

Energy Security and Net Zero Committee

Oral evidence: [National planning for energy infrastructure](#), HC 868

Wednesday 21 May 2025

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Members present: Bill Esterson (Chair); Ms Polly Billington; Melanie Onn; Torcuil Crichton; Wera Hobhouse; Luke Murphy; Claire Young.

Questions 85 - 176

Witnesses

[I](#): Lawrence Slade FEI, Chief Executive, Energy Networks Association; Charlotte Mitchell, Chief Planning Officer, National Grid Electricity Transmission; Julian Leslie CEng FIET, Director, Strategic Energy Planning, and Chief Engineer, National Energy System Operator (NESO).

[II](#): Chandni Ruparelia, Chief Operating Officer, Island Green Power; Charles Wood, Deputy Director, Policy (Systems), Energy UK; Eleri Wilce, Head of Offshore Consents UK & Ireland, RWE Renewables.

Examination of witnesses

Witnesses: Lawrence Slade, Charlotte Mitchell and Julian Leslie.

Q85 **Chair:** Welcome to this afternoon's session of the Energy Security and Net Zero Select Committee, looking at the national policy statements and continuing the work that we started this morning. Welcome to our first panel. Could you introduce yourselves, please?

Julian Leslie: Good afternoon. I am Julian Leslie. I am director of strategic energy planning and the chief engineer for the National Energy System Operator, or NESO.

Charlotte Mitchell: Good afternoon. I am Charlotte Mitchell. I am the chief planning officer for National Grid, representing the National Grid electricity transmission part of the business.

Lawrence Slade: I am Lawrence Slade, chief executive of the Energy Network Association, here today to look at distribution network operator issues.

Q86 **Chair:** The Government's update to the national policy statements endorse various aspects of the centralised strategic network plan. As closely as you can, what exactly is it that should be endorsed in the plan?

Julian Leslie: The centralised strategic network plan is building upon our network design and planning process that we have run for a number of years, but it has really taken it to the next level. It is going to be based on a strategic spatial energy plan, which is going to be the item that will be endorsed by Government. That sets out the high-level direction of what the energy infrastructure needs to look like for Britain.

Following that, we create the centralised strategic network plan, which then takes that broad, high-level strategic national plan and breaks it down into the assets and infrastructure that are required in order to move the energy around the system.

At that point, to deliver that Government-approved plan, the SSEP, the CSNPs and the network plan that then delivers that, it will then be left to Charlotte and her colleagues to take that plan and do the on-the-ground delivery and consenting of it.

Charlotte Mitchell: I completely agree with what Julian set out there. It is very important that the CSNP is endorsed in the NPS, which the current draft suggests that it will be, because, as Julian has outlined, that will settle the need case for the proposals that are identified as being needed through the planning exercise that will be undertaken to develop the CSNP, and it will also settle the strategic option.

We often spend time looking at whether it is more appropriate for infrastructure to be located offshore via subsea cables or onshore via overhead lines or underground cabling. The CSNP will address those



issues at a holistic, strategic level, which will then be developed in more detail, as Julian said, by transmission owners when we develop the detailed design, so that is appropriate.

The CSNP is at a very early stage of development right now. The methodology for how it will be developed is yet to be confirmed. That is the next step. It would be appropriate for there to be a mechanism by which Government can have a view of the final form of the CSNP before it is fully endorsed in the NPS, but the intention for the NPS to endorse the CSNP is absolutely the right thing, which we support.

Q87 Chair: The guidance in the NPS states that the final proposed route for infrastructure should be within the strategic parameters defined in the CSNP. Apologies to anybody watching who has already lost track of what we mean by these acronyms. Julian, can you explain what you take that to mean?

Julian Leslie: Just to take a moment, NESO being so new, I launched into the last question without recognising what NESO is. NESO is the National Energy System Operator. We were created in the Energy Act 2023, recognising the scale and pace and unprecedented investment that is required in the energy networks, and the fact that the energy networks prior to this were developed independently, whereas NESO is the opportunity to bring a whole system view to this.

In terms of what the CSNP would look like, there are a lot of options. We set out the need in the strategic spatial energy plan, so the need of the system is detailed through that. We work with our colleagues across the transmission owners, bringing forward options—the underground, the subsea, the overhead line, or one particular route corridor versus another.

We then run through an assessment process that looks at the costs, the environmental impact, the community impact and deliverability. We run through a process that we have consulted upon as to how we make those decisions. Ultimately, before the decision is finally signed off, it will go through a strategic environmental assessment and habitat regulation assessment, so it goes out for that consultation.

At the end of all of that process, the needs case is very clear, the optioneering has been done and, therefore, the selection of the final solution is very clear. It is then handed back to the transmission owners at that point to go ahead and do the detailed design and consenting of that asset.

Q88 Chair: That sounded like a very complex set of strategic parameters. Is that a fair comment?

Julian Leslie: It is complex, but we have some of the world's experts leading on this. As I say, it is not a brand new process. It is building on the experience that we have gained over the last 10 years or so as to



how we develop electricity infrastructure in GB, and bringing that all together into one place.

Q89 **Chair:** Charlotte and Lawrence, do you have anything different to say?

Charlotte Mitchell: Julian has outlined it well. For us, it is important that those strategic parameters that deal with the most appropriate technology types—for example, that choice around offshore versus onshore, or overhead line versus underground—are addressed at that holistic plan-making stage. We really welcome that, because it is important that we move to a strategic spatial approach to where energy infrastructure is located.

Lawrence Slade: Just to very quickly add to that, although distribution networks are not a direct focus of the CSNP, the clarity that they bring, which Julian and Charlotte have mentioned, is greatly welcomed. Given the scale of investment that needs to be raised across transmission distribution, that clarity is very important in terms of providing investor confidence across the whole sector.

Q90 **Chair:** This is going to be set strategically and centrally at a high level. How will you ensure public confidence in decisions that are taken? In particular, how will you engage with communities that are going to be hosting the infrastructure?

Julian Leslie: We are unique in the fact that even the process by which we make the decisions is being consulted upon. In December of last year, we set out a consultation on the strategic spatial energy plan. Normally, we would get three or four organisations responding. We had over 150 organisations responding to that consultation, making over 900 individual points to enhance and improve the methodology by which we will be carrying out the SSEP. That methodology was approved by DESNZ, Government and the regulator just last week, so we now have a very clear, consulted upon process by which we will use, gather and process information, such that we can make the decisions.

As we go through the process, we also have lots of engagement groups with consumer and environmental representatives, as well as industry, and really strong governance with Government, Ofgem, industry and community representatives being part of that. That means that, by the time we get to producing the pathways by the end of this year and presenting that to Government and the Secretary of State, once a decision has been made as to which one or more of those pathways to take forward, we have then built in a 10-month engagement and consultation process on the final SSEP.

When we look to the CSNP, we are replicating that same process. As Charlotte says, we are at the stage now where we have already consulted on the high-level principles of the CSNP. We are going to consult this summer in more detail as to the methodology that we will follow. There will then be opportunities to engage and to shape the outcome of the CSNP as we continue through the process.



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Q91 **Chair:** I have experienced so-called engagement from developers in my constituency over the years, and very few people are even vaguely aware that anything is going on, and are generally pretty unsettled by what they find out, when they eventually understand that something is happening. Do you agree that it is important that we do not end up in that situation? You mentioned 900 organisations, but that is not very many people in the scheme of things. Is there something that you can do to improve the level of engagement and build public confidence?

Julian Leslie: In terms of the people who we engage with, it is just over 150 respondents with 900 points of clarification or changes to be made, and we are reaching far and wide.

Chair: That is even fewer.

Julian Leslie: We could not engage with 60 million people in the nation, but we can engage with their representatives such as Citizens Advice, environmental groups and local community groups that are part and parcel of that process. We are reaching as far and wide as we can. We host webinars for people to join, and we publish all of our information in a very transparent and open way.

Q92 **Chair:** So you do not go directly to individuals.

Julian Leslie: No. This is a national plan on a national basis. We are not the ones picking specific projects in the SSEP. We are breaking the country into 15 to 20 zones or regions, and working out what the right energy mix is for the nation, taking into account, in each of those zones, the environmental, community and geographical constraints that sit within them.

Q93 **Chair:** What about the role of planning decision-makers? Should they still have discretion to consider alternative routes? We heard quite a lot about this this morning in one of our sessions. The reason for potentially advocating for alternative routes is because of environmental and community concerns.

Julian Leslie: The SSEP and CSNP will do the high-level optioneering that makes the big, bold choices around offshore versus onshore, or overground versus underground, for the route length of the asset that is under discussion. When it gets on to the ground and the detail, and that is when—

Charlotte Mitchell: It comes my way. It is important that those strategic parameters that Julian was talking about—for example, offshore versus onshore—are settled at that high-level plan-making stage in the CSNP, but that does leave a lot of room for manoeuvre within those broad parameters. It is right that we take that on and, at that point, we engage communities in the detailed design of the proposals around routing and siting of the projects, so that there is a further opportunity for communities to influence those proposals, which is really important.



We get a lot of value out of the engagement that we do with communities and with environmental and other stakeholders at that detailed design stage, but I do think, to get the benefit of the CSNP and the work that is done at that strategic planning level, which is underpinned, as Julian said, by a strategic environmental assessment and a habitat regulation assessment, it is important that the outcomes of the CSNP are endorsed and reinforced via planning policy—in this case, through the NPS endorsement.

- Q94 **Luke Murphy:** Thank you to our witnesses for coming today. The strategic spatial energy plan marks a shift away from the market-based energy system. Would you agree?

