

***UK Renewable Energy Strategy Consultation***  
**A CPRE response to the consultation paper by the Department of Business, Enterprise and Regulatory reform**

September 2008

**Introduction and Summary**

1. The Campaign to Protect Rural England welcomes the opportunity to comment on the Government's consultation paper, *UK Renewable Energy Strategy* (RES). CPRE is the nation's single largest participant in the land use planning system, where we have a key role as a proponent of the wider public interest in protecting the beauty, diversity and tranquillity of the countryside. We have a long track record and extensive body of research in issues relating to planning for renewable energy, and we contributed to the Royal Commission on Environmental Pollution study on Environmental Planning which reported in 2002.

2. We support effective action to help stabilise climate change and mitigate its effects on our local, national and world ecosystems. Nationally and locally we have promoted a range of actions to address this challenge, with a focus on the need to develop more 'energy conscious' planning to help reduce demand for energy through urban renewal and building design. Our network of branches and district groups has extensive experience of, and interest in, energy issues. Our Norfolk branch, for example, runs an Annual Green Buildings Award designed to promote more energy efficient buildings in rural areas. CPRE is a member of the Sustainable Energy Partnership and the Micropower Council.

3. CPRE advocates low-carbon development patterns which will both reduce the impacts of development on the countryside and lower carbon emissions. We support the development of appropriately-scaled, renewable technologies, micro-generation and decentralised energy systems. We also support the 15% renewables target and are keen to explore how planning can be more responsive in the face of climate change.

4. In this response, we focus on the consultation paper's questions which directly impact upon the environment and the landscape of England. We raise particular concerns about the proposed changes to the planning system which are designed to speed the development of new energy production infrastructure which we believe will undermine some key principles of the planning system which has served the country well for decades.

**This response includes the following key recommendations:**

- There is scope for further significant increases in energy efficiency across the household, business and public sectors. We urge the Government to take more radical steps than it has to achieve significant improvements in energy efficiency. We also advocate a much stronger role for spatial planning in promoting low-carbon development.
- CPRE is concerned that the planning system is being identified primarily as an obstacle to the deployment of renewable energy. We are particularly concerned at the clear implication that planning policy should attach less importance to wider environmental policy considerations in dealing with wind energy development.
- We support the draft RES proposal for a single, rigorous strategic assessment of renewable energy capacity across all regions provided this assessment carefully considered all environmental costs, including the impact of new infrastructure on the landscape and wildlife. This would provide a unified approach to any subsequent regional target allocation process and provide an important, focused opportunity for engaging with all key stakeholders.

- CPRE strongly urges the Government to use the remaining stages of the Planning Bill and the development of the proposed Community Infrastructure Levy (CIL) to address concerns surrounding ‘goodwill payments’ increasingly offered by wind farm developers.
- The Government should allow microgeneration and community heating schemes to be included in the kinds of infrastructure that can benefit from CIL.
- CPRE welcomes the Government’s commitment to new measures supporting microgeneration. We suggest a strong focus on community-based schemes.
- It is notable that the transport chapter completely ignores demand management policies and alternatives to driving and the contribution buses, vans and lorries could make to reducing energy use. This serious omission needs to be addressed, including consideration of ‘behavioural’ solutions that have knock on benefits, such as increasing safety, health, tranquillity and reducing congestion.
- CPRE supports bioenergy developments provided they do not result in significant damage to the landscape, wildlife and soil and water resources, and where a positive contribution is made to rural economies and real savings in greenhouse gas emissions can be achieved. Bioenergy production, processing and transport have serious implications for rural land use, and need to be carefully considered through the planning process.

## **Chapter 2 - Saving Energy**

5. CPRE believes that there is scope for further significant increases in energy efficiency across the household, business and public sectors. A report by the Performance and Innovation Unit, advising Government for the 2003 Energy White Paper, estimated that the UK could reduce energy consumption by a third. We strongly welcome the consultation paper’s recognition that ‘saving energy...is cheaper than investing in new generation plant’ and that the EU Renewable Energy Target changes the context for energy policy and makes ‘more radical measures to reduce energy use more economically attractive than previously considered’ (chapter 2).

