

Statement of Consultation

South Worcestershire Development Plan

Renewable and Low carbon Energy Supplementary Planning Document

February 2018

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Malvern Hills District Council, Worcester city Council and Wychavon District Council have prepared a joint draft Renewable and Low Carbon Energy Supplementary Planning Document (SPD). The draft SPD is based on the joint South Worcestershire Development Plan (SWDP) policy SWDP 27: Renewable and Low Carbon Energy.

The consultation arrangements are in line with the Town and Country Planning (Local planning) (England) Regulations 2012, and the Councils' Statements of Community Involvement (SCI) 2014. [Note that the SCIs are current out to consultation on a review of their contents].

Consultation on scoping report:

A consultation on a Scoping Report for this SPD (i.e. ideas on what the particular content of the SPD should be) was launched for six weeks from 13th February 2017 to 27th March 2017.

In summary, responses were received from 10 respondents. These included:

- 2 from the development industry
- 1 from the Environment Agency
- 1 from the woodland trust
- 1 from Worcestershire County Council, covering a range of responsibilities
- 1 from Natural England
- 1 from Network Rail
- 1 from Worcestershire Wildlife Trust
- 1 from Historic England
- 1 from a Worcester City Councillor

These responses have shaped the content of the SPD.

The Scoping Report consultation was not a required statutory stage but represents good practice. The consultation was advertised via a press release, placed on the Worcester City, Malvern Hills and Wychavon Councils' websites, and placed on the South Worcestershire Development Plan web site. A summary of the comments received and responses that have shaped the SPD are recorded in the table below.

Consultation on Strategic Environment Assessment (SEA)

In addition to the Scoping Report a draft SEA joint Screening Statement for five SPDs was sent to the statutory consultees, namely the Environment Agency, Natural England and Historic England, for comment in March 2017. Responses were received from all three statutory consultees with the conclusion that the SPDs would be unlikely to have any significant environmental impacts. Comments were also provided by Worcestershire County Council, which drew a similar conclusion

Consultation on this draft SPD

Following on from the scoping report consultation, the draft SPD was drawn up and consulted upon with other officers internally, and with County Council officers.

The draft has been revised and will be formally presented to each Council, as follows, for approval for a six week consultation.

It will be considered by the following Committees:

Committee	Date
Worcester City Council: Planning Committee	14 th December 2017
Wychavon Planning Committee	14 th December 2017
Wychavon Executive Board	10 th January 2018
Malvern Hills Executive Board	23 rd January 2018

When signed off for consultation it is intended that the SPD will be published for the formal Regulation 13 consultation for six weeks, from 2nd February 2018 until 16th March 2018.

Who will be consulted?

The consultation will take place with a range of individuals and bodies in line with the adopted Statements of Community Involvement (SCI) of each Council. Electronic versions of the draft SPD and supporting information, and hard copies will be provided as follows;

- a) Consultation with the public: Hard copies of the draft SPD and response forms will be supplied for reference at the following libraries and Customer services centres:

- Malvern Hills Customer Services Centres at Malvern, Tenbury Wells and Upton-upon-Severn; Libraries at Malvern, Tenbury Wells and Upton-upon-Severn.
- Worcester City Council the 'Hub' at the Hive, Worcester.
- Wychavon Community Contact Centres at Pershore, Evesham and Droitwich; Libraries at Evesham, Droitwich, Pershore and Broadway.

b) Statutory Consultees are outlined in the SCIs and include:

- The County Council
- Parish and Town Councils
- Adjoining Parish and Town Councils
- The Police and Crime Commissioner
- The Local nature partnership
- The Coal Authority
- The Environment Agency
- English heritage
- Natural England
- Network Rail
- The Highways Agency
- Relevant utilities
- The Homes and Communities Agency

c) Individuals and voluntary bodies and community groups, and local businesses on the SWDP database will be contacted by email / letter.

This Statement of consultation will be updated as the progress on the SPD is reported.

The table below outlines the responses to the Scoping report Consultation, and how the SPD has taken on board the comments made.

