

South Downs National Park Authority

South Downs National Park Renewable Energy Study

Final report

Prepared by LUC

July 2024



South Downs National Park Authority

South Downs National Park Renewable Energy Study

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Chapter 1

Introduction

1.1 LUC was commissioned by the South Downs National Park Authority (SDNPA) to prepare a renewable energy study. This included three discrete elements of work including:

- 1.** Review of sites that were submitted in 'a call for sites process' for renewable energy development within the National Park (predominately solar and wind developments);
- 2.** Engagement with local stakeholders on renewable energy developments, specifically in relation to:
 - their general views on renewables within the National Park;
 - the key barriers and opportunities for implementation; and
 - the appetite and potential for community energy schemes.
- 3.** Review of potential Local Plan policy approaches to support appropriate community and small scale energy proposals within the South Downs National Park.

1.2 This work will be used by the National Park Authority to help inform the Local Plan Review covering the period 2022 to 2042.

Background

1.3 There is a clear need for additional renewable energy production in the UK, with current legislation aimed at transitioning the UK onto a path to net zero. The UK Government has committed to cut greenhouse gas emissions by 78% by 2035 and to achieve net zero by 2050 in line with the Zero Carbon Strategy. Strategic planning policy can contribute towards this commitment by positively supporting forms of renewable energy development over a plan period.

1.4 Local Planning Authorities are being encouraged to facilitate this transition to a low / zero carbon economy whilst ensuring development is responsible and contextual to sensitive locations such as National Parks. For the South Downs, the new Climate Change Strategy and Action Plan sets out a target committing the Authority to become a net zero organisation by 2030 to work towards the National Park becoming 'Net-Zero with Nature' by 2040. South Downs along with UK National Parks are ambassadors for the UN-backed Race to Zero - a coalition of non-state actors taking immediate action to halve global emissions by 2030 and build a greener,

fairer and healthier future. There is a need to generate power from renewable energy sources. Recognition of and understanding the purposes and special qualities that shape and guide the National Park Authority will be crucial in the development of its future relationship with renewable energy. The SDNPA Climate Change Action Plan includes the objective to work specifically with local communities to develop community energy schemes within the National Park, to support the transition to a low-carbon future whilst minimising the impact on the South Downs special qualities.

Structure of the report

1.5 The remainder of this report is structured as follows:

- **Chapter 2** sets out the site assessments for the 31 'call for sites'.
- **Chapter 3** describes the findings of the local stakeholder engagement.
- **Chapter 4** provides a review of the policy context in relation to renewable and low carbon energy and outlines potential planning policy options for the emerging Local Plan.
- **Chapter 5** summarises the study conclusions and next steps.

Chapter 2

Site Assessments

Introduction

2.1 Assessing what land may be available for future development is an important part of strategic planning. In order to involve local individuals and organisations in this process, the SDNPA sent out a public request in 2022 to identify sites within the National Park that may be potentially suitable for renewable energy development. This is known as a 'Call for Sites'.

2.2 Following receipt of the potential sites, the SDNPA commissioned LUC to assess 31 sites that were submitted through the 'Call for Sites' process. The sites were proposed for wind, solar farm or battery storage development (to note, one site was assessed for both wind turbines and a solar farm). The sites ranged in size from 0.2 hectares to 204 hectares. Some of the larger sites were split into smaller sections to identify any more or less suitable areas within the larger sites. LUC undertook a high-level desk-based assessment of the potential ecological, landscape, heritage and other planning issues associated with each site. Site visits were not part of the assessment undertaken by LUC. However, for sites REN_05, REN_09, REN_29 LUC was able to utilise additional site information provided by SDNPA that has led to further refinement of the assessment.

Methodology

2.3 For each topic, the potential impact of development on the site was assessed according to the following categories of sensitivity:

Table 2.1: Categories of Sensitivity

Category of Sensitivity	Description
Low	Site is likely to be suitable for development - development likely to be subject to relatively few and minor ecological, heritage, landscape and planning constraints.
Low to moderate	Site or part of the site may have potential for development subject to sensitive design and mitigation.

Category of Sensitivity	Description
Moderate	The nature, scale and form of development would be markedly influenced by the presence of ecological, heritage, landscape or planning constraints (e.g. the presence of ecological, heritage, landscape or planning constraints (e.g. the presence of priority habitats and species to be maintained as part of a wider functional network or heritage assets.) However, it is likely that further surveys and expert input during the design of the development could potentially facilitate some development within the site.
Moderate to high	Substantial constraint on the nature and/or scale of development anticipated, requiring substantial mitigation.
High	The site is unlikely to be suitable for development. Examples include the potential for the development to have significant negative impacts (direct or indirect) in relation to landscape and visual amenity, irreplaceable habitats or heritage assets etc.

2.4 The assessments were undertaken by technical specialists with experience of renewable energy developments. This included ecologists, heritage consultants, landscape planners and planners. The team undertook a comprehensive review of all relevant documents and databases as well as publicly available online GIS information relating to national/regional/local receptors to inform the appraisal. Professional judgement was applied to evaluate and in turn rate the sensitivity for the potential sites for wind, battery storage or solar farm development. The following section sets out the criteria and data sources used to inform the assessment of each topic.

Ecology

2.5 The following criteria were used to assess each site in relation to potential ecological impacts:

- International designations on site or within 5km (Approx. distance from site)?
- Within a Habitat Regulation Assessment (HRA) site buffer zone in SD10?
- National statutory designations on site or within 5km?
- Within a Site of Special Scientific Interest (SSSI) Impact Risk Zone (IRZ)?
- Non-statutory designations (Local Nature Reserve (LNR) or Local Wildlife Site (LWS)) on site or within 2km?
- Ancient woodland on site or within 100m?
- Local conservation sites on site or within 200m?
- Priority habitat (terrestrial and aquatic) on site or within 200m?
- National forest inventory (NFI) habitat on site or within 200m?
- Within a Biodiversity Opportunity Area (BOA), People and Nature Network - Natural Capital Investment area (NCIA) or ReNature site?
- Within a Nutrient Neutrality Catchment or Sussex North Water Resource Zone?
- Current habitat on site based on priority habitat datasets (national and local SDNP data)? (Where there are gaps, aerial imagery was used to supplement habitat data).
- Relationship of the site to the wider habitat context. Does the site sit within a larger parcel of the same habitat? Does the site form a supporting habitat of a broader landscape such as parkland?
- Could development have a potential impact on designations, priority habitat, other notable habitats?
- Could development have a potential impact on protected and notable species, or habitat connectivity?
- Are there any Tree Protection Orders (TPOs) within or on the boundaries (within 30m for individual trees or within 100m for woodlands) of the site?

Heritage

2.6 The following criteria were used to assess each site in relation to potential heritage impacts:

- Are there any scheduled monuments within the site that will experience physical impact as a result of the development?
- Are there any scheduled monuments that have the potential to experience changes to their setting as a result of the development?
- Are there any listed buildings within the site that will experience physical impact as a result of the development?
- Are there any listed buildings that have the potential to experience changes to their setting as a result of the development?
- Is the site within a registered historic park and garden?
- Are there any registered parks and gardens that have the potential to experience changes to their setting as a result of the development?
- Is the site within a registered battlefield?
- Are there any registered battlefields that have the potential to experience changes to their setting as a result of the development?
- Is the site within a conservation area?
- Are there any conservation areas that have the potential to experience changes to their setting as a result of the development?
- Are there any non-designated assets within the site that will experience physical impact as a result of the development?
- Are there any non-designated assets that have the potential to experience changes to their setting as a result of the development?
- What is the archaeological potential of the site?
- What is the historic character of the landscape and what is the potential for it to experience change as a result of the development?
- Are there any other sites that have the potential to result in cumulative effects?

Landscape

2.7 The following criteria was used to assess each of the sites in relation to landscape issues:

- Which Landscape Character Assessment (LCA) (2020) area does the Site within?
- Which key characteristics of the LCA are reflected in the Site?
- Description of the landform (topography) of the Site.
- Description of the land cover pattern and scale of the Site.
- Description of the historic landscape character of the Site.
- Description of the natural/semi-natural character of the Site.
- Description of the visual character of the Site.
- Description of the perceptual qualities (including sense of openness/enclosure) of the Site.
- Description of scenic and special qualities (including potential impacts on Special Qualities of the National Park).

Planning

2.8 Each site was assessed against various additional issues relevant to planning. The issues are set out below:

- What is the distance to the nearest grid connection point: line or substation?
- Does at least 80% of the site have a gradient of <7°?
- Is the site bisected by any pylons, cables or pipelines?
- In relation to wind development, is the site within 800m of a sensitive receptor?
- In relation to battery storage development, is the site within 800m of residential properties?
- What is the number of renewable energy sites (consented and operational) within 500m of the site?
Number of solar sites (consented and operational) within 2km (Low: 0-1, Moderate: 1-2, High: 3+)
- Is there a water body (pond etc.) or watercourse (river, stream, ditch etc.) within or adjacent to the site? Please describe the feature (e.g. River, stream, ditch, lake, pond) stating whether it is within or adjacent.
- Is the site fully or partially within Flood Zone 2 or 3? If yes, approximately what percentage of the site is impacted and does it benefit from flood defences?
- Is the site within a groundwater protection zone?

- Is the site fully or partially within a Mineral Safeguarding Area? If yes, approximately what percentage of the site is within these designations?
- Is the site fully or partially within a public open space?
- Is the site in agricultural use or comprised of Best and Most Versatile (BMV) land? If yes, approximately what percentage of the site is within Grades 1-3a (to the nearest 10%)?
- For solar development, is the site within 1km of any light sensitive receptors i.e. aviation, roads, rail infrastructure and residential properties?
- Are there any access issues along the most likely component delivery route (i.e. from the nearest port or Strategic Road Network). E.g. roads with weight restrictions, low bridges etc.
- Could the site access impact the Strategic Road Network?
- Is there an existing safe access to the site? (e.g. does the access have appropriate visibility splays and junction radii)
- Are additional works needed to enable safe access?
- If no access exists, are the opportunities to create access?
- Are there any other potential site access issues?
- Are there any public rights of way running through the site or around the boundary of the site and could the site impact these?
- Are there sustainable transport opportunities for staff access to the site?
- Do any Green Infrastructure Corridors run through the site?

Limitations

2.9 The following limitations apply to the study:

- The assessment is a high-level desk-based exercise only. Further detailed site surveys and assessments would be needed to verify the findings of this assessment.
- No site work or surveys were undertaken.
- EIA screening and consultation with relevant statutory stakeholders would be required.
- Ecology: The assessment has not considered species or habitat data from the local biological centre.

- The assessment does not conclude which sites should be allocated. The allocation of sites for future development will be determined through either the South Downs Local Plan Review or Neighbourhood Development Plans. The assessment conclusions of this study do not imply that planning permission would be granted for development. Determination of planning applications will require a greater level of detail and understanding of the site constraints. Communities and applicants cannot rely on the findings or conclusions in this report in isolation.

Results

2.10 The results of the assessment of sites are set out in an accompanying excel spreadsheet. The site assessments found that:

- Four were rated as having low to moderate sensitivity to development.
- Four were rated as having moderate sensitivity to development.
- 18 were rated as having moderate to high sensitivity to development.
- Six were rated as having high sensitivity to development.

2.11 As outlined above, this assessment is a high level desk based assessment. If the National Park Authority decide to proceed with the potential allocation with the Local Plan of any of these sites further site surveys and analysis will be required. Further work will also be required to establish if there are viable grid connection options for the sites.

Chapter 3

Stakeholder Engagement

Introduction

3.1 This chapter summarises the outputs of the stakeholder engagement process carried out as part of the Renewable Energy Study. The consultation was undertaken to understand the views of local stakeholders on renewable energy development within the National Park.

3.2 Engagement with the relevant stakeholders was undertaken via an online consultation hub which incorporated an interactive map and survey.

3.3 Prior to preparing the survey questions LUC consulted with Energise South Downs (ESD) to understand the work they are currently undertaking to ensure that our work aligned with theirs. Once the consultation hub was made live, it was sent to Parish Councils, Climate Action Groups within the area and ESD's members. It was also included within the SDNPA newsletter.

3.4 This chapter sets out a summary of key points raised by the stakeholders via the online survey.

Components of engagement process

Online Survey

3.1 An online survey was opened between March and May 2024. It was made available to key stakeholders with an interest in renewable energy infrastructure. As outlined above, stakeholders included:

- Parish Councils.
- Climate Action Groups.
- Energise South Downs.

3.2 The link to the consultation hub was also sent out in the SDNPA newsletter.

3.3 In total, 40 responses were received from the online survey.

Interactive Map

3.4 A link to an interactive map was sent out along with the online survey, on the same date and to the same stakeholders. The map allowed stakeholders to leave points on a map within any area of the South Downs National Park (SDNP) where they think there may be potential for renewable

energy development. Stakeholders were asked to leave comments relating to the points on the map.

3.5 In total, 20 points were plotted on the map.

Online Survey

3.6 This section goes into further detail regarding the responses received from the online survey.

Comments on renewable energy infrastructure

3.7 Stakeholders were asked to comment on renewable energy developments within the SDNP, specifically in relation to three areas. These areas were:

- General views on renewables.
- Barriers and opportunities for implementation.
- Community energy schemes.

3.8 The stakeholder responses in relation to each of these areas were as follows.

General views on renewables

On a scale of 1 to 10 how important do you think it is to switch to renewable energy to assist with combatting climate change? 1 = not important to 10 = very important

3.9 There were 39 responses to this question. The mean answer was 9.2. This suggests that the respondents, on average, believe that switching to renewable energy is very important for combating climate change. This is close to the maximum score of 10, reflecting a strong consensus.

On a scale of 1 to 10 how appropriate do you think the following technologies are within the South Downs National Park? 1 = inappropriate and then 10 = very appropriate

Wind turbines

3.10 There were 39 responses to this question. The mean answer was 5.3. This suggests a mixed view on the appropriateness of wind turbines in the South Downs National Park. The average response is slightly above the midpoint of 5, indicating a slight tilt towards appropriateness but not overwhelmingly so.

3.11 Open-ended responses concerning wind turbines included the following key points:

- Prefer discreet turbines on roof ridges instead of towers.
- Place on hilltops if necessary.
- Investigate smaller turbine designs and assess wind conditions.

- Minimise visual intrusion and avoid inefficient placements requiring new grid infrastructure.

