



## Offshore Wind Farms

# EAST ANGLIA ONE NORTH

PINS Ref: EN010077

and

# EAST ANGLIA TWO

PINS Ref: EN010078

## **NEW EVIDENCE - SEAS response to 'NGESO's Response to CAH1' and NEGESO's "Offshore Coordination Phase 1 Final Report"**

### **Deadline 4 – 13 January 2021**

**SEAS (Suffolk Energy Action Solutions)**

**Unique Ref. No. EA1(N): 2002 4494**

**Unique Ref. No. EA2: 2002 4496**



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# DEADLINE 4 SUBMISSION

## NEW EVIDENCE - SEAS response to 'NGESO's Response to CAH1' and NGEESO's Report "Offshore Coordination Phase 1 Final Report"

SEAS would like to respond to [NGESO's Responses to Compulsory Acquisition Hearing 1 \(CAHs1\)](#) and bring [NGESO's Report of 16 December 2020 "Offshore Coordination Phase 1 Final Report"](#) to the attention of this Examination.

The NGEESO Report of 16 December 2020 ["Offshore Coordination Phase 1 Final Report"](#) on the costs and benefits of a more coordinated approach of connecting offshore electricity infrastructure throws considerable light on the Examination of EA1N and EA2. We are continuing to assess the contents of this report and will give further analysis at the next Deadline. We are setting out here for the Examiners initial findings, relating to the DCO in question.

1. This report, with its commitment to integration, adds further evidence to the now commonly held belief that Friston, the landfall site at Thorpeness and the route of the 9 km cable corridor, is being targeted for future energy projects in the area should this current Application be consented. Without the full raft of projects widely believed to be connecting to the grid at Friston being included within SPR's Cumulative Impact Assessment and indeed in all aspects of the Examination, a full and proper Examination has become impossible.
2. This report emphasises the importance of HVDC technology. "The majority of the technology required for the integrated design is available now or will be by 2030. However, a key component to release the full benefits of an integrated solution are high voltage direct current (HVDC) circuit breakers. A targeted innovation strategy in the UK, along with support for early commercial use, could help progress HVDC circuit breakers to commercial use and establish Great Britain as a world leader in offshore grids." If this HVDC technology was

used to bring the power from EA1N and EA2 ashore it would greatly increase the possibilities for site selection, quite possibly change the outcome of the CION process and enable the power to go to a pre-industrialised or brownfield site.

3. The report highlights the need for all parties "to work collaboratively and at pace .... with least impact on communities and the environment." Yet this Examination has seen an extraordinary lack of collaboration from community consultation to the current inability of NGESO or NGET to come to any Hearings. Without a full understanding and scrutiny of NGESO's plans this Examination becomes somewhat meaningless and inadequate.
4. This report adds weight to the BEIS Review in its reference to striking a balance between cost and also environmental and social benefits of future offshore wind farms. There is a dissonance between these objectives and the current plans for Friston. NGESO need to walk the talk and demonstrate through actions their own espoused "innovative and flexible approach" to delivering green energy in the right way.
5. The report "encourages projects delivering before then (2030) to consider the opportunities for coordination. It invites developers to take a 'voluntary' opt in approach (to integration). SEAS would like to ask SPR and NG why they would not take such an approach. If the incentives are not there, will BEIS address this barrier?
6. Delivering the extent of integration proposed within this report risks meeting the target of 40GW offshore wind. This risk seems to be given much greater weight than the risk to local communities and the environment.
7. This report, on page 17 talks about an integrated approach for the future which "takes account of possible future requirements" and "local community impacts considered on an overall impact basis." Yet it seems that SPR, if their Application is consented, will have their cake and eat it. They will achieve their integrated approach but the requirements of each project will be considered separately and local community impacts will be managed on a project by project basis. We believe it is the role of the Examining Authority to insist that future requirements are taken into account within this Examination and local community impacts considered on an overall impact basis.



8. In the Annex entitled:” Sensitivity study on the effect of change in the starting date of offshore grid coordination”, we note that there are top line summary charts showing that an Integrated Scenario2025 is viable and delivers significant benefits including cost benefits and less impact on land. Scenario2030 is presented as less attractive in terms of cost and impact on land. On Page 14, in Scenario2025 there is a chart showing that Sizewell/Friston is a substation site but it is not designated for 2030. We are given no explanation or rationale for this, but we can hypothesise that the implication is that if they get the go ahead for the SPR EA1N and EA2 plans, the future integration will be more straightforward. We request more detailed presentations from NG ESO to clarify these intentions and ask for the possibility to direct our questions to this chart. We believe that there are better alternative brownfield sites for this mass industrialisation and we object to this option. Without a more detailed presentation the Examiners and other IPs are unable to assess the relative merits and demerits of these new Scenarios.

We thank you for your attention to this matter.

Yours sincerely,

The SEAS Team

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*Yes to Offshore Wind Energy,  
Let's do it Right*