



# **NORTH WESSEX DOWNS AONB POSITION STATEMENT**

## **RENEWABLE ENERGY**



**October 2012**

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### **Position Statement Status**

The purpose behind this Position Statement is to inform local planning authorities, landowners, applicants and other interested parties regarding the provision of new renewable energy projects within, or likely to affect, the North Wessex Downs AONB or its setting. This document is intended to guide policy makers, to assist in the preparation of planning applications and to assist in the decision making process. The Position Statement has been prepared in consultation with and approved by the North Wessex Downs AONB Management Working Group and the Council of Partners including all the constituent Local Authorities. This guidance forms an extension of the principles laid out within the North Wessex Downs AONB Management Plan (2009-2014). The Position Statement provides the North Wessex Downs AONB view on a variety of forms of Renewable Energy proposals based on existing planning policy. The Position Statement was first approved on 13<sup>th</sup> March 2012 by the North Wessex Downs AONB Council of Partners, however following the publication of the National Planning Policy Framework (NPPF) on March 27<sup>th</sup> 2012 this Position Statement has been amended accordingly.

The primary purpose of AONB designation is to conserve and enhance the natural beauty of the area, as confirmed by Section 82 of the *Countryside and Rights of Way Act 2000* (CRoW Act). Within Section 85 of the CRoW Act 2000 there is a duty on all relevant authorities to have regard to this purpose in exercising or performing any functions in relation to, or so as to affect land in AONBs. This includes potential developments outside the AONBs that might, affect the natural beauty (including visual amenity and tranquility) of the AONB or its setting (see Setting Position Statement October 2012).

### **Introduction**

1. The North Wessex Downs AONB recognises in the first place that substantial benefits can come from seeking greater energy efficiency. Examples of this may include reducing the need to travel, improvements to the insulation of existing residential and commercial buildings, using energy efficient appliances and lighting. The North Wessex Downs AONB therefore acknowledges that seeking renewable energy is not in itself sufficient, significant work also needs to be undertaken to conserve and use energy as efficiently as possible. Some such works, such as reducing external lighting and reducing highway lighting, may also benefit the AONB through protection of the dark night skies.
2. The North Wessex Downs AONB also recognises the need for renewable energy projects to reduce our reliance on fossil fuels. However, not all forms of renewable energy projects may be suitable within or in the setting of this protected landscape. Hence the production of this Position Statement to identify opportunities whilst also highlighting constraints to different forms and scales of renewable energy generation.
3. Increased development of renewable energy resources is vital to facilitating the delivery of

the Government's commitments on both climate change and renewable energy. Renewable energy developments can contribute to the Government's sustainable development strategy including recognising everyone's needs for energy; effective protection of the environment - by reductions in emissions of greenhouse gases, thereby reducing the potential for the environment to be affected by climate change; prudent use of natural resources - by reducing the nation's reliance on ever-diminishing supplies of fossil fuels; and maintenance of high and stable levels of economic growth and employment - through the creation of jobs directly related to renewable energy development and also in the development of new technologies. The *Climate Change Act (2008)* has set a legally binding target of at least an 80 percent cut in greenhouse gas emissions by 2050 and a reduction of at least 34 percent by 2020.

### **The National Planning Policy Framework**

4. The NPPF highlights and explains the three dimensions to sustainable development as being economic, social and environmental. These three dimensions then give rise to the need for the planning system to perform a similar number of roles – an economic role, a social role and an environmental role.

Although the NPPF promotes at paragraph 14 for the first time “*a presumption in favour of sustainable development*” it then goes on to highlight the position for plan makers in areas where this policy may be “*restricted.*” Specifically footnote (9) has been added to the NPPF which highlights AONBs as such an area where restrictions may apply to the above presumption. The NPPF also recommends that local authorities:

*“identify and protect areas of tranquility which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.”*

Paragraph 97 states that to help increase the use and supply of renewable and low carbon energy, local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources. Specifically they should:

- *have a positive strategy to promote energy from renewable and low carbon sources;*
- *design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts;*
- *consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources;*
- *support community-led initiatives for renewable and low carbon energy, including developments outside such areas being taken forward through neighbourhood planning; and*
- *identify opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.*

Paragraph 98 goes on to say: When determining planning applications, local planning authorities should:

- *not require applicants for energy development to demonstrate the overall need for renewable or low carbon energy and also recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and*
- *approve the application if its impacts are (or can be made) acceptable.*  
*Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should also expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.”*

5. Of note within the NPPF there is a cross reference to the National Policy Statement for Renewable Energy Infrastructure (EN-3) which states at paragraph 2.5.33 in relation to national designations:

*“In sites with nationally recognised designations (Sites of Special Scientific Interest, National Nature Reserves, National Parks, the Broads, Areas of Outstanding Natural Beauty and Registered Parks and Gardens), consent for renewable energy projects should only be granted where it can be demonstrated that the objectives of designation of the area will not be compromised by the development, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the environmental, social and economic benefits.”*

6. Within the NPPF itself at paragraph 115 it is noted that:

*“Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.”*

7. The NPPF continues at paragraph 116 stating that :

*“Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest.”*

### **North Wessex Downs AONB and its setting**

8. The North Wessex Downs AONB is one of the most expansive, open and relatively remote AONBs in the south of England. Its natural beauty largely emerges from the characteristic open downland landscapes, with long views of beautiful landscapes, with little visual or noise disturbance. As such, The North Wessex Downs AONB is particularly sensitive to developments that are visually prominent, of an urban, suburban or industrial nature or are noisy. The following paragraphs cover specific forms of renewable energy schemes and their appropriateness within the North Wessex Downs AONB and its setting (see also Setting Position Statement October 2012).

