

**REGIONAL SPATIAL STRATEGY FOR THE SOUTH WEST  
EXAMINATION IN PUBLIC**

**SOUTH WEST REGIONAL ASSEMBLY SUBMISSION**

**MATTER 7/2  
ENERGY AND RENEWABLE TARGETS**

March 2007

In setting out policies for Renewable Energy does the draft RSS set out adequate guidance and in particular

- a) Does the draft RSS properly reflect the requirements of PPS22 in terms of the setting of targets for renewable energy and how should these targets be expressed in the RSS?
- b) Does it provide a justification for linking renewable energy targets with targets for energy efficiency?
- c) Is there clear guidance for stakeholders as to what the target for renewable energy capacity in 2020 is? and
- d) Is the promise of SPD documents an adequate response to paragraph 7 of PPS22, which proposes the development of policies in the RSS to identify broad areas where development of particular types of renewable energy may be considered appropriate?

**Executive Summary**

**In setting out policies for Renewable Energy does the draft RSS set out adequate guidance?**

EX1 The draft RSS sets out clear policies and targets on renewable energy in Policies RE1 to RE5 and is in conformity with the requirements of PPS22. These policies were based on detailed and thorough analysis of the opportunities in the region through the Revision 2010 and Revision 2020 projects.

**A) Does the draft RSS properly reflect the requirements of PPS22 in terms of the setting of targets for renewable energy and how should these targets be expressed in the RSS?**

- A1 Paragraph 3 of PPS22<sup>1</sup> requires that renewable energy targets “should be expressed as the minimum amount of installed capacity for renewable energy in the region, expressed in megawatts, and may also be expressed in terms of percentage of electricity consumed or supplied”. Information Note 8 on energy (SWRA11<sup>2</sup>) sets out the process for developing the targets and policies on renewable energy in the draft RSS. Policy RE1 clearly sets out minimum targets for onsite renewable electricity for 2010 and 2020, expressed in megawatts, based on detailed technical analysis in the Revision 2010 (SWEE 44.01<sup>3</sup>) and Revision 2020 (SWEE 44.02<sup>4</sup>) studies.
- A2 Paragraph 4 of PPS22 states that the RSS “should contain an indication of the output that might be expected to be achieved from offshore renewables”. Policy RE2 sets out offshore renewables targets for 2010 and 2020.
- A3 Policy RE1 also states that the combination of the onshore target in RE1 and offshore target in RE2 will meet “at least 20% of the region’s electricity demand by 2020”.
- A4 Policy RE3 sets out regional targets for renewable heat. In the process of developing the Regional Renewable Energy Strategy and the draft RSS policies, it became clear that there was great potential in the region for the use of renewable heat. Whilst PPS22 is unclear on this area, with inconsistencies in terminology between renewable “energy” and “electricity” it was considered appropriate, given the resources in the region, the high proportion of the region off the gas grid, and the opportunities to reduce carbon emissions through the development of the renewable heat sector, to set clear targets for heat as well as electricity. The resources and opportunities were analysed in the Revision 2020 study.
- A5 Policy RE5 sets out a minimum requirement for building integrated renewable energy as encouraged in PPS22 and required in the draft

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<sup>1</sup> PPS22 Renewable Energy  
[http://www.odpm.gov.uk/pub/910/PlanningPolicyStatement22RenewableEnergyPDF866Kb\\_id1143910.pdf](http://www.odpm.gov.uk/pub/910/PlanningPolicyStatement22RenewableEnergyPDF866Kb_id1143910.pdf)

<sup>2</sup> Information Note 8 Energy  
<http://www.southwesteip.co.uk/downloads/documents/20070207143253.pdf>

<sup>3</sup> Establishing County Sub Regional Targets-Renewable Electricity Development to 2010 Final Report Executive Summary(GOSW & SWRA) (CSMA Consultants)  
<http://www.southwesteip.co.uk/downloads/documents/20061231200853.pdf>

<sup>4</sup> Revision 2020 - South West Renewable Electricity, Heat & On Site Generation Targets for 2020 Final Report (GOSW & SWRA) (Centre for Sustainable Energy)  
<http://www.southwesteip.co.uk/downloads/documents/20070101170958.pdf>

supplement to PPS1 on climate change<sup>5</sup>. The RPB statement on Matter 1/3 on climate change includes a proposal for a modification of the wording of Policy RE5 by replacing the 10% minimum requirement with a minimum requirement relating to 20% of regulated emissions and making a clear link to the proposed wording of Development Policy G. For ease of reference the proposed revised wording of Policy RE5 and supporting text is included at Appendix 1, the proposed new appendix to the draft RSS and addition to the glossary, referred to in supporting text is included in the RPB's statement on Matter 1/3. This change of wording retains the minimum requirement at the same level as the previous wording but improves the ease of implementation and the measurability of the policy by making it consistent with the wording of Development Policy G.

