

Briefing

Reforming planning for decarbonised power: with net zero, nature and the public at its heart

February 2024

Summary

For the UK to reach its goal of a decarbonised power system by 2035, it urgently needs to speed up delivery of renewable energy projects and the electricity network infrastructure that provides power to homes and businesses across the country.

Despite UK progress in renewable infrastructure rollout, the pace has slowed in recent years. Since 2012, consenting times for Nationally Significant Infrastructure Projects (NSIPs) have increased by 65 per cent to over four years.¹

The planning system is not the only barrier, with projects also held up by issues such as how fast new connections can be made to the grid and competition for components in a highly competitive global supply chain.

Most planning delays arise from technical issues such as unclear guidance, under resourcing and a lack of national and regional scale planning.

At the same time, the planning system ensures environmental assessments are incorporated into decision making. These assessments, however, are said by some developers and politicians to contribute to delays. Ignoring or bulldozing through these concerns might look like quick wins but risks a backlash further down the line, as previously happened with onshore wind.

The government is addressing some of these issues. But momentum needs to be maintained, as well as achieving wider buy-in to what needs to change from affected stakeholders and ensuring nature is protected.

In this briefing, we map out the politics of planning reform for renewable energy and the routes the government can take to a more resilient renewables centred UK power system, while protecting and restoring nature.

Our recommendations include the need for a strategic spatial plan, informed by robust environmental data; a public communication campaign on the

renewable energy and grid infrastructure needed; increasing the Biodiversity Net Gain requirement from ten to 20 per cent for NSIPs; and ramping up the deployment of rooftop solar.

These recommendations are designed to reduce timelines for building renewable energy infrastructure, address public opposition to development and protect nature.

An introduction to planning for energy

The planning system for energy infrastructure is primarily governed by two plans: the National Planning Policy Framework (NPPF) and the Energy National Policy Statement (NPS). These provide a framework for developers to follow, answering how and what they should build, where they can build and what mitigations are necessary to complete projects.

Projects with a generating capacity of over 50 megawatts (MW) need planning permission from the Planning Inspectorate, an executive body of the Department of Levelling Up, Housing and Communities (DLUHC). These are termed Nationally Significant Infrastructure Projects (NSIPs) and were created in 2008, through the Planning Act, to ensure that national infrastructure was delivered in a timely way. Smaller projects are governed by the Town and Country Planning Act and require approval from local authority planners.

Beyond the policy guidance, a developer is required to consult with a range of bodies that may be affected by a development. These include landowners, the local community and relevant bodies, such as the Forestry Commission or the Environment Agency.

Gaining planning permission is often a long winded process. Timelines are being increasingly stretched at a time when several national priorities, including moving to a clean power system, demand swift delivery.

The need for action

Progress has been made in developing domestic renewable energy but a big lift is needed soon to meet the British Energy Security Strategy: to deploy 50GW of offshore wind and eight nuclear reactors by 2030, plus the five-fold increase in solar deployment necessary to reach 70GW by 2035.² To support these targets, big swathes of additional electricity network capacity are required. The National Grid's Holistic Network Design (HND) is an integrated

plan that will take 23GW of windpower from the generation source to consumers across Britain, but more network development is still needed to fulfil the British Energy Security Strategy.

Political context

Planning is becoming a political battleground in the run up to the 2024 general election. Manifesto pledges on housing, energy and transport all rely on planning reform, particularly in an era of fiscal restraint.

Speeding up the delivery of renewable energy infrastructure is a priority for both major political parties. In 2021, the Conservative Party committed to a renewable power sector by 2035. The Labour Party has pledged to make the UK a 'clean energy superpower' by 2030, if elected. However, analysts suggest that both targets will be challenging to reach, in part because of delays in and around the planning system.

These pledges have led to increased debate and activity focused on planning. In 2022, the government commissioned Nick Winser, the electricity networks commissioner, to review the delivery of transmission infrastructure.

Following his report, the government accepted his recommendations and introduced a Transmission Acceleration Action Plan adopting many of his proposals. It has also updated the NPPF, mainly regarding planning for new homes, and the National Policy Statement for Energy (NPS) as the previous version dated back to 2011.

Additionally, the government reformed the grid connection queue to ensure grid connection timelines take no more than six months on average beyond the operator's requested network connection date.

