

Offshore Wind Farms

EAST ANGLIA ONE NORTH

PINS Ref: EN010077

and

EAST ANGLIA TWO

PINS Ref: EN010078

SEAS Further submission

with regard to a ‘split decision’

A ‘Split Decision’- A Positive Way Forward

Deadline 13 – 5 July 2021

The final Deadline before the nine month examination
closes at midday 6 July 2021

by

SEAS (Suffolk Energy Action Solutions)

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

Unique Ref. No. EA2: 2002 4496



<https://www.suffolkenergyactionsolutions.co.uk/>

info@suffolkenergyactionsolutions.co.uk

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A ‘Split Decision’- A Positive Way Forward

1. If EA1N and EA2 are consented, the substation site at Friston will form part of the East Anglia wind energy strategy and become the site of an ‘Energy Hub’. Evidence for this hub has been well documented. The latest piece of evidence came to light on April 22 2021 when this video <https://www.youtube.com/watch?v=pjazSaOKmpo> was uploaded onto National Grid's website, quite clearly showing National Grid's intention to make Friston into an Energy Hub.
2. The devastating impacts of these projects on the onshore economy, environment and local communities have been well documented throughout the nine month examination and clearly outweigh the benefits of these projects as a whole.
3. In SEAS's [REP5-114](#) we propose a positive way forward, a ‘split decision’ so that:
 1. The offshore turbines are recommended for consent. This will mean that no time is wasted in respect of construction of the turbines.
 2. The onshore infrastructure is rejected in favour of full consideration of better locations for this infrastructure where the adverse impacts are minimised at a brownfield or industrialised site.
4. In this way the offshore turbines can be consented and constructed as planned and cause no delay to the government's role out of its 2030 offshore wind target.
5. A ‘split decision’ would enable an alternative brownfield or pre-industrialised grid connection to be identified in line with the government's emerging environmental and wind energy policy and thereby ensure the onshore infrastructure minimises its environmental and community damage in line with the [Energy White Paper, Powering Our Net Zero Future](#) and the government's [25 Year Environment Plan](#). Alternative brownfield or pre-industrialised sites have been identified:
 - (i) by SASES in their Pathfinder Project, namely BRAMFORD [[REP12-127](#)];
 - (ii) Therese Coffey has been consistent in proposing BRADWELL [[REP10-070](#)]; and
 - (iii) Mulbarton Parish Council in their East Coast Pathfinder proposal suggest GRAIN [[REP12-109](#)].

6. It is quite likely that even if this Application is consented in full it may well miss the CfD (Contract for Difference) to be held later this year. In this case it may be late 2023/24 before the Applicant has an opportunity to bid in a CfD. By 2024, if a 'split decision' was granted and the consenting process was quickened, (as it has been suggested it will be by the Secretary of State for Business, Energy and Industrial Strategy, The Rt Hon Kwasi Kwarteng MP), SPR would have sufficient time to submit an alternative proposal with a grid connection designed to cherish our environment and also maximise efficiency. Viewed in this way, no time would be lost in achieving 40GW by 2030.

7. A split decision would enable an onshore site to be chosen with greater suitability to become an 'Energy Hub' in line with the government's policy of integration of grid connections. For example, as the Secretary of State for Work and Pensions The Rt Hon Thérèse Coffey MP says:

"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"

8. A split decision would enable an onshore site to be chosen which takes advantage of the BEIS Offshore Transmission Network (OTNR) Review which has requested 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 offshore and reduce the harm to the environment. This does not require a ring main or shared assets but still enables an alternative grid location to be brought forward with less damaging impacts on our environment and coastal economies in line with the [White Paper](#) and objectives of the [BEIS OTNR Review](#).

9. SPR has argued that the necessary HVDC technology is not available for wind farm connections. This is nonsense. 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). Other North Sea neighbours, Denmark, Germany, Holland and Belgium are using technology to integrate offshore. If SPR were willing, they could coordinate their EA1N and EA2 wind farms and deliver the power from those two farms together to a single site using HVDC rather than HVAC technology. Ofgem have confirmed that "there is scope for the development of shared assets and this can be considered within the existing regime".

10. Professor Tim Green of Imperial College London, co-author of the [White Paper](#)

['Net-zero GB electricity: cost-optimal generation and storage mix'](#) has stated *"The capacity of offshore wind needed to achieve net-zero electricity for Great Britain in 2035 is at least twice the existing 2030 target"*. The UK clearly needs to ramp up the construction of wind farms. It is thus

essential that we get this East Anglian Hub right NOW and save time by avoiding a lengthy judicial review process not only for EA1N and EA2 but for the future projects planned to connect on the shores of East Anglia such as Nautilus, Eurolink, North Falls, Five Estuaries, SCD1 and SCD2.

11. Costs will be incurred wherever projects come ashore as National Grid will need to upgrade the lines. But the long term cost benefits from integration have been documented in [NGESO's Offshore coordination Phase 1 Final Report](#) 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.'

Spaghetti like radial connections have long been discredited; we cannot afford to wait.

12. The split decision gives the government an opportunity.

(i) An opportunity to choose a Grid connection on a brownfield or pre-industrialised site which has the long-term capacity to act as a wind energy hub and thus facilitate the timely consenting not only of EA1N and EA2 but future projects planned to connect in the area. Thus avoiding the costly and lengthy Judicial Review process as has been experienced in Norfolk.

(ii) An opportunity to give new strategic direction to the UK's offshore wind industry and pilot an East Anglian 'Pathfinder' project with integrated offshore solutions in order to minimise the number of connections onshore and thereby creating significant economies of scale and synergies. A major opportunity to lead the world in terms of wind energy infrastructure.

(ii) An opportunity to nurture and grow the Suffolk Heritage Coast's nature based tourist economy.

(iii) An opportunity for a grid connection to be chosen in line with the government's environmental policy to protect Areas of Outstanding Natural Beauty.

(iv) And ultimately the opportunity to accelerate the government's wind energy targets.

With the majority of the Community favouring a 'Split Decision' we hope that the Examiners' seriously consider SEAS's final submission and refuse SPRs DCO as it stands, but recommends to the Secretary of State a 'Split Decision'.

With Kind Regards

The SEAS Team.

5 July 2021