

Response ID ANON-8W5K-8TZ5-A

Submitted to Strategy and Policy Statement for Energy Policy in Great Britain
Submitted on 2023-06-15 13:08:45

About you

1 What is your name?

Name:
Rosie Pearson

2 What is your email address?

Email:
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3 What is your organisation?

Organisation:
Community Planning Alliance

4 We usually publish a summary of all responses, but sometimes we are asked to publish the individual responses too. Would you be happy for your response to be published in full?

Yes

5 How did you hear about this consultation?

How did you hear about this consultation?:
GOV.UK alert

Other (please specify):

The consultation questions

1 Does the strategy and policy statement identify the most important strategic priorities and policy outcomes for government in formulating policy for the energy sector in Great Britain? If not, please provide details of the priorities that you think should be included.

No

Please enter additional information here:

The strategy should ensure that the environment and communities are fully considered and included. This iteration of the strategy neglects the environment and communities, whereas the 2011 guidance did take them into account. The 2011 guidance on the environment and communities must be carried through in this new strategy and policy statement and in addition it must be updated to reflect more recent environmental legislation. Communities must be involved at the earliest stages of project consideration.

Consideration should be given to applying the four Design Objectives of the Holistic Network Design which are that an outcome should:

- i. be economic and efficient
- ii. be deliverable and operable
- iii. minimise the impact on the environment
- iv. minimise the impact on local communities.

Each of the four is given equal weight.

All over the country, bad projects are being foisted on communities too late in the day for them to shape a good outcome. The result is that action groups such as the following spring up to fight a proposal which is presented as a done deal, and the system becomes contentious. Just some of the groups having to fight contentious proposals are:

Essex Suffolk Norfolk Pylons
Suffolk Energy Action Solutions
Norfolk Parishes Movement
East Anglian Alliance of Amenity Groups
Say No to Anglesey Pylons
Bute Pylons Campaign
Llandoverly Pylons Action Community Group
Save our Mearns
Pylon Pressure to Stop SSEN
Communities B4 Power Companies
No to Galloway Pylons

Say No to Aquind

The Gunnings Principles of consultation must be embedded in policy and Treasury Green book project appraisal guidelines must be followed to ensure proper, robust assessment of alternatives, looking at non-monetary aspects using the tools provided so that natural capital and socio-economic impacts are properly assessed.

2 Does the strategy and policy statement effectively set out the role of Ofgem in supporting government to deliver its priorities? If not, please identify where these expectations could be made clearer.

No

Please enter additional information here:

There must be greater accountability at Ofgem, and, although the strategy and policy statement refer to the role of the SoS to oversee Ofgem, that needs to happen in practice.

There must be insistence of greater separation between Ofgem and transmission operators than we are currently seeing. Ofgem is a REGULATOR, not a delivery partner! The relationships with transmission operators are too close to allow for objective regulation by Ofgem.

Ofgem must be held to account if it does not insist that transmission operators (or anyone it oversees who is responsible for a project) adheres to the Treasury Green Book. Currently, Ofgem is not doing so (and has admitted as much to us several times) even though the Green Book is mandatory. Not only that, the Green Book would enable thorough and proper scrutiny of all the impacts of a proposal such that the non-monetary impacts could be quantified, as well as the monetary ones.

Ofgem must be held accountable to its duties which include the requirement to protect the interests of existing & future customers, to contribute to the achievement of sustainable development, to have regard to those living in rural areas, to secure a diverse and viable long-term energy supply. In East Anglia, Ofgem is failing against those particular duties because it will not insist upon the use of the Treasury Green book, in particular the guidelines around project appraisal and alternatives.

3 Given the FSO does not exist yet but will need to have regard to the strategy and policy statement once it does, do you consider that we have effectively reflected the FSO's role in this document? If not, please identify where these expectations could be made clearer.

No

Please enter additional information here:

The role is clear but we would simply re-iterate the importance of the Treasury Green Book. The new FSO must adhere to the Green Book, as must any body whose work is scrutinised by ESO