

**OLDHAM METROPOLITAN BOROUGH
COUNCIL**

LOCAL DEVELOPMENT FRAMEWORK

**RENEWABLE ENERGY
SUPPLEMENTARY PLANNING DOCUMENT**

FINAL CONSULTATION STATEMENT

**Adopted on 3rd March 2008
by
Oldham Metropolitan Borough Council**

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1. Introduction

- 1.1 The Council is required to prepare its Supplementary Planning Documents (SPDs) in accordance with procedures set out in the Town and Country Planning (Local Development) (England) Regulations 2004. Regulation 17 requires that before an SPD is adopted, a Consultation Statement be prepared setting out who was consulted in connection with the preparation of the SPD, how they were consulted, a summary of the main issues raised in those consultations and how those issues have been addressed in the SPD.
- 1.2 The SPD has also been prepared and consulted upon in accordance with the Council's adopted Statement of Community Involvement (SCI).

2. Consultation on the draft SPD

- 2.1 The draft SPD was drawn up by officers in the Council's Strategy & Resources Directorate (Environmental Policy Unit), Environmental Services Directorate (Development Control) and Regeneration Directorate (Strategic Planning and Information). The aim of the SPD is to provide guidance on the implementation of UDP Policies NR3.1 and NR3.2, which set how the Council will assess proposals for renewable energy infrastructure, either as part of a development or as a stand alone energy generating installation(s) and how the Council will implement Policy NR3.3 on renewable energy in major new developments. The policies themselves were subject to consultation and Sustainability Appraisal as part of the UDP review process (2000-2006).
- 2.2 As required by the Planning and Compulsory Purchase Act 2004, the Council carried out a Sustainability Appraisal alongside the preparation of the draft SPD. This process incorporated the requirements of the European Commission Directive 2001/42/EEC, which requires a Strategic Environmental Assessment of SPDs. The first stage of this process was the production of a Scoping Report. This involved an initial evidence gathering exercise and the identification of Plan and Sustainability Objectives. The Scoping Report is included as Appendix 1 to the Sustainability Appraisal, which is available alongside this SPD.
- 2.3 As part of the Scoping Report process the Council consulted the Environment Agency, Countryside Agency, English Nature, English Heritage, Government Office North West, Oldham Partnership, North West Regional Assembly, OMBC Environment Co-ordinator and Environment Partnership (via Oldham Partnership), United Utilities, British Wind Energy Association, Greater Manchester North Energy Efficiency Advice Centre, Energy Savings Trust, Renewables North West and Sustainability North West by letter. This consultation was carried out for five weeks between 10 July and 14 August 2006.

2.4 Appendix 1 of this document summarises the comments received and the Council's responses.

2.5 The Council also carried out an Equalities Impact Assessment on the draft SPD in order to assess its potential impact on the various equalities categories in the Borough. This was carried out by officers in the Strategic Planning and Information section on 17 July 2007. The resulting document is available alongside the SPD.

2.6 The Council also carried out a Habitats Regulations Assessment as required under Article 6(3) and 6(4) of the Habitats Directive as implemented by the draft Habitats Regulations 2006. This involved an ongoing period of consultation with the Greater Manchester Ecology Unit and Natural England. A copy of this Assessment is available alongside this SPD.

3. Formal Public Consultation

3.1 The draft SPD was subject to a period of formal consultation from 19 October 2007 to 30 November 2007.

3.2 Appendix 2 contains a list of specific Consultation Bodies and Government Departments that were invited by letter or email to comment on the draft SPD and its supporting documents.

3.3 Appendix 3 contains a list of other Consultees that were invited by letter or email to comment on the draft SPD and its accompanying documents.

3.4 A public notice was published in the Oldham Evening Chronicle on 19 October 2007 and a press release (Appendix 4) with details of the SPD was issued.

3.5 The draft SPD and its supporting documents were available on the Council's website: www.oldham.gov.uk

3.6 The draft SPD and its supporting documents and comments forms were available at public libraries, the Civic Centre One-Stop Shop and Level 12 Planning Reception and Oldham Business Centre.

3.7 All Oldham MBC Councillors and the Oldham Partnership were sent an electronic copy of the draft SPD and its supporting documents.

3.8 A letter or email was sent to those individuals and organisations on the LDF mailing list, and those that have expressed a particular interest in the draft SPD, explaining that the document was available for consultation.

3.9 A pre-consultation meeting with Eco-Schools took place on 20 September 2007 at Stanley Road Primary School in Chadderton,

attended by teachers from across the Borough who form part of the Eco-School project. This gave an overview of the draft SPD and details of how to view and comment on the draft SPD.

- 3.10 Flyers with details of the consultation on the draft SPD were sent to primary and secondary schools within the Borough.
- 3.11 A training event for Development Control officers was held on 15 November 2007, which focussed on the requirements of Policy NR3.3.

Appendix 1

Consultation on the Scoping Report – Comments received and the Council’s Responses

Respondent	Reference Number	Comment	Council Response
Government Office North West	045/RE/001/SPD	Do not wish to offer any comments.	Noted.
Environment Agency	003/RE/001/SPD	Supports the plans, policies and programmes outlined in the report, and also the key objectives, indicators and targets.	Noted.
English Heritage	004/RE/001/SPD	It is considered that the Scoping Report falls short of addressing impact upon the historic environment. Suggests including reference to the European Landscape Convention and PPS22 Renewable Energy paragraph 11 (other nationally-designated areas).	Noted, the European Landscape Convention has now been added. Reference to PPS22 and its key principles for renewable energy are already identified within the Scoping Report.
English Heritage	004/RE/002/SPD	There is no baseline information relating to the historic environment included in Table 2. It is suggested that an indicator is developed to cover this omission and include objectives to cover the historic environment. The following are suggested: <ul style="list-style-type: none"> • To preserve, protect and 	An additional sustainability objective has been included: “To have regard to the built and natural environments of the Borough”. (Note: since this stage the Core Strategy objectives have been prepared and the wording of this objective

		<p>enhance sites, features and areas of archaeological, historical and cultural heritage importance.</p> <ul style="list-style-type: none"> • To protect, enhance and manage the rich diversity of cultural and built environment and archaeological assets. • Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place. • Protect, manage and, where necessary, improve local environmental quality. • To achieve high quality and sustainable design for buildings, spaces and the public realm sensitive to the locality. 	<p>has changed. The objectives suggested by English Heritage are covered by a number of objectives in the Core Strategy Issues and Options Scoping Report and the Core Strategy Scoping Report update 1 (September 2007).</p>
English Heritage	004/RE/003/SPD	The section on Key Issues and Problems also neglects the	Noted. The additional sustainability objective (see

		<p>historic environment. The following list provides examples of the environmental problems, issues and opportunities that we would expect the SA process to take account of:</p> <ul style="list-style-type: none"> • Areas of significantly degraded landscape / townscape or areas where, on current trends, there is likely to be further significant loss of landscape / townscape character or quality. • Areas where development has had or is likely to have significant impact upon the historic environment and/or people's enjoyment of it. • Areas where landscape character or quality is being eroded because of changing farming, other land management practices or development. • Traffic congestion, air quality, noise 	<p>above) addresses issues relating to the historic environment.</p>
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		pollution and other problems affecting the historic environment.	
Countryside Agency (Now Natural England)	002/RE/001/SPD	General information and indicators relating to environmental interests are included within an appendix.	Noted.
Countryside Agency (Now Natural England)	002/RE/002/SPD	Baseline Information A2 - Oldham Borough Characterisation: The report makes no reference to part of Oldham Borough lying with the Peak National Park, although recognises that for planning purposes this is the responsibility of the National Park Authority. This should be covered here.	The SA report has to be read in conjunction with the draft SPD, which will include reference to the fact the UDP policy does not apply to that part of the Borough, which lies within the Peak District National Park.
Countryside Agency (Now Natural England)	002/RE/003/SPD	It would be helpful if the Scoping Report could refer to the Landscape Character volume for North West England and include a few sentences from the volume setting out the main features of the three character areas that are relevant to Oldham.	The Scoping Report has been amended to refer to this document.
Countryside Agency (Now Natural England)	002/RE/004/SPD	Identifying Key Sustainability Issues (A3): An additional issue to raise would be the	Policies NR3.1 and NR3.2 already address these issues.

