



Offshore Wind Farms
EAST ANGLIA ONE NORTH

PINS Ref: EN010077

and

EAST ANGLIA TWO

PINS Ref: EN010078

**SEAS responses to the applicants comments ([REP9-014](#)) on
SEAS Deadline 8 Submission ([REP8-235](#))
The Changing Policy Environment
Deadline 11 – 7 June 2021
by**

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1. To clarify the comments below are made on the Applicants Responses ([REP9-014](#)) submitted at Deadline 9 to SEAS Deadline 8 Submission ([REP8-235](#))
2. We have not sought to repeat the content of our submissions made at deadline 8 ([REP8-235](#)) on this topic. We maintain the position set out in this submission.

Applicants Comments (REP9-014) to SEAS Deadline 8 Submission (REP8-235), The Changing Policy Environment	SEAS Deadline 11 Submission The Changing Policy Environment
<p>10. SEAS has been consistent in their opposition to the Applications. A key part of its argument was initially that the Applications should be delayed and the new 'split decision' argument is a refinement of that argument. It is claimed that delay could allow different grid connection options to be identified.</p>	<p>This is incorrect. SEAS is in favour of offshore wind and has been consistent only in its opposition to the ONSHORE aspects of these Applications.</p> <p>The Applicant has misinterpreted SEAS proposal. A 'split decision' is not proposed as 'opposition to the Applications', it is proposed as a way forward as a positive solution which enables the offshore turbines to be constructed as planned and therefore causes no delay to the government's role out of its 2030 offshore wind targets.</p> <p>It would indeed enable an alternative grid connection to be identified IN LINE WITH the government's emerging environmental and wind energy policy by ensuring that</p>



	<p>the onshore infrastructure minimises its environmental and community damage.</p> <p>Alternative Grid Connections</p> <p>The applicant claims that there is no feasible grid alternative that is likely to emerge within the lifetime of the consents.</p> <p>Outlined In Therese Coffey's Deadline 10 submission (REP10-070) are two alternative grid connection locations, Bradwell and Bramford. If one adds to this GRAIN, which is closer to the centres of population where the energy is needed and the 'unnamed' connection offered to North Falls offshore wind farm then there are several potential connection points. None of these compare to Friston, a village in the midst of Suffolk's iconic nature based tourist destinations and surrounded by unspoilt countryside with no prior industrialisation.</p>
<p>11. There is no policy for support for this position. The Energy White Paper acknowledges that the enduring regime will not be in place until 2030 and National Grid ESO and others have identified that it will be reliant on technology advances and a complete re-write of the legal and regulatory framework. This will require legislation and significant consultation. The Office of Gas and Electricity Markets (OFGEM) has appeared at the Examination and given their opinion on the likely timescales.</p>	<p>Government Policy</p> <p>To say there is "<i>no policy for support for this position</i>" is nonsense. SEAS Deadline 8 Submission on this matter (REP8-235) shows that there is SIGNIFICANT POLICY SUPPORT for this position within the Executive, the Legislative and the Judicial arms of government.</p> <p>Therese Coffey MP herself quotes from this submission:</p> <p><i>"The pressing need for renewable energy does not justify the failure to consider the government's environmental policy. This consistent directive is now echoed within the Executive, the Legislative and the Judicial arms of government. The onshore aspects of these projects, as they currently stand, fly in the face of the Prime Minister's 10 Point Plan, the Prime Minister's response to Duncan Baker, the BEIS Review, the Government Energy White Paper, the Dasgupta Review and nearly every report written on Network Transmission in the last 10 years. It is now irrational to say that the policy environment is not one of greater offshore coordination to protect our environment."</i></p>



Further evidence of this policy position came last week on May 19 2021 at Prime Minister's Questions when the PM confirmed his support for an offshore grid after James Cartlidge (MP South Suffolk) asked him the following question:

"I thank the Prime Minister for the support he has already shown for coming forward with an offshore transmission grid, which he knows will help us to both export our surplus offshore wind to the continent and reduce the infrastructure associated with new wind farm capacity. It is very important to our communities, but there is a question over timing. Given that he has already set out an ambitious and clear timetable for increasing offshore wind generation, will he now come out with an equally ambitious timetable for delivering an offshore grid?"

The Prime Minister's response:

"My hon. Friend is spot on in what he says about the need for an offshore grid. As well as building the fantastic windmills, it is vital that we bring the energy onshore in a way that has minimal disruption for local communities and enables us to maximise efficiency." [Hansard](#)

This response shows backing at the highest level for a grid connection which has **'minimal disruption for local communities'** and grid connections which **'maximises efficiency'**.

