

**Neighbouring Authority Consultation and Proposed Response:  
Waveney District Council - Renewable Energy and Sustainable Construction  
Draft Supplementary Planning Document (SPD)**  
Report by Planning Policy Officer

<b>Summary:</b>	The report briefly summarises the SPD and proposes Broad Authority comments.
<b>Recommendation:</b>	That the Planning Committee consider the officer comments and agrees that these are submitted to Waveney District Council as the formal response of the Broads Authority.

## **1 Introduction**

- 1.1 A Supplementary Planning Document (SPD) provides guidance to assist with the implementation of planning policies. It is a material consideration when making a decision on a planning application. Whilst they are not examined by an Inspector, a supplementary planning document is still subject to a process of consultation and engagement with relevant parties.
- 1.2 After this stage of public consultation is completed, officers will consider responses received and consider if changes need to be made. The document then proceeds to the LDF working group and then to full council for adoption.

## **2 The Waveney District Council's Renewable Energy and Sustainable Construction Draft SPD.**

- 2.1 This document contains information about how to make existing and new buildings more energy and water efficient, renewable and low carbon energy generation, mechanisms to reduce the potential for flooding, waste recycling, transport and ways which development can conserve and enhance wildlife and biodiversity.
- 2.2 This SPD covers the following sections:
- (i) **Delivering Low Carbon and Renewable Energy.** Discusses renewable energy generating technologies of commercial and domestic scales and issues that should be considered to fulfill the requirements of adopted policy.
  - (ii) **Sustainable Construction.** Clarifies how new buildings can achieve higher environmental standards and comply with adopted policy. Much of

the information in this section is equally applicable to both new and existing buildings.

- (iii) **Carbon Emissions and Carbon Compliance.** Encourages developers to increase the energy efficiency of new buildings and elaborates on information set out in 'Sustainable Construction'.
- (iv) **Lowestoft Lake Lothing & Outer Harbour Area Action Plan.** Specifically relates to future development within the AAP Area. The standards to be achieved are higher than those set out for the rest of the District.
- (v) **Planning Application Requirements.** This section should be read in conjunction with all other parts of the document by those who intend to submit a planning application. This section builds upon information provided earlier in the SPD.
- (vi) **Implementation and Monitoring.** Sets out how the Council will monitor policies related to Renewable Energy and Sustainable Construction. This will enable the Council to identify the effectiveness of the policies and if they need to be reviewed to assist with delivering the objectives set out in the Core Strategy.

### **3 Relevance to the Broads Executive Area**

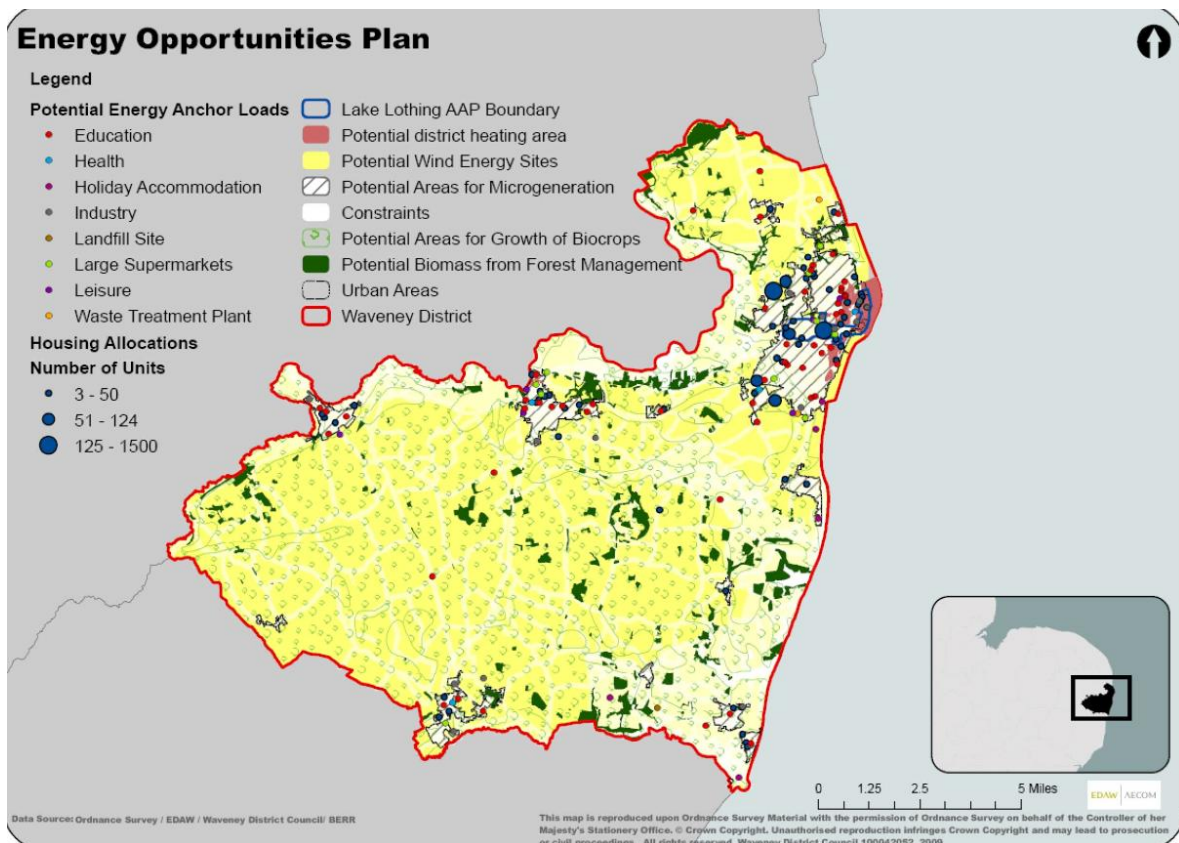
- 3.1 The guidance covers the whole of the administrative area of Waveney District, except that part lying within the Broads Executive Area. This area is covered by planning policies set out in the adopted Broads Authority Core Strategy and Development Management Policies documents.
- 3.2 Renewable Energy infrastructure and ancillary and transmission infrastructure can have impacts on biodiversity and landscape character and the Broads Executive Area is renowned for its biodiversity and landscape character. With Waveney District bordering the Broads Authority Executive Area, it is important that the Broads Authority is familiar with the content of the SPD and take advantage of this consultation to make comments on the SPD.