Julian Leslie: Yes.

- Q95 **Luke Murphy:** In that case, how is it not contradictory, given that the national policy statements maintain a commitment to a market-based energy system? How is that to be reconciled?

Julian Leslie: In terms of what we have seen in the market to date, I am sure that many of you have heard about the challenge of connections and the fact that we are now going through connection reform. That was because the queue to connect was seven or eight times over subscription. With that process in place, it is very hard for our colleagues in the transmission owners and at the distribution level to determine what projects, first, are needed on a national basis, and, secondly, are commercially viable.

What we can do through the SSEP, as we have seen through the Government's clean power action plan, is to give that clarity to the market from a network point of view, so that they know what to build, where to build and when to build it, and also to size the market appropriately so that solar and battery developers know the scale and the size of the market that is available to them. When it all comes together, it leads to a secure, reliable, efficient and low-carbon system.

If we left it to its own, we would have 70 gigawatts of batteries on the system, which is unbalanced. We do not need 70 gigawatts of batteries, which is what is in the queue for 2030. We need 23,000 to 25,000 megawatts of batteries. It is about putting the bounds around that to give that clarity to the investors and to industry. As we build the strategic spatial energy plan, that long-term view, looking out to 2050 and the options, and working backwards around what decisions need to be made today in order to get to where you are heading, allows investors to think about a homegrown supply chain, and about the skills, development and economic growth within Britain.

- Q96 **Luke Murphy:** On the first panel that we had today, there was a bit of disagreement between our witnesses about how detailed the strategic spatial energy plans will be. How detailed and specific will they be place by place?



Julian Leslie: We are still working through the finer details of it, but it is going to be these 15 to 20 regional zones across Britain. Within each zone, we shall say, "This zone is good for 10 gigawatts of offshore wind. This zone is good for 500 megawatts of onshore solar", et cetera. It will not be specific, by any means, because that is not our role. It is the market's role. Once we build the network with the transmission owners to fix all these boundaries together through the CSNP, it is really left to the market to say, "Is it this field or that field, or the top of that hill or that valley, that gets developed?"

Q97 **Luke Murphy:** What would happen if there is a proposed development that is outside the optimal areas or above the capacity limit identified for a particular one of those zones?

Julian Leslie: There is nothing to stop a developer bringing that forward as a proposition. As you may know, in the connection reform, there are two criteria that get you a connection agreement. One is, "Are you ready? Do you have land and other things in place in order to give surety that you are a real project ready to go?" The second is, "Are you needed?" At the moment, the need is assessed in the clean power action plan to 2030, and then out to 2035.

As we look to go to the future, our expectation is that the SSEP will provide that need. Again, projects will come in and come out, and it is about constant monitoring. There may be a new project that is currently not foreseen, but maybe another one has fallen away. Therefore, we will be able to trade and make sure that the capacities are still the same.

Q98 **Luke Murphy:** Is it too early for the national policy statement to reference the strategic spatial energy plan before it is even completed? An earlier witness thought that the reference should be removed.

Julian Leslie: No. The strategic spatial energy plan needs to have some bearing, otherwise it is a paper exercise and it will sit on a shelf and gather dust. Having it in the NPS means that, when those planning decisions are made, the strategic spatial energy plan and the CSNP should be taken into account and factored in. It is not predetermining any outcome or any decision. It is saying that there is this process that has been gone through, which has led to the SSEP and the CSNP. The reference in the NPS is hugely welcomed, because it gives the plan that we will create with the transmission owners and others some real standing.

Charlotte Mitchell: If I could come in on that, the updated draft of the NPS refers to the SSEP and seeks to endorse the future version of the CSNP as well. I would suggest that, again, given that these plans do not yet exist, as you rightly point out, it would be appropriate for there to be a mechanism to see the final form of the plan before they are fully endorsed within the NPS. The Planning and Infrastructure Bill is bringing forward a measure that will allow more agile updates to the NPSs, so that might be the most appropriate mechanism by which you could see the



final version of the SSEP and the CSNP before updating the NPS to give weight to those documents.

Q99 Luke Murphy: Moving the conversation on to network upgrades, what will the combined effect be of the presumption of consent for critical national priority projects and the endorsement of the centralised strategic network plan? What is going to be the effect of that presumption of consent?

Julian Leslie: As you may remember, Nick Winser, the transmission commissioner, was commissioned to look at how to accelerate the deployment of infrastructure in Britain. Currently, it takes 12 to 14 years to build a new overhead line or new infrastructure of this scale. The challenge was to get that down to seven to eight years. Part of that outcome was to create these strategic energy plans and to give that certainty.

The transparency that we spoke of earlier around the optioneering, the big strategic decisions to be made, bringing all that up front and making sure that it is clear, transparent and consulted upon, takes out four or five years at the front end of the planning process that Charlotte and her colleagues currently have to go through, and just really speeds up the deployment of the infrastructure.

Charlotte Mitchell: On the question of the combination of the CSNP and the critical national priority status, the CNP status that you are speaking about was introduced in the last update of the NPSs. It is very helpful for our transmission projects, which receive critical national priority status. As you rightly point out, that provides a presumption of consent for those projects. In practice, what will happen is that the CSNP will benefit from endorsement in the NPS. As we have talked about, that will settle the need case and the right broad strategic location for the infrastructure. That infrastructure will then receive critical national priority status.

It is a very strong starting point for those projects, but that is not to say that those projects would then not have to, of course, adhere to all of the other policies in the NPS, of which there are many around, for example, environmental protections. They would also, of course, have to be subject to engagement with stakeholders and communities, and so those matters would absolutely still need to be considered—and it is right that they are—on a scheme-by-scheme basis through the detailed design process.

Lawrence Slade: I will agree with all of the positive comments around this whole process. It all makes perfect sense, as Nick Winser's report said, in terms of speeding things up. The point that I would make that would cover both distribution and transmission, though, is that we can carry out all of these reforms and bring in all of these aspects, but unless we also look at the issues around land rights, wayleaves and granting access, et cetera, for either new or existing infrastructure, a lot of the delays that we are already dealing with are going to remain.



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As an example of how this compares to other utility services, the process for obtaining planning and consenting in water and telecoms is a maximum of six months, whereas, across electricity, it is typically up to three years. There is a significant differential that electricity networks have to look at, and this is before you even get into the planning regime. That causes delay and can also cause quite significant cost issues.

Q100 Luke Murphy: Are you saying that the streamlining has not gone far enough?

Lawrence Slade: It has not gone far enough in that respect, yes.

Charlotte Mitchell: Certainly, around land rights, it is important to look again, because, to some degree, the planning system operates separately from land acquisition and land rights. I would absolutely support Lawrence's points around needing to look again at land rights and land acquisition.

Q101 Luke Murphy: We heard from the RSPB, which has given us written evidence. It said that the CMP policy could lead developers to override environmental concerns and result in the environmental impacts of developments not receiving enough scrutiny. How do you respond to that?

Charlotte Mitchell: Reducing impacts on wildlife and habitats is really central to the way in which we develop our projects. The NPS is very clear about assessment principles—for example, that you need to take into account when developing a project what you should assess—and suggests potential mitigations that can help to reduce those impacts. On our projects, we always look to avoid environmental impacts where we can and, where we cannot, to minimise and then mitigate them. The wording in the NPS goes far enough at the moment to ensure that the right environmental protections are in place.

On the question of birds specifically, the wording in the NPS is quite strong around bird strike at the moment, and it has wording for applicants to consider mitigation, such as routing overhead lines to avoid well-established bird flight corridors, and including equipment such as diverters on overhead lines. We absolutely take into account the impacts on birds, as well as all species, when we are developing our projects, and the NPS hits the right note on environmental protections.

Q102 Luke Murphy: We have been told that the introduction of the critical national priority status has lowered the threshold for developers to gain planning consent. Would you dispute that?

Charlotte Mitchell: As I said, we undertake the same environmental impact assessments that we did before the critical national priority policy was introduced. We continue to do extensive surveys of, for example, habitats to really understand the areas that we are working in. We continue to seek to avoid, minimise and mitigate our impacts as far as possible when we are developing up these projects. We work closely with



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environmental stakeholders as well, RSPB being one, to ensure that we understand their concerns and respond to those where possible. I think that it is the right level of protection.

Q103 Luke Murphy: In terms of impacts on irreplaceable habitat that cannot be mitigated or avoided, could there now be scenarios where the infrastructure could go ahead because the need and the public interest is so overwhelming?

Charlotte Mitchell: The planning balance has to deal with these questions around weighing up the need for the projects against the potential impacts that they can bring forward. It is a very important point that we look very seriously at irreplaceable habitat in comparison to alternative options at that early stage and whether the infrastructure can be located elsewhere to avoid irreplaceable habitats.

Q104 Chair: In the end, if the country needs the energy supply, what will happen?

Charlotte Mitchell: It is a matter of planning balance, is it not? In the end, if it is deemed that the infrastructure is so needed to support the energy requirements around security of supply and resilience, it is important that we deliver those projects, having regard, of course, to environmental impacts as far as we are able to.

Q105 Torcuil Crichton: I have a quick supplementary on the point that you made, Lawrence, about taking three years to get to the start line but only six months for other utilities. What is the problem?

Lawrence Slade: It is just that the reforms and the structure have not been updated for many years and not kept pace with where we are in the industry. Updating the whole legislation around it will speed things up. We have detailed this in a nine-point planning reform plan that we have been working on for two years, which gives more background to it. We have shared that with colleagues at DESNZ and more widely, and I would be more than happy to share the details of it with the Committee afterwards.

