**Policy Consultation and Political Styles: Renewable energy consultations in the UK and Denmark**

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**Abstract**

There is a discussion among political scientists about the extent to which there are differences in policy styles between western European states,including in particular whether they share common means of consulting and deciding policy through policy networks. This paper studies the differences in policy consultation approaches between Denmark and the UK in the case of renewable energy. It further examines whether consultation patterns differ in the policy formation and the policy implementation phases. It is found that while in both Danish and British cases there is decision-making through policy communities there are still some clear differences in the ways in which consultation takes place and decisions made at both the levels of policy formation and policy implementation.

**Key words:** consultation; renewable energy; Denmark; UK

This paper compares policy styles in the UK and Denmark in the case of consultation over renewable energy policies. Discussion over the nature and significance of differences in policy styles is itself a subject of interest among political scientists. Greer and Jarman (2008, 168) describe political styles as such: ‘Analytically, a policy style is an outcome. If a political system chooses the same options over and over again in different fields, that is a product of its internal functioning.’

Although there has been much debate about differences in policy styles (Richardson (ed) 1982, Lijphart 1999) much of this has been about issues such as the prevalence of single party or multi-party coalitions, and general discussions about modes of decision-making in particular countries or agencies in countries. In fact little work has been done to directly compare decision-making in a particular policy zone across countries using specific examples of law making and local implementation – that is as opposed to comparison of generalised national traditions (eg Atkinson and Coleman 1989) or . general characteristics of power relations within and between the policy networks (Kriesi et al 2006). Cairney has compared policies between Westminster and Scottish Government (Cairney 2009, 2011a, 2011b), but this is still a comparison within the one country.

Yet if a full discussion of differences in policy styles is to be done, or at least one that can evaluate differences between policy styles in different countries, it is important to undertake comparative study of consultations in particular policy zones which involve analysis of specific sets of laws and patterns of local implementation. Then we can trace and compare policy processes effectively. That is what we do here. The key research question we ask is if there are differences in policy styles in this case study (of renewable energy in Denmark and the UK) and how these differences manifest themselves. A contrast between the UK and Denmark has been selected since these two countries appear to be candidates for differing policy styles, with Denmark being identified as having a ‘consensual’ policy style (Green-Pedersen and Thomsen 2005), whilst the UK is traditionally seen as involving an ‘adversarial’ policy style (Flinders 2005). In light of this, our concern here is to examine the extent to which such a distinction manifests itself in practice in the renewable energy sector, and second, what significance this may have in terms of generating different outcomes.

Renewable energy is chosen partly because it is a relatively new area of policy, and thus, arguably, its outcomes are reliant on less established traditions than some other policy areas and also because it is a cross-cutting issue, involving more than one area of policy. Here, our principal focus is on explaining the significance of the difference in policy style rather than studying how the differences in policy outcome (renewable energy deployment) emerge themselves. In looking at consultation, the point at which a decision is made is very important (for eg by central or local government) as this structures the nature and effect of any consultation, so decision-making at both central and local levels is examined.

The research for this paper has been derived from a combination of research interviews, the inspection of government documents and statistics and,the study of reports and statements issued by trade associations, companies and NGOs, as well as statements made in news media. Existing secondary analyses were also inspected. The interviews themselves were selected in order to fill in details of consultation mechanisms in both countries not covered by other sources. These (nine) interviews included representatives of leading renewable energy interests, energy trade associations in the UK and Denmark, energy NGO activists and also climate policy advisors to the two governments.

To begin with below, we contrast some theory about differences in policy styles. Then we proceed to a comparison of consultation over renewable energy policy in Denmark and the UK before discussing its implications for the debate that has just been outlined. In discussing renewable energy we focus more specifically on wind power. This is because wind power constitutes the bulk of new renewable energy developments in both countries, and narrows down the area of detail that we wish to compare. We find that there are some notable differences in policy style between these countries. In Denmark there has been a (mainly successful) effort to obtain policy consensus through discussions between interest groups and the main parties (government and opposition) before formal proposals are laid before Parliament. In the UK consultation occurs after proposals are made by the Government without attempts to reach consensus first. In addition the system of consultation on planning matters is rather more centralised and ‘top-down’ in the UK compared to Denmark.

**Distinctive Policy Styles?**

Some accounts argue that there is a distinctiveness about British policymaking compared to other states (Marsh 2008, 2012, Marsh et al 2003, and Flinders 2005, Lundaberg 2013). Such accounts tend to emphasise a tendency towards ‘adversarial’ decision making. Some analyses discuss how this process occurs in the context of ‘asymmetrical’ power relations in the UK, thus emphasising ‘ hierarchy, rather than networks’ (Marsh 2010, 41) and ‘a context marked by structural inequality’ (Marsh, 2012, 48).

