

## **Stretton Climate Care Part B continued**

### **Comments on DP12 continued**

“7.5 Wind Energy: National policy requires Local Authorities to clearly allocate areas suitable for wind energy development in Local Plans. Planning permission for wind energy proposals should only be granted if the application is in such an area. The Council will identify the criteria for the selection of areas suitable for wind energy development in Shropshire and carry out a Countywide assessment to inform the later stages of the Local Plan Review.”

Paragraph 151 of the NPPF 2019 states:

“151. To help increase the use and supply of renewable and low carbon energy and heat, plans should:

a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);

b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and

c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers”

Planning Practice Guidance states:

“In the case of [wind turbines](#), a planning application should not be approved unless the proposed development site is an area identified as suitable for wind energy development in a Local or Neighbourhood Plan.

#### **How are ‘suitable areas’ defined in relation to wind energy development?**

[Suitable areas](#) for wind energy development will need to have been allocated clearly in a Local or Neighbourhood Plan. Maps showing the wind resource as favourable to wind turbines or similar will not be sufficient.

Paragraph: 032 Reference ID: 5-032-150618”

It also states:

‘In addition to supporting the delivery of appropriately sited green energy, effective spatial planning is an important part of a successful response to climate change as it can influence the emission of greenhouse gases. ... Addressing climate change is one of the core land use planning principles which the National Planning Policy Framework expects to underpin both planmaking and decision-taking. To be found sound, Local Plans will need to reflect this principle ...’

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## Stretton Climate Care Part B continued

### Comments on DP12 continued

In responding to our earlier complaint about the apparent lack of consideration given to our representations on encouragement for the development of renewable energy, particularly wind power as well as solar power, the Council responded:

“In paragraph 7.4 of the Preferred Option, it is recognised that Shropshire must explore the potential for wind energy development to contribute to renewable energy provision alongside solar power and local energy generation in the County. The Preferred Option in paragraph 7.5 also supports the development of a circular economy through the active recovery of material resources and the production of energy from waste to contribute to achieving a low carbon economy and society.”

It was our understanding from discussion with officers that landscape and wind power studies would take place to define an area where windfarms could be suitable for development.

Shropshire Council subsequently commissioned no studies of the wind energy potential to fulfil this statement and have not provided any explanation for this U turn and abandonment of the potential development of wind power other than that it is for Neighbourhood and Community Led Plans to determine. This clearly is practically unworkable and is clearly a negation of the Council's responsibility to ensure that net zero emissions are achieved in Shropshire.

In March 2019 the Council's Place Overview Committee considered a Report on the Corporate Climate Change Strategy. The Strategy included a Table showing the potential Renewable Energy in the Marches Area. (Brisely et al., 2011). Shropshire has a potential renewable capacity over 10GW which equates to 20% of the West Midlands total electricity demand (DECC, 2010). Of this potential renewable energy over 9GW was from wind power. This shows that this resource is of regional importance as well as Countywide importance.

On 19th December 2019, Shropshire Council approved a Climate Change Strategy Framework which identifies the risks posed by the current climate crisis to Shropshire and establishes an overall goal of making Shropshire Council net greenhouse gas neutral by 2030. The document also identifies a set of clear objectives and principles to guide future corporate actions and a number of key themes where both direct and indirect interventions to reduce Shropshire's carbon footprint and improve its resilience to the climate crisis will have the greatest effect, including as stated in Paragraph 3.30: *continue*

## Stretton Climate Care Part B continued

### Comments on DP12 continued

a. **Demand management:** ‘Hard’ measures (physical or technology changes) to reduce the consumption of energy and water and waste production and ‘Soft’ measures such as staff training and optimising control systems;

b. **Transport and travel:** Measures which reduce the need or impact of travel such as the planned distribution of future growth and staff flexible and agile working policies. Support for active travel and invest in infrastructure which enables the rapid take up of electric and ultra-low emission vehicles;

c. **Renewable energy generation and storage:** The development of solar arrays, wind turbines, hydro-electric power, battery or heat storage solutions and heat networks to help meet business and community energy needs;

d. **Sustainable land management:** Supporting the delivery of multiple benefits including carbon capture and storage, reduced flood and drought risk, wildlife gains, positive impacts on human health and wellbeing and adaptation measures to mitigate risks from extreme climate events;

e. **Clean and inclusive growth:** Support skills investment and business growth which accelerates Shropshire’s transition to a low carbon economy and investment in low carbon infrastructure; and

f. **Adaptation and resilience:** Further changes to the climate are now inevitable, and the frequency of extreme weather is likely to increase. Both physical infrastructure and skills training will require investment to allow our services, businesses and communities to adapt and become more resilient in the face these changes.

It can be seen in Paragraph (c) above that the Council envisaged the development of wind energy for both business and community needs less than 12 months ago. Now the draft Local Plan would effectively prevent this taking place.

The Council has already had a Development Management case in the north of the county where an application for a single wind turbine had been submitted for approval. The Officers felt duty bound under the terms of the Planning Practice Guidance to recommend a refusal of permission despite the application being supported by the local community and the Parish Council. In this particular case, the Committee decided to grant permission ignoring national guidance but this illustrates the problem and this will persist as the Plan is currently drawn up.

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## **Stretton Climate Care Part B continued**

### **Comments on DP12 continued**

Section 19(1A) of the Planning and Compulsory Purchase Act 2004 provides that: 'Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.'

Our submission is that the draft local Plan appears to not be compliant with this requirement given the effective ban on the use of wind power throughout Shropshire and our concerns set out under Policy SP3 and is therefore likely to be in breach of this legislation. There has been a joint statement made by the Royal Town Planning Institute, the Town and Country Planning Association and Client Earth on this issue which makes this clear.

<https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=4927d472-a9f0-4281-a6af-463ddc642201>

The whole approach indicates that the Council is not serious in its intention for Shropshire to achieve net zero greenhouse gas emissions. We strongly object to this omission which is also in breach of national policy/guidance and which we consider may well make the Plan unsound as currently put forward.

**DP12, Paragraph 4.114** contains another incorrect reference to the Climate Act and the need for 80% reduction in greenhouse gas emissions although the Act was amended in June 2019 to require net zero emissions by 2050.

**DP12, Paragraph 4.121** refers to District Heating schemes. It should be possible for these to obtain much of their heat from renewable resources in most cases using heat pumps sourcing heat from air, water or ground, waste, biomass and solar with batteries.