As Therese Coffey said in her Deadline 10 Submission ([REP10-070](#)) with regard to **'maximising efficiency'**:

"The long-term capacity of Bradwell as an integrated Wind Energy Hub has significantly greater potential than the Friston site. It is closer to London and on the coast thus negating the need for cable corridors to be dug and re-dug with every future wind farm project attempting to connect to the Grid. It is a brownfield site and in need of development. Whilst the overhead pylon lines will need upgrading and



reinforcing at some cost, there will in turn be cost savings from using fewer trenches and cables. Furthermore the cost benefits from integration have been documented in NGESO's Offshore Coordination Phase 1 Final Report which says that:

'Adopting an integrated approach for all offshore projects to be delivered from 2025 has the potential to save consumers approximately £6 billion, or 18 per cent, in capital and operating expenditure between now and 2050.'"

The BEIS Review

The Applicant goes on to comment that,

"The Energy White Paper acknowledges that the enduring regime will not be in place until 2030 and National Grid ESO and others have identified that it will be reliant on technology advances and a complete re-write of the legal and regulatory framework. This will require legislation and significant consultation."

The Applicants refusal to engage with the BEIS Review is concerning. Their justification that EA1N and EA2 are to be built out too soon to engage with the 'enduring regime' detracts from what they can achieve. As Therese Coffey MP points out in her Deadline 10 Submission, the 'enduring regime' is not all that the BEIS Review is about:

"The BEIS Review is phased. Stakeholders have been requested by BEIS to come forward with proposals for 'Pathfinder' projects capable of early implementation. In the case of EA1N and EA2, these two projects can share the same technology, share the same developer (which quite possibly would negate the need for changes to legislation) and therefore have opportunities to integrate within the existing regime and to engage with the BEIS Review as a 'Pathfinder' project or similar."

As SASES state:

"SPR is well placed to integrate these projects and reduce the harm to the environment. This does not require a ring main or shared assets but runs with the government's energy policy. It enables an alternative grid location to be brought



forward with less damaging impacts on our environment and coastal communities in line with the White Paper and BEIS Review.”

Please see response to point 15 below.

The Applicant’s failure to work with BEIS and Ofgem to explore some kind of offshore transmission structure is unreasonable given the significant harm that would be suffered as a result of the proposed on-shore development.

Technology Advances

The Applicant comments that the “enduring regime will be reliant on technology advances”. The Applicant has consistently stated that HVDC is not available technology for wind farm connections. Yet, EA3 will be using HVDC connections. Most recently, Dogger Bank wind farm has announced a 1.2GW HVDC offshore substation to be installed in 2023. This technology “*is also expected to save hundreds of millions of pounds and could be used in future HVDC projects of a similar transmission capacity*”. [OffshoreWind.biz May 4 2021](#).

OFGEM

The Applicant notes that “*the Office of Gas and Electricity Markets (OFGEM) has appeared at the Examination and given their opinion on the likely timescales.*” However, what they fail to mention is that OFGEM, at Issue Specific Hearing 2, Session 2 also gave their opinion on SASES Pathfinder projects:

Chris Wheeler, SASES [Issue Specific Hearing 2, Session 2, December 2 2020](#)

“That if ScottishPower were willing, they could coordinate their EA1N and EA2 wind farms, and delivery the power from those two wind farms together to a single site using HVDC, rather than using HVAC, this would facilitate a connection to a site,



	<p><i>which was far distant from the pristine site that is currently being considered. And what I would like to do is for the Ofgem representative to comment on whether or not ScottishPower, bearing in mind they have control over both projects, were willing to do that whether the current regime could support them in doing so”</i></p> <p>Ofgem</p> <p><i>“Indeed, with regard to the comment from Mr. Wheeler, there is scope for the development of shared assets and this can be considered within the existing regime...”</i></p>
<p>12. This all demonstrates the futility of the split decision. It achieves nothing. It would not stimulate the supply chain, the Projects could not bid into auction rounds and there is no feasible grid alternative that is likely to emerge within the lifetime of the consents.</p>	<p>Split Decision</p> <p>Triton Knoll, where the offshore consent was granted in 2013 and amended to allow onshore connection in 2016 set a precedent for a ‘split decision’. This wind farm is now under construction. The ‘split decision’ path followed here certainly did not, <i>‘achieve nothing’</i>.</p> <p>It is quite possible, given the delays to the Examination, that even if this Application is consented in full it may well miss the CfD to be held later this year. If this is the case, it may be late 2023/24 before the Applicant has an opportunity to bid in a CfD.</p> <p>In the same time period, a split decision would give the Applicant time to submit an alternative proposal with a grid connection designed to cherish our environment and also ‘maximise efficiency’.</p> <p>BEIS secretary Kwasi Kwarteng has recently stated that he is “<i>working very closely with colleagues to see if we can quicken it</i> [the consenting process],” Renews.biz 22</p>



