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Warwick District Council
Planning Policy Team
Riverside House
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Leamington Spa
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(by email only)

7 June 2022

Dear Sir/Madam,

Representations to Draft Net Zero Carbon Development Plan Document

Please take the following feedback into account when finalising the above DPD.

The general policy aspiration to tackle climate change and decarbonise the wider development and construction sector, including the District's declaration of a climate emergency, is supported.

In addition to energy demand reduction, on-site and near-site energy supply, there should also be an explicit recognition that stand alone renewable energy generation developments and energy storage developments will play an important role in supporting the transition to a decarbonised electricity sector.

A quicker roll out of standalone renewable energy generation projects, as supported by the Energy Security Strategy, will result in quicker carbon savings and 'green' the network in the district.

Essentially, the more renewable energy that is supplied into the local grid, the cleaner the power being used by local buildings in the first place, supporting future key developments in the district.

The recognition (in Section 7.4) that there are a range of constraints to deploying large-scale renewable energy developments including solar farms is supported.

The recognition in the document that the vast majority of the district's land is in the Green Belt is acknowledged.

The document should acknowledge that it will be necessary to release land from the Green Belt to power the equivalent of the district's dwellings alone (before commercial, industrial, civic etc users are taken into account) due to the lack of availability of land outside the Green Belt with nearby grid capacity (noting the following point that linked renewable energy generation schemes still need a viable grid connection to export power when supply/generation exceeds demand).

This combined with the technical factors noted above indicates 'very special circumstances' which support the development of standalone renewable energy generation scheme in the Green Belt.

This is especially important given the complexities of connecting, for example, a solar farm or wind farm (noting that the latter is unlikely to be developed in the district any time soon due to planning policy restrictions in the NPPF, wind speeds are generally low, but there is a good solar irradiation resource to take advantage of) to a residential development or multi user commercial development (multiple metering points, Ofgem regulations

relating to power generation and selling electricity (non-core business activity for house builders and commercial developers, with associated risk and complexity etc)).

Developments with such 'direct' links would also need a viable grid connection to export power in the event of supply exceeding demand, which brings on-site / near-site into the same situation as standalone developments in terms of the complexities and regulation of generating and selling electricity.

The opportunity for non-direct (i.e. not physically connected) power purchase agreements to be agreed between local generators i.e. a proposed solar farm, and an existing or proposed development, should be recognised and supported.

I trust the above will be taken into consideration.

Yours faithfully,


James Jamieson MRTPI
Planning and Development Manager