



Mr K Anand
Ofgem – Electricity Transmission
10 South Colonnade
Canary Wharf
London
E14 4PU

Konark.Anand@ofgem.gov.uk

Enquiries to: Phil Watson – SCC Strategic
Energy Projects Manager / Naomi Goold –
ESC Principal Energy Projects Officer

Email: Phil.watson@suffolk.gov.uk
Naomi.Goold@eastssuffolk.gov.uk

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Dear Mr Anand,

Consultation on the initial findings of our Electricity Transmission Network Planning Review

Suffolk County Council and East Suffolk Council, (the Councils) welcome the opportunity to comment on the proposed development of a Centralised Strategic Network Plan (CSNP), for onshore transmission in Great Britain, that is offered by this consultation. The principal concerns of the Councils are set out in detail in the appendix to this letter, and are also summarised as follows:

- Developing and maintaining public confidence

It is essential that the development and operation of the Centralised CSNP, is designed, implemented, and communicated, such that it can bolster public confidence and not undermine it. This is vital because public confidence is essential to both the delivery of new transmission infrastructure, and the wider Net Zero transition. (See question 4)

- Consultation with Local Authorities and Communities on a CSNP

The consultation document sets out highly preliminary proposals for consultation with Local Authorities and Communities on a CSNP. This matter requires significantly greater development and the processes and approaches for consultation should be a specific workstream, along with environmental assessment and the relationship between the plan and the consenting regime. (See question 3)

- Assessment of environmental and social impacts

The processes by which the impacts of the plan are assessed, that is the Appraisal of Sustainability and a plan level Habitats Regulation Assessment, must be robust (see question 5 & question 1). The Councils consider this is essential to secure and maintain public confidence, and to provide the necessary foundation for any proposed assumptions regarding

the need for new network infrastructure, that may inform the consenting process, through the Planning Act 2008, and specifically, as set out in draft NPS EN-5. (See question 5)

- The balance between costs to the consumer and social and environmental costs

It is not clear at this stage where the regulator may be prepared to strike the balance between headline cost and environmental and community impacts, in particular; which social and environmental costs will, or will not, be considered legitimate to be brought onto the balance sheet to be borne by the consumer? What processes and evidence will be required to support the appropriate balance between consumer cost and adverse community and environmental impacts? (See question 5)

- The relationship with the consenting regime

The development of CSNP will interact significantly with the changing project consenting regime, as it has the potential to support the presumption of the need for new network infrastructure proposed in draft EN-5. Furthermore, it may well contribute to the objectives of the Nationally Significant Infrastructure Project (NSIP) Reform Programme, (see question 1 and 2)

- Transitional arrangements

Together with the Holistic Network Design (HND), the Network Options Assessment (NOA - 7), due for publication in 2022, can give clarity and certainty to the public, and all interested parties, about the future network development programme, both on and offshore. Therefore, it may be appropriate to delay publication of NOA-7, to ensure it can respond effectively to the findings of the HND and provide the clarity and certainty, which is so urgently needed. (See question 10)

It is hoped that these comments will help to support the updating and reforming of Transmission Network Planning in Great Britain, to ensure that the UK's Nationally Determined Contribution (NDC) to the Paris Agreement, can be delivered whilst simultaneously maintaining, and enhancing, public confidence.

Yours sincerely,



Richard Rout
Cabinet Member for Environment and
Deputy Leader of Suffolk County Council



Craig Rivett
Cabinet Member for Economic Development and
Deputy Leader of East Suffolk Council

Appendix - Consultation on the initial findings of our Electricity Transmission Network Planning Review

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 Councils support the objectives set out at 2.30.6 that:

The arrangements should provide clearer information, at an earlier stage, to planning authorities and local communities on the interrelationship between ET network projects, and how environmental and community factors have been taken into account in design of the network. The arrangements should also enable early engagement by local authorities, other stakeholders, and local communities to the process and to the need for and design of ET networks. This will help inform the work on the balance between cost, timing and community and environmental impact. It will also help support delivery of projects through planning and consenting processes.

