**Pro-forma response to NESO’s draft Electricity Transmission Design Principles.**

1. **Do you agree the Principles are written in a clear and accessible manner?**

* We would draw a clearer distinction between the Principles aligning with policy to help streamline delivery but not themselves accelerating build. Accompanying planning reforms, such as the Planning & Infrastructure Bill, with stronger, legislative power will be the driving force behind tangible acceleration.
* In order to better communicate the purpose of the ETDP, more explicit explanation on how the Principles differ from existing arrangements (Holford and Horlock rules, National Policy Statement EN-5, NPF4) would be welcomed. Furthermore, at present it is unclear whether these new Principles usurp the existing ones or are to both be considered. Clear understanding of these two points will be key to communicating with local communities.

1. **Given the context of the mission statement, are there any guidelines for transmission design that you think are missing?**
2. **Which Principles do you support and which do you disagree with and why?**

* The Principles are currently intended to be applied to new transmission infrastructure projects from January 2026. However, it would be more appropriate to align the new design guidance with the outcomes of Connections Reform and subsequent strategic plans, such as the Strategic Spatial Energy Plan (SSEP) and Centralised Strategic Network Plans (CSNP) being delivered in 2026 and 2027 respectively.
* We would also encourage the Principles to be extended to cover distribution projects for greater alignment, for example, if the Principles affirm that 33kv should be undergrounded, there will be no justification as to why this is not also applied consistently for distribution.
* Please find comments related to specific Principles below:
  + Strategic Principles
    - SP1: Technical needs– we welcome efforts to minimise recurring updates within planning horizons but the data inputting into connections needs to be sound for this to be achieved, i.e., data informing the SSEP.
    - SP3: Economics and regulation– in order to promote economic efficiency and coordinated infrastructure, we first need more consistency across the TOs in terms of what design alternatives they are open to, TOs need to assume the responsibility of coordinating the sharing of infrastructure with their oversight of all network connections.
  + Network Planning Principles
    - Route Assets –
      * T1: again, the credibility of data informing the SSEP greatly influences this Principle. Reform projects with protections 3a & 3b need to be considered in future development needs, but are not currently being considered in network design by NESO or TOs. The failure to recognise these risks the design of a network that must be soon after amended, incurring additional delays and costs.
      * T2: if presumptions are not consistent across England, Wales and Scotland, local communities will make challenges.
    - Substations –
      * S1: requirements when considering substation designs are numerous and complex, and the Principle here does not provide any guidance on the priority order in terms of importance of consideration. Furthermore, policies across TOs need to be more consistent. A pertinent example of this is TO sentiment towards developers siting projects close to substations or network-infrastructure for various advantageous reasons including cost.
      * S2: the Principles states that the substation layout must include sufficient space from the conception. Further clarification here
      * S3: this Principle refers to anticipated future network but we would argue that this should all be derived from the forthcoming SSEP/CSNP.
    - Project Development – Overhead Lines
      * T3
      * T7: similar to points raised above, TOs have inconsistent approaches to indoor/outdoor infrastructure which should be harmonised to avoid community opposition. Furthermore, the cost of placing infrastructure indoor should be more closely considered against the value it delivers.
    - Project Development – Underground Cables
      * U1: similarly to the need for TOs to assume greater responsibility of coordinating shared infrastructure, does the sharing of underground trenches need to be considered to avoid issues seen in the offshore space?
    - Project Development – Substations
      * In general, this principles does not provide any clarity or direction on design considerations. AIS versus GIS needs a lot more analysis in terms of supply chain availability.

1. **Do the Principles promote transparency in decision-making about new transmission projects?**

* While the principles are designed as a public facing document, offering an insight into decisions around transmission projects, it is proven that communities themselves understand the reality of projects only when network operators consult in their area. The Principles, however, affect design determined by NESO that starts much earlier in the process, ahead of TO build and unaccompanied at present by any public consultation.
* We would strongly urge NESO to expand its efforts before the stage of TO routing options to inform communities not only of potential incoming infrastructure but the broader intention of strategic energy planning in the UK and its role. As SR has long advocated, the roles and responsibilities surrounding strategic buildout need to be more clearly defined to involve key decision-makers, such as NESO and DESNZ, in the on-the-ground conversation with the public,

1. **Are the Principles realistic and actionable for designers and users of Principles?**
2. **Do you have any further comments on the Electricity Transmission Design Principles?**

* The Principles do not currently contain any information on contestability or the option of connecting directly into transmission. Contestability at transmission level needs to be more closely considered as TO costs escalate and risk jeopardising projects.
* There is some concern that due to the Principles being guided by ‘practical professional experience of transmission design by NESO & TOs’, there will be less scope for challenge, which could stem subjectivity.