

## APPENDIX 2: SUMMARY OF CONSULTATION RESPONSES

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This appendix provides a summary of the key issues raised at the two North Yorkshire sustainable energy workshops which were held on the 23<sup>rd</sup> June and 14<sup>th</sup> July at County Hall, Northallerton. A summary is also provided of the responses received in relation to the consultation on the Draft North Yorkshire Sustainable Energy Planning Guidance and the Draft Energy Action Plan Guidance.

### WORKSHOP COMMENTS

The table below provides an outline of the workshop programme:

<b>Review of District Renewable Energy Targets</b>
1. Presentation: <ul style="list-style-type: none"><li>• NEF review of district renewable energy targets</li><li>• What can renewable heat provide?</li><li>• What can the National Parks/AONBs contribute?</li></ul>
2. Questions and plenary discussion
3. Discussion of key issues in breakout groups
4. Feedback from groups
5. Final summary and discussion
<b>Development of Sustainable Energy Planning Guidance</b>
1. Presentation: <ul style="list-style-type: none"><li>• Context for renewable energy development in North Yorkshire</li><li>• Development of the planning guidance: emerging key issues</li></ul>
2. Discussion of consultation questions outlined in Section 2 and 3 of the briefing paper
3. Presentation:
4. Emerging findings of landscape sensitivity study
5. Discussion of consultation questions outlined in Section 4 of the briefing paper
6. Closing summary and the next steps

The comments made at the workshops have been grouped under the broad questions that were posed in the briefing papers which were circulated to the workshop participants prior to the events.

## ***Will local planning authorities be willing to adopt the indicative district potentials as targets in their Local Development Documents?***

### ***Policy***

- RSS will determine whether the targets go into LDFs. If RSS includes them, it will be more likely that will be adopted in LDFs.
- The inclusion of targets is unlikely as criteria based policies should determine how much should be delivered by each district.
- If all LPAs adopt targets, some areas with fewer constraints may feel they have to take more, e.g. Selby.
- Some local authorities already have supportive policies in their Local Plans.
- There is a discrepancy between the national picture and the need for action and very low local targets.

### ***Public Opinion***

- The lack of public participation in defining targets could cause opposition. Public participation will directly influence the council's decisions on adopting targets.
- Problem with targets is that they can have a negative image – people feel that targets are being pushed on to them.
- Difficulty in adopting targets is that people need to accept that there will be turbines visible in some areas in the landscape and that will require a change of perception.

### ***General***

- There is a concern that the National Parks won't be able to contribute much towards the targets.
- There is a need to stress that if LPAs don't develop renewable energy, then they will need worse alternatives.
- Monitoring of targets is a key problem, e.g. property owners can decide to install embedded energy/do thing under permitted development. Difficult to track this form of development.
- Targets provide a level playing field across the region.
- Targets will need to be exceeded to meet at climate change.
- The targets must be treated as minimums.
- There is uncertainty over what targets mean and how they can be achieved.

## ***What type of wind energy development is likely to be most appropriate within North Yorkshire i.e. single/clusters or larger windfarm developments?***

### ***Single/Cluster Windfarm Developments***

- There is concern over the cumulative impact of numerous schemes in areas. Prefer single and small clusters.
- Some recent public consultation has found that there is more support for single turbines, with high potential for schemes associated with settlements.
- Some districts are heavily constrained by radar issues – therefore large windfarms are not possible.
- There is potential for single turbines as part of renaissance initiatives e.g. Selby.
- There is real potential for community windfarms.
- York CC are hoping to achieve small installation within sight of the city walls
- Use Swaffham as good example of development acceptable to communities; it fits in with a relationship to towns/others settlements.

### ***Large Windfarm Developments***

- There should be potential for larger windfarms adjacent to industrial areas.
- Concern that the targets won't be met if we just go for one or two turbines

### **Public Opinion**

- There is a problem of unfamiliarity with turbines.
- Need an open public discussion rather than fighting it through the courts.
- Need renewables to become acceptable as part of street scene.
- Once one or two turbines have been installed in a district there will get better debate on whether they want more.
- Need to get away from seeing turbines as ugly – can be attractive in their own right. At M8 Art Strategy – proposal for windfarm in colours.
- There are question as to whether turbines will affect the openness of greenbelt.

