

**From:** Rosie Pearson <pylons@mail.com>  
**Sent:** 16 August 2022 15:14  
**To:** RIIOElectricityTransmission  
**Subject:** Minded-to Decisions, Network Planning Review

For the attention of Neil Copeland  
[RIIOElectricityTransmission@ofgem.gov.uk](mailto:RIIOElectricityTransmission@ofgem.gov.uk)  
[Consultation on our Minded-to Decisions on the initial findings of our Electricity Transmission Network Planning Review | Ofgem](#)

Dear Mr Copeland

Thank you for the opportunity to respond to this consultation. I write on behalf of the Essex Suffolk Norfolk Pylons action group ([www.pylonseastanglia.co.uk](http://www.pylonseastanglia.co.uk)). We oppose the 180km 'East Anglia GREEN' pylons project, and 22,000 people have signed a petition calling for an offshore grid instead.

**We welcome the intent for greater strategic planning by the industry as set out in this consultation.**

In particular we agree wholeheartedly with the following paragraph and believe that much, much more needs to be done on this front:

*"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. As a result of the CSNP, TOs and other delivery bodies should be able to demonstrate **consideration of the cumulative impact** of new infrastructure if they can reference a single strategic plan which addresses all load related investments."*

**1. Engagement with communities**

Engaging with communities early and when there is genuine choice about options is essential. The East Anglia GREEN project has demonstrated that 'consulting' when it is too late forces communities into a position of opposition to a project that already appears well advanced. If the system had enforced early engagement across East Anglia it is likely that a very different project would have been created. National Grid now faces several years of battles through the planning system, with potential judicial review at the end.

Therefore the reforms mooted in this minded-to consultation should ensure that affected communities are engaged with as ideas are developed, not once a project has been seemingly decided upon.

**2. Consideration of environmental and other impacts**

The system needs to ensure an assessment of all impacts - social, commercial, environmental and health - of proposals. It is too focused on immediate cost-benefit of disparate projects. Following Treasury Green book guidance for all projects, including employing a natural capital approach, should be essential and enforced, even if delivered by the private sector. It is national infrastructure that's being developed, after all, and OFGEM, as regulator, is a government body

**3. Consideration of cumulative impacts**

Likewise, it is essential that cumulative impacts are considered. In the East of England we are bearing the brunt of the ongoing piecemeal, radial approach and this will only get worse as further projects are approved and further leasing rounds held.

**4. Strategic approach hampered by HND**

OFGEM's ability to deliver a strategically planned system has been severely hampered by the HND published last month, because it has allowed a continuation of business-as-usual, radial/piecemeal wind farm connections in the East of England. We have written to the OTNR expert panel seeking a meeting and stating that we do not believe the HND meets its own Terms of Reference and should not be approved. I attach the letter. We said, in short:

*"We are extremely alarmed by the recently published Holistic Network Design (HND) proposal as an outcome of the Offshore Transmission Network Review. It short-changes the communities of East Anglia, the environment and consumers and fails against its own Terms of Reference.*

*Our understanding is that the HND must be discussed by the Expert Advisory Group before approval by the Project Board. We would therefore like to discuss our concerns with the EAG before this takes place. We believe that the HND cannot be approved and must be re-opened to look again at the East of England."*

#### **4. OFGEM's duties**

It would be useful at every consultation to cross-check outcomes against OFGEM's duties. You will see from our letter to the OTNR that we believe, for example, that the HND fails against several of OFGEM's duties.

<b>OFGEM duty</b>	<b>HND/OTNR failing</b>
protect the interests of existing and future consumers	The HND neglects the financial benefits to the consumer of a coordinated offshore approach and allows the radial approach to continue
the need to contribute to the achievement of sustainable development.	The HND promotes the business-as-usual, radial approach that is damaging to coastal and onshore habitats and results in the need for greater infrastructure than a coordinated offshore approach.
have regard to those...living in rural areas	The HND (and hence East Anglia GREEN) has no regard for those living in rural areas. 89% of 2,500 people who completed the Essex Suffolk Norfolk Pylons survey said that the project is having an adverse effect on their quality of life & enjoyment of your home/rural environment?
promote efficiency and economy	Based on National Grid's own figures, the HND does not promote efficiency and economy, it promotes a costly and inefficient radial approach instead of a coordinated offshore grid
Protect the public from dangers arising from transmission	There have been numbers of pylon fires in the heat this summer – an offshore grid would remove that risk entirely. The health risks of EMF associated with high voltage transmission are noted by the World Health Organisation to need further research. That has not been taken into account in the HND yet 92% who completed our survey said they are concerned by the health implications of living near to pylons/cables (leukaemia, cancers, etc). Nor has the mental health impact of onshore projects been considered. East Anglia GREEN is taking its toll on individuals – 78% said the East Anglia GREEN proposals are causing them, or someone else they know, mental health issues
secure a diverse and viable long-term energy supply, and shall, in carrying out those functions, have regard to the effect on the environment	As above, the HND (and East Anglia GREEN) has no regard for the environment in East Anglia. Nor does it secure a long-term strategy as it neglects to plan for future rounds of offshore leasing.

We believe that OFGEM must intervene to ensure that a new HND process is initiated for the East of England and we seek a meeting with you to discuss.

We look forward to hearing from you.

Kind regards

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