



Draft National Policy Statements
Department of Energy and Climate Change
Consultation document
response from BT

-

22 February 2010

1 Introduction

- 1.1 British Telecommunications plc (BT) is one of the UK's largest consumers of electricity with a current demand of 2.2 TWh/annum, representing approximately 0.7% of the UK's entire consumption. The company's Corporate Strategy supports its role in meeting national emissions targets by setting a framework to respond to climate change. The company has been active on climate change for many years and has established a corporate strategy for energy and carbon reduction. The company is exploring the viability of renewable energy development at a number of preferred sites across the UK.
- 1.2 Within its overall energy and climate change strategy, BT supports the development of dedicated renewable and low carbon energy supplies. BT's "Wind for Change Project" aims to develop wind farms with the capacity to generate up to 25% of its existing UK electricity requirements by 2016.
- 1.3 ***'Wind For Change' is the UK's biggest corporate wind power project outside of the energy sector. Subject to planning permission, the availability of suitable sites being secured, and any variances in BT's power consumption, BT's wind farms will have a total installed generating capacity of around 250MW targeted by 2016. This would prevent the release of approximately 500,000 tonnes of CO2 each year compared with coal generation.***
- 1.4 BT is therefore interested in presenting its views and comments to the Department of Energy and Climate Change (DECC) as the future policy framework shaping the delivery of renewable energy and its infrastructure will to a large degree be governed by the National Policy Statements.

2 Responses to Consultation

- 2.1 BT's response follows the format of questions provided by DECC and presents its views focussing primarily on the overarching draft National Policy Statement EN-1 and the draft National Policy Statement Renewable Infrastructure EN-3.

1. *Do you think that the Government should formally approve ('designate') the draft Overarching Energy National Policy Statement EN-1?*

Yes. The NPS should aim to deliver a low-carbon society which, in the widest sense, is a global interest. It is therefore an excellent opportunity for the UK Government to send out a global message, being the first to fully incorporate energy policy into national statute and implement it through the statutory planning system.

It is considered however, the NPS sets a heavy reliance on the private sector to deliver the low carbon society aim through infrastructure delivery. The industry needs to develop the technology to keep apace, but despite strong progress, the availability, reliability and affordability of non-wind technology remains limited in scope – i.e. wind is a key energy resource and its technology well advanced, but other sources of renewable energy are not as established. The private sector should thus not be the sole provider, nor sole leader in technological advancement.

As such, BT considers the NPS should be designated, but its content improved to give further clarity on the Government's preferred energy mix. It is clear that wind energy (onshore and offshore) and biomass have the Government's preference, but a longer term vision and ambition should be included in the policy to allow the mix and range of sources to be expanded as the younger technologies mature. The other energy sources, including nuclear

and/or fossil fuel would also be party to the Infrastructure Planning Commission (IPC) and the NPSs. It is therefore considered there is a risk of the Government taking the path of least resistance to delivery if it did not acknowledge a wider scope of renewable sources in the NPS.

The relationship between the NPS and the current Government Planning guidance needs also to be further clarified. This is in relation to the hierarchy of planning guidance, e.g. PPS22 – Renewable Energy, and its inter-relationship with other policy areas.

2. Does the draft Overarching Energy National Policy Statement provide the Infrastructure Planning Commission with the information it needs to reach a decision on whether or not to grant development consent?

The draft statement appears to include guidance on the majority of matters which are considered in applications for wind farms; though this should not be seen as a definitive list due to the unique nature of individual applications. It should be more flexible and responsive to individual / local circumstances. There should be a statement to that effect within the final statement.

3. Does the draft Overarching Energy National Policy Statement provide suitable information to the Infrastructure Planning Commission on the Government's energy and climate policy?

BT supports the conclusions in EN-1 about need – it states: 'the IPC should start its assessment of applications for infrastructure covered by the energy NPS's on the basis that need has been demonstrated'. P14. BT also considers more flexibility should be incorporated into the policy in recognition of geographical locations and local issues relevant to renewable energy developments.

BT is not an energy generation company, but through its "Wind for Change Project" it is considered to be promoting the largest corporate wind power project outside of the energy sector. As such the company takes its environmental and corporate responsibilities seriously and has a duty to help reduce carbon emissions, which is echoed by Government as a need in the national interest.

4. Does the draft Overarching Energy National Policy Statement provide suitable direction to the Infrastructure Planning Commission on the need and urgency for new energy infrastructure?