### **What is the general attitude to wind/large scale biomass developments within the County?**

#### **Support**

- More support likely for local turbines, especially if linked to local electricity needs and price.
- Easier to take on board energy conservation.
- If focused on local community schemes and local ownership there would be fewer problems. Larger scale schemes which have more opposition.
- General support for biomass.
- Some local authorities have had local opposition from action groups but some support in wider area.

#### **Opposition**

- Opposition due to fear of alien features intruding in the landscape and lack of understanding of renewable energy.
- Politicians don't always represent community views and afraid of bringing support, therefore perceived local opposition.

#### **Require More Public Participation/Consultation**

- Views of a few small vocal groups are known but many local authorities haven't done wider consultation.
- Need to do more consultation.
- Need more community involvement – role for LA21 officers.

#### **General**

- North Yorks being expected to provide more of fair share and metropolitan areas should do more.
- Problem of poor leadership at national and international level – influences local views.

### **Do you agree with the use of the energy hierarchy as the guiding principle for the planning guidance?**

- **Reducing need** – this can be done through district councils and it is enforceable.
- **Energy efficiency** – this may be difficult to enforce through planning system.
- **Supply from renewable resources** – this can be achieved.
- **Clean technology** – this would be more difficult to achieve.
- Energy hierarchy is useful to raise awareness.
- Use building regulations as a minimum standard.

***Do you agree with that developers should be required to include a specific % of renewable energy generation in new industrial, commercial and housing development above a certain size? If so, what size of development should require the inclusion of renewables and what percentage of renewable energy generation should they be asked to supply?***

### **Agree**

- General agreement that a percentage target should be included.
- Yes felt should incorporate renewables but debate as to what size threshold.
- Use standards through building regulations.
- Need lower thresholds in North Yorks, as often small or single developments.

### **Guidance Required**

- Information in guidance needed on:
  - monitoring of renewable energy generation/targets,
  - establishing thresholds,
  - viability for developers, and
  - examples of policies requiring inclusion of renewables in new development.
- There is also a need for guidance on listed buildings.

***Do you agree with the suggested planning policy criteria set out in the Planning Briefing Paper?***

### **Key Issues Raised**

- Suggested that additional criteria should be added relating to:
  - Aviation safety.
  - Ancillary works, i.e. grid connection (justification).
  - Cumulative impacts
  - Access and highway issues.
  - On balancing environmental against economic and social impacts
- Request for examples of case law.

***Should a definition of what constitutes a small scale development within the context of nationally designated area be included in the planning guidance? If so, what size of wind energy development is deemed to be acceptable?***

### **Suggested Sizes**

- Yorkshire Dales National Park includes a definition of small scale development within their development plan – 25m maximum height – taken from Lake District National Park and Cumbrian CSP research.
- 100m (small scale in planning terms).
- Cumbria defined in size – 30m/three turbines. Needs to be practical.
- Set upper limit for “small scale”.
- Scale shouldn’t relate to MW/not related to landscape issues except regarding cumulative issue.
- Define what is not ‘small scale’ i.e. out of character, or use, e.g. 10MW to provide flexibility in order to meet that cover.
- If can accommodate visually should be happy to have.
- Inform through case studies.
- List of which size is considered small scale and helpful without understanding the site.
- Scale relative to landscape.
- Provide info about how to define ‘small scale’ developments, but not actually define it.

### **Policy**

- Industry view – not actively providing scheme in National Parks, but encourages niche developers to target these areas. Basing a policy in research elsewhere doesn't sit with evidence based approach.
- Some designated area plan for tight policies, in knowledge that some might get eroded.
- Include local benefit as a criterion.
- Small scale development is encouraged more positively.
- AONBs – no current policy.
- Should have criteria and tight policies, but local benefit to community important.
- Dales encourage domestic and community development within accepted guidelines.
- Discount domestic scale turbines.

