
Call for Input – Growing Great Britain’s electricity network supply chains: Ofgem position and call for evidence

Response from The Crown Estate

8th May 2026

1. The Crown Estate

Who we are

The Crown Estate is a purpose-driven and unique business with a diverse portfolio. We manage the seabed and around half the foreshore in England, Wales and Northern Ireland, playing a fundamental role in the sustainable development of these important national assets and using data and evidence to facilitate co-location and greater spatial coordination between activities.

Our ownership also includes a substantial rural portfolio, including the world-renowned Windsor Great Park. Alongside this, we operate some of central London’s best places to work, shop and experience, as well as regional retail and leisure destinations across the country.

Established by an Act of Parliament, The Crown Estate works to create social, environmental and financial value, both now and for the future, for its customers, partners and the nation. We return 100% of our net revenue profit for the benefit of the nation, contributing £5 billion to the public purse over the last ten years.

Our purpose

As a business, we actively deliver against our purpose, which is to create lasting and shared prosperity for the nation. We believe we are well placed to create financial, environmental and social value holistically today and for future generations, by drawing upon our unique attributes to address long-term trends and national needs. Combining our independence and scale of ownership with our ability to convene multiple stakeholders and take a long-term view with patient financial capital, we can play a significant role in creating and accelerating new opportunities – including for the growth of renewable energy. We drive our purposeful activity through four strategic priorities, to:

- Enabling the UK’s transition to a low-carbon, climate-resilient and energy-secure future
- Protecting, restoring, and connecting people with nature, across land, cities and sea
- Contributing to inclusive growth that unlocks potential and enabling communities to thrive through improved access to new homes, jobs and infrastructure
- Responsibly generating financial returns and value for people in the UK

2. Our response

As the consultation covers several aspects of the transmission regulatory landscape which are not central to our remit, our response reflects The Crown Estate’s statutory role and practical experience supporting offshore wind

and transmission delivery, and our visibility of supply-chain interactions across the system. We offer evidence-led observations to support coordination and consistency, while remaining mindful of Ofgem's duties, levers and remit.

Question 3: How could Ofgem strengthen incentives to invest in resilient and sustainable supply chains, and remove regulatory barriers to doing so?

We broadly welcome Ofgem's proposal to introduce proportionate, standardised reporting on network procurement, and the intention to make outputs publicly available where appropriate, as this should improve collective understanding of supply chain capability, constraints and opportunities.

We would welcome consideration for the interaction between onshore network procurement and the offshore electricity transmission and generation pipeline when assessing supply-chain incentives and reporting.

While this Call for Input focuses on onshore transmission and distribution networks (and interconnectors), many of the same components, manufacturing capabilities and specialist services are required for offshore network delivery—particularly OFTO-related assets. In parallel with the onshore grid upgrade programme, The Crown Estate is pursuing major catalytic activity through its Supply Chain Accelerator, Supply Chain Investment Programme and the Offshore Wind Industrial Growth Plan, with ambitions to bring a further 20-30GW of offshore capacity to market by 2030 (inclusive of Leasing Round 6).

This represents a material, time-aligned demand signal to the same supply chains that will be serving ASTI, APM and wider RIIO-ET3/ED3 investment. There is therefore a risk that narrowly-scoped or uncoordinated incentives and reporting requirements could inadvertently create competition between onshore and offshore orders, driving price inflation or capacity bottlenecks rather than improving resilience.

The Offshore Wind Industry Council are actively considering the offshore wind transmission supply chain in the context of the delivery of current and future projects. We would welcome Ofgem engagement in the active considerations which can inform Ofgem's approach to transmission supply chain activity across offshore and onshore.

We would encourage Ofgem to work with government, OWIC, and relevant delivery bodies to ensure emerging approaches to procurement transparency, incentives and market signalling are consistent and holistic across onshore and offshore networks, so that supply-chain capacity is scaled coherently and delivers long-term value for consumers.

We note that the proposed reporting framework applies to onshore transmission and distribution networks, and explicitly excludes interconnectors. This could create a partial system view, as interconnectors rely on many of the same manufacturing capabilities, suppliers and specialist services. It would be helpful for Ofgem to clarify the rationale for this boundary, and whether there may be value in ensuring greater alignment in how procurement data is considered across onshore networks, offshore transmission assets and interconnectors over time.

Question 4: What definition of a UK-based supplier and UK 'material value-add' (e.g. assembly, manufacturing) would keep reporting practical while delivering meaningful insight?

Whilst The Crown Estate don't have evidence relating to onshore transmission supply chain definitions, we welcome approaches which can drive consistency of definitions across all sectors of the economy, so impact on supply chains and local communities can be compared. This consistent approach could also be applied across other regulated sectors for example into telecoms, power, Oil & Gas, etc.

There are two approaches used in offshore wind which could be considered to inform Ofgem's emerging thinking.

1. Crown Estate Scotland (CES) 'ScotWind' Option Agreement clause c24.1 Definitions
"Scottish Expenditure means any element of the Expenditure incurred (i) by entities registered, resident or having their principal offices in Scotland and (ii) where the location of the service received or the product produced in exchange is in Scotland."
 Whereby, for a UK context, the definition could be updated to 'UK'.
2. [BVGA 2015 methodology](#) provides a standardized approach for measuring UK content in offshore wind projects, defining it as the value of supplies, labour, and profits retained within the UK. Commissioned by [The Crown Estate](#) and RenewableUK, it offers instructions for developers to collect data across the supply chain, facilitating the calculation of direct and indirect Gross Value Added (GVA) and employment impacts

The different approaches offer simplicity, or more complex and accurate definitions and reporting. These could be considered and applied to transmission assets.

Question 8: Should we include social-value and/or supply-chain-length indicators where proportionate? Which indicators are most useful for resilience monitoring and why?:

We support approaches which consider social value and supply-chain-length indicators. The consultation document notes that investment in deprived areas and commitments to Science Based Targets could inform decisions backed by evidence. We would welcome further clarification on how this may be applied.

These criteria form a core consideration as part of the Government's Clean Industry Bonus scheme for offshore wind as part of the CfD allocation framework. Where appropriate, we would welcome consistency on definitions and application of criteria in CIB across the energy system. This can help ensure that offshore decisions relating to supply chain and social value are commensurate and reinforcing.

Question 12: Are there any implementation risks, costs or unintended consequences we should consider at this stage?

We strongly support the objectives of ASTI and the Advanced Procurement Mechanism in accelerating delivery and de-risking supply chains. However, acceleration must be achieved in a way that is complementary to, rather than disconnected from, consenting, land and seabed rights processes.

Recent examples—such as early funding decisions referencing project dependency on planning consent and land or subsea rights—highlight the importance of alignment across the delivery chain. Without careful alignment across planning, consenting and land or seabed rights, supply chain incentives intended to accelerate delivery risk increasing uncertainty for developers and suppliers, or leading to inefficient or stranded commitments.

We would welcome continued engagement with Ofgem and Transmission Owners to ensure that incentives for early procurement and supplier commitment are aligned with appropriate incentives to progress land and rights agreements, including with landowners and seabed managers, in a timely and proportionate way. This alignment is essential to avoid coercive behaviours, safeguard public confidence, and ensure acceleration delivers genuine system benefit.

3. Concluding remarks

We trust that you will find our comments on the consultation constructive. We would be willing to engage further and provide additional information on any of the points we have raised.

All of this response may be put into the public domain and there is no part of it that should be treated as confidential.

Yours Sincerely,



Chris Gent,
Energy Policy Manager