Position Statement

Solar Farms and the High Weald National Landscape

This Position Statement supplements and supports the High Weald AONB Management Plan.

Summary

- **The High Weald AONB Management Plan recognises the global importance of addressing the climate crisis and meeting the UK's net zero GHE targets. The High Weald National Landscape Partnership supports maximising the benefits of renewable energy projects, while conserving the natural beauty of the National Landscape and avoiding adverse impacts.**
- **Sites within, or affecting the setting of the High Weald National Landscape (HWNL) are not considered suitable locations for commercial scale greenfield ground-mounted solar farms;**
  - **they represent significant and uncharacteristic incursions into the rural area,**
  - **they would have a heavily industrialising and urbanising impact on the small-scale medieval landscape, which is so distinctive of the High Weald,**
  - **as such, they would fail to conserve or enhance the landscape and scenic beauty of the designated National Landscape.**
- **Providing a responsible and meaningful contribution to meeting national net zero targets with solar photovoltaic generation does not have to mean relying on ground-mounted solar farms. Alternative solutions to delivering renewable energy, in particular commercial-scale rooftop solar, should be prioritised at a national, regional and local level, to prevent harm to the natural beauty of the HWNL, whilst still delivering a decarbonised energy system.**
- **This approach is considered to align with national planning policy and guidance set out in the National Planning Policy Framework (NPPF), the NPPG and National Planning Statements (NPS).**

Introduction - The High Weald National Landscape

Considered one of the best surviving coherent medieval landscapes in north-west Europe, the High Weald has remained a unique and recognisable area for at least the last 700 years. An outstandingly beautiful landscape cherished by people and celebrated for its scenery, tranquillity and wildlife, its ridges and valleys are clothed with an intricate mosaic of small fields interspersed with farmsteads and surrounded by hedges and abundant ancient woods, all arranged around a network of historic routeways.

A nationally important, iconic landscape, it was designated an Area of Outstanding Natural Beauty (AONB) in 1983 and is now known as the High Weald National Landscape (HWNL).

Further detail on the special character of the High Weald is set out in the High Weald AONB Management Plan 2024-2029 . The Management Plan is a statutory document, which has been adopted by all the Local Authorities within the HWNL and which formulates their policy for the management of the area and for the carrying out of their functions in relation to it, in accordance with the CRoW Act.

The HWNL Unit recommends that the content of this Position Statement be used by Local Planning Authorities in developing planning policies regarding solar farms, and in determining planning applications, within or affecting the setting of the High Weald National Landscape.

Climate Change and the High Weald National Landscape

The climate crisis is a key cross-cutting theme in the High Weald AONB Management Plan, which recognises the global importance of tackling the climate crisis and meeting the UK's net zero greenhouse emissions (GHE) targets. However, it is important to recognise that not all solutions need to be delivered within protected landscapes, and particularly not when those solutions come at the expense of other features that it is important to conserve and enhance. This is particularly relevant when it comes to the larger scale renewable energy developments. National Landscapes are better placed and more able to contribute to addressing climate change causes and effects in other ways, that do not compromise other important aspects.

The Management Plan describes a holistic strategy for how the High Weald National Landscape can address climate change; it sets out that, as a nationally protected landscape, the area's priority for climate change mitigation is based on local creative solutions along with new collaborative partnerships within the NL and connecting to adjacent areas, in particular to promote nature-based solutions which simultaneously work to mitigate aspects of the climate and biodiversity crisis, cool the local environment and restore naturally functioning systems.

The Management Plan is the principal vehicle for ensuring that the statutory purposes of the HWNL are met, and is a material consideration in the planning process. It describes the High Weald's natural beauty by eight key components of character, with a series of Objectives and Actions for each.

