

**LOCAL PLAN REVIEW DEVELOPMENT STRATEGY OPTIONS AND POLICY OPTIONS -
JANUARY TO MARCH 2022**

SUMMARY OF RESPONSES TO Q19

Question 19 – Do you agree with the proposed renewable energy policy? If not, why not?

A summary of the comments received are set out below:

Comment	NWL Officer Response
Requirement for renewable energy infrastructure is welcome, suggest minor alteration to the wording to part (2) c) of the policy to say, ' <i>mitigate impacts on, or provide enhancements for, biodiversity</i> '.	Suggest amendment to current wording of part (2) c) of the policy. <i>"All impacts Mitigate impacts on, or provide enhancements for, biodiversity have been adequately mitigated or enhanced"</i> .
Preference for brownfield sites to be utilised for renewables and avoid the use/loss of best and most versatile land.	These comments are noted. Part (4) of the proposed policy details that the preference is for solar installations to be on brownfield land, away from the best and most versatile agricultural land.
The Local Plan should prevent wind and solar energy generation equipment in the most valuable locations in terms of landscape and agricultural land quality unless mitigation is possible.	These comments are noted. Part (4) of the proposed policy details that the preference is for solar installations to be on brownfield land, away from the best and most versatile agricultural land. Part (2) b) of the proposed policy seeks to ensure that there is no adverse impact on landscape character taking into account the special qualities of individual National Character Areas. In addition, it is expected that proposals for renewable energy installations would be accompanied by a detailed assessment of landscape character.
Policy and Option 2 are supported with caveats. NWLDC should consider the impact that solar and wind energy generation can have on landscape character and their potential cumulative adverse impact in particular locations. Stronger design requirements are suggested subject to constraints set out in 2(a) to 2(e), for solar and wind infrastructure to be integrated into the surrounding landscape with minimal impacts where projects are allowed to go ahead.	These comments are noted. Renewable energy proposals would be assessed against design policies in the new Local Plan and the Good Design Supplementary Planning Document. Part (2) b) of the proposed policy seeks to ensure that there is no adverse impact on landscape character taking into account the special qualities of individual National Character Areas. It is expected that proposals for renewable energy installations would be accompanied by a detailed assessment of landscape character.
Need to ensure the impact of wildlife is minimised.	These comments are noted. Part (2) c) of the proposed policy requires that all impacts on biodiversity should be adequately mitigated or enhanced.

<p>Preference for solar panels to be sited on roofs to mitigate their negative environmental impact. Support for warehouse developments to incorporate renewable technologies, but also for solar generation to be maximised on both new and existing properties.</p>	<p>These comments are noted. Part (4) of the proposed policy states that there is a preference for solar installations to be on previously developed land, this could include on existing buildings.</p>
<p>Option 3 is preferable; an ambitious target should be set to overachieve on the delivery of renewable energy.</p>	<p>Whilst it would be possible to include a more ambitious target it is also necessary to be realistic. Option 2 is the preferred approach as the targets have been identified as achievable by independent consultants through the Renewable and Low Carbon Energy Study 2021 (The AECOM Study).</p>
<p>The plan should provide a consistent approach to renewably sourced electric vehicle charging, ensuring that new builds are EV ready, and that car parks and commercial premises have substantially more than a perfunctory level of vehicle charging spaces.</p>	<p>The provision of EV charge points is now required through Building Regulations and therefore there is no requirement to repeat this legislation in planning policy.</p>
<p>NWLDC should consider the importance the impact of solar and wind can have on landscape character (proposed policy 2(b) and their potential cumulative adverse impact in particular locations (proposed policy 2(e)). The policy should also refer to avoidance of harm to habitats or species, not just mitigation and enhancement.</p>	<p>The potential impact of wind and solar installations on landscape is addressed in part (2) b) of the proposed policy and the potential cumulative impact is addressed in part (2) e) of the proposed policy. Part (2) c) of the policy (subject to proposed changes to wording above) requires mitigation for any impacts on biodiversity. Biodiversity includes all the different kinds of life you will find in an area and therefore separate reference to habitats and species is not required.</p>
<p>Policy is supported but suggests initially higher renewable energy targets to encourage renewable energy generation to be created sooner. Suggested amendments to proposed policy: Part 2c) needs to be rewritten to ensure that a broad range of landscape and biodiversity enhancements are secured, not just linked with any impacts. Part 2) should include that where public rights of way pass through or near to the site, planning applications will need to ensure mitigation and enhancement of public rights of way. The preference at part 4) for solar farms to be on previously developed land is overly restrictive, particularly given the information provided within paragraph 9.12.</p>	<p>Whilst it would be possible to include a more ambitious target, option 2 is the preferred approach as the targets have been identified as achievable by independent consultants through the Renewable and Low Carbon Energy Study 2021 (The AECOM Study).</p> <p>Suggest amendment to current wording of part (2) c) of the policy. <i><u>"All impacts Mitigate impacts on, or provide enhancements for, biodiversity have been adequately mitigated or enhanced"</u></i>.</p> <p>Suggested that a reference regarding Public Rights of Way is added to Policy IF4 of the Local Plan.</p>

