

CPRE Response to the Department of Energy Security and Net Zero open [consultation on Planning for new energy infrastructure](#)

Summary

CPRE calls on government to make sure that the planning of big kit energy projects, including power from wind, solar and pylons is inclusive of public consultation, to achieve the optimum benefits for rural areas, whilst avoiding and reducing unnecessary economic, social, and environmental harms. Where harms are justified, they must be properly mitigated or compensated in accordance with the Environment Act 2021.

Consultation scope

The [energy National Policy Statements \(NPS\)](#) set out the government's policy for energy infrastructure, and were last updated in 2024. The current consultation relates to:

- EN-1: Overarching National Policy Statement for energy
- EN-3: National Policy Statement for renewable energy infrastructure
- EN-5: National Policy Statement for electricity networks infrastructure

They set out policy and provide the legal foundations for decision making Nationally Significant Infrastructure Projects (NSIPs) subject to an application via a Development Consent Order (DCO) under s104 of the Planning Act 2008.

EN-1: Overarching National Policy Statement for energy

CPRE understands EN-1 Overarching NPS for Energy has been updated to bring Clean Power 2030 front and centre as the primary policy that the NPSs enable and to enable the planning system to operate more effectively. CPRE calls for the planning system to deliver balanced outcomes.

Questions

Clean Power 2030

CPRE, the countryside charity, believes that responding to the climate crisis is a priority, and we call for unity across all political parties on Clean Power. Otherwise, our vision¹ for a thriving and beautiful countryside for the benefit of everyone in the future is threatened.

It is a fact that the biggest threat facing rural England is the climate crisis and associated impacts, not least the flooding of 60% of our prime farmland², and from biodiversity being in sharp decline. We already import half of our food, and we must strategically plan land use to safeguard future food security, restore nature, as well as energy security, or we will fail younger generations.

Therefore, CPRE broadly welcomes the revised energy NPSs, and the two associated documents, of the Appraisal of Sustainability, and the Habitats Regulations Assessment, which respectively consider the likely impacts arising from proposed infrastructure on the local area in terms of both socio-economic and environmental factors.

In November 2024, our *Electric Dreams* report³, produced jointly with Aldersgate Group and RenewableUK, recommended that a Strategic Spatial Energy Plan (SSEP) should be progressed to remove challenges to consenting of Nationally Significant Infrastructure (NSIP) by helping to avoid clustering of projects in particular rural areas. Consequently, CPRE welcomes the proposed government revisions of the NPSs to include reference to the SSEP.

That said, according to the Wildlife and Countryside LINK⁴, of which CPRE is a member, the Planning and Infrastructure Bill threatens more harm to nature by removing legal protection for wildlife and community greenspace. A better balance is needed so energy infrastructure is delivered in a way that is kind to nature and is supported by rural communities, and it is difficult to know what nature protections are included in the SSEP in advance of its publication, anticipated in Qu.4 of 2026, following a public consultation in Q2.

The revised NPSs for energy must support more strategic land use decisions, based on proportionate evidence bases to ensure transparency, and be grounded in effective, early, public engagement. By doing so, proposals benefit from co-design, which is a best practice, to ensure public benefits are derived, whilst ensuring unnecessary economic, social, and environmental harms are avoided, reduced, and where unavoidable, properly mitigated or compensated. There is a good story in Saxmundham where an 'Empowering Nature Vision' is being progressed, linked to National Grid's plans for a converter station. The process will help to mediate competing interests and act as a catalyst for better change. To do anything less, would risk England's iconic rural landscapes being industrialised, and push biodiversity in further decline, which would set communities against the net zero agenda.

¹ [Our vision - CPRE](#)

² [Building on our food security - CPRE](#)

³ [Report calls for reform to planning system for UK's clean energy transition - CPRE](#)

⁴ [As drafted, the Planning Bill is not the promised win for nature or communities](#)

The recent local elections showed a trend in people voting for parties that have ‘anti-net zero agenda’, which threaten progress on Clean Power and achieving our international, legally binding, greenhouse gas (GHG) reduction targets by 2050, as officers working in the sector are told to find alternative jobs. CPRE wants to ensure people are fully informed by the facts about climate impacts on rural places and that the ‘net zero agenda’ is not weaponisation for short term political gain leading to more environmental harm.

