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***East Anglian Alliance of Amenity Groups***

***25/8/23***

Ofgem CSNP consultation, August 2023

**Centralised Strategic Network Plan: Consultation on framework for identifying and assessing transmission investment options**

The East Anglian Alliance comprises an informal association of amenity groups, countryside organisations and community representatives in Essex, Norfolk and Suffolk.

While each group has specific interests in relation to Ofgem's consultation, they share common concerns about the significant impact on the region's communities and countryside.

Below we have responded only to those questions in which we have a particular interest.

**Background**

This response addresses the communications issues in the consultation where there has been a progressive deterioration over the past decade.

Local community groups are often portrayed as NIMBY minorities that lack an appreciation of the 'bigger picture'. Developers assume opposition and expect to discount most opinions received.

Alliance members have tried to take a more constructive approach and find ways of resolving conflicts where possible. Examples include working with Ofgem in developing an effective 'willingness to pay' survey format, which underpins the VIP scheme. At a local level, Alliance groups opposed the Bramford to Twinstead reinforcement when it was obviously premature (contrary to the assurances provided by National Grid) but have endeavoured to work constructively with NGET as it prepares the current DCO application.

If infrastructure projects are to progress at speed, there is an increasing need to improve communications throughout the industry and with those most directly affected. Unfortunately, recent system changes have made the situation worse. Like many other interested parties, Alliance members have campaigned for the separation of the ESO/FSO from the rest of National Grid. One unintended consequence is the way in which this has been used by both parties to deny responsibility for the most contentious decisions and to withhold essential information. This form of 'blame culture' has pervaded recent consultations and obstructed effective engagement. It seems likely some of the proposals in this consultation will exacerbate this problem; high level decisions being taken well in advance without any public scrutiny or consultation. Comparisons with totalitarian regimes have already been made and while there will be a variety of checks and balances it is difficult to see how they can be accessed by the 'lay public'. General distrust and endless legal battles seem likely to ensue.

Engagement in some other countries appears to be more effective and is mentioned in the responses below.

*Q1 Do you agree with our broad regulatory approach to establishing the FSO's obligations to deliver the CSNP products?*

In broad terms, yes.

*Q5 We welcome stakeholders views on how the FSO can communicate effectively about future system needs?*

Communication about future needs should begin at a much earlier stage with greater thought given to transparency. Announcements about the Norwich to Tilbury proposals seem to have been a surprise to many, including MPs in the area. This indicates a complete lack of understanding of our energy infrastructure and of the way in which decisions are made.

The concepts of Social Licence and Participatory Placemaking are poorly understood in the UK but are being used to good effect in other countries. Organisations in Australia<sup>1</sup> have developed ways to include communities in the process of delivering new infrastructure at an earlier stage and there is much that can be learnt and applied in the UK.

*Q6 What are your views on the FSO establishing minimum design requirements for high-level option designs and are there areas where exceptions are needed.*

Although this is a matter for the industry, we are concerned that decisions made for high level options can have unintended consequences or prove inappropriate when the necessary research is complete. At present some decisions seem so “high level” their application is problematic, to say the least. Better decision making and more thorough optioneering is needed, rather than imposing requirements at the earliest stages.

*Q13 Do you have any views on the decision-making framework to bring potential projects into the delivery pipeline for nearer-term needs.*

The decision-making framework cannot be merely cost based but must depend on a wider range of factors. A methodology is necessary to guide proposals but it seems inevitable that one method is unlikely to cover all aspects of an option and that the weighting of different factors will prove very difficult. ‘Best practice’ guidelines may be a better route but proposals from the FSO on how it proposes to tackle these issues should be made available for consultation.

*Q 15 Do you have any views on our proposal on inclusion of environmental and community impacts in the CSNP CBA.*

This is essential. Such impacts should be considered at every stage if public trust is to be regained.

*Q 18 Do you have views on our proposals for FSO to develop capabilities to consider different combinations of options and how this should be implemented?*

It is essential for the FSO to have the ability to take a range of optioneering approaches and to be able to engage with all interested parties in refining and analysing them.

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<sup>1</sup> *Acquiring Social Licence for Electricity Transmission*, August 2022 – Australian Energy Grid Alliance

Alliance members were stunned to learn that digital mapping of the seabed by the Crown Estate for scenario-based use had only recently begun.

Scenario mapping of offshore and onshore energy infrastructure options should be made freely available and should be publicised. Relevant timelines should be included, or the mapping should be sequential, to reveal the potential connection dates and their implications. We are aware of the problems that result from relying on single project LWR decisions. Better information leads to better decision making and would help the public understand the full implications of project decisions and the reasons recommendations have been adopted.

John Foster

For the East Anglian Alliance of Amenity Groups