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Survey of local authority wind policies

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Survey of Local Authority Wind Policies

In June 2015 the government published a Written Ministerial Statement changing the planning regime as regards onshore wind development. The new guidance advises, 'local planning authorities should only grant planning permission if:

- the development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan; and
- following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.

Whether the proposal has the backing of the affected local community is a planning judgement for the local planning authority.'

The policy change is significant in that from its introduction; onshore wind projects can only be developed if either local planning authorities or local communities take deliberate action to "opt in" to accepting onshore wind by identifying suitable areas in planning policy. Outside of the identified areas and in districts which choose not to plan for wind, onshore wind projects will not get planning permission.

Furthermore the revised guidance places far greater weight on the need for public support, and for issues raised by local communities to have been fully addressed, increasing the risk of projects being refused even where they are proposed in areas identified as being suitable. In combination the policy changes place an effective moratorium on onshore wind projects without decisive and deliberate action from local councils or communities and increases the risk profile of the planning applications that are submitted.

This research seeks to determine how local planning authorities in England are responding to this change, the proportion that are planning for onshore wind developments in their areas, those who are devolving decisions to neighbourhood planning groups and the number of neighbourhood planning groups then progressing wind policies.

The research also seeks to understand how the revised guidance is perceived by local authorities and the wider strategies being pursued by Local Planning Authorities to promote renewable energy.

The research was conducted via means of email based survey to all local planning authorities in England. Ninety-two substantive responses were received, representing a response rate of about 20%.

NB The following questions have been left out of this analysis for the sake of brevity: Q1, Q5, Q9-10, Q13-14.

Q2. Is your authority planning work to adapt or develop planning policies in respect of onshore wind or renewable energy development in the light of this policy change? [mandatory question]

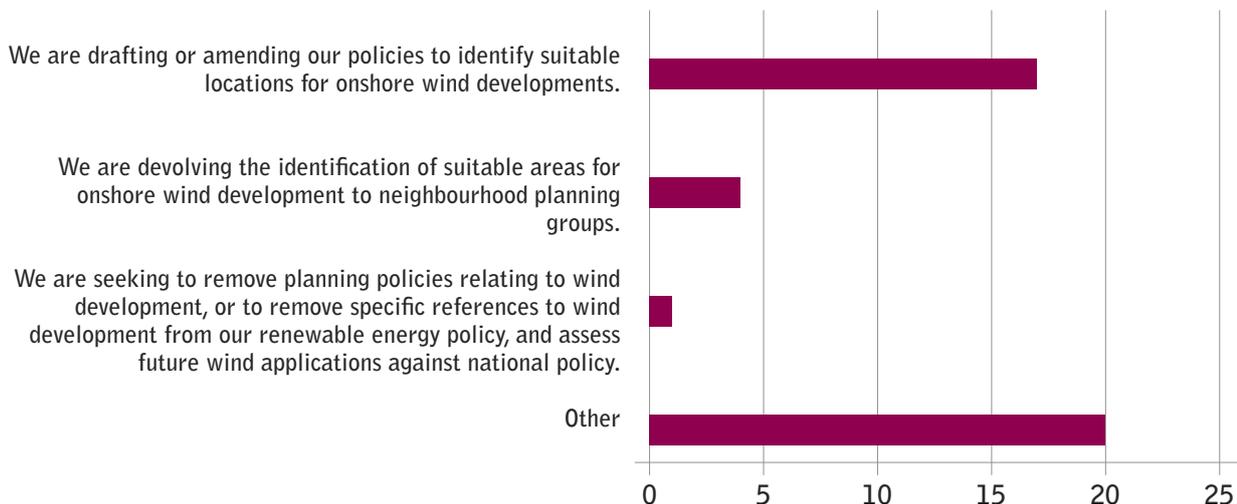
A: **Yes** [48 out of 92 responses]

B: **No** [44 out of 92 responses]

The 48 who answered yes (their authority was planning to adapt or develop wind policies) were then asked:

Q3. How are you amending or adapting your policies?

Of the 48 who answered yes to Q2, 43 responded to this question.