CPRE’s campaign focus remains on rooftop solar. It calls for more ambition, with at least 60% of solar energy to come from rooftops, car parks and brownfield land to make the most effective use of ‘wasted space’. This requires all new builds, including homes, businesses and car parks to have solar PV installed as standard, existing buildings to be retrofitted with solar PV, and thereafter, where justified, a much smaller amount of ground-mounted solar to be planned in accordance with CPRE’s guidance on solar development done well, based on 16 best planning principles to secure development that is ‘truly’ sustainable. The same principles apply to other clean power energy infrastructure. See them in question 3 answer.

We responded to the recent consultation on the Future Homes Standard, pointing out other countries success, such as Germany, where rooftop solar is mandated. We were encouraged by the promise of Keir Starmer, the Prime Minister last month, that from 2027 most new homes will have rooftop solar, but we need confirmation on this and urge for all buildings have solar PV required as standard. We are also responding to the live consultation on solar on car parks and electric charging.

solar debate in the House of Commons raised by Dr Caroline Jonson MP for Sleaford and North Hykeham, which has been besieged by mega solar applications covering 4.62% of its land area, much of it best and most versatile grades 1 to 3a.

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?

The inclusion of Clean Power 2030 policy in EN-1 provides sufficient guidance for developers to a great extent. CPRE applauds the purpose of seeking higher quality of applications, however, the changes won’t deliver this.

The issue of Clean Power being deemed Critical National Priority (CNP) was established by the past update, with a presumption in favour of consent. CPRE opposed the use of CNP applying a presumption in favour, however it does note that EN-1 has a strong steer to the mitigation hierarchy, so harms can be avoided and reduced. However, there ought to be a magnitude of harm that is so large that consent is refused.

We echo the concerns of the RSPB on this, EN-1 4.2.24 refers to “Measures that result in a material reduction in generation capacity for CNP infrastructure are unlikely to be considered to be appropriate as mitigation.” CPRE is concerned that because of this change developers won’t alter site design to reduce environmental impacts, or have operational agreements during periods of the year to avoid unnecessary loss of ecology.

CPRE remains of the view that use of CNP is a rather heavy-handed approach to the delivery of energy infrastructure, and it recommends that a full planning hearing should be relied upon to ascertain that the balance is positive, leaving no stone is left unturned concerning avoidance of environmental harm, according to the precautionary principle. Residual impacts should be minimised in paragraph 3.1.2 on page 23. This is because nature in England is so severely degraded, with the nation in the bottom 10% ranking, so there is an imperative to save what remains, and as early in the process as possible to ensure adequate avoidance and mitigation, and with that public support. What is more, green infrastructure serves climate resilience and sequestering of carbon roles. CPRE has always favoured the precautionary principle when planning NSIP.

Environmental Net Gain (ENG) as a theory is welcome, but the practice is not yet tested over the minimum 30-year period as the Statutory Instruments to bring the Environment Act 2021 came into effect. CPRE wants to understand how the Environment Restoration Fund will be used to secure BNG outcomes.

CPRE agrees that Energy from Waste projects should no longer benefit from CNP policy as they are unsustainable. Likewise, CPRE considers applications that refer to being 'Carbon Capture Ready' should only be allowed to proceed when Carbon Capture Storage is built, as without it is unsustainable.

All NSIP development consented should benefit from a Community Liaison Committee to ensure issues arising from construction, operation, and decommissioning are inclusive of the local community impacted.

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

The inclusion of Critical National Priority provides less guidance for developers to a lesser extent. CPRE wishes for EN-1 to clearly consider the landscape effects arising from projects, not only from the sensitivity of the landscape, but also the nature and magnitude of change proposed by the development, whose specific siting and design make the assessment a case-by-case judgement. Beneficial landscape character enhancements should be included as 'Environmental Net Gain' (ENG) in improved text in EN-1, paragraph 4.6, as currently it is too vague.

