

FIVE ESTUARIES OFFSHORE WIND FARM

10.66 CLEAN POWER 2030 PLANNING STATEMENT ADDENDUM

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In preparation of this document Five Estuaries Wind Farm Ltd has made reasonable efforts to ensure that the content is accurate, up to date and complete for purpose.

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DEFINITION OF ACRONYMS

Term	Definition
CNP	Critical National Priority
DCO	Development Consent Order
NESO	National Electricity Systems Operator
NPPF	National Planning Policy Framework
NPS	National Policy Statement
PA 2008	Planning Act 2008
SoS	Secretary of State
VE	Five Estuaries

1.1 INTRODUCTION

- 1.1.1 On 26 March 2024, Five Estuaries Offshore Wind Farm Ltd ('the Applicant') submitted an application to the Planning Inspectorate for a Development Consent Order ('DCO') ('the Application') pursuant to section 37 of the Planning Act 2008 ('PA 2008') in relation to Five Estuaries Offshore Wind Farm (VE) (Planning Inspectorate Scheme Ref: EN010115).
- 1.1.2 On 23 April 2024, the Planning Inspectorate accepted the Application for Examination. The Examination commenced on 17 September 2024.
- 1.1.3 The purpose of this Planning Statement Addendum is to provide an update in respect of the following documents which have been published since the Application was submitted:
 - National Planning Policy Framework (12 December 2024);
 - Clean Power 2030: Advice on Achieving Clean Power for Great Britain by 2030 (5 November 2024);
 - > Clean Power 2030 Action Plan: A New Era of Clean Electricity (13 December 2024).
- 1.1.4 This Planning Statement Addendum should be read alongside the Planning Statement [APP-231] which was submitted with the Application.

2. NATIONAL PLANNING POLICY FRAMEWORK

2.1 CONTEXT

- 2.1.1 In accordance with the PA 2008, National Policy Statements ('NPSs') set out the policy basis upon which the Application for the Project will be determined.
- 2.1.2 In addition, the National Planning Policy Framework ('NPPF') is one of the documents that may be considered important and relevant to the decision by the Secretary of State (the 'SoS') for Energy Security and Net Zero.
- 2.1.3 The Planning Statement [APP-231] refers to the version of the NPPF which was published on 20 December 2023 (hereafter referred to as the '2023 NPPF') and current at the time of submission of the Application. A revised version of the NPPF¹ (hereafter referred to as the '2024 NPPF') was subsequently published on 12 December 2024.
- 2.1.4 The 2024 NPPF maintains the same overall aim to achieve sustainable development by pursuing economic, social and environmental objectives, as well as much of the detailed text that was included in the 2023 NPPF.
- 2.1.5 Of particular relevance to the Project, the 2024 NPPF retains and strengthens the wording of the 2023 NPPF in respect of meeting the challenge of climate change, stating at paragraph 161 that the planning system should support the transition to net zero by 2050, help to shape places in ways that contribute to radical reductions in greenhouse gas emissions and support renewable and low carbon energy and associated infrastructure.
- 2.1.6 The detailed assessment of the Project against the 2023 NPPF which is provided in the Planning Statement [APP-231] and the accompanying Policy Compliance Document [APP-232] has been reviewed with regard to the 2024 NPPF to identify any material changes that could affect the document's conclusions, and it is considered that there are no material changes to the Planning Statement's conclusions.
- 2.1.7 Particular points in the 2024 NPPF that the Applicant wishes to highlight are set out in the table below.