Renewable and Low carbon Energy SPD- Summary of Responses to Scoping Report

Ref No.	Name	Organisation	Summary of comment	LPA response
1	Tessa Jones	Environment Agency	<p>In consideration of the various sources of renewable energy, with regards to ground source heat systems we would offer the following comments which could help to inform developers and include within the SPD.</p> <p>There are two types of ground source heat systems: 'closed loop' and 'open loop'. In general, open loop systems require more detailed assessment, planning and regulation.</p> <p>We expect all developers to follow the Environment Agency's (EA) published environmental good practice guide (EGPG), which details the environmental risks of all types of schemes and how these can and should be mitigated. The EA will require a risk assessment for both the abstraction and discharge from the regulated schemes. The EA expect developers to assess risks for schemes that are not regulated and should be made aware of proposals on contaminated land or in a Source Protection Zone (SPZ) 1.</p>	<p>Noted. Planning issues and requirements related to "closed" and "open" loop systems will be addressed in SPD.</p> <p>Noted. The SPD could provide a web link to the EA Environmental good practice guide.</p> <p>Noted. The SPD could refer to the fact that the EA require developers to do a risk assessment for regulated schemes.</p>
2	Nick Sandford	Woodland Trust	<p>We would like to see the spd encourage opportunities for a wide range of renewable energy technologies, including biomass and in particular the use of wood as a fuel.</p> <p>Bioenergy can offer huge carbon savings, since the carbon emitted by burning biomass or biofuels is balanced overall by the carbon taken in by the crops as they grow. However, the carbon and environmental costs of growing, harvesting, transport and processing, need to be taken into account.</p>	<p>Noted</p> <p>Noted</p>

		<p>The Woodland Trust supports the development of small-scale, local biomass projects such as wood-fuel heat and power, which minimise the costs and carbon emissions associated with transport.</p> <p>To ensure that bioenergy delivers genuine greenhouse gas savings, without negative environmental impacts, it must be subject to a robust system of assurance or certification. For the production of woody biomass this means UK Woodland Assurance Standard and Forest Stewardship Council certification, but there is currently no equivalent for agricultural crops. Any certification system must be internationally agreed to avoid the problems simply being pushed overseas</p> <p>Current evidence is that the greatest potential greenhouse gas savings can be achieved through burning of woodchip to generate heat, gasification of biomass to produce electricity and the use of second generation biofuels produced from biomass. The Woodland Trust would therefore like to see bioenergy policies place greater emphasis on the use of woody biomass crops for these purposes, rather than on agricultural crops such as sugar beet and wheat for the production of biofuels</p> <p>We believe that woodland owners can benefit from the developing markets for wood fuel and that income streams generated would help owners deliver environmental and social benefits from their woods to society. Developing a market for low-grade timber through wood fuel projects could also make other woodland management operations with a high biodiversity benefit more economically viable, for example the restoration of planted ancient woodland sites currently under non-native conifers.</p> <p>Use of timber from existing woodland can play an important role in sustaining rural communities, providing employment opportunities in timber harvesting and transport and supply chains. Government estimates that a medium scale 20MW wood-fired power plant (supplying energy for around 20,000 homes) would provide full-time</p>	<p>Noted</p> <p>Noted. Certification is not within the remit of the SPD</p> <p>Noted. The policy does not promote one form of energy saving or biomass over another.</p> <p>Noted. This is beyond the remit of the SPD</p> <p>Noted. This is beyond the remit of the SPD</p> <p>Noted</p>
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			<p>employment for 48 permanent staff and significant short-term employment opportunities. We favour development of smaller plants serving around 5,000 homes which would still provide significant economic benefits to local communities. This would help to support the forestry sector and would offer valuable diversification opportunities for farmers.</p>	
3a	Colin Morrison	Turley, on behalf of Taylor Wimpey	<p>Taylor Wimpey is very concerned with regards to the Councils recent decision to apply the 10% energy reduction target with Policy SWDP 27 to both regulated and unregulated energy. We do not believe that this decision is supported by national or local policy nor a suitable evidence base in accordance with Paragraphs 173 and 174 of the National Planning Policy Framework (The Framework).</p>	<p><u>Re:Inclusion of regulated and unregulated Energy not supported by national or local policy</u></p> <p>Disagree. Neither the Planning & Energy Act nor NPPF say anything about any requirements for renewable energy in new developments being from regulated energy only.</p> <p>Some other local planning authorities have renewable and low carbon energy policies which relate to energy as a proportion of total (regulated and unregulated) energy.</p> <p><u>RE:Inclusion of regulated and unregulated energy not supported by evidence base</u></p> <p>Disagree. When the SWDP Viability Assessment was being prepared, the draft wording of SWDP27 related to renewable and low carbon energy sufficient to reduce regulated CO2 emissions by at least 10%. However, the Viability Assessment did not test the policy specifically against a requirement for regulated energy. The Viability Assessment model was on the basis of “a solar installation (without specifying that this would be to meet a proportion of regulated energy only) being likely to add £2,000 to £5,000 or so to the costs of a home, depending on the scale of the installation and the details</p>