### **4 Summary of Proposed Comments.**

- 4.1 Overall, the SPD seems to balance the interests of and give reference to the Broads Executive Area fairly. There are some comments which are recommended to be made on the SPD, set out below:

#### General Comments

- Pleased to see reference to the Broads own landscape sensitivity study. It would be helpful to flag this study again within the later section which refer to LCA work.
- Page 8. The energy opportunities map is an area of concern as Waveney DC has included the Broads area within this map. The graphics are unclear as the Broads Executive Area plus the boundary should be highlighted as a constraint. It is recommended that there should be a map which indicates the Waveney DC planning boundary to add clarity.



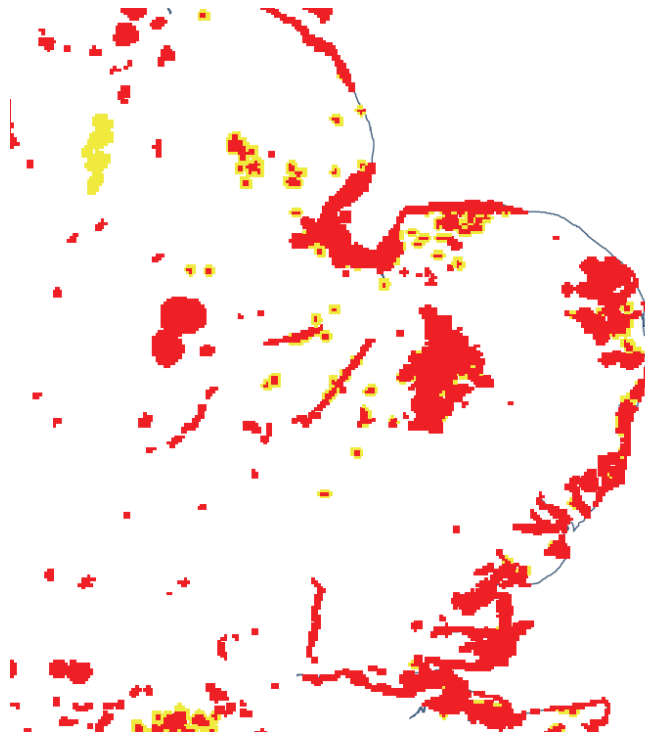
- The map seems to highlight that there are biomass opportunities for the alder carr woodland on the southern side of the valley. Some areas of alder carr woodland have high value and change is unlikely to be desirable. The Broads Biodiversity Action Plan could usefully be referenced in the SPD (page 28 covers woodland). The map above is not clear; however on page 28 of the Biodiversity Action Plan<sup>1</sup>, the map seems to show a different extent of woodland to the south of the river Waveney than the map above. Clarification on this would be welcomed.
- There is biomass potential of some areas of reedbeds, if these areas are managed with conservation in mind. Indeed Suffolk Wildlife Trust are working with DECC to look into the use of biomass from wet woodland<sup>2</sup>. There is also a report (October 2010) produced for the Broads Authority on New Opportunities For The Sustainable Management Of Fens: Reed Pelleting, Composting And The Productive Use Of Fen Harvests<sup>3</sup>. Both of these references may have relevance to the SPD.
- There are many and varied species and habitats in the Broads Executive Area. On the issue of birds in particular, we would like to refer you to the report produced by the RSPB in 2009: Mapped and written guidance in relation to birds and onshore wind energy development in England. The summary map below