Meanwhile, at the 2023 Labour Party conference, Keir Starmer pledged to "bulldoze" through the restrictive planning system to deliver on national priorities around energy and housing.

Despite the reforms, some Conservative MPs are unenthusiastic about infrastructure development, with several facing local opposition in their constituencies, such as in East Anglia where development will be needed to connect offshore generated energy to homes and businesses. Campaigns against infrastructure are often organised in rural Conservative seats where transmission infrastructure is needed to carry energy to major demand

centres. This became a particularly awkward dilemma for Therese Coffey, Suffolk Coastal MP, during her time as environment secretary (October 2022-November 2023).

However, recent polling, on behalf of the Conservative Environment Network (CEN), of 19 Conservative held parliamentary seats, shows broad support for renewable energy. Eighty two per cent of people agreed that ‘we need to build more renewable energy sources in the UK’, including over three quarters of 2019 Conservative voters. The polling also demonstrated that 65 per cent of constituents want their MP to encourage local renewable energy developments, along with general support for wind and solar developments, even if built within three miles of voters’ homes. All voters, however, including supporters of local infrastructure developments, think they are not adequately consulted about local projects.³ Delays and poor communication are important factors contributing to local frustration.

The context in which local communities first hear of new projects is also important to consider, with relatively little public airing of the kinds of trade-offs needed if the UK is to tackle climate change. There is also little information given about the considerable co-benefits that measures like the decarbonisation of the grid can bring for energy security and cutting consumer energy bills.

Politically, a public communication campaign on the renewable energy and grid infrastructure needed to reach a decarbonised energy system, and what should be expected in certain regions, is fundamental to bringing the public along with the transition.

Concerns about impacts on nature

The UK is one of the most nature depleted countries in the world.⁴ And climate change is one of the biggest threats to nature. It is important nonetheless that infrastructure projects aimed at addressing climate change avoid further harm to habitats and wildlife.

Concerns over the nature impacts of electricity infrastructure risk splitting opinion in the environmental sector and reducing the collective expertise and power they have to ensure better planning and delivery.

It is also important to distinguish concerns about nature from those about landscapes and amenities by dealing with them separately. If the reason

projects attract objections is the visual impact or local disruption, that should be addressed by tailored solutions, such as community benefit payments and design modifications.

Damage to nature can be offset through policies such as Biodiversity Net Gain (BNG), which can tie land based infrastructure delivery to a positive impact on the local environment, compared to what was there before the development. Developers are required to deliver ten per cent BNG via nature restoration. However, BNG will only be successful with adequate monitoring and enforcement.

Research by the Department for Environment, Food and Rural Affairs (Defra) shows that the predicted cost of achieving a 20 per cent BNG outcome is approximately one per cent of capital costs of ten per cent equivalent, leading to many environmental organisations calling for the minimum BNG requirement on developers to be increased.

The most prevalent complaint among nature groups is of pro-development reforms targeting environmental assessments; for instance, the current proposal to move from environmental impact assessments (EIAs) to environment outcome reports (EORs) has been opposed because it would give the government significant discretion over whether an EOR will be undertaken and how wide its scope would be.

Nature organisations' trust in the government was damaged by the proposed amendments to the Levelling-up and Regeneration Bill that would have removed nutrient neutrality requirements for developments from habitat regulations and undermined laws protecting water quality. It took a concerted campaign from parliamentarians, nature organisations and expert input from statutory bodies, such as Natural England and the Office for Environmental Protection, to highlight other ways to speed up housebuilding and prevent the weakening of these important laws.^{5,6}

Additionally, there is a lack of ecological knowledge in local authorities and government. Vulnerable species are at risk of poor decisions being made which could lead to their permanent loss. There is an urgent need for spatial planning, particularly for the marine environment, to be informed by robust environmental data.

Politically, some perceive offshore wind to be easier to deliver than onshore wind, as it faces less local opposition. But this comes with a risk to nature. The

marine environment is complex and there is significant uncertainty attached to the cumulative impact of mass offshore wind developments. It is feared the damage caused might be identified too late. Offshore windfarm construction and operation has an impact on many species, eg red throated divers have shown a 52 per cent reduction in abundance within 10km of wind farms in the North Sea.⁷

What causes delays?