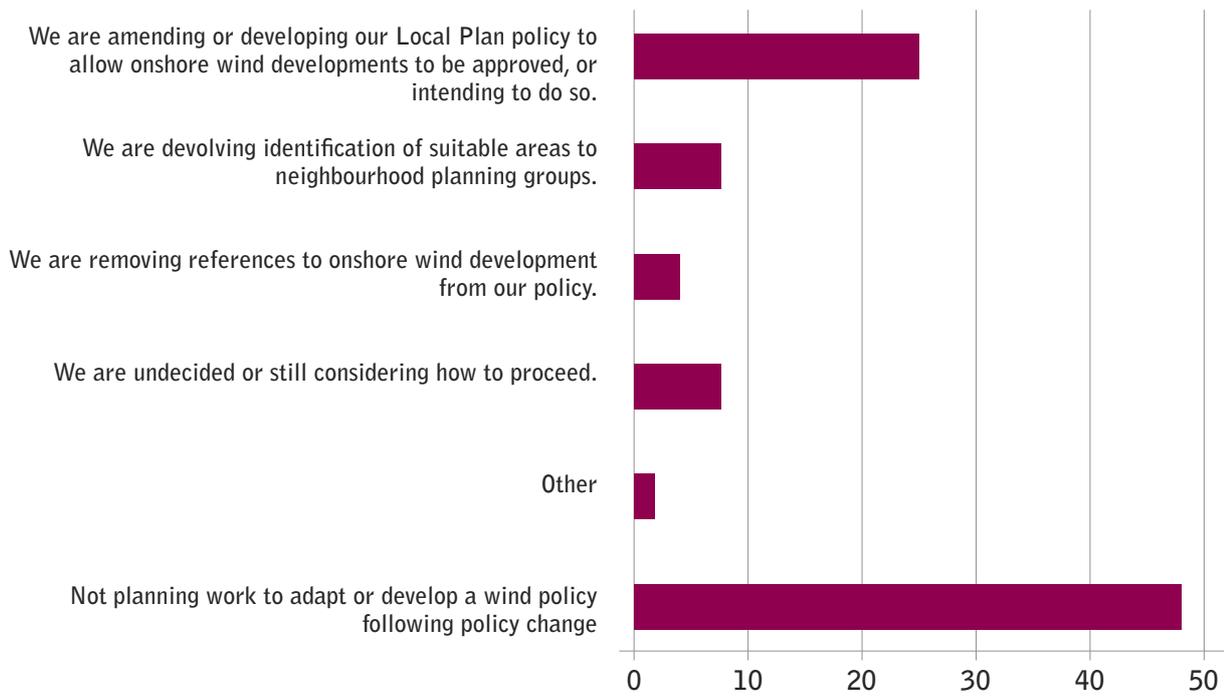


Eighteen of the 43 people who responded confirmed that they were drafting or amending policies to identify suitable sites for onshore wind, however the majority of respondents selected (D: Other) and provided comments to describe their situation in further detail.

To allow conclusions to be drawn we have developed a set of five categories, analysed the comments from respondents who selected "other" and re-allocated them (and the other responses) to the closest category, according to the comments they made.

The five revised categories are:

- 1: We are amending or developing our Local Plan policy to allow onshore wind developments to be approved, or intending to do so.
- 2: We are devolving identification of suitable areas to neighbourhood planning groups.
- 3: We are removing references to onshore wind development from our policy.
- 4: We are undecided or still considering how to proceed.
- 5: Other.



92 responses in total (including those respondents who in Q2 indicated that they weren't intending to develop or adapt their wind policy after the policy change)

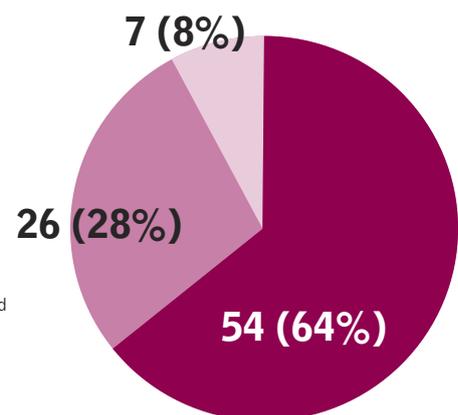
The graph above shows the results of this further analysis. For the purposes of comparison, it also shows those who indicated in Q2 that they weren't developing or adapting policies. As can be seen, 48 authorities are not planning work to adapt or develop a wind policy following the policy change and 25 authorities reported that their authorities were intending to amend or develop policies to allow onshore wind developments to be approved within their districts. A further seven authorities were intended to devolve decisions to identify suitable areas for wind to neighbourhood planning groups. A further seven authorities were intending to amend their policies but haven't yet decided how to proceed and a further four authorities were intending to revise their policies to remove reference to onshore wind altogether.

Subsequently in Q6, a further eight authorities confirmed that their existing policies already identified suitable areas for onshore wind development, and therefore there was no need to amend their policies or develop new policy in order to bring forward onshore wind developments.

Key finding

The graph below shows the proportion of local authorities in our survey with enabling policies where onshore wind could be developed¹, those authorities where onshore wind projects will not be developable², and the authorities that haven't yet decided how to proceed.

- Local authorities where onshore wind projects will not be developable
- Local authorities enabling onshore wind within their districts or planning to do so
- Local authorities intending to amend policies but who haven't yet decided how to proceed



1 This includes those authorities which are developing or amending policies to allow projects to be approved and those with suitable policies in place already.

2 This includes include those authorities who are not planning work to adapt or develop a permissive policy following the policy change, those authorities devolving decisions to neighbourhood planning groups and those amending their existing policies to remove references to onshore wind.

As can be seen, in less than a third of authorities surveyed (28%) will it be possible to bring forward onshore wind developments under the revised regime for onshore wind, without action by Neighbourhood Planning groups to identify suitable areas.

Comments from 4 of the authorities developing supportive wind policies suggest that their draft policies may fall some way short of the instruction within government policy to “clearly allocate suitable areas for wind energy development” in their Local Plans. The comments suggest these authorities are either developing criteria on what makes a location suitable or referring to a separate evidence base within which suitable areas are defined:

“Using national policy but also trying to provide some definition as to what makes a location suitable.”

“We have drafted a policy on wind turbine areas of search in our draft Local Plan.”