A6 Therefore the RPB does consider that the draft RSS properly reflects the requirement of PPS22 in setting targets and these targets are expressed in the way set out in the PPS.

**B) Does it provide a justification for linking renewable energy targets with targets for energy efficiency?**

B1 The Energy White Paper 2003 (PTEY 11.01<sup>6</sup>) sets out national energy policy, including a national target to generate 10% of UK electricity from renewables by 2010 and an “aspiration to double that to 20% by 2020. These figures are repeated in PPS22 and in the Energy Review 2006 (PTEY 11.03<sup>7</sup>). Paragraph 3 of PPS22 requires that the RSS sets regional targets for 2010 and 2020.

B2 The targets have been set in the draft RSS in Policies RE1, RE2 and RE3 primarily in terms of megawatts of capacity as required by PPS22 paragraph 3. However, PPS22 also states that “targets may also be expressed in terms of percentage of electricity consumed or supplied”<sup>8</sup>.

B3 In order to determine a percentage of demand that a number of megawatts of capacity will meet it is necessary to determine the level of demand at the time. The Revision 2020 (SWEE 44.02<sup>9</sup>) project

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<sup>5</sup> Planning and Climate Change (Supplement to PPS1)

<http://www.southwesteip.co.uk/downloads/documents/20070123122008.pdf>

<sup>6</sup> Energy White Paper: Our Energy Future - Creating a Low Carbon Economy (DTI, 2003)

<http://www.dti.gov.uk/files/file10719.pdf>

<sup>7</sup> Our Energy Challenge - Energy Review Consultation Document

<http://www.northeastep.co.uk/downloads/documents/20060201164416.pdf>

<sup>8</sup> PPS 22 Renewable Energy, p.8

[http://www.odpm.gov.uk/pub/910/PlanningPolicyStatement22RenewableEnergyPDF866Kb\\_id1143910.pdf](http://www.odpm.gov.uk/pub/910/PlanningPolicyStatement22RenewableEnergyPDF866Kb_id1143910.pdf)

<sup>9</sup> Revision 2020 - South West Renewable Electricity, Heat & On Site Generation Targets for 2020 Final Report (GOSW & SWRA) (Centre for Sustainable Energy)

<http://www.southwesteip.co.uk/downloads/documents/20070101170958.pdf>

considered different scenarios for electricity demand in 2020 and concluded that the most appropriate baseline to use was to allow for forecast household growth and to assume the energy efficiency measures set out in the Energy White Paper 2003 were delivered. The proposed renewable electricity capacity would therefore meet 20% of the region's expected demand, in line with the national aspiration. However the Revision 2020 report identified that to meet this 20% figure, it was critical that the energy efficiency assumptions were delivered on. Paragraph 7.3.6 of the draft RSS identifies this risk.

B4 The RPB considers that the approach taken in the draft RSS is in compliance with PPS22 and is the most appropriate one as targets are expressed in megawatts. The RPB considers that where an interpretation of the targets are also set out as a proportion of demand there will clearly be a link to energy efficiency and it does not require detailed justification in the RSS.

**C) Is there clear guidance for stakeholders as to what the target for renewable energy capacity in 2020 is?**

C1 Policy RE1 sets out a regional target for onshore renewable electricity capacity, Policy RE2 sets out a regional target for offshore renewable electricity capacity. Policy RE3 sets out a target for renewable heat capacity.

C2 Renewable electricity targets for 2010 were established through the Revision 2010 project (SWEE44.01<sup>10</sup>). These targets included sub-regional targets agreed and adopted at county level. This project included substantial local consultation and negotiation to reach agreement on the county level targets.

C3 Following publication of PPS22, GOSW and SWRA commissioned the Revision 2020 project<sup>11</sup> to develop the 2020 electricity targets, 2010 and 2020 heat targets and the building integrated renewables requirement. At the time that Revision 2020 was commissioned it was intended to submit the draft RSS in late 2005. This timescale was considered by the steering group (including GOSW, SWRA and RegenSW) as insufficient to undertake the same extensive consultation process on sub-regional targets, and so it was agreed that the targets for 2020 should focus on the regional level. It was considered appropriate to develop 2020 sub-regional targets as part of an early review of the draft RSS.

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<sup>10</sup> Establishing County Sub Regional Targets-Renewable Electricity Development to 2010 Final Report Executive Summary(GOSW & SWRA) (CSMA Consultants)  
<http://www.southwesteip.co.uk/downloads/documents/20061231200853.pdf>

<sup>11</sup> Revision 2020 - South West Renewable Electricity, Heat & On Site Generation Targets for 2020 Final Report (GOSW & SWRA) (Centre for Sustainable Energy)  
<http://www.southwesteip.co.uk/downloads/documents/20070101170958.pdf>

C4 There were also concerns that whilst it was possible to set regional targets for 2020, sub-regional targets would lack robustness due to assumptions about technology options.