		“landscape and visual impact” caused by renewable energy developments.	
Countryside Agency (Now Natural England)	002/RE/005/SPD	Developing the SA Framework: An objective could be added, “conserve and enhance the landscape and townscape character of the Borough and the setting of the National Park”.	An additional objective has been added – “to have regard to the built and natural environments of the Borough” - based on comments received from English Heritage. (Note: since this stage the Core Strategy objectives have been prepared and the wording of this objective has changed. The objectives suggested by English Heritage are covered by a number of objectives in the Core Strategy Issues and Options Scoping Report and the Core Strategy Scoping Report update 1 (September 2007).
Energy Savings Trust	745/RE/001/SPD	Agrees the plans, policies and programmes identified are relevant.	Noted.
Energy Savings Trust	745/RE/002/SPD	Recommends considering the following additional plans:	1) – 3) Noted & including in scoping report. 4) Included - now

		<ol style="list-style-type: none"> 1) Climate Change – the UK programme 2006. 2) Climate Change and Sustainable Energy Act 2006. 3) EU Energy Performance of Buildings Directive. 4) Eco Homes. 	Code for Sustainable Homes.
Energy Savings Trust	745/RE/003/SPD	Agrees the baseline data collected is appropriate for the SPD.	Noted.
Energy Savings Trust	745/RE/004/SPD	<p>Suggests the following are considered as indicators:</p> <ol style="list-style-type: none"> 1) Number of installations in the area that received the DTI's Low Carbon Buildings Programme funding. 2) Number of homes in fuel poverty. 3) Average SAP rating of properties. 4) Percentage of new and retrofit homes meeting EcoHomes Excellent rating. 5) Excess winter mortality. 	Noted, but it is not proposed to include any of these suggestions as indicators.
Energy Savings Trust	745/RE/005/SPD	<p>Recommends that the following sustainability issues should be considered:</p> <ol style="list-style-type: none"> 1) Renewable energy technologies on listed buildings 	<p>Bullets 1) to 3) - Noted. Policies NR3.1 and NR3.2 already address these issues. Bullet 4) – The UDP policy relates to “new” developments,</p>

		<p>and/or in conservation areas.</p> <p>2) Renewable energy technology impact on Green Belt.</p> <p>3) Renewable energy technology impact on archaeology.</p> <p>4) Reducing energy need and encouraging efficient use of energy prior to renewable energy.</p>	<p>not to reducing the energy requirements of existing developments.</p>
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Appendix 2

Specific Consultation Bodies and Government Departments consulted on the draft SPD

The following bodies are specific consultation bodies and were consulted by the Council in accordance with its Adopted Statement of Community Involvement:

- The Regional Planning Body (North West Regional Assembly)
- The Environment Agency
- The Historic Buildings and Monuments Commission for England (English Heritage)
- Natural England
- The Highways Agency
- Local Planning Authorities, County Councils or Parish Councils, any part of whose area is in or adjoins the Borough
- A Regional Development Agency whose area is in or adjoins the Borough
- Any person to whom the electronic communications code applies by virtue of a direction given under Section 106 (3) (a) of the Communications Act 2003
- Any person who owns or controls electronic communications apparatus situated in any part of the area of the Borough
- The Strategic Health Authority
- A person to whom a licence has been granted under the Section 6(1)(b) or (c) of the Electricity Act 1989
- A person to whom a licence has been granted under Section 7(2) of the Gas Act 1986
- A sewage undertaker
- A water undertaker

Government Departments

The **Government Office for the North West** will be consulted by the Council and will be the first point of contact for consultation with the following Government Departments:

- Department for Communities and Local Government (DCLG)
- Department for Culture, Media and Sport (DCMS)
- Department for Children, Schools and Families (DCSF)
- Department for Innovation, Universities and Skills (DIUS)
- Department for Environment, Food and Rural Affairs (Defra)
- Department for Business, Enterprise and Regulatory Reform (BERR)
- Department for Transport (DfT)
- Home Office

In addition, the Council will also consult the following Government Departments, where appropriate:

- Department of Health (through Regional Public Health Group)
- Ministry of Defence
- Department of Work and Pensions

- Ministry of Justice
- Office of Government Commerce (Property Advisers to the Civil Estate)

Appendix 3

General and Other Consultees

The following bodies are general consultation bodies and were consulted by the Council, where appropriate, in accordance with its Adopted Statement of Community Involvement:

- Voluntary bodies some or all of whose activities benefit any part of the Borough
- Bodies which represent the interests of different racial, ethnic or national groups in the Borough
- Bodies which represent the interests of different religious groups in the Borough
- Bodies which represent the interests of disabled persons in the Borough
- Bodies which represent the interests of persons carrying out business in the Borough

Other Consultees

The Council also consulted the following agencies and organisations, where appropriate:

- Age Concern
- Airport Operators
- British Chemical Distributors and Traders Association
- British Geological Survey
- British Waterways, canal owners and navigation authorities
- Centre for Ecology and Hydrology
- Chambers of Commerce, local Confederation of British Industry and local branches of Institute of Directors
- Church Commissioners
- Civil Aviation Authority
- Coal Authority
- Commission for Architecture and the Built Environment
- Commission for New Towns and English Partnerships
- Commission for Racial Equality
- Crown Estate Office
- Diocesan Board of Finance
- Disabled Persons Transport Advisory Committee (now part of the Inclusive Environment Group)
- Electricity, Gas and Telecommunications Undertakers, and the National Grid Company
- Environmental groups at national, regional and local level, including:
 - (i) Campaign to Protect Rural England (Lancashire branch only)
 - (ii) Friends of the Earth
 - (iii) Royal Society for the Protection of Birds
 - (iv) Wildlife Trusts
- Equal Opportunities Commission
- Fire and Rescue Services

- Forestry Commission
- Freight Transport Association
- Gypsy Council
- Health and Safety Executive
- Help the Aged
- Housing Corporation
- Learning and Skills Councils
- Local Agenda 21 including:
 - (i) Civic Societies
 - (ii) Community Groups
 - (iii) Local Transport Authorities
 - (iv) Local Transport Operators
 - (v) Local Race Equality Councils and other local equality groups
- National Playing Fields Association
- National Trust
- Network Rail
- Passenger Transport Authorities
- Passenger Transport Executives
- Police Architectural Liaison Officers / Crime Prevention Design Advisors
- Port Operators
- Rail Companies and the Rail Freight Group
- Regional Housing Boards
- Regional Sports Boards
- Road Haulage Association
- Royal Mail Group plc
- Sport England
- The Home Builders Federation
- Traveller Law Reform Coalition
- Water Companies
- Women's National Commission

LDF Mailing List

The Council also notified those individuals and organisations on the LDF mailing list that consultation was underway on the draft SPD and accompanying documents.

OLDHAM IS GATHERING PACE WITH RENEWABLE ENERGY

Members of the public are being asked for their opinion on the draft Supplementary Planning Document on 'Renewable Energy' that has been prepared by the Council's Regeneration Directorate.

Oldham Council is in the process of preparing its Local Development Framework. This will be the new Plan for the Borough. As part of this, a draft Supplementary Planning Document (SPD) has been prepared on 'Renewable Energy'. This is aimed at expanding on renewable energy policies in the Oldham Metropolitan Borough Unitary Development Plan. The SPD further builds on Oldham's leading role in promoting renewable energy.

The Council is inviting comments on this document during a six-week period that runs from **19 October 2007 to 30 November 2007**.

Councillor Dave Hibbert, the Cabinet Member for Environment and Regeneration said: "We would like to urge members of the public to use this opportunity to give us feedback on the document's content and clarity. This will make sure that the documents are of the best possible value to those who will use them.

The document provides important guidance on how the Council assesses proposals for renewable energy schemes and large developments that require 10% of energy to be provided through on site renewable energy generation. This is an important contribution to promoting sustainable energy and helps tackle climate change and further builds on our leading role in Greater Manchester in promoting renewable energy. "

The documents may be seen on the Council's website at www.oldham.gov.uk, as well as at local libraries, Civic Centre Planning Reception (Level 12), Civic Centre One Stop Shop, and Oldham Business Centre.

If you want to know more, or find out how to comment, please contact the Strategic Planning and Information section on (0161) 770 ext 4139 or 4151/4163, or email spi@oldham.gov.uk.

