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Campaign to Protect  
Rural England  
Standing up for your countryside

# The countryside generation game

## The effect of changes in planning for renewable energy one year on



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## Foreword by Shaun Spiers CPRE's Chief Executive

**T**he planning system deals in complexity, mediating between different interests – long-term versus short-term, for instance, or local versus national or even global – and seeks to find solutions in the overall national interest. Renewable energy poses particularly difficult challenges for the planning system, and for CPRE as a charity that is devoted to protecting the English landscape while also taking a broader view of the environmental challenges we face.

We support renewable energy, but not at the price of unacceptable harm to the countryside. In the words of Professor Susan Owens: “Climate is indeed a crucial issue, but...we miss the point if it becomes a warrant for other environmental harms.”<sup>1</sup>

A year ago the Government made changes to planning policy on renewable energy. The aim was to help ensure a better balance between local concerns, such as protection of landscape and amenity, and tackling climate change. The Government recognised that the National Planning Policy Framework (NPPF) was not delivering the right outcomes. This report considers whether the approach we have now is working better and whether more needs to be done.

The evidence indicates that the Government's changes have made a difference, and we applaud it for taking action. But we also question whether the system is currently too reliant on direct Ministerial intervention in planning decisions. We fear this is unsustainable and creates uncertainty for communities, developers and investors.

We need a more-robust planning system that addresses remaining flaws. It should be made clearer in the NPPF that the need for renewable energy does not automatically override local environmental protections and the legitimate concerns of communities. We also need a strategic plan-led approach to developing energy infrastructure, particularly across planning boundaries, and more attention given to dealing with cumulative impacts, especially from multiple technologies. We are heartened by the Government's focus on developing solar electricity projects on commercial rooftops, but it must address significant barriers if these aspirations are to be met. We also wish to see more support for solar associated with new housing and commercial buildings.

I hope politicians of all parties, both local and national, read this report and make the necessary adjustments to policy. There are positive signs that politicians are grasping the

complex issues involved – both nationally and locally. But we must view this as only a job half-done if we are to continue to protect our precious countryside for generations to come.

In 2026, CPRE's centenary, our vision is that England's countryside makes a significant contribution to reducing greenhouse gas emissions and aiding climate change adaptation. Rural buildings are more energy efficient. Small-scale renewables are common, helped by effective local energy distribution. By this time there has been a large growth in green energy, but importantly decisions on energy developments of all kinds take full account of landscape character. This report aims to make a contribution to achieving this vision.

Shaun Spiers  
Chief Executive, CPRE



### A VIEW FROM ANDREW MOTION, CPRE'S PRESIDENT

**“IT'S OBVIOUS TO EVERYONE THAT WE NEED TO FIND SOURCES OF CLEAN ENERGY—AND SHOULD BE OBVIOUS THAT WE ALSO NEED TO REDUCE THE DEMAND FOR ENERGY OVERALL, AND TO MAKE GREATER EFFICIENCIES EVERYWHERE. BUT NONE OF US WANT TO SEE THE MEANS OF ESTABLISHING SUCH THINGS BECOME A BLIGHT THEMSELVES.”**

SPEECH AT CPRE'S AGM, JUNE 2012

<sup>1</sup> CPRE's 20:26 Vision – What future for our countryside: <http://www.cpre.org.uk/resources/cpre/about-cpre/item/2028-20-26-vision-what-future-for-the-countryside>



## Executive summary

**T**he Campaign to Protect Rural England (CPRE) strongly believes in a locally accountable planning system. It should be a vital tool to protect and enhance rural and urban areas, while accommodating the renewable energy infrastructure needed to decarbonise our energy system and tackle climate change. But the last few years has seen a number of cases where the planning system has delivered new infrastructure at unacceptable cost to other important environmental objectives, such as protecting valued landscapes and heritage. The Government has made several policy changes to address this, including new planning guidance for renewable energy issued in July 2013. This report draws on a wide range of evidence – such as planning appeal decisions, case studies from CPRE’s branches, and Local Plan policies – to determine what difference this has made.

Our analysis of the evidence indicates the Government’s changes to, and interventions in, the renewable energy planning system since summer 2013 have clearly reduced the proportion of solar farm and onshore wind projects receiving planning approval. This has helped reduce the associated landscape impacts and other local effects. However, our analysis also suggests that the jury is still out on whether the planning policy changes have achieved a better long-term balance between local environmental

protection and producing low-carbon energy, or whether Ministerial interventions are creating this impression. It is difficult to separate the effect of the planning changes from these significant and direct interventions in planning decisions.

We need a robust planning system that properly controls renewable energy development, taking account of landscape and other impacts. Some believe that subsidy changes proposed by the Government and the Conservatives are partly a response to a growing number of wind and solar proposals in sensitive locations but, if that is the case, it denies the proper role of planning. The overall effect of the Government’s changes is an approach that is unpredictable in its outcomes. This can often be the case where the planning process is subject to Ministerial intervention. The overall effect is unhelpful and confusing for communities, developers and investors.

From the analysis set out in this report, CPRE concludes that:

- There continues to be an absence of a strategic, plan-led approach to developing renewable energy infrastructure, locally and across planning boundaries, directing it to locations where local environmental effects are minimised;
- Clear guidance for planners and decision makers on how to address cumulative impacts from energy infrastructure is also lacking;
- Local Plan coverage remains incomplete across the country and, in areas that have the highest levels of renewable energy capacity, either installed or in the planning pipeline, it is even more patchy;
- It would make sense to use brownfield land unsuitable for housing for solar farms in preference to greenfield sites, and the subsidy regime should be used to encourage this;
- It is positive that the Government wants to stimulate a significant expansion of solar electricity on commercial rooftops through Feed-in Tariff subsidies and revising permitted development levels. However, there remain major barriers hampering extensive use of commercial roofspace for solar electricity, including the complexity of commercial building ownership and leasing, and the approach to building valuations.



## Recommendations

To address the key issues we have identified, CPRE calls for:

- The Government to provide more certainty by amending the National Planning Policy Framework to reinforce Ministers' intentions that the need for renewable energy does not automatically override local environmental protections and the planning concerns of communities;
- The Government and local planning authorities (LPAs) to work together to ensure effective strategic, local and cross-boundary planning for renewable energy. This could take a number of forms, depending on what would best suit particular areas. LPAs should use landscape character and capacity assessments to inform the approach to planning renewable energy. They should also develop a clear sense of the scale of infrastructure required;
- The Government to ensure clear and robust practical guidelines are developed for LPAs and Planning Inspectors on assessing and minimising cumulative impacts of energy infrastructure – including from multiple technologies or types of infrastructure;
- LPAs to ensure comprehensive renewable energy policies are an integral part of Local Plans, informed by local landscape character assessments, to direct developments to the most appropriate places and minimise local impacts;
- The Government to ensure that its subsidy regime encourages use of suitable brownfield sites for appropriately sited and well-designed solar farms. For example, by enhancing subsidies for using brownfield areas unsuitable for housing and/or subsidising solar farms of a larger size if they are on brownfield rather than greenfield sites;
- The Government to do more to address the full range of barriers to commercial rooftop electricity to maximise opportunities for the sector, such as giving owners and landlords greater incentives to support solar electricity, and ensuring surveyors' valuations give proper regard to the benefits of solar electricity;
- LPAs to support solar electricity on new buildings by requiring it through planning conditions where feasible;
- In the longer term, the Government to develop an approach that better reconciles the planning system for renewables with the subsidy system. For example, exploring ways in which spatial considerations can be reflected in subsidies – such as reflecting the relative capacities of different landscapes to accommodate infrastructure, and whether a site is on brownfield or greenfield land. In the case of solar electricity, subsidies could be enhanced for integrating this with new buildings so it does not need to be retrofitted, which would help to support innovation and be more cost-effective.



CPRE supports greater use of commercial roofs to produce solar electricity, like the Bentley factory in Crewe

# Introduction

## Climate change and energy use

The Campaign to Protect Rural England (CPRE) considers climate change to be one of the most complex and urgent environmental issues we face. It poses a major threat to our countryside. We support the UK's targets to reduce greenhouse gas emissions by 80% by 2050 and source 15% of our energy from renewable sources by 2020. The Government's latest figures show that 4.1% of our energy consumption in 2012 came from renewable sources, up from 3.8% in 2011. However, all energy infrastructure can have a harmful effect on the local environment. Ambitious and effective policies to increase energy efficiency and reduce demand should be the highest priority as this can reduce the need for new infrastructure, as well as reduce emissions. This urgent need to reduce energy consumption has not been given sufficient priority under the Coalition Government or previous administrations.

