Kent Downs Area of Outstanding Natural Beauty (AONB) Renewable Energy Position Statement

September 2008
Updated April 2010 and June 2011

Background

Climate Change is already having an important impact in Kent. Research carried out by Kent County Council shows that in the last ten years Kent has experienced 50 extreme weather events with an estimated cost to the Kent community of £440m.

Climate Change will have an important impact on the special qualities of the Kent Downs AONB. This is confirmed by recent studies carried out by ADAS on behalf of the South East Protected Landscapes.

In the short term the impact on the Kent Downs landscape is anticipated to be through the impact of adaptation and mitigation strategies. These might include changing cropping patterns, crops and growing techniques, increasingly marginal grazing particularly for dairy, provision of water storage and changes to buildings as well as the provision of renewable energy sources. In the medium and long term the climatic changes themselves will have a greater impact on the qualities of the AONB, particularly if mitigation efforts are unsuccessful. **The Kent Downs AONB Joint Advisory Committee therefore supports the need for renewable energy sources as part of the mitigation response to climate change.**

Renewables as mitigation for climate change

There is a major growth in interest in applying renewable energy technology to energy supply as part of the mitigation strategies for climate change. Renewable energy supply can be generated at all levels from individual households to major installations.

The Government has set a target of 10% of electricity supply from renewable energy by 2010. European Union leaders have agreed on a binding target of 20% of EU energy consumption to come from renewable sources by 2020.

The Kent Downs AONB partnership agrees that it is right for the AONB landscape to make an appropriate contribution to meet these targets and that the Kent Downs landscape has considerable potential to contribute to providing renewable energy supplies.

It is essential to use evidence to manage this change and seek sources of renewable energy which are actually effective at reducing green house gas emissions and those which can support, rather than detract from, landscape character. The most appropriate tool to help guide this change is to prepare a position statement to help.

Purpose and status of this position statement
The purpose of this statement is to provide a clearly articulated position for the Kent Downs AONB partnership with regards to renewable energy technologies. In a planning context, it recognises that each Local Planning Authority balances the impact of renewables proposals on the AONB against all of the other material planning considerations. Additionally this position statement is to:

- guide and inform the potential use and provision of renewable energy sources in the Kent Downs
- consider how the landscape impact of different forms of renewable energy can be assessed
- help to encourage the reduction of energy consumption as the first step through encouraging sustainable design and construction
- help inform the review of the Kent Downs AONB Management Plan
- add value and clarity to existing policy

This position statement was adopted by the Kent Downs AONB Joint Advisory Committee in May 2008.

National and regional policy
Essentially policy guidance strongly promotes the use of renewable technology at all levels and recognises the sensitivities of the impacts but does not specifically exclude nationally important landscapes.

In the context of the policy framework it is important to add local detail to try to influence and direct renewables energy choices in the Kent Downs AONB

Potential use and provision of renewable energy sources in the Kent Downs

Kent Downs experience
The AONB Unit has worked closely with the Kent Energy Centre and Creative Environmental Networks on a Sustainable Development Fund project to promote renewables for tourism businesses, schools and other public and private sector organisations in and near the AONB.

A wide variety of businesses and organisations were visited to assess the most effective source of renewables. The most common recommendation was for wood fuels, but wind turbines, solar, ground source heat and hydro systems were also recommended. We therefore need to consider a wide variety of renewable energy sources in this position statement.

Renewables in the AONB
Working in an AONB, a sensitive environment, requires creativity to ensure renewable energy developments are of an appropriate scale, location and design in relation to the character of the landscape and its setting. It requires innovation in the use of technology too. The AONBs aim is not just to conserve, but to enhance the qualities found within them.

The starting point is to consider the role that the AONB landscape has as a whole in promoting sources of renewables that also support landscape quality. This should be the clear priority.

A companion report 'Climate Change mitigation: renewable energy technologies and protected landscapes: Identification of key constraints and opportunities for renewable energy within the Kent Downs AONB' considers various renewable

energy sources, their potential impact and a proposed appropriateness for the Kent Downs AONB.

We recognise that renewable energy is evolving all the time and other routes to providing renewables will be proposed. These should be judged in a logical sequence to ensure that there is a positive effect on reducing green house gas emissions and making best use of local resources as well as considering their potential impact on the landscape of the Kent Downs and its setting.

Considering renewable energy development proposals

The basis for considering renewable energy proposals in the Kent Downs AONB and its setting is that the purpose of the proposal is primarily to reduce the amount of green house gasses to help mitigate the impacts of climate change.

It is important that this defined purpose of the renewable energy proposal is fulfilled; this means that the first test for any renewable proposal should be that it is effective in reducing green house gasses when the whole life cycle is considered.

Where a significant overall reduction in greenhouse gas emissions can be demonstrated then other considerations should be taken into account.

Developers of medium and large scale renewable energy schemes should be required to explicitly set out the impact of their proposals on the special qualities of the AONB and how these would impact on the AONB.

In reaching a view about potential developments, the AONB partnership will expect that each application is examined (whether inside or outside of the AONB and irrespective of the type of renewable energy) on a case by case basis, governed by the policies/criteria in relevant Local Development Frameworks (LDF), landscape character assessments, the Kent Downs AONB Management Plan and this position statement.

Promoters of medium and large scale renewable energy developments should prepare environmental assessment and landscape impact well before any planning application and demonstrate how they would provide long-term, sustained support to the economic and social well being of the local community.

All proposals will need to clearly demonstrate how conservation and enhancement of the area will not be compromised and satisfactorily address the potential impacts, particularly with regard to landscape character, views and setting. In particular, the Kent Downs AONB partnership will seek evidence that an adequate site selection process has been carried out, including proper consideration of alternative sites and options outside the AONB, and justification for the chosen site. Alternative sources of renewable energy and energy should be considered too.

