



Mr Neil Copeland
Ofgem – Electricity Transmission
10 South Colonnade
Canary Wharf
London
E14 4PU

Enquiries to: Phil Watson – SCC Strategic
Energy Projects Manager / Naomi Goold –
ESC Energy Projects Manager

Email: Phil.watson@suffolk.gov.uk
Naomi.Goold@eastsuffolk.gov.uk

RIIOElectricityTransmission@ofgem.gov.uk

Date: 11th August 2022

Dear Mr Copeland,

Consultation on the Minded-to Decisions on the initial findings of the Electricity Transmission Network Planning Review

Suffolk County Council and East Suffolk Council (the Councils) welcome the opportunity to comment on Ofgem's minded-to decisions in respect of the Electricity Transmission (ET) Network Planning Review.

The Councils welcome the content of the consultation as it recognises many of the concerns that they set out in their response to Ofgem on 16 December 2021¹. The Councils are particularly supportive of those parts of the minded-to decisions which address environmental and community impacts, and the need for transparency of process, these sections have been set out in the attached appendix for ease of reference.

Based on the findings of the minded-to decisions, the Councils expect that the framework outlined in respect of communities, the environment, and transparency, will be carried through to the next stage of the process, and fully and robustly incorporated into detailed proposals for Transmission Network Planning.

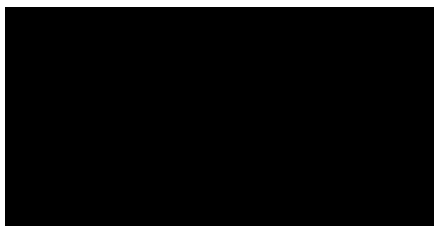
As the Councils have set out previously, it is considered essential that effective strategic assessment of the environmental impacts of strategic plans for network design, are robustly and effectively carried out, prior to the detailed assessment at the consenting stage of an individual project, or projects. Likewise, as recognised in the minded-to decisions, there is a pressing need to improve transparency in network planning and create opportunities for effective engagement within this process, for both local authorities and communities.

¹ <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/major-infrastructure-projects/SCC-and-ESC-ETNPR-consultation-response-161221-Final-Redacted.pdf>

Therefore, having set out a positive overall approach to these issues, it is essential that the regulator is able to stay the course, and ensure that the detailed process of network planning to be developed at the next stage, fully incorporates, and delivers these aspirations.

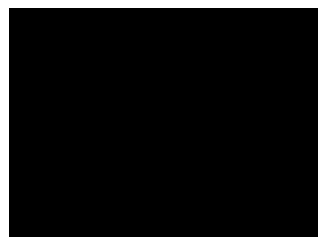
The Councils look forward to continuing our engagement with the Review and considering the further details published as part of the next stage of the consultation process. We welcome the continued development of a network planning regime which seeks to effectively address environmental and community impacts and rebuilds public confidence in the process. The Councils consider this essential to enable the effective delivery of the necessary transmission infrastructure required to support the achievement of the Net Zero goal.

Yours sincerely,



Richard Rout

Cabinet Member for Environment and
Deputy Leader of Suffolk County Council



Craig Rivett

Cabinet Member for Economic Development and
Deputy Leader of East Suffolk Council

Appendix

Considering the environmental and community impacts of new infrastructure

2.42. New infrastructure will be required to decarbonise the energy system. The TOs (and other developers in the energy system) need to take account of community and environmental constraints (eg the valid concerns of communities impacted by proposed new infrastructure and areas of outstanding natural beauty respectively) when developing proposals, if they do not, proposed developments will not receive consent.

2.43. Developing a new process for network planning that includes consideration of environmental and community impacts will facilitate demonstrable, transparent consideration of environmental and community impacts by network licensees at an earlier stage than occurs today. As a result of the CSNP, TOs and other delivery bodies should be able to demonstrate consideration of the cumulative impact of new infrastructure if they can reference a single strategic plan which addresses all load related investments

2.44. When developing new network-wide planning methodologies, we expect the FSO will have due regard to the appropriate planning and consenting processes when undertaking the earliest stages of spatial network planning.

2.45. Whilst the output of a new planning process may give visibility of the cumulative impact, this may not be enough to secure the support of impacted communities. To ensure the outputs of the new CSNP process stand up to challenge, we are seeking to address concerns around transparency at earlier stages in the planning process, such as when estimating future load.

Transparency in all stages of the network planning process

2.46. Several stakeholders have noted that the existing processes lack transparency. Concerns were raised about all stages of the GB-wide planning processes, ie FES, ETYS and NOA. However, the stages of planning undertaken by TOs (prior to non-statutory consultations on consenting) are likely to be even less obvious to stakeholders. Given that the CSNP should encompass all load related planning and inform a central plan, it is important that stakeholders have visibility of how that plan is developed. This includes potential decision-makers such as Ofgem, the Department for Business Energy and Industrial Strategy (BEIS) or planning bodies, but also impacted communities who may have concerns about proposed infrastructure. Ensuring transparency means that the justification for infrastructure should be more easily defended than if stakeholders do not know why one solution is preferred over another.

2.47. It is our view the fact the FSO is intended to be an independent public corporation means it is best placed to develop a transparent process. Moreover, the FSO's GB-wide role should provide the body with the visibility required to implement this process and supports our view that they should be responsible for leading the implementation of the CSNP.