

*Policy Guidance Note*

## **Onshore wind turbines**

### **Summary and introduction**

1. CPRE's aim is to protect the countryside. We recognise that onshore wind can contribute to meeting the UK's requirements for energy from renewable sources but wind turbines, if inappropriately sited, can also damage the natural beauty of the countryside and adversely affect the experience of residents and visitors. Where these competing environmental objectives conflict, the planning system has to arbitrate. There is a growing lack of confidence within rural communities in the planning system's ability to deliver fair and balanced outcomes. This risks undermining public support for measures to produce renewable energy and, consequently, to address climate change which is itself a threat to the countryside.

2. CPRE has always recognised that the countryside and its landscapes will change over time in response to human needs. The countryside as a source of energy is one such example. In principle, CPRE will accept wind turbine proposals where they are appropriately located, but will oppose proposals where the balance between energy output and landscape and amenity harm is judged to be unfavourable. This note explains how the planning system should enable such judgements to be made fairly and transparently.

### **The growth in onshore wind turbines**

3. Several factors have combined to drive the increase in the number of applications to erect onshore wind turbines. The following are particularly significant.

- a) The 2009 Renewable Energy directive sets a target for the UK to achieve 15% of its total energy consumption from renewable sources by 2020. The Government is also committed by the Climate Change Act 2008 to reduce greenhouse gas emissions by 80% by 2050.
- b) The 2011 UK Renewable Energy Roadmap outlines the planned contribution by eight key renewable energy technologies to meeting these targets. Based on an analysis of potential deployment scenarios provided by the industry, the government estimates that onshore wind could contribute up to around 13GW of capacity across the UK by 2020. The number of turbines implied by this target will vary according to the size of the turbines developers seek to build.
- c) Through charges on electricity consumers' energy bills, the Government channels financial support to renewable and low-carbon energy technologies to make them attractive to investors and help them compete alongside fossil fuels. This contributes to onshore wind being currently one of the least expensive renewable technologies to develop and operate which means it is favoured by investors.
- d) New planning guidance places greater emphasis on the planning system actively supporting renewable energy infrastructure, including onshore wind turbines, although it recognises the need to address cumulative landscape and visual impacts.<sup>1</sup>

<sup>1</sup> How development proposals are handled in the planning system depends on their installed capacity: those up to 50MW are determined by local planning authorities guided by Local Plans and by the National Planning Policy Framework published in March 2012; those over 50MW are determined by the Secretary of State, guided by the National Policy Statements on Energy Infrastructure EN-1 and EN-3 issued in July 2011. The NPPF replaces PPS22 *Renewable Energy*. At the time of writing the Companion Guide to PPS22 has not been revoked and is a material consideration in planning decisions.

4. Taken together, these policies have led to a dramatic increase in the number of onshore wind proposals entering the planning system. The Government has stated that most of the turbines required to meet the current 13 GW target are either already built, have received planning permission, or are awaiting planning permission.<sup>2</sup> How many more onshore wind proposals will come forward, however, remains uncertain because it is not guaranteed that all the current applications will be built.

#### **CPRE's approach to the siting of onshore wind turbines**

5. CPRE's objective is to protect rural England for the benefit of all. While onshore wind energy can make a contribution to achieving the policy targets identified above, CPRE believes this should not come at the expense of the beauty, character and tranquillity of rural England. CPRE campaigns for low-cost and low environmental impact measures leading to significant reductions in energy consumption, especially through improved transport policies, better planning and design of new development, and greater energy efficiency in existing buildings. Recognising that these measures alone will not go far enough, CPRE supports the development of renewable and low-carbon energy from a diverse array of technologies which have low environmental impact.

6. Wind turbines can, through their design and function, cause significant harm to the landscape by introducing (amongst other things): visual dominance and artificial conspicuous movement into the landscape and views of it; built development in undeveloped areas; vertical man-made structures affecting people's perceptions of tranquil or otherwise unspoilt areas. The high population density and the limited landscape capacity of England, together with the major landscape and visual impact of wind turbines, impose constraints on the extent of acceptable onshore wind turbine development. Decisions on the scale and location of wind turbine developments must be carefully controlled to minimise harm to all rural landscapes, residents and wildlife - not just in those areas designated as National Parks or Areas of Outstanding Natural Beauty.