6. We look forward to the forthcoming consultation paper on energy efficiency measures in the autumn. There is a pressing need for the new strategy to deliver a step change in household energy efficiency, including through a supplier’s obligation, as well as effective measures in the business and public sectors. However, as outlined in our comments on transport issues below, we are concerned that Government is not addressing effectively transport access in relation to new development.

7. In response to question 3 of the consultation paper inviting proposals for further cost-effective savings, we would urge the Government to consider the Code for Sustainable Homes and to work through DCLG to provide a robust definition of Level 6 of the Code. We also call for provision of sufficient resources to local authorities to help them enforce the Building Regulations, which are currently commonly being flouted according to research by the Building Research Establishment.

8. In line with the Planning Policy Statement on Climate Change, CPRE advocates a much stronger role for spatial planning in promoting low-carbon development (please see supporting document: PPS Climate Change Response). We reiterate our proposal that the current requirement for regional strategies to contribute to the national renewable electricity target by 2010 should be replaced by a requirement to develop broader regional sustainable energy strategies based on regional energy consumption. This broader approach would take into account the energy implications of all development, including transport infrastructure. It should also encourage planning to reduce the need to travel. At a local level, it would require developing policies to minimise energy consumption through the size, pattern, density, layout,

siting, orientation and design of all new development.

### **Chapter 3 - Centralised Electricity**

#### ***Planning Issues***

9. The consultation paper identifies a number of constraints on the development of new renewable energy sources, notably on and offshore wind and bioenergy crops. These constraints fall broadly into three categories: planning constraints, supply chain and grid connection constraints, and limits to land area, in the context of bioenergy crops. We are deeply concerned that the Government appears to view the planning system primarily as an obstacle to the deployment of renewable energy. This overlooks the positive potential of planning in helping to meet energy objectives while taking account of wider environmental objectives.

10. CPRE is particularly concerned at the clear implication that less importance should be attached to wider environmental policy considerations in relation to wind energy development. For example, it is stated that considering new areas for protective designations could compromise the development of wind energy developments, particularly offshore (para. 3.5.10). This runs counter to the Government's acceptance of the desperate need for an effective planning regime to safeguard the marine environment.

11. While paragraph 3.7 in the draft RES acknowledges the importance of a robust planning system, we suggest that the paper as a whole does not go far enough in acknowledging that this system should be key to securing future energy supplies in a responsible, democratic and sustainable fashion.

12. Experience shows that weakening the planning system leads to delay, uncertainty and poor decisions. Taking away local planning authorities' ability to determine what happens in their area in an effort to speed up the process, leads to communities feeling disenfranchised. This can sometimes result in them taking action through legal or other avenues which can frustrate the delivery of necessary development at later stages.

The draft RES draws heavily on proposed changes to the planning system laid out in the Planning Bill and the Energy Bill. We recognise the value of some proposals in the Planning Bill, however, notably the principle of National Policy Statements and a single consent regime for major developments. We believe that some of the most significant of the proposed reforms, however, would critically undermine the effectiveness of the planning system if taken forward in their current form.

13. In particular, we do not believe that vesting decision-making powers for large energy (including renewables) projects in a new, unelected and essentially unaccountable Infrastructure Planning Commission, with unprecedented scope to restrict public involvement in planning inquiries, will deliver either public consensus or a faster planning process as the Government hopes. Existing procedures for granting consent for major energy projects have worked increasingly efficiently in recent years, as the Planning Inspectorate showed at a CBI Conference in November 2007. We urge the Government to consider these points as the Bill progresses through Parliament.

14. Another source of some concern for CPRE is that the consultation paper appears to encourage renewable energy developers to appeal against refusal of planning applications. This seems to be promoted in order to seek a decision from the Secretary of State, who it is suggested would be prepared to recover such appeals from Inspectors for his or her own determination. This adds to our concerns over the Government's apparent desire to

undermine established planning procedures.