The revised wording should seek improvements not only arising by mitigation, but site choice and design. There may be cases where the landscape and visual impacts are so substantial and severe that refusal of a project may be justified. The same is true of other environmental concerns, including heritage and ecological harm, which is set out in paragraph 4.6.10 for Biodiversity Net Gain being applied after compliance with the mitigation hierarchy and does not change or replace the existing environmental obligations.

Previously CPRE argued that CNP had been avoided in planning law for good reason, with merit-based approach to avoid excessive environmental harm being on a case-by-case basis. It is important to promote good strategic options to avoid the loss of high-grade soils, landscape character harm and other adverse effects of development.

The mitigation hierarchy, through appropriate design, mitigations, and off-site compensation conditions that endure for a 30-year period, should inform the application and subsequent examination process to enable a sound decision to be taken.

Calculations of carbon impacts over the lifetime of a development are important to delivering carbon zero developments as established by the Horsehill judgment⁵. Greenhouse gas emission (GHG) assessment in project build and operation is dealt with in EN-1, 5.3.4 but the word that follow concerning the Secretary of State decision making at paragraphs 5.3.11 and 5.3.12 rather undermines the intention of such assessments. The planning system needs to help examination panels of Development Consent Order applications consider the GHG impacts, otherwise the planning decision-taking process is flawed.

Development Consent Order applications should require carbon assessments and clearly set out who is responsible for the construction, operation and long-term management of the offshore wind development and performance monitoring of claimed environmental net gains. A restoration agreement for sites at the point of cessation must be agreed.

Onshore Wind

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

CPRE has a clear preference for offshore wind, but it recognises due to the urgency of action on Clean Power that some onshore wind is necessary as an efficient and low-cost technology, with an important role to play in the UK's energy mix.

The Clean Power 2030 Action Plan estimates the need for 27-29GW of operational onshore wind capacity by 2030, and in December 2024 the government committed to reintroduce onshore wind into the NSIP regime at a threshold of 100MW. CPRE is broadly content with this increase of scale as it means local planning authorities can decide whether large onshore windfarms accord with spatial planning policies as set out in their adopted local plan and have regards to environmental impacts, to any harmful effects arising to heritage, rural landscape, and ecology.

CPRE advocates a strategic approach for onshore wind, so that protected landscapes of National Parks and National Landscapes are protected. Thereafter, landscape sensitivity studies should help identify locations that are least harmful to rural landscapes, and for site design visual impact assessments should be relied upon to ensure there is avoidance, reduction, mitigation and compensation. Typically wind development needs high wind speeds, and paragraph 2.12.8 sets out this is a determining factor; thus, development is typically located at the top of hills, which is the most prominent of location. CPRE calls for landscapes otherwise free from manmade intrusions to remain in a tranquil visual state and urge for our tranquillity mapping to be used to help identify such landscape areas.

⁵ R (Finch) v Surrey County Council & others [2024] UKSC 20

Cumulative impacts need to be considered from in combination effects where more than one onshore wind farm are in proximity (as set out in paragraph 2.1.15). The style and height of turbine needs to be considered as different styles, colouration and heights can lead to a sense of visual clutter.

CPRE has produced guidance of 16 best practice planning principles for justified ground-mounted solar development done well in rural places, which is applicable to other renewables, including, wind power:

1. better spatial planning policies;
2. Include proper community engagement;
3. Identify sustainable locations;
4. Avoid irreplaceable habitats;
5. Target low quality soil;
6. Avoid national landscapes and other sensitive landscapes;
7. Ensure a scale of development appropriate to the surroundings;
8. Promote good site layout and design;
9. Minimise intrusion from site security measures;
10. Avoid light pollution;
11. Deliver genuine biodiversity net gain;
12. Keep public rights of way open;
13. Support the local economy;
14. Assess cumulative impacts;
15. Ensure planning conditions especially for decommissioning; and,
16. Support fair community gain.

CPRE echoes the concerns of the RSPB regarding birds and bats, which are particularly impacted by onshore wind. Particular attention should be taken near to important feeding, breeding and roosting areas of bird and bat species known to be at risk (see paragraph 2.12.89).

