



28 August 2024

To Jon Sharvill, Head of ET Investment Strategy

Dear Jon Sharvill,

I am writing to respond to the 'Consultation on the proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects'.

I learned about this so-called 'consultation' today through a friend and have only just been able to access the proposal online. The deadline is 30th August. Yet in the first paragraph of this document, it is clearly stated that Ofgem particularly "clearly welcomes responses from consumer groups, other stakeholder and the public".

With respect, you have made no effort to contact those members of the public and communities who will be most affected in the regions where you intend to carry out the proposal. There is no possibility that 99% of the people in our area of Friston, Snape, Saxmundham, Sternfield and Benhall will have been able to see this document, find the time to read all it, understand the implications for their area and lives, or to respond in the time allowed. Indeed, it is unlikely that they will know of its existence. I anticipate that this is much the same for communities across the UK whose local villages, countryside, market towns, and landscapes will be impacted by this project.

Aside from your failure to communicate the existence of this proposal to each region in a timely manner, the language of the document is almost impenetrable. Starting from the very beginning, the proposal is full of terminology and jargon that many people will fail to understand or be daunted by. Some of the terms are so vague as to be without meaning. It is also full of acronyms. For example, page 6 repeatedly uses 6 different acronyms - TO, ESO, tCSNP1, ET, ASTI, tSNP2, CPP2030, which will mean nothing to most readers. And this is just the beginning.

This 'consultation' is the third in a series of consultations about electrical infrastructure projects with deadlines over the past 4 weeks. At this point, given that they are all for separate but interrelated projects, the community, if it does find access to them, will be quite overwhelmed with the amount of information to digest, and find it difficult to understand how it will impact on them.

For these reasons alone, your consultation process does not pass the Gunning Principles tests and should be substantially revised to allow the proposals to be communicated in a timely manner to local populations, and to ensure that they are communicated in plain and clear English.

I also wish to express very clearly that this is NOT a consultation. Aside from your minimal efforts at contacting communities, and the overwhelming nature of the document, this is clearly a strategic plan that has already been developed and what response the community makes, should they have the possibility to see this present 82 page document, is likely to have small impact on the decision-making process. At the same time, it is so vague in places as to make the proposal a request for 'carte blanche' permission to conduct almost whatever is decided in the moment, regardless of its impact on each region.

Aside from the failings of the 'consultation' process, there are several serious concerns and structural problems with the proposal itself. There are economic concerns, environmental concerns and ethical concerns.

Economically, this reads as a project which takes a short-term approach to financial gain and the cheapest, quickest way of solving the problem of how to provide renewable power to the country. While this may be 'economical' for investors, in the long term, it is not so for the UK economy, and lacks the vision for the potential that this opportunity offers.

We could, as the country with the most productive windfarm system in Europe, be ensuring that the infrastructure and power generated benefits the UK economy as a whole. For example, this would mean allowing time for developing use of new technology such as superconducting sub-sea cables, which could conduct five times as much electricity as those currently in use. It would also allow for ensuring that as much of the infrastructure as possible was offshore, which would cause the least interventions on our local economy and community, an example our neighbours in Europe already are setting. It might take a little longer, but the Government has already said we cannot be zero carbon by 2030. Taking a long-term economic approach could also mean that the government ensures that this new electricity generation remains as a nationally-owned system, eg 'Electricity UK' or similar, rather than providing profits to National Grid alone. We should by now have learned the lessons of the development of North Sea Oil, where Orkney and Shetland, as well as Norway, by their initial decisions and contract-making process during that period, ensured that a good proportion of the profits was directed to the communities concerned.

Further economic concerns include that several of the costings in the document are not transparent and so are difficult to assess in relation to alternatives and could build up significantly. Some costs, such as biodiversity net gain, have not been included, and several look to be serious underestimates. The contingency is also very low.

Environmentally, first and foremost, the proposal, and Ofgem's response, must adhere to the Treasury Green Book Guidance. This is obligatory. The infrastructure project must also minimise damage to the local environment. This is our heritage and our children's

heritage and we, and you, are custodians of this environment for the future. The proposals for Suffolk as they stand will significantly industrialise the rural environment of the region, damaging local nature and local heritage, and will have a knock-on impact on biodiversity, education (at present schools bring children to the area for educational projects and sessions) and linked to the above, the tourism economy on which the region depends.

Ethically, the role of the ESO as regulator completely compromises the proposal. The ESO, as a part of National Grid, clearly has a conflict of interest and as such is not in a position to make a judgement. How can they 'identify optimal dates' for delivery, for example. This is alongside the lack of timeliness and clarity in the 'consultation', the disregard for the UK's best economic and environmental interests and current short-termism of the proposal.

Finally, in regard to environmental and community impact, the scale of this development, alongside your communications, will both overwhelm local communities such as ours, and change the face of the UK landscape as a whole for ever. Its legacy, as the project stands, will cause untold damage and those currently responsible will in the future be held to account as to whether they decided upon the wiser, future-looking path, or the short-term path.

I respectfully request that this consultation allows the time so that communities can be more involved in our path to Net-Zero, that alternatives are explored, and that a proposal which benefits us all can be delivered.

Thank you.