Management Plan Objectives

Solar energy can make a valuable contribution towards carbon reduction targets, and towards Management Plan Objective G3 "*To pursue net zero across the High Weald without compromising its characteristic landscape beauty*". However, this should not be at the expense of other harms to the AONB; all proposals need to conserve and enhance the AONB and need to be considered against *all* objectives in the AONB Management Plan not just those related to climate. Objective G3 is underpinned by the following rationale: *To ensure that transformative mitigation and adaption policies are tailored to the High Weald's defining landscape character.*

Other Objectives in the Management Plan particularly relevant to the consideration of solar farms on fields in the High Weald include;

- **Fieldscapes and Heath** is one of the eight defining components of the natural beauty of the High Weald AONB set out in the Management Plan, and Objective FH2 is underpinned by the following rational: '*To maintain fields and field boundaries that form a part of the habitat mosaic of the High Weald; and to maintain this key component of what is a rare UK survival of an essentially Medieval landscape.'*
- **Aesthetic & Perceptual Qualities** is a further defining component of natural beauty, and Objective PQ2 seeks '*To protect the unspoilt rural landscape with its intrinsic sense of naturalness, valued views, and the extent of green space which foster experiences of rurality and tranquillity.'*

The Management Plan sets out that renewable energy systems in the High Weald NL can be best accommodated into this small-scale landscape through smaller scale and domestic projects, and advocates prioritising solar panels on roofs of existing development, particularly on the larger roofscapes of modern commercial and agricultural buildings, rather than solar fields (i.e. ground mounted solar arrays).

This position statement expands that principle, and builds on the detailed analysis of the High Weald NL's natural beauty set out the Management Plan, to set a specific position regarding commercial-scale solar farms on greenfield sites in, and affecting the setting of, the HWNL.

National legislative & policy basis for considering Solar Farms in National Landscapes

Legislation

National Landscapes (AONBs)[1] are designated by the Government to ensure that the special qualities of our finest landscapes are conserved and enhanced.

- Section 82 of The Countryside and Rights of Way Act (CRoW) 2000, confirms the primary purpose of AONB designation is to conserve and enhance the natural beauty of the area.

- Section 85 of the CRoW Act places a statutory duty on all relevant authorities requiring them, in exercising or performing any function that affects AONBs in England, to "**seek to further the purpose of conserving and enhancing the natural beauty of the Area of Outstanding Natural Beauty**"[2]

  In relation to the S.85 duty, Defra has published Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes - GOV.UK The National Landscapes Association has published a Briefing Note CRoW-s.85-duty-guidance-for-LPAs_NLA-Briefing-Nov-24.pdf to provide practical, easy-to-follow guidance on meeting the strengthened S.85 duty tailored specifically to plan-making and decision-making in Local Planning Authority functions.

  Conserving and enhancing the natural beauty of the High Weald National Landscape will normally mean avoiding harm, and conserving and enhancing the character components identified in the AONB Management Plan; supporting the Management Plan Objectives as set out for each of these; and following any Management Plan Actions set out for each.

National Planning Policy Framework (NPPF)

Paragraph 189 of the NPPF sets out that:

> "*Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues"* and that *"The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas".*

Paragraph 190 sets out that permission should be refused for major development in AONBs other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.

National policy guidance is also supportive of a more restrictive approach to solar farms on greenfield sites in protected landscapes:

National Planning Policy Guidance (NPPG)

Regarding renewable energy, the accompanying National Planning Practice Guidance (NPPG)[3] importantly clarifies that:

> '*The National Planning Policy Framework explains that all communities have a responsibility to help increase the use and supply of green energy,* ***but this does not mean that the need for renewable energy automatically overrides environmental protections'*** (Paragraph: 003 Reference ID: 5-003-20140306).

