

Informal Guidance Note: Renewable energy in the Green Belt in Bath & North East Somerset

Scope and status of this document

Drawing on national and local planning policy, this document provides informal guidance on how renewable energy planning proposals should respond specifically to the Green Belt designation. Other policy considerations will apply, however, this responds to the specific issue of Green Belt policy.

This informal guidance is intended for non-domestic proposals. Bath & North East Somerset Council already has guidance for domestic renewable energy within the Sustainable Construction and Retrofitting Supplementary Planning Document, and has prepared a Permitted Development Checklist for domestic renewables and energy efficiency measures.¹

This note has been prepared by the Council in collaboration with Regen SW.

Bath & North East Somerset's climate change priority

Tackling climate change is a key priority for Bath & North East Somerset Council. The Bath & North East Somerset Sustainable Community Strategy² makes the following commitment:

'We will provide the leadership to help our communities to help people reduce carbon emissions across the area by 45% by 2026.'

This commitment has been carried through into the highest level of local planning policy, the draft Core Strategy, now adopted for Development Management purposes.³ This contains an ambitious local renewable energy target, which is outlined overleaf.

¹ Sustainable Construction & Retrofitting SPD: www.bathnes.gov.uk/greenbuild

² Sustainable Community Strategy: <http://www.bathnes.gov.uk/services/your-council-and-democracy/policies-and-plans/sustainable-community-strategy>

³ Draft Core Strategy: www.bathnes.gov.uk/corestrategy

Renewable energy potential

Bath & North East Somerset Council commissioned a study⁴ that investigated the total potential for installed renewable energy capacity (electricity and heat) within the district. This study provided the evidence base for Policy CP3 of the draft Core Strategy, which sets an ambitious local target to increase the level of renewable energy generation in the district to 275 MW by 2026.

Policy CP3: Renewable Energy

Development should contribute to achieving the following minimum level of Renewable Electricity and Heat generation by 2026:

Electricity	110 MWe (Megawatt Electricity)
Heat	165 MWth (Megawatt Thermal)

Proposals for low carbon and renewable energy infrastructure, including large-scale freestanding installations, will be assessed under the national policies and against the following:

- a. potential social and economic benefits including local job creation opportunities
- b. contribution to significant community benefits
- c. the need for secure and reliable energy generation capacity
- d. environmental impact (see Policy CP6).

In order to meet the district-wide target and take advantage of the environmental and economic benefits of renewable energy, some renewable energy development in the Green Belt will be necessary.

For an up-to-date review of Bath & North East Somerset Council's progress towards these targets, please see the annual Regen SW Renewable Energy Progress Report.⁵

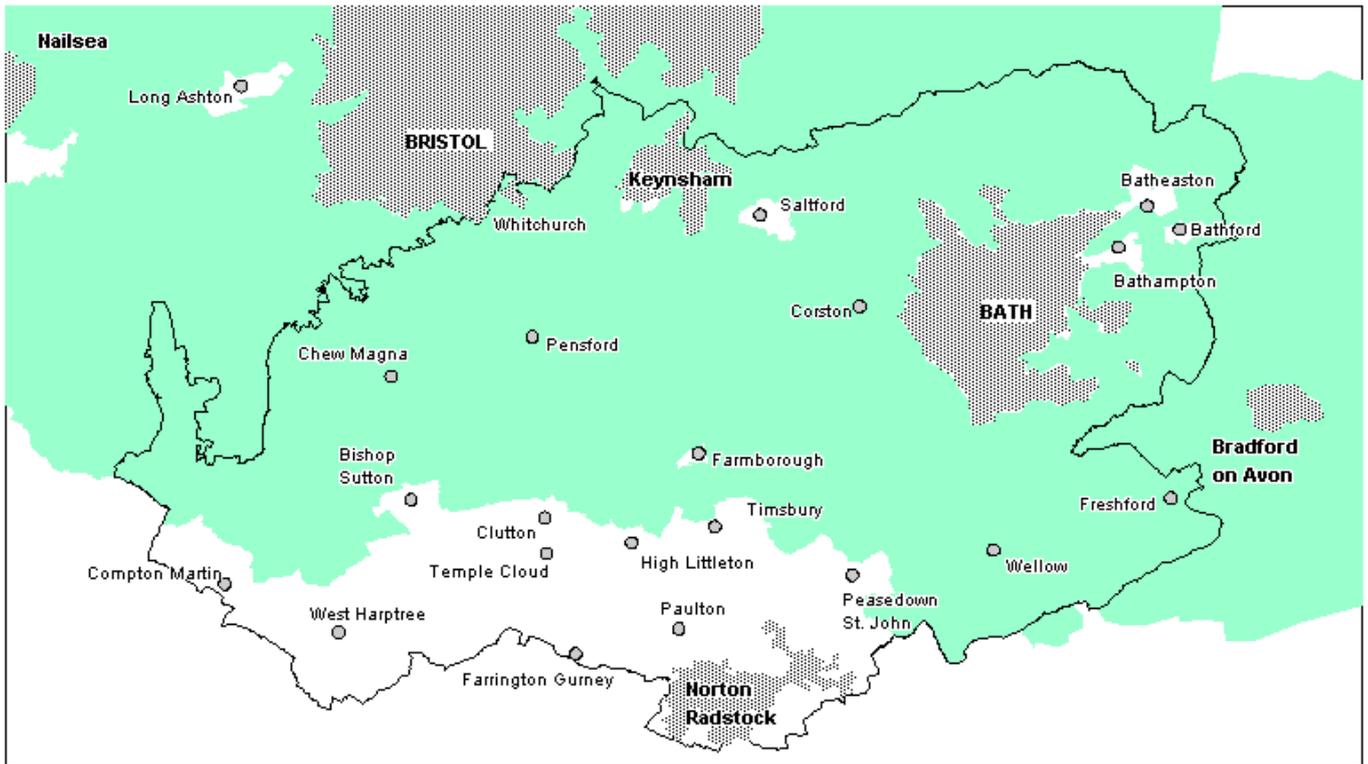
The Green Belt in Bath & North East Somerset