Appendix 5 – Responses to Consultation on draft SPD and Supporting Documents

Oldham Metropolitan Borough Council

Consultation Response Statement

Supplementary Planning Document on: 'Renewable Energy'

In accordance with Regulation 19 (a)(i) of the Town and Country Planning (Local Development) (England) Regulations 2004, this statement sets out a summary of the main issues raised in representations received to the consultation on the draft 'Renewable Energy' Supplementary Planning Document, and how these have been addressed.

(Comments with reference number ending in SPD relate to the draft SPD, those ending in SA relate to the Sustainability Appraisal, those ending in HRA relate to the Habitat Regulations Assessment.)

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
1	Network Rail	044/RE/001/SPD	Regarding Policy NR3.2 the policy states that developments must not have an unacceptable impact on (l) highway or aviation safety. If considering the impact of wind turbines on forms of transportation would welcome reference to the operation of the railway network. Wind turbines can create the following concerns to Network Rail:	Objection	The Unitary Development Plan (adopted 2006) must be read as a whole and any development proposal would have to have regard to other Unitary Development Plan Policies in addition to the SPD. Therefore Policy T1 is also relevant, which states that the Council will protect and improve the Borough's

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
			<ol style="list-style-type: none"> 1) Turbines falling onto railway lines, however remote the location; 2) In terms of AC power transients there is potential for interference with track circuits if equipment is switched off or altered to another transient. 3) The risk of damage to signalling equipment in the event of a lightening strike with unusually tall structures located close to the railway line. 		transport network through the land use planning system to allow the safe and convenient movement of people and goods.
2	English Heritage	004/RE/001/SPD	<p>Recommend referring to 5 websites with links to documents on renewable energy and the historic environment. They concern:</p> <ul style="list-style-type: none"> Biomass Energy Wind Energy Climate Change Energy Conservation Micro Wind 	N/A	The documents referred to are all available on the Historic Environment Local Management (HELM) website. A reference to the website will be added to Appendix 5 of Useful Links.

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
3	Yorkshire Forward	043/RE/001/SPD	No comments.	N/A	None required.
4	Government Office North West	045/RE/001/SPD	No comments.	N/A	None required.
5	Home Builders Federation	122/RE/001/SPD	Objects to Policy NR3.3. The house building industry is serious about reducing the carbon footprint of housing and is supportive of the Code for Sustainable Homes and the 2016 Commitment. House builders are working to improve the energy efficiency of new housing and finding ways of incorporating energy efficient technologies (where relevant) in the design process. However, the industry believes that the best way to improve energy efficiency of new housing and to promote renewable energy is through innovations in materials and technology development and economies of scale not through targets that are impossible to measure.	Objection	<p>The requirement for 10% predicted energy to be provided from on-site renewable sources comes from Policy NR3.3 within the Unitary Development Plan, which has been tested at an Inquiry and found to be valid. The policy was adopted in 2006 and therefore cannot be amended.</p> <p>However, the Unitary Development Plan must be read as a whole document and therefore the Design Chapter of the Unitary Development Plan must also be considered when proposing a development, particularly Policy D1.1 (i) which encourages high</p>

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
			The prescription of minimum percentages is neither constructive nor beneficial in helping to tackle the long-term challenges of climate change.		standards of energy efficiency, making some provision to utilise sources of renewable energy and (iii) eliminating unnecessary surface water run off.
6	Home Builders Federation	122/RE/002/SPD	The generation of energy via micro-renewables will do little to help reduce carbon emissions (because of the energy consumed by domestic appliances inside the home). The reduction of CO ² is best tackled through the design and construction of homes, improvements to existing stock, changes in consumer preferences and individual behaviours and at the macro-scale through investment in cleaner power generation by central government.	Objection	The Unitary Development Plan must be read as a whole and the Design Chapter of the Unitary Development Plan encourages high standards of energy efficiency. Policy D1.2 specifically deals with designing for energy efficiency. In addition, the adopted Urban Design Guide SPD encourages energy efficiency in new developments. It should also be noted that the Policy deals with change of use and conversions as well as new build.

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
7	Home Builders Federation	122/RE/003/SPD	A plethora of micro-renewables spread across the UK's 26 million existing homes, needing regular cleaning, routine servicing and eventual replacement is an inefficient use of resources.	Objection	Not a relevant comment to the SPD.
8	Home Builders Federation	122/RE/004/SPD	Many of these technologies are in their infancy and are relatively untested. Only solar collectors are a viable on-site option at present, all the other options are expensive, inefficient and offer no security of supply in the longer term. This may adversely affect the saleability of housing schemes if people are wary about untested technologies and implications of breakdown. It will also add to the medium and long-term management costs of the social rented sector.	Objection	The Energy Statement that is required to be submitted with proposals for renewable technologies would provide the evidence base to demonstrate whether each technology will be viable for a particular site.
9	Home Builders Federation	122/RE/005/SPD	Would like to see the introduction of renewable energy technologies through the higher	Objection	The Code for Sustainable Homes is expected to become mandatory after April

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
			stages of the Code for Sustainable Homes in accordance with the nationally agreed timetable.		<p>2008. The Proposal to introduce a Code for Sustainable Homes (December 2007) outlines that the Building Regulations set mandatory standards for design and construction of buildings, however they offer no incentive for exceeding minimum standards. It is intended that the Code for Sustainable Homes will replace EcoHomes and will be linked closely to the Building Regulations.</p> <p>In addition, the Council's Urban Design Guide SPD, adopted October 2007, encourages developers to meet standards within the Code for Sustainable Homes.</p>
10	Derbyshire County Council	011/RE/001/SPD	No comments.	N/A	None required.

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
11	Disability Rights Commission	111/RE/001/SPD	No comments.	N/A	None required.
12	United Utilities	037/RE/001/SPD	No comments.	N/A	None required.
13	Natural England	002/RE/001/SPD	Welcomes the SPD. Satisfied that their comments made at the scoping stage of the Sustainability Appraisal have been taken into account. No further comments. (NB: The Council is required to seek the views of the four statutory environmental consultation bodies designated in the SEA Regulations: the Countryside Agency and English Nature (now merged and renamed Natural England), English Heritage and the Environment Agency on the scope and level of detail of the environmental information to be included in the SA Report).	Support	Noted.

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
14	RSPB	732/RE/001/SPD	Object to SPD. Do not believe that the SPD fully recognises and explains the effect that wind development can have on birds.	Objection	The SPD expands on three Renewable Energy Unitary Development Plan Policies. The Unitary Development Plan must be looked at as a whole and therefore there are other policies that should be taken into account in any development proposal that could have an effect on birds. This includes Policy OE2.3 on Habitat Protection, which does not permit development that would harm the nature conservation of designated sites, such as Special Protection Areas for Birds, Sites of Biological Importance and non-designated sites. Policy OE2.4 on Species Protection does not allow development that would harm a species protected by law or other species identified in the Oldham Biodiversity Action

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
					Plan, except where mitigation methods can be implemented to ensure that there will be no adverse impact on the species or its habitat.
15	RSPB	732/RE/002/SPD	Clearer explanation required about the effects of wind farms on birds, habitat loss, displacement/ disturbance, collision and their habitat.	Objection	Paragraph 3.21 of the SPD outlines that an assessment should be made where appropriate of the impact of renewable technologies on biodiversity and nature conservation. This is the applicants' responsibility to provide. Paragraph 3.22 of the SPD refers to the Conservation (Natural Habitats & c) Regulations 1994 and Planning Policy Statement 9 "Biodiversity and Geological Conservation" which applicants are required to have regard to. As stated above Policies OE2.3 and OE2.4 in the Unitary Development Plan offer further guidance.

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
16	RSPB	732/RE/003/SPD	Needs to be more guidance on the effects that wind developments can have on areas outside Sites of Special Scientific Interest/ Special Protection Areas for Birds (SPA). Many bird species breed on (and are qualifying features of) an SPA but feed/fly to areas outside designated areas therefore these areas are functionally linked to a SPA and an appropriate assessment may therefore be required.	Objection	Paragraph 3.23 of the SPD states that an applicant is advised to contact the Council's Development Control section to discuss if a Habitat Regulations Assessment is required for a particular development proposal. The Unitary Development Plan must be looked at as a whole and therefore there are other relevant policies such as Policy OE2.3 on Habitat Protection, which does not permit developments that would cause harm to the nature conservation of designated sites, such as Special Protection Areas for Birds, Sites of Biological Importance and non-designated sites, unless the development falls within the exceptions criteria.

