

## **SEAS response to the Ofgem OTNR consultation, July/August 2022**

### **Consultation on our minded-to decision and draft impact assessment on the initial findings of the Electricity Transmission Network Planning Review**

**For the attention of Neil Copeland**  
**[RIIOElectricityTransmission@ofgem.gov.uk](mailto:RIIOElectricityTransmission@ofgem.gov.uk)**

**18 August 2022**

Suffolk Energy Action Solutions (SEAS) founded in July 2019 has since been promoting the replacement of outdated plans for radial onshore infrastructure with new offshore integrated solutions establishing offshore hubs and utilising onshore brownfield sites within the next three years across the Nation as part of a bigger spatial plan.

SEAS responded to the ETNPR initial findings on 17 December – see appendix below – contents of which we still stand by.

SEAS welcome the opportunity to comment further and are particularly supportive of parts of the minded-to decisions which address environmental and community impacts, and the need for transparency of process. The following paragraphs refer:

#### ***Considering the environmental and community impacts of new infrastructure***

**2.42. New infrastructure** ..... need to take account of community and environmental constraints ..... when developing proposals, if they do not, proposed developments will not receive consent.

**2.43. Developing a new process for network planning** that includes consideration of environmental and community impacts will facilitate demonstrable, transparent consideration of environmental and community impacts by network licensees at an earlier stage than occurs today. ....

*2.44. **When developing new network-wide planning methodologies, ..... due regard to the appropriate planning and consenting processes when undertaking the earliest stages of spatial network planning.***

*2.45. Whilst the output of a **new planning process may give visibility of the cumulative impact**, this may not be enough to secure the support of impacted communities. .... transparency at earlier stages in the planning process, such as when estimating future load.*

***Transparency in all stages of the network planning process***

*2.46. .... **Ensuring transparency means** that the justification for infrastructure should be more easily defended than if stakeholders do not know why one solution is preferred over another.*

SEAS expect that the framework outlined in respect of communities, the environment, and transparency, will be carried through to the next stage of the process, and fully and robustly incorporated into detailed proposals for Transmission Network Planning.

Whilst welcoming the above minded-to-decisions, SEAS are however gravely disappointed that after making the case for the EA1N/EA2 Friston/Leiston designated projects to become 'Pathfinder Projects' they have been completely overlooked. SEAS urge you to redesignate them as 'Early Opportunity' so they may become the first projects to pave the way in creating a 'North Sea Corridor' for subsea cabling directly from windfarm to offshore platforms to brownfield sites closer to where the power is needed. Five Estuaries, North Falls, Nautilus, Eurostar and Sealink could fast follow on thereby speeding up the process in achieving Government's 2030 goals.

Fiona Gilmore

Founder

SEAS (Suffolk Energy Action Solutions)

[info@suffolkenergyactionsolutions.co.uk](mailto:info@suffolkenergyactionsolutions.co.uk)

[www.suffolkenergyactionsolutions.co.uk](http://www.suffolkenergyactionsolutions.co.uk)

## **APPENDIX**

# **SEAS response to the Ofgem Consultation on the initial findings of the Electricity Transmission Network Planning Review**

By Email: [Konark.Anand@ofgem.gov.uk](mailto:Konark.Anand@ofgem.gov.uk)

17 December 2021

Suffolk Energy Action Solutions (SEAS) welcomes the opportunity to comment on the proposed development of a Centralised Strategic Network Plan (CSNP), for onshore transmission in Great Britain.

SEAS was founded in July 2019, and its mission is to help promote the replacement of outdated plans for onshore infrastructure with new more co-ordinated systems using brownfield sites as a set of Hubs established within the next three years across the Nation as part of a bigger spatial plan.

### **EXECUTIVE SUMMARY**

We endorse the overall objective to step change from a fragmented point-to-point radial connection and individual project system to a co-ordinated integrated regime based on a spatial strategy and a longer-term holistic plan. This step change is long overdue and it should be introduced for ALL projects not yet recommended for consent by the PINS Examiners. A project is only “in flight” if it has been recommended for consent by the PINS Examiners. Given the outdated way of selecting sites using linear “Cost” criteria, as the woefully inadequate basis for site location assessments (CION and RAG) we believe that the new CSNP can be set out during 2022 and that onshore design and site selection should be postponed until this new holistic plan is approved. “Split Decisions” enable the offshore construction to go ahead with the reassurance that by the end of 2023, the onshore Hubs will be selected and infrastructure planning can flow from those site selection agreements.

A paradigm shift in conceptual planning should be part of the new framework for any future project, namely, to carry out comparative assessments using a new set of criteria where the environment, the community and the economy are considered as the priority criteria and that existing onshore brownfield sites are established at the outset as the future Hub locations close to the shoreline. The criteria for any future projects should upweight the Brownfield location site as against other unspoilt countryside sites in order that there is a more accurate assessment of green energy optimised versus the current dirty green energy infrastructure.