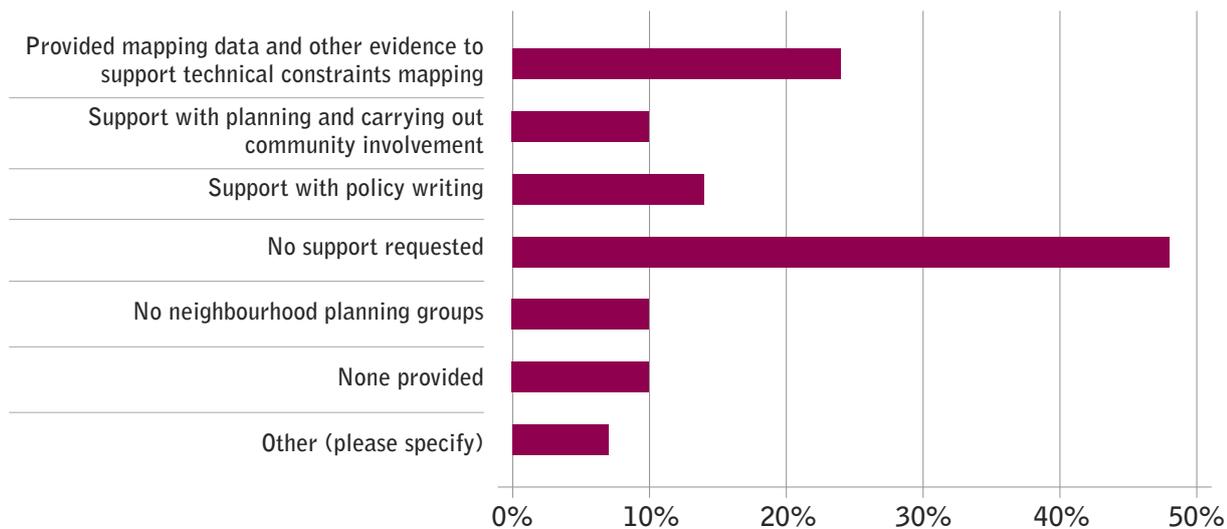
“We are better defining what makes a suitable location.”

“We have drafted a policy which refers to our evidence base which provides guidance on locations which may be more or less suitable for wind developments.”

It remains to be seen whether such policies will be seen as being compliant with national planning policy in Local Plan examinations, and if adopted, whether wind proposals could be approved using these policies.

Those authorities who answered in Q3 that they were devolving decisions to Neighbourhood Planning groups to identify suitable areas were asked:

Q4. What support have you given to neighbourhood planning groups to identify suitable areas?



Nearly half the respondents (48%) responded that no support had been requested.

This result is not surprising, in that whilst the planning guidance allows neighbourhood planning groups to identify suitable sites for onshore wind development, the majority of non-technical guidance in respect of neighbourhood planning doesn't encourage Neighbourhood Plans to address renewable energy issues. Therefore Neighbourhood Planning groups may either be unaware that this is an issue that they can look at, or have not been sold the benefits of doing so.

Whilst the basic conditions that neighbourhood plans have to comply with include a general injunction to promote sustainable development, there is no explicit requirement for neighbourhood plans to encourage renewable energy development or set out policies. There is also no explicit connection drawn in mainstream neighbourhood planning guidance groups between the general requirement to promote sustainable development within the basic conditions (e.g. that a draft neighbourhood plan or Order must meet if it is to proceed to referendum) for neighbourhood plan adoption, and the stronger requirement within the Planning and Compulsory Purchase Act (Section 19 of the 2004 Planning and Compulsory Purchase Act) for development plans (including neighbourhood plans) to contribute to the mitigation of, and adaptation to, climate change. Logically as part of the Development Plan, Neighbourhood Plans should be required to contribute towards our commitments to carbon emissions under the Climate Change Act.

Overall the responses and comments received suggest that the majority of local planning authorities polled are willing to provide specific support to neighbourhood planning groups if asked, including mapping, technical support and support with policy writing, but that the majority of authorities are taking a reactive approach and have not promoted renewable energy as an issue that neighbourhood plans could or should look at. Resource limitations and the current concentration of the planning system on housing supply issues may explain this.

An exception to this is Cornwall Council who have produced an encouraging Neighbourhood Plan to address renewable energy issues.

