



SCOTTISHPOWER RENEWABLES

Mr Geoff Cave
Leicestershire County Council
County Hall
Glenfield
Leicester
LE3 8RA

07/05/2010
Our Ref: Quen/0023
Your Ref: 2009/2464/02

Dear Mr Cave,

Response to the report of the Chief Executive consultation on planning application 2009/2464/02: ScottishPower Renewables - Erection of four 126.5 high wind turbines and ancillary infrastructure for a period of 25 years.

Our response is as follows:

1. The main issue from the report and recommendations from the planning perspective relates to the text on the targets issue. It is a matter of surprise and regret that the County Council's grasp of the targets issue is deficient in terms of what the actual targets are for the region, how they are to be achieved and the national advice which relates to the setting and achievement of targets. **The conclusion that the benefits do not outweigh the harm that they perceive will arise therefore comes from an entirely false assumption about the way that the balancing exercise is carried out.**
2. The table at Appendix 5 in the Regional Planning Guidance published in March 2009 indicated that at 2006, the installed capacity of the region was only 116MW (54MW of this being onshore wind) against a target for 2010 of 324MW. The plan had given an indicative breakdown by technologies as to how this figure might be reached, suggesting that 122MW of it could come from onshore wind. However, it needs to be noted that PPS22 advises against a reliance on technology sub-targets since opportunities can change so rapidly as advancements are made. All proposals need to be tested against the regional target as a whole and not the sub-targets that have been postulated.

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3. The figure in the RPG 2009 for 2020, based on the intention to reach 20% of the region's electricity consumption from renewables by that date, was to increase the total for the region by more than ten fold to 3671MW of installed capacity, largely as a result of a very substantial introduction of micro-generation, where the output against the installed capacity is very much lower – hence the high figure for installed capacity. Onshore wind in commercial scale developments was suggested as providing at least 175MW of the 2020 target. However again this is not some form of cap and all proposals have to be tested against the regional figure as a whole. On the basis of the latest Renewable Energy Strategy figures published in July 2009, the figure for each region would be expected to be raised to 30% figure of electricity consumption in the region from renewable sources and hence increase the regional target by a further 50% from the figures in the current RPG.

4. However, it does need to be stressed again that PPS22 argues against any rigid adherence to targets through technology sub-divisions in view of the uncertainties about how different technologies will evolve. The RPG 2009 figures for the East Midlands for 2020 were anticipating that some 89% of the figure needed to reach 20% of their electricity consumption from renewables would come from micro-generation of wind and photovoltaics which is out of line with every other region in the country, and suggests that other more established commercial technologies such as onshore wind will in reality have to supply far greater shares of the supply. It also needs to be noted that the figures are intended to reflect grid-connected sources, and in the case of most of the domestic scale projects these do not necessarily connect into the grid at all.

5. The progress towards the 2010 target can be judged in two documents published since the RPG, both of them in June 2009. The first is a report by Faber Maunsell to the East Midlands Regional Assembly on targets, intended to inform the Partial Review of the RPG. This report provided a table for the figures up to “2008/9” which is understood to be at the end of March 2009. This showed a total achievement of 209.8MW for all renewables against the RSS target of 324MW, but the figure includes 25MW which is stated to be renewables heat, and therefore not part of the renewables electricity total. There are also three categories in the table which are both electricity and heat, but not separated out. This is clarified in the Options Report published in June



2009 by EMRA where they refer to Faber Maunsell, and give a figure of 170MW for 2009 as being the electricity renewables total (which takes out the 25MW and a part of the combined heat and electricity categories). The Faber Maunsell Report sets out a series of scenarios looking forward to 2020 and beyond (but still in the context of the then 20% target for 2020, since the RES was not published until July 2009). It emphasises the role that onshore wind is expected to play over the coming years, envisaging that the onshore figure even for 2020 may be three times what is contained in the 2009 RPG.

6. The latest position as regards onshore wind in the region is different from that set out within the report, since it appears not to have noticed that even before the Low Spinney appeal decision to which reference is made in March 2010, there had been another Leicestershire decision for a much larger development at Swinford, also in Harborough District, and for 27.5MW. This takes the figure of built projects, including one under construction to 115.9MW, and consented projects to 107.7MW (including the latest consents at New Albion approved by Kettering Borough in January 2010 and Low Spinney allowed on appeal in March 2010). The combined total of all these projects clearly exceeds the indicative 2020 figure in the RPG of 175MW for onshore wind, but that is not a material factor when set against the major shortfall for all technologies in the region against the 2010 target and the massive increases now required for 2020, which may need onshore wind to contribute many times its 175MW indicative figure.
7. What is again surprising is that the County have not recognised the key national advice in PPS22 on not relying on technology sub-targets. Nowhere in the report is there any mention of what the regional target as a whole is, nor how much progress there has been (or not been) towards achieving that. It is quite frankly a serious red herring to adopt the stance that the targets are all about onshore wind and how close to the sub-target the area has got. Indeed, this can readily be seen in some of the more recent appeal decisions that have been issued. The two ones in Leicestershire itself are a key indicator of the importance of looking at the regional target as a whole and not at the technology sub-target.
8. At Swinford, the Inspector had detailed evidence as to the serious shortfall in the region against the 2010 target, and concluded: (paras 228-230)



“The fact that PPS22 provides that specified RE targets are a minima is not particularly relevant here, where there is a significant shortfall in provision compared with the targets. I concur with Nuon that the need is unconstrained and that RE generation needs to be brought forward wherever it can be, subject to its being acceptable when the overall balance is properly drawn.” (my emphasis)

That approach was endorsed by the Secretary of State in his decision letter.

