



RTPI

mediation of space · making of place

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22nd June 2009

Rachel Sides
Department of Energy and Climate Change
1, Victoria Street
London
SW1H 0ET

Email response sent to: ccrguidance@decc.gsi.gov.uk

Dear Rachel Sides,

RESPONSE TO CONSULTATION ON GUIDANCE ON CARBON CAPTURE READINESS AND APPLICATIONS UNDER SECTION 36 OF THE ELECTRICITY ACT 1989

Thank you for the opportunity to respond to the above consultation. The RTPI is a membership organisation representing over 22,000 spatial planners. It exists to advance the science and art of town planning for the benefit of the public.

The RTPI launched its Seven Commitments for “planning to live with climate change” at its convention last week, demonstrating the profession’s dedication to addressing the issue and the need to ensure that climate change is recognised as the fundamental driver behind sustainable development.

The RTPI believes that the initial focus of the response to climate change should be on how to reduce the demand for energy, and then facilitate the movement towards more renewable energy generation. In such a context, carbon capture in combustion plants is seen as a short-term interim measure borne out of necessity. Nonetheless, the RTPI supports the need to ensure new combustion plants are carbon capture ready and for existing plants to be retrofitted for Carbon and Capture Storage (CCS).

Please find below the RTPI response to the specific questions set out in the consultation document.

- 1. Taking into account the current state of the development of CCS technologies, and of related regulation, does the draft guidance document (Annex 1) for applicants for section 36 Electricity Act 1989 consent provide sufficient clarity on the level of detail required in the assessments necessary to demonstrate carbon capture readiness.**

In the current evolving circumstances it is important to provide some guidance, rather than waiting upon further technological advances. The challenge for the Guidance must therefore be to effectively balance the need to be flexible and take account of the evolution of the technology with the need to ensure that there is no opportunity to evade CCS.

The RTPI believes that the Guidance would benefit from illustrative examples which indicate the nature and extent of the information required. This would be helpful in conjunction with the ‘Key Information’ criteria. It would provide necessary clarity for applicants as to the nature of the material required and ensure that a sufficient level of detail is provided to

demonstrate that the development is carbon capture ready.

The RTPI recommend that clear guidelines should be given, in addition to that provided in paragraphs 77-82, as to the content and format of subsequent monitoring reports to ensure a consistent level of thoroughness for these reports. The RTPI also feels that there is a need to establish a method of sanction to ensure that the reports contain the appropriate level of detail and research, and take account of all the relevant factors. The guidance needs to set out the consequences for the failure to take account of new and emerging innovations within this field in the report.

Please note that in paragraph 13 of the guidance, we believe that the word “footfall” should be replaced with “footprint”, referring to the shape and orientation of the ground floor of the combustion plant structure.

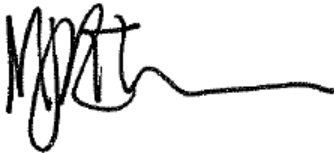
2. Taking into account the Government’s policy on CCR, does the draft guidance document (Annex 1) for applicants for section 36 Electricity Act 1989 consents cover all the issues that applicants might usefully seek to address to demonstrate they are carbon capture ready? If not, what might these be?

The RTPI believes that paragraph 27, which states that ‘If the economic assessment were to conclude that retrofitting will not be economically feasible, it is anticipated that a s.36 EA consent would not be granted,’ should be strengthened to be explicit that consent will not be granted unless it can be demonstrated that the proposal is carbon capture ready.

The Institute considers that the relationship between this consent regime and the need for Environmental Impact Assessment (either at this stage or with regard to later related stages) needs to be explored further. The current guidance implies that consideration of the impacts of transportation corridors and off-site processing can be left for later determination. However, if applicants are encouraged to undertake at least a limited EIA of such aspects of their proposals early on in the process, it could prevent unnecessary delays, or even the abandonment of the project, later on.

If you require any further assistance, please contact Rebecca Coates, Planning Policy Officer on 0207 929 9466 or email england.policy@rtpi.org.uk.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Matt Thomson', with a long horizontal flourish extending to the right.

Matt Thomson
Head of Policy & Practice