It is noted that the Supplement to PPS1 on Climate Change requires a significant proportion of the energy supply of new development to be gained on site. Therefore where renewable technologies are employed to generate this, a separate site selection process would not be appropriate, however the careful choice of renewable energy technologies (seeking to use those which support landscape character) remains a key consideration.

The AONB partnership will expect the examination of the cumulative effect of proposals and of the associated infrastructure - both in combination with other

power generating developments, existing developments, and in relation to grid connections and other infrastructure.

Wind turbines
The basic tenet of this position statement is that there are many sources of renewable energy available and often these can have a positive or neutral effect on the special qualities of the AONB landscape. Despite this, most attention to date has been on large scale wind developments although none have yet been proposed for the Kent Downs AONB. The wind profile map for the Kent Downs AONB makes it a landscape which could be subject to wind turbine proposals.

Large scale wind turbine developments have been highly controversial with views being polarised. The Government believes that both on and offshore wind will contribute 7-8% towards the 10% target for 2010. The industry has estimated that an additional 2,000 onshore turbines would be needed by then and government has announced an anticipated 4000 onshore turbines by 2020.

Owing to the high sensitivity of the Kent Downs AONB the AONB partnership believes that large scale commercial wind turbine developments will be unacceptable. The national test for major developments should be applied and national need as well as lack of alternative site as well as, in this case, alternative technology, will have to be proven.

It is considered that small to medium scale wind turbine proposals in the AONB are unlikely to be acceptable if the tests established in this position statement are applied. The AONB partnership considers that the assessment for wind turbine developments should address the following issues:

- demonstration of actual reduction in green house gasses as a result of the development
- demonstrate how conservation and enhancement of the area will not be compromised
- consideration of the number, size, design and colour
- impact of generator noise
- the effects of related infrastructure, such as access roads and grid connection
- issues surrounding decommissioning
- any cumulative impact on the landscape
- demonstration of community support and
- consideration of alternative renewable energy sources

In all cases visual analysis should be required to ascertain turbine visibility from within and outside the AONB, and opportunities for the mitigation of effects.

The AONB partnership recognises that the design of wind turbines is evolving and that future proposals may significantly reduce the likely impacts as well as more effectively reduce green house gasses.

Photovoltaic Arrays
Field–scale photovoltaic offer an economically viable form of commercial renewable electricity and over time can make a contribution to CO_2. However, in this nationally protected landscape characterised by a farmed character and flowing Downland with wide panoramic views it is extremely unlikely that any location could be found in or within the setting of the AONB where field-scale photovoltaics would not have a significant adverse effect on the landscape and the sense of remoteness, natural beauty and landscape character for which the Kent Downs are valued. Such installations would directly conflict with the purpose

of the designation and statutory management plan objectives for this protected landscape.

Positive Action
It is important that the AONB partnership seeks to take positive action to promote renewables choices which are demonstrably effective at reducing greenhouse gasses and support the landscape character of the AONB. Most particularly this effort should be focused on the promotion of the re-establishment of coppice management to the woodlands of the Kent Downs through promoting wood fuels.

Promoting wood fuels
Woodland accounts for 21% of the AONB landscape, the second largest land use. Almost 70% of this woodland is ancient woodland much of which is coppiced with a predominance of sweet chestnut coppice.

Governments' wood fuel strategy aims to bring an additional two million tonnes (Mt) of wood into the market, annually, by 2020 saving 400,000 tonnes of carbon every year. (The equivalent of 3.6 million barrels of crude oil and enough to supply 250,000 homes with energy). To achieve this target the focus will be on the potential wood resource available in the 60% of English woodlands that are currently under-managed.

The AONB Partnership considers that the coppice woodland of the Kent Downs is an important target for wood fuel based renewable energy generation and that it is important to intervene to make the most of this opportunity. The near location of two growth areas makes the opportunity for the development of a wood fuel industry, which supports sustainable woodland management, more realistic.

Promote other sources of renewable technology
The AONB partnership should support small and medium scale appropriate renewables in the Kent Downs where they provide a measurable reduction in green house gasses and support landscape character or do not detract from it. The companion report to this position statement discusses each renewable energy technologies and a proposed appropriateness to the Kent Downs AONB for each type identified.

Promote sustainable design and construction.
Through policy advice the AONB partnership will promote the highest standards of energy conservation and sustainable construction in new developments. The AONB Unit will be developing a buildings design guide which will address these matters. In the meantime we seek that LDF policies promote sustainable design and construction recommending at least BREEAM Very Good for new buildings and Code for Sustainable Homes Level 4 for new houses.

Turning intentions into actions
The AONB Management Plan review process will take the intentions from this position statement and confirm them as detailed actions in the Action Plan. The existing policies and actions of the 2004 Management Plan stand but can be refocused in the light of this statement.

Community based proposals
There may be cases where communities seek to generate their own energy. Schemes based on clear community desires may appear more acceptable than those purely for commercial gain. This being said, caution should be exercised as

financial cost/benefit, particularly where grants are made available, may favour some technologies which are less appropriate for the landscape. The most economic short term choice may not be the most appropriate for a community scheme.

In the case of community based proposals, the same tests should be applied as to other proposed renewable energy schemes. Priority should be given to schemes which support AONB landscape quality and which are effective at reducing green house gas emissions. Schemes which promote energy conservation, wood fuels, solar and ground source heat are most acceptable.

Review

It is important to recognise that renewable energy technology is fast moving as is the climate change agenda. It is therefore important that this position statement is reviewed on a regular basis. Minor reviews to this position statement will be confirmed by the Chairman of the Joint Advisory Committee – significant changes will be confirmed by the Joint Advisory Committee.