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

This is the wrong first question. The question should be:

“How can we together devise an ET network plan that delivers Net Zero with the minimum adverse impacts to Environment, Communities and local Economies? “

Your question originates from the old school approach which is no longer fit for purpose because it fails to acknowledge the real issues relating to energy infrastructure and its impacts. If the first question is concerned with cost, it is not surprising that you go down the wrong path from the outset, choose the wrong plans and the wrong locations.

Unless the community and local councils are engaged from the initial stage in preliminary exploration of Hub locations, the risk is that common sense views are missed and that desk research assessments are the major influence over site locations. Given the need for fewer site locations but that they are larger strategic sites and used for multiple substations and connectors, it has to make sense for those preliminary explorations to include environmental surveys carried out at the correct time of year.

Your stage-by-stage process fails to understand the invaluable contribution from local community groups whose local knowledge can inform the investigation and fast track the learning curve. Our suggestion is to make the best use of the local community and Council and trust these people to be constructive information providers.

By excluding them from the engagement until your defined Stage 7 is evidence that your whole approach has not changed and that your process is outdated and flawed.

We agree that quantitative assessments by totally independent assessors, of community and environmental impacts should be established, using new methodologies applying weightings to criteria such as: light pollution, noise pollution, other pollution, water contamination, landscape, heritage, amenity disruption, road congestion, road danger, mental health, well-being, local economic forecasts, and in parallel, proper audits of Priority Species, Environmental Net Gain reports, and rare land depletion forecasts, have to be discussed at the outset and commissioned for site locations, always including brownfield sites. These methodologies need to be advanced by a specialist independent team and should be transparent.

As we have stated during the course of the ScottishPower EA1N and EA2 Examinations, biased surveys have misled the Examiners and lead to the wrong conclusions. A visit to the possible sites with local community and Council members in attendance, will give at the very outset a robust indication of the relevance and suitability of that site. One day on the Timetable and a gross negative check is achieved.

Cost efficiencies can be gained in a number of ways. Comparative studies of the German, Dutch, Belgian and Danish systems show the benefits of an independent ESO working closely with the Community and Councils to choose the best sites for all parties concerned. Cost efficiencies are easier to guarantee once a Hub is selected with minimum cable route length. Fewer studies then need to be commissioned for subsequent projects because the Hub site has already been chosen. 1+1 =3. Fewer Judicial Reviews and fewer challenges to the Applications because the buy-in took place at the outset. Developers are more reassured because there is less uncertainty about the project's viability.

The OTNR has talked about Anticipatory Investment schemes to attract developers to halt their outdated schemes and switch to new integrated systems. This AI scheme should be introduced without any further delay in order to advance this new world.

**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. All NSIP projects planned for the region have to be included in the consideration, and future NSIP projects could be accelerated and importantly, be greener by virtue of the initial holistic planning and filtering. Public confidence and buy-in can be best achieved by ensuring that Community groups are engaged at the outset, and through the stage by stage process.

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

We welcome the strategic clustering of projects where a common set of drivers are shared, but these need to be given equal attention and interrogation, not hidden from scrutiny by being slipped into each other. In this way, proper assessment of the cumulative impacts can be considered including adverse impacts.

We endorse the Suffolk County Council view 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”. We would add that the socio-economic benefits or dis-benefits should be included in this review.

It cannot be right for the developer to present the case but that an independent audit is presented which takes into account primary research using quantitative studies. A developer is biased before he starts.

The current system for assessment, the Network options Assessment (NOA), lacks transparency and in the case of the Connections Infrastructure Options Note (CION) this process has been totally devalued by biased reports and flawed methodologies.

In light of the new Spatial Strategy proposed approach, these assessments will have to be much more robust and transparent in order to be credible to the various stakeholder groups.

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

We endorse the suggestion made by the East Anglian Alliance of Amenity Groups that onshore infrastructure should be minimised and located wherever possible in a Hub cluster close to the shoreline; this is a primary criterion.

The membership of the Strategic Advisory Group (SAG) tasked with reviewing key policy objectives consist of commercial and technology stakeholders. This is old school thinking, inherently biased, and not inclusive. It would make more sense to involve strategic advisers with relevant up-to-date experience advising on socio-economic and environmental criteria.

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

The cost-benefit analysis mentioned in 4.20 is contentious because it is currently worded ambiguously.

The balance between costs and impacts has to be re-evaluated and a new balance sheet method agreed whereby the forecasts are quantitatively measured by independent, objective research specialists, not by the developer.

Mitigation costs are currently judged to be risible by local Communities; a case in point is £150,000 for some additional marketing materials for the Aldeburgh Tourism region in the event of ScottishPower being given the consent required for EA1N and EA2. The long lasting damage to a Tourism sector based on Nature and tranquillity has not been fully understood even by the local East Suffolk District Council. We give this example to show how removed the planning system is from the harsh reality of these projects and how local councils should not be given the power to make these agreements without consultation with the local Community. We believe that unless the local Community is involved at every stage, these nonsense mitigation agreements will continue to proliferate.