### **Local Level**

- Should be for LPA to consider at more detailed scale.
- Small scale definitions need to relate to landscape scale/type/character directly – developers will need to answer this question because will vary from place to place.
- Details should be in district plans, not in guidance.
- Up to DC to make decision and on site specific issues.

### **General**

- Climate change is changing landscape already.
- Sustainability issue and protecting landscapes for children.
- There should be no definition.
- Define local benefit – employment, economic etc.

### **What implementation measures should be addressed by the guidance?**

#### **Planning Obligations:**

- Community benefit from RE development – In terms of planning gain. This might not be possible because of reputation, unless it is a community lead scheme. This should determine whether a scheme is either acceptable or not. Planning gain should not be considered in monetary terms.
- Incorporating renewable energy (RE) information after development -
  - This should be pushed strongly and linked to energy efficiency. There is a need to define the type and size of development, e.g. low cost housing. Government and housing corporations should require this for all affordable housing or all housing.
  - Looking for mitigation of environmental impacts.
  - Need to remember that RE is clean energy and is much better than the alternative.
  - The benefits of RE need to be stressed.
  - Thresholds should be low, e.g. single turbines, because not much development takes place so GP in National Parks. Need to capture it all.
  - Is planning the best system to deliver this given asking for any other contributions from developers?
  - Would building control be better? E.g. require heat pumps.
  - Designated landscapes also have less scope for PV.

### **General**

- How to incorporate, e.g. PV into NR areas – advice on this would be helpful as part of guidance.
- Permitted development rights
  - Feels there is scope to sign up to some common parameters across North Yorks.
  - Don't need SPD.

- Site Selection
  - Difference between countywide study and EIA on site basis and need to identify alterations.
  - So LPAs might want to look more closely at providing guidance, eg if generally low sensitivity – need to do this before get to site level and during retrospectively.
  - EIA – notes/guidance on scoping.

### **Landscape sensitivity assessment – What are the preliminary views on the assessment that has been undertaken?**

#### **Wind**

- Size of turbine appropriate is proportional/dependent on scale of the landscape – ratio (indefinable?).
- The scale of the landscape of a character area is variable.
- Need to advise developers to look at scale of landscape.
- Point out trends towards increase in turbine size.
- Height of mature trees is a benchmark ~20m.
- Small scale *turbine* not equal to small scale *development*.
- Gap between regional sensitivity/capacity studies and site selection studies.
- Concern expressed that all North Yorks is high sensitivity.
- Concerned about subjective nature of such a study.
- Some disagreement on fundamentals, eg Wales – large numbers of turbines in small valleys.
- Maps need to only cover the area of North Yorkshire and not beyond the County boundary.
- Ecology and other issues also important but not covered in this study.
- BST wind speedmill attract commercial developers first despite high landscape sensitivity.
- More acceptable in/next to cities/industrial areas.
- Felt that it would be better to build two/three turbines in a location as opposed to just one.
- One of most important questions – are we trying to preserve landscape as a museum?
- Need to acknowledge in guidance that small scale can work too.

#### **Hydro**

- Surprised at how few sites identified because lots of old mills around.
- Not expensive to develop existing sites.
- Architectural quality/design very important and will affect commercial liability.
- Cumulative impact might be difficult to assess.
- Other cumulative effects regarding flooding/river networks
- Scope for hydro with reservoirs across western side of the county, e.g. Scarhouse.
- Potential for mains pressure hot water.
- Discuss design/architectural issues with regards to hydro schemes
- Discuss potential for hydro schemes in reservoirs
- Assess 40 sites as identified in the AEAT study, but provide guidelines on how to assess suitability of other proposals that come up

#### **Biomass**

- North York Moors is one of most wooded area – eg Dalby Forest – put plenty here and think about related impacts. Scale of building needs some thought – most likely 100m x 30 x 10 may not be accurate and need to be able to visualise, eg Ely Power Station.
- Need to acknowledge role of small-scale biomass buildings close to fuel sources.
- Also need to acknowledge the distance for transport to feed biomass station.
- FC has maps to show suitability of forest crops.
- Suggest biomass in forested areas where close to woods (fuel).
- Discuss *small scale* biomass and potential for screening by trees.
- Point out issues related to crops and access in biomass guidelines.

