

Permitted development rights for onshore wind turbines in England

Introduction

Historic England is the government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for. Historic England welcomes the opportunity to respond to this consultation on the introduction of permitted development rights (PDRs) for onshore wind turbines in non-domestic settings.¹ We have limited responses to questions we consider have the highest relevance to safeguards for the historic environment.

Summary

Historic England strongly supports the policy objective of securing greater energy resilience and security. However, the introduction of any permitted development right (PDR) carries risk, and sustainable rollout of energy infrastructure can be effectively secured through the planning process, supported by streamlining measures such as Local Development Orders. In terms of these specific PDR proposals, the range of historic environment safeguards, such as exclusions for designated heritage assets, are welcomed. However, the proposed safeguards do not address potential impact on buried archaeological remains, nor do they adequately consider the impact(s) of large turbines on the significance of heritage assets through development within their settings. If these PDRs are introduced, these aspects should be addressed through prior approval matters.

Questions

Eligible contexts

1a. Do you agree that a new PDR should be introduced for a wind turbine in non-domestic settings?

Unsure

1b. Please explain your answer.

The introduction of any new permitted development right carries risks as it reduces capacity for the local planning authority to consider context-specific factors and effectively balance social, economic and environmental matters. By their nature they introduce a blanket approach. The landscape impacts of wind turbines, as well as associated measures such as bunds or other screening, can vary significantly linked with topography and openness; heritage impacts also

¹ Department for Energy Security & Net Zero (2026) [Open Consultation: Permitted development rights for onshore wind turbines in England](#)

vary, dependent on the location and significance of affected assets - including the contribution setting makes to significance and features such as designed views.

Historic England strongly supports the policy objective of securing energy resilience as well as, more broadly, providing as much clarity as possible to owners, applicants etc. in the rollout of this type of infrastructure. This can be achieved, however, through the planning system in pursuit of truly sustainable growth. Assessment of the capacity of any given place to accommodate turbines can inform local plan policies, supported by measures such as Local Development Orders, which achieve the same outcome whilst enabling consideration of local context and balancing of sustainability goals.

Size limits

3a. Do you agree with a maximum 30 metre tip height for the non-domestic wind turbine?

Unsure

3b. Please explain your answer.

This represents a very large addition to a typical street, townscape or landscape, double the size of the existing domestic PDR for wind turbines. The range of exemptions for designated heritage assets is noted and welcomed. However, the scale of these additions may have a particular impact on the significance of these assets through development in their setting(s). Setting is not adequately dealt with through the current safeguards, and recommendations are outlined in questions 6a and 6b.

3c. Do you agree with a maximum rotor swept area of 200m²?

Unsure

3d. Please explain your answer.

This represents a very large addition to a typical street, townscape or landscape. The range of exemptions for designated heritage assets is noted and welcomed. However, the scale of these additions may have a particular impact on the significance of these assets through development in their setting(s). Setting is not adequately dealt with through the current safeguards, and recommendations are outlined in questions 6a and 6b.

Excluded sites

5a. Do you agree with the proposed list of areas where the PDR will not apply?

Yes. The list proposes to exclude all designated heritage assets, including area and landscape-based assets such as registered parks and gardens and registered battlefields, which is welcomed.

5b. *What, if anything, would you change about the proposed list of excluded areas?*

World Heritage Site Buffer Zones

The exclusion of World Heritage Sites, as part of Article 2(3) Land, is welcomed. However, Historic England would advise that this should also extend to any World Heritage Site buffer zone. These are an important component within the protection system for World Heritage Sites to address important views and other areas or attributes that are functionally important as a support to the World Heritage Site, with complementary restrictions on their use and development. Their addition to the proposed PDR would not have a burdensome impact on implementation of this PDR nationally. Just under half (8/20) of the English World Heritage Sites have a buffer zone – as such, the land impacted is comparatively small. They are also unambiguous spatial extents shown on a map – freely accessible on the National Heritage List for England, where information can be downloaded / automatically used by other mapping tools. As such, they are easily identified by non-expert users.

