



Suffolk Preservation Society

Policy and Position Statement on

Renewable Energy Generation and Energy Conservation

1. Introduction and Background.

1.1 The Government Energy White Paper: “*Our energy future – creating a low carbon economy*”, was published in February, 2003. This puts the UK on a path to a 60% reduction in carbon dioxide emissions by 2050. This target is to be achieved by improving how we use energy and finding alternative sources to fossil fuels. The Government had committed itself at an earlier stage to the target of 10% of UK electricity being produced from renewable sources by 2010. The White Paper confirmed this target, and indicated an aspiration to double the renewable share to 20% by 2020.

2. Policy

2.1 The consultation draft of the Government’s new Planning Policy Statement on Renewables (PPS22) was issued in late 2003. The draft emphasised the Government’s commitment to energy generation through renewable means. It especially highlighted the role of wind farms and urged local authorities in the strongest possible terms to approve wind farms because of their national importance even in environmentally sensitive areas. The final version of PPS22 will guide local planning authorities and developers on this issue.

2.2 The East of England Sustainable Development Round Table (EoESDRT) has adopted a target to meet 14% of the regional demand for energy from renewable resources by 2010, primarily using onshore wind energy and biomass. Their report “*Making Renewable Energy a Reality*” suggests that Suffolk should meet 12% of the county’s energy demand through renewables. This target has been adopted by Suffolk County Council. The 12% target figure for Suffolk equates to nearly 70 wind turbines as in Swaffham, Norfolk or 85 to 110 medium size turbines.

2.3 At the present time there is a lack of strategic guidance on renewable energy generation and decisions are taken on an ad-hoc basis. In addition, there are few, if any, indications of a co-ordinated approach between energy demand, energy generation, energy conservation and the whole issue of sustainability. Proposals for renewable energy generation in Suffolk are now being brought forward for consideration. It is important that the Suffolk Preservation Society has an agreed policy on the subject so that it can comment on these and other proposals which have important implications for energy demand, use and conservation.

3. The Society's Position and Approach.

3.1 The Society has adopted a co-ordinated position and approach to the issue of energy. It supports an approach where energy management, conservation and generation all contribute to the reduction of carbon dioxide emissions.

3.2 Energy Management. It is important that energy demand is the starting point for any policy. If demand is reduced or managed efficiently this will have a significant impact on the need for additional energy generation. No targets have been established, nationally, regionally or in Suffolk on reducing demand through management and this is a concern to the Society. The final version of PPS22 may, when published, contain a statement from the Government on the issue. Until then the Society takes the view that to continue to build renewable energy generation facilities will not in itself deal with the energy problem and may only meet increasing demand.

3.3 Renewable Energy Generation. There is a range of technologies to generate energy using renewable sources and these are:-

- Onshore and offshore wind turbines, mainly in wind farms are currently the most economic renewable technology and there is an increasing emphasis on the role they may play. This in part is due to Government subsidies given at the present time. While economical, wind farms can have significant environmental impact on landscape character. The less obtrusive are community based generation projects often using one turbine and generating power close to the end user, thereby significantly reducing transmission losses and increasing efficiency.
- The EoESDRT suggest that to reach Suffolk's 12% target by 2010 approximately one third could be delivered by biomass technology and energy crops. Short rotation crops have the largest potential to help increase biomass energy production. Short rotation coppicing, a tradition in Suffolk, can use crops such as fast growing willows or poplars. (Growing and burning crops can be greenhouse gas neutral, as long as the re-growth rate balances the use rate so that as much carbon dioxide is absorbed as is produced by combustion.) It is essential that the growing and the burning of energy crops are in close proximity to one another in order to avoid wasted energy through transportation. Generally, local road networks may be sensitive to lorry movements required to remove the end-products. Other effects which need to be considered are the plant buildings which can have a visual impact, but the crop itself may impact upon the landscape character. This technology may use water and other energy consumption which may not be sustainable. (Some form of Biomass technology is already used at Eye Power Station by utilising chicken litter. A further plant has been granted planning permission at Eye Airfield.)
- Water or wave energy has significant potential nationally and, it is estimated, could meet up to 20% or more of the UK electrical requirements.
- Photovoltaics use solar energy to produce electricity while solar panels use it to heat water. The technology is still being developed and tested but may have the potential to make a significant contribution at a later date.

3.4 Energy conservation is a sustainability issue and the Society has a policy of seeking to ensure that all developments in the county are sustainable. Energy conservation is unlikely to have a major impact on the appearance of the environment and can have a more significant impact on reducing carbon dioxide emissions than changes to renewable energy generation. The Government has not responded to requests for energy conservation targets to be set and the Society will have to wait to see if the final version of PPS22 establishes such targets. The Society can however, seek to raise the issue of energy conservation through the planning system in three ways:-

- Securing appropriate policies and guidance in Local Plans/Local Development Frameworks;
- Ensure allocations in Local Plans/Local Development frameworks for new housing, employment and commercial developments are sites in sustainable locations taking into account energy issues; and
- Taking into account energy conservation when commenting on planning applications.

3.5 The Society will, through the CPRE and directly, lobby Government for targets to be set for energy conservation. It will also ask the Government to clarify how the planning system will deal with energy conservation in its entirety. Most of the statutory requirements on energy conservation and insulation are controlled through the Building Regulations and not the planning system. The Society sees it as essential that energy conservation is a formal part of the planning process and is a material consideration when determining development proposals and will press for changes to facilitate this.

