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Consultation on Ofgem's minded-to decision and draft impact assessment on the initial findings of the Electricity Transmission Network Planning Review

The Suffolk Preservation Society is a civic society based in East Anglia whose charitable objects are to protect and promote the special qualities of Suffolk. We represent the Campaign for the Protection of Rural England in Suffolk and we are a membership-based organisation that includes: private individuals, amenity societies, organisations and parish councils. A primary focus of the charity's work is to support communities that are affected by energy projects that impact upon our valued historic natural and built environment. We work closely with other single issue campaign groups in the county who are also responding to energy projects that are directly impacting their communities, and we support each other on areas of mutual concern.

We would like to respond to Question 3 of this consultation: **Do you agree with the impacts of introducing the CSNP that we have identified? Do you think there are other impacts not currently addressed**

We strongly support the urgent need for a new planning process (CSNP) led by the Future Systems Operator, to co-ordinate a network that maximises the opportunities to mitigate harm to landscapes and affected communities. In particular, we welcome the references to community impacts of new infrastructure and the emphasis placed upon the need to recognise the valid concerns of affected communities if consent for projects is to be forthcoming. The need to minimise environmental and landscape impacts while maximising mitigation and compensation, where appropriate, for affected landscapes and communities should be robustly defended in this new process.

The development of new processes to ensure timely and appropriate consideration of community impacts is overdue. For too long affected communities and local stakeholders' views have not been given due weight in the planning process. The existing NOA arrangement is considered to give insufficient weight to environmental and amenity considerations, thereby prematurely narrowing of preferred options. This is particularly relevant to issues around cumulative impacts of multiple projects and the need for co-ordination which, in the case of Suffolk, has resulted in significant levels of avoidable harm to the environment and the wellbeing of communities.

We also fully support the references to the need for improved transparency. Recent consultation by National Grid on the East Anglia Green (180km pylon line from Norwich to Tilbury) clearly illustrates the need for open and honest disclosure by developers about their proposed projects together with reasonable alternatives.

If the new system is to be truly effective, faster and greener, it must provide for meaningful consultation with affected communities, as well as other local stakeholders. It must also ensure that their views are positively responded to, at the earliest possible stages of the planning process. Only in this way will the community support be forthcoming which is essential for the efficient delivery of the government's Net Zero ambitions.

However, we have two principal concerns:

1. The consultation gives no comfort for those communities in our county which are faced with projects that are already in flight. The existing system is clearly not fit for purpose and until the CSNP is instituted, communities will continue to suffer from a system that inherently disadvantages them.
2. It is not clear how the CSNP, a centralising strategic planning tool, can be satisfactorily reconciled with the anticipated revised NPS's which are likely to give even greater weight to speeding up delivery of a decarbonised grid. It has the potential to form part of a draconian framework that will further diminish the views of affected communities.

We sincerely hope that the CSNP, as part of the FSO's role, will give greater recognition of the views and priorities of local stakeholders and bring about increased transparency when engaging with communities.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Fiona Cairns', with a stylized flourish at the end.

Fiona Cairns IHBC MRTPI
Director