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
					Policy OE2.4 on Species Protection does not allow development, unless the development falls within the exceptions criteria, which would harm a species protected by law or other species identified in the Oldham Biodiversity Action.

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
17	RSPB	732/RE/004/SPD	On shore wind farms in appropriately located areas can be damaging to nature conservation interests, even away from European Sites – this needs to be explained.		The Unitary Development Plan must be read as a whole document and therefore Policy OE2.3 is relevant. This deals with habitat protection concerning Special Protection Areas for Birds, Special Areas of Conservation, Sites of Special Scientific Interest or Sites of Biological Importance (Grades A-C); Local Nature Reserves or other non-designated sites containing landscape features likely to be of substantive nature conservation value such as watercourses and their banks, ponds, dry stone walls, hedgerows, trees, woodland and moorland.

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
18	RSPB	732/RE/005/HRA	<p>Part 10 (Conclusion)- The 500m buffer in paragraph 2 could be misleading. "Important areas" for "sensitive bird" species needs to be identified. This would include: Qualifying species of the SPA/SSSI; species which breed in high densities on Moorland/ SPA edge habitats – breeding waders, twite, some raptors.</p> <p>Cumulative impact and the effect on birds/habitat needs to be more clearly explained.</p>	Objection	<p>The 500m buffer has been agreed with the Greater Manchester Ecology Unit, who provides specialist advice to, and on behalf of, the ten district councils that make up Greater Manchester on biodiversity, nature conservation and wildlife issues.</p> <p>Important areas for sensitive bird species, such as Special Protection Areas for Birds are identified on the proposals map and dealt with through Policy OE2.3 in the Unitary Development Plan.</p> <p>Paragraph 2.14 of the SPD deals with the cumulative impact of the development.</p>

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
19	Highways Agency	005/RE/001/SPD	Agency is generally supportive of the content. Pleased to see recognition given to highway safety in section 2 (Paragraph 4.2).	Support	None required.
20	Highways Agency	005/RE/002/SPD	Suggest a change to paragraph 4.6, which encourages early consultation with the Council's Highway and Transportation and the Civil Aviation Authority. Given the role of the Highways Agency an additional reference to consultation with the Highways Agency where appropriate should be included in Paragraph 4.6. Appropriate circumstances would be for any development near to or visible from a motorway or trunk road.	Objection	The Statement of Community Involvement, adopted April 2007, sets out who the Development Control section of the Council will consult. The Highways Agency is listed within the SCI and therefore an additional reference is not required.

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
21	North West Regional Assembly	001/RE/001/SPD	Under section 2.12 of the SPD reference is made to 'Policy ER13 (Renewable Energy and Energy Efficiency of RSS (2003)'. Policy ER13 appears in Regional Planning Guidance for the North West (RPG13) not the draft Regional Spatial Strategy. Recommend replacing Regional Spatial Strategy with RPG13.	Objection	Agree to replace RSS with RPG13.

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
22	North West Regional Assembly	001/RE/002/SPD	<p>Under section 2.15 reference is made to recommendations within the Examination in Public Panel Report (May 2007) regarding identifying broad locations for renewable energy developments. However, the Panel also recommends that the part of Policy EM17 dealing with criteria should be re-drafted. Recommend referring to this further recommendation under section 2.15 or 2.14.</p> <p>The Assembly is commissioning research to identify broad areas at the regional and sub-regional level where development of particular types of renewable energy may be considered appropriate.</p>	Objection	<p>Agree to amend paragraph 2.15 to refer to the further recommendation made:</p> <p><i>"It also recommends the criteria stated within Policy EM17 should be re-drafted."</i></p>

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
23	North West Regional Assembly	001/RE/003/SPD	<p>Policy NR3.3 is in accordance with Policy EM17 of the submitted Draft RSS but it should be noted that the Panel recommends that section of Policy EM17 that deals with on-site generation should become a new policy (EM18 – On Site Generation) and amended as follows:</p> <p>Replace “1000sq metres” with “500sq metres”</p> <p>Replace “10 or more units” with “5 or more units”.</p>	Support	<p>Agree to add sentence at the end of paragraph 2.15 to refer to Policy EM18 and the amended thresholds.</p> <p><i>“In addition, the Panel Report recommends that the section of Policy EM17 that deals with on-site generation should become a new policy (EM18 – On Site Generation) with amended thresholds from “1000sqm”to “500sqm” and from “10 or more units” to “5 or more units”.</i></p>

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
24	North West Regional Assembly	001/RE/004/SPD	<p>Recommends the addition North West Draft Regional Spatial Strategy Examination in Public – October 2006-February 2007- Report of the Panel (Northwest Eip, 2007) to Appendix 4 Useful Documents.</p> <p>In addition the term draft should be removed from the following documents: Rising to the Challenge – A Climate Change Action Plan for England's Northwest 2007-2009 (NWDA, 2006)</p> <p>North West Sustainable Energy Strategy (NWRA, 2006)</p>	N/A	<p>Agree to add reference to the recommended document in Appendix 4.</p> <p>Agree to remove the word 'draft' from the listed documents.</p>

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
25	North West Regional Assembly	001/RE/005/SPD	May wish to add www.climatechangenorthwest.co.uk to the list of Useful Links in Appendix 5. This is the website of the Climate Change Partnership which carries out information on the Climate Change Action Plan for England's Northwest.	N/A	Agree to add the recommended website to Appendix 5.

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
26	North West Regional Assembly	001/RE/006/SPD	Appendix 6 lists Renewable Energy Indicators to be Monitored. In addition to monitoring the "Percentage of large developments incorporating renewable energy generation" you may wish to record the percentage of the development's energy requirements that are met by renewable energy.	N/A	<p>Policy NR3.3 will lead to the capturing of this information through the Energy Statement. If the amount of predicted energy to be generated through on-site renewable sources is not 10% the applicants will be required to state what percentage is viable and provide a reasoned justification explaining why 10% cannot be achieved and the reasons for selecting/ dismissing technologies.</p> <p>Therefore a further indicator will not be added.</p>

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
27	National Trust	117/RE/001/SPD	<p>Generally supports the SPD, however requests that specific consideration is given to:</p> <p>Paragraph 3.17 – it is not only the setting of listed buildings that needs to be considered but also those of other designated heritage features (Conservation Areas, Registered Historic Parks and Gardens and Scheduled Ancient Monuments) in accordance with National planning policy and RSS. Amend to refer to other designations.</p>	Support	<p>The Unitary Development Plan must be read as a whole when proposing any development and therefore the following policies are relevant. Policy C1 is concerned with Conservation of the Historic Environment and covers Listed Buildings, Conservation Areas, Historic Parks and Gardens, Scheduled Ancient Monuments, Significant Archaeological Remains; and other non-designated buildings, areas, landscapes, or structures which the council considers to be demonstrably of significant archaeological or historical interest. Policy C1.1 deals with development within or affecting the setting of Conservation Areas and Policy C1.9 deals with Development Affecting the Setting of a Listed Building.</p>

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
					<p>Policy C1.11 considers the Preservation of the Sites of Important Archaeological Remains and their Settings and Policy C1.13 deals with the Protection of Parks and Gardens of Special Historic Interest, which covers the setting of any part of a designated historic park or garden.</p> <p>It is considered therefore that reference to other designations are not required.</p>

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
28	National Trust	117/RE/002/SPD	Paragraph 3.18 - the impacts upon landscapes and upon the natural environment and their settings also needs to be considered in accordance with the adopted and draft RSS. Amend to refer to designated landscapes and nature conservation sites and their settings.	Objection	<p>Policy OE2.1 in the Unitary Development Plan states that the Council will protect the character of the landscape and maintain local distinctiveness. Applicants are required to demonstrate how any proposed development in or adjacent to open land areas of the Borough conserves and/or enhances the quality and character of the landscape. In addition Policy D1.1 aims to ensure that new developments a) reinforce or complements landscape character and h) does not harm any significant views or vistas and the setting of any significant landmarks.</p> <p>Therefore further reference is not necessary.</p>

