



13th December 2023

The Right Honourable Rishi Sunak MP
Prime Minister
10 Downing Street
London
SW1A 2AA

Imminent designation of revised energy National Policy Statements (NPSs) by the Secretary of State for Energy Security and Net Zero

We are writing to express our concern over recent very significant changes to the National Policy Statements on Energy (NPS EN-1 to EN-5), presented to Parliament on 22nd November, that were never consulted on, but which broaden the remit of these NPSs now to include all renewable forms of energy. Because of the importance of these changes to many more people and institutions we are requesting a full re-consultation.

There have been two rounds of consultation on the original 2011 NPSs for Energy, one in 2021 and the other in March 2023. The March 2023 version included a new general presumption in favour of granting consent (EN-1 at 4.1.3) to all renewable energy NSIPs and created a new general outweighing category of Critical National Priority (CNP) (EN-1 at 3.3.59&60) which then applied only to offshore wind infrastructure NSIPs. The consultation allowed respondents only 'Yes', 'No' or 'Not sure' answers to specific questions about the CNP offshore wind proposal (but not to the general 'presumption in favour', which was not even mentioned in the Key Policy Changes document accompanying the consultation) but it is clear that written responses from interested parties lobbied for further changes that appear in the November 2023 version and have not been consulted on. This final version retains the never-consulted 'presumption in favour' clause and extends the CNP category now to include all renewable energy sources, both off-and on-shore, including solar.

These are, in our view, very significant changes which many more members of the public, and others, would have been interested in commenting upon, but have not been given the chance.

In the normal course of events, the Energy NPSs presented to Parliament on 22nd November will be automatically adopted after 21 sitting days and will become the legislation by which all future energy NSIPs are considered. There are increasing numbers of utility scale solar projects >>50MW that are in the NSIP category, and these will be considered under the new NPS EN 'presumption in favour' and CNP category. We believe that increasing public concerns over massive local disruption, and effectively permanent changes in the local landscape brought about by these NSIPs, will be ignored.

Unless these proposals are changed, or challenged by MPs, we believe the Government has tipped the playing field so much in favour of large area renewable energy projects that, in the absence of an integrated spatial policy on renewables (and any accompanying policy on land-use, for example for growing food), developers in association with willing land-owners will apply for ever larger NSIP solar and other renewable schemes in places that are entirely inappropriate for them and the local, affected populations.

We ask you urgently to withdraw the November 2023 submission to Parliament in order to allow adequate consultation for these far-reaching proposals and a much broader range of people to comment on them.

Yours sincerely,

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Cc

Right Hon. Rishi Sunak MP, Prime Minister
Right Hon. Oliver Dowden CBE MP, Chancellor of the Duchy of Lancaster, and Secretary of State in the Cabinet Office;
Deputy Prime Minister
Right Hon. Victoria Prentis KC MP, Attorney General
Right Hon. Robert Courts MP, Solicitor General for England and Wales
Right Hon. Claire Coutinho MP, Secretary of State, Department for Energy Security and Net Zero
Right Hon. Graham Stuart MP, Minister of State, Department for Energy Security and Net Zero
Right Hon. Simon Hoare MP, Parliamentary Under Secretary of State Department for Levelling Up, Housing and
Communities
Right Hon. Liz Saville Roberts MP, Plaid Cymru Westminster Leader and Shadow PC Spokesperson (Business, Energy and
Industrial Strategy)
Right Hon. Simon Lightwood MP, Shadow Minister (Transport)
Right Hon. Edward Miliband MP, Shadow Secretary of State of Climate Change and Net Zero
Right Hon. Bim Afolami FRSA MP, Chair, Renewable and Sustainable Energy APPG
Right Hon. Peter Aldous MP, Vice-Chair, Energy Costs APPG
Right Hon. Kemi Badenoch MP
Right Hon. Lord Berkeley OBE. The Built Environment Committee
Right Hon. Brendan Clarke-Smith MP
Right Hon. Damian Collins OBE MP
Right Hon. Alex Cunningham MP, Chair, Carbon Capture, Utilisation and Storage APPG
Right Hon. Gareth Davies MP
Right Hon. David Davis MP
Right Hon. Dave Doogan MP, Shadow SNP Spokesperson (Energy Security and Net Zero)
Right Hon. Ruth Edwards MP
Right Hon. Mark Fletcher MP
Right Hon. Lucy Frazer KC MP
Right Hon. James Gray MP, Environmental Audit Select Committee and Vice Chair, Climate and Security APPG
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