Others, however, argue that there are relatively minor differences in patterns of decision-making between western European countries (Richardson et al 1982). Cairney (2008, 368) argues that this common approach to policymaking ‘is based on the logic of consultation and the benefits of reaching a consensus with interest groups rather than imposing decisions’. There will only be occasional controversial exceptions which he calls ‘politically contentious themes that dominate media attention’ (Cairney 2008, 354) where there will be ministerial interventions. This is as opposed to issues which are ‘humdrum’, involving policy communities making decisions on policy details with civil servants discussing these details with the relevant interest groups. Such research builds on earlier studies, such as Jordan *et al* (1994), Jordan and Schubert (1992) and Jordan and Richardson (1982). Cairney and Jordan (2013)emphasise such conclusions and argue against the idea of British ‘exceptionalism’.

What may be cast as a further distinction is made by Bevir and Rhodes (2003) in a direct comparison between the UK and Denmark. In Denmark there is, on the one hand, ‘a participative tradition characterised by associational politics’, and, on the other, a ‘negotiated economy’ where the centre has to persuade other actors rather than impose solutions (Bevir and Rhodes 2003, 102-103). Hence central government, and other actors, are constrained by the system of government from imposing policies, and bottom-up governance is more natural to the Danish system than to the British system.

Analysis of Danish politics also offers conditional confirmation of the ‘consensual’ policy style of Danish politics. Green-Pedersen and Thomsen (2005, 165), in a study of Danish parties, government formation and Parliamentarianism in the 1973-2003 period argue that ‘broad cooperation has, during the entire period, been the dominant means of passing legislation in Denmark’. Even so, research on interest group access implies that some interest groups have more privileged access to government than others, owing to possession of resources including money, employees and network links (Binderkrantz, Christiansen and Pedersen 2014).

**Outlining key issues**

In order to examine differences between policymaking processes in the UK and Denmark we need to unpack this theory so that we can studytermsof how the differences in policy style that have been discussed manifest themselves in this particular empirical area of renewable energy. In particular we want to examine whether the foregoing theory about alleged distinctiveness of British politics to continental styles holds true. Key themes of this distinctiveness are the degree of consensus in policy formulation, tendencies towards hierarchy and centralisation in policy formulation and implementation, and the role of ministers and policy communities. From these themes we developed a set of specific issues that will guide our analysis, contrasting renewable energy consultations in the two countries.In the succeeding sections we examine these issuesin order to respond to our overall research question about differences in policy styles on renewable energy consultations.

1. Adversarial vs. consensus:

Here we look at the extent which, in the two cases, there is cross party involvement in the construction of policy proposals. Specifically, we look at the processes of consultation that involve the interest groups and the political parties. Hence we study whether, and the extent to which consultation mainly happens when the Government formulates the initial proposals, or whether the Government formulates a set of proposals without discussing them with opposition parties. In this case the opposition and a wide set of interest groups only become involved in consultation after a set of formal proposals are published. This process is associated with claims made by analysts such as Marsh (2008, 2012, Flinders 2005)). Alternatively there could be a ‘consensus’ approach whereby legislation is formed through discussions between government, opposition and relevant interest groups, as described by analysts such as (Green-Pedersen and Thomsen 2005). 2. Degree of hierarchy in policy formulation:

Here we examine the degree to which consultation is organised in a ‘top down’ or ‘bottom-up’ way. This will help us decide the extent to which notions of ‘hierarchy’ can be applied to the UK than other continental examples, as implied by Marsh (2008, 2012) and others. For example, a ‘top-down’ approach is characterised by ministers settling policy choices and then a wider set of interest groups being consulted. It may be that under this model a narrow set of interest only maybe consulted at this stage of ministerial agenda-setting. A ‘bottom-up’ approach is characterised by government talking to a broad set of interest groups at an early stage before proposals are formulated and proposed. A further area of study is the extent to which there is a ‘meso-level’ of activity whereby issues are mainly decided by consultations between the civil servants and the interests groups without ministerial involvement except to rubber stamp decisions taken at this ‘meso-level’.

These are keys issue since the matter of the extent which the UK is ‘exceptionalist’ in deviating from a ‘norm’ of most decisions being made by policy communitiesis a matter of some controversy among theorists, with Cairney and Jordan (2013) arguing against the notion that British decision-making is very much different from continental practice. So, therefore, it is important to study the extent to which, in this issue, in the case of the UK especially, decisions are made in policy communities between interest groups and civil servants, - or whether ministers are making decisive interventions in the policy process. This research will throw light on the extent to which the theorists discussed earlier are right in talking about hierarchy and centralisation in the case of the Uk compared to examples such as Denmark.

1. Role of expert advice

A key issue to be considered here is the role of expert advice. We need to study how this expert advice is constituted – the degree of independence it has from government, and the degree of independent in particular, academic, advice that is involved as opposed to advice that is commissioned on a party political basis. We should study the use of the experts and the degree to which they are integrated in the policymaking process.

4. Degree of centralization in implementation. We need to study policy consultation at the local level. Planning decisions are particularly relevant here.We need to examine whether local government has independent powers of decision-making. Do local government institutions have the ability to refuse to implement schemes otherwise sanctioned by policies influenced by centralised policy decisions? Alternatively, does the centre have the power to override the wishes of local government bodies? In studying this we can judge the extent to which we can contrast the UK as being more centralised compared to Denmark, as argued by theorists such as Bevir and Rhodes (2003).

