

Planning For Renewable Energy:

Implementing PPS22 - Guidance for Preparing Renewable Energy Planning Policies in Development Plan Documents

The purpose of the guide

Climate change is now accepted by government as one of the most pressing problems facing society. The planning system has a crucial role to play in helping the UK combat the threat and adapt to its now inevitable impacts. Energy generation emits around a third of the UK's CO₂ emissions and so increasing the proportion of energy supplied by renewable sources is a vital component of an effective climate change strategy.

Local authorities have an invaluable role to play in ensuring that targets and objectives for the development of renewable energy are met. This will require action and partnerships across departments and amongst stakeholders. However, provision of robust and objective policies in development plans (Regional Spatial Strategies and Local Development Frameworks) will ensure that there is an effective statutory framework in place from which well-informed and consistent decisions can be made.

This guidance has been prepared by the TCPA¹ and outlines the policy requirements, and key issues that need to be considered by local planning authorities (LPAs) when preparing policies for renewable energy. It also provides some working examples to illustrate key points and to demonstrate how particular issues can be addressed.

The guide draws heavily on government policy, con-

Box 1: UK emissions reduction targets

The government has agreed a number of targets to reduce releases of greenhouse gases:

- As part of the Kyoto Protocol, reduce greenhouse gas emissions by 12.5% below 1990 levels by 2012.
- Reduce CO₂ emissions by 20% from a 1990 baseline by the year 2010.
- Reduce CO₂ emissions 'by some 60% by about 2050'.
- In March 2005 EU Heads of State agreed greenhouse gases must be reduced by 15-30% by 2020 from 1990 levels.
- Produce 10% of energy from renewable sources by 2010 and 15% by 2015, with an aspiration of 20% by 2020.

tained in PPS22 (Renewable Energy) and guidance, but aims to present it in an accessible format. While the guide remains within the confines of government policy, planners should be ambitious in pushing the boundaries and becoming leaders in their pursuit of renewable energy and carbon emission reductions.

Further advice aimed at development control officers and elected members will be prepared shortly.

1. Planning policy framework

As well as setting targets, the government has sought to address climate change through a number of policy initiatives. Tackling climate change is identified as a priority in Planning Policy Statement (PPS) 1: Delivering Sustainable Development; with further reference in PPS7: Sustainable Development in Rural Areas; PPS9: Biodiversity and Geological Conservation; PPS11: Regional Spatial Strategies; PPS22: Renewable Energy; PPS23: Planning and Pollution Control; and forthcoming PPS25: Development and Flood Risk.

PPS1 makes clear that "regional planning bodies and local planning authorities should ensure that development plans contribute to global sustainability by addressing the causes and potential impacts of climate change." (para 13ii). More specifically, paragraph 13i of PPS1 states, "Development plans should ensure that sustainable development is pursued in an integrated manner, in line with the principles for sustainable development set out in the UK strategy."

Current national planning policy on renewable energy is set out in PPS22, which is also accompanied by technical guidance in a Companion Guide 'Planning for Renewable Energy'. As part of a broader framework for delivering renewable energy through the

planning system, it calls for positive planning policies at regional and local levels, encouraging the use of the full range of available renewable resources. It requires targets to be expressed as the minimum amount of installed capacity for renewable energy in the region (and sub-region where appropriate), and emphasises that targets must not be regarded as a ceiling for development; rather they should be reviewed regularly and revised upwards as they are achieved, or become close to being achieved.

2. Renewable energy policies in Development Plan Documents

Compliance with PPS22 should enable renewable energy policies to be cascaded from the regional to local level. Whilst the regional level will provide much of the strategic framework, at the local level, LPAs should tailor planning policies to reflect local circumstances.

