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**May 2018**

**Re: National Planning Policy Framework (NPPF) consultation**

I write to respond to the National Planning Policy Framework (NPPF) consultation on behalf of 10:10 Climate Action and the following organisations: Baywind Energy Co-operative, Bioregional, Bristol Energy Network, Bulb Energy, Community Energy England, Co-op Energy, ENERCON GmbH-UK, Energy4All, The Energy Workshop, Emergya Wind Technologies (EWT) UK Ltd, Good Energy, Greenpeace UK, Hampshire Renewable Energy Co-op, Harbon Wind Turbines, High Winds Community Energy Society, Kingspan Environmental, Regen, Share Energy, Stephens Scown, Town and Country Planning Association (TCPA), Transition Eynsham Area (GreenTEA), Triodos Bank N.V., and Westmill Wind Farm Cooperative.

**Q32 Do you have any comments on the text of Chapter 14?**
We would like to make comments and recommendations with regard to footnote 40 in order to reduce its conflict with the spirit of Chapter 14, which seeks to increase renewable energy supply and 'contribute to radical reductions in greenhouse gas emissions', and to reduce its damaging impact on the onshore wind sector in England.

Footnote 40 copies the Written Ministerial Statement (WMS) on onshore wind, (HCWS42 - issued 18 June 2015), into the draft revised NPPF. The WMS has had a hugely damaging impact on both the commercial and community onshore wind sector in England. Our recent analysis shows that since June 2015, there has been a 94% decrease in the number of planning applications for onshore wind projects in England, representing a 92% drop in potential new installed capacity. There has been just one application for a community-led wind initiative, which is a single-turbine project.

Without additional funding, expertise and clarification for local authorities, the WMS requirements are all but impossible for planning officers to act upon, and for wind projects to meet. They also enable local authorities to make political decisions to implement local de facto bans on new onshore wind. When surveyed by the Centre for Sustainable Energy in 2016, more than 50% of local planning policy teams said they felt either 'unsure' or 'not confident' about how the 'community backing' condition should be understood. Over half of the respondents also indicated that their local authority had no work planned to develop or adapt their Local Plan in order to identify 'suitable' sites. Conversations with stakeholders have led us to believe that the vast majority of local authorities do not have areas identified as suitable for onshore wind in their Local Plans.

Given the impact of the WMS, the current wording of footnote 40 will consolidate the shutting-down of onshore wind in England. Along with solar, onshore wind represents the majority of potential renewable energy capacity in England, as well as being the cheapest new source of energy. The RSPB estimates that the UK has the potential to generate 140TWh/year of onshore wind power at sites where there is low ecological risk. 61% of this capacity is in England - enough to power 20 million homes. There is also significant public support for onshore wind, now at 76%. YouGov polling finds strong support for wind turbines within five miles of respondents' homes in all UK regions, highest in the south of England.

We therefore strongly believe that footnote 40 undermines the spirit of Chapter 14, particularly paragraphs 150 and 151 which ask local authorities to 'provide a positive strategy for [renewable] energy sources', and to 'support community-led initiatives for renewable and low carbon energy'. Given the significance of onshore wind for the future development of renewable energy in England, its low cost compared to other energy sources and its public popularity, local authorities will be significantly hindered in meeting the spirit of Chapter 14 if the barriers to further onshore wind deployment are retained in the NPPF. It is difficult to imagine a 'positive' or 'supportive' strategy for either commercial or community-led renewable energy projects if onshore wind is unable to be deployed.

**Mitigating the impact of footnote 40**

We understand the government's current position is that 'more large-scale onshore wind is not right for England'. We see two key ways to mitigate the conflict between footnote 40 and paragraphs 150 and 151 within the boundaries of this position.

