



RTPI

mediation of space · making of place

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24th April 2009

Douglas Cook
Department of Energy and Climate Change
Severn Tidal Power Team
1 Victoria Street
London SW1H 0ET
UK

Email response sent to: stp-consultation@berr.gsi.gov.uk

Dear Mr. Cook,

RESPONSE TO CONSULTATION PAPER: Consultation on the Severn Tidal Power Feasibility Study

The Royal Town Planning Institute is the leading professional body for spatial planners in the United Kingdom. It is a charity with the purpose to develop the art and science of town planning for the benefit of the public as a whole. It has over 22,000 members who serve in government, local government and as advisors in the private sector.

This document responds to the Department of Energy and Climate Change (DECC) consultation on the Severn Tidal Power Feasibility Study.

The response has been formed drawing on the expertise of members including RTPI Cymru and the Environmental Planning and Protection Network.

If you require any further assistance, please contact Rebecca Coates, Planning Policy Officer on 020 7929 9466 or email policy@rtpi.org.uk.

Yours sincerely,

Rynd Smith
Director Policy and Communications
Tel: 0207 929 9494

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Background

The RTPI recognises that urgent action is needed to tackle the threat of climate change. The Institute is currently engaging members on a review of its New Vision for Planning and the position that climate change must now be recognised as the fundamental driver behind sustainable development, and to ensure that, as a matter of priority, planning policies are made and decisions taken in the interests of mitigating and managing climate change processes and ensuring sustainable development. In carrying out this work with its members, the RTPI proposes that the initial focus of the response should be on how to facilitate the movement towards more sustainable energy generation and use, and on how to develop more sustainable forms of communities which are based on lower energy and de-carbonised systems of movement¹

As your consultation states, the Severn Estuary represents a significant source of renewable energy, which could make an important contribution to meeting the Government target of reducing greenhouse gas emissions by 80% by 2050. The RTPI supports the government target and recognises that its achievement will require the taking of difficult decisions which address the global imperative to mitigate climate change. The RTPI agrees that whether to go ahead with a Severn Power generation scheme needs to be considered in the context of the alternative means of meeting our energy and climate change goals.

At the same time, the RTPI recognises that the Severn Estuary is a very special place; it is a thriving European wildlife site used by over one hundred species of fish and its vast marshes and mudflats are used by 69,000 birds each winter; it also has cultural and recreational significance for the communities which border and use it.

The RTPI therefore supports the Government's exploration of how to harness the considerable tidal power resource of the Severn estuary in a sustainable way.

The Severn Tidal Power Feasibility Study should seek to identify a project which maximises the generation of renewable energy, while minimising damage to the Severn Estuary's internationally important wildlife, and natural and historic environment, at an affordable cost to tax-payers and consumers. It must do so in a way which properly engages stakeholders and local communities.

Planning principles

The RTPI is particularly concerned to see the following principles followed, both in the feasibility study and the ongoing planning process.

- The project must be selected on a firm base of rigorously tested evidence, following best practice in the use of tools such as Strategic Environmental Assessment (SEA), Environmental Impact Assessment (EIA) and appropriate assessment (AA) under the Habitats Regulations
- The planning process must consider a broad range of options and their implications in an iterative fashion
- Options, and the project selected, must be thoroughly tested through open and transparent public engagement and debate
- The relationship between the project and the national, regional and local statutory planning framework (both in

¹ See: <http://www.rtpi.org.uk/item/2293&ap=1>

England and Wales) must be clearly articulated

These principles, and their application to the feasibility study, are considered further below.

Evidence and options

The RTPI welcomes the use by DECC of SEA as an appropriate tool to consider the environmental implications of the proposals. Although social and economic impacts should also be carefully evaluated, the nature of the project and its impacts is such that the environmental issues are likely to be the most critical to its determination, and SEA should investigate these thoroughly.

The SEA Directive obliges the decision-maker to assess all 'reasonable alternatives' and good practice suggests that SEA should start at the earliest stage of plan preparation and continue alongside it, informing the planning process in an iterative manner. Whilst, the RTPI acknowledges that the SEA process needs to run according to a timetable and reach to a clear conclusive position with respect to the alternatives under evaluation, options which are rejected at an early stage may need to be reconsidered later if the environmental costs of preferred options are found to be too high. It is important that the options evaluation process does not result in the premature dismissal of options which, but for the consideration of readily available data or apparently viable technologies, could then be appraised with the prospect of delivering less environmentally harmful outcomes at equivalent energy benefit.

Some of our members have questioned whether the shortlisting assessment framework in the Interim Options Analysis Report achieves an appropriate balance in its evaluation of energy, cost and environmental impact criteria. The RTPI believes that, given the objectives of the feasibility study to produce a reasonable affordable and strategically significant supply of renewable energy, the initial shortlisting procedure should have involved the application of resources to bring forward the technologies which could potentially have a more minimal environmental impact, to enable them to form part of the SEA assessment process.

The consultation asks whether it is better to wait for new and perhaps less environmentally damaging technologies to be developed, or to move ahead quickly with available proposals. However, it does not provide details regarding the level of funding, resources, or timescales involved for these technologies to reach the stage of being 'sufficiently technologically developed' to be progressed as part of the study. Clearly these are factors which are critical for the formation of an informed response to this question. The RTPI welcomes the Government's commitment of £0.5 million under the Embryonic Technologies Scheme (ETS) to develop innovative tidal power technologies for harnessing the power of the Severn. The Government should work to deploy this funding quickly and efficiently within the timescales of the feasibility study, ensure that these technologies are adequately investigated, and that their evaluation is incorporated into the current project programme. However, we question whether the funding and time allocated to the ETS are sufficient to enable multiple proposals to be investigated and for these investigations to be adequate to inform the final decision of the feasibility study. We recommend that the Government levers more funds from its £50 million Marine Renewables deployment Fund. This should not delay the current evaluation work on the shortlisted options.

Stakeholder and public engagement

Effective stakeholder and public engagement is crucial to project selection, design and support by local communities. The RTPI welcomes the current consultation, but stresses the importance of engaging with local communities at an early stage in the process. Local authorities will have a particularly important role in making local people aware of the issues and how they can engage in the process. However, LPAs will require resources for this and for the requirement of

specialist knowledge that will need to be bought in, for which Government support may be required. Planning Aid can and should have a strong role in supporting communities' involvement. However, it must be noted that the project crosses the ambit of Planning Aid for England, managed by the RTPI and for which the RTPI can speak directly, and Planning Aid Wales which is an independent charity, in respect to which the RTPI cannot make committing statements about resources and capacity. However, the work of Planning Aid Wales would have to be carried out in partnership and would require equivalent funding to serve as an effective agent of public engagement. This is a matter for discussions between Planning Aid Wales and the Welsh Assembly Government, with which the RPTI would be happy to assist if required.

The proposed National Policy Statement on renewable energy will have an important bearing on the final determination of the project, although the RTPI understands that it is unlikely to be location-specific. It will also be prepared and published in advance of the conclusion of the Severn Tidal Power Feasibility Study. Nonetheless, it is important that local communities around the Severn Estuary are properly engaged in consultation on the draft NPS.

In later stages of the process, the major infrastructure pre-application and application procedures under the Planning Act 2008 will apply. The RTPI notes the recent publication by Communities and Local Government of draft regulations and guidance on these procedures, and will be commenting separately on these.

Many key stakeholders, such as local authorities and statutory agencies, are already involved in consultation on the study. The RTPI notes that the Marine and Coastal Access Bill currently before Parliament contains proposals for a Marine Management Organisation (MMO). Once established, the MMO should be given an important role in advising on the emerging proposals for the Severn Estuary.

Statutory planning framework

The project is emerging at a time of significant change in the planning systems, both in England and Wales, and terrestrial and marine. Any project to harness the tidal power of the Severn Estuary is likely to be a Nationally Significant Infrastructure Project under the terms of the Planning Act 2008, and will be determined in accordance with the relevant national policy statement.

At the same time, there are a number of other planning documents which are likely to be relevant to the emerging proposals: in Wales, Planning Policy Wales, the Wales Spatial Plan and local development plans; in England, the regional spatial strategy for the south-west and local development frameworks. In addition, the Marine and Coastal Access Bill proposes a new system of marine spatial planning.

It is important that, as the project proceeds, the relationship between the project and all such plans is clearly articulated. While 'lower tier' plans must take national policy into account, it is also important that national projects are aligned as closely as possible with local priorities as expressed in development plans. While local authorities will have the opportunity to comment at the application stage through a local impact report, it is also important that they are closely involved at the earlier stages of project development in order to inform the preparation of their own plans.

Issues for further investigation

The RTPI also recommends that an Independent advisory panel, taking account of both the English and Welsh systems, is established to oversee emerging proposals. It should include expertise on a broad range of issues, such as planning, ecology, engineering, architecture and landscape architecture.