7. Accordingly, planning policy for onshore wind turbines should be rooted in the following principles which should be taken as a whole when assessing the suitability of proposals to contribute to renewable energy targets.

(a) **Work within a locally accountable, strategic plan-led system** to steer wind turbine development to areas of least landscape sensitivity, taking account of community views. As part of the planning process, local planning authorities should utilise landscape character assessment in order to establish the relative capacity of landscape character areas to accommodate wind turbine development. Strategic Environmental Assessment and public consultation should be used to identify issues and help to resolve conflicts at an early stage, investigate alternative options, and ensure all relevant environmental issues are properly considered. Wind speed data will be relevant to an assessment. Plans should promote a diverse range of technologies (in line with the Roadmap) but should not set technology-specific targets for renewables as this could restrict the development of other more efficient, but currently less commercially attractive or viable, alternatives and result in an over-reliance on onshore wind, despite its potentially significant adverse impact on the landscape.

(b) **Protect the character of the countryside - its landscape, tranquillity, wildlife, heritage and amenity.** Wind turbines should be sensitively located to take account of their individual and cumulative impact on the countryside. Consideration should be given to both their simultaneous (within one field of vision) and sequential (as one travels through the landscape) impacts, and the impact of associated infrastructure. Landscape character assessment and associated studies should be used to determine what types and what scale of renewable energy generation can be accommodated in an area without threatening its distinctive landscape character or tranquillity.<sup>3</sup> CPRE is in principle opposed to proposals for wind turbine development which would cause harm to

<sup>2</sup> Statement by Secretary of State for Energy and Climate Change, House of Commons Debates (Hansard), 8 March 2012, col 997.

<sup>3</sup> Natural England has characterised 159 natural areas across England which are defined by a unique combination of landscape, biodiversity, geodiversity, and economic and cultural activity. More information can be found on their website (<http://www.naturalengland.org.uk/publications/nca/default.aspx>).

Areas of Outstanding Natural Beauty, National Parks, or their settings, in places where they would damage heritage sites, including the setting of historic cities, and in locally important areas<sup>4</sup> where they are judged to have an unacceptable impact on the landscape, tranquillity, wildlife, heritage and amenity.

(c) **Require proposals for wind turbines to be assessed on their individual merits.** There should be no planning policy presumption in favour of renewable energy development, or wind turbines in particular.<sup>5</sup> The application for wind turbine development should state predicted outputs of energy based on site-specific measured wind data (which should be supplied with the application). This will contribute to a detailed public understanding of the renewable energy benefits of the particular scheme as compared with any disbenefits. It will allow any energy gains to be properly weighed against adverse local environmental impacts. Statements of theoretical or general installed capacity alone are insufficient. When a screening decision is requested (as to whether a wind development should be subject to formal EIA procedures), local planning authorities should presume that where there is doubt about the scale and nature of environmental impact, an EIA will always be required. Where there is clearly no legal requirement for formal EIA, the planning authority should nevertheless ensure that its normal development control process requires submission and evaluation of detailed, specialist, environmental studies (conducted by suitably accredited and independent experts). The studies should cover all aspects of the proposal, including:

- cumulative impacts on the landscape (see (f) below);
- the visual and landscape impacts (even if cumulative impact is not an issue);
- the design and construction of associated development, such as access roads and transmission pylons; and
- all issues surrounding decommissioning.

This is by no means an exhaustive list. Other important issues include: the impacts on the wider natural and historic environments; the impacts on businesses, tourists and local people (for example, noise, light pollution and flicker, loss of outlook and overbearing impacts, disruption to rights of way and other access routes); and disturbance to wildlife. Incomplete applications which fail to provide relevant information should be rejected by the planning authority. If an incomplete application is progressed, the authority should seek evidence to substantiate claims made in the application. Such claims which require rigorous investigation often include:

- the claimed energy outputs and the supporting evidence (this is particularly important given that turbines perform on average at 25.2% of installed capacity<sup>6</sup> and bearing in mind the NPPF's emphasis on ensuring effective delivery of developments);
- the suitability of the location (see above);
- noise effects;
- community support, and the processes that were used to try and identify such support;
- consistency with local and national planning policies.