Box 2 sets out key issues in planning for renewables at the local level. Local policies in Development Plan Documents (DPDs) should not duplicate what is already written in higher level policy (PPS or RSS). Rather they should add value, focussing on meeting regionally set targets, locally specific issues, and

Box 2: Key issues in planning for renewables at the local level

- The introduction of the spatial planning approach within the new system provides an important opportunity for integrating renewable energy generation into the wider local planning framework;
- LPAs should prepare criteria-based policies that focus on key local issues, within the framework set out by national planning policy and the RSS, or Spatial Development Strategy in London. Policies may relate to standalone schemes and/or the development of integrated renewables within developments;
- SPDs can be useful in illustrating how particular types of technology, or passive solar design principles, can be applied in the particular local context;
- Some LPAs have set specific targets for on-site generation; it may be appropriate for other authorities to do the same, and this should be considered by policy-makers;
- LPAs have the scope to demonstrate practical support for renewable energy through their procurement strategies; and
- LPAs should encourage community involvement in planning for renewable energy, through consultation exercises during plan-making and also, where possible, by supporting appropriate community-led development proposals.

Source: PPS22 Companion Guide, para. 4.6

Box 3: Government advice on standalone schemes

It is important that the full range of technologies is considered, even though the Regional Spatial Strategy may have identified only one or two of the most likely sources in the short to medium term (i.e. by 2010). Development proposals may come forward for other types of schemes and local policies should also be applicable to them.

Any policy should begin with a statement of general support for renewables. It is usual to then list the issues that will be taken into account in considering specific applications:

- There should be reference to impact on landscape, townscape, natural, historical and cultural features and areas;
- There should be specific reference to the impacts on the amenity of the area (or particular sub-areas within it) in relation to visual intrusion, noise, dust, odour and traffic generation; and
- Consideration should be given to the wider environmental, economic and social benefits of renewable energy developments.

Source: paragraphs 4.10-4.11, PPS22 Companion Guide

how they should be addressed. PPS22 requires planning policy at a local level to provide guidance in relation to both standalone renewable energy schemes and the integration of renewable energy into new development. It is therefore likely that there will be two different policy areas in the plan to cover these issues.

Renewable energy policies should be contained within the Core Strategy to clarify the importance of addressing the sustainability objectives established by the LPA (Chapter 4 of the Companion Guide to PPS22 covers these issues in more detail). However, more detailed policies may also be included within separate DPDs. For example, in a Sustainable Energy DPD encompassing renewable energy and energy efficiency, or within a Development Control DPD. The decision as to what is most appropriate will depend upon local circumstances.

LPAs may want to prepare Supplementary Planning Documents (SPDs) on renewable energy and design. While these cannot introduce new policy, they can elaborate on the policies and proposals in DPDs. The PPS22 Companion Guide suggests that SPD might include: design guidance, referring to topics such as passive solar design or building integrated renewables²; and site development briefs.

2.1 Standalone renewable energy schemes

Any policy should begin with a statement of general support for renewables. Box 3 sets out government advice and Box 4 includes examples of wording in emerging LDF Core Strategies. A commentary on the particular wording is also given to assist LPAs in developing strong and effective policies of their own.

Wording similar to that set out below meets the requirements of PPS22, but may need to be adapted to meet the area's specific needs.

'Renewable energy proposals will be supported throughout the plan area unless they would have unacceptable adverse effects which are not outweighed by local and wider environmental, economic, social and other considerations of the development. This includes wider benefits arising from clean energy supply, reductions in greenhouse gas and other polluting emissions, and contributions towards meeting regional and national targets for use of renewable energy sources.'

2.2 Integration in new development

On-site renewable energy generation can provide an

important contribution to renewable energy targets (heat, cooling and power). The Companion Guide to PPS22 says that 'a general policy could be included in the Core Strategy, with reference to a separate SPD. The latter would explore how different technologies could be integrated into the design of development or enabled for future fitting through, for instance, orientation of development (Para 4.12). There are a variety of technologies that can be applied at a small scale including solar, biomass, and domestic wind turbines.