	<p>April 2020</p> <p>Viewed in this way, no time would be wasted.</p>
<p>13. The Energy White Paper (HM Government, 2020) policy is to deliver 40 gigawatts (GW) of offshore wind, not consent it. The key passages of the Energy White Paper cannot be ignored. The need and the urgency could not be more clearly stated (pages 38 and 45). There has been an intensification of the need for the delivery of large volumes of offshore wind capacity. Effectively what SEAS are looking for is an embargo on new development until the delivery of a future ring main. This runs counter the Government's energy policy.</p>	<p>The Applicant has misinterpreted SEAS comments. We are in favour of offshore wind and are certainly not looking for an embargo on new development until the delivery of a future ring main. Indeed we do not even mention or infer a ring main in this submission.</p> <p>With regard to the need and urgency of offshore wind. Again I would refer the Applicant to Therese Coffey's Deadline 10 Submission in which quotes,</p> <p><i>"The pressing need for renewable energy does not justify the failure to consider the government's environmental policy..."</i></p> <p>Please see the response to point 12 with regard to timing and the Split Decision.</p> <p>Please see the response to point 11 - with regard to the Government Policy</p>
<p>14. Further documents have been published. In January 2021 National Grid ESO published an updated Network Options Assessment. A copy is attached as <i>Appendix 1</i> to this response. This has looked at possible offshore reinforcement options which could be delivered towards the end of</p>	<p>The conceptual link that the Applicant is referring to is from Hornsea to the East Anglian wind farms.</p> <p>By its own admission the NOA's remit is very narrow and this conceptual link was tested solely against constraint reductions. As a result, the link from Hornsea to East Anglia was found to be not viable as it doesn't provide additional boundary capacity.</p>



<p>the decade (see pages 63 to 70). This included a link to East Anglia. This option evaluation confirmed that this link would not be viable.</p>	<p>It is our opinion that if a conceptual link had been proposed from the East Anglia windfarms, south, towards the centres of demand then the outcome of this test would have been completely different.</p> <p>“In addition these studies do not consider fewer landings, less environmental impact or asset expense savings that are likely to strengthen the case for an integrated network.” Network Options Assessment 2021</p>
<p>15. In addition, in March 2021 the Onshore Transmission Network Review project issued an update (<i>Appendix 2</i> to this response). This confirms on page 3 that the existing industry arrangements are continuing to apply and that there are ongoing workstreams looking at pathfinder opportunities. It is clear that the ‘new approach’ is aimed at less advanced projects and references Round 4 (currently undergoing Habitat Regulations Assessment (HRA)) and Scotwind which is due have bids submitted later in 2021. These are projects which are likely to be delivered towards the end of the decade.</p>	<p>The reference to Round 4 projects in the March 2021 OTNR update is a reference to projects in the ‘<i>Pathway to 2030 workstream</i>’.</p> <p>This is not the most immediate of the BEIS OTNR Workstreams and not the workstream that SEAS is referring to.</p> <p>The Early Opportunities workstream “<i>will look at projects that are already in relatively advanced stages of development and consider whether there are flexibilities or minor changes to regulations that could allow them to take a more coordinated approach under the current regime</i>”. BEIS and Ofgem joint response to the Open Letter engagement 17th December 2020</p> <p>The Newsletter update states</p> <p>“The Early Opportunities workstream aims to facilitate coordination for in-flight projects by making changes within the current overall regulatory framework”</p> <p>“BEIS and Ofgem encourage all developers of inflight projects at an appropriate state, who have yet to explore the options for coordination with us, to get in touch to ensure we capitalise on as many early opportunities for coordination as possible.”</p> <p>SEAS believe that SPR are well placed to integrate but this doesn’t require a ring</p>



	<p>main or shared assets or even a change to the existing regime (see comment Re: OFGEM, point 11 above) but would enable an alternative grid location to be brought forward with less damaging impacts on our environment and coastal communities in line with the White Paper and BEIS Review.</p>
<p>16. The updated information supports the evidence that has been submitted by the Applicants on this topic. The information is also consistent with the previous evidence provided by OFGEM (<i>Response to ExA's Further Written Questions 16 December 2020</i> (REP4-096)) and National Grid ESO.</p>	<p>The Applicant by focusing on an offshore ring main and the 'enduring regime' date of 2030 has effectively tried to exclude themselves from the BEIS Review and emerging government policy.</p> <p>In order for the Applicant's proposals to adhere to emerging government policy of greater offshore coordination to protect our environment, then the onshore aspects of these projects must be rejected in favour of a grid connection which offers the capacity to integrate multiple projects without having a devastating impact on local communities and their environments.</p> <p>A split decision is an opportunity.</p> <ol style="list-style-type: none"> 1. An opportunity to deliver quickly and avoid a lengthy and costly Judicial Review process for East Anglia One North and East Anglia Two as has been experienced in Norfolk. 2. An opportunity to choose a Grid connection which has the long-term capacity to act as a wind energy hub. 3. And finally an opportunity for future wind farm projects off the coast of East Anglia to connect to the grid and accelerate the government's wind energy targets.