

Purpose.

This submission relates to ID40 (MOG) Stage 2, Matter 31 DP26 (1):

*“Is the policy justified, effective and consistent with national planning policy, including the Government’s Policy Statement on onshore wind, dated July 8 2024?”*

- A) Para. 1 of the 8<sup>th</sup> July statement makes it clear that wind renewable energy development applications should be considered on an equal footing with other forms of renewable development with immediate effect.
- B) The latest version of the Local Plan under examination (GC4m), at MM059 does not reflect consistency with this policy and thus is unsound. (It also renumbers DP26 to DP27)
- C) We submit that that MM059 clearly needs to be revised. We attached our proposed revisions in both ‘GC4m/MM’ format and as Word markup to the Local Plan document.

## ~~DP26-~~**DP27.** Strategic, Renewable and Low Carbon Infrastructure

The delivery of sustainable communities in Shropshire relies on the provision of new strategic infrastructure and the continued operation of existing strategic infrastructure. Proposals which are likely to affect an internationally designated wildlife site will require a project level HRA in accordance with Policy ~~DP13-~~**DP12**.

### Existing Strategic Infrastructure

1. Development will be expected to demonstrate that it will not adversely affect, either directly or indirectly, the continued operation and potential expansion of existing strategic infrastructure.

### New Strategic Infrastructure

#### ~~Non-wind-r~~**Renewable and low carbon development**

2. ~~Non-wind-r~~**Renewable and low carbon development** will be supported where its impact is, or can be made, acceptable. To aid in this determination, all applications should be accompanied by an assessment of the proposal's effect on the following during both the construction and operational stages:
  - a. Visual amenity (including the considerations within Policy ~~DP18-~~**DP17**);
  - b. Landscape character (including the considerations within Policy ~~DP18-~~**DP17**);
  - c. Natural assets (including the considerations within Policy ~~DP13-~~**DP12**);
  - d. Historic assets (including the considerations within Policy ~~DP24-~~**DP23**);
  - e. Air quality, noise and public amenity (including the considerations within Policy ~~DP19-~~**DP18**);
  - f. Water quality and water resources noise (including the considerations within Policy ~~DP20-~~**DP19**);
  - g. Traffic generation and the nature of vehicle movements;
  - h. The Shropshire Hills AONB (including the considerations within Policy ~~DP25-~~**DP24**);
  - i. Hydropower applications should pay attention to fish stocks and normally be accompanied by a Flood Risk Assessment (see also

#### Policy ~~DP22-~~**DP24**) **a Water Framework Directive Assessment, and geomorphological assessment;**

- j. Biomass, energy from waste, biogas and anaerobic digestion proposals should also address the impact on vibration, odour, **bioaerosols** and dust (the latter for biomass and energy from waste only). Opportunities to recover heat and power are encouraged in accordance with Policy SP3; and
  - k. ~~Large-scale ground-mounted solar photovoltaic solar farm-p~~**Proposals** should show how they have made effective use of previously developed and non-agricultural land. Where a proposal requires the use of agricultural land, poorer quality land should be used in preference to land of a higher quality (see also Policy ~~DP19-~~**DP18**). Proposals should allow for continued agricultural use wherever possible and/or encourage biodiversity improvements ~~around arrays~~. The assessment should pay particular attention to the impact of glint and glare on neighbouring land uses and residential amenity as well as aircraft safety, (including defence operations).
3. The assessment should be proportionate to the development proposed and include sufficient information to allow for an accurate evaluation of all impacts, both negative and positive. It should cover necessary ancillary development such as security measures, lighting, access tracks and fencing. Impacts should be considered cumulatively against those existing or consented development types with similar impacts in the surrounding area. Mitigation measures to remove or reduce adverse impacts should be identified.

### Wind energy development

4. ~~In addition to the above criteria for non-wind schemes, proposals for wind energy development of any scale (excluding microgeneration) will only be approved if:~~
  - a. ~~The proposed site is in an area identified as suitable for wind energy development in an adopted Neighbourhood Plan; and~~
  - b. ~~Following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.~~

### Monitoring and Decommissioning

5. Where planning permission establishes performance standards, applicants will be expected to demonstrate compliance through the submission of regular monitoring reports.

Proposals for temporary infrastructure will be expected to include measures for satisfactory restoration, including progressive restoration, of the site at the earliest practicable opportunity to an agreed after-use or to a state capable of beneficial after-use.

Where appropriate, planning obligations will be sought in order to secure the after-use, long term management and maintenance of the site.