			<p>During the EIP the Inspector did not refer to the need for Policy SWDP 27 to address unregulated energy given the clear commitment in the Plan for Growth₄ which stated that the Building Regulations and housebuilders should only be accountable for the energy use covered by Building Regulations (i.e. regulated energy) and not the energy resulting from cooking or plug in electrical appliances. This has been the clear policy position since 2011 and hence no debate was necessary given there was no policy or evidence to justify the inclusion of unregulated energy.</p> <p>Furthermore it is important to note the specific wording of SWDP 27 which states that;</p> <ul style="list-style-type: none"> • <i>To reduce carbon emissions and secure sustainable energy solutions, all new developments over 100 square metres.....generation of energy from renewable or low carbon sources equivalent to at least 10% of predicted energy requirements...</i> <p>As stated above, national policy and the Building</p>	<p>of the scheme selected". The Viability Assessment also made a link between the environmental standards of housing and the price buyers are willing to pay.</p> <p><u>SWDP Inspector did not refer to the need for Policy SWDP 27 to address unregulated energy</u></p> <p>Noted. The policy is not tied to Building Regulations and there is nothing in the policy to say that unregulated energy should not be included. The original (draft) policy related to Building Regulations and regulated energy, but the SWDP Inspector recommended that SWDP 27 be de-coupled from Building Regulations and deleted reference to regulated energy. The SWC consider that total energy costs are important to consider.</p> <p><u>Re:Plan for Growth and regulated energy</u></p> <p>SWDP 27 is not linked to any commitment for Growth. The purpose of SWDP 27 is to reduce south Worcestershire's carbon dioxide (CO2) emissions, promote energy security for the future and reduce vulnerability to rising fuel costs.</p> <p><u>RE:Unregulated energy cannot be predicted</u></p> <p>Disagree. Using Standard Assessment Procedure (SAP) equations for dwellings and Simplified Building Energy Model (SBEM) for non-dwellings it is possible to estimate predicted unregulated energy.</p> <p>Unregulated energy can be calculated using the following:</p> <p><u>Unregulated energy for dwellings</u></p>
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			<p>Regulations addresses only regulated energy which can only be predicted accurately through the use of the National Calculation Method (NCM). Unregulated energy cannot be predicted accurately by any mechanism as it is entirely dependent on the occupier of a dwelling and their purchase and use of appliances, televisions and plug in devices such as computer equipment. There is no reference within Policy SWDP 27 nor the supporting text or evidence base to the inclusion of unregulated energy which <i>cannot be predicted accurately through any approved national software.</i></p>	<p>Sum of annual energy consumed by:</p> <ul style="list-style-type: none"> • Appliances, calculated using equation (L10) in SAP 2012 • Cooking, taken as the wattage using equation (L15) in SAP 2012, multiplied by 8.76 to convert to annual energy consumption <p><u>Unregulated energy for non-dwellings</u></p> <ul style="list-style-type: none"> • Annual energy consumed by equipment per square metre as calculated by SBEM, multiplied by floor area to give annual total for the building
3b	Colin Morrison	Turley, on behalf of Taylor Wimpey	<p>Based on our experience to date however we consider it critical to the future SPD to highlight the following points;</p> <ul style="list-style-type: none"> • The Interim Guidance Note (December 2016) issued in support of SWDP 27 clearly states that the use of the Enplanner tool is not compulsory and that the Energy Assessment submitted to demonstrate compliance with SWDP 27 can follow one of three approved methodologies including SAP/ SBEM and/ or <i>qualified consultants following a demonstrable methodology.</i> <p>For a detailed application or discharge of Reserved Matters application, Enplanner is not sufficiently accurate to monitor SWDP 27. As a suitable alternative, Taylor Wimpey would like to remind the council that every single</p>	<p><u>Noted. The Interim Guidance Note says that the Energy Assessment may be undertaken by one of 3 methods – a) using the Enplanner Low Carbon Planning Toolkit, b) the National Calculation Method (NCM) based on SAP/SBEM calculations including both regulated and unregulated energy, or c) professional assessment by qualified consultants following a methodology that is demonstrably equivalent to a) or b).</u></p> <p>The Guidance seeks not to be prescriptive but to ensure that energy assessments use a methodology demonstrably equivalent to NCM based on SAP/SBEM calculations including both regulated and unregulated energy.</p> <p><u>RE:Enplanner is not sufficiently accurate to evaluate applications</u></p> <p>The South Worcestershire Councils consider that Enplanner is a useful online tool which can assist most planning applicants and help planning officers assess</p>

