

COPELAND BOROUGH COUNCIL: EXAMINATION OF THE COPELAND CORE STRATEGY AND DEVELOPMENT MANAGEMENT POLICIES

WRITTEN STATEMENT PREPARED BY TURLEY ASSOCIATES ON BEHALF OF REG WINDPOWER LTD

HEARING AGENDA MATTER 5: ECONOMIC DEVELOPMENT (ER1 – ER11)

REPRESENTOR NUMBERS: 79

HEARING DATE: 10 APRIL 2013

Introduction

This Statement is provided by Turley Associates (TA) on behalf of REG Windpower Ltd ('REG'). It responds to the questions asked by the Inspector in respect of Matter 5: Economic Development (ER1 – ER11).

The principal question of relevance to REG's previous submission is question 2, which states:

2. *Has appropriate regard been had for the role of renewable energy in contributing to economic activity in Copeland?*

Context

REG have set out previously on page four of their representations to the Regulation 19 Consultation Draft the economic benefits that can be attributed to on-shore wind projects. These statistics are derived from the BiGGAR Economics study, prepared on behalf of the Department of Energy and Climate Change and RenewableUK and clearly demonstrate the significant economic growth benefits renewable energy schemes can deliver both at the local and national level.

Impacts of Renewable Energy Development and the Framework

Whilst it is considered Policy ER2 does not have regard to the economic benefits of renewable energy, REG previously also highlighted that Policy ER2 is currently unsound on the basis that it seeks to support renewable energy generation at locations which *"minimise environmental and amenity impacts."*

REG have set out in their response to questions on Matter 4, why setting a requirement to "minimise" impacts is not in accordance with the Framework. REG would therefore like to take this opportunity to reiterate that that this policy should also be amended to reflect the wording of paragraph 98 of the framework. This confirms that when determining applications

local authorities should, “...approve applications if its impacts are (or can be made) acceptable.” This is a more reasonable test than the one of minimising impacts currently set out, which in the context of this Examination Matter, will only serve to deter renewable energy development and stymie the significant economic benefits this sector may bring to Copeland Borough. REG therefore respectfully request that this wording be amended to reflect the provisions of the Framework.

Economic Benefits and Targets for Renewable Energy

If appropriate regard is to be had for the role of renewable energy in contributing to economic activity in Copeland, it is considered the Council should commit to meeting the capacity target of delivering 46MW from renewable sources by 2030 and that this should be made explicit within the policy.

Paragraph 98 of the Framework is clear that there is no need for applicants for energy development to demonstrate the overall need for renewable or low carbon energy. In accordance with national guidance, it should therefore be made clear that the 46MW target is not a ceiling to delivery of renewable energy within the plan’s timeframe; rather, the significance of seeking to meet the 46MW capacity target should be to serve as a demonstration of the Council’s commitment to delivering renewable energy in the borough over the plan period. With this comes the implicit confirmation of their acknowledgement of the economic benefits such development will bring to the borough.

Presently, paragraphs 4.3.7 – 4.3.9 of the Submission Draft document state that the Local Plan provides a positive framework for renewable energy, but that only an “aspirational target” of 46MW is deemed appropriate. The supporting text in these paragraphs confirms that the Council’s evidence base (the Cumbria Renewable Energy Capacity and Deployment Study) identifies the potential levels of deployment for each technology; however, the reason stated for not committing to meeting the capacity target in the policy is that, “*the development and uptake of newer technologies, such as microgeneration, can be strongly influenced by changes to government policy and funding as well as local priorities.*”

The difficulty with this reasoning is that the deployment study does not actually support this conclusion. Paragraph 8.4 states, “*The Deployment Projections provide the most easily achievable mix as they are based on realistic assumptions concerned with economic viability, supply chain, grid constraints and recent planning acceptance.*” Therefore, while there may be reservations regarding the development and uptake of new technologies in the future which may add to the sources of renewable energy supply, such as microgeneration, the deployment projections are based on realistic assumptions of delivery and capacity, rather than speculation on future government energy policy.

Contrary to the approach adopted by the Council, the deployment study recognises and advocates the economic benefits of renewable energy, stating at paragraph 8.7:

“It is important that climate change and planning officers work closely with economic development colleagues to ensure that maximisation of renewable energy development is seen as central importance to the economy and communities” [sic]

On this basis, there is consequently no justification in the evidence base not to adopt the 46MW capacity target within Policy ER2. Indeed, it is reasonable to conclude that the evidence base provides clear recognition of the economic benefits of renewable energy. Therefore, REG consider that in order for the plan to be ‘positively prepared’ and ‘justified’ and be sound in these respects, Policy ER2 should adopt the wording suggested by REG in their representations on the Regulation 19 draft consultation. This is reproduced below for ease of reference:

“The Council will seek to support and facilitate new renewable energy generation at locations which best maximises renewable energy resources where impacts are (or can be) acceptable. The Council will seek to deliver 46 MW of energy from renewable sources by 2030, but this is not a ceiling to delivery within this timeframe. Criteria on renewable energy development / generation are set out in Policy DM2.”