

# Questions for the Options for Consultation on the Regional Spatial Strategy – Renewable Energy – Broad Locations/Criteria

## Introduction

This questionnaire has been made available in this format to enable you to think about or discuss your responses off line. Your comments can be recorded by completing SECTION 3 of this document. Please return to the consultation web site to up-load your final answers or post your responses to:

## North West Plan Partial Review

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## Section 1: Issues to be addressed

What are the key issues that need to be considered for the Partial Review?

### 1.1. Issues within the topic area

European legislation, government targets, increasing energy demand, security of supply, the need for reductions in carbon emissions and rising public expectations are driving the need for rapid changes in the UK's approach to energy generation.

Existing European legislation is enshrined principally in the Directive on the Promotion of Electricity from Renewable Energy Sources in the Internal Electricity Market (2001/77/EC), also called the Renewables Directive, which requires each country to commit to specific targets for renewable energy.

The Government's Energy White Paper and subsequent Energy Bill, alongside the Climate Change Bill set out a framework to reduce carbon dioxide emissions and secure clean and affordable energy supplies.

The North West Sustainable Energy Strategy<sup>1</sup> sets out clearly that the energy challenge, which faces the North West (as a major producer and consumer of all forms of energy) is that if we keep using energy at the same rate our energy demand will continue to rise. More importantly, it demonstrates how different sectors across the region can act to address this challenge head on by adopting

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<sup>1</sup> North West Sustainable Energy Strategy, NWRA, NWDA, GONW & Environment Agency (July 2006)

sustainable energy practices which include energy efficiency, deploying renewable energy technologies and advancing sustainable transport solutions.

Planning Policy Statement 22 (PPS22) sets out the need for Regional Spatial Strategies to contain three elements to its policy framework for renewable energy:

Targets (regional which may be disaggregated to sub-regional levels) based on a region's assessment of its renewable energy resource;

Criteria based policies relating to the identification of types of location or technologies and the scale of development;

Locational considerations including the use of criteria to identify broad areas at the regional/sub-regional level where development of particular types of renewable energy may be appropriate.

Draft RSS policy EM17 sets out a criteria-based approach and targets for the region for renewable energy development. However, RSS may need to include a diagrammatical representation of broad areas where the development of particular types of renewable energy may be appropriate, in line with the EIP Panel recommendations<sup>2</sup>.

The Assembly commissioned research in December 2007 to inform the further development of policy in the Partial Review. The specific renewable energy technologies under consideration are:

- Wind (offshore and onshore)
- Solar (photovoltaic, passive solar design and water heating)
- Water (wave, tidal and hydro)
- Biomass (co-firing, waste, crops and wood)
- Geothermal (hot rock and heat pumps)

The research will provide an assessment of future energy demand and the progress against renewable energy targets; recommendations for any changes to the criteria currently contained within RSS; and identification of potential broad areas for various renewable energy technologies.

## **1.2. Links with other policy areas and any cross-cutting themes that should be considered.**

### Links with other policy areas being reviewed in the Partial Review

The consideration of housing provision will require a significant input from renewable energy sources to assist in achieving targets for zero carbon rated new dwellings by 2016. The Partial Review will need to respond to the recent publication by Government of the updated Code for Sustainable Homes<sup>3</sup> which will provide a national impetus towards meeting the 2016 target.

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<sup>2</sup> See Panel Recommendation R8.15

<sup>3</sup> The Code for Sustainable Homes: Setting the standard in sustainability for new homes, DCLG (February 2008)

There are also links with the waste policy issues being dealt with in the Partial Review including the potential contribution from energy from waste as part of the renewable energy mix. The current draft RSS includes indicative targets (see Table 9.6 in the Proposed Changes to RSS (March 2008)) for the contribution from energy from waste schemes.

In terms of the energy policies contained in the current draft RSS, policy EM17 sets out the framework for targets, sub-regional studies, and criteria to be applied in assessing proposals and schemes for renewable energy development. It is expected that some amendment to this policy may be required.

#### Links with other policy areas not covered in the Partial Review.

The Proposed Changes to RSS (March 2008) include the following policies that are linked to the renewable energy broad locations options:

- EM15 – A Framework for Sustainable Energy in the North West: the policy provides the wider framework for considering energy issues within the region.
- EM16 – Energy Conservation & Efficiency: the policy seeks reduce energy consumption and improve energy efficiency including specific reference to the Code for Sustainable Homes.
- EM18 – Decentralised Energy Supply: Although no specific targets are included in the policy in terms of renewable energy requirements, the proposed policy does advocate the setting of targets for renewable energy supply to be used in new development in future plans and strategies where appropriate evidence and/or viability studies have been produced.

#### Links to cross cutting themes which are the key spatial principles set out in the Panel Report (i.e. policies DP1 to DP8)

- DP7 - Promote Environmental Quality: the development of renewable energy will impact on almost all of the aspects of environmental quality specified in this policy
- DP9 – Reduce Emissions and Adapt to Climate Change: the policy includes direct reference to renewable energy.