			<p>new dwelling in South Worcestershire must demonstrate compliance with the Building Regulations through the submission of SAP calculations to the Building Control department which will be undertaken in accordance with the National Calculation Method (NCM).</p> <p>To speed up delivery of new housing in South Worcestershire and to reduce unnecessary administrative burden, suitable planning conditions could be implemented to require the delivery of these SAP calculations to demonstrate policy compliance prior to completion of the dwellings.</p>	<p>submitted energy statements.</p> <p>The South Worcestershire Councils make clear in the Guidance Note that applicants can prepare energy assessments using other methods, but the methodology must be demonstrably equivalent to the National Calculation Method (NCM), based on SAP / SBEM calculations including both regulated and unregulated energy.</p> <p><u>RE:New development must demonstrate compliance with Building Regulations through the submission of SAP calculations undertaken in accordance with the National Calculation Method (NCM)</u></p> <p>Noted. In addition, to comply with SWDP 27 an energy statement needs to be submitted using a methodology demonstrably equivalent to the NCM, based on SAP / SBEM calculations including both regulated and unregulated energy.</p> <p>It is not considered that such a condition would be enforceable if the SAP calculations are delivered at such a late stage. The “administrative burden” would be no different if the calculations needed to be assessed, whether at this stage or earlier.</p>
3c	Colin Morrison	Turley, on behalf of Taylor Wimpey	<p>Background information</p> <p>Commercial Viability – The cost impact of renewable energy technologies is variable depending on the type and quantum of technology used. It is generally recognised that traditional roof mounted solar PV cells is one of the most cost effective technologies to generate renewable</p>	<p>Noted. The policy SWDP 27 is consistent with current standards to be met, and having been subject to viability testing through the SWDP evidence base and at Examination should not adversely affect the delivery of the Plan or viability of individual developments.</p>

