

Appendix – Full Draft Plan Policies 59-61 with N&N Soc Suggested Amendments

Renewable and low carbon energy

11.69 Increasing the amount of energy from renewable and low carbon technologies will help to reduce greenhouse gas emissions to slow down climate change. The planning process has an important role in the delivery of new renewable and local carbon energy infrastructure in locations where the local environmental impact is acceptable. One of the Strategic Objectives of the Core Strategy seeks to make Northumberland resilient to climate change and contribute to mitigating its effects.

11.70 The NPPF states that all communities have a responsibility to help increase the use and supply of renewable and low carbon energy. However, the need for renewable and low carbon energy does not automatically override environmental considerations, such as landscape, heritage and local amenity, and the planning concerns of local communities. One of the Strategic Objectives of the Core Strategy seeks to manage the prudent use of Northumberland's natural resources, including energy, while minimising adverse impacts on communities, [landscapes](#) and the environment.

11.71 Northumberland has the potential to provide renewable energy from a number of sources, such as onshore wind (where substantial provision has already been made), solar, [biomass](#), [biogas \(especially Anaerobic Digestion\)](#) and hydro. The Core Strategy and subsequent planning decisions therefore need to balance the generation of renewable and low carbon energy with the need to protect the Northumberland's environment and communities from any significant adverse impacts associated with development.

Assessing proposals for renewable and low carbon energy development

11.72 Reflecting current national planning policy, the approach to renewable and low carbon energy in Northumberland is to provide a positive policy framework recognising that it can make a valuable contribution to slowing down climate change. Criteria-based policies are proposed which set out that renewable and low carbon energy proposals will be supported if [the effects on the environment and local communities are acceptable](#).

11.73 An overarching policy on renewable and low carbon energy development is proposed (Policy 59). Although specific policies have been included for assessing onshore wind energy and solar farms because of potential pressure for their development, the overarching policy is applicable to the consideration of all proposals for renewable and low carbon energy development. Proposals for renewable and low carbon energy will also be assessed in the context of the other policies in the plan, including those relating to the landscape and the natural, built and historic environment.

11.74 The Council acknowledges that Northumberland has a range of energy resources and that the County has already made a significant contribution in the delivery of renewable energy, particularly through wind energy schemes. Given the scale of renewable energy development already constructed, or with planning consent, further schemes have the potential to further [and adversely](#) impact on the special character of

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Deleted: and make sure the UK has a secure energy supply and stimulate investment in new jobs and businesses

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Comment [1]: See Theme (1) in the Introduction. "Security" is increasingly accepted as resolved. The statement referring to it is, or soon may be, inaccurate. The reference to the stimulation of investment & employment is potentially misleading as it is not clear what adverse effects, in those terms, renewable energy developments may have in other sectors. In addition, there is increasing evidence of business failure associated with "wind" developments (e.g. Clipper Windpower's Britannia Project at Blyth and the associated propeller blade-plant on Tyneside).

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Comment [2]: An applicant's ability to "demonstrate" is only part of the picture. It implies that Officers may be inherently likely to accept the predictable opinion of the applicant's experts when far more stringent scrutiny should be expected. In any event, surely it is the wider planning picture which is important.

On the next deletion, the words removed are superfluous and may compromise preparation of the proposed SPG. Other authorities, including the Lothians, Scottish Borders and Cornwall, have found that a landscape capacity approach is the only effective development control approach to the proliferation of smaller turbines.

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Deleted: The Core Strategy does not propose to identify areas for renewable and low carbon energy development. The NPPF advises Local Planning Authorities to consider identifying areas where this would help secure development of such resources. It is not considered that identifying areas would help secure the development of renewable and low carbon energy development across Northumberland. The criteria based approach was supported through both the Issues and Options and Preferred Options (stage 1) consultations.

the County. The Council considers there is a limit to the scale of [wind turbine](#) development that can be accommodated across Northumberland in general and in some local areas in particular, without significantly adversely affecting the special landscapes and cultural heritage of Northumberland, as well as the amenity of its residents.

11.75 The criteria within the policy, therefore, seek to protect those environmental and cultural assets ([specifically, the County's landscape](#)) that are important to Northumberland, its communities, economy and visitors. A significant change from the draft policies within the Preferred Options (stage 1) document and the proposed policy approach is that the draft policy does not differentiate between different scales of development. The matters in the policy will be applicable to all proposals but the level of information required in support of a planning application will be proportional to the scale of the proposal, its location and its potential effects.