[1] *From November 22nd 2023, all AONBs are known as National Landscapes. The statutory designation remains an Area of Outstanding Natural Beauty (AONB) and is referred to as such in policy and legislation.*
[2] Countryside and Rights of Way Act 2000 (legislation.gov.uk)
[3] Renewable and low carbon energy - GOV.UK (www.gov.uk)

The NPPG further sets out that, in identifying suitable areas for renewable energy, local planning authorities will need to ensure they take into account '*critically, the potential impacts on the local environment, including from cumulative impacts*' (Paragraph: 005 Reference ID: 5-005-20150618), and that, in shaping local criteria for inclusion in Local Plans and considering planning applications, it is important to be clear that:

> '*the need for renewable or low carbon energy does not automatically override environmental protections*'

and that

> '*proposals in National Parks and Areas of Outstanding Natural Beauty, and in areas close to them where there could be an adverse impact on the protected area, will need careful consideration'*. (Paragraph: 007 Reference ID: 5-007-20140306)

With specific regard to large scale ground-mounted solar photovoltaic farms, the NPPG further recognises:

> '*The deployment of large-scale solar farms can have a negative impact on the rural environment, particularly in undulating landscapes'* and that LPAs should encourage '*the effective use of land by focussing large scale solar farms on previously developed and non agricultural land'*. (Paragraph: 013 Reference ID: 5-013-20150327)

National Planning Statements (NPS)

National Planning Statements apply to the consideration of 'Nationally Significant Infrastructure Projects' (NSIPs) under the Planning Act 2008. Solar farms with a generating capacity over 50 MW are considered NSIPs[4], which are determined by the Secretary of State rather than the LPA. Overarching National Policy Statement for Energy (EN-1)[5] sets out (*inter alia*) that:

> '*National Parks, the Broads and AONBs have been confirmed by the government as having the highest status of protection in relation to landscape and natural beauty. Each of these designated areas has specific statutory purposes which help ensure their continued protection and which the Secretary of State should have regard to in their decisions.*' (Para 5.10.7)
>
> *'The duty to seek to further the purposes of nationally designated landscapes[6] also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. In these locations, projects should be designed sensitively given the various siting, operational, and other relevant constraints.'* (Para 5.10.8)
>
> *'When considering applications for development within National Parks, the Broads and AONBs the conservation and enhancement of the natural beauty should be given substantial weight by the Secretary of State in deciding on applications for development consent in these areas. The Secretary of State may grant development consent in these areas in exceptional circumstances…*' (Para 5.10.32)
>
> '*For development proposals located within designated landscapes the Secretary of State should be satisfied that measures which seek to further purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development….'* (Para 5.10.33)

Para 4.7.2 of EN-1 acknowledges that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area.

The National Policy Statement for Renewable Energy Infrastructure (EN-3) adds further detail regarding assessing impacts of proposals.

[4] The Town and Country Planning (Development Management Procedure) (England) Order 2015
[5] EN-1 Overarching National Policy Statement for Energy (publishing.service.gov.uk)
[6] Countryside and Rights of Way Act 2000 (legislation.gov.uk)

Solar Farms and the High Weald National Landscape - The issues

Major Development

Commercial scale solar farm proposals (also known as ground-mounted solar arrays) on greenfield sites in the High Weald NL should usually be considered to constitute 'major development' in the context of paragraph 190 of the NPPF; as a result of the potential for both the scale and the nature of the applications to have a significant adverse impact on the natural beauty for which the area has been designated as an AONB. This is due to the large areas of ground-mounted photovoltaic cells laid out over a large area of countryside, along with associated infrastructure; usually comprising access tracks, perimeter deer/security fencing, lighting, and ancillary structures such as battery storage and substations.

As such, in accordance with paragraph 190, permission should be refused (unless there are exceptional circumstances **and** the development was in the public interest) – in this regard, it should be noted that exceptional *need* does not necessarily equate to exceptional *circumstances*.[7] For example, there may be other, more suitable ways of mitigating the impacts of climate change (or delivering renewable energy) or less harmful locations for the proposed development.

Where proposals constitute 'critical national priority' (CNP) nationally significant low carbon infrastructure – that is solar farms with a generating capacity above 50 megawatts (MW)[8], for which applications are made under the Nationally Significant Infrastructure Projects (NSIP) regime - National Planning Statement EN-3 sets out that the Secretary of State will take as the starting point that the relevant tests regarding exceptional circumstances and public benefit have been met.

