WILTSHIRE CLIMATE ALLIANCE ONSHORE WIND POLICY PAPER FEBRUARY 2023

Summary

Onshore wind is one of the cheapest ways to generate electricity and can make a vital contribution towards UK energy independence and lower energy prices, as well as boosting the UK's green economy. Expansion of onshore wind is essential for the UK to meet its legally binding net zero targets and enjoys strong public support. However, a small, vocal minority object to onshore wind, often raising misleading objections. In response to this minority, the Westminster government effectively banned new onshore wind turbines in England in 2015.

Following many years of campaigning from climate action groups, the government is finally consulting on whether that ban should be modified, but the consultation leaves open the possibility that barriers to sensible deployment of onshore wind could remain.

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- Wiltshire Climate Alliance urges members of the public to respond to this consultation (which closes on 2nd March), and we provide an easy response mechanism to guide responses.
- We also ask Wiltshire Council to start preparing a meaningful planning framework for deployment of onshore wind in Wiltshire, which currently has no wind turbines.
- We also encourage wind developers (once the ban is lifted) to engage with local communities, in particular looking at how the benefits of onshore wind can be shared with these communities.

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The economics of onshore wind

Onshore wind is one of the cheapest ways to generate electricity and can make a vital contribution towards UK energy independence and lower energy prices. Onshore wind generated 11% of the UK's electricity in 2022, according to National Grid. The latest available prices for new electricity generation (Carbon Brief, August 2022) are (in £/MWh):

- Gas 446
- Nuclear 106
- Solar 55
- Onshore wind 50
- Offshore wind 44.

While wholesale gas prices have fallen since August 2022, it remains a much more expensive way to generate electricity than wind and solar, relies to a large extent on imports exposing the UK to geopolitical risk, and obviously adds to carbon emissions. Onshore wind is cheap, can be quick to install (if the right planning policies exist) and is not dependent on foreign governments.

RenewableUK notes that new onshore wind farms would bring billions of pounds of private investment to the UK and support new jobs. For example, building the onshore wind we need to achieve net zero (30GW by 2030, compared to around 15GW now) would add £45bn of gross value added (GVA) to the economy and support 27,000 jobs by 2030, and 30,000 more in the years that follow. The CBI, MakeUK, the Federation of Small Businesses and the National Farmers Union all support the expansion of onshore wind.

Onshore wind's role in net zero

Meeting our legally binding net zero targets requires a doubling of onshore wind capacity by 2030. The government's current onshore wind planning consultation recognises this: 'onshore wind is an efficient, cheap and widely supported technology - we know that achieving net zero and meeting the UK's legally binding decarbonisation targets will require an increase in locally supported onshore wind' (NPPF consultation, Dec 2022). The government's recent Net Zero Review states: 'now is the time to turbo-charge a drive towards greater onshore wind provision' and recommends that 'the planning system needs to be reformed to achieve rapid deployment' as onshore wind is 'one of the fastest, lowest cost solutions to rapid delivery of Net Zero' (Net Zero Review).

Public support for onshore wind

Onshore wind enjoys strong public support. The Public Attitudes Tracker, published quarterly by the Department for Business, Energy and Industrial Strategy shows that onshore wind deployment is supported by c78% of the population (NPPF Consultation). This rises to 87% in a recent YouGov poll where local residents benefit directly from lower energy costs. RenewableUK research found that 76% of people would support a renewable energy project in their local area, and 72% of people who already live within 5 miles of a wind farm would support building more.

Objections to onshore wind

A small but vocal minority object to onshore wind and raise misleading objections which need to be dispelled. Typical objections, and the facts, are:

- *Turbines only generate when the wind is blowing.* Turbines generate energy 85% of the time on average, and their very low cost takes this into account. Onshore wind can provide a significant share of electricity generation when complemented by other low carbon forms of generation including offshore wind, solar, hydro and nuclear. The national grid is being adapted to manage variations in supply and demand through 'smart grid' innovations and increased storage.
- *Owners of wind turbines are paid not to generate electricity.* This is true, but is commonplace in the electricity generation industry, as spare capacity is needed to enable supply and demand to be matched on the electricity grid. It applies equally to owners of gas and diesel turbine generation and is taken into account in the low cost of onshore wind.
- *Wind turbines aren't really low carbon, when you take into account the steel and concrete required.* Onshore wind has the lowest lifecycle carbon emissions of any generation technology, according to the European Wind Energy Association, with the embodied carbon from steel and concrete used in manufacture offset within about six months of operation.
- *Turbines are noisy and damaging to health.* Modern wind turbines are remarkably quiet. According to General Electric (GE), at 500m distance (a typical minimum separation from housing) the sound from a turbine is 38 decibels, below normal background noise levels of 40-45 decibels and therefore inaudible. The health concerns relate to electromagnetic radiation and are no more supported by any factual evidence than are conspiracy theories about 5G.
- *Turbines are a threat to birds.* Major charities such as WWF and RSPB support onshore wind turbines sited appropriately to take account of bird movements and see the effects of climate change as a far greater threat to wildlife generally.
- *Turbines are ugly and intrusive.* This is a subjective view and depends entirely on the context. Existing planning rules already restrict development in designated areas like National Parks, AONBs, Conservation Areas etc, and the visual impact of wind turbines is a key consideration in the planning process.

Community benefits from onshore wind

Wind farms offer significant community benefits for people living nearby:

- Substantial community benefit funds (which tend to be higher than for other renewable technologies); Scottish government guidance is £5000 per MW index-linked per year England could follow suit, although no guidance exists currently.
- Local electricity discount schemes for local residents these are currently offered by <u>Octopus</u> <u>Energy</u> in some areas.
- Shared ownership and community-owned projects which allow more of the profits to be retained locally, such as <u>Westmill wind farm</u> near Swindon.

To encourage the community energy sector, local and national government need to:

- Pass legislation that incentivises the sector, for example the Local Electricity Bill.
- Make Social Investment Tax Relief available for investment in community energy.
- Provide a community smart export guarantee or similar arrangement.
- Support community energy planning applications in local planning decisions.
- Improve local grid connection capacity.

Planning policy for onshore wind

The government effectively banned new onshore wind turbines in England in 2015, by introducing changes (without any public consultation) to the National Planning Policy Framework (NPPF). This introduced two new requirements: first, that any new planning application for onshore wind needs to be explicitly provided for in a Local or Neighbourhood Plan, and second, that the applicant can demonstrate that planning impacts identified by the affected local community have been 'fully addressed' and the proposal has 'community backing'. This may sound reasonable enough; however no other infrastructure project requires such a high bar. Roads, railways, airports, housing estates, factories, shopping centres, incinerators, even nuclear power stations – none of these has the same restrictions, despite often being bitterly opposed by local residents. If the same restrictions applied to such developments, the UK economy would grind to a halt.

The ban does not apply to Scotland or Wales, both of which have sensible planning policies which enable onshore wind to be developed, taking into account all appropriate constraints.

The role of the planning system is to achieve a balance between economic, environmental and local community impacts, weighing the benefits of development against potential harms. The planning system has perfectly adequate safeguards to prevent inappropriate siting of wind turbines. National Parks, Areas of Outstanding Natural Beauty, Conservation Areas, World Heritage sites and similar designations provide significant protection against all types of development, and the planning system already provides for local people to be consulted and their concerns considered and balanced against other priorities – of which cheap, green energy is significant.

The NPPF consultation acknowledges the compelling environmental and economic case for scaling up onshore wind. It removes the first barrier - the requirement for wind turbines to be included in a Local or Neighbourhood Plan, which we welcome. However, it continues to suggest that 'demonstrable local support' is still required - over and above that which would apply to any other type of development - without defining what this means. It also requires 'satisfactorily addressing the planning impact of onshore wind projects identified by local communities'. Again, this is not defined, allowing local planning authorities to interpret this in an arbitrary and subjective way. The planning process already consults local people and invites them to share their views on proposed developments, with an array of professional consultees scrutinising material planning considerations such as landscape, noise and ecological impacts. As these proposals also apply to 'repowering' of existing onshore wind turbines (replacing turbines which have come to the end of their useful life with new, more efficient turbines), there is a danger that existing onshore wind capacity could be significantly reduced. The first commercial wind farm in England was built in 1991; many older turbines will require repowering in the near future.

In our response to the consultation, we urge the government to create a level playing field for onshore wind, using the existing planning framework. Removing the new restrictions proposed in the current consultation will not mean onshore wind turbines are installed everywhere - clearly constraints remain in terms of wind speeds, grid availability and material planning considerations. But it will allow the industry to expand to support the UK's legally binding climate targets. If the proposed restrictions remain, wind developers are unlikely to risk bringing forward any new development proposals in England, given the costs involved and the low prospect of success, according to Regen (see link below).