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
29	National Trust	117/RE/003/SPD	<p>Paragraph 3.26 – would be appropriate to draw attention to other national bodies such as the Ramblers Association, and the National Trust.</p> <p>Request specific references to the above.</p>	Objection	<p>Add sentence to the end of paragraph 3.26 to say:</p> <p><i>“The Council’s adopted Statement of Community Involvement outlines the bodies that will be consulted, as appropriate.”</i></p>
30	National Trust	117/RE/004/SPD	<p>Paragraph 4.4 whilst covered in the preceding section on all renewables it is important to be clear at this point that it is not just wind turbines that have the greatest visual impacts, it is wind farms – the visual impact of many kilometres of access track, for example, will often be visually significant. Amend opening words to read “Wind farm developments (including related infrastructure such as access tracks and grid connection equipment) are likely ...”</p>	Objection	<p>Delete “<i>wind turbines</i>” and replace with “<i>wind developments</i>” to keep consistent with the Unitary Development Plan Policy wording.</p>

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
31	National Trust	117/RE/005/SPD	<p>Paragraph 4.4/4.5 – whilst the text makes specific reference to cumulative impacts this is not picked in the additional advice of the SPD. Additional advice on this topic should be added making it clear that visual assessments will need to take into account the cumulative impact of the proposed development with a) existing wind farms, b) wind farms with approval that have not yet been constructed, and c) wind farms that are still at the planning stage.</p> <p>Add text regarding the additional information required in respect of cumulative impacts as referred to above.</p>	Objection	<p>Agree with the need to expand on cumulative impacts: Add in below sentences in paragraph 4.5 after second sentence:</p> <p><i>“This guidance also provides advice on assessing cumulative landscape impacts and visual effects between paragraphs 5.21 and 5.24. It states that cumulative visual effects concern the degree to which renewable energy development becomes a feature in particular views (or sequences of views), and the effect this has upon the people experiencing those views.”</i></p>

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
32	National Trust	117/RE/006/SPD	<p>Paragraph 4.12 – It is considered in all cases where infrastructure comes to the end of its life and/or is redundant that it should be required to be removed.</p> <p>Delete the words “Where appropriate” from the start of the second sentence.</p>	Objection	<p>Delete from paragraph 4.12 “Where appropriate the Council will impose planning conditions to ensure the removal of apparatus and the mitigation and remediation of the site to an acceptable and appropriate standard.”</p> <p>Replace with “<i>As explained in paragraph 13.90 of the Unitary Development Plan the Council will expect sites to be restored to a condition which is as close as possible to its original state, as appropriate to its location and to the works necessary to secure its decommissioning. It is important that the decommissioning process does not have a greater impact than the original development, and this may depend on the characteristics of the site.</i>”</p>

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
33	National Trust	117/RE/007/SPD	Paragraph 5.12 – the third sentence requires some editing.	Objection	Delete third sentence for clarity.
34	Manchester Airport	070/RE/001/SPD	<p>Object to Policy NR3.2</p> <p>Paragraph 4.6 of the SPD states that early consultation is advised with the Civil Aviation Authority. Government guidance with regard to aerodrome safeguarding is published in Circular 1/2003. This superseded Circular 2/93 and marked the transference of safeguarding duties from the CAA to the relevant aerodromes. Aerodromes have become a statutory consultee to the planning process, with the CAA taking the role of safety regulator. The paragraph should be amended to reflect this.</p>	Objection	<p>The Statement of Community Involvement, adopted April 2007, sets out who the Development Control section of the Council will consult. The Civil Aviation Authority is included in this list.</p> <p>Agree to change reference from the 'Civil Aviation Authority' to the '<i>relevant Civil Aerodrome(s)</i>'.</p> <p>Add at the end of paragraph 4.6 "<i>The Statement of Community Involvement, adopted April 2007, sets out who the Development Control section of the Council will consult on planning applications.</i>"</p>

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
35	Manchester Airport	070/RE/002/SPD	<p>The SPD does not detail how wind turbines can impact on aviation safety. Turbines can present as a physical obstacle to aircraft due to their size, but can also affect signals radiated from and received by aeronautical systems (regardless of their size), as the rotating blades create electromagnetic disturbance, which can degrade the performance of these systems and cause incorrect information to be received.</p>	Objection	<p>The Unitary Development Plan must be read as a whole and any development proposal would have to have regard to other Unitary Development Plan Policies in addition to the SPD. Therefore Policy T1 is relevant, which states that the Council will protect and improve the Borough's transport network through the land use planning system to allow the safe and convenient movement of people and goods.</p> <p>In addition paragraph 4.6 of the SPD states that early consultation is advised with the Council's Highways and Transportation section and the relevant civil aerodrome(s). This would give the opportunity for such issues to be discussed.</p>

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
36	Manchester Airport	070/RE/003/SPD	<p>Paragraph 4.6 states that a detailed impact statement is unlikely to be required for domestic scale turbines. This statement should be removed as in certain circumstances (location, blade type, landscape, position etc) a domestic turbine can pose a greater safety risk to aircraft than a large wind farm.</p> <p>Paragraph 4.6 should read “Early consultation is advised with the Council's Highways and transportation section and <i>with the relevant Aerodrome Safeguarding Authority.</i> <i>Turbines can create a risk to aviation safety by presenting as a physical obstacle to aircraft due to their size, but they can also affect aeronautical systems, as the rotating blades create electromagnetic disturbance, which can degrade the performance of these systems and cause incorrect information</i></p>	Objection	<p>Following on from consultation on the Permitted Development Rights for Householder Microgeneration paper (DCLG, April, 2007) the Governments Response to Consultation Replies (November, 2007) outlines their intention to provide permitted development rights for the following types of microgeneration: solar panels, wind turbines, heat pumps, biomass and combined heat and power, subject to specific limits and conditions that will ensure that any adverse impact on others is not significant.</p> <p>For this reason it is not considered necessary to request a detailed impact statement for domestic scale turbines.</p>

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
			<i>to be received.</i> Any planning application should be accompanied by a detailed statement outlining how the development will impact, if at all, on highways and aviation safety.		

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
37	Environment Agency	003/RE/001/SPD	<p>Supports the SPD and its aim of promoting a more sustainable approach to energy and help tackle climate change.</p> <p>Need to know what effect renewable energy technologies could have on the environment. The SPD makes no reference to consideration of flood risk. For any major application or an application that lies within an area of medium/high risk (Flood Zones 2/3) a flood risk assessment will need to be provided. This should follow the principals as set out in Annex E of PPS25.</p>	<p>Support</p> <p>Objection</p>	<p>Noted.</p> <p>The Unitary Development Plan must be read as a whole and therefore Policy NR2.2 "Flooding and Flood Protection" is of relevance. The Council also indicates the Flood Zones on the Unitary Development Plan Proposals Map (as from 2006) provided by the Environment Agency and areas which have previously suffered from localised flooding.</p> <p>In addition the Association of Greater Manchester Authorities (AGMA) has commissioned consultants to undertake a Greater Manchester Strategic Floodrisk Assessment that will inform future the Local Development Frameworks across the 10 districts.</p>

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
38	Mr Paul Monaghan	482/RE/001/SPD	Support for micro generation at 5.2	Support	Noted.
39	Mr Paul Monaghan	482/RE/002/SPD	Paragraph 5.2 requires 10% of predicted energy requirements to be provided on site from renewable energy sources. This is difficult in practice. An alternative may be for a higher amount to be generated off-site, but in the area, or for developments to meet various BREAM standards.	Objection	<p>The requirement for 10% predicted energy to be provided from on-site renewable sources comes from Policy NR3.3 within the Unitary Development Plan, which has been tested at an Inquiry and found to be valid. The policy was adopted in 2006 and therefore the policy cannot be amended.</p> <p>The Council's Urban Design Guide SPD, approved October 2007, encourages developers to meet standards within the Code for Sustainable Homes.</p>
40	Environmental Policy, Strategy and Resources Directorate, OMBC	727/RE/001/SPD	Supports SPD to help assist policy interpretation and the consistent implementation of associated renewable policies.	Support	Noted.