			<p>electricity however it is possible that this technology may not be suitable for certain projects such as those within a conservation area or where there could be sensitive landscape and visual issues. In this instance other renewable energy technologies such as Solar Thermal Hot Water cells and Ground Source Heat Pumps will be substantially more expensive and therefore affect overall project viability.</p> <p>New dwellings will have a low heat demand with space heating typically required in the colder months and a low hot water demand throughout the year.</p> <ul style="list-style-type: none"> • As a result of the low heating demand, only technologies that generate renewable electricity are typically suitable with alternative technologies such as wind turbines and Combined Heat and Power either not practical for individual dwellings and/ or incapable of generating sufficient renewable electricity. <p>Building Orientation – On residential applications, it is inevitable that not all dwellings can be orientated toward the south to ensure optimum efficiency for roof mounted technologies. In this instance it is important to apply a site wide energy reduction target as opposed to a building specific target to allow applicants flexibility in meeting the policy.</p> <ul style="list-style-type: none"> • Available Roofspace – If the council continues to request that SWDP 27 addresses both regulated and unregulated energy it is possible that some dwellings may not have sufficient south facing roofspace to accommodate the necessary quantum of PV. 	<p>SWDP 27 provides flexibility for applicants to determine which renewable or low carbon energy technology is most appropriate for their development.</p> <p>SWDP 27 provides flexibility in the event that an applicant can demonstrate that achievement of the 10% requirement is not technically feasible or would make their proposal unviable.</p> <p>SWDP 27 provides flexibility and makes clear that the use of on-site sources, off-site sources or a combination of both, can be considered in meeting the requirement.</p> <p>Noted. A whole site approach is considered appropriate, rather than each building having to comply.</p>
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3d	Colin Morrison	Turley, on behalf of Taylor Wimpey	<p>Suggested Main planning issues:</p> <ul style="list-style-type: none"> • Landscape and Visual or Heritage constraints associated with the provision of roof mounted technologies • The positive contribution to the planning balance resulting from the deployment of renewable and/ or low carbon technologies • The absolute need for housebuilders to identify the most suitable renewable technology based on their specification • The recognition that each housebuilder may have a different specification and approach and, as such, will utilise different technologies. <p>Agree that a strategic environmental assessment (SEA) of the SPD is not required</p>	<p>Agree. SPD will address planning issues related to renewable and low carbon energy technologies, including roof mounted technologies.</p> <p>Agree. SWDP 27 says that the wider benefits of renewable and low carbon energy projects will be material considerations when assessing planning applications. These benefits include a contribution to CO2 reduction, the diversification of local rural economies, the creation of new jobs and support for the regeneration of urban areas, including industrial and brownfield sites.</p> <p>Noted. SWDP 27 provides flexibility for housebuilders / applicants to determine which renewable or low carbon energy technology is most appropriate for their development.</p> <p>Noted.</p> <p>Noted</p>
<u>4a</u>	Emily Barker Strategic Planning & Environm	Worcestershire County Council	<p>Biodiversity is a key consideration in assessing the suitability of specific renewable energy technologies. Guidance is needed on siting developments appropriately to avoid potentially negative impacts (for example bird strike on wind turbines; migratory fish passage through wave or tidal energy schemes). Such developments need</p>	<p>Agree. The SPD will consider the different planning issues associated with different renewable and low carbon energy technologies I.</p>

	ental Policy Manager		to consider SWDP22 (Biodiversity and Geodiversity) to ensure that favourable conservation status is not affected for protected species or habitats and that there is no adverse effect on Sites of Special Scientific Interest (SSSI).	
<u>4b</u>	Emily Barker Strategic Planning & Environm ental Policy Manager	Worcestershire County Council	<p>Worth including list of potential renewable energy technologies they may wish to consider?</p> <ul style="list-style-type: none"> - Need to consider the energy requirements of an increasing number of electric vehicles - Heat networks – information on the heat networks report needs to be provided, including a summary of findings, how developers can access the report, benefits to considering heat networks, need to consider public / commercial buildings nearby. - Smart grid / smart energy advice should be incorporated <p>'Advice on information that will need to be provided if renewable or low carbon energy is deemed not practical or financially viable' – agree with this, need to provide the same advice for heat networks</p> <p>'Advice on how opportunities for decentralised energy and heating networks can be explored with respect to very large scale development proposals' – SWDP wording is actually large developments, not just very large scale</p>	<p>Agree. The SPD will consider the different planning issues associated with different renewable and low carbon energy technologies.</p> <p>Disagree. The policy does not address the provision of infrastructure / energy for electric vehicles. (NB SWDP 4 does touch on this, under criterion E & F)</p> <p>Noted. It is not clear what heat networks report is referred to or its links to SWDP 27B which requires large scale development proposals to examine the potential for a decentralised energy and heat network..</p> <p>Noted, however the SPD will provide planning guidance on the implementation of SWDP 27, whereas general energy advice is outside the scope of the SPD.</p> <p>Agree</p> <p>Noted</p>

