

# Regen response to National Planning Policy Framework Consultation

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## Summary and recommendations

Our response to this consultation is primarily focused on the policies which support the development of renewable energy generation and energy storage projects.

The volume of planning applications for renewable energy projects of all scales in England has more than trebled in the last decade and has risen notably in recent years. The volume of planning applications will need to continue to increase if we are to deliver our renewable energy and net zero ambitions. The interventions and policy reforms to unlock the grid connection queue in the UK could also drive an increase in planning applications; as such, there is an urgent need to address resourcing issues alongside planning policy changes.

As part of our response, we set out the following overarching recommendations:

- **Recommendation 1:** The planning system must prioritise action on climate, and this should be articulated through a definition of the purpose of planning in the NPPF that reflects the crucial role of planning in securing our future in a changing climate.
- **Recommendation 2:** We urge the government to provide consistency across planning regimes by designating all renewable energy projects as a Critical National Priority and affording them substantial weight in decision making.
- **Recommendation 3:** For any policy changes to have an impact, they must come alongside the increased resourcing and training of local planning authorities. As such, we are calling for the introduction of specialist renewable energy planners that can work across local authorities.
- **Recommendation 4:** There will be a need to ensure that the NPPF is aligned with the future Strategic Spatial Energy Plan (SSEP) and Regional Energy Spatial Plan (RESP).

## About Regen

Regen provides independent, evidence-led insight and advice in support of our mission to transform the UK's energy system for a net zero future. We focus on analysing the systemic challenges of decarbonising power, heat and transport. We know that a transformation of this scale will require engaging the whole of society in a just transition.

Regen is a membership organisation with over 200 members who share our mission, including clean energy developers, businesses, local authorities, community energy groups and research organisations across the energy sector. We manage the Electricity Storage Network (ESN) – the industry group and voice of the grid-scale electricity storage industry in GB.

# Supporting renewable deployment: strengthening the NPPF

## Question 72: Do you agree that large onshore wind projects should be reintegrated into the NSIP regime?

We welcome the new government's swift action in removing the planning barriers impacting onshore wind, alongside the establishment of the onshore wind industry task force. This is significant not only for advancing the UK's renewable energy goals, but also for the potential benefits it brings to communities across the country.

In principle, we support the reintegration of large-scale onshore wind projects into the Nationally Significant Infrastructure Project (NSIP) regime. The NSIP process often provides a clearer and more consistent framework for decision making. However, it is important to acknowledge that the NSIP regime comes with significantly higher costs and complexity, which can be a barrier for developers. As such, in response to question 75 below, we provide our thoughts on ensuring that the threshold is set at a suitable level.

Alongside reintegrating large onshore wind projects into the NSIP regime, addressing the challenges inherent in both the local and NSIP level planning regimes is critical. Getting both planning systems functioning well will ensure that developers are sizing their projects to be appropriate to the site conditions rather than to fit the size limits of a particular planning regime. Three challenges need to be addressed: NSIP reform, local authority resourcing and current local authority policies on wind.

### NSIP reform

The current NSIP regime, while effective in some respects, requires reform to accelerate decision-making processes for renewables. This could involve:

- Exploring methods to streamline the process, such as introducing a fast-track consent route specifically for renewable energy applications, which would reduce delays and improve efficiency or prioritising renewable energy within the recently introduced fast-track consent route.
- Refining the amendment process within the NSIP regime to allow for small project amendments without the need for lengthy procedures. This flexibility would better accommodate the dynamic nature of project development and reduce unnecessary costs and delays.

### Resourcing of local planning authorities

Another critical aspect that must be addressed is the challenge of resourcing at the local authority level. If we are to see the expected increase in renewable energy applications, this will put pressure on already stretched local planning authorities. As such, we suggest the introduction of new specialist renewable energy planners who can work across local authorities

(potentially located within net zero hubs) with the sole focus of consenting renewable energy applications. This dedicated expertise would help address resourcing constraints and ensure that renewable energy applications are processed more efficiently and effectively.