The Net Zero Review proposes the UK *should 'reform the planning system at local and national level to place net zero at its heart*. These reforms should ensure *'solar and onshore wind can be developed more easily, helping communities reap the benefits of cheaper low-carbon electricity.* 'This requires changes to the planning system to *'streamline the planning and environmental permitting process'* and provide *'clear guidance'* to planners on how to evaluate onshore wind applications. We agree!

We encourage members of the public to respond to the NPPF consultation and provide a link to a model answer to guide responses (see links below). The consultation closes on 2nd March.

Recommendations for Wiltshire Council and onshore wind developers

Wiltshire Council needs to play its part in delivering the UK's net zero goals and achieving low cost, UK based energy generation. Research commissioned by Wiltshire Council in 2011, and available on their website, identified 60 sites in Wiltshire with good wind speeds, and which respect all existing land use restrictions, such as AONB, Conservation Areas, World Heritage Sites, and proximity to housing. We urge the Council to:

- Submit a response to the NPPF consultation in line with our recommendations above, specifically to ask for the proposed restrictions on onshore wind to be removed and for planning applications to be subject to the existing planning process.
- Prepare a planning framework for deployment of onshore wind in Wiltshire, which sets out clear criteria against which planning applications will be evaluated. This framework should be included in the forthcoming Local Plan update, but as the requirement for inclusion in the Local Plan has already been removed from the NPPF, the Council need not, and should not, wait for the next iteration of the Local Plan before publishing this framework.

We encourage Wiltshire residents to write to their Wiltshire Councillor and ask them to support the above actions. We also ask residents to write to their MP and ask for the new restrictions proposed in the NPPF consultation to be removed. Even a few turbines in Wiltshire would make a big difference to our renewable generation capacity and help the Council move closer to its stated goal of making Wiltshire Net Zero by 2030.

We also encourage wind developers, when the ban is lifted, to consult widely with local communities. In particular, we support the proposals in the NPPF and the Net Zero Review that, where feasible, local communities should benefit from the lower cost electricity generated, although this should not be an absolute requirement. Wiltshire has several active Community Energy organisations which could be involved in delivering such benefits to local communities.

Responding to the NPPF consultation

The NPPF consultation closes on 2nd March 2023. The climate change campaign group 'Possible' has provided an easy-to-use response form on their website to enable anyone to send their comments on the NPPF consultation. You can edit and modify the response as you see fit, for example to say that you support onshore wind within Wiltshire:

www.wearepossible.org/actions-blog/tell-the-government-you-support-wind-power

Regen, the independent centre of expertise on renewable energy generation, has produced a briefing paper on the onshore wind consultation which also contains their response to the consultation questions:

www.regen.co.uk

About Wiltshire Climate Alliance

Wiltshire Climate Alliance (WCA) is an umbrella organisation for local groups and individuals to campaign for action on climate change. WCA welcomes a wide variety of groups and individuals whose common characteristic is that they care passionately about the challenges of climate change and the impact of human activity on the environment.

WCA currently represents over 30 groups:

Bath & West Community Energy, Bremzero, Calne Fair Trade Community, Calne Community Nature Reserve, Carbon Neutral Aldbourne, Climate Friendly Bradford on Avon, Corsham Climate Action, Downton Green Group, Extinction Rebellion, Local Environment Action Friends (LEAF), Malmesbury Community Climate Action Network, Nadder Community Energy, Rode Climate Emergency Group, Royal Wooton Bassett Environmental Group, Schools for Environmental Action, Salisbury Area Greenspace Partnership, Salisbury Community Energy, Salisbury Democracy Alliance, Salisbury Transition City, Sustainable Calne, Sustainable Devizes, Sustainable Warminster, Swindon Climate Action Network/Friends of the Earth, The Birds & The Bees, The Friends of Marden Valley, Tisbury Community Benefit Society, Transition Marlborough, Trowbridge Environmental Community, Verify Humanity, Young Nature Watch, Wild Colerne, Zero Chippenham.

WCA has different topic groups looking at climate-related issues like these across Wiltshire – including energy, land use, and sustainable development and welcomes the involvement of new members. Find out more on the website: https://www.wiltshireclimatealliance.org.uk/joinus