**Renewable Energy Consultation in Denmark**

In this section we study consultation in renewable energy policymaking and implementation in Denmark. In implementation we focus on windfarms since, as discussed before, this constitutes the bulk of renewable energy deployed in Denmark. . Denmark was a leader in developing renewable energy, especially wind power, in the 1970s and 1980s, and is still a leading manufacturer of wind turbines. Renewable energy development was inspired at least partly by the anti-nuclear movement as an alternative to nuclear power as a method of counteracting the oil crisis. In 1985 Denmark, which until then did not have any nuclear power, eschewed any development of nuclear power in favour of programmes of renewable energy and energy efficiency (Meyer 2004).

Danish renewable energy has expanded from providing practically no electricity in the 1970s to providing around 40 per cent of Danish electricity in 2013, the bulk of this coming from windpower which provided around 30 per cent of Danish electricity consumption (Danish Energy Agency 2014). Until the beginning of this century this development mainly occurred through locally owned wind turbines, first predominantly cooperatives, and later mainly farmer owned.

This ‘bottom-up’ development was supported by planning regulations for wind power which largely restricted development to locally owned turbines. Development slowed after the installation of a right wing coalition at the end of 2001.The policies in the first years of the right-wing coalition government explicitly aimed to curtail what was seen as ‘empire-building’ by the prominent former Environment and Energy Minister, SvendAuken (Funch 2006). Reflecting a change in focus, policy in support of renewable energy was reformulated with a greater emphasis on cost-effectivenessas well as a greater market orientation(IEA 2006; Jakobsen 2007). For instance, electricity companies were released from obligations to buy electricity from renewable sources at fixed prices (Nielsen and Pedersen 2013).

This reduced incentives for onshore wind power development, and while plans for offshore windmill parks were also scaled back from five to two in 2002 (Jakobsen, 2007),the majority of new wind development in the succeeding years has been offshore (Toke 2002, Ryland 2010).In fact, in a 2004 agreement two of the offshore projects were re-adopted. Finally, the planning regulations were changed, abolishing the preference for locally owned projects. Even so, albeit with a rather high level of rhetorical conflict over environmental and energy policy, policy making remained largely consensual with broad political participation in most of the energy policy agreements that were adopted in the following years (Jakobsen 2007; Energistyrelsen (2014). But, wind power installations largely stalled, leading to opposition demands for a more ambitious renewable energy policy (Politiken 2007).

EU and international pressures for greater action to deal with energy shortages and action on climate change were key pressures to increase incentives for wind power. A new Renewable Energy Act in 2008 introduced new incentives for wind power and also for solar photovltaics (pv)for households (Retsinformation.Dk 2008).This legislation was agreed by all of the parties in the Danish Parliament (Folketing) apart from one party - the Red-Green Alliance - following contentious and drawn out negotiations. The agreement covered only the short term, i.e. through 2011.

At the same time, a policy process involving a longer term energy strategy began with the establishment in 2008of an expert ‘Climate Commission’, as laid out in the Government’s inaugural program (Regeringen 2007).This was in the context of perceptions that the governing parties needed to cultivate a ‘greener’ image, the upcoming COP15 conference to be held in Copenhagen, as well as discussions in the European Union on renewable energy targets that eventually led to a Directive in 2009 mandating member states to achieve ambitious targets for renewable energy deployment.

Academics formed the membership of this 10-person Commission, appointed according to areas of expertise with about half of the members being economists and the other half representing different natural science disciplines. The Chair of the Commission was a professor with expertise in how biological mechanisms remove carbon dioxide from oceans. The task given to the Commission was to investigate ‘how the government’s long-term vision o fcompletely freeing Denmark from dependence on fossil fuels can be achieved in practice’ (Klimakommissionen 2010, 3).As such, its mandate was framed primarily in terms of securing energy independence, but taking into account other objectives including, reductions in greenhouse gas emissions, and increasing the share of renewable energy sources while containing socio-economic costs (Klimakommissionen; interviews).Moreover, theCommission’s proposals had to reflect the EU energy policy framework.

In the fall of 2010the Commission produced 40 recommendations, based on a large body of scientific background analyses and modelling exercises. The Commission concluded that the objectives of a fossil-free energy system and significant CO2 reductions could be achieved at a relatively low cost and primarily through promotion of renewable energy and increased energy efficiency. The recommendations set the course towards the 2050 objective of an energy system independent of fossil fuels. Specific recommendations included a uniform tax on fossil fuels to improve energy efficiency and to enable a switch to renewable energy sources. The Commission also emphasized the need for a firm and predictable energy policy course, including a political declaration on gradual energy tax increases to the level necessary to achieve the policy objectives. These included a considerable expansion of renewable energy, particularly offshore wind power. The Climate Commission’s report was followed by a Government strategy entitled ‘Energy Strategy 2050’ published in February 2011(Klima- og Energi-ministeriet 2011). Proclaiming alignment with the approach of the Climate Commission, the strategy set out initiatives projected to reduce fossil fuel use by 33 per cent of 2009 levels by 2020 and to increase the share of renewable energy to 33 per cent of total energy.