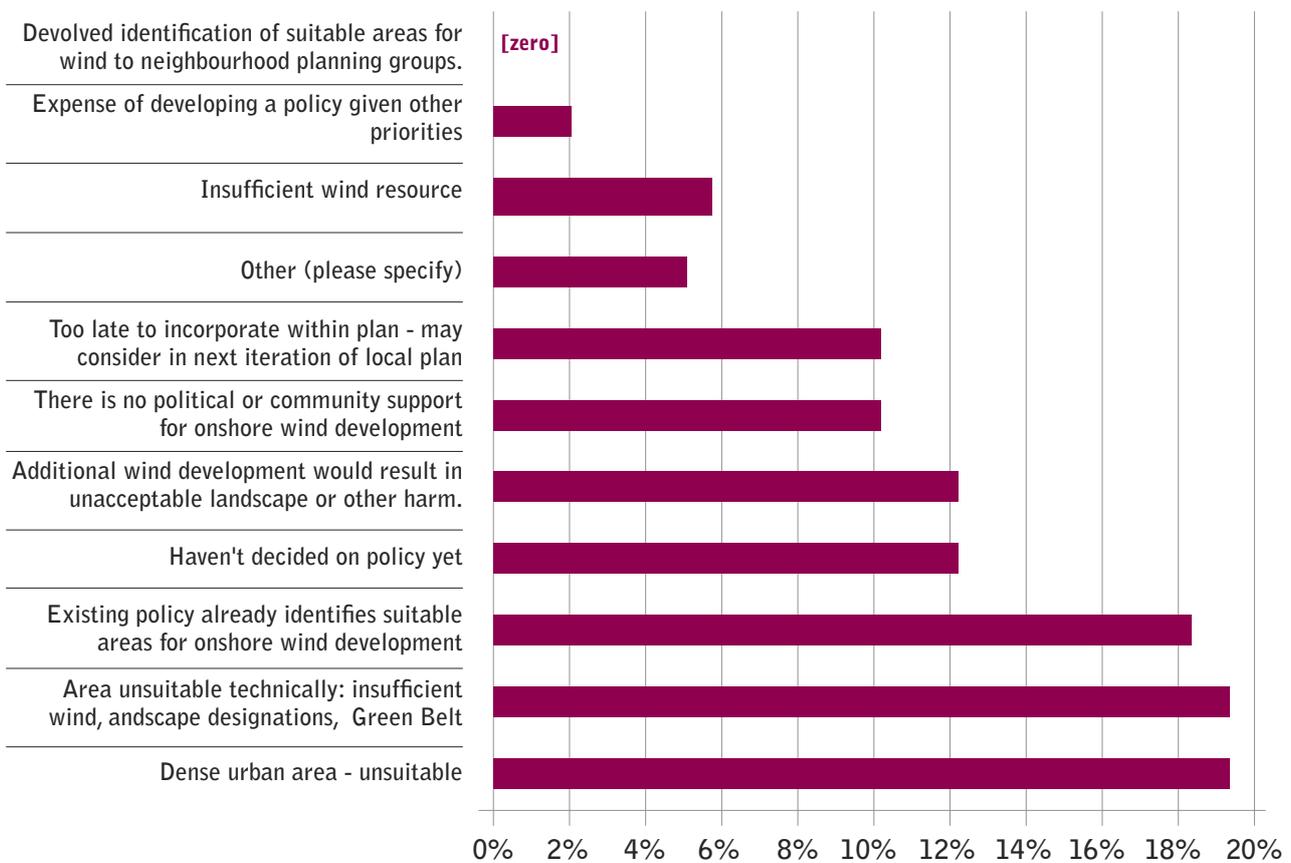
Of those authorities devolving decisions to identify suitable wind areas to Neighbourhood Planning groups, only Cornwall Council was aware of a neighbourhood planning group taking forward policies identifying onshore wind, Gwithian and Gwinear Neighbourhood Plan, currently at pre-submission consultations stage. (An anonymous survey response reported that Highams Park Neighbourhood Plan were also intending to identify suitable locations, but there is no evidence to support this.)

Outside of the survey, CSE are aware of three additional neighbourhood planning groups actively working on identifying suitable sites for onshore wind development, two of which are being given intensive support by CSE and RegenSW respectively.

The very limited extent of activity by Neighbourhood Plan groups suggests that onshore wind developments are highly unlikely to come forward through the neighbourhood plan process without proactive encouragement and bespoke assistance.

Those authorities who answered in question 3 that their authority was not planning work were asked:

Q6. If you are not planning to adopt a new or revised policy, why not?



As can be seen, 19% of respondents commented that their areas were technically unsuitable, either due to their urban context, or other landscape and technical planning constraints. Clearly in extremely dense urban authorities there may be no suitable land at all; however it is sometimes possible to develop wind turbines in urban edge locations or within industrial areas lacking close residential occupiers and other planning constraints.

Likewise, the Green Belt designation should not be interpreted as being an outright ban on onshore wind development. The NPPF advises (paragraph 91) that when located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development and in such cases developers will need to demonstrate very special circumstances if projects are to proceed. Planning authorities may also seek to demonstrate very special circumstances in choosing to identify areas of the Green Belt as suitable for onshore wind, particularly where other options are limited.

Regarding landscape constraints, 12% of authorities commented that they weren't identifying suitable areas due to cumulative harm with existing wind farm developments. A further two identified landscape constraints as reasons why they weren't identifying suitable areas.

Of the authorities polled, seven are designated as or include national parks, and interestingly, of these, five (Lake District, Peak District, Exmoor and Yorkshire Dales national park authorities and South Lakeland District Council) are have policies in place enabling onshore wind developments to come forward or are seeking to develop them. The two that don't are the national park authorities of New Forest and North York Moors.

22% of authorities responded that it was either too late to incorporate within the current iteration of their plan or that they hadn't decided on their policy yet.

Three authorities responded that there was no community support for onshore wind development in their authorities. These authorities were asked:

Q7. How do you know this to be the case?

This question was mandatory. The following responses were received:

"IBC has a tight administrative boundary within an urban area and available land is required for housing and employment uses. We have policy DM2: Decentralised Renewable or Low Carbon Energy: All new build development of 10 or more dwellings or in excess of 1,000m² of other residential or non-residential floorspace shall provide at least 15% of their energy requirements from decentralised and renewable or low-carbon sources. If it can be clearly demonstrated that this is not either feasible or viable, the alternative of reduced provision and/or equivalent carbon reduction in the form of additional energy efficiency measures will be required. The design of development should allow for the development of feed in tariffs."