Q106 Torcuil Crichton: You mentioned that land access was a problem. Is it about permission from landlords?

Lawrence Slade: It is across the whole remit.

Torcuil Crichton: That is interesting. Thank you.

Q107 Wera Hobhouse: Never mind the environmental impacts, what people also often get very worried about is the visual impact of the landscape transformation. Some time ago, there were academics who were working on landscape transformation and how you can visually mitigate some impact. Do you talk to these guys? I have some contacts that I am happy to pass on, but it is important that all of that is taken into consideration, because the landscape transformation will be quite significant. The visual transformation also needs to be mitigated against. Do you consult with



anybody about that?

Charlotte Mitchell: I should say that, when I say “environmental impacts”, I am considering landscape and visual impact to be part of that wider environmental impact picture. It is absolutely something that we think a lot about and consider. One aspect of that is dealt with through the Holford and Horlock rules, which set out guidance around routing and siting infrastructure so that you can minimise and avoid those effects that you are talking about, where you can. The Holford and Horlock rules are recognised in the existing NPS, and we are very pleased to see that reference rolled forward into this update to the NPS, because those are very important rules.

In terms of engagement, I would absolutely welcome your contacts, if you have some that you would like to pass along, so that we can consider how we best develop our projects. It is something that we talk to communities a lot about, and we hear concerns around visual impact, so we certainly look to find that right balance in terms of developing the detailed designs for our projects, considering visual impact as well.

Q108 **Claire Young:** Julian, you seemed to suggest earlier that it was not possible for you to communicate with the whole of the public, but, in producing the electricity transmission design principles, how will you ensure that there is close engagement with the communities who will host these transmission projects, so that the rules do not just appear technocratic and distanced from them?

Julian Leslie: The electricity design principles are something that we are working on as we speak, again coming out of the transmission commissioner’s actions, so we have been instructed to do this. There is huge value in creating those guidelines and the principles by which the network owners can then proceed.

We are just going through the fine detail now. We are going to consult extensively again over the summer on that, so people will have the opportunity to engage and to understand, “What are the decisions? How do you make the trade-off between underground versus underground?” It is a very factual, evidence-based approach.

Just over a year ago, we published an independent report from DNV, which talked about the different technologies and the pros and the cons in terms of cost of maintenance, environmental impact and a whole range of facets. Two or three weeks ago, the Institute of Engineering and Technology published an updated report along similar lines, with updated costs and the knowledge that we have today on those new technologies.

What we are trying to do with the ETDP is bring all that stuff together and just help communities, stakeholders and the transmission owners to understand that the starting principle would be underground versus overhead line in this condition. The detail, though, is when Charlotte and her colleagues will come in and say, “That was the guiding principle, but,



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when you are on the ground in that community and that environment, there are changes to be made around all of that". The ETDP is not determining the final outcome. It is giving that transparency and clarity on the guidance that is required to help the projects proceed.

Q109 Claire Young: How will the EDP interact with existing guidance on overhead lines? Does that not need to be explained in the national policy statements as well?

Julian Leslie: The ETDP is important because it sets out those guiding principles. The final planning decision is going to be made by the planning people locally or nationally, depending on the scale of the project. What the ETDP is doing in conjunction with the centralised strategic network plan and the SSEP is just another facet that helps to bring the transparency and clarity about why and how those decisions are made.

Charlotte Mitchell: As I understand it, the ETDP will deal largely with engineering and technology choice-type questions. There is then another set of guidelines, which I spoke about a moment ago, called the Holford and Horlock rules, which are also referred to in the NPS. It is very helpful that the NPS has distinguished between the two. The updated drafting recognises the ETDP as separate to Holford and Horlock, which tend to deal with routing and siting of infrastructure, so there is a distinction there, if that is helpful.

Q110 Claire Young: So you do not expect there to be any conflict between the two.

Charlotte Mitchell: I do not expect there to be conflict, and it is right that the NPS drafting that we have seen looks to recognise the ETDP and also reinstate the reference to the Holford and Horlock rules.

Q111 Claire Young: Julian, is it not premature for the national policy statements to endorse the principles at this stage, when they have not yet been put to public consultation?

Julian Leslie: It is set in the direction of travel. The governance and the process that we will go through to get the ETDP approved is going to be extensive. Therefore, by the time they are approved, that process would have been gone through. As Charlotte said earlier, it is about whether there is an opportunity to take a pause once we know what the detail is and having followed the consultation, but it is right that the ETDP is referenced in the NPS.

Charlotte Mitchell: The current draft in the NPS suggests that developers should have regard to the ETDP. Of course, as you rightly point out, before there are ETDPs, we could not have regard to them, could we? There needs to be some staging of this or some process to ensure that the ETDPs are in their final form before developers are expected to have regard to them.

Q112 Claire Young: Lawrence, the draft update says that the principles will



not apply to projects that have already been through the strategic front-end design phase. Would a better transitional approach not be to apply them to all projects as much as is possible?

Lawrence Slade: That probably plays to the difference between distribution and transmission projects, and those that are deemed to be of strategic national importance, which is not the majority of distribution projects. One of our concerns is in a band between distribution and transmission, particularly affecting 132 kV lines, which can sometimes be on wooden as well as steel poles, whereby it would be much better if, for example, those lines were captured totally under section 37 of the Electricity Act, as opposed to under these as well. They should be taken out, which would give more freedom and speed to act in terms of delivering those networks where we know that there is going to be a much greater demand of distribution for that level of line.

Charlotte Mitchell: It is important that we think about the transitional arrangements for introducing ETDP. As Julian has spoken about, it is right that developers should have regard to these design principles. They will be a starting point for designs. The principles need to be that starting point from which we can take a detailed view, given the context of a particular project, as to how they are applied under the particular circumstances there.

The intention for the ETDP is that they will accelerate projects, and so the transitional arrangements should be developed with that in mind. The intention is not to take well-developed projects and restart the design process, but rather to pick up new projects coming online and ensure that they are developed in a consistent way.

Q113 **Ms Billington:** Apologies for my lateness. I am interested in this idea of the ETDPs. For full transparency, I have a National Grid project possibly happening in my constituency. What raised a lot of concerns for constituents were not just the most immediate ones, but the general principles, which is what is interesting about the ETDPs overall. At the moment, it is carrying on without these principles. Those transitional arrangements are important. They do not happen to be about overhead pylons but about cables and the impact on nature as well as the visual amenity.

How much will these ETDPs factor in those concerns and ensure that, when we are transforming our electricity grid, we are doing it in a way that is the most efficient and effective way possible not only for the people who are investing in it, but also for the people who will end up with that stuff in their communities?

Charlotte Mitchell: I might start, but I imagine that Julian might want to comment on this as well. NESO is holding the pen on the electricity transmission design principles. We have been speaking about the intention to consult on those, because, as you rightly point out, that is a very important part of this process. If we are going to develop a set of



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design principles that create the starting point for the right type of infrastructure under particular circumstances, it is right that we involve communities and stakeholders in that discussion.

That is yet to come. We do not yet know what the final form of the design principles will be, so some of those questions need to be worked through as the design principles are developed. There is a significant opportunity here for the design principles to create further clarity for communities about what they should expect when they will be hosting the infrastructure that you are talking about.

Q114 Ms Billington: Clarity is interesting and useful. We are probably agreed that the current planning system is not working for anyone. We know that we already have damage to our nature from previous projects that National Grid has done, and so what has been happening in the past has clearly not worked. How would you see the electricity transmission design principles improve things, for communities and overall, in terms of the protection of our nature when we are introducing these infrastructure projects?

Charlotte Mitchell: Given that we are at the early stage of developing the design principles, it is hard to comment on the specifics of their content, but the intention to consult on them is really the opportunity to hear those voices from communities and stakeholders in terms of finding the right starting point for engineering and technology choices in particular landscapes and environments, and under particular circumstances. It is a conversation that we need to have through the development of the design principles, and it is very important that we get the right inputs to find the starting point that is most appropriate.

Q115 Ms Billington: We need the principles to be better than what has happened in the past.

Charlotte Mitchell: We do not have design principles at the moment that are recognised in the national policy statement. Where the opportunity lies is that these principles will have a new status that the NPS currently does not provide.

Q116 Ms Billington: Julian, is this likely to slow down the ability of NESO's overall plan to hit that 2030 target?

Julian Leslie: A lot of the projects that we need for 2030 are already under way and, therefore, would not be impacted by the ETDPs.

Q117 Ms Billington: The one that I am talking about is supposed to finish in December 2030 as part of the 2030 target. Knowing what British project management is like, what are the chances of that happening?

Julian Leslie: We have given clarity. We have a clear plan. Whoever is taking that project forward, at whatever stage, is progressing that as quickly as possible to meet those timescales. The ETDPs are there to set those guidelines and principles as a starting point, which, hopefully, will



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lift the lid on why decisions are made and that transparency. When it is on the ground in that local community, there will inevitably be things that mean that it is a starting point, but it is somewhere to start from. It is an adjust to reflect the local communities and the environment in which the infrastructure is going to be.

Q118 **Ms Billington:** Will those design principles slow it down, bearing in mind that it is supposed to be part of that 2030 target?

Julian Leslie: The whole point is to create the transparency and openness around this to accelerate the delivery. One of the outcomes of the Nick Winser transmission commission's report was to halve the time that it takes to build national infrastructure.

Q119 **Torcuil Crichton:** Thank you all for coming in. Just to pick up on what Wera was saying about landscape intrusion with some massive transformation, there may be tonnes of pylons. People do not mind pylons as long as they cannot see them. If they live in a national park, or on the broads, or in a national landscape, the guidance is that we underground the cables. Does that accurately reflect the constraints that you face, Charlotte, when you are designing the electricity network infrastructure?

Charlotte Mitchell: The policy position, as you have rightly outlined, is that there is a starting presumption for overhead lines and pylons, and that reverses in national landscapes. It has been very helpful for us at National Grid that a starting presumption exists. It is important that there is clarity for us as a developer, but also for communities, about the starting point for the form that the infrastructure should take when a transmission reinforcement is required.

We always consider all options. At a very early stage, we start looking at the strategic options available, and that is the sort of conversation about, "Should this infrastructure go offshore or on land?" If it is determined that it is more appropriate for it to be located on land, we consider overhead lines and undergrounding at all points.

The policy that you have outlined is very helpful in providing clarity and consistency about the way in which we should develop our infrastructure. We are really supportive of the fact that the updated draft NPS rolls that forward, because it is very important to have consistency in developing these projects. As you are aware, we have a portfolio of projects, some of which are more advanced and some of which are at very early stages.

Of course, we need the policies that are in place when we are developing up those proposals, which, right now, is that presumption in favour of overhead lines, with the inverse in national landscapes. We need that policy position to be the same when we are putting our applications forward for consideration for consent as it is when we are developing up those proposals. That is why we support the rolling forward of that policy.

Q120 **Torcuil Crichton:** I get that consistency is good, but would you like a



more nuanced approach? It seems quite a blunt instrument now: national park, underground; anywhere else, overground.

Charlotte Mitchell: It is the starting presumption. As I mentioned, we look at alternatives, and there may be particular contexts in which it is appropriate to deviate from that starting presumption. Of course, where we do, we would need strong justification for doing so, but we certainly do not rule things out on the basis of that starting presumption. It is just that—a starting point from which we should develop our designs.

Lawrence Slade: The only thing that I would add to that is that it is a slightly different situation at distribution level with the visual impact of wood poles being somewhat lower, depending on the size and scale of the voltage that you are talking about, but we would concur with the general principles that Charlotte has just run through there.

Q121 **Torcuil Crichton:** It is not just people who we have to think about. We have to think about the birds and the bats, and other animals. You talked about mitigations that are already taken for wildlife. Would you welcome clearer guidance on how to avoid environmental damage to the bird population?

Charlotte Mitchell: The guidance at the moment is very strong and very clear, so it is right that it is maintained in this updated version of the NPS. I am pleased to see it rolled forward.

Q122 **Torcuil Crichton:** The Planning and Infrastructure Bill is going through, with reforms to the statutory consultation requirements. Would it make it easier for you to make adjustments to design under these proposals?

Charlotte Mitchell: Yes, it might. For National Grid, consulting communities and engaging with stakeholders is a really fundamental part of the way in which we develop our projects. We get very valuable feedback from those conversations, and do, in fact, adjust our proposals off the back of that feedback. Ultimately, that helps us develop the right proposal in the right place. We have higher-quality projects as a result of that engagement.

We support the Planning and Infrastructure Bill's proposed removal of statutory requirements to consult, because the statutory nature of those requirements is quite a blunt instrument and really drives developers to focus on delivering a legally compliant consultation. The removal there will allow us to engage communities in a more meaningful and targeted way, and we can develop bespoke consultation strategies that align with a particular project. As I said, for us, engaging drives better-quality projects, and so we will always be engaging communities and stakeholders.

Lawrence Slade: To support what Charlotte said, what I would add is that it is not about removing or not doing these things, but about looking at how we can streamline the whole process where it is possible to take time out of the system. Referring to your comment around the Planning



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and Infrastructure Bill, we welcome where it is coming from and its main criteria, but I would refer back to my earlier comment that, unless we look at the reforms to land access and planning permission projects, we risk falling at the first hurdle. You have to be looking at those altogether and, in that respect, we would hope that things would go further.

Q123 Torcuil Crichton: That is an important message for us to hear. It is not just visuals. It is economics as well. People say that this pylon infrastructure will affect farms and arable and tourism businesses. Tourism generates £4 billion a year in Scotland, which is what you look at rather than what you consume in terms of electricity. Lawrence, if there were a case for an economic justification to underground instead of overground, would you accept that? Would you work with that? Is there any economic justification?

Lawrence Slade: Yes, if there is a clear economic justification, but you have to remember that we have a duty, effectively, to try to build the system in not just the most technically but also the most economically efficient way, because, ultimately, we have to look at the interests and how this falls through to the end bill. All of those considerations have to be built into this.

At the moment, as my colleagues on the panel have expressed, there is also the timeliness of developing this. Without going into too much detail, the visual impact of undergrounding is not always as straightforward as people might expect it to be. What I am coming to there is that it is not a simple, straightforward answer.

In terms of the economic case, there is a very strong economic growth case for why we should speed things up and look to reduce delays. A lot of projects and economic growth will be enabled by the faster deployment of new connections, particularly on the demand side as well as on the generation side. There are countless examples where that has been delayed or where extra cost has been incurred because of lengthy planning processes.

Q124 Torcuil Crichton: Quite simply, it costs more to put the stuff underground than it does to put it overground. Are there new technologies—and we hear about cable ploughing rather than digging a trench—that might come along and help us?

Charlotte Mitchell: We look at innovative technologies in National Grid. Part of the business is set up to focus on innovation and we are very open to and, more than that, seeking out opportunities through innovation to deliver our projects in a better way.

On cable ploughing specifically, that construction method is well established at a distribution level, but is not used for transmission traditionally, in part because of the size and weight of 400 kV cables, which are very large and heavy, and the depth at which we would need to bury them when we are undergrounding.



Cable ploughing is not a technology that we are able to use right now for transmission networks, but, as I say, innovation is very much something that we are looking at all the time, and there is nothing in the national policy statements that precludes us from bringing forward innovations as and when they are ready to be deployed. Of course, we always need to make sure that any new technology is reliant and resilient. It is very important, of course, given the importance of the transmission network functioning properly, that any innovative technology is tested thoroughly, but the NPS certainly does not hold us back from deploying.

Q125 **Torcuil Crichton:** You are saying that it is a technical constraint rather than a planning one.

Charlotte Mitchell: That is exactly it.

Q126 **Chair:** With HS2, we saw that significant parts of the route ended up going underground after local objections, and the cost rose exponentially, not entirely but largely as a result of that. It also delayed the project. The end result is that we saw the cancellation of the northern leg. Are we in danger of a similar dynamic with energy?

Julian Leslie: We set out the broad strategic level and the energy mix that is required for the nation to meet security supply and the low-carbon ambition, which facilitates all the economic growth that Lawrence and others have spoken about. Overhead line is a well-established technology. It is quicker and cheaper to deploy than undergrounding of cables. Those trade-offs and options are looked at through the processes that we run before we make a recommendation to take a project forward, and then Charlotte and her team pick that up and do the local specifics.

It is true to say, though, that DNV's independent report and the IET report just the other week demonstrate that undergrounding is more expensive and impactful on the environment, and takes longer to construct.

Charlotte Mitchell: Part of why it is very important that the policy set out in the NPS is rolled forward is to ensure that projects that are well developed and further ahead can proceed under the same policy landscape, by which I mean considered at the application stage, against the same policy landscape that has been in place while they have been in development. That policy consistency is a really important piece, and that is part of why we are really supportive of the Government's targeted approach to this update to the NPSs. The updates are focused on a small number of important policy issues, and I am very welcoming of that approach, because it creates that consistency of policy that we as developers need in order to bring these projects forward.

Q127 **Chair:** In practice, how often do you end up with undergrounding?

Charlotte Mitchell: It depends entirely on the context of a specific project. As I said, we always look at the impacts of projects, including landscape, visual and environmental impacts, and find the right balance.



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Of course, the presumption for a starting point of overhead lines is helpful and clear, so that does inform our detailed designs, but it is not to say that we never deviate from that where it is appropriate in a particular context.

Q128 Chair: We heard this morning that consultation should be earlier in the process so that people find it easier to engage, and that consultation should have a simpler approach and highlight the likely issues for local people and communities. Do you agree with what we heard this morning?

Julian Leslie: Yes. One of the rationales for the SSEP and the CSNP that we spoke of already is to get that engagement much earlier in the process. With the strategic spatial energy plan and these 15 or 20 regions across the nation, we consult on the general principles and strategic direction of the network and the energy infrastructure. The CSNP is the next level of detail that then does that strategic optioneering of onshore versus offshore and high-level overground versus underground.

Again, there are opportunities all of the way for people to engage with this process of consultations that we run through the SEA and the HRA processes at each step of the way, so that, when Charlotte and her team are on the ground trying to consent this thing, there have already been three or four opportunities for people to engage with the processes that we run and the methodology that we are applying in order to make the decisions, and to then be consulted on the decisions themselves. The principle is openness and transparency all the way through with the new processes.

Q129 Chair: Lawrence, should the electricity distribution network be covered by the NSIP regime?

Lawrence Slade: Most of the distribution network is covered under section 37 of the Electricity Act, and that is appropriate. However, where individual distribution projects are covered by that regime, they should also be receiving the same level of priority as transmission projects in that way. If there is a crossover between distribution and transmission, it should also be treated in the same way in terms of order of priority and DCO regime.

Equally, there is a strong case to be made that some lines, as I mentioned earlier, particularly at the top end, at the 132 kV level, where, if you look at the plans out to 2050, we expect to see quite substantial growth, should be consented separately under section 37 of the Electricity Act.

Chair: Thank you to all of our panellists. That is the end of this session.

Examination of witnesses

Witnesses: Chandni Ruparelia, Charles Wood and Eleri Wilce.



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Q130 **Chair:** Welcome back to the Energy Security and Net Zero Select Committee hearing on the national policy statements. Would you like to introduce yourselves?

Eleri Wilce: I am Eleri Wilce. I am head of offshore consent for UK and Ireland for RWE, one of the largest power generators in the UK.

Chandni Ruparelia: Good afternoon. I am Chandni Ruparelia. I am chief operating officer at Island Green Power, a solar and battery storage developer.

Charles Wood: I am Charles Wood, deputy director of policy at Energy UK. We represent generators, retailers, and an increasingly diverse range of organisations in between.

Chair: Thank you. You are all very welcome. We look forward to hearing from you.

Q131 **Wera Hobhouse:** Welcome. Thank you for coming in front of our panel. We have heard from industry that the endorsement of the strategic spatial energy plan in the national policy statements could dilute market-led developments for energy infrastructure. Do you agree that this relationship needs to be clearer?

Charles Wood: There absolutely is a need for a greater level of clarity. The strategic energy plans—both the national and the regional approach—are the most comprehensive approach to date when it comes to planning out our system, and are very welcome in terms of a step change in how we deliver clean power. We welcome the fact that it is included in the NPS. At the moment, it is one of many factors that will affect the final decision within that approach, and that is welcome.

There is potential for a bit more detail on things such as the order of process and how the NESO and the decision-making body will interact, as well as a general better understanding of how the connections reform process may then impact on planning reform, as those in the connecting queue will have to now apply for planning at an earlier stage.

We expect that that process, in line with the NESO engagement at earlier stages, means that, by the time that you get to this level, when the decision is being made, you will have already had that consideration of, “Is this a fit within the strategic plan?” We hope that it is aligned already, but there is a vast need for co-ordination across the different bodies, including the Secretary of State, NESO and the networks themselves.

Q132 **Wera Hobhouse:** Do you worry that it will limit capacity? Will it limit the market in terms of coming in and building out or proposing projects because they are currently not in the plan, or not in the optimal areas? We might end up having less renewable energy than we need or than the Government hope is going to be developed by 2030. Do you worry about that?



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Charles Wood: At the moment there is such a large oversubscription of projects in the queue that, if projects were unsuccessful, we feel others would come to the fore. Particularly as we go into those regional system plans, it is critical that we start thinking about things such as housing developments, where data centres are located and how energy demand is changing for electric vehicles and heat. Having a more granular understanding of what is changing where and embedding flexibility in the strategic planning approach will ensure that there are always those signals going to the industry of where to invest, when to invest and how quickly you could likely get a connection.

At the moment we are confident that 2030 can be met under the existing proposals, but we need to see the detail of the strategic energy plan and the CSNP.

Chandni Ruparelia: As a solar developer, we think it might constrict market-led initiatives. As developers, to meet our 2030 to 2035 targets, we need to get investment in already. We have been planning for the next 10 years. For our Cottam and West Burton projects, the connection dates are 2028 and 2029. Funding for those and how we are going to meet those had to happen in 2019.

With the SSEP, we acknowledge the Government's efforts to find optimal locations for energy storage and co-ordinate that with planning and grid, but the concern is there might be a scramble for land. You cannot always judge energy projects based on things such as land. There are so many considerations. Cornwall, for example, is one of the areas of highest irradiation in the UK. You cannot have all the solar energy projects in Cornwall.

As long as the SSEP is an enabling document and is helping to guide solar developers, it is very encouraged and welcome. To the extent that it is being baked into the NPS, there is some concern. Until such time as the SSEP is properly consulted on, you do not really know and we do not understand some of the unintended consequences. Let us have that consultation process and then consider whether to include it in the NPS at the right time. To do so now will make investors quite nervous. It might stop investment for some time because we do not want to tell our investors that we are going to be doing projects in certain locations only to find that we cannot do that once the SSEP has been deliberated on.

Eleri Wilce: I would just reiterate a lot of the comments that my colleagues have made. Yes, the SSEP and the wider strategic plans should work to facilitate, not limit, the deployment of future energy generation projects. We agree that it is too early to reasonably state how the SSEP will interact with the planning regime until such time as it has been fully developed.

Q133 **Melanie Onn:** Chandni, I just wanted to ask a bit more of a probing question. You talked about the 10-year financing for one of your projects. What is happening that is taking 10 years? What could the new process



do to reduce the amount of time that it takes? That is a lengthy period of time.

Chandni Ruparelia: When I say “funding”, it is not just about what our direction of travel is but how we are going to get there. If we ask our investors for a certain amount of money to spend towards projects, are those projects going to be able to be delivered?

When I joined Island Green Power—that was around 2020—we were considering how we were going to fund development and potentially construction and operation. Those discussions were being had in 2019, but the connection date was 10 years on. We have to have that clear pathway. It is a lot of money to invest in these projects. It can take anywhere between £7 million to £8.5 million just to get them shovel-ready and another £6 million to £10 million to get them to construction and operation.

Q134 **Ms Billington:** I just wanted to follow up on Charles’s point about flexibility and Eleri’s and Chandni’s concerns about the constraints on the market. Flexibility quite often requires a wider strategic vision about how energy is going to be used in the place in which it is generated, preferably, or as close as possible. To what extent is there a RESP or local area energy planning dimension of it? Is that something that concerns you? Do you see that as an opportunity? What is your view on doing more local area energy planning?

Chandni Ruparelia: Engaging with the local community and understanding what is the right fit for a local area is very important, but sometimes the practical reality of where a project needs to be is dictated by the grid connections and the location and distance to the grid connection point. It is also dictated by the landscape. We cannot build ground-mounted solar panels in hilly areas.

The regional aspect is very important, but when we plan and do site selection those considerations are already taken into account. I do not think any additional legislation or guidance needs to be mandated to developers. That is already a consideration because it impacts the yield and the ability to construct projects properly. There are a number of different variables that we already have in place because of the on-ground practical realities.

Charles Wood: We are simultaneously concerned and excited. There are a lot of opportunities when it comes to regional and local system planning to make the best of the assets that are available in the area. There is a lot of potential within the Devolution Act that is coming up and within this Planning Bill to make sure that the co-ordination of different levels with the national approach is as effective as possible so that we have the lowest-cost delivery of net zero for all consumers.



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There are, however, a lot of constraints on that capability, particularly when it comes to regional authorities and local authorities and their ability to understand where to begin. How do you start that process?

Going beyond energy, it is no longer just about what we need in the energy sector. It is also about land access, water and transportation. Increasingly, these all need to be looked at in a strategic fashion and thought of in a way that means all those things are connected. Where is your EV charging hub? Where is your data centre connected to a heat network? There are so many examples and so much complexity at this stage that we would welcome more guidance and a direction of travel from the national level to give confidence to local areas to start moving forwards.

We would welcome a national methodology. There is such incredible potential when it comes to that delivery at regional and local level in terms of jobs, growth and making sure we do this as cost-effectively for consumers.

Q135 Ms Billington: That feels very different from Chandni's position and perspective. Chandni has to think about making sure the solar panels are where they work. Everyone else wants the solar panels to be where they work because otherwise you are not going to get the energy. We have the literal geographical constraints, the urban need to use that electricity and power as close as possible to where it is being generated, if we can, and the need to develop flexibility—we have battery storage as well—as well as the limited capability that we have at the moment because of people's know-how about this.

When you think about guidance, what level of guidance would be satisfactory to both of you? You are wary about it being too directional. Charles is worried about it not factoring in all the dimensions that might be required to understand the economic and community needs when it comes to energy.

Chandni Ruparelia: There is already quite a bit of guidance in the NPSs. Planning laws already require us to take those local and national considerations into account. Maybe I am reiterating the point, but every region is going to be different. Early engagement with statutory consultees in the community will inform the site selection process. It will inform the way in which those projects are built.

We have an example of a project where we reduced our red line by about 1,000 acres because it was next to a national landscape. Understandably, we had those early conversations with Natural England. That was a decision that we took as developers. Yes, it will cut almost 200 megawatts of capacity from the project, but that is a fair decision to make given the guidelines within the NPSs already.

There is sufficient guidance out there. If we add additional layers to this, my fear will be that we will just add additional complexity for developers



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like us. We need to try to streamline the process so we can meet our 2030 objectives.

Q136 **Ms Billington:** I have some questions on the new guidance on wake effects from offshore wind turbines. That makes me sound like I really know what I am talking about, but let us see how I wangle my way through this. The Government suggest that their new guidance on wake effects provides greater clarity on how these will be mitigated. Do you agree, or does it essentially leave the problem for industry to sort out itself?

Eleri Wilce: RWE's position is that wake effects are not a topic for the planning process. This is already dealt with within the leasing stages, so within the Crown Estate seabed leasing round. However, if Government do wish to refer to wake effects in planning, the wording must be absolutely crystal clear. Projects should not be expected to damage their own business cases in pursuit of wake mitigation.

At present, we do not feel that the wording is strong enough and does not give us that protection. The wording is currently highly ambiguous. In order to avoid lengthy legal reviews, which we currently think we are going to be facing and which will hold up projects, we feel the wording needs to be strengthened.

We would like the Government to clarify that a project is not required to undermine its own business case when taking all reasonable steps to minimise wake effects. Mitigation actions must be net neutral or positive to be acceptable. At the moment, we do not feel that the wording provides that clarity. However, we do welcome the clarity that compensation arrangements are not necessary as part of the planning process.

Q137 **Ms Billington:** Charles, what do you think about that?

Charles Wood: I broadly agree with the points already made, but I have a general desire to ensure that that is updated as we get more data and more of an understanding of what the potential mitigation actions could be within that framework. As that data increases, we just need to make sure we are keeping that up to date.

Q138 **Ms Billington:** On marine noise policy, we have heard this considerable concern in the industry about Defra's new marine noise policy. How should the national policy statements be amended to reflect this?

Charles Wood: Greater specificity as an addendum would be welcome. The current wording around "best endeavours" is simply unclear. Making sure there is clarity for developers to understand how you evidence that you have given best efforts would be very welcome.

Eleri Wilce: Since the policy's publication, we are already seeing significant difficulties in getting consents through and conditions discharged because of the ambiguity of the wording of "best endeavours".



We also have concerns around the efficacy of noise-abatement systems. There is little evidence to understand what their efficacy is.

Therefore, we would certainly seek for the reference to marine noise policy to be excluded from the guidance until we have clarity on “best endeavours” and understanding of that and further evidence to support the use of noise abatement systems.

Q139 Ms Billington: It will not be any surprise to anyone that, like many planning projects, there seems to be a duplication of environmental data gathering when it comes to offshore wind in the design and mitigations. Should the national policy statements contain clearer guidance to avoid those unnecessary delays as a result of that duplication?

Eleri Wilce: We would certainly welcome any opportunity to reduce the requirement for duplication of survey efforts. Data gathering takes time, is expensive and often leads to delays, especially with regard to agreeing methodologies and scopes with advisers and regulators.

However, it is important that any surveys carried out centrally, for example by the Crown Estate ahead of seabed leasing processes, are agreed with regulators and SNCBs and that developers can rely upon that data. At the moment, impacts are assessed on a project-by-project basis without regard to a more strategic overview. That approach can and has led to delays.

The reliance on a project-by-project impact assessment, where we end up with compensation for a fraction of a kittiwake, for example, leads to significant delays and costs. This is being addressed somewhat through strategic compensation measures, but we would certainly welcome any opportunity to have a more strategic approach to data gathering.

Q140 Ms Billington: Perhaps the focus could be more on habitats as distinct from species.

Eleri Wilce: Yes, absolutely.

Q141 Melanie Onn: I was really interested in the wake effects. The industry seems to be saying, “Just leave us to it”. I do not think that is a sustainable position. We are seeing an enormous growth of wind farms. We are seeing the development of floating offshore wind farms. I refer to my register, by the way, Chair. I am sorry. I should have said that at the outset.

If we keep leaving it to a leasing stage decision, it is going to leave industry with too many problems that it has to try to deal with itself. It will not have any support or early-stage oversight through strategic planning. What are your thoughts on that?

Eleri Wilce: There should not be any requirements, either as part of the planning system or otherwise, to mitigate wake effects physically by



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reducing wake impact through the design or operation of the wind farm for operational, consented, pre-consented or future wind farms.

We have not identified any key change to wind farm design that will mitigate wake effects that does not result in a net reduction in generation overall. There are not any silver bullets. We are not going to be able to design the wind farm so that there are no wake effects.

The buffers that are put in place through the leasing processes can go a long way to help that, but we do not feel we can come up sufficient mitigations so that there will not be an impact on the net generation of power output from these projects.

Charles Wood: I would just note that things do change. Innovation in offshore wind in particular has been a fantastic journey over recent years. It is possible that things will change and adapt as we go further. It is always critical that the planning system and the approach for development considers the newest possible technologies. Right now, I would agree.

Q142 **Claire Young:** We have heard that national policy statements could provide much clearer guidance on what is considered proportionate—this is in relation to solar farms, by the way—when investigative archaeological work is required. Chandni, would you agree?

Chandni Ruparelia: I do. Archaeology is causing quite a barrier. The nationally accepted way to check for heritage assets underground is to carry out various surveys. Often we are being asked to carry out trial trenching simply to validate the actual results of those surveys. It can be very difficult for landowners who are being asked to go on site. You cannot just trial trench a certain corridor. You affect the entire field.

In one of our projects, for example, we have already done about 360-odd acres of trial trenching for that one project. We are being asked now to do another additional 1% trial trenching, which is going to cause almost £700,000 or £800,000 worth of crop loss plus about £1 million to trial trench.

It is not proportionate at the moment. We think that trial trenching should be undertaken when the results of surveys are ambiguous or not clear. There is an inconsistent approach between counties or even within counties about how much trial trenching to carry out. That is really unhelpful.

We think that the results of the geophysics surveys that we carry out are sufficient in order to understand what sort of heritage assets there are underground. To me, rather than having trial trenching as a standard, it should be by exception where the results are not clear.

Q143 **Claire Young:** It has also been suggested that both the national policy statements and the agricultural land classification could usefully be updated to protect agricultural production while recognising the



patchwork nature of land grading. Do you agree with that?

Chandni Ruparelia: Yes. Food security is part of and goes hand in hand with land classification and the use of best and most versatile land. There is no mention of food security within the agricultural land use section of EN-3, even in the current draft. It is important to put that front and centre. It is such a topical issue. It comes up in every single consultation and every single examination phase, but yet the examining authority and planning inspectors have no basis or guidance to make decisions around this very topic.

The use of the land is quite a complicated one because you have very historic ALC mapping, which is not accurate. We have already heard that it does not take into account current land use, the impact of soil degradation from years of farming and the climate change impact as well. The NPS does say that evidence of soil quality can be submitted, but more often than not developers are undertaking site surveys because they are too scared of being caught out for not having undertaken sufficient testing of the land classification. Having some clarity in the NPS around that is going to be helpful for developers.

When we come to the examining stage and when members of the community are discussing this point, it would be helpful for the examining authority to have some basis on which to make a decision.

Q144 **Claire Young:** How would you respond to an explicit requirement for renewable developers to reinstate any negatively affected farmland to a good agricultural condition?

Charles Wood: While that would be helpful for mitigating agricultural concerns, it should be done in direct comparison with other similar uses of the land. Solar inherently leaves the potential for a return to agricultural productivity much more quickly than housing or an additional farmyard. Any requirement should be proportional and we should make sure it is clear how that is being approached.

It is also really important that farmers have the ability to decide. They need to be given the information and decide for themselves whether it would have a negative impact on their land and therefore whether it has an impact on the decision to invest and to open up a new revenue stream for the farm itself.

Q145 **Claire Young:** I was thinking about national food security. That is not just about the individual farmer, their business and what is best for their own business. It is about protecting the best farmland in order to continue food production.

Charles Wood: The best farmland is also the farmland that farmers will want to use for producing food. It is important to note that at present solar coverage in the UK in terms of land use is 0.07%. In a net zero system, it would be 0.5%, so half of a percentage point, which is



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equivalent to what we use for golf courses and less than we use for airports. You have to put it into that context.

Certainly, ensuring that farmers have the ability to choose, ensuring they are getting adequate revenue for the food that they are producing and that that is valued will have a big impact on those decisions.

Q146 **Claire Young:** Eleri and Chandni, did you have anything on that note?

Chandni Ruparelia: You are talking about reinstatement of land at the end of the solar farm. Is that right?

Q147 **Claire Young:** Yes. You could have an explicit requirement for renewable developers to reinstate.

Chandni Ruparelia: We do already. When we enter into option agreements with landowners, it is an option for lease. Typically, the reinstatement obligations under all our leases will say, "The land is to be reinstated to the same if not better condition". The reality is that it will always be in a better condition because in 40 years' time, when you have to reinstate, you are not just going to leave earth. You are going to plant grass seed mix there as well. The land will always be reinstated when it comes to a solar and battery storage project.

Q148 **Claire Young:** You are essentially saying an explicit requirement is redundant because in practice, for business reasons or whatever, that is what already happens.

Chandni Ruparelia: I am happy to accept an explicit requirement, but planning conditions also require land to be reinstated. I do not see the need. It is something that solar and battery storage developers already do.

Q149 **Claire Young:** Could there be more emphasis on combining renewables with other uses? Could the national policy statements be more explicit in encouraging that?

Chandni Ruparelia: The current draft of EN-3 already does that. It is just down to project economics, location and the viability of adding additional technologies to those projects. We all want to try to maximise the use of land where possible, but it is not always possible. In particular, it can be down to the type of grid connection available. Once you have a grid connection, it is difficult to change the technology.

There is a chicken-and-egg situation. Of course, we want to maximise land, but the reality is that, at the moment, there are some limitations on exactly what one can do.

Eleri Wilce: We need to consider it on a case-by-case basis. It is not necessarily something that we can build in.

Q150 **Claire Young:** Charles, is this something that the national policy statements need to make more explicit?



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Charles Wood: No, the NPS is not the appropriate vehicle for that change. Certainly, within wider policy, a better consideration of land rights and access and usage would be welcome. Across energy generation in the connections queue, within housing developments and in a whole range of other sectors, there is a desire to hold on to land and to buy it up at the moment.

Understanding how that is going to impact on our ability to deliver various policy objectives would be welcome, but it is not for the NPS. It is more of a wider Government consideration.

Q151 **Chair:** Could we see an extension of multifunctional use with the right policy approach?

Charles Wood: There would have to be a broader consideration of the approach, but there is potential, certainly.

Q152 **Chair:** You seem to be holding back a bit. Can you say more about how that might work?

Charles Wood: It is difficult to say at the moment without being a little controversial about which sectors are holding on to land. It is a bit controversial.

Q153 **Ms Billington:** Are the housing developers causing you trouble?

