

Babergh District Council

Renewable and Low Carbon Energy Position Statement

This statement sets out the Council's position on renewable and low carbon energy developments that are considered through planning applications determined by the Council, and those applications where the Council is a consultee, for example in the case of Nationally Significant Infrastructure Projects (NSIPs).

Further information on large scale energy and NSIPs in our Districts can be found [here](#).

Development plan policy is set out in Policy LP25 of the Babergh and Mid Suffolk Joint Local Plan Part 1 on Energy Sources, Storage and Distribution (see appendix). The Policy sets out the Council's position for the determination of planning applications for these types of development.

This position statement does not form part of the development plan but sets out the Council's strong preference relating to some aspects of renewable and low carbon energy development in our Districts, alongside the requirements of policy LP25.

This is not a definitive list of all material planning considerations relevant to such developments.

Climate Change

Babergh has a higher proportion of properties that use oil as a single source of heating compared to elsewhere in Suffolk or England as a whole (19.6% vs 13.2% in Suffolk and 3.2% in England). Some wards in the District have over half of their households using oil for heating. This dependence means these residents are exposed to the volatility of world energy markets and shows the importance of supporting and encouraging the transition to clean forms of energy production, both at the household level and more broadly.

Babergh District Council declared a climate emergency in 2019 and developed a Carbon Reduction Management Plan with the objective of being carbon neutral by 2030. It is also a member of the Suffolk Climate Change Partnership (SCCP) whose vision is for Suffolk to be an exemplar in tackling climate change. Further information regarding climate change can be viewed on the Babergh and Mid Suffolk Council website.

National policy clearly sets out measures to reduce greenhouse gas emissions with policies that seek to encourage renewable energy developments where they are acceptable. Within the National Planning Policy Framework (NPPF), the National Policy Statement for Energy (EN-1), the Energy White Paper – Powering Net Zero Future (December 2020) and the Net Zero Strategy: Build Back Greener (2021) there is a strong commitment to promoting the development of renewable energy. One of the key policies of the Net Zero Strategy is for the UK to be powered entirely by clean electricity by 2035, with a key policy for the provision of more renewable energy including solar, wind, air, ground and water-source heat pumps, hydro, and other low-carbon and carbon-neutral forms of generation, as available. Whilst some of these policies relate to National Strategic Infrastructure Projects above 50MW, the direction of travel is a material consideration for planning applications that the Councils determine.

The contribution of such developments to national and legally binding objectives such as Net Zero will usually be given substantial weight in the assessment of public benefits.

Renewable and Low Carbon Energy development

There are many renewable and low carbon energy development projects coming forward in the District, providing sources of energy that are less harmful to the environment than fossil fuels. There are clearly wider environmental and social benefits of providing energy security but there are also challenges when considering these types of developments. Whilst there are other material planning considerations, this position statement focuses on the following issues:

- The loss of best and most versatile agricultural land;
- The potential harm to the diverse character of the landscape; and
- Concerns and fears being expressed by some of our communities about harmful impacts.

Agricultural Land

The production of food through agriculture is an intrinsic part of the identity of much of our District, with strong traditions of agricultural land use. It is recognised however that food production is a complex matter with food being both imported and exported, with no certainty that an agricultural field would be used to grow food for consumption in the UK. It should be noted that there are also other non-food products grown on our agricultural land including biofuels.

It is recognised that there is more higher-grade agricultural land in our District rather than lower Grade 4 and 5, and also that the total farmed agricultural land according to DEFRA is:

- Babergh 49,238ha

The Council places great importance on preserving productive agricultural land including land categorised under Grade 3b of Agricultural Land Classification. However, the position set out in the NPPF is clear in that only Grade 1, 2 and 3a fall into the Best and Most Versatile Agricultural Land Classification. There has been no significant change in national policy and weight cannot reasonably be placed on the loss of Grade 3b, 4 or 5 agricultural land in this regard.

However, the planning reforms published by the Department of Levelling Up, Housing and Communities (DLUHC) resulted in changes to the NPPF, specifically the introduction of footnote 62, which states, “Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development.” The Council strongly encourages any developer bringing forward renewable or low carbon energy developments to consider our position and avoid loss of productive agricultural land to such development.

The Council also strongly encourages installing solar panels and other forms of low-carbon or carbon-neutral energy production as appropriate on existing and new buildings, whilst recognising that this is largely directed by national Building Regulations and the Future Homes Standard.

Landscape value

The landscape in our District has an intrinsic landscape value, as well as a cultural and often heritage importance. The Council strongly recommends that these are given utmost consideration when selecting a site for renewable or low-carbon energy development, and when considering the design, siting and layout of any development within that site.