Policy discussions concerning a new renewable energy law continued, cutting across the General Election of September 2011. A consensus was reached in March 2012 among all the parties represented in the Danish Parliament with the exception of the Liberal Alliance, that is 170 out of 179 MPs (Energiaftalen 22. marts 2012).The agreement, which covers the period until 2020,offered new incentives for onshore and offshore wind power, solar power and other renewable energy fuels (Act no. 576 of 18th June 2012 and Consolidation Act no. 1330 of 25th November 2013).The aim is to have 50 per cent of Danish electricity generated from wind power by 2020. This will be supplemented in the renewable energy sphere by biomass, particularly biogas. A public consultation on the proposal prompted relatively scant public debate; a total of 40 organisations commented on the proposal during the public consultation, mainly business organisations and energy companies and organisations. (Energistyrelsen 2012).The main discussions had already been held earlier in the run-up to the cross party agreement between Government and opposition that preceded the legislation passed in 2012. These discussions included the politicians and the industrial interest groups concerned with renewable energy and electricity companies (interview Danish Energy Association).

The main trade associations, particularly the Danish Wind Energy Association (representing wind power developers) and the Danish Energy Association (representing the electricity production and distribution companies) lobbied the political parties prior to the agreement (interviews with representatives of the Danish Energy Association and the Danish Wind Energy Association).Other members of the policy community dealing with renewable energy include the Biogas Trade Association, nature protection groups, academic institutes and DONG, the state owned oil and gas corporation, which has investments in renewable energy.The semi-autonomous Danish Energy Agency is influential in discussions about costs, incentive levels and modes of implementation. Also, the Confederation of Danish Industry, the leading organisation representing business interests, were active participants in the public debate leading up the agreement. The Confederation put public pressure on the Liberal and Conservative parties to enter into a broad agreement, arguing that consensus around the energy policy was necessary in order to ensure a stable investment climate among Danish businesses (Jyllands-Posten 2011). On the other hand a business association of large energy users publicly worried that the parties would come up with an agreement that would increase energy prices (Jyllands-Posten 2012).

The overall cost of the agreement was an important issue in the negotiations between the political parties. The new right-wing opposition announced early on that they would not agree to the proposal put forward by the centre-left government. The general tenets of the proposal were quite similar to the agreement put forward by the Liberal and Conservative parties when they were in government and implemented many of the recommendations suggested by the Climate Commission, but calculations showed that the new proposal would cost DKK 5.3 billion or about DKK 2 billion higher than what had been proposed by the previous government. The cost of the final agreement was close to the demands of the opposition (Weekendavisen 30th March 2012). The right-wing opposition,including the Liberal Alliance, demanded that the amount of planned offshore wind energy be reduced in order to cut costs. Some cuts were made, but the Liberal Alliance nevertheless did not sign the inter-party agreement.

The new law came into effect in the summer of 2012. Negotiations in this phase took place primarily among the government, represented by Climate and Energy Minister Martin Lidegaard, and finance and/or energy spokesmen of all opposition parties. Interest organisations were also quite active in the media during this phase, but most of their input on the substance of the agreement was given earlier, when the original proposals were worked out (Interview, Danish Wind Energy Association 16/07/2013).There was controversy over the effect of an increase in solar photovoltaics (pv) installations on the costs to electricity distribution companies who were responsible for paying premium incentives, and the electricity industry pressed the government to reduce the incentives for new solar pv installations, which was achieved in November 2012 (interview with representative of Danish Energy Association, 31/07/2013).

Thus it can be argued that a policy community including the electricity industry and renewable energy trade groups significantly influence policy formulation and national level implementation of Danish renewable energy policies. However this is done through a consensus system. This operates on two levels in this case. First, a consensus policy was drafted by the government, with recommendations first delegated to the Climate Commission led by, and consisting of, academic experts. Second, the details were decided by a policy community including the main political parties, not just government parties, as well as interest organisations.

*Implementation*

Renewable energy has been funded through what has been termed a ‘feed-in tariff’ system whereby generators are assured payment of fixed subsidies for a given amount of production in the long term. Under the incentives introduced since 2009 this involves renewable generators being paid a supplemental incentive to that which they receive from sales of the electricity on wholesale electricity markets. However, renewable energy policy still has to be implemented through the planning system, otherwise projects will not be constructed. Danish energy planning is set out in planning laws such as the Planning Act (LBK 587 27 May 2013) and the Circular on planning and zoning permissions for windmill installations (Cir1h no. 9125 of 22 May 2009). Until 2013, around two-thirds of electricity generated from wind power came from onshore installations. The bulk of future development to expand wind power capacity is projected to be sited offshore, although a substantial proportion of existing onshore wind turbines will be replaced by new models ([Energistyrelsen](http://www.ens.dk/) 2013a). Planning for offshore windfarm development is organised by the national government. However, there is an effort to inject local participation in the sense that around 30 per cent of the planned new offshore windfarms are in so-called ‘near-shore’ sites, and in these cases 20 per cent of the shares in the schemes will be offered to people living in areas closest to the wind farms.