The draft statement concludes that the IPC should assume that need for renewable energy schemes have been demonstrated. This is supported. BT's Wind for Change project has this philosophy at the core of its programme.

5. Do the assessment principles in the draft Overarching Energy National Policy Statement provide suitable direction to the Infrastructure Planning Commission to inform its decision-making?

Yes, however it should not be seen as an exhaustive list due to the unique nature of planning applications and their individual circumstances. It is important that the IPC have the ability to take into account all relevant planning matters. As locations and circumstances vary across the UK, BT considers careful consideration must be given to assessing sites proposed in

urban/industrial brownfield locations as well as those in rural countryside locations and that they satisfy the criteria listed..

6. *Do you have any comments on any aspect of the draft Overarching Energy National Policy Statement not covered by the previous questions?*

If applications are sped up via the IPC, then this cannot undermine the scrutiny the planning system still allows. Careful assessment and inclusive consultation should remain at the forefront of the process.

It is also clear from the consultation draft, that once approved, the National Policy Statements will take precedence over approved Development Plan policies and emerging Development Plan policies will therefore need to take the Statements into account. This raises a number of issues of transparency and legal probity.

7. *Do you think that the Government should formally approve ('designate'):*
b) The draft National Policy Statement for Renewable Energy Infrastructure (EN-3)?

Yes, however despite a stronger National policy as proposed in NPSs, such as EN-3, it is considered at the local and regional level, where disparities on renewable energy strategies exist across the UK, that National Policy should provide broad consistency and reference particularly in the areas of confirming need and defining the purpose of such projects.

It is BT's view that regional targets for renewables, particularly onshore wind projects, should not be solely regarded as grounds for refusing or approving an application. Regional targets are however important. The capacity that wind energy can contribute to targets at national, regional and local level should carry significant weight, including for projects scrutinised by the IPC.

8. *Does the draft National Policy Statement for Renewable Energy Infrastructure (EN-3) provide the Infrastructure Planning Commission with the information it needs to reach a decision on whether or not to grant development consent:*

BT considers that NPS does not give advice to Local Authorities about what level of weight ought to be attached to applications lower than 50MW. BT would welcome a clearer indication of the expected relationship between NPS' and PPS' with guidance to explain how NPS' to be considered and interpreted for non-IPC (i.e. less than 50mw) applications.

BT is also interested to understand how cumulative impacts will be considered where concurrent applications are being determined by IPC/Planning Inspectorate and Local Authority.

BT notes that Local Planning Authorities will become consultees to the IPC when processing applications exceeding 50MW. This may raise issues of local accountability and the ability to have meaningful negotiations between the developer, the Local Planning Authority and the local community. In the experience of BT these relationships have been fostered very well with Planning Authorities across the UK over the last 2-3 years of BT Wind for Change projects (such as by securing community and environmental benefits through negotiated section 106 agreements). This could be undermined if the decision making process restricts Local Councils to a consultee and does not allow for it to be involved in meaningful discussions. It is not clear from the draft document if, or how, such community and environmental benefits would be negotiated in these circumstances.

9. Does the draft National Policy Statement for Renewable Energy Infrastructure (EN-3) appropriately cover the impacts of the specific types of new energy infrastructure covered in them, and potential options to mitigate those impacts:

BT welcomes the key issues that are likely to need specific consideration when assessing the environmental impacts of renewable technologies, e.g. radar, ecology.. However BT believes the policy is should be bolder. More weight should be given to the benefits and positive effects that can result from renewable energy development. These factors should be included in the EN-3 criteria.

10. Do you have any comments on any aspect of the draft National Policy Statement for Renewable Energy Infrastructure (EN-3) not covered by the previous questions:

The 50MW threshold is significant in relation to onshore wind projects proposed below 50MW. The NPS contents will be seen as a material consideration only when determining smaller onshore wind projects at local level, rather than the primary determinant.

The NPSs are unlikely to make much difference to renewable energy projects below 50MW. BT would like to see a faster and more streamlined process being applied to all planning applications, and would like the Government to consider how this could be achieved through the NPS.

28. Does this package of draft energy National Policy Statements provide a useful reference for those wishing to engage in the process for development consent for nationally significant energy infrastructure, particularly for applicants?

BT supports the package since it establishes a consistent and formal higher tier of policy across England and Wales. This is considered to improve efficiency and certainty for developers, landowners and the wider community.

February 2010