15. We welcome the reference to landscape in the draft RES, although this is rather limited and needs to be expanded. In particular, we are encouraged by the statement that: ‘In increasing the use of renewable energy, we will also need to consider the potential environmental impacts such as those on biodiversity, landscapes, air quality, soils and land, as well as the marine environment. ... We need to ensure that the delivery of the UK Renewable Energy Strategy will be carried out in such a way that as to secure the climate change benefits of renewables alongside minimizing negative impacts on the natural environment’ (10.3.2).

16. Nevertheless,, the paragraphs on environmental legislation in Chapter 3 are of great concern to CPRE. We are especially worried by the statement that ‘an appropriate balance needs to be struck between the UK’s objectives for nature conservation and renewable energy’. In our view, this is inconsistent with the UK Sustainable Development Strategy and Planning Policy Statement 1, which makes it clear that sustainability requires objectives to be pursued in an integrated way. Trade-offs between conflicting objectives should be avoided by pursuing solutions and approaches that are compatible with safeguarding landscapes and habitats.

17. CPRE supports the draft RES proposal for a single, rigorous strategic assessment of renewable energy capacity across all regions (para. 3.3.19) provided this assessment effectively embraces all potential environmental costs. This would provide a unified approach to any subsequent regional target allocation process and provide a single basis for engaging with stakeholders. Due to the piecemeal, market-led approach to the development of renewable energy until now, there had been no coherent assessment of available energy resources with environmental constraints and costs to help inform a national debate. To that aim we have also sent in a consultation response to Natural England’s Draft Policy on Wind Energy (see attached).

18. The consultation paper’s suggestion of a new, more prescriptive delivery mechanism disaggregating regional targets to both sub-regions and local authority areas (para. 3.3.14) ‘renewables growth points’ would be unworkable without a national assessment of energy capacity. The suggested disaggregated model would potentially be of great concern to CPRE as it is likely to lead to conflict with policies for the protection of landscape quality. However, factoring environmental constraints and costs into the national renewable energy assessment, would help understand the implications of any possible future development and inform the debate about reaching higher targets than those put forward in the existing regional renewable energy strategies.

19. CPRE strongly welcomes the recognition in the consultation paper of the need to address the issue of renewable energy developers offering ‘goodwill payments’ to local communities affected by planning applications. The consultation paper suggests that there is a need to formalise provision of community benefits and hints that this might be achieved through the Community Infrastructure Levy provisions in the Planning Bill, to avoid relying on the solely on the largesse of developers.

20. CPRE opposes goodwill payments on principle as they are tantamount to bribery and undermine public faith in planning. To the best of our knowledge, goodwill payments are only currently an issue in planning in relation to wind energy development. Community benefits for most if not all other forms of new development are addressed through the Section 106 process. Despite initial problems with the use of Section 106, which CPRE highlighted to the Nolan Committee in the 1990s, this process is now generally seen as working in accordance with publicly agreed policy objectives as set out in the development plan. This approach allows full public involvement and ensuring, through the legal enforceability of the agreements, a reasonable share of development profits for public goods such as affordable

housing that also relate closely to the development in question.

21. Goodwill payments have serious disadvantages when compared to Section 106 agreements in all these respects. We understand that, in many cases, goodwill payments are offered to whoever it is in the 'local community' that a developer feels like consulting, rather than channelled through the established consultation processes of the planning system. Money from the payments is often used for purposes bearing no relationship to the development, such as senior citizen's lunches and youth clubs, however worthy these may be in themselves. To the best of CPRE's knowledge, many of the payments offered to date have no means of being legally enforced. The experience of Argyll & Bute and Highland Councils in Scotland since 2003 also suggests that local communities can legitimately expect a great deal more in terms of community benefits than the average £1500 per MW of electricity generated that is being offered by wind farm developers. Clear policies set by local planning authorities can play a crucial role in this.

22. The Government has stated that goodwill payments should be seen as entirely outside the planning system and that they should not in any way influence decisions on planning applications. Although CPRE agrees with this in principle, in practice the distinction is incredibly difficult, if not impossible, to maintain. One example from the large body of evidence provided by our local groups (which we are prepared to make available to CLG/BERR) suggests that the offering of goodwill payments to a parish council in one English county prevented it from being able to come to a view on a planning application.