## CONSULTATION RESPONSES

The comments made by consultees in relation to the Draft North Yorkshire Sustainable Energy Planning Guidance and the Draft Energy Action Plan Guidance documents are set out below.

Organisation	Summary of response
CHP Association	Planning Guidance: <b>1.3/2.6</b> Mention CHP target at start.
	<b>1.17</b> Refer to PPS1 para 22 which relates to reducing the use of resources.
	<b>3.8</b> Mention technologies under energy hierarchy levels
	<b>3.19</b> Refer to EU Directive on Energy Performance of Buildings
	<b>3.39 / Table 3.2</b> Give guidance on how the various technologies might be integrated
	<b>3.64</b> Agree with view on carbon basis not energy basis
	<b>3.104 / Box 3.15</b> Refer to EU Directive on Energy Performance of Buildings
	<b>4.22</b> CHP is sustainable energy infrastructure, re-word sentence.
	<b>5.91 / 5.147</b> Heat density of buildings more important for smaller scale biomass than a grid point
<b>GIS</b> Heat density maps should be included on GIS point (details of where to get them provided).	
Craven District Council	Planning Guidance: <b>Table 2.2</b> An explanation of where 75MW likely to come from?
	<b>3.93</b> Potential SPAs and candidate SACs are also to be viewed as designated sites in terms of PPS9.
	<b>4.7</b> Add reference to use of conditions.
	Also range of minor typo and grammatical points for both documents.
Landscape comments (NYCC Landscape Officers)	Guidance should be included on whether there is any planning power to influence the location of biomass crops.
	<b>5.72</b> Clarify what transitional means.
	<b>5.116</b> Forest of Bowland should be covered.
	Range of minor comments on maps and tables – presentational and technical.
Energie Kontor	An analysis of responses and comments on these should be provided.
	Concerned that there will be insufficient time between 23 <sup>rd</sup> September and 7 <sup>th</sup> October to consider the consultation responses.
	Unsure that comments made at the workshops have been taken on board.
	There should be time for people to comment on the final drafts before they are finished.
	As the documents will form part of the LDD evidence base the information must be robust but there are inaccuracies.
	<u>Planning Guidance:</u> <b>2.13</b> – text on targets does not match the tables 2.2 and 2.3.
	<b>3.60</b> – assumptions about lack of impact of micro generation/onsite generation on economics of residential and commercial development – where has this assumption come from?
	<u>Energy Action Plan Guidance:</u> - Concern over lack of testing of assumptions.
	- A full technical appendix is needed for the economic data.
	- A baseline of what has come from on site generation so far would be useful, and should consider that by the time policies are in force how much will that produce by 2010?
	- The treatment of all woodland as a potential resource for biomass is very simplistic and not realistic, and a full technical appendix is needed.
	- Need to conclude whether the AEAT figures are too high / too low / OK.