Delays throughout the renewable energy planning system compound costs for developers, discouraging development and investment. Some common causes of delays include:

- Out of date and ambiguous policies (NPPF and Energy NPS) make responsibilities for stakeholders and planners unclear. Although limited updates were made in 2023 to those documents, it is too soon to see the impacts. Barriers to onshore wind development have been lowered but some remain. In general, the weight the environment holds in planning decisions is unclear and inconsistent with national priorities.
- Lengthy public consultations, objections and judicial review processes are time intensive.
- Lack of data collection, monitoring and sharing between projects.
- The length of the grid connection queue, which includes many speculative clean energy projects. The government has recognised the impact of this and has introduced a Connections Action Plan in November 2023 to help speed up connections for viable projects, although its impact remains to be seen.
- Lack of resourcing for planners, leading to process delays and a loss of skills from the public sector. The Royal Town Planning Institute reports that the public sector has lost around a quarter of its planners since 2013. It has become a less attractive profession: adjusted for consumer prices index (CPI) inflation, the median salary of a town planner in 2005 was £48,000 compared to £34,000 in 2022.⁸

Recommendations and progress

Rather than a major overhaul of the current planning system, which could take considerable time and political effort, even if the intention was to simplify it (which risks backlash) we suggest that the current system is instead streamlined, with shorter timelines and better resourcing.

Planning reforms should be part of a wider holistic approach that also works with nature, builds domestic supply chains, boosts energy infrastructure, as well as with the current standard approaches, and gets better stakeholder and local community buy-in.

Below, we map the range of recommendations frequently made by environmental NGOs and the energy industry during our recent engagements with them.

This broad range of recommendations seeks to address energy infrastructure planning delays, to protect and restore nature linked to renewable energy and grid infrastructure development and to minimise national and local public opposition to new renewable and grid infrastructure. We list recommendations alongside the government’s action to date, which we have graded using a traffic light system based on our qualitative research, and the next steps necessary to ensure progress.

Recommendation	Government action to date	Next steps
The current planning system		
Remove special planning requirements for onshore wind in England from the NPPF, allowing local authorities to treat it the same as other forms of renewable energy.	In September 2023, the government removed the de facto ban on onshore wind if one individual opposes it but still no new plans for onshore wind have been accepted since. Blocks still remain that are absent for other	Remove the special planning requirements for onshore wind from the NPPF to increase the potential for deployment, while protecting National Parks and Areas of Outstanding Natural Beauty.

	forms of energy infrastructure.	
Strategic spatial planning informed by robust environmental data.	<p>There is a commitment to a Strategic Spatial Energy Plan (SSEP) but delivery is not expected until 2025.</p> <p>Poor progress has been made on marine spatial planning due to the complexity of the environment and lack of environmental data sharing from energy projects.</p>	<p>Create a central environmental data log where environmental assessments share information to speed up delivery on similar and closely located projects.</p> <p>Develop country level marine plans for offshore renewables (as in Scotland) to manage the ecological impact of offshore wind development, leaving the most ecologically valuable areas free from development.</p>
Reform public engagement processes to narrow the scope on which aspects of projects local people can influence, rather than hosting broad discussions on the need for the development of energy infrastructure.	Despite needing to consult on projects at the pre-application stage, consultations are perceived to be lacking and decisions are thought to have already been taken before direct engagement with local communities.	<p>Identify issues that local people can influence at the project level such as pylon design and how collective community benefits are spent.</p> <p>Use artificial intelligence (AI) to speed up consultation processes around transmission infrastructure route design.</p>
Make community benefits mandatory for developers of renewable energy	In the 2023 Autumn Statement, the chancellor announced	Implement the proposed community benefits policy by following recommendations in the

and grid network infrastructure.	proposals for community benefits.	Electricity Networks Commissioner's report.
Beyond the planning system		
Introduce Biodiversity Net Gain (BNG) to tie infrastructure development to nature restoration.	As of February 2024, major projects under the Town and Country Planning Act must achieve ten per cent BNG to be included. Smaller projects will be required to include BNG from April 2024 with Nationally Significant Infrastructure Projects (NSIPs) following suit in November 2025.	Boost the BNG requirement from ten to 20 per cent for NSIPs and equip relevant bodies to monitor and enforce BNG in the long term.
Develop the use of AI-derived route design.	Introduced a 'pro-innovation' AI regulation white paper.	Clarify regulation of existing AI processes. Translate principles of the government's AI regulation white paper into an energy infrastructure context and determine what additional (if any) regulation is needed. Review the international AI landscape in an energy infrastructure context to learn from best practice adoption.
Deliver a public communication campaign on the renewable energy	The government committed to a national information campaign on the need for	National, regional and local politicians, utility providers and environmental NGOs