#### Links to other regional strategies.

The North West Climate Change Action Plan (2006) includes commitments to increase the uptake of renewable energy generation within the 27 Actions identified in the plan.

The North West Sustainable Energy Strategy (2006) includes an annex that deals with renewable energy and sets out the targets for 2010, 2015 and 2020 that have been incorporated in policy EM17 of the Proposed Changes to RSS.

## **Section 2: What has been decided**

What parts of the policy/policies do we propose to keep unchanged in the Partial Review?

The bulk of the policy framework for renewable energy contained in the proposed changes will remain unchanged in the Partial Review. The intention is to supplement policy which may be through the introduction of a diagram(s) that will set out broad locations for various renewable energy technologies. It may be necessary to amend policy EM17 in the Proposed Changes to RSS dependent on the recommendations for criteria that emerge from the current regional study on broad locations.

Any national, other regional or sub-regional issues where decisions have been taken or are expected soon that need to be flagged up in the options consultation?

Parts of the region have already undertaken considerable work on assessing the potential for various aspects of renewable energy. The current regional level research being undertaken on broad locations is drawing upon existing studies whilst considering them within the context of relevant planning guidance that has emerged since their publication (e.g. PPS1 Climate Change supplement). The research will also supplement existing studies that can assist in the consideration of the broad locations particularly in parts of the region where information has not been produced.

## **Section 3: Options for Consultation**

What are the options that need to be consulted upon in the Partial Review?

The central theme to any of the options that come forward is the need for a policy approach that sets out broad locations or areas for various renewable energy technologies including a diagrammatic representation, where appropriate, of the locations/areas selected (see paragraph 7 of PPS22 and paragraphs 3.37 and 3.38 of the Companion Guide to PPS22).

The research currently being conducted for the Assembly is developing an assessment of the 'theoretical maximum' potential for renewable energy and heat generation by 2020. An alternative 'pragmatic' potential level of renewable energy generation has also been developed, reflecting an assessment of the actual likelihood of various renewable energy technologies coming forward by 2020.

The research also provides recommendations for the types of policy that may need to be considered in the Partial Review.

- Region wide policies building on Policy EM17;

- Sub-regional policies which could set out the potential appropriate technologies by sub-region and highlight specific matters that would need to be considered within each sub-region. The degree of spatial detail that can be provided needs to be considered (i.e. what level of detail will be included in any policy framework given that the Proposed Changes focuses at the moment at county level, save for a column covering Warrington and Halton); and
- The inclusion of broad areas where appropriate for a particular renewable energy technology. There needs to be careful consideration of which types of renewable energy can be included within a criteria/broad locations diagram format. PPS22 states that RSSs should contain an indication of the output that offshore renewables might be expected to achieve, based on where the electricity comes ashore (the actual location of offshore facilities falls outside the remit of an RSS). The draft RSS does contain an indication of the output from offshore wind, tidal and wave in Tables 11.6 and 11.7 a-c.

The two main options that sit around that central theme can be summarised as follows:

**Locational Option 1:**

Development of an approach that follows the ‘theoretical maximum’ assessment set out in the accompanying evidence base.

**Question 1**

1.1. Do you agree with the above option?

- Yes (go to 1.1a)
- In part (go to 1.1c)
- No (go to 1.1b)
- Don’t know (go to 1.1c)

1.1a. If so why?

1.1b. If not, why not?

1.1c. Please explain your answer to Question 1.1?

1.2. What other policy changes are required to RSS to deliver this option and why?

1.3. In taking forward this option, what are the implications for:

A) Delivery?

B) Infrastructure provision?

C) Community and social issues?

D) Environment?

E) Economy?

**Locational Option 2:**

Development of an approach that follows the 'pragmatic' assessment set out in the accompanying evidence base.

**Question 2**

2.1. Do you agree with the above option?

- Yes (go to 2.1a)
- In part (go to 2.1c)
- No (go to 2.1b)
- Don't know (go to 2.1c)

2.1a. If so why?

2.1b. If not, why not?

2.1c. Please explain your answer to Question 2.1?

2.2. What other policy changes are required to RSS to deliver this option and why?

2.3. In taking forward this option, what are the implications for:

A) Delivery?

B) Infrastructure provision?

C) Community and social issues?

D) Environment?

E) Economy?

**Section 4: Sustainability Appraisal/ Habitats Regulations Assessment/ Equalities Impact Assessment/ Health Impact Assessment/ Rural Proofing considerations**

In addition to broad locations for renewables, the RSS should produce targets for regions using resource assessments and criteria-based policies in line with PPS22. Variability will exist between regions based upon feasibility and suitability of each renewable.

The location of renewable facilities, e.g. wind farms or biomass crops, could have environmental impacts on local biodiversity and ecosystem function and also cause a visual impact.