Organisation	Summary of response
Scarborough Borough Council	Whilst the landscape assessment identifies sensitivity based upon what is there at the moment this does not take any account of any plans / policies for that area which wind energy development may be contrary to.
	What conclusions should be drawn from all of the different constraints?
	Nature Conservation Designations plan – SAC and SPA designations should be shown in full to give a proper context.
CPRE (Hambleton District Branch)	Use of renewable energy will not defeat energy poverty
	Energy Hierarchy – A and B are essentially the same. Point D rules out the source of power which has been the cleanest in the UK for the last 30 years.
	The policy aim of providing a safe consistent supply of energy at affordable cost is not taken into account.
	The relative inefficiency of renewables will be passed on through costs to the consumer.
	<b>Table 21 / page 30</b> The figures for Hambleton fail to consider the impact of the airfields at Linton on Ouse, Dishforth, Topcliffe, Leeming Bar and Teesside Airport, and the smaller airports at Bagby and Sutton Bank.
	Siting of wind turbines must also consider ground conditions. Draining marshland (loss of peat) results in a loss of carbon sequestration which outweighs the carbon reduction measures.
	Wind maps have been omitted.
	<b>Table 25 / page 33</b> Is it ten tonnes per annum per hectare? References to where this figure has come from should be included.
	<b>Page 80 table</b> CO2 comparisons can't be made because energy quantities are different.
	CO2 emissions from renewables are not zero.
Countryside Agency	<b>5.80</b> Nidderdale AONB should be included in other areas of particular sensitivity.
	<b>5.84</b> Further reference should be made to impact upon public footpaths and areas of moor, heath and down as open to the public following the CROW Act 2000.
	<b>5.11.6</b> and throughout the document. Heritage Coast should be referred to as a sensitive environment.
	Environmental and landscape improvements should be incorporated into any renewable energy developments.
	<b>Page 78</b> local landscape designations are being discouraged under PPS7 in favour of local landscape assessments and perhaps it would be better for this approach to be supported.
	Is there opportunity for deep hole heat?
British Wind Energy Association	The documents are too long and a summary document should be provided.
	Concerned that there will be insufficient time between 23 <sup>rd</sup> September and 7 <sup>th</sup> October to consider the consultation responses.
	An analysis of responses and comments on these should be provided.
	If the document is to form part of the evidence base for the preparation of LDDs it will need to be robust and sufficiently detailed.
	<b>2.13</b> Clarify this paragraph.
	The renewable energy targets appear very low.
	<b>Box 2.4</b> Highlight those schemes which have been approved but are not yet operational.

Organisation	Summary of response
	<p><b>Table 2.5</b> BWEA welcomes recognition of sustainable energy benefits.</p> <p><b>3.9</b> Supports not applying a sequential approach to the energy hierarchy.</p> <p><b>3.1</b> Planning considerations for sustainable energy in buildings should highlight micro wind turbines in the energy supply section.</p> <p><b>3.37</b> Details of key issues that need to be considered by local authorities is welcomed.</p> <p><b>3.82</b> Emphasise that landscape character assessment must be used in conjunction with criteria based policies.</p> <p><b>5.34</b> Tip heights are now often greater than 100m. Correct or add a new section to reflect how higher turbines should be dealt with.</p> <p><b>5.89</b> Planning policy cannot be used to guide development to particular areas or cluster it in specific parts of the landscape, policies should enable applications to be considered on a case-by-case basis.</p> <p>Welcomes the limitations of use of the landscape study highlighted in the text.</p> <p><b>4.3.1</b> Text states target is 350MW but table 6 states total 2021 target as 361MW.</p> <p><b>4.3.3</b> A full technical appendix should be attached to show evidence to justify the microgeneration projections.</p> <p><b>4.4</b> The text is unnecessarily negative on developing renewable energy in National Parks.</p> <p><b>4.51</b> Justify why the calculated number of turbines is that (i.e. because of the predicted MW of a turbine).</p>
Hambleton District Council	<p>Technical constraints are not mentioned in the Energy Action Plan Guidance.</p> <p>Last 2 sentences of paragraph 3.90 need correcting.</p> <p>Box 3.8 needs correcting</p> <p>1.19 Should be published as either SPD by NYCC or needs to be published as planning guidance with all LAs signing up to it.</p>
Harrogate Borough Council	<p>Designation of an AONB is of value yet LUC assessment is of quality and condition. But Nidderdale AONB also reflects its quality as some areas were not included because they were poorer quality.</p> <p>Page 12 What designation information was used and were area of sensitivity adjusted as a result? This could result in an inconsistent study.</p> <p>Small scale as defined in the study would not be appropriate in the AONB (small scale as 1-5 100m turbines).</p> <p>Developers will be given an initial impression that any area of medium sensitivity would be readily able to accept windfarm development.</p> <p>The study should acknowledge that in reality there may be no appropriate site for renewable energy in any given typology. Summary sheets should say 'may or may not'. Confusion may arise over the word 'potential' or 'limited potential'.</p> <p>The study needs to emphasise that the range of landscape sensitivities are comparable within North Yorkshire only and not to areas outside the sub-region.</p> <p>Seems to be a cross between a sensitivity and capacity study. It maps sensitivity but refers to the suitability of an area to accept them in the typology sheets. Does Fig 5.2 represent high to low irrespective of scale.</p> <p>Do the average scores still reflect the initial approach of separate scores within a typology? If so the findings may be based on an inconsistent approach.</p> <p>No reference is made to the Harrogate District Landscape Assessment adopted as SPG in 2004.</p> <p>There can be no direct link between sensitivity and capacity, and this should be referred to in the text that describes the sensitivity assessment.</p> <p>Agree that there should not be a summary sheet for typology areas.</p>
Councillor Trevelyan	<p>1.15 Local level is preferable.</p>