CPRE strongly believes in a locally accountable planning system as an important tool to protect and enhance rural and urban areas, while accommodating the renewable energy infrastructure we need to decarbonise our energy system. But in the last few years there have been a number of examples where the planning system has delivered new infrastructure at unacceptable cost to other important environmental objectives such as protecting valued landscapes, heritage assets and local amenity. In 2012, CPRE published a report highlighting these issues for onshore wind developments and recommending changes to address them<sup>2</sup>. This report sets out our view on the progress that has been made in responding to these recommendations.

## Recent policy changes

Following pressure from MPs, mainly Conservative backbenchers, the Government accepted that the right balance was often not being struck between meeting the need for low-carbon energy and avoiding damaging local environmental impacts. The Secretary of State for Communities and Local Government and his Energy and Climate Change counterpart both published statements to this effect<sup>3</sup>. This was followed by several policy changes to address the problem, including new planning guidance for renewable energy issued in July 2013<sup>4</sup>. In addition, pre-application consultation with local communities was made compulsory for more-significant onshore wind applications from December 2013. The July 2013 guidance has now been superseded by, and embraced in, online planning guidance<sup>5</sup>.

This report looks at progress one year on from the June 2013 Ministerial Statements and July 2013 planning guidance. It examines the evidence to determine whether the Government's changes have helped the right renewable energy projects be approved in the most appropriate locations more often. It considers how effective Local Plan policies have been at supporting well-sited infrastructure and how effectively brownfield sites are being used for solar energy. It also sets out recommendations for changes that are still needed. The report focuses on onshore wind and solar farms as they can have the greatest impacts on the countryside due to their size and frequent location in rural areas.

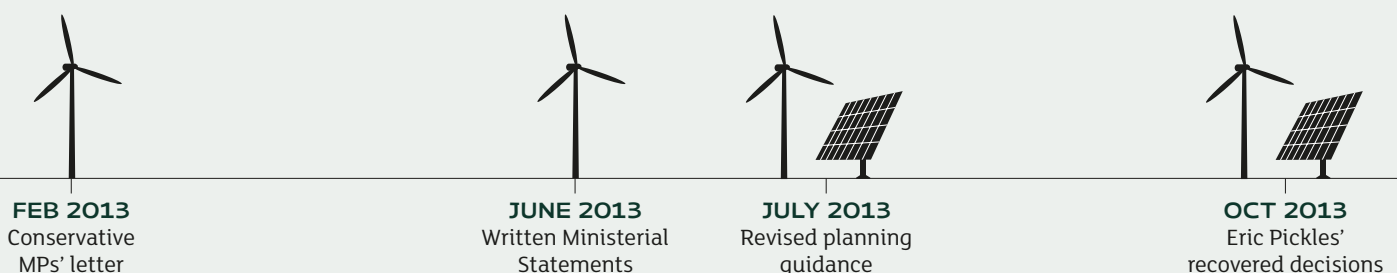
<sup>2</sup> CPRE's "Generating light on landscape impacts": <http://www.cpre.org.uk/resources/energy-and-waste/climate-change-and-energy/item/2823-generating-light-on-landscape-impacts>

<sup>3</sup> Written Ministerial Statement by Eric Pickles, June 2013: <https://www.gov.uk/government/speeches/local-planning-and-onshore-wind>; Written Ministerial Statement by Edward Davey, June 2013: <https://www.gov.uk/government/speeches/written-ministerial-statement-by-edward-davey-onshore-wind>

<sup>4</sup> Planning Practice Guidance for renewable and low carbon energy: <https://www.gov.uk/government/publications/planning-practice-guidance-for-renewable-energy>

<sup>5</sup> Online planning guidance for renewable and low carbon energy: <http://planningguidance.planningportal.gov.uk/blog/guidance/renewable-and-low-carbon-energy/>

## TIMELINE OF EVENTS





**THE GOVERNMENT'S COMMITMENTS AND THEIR DELIVERY**

**"...IT HAS BECOME CLEAR THAT ACTION IS NEEDED TO REFLECT THE BALANCE EXPECTED BY THE NATIONAL PLANNING POLICY FRAMEWORK ON ONSHORE WIND. WE NEED TO ENSURE THAT PROTECTING THE LOCAL ENVIRONMENT IS PROPERLY CONSIDERED ALONGSIDE THE BROADER ISSUES OF PROTECTING THE GLOBAL ENVIRONMENT."**

RT HON ERIC PICKLES MP, SECRETARY OF STATE FOR COMMUNITIES AND LOCAL GOVERNMENT, 6 JUNE 2013

**"IN PUBLISHING THE GUIDANCE, WE HAVE BEEN QUITE CLEAR THAT THE NEED FOR RENEWABLE ENERGY DOES NOT AUTOMATICALLY OVERRIDE ENVIRONMENTAL PROTECTIONS AND THE PLANNING CONCERNS OF LOCAL COMMUNITIES."**

RT HON ERIC PICKLES MP, SECRETARY OF STATE FOR COMMUNITIES AND LOCAL GOVERNMENT, 9 APRIL 2014

**"THIS GOVERNMENT HAS INTENTIONALLY AND OPENLY CHANGED PLANNING GUIDANCE RELATING TO ONSHORE WINDFARMS, GIVING GREATER PROTECTION FOR LOCAL HERITAGE AND LOCAL LANDSCAPE."**

KRIS HOPKINS MP, MINISTER FOR COMMUNITIES AND LOCAL GOVERNMENT, 13 MAY 2014



**DEC 2013**

Pre-application consultation made compulsory



**EARLY APRIL 2014**

Extension of period for recovering decisions



**LATE APRIL 2014**

Conservatives announce plan to remove subsidies



**MAY 2014**

Government propose subsidy changes

# SECTION 1

## Are more renewable energy projects now being approved in the right places?

### The effect of the new guidance and political intervention

In the period between the Government publishing revised planning guidance for renewable energy on 29 July 2012 and 1 May 2013<sup>6</sup>, four out of five (81%) onshore wind and solar electricity or photovoltaic (PV) projects were approved. A year later, after publication of the new guidance, only three out of five (61%) such projects were approved over the equivalent time period. Significantly fewer onshore wind and solar projects have therefore been approved than would have been the case if the approval rate before the new guidance had been maintained. The Secretary of State for Communities, Rt Hon Eric Pickles MP, said in April 2014 that: “I am pleased to confirm that the guidance is helping ensure decisions do reflect the environmental balance set out in the framework. I note, for example, that prior to the guidance, more appeals were approved than dismissed for more significant wind turbines. Since the guidance, more appeals have been dismissed than approved for more significant turbines.”<sup>7</sup>

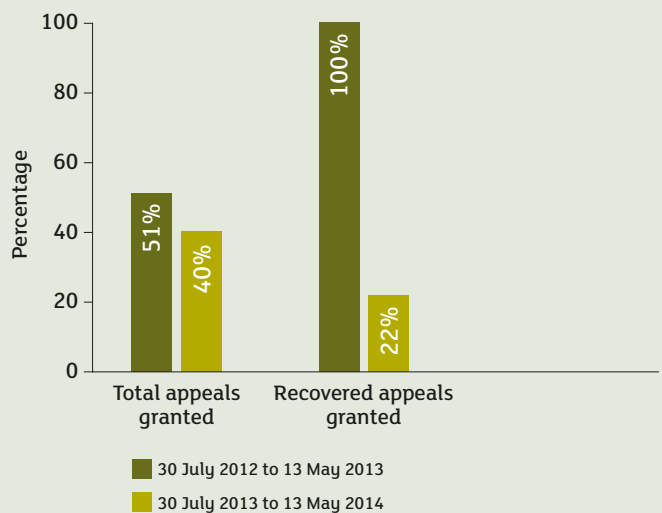


These headline figures suggest that the guidance may have had an effect on approval rates. The most recent period, however, includes significant interventions by the Secretary of State in decision-making by “recovering” decisions from the Planning Inspectorate or “calling-in” decisions from Local Planning Authorities (LPAs). This is also likely to have played a part in the significant decrease in approval rates. Furthermore, these figures do not reveal much about the quality of the decision-making, and whether they struck the correct balance between providing low carbon energy and local impacts.