			<p>Should consider enabling easy adoption of renewables for homes without them at a later date – appropriate orientation, grid capacity etc.</p> <p>- Affordable homes should be prioritised for renewables.</p> <p>Q3 What are the wider benefits of renewable and low carbon energy projects that should also be material considerations when assessing planning applications? For example, should wider benefits include the contribution to CO2 reduction, the diversification of rural economies and creation of new jobs?</p> <p>- As stated, yes these should be considered. Also energy security, facilitating the switch to EVs which assists with air quality.</p>	<p>Noted. This is beyond the scope of the current policy. The supporting text for SWDP 27 encourages the retrofitting of micro-generation technologies in existing developments, subject to consideration of potential impacts on local planning designations, the historic environment and the residential amenity of the local area. Some of this will be permitted development. We can add a note on what is currently permitted development</p> <p>Disagree. The policy does not distinguish between affordable and other tenures, so the LPA cannot prioritise this.</p> <p>Disagree. Consideration of Electric Vehicle requirements is beyond the specific scope of the policy.</p>
5a	Gillian Driver	Natural England	<p>European or international importance (Special Areas of Conservation, Special Protection Areas and Ramsar sites) and nationally important -Sites of Special Scientific Interest (SSSIs)</p> <p>If an internationally and/or nationally designated site could be affected, the SPD should set out</p>	<p>Agree. The SPD will provide guidelines for stand</p>

			<p>the requirements for appropriate assessment in the context of the protection and conservation of these sites.</p>	<p>renewable and low carbon energy proposals, including issues related to sites with statutory protection.</p> <p>Noted. Policy SWDP 22 Biodiversity and Geodiversity is referred to, but details of appropriate assessment are not required in the SPD</p>
5b	Gillian Driver	Natural England	<p>Landscape and visual landscapes</p> <p>If Malvern Hills Area of Outstanding Natural Beauty (AONB) or Cotswold AONB could be affected by the SPD, consideration should be given to direct and indirect effects upon the designated landscape and in particular the effect upon its purpose for designation, as well as the content of the relevant management plan.</p> <p>Within the context of the Renewable and Low Carbon Energy SPD, Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies pertaining to the area. The SPD should set out a requirement that applications should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography. The European Landscape Convention places a duty on Local Planning Authorities to consider the impacts of landscape when exercising their functions.</p> <p>The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation</p>	<p>Agree. The SPD will provide guidelines for stand renewable and low carbon energy proposals, including issues related to landscape and visual impact.</p> <p>Noted. This is a requirement of policy SWDP 23 and 25 for certain developments, and this will be cross referenced.</p> <p>Noted. This is addressed in other policies such as SWDP 5, 21, 25 and 38, and the emerging Design SPD. These can be cross referenced but a level of detail on these is not required in the SPD.</p> <p>The SPD will indicate what technologies, and under what circumstances, a Landscape and Visual Impact Assessment may be required.</p> <p>Noted. This is mainly covered in other policy areas.</p> <p>It is not clear how the integration of renewable and low carbon energy into new development or stand alone</p>

			<p>and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might make a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.</p> <p>Green Infrastructure These SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area.</p> <p>Strategic Environmental Assessment/Habitats Regulations Assessment An SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p>	<p>renewable and low carbon energy schemes could provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment..</p> <p>Noted. This is relevant to the some of the SPDs. This SPD will provide planning guidance on the implementation of SWDP 27. Making provision for Green Infrastructure is outside the scope of the SPD.</p> <p>Noted. This is not specific to the renewable and Low Carbon Energy SPD, but is relevant to the Design SPD.</p> <p>Noted. Natural England have been consulted separately on the requirement for SEA, and concluded that it is unlikely to be required for this SPD.</p>
<u>6</u>	Barbara Morgan	Network Rail	<p>WIND TURBINES</p> <p>Network Rail would wish to see such equipment sited so that the lateral distance from the railway boundary to foot of mast is greater than height of mast + length of propeller blade + 3m. Wind turbulence may be a factor to be considered and the applicant would need to ensure design/position of wind turbine does not present a potential problem for neighbours (railway included).</p>	<p>Noted. The SPD will consider the planning issues associated with wind turbines.</p> <p>However, in June 2015, the Secretary of State for Communities and Local Government set out considerations to be applied to proposed wind energy developments. It made clear that planning permission</p>