Organisation	Summary of response
(Ryedale)	2.24 Reference should be made to a conservation hierarchy which recognises that conservation should take account of need (i.e more weight would be given to the visual impact of a satellite dish on a house than a solar panel)
	3.53 / 3.60 Developers should be 'required' to show they have addressed sustainability issues.
	3.53 Difficult to reduce CO2 as there is nothing to reduce it from.
	3.83 Planning for biomass should include a complete environmental footprint including displaced food growing and transport impacts.
	Landscape impacts of crop growing should not be underestimated.
	An impact hierarchy is also needed.
	3.14 Conflicts could arise over 'expressing general support' through 'not in my back yard' approaches to actual applications. The word 'any' adds weight to this and the word 'appropriate' is vague.
	4.2ii Environmental negative impacts may be local but with wider benefits for the environment – further clarification is needed on the scale of the impact assessment.
	4.12 Suggests prioritising looks over needs – renewable energy should not be in the same category as satellite dishes.
	5.15 'Detrimental' is prejudicial, the landscape assessment gives weight to the appearance of the landscape but more weight should be given to the need for energy. A conservation hierarchy is needed.
	5.73 Forested areas such as Dalby and Cropton Forests where power plant could be hidden have been omitted for biomass.
	5.78 Windfarms should be visible as they need to be in the path of wind.
	5.93 / 5.94 Cumulative effects of willow coppice will be considerable.
	North York Moors National Park
	<u>Energy Action Plan:</u>
	Needs to be clear that the targets are for electricity generation.
	There is a great potential for hydro in the sub-region.
	Where will energy crops come from, how many hectares and what are the landscape issues associated with this?
	Assuming PV will be on new buildings, how long will it take for all buildings to have PV?
	Need to emphasise more of the benefits of micro and heat technologies such as utilising skills and developing new skills, creating local investment, using local energy for local needs, safeguarding against price rises, empowering local people to take responsibility for the future of their community.
	Renewable energy needs to be integrated into existing buildings.
	Reducing carbon emissions through using alternative fuels needs to be addressed.
	Existing and proposed developments ( <b>box 2.4</b> ) – can contact details be added?
	More positive wording than 'should' or 'could' should be used.
	It is difficult to specify what constitutes a small scale wind development as it depends on the local situation and landscape.
	Needs to be clear that as the North York Moors are identified as sensitive to wind development that this does not mean small scale wind and biomass are not acceptable.
Richmondshire District Council	The landscape assessment appears largely desk based with no evidence of reality checking.
	The study does not take account of current local plan policies and non-statutory designations for areas which are vulnerable to new development.
	Concern over the landscape assessment for lower Wensleydale.

