

## CSNP Consultation Survey: Electricity Network Planning

This consultation survey will be used to gather the views from stakeholders regarding the electricity network planning elements of CSNP methodology. This feedback will be considered and used to develop the final methodology released in September 2025.

**Please complete this consultation survey by 1 August at 5pm.** Following this date the consultation will be closed and you will no longer be able to submit a response through this form.

**Do you agree with the scope and framework, consisting of the options funnel and delivery pipeline, for electricity transmission network planning? (Page 47)**

Strongly agree

Agree

**Neutral**

Disagree

Strongly disagree

**Do you have any additional comments regarding the scope and framework for electricity planning in the CSNP?**

Historic England recognises and is supportive of the need for the strategic planning of the electricity transmission network. The proposed scope and framework, including the options funnel and delivery pipeline appear to provide a clear process. We note the commitment for the CSNP to consider impacts on the environment and communities.

Table 3 (pages 41 and 42) helpfully explains the strategic role of NESO in developing the CSNP and the role of delivery bodies in delivering it. This indicates much of the detailed design work e.g. route design and planning and consenting will be undertaken by the delivery bodies. Historic England welcomes early engagement with delivery bodies to ensure the historic environment has been fully considered in project development. This helps us to work with delivery bodies to identify solutions to issues impacting the historic environment early in the process thereby speeding up the process and potentially reducing costs.

Table 3 also shows that the CSNP for electricity will be subject to SEA, HRA and MCZ assessment, which is to be welcomed. The last point under the Detailed design by the delivery body column indicates that the CSNP will “not require on the ground surveys and project-level environmental assessments such as Environmental Impact

Assessment (EIA)". As noted above we acknowledge that an appraisal including environment considerations will be undertaken at the options funnel/delivery pipeline stage. Historic England is concerned this appraisal may not contain sufficient project level detail on the historic environment to negate the need for an EIA. Additionally, whilst the CSNP itself will not require on the ground surveys and project-level environmental assessments, such as EIA, these will be required as part of planning and consenting for individual projects relating to the plan.

We would welcome further clarification on this and seek reassurance heritage impacts will be understood and considered in whatever environmental assessment process is undertaken. This is of particular concern given that once in the pipeline reinforcements within the delivery pipeline are unlikely to be reassessed unless there are substantial changes.

**Do you agree with our approach to use both spatial and electrical coordination to develop offshore networks? (Page 66)**

Strongly agree

Agree

Disagree

Neutral

Strongly disagree

**Do you have any additional comments regarding spatial and electrical coordination of offshore networks?**

We support co-ordination when it may prevent the need for additional onshore reinforcements, thereby potentially minimising impacts on the historic environment.

**Do you agree with our plan to design using current cable standards to provide certainty for connections? (Page 66)**

Strongly agree

Agree

Neutral

Disagree

Strongly disagree

No comment

**Do you have any additional comments regarding using common cable standards for the CSNP?**

No comment

**Would it be helpful to see the indicative offshore design before the system requirements publication? (Page 78)**

Yes

No

**Do you have any additional comments regarding the offshore design process? (Page 78)**

It is important to recognise the scale of the cultural heritage resource in the marine environment. The CSNP must fully embrace the UK government position set out in the UK Marine Policy Statement (MPS) which recognises that heritage assets are not just sites or areas which have been designated, to quote MPS paragraph 2.6.6.5 “The absence of designation for such assets does not necessarily indicate lower significance and the marine plan authority should consider them subject to the same policy principles as designated heritage assets (including those outlined) based on information and advice from the relevant regulator and advisors.” All English Marine Plans are required to be in keeping with the MPS and so policies within these plans reflect this requirement. It is therefore recommended that attention is given to the potential significance of non-designated sites heritage assets as might be encountered within the UK Marine Area.

Seeing the indicative offshore design before the system requirements publication would be an important step and enable us to advise of any potential issues regarding the historic environment in both the marine and terrestrial environments before key decisions are made. Doing so will support the streamlining and speed up the delivery of electricity transmission infrastructure.