Onshore developments are planned by municipalities. There is a strict zoning policy set out. Onshore, building of power stations of 100 MW or more(of whatever fuel) is effectively restricted to 15 designated sites. The national government and the local municipalities co-decide planning consent issues for power plant of between 25 MW and 100 MW,that is they both have to give consent for a project to go ahead. In the case of power plants below 25 MW the decision is taken by the municipalities. In Denmark windfarms are usually in this category. Municipalities are required by law to allocate areas for the development of wind turbines, although many schemes proposed within these areas will still be refused planning consent.

Local planning problems have always beset windfarmdevelopment. The Government does not keep records of windfarm approval rates, but widespread rejection of proposals for windfarms by municipalities is clear (Interview with PrebenMaegaard 30/08/2013). Recently, some municipalities have dropped windmill areas from their municipal plans in response to public opposition, although these decisions are being challenged by the national authorities.This is in parallel with the decline of local ownership of wind projects since the 1990s and early 2000s. In those days wind power projects which were organised by local farmers or cooperatives and sited in areas designated by the local municipalities were liable to receive planning consent (Toke 2002).However, in recent times the developers are mainly companies based outside the locality. Nevertheless, according to the Renewable Energy Actthe development companies are required to offer 20 per cent of their shares to local peoplefor windmills taller than 25 meters(consolidated act no. 1330). This requirement was introduced to promote local acceptance, but a 2011 evaluation showed that sales of shares had succeeded in only about half of the projects and primarily to a few larger investors (Energistyrelsen 2011). Final planning decisions are taken by the local municipalities. Citizens who want to contest decisions to grant planning consent can take their case to the Nature Protection and Environmental Board of Appeal who will decide cases according to whether correct procedures have been observed. However, judgements will not be made on issues of substance, for example whether or not a windfarm conforms to landscape protection criteria.

Hence to sum up the empirical section on Denmark, we can say that the theories, espoused by Bevir and Rhodes (2003) concerning relative decentralisation and political authority residing with local government. are borne out in this case. Windfarm implementation in Denmark is characterised by a considerable degree of local control. National authorities cannot override local authorities when it comes to planning decisions about specific projects. In addition to this local part-ownership of windfarm schemes is mandatory.

Moreover, Denmark seems to follow a consensual pattern (rather than adversarial) of political deliberation at the policy formation stage, as indicated in the theory concerning Danish policymaking (Green-Pedersen and Thomsen 2005) and in line with a distinction between ‘consensus’ and ‘adversarial’ systems such as the UK (Flinders 2005). This is indicated by the involvement of the government and opposition political parties (together with the main interest groups) in the design stage of the legislative proposals for renewable energy. Politicians are involved in the key decisions about policy along with the relevant interest groups. This suggests a more prominent role for the politicians in this case compared to those who might argue that the bulk of decisions are normally taken by civil servants talking to interest groups (Cairney and Jordan 2013). The formal public consultation stage is of relatively small importance compared to this initial agreement to policies.

**Renewable Energy Consultation in the UK**

The UK was relatively slow to promote renewable energy and it was in 1991, following privatisation of the electricity industry, that the first commercial schemes were organised. However, the early programmes were relatively small (Mitchell and Connor 2004). It was in 2002 that the UK Government established the Renewables Obligation (RO) which, including later amendments, aimed to supply at least 20 per cent of UK electricity from renewables by 2020. This is a ‘market based’ scheme under which electricity companies were set an obligation to generate increasing amounts of electricity from renewable energy. They receive financial penalties for each unit of energy that they fail to generate towards their target. By 2013 renewable energy supplied around 11 per cent of electricity in the UK, the majority of that coming from wind power, two-thirds onshore and one third offshore. Biomass, including material used in coal fired power stations converted to burn biomass, accounts for much of the rest of this 11 per cent (DECC 2014a).

The most recent major reform of renewable energy involves consolidation of incentives for low carbon sources in ‘Electricity Market Reform’ (EMR).We shall focus on this change. EMR involves adopting a type of ‘feed-in tariff’. Low carbon electricity generators are assured of receiving a set price over the long term, with different technologies being given different set prices and differing contract lengths. The reform includes both renewable energy and nuclear power (for which previously premium prices were not available).

At the time of the adoption of EMR in 2013, there was consensus in the UK among the biggest three parties, Conservatives, Liberal Democrats and Labour, about the need to give incentives to low carbon sources including renewable energy, nuclear power and carbon capture and storage, although there are differences in emphasis among the parties. Conservatives were initially cool in their response to the ‘Renewables Obligation’ introduced by the Labour Government in 2002.

