

Written evidence submitted by Energy UK (NPS0007)

Please find the Energy UK written evidence submission addressing the following areas:

- **How effectively the revised NPS reflects Government's policy proposals in the Energy White Paper**

As they currently stand, the NPSs fall short of aligning with the Energy White Paper and needs to be updated to reflect the governments ambitions set out in the Energy White Paper. As the primary policy for the energy Nationally Significant Infrastructure Projects (NSIPs), it is essential that the NPSs embed not only the pressing need for renewables and low carbon technologies, such as hydrogen and Carbon Capture and Storage (CCS) but an ambition and consistent policy message (translated across all devolved administrations and into local planning and other consents such as marine licenses) that removes existing barriers and enables the delivery of the energy NSIPs in light of the existing climate emergency.

Energy White Paper notes, "*onshore wind and solar... will need sustained growth in the capacity of these sectors in the next decade.*" The categorical removal of onshore wind from EN-3 and the lack of mention of this technology in EN-1 is short-sighted and damaging to future deployment of this much-needed renewable energy source across the UK. The current drafting does not adequately reflect the importance of these technologies in meeting the UK's interim and Net Zero targets and therefore the documents must be strengthened to provide more explicit support.

- **How effectively the revised NPS supports the Government's targets for net zero by 2050.**

Overall, Energy UK do not consider the current draft revised NPS documents to have enough focus on Net Zero and we would welcome further engagement with BEIS to ensure that this is altered and reflected appropriately.

It is of paramount importance that the revised NPS documents do not only reflect our Net Zero ambitions now, but are future proof and reflective of vast changes our energy system will need to go through in order to be ready for Net Zero by 2050. Simply stating our Net Zero and Climate targets does not go far enough.

The Government should ensure that there is greater weighting and priority given to the climate emergency and its impacts. We would also like to see a greater emphasis on the role of the energy NSIPs in reducing the impacts of climate change. These should be the key criteria driving decisions by the Secretary of State and working together with the presumption in principle of development consent.

We believe that the decision making by the Secretary of State on energy infrastructure projects should take into account the contribution that the energy NSIPs would make to achievement of the Net Zero goal. We suggest that, equally, EN-1 should state that all energy NSIPs contribute to minimising climate change and the benefits of doing so outweigh in principle any localised impacts. Therefore, we would like to see guidance included on the weight that this factor should have in the decision-making process.

We also believe that the NPSs should be amended to assist environmental regulators and other statutory bodies in prioritising the Energy NSIPs. This should be reflected in a requirement that such bodies have a duty to engage with the energy NSIPs at all stages of the consenting exercise.

We consider the EN-5 NPS document to fall short of providing clear planning policy required to support electricity networks infrastructure. In order for the UK to reach its climate targets, a huge increase in deployment of renewable energy infrastructure will be required, including cables, substations, connections to shore and importantly onshore transmission. The NPS must place more weight on the contribution that renewable generation will make to net zero, and ensure it can be

aligned with future detailed plans on coordination of offshore and onshore transmission and generation.

This will include aligning with the Offshore Transmission Network Review (OTNR) and the joint BEIS and ESO Holistic Network Design Coordination (HNDC) work to ensure consistency in planning policy. There should be an endorsement in planning policy and a presumption in favour of developing these projects. This should include greater recognition of the long-term benefits from anticipatory investment in network infrastructure to enable efficient and timely connection of generation required to hit Net Zero targets.

Furthermore, in light of Net Zero, the CCC's 6th Carbon Budget scenarios pointed to the necessity in the reduction of unabated aviation demand. Therefore, the NPSs need to be amended to ensure that the prioritisation of local aviation development above renewable energy development must be resisted.

- **How effectively the revised NPS takes account of other aspect of the Government's plans for energy generation**

Energy UK welcomes the amendments made to reflect the current position on phase out of coal and large-scale oil-fired electricity generation. However, the changes made throughout the NPS fall short of reflecting the government's plans for energy generation and the important role the energy sector will play in the transition to Net Zero.

