

ICE submission to the Department for Energy Security & Net Zero consultation on the revised energy National Policy Statements (NPS)

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Introduction

Established in 1818 and with over 95,000 members worldwide, the Institution of Civil Engineers exists to deliver insights on infrastructure for societal benefit, using the professional engineering knowledge of our global membership.

For more information, please contact:

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1. Do you agree with the glossary definition for CNP?

Yes, however in order to differentiate CNP from initiatives such as the NPS (National Policy Statement), BESS (British Energy Security Strategy), NSIPs (National Significant Infrastructure Projects), CSNP (Centralised Strategy Network Plan), OWEIP (Offshore Wind Environmental Improvement Package) and ONTR (Offshore Transmission Network Review) it will be important for the government to review the potential overlap between these areas. This could also provide an opportunity to simplify and reduce the number of these initiatives and or documents to set a clearer direction of travel for infrastructure delivery.

2. Do you agree with the new guidance added to draft EN-1, draft EN-3 and draft EN-5 on the CNP for offshore wind, supporting onshore and offshore network infrastructure, and related network reinforcements?

Specifically, do you agree that this policy will:

a. support government ambitions to deploy up to 50GW of offshore wind by 2030, including up to 5GW of floating wind?

Yes, however it is important that this policy supports the deployment of offshore wind without being to the detriment of other zero or low carbon energy generating assets. Rather than limit floating wind to 5GW, it is also important to allow flexibility to be able to extend ambition even further and accelerate the deployment of offshore wind.

b. support government objectives to streamline the offshore wind consenting process?

Yes, as above.

3. Do you agree with the new text included in Section 2.8.103 of draft EN-3 relating to the Offshore Wind Environmental Standards?

Yes, but with an explanation of how the two philosophies of accelerating deployment and enhancing marine environment are to be managed, which appear to contradict each other.

Furthermore, an addition indicating that, as well as enhancing the marine environment, the Offshore Wind Environmental Standards will ensure the protection of marine environments would add clarity and provide a starting point for applicants.

4. Do you agree with additions made in relation to strategic compensation and seeking the views of the SNCBs and Defra Secretary of State in Section 2.8.282 of draft EN-3 relating to the Compensatory Measures?

Yes

5. Do you agree that Section 5.5 of draft EN-1 relating to Civil and Military Aviation and Defence Interests, provides a more balanced and up-to-date view on offshore wind impacts of radar, and represents the needs of different stakeholders accurately?

Yes

6. Do you agree with new guidance added to Section 2.8 of draft EN-5 on the inclusion of strategic planning as a consideration to support the needs case for electricity network infrastructure?

Yes

7. Draft EN-5 includes a strong starting presumption for overhead lines for electricity networks developments outside nationally designated landscapes, which was consulted on in 2021. Do you agree?

Yes

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

The ICE encourages the UK Government to keep National Policy Statements up to date as going much beyond 5 years risks delays to projects and negatively impacts on ensuring the public gets the infrastructure they need. The ICE congratulates the Department for Energy Security & Net Zero on updating the Energy National Policy Statements.

Future National Infrastructure Strategies should be published either as, or with, National Policy Statements for infrastructure, and existing Statements should be updated. This would close the loop to ensure strategy drives planning and development, including providing guidance for regulators for price reviews, which is crucial over the next decade. The Department for Levelling Up, Housing and Communities published 2021 guidance on reviewing National Policy Statements,¹ noting that a consideration on whether to conduct a review should be made at least every five years.

The Overarching Energy National Policy Statement is an example of an NPS that provides both a strategic overview as well as specific recommendations on energy infrastructure development.² A single National Policy Statement for infrastructure, as highlighted by ICE in its previous response to the [2021 Energy NPS consultation](#), could achieve the same effect, with the National Infrastructure Strategy (NIS) serving as the strategic element, or first chapter, of that single NPS and sector-specific annexes developed to add specifics for different infrastructure sectors. Such an approach would

¹ DLUHC (2021) [Planning Act 2008: Guidance on the process for carrying out a review of existing National Policy Statements](#)

² Department for Energy Security & Net Zero (2023) [Overarching National Policy Statement for Energy \(EN-1\)](#)

ensure consistency across sectors on issues such as noise limits, where there are currently varying and complex regulations as indicated in [EN-3](#).³

The UK Government's National Infrastructure Strategy indicates that national infrastructure, including energy infrastructure, must be resilient to future climate change and cost-effective mitigations should be incorporated over the whole life cycle of infrastructure assets. In general, nationally significant infrastructure projects (NSIPs) take account of flood risk and the impact of climate change on it, but other climate hazards are not always assessed. This information gap must be filled through the development of detailed National Policy Statements highlighting the climate risks affecting our future and how these can be mitigated through specific standards of protection for each scenario, as highlighted in ICE's recent policy paper on climate resilience and adaptation.⁴

Areas of risk that need to be examined include extreme heat in summer months (alongside how the design and implementation of green infrastructure can address this), potential droughts and power outages. By analysing these risks and how they can be mitigated, measures can be put in place to meet the needs of future communities and protect our national critical infrastructure. National Policy Statements should accurately reflect the challenges and prospective mitigations resulting from climate change and set out requirements for necessary action. This would also support meeting the UN SDGs regarding resilience.⁵

³ Department for Energy Security & Net Zero (2023) [National Policy Statement for Renewable Energy Infrastructure \(EN-3\)](#)

⁴ ICE (2023) [ICE policy position statement: how can the UK's infrastructure system be made more climate resilient?](#)

⁵ UK Government (2021) [Implementing the Sustainable Development Goals](#)