Archaeological Remains

The exclusions outlined in the consultation, and associated examples, relate principally to the visual impacts of installations. Whilst this is one of the primary considerations, it does not address potential implications for buried archaeological remains through, for example, piling, foundations and associated cabling and other infrastructure. Many archaeological sites are unscheduled (and thus not subject to the separate scheduled monument consent) but are nonetheless of national importance. The National Planning Policy Framework establishes that these should be subject to the same tests as scheduled monuments. As such, Historic England would advise that consideration should be given to the impact on archaeological remains as part of the prior approval process.

Additional siting conditions

6a. *Do you agree with the proposed additional condition to minimise visual impact on nearby heritage sites and important landscapes?*

Yes

6b. *Please explain your answer.*

Setting

The setting of a heritage asset is the surroundings in which it is experienced. It is also different to curtilage, which can for example be very small and concentrated in the asset's immediate environs. As such, potential impacts on the significance of heritage assets would not be addressed solely by excluding the asset (and the curtilage of a listed building) itself from the right. Views, and visibility, to and from an asset can be a critical contributor to the significance of a heritage asset. Furthermore, Historic England's Good Practice Note on setting is clear that

a range of factors can contribute to the setting of a heritage asset.² For example, noise from turbines may harm the tranquillity associated with a historic churchyard or park. As such, to ensure appropriate oversight and to provide some capacity for the local authority to address all aspects of setting, Historic England would advise that the impact on heritage be added as a prior approval matter.

Terminology

In terms of specific language in the consultation, the language of the National Planning Policy Framework should be used, rather than ‘heritage site’ and ‘important landscape’, to avoid confusion. Furthermore, in referring to additional siting considerations for heritage sites, the consultation refers to ‘taking into account the nature and purpose of the site’. It is unclear whether this refers to the heritage site, or proposed turbine site. Similarly, it would be beneficial also to consider the characteristics of the site more holistically e.g. topography, openness, etc.

Prior approval

11a. Do you agree with including prior approval in respect of siting, impact of the development on the amenity of the area, and land contamination risks?

Yes

11b. Please explain your answer.

Whilst the listed prior approval matters are logical, they do not provide adequate safeguards for heritage. Consideration should be given to introducing ‘heritage, including archaeological remains’ as a prior approval matter. Whilst the list of exclusions for heritage is comprehensive, they do not in themselves address all archaeological considerations (including for example unscheduled remains that may nonetheless be of national importance), or all elements within the setting of an asset that are likely to contribute to its significance, as these often extend beyond the designated boundary and are not confined to visual impacts; for example, a range of environmental factors such as noise can impact the contribution setting makes to an asset’s significance. As an example, Part 20 Class ZA of the General Permitted Development Order, concerning demolition and construction of dwellings, includes ‘the impact of the development on heritage and archaeology’ as a prior approval matter.³

Environmental Impact Assessment

13. Do you have any comments on the relationship between EIAs and PDRs for small-scale, non-domestic wind turbine installations?

Any change to the relationship between EIAs and PDRs in this context must account for the fact that the EIA process provides critical oversight of areas such as buried archaeological

² Historic England (2017) [The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 \(Second Edition\)](#)

³ General Permitted Development Order *Part 20 Class ZA – [Demolition of buildings and construction of new dwellinghouses in their place](#)*

remains, significant effects related to heritage assets and visual impacts on a landscape, which the proposed PDR does not.

Existing permitted development rights

14a. Do you think government should make changes to existing PDRs for small-scale turbines in domestic settings?

Yes

14b. Please explain your answer. If you have said yes, please include changes you think government should make.

The safeguards associated with the existing domestic PDR should be retained and could usefully be strengthened to refer to archaeological considerations as part of prior approval for ground-based turbines.

Conclusion

Overall, energy resilience and the rollout of energy infrastructure as a policy objective is critical and supported. The planning process enables this to be done in a sustainable way, balancing interdependent environmental goals, accepting that the impact of this infrastructure is highly context dependant. If a permitted development right is introduced, it must consider all potential impacts on the historic environment. The current proposal does not address buried archaeological remains, nor does it given sufficient strength to safeguards around the contribution of setting to the significance of heritage assets. Building on the existing proposal, the gaps could be filled by introducing a prior approval matter for heritage, including archaeology.

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