Approximately 70 per cent of Bath & North East Somerset is designated as Green Belt land (see the map overleaf). There is a national policy presumption against inappropriate development in the Green Belt, which is harmful by definition.

One of the purposes of the Green Belt is to check the unrestricted sprawl of large built up areas. The openness of the Green Belt is one of the key features and openness is defined largely by freedom from development. Harm to the openness of the Green Belt should be avoided if possible.

⁴ Camco "Renewable Energy Research & Planning Update" (2010): http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Evidence-Base/Sustainability/renewable_energy_research_and_planning_-_june_2009_0.pdf

⁵ Regen SW annual survey and progress reports: <http://www.regensw.co.uk/projects/support-for-decision-makers/annual-survey>



Renewable energy in the Green Belt

Chapter 9 of the National Planning Policy Framework (NPPF)⁶ is titled “Protecting Green Belt Land”. This chapter sets out the criteria that development in the Green Belt must meet. Paragraph 91 states that:

‘When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.’

Not all renewable energy projects will be categorised as ‘inappropriate development’. However, many free-standing renewable energy projects will comprise inappropriate development in the Green Belt and will need to demonstrate ‘very special circumstances’ to clearly outweigh the harm. The onus is on the applicant to demonstrate the following:

1. **That the specific benefits of the renewable energy project proposed clearly outweigh the harm it would cause to the Green Belt**, which may include:
 - Contribution to achieving the targets set out in Policy CP3 of the draft Core Strategy to increase the level of renewable electricity and heat generation in the district
 - Contribution that will be made to local and national renewable energy and carbon reduction targets
 - 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

⁶ National Planning Policy Framework (2012):

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

- Community benefits that the project might bring, for example:
 - Community ownership or part-ownership and the income from energy generated
 - The reinvestment of revenues into community funds, projects or further low carbon activities
 - A reduction in fuel poverty, either as a result of activities to invest in energy efficiency of local homes or through reduced energy tariffs for local residents
 - Education for local people about energy issues
 - Helping to deliver the aims of the local neighbourhood, town or parish plan
 - Helping to maintain or increase the viability of community buildings
 - 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.
2. **That alternative options have been investigated and rejected for valid reasons**, including alternative sites outside the Green Belt. If there are no alternative sites, what are the options on the land available (e.g. siting and design)? What makes the chosen site most appropriate?
3. **That the impact on the openness of the Green Belt has been considered and mitigated at the design stage.** The NPPF states that local planning authorities should approve the application if its impacts are (or can be made) acceptable.

The purpose of the Green Belt as outlined in national planning policy is to:

- check the unrestricted sprawl of large built-up areas
- prevent neighbouring towns merging into one another
- assist in safeguarding the countryside from encroachment
- preserve the setting and special character of historic towns
- assist in urban regeneration, by encouraging the recycling of derelict and other urban land.⁷

In addition to considering impacts on the openness of the Green Belt, applicants may also wish to consider the landscape impacts of their proposal and how this might affect the character of the area. Of relevance is Bath & North East Somerset Council's study 'Landscape Sensitivity Analysis for Wind Energy Development'.⁸

For example, it may be possible to reduce the impact of proposed development on the rural character of the countryside by using construction materials that match those used locally or by using landscaping techniques that take their lead from the existing and indigenous landscape and ecology. For example, by creating soil mounds or hedges, using wood and stone as construction materials and by enhancing biodiversity.

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⁷ National Planning Policy Framework (2012):

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

⁸ Landscape Sensitivity Analysis for Wind Energy Development, December 2010:

http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Evidence-Base/Sustainability/landscape_sensitivity_analysis_for_wind_energy.pdf