

Community Energy England response to the [MHCLG National Planning Policy Framework Consultation](#)

Introduction to Community Energy England

1. This is a response by Community Energy England (CEE), which represents more than 330 community energy and associated organisations across England involved in the delivery of community-based energy projects that range from the generation of renewable electricity and heat, to the energy efficiency retrofit of buildings, to helping households combat fuel poverty.
2. Our vision is of a thriving community energy sector integrated into and truly powering a fair, zero-carbon energy system.
3. Community energy refers to the delivery of community-led renewable energy, energy demand reduction and energy supply projects, whether wholly owned and/or controlled by communities or through partnership with commercial or public sector partners.

Questions on Proposed reforms to the National Planning Policy Framework and other changes to the planning system

2) Do you agree with the new format and structure of the draft Framework which comprises separate plan-making policies and national decision-making policies?

Strongly agree,

5) Do you agree with the proposed approach to simplifying the terminology in the Framework where weight is intended to be applied?

partly agree

18) Do you agree with policy PM13 on setting local standards, including the proposal to commence s.43 of the Deregulation Act 2015?

strongly disagree.

PM13, by removing the local authorities' ability to set standards, higher than national standards, runs counter to the planning system's purported ambition to 'contribute to radical reductions in greenhouse gas emissions'. It will prevent them taking action to meet their own Climate Action Plans (many with 2030 net zero goals - much more aligned with the science than the Climate Change Act 2050 goals and budgets). This is a denial of devolution, democracy, agency and all that is needed for a race to the top in climate action.

The IPCC said in 2023 that "The systemic change required to achieve rapid and deep emissions reductions and transformative adaptation to climate change is unprecedented in terms of scale, but not necessarily in terms of speed." The IPCC AR6 report said that "Local initiatives such as Transition Towns and community energy can lead to improvements in energy efficiency, ensure a decent standard of living and increase renewable energy uptake, while building on existing social trust, and in turn, building social trust and initiating engagement, capacity building, and social capital formation(Hicks and Ison 2018)." In many cases this applies to actions by the more effective local authorities. This will stifle their ability to lead the way.

In order to speed up change across a system, you need to empower early adopters, pioneers, trend setters, paradigm shifters among policy-makers; and those delivery partners and suppliers who want to speed up change (such as community energy energy) to work with them to prove and show what can be done better and faster.

Much of the best climate action in the country is being done by early adopter councils (most of them members of UK100) working with community energy organisations (all of them members of CEE)

I have read LETI's response to this question and I endorse it entirely.

36) Do you agree with the revised approach to the presumption in favour of sustainable development?

Strongly agree

The presumption in favour of 'sustainable development' is useful, despite the fact that it is weakly defined.

Recommendation

The purpose of planning should be strengthened to “attaining net zero as quickly as possible through sustainable development”. then it would be more effective and relevant to the climate crisis.

It should be strengthened by adding “Community ownership of developments and community involvement in planning should be a material consideration in favour of granting planning permission”

42) Do you agree with the approach to planning for climate change in policy CC1?

partly agree,

There are some useful practical measures introduced.

A nod is made towards the Sustainable Development Goals and moving towards a low-carbon economy. The three goals include ‘infrastructure that society needs’. (NPPF 16.) But this seems not to include viable natural systems, biodiversity and a stable climate as fundamental pre-requisites for a functioning society.

We agree that Development Plans “should take a proactive approach to mitigating climate change and supporting the transition to net zero”. If this is to be limited to the targets (‘provisions’) set in the Climate Change Act 2008 this will not be enough. PM13 must permit councils who want to lead the way to set and achieve higher standards than those set nationally (which should almost all be higher anyway).

CC1 goes as far as to say developments “*can help contribute to radical reductions in greenhouse gas emissions (which can be informed by an assessment of baseline carbon emissions and the potential effect of development options on future emissions and their mitigation)*” It is correct that ‘radical reductions’ in emissions are necessary - though there is no attempt in the planning system to relate emissions from the built environment to our emissions targets or carbon budgets. The use of ‘can’ implies that this is possible and nice to have - not that it **should be happening** across all developments and development types and that **quantification through accurate life-cycle emissions assessments must become part of the development process** and requiring that in planning is the key instrument (carrot and stick) by which this will happen.

