



Department for Energy Security & Net Zero

Lord Alan Whitehead CBE
**Department for Energy Security &
Net Zero**
55 Whitehall
London
SW1A 2HP

Kerri Peake
National Energy System Operator
Faraday House,
Warwick Technology Park,
Gallows Hill,
Warwick,
CV34, 6DA

8 June 2026

Dear Kerri Peake,

The National Energy System Operator's Holistic Network Delivery Implementation Plan: Habitats Regulations Assessment

I am responding on behalf of the Secretary of State to your notice of 18 May 2026 regarding the Habitats Regulations Assessment (HRA) of the Holistic Network Delivery (HND) Implementation Plan undertaken by the National Energy System Operator (NESO).

The methodology used for the Appropriate Assessment is adequate and precautionary, albeit with well-described limitations. I note the disagreement between NESO and SNCBs regarding conclusions of adverse effects on integrity in relation to sites designated for red throated diver, but I am content that suitable mitigation measures exist at the plan level and that further assessment and consideration of appropriate mitigation will be conducted at the project level. I do, however, disagree that a requirement to conduct project level HRAs is in itself a mitigation measure in the context of the Habitats Regulations. Rather, mitigation measures are required at the appropriate assessment stage and are applied to avoid adverse effects on integrity of a designated site. Nonetheless, I am content that NESO has adequately assessed the impacts of the plan based on the information available to it, alone and in combination, on protected sites within the National Site Network.

I have considered NESO's assessment of alternative solutions and the advice of SNCBs and I am satisfied that an appropriate evaluation of alternative solutions has been carried out at this stage. I am also satisfied that there are no feasible alternative solutions to the preferred option that would have a lesser effect on the integrity of the sites in our National Site Network, whilst meeting our decarbonisation, renewable energy and energy security ambitions.

There is a compelling and overriding case in the public interest (IROPI) to justify the predicted harm to the National Site Network, premised on the importance of dealing with climate change and meeting our decarbonisation and renewables ambitions, and the need for energy security.

As noted in the HRA there is uncertainty regarding the exact nature and scale of compensatory measures needed for the features identified. Whilst further assessment and evidence to demonstrate effective measures at the project level will be required, I am content that NESO identifies a range of possible measures and that appropriate steps will be taken to ensure that compensatory measures will be in place to ensure the overall integrity of the National Site Network.

I am therefore content that NESO has fulfilled its obligations under regulation 64 of the Conservation of Habitats and Species Regulations 2017, and regulations 29 and 30 of the Conservation of Offshore Marine Habitats and Species Regulations 2017 and that NESO may adopt the HND plan.

The outcome of this plan-level HRA and my decision does not authorise any individual network developments. Further project-level consents and associated environmental assessments including HRA will be required and projects must continue to adhere to their Development Consent Orders. Further evaluation at a project level may result in different conclusions being reached by the Secretary of State on the possibility of adverse effects on integrity. Similarly, this decision does not preclude the Secretary of State from reaching different conclusions regarding alternative solutions, IROPI and the adequacy of compensatory measures when determining any subsequent consent applications.

I am sending a copy of this letter to the Secretary of State for the Environment; Food and Rural Affairs.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Alan Whitehead', with a long horizontal stroke extending to the right.

LORD ALAN WHITEHEAD CBE
Minister for Energy Security and Net Zero