	<p>Part (4) of the proposed policy looks to locate such installations on previously developed land in the first instance and such installations will only be permitted on the best and most versatile agricultural land if they can be exceptionally justified.</p>
<p>The targets set out in the roadmap should be reached before 2050. Targets for renewable energy should not be pro rata across the plan period as this will not respond quickly enough to the climate change emergency. A number of responses suggest alternative dates by which the renewable targets should be met by, including, by 2039, by 2040 and by 2045 (which would align with Leicestershire County Council's ambition).</p>	<p>The target in the Zero Carbon Roadmap for the district to be zero carbon by 2050 has been adopted by the Council. It may be possible for this target to be met earlier and whilst it would be possible to include a more ambitious target it is also necessary to be realistic. Option 2 is the preferred approach as the targets have been identified as achievable by independent consultants through the Renewable and Low Carbon Energy Study 2021 (The AECOM Study).</p>
<p>There should not be explicit targets to produce renewable energy via any specific technology. Any future policy should allow developers flexibility to utilise the energy infrastructure which is most appropriate to the site and its operations. A single target (rather than two separate targets for wind and solar) would enable greater flexibility between different forms of renewable energy generation.</p>	<p>The proposed policy does not dictate the type of renewable energy generation required on specific sites. Part 1) of the proposed policy supports renewable energy developments that are appropriate to their setting which allows flexibility for the most appropriate means of renewable energy generation on a site-by-site basis.</p> <p>Having a target for both wind and solar will enable more accurate monitoring.</p>
<p>In order to achieve the council's commitment to net zero it will require much more than renewable technologies.</p>	<p>These comments are noted.</p>
<p>The requirement for all new developments to incorporate proposals for on-site renewable technologies so as to maximise renewable energy production is not suitable; particularly for small and medium-sized developments. As such, it is suggested that requirement 5 of the policy instead <i>"encourages applicants to consider opportunities for on-site electricity and heat production from solar, wind and other renewable technologies so as to maximise renewable energy production."</i></p>	<p>The proposed policy does not dictate the type of renewable energy generation required on specific sites. Part 1) of the proposed policy supports renewable energy developments that are appropriate to their setting which allows flexibility for the most appropriate means of renewable energy generation on a site-by-site basis.</p> <p>Suggested addition to Part 1 of the Renewable Energy Policy: "1) The council will support renewable energy developments that are <u>proportionate to the development</u>, appropriate to their setting and make a positive contribution towards increasing the levels of renewable and low carbon energy generation in the district".</p> <p>It is recommended that part 5 of the policy be deleted.</p>