Peatland is an irreplaceable habitat. It is supportive of net zero as it sequesters carbon, sucking it out of the air and breathing out oxygen. Although the opposite is true if degraded if developed.

Peatland is rich in rare habitat, important for protected and at risk species and it should be saved from development in accordance with advice of Natural England. However, should government ignore this and allow wind turbines, full surveys should inform the adequate level of mitigation (noting peatland cannot be recreated elsewhere, it is where it is), and peatland restoration secured. Access roads should be minimised, along with other features.

DCO applicants must conduct thorough assessments of any arising impacts from proposed NSIP infrastructure. Independent assessments ensure transparency and accountability, as this topic can lead to difference of opinion, when local people's knowledge of local ecology is not reflected in developer commissioned environmental surveys. Scope and methodology need to be agreed at an early stage of environmental assessment and there is concern that

there is a lack of qualified professional ecologists available and some pooling of data and resources would be helpful.

Offshore Wind

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

As mentioned in answer to question 3, CPRE has a clear preference for offshore wind, subject to the SSEP coordinating locations to avoid and minimise marine ecology impacts from cables lying on the sea bed and sensitive location and design of landing infrastructure. There also needs to be greater coordination between onshore and offshore infrastructure and high voltage transmission and lower voltage district network operator infrastructure to get solar off the ground and harnessed on empty roofspace on homes, public, and commercial buildings across the country. The UK Warehousing Association⁶ has shown harnessing rooftop solar on its largest 20% of warehouses would allow the doubling of installed solar, which would help the government secure Clean Power.

Proposed changes to EN-3 recommends assessment of inter-array wake effects to take place between applicants and those of consented and operational wind farms to inform and support the consideration of potential mitigations. CPRE considers this a reasonable approach and agrees that cumulative impacts need to be considered from in combination effects where more than one offshore wind farm are in proximity.

Electricity Networks Infrastructure

Endorsement of the Centralised Strategic Network Plan

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?

CPRE welcomes that the government is taking a holistic approach to planning transmission infrastructure, which is crucial to meet the rise in demand for low carbon electricity to achieve energy security and the national net zero goal.

CPRE is engaging with the National Energy System Operator on the Strategic Spatial Energy Plan and the Centralised Strategic Network Plan (CSNP) for delivering clean power by 2050. Our aim is for the SSEP and CSNP to reduce the overall impact of energy infrastructure by taking a coordinated view of both the onshore and offshore network. It is important that

⁶ [UKWA Investment Case for Rooftop Solar](#)

proposed changes to NPSs support protection of our rural landscapes and minimise visual amenity impacts through careful planning.

6. Do you have any comments on the proposal?

CPRE is keen to ensure the value of countryside is reflected in decision making as NESO is advising on route options based largely on technical and cost viability and it is important that the economic, social and environmental factors are evenly assessed as rural places contribute to the Treasury through rural sectors, including visitor economy.

CPRE acknowledges that the CSNP process intends to endorse the need case (also, strategic parameters of reinforcements, change control requests that do not deviate from and technology type (strategic parameters of reinforcements, change control requests that do not deviate from the CSNP Strategic Environment Assessment) for projects.

CPRE considers this to be an improvement to the current arrangements, as the wider need for NSIPs is not clearly established merely by a DCO application being submitted; this undermines transparency in the process and erodes public trust in the NSIP regime.

For the avoidance of doubt, CPRE understands that endorsement will not include the indicative routing between recommended infrastructure: routing decisions will be confirmed during the Detailed Network Design process in accordance with appropriate surveys and consultation. As such, routes are subject to change and should not be considered fixed for planning purposes.

CPRE welcomes that the proposed amendment upholds the existing starting presumption for overhead lines outside of nationally designated landscapes within EN-5. Also, that the CSNP will be subject to statutory environmental assessments including a Strategic Environmental Assessment and Habitats Regulation Assessment.

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?

Yes. We believe that the ETDP should allow for a more flexible and nuanced approach to scheme design (including both routeing and the design of towers or undergrounding infrastructure) than National Grid has demonstrated in recent years. However, we have concerns about how the ETDP will be applied in relation to individual schemes (see question 8 below).