Solar farm (i.e. solar panels mounted on the ground in a field)

3.12 There were 39 responses to this question. The mean answer was 6. This suggests a generally positive view on the appropriateness of solar farms in the South Downs National Park. The average response is slightly above the midpoint of 5, indicating that respondents tend to view solar farms as more appropriate than inappropriate.

3.13 There were no open-ended responses in relation to solar farms.

Solar panels on roofs

3.14 There were 40 responses to this question. The mean answer was 9.2. This suggests that the respondents overwhelmingly consider solar panels on roofs to be very appropriate within the South Downs National Park. This high average score is close to the maximum of 10, reflecting a strong consensus.

3.15 Open-ended responses concerning solar panels / farms included the following key points:

- Install on unused flat land, rooftops of public and commercial buildings and car parks to avoid compromising wildlife and productive agricultural land.
- Ensure installations are away from protected views and sensitive ecological areas.
- Use in places unsuitable for farming to maintain agricultural productivity and promote biodiversity with proper land management.

Heat pumps (ground or air)

3.16 There were 39 responses to this question. The mean answer was 9.2. This suggests that the respondents overwhelmingly consider heat pumps to be very appropriate within the South Downs National Park. This high average score is close to the maximum of 10, reflecting a strong consensus.

3.17 There were no open-ended responses in relation to heat pumps.

Small scale hydro

3.18 There were 36 responses to this question. The mean answer was 6.9. This suggests a generally positive view on the appropriateness of small scale hydro in the South Downs National Park. The average response is slightly above the midpoint of 5, indicating that respondents tend to view small scale hydro as more appropriate than inappropriate.

3.19 There were no open-ended responses in relation to small scale hydro.

Biomass crops such as miscanthus, short rotation coppice, poplar

3.20 There were 39 responses to this question. The mean answer was 6.8. This suggests a generally positive view on the appropriateness of biomass crops within the South Downs National Park. This average score is above the neutral midpoint of 5, indicating that respondents tend to view biomass crops as more appropriate than inappropriate.

3.21 There were no open-ended responses in relation to biomass.

Biomass use of woodland residues

3.22 There were 39 responses to this question. The mean answer was 7.3. This suggests that respondents view the use of biomass from woodland residues as quite appropriate within the South Downs National Park. This score is above the midpoint of 5, indicating that the majority of respondents leaned towards viewing this technology as appropriate.

3.23 Open-ended responses concerning biomass included the following key points:

- Promote sustainable use of woodland residues without large facilities or importing materials.
- Avoid biomass crops with negative biodiversity and carbon impacts.
- Address concerns about methane emissions and carbon footprints potentially higher than the fossil fuels they replace.

Anaerobic Digestion

3.24 There were 39 responses to this question. The mean answer was 7.5. This suggests that respondents view the use of anaerobic digestion as quite appropriate within the South Downs National Park. This score is above the midpoint of 5,

indicating that the majority of respondents leaned towards viewing this technology as appropriate.

3.25 One open-ended response concerning biomass included the following:

- Highlight the importance of avoiding pollutants from anaerobic digestion processes.

Battery Storage

3.26 There were 39 responses to this question. The mean answer was 8.1. This suggests that respondents overwhelmingly view battery storage as highly appropriate within the South Downs National Park. This score is significantly above the midpoint of 5, indicating strong support for this technology.

3.27 One open ended response concerning biomass included the following:

- Consider the environmental impact of battery storage and the potential use of recycled batteries.

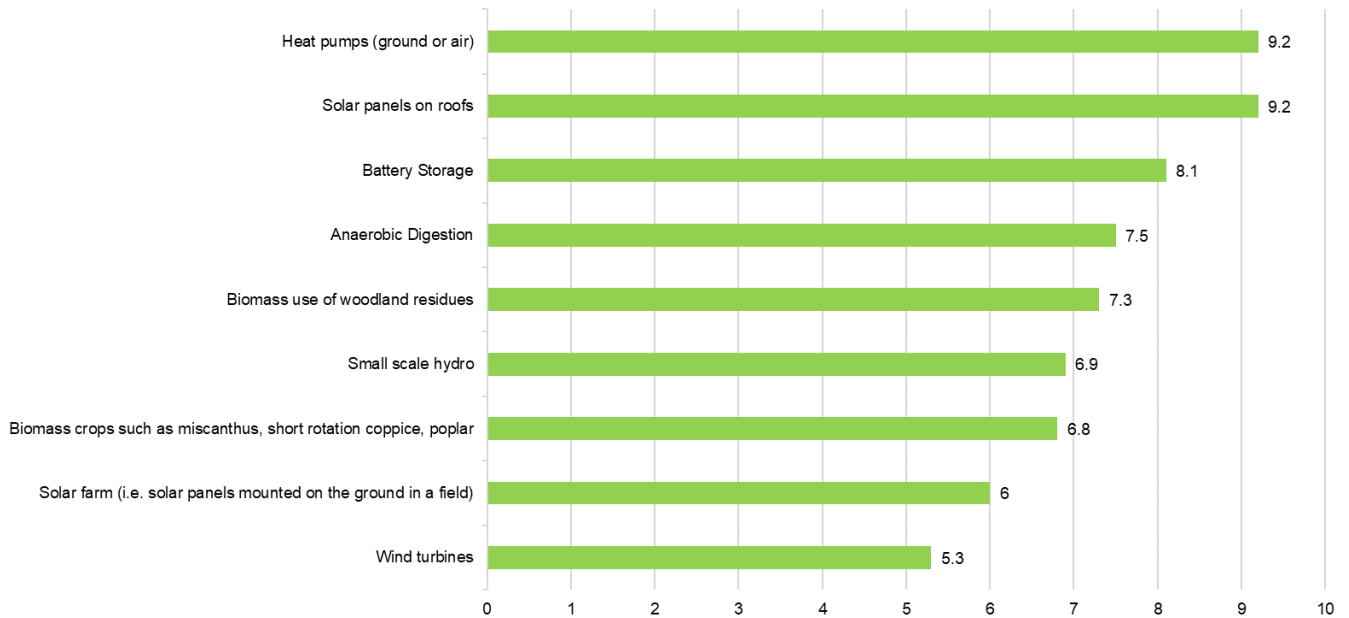
General renewable energy considerations

3.28 Other general open-ended responses relating to renewable energy generation included the following key points:

- Prioritise technologies that do not compromise the visual and environmental qualities of the SDNP.
- Ensure renewable energy projects align with the Parish Priority Statement.
- Consider the carbon intensity and whole life cost of technologies.
- Include heat pumps and EV charging points.
- Suggest mini nuclear reactors as a potentially more efficient option.
- Encourage renewable energy integration in new builds and the use of non-agricultural land for energy projects.

Figure 3.1: Rating for each renewable type in SDNP

Rating for each renewable energy type in SDNP (1 = inappropriate and 10 = very appropriate)



Barriers and opportunities for implementation

What do you consider to be the top two barriers (i.e. factors that may limit the development coming forward) for each technology listed below? We have provided some examples of barriers for you to choose from, but please feel free to add additional barriers as you see fit.

Wind turbines

3.29 There was a total of 39 responses to this open-ended question. Key points include:

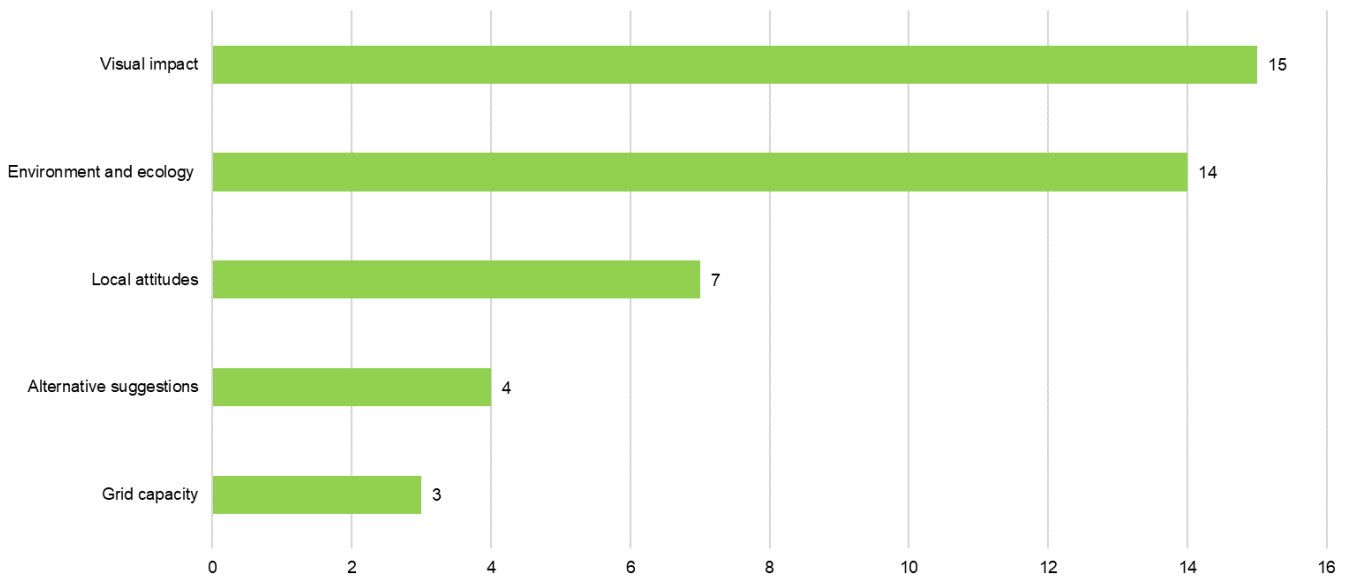
- Visual impact:
 - Concerns about the visual impact of wind turbines on the landscape.
 - Preference for small, individual, discreet ridge blades to minimise visual intrusion.
 - Residents were generally against the visual impact of large wind turbines.
- Environment and ecology:
 - Suggestions to consider the landscape sensitivity and the effect on natural ecology and biodiversity.
 - Concerns about noise impact on livestock and wildlife, including bats, birds and sheep.
- Local attitudes:
 - Notable local resistance (NIMBYism) to wind turbines due to visual and environmental concerns.
 - Some respondents feel that press coverage is biased and that underfunding of grid access and overemphasis on visual impact hinders progress.
- Alternative suggestions:
 - Offshore wind turbines were favoured for being more efficient and less intrusive.
 - Encouraging the use of farm-sized turbines and placing turbines in industrial or commercial sites rather than sensitive landscapes.
 - Promotion of private generation schemes and updating limits on electricity export to support local energy initiatives.
- Grid capacity:
 - A lack of grid capacity in the area was raised as a barrier limiting development.
- Specific locations mentioned:
 - South Harting, Lewes, West Meon, Petersfield and Angmering were identified as areas with specific concerns or barriers for renewable energy projects.

3.30 The quantified responses are depicted in **Figure 3.2** below. It is important to note that in the figure below, the total count of 39 responses cannot be reached due to overlaps in answers across categories or instances of unusable

responses. The figure does however accurately represent the frequency of key points raised in the feedback received. This is true for **Figures 3.2 to 3.10** in this section.

Figure 3.2: What do you consider to be the top two barriers (i.e. factors that may limit the development coming forward) for wind turbines?

What do you consider to be the top two barriers (i.e. factors that may limit the development coming forward) for wind turbines?



Solar farm (i.e. solar panels mounted on the ground in a field)

3.31 There was a total of 36 responses to this open-ended question. Key points include:

- Visual impact:
 - Concerns about the visual impact of solar panels on the landscape.
 - Emphasis on minimising visual impact through careful design and location.
- Environment and ecology:
 - Sensitivity to landscape and environmental impacts, especially in the setting of the SDNP.
 - Potential negative effects on SSSIs are noted.
- Planning and policy challenges:
 - Lack of supportive planning policies and myths around renewable energy are seen as barriers.
- The need for improved grid capacity and connection to support local renewable energy projects.
- Calls for more local initiative and supportive planning from authorities.
- Importance of land management policies that prioritise biodiversity when rolling out renewable energy projects.
- Use of agricultural land:
 - Concerns about the loss of productive agricultural land to solar farms. It is suggested that roofs for solar panels is a viable alternative.
 - Preference for using barren land or grade 3 agricultural land not visible from Public Rights of Way (PRoWs).
 - Dual use of fields for both energy generation and grazing livestock is suggested as a viable option.
- Economic considerations:
 - Upfront costs of installations are a concern.

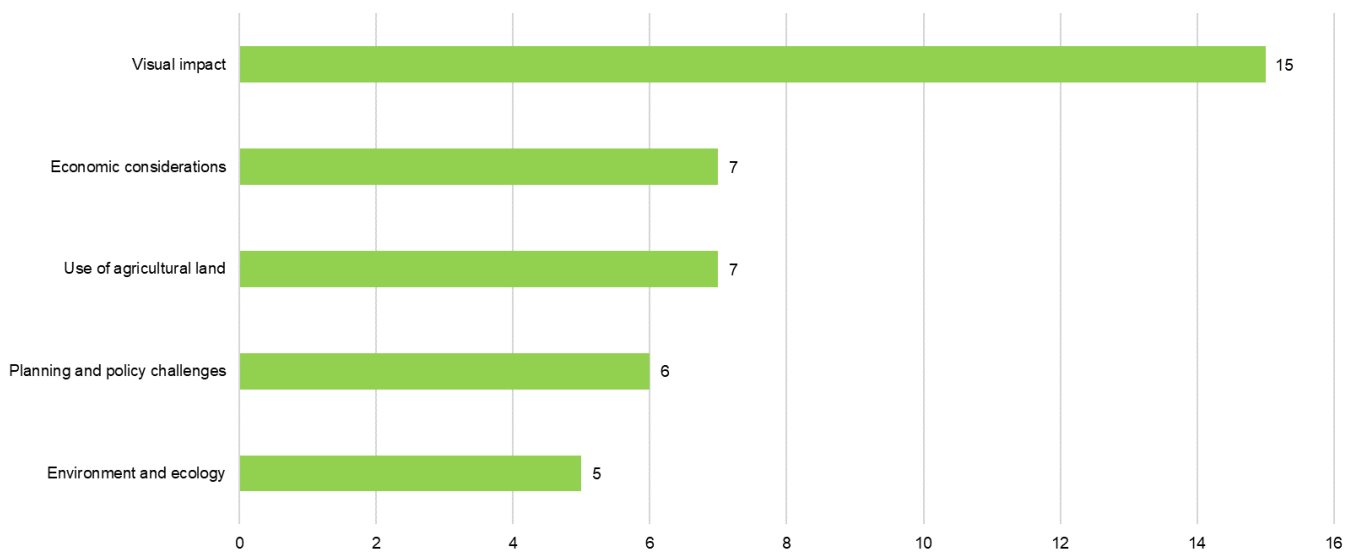
- The need for solar projects to be economically viable, including considerations for battery storage and exporting excess energy.
- Angmering highlighted, with particular concerns about visual impact and the use of agricultural land.