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
41	Environmental Policy, Strategy and Resources Directorate, OMBC	727/RE/002/SPD	<p>Recommend inclusion of attached template (Appendix 6) for applicants and Development Control officers to help planning officers and developers assess each scheme using a standard template to provide a summary. This would also help prepare the Annual Monitoring Report and ease of reference. This relates to Policy NR3.3 and expands on annex NR3.3 C.</p> <p>The template should be submitted as a cover sheet with other required information.</p>	Support	<p>Agree to incorporate the template into the SPD (Annex 3.3 d) although it is recognised the submission of the template alongside the planning application documents would be optional.</p> <p>Add in new paragraph 5.27:</p> <p><i>“A template has been prepared to help capture the information required by Policy NR3.3 alongside the Energy Statement (Annex NR3.3 D). It can be included within the Energy Statement that is required as part of the SPD (see paragraph 5.20 in SPD) but it is not a replacement for the Energy Statement itself”.</i></p>

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
42	Greenfield and Grasscroft Residents Association	644/RE/001SPD	Support the strategic aims, however have concerns about the possible applications regarding the criteria stated in Policy NR3.1. Specific statutory guidelines are needed outlining what constitutes "unacceptable impact". NR3.1 relies on subjective judgements. A more measured and planned approach is required.	Objection.	Policy NR3.1 was adopted in 2006 after the public inquiry and therefore the policy wording cannot be amended. Pages 9 to 14 of the SPD outline how the Council will make its response to each of the criteria stated in Policy NR3.1. The SPD is being prepared within the framework of the Planning and Compulsory Purchase Act (2004).

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
43	Greenfield and Grasscroft Residents Association	644/RE/002/SPD	Concern over Paragraph 4.2. Whilst OMBC cannot change the policy wording of NR3.1, supplementary guidance notes should be provided to ensure that decisions are taken with reference to specific guidance to specific, quantifiable criteria.	Objection	The Planning and Compulsory Purchase Act (2004) has replaced Supplementary Planning Guidance (SPG) with Supplementary Planning Documents (SPDs) as part of the Act. This document is an SPD that provides further specific guidance on the Renewable Energy Policies. The SPD also refers to other specific guidance to offer further help, such as "The Guidelines for Landscape and Visual Impact Assessment (the Guidelines)" which should be referred to.
44	Greenfield and Grasscroft Residents Association	644/RE/003/SA	Agrees with highlighting our future need to improve and increase the use of renewable energy and that OMBC in this regard is supporting European Directives.	Support	Noted.

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
45	Greenfield and Grasscroft Residents Association	644/RE/004/HRA	Statutory requirements should be laid down to require potential developers within the Rochdale Canal and the South Pennine Moors to consult with a list of Agencies e.g. Environment Agency, Natural England etc the names of which should all be stated.	Objection	The Habitat Regulation Assessment has been prepared to meet the requirements under Articles 6(3) and (4) of the Habitats Directive. Paragraph 3.22 of the SPD outlines which agencies should be consulted. Paragraph 3.23 of the SPD outlines that applicants are advised to contact the Development Control section to discuss if a Habitat Regulations Assessment is required for a particular development proposal. The Statement of Community Involvement sets out who the Council will consult when developments are proposed.
46	The Theatres Trust	526/RE/001/SPD	No Comment.	N/A	None required.

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47	Saddleworth Moors Action Group	744/RE/001/SPD	Objecting. Paragraph 2.2 first bullet point – It is important to recognise that the primary purpose of the government's policy to encourage the development of renewable energy is to bring about reduction of CO ² emissions. Reference at the head of this list is welcome.	Objection	The SPD expands on the Council's adopted Unitary Development Plan. Paragraphs 13.64 to 13.71 of the Unitary Development Plan set out the context for the Renewable Energy Policies, covering Government Policy, which therefore deals with this issue sufficiently.
48	Saddleworth Moors Action Group	744/RE/002/SPD	Paragraph 2.7 - Additional references are required to include both the Companion Guide to PPS 22 (as referred to in later sections) and the Energy White Paper of 2007. Suggested change: Line 5 Communities ", and PPS22 "Renewable Energy" <u>together</u> <u>with its Companion Guide, and</u> <u>the Energy White Paper of 2007.</u>	Objection	Agree to add after PPS22 "Renewable Energy": <i>"...together with its Companion Guide, and the Energy White Paper of 2007."</i>

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
49	Saddleworth Moors Action Group	744/RE/003/SPD	<p>Paragraph - 2.14 The list of eleven criteria under the third bullet point is long and confusing in its layout. The text would be clearer if each item had a line(s) to itself and was indicated either by a further-indented bullet point or some device to show that the items are a sub-set of this point.</p> <p>Suggested change: Line 6 Criteria under the third bullet point should be set out in sub-headings.</p>	Objection	Agree to set out criteria more clearly.

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50	Saddleworth Moors Action Group	744/RE/004/SPD	<p>Under the Regional Spatial Strategy (paragraph 2.14) section on the second bullet point there is insufficient distinction between visual effects and landscape effects. These two are clearly related but are separately considered in relevant guidance and in the scoping of Environmental Impact Assessments (note, for example the distinction made in sections 3.13-19 below, and to the title of the recommended guidelines quoted in 3.15). It would be better to subdivide this topic so that the distinction is clearer. Suggests the concept of visual impact should be defined so that it relates to the 'receptors'. This could be followed by reference to landscape in terms of character and sensitivity (correct spelling mistake).</p> <p>Suggested Change: Bullet point two should read:</p>	Objection	The wording from paragraph 2.14 is taken from the submitted draft RSS Policy EM17 (January 2006) to set the regional context and therefore it is not appropriate to re-word this.

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			<p>Acceptability of the location/scale of the proposal; [new point] and its visual impact in relation to residents and others who value and experience the countryside; [new point] the character and sensitivity sensitivity of the surrounding landscape;</p>		Amend spelling mistake.
51	Saddleworth Moors Action Group	744/RE/005/SPD	<p>Under the Regional Spatial Strategy (paragraph 2.14) section the sixth bullet point referring to the Green Belt should be phrased so as to reflect the wording of NR3.1 (g) by including the words 'visual amenity'.</p> <p>Suggested change: Maintenance of the openness and visual amenity of the Green Belt.</p>	Objection	The wording from paragraph 2.14 is taken from the submitted draft RSS Policy EM17 (March 2006) to set the regional context and therefore it is not appropriate to re-word this.

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
52	Saddleworth Moors Action Group	744/RE/006/SPD	Paragraph 3.1 - The phrase 'not exclusively about mass wind farms' indicates that this policy does include them amongst the other variants. There is some potential for confusion from the text of the context 1.1, which in the first bullet point states that Policies NR3.1 and NR3.2 relate to assessments made other than those of EIA development. Presumably this actually means that while the SPD covers sub-EIA projects, these first two policies are not confined to such projects.	Objection	The Council does not believe that there is potential for confusion. Policies NR3.1 and NR3.2 relate to all renewable energy developments, including those which do not require an Environmental Impact Assessment.

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
53	Saddleworth Moors Action Group	744/RE/007/SPD	<p>Paragraph 3.9 - The description of 'shadow flicker' is insufficient and misleading. It fails to say that this very specific condition occurs exclusively within buildings where the sole source of exterior natural daylight is intercepted by turbine blades. There are specific parameters, and a dedicated software programme to which readers should be referred. It is also necessary to say that there are other light interception effects such as glinting or the creation of shadows, which will occur outdoors.</p> <p>3.9 Line 3 ...wind turbine. and cast a shadow that flickers as the blades rotate.</p>	Objection	Shadow flicker may also impact on road users and horse riders; therefore it is not appropriate to focus solely on the impact of shadow flicker on buildings.