11.76 The Sustainability Appraisal and the Habitats Regulations Assessment recognised that the protective wording of the policy criteria seek to provide protection to environmental assets and minimise impacts. Minor amendments have been made to address some of the detailed comments made and improve clarity.

11.77 The policy has also been amended to reflect the potential role that community-led initiatives might have in providing local benefits; it provides a positive policy approach to such projects [where there is](#) clear evidence of local community involvement, leadership and support. Neighbourhood Plans provide an opportunity for communities to plan for community led renewable energy developments.

Policy 59

Renewable and low carbon energy development

In plan-making and assessing development proposals, the strategy for the development of renewable energy and low carbon energy development is to support and encourage proposals in appropriate locations [where they will](#) contribute to energy generation and a reduction in emissions of greenhouse gases. Particular support will be given to renewable and low carbon energy developments [that demonstrate a significant contribution to energy generation and reductions in emissions of greenhouse gases and](#) where there is clear evidence that proposals are community-led and [supported](#).

Through the development management process, applicants will be required to satisfactorily demonstrate that the environmental, social and economic benefits of the proposal clearly outweigh any significant adverse effects, individually or cumulatively, on local communities and the environment ([including the landscape](#)). In considering applications, appropriate weight will be given to the following:

- a. Landscape character [and sensitivity and the sensitivity of receptors within a given landscape](#);

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Comment [3]: See Theme (6) in the Introduction.
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Comment [4]: These changes, the Society suggests, avoid the repetition of assumptions which, if correct, need not be re-stated because they add nothing to the policy, &, if not, should be avoided.

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Comment [5]: See Theme (4) in the Introduction.

- b. The special qualities and the statutory purposes of the Northumberland National Park, North Pennines Area of Outstanding Natural Beauty and the Northumberland Coast Area of Outstanding Natural Beauty;
- c. Internationally, nationally and locally designated nature conservation and geological sites and features, and protected habitats and species;
- d. Hadrian's Wall World Heritage Site and other internationally, nationally and locally designated heritage assets and their settings;
- e. Air, and ground and surface water quality;
- f. Hydrology and water supply;
- g. Highways and traffic flow, transport networks, Public Rights of Way and non-motorised users, including the effects upon well-used recreational routes such as the National Trails, long distance routes and the national cycle network;
- h. Amenity due to noise, odour, dust, vibration or visual impact;
- i. The openness of the Green Belt and whether very special circumstances have been demonstrated to justify otherwise inappropriate development;
- j. The impact of any new grid connection lines and any ancillary infrastructure and buildings associated with the development;
- k. That satisfactory provision has been provided for decommissioning and removal of temporary operations once they have ceased; and
- l. The predicted energy output of the proposal.

All proposals need to consider cumulative impact. When identifying cumulative landscape impacts, considerations include: direct, indirect and sequential effects as well as temporary and permanent impacts. When assessing the significance of landscape impacts a number of criteria should be considered, including: the sensitivity of the landscape and visual resource, the sensitivity of the receptor(s) and the magnitude or size of the predicted change.

Onshore wind energy

11.78 Northumberland has experienced considerable development pressure for onshore wind farms in Northumberland in recent years.

11.79 Given the pressure for development across Northumberland and recognising that there are a number of planning issues which are specific to wind turbine development, a criteria based policy for this technology has been developed to help guide and assess proposals that may come forward over the plan period. The criteria in Policy 60 are in addition to those criteria that are identified in Policy 59, which apply to all renewable energy proposals. Applicants are required to submit sufficient information in support of their planning application to allow a full and robust assessment to be made of the likely

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Comment [6]: See Theme (8) in the Introduction.

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Comment [7]: See Theme (4) in the Introduction.

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Deleted: Onshore wind energy is now an established and common technology for generating renewable energy in the UK. The availability of this technology for deployment, the availability of financial incentives and the presence of a wind resource in

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Comment [8]: The deleted text is, the Society suggests, superfluous. The reasons for the pressure are irrelevant for policy purposes. The references to "wind resource" & "financial incentives" are particularly inappropriate because the County does not have a particularly significant "wind resource" & "incentives" are not specific to the County. (see Themes (1) &(5) in Introduction.

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effects of the proposal. The level of information required will reflect the scale and nature of the proposal ⁽¹³²⁾.

11.80 The Council has received a significant level of response to draft policy criteria for wind energy development that were proposed during previous consultation on the emerging Core Strategy. One of the main concerns expressed through the consultation process was the impact of wind turbines on the landscape of Northumberland, which is recognised as an important asset of the County. The Council has recognised that onshore wind turbines represent a significant force for [adverse](#) change [to](#) the landscape of Northumberland.

