



# **SAVE OUR SANDLINGS**

## **Electricity Transmission Network Planning Review**

response from

## **Save Our Sandlings**

We welcome the opportunity to participate in this consultation and we support the general aims of moving from a project-by-project system to an integrated regime based on a longer term holistic plan. However, we are concerned about the conception and implementation of the next stages – as described in this consultation paper – and have answered the questions accordingly.

**Question 1: What are your views on our key objectives for future ET network planning arrangements that can deliver Net Zero at lowest cost to consumers?**

The CSNP model as described appears to be based entirely on cost reduction and the phrase “at lowest cost to consumers” stands out.

Ofgem have established on many occasions, ‘cost’ is not the same as ‘best value’, nor does it often relate to good economics. As stated in 4.20, “the economic assessment should include a cost benefit assessment methodology that strikes an appropriate balance between cost and environment and community impact.” But in the ‘Stage’ model of the CSNP, community and environment are not mentioned until Stage 7. Therefore, the remainder of 4.20 – “reduce the chances of material changes to option design or delivery timing” would create a fait accompli that would satisfy only the developer. At present the planning system is a long way from producing “appropriate, consistent and reproducible methodologies” for quantitative assessment of community and environmental impacts. Social capital remains a formative science and there is little progress in the practical application of natural capital theory.

On the other hand, we wish to encourage the objective of cutting costs through integration. Maximum benefit is achieved by early integration and we believe it is worth exploring financial incentives for companies prepared to adapt current plans so that more holistic longer term integration is achieved.

**Question 2: Are there any other key workstreams that interact with this review that we need to align with?**

We believe it is essential that all OTNR and Ofgem planning review workstreams are aligned.

With regard to planning consenting (2.61), it should not be assumed that NSIP reform will lead to quicker consenting or that speed equates with improvement. The best way to ensure rapid delivery is to engage fully with interested parties at all stages of CSNP planning and delivery. In planning terms, CSNP increases the potential for ‘avoidance’ and need cases will have to be robust to avoid challenge. Where multiple projects are organized holistically and planning applications are made on this basis, mitigation could potentially entail structural changes in the delivery of what are currently entire projects.

**Question 3: Do you have any views on the scope of the review? Are there any key topics that we have missed?**

The scope of the review is primarily focused on cost, technical solutions and regulation. We believe it is in danger of forgetting the cost of socio-economic and environmental impacts and the way in which these will be concentrated on specific areas and communities, especially in East Anglia.

**Question 4: Do you have any views on the success criteria? Are there any key areas that we have missed?**

We believe success criteria should include one of the prime motivators for offshore innovation, namely the minimization of onshore infrastructure with its commensurate impacts on local communities, landscape and environment.

We note that the Strategic Advisory Group (SAG), which is tasked with reviewing key policy objectives, comprises developers and other bodies with little interest outside commerce and technology. While we are not accusing Ofgem of a '1984' mentality, it is regrettable that engagement with community interests that characterized similar working groups 10 years ago has been abandoned.

**Question 5: What are your views on our enduring vision for Centralised Strategic Network Planning?**

The enduring vision for CSNP is based purely on economic, technical and regulatory issues. Pursuing this approach will lead to community resistance and will increase planning risk. In a worst case scenario it will lead to loss of public confidence and poor outcomes.

**Question 6: Do you have any views on the proposed central network planner's role, who that planner might be, and how it may perform this function?**

We do not believe the ESO has the remit or resources to complete the wide ranging task required of the FSO. We hope that the ESO has the vision to propose its own transformation but that requires further consultation.

**Question 7: What are your views on the proposed stages and focus of the enduring CSNP model? If you can suggest alternative approaches to any of the stages then please do so.**

While identifying system needs is obviously an initial requirement, this consultation appears to be based entirely around existing processes and technology. In Table 1, environmental and community impact assessment does not appear until the final stage – stage 7. In this model it is carried out by the delivery body. Based on this table the CSNP process appears to offer few benefits over the existing system.

**Question 8: What are your views on closer stakeholder co-working to break longer-term uncertainty deadlocks?**

Closer stakeholder co-working seems a self-evident requirement to facilitate the changes required. From our perspective we believe it should be transparent with thorough engagement at the earliest opportunities. We understand the necessity of commercial confidentiality but believe this is often provided as an excuse for limiting engagement with the wider community.

**Question 9: What are your views on allocating risks and accountability for various aspects of the CSNP, and for delivering the options finalised under CSNP? Do you have any suggestions to mitigate any of the risks?**

There is a danger in encouraging expedient transitional arrangements which may have a negative impact on the development of more advanced longer term plans. A better understanding of the 'bigger picture' and a more aspirational vision is required at the earliest opportunity. Otherwise there is a real danger the CSNP process could limit the success of the subsequent Holistic Network Design (HND).

**Question 10: What are your views on the proposed Transitional arrangements?**

As we have been unable to meet with BEIS and ESO as part of our agreed engagement process, we are at a disadvantage and lack a clear understanding of the progress achieved by the ESO. We cannot comment further without the clarity that Ofgem also appears to require and for the present we concur with the sentiments of para 4.42.

**Question 11: Do you have any views on the next steps to implement CSNP?**

We hope that the next steps will take account of the comments and suggestions made in this submission.

**Question 12: What are your thoughts on our initial view of the areas to be covered in the next phase of the review? Are there other areas that aren't included that you would like us to include?**

The ETNPR appears to provide little opportunity for community engagement and especially at the earlier stages of CSNP. In this context the proposals in this consultation appear to be less well balanced than in the Ofgem OTNR consultation, published 14 July 2021. Policy Assessment Criteria in Appendix C of that consultation and Network Design Objectives (Table 3, p46) appear to give equal weight to “local communities impact”, “environmental impact”, “deliverability and operability” and “economic and efficient costs”. We trust this weighting will be maintained throughout Ofgem’s processes.