

From: [SEAS](#)
To: [East Anglia ONE North](#); [East Anglia Two](#)
Subject: SEAS Response to the Preliminary Meeting
Date: 28 September 2020 17:47:40

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

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