

**Sites and Policies DPD - Urban Areas and Policies (Draft Options) -
Renewable and Low Carbon Energy SPD (September 2011) Responses**

Support

RNEWSPD_01 - Renewable and Low Carbon Energy SPD

Total Responses Received: 2

RSPD1 - Approach to proposals for renewable and low carbon energy technologies within the District

Respondents 1 50%

Reference	Site	Document Name	Comment	Council Response	Cons.	
5062_5998 / 53621		RENEW SPD	Yorkshire Energy Partnership	The SPD is well laid out and has a lot of useful information. In many cases solar PV is permitted development, which the SPD tends to obscure. Guidance could be given in such cases to minimise visual impact.	NOTED Up-to-date information on Permitted Development Rights relating to micro-renewables, including solar PV, can be found in Appendix 1. CHANGES MADE TO SPD	<input type="checkbox"/>

RSPD2 - Sustainability Appraisal

Respondents 1 50%

Reference	Site	Document Name	Comment	Council Response	Cons.	
0289_6155 / 51646		RENEW SPD	English Heritage	Insofar as this SPD might impact upon our particular area of concern, English Heritage would concur with the conclusions in the report that an SEA would not be required for this document since the document is supplementary to existing Policy within the Adopted Core Strategy, that the parent Policy of the LDF was subject to a full SA/SEA, and that the SPD, on its own, is unlikely to have significant environmental effects.	NOTED	<input type="checkbox"/>

Object

RNEWSPD_01 - Renewable and Low Carbon Energy SPD

Total Responses Received: 6

RSPD1 - Approach to proposals for renewable and low carbon energy technologies within the District

Respondents 5 83%

Reference	Site	Document Name	Comment	Council Response	Cons.	
2042_7225 / 51436		RENEW SPD	Various Landowners - Carter Jonas	We request that further consideration is given to Chapter 7: Wind Turbines, which currently states that 'modern wind turbines commonly fit into two categories: large scale commercial wind turbines, and small scale 'micro-generation' turbines'. We do not believe this is the case. The wind turbine categories most widely adopted are: small scale (<50kW, usually with tower heights of no greater than 35m); medium scale (50kW-500kW, usually with tower heights of up to 50m); and large scale (>500kW, with tower heights of 50m+).	NOTED The purpose of this SPD is to set out the basic pros and cons of each technology individually and set out the issues related to it. It is intended to explain to the lay person which technology needs planning permission and which does not. Detailed information with regard to exact wind turbine specification and technology can be found elsewhere on the internet. NO ALTERATIONS CONSIDERED NECESSARY	<input type="checkbox"/>
2042_7225 / 51444		RENEW SPD	Various Landowners - Carter Jonas	In Table 1 on page 9, wind turbines are grouped into three categories: small scale wind (<25m); medium scale wind (25-75m) and large scale wind (75m+), with turbines of over 25m deemed as unacceptable in the AONB. We note that in certain parts of the AONB turbines taller than 25m may not be suitable. However, we consider the 'medium scale wind' bracket far too broad, which as a result deems a whole range of turbines that, in the right location could be appropriate in the AONB, as not suitable. Turbines in the lower end of the category are of a completely different scale to a 75m turbine and as such the potential landscape and visual impact of such turbines differ greatly	NOTED The table considers 'general' suitability of turbines in the AONB. The individual impact of each installation will be an important factor in the acceptability of a proposal. NO AMENDMENTS TO THE SPD ARE CONSIDERED NECESSARY	<input type="checkbox"/>
2309_7395 / 51290		RENEW SPD	NFU North East	Concerned with Table 1 General suitability of each technology in the AONB. The document sets out targets, we are concerned they are too prescriptive and need further clarification and consideration.	NOTED This document does not set targets but does explain national and local planning policies which may be of relevance when considering submitting a planning application for a renewable scheme. NO AMENDMENTS TO THE SPD CONSIDERED NECESSARY	<input type="checkbox"/>
2309_7395 / 51291		RENEW SPD	NFU North East	Planning policies should support sustainable growth in rural areas by taking a positive approach to new development. In many cases this will involve using modern renewable technologies. These should be welcomed and not refused merely on aesthetic grounds. The NFU fully supports the principles of renewable energy.	AGREED Each application will be assessed upon its own merits. Harrogate Borough Council is supportive of sustainable growth in appropriate locations. NO ALTERATIONS TO THE SPD CONSIDERED NECESSARY	<input type="checkbox"/>