■ Specific locations mentioned:

3.32 The quantified responses are depicted in **Figure 3.3** below.

Figure 3.3: What do you consider to be the top two barriers (i.e. factors that may limit the development coming forward) for solar farms?

What do you consider to be the top two barriers (i.e. factors that may limit the development coming forward) for solar farms?



Solar panels on roofs

3.33 There was a total of 35 responses to this open-ended question. Key points include:

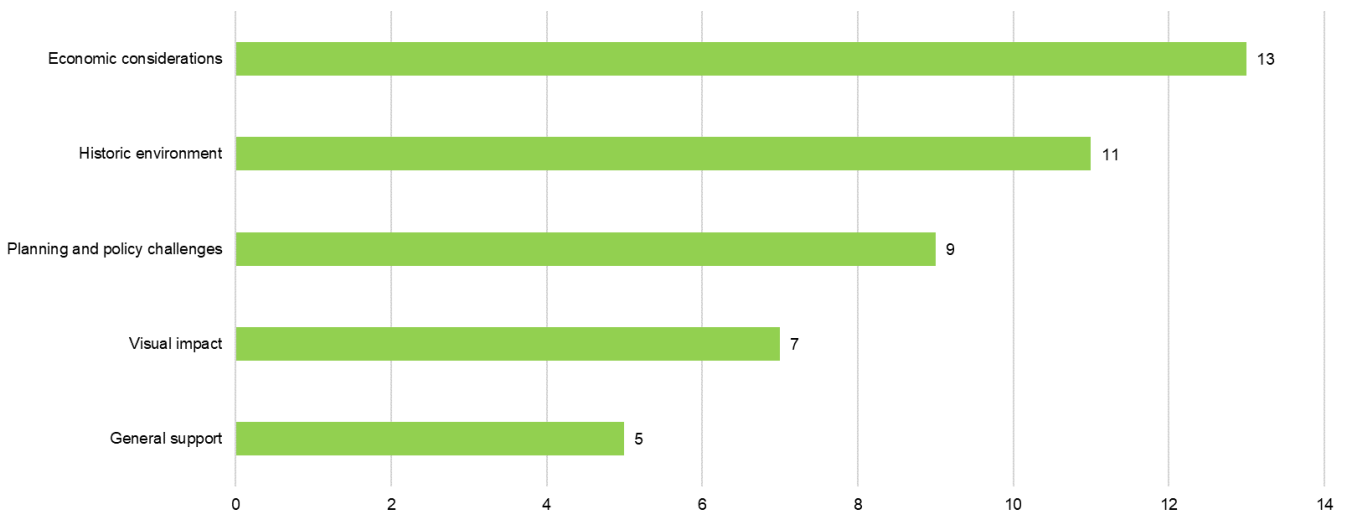
- Economic considerations:
 - Upfront costs of installing solar panels are a concern.
 - Payback periods and cost-effectiveness need to be considered.
- Historic environment:
 - Potential structural issues with old roof structures.
 - Need to preserve the aesthetic and structural integrity of historic buildings and conservation areas, however other responses suggest conservation area and listed building restrictions make installations challenging.
 - New technologies, such as solar tiles, could be more suitable for historic buildings and should be considered.
- Planning and policy challenges:
 - Lack of supportive planning policies and local initiatives is a major barrier.
 - Suggestions to revise planning policy to require solar panels on roofs with sufficient surface area.
- Visual impact:
 - Some local opposition due to concerns about visual unattractiveness.
 - Need to preserve the visual amenity, especially if installations are visible from public roads and footpaths.
- General support for solar panels:
 - Encouragement of solar panels on non-historic roofs, farm buildings, commercial buildings and car parks. Even on historic buildings, if done sensitively.
 - The view that all new developments should maximise solar panel use.

- Solar panels are seen as increasingly affordable, efficient and low maintenance, warranting policy support.

3.34 The quantified responses are depicted in **Figure 3.4** below.

Figure 3.4: What do you consider to be the top two barriers (i.e. factors that may limit the development coming forward) for solar panels on roofs?

What do you consider to be the top two barriers (i.e. factors that may limit the development coming forward) for solar panels on roofs?



Heat pumps (ground or air)

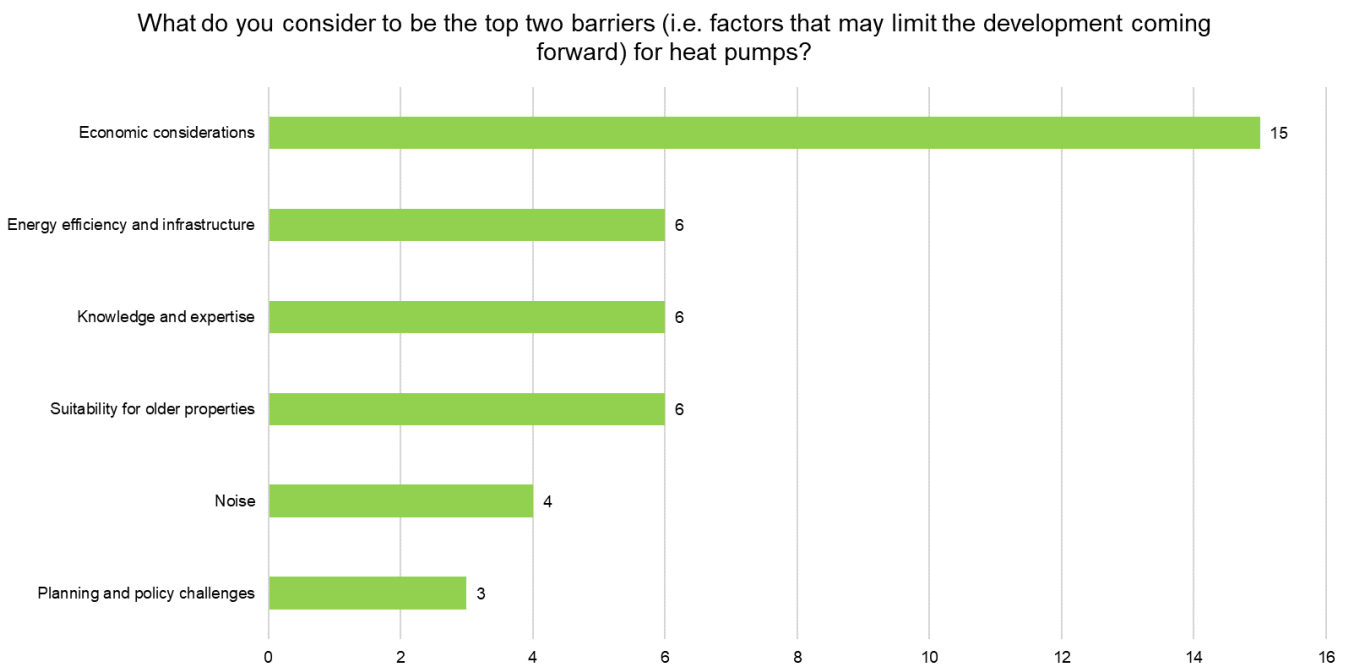
3.35 There was a total of 32 responses to this open-ended question. Key points include:

- Economic considerations
 - High upfront costs as a barrier to adoption.
 - Concerns about the return on investment.
 - Need for subsidies and financial incentives to make retrofitting more affordable.
- Suitability for older properties
 - Limited applicability for existing and older homes, especially those with poor insulation. Suggested that existing homes may need significant upgrades to be compatible with heat pump technology.
 - Difficulties in retrofitting due to existing heating systems that are not compatible with heat pumps.
 - Historic properties often lack the external space required for installations.
- Knowledge and expertise
 - Lack of awareness and understanding about heat pumps.
 - Media misinformation and negative publicity contribute to suspicion of the technology.
 - Educational efforts are needed to improve public perception.
 - Lack of qualified installers and limited installation capacity.
 - Need for more group buying schemes and experienced professionals to facilitate retrofitting.
- Noise
 - Noise concerns associated with heat pump operation.
- Energy efficiency and infrastructure
 - Heat pumps require a significant amount of electricity, which could necessitate more infrastructure (e.g., pylons and overhead cables).
 - Focus on improving building insulation to enhance heat pump efficiency.

- Grid decarbonisation is essential to maximise the environmental benefits of heat pumps.
- Planning and policy challenges
 - Lack of supportive planning policy for heat pump installation.
- Heat pumps are more suitable for new builds, but regulatory changes could help support retrofitting in older properties.

3.36 The quantified responses are depicted in **Figure 3.5** below.

Figure 3.5: What do you consider to be the top two barriers (i.e. factors that may limit the development coming forward) for heat pumps?



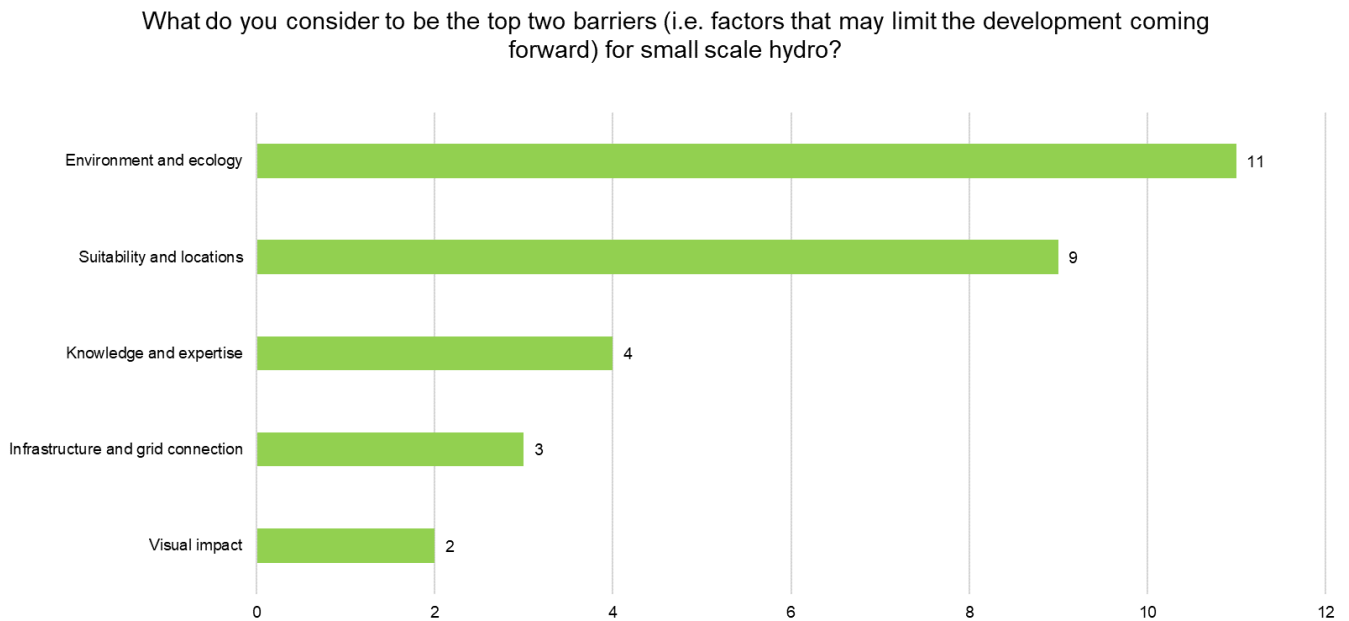
Small scale hydro

3.37 There was a total of 34 responses to this open-ended question. Key points include:

- Visual impact:
 - Concerns about landscape and visual impacts.
- Environment and ecology:
 - Potential negative impacts on hydrology, aquatic wildlife and ecology, including voles.
 - Environmental sensitivity and the current threat to rivers from issues like sewage discharge.
- Suitability and locations:
 - General lack of suitable locations and disruption concerns.
- The Arun was mentioned as a potential site, but with caution about negative impacts.
- Knowledge and expertise:
 - A lack of expertise and understanding about hydro projects.
 - Uncertainty about potential negative impacts and the feasibility of small-scale solutions.
- Infrastructure and grid connection:
 - Challenges with grid connection and investment costs.
 - Some support for small-scale, non-intrusive solutions like Archimedes screws, though with limited output.

3.38 The quantified responses are depicted in **Figure 3.6** below.

Figure 3.6: What do you consider to be the top two barriers (i.e. factors that may limit the development coming forward) for small scale hydro?