The Companion Guide goes on to say that LPAs should take into account the following considerations:

- policies should encourage developers to consider a range of renewable energy technologies on their sites (but should not specify which technologies to use on named sites - this is too prescriptive);

- policies should be flexible: not all technologies are appropriate on all sites and locational constraints should be borne in mind (for example, any requirement for connection to the electricity distribution network);
- policies should not place undue burdens on developers: local authorities should be mindful of the level of development pressure in their area in setting generation targets; and
- authorities may wish to lead by example and install schemes at their own premises or develop 'private wire' networks in town centres - this can encourage neighbouring developers to follow suit and there may be advantages in developing a local distribution network. (para. 4.14)

Research by the London Borough of Merton sug-

Box 4: Criteria-based policies for stand-alone renewable energy schemes

South Cambridgeshire Council

Policy NE/2 Renewable Energy - The District Council will grant planning permission for proposals to generate energy from renewable sources, subject to proposals according with the development principles set out in DP/1 (Sustainable Development), DP/2 (Design of New Development), DP/3 (Development Criteria), and DP/4 (Infrastructure and New Developments) and complying with the following criteria:

1. The proposal can be efficiently connected to existing national grid infrastructure;
2. The proposal makes provision for the removal of the facilities and reinstatement of the site, should the facilities cease to be operational.

Author's comment: the policy refers to more general planning principles contained in the Core Strategy, meaning that less detail may be necessary in policies such as this. Representations submitted to this draft policy criticised criteria 1 on the basis that it precludes on-site generation, non-grid connected infrastructure, district heating and private wire networks. Re-wording would overcome this.

<http://egov.scambs.gov.uk/ldf/representation.php?docid=64&chapter=3#3373>

London Borough of Merton

Policy PE.12: Energy generation and energy saving - Proposals for development of facilities that generate energy locally, in particular renewable energy and those that reduce the use of energy and its transmission, will be permitted provided that: there is no demonstrable harm on visual or residential amenities or by way of pollution generation, or it can be demonstrated that benefits contributing to diverse and sustainable energy supplies and to reducing greenhouse effects will outweigh harm arising from the development.

www.merton.gov.uk/udpprotectionenv.pdf

Author's comment: Within the context of integrating renewables in a new development, this policy provides useful criteria and significantly requires the benefits of carbon savings to be weighed against any impacts.

gests that if 250 LPAs in England implemented a similar on-site generation policy for commercial and residential developments in their LDFs it would create a market of around £750 million per annum for solar PV, solar thermal, and micro-wind. The current market is around £30 million³. 80 local authorities have now been identified as having adopted, or considering adopting, prescriptive renewable energy planning policies in their UDP, local plan or LDF.

Those policies requiring on-site generation have generally opted for a figure of 10 per cent; however there

is no reason why a higher figure cannot be adopted. The London Borough of Merton, the originator of this policy, based the figure on achieving 10 per cent through an estimated 3 per cent increase in capital costs. This may vary around the country and also as the capital cost of technologies continues to drop.

Based on experience around the country, the following wording options should be considered (see Box 5 for further discussion):

'All non-residential or mixed use developments

Box 5: Building integrated renewable energy policy

London Borough of Croydon

Second Deposit Draft Replacement UDP, November 2003 Policy EP23 - The Council will encourage the development of renewable energy facilities subject to any environmental issues being satisfactorily resolved. All proposals for development of uses that consume energy should include renewable energy facilities and/or energy saving technologies whenever possible (for example combined Heat and Power systems, solar water heating systems and photovoltaic cells). The Council will expect all development (either new build or conversion) with a floor space of 1000m² or more or ten or more residential units to incorporate renewable energy production equipment to provide at least 10% of the predicted energy requirements (see UD2 - Building form and design).

www.croydon.gov.uk/environment/dcande/UDP/DCP/depdraft2?a=5441

Author's comment: The policy is worded so that it 'expects' incorporation of renewable energy technologies, whereas PPS22 is written so as to allow policies to 'require' their incorporation. Using the word 'require' would result in a much stronger policy. The policy mentions national and London-wide targets for energy generation in the supporting text.

