

**From:** [SEAS](#)  
**To:** [East Anglia ONE North](#); [East Anglia Two](#)  
**Subject:** SEAS Response to the Preliminary Meeting  
**Date:** 28 September 2020 17:47:39

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Dear Mr Smith,

## Yes to Wind Energy, Let's Do It Right

Suffolk Energy Action Solutions (SEAS) is a keen advocate of offshore wind energy and many of our supporters have observed with interest the Preliminary Meeting of 16th September 2020. We would like to make the following written response with regard to Preliminary Matters for your consideration.

Most importantly, Sir, we would like to bring to the fore the issue of the BEIS Review. We welcome your comment on this saying that you would "*give careful consideration*" to the proposal that the examination be paused until the report of the BEIS review is available.

As Richard Turney points out, the Review brings EA1N and EA2 into its scope because it includes, in the medium-term work stream, those projects which will connect to the onshore network after 2025. In order for these projects to truly benefit from this Review, the examination process needs to be postponed until such time as BEIS has provided "*clarity for an enduring approach in 2021*", [BEIS Offshore Transmission Network Review Terms of Reference](#). It would be foolish to even start these examinations prior to hearing the recommendations and proposals from this important Review. Therefore we would like to add my weight to Barrister Richard Turney and Councillor Marianne Fellowes and call for a halt to the examination process for EA1N Offshore Wind Farm and EA2 Offshore Wind Farm until such time as the BEIS Review has been completed.

We would like to take this opportunity to respond to the Applicant's comments on the BEIS Review. When speaking about an integrated offshore connection, they quote National Grid's report of 2015 [Integrated Offshore Transmission Project East](#) stating, "*as a result the project team does not believe it would be economic and efficient to progress with the development of an integrated design philosophy or delivery of anticipatory assets at this time.*" But, as the BEIS Review Terms of Reference state, integrated offshore connections are not just about the economic cost, they are about finding "*the appropriate balance between environmental, social and economic costs*". What the Applicant fails to quote is that this exact report also says, "***the technology required to deliver integrated offshore networks is in development and can reasonably be expected to be available, at the ratings required, by around 2020.***" As National Grid states in their latest 2020 report, [Unlocking Offshore Wind, Why a New Generation of Interconnector Holds the Key](#). "*Combined assets make economic and environmental sense. They have the power to connect offshore wind more quickly and cheaply, and they place a lower burden on communities*". The report goes on to say, "*to meet the Government's Net Zero target by 2050, we need to maximise connections.*"

All the main players now acknowledge the need for an integrated approach to grid connections. As the Chairman of the Environmental Audit Committee wrote in a [letter to the Minister of State, Rt Hon Kwasi Kwarteng](#), "***The current approach,***

***where each individual developer is provided with a connection offer (for which they pay fees to National Grid), independent of possible future developments, is no longer fit for purpose and causes unnecessary damage to coastal habitats."*** As the [Ofgem Decarbonisation Programme Action Plan](#) states, "***We do not consider that individual radial offshore transmission links for ... offshore generation are likely to be economical, sensible or acceptable for consumers and local communities"***". As Crown Estate has said "as managers of the seabed around England, Wales and N Ireland, we recognise the need for a more coordinated approach to the transmission system, both offshore and onshore and are committed to working with Government and other strategic partners to help ensure the sustainable and responsible development of our nationally important wind resources...". This view is even held within the industry's private sector, as SSE Renewables argue in their paper, [Delivering 40 GW of Offshore Wind in the UK by 2030](#), "***The 'point to point' approach to the development of grid infrastructure under the current offshore transmission owner arrangements will not be fit for purpose for delivering 40GW of offshore wind by 2030. It is not an efficient approach to grid planning; will add unnecessary cost and could present local acceptance problems for onshore connections in areas that already have higher density of network infrastructure"***". We could go on ...

In the Preliminary Meeting, the Applicant talked of the difficult "regulatory change" necessary if a more integrated offshore approach is to be taken. But BEIS has already stated in its Review Terms of Reference that it will seek to explore opportunities for "***regulatory flexibility***" within its medium-term work stream. This Review will provide the desperately needed strategic leadership and financial and regulatory framework required for the Applicant to provide a sensible integrated offshore solution which is sensitive to our environment and communities. Is it not more important that we listen to the lessons of this Review first and get this right for the medium and long term?