1) Enable small-scale onshore wind

In its current form, footnote 40 not only restricts 'large-scale' onshore wind projects in England, but projects of all scales - including community-led, business self-supply, farmer-led and other small onsite projects. We define small-scale as projects up to 5MW, in line with the government's own threshold for small-scale renewables under the feed-in tariff regime. Enabling small-scale wind projects to proceed unprejudiced through the planning system would bring benefits to farmers and rural businesses, community energy groups, and business and industrial energy users.

When surveyed in 2016, the majority of planning officers in England said the WMS had made it harder for community groups to bring wind projects forward. Describing the impact of the WMS, the director of Hampshire Renewable Energy Cooperative - a group formed by communities in Winchester, Basingstoke and Andover to build a community-owned wind farm - has said:

> 'The sudden reversal of government policy on onshore wind effectively destroyed the hard work the whole community had put into getting our wind farm up and running. Thousands of local people were behind us and many were ready to invest in the wind farm for the good of the local community. Those hopes and dreams were dashed. There is still huge local support for a local community owned wind farm - if policy were reversed, the community still has the passion to re-start the project and deliver clean and cheap energy for the people of north Hampshire'.

Community-led onshore wind projects bring benefits to the local community via community benefit funds, investment returns, and opportunities for direct involvement in decarbonising our energy system. For example, Westmill Wind Farm Co-op in the south-east of England has 2260 members, and has used its profits to fund local initiatives - including supporting the village hall and local school.

Other small-scale projects can enable diversification of income, reduced energy bills and reduced exposure to energy cost risk for groups such as farmers and large energy consumers. National Farmer's Union (NFU) statistics show that wind turbines on agricultural land provide around £125 million annually in gross income to farming businesses, a figure they wish to see double. Nissan's EV manufacturing plant in Sunderland meets a significant proportion of its energy needs via ten wind turbines and a solar farm - enough to build the equivalent of 31,374 vehicles. Ecotricity's 800kW turbine now supplies Queen Elizabeth Hospital in King's Lynn with much of its annual electricity demand, significantly reducing bills.

2) Enable existing projects to repower

Footnote 40 will not only result in the prevention of 'more' onshore wind projects in England, but could lead to a net decrease in renewable capacity as existing projects struggle to secure planning permission to 'repower'. This directly contradicts paragraphs 147 and 150 of the

NPPF, which state that the planning system should 'contribute to radical reductions in greenhouse gas emissions' and help to 'increase the use and supply of renewable energy'.

According to analysis by the Energy and Climate Intelligence Unit (ECIU), repowering the 750 turbines across the UK that will reach the end of their service lives over the next five years would save more than £77 million per year compared to replacement with gas-fired power stations - reducing energy bills, carbon emissions and dependence on imported fossil fuels.

English communities would stand to gain £21 million from these repowered sites via community benefit funds - providing finance for local projects tackling issues such as fuel poverty, rural low-carbon transport and social inequality.

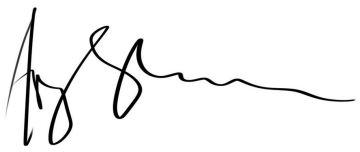
Repowering also usually leads to a reduction in turbine numbers, while increasing power output, due to increased turbine efficiency. Enabling these sites to repower would therefore provide an opportunity for more clean power to be generated by fewer turbines at existing wind sites, with which communities are already familiar.

**Recommendations**
In order to enable local authorities to implement the spirit of Chapter 14 by supporting renewable energy developments and community-led renewable initiatives, and maintaining existing onshore wind capacity in England, we make the two following recommendations:

1) Exempt onshore wind projects of up to 5MW from the additional requirements outlined in footnote 40 of the draft revised NPPF
2) Exempt wind projects seeking to repower existing wind power sites from the additional requirements outlined in footnote 40 of the draft revised NPPF

We suggest exempting these projects by amending footnote 40 of the NPPF so that it reads (changes in italics):

> A proposed wind energy development *of more than 5MW* should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan; and, following consultation, it can be demonstrated that the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing. *These two requirements do not apply where the proposal seeks to repower an existing wind farm or turbine.*



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