Biomass crops such as miscanthus, short rotation coppice, poplar

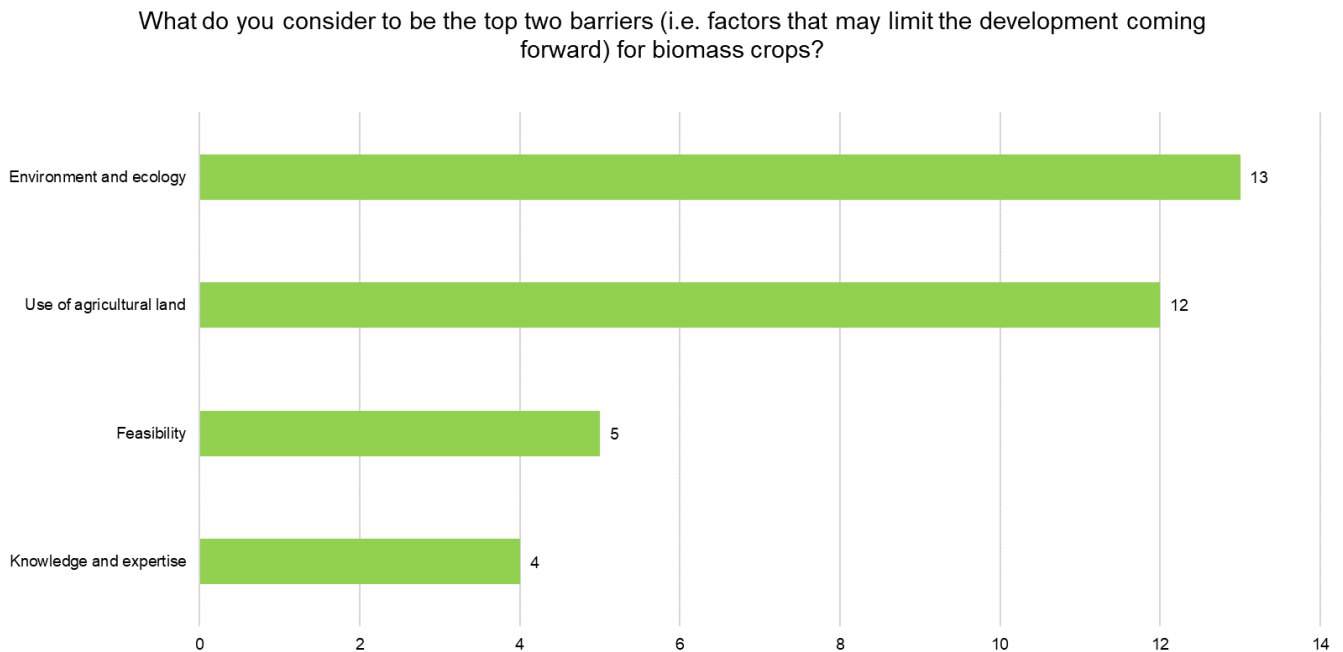
3.39 There was a total of 32 responses to this open-ended question. Key points include:

- Environment and ecology:
 - Widespread concern about the negative environmental impacts of monoculture, including reduced biodiversity and ecological sensitivity.
 - Apprehension about air quality issues associated with biomass installations, questioning its validity as a 'green' solution.
- Use of agricultural land:
 - Concerns about the use of agricultural land for biomass instead of food crops, potentially leading to food supply issues and increased importation of produce.

- Knowledge and expertise:
 - A common theme of insufficient knowledge and clear information about biomass energy.
 - Some responses indicated a need for more development and support to fully understand and utilise biomass energy.
- Feasibility:
 - Doubt about the significant contribution of biomass to energy requirements, with views that it might be more appropriate at a small, local scale.
 - A few responses recognised a large, underutilised potential for biomass energy, suggesting it could be a good use of the landscape with low visual impact.

3.40 The quantified responses are depicted in **Figure 3.7** below.

Figure 3.7: What do you consider to be the top two barriers (i.e. factors that may limit the development coming forward) for biomass crops?



Biomass use of woodland residues

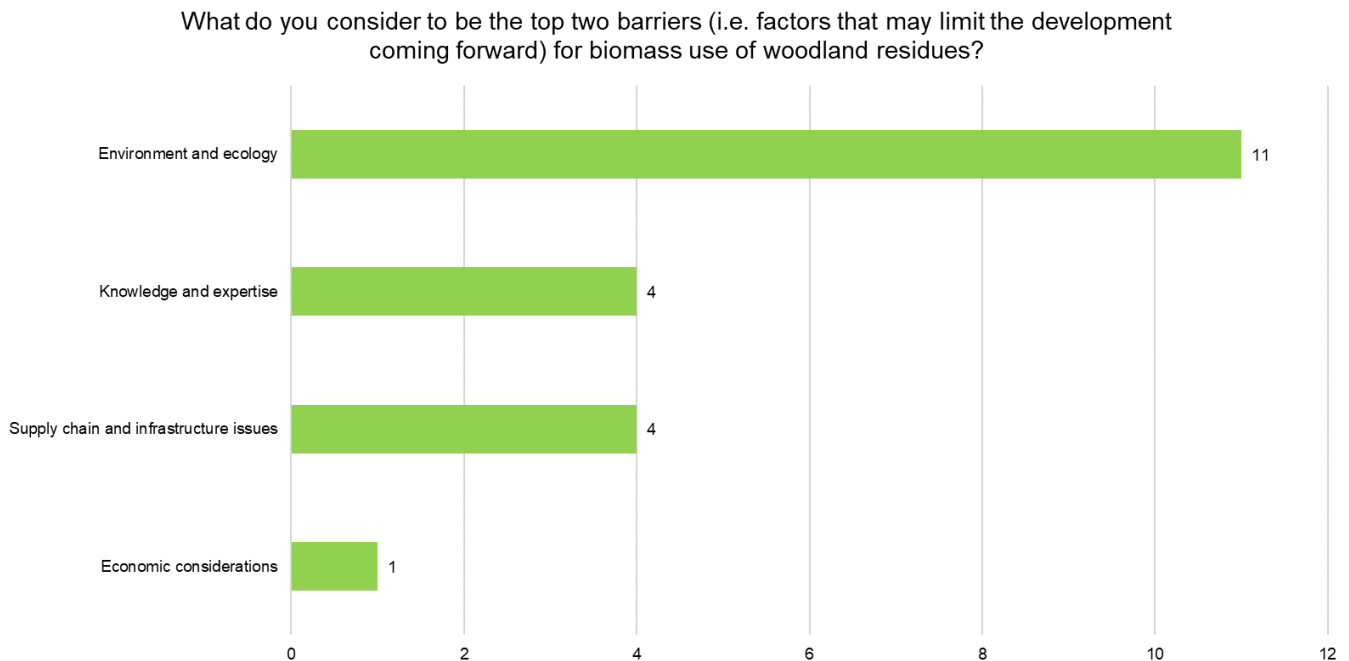
3.41 There was a total of 33 responses to this open-ended question. Key points include:

- Environment and ecology:
 - Concerns about potential air pollution, particularly particulates, making biomass less appealing as a 'green' solution.
 - Worries about the impact on biodiversity and the natural habitat if biomass is not managed correctly.
 - Doubt about the overall carbon efficiency of biomass, especially at larger scales due to harvesting and transportation impacts.
- Supply chain and infrastructure issues:
 - Mentions of a weak supply chain which could hinder the effective implementation of biomass energy.
 - Concerns about the impact of transporting biomass on rural roads and the environment, indicating logistical challenges.

- Knowledge and expertise:
 - A common theme of insufficient awareness and knowledge about biomass energy and its benefits.
 - A call for better information and support to increase understanding.
- Economic considerations:
 - Concerns about the economic viability of biomass, including the costs related to air quality control and efficient operation.
- Potential and recommendations:
 - Some see potential in using redundant woodlands and reserves, such as those in the SDNP and Charlton Forest, if managed properly with replanting programs.
 - References to successful biomass projects, like those used by the Duchy of Cornwall in Lostwithiel, which could serve as models for implementation.

3.42 The quantified responses are depicted in **Figure 3.8** below.

Figure 3.8: What do you consider to be the top two barriers (i.e. factors that may limit the development coming forward) for biomass use of woodland residues?



Anaerobic Digestion

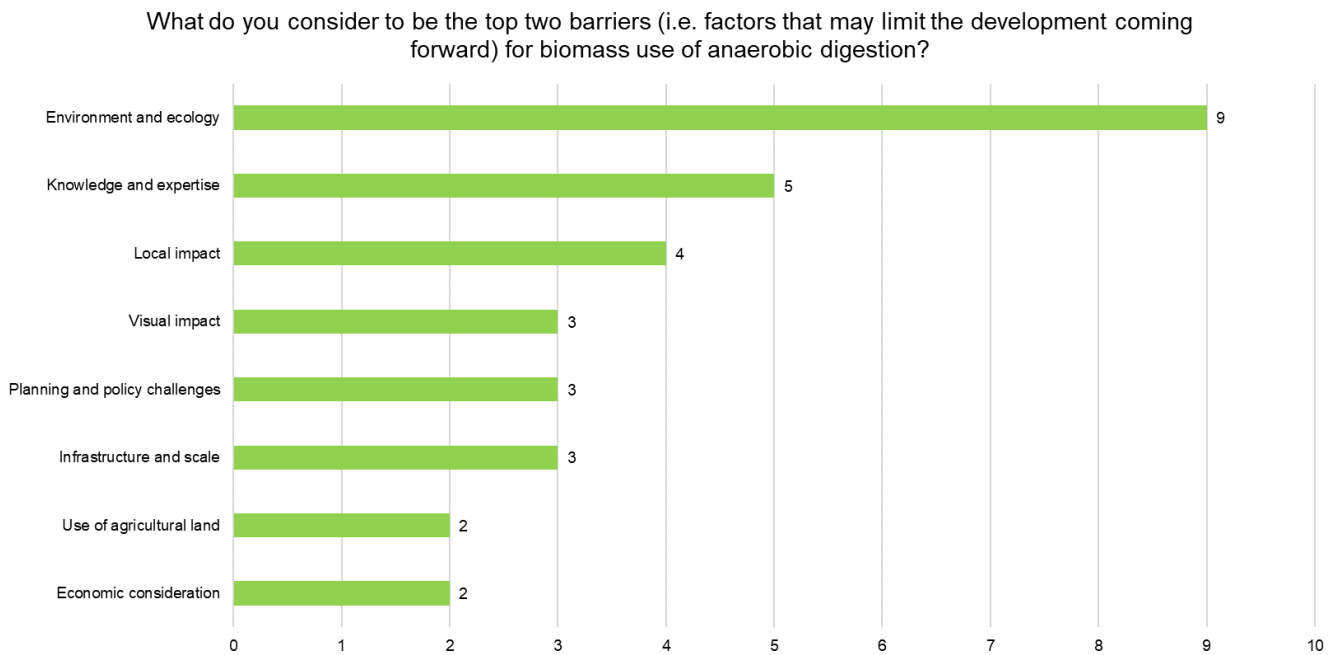
3.43 There was a total of 32 responses to this open-ended question. Key points include:

- Environment and ecology:
 - Potential adverse effects on the local ecology, particularly if implemented at a large scale.
 - Fears about air, ground and water pollution, including from methane generation.
- Visual impact:
 - Concerns about the visual impact on the landscape, potentially affecting views.
- Knowledge and expertise:
 - Lack of knowledge and understanding about anaerobic digestion among respondents.
- Economic considerations:
 - Concerns about the costs associated with anaerobic digestion infrastructure.
 - Questions about the overall efficiency of anaerobic digestion as a technology.
- Use of agricultural land:
 - Concern over the diversion of land from food crops to energy crops, with some viewing this as a potential issue.
- Infrastructure and scale:
 - Concerns about the large scale required for effective anaerobic digestion and the associated impacts.
 - Suggestions to utilise existing, redundant farm buildings for anaerobic digestion plants.
- Planning and policy challenges:
 - Need for supportive planning policies to facilitate the implementation of anaerobic digestion.
 - Call for government subsidies to help kickstart anaerobic digestion projects.
- Potential and recommendations:
 - References to successful and widespread use of anaerobic digestion in countries like Germany.
 - Seen as a good option for processing farm residues, though concerns remain about the disposal of waste products.
- Local impact

- Specific local cases referenced, such as Crouchlands, highlighting ongoing environmental risks and the need for remediation.
- Potential issues related to smell and sensory impact on nearby populations.

3.44 The quantified responses are depicted in **Figure 3.9** below.

Figure 3.9: What do you consider to be the top two barriers (i.e. factors that may limit the development coming forward) for biomass use of anaerobic digestion?



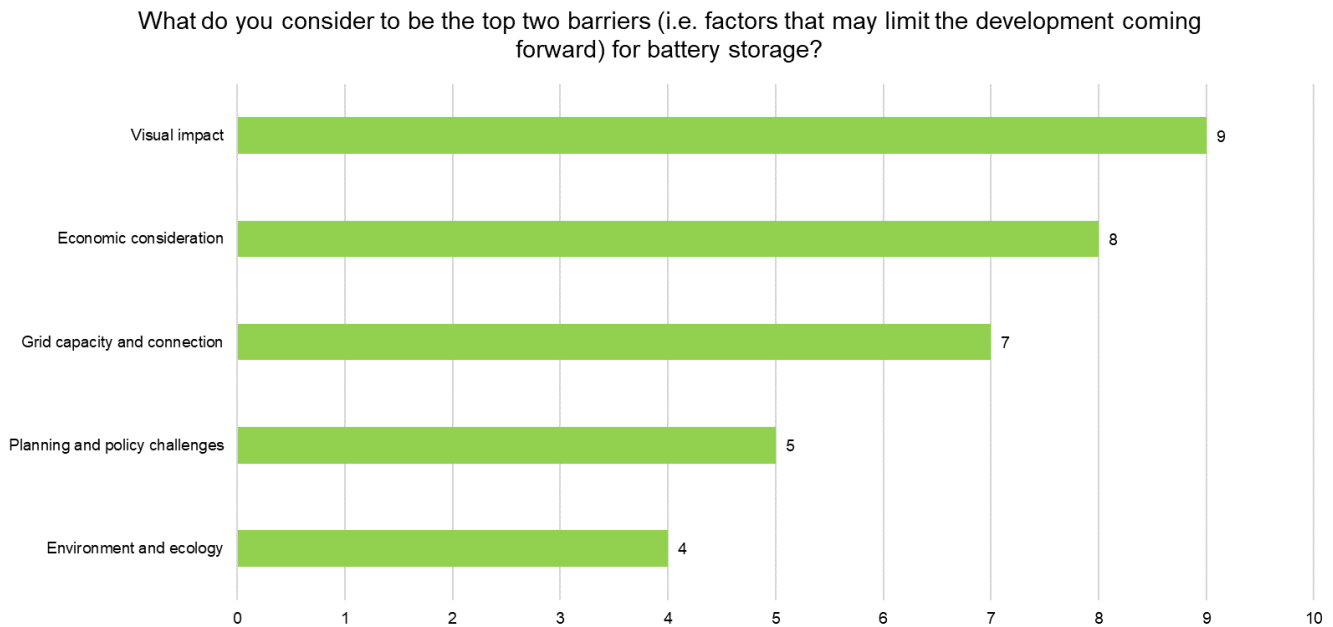
Battery Storage

3.45 There was a total of 33 responses to this open-ended question. Key points include:

- Economic considerations:
 - Concerns about the upfront and long-term costs of battery storage.
 - Questions about the sustainability of recycling costs for batteries at the end of their life.
- Grid capacity and connection:
 - Challenges related to connecting battery storage to the grid.
 - Concerns about whether the current grid can handle the additional capacity needed for battery storage.
- Planning and policy challenges:
 - Need for better planning policies to support the implementation of battery storage.
- Visual impact:
 - Proposals to locate battery storage in existing industrial sites to minimise visual and environmental impact.
 - Potential negative impact on landscape character and visual amenity.
 - The need for battery storage to be placed in a visually sensitive way to minimise landscape impact.
- Environment and ecology:
 - Potential impact on natural resources and water sources.
 - Issues related to the efficiency of battery storage and its environmental footprint.

