



Historic England

Konark Anand
OfGem
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23 August 2023

Dear Konark / OfGem,

re: Consultation on framework for identifying and assessing transmission investment options.

The Historic Buildings and Monuments Commission for England (HBMCE), known as Historic England, is the Government's adviser on all aspects of the historic environment in England - including historic buildings and areas, archaeology and historic landscape – and have a duty to promote public understanding and enjoyment. HBMCE are an executive Non-Departmental Public body sponsored by the Department for Culture, Media and Sport (DCMS) and we answer to Parliament through the Secretary of State for Culture, Media and Sport.

We welcome the opportunity to respond to the consultation on the framework for identifying and assessing transmission investment options in relation to the Centralised Strategic Network Plan (CSNP).

We understand the CSNP covers onshore and offshore electricity networks in Great Britain as well as cross-border electricity interconnectors and offshore hybrid assets. While the focus of the CSNP is currently on electricity transmission networks, we appreciate the CSNP will evolve to integrate gas strategic network planning in the future. We would welcome further engagement when details are available for integration of the gas strategic network.

We support a strategic approach to transmission planning which brings environmental considerations into the high-level design. We welcome the inclusion of the historic environment as a key component in the holistic approach to environmental assessment.

In relation to stakeholder engagement, we note the proposal to that this should be based on open stakeholder engagement. We strongly support this and note the need for this to be proportionate but effective. We urge the inclusion of early engagement prior to the publication of the CSNP methodology and SEA to ensure that any issues are identified at the earliest opportunity.



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Engagement later in the project at the detailed design and EIA stage means the process is much less robust as it is too late to make a meaningful difference. We suggest that through early 'high level' engagement we can help to determine at a national level where infrastructure would be appropriate and where it may not be from a historic environment perspective, working with other disciplines and technical constraints.

Qn 2. What are your views on the types of system need that we have proposed are covered by the CSNP? Are there any gaps?

Table 1 includes "Strategic connection exercises" see footnote 26 which references HND so should include historic environment

Qn 3. Do you agree that the time horizon for system need assessment should be extended to 2050?

We have no comment on this proposal although we note the alignment to the 2050 target for achieving Net Zero.

Qn 4. Do you agree that the FSO should move to a year-round nodal assessment of system need as part of the CSNP?

While we do not take issue with the proposals we would note that there is a need that the FSO will require adequate resourcing to make a year-round assessment realistic and deliverable.

Qn 5. We welcome stakeholders' views on how the FSO can communicate effectively about future system needs?

We support the ambition to ensure the need that the FSO communicates its view on these effectively to different stakeholders and provides a timely call to action where relevant is achieved. Beyond that, we consider that this question seems to be focused towards frequency and scope of its publications, so it will need sufficient resourcing to provide digestible and targeted information to disparate stakeholders.

We note and agree with the point that it is vital that the FSO ensures the high-level designs put forward for consideration have been developed following a clear and consistent approach. This has not been a requirement in the past and more can be done to support this. We also welcome the proposal that the FSO develops and provides guidance on the minimum level of detail needed for high-level designs. This guidance should be followed consistently by all TOs, third parties and the FSO when developing options.

In section 5.10 we would welcome inclusion of consideration of historic environment aspects of the environment (including scheduled monuments, non-designated archaeology, and registered parks and gardens).





In response to the proposal in paragraph 5.11 *'We expect that in some areas, and for some mature options, it may be useful for the party doing the high-level option design to go further, and this should not be prohibited.'* Rather than saying not prohibited we would suggest this should be encouraged where possible/practical.

Qn7. Do you have any views on our proposals for considering environmental and community impacts as part of high-level design options?

We welcome OfGems proposals for the CSNP to support and build on best practice to identify environmental and community impacts and mitigations as part of high-level design options. As set out, the assessment of impacts is essential at the early stage to help mitigate delays in the later stages of project development.

We understand the need to limit the impact assessment to desk-top assessments as part of the development of high-level design options. However, it is important to recognise the limitations of desk-top assessments and the necessity for further assessment work at the detailed design stages. We also advise on stakeholder engagement with environmental technical specialists such as Historic England as we will be able to provide advice and guidance to supplement desk-top assessments. In addition, the timing and scope of desk top assessments should be clear, as should the ability to share this assessment data with TO's to form a baseline for detailed assessment work.

The proposal to incorporate a Strategic Environmental Assessment (SEA) in the CSNP process is welcomed. We strongly suggest having the opportunity to engage with the FSO at the SEA scoping stage to provide advice and support on how the historic environment can be incorporated into the assessment.