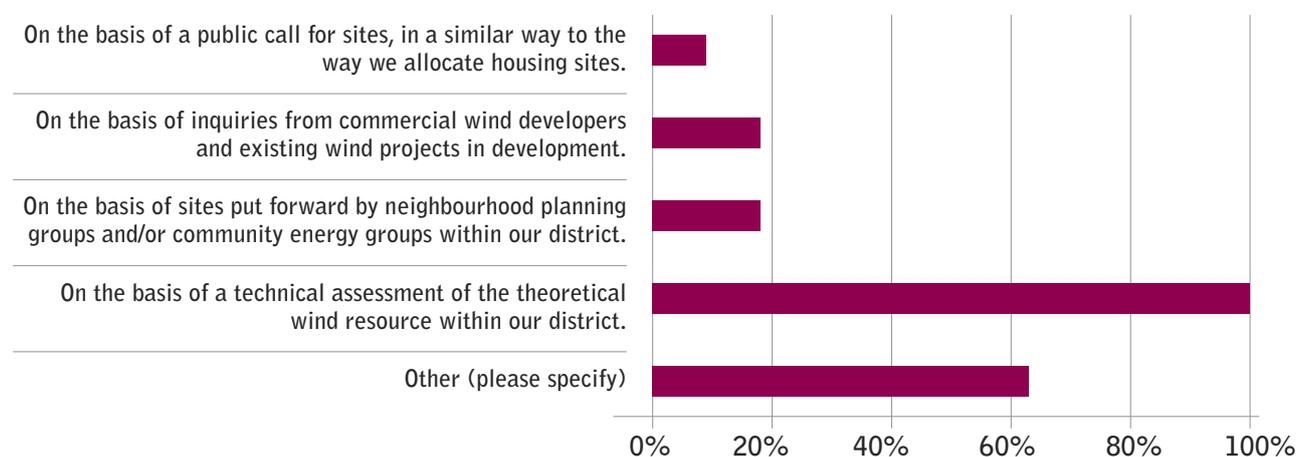
"Feedback from relevant persons"

"Significant resistance to applications for single turbines"

"Substantial areas of the District are constrained by Metropolitan Green Belt meaning there are few areas appropriate for developing on shore wind facilities and little public appetite for such development in these sensitive areas."

Respondents of authorities who were intending to identify suitable sites were next asked:

Q8. If you are identifying suitable sites for onshore wind, how are you going about this?



All respondents commented that they were planning to go forward by means of a technical assessment of the theoretical resource. Over 60% of respondents utilised the other box, to specify their intended course of action in further detail. The following comments were received:

“Any of the above may be used”

“On the basis of a landscape sensitivity study”

“Not applicable”

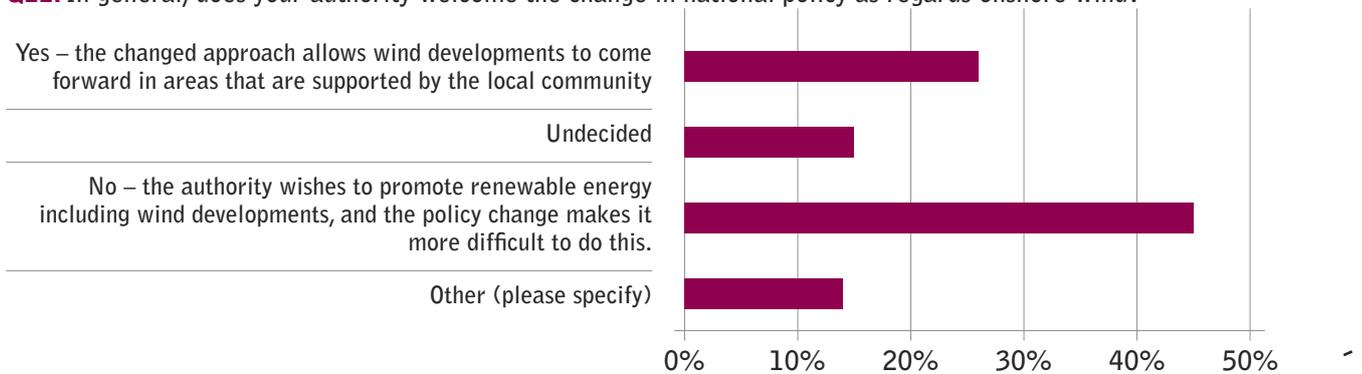
“Unknown - pre-production work is yet to begin on new Wind DPD

“Not sure yet”

“On the basis of landscape sensitivity of the identified Landscape Character Types within the National Park.”

“We are considering several options based on existing evidence of landscape and visual impact”

Q11. In general, does your authority welcome the change in national policy as regards onshore wind?



The majority of respondents were undecided as to whether the change was positive or negative. Fourteen % of respondents thought the change was welcome, allowing developments to come forward in supported locations. Slightly more respondents (15%) thought that policy change was unwelcome, making it more difficult to promote renewable energy in their districts.

Of the 21 respondents who commented “other”, seven commented on the difficulty in commenting on behalf of the authority as whole, nine respondents who were undecided or had no view, and six respondents thought the change was unwelcome. Four respondents comments on differences of opinion between officers and elected members opinions.

Their full responses are set out below:

Some Members have been keen to investigate the potential to limit new turbines generally (prior to the written ministerial statement), others more ambivalent. Generally, neighbouring residents have opposed many schemes. Officers approached assessment of renewables fairly against the appropriate policy. As this Council has also endeavoured generally to carry out annual monitoring of renewable energy commitments over the years, the dearth of committed installed capacity has been obvious. The change to wind policy has perhaps stifled growth generally in renewables across our District; but it could also be argued that this has added fresh impetus to stand alone solar farms proposals instead (we've had a few in recent years). Was this 'side effect' of the wind energy policy change foreseen by the Government? Are solar farms less contentious? Past proposals have been controversial but the changed approach does make it difficult for schemes to come forward”

“Personally I don't as it's a step away from sustainable energy, but I cannot speak for the authority.”