Table 1: NPPF 2024 Commentary

2023 NPPF Paragraph	Equivalent Reference in 2024 NPPF
Paragraph 157 of 2023 NPPF	Paragraph 161 of the 2024 NPPF now refers specifically to "net zero by 2050" (whereas the 2023 NPPF referred to "low carbon future") and has been expanded in respect of climate impacts to read: "The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change"

¹ https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf

2023 NPPF Paragraph	Equivalent Reference in 2024 NPPF		
	The 2023 NPPF wording "contribute to radical reductions in greenhouse gas emissions" is retained in paragraph 161 of the 2024 NPPF, which now states: "It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure."		
	Section 5 of the Planning Statement [APP-231] sets out the need, case for and benefits of VE, including VE's meaningful contribution to the UK's legally binding net zero commitment (i.e. achieving net zero carbon emissions by 2050 in accordance with the Climate Change Act 2008 (as amended)).		
	The Applicant has undertaken a climate change resilience assessment for the Project, and has included this within each ES chapter. This includes consideration of overheating, storms and drought, coastal change and flood risk.		
	The Applicant undertook flood risk assessments for the Export Cable Corridor [APP-038] and the Onshore Substation [APP-039] as well as for Lesser Black-Backed Gull [APP-226] which identify and assess the risks of all forms of flooding to and from the Project and demonstrates how these flood risks will be managed, taking climate change into account.		
	No material change to Planning Statement conclusions		
Paragraph 163 of 2023 NPPF	2023 NPPF wording to "not require applicants to demonstrate the overall need for renewable or low carbon energy" is retained in paragraph 168 part (a) of the 2024 NPPF and the words "give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future" inserted.		
	2023 NPPF wording to "approve the application if its impacts are (or can be made) acceptable" has been omitted from the 2024 NPPF.		
	Section 5 of the Planning Statement [APP-231] concludes that the benefits of the Project, particularly the delivery of new offshore wind generating capacity, are overwhelmingly greater than the residual adverse effects and there is a clear and compelling case in favour of the DCO being made.		
	No material change to Planning Statement conclusions		

- 2.1.8 This review demonstrates that in many cases the 2023 NPPF wording has been retained in the 2024 NPPF and that, where changes have been made to the wording of the 2024 NPPF, those changes do not materially alter the conclusions of the Planning Statement [APP-231], in particular those set out in section 4.5 of the Planning Statement [APP-231].
- 2.1.9 In summary, VE benefits from up to date, authoritative policy support. Not only does national policy establish an urgent need for new, low carbon energy generation, it specifically identifies offshore wind as a key part of the government's strategy for low-cost decarbonisation of the energy sector. VE is considered to be consistent with the NPPF and other important and relevant planning policies.

3. CLEAN POWER 2030

- 3.1.1 The recently released Clean Power 2030 Advice strongly advocates for VE, which is a large-capacity offshore wind renewable energy project. Aligned with the government's Clean Power 2030 Action Plan, VE is committed to providing the UK with reliable, clean, secure, and affordable energy, with operations set to begin in 2030 and continue for up to 40 years.
- 3.2 CLEAN POWER 2030: ADVICE ON ACHIEVING CLEAN POWER FOR GREAT BRITAIN BY 2030
- 3.2.1 On 5 November 2024 the National Energy System Operator ('NESO') published its advice on achieving clean power by 2030 to the Secretary of State ('SoS') for Energy Security and Net Zero in response to their request for advice in August 2024.
- 3.2.2 The advice has three overarching 'key messages':
 - "1. Clean power is a huge challenge but is achievable for Great Britain by 2030.
 - 2. Clean power will require doing things differently. It will only be achieved with bold action and sustained momentum, across every area and every step of the way between now and 2030.
 - 3. Achieving clean power by 2030 will put Great Britain in a strong position."
- 3.2.3 The report identifies:

"There is no path to clean power without mass deployment of offshore wind, together with onshore wind and solar. Sustained rollout of offshore wind is needed at over double the highest rate ever achieved in Great Britain."

3.2.4 Chapter 2 of the advice sets out the core elements of a clean power system to be delivered by 2030. It identifies the need for the significant growth of renewable technologies:

"Significant growth in offshore wind (from 15 GW in 2023 to 43-50 GW in 2030), onshore wind (14 GW to 27 GW), solar (15 GW to 47 GW) and battery storage (5 GW to over 22 GW) is needed to displace gas, to meet growing demand and to replace retiring plants."

