

By email to: RIIOElectricityTransmission@ofgem.gov.uk

18 August 2022

Konark Anand & Dayna Roger
Network Planning Review Team
Ofgem, 10 South Colonnade
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Dear NPR Team

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

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.

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 greenhouse gas emissions. 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.

The electricity transmission system, and its planning, can have significant impacts on valued landscapes, communities and biodiversity. Whilst we welcome current initiatives (e.g. the recently announced Pathway to 2030 and the Holistic Network Design) towards a better planned and more integrated national electricity transmission system (NETS), we still believe strategic planning of the network can be further improved, especially in relation to better environmental and community outcomes. This is further explained in our responses to the consultation questions below (references in parentheses are to the consultation document paragraph numbering).

Question 1: Do you have any concerns with our minded-to decision?

We support the creation of the Centralised Strategic Network Plan (CSNP) and its objectives, though would add the need to both minimise environmental and community impacts and maximise environmental and community benefits to the objective to 'maximise efficient utilisation of electricity networks' (2.1). Furthermore (2.16) we are concerned at the overly narrow focus of CSNP 'on delivering the optimum technical solution for the energy system'. This must instead be balanced with environmental and social outcomes.

We are clear that the Future System Operator (FSO), using the CSNP, should allow for innovation (2.31, 2.34) and should favour types of strategic (anticipatory) investment (e.g. enhanced offshore co-ordination) that bring strong benefits for the environment, landscape and communities. We do however have outline concerns regarding FSO advice on location of new generation or demand (2.36); in line with later points we make (see below), such direction would also need an improved

model of overall system planning that takes into account environmental and community impacts at a much earlier stage than currently (mirroring your views at 2.43).

We also see value in widening the definition of strategic investment beyond that necessary to deal with constraint boundaries, though again subject to more comprehensive strategic environmental assessment (SEA) methodologies, as the current Appraisal of Sustainability (AoS process) is not sufficiently robust and hence not fit for purpose.

Please note that 2.42 specifically mentions ‘areas of outstanding natural beauty’ without reference to the wider suite of designated landscapes and sites – especially national parks - that Ofgem is required to have regard to in its activities. This scope must be made clearer in any future decision.

We strongly concur with the requirement to ‘frontload’ consideration of environmental and community impacts at an earlier stage in network planning. We are currently concerned that insufficient weight is placed on environmental and amenity criteria within the Network Options Assessment (NOA), leading to a premature narrowing of options and preferred solutions. The selection process within NOA also lacks transparency and we welcome your minded-to views at 2.46/2.47 as to how the FSO/CSNP process can improve on this.

However, to improve social consent, this requires both transparency and earlier and wider optioneering of possible infrastructure, routes and/or locations through improved impact analyses, such as SEA.

Question 2: Do you agree with how we have estimated the scale of load related investments?

We have a small concern regarding the offshore load related capex (3.17) and believe £0.8M per MW may be an underestimate. We say this as we believe that further offshore integration is required, as the current proposals in Pathway to 2030/HND do not represent a significant enough step-change (away from the radial model) in reducing the number of coastal landings and hence insufficiently mitigating environmental and community impacts. Such integration will likely be more costly (in capex terms) though we would argue that such anticipatory spending will have strong overall cost benefits and help speed delivery.

Question 3: Do you agree with the impacts of introducing the CSNP that we have identified? Do you think there are other impacts not currently addressed?

Continuing with the theme of benefits, we strongly agree with the view (3.21) that there will be significant (financial) value from an improved network planning process and have stated this repeatedly within recent submissions to OTNR and the energy NPS consultation. In summary, our view is that earlier, and more transparent, consideration of environmental and community impacts will improve social licence such that friction and time within the consenting process can be reduced, lowering overall costs and accelerating delivery of much needed low carbon solutions; also, more upfront consideration of environmental and community impacts will do more to prevent damage to the attractiveness of designated landscapes for tourism.

We are also concerned at the implication (3.23) that planning activities could be a ‘zero sum gain’. If anything, more planning resource may be required if strategic planning is to be improved (both with the FSO and the TOs) but again our view is that better, and earlier planning will lead to considerable benefits in social licence and thus reduced consenting costs to the TO, assuming that the policy framework (energy NPSs etc) is revised appropriately.

Question 4: Have we omitted any inputs, activities, outputs, or impacts that should be included?

We note and, in principle, support improvements to FES (especially in terms of more ambitious demand management/reduction) and the introduction of improved cost benefit tools which take full account of environmental and social costs (4.8). However (and see our response to Q1 above), we believe that omitting a robust SEA process at an earlier stage will cause serious problems.

Question 5: Have we included any inputs, activities, outputs, or impacts that should be omitted?

We again wish to register our concern at the addition of CSNP siting advice for a range of energy 'vectors' (4.10). Such advice, and any optioneering, should be within a clear and transparent framework of a strategic planning process that includes robust environmental testing and, overall, will engender enhanced stakeholder (including community) confidence and consent. In part, this relates to concerns regarding 'co-location' of infrastructure which, whilst efficient in system terms, has the potential to cause significant cumulative impacts on landscape and amenity.

Please do not hesitate to contact me if you would like to discuss any of the points raised in this letter.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Andy Tickle', with a long horizontal line drawn underneath it.

Andy Tickle

Policy adviser

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