UK Government

Consultation Response | Planning for New Energy Infrastructure

2025 revisions to National Policy Statements for energy infrastructure

Department for Energy Security and Net Zero (2025)

Executive Summary

The National Policy Statements (NPSs) set out the government's policy for the delivery of energy infrastructure and provide the legal framework for planning decisions.

In July 2024 the government launched a review of the energy NPSs (EN-1 to EN-5) to ensure they reflected the government's energy priorities. These priorities were set out in the Clean Power 2030 Action Plan[1] and further in the government response to the consultation on the National Planning Policy Framework (NPPF), which included the commitment to reintroduce onshore wind into the Nationally Significant Infrastructure Projects (NSIP) regime[2].

Following a review of the energy NPSs the government drafted updates to EN-1 (the overarching energy NPS), EN-3 (renewable energy infrastructure) and EN-5 (electricity networks). No updates were made to EN-2 or EN-4 as a result of the review.

As material updates were made to EN-1, EN-3 and EN-5, government held a public consultation which ran between 24th April and 29th May 2025. There were 189 respondents, including from commercial and public organisations, members of the public and trade associations.

After carefully considering responses to the consultation, and the report of the Energy Security and Net Zero Committee published in July 2025[3], the government intends to proceed with the proposed updates to the NPSs, with some amendments.

The NPSs will be laid in Parliament for a 21-sitting day 'consideration period', before being published on GOV.UK.

Once published, the updated 2025 NPSs (EN-1, EN-3 and EN-5) will have effect in relation to applications for development consent accepted for examination. For applications that have been accepted for examination before publication of the updated 2025 NPSs, the 2024 versions will underpin planning decisions.

[1] https://www.gov.uk/government/publications/clean-power-2030-action-plan
[2] https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/outcome/government-response-to-the-proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system-consultation
[3] https://committees.parliament.uk/committee/664/energy-security-and-net-zero-committee/news/208202/gridlock-or-growth-esnz-committee-sets-out-measures-to-end-energy-planning-chaos-and-unlock-cleaner-cheaper-power-across-the-uk/

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Introduction

What are energy National Policy Statements?

The energy NPSs set out national energy policy and provide the foundations for decision making for NSIPs subject to an application for Development Consent under s104 of the Planning Act 2008.

EN-1 sets out the overarching need case and general assessment principles, whilst EN-2 to EN-6 set out technology specific assessment principles. In February 2025, the government also published a draft of EN-7, a new NPS for nuclear energy generation, for consultation.

Background on the Consultation

Following a review of the energy NPSs (EN-1 to EN-5) government drafted updates to:

- EN-1 (the overarching energy NPS). The policy narrative was updated to reflect the government's Clean Power 2030 mission. This included textual amendments to Critical National Priority policy to reflect the Clean Power 2030 Action Plan, which was published December 2024.
- EN-3 (renewable energy infrastructure). Updates provided guidance to developers and decision makers following the reintroduction of onshore wind into the NSIP regime. Updates also included clarificatory text on the consideration of wake effects by developers.
- EN-5 (electricity networks). This was updated to endorse the Centralised Strategic Network Plan and to reference the Electricity Transmission Design Principles.

The consultation asked questions about these updates. The intended purpose of the consultation was to understand how the material changes made to EN-1, EN-3 and EN-5 would impact wide-ranging stakeholders.

The consultation was open for 5 weeks between 24th April and 29th May 2025.

Categories of respondent

We received a total of 189 responses to the consultation via both the Citizen Space platform and email. We thank all the participants for their helpful responses, which have provided valuable views and evidence to shape policy development. A wide range of stakeholders engaged with the consultation, as can be seen in the below table:

Stakeholder group	Number
Member of the public	64
Commercial organisation	51
Government agency or public body	39
Business/trade association	24
NGO	8
Not shared	3
Total	**189**

After carefully reviewing the evidence received, government intends to proceed with the changes to the NPSs with some revisions. These changes will ensure the NPSs accord with current government policy and reinforce the government's ambition to deliver Clean Power by 2030 and Net Zero by 2050. Amendments made in light of consultation responses are largely of a technical nature or points of clarification and are detailed in the relevant sections of the government response below.

Terminology

The following terms are used in this document to summarise the views of respondents:

- "Most respondents" indicates the clear view of more than 75% of respondents;
- "Many respondents" indicates the view of 50%-75% of respondents;
- "Some respondents" refers to the range between 25% and 50% of respondents; and
- "A few respondents" refers to the range between 0% and 25% of respondents.

Summary of the responses to consultation and the government response

Clean Power 2030

Question 1. To what extent do you think the inclusion of Clean Power 2030 policy in EN-1 provides sufficient guidance for developers to bring forward relevant projects?

Summary of responses:

Several of the changes made to the NPSs to incorporate Clean Power 2030 policy were focused on updating wording on Critical National Priority (CNP) policy in EN-1. CNP policy was introduced as part of the 2024 NPS updates and the fundamental concept of CNP was consulted on at the time. Only the updates to CNP policy wording were consulted on as part of this review, however respondents broadly supported the definition of CNP infrastructure but raised concerns and the need for clarity about how CNP status would be applied in practice. Several themes emerged including the capacity of the planning system, and the balance between infrastructure delivery and impacts on the environment and communities.

Comments from respondents:

Whilst the clarification of Clean Power 2030 as a milestone was welcomed, some respondents called for more consistent language throughout EN-1 to maintain ambition. Some respondents expressed concern that the Clean Power 2030 capacity ranges (targets set out in the Clean Power Action Plan for clean energy technologies to be achieved by 2030), could be interpreted as a maximum limit that cannot be exceeded. It was felt this could potentially deter investment and undermine long-term deployment of clean energy.

Some updates were made to wording on CNP policy in order to incorporate Clean Power 2030 policy. CNP policy was introduced as part of the 2024 NPS updates and the principle of CNP status was consulted on at the time. Only the updates to CNP wording were consulted on as part of this review, however, some respondents sought clarity on how CNP status would be weighed against other material considerations, how CNP status would be applied consistently across different technologies and areas and what the role of statutory consultees would be.

Some respondents emphasised the importance of meaningful and early engagement with host communities on planning applications and raised concerns that the presumption in favour of consent for CNP infrastructure could marginalise local voices and reduce the consideration of environmental impacts. There were calls for clearer expectations on applications around community engagement and mitigations to protect the environment.

A few respondents expressed that local planning authorities (LPAs) are under-resourced and may struggle to deliver timely and high-quality submissions. LPAs contribute to the examination and implementation phases of NSIPs by providing local insight and assessing environmental and community impacts. Others noted the need for alignment between the

NPSs, the Strategic Spatial Energy Plan (SSEP) and reforms being delivered under the Planning and Infrastructure Bill (PIB), currently being considered by the UK Parliament, to avoid confusion and duplication for applicants.

Further suggestions:

A few respondents called for greater support for emerging technologies which they felt were not adequately integrated into the NSIP regime. Others emphasised that the NPSs alone are insufficient to deliver the government's energy ambitions and called for complementary reforms in grid policy, market design, and investment frameworks.

A few respondents raised concerns about projects that either no longer qualify as CNP or fall below the NSIP threshold. They suggested that without explicit policy direction, such projects could fall into a regulatory gap, neither benefiting from the streamlined NSIP process nor receiving adequate support through local planning routes.

Government response:

The government notes the concerns raised regarding the interpretation of Clean Power 2030 capacity ranges. Clean Power 2030 is a milestone that reflects the scale of ambition required to meet our Net Zero 2050 target; it is not a fixed ceiling on technology deployment or project approvals. The SSEP will build from the 2030 capacity range to offer a longer-term spatial plan for the energy system beyond 2030. In response, the government has removed reference in EN-1 to the Clean Power 2030 target capacities. We will continue to ensure that language used across government publications does not inadvertently constrain ambitious deployment of clean energy technologies.

The government recognises the importance of clarity around what CNP status entails. CNP status, when applied to low carbon energy infrastructure, is intended to signal the strategic importance of certain infrastructure types in delivering clean, secure energy. The NPSs set out how this designation should be considered in decision-making, alongside other material considerations, including environmental and community impacts, as detailed in sections 4.1, 4.3 and 5 of EN-1.

The government acknowledges concerns about the planning system's capacity and the role of LPAs. While resourcing is outside the scope of the NPSs, the government is working to support planning reform in policies and legislation including but not limited to those contained in the PIB and the SSEP. These reforms aim to improve planning capacity within LPAs by funding accredited training to upskill planning teams, introducing a national scheme of delegation to streamline decision-making, and strengthening the role of LPAs in strategic planning through the development of Strategic Development Strategies.

The government notes the views expressed on emerging technologies and projects which fall below the NSIP threshold. The government is confident that the current drafting of EN-1 adequately addresses the needs of emerging technologies. Government's commitment to updating the NPSs every 5 years will enable the NPSs to adapt further for emerging technologies.

Question 2. To what extent do you think the updates to the Critical National Priority policy help bring forward higher-quality applications?

Summary of responses:

Many respondents generally welcomed the updates to the NPSs but raised concerns about implementation, particularly around planning system capacity, clarity of CNP designation, and the treatment of emerging technologies.

Comments from respondents:

Some respondents raised concerns that the planning system, especially at LPA level, lacks resourcing to handle the volume and complexity of applications expected under the revised NPSs. They felt systemic investment in planning capacity was necessary to ensure effective implementation.

Some respondents commented that the presumption in favour of consent for CNP infrastructure could lead to approval of inappropriate or poorly designed projects. They called for clearer criteria to ensure that only well-designed and appropriately-sited projects benefit from this presumption and requested more guidance on what constitutes a “high quality” application.

A few respondents highlighted the need for clearer integration of emerging technologies. They called for more explicit recognition of these technologies and clarity around their eligibility under the NSIP regime.

A few respondents reiterated concerns that Clean Power 2030 capacity ranges could be interpreted as a fixed upper limit on the amount of clean energy capacity that can be deployed, rather than a milestone. A few respondents warned that this could inadvertently constrain ambition by leading to inconsistent interpretation by decision-makers and constrain long-term deployment by discouraging investment in projects that exceed the indicative range.

Further suggestions:

Some respondents reiterated the importance of ensuring that community and environmental concerns are not sidelined. They requested more explicit requirements around early engagement, mitigation, and the role of LPAs in the application process. A few respondents also called for more detailed guidance on assessing the visual and landscape impacts of CNP infrastructure.

A few respondents stressed that successful delivery of NPSs depends on broader alignment with wider energy policy. They urged the government to consider complementary reforms in market design and electricity networks. Respondents emphasised the importance of aligning the NPSs with other planning and infrastructure frameworks such as the NPPF and the SSEP.

Government response:

The government notes concerns about planning system capacity. As noted in the government response to Question 1, whilst the NPSs do not set resourcing policy, government is committed to supporting LPAs through wider planning reform, including but not limited to the

PIB and the SSEP. The government is also investing in upskilling planning teams through funding accredited training and improving capacity by introducing a national scheme of delegation to streamline decision-making. Together, these measures are intended to maintain momentum and improve the speed and quality of decision-making during application and consenting.

The government acknowledges calls for clearer treatment of emerging technologies. We will continue to develop policy and guidance to support their integration into the energy system.

We note concerns about the presumption in favour of consent for CNP infrastructure. The NPSs set out how this presumption should be balanced with other considerations, including the impact on local environments and communities. EN-1 and EN-3 include guidance on cumulative impacts, landscape and visual effects, and the role of statutory consultees. All applications are subject to robust scrutiny, with the need for infrastructure balanced against other material considerations. All decisions are made in accordance with the Planning Act 2008 and relevant policy frameworks.

Onshore Wind

Question 3. Do you have comments or amendments on any aspects of the new guidance for onshore wind?

Summary of responses:

The new onshore wind guidance in EN-3 covers several different areas – respondents addressed a wide range of topics covering most sections of the guidance. Around 40% of respondents did not provide any views or substantive comments to this question.

Given the diversity of responses, the government will not seek to summarise the views of respondents by individual section or topic. Where respondents provided substantive comments on the substance of the onshore wind section, this commonly focussed on the landscape and visual section such as views on how to streamline the text, correct omissions or errors, and feedback on the wording around localised impacts; how projects can co-exist with public rights of way to minimise impacts while maximising opportunities for enhancements; how peatland can be further protected or enhanced; technical clarifications regarding noise; and the benefits of repowered projects, including how effects should be considered and from what baseline.

Comments from respondents:

The consultation responses around landscape and visual impacts in the draft EN-3 consistently reflects concerns around the clarity, practicality, and proportionality of the language. A few respondents broadly supported the recognition that onshore wind developments will have visual impacts, particularly due to turbine height, but cautioned against overly prescriptive expectations, especially the requirement to mitigate impacts to a “localised level,” which some considered unclear or unachievable. A few respondents recommended edits to simplify and clarify language and correct errors in cross-references to other sections of the draft NPSs.

A few respondents broadly supported the idea that onshore wind developments can co-exist with public rights of way, provided impacts are carefully managed. A few highlighted the recreational benefits of wind farms, such as multi-use trails at Whitelee, and cautioned against use of mitigation measures like screening that could be hard to achieve for such large structures. A few respondents flagged that in some cases, having a public right-of-way on a site with a peatland restoration plan may not be suitable. Suggestions therefore included assessing public rights of way impacts on a case-by-case basis due to the uniqueness of each site and promoting co-benefits like new access routes where appropriate.

A few respondents called for stronger protections and clearer guidance around peatland in EN-3. Several suggested referencing NatureScot’s 2023 guidance, which includes a 1:10 restoration ratio, and called for Natural England to develop equivalent guidance for England. A few respondents raised concerns around the requirement for applicants to rule out other locations before siting on peatland, noting that not all peatland is in good condition and that developments can provide an opportunity for privately-funded restoration/enhancement of degraded peatlands.

A few respondents welcomed the inclusion of ETSU-R-97 as the basis for noise assessment but raised concerns about ambiguous terminology and outdated references. A few

recommended replacing the term “additional assessment” with “specific assessment” to avoid confusion, and correcting cross-references to EN-1 Section 5.12. A few respondents called for explicit endorsement of the 2013 IOA good practice guide and flexibility to incorporate future updates. Other suggestions included refining language around health impacts, proposing clearer references to infrasound, vibration, and low-frequency noise.

A few respondents emphasised the benefits of repowering existing onshore wind sites, including increased efficiency, extended operational life, and continued contribution to Net Zero targets. They recommended that impacts from repowered projects be assessed against the baseline of existing infrastructure, rather than treated as entirely new developments. A few respondents suggested that EN-3 should explicitly recognise the importance of repowering in maintaining progress towards Clean Power 2030.

Further suggestions:

A few respondents raised additional views. These included arguments that a broader energy strategy is required to deliver the government’s Clean Power 2030 objectives, including the need for a spatial strategy; and concerns that the impacts of onshore wind were too great as a technology. There were also questions as to whether onshore wind is an effective or reliable technology.

Government response:

Onshore wind is a mature and efficient renewable technology that is an essential part of the government’s Clean Power 2030 and Net Zero 2050 targets. Delivering these targets will help boost Britain’s energy independence, protect bill payers, support high-skilled jobs and tackle the climate crisis. As set out in the Clean Power Action Plan, we are committed to radically increasing onshore wind energy to 27-29GW by 2030, from around 15GW today (GB).

Given the pressing need for the acceleration of onshore wind, we have made legislation to reintroduce onshore wind projects over 100MW back into the NSIP regime, which will come into force at the end of 2025.

The government has considered all views on the new onshore wind section in EN-3 and has made changes throughout the document. These changes are largely clarifications, further explanations and technical updates to wording.

In response to consultation feedback, there are additional changes in relation to peat. Specific references to irreplaceable habitats such as blanket bog and lowland fen have been added, mirroring text included within EN-1; there is additional wording setting out further context on the importance of peatlands; language has been strengthened around conducting peat surveys and undertaking avoidance, management, mitigation or compensatory measures.

In relation to landscape and visual impacts – this section has been streamlined to remove inconsistencies with EN-1 on defining landscape and visual impacts; language around designated landscapes has been more thoroughly aligned with EN-1; text has been removed around landscape and visual impact assessments that may not match current guidance and therefore create inconsistencies. We have also clarified which guidance is available to support

conducting landscape and visual impact assessments and provided further explanation and clarification of what is meant by localised impacts.

The government is also currently exploring additional measures to support repowering and life extension.

Offshore Wind

Question 4. Do you have comments on any aspects of the updated guidance for offshore wind?

Summary of responses:

This 2025 NPS update to the Offshore Wind section of EN-3 focussed on the emerging consideration of wake effects in planning and consent of offshore windfarms. A few respondents also raised wider concerns around offshore wind planning policy. Of the 90 responses to this question, 15 related to wake effects.

There was a wide range of views shared by respondents to this question, including providing views on sections not updated ahead of this consultation. The government will not summarise all views shared across respondents. However, where relevant feedback was shared, it focused on these topics: physical mitigation of wake effects; collaboration between offshore windfarm developers regarding wake effects; whether compensation is required to mitigate wake effects. Whilst the topics respondents focused on shared commonality, views shared showed a clear lack of consensus amongst offshore wind developers on wake effects.

Comments from respondents:

All respondents who submitted detailed responses on wake effects were offshore wind farm developers, owners, shareholders, or investors. Two distinct perspectives emerged from these responses on how wake effects should be treated in the planning system.

Some respondents on wake effects claimed that the proposed planning guidance does not sufficiently protect existing offshore wind assets from the loss of energy caused by wake effects. They called for EN-3 to include stronger wording to reinforce protections for existing assets and to explicitly incorporate compensation as a form of mitigation.

Some respondents on wake effects advocated for the NPS to explicitly exclude compensation as a mitigation measure, expressing the view that there is no right to compensation for wake effects as there is no legal right to wind.

Further suggestions:

A few respondents also commented on wider offshore wind policy that extends beyond the scope of this section of the NPS review. These include the offshore wind consenting process, environmental compensatory measures policy and referencing specific OWEIP measures in the Offshore Wind section of EN-3.

Government response:

The government response is centred on substantive feedback given to the new “wake effects” paragraphs, acknowledging where respondents have provided views on other aspects of the Offshore Wind section of the NPS. “Wake effects” are where wind turbines disrupt the airflow to other turbines when they are downwind and may affect their energy production.

Government acknowledges that wake effects are a complex and evolving consideration within the offshore wind sector, with no clear industry consensus at this time. In response to consultation feedback, the government has made changes to improve clarity and ensure greater consistency across the NPS.

Following consultation, government has set the expectation that developers are to demonstrate reasonable efforts to mitigate wake effects, rather than being expected to fully eliminate. Whilst we heard some comments querying what usual collaboration between developments would be, the government expects developers to take a good neighbour approach and carry out a wake assessment on nearby developments as part of the consenting process. References to physical mitigation measure have been removed, following feedback in the consultation that these approaches are not practical without reducing the output of a proposed offshore windfarm development.

Some comments suggested defining specific distance between offshore wind developments to better set out the scope of offshore wind developments that need to collaborate on the matter of wake effects. The government considers that a fixed distance would not be appropriate as understanding of wake effects is still developing, and that infrastructure of this nature is given consideration on a case-by-case basis as to its impacts on other planned, consented or operational windfarms.