### Recent cases

Some recent high-profile onshore wind and solar farm cases suggest that better protection may now be given to the local environment. For example, two court cases relating to onshore wind suggest that greater weight should be attached to the impact of developments on the setting of heritage assets<sup>8,9</sup>. A further wind turbine case suggests that greater attention should be paid to cumulative impacts, alternative options and the efficiency of the infrastructure<sup>10</sup>.

### APPEAL CASES GRANTED



The total number of appeals analysed was 294: 103 in 2012-13 and 191 in 2013-14

<sup>6</sup> The most recent data available in DECC’s Renewable Energy Planning Database at the time of research

<sup>7</sup> Written Ministerial Statement by Eric Pickles, April 2014: <https://www.gov.uk/government/speeches/local-planning-and-renewable-energy-developments>

<sup>8</sup> <http://www.planningresource.co.uk/article/1281410/energy-firm-loses-appeal-northamptonshire-wind-farm>

<sup>9</sup> <http://www.bbc.co.uk/news/uk-england-norfolk-26185017>

<sup>10</sup> <http://www.planningresource.co.uk/article/1293604/appeal-court-overturms-nottinghamshire-turbine-approval>



Two recent solar farm appeal decisions also appear significant. One suggests that less weight should be given to the reversibility of solar farms on agricultural land<sup>11</sup>, and another indicates that developers may need to carry out more-robust searches for non-agricultural land<sup>12</sup>. But can we conclude from planning appeals data that there is now stronger local environmental protection?

CPRE analysed appeals data in the period immediately after the revised planning guidance was published (30 July 2013 to 13 May 2014) and in the equivalent period a year before (30 July 2012 to 13 May 2013). In total 294 appeals were included in the study. We found that a significantly higher percentage of appeals were approved in 2012-13 (51%) compared with 2013-14 (40%), mirroring the trend in planning decisions overall. CPRE also found that a greater proportion of appeals were recovered in 2013-14 than in 2012-13, with the percentage of approvals among the recovered appeals plummeting in the most recent period – only 22%, compared with 100%.

Because of their political nature, decisions recovered or called-in by the Secretary of State are likely to attract more publicity and tend to carry more weight than most appeal cases decided by Inspectors. In the recovered appeals we considered in our research, the Secretary of State agreed with the Inspector's decision to allow the only recovered appeal in 2012-13, while in 2013-14 the Secretary of State disagreed with the Inspectors' decisions in three out of the ten recovered appeals by dismissing them.

### Landscape impact

The percentage of appeals in which Inspectors specifically weighed up the benefit of renewable energy against the harm to landscape, and other aspects of the local environment, is not very different in 2013-14 (48%) compared with 2012-13 (52%). Our qualitative analysis of the appeal decisions also reveals an inconsistent approach. In both periods, some Inspectors considered this benefit/harm equation and made their decision based on where they thought the balance lay. Other Inspectors attached significant weight to the

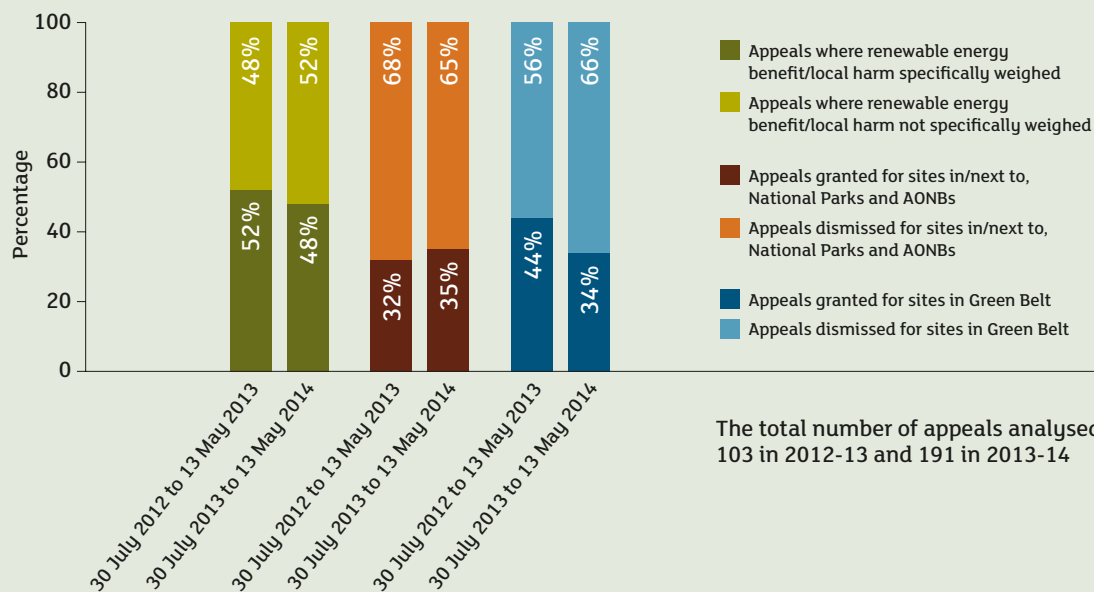


Royd Moor, South Yorkshire

<sup>11</sup> <http://cornerstonebarristers.com/case/pickles-says-hacheston-solar>

<sup>12</sup> <http://www.planningresource.co.uk/article/1298633/refusal-signals-tough-line-solar>

**ANALYSIS OF LOCAL ENVIRONMENT ISSUES IN APPEAL CASES**



The total number of appeals analysed was 294: 103 in 2012-13 and 191 in 2013-14



generation of low-carbon energy and only turned down planning permission if they believed there was overriding harm to the local environment.

CPRE’s analysis shows that the proportion of appeals granted for sites in, or adjacent to, National Parks and AONBs was similar in 2012-13 and 2013-14. However, the proportion of appeals relating to Green Belt sites that were allowed in 2012-13 (44%) was much greater than in 2013-14 (34%). This could be interpreted as being a result of Green Belts being afforded relatively greater protection in the most recent period. It is difficult, however, to attribute this solely to the revised planning guidance as the guidance does not explicitly mention the Green Belt. It is possible, however, that the revised guidance had a knock-on effect by increasing the protection given to Green Belt protection.

**Community views**

The opinions of the local community are specifically mentioned by Inspectors in only a handful of the appeals. The proportion of total appeals where community views are cited was actually lower in 2013-14 than in 2012-13 (2% versus 4%) suggesting Ministerial intentions about giving communities greater say on developments<sup>13</sup> have not explicitly carried through to appeal decisions. When the Government announced it was going to publish new planning

<sup>13</sup> <https://www.gov.uk/government/news/greater-community-say-on-wind-turbines-and-solar-farms>

guidance for renewable energy, some media sources published articles suggesting that the changes could allow local people to veto wind developments<sup>14</sup>. Another article highlighted that there would be a problem for planners as a result of the difference between the public perception of the Government's announcement and what the guidance actually directed planners to do<sup>15</sup>. This highlights the often considerable gap between policy and media interpretation.

### A mixed picture

A mixed picture emerges from our research of the impact of the revised planning guidance and other changes announced in summer 2013. The guidance helpfully clarifies that the need for renewable energy does not automatically override environmental protections and the planning concerns of local communities. But there are still issues with the detail of the guidance. For example, CPRE is concerned that its treatment of cumulative impacts is inadequate, and in several places the guidance references the National Policy Statements (NPSs) as a source of further information, but the current renewable energy NPS – published in 2011 – does not mention solar energy specifically. The changes have certainly contributed to the decrease in the proportion of projects approved, but it is difficult to discern their effect as distinct from the significant and direct Ministerial interventions in the planning decisions. Whether the changes have genuinely led to greater weight being attached to local environmental impacts in planning decisions more generally is unclear.

This prompts a question about whether amending the guidance is an adequate approach. Since the Government published the revised guidance for renewable energy in July 2013, it made further revisions in March 2014, including to further emphasise the need to take account of local environmental issues, and in April 2014, to include the legal requirement for pre-application consultation with the local community for more-significant wind turbine developments. The Conservatives have indicated they will change renewable energy planning policy again if they win the next election to give greater protection to “locally valued landscape, heritage and other concerns”, and have also proposed removing subsidies from onshore wind developments<sup>16</sup>. The Government is reviewing subsidies for solar farms and other solar PV installations<sup>17</sup>.