However, both the consultation processes and the processes by which the impacts of the plan are assessed, that is the Appraisal of Sustainability¹ and a plan level Habitats Regulation Assessment, must be robust (see question 5). The Councils consider this is essential to secure and maintain public confidence (see question 4) and to provide the necessary foundation for any proposed assumptions regarding the need for new network infrastructure that may inform the consenting process, through the Planning Act 2008 and specifically, as set out in draft NPS EN-5². It is not clear at present how the right balance between the environment and community, timing and cost will be identified to ensure that the most *appropriate* strategic investments are made. It is understood from Appendix 3, that analysis and decision-making methods could be considered in the next phase of the ET Network Planning Review (ETNPR), it is important that the means to undertake this balancing exercise is fully considered and explored as part of this work.

The objective set out in para 2.30.5 is also considered important to ensure that innovation via private initiatives is not suppressed.

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

Planning, consenting and priorities in the terrestrial space

The development of the CSNP will interact significantly with the changing project consenting regime, as it has the potential to support the presumption of the need for new network infrastructure, proposed in draft EN-5. Furthermore, it may well contribute to the objectives of the NSIP Reform Programme, by creating opportunities to speed up the process. However,

¹ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

² Paragraph 2.1.2 Draft EN-5
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1015238/en-5-draft-for-consultation.pdf

it can only achieve these benefits if it is thorough, robust, and has the necessary public confidence.

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

The Councils welcome the strategic clustering of large projects and centralisation of planning as set out at para 3.1 -1.

Clustering relates to grouping together two or more large projects which share a common set of drivers and/or are mutually dependent to derive the full extent of system benefit under the regulatory approval and planning consent processes.

The Councils support the consideration of the clustering of two or more projects for regulatory and planning consents purposes where appropriate. Consideration of multiple interrelated projects at the same time would help to ensure that the cumulative benefits, and dis-benefits, of those projects are identified and assessed.

Also, the breadth of whole system solutions is noted and welcome, as set out at 3) “enable adoption of whole system solutions across regulated networks and beyond, for example by considering the broader energy system”.

However, it is considered that the scope of the review should be expanded, to encompass: *Roles and responsibilities in network planning, including processes of engagement, consultation, and environmental assessment.*

The current arrangements for the Network Options Assessment (NOA) tend to lack transparency at best, or in the case of the Connections Infrastructure Options Note (CION) process, tend to undermine public confidence. Historically, the System Operator has not been required to carry out the type of environmental assessment, processes, and engagement, associated with Strategic Spatial Plans. Therefore, it would be appropriate for the scope of the review to include this as a key topic.

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

The success criteria set out on Table 3 in Appendix 1 appear to be satisfactory. However, it would be appropriate to consider a further criterion such as:

E2 How likely to bolster public confidence, such that it can support and not undermine the delivery of transmission infrastructure, essential for the Net Zero Transition.

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

Appropriate balance between cost and environmental and community impact

The Councils agree that the scope of the enduring CSNP should cover all load-related Electricity Transmission (ET) network investment in GB, including onshore, offshore and interconnectors, subject to the findings of the Interconnector Policy Review (IPCR).

However, the Councils look forward to further clarity regarding the following aspect of the enduring vision, specifically:

4.20. We consider that the economic assessment should include a cost benefit assessment methodology that strikes an appropriate balance between cost and environmental and community impact. This should reduce the chances of material changes to option design or delivery timing at later stages due to adverse stakeholder engagement and/or major issues with planning consents. For the community and environmental impact assessment, qualitative assessment should be supplemented where possible, with robust mechanisms to quantitatively assess impact. Any quantitative measures should be based on appropriate, consistent, and reproducible methodologies.

This appears to move away from the current, lowest cost to the consumer, model, and if that is the case this would be very welcome. However, it is not clear if the proposals at para 4.20 are drawing a clear distinction between:

- i) Costs associated with the mitigation of adverse environmental and community impacts that are required to make a project acceptable for consent.
- ii) Costs of community & environmental benefit schemes that are not necessary for mitigation or compensation of adverse effects, and therefore outside the planning balance.