Charles Wood: I would not be so specific as to say housing developers, but I would not also not say housing developers. There is just a broader consideration with the rapid increase in terms of build-out of energy infrastructure, housing, new hospitals and airports and ports that are changing their operations.

We have to consider co-location of land and look at the ability to put generation right next to something that is also using it. Within the AI Energy Council, we have to think about how those data centres are going to be located near to or on the same sites as generation capability or flexible technologies such as energy storage. As we go further down towards that pathway to 2050, thinking about things such as water access is going to be even more important.

We have to have that consideration, but it cannot be within planning policy. It has to be a broader conversation. Ministers and Departments have to bump heads and start having a proper conversation about this.

Q154 **Chair:** That was not controversial; it was very helpful. You were talking about farmers prioritising the use of the best grade of agricultural land to farm. Can you demonstrate that, so far, solar, battery storage facilities or indeed onshore wind are going on sites of lower-grade agricultural land?

Charles Wood: I do not have those numbers to hand, but I am certainly happy to follow up in writing.

Q155 **Chair:** Do either of you have that? Could either of you say that with



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confidence?

Chandni Ruparelia: We have to look at the proportion of land being used by solar, as an example, versus the proportion of croppable land being used for growing crops to put into furnaces. The latter use is higher than the use for solar farms.

There is a bit of a misconception around the use of BMV land as a metric. How do you assess BMV land if the datasets are old? If you look at the crops being grown, what are they being used for? Look at potato crops, for example. If you have one rotation of potato crop, you cannot use that land for about six to seven years again, to prevent cyst disease. That land is out of use for growing potatoes. It is still BMV land, but it cannot be used. One of our landowners, for example, has grade 2 land. They were telling us that they were struggling to grow crops to grade 2 standards.

It is difficult to talk purely about BMV land, i.e. whether to avoid it, to justify it or to minimise the use of BMV land. There are so many practical considerations when we talk about BMV.

Q156 **Chair:** Chandni, going back to what you were saying about consultation, give us a sense of how you consult with local communities to get them on side when you are looking at a new project.

Chandni Ruparelia: At the moment, we try to go into communities at a fairly early stage. We consult with statutory consultees first to have an understanding of what the lay of the land is. In terms of consultations, right now we are aligning with all the statutory requirements to consult.

The panel that was here previously expressed some concerns around the fact that developers are so focused on not breaking the law and aligning with the prescriptive and rigid requirements of the consultation process. Meaningful engagement might potentially be lost because we are so focused on making sure every T is crossed and every I is dotted. Early engagement is key for any project. We as developers want our projects to be celebrated in communities.

Q157 **Chair:** What change in the law would you like to see to enable you to consult better?

Chandni Ruparelia: The changes in the Planning and Infrastructure Bill are quite helpful. On the one hand, certain members of the public are going to think that they are removing consultation, but they are not. This is replacing prescriptive consultation with guidance about more meaningful and proportionate engagement. That is the key.

Just by way of example, one of our projects is in quite an isolated site. Our project manager emailed saying, "Here are the dates of the consultation. We do not think many people are going to turn up because it is an area where there are very few people", and yet we are spending the time, money and energy going through that entire process because



we have to. This is a classic example where proportionate engagement would be beneficial. We are not saying we should remove engagement. Public consultation is incredibly important, not just to get the buy-in and trust of the community but to inform our project design. It is definitely key. The steps being taken under the Planning and Infrastructure Bill are quite helpful.

Eleri Wilce: Yes, I completely agree. The formal consultation aspects that have been prescribed within the Planning Act have become quite a tick-box exercise. As responsible developers, we will always engage with the community. We are going to be neighbours with the community. We engage pre-application and in the very early stages. We need to have that input from the community in order to form our plans.

We would welcome guidance, but we would wish to be able to undertake the consultation and engagement with the community in the way that best suits the community as opposed to trying to shoehorn the consultation into a prescribed process.

Q158 **Ms Billington:** What does a successful engagement process look like? What are successful engagement outcomes for you as developers?

Chandni Ruparelia: It is very difficult to get community to be always on the side of solar projects. They are either going to enjoy it or not.

What I find very helpful is going into communities, into town halls, and explaining our project design and our site selection to people. In one particular non-statutory consultation that I went to, we were showing members of the community a permissive path that we were going to be introducing. They said, "It takes us about 40 minutes to walk to the nearest bus stop". They looked at our permissive path and said, "If you just extended this by 10 or 20 meters, it would cut short that walk by 15 or 20 minutes". That is an example of a very positive outcome. We are engaging with what is practical for community members and what is going to be beneficial for them. We have to recognise that we are not going to be able to change the views of people who just do not like solar.

Q159 **Ms Billington:** I am not suggesting that you can change the views of people who do not like solar. What kind of changes might a successful engagement process with the community result in that might benefit the community? Your example of the footpath is well and good. I am thinking about real involvement of the community in designing what is going to be part of their energy system.

Chandni Ruparelia: Many members of the community will not really understand some of the nuances around designing a solar project. For me, the best way to engage is by having those conversations once early-stage proposals have been considered. The red-line boundary, the environmental considerations and the ecological considerations all need to be factored in before we can engage with the community more meaningfully.



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I do agree that the more that they get involved in the overall design, the more helpful it is. As Eleri mentioned, we are going to be in that community for over 40 years. We want to get as much engagement as possible.

Eleri Wilce: It is very much about getting the community involved. As we say, there may be aspects that cannot be designed in consideration of the community, but there are aspects where we can work with the community. That might be things such as the timing of construction activities and appropriate screening to minimise visual impact. We need to set out our commitments and work within the community to understand what their concerns are and address those concerns as far as possible.

We cannot mitigate everything, but we can listen and demonstrate that we are including them. Where there are opportunities for them to influence design, we need to make sure we include those within the process and set out what is not up for consideration or what cannot be changed.

Q160 **Ms Billington:** Can I just press slightly further on this point? What benefit does a community get from hosting one of your projects? What could they have, if we were to change the rules?

Eleri Wilce: We do have community benefit funds. We work very hard with the community. Those are not part of planning considerations. Those are aspects that we have in place once they are hosting the infrastructure. We have to be very careful that we are not promising community benefits as some sort of incentive to host activities and infrastructure.

It is participating in community liaison groups, giving people an opportunity to have their say on how those benefits can be put in place and bringing them along with us and including them through the journey.

Q161 **Chair:** It is interesting that you make that point. The difference between what is a planning matter and what is not is always difficult at all levels. Yet ensuring people get buy-in to your projects is hugely important both for your projects in their own right and the wider agenda. Is there anything that could really help there to bridge that divide?

Eleri Wilce: I cannot think of any specific examples at this point.

Chair: Perhaps you can come back to us, if you think of anything.

Eleri Wilce: I can come back to you, yes.

Q162 **Torcuil Crichton:** I can think of specific examples. You are going to be in communities for 40 years, you say. You are going to make a lot of money. You are talking about community benefit. When people hear "community benefit", they think about five-a-side football strips, astroturf and scout halls. What about giving communities a share and allowing



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them to buy into your project? You do not give it away free. You just let them take a share of that. Have you considered that?

Eleri Wilce: I am from an offshore wind background, so I cannot comment on that specifically. I can take that away and come back to you.

Torcuil Crichton: RWE is onshore and offshore.

Eleri Wilce: Yes, I am from the offshore business. I would need to speak to colleagues about that.

Ms Billington: To be fair, Eleri, other countries have offshore wind farms that are owned by the communities, which effectively host them by them having at least a visual impact on their amenity.

Q163 **Torcuil Crichton:** N4, the nearest offshore wind farm to me is offering £4.5 million a year, index-linked, for 35 years to 2,000 people.

Eleri Wilce: Yes, I will need to take that away and come back to you.

Chandni Ruparelia: All different types of community benefits are up for discussion, depending on the community and what it wants. Certainly, solar developers are screaming out for clarity about what we could do around community benefits. Right now, it is a bit of a hot potato. We want to be able to contribute to the community. If we go to a local rugby club and suggest that we might do something there, everyone gets a bit nervous and thinks, "No, we are not doing something above board. We do not want to engage about money. We do not want to do this".

We are all happy to contribute a significant amount of money towards that community. Whether that is a share and ownership scheme or whether that is something completely different, we would be looking to Government to provide some guidance around what some of those parameters are.

In terms of amount, that is already being discussed by our trade body and all of us in the industry. There is a bracket between £200 and £500 being discussed. It is not so much the amount.

Torcuil Crichton: No, it is not.

Chandni Ruparelia: It is a fair amount. If you look at £500, on a 500 MW project you are talking about £15 million over the life of the project for just one community. If somebody has 10 different NSIPs, that is a significant amount, in my mind.

It is not just about trying to peg an amount per megawatt because every project is different and every project has different economics. The grid connection cost on one project is not going to be the same as the grid connection cost for another project. When it comes to community benefits, it is the community who should decide.



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Right now, we just do not have any real framework within which to have those discussions with the community without them being scared of engaging with us on that topic.

Q164 **Torcuil Crichton:** Conversely, you are also scared that you are trying to subvert—

Chandni Ruparelia: Absolutely, yes. We were rejected. We wanted to do something for a local rugby club. We just thought it would be a nice thing to do. We were told no. What does one do in that situation?

Q165 **Torcuil Crichton:** That is something that policymakers have to look at. Charles, did you want to say something?

Charles Wood: Within the context of community benefits, there is such a wide range of potential community benefits. We need to make sure the NPS guidance is giving those options and looking at the potential. It is not just about financial reward. It is about looking at all the options.