23. CPRE strongly urges the Government to use the remaining stages of the Planning Bill and the development of the proposed Community Infrastructure Levy (CIL) to address fully the issue of goodwill payments. We are keen to work closely with the Government on this issue. It should be made clear that wind farm developments are liable for CIL and local planning authorities can negotiate more proportionate levels of community benefit through CIL charging schedules. The Government should also allow microgeneration and community heating schemes to be included in the types of infrastructure that can benefit from CI. They should also set clear policies strongly encouraging local planning authorities to hypothecate CIL revenues from wind farm development towards small-scale renewable energy schemes. Such a move would clearly link benefits to the development from which they are sought, a well-established principle of Section 106 agreements that the Government also intends to build into CIL. Alongside this, CPRE calls on the Government to outlaw the use of goodwill payments for all types of development.

#### ***Removing electricity network constraints***

24. The consultation paper suggests that there may be cost-effective options such as *offshore* transmission for further transfer of electricity from Scotland to England. This is a solution which CPRE can support. However, we continue to advocate strongly the undergrounding of transmission lines in areas of high landscape sensitivity as a means of reducing the damaging impact of new wind energy schemes. It is a serious concern, however, that the consultation paper almost completely ignores landscape considerations connected with electricity transmission, even when referring to the public inquiry for the Beaully-Denny proposed grid structure reinforcement in the Cairngorms National Park.

#### **Chapter 5 - Distributed Energy – Microgeneration**

25. CPRE welcomes the Government's commitment to new measures supporting microgeneration. On the basis of our experience on the Community Renewables Advisory Board, we would suggest a much stronger focus on community-based schemes. Local communities are often better placed to deal with the technical challenges of microgeneration technologies; in addition, these schemes involve a larger number of beneficiaries which helps

spread the relatively high costs associated with microgeneration, while spreading the learning. In addition, community-based schemes lend themselves to decentralised or locally distributed energy transmission.

26. The benefits of locally distributed electricity and heat in terms of avoided carbon dioxide emissions, energy losses and large transmission infrastructure are significant. We warmly welcome the Local Community Renewable Generation Initiative launched by BERR after the publication of the consultation paper. We suggest that some of the Community Infrastructure Levy revenue from wind turbine schemes, for example, could be directed towards investment in community local distributed energy schemes.

27. Local distributed energy should feature much more prominently in the final RES. Our view is that the Government should set statutory targets for community microgeneration and local distributed energy schemes. These targets should be backed by fiscal measures such as a Renewable heat Incentive or a household (feed-in) tariff, as recommended in *The growth potential of microgeneration in England, Wales and Scotland* by Element Energy (2008) commissioned by BERR.

28. In line with our support for microgeneration, CPRE would not oppose further amendments to permitted development rights for microgeneration which the consultation paper proposes provided that they do not result in significant damage to the character or residential or business neighbourhoods.

29. On the other hand, we consider the consultation paper's proposal that Local Development Orders (LDOs) be used for wind turbine repowering applications to be both undesirable and unworkable. This proposal would impose a significant consultation burden to the local planning authority since the LDO would still have to be fully considered through the same consultation procedures that are used in the development plan process. For these and other reasons, we believe that LDOs are unnecessary and impractical and should be abolished.

## **Chapter 6 – Transport**

30. The transport chapter of this consultation seems to be largely based on the findings of the *King Review of Low Carbon Cars*. This is problematic for a number of reasons. First, the *Review* only focussed on the technological: “decarbonisation” of “road traffic” presupposes continuing existing transport patterns and trends. It is notable that Table 2.1 of the consultation document showing existing policies to reduce energy completely ignores demand management policies and alternatives to driving.

31. Carbon emissions from motor vehicles can be reduced in three broad ways:

- through technological measures such as more efficient and different types of motive transport;
- through behavioural change such as using public transport or physically active modes such as walking and cycling to reduce motor traffic, and
- through changes in land use planning guidance, to further promote local shops and services, control car parking and promote public transport-oriented new developments.