9. The other very recent local decision involved another site in Harborough District, this time at Low Spinney, several kilometres north of the Swinford site, near the village of Gilmorton. This four turbine scheme was allowed in March 2010 with the Inspector there noting that there was an agreed shortfall against both the 2010 and 2020 targets, even though the indicative onshore wind element could be met, and that the 2020 target is now very likely to be raised significantly upwards as a result of the Renewable Energy Strategy.
10. These two decisions followed one at Derbyshire Dales (Carsington Pastures) in 2008, also in East Midlands Region, which was for four turbines and again was allowed. Here the Inspector did not support the Council's claim that since the **onshore wind target** for the region had been met from committed schemes, that was a material factor. He noted that the region as a whole was performing poorly across all technologies other than wind and that the Panel Report into the EIP of the RPG should be seen as a “wake-up call” stressing the importance of achieving the targets being set.
11. The issue of local or technology sub-targets within a region being met and this being a reason for a local planning authority to resist further wind energy schemes has been debated at length in one particular Council in the neighbouring region of Yorkshire and the Humber. In East Riding, the Council had a sub-sub-regional target for its area and had reached both the 2010 target in terms of installed schemes and the 2020 target in terms of built and consented projects. Yet in the last fifteen months all five wind farm appeals it has contested have been allowed, with the Inspectors and in two cases the Secretary of State agreeing that while it was creditable that the local targets



had been reached these were only an indication of how the regional target could be apportioned to different areas, and no such artificial ceiling could be employed to resist further developments on appropriate sites. In the last of the five appeals, at Sober Hill near Market Weighton, the site also lay inside an AGLV on the Local Plan (the equivalent of the local landscape designation at Queniborough) and the Inspector saw no reason to exclude such areas from the lists of potential areas for wind energy development.

12. The County refer to the Partial Review of the RPG as having been submitted to the Secretary of State in March 2010, and, as they accept, no weight can be given at this stage to a document that has not even been the subject of formal public consultation (which does not take place until June 2010). The remarkable thing about this document, however, is that, as a result of the Faber Maunsell study to which I have already referred, the very high figures for contribution from micro-generation have been deleted from the tables of indicative technology sub-targets. What this does mean is that instead of seeking to achieve 20% of the region's consumption of electricity from renewables by 2020 (the original national target) they would now slip back to only 11.3% by 2020, at a time when the national figure has been raised to almost three times that percentage. What the Panel and the Secretary of State will make of that is impossible to judge, but the harsh reality is that we now have binding European targets to reach which will require contributions from across the UK. The fact that onshore wind is given an indicative target of 400MW of installed capacity by 2031, based on the Faber Maunsell study, serves to show that the capacity is physically there – and indeed the study suggested that even higher figures were feasible. The Partial Review also suggests that unlike some other parts of the region, there are many opportunities for developer led renewables (such as wind farms).

13. As noted in the Planning Statement to the application, the policy on renewables recognises the need for and the urgency of the delivery of renewable energy and the step change which has to be made in attitude in handling planning proposals if the targets are to be met. Failing to understand that the regional targets are for all forms of technology and that the onshore wind element is just an indication of how the targets will be met fatally undermines the findings of this report since the balancing exercise is based on an entirely false premise. No material weight to the targets for the simple reason that the current 2020



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target for onshore wind can be met from built and consented projects. However, as the five recent East Riding decisions and indeed the two now granted in Harborough District (actually in Leicestershire) show, it is the regional target as a whole that has to be met. In this case, the former Regional Assembly's own material shows that the 2010 target in the East Midlands will be missed by a country mile. Even with new projects that may come on stream by the end of 2010, the installed capacity will only be of the order of 190MW against the target of 324MW, which is well under two thirds (actually 58%). It is that figure which has to be addressed – the indicative sub-target for onshore wind is not the benchmark against which decisions have to be made. Indeed, the figures of 122MW and 175MW for 2010 and 2020 respectively were not based on any comprehensive survey work of feasible sites but assumed that much of the region would be unsuitable for commercial wind turbines as the wind speeds were considered to be too low. The advance in turbine technology with the use of much larger and far more powerful machines has revolutionised the potential of whole Counties – precisely the situation anticipated by PPS22 when it said that there should not be any reliance on technology sub-targets.

I hope that our response will be given serious consideration in forming an opinion on this planning application.

Yours sincerely,

Vicki Turkington
Senior Project Manager