

APPENDIX F

OLDHAM REPLACEMENT UNITARY DEVELOPMENT PLAN

NOTES OF ROUND TABLE SESSION ON RENEWABLE ENERGY HELD ON 2 FEBRUARY 2005

ATTENDING:

George Arrowsmith Inspector - PINS

Richard Mordey Inspector - PINS

Sarah Barker Oldham MBC

Gareth Owen OMBC

Simon Robinson OMBC

Anthony Baker

David Chadderton Saddleworth Archaeological Trust (SAT)

Martin Eagland Saddleworth Parish Council (SPC)

Lionel Gregory

Michael Hopkins United Utilities Green Energy (UUGE)

Robert Whiteley UUGE

David Makin Saddleworth Civic Trust (SCT)

Michael Buckley SCT

Kenneth Hulme Saddleworth Moors Action Group (SMAG)

Alan Roughley SMAG

FORMAT OF NOTES

These are summary notes of the discussion and not a verbatim report. The session followed the agenda set out by the Inspectors. In view of the large numbers of proposed changes RM requested the Council to produce an up-to-date position statement which was summarised at the commencement of the RTS. Reference was made to the Oldham Borough Renewable Energy Study. RM indicated that he would consider any written representations which might be made regarding this document. Subsequently, the agenda as previously circulated was followed. Some early comments related more directly to the consideration of criteria and are referred to in that section of the notes.

RE-STATEMENT OF OBJECTORS' POSITIONS & SUBSEQUENT DISCUSSION

Although there was a degree of welcome for some of the changes, the basic positions of the majority remained the same. There was a fundamental objection to windfarms which, it was argued, despoil the landscape. They could also cause distraction for drivers. The Council was criticised for slavishly following Government policy, for hiding behind PPS22, and for an over-reliance on wind energy which had not been fully assessed whilst there was some support for nuclear energy. It was argued that the Energy White Paper takes a short-term view and the Government will take a pro-nuclear stance after the next election. There was scepticism of the potential of wind turbines and their economic benefits, and concern that the Council had not consulted the public effectively. An interested party had done much of the analysis. The Parish Council supported renewable energy but are concerned that Saddleworth may be asked to make a disproportionate contribution.

For its part the Council stated that the Government's position was clearly stated in the Energy White Paper & PPS22. It has a duty to implement national policy and must have good reason to depart from that policy. If it didn't the Plan or the policy could be called in. Whilst PPS22 is only a guideline it provides a framework for testing proposals. The Council had gone beyond its statutory obligations in terms of consultation. The Revised Deposit Stage was itself an exercise in public participation. Wind power has been identified as a clear, if contentious, resource.

The Areas of Search had been developed in response to GONW and have now been removed in accordance with Government Guidance as set out in PPS22. Regional Policy Guidance gives priority to reducing emissions and sets targets – 15% of energy requirements from renewables by 2005.

To the question, “Are the Council able to cope with changes in national policy?” the Council responded positively and stated that policies would be subject to continuous review through the new Local Development Process and there is a robust monitoring system.

It was submitted that the Council's Renewable Energy Study dismissed non-wind energy too readily. When it was alleged that the Study is not independent, the representative of UUGE pointed out that both national and regional guidance require the Council to undertake such studies which should be used to develop strategies. The

Council pointed out that the Study is part of a learning process whilst the RUDP is the Council's strategy.

References were made to Regional Planning Guidance. Concern was expressed that Regional Assemblies are not democratic. It was argued that there was a gap between the target of NW Energy and the Council. The Council had tabled an extract from the current partial review of Regional Planning Guidance. Table 8.4 shows a sub-regional target for Greater Manchester of 28MW of renewable energy. This is only a small proportion of the target for the North West Region as a whole. An objector pointed out that a typical wind turbine generates 2MW. The sub-regional target equates to only 14 turbines or one per Local Authority in Greater Manchester. In response, it was indicated that the RPG targets relate to all technologies and parts of Greater Manchester are clearly not suitable for wind energy. A simple averaging process was, therefore, not appropriate.

An objector referred to a current proposal for a 26-turbine wind farm in Rochdale MDC. The Council pointed out that the achievement of targets is not a reason for not considering applications for planning permission. Policy NR3.1 relates to a wide range of renewable energy, whilst NR3.2 was added to deal specifically with wind energy.

Information was sought regarding the reason for a threshold of 10 turbines in Policy NR3.3. The Council stated that this was to avoid an undue burden on developers particularly in areas of low property value. Small developers might not have the appropriate skills to meet energy requirements as set out in the policy. NR3.3 is a pioneering policy which the Council will keep under review.

The Parish Council wants the policy to seek clear proof of proposals being able to satisfy need. The Borough Council is intending to produce an SPG relating to renewable energy in 2006/2006. This would deal with details. It would derive from the RUDP and would go through a process of consultation. This would give it greater weight. It was suggested that the principle of testing could be dealt with in such a document.