3.2.5 With regard to the speed of wind delivery, the advice is clear:

"Wind and solar technologies already have a strong track record of delivery and have seen rapid growth in recent years. A further scale-up in delivery is needed across the key technologies for clean power by 2030."

- 3.3 CLEAN POWER 2030 ACTION PLAN: A NEW ERA OF CLEAN ELECTRICITY
- 3.3.1 The Government's Action Plan² was subsequently published on 13 December 2024 and sets out the Government's pathway to achieving a clean power system by 2030.
- 3.3.2 The Foreword by the SoS for Energy Security and Net Zero states:

"We will usher in a new era of clean electricity for our country, with our plan to deliver the most ambitious reforms to our energy system in generations...

 $^{^2\} https://assets.publishing.service.gov.uk/media/675bfaa4cfbf84c3b2bcf986/clean-power-2030-action-plan.pdf$

This plan sets out how the government will work with the clean power sector, including industry, trade unions, investors, policy makers and others to achieve our clean power goal. 2030 is just six years away, and we are under no illusions about the scale of the task ahead, but mission-driven government is about acting with urgency and determination to rise to the challenges we face...

As the Prime Minister has made clear, clean power is an urgent priority for our country. The clean power sprint is the national security, economic security, and climate justice fight of our time - and this plan gives us the tools we need to win this fight for the British people."

- 3.3.3 The Action Plan explains that Clean Power means that by 2030, Great Britain will generate enough clean power to meet our total annual electricity demand, backed up by unabated gas supply to be used only when essential. The objective is that clean sources produce at least 95% of Great Britain's generation.
- 3.3.4 The Action Plan explains that successful delivery will require rapid deployment of new clean energy capacity across the whole of the UK. It states:
 - "We have high ambition. That means 43-50 GW of offshore wind, 27-29 GW of onshore wind, and 45-47 GW of solar power, significantly reducing our fossil-fuel dependency. These will be complemented by flexible capacity, including 23-27 GW of battery capacity, 4-6 GW of long-duration energy storage, and development of flexibility technologies including gas carbon capture utilisation & storage, hydrogen, and substantial opportunity for consumer-led flexibility."
- 3.3.5 Table 1 of the Action Plan (extract below) identifies that the current installed capacity of offshore wind is 14.8 GW and the Department for Energy Security and Net Zero 'Clean Power Capacity Range' for 2030 is 43-50 GW.

Table 2: Extract from Table 1 of the Clean Power 2030 Action Plan

Technology	Current installed capacity (GW)	NESO 'Further Flex and Renewables Scenario' (GW)	NESO 'New Dispatch Scenario' (GW)	DESNZ 'Clean Power Capacity Range' (GW)
Offshore wind	14.8	51	43	43 – 50

4. CONCLUSION

- 4.1.1 The review of the 2024 NPPF demonstrates that the changes made to the 2023 NPPF do not materially change the conclusions of the Planning Statement [APP-231]. In summary, VE benefits from up to date, authoritative policy support. Not only does national policy establish an urgent need for new, low carbon energy generation, it specifically identifies offshore wind as a key part of the government's strategy for low-cost decarbonisation of the energy sector. The Project is considered to be consistent with the NPPF and other important and relevant planning policies.
- 4.1.2 NESO's recent advice to Government (Clean Power 2030) and the Government's subsequent Clean Power 2030 Action Plan underscore the significant and urgent national challenge of delivering clean energy by 2030. Additionally, the National Policy Statements (NPSs) clearly designate offshore wind generation as Critical National Priority (CNP) infrastructure. These documents collectively highlight the urgent need for the rapid deployment and substantial scale-up of offshore wind capacity.
- 4.1.3 In essence, accelerating additional offshore wind generating capacity is considered to be critical to reaching clean power by 2030, thereby further strengthening and supporting the case for VE and the benefits that it will deliver.



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