However, that starting point does not apply to non-NSIP proposals of less than 50 MW, where the test of NPPF 190 should still apply; Government Briefing confirms that LPAs are responsible for determining planning applications for solar farms with a generating capacity under 50 MW, and that they will decide applications in line with their local plan unless 'material considerations' indicate otherwise[9](material considerations include the NPPF, NPPG and the AONB Management Plan).

General Considerations

Notwithstanding the above considerations of 'major development', solar farms on greenfield sites present a number of additional issues for the HWNL, with adverse impacts on natural beauty including landscape character, the agricultural economy, and wildlife and biodiversity. These specific impacts are all expanded in more detail below.

Such proposals will not usually be considered to accord with para 189 of the NPPF, which requires that great weight be given to conserving and enhancing landscape and scenic beauty in National Landscapes, and as such, the application of policy 189 will provide a strong reason for refusing the development under the provisions of para 11 of the NPPF.

Impacts on landscape character

Utilitarian in appearance and industrial in character, commercial scale solar farms on greenfield sites represent a significant introduction of built development into undeveloped open fieldscapes. They represent significant and uncharacteristic incursions into the rural landscape, having a heavily urbanising impact on the small-scale medieval landscape which is so distinctive of the High Weald with its intrinsic sense of naturalness and rurality. As such, the developments would not conserve or enhance the landscape and scenic beauty of the High Weald NL, and would be contrary to Objectives FH2 and PQ2 of the High Weald AONB Management Plan.

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[7] This principle is recognised in relevant case law (R (Mevagissey Parish Council) v Cornwall Council [2013] EHWC 3684 (Admin) (link), paragraph 52): 'Even if there were an exceptional need … that would not necessarily equate to exceptional circumstances for a particular development, because there may be alternative sites that are more suitable because development there would result in less harm to the AONB landscape'.

[8] Threshold to be increased to 100MW by end of 2025 via legislation to be introduced in spring 2025 Government response to the proposed reforms to the National Planning Policy Framework and other changes to the planning system consultation - GOV.UK

[9] House of Commons Library, 'Planning for Solar Farms' Research Briefing, May 2024

While the solar array development would usually take place within the framework of the historic field boundaries, nevertheless the quantum and disposition of development in such schemes; the near wholesale infilling of fields with solar panel structures, along with the associated infrastructure (access tracks, perimeter deer/security fencing, lighting, and ancillary structures such as battery storage and substations) would urbanise and significantly undermine the character and natural beauty of the High Weald NL.

Landscape and Visual Impact Assessments (LVIAs) often erroneously focus solely on *views* of a proposed solar farm, however the fact that a site might not be widely visible in longer landscape views, or that adverse impacts are 'only' experienced at a 'local level', should not be considered reasons for development, and does not diminish the potential for adverse impacts of the development on the full range of components of natural beauty of the High Weald NL set out in the Management Plan. It is not only views, but also the intrinsic character of the landscape that forms part of its natural beauty, as set out in the AONB Management Plan, and which must also be considered, within the context of Section 85 of the CRoW Act and para 189 of the NPPF.

The extent to which a proposed renewable energy development might affect the landscape and scenic beauty of the High Weald NL is a key consideration. However, natural beauty is a holistic concept; it is not just the look of the landscape, but includes landform and geology, plants and animals, landscape features, and the rich history of human settlement over the centuries.'[10] i.e. it includes landscape and scenic impacts, and also impacts on the natural heritage (such as landform, geology, species or habitats), tranquillity and dark skies, and cultural heritage (including the historic built environment), as described by the eight character components of High Weald natural beauty set out in the Management Plan.

Setting of the High Weald National Landscape

Additionally, solar farm development **in the setting of the High Weald NL** has the potential to adversely affect the natural beauty of the NL, not only on views to and from the NL and perceptual qualities, but also on dark skies and on interconnected habitats within and outside the boundary that have a functional relationship.