TECHNOLOGY

On behalf of UUGE it was stated that there has been substantial research into wind energy and this is referred to in the Companion Guide to PPS22. There were differences of opinion regarding the likelihood of savings in CO2 and economic viability. The advantage of offshore turbines was acknowledged but they were not applicable to Oldham. The Council mentioned that the Energy White Paper recognises the need for further research and refers to fuel security, the need to renew energy and indicates that wind energy is part of a mix of energy sources.

CONSIDERATION OF CRITERIA

The Council had earlier confirmed that Policy NR3.2 was essentially a development control policy which would provide a framework for any applications which might be forthcoming. The RTS then proceeded to discuss various criteria.

Green Belts

There was concern at the possibility of wind farms being constructed within the Green Belt and that policies would not be sufficiently rigorous to prevent this. Objectors wished to know how “very special circumstances” are defined. In response, the Council pointed out that openness and visual amenity had been re-introduced into NR3.1 as criterion ‘g’, reflecting PPS22. It also pointed out that wider environmental and other benefits have also to be assessed. On behalf of UUGE it was stated that the RUDP already contains a Green Belt Policy and duplication should be avoided. PPS22 states that many elements of wind energy are inappropriate in the Green Belt whilst NR3.1 states that everything is inappropriate. This conflict could be avoided by removing reference to the Green Belt from the policy. There is no reference to the Green Belt at a local level in the Companion Guide. In any event assessment of the impact of a proposal on the Green Belt would be an integral element of any environmental assessment. Leaving aside criterion ‘g’, there is no reference in the body of NR3.1 for any benefits to be weighed as very special circumstances. The Council replied that it is being consistent in including reference to the Green Belt in that many of the criteria in NR3.1 duplicate other policies in the plan. It is also important to point to the references in PPS22 regarding wider economic and environmental benefits.

Landscape

There was similar concern at the likely impact on the landscape. Turbines change the landscape, they would be out of scale on the Saddleworth Moors, the blades move and make a noise, they would have a detrimental impact upon the peace and openness of the moors and their narrow valleys. The words “unavoidable damage” in NR3.1 imply that some damage would be acceptable. Policies cannot protect the landscape from wind turbines which are only accepted because they are supported by national policy. The Scottish Tourist Board has indicated that wind turbines have a negative impact upon tourism.

In favour, it was submitted that research on public attitudes has shown a majority favour wind turbines and that subjective views need to be balanced against benefits. For its part, the Council suggested that landscape evolves and that perceptions change once development has taken place. Criterion ‘b’ of NR3.1 provides adequate protection. This was countered by the submission that landscape evolution is a gradual process and turbine development does not equate with this. There was a suggestion there should be a policy which recognises the special landscape qualities of the Borough. The Council replied indicating that such a policy is being prepared. UUGE felt that many of the issues under discussion are covered by various criteria. The wording “no significant adverse impact” would be preferred to “unacceptable”.

Nature Conservation

The point was made that PPS22 allows development in designated nature conservation areas and there is no need for a blanket exclusion.

Archaeology

The addition to paragraph 13.76 to include archaeological sites was welcomed but SAT had a preference for this protection to be applied to all sites. The presence of remains of various types is accepted but the Council indicated that the Greater Manchester archaeologist would prefer to proceed on a case-by-case basis.

Buffer Zones

It was the opinion of most objectors present that buffer zones should be defined with specific guidelines as is the case with some other authorities. There was a need for a barrier around protected sites, footpaths and bridleways. There now appears to be no onus on an applicant to demonstrate that proposed development is in a safe location. The effect of low frequency noise should be taken into account. Buffer zones have a relationship with road safety. The flicker effect of blades can distract drivers. Icing can cause structures to fall. In the case of Denshaw, about half of the population live outside the main built up area of the village. There should be a buffer zone around all isolated properties.

It was pointed out on behalf of UUGE that generally buffer zones do not take into account location and factors relating to specific proposals. Guidance recommends that proposals should be assessed individually. Buffer zones appropriate for one type of development may not be relevant to others.

The Council indicated that buffer zones had been included in the First Deposit Draft but were integral to the Areas of Search. There is now a criterion relating to health and safety. NR3.2 does not differentiate between different scales of development and buffer zones might not be appropriate for smaller sites. The proposed SPG will give further guidance. Emerging information is a further reason for not being too specific about separation and other criteria. Road safety is a standard consideration in determining planning applications. PPS22 states that Planning Authorities should not create buffer zones around internationally or nationally designated areas and local development documents should not include policies in relation to separation distances from roads.

Concluding Remarks

UUGE submitted that NR3.2 requirement concerning EIA's went beyond the legislative position. It was pointed out in response to an objector's suggestion that the height of masts should be a criterion that regulations specify when they are appropriate.

RM in closing pointed out that there was much detailed objection regarding wording which it was not appropriate to discuss at the RTS. He reminded the parties that they could make further written submissions and any written representations would be given the same weight as submissions made at appearances.