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Dear Sirs,

**A SMART, FLEXIBLE, ENERGY SYSTEM - A CALL FOR EVIDENCE**

Thank you for the opportunity to contribute towards the development of government policy on facilitating a smarter, more flexible energy system

Low Carbon Alliance is an independent Chartered Surveying business developing small scale energy generation and energy storage projects. We have an active programme and fund which owns land which has been permitted for energy generation plants and which are now either generating or soon to be commissioned.

Specifically, in answer to section 21.4 of the call for evidence and question 5 in the catalogue of questions, reference planning I make the following comments, observations and recommendations.

The Planning regulatory framework is badly in need of being updated to cater for energy generation and energy projects.

It is very clear that use of brownfield industrial land is most appropriate for the siting of such projects for 2 reasons: -

- 1) Transmission losses – Plants connected to the Distribution Network located adjacent or in close proximity to where the electricity is being consumed will result in a more efficient system as there will be less electricity lost in transmission. Storage plants located on greenfield sites which in the majority will be located away from electricity consumers will incur transmission losses when charging up and additional losses when feeding the power back into the network to be consumed.
- 2) Availability of land – there is still significant amount of brownfield land available across England and Wales that could be used for power storage and generation. There are few justifiable reasons why storage should be located on greenfield sites. The minimal environmental, traffic or other impacts of battery storage and energy generation make such locations entirely suitable. There are of course exceptions. On occasion the only available financially viable Point of Connection where there is available capacity for a storage or generation is in a greenfield location.



## **Our Experiences**

In England energy generation uses are treated as sui-generis. So, to progress sites on brownfield or indeed greenfield land a change of use is required. As sui generis there is no explicit policy framework provided in the National Planning Policy Framework or guidance in the Planning Practice Guidance.

As there is no explicit guidance on how such applications are to be treated or how Local Plan policies are to be framed we do encounter a mixed response from planning authorities when they are approached for pre-application meetings and faced with applications.

Whilst our experience is that local planning authorities are generally supportive, the need for planning approval to a change of use does introduce delays and uncertainty on a new build sites. In industrial or employment areas, our experience of small scale energy generation projects suggests that, because the use sits outside of the B use classes, loss of employment land issues are often be raised.

## **Recommendations**

In maintaining and developing the supportive planning context for battery storage schemes and small scale (sub 50MWp) consideration should be given to:

- The scope for permitted change of use from industrial uses to battery storage
- Guidance in Planning Practice Guidance on the locational requirements where brownfield land is not available for cost effective and efficient battery storage – not least proximity to the grid and distribution network and to areas of demand. This should also refer to the contribution that such proposals make to promoting sustainable economic growth. This can then be reflected in Local Plan policies.

Should you require any further assistance going forward then do get in touch.

Yours faithfully

A handwritten signature in blue ink that reads "Simon Crowe".

**Simon Crowe MRICS**  
**Managing Director**