

**PSM18**

**South Gloucestershire  
Core Strategy  
Examination**

**Position Statement  
for Matter 18:  
Renewables (CS3 & CS4)**

**May 2012**

## Matter 18 – Renewables (CS3 & CS4)

### Q1 Is either policy inconsistent with the objectives in the [National] planning framework, excessively onerous or likely to place unreasonable requirements on development?

Council response – Policies CS3 & 4 are reasonable and consistent with national policy when tested against the provisions of the NPPF.

#### 1.1 Paragraph 97 of the NPPF states:

*‘To help increase the use and supply of renewable and low carbon energy, local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources. They should:*

- *have a positive strategy to promote energy from renewable and low carbon sources;*
- *design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts;*
- *consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources;*
- *support community-led initiatives for renewable and low carbon energy, including developments outside such areas being taken forward through neighbourhood planning; and*
- *identify opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.’*

#### Have a positive strategy to promote energy from renewable and low carbon sources

1.2 The promotion of energy from renewable and low carbon sources is embedded throughout the Core Strategy. Reducing and Adapting to climate change is established as key issue 1 (pg16). The rural areas are specifically recognised as having a *positive contribution* to play in the generation of renewable energy (see Vision pg 23) and promoting *...renewable and low carbon sources of energy* is a Core Strategy ‘objective’ (pg 5). Accordingly, SGC commissioned a study into the ‘Potential for Renewable and Low Carbon Energy in South Gloucestershire’, June 2010 (Examination Library – EB48). As South Gloucestershire is a geographically varied district it has a wide variety of potential energy sources, but in particular paragraph 7.3 states,

*‘the South Gloucestershire area presents some significant opportunities for developing low carbon district heating networks to serve both new and existing buildings and industrial heat users. These opportunities exist because of:*

- *The proximity of the dense urban areas of North Bristol and varied land-use mix*
- *The industrial area of Avonmouth, with its existing and proposed sources of power generation and associated waste heat,*
- *The potentially significant level of new development on strategic sites.’*

Policy CS3 is therefore designed to encourage all forms of renewable and low carbon energy generation, whilst policy CS4 responds to the opportunity presented by the particular characteristics of the principle urban areas in South Gloucestershire, by promoting district heat networks.

Design policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts

- 1.3 Policy CS3 is consistent with this objective in supporting proposals for renewable & low carbon energy generation whilst taking account of landscape and visual impacts (policy CS3 para 1 & 3).

Consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources;

- 1.4 The Council will consider identifying suitable locations through the proposed Policies, Sites and Places DPD (see para 5.41). Identification of locations is not a requirement of the NPPF.

Support community-led initiatives for renewable and low carbon energy, including developments outside such areas being taken forward through neighbourhood planning

- 1.5 Policy CS3(2) and para 5.37 supports community led approaches to the delivery of renewable and low carbon energy schemes.

Identify opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.

- 1.6 The 'Potential for Renewable and Low Carbon Energy in South Gloucestershire', June 2010 (Examination Library – EB48) study identifies a range of opportunities where there is potential to make use of decentralised systems and co-locating potential heat customers and suppliers. Given that there are no substantive existing heat networks in the principal urban areas, policy CS4 is generic in nature and seeks to encourage the establishment of such networks and provide a policy framework that will promote their expansion and viability. The West of England Low Carbon Initiative, Renewables & Low Carbon Energy, Final Report, pg 67-68 (Feb 2012) (Examination Library – RD32) also sets out the opportunities for district heating networks in the locality. The Council in partnership with the University of West England has consequently appointed Cofely District Energy Ltd to carry out a district heating feasibility study of the Bristol North Fringe and North Yate. A number of our development partners are known to be engaging in this study. This report is expected to be available in July 2012.