A SEA of the CSNP is encouraged and necessary in order to identify strategic impacts and fully assess alternative options. It may be necessary for OfGem to consider the timing of CSNP and how this relates to proposed environmental assessment reforms (including Environmental Outcome Reports) in order to ensure a strategic based environmental assessment is achievable.

The consultation recognises the value of early examination and this should be supported by early engagement. While OfGem is not proposing stakeholder engagement is mandated, a clear direction to the FSO regarding an expected minimum standard or best practice regarding early engagement would be welcomed. The opportunity for Historic England, as a statutory consultee, to engage with the FSO on environmental and community impacts is important for us.

Qn 8. Do you have any views on our proposal for the FSO to independently decide which network needs it may lead the high-level design of?

With regard to this proposal we consider it vital that the FSO have this capability so that it can use its strategic, whole system position to look beyond TO option proposals. This is welcomed as it will allow for holistic and strategic consideration of the impacts rather than a more piece meal approach. We would seek assurance that





the FSO will have resourcing to commission supporting research and that the weight of recommendations in subsequent decision-making is clarified. For example, “options” may just be framed as recommendations to Transmission Operators (TOs) with potential for different detailed solutions to be delivered.

Qn 11. Do you have any views on our proposals regarding the principles to be followed in the CSNP decision-making framework?

We welcome inclusion of environmental and community impacts in CSNP decision-making and the aspirations set out for the framework to be robust combining precision with a necessary level of uncertainty. It would be useful to have further details in the CSNP methodology on how these impacts are balanced with other areas of decision making such as financial viability and strategic engineering solutions.

Stakeholder engagement in the CSNP methodology, appraisal and decision-making process would be encouraged to aid understanding on how the different impacts are assessed and balanced in order to identify the preferred option for project delivery. We would be glad to be involved in contributing how to manage decision making in relation to historic environment impacts.

Qn 12. Do you have any views on our proposals on the decision-making framework for selecting potential projects to address longer-term system needs?

The consultation proposition is for the CSNP methodology to include a mix of economic decision-making support tools and qualitative analysis to support the selection of potential projects.

We suggest the methodology incorporates a range of economic, social and environmental decision-making support tools. This is necessary to ensure a holistic approach is taken to decision-making, including the historic environment, where all factors are appropriately balanced. This would also better align with the approach in HM Treasury's Green Book.

Qn 13. Do you have any views on the decision-making framework to bring potential projects into the ‘delivery pipeline’ for nearer-term needs?

It is important to consider resource implications of the multiple project approach and how this will impact on statutory consultees and other stakeholders. In addition, the environmental and community concerns mentioned in 6.19 should incorporate the historic environment.

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

The inclusion of environmental impacts, including those associated with the historic environment, in the cost benefit analysis is welcomed.





The suggested environmental impacts in the previous ETNPR consultation focused on the natural environment. We advise the inclusion of historic environment impacts in the CSNP methodology so that environmental impacts are assessed in a holistic way.

This also reduces project risks later in the process arising from historic environment legislative requirements. For example, inclusion of historic environment impacts would also take into account impacts associated with undergrounding and the cost/benefits when balanced against risk to archaeological remains of national importance.

Reference to the HM Treasury Green Book is welcomed. We would like the opportunity to engage with the FSO on historic environment considerations including the potential for cost benefit analysis to include [culture and heritage capital](#) analysis.

Qn 17. Do you agree with our proposal for the ESO to review its current approach to assessing short- and long-term solutions, and for the FSO to set out its approach in the CSNP Methodology?

Section 6.29 should include historic environment impacts including scheduled monuments and listed buildings but also buried archaeology and historic landscapes. There should also be mention given to the community aspects here also.

Concern about 6.39 given the impacts of the NTITY proposals. Cheapest not always best. This relates to heritage as well as natural environment aspects. Reference to Biodiversity Net Gain and Marine Net Gain should be included too, plus targets in 25 year Environment Plan (Feb 2023).

Qn 20. Do you agree with our proposal that the FSO should use reasonable endeavours to support relevant stakeholders as part of the offshore asset development process?

We consider that the reference to reasonable endeavours (paragraph 7.22 of the consultation) has the risk that the FSO can only make recommendations and the market might decide otherwise. Therefore, it is important that the ambition and associated stakeholder engagement is clarified and strengthened.

Thank you for the opportunity to respond to this consultation. Please feel free to contact me if there are any points which require further clarification. Historic England would also welcome engagement in future OfGem consultations in relation to energy generation and transmission.

Kind regards

Luke Wormald
Head of East Region and Infrastructure