## CASE STUDY AVONMOUTH DOCKS WIND DEVELOPMENT

Avonmouth docks in Bristol has three phases of wind turbine development:

- Three turbines at the Bristol Sewage Treatment Works (Ecotricity);
- Four turbines also at the treatment works (Triodos Renewables);
- Two wind turbines on a former oil storage site (Bristol City Council).

The turbines are on brownfield land within a low-lying industrial landscape surrounded by higher land. The area is not subject to any specific landscape designations. Set within the numerous tall structures in this industrial landscape, visual and cumulative impacts are minimised. The turbines are located close to the Severn Estuary, which is important for overwintering and breeding shorebirds. However, extensive bird surveys revealed that there would not be any significant effects on birdlife, and mitigation measures were put in place to minimise disturbance from the construction work. A significant advantage of these wind developments is that they are close to a large number of industrial consumers so transmission losses are limited.



<sup>14</sup> <http://www.architectsjournal.co.uk/government-shakes-up-planning-rules-for-wind-farms/8649035.article>

<sup>15</sup> <http://www.planningresource.co.uk/article/1186055/no-veto-wind-farm-plans>

<sup>16</sup> <http://www.businessgreen.com/bg/news/2341291/conservatives-confirm-plans-to-scrap-onshore-wind-subsidies>

<sup>17</sup> <https://www.gov.uk/government/consultations/consultation-on-changes-to-financial-support-for-solar-pv>



Renewable energy policy has been influenced by Conservative backbenchers' concerns – as noted previously. And while the Conservative Minister Michael Fallon MP was at pains to point out that the effect on customers' bills was central to the Conservative's announcement about onshore wind, it seems likely that subsidy changes are also being proposed in response to backbenchers' concerns to help control particular types of development. This reinforces CPRE's belief that the planning system for renewable energy is still not sufficiently robust. It suggests that subsidies may be being used to constrain types of development that are politically difficult to support. Instead, the answer may lie in amending the National Planning Policy Framework (NPPF) to provide the necessary clarity. The current approach – with a raft of changes to the planning system and to subsidies – risks reducing certainty among communities, developers and investors.



### CASE STUDY BALANCING LOCAL AND GLOBAL IMPACTS IN EAST YORKSHIRE

The highly valued countryside around the villages of Thornholme, Haisthorpe and Burton Agnes in east Yorkshire was subject to an application for a large windfarm at Thornholme Fields which, after a very lengthy process, was turned down by Secretary of State Eric Pickles. The area is near to the Yorkshire Wolds and important heritage assets, including the Grade 1 listed Burton Agnes Hall. East Yorkshire as a whole already has a significant amount of wind development, and further applications are continuing to come forward in sensitive rural areas.

The application in August 2011 was for six turbines 100m high or more, which East Riding's planning committee refused on the grounds of landscape harm and harm to heritage. The developer appealed and a public inquiry was held in July 2013, when the revised planning guidance for renewable energy was published. The Planning Inspector approved the application. The Secretary of State "recovered" the decision, over-ruled the Inspector and refused the development citing harm to the landscape, heritage and amenity. The Government published the final decision in May 2014.

In this case the intervention by the Secretary of State ensured a proper balance was struck between protecting the countryside and producing renewable energy. But it also highlights significant wasted time and money. Overall, East Riding of Yorkshire Council has spent large amounts of money defending wind energy appeals relating to sensitive rural areas, which it has often lost. It is vital the planning system inherently reflects the balance required, rather than relying on national political intervention.









# SECTION 2

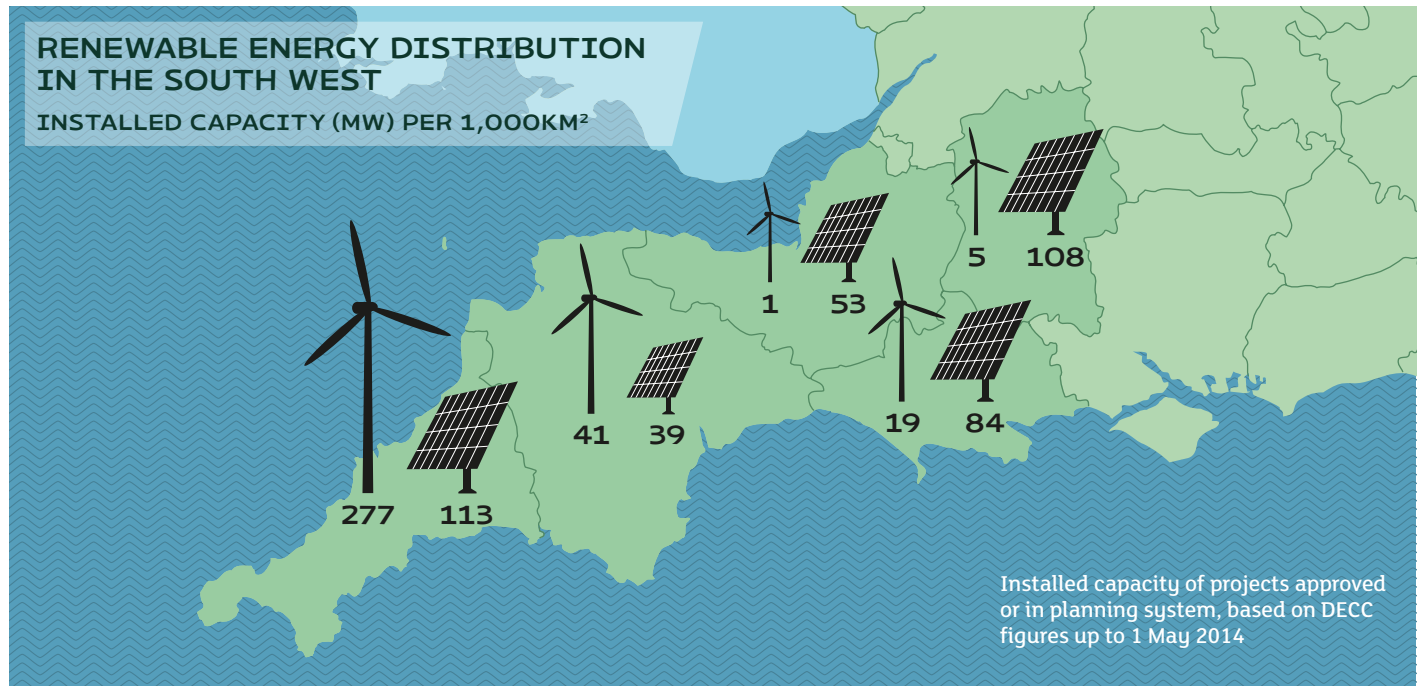
## Localism in action or a lack of strategic planning?

### Differences in the distribution of technologies between areas

CPRE’s research into the types and extent of renewable energy development in two areas of the country – the south west of England, and Yorkshire and the Humber – reveal major disparities between neighbouring areas. But can this be mainly put down to differing local priorities and community choice or an absence of strategic planning?

There are some differences in the distribution of solar PV developments between the counties in the south west that we analysed, even when county areas are taken into account

to give installed capacity per unit area. But the most marked differences are in onshore wind. For example, the installed capacity of onshore wind projects either approved or currently in the planning system in Dorset, Somerset and Wiltshire combined is 74MW, compared with 277MW in Devon and 987MW in Cornwall. Taking the county land areas into account, Devon has almost twice the capacity approved or in the planning system as Dorset, Somerset and Wiltshire combined, and Cornwall has more than eleven times the capacity of these three counties combined.