			<p>Should the turbines collapse for any reason then the developer should ensure that any fail safe distance will include the wind-turbines potential for topple in the direction of the railway boundary. Asset Protection Engineering involvement may only be needed when constructing or undertaking maintenance of the wind turbine and then only where such activities presented a potential risk to the operational railway.</p> <ul style="list-style-type: none"> • Where developers of turbines must consider shadow flicker. There may be a risk to driver's vision (how they perceive signalling, the route ahead, stopping in the case of emergency etc.) which may be impacted by a wind turbine. The applicant may be asked to provide documentation to show that the full extent of shadow flicker has been investigated. Network Rail utilises radio/signalling equipment and we would not want to see this interfered with, particularly as it is safety critical and absolutely integral to the operation of the railway. • There is some concern that vibration from turbines can affect ground conditions; with the possible issue here being embankments and potential instability (if a turbine was ever located close enough to the railway, in which case Network Rail would raise an objection and would wish consultation on a possible repositioning). The construction of the towers, heavy blades, gearbox and generator as well as guy lines to hold the tower in place put strain on the ground at the base of the structure. 	<p>should only be granted if the site has been identified as suitable for wind energy development in a Local Plan or Neighbourhood Plan and that the planning impacts identified by the affected local community have been fully addressed and the proposal has the local community's backing.</p> <p>The SWDP has not identified sites suitable for wind energy development. Therefore planning proposals for medium or large scale wind turbines will only be supported if the site has been identified as suitable for wind energy development in a Neighbourhood Plan and that the planning impacts identified by the affected local community have been fully addressed and the proposal has the local community's backing.</p>
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7a	Nick Freer	David Lock Associates on behalf of Hallam Land Management	<p>The NPPF sets out a clear basis (paragraph 95) for relating local policy to national policy, advocating that local authorities adopt nationally described standards.</p> <p>National standards are determined on the basis of rigorous technical and cost information and detailed consultation on such issues that are often complex and site specific.</p> <p>Whilst the LPA might look to innovative ways of achieving the Government's objectives in relation to climate change, any such requirement for a specific standard which is wider than national mandatory standards can only be expressed as aspiration which must be subject to negotiation in the light of the wider site/ development specific circumstances.</p> <p>Regarding the potential to include permitted development rights relating to renewable and low carbon technologies with within the SPD, we suggest that this is un-necessary. Permitted development rights are nationally applicable and therefore not specific to the South Worcestershire Authorities. It is not necessary to repeat guidance already set out., particularly when this guidance could be subject to amendments which would render the SPD inaccurate.</p>	<p>Noted .Policy SWDP has been examined and is in line with national planning policy and guidance.</p> <p>Noted. The SPD will set out the requirements for an independent financial viability appraisal in the event that applicants consider that meeting the policy requirement would make their proposal unviable.</p> <p>Noted. Policy SWDP has been examined and is in line with national planning policy and guidance.</p> <p>Disagree. Many applicants are unclear whether or not a planning application is required for the installation of a renewable or low carbon energy project. Clarification of permitted development rights will clarify the circumstances when planning permission is (or is not) required..</p>
7b	Nick Freer	David Lock Associates on behalf of Hallam Land Management	<p>The requirement for development proposals to have regard to sustainability and environmental considerations is understood, however the application of such measures is directly relevant to development costs and viability implications locally.</p> <p>It is critical that the SPD adopts a flexible and pragmatic approach to suit individual circumstances.</p>	<p>Noted. SWDP 27 has been examined and is in line with national planning policy and guidance. SWDP 27 provides flexibility for applicants to determine which renewable or low carbon energy technology is most appropriate for their development. SWDP 27 also provides flexibility in the event that it can be demonstrated by the applicant that achievement of the 10% requirement it is not technically feasible or would make their proposal unviable. The SPD will amplify this point.</p>