However, after David Cameron became Leader he was keen to pursue a ‘green’ agenda, and this included adopting the renewable energy targets. This included the policy of promoting onshore windpower, although this policy was not always popular among the backbenches. The Liberal Democrats were enthusiastic about renewable energy, but they were opposed to offering premium prices to new nuclear power stations prior to joining the Coalition Government in 2010. In addition, the Labour Government, which left office in 2010, had promoted the objective of building new nuclear power stations, but they had not reached the stage of proposing that they be offered premium price contracts. However, policy discussion documents issued just before they left office did point in this general direction (OFGEM 2010; HM Treasury and DECC 2010).

The Committee on Climate Change (CCC) also made parallel proposals as part of their role to comment on progress towards achieving carbon budgets. This body was set up as a result of the 2008 Climate Change Act. Academics form the large majority of the Governing Board of the Committee, but do not lead the organisation. The CCC is headed by a political appointee of the Government. At the time of writing the incumbent is Lord Deben, a former Conservative MP and environment cabinet minister. The Committee has a permanent Secretariat, with some of the officials being former civil servants themselves. Its CEO (David Kennedy) has worked with the UK Government and the World Bank before, although he holds a PhD.Amongst its activities the CCC was asked to prepare advice in order to try to resolve differences in emphasis between the coalition partners over nuclear power (interview with representative of CCC 16/12/2013). The body which prepared for the establishment of the CCC contained one or more representatives of British Energy, the company owned by EDF which runs most nuclear power stations in the UK (Davies 2011).

There is an academically based energy research organisation in the form of the UK Energy Research Council (UKERC). The role of this body is to organise energy research and disburse funding for various research purposes rather than advise government on its policy proposals or implementation, although individual academics can, and sometimes do, make inputs into government consultations about energy policy.

Some key outlines of what emerged as EMR appeared in the Coalition Agreement made between the Conservatives and Liberal Democrats before they formally took office (Cabinet Office 2010, 16-17). This implies ministerial involvement in setting out the strategic framework constituting the later legislation. The Conservative-Liberal Democrat Coalition produced a ‘green’ ‘consultative’ document outlining its proposals for Electricity Market Reform in December 2010 (DECC 2010). The CCC’s ‘Fourth Carbon Budget’ (Committee on Climate Change 2010) was published just a few days before the publication of the Government’s Green Paper on EMR, and it seemed to contain broadly similar proposals. The Government’s proposals had not been subject to formal (or so far as we can see, informal) discussions with other parties. Indeed, even the biggest electricity industry trade group, Energy UK, was not itself involved in discussing the proposals before they were published (interview with representative of Energy UK, 7/08/2013).However, major electricity companies had embedded influence with Government, much more so than compared with environmental groups (Unsigned 2011).

The Select Committee covering Energy and Climate Change proved to be a principal channel for discussion of the proposals after they were published. The Select Committee took (both written and oral) evidence from various industrial interests and experts concerned with promoting low carbon energy sources. The Select Committee published three reports during the progression of the legislation through Parliament. Each report acted as a sounding board for key industrial demands, which were conceded by the Government after the Select Committee issued its findings. In the aftermath of the discussions about the ‘green paper’ the Committee called for incentives to be layered according to the needs of particular technologies. At that (‘green paper’) stage of the discussions it was feared that nuclear power (which initially was widely thought to be clearly cheaper than other non-fossil alternatives) would dominate the incentives relative to renewable energy sources if a ‘one size fits all’ solution was implemented (Energy and Climate Change Committee 2011).

The second Select Committee deliberations focussed on demands from renewable and nuclear interests for the government to guarantee that the feed-in tariff payments would actually be made, as the Government initially hoped this would be handled by a company owned by the National Grid (Energy and Climate Change Committee 2012). The third report focussed on how nuclear power could be funded and it recommended that the Government offer loan guarantees to developers (Energy and Climate Change Committee 2013). It is notable that key recommendations made by the Select Committee on these issues eventually were incorporated into the primary legislation, or the secondary legislation that followed. However, such changes seem to have been prompted by lobbying by ‘insider’ energy-industrial groups who had been involved in providing advice for the initial proposals, but for whom the degree of promised intervention by government had not gone far enough.

The Government also held consultations over various technical aspects of EMR. In addition to consultations over EMR there were also consultations over changes to incentives organised under the Renewables Obligation up to 2014. The RO was to run concurrently with the EMR regime as this was phased in during a transitional period from 2014-2017. Public tensions emerged between the Treasury (headed by a Conservative) and Department for Energy and Climate Change (headed by a Liberal Democrat) over funding of onshore wind, with the Treasury wanting lower incentives comparing to DECC. These tensions appeared to involve conflicts between an apparently more pro-renewable energy Liberal Democrats and pressure from Conservative backbench MPs that was more sceptical towards onshore windpower (Pickard and Chazan 2012). The consultations over changes to RO incentives seemed to be dominated by this inter-party clash.

