



CIWEM

The Chartered Institution of Water
and Environmental Management

23rd November 2004

Lawrence Cadman
Hd/Onshore Electricity Consents Team
Bay 2123
Department of Trade and Industry
1 Victoria Street
London
SW1H 0ET

Dear Mr Cadman,

Consultation on Guidance to Power Station Developers

The Chartered Institution of Water and Environmental Management (CIWEM) is the leading professional and qualifying body for those who are responsible for the stewardship of environmental assets. The Institution provides independent comment, within a multi-disciplinary framework, on the wide range of issues related to water and environmental management and sustainable development.

CIWEM welcomes the opportunity to comment on this guidance. Our primary concern with this guidance is that in its current form it does not directly address how the location of a power station can affect the opportunities for combined heat and power (CHP). CIWEM considers that there are currently a number of barriers to widespread use of CHP, and that guidance should seek to ensure that developers are equipped to overcome these obstacles, in order that CHP play its part in the development of a sustainable energy future in this country.

Key issues include:-

Transmission distance to heat users is key to the viability of CHP.

The final location of a power station is determined by many factors, not least the need to avoid excessively close proximity to environmentally sensitive receptors, identified through EIA within the overall planning and consenting process.

Some of these sensitive receptors may well be the main potential customers for the heat (e.g. residential and commercial areas).

Some of the sensitivities may be more perceptual than technical, as modern power station designs have minimal environmental impacts. However, all concerns are valid - it is for communities to make the decision that the appropriate balance is to have more local energy sources for local demands and to be satisfied that this does not present unacceptable adverse impacts.

Local concerns are a significant obstacle to greater take-up of CHP in the UK. There is a need for a greater public acceptance of local siting of power and heat sources - and that requires public confidence. Interestingly, this does not appear to be a significant problem in much of mainland Europe, where CHP is the norm for power stations.

This is a complex issue and not amenable to simple guidance. On the other hand, it is fundamental. The key point is that local stakeholders need to be fully informed of all relevant factors in their decision making - and consideration of stakeholders/customers is key to identifying the overall viability of any CHP option for a power station.

The guidance could be usefully expanded to at least mention the tension between local siting of heat and power sources and potential local concerns. It could address how developers might best engage the potential heat customers from the start in identifying options for CHP, given that the developer is otherwise quite likely to be siting the power station away from such customers.

In addition, the guidance could usefully include reference to possible assistance from the local planning policies and planning process in identifying heat markets and appropriate locations. Again, the overall planning framework is not directly addressed in the guidance but most local authorities have commitments to support CHP. Regional Development Agencies (RDAs) seem to be almost an afterthought. CIWEM considers that RDAs should be at the head of the list in pointing developers to perceived opportunity.

We would suggest that paragraph 12 of the guidance should be reworded. Currently this infers that a developer chooses a plot of land and then has to consider if CHP is viable, whereas seeking customers first (from throughout the UK) and then finding an adjacent site would be more appropriate, since the fuel is piped in.

A final comment is that we would hope that examples from other parts of Europe will be provided in the final document, in order to demonstrate what has been achieved elsewhere.

We hope that our comments are of use to you. Should you wish us to expand upon or clarify any points we have raised, please do not hesitate to contact us.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Nick Reeves', with a stylized flourish extending to the right.

Nick Reeves
Executive Director