in the region to nearly 250MW. Following repowering of existing sites, this will lead to just 100 turbines across the entire region. Furthermore, in order to retain the jobs created and expand business, the industry will require sustained growth in the 'home' market. An increase in the target will serve to provide this security and opportunity for future

investors and job creation. There should be clear reference to the targets being minimal and that upon being achieved, they should not be used as a reason to look unfavourably at wind farm proposals, moreover as an indication of the need to revise the targets.

Please reply to:

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