- 1.7 Policies CS3 & CS4 are clearly therefore consistent with the NPPF:

- Policy CS3 clearly places no onerous or excessive requirements on developments.
- Policy CS4 only requires that developments of over 100 dwellings and 50dph provide evidence that renewable and low carbon sources of heating or CHP have been fully explored and if unfeasible, provide evidence to that effect (criteria 3 & 8).

- Evidence from localities that have established district heat networks (such as Southampton) suggest that they expand relatively quickly once potential heat customers become aware of the commercial advantages of being connected. A planning policy framework that requires developers to at least investigate the potential for connection is a key part of ensuring schemes are promoted and the benefits of schemes spread more widely.
- Given that provision is set out in the NPPF for encouraging decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers it is clear that central government considers that heat networks will remain a key technology in delivering its CO2 reduction targets. Similarly, the Committee on Climate Change has recently (May 2012) released a report on 'How Local Authorities can reduce emissions and manage climate risk' (Examination Library – RD47). The report (see pages 42-43 in particular) promotes the role of LAs in using their planning function to require new developments to incorporate or connect to district heating networks amongst a number of other roles from identification of opportunities to direct investment in schemes.
- Policy CS4 is therefore neither onerous nor likely to place unreasonable requirements on development. The policy may alternatively benefit development in the medium long term by encouraging the establishment of CHP and district heat networks to which new development can connect, thereby providing an alternative option of enabling developments to meet their CO2 reduction / Zero carbon obligations.

1.8 For clarity a number of amendments are proposed to the policy and supporting text. These are set out (Matter 18 – Q1) in Appendix A.

**Q2 Is it sensible to provide for district heating networks in smaller schemes (less than 100dw or 10,000sqm) when further development may not be forthcoming or where new technology could make provision redundant?**

Council response Yes – it is sensible to promote the connection of smaller schemes to district heating networks.

2.1 Policy CS4 only requires connection where there is an existing heat network nearby that it is reasonably practical to connect to. Given that an existing scheme is nearby the cost or viability of connection is dependant purely upon the length of pipework necessary (and ground conditions) to make that connection, i.e. the 'smaller scheme' is not required to provide its own heat source. The viability of connection will thus be dependant upon the installation cost of this pipework when compared with other heating systems such as individual gas boilers. The extent of pipework will be dependent upon the density of the scheme, i.e. a block of flats will require less pipework than a low density housing estate. Consequently it may be wholly appropriate and commercially advantageous to connect a scheme of less than 100 dwellings or 10,000sqm.

2.2 Should heat networks become established (in the plan period) they are most likely to be established in existing high density urban areas that benefit from a mix of land uses. Such 'smaller schemes' are thus likely to be brownfield sites of a higher density. For clarity amendment (Matter 18 – Q2) is proposed to the policy in Appendix A.

## Appendix A

### Suggested Modifications for Matter 18

Policy / Para	Proposed Modification	Justification	Main (M) or Additional (A) Modification
CS4 (p50)	<p>Major development proposals (more than 100 dwellings <u>that are wholly or in part greater than 50dph</u>, or non-residential of more than 10,000sqm) must:</p> <p><b>4. <u>include renewable or low carbon heating or CHP generation and distribution infrastructure on-site and demonstrate how opportunities to accommodate an energy and or district heating solution have been maximised, taking into account density, mix of uses, layout and phasing; and either or</u></b></p> <p><b>5. <del>include renewable or low carbon heating or CHP generation and distribution infrastructure on-site; or</del></b></p> <p><b>6. <u>connect to an existing renewable or low carbon heat distribution network...</u></b></p>	To provide greater clarity.	A
CS4 (p50)	<p>Developments of less than 100 dwellings or 10,000sqm of non-residential floorspace must connect to any existing available district heat network(s) in the vicinity, where reasonably practical <u>and in accordance with the NPPF.</u></p>	To provide greater clarity.	A
Para 5.47 (p51)	<p>...or practical e.g. if there <del>are more energy efficient means of satisfying heat demands</del> <u>is an alternative source of heat that delivers required CO2 reduction targets.</u></p>	To provide greater clarity.	A