### **Wind Turbines**

9. In 2006 the North Wessex Downs AONB published guidance on the Sensitivities and Constraints to Wind Turbine Development within the AONB. This confirmed that all areas of the AONB were moderately to highly constrained in terms of accommodating wind turbine development above 25m in height without causing real harm to the character and qualities of the AONB. Even below 25m there is still risk that in many exposed locations wind turbines would not be compatible with the purposes of designation, i.e. conserving

and enhancing the natural beauty of the AONB.

10. In respect of all wind turbines above 25m in height, the North Wessex Downs AONB recommends that alternative forms of energy generation should be considered first, given that all of the landscape types within the AONB are sensitive to a significant degree to wind turbine development (see *North Wessex Downs AONB - A Study of Landscape Sensitivities and Constraints to Wind Turbine Development 2006*). It is considered by the North Wessex Downs AONB that this approach is consistent with the NPPF, that a consent for renewable energy projects should only be granted where it can be demonstrated that the objectives of designation of the area will not be compromised by the development, as stated above. The North Wessex Downs AONB, on the basis of the above report, therefore has a presumption against wind energy developments in the AONB at and above 25m in height and in locations outside the AONB where they would affect its setting (including public enjoyment of the landscape).
11. Additionally, wind turbine development below 25m in height (unless very well located, for example a single turbine in a less exposed location and screened in some way) may also be considered unacceptable. There may also be issues over cumulative harm if more than one wind turbine is proposed even if below 25m, as this may also change the character of an area, particularly if noted for its open, undeveloped and tranquil character.
12. In all cases exposed hillside, open vale, open valley and open downland areas are the least likely landscapes where development of this nature could be accommodated without causing real harm to the AONB.
13. In respect of proposals for wind turbines outside the North Wessex Downs AONB but within its setting, the North Wessex Downs AONB has published a Position Statement on Setting to assist in the consideration of this form of development.

#### **Solar / Photovoltaics (Microgeneration)**

14. The North Wessex Downs AONB supports solar and photovoltaic (PV) provision at a local microgeneration scale. Proposals for installations within Conservation Areas, on Listed Buildings or within the World Heritage Site of Avebury should always seek guidance from local authorities as this form of microgeneration may be constrained on heritage grounds.

#### **Solar / PV Farms**

15. Subject to the location of panels on top or to the side of existing buildings, large well-designed solar arrays on buildings are unlikely to be objected to by the North Wessex Downs AONB unit. There are many large farm buildings, in particular, within the AONB where panels could be placed with little or no negative impact on the AONB. It is however recommended that “frameless” style PV panels are used to create a continuous dark surface across existing roof surfaces. Some PV panels come with a silver frame which can result in a “checkerboard” effect of panels across a roof surface, which are visually more prominent, particularly where they are not aligned correctly.
16. If a more substantial free standing proposal were to come forward (above 1 hectare in area) the AONB considers paragraph 116 of the NPPF as being relevant as this would be considered to be major development. The NPPF at paragraph 116 states (as noted above) that planning permission should be refused for major developments in designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. If schemes above 1 ha are forthcoming on the basis of exceptional circumstances then the North Wessex Downs AONB will use a criteria based approach,

considering firstly why such a major project needs to be located within the AONB. If sufficient reason is given as to why a site within the AONB has to be developed for PV then sites on or around existing buildings and previously developed land should be considered first as stated above.

17. Once other options have been explored and if greenfield sites are to be considered then this should be on a criteria-led basis. These criteria include:

- that solar / PV farms should not result in the loss of the best agricultural land (Grades 1,2 3a) or land of ecological value;
- that sites are visually very well contained by hedgerows and trees;
- that no new access or power cables need to be constructed above ground to serve the site and that equipment and fencing on the site is also well designed, sympathetic to the setting and screened;
- that existing contours are used without the need for site levelling;
- that consent is given on a temporary basis of 25 years so the equipment can be removed if no longer required (if the land has been restored to grassland then subsequent reversion back to arable should be discouraged);
- that measures are taken within the site to improve ecology in line with local BAP/LNP objectives; consideration given to grazing options, agricultural production and sward management of land between and around the PV arrays; to improve boundary landscaping where required in accordance with the AONB Management Plan and agree suitable management of the land e.g. through grazing; and
- a clear commitment to community gain, this may come in the form of free or discounted energy to a local public building where applicable, so the local AONB community can also benefit from the proposal (as is already offered by some PV providers in line with Government guidance).

