

23 November 2021

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Offshore Transmission Network Review: Consultation on Enduring Regime and Multi-Purpose Interconnectors: Consultation Response

Towards a Strategic Plan

1. We think that a more strategic approach to the planning and development of offshore wind is needed to achieve the Review's objectives. Do you agree? Please explain your answer.

Yes – SPS has long called for a more strategic approach to the planning and development of offshore wind that will result in high levels of coordination both of offshore and onshore infrastructure. A coordinated approach to offshore generation and connections to the onshore transmission network will reduce both the amount and extent of onshore transmission infrastructure. A strategic approach would allow for more rigorous testing of need, alternatives and landscape-scale choices of best locations and routes prior to submission of applications. Time taken in relation to front-loading appropriate environmental assessment (including environmental net gain approaches) is necessary to help meet carbon targets earlier and to reduce the environmental impacts of new infrastructure and connections. This will also reduce impacts on communities and will help to restore public confidence in the NSIP process of delivering significant energy projects that has been seriously undermined by the current uncoordinated approach.

2. If you agree with Question 1, do you have any views about the scope of the strategic plan? For example, should it cover generation or be limited to transmission?

Significant energy generation schemes, have the potential to impact the requirements for the energy transmission network and therefore, both generation and transmission, as well as energy storage infrastructure, should be included in a Strategic Plan. The purpose of an Enduring Regime must be to

deliver a Strategic Plan that is the subject of both Strategic Environmental Assessment (SEA) and a Habitats Regulation Assessment (HRA) in line with Strategic Planning principles and adopted as best practice by other bodies such as the Crown Estate in their delivery of sea beds for offshore wind. However, this best practice is currently not adopted by National Grid, who in the production of the Network Options Assessment (NOA) are not required to produce a SEA or HRA. A Strategic Plan must require the removal of this concession because the delivery of the net zero targets by 2030 will require a rapid increase in onshore infrastructure including transmission networks, and the likelihood of cumulative effects of multiple schemes interacting (especially in Suffolk and across East Anglia) requires transparent and clear sighted co-ordination of projects rather than the ad hoc “first man wins” principle, which has the potential to trigger large scale environmental harm which is incapable of effective mitigation, as well as resistance from affected communities.

3. What governance arrangements would be appropriate for a strategic plan? For example, who should be the lead organisation, and what roles and responsibilities would other partner organisations have?

A Future System Operator (FSO) should be the lead organisation for the governance of a Strategic Plan.

4. How should stakeholders be consulted during the development of a strategic plan?

A transparent and effective process of consultation is essential to ensure stakeholder and public confidence. A Statement of Community Involvement (SCI) should identify those organisations, local authorities and community groups which need to be consulted. It will be essential that environmental and community stakeholders have a strong role in the development of a strategic planning approach, beyond that of simply being consulted, in order to improve social consent for new infrastructure. Effective engagement will require a variety of approaches with the various organisations whether through regular briefings, workshops or online meetings etc.

5. What time-period should be covered by a strategic plan and how frequently do you think it should be updated?

Although a strategic plan should cover a period of at least five years, it will require regular reviews and updates, taking into account changes to the network and emerging opportunities or constraints, to prevent the document becoming out of date and ineffective.

Holistic Network Design

6. We think that there is a need for a Holistic Network Design that plans offshore transmission for the long-term as an integrated part of a transmission network, Do you agree? Please explain your answer

Yes – a Holistic Network Design will provide greater certainty for planning for associated infrastructure and consider the cumulative environmental and community effects with existing and potential future infrastructure requirements.

7. If you agree with Question 6, do you think a Holistic Network design should also include onshore transmission?

Yes

8. Who do you think is best placed to undertake a Holistic Network Design? Please explain your answer.

A Future System Operator (FSO) would be best placed to undertake the HND, in close collaboration with the relevant environmental and community stakeholders which should have a strong role in the development of the HND in order to inform the innovative approach to strategic planning and environmental net gain required to improve social consent for new energy infrastructure.

(SPS does not wish to respond to questions 9 to 14).

23.11.21