3.6 The criteria in sections 4 and 5 of this policy enable the Society to consider the merits or otherwise of individual proposals considered by Councils on an ad hoc basis. The Society's policy is that wind farms should be located and developed on sites identified as potentially suitable following a detailed landscape analysis. Such an analysis would examine sites on a 1 km square basis and assess their suitability for a range of sizes of developments from a single small wind turbine, to a small group of turbines and medium group of turbines, and finally a large wind farm.

4. Detailed Site Considerations

4.1 Often major applications for wind farms are preceded by a proposal for a test turbine in order to establish wind characteristics. These initiate the first step in establishing the precedent of wind turbines on specific sites. Therefore, the Society will apply the detailed considerations below and in section 5 to such applications.

4.2 The Society would prefer any major new or additional renewable energy generation proposals to be located on existing or former power station sites as existing plant or machinery is replaced. This will help utilise existing infrastructure and minimise any additional environmental impact.

4.3 Proposals in, bordering or adjacent to Areas of Outstanding Natural Beauty (AONB), Special Landscape Areas (SLA), The Suffolk Coast and Heaths Project Area, Dedham Vale and Stour Valley Project Area, and Suffolk River Valleys Environmentally Sensitive Areas or other similar important designations will not be considered acceptable.

4.4 Proposals in, on or adjacent to Listed Buildings, Conservation Areas, Historic Parks and Gardens and Scheduled and non-scheduled Ancient Monuments will not be

considered acceptable. This includes proposals which border on or impact upon views from and to conservation areas and historic parks and gardens.

4.5 Proposals in, on, bordering or adjacent to Special Protection Areas, Special Areas of Conservation, Ramsar Sites, Sites of Special Scientific Interest, National and Designated Local Nature Reserves, or similar important designations or of biodiversity significance, will not be considered acceptable.

4.6 Proposals which involve the removal of any tree or trees which are the subject of a Tree Preservation Order or a protected hedgerow will not be considered acceptable.

4.7 Proposals in or within 2 kilometres of rural village churches, villages, rural hamlets and farmsteads or isolated vernacular buildings in the countryside and operational local airfields or landing strips will not be considered acceptable.

4.8 Proposals involving wind turbines up to 95 metres in height and within 1 kilometre of residential properties (in excess of 10 houses), will not normally be considered acceptable.

4.9 Proposals involving wind turbines exceeding 95 metres in height and within 2 kilometres of residential properties (in excess of 10 houses), will not normally be considered acceptable.

4.10 Sustainability issues, environmental, economic and social, are now influencing the allocation of sites for future development in LP's and LDF's. In addition, sustainability is a material consideration when Local Planning Authorities determine all planning applications. The Society will object to proposals which are not considered environmentally sustainable on energy grounds, and will press for comprehensive site-specific Environmental Impact Assessments to be carried out.

5. Detailed Development Considerations

5.1 Proposals for renewable energy generation often involve associated infrastructure works, for example, any energy generated needs to be fed into the national grid. The Society will expect all power lines to connect any new energy generation developments, on-shore or off-shore, to the grid to be placed underground. If proposals incorporate overhead lines, the Society will object to the granting of planning permission.

5.2 New proposals for energy generation will often require service roads for access and maintenance works. The impact of such roads can in some instances be as detrimental as the main proposal. The Society will expect access routes to be designed and located to have minimal impact on any nearby residential development and the environment in general. If this cannot be satisfactorily achieved then the proposal should be rejected.

5.3 The Society will request that a condition be attached to all planning permissions for wind farms requiring the land to be returned and reinstated to its former use immediately following decommissioning and removal of the wind turbines at the end of their operational lives.

5.4 The Society supports the incorporation of measures both to reduce energy consumption and to conserve energy. The layout and density of buildings, their design and the materials used in their construction, can all have a significant impact on the amount of energy consumed during their use. Therefore, the principals of energy conservation need to be introduced and incorporated at the earliest stage into all development proposals regardless of the end use or location. This holistic approach should include: building orientation; insulation levels; using, where appropriate, materials

to maximise solar gain; avoiding overshadowing; and designing positive natural ventilation, all of which should be an integral and integrated part of good design and not mar the appearance of any building. Landscape design, including tree planting schemes, may also be used as a positive element, e.g. to shelter buildings and decrease heat loss. Proposals which do not include measures both to reduce energy consumption and conserve energy will not be supported by the Society and are likely to be the subject of an objection to the granting of planning permission.

5.5 In circumstances where planning permission has been granted for a wind farm but not implemented, the Society will seek a commitment from the local planning authority that a principle for all other forms of development has not been established.

6. Conclusion

6.1 The Society considers that proposed national policies to minimise the impact of climate change and increase UK electricity generating capacity from renewable energy technology could seriously damage the essence of the countryside, and particularly its open character, landscape and tranquillity. Not enough is being done to conserve energy and reduce consumption.

6.2 The Government has a responsibility to protect both the planet and our countryside and we should not have to choose between global and local environment. The guidance in sections 4 and 5 of this policy seeks to achieve the right balance for Suffolk.

END

Richard Ward Dip.TP, M.R.T.P.I.
Director
Suffolk Preservation Society