The ‘radical reductions’ required by the science are in excess of what is mandated for in the Climate Change Act 2008 and is much more reflected in many councils’ Climate Emergency Plans which are aiming for net zero by 2030. As such the move to outlaw councils from setting standards that are higher than required nationally in PM13 runs counter to the

planning system's purported ambition to 'contribute to radical reductions in greenhouse gas emissions' in CC1.

43) Do you agree with the approach to mitigating climate change through planning decisions in policy CC2?

partly agree

The criteria set to ensure decisions also 'contribute to mitigating climate change' etc etc are welcome but weak. They start with location and transport planning - which can be a significant part of a building's operational in-use emissions. It is good to read that "substantial weight should be given to the benefits of increasing energy efficiency in existing buildings" and using low carbon sources of energy. Meanwhile the energy efficiency standards of new builds can be woeful.

Recommendation

There should be a stronger emphasis on embodied carbon and operational carbon of developments.

The NPPF should mandate developers to prove that their developments are as near to zero-carbon as possible and account for how they have met (or failed to meet) all of the recommendations in the Planning Guidance.

Rigorous assessments should be made of designs, allowances made for the average 'performance gap' between design and the constructed building, and rigorous measures identified to minimise that performance gap by good building practice, project management and monitoring and a clear and enforceable plan on how this will be evidenced to building control.

47) Do you have any other comments on actions that could be taken through national planning policy to address climate change?

Recommendation

Introduce a net zero mandate in planning

The Labour [Clean Energy Mission](#) [p8] promised to "add net zero mandates to all relevant regulators that need it, including in the planning system." It is a dereliction of responsibility that this, the second NPPF consultation by this government, has not introduced it.

The definition of the purpose of the planning (NPPF 14.) as to “contribute to the achievement of sustainable development” is still woefully inadequate, despite sections on climate change, and a mention of radical reduction in climate emissions. Sustainable development is defined by multiple clauses and footnotes so subject to very elastic interpretation. Our planning system should implement existing legal commitments to environmental protection and addressing climate change and require proportionate change in the built environment which contributes 40% of UK emissions (according to assessments by the Low Energy Transformation Initiative (LETI).)

Recommendation

The purpose of planning should be 'attaining net zero as quickly as possible through the process of sustainable development'. There should be mention of climate resilience and adaptation. Development can be genuinely carbon neutral and even carbon negative. Planning should be encouraging this by requiring full lifecycle analysis of embodied and operational carbon of developments and those which do not sufficiently contribute to attaining net zero should be refused.

96) Do you agree with the approach to planning for energy and water infrastructure in policy W1?

partly agree

Recommendation

LPAs should be encouraged to engage with local community energy organisations and large local energy users in preparing Local Energy Plans. 25% of councils have committed to Local Area Energy Plans as of June 2025. This engagement and planning process should ideally form the basis of any Local Energy Plan.

97) Do you agree with the amendments to current Framework policy on planning for renewable and low-carbon energy development and electricity network infrastructure in policy W2? *partly agree*

Recommendation

LPAs should identify areas suitable for heat networks especially where these are not covered by the Green Heat Network process. It should give substantial weight to proposals to co-locate renewable energy (especially community-owned) to provide cheap power to these heat projects.

98) Do you agree with the proposed approach to supporting development for renewable and low carbon development and electricity network infrastructure in policy W3?

partly agree.

We welcome that ‘substantial weight should be given... to the contribution that small-scale and community-led renewable and low carbon energy projects can make to reducing emissions, along with their associated economic and social benefits.’ This is an improvement on the previous NPPF which required only that LPAs “recognise the contribution”.

Recommendation

It should read, “small scale, community-led and community owned”. Given the government’s commitment to community shared ownership of commercial developments not all community energy projects will be ‘community-led’ but yet will mobilise significant community investment, participation and benefit. Benefits from these projects to the energy system and to consent to and participation in the energy system transformation should be explicitly referenced in W3 (c) viz. “...along with their associated economic, social, energy system and public engagement benefits.”

The government’s Local Power Plan is clear that “ownership matters” for increasing people’s commitment to and participation in the energy transformation to net zero, without which the Climate Change Committee is clear, “It will not be possible to get close to meeting a net-zero target”. (Net Zero Report p 193). This value of community energy is not sufficiently referenced in the NPPF.

Community energy has an interest, which the big developers merely supplying the national grid do not, in the village and community scale energy management and supply projects that can constructively match generation with local demand thereby ‘reducing pressure on the grid’ - a stated government aim of supporting local and community energy. These system benefits to the energy transition are also not referenced in the NPPF.