National planning policy guidance recognises that land within the setting of National Landscapes often makes an important contribution to maintaining their natural beauty, especially where the landscape character of land within and adjoining the designated area is complementary, and where poorly located or designed development can do significant harm.[11]

Impacts on farming capacity and the agricultural economy

Land-based Economy & Rural Life is a key character component of natural beauty in the High Weald. The area is characterised by a broad-based economy but with a significant land-based sector and related community life. Management Plan Objective LBE1 "*seeks to improve returns from, and thereby increase entry and retention in, farming, forestry, horticulture, and other land management activities that conserve and enhance natural beauty*."

However, the Plan clarifies that the pursuance of the above objective should not harm the other character components or be at the expense of their contribution to the natural beauty of the High Weald NL.

Whilst solar array development is often promoted as farm diversification and an income source for farmers and landowners, there are alternative means of supporting the agricultural economy through sustainable farming grants such as Defra's agri-environment schemes.

[10] Areas of Outstanding Natural Beauty: A guide for AONB Partnership members, Countryside Commission, CA24, Nov 2001

[11] NPPG paragraph: 042 Reference ID: 8-042-20190721

Best & Most Valuable Land

Within the context of 'Conserving & Enhancing the Natural Environment', the NPPF sets out that:

> "*planning policies and decisions should contribute to and enhance the natural and local environment by* [inter alia]*:*
>
> *a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
>
> *b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;"* (para 187)

While para 188 sets out that "*Plans should…allocate land with the least environmental or amenity value, where consistent with other policies in this Framework*…." and footnote 65 clarifies that "*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*"[12].

The NPPG clarifies Natural England's Agricultural Land Classification system, that there are five grades of agricultural land, (with Grade 3 subdivided into 3a and 3b), with grades 1-3a considered the 'best and most versatile land'.[13]

The NPPG further sets out, with specific regard to renewable energy, that:

> *"where a proposal involves greenfield land, whether (i) the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land."* (Paragraph: 013 Reference ID: 5-013-20150327)

Within the context of the agricultural economy of the High Weald, land graded 3b, whilst it may not be classified as 'best and most versatile land', nevertheless should not be considered poorer quality; Natural England's guidance describes 'Subgrade 3b – moderate quality agricultural land' as land capable of producing '*high yields of grass which can be grazed or harvested over most of the year*'[14] (inter alia). This definition is critical, reflecting the predominant pasture grazing agricultural character and tradition of the High Weald AONB and the significant value of grade 3b land to the landscape and rural economy. In addition, 3b grassland can be ecologically important and wildlife rich. As such, the Management Plan Fieldscapes & Heath Action (i) sets out that public bodies should:

> '*Recognise in decision-making the food productivity value and quality of grade 3a and 3b soils as being of greater importance to the High Weald's pastoral agriculture economy and landscape character than simply the ALC grade*.'

The agricultural grade of the land in the High Weald NL is therefore not considered to justify development of solar farms, when cumulatively taken into consideration are: the Management Plan Objectives and Actions, the NPPF qualification of development on agricultural land being 'demonstrated to be necessary', the fact that not all renewable energy solutions need to be delivered within protected landscapes, and the alternative options for solar photovoltaic energy generation within and outside the NL described in the following pages.

Impacts on wildlife and biodiversity

Applications for greenfield solar arrays may include proposals for biodiversity mitigation and 'improvements' such as changing land management, habitat restoration and habitat creation. Whilst such work may be laudable in itself, such mitigation measures should not be achieved at the expense of the natural beauty of the High Weald NL, and in themselves in no way compensate or excuse any ecological harms arising from the proposal itself, nor do they excuse wider harms to the natural beauty of the AONB and its landscape and scenic character.

[12] Para 181, footnote 62

[13] Paragraph: 001 Reference ID: 8-001-20190721

[14] Guide to assessing development proposals on agricultural land - GOV.UK (www.gov.uk)

Moreover, habitat enhancement and improved land management is not predicated on, or contingent on, development proposals of solar arrays; especially where other mechanisms such as agri-environmental schemes deliver specifically for habitat creation and management. (The HWNL team can provide advice to landowners and farmers on such schemes.)