### **Impact of adopted local authority policies on wind**

As an immediate action, there is a need to address the potential unintended impact of local plan policies introduced as part of the previous NPPF requirements on onshore wind. Some adopted local plan policies ([collated in this report](#)) contain restrictive wording such as ‘*wind energy is not anticipated to be acceptable unless an area is identified in a Neighbourhood Plan*’ (Ashford Local Plan). Another example is local authorities who have allocated areas for onshore wind, but only allowing small turbines.

We suggest that the government issue a clear statement confirming that the revised NPPF and relevant National Policy Statements (NPS) should take precedence over policies on onshore wind policies in local plans. This would ensure that renewable energy projects are not unduly delayed or obstructed by outdated local policies, such as those stating that onshore wind is not suitable in their local area.

**In summary: while we support the reintegration of large onshore wind projects into the NSIP regime, it is imperative that the government undertakes meaningful reforms to both the NSIP and local planning processes.**

## **Question 73: Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?**

We have organised our answer to this question into the following sections:

- Amendments to existing paragraph 163 to direct decision makers to give significant weight to the benefits associated with renewable and low-carbon energy generation
- Further amendments to paragraph 160 seek to set a stronger expectation that authorities proactively identify sites for renewable and low-carbon development when producing plans
- The removal of existing paragraph 161 regarding support for community energy
- Underlying local authority resourcing issues.

**Amendments to existing paragraph 163 to direct decision makers to give significant weight to the benefits associated with renewable and low-carbon energy generation are positive but should go further.**

While we fully support the intention of the proposed changes to give greater support to renewable and low-carbon energy, we feel that the wording does not go far enough and is

unlikely to result in the desired impact. Instead, we strongly recommend that all renewables and energy storage projects are designated as a Critical National Priority (CNP).

Currently, all renewable energy projects that come under the NSIP regime benefit from the CNP designation. This status recognises that ‘the benefits to national security, the economy, commercial interests, and achieving net-zero targets are generally considered to outweigh any negative impacts’. By designating all renewable energy projects, regardless of the planning regime they fall under, as CNP, we would ensure a more uniform and supportive approach, removing inconsistencies. This would likely facilitate quicker approvals, reduce uncertainties, and ultimately accelerate the deployment of vital renewable energy infrastructure.

Additionally, the NPPF, NPPG and wider planning policy and guidance should provide clarity that substantial weight should be given to renewable and low carbon energy projects within the planning balance. To improve clarity, transparency, and consistency for local planning authorities and other stakeholders within the planning process, we recommend that the existing glossary of terms relating to weight in the planning balance from the NPS EN-1 are incorporated within the NPPF.

The NPPF should also be explicit in confirming that ‘renewable and low carbon energy’ involves Battery Energy Storage System (BESS) projects, which provide an important role in facilitating a renewables-based energy system and increasing energy security. This could be updated in the glossary of terms.

The NPPF, or planning guidance, should also offer clearer guidance on the acceptable magnitude of landscape and visual impacts, recognising that without renewables, climate change will create significant negative impacts on our landscapes. This should explicitly recognise that significant landscape and visual impacts are generally acceptable when these impacts are minimised through appropriate design and mitigation measures.

Additionally, in March 2024, the Department for Levelling Up, Housing and Communities published a consultation on an ‘accelerated planning system’. As we set out in [our response](#), while the need for an accelerated planning process is widely acknowledged, the proposed system does not adequately address the specific needs of renewable energy projects. To maximise the effectiveness of such a system, we suggest that any accelerated planning process should explicitly prioritise renewable energy projects and net-zero developments.