C5 The RPB considers that the targets for 2020 are clearly set out in Policies RE1, RE2 and RE3.

**D) Is the promise of SPD documents an adequate response to paragraph 7 of PPS22, which proposes the development of policies in the RSS to identify broad areas where development of particular types of renewable energy may be considered appropriate?**

D1 The identification of broad areas in maps was considered by the consultants and steering group as part of the Revision 2020 process. The production of such maps for particular technologies is suggested in the PPS22 companion guide<sup>12</sup>, but there is no requirement to do so. The relevant resources were mapped during the process and are identified in Revision 2020.

D2 However, given the nature of the wind resource in the region, when taken alongside non-negotiable constraints such as National Parks, AONBS, radar and buildings, there were no broad areas of search which could be identified at that time<sup>13</sup> where it would be clearly appropriate to develop large scale wind developments (e.g. windfarms with more than 50 turbines) and the majority of sites were suitable for smaller numbers (i.e. less than 10 turbines). Such sites are spread across the region and it was considered that a map showing these within the draft RSS would be of little, if any, value.

D3 Maps were also produced in Revision 2020 (pages 89 and 90<sup>14</sup>) of forestry and potential for growing energy crops. Due to the extensive nature of such areas and the ability to transport the biomass, there was generally potential for biomass plants in many areas across the region. Therefore it was considered that a map showing these would also be of little value.

D4 Following the work on Revision 2020, SWRA and GOSW jointly funded the production of the South West Renewable Energy Atlas, a DVD mapping wind and biomass resources and constraints. This is now held by each local authority in the region, following training on its use, and can be used as a tool to help local authorities get a clearer picture of how

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<sup>12</sup> Planning for Renewable Energy: A Companion Guide to PPS22 (ODPM 2006)  
[http://www.communities.gov.uk/pub/915/PlanningforRenewableEnergyACompanionGuidetoPPS22\\_id1143915.pdf](http://www.communities.gov.uk/pub/915/PlanningforRenewableEnergyACompanionGuidetoPPS22_id1143915.pdf)

<sup>13</sup> Changes in constraints or in technology might change this situation in the future.

<sup>14</sup> Revision 2020 - South West Renewable Electricity, Heat & On Site Generation Targets for 2020 Final Report (GOSW & SWRA) (Centre for Sustainable Energy)  
<http://www.southwesteip.co.uk/downloads/documents/20070101170958.pdf>

these technologies can contribute to the achievement of the renewable energy targets.

- D5 Detailed criteria based policies were also considered for the identification of sites. However, it was considered that PPS22 and in particular, the companion guide, provide comprehensive information of criteria and there was insufficient justification to add more detail in the draft RSS other than is included in Policy RE4. However, it was recognised that further detailed guidance might be useful which could be included in a SPD which could be regularly updated as technology and resources develop.

## Appendix 1

### Proposed revised wording for Draft RSS Policy RE5

When meeting carbon reduction requirements in new developments set out in Development Policy G, larger-scale developments will be expected to provide, as a minimum, sufficient on-site renewable energy to reduce CO<sub>2</sub> emissions from energy use by users of the buildings constructed on site by the equivalent of 20% of regulated emissions. Developers will be expected to demonstrate that they have explored all renewable energy options, and designed their developments to incorporate any renewable energy requirements.

### Proposed revised accompanying text:

#### Replace paragraphs 7.3.10 and 7.3.11 with 'Promoting Carbon Reduction and Sustainable Energy Use Within New Development'

7.3.10 PPS22 emphasises the importance of developing positively expressed policies on building integrated renewables, incorporating renewable energy projects in all new developments. The draft Planning and Climate Change supplement to PPS 1 goes further, and requires that local authorities, in the absence of more detailed evidence, should set minimum targets of 10% of total emissions to be saved from on-site renewables.

Policies that encourage the on-site generation of renewable energy must be placed within a wider context of the need for development, both new build and refurbishment, to incorporate the principles of sustainable energy design (see also Section 3, Development Policy G). This will involve reducing building energy demand through energy efficiency and low energy design, before meeting the remaining demand from firstly renewable energy and then fossil fuels or grid electricity.

This approach has been characterised as the 'Energy Hierarchy' within the South West, and will ensure that energy efficiency opportunities are maximised before renewable energy is considered within proposals for new developments. The aim is to achieve affordable energy-efficient homes, so reducing both fuel poverty and CO<sub>2</sub> emissions.

7.3.11 Proposals for larger scale developments (for definition see Glossary) should be accompanied by an **Energy Strategy** which describes how much energy is expected to be used within the proposal, and therefore carbon emissions produced and considers ways in which the 'Energy Hierarchy' can be put into effect. The carbon reduction requirements laid out in the appendix XX to Development Policy G and Policy RE5 have been set based on a detailed analysis of technical viability and costs for different scales and types of development.