Our landscapes are of great importance and value to our residents, businesses, visitors and our tourism offer. Any harmful effects to the landscape character and visual receptors of these areas including cumulative impacts, should be carefully considered when determining planning applications.

It is recognised that landscape and heritage impacts will be considered alongside the benefits that developments of this type would deliver, along with any other relevant legislative or policy considerations required for the planning balance for any decision to be made. We will expect applicants to minimise any harmful effects to visual receptors (e.g. Public Rights of Way, open access land and other public viewpoints).

It is widely perceived that the character of rural villages could be seriously compromised if settlements are surrounded or dominated by fields of Solar PV panels. Such approaches would also create a visual monoculture which is likely to be harmful to landscape character.

We therefore expect renewable and low-carbon energy production projects to be designed at a scale appropriate to the immediate context in which they are located. This will usually mean that small- and medium-scale projects are more likely to be approved than large-scale ones. It should be noted that developments over 50MW in capacity qualify as National Strategic Infrastructure Projects and are outside local planning authority control.

Our Communities

We strongly recommend that applicants engage on these matters with local communities at the earliest possible stage of development. In doing so we would encourage developers to set out how such developments could provide benefits for local communities as well as the steps needed to address any concerns.

These could include financial and non-financial obligations secured through the planning process to make a development acceptable under the Town and Country Planning Act 1990 (such as planning conditions and Section 106 legal agreements) but also community benefits that can be secured through Section 111 agreements under the Local Government Act 1972.

Applicants are encouraged to engage with affected communities early in the process to see if there are any community aspirations for investment identified through Neighbourhood Plans, Parish Infrastructure Investment Plans or other Parish Plans. Schemes developed in collaboration with communities where existing Neighbourhood Plans express support for such projects should be given priority. Even in the absence of these, any priorities for our communities that could be funded through contributions under Section 111 agreements, such as providing subsidised energy for those communities most affected, should be considered.

Section 111 agreements can secure sums of money, which are typically administered by Councils and then allocated on to local community projects. Money can be secured provided it can demonstrate it will 'facilitate or is conducive or incidental to the discharge of any of their functions'.

Community and district energy schemes are also encouraged, brought forward in collaboration with our communities to provide clean energy. Benefits such as the provision of training and/or long-term employment for local residents will likely be weighed positively in the overall planning balance.

Further information can be found at [Green Suffolk](#).

In summary

This position statement notes the valuable contribution renewable and low-carbon energy sources make to national energy security and we will reflect on any Ministerial Statements or national policy guidance issued on such developments as and when released.

It is important that any proposals for renewable and low carbon energy development reflect on the concerns around agricultural land, landscape and community benefit, and address those matters explicitly in any submissions.

7 May 2024

Appendix

Babergh and Mid Suffolk Joint Local Plan Policy LP25

| LP25 | Energy Sources, Storage and Distribution |
|------|--|
| | <ol style="list-style-type: none">1. Renewable and low carbon, decentralised and community energy generating proposals will be supported subject to:<ol style="list-style-type: none">a. The impact on (but not limited to) landscape, highway safety, ecology, heritage, residential amenity, drainage, airfield safeguarding and the local community having been fully taken into consideration and where appropriate, effectively mitigated;b. Where renewable or low carbon energy designs are to be incorporated within a development, an integrated approach being taken, using technology that is suitable for the location and designed to maximise operational efficiency without comprising amenity;c. The impact of on and off-site power generation infrastructure¹ being acceptable, having regard to other policies in this Plan;d. The provision of mitigation, enhancement and compensation measures when necessary; ande. Approval of connection rights, and capacity in the UK power network, to be demonstrated as part of the planning application (where applicable).2. The relevant LPA will normally use conditions attached to planning consents for energy development schemes to ensure the site is restored when energy generation ceases or becomes non-functioning for a period of six months.3. Where proposals for renewable and low carbon energy impact on nature conservation sites², the Areas of Outstanding Natural Beauty, or the setting of heritage assets (including conservation areas), the applicant must be able to convincingly demonstrate that potential harm resultant from development can be effectively mitigated and that there are no alternative sites available within the District or for community initiatives within the area which it is intended to serve. This includes providing underground power lines and cabling. |

¹ Generation infrastructure includes over-head cables, cable runs, invertors, control buildings, security fencing and highway access points.

² Nature conservation sites include: SSSI, SAC, SPA, NNR, Ramsar Sites, and Local Nature Reserves.