**In summary: while the proposed changes to the NPPF are a step in the right direction, we urge the government to go further by designating renewable energy projects as a Critical National Priority across all planning regimes.**

**Further amendments to paragraph 160 seek to set a stronger expectation that authorities proactively identify areas for renewable and low carbon development when producing plans. While aiming to have a positive impact, this may have unintended consequences.**

We acknowledge the amendment to Paragraph 160b (now 161b) of the NPPF to require Local Planning Authorities (LPAs) to "identify" suitable areas for renewable and low-carbon energy sources and supporting infrastructure, rather than "consider identifying" them. However, while the intention is to promote the development of renewable energy at a local level, we have significant concerns about the effectiveness of this approach, particularly in the context of the current resourcing issues faced by local authorities.

The process of selecting appropriate areas is highly technical and requires a deep understanding of various factors, including technical constraints such as wind speed, grid connection availability, land use constraints, environmental impact assessments, and commercial viability. Resource-stretched local authorities may lack the specialised expertise needed to make informed decisions about site selection. As a result, areas designated in local plans could be poorly suited for development, potentially leading to suboptimal outcomes for renewable energy deployment. This ad-hoc approach may also result in a challenging patchwork of local plans across the UK.

Under the current proposal, the fixed nature of these designated areas may present additional challenges, particularly in areas where local authorities are not very supportive of renewable development. Once boundaries are set within a local plan, they are difficult to amend without undergoing a formal review process. This rigidity does not account for the dynamic nature of renewable energy technologies, which continue to evolve rapidly. As new technologies emerge or existing ones are refined, the suitability of previously identified areas may change, yet the inflexibility of local plans could hinder the adaptation needed to accommodate these advancements. As such, we suggest that all renewable energy and energy storage infrastructure be treated as a Critical National Priority, with local authorities adopting supportive criteria-based policy to help shape development in their local area.

There should not be a requirement for local authorities to designate areas for renewable energy. However, if local authorities do choose to designate areas for renewable energy, we suggest that these should be designated as priority/acceleration areas, informed by studies such as a Local Area Energy Plan, with renewable developments outside of these areas being informed by a positive criteria-based policy. Establishing a national dataset on technically suitable areas for renewable energy could also help to facilitate this process and ensure that any identified areas are clearly evidence based.

Additionally, Paragraph 165 requires planning applications outside identified areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas. This could prove challenging and create additional disparity across local authorities, potentially also leading to unintended consenting delays. Instead, assessing applications using a positive criteria-based policy would help to promote development.

**In summary: we suggest that local authorities are not required to allocate suitable areas for renewable energy. Instead, we suggest that all renewable energy and energy storage infrastructure be treated as a Critical National Priority, with local authorities adopting supportive criteria-based policy to help shape development.**

## Direct support for community-led energy needs to be re-introduced to the NPPF

Community-owned energy projects have a [unique role to play](#) in helping to increase our renewable energy generation in a way that directly benefits communities and provides additional benefits, such as increased engagement and understanding of the energy system. As such, it is important that the planning system helps to facilitate these projects. While we appreciate that the amended wording regarding support for renewable energy projects is aimed at supporting projects of all scales, we see value in highlighting the importance of community projects more clearly. We thus suggest that an amended version of the deleted paragraph 161 is re-introduced to state that community-led renewable energy applications should be given weight in planning. Additionally, a consistent, free, pre-application advice service should be offered to any community energy project.

**For the proposed changes to the NPPF to give greater support to renewable and low-carbon energy changes, they need to come alongside the increased resourcing and training of local planning authorities and the training of local councillors.**

If any of the above policy changes are to have an impact, the resourcing issues facing local planning authorities must be addressed. [Research conducted by the Royal Town Planning Institute](#) identified that between 2013 and 2020, 25% of planners left the public sector. Moreover, the [Local Government Association's 2022 workforce survey](#) revealed that 58% of local authorities in England faced difficulties recruiting as many planners as they needed. These resourcing constraints already directly impact applicants, hindering their ability to initiate pre-application discussions and to engage with local authorities throughout the application process, as well as causing delays in decision making. Many Local Planning Authorities struggle to attract and retain staff, often due to pay and career advancement concerns. Addressing these underlying resourcing challenges is essential to improving the planning system.