“Cornwall Council actively promotes renewable energy, but recognises the need for develop to be well sited and within the capacity of the local environment. The Council particularly supports community-owned energy and this approach adds further barriers to our communities' ability to provide sustainable solutions to their own energy needs.”

“There does not appear to be strong feeling either way - the authority has already delivered what could be considered its fair share of wind energy development and the number of applications for commercial scale has dramatically reduced in recent years, including before the change, so it hasn't affected us much and thus, there is limited talk of it”

“The National Park Authority had included policies which supported small scale renewable energy developments, including small scale wind turbines up to a maximum of 20m to the rotor tip. The changes simply mean that we have defined suitable areas based on landscape sensitivity and therefore the areas which are considered to be unsuitable for wind turbines would have almost certainly have been effectively screened out by the policy tests. The amendments to the policy to define suitable areas essentially mean that we are being more precise in the location of such development.”

“The authority has not expressed a view but privately I know key Members welcomed the change, but professionally I think it is one of the worst changes to planning policy I am aware of”

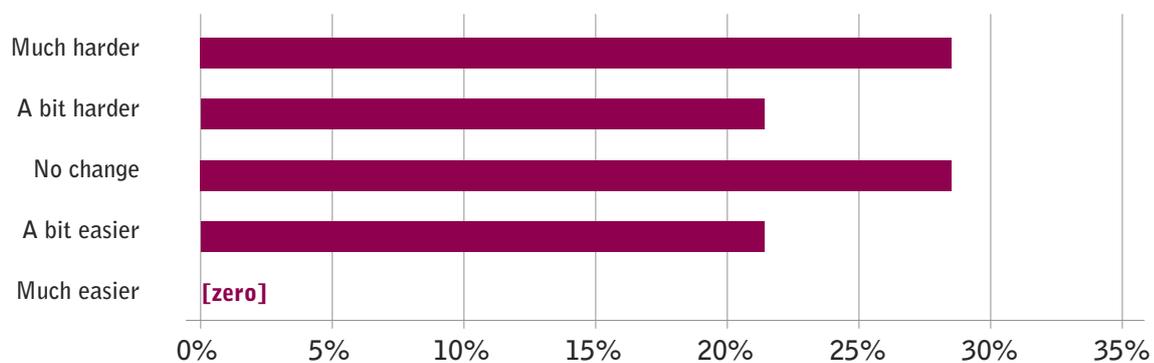
“The change isn't relevant to us however, if it was, we would see it as a hindrance.”

One of the respondents who had removed reference to wind from their policy were forced to do this as a result of unfortunate timing, in that they published their Local Plan at the same time as the Ministerial Statement was issued, had insufficient time to identify suitable areas and were forced to remove all reference to wind energy in order to get it through the examination and avoid it being found unsound. They commented further:

“As a National Park, we presumed against commercial scale wind, but wanted a flexible approach to smaller scale wind development. As a result, we have to rely on the Ministerial Statement, and given that our Plan does not allocate areas suitable for wind energy, we in effect have a temporary ban on wind turbines of any scale or type, until such time as we are able to draw up areas suitable for wind. We find this blanket imposition of policy, applicable down to the level of a single turbine, to be very unfortunate. It removes discretion for responding to local circumstances - our policy was formulated in the proper way, in consultation with local people and other bodies, yet it has been trumped by the Ministerial Statement and puts authorities like our own in an impossible position.”

Next, respondents were asked specifically about the impact of the changes on community-led or owned projects being brought forward.

Q12. Does your authority believe the changes make it more or less easy for community-led or owned projects to be brought forward?



The results show a clear weighting towards community-led or owned wind projects being thought more difficult to bring forward under the revised policy regime.

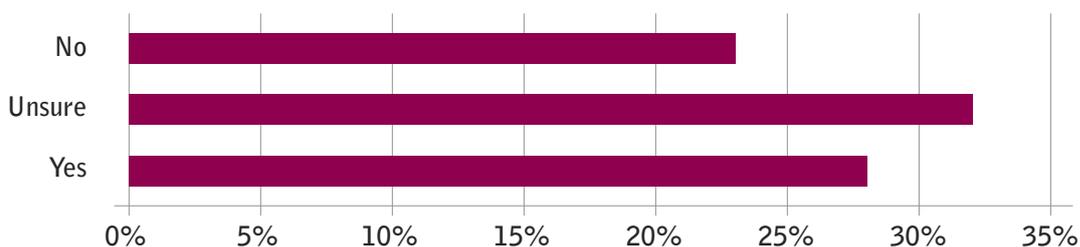
This reflects CSE's experience of community energy projects.

Prior to June 2015, a community energy group developing an onshore wind project could do so just by lodging a planning application. The change to the planning regime, introduces the requirement for the site to be within an area identified as being suitable within a Local or Neighbourhood Plan policy.

Given the general lack of adopted policy at local authority level, this invariably requires the community group to first develop and adopt a neighbourhood plan with a supportive policy before they can prepare and submit a planning application, significantly lengthening the time and effort needed to develop their project. Even having adopted a policy, there is no guarantee that their subsequent planning application will be approved.

Next, respondents were asked about the application of the policy tests within the revised guidance to planning applications. We gave

Q15 | Are you confident that you understand how the requirement from the Ministerial Statement for planning issues to be 'fully addressed' is to be met by applicants for onshore wind developments?



NB The Ministerial Statement advises that local planning authorities should only grant planning permission if the development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan, and, following consultation, that it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing. (Whether the proposal has the backing of the affected local community is a planning judgement for the local planning authority.)