5786_6956 / 52201

RENEW
SPD

Harrogate Ramblers Group

Domestic roof mounted PV or solar hot water collector
panels should be subject to planning applications

AGREED IN PART

The Government have issued permitted
development rights for certain
developments. Depending on the size
and positioning of roof mounted
technologies permission may be
required.ALTERATIONS HAVE BEEN MADE TO
REFLECT THIS**RSPD4 - Other**

Respondents 1 17%

Reference	Site	Document Name	Comment	Council Response	Cons.	
1215_7369 / 58653		RENEW SPD	Persimmon Homes Yorkshire Ltd	Overall, we consider that the majority of the SPD does not provide greater detail on policies in the Council's DPDs and is more akin to a guidance document to help applicants make a planning application. Furthermore, the SPD replicates a significant amount of national planning policy guidance, in particular the companion guide to PPS22.	NOTED. This guide in intended to set out the pros and cons of each technology and advise potential applicants making a planning application. NO ALTERATIONS CONSIDERED NECESSARY.	<input type="checkbox"/>

Comment

RNEWSPD_01 - Renewable and Low Carbon Energy SPD

Total Responses Received: 28

RSPD1 - Approach to proposals for renewable and low carbon energy technologies within the District

Respondents 20 71%

Reference	Site	Document Name	Comment	Council Response	Cons.	
0289_6155 / 51642		RENEW SPD	English Heritage	Within Section 6 mention should also be made of Historic Parks and Gardens (where inappropriately sited Renewable Energy schemes could result in substantial harm to elements which contribute to their significance - such as designed views), Registered Battlefields (where national policy guidance makes it clear that these are to be regarded as designated heritage assets of the highest significance) and archaeology (particularly Scheduled Monuments).	AGREED ALTERATIONS MADE TO THE SPD TO REFLECT THIS	<input type="checkbox"/>
0289_6155 / 51643		RENEW SPD	English Heritage	Paragraph 7.15, final sentence – reference ought also to be made to the World Heritage Site and to Registered Parks and Gardens. It is suggested that the final sentence is amended to read “the Nidderdale AONB, the area around the Fountains Abbey/Studley Royal World Heritage Site, and in the vicinity of Registered Historic Parks and Gardens”.	AGREED ALTERATIONS MADE TO THE SPD TO REFLECT THIS	<input type="checkbox"/>
0289_6155 / 58719		RENEW SPD	English Heritage	In order to assist users of this document it might be helpful to include links to useful websites. English Heritage have suggested a useful website see representation.	NOTED	<input type="checkbox"/>
1031_7124 / 51098		RENEW SPD	Ripon Civic Society	RCS congratulates HBC on the production of a comprehensive and informative guide to the range of renewable energy options and installation implications. However, owing to the topicality of the impacts of and financial support for wind turbines and wind farms, RCS is concerned about how effective the SPD can be regarding this element of renewable energy, especially given the concern this raises in some quarters.	NOTED This SPD is purely intended to inform the lay person as to what options are available. NO ALTERATIONS TO THE SPD CONSIDERED NECESSARY	<input type="checkbox"/>
1031_7124 / 51100		RENEW SPD	Ripon Civic Society	RCS is concerned that the visual impact of wind farms located outside the nationally designated areas, in particular Nidderdale AONB and the World Heritage Site and buffer zone, but visible from them is a significant risk to the area. National guidance appears to dwell on close-up visual impacts and to be somewhat acquiescent regarding longer distance views.	DISAGREE National guidance also places an emphasis on protecting the setting into and out of designated areas. NO ALTERATIONS TO SPD CONSIDERED NECESSARY	<input type="checkbox"/>