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
			<p><u>Shadow flicker may then occur within buildings for short periods as a stroboscopic effect if the sole source of exterior natural daylight is intercepted by turbine blades.</u></p>		
54	Saddleworth Moors Action Group	744/RE/008/SPD	<p>Paragraph 3.10 - In the case of wind turbines it should be stated that a noise assessment should identify any noise sensitive properties.</p> <p>Suggested change: Line 6 ... a noise assessment <u>identifying sensitive properties</u> to be submitted</p>	Objection	<p>Add sentence to end of paragraph 3.10.</p> <p><i>“This should identify the sound power of the technology to be installed and any effects on nearby noise sensitive properties”.</i></p>

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
55	Saddleworth Moors Action Group	744/RE/009/SPD	<p>Paragraph 3.15 - There is no doubt that wind turbines are the most visually prominent form of renewable technology, especially when in cumulation with other installations. A typical zone of visual influence is at least 15km and up to 30km radius depending on the location, size and number of turbines in a project.</p> <p>Suggested Change: Line 2 ... apparatus are perhaps the most visually prominent.</p> <p>Line 4 insert after end of second sentence <u>A typical zone of visual influence is at least 15km and up to 30km radius depending on the location, size and number of turbines in a project.</u></p>	Objection	<p>Insert new sentence in paragraph 3.16 after second sentence to read "<i>The Companion Guide to PPS22 paragraph 5.20 outlines examples of relevant information that may be submitted as part of the assessment of landscape and visual impact.</i>"</p> <p>Insert new sentence to Paragraph 4.5 after first sentence to read: "<i>Paragraph 5.20 of the Companion Guide refers to relevant information that may be submitted as part of an assessment of landscape and visual impact.</i>"</p>

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
56	Saddleworth Moors Action Group	744/RE/010/SPD	<p>Paragraph 3.16 - The text should refer to assessment of both landscape and visual impact; with reference to consider the need for formal EIA to be determined by a screening dialogue with the Council.</p> <p>Suggested Change: Line 6 ... assessment of landscape and visual impact, <u>following a screening dialogue with the Council to determine the need for a formal Environmental Impact Assessment.</u></p>	Objection	<p>Amend paragraph 3.16, second sentence, to read: “...an appropriate assessment of the visual amenity of the local area, including landscape character.”</p> <p>Also, amend last sentence of paragraph 4.5 to read: “...visual amenity, including landscape character.”</p> <p>Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 sets out when a screening opinion is required. This includes developments of more than 2 wind turbines, or over 15m or exceeding 0.5 hectares. Therefore a screening dialogue is not always necessary.</p>

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57	Saddleworth Moors Action Group	744/RE/011/SPD	<p>Paragraph 3.17 - When considering the various designations listed, there should be a forward reference to paragraph 3.27 covering the special circumstances of projects in the Green Belt.</p> <p>Suggested Change: Line 9 ... Listed Building, or within a Conservation Area or Green Belt (see 3.27) regard</p>	Objection	Paragraph 3.27 of the SPD deals with Green Belt and visual amenity. Therefore the suggested change is not required.
58	Saddleworth Moors Action Group	744/RE/012/SPD	<p>Paragraph 3.18 - This should include AONBs in the list to cater for the possibility of any future designations.</p> <p>Suggested Change: Line 2 National Parks, Areas of Outstanding Natural Beauty, Sites of Special Scientific Interest.</p>	Objection	The SPD expands on the current Unitary Development Plan. There are currently no Areas of Outstanding Natural Beauty in the Borough therefore it is not appropriate to add in this reference. Any changes to designations will be considered in the preparation of the Local Development Framework.

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
59	Saddleworth Moors Action Group	744/RE/013/SPD	<p>Paragraph 3.19 - This should link landscape character to the reference to visual amenity.</p> <p>Suggested Change: Line 5 ... with respect to <u>landscape character and</u> visual amenity.</p>	Objection	<p>Amend sentence to be consistent with Policy NR3.1 (b):</p> <p>“...with respect to visual amenity, <i>including landscape character</i>, in each particular case.”</p>

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
60	Saddleworth Moors Action Group	744/RE/014/SPD	<p>Paragraph 3.21 - Text should include reference to cultural heritage.</p> <p>Suggested Change: Line 3 ... historical, <u>cultural heritage</u> or archaeological issues ...</p>	Objection	<p>The SPD expands on the adopted Unitary Development Plan Renewable Energy Policies. Reference is not made within the Renewable Energy Policies to cultural heritage and therefore it is not considered necessary to add this reference.</p> <p>However, the Unitary Development Plan must be looked at as a whole when development is proposed and therefore Chapter 12 (Conservation of the Historic Environment) is relevant.</p>

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61	Saddleworth Moors Action Group	744/RE/015/SPD	<p>Paragraph 3.24 - The first three sentences could be made to read better.</p> <p>Suggested Change: <u>The Peak District National Park was designated in 1951. Its planning function is administered by the National Park Authority with the following statutory purposes (as defined by the Environment Act, 1995):</u></p>	Objection	The wording of paragraph 3.24 has been taken from the Unitary Development Plan, which was adopted July 2006. The Peak District National Park Authority recommended the wording and therefore it is considered that the SPD should keep the same wording for consistency.
62	Saddleworth Moors Action Group	744/RE/016/SPD	<p>Paragraph 3.25 - No apostrophe in line 3</p> <p>Suggested Change: Delete apostrophe in 'it's'.</p>	N/A	Accepted.

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
63	Saddleworth Moors Action Group	744/RE/017/SPD	<p>Paragraph 3.26 - should include reference to land with public access.</p> <p>Line 3 - ... footpaths, and recreational routes <u>and land with public access</u></p>	Objection	Accepted.

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64	Saddleworth Moors Action Group	744/RE/018/SPD	<p>Paragraph 3.27 - The impression is given that all developments would have to demonstrate 'Very Special Circumstances'. This need only arise if they were to involve effects, which would be adverse to the landscape character, openness or visual amenity of the Green Belt.</p> <p>Suggested Change: Developments within <u>the</u> Green Belt <u>which would create adverse impacts on landscape character or visual amenity</u> would have to demonstrate Very Special Circumstances <u>to gain planning consent</u> and these should be set out...</p>	Objection.	<p>Amend last sentence to read:</p> <p><i>"Inappropriate developments within the Green Belt would have to demonstrate 'very special circumstances' to gain planning consent and these ..."</i></p>

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
65	Saddleworth Moors Action Group	744/RE/019/SPD	<p>POLICY NR3.2 – Wind Developments</p> <p>Landscape, through the Number, Scale, Size and Siting of Turbines, Impact on the Skyline, Cumulative Impact or the Need for New Power Lines for Connection to the Electricity Supply Grid.</p> <p>Title does not make sense. It should be re-worded and there should be a parallel reference to visual amenity as well as landscape.</p> <p>Suggested Change: <u>Impacts on Landscape, through the Number, Scale, Size and Siting of Turbines, Impact on the Skyline, Cumulative Impact or the Need for New Power Lines for Connection to the Electricity Supply Grid.</u></p>	Objection	The SPD expands on the Renewable Energy Policies in the Unitary Development Plan, which was adopted on 14 July 2006. The title is taken directly from Policy NR3.2 and therefore the wording from the policy cannot be amended following its adoption.

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
66	Saddleworth Moors Action Group	744/RE/020/SPD	<p>4.4 - The impacts of wind turbine projects can be extensive, it is important to indicate that some effects may occur beyond the Council's administrative boundary, and vice-versa.</p> <p>4.4 Add at end of paragraph: ... landscape involved, <u>and will have disproportionate impacts when seen on the skyline. Effects will not necessarily be confined to the area within the metropolitan Borough boundary. Similarly, projects within the areas of adjacent local planning authorities may have impacts within Oldham. Visual impacts on human 'receptors' will also vary according to the degree of visibility and the relevance</u></p>	Objection	<p>Add sentence to the end of paragraph 4.4:</p> <p><i>"It is also recognised that impacts may not be restricted to within the Borough."</i></p>

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
			<u>of any recreational activity to landscape and countryside issues.</u>		

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
67	Saddleworth Moors Action Group	744/RE/021/SPD	Paragraph 4.5 - The references are insufficient. In addition to the Guidelines for Landscape and Visual Impact Assessment (GLVIA) the Companion Guide to PPS22 also refers more specifically - at 5.24 - to guidance on cumulative effects published by Scottish Natural Heritage (Footnote 5 p62). The CG also refers – at 3.33 - to the Landscape Character Assessment Guidance for England and Scotland of 2002, which should be mentioned. It also contains Technical Annex 8 specifically dedicated to Wind power. Since the publication of the CG in 2005 SNH has produced detailed Good Practice Guidance for the Visual Representation of	Objection	<p>The SPD refers to the Companion Guide to PPS22, which contains reference to the Scottish Natural Heritage. It is not thought necessary to make reference in more detail to each of the suggested documents. However, it would be helpful to make more explicit reference to the Companion Guide so the following amendment will be made:</p> <p>Add sentence to paragraph 4.5 after second sentence:</p> <p><i>“This guidance also provides advice on assessing cumulative landscape impacts and visual effects between paragraphs 5.21 and 5.24. It states that cumulative visual effects concern the degree to which</i></p>