Less than a third of authorities felt confident that they understood how the requirements for planning issues in respect of onshore wind developments to be 'fully addressed' was to be met by applicants for onshore wind developments, with 32% being unsure and 23% not feeling confident. A further 18% of respondents instead chose to add commentary in the comments box.

"This needs testing at appeal."

"This aspect is clearly still up for some debate given the outcome of appeals across the country."

"Personally I am not sure anyone understands how it is to be met. There have been varying interpretations from Inspectors and the Secretary of State has generally taken a very hard line with applications captured by the transitional arrangements. Unless someone legally challenges one of these decisions so we can a definitive legal judgement this uncertainty will remain especially as less and less applications will now be determined as so few LPA's have designated areas."

"We think we know but appeal decisions/call-ins are very strongly weighted towards virtually any impacts being a reason for refusal."

"Secretary of State's view may differ from Local Planning Authority or Planning Inspectorate."

The comments expressed a range of interpretations of what fully addressed meant, and of the interplay between the dual requirements for planning issues to be fully addressed, and in the need for community backing.

"Demonstrating that planning impacts have been fully addressed does not mean having a community's backing"

"Would all the potential impacts have to be identified by the community upfront in their plan in order for them to be addressed?"

"I would take it to mean that issues raised by communities have been resolved to the point where the communities are happy for the proposal to progress, whether this is realistic or the right thing to do for the greater good is another matter."

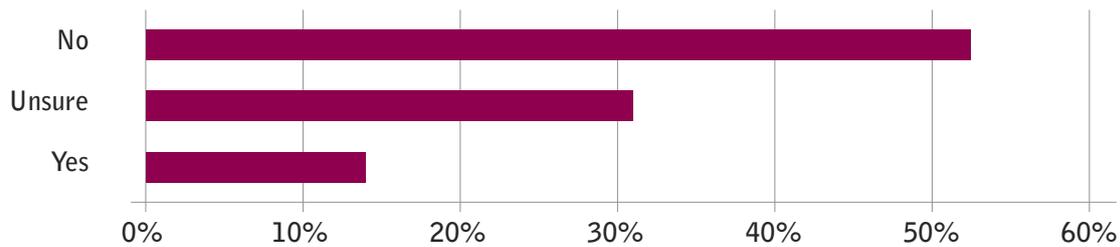
"Professionally I think I am clear on what it means but I sure that will differ from what many of the public think it means."

"We will be sure by the time we review the Local Plan."

"Consultants are undertaking a study into renewables in West Oxfordshire and will be addressing this issue."

One response suggested that within this national park authority, this requirement was unlikely to be problematic.

"Within the National Park, planning permission has only been granted for small scale wind turbines (up to 20m to rotor tip). Such turbines are usually on farmsteads and there has generally been little opposition. We work closely with the applicants to ensure the siting and colour of the turbine has minimal impact on the landscape and visual amenity."

Q16 Do you regard this requirement as being sufficiently clear to allow decisions to be made predictably?

From 80 responses, 52.5% did not think the requirement for planning issues to be “fully addressed” was clear enough to allow decisions to be made predictably, with 31% of respondents being unsure and 14% commenting that the requirement was clear. Ten explanatory comments were added.

Two responses commented:

“it is part of the planning balance”

“decision making will be reliant upon the knowledge of the decision makers as always within the planning system.”

The majority of the comments however raised concerns about the lack of clarity for decision makers and predictability for developers.

“It makes it impossible for the developer to know if they have done what's required”

“Wording of the new approach with regard to community impact is vague and does not assist clear decision making.”

“Most application would need to be considered by our Development Management Committee. I don't think the requirement is sufficiently clear that Member decisions could be predicted.”

“Even if the requirement was clear, the result would not be predictable as every community will have slightly different concerns and different views as to how they should be address and what constitutes addressing them fully”

“The Ministerial Statement appears to be a purely political response to a particular type of rural constituency”

“It is very difficult for LPA's to make a ‘planning balance’ - the bar is far higher than for other types of development”

From the perspective of Local Authority officers, the responses and comments reflect clear concerns that the requirement for planning issues to be “fully addressed” was not clear, in terms of how this requirement should be tackled by applicants, and in how decisions should be made by planning committees.

This survey did not seek the views of the wind industry or of people who have had applications for onshore wind developments determined since June 2015, therefore the perspective on the wind industry (and of community energy groups) is unknown.

However, the revised guidance is likely to make the outcome of wind applications *less predictable* by introducing additional stages at which onshore wind projects can be turned back or de-railed.

For example, prior to Wind Ministerial Statement, wind applications could be turned down at planning application submission or at appeal on the basis of conventional planning issues (landscape, visual, heritage impact, traffic, noise etc). Following the Wind Ministerial Statement, there are many more turn-back points. These include the referendum or examination following the the preparation of a neighbourhood or local plan, or additional policy tests following planning application submission or appeal (e.g. have planning impacts been “fully addressed” and has community backing been adequately demonstrated).

The guidance requires Local Authorities of Neighbourhood Planning groups to proactively identify areas as suitable for onshore wind, but even where they have done so, planning applications are still required to “demonstrate community backing” and that that planning impacts have been “fully addressed”. Therefore, even when a planning application for an onshore wind development is submitted within an area identified as being “suitable”, the outcome of the application may still be unpredictable. The overall effect of the change is therefore likely to be to raise the risk profile of onshore wind developments significantly.

