

CPRE is the countryside charity that campaigns to promote, enhance and protect the countryside for everyone's benefit, wherever they live. We are pleased to respond to this important consultation and can confirm it is a non-confidential response which we are happy to see published on your website.

With a local CPRE in every county in England, we work with communities, businesses and government, nationally and locally, to find positive and lasting ways to help the countryside thrive.

A key part of our vision is a low carbon countryside that mitigates and adapts to the impacts of the climate emergency. Decarbonising our energy system is an essential part of reaching net-zero GHG emissions, and we recognise that the scale of this challenge means that no technology can automatically be considered off the table. We are calling for a transition to a decentralised, zero-carbon energy system that empowers and benefits local communities, and is delivered in harmony with our natural environment and landscapes.

We have been working for the past two years on the future development of the electricity transmission system, responding to the challenge of carbon net zero, with especial concerns over the environmental (landscape and biodiversity) and amenity (community) impacts of new infrastructure, especially in East Anglia and the wider East Coast area. Together with environmental partners, we engage strongly with key players such as National Grid – Energy Transmission (NG-ET) and are also following the Offshore Transmission Network Review (OTNR) process closely.

Headline response

In summary, we give broad support of Ofgem's proposed measures to encourage the take-up of early opportunities, commensurate with the 'Integrated 2025' scenario from the OTNR Phase 1 report, including new ways to catalyse anticipatory investment.

We are also supportive of centrally planned holistic and detailed design approaches as long as they appropriately integrate:

- offshore and onshore development and link closely to innovative approaches to strategic planning;
- new, more rigorous forms of environmental assessment and inclusion of environmental net gain as part of a new package of best practice and mitigation.

This must link closely with changes in the current Nationally Significant Infrastructure Projects (NSIP) review and the signalled revision of the Energy National Policy Statement (NPS) suite. Neither of these can be considered in isolation to the OTNR process and *vice-versa*.

Early Opportunities

1. Are there any concepts we have not identified developers (as defined in this chapter) may wish to progress?

We do not have any immediate further concepts or variants to identify for developers to progress. Within the concepts currently identified, we would wish to state our strong preference for concepts that emphasise reduction in landing points and number of substations required.

2. Should anticipatory investment risk be shared with consumers? If it should, what level of risk is it appropriate for consumers to bear?

Yes, risk should be shared with consumers to reduce barriers to anticipatory investment (AI). We agree, that as a minimum, this should be a 'kickstarter' sum that 'de-risks' the earliest adoption of integration measures, especially those that help reduce environmental (landscape and biodiversity) and amenity (community) impacts.

3. For concepts that intended to provide a wider system benefit, e.g. by mitigating an onshore constraint, how should the need for investment be demonstrated by the developer?

By reference to demonstrating clear net benefits across economic, social and environmental criteria. Ability to show improved outcomes in terms of reducing infrastructure (by quantity and cost) and landing points needs to be given great weight, even if connection delivery may be delayed.

4. What options are available to developers in demonstrating a reasonable expectation they intend to connect to the system?

N/A

5. To what extent do you agree with our proposals to remove barriers to the Early Opportunity concepts? Please explain your answer.

N/A

6. Do you believe a Significant Code Review is required to give effect to a potential decision to 'share' AI risk between consumers and developers?

N/A

7. Do you agree with Ofgem's proposed approach to deliver the objectives of Early Opportunities work stream?

Broadly yes. We are pleased that Ofgem is addressing early opportunities as we wish to see integration opportunities promoted as soon as possible, both to meet carbon targets earlier and also reduce the environmental impacts of new connections. This approach should seek to be as close as possible to the 'Integrated 2025' scenario from the OTNR Phase 1 report.

Our view is similar to that stated in para.3.5 of this consultation (albeit with the 2030 Pathway section) that *'there is a reasonably small window to effect change' and 'while planned reforms may result in delays in the early development steps... the new approach will speed up later development steps'*. We develop this point further below (see our answer to Question 12) in relation to reforms in strategic planning and consenting opportunities.

Pathway to 2030

8. We consider that a holistic design will result in a more coordinated, economic and efficient network. Do you agree? Please give reasons for your answer.

Yes, we agree, as long as environmental and community impacts are integrated properly into the design, both in terms of appropriate front-loading and testing (via an updated form of strategic environmental assessment(SEA), rather than current Assessment of Sustainability (AoS) methodology or similar) and new best practice standards and/or innovation in terms of strategically planned environmental net gain. There will need to be a strongly integrated approach with that to be taken in the revised Energy National Policy Statements and their upcoming revision is a significant opportunity for new thinking.

We also note the terms of reference (ToR) for the Central Design Group, especially section 3 on inputs. It will be essential, in our view, that environmental and community stakeholders have a strong role in the development of

the Holistic Network Design (HND) and inform the innovative approach to strategic planning and environmental net gain that will be required to improve social consent for new infrastructure.

9. Do you agree with the planned work for a detailed network design offshore?

Broadly yes.

10. Who do you believe is best placed to undertake the detailed design for assets that are in offshore waters?

We do not have a strongly determinative answer to this question but believe that offshore and onshore design should be closely co-ordinated and integrated which suggests a leading role for the Electricity System Operator (ESO) and/or the Crown Estate in ensuring co-ordination and delivery. We are clear that there should be an integrated environmental assessment methodology that informs the Detailed Network Design (DND) as well as HND (see our answer to Question 8, above).

11. Do you agree that the existing developer led model should be retained and applied where the HND indicates a radial solution should be used? Please explain your answer.

N/A

12. Please provide your views on each of the delivery options we have described in this document. In providing your views, please comment on the issues we have raised. Please also give your views on the implementation issues we have raised.

Commensurate with our answer above (Question 8) regarding close integration, we agree with the suggested model in Table 4 in relation to the ESO solely dealing with HND. After that we are less determinative as to the delivery model, as long as the most integrated approach is being taken. As we have signalled already, our principal concern is the earliest consideration of environmental and community factors in the design (holistic and detailed), planning and consenting stages.

Whilst we are not in full agreement with the analysis (see the Quod report commissioned by NG) and proposals made by NG-ET on the future revision of the Energy NPS suite, we wish to see an innovative approach to strategic planning of infrastructure (new connection) roll out. Integrative approaches, with strong offshore/onshore co-ordination, would be a central plank in this, so the two approaches (HND/DND and the planning framework, via NPSs and the NSIP process) must be closely 'in step'.

Our view is that, although the design of this may be challenging and initially time-consuming, especially in relation to front-loading appropriate environmental assessment (including environmental net gain approaches), it will be necessary to both gain social consent (which the current process does not) and deliver carbon net zero at speed.

13. Please describe any feasible delivery options that we have not set out in this document.

N/A

Multi-Purpose Interconnectors

No answers.

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