

Response from the Campaign to Protect Rural England Nottinghamshire to the Kingston solar energy development proposal 22/00319/FUL

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Please contact

Bettina Lange

Policy Adviser

CPRE Nottinghamshire

bettina.t2000@btinternet.com

CPRE Nottinghamshire objects to the application because:

1. the case has not been made effectively by the applicants that the protection of the Green Belt should be overridden by very special circumstances
2. the proposal will not make the right contribution to energy security
3. the proposal will not achieve the protection for Rights of Way the applicants claim it will

1. Protection of the Green Belt

Although the applicants correctly point out that “very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources” (NPPF 2021 paragraph 151), this is not to be understood as a catch-all override of the principle that the Green Belt should be protected. If it was, there would be no point in having this principle in the NPPF or in including Green Belt policies in Local Plans because any renewable energy project could always override these on the ground that more energy needs to be generated from renewable sources to respond to climate change.

The ‘very special circumstances’ test includes a number of specific criteria, in particular that the Local Planning Authority has to demonstrate that all “other reasonable options for meeting its identified need for development” have been examined, which includes making “as much use as possible of suitable brownfield sites and underutilised land” (NPPF 2021 paragraph 141). We are not aware this has been done – is there really no other option for siting solar panels ? no roofs of buildings including industrial buildings ? Rushcliffe has for example a number of new industrial buildings e.g. on the outskirts of Bingham, which would seem suitable for solar panels (see also CPRE’s policy on solar energy below).

2. The right contribution to energy security

The applicants quote Policy 2, subsection 5 of the Rushcliffe Local Plan in their Planning Statement (at 1.77) :

“The extension of existing or development of new decentralised, renewable and low-carbon energy schemes appropriate for Rushcliffe will be promoted and encouraged, including biomass power generation, combined heat and power, wind, solar and micro generation systems, where these are compatible with environmental, heritage, landscape and other planning considerations.”

Yet there is no indication that the proposed development will in fact be decentralised. As far as we are aware, the intention is to feed the energy generated into the centralised grid. The current centralized model of energy generation and distribution is not resilient or future proof. Significant weather events or technical problems can lead to outages for a large number of people, for example.

3. Rights of Way

The applicants list the bridleways and public footpaths across or adjacent to the site of the proposed development (Planning Statement 1.2.1) and then claim that the proposed fencing protects these better than they are currently protected (at 1.121). The specification of the fencing is as follows :

“The design includes the provision of secure fencing running around the perimeter of the Proposed Development. The fence will consist of timber posts and deer fencing measuring to 2.4m in height with a 0.1m gap at the bottom.” (Planning Statement 1.45)

The kind of ‘protection’ offered by fencing over 2 m high is appropriate only if those using recreational paths prefer walking or riding along a prison corridor. Part of the attraction of public RoW is the openness of the countryside they lead across – which would be destroyed by the development and its surrounding fences.

The national CPRE policy on solar energy is included below for information.

The national CPRE approach to solar is as follows :

The generation and supply of low carbon energy will be core to achieving our goal of net zero carbon emissions by 2045 or earlier. This will require a transformation of our energy system over the next 20–30 years. The scale and immediacy of the threat to the climate and our countryside means that change is necessary now. The countryside will have a key part to play in delivering that change. This will bring with it benefits, but also challenges such as an increased amount of land being needed for renewable energy technologies.

The current model of renewable energy development has resulted in some poor outcomes for landscapes, the environment and rural communities. CPRE wants to change this and believes it is possible to achieve the net-zero transition, including the introduction of new solar and onshore wind developments, in harmony with our wider environmental and social objectives. To achieve this, however, the model of development and planning must be radically different.

This means taking a strategic planning approach to the development of renewable energy assets at national, sub-regional and local levels and ensuring that local communities are empowered to help shape their local energy response. CPRE will require that new onshore wind and solar developments minimize impacts on landscapes, tranquility and heritage, through decentralization and appropriately-

scaled development; bring net benefits to wildlife; benefit the rural economy, form a cornerstone of local enterprise and jobs; and are supported or owned by local communities.

Renewable energy generation and climate change mitigation must also be maximized within urban areas and priority given to using previously developed land, in line with CPREs 'brownfield first' policy.