The former is for the Secretary of State to consider, or otherwise, as legitimate costs necessary to make a project acceptable in planning terms, and not therefore a matter for the regulator to revisit in detail, or to re-test evidence that has already been tested by the Secretary of State.

Furthermore, it is not clear at this stage where the regulator may be prepared to strike the balance between headline cost and environmental and community impacts, or critically:

- iii) Precisely which social and environmental costs will, or will not, be considered legitimate to be brought onto the balance sheet such that they can, subject to “robust qualitative and quantitative assessment”, be legitimately borne by the consumer?
- iv) The processes and evidence required for that balance, between cost verses communities and the environment, to be struck.

The scope of new network environmental impacts

4.21. For the purposes of CSNP, our initial view is that environmental impacts would include the impact of new network on the local natural environment like water bodies, Sites of Special Scientific Interest (SSSIs), Areas of Outstanding Natural Beauty (AONBs), animal and plant habitats; and impacts on the wider the environment like through the use of SF6 in new networks, or through network losses.

The Councils consider that this scope should be expanded and clarified, notwithstanding the additional information in Appendix 2, at “stage 4 cost benefit analysis”; to include the following:

- National Parks & the Broads; National Scenic Areas in Scotland
- Heritage Coast, where it does not fall within an AONB or National Park
- The hierarchy of international, national, and locally designated sites of importance for biodiversity
- Potential Special Protection Areas and possible Special Areas of Conservation; listed or proposed Ramsar sites.
- Sites identified, or required, as compensatory measures for adverse effects on habitats sites
- Protected species
- Priority Species³ and habitats⁴
- Areas identified by national and local partnerships for habitat management, enhancement, restoration, or creation
- Scheduled Ancient Monuments⁵
- Registered Parks and Gardens⁶
- World Heritage Sites

It is considered that the plan will require Habitats Regulations Assessment screening.⁷ However, for the purposes of making this plan, it is not clear who the “Competent Authority” will be in this instance, but it appears likely to be the Central Network Planner that is, the Future System Operator (FSO).

The scope of new network community and social Impacts

4.22. For the purposes of CSNP, our initial view is that community and social impact would relate to the impact of new network on communities during the construction stage e.g. road closures, and the lasting impact of the network once it is built e.g. visual impact of electricity towers or substations.

And it is noted in appendix 2 of the consultation pp71-72, the following are identified to be assessed:

³ <https://jncc.gov.uk/our-work/uk-bap-priority-species/>

⁴ <https://jncc.gov.uk/our-work/uk-bap-priority-habitats/>

⁵ <https://historicengland.org.uk/listing/what-is-designation/scheduled-monuments/>

⁶ <https://historicengland.org.uk/listing/what-is-designation/registered-parks-and-gardens/>

⁷ <https://www.gov.uk/guidance/appropriate-assessment>

- *Considering the visual impact of electricity networks.*
- *Proximity of above ground assets to residential area (socio-economic impacts) and built environment impacts (including heritage/listed building impacts).*
- *Considering community and social impacts of work on protected or sensitive areas.*
- *Considering noise and traffic impact during construction.*
- *Additional socio-economic impacts, especially during construction phase.*

Although noise has been included as a consideration during construction, it has not specifically been identified in relation to the operational phase. It should be part of consideration of the ‘*proximity to above ground assets to residential area*’.

Finally, the resilience to the strategic highway network to support effective links to key infrastructure should be considered when plan making. Specifically, access to proposed or existing key infrastructure, that is, substations, during both construction and operation and port facilities, in particular in respect of abnormal indivisible load (AIL) routes.

The review of community and social Impacts should also seek to establish baseline data regarding the character, sensitivity, and resilience of the communities likely to be impacted by the plan. Based on data available from the UK Data Service⁸ and other sources, including but not limited to:

- Demographic characteristics
- Socio-economic characteristics
- The likely contribution of other plans or programmes of infrastructure development to community and social impacts.