The Biodiversity Net Gain Metric is now mandatory and applies to solar farm proposals as for other development. Whilst many schemes propose large on-paper biodiversity gains, in reality this is often limited to fragmented habitats e.g. narrow strips around the perimeter of solar sites, between existing hedgerows and proposed deer fencing of solar arrays. Such fragments would be difficult to maintain amongst the infrastructure of the solar farms, and their meaningfulness and their genuine contribution to improving local biodiversity is therefore questionable.

Evidence suggests that foraging bats are significantly impacted by the introduction of solar arrays on fields previously used within their forage areas, or where bats used hedgerows at the edge of fields for navigation[15], as well as reducing the area available for foraging. This is considered to be particularly relevant to the High Weald context, due to the mosaic character of the landscape of small, irregular shaped fields bound by woodland, shaws and hedgerows. The erection of 2m tall deer/security fencing is also likely to hinder continued use of fields and hedges as routeways and forage areas by bats active in the area. There is evidence of bat collisions with solar panels or mistaking the panels for water bodies and trying to drink from them[16]. Additionally, Natural England report that there are potential risks to birds from disturbance and displacement as solar farms create barriers and habitat loss[17]. For example, skylarks, a ground nesting bird much in decline and a red listed species, are displaced from open fields by solar panel structures; they do not nest near tall structures as these can obscure lines of sight to see predators.

Alternative solutions

Providing a responsible and meaningful contribution to meeting national net zero targets with solar photovoltaic generation does not necessarily mean relying on ground-mounted solar farms. There are a number of alternative solutions for solar photovoltaic energy generation:

Rooftop Solar

Currently only 5.5% of large-scale solar systems (that have a capacity of at least 1 MW) in the UK are installed on rooftops[18] and the Building Research Establishment cites that this is in marked contrast to many other European countries, and that for example in Germany in 2016 more than half of solar PV deployment was on commercial roofs.[19] However, a major new report based on research by University College London's Energy Institute for CPRE[20] has found that over half the solar panels needed to hit national net zero targets could be fitted on rooftops of existing buildings, especially industrial and commercial properties such as supermarkets, warehouses, distribution centres and in car parks[21], generating electricity at large capacity that feeds into the National Grid.

This research demonstrates that decarbonising the national energy grid in this way would require far less land than relying solely on large ground-mounted solar farms in the countryside. The key finding of the research is that installing solar panels on existing rooftops and other land such as car parks could provide at least 40GW in England by 2035, over 50% of the national target of 70GW of solar energy generation by 2035.

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[15] Tinsley E et al (2022), ground-mounted solar photovoltaic sites on bat activity, Journal of Applied Ecology 60, 1752-1762.

[16] (NE TIN 101). Natural England. (2011) Technical Information Note TIN101, Solar parks: maximising environmental benefits [archived].

[17] NEER012 Edition 1 Evidence review of the impact of solar farms on birds, bats and general ecology 2016

[18] House of Commons Library, 'Planning for Solar Farms' Research Briefing, May 2024

[19] BRE (2016) Solar PV on commercial buildings: a guide for owners and developers, (K. Arora, S. Diu, J. Roper and G. Hartnell) 123160-NSC-Solar-Roofs-Good-Practice-Guide-WEB.pdf

[20] Rooftop-Revolution-Report.pdf (cpre.org.uk)

[21] CPRE cite the fact that the government estimates there are 250,000 hectares of south-facing, commercial roof space across the country.

Professor Mark Barrett of the UCL Energy Institute, lead author of the research, said:

> 'This study found there is more than sufficient potential solar capacity on rooftops and car parks in urban areas. It's clear we can get close to meeting the government's solar energy target without necessitating the development of large solar farms in sensitive rural areas. Urban photovoltaic panels on car parks, and new and large buildings, would be relatively cheap although retrofitting solar panels onto existing homes would be more costly.'[22]

This approach to large-scale rooftop solar aligns well with existing policy that seeks to protect valuable landscapes, in particular for the High Weald NL, where the finite land resource can be better used for delivering a wider range of public goods and services such as the enjoyment of its landscape and scenic beauty, nature recovery, public amenity, and sustainable food production; all of which would conserve its inherent natural beauty.