(d) **Require the onshore wind industry to take legal and financial responsibility for the removal of wind turbines and associated infrastructure from the landscape once they come to the end of their useful life.** Requirements for decommissioning wind turbines, once they stop working or when they reach the end of their useful life, including the removal of works, underground foundations and reinstatement of land to its original condition should be subject to a legal agreement between the landowner and developer. These should be linked to enforceable planning conditions and obligations, the latter including financial guarantees (e.g. bonds) to ensure that funds for reinstatement remain available despite changes of ownership or other changed circumstances. A turbine which consistently fails to deliver the estimated output assumed when planning permission was granted may well have reached the end of its "useful life" and should be removed.

<sup>4</sup> Locally important areas are best defined in Local Plans.

<sup>5</sup> In a legal challenge in May 2012 against a Planning Inspector's decision not to overturn the refusal of planning permission for a wind turbine, the High Court ruled that an Inspector was not required to give primacy to national policy over local policy; national and local policies are all relevant factors which should be balanced equally in the planning system.

<sup>6</sup> Source: DECC Regional renewable statistics, averaged over the period 1998-2010.

(e) **Engage local communities and secure public participation in planning for renewables.** Prior to making applications for wind turbine development, developers should be required to provide full information to the local communities affected and to elicit their views, to help identify and, if possible, resolve potential concerns. However, CPRE has serious concerns about the widespread practice of wind turbine developers offering ‘goodwill’ payments to local communities, which threatens to bring the planning system into disrepute. Nor is it consistent with good public policy to secure the support of the immediate local community through such payments when the development affects a landscape asset enjoyed by a much wider population including future generations. CPRE will support local communities campaigning for or against wind turbine proposals on grounds backed by this guidance note, especially if their views are not receiving proper consideration within the decision-making process.

(f) **Include full assessments of the cumulative impacts of wind turbine developments in the decision-making process.** Paragraph 97 of the NPPF requires local planning policies to take account of cumulative impacts. CPRE welcomes this recognition, but is concerned at the lack of practical guidance available to local planning authorities in England about how to carry out such assessments.<sup>7</sup> The localisation of planning policies following the removal of regional strategies, together with the increase in onshore wind applications, means that working across local authority boundaries to make assessments will be important.

#### How to exert influence locally

8. CPRE branches, their members and interested individuals can:

- a) **Influence Local Plans.** Local planning authorities are at different stages in the production of Local Plans, and there are opportunities to press for incorporation into them of the policy principles set out in this guidance note as part of a broader local renewable energy strategy. Several authorities have developed windfarm SPDs (Supplementary Planning Documents) and these have already been given weight in appeal decisions. SPDs can be used to define where and what type of development is acceptable. The CPRE booklet *Planning Explained* gives advice on procedures.
- b) **Comment on individual planning applications for wind turbines.** As well as the policy principles in this guidance note, Annex 1 of CPRE’s Renewable Energy campaign briefing identifies criteria on which you can base your assessment whether in support of, or opposition to, a proposal. You could also contact your local CPRE branch (see our website [www.cpre.org.uk](http://www.cpre.org.uk) for details or call 020 7981 2800), which may be commenting on wind turbine development in your area. The CPRE booklet *How to respond to planning applications: an 8-step guide* provides practical assistance.
- c) **Explore the use of Neighbourhood Plans.** Decisions on the acceptability and location of wind turbines are within the scope of the new Neighbourhood Plans, which your community may be drawing up under the Localism Act 2011. Neighbourhood Plan policies must be in conformity with the Local Plan. The CPRE booklet *How to shape where you live: a guide to neighbourhood planning* and the CPRE guide *Unlocking the Landscape* provides more information.
- d) **Form alliances.** Other local groups may have views about a particular proposal, such as the impacts on wildlife.

9. Links to CPRE county branch websites, some of which contain useful information to support local campaigning, can be found on the national CPRE website.

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<sup>7</sup> The guidance note on the cumulative effects of windfarms produced by Scottish Natural Heritage contains useful advice transferable to England. The Landscape Institute have Guidelines for Landscape and Visual Impact Assessment (GLVIA). Part of this assessment includes information on the sensitivity of visual receptors and views.