



Community Power Solutions

# NESO Gate 2 Criteria Response

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Prepared by	Rowan Messer
Checked by	Charles Gamble

All queries should be directed to:

Dr Charles R Gamble

[charles.gamble@communitypowersolutions.co.uk](mailto:charles.gamble@communitypowersolutions.co.uk)

## Gate 2 Criteria

**Community Power Solutions Ltd (CPS) believe that community-led small scale onshore wind projects can play a key role in the energy transition, collectively making a 3GW contribution to the ambitious increase of onshore wind capacity proposed in the Clean Power 2030 Action Plan.**

These community-owned small scale projects often occupy marginal sites, and are overlooked by corporate developers. CPS's in-house research indicates there are thousands of potential small scale sites in the UK. By excluding these sites from the connection queue NESO are restricting the UK's energy sovereignty, the Net Zero and Clean Power 2030 targets, and the potential transformative impacts on communities.

CPS welcomes much needed reforms to the grid connection system, which has been a major roadblock for Net Zero and Clean Power 2030 objectives.

Despite this, the proposed changes would prevent community-owned and other smaller onshore wind developments from connecting to the grid due to burdensome costs arising from land rights acquisition and minimum acreage requirements. This goes against Clean Power 2030 objectives and the GB Energy Founding Statement, which clearly stress the importance of the role community energy has to play.

**CPS would argue that the NESO Letter of Authority (LoA) Gate 2 Criteria will exclude community small scale onshore wind projects from ever coming to market. We note three areas of concern.**

### **1. CMP446 Transmission Impact threshold**

**CPS welcomes NESO's intention to raise the Transmission Impact threshold from 1 MW to 5 MW registered capacity.**

CPS notes that for many marginal sites that 5 MW onshore community-led wind developments are difficult to make financially viable in the post Feed-in Tariff landscape. Community project developers are forced to increase turbine size, or add a technology mix such as solar and BESS, thus increasing the registered capacity significantly above 5MW.

**We seek confirmation that developments under an amended threshold are exempt from the Gate 2 Criteria.**

**We propose that for Community-led developments only, within the England and Wales Transmission Area that the TI threshold is further increased within the Small Power Station definition of 50MW.**

### **2. Submission of Planning Application & Securing Land Rights**

**NESO's requirement that developers demonstrate ownership of land or the rights to lease, or to have applied for planning consent to progress to Gate 2 puts community-led projects at a major disadvantage compared to corporate developers.**

Corporate developers have the balance sheet, funds and expertise required to purchase or lease land and arrange option agreements, involving expensive legal fees and financial incentives and compensation to landowners. These resources also enable those developers to fund extensive studies and to submit planning applications, which can involve hundreds of thousands of pounds in consultancy fees.

In contrast, community energy groups generally lack resources, requiring a succession of funding applications being awarded to enable progression. Securing a grid connection offer gives community

energy projects weight, allowing for more funding to be secured; funding bodies look favourably on projects having a grid connection - a Catch 22 situation.

Unable to meet the land acquisition or planning application requirements, community energy projects would struggle to progress. The result would be that community energy falls behind or fails entirely. This would result in the loss of transformative funding to communities in the UK, the loss of the significant contribution community energy can and should make to Net Zero and Clean Power 2030 objectives, and hundreds of MW sites lying fallow.

**The pre-requisites of land ownership / lease or planning application will make securing grid connection offers unaffordable for many community-led projects and organisations.**

### **3. Minimum Acreage Requirements**

**The current minimum acreage requirements as applied to community-scale onshore wind are incorrect by a factor of 10 and create an insuperable barrier for Community - led projects.**

The Energy Density Table in “Section 7. Minimum Acreage Requirements” of NESO’s “Guidance: Letter of Authority for Onshore Transmission Connection Applications” sets out a minimum of 7.68 acres/MW for onshore wind – nearly four times the requirement for solar and hundreds of times the requirement for many other technologies. This is simply incorrect, as a typical 5MW turbine could require a redline area of less than 4 acres<sup>1</sup>, not 38.4 acres if the above minimum is applied. By contrast a 5MW solar farm requires 25 acres<sup>2</sup>.

Local Planning Authorities impose a charge on the redline area. The NESO guidance minimum charge for a 5MW turbine would be around £50,000, whereas the correct charge would be £5,000. Furthermore, the minimum acreage requirements will force developers to lease larger areas of land for the same number of turbines, significantly increasing costs.

**Increases in costs of this magnitude could make community energy projects unviable.**

### **4. Our Recommendations**

**Developments under the proposed 5 MW lower Transmission Impact threshold should be exempt from Gate 2 Criteria** (we understand in light of our call with Martin Cahill and Alex Markham that this will be the case).

**The TI threshold be increased within the definition of Small Power Station.**

**Community-led energy projects should not require proof of land rights for Gate 2.**

**Community-led energy projects should not require submission of planning application for Gate 2.**

**The minimum acreage requirement for onshore wind should be corrected to 1 acre/MW**

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<sup>1</sup> See the following applications for wind turbines in Avonmouth, Bristol.

[23/04044/COND](#)

[08/04925/F](#)

[17/02240/F](#)

<sup>2</sup> <https://www.renewableenergyhub.co.uk/blog/everything-you-need-to-know-about-solar-farm-requirements>