In other areas, respondents proposed significant changes to the new text, including suggestions to introduce financial compensation mechanisms to mitigate wake effects. On this, there were two opposing viewpoints within industry. Some respondents argued for better protection in the planning system from incoming projects, including an expectation that they should be compensated for output loss caused by wakes. Other respondents argued that wake effects have been accounted for at the seabed leasing stage, through TCE's buffer zone between each lease area, and therefore no compensation should be paid. On this issue, the government maintains that wake effects are a commercial matter to be resolved between developers and the planning system is not expected to adjudicate on compensation arrangements for wake effects. As the original draft aligns with this position, it has been retained.

Significant changes to the offshore wind section of EN-3 were made in 2024 and included technical clarifications around existing policies and how the Offshore Wind Environmental Improvement Package (OWEIP) will help accelerate offshore wind farm deployment.

Government has received comments on wider offshore wind policies and has made amendments throughout these sections to improve clarity and reflect the consultation responses. These include, for example, clarifying the "*as built*" parameters, aligning with wider government duties and terminology (such as the language on fisheries and aquaculture as used in the Joint Fisheries Statement), and strengthening the wording on environmental protections (including additions on coastal erosion and habitat restoration). We have also incorporated updates to reflect offshore transmission infrastructure and legal compliance. It is not possible to reference specific OWEIP measures in the 2025 NPS update as the OWEIP is still in development and the various elements are still to be published. However, we intend to

update references to the OWEIP in a future NPS review. We have noted the responses calling for a more strategic approach to compensation. The government is seeking to enable wider environmental compensatory measures through a Statutory Instrument and associated guidance later this year.

Electricity Networks Infrastructure

Endorsement of the Centralised Strategic Network Plan

Question 5. Do you agree with the proposal in EN-5 to endorse the electricity transmission recommendations set out in the CSNP to accelerate consenting times and support the upgrade of the electricity grid?

Summary of responses:

The Centralised Strategic Network Plan (CSNP), expected to be delivered in 2027, is a long-term network plan that will make strategic transmission recommendations extending to 2050. It will be a whole systems approach to network planning, bringing together electricity, gas and hydrogen transmissions.

There was a relatively even split between responses that supported the proposal and responses that did not support the proposal, with a smaller number of neutral responses.

Some respondents supported the proposal to endorse the CSNP recommendations, highlighting the need to prevent delays to projects required to deliver Clean Power 2030 and Net Zero 2050 targets through accelerated consenting, and the strengthening of transmission grid infrastructure. However, some respondents also raised concerns about the NPS endorsement of the CSNP, particularly relating to local engagement and environmental protections.

Comments from respondents:

Positive responses often characterised this proposal as essential, recognising the urgency of accelerating consenting times and supporting the upgrade of the electricity grid. Such responses welcomed the alignment of this proposal with progress towards meeting grid capacity for Clean Power 2030 and Net Zero targets in 2050. Endorsing the CSNP was viewed as a means of delivering an established and defined need case for such infrastructure.

Many respondents supported the proposal in principle but emphasised that a streamlined planning process should not come at the expense of environmental safeguards. These responses stressed the importance of protecting rural landscapes and minimising the visual and ecological impact of new energy infrastructure. In doing so, a few respondents supported the retention of case-by-case environmental assessments, to protect irreplaceable habitats.

Concerns were raised by a few respondents about the wording of this section of the draft NPS. Specific terms such as “*strategic parameters*” and “*strategic solution*” were described as ambiguous. These respondents argued that clearer language was needed to avoid misinterpretation at later stages of the consenting process.

Some of the responses that disagreed with the proposal were received from members of the public. Many of these did not expand on their response.

Further suggestions:

Some respondents raised points that extended beyond the scope of this section of the NPS review. Such points included seeking a recognition of renewable energy sources, such as solar. Additionally, a few comments were made on coordination amongst developers, and the challenges involved in this process.

Government response:

Government acknowledges the even split between those who supported the proposed endorsement of the CSNP and those who did not support it. Endorsing the CSNP will accelerate consenting times, which is critical to delivering grid infrastructure at the pace necessary to meet Clean Power 2030 and Net Zero targets.

The CSNP endorsement in EN-5 will be progressed with some amendments. In response to concerns raised during the consultation, new language has been introduced to address ambiguity surrounding the definition of strategic parameters. Specific terms that may have caused misinterpretation have been reviewed, with wording updated to improve clarity.

Government can also confirm that the CSNP will consider community and environmental impacts as part of its assessment. The CSNP will be subject to statutory environmental assessments. Further information on this will be made available in the CSNP methodology, which will be published at the end of 2025. Additionally, individual project-level assessments will remain a part of the statutory planning process, but are not endorsed within this amendment as the CSNP is a strategic-level plan.

In relation to responses on wider energy policy, the CSNP will provide strategic recommendations on transmission infrastructure needed to facilitate connection of electricity generation modelled in the chosen SSEP pathway; the CSNP itself will not determine electricity generation technology or type.

In relation to the request for more information on the CSNP approach to co-ordinated designs (where projects share infrastructure before joining the grid), this will be provided by NESO via the CSNP methodology.

Question 6. Do you have any comments on the proposal?

Summary of responses:

There was a relatively even split between positive and negative responses, with a smaller number of neutral responses.

