Further to the Right Honourable Greg Clark, Secretary of State for Communities and Local Government's Written Statement (HCWS42) ("the statement") on the 18th June, 2015, on considerations for Wind Energy Developments.

DC21 being an active member of the wind development community would like to take this opportunity to respond to councils and others that have asked our view on the statement.

DC21, like Pendle and Rossendale Councils (see attached Appendix 1) believe that there is a question mark over the reasonableness with regards to the content of the statement.

The statement is purported to be the government implementing what they had already committed to in their Conservative manifesto prior to the general election. However, the Conservative manifesto stated they would *'halt the spread of subsidised onshore wind farms'*1.

The statement was about subsidies and not planning matters and in addition, the statement said *"wind energy development involving one or more wind turbines"* is a blanket statement for all wind turbines irrespective of the size or quantity. As the definitions we can find for 'wind farm' are in the dictionaries, such as The Oxford English Dictionary and Cambridge English Dictionary state "… group of energy-producing windmills or wind turbines…" it would appear that the statement goes beyond the manifesto statement.

It is DC21's belief, as it is with the above named councils, that planning is based on material consideration, which we endeavour to address during the planning application and appeals process.

DC21 is continually reviewing its engagement processes with the local communities. These include, letters and information leaflets to explain the project and the affects and mitigation strategies that are used to reduce the impacts to neighbours, email contacts for consultation responses prior to planning applications, which DC21 take into consideration and feed back to those responding.

DC21 would have grave concerns if the statement is taken in a very literal way.

Having to *'demonstrate that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing'* is in practical terms an unreasonably high bar to achieve. Given there is no provision stating what 'local communities' are and that we have to 'fully address' the 'planning impacts identified by affected communities' to their satisfaction to gain 'their backing'. How can DC21 determine if we have fully addressed all the planning impacts to gain backing.

Pragmatically any reasonable person who is involved or has been involved in any decision making of this nature understands that, as John Lydgate put it: *"You can please some of the people all of the time, you can please all of the people some of the time, but you can't please all of the people all of the time".*

The immediate effect of this commitment (i.e. the date of the issuing of the statement) has meant a considerable cost in submitting quality applications is now at potential risk if councils and appeals inspectors take anything other than a material view of the application as they have done prior to this statement.

Given that most councils appear not to have either Local Plans or Neighbourhood Plans in place with suitably identified areas for wind generation, it will be important that we, as responsible wind generation developers and councils work together to resolve this issue quickly and on that basis we offer to you our expertise in determining appropriate areas. In the meantime given that there is already mechanisms for dealing with wind applications that are not specifically within designated areas, DC21

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1 Conservative Manifesto 2015: Onshore wind now makes a meaningful contribution to our energy mix and has been part of the necessary increase in renewable capacity. Onshore windfarms often fail to win public support, however, and are unable by themselves to provide the firm capacity that a stable energy system requires. As a result, we will end any new public subsidy for them and change the law so that local people have the final say on windfarm applications.

asks that planning applications we submit continue as they have prior to the statement of the 18th. June, 2015.