<p>Flexibility should be built into Criteria 5 of the proposed policy. Requirements should take account of site-specific issues. For example, it is unlikely that wind production will be feasible on smaller sites. Part 5) would benefit from some clarification. As written, it could be interpreted as requiring on-site energy generation from each of solar, wind and other technologies, when in fact the most appropriate approach should be determined on a case-by-case basis. It is suggested that this part of the policy is amended to read, “...<i>electricity and heat production from renewable technologies so as to...</i>”</p>	<p>The proposed policy does not dictate the type of renewable energy generation required on specific sites. Part 1) of the proposed policy supports renewable energy developments that are appropriate to their setting which allows flexibility for the most appropriate means of renewable energy generation on a site-by-site basis.</p> <p>Suggested addition to Part 1 of the Renewable Energy Policy: “1) The council will support renewable energy developments that are <u>proportionate to the development</u>, appropriate to their setting and make a positive contribution towards increasing the levels of renewable and low carbon energy generation in the district”.</p> <p>It is recommended that part 5 of the policy be deleted.</p>
<p>Requiring all new developments to incorporate on-site electricity and heat production from solar wind and other technologies is not the most appropriate strategy as this would require both electricity and heat production which is challenging on some sites given the patchy level of supply and it does not set out a standard based on an objective of seeking net zero carbon whereas it is rather one-sided focusing on a desire to maximise renewable energy production.</p>	<p>The proposed policy does not dictate the type of renewable energy generation required on specific sites. Part 1) of the proposed policy supports renewable energy developments that are appropriate to their setting which allows flexibility for the most appropriate means of renewable energy generation on a site-by-site basis.</p> <p>Suggested addition to Part 1 of the Renewable Energy Policy: “1) The council will support renewable energy developments that are <u>proportionate to the development</u>, appropriate to their setting and make a positive contribution towards increasing the levels of renewable and low carbon energy generation in the district”.</p> <p>It is recommended that part 5 of the policy be deleted.</p>
<p>Further information regarding the parameters for the requirements and the preparation of a Supplementary Planning Document as suggested would assist applicants in preparing developments and understanding the Council’s requirements in advance of submitting applications.</p>	<p>These comments are noted.</p> <p>The Levelling Up and Regeneration Bill: reforms to national planning policy consultation document states that authorities will no longer be able to prepare supplementary planning documents. It is therefore suggested that the reference to Supplementary Planning Document be deleted.</p>

Any requirements should also be included in viability testing.	The requirements will be tested as part of the whole Local Plan Viability Assessment.
The policy criterion includes reference to heritage assets and setting and this is welcomed.	These comments are noted.
Policy is supported but it could go further. The consultation has identified the need to build many thousands of new homes, office buildings and warehousing. It is unbelievable that existing 'new builds' are not already furnished with solar roof panels. The surface area of the roofs on the amount of new development proposed would provide a great deal of energy.	These comments are noted.
Welcome plans to increase renewable energy. New homes should have solar panels, heat pumps and great insulation. A reduction in energy demand must be the first step. The plan commits to more use of resource, especially cement for building, which is carbon emission heavy and growth in both car ownership and use. Need a change in mind set.	These comments are noted.
Agree with the proposed renewable energy approach. Renewable energy will continue to play a significant role in addressing the climate emergency. However, there are obvious economies of scale associated with delivering sustainable renewable energy options and delivering larger scale new development presents an opportunity to consider various renewable energy options. A New Settlement would have sustainability at its core and presents the opportunity for new innovative designs to be utilised on the scheme through a fabric first approach to design.	These comments are noted.
May be prudent to cover accessibility to a site for construction (including for 'abnormal loads' as necessary) and future maintenance purposes in the proposed criteria under item 2, especially in respect of sites for wind turbines.	It is agreed that reference to maintenance in Part 2) f) of the Renewable Energy Policy would be helpful: "f) Proposals are accompanied by details to demonstrate how <u>future maintenance will be undertaken and how</u> the site will be decommissioned to ensure the restoration of the site following cessation; and"
From a public health perspective, there is concern around fuel poverty.	These comments are noted.
Supports opportunities to exceed these targets rather than stopping if the targets were met. More could be done to look into low-carbon heat forms too.	These comments are noted. The targets included in the proposed policy have been identified as achievable by independent consultants through the Renewable and Low Carbon Energy Study