Decentralised energy generation may reduce the need for centralised energy generation, both from fossil fuels and renewables.

Renewables should reduce carbon dioxide emissions and secure clean and affordable energy supplies. The emissions-saving and affordability credentials of renewables could be lost if careful consideration is not given to location in relation to how the energy from the renewables option will be transported to where it is needed. Consideration needs to be given to both onsite generation, e.g. for local community energy schemes, or offsite generation that will need grid connection? Will there be transmission losses? If biomass is an option the sourcing of feedstock will be a significant aspect to its sustainability.

Consideration needs to be given as to the multiple strands of energy policy and the implications of divergent policy on the energy demand of the RSS as a whole.

In doing so the Partial Review will need to take consider specific aspects of the following documents.

| <b>Key Objectives Relevant to Partial Review</b> | <b>Implications for Plan</b>   |
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| <b>EU Biofuels Directive</b>                     | RSS may consider biofuel production as part of its renewable obligations. Careful thought will be need to establish the true impacts of using biofuels as a 'renewable' given the implications on SCP, biodiversity and climate change (through energy balance). |
| <b>EU Directive on the energy</b>                | Revisions to the Building Regulations will create additional energy  |

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| <b>performance of buildings.</b>   | savings not anticipated in the original RSS which may have implications for Energy Demand and extent of Renewable Energy capacity needed.  |
| <b>Energy white paper: meeting the energy challenge (May 2007)<sup>4</sup></b>   | Renewable options will need to reflect the aims of the energy white paper in particular ensuring that the targets are contributed to through the North West region's provision of renewable energy.  |
| <b>The Energy Challenge, Energy Review Report (July 2006)<sup>5</sup></b>  | Options generated in the Partial Review regarding renewables will need to reflect Government targets and integrate holistically with the other RSS policies and other demands of the energy strategy.  |
| <b>Planning White Paper</b>  | Sets out a series of 'challenges' faced by the planning system including: <ul style="list-style-type: none"> <li>~ Meeting the challenge of climate change;</li> <li>~ Supporting sustainable economic development;</li> <li>~ Increasing the supply of housing;</li> <li>~ Protecting and enhancing the environment and natural resources;</li> <li>~ Improving local and national infrastructure; and</li> <li>~ Maintaining security of energy supply.</li> </ul> |
| <b>PPS1 Supplement: Planning and Climate Change (2007)</b>   | Need to consider the likely performance of the RSS on mitigating climate change and in adapting to the impacts of likely changes to the climate.   |
| <b>PPS9: Biodiversity and Geological Conservation (August 2005)</b>  | The increased spatial scope of the Partial Review means that there will be increased accuracy as to where impacts will be felt for waste, renewables and housing.  |
| <b>Our Energy Challenge: power from the people. Microgeneration Strategy (March 2006)</b>                                  | Increased renewables through microgeneration may reduce the overall energy burden in the North West thus reducing the overall requirement for Renewables   |
| <b>Nuclear Decommissioning Agency Strategy – Draft for Consultation, Nuclear Decommissioning Agency, August 2005</b>       | With these facilities being decommissioned within the lifetime of the RSS there will be greater need for other energy resources to ensure energy security.   |
| <b>The Agenda for Growth – The Regional Forestry Framework for the North West (2005)</b>                                   | Renewable energy production may utilise biomass. If the biomass is to be source locally to avoid transport CO <sub>2</sub> emissions then this will have implications for options and policy.  |
| <b>Rising to the Challenge: A Climate Change Action Plan for England's Northwest 2007 – 09 (November 2006)<sup>6</sup></b> | Need to consider how address the priorities for action, the vision for the region, outcomes and monitoring indicators for reducing the impacts of the region on climate change.  |
| <b>North West Sustainable Energy Strategy (July 2006)<sup>7</sup></b>  | Need to support implementation of strategy   |

<sup>4</sup> DTI (2007) *Energy white paper: meeting the energy challenge*. Available from: <http://www.dti.gov.uk/energy/whitepaper/page39534.html>

<sup>5</sup> DTI (2006) *The Energy Challenge: Energy Review*. Available from: <http://www.berr.gov.uk/files/file31890.pdf>

<sup>6</sup> NWRDA (2006) *Rising to the Challenge: A Climate Change Action Plan for England's Northwest*. Available from: <http://www.nwda.co.uk/areas-of-work/business/sustainable-consumption/climate-change.aspx>

<sup>7</sup> NWRA (2006) *North West Sustainable Energy Strategy*. Available from: [http://www.nwra.gov.uk/downloads/documents/aug\\_06/nwra\\_1156410969\\_North\\_West\\_Sustainable\\_Energy\\_.pdf](http://www.nwra.gov.uk/downloads/documents/aug_06/nwra_1156410969_North_West_Sustainable_Energy_.pdf)