Organisation	Summary of response
REVOLT	The consultation period is too short – documents only received on 12 September.
	Agrees with the CPRE comments.
	The document promotes climate change as being certain and focuses on prevention rather than adaptation.
	Are NEF objectives to promote Government policy rather than to assess issues impartially?
	Instead of preventing climate change, the approach should be to resist the increasing human contribution and mitigate against effects.
	The rationale behind the AEAT studies arriving at such a high windfarm concentration is not presented as requested.
	<b>Page 5</b> ‘identify and align with national energy policy’ suggests it is being prescriptive.
	<b>Page 16</b> $R_2 = 0.0629$ is a poor correlation.
	It is meaningless to ignore oil and coal in domestic energy efficiency.
	Domestic energy efficiency should be rated in fuel consumption in generation, transmission and distribution, not just energy consumed in the home.
	<b>5.6</b> Widening public understanding of renewable energy and landscape sensitivity is surely promotion not consultation? The exercise seems impositional.
	<b>5.47</b> The powerlines element has been omitted.
	<b>5.69 / Fig 5.2 / 5.81</b> The importance of the rural quality and tranquil nature of residential settlements should raise sensitivity to wind farms.
	<b>Page 77</b> on character of the built environment could be strengthened to reflect the above.
CPRE additional comments	<b>Hydro site 17</b> River Ouse, not Nayburn. River is subject to flash flooding.
	<b>Hydro site 27</b> Weir is probably used to control water in times of flooding, and the mill building is in serious structural decline.
	<b>Hydro site 34</b> River floods frequently, The viaduct is thought to be listed.
	<b>Hydro site 35</b> Real potential for hydro on this site. There are substantial corn mill buildings on the south.
	<b>Hydro site 26</b> Stamford Bridge has heavy flooding at times.
	<u>Landscape Assessment:</u>
	<b>Page 25</b> Wolds Valley is narrow and should be highly sensitive.
Nidderdale AONB	<b>Page 29</b> Strongly disagree – Caulkeys Bank is very visible and highly sensitive.
	<b>2.26</b> Add the potential of PV, CHP, hydro and other technologies.
	<b>4.5.1 (EAP)</b> Add reference to AONBs too. Both AONBs are investing £75000 in renewable energy demonstration projects in the 2005/6 financial year.
	<p><b>Landscape guidance</b></p> <p>Concerned that the approach has resulted in certain areas of the AONB being defined as medium sensitivity. Sensitivity analysis is likely to be used in future to guide searches for appropriate sites and be used in Public Inquiries. There is an urgent need for a more sophisticated capacity study that takes proper account of landscape value.</p> <p><b>5.77</b> Object to this as a pristine state is an abstract concept and if this is used as a starting point for sensitivity analysis which would conclude that a significant adverse impact would result in wild and open landscapes. The most cherished landscapes are those associated with traditional agriculture and this should be the benchmark against which change is judged. This approach could explain why areas of the AONB have been defined as medium sensitivity. The characteristics are extremely vulnerable to the sort of change identified as potentially acceptable.</p> <p>Transitional features do not necessarily detract from landscape features. Its sensitivity and integrity as part of the AONB are not compromised by this.</p> <p>The study should therefore be regarded as an interim report which can be used to</p>

