



To: Department for Levelling Up, Housing and Communities

CC: Department for Energy Security and Net Zero

7 April 2024

Dear Minister,

We are writing to you to raise our concerns about the effectiveness of the new provisions in the National Planning Policy Framework regarding new onshore wind projects in England, which were updated in September 2023.

As we have previously [set out in detail](#), we believe that continuing to have a separate and more restrictive planning policy which singles out onshore wind for conditions which do not apply to any other types of project is unnecessary, counterproductive, misaligned with the UK's climate policies and a serious barrier to the increased clean, cheap and secure energy supply which the UK urgently needs.

Our concerns around the new drafting include the following:

- While it is vital that environmental and biodiversity impacts are properly addressed in light of the nature and climate crisis, the requirement for planning impacts to be "appropriately addressed" is not sufficiently clear and therefore may be unworkable in practice, particularly if concerns are solely visual and therefore subjective.
- The requirement for the proposal to have "community support" is also unclear in terms of how this can be demonstrated and what would be viewed as a satisfactory level of support, and therefore may pose an unachievable barrier to projects coming forward, even if they do have community support or are community-led.

- The alternative forms of development orders which are permitted in addition to local plans are not necessarily suitable or accessible for new onshore wind projects.

While we appreciate that with this redrafting the government intended to lift the effective ban on new wind in England that has been in place from 2015, we remain concerned that in practice the new wording will simply not provide enough clarity or encouragement for sufficient – if any – new projects to even reach the planning stage.

This concern is backed up by the available evidence – as of February 2024, there were [no applications](#) for new onshore wind projects in England following the changing of the wording of the restrictions in the NPPF. We note that this ongoing block also seems incompatible with the government’s recent announcement on locational pricing and REMA, which intends to encourage new renewables to be built near demand.

Possible and Community Energy England also carried out an informal survey of community energy organisations in England in November, to get a sense of their view of the changes and whether the new wording would allow them to bring forward new onshore wind projects. Here are some of the key [findings](#) from that survey:

- Of the 16 community energy organisations which responded, when asked whether they thought these changes would be sufficient to allow new wind projects to come forwards, just one organisation answered “yes”, with nine responding “no” and six saying that they were unsure.
- When asked if, following these changes, they will consider trying to bring forward a new onshore wind project in England, just three out of the 16 organisations which responded answered “yes”, with seven responding “no” and the rest “maybe”.
- When asked if they understand what is required by the new planning requirements, only six out of the 16 organisations answered “yes”, with the rest responding “partly” or “no.”
- When asked which areas of the new guidance are unclear, areas of uncertainty include what is meant by community support, how to gather

evidence on this and the level of support required, the requirement for sites to be identified in local planning documents, and how to obtain the planning orders identified in the NPPF.

- One community energy organisation commented that “It’s clear to us that nothing has changed to improve the situation”, while another stated that these “reforms do nothing to encourage new wind turbines to be built.” Another cited an expert whose view was that no decent size onshore wind project would be built until these footnotes were simply removed, with the recent changes being only cosmetic.
- When asked if they were considering progressing one of the types of development order set out in the new NPPF, only one organisation responded “yes”.

This suggests to us that, among community energy organisations - which will be absolutely crucial actors to bring forward the locally-led projects with community support which the government rightly wishes to see - these changes simply are not sufficient to allow organisations to feel confident to bring forward new projects to the planning stage.

For capital intensive infrastructure projects where planning is a key risk, any ambiguity around the hurdles that must be cleared has a chilling effect on investment, so continuing to leave these rules vague and open to interpretation will kill investor appetite in new schemes.

We would also like to raise a potential concern about your Department’s response to the consultation on reform to national planning policy on onshore wind (available online [here](#)). We note that this response stated that there were between 900 and 1300 responses to these questions.

However, around 18,000 of Possible’s supporters responded to these consultation questions, and the Department previously [said](#) that there were 26,000 responses. Could you please clarify this, and confirm whether the Department took these responses into consideration in its response and, if not, explain why?

We remain concerned that, as the world faces the escalating impacts of the climate crisis, and households across the UK face continuing high energy bills

driven by the high and volatile cost of gas, the Department's planning regime for a vital source of clean, cheap domestic energy still unreasonably places disproportionate and unworkable restrictions on onshore wind, unfairly singles out wind for greater restrictions than every other type of energy project, including fossil fuel projects, and therefore locks the UK into higher emissions and higher energy bills.

We are therefore calling on you to take the sensible and proportionate step of simply removing those provisions in the NPPF which place higher burdens on approvals for new onshore wind projects in England than on other types of renewable energy.

We would also like to request a meeting with you to discuss our concerns. We look forward to receiving your response.

From the undersigned,

Possible

Community Energy England

Uplift

High Peak Green New Deal

Power for People

End Fuel Poverty Coalition

Friends of the Earth

Shareenergy

Greenpeace UK

York Community Energy

Regen

Fuel Poverty Action

Warm This Winter

RSPB