32. Although the *King Review* notes that “the technology that cuts car emissions could also save drivers money” it fails to think through the consequences of what is known as the “rebound effect”. The money saved could mean more driving or alternatively spending on higher carbon activities such as flights, cancelling out the savings. This is a particular reason why demand management is far more important than technology improvements.

33. Analyses<sup>1</sup> show that reducing carbon dioxide from cars is generally less cost effective than from other sectors, particularly domestic homes and the energy sectors. However, these analyses have largely concentrated on technological solutions that tend to cost more than behavioural solutions. Many behavioural solutions have other benefits such as increasing safety, health, tranquillity and reducing congestion: it is important to consider these other environmental and social issues when deciding which policies are best.

34. A particular concern for CPRE is the prediction in the *Review* that motor transport on roads will double by 2050: given the congestion in urban areas and on trunk roads, rural roads would be likely to bear the brunt of such an increase. Congestion would become much worse, threatening not just economic growth but also mobility.

35. Decarbonising current, let alone predicted, levels of motor traffic would require significant amounts of land take, whether for biofuels or wind farms, if not dependence on renewable energy produced in other parts of the world. Once international shipping and aviation is included, the proposals to reach carbon reduction targets in transport by technological means alone look even less credible: electric and hydrogen powered transport has to obtain its energy from somewhere.

36. The *King Review* focused on cars and perhaps this is why the RES consultation ignores buses, vans (the fastest growing form of road transport) and lorries. Consumption would be less if greater use was made of Grid Connected Vehicles, whether electric trains, trams or trolleybuses which are far more efficient and could reduce motor traffic.

#### Biofuels

37. Biofuels for transport is widely disfavoured. The *King Review* recommended that the focus moves away from biofuels, while Defra and the Environment Agency have rightly placed them at the bottom of their biomass hierarchy. More recently the Renewable Fuels Agency has reported that 81% of biofuel is failing sustainability tests.

38. CPRE welcomed the recent draft legislative resolution of the European Parliament on the proposal for a Directive on the promotion of the use of energy from renewable sources. (COM(2008)0019 – C6-0046/2008 – 2008/0016(COD)). We acknowledge the work undertaken by the UK Government within Europe in pursuing sustainability objectives for biofuels. In particular, we were pleased that:

- the European Parliament believes there is overwhelming evidence to drop the mandatory 10% target for fuels from renewables and the focus on fuels from biomass should be a qualitative rather than purely quantitative;
- recognition was given to the need for protection of biodiversity and the cultural value of landscapes; and
- a set of sustainability criteria has to be enforced, including the introduction of a dynamic GHG threshold (requiring minimum overall GHG savings) and that indirect land use changes (LUC) also have to be part of the criteria methodology.

39. While the preamble to the draft EU directive on Renewable Energy Strategy suggests that “increased use of biofuels for transport is one of the most effective tools by which the Community can reduce its dependence on imported oil – where the security of supply problem is most acute...”, the RES consultation notes (6.2.27) that biofuels are likely to have negligible effect on security of supply, reducing demand by 6-7% at significant cost.

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<sup>1</sup> See Annex 7.c in the *Stern Review Report on the Economics of Climate Change* at: [http://www.hm-treasury.gov.uk/media/8/D/Transport\\_annex.pdf](http://www.hm-treasury.gov.uk/media/8/D/Transport_annex.pdf)

### Embodied energy and access to low carbon vehicles

40. More efficient vehicles, in particular Battery Electric Vehicles and Hybrids have a higher embodied energy content, which across the life cycle can account for as much as half the energy consumed. Energy needed for manufacture would therefore significantly reduce the impact of lower emissions in use, particularly at a time when per capita car ownership is continuing to increase although average annual mileage is static or even decreasing (DfT Transport Statistics for 2007).

41. The higher embodied energy together with the costs of new technology translates to higher prices: hybrids can cost £4,000 more and BEVs up to £6,500 more than conventional cars. This makes them less affordable for those on lower income, for whom the lower running costs would be particularly attractive. The cost is also less attractive to those who have lower annual mileage by increasing the payback time.