Organisation	Summary of response
	inform a more detailed and comprehensive spatial analysis to produce a more useful set of guidelines.
GOYH (Les Saunders)	<p><b>Planning Guidance</b> An executive summary is needed for each document of the key recommendations, maybe highlighting information from the blue boxes.</p> <p>Make it clear what the conclusions are on the AEAT 2004 suggested figures.</p> <p>If views in the AEAT pen pictures for each local authority are agreed with these should be referred to.</p> <p>Chapter 2 needs to make greater distinction between 'renewables for electricity' and 'renewables for heat', although renewable heat needs to be supported too.</p> <p>Need to emphasise that landscape sensitivity assessment only applies to that aspect, any proposal will need to be considered against far more than just this.</p> <p>Title – 'Delivering Sustainable Energy in North Yorkshire' Recommended planning guidance from LUC. Produced for a Partnership of North Yorkshire Local Authorities October 2005.</p> <p><b>1.9-1.10</b> Summary outputs from the workshop should be placed in an appendix. Also ensure the appendix has something from every local authority even if this is 'no comment'.</p> <p><b>1.12</b> Amend to reflect that you will be presenting your completed work on October 7<sup>th</sup>.</p> <p><b>1.13 – 1.19</b> This could be relocated into the next steps / recommendations part.</p> <p><b>2.13</b> Needs to be reworded to reflect the potential highlighted in the AEAT 2004 report and the targets in current RSS. And refer to both tables as potentials, not targets.</p> <p><b>2.20</b> Clarify whether this just refers to electricity.</p> <p><b>Table 2.4</b> If possible could this table be converted to MW to align with targets.</p> <p><b>Table 2.5</b> Need to make it clear that this list encompasses all form of sustainable energy.</p> <p><b>2.26</b> Not sure what size is small scale biomass? This should be promoted across the sub-region not just in National Parks and AONBs. Refer to integration of Solar/PV/GSHP in all major urban areas not just Selby and York. GSHP not an urban thing at present.</p> <p><b>3.9</b> Should an energy hierarchy be picked up in the RSS as a concept?</p> <p><b>3.18 / 3.21</b> Should this say 'at least very good'</p> <p><b>3.34</b> Refer to Calderdale's work here as a Merton example in the Region.</p> <p><b>3.60</b> Is solar thermal SWH or PV? What about adding the cost of any other renewable heat or electricity? Caveat the last sentence.</p> <p><b>3.80</b> Make this stronger. If LA targets are in the RSS they will have to be included so maybe address this issue now.</p> <p><b>3.82</b> Chapter 5 fulfils a valuable role for developers in indicating where there are major concerns. Need to qualify last sentence which reads as though landscape sensitivity will be the only determinant.</p> <p><b>3.89</b> Is there any view on whether this is a reasonable limit?</p> <p><b>3.90</b> Is industry comfortable with a height rather than turbine capacity limit, is this outside PPS22 territory?</p> <p><b>3.92</b> Should Knabs Ridge appeal decision be added to the appendix?</p> <p><b>5.10</b> National and Regional policy should be added to list of factors to influence decisions.</p> <p><b>5.35</b> Can you clarify that this size is for 1MW. Can you include any indicator of the size of a small scale biomass plant.</p>

Organisation	Summary of response
	<p><b>5.91 - 5.94</b> Refer to wood fuel heating for public buildings booklet on the GOYH website.</p>
	<p><b>5.65</b> Results of the appraisal and the key issues could be a separate chapter from the process of the landscape sensitivity work.</p>
	<p><b>5.129</b> This deals with concerns over impacts on AONBs where these have been highlighted as medium sensitivity.</p>
<p>GOYH (Les Saunders)</p>	<p><u>Energy Action Plan Guidance</u></p>
	<p><b>Section 1 and 2</b> Sentence at the beginning should say what this is delivering and why we have it. Need to make it clear why we need EAPs. Make it clear how SPG and EAP documents fit together.</p>
	<p><b>Section 4 / Table 2</b> It would be helpful if an approx MW could be added.</p>
	<p><b>4.3.1</b> Reword to accurately reflect the AEAT figures. Amendments to other associated text after tables 5 and 6 in this respect.</p>
	<p><b>4.3.2.</b> Make clear that the 2002 and 2004 assessments did not begin with an assessment of what each district consumes.</p>
	<p><b>4.3.3</b> Make clear which parts relate to electricity and which to heat. Make it clear where your assumptions differ from AEAT, and what these assumptions were. Indicate that these are potentials and what Las need to do to make it happen.</p>
	<p><b>After table 21</b> Is it possible to indicate a ball park figure for the RE electricity opportunities identified?</p>
	<p><b>4.5.1</b> This section should give more steer on numbers and relative pictures for each district. Conclusions should match with those in SPG. Conclusions on technical aspects of AEAT work and view on no reason to change these should be given here, and also if technology mixes are broadly acceptable. Reference should be made to the AEAT district pen pictures.</p>
	<p><b>Section 5</b> Can reference and quotes of Calderdale UDP be included?</p>