



By email: energyNPS@energysecurity.gov.uk

Uniper UK Limited

Compton House
2300 The Crescent
Birmingham Business Park
Birmingham B37 7YE
www.uniper.energy

Uniper

Registered in
England and Wales
Company No 2796628

Registered Office:
Compton House
2300 The Crescent
Birmingham Business Park
Birmingham B37 7YE

Response to: Planning for new energy infrastructure: 2025 revisions to National Policy Statements

29 May, 2025

About Uniper

Düsseldorf-based Uniper is a European energy company with global reach and activities in more than 40 countries. With approximately 8,000 employees, the company makes an important contribution to security of supply in Europe, particularly in its core markets of Germany, the UK, Sweden and the Netherlands.

Uniper's operations encompass power generation in Europe, global energy trading, and a broad gas portfolio. Uniper procures gas—including liquefied natural gas (LNG)—and other energy sources on global markets. The company owns and operates gas storage facilities with a total capacity of more than 7 billion cubic meters.

Uniper intends to be completely carbon-neutral by 2040. Uniper aims for its installed power generating capacity to be more than 80% zero-carbon by the early 2030s. To achieve this, the company is transforming its power plants and facilities and investing in flexible, dispatchable power generating units. Uniper is already one of Europe's largest operators of hydropower plants and is helping further expand solar and wind power, which are essential for a more sustainable and secure future. The company is progressively expanding its gas portfolio to include green gases like hydrogen and biomethane and aims to convert to these gases over the long term.

Uniper is a reliable partner for communities, municipal utilities, and industrial enterprises for planning and implementing innovative, lower-carbon solutions on their decarbonisation journey. Uniper is a hydrogen pioneer, is active worldwide along the entire hydrogen value chain, and is conducting projects to make hydrogen a mainstay of the energy supply.

About Uniper in the UK

In the UK, Uniper owns and operates a flexible generation portfolio of power stations, a fast-cycle gas storage facility and two high pressure gas pipelines, from Theddlethorpe to Killingholme and from Blyborough to Cottam. We also have significant long-term regasification capacity at the Grain LNG terminal in Kent, to convert LNG back to natural gas.

Consultation Response

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 a strong foundation for developers. It clearly sets out the need for rapid deployment of new clean energy generation capacity and establishes ambitious targets. However, we caution that the current framing may place too much emphasis on short-term milestones.

Given that Nationally Significant Infrastructure Projects (NSIPs) typically take many years to plan, consent, and construct, we support the recognition in EN-1 (e.g. paragraph 3.3.18) that Clean Power 2030 is a milestone, not the endpoint. We recommend EN-1 go further by explicitly guiding decision-makers to account for the long-term role of infrastructure such as low-carbon dispatchable power (e.g., CCGT with CCS) in achieving 2050 net zero goals. This will provide confidence for developers investing in projects that may not become operational until the 2030s or 2040s. We support paragraph 3.3.18 of EN-1, which acknowledges the evolving nature of the energy system and the importance of planning for a range of future scenarios, including those where hydrogen plays a greater role. This future-oriented flexibility must be reflected in planning decisions made today. The NPSs are now set to be reviewed every five years, which (if achieved) should ensure that they better reflect evolving policy and legislative changes. This commitment to periodic review is welcome and should help maintain alignment with technological, environmental, and market developments.

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

The updates to the Critical National Priority (CNP) policy are welcome and clearly designate key low-carbon technologies, including CCGT with carbon capture, CCS, hydrogen production, and associated infrastructure such as CO₂ pipelines. This provides developers with a strong foundation and improved investment confidence.

To maximise the effectiveness of this policy, we recommend the NPS provide clearer guidance on how the CNP designation should influence planning decisions, including how the presumption in favour of consent will be applied in practice. To ensure consistency, we recommend that the NPS define what constitutes a "higher-quality" application, including environmental and community impact considerations.

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

We support the reintroduction of onshore wind into the NSIP regime at a threshold of 100 MW. This ensures large-scale projects are appropriately assessed and aligns onshore wind with other low-carbon generation technologies. We recommend the guidance further define best practice for site selection, cumulative impact assessment, and community engagement to address local opposition and support responsible development.

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

We support the strengthened guidance on offshore wind, including clarity around wake effects and developer collaboration. We encourage additional focus on co-location with offshore hydrogen production and grid infrastructure.

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?

Yes.

6. Do you have any comments on the proposal in EN-5 to endorse the electricity transmission recommendations set out in the CSNP?

Yes, we agree with the proposal to endorse the Centralised Strategic Network Plan (CSNP). A system-level approach to network planning is essential for meeting increasing demand for low-carbon electricity and supporting industrial decarbonisation.

Endorsing the CSNP will reduce duplication in project need cases and provide developers with more certainty, accelerating delivery. It is important that the consenting process remains flexible to accommodate projects outside the CSNP envelope. Clear guidance should be provided on how such projects will be evaluated.

We recommend that the NPS set out how CSNP recommendations will be integrated with project-specific planning. This includes guidance on assessing environmental and community impacts early in the process to ensure alignment with local expectations and efficient application development.

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.

8. Do you have any comments on this proposal in EN-5 to reference the ETDP?

Yes, we support referencing the Electricity Transmission Design Principles (ETDP). Providing additional clarity on the types of assets suited to different settings will support better alignment between strategic planning and project delivery.

We endorse CCSA's concern that NESO's infrastructure vision must be translated into regional and project-level planning to fully realise the benefits of strategic coordination.

We recommend that the ETDP include more specific examples of design options for impact mitigation and provide clear guidance on how to balance environmental, landscape, and community considerations with infrastructure needs.

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

We commend the Department for the comprehensive updates to the energy NPSs. We recommend additional guidance be included on:

- Integration of low-carbon technologies (e.g., power + CCS + hydrogen clusters)
- Best practice for implementing biodiversity net gain and strategic compensation
- Balancing urgent infrastructure need with environmental and social outcomes

We also highlight barriers that persist due to the absence of strategic, regional planning for key enabling utilities such as water. Access to water for power and hydrogen projects is increasingly constrained, and planning frameworks must do more to anticipate and coordinate these needs. While water companies are private entities, their regulatory prioritisation of domestic over infrastructure use can significantly hinder major projects. Government and regulators should ensure that critical infrastructure needs are embedded into water resource planning.

Further, regulatory policy should enable greater reuse of water. Statutory consultees often classify treated effluent—destined for surface water discharge—as waste when proposed for reuse in industrial applications. This overly cautious interpretation introduces avoidable permitting delays. Clearer guidance on water reuse and recycled water as a viable industrial input is needed to minimise such barriers.

Additionally, government must ensure the Planning Inspectorate and statutory consultees are sufficiently resourced and trained to assess complex, multi-technology and cluster-based applications. We recommend targeted support for technical expertise in hydrogen, CCS, and integrated energy systems.