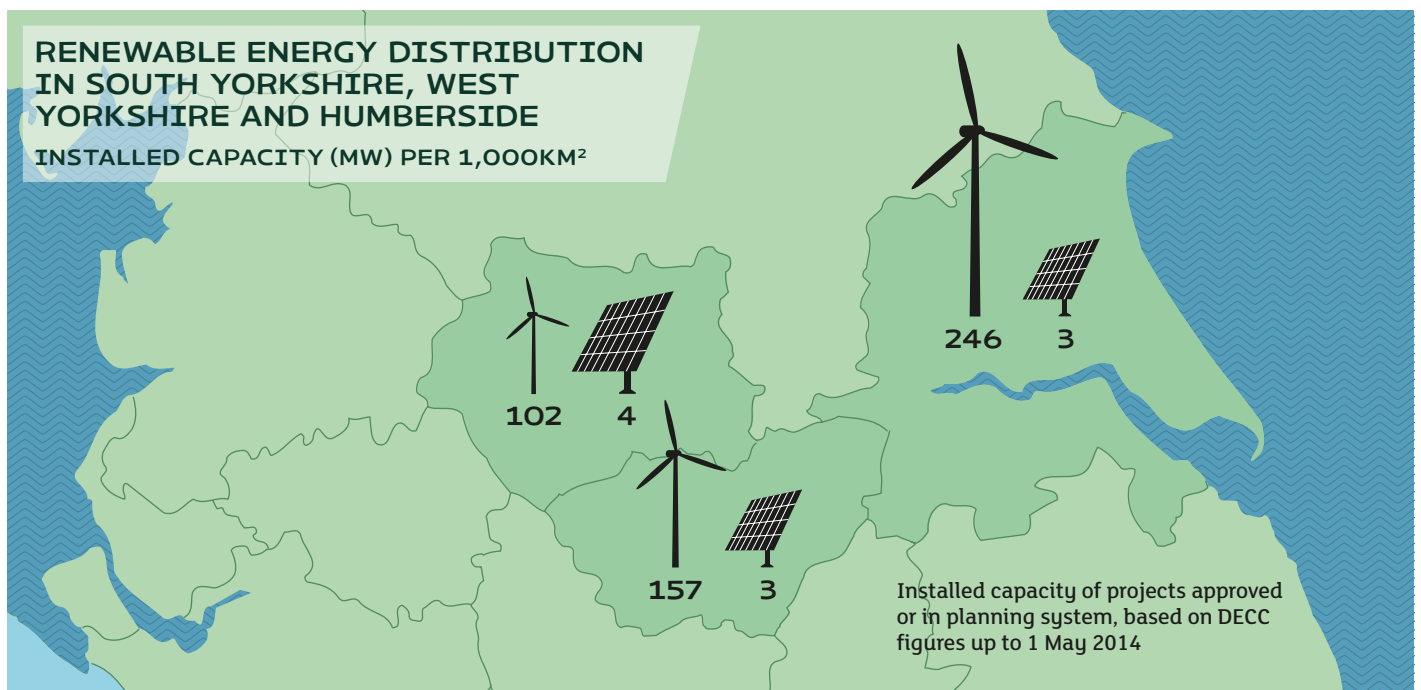
	Area	Solar photovoltaics			Onshore wind		
		Number of projects	Installed capacity (MW)	Installed capacity (MW) per 1,000 km <sup>2</sup>	Number of projects	Installed capacity (MW)	Installed capacity (MW) per 1,000 km <sup>2</sup>
Cornwall	3,563 km <sup>2</sup>	98	402	113	106	987	277
Devon	6,707 km <sup>2</sup>	83	261	39	47	277	41
Dorset	2,653 km <sup>2</sup>	30	224	84	3	50	19
Somerset	4,171 km <sup>2</sup>	61	222	53	7	6	1
Wiltshire	3,485 km <sup>2</sup>	42	376	108	1	18	5



There are also pronounced differences in the distribution of onshore wind capacity in Yorkshire and the Humber, either approved or currently in the planning system. For instance Humberside, including the East Riding of Yorkshire, has about the same area as South Yorkshire and West Yorkshire combined, but approximately twice as much onshore wind capacity approved or in the planning system.

It is likely that there are a number of factors contributing to the vastly different distribution of renewable energy infrastructure highlighted above. These will include justifiably different local priorities and approaches – hopefully informed by the views of local communities. Other factors that are likely to affect the distribution include differences in typical weather patterns, landscape sensitivity and the availability of electricity grid connections.

It is entirely valid for communities to decide which renewable energy technologies are most appropriate in their areas and where they should go. Our research into appeal decisions, however, indicates that community views are not always taken sufficiently into account in planning decisions. Our research into Local Plan progress also makes it seem unlikely that clear local priorities on renewable energy technologies are the principal drivers behind the major differences in distribution between areas that we are seeing. The examples on this page and page 12 therefore suggest that there is an absence of a strategic, plan-led approach to developing energy infrastructure locally and particularly across planning boundaries – and therefore directing infrastructure towards locations of least local environmental impact.



	Area	Solar photovoltaics			Onshore wind		
		Number of projects	Installed capacity (MW)	Installed capacity (MW) per 1,000 km <sup>2</sup>	Number of projects	Installed capacity (MW)	Installed capacity (MW) per 1,000 km <sup>2</sup>
Humberside	3,512 km <sup>2</sup>	20	10	3	86	863	246
South Yorkshire	1,552 km <sup>2</sup>	4	4	3	22	243	157
West Yorkshire	2,029 km <sup>2</sup>	12	8	4	26	206	102

## Landscape character

An important issue for CPRE and local communities is how far our landscapes can accommodate necessary changes while retaining the character we value. Not all landscapes have the same value, although many that are not nationally designated will nevertheless be of real importance to people. Determining landscape value objectively requires an understanding of a landscape's characteristics and quality. These should be important considerations when determining where energy infrastructure should go. When done well, landscape character assessments, alongside community engagement, are the most established way of determining capacity and sensitivity, and therefore the relative ability of areas to accommodate renewable energy and other development without unacceptable adverse impacts.

Landscape character assessments can provide an additional layer of very useful evidence for communities and decision makers to help determine suitable locations for energy infrastructure. LPAs need to take a strategic, plan-led approach to siting infrastructure locally and across planning boundaries, and the Government needs to support them to do this. For example, CPRE's Peak District and South Yorkshire branch have used the landscape character and capacity assessments for onshore wind carried out by Doncaster Council to inform its views on which onshore wind applications to support and which to object to. The assessments are robust, but lack a sense of the required targets for renewable energy development, which LPAs are generally unwilling to develop. This is mainly due to lack of resources, but also because it can be a highly contested issue among constituents. As a result, the planning system for renewable energy lacks a clear sense of the scale of infrastructure required in different areas.

## CASE STUDY JOINT LOCAL PLANS IN NORTHAMPTONSHIRE

The district and borough councils in Northamptonshire are aiming to develop joint Local Plans across administrative boundaries, including a collective vision and objectives. One Local Plan area is "West Northamptonshire" covering Daventry, Northampton and South Northamptonshire councils. The second Local Plan area is "North Northamptonshire", which covers East Northamptonshire, Corby, Kettering and Wellingborough councils. This joint planning approach could help to deliver a more-strategic approach to siting infrastructure, including that for renewable energy. However, there have been delays partly because of different perspectives among the more-rural and more-urban councils developing the plans. This highlights the potential importance of grouping with local planning authorities with similar priorities. The joint Local Plan approach could offer a useful way forward in some places.



## CPRE's view on strategic planning

CPRE's 2012 report on accommodating onshore wind in the countryside highlighted that the Government's renewable energy capacity methodology was a helpful step towards determining the opportunities and constraints for the deployment of renewable energy regionally and locally. However, we raised questions about whether the resulting regional reports were effectively informing local strategies.

We advocated a strategic, plan-led approach that takes account of landscape capacity, including cumulative

impacts, to better enable us to value and protect landscapes and connect local decisions to a coherent national renewable energy strategy. We also highlighted that this approach would mean that communities, not energy companies, decide what renewable energy technologies they want and where they should go. Since 2012, there has been little evidence that such a strategic approach to siting renewable energy infrastructure has advanced in any way.







# SECTION 3

## How can the planning system better address cumulative impacts?

### Increasing pressure on rural areas

Cumulative impacts concern the degree to which a proposed development will become a feature in particular views, or sequences of views, as experienced by people. Our analysis of planning appeals data shows that the percentage of appeals where Inspectors specifically mentioned the cumulative impact of energy infrastructure was similar in the period from 30 July 2012 to 13 May 2013 (28%) and in the equivalent period a year later (29%) – after the revised planning guidance was issued. This suggests that the planning guidance did not make a great deal of difference to the way cumulative effects were considered during appeals.

Qualitative interrogation of the appeals data reveals that in these two time periods, pylons are cited by some Inspectors as helping to increase the acceptability of wind turbines in landscapes where they are visible. Subjectivity dominates in the absence of specific, robust guidelines for Planning Inspectors and LPAs on assessing and minimising cumulative impacts of energy infrastructure generally, and renewable energy specifically.

