



Department for
Energy Security
& Net Zero

Consultation Response | Planning for New Energy Infrastructure

Draft National Policy Statements for energy
infrastructure

March 2023

deliver our de-carbonisation and other objectives including to deliver the scale of deployment needed for Carbon Budget 6 and Net Zero?

Summary of responses

Responses were received from a range of stakeholders and contained a mixture of generic and technology specific points. A few suggested that more focus was needed on improving community engagement across all technologies and one organisation suggested that priority should be given in the NPS to the development of small hydroelectric power systems

Responses to this question on offshore wind specifically, related to environment, mitigation, and compensation; planning, consent, and licencing; hydrogen and CCUS; and fishing. Regarding compensation, the key area of concern was the risk of project-level compensation being 'used up,' with many calling for a more strategic approach to compensation. Similarly, a few respondents suggesting that guidance be produced to ensure developers engage with local communities and resolve issues ahead of a DCO being granted. Several respondents also stressed the importance of technologies for the future energy mix which are not included in the draft NPS. Some stated that the NPS should not favour the deployment of offshore wind at the detriment other technologies important to achieving net zero.

Government response

The government recognises the importance of ensuring that the voices of local communities are heard to secure successful outcomes from NSIPs both from a local and national perspective. We encourage all developers to actively participate in meaningful engagement with communities at the early stages of the planning process to deliver better outcomes for communities and will deliver any necessary changes to the NSIP regime through the National Infrastructure Planning Reform Programme.

The government acknowledges the valuable contribution of hydropower to the UK energy mix over many decades. However, planning applications for any new hydro projects coming forward are likely to be less than 50MW capacity and as such would be considered outside of the NSIP regime.

Our responses to the specific points raised in relation to offshore wind are as follows. The compensation text has been strengthened and agreed with Defra. In addition, there is ongoing government work to develop policies around strategic compensation which will be reflected in separate guidance alongside the NPS once completed. The current guidance (compensation guidance developed by Defra) is referred to in the text.

Q14. Do you have any other comments on the amendments to EN-3?

Summary of responses

We received responses from a range of stakeholders, again covering a mixture of generic as well as technology specific issues.

Some respondents suggested that a national land use strategy should be considered to ensure developments are directed to the most appropriate places and suggested that further weight should be given to local considerations. A few respondents were concerned that insufficient

emphasis is given in EN-1 and EN-3 to significant impacts on visual amenity and health and well-being arising from large infrastructure.

On biomass and energy from waste the following points were made:

A number of respondents took the opportunity to raise concerns addressed in Question 8 around sustainability and recategorising EfW in the NPS. The importance of combining carbon capture with EfW and biomass technologies was highlighted as a priority by some respondents, referencing the contribution this could make to net zero targets, and the need for BECCS to deliver genuine GHG emission savings over appropriate timescales was noted. Several respondents also noted the need to update the NPS to reflect the forthcoming expansion to Carbon Capture Readiness (also known as Decarbonisation Readiness), which will bring certain biomass and waste combustion plants within scope of the policy. In addition, there were concerns about the discharge of cooling water from biomass combustion plants as a risk to water quality.

A number of responses questioned the position of Energy from Waste (EfW) within EN-3 alongside other renewable forms of energy. There were conflicting views expressed about whether EfW is better than landfill in carbon terms. Some respondents highlighted that EfW is not low carbon. Some responses urged that priority should be further up the hierarchy – on recycling and reducing residual waste arising. Several responses questioned the inclusion of waste capacity in EN-3 as a consideration that should influence site selection. Additionally, responses pointed out a perceived contradiction between this consideration and the principle set out in EN-1, which states that it is not the government's intention to propose limits on any new electricity infrastructure that can be consented in accordance with the energy NPSs. Some respondents also expressed a view that additional EfW capacity was urgently required, whilst others expressed a conflicting view that there is over-capacity for EfW and called for a moratorium.

Offshore wind

There were a few responses relating to offshore wind, which covered the need for a co-ordinated approach between interested parties; repowering and decommissioning; and visual impacts. Several of the responses reiterated the need for good collaboration. This included developers working together in the event of cumulative impacts, especially in relation of biodiversity. A few of the respondents also questioned how repowering and decommissioning would be managed, with calls for a consistent 'baseline' situation that the applicant could compare their project to, to determine their future course of action.

Government Response

The government considers that there are already satisfactory arrangements in place for considering local considerations in decisions on NSIP infrastructure. Under the NSIP process, relevant local authorities will be consulted on both the proposal and how the local community should be consulted at the pre application stage.

EN-1 and the relevant technology sections of EN-3 set out the potential impacts of energy infrastructure on visual amenities and health and wellbeing and provide clear guidance on how these should be taken into account by the Secretary of State when assessing applications.