In response to this question, many respondents reiterated points made in response to Question 5, whilst some raised new concerns around the timeline for endorsing the CSNP and opportunities for community and stakeholder input. Some respondents recognised that the proposal to endorse the CSNP and accelerate planning consenting times to support timely upgrading of the electricity grid is an improvement from the current approach to strategic network planning.

Comments from respondents:

Some respondents reiterated their support for the CSNP proposal, viewing it as a positive step towards more strategic and integrated planning. This support was linked to the proposal’s

potential for improved clarity and efficiency, with the endorsement reducing uncertainty for developers and communities. A few respondents also recognised in their support, that the CSNP methodology is still being determined.

Some respondents focused on concerns about the timing of the CSNP's publication. Respondents questioned the appropriateness of endorsing the CSNP ahead of its anticipated publication in 2027. A few respondents questioned whether this would lead to a rushed consenting process, with reduced scrutiny. A few respondents referenced the need to monitor and revise the NPS to reflect CSNP development, in response to emerging energy demands.

Many respondents pointed to the importance of robust stakeholder and community engagement, with effective dialogue throughout. A few respondents linked this to the potential for stakeholder updates throughout the process, in order to explain community impacts, particularly in areas likely to be directly affected by new infrastructure. Concerns were raised about a perceived imbalance of interests, with some respondents fearing that commercial interest may be prioritised over community interest as a result of this amendment to endorse the CSNP.

Further suggestions:

A few respondents questioned how LPAs would be equipped to apply the CSNP endorsement in practice. Some also sought clarification on how the CSNP will coexist with other planning products, such as the Local Area Energy Plan (LAEP), the Regional Energy Spatial Plans (RESPs) and the SSEP, and whether the overall system would be coherent. Additionally, a few respondents raised concerns about government's position that overhead lines should be the strong starting presumption for electricity network developments, citing reasons such as the unpopularity of pylons and a desire for a consistent starting presumption across England, Scotland and Wales.

Government response:

Government acknowledges the further comments on this proposal made by respondents. These points have been considered and in response, a reference to the interaction between the CSNP and SSEP has been added to the updated EN-1. Further information on how the CSNP will interact with other planning documents will be provided by NESO through their wider stakeholder engagement programme on the strategic network plans which will take place after the CSNP methodology is finalised.

Government can confirm that the amendment to the NPS enables endorsement once all steps of the CSNP and statutory environmental assessments have been finalised and published. The CSNP will be updated iteratively, on a triennial basis, and NPS endorsement will apply to future iterations of the CSNP once finalised, making it flexible to necessary changes. Should the NPS need to be amended due to CSNP developments, this will be possible in a future review of the NPS. The CSNP methodology, plan, and environmental assessments will also be subject to public consultation in line with the NPS amendment.

On points raised beyond the scope of this consultation question, NESO's CSNP process will include consideration of community impacts as part of its assessment approach. It will be

transparent and inclusive, allowing for stakeholder engagement, and it will include opportunities for stakeholders to submit electricity network proposals.

Additionally, there is no Great Britain-wide planning policy on new electricity network developments because certain elements of planning and consenting for electricity infrastructure projects are devolved.

Government acknowledges concerns raised regarding its position, detailed in EN-5, that overhead lines should be the strong starting presumption for new electricity network developments. Having considered the feedback, government maintains its position that the starting presumption remains appropriate and accordingly will remain unchanged. Undergrounding is estimated to be four and a half times more expensive than overhead lines[4]. Given the cost of building this infrastructure is borne by electricity bill payers, it is paramount we keep costs down. In addition, overhead lines are much quicker to build, cause less environmental damage and are easier to repair and interconnect with existing circuits.

The CSNP process will however allow for alternatives to overhead lines, such as High Voltage Direct Current (HVDC) undergrounding, to be assessed and recommended where they align with the strategic principles of the CSNP and perform optimally under assessment.

[4] Mott McDonald and the Institute of Engineering and Technology, 2025, A Comparison of Electricity Transmission Technologies: Costs and Characteristics. Available [online] at: 100110238_001-rev-j-electricity-transmission-costs-and-characteristics_final-full.pdf

Reference to the Electricity Transmission Design Principles

7. Do you agree with the proposal in EN-5 to reference the ETDP and to set out that developers should have regard to the ETDP, as relevant, in addition to the Holford and Horlock rules?

8. Do you have any comments on this proposal?

Summary of responses:

Responses to Questions 7 and 8 were mixed. While some respondents supported the inclusion of the Electricity Transmission Design Principles (ETDP) in EN-5, some respondents expressed concern, and some respondents did not know. Most respondents who were unsure or opposed the proposals were members of the public, while most respondents who supported the inclusion of ETDP were from the energy sector.

Comments from respondents:

Of those respondents who welcomed the proposal to reference the ETDP in EN-5, most suggested further considerations for matters to be covered in the ETDP and/or requested to be consulted on the draft proposals themselves.