Sir, to conclude, it is not enough to "***keep an eye on that (the Review) like everybody else***", as stated by Examining Inspector Caroline Jones, whilst the Examination proceeds unabated. The Examining Authority should recommend to the Secretary of State that the Examination Process for EA1N and EA2 should not proceed until the Review in 2021 has been concluded.

We thank you for your consideration.

Kind regards

The SEAS Team

Yes to Wind Energy  
Let's Do It Right

**From:** [SEAS](#)  
**To:** [East Anglia Two](#); [East Anglia ONE North](#)  
**Subject:** SEAS Response to the Preliminary Meeting - Virtual Hearings  
**Date:** 29 September 2020 12:15:17

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Dear Mr Smith

### *Yes to Offshore Wind Energy, Let's Do It Right*

As an Interested Party, Suffolk Energy Action Solutions (SEAS) would like to make a further written representation concerning the procedural issue of physical vs virtual Hearings, as raised in the Preliminary Meetings on 16th September 2020.

We were pleased to hear the Examining Authority acknowledge that many Interested Parties have requested that the forthcoming meetings and Hearings should not be held virtually but rather deferred until traditional physical Hearings can occur. Indeed, we welcome your comment that, *"it remains our very strong desire to hold physical hearings if we can"*. We would also like to welcome the Applicant's 'hybrid' approach with the suggestion that physical Hearings are held at Snape Maltings particularly for those who find the technology necessary for virtual Hearings impossible or challenging. In this way, with Hearings genuinely open to all interested parties, regardless of technological ability or availability, a fair and participatory examination can be undertaken.

It is then alarming that the Examining Authority intends to retain the Open Floor Hearings on 7th, 8th and 9th October as a virtual only event. As you yourself said, these Open Floor Hearings are targeted at individuals (rather than organisations who might be better heard at the Issue Specific Hearings). It is these very individuals who, as we have heard from SASES Barrister Richard Turney, Councillor Marianne Fellowes and Mr and Mrs Courage, are the most likely to struggle to operate the technology associated with remote Hearings. In the interests of fairness and justice, all Interested Parties must be able to contribute if they so wish and the only way to guarantee this is for every Hearing, including the initial Open Floor Hearings, to have a physical option.

Sir, you requested that we address the issue of the Ministerial Statement of 13th May 2020 which sets out the expectations of how the planning system should operate in the COVID 19 pandemic. This states that whilst virtual arrangement should be the default method of operation, ***"the Government recognises that in exceptional circumstances it may not be fair to proceed virtually and that alternative arrangements may be needed. These alternative arrangements should be taken forward speedily, where possible, taking into account the Government's guidance on social distancing"***. With technological difficulties already established, it would indeed be unfair to proceed virtually. If it is not possible for the Applicant to provide a physical space for ALL Hearings and enable ALL individuals to proactively engage with the planning process, then the Examination should be postponed until such time as they can. The pursuit of fairness and justice must be sacrosanct.

You also draw our attention to the latest 'new normal' - the 'rule of 6'. As we are sure you are aware, the rule of 6 does not apply to venues such as Snape

Maltings, which under current government guidance can accommodate 150 people, socially distanced. They have a rigid [risk assessment](#) in place. Therefore there is no reason, under current government guidance why socially distanced physical Open Floor Hearings, or any future Hearings, can't occur at Snape Maltings.

This brings me onto the point of the fluidity of government guidelines which was stated at the Preliminary Meetings as the principal reason for retaining virtual events so as to negate any unexpected delay. Whilst the delay caused by any change in government guidelines is regrettable, virtual Hearings cannot be used as an unjust 'safety net' to simply bring these Hearings to a conclusion within the allotted time frame.

Finally Sir, you refer us to the case of Tingey and the Secretary of State for Housing Communities and Local Government and Horsham District Council. We would suggest that there is no comparison between Mr Tingey's case and over 800 individuals and organisations. Whilst technological arrangement could in the case of Tingey be put in place for one party so that a virtual Hearing could lawfully take place, it would be impossible to guarantee such arrangements for the large numbers of Interested Parties for EA1N and EA2. Thus we would respectfully suggest that to hold a virtual only event would be unlawful.

To conclude. SEAS believe, on the grounds of fairness and in the interests of justice, that remote only hearings must be ruled out. Unless the Examining Authority can guarantee that all Hearings can be held physically for the digitally challenged then this Examination must be postponed until such time as this can happen.

Thank you for your consideration.

Sincerely

The SEAS Team

Yes to Offshore Wind Energy  
Let's Do It Right