

## SPD Questions

### Q 1. Do you agree that the SPD should be expanded to include renewable energy technologies other than onshore wind energy?

**No. In our opinion this SPD is not required *in toto*.**

It largely duplicates, and needlessly elaborates, criteria which had already been identified in earlier iterations of the Core Strategy. The only possible justification for this exercise is as a gateway to further supplementary planning guidance mentioned in the 'Core strategy Pre-submission Draft - Proposed Major Modifications'.

This repeatedly cites the DCLG written ministerial guidance as the mainspring for commissioning a spatial study to identify "suitable areas for wind energy development" (11.). For example, MAJ/11/22 states that NCC will "seek to identify suitable areas". Yet the SPD scoping is coy about mentioning this, despite the fact that the excision of previously agreed criteria such as the limit to turbine heights in the coastal AONB (Major Modifications MAJ/11/24, Policy 66: Onshore wind energy) implicitly requires that this is addressed in a supplementary capacity study.

Nowhere is it suggested in the ministerial guidance that such areas should be *newly* identified. Indeed, national planning guidance implicitly discourages unnecessary SPD's: "Any additional development plan documents should only be used where clearly justified..." (Para 153, NPPF). No other planning authorities are, as far as we are aware, seeking to do so as part of their emerging local plans post the new ministerial guidance.

NCC seeks to justify the SPD exercise by stating that, "It is considered to be appropriate to seek to identify suitable areas for wind energy development in order to 'have a positive strategy to promote energy from renewable and low carbon sources' as required by the NPPF. **If suitable areas are not identified it would, in the context of the Written Ministerial Statement, unnecessarily limit opportunities for community-led initiatives and proposals of a smaller-scale that would help individual homes or businesses to meet their energy needs.**" [added emphasis] (MAJ/11/22. Paragraph 80C).

The claim is that this is, "For consistency with national planning policy and to reflect the written ministerial statement". The letter and spirit of the ministerial guidance is aimed at devolving powers to local communities, not central planning authorities. Other LPA's are leaving it to local communities to seek to identify any such areas in neighbourhood plans.

There is additional confusion in the statement regarding 'individual homes or businesses'. Individual homes and businesses would, except in wholly exceptional circumstances, seek to use renewables which fall under Permitted Development Rights introduced on 6 April 2008 in England, further extended in 2011 to cover the noise limits for air source heat pumps and wind turbines. Commercial agricultural schemes can be addressed by using the criteria which have already been identified in earlier iterations of the CS.

Throughout this scoping document we see a criteria-based approach set out which is at odds with the spatial approach to identifying "suitable areas" for wind development set out in the Major Modifications document. Indeed, nowhere is this specifically mentioned in the scoping document.

Farmers building biomass or AD systems do not need spatial guidance as these can be installed in any farm building complex. Additional criteria regarding feedstock supplies and transport can easily be satisfied by normal planning criteria.

The only possible candidate for a spatial approach is solar PV in field arrays. But this is also being addressed by national guidance and is sufficiently addressed by normal planning

## SPD Questions

criteria as supported by the major modification of the CS as set out in MAJ/11/25, Policy 67: Solar photovoltaic farms.

### Q2. Question 2

**Do you have any comments on the suggested structure of the Renewable Energy SPD?**

In our view the structure is overly complex and unnecessary. The criteria can be sufficiently addressed with the proposed modifications to the CS.

### Question 3

**Do you agree that the most appropriate option is to structure the guidance by technology with guidance on each topic below it? If no, what would be a more appropriate alternative option?**

No. In our view the structure is overly complex and unnecessary. The criteria can be sufficiently addressed with the proposed modifications to the CS and in neighbourhood plans.

### Question 4

**Do you have any comments on the list of renewable energy technologies that have been identified to be included in the SPD?**

In our view there is no necessity to attempt to provide detailed planning guidance for any of these technologies nearly all of which can be addressed by general planning criteria.

Northumberland is acting after the event, just when development pressure from problematic technologies (wind and solar PV) has reduced due to national guidance and reduction in subsidies. The identification of community-led schemes can be left to local communities and neighbourhood plans.

The now generally preferred technologies of biomass and biogas (AD) currently coming forward are farm-scale projects which are accommodated within the normal scale of farm development and operations. Larger projects would fall within the criteria for any industrial development.

There is hardly any pressure for hydro due to resource availability.

### Question 5

**Do you have any comments on the suggested content of the guidance for onshore wind turbine developments?**

In our view the suggested content was adequately addressed in the criteria set out in earlier iterations of the Core Strategy.