The government strongly encourages collaboration between local authorities and community energy in the Local Power Plan and are putting in place a Local Partnership Fund to support these collaborations with grant funding

Recommendation

Local authority/community energy collaborations be further strengthened in the NPPF. For example: “Local Planning Authorities should provide a positive strategy to encourage small scale and community-led energy projects”....or alternatively “support the development of small scale and community-led schemes through their policies and decisions”.

We welcome the specific recommendation of acceptance for projects “outside areas which have been identified as suitable” where they meet other planning criteria.

100) Do you agree with the proposed prohibition on identifying new coal sites in policy M1, and to the removal of coal from the list of minerals of national and local importance?

Strongly agree

105) Do you agree with the exclusion of development involving onshore oil and gas extraction from policy M3?

Strongly agree

109) Do you agree with the approach to coal, oil and gas in policy M5?

partly agree

Increase in coal, oil and gas extraction even in licenced areas runs counter to the science on what is needed to meet legally binding climate targets.

110) Are there any other exceptional circumstances in which coal extraction should be permitted?

No

130) 136) Do you agree policies GB6 and GB7 set out appropriate tests for considering development on Green Belt land?

partly agree

Large scale renewables cannot be accommodated in urban areas and finding suitable sites for medium scale is very challenging. The Government should allow “small scale and community-led/owned” renewable energy in the Green Belt. These should be added to the exceptions that are allowed on Green Belt land.

This change would make a major contribution to ensuring that the proposed grey belt housing developments could achieve the lowest possible carbon emissions by having community energy generation supplying them from the adjacent green belt. This could also significantly reduce heating emissions.

We note *GB8 1. (b) Necessary improvements to local or national infrastructure* but think that something more specific is required.

Recommendation

Add “Small scale and community-led/owned renewables and low carbon energy projects” to the list of exceptions to the Green Belt so they no longer constitute inappropriate development.

148) **Do you** agree policy DP3 clearly set out principles for development proposals to respond to their context and create well-designed places?

partly agree

DP3 c) is good but could be more specifically worded eg on building orientation it should specify “which maximises winter passive heat gain whilst protecting against overheating from heat gain in the warmer months.”

182) Do you agree the policy in Policy N4 provides a sufficiently clear basis for considering development proposals affecting protected landscapes and reflecting the statutory duties which apply to them?

partly agree,

Small-scale and community-led/owned renewable and low-carbon energy developments’ should be permitted in Protected Landscapes, especially where they support settlement and businesses in those landscapes.

N4. 4. Should be relaxed to enable the above developments in the settings and surrounds of those landscapes.

Protected landscape designations are stifling renewable deployment, particularly onshore wind. The review should also examine the landscape policies which have led to the refusal of some wind farms located outside National Parks and AONBs but still visible from within them. This approach is sterilizing large tracts of open land with good wind speeds.

Recommendation

Conduct a review of the policy relating to renewables, including those relating to renewable heat and onshore wind, inside and adjacent to sensitive landscape areas such as AONBs and National Parks.

187) Do you agree with the approach to plan-making for the historic environment, including the specific requirements for World Heritage Sites and Conservation Areas, set out in policies H1 – H3? *partly disagree*

Community Energy England’s membership includes many groups dedicated to energy saving and fuel poverty reduction. They are therefore keenly interested in measures that will contribute to both. A significant proportion of buildings in the UK are listed or in conservation areas. There is a strong need to enable retrofit and renewable energy measures and to develop sympathetic solutions for such buildings.

Recommendation

A change of policy at national level to relax restrictions on energy saving and micro-renewables in conservation areas which is restricting or stifling much needed improvements in hard to heat and insulate properties with little, or in some cases no, contribution to local heritage.

A presumption in favour of renewable energy installation on or near heritage assets should be put in place with clear guidelines.

191) Do you have any other comments on the revisions to the heritage chapter?

One of the greatest dangers to heritage assets will be from the impacts of climate change. Another may be from non-viability due to increasing energy costs or the impossibility of heating or cooling them. As such permitting renewable and low-carbon energy projects on or adjacent to them will have important impacts on their viability and should be enjoy a presumption in favour of being permitted.

Contacts

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Community Energy England

Community Energy England (CEE) was established in 2014 to provide a voice for the community energy sector, primarily in England. Membership totals more than 330 organisations. Many of the member organisations are community energy groups, but membership extends across a wide range of organisations that work with and support the community energy sector.

www.communityenergyengland.org