Disputes over the role of onshorewind power between the coalition partners were endemic. John Hayes, aConservative sceptic of onshore windfarms (which are unpopular amongst many Conservative MPs) was appointed as a (junior) energy minister in October 2012. However he appeared to clash with the main renewable trade association (RenewableUK) and he was re-shuffled away from the Energy portfolio in March 2013. Later on, in April 2014, Liberal Democrat leader Nick Clegg was said to have ‘blocked’ plans by the Conservative Party to stop new windfarms being built after 2020 (Mason 2014).Reports indicated that the Conservatives were planning to withdraw funding from new onshore windfarms after 2020, but to continue to fund offshore wind farms and also solar power on rooftops.

In 2011 there was also a controversy over a cutback in payments for solar pv which was done, according to the solar industry without any consultation (Vaughn et al 2011). It seems that expansion of the pv sector had been more rapid than expected and Treasury ministers in particular were concerned about the cost implications. The Government lost a judicial review on the subject and had to postpone the implementation of some aspects of the rate changes.

As in the case of Denmark, to date the majority of British wind farms are onshore, although an increasing proportion are being built offshore. Offshore windfarm consents are considered by central government, as in Denmark, with the difference that, unlike Denmark, in the UK there are no regulations mandating the offer of shares to people living locally to relatively near-shore windfarms. However, in 2013 the Department for Energy and Climate Change undertook discussions with RenewableUK with a view to gaining a commitment to ensuring that projects involved offers of community benefits and/or share offers equivalent to 5 per cent of the value of the projects (DECC 2014b).

Planning controversies concerning renewable energy are very common in the UK. There is little tradition of local ownership, although recently regulations have been proposed encouraging developers to give local benefits such as support for local schools. Planning policy for windfarms consists of guidelines set by central government superimposed on standard planning law for developments, with central government(s) steering the actions of local government planning authorities.

In fact there are four sets of planning systems; for England, Scotland, Wales and Northern Ireland, with each of these ‘countries’ having central-local relations, England’s centre being fused with that of the quasi-federal Westminster. These planning policies vary in some details, and have been changed from time to time, but they all require local authorities to take into account the contribution of renewable energy to national policy in favour of renewable energy development (although in England’s case this was weakened in 2012). Wales is the only area to specifically allocate areas favourable for windfarm development, with a presumption against windfarm development outside these areas. It is true that devolution of power to these governments represents decentralisation to sub-national governments, but it should be noted that the centralised nature of relations with local government has nevertheless been replicated in these arrangements. In this sense a distinctive British ‘centralist’ policy style is maintained.

These planning strategies set the structure in which local authorities take decisions about renewable energy developments below 50 MW. However developments larger than 50 MW are considered by the governments themselves (Westminster, in the case of England and Wales, but otherwise devolved to governments in Scotland and Northern Ireland).In addition to this even if a proposal (under 50 MW) is refused planning consent by a local authority the developer can appeal against the decision on an issue of policy substance as well as a question of procedure. Again, a Public Inquiry will be held and the Government will appoint an Appeals Inspector who will reconsider the application. Local authority refusal is usually on ‘landscape’ grounds, an issue which is very much prone to interpretation, and the Inspector may take a different view to that of the local planning authority. Objectors cannot make an Appeal against a local authority giving consent to a project. Following the General Election of May 2015 the Conservatives announced that they would launch legislation to ensure that in England proposals for windfarms over 50 MW would be considered by local councils as the primary panning auythority, although developers would still have the right of appeal (Carpenter 2015).

In reality the majority of onshore windfarm planning applications, when counted by generating capacity, as opposed to number, are decided by the central government, either directly through central government decisions because they concern larger projects, or indirectly through central government consideration of planning appeals. For example, around two thirds of onshore windfarm planning applications in Scotland are over 50 MW in size (Scottish Government 2014), and around two-thirds of windfarms are constructed in Scotland. In addition to this, many proposals rejected by local authorities will be decided at Appeal by Planning Inspectors appointed by central government.

Indeed, it may be plausible to argue that in effect, all renewable energy planning decisions are highly influenced, if not actually decided, by central government since local planning officials will advise councillors making planning decisions on the likelihood that their decisions will fit in with national planning guidelines, and therefore whether their decisions will be upheld by the government on appeal. According to Toke (2005, 1529), the ability to appeal meant that whilst local authorities initially refused consent to 60 per cent of windfarm planning applications considered principally by local authorities (projects no more than 50 MW in size), after appeals were taken into account the proportion of such schemes refused planning consent fell to 45 per cent.

As can be seen from the foregoing argument there is evidence for the ‘adversarial’ model of political decision making (Flinders 2005) in the British case given that legislative proposals were drawn up by government in discussions with a limited range of interest groups. Following there was a meaningful consultation process in the sense that there was criticism of the proposals which led to changes in them. The strictures on hierarchy and centralisation in UK politics made by Marsh (2008, 2012) and Bevir and Rhodes (2003) are borne out by the limited participation in the drafting of the initial proposals for Electricity Market Reform and in the planning process which gives the central government the final verdict if developers which to appeal against rejection of schemes at the local government level.