42. Car clubs could be a significant part of the solution, in particular making the most efficient cars affordable and accessible for lower income groups. Research has shown that a single car club car can take up to ten cars off the road and that members who previously owned a car reduce their mileage by up to 50%. Furthermore car clubs can offer a range of vehicle sizes, enabling users to downsize to the smallest appropriate vehicle for their particular trip.

43. Recommendation 28 of the *King Review* suggests local authorities “consider promoting car clubs”, however many already did this as part of the previous round of Local Transport Plans. Something far more ambitious is needed now such as grants or subsidies, integration with a national travel smartcard and a national network of car clubs. Private ownership of higher carbon vehicles could face further taxes: for example Ireland introduced a €2000 p.a. motor tax for cars over 225g/km in 2008.

44. The question ‘how can we best incentivise renewable and low-carbon transport in a sustainable and cost-effective way?’ (question number 24 in the consultation paper), being based on the narrow terms of the *King Review*, is rather loaded towards particular answers. It is better to think how the use of unsustainable modes of transport can be reduced and how their environmental effects of all modes, particularly less sustainable ones, can be minimised.

45. The question of the timescales over which electric vehicles could contribute and Government action to promote their introduction (question number 26) relates primarily to technical issues about electric vehicles, a matter which is not within the expertise of CPRE. It is important, however, that the Government recognises that it will need to consider how to incentivise less unsustainable forms of motor traffic without increasing driving or reducing alternatives.

46. There are many synergies between increasing car clubs, sustainable transport alternatives, lower speed limits, reducing the demand to travel etc. which when combined could reduce the energy and in particular carbon intensity of transport, while achieving other public policy goals.

### **Chapter 7 – Bioenergy**

47. CPRE supports bioenergy developments (both related infrastructure and planting of crops) where a positive contribution is made to rural economies, where real savings in greenhouse gas emissions can be achieved and providing its scale is such that there is no significant damage to our landscapes, wildlife, historic environment or soil and water resources. These conditions need to be met if biomass use is to be sustainable in any

meaningful sense (see question 27).

48. Bioenergy production, processing and transport will have serious effects on land use, and as a consequence, on biodiversity, landscapes, historic environment and our soil and water resources. The nature of the impacts will depend on a combination of factors including type of feedstock, crop management, previous land use, scale of development and spatial distribution. A greater focus on managing these changes in land use through the planning system is essential if the growth of bioenergy production and use in the UK is to take place in a way that maximises greenhouse gas savings, contributes to the achievement of other environmental goals, and minimises damaging impacts.

#### Bioenergy and the environment

49. CPRE's main concerns on the utilisation of both biomass and biofuel crops relate to the effects on the terrestrial environment as a result of changes in land use and any intensification of production required for bioenergy crop cultivation. Both forms of bioenergy crops (biofuels and biomass) could have effects on landscape character, biodiversity, historic environment and soil and water resources.

50. Impacts on landscape character should be properly assessed before major bioenergy developments are undertaken, or where Government funding is provided, to ensure that changes to the patterns of land use do not result in serious damage to landscape character or important habitats.

#### Biofuels

51. CPRE believes that farmers intending to provide a significant amount of material for biofuel processing plants should be required to prepare an Environmental Impact Assessment to ensure that the effects on landscape, water and traffic movements are properly assessed.

52. We welcome the warnings contained in the report of the Gallagher Review about the environmental sustainability of biofuels. In CPRE's view, the targets for the introduction of biofuels should be put on hold. Further research is needed into the environmental effects of biofuels. We need to assess how much of our farmland can be used for bioenergy crops and then plan how to grow and process these crops in ways that do not damage the character of our countryside. Our landscapes and wildlife sites should not be put at risk. The report states clearly that "*the balance of evidence shows a significant risk that current policies will lead to net greenhouse gas emissions and loss of biodiversity through habitat destruction.*" CPRE believes that we should not take unwarranted risks with the environment. The Government should avoid sacrificing the quality of our countryside and its wildlife just to meet targets to provide biofuel for cars

#### Biomass

53. CPRE believes biomass crops could offer a number of advantages over biofuel crops. For instance, biomass energy is likely to be more suited to localised production for localised energy supply because of the bulky nature of the crops. Additionally biomass could potentially provide other benefits for the countryside, such as by making a positive contribution to character and helping to diversify the economy of rural areas.