The Councils consider that the development of the CSNP should be cognisant that rural communities and economies, have specific characteristics and vulnerabilities; for example,⁹ Tourism-related businesses are important.

- 70,000 tourism-related businesses, employing 0.6 million people.
- 14% of employment (11% in urban areas)
- In the more sparsely populated areas tourism becomes more important, providing 22% of employment.

Rural economies are as diverse as urban economies.

- 85% of rural businesses are unrelated to agriculture, forestry, or fishing.
- Education, health, and social work provide 17% of employment.

⁸ <https://ukdataservice.ac.uk/>

⁹ <https://www.gov.uk/government/statistics/quarterly-rural-economic-bulletin/rural-economic-bulletin-for-england-june-2021>

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?

Central Network planning should be performed by the FSO¹⁰. We agree with paragraph 4.28, that apart from perhaps on a temporary basis, CSNP should be carried out by the FSO and not the Electricity System Operator.

It is noted within the consultation in para 4.28 that the central network planner's role, and therefore FSO, will require a specific skill set to ensure the CSNP is effectively delivered. However, it is not clear how this will be secured in the time available. It is noted therefore that this is identified as a risk within Table 2.

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.

Reviewing Table 1 p48, it is not clear at what stages, or between what stages, there will be consultation with Local Authorities or communities as set out at para 2.30.6. However, appendix 2 indicates that there will be engagement when investment options are being identified.

The central network planner should 'own' this stage but would be expected to engage with TOs to get any information on their assets or sites to be able to make informed solutions. The central network planner should also engage with other relevant stakeholders to seek their inputs as necessary. The central network planner should also consider using the services of specialists in planning consents and project delivery to ensure that viability of solutions to get planning consents is considered at an appropriate level at the early stages of network planning, and the impact of any solution on local communities and the environment is also considered to avoid deliverability issues later on.

The Councils agree that this is, subject to effective implementation, likely to minimise deliverability issues, although elimination of such issues is unlikely.

It is not clear from Table 1 how long the CSNP process would take in its entirety from plan making to adoption and the potential length of the different phases within the process. It is important for all stakeholders to understand from the outset their ability to engage with the CSNP process. The flexibility in the timing of any review is supported to prevent the process becoming too mechanical and unable to respond flexibly to changing circumstances, it would however be beneficial to have a maximum period within which a review should have been commenced or undertaken.

It is unclear at present how the CSNP and the Offshore Transmission Network Review HND will interact and how the approval mechanisms will relate to one another, especially as there is potential for duplication between the plans. If the HND is on a 5-year approval cycle for

¹⁰ <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/major-infrastructure-projects/SCC-ESC-Response-to-FSO-Consultation-Redacted.pdf>

example and the CSNP is updated more frequently there is a potential for the documents to conflict with one another, how would this be managed?

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

As suggested in the consultation closer stakeholder co-working to break uncertainty may be effective in reducing deadlocks.

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?

No comments on this matter

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

To maintain timely delivery of projects that are required to connect by 2030, the output of the Holistic Network Design (HND) and NOA 7, will need to be the transitional output of the CSNP. Therefore, the nature, scope, and timing of NOA 7 will need to be modified, to ensure it can fulfil this role.

The Councils consider it would be appropriate to delay the publication of NOA 7 if needed. This should ensure that together with the HND, it can give clarity and certainty to the public, and all interested parties, about the future network development programme, both on and offshore.

It is not clear from the consultation material to what extent the environmental and community impacts will be considered as part of the decision making during the transitional phase. Paras 4.40 and 4.40.3 state that the transitional ET network arrangements include an assessment of options for addressing system needs based on a cost benefit analysis which includes the requirement to balance cost and environmental and community impact. The language utilised is an assessment of options rather than a commitment to include these impacts as part of any decision making. This requires further clarification.

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

It is agreed that transitional arrangements should be put in place in 2022 for the reasons set out in answer to question 10.

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?

There are no further comments, in addition to those additions and modifications proposed in earlier answers.