### Clearer steer and better tools needed

The Government's revised planning guidance for renewable energy briefly considers how cumulative impacts should be assessed and, in more depth, what information is needed to assess them. It considers as cumulative impacts those effects that arise from one or more of the same type of renewable energy development, and also the degree to which a proposed development will become a significant or defining characteristic of the landscape. However, the guidance only does this specifically for onshore wind, although it says that the approach to solar "is likely to be the same as assessing the impact of wind turbines".

The guidance does not consider cumulative impacts from more than one technology or type of infrastructure – a scenario becoming increasingly common in rural areas. These multi-technology impacts are not easy to assess, but they must be properly considered if our countryside is to be adequately protected from excessive development.

Taken together with the evident lack of a strategic, plan-led approach to developing energy infrastructure highlighted in the previous section, the absence of a clear steer and adequate tools for planners and planning decision-makers on cumulative impacts is worrying. It risks an increasingly chaotic approach, with new energy infrastructure proposed in addition to what is already in place, with planners ill-equipped to consider the full range of cumulative effects.

CPRE believes that this situation urgently needs to be addressed as the pressure for new energy infrastructure in the countryside is unlikely to disappear. More-comprehensive and robust guidelines are needed for LPAs and Planning Inspectors on assessing and minimising cumulative impacts of energy infrastructure – including from multiple technologies. These could be facilitated by Government, but produced by a well-respected third party. However, the Government should be responsible for clearly communicating to LPAs and Planning Inspectors that they should adhere to the guidelines in their decision-making. Without this our countryside will be one of the clear losers. There is ongoing pressure not only from renewables, but also from a desire to exploit fossil fuels further – largely as a result of the Government's insufficiently cautious approach to fracking, shale gas and shale oil.



Cumulative impacts of energy infrastructure in East Sussex

## CASE STUDY CUMULATIVE IMPACT OF WIND DEVELOPMENT IN ALLERDALE, CUMBRIA

Allerdale has been the focus for wind energy developers over the past 15 years because the area has very good wind resources, but it also has high landscape value and is renowned for its wildlife. It sits between the Lake District National Park and the Solway Coast Area of Outstanding Natural Beauty. The area also hosts an internationally important population of pink-footed geese, whose feeding areas are under increasing pressure from development.

A 2007 planning policy, adopted by the Cumbrian local authorities outside the National Park, identifies huge areas of Cumbria as having moderate or high capacity to accommodate wind development. However, it does not take cumulative impact into account, which, in the years since, has become a major issue in the area.

Research by Allerdale Borough Council in 2013 showed that this relatively small area had received well over half the applications for wind turbines in Cumbria, and had nearly two thirds of the entire wind energy generation

capacity in the county. The council has refused a number of wind energy applications, but many of these have been allowed at appeal by the Planning Inspectorate – a situation that has been replicated in other parts of the country. For example, in early 2014 appeals relating to three adjacent sites were all allowed by the same Inspector at the same time, failing to recognise the cumulative impacts. Despite numerous letters of objection, local communities feel their views have not been taken into account by the planning system. The council's planning department do not have adequate resources to deal with the large number of applications.

This example highlights the urgent need for the Government to adequately support local authorities in properly addressing cumulative impacts. It also shows that some Planning Inspectors need a better understanding of cumulative impacts so they can consistently build this into their decision-making.



# SECTION 4

## How effective are Local Plans for planning renewable energy?

### CPRE's view on Local Plans

CPRE's 2012 report on accommodating onshore wind in the countryside stressed that we support the development of renewable energy led by clear locational criteria in local development plans – now termed Local Plans. We noted that if these are well conceived, such policies will empower local planning authorities and communities to make informed decisions about the best places to site renewable energy. Without this local strategic planning, CPRE feared that more decisions would be made by national Planning Inspectors at appeal, rather than at the local level. Certainly there has been a significant increase in the number and proportion of planning decisions going to appeal since 2012.

In the report we recommended that:

- The Government should ensure local planning authorities seek to protect landscape character in their Local Plans and in planning decisions to ensure more-appropriate siting of proposals;
- The Government should also instruct the Planning Inspectorate to give significant weight when making decisions on proposals to any Local Plans that have identified appropriate and inappropriate areas for development.

The ministerial statements on 6 June 2013 represented a good step by the Government towards these aims, but we would like to see the Government continue to encourage progress in these areas by local authorities and the Planning Inspectorate.

### Local Plan coverage across the country

CPRE published a report on the effect of the NPPF two years after its publication<sup>18</sup>. Among other issues, this looked at Local Plan adoption rates. The report concluded that, following initial signs of promise in the two years before the adoption of the NPPF, the rate at which LPAs are getting adopted plans in place has slowed significantly since March 2012.

At the time of writing, the Government's most up-to-date information shows that 194 LPAs have Local Plans either "found sound" by the Planning Inspectorate, which checks the plans, or adopted. This represents only 58% of all LPAs. We recognise that the Local Plan process is lengthy and represents a challenge for LPAs at a time when their resources are extremely stretched. However, such patchy Local Plan coverage creates a local planning policy vacuum. As a result, the local planning system is not as robust as it needs to be to steer renewable energy developments to the most appropriate locations and ensure they minimise local impacts.

We have looked at a sample of LPAs to assess the effect Local Plans are having on planning for renewable energy infrastructure. In each of the nine English regions, we selected the LPAs that have the highest amount of installed onshore wind and solar PV capacity in approved and submitted, but undetermined, planning applications.

Out of the 12 LPAs that have the most significant renewable energy development on the ground or in planning, only three have current Local Plans fully in place – "found sound" or adopted. The Appendix gives further details of the Local Plans included in the study. Of the three Local Plans that have been completed (Merton Council, Shepway District Council and Shropshire Council), only Shepway adopted its Local Plan after the NPPF and July 2013 revised planning guidance on renewable energy. All three Local Plans support the generation of renewable energy with specific guidance referenced in the "Core Strategy", but Shepway's Core Strategy deals with local environmental issues in most depth.

### Local Plan progress in areas with significant renewable energy development

This suggests that where Local Plans are most needed to shape renewable energy developments, coverage is even less complete than across the country as a whole. Our research indicates that LPAs may have good planning policies for renewable energy – either as part of a draft Local Plan or as a free-standing policy document. But unless they are properly integrated into the Local Plan and the Local Plan is adopted, they will not have the full weight of planning policy. This has been highlighted in a number of appeal decisions. However, good practice is emerging in some LPAs' Local Plans – for example, see the case study on Local Plans in Kent on page 19.

<sup>18</sup> CPRE's "Community Control or Countryside Chaos?": <http://www.cpre.org.uk/media-centre/latest-news-releases/item/3568-planning-reforms-putting-rural-england-under-siege>



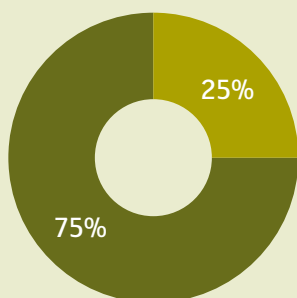
**CASE STUDY  
APPROPRIATE AND  
INAPPROPRIATE SOLAR FARMS**

An example of a well-sited and well-designed solar farm, which was supported by the Suffolk Preservation Society, is on a site at Fakenham Magna in St. Edmundsbury district, Suffolk. The application was for an 11MW solar farm on a 55 acre site, less than half the area originally proposed, which significantly reduced its visual prominence. The Society concluded that the scheme would have a negligible impact on public views as it was well screened by mature hedgerows and the local topography, and it is on lower quality agricultural land. The council approved the application in December 2012.

In contrast, planning permission for a 28MW solar farm on 175 acres of land at Mapperton Farm in south Dorset was quashed following a judicial review. A strong campaign to stop the development was mounted by local residents and CPRE's Dorset branch. The branch supports renewable energy and is not opposing the majority of solar farms, but this proposed large-scale scheme was visually intrusive and on good arable land. CPRE also believes that much greater use should be made of solar panels on commercial and industrial roofspace, which is still under-used in Dorset.



**ANALYSIS OF LOCAL PLAN PROGRESS IN  
AREAS WITH SIGNIFICANT RENEWABLE  
ENERGY DEVELOPMENT**



Out of the 12 local authorities that have the most significant renewable energy development on the ground or in planning in each of the English regions, only three (25%) have current Local Plans fully in place.

