

Planning policy issues regarding proposals for low carbon and renewable energy generation.

### ***Policy framework***

1. Hart District Council adopted the Hart Local Plan (Strategy & Sites) 2032 in April 2020. Policy NBE10 deals with Renewable and Low Carbon Energy. The policy and supporting text are set in full at Annex 1 to this document.
2. The National Planning Policy Framework was updated in July 2021 (NPPF). This sets out the government's planning policies for England and how these are expected to be applied. Section 14 of the NPPF deals with Meeting the challenge of climate change, flooding and coastal change. The relevant sections are attached at Annex 2.

### ***Declarations of Climate Emergency***

3. In April 2021 Hart District Council declared a Climate Emergency. The Council has pledged to:
  - Make Hart District carbon neutral by 2040 whilst bringing forward the current 2040 target to 2035 for areas under direct control of Hart District Council;
  - Report to full Council every six months setting out the current actions the Council is taking to address this emergency and the plan to measure annual District-wide progress towards meeting the 2040 target;
  - Meaningfully engage with the local community and to work with partners across the District and County to deliver these new goals through all relevant strategies and plans drawing on local, national, and global best practice;
  - Actively work with Hampshire County Council and the Government to provide the additional powers and resources needed to meet the 2040 target; and
  - Actively encourage and push for Hampshire County Council to reduce its target for net zero carbon to 2040, acknowledging that 2050 is too far away for such an emergency.
4. In June 2019, Hampshire County Council declared a Climate Emergency. The County Council set two targets which applied to the County Council and to Hampshire as a whole. These are:
  - To be carbon neutral by 2050; and
  - Preparing to be resilient to the impacts of temperature rise (2°C).
5. In October 2021 the UK hosted the UN Climate Change Conference (COP26) in Glasgow.

## Analysis

6. The Hart Local Plan Policy NBE10 deals with Renewable and Low Carbon Energy. It covers the main issues that are likely to be relevant when balancing the merits of any proposals against any adverse impacts.
7. This policy requires that any adverse impacts are satisfactorily addressed, including individual and cumulative landscape and visual impacts. The policy also contains several other environmental criteria.
8. Impacts have to be assessed on a site-by-site basis – e.g. some sites are more visible than others from public vantage points. Applicants need to submit a Landscape and Visual Impact Assessment (LVIA). This is a specialist area and there are guidelines published by the landscape Institute on how to prepare these assessments. [Guidelines for Landscape and Visual Impact Assessment \(GLVIA3\) | Landscape Institute](#)
9. It does not cover wind turbines because national policy prevented the local plan from doing so.
10. Policy NBE10 was informed by the [North Hampshire Renewable Energy and Low Carbon Development Study](#) published in 2010. Whilst some of that study will have dated since it was produced, it includes an Energy Opportunities Plan (EOP) which identifies significant opportunities from wind and biomass in this area. This is down to characteristics of the area and is unlikely to have changed since the study was published. Solar power does not feature in the EOP because sunlight falls uniformly across the district.
11. That said, when it comes to site selection for solar farms, it is assumed that issues such as topography and the ability to connect into the grid will be key factors.
12. When a solar farm application is submitted, the Council (as the Local Planning Authority) must determine that application in light of the current development plan policies and other material considerations, including national planning policy and the Council's declaration of a climate emergency.
13. Any new local plan policies will need to be consistent with the latest version of the NPPF. However, development plan policies cannot be made 'on the hoof', they must go through due process, supported by evidence, undergo consultation and pass examination. Whilst this takes time, it does mean that once a plan is adopted, decisions on planning applications must be made in accordance with it, unless material considerations indicate otherwise.
14. In November 2021 Hart's Cabinet agreed to review the local plan (i.e., assess whether it needs updating) in 2022 after the forthcoming Planning Bill and associated policy updates and guidance are released. This is 3 years earlier than the date by which Hart is legally required to review its plan (5 years of adoption - April 2025). Climate change policies will clearly feature in that

review. Following that review a decision will be made as to whether to update the local plan in whole or in part.

15. In terms of the national approach, it is likely that the NPPF and the role of the planning system will continue to evolve on the issue of climate change.
16. In any future Plan policy, it is important to remember Hart district is not an island. The principle relating to Climate Change has been 'Think Global, Act Local' for several years.

## Annex 1: Hart Local Plan (Strategy & Sites) 2032

### Renewable and Low Carbon Energy

307. The delivery of renewable and low carbon energy schemes will contribute towards the mitigation of climate change. An Energy Opportunities Plan (EOP) incorporated within the North Hampshire Renewable Energy and Low Carbon Development Study (2011), demonstrates opportunities for low carbon energy generation potential, including wind, photovoltaic solar, biomass for direct combustion and anaerobic digestion and district heating with combined heat and power (CHP).

308. The District has significant local renewable resource potential and the EOP indicates favoured locations where opportunities might be viable. Development proposals should be in line with the EOP, though other locations or technologies are not precluded. Policy NBE10 identifies the main issues that are likely to be relevant when balancing the merits of any proposals for renewable and low carbon energy generation against any adverse impacts.

#### Policy NBE10 Renewable and Low Carbon Energy

**Proposals for the generation of energy from renewable resources, or low carbon energy development (with the exception of wind turbines) will be supported providing that any adverse impacts are addressed satisfactorily including individual and cumulative landscape and visual impacts. All such applications are subject to the following considerations:**

- a. proximity to, and impact on, transport infrastructure and the local highway network;**
- b. the impact on designated sites of European, national, regional and local biodiversity and geological importance;**
- c. the significance or special interest of heritage assets;**
- d. the impact on high grade agricultural land;**
- e. the impact on residential amenity including emissions, noise, odour and visual amenity; and**
- f. the degree to which the developer has demonstrated any wider environmental, economic and social benefits of a scheme as well as how any adverse impacts have been minimised.**

309. When assessing the impacts of a proposal for a renewable energy scheme we will consider the cumulative landscape and visual impacts of the development. Cumulative visual impacts may arise where two or more of the same type of renewable energy development will be visible from the same point or will be visible shortly after each other along the same journey.

310. New developments can be catalysts for decentralised energy network growth and major new developments should assess the feasibility of communal heat distribution to facilitate connecting to an existing decentralised energy network, or where this is not possible, establishing a new network. Opportunities should be

taken for appropriate technology to be incorporated into all stages of a building project at an early stage in the planning process.

## **Glossary**

**Climate Change:** A change in global or regional climate patterns, in particular a change apparent from the mid to late 20th century onwards and attributed largely to the increased levels of atmospheric carbon dioxide produced by the use of fossil fuels

**Renewable Energy:** Energy from natural resources that can be naturally replenished, such as sunlight, wind or rain. Examples of renewable energy technologies include wind turbines and photovoltaic arrays.

## Annex 2: NPPF

**Planning for climate change**

**153.** 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 <sup>53</sup>. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.

**154.** New development should be planned for in ways that:

(a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and

(b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the government's policy for national technical standards.

**155.** 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.

**156.** 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.

**157.** In determining planning applications, local planning authorities should expect new development to:

(a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having

regard to the type of development involved and its design, that this is not feasible or viable; and

(b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

**158.** 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 <sup>54</sup>. 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.

Footnote 54 states:

(54) Except for applications for the repowering of existing wind turbines, a proposed wind energy development involving one or more turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan; and, following consultation, it can be demonstrated that the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing.

## Glossary

**Renewable and low carbon energy:** Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels)