

Energy Security and Net Zero Committee

Gridlock or growth? Avoiding energy planning chaos

Second Report of Session 2024–25

HC 868

Energy Security and Net Zero Committee

The Energy Security and Net Zero Committee is appointed by the House of Commons to examine the expenditure, administration, and policy of the Department for Energy Security and Net Zero and its associated public bodies.

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Summary

We reviewed the Government's proposed updates to three of the National Policy Statements for energy infrastructure, published on 24 April 2025. The National Policy Statements will have a central role in the delivery of urgently needed infrastructure critical to the success of the energy transition. The Government's proposed updates come at an important point, following the publication of the Clean Power 2030 Action Plan, the completion of the National Energy System Operator's reforms to grid connections and when work is well underway to produce the Strategic Spatial Energy Plan and the Centralised Strategic Network Plan.

We have been immensely frustrated and disappointed by the disjointed engagement which the Government afforded us, severely limiting our ability to create added value, by test and challenge, which is the purpose of involving Select Committees in the scrutiny of National Policy Statements. The Government has failed to respect the value of Parliamentary scrutiny in this process.

Although we welcome the new strategic framework for energy infrastructure planning, we feel that the National Policy Statements should plainly acknowledge that this framework represents a significant departure from a market-based energy system. The relationship between National Policy Statements, the Land Use Framework and strategic plans needs more precise clarification, particularly regarding how the availability and prospects of a grid connection should be considered within the development consent process.

Rigorous public consultation and engagement will be essential for the Strategic Spatial Energy Plan and the Centralised Strategic Network Plan to have sufficient authority to fulfil their central roles. We commend the National Energy System Operator's commitment to engaging with diverse groups in the development of these plans. However, we have yet to see sufficient evidence in practice of the stated ambition to improve the outcomes of public engagement. Targeted, deliberative and meaningful engagement with communities who will host this infrastructure in the years to come is indispensable. We recommend that the draft Strategic Spatial Energy Plan should be published for consultation by the end of February 2026 to allow time for local people to be involved in such significant changes to their communities.

Although we support the presumption of consent for low carbon infrastructure with Critical National Priority status, we are not persuaded that the Government has sufficiently considered how aspects of this policy might affect the achievement of biodiversity targets.

We also have concerns about several particular issues:

- We are gravely concerned by reports that many ecological enhancements and landscape mitigations promised by developers are never delivered in practice. This indicates systemic failings, brings the planning system into disrepute, and questions whether the Government will be able to fulfil its ambitions to build critical infrastructure in a nature positive way.
- Whilst we accept that there are areas where it is unavoidable, we are surprised that the proposed guidance for onshore wind does not contain a stronger presumption against building on land with high ecological and climate value.
- We want to see guidance on the extent to which offshore wind developers are expected to damage their own business case in taking “all reasonable steps” to minimise inter-array wake effects.
- We are concerned that the current guidance on agricultural land classification and land type for solar farms is ambiguous and equivocal, particularly in relation to the use of Best and Most Versatile agricultural land. We are concerned that a lack of clear guidance is leading to unnecessary arguments about food security taking up disproportionate time and resources during examinations.

1 Our engagement with the Department

1. The process for considering National Policy Statements (NPS) is long-established though has not been extensively used since creation by the Planning Act 2008. The previous Government consulted on and passed National Policy Statements on energy prior to the 2024 General Election. It was a drawn-out process. On 20 September 2021, the Government laid the revised (draft) National Policy Statements for Energy Infrastructure before Parliament and, in his accompanying Written Statement,¹ Rt Hon Kwasi Kwarteng, then Secretary of State for Business, Energy and Industrial Strategy (BEIS), indicated that the public consultation, the appraisal of sustainability and parliamentary scrutiny should be concluded by 28 February 2022. The BEIS Committee had 23 weeks for its consideration. Consistent with the process adopted in 2022, on 4 June this year, the Department for Transport laid its own consultation in respect of the National Policy Statements on Ports which provided the Transport Select Committee also with 23 weeks for its consideration.²
2. The Government launched its public consultation on the revised (draft) NPS, supporting habitats and sustainability reports and associated appendices on 6 September 2021 which closed on 29 November 2021. The Business, Energy and Industrial Strategy Committee, designated by the Liaison Committee for the task, launched its inquiry on 3 November taking evidence on 7 December 2021 and 18 January 2022 and published its Report on 25 February 2022.³
3. The response, issued by the new Department of Energy Strategy and Net Zero (DESNZ) was published by our predecessor Committee on 27 April 2023.⁴ The government re-consulted on the statements and eventually laid them, formally, in Parliament on 22 November 2023, along with a Written Ministerial Statement.⁵ In the absence of objection from either House of

1 [Draft Revised Energy National Policy Statements](#) HCWS295, 20 September 2021

2 [Proposed Revision of the National Policy Statement for Ports](#) HCWS681, 4 June 2025

3 Business, Energy and Industrial Strategy Committee, Ninth Report of Session 2021–22, [Revised \(Draft\) National Policy Statement for Energy](#)

4 Business, Energy and Industrial Strategy Committee, Fourth Special Report of Session 2022–23, [Revised \(Draft\) National Policy Statement for Energy: Government response to the Committee's Ninth Report of Session 2021–22](#)

5 [Transforming Great Britain's Electricity Network](#) HCWS62, 22 November 2023

Parliament the statements were designated by the Secretary of State (then Rt Hon Claire Coutinho MP) on Tuesday 16 January 2024. In July 2024, after the General Election, the new Government launched a review of the energy National Policy Statements to ensure they aligned with the clean energy mission of the new administration.

4. The Department began a negotiation with this Committee early in 2025, amongst other things, to gauge our willingness to conduct its scrutiny concurrently with the public consultation run by DESNZ. We raised concerns, privately with the Department, about the length of time it was willing to give us to produce a Report. On 28 April, the Department wrote, notifying us that the public consultation had been launched and that the relevant period for the Committee would be eight weeks.⁶ This meant the Committee, running its inquiry concurrently, would not be able to take the responses to the Government consultation into account as part of its evidence gathering. We had no way of knowing whether responses to our call for evidence would be as detailed as the responses made to the government consultation. We therefore raised our concerns with the Government that we would not be in a position to carry out our responsibilities in full, make a full set of recommendations and provide the Government with the best possible support in its development of its emerging policy.
5. We launched our inquiry into the National Policy Statements on 25 April 2025 and arranged two meetings on Wednesday 21 May with an eye to drafting and publishing a Report ahead of 23 June (eight weeks from the launch of the government consultation). It was, therefore, a surprise when the Department contacted us on 22 May⁷ announcing that it had laid its initial proposals for the statements and that the relevant period would begin on 22 May rather than 28 April. We had already held oral evidence sessions and re-arranged our work programme to accommodate the unusually short timescale provided to us, so it wasn't practical for us to use this change to the deadline beyond having slightly more time to draft this Report.

6 Letter from the Minister for Energy to the Chair regarding parliamentary scrutiny of Energy National Policy Statements, [28 April 2025](#)

7 Letter from the Minister for Energy to the Chair regarding parliamentary scrutiny of Energy National Policy Statements, [22 May 2025](#)

6.

CONCLUSION

We find it immensely frustrating that the Government chose to act in a way which appeared to acquiesce to our requests for additional time to consider its draft National Policy Statements on Energy but only after we had compressed our schedule and carried out two oral evidence sessions on the same day. Obviously, had we been afforded the courtesy of notification of the arrangements in advance, we could, and would, have waited until the end of the public consultation period before commencing using the information arising from that process to inform our oral evidence sessions and create the added value, by test and challenge, that the process was designed to encourage. In the event, the additional time, while it allowed a less rushed consideration of the evidence before us, did not provide significant opportunity to broaden, or deepen, the scrutiny we could bring to bear as it came too late for us to change the questions that we were able to put to our witnesses.

7.

CONCLUSION

The Government has failed to respect the value of Parliamentary scrutiny in this process. It refused to listen to our concerns with its initial timescales until it was too late for us to utilise additional time effectively. The issues considered in the Report would have been better, and more comprehensively, examined and put to the test had the Government been open about the arrangements and told us, from the very start, that the deadline for producing our findings was to be 21 July, rather than 24 June.

8.

CONCLUSION

These statements are very important in determining how energy infrastructure will be developed for the foreseeable future. The process was established, by the last Labour government, to provide Parliament with a voice and time to determine what to say. It is disappointing that the current Government has failed to create sufficient space in which an effective and helpful Parliamentary process could take place.

9.

RECOMMENDATION

Given that the Government, in its Planning and Infrastructure Bill, is seeking to disapply the current requirement for the Secretary of State to respond to any resolutions made by a committee in either House of Parliament, we recommend that the Government, in future, ensures that:

- a. Select Committees are provided with at least ten sitting weeks in which to consider future National Policy Statements and proposed amendments to an existing NPS,

- b.** this period should never commence before the conclusion of the department's related public consultation process, and
- c.** Parliament has a period of at least ten sitting days, in which consideration of the recommendations of a Select Committee can take place, before the NPS or amended NPS is designated by the relevant Secretary of State.

2 The new strategic framework for energy infrastructure planning

10. The Government’s proposed updates to the Overarching National Policy Statement for Energy (EN-1) aim to support a coordinated approach to achieving Clean Power by 2030 and net zero by 2050 by endorsing several strategic plans. These include the Clean Power 2030 Action Plan,⁸ published in 2024, as well as the Strategic Spatial Energy Plan and the Centralised Strategic Network Plan, which the National Energy System Operator (NESO) is due to publish in 2026 and 2027 respectively.⁹
11. Our evidence has highlighted broad support for these strategic plans.¹⁰ However, we heard that the Government needs to consider the exact relationship that strategic plans will have with the National Policy Statements (NPS).¹¹ Existing guidance upholds the authoritative status of the NPS in national infrastructure planning with the statement that, although the Secretary of State should “consider” spatial plans, the NPS prevail in the event of any conflict between these documents.¹² Some have called for the Government to clarify the primacy of the NPS still further.¹³ However, for the

8 Department for Energy Security & Net Zero (DESNZ), [Clean Power 2030 Action Plan](#) (December 2024).

9 National Energy System Operator (NESO), [Strategic Spatial Energy Plan: Methodology](#) (May 2025), p 12; Ofgem, [Decision: Future Energy Pathways Guidance](#) (February 2025), p 4. NESO has recently published its methodology for the SSEP and will consult on the CSNP methodology in the second quarter of 2025: NESO, [Strategic Spatial Energy Plan: Methodology](#) (May 2025); ‘[Strategic energy planning \(SEP\) publications, consultations and updates](#)’ (accessed 3 June 2025).

10 See, for example National Grid ([NPE0041](#)), Energy UK ([Q131](#) [Charles Wood]), the Royal Society for Protection of Birds (RSPB) ([NPE0034](#)) and Campaign to Protect Rural England (CPRE) ([NPE0029](#)).

11 See, for example [Q131](#) [Charles Wood]; The National Infrastructure Planning Association ([NPE0039](#)); [Q44](#) [Peta Donkin]; [Q45](#) [Ali Leeder]; Mr Nicholas Margiotta (Retired at Not Applicable) ([NPE0002](#)); Institution of Engineering and Technology ([NPE0004](#)); Solar Energy UK ([NPE0013](#)); and the Nuclear Industry Association ([NPE0019](#)).

12 DESNZ, [Overarching National Policy Statement for Energy \(EN-1\)](#) (April 2025), para 4.1.16.

13 The National Infrastructure Planning Association ([NPE0039](#)); [Q44](#) [Peta Donkin]; [Q45](#) [Ali Leeder].

reasons given below, even the present guidance, that the NPS prevail, no longer reflects the important role that strategic plans are intended to have in the future development of energy infrastructure.

12. The stated relationship between strategic plans and national planning policy is concerning for two main reasons. First, it is not clear how the regional capacity limits specified in strategic plans, the optimal areas for particular technologies, or the likelihood of a project securing a grid connection should be factored into decisions about development consent. Second, regarding electricity transmission infrastructure, there must be certainty about precisely what the National Policy Statements endorse from the Centralised Strategic Network Plan.
13. We explain these points below, beginning with the Clean Power 2030 Action Plan and the Strategic Spatial Energy Plan before turning to the Centralised Strategic Network Plan.

The Clean Power 2030 Action Plan and the Strategic Spatial Energy Plan

14. The Government's proposed updates to EN-1 endorse both the Clean Power 2030 Action Plan and the Strategic Spatial Energy Plan.¹⁴
15. The Government's Clean Power 2030 Action Plan established a national "Clean Power Capacity Range" for the deployment of low carbon electricity generation, storage and flexibility technologies needed by 2030.¹⁵ For renewables, these are 43 – 50 gigawatts (GW) of offshore wind, 27 – 29 GW of onshore wind and 45 – 47 GW of solar.¹⁶ The plan also contains regional capacity breakdowns which estimate, in megawatts (MW), the necessary volumes of solar, onshore wind and battery storage across different parts of the electricity transmission and distribution networks.¹⁷ For example, for solar power generation connected to the transmission network, for 2030 these regional capacity breakdowns are only 100 MW in East Anglia and 200 MW in Southern England but 4000 MW in the Midlands and 2,100 MW in Central England.¹⁸

14 DESNZ, [Overarching National Policy Statement for Energy \(EN-1\)](#) (April 2025), paras 2.2.5, 2.3.1 to 2.3.6, 2.4.6, 3.2.3, 3.2.5, 3.3.16, 3.3.19, 3.3.22, 3.3.24, 3.4.5, 3.5.3, 4.1.2 and 4.1.15.

15 DESNZ, [Clean Power 2030 Action Plan](#) (December 2024), p 32.

16 DESNZ, [Clean Power 2030 Action Plan](#) (December 2024), p 32.

17 DESNZ, [Clean Power 2030 Action Plan: Connections reform annex](#) (Updated April 2025), pp 12 to 17.

18 DESNZ, [Clean Power 2030 Action Plan: Connections reform annex](#) (Updated April 2025), p 13.

16. Under the heading, “Meeting Clean Power 2030 and net zero”,¹⁹ the Government’s proposed updates to EN-1 reinforce the “Clean Power Capacity Ranges” in the plan with the following wording:

We need to rapidly increase deployment of all relevant infrastructure to meet the Clean Power 2030 Mission capacity ranges and decarbonise the power sector... Meeting the renewable capacities set out in the DESNZ ‘Clean Power Capacity Range’ is achievable but will require deployment at a sharply accelerated scale and pace.²⁰

17. The proposed updates also endorse the Strategic Spatial Energy Plan (SSEP). That plan, being developed by NESO,²¹ will map the quantities and types of electricity and hydrogen generation and storage infrastructure needed in the longer term to achieve net zero by 2050.²² Similarly to the Clean Power 2030 Action Plan, the SSEP is expected to identify the capacity for different electricity generation and storage technologies within 15 to 20 zones across Scotland, England and Wales.²³ For example, in one zone, the SSEP might specify 10 GW of offshore wind energy and 500 MW of solar; in another zone it might specify 5 GW of onshore wind.²⁴
18. The Clean Power 2030 Action Plan, the SSEP and the Centralised Strategic Network Plan are described as the Government’s “strategic framework” which “should be considered by applicants ... and used to inform developments of new energy infrastructure projects”.²⁵ The Secretary of State is also required to consider these spatial plans in decision-making.²⁶

Explaining the extent of departure from a market-based energy system

19. We heard concern from some that the endorsement of strategic plans within the National Policy Statements could mean a shift away from market-led development of energy infrastructure and that the role of the SSEP should be clarified. RenewableUK told us:

19 DESNZ, [Overarching National Policy Statement for Energy \(EN-1\)](#) (April 2025), para 2.3.

20 DESNZ, [Overarching National Policy Statement for Energy \(EN-1\)](#) (April 2025), paras 2.3.4 and 2.3.6.

21 NESO, [Strategic Spatial Energy Plan: Methodology](#) (May 2025).

22 NESO, [Strategic Spatial Energy Plan: Methodology](#) (May 2025), p 5.

23 [Q96](#) [Julian Leslie]. For further information, including an illustrative map, see: NESO, [Strategic Spatial Energy Plan: Methodology](#) (May 2025), ch 3.

24 [Q96](#) [Julian Leslie]; NESO, [Strategic Spatial Energy Plan: Methodology](#) (May 2025), p 78.

25 DESNZ, [Overarching National Policy Statement for Energy \(EN-1\)](#) (April 2025), para 3.2.5.

26 DESNZ, [Overarching National Policy Statement for Energy \(EN-1\)](#) (April 2025), para 4.1.15.

The planning system must remain flexible and responsive to viable projects, not limited by evolving forecasts... Industry would strongly oppose a central plan determining outcomes, rather than the merits of an individual project and market opportunities.²⁷

Similarly, Chandni Ruparelia, Chief Operating Officer at Island Green Power, warned of a “scramble for land” and suggested that the SSEP “might constrict market-led initiatives”.²⁸ On the other hand, she explained that as “an enabling document” to help guide solar developers, the SSEP would be welcomed.²⁹

- 20.** Guidance in EN-1, which remains unchanged, purports to maintain the Government’s commitment to a “market-based energy system”:

It is not the role of the planning system to deliver specific amounts or limit any form of infrastructure covered by this NPS. It is for industry to propose new energy infrastructure projects that they assess to be viable within the strategic framework set by government. This is the nature of a market-based energy system. With the exception of new coal or large-scale oil-fired electricity generation, the government does not consider it appropriate for planning policy to set limits on different technologies....³⁰

- 21.** Likewise, guidance on renewable energy infrastructure in the National Policy Statement for Renewable Energy Infrastructure (EN-3) still maintains that “it is for applicants to decide what applications to bring forward”.³¹ It is further stated that “the government does not seek to direct applicants to particular sites for renewable energy infrastructure”.³²
- 22.** The current wording risks making this guidance inconsistent with the anticipated roles of both the SSEP and the Clean Power 2030 Action Plan. For example, the Government’s commissioning of NESO to produce the SSEP explained that the reason for amending the National Policy Statements following production of the plan would be “to incorporate the SSEP or its spatial outputs”.³³ Likewise, NESO’s methodology for the SSEP confirms that “it is intended the SSEP will become part of the framework of planning

27 RenewableUK ([NPE0036](#)).

28 [Q132](#).

29 [Q132](#).

30 DESNZ, [Overarching National Policy Statement for Energy \(EN-1\)](#) (April 2025), para 3.2.4.

31 DESNZ, [National Policy Statement for Renewable Energy Infrastructure \(EN-3\)](#) (April 2025), para 2.3.5.

32 DESNZ, [National Policy Statement for Renewable Energy Infrastructure \(EN-3\)](#) (April 2025), para 2.3.5.

33 DESNZ, [Strategic Spatial Energy Plan: Commission to the National Energy System Operator](#) (October 2024), p 6.

systems across GB”.³⁴ Furthermore, Julian Leslie, NESO’s Director of Strategic Energy Planning and Chief Engineer, accepted that the SSEP does indeed mark a shift away from a market-based energy system. He explained that the market to date has resulted in the grid connections queue being “seven or eight times” oversubscribed and that the purpose of the SSEP and the Clean Power 2030 Action Plan is to direct the market where to build:

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... If we left it to its own, we would have 70 gigawatts of batteries on the system, which is unbalanced.³⁵

23. CONCLUSION

We welcome the new strategic framework for energy infrastructure planning which the Government proposes to endorse in the National Policy Statements. However, even with these changes, the National Policy Statements do not sufficiently reflect the highly important role that strategic plans are intended to have in guiding future energy infrastructure development to achieve the Government’s 2030 and 2050 targets. The relationship between the plans and the Nationally Significant Infrastructure Projects regime is far from clear.

24. CONCLUSION

The Government’s new strategic framework for energy infrastructure planning represents a significant departure from the existing market-led approach to development by industry. The National Policy Statements should define what is set centrally and what is expected from industry plainly and transparently, to give certainty and avoid ambiguity.

25. RECOMMENDATION

The Government should amend the National Policy Statements for energy infrastructure to clarify the precise relationship and hierarchy between these documents and the strategic plans which the proposed updates endorse.

34 NESO, [Strategic Spatial Energy Plan: Methodology](#) (May 2025), p 43.

35 [Q95](#) [Julian Leslie].

Regional and zonal capacities in the Clean Power 2030 Action Plan and the Strategic Spatial Energy Plan

26. Uncertainty over the future relationship between strategic plans and the National Policy Statements centres upon the regional capacity breakdowns for different technologies specified in the Clean Power 2030 Action Plan. These are due to be supplemented by zonal capacities specified in the SSEP.³⁶
27. The Government’s Clean Power 2030 Action Plan and the “Clean Power Capacity Ranges” within it are referred to as “targets” in several passages within EN-1.³⁷ The same language is echoed in the proposed updates to EN-3 and the National Policy Statement for Electricity Networks Infrastructure (EN-5).³⁸ It has been argued that describing the “Clean Power Capacity Ranges” as “targets”, rather than “hand rails”, could lead to them being misinterpreted as caps on the need for certain types of energy infrastructure in particular areas, which would be incorrect.³⁹ This debate suggests that important questions remain unanswered. These include whether the precise electricity generation and battery storage capacities specified in strategic plans, on a national and regional basis, can be sufficient grounds to refuse applications for development consent which exceed or are inconsistent with them.⁴⁰
28. The Secretary of State has previously suggested to us that the “Clean Power Capacity Ranges” should be seen as a “floor rather than a target”.⁴¹ However, we asked Julian Leslie for NESO’s answer to what would happen if a proposed development were located outside the optimal areas for the technology in question or exceeded the capacity specified for that technology within the region. He reminded us that, to secure a grid connection, a developer must demonstrate that a project is “needed”.⁴² He explained that the need for a project will be determined by the Clean Power 2030 Action Plan and, beyond that, the SSEP, regardless of whether it is granted development consent.⁴³

36 See para 17.

37 DESNZ, [Overarching National Policy Statement for Energy \(EN-1\)](#) (April 2025), paras 2.3.1, 3.2.6, 3.3.19, 3.3.75 and 4.2.4

38 DESNZ, [National Policy Statement for Renewable Energy Infrastructure \(EN-3\)](#) (April 2025), para 1.1.3; [National Policy Statement for Electricity Networks Infrastructure \(EN-5\)](#) (April 2025), para 1.1.2.

39 The National Infrastructure Planning Association ([NPE0039](#)); Solar Energy UK ([NPE0013](#)); [Q45](#) [Ali Leeder]; [Q65](#) [Peta Donkin].

40 These questions were posed by RenewableUK ([NPE0036](#)) and Solar Energy UK ([NPE0013](#)).

41 Oral evidence taken on 15 January 2025, [Q354](#) [Rt Hon Ed Miliband MP].

42 [Q97](#).

43 [Q97](#).

Consideration of the availability of, and the prospects of securing, a grid connection

29. It is clear from our evidence that whether a renewable energy project is likely to secure a grid connection is already a contested issue with applications for development consent orders.⁴⁴ The conclusion of NESO's reforms to grid connections has caused us to consider how the issue will be addressed in future and whether existing guidance and procedures will allow for this to be done accurately, efficiently and fairly.⁴⁵ NESO's Gate 2 Readiness Criteria envisage some projects applying for development consent, and potentially proceeding through further stages of the process, before they have received a grid connection offer.⁴⁶
30. We heard that the availability of a grid connection should be given significant weight in national planning policy, as one of the most decisive factors in determining location.⁴⁷ However, the same witnesses suggested that when a project may be *less likely to secure a grid connection* because it is incompatible with strategic plans, this should *not* be a relevant consideration.⁴⁸

CONCLUSION

It seems to us that this would be inconsistent. The availability and prospects of securing a grid connection are issues that should cut both ways, weighing for, or against, the grant of development consent depending on the circumstances.

31. Under NESO's Gate 2 Strategic Alignment Criteria there are four grounds on which a project might be "needed", three of which are unconcerned with either the Clean Power 2030 Action Plan or the SSEP.⁴⁹ The proposed updates to EN-1 fail to reflect this complexity and explain how the application of these criteria should be recognised in the development consent process. For example, this might be relevant where a project is not aligned with the Clean Power 2030 Action Plan but is still likely to secure a grid connection because it is eligible for relevant "protections" or can be designated as "needed" instead.⁵⁰

44 The National Infrastructure Planning Association ([NPE0039](#)); CPRE ([NPE0029](#)); [Q7](#) [Jackie Copley].

45 NESO, [Connections Reform Final Methodologies](#) (April 2025) (accessed 19 June).

46 NESO, [Gate 2 Criteria Methodology](#) (April 2025), pp 12 and 30 to 32.

47 RenewableUK ([NPE0036](#)); Solar Energy UK ([NPE0013](#)); [Q68](#) [Ali Leeder]; [Qq69-70](#) [Peta Donkin].

48 RenewableUK ([NPE0036](#)); Solar Energy UK ([NPE0013](#)); [Q68](#) [Ali Leeder]; [Qq69-70](#) [Peta Donkin].

49 NESO, [Gate 2 Criteria Methodology](#) (April 2025), pp 12 and 33 to 46.

50 NESO, [Gate 2 Criteria Methodology](#) (April 2025), pp 12 and 33 to 46.

32.

RECOMMENDATION

We acknowledge the concern that strategic plans should not predetermine the outcome of any application for development consent. However, neither should the planning system be blind to the very existence of such plans and, most importantly, to their possible impact on the prospects of a project securing a grid connection. It would undermine the purpose of strategic plans if the Secretary of State were unable to take them into account in the planning balance.

- The National Policy Statements should clearly recognise, as a material consideration, the regional and zonal capacities for different technologies specified in the Clean Power 2030 Action Plan and the Strategic Spatial Energy Plan.
- The National Policy Statements should clearly recognise, as a material consideration, the optimal areas for different technologies identified in the Strategic Spatial Energy Plan.

33.

RECOMMENDATION

There needs to be more coordination between the application processes for development consent and a grid connection, given that each is highly relevant to the other and both will be influenced by the Clean Power 2030 Action Plan, the Strategic Spatial Energy Plan, and the Land Use Framework. It is essential that developers are not left stuck in a situation in which they cannot progress planning consent without more certainty in relation to the prospects of securing a grid connection and vice versa.

- The Government and the National Energy System Operator (NESO) should review how the application processes for development consent and a grid connection will interact, to achieve greater coordination between them.

34.

RECOMMENDATION

The National Policy Statements should give significant weight to the availability of a grid connection, as a paramount consideration in determining where electricity generation projects can be located. However, by the same token, where a project has not yet secured a grid connection, the prospects of doing so should also be a material consideration weighing for or against the grant of development consent. NESO may need to provide the Secretary of State with information to ensure that this question is considered accurately, fairly and efficiently within the development consent process.

- The Government should strengthen the existing guidance in the National Policy Statements to clarify that the Secretary of State should give significant weight to the availability of a grid connection.
- The National Policy Statements should clarify how the Secretary of State should assess the future prospects of a project obtaining a grid connection, with reference to NESO's recent reforms to this process.
- The Government and NESO should assess whether, and in what circumstances, NESO may need to provide the Secretary of State with information about the prospects of a project obtaining a grid connection and how far it is aligned with strategic plans.

The Centralised Strategic Network Plan

35. The Government's proposed updates to the National Policy Statements also endorse the Centralised Strategic Network Plan (CSNP) for electricity transmission infrastructure, which NESO is due to publish in 2027.⁵¹ New guidance provides that, where the need for an electricity transmission project is "assessed and justified" through a CSNP, the Secretary of State will take the need for that project as established and not question it during the development consent process.⁵² The updates also endorse NESO's assessment of alternative options to address network needs in creating the CSNP, "on the grounds of environmental impacts, community impacts, economic cost, deliverability and operability criteria".⁵³ The anticipated effect of these endorsements are explained in EN-1, paragraph 3.3.79, in the following terms (*emphasis added*):

This NPS therefore accepts the proposed *strategic parameters* for proposed network infrastructure outlined in the CSNP. This *could mean, but is not limited to*, the choice of onshore overhead High Voltage Alternating Current lines, or the use of offshore High Voltage Direct Current cabling. Where a *strategic solution* is proposed in the CSNP, the choice of *strategic solution* does not need to be re-examined, and *alternatives to that choice do not need to be considered again in the consenting process*.⁵⁴

51 DESNZ, [Overarching National Policy Statement for Energy \(EN-1\)](#) (April 2025), para 3.3.78.

52 DESNZ, [Overarching National Policy Statement for Energy \(EN-1\)](#) (April 2025), para 3.3.78.

53 DESNZ, [Overarching National Policy Statement for Energy \(EN-1\)](#) (April 2025), para 3.3.79.

54 DESNZ, [Overarching National Policy Statement for Energy \(EN-1\)](#) (April 2025), para 3.3.79.

36. It is clear from the proposed guidance that the “strategic parameters” for new electricity network infrastructure, to be determined by the CSNP, will be highly important. Responses to our call for evidence stressed that these must be “clearly defined and understood”.⁵⁵ When we asked him about this, Julian Leslie explained that, through the CSNP, NESO “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”.⁵⁶ Charlotte Mitchell, Chief Planning Officer at National Grid Electricity Transmission, echoed this and explained that, after the creation of the CSNP, Transmission Owners would “engage communities in the detailed design of the proposals around routing and siting of the projects”.⁵⁷
37. In the CSNP high-level methodology principles,⁵⁸ NESO detailed the “strategic parameters” of new electricity transmission infrastructure precisely, as including the boundary capability provided,⁵⁹ whether the reinforcement is onshore or offshore, HVDC or AC,⁶⁰ mainly overhead lines or underground cables, its spatial envelope,⁶¹ and connection to the network.⁶² By contrast, we heard concern that the vague and interchanging references in paragraph 3.3.79 of EN-1 to the “strategic parameters” and the “strategic solution” “could lead to open interpretation and challenge through the consents process”.⁶³ SP Energy Networks suggested that, at the moment, referring to the “strategic corridors”, rather than to the “strategic parameters”, would better reflect current discussions about the

55 SP Energy Networks ([NPEO038](#)).

56 [Q93](#) [Julian Leslie].

57 [Q93](#) [Charlotte Mitchell].

58 NESO, [Centralised Strategic Network Plan \(CSNP\): High-level methodology principles](#) (December 2024).

59 This is a reference to the additional capability which the reinforcement will provide. A boundary divides the electricity transmission system into two parts. The boundary capability is the greatest power transfer possible without breaching any limitations imposed by the National Electricity Transmission System Security and Quality of Supply Standards. NESO, [Centralised Strategic Network Plan \(CSNP\): High-level methodology principles](#) (December 2024), pp 28, 37 and 64.

60 HVDC refers to direct current (DC) power transmission at voltages over 110 kilovolts (kV). AC refers to alternating current, “a type of electrical current, in which the direction of the flow of electrons switches back and forth at regular intervals or cycles”. NESO, [Centralised Strategic Network Plan \(CSNP\): High-level methodology principles](#) (December 2024), pp 64 to 66.

61 “The strategic envelope is a broad study area which may cover multiple indicative option variations and their connection in relation to the MITS” (main integrated transmission system): NESO, [Centralised Strategic Network Plan \(CSNP\): High-level methodology principles](#) (December 2024), pp 25 and 28.

62 NESO, [Centralised Strategic Network Plan \(CSNP\): High-level methodology principles](#) (December 2024), pp 28 and 68.

63 SP Energy Networks ([NPEO038](#)).

CSNP between NESO, Transmission Owners and other stakeholders.⁶⁴ In the longer term, they proposed that the National Policy Statements adopt the definition of “strategic parameters” eventually used in the CSNP, with “clear and unambiguous language” to ensure that “decision makers are absolutely clear as to what is being endorsed”.⁶⁵

- 38.** The CSNP will introduce a three-year network planning cycle and determine which options should progress to detailed design and delivery. The Government’s proposed guidance in EN-1, paragraph 3.3.80, says the following about how the CSNP will inform planning decisions and network design processes (*emphasis added*):

Precise routing and siting decisions will need to be made as project design is refined and in accordance with appropriate surveys and consultations. Where indicative routes are shown in the CSNP, these are subject to change and should not be considered fixed for planning purposes. However, we expect that the final proposed route would be contained within the strategic parameters defined in the CSNP.⁶⁶

However, it is not yet clear whether the CSNP will in fact include “indicative routes”. Julian Leslie and Charlotte Mitchell did not state this in their oral evidence.⁶⁷ NESO has suggested that the CSNP may include one or more “indicative options” but maintains that these will be confirmed through detailed design and local engagement.⁶⁸ SP Energy Networks explained to us that “indicative routes” are typically understood to mean a route defined through “detailed design optioneering” and community consultation, which is not the intended purpose of the CSNP.⁶⁹

- 39.** Some witnesses suggested that, in endorsing the CSNP, the National Policy Statements should allow for adjustments to be made to the “strategic parameters” for electricity transmission projects at a later stage of the development process. For example, Ali Leeder explained that this might be justified where a better route outside the “strategic parameters” is identified through environmental surveys or consultation: for example, a route which is less harmful or more acceptable to the community.⁷⁰ This important consideration raises the question of whether alternative options ruled out by NESO in creating the CSNP can be reconsidered if new information comes to light.

64 SP Energy Networks ([NPE0038](#)).

65 SP Energy Networks ([NPE0038](#)).

66 DESNZ, [Overarching National Policy Statement for Energy \(EN-1\)](#) (April 2025), para 3.3.80.

67 See para 36.

68 NESO, [Centralised Strategic Network Plan \(CSNP\): High-level methodology principles](#) (December 2024), pp 42 - 43.

69 SP Energy Networks ([NPE0038](#)).

70 [Q45](#).

40.

CONCLUSION

We welcome the decision to endorse the Centralised Strategic Network Plan (CSNP) in the National Policy Statements. However, we are concerned that the proposed guidance in paragraphs 3.3.78 to 3.3.80 of EN-1 is not clear enough about what, precisely, it is from the CSNP that is being endorsed. This must be unambiguous, to avoid unnecessary argument about the issue during the development consent process.

41.

RECOMMENDATION

The Government should review and, if necessary, amend the proposed guidance endorsing the CSNP in paragraphs 3.3.78 to 3.3.80 of EN-1, to make the language more consistent, unambiguous, and more in keeping with current understandings of the intended purpose of the CSNP. This may involve:

- reviewing the reference to the CSNP displaying “indicative routes” in paragraph 3.3.80;
- removing the reference in paragraph 3.3.79 to a “strategic solution”, an undefined term distinct from “strategic parameters”; and/or
- replacing “strategic parameters” with “strategic corridors” until the CSNP is complete and a more precise definition can be adopted.

42.

RECOMMENDATION

The National Policy Statements should clarify that adjustments may be made to the “strategic parameters” for new electricity transmission infrastructure set out in the Centralised Strategic Network Plan where this is justified following detailed design development, community consultations or environmental surveys.

Whether it is too early to endorse strategic frameworks still in development

43. We heard from several witnesses that it is too early to endorse the SSEP and the CSNP in the National Policy Statements, given that both plans are still in development. For example, Isobel Morris, Senior Policy Officer in Energy at the RSPB, in principle supported embedding strategic plans in the National Policy Statements but explained that she could not assess the environmental impacts of doing so until the plans are finalised.⁷¹ Similarly, National Grid argued that, given their nascency, endorsement of the SSEP

71 [Q3](#) [Isobel Morris].

and the CSNP in national planning policy should only become official when these plans are finalised and have undergone public consultation and environmental assessments.⁷² They suggested that the Government use the streamlined procedure for making changes to the National Policy Statements, being introduced in the Planning and Infrastructure Bill, to review the proposed endorsement of these strategic plans when they are finalised.⁷³ On behalf of NESO, Julian Leslie agreed with this approach.⁷⁴ Likewise, Sir Bernard Jenkin MP, Chair of OffSET,⁷⁵ argued that the National Policy Statements should either be revised once these strategic frameworks are in place or “include a clear mechanism for integrating future strategic policies as they are adopted”.⁷⁶

44. NESO is also responsible for producing the Electricity Transmission Design Principles (ETDP), new guidance intended to clarify the types of assets which should be used in different environments and when visual mitigations such as underground or offshore routes are appropriate.⁷⁷ The ETDP are also at an early stage of development: Julian Leslie explained to us that NESO is currently “going through the fine detail” and is planning to “consult extensively” on them over the summer.⁷⁸
45. The Government’s proposed updates to EN-5 also endorse the ETDP by providing that, when they are published, “developers should have regard to the ETDP as relevant”, in addition to existing guidance.⁷⁹ However, the above concerns, that it may be too early for endorsement of strategic plans to become official, apply with equal force to the ETDP. National Grid and SP Energy Networks both strongly advised that the ETDP should not have any endorsement in the National Policy Statements until their development is fully complete and the final version is published. This view, that endorsement of the ETDP now would be premature, was also shared by individuals who responded to our call for evidence.⁸⁰

72 National Grid ([NPE0041](#)); [Qq86 and 98](#) [Charlotte Mitchell]. These assessments include a Strategic Environmental Assessment and a Habitats Regulation Assessment.

73 National Grid ([NPE0041](#)); [Qq86 and 98](#) [Charlotte Mitchell].

74 [Q111](#) [Julian Leslie].

75 The Offshore Electricity Grid Task Force, “a cross-party group of MPs who are campaigning for more acceptable and affordable alternatives to new High Voltage Alternative Current Pylons, such as the Norwich to Tilbury proposal”: Sir Bernard Jenkin MP ([NPE0033](#)).

76 Sir Bernard Jenkin MP ([NPE0033](#)).

77 [Electricity Networks Commissioner’s principal areas of recommendation](#) (2023); [Electricity Networks Commissioner – Companion Report Findings and Recommendations](#) (2023), p 23; DESNZ, [National Policy Statement for Electricity Networks Infrastructure \(EN-5\)](#) (April 2025), para 2.9.20.

78 [Q108](#).

79 DESNZ, [National Policy Statement for Electricity Networks Infrastructure \(EN-5\)](#) (April 2025), para 2.9.20.

80 Mr Andrew Roberts ([NPE0015](#)).

46.

RECOMMENDATION

Endorsement of the Strategic Spatial Energy Plan, the Centralised Strategic Network Plan and the Electricity Transmission Design Principles in the National Policy Statements should not become official until these plans are finalised and have completed public consultation and environmental assessments. At that stage, the Government should review the proposed policy wording to do so and should implement any necessary changes through the streamlined procedure for amending the National Policy Statements being introduced in the Planning and Infrastructure Bill.

Speeding up electricity distribution infrastructure delivery

47. A further issue concerning the strategic framework for energy infrastructure planning raised with us was the types of electricity network infrastructure that should be consented under the Nationally Significant Infrastructure Projects (NSIP) regime, as opposed to other statutory frameworks.
48. Lawrence Slade, Chief Executive of the Energy Networks Association, suggested that some types of 132 kilovolt (kV) electricity distribution infrastructure ought to be entirely removed from the NSIP regime and instead consented under section 37 of the Electricity Act 1989.⁸¹ He specifically highlighted 132kV wood poles.⁸² We heard that the rationale for doing so is that the NSIP regime is an “overly complex and disproportionate process” for some types of electricity distribution infrastructure and that such reform would allow “more freedom and speed” to deliver the volume needed to achieve the Government’s energy targets.⁸³

CONCLUSION

We have not had the opportunity to consider the issue in detail. However, we believe that there is merit to these arguments, given that electricity distribution infrastructure is strategically important and can be much smaller in scale than transmission infrastructure.

81 [Qs112 and 129](#).

82 [Q112](#); Energy Networks Association ([NPE0044](#)).

83 [Q112](#) [Lawrence Slade]; Energy Networks Association ([NPE0044](#)).

49.

RECOMMENDATION

The Government should review whether some types of electricity distribution infrastructure should be removed from the Nationally Significant Infrastructure Projects regime and instead consented under section 37 of the Electricity Act 1989, to speed up delivery critical to Clean Power by 2030. These may include 132kV wood poles.

3 The role of community engagement in building public support for strategic plans

50. Public consultation and community engagement were important themes within the evidence that we received. Many witnesses underlined that public support will be essential to the success of both the Strategic Spatial Energy Plan (SSEP) and the Centralised Strategic Network Plan (CSNP).
51. Common sense would suggest that thorough public consultation is a prerequisite for strategic plans to have sufficient authority to fulfil their central role in the Government’s new framework for energy infrastructure planning. Ofgem noted, in their approval of the National Energy System Operator (NESO)’s SSEP Methodology, that “securing buy-in from stakeholders through the public consultations you are planning will be crucial to building acceptability”.⁸⁴ Graham Gunby, National Infrastructure Planning Manager at Suffolk County Council, emphasised that open consultation will be necessary to ensure that people are not left “mystified” as to why their local area has been chosen for energy infrastructure.⁸⁵ Regarding the CSNP, Suffolk County Council stressed that “it will be critical” for consultations “to include a process of geographical focus on areas, and communities, that are likely to host the proposed strategic connection solutions”.⁸⁶ Only then can discussion of the “strategic solution” chosen in the plan, and possible alternatives, be “reasonably and appropriately removed from the examination of individual projects”.⁸⁷
52. On behalf of NESO, Julian Leslie explained to us that earlier engagement with local communities is one of the central purposes of the SSEP and the CSNP. It is hoped that consulting on “the general principles and strategic direction” of energy infrastructure development, at a much earlier stage, will allow the development consent process to be more focused on decisions

84 Ofgem, [Approval of the Strategic Spatial Energy Plan Methodology](#) (May 2025).

85 [Q45](#).

86 Suffolk County Council ([NPE0020](#)).

87 Suffolk County Council ([NPE0020](#)).

about individual projects.⁸⁸ We heard from Graham Gunby that this would be very useful in respect of electricity network infrastructure.⁸⁹ Our evidence indicates that presenting communities with only a single development proposal at a late stage of the process can lead to confusion, distress, opposition and resentment, particularly if alternative options appear to have been ruled out without explanation.⁹⁰ This is especially the case in relation to overhead lines for electricity network infrastructure.⁹¹

53. The need for more constructive discussions with communities about the need for new energy infrastructure, potential options to deliver this, and the trade-offs involved, was apparent from evidence to our predecessor Committee's inquiry, *A flexible grid for the future*, in 2023.⁹² Sharon Darcy, Chair of the Linear Infrastructure Planning Panel, explained that community engagement is often "too technical, too late" and starts from the premise of opposition.⁹³ Calls for an information campaign, "to make the case for new renewable energy and grid infrastructure",⁹⁴ have further highlighted these points.⁹⁵ The UK Energy Research Centre underlined the significant challenges that arise in relation to community engagement over electricity network infrastructure:

88 [Q128](#) [Julian Leslie].

89 [Q54](#) [Graham Gunby].

90 See, for example Sir Bernard Jenkin MP ([NPE0033](#)); Campaign to Protect Rural England (CPRE) Warwickshire Branch ([NPE0037](#)); Ms Monica Lawrence ([NPE0014](#)); Mrs Sallie Hollingsworth ([NPE0022](#)); and PS Lang ([NPE0012](#)).

91 See, for example Sir Bernard Jenkin MP ([NPE0033](#)); Ms Monica Lawrence ([NPE0014](#)); PS Lang ([NPE0012](#)) and written evidence for the Committee's inquiry, *A flexible grid for the future*, August 2023: Essex Suffolk Norfolk Pylons ([GRI0010](#)); Mrs K Fisher ([GRI0012](#)); Suffolk County Council ([GRI0039](#)); East Anglian Alliance of Amenity Groups ([GRI0049](#)); and Suffolk Energy Action Solutions ([GRI0083](#)).

92 Written evidence for the Committee's inquiry, *A flexible grid for the future*, August 2023: see, for example Essex Suffolk Norfolk Pylons ([GRI0010](#)); Mrs K Fisher ([GRI0012](#)); Sharon Darcy ([GRI0026](#)); the Centre for Sustainable Energy, Regen, and Town and Country Planning Association ([GRI0033](#)); Suffolk County Council ([GRI0039](#)); East Anglian Alliance of Amenity Groups ([GRI0049](#)); RenewableUK ([GRI0064](#)); Statkraft ([GRI0079](#)); Suffolk Energy Action Solutions ([GRI0083](#)); Planning and Environment Bar Association ([GRI0097](#)); and Estelle Dehon KC ([GRI0098](#)).

93 Written evidence for the Committee's inquiry, *A flexible grid for the future*, Sharon Darcy ([GRI0026](#)), August 2023.

94 RenewableUK, Aldersgate Group and CPRE, "[Electric dreams: how the planning system can help deliver the UK's low-carbon energy](#)" (November 2024), p 5.

95 RenewableUK, Aldersgate Group and CPRE, "[Electric dreams: how the planning system can help deliver the UK's low-carbon energy](#)" (November 2024), p 5; [Letter from Electricity Networks Commissioner to Secretary of State for Energy Security and Net Zero](#) (August 2023), p 9; Energy Systems Catapult, [Electricity Networks Commissioner – Companion Report Findings and Recommendations](#) (June 2023), pp 45 to 46; Sharon Darcy ([GRI0026](#)); Statkraft ([GRI0079](#)); SSE ([GRI0091](#)); and the Energy Systems Catapult ([GRI0107](#)).

Many campaigns argue for offshore or underground routes... Increased costs to ameliorate concerns of affected residents will be borne by all consumers, most of whom will be unaffected by the impact of particular transmission routes.⁹⁶

CONCLUSION

The complex judgments involved in evaluating different options for electricity network infrastructure not only raise a strong argument for settling these strategic considerations at an earlier stage, but also heighten the need for affected communities to be involved in those decisions.

Social research

54. Social research into community views of electricity transmission infrastructure, published in 2024, highlighted that, when given relevant information and the opportunity to do so, many members of the public are open to reconsidering their initial preferences against alternative options.⁹⁷ The research, commissioned by the Department for Energy Security & Net Zero, was based on 2,359 survey responses from randomly selected households and workshops with around 11–12 community representatives in three case study areas.⁹⁸ The majority of survey participants initially reported a preference for underground and offshore routes (74% and 69% respectively).⁹⁹ However, when they were informed of the potential environmental impacts of those options, these numbers dropped dramatically. Only 33% of participants remained in favour of underground routes and only 26% remained in favour of offshore routes.¹⁰⁰ Similarly, after

96 Written evidence for the Committee's inquiry, *A flexible grid for the future*, UK Energy Research Centre ([GRI0061](#)), pp 6 to 7, August 2023.

97 BMG Research for the Department for Energy Security and Net Zero (DESNZ), [Community Benefits for Electricity Transmission Network Infrastructure – Social Research](#) (March 2024).

98 BMG Research for DESNZ, [Community Benefits for Electricity Transmission Network Infrastructure – Social Research](#) (March 2024), pp 5 and 10–14. These case study areas were three regions where there were proposals for new electricity transmission infrastructure: (i) Lincolnshire County; (ii) Inverness/Keith (including Keith and Cullen, Speyside Glenlivet, Forres, Nairn and Cawdor, Aird and Loch Ness, and all Inverness wards); and (iii) East Suffolk, Dover, and Thanet local authorities.

99 BMG Research for DESNZ, [Community Benefits for Electricity Transmission Network Infrastructure – Social Research](#) (March 2024), pp 6 and 28.

100 BMG Research for DESNZ, [Community Benefits for Electricity Transmission Network Infrastructure – Social Research](#) (March 2024), pp 6 and 28.

being informed that electricity bills fund the cost of building transmission infrastructure, 34% said that they were unwilling to add any additional costs to their bills to fund alternatives to overhead lines.¹⁰¹

NESO's proposed strategies for public consultation

Strategic Spatial Energy Plan

55. In May, NESO published its final methodology for the SSEP,¹⁰² approved by both the Government and Ofgem.¹⁰³ The methodology identified transparent engagement with societal groups as a central “pillar” of the SSEP, crucial to its development and refinement, and outlined how NESO plans achieve this.¹⁰⁴ Details included the following:
- a. There will be an Expert Advisory Group composed of five working groups, including an Environment Working Group, a Land Use Spatial Planning Working Group, and a Societal Interest Working Group.¹⁰⁵
 - b. During the development of the SSEP, NESO will engage with “societal forums” representing 14 sectors or interest groups, with representatives on the Societal Interest Working Group.¹⁰⁶ The purpose of the societal forums is to contribute to the evolution of the SSEP by providing insights and feedback.¹⁰⁷ The Societal Interest Working Group will collate views across societal forums and advise on this engagement activity.¹⁰⁸
 - c. The UK Energy Secretary will select a “pathway” to be used for formal consultation on the draft SSEP, in which NESO will engage with the same Expert Working Groups, sectors and interest groups as it plans

101 BMG Research for DESNZ, [Community Benefits for Electricity Transmission Network Infrastructure – Social Research](#) (March 2024), pp 6, 15 and 30.

102 NESO, [Strategic Spatial Energy Plan: Methodology](#) (May 2025).

103 Department for Energy Security and Net Zero, [NESO Strategic Spatial Energy Plan methodology: letter from Secretary of State to NESO](#) (May 2025); Ofgem, [Approval of the Strategic Spatial Energy Plan Methodology](#) (May 2025).

104 NESO, [Strategic Spatial Energy Plan: Methodology](#) (May 2025), pp 14 to 16.

105 NESO, [Strategic Spatial Energy Plan: Methodology](#) (May 2025), p 19.

106 NESO, [Strategic Spatial Energy Plan: Methodology](#) (May 2025), p 22. These 14 sectors and interest groups are older people; farming and land use; cost of living; businesses; charities and third sector; tourism and leisure; environment; housing; people with disabilities; sea communities; visual impact; transport; young people; and large energy users: NESO, [Strategic Spatial Energy Plan: Methodology appendices](#) (May 2025), p 5.

107 NESO, [Strategic Spatial Energy Plan: Methodology appendices](#) (May 2025), p 6.

108 NESO, [Strategic Spatial Energy Plan: Methodology](#) (May 2025), p 22.

to during the development of the plan.¹⁰⁹ One purpose of formal consultation will be to re-test societal acceptance of the necessary trade-offs in the draft SSEP.¹¹⁰ NESO suggested that consultation methods could include opinion surveys; targeted focus groups; outreach to prominent interest and campaign groups; webinars and “stakeholder meetings”; and visual representations of the plan as well as textual descriptions.¹¹¹

- d. Statutory and public consultation on the environmental effects of the draft plan, through the Strategic Environmental Assessment (SEA) Environmental Report, the Habitats Regulation Assessment (HRA) Report to Inform and the Marine Conservation Zone (MCZ) Assessment Report.¹¹²
- e. Engagement with communities in the host areas identified in the draft SSEP as “best suited for energy infrastructure development”.¹¹³ NESO stated that it will use the governance structures and forums established during the development of the SSEP to help host communities to participate in the decision-making process.¹¹⁴ It also committed to “facilitate conversations among political, societal, industry and community stakeholders” and “remain reactive and responsive to community and industry needs, continually evolving our engagement activities”.¹¹⁵

Centralised Strategic Network Plan

- 56. To be as efficient as possible, NESO has proposed to replicate, for the CSNP, the methodology and stakeholder engagement strategy developed for the SSEP, by building upon existing relationships.¹¹⁶ NESO’s high-level methodology principles for the CSNP, published in December, committed to using a range of communication methods for stakeholder engagement, including “roundtables, workshops, events, online seminars, forums, and surveys”.¹¹⁷ The document committed to five “engagement principles” to

109 NESO, [Strategic Spatial Energy Plan: Methodology](#) (May 2025), pp 104 to 105.

110 NESO, [Strategic Spatial Energy Plan: Methodology](#) (May 2025), p 105.

111 NESO, [Strategic Spatial Energy Plan: Methodology](#) (May 2025), pp 103 to 105.

112 NESO, [Strategic Spatial Energy Plan: Methodology](#) (May 2025), p 106.

113 NESO, [Strategic Spatial Energy Plan: Methodology](#) (May 2025), p 105.

114 NESO, [Strategic Spatial Energy Plan: Methodology](#) (May 2025), p 106.

115 NESO, [Strategic Spatial Energy Plan: Methodology](#) (May 2025), p 106.

116 Q90 [Julian Leslie]; NESO, [Centralised Strategic Network Plan \(CSNP\): High-level methodology principles](#) (December 2024), pp 11 and 13.

117 NESO, [Centralised Strategic Network Plan \(CSNP\): High-level methodology principles](#) (December 2024), p 11.

ensure that stakeholder engagement is timely and transparent; proactive; meaningful; coordinated with other strategic planning activities; and tailored to different needs.¹¹⁸

Oral evidence on timelines and community engagement strategies

57. Julian Leslie outlined to us NESO’s planned timelines for the creation of the SSEP and the CSNP. NESO expects to present the SSEP pathways to the Secretary of State by the end of 2025, to allow time for a 10-month consultation and engagement process on the final draft.¹¹⁹ It will consult in more detail on the CSNP methodology in summer 2025.¹²⁰
58. The timeline of “SSEP milestones” in NESO’s SSEP Methodology provides that the draft SSEP, the SEA Environmental Report, the HRA Report to Inform and the MCZ Assessment Report will be published for public consultation in the second quarter of 2026.¹²¹ As noted above, Julian Leslie told us that NESO has “built in a 10-month engagement and consultation process on the final SSEP”.¹²² If that is the case, public consultation would continue until at least January 2027. Yet NESO is due to publish the final SSEP by the end of 2026.¹²³

CONCLUSION

It would be regrettable if this timeline meant that public engagement activities taking place towards the end of the consultation period have less, or even no, impact on the final outcome.

59. We asked Julian Leslie how NESO intends to overcome the common problem of community consultation failing to raise sufficient awareness of proposed developments at an early stage in the process.¹²⁴ He suggested that, rather than consulting individuals directly, NESO will mainly engage with representative organisations, such as Citizens Advice, environmental groups, consumer groups and local community groups.¹²⁵ This is because

118 NESO, [Centralised Strategic Network Plan \(CSNP\): High-level methodology principles](#) (December 2024), pp 12 to 13.

119 [Q90](#).

120 [Q90](#).

121 NESO, [Strategic Spatial Energy Plan: Methodology](#) (May 2025), p 12.

122 [Q90](#).

123 NESO, [Strategic Spatial Energy Plan: Methodology](#) (May 2025), p 12

124 [Q91](#) [Chair].

125 [Qq90–92](#).

the SSEP is “a national plan on a national basis”.¹²⁶ However, he maintained that NESO is “reaching as far and wide” as they can and stressed that they host webinars and publish information in a transparent and open way.¹²⁷

60. CONCLUSION

The Strategic Spatial Energy Plan (SSEP), the Centralised Strategic Network Plan (CSNP) and the Land Use Framework (LUF) are valuable opportunities to build greater public understanding of the need for energy infrastructure and the trade-offs involved in choosing between different options and locations, at an early stage of the development process.

61. CONCLUSION

We welcome the National Energy System Operator (NESO)’s ambition for meaningful and comprehensive engagement with diverse communities, economic interests and societal groups throughout the development of the SSEP and the CSNP. At the very least, we expect the use of surveys, focus groups, roundtables, stakeholder meetings, events and webinars to engage with people directly. It is imperative that public consultation over these plans includes targeted engagement with communities who will see large volumes of infrastructure, clusters of projects, or energy infrastructure in their locality for this first time, as set out in the SSEP methodology.¹²⁸ Engagement with these communities should raise awareness of the infrastructure which they are likely to see in the years to come.

62. CONCLUSION

At this early stage, we have yet to see sufficient evidence of NESO’s ambitions for societal engagement and public consultation being put into practice in the development of the SSEP and the CSNP. In the autumn, we expect to hear further details of: (i) NESO’s consultation strategy; and (ii) how the societal forums and stakeholder working groups have been contributing to the development of these plans.

63. RECOMMENDATION

To protect the time allocated for public engagement and consultation on the draft SSEP, without compromising NESO’s deadline to publish the final SSEP in December 2026, there can be no delay to:

- NESO’s presentation of the SSEP pathway options to the Secretary of State;

¹²⁶ [Q92](#) [Julian Leslie].

¹²⁷ [Q91](#) [Julian Leslie].

¹²⁸ NESO, [Strategic Spatial Energy Plan: Methodology appendices](#) (May 2025), pp 8 to 9.

- The Secretary of State's selection of a pathway option; or
- NESO's preparation for the consultation and community engagement activities.

The draft SSEP should be published for consultation by the end of February 2026 at the very latest and earlier if possible. The Secretary of State should decide upon the chosen SSEP pathway in sufficient time to enable this.

4 Nature positive approaches to energy infrastructure

The environmental impacts of Critical National Priority status

64. The Government's proposed updates to the National Policy Statements reinforce the presumption of consent for low carbon infrastructure with Critical National Priority (CNP) status. This policy provides that the overarching need for CNP infrastructure must be given substantial weight and will in general outweigh any other residual impacts, including environmental impacts, not capable of being addressed by application of the mitigation hierarchy.¹²⁹ The Government proposes to update the policy with new guidance that the need to generate renewable electricity should take precedence over mitigating environmental impacts (*emphasis added*):

Applicants must apply the mitigation hierarchy and demonstrate that it has been applied. They should also seek the advice of the appropriate SNCB or other relevant statutory body when undertaking this process. Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated. *Measures that result in a material reduction in generation capacity for CNP infrastructure are unlikely to be considered to be appropriate as mitigation.*¹³⁰

65. The new guidance, in italics, appears to provide that a proposed measure to mitigate environmental harm is unlikely to be acceptable if it would reduce the generation capacity of a renewable energy project. We have heard grave concerns that this change will discourage mitigation that would otherwise produce significant environmental benefits at the expense of a

129 Department for Energy Security & Net Zero (DESNZ), [Overarching National Policy Statement for Energy \(EN-1\)](#) (April 2025), paras 3.3.66 and 4.2.19. The mitigation hierarchy is the concept that adverse environmental impacts from development should first be avoided, then reduced, then mitigated and, only if none of these measures are possible, compensated: p 200.

130 DESNZ, [Overarching National Policy Statement for Energy \(EN-1\)](#) (April 2025), para 4.2.24.

small reduction in generation capacity. Isobel Morris gave the example of removing the corner of a very large offshore wind farm to preserve an important feeding route for seabirds at risk of extinction, such as puffins.¹³¹ Altering the layout of a development or reducing the number of turbines in specific areas can be extremely effective in supporting the co-existence of nature and renewable energy infrastructure, on land and at sea.¹³² The RSPB stressed that it is “standard practice for wind farms to plan for the ‘upper limit’ of turbines in early stages, with a widely-held presumption that this will be reduced once more environmental data has been obtained”.¹³³ Likewise, Chandni Ruparelia suggested that adjustments to the boundary of a proposed site for the benefit of the environment are also common in the solar industry, even where this reduces generation capacity:

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.¹³⁴

Ali Leeder, Director at Aeos Infrastructure Planning, also confirmed that it is not uncommon for developers to accept reductions in electricity output as justified by environmental considerations.¹³⁵ Moreover, the policy could also deter innovative research into ways to mitigate environmental impacts whilst minimising electricity generation losses. For example, these include the use of predictive models to enhance the accuracy of bird migration forecasts and optimise the temporary curtailment of wind turbines to reduce bird collisions.¹³⁶

- 66.** Concerns about the effects of discouraging the mitigation of environmental impacts have been especially pronounced in relation to offshore wind.¹³⁷ The RSPB explained that, despite the international importance of the UK for global seabird populations, in the last 20 years seabirds in the UK have declined by 62% and by 70% in Scotland.¹³⁸ There are many reasons for this decline. However, we heard that offshore wind could be a contributing factor, due to collisions with rotating blades, the obstruction of routes to

131 [Q14](#).

132 RSPB ([NPE0043](#)).

133 RSPB ([NPE0043](#)).

134 [Q135](#) [Chandni Ruparelia].

135 [Q52](#).

136 BirdLife International, [Bird curtailment in offshore wind farms: Towards a coherent sea-basin approach to mitigate collision risk for birds](#) (June 2024).

137 [Q14](#). [Isobel Morris]; RSPB ([NPE0043](#)).

138 RSPB ([NPE0043](#)).

feeding grounds, reduced hunting areas and disturbance.¹³⁹ In England, the Government has set legally binding biodiversity targets under the Environment Act 2021 to halt overall species decline by 2030 and reduce the risk of species extinction by 2042.¹⁴⁰ Scotland, Wales and Northern Ireland all have their own biodiversity targets and strategies.¹⁴¹ These are in addition to the UK's international commitments relating to biodiversity.¹⁴²

67. On the other hand, others have suggested the word “material” in paragraph 4.2.24 of EN-1, cited at the beginning of this chapter, imposes limits on the types of mitigations which are unlikely to be considered appropriate. These included Ali Leeder, who nonetheless agreed that the meaning of “material” would “certainly be tested” in examinations and legal proceedings. She explained that, in her experience, “there are already lots of discussions that go on over the extent to which a reduction of output is justified due to environmental considerations”.¹⁴³ Although it would not completely rule out mitigations that reduce generation capacity, the policy leaves significant room for doubt as to whether they would be justified.

68. **CONCLUSION**

We have concerns about the effect of the proposed new policy, in paragraph 4.2.24 of EN-1, that measures to mitigate the environmental impacts of Critical National Priority (CNP) infrastructure are “unlikely to be considered to be appropriate” if they “result in a material reduction in generation capacity”. The word “material” is ambiguous. We are not persuaded that the Government has sufficiently considered how this change of policy might affect the achievement of biodiversity targets in the UK or those adopted by the devolved administrations.

139 RSPB ([NPE0043](#)).

140 [Environment Act 2021](#), ss 1, 3, (1) and 143(1); [The Environmental Targets \(Biodiversity\) \(England\) Regulations 2023](#), SI 2023/91. See also: Elena Ares, [Biodiversity loss: The UK's international obligations](#) (House of Commons Library, July 2024).

141 Scottish Government / Riaghaltas na h-Alba, [Scottish Biodiversity Strategy to 2045](#) (November 2024); [Biodiversity: delivery plan 2024 to 2030](#) (November 2024); Llywodraeth Cymru / Welsh Government, [Introduction of the Environment \(Principles, Governance and Biodiversity Targets\) \(Wales\) Bill](#) (June 2025); Senedd Cymru / Welsh Parliament, [Environment \(Principles, Governance and Biodiversity Targets\) \(Wales\) Bill](#) (May 2025); Department of Agriculture, Environment and Rural Affairs / An Roinn Talmhaíochta, Comhshaoil agus Gnóthaí Tuaithe / Department o' Fairmin, Environment an' Kintra Matthers, [Biodiversity Strategy for Northern Ireland to 2020](#) (September 2021).

142 For example, these include the Kunming-Montreal Global Biodiversity Framework, agreed in December 2022 at the fifteenth meeting of the conference of the parties to the Convention on Biological Diversity: Elena Ares, [Biodiversity loss: The UK's international obligations](#) (House of Commons Library, July 2024).

143 [Q52](#).

69.

CONCLUSION

National planning policy for CNP infrastructure should strongly encourage innovative strategies to reduce environmental impacts and, where appropriate, adjustments to site boundaries, layouts or the volume of electricity generation in specific areas for this purpose.

70.

RECOMMENDATION

The Government should review whether the following sentence in EN-1, paragraph 4.2.24, is consistent with its own domestic and international biodiversity commitments, as well as those of the devolved administrations: “Measures that result in a material reduction in generation capacity for CNP infrastructure are unlikely to be considered to be appropriate as mitigation.”

Integrating environmental protection into infrastructure development

71. In chapters 2 and 3 we explained our support for a more strategic approach to energy infrastructure development; our view that national planning policy should give effect to strategic plans more clearly; and our recommendation that these plans must be subject to thorough consultation.
72. The Government and the National Energy System Operator (NESO) have confirmed that the Strategic Spatial Energy Plan (SSEP) and the Centralised Strategic Network Plan (CSNP) will be subject to a Strategic Environmental Assessment (SEA), a Habitats Regulation Assessment (HRA), a Marine Conservation Zone (MCZ) assessment in England and Wales and a Marine Protected Areas (MPA) assessment in Scotland.¹⁴⁴ NESO has already published details of its expected timelines and strategies for these assessments.¹⁴⁵ This use of the Government’s new strategic framework for energy infrastructure planning to strengthen and enhance environmental protection was welcomed across the evidence we that received.
73. Isobel Morris told us that “a strategic spatial approach is vital to saving nature when it comes to planning for energy”.¹⁴⁶ She referred to a scientific study published by the RSPB in the last year which found that deploying

144 DESNZ, [Strategic Spatial Energy Plan: Commission to the National Energy System Operator](#) (October 2024), pp 4 and 20; NESO, [Strategic Spatial Energy Plan: Methodology](#) (May 2025), p 7; NESO, [Centralised Strategic Network Plan \(CSNP\): High-level methodology principles](#) (December 2024), pp 3, 5, 49, 55 and 57.

145 NESO, [Strategic Spatial Energy Plan: Methodology](#) (May 2025), pp 28 to 36; NESO, [Centralised Strategic Network Plan \(CSNP\): High-level methodology principles](#) (December 2024), pp 5 to 60.

146 [Q3](#). See also: Royal Society for Protection of Birds (RSPB) ([NPE0034](#)).

ambitious levels of solar (90 GW) and onshore wind (35 GW) would require only 2.6% of UK land.¹⁴⁷ Importantly, this could be achieved whilst avoiding ecologically sensitive areas (including national parks) and Best and Most Versatile agricultural land, minimising losses to biodiversity and food production.¹⁴⁸ Her support for a more strategic approach to aligning nature protection with accelerating renewable energy development was a rare point of consensus with Sam Richards, CEO of Britain Remade. Questioning whether the current framework sufficiently protects the environment and halts biodiversity decline,¹⁴⁹ he called for a new approach to environmental protection which is more strategic and “front-loads” some of the concerns.¹⁵⁰ He suggested that this could allow the UK to build the energy infrastructure that it needs whilst directing more private sector funding into nature restoration.¹⁵¹

74. The Government itself recognised the value of integrating the pursuit of biodiversity and climate objectives in its Clean Power 2030 Action Plan:

The real opportunity available to the UK is to deliver clean power by 2030 in a nature positive way, such as rewetting lowland peat soils at the same time as constructing new solar farms or creating new wildlife corridors alongside or underneath linear energy infrastructure.

This approach is not so much about “balancing” energy and the environmental needs; it’s about integrating them. It’s about rebuilding our natural infrastructure at the same time as building the new energy infrastructure we need.¹⁵²

Our evidence demonstrates wide support for this objective. Solar Energy UK told us that “the solar industry remains committed to placing land management and biodiversity enhancement at the core of project development”.¹⁵³ We heard that this is evidenced by several studies by Solar Energy UK and independent experts, including Lancaster University and the University of York, which have reinforced “the industry’s understanding

147 [Qq18–19](#); RSPB ([NPE0034](#)). See: Joshua P Copping, Rob H Field, Richard B Bradbury, Lucy J Wright and Tom Finch, “[Ambitious onshore renewable energy deployment does not exacerbate future UK land-use challenges](#)”, Cell Reports Sustainability, Vol 1 Issue 8, 23 August 2024, 1 and RSPB, “[Exploring the impact of renewables on future land use challenges](#)”, 23 August 2024.

148 [Qq18–19](#); RSPB ([NPE0034](#)). See: Joshua P Copping, Rob H Field, Richard B Bradbury, Lucy J Wright and Tom Finch, “[Ambitious onshore renewable energy deployment does not exacerbate future UK land-use challenges](#)”, Cell Reports Sustainability, Vol 1 Issue 8, 23 August 2024, 1 and RSPB, “[Exploring the impact of renewables on future land use challenges](#)”, 23 August 2024.

149 [Q5](#).

150 [Q16](#).

151 [Q16](#).

152 DESNZ, [Clean Power 2030 Action Plan](#) (December 2024), p 42.

153 Solar Energy UK ([NPE0013](#)).

of the positive impact that well-managed solar farms can have on biodiversity”.¹⁵⁴ Similarly, Isobel Morris highlighted research by scientists from the RSPB and the University of Cambridge which found that solar farms which are well-managed so as to benefit nature, through a mix of habitats, have nearly three times as many birds compared to adjacent arable farmland.¹⁵⁵ The authors concluded that “solar farms can benefit biodiversity in arable-dominated landscapes, especially when managed with biodiversity in mind”.¹⁵⁶

75. We heard that the need for a more strategic approach to aligning environmental protection with accelerating renewable energy development is especially pronounced in the marine environment. Alan Law, Deputy Chief Executive of Natural England, told the predecessor Committee in November 2023 that there is a need for strategic planning to accommodate the competing demands of marine conservation and offshore energy infrastructure.¹⁵⁷ He also highlighted that strategic planning could help to reduce the impact of grid infrastructure on marine and coastal protected sites.¹⁵⁸ The Crown Estate highlighted the development of the Marine Delivery Routemap to balance the interests of competing sectors and map the best use of the seabed and coastline.¹⁵⁹ The RSPB called for a Marine Spatial Plan that identifies sites that should be protected for seabirds and other wildlife.¹⁶⁰ We are aware that evidence to the Environmental Audit Committee’s recent inquiry, *Governing the Marine Environment*, criticised the current lack of strategic direction and the Government’s apparent lack of progress in the Marine Spatial Prioritisation Programme.¹⁶¹
76. A 2023 report, by the National Infrastructure Commission, found that the current scheme-by-scheme approach to environmental assessment can result in developers taking up to three years to gather species data which is often duplicated by other developers gathering the same data in the

154 Solar Energy UK (NPE0013). See: Solar Energy UK, “[Solar Habitat 2025: Ecological trends on solar farms in the UK](#)” and Solar Trade Association, “[The Natural Capital Value of Solar](#)” (2019).

155 Q32; University of Cambridge, “[Birdlife soars on nature-friendly solar farms](#)” (February 2025); RSPB, “[Solar farms managed for nature can boost bird numbers and biodiversity](#)” (February 2025).

156 Joshua P Copping, Catherine E Waite, Andrew Balmford, Richard B Bradbury, Rob H Field, Isobel Morris and Tom Finch, “[Solar farm management influences breeding bird responses in an arable-dominated landscape](#)”, Bird Study, 12 February 2025.

157 Oral evidence taken on 29 November 2023, Q220 [Alan Law].

158 Oral evidence taken on 29 November 2023, Q220 [Alan Law].

159 The Crown Estate (NPE0028).

160 Q15 [Isobel Morris]; RSPB (NPE0043).

161 Environmental Audit Committee, Second Report of Session 2024–25, [Governing the Marine Environment](#), HC 551, paras 35 to 42.

same area.¹⁶² Eleri Wilce, Head of Offshore Consents UK and Ireland at RWE Renewables, agreed with the need for more strategic approach and that project-by-project environmental impact assessments can lead to “significant delays and costs”.¹⁶³ She suggested that surveys carried out centrally, such as by the Crown Estate in advance of seabed leasing, should be agreed with regulators and statutory nature conservation bodies, and made available to developers.¹⁶⁴

77.

CONCLUSION

We welcome a more strategic approach to energy infrastructure planning that integrates the pursuit of climate and biodiversity goals and enables the early consideration of nature protection on a habitat-wide basis. We are encouraged to see this ambition reflected in the Government’s Clean Power 2030 Action Plan, the Strategic Spatial Energy Plan (SSEP) Methodology, the Land Use Framework (LUF) and the National Energy System Operator (NESO)’s high-level methodology principles for the Centralised Strategic Network Plan (CSNP). We recognise that these plans are still in development. However, the decision to subject the SSEP and the CSNP to detailed environmental assessments strengthens our conclusion that, if they realise this ambition, these strategic plans should be given weight in the determination of applications for development consent.

78.

CONCLUSION

Scientific evidence presented to us shows that, if well-planned and well-managed specifically to benefit nature, solar farms can increase biodiversity by creating mixed habitats for birds and other wildlife.

RECOMMENDATION

The Government should consider how guidance in the National Policy Statements could respond to such findings by positively encouraging such practices.

79.

RECOMMENDATION

The Government should require developers to avoid building on land that has high ecological and climate value, such as peat and saltmarsh.

162 National Infrastructure Commission, “Delivering net zero, climate resilience and growth” (April 2023), pp 21–22.

163 [Q139](#).

164 [Q139](#).

80.

CONCLUSION

Effective marine spatial planning will be essential to balance the protection of marine and coastal habitats with the accelerated development of offshore energy infrastructure.

RECOMMENDATION

We endorse the Environmental Audit Committee's recommendation that the Government clarify the objectives and timeline for outputs of the Marine Spatial Prioritisation Programme.

81.

CONCLUSION

There is a clear, recognised need for a more strategically coordinated approach to environmental impact assessments in the offshore wind sector.

RECOMMENDATION

The Government should consider how guidance in the National Policy Statements could help to achieve this and confirm what further steps it is taking to reduce unnecessary costs and delays incurred due to the current project-by-project approach.

The poor enforcement of ecological enhancements and landscape mitigations

82. During our oral evidence we learned that, despite the apparent consensus around a nature positive approach to energy infrastructure development, evidence shows that many environmental mitigations promised by developers are never delivered. Jackie Copley, Campaigns Lead at CPRE – The countryside charity, highlighted a recent study by the Royal Town Planning Institute (RTPI) which found that only 53% of ecological features required as conditions of planning consent were subsequently present on sites in real life.¹⁶⁵ Although the study was concerned with housing developments, rather than energy infrastructure, the RTPI concluded that these findings suggest “a systemic issue across the planning and development system as a whole”.¹⁶⁶

165 [Qq14 and 16](#); Royal Town Planning Institute, “[Are developers in England delivering ecological enhancements required by planning permissions?](#)” (May 2025), pp 5 and 7.

166 [Q14](#); Royal Town Planning Institute, “[Are developers in England delivering ecological enhancements required by planning permissions?](#)” (May 2025), p 7.

83. Our evidence suggests that several factors may lead to ecological enhancements not being enforced. Jackie Copley emphasised the importance of ensuring that local authorities and conservation bodies such as Natural England have enough resources: a problem noted by the RTPI, who explained that local authority enforcement teams have faced significant cuts over the past 14 years.¹⁶⁷ Graham Gunby explained that securing the necessary land rights is often a problem and that this can also be a barrier to the delivery of landscape, as well as environmental, mitigations. He gave the example of offsite plantings of trees and hedgerows which would mitigate the visual impacts of overhead lines. We heard that such landscape mitigations can often be arranged by developers making money available to local authorities so that they can pay landowners to host them, pursuant to statutory powers. However, where no nearby landowners are willing to do so, this can result in offsite ecological enhancements and landscape mitigations not being delivered at all:

*Even though the moneys might be provided, it needs a landowner to agree to do it, which they often do not. I have colleagues running around saying, “Where are the skylark plots going to go?” or “Where is the planting going to go?” We don’t know, nobody wants to do it, and it is a problem.*¹⁶⁸

We heard that restrictions on the use of compulsory purchase powers may be an underlying cause of the problem. Graham Gunby suggested that, in applying for development consent, developers should be encouraged or required to identify specifically where offsite landscape and environmental mitigations will be placed. Others suggested a review to understand the enforcement challenges underlying the issue.¹⁶⁹

84. **CONCLUSION**

We are gravely concerned by reports that many ecological enhancements and landscape mitigations promised by developers are never delivered in practice. This indicates systemic failings, brings the planning system into disrepute, and questions whether the Government will be able to fulfil its ambitions to build critical infrastructure in a nature positive way.

85. **CONCLUSION**

National planning policy should require developers to identify specific sites, both suitable and available, for offsite landscape and environmental mitigations in their development consent applications.

167 Royal Town Planning Institute, “[Are developers in England delivering ecological enhancements required by planning permissions?](#)” (May 2025), p 8.

168 [Q77](#) [Graham Gunby]

169 [Q77](#) [Ali Leeder].

86.

RECOMMENDATION

The Government should establish what proportion of ecological enhancements and landscape mitigations for energy infrastructure are delivered in practice, the most common reasons for lack of enforcement, and potential solutions. This analysis should consider offsite, as well as onsite, mitigations and how national planning policy could put more responsibility on developers for ensuring that such commitments are fulfilled. We would suggest:

- Requiring developers to identify specific sites for landscape and environmental mitigations and negotiate with landowners in advance of applying for development consent.
- Allowing the compulsory acquisition of sites identified for landscape and environmental mitigations if voluntary agreements are not possible.

5 Renewable energy infrastructure

87. The Government has proposed several changes to the National Policy Statement for Renewable Energy Infrastructure (EN-3), which reintroduce onshore wind into the Nationally Significant Infrastructure Projects (NSIP) regime and set out new guidance on inter-array wake effects between offshore wind developments. In this chapter we comment on the new guidance and highlight specific issues relating to solar farms which we think merit further consideration.

Onshore wind

88. The proposed changes to EN-3 reintroduce onshore wind into the NSIP regime with new guidance for development consent applications relating to onshore wind projects. This gives effect to previous recommendations of both the National Infrastructure Commission and the Business, Energy and Industrial Strategy Committee.¹⁷⁰ Pursuant to a new Statutory Instrument, the Government is setting the threshold for onshore wind and solar projects to be consented under the NSIP regime, rather than by local planning authorities, at 100 megawatts (MW).¹⁷¹ This is an onshore wind farm of around 13 or more turbines.¹⁷²
89. We received two main criticisms of the new guidance. The first relates to the threshold at which onshore wind projects fall under the NSIP regime, rather than the local planning system. The second concerns the proposed guidance for onshore wind developments on peatland.
90. First, although the reintroduction of onshore wind to the NSIP regime has been strongly welcomed,¹⁷³ we have heard that there is currently disagreement within the industry over whether the 100 MW threshold is too

170 National Infrastructure Commission, “Delivering net zero, climate resilience and growth” (April 2023), p 6; Business, Energy and Industrial Strategy Committee, [Revised \(Draft\) National Policy Statement for Energy](#) (2022) para 57; Business, Energy and Industrial Strategy Committee, [Decarbonisation of the power sector](#) (2023), para 78.

171 [The Infrastructure Planning \(Onshore Wind and Solar Generation\) Order 2025](#).

172 Department for Energy Security & Net Zero (DESNZ), [National Policy Statement for Renewable Energy Infrastructure \(EN-3\)](#) (April 2025), para 2.12.6.

173 RenewableUK ([NPE0036](#)); The National Infrastructure Planning Association ([NPE0039](#))

high.¹⁷⁴ Eleri Wilce told us that RWE Renewables is “unlikely to put forward onshore wind projects in England that reach that 100 MW threshold”.¹⁷⁵ She called for the threshold for onshore wind to be lowered to 50 MW, which she said would be “more realistic”.¹⁷⁶ Charles Wood agreed that although 100 MW is an “ambitious target”, it “may not be realistic until wind turbines are of a scale to deliver that on a smaller patch of land”.¹⁷⁷ He highlighted further considerations that could be raised by the prospect of a 100 MW onshore wind farm:

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.¹⁷⁸

Although we have heard different views on the issue, the suitability of the 100 MW threshold and the considerations which this might raise merit further analysis.

91.

RECOMMENDATION

The Government should, in its response to this Report, provide any evidence which it has that the proposed 100 MW threshold for onshore wind developments to fall under the Nationally Significant Infrastructure Projects regime will aid in the development of onshore wind projects, or whether the threshold should be lowered.

92.

The second issue on which the new guidance has been criticised concerns the proposed policy for building onshore wind farms on peatland. We were reminded that many of the upland areas in England where it is most windy contain peat.¹⁷⁹ The Climate Change Committee’s Balanced Pathway for the Seventh Carbon Budget recommended that 37% of upland peat should be restored to a natural or rewetted condition by 2030, 48% by 2035, 60% by 2040 and 79% by 2050.¹⁸⁰ The RSPB emphasised that onshore wind developments can damage peatland by permanently removing peat and reducing its ability to absorb water, increasing the risk that it will dry out

¹⁷⁴ RenewableUK ([NPE0036](#)).

¹⁷⁵ [Q170](#).

¹⁷⁶ [Q171](#).

¹⁷⁷ [Q172](#) [Charles Wood].

¹⁷⁸ [Q172](#) [Charles Wood].

¹⁷⁹ [Q17](#) [Isobel Morris].

¹⁸⁰ Climate Change Committee, “[The Seventh Carbon Budget: Advice for the UK Government](#)” (February 2025), p 191.

and release carbon into the atmosphere.¹⁸¹ Jackie Copley also pointed out that degrading peatland in the pursuit of net zero is “counterproductive” if it accelerates the release of carbon into the atmosphere.¹⁸² We were also informed that there is currently “no up-to-date mechanism for assessing carbon emissions from onshore wind construction in peat”.¹⁸³ Although there is a carbon calculator used in Scotland for this purpose, a recent study by the Scottish Government’s centre for climate expertise concluded that “accuracy is lacking” in all peat-related areas of the mechanism.¹⁸⁴

93. The Government’s proposed guidance for onshore wind provides that “onshore wind farm sites within England may be proposed on peatland”, despite the climate impacts of disturbance.¹⁸⁵ Although applicants are encouraged to “seek and rule out other locations” before doing so, this appears to set a relatively low threshold.¹⁸⁶ There is only one oblique reference to the avoidance of deep peat, as merely an “example” of “good practice” rather than a strong expectation or requirement.¹⁸⁷
94. The new policy refers to the NatureScot guidance, *Good practice during wind farm construction*,¹⁸⁸ which contains recommendations about development on peat. However, applicants are not directed to NatureScot’s more detailed guidance, *Advising on peatland, carbon-rich soils and priority peatland habitats in development management*.¹⁸⁹ We heard that applying this guidance in England “could both protect the deepest and rarest peatland habitats from harm, and help to fund peatland restoration”, for example by distinguishing between different types of peat and establishing a 1:10

181 RSPB (NPE0043). See also: Parliamentary Office of Science and Technology, [Releasing peatland emissions](#), POSTnote 668, April 2022; Climate Change Committee, [“The Seventh Carbon Budget: Advice for the UK Government”](#) (February 2025), p 195.

182 Q12.

183 RSPB (NPE0043).

184 ClimateXChange, [“Carbon Calculator for wind farms on Scottish peatlands: an evidence assessment”](#) (January 2025).

185 DESNZ, [National Policy Statement for Renewable Energy Infrastructure \(EN-3\)](#) (April 2025), para 2.12.74.

186 DESNZ, [National Policy Statement for Renewable Energy Infrastructure \(EN-3\)](#) (April 2025), para 2.12.74.

187 DESNZ, [National Policy Statement for Renewable Energy Infrastructure \(EN-3\)](#) (April 2025), para 2.12.76.

188 DESNZ, [National Policy Statement for Renewable Energy Infrastructure \(EN-3\)](#) (April 2025), para 2.12.76; NatureScot / NàdarAlba, [Good practice during wind farm construction](#) (Version: July 2024).

189 NatureScot / NàdarAlba, [Advising on peatland, carbon-rich soils and priority peatland habitats in development management](#) (Revised: November 2023).

loss-to-restoration ratio.¹⁹⁰ It was highlighted to us that the Department for Environment, Food and Rural Affairs is also taking steps to protect peatland.¹⁹¹

95.

CONCLUSION

Building renewable energy infrastructure on peatland is counterproductive to the achievement of net zero if this results in the release of accumulated carbon stores into the atmosphere. Given this context, and the Climate Change Committee's recommendations for peatland restoration in the Seventh Carbon Budget, it is surprising that the Government's proposed new guidance for onshore wind in EN-3 does not contain a presumption against building on deep peat, though we recognise that there are areas in which such development would be unavoidable. The weakness in the guidance also appears to undermine efforts of the Department for Environment, Food and Rural Affairs to protect peatland.

96.

RECOMMENDATION

The Government should amend the proposed new guidance on onshore wind in EN-3 to:

- whilst recognising there are areas in which development on peat would be unavoidable, introduce a presumption against building onshore wind developments on deep peat; and
- require the downstream carbon emissions from building onshore wind on peatland to be reported in any environmental statement for this kind of development.

97.

RECOMMENDATION

The Government should consider publishing an equivalent to Nature Scot's 2023 guidance, "Advising on peatland, carbon-rich soils and priority peatland habitats in development management".

Offshore wind

98. Wake effects occur where wind turbines create wind speed shadows behind them, resulting in a reduced wind resource for downstream turbines. The Government has proposed new guidance on inter-array wake effects in EN-

190 RSPB ([NPE0043](#)).

191 RSPB ([NPE0043](#)). See: Department for Environment, Food and Rural Affairs, "[England Peat Action Plan](#)" (May 2021).

3, to provide “greater clarity” on how offshore wind developers can consider and potentially mitigate them.¹⁹² The guidance provides that developers should co-ordinate with each other:

At the design stage there are therefore clear merits for applicants to make an assessment of inter-array wake effects between their proposed developments, and nearby offshore wind generating stations that are planned, consented or operational.¹⁹³

[...]

Applicants should demonstrate that they have taken all reasonable steps to minimise as far as possible the impact of wake effects on other offshore industries...this could include explaining how the configuration of a proposed offshore wind project has been evolved during the design process to reduce the impact, or how an applicant has managed the planned layout of an offshore wind turbine array....¹⁹⁴

Despite recommending an assessment of wake effects, the new guidance acknowledges that it may not be possible to entirely remove them and suggests that compensation may be necessary.¹⁹⁵

99. RWE Renewables told us that wake effects should not be a topic for the planning system because they are already dealt with within the Crown Estate seabed leasing rounds.¹⁹⁶ They warned us that the inclusion of guidance on wake effects within the National Policy Statements risks undermining offshore wind development.¹⁹⁷ Eleri Wilce said that the wording must be “absolutely crystal clear” that “projects should not be expected to damage their own business cases in pursuit of wake mitigation”.¹⁹⁸ The Government’s proposed wording is perceived as “highly ambiguous” and in need of “some very important tweaks to create certainty and avoid lengthy legal reviews which could hold up projects from getting planning consent”.¹⁹⁹ Charles Wood echoed these points and emphasised that any guidance should be updated as the offshore wind industry acquires more data and understanding of possible mitigation actions.²⁰⁰

192 DESNZ, [Planning for New Energy Infrastructure: Revised draft National Policy Statements for energy infrastructure](#) (April 2025), p 11.

193 DESNZ, [National Policy Statement for Renewable Energy Infrastructure \(EN-3\)](#) (April 2025), para 2.8.176.

194 DESNZ, [National Policy Statement for Renewable Energy Infrastructure \(EN-3\)](#) (April 2025), para 2.8.232.

195 DESNZ, [National Policy Statement for Renewable Energy Infrastructure \(EN-3\)](#) (April 2025), para 2.8.233.

196 [Q136](#) [Eleri Wilce]; RWE ([NPE0042](#)).

197 RWE ([NPE0042](#)).

198 [Q136](#).

199 RWE ([NPE0042](#)).

200 [Q137](#) [Charles Wood].

100.

CONCLUSION

The concerns that we have heard from industry about the Government’s proposed new guidance on inter-array wake effects in EN-3 suggest that this may not have provided the clarity that was intended. This may especially be the case in relation to whether projects might be expected to damage their own business cases when taking “all reasonable steps to minimise” wake effects “as far as possible”.

RECOMMENDATION

To provide greater certainty, the Government should amend the guidance to clarify precisely what is expected.

Solar farms

101. The Government’s proposed updates to the National Policy Statements do not specifically address national planning policy for solar energy. However, given the importance of solar photovoltaic generation in the Clean Power 2030 Action Plan, we have chosen to consider this as well. We confine our comments to specific issues relating to land type, agricultural land classification and food security.
102. Evidence to our predecessor Committee’s 2023 inquiry, *A flexible grid for the future*, underlined a lack of clarity within the National Policy Statements as to what precisely may justify the development of solar farms on Best and Most Versatile (BMV) agricultural land.²⁰¹ For example, this might include the availability of a grid connection or, under the Government’s new strategic framework, alignment with the Clean Power 2030 Action Plan or the Strategic Spatial Energy Plan (SSEP). For example, Estelle Dehon KC, a public law barrister specialising in environment and planning law, suggested that paragraph 2.10.21 of EN-3, which remains unchanged, is especially unclear (*emphasis added*):

*While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of “Best and Most Versatile” agricultural land where possible.*²⁰²

201 Written evidence for the Committee’s inquiry, *A flexible grid for the future*, Estelle Dehon KC ([GRI0120](#)), February 2024.

202 DESNZ, [National Policy Statement for Renewable Energy Infrastructure \(EN-3\)](#) (April 2025), para 2.10.21.

The qualification in the first sentence (“While land type...location”) appears contrary to the second sentence and the later requirement for the Secretary of State to “take into account the economic and other benefits” of BMV agricultural land in paragraph 2.10.137.²⁰³ We also heard that the caveats “where possible” “will inevitably lead to confusion and inconsistent decision-making”.²⁰⁴ Responding to this call for evidence, the National Infrastructure Planning Association also suggested that paragraphs 2.10.20 to 2.10.26 of EN3 “do not go far enough” in reducing unnecessary argument about BMV agricultural land.²⁰⁵ Agreeing that “terms like ‘where possible’ and ‘necessary’ are open to interpretation”, they told us that paragraph 2.10.21 is “the main problem”.²⁰⁶

- 103.** Food security is at the heart of the current guidance on land type and BMV agricultural land, even though EN-3 makes no reference to it at all. One year on, there is still a lack of clarity in national planning policy as to how exactly food security should be taken into account where solar farms are proposed on BMV agricultural land. Ali Leeder told us that the issue is taking up significant time and resources during project examinations:

I have been part of examinations for several large-scale solar farms. In all of them there has been an argument about the impact on food security, and a lot of discussion, written questions and evidence has been produced. In each case, the conclusion has been the same: that the impact of those particular schemes on BMV agricultural land was acceptable, and food security was not taken as a wider material planning consideration.²⁰⁷

203 Written evidence for the Committee’s inquiry, *A flexible grid for the future*, Estelle Dehon KC ([GRI0120](#)), February 2024; DESNZ, [National Policy Statement for Renewable Energy Infrastructure \(EN-3\)](#) (April 2025), para 2.10.137.

204 Written evidence for the Committee’s inquiry, *A flexible grid for the future*, Estelle Dehon KC ([GRI0120](#)), February 2024.

205 The National Infrastructure Planning Association ([NPE0039](#)).

206 The National Infrastructure Planning Association ([NPE0039](#)). The National Infrastructure Planning Association suggested that para 2.10.21 could be amended “to read something like: ‘Land type should not be a predominating factor in determining the suitability of the site location. Where previously developed land, brownfield land or industrial land is reasonably available for development, applicants are encouraged to utilise this land in preference to best and most versatile agricultural land. Where the use of any agricultural land is proposed, poorer quality land should be preferred to higher quality (“Best and Most Versatile”) land where poorer quality land is reasonably available for development. Whether land is reasonably available for development will depend on a range of commercial, economic and environmental factors which should be considered by the applicant as part of their site selection process.’”

207 [Q79](#).

Similarly, on behalf of Island Green Power, Chandni Ruparelia agreed that food security “comes up in every single consultation and every single examination phase”.²⁰⁸ However, because the agricultural land section of EN-3 makes “no mention of food security”, “the examining authority and planning inspectors have no basis or guidance to make decisions around this very topic”.²⁰⁹

104. Several witnesses agreed that the National Policy Statements should state unambiguously where the Government stands on food security and BMV agricultural land,²¹⁰ or at least provide “strategic direction as to what the response should be” when the issue arises.²¹¹ We were told by some that the evidence is now clear that, even under the most ambitious scenarios, solar farms will have a minimal impact on food security and the National Policy Statements should acknowledge this.²¹²
105. On the other hand, others regarded the current guidance as “fundamentally inadequate for safeguarding high-quality agricultural land”.²¹³ Richard Fuller, Member of Parliament for North Bedfordshire, criticised the lack of a presumption against the use of BMV agricultural land, the “vague and non-binding” requirement for the Secretary of State to “consider” the impact of this,²¹⁴ and the lack of alignment with a broader land use strategy.²¹⁵
106. BMV agricultural land is defined as land in grades 1, 2 and 3a of the Agricultural Land Classification (ALC),²¹⁶ a document which has not been amended since 1988.²¹⁷ The Country Land and Business Association told us that the ALC “must be updated as a matter of urgency” to reflect the impacts of climate change, changes to farming practices and technological developments which could have changed these classifications.²¹⁸ They further suggested that there should be “a mechanism for assessing each farm on its own merits” through site verification, in recognition that “no

208 [Q143](#).

209 [Q143](#).

210 [Q79](#) [Ali Leeder]; [Q80](#) [Peta Donkin]; [Q143](#) [Chandni Ruparelia]; The National Infrastructure Planning Association ([NPE0039](#)).

211 [Q78](#) [Graham Gunby].

212 [Q79](#) [Ali Leeder]; The National Infrastructure Planning Association ([NPE0039](#)).

213 Mr Richard Fuller (Member of Parliament at the House of Commons) ([NPE0025](#)).

214 DESNZ, [National Policy Statement for Renewable Energy Infrastructure \(EN-3\)](#) (April 2025), para 2.10.22.

215 Mr Richard Fuller (Member of Parliament at the House of Commons) ([NPE0025](#)).

216 DESNZ, [National Policy Statement for Renewable Energy Infrastructure \(EN-3\)](#) (April 2025), para 2.10.21. See: Natural England, “[Agricultural Land Classification of England and Wales: Revised criteria for grading the quality of agricultural land \(ALC011\)](#)” (October 1988).

217 Natural England, “[Agricultural Land Classification of England and Wales: Revised criteria for grading the quality of agricultural land \(ALC011\)](#)” (October 1988).

218 Country Land and Business Association (CLA) ([NPE0024](#)).

map layer can ever be completely accurate”.²¹⁹ Chandni Ruparelia also told us that the ALC is no longer accurate, pointing out that it also does not take into account current land use and the effect of soil degradation.²²⁰ She called for greater clarity as to when site surveys are necessary to test land classification, explaining that this is often done on a precautionary basis.²²¹ Finally, Solar Energy UK asked for clearer recognition in EN-3 that BMV agricultural land “is not clustered in a single area but occurs in a patchwork across field parcels, often mixed with lower-grade land”.²²² In such cases, “it would not be commercially or operationally viable to exclude entire parcels from consideration simply due to the presence of some higher-grade soils”.²²³

107. CONCLUSION

We are concerned that a lack of clear guidance is leading to unnecessary arguments about food security taking up disproportionate time and resources during examinations. We are concerned that the current guidance on agricultural land classification and land type for solar farms, in paragraphs 2.10.20 to 2.10.26 of EN-3, is ambiguous, equivocal and seemingly contradictory, particularly in relation to development on BMV agricultural land. There is a compelling need for the National Policy Statements to contain an unequivocal and evidence-based statement of policy in relation to this issue, including the circumstances where BMV agricultural land should or should not be available for development.

108. RECOMMENDATION

The Government should review and amend this guidance to:

- The Government should reaffirm its commitment to developing solar on developed land, brownfield land, contaminated land and industrial land before agricultural land. The Government should also consider innovative ways to develop solar energy without agricultural land.
- Clarify more precisely how applicants and decision-makers should assess land type and agricultural land classification, including the use of BMV agricultural land.
- Refer explicitly to food security and explain how decision-makers should take this consideration into account.

219 Country Land and Business Association (CLA) ([NPE0024](#)).

220 [Q143](#).

221 [Q143](#).

222 Solar Energy UK ([NPE0013](#)).

223 Solar Energy UK ([NPE0013](#)).

- Clarify when site surveys are necessary to verify agricultural land classification.
- Recognise that BMV agricultural land may not all be clustered in one single area but may instead be located in a patchwork of field parcels, mixed with lower-grade land.

109.

RECOMMENDATION

The Government should review and update the Agricultural Land Classification, as a matter of urgency, to reflect how factors such as climate change, soil degradation, changes to farming practices and technological advancements might affect productivity.

Conclusions and recommendations

Our engagement with the Department

1. We find it immensely frustrating that the Government chose to act in a way which appeared to acquiesce to our requests for additional time to consider its draft National Policy Statements on Energy but only after we had compressed our schedule and carried out two oral evidence sessions on the same day. Obviously, had we been afforded the courtesy of notification of the arrangements in advance, we could, and would, have waited until the end of the public consultation period before commencing using the information arising from that process to inform our oral evidence sessions and create the added value, by test and challenge, that the process was designed to encourage. In the event, the additional time, while it allowed a less rushed consideration of the evidence before us, did not provide significant opportunity to broaden, or deepen, the scrutiny we could bring to bear as it came too late for us to change the questions that we were able to put to our witnesses. (Conclusion, Paragraph 6)
2. The Government has failed to respect the value of Parliamentary scrutiny in this process. It refused to listen to our concerns with its initial timescales until it was too late for us to utilise additional time effectively. The issues considered in the Report would have been better, and more comprehensively, examined and put to the test had the Government been open about the arrangements and told us, from the very start, that the deadline for producing our findings was to be 21 July, rather than 24 June. (Conclusion, Paragraph 7)
3. These statements are very important in determining how energy infrastructure will be developed for the foreseeable future. The process was established, by the last Labour government, to provide Parliament with a voice and time to determine what to say. It is disappointing that the current Government has failed to create sufficient space in which an effective and helpful Parliamentary process could take place. (Conclusion, Paragraph 8)

4. Given that the Government, in its Planning and Infrastructure Bill, is seeking to disapply the current requirement for the Secretary of State to respond to any resolutions made by a committee in either House of Parliament, we recommend that the Government, in future, ensures that:
 - a. Select Committees are provided with at least ten sitting weeks in which to consider future National Policy Statements and proposed amendments to an existing NPS,
 - b. this period should never commence before the conclusion of the department's related public consultation process, and
 - c. Parliament has a period of at least ten sitting days, in which consideration of the recommendations of a Select Committee can take place, before the NPS or amended NPS is designated by the relevant Secretary of State. (Recommendation, Paragraph 9)

The new strategic framework for energy infrastructure planning

5. We welcome the new strategic framework for energy infrastructure planning which the Government proposes to endorse in the National Policy Statements. However, even with these changes, the National Policy Statements do not sufficiently reflect the highly important role that strategic plans are intended to have in guiding future energy infrastructure development to achieve the Government's 2030 and 2050 targets. The relationship between the plans and the Nationally Significant Infrastructure Projects regime is far from clear. (Conclusion, Paragraph 23)
6. The Government's new strategic framework for energy infrastructure planning represents a significant departure from the existing market-led approach to development by industry. The National Policy Statements should define what is set centrally and what is expected from industry plainly and transparently, to give certainty and avoid ambiguity. (Conclusion, Paragraph 24)
7. The Government should amend the National Policy Statements for energy infrastructure to clarify the precise relationship and hierarchy between these documents and the strategic plans which the proposed updates endorse. (Recommendation, Paragraph 25)
8. It seems to us that this would be inconsistent. The availability and prospects of securing a grid connection are issues that should cut both ways, weighing for, or against, the grant of development consent depending on the circumstances. (Conclusion, Paragraph 30)

9. We acknowledge the concern that strategic plans should not predetermine the outcome of any application for development consent. However, neither should the planning system be blind to the very existence of such plans and, most importantly, to their possible impact on the prospects of a project securing a grid connection. It would undermine the purpose of strategic plans if the Secretary of State were unable to take them into account in the planning balance.
- The National Policy Statements should clearly recognise, as a material consideration, the regional and zonal capacities for different technologies specified in the Clean Power 2030 Action Plan and the Strategic Spatial Energy Plan.
 - The National Policy Statements should clearly recognise, as a material consideration, the optimal areas for different technologies identified in the Strategic Spatial Energy Plan. (Recommendation, Paragraph 32)
10. There needs to be more coordination between the application processes for development consent and a grid connection, given that each is highly relevant to the other and both will be influenced by the Clean Power 2030 Action Plan, the Strategic Spatial Energy Plan, and the Land Use Framework. It is essential that developers are not left stuck in a situation in which they cannot progress planning consent without more certainty in relation to the prospects of securing a grid connection and vice versa.
- The Government and the National Energy System Operator (NESO) should review how the application processes for development consent and a grid connection will interact, to achieve greater coordination between them. (Recommendation, Paragraph 33)
11. The National Policy Statements should give significant weight to the availability of a grid connection, as a paramount consideration in determining where electricity generation projects can be located. However, by the same token, where a project has not yet secured a grid connection, the prospects of doing so should also be a material consideration weighing for or against the grant of development consent. NESO may need to provide the Secretary of State with information to ensure that this question is considered accurately, fairly and efficiently within the development consent process.
- The Government should strengthen the existing guidance in the National Policy Statements to clarify that the Secretary of State should give significant weight to the availability of a grid connection.
 - The National Policy Statements should clarify how the Secretary of State should assess the future prospects of a project obtaining a grid connection, with reference to NESO's recent reforms to this process.

- The Government and NESO should assess whether, and in what circumstances, NESO may need to provide the Secretary of State with information about the prospects of a project obtaining a grid connection and how far it is aligned with strategic plans. (Recommendation, Paragraph 34)
- 12.** We welcome the decision to endorse the Centralised Strategic Network Plan (CSNP) in the National Policy Statements. However, we are concerned that the proposed guidance in paragraphs 3.3.78 to 3.3.80 of EN-1 is not clear enough about what, precisely, it is from the CSNP that is being endorsed. This must be unambiguous, to avoid unnecessary argument about the issue during the development consent process. (Conclusion, Paragraph 40)
- 13.** The Government should review and, if necessary, amend the proposed guidance endorsing the CSNP in paragraphs 3.3.78 to 3.3.80 of EN-1, to make the language more consistent, unambiguous, and more in keeping with current understandings of the intended purpose of the CSNP. This may involve:
- reviewing the reference to the CSNP displaying “indicative routes” in paragraph 3.3.80;
 - removing the reference in paragraph 3.3.79 to a “strategic solution”, an undefined term distinct from “strategic parameters”; and/or
 - replacing “strategic parameters” with “strategic corridors” until the CSNP is complete and a more precise definition can be adopted. (Recommendation, Paragraph 41)
- 14.** The National Policy Statements should clarify that adjustments may be made to the “strategic parameters” for new electricity transmission infrastructure set out in the Centralised Strategic Network Plan where this is justified following detailed design development, community consultations or environmental surveys. (Recommendation, Paragraph 42)
- 15.** Endorsement of the Strategic Spatial Energy Plan, the Centralised Strategic Network Plan and the Electricity Transmission Design Principles in the National Policy Statements should not become official until these plans are finalised and have completed public consultation and environmental assessments. At that stage, the Government should review the proposed policy wording to do so and should implement any necessary changes through the streamlined procedure for amending the National Policy Statements being introduced in the Planning and Infrastructure Bill. (Recommendation, Paragraph 46)

16. We have not had the opportunity to consider the issue in detail. However, we believe that there is merit to these arguments, given that electricity distribution infrastructure is strategically important and can be much smaller in scale than transmission infrastructure. (Conclusion, Paragraph 48)
17. The Government should review whether some types of electricity distribution infrastructure should be removed from the Nationally Significant Infrastructure Projects regime and instead consented under section 37 of the Electricity Act 1989, to speed up delivery critical to Clean Power by 2030. These may include 132kV wood poles. (Recommendation, Paragraph 49)

The role of community engagement in building public support for strategic plans

18. The complex judgments involved in evaluating different options for electricity network infrastructure not only raise a strong argument for settling these strategic considerations at an earlier stage, but also heighten the need for affected communities to be involved in those decisions. (Conclusion, Paragraph 53)
19. It would be regrettable if this timeline meant that public engagement activities taking place towards the end of the consultation period have less, or even no, impact on the final outcome. (Conclusion, Paragraph 58)
20. The Strategic Spatial Energy Plan (SSEP), the Centralised Strategic Network Plan (CSNP) and the Land Use Framework (LUF) are valuable opportunities to build greater public understanding of the need for energy infrastructure and the trade-offs involved in choosing between different options and locations, at an early stage of the development process. (Conclusion, Paragraph 60)
21. We welcome the National Energy System Operator (NESO)'s ambition for meaningful and comprehensive engagement with diverse communities, economic interests and societal groups throughout the development of the SSEP and the CSNP. At the very least, we expect the use of surveys, focus groups, roundtables, stakeholder meetings, events and webinars to engage with people directly. It is imperative that public consultation over these plans includes targeted engagement with communities who will see large volumes of infrastructure, clusters of projects, or energy infrastructure in their locality for this first time, as set out in the SSEP methodology. Engagement with these communities should raise awareness of the infrastructure which they are likely to see in the years to come. (Conclusion, Paragraph 61)

- 22.** At this early stage, we have yet to see sufficient evidence of NESO’s ambitions for societal engagement and public consultation being put into practice in the development of the SSEP and the CSNP. In the autumn, we expect to hear further details of: (i) NESO’s consultation strategy; and (ii) how the societal forums and stakeholder working groups have been contributing to the development of these plans. (Conclusion, Paragraph 62)
- 23.** To protect the time allocated for public engagement and consultation on the draft SSEP, without compromising NESO’s deadline to publish the final SSEP in December 2026, there can be no delay to:

- NESO’s presentation of the SSEP pathway options to the Secretary of State;
- The Secretary of State’s selection of a pathway option; or
- NESO’s preparation for the consultation and community engagement activities.