<sup>1</sup> <http://www.broads-authority.gov.uk/broads/live/managing/broads-biodiversity-action-plan/BiodiversityActionPlanframeworkdocument.pdf>

<sup>2</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/48555/6277-decc-wetland-biomass-to-bioenergy-scheme-competit.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/48555/6277-decc-wetland-biomass-to-bioenergy-scheme-competit.pdf)

<sup>3</sup> [http://www.broads-authority.gov.uk/broads/live/authority/publications/conservation-publications/New Opportunities For The Sustainable Management Of Fens Reed Pelleting Composting And The Productive Use Of Fen Harvests.pdf](http://www.broads-authority.gov.uk/broads/live/authority/publications/conservation-publications/New%20Opportunities%20For%20The%20Sustainable%20Management%20Of%20Fens%20Reed%20Pelleting%20Composting%20And%20The%20Productive%20Use%20Of%20Fen%20Harvests.pdf)

shows areas with high sensitivity in red. The extract below is zoomed in to the East Anglia area. There is certainly a hot spot around the Broads area. This study could be of relevance to the SPD.



- The Broads Authority would welcome discussions, as appropriate, on renewable energy and ancillary and transmission infrastructure proposals at an early stage if they are near to the Broads Executive Area or have the potential to impact upon the Broads Executive Area.

#### Detailed Comments

- Suggest that energy transmission and ancillary infrastructure and the potential impact it can have on the landscape and biodiversity is another constraint that could be mentioned on page 12 and 13.
- Biomass considerations: section 2.39. Local fuel source is preferable to reduce carbon emissions associated with lengthy journeys as well as benefit local economy.
- District heating and CHP considerations: section 2.45. Depending on location, landscape impact is another consideration.
- Large-scale photovoltaics. Section 2.50 – reference to local landscape sensitivity: not just within Waveney, but nearby, namely the Broads. Considerations: section 2.52 -Potential to benefit biodiversity. Natural England's Technical Note TIN101 (dated September 2011) could be of interest.
- Energy from waste considerations; section 2.56. Landscape impact is another one that could be added.
- Wind turbines considerations; section 2.60. Suggest split up landscape and environment as environment section lost in text. The Broads also supports a diverse variety of birds and bats and there are European Designations in the area namely the Broadland SPA.

- Page 32. Ancillary infrastructure is lost in this section and seems an add on, whereas this has potential to have great impact on the Broads and its setting. Suggest its own section to give more prominence.
- Pg 62 para 3.54. Topographical error: draught not draft. Bullet three suggest text: 'operation and **only where appropriate** making alterations'.
- Para 3.55 – suggest 'secondary glazing **Should** be considered'.
- All maps could usefully add the Broads Executive Area.

## 5 Links of relevance

- 5.1 The Renewable Energy and Sustainable Construction SPD can be found here:  
[http://consult.waveney.gov.uk/consult.ti/Renewable\\_Energy\\_SPD\\_May\\_2013/consultationHome](http://consult.waveney.gov.uk/consult.ti/Renewable_Energy_SPD_May_2013/consultationHome)
- 5.2 More information on SPDs can be found here:  
<http://www.pas.gov.uk/pas/core/page.do?pagelid=469626>

## 6 Financial Implications

- 6.1 There are no obvious financial implications other than officer time related to consultations from Waveney DC on proposals affecting the Broads Authority.

## 7 Conclusion

- 7.1 The Draft SPD produced by Waveney DC is generally supported. In general, it refers adequately to the Broads Authority, some of the Authority's background studies and the potential impacts on the Broads Authority Executive Area. The topics covered by the SPD are important and seem to be presented in a user friendly format. There are some comments which it is proposed to be submitted to Waveney DC which cover issues that are relevant to the Broads Executive Area. The main issues relate to landscape setting, opportunities for the use of reedbeds and biodiversity.

Background papers: None

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Appendices: None