

Central Lincolnshire Local Plan Examination

Hearing Day 4: Matter 5 – Energy, Climate Change and Flooding

Hearing Statement prepared by Pegasus Group on behalf of Ecotricity

Issue 3 – Renewable Energy, Protecting Energy Infrastructure and Wider Energy Infrastructure – Policies S14, S15 and S16

Q1. The supporting text at paragraph 3.3.4 of the Plan refers to 150MW of capacity from wind turbines and 230MW of capacity from solar PV. What is the justification for the inclusion of these targets in the supporting text if they are not “...set as either a cap or a ceiling”?

Introduction

We welcome that Policy S14: Renewable Energy states that the Central Lincolnshire Joint Strategic Planning Committee is committed to supporting the transition to a net zero carbon future and will seek to maximise appropriately located renewable energy generated in Central Lincolnshire, and that proposals for renewable energy schemes, including ancillary development, will be supported.

The intention set out in paragraph 3.3.1 is also welcomed; the role of the Local Plan in facilitating ‘an increase in renewable energy generated in Central Lincolnshire, as part of a transition towards a net-zero carbon future...by proactively encouraging investment in renewable energy infrastructure, encouraging and supporting the delivery of wider transformation infrastructure (such as energy storage).’

We accept that this approach and Policy S14 itself is in accordance with the NPPF’s statement that in order to increase the use and supply of renewable energy, plans should ‘provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts.’ (Paragraph 155).

Paragraph 3.3.4 and Capacity Targets

However, we are concerned that paragraph 3.3.4’s reference to an aim of the Joint Committee to ‘facilitate the delivery of approximately 230MW’ of solar energy (presumably within the plan period) runs the risk of being unsound. It is understood that this figure is not set as ‘either a cap or ceiling’ (although the sentence syntax could be improved), and indeed the figure does not appear within the text of Policy S14: Renewable Energy.

We note from the evidence base (Central Lincs Policy S14: Renewable Energy Evidence Report – March 2022) that this figure of 230 MW is at the lower end of that recommended in early 2021 by

Pegasus House, Querns Business Centre, Whitworth Road, Cirencester, GL7 1RT
T 01285 641717 E Cirencester@pegasusgroup.co.uk
Offices throughout the UK and Ireland.

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales
Registered Office: Pegasus House, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire GL7 1RT

Expertly Done.

DESIGN | ECONOMICS | ENVIRONMENT | HERITAGE | LAND & PROPERTY | PLANNING | TRANSPORT & INFRASTRUCTURE

consultants as the most appropriate target for Central Lincolnshire to ‘help the UK meet its targets’ and to achieve a carbon neutral Central Lincolnshire by 2050 to accord with the Paris Agreement.

Our concern is that the stated figure is very low in comparison with the solar energy capacity and requirements of Central Lincolnshire as identified by the renewable energy sector, as evidenced by the number of detailed proposals currently under consideration or due to come forward in the next 12-24 months within both North Kesteven and West Lindsey. Indeed, taken together, the larger solar projects that are actively being progressed within and close to the Plan area total almost 5GW (Substations at West Burton 1200MW; Staythorpe 1200MW; Bicker Fen 1100MW; Cottam 1000MW; High Marnham 300MW; and Walpole 170MW) according to the National Grid Capacity Register.

Moreover, the reference to the lowest and least ambitious figure from the evidence base does not accord with the clear direction of Government policy from the Energy White Paper (2020), through the Carbon Budget Order (2021), Net Zero Strategy: Build Back Greener (2021), and Draft Revised National Policy Statements in Energy and Renewable Energy Infrastructure (2021), to the recent policy paper on British Energy Security Strategy (April 2022).

This latest Strategy document and demonstration of Government intent does not set a firm target for solar power but sets out an expectation for it to increase five-fold from today to a 70GW capacity by 2035. Recent ministerial statements have underlined the Government’s ambition to secure this increase, not least within the context of the challenges arising from the situation in Ukraine, as set out by Graham Stuart, the then Minister for Climate to the Parliamentary Environmental Audit Committee on 12 October 2022. It should go without saying that the energy position within the UK in 2022 has changed profoundly and irreversibly – due to global market forces and the politics of climate change - since the Joint Committee’s evidence base was compiled in early 2021.

This significant level of growth is reflected in the current level of activity within the sector. Recent figures (early 2022) from industry sources suggest that the current ‘pipeline’ of projects within the planning system (submitted, approved or under-construction) have a capacity of approximately 10GW across 435 sites. (*Solar Power Portal*, January 2022). (It is also worth noting that the same survey concluded that the potential pipeline for the sector during 2022 alone could be estimated at around 37GW, based on known interest at 910 sites of over 250kW capacity, albeit with a recognition that many of these projects may not reach the formal planning stage).

It is within this highly dynamic and persuasive context that whilst the figure of 230 MW is therefore of concern as being neither justified, realistic or effective, the reference within paragraph 3.3.4 to neither a cap nor a ceiling, also renders this element of the Plan as potentially unsound.

Conclusion

To avoid ambiguity at paragraph 3.3.4, a revised wording would provide a clear summary of how the evidence base (the consultants’ report of 2021) set out a methodology and findings to inform the emerging Local Plan. The range of figures for required solar and wind (along with any relevant comparators such as acres, football pitches, percentage of Plan) could be included as background



context for Policy S14. For this part of the Plan to be both effective and justified, the revised paragraph should at the very least clearly report the higher MW figures from the evidence base that the consultants concluded would be required to help the UK meet its targets and to achieve a carbon neutral Central Lincolnshire by 2050 to accord with the Paris Agreement.

Alternatively, in the interest of clarity and to avoid any ambiguity, paragraph 3.3.4 (and the related 3.3.5) could be removed in its entirety.