8	Steven Bloomfield	Worcestershire Wildlife Trust	<p>We would emphasise the need to make careful locational choices when considering renewable technologies. The biodiversity and landscape impacts of some renewables can be significant and avoiding harm should be high on the list of priorities when selecting suitable sites. This SPD should highlight this and draw from biodiversity guidance in the NPPF and SWDP22.</p> <p>This is largely covered above but for clarity it is worth repeating that there are potentially strong synergies between renewable energy generation and biodiversity enhancement. Sensitive locational choices and good design can help to maximise these and wider benefits accrued as a result should be a material consideration in assessing renewable applications. This has legal backing in the councils' duty to consider biodiversity (including biodiversity enhancement) under section 40 of the NERC Act 2006 and links closely to guidance on biodiversity enhancement in the NPPF (see for example paras. 9 and 109)</p> <p>We do not believe that SEA is required for this SPD.</p>	<p>Agree, The SPD will consider the different planning issues associated with different renewable and low carbon energy technologies. .NPPF and SWDP 22: Biodiversity and Geodiversity will be referenced.</p> <p>Noted. As above SWDP 22 is a relevant policy in the consideration of development that will affect biodiversity issues</p> <p>Noted.</p>
9	Kezia Taylerson	Historic England	<p>We do consider that the SPD would benefit from a section recognising the potential conflict between conserving the historic environment and implementing renewable and low carbon technologies and the need for a sympathetic and appropriate response.</p> <p>We support the inclusion of Policy SWDP6: Historic Environment in the list of relevant policies and consider that Policy SWDP24: Management of the Historic Environment is also included.</p>	<p>Agree. The SPD will consider the different planning issues associated with different renewable and low carbon energy technologies, including considerations relating to the historic environment.</p> <p>Noted. These policies can be cross referenced in the SPD.</p>
10.	Cllr Louis Stephen	Councillor, Battenhall Ward, Worcester City	<p>1) SPD should make reference to priority to introduce measures that reduce consumption rather than just using renewable energy.</p>	<p>Noted. Footnote 60 to the policy states that the policy should be considered in the context of an "energy hierarchy", where energy is reduced through energy efficiency and low energy design before meeting the</p>

		Council	<p>2) Suggested advice in the event that renewable energy is deemed to be uneconomic:</p> <p>a) To future proof the design and layout so that it would be possible to install renewable technologies later. e.g. a) to orientate roofs and design for future solar panels for when install prices potentially fall in the future. b) to install hot water cylinder that has a solar PV link or an additional solar thermal coil for a later installation of solar panels. c) to leave a space for solar panel invertors and space in the wiring for a future PV connection.</p> <p>b) In evaluating viability provide a guideline on how long the payback period should be - should it be 5 years, 10 years or 20 years? I'd go for 15 years.</p>	<p>residual energy demand, first from renewable and low carbon sources and then from fossil fuels. This will be emphasized. However, the SPD will provide planning guidance on the implementation of SWDP 27 – the generation of energy from renewable and low carbon sources. Reducing energy consumption relates to energy efficiency which is outside the specific scope of the policy and the SPD.</p> <p>Agree. The SPD will set out the requirements for an independent financial viability appraisal in the event that applicants consider that meeting the policy requirement would make their proposal unviable.</p> <p>Noted. The policy allows for viability considerations. Noted. The SPD will provide planning guidance on the implementation of SWDP 27. Designing new development to accommodate renewable and low carbon technologies in the future is outside the scope of the SPD. .Although laudable, the policy cannot insist that design is future-proofed to allow retrofitting of renewables at a later date. b) & c) Details of installing solar panels are also beyond the scope of the policy, as it is too detailed.</p> <p>Noted. Whilst this relates to viability as far as the consumer is concerned it is not applicable at the application stage, for the developer (unless he will also be the landlord / owner) and will depend on government tariffs / future installation costs that often change and are beyond the scope of planning policy.</p>
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