Q17 Has your authority adopted (or is it developing) a policy target to achieve a minimum amount of renewable electricity or renewable heat capacity by a specific date?

Seventy-nine out of 92 respondents answered this question. Eleven (14%) answered ‘yes’, sixty-eight (86%) answered ‘no’.



Respondents were then asked:

Q18. What targets have you set out?

Nine respondents confirmed the targets that they had adopted (or were developing) as follows:

	Overall target for renewable energy (MW)	Renewable heat (MWth)	Renewable electricity (MWe)
Bath and North East Somerset Council	275	165	110
Swindon Borough Council	Low carbon electricity target of 200MWe by 2020		
Leeds City Council	80 MW by 2026		
Sheffield City Council	60MW by 2021		
Wakefield Metropolitan Borough Council	11 MW by 2010 and 41 MW by 2021 which have both been achieved in this plan period		
Charnwood Council	27.5		
Pendle Borough Council	27.2	15.4	11.8
Rosendale Borough Council	R22MW		22Mw
Isle of Wight Council	Up to 10MW by 2027		

Q19. How were these targets developed?

There were only six responses to this question. Four local authorities said that their targets were set by means of technical assessments of renewable energy capacity while two stated that their targets were set to meet the Renewable Energy Directive targets (15% of energy consumption from renewable energy) within their districts.

Q20 Do your planning policies regarding renewable energy form part of a wider strategy to increase the installation of renewable energy in your district to meet national and international targets?

Seventeed respondents skipped the question. Just fewer than half the respondents (49%) answered no to this question; their policies did not form part of a wider strategy to increase renewable energy installation.

Collectively, the responses to questions 17 to 19 raise questions and concerns about the links between the national legislative commitments around renewable energy generation and local authority policies. The EU renewable energy directive commits the UK to increasing renewable energy production to 15% of consumption by 2020.

The responses suggest that only a minority of local authorities have a policy target for renewable energy generation, and in the minority of cases where targets are set out, these are in the main divorced from the Renewable Energy Directive target at a national level.

Q21 In brief, what are the main features of your strategy?

Forty-seven people responded to this question, with 45 people skipping it.

Respondents were given a text box in which to respond, and then their responses were analysed for common trends. A high proportion of respondents (21 out of 47 responses) reported generally supportive criteria based policies for stand-alone renewables. Only a relatively small proportion of respondents (6 out of 47) reported policies which actively promoted specific forms of stand-alone renewable energy technologies within their areas and / or investigated and identified renewable energy resources.

Also popular were building-based policies to renewable energy, for example what are known as "Merton Rule" policies. Just under a quarter of respondents reported having "Merton" rule policies, requiring a minimum proportion of regulated energy consumption to be generated on-site from renewable energy.

Six responses reported policies supporting community led or owned renewable energy projects and 4 respondents reported policies requiring developments to link into district heating systems.

In total 18% of respondents had either yet to develop a strategy, had an out of date local plan, policies that encouraged (rather than required higher standards) or reported that renewable energy was not a high priority.

The National Planning Policy Framework (para 97) requires local authorities to have a positive strategy (my emphasis) to promote energy from renewable and low carbon sources and design their policies to maximise renewable and low carbon energy development while minimising adverse impacts. Local planning authorities should also consider identifying suitable areas for renewable and low carbon energy sources.

The question asked authorities to report the main features of their renewable energy strategies and was a minor part of a wider survey, so it's likely that the responses under-report the action on behalf of local authorities in promoting renewable energy and / or don't reflect the full range of that authority's strategy.

However, the results suggest a very wide spectrum of action on the part of local planning authorities in response to these requirements. The majority of authorities would appear to have an essentially reactive set of development control policies giving general encouragement to renewable energy proposals. Some authorities however have much more proactive strategies, giving policy and practical support to specific types of renewable energy developments with non-statutory initiatives to promote renewable energy development and strong development control policies requiring on-site renewable energy generation.

Some of these comments are suggestive of truly positive strategies to identify and promote the range of renewable energy options available within that authority:

"Inform 50% of off-gas householders and businesses about the Renewable Heat Incentive. Provide support and advice to 200 businesses on Renewable Energy."

“Promotion of 10 community energy projects”

“All public bodies to have investigated feasibility of renewable energy on their building stock, commissioned projects where viable and publicly supported, and communicated this initiative within their communities National Health”

“Support Local Planning Authority officers to develop appropriate and consistent position on renewable energy applications through Shared Sustainable Energy Planner resource, evidenced through Local Development Documents”

“Encourage creation of local energy market to maximise retention of the value of energy transition within the local economy.”

“Encouraging use of local woodfuel”

“Formation of a council owned power supply company to deliver mainly solar power generation on Council owned land”

The apparent wide variation in renewable energy strategies is likely to be due in part to the disconnect between the specific national targets for the installation of renewable energy and the general encouragement in the NPPF to Local authorities to “maximise renewable energy installations”. Whilst the renewable energy directive sets a specific target that by 2020 the UK should install sufficient renewable energy to meet 15% of consumption, there is no requirement for Local authorities to set equivalent local targets and no formal requirement to monitor renewable energy installations spatially across the country. (Contrast the approach to housing, where local authorities are required to plan for a 5-year pipeline of housing sites to meet local needs, are assessed on deliverability and must report annually on progress towards this end.)

Additionally, to date we are unaware of Local Plans being found unsound due to their approach to renewable energy, despite the wide variations in approach we have found, with the examination process concentrating overwhelmingly on housing supply issues.



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