18. As wind turbines may be exposed and harmful in the landscape so too could solar /PV farms in the wrong location. Therefore hillside, open vale, open valley and open downland areas are the landscapes where it is least likely development of this nature could be accommodated without causing real harm to the AONB. However, solar / PV farms do have the advantage of not requiring any great height and therefore there may be more concealed locations within the North Wessex Downs AONB, particularly in between existing blocks of woodland or between large farm buildings, where development could take place with only very limited and localised landscape impact. Any applications for large scale solar/PV farms will need to be supported by a Landscape and Visual Impact Assessment (as part of an Environmental Impact Assessment) including appropriate mitigation measures.

### **Ground Source / Air Source Heat Pumps (Microgeneration)**

19. The North Wessex Downs AONB broadly supports this form of alternative energy provision as the equipment is usually well concealed within a building or buried, although particular care should always be taken in respect of Listed Buildings and historic environments.

### **Wood Fuel**

20. The North Wessex Downs AONB, including working in partnership with the North Wessex Downs LEADER Programme, positively supports the growing wood fuels market whether wood chip or logs. The AONB also supports increased provision from locally-sourced sustainable timber rather than reliance on imports, particularly in relation to wood pellets. There is however a need for caution to protect existing character areas, like open downland, from character change from substantial new tree planting if proposed. The

impact of planting for wood fuel on water resources needs careful consideration. However, suitable management of existing woodland and carefully considered new tree planting in areas where woodland is already a landscape feature should be encouraged. The first priority should be for the sustainable management of existing woodland. New planting proposals for wood fuel should first demonstrate why the alternative of management of existing woodland has been discounted in favour of new planting.. Preference in all cases should be given to locally characteristic species, and to the visual effects of planting patterns and shapes (avoiding, for example, stripey effects or layouts unrelated to local landscape structure). Potentially new buildings may be needed to process or dry harvested wood. The siting, scale, design, colours and materials of any new buildings should always be carefully considered in the context of conserving and enhancing the character of the AONB.

### **Other Biofuels**

21. There is potential from other grown crops like straw or rape seed. The wider merits or otherwise of using conventional arable crops to produce fuel rather than food is not a matter for the AONB. Therefore, where no significant damage to landscape quality or character results from it, the AONB is unlikely to offer any objection. Additional cultivation of valuable sites, including for example permanent grassland (especially chalk grassland), common land, SSSIs and other sites of nature conservation importance and land encompassing or close to Scheduled Monuments, should however be avoided. In all cases where new crops are being introduced, the North Wessex Downs AONB supports risk assessment and contact with the AONB unit to fully consider the potential for undesirable landscape and character change from introducing new crops, together with other environmental considerations. In certain circumstances scoping may need to be undertaken as to the need for an Environmental Impact Assessment (see 2011 EIA Regulations).

### **Anaerobic Digesters & Biomass**

22. This form of alternative energy production may result in the need for new buildings and storage facilities and the potential for increased traffic flows. The AONB is more likely to be supportive if a proposed operation is of a modest scale, uses an existing site and existing buildings where possible, and uses locally sourced material. A modest scheme may be one that is easily contained within an existing farm yard setting and operates without the need to import material from off the farm in question.
23. Particular issues that will need consideration include potential harm through visual intrusion, noise, activity, odour, associated traffic movements, or associated infrastructure such as overhead lines. Large new buildings and structures on greenfield sites within the AONB or within its setting, importing large quantities of material from outside the immediate area on a significant scale, will not be supported in line with NPPF guidance in relation to major development within nationally protected areas.

### **Hydro-electric Generation**

24. It is accepted that large scale hydro-electric projects are likely to be very limited within the North Wessex Downs AONB simply due to geographical and environmental restrictions. However, small scale projects will be looked at positively on a case by case basis. The North Wessex Downs AONB partnership has positively supported through SDF funding feasibility work on a hydro-electric project at Goring and Streatley, and continues to assess the potential for other micro-generation projects in the area. Factors likely to result in support of hydro projects include whether:

- (i) equipment can be placed within existing buildings or on existing structures that are not scheduled for removal;
- (ii) they can use the existing head of water from existing impoundments without affecting the existing flow;
- (iii) their effect, both individually and cumulatively, on fish populations and other river life is acceptable; and
- (iv) they can, in the view of the competent agencies, operate without prejudicing progress towards achieving ecological objectives under the Water Framework Directive.

### **Waste to Energy**

25. Government advice is clear that major development should not take place in AONBs except in exceptional circumstances (NPPF paragraph 116). A landscape designated for its national importance is not considered a suitable location for this form of development. Most waste to heat proposals are likely to be on a scale to be considered to be major development. The North Wessex Downs AONB is aware of this form of development outside the AONB and considers that other similar sites outside the AONB should be considered first. This form of development has the potential to raise significant issues in terms of impact on the AONB both in terms of landscape harm, but also in terms of loss of character through traffic generation and the erosion of the rural road network, together with light, noise, water and air pollution among many other possible issues. This form of renewable energy development, which is another form of waste disposal, is therefore opposed in principle in the North Wessex Downs AONB.