It is worth stating that if undergrounding was more routine the cost would reduce, and in any case the costs referred to in the consultation paper seems more than in the experience of the CPRE network.

CPRE hopes as many benefits as possible from undergrounding of cables can be secured, and it recommends that the UK government learn from the example in Denmark⁷, as in 2008, it chose to underground all its cables, in response to public support for landscape character value. It now benefits from uninterrupted energy supply, and improved energy security as a result.

8. Do you have any comments on this proposal?

CPRE has for nearly 100 years championed a thriving and beautiful countryside. There is value in the upgrade of the electricity grid to enable Clean Power by 2050 and to ensure Transmission Owners (TOs) follow a sequential design process that allows them to meet their licence obligations and to comply with planning requirements, including those set out in the NPS, in particular the Holford and Horlock Rules.

We are concerned however that a few significant proposals for network reinforcement, such as the Norwich to Tilbury scheme – are coming forward, and will be effectively finalised, before the ETDP is fully developed and brought into force. This does not give us confidence in the commitment of the government or industry to a more sensitive or sustainable approach.

Our colleagues in Derbyshire have been calling for the routing of pylon infrastructure along the M1 motorway corridor as this would have much less harmful consequence than running it through the Erewash valley, which currently has no manmade intrusions.

We have also been liaising with our Welsh colleagues about landscape harm arising from the Vyrnwy Frankton link, a non-strategic link proposing to cross the Welsh/English border. Better coordination is encouraged.

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

CPRE welcomes continued engagement on energy NPSs as they are refreshed over time to remain relevant and to support sound decision taking based on balancing economic, social and environmental factors.

CPRE agrees with Clean Power Commissioner Nick Winser, in that design guidance has been open to interpretation by different parties. In anticipation the public consultation and publication of the ETDP, CPRE agrees with the proposed change to EN-5 to reference the ETDP, setting out that developers should have regard to the ETDP, as relevant, in addition to the Holford and Horlock rules.

Of note, in recent times nature has been singled out as a ‘blocker’ and CPRE points out this is a flawed narrative. More often it is the market that dictates whether energy infrastructure projects are realised or not.

⁷ [Denmark example](#)

When looking at the Renewable Energy Planning Database, you can see a big difference in applications with approval and those completed. Some big energy companies, have power stations under construction elsewhere and these are taking long periods to be completed, and they are outside the English planning system. People expressing concern for the environment, and nature itself, deserve a higher level of respect. If anything, the planning system itself has failed nature and it needs to be improved to yield better societal and environmental outcomes.

The Royal Town Planning Institute has recently published a report⁸ showing the following stark findings:

- 100% of invertebrate boxes were not in the right place
- 83% of hedgehog highways were not in place;
- 82% of woodland edge seed mixes and 73% of woodland edge plug plantings (of perennials) were missing;
- 75% of bat boxes had not been installed;
- 75% of bird boxes were missing;
- 60% of the areas of wet grassland that are supposed to be sown were missing or had been mown so that species richness had been reduced;
- 39% of native thicket/scrub plantings that were supposed to be provided were In terms of species enhancements and mitigations:
- 39% of trees on planting plans were missing or dead; and
- 48% of native hedges that should have been planted were missing;
- 59% of wildflower grasslands had either not been sown correctly, or had been mown incorrectly so that their species richness had been reduced;
- 85% of hibernacula and refugia for reptiles were not in place; and

CPRE urges government through the NPS revisions to ensure all development, especially national significant scale projects adhere to the Environment Act 2021. Through better strategic land use decisions (see our response to the Land Use Framework) and with support from the Nature Restoration Fund, energy infrastructure could be planned and delivered in an improved way so that nature's recovery is assured for the benefit of all in the future.

CPRE is keen to engage with government on solutions to delivering Clean Power targets by 2030 and legally binding Climate Act 2008 (as revised) targets by 2050 as it is imperative for the future of our countryside and for future generations.

Jackie Copley, MRTPI

Campaigns Lead

29 May 2025

⁸ [rtpi-bng-research-summary.pdf](https://www.rtpi.org.uk/research/rtpi-bng-research-summary.pdf)