1031_7124 / 51101	RENEW SPD	Ripon Civic Society	The Harrogate Planning and Climate Change Study proposes an Energy Opportunity Plan for Ripon. RCS is concerned that the approach to wind energy potential does not make any attempt to consider the wider view structure of the District or its impact upon the city.	NOTED The SPD is concerned with the Harrogate District as a whole. Applicants would be encouraged to speak to a Planning Officer to discuss any potential opportunities within the District including Ripon. NO ALTERATIONS TO THE SPD CONSIDERED NECESSARY	<input type="checkbox"/>
1215_7369 / 58651	RENEW SPD	Persimmon Homes Yorkshire Ltd	From reading Chapter 1 of the SPD, our Client expected the document to relate specifically to renewable energy technologies in Harrogate District. However, the document repeats generic information on renewable technologies from national planning guidance with limited reference to Harrogate.	NOTED Chapter 1 sets out the purpose of the SPD. The SPD as a whole explains each technology individually and sets out their pros and cons. It is intended to explain to the lay person which technologies require planning permission. NO ALTERATIONS TO THE SPD CONSIDERED NECESSARY	<input type="checkbox"/>
2042_7225 / 51441	RENEW SPD	Various Landowners - Carter Jonas	We consider it inappropriate to group turbines of up to 500kW in the same category as large scale wind turbines of 500kW or above, as these turbines are of a completely different scale they are much smaller in size, typically only having towers of between 24m and 50m in height, and as such the potential environmental impact of such turbines is far less than that of a large scale turbine. In addition, medium scale wind turbines are very rarely chosen for 'commercial wind farms' comprising more than two turbines. In the majority of cases, by virtue of their scale, medium scale wind turbine schemes of one or two turbines do not require a full Environmental Impact Assessment and the power can be utilised on site rather than connecting back into the National Grid.	NOTED The purpose of this SPD is to set out the basic pros and cons of each technology individually and set out the issues related to it. It is intended to explain to the lay person which technology needs planning permission and which does not. Detailed information with regard to exact wind turbine specification and technology can be found elsewhere on the internet. NO ALTERATIONS CONSIDERED NECESSARY	<input type="checkbox"/>
2042_7225 / 51445	RENEW SPD	Various Landowners - Carter Jonas	I think it is important to note in the SPD that with regards to Green Belts paragraph 13 of PPS22 advises that elements of renewable energy projects will comprise of inappropriate development and will need to conform to guidance contained within PPG2: Green Belts.	NOTED Since this consultation was undertaken all PPS and PPG have been superceded by the NPPF. The Harrogate District Core Strategy Policy EQ2: The Natural and Built Environment, makes it clear that 'the District's exceptionally high quality natural and built environment will be given the level of protection appropriate to its international, national and local importance'. This is referred to in Paragraph 2.11 of the SPD. NO ALTERATIONS ARE CONSIDERED NECESSARY.	<input type="checkbox"/>