The draft SSEP should be published for consultation by the end of February 2026 at the very latest and earlier if possible. The Secretary of State should decide upon the chosen SSEP pathway in sufficient time to enable this. (Recommendation, Paragraph 63)

Nature positive approaches to energy infrastructure

- 24.** We have concerns about the effect of the proposed new policy, in paragraph 4.2.24 of EN-1, that measures to mitigate the environmental impacts of Critical National Priority (CNP) infrastructure are “unlikely to be considered to be appropriate” if they “result in a material reduction in generation capacity”. The word “material” is ambiguous. We are not persuaded that the Government has sufficiently considered how this change of policy might affect the achievement of biodiversity targets in the UK or those adopted by the devolved administrations. (Conclusion, Paragraph 68)
- 25.** National planning policy for CNP infrastructure should strongly encourage innovative strategies to reduce environmental impacts and, where appropriate, adjustments to site boundaries, layouts or the volume of electricity generation in specific areas for this purpose. (Conclusion, Paragraph 69)
- 26.** The Government should review whether the following sentence in EN-1, paragraph 4.2.24, is consistent with its own domestic and international biodiversity commitments, as well as those of the devolved administrations:

“Measures that result in a material reduction in generation capacity for CNP infrastructure are unlikely to be considered to be appropriate as mitigation.” (Recommendation, Paragraph 70)

27. We welcome a more strategic approach to energy infrastructure planning that integrates the pursuit of climate and biodiversity goals and enables the early consideration of nature protection on a habitat-wide basis. We are encouraged to see this ambition reflected in the Government’s Clean Power 2030 Action Plan, the Strategic Spatial Energy Plan (SSEP) Methodology, the Land Use Framework (LUF) and the National Energy System Operator (NESO)’s high-level methodology principles for the Centralised Strategic Network Plan (CSNP). We recognise that these plans are still in development. However, the decision to subject the SSEP and the CSNP to detailed environmental assessments strengthens our conclusion that, if they realise this ambition, these strategic plans should be given weight in the determination of applications for development consent. (Conclusion, Paragraph 77)
28. Scientific evidence presented to us shows that, if well-planned and well-managed specifically to benefit nature, solar farms can increase biodiversity by creating mixed habitats for birds and other wildlife. (Conclusion, Paragraph 78)
29. The Government should consider how guidance in the National Policy Statements could respond to such findings by positively encouraging such practices. (Recommendation, Paragraph 78)
30. The Government should require developers to avoid building on land that has high ecological and climate value, such as peat and saltmarsh. (Recommendation, Paragraph 79)
31. Effective marine spatial planning will be essential to balance the protection of marine and coastal habitats with the accelerated development of offshore energy infrastructure. (Conclusion, Paragraph 80)
32. We endorse the Environmental Audit Committee’s recommendation that the Government clarify the objectives and timeline for outputs of the Marine Spatial Prioritisation Programme. (Recommendation, Paragraph 80)
33. There is a clear, recognised need for a more strategically coordinated approach to environmental impact assessments in the offshore wind sector. (Conclusion, Paragraph 81)
34. The Government should consider how guidance in the National Policy Statements could help to achieve this and confirm what further steps it is taking to reduce unnecessary costs and delays incurred due to the current project-by-project approach. (Recommendation, Paragraph 81)

- 35.** We are gravely concerned by reports that many ecological enhancements and landscape mitigations promised by developers are never delivered in practice. This indicates systemic failings, brings the planning system into disrepute, and questions whether the Government will be able to fulfil its ambitions to build critical infrastructure in a nature positive way. (Conclusion, Paragraph 84)
- 36.** National planning policy should require developers to identify specific sites, both suitable and available, for offsite landscape and environmental mitigations in their development consent applications. (Conclusion, Paragraph 85)
- 37.** The Government should establish what proportion of ecological enhancements and landscape mitigations for energy infrastructure are delivered in practice, the most common reasons for lack of enforcement, and potential solutions. This analysis should consider offsite, as well as onsite, mitigations and how national planning policy could put more responsibility on developers for ensuring that such commitments are fulfilled. We would suggest:
- Requiring developers to identify specific sites for landscape and environmental mitigations and negotiate with landowners in advance of applying for development consent.
 - Allowing the compulsory acquisition of sites identified for landscape and environmental mitigations if voluntary agreements are not possible. (Recommendation, Paragraph 86)

Renewable energy infrastructure

- 38.** The Government should, in its response to this Report, provide any evidence which it has that the proposed 100 MW threshold for onshore wind developments to fall under the Nationally Significant Infrastructure Projects regime will aid in the development of onshore wind projects, or whether the threshold should be lowered. (Recommendation, Paragraph 91)
- 39.** Building renewable energy infrastructure on peatland is counterproductive to the achievement of net zero if this results in the release of accumulated carbon stores into the atmosphere. Given this context, and the Climate Change Committee's recommendations for peatland restoration in the Seventh Carbon Budget, it is surprising that the Government's proposed new guidance for onshore wind in EN-3 does not contain a presumption against building on deep peat, though we recognise that there are areas in which such development would be unavoidable. The weakness in the guidance also appears to undermine efforts of the Department for Environment, Food and Rural Affairs to protect peatland. (Conclusion, Paragraph 95)

- 40.** The Government should amend the proposed new guidance on onshore wind in EN-3 to:
- whilst recognising there are areas in which development on peat would be unavoidable, introduce a presumption against building onshore wind developments on deep peat; and
 - require the downstream carbon emissions from building onshore wind on peatland to be reported in any environmental statement for this kind of development. (Recommendation, Paragraph 96)
- 41.** The Government should consider publishing an equivalent to Nature Scot’s 2023 guidance, “Advising on peatland, carbon-rich soils and priority peatland habitats in development management”. (Recommendation, Paragraph 97)
- 42.** The concerns that we have heard from industry about the Government’s proposed new guidance on inter-array wake effects in EN-3 suggest that this may not have provided the clarity that was intended. This may especially be the case in relation to whether projects might be expected to damage their own business cases when taking “all reasonable steps to minimise” wake effects “as far as possible”. (Conclusion, Paragraph 100)
- 43.** To provide greater certainty, the Government should amend the guidance to clarify precisely what is expected. (Recommendation, Paragraph 100)
- 44.** We are concerned that a lack of clear guidance is leading to unnecessary arguments about food security taking up disproportionate time and resources during examinations. We are concerned that the current guidance on agricultural land classification and land type for solar farms, in paragraphs 2.10.20 to 2.10.26 of EN-3, is ambiguous, equivocal and seemingly contradictory, particularly in relation to development on BMV agricultural land. There is a compelling need for the National Policy Statements to contain an unequivocal and evidence-based statement of policy in relation to this issue, including the circumstances where BMV agricultural land should or should not be available for development. (Conclusion, Paragraph 107)
- 45.** The Government should review and amend this guidance to:
- The Government should reaffirm its commitment to developing solar on developed land, brownfield land, contaminated land and industrial land before agricultural land. The Government should also consider innovative ways to develop solar energy without agricultural land.
 - Clarify more precisely how applicants and decision-makers should assess land type and agricultural land classification, including the use of BMV agricultural land.

- Refer explicitly to food security and explain how decision-makers should take this consideration into account.
- Clarify when site surveys are necessary to verify agricultural land classification.
- Recognise that BMV agricultural land may not all be clustered in one single area but may instead be located in a patchwork of field parcels, mixed with lower-grade land. (Recommendation, Paragraph 108)

46. The Government should review and update the Agricultural Land Classification, as a matter of urgency, to reflect how factors such as climate change, soil degradation, changes to farming practices and technological advancements might affect productivity. (Recommendation, Paragraph 109)

Formal Minutes

Tuesday 1 July 2025

Members present

Bill Esterson (Chair)

Ms Polly Billington

Torcuil Crichton

Sir Christopher Chope

Luke Murphy

Melanie Onn

Mike Reader

Bradley Thomas

Claire Young

Gridlock or growth? Avoiding energy planning chaos

Draft Report (Gridlock or growth? Avoiding energy planning chaos), proposed by the Chair, brought up and read.

Ordered, That the draft Report be read a second time, paragraph by paragraph.

Paragraphs 1 to 109 read and agreed to.

Resolved, That the Report be the Second Report of the Committee to the House.

Ordered, That the Chair make the Report to the House.

Ordered, That embargoed copies of the Report be made available, in accordance with the provisions of Standing Order 134.

Adjournment

Adjourned till Wednesday 2 July 2025 at 2.30pm.

Witnesses

The following witnesses gave evidence. Transcripts can be viewed on the [inquiry publications page](#) of the Committee's website.

Wednesday 21 May 2025

Sam Richards, Chief Executive Officer, Britain Remade; **Jackie Copley MRTPI**, Campaigns Lead, Campaign for Protection of Rural England; **Isobel Morris**, Senior Policy Officer - Energy, Royal Society for the Protection of Birds (RSPB) [Q1–41](#)

Peta Donkin, Board Member and Policy and Practice Lead, National Infrastructure Planning Association; **Ali Leeder**, Director, Aeos Infrastructure Planning; **Graham Gunby**, National Infrastructure Planning Manager, Suffolk County Council [Q42–84](#)

Wednesday 21 May 2025

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) [Q85–129](#)

Charles Wood, Deputy Director, Policy (Systems), Energy UK; **Chandni Ruparelia**, Chief Operating Officer, Island Green Power; **Eleri Wilce**, Head of Offshore Consents UK & Ireland, RWE Renewables [Q130–176](#)

Published written evidence

The following written evidence was received and can be viewed on the [inquiry publications page](#) of the Committee's website.

NPE numbers are generated by the evidence processing system and so may not be complete.

1	Brayshaw, Prof David (Professor of climate science and energy-meteorology, University of Reading); Chalvatzis, Prof Konstantinos (Professor of Sustainable Business, University of Exeter); Dent, Prof Chris (Professor of Industrial Mathematics, University of Edinburgh); Maycock, Prof Amanda (Professor of Climate Dynamics, University of Leeds); Sparrow, Assoc Prof Sarah (Associate Professor in Environmental Impact, University of Oxford); and Wallom, Prof David (Professor of Informatics, University of Oxford)	NPE0031
2	British Standards Institution	NPE0023
3	Association of Local Government Archaeological Officers (ALGAO)	NPE0026
4	British Energy Efficiency Federation	NPE0011
5	Campaign for the Protection of Rural Wales	NPE0016
6	Campaign to Protect Rural England (CPRE)	NPE0029
7	Campaign to Protect Rural England (CPRE) Warwickshire Branch	NPE0037
8	Comhampton Solar Action Group	NPE0010
9	Country Land and Business Association (CLA)	NPE0024
10	EPSRC Supergen Energy Networks Hub / University of Bath	NPE0006
11	Energy Networks Association	NPE0044
12	Foster FRICS, Nigel (NPJ Foster FRICS)	NPE0035
13	Foster, Mr John	NPE0021
14	Friends of Carrington Moss	NPE0009
15	Gren Energy UK Ltd.	NPE0003
16	Hollingsworth, Mrs Sallie	NPE0022
17	Institution of Engineering and Technology	NPE0004

18	Lang, PS	NPE0012
19	Lawrence, Ms Monica	NPE0014
20	Li, Professor Furong (Research Chair - National Grid Electricity Distribution/Royal Academy of Engineering, University of Bath); Turvey, Professor Nigel (Professor in Practice, University of Bath); Shea, Dr Andy (Sector Lecturer in Building Physics, University of Bath); Gu, Professor Chenghong (Professor in Energy Systems, University of Bath); and Souto, Dr Laiz (Lecturer in Power Systems Engineering, University of Bath)	NPE0018
21	Makinson, Catherine (Chairperson, Lincolnshire Against Needless Destruction (L.A.N.D)); and Phillips, Peter	NPE0001
22	Margiotta, Mr Nicholas	NPE0002
23	Matthews, Anne	NPE0007
24	Mr Richard Fuller MP	NPE0025
25	National Grid	NPE0041
26	Nuclear Industry Association	NPE0019
27	Royal Society for the Protection of Birds (RSPB)	NPE0043
28	RWE	NPE0042
29	RenewableUK	NPE0036
30	Roadchef	NPE0032
31	Roberts, Mr Andrew	NPE0015
32	Royal Society for the Protection of Birds (RSPB)	NPE0034
33	SP Energy Networks	NPE0038
34	Sir Bernard Jenkin MP	NPE0033
35	Solar Energy UK	NPE0013
36	Suffolk County Council	NPE0020
37	The Carbon Capture and Storage Association (CCSA)	NPE0040
38	The Crown Estate	NPE0028
39	The MCS Foundation	NPE0008
40	The National Infrastructure Planning Association	NPE0039
41	Together Against Sizewell C	NPE0030
42	United Kingdom Without Incineration Network (UKWIN)	NPE0005
43	Wade, Mr Brian	NPE0027
44	West London Alliance; and West London Business	NPE0017

List of Reports from the Committee during the current Parliament

All publications from the Committee are available on the [publications page](#) of the Committee's website.

Session 2024–25

Number	Title	Reference
1st	Retrofitting homes for net zero	HC 453