As set out in our response to question 72, we suggest the introduction of specialist renewable energy planners who work across local authorities with the sole focus on renewable energy applications. This dedicated expertise would help to streamline the local planning process, ensuring that applications are processed more efficiently and effectively. We also suggest that the government build upon work started under the planning skills delivery fund to undertake a review of pay, working conditions and career progression for local authority planners and increase the target of hiring 300 new local authority planners to 1000 infrastructure-focused planners in England, with additional targets for Wales and Scotland.

Training, for local authority planners and local councillors, will also be important to ensure speed and consistency in decision making.

**In summary: For reforms to the NPPF to have an impact, we urge the local authority resourcing issues to be addressed, including introducing renewable energy specialist planners working across local authorities.**

## Question 74: Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?

Renewable energy development can play a significant role in protecting carbon-rich soils and restoring degraded peatlands. Examples such as [Whitelee Wind Farm](#) have successfully integrated wind farm development within peatland environments, delivering peatland restoration. This best practice shows that renewable development and peatland protection are not mutually exclusive; careful planning and innovative approaches can ensure that renewable energy projects contribute positively to both energy objectives and environmental conservation.

Given this context, it is important that national policy does not simply preclude energy developments in certain areas. Instead, we advocate for an approach similar to Scotland's NPF4 Policy 5, which emphasises protecting and restoring valued soils, including carbon-rich soils, while still allowing for carefully considered development. This policy framework is built on the following principles:

- Protecting and restoring valued soils
- Ensuring soils, particularly carbon-rich soils, continue to sequester and store carbon
- Maintaining healthy soils that provide essential ecosystem services for nature, people, and the economy.

Under this approach, development proposals would be supported only if they adhere to the mitigation hierarchy by first avoiding and then minimising soil disturbance on undeveloped land. Projects must also be designed and constructed in such a way that protects soils from damage, including compaction and erosion, while minimising soil sealing.

A balanced approach that allows for sensitive development can facilitate beneficial restoration projects, ensuring that renewable energy initiatives enhance peatland health rather than compromise it. This approach would also avoid a de facto ban, which could otherwise impede the restoration and sustainable management of these critical habitats.

## Setting the NSIP threshold for solar generating stations and onshore wind

Question 75: Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?

**Having engaged with various renewable energy developers, we support the change in the threshold level from 50MW to 100MW. However, this change to the threshold must come alongside all forms of renewable energy being defined as a Critical National Priority (CNP) regardless of which planning regime they fall under. Additionally, we would suggest that there is a future review of this threshold change.**

Given the geographic constraints across England, it is unlikely that many onshore wind farms would exceed the proposed 100MW threshold, as suitable sites for such large developments in England are increasingly rare. Therefore, raising the threshold to 100MW may not significantly increase the number of projects falling under the NSIP regime, leaving the majority still under the jurisdiction of Local Planning Authorities via the TCPA regime. Adequate resourcing and training of local authorities will thus be essential.

As highlighted in our response to question 72, the primary challenge lies in minimising inconsistencies between the TCPA and NSIP consenting regimes, regardless of where the threshold is set. The disparities between these regimes—especially regarding the likelihood of positive decisions, timescales, level of work involved and costs—present significant challenges for developers. Overall, there is a need to ensure that the planning process is proportionate to the scale of the development. As onshore wind has been stalled for such a long period, we want to ensure that the planning system facilitates, rather than hinders development.

Applications for Development Consent Orders (DCOs) under the NSIP regime are significantly more resource-intensive compared to those made under the TCPA. This is due to the additional burdens associated with the NSIP process, including the more comprehensive environmental assessments and extensive consultation requirements.

It is also crucial to consider the implications for projects currently in preparation. A clear and well-defined interim period is necessary to ensure that any changes to the threshold do not result in significant challenges or delays for these projects. As mentioned in response to question 72, this should include clarification that the new NPPF overrides outdated local authority policies on onshore wind.