3.46 The quantified responses are depicted in **Figure 3.10** below.

Figure 3.10: What do you consider to be the top two barriers (i.e. factors that may limit the development coming forward) for battery storage?



What do you consider to be the key opportunities or benefits that can be delivered by these technologies?

3.47 There were 39 responses to this open-ended question. Responses reflected a broad recognition of the environmental, economic and social benefits of renewable energy technologies. Key points include:

Social

- Community Benefits and Energy Resilience
 - Community energy schemes can provide cheaper energy and enhance resilience during power outages.
 - Local energy production promotes community involvement and can lower local energy prices.
 - Renewable energy projects can create local employment opportunities.
- Educational and Social Impact:
 - Public education on renewable energy can raise awareness and promote sustainable living.
 - Renewable energy technologies offer a way to live collaboratively alongside nature.
- Policy and Infrastructure Considerations:

- Supportive planning policies are needed to address restrictive regulations and encourage the adoption of renewable energy.

Environmental

- Reduction of CO₂ Emissions:
 - Renewable energy technologies significantly reduce greenhouse gases, contributing to net zero goals.
 - Clean energy sources reduce reliance on fossil fuels and lower pollution levels.
- Renewable Energy Integration:
 - Solar panels on rooftops of farms and business estate buildings can decarbonise the electricity sector and reduce the environmental footprint.

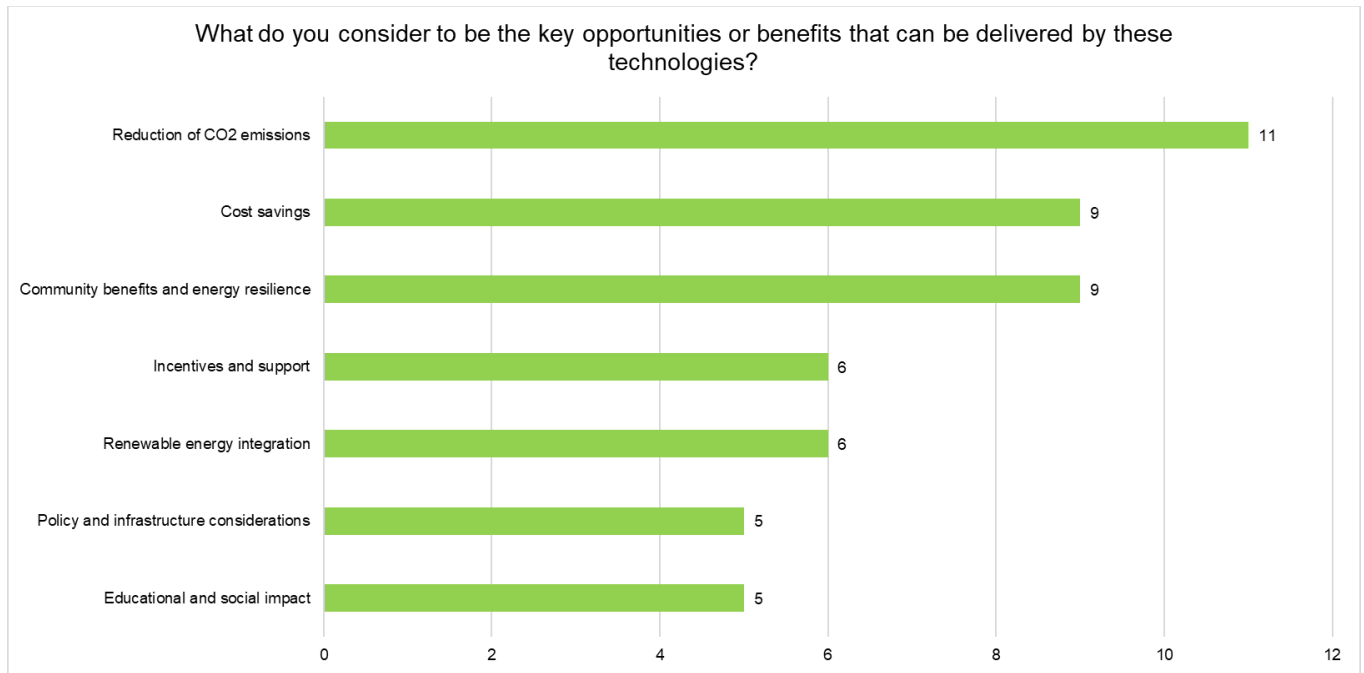
Economic

- Cost Savings:
 - Renewable energy technologies can provide long-term cost efficiencies for households and businesses.
 - Local energy production can reduce energy costs and enhance economic resilience.
- Incentives and Support:

- Incentives for local renewable energy schemes can make projects more economically viable.
- Investment in smart grids and infrastructure is necessary to support the integration of renewable energy.

3.48 The quantified responses are depicted in **Figure 3.11** below. As above, it is important to note that the total count of 39 responses cannot be reached due to overlaps in answers across categories or instances of unusable responses. The figure does however accurately represent the frequency of key points raised in the feedback received.

Figure 3.11: What do you consider to be the key opportunities or benefits that can be delivered by these technologies?



Do you have any examples of the multiple benefits associated with renewable energy technologies that could be delivered within the National Park? I.e. enhancements for nature, such as, solar farms delivering benefits to biodiversity through wildflower meadows, hedgerows etc.

3.49 There were 31 responses to this open-ended question. Key points include:

- **Biodiversity Enhancement:** Well-managed solar farms can act as nature reserves, benefiting biodiversity. Examples raised include solar farms in Leicester, Beechwood Village Hall and Arlington, which have shown significant Biodiversity Net Gain (BNG). One respondent referred to a planned 49MW solar farm on the edge of the park with a 150% net gain in biodiversity. Noted that organisations such as the National Trust, RSPB, Friends of the Earth and the Bumblebee Trust recognise the ecological value of well-managed solar projects.

- **Carbon Reduction and General Liveability:** Carbon reduction through renewable energy enhances future biodiversity and overall liveability in the landscape.
- **Tidal Barrage as Flood Prevention:** Tidal barrage / generation schemes, like those on the Adur, could provide some prevention of tidal flooding.
- **Resilience and Reliability:** Renewable energy investments provide resilience against power outages, which is particularly important for rural communities and vulnerable populations.

Community energy schemes

Are you supportive of community led renewable energy schemes (i.e. schemes that have an administrative and financial structure in place to deliver / manage / own the project and any income from it for the benefit of the community)?

3.50 There were 39 responses to this open-ended question. Responses indicated strong support for community-led

renewable energy schemes, particularly within the SDNP. Key points include:

- **General Support:** There was widespread agreement on the benefits of community-led renewable energy projects, with a significant majority of respondents expressing their support.
- **Community Investment:** Some responses emphasised the potential for community investment schemes, suggesting that residents could collectively fund and benefit from renewable energy projects leading to cost savings and energy independence for the community.
- **Tidal and Solar Projects:** Specific mention was made to tidal schemes on the River Arun and solar panels on roofs as viable options. These projects are seen as particularly suitable for the area.
- **Conditions and Considerations:** Support is generally contingent on certain conditions, such as the impact on the locality, the size of the community and the complexity of administering such schemes. Respondents raised concerns about the practicality and administration of community energy projects.
- **Potential Challenges:** A few respondents' expressed doubts regarding the feasibility of these projects due to the complexity of the energy market and the availability of local skills and resources.

If you felt you could benefit from a locally installed renewable energy project (lower energy prices/return on investment), would you be more inclined to want renewables?

3.51 There were 39 responses to this open-ended question. Responses reflected strong support towards embracing renewable energy projects, particularly those that are community-led, despite recognising certain regulatory and environmental challenges. Key points include:

- **General Support:** The majority of respondents expressed clear support for renewable energy projects, emphasising the benefits for the community and nature resilience. However, some respondents were conditional in their support, dependent on the specific location and environmental impact of the projects.
- **Community and Economic Benefits:** Many respondents recognised the additional benefits of community-owned renewable energy, including security of supply, community wealth and resilience.
- **Regulatory Challenges:** Some responses highlighted the need for regulatory reform to facilitate local community-led schemes, for example reference to the

failed Local Electricity (No2) Bill as an example of needed changes.

Have you come across Energy co-ops as a model for generating local renewable energy and providing green investment opportunities within the South Downs National Park?

3.52 There were 39 responses to this question. Responses indicated a mixture of support, lack of awareness and a need for more proposals and engagement to increase the adoption of community energy initiatives within the SDNP. Key points include:

- **General Support:** Some respondents expressed clear support for community energy initiatives, mentioning specific projects like Riding Sunbeams, OVESCO, Energise South Downs and the role of Community Energy South in helping start local energy cooperatives.
- **Lack of Proposals:** Several respondents noted that no community energy cooperatives have been proposed in their area to date, suggesting a need for more local initiatives and proposals.
- **Lack of Awareness:** A significant number of respondents were not aware of any community energy initiatives within the SDNP or have not come across such opportunities.

Are you supportive of community energy initiatives within the National Park such as, collective switching of electricity or gas supplies, collective purchasing of heating oil for gas-grid communities, working in partnership with the local Distribution Network Operator (DNO) to pilot smart technologies, community owned renewable electricity installations such as solar panels on schools or village halls or the removal of oil-dependent infrastructure?

3.53 There were 39 responses to this open-ended question. Responses showed a preference for sustainable, community-driven energy projects, with a focus on reducing carbon emissions and enhancing local energy independence. Key points include:

- **General Support:** The majority of respondents expressed strong support for community energy initiatives, including collective purchasing schemes and renewable energy installations. It was noted that some communities with village halls are already prepared to implement solar panel installations. Certain areas, like Cheriton, have long-standing collective purchasing schemes for heating oil, indicating a precedent for community-based energy solutions.

- **Carbon Fuel Reduction:** Respondents placed an emphasis on moving away from carbon fuels, suggesting that community initiatives should promote sustainable energy sources without creating dependency on fossil fuels. Similarly, while there is strong support for renewable energy projects, there was some resistance to initiatives involving gas, with a preference for more sustainable options.

Do you know of any such community initiatives (as outlined in Question 13) within the South Downs National Park?

3.54 There were 39 responses to this question. Key points include:

Existing Initiatives

- **Bury Village Hall:** Has roof solar panels.
- **Energise South Downs:** Mentioned as an existing initiative.
- **Fuel Coop:** Recognised by some respondents.
- **Harting Community Hall:** Supported by the Parish Council, includes plans for additional solar panels, an air source heat pump and battery backup for Henry Warren Hall.
- **Cheriton:** Has a heating oil purchasing scheme.
- **Village Hall (No Name):** Equipped with solar thermal water heating, a wind turbine and ground source heating, though there are maintenance challenges.

Nearby Initiatives

- Initiatives such as Communiheat in Barcombe and solar panels on schools and businesses like Priory School and Harveys Brewery in Lewes are mentioned but are located just outside the boundary of the SDNP.

Lack of Knowledge

- A significant number of respondents do not know of any community energy initiatives within the SDNP.

Please provide any other comments you would like to add in relation to renewable development within the South Downs National Park.

3.55 There were 30 responses to this question. Key points include:

Policy and Planning

- Recommendations for mandatory solar panel installations on new builds and updates to planning policy to support renewable energy and energy efficiency.

- Calls for a systems approach to energy use, including retrofitting existing buildings and using regenerative materials.

Community Projects

- Strong support for community-led renewable energy projects and the inclusion of local opinions in decision-making.

Environmental and Landscape Protection

- Concerns about maintaining the natural beauty and historical integrity of the SDNP while implementing renewable projects.
- Suggestions for rewilding parts of the SDNP and using redundant pits and woodlands for environmental benefits.

General Comments

- Hesitance about the scale and impact of renewable projects, with strong support balanced by calls for careful consideration.
- Encouragement for the SDNPA to lead in promoting renewable energy and adopting flexible planning regulations to facilitate these developments.

Interactive Map

3.56 The interactive map allowed participants to identify potential areas for development, including what type of renewable energy development they would prefer. The figure below shows the points that were plotted on the interactive map.

3.57 A question about the interactive map, which is below, was also included as part of the survey:

Using the interactive map, where do you think there may be potential for renewable energy development? Please also add in type and scale of technology.

3.58 There were 20 responses to this open-ended question. The responses highlight several key considerations and suggestions for integrating renewable energy in the SDNP. These include:

Specific Site Suggestions

- No specific areas were identified in the Parish Priority Statement, but Harting Climate Action Network identified potential sites through various workshops.
- The strip of poor-quality land opposite Firlie junction and north of the A27 was suggested for solar farms or wind turbines.

- Suitable areas for small-scale hydroelectric projects were suggested in the Angmering portion of the park, benefiting from local watercourses, and reducing flooding.

Wind Turbines

- Offshore wind was suggested as an alternative to avoid visual impact within the Park.
- Potential for wind turbines on poor-quality land and large buildings was noted.

Solar Panels

- Should be installed on all public buildings, supermarkets, warehouses, car parks, large business buildings, agricultural buildings, large industrial buildings and new housing. There was a strong emphasis on utilising roofs for solar panels, both domestic and commercial, to avoid land use conflicts.

Biomass and Anaerobic Digestion

- Biomass crops and anaerobic digestion facilities should be located in big towns and cities to mitigate environmental impact within the SDNP.

Hydroelectric Power

- Small-scale hydroelectric projects were suggested in areas with significant watercourses like Angmering.

