

National Policy Statements

EN-1, EN-3, EN-5

About us

Since 1978, Solar Energy UK has worked to promote the benefits of solar energy and to make its adoption easy and profitable for domestic and commercial users. A not-for-profit association, we are funded entirely by our membership, which includes installers, manufacturers, distributors, large-scale developers, investors, and law firms.

Our mission is to empower the UK solar transformation. We are catalysing our members to pave the way for 40GW of solar energy capacity by 2030. We represent solar heat, solar power and energy storage, with a proven track record of securing breakthroughs for all three.

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- Would you like this response to remain confidential? No
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Introduction

Solar Energy UK welcome the opportunity to provide comment on the National Policy Statements (EN-1, EN-3, EN-5). We welcome the Government's commitment to sustained growth of the solar industry and the ambition to deliver of 70GW of solar by 2035.

The weighting in the Powering Up Britain documents and National Policy Statements to maximise deployment of both ground and rooftop solar to achieve our overall net zero targets is very welcomed. Ground-mount solar is one of the cheapest forms of electricity generation and is readily deployable at scale.

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

Solar Energy UK understands that offshore wind is a national priority – as should be all renewable energy generation. While we appreciate the desire to prioritise large scale renewable deployment, given the absolute urgency to deliver against our Net Zero commitments, this should not be at the expense of determining smaller renewable projects, or at the expense of delivering the critical network infrastructure needed to bring online renewable generation located across the country – not just offshore.

We recommend that the designation of Critical National Priority (CNP) infrastructure is extended to onshore low-carbon generation technologies, such as solar. This could expedite the deployment of solar projects by streamlining the consenting regime with improved policy context and increase the likelihood of achieving 70GW solar capacity by 2035.

Question 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?**
- b) support government objectives to streamline the offshore wind consenting process?**

Please refer to our response to Question 1.

Question 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?

No comment.

Question 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?

No comment.

Question 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?

No comment.

Questions 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?

We welcome the Government's commitment in the BESS to strengthen the energy NPS to include more detail on the role of strategic planning of electricity networks, across the network as a whole. We therefore welcome the changes made in the draft energy NPS to:

- Make the criticality of network infrastructure in achieving net zero – and shifting away from fossil fuels – more explicit.
- Re-state the needs case for infrastructure identified in the Holistic Network Design (HND) and the upfront work to consider environmental and community impacts undertaken in the HND.

We also understand the rationale for explicitly recognising the role of the Government-led Offshore Transmission Network Review (ONTR) and the independent regulator Ofgem-led move to a Centralised Strategic Network Planning approach.

However, we recommend that greater emphasis be placed on the needs case for network infrastructure at the distribution level – as well as for transmission. While we appreciate that individual upgrades to the distribution network may not constitute Nationally Significant Infrastructure Projects in and of themselves, the expansion of the distribution network will, non-the-less, represent a very significant proportion of the overall grid capacity that will need to come forward between now and 2035, if we are to meet our 2035 and 2050 decarbonisation targets.

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, we agree with the Government's proposal that the starting presumption should be overhead lines, rather than buried cables, for network developments outside nationally designated landscapes.

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

Agriculture land classification and land type

3.10.14 We are pleased to see the retention of the text within EN-3 stating that "land type should not be a predominating factor in determining the suitability of the site selection." Due to the size of utility-scale solar projects, identifying land which does not include any area classified as Best and Most Versatile (BMV) can be extremely difficult, as noted in the language in 3.10.16. Land type should be considered on a case-by-case basis and weighed against the ability of a proposed development to provide mitigation and enhancement; for example, development on BMV land may have greater potential to deliver biodiversity net gain.

3.10.15 For clarity within EN-3 and all NPS documents, BMV should be clearly designated as grades 1,2 and 3a of the agricultural land classification system.

3.10.17 We welcome the language in the NPS EN-3 which outlines how land used for solar farms can be multifunctional (production of green energy, continuation of some agricultural practises and opportunities to increase biodiversity) and co-located with adjacent technologies such as wind and storage to maximise the efficiency of the land.

Network Connections

3.10.35 - 3.10.38 It should be noted that connection voltage, availability of network capacity, and the distance from the solar farm to the existing network can have a significant effect on the commercial feasibility of a development proposal, and applicants may choose a site based on nearby available grid export capacity. Capacity threshold

3.10.44 We welcome the clarity in EN-3 stating that alternating current (AC) is the correct metric of installed capacity of solar projects. It should be clearly noted that AC has always been the correct technical definition of installed capacity to support any future reviews of planning approvals for existing sites.

To facilitate the true potential of solar deployment, we ask for increased capacity within local planning authorities as well as training to upskill staff to manage applications for larger projects. Local planning authorities in the UK are stretched with limited resources and finances. To reach 70GW of solar by 2035, in addition to other forms of renewable generation, we ask that further funding be provided to planning departments to both upskill and hire additional staff to support the delivery of a strong planning system.

More broadly, we ask that local authority planning teams and members of the planning committee are sufficiently educated on the specifics of planning applications for solar farms e.g., confidence in their understanding of solar technology, material planning issues, what the consequences could be if they overturn positive planning officer recommendations, and information on the appeal process.

Impacts – Biodiversity

3.10.66–3.10.67 The solar industry is committed to the ecological enhancement of land under management as reflected in the Solar Energy UK [Natural Capital Best Practice Guidance](#). It is common practice for all projects going through the planning process to consult ecologists from the start and projects of the NSIP scale will always have an advising ecologist.

Glint and Glare

3.10.93 As acknowledged in the section, solar panels are designed to absorb, not reflect irradiation. Solar panels are at their core designed to absorb as much light as possible, as this is the very nature of the electrochemical reaction through which solar panels generate photovoltaic electricity. Panel manufacturers spend millions in research and development to create high-efficiency anti-reflective coatings to improve the performance of their products which are standard on all commercially available panels.

We appreciate that there may in some instances be a need for glint and glare assessments as part of the application process. However, developers are frequently required to undertake glint and glare assessments even in cases where there are no nearby dwellings or other receptors. This paragraph should specify that any requirements for glint and glare assessments be proportional to the actual irradiance of a panel as per the design and the specific site context. Well-designed and constructed solar farms present little risk to glint and glare. In fact, solar farms are less reflective than many common building features such as windows.

Additionally, we are seeing airports around the UK already operating or installing solar systems; if glint and glare was a concern, these would not be built.

Examples of airports with solar installations include:

- Southend Airport, which has a 120kW installation on its terminal building and a 5MW solar array under its flightpath.[1]
- ·Edinburgh Airport, which is developing an 11-acre solar farm next to its runway. [2]
- ·Stansted Airport, which is planning to install a 14MW solar farm directly to the east of the airport.[3]

[1]<https://southendairport.com/corporate/environmental-responsibility/>

[2]<https://corporate.edinburghairport.com/sustainability/good-things-we-do>

[3]<https://www.stanstedairport.com/community/solar-farm-project/>