South Cambridgeshire Council

Policy NE/3 Renewable Energy Technologies in New Development All development proposals greater than 1,000 m² or 10 dwellings will include technology for renewable energy to provide at least 10% of their predicted energy requirements, in accordance with Policy NE/2 (Renewable Energy).

<http://egov.scamb.gov.uk/ldf/representation.php?docid=64&chapter=3#4756>

Revision 2020, Proposed South West RSS renewable energy policies"

All developments will include a proportion of their energy from renewable sources. Major developments will be expected to provide, as a minimum, sufficient on-site renewable energy to reduce carbon dioxide emissions from energy use on-site by 10%. Proposals for major developments must be accompanied by an energy use assessment which sets the baseline for the calculation of the proportion of on site generation and describes the measures that are being taken to put the "Energy Hierarchy" into effect.

www.oursouthwest.com/revision2020/core-policies-final-210605.pdf

Author's comment: the above policies set thresholds and percentage targets. Where possible, these should be seen as minimums. Experiences in the London Boroughs of Merton and Croydon shows that developers are embracing the targets and do not see them as over burdensome. Targets should be ratcheted up over time to reflect the need to address climate change.

(new build or conversion) above a threshold of 1,000m² will be expected to provide at least 10% of their energy requirements from onsite renewable energy generation.

All residential developments (new build or conversion) of 10 or more units) will be expected to provide at least 10 per cent of their energy requirements from onsite renewable energy generation.'

The percentage and threshold are indicative. While these may be set lower, the pressing urgency of combating climate change is a crucial material consideration, as set out in PPS1, and so the aim should be for the highest percentage possible.

In some cases policies refer to reducing CO₂ emissions rather than meeting predicted energy demand. This helps set the policy within an overall climate change or emission reduction strategy. For example:

'The Council will expect all development (new build, conversion, or refurbishment) with a floor-space of 1,000m² or ten or more residential units, to incorporate renewable energy production equipment to reduce the overall CO₂ emissions by at least 10 per cent.'

The aim should be for all new developments to be built to net zero carbon standards, by maximising the energy efficiency of buildings (and appliances) and ensuring that any residual energy demand is met from new renewable energy capacity, either from within or outside the development area. As a minimum standard, local planning policy should drive for improvements in building performance of at least 20 per cent above whatever current building regulations require by setting targets for on-site renewable energy generation and energy efficiency measures, to maximise carbon emissions savings. This will make an important contribution not only to renewables targets but to reducing the carbon footprint of new development.

3. Other relevant policy issues to comply with PPS22

In accordance with PPS22, local authorities should prepare criteria-based policies that focus on key local issues and reflect local circumstances, within the framework set out by national planning policy and the RSS. This offers local authorities an opportunity to tailor-make their policies, ensuring that all aspects, and features, of their local area are considered.

Set out below are examples of issues that will need to be considered by LPAs in order to comply with PPS22, but that may well be covered in other policies. PPS22 sets out policy on these, and its Companion Guide gives more detailed technical advice. The list is not exhaustive and it is the responsibility of the local authority to draw out those issues which are specific to their local area, and apply the guidance accordingly.

3.1 Impacts on residential and natural amenity

Renewable energy developments can give rise to a number of impacts, the type and extent of which will vary depending on the nature and scale of the proposed development and its location. Positive effects of development might include increased security and reliability of supply, job creation, tourism potential, educational opportunities and the management of existing environments, in addition to the resulting reductions in CO₂ emissions. However, effects such as noise, emissions (from manufacturing processes, and transportation), and increased traffic flow could have a negative impact on people or wildlife.

3.2 Objectives of international and national designations

Development in internationally designated sites should only be granted permission once an assessment has shown that the integrity of the site would not be adversely affected. If adverse effects are likely, planning permission should only be granted "where there is no alternative solution and there are imperative reasons of overriding public interest, including those of a social or economic nature" (PPS22, Para 10).