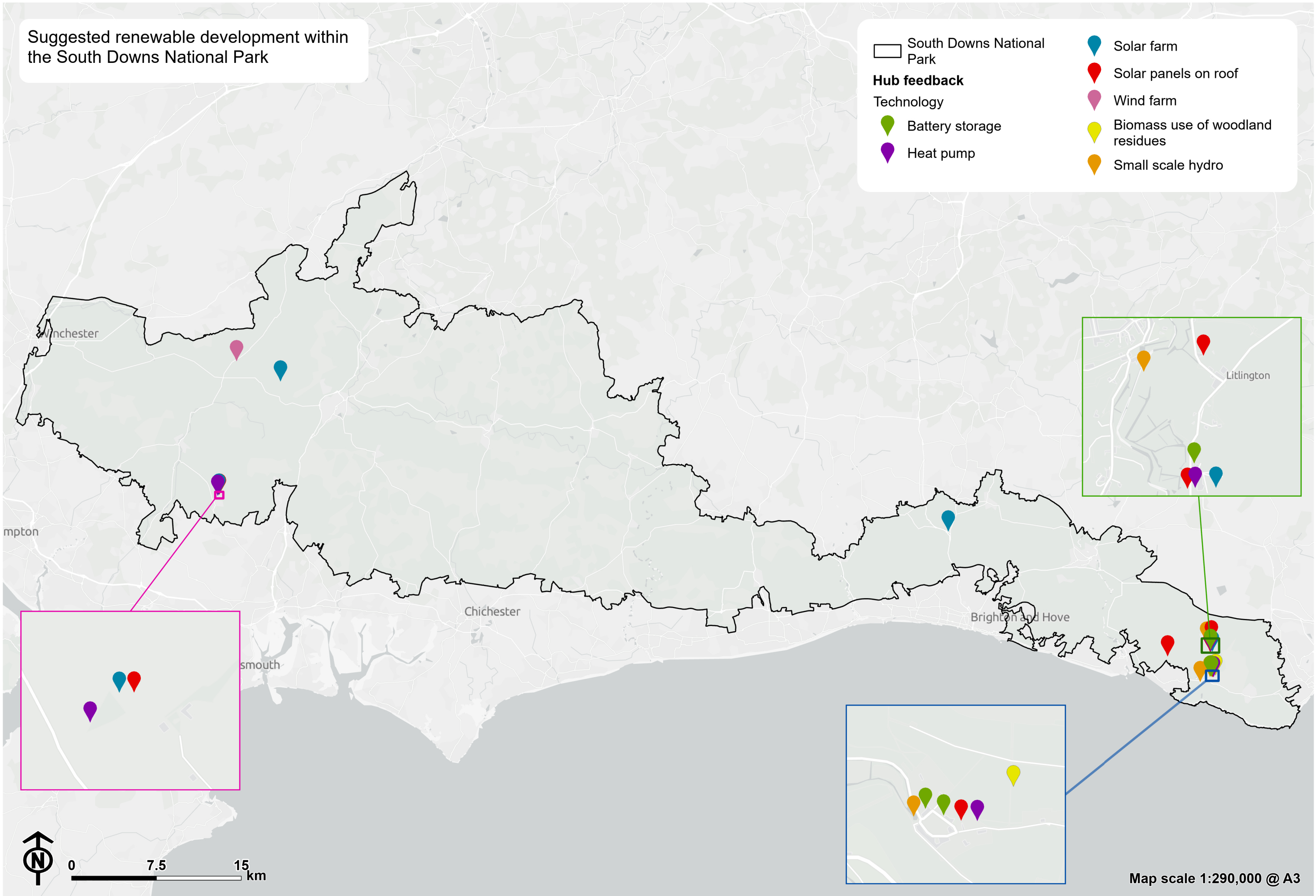
Barriers to Implementation

- Conservation areas may present challenges for installing renewable energy technologies.
- Detailed surveys and concept designs are necessary before any decisions can be made.

3.59 In addition to the above, in total, there were 20 responses that came directly from the interactive map. These are summarised below.

Suggested renewable development within the South Downs National Park

- South Downs National Park
- Hub feedback Technology**
- Battery storage
- Heat pump
- Solar farm
- Solar panels on roof
- Wind farm
- Biomass use of woodland residues
- Small scale hydro



Map scale 1:290,000 @ A3

Solar panels on roofs

3.60 Solar panels on roofs received five suggestions for appropriate siting on the interactive map. Open-ended comments made in tandem with these suggestions were included. Key points include:

- There is strong grassroots interest and initial support for renewable energy development in Hambledon. Further efforts are needed to identify viable options, with solar farms, solar panels and heat pumps appearing most feasible from a layperson's perspective.
- All houses in the community are considered appropriate for these renewable energy solutions.

Solar farms

3.61 Solar farms received four suggestions for appropriate siting on the interactive map. Open-ended comments made in tandem with these suggestions were included. Key points include:

- The field south of Pyecombe church, owned by the Plough pub, is proposed as an excellent location for a solar farm. Currently, it is unused, with no animals grazing, although solar farms can coexist with grazing.
- There is strong community interest and initial support for renewable energy development in Hambledon. Further efforts are needed to explore viable options, with solar farms, solar panels and heat pumps appearing most feasible. Additionally, there are a few other potential sites nearby for small solar installations.

Heat pumps

3.62 Heat pumps received three suggestions for appropriate siting on the interactive map. Open-ended comments made in tandem with these suggestions were included. Key points include:

- There is strong community interest and initial support for renewable energy development in Hambledon. Further efforts are needed to explore viable options, with solar farms, solar panels and heat pumps appearing most feasible. Additionally, there are a few other potential sites nearby for small solar installations.

Small scale hydro

3.63 Small hydro received three suggestions for appropriate siting on the interactive map. There were no open-ended comments made in tandem with these suggestions.

Battery storage

3.64 Battery storage received three suggestions for appropriate siting on the interactive map. There were no open-ended comments made in tandem with these suggestions.

Wind farm

3.65 A wind farm received one suggestion for appropriate siting on the interactive map. One open-ended comment was made in tandem with this suggestion. Key points include:

- There is a potential site for a small wind turbine.

Biomass use of woodland residues

3.66 Biomass use of woodland residues received one suggestion for appropriate siting on the interactive map. There were no open-ended comments made in tandem with this suggestion.

Summary

3.67 Overall, the consultation comments received were very positive about renewable energy technologies within the SDNP, especially for heat pumps, rooftop solar, biomass and battery storage. It is clear that respondents think switching to renewable energy to combat climate change is very important, but many respondents noted that technologies that do not compromise the visual and environmental qualities of the SDNP should be prioritised. However, several barriers were identified that could limit development of renewable energy technologies, such as visual and environmental impacts, lack of supportive planning policy and economic considerations.

3.68 Although not every respondent knew about community energy projects within the Park, responses reflected strong support towards embracing renewable energy projects, particularly those that are community-led, despite recognising certain regulatory and environmental challenges.

Chapter 4

Policy Options for Community and Small-Scale Energy Proposals

Introduction

4.1 This Chapter reviews current policy in relation to community and small-scale energy developments at a national and local level. This includes national planning policy and legislation and the current South Downs Local Plan (2019) and Technical Advice Note (TAN) for Small Scale Renewable Energy Projects (2022).

4.2 The chapter also explores policy approaches adopted by other Local Authorities. The Chapter goes on to provide potential policy recommendations for the National Park Authority to consider which encourage the uptake of appropriate community and small-scale energy developments.

National Planning Policy and Legislation

Climate Change and Renewable Energy Legislation and Policy

4.3 Climate Change Act 2008: The UK's legally binding emission reduction targets were first set by the Climate Change Act 2008 and included a reduction of at least 80% by 2050 against the 1990 baseline.¹ However, on 1st May 2019, Parliament declared a formal climate and environment emergency, and on 12th June 2019 the Government amended the Climate Change Act to target full net carbon neutrality (a 100% reduction of greenhouse gas emissions) in the UK by 2050.²

4.4 In response to its obligations to prepare policies to meet climate targets, the UK Government has also produced various sector-specific policies and strategies. These include the Net Zero Strategy (2021), Ten Point Plan for a Green Industrial Revolution (2020), UK National Energy & Climate Plan (2019), the Clean Growth Strategy (2017) and the Industrial Strategy White Paper (2017) (further details below). In addition, in December 2020, the Department for Business Energy and Industrial Strategy (BEIS) published the Energy White Paper which sets out how the UK will clean up its energy system and reach net zero emissions by 2050. This was followed by the Energy Security Plan in March 2023 which sets out an approach to move away from imported fossil fuels and transforming the energy system. This Plan is

¹ [IPCC \(2018\) Global Warming of 1.5°C \[online\]](#)

² [Committee on Climate Change \(2020\) The Sixth Carbon Budget: The UK's path to Net Zero \[pdf\]](#)

complemented by the Net Zero Growth Plan (2023) which focuses on the UK's long term decarbonisation strategy.

4.5 Net Zero Strategy: The Net Zero Strategy (Oct 2021) sets out the UK's policies and proposals to meet its allocated carbon budgets and Nationally Determined Contributions (NDC's) alongside the long-term vision of decarbonising the economy by 2050. The strategy sets out a delivery pathway showing indicative emissions reductions across sectors to meet the UK's targets up to the sixth carbon budget (2033-2037). This builds on the proposals set out in the Ten Point Plan for a Green Industrial Revolution. Key policies in the strategy include:

- By 2035 the UK will be powered entirely by clean electricity, subject to security of supply; and
- 40GW of offshore wind by 2030 and further development of onshore wind and solar projects. Ensuring that new renewable projects incorporate generation and demand in the most efficient way – taking into account the needs of local communities.

4.6 The strategy also outlines key commitments in Local Climate Action, including:

- Setting clearer expectations on how central and local government interact in the delivery of net zero;
- Establishing a Local Net Zero Forum, chaired by BEIS, to bring together national and local government officials to discuss policy and delivery on net zero; and
- Continuing the Local Net Zero Programme to support local areas with their capability and capacity to meet net zero.

4.7 Energy White Paper – Powering Our Net Zero Future:

This white paper (2020) is based on the Ten Point Plan and sets out the specific energy-related measures that will be implemented in line with the UK's 2050 net zero target. The paper emphasises the UK government's commitment to ensuring that the cost of the transition is fair and affordable for consumers. Key commitments in the paper include:

- Targeting 40GW of offshore wind generation by 2030, including 1GW of floating wind generation. This is alongside the expansion of other renewable technologies;
- Supporting the development of CCUS in four industrial clusters;

- Consulting on whether to stop gas grid connections to new homes being built from 2025;
- Increasing the installation of electric heat pumps from 30,000 per year to 600,000 per year by 2028; and
- Aim to develop 5GW of low-carbon hydrogen production capacity by 2030.

4.8 The Ten Point Plan for a Green Industrial Revolution:

This plan (published in 2020) puts forward the ten main areas where the UK wishes to scale up decarbonisation, mobilising £12 billion of government investment. The outlined areas in the plan will be continually built upon by further legislation and policy, such as the Net Zero Strategy (2021) and Energy White Paper (2020).

4.9 UK National Energy and Climate Plan: The Draft UK National Energy and Climate Plan (2019) sets out the UK's approach to meeting the five objectives of the EU's Energy Union:³ energy security; energy efficiency; decarbonisation; the internal energy market; and research, innovation and competitiveness.

4.10 The Plan describes the current state of the energy sector in the UK, outlining the government's current approach to climate change mitigation through policy, and how this is expected to affect the five objectives of the Energy Union in future. This is supported by a summary table containing all the relevant UK policies that contribute to achieving the UK's climate goals, taken from the UK's National Communication with the United Nations Framework Convention on Climate Change (UNFCCC).

4.11 The report also includes scenario testing on the UK's projected emissions to 2035, with business as usual, all current measures and all current and planned measure scenarios. It demonstrates that the government's current measures have the potential to reduce baseline emissions by approximately 20% over the current baseline, with a further 10% reduction through implementation of planned measures.

4.12 Clean Growth Strategy: In the context of the UK's legal requirements under the Climate Change Act, the UK's approach to reducing emissions, as set out in the Clean Growth Strategy (2017), has two guiding objectives:

1. To meet domestic commitments at the lowest possible net cost to UK taxpayers, consumers and businesses; and
2. To maximise the social and economic benefits for the UK from this transition.

³ The EU Energy Union is a project of the European Commission to coordinate the transformation of European energy supply. On 31st January 2020, the UK left the EU and is no longer part of the Energy

Union. However, there are still UK policies and measures in force relating to the five dimensions of the EU's Energy Union.

4.13 The Clean Growth Strategy sets out three possible pathways to decarbonise the UK’s economy by 2050:

1. **Electric:** Including full deployment of electric vehicles (EVs), electric space heating, and industry moves to ‘clean fuels’.
2. **Hydrogen:** Including heating homes and buildings, fuelling many vehicles and the power industry.
3. **Emissions removal:** Including construction of sustainable biomass power stations with carbon capture and storage technology.

4.14 The Strategy also encourages local authorities to actively pursue a low carbon economy:

“Local areas are best placed to drive emission reductions through their unique position of managing policy on land, buildings, water, waste and transport. They can embed low carbon measures in strategic plans across areas such as health and social care, transport, and housing.” [p118]

4.15 The strategy also announced up to £557 million in further ‘Pot 2’ (less established renewables) funding for Contracts for Difference (CfD) – a 15-year contract that offers low-carbon electricity generators payments for the electricity they produce. This opened in May 2019.

4.16 Other relevant climate change and renewable energy legislation and policy includes:

- Green Finance Taskforce and the Green Finance Strategy
- Industrial Strategy White Paper 2017
- British Energy Security Strategy
- UK Ban of New Petrol and Diesel Cars by 2030
- UK Heating System Target
- UK Power System Decarbonisation

National Planning Legislation

4.17 Planning and Compulsory Purchase Act: The Planning and Compulsory Purchase Act (2004) sets out the structure of the local planning framework for England, including the duty on plan-making authorities to mitigate and adapt to climate change. In other words, local planning authorities must make positive and proactive policies and decisions which contribute to the mitigation of, and adaptation to, climate change – polices and decisions that make measurable, ongoing reductions in carbon emissions reported in the Authority’s annual monitoring reports. This legislation is

supported by national planning policy and guidance set out below.

4.18 Section 19(1A) of the Planning and Compulsory Purchase Act 2004 requires that climate change is addressed through development plan documents and that obligations regarding annual monitoring of any targets or indicators are fulfilled:

“Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change.” [Section 19(1A)]

“Every local planning authority must prepare reports containing such information as is prescribed as to...the extent to which the policies set out in the local development documents are being achieved.” [Section 35(2)]

4.19 This means that local plans must consider how policies can deliver on these requirements, including having regard to the objectives and trajectories for reducing emissions set out within the Climate Change Act (2008).

4.20 Planning Act and National Policy Statements: The Planning Act (2008) introduced a new planning regime for nationally significant infrastructure projects (NSIPs), including energy generation plants of capacity greater than 50 megawatts (50MW). In 2011, six National Policy Statements (NPSs) for Energy were published. The energy NPSs are designed to ensure that major energy planning decisions are transparent and are considered against a clear policy framework. They set out national policy against which proposals for major energy projects will be determined by the National Infrastructure Directorate (NID) (formerly the Infrastructure Planning Commission or IPC).