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11.81 The Council has undertaken a study to understand the landscape and visual effects of the current operational wind farms in Northumberland. The early findings of the work recognise the importance of considering the effects on long and medium range views from and to iconic landscapes and heritages and the outlooks for heritage assets. This is recognised in the revised draft policy.

11.82 Another area of concern identified during the consultation process has been the potential [adverse](#) impact of wind farm development on the tourism economy in Northumberland. Northumberland's landscape, natural and historic environment and tranquillity are a key for draw for visitors. Inappropriate wind turbine developments have the potential to adversely affect these assets and could therefore impact on the tourism economy, if people are dissuaded from visiting/ returning [or such developments deter investment or divert it to other areas where turbine development is less extensive or obtrusive](#). In light of the concerns expressed, the Council has commissioned two pieces of work ⁽¹³³⁾ to help understand the effects of onshore wind farms on tourism to inform the policy in the Core [Strategy](#).

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Comment [9]: See Theme 2, above.

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11.83 [While the findings of the work are not conclusive on the question of any significant negative or positive impact caused by wind turbines on tourism, it is to be noted that the desk-top study was limited by its historic focus. This inevitably ignored the growing size of proposed turbines, the cumulative impact of successive but as yet un-built schemes and the potential impact on competition between, say, Northumberland and the Lake District, as wind turbines become increasingly prevalent in the former as compared to the latter. The survey indicated some adverse harm in terms of propensity to invest, highlighted that some landscapes may be more sensitive to wind farm developments than others and that development could have localised negative effects in relation to tourism. It emphasises the need for developments to be well-sited in relation to the landscape setting and the tourism economy context of the locality. The draft policy recognises the considerations relating the landscape and the natural and historic environment, matters that are important for tourism. The protection of these assets is also seen as being important in protecting and supporting the tourism sector.](#)

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11.84 Across Northumberland a very significant amount of wind farm development has either already taken place, been consented or is in the planning system, therefore cumulative impact is a key issue and this is a matter that will require careful consideration. In considering cumulative impact [existing development, including](#)

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development under construction; approved development awaiting implementation; and proposals submitted as planning applications awaiting determination [will all be relevant](#).

11.85 To add more detail to the policy on onshore wind energy a supplementary planning document will be prepared [as soon as possible](#). It is intended that this document will include more guidance on the requirements of the policies including issues relating to landscape sensitivities, important viewpoints and cumulative impact.

Policy 60

Onshore wind energy

In plan-making and assessing development proposals, the development of single wind turbines or groupings of turbines will be supported where ~~the social, environmental and economic benefits of the proposal clearly outweigh any significant adverse impacts, both individually and cumulatively, upon the criteria set out in Policy 59 and the additional requirements set out in this~~ [policy](#).

Through the development management process, applicants will need to provide evidence to satisfactorily demonstrate that:

- a. There is sufficient separation from the proposed wind turbines to protect residential amenity [from](#) noise, shadow flicker and visual intrusion. To protect visual amenity, there will be a presumption against development within a distance of six times the turbine blade tip height of residential properties unless it can be demonstrated that the presence of turbines would not have an unacceptable impact upon living conditions;
- b. The proposals have addressed any potential adverse effects on the safety of aviation operations and navigational systems;
- c. Potential interference to television and/or radio reception and information and telecommunications systems will be avoided and/or mitigated;
- d. The proposed site access arrangements and access routes will be suitable for the construction phase, including the delivery of turbine components and construction materials, the operational phase, and the decommissioning of the proposed wind farm;
- e. The proposed wind turbines are located appropriate distances from highways, railway lines and/or Public Right of Ways to provide a safe topple distance. A minimum topple distance of the turbine height plus 10% is recommended as a starting point;
- f. Provision has been made for the satisfactory decommissioning of the turbines and associated infrastructure once the operations have ceased and the site can be restored to a quality of at least its original condition;
- g. The proposal will not result in unacceptable harm to the character of the landscape and the landscape has capacity to accommodate the proposed

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Comment [10]: As with the use of the deleted words in para 11.72, an applicant's ability to "demonstrate" is only part of the picture. It implies that Officers may be inherently likely to accept the predictable opinion of the applicant's experts when far more stringent scrutiny should be expected. In any event, surely it is the wider planning picture which is important.

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development taking account of potential adverse harm to receptors within a given landscape;

h. There will be no significant adverse effects on long and medium range views to and from sensitive landscapes, such as the Cheviot Hills, Northumberland Sandstone Hills, Northumberland Coast AONB, North Pennines AONB and the Hadrian's Wall World Heritage Site, and lines of sight between iconic landscape and heritage sites and features, particularly where one or more feature is within the Northumberland Coast AONB, the North Pennines AONB or the adjoining Northumberland National Park;

i. There are no significant adverse effects on sensitive or key viewpoints; and

j. There are no significant adverse effects on important recognised outlooks and views from and to heritage assets.