For nationally designated sites, criteria-based policies in regional and local strategies should "set out the circumstances in which particular types and sizes of renewable energy developments will be acceptable. Small-scale developments should be permitted within areas such as National Parks, AONBs and Heritage Coasts provided that there is no significant environmental detriment to the area concerned". (PPS22, para1)

3.3 Cultural heritage

Special care will be needed if proposed sites are near listed buildings, conservation areas, ancient monuments and nationally scheduled archaeological sites. The approach to developing renewable energy schemes in or near such areas should follow advice given in PPS22, PPG16 (Archaeology and planning), and PPG15 (Planning and the historic environment).

3.4 Nature conservation

In accordance with PPS22, planning permission should only be granted for development within nationally designated Conservation Areas where it can be demonstrated that the objectives of the designation will not be compromised, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the benefits of development. The outcome of Environmental Impact Assessment will be used to consider potential impacts. Consideration should be given to the requirements of the Habitats Regulations and those of PPS9 and accompanying circular.

3.5 Landscape character and visual amenity

Policies should reflect the overriding climate change imperative and renewable energy targets. Landscape change is inevitable, though the magnitude of change can be lessened through appropriate siting, design, and landscape schemes. Ultimately however, the degree of visual impact is subjective. To assist with the decision-making process, a growing number of councils, including Breckland and West Norfolk District Councils⁴ and Huntingdon District Council, have prepared a character assessment of the local landscapes and their capacity to accommodate wind

turbines⁵. Some councils have employed consultants to carry out Landscape Character Assessment⁶ or similar studies to feed into SPDs.

3.6 Cumulative impact and wind farms

A large number of wind energy developments within a given area may lead to cumulative effects on views, the landscape, and habitats. These impacts will need to be assessed when an application is submitted. This is usually carried out as part of the environmental Impact Assessment process, but planning policies will need to give consideration to cumulative landscape, visual and ecological effects.

Notes

- 1 Assisted by a steering group comprising: BWEA RPA, SWRDA, Y&H Assembly, CEN, RegenSW, Renewables East, Bond Pearce, NPower Renewables, LGA, Impetus Consulting, and the Planning Inspectorate.
- 2 TCPA (2006) 'Sustainable Energy by Design: a guide for sustainable communities' provides further detail on this.
- 3 www.merton.gov.uk
- 4 ldf@s-norfolk.gov.uk www.south-norfolk.gov.uk/south-norfolk%5Ccouncil.nsf/pages/consultationdetails.html?OpenDocument&Start=1&Count=1000&ExpandView
- 5 'Wind Turbine Development, Landscape Assessment, Evaluation and guidance' www.breckland.gov.uk
- 6 www.countryside.gov.uk/LAR/Landscape/CC/index.asp

The following organisations have contributed to the preparation of this guidance:

- Bond Pearce
www.bondpearce.co.uk
- British Wind Energy Association
www.bwea.com
- Creative Environmental Networks
www.cen.org.uk
- Impetus Consulting
impetusconsult.co.uk
- LGA
www.lga.gov.uk/
- London Borough of Merton
www.merton.gov.uk
- NPower Renewables
www.npower-renewables.com
- RegenSW
<http://www.regensw.co.uk/>
- Renewables East
<http://www.renewableseast.org.uk/>
- Renewable Energy Association
www.r-p-a.org.uk
- Y&H Assembly
<http://www.yhassembly.gov.uk/index.cfm>

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The Town and Country Planning Association (TCPA) is an independent charity working to improve the art and science of town and country planning. The TCPA puts social justice and the environment at the heart of policy debate and inspires government, industry and campaigners to take a fresh perspective on major issues, including planning policy, housing, regeneration and climate change.

Our objectives are to:

- Secure a decent, well designed home for everyone, in a human-scale environment combining the best features of town and country
- Empower people and communities to influence decisions that affect them
- Improve the planning system in accordance with the principles of sustainable development

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