We endorse the Suffolk County Council (SCC) concerns that the current definition of environmental impacts is not sufficiently wide-ranging to encompass **priceless** landscapes, habitats and monuments.

Without these specifics as listed by SCC one could allow the largest energy hub in the UK to be built adjacent to a medieval Church or multiple cable routes trash a wet woodland where four Priority Species are safely making their habitats, and where rare lowland heathland would be destroyed permanently.

The Future System Operator (FSO) would be the Central Network planner and that this new objective body would be responsible for making these assessments, no longer the developer who is motivated not to notice the wet woodland or the Priority Species.

Let us be clear. The current system is set up to fail to protect all those precious, priceless assets which have no voice.

Regarding the social and economic impacts, SEAS has been gravely concerned throughout the last two years of the Application process for SPR EA1N and EA2 that a developer is motivated not to notice the importance of Tourism to a particular region nor the Community impacts of a permanent operating Hub situated cheek by jowl with a thriving deeply rural village community.

Tourism is the most important sector for Suffolk Coast and Heaths and no amount of temporary workers will compensate for high value Tourism nurtured over decades in Aldeburgh and the surrounding villages, less than five miles from a proposed Hub.

New methodologies should be selected carefully by the FSO in order to investigate the sensitivities and robustness of a Community to withstand the trauma of a proposed Hub in terms of cumulative impact.

**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?**

It is crystal clear that only an independent FSO can take on the Central Network Planner's role and that the skill set to ensure the effectiveness of this planning would imply a new team set up with relevant specialists in each sector - environmental, economic and social as well as the historic commercial arm.

**Question 7: What are your views on the proposed Stages and Focus of the enduring CSNP model?**

SEAS is dismayed to see that the "Stage by Stage" process is very little changed from the old school. We expect to see a radical overhaul to address the crucial flaws in the current system. We would expect a new team to draw up this process, not the old team. It is worrying to see that Community and Environmental impacts are not assessed until Stage 7, by which time it is too late to look widely at the options, the filtering has already taken place.

As we have stated at the outset, the Community must be part of the Team from the outset. Without this, basic errors can be made due to lack of knowledge of the local area.

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

Currently, there appears to be reticence at engaging with local Communities. This cultural barrier needs to be addressed. The notion that a developer knows best is a myth and has been fully exploded in recent years as a result of the current NSIP process.

Co-working, co-assessing, co-protecting, co-solving - the more collaboration between all stakeholder groups, the better. Commercially sensitive information is often used as the reason for non-disclosure. We need to change this culture and understand that we are all working for the common good. The FSO can be responsible for changing the culture entirely.

**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?**



The mood music suggests that in the short-term interests of increased wind energy generation, the least bad of two evils is acceptable if speed is ensured.

We challenge this irresponsible and callous approach. In the transitional period, it is essential that planning decisions relating to the Spatial Strategy are factored in and that new opportunities to co-ordinate are actively explored and taken seriously. The developers need to be reassured that their risk is minimised if they take on these Early Opportunity Pathfinder projects. The Anticipatory Investment scheme should allay their fears. Community fears are far more concerning. Derisory offers of mitigation are unacceptable for that which is unmitigable. The Policy Exchange paper published on this subject earlier in 2021 shows how policy makers are remote from the harsh realities of affected Communities and how they are working too closely with the developers and National Grid, having failed to conduct any meaningful research in those most affected areas with local Communities.

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

If necessary, the publication of the Holistic Network Design should be delayed in order to ensure that it has taken into account the opportunities to make better decisions for all parties concerned during this Transitional phase.

The NOA7 would also be delayed accordingly.

We believe that already during this step change period the broader concerns should be addressed. We cannot as a Nation continue to make these horrendous decisions in the so-called name of Green energy goals.

There are better solutions available now. The Technology is available and there are problem solvers available who have proven experience. National Grid Ventures and their new MPIs are not the exclusive supplier of integrated solutions. Britain should be more open to new suppliers and proven implementation programs. BEIS should work with the new FSO to facilitate this Transition and to bring in new suppliers who offer smarter, greener solutions. Conflict of interest must be apparent to all parties concerned. There is no longer any excuse for National Grid to be the Architect and the Builder. In this Transitional period, the credibility of the new teams is at stake. It would be wise to establish a specialist team who have no conflicts of interest.

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

SEAS believes that it is crucial to take the time to ensure that the bigger picture is taken into account and independent advisers with no conflicts of interest are appointed.

**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?**

SEAS is disappointed that the ETNPR appears to be remote from the Community and the nature of these questions leads us to believe that this is not the radical overhaul required to ensure that our countryside is protected from needless damage in the long-term.

Fiona Gilmore

Founder

SEAS (Suffolk Energy Action Solutions)

[info@suffolkenergyactionsolutions.co.uk](mailto:info@suffolkenergyactionsolutions.co.uk)

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