



Dear Mr Anand,

Thank you very much for allowing us the opportunity to participate in the *Consultation on the initial findings of our Electricity Transmission Network Planning Review*.

CARE Suffolk CIC is an amenity group of residents in the parish of, and parishes around, Bramford, Suffolk. We have reviewed the accompanying report to the consultation, and submit our feedback to the questions as follows.

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**Question 1: What are your views on our key objectives for future ET network planning arrangements that can deliver Net Zero at lowest cost to consumers?**

The key objectives are welcomed, in particular the holistic planning, and a fair and transparent assessment of network options.

However, there appears to be a key theme woven throughout the document, and which receives an overwhelming focus, which is at "lowest cost to consumers."

It is widely established that lowest cost rarely means best value, and neither does it always mean the best option economically. It must be remembered that those in the affected local communities are also consumers. So lowest cost for consumers equally means lowest cost for the affected communities. If a community is shouldered with a disproportionate amount of adverse impacts of development, then the cost to them overall is very high and not in alignment with the objectives.

However, in p4.20 it states "*We consider that the economic assessment should include a cost benefit assessment methodology that strikes an appropriate balance between cost and environmental and community impact.*"

This balance is a much more welcome approach and if implemented correctly will help to secure public confidence in the implementation of a holistic network. However, more is needed to define what costs, environmental and community impacts will be included in the balancing of the cost benefit analysis (see q5).

**Question 2: Are there any other key workstreams that interact with the review that we need to align with?**

We believe that development of CSNP will need to align with the recent NSIP Consultation and Energy NPS Consultation in regards to EN-5 specifically.

**Question 3: Do you have any views on the scope of the review? Are there any key topics that we have missed?**

The current scope of the review has an overwhelming focus on cost, and a more balanced inclusion of socio-environmental impacts needs to be included to ensure a truly sustainable approach is taken to the CSNP.

**Question 4: Do you have any views on the success criteria? Are there any key area that we have missed?**

The success criteria was developed with input from the Strategic Advisory Group (SAG), however we note that SAG is specialised in "corporate finance and investment banking." There appears to be no involvement of other

stakeholders such as local authorities in the drafting of these criteria, and it clearly shows in the criteria chosen so far.

We would like to propose *“Minimises the onshore infrastructure and the associated impacts on local communities, the environment and landscape”* as an option for success criteria. After all, the transition to a holistic design was greatly influenced by the need to reduce onshore impacts. If that need is not reflected in the success criteria then the purpose of the CSNP and HND will not be realised.

We hope this consultation seriously considers the success criteria put forward by local authorities, amenity groups, and the public to create a more holistic set of success criteria overall.

**Question 5: What are your views on our enduring vision for Centralised Strategic Network Planning?**

Whilst we are in agreement with the enduring vision proposed in 4.3, and that these technical and regulatory aspects should rightly be included, we feel the section relating to the cost benefit analysis is underwhelming.

Where p4.20 mentions an appropriate balance between cost and environmental and community impact, it would appear that the list of impacts considered in p4.21, p4.22, and appendix 2 is not sufficient for an appropriate balance to be determined on the overall cost to the local host community. For example, stage 4 of appendix 2 should also include other statutory and non-statutory designations such as National Parks, Special Protection Areas, Special Areas of Conservation, as well as areas that are currently provided as mitigation for other existing development. As an amenity group who already live in close proximity to major infrastructure, we would also like to see operational noise included in the assessment.

**Question 6: Do you have any views on the proposed central network planner’s role, who that planner might be, and how it may perform this function?**

Our only comment is that local authorities and amenity groups will need to be included as stakeholders in any consultations.

**Question 7: What are your views on the proposed stages and focus of the enduring CSNP model? If you can suggest alternative approaches to any of the stages, then please do so.**

The stages appear to be in a reasonable order, however it is not clear at what stages various stakeholders will become involved.

There is a brief mention of “relevant stakeholders” in stage 3:

*“The central network planner should ‘own’ this stage but would be expected to engage with TOs to get any information on their assets or sites to be able to make informed solutions. The central network planner should also engage with other relevant stakeholders to seek their inputs as necessary. The central network planner should also consider using the services of 68 Consultation - Initial findings of our Electricity Transmission Network Planning Review specialists in planning consents and project delivery to ensure that viability of solutions to get planning consents is considered at an appropriate level at the early stages of network planning, and the impact of any solution on local communities and the environment is also considered to avoid deliverability issues later on.”*

Whilst we agree that the central network planner should own this stage, it would be useful to define who the “other relevant stakeholders” are. This would be an appropriate stage to include local authorities and amenity groups.

**Question 8: What are your views on closer stakeholder co-working to break longer-term uncertainty deadlocks?**

We would welcome closer stakeholder co-working at all stages.

**Question 9: What are your views on allocating risks and accountability for various aspects of the CSNP, and for delivering the options finalised under CSNP? Do you have any suggestions to mitigate any of the risks?**

No comments.

**Question 10: What are your views on the proposed Transitional arrangements?**

In principle we have no issues with the transitional arrangements proposed, however as part of the East Anglian Alliance of Amenity Groups we are not currently up to date with progress from BEIS and the ESO, so are unable to make any specific comments.

Again we see the mention of other stakeholders, and would like to see some definition of who those stakeholders might be. We would like to see local authorities and amenity groups included in this otherwise there is an increased risk of undermining public confidence in the holistic design we are to transition to.

**Question 11: Do you have any views on the next steps to implement CSNP?**

No comments.

**Question 12: What are your thoughts on our initial view of the areas to be covered in the next phase of the review? Are there other areas that aren't included that you would like us to include?**

The initial view of the next phase seems appropriate, however the results of this current consultation will need to inform it. It is important that local authorities and amenity groups are engaged as stakeholders throughout.

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We look forward to seeing the report detailing the findings from this consultation, and to keeping involved with future consultations.

Yours Sincerely,



Samantha Main

Chair, CARE Suffolk