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
			<p>Windfarms in 2007 which is now the standard UK source and to which readers should be referred.</p> <p>Suggested change: Line 5 ... updated in 2002. <u>At 5.24 the Companion Guide also refers to guidance on cumulative effects published by Scottish Natural Heritage (footnote 5 p62)., and at 3.33 to the "Landscape Character Assessment Guidance for England and Scotland" (published by the Countryside Agency and SNH in 2002). In addition the Technical Annex 8 of the Companion Guide is specifically dedicated to wind power. SNH has since produced detailed</u></p>	Objection	<p><i>renewable energy development becomes a feature in particular views (or sequences of views), and the effect this has upon the people experiencing those views."</i></p>

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
			<p><u>“Good Practice Guidance for the Visual Representation of Windfarms” in 2007, which is applicable throughout the UK.</u></p>		

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
68	Saddleworth Moors Action Group	744/RE/022/SPD	<p>Paragraph 4.12 requires further text to refer to Conditions, which would require the removal of non-functioning turbines.</p> <p>Suggested changes: Redundant Turbines, Plant, Transmission Lines and Access Roads will be removed and the sites restored restored Line 3 ... Where appropriate, the Council will also impose planning Conditions to ensure the removal of non-functioning or defunct turbines or apparatus ... <u>Although applications for connection to the electricity distribution grid will be made under s37 of the 1989 Electricity Act, the Council require applicants to provide indicative details of the route and means of the</u></p>	Objection	<p>The sub title is taken from Policy NR3.2 in the Unitary Development Plan and therefore cannot be amended.</p> <p>Section 6 of the Council's adopted Statement of Community Involvement outlines that developers are encouraged to contact the Council before the submission of a major planning application to discuss the proposal and any issues that may arise from it. It also states that developers are encouraged to discuss their proposal with other specific consultation bodies, where appropriate, before submitting an application.</p> <p>It is not considered that the suggested change should be added.</p>

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
			<u>the connection as part of any planning application.</u>		

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
69	Saddleworth Moors Action Group	744/RE/023/SPD	<p>There is no text to explain the role of the Council as a consultee in relation to applications over 50MW installed capacity made under s36 of the 1989 Electricity Act.</p> <p>Insert new paragraph <u>4.13</u> <u>In the case of projects over 50MW installed capacity made under s36 of the 1989 Electricity Act the Council is a consultee with power to object to applications and force a Public Inquiry. As consent for such cases requires deemed planning consent the Council will apply identical criteria and public consultation processes before reaching its decision.</u></p>	Objection	The SPD expands on each criterion set out within the Renewable Energy Policies within the Unitary Development Plan. This section of the SPD specifically deals with the decommissioning of redundant turbines and therefore this comment is not relevant.

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
70	Saddleworth Moors Action Group	744/RE/024/SPD	<p>There is no text to guide applicants in making an assessment of CO₂, NO_x and SO_x abatement. Following DEFRA guidance this should be configured to current government parameters appropriate to each particular renewable technology on the assumption that a grid average of generating technologies would be displaced.</p> <p>Insert new paragraph <u>4.14</u> <u>Assessment of CO₂, NO_x and SO_x abatement should be configured to current government parameters appropriate to each particular renewable technology and calculated on the assumption that a grid average of generating technologies would be displaced.</u></p>	Objection	The reasoned justification to Policy NR3.2, paragraph 13.93 explains that the Council will expect applicants to outline the benefits arising from the development in terms of the energy produced in order to enable a balanced assessment of the proposal to be carried out. This is also reflected in Policy NR3.1. It is considered that the SPD sufficiently deals with this issue.

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
71	Saddleworth Moors Action Group	744/RE/025/SPD	At 13.92 - 93 the Reasoned Justification summarises procedure before a planning application is submitted. It mentions the need for EIA, and advises that in sub-EIA cases similar material should be compiled. It concludes that the SPD 'will provide full details of all the issues expected to be addressed in such a statement'. In view of the detail and complexity of the subject it is unrealistic to expect this SPD to do that, and as a result it is imperative that the references to more specific guidance as recommended above are incorporated in the SPD.	Objection	Paragraphs 4.4 to 4.12 of the SPD expand on Policy NR3.2 and set out what issues are expected to be covered in an environmental assessment. Paragraph 3.20 also expands on some of the issues, which may be covered in an Environmental Impact Assessment.

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
72	Saddleworth Moors Action Group	744/RE/026/SPD	<p>5 POLICY NR3.3 – RENEWABLE ENERGY IN MAJOR NEW DEVELOPMENTS</p> <p>This title is misleading at first reading and should be clarified by reference to Residential and Commercial development.</p> <p>Suggested change: 5 POLICY NR3.3 – RENEWABLE ENERGY IN MAJOR NEW <u>RESIDENTIAL AND COMMERCIAL</u> DEVELOPMENTS</p>	Objection	The wording of Policy NR3.3 is taken from the Unitary Development Plan, which was adopted in July 2006 and therefore cannot be amended.
Editorial Changes					
Editorial changes, such as spelling corrections and reference to new government guidance, will be made to the Supplementary Planning Document and its associated documents where necessary.					

Number	Individual/ Organisation	Reference Number	Summary of Representations	Support or Objection	Council's Response
		SPD: Paragraph 2.7	Editorial change		Add in after Planning Policy Statement (PPS) 1 "Delivering Sustainable Communities": <i>"with the Supplement to PPS1: Planning and Climate Change..."</i>
		Appendix 5: Useful Links	Editorial change		Remove the following website links: Department for Communities and Local Government; Renewable Northwest; and Sustainable North West; Department of Trade and Industry-Microgeneration site.

Appendix 6: Template to assist with Policy NR3.3 as Annex 3.3 d (see reference 727/RE/002/SPD)

Details of proposed scheme / development		
<i>SPD page reference/ Information source (Paragraph)</i>	1. Planning reference number (if known) or site name or site street address	
5.8 5.13	2. Brief description of development (for example number of residential units)	
Predicted energy consumption		
5.12, 5.13, 5.17 5.28	3. Site's annual predicted energy consumption (both electricity and gas) before inclusion of renewable technology. (Please state energy units used e.g. kW Hr/per year etc)	
5.16	4. Source of data (E.g. SAP/ SBEM)	
5.17	5. Reference or title of associated Energy Statement to support this summary sheet	

**Planning Process Checklist for Policy NR3.3
Instructions for use**

This voluntary sheet helps at a glance to capture information relating to Policy NR3.3, Renewable Energy in Major New Developments (see SPD Section 5.20 & 5.8). It can be included with the Energy Statement that is required as part of the SPD (see paragraph 5.20 in SPD) but it is not a replacement for the Energy Statement itself. Applicants may choose to incorporate this table within the Energy Statement.

Input is required where boxes are shaded grey. References to the SPD are indicated to help the user understand what information is required.

Figures and data included within the table should match the content within the Energy Statement.

<i>SPD page reference/ Information source</i>	Renewable Technology type	State number of individual installations or number of properties/ buildings to be served by the technology	System's overall rating (MW) (or state units)	Energy generated cumulatively per year (state units)	Contribution towards 10% on site renewable energy generation (percentage from site total in 3 above)
<i>Example only</i>	<i>Solar PV</i>	<i>50m2</i>	<i>0.004MWp</i>	<i>37,500kwh</i>	<i>(Predicted consumption) total 375,000kwh PA 10% contribution (37,500kwh)</i>

5.9 <i>Annex NR3.3A</i> <i>Annex NR3.3B</i>	Solar Thermal				
5.9 <i>Annex NR3.3A</i> <i>Annex NR3.3B</i>	Solar Photovoltaic Systems				
3.16, 3.17, 5.9 <i>Annex NR3.3A</i> <i>Annex NR3.3B</i>	Wind (Roof Mounted)				
3.16, 3.17, 3.20 <i>Section 4</i> 5.9 <i>Annex NR3.3A</i> <i>Annex NR3.3B</i>	Wind (Stand Alone Installations)				
5.9 <i>Annex NR3.3A</i> <i>Annex NR3.3B</i>	Biomass (heat)				
3.20, 5.9, 5.22, <i>Annex NR3.3A</i> <i>Annex NR3.3B</i>	Biomass (heat and Power CHP)				
5.9 <i>Annex NR3.3A</i> <i>Annex NR3.3B</i>	Heat Pumps				
5.9 <i>Annex NR3.3A</i> <i>Annex NR3.3B</i>	Ground Source Cooling				
5.24	Other				
	TOTALS				