Most of the content areas are already set out in the standard check-list for prospective planning applicants. Most are also the responsibility of other agencies: examples include ecology, water environment, flood risk, aviation, noise and traffic, highways and public rights of way.

## SPD Questions

### Question 6

#### **Do you have any comments on the scope of the further work on landscape sensitivities and onshore wind turbine developments?**

In our view, and that of most experts and LPAs, the ministerial guidance does not require that such areas should be newly identified. Indeed, we have not found any other planning authorities that are, post the new ministerial guidance, seeking to do so as part of their emerging local plans.

The letter and spirit of the minister's guidance seeks to devolve powers to local communities, not central planning authorities. Other LPA's are leaving it to local communities to seek to identify any such areas in neighbourhood plans.

NCC seeks to justify the SPD exercise by stating that, "It is considered to be appropriate to seek to identify suitable areas for wind energy development in order to 'have a positive strategy to promote energy from renewable and low carbon sources' as required by the NPPF. **If suitable areas are not identified it would, in the context of the Written Ministerial Statement, unnecessarily limit opportunities for community-led initiatives and proposals of a smaller-scale that would help individual homes or businesses to meet their energy needs.**" [added emphasis] (MAJ/11/22. Paragraph 80C).

This does not make sense and is not sound. The fresh identification of "suitable areas", far from encouraging "community-led initiatives", actually goes against the principle of localism and may work against local community-led initiatives. Local communities should be allowed to identify and take forward such initiatives in neighbourhood plans.

We have long experience in Northumberland of the errors and confusion caused by previous attempts to identify "suitable areas for wind energy development" through capacity studies. These resulted in 'areas of least constraint' being identified post hoc in areas of applications and interpreted by the wind industry as areas of presumed consent. Numbers of applications in these areas were recommended for approval by the authority only to be eventually refused due to adverse impacts that had not been properly identified in the capacity studies.

Many parish and town councils see this as mirroring previous attempts by the Planning Authority to centralise planning control and weaken local input.

Individual homes and businesses would, except in wholly exceptional circumstances, seek to use renewables which fall under Permitted Development Rights introduced on 6 April 2008 in England, further extended in 2011 to cover the noise limits for air source heat pumps and wind turbines.

Commercial agricultural schemes can be addressed by using the criteria which have already been identified in earlier iterations of the CS.

It should also be noted that the burden of the ministerial guidance has been to reduce pressure for onshore wind development, which already exceeds 2020 fiscal and capacity targets. This reduction has already happened, and is clearly seen in Northumberland where fresh applications have largely ceased.

If Northumberland goes ahead with this, it is likely to re-awaken development pressure from remaining wind developers who have given up on other areas of England where ministerial guidance has been interpreted differently. We have previously experienced this with the way the RSS was developed under the influence of wind industry consultants.

## SPD Questions

### Question 7

**Do you have any comments on the suggested content of the guidance for solar photovoltaic farms?**

In our opinion the guidance within the CS, set out in the major modification at MAJ/11/25, Policy 67: Solar photovoltaic farms, is entirely adequate to address the issues.

### Question 8

**Do you have any comments on the suggested content of the guidance for hydro power?**

There is hardly any pressure for hydro due to resource availability and the issues can be addressed entirely by normal planning criteria as set out in the CS and by neighbourhood plans.

### Question 9

**Do you have any comments on the suggested content of the guidance for biomass?**

In our opinion the guidance within the CS is entirely adequate to address the issues.

The biomass and biogas (AD) currently coming forward are farm-scale projects which are accommodated within the normal scale of farm development and operations. Larger projects, such as at the Windmill Industrial Estate, in Cramlington, would fall within the criteria for any industrial development.

The only problem identified in other areas with large numbers of AD or biomass units seems to have been with cumulative pressure on transport networks from feedstock supply movements. This would also fall within normal planning criteria.

### Question 10

**Do you have any comments on the suggested content of the guidance for anaerobic digestion?**

In our opinion the guidance within the CS is entirely adequate to address the issues.

The biomass and biogas (AD) projects currently coming forward are farm-scale and are most usually accommodated within the normal scale of farm development and operations. Larger projects would fall within the criteria for any industrial development.

The only problem identified in other areas with large numbers of AD units seems to have been with cumulative pressure on transport networks from feedstock supply movements. This would also fall within normal planning criteria.

### Question 11

**Do you have any comments on the topic areas that have been identified for the planning application process to be included in the SPD?**

There is no mention of criteria for acceptability test for wind applications, as set out in the Ministerial Statement HCWS42.