	<p>2021 (The AECOM Study). The targets are not ceiling figures.</p> <p>The AECOM study identifies that one of the main opportunities for renewable energy in NWLDC going forward will be heat pumps. The proposed policy wording (part 1) looks to support renewable energy developments that are appropriate to their setting and make a positive contribution towards increasing the levels of renewable and low carbon energy generation in the district. This includes heat pumps and other low carbon heat forms.</p>
<p>In respect of the overall topic of renewables and low carbon, approaches are supported that a) consider environmental risks b) minimise impacts and risks to people and the environment and c) are fit for the future. Sustainable renewable policies are supported, as long as they do not unacceptably impact the environment. Any policy should consider the environmental requirements ensure that appropriate measures are in place to protect the local environment.</p>	<p>These comments are noted.</p>
<p>In respect of wind and solar energy, an alteration to wording taken from the Zero Carbon Roadmap is suggested: Paragraph 9.13 The second bullet-point currently reads: “Solar - Set a formal target for solar capacity in NWL from 89MW today to at least 140MW by 2050 in the Local Plan.” However, the Zero Carbon Roadmap shows that 89MW is the capacity of currently installed and planning approved systems. Therefore, consideration should be given to amending the above wording to the following: “Solar – Set a formal target for solar generation in NWL from the current capacity of 89MW to at least 140MW by 2050 in the Local Plan...”. The same consideration should be given to amending the wording for wind generation.</p>	<p>The wording quoted is taken from the supporting text and not the policy itself.</p> <p>As the Local Plan period only goes up to 2040, we cannot set a target to 2050. The suggested changes can be incorporated into revisions to the supporting text.</p>
<p>The policy states that there should be a solar target of 37.11MW by 2039. It is unclear whether this is an increase of 37.11MW from the current capacity of 89MW or an actual capacity target. In order to provide clarity, suggest stating the following within the policy wording, for both wind and for the solar:</p>	<p>These comments are noted.</p> <p>The plan period is now to 2040 and the pro-rated renewable energy targets will need amending to reflect this.</p>

<ul style="list-style-type: none"> • Current generating capacity, • The 2050 capacity target, • The prorated 2039 target • The required increase in generating capacity from current. 	<p>It is recommended that a further explanation regarding the figures is included in the supporting text of the policy.</p>
<p>The need to address climate change is being addressed on a co-ordinated and industry wide basis through Building Regulation changes, agreed targets and joint multi-agency working relationships. Local Planning Authority targets that go beyond the national objectives threaten to undermine these collective efforts and result in ad-hoc site-by-site installations to meet Local Authority requirements. The NPPG identifies that Local Planning Authorities should only seek to go beyond nationally agreed objectives where there is clear and specific local evidence of a need to do so. No such evidence of a compelling local need in NW Leicestershire exists.</p>	<p>The inclusion of a target for renewable energy generation within the district does not go beyond the requirements of the Building Regulations.</p>
<p>It is recognised that real estate is a significant contributor to carbon emissions through the construction and operation of buildings. In setting planning policy on sustainable design, given the rapidly changing technologies and approaches, it is important to avoid policy wording that is too inflexible or could conflict with Government legislation and building regulations.</p>	<p>These comments are noted.</p>
<p>The net zero ambition is a disaster politically fostered out of ignorance and greed. It is the primary cause of the threatening toxic inflation as sound and proven resources and storage of energy are being discarded at the whims of politicians and public servants. The EU has had the sense to designate natural gas as a green energy source whereas we have abandoned the potential resources in the surrounding ocean and fracking opportunities on land. Together these actions have raised our energy prices beyond anywhere else in Europe. In addition, we are being expected to scrap our oil burning and gas heating and cooking stoves within 5 years.</p>	<p>These comments are noted.</p>
<p>A more overarching benefit could be to provide full noise and energy saving insulation for council owned properties.</p>	<p>These comments are noted.</p>
<p>Renewable energy must be used but at a cost people can afford.</p>	<p>These comments are noted.</p>

<p>This headlong rush into green issues has been generated by an 'us too' follow my leader attitude that supports industries and experts whose job depends on compliance. Something of benefit would be to volunteer to test Rolls Royce and JCB's technologies.</p>	<p>These comments are noted.</p>
<p>More information required; it is very light in detail.</p>	<p>These comments are noted.</p>
<p>The policy should be at least the national requirement. Why not mandate that all developments (new build, change of use, conversion etc) must install solar panels as the cost is no longer prohibitive. This would be an easy way to meet targets and could even help to achieve a target higher than the national average.</p>	<p>These comments are noted.</p>