4.21 The Overarching National Policy Statement for Energy (EN-1) sets out national policy for energy infrastructure and describes the need for new nationally significant energy infrastructure projects. EN-3 (NPS for Renewable Energy Infrastructure) provides the primary basis for decisions by the NID on applications it receives for nationally significant renewable energy infrastructure. It provides guidance on various technologies and their potential for significant effects. In 2016, onshore wind installations above 50MW were removed from the NSIP regime; as such, these applications are now dealt with by local planning authorities, based on the NPPF. The NPSs were consulted on in 2021 and officially updated in 2024 to:

- Reflect the current regulatory framework and contain new transitional provisions applicable during and following a review;

- Update the Government’s greenhouse gas emission reductions target from “at least 80%” by 2050 to net zero by 2050, and 78% by 2035 compared to 1990 levels;
- Add flexibility for the applicability of the NPS to new and developing types of energy infrastructure, such as carbon capture and storage and hydrogen infrastructure;
- Confirm future energy generation would come from a range of sources including renewables, nuclear, low carbon hydrogen, with “residual use of unabated natural gas and crude oil fuels” for heat, electricity, transport, and industrial applications; and
- Remove reference to the need for new coal and large-scale oil-fired electricity generation and update references to the need for other infrastructure.

4.22 Furthermore, renewable energy infrastructure is now classified as a Critical National Priority.

4.23 Since the 2021 update, the British Energy Security Strategy (2022) was published and as such set out some commitments relating to planning reform. Therefore, various changes were made to the draft energy NPS and were consulted on until the end of May 2023. The amended NPSs are likely to strengthen the process for delivering major new energy infrastructure in England and Wales, reinforcing the country’s national priority of delivering on net zero. The updates are also expected to speed up the planning process so that low-carbon generation can be developed at the right time and place whilst protecting and enhancing the national and historic environments and landscape.

4.24 Planning and Energy Act: The Planning and Energy Act (2008) enables local planning authorities to set requirements for energy use and energy efficiency in local plans, including a proportion of energy used in development to be generated from renewable and low carbon sources in the locality of the development. Such requirements can relate to specific types and scales of development but also broad areas within a local planning authority’s area of influence, such as areas with optimal conditions for decentralised heat networks.

4.25 The Act also enables local authorities to require standards for energy efficiency in new buildings beyond those in the Building Regulations. In 2015 the energy efficiency requirements were proposed to be repealed, to effectively make the Building Regulations the sole authority regarding energy efficiency standards for residential development and removing the ability for local planning authorities to set their own energy efficiency standards. However, while the power was removed in principle and consultation on new Building Regulation has been undertaken, the Government has not yet produced a commencement date for repealing these powers, which therefore remain in place. More details on Part L of the Building Regulations are set out from paragraph 2.44.

National Planning Policy

4.26 The Government published an updated and revised NPPF in December 2023, which sets out the environmental, social and economic planning policies for England. Central to the NPPF policies is a presumption in favour of sustainable development, that development should be planned for positively and individual proposals should be approved wherever possible. One of the overarching objectives that underpins the NPPF is set out in Paragraph 8: “an environmental objective – to protect and enhance our natural, built and historic environment; including...mitigating and adapting to climate change, including moving to a low carbon economy”.

4.27 The revised NPPF supports delivery of the Neighbourhood Planning Act (2017) by making explicit reference to the need for local planning authorities to work with duty to cooperate partners on strategic priorities (paragraph 24) and defined strategic policies that make sufficient provision for climate change mitigation and adaptation (paragraph 20). These amendments provide a clear policy framework for local planning authorities to work collaboratively with partners and neighbours to tackle climate change mitigation and adaptation at a strategic scale and over the longer term.

4.28 Paragraph 158 of the NPPF states:

“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.”

4.29 Paragraph 160 states that:

“To help increase the use and supply of renewable and low carbon energy and heat, plans should:

- A. Provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);
- B. Consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and
- C. Identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.”

4.30 Paragraph 161 states that local planning authorities should:

“Support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.”

4.31 The NPPF goes on to state that:

“When determining planning applications for renewable and low carbon development, local planning authorities should:

A. Not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and

B. 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 expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.”

4.32 The updated NPPF made minor alterations to the renewable and low carbon development section. Footnotes 57 and 58 only apply to onshore wind and include two tests which together created a de facto ban on onshore wind in England. However, a policy statement from the new Labour Government on onshore wind was published on 8 July 2024, which states that those two tests no longer apply. As such, this means that onshore wind applications will be treated in the same way as other energy development proposals⁴. Further changes to enable renewable energy development are likely to come forward in the forthcoming changes to the NPPF.

4.33 Additional relevant policy includes:

- National Planning Practice Guidance (PPG).
- Neighbourhood Development Plans.
- Building Regulations – Part L.

SDNPA Policy and Guidance

South Downs Local Plan (Adopted 2019)

4.34 The South Downs Local Plan was adopted in 2019 and includes Development Management Policy SD51 on Renewable Energy. This provides a starting point for the analysis of options to strengthen future policies.

4.35 Development Management Policy SD51: Renewable Energy outlines the criteria for permitting renewable energy schemes within the National Park to aid in reducing greenhouse gas emissions and achieving carbon neutrality. The policy is divided into two main criteria:

1. Development proposals for renewable energy schemes:
 - Makes provision for the removal of the facilities and restoration of the site if they cease operation.
 - Must not impede existing public access.
 - Must not result in the loss of use of Grades 1, 2 or 3a agricultural land.
2. Development proposals for small-scale individual wind turbines and freestanding solar arrays:
 - Must be suitably sited and screened, and clearly associated with the properties they are intended to serve.
 - Must be of an appropriate scale relative to the property.
 - Must not have an unacceptable adverse impact on local amenity or conflict with public safety.

4.36 A summary of the existing relevant policy and the strengths and weaknesses for it are set out below:

Strengths:

- The policy ensures that developments which are not operational are decommissioned.
- The policy explicitly permits small-scale individual wind turbines and solar arrays if they meet certain criteria.

Weaknesses:

- The terms "suitably sited and screened" and "appropriate in scale" are subjective and do not offer specific detail for potential new development.
- It is highly unlikely that wind turbines can be screened in reality.

⁴ Department for Energy Security and Net Zero (2024) Policy statement on onshore wind [online] Available here: [Policy statement on onshore wind - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policy-statements/policy-statement-on-onshore-wind)

- The requirement to demonstrate that there is no adverse impact on local amenity might be a barrier for small property owners due to the potential costs and complexity involved in proving compliance.
- There is little emphasis on community-led projects or shared benefits, potentially limiting the growth of community energy initiatives or any other form of renewable energy development unless it is linked with a property.
- The categorical statement that there should be no loss of best and most versatile land is overly restrictive. Caveats could be included to state that there should be no significant loss 'unless exceptionally justified' or significant sustainability benefits are demonstrated to outweigh any loss'.

SDNPA Small Scale Renewable Energy Technical Advice Note (TAN) (2022)

4.37 The purpose of the TAN is to provide guidance to applicants on how to make a successful planning application for small scale renewable energy schemes. It covers various renewable technologies including rooftop solar panels, ground mounted solar, wind turbines, heat pumps, hydropower and biomass. The TAN outlines planning considerations, such as visual impact, location suitability and environmental effects. It also provides a table that sets out renewable technology by landscape character type with ratings spanning from suitable to unsuitable. It aims to support sustainable energy initiatives while ensuring they align with local planning policies and preserve the landscape and heritage of the South Downs National Park.

4.38 The TAN provides a level of guidance that cannot be provided within the Local Plan. However, the TAN could go further and include additional guidance on scale of development that would be acceptable and community-led renewable energy schemes. This could include defining what is meant by projects that are 'led by' or 'meet the needs' of local communities.

Local Plan Policy Examples

4.39 To provide further context, LUC undertook an assessment of other local plans in England that include supportive policies for small scale renewable energy schemes and community energy. These policies could be used as a foundation for drafting initial policy wording for the emerging South Downs Local Plan:

- **Bath and North East Somerset Local Plan (Adopted 2023)⁵:** Policy SCR4: Community Renewable Energy Schemes emphasises the positive benefits of community energy schemes, preferring projects led by and meeting the needs of local communities with local ownership and governance.
- **Cornwall Climate Emergency Development Plan Document (Adopted 2023)⁶:** Policy RE1 – Renewable and Low Carbon Energy states that significant weight will be given to community led energy schemes where evidence of community support can be demonstrated, with administrative and financial structures in place to deliver/ manage the project and any income from it. Encouragement will be given to schemes to provide for a community benefit in terms of profit sharing or proportion of community ownership and delivery of local social and community benefits. This policy also sets out clear criteria for specific generation types.
- **Central Lincolnshire Local Plan (Adopted 2023)⁷:** Policy S14: Renewable Energy aims to support the transition to a net-zero carbon future by maximising appropriately located renewable energy projects, focusing on wind and solar energy. Provision is made for small-scale renewable energy schemes and community-led projects which receive additional weight, provided they meet the outlined criteria and do not cause significant harm.
- **North Tyneside Local Plan (Adopted 2017)⁸:** Policy DM7.6: Renewable Energy and Low-Carbon Technologies supports small-scale renewable energy and community energy schemes by encouraging local production of energy from renewable and low-carbon sources. It promotes community energy schemes that reduce, manage and generate energy that provide local benefits. The policy ensures that renewable energy and micro-generation technologies are supported as long as they do not result in adverse effects.
- **Runnymede Local Plan (Adopted 2020)⁹:** This includes Policy SD8: Renewable & Low Carbon Energy which supports small-scale renewable energy schemes and community energy by encouraging proposals for stand-alone and community-led renewable, low-carbon and decentralised energy sources, provided any adverse impacts are mitigated.
- **East Devon Local Plan 2013-2031 (Adopted 2016)¹⁰:** Strategy 41 of this Plan sets out that in some instances

⁵ [Bath and North East Somerset Council \(2023\) Local Plan Partial Update](#)

⁶ [Cornwall Council \(2023\) Climate Emergency Development Plan](#)

⁷ [Central Lincolnshire Council \(2023\) Central Lincolnshire Local Plan](#)

⁸ [North Tyneside Council \(2017\) North Tyneside Local Plan](#)

⁹ [Runnymede Borough Council \(2020\) Runnymede 2030 Local Plan](#)

¹⁰ [East Devon District Council \(2016\) East Devon Local Plan 2013-2031](#)

on site renewable energy may not be appropriate, therefore in these cases, developments can meet requirements through contributing to 'off site' provision in the form of helping to fund a 'Community Energy Fund'. This Fund will be used to pay for energy conservation/renewable initiatives.

4.40 The full policy text of Policy SCR4: Community Renewable Energy Schemes of the Bath and North East Somerset Local Plan and Policy RE1: Renewable and Low Carbon Energy of the Cornwall Climate Emergency Development Plan are included in **Appendix A** for reference.

Policy Options

4.41 An effective local development plan is key to the delivery of appropriate renewable energy development within the SDNP. Based on a review of national and local guidance, this section provides recommendations on how the National Park Authority may wish to implement clearer and more supportive guidance into their local development plan for the uptake of small-scale renewable energy and community-led renewable energy schemes.

Small scale renewable energy

Criteria Based Policies

4.42 Greater provision can be made for small scale renewable energy through criteria-based policies. The NPPF states that local authorities should design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily. The PPG provides helpful guidance for local authorities on how to develop robust criteria-based policies in relation to renewable and low carbon energy projects, including small-scale infrastructure. Key points include:

- The criteria should be expressed positively (i.e. that proposals will be accepted where the impact is or can be made acceptable);
- Should consider the criteria in the National Policy Statements as these set out the impacts particular technologies can give rise to and how these should be addressed;
- Cumulative impacts require particular attention, especially the increasing impact that wind turbines and large-scale solar farms can have on landscape and local amenity as the number of turbines and solar arrays in an area increases;

- Local topography is an important factor in assessing whether wind turbines and large-scale solar farms could have a damaging effect on landscape. Recognise that the impact can be as great in predominantly flat landscapes as in hilly areas;
- Care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting; and
- Protecting local and residential amenity is an important consideration which should be given proper weight in planning decisions.

4.43 Drawing on the guidance outlined in the PPG, after expressing positive support in principle for renewable and low carbon energy development, Local Plans should list the issues that will be taken into account in considering specific applications. This should not be a long negative list of constraints, but it should set out the range of safeguards that seek to protect the environment. A requirement for the National Park will be that the scale and impact of any developments are compatible with the purpose and special qualities of the National Park designation and are appropriately avoided or mitigated.

4.44 Other key considerations may include residential amenity, aviation, heritage, ecology, tranquillity, etc. For example, the Lancaster Regulation 19 Partial Review Local Plan Part 2¹¹ Policy DM53: Renewable and Low Carbon Energy Generation is a criteria-based policy that goes further than most policies as it sets out criteria for onshore wind, hydro, solar, other renewable and low carbon technologies, heating and cooling networks and energy storage. Cornwall Climate Emergency DPD Policy RE1: Renewable and Low Carbon Energy builds on this by including criteria for various renewable energy types and states that significant weight will be given to community led energy schemes.

4.45 It is important that policy does not preclude the development of specific technologies other than in the most exceptional circumstances and does not merely repeat national policy but is relevant to the process of decision-making at the local level, focusing on locally distinctive criteria related to local assets, characteristics and sensitivities. It may also be appropriate for more detailed issues and guidance to be incorporated into an updated TAN.

4.46 For example, the Inspector's report which accompanied the Blackburn with Darwen Borough Council¹² Site Allocations and Development Management Policies Plan (adopted in 2015) noted that in order for the Plan to be found sound, the

¹¹ [Lancaster City Council \(2022\) Local Plan Part 2: Climate Emergency Review](#)

¹² [Blackburn with Darwen Borough Council \(2015\) Local Plan Part 1: Site Allocations and Development Management Policies \[online\]](#)

Borough's criteria-based policies would need to be supported by a Supplementary Planning Document (SPD) which identified suitable areas. It is therefore recommended that any criteria-based policy designed to manage the development of renewable and low carbon technologies should also be supported by guidance on the most suitable locations within the National Park for development. The Authority may wish to do this via the allocation of specific sites (see Allocation policy below) or a more comprehensive assessment of areas of potential suitability for development (i.e. beyond just those identified in the 'Call for Sites').