**CASE STUDY  
LOCAL PLANS AND RENEWABLE  
ENERGY IN KENT**

Shepway and Maidstone District Councils are at different stages in developing their Local Plans, but both are integrating robust policies into their plans that strike a good balance between local environmental protection and generating renewable energy.

Shepway has a significant amount of onshore wind and solar energy that has either been approved or is currently going through the planning system. Before the planning guidance for renewable energy was revised in July 2013, the council approved a large solar farm. CPRE's branch, Protect Kent, believes that, although this solar farm was not as well sited and designed as they would have liked, the council has learnt lessons for future applications. The council adopted its Local Plan in September 2013 and its current Local Plan policies are comprehensive for onshore wind, incorporating landscape and other key local considerations. The forthcoming update of the renewable energy policy will allow issues relevant to solar farms to also be included.

Maidstone has little onshore wind but, as in Shepway, there have been several solar farm applications. The council is yet to submit its Local Plan policies to the Planning Inspectorate for review, but its politicians have agreed its renewable energy policy. The policy clarifies that schemes should not conflict with landscape character or existing uses and must address other potential issues such as noise, visual, cumulative and heritage impacts. It also gives preference to previously developed or poorer quality agricultural land. The council has also adopted specific planning advice for solar projects as part of the Local Plan.



## SECTION 5

### How effectively are brownfield sites being used?

#### Lack of up-to-date figures

The amount of brownfield, or previously developed, land and its suitability for redevelopment is a contested area. The absence of reliable, up-to-date figures on its extent is a major contributory factor. The Government's 2010 figures suggest that the total area of available brownfield land is significant, and it is unlikely that it has reduced significantly since then. Given the current housing crisis, CPRE's view is that suitable brownfield land on which sustainable housing can be developed should be used for that purpose as a priority. This new housing – or any other new buildings on brownfield sites – should be built to the highest possible energy efficiency standards, and should ideally have solar energy installed from the outset.

#### Brownfield and solar

Brownfield land unsuitable for housing can be considered for other uses, such as solar farms. Using sites for solar would be in-keeping with wildlife groups' calls to use more brownfield land to increase biodiversity. If only a relatively small proportion of the total area of brownfield land available for new development was suitable for solar PV – for example, because of the constraints imposed by grid connections, orientation and shading, unacceptable local impacts or other factors – it could still be significant. And, as with housing,

we believe that it would make sense to use any brownfield land suitable for solar farms first, rather than greenfield sites. If a solar farm is developed on a brownfield site, it should still meet key criteria to make it acceptable, including being appropriately sited and well designed to minimise landscape impacts.

In August 2013 developer Kronos Solar claimed that there were virtually no brownfield sites suitable for solar farms. Some – including the Solar Trade Association – questioned the methodology used to arrive at this conclusion<sup>19</sup>. One of the questionable assumptions the developer made was that the vast majority of the brownfield sites were not financially viable because they were smaller than 10 hectares (about 14 football pitches). But the Government's renewable energy planning database<sup>20</sup> reveals that there are many solar farms on sites less than this area. A site of this size can host a solar farm with a capacity of about 5MW, depending on the exact size, capacity and arrangement of the panels. Whatever the exact figure is for brownfield sites suitable for solar PV, the Government's proposal to exclude all solar farms over 5MW from Renewables Obligation subsidies from April 2015 may reduce the number of brownfield sites that can be used in this way.

Brownfield sites, such as old airfields like this one in Suffolk, can be suitable for solar farms



<sup>19</sup> <http://www.planningresource.co.uk/article/1207865/not-enough-brownfield-land-solar-farms-developer-claims>

<sup>20</sup> <https://restats.decc.gov.uk/app/reporting/decc/monthlyextract>





CPRE wants more incentives for new solar technologies such as solar tiles

### Roof installations

The Government has estimated that there are 250,000 hectares of existing south-facing roofs in the UK<sup>21</sup>. This is undoubtedly a very significant area and the Government is proposing to open up Feed-in Tariff subsidies to mid-sized solar PV installations on commercial rooftops, and also extend permitted development rights from 50kW to 1MW to accelerate commercial roof PV. CPRE welcomes these moves. Solar electricity associated with buildings reduces the local environmental impacts of infrastructure and also provides generation at the point of use, reducing distribution and transmission losses.

However, there are other significant barriers hampering extensive use of this roofspace for solar PV, such as the complexity of commercial building ownership and leasing, and the approach to building valuations. We believe the Government needs to do more to address these additional barriers to enable the commercial rooftop PV sector to grow significantly. This could include giving owners and landlords greater incentives to support solar electricity, ensuring surveyors' valuations give proper regard to its benefits and ensuring permitted development rights do not unnecessarily constrain opportunities for solar electricity.

CPRE also wishes to see support for solar electricity on new housing and commercial buildings, including encouraging new technologies such as solar tiles and thin-film solar. This would avoid the need for retrofitting. The Government could enhance subsidies to help drive this approach among developers. LPAs can also provide support through planning conditions to require solar electricity on new build where feasible.

### CASE STUDY SOLAR VILLAGE IN ESSEX

Brook Farm in Essex takes environmental sustainability seriously – encouraging wildlife and minimising environmental impacts while producing food. The farm is more than halfway to its target of producing as much electricity as it uses, with 60kW of solar photovoltaic (PV) installed so far in unobtrusive locations next to the farm buildings. The farm is also exploring whether translucent PV panels could be used like fencing on field edges. It could mean greater solar gain per acre given that it can generate from both sides, thereby reducing the area needed and making it easier to crop the land.

The local authority, Tending District Council, is supportive of renewable energy projects of the right scale and in the right locations. The council has agreed a renewable energy policy as part of its Local Plan. The policy states that the council will allow solar farms on low-grade agricultural land or land with no agricultural function.

Brook Farm and a number of other members of the community are exploring with a developer the possibilities for creating a “solar village”. Funding options are being considered, including the community self-funding some of their own projects. The possible options for deploying solar energy include:

- Small-scale ground-mounted solar PV panels on several farms, which could be used to power the local area;
- Solar PV panels on the village hall roof, rooftops of farm barns or a new 40-home development;
- Village residents being offered rooftop panels, or small ground-mounted solar PV, at their properties.



<sup>21</sup> The Government's UK Solar PV Strategy – Part 2: <https://www.gov.uk/government/publications/uk-solar-pv-strategy-part-1-roadmap-to-a-brighter-future>



## Conclusions

The evidence shows that the Government's changes to, and interventions in, the renewable energy planning system since summer 2013 have clearly reduced the proportion of solar farm and onshore wind projects receiving planning approval. This has helped reduce the associated landscape impacts and other local effects. Some of Eric Pickles' recovered decisions have also helpfully clarified some key issues – particularly in relation to heritage protection<sup>22</sup> and the weight given to the temporary nature of renewable infrastructure<sup>23</sup>.

CPRE's research suggests, however, that the jury is still out on whether the revised national planning policies are making the difference, or whether there is an unhealthy reliance on national political intervention, which in some cases is too heavy-handed<sup>24</sup>, to redress the balance between producing low-carbon energy and local environment impacts. It is difficult to discern the effect of the planning changes as distinct from the significant and direct Ministerial interventions in planning decisions.

We need a robust planning system that properly controls renewable energy development, taking account of landscape and other local impacts. Some believe that subsidy changes



Holy Trinity Church, Kingston upon Hull

proposed by the Government and the Conservatives are partly a response to a growing number of wind and solar proposals in sensitive locations but, if that is the case, it denies the proper role of planning. Too often the planning system and the system of subsidies for renewable energy seem to be at odds with one another. For example, significant growth in wind turbine and then solar farm developments getting planning approval has been followed by proposals to remove and limit subsidies respectively. The overall effect of the Government's changes is an approach that is unpredictable in its outcomes, which can often be the case where the planning process is subject to Ministerial intervention. This is unhelpful and confusing for communities, developers and investors.

