



RTPI

Royal Town Planning Institute

RTPI response to BEIS proposals on Energy Storage

December 2019

This is the RTPI's response to the December 2019 consultation from BEIS on energy storage in England and Wales.

About the RTPI

The RTPI champions the power of planning in creating prosperous places and vibrant communities. As learned society, we use our expertise and research to bring evidence and thought leadership to shape planning policies and thinking. As a professional body, we have over 25,000 members across all sectors, and are responsible for setting formal standards for planning practice and education. This consultation involves input from RTPI Cymru.

RTPI Response

1. Do you agree that it is appropriate to carve out electricity storage, except pumped hydro, from the NSIP regime in England and Wales?

The Principle of the Carve-Out

Subject to one concern about permitted development rights (see below) the RTPI is supportive of moving most storage to the TCPA regime. The proposals being brought forward are broadly in line with what the industry suggested in the previous consultation and is therefore supported (i.e. 50MW NSIP threshold for storage is too low and the NSIP process is too onerous, time-consuming and costly for this type of development).

Further guidance is also required as the carve out is quite complex. For example, in the absence of specific guidance, adding a battery storage to an existing generating site could be dealt with inconsistently across England and Wales. Under the current proposals, local planning authorities would be able to take their own views on whether permitted development, planning permission or a DCO/Section 36C variation should apply, creating significant uncertainty for developers. Guidance should make the practical application of this legislation much clearer to developers and planning authorities, and should also clarify the need for this type of technology as part of the energy mix.

We return to the issue of local capacity in greater detail below.

Permitted Development

We are concerned that transferring electricity storage to the TCPA system could open up the possibility of buildings in inappropriate locations because of the PDR rights given to electricity undertakers: see page 17/18 of the consultation.

There is a need to consider the permitted development implications to avoid storage developments in inappropriate locations but we think this can be achieved via carefully considering the approach to B.1 ‘Development not permitted’ and B.2 ‘Conditions’

Capacity and Skills

We have very recently researched the planning sector’s capacity for dealing with smart energy proposals and we are rather surprised to read this statement in the consultation document :

“.....With respect to the types of electricity storage that are currently deploying in GB (e.g. batteries), we are not aware of evidence to suggest that LPAs are not able to appropriately assess and determine applications through the TCPA regime now and in the future.” (Page 11)

In principle, the comment is correct but there have to be caveats around the average planner’s understanding (something a couple of respondents commented on) and there’s a need for guidance as evidenced by [research the RTPI published this year](#) on smart energy including storage issues. A critical part of this research looked at capacity on the ground and also support from central government:

“The chronic under resourcing of planning services, in terms of both numbers of officers and training, is evidenced by responses to the survey undertaken by this research and the 2019 RTPI report, Working in the Public Interest. Given the pressing need for upskilling of planners to address the clean energy revolution, urgent consideration is needed by MHCLG on how best to fund the necessary resources in LPAs, and/or external resources to support LPAs to deliver proactive planning policies on smart energy. There is a clear case that this investment is needed to unlock the economic and environmental benefits of smart energy in line with national energy policy and the Industrial Strategy. Smart energy has not been part of the planning profession’s traditional skillset. Lack of knowledge hinders the ability of LPAs to seize opportunities offered by new and emerging technologies, whether in framing the planning policy and practice that embeds clean energy in placemaking, or in responding proactively to development proposals. The lack of capacity for planners to maintain up to date knowledge and experience is also exacerbated by the continuing rapid development of technologies and markets. Even when higher standards for new developments are required by policy, development managers can lack the knowledge or access to expertise to judge whether a proposed energy strategy meets the standards set in policy, or indeed to insist on delivery when faced with viability arguments.

“There is a clear need for LPA officers, councillors and the public to better understand the role of smart energy technology as part of the future clean energy system. Access, for example, to training and information about energy storage is currently lacking, both at a professional level and in a form suited to members of the general public. There is a need for resources to be made available and tailored to stakeholders, such as online videos or animations, virtual reality walk-throughs, photo case studies and, where appropriate, site visits to operational sites that allow visitors to experience the genuine impacts of smart energy development. As an example of readily accessible information, Regen’s animation series for WesternPower Distribution (WPD) includes illustrated smart energy topics, such as a video showing the benefits for storage in the electricity system. The emerging smart energy industry is keen to engage with LPAs to explain the current and emerging technologies and, subject to ensured impartiality of such resources, the sector could offer a technically advanced and cost-effective route to training planners. Guidance is also being developed by other stakeholders, for example

the Energy Institute guidance on storage, which, as appropriate and where impartiality has been assured, could be endorsed by government and / or the RTPI to give planners confidence in the resource.” (pp 69-70)

Further issues and recommendations in the report include:

- A coordinated approach to support involving both BEIS and MHCLG
- Greater collaboration needed between LEPs and LPAs on planning for energy

The RTPI President has issued this year a [strong call for increased resources for local planning authorities](#) to handle the climate crisis, given the key role that planning plays. It is not clear from the consultation document whether the fees from more TCPA applications would necessarily plug this gap.

2. Do you agree that we should carve out electricity storage, except pumped hydro, from the offshore planning regime (NSIP and s.36 consent)?

Yes

3. Do you have any comments on the draft legislation or transitional arrangements?

No comment