Some respondents, most of whom were from the energy sector, requested that the Holford and Horlock rules (guidelines on the routeing and siting of new overhead transmission lines) are retained alongside the ETDP within EN-5, stating that they are tried and tested industry standards which play a crucial role in good design.

Some respondents raised concerns about referencing the ETDP in EN-5, as they have not yet been published or consulted on. In addition, a few respondents suggested that the ETDP should also apply to electricity distribution infrastructure within the scope of EN-5. A few respondents requested greater clarity on how applicants should have regard to the ETDP, including calls for worked examples, clear definitions, and guidance on how to balance competing priorities such as cost, environmental impact, and community views. A few respondents also suggested additional principles seeking to balance the impacts of network developments against their benefits and allowing for flexibility to accommodate site-specific circumstances. A few respondents asked for government to clarify the scope of electricity infrastructure covered by the Offshore Wind Environmental Standards (OWES) and any potential overlap with the ETDP.

Further suggestions:

Some respondents raised concerns with the government's position, set out in EN-5, that overhead lines are the default design position of all nationally significant electricity network development projects, within certain conditions. Some respondents asked for further detail in EN-5 to outline how applicants should assess the impacts of offshore electricity transmission infrastructure as part of their NSIP applications and to outline the further decision-making considerations for the Secretary of State for these types of NSIP applications. A few respondents requested changes to the policy within EN-5 on bird strikes to clarify the risks posed to birds by electricity network developments.

Government response:

Government welcomes the feedback received on the proposal to reference the ETDP in EN-5. The government has considered the concerns about referencing the ETDP in advance of consultation and publication. The ETDP will guide the design of network reinforcements submitted into future strategic network plans, such as the upcoming CSNP which will commence in the first half of 2026. The CSNP will recommend the strategic parameters of transmission network reinforcements to help the planning and consenting, regulatory, and supply chain processes. Therefore, government considers it necessary that the ETDP is applied consistently throughout the process of transmission infrastructure design, from strategic to detailed project design, and will retain the reference in EN-5 to have regard to the ETDP, once published. The definition of the ETDP and supporting glossary definition has been updated to provide further clarity and align with terminology included in the emerging ETDP.

The government also considered comments raised about the ETDP's relationship with the Holford and Horlock rules. Whilst noting the importance of early adoption of the ETDP, we recognise that it would be impractical to endorse the ETDP prior to its publication. We have therefore retained wording which details that, once the ETDP is adopted, applicants should have regard to the ETDP as relevant, in addition to the Holford and Horlock rules. The government will consider whether it is appropriate for the ETDP, or future iterations of the ETDP, to replace the Holford and Horlock rules entirely in due course.

In regard to extending the scope of the ETDP to include electricity distribution infrastructure, the principles were originally recommended by the Networks Commissioner, Nick Winser, for the acceleration of transmission infrastructure[5]. Given the differing functions and designs of distribution infrastructure, extending the scope is unlikely to be feasible without delaying publication of the ETDP.

Government has also considered the requests made by some respondents for additional matters to be covered by the ETDP and/or requests to be consulted on draft proposals themselves. Suggestions made by respondents that relate to the ETDP, including the scope, content and consultation, have been shared with NESO for consideration in the next phase of the ETDP development. NESO are consulting on the draft ETDP which closes on 26th October and we encourage stakeholders with views on the ETDP to respond to that consultation[6].

The government has considered suggestions to clarify the scope of electricity infrastructure covered by the OWES and the ETDP. The OWES will cover electricity transmission connections between offshore electricity generation projects and the onshore transmission systems. The ETDP will cover all onshore and offshore transmission infrastructure, including offshore elements of the 'onshore' transmission system (such as bootstraps). Updated wording has been provided within EN-3 to clarify the scope of electricity infrastructure included within the OWES.

[5] DESNZ, 2024, Accelerating electricity transmission network deployment: Electricity Networks Commissioner's recommendations. Available [online] at: Accelerating electricity transmission network deployment: Electricity Networks Commissioner's recommendations - GOV.UK

[6] https://www.neso.energy/what-we-do/strategic-planning/strategic-energy-planning-sep-publications-consultations-and-updates

The government has carefully considered the suggestion to provide further guidance in EN-5 for applicants on how to assess offshore transmission infrastructure and what the Secretary of State considers when making decisions on offshore transmission infrastructure NSIP applications. EN-3 already sets out relevant policies for offshore wind, which apply both to transmission infrastructure associated with offshore wind and to offshore transmission infrastructure more broadly. The government has provided further clarity within EN-3 and EN-5 that the policy within EN-3 is applicable to offshore electricity transmission infrastructure and the definition of offshore electricity transmission infrastructure within EN-1, EN-3 and EN-5 has been updated accordingly. In addition, EN-5 has been updated to clarify the considerations relevant to the Secretary of State when determining NSIP applications involving offshore electricity transmission infrastructure, ensuring alignment with the broader policy framework set out in EN-1 and EN-3.