4.47 The strengths and weaknesses of adopting criteria-based policies are summarised below:

Strengths:

- Creates greater policy certainty for developers.
- Allows the National Park Authority to clearly set out the circumstances in which renewable energy proposals will and will not be permitted.

Weaknesses:

- May be perceived to be overly restrictive by certain stakeholders.

Allocating Sites for Standalone Renewable Energy Schemes

4.48 The Local Plan could also encourage the uptake of small-scale renewable energy projects through specifically allocating sites for standalone renewable developments. Policy could provide strategic direction to the siting of renewables for developers, investors, the local authority, statutory stakeholders and communities. It may be possible to allocate small-scale sites which have the greatest potential for sustainable energy and carbon reduction or sites that could potentially be developed for other purposes (e.g. resulting in the sterilisation of potential sites). The National Park Authority could use the site assessments LUC has prepared in the accompanying excel spreadsheet as an evidence base to bring this policy option forward.

4.49 It would be important that site allocations only highlight appropriate schemes/areas; site developers and communities would still be required to undertake detailed site-based assessment work to support individual development planning applications and if required Environmental Impact Assessments. Furthermore, site allocations should be framed such that they do not preclude projects in other locations.

4.50 Building on the criteria-based policy option above, this policy could also provide criteria specific to the site. Although it is mandatory, the criteria could make specific reference to ensuring 10% biodiversity net gain or higher is achieved on site through the renewable energy development.

4.51 The strengths and weaknesses of allocating sites for standalone renewable and low carbon energy schemes are summarised below:

Strengths:

- Provide strategic direction to the siting of renewables.
- Ensure sites with the greatest potential are identified – albeit there may be other sites beyond the call for sites which are also suitable for development.
- May promote sites to a wider audience such as co-operatives.

Weaknesses:

- Resource intensive to gather necessary evidence to justify allocation.
- Would be desirable to secure agreement of landowner which may be resource intensive (if not submitted as part of the call for sites).
- May identify potential sites for renewable energy development that are unpopular.

Community energy

4.52 There is no definition of community energy within planning law, and planning authorities are unable to assess renewable energy proposals from community energy groups any differently to commercial projects, nor give weight to the substantial co-benefits delivered by these projects¹³. However, the NPPF states that local authorities should support community-led initiatives for renewable and low carbon energy, including developments being taken forward through neighbourhood planning. Community-led renewable energy projects are increasingly being seen as an attractive option for local communities wishing to contribute to local/national climate change targets and as a way to generate local revenue to directly benefit the community. For example, the Westmill Wind Farm Co-operative¹⁴ in Swindon was the first 100% community owned wind farm to be built in the south of England.

4.53 Community groups can face considerable challenges in the pre-planning stage and there are a number of opportunities for local authorities to provide advice and

¹³ [CSE \(2024\) Barriers to Community Energy](#)

¹⁴ [Westmill Wind Farm Co-operative Limited website.](#)

guidance at this stage, including the provision of early advice on planning requirements and lending support to consultation activities within the community. Engaging communities in the earliest stages of plan-making and providing clear information on local issues and the decision making process can aid the development of community renewable energy projects.

4.54 The National Park Authority’s Local Plan Review could broaden its support for community renewable schemes by stating that the Authority would actively support community renewable energy schemes which are led by or meet the needs of local communities. Such developments would normally be conceived and/or promoted by the community within which the renewable development will be undertaken, delivering economic, social and/or environmental benefits to the community. Neighbourhood plans provide a particular opportunity to define detailed local site allocation policies for renewable and low carbon technologies. To aid neighbourhood planning committees, the National Park Authority could develop an interactive map to support the development of renewable and community energy schemes through neighbourhood plan policies (for example using outputs from a renewable energy capacity study).

4.55 The strengths and weaknesses of encouraging community renewable schemes are summarised below:

Strengths:

- Provides support to local communities to develop renewables and low carbon energy.
- Generates local revenue to directly benefit the local community.
- Can secure a broad base of local support for renewable energy schemes.

Weaknesses:

- Care may need to be taken not to prescribe the process of community ownership (i.e. shared ownership etc.) as it is not the role of the planning system to do this.

Summary of specific policy recommendations

4.56 The specific policy recommendations for SDNPA arising from this study are summarised below.

Community renewable schemes

4.57 Currently, there is no policy within the South Downs Local Plan that relates to community energy schemes. As such, a policy should be incorporated within the Local Plan Review specifically relating to community-led renewable

schemes. It should explicitly state that the National Park Authority would actively support community energy schemes which are led by or meet the needs of local communities.

4.58 Specific wording proposed:

Support will be given to renewable and low carbon energy generation developments that are led by, or meet the needs of local communities.

The positive benefits of community energy schemes will be a material consideration in assessing renewable energy development proposals. The preference is for schemes that are led by and directly meet the needs of local communities, in line with the hierarchy and project attributes below:

Community Led Energy:

- *Project part or fully owned by a local community group or social enterprise;*
- *Local community members have a governance stake in the project or organisation e.g. with voting rights.*

Justification

4.59 As stated above, community groups can face considerable challenges in the pre-planning stage and there are a number of opportunities for local authorities to provide advice and guidance at this stage. The policy wording above is based on Policy SCR4 which was successfully adopted in the Bath and North Somerset Local Plan.

Chapter 5

Summary and Next Steps

Summary

5.1 This study has brought together three discrete elements of work: high-level assessments of submitted sites for renewable energy (considering landscape, ecology, heritage and other planning issues); an overview of findings from engagement with local stakeholders on the key issues for renewable energy within the National Park; and policy recommendations for consideration in the review of the emerging Local Plan.

Next Steps

5.2 Achieving net zero is hugely challenging, considering the radical changes that are needed to enact the necessary innovative transformative action across all sectors. However, in their 'Net Zero' report, the Committee on Climate Change view the UK-wide target as being "achievable with known technologies, alongside improvements in people's lives... ..However, this is only possible if clear, stable and well-designed policies to reduce emissions further are introduced across the economy without delay".

5.3 As such, this study focussed on the potential interventions through local planning for renewable energy development. Following on from the site assessments it is recommended that the steps set out below are considered further:

- Whether the Authority wish to allocate sites and if so:
 - Work with the landowners of the best scoring sites to establish their ongoing appetite for taking the sites forward.
 - Undertake further assessments to determine the sites' suitability, particularly in relation to landscape and visual amenity, ecology and heritage issues and to provide more guidance on the nature and scale of development that may be acceptable to the SDNPA on the sites. This can then be set out in appropriate site allocation policy wording within the Local Plan.
 - Establish if the sites are viable and deliverable – particularly in relation to grid connection issues.
- Work with organisations like the Centre for Sustainable Energy and Energise South Downs in providing

additional guidance on community-led energy schemes and potential funding mechanisms.

5.4 With the South Downs National Park in the process of preparing its next Local Plan there is a clear window of opportunity to ensure that the new Local Plan sets out a step change in the support given to the development of renewable and local carbon energy projects, especially those that are community-led and meet the needs of the local community.

5.5 The delivery of renewable and low carbon projects will also require changes not just to planning policy but also to the implementation of policy. It will be imperative that appropriate consideration is given to the importance of addressing climate change in development management decisions. This should include providing appropriate training and checklists for development management officers and planning committees to ensure that the policies are implemented as intended and that due weight is given to Climate Change issues in all planning decisions.

Appendix A

Examples of Renewable Energy Policy Text

A.1 Examples of renewable energy policy text are set out below. The first is Policy SCR4: Community Renewable Energy Schemes from the Bath and North East Somerset Local Plan (2023) which is specific to community energy schemes and the second is Policy RE1: Renewable and Low Carbon Energy from the Cornwall Climate Emergency DPD (2023) which is a criteria based policy that incorporates specific text on community energy schemes.

Policy SCR4: Community Renewable Energy Schemes

1. *'The positive benefits of community energy schemes will be a material consideration in assessing renewable energy development proposals.*
2. *The preference is for schemes that are led by and directly meet the needs of local communities, in line with the hierarchy and project attributes below:*

Community Led Energy:

- a. *Project part or fully owned by a local community group or social enterprise*
- b. *Local community members have a governance stake in the project or organisation e.g. with voting rights*
3. *In the case of renewable energy proposals within the Green Belt, where community benefits are proposed to meet the "very special circumstances" test, the following criteria will be considered:*
 - a. *The contribution to achieving the targets set out in Policy CP3 of the Core Strategy to increase the level of renewable electricity and heat generation in the district;*
 - b. *The contribution that will be made to local and national renewable energy and carbon reduction targets;*
 - c. *Social and economic benefits. For example, local job creation opportunities; raising the quality of life in rural areas through diversification of agricultural land and generating an alternative income for farmers;*
 - d. *The temporary nature of the renewable energy development and the ability to restore land to its original condition at the end of the project's life;*

- e. Contributions to improving the biodiversity, public amenity and soils in the vicinity of the scheme.*
- 4. In all cases schemes will only be permitted if there is no unacceptable impact on the significance of a designated and non-designated heritage asset.*

Policy RE1: Renewable and Low Carbon Energy

- 1. Proposals for renewable and low carbon energy-generating and distribution networks, will be supported in the context of sustainable development and climate change, where:*
 - a. they contribute to meeting Cornwall's target of 100% renewable electricity supply by 2030; and*
 - b. they balance the wider environmental, social and economic benefits of renewable electricity, heat and/or fuel production and distribution; and*
 - c. It will not result in significant adverse impacts on the local environment that cannot be satisfactorily mitigated, including cumulative landscape and visual impacts, the special qualities of all nationally important landscapes, and the significance of heritage assets including their settings, including the outstanding universal value of Cornwall and West Devon Mining Landscape World Heritage Site and the character of wider historic townscapes, landscapes and seascapes; and*
 - d. In and within the setting of Areas of Outstanding Natural Beauty and undeveloped coast, developments will only be permitted in exceptional circumstances and should generally be very small scale giving due regard to the natural beauty of these areas; and*
 - e. Where the current use of the land is agricultural, the use allows for the continuation of the site for some form of agricultural activity proportionate to the scale of the proposal and provides for 10% biodiversity net gain; and*
 - f. Commercial led energy schemes with a capacity over 5MW shall provide an option to communities to own at least 5% of the scheme subject to viability; and*
 - g. There are appropriate plans and a mechanism in place for the removal of the technology on cessation of generation, and restoration of the site to its original use or an acceptable alternative use; and*
 - h. Opportunities for co-location of energy producers with energy users, in particular heat will be supported.*

Significant weight will be given to community led energy schemes where evidence of community support can be demonstrated, with administrative and financial structures in place to deliver/manage the project and any income from it.

Encouragement will be given to schemes to provide for a community benefit in terms of profit sharing or proportion of community ownership and delivery of local social and community benefits.

In addition, the following criteria will be used to assess each of the specific generation types:

- 2. Wind energy development proposals will be permitted where they:*
 - a. Are located in a 'broad suitable area' identified on the Policies Map or in an area identified in a made Neighbourhood Plan or Neighbourhood Development Order or are for the repowering of an existing wind turbine/farm; and*
 - b. Demonstrate that the planning impacts identified by the affected local community have been made acceptable by the proposal; and*
 - c. Avoid or adequately mitigate shadow, flicker, noise and adverse impact on air traffic operations, radar and air navigational installations; and*
 - d. Do not have an overshadowing or overbearing effect on nearby habitations.*
 - e. Demonstrate that proposals would be outside of the 1km buffer zone for Special Areas of Conservation and Special Protection Area sites shown on the policies map and can be delivered without resulting in adverse effects on the integrity of European Sites and ensure that potential implications of wind farm development on the migratory flightpaths and core foraging zones and other functionally linked land for SPA birds of the Marazion Marsh SPA, Tamar Estuaries Complex SPA and the Falmouth Bay to St Austell Bay SPA are fully considered.*
- 3. Solar energy development proposals for building mounted installations will be supported and encouraged wherever possible. Standalone ground mounted installations and extensions or repowering of solar installations will be supported where they are focussed on previously developed land and away from best and most versatile agricultural land unless exceptionally justified.*
- 4. Hydroelectricity development proposals will be supported as part of the transition to a low carbon economy where they can demonstrate that they would not have significant adverse impacts on the water regime, landscape and nature conservation. Schemes should prioritise rivers that are not designated for migratory fish species.*
 - a. Hydroelectricity schemes in estuaries (e.g. tidal barrages or tidal stream technologies) will need to demonstrate that they do not unacceptably impact the hydrodynamic regime in intertidal habitats. Any identified impacts will need to be*

addressed in consultation with the Environment Agency and Marine Management Organisation.

b. *Applications should provide an assessment of the potential impacts of in-river hydroelectricity schemes in their Habitat Regulations Assessment. Any potential impacts on the migratory behaviour of Anadromous fish or the continuity of riverine habitats (including, but not exclusively within the River Camel SAC and the Plymouth Sound and Estuaries SAC) will require HRA and should propose appropriate mitigation measures to avoid adverse effects on the integrity of European sites.*

5. *Deep geothermal and mine water energy development proposals will be supported as part of the transition to a low carbon economy where:*

a. *The outstanding universal value of the Cornwall and West Devon Mining Landscape World Heritage Site, the significance of heritage assets and their settings, and the character of historic townscapes, landscapes and seascapes are conserved and, where appropriate, enhanced;*

b. *There would not be a significant adverse impact on the water regime and water quality impacts are assessed and adequately mitigated; and*

c. *The visual impact of associated buildings and equipment is minimised.*

6. *Energy storage: There is a presumption in favour of energy storage where it meets one or more of the following:*

a. *It is co-located with an existing or proposed renewable energy development;*

b. *It can be shown that it alleviates grid constraints or contributes to meeting Cornwall's renewable energy supply target;*

c. *It allows further renewable developments to be deployed.*

7. *Infrastructure to support offshore renewable energy: Associated land-based infrastructure to support offshore renewable energy schemes will be supported where they meet the requirements of 1 b), c), d), f) and g) of this policy and other policies of the Local Plan.*

Proposals for non-renewable energy generation will only be supported as an exception for the purposes of temporarily supporting energy needs for a specified and limited temporary period of time and demonstration that their operation will be as low carbon as possible and comply with criteria 1 b) – g) inclusive.