

September 12th 2024

Dear Mr Sharvill,

Thank you for the opportunity to add to the consultation response made at the end of August. I have set out below my answers to the first two sets of questions only.

My main points are based on the view that reducing delivery times under TAAP from 14 years to seven, the CAP timeframe from 5 years to 6 months, and of course now the national target from 2035 to 2030 is clearly going to drive down the quality and completeness of the options, planning and engagement processes that your consultation; and that the engagement of local communities in this vast new industrialization of the countryside is therefore more critical than ever – but is being disregarded in CBA, as well as in the simple governance of public affairs. Local communities can be financially compensated, but this is not the same as having their views on the environments and ecologies in which they live respected. We live in rural areas, but we do not have the right to sell their integrity for cheaper energy.

Yours sincerely,

Q1. Do you agree with our assessment of the tCSNP2 and the risks that we have identified?

I would agree that you have correctly assessed the tCSNP2 and identified the risks that lie within the oddly narrow range that you accept as lying within your competence. It is not clear however that the overarching and immense risk that lies with accepting a change of government target from 2035 to 2030 has been in any real sense accepted and dealt with - as witness para 2.2:

Despite this uncertainty, we are confident that a significant proportion of the transmission network upgrades recommended by the ESO in its tCSNP2 will play an integral role in meeting Net Zero by 2050 and will therefore be required to be delivered.

- which seems to be an admission that if a project can't be clearly identified as being critical to a 2035 target, which has become a 2030 target, it will, one way or another, be helpful in meeting a longer-baselined target, which is currently unchallengeably vague. This is not encouraging.

In terms of vagueness, and also of course completeness, nor can I see anywhere that the risks to *communities* consequent on this huge and unwieldy programme of rural industrialization have been properly taken into account. Throughout the document, the costs to consumers are without exception confined purely to the question of whether costs passed on to the consumer have been considered as part of the CBA, which is to say that they exclude any consideration of costs that are not directly quantifiable on the front page of a future electricity bill. There are other costs to consumers, both individually and as groups.

Q2. Do you agree with our proposals for the “Development track”?

Q3. Do you agree with our proposals for the “Delivery track”?

Q4. Do you agree with our proposals for the “Small / Medium Sized Project Delivery Track”?

No on all counts, as I cannot agree with the level 1 to level 6 methodology used in developing ‘maturity levels’ for these development and delivery tracks. This allows, in the L1/L2 scoping and strategic optioneering phases, proposals to come to a point where strategic options are baked into the later phases of project development, and thus puts communities responding to the ‘consultation and engagement’ exercises perpetually on the back foot.

Detailed design development (level 3) is notionally subject to consultation of some sort, but at this stage the ‘design’ in the ESO’s view is a question of routing and constraint-avoidance – whereas to the community engaged in the process of considering a major, permanent industrial installation in their village or fields, or across a National Landscape of SSSI, it is a question of major, possibly critical importance.

The Jacobs report, *East Anglia Onshore & Offshore Cable Routing - Environmental & Community Appraisal, March 2024*, prepared for the ESO is a prime example of this after-the-decision style of consultation and engagement. At level 1 and level 2, decisions on ‘detailed’ routing and infrastructure placement are left for processes in level 3; at level 3 they are consulted upon with an assumption that these difficult decisions will be taken in more detail at Level 4, using Jacobs, say, to provide assurance that there will be a way forward to avoid unfortunate local impacts, although it is not yet visible. At no point before the detailed planning process is underway does the community, or its representatives, have the opportunity to engage in a joint impact assessment that is not purely based on the *cost* and the *pace* of the solution already agreed upon by industry stakeholders. This is fairly clear from the ESO’s own *Beyond 2030* document, where at p17 we have:

‘Communities will be consulted by industry when these recommendations become more refined...’

It is no surprise that on the preceding page of that very optimistic document there is a ‘stakeholder diagram’ that excludes so-called ‘host’ communities entirely, although there is a spot for their ‘political representatives’.

Finally, from the consultation document itself, there is this confession:

3.4 *In the majority of cases, we consider that the low level of maturity of project designs, project costs and the delivery dates used in the Cost Benefit Analysis (CBA) results in a less robust economic assessment. We consider that more work needs to be done by the TOs to undertake development and detailed design of the projects so that there is greater certainty on project scope, delivery timings and costs, to be used in a more robust refreshed economic assessment, before we are able to provide material funding and set delivery targets and outputs for the TOs.*

This would seem to be an opportunity to add into the earlier stages of project design the opportunity for earlier engagement with the consumer, which could in itself lead to a more robust and detailed understanding of how projects can be brought to the planning and consent phases.