#### Explanation

- 4.228. ~~4.294.~~ Strategic infrastructure includes transport, water management, telecommunications, broadband and energy generation, including decentralised, low carbon and renewable energy. Policies ~~DP26-DP25~~, ~~DP28-DP27~~ and ~~DP29-DP28~~ cover developer contributions for new infrastructure, broadband and mobile communications and transport respectively, whilst Policy ~~DP20-DP19~~ covers water infrastructure.
- 4.229. ~~4.295.~~ It is important to ensure the continued operation and potential for necessary expansion of existing strategic infrastructure, which makes an essential contribution to the sustainability of communities in Shropshire.
- 4.230. ~~4.296.~~ It is equally important to ensure that new strategic infrastructure is positively considered where it will contribute to national priorities and/or locally identified requirements and this contribution outweighs any potential adverse impacts. Such infrastructure has the potential to support to the sustainability of communities in Shropshire in the same way as existing strategic infrastructure.
- 4.231. ~~4.297.~~ Locally identified requirements for strategic infrastructure derive from the requirements of national policy and infrastructure planning programmes. These requirements are identified in the Shropshire Strategic Infrastructure and Investment Implementation Plan or Place Plans.
- 4.232. ~~4.298.~~ Planning applications for Nationally Significant Infrastructure Projects are decided by the Planning Inspectorate rather than Shropshire Council. Such decisions are guided by National Policy Statements which also provide useful guidance for local decision making. Further information is available at: <https://infrastructure.planninginspectorate.gov.uk/>
- 4.233. ~~4.299.~~ Planning applications for other strategic infrastructure in Shropshire will be determined by Shropshire Council. This policy supplements national guidance, identifying criteria which are intended to be used as a benchmark against which to assess such proposals.
- 4.234. ~~4.300.~~ Generating heat and electricity from renewable and low-carbon technologies is a good way of reducing carbon emissions, but government guidance makes it clear that the infrastructure required needs to be located and designed to avoid negative and unsustainable environmental impacts. The suitability of specific sites for development needs to be determined on an individual site basis, taking account of a range of relevant planning considerations. Applicants should show how those issues listed in the policy have been assessed. Where a particular technology is unlikely to give rise to an impact on one or more of the factors listed, the assessment should explain why this/these have been omitted.
- 4.235. ~~4.301.~~ The cumulative impacts of renewable and low carbon development require particular attention. Infrastructure developments may have combined effects where similar developments exist or are planned in the area—for example, installing a solar array where there are others, either already constructed or with planning permission, may raise concerns about changes to landscape character and loss of visual amenity. Similarly, a grouping of biomass or energy from waste proposals may lead to unacceptable traffic impacts. These cumulative effects can stretch beyond Shropshire's boundaries and applicants should be aware of the need to consider a wider sphere of influence in such situations.
- 4.236. ~~4.302.~~ The National Planning Policy Framework (February 2019) states that applications for new wind energy development involving one or more turbines should not be considered acceptable unless they are in an area identified as suitable for wind energy development in the development plan (this can be either the Local Plan or a Neighbourhood Plan). This Local Plan does not identify such areas, but Neighbourhood Plans are encouraged to do so. Where one or more wind turbines are proposed in an area identified within a Neighbourhood Plan, consistent with the National Planning Practice Guidance on Renewable and Low Carbon Energy, risks to safety must be assessed and appropriately mitigated.



## DP26. Strategic, Renewable and Low Carbon Infrastructure

The delivery of sustainable communities in Shropshire relies on the provision of new strategic infrastructure and the continued operation of existing strategic infrastructure. Proposals which are likely to affect an internationally designated wildlife site will require a project level HRA in accordance with Policy DP12.

### Existing Strategic Infrastructure

1. Development will be expected to demonstrate that it will not adversely affect, either directly or indirectly, the continued operation and potential expansion of existing strategic infrastructure.

### New Strategic Infrastructure

#### ~~Non-wind~~ RRenewable and low carbon development

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  - b. Landscape character (including the considerations within Policy DP17);
  - c. Natural assets (including the considerations within Policy DP12);
  - d. Historic assets (including the considerations within Policy DP23);
  - e. Air quality, noise and public amenity (including the considerations within Policy DP18);
  - f. Water quality and water resources noise (including the considerations within Policy DP19);
  - g. Traffic generation and the nature of vehicle movements;
  - h. The Shropshire Hills AONB (including the considerations within Policy DP24);
  - i. Hydropower applications should pay attention to fish stocks and normally be accompanied by a Flood Risk Assessment (see also Policy DP21);
  - j. Biomass, energy from waste, biogas and anaerobic digestion proposals should also address the impact on vibration, odour and dust (the latter for biomass and energy from waste only). Opportunities to recover heat and power are encouraged in accordance with Policy SP3; and
  - k. ~~Large scale ground mounted solar photovoltaic solar farm~~ pProposals should show how they have made effective use of previously developed and non-agricultural land. Where a proposal requires the use of agricultural land, poorer quality land should be used in preference to land of a higher quality (see also Policy DP18). Proposals should allow for continued agricultural use wherever possible and/or encourage biodiversity improvements. ~~around arrays~~. The assessment should pay particular attention to the impact of glint and glare on neighbouring land uses and residential amenity as well as aircraft safety, (including defence operations).
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### Wind energy development

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- ~~a. The proposed site is in an area identified as suitable for wind energy development in an adopted Neighbourhood Plan; and~~
  - ~~b. Following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.~~

### **Monitoring and Decommissioning**

- ~~5.4.~~ Where planning permission establishes performance standards, applicants will be expected to demonstrate compliance through the submission of regular monitoring reports.
- ~~6.5.~~ Proposals for temporary infrastructure will be expected to include measures for satisfactory restoration, including progressive restoration, of the site at the earliest practicable opportunity to an agreed after-use or to a state capable of beneficial afteruse.
- ~~7.6.~~ Where appropriate, planning obligations will be sought in order to secure the after-use, long term management and maintenance of the site.

### ***Explanation***

- 4.228. Strategic infrastructure includes transport, water management, telecommunications, broadband and energy generation, including decentralised, low carbon and renewable energy. Policies DP25, DP27 and DP28 cover developer contributions for new infrastructure, broadband and mobile communications and transport respectively, whilst Policy DP19 covers water infrastructure.
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