<p>and grid infrastructure needed to reach a decarbonised energy system by 2035.</p>	<p>electricity infrastructure and the benefits it can bring to communities in 2023, yet some politicians still engage in and encourage campaigns opposing it.</p> <p>National Grid has introduced the Great Grid Upgrade campaign.</p>	<p>need to play a role in raising awareness and improving understanding of why it is necessary to develop renewable energy generation and grid infrastructure.</p>
<p>Adequate resourcing of the planning system.</p>	<p>Around a quarter of public sector planners have been lost since 2013. Planners' salaries have fallen a long way behind inflation.</p> <p>In the 2023 Autumn Statement, the chancellor boosted the Planning Skills Delivery fund to £29 million. However, it is expected that more than this will be needed to clear the planning application backlog and to develop and maintain a highly skilled planning workforce required to decarbonise the power sector by 2035.</p>	<p>Adequately resource the planning system, from local authorities to ecological regulators and the Planning Inspectorate, to work through the backlog of projects waiting to be built. Engage with the planning sector during this process.</p>
<p>Deliver a rooftop solar revolution.</p>	<p>The UK has around 14GW of solar capacity, of which 5GW sits on English rooftops.⁹</p>	<p>Commit to a new target to ensure at least 40GW of the national target for 70GW solar by 2035 is delivered through</p>

	In November 2023 the government announced changes to permitted development rights, easing the process for individuals to install solar panels.	rooftop solar (on new builds, commercial buildings and car parks). ¹⁰
Improve household energy efficiency.	<p>Only around 40 per cent of the UK's housing stock is rated energy efficiency EPC C or above.¹¹</p> <p>It will take 67 years to meet the government's Great British Insulation scheme target to insulate 300,000 homes at the current rate of installation.¹²</p>	<p>Tackle skills and supply chain shortages to accelerate delivery of the Great British Insulation scheme.</p> <p>Improve data gathering of household energy use to inform energy demand management policies.</p> <p>Impose measures on the private rented sector to improve EPC ratings.</p>
Create a domestic supply chain to enable the energy transition such as driving investment for cabling factories.	<p>In Nov 2023, it was announced that XLCC would be the first UK factory manufacturing high voltage undersea cables in Ayrshire, Scotland; it will be in operation late 2027.</p> <p>The government has accepted the recommendations in the Electricity Networks Commissioner's report, on how transmission owners should establish</p>	The government must create a long term holistic plan for a UK supply chain, including raw materials like copper and aluminium for end products, like cables.

	long term relationships with providers.	
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These recommendations, taken together, are a holistic approach to reform the planning system and other relevant areas to speed up renewable energy and grid infrastructure development. It includes reform of governance principles and the required technical advancements so infrastructure is developed in a way that protects nature and builds public support for development. In doing so, it would address the many causes of delays both within and beyond the current planning system.

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Endnotes

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² HM Government, 2022, *British energy security strategy 2022*

³ Public First, 2023, *New polling on the UK public and local green energy development*

⁴ Natural England, 2023, *State of Nature*

⁵ *The Guardian*, 12 September 2023, ‘Ministers ignored Natural England’s advice on plans to rip up pollution laws’

⁶ Office for Environmental Protection, 30 August 2023, ‘Proposed changes to laws on developments will weaken environmental protections, warns OEP’

⁷ S Garthe, et al, 2023, ‘Large-scale effects of offshore wind farms on seabirds of high conservation concern’, *Scientific Reports*

⁸ Royal Town Planning Institute (RTPI), 6 November 2023, *State of the Profession 2023*

⁹ CPRE, May 2023, *Shout from the rooftops: delivering a common sense solar revolution.*

¹⁰ CPRE, 2023, op cit

¹¹ Department for Levelling Up, Housing and Communities, 15 December 2022, ‘English Housing Survey 2021 to 2022: headline report’

¹² *The Times*, 22 January 2023, ‘70 years to hit insulation scheme target’