2042_7225 / 51446	RENEW SPD	Various Landowners - Carter Jonas	Whilst wind turbines are not listed as being appropriate development within the Green Belt in their own right, the view is that as a development associated with an existing dwelling and agricultural business there is a case to make that they are appropriate by association.	NOTED Each application will be considered on its own merits. NO ALTERATIONS CONSIDERED NECESSARY	<input type="checkbox"/>
2042_7225 / 51447	RENEW SPD	Various Landowners - Carter Jonas	Para 7.12 on Pg. 14 states that wind turbines are not often suitable in urban areas reference to 'urban areas' is perhaps misleading. There are numerous cases where wind turbines have been installed in urban areas such as business parks, and even community green space.	DISAGREE The use of the words 'not often' implies that in some cases wind turbines have been found to be appropriate in urban areas and therefore been given planning consent. Each application will be assessed on its own merits. NO ALTERATIONS CONSIDERED NECESSARY.	<input type="checkbox"/>
2042_7225 / 51448	RENEW SPD	Various Landowners - Carter Jonas	Para 7.17 on Pg. 15 recommends that a separation distance of at least 200m is incorporated between the turbine and any other dwelling. We would like clarification on this distance and the reasoning for 200m.		<input type="checkbox"/>
2042_7225 / 59189	RENEW SPD	Various Landowners - Carter Jonas	Wind turbines could also be argued to represent engineering works or other works that are not necessarily inappropriate provided they maintain openness and do not conflict with the purposes of including land in the Green Belt.	DISAGREE The Government's Planning Practice Guidance states that when located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. This is supported by paragraph 91 of the NPPF. NO AMENDMENTS ARE CONSIDERED NECESSARY.	<input type="checkbox"/>
2763_7262 / 51746	RENEW SPD	Environment Agency	Within the Anaerobic Digester section of this SPD we feel that the need for an Environmental Permit from the EA for such an activity should be made clear.	NOTED AMENDMENTS TO THE SPD HAVE BEEN MADE TO REFLECT THIS.	<input type="checkbox"/>
5786_6956 / 52198	RENEW SPD	Harrogate Ramblers Group	Historic evidence gives rise to the fact that such commitments are not always fulfilled. The forthcoming NPPF will presumably effect HBC's ability to keep a tight control of future renewable energy devices.	NOTED Whilst the NPPF is supportive of renewable energy technologies, applications will still need to be in conformity with local planning policies where appropriate. NO ALTERATIONS ARE CONSIDERED NECESSARY	<input type="checkbox"/>
5786_6956 / 52199	RENEW SPD	Harrogate Ramblers Group	We would generally not support small or large wind turbine developments as they rarely have minimal impact upon the countryside.	NOTED	<input type="checkbox"/>

5786_6956 / 52200	RENEW SPD	Harrogate Ramblers Group	References are made to the unsuitability of renewable energy plant in Green Belt and AONB, the same should also said for SLA's and areas of the countryside where views are significantly impaired.	NOTED Applications for renewable energy plants within SLA's or other areas of the countryside will all be assessed on their own merits and against a variety of planning documents including landscape character appraisals. NO ALTERATIONS ARE CONSIDERED NECESSARY.	<input type="checkbox"/>
5786_6956 / 52202	RENEW SPD	Harrogate Ramblers Group	CHP appears to be ruled out early as they are difficult to retrofit, and not usually economically viable for operations of less than 17 hours per day. However, they can be effective at reducing carbon emissions. Most suitable uses are factories and employment facilities, HBC should not preclude against CHP	DISAGREE The SPD states the pros and cons of all types of renewable technologies including CHP. NO ALTERATIONS ARE CONSIDERED NECESSARY.	<input type="checkbox"/>
6040_7339 / 52737	RENEW SPD	Ms L Fussell	Significant thought has gone into this policy and I support it in principle, however, I do believe that the overall impact (aesthetic, transport, noise, non environmental attributes, etc.) all need to be taken into account. The size of the money on offer should not be the over-riding factor. I support the wind farm at Knabs Ridge but do not support the incinerator plans, which seem to have 'lost sight' of the bigger picture. There are far better, more environmentally friendly, and beneficial options for our District than this type of proposal.	NOTED Each application will be assessed against the development plan and national guidance - this will ensure that all potential impacts are fully considered by the decision maker. NO ALTERATIONS ARE CONSIDERED NECESSARY.	<input type="checkbox"/>
6040_7339 / 52738	RENEW SPD	Ms L Fussell	It would be more beneficial for the Council to improve its own housing stock. I am aware that this has been happening for some time, but progress and visibility of this is limited. Again, domestic solar, small scale wind turbines and heat exchangers are viable options.	NOTED	<input type="checkbox"/>