## Question 76: Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?

We recognise the challenges the current system presents for solar projects and believe that adjusting the threshold could address several of these issues. We thus support the change from 50MW to 150MW. This change to the threshold must come alongside all forms of renewable energy being defined as a Critical National Priority (CNP) regardless of which planning regime they fall under and alongside increased resourcing of local planning authorities.

The current 50MW threshold has led to an artificial constraint on the size of some solar projects. Some developers have been designing projects to stay below this threshold to avoid the additional costs, extended timelines, and complexities associated with the NSIP regime. As a result, very few projects in the 50-150MW range have come forward.

Raising the threshold could help encourage the development of large-scale solar projects at the local level, which could be advantageous. While local determination through TCPA comes with its own set of challenges, it is often a timelier process. This could lead to faster deployment of solar energy projects, which is crucial for meeting the UK's renewable energy targets.

However, there are benefits to the NSIP process that should not be overlooked. NSIP applications offer greater clarity and consistency, whereas decisions under the TCPA can be more variable on issues such as the weight given to land use and visual impacts. As such, **this change to threshold would need to come alongside our call, set out in our response to Q73, for all renewable energy projects to be defined as a Critical National Priority regardless of the planning regime and for the increased resourcing of local planning authorities through specialist renewable energy planners.**

## Tackling climate change

### Question 78: In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?

The planning system must prioritise action on climate, and this should be articulated through a definition of the purpose of planning in the NPPF that reflects the crucial role of planning in securing our future in a changing climate. As such, planning policies and all planning decisions must be in line with the objectives and provisions of the Climate Change Act 2008, including the 2050 net zero carbon target, our binding Nationally Determined Contribution (NDC) under the Paris Agreement, and the detailed provisions of the Sixth Carbon Budget.

Specifically, we would like to see the insertion of the following wording after paragraph 8 of the current NPPF:

‘Climate change is the greatest long-term challenge facing the world today. Addressing climate change is therefore the principal concern for sustainable development. For the avoidance of doubt, achieving sustainable development includes securing the mitigation of, and adaptation to, climate change. All planning strategies, and the decisions taken in support of them, must reflect the ambition to help business and communities build a zero-carbon future and prepare for the impacts of climate change. Accordingly, planning policies and all planning decisions must be in line with the objectives and provisions of Climate Change Act 2008 including the 2050 net zero carbon target.’

### Question 79: What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?

We are aware that local authorities have been using different carbon accounting tools to inform their local plans. We suggest that government should commission research to explore the different approaches being used and subsequently develop a standardised methodology which can be adopted across local authorities. Support and training will also need to be provided to local authorities.

### Question 81: Do you have any other comments on actions that can be taken through planning to address climate change?

Renewables are pivotal in meeting our climate goals and achieving net-zero emissions. Therefore, planning policies and procedures should be designed to facilitate and expedite the

deployment of renewable energy infrastructure. This includes ensuring that planning frameworks identify renewable projects as a Critical National Priority (please see our response to question 73.)

In light of the recent supreme court decision, there is a need for the NPPF to be updated to provide a **clear presumption against all fossil fuel exploration and extraction**.

## Availability of agricultural land for food production

### Question 82: Do you agree with removal of this text from the footnote?

#### Yes

We agree with the removal of this text from the footnote. Eliminating this footnote will help to address a fundamental disparity in how applications for solar farms are considered. Currently, the NPPF includes references to the consideration of agricultural land for food production, which local planning authorities have often used as grounds to refuse planning permission for solar farms. This has created an inconsistency, particularly when compared to the approach taken at the NSIP level.

At the NSIP level, under the guidance of EN-3, renewable energy generation is recognised as “Critical National Priority” infrastructure. The benefits to national security, the economy, commercial interests, and achieving net-zero targets are generally considered to outweigh any negative impacts. Importantly, EN-3 advises that the grade of agricultural land used for solar farms “should not be a predominating factor” in determining applications. This more balanced approach aligns with the urgent need to decarbonise our power system.

