



committee@greenparty.im

Planning and Building Control Directorate

Department of Environment Food and Agriculture
Murray House
Mount Havelock
Douglas
Isle of Man
IM1 2SF

14 August 2022

By Email

Dear Planning and Building Control Directorate

Planning Application 23/00055/B applying for permission (inter alia) to install a 27MW solar array and a 24MW battery dated 28 February 2023 (“the Application”)

1. We write to express our support for the Application and to indicate material factors that we believe would support the granting of the permission sought.
2. We consider that the Application will materially contribute to the decarbonisation of the electricity consumed in the Isle of Man. As of 2019, the gas fired power station located at Pulrose, Douglas produces c.94% of the electricity generated in the Isle of Man (see page 67 of ‘*Isle of Man - Future Energy Scenarios*’, Ove Arup & Partners Limited, July 2021¹).
3. Solar power generated electricity is significantly lower in the release of greenhouse gases per unit of electricity generated compared to a gas fired power station. See for example the following extracts from page 7 of ‘*Carbon Neutrality in the UNECE Region: Integrated Life-cycle Assessment of Electricity Sources*’, United Nations Economic Commission for Europe (March 2022)²: -
 - 3.1. “A natural gas combined cycle plant can emit 403–513 g CO₂ eq./kWh from a life cycle perspective”; and,
 - 3.2. “Solar technologies generate GHG emissions ranging from ... , and 8.0–83 g CO₂ eq./kWh for photovoltaics...”.
4. In the Isle of Man’s Town and Country Planning Act 1999, section 10(4) sets out that in considering a planning application, the Department (ie. the Planning Committee) shall have regard to the provisions of the development plan. The overarching development plan for the Isle of Man is the Isle of Man Strategic Plan 2016 (SD 2016/0060) (“**the Strategic Plan**”).

¹ [Isle of Man Future Energy Scenarios Report.pdf \(gov.im\)](https://www.gov.im/future-energy-scenarios-report)

² [LCA 3 FINAL March 2022.pdf \(unece.org\)](https://www.unece.org/lca-3-final-march-2022.pdf)



5. Within Chapter 12 of the Strategic Plan, (inter alia) Energy Policy 4 was adopted as a general planning policy. We copy the same for convenience: -
 - 5.1. *“Energy Policy 4: Development involving alternative sources of energy supply, including wind, water and tide power, and the use of solar panels, will be judged against the environmental objectives and policies set out in this Plan. Installations involving wind, water and tide power will require the submission of an EIA.”*
6. In a statement of 20 July 2022 submitted in an appeal against the approval of planning application 12/01315/B, planning officer Mr Paul Visigah provided an explanation of Energy Policy 4 relevant to the construction and installation of ground mounted solar panels: -
 - 6.1. *“1. ... Energy Policy 4 which states that “development involving alternative sources of energy supply, including wind, water and tide power, and the use of solar panels, will be judged against the environmental objectives and policies set out in this Plan. Installations involving wind, water and tide power will require the submission of an EIA”. The thrust of this policy is that scheme for the installation of solar panels and other renewable energy sources would be supported unless they fail to accord with the environmental objectives set out in the plan, the most relevant in this case being Environment Policies 1 and 2.”*
7. It is submitted that the principle of the Application will materially contribute to the following Environment Policies of Chapter 7 and the Environment Objectives at paragraph 3.3 Strategic Plan. Particularly, it is submitted that the Application will substantively contribute to the attainment of the following objectives: -
 - 7.1. 3.3(b) *“To protect, maintain and enhance the built and rural environment (including biodiversity).”*
 - 7.2. 3.3(g) *“To minimize environmental pollution to air, water and land.”*
8. In support of the position in paragraph [7] above, reference is made to the United Nations report *IPBES-IPCC co-sponsored workshop report on biodiversity and climate change* (24 June 2021)³, that reducing human induced climate change can reduce or arrest biodiversity loss, e.g. see page 15: -
 - 8.1. ***“(2) The mutual reinforcing of climate change and biodiversity loss means that satisfactorily resolving either issue requires consideration of the other.***
Climate change and biodiversity loss are closely interconnected and share common drivers through human activities. Both have predominantly negative impacts on human well-being and quality of life. Increased atmospheric greenhouse gas concentrations lead to increased mean temperatures, altered precipitation regimes, increased frequency of extreme weather events, and oxygen depletion and acidification of aquatic environments, most of which adversely affect biodiversity”
9. It is noted that paragraph 12.2.8 of the Strategic Plan 2016 states that the Department (ie. the Planning Committee) is fully supportive of the need for greater energy efficiency. It is submitted