The government acknowledges that some respondents raised concerns regarding the government's position, detailed in EN-5, that overhead lines should be the strong starting presumption for new electricity networks development. Having considered the feedback from respondents, the government maintains its position that the starting presumption remains appropriate for reasons of efficiency and reducing environmental damage. Further detail is provided above in the government response to consultation on Question 6.

The government has carefully considered the requested changes to the wording on bird strikes relating to electricity network infrastructure. We have made some changes to wording to better acknowledge the role of mitigation in reducing the risk of collisions and potential deaths. However, we did not adopt other suggested changes relating to bird strikes, as the evidence available does not conclusively provide a clear justification for material amendments.

Other Comments

9. Do you have any comments on any aspect of the draft energy NPSs or their associated documents not covered by the previous questions?

Summary of responses:

Respondents approached this question in various ways. Members of the public in particular raised general concerns relating to the NPSs and NSIP system, with some providing the context of local planning consents. Several respondents used the open format to submit letters and emails that provided responses to Questions 1-8, requesting clarifications and suggesting drafting or technical amendments to EN-1, 3, and 5.

Comments from respondents:

Some responding members of the public provided feedback regarding the government's overall energy policy, including the Clean Power 2030 and Net Zero 2050 targets. Concerns raised included the potential environmental effects of building new energy infrastructure at pace, as well around implications for food production and rural landscapes.

Some members of the public also commented on the NSIP system (under the Planning Act 2008 regime) noting that applications are highly likely to be approved once submitted. A few respondents expressed the view that recent decisions to consent NSIPs may be influenced by the government's clean power targets rather than decided strictly on planning matters.

A few respondents highlighted the issue of the cumulative impact associated with the building of multiple NSIPs in a single area. They mentioned possible adverse effects on rural land, the environment, and residents' quality of life. Specific examples were cited to illustrate these points. There was a view among some that the current NPSs may not sufficiently address cumulative impacts.

Several respondents requested amendments regarding technical details or clarification of terminology, as well as improved consistency across the NPSs. For example, a few respondents made comments on the use of the term "*overplanting*" in relation to solar energy. There were also calls for further guidance, such as on Biodiversity Net Gain.

Government response:

Government notes the concerns around its energy policies. The government's mission is for Clean Power by 2030 and net zero by 2050 because clean, homegrown energy is the best way to protect billpayers and boost Britain's energy independence. Securing Britain's clean energy future will require improving infrastructure to get low carbon energy connected to the grid. Without this infrastructure, government will never deliver clean power for the British people. In June 2019, the UK become the first major economy to legislate for a 2050 net zero greenhouse gases emissions target through the Climate Change Act 2008 (2050 Target Amendment) Order 2019. The government published the Clean Power 2030 Action Plan on 13th December 2024 which sets out an ambitious package of legislative and non-legislative reforms to the planning system to ensure the Clean Power 2030 target is achievable. The updates to the energy NPSs are an important step in achieving these targets.

The government notes members of the public's concerns about the cumulative impacts of multiple developments in a single area. By law, all proposals which are subject to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 require an assessment of the cumulative likely significant effects of the proposed development on the environment with other existing and, or approved projects. EN-1 states that applicants must assess the impacts of a proposed development across a range of receptors which include, but are not limited to, biodiversity, population, land, soil, the landscape and cultural heritage, and the interaction between them. Where potential impacts have been identified, applicants must show how negative likely significant effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy. In relation to solar projects, EN-3 sets out how decision-makers should consider the impact of cumulative impacts, for example where a number of solar projects are deployed in close proximity. If designed carefully, the visual impact of a well-planned and well-screened solar project can be properly addressed within the landscape. The planning system works to balance the need for solar deployment with visual impacts and other environmental factors.

The government notes the concerns that have been raised to the effect that recent NSIP applications have been decided on grounds not relevant to planning. When making a decision on a proposed development under the Planning Act 2008, the Secretary of State is required to take into account a number of factors as set out in Section 104 (for decisions where an NPS has effect) and Section 105 (for decisions where no NPS has effect). In reaching a decision, the Secretary of State will weigh the potential benefits against the adverse effects across a broad range of receptors which are detailed throughout the NPSs. Whilst many NSIP applications are consented, this relates to the high level of preparedness and pre-application work expected for prospective NSIPs and also reflects compromises that are made during the planning examination stage to mitigate a scheme's adverse effects.

The government thanks respondents for recommendations on textual changes and clarifications, many of which have been incorporated and can be found across the final versions of EN-1, EN-3 and EN-5.

Next steps

The NPSs will be laid in Parliament for a 21-sitting day ‘consideration period’, before being published on GOV.UK.

Once published, the updated 2025 NPSs (EN-1, EN-3 and EN-5) will have effect in relation to applications for development consent accepted for examination. For applications that have been accepted for examination before publication of the updated 2025 NPSs, the 2024 versions will underpin planning decisions.

This publication is available from: www.gov.uk/government/consultations/planning-for-new-energy-infrastructure-2025-revisions-to-national-policy-statements

Any enquiries regarding this publication should be sent to us at: energyNPS@energysecurity.gov.uk

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