

11<sup>th</sup> September 2024

Dear Mr. Sharvill,

**Re: Consultation on the proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects**

We write as the many communities affected by the rapid extension of the Transmission Network and associated infrastructure which is threatening our landscape and our lives.

We are particularly concerned about the proposed onshore infrastructure that forms part of Beyond 2030 / tCSNP2.

We appreciate the consultation requested responses to specific questions but this addresses the fundamental issues underlying your consultation.

**Early and Fair Consultation**

The communities affected should have a proper and early voice in issues having such a significant impact on their area. We believe technologies used in many developed countries, particularly the use of HVDC, offshore infrastructure and Grid Enhancing Technologies to upgrade the existing grid should be prime choice instead of 400 kV HVAC OHL for long distance Electrical Transmission (ET). The consultations run by the TOs for the Pathway to 2030 infrastructure have presented a final design of OHL as a fait accompli with minor adjustments to the corridor being the only response to mass objections of those consulted. This is in complete breach of the Gunning principles. tCSNP2 has reached its current state of development with no public consultation of any kind, also in breach of Gunning Principles.

**Treasury Green Book**

We believe Ofgem, as a Government Body making funding decisions on massive public projects, should adhere to the Treasury Green Book and in particular require the ESO and TOs to provide properly costed options appraisals. To date the TOs have merely looked at the bare capital and operational costs of the project. They have not properly assessed other associated costs such as *“as valuation of risks to life and health”, socio-economic impact (farming, tourism, housing) or natural capital impact* required by the Green Book.

**Renewable Energy First Principle**

Putting giant wind farms on remote northern Scottish islands for export to central and southern UK and thus requiring massive ET infrastructure is engineering and economic madness. Likewise, subjecting the rural communities of the East of England and Wales to poorly thought through transmission infrastructure (for power used elsewhere) is being driven by investor profits, not as part of a holistic UK wide total energy. This rapid expansion of distant generation with the associated transmission costs running into billions of pounds seems contrary to Ofgem’s prime role in protecting the consumers’ interests.

**Transmission Operator(TO) oversight**

There appears to be no oversight of the project planning and development of current major TO projects until a planning application is submitted. No other industry in the UK, with mega public projects, has such a lax approach to accountability.

**Reducing development timetables**

Reducing the timeframe for concept to energising new networks is an absolute requirement. We agree. But riding roughshod over communities with unfair and unlawful consultation and derisory compensation schemes is not the way to achieve this. Consultation must adhere to the Gunning principles. Selecting less intrusive technologies such as greater use of HVDC both offshore and onshore would certainly help. Proper assessment of the real socio-economic and natural capital impacts must be taken into account.

We hope this input can lead to a proper inclusive approach to UK's path to Net Zero.

Yours sincerely