**Discussion**The key research question here is whether there is evidence, in this case, of differences in policy style between the British and Danish systems. The answer is ‘yes’. There is clear evidence for difference in the case of central-local relations in policy implementation. There is also evidence of difference in the case of policy formation, although there is room for debate over whether this difference is formal or whether it can lead to substantially different outcomes..

In the case of policy implementation, elative British centralisation of authority is evident in the British planning system for renewable energy when compared to Denmark. In Denmark power is more decentralised to local authorities, in a context where the room for discretion by any level is limited by a sort of planning ‘constitution’ which identifies where developers can, or cannot propose to install power plants. By contrast, the UK gives, in effect, much greater discretion to developers to propose schemes where they wish, and gives the ability of the government to support the developers when it is moved to do so. By contrast, Denmark gives less discretion to developers, and the growth of renewable energy and wind power in particular has, historically, mainly been advanced through local involvement in windfarm ownership.

A clear distinction between the two countries emerges in the much greater emphasis on ‘bottom-up’ development and consultation in Denmark, whilst in the UK consultation is done in a ‘top-down’ fashion, with the centre ultimately having the final say on governmental planning decisions in case of disputes over local authority decisions. This may imply that not only is the UK more centralised, but arguably also more reliant on hierarchical relationships. Planning power is nowadays more devolved than it was in the case of Scotland and Wales (and also Northern Ireland), but this devolution seems to create a new pattern of central-local relations between devolved central governments and local government rather than decentralising power to local government. Certainly, this difference in policy style does offer the real possibility of a substantial difference in policy implementation outcomes.

The picture at a national policy formation level also shows signs of differences of policy style in that in Denmark there was an effort, successful in the most recent renewable energy legislative cycle in 2010-2012, to obtain policy consensus among the parties on legislative proposals. By contrast, in the UK there is the appearance of a more adversarial system in that the Government generates proposals without any prior attempt to secure the agreement of the Opposition. Certainly, there is convergence between the two systems when the formal consultation stage is included, with there being a thorough process of consultations and Select Committee hearings in the case of the UK – which appears to be more comprehensive than in the case of Denmark. In both cases there is ministerial intervention at a policy formation stage (in the Danish case extending to ministers in waiting from the opposition). However such intervention only seems to be effective in securing policy change when it coincides with the wishes of key industrial interest groups.

Overall, both systems are subject to consultation through policy communities. However the policy community consultations are structured differently. This example suggests that in the case of the UK there is potential for initial policy proposals to be tailored to suit interests that are closest to the civil service and governing politicians, whereas in the case of Denmark, this possibility is militated by all of the major interest groups having access to the non-governing parties before the proposals are formulated. Indeed, in the case of Denmark, the policy cycle began outside of government with a report by an independent Commission led by academics. In the UK, the nearest substitute to the Climate Commission in Denmark is the Committee on Climate Change. This gives independent advice, but this independence is conditioned by the fact that the leadership of this body is entrusted to a political appointment. On the other hand, the British system involves a public and rigorous process for consulting over government proposals involving a select committee hearing system that is not paralleled in the case of Denmark.

In this policy area there was relative consensus among the main parties anyway, so it is not clear that a different policy style would lead to a substantial policy difference in practice. But nevertheless, a distinctive British policy style is still evident, and if policy style is an outcome per se, then a difference exists.

Conclusion

In conclusion, in the case of policy implementation through central-local government relations, there is clear evidence of what has been called the ‘strong’ (Marsh et al 2003) or ‘centralised’ nature of British politics compared to other political systems (Bevir and Rhodes 2003). There is also evidence of differences in policy style between Denmark and the UK at both policy formation and policy implementation levels.

In this case study it should be remembered that the broad outlines of policy are supported by party consensus in both countries. Yet,p olicies will be chosen by policy communities that involve politicians, not just civil servants operating to implement ‘humdrum’ decisions. It is evident that in both the UK and Denmark politicians have been widely involved in making key decisions about renewable energy policy.This in itself tends to contradict notions that most decisions are humdrum ones involving reaching agreement between interest groups and civil servants. Moreover, this case study also demonstrates that it is difficult to pidgeon-hole a policy issue as ‘controversial’ or not. Certainly, wind power is often controversial at the planning level, but it is debateable how controversial the renewable energy legislation has been at a national level compared to other types of legislation. It is a matter of debate as to how typical the policy conditions in this case study actually are, and therefore the extent to which this case points in the direction of suggesting that differences in policy styles are associated with regular differences in types of political outcome. However, it also seems clear from the evidence that in this comparative case study there is then possibility for hierarchical guidance of policy in the UK compared to Denmark where policymaking is made in a less adversarial and more consensual format. Certainly the Evidence from this comparison suggests that the institutions that underpin policy communities can be different in different countries and that such patterns constitute a clearly discernible difference in policy styles. As we have suggested in the introduction, there is a dearth of this type of study. Hence further studies comparing policymaking and implementation styles using specific cases of policy construction and local implementation would be needed to be completed to establish how generalised our arguments may be.

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