

Planning Policy Team
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BY EMAIL

Our Ref: 21173/A3/NTH/SO
28 April 2014

Dear Sir/Madam,

SHROPSHIRE COUNCIL, SITE ALLOCATIONS AND MANAGEMENT OF DEVELOPMENT (SAMDEV) PLAN, PRE-SUBMISSION DRAFT (FINAL PLAN), MARCH 2014

Thank you for the opportunity to respond to the Shropshire Site Allocations and Management of Development Plan (SAMDEV).

The aim of these representations is to assist the Council in formulating an appropriate framework, which will promote the generation of energy from renewable and low carbon energy.

RES is one of the world's leading renewable energy project developers with operations across Europe, North America and Asia-Pacific. The company has been an established presence at the forefront of the wind energy industry since the 1970s, with a wind portfolio which has grown to more than 6GW worldwide. As a result of their long-term involvement in the renewable energy sector, RES has gained a high level of expertise in the development, design, construction, financing and operation of small to large scale wind farm projects, as well as, biomass, solar PV, anaerobic digestion, offshore wind and marine energy.

With every project, RES is committed to building a more sustainable future. Therefore it is integral that each of their schemes is designed and built to generate energy in the most economic way with minimal environmental impact. A positive planning policy framework is essential to the delivery of renewable energy schemes and as such RES is generally supportive of the Council's approach towards renewable energy.

RES is fully engaged in the development plan process and we wish to participate in creating a positive framework which will promote the generation of energy from renewable and low carbon energy.

The Coalition Government has stated its commitment to increasing the deployment of renewable energy across the United Kingdom and this is set out in the UK Renewable Energy Roadmap 2011 (and subsequent updates). There is also a longer term objective to achieve an 80% reduction in greenhouse gas emissions by 2050. The planning system has a significant part to play in achieving

these objectives, although obviously this relies on the development industry bringing forward good sites, selected on the basis of robust policy guidance.

The National Planning Policy Framework (NPPF) states that Local Planning Authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources. The framework indicates that Local Authorities should have a positive strategy to promote energy from renewable and low carbon sources and design their policies to maximise renewable and low carbon energy development, while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts.

RES supports the principle of a clear criteria based approach that aligns itself with the strategic energy targets and the enabling national policies.

With regard to the 'The Site Allocations and Management of Development Plan', our specific comments are as follows:

We agree that the Plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, and is consistent with national policy. As such the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

RES is generally supportive of the approach set out under Policy MD 8 on Infrastructure Provision, which is considered genuinely positive and encouraging of new proposals for renewable energy. Part 3 of the policy states:

"Applications for new strategic energy infrastructure will be supported in order to help deliver national priorities and locally identified requirements, where its contribution to a greener objectives outweighs the potential for adverse impacts."

In accordance with the NPPF, the criteria set out under Part 3 of Policy MD 8 is effectively worded to ensure that the impacts associated with renewable energy schemes are satisfactorily addressed whilst avoiding the imposition of arbitrary thresholds or separation distances which are unjustified and contrary to national planning guidance.

As a leading renewables developer, RES is supportive of criteria-based policies which seek to ensure that the impacts associated with renewable energy schemes are satisfactorily addressed.

Also under Part 3 of Policy MD 8 it is stated that:

"Development proposals should clearly describe the extent and outcomes of community engagement and any community benefit package."

RES has a long history of delivering excellent pre and post community consultation as well as providing community benefit to the tune of £5k/ MW. As part of our community benefit package RES establishes a community benefit fund and in addition has a unique scheme where local residents receive a direct tangible benefit through money off their electricity bills. Further information is available at www.res-leds.com

Part 4.i of Policy MD8 specifically relates to wind energy proposals and identifies issues for potential adverse impacts from wind energy projects. The focus of this part of the policy is on the potential for adverse impacts of wind energy proposals and not on the potential benefits that wind energy developments can bring. It is therefore considered that this part of the policy should be revised and worded more positively to provide greater support and guidance for renewable energy developments.

We look forward to being involved with this policy document as it progresses and further guidance on renewable energy development as part of a supplementary planning document.

Please acknowledge safe receipt of this representation.

Yours faithfully,

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NICHOLA TRAVERSE-HEALY
Associate