Copenhagen Infrastructure Partners

Planning and Infrastructure Bill Committee,
House of Commons
Westminster
London SW1A 0AA.

Planning and Infrastructure Bill – Call for views 09 May 2025

To whom it may concern,

On behalf of Copenhagen Energy Islands (CEI), I write to submit brief and targeted remarks regarding the importance of future-proofing Bill provisions so as to accommodate future innovation in energy network infrastructure planning.

CEI is a subsidiary company of Copenhagen Infrastructure Partners (CIP)[1]. The remarks in this letter pertain to CEI and not the entirety of CIP's UK portfolio. CIP will respond separately to DESNZ' parallel consultation regarding the re-drafting of NPS EN1,3 & 5 – and welcomes the opportunity to input to the development of these critical planning statements.

Relevance to the Bill's objectives.

CEI proposes to develop an Energy Hub for the Southern North Sea. Its precise location is yet to be established but early development studies have concentrated on the Dogger Bank area – which, among other areas[2], is potentially subject to future development of large-scale Offshore Wind projects.

While such development linked to a 'hub' reduces the need for 'radial' (or 'point to point') connections to shore, other potential advantages of a hub may include cost reduction compared with offshore 'platforms', enablement of offshore Hydrogen production, and facilitation of sector-coupling and system operational flexibility.

While work to validate potential merits and feasibility of such development continues, CEI should like to note its agreement with the intention of the Bill's proposed measures to 'make the planning system less rigid and more strategic, and better able to adapt to current and future infrastructure demands'.[3], More broadly, it is important to align the connection process with future cross-vector(molecules and electrons) strategic network and spatial energy planning.

In the course of its initial exchanges with key stakeholders regarding these plans, CEI observes that there remains a risk that such 'first of a kind' projects fail to progress (albeit similar developments are currently in progress outside UK – notably off the Belgian coast[4]). This may not be for lack of 'in principle' support but for difficulty in the timely establishing of a) the basis for the 'rights' to develop the hub entity and b) consequent regulatory and commercial underpinnings to satisfactorily enable co-existence with other infrastructure asset 'types' - so as to uphold consumer interest and wider market discipline.

[1] See Annex A, P.3

[2] P 21/22, considerations for developing and leasing to 2030 and beyond, The Crown Estate

[3] P.14 https://publications.parliament.uk/pa/bills/cbill/59-01/0196/en/240196en.pdf

[4] https://www.elia.be/en/infrastructure-and-projects/infrastructure-projects/princess-elisabeth-island

In this regard, CEI notes progression of UK Government's commission to enable the National Energy System Operator to develop its spatial and technology capacity envelopes for the future procurement and deployment of energy generation; also the consequent requirements such development will necessitate for Central Strategic Network Planning.

Conclusion and ask

While noting and welcoming the progression of SSEP and CSNP, CEI would nevertheless emphasise the critical importance of future proofing **Bill provisions such that it remains flexible and adaptable to accommodate innovation in future network planning** to the greatest possible extent.

In practical terms, we believe that this should require sustained and very close collaboration between those stakeholders whose collective endeavour is to articulate to investors and the wider industry 'the what, the where and the when' which underpins a planned and co-ordinated approach to facilitating the UK's energy security, industrial and consumer interests.

While I acknowledge the above remarks are fairly narrow in relation to the scope of the Bill, I nevertheless would request the committee to reflect on these points when drawing its conclusions. I hope this contribution will be useful to the committees' work.

If you require any further detail or would like to explore any of the issues raised in the letter, please do not hesitate to contact Rhys Jones, VP Government Affairs and Communications rhjo@cisc.dk; rhjo@cip.dk 00 4479 68 798315 who would be happy to facilitate further discussion.

Yours sincerely,

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Annex A

About CIP
CIP today is the world's largest dedicated fund manager within greenfield renewable energy investments and a global leader in offshore wind. Its UK pipeline of renewable and low carbon infrastructure projects (including fixed and floating offshore wind) now stands in excess of 25GW, representing a forward investment potential of around £40bn, subject to project realisation and attrition.

About CEI
CEI is a company focused on early-stage global development of integrated large-scale offshore wind projects. Specifically, its focus is the development of Energy Hubs (or 'islands') which are designed to gather and distribute 'far from shore' large-scale renewable energy, enabling the deployment and integration of offshore wind.

Annex B
CIP's UK Investments

No.	Platform*/ project name	Technology - Size	Location	Status
1	Borea	Onshore wind – 273 MW	Scotland	Operational.
2	Bute energy*	Onshore wind – 2.2 GW Distribution Network lines – 3x 132kV lines	Wales	Development. A CIP Platform/Partner company.
3	Beatrice	Fixed Offshore wind – 558 MW	Scotland	Operational.
4	Pentland	Floating Offshore wind – 100 MW	Scotland	Development. A CfD AR7 Pot 2 Eligible project.
5	Celtic Sea	Floating Offshore wind – 1.5 GW	Wales	Development. Round 5 tender forthcoming.
6	Ossian	Floating Offshore wind – 3.6 GW	Scotland	Development. A Scotwind site.
7	Alcemi*	Battery energy storage – 4.3 GW	UK wide	Under construction & Development. A CIP Platform/Partner company.
8	Amberside*	Solar – 2 GW	England	Development. A CIP Platform/Partner company.
9	Elgin Energy*	Solar & Battery Energy Storage – 8.5 GW	UK wide	Development. A CIP Platform/Partner company.
11	Slough	Energy from Waste – 50 MW	England	Operational.
12	Lostock	Energy from Waste – 60 MW	England	Under construction.
13	Kent	Biomass – 28 MW	England	Operational.
14	Brigg	Biomass – 40 MW	England	Operational.
15	Snetterton	Biomass – 44 MW	England	Operational.
16	Brite	Biomass – 42 MW	England	Operational.
17	Tarchon	Interconnector (UK – Germany) – 1.4 GW	England	Development.
18	Cronos	Interconnector (UK – Belgium) – 1.4 GW	England	Development.
19	Morecambe	Fixed Offshore Wind – 500 MW	England	Development, potentially eligible in pot3 AR7