**Do you agree with the scope of analysis under the identify step? (Page 98)**

Disagree

Strongly agree

Agree

Neutral

Strongly disagree

No comment

**Do you have any additional comments regarding the scope of analysis under the identify step?**

No comment

**Do you have any feedback to improve the presentation of system requirements, as shown in the Identify chapter? (Page 98)**

No comment

**What information would be useful to enable you to submit an option in the Expression of Interest window? (Page 110)**

No comment

**How would you like that information to be communicated? (Page 110)**

No comment

**What additional support would you need to develop options? (Page 112)**

**Do you agree with the options development process and the required information? (Page 118)**

Strongly agree

Agree

Neutral

Disagree

Strongly disagree

**Do you have any questions regarding the options development process?**

Table 8 Filtering considerations (page 106). Historic England notes that under the Environment and community criteria, NESO will establish a constraints list to filter options through GIS. We would appreciate NESO's confirmation that historic environment constraints will be included in the list and welcome the opportunity to work with NESO to this effect.

**Are there any other elements that we should include within the economic assessment? (Page 123)**

No comment

**Do you agree with our approach regarding sensitivities? (Page 124)**

Strongly agree

Agree

Neutral

Disagree

Strongly disagree

**Are there any other specific sensitivities you think we should consider? (Page 124)**

It is unclear if environmental considerations, including the historic environment, are considered as part of the sensitivities. It would be helpful to make this more explicit.

**Do you agree with the proposed scoring approach for environmental and community? (Page 129)**

Strongly agree

Agree

Neutral

Disagree

Strongly disagree

NB. There is no opportunity to qualify this answer, hence awarding a neutral response (a response is required to this question)

**Do you agree with the proposed flag system to highlight when an individual indicator within an impact category has reached the maximum score? (Page 130)**

Strongly agree

Agree

Neutral

Disagree

Strongly disagree

**Do you have any additional comments on the proposed flag system?**

In principle Historic England considers the proposed flag system to be appropriate, however much will depend on the data/evidence that underpins the scoring. For example, it will be crucial that Table 12 Proposed environmental and community impact categories with potential example of indicators (page 129), provides robust sub-criteria and potential examples of indicators. We acknowledge the explanation that the table in its current format is not exhaustive (e.g. there is no reference to protected wreck sites) and will be finalised through the CSNP governance forum. We look forward to feeding into this forum via the Environment Working Group. Alternatively, we would be pleased to meet with NESO regarding the historic environment aspects.

We welcome the inclusion of quantitative data supplemented with a 'substantial' qualitative narrative (page 131) as we believe this has the potential to highlight the nuances associated with the heritage assets, both terrestrial and marine.

**Do you agree with the deliverability and operability sub-criteria listed and their scoring characteristics (Appendix C2 and C3)? (Page 137)**

Strongly agree

Agree

Neutral

Disagree

Strongly disagree

**Are there any new criteria you believe should be included, or any existing criteria that you think could be removed? (Page 137)**

No comment

**Do you have any additional comments regarding the deliverability and operability sub-criteria and their scoring characteristics?**

No comment

**Do you agree with our approach to the GB design decision-making framework? (Page 143)**

Strongly agree

Agree

Neutral

Disagree

Strongly disagree

**Do you have any additional comments on the GB decision-making framework?**

No comment

**Do you agree with the approach to progressing required reinforcements into the delivery pipeline? (Page 156)**

Strongly disagree

Disagree

Neutral

Agree

Strongly agree

**Do you have any additional comments regarding the approach to processing required reinforcements into the delivery pipeline? (Page 157)**

Options selection (Page 151) explains how the delivery body will select the final option and progress through to the detailed design and delivery stages. We wish to reiterate our concern (as highlighted in our response to the question of scope and framework of the CSNP) that the CSNP appears to propose at Table 3 (pages 41 and 42) that no EIA will be required at the project level. We seek urgent clarification from NESO on this point.

**Do you agree with the change control process?**

Disagree

Strongly agree

Agree

Neutral

Strongly Disagree

**Do you have any additional comments on the change control process? (Page 157)**

No comment

**Thank you for completing the survey. Are there any additional comments you would like to share?**