RSPD4 - Other

Respondents 8 29%

Reference	Site	Document Name	Comment	Council Response	Cons.	
0289_6155 / 51645		RENEW SPD	English Heritage	Appendix 3 PPG16 was replaced by PPS5.	NOTED. This has been replaced by updated guidance NPPF. THE SPD HAS BEEN UPDATED TO REFLECT CHANGES TO POLICY	<input type="checkbox"/>
1031_7124 / 51099		RENEW SPD	Ripon Civic Society	RCS recognises that the Overarching National Policy Statement for Energy (EN-1) and the NPS for Renewable Energy Infrastructure (EN-3) give HBC little capability to question 'need' as a material consideration and these will influence heavily the approach of the forthcoming National Planning Policy Framework. The SPD needs a clear but brief introduction to the national policy context so as not to give the impression of more local discretion than in practice can be enjoyed.	NOTED The policy context has been updated to reflect the change in Policy since the original SPD was consulted upon. THE SPD HAS BEEN UPDATED TO REFLECT CURRENT PLANNING POLICY	<input type="checkbox"/>

1031_7124 / 51102	RENEW SPD	Ripon Civic Society	Para 7.17 admits to noise from wind turbines and recommends a separation distance from dwellings. RCS suggests that reference could be made also to the proximity to the public rights of way network.	NOTED. The 2011 Planning and Climate Change Study makes reference to this in an Advisory Statement on Wind Farms AROW20s08/1 (The British Horse Society) NO ALTERATIONS WERE CONSIDERED NECESSARY.	<input type="checkbox"/>
1031_7124 / 51103	RENEW SPD	Ripon Civic Society	The installation of solar/ PV panels on buildings can be incongruous if not thought out, especially when retro-fitted to existing buildings. Guidance could be provided on how to integrate panels within the design of new construction, in particular through examples of successful practice.	NOTED This is something that will need to be discussed with Development Management once a planning application has been submitted or as part of pre-application advice as recommended in Chapter 5. NO ALTERATIONS CONSIDERED NECESSARY.	<input type="checkbox"/>
1215_7369 / 58652	RENEW SPD	Persimmon Homes Yorkshire Ltd	From reading the contents of the SPD, our Client is concerned that there is a significant overlap between the SPD and the PPS22 Companion Guide. Our Client therefore has doubts as to whether the SPD is required, given that its contents are already covered by other national planning guidance.	NOTED PPS22 has now been superceded by the NPPF. This guide is purely aimed at helping potential applicants to understand the various options open to them and to help them make an application. THE SPD HAS BEEN UPDATED TO REFLECT CHANGES TO POLICY.	<input type="checkbox"/>
2763_7262 / 51745	RENEW SPD	Environment Agency	Within paragraph 9.7 it is stated that 'a licence is also usually required from the Environment Agency (EA).' This should read 'a licence will also be required from the Environment Agency (EA)', because every hydropower scheme needs permission from the EA.	NOTED. ALTERATIONS HAVE BEEN MADE TO THE SPD TO REFLECT THIS	<input type="checkbox"/>
4715_5566 / 59214	RENEW SPD	Mr A Penderel Bright	Opportunities for harnessing water power along the River Nidd should be investigated.	NOTED This is for developers to approach the Council with regards to. NO ALTERATIONS CONSIDERED NECESSARY	<input type="checkbox"/>
5965_7201 / 52234	RENEW SPD	Harrogate District Friends of the Earth	Concerns that there is no mention of targets for the amount of energy that is supplied through renewable technologies. The Council needs to encourage developers to build high energy efficient properties with the use of renewable energy and use of CHPs.	NOTED This document is purely aimed at helping potential applicants submit a planning application by setting out the pros and cons of each technology. Any potential renewables targets would be discussed through the new Local Plan. NO ALTERATIONS CONSIDERED NECESSARY	<input type="checkbox"/>

