CSNP Consultation Survey: Gas Network Planning

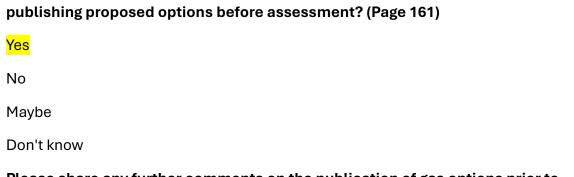
This consultation survey will be used to gather the views from stakeholders regarding the gas network planning elements of CSNP methodology. This feedback will be considered and used to develop the final methodology released in September 2025.

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.

Are there any additional processes or analyses you believe should be considered in gas network planning? (Page 160)

No comment

Should gas network planning align with electricity and hydrogen planning by



Please share any further comments on the publication of gas options prior to assessment.

No comment

Do you agree with our approach to base gas planning activities within the CSNP on needs from the SSEP, supplemented by FES net zero pathways and the **Counterfactual? (Page 163)**

Strongly agree

Agree

Neutral

Disagree

Strongly disagree

Do you have any further comments on our proposed approach to planning based on SSEP and FES counterfactual data?

No comment

Do you agree with using the GNCNR methodology for CSNP system requirements analysis in gas transmission network planning? (Page 176)
Strongly agree
Agree
Neutral Neutral
Disagree
Strongly disagree
Please provide any additional comments on using the GNCNR methodology for CSNP system requirements.
No comment
Do you agree with using the GOA methodology for CSNP options development in gas transmission network planning? (Page 178)
Strongly agree
Agree
Neutral Neutral
Disagree
Strongly disagree
Do you have any further comments on using the GOA methodology for CSNP options development?
No comment
Do you agree with using the current GOA methodology for the 2027 CSNP, or should there be another consultation for the next GOA cycle? (Page 179)
Strongly agree
Agree
Neutral Neutral
Disagree

Strongly disagree

Do you agree with using the GOA methodology for carrying out the CSNP options assessment for planning of the gas transmission network? (Page 183)

Strongly agree

Agree

Neutral

Disagree

Strongly disagree

Do you have any further comments on using the GOA methodology for CSNP options assessment?

The description of environmental impacts in Table 21 In-scope criteria to be included in the GOA assessment (page 182) is the "Environmental cost of emissions that are incurred as part of an investment option". This description appears to focus only on emissions and excludes other environmental impacts, including those on the historic environment. We recommend that this description be widened to include other environmental impacts.

Any further comments on using the current GOA methodology for the 2027 CSNP?

No comment

Are there other elements of social impact we should consider in gas network planning? (Page 187)

Historic England is concerned that NESO does not propose to extend the SEA of the CSNP to the gas network section. In addition, as highlighted elsewhere in this response, we are concerned that only emissions will be included in NESO's environmental assessment. SEA is crucial because it integrates environmental considerations into the development of plans, programs, and strategies, promoting sustainable development and better environmental protection and outcomes. By systematically assessing potential environmental effects early on, SEA helps avoid costly environmental damage, streamlines decision-making, and enhances public engagement. Therefore, using SEA for only certain parts of the CSNP's activities, and including only certain environmental triggers e.g. emissions, may result in poor development outcomes, risks conflicts with other plans, policies, and legislation, and increases delays further along the process.

We are also concerned regarding the following paragraph on pages 187-188, "As noted above in the Deliverability section, we will also consider how known features in the geographical area of proposed assets may create challenges for the implementation of the option, and this consideration will take account of environmental factors such as Areas of Outstanding Natural Beauty (AONBs), Site of Special Scientific Interest (SSSI), and larger protected habitats that could pose a significant restriction on siting or routeing of assets".

This paragraph and the accompanying Table 22 Deliverability framework (page 186) only refer to AONB's (now known as National Landscapes), SSSI's and larger protected habitats. There is no consideration of the historic environment or heritage assets. Historic England recommends NESO urgently review this section to include wider environmental considerations. We would be pleased to advise on the historic environment.