Removing the footnote will bring the treatment of solar farm applications at the local level more in line with the national framework. This change should make the rules clearer for decision-makers, reducing the frequency of refusals based on the agricultural land argument and decreasing the likelihood of appeals. Consequently, this could accelerate the development of solar farms, contributing more rapidly to our national decarbonisation efforts.

It's also important to note that solar farms do not pose a significant threat to the nation's food security. Even when using the higher estimates of how much solar energy we need to meet net zero by 2050, solar would only cover 0.5% of all farmland. This minimal impact on agricultural land should further reinforce the appropriateness of removing the footnote.

### Question 86: Do you have any other suggestions relating to the proposal in this chapter?

We recommend that the NPPF provides more detailed policy for repowering and life extension of onshore wind projects. We estimate that over 150 UK onshore wind farms, totalling over 3 GW of capacity and more than 1,500 individual turbines, are expected to make repowering decisions by 2030. Getting repowering right is essential for ensuring that our overall onshore wind energy output does not decrease, and for maintaining the industry's reputation when developing new sites.

To date, local authority planners have faced challenges in making decisions on repowering due to the lack of policy detail and guidance for planners in England. There is a need to provide more policy certainty for decision makers. We thus suggest the following:

- The development of a more detailed and supportive repowering policy, including confirmation of the aspects that need to be given material consideration and detailed guidance on how local authorities should assess the change in visual impacts created by larger turbines. This should involve confirming the baseline on which repowering applications should be assessed
- A supportive policy for repowering needs to provide details regarding what should be considered as part of applications, including greater environmental and community enhancements
- Consideration of repowering of solar infrastructure as well as onshore wind.

Additionally, most of the oldest wind farms have 25-year planning consents, but infrastructure can often last longer. There should be a quick and certain consenting route for extending planning consents to keep the same infrastructure operational for longer (known as asset life extension). Cases such as blade length extensions or partial repowering, where parts of the infrastructure are being replaced, need to be considered. MHCLG should work with the onshore wind task force to explore these issues to ensure that the consenting process is timely and appropriate.

## Brownfield, grey belt and the Green Belt

**Question 31: Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release?**

We support the proposal to allow the release of grey belt land to meet commercial and other development needs. However, we advocate for the explicit inclusion of renewable energy infrastructure (including Battery Energy Storage Systems (BESS)) in the grey belt designation.

Grey belt land presents a significant opportunity for renewable energy development, particularly for solar and battery energy storage systems (BESS), and potentially for some onshore wind (in suitable locations). Grey belt areas typically present lower environmental sensitivity and can serve as ideal sites for renewable energy and storage developments.

**In summary: while we support the broader proposal to release grey belt land for development, we recommend that renewable energy and battery storage projects are explicitly included in this designation.**

**Question 46: Do you have any other suggestions relating to the proposals in this chapter?**

Under the current policy framework, renewable energy projects can be approved on Green Belt land under "very special circumstances". We suggest that there should be a change to existing paragraph 156 of the NPPF, regarding the definition of Very Special Circumstances (VSC) for development in the greenbelt.

Grid connections provide a central challenge to renewable energy deployment, significantly impacting potential site selection. However, there are areas within the existing greenbelt designation that have available grid connections and could provide suitable areas for renewable energy development. We thus suggest that paragraph 156 is updated to reflect grid connection as a VCS.

An amendment to existing paragraph 156 (now 154) could read as follows (changed text in italics):

156. When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances *will* include the wider environmental benefits associated with increased production of energy from renewable sources *and the location and nature of any agreed point of connection to the electricity network.*

## Data centres

### Question 62: Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF

Data centres are potentially substantial new sources of electricity demand in local areas. With net zero at the core of the NPPF, planning should require data centre developers to consider how the waste heat produced could be used — for example, in heat networks. This should be taken into account when granting planning permission.