This approach also aligns with government commitments to seek the widespread deployment of rooftop solar on commercial and industrial properties[23][24].

The High Weald NL Unit therefore supports roof-first planning policies that prioritise opportunities for generating solar energy for the National Grid from areas that are already built on, including rooftops, both through installations on existing structures, and through policies requiring such infrastructure to be included on new buildings.

Example Case Study [25]

Case study 1: Solar PV - Bentley Motors – UK's Largest Rooftop Array

The Bentley Factory in Crewe built in the 1940s is ideally situated to generate solar power as the "saw tooth" factory roofs are south facing at an angle of 20 degrees. It is the UK's largest rooftop solar PV array, owned and operated by solar power generator, Lightsource Renewable Energy and installed by main contractor Solarcentury.

Over 20,000 solar PV panels have been installed generating enough electricity adequate to power over 1,200 households covering 3.45 hectares of roof space which would otherwise be un-utilised. Lightsource Renewable Energy entered into a power purchase agreement with Bentley Motors, making it possible for the electricity generated during working hours to be used directly by the factory and for the electricity generated at weekends and times of low demand, to be fed back into the National Grid. At peak generation times, the system will produce up to 40% of Bentley's energy requirements.

The installation on Bentley's factory demonstrates the potential for solar energy to be generated on commercial roof-tops in the UK and is a clear example of how businesses can gain greater pricing certainty for the future whilst reducing their carbon footprint. With the build only taking 16 weeks, it shows the speed at which installations of this size can be completed even when constructed in tandem with existing business activity.

[22] Rooftops can provide over half our solar energy targets, report shows - CPRE

[23] House of Commons Library, 'Planning for Solar Farms' Research Briefing, May 2024

[24] Powering Up Britain - Joint Overview

[25] Microsoft Word - UK Solar PV Strategy Part 1 Roadmap to a Brighter Future 08.10.13 (publishing.service.gov.uk)

Small scale solar installations, Microgeneration and Local solutions

The HWNL Unit supports in principle solar and photovoltaic (PV) provision at a local microgeneration scale, that is small-scale generation of renewable energy by households for domestic use, and small businesses such as farms, for their own use.

Small-scale freestanding ground-mounted solar arrays (i.e. up to 0.05ha (500sqm)/50kw) to serve individual buildings, such as schools, hotels, community buildings such as village halls, and agricultural properties etc., alongside domestic use, may be acceptable in the High Weald NL, as their lesser ground coverage is often more able to be accommodated into the small-scale landscape without industrialising its character or scenic natural beauty.

The suitability of such small-scale installations on a case-by-case basis will depend on the consideration of a number of site and context specific factors, such as the topography and landscape character of the site, the presence of protected habitats and ecology, the ability for the array to be well screened within existing building complexes or by other landscape features such as hedgerows, walls or trees, and do not detract from any architectural or historic interest.

As with any development proposal, regard should be had to the Objectives and Actions of the High Weald Management Plan. Where new screening is proposed, care would need to be taken to ensure that the screening itself did not adversely affect wider views or landscape character.

With regard to zero carbon and the historic environment, Planning Principle 5 of the AONB Management Plan sets out that decision-making affecting the historic built environment should follow best practice advice from Historic England, in order that energy conservation measures are balanced with conserving the historic environment that contributes to the natural beauty of the AONB. With regard to microgeneration specifically, extensive guidance is available via Low and Zero Carbon Technologies in Historic Properties | Historic England

Sources used in the preparation of this Position Statement

High Weald AONB Management Plan 2024-2029

National Planning Policy Framework

Natural environment - GOV.UK (NPPG)

Renewable and low carbon energy - GOV.UK (NPPG)

Government response to the proposed reforms to the National Planning Policy Framework and other changes to the planning system consultation - GOV.UK

UK Solar PV Strategy Part 1 Roadmap to a Brighter Future 08.10.13 (Department for Energy & Climate Change)

House of Commons Library, 'Planning for Solar Farms' Research Briefing, May 2024

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