#### Bioenergy from forestry and woodlands

54. Stimulating the restoration and sensitive, appropriate management of existing woods and the creation of new woods, could help to sustain and improve woodland biodiversity and assist in the delivery of UK Biodiversity Action Plan (BAP) native woodland targets. There

may be opportunities for increasing habitat diversity through the introduction of new crops. For example, suitably located and managed margins of SRC willow crops can provide a good habitat for woodland edge species. The use of forest residues and existing low-grade timber to provide biomass could also provide opportunities for the enhancement of existing native woods and the restoration of planted ancient woodland sites (PAWS) and other semi-natural habitats, such as lowland heathland or blanket bog, through selective and ecologically appropriate removal of non-native conifers, although inevitably this will only provide a short term source of supply.

55. CPRE suggests a hierarchy of preference could be developed for sourcing biomass from woodlands. This would begin with fuel from native woodland restoration and forestry wastes, followed by plantations of native plant species, followed by non-native biomass plantations. Providing an outlet for woodland products from existing amenity woodland could help to support its maintenance.

56. CPRE welcomes the recent announcement by Defra that a three year research project will examine the feasibility of short rotation forestry, looking at both native species and non-native species, for example eucalyptus. We are pleased that the project will assess impacts on landscape character.

#### Bioenergy and land use

57. The multiple pressures on land in the UK - to provide food, other commodities, wildlife, recreation, beautiful landscapes and ecosystem services – present a policy challenge to manage both the size of the bioenergy market, and the wider environmental impacts of bioenergy developments. The Government needs to have a greater focus on managing the changes to land use if the growth of bioenergy production and use in the UK is to take place in a way that maximises achievement of environmental goals (other than reducing GHG emissions) and minimises damaging impacts. This should be done primarily through the planning system, including by the introduction of new planning controls over significant changes in land use.

58. In general, CPRE believes there should be more consistent, joined-up thinking between Government departments that are concerned with economic development, energy, transport, planning and countryside protection. Careful consideration needs to be given to the best way to utilise our limited land resource to maximise benefits in terms of reducing greenhouse gas emissions, including examining potential thresholds for biofuel and biomass supply.

59. To achieve this CPRE believes the planning system needs to be equipped with adequate policies and guidance which enable it to support local authority decisions that seek to control the pressures on changes to land use arising from the need to grow bioenergy crops close to processing and power generating infrastructure. CPRE believes that significant changes in the use of agricultural land should be brought under planning control in order that the public and local communities can have a say on proposals affecting their area. For example, changes to land use connected with the development of a biofuels processing plant.

60. CPRE recommends that Government targets for biofuels should not be imposed on regions without careful national strategic assessment of the effect of meeting these on the countryside. We recommend that to reduce traffic and greenhouse gas emissions, any national strategy for bioenergy should stipulate a maximum distance of 30 miles between the crop and any processing plant.

61. CPRE believes further research needs to be conducted into the potential for energy production from biogas and its implications for the rural environment, rural businesses and

rural communities. The use of manure slurries for biogas could potentially assist farmers in meeting a number of environmental requirements related to water quality.

### **Chapter 11 - Delivering the Target**

62. We would like to emphasise that while CPRE supports the 15% renewable energy target, we are concerned, that the proposals in this consultation will significantly erode the democratic accountability of the planning system. This is likely to result in disaffected local communities who resist rather than facilitate the implementation of measures designed to help meet the target.

63. CPRE also has grave concerns with the overwhelming economic focus of this consultation. While we are aware that this consultation is primarily looking at the economics of achieving a 15% increase in the use of renewables, we would urge the Government not to destroy the environment it is trying to save by rushing through measures that will ultimately be harmful to communities, wildlife and landscape.

CPRE  
September 2008