Following our analysis, we conclude that:

- There continues to be an absence of a strategic, plan-led approach to developing renewable energy infrastructure, locally and across planning boundaries, directing it to locations where local environmental effects are minimised. Some LPAs have carried out landscape character and capacity assessments to inform its approach to planning renewable energy. However, they generally lack a sense of the required targets for renewable energy development. As a result the planning system for renewable energy lacks a clear sense of the scale of infrastructure required;
- Clear guidance for planners and decision makers on how to address cumulative impacts from energy infrastructure is also lacking, which urgently needs to be addressed;
- Local Plan coverage remains incomplete across the country and, in areas that have the highest levels of renewable energy capacity, either installed or in the planning system, it is even more patchy;
- It would make sense to use brownfield land unsuitable for housing for solar farms in preference to greenfield sites, which could include old airfields; the subsidy regime should be used to encourage this;
- It is positive that the Government wants to stimulate a significant expansion of solar electricity on commercial rooftops through Feed-in Tariff subsidies and revising permitted development levels. However, there remain major barriers hampering extensive use of commercial roofspace for solar electricity, including the complexity of commercial building ownership and leasing, and the approach to building valuations.

<sup>22</sup> <http://www.planningresource.co.uk/article/1296551/pickles-prioritises-heritage-wind-turbine-decisions>

<sup>23</sup> <http://cornerstonebarristers.com/case/pickles-says-hacheston-solar>

<sup>24</sup> <http://www.planningresource.co.uk/article/1290811/pickles-calls-wind-farm-scheme-approved-council>;

<http://www.telegraph.co.uk/earth/energy/solarpower/10921211/High-Court-quashes-Eric-Pickles-decision-to-block-solar-farm.html>;

<http://www.planningresource.co.uk/article/1289067/developer-launches-legal-challenge-against-pickles-wind-farm-refusal>

## Recommendations

### To address the key issues identified in this report, CPRE calls for:

- The Government to provide more certainty by amending the NPPF to reinforce its intention that the need for renewable energy does not automatically override local environmental protections and the planning concerns of communities;
- The Government and LPAs to work together to ensure effective strategic, local and cross-boundary planning for renewable energy. This could take a number of forms, depending on what would best suit particular areas. For example, LPAs with similar priorities and characteristics could develop joint Local Plans, work together effectively through the Duty to Cooperate or, in two-tier areas, county councils could take the lead on planning all energy infrastructure. This latter option would need the Government to facilitate it. LPAs should use landscape character and capacity assessments to inform the approach to planning renewable energy. They should also develop a clear sense of the scale of infrastructure required;
- The Government to ensure clear and robust practical guidelines are developed for LPAs and Planning Inspectors on assessing and minimising cumulative impacts of energy infrastructure – including from multiple technologies or types of infrastructure;
- LPAs to ensure comprehensive renewable energy policies are an integral part of Local Plans, informed by local landscape character assessments, to direct developments to the most appropriate places and minimise local impacts;
- The Government to ensure that its subsidy regime encourages use of suitable brownfield sites for appropriately sited and well-designed solar farms. For example, by enhancing subsidies for using brownfield areas unsuitable for housing and/or subsidising solar farms of a larger size if they are on brownfield rather than greenfield sites;
- The Government to do more to address the full range of barriers to commercial rooftop electricity to maximise opportunities for the sector, such as giving owners and landlords greater incentives to support solar electricity, and ensuring surveyors' valuations give proper regard to the benefits of solar electricity;
- LPAs to support solar electricity on new buildings by requiring it through planning conditions where feasible;
- In the longer term, the Government to develop an approach that better reconciles the planning system for renewables with the subsidy system. For example, exploring ways in which spatial considerations can be reflected in subsidies – such as reflecting the relative capacities of different landscapes to accommodate infrastructure, and whether a site is on brownfield or greenfield land. In the case of solar electricity, subsidies could be enhanced for integrating this with new buildings so it does not need to be retrofitted, which would help to support innovation and be more cost-effective.

# Appendix: Local Plans included in the study sample

Region	Local planning authority	Local Plan found sound and/or adopted?	Details of Local Plan process and policies
East Midlands	East Lindsey District Council	No	No Local Plan published or submitted to Planning Inspectorate. Landscape character assessment approved in 2011 and included in draft Local Plan documents.
East of England	South Cambridgeshire District Council	No	Local Plan published and submitted. Draft Core Strategy highlights need for renewable energy infrastructure impacts to be acceptable and sets 2km minimum distance between a turbine and any dwelling.
London	Merton Council	Yes	Local Plan adopted in 2011, prior to National Planning Policy Framework (NPPF) and revised planning guidance. Core Strategy promotes renewable and decentralised energy and highlights "Merton Rule" that requires large non-residential developments to provide at least 10% of their energy needs from renewables, employing technologies that best fit the local character of the area and avoid harm to local amenity.
North East	Northumberland Council	No	No Local Plan published or submitted.
	Durham Council	No	Local Plan published and submitted.
North West	Allerdale Borough Council	No	Local Plan published and submitted. Draft Core Strategy says that renewable energy proposals, where impacts (either in isolation or cumulatively) are, or can be made acceptable, will be permitted. The Local Plan also includes a wind energy supplementary planning document (SPD), and a specific policy on landscape, which states that the Cumbria Landscape Character Assessment Toolkit will be used to inform the detailed assessment of individual proposals.
South East	Shepway District Council	Yes	Local Plan adopted September 2013. Core Strategy states that any renewable energy applications will be very carefully scrutinised when they are likely to result in the loss of the best and most versatile agricultural land, or are likely to have an impact on areas of recognised landscape, nature conservation, or heritage value. Dungeness/Romney Marsh identified as an area that may contain suitable sites for renewable energy developments, but any projects would be judged against listed criteria above and particular attention should be paid to the need to protect bird life.
South West	Cornwall Council	No	Local Plan published, but not yet submitted. Draft Core Strategy says that policies in the plan are designed to promote renewable energy development while ensuring that adverse impacts are addressed satisfactorily, including noise and cumulative impacts. Planning guidance giving further advice on how impacts arising from renewable energy developments can be addressed is being prepared and will be progressed as a SPD to accompany the Local Plan. For wind and solar photovoltaic development, landscape character is seen as a key driver in determining the appropriate scale and density of development, with a broad landscape strategy informing the decision process.
	Torridge District Council	No	No Local Plan published or submitted.
	Wiltshire Council	No	Local Plan published and submitted. Some renewable energy issues are covered in the draft Core Strategy document, which states that proposals will need to demonstrate how they satisfactorily address impacts on a number of factors including landscape, particularly in and around Areas of Outstanding Natural Beauty, the New Forest National Park and the Green Belt.
West Midlands	Shropshire Council	Yes	Local Plan adopted February 2011, prior to the NPPF and revised planning guidance. It positively encourages infrastructure, where this has no significant adverse impact on recognised environmental assets, and helps to mitigate and adapt to climate change, including decentralised, low carbon and renewable energy generation. Further policy guidance on infrastructure, including criteria for large-scale renewable energy generation and distribution, will be produced.
Yorkshire and the Humber	East Riding of Yorkshire Council	No	Local Plan published and submitted. It promotes renewable and decentralised energy generation in appropriate locations. Energy proposals will be supported where any significant adverse impacts are satisfactorily minimised and the residual harm is outweighed by the public benefits of the proposal. The plan highlights a number of potential impact areas. It also notes that in assessing the capacity of the landscape to accept energy development, it will be important to consider the policy on "Promoting a high quality landscape" and the East Riding Landscape Character Assessment.



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- The Church of England
- Lightsource
- The National Trust
- Pete Thompson
- Triodos Renewables and James Barke

## Further information

A list of the 294 planning appeal decisions used in the research for this report is available as a separate document and can be downloaded from [www.cpre.org.uk](http://www.cpre.org.uk). Our website contains a great deal of additional information on energy and many other subjects.

CPRE fights for a better future for England's unique, essential and precious countryside. From giving parish councils expert advice on planning issues to influencing national and European policies, we work to protect and enhance the countryside.

We believe a beautiful, thriving countryside is important for everyone, no matter where they live. We don't own land or represent any special interests. Our members are united in their love for England's landscapes and rural communities, and stand up for the countryside, so it can continue to sustain, enchant and inspire future generations.

### Our objectives

We campaign for a sustainable future for the English countryside, a vital but undervalued environmental, economic and social asset to the nation. We highlight threats and promote positive solutions. Our in-depth research supports active campaigning, and we seek to influence public opinion and decision-makers at every level.

### Our values

- We believe that a beautiful, tranquil, diverse and productive countryside is fundamental to people's quality of life, wherever they live;
- We believe the countryside should be valued for its own sake;
- We believe the planning system should protect and enhance the countryside in the public interest.



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