We firmly believe the NPS should make a stronger case for the inclusion other technologies alongside renewables that will contribute to our Net Zero target including all types of hydrogen, CCS and biomass. In light of this we suggest that EN-2 be renamed 'Thermal Combustion Generation' and be broadened to include hydrogen, biomass and CCS.

Similarly, in EN-4 to ensure it is in line with the government's hydrogen and CCS ambitions, EN-4 needs to be amended to be made more directly and equally applicable to hydrogen and CO₂ network, transport and storage infrastructure. This would include referring to up-to-date government policies, guidance and strategies on hydrogen and CCS.

Overall, we are concerned that as currently drafted, the NPS does not align with other Government strategies and plans for energy generation. In particular we are referring to the recently published Hydrogen Strategy and needs to be updated with the outcome of the Decarbonisation Readiness Consultation.

- **How effectively the proposals in the revised Energy NPS supports the communities who will be impacted by the delivery of new energy infrastructure.**

To ensure that the revised NPS supports the communities who will be impacted by the delivery of new energy infrastructure, it is important that the NPS also gives guidance to energy generators and transmission operators on the appropriate approach to community mitigation. Community benefits could encourage greater public acceptance of new infrastructure but at present cannot be provided in the current regulatory regime without clear policy requirement. Alternatively, a clear statement that the benefits of energy infrastructure do not require local 'compensation' would also serve to bring clarity to local communities and their representatives.

This has not been included in, or published alongside, the current NPS documents and we encourage BEIS to look into this.

- **How effectively the revised NPS takes account of sustainability and environmental considerations.**

There are inconsistencies in the language used in relation to Biodiversity and Environmental Net Gain throughout the suite of the NPS documents. All NPS documents should be updated to reflect the Environment Act 2021.

We are pleased to see the inclusion of biodiversity net gain and would welcome further clarity on implementing the net gain requirements. We would like the provisions on biodiversity net gain to be updated as per Schedule 15 of the Environment Act 2021. This would have to be updated further as regulation on net gain develop. We would also welcome clarity on the application of net gain on NSIPS in the terrestrial, intertidal and marine areas and the guidance and matrix applicable for these. In light of the fact that the dedicated guidance for marine net gain is not yet developed, we think that it is too early to include these obligations for NSIPs.

We welcome the inclusion of the Brundtland definition of sustainable development within the NPSs but believe these sections could usefully extend beyond providing context to instead unpack the implications of sustainable development for energy infrastructure. Identifying both the urgent need for low carbon energy infrastructure and the acceptability of impacts from individual proposals as principles for planning and decision making would help to operationalise sustainable development.

- **The effectiveness of the Government's consultation on the proposals contained in the energy NPS.**

Energy UK submitted a response to the informal NPS consultation in March 2021 and provided comments to BEIS on the NPS documents EN-1 to EN-5 via marked up documents. We have concerns as to whether or not BEIS have taken on board these comments as the majority of our suggested changes do not seem to have been incorporated within the new consultation documents. We welcome this opportunity to engage with BEIS on the Energy NPS documents and hope that BEIS take into account our feedback on this occasion. We would also welcome further engagement with industry beyond this consultation, to ensure that our concerns are addressed before the revised NPSs are adopted.

We would like to see the NPS documents kept under ongoing review and update in response to future policy changes and technology developments. Given that the energy system is moving at pace as the UK moves towards net zero, the NPS documents will need a more regular review and update which can reflect the emerging energy landscape. Such a review however should not penalise applications that are in the advance stages of pre-submission or have already been submitted to the Planning Inspectorate (PINS), so careful transitional provisions are mostly required. We believe that this can ensure projects are designed and consented using the best policy guidance, enabling a rapid deployment of critical net zero energy systems.

November 2021