



13 February 2023

BY EMAIL ONLY

info@endfuelpoverty.org.uk

To: PlanningPolicyConsultation@levellingup.gov.uk

Re: Response on onshore wind to consultation on Levelling-up and Regeneration Bill reforms to national planning policy

The End Fuel Poverty Coalition is a broad group of over 70 anti-poverty, energy, environmental and health campaigners, local authorities, trade unions and consumer organisations and is also supported by academics and industry experts. For more information, visit <https://www.endfuelpoverty.org.uk/>

Please see below our response to Chapter 8 of the consultation on Levelling-up and Regeneration Bill reforms to national planning policy, specifically relating to onshore wind.

Our comments in support of changes to the policy should be read alongside our calls for reform of the energy market pricing arrangements which is being led by the new Department for Energy Security and Net Zero [through its Review](#). Currently, the energy market is underpinned by “marginal pricing” – meaning that the price per unit (kWh) of electricity is determined by the last energy source delivered onto the grid to meet demand in any given half hour period.

In practice, this is often the cost of gas power station produced electricity, not renewable energy. Yet, renewables make up the biggest proportion of the energy mix (38.7%, BEIS) and are [nine times cheaper](#) than gas-fired power stations. Therefore the [Coalition's response](#) to the REMA consultation urged the Government to unlink the cost of energy from gas

These reforms must operate alongside the planning reforms being consulted on which can also help harness the benefits of net zero, reduce risks of energy price volatility and deliver a secure supply to consumers.

We therefore support the government's proposal to remove the current virtual block on new onshore wind in England by updating the National Planning Policy Framework. However, we remain concerned that the restrictions which would remain in planning policy under the proposed redrafting are still far too heavy, and will fail to allow the expansion of clean energy we urgently need.

The government must ensure that the changes allow sufficient new onshore wind to come forwards to support the crucial goal of ending gas power generation as quickly as possible, and ending the high energy costs driven by gas prices which are causing so much misery.

The planning regime therefore should stop placing greater restrictions on new onshore wind, [which is clean and popular](#), than on new drilling or mining for oil, gas or coal, which are polluting, dangerous, unpopular and unneeded.

Instead, we would like to see new onshore wind treated in the same way as any other type of local planning application. This means **removing, rather than amending, the existing Footnote 54**, and ensuring that the new planning regulations pass the vital test of supporting and facilitating communities which want onshore wind.

Q.41: Do you agree with the changes proposed to Paragraph 155 of the existing National Planning Policy Framework?

We support ensuring that the NPPF facilitates repowering and encourages local authorities, developers and community energy groups to ensure that this happens. Repowering is clearly necessary, cost-effective and beneficial. While I agree that it is useful for local plans to address repowering and that local authorities should be encouraged to do this, this local plan process might not be done more often than every five years, and local authorities may not have the time, resources or expertise

to include repowering in their plans. Inclusion in a local plan therefore should not be a requirement without which repowering cannot go ahead. In addition, it is not clear what the requirement to address impacts "satisfactorily" will mean in practice, or how developers or community energy groups will demonstrate that they have met this.

Q.42: Do you agree with the changes proposed to Paragraph 158 of the existing National Planning Policy Framework?

The addition of the suggestion to approve in paragraph c) is a positive step. It is not clear what "acceptable" impacts would be in practice, or how it would be demonstrated that this bar has been cleared.

Q.43: Do you agree with the changes proposed to footnote 54 of the existing National Planning Policy Framework?

It is positive that the proposed footnotes 62 and 63 (slightly) lower the almost impassable bar for new onshore wind projects which were in the previous footnote 54. However, the redrafting still sets a higher bar for new onshore wind than for other types of energy development; still fails to provide clarity on how this bar can be cleared, and how communities or developers can show that it has been cleared; and still poses too great a barrier to the new wind power we urgently need. I am therefore concerned that this new wording would still fail to enable the growth of clean community energy that is needed, and would still block new wind projects that have local support, or prevent applications from coming forwards.

Do you have any views on specific wording for new footnote 62?

Our view is that onshore wind does not need a separate planning regime that places greater barriers on it than other types of project, and these restrictions should be removed by removing rather than amending the footnote. If the footnotes remain, clarity is badly needed about what is meant by "appropriately addressed" and "satisfactorily addressed" and the level of community support which is required, and how this can be demonstrated in practice.