In the broader context, it is important to note that the net zero economy is expected to have a value of £1 trillion by 2030. That is 725,000 jobs by 2030. When we are thinking about community benefits, we need to ensure we are thinking about how you bring business to the local area in terms of supply chains, how you bring skills and retraining into the local area and how you think about the impact on growth and energy bills for the local area in that context?

Q166 **Torcuil Crichton:** I want to ask a slightly different question and take advantage of Eleri's and Chandni's experience. Chandni, you talked about how difficult it is to get these things to the start line. You are spending millions of pounds, and then you are spending millions of pounds on construction as well. We have just recently seen two offshore rigs stall, one in Hornsea and one in Connemara. What is happening with offshore wind farms that is making them stall like that?

Eleri Wilce: There are a number of factors that are influencing the challenges that we are facing as an industry. Supply chain costs are significant. We are in a situation where we have significant increased costs and pressures due to various different factors. We are looking at routes to market. We have had concerns about some of the budgets available for the bidding rounds.

There are all sorts of other aspects that are just increasing the costs and demands on offshore wind developers, not least the requirements for compensation and mitigations. With all of this, we also need to look at the cost to the consumer and make sure we are not getting to a point where the cost of the energy is increasing the cost to the consumer.

Q167 **Torcuil Crichton:** I will bring it back to the agenda now and ask about the Planning and Infrastructure Bill. You mentioned that you were happy with it. The Government have put amendments down that would abolish pre-application consultation. How does that improve community



engagement and consultation?

Chandni Ruparelia: It is removing some of the blockers when it comes to consultation. Rather than trying to go through the mechanics of making sure the consultation happens in a very prescriptive way, there is guidance. As part of the Planning and Infrastructure Bill, the Government are removing that mandatory pre-application consultation. They are not saying that they are going to get rid of consultation altogether.

Having a little bit more flexibility around the type of consultation allows solar developers to do what is right for that community and that type of project. It is more about proportionate engagement rather than engagement for the sake of ticking a box. From my perspective, having a little bit of flexibility goes a long way.

It is also important to point out that there is plenty of opportunity for communities to have their voices heard during the examination phase and in the conditions as part of the DCO, of which there are many. Often, those conditions require us to get the approval of the local planning authorities. Again, they are heavily influenced by what the communities have to say about it.

There are ample opportunities for communities to put in their objections and concerns. They have the opportunity to raise their objections in person, should they wish to, during the examination phase of a project.

Q168 **Torcuil Crichton:** Charles, that is really not how it is seen. Communities see this as a green light for developers to do the least possible.

Charles Wood: That is an unfortunate interpretation. I entirely agree that the removal of statutory approaches allows for that more tailored approach. It is really important that we get across to the public that the pre-application process and the degree to which the engagement process is robust, effective and positive will be a critical factor in how successful any application is. It is still absolutely fundamental to whether that process will go ahead. It is removing the box-ticking exercise and enabling a more varied and specific approach.

Eleri Wilce: I completely agree. We welcome guidance, but that guidance should not be so prescriptive as to replace the requirements within the legislation.

We also need to recognise the need for alignment alongside the wider issues, such as the resourcing of consenting bodies and the local planning authorities. Removing that aspect of formal consultation needs to be considered within the requirement for continued engagement with those bodies.

At the moment, we are still finding considerable difficulties, even where there is a statutory consultation requirement, getting meaningful engagement with some bodies, even when they have cost recovery in place.



It is important that we are not just considering community consultation as part of this reform. We also need to consider the requirement to make sure that statutory bodies and prescribed bodies are still involved in the process, are still encouraged and are sufficiently resourced to engage meaningfully at that early stage. Otherwise, we are just pushing that problem into the examination period.

Q169 Torcuil Crichton: I have one last question, which picks up on what Polly was saying. People feel consulted, but they do not feel listened to. That is a problem. How do we overcome that?

Chandni Ruparelia: It is a bit of a shame that they feel like they are not listened to. With every single project, we do a number of consultations across many different areas to make sure we get as much feedback from the community. We respond to every single objection that is put in. We do not just ignore that. When we see similar points being raised, that is looked at from a design perspective and an overall project perspective. It is not ignored.

The idea that developers just go ahead and do these projects without listening to the community is a misconception. I do not believe that the majority of developers take that position. We have in-house frameworks for the types of issues that keep coming up in our projects. We look at how we can pre-empt those issues so they do not come up again for the next one. That is happening.

Torcuil Crichton: Eleri, you are nodding vigorously.

Eleri Wilce: I completely agree. Our Rampion 2 project, which was recently consented, went through five statutory consultation phases. The requirement to reconsult was on the basis of design changes that came about directly as a result of consultation with landowners and the local communities. The evolution of the onshore cable route came about directly as a result of consultation that was undertaken.

Q170 Luke Murphy: Can I just briefly take you back to onshore wind? Its reintroduction into the NSIP process was very welcome, certainly from my point of view. Could there be any improvement in the guidance that would help avoid the same local opposition that ended up with it being banned in the first place?

Eleri Wilce: I am not sure there is anything specifically that needs updating within the guidance. We welcome the reintroduction of onshore wind into the national policy statements

The threshold within the national policy statements is 100 MW. Realistically, we are unlikely to put forward onshore wind projects in England that reach that 100 MW threshold. They are not necessarily going to be subject to the national policy statements in the same way. We would urge that the national planning policy framework is updated to reflect this.



Q171 **Luke Murphy:** You think the threshold should be much lower. Do you have a number in mind?

Eleri Wilce: We put in a request for 50 MW. We think 50 MW is more realistic.

Q172 **Luke Murphy:** Charles, do you have any thoughts on possible changes to guidance and the threshold?

Charles Wood: First, it is welcome to see onshore wind finally being put on the same footing as other technologies. This is a welcome change.

There is a need for clear guidance. There is also a need for wider engagement with the public about the transition to net zero and a grown-up discussion about what that looks like, in terms of both the onshoring of generation capabilities and looking at transmission networks and some of those wider infrastructure impacts. How is that going to impact you on a local level? That will help us to get ahead of that potential.

The numbers are increasing in terms of the popularity of having a local solar farm or a local wind farm compared to those who express concerns about it, which is increasingly on a lower scale. That is fantastic to see, but it needs to continue. We need to continue having that grown-up conversation about the transition.

In terms of the 100 MW threshold, there needs to be a wider consideration of what that means and what that should look like. As the technology has developed, you are getting fewer wind turbines on farms to meet that target, but they might be taller; they might be larger; they might sound different or operate differently. You have to consider that in the approach. 100 MW is a nice ambitious target to go for, but it may not be realistic until wind turbines are of a scale to deliver that on a smaller patch of land.

Q173 **Luke Murphy:** Thanks for your answers. I will just ask that guidance question slightly differently. Is there anything that we are doing now or should be doing now that is different from the approach that was taken when the ban was first imposed and that would bring more communities along with us?

Eleri Wilce: We already consult. As we have previously alluded to, the same principle applies to every technology. It is about getting engagement with the communities at an early stage and making sure we are involving them in the decision-making process.

Charles Wood: It is also important to think about community energy projects and the way that communities are starting to look for opportunities rather than seeing them as a potential negative. How do we get communities involved at that earlier stage? How do we give communities a better understanding of what the options are, if they want to invest in wind or solar?



We need to make sure there is a route for communities to act first and go first. Once that starts to happen, we will have that positive connotation and it will spread via word of mouth: "Yes, we have a wind farm nearby, and it is fantastic".

Q174 Luke Murphy: Just very quickly, the guidance says that the most significant impacts are only going to happen within a close vicinity of the site. Is that true? It is a genuine question. Is it that, if people are impacted because they can see it from a distance, that should not be classified as a significant impact?

Eleri Wilce: Landscape and visual impact is assessed in accordance with the regulations. There is topic-specific guidance prepared by statutory nature conservation bodies. There is a tried and tested way of assessing visual impact.

If I am honest, all onshore wind farms will include significant effects on landscape in some form or another. The question is whether or not significance equals acceptance. That is not necessarily the case. If everything that was significant was unacceptable, nothing would get built. It is the decision-maker's role to weigh up the benefits and impacts, both positive and negative, and the arguments for and against.

To be honest, it is very subjective. Beauty is in the eye of the beholder. We cannot prescribe what is acceptable in terms of visual impact, but there are ways and means by which we can mitigate some of that or consider particularly sensitive views.

Q175 Chair: If the 100 MW threshold is challenging, are we going to struggle to see any new onshore wind?

Eleri Wilce: Not necessarily, no. It is just that they will be consented under the Town and Country Planning Act as opposed to the national—

Chair: We know how strong the opposition to that regime is.

Charles Wood: Smaller projects will still come forward. It is specific to the NSIP regime. Wider and smaller projects will continue through local planning arrangements. We do not see it as having the impact of reducing onshore wind. The changes that are set out at the moment would look to increase the amount of onshore wind. It seems very much like that is the direction of travel. That should be the outcome that we see. We do not see that that would have a negative impact on the likelihood of investment in onshore wind.

Q176 Chair: Eleri, I will come back to what you were saying about the reasons why we have seen a bit of stalling in offshore wind. Is one of the reasons due to the fragmentation of the political consensus around the decarbonisation agenda and the effect that that might have on investors?

Eleri Wilce: I could not comment on that. I do not have a view on that. I can ask and come back to you.



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Chair: That would be helpful. Thank you. That brings us to the end of the session. Can I thank our three panellists again for your evidence this afternoon? I encourage you to write in with the various things that you have said that you will do.