

Historic Environment Scotland

Àrainneachd Eachdraidheil Alba

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By email: TransmissionCompetition@ofgem.gov.uk 11 January 2016

Dear Mr Norman

Extending competition in electricity transmission: arrangements to introduce onshore tenders

I refer to the proposed arrangements set out in the consultation document published on 19 October 2015. Historic Environment Scotland is a statutory consultee for applications for planning and other consents across Scotland for developments affecting category A-listed buildings and their setting, scheduled monuments and their setting, World Heritage Sites, Inventory battlefields or Inventory garden and designed landscapes. Where an application is accompanied by an Environmental Impact Assessment, Historic Environment Scotland is also a Consultation Body under the terms of the relevant regulations.

We have reviewed the proposals set out in the document for our interests as set out above and have the following comments to offer.

- Under the arrangements set out for the late CATO build model, it appears that broad corridors are what would be the subject of the application for consent. We have concerns that this may impact on our ability to undertake our statutory responsibilities in relation to EIA and for our historic environment remit if a consent is granted without sufficient detail of the project. It is not clear from the consultation document how the detail of the development would be addressed. Is it envisaged that a multi-stage consent process would be required? For example, a consenting process similar to planning permission in principle and a further application to address detailed matters in the planning system.
- In the early CATO scenario, the consultation document states that bidders would be expected to undertake an assessment of the effect of their designs on the environment. However, it is not clear how much input this would require from consultation bodies or community groups. It is not clear how many bids ofgem (or the SO) would be looking for, or how many might be submitted. We would be concerned that a significant amount of effort could be put in to providing advice on projects that may get consent but that are never delivered. This has obvious resource implications. It would be helpful if these parameters were clarified.
- In the early CATO model, it is recognised that most of the detailed surveys, environmental studies and engagement would take place after the CATO was appointed. Again, the level of involvement the CATO would seek from statutory consultees is unclear from the consultation document. We would be concerned that, if in an attempt to make the transmission market more competitive for consumers the new arrangements simply passed on costs to the public sector.
- It is not clear who would have oversight of the tender process.

- It is possible to draw parallels between what is proposed in the consultation document and the delivery of other types of infrastructure development in Scotland from our perspective as a statutory consultee. However, the main difference between the two is that for Trunk Roads the 'system operator' role is performed by Transport Scotland and there is a wide range of experience, guidance, policy and good practice which guides the development of these projects. There is no clarity in your consultation on who would perform this role. In relation to electricity transmission projects, the role of the SO would be critical in overseeing this process, in setting clear standards and guidelines that would be applicable across the whole of Great Britain and for ensuring that an appropriate level of engagement was undertaken. Whilst we would be happy to assist with this work we would encourage you to clarify roles and responsibilities in any future consultation.

I hope these comments are helpful to you.

Yours sincerely

Adele Shaw
Heritage Management Team Leader (EIA)