

SCI03

THE BRITISH
WIND ENERGY

ASSOCIATION

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For the attention of the Local Plans Team

Re: Preparation of Bromsgrove District LDF – SCI Consultation

The British Wind Energy Association (BWEA) welcomes the opportunity to provide comments on Bromsgrove District Council's Statement of Community Involvement, and provides this submission on behalf of the UK wind energy industry.

BWEA was established in 1978 and is the representative body for companies active in the UK wind energy market. Its membership has grown rapidly over recent years and now stands at over 325 companies, representing 98.8% of all grid-connected wind energy now installed.

In representing the wind industry, BWEA is in a unique position to comment on the circumstances which will affect the future growth and development of the sector. BWEA would be pleased to clarify any issues raised and offer any further information which may be required.

A key principle underpinning the new planning system is the need for it to be transparent, accessible, and accountable, and to actively promote and strengthen public participation and stakeholder involvement.

Under the Planning & Compulsory Purchase Bill, local planning authorities are required to prepare a Statement of Community Involvement (SCI), in which to identify their approach to community involvement i.e.

- Who will be involved and how those involved are representative of the wider community and stakeholders; and
- How the approaches to consultation may vary in relation to different topics, different types of local development documents (core strategy, area action plans, and supplementary planning guidance), or at different stages in the document preparation process.

BWEA emphasises that the SCI should follow the guidance of Planning Policy Statement 12: Local Development Frameworks, and the recommendations contained in Planning Policy Statement 22: Renewable Energy.

In particular, PPS12 states that the SCI should be a clear public statement enabling the community to know how and when they will be involved in the preparation of local development documents and how they will be consulted on planning applications.

It is hugely important for all local planning authorities to adopt an inclusive approach to community involvement, to ensure that different groups have the opportunity to participate and are not disadvantaged in the process. Identifying and understanding the needs of groups who find it difficult to engage with bureaucratic processes such as the planning system is essential.

As highlighted in draft Planning Policy Statement 1: Creating Sustainable Communities, effective community involvement requires processes for:

- Notifying and informing communities about policies and proposals in good time.
- Enabling communities to put forward their own ideas and participate in developing proposals and options, rather than simply comment once these are fixed.
- Consultation on formal proposals.
- Feedback.

Community Involvement and Wind Energy Development

PPS12 suggests that it may be appropriate to explain how community involvement will be undertaken for different subjects or issues. In the case of wind energy development, appropriate community involvement at different stages in the planning process can have considerable benefits for all parties involved. It can help to improve understanding of the issues facing developers, local communities, and stakeholders, and therefore help to reduce conflict; it can help provide an opportunity to engage local people actively in the development of schemes; it can help to address concerns about the impacts of potential schemes; and to explain the wider benefits of renewable energy (A Companion Guide to PPS22, 2004).

There are many methods of community involvement that may be appropriate at different levels and stages of the planning process i.e. regional, local level. This is discussed in detail in 'A Companion Guide to PPS22', and should be considered by all local planning authorities in preparation for their SCI.

Local planning authorities may wish to consider informing local communities about renewable energy, its potential benefits and any potential effects of development, before any schemes are submitted for planning permission in their area. It is important to offer a balanced view to the public, before any specific schemes are discussed, as a better-informed public is more likely to look at a proposal objectively and realistically.

As identified in paragraph 4.26 of 'A Companion Guide to PPS22', appropriate methods of community involvement will vary depending on the stage in the planning process, but may include:

- Public exhibitions, displays, roadshows;
- Presentations at public meetings;
- Dissemination of information via the internet, local press, or leaflet drops;
- Consultation with focus groups; consultation with parish and town councils.

The issues that may need to be addressed could include:

- A lack of awareness about the technology and concerns about noise, visual effects, odour and other perceived hazards;
- Juxtaposition between the importance of addressing a long term global impact threat such as climate change, and the specific, immediate local impacts arising from a particular project; and,
- Difficulties in making the link between regional policy and local delivery.

For further guidance on community involvement and wind energy development, BWEA recommends local planning authorities refer to the 'South West Public Engagement Protocol for Wind Energy' (available at www.regensw.co.uk/cotent-download/Report-SWPEPWE-ProtocolandGuidance.pdf). The document discusses the various options for community involvement at each stage of the planning process, and offers valuable guidance in terms of how to deliver these options effectively and appropriately. Endorsed by the South West branch of the Local Government Association, the South West branch of the Royal Town Planning Institute, and BWEA; the Protocol could be used by local planning authorities as a basis upon which to develop their own approach to community involvement for wind energy development.

Community Involvement in Significant Planning Applications

Local planning authorities will have the power to identify the level of community involvement they consider appropriate for different types of 'significant' planning application, including renewable energy generating schemes. BWEA emphasises the importance of local planning authorities highlighting in their SCI what level of community involvement they consider appropriate.

I confirm that BWEA want to be notified of the further stages in the preparation of this document, including submission to the Secretary of State, examination and eventual adoption.

Thank you for the opportunity to submit comments to the discussion group, BWEA looks forward to future opportunities to participate in Local Development Framework consultations. If you have any queries please do not hesitate to contact BWEA.

Yours sincerely,

Katie Adderley
Planning Advisor, BWEA



Stakeholders for Consultation (statutory stakeholders are shown in red)

District Council
County Council
Councillors
Parish Council
MP
Environment Agency
Countryside Agency
English Nature
English Heritage
The Royal Society for the Protection of Birds (RSPB)
Local Wildlife Trust
Area Rights of Way Officer
ITC (Independent Television Commission)
OFCOM (now includes ITC and RCA)
British Broadcasting Corporation (BBC)
Crown Castle UK Ltd
British Telecommunications (BT)
T-Mobile UK
Vodafone
Orange
O2 (formerly BTCellnet)
National Transcommunications Ltd (NTL)
Cable and Wireless
Electricity company
TRANSCO
Civil Aviation Authority (CAA)
Ministry of Defence (MOD)
National Air Traffic Services (NATS)
Health & Safety Executive
DTI
The Highways Agency (HA)

Please note: this list is not exhaustive – to be used as guidance only.