Within the Northumberland Coast AONB and the North Pennines AONB there will be a presumption against proposals involving more than one turbine or proposals involving turbines with a height, measured to the blade tip, of over 20 metres and that are not visually associated with existing buildings and not designed to generate power for use at those premises.

All proposals need to consider cumulative impact. When identifying cumulative landscape impacts, considerations include: direct, indirect and sequential effects as well as temporary and permanent impacts. When assessing the significance of impacts a number of criteria should be considered, including: the sensitivity of receptors, the landscape and visual resource and the magnitude of the predicted change.

Solar photovoltaic farms

11.86 Solar farms are large-scale arrays of photovoltaic cells that convert sunlight into electricity. They are differentiated from micro-generation, the small-scale generation of energy by individuals or businesses to meet their own needs. Solar farms can cover large areas of land, typically between one hectare and 100 hectares, and are usually developed in rural locations or on large brownfield sites. They can also be mounted on the roofs of existing buildings.

11.87 A number of solar farms have recently been permitted in Northumberland and a number of further schemes are expected to come forward. Solar farms have therefore been identified as a technology where there is likely to be future development pressure. A criteria-based policy has been therefore been prepared to consider any proposals for solar farms in Northumberland that may come forward over the plan period.

11.88 In line with the overarching approach to renewable and low carbon energy in Northumberland, the policy is supportive of the development of this renewable technology where it can be demonstrated that the proposals, whether individually or

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Comment [11]: See Theme (4) in the Introduction.

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Comment [12]: The deleted term opens an argument as to how well used a viewpoint might be. 'Key viewpoints' echoes SNH guidance on the selection of 'key' and 'representative' viewpoints.

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Comment [13]: See Theme (9) in the Introduction. **The Society considers this proposed alteration (see the following deletion) as, perhaps, the most important of those it now recommends.**

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Comment [14]: As NCC acknowledges, this figure was taken from the Pennine AONB guidance which related to a totally different landscape type. As the Society previously noted, in the Preferred Options consultation: East Lothian Council has carried out detailed professional studies on what scale of turbine is acceptable in various landscape types ('East Lothian Supplementary Landscape Capacity Study for Smaller Wind Turbines' 2011, plus amendment 2012: [http://www.eastlothian.gov.uk/info/206/planning-advice_and_guidance/1130/renewable_ene](http://www.eastlothian.gov.uk/info/206/planning-advice_and_guidance/1130/renewable_energy/4)

[rgy/4](http://www.eastlothian.gov.uk/info/206/planning-advice_and_guidance/1130/renewable_ene_rgy/4)). The proposed 25m hub height falls within ELC's typology C band:

"3.3 Four principal development typologies are considered as follows:

- Typology A: Turbines between 65m and < 120m high

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Comment [15]: Sequential cumulation is also critical. We have frequently seen

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cumulatively do not have a significant unacceptable adverse effect on the natural and historic environment of Northumberland and local amenity.

11.89 Key environmental considerations for solar photovoltaic farms relate to whether the use is an effective use of the land, landscape and visual impacts, which includes the impact of glint and glare on the landscape. In addition there could also be impacts on drainage, and archaeology. The sensitive siting of these developments and the use of well-planned screening as a means of mitigation are important in addressing these concerns. The use of previously developed sites, non-agricultural land that is not of high environmental value or poor quality land is encouraged. The nature of the proposals means that proposals can allow for continued agricultural use where applicable and also provide opportunities for biodiversity improvements, which are encouraged.

Policy 61

Solar photovoltaic farms

In plan-making and assessing development proposals, the development of solar photovoltaic farms and other solar developments will be supported where the applicant can demonstrate that the proposal is an effective use of land and that the social, environmental and economic benefits of the proposal clearly outweigh any significant adverse impacts, both individually and cumulatively, upon the criteria set out in Policy 59 and the additional requirements set out in this policy.

Through the development management process, applicants will need to provide evidence to demonstrate that:

- a. Where a proposal involves greenfield land, whether:
 - i. the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land;
 - and
 - ii. the proposal allows for continued agricultural use where applicable and/ or encourages biodiversity improvements around arrays.
- b. The proposal, including the impact of security measures such as lights and fencing, will not result in significant harm to the character of the lands

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Comment [16]: See Themes (1) & (5) in the Introduction.