³ [IPBES-IPCC Co-Sponsored Workshop on Biodiversity and Climate Change | IPBES secretariat](#)



that the Application's solar panels generating renewable electricity, will afford a more efficient use of energy (reducing consumption of electricity generated from the burning of gas (see paragraphs [2]-[3] above)).

9.1. *"The Department is fully supportive of the need to secure greater energy efficiency in new and existing development and has recently introduced additional energy efficiency requirements in the Building Regulations 2003. Energy efficiency and the use of renewable energy sources are covered in General Policy 2(m) of the Building Regulations."*

10. Further to the alignment, by the Application, of the indicated Environment Objectives of the Strategic Plan, reference is made to the following Aims and Objectives of Chapter 2 and Chapter 3 of the Strategic Plan that the granting of the Application would accord with: -

10.1. *"2.3" ... "Economic Progress Aim: To pursue manageable and sustainable growth based on a diversified economy."*

10.2. *"2.3" ... "Quality Environment Aim: To protect and improve the quality of the environment."*

10.3. *"3.2 Resources ...
(d) To support energy generation from renewable resources
(e) To embrace the principles of Sustainable Development i.e. development that meets the needs of the present without compromising the ability of future generations to meet their own needs."*

11. In addition to the precepts and principles of the Strategic Plan, reference is made to wider Government policy and the legal obligations of public bodies that are, it is submitted, material considerations in the adjudication of the Application.

12. Pursuant to the 'Isle of Man Climate Change Plan 2022-2027' (SD 2022/0065), the Council of Ministers of the Isle of Man Government committed to securing the supply of no less than 100% of the Island's electricity from carbon neutral sources by 2030.

13. It is submitted that the implementation of the Application will materially contribute to achievement of the electricity target.

14. Pursuant to section 10 of the Climate Change Act 2021 ("**the Climate Act**"), the Council of Ministers of the Isle of Man Government was under a legal burden to make regulations on or before 1 April 2022 to set a legal target to reduce emissions. Pursuant to the Climate Change (Interim Target) Regulations 2022 (SD 2022/0053) and Climate Change (Interim Target) (No.2) Regulations 2022 (SD 2022/0204), interim targets are enshrined in law to reduce the Isle of Man greenhouse gas emissions from a 2018 Baseline, by 35% by 2030 and by 45% by 2035. It is submitted that the implementation of the Application will materially contribute to the achievement of the interim targets.



15. Pursuant to section 21 of the Climate Change Act 2021, the Department of Environment, Food and Agriculture must act in compliance with the climate change duties relevant to public bodies.

- 15.1. “21 Climate change duties of public bodies
*(1) A public body, in performing its duties, must act in the way that it considers best to contribute to —
(a) the meeting of the net zero emissions target by the net zero emissions target year;
(b) the meeting of any interim target;
(c) supporting the just transition principles and the climate justice principle;
(d) sustainable development, including the achievement of the United Nations sustainable development goals; and
(e) protecting and enhancing biodiversity, ecosystems and ecosystem services.”*

16. It is understood that the Planning Committee, in adjudicating upon the Application must act in compliance with the legal duties enshrined in section 21 of the Climate Change Act. It is submitted that the reasons cited herein above (inter alia the mitigation and amelioration of the consequences of climate change realised by the decarbonisation of electricity generation) are material considerations for the Planning Committee in complying with the duties under section 21 and granting the application sought.

17. As above, we consider that the reasons stated herein are material considerations for the Planning Committee in support of the granting of the permission sought.

Yours sincerely

Isle of Man Green Party

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