SEAS response to Ofgem's Consultation:
Initial Project Assessment of the
Offshore Hybrid Asset Pilot Projects

24 May 2024

Introduction

Suffolk Energy Action Solutions (SEAS) was set up in July 2019 in order to promote modern, smarter offshore solutions for wind energy delivery with connections to the grid at brownfield sites, closer to demand.

We are a community-led organisation dedicated to stimulating positive, sustainable solutions and economic opportunities for British technology and manufacturing. Our team includes engineers, environmentalists, economists, entrepreneurs and ecologists all volunteering their own time.

SEAS are committed to two objectives:

- Promoting the best long-term strategic wind energy solutions for Britain as a whole, encouraging opportunities for British businesses and the economic regeneration of brownfield areas, whilst preserving nature-based coastal economies.
- Safeguarding areas of outstanding beauty, rare heathlands, vital wetlands and diverse wildlife from needless damage

We all need to consider the bigger picture, of the unprecedented planned scale of increase in offshore wind power capacity, and the need for more modern, flexible and efficient transmission network solutions, to deliver energy offshore, directly and more cheaply to brownfield major hub sites such as Rotterdam, Zeebrugge, Tilbury, Grain, and future brownfield sites yet to be nominated.

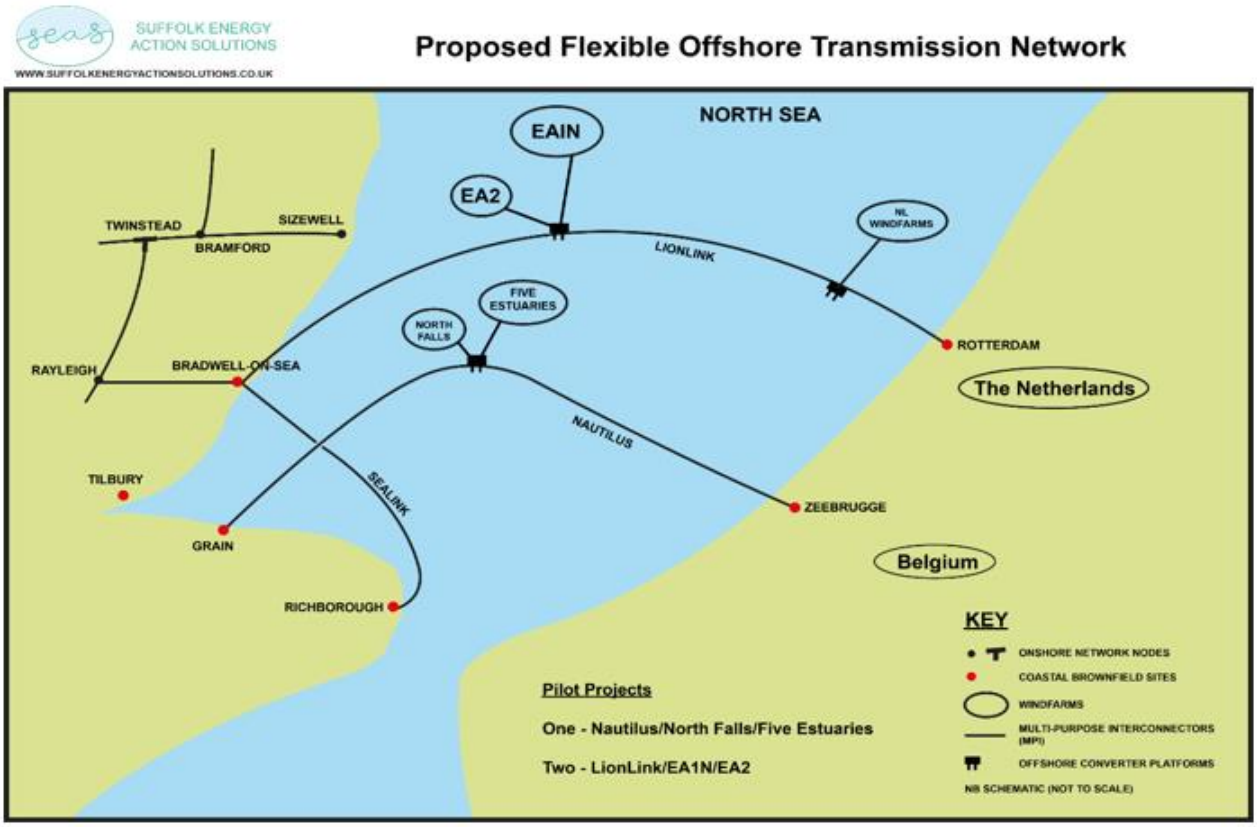
For the last two years SEAS has proposed two Pilot Projects, following offshore grid design principles, in order to build a foundation of experience and expertise, that will then allow us to expand the offshore transmission network steadily over the next 20 years, matching realistic growth targets for offshore generation:

Pilot One: Nautilus interconnector

This was the original OCSS proposal put forward by National Grid Ventures and the Five Estuaries and North Falls developers RWE and SSE Renewables, taking power to West Grain in Kent. We continue to believe that this Pilot One should go ahead as originally planned because it is the most beneficial way to bring this wind energy directly to London and the South East. It is consistent with the Future Framework plan and should not be shelved as it would help decision-makers gain an understanding of the practical challenges to be overcome to deliver this modern approach to offshore coordination.

Pilot Two: LionLink interconnector

Scottish Power Renewables Windfarms East Anglia One North (EA1N) and East Anglia Two (EA2) can combine energy offshore through LionLink and take power to the brownfield site of Bradwell-on-Sea as per our schematic below:



SEAS Response to Ofgem Consultation

1) SEAS welcome Ofgem's introductory comments in the Executive Summary (page 5) outlining how OHAs can:

- "…provide a first step towards a more strategic and integrated electricity grid in the North Sea"
- "…reduce the impact on coastal communities and the marine environment by reducing the number of cables and onshore converter stations required"

2) The Strategic Case for OHAs (sections 2.1 to 2.9) provides a useful summary of the potential benefits of OHAs, with which we concur

3) We welcome the inclusion of "Hard to Monetise Impacts" in the Multicriteria assessment (MCA) Framework Report (page 26), including Environmental, Local community, Noise/disturbance, Landscape and Other impacts. This points to a more holistic and balanced approach to these complex decisions, weighing both quantifiables (typically economic) with the unquantifiables (typically the softer human/societal aspects)

4) We are disappointed that Arup have failed to make any estimate of the Hard to Monetise (HtM) Impacts (para 3.33). Whilst these are, by definition, *harder* to monetise it is not impossible to make plausible estimates, given a set of reasonable assumptions, or provide a range of quantified outcomes. As an example, the Direct Marketing Organisation has estimated the impact of the energy projects on Suffolk Coastal in terms of loss of jobs and business in the tourist economy, the economic mainstay of the area. Over the 12 years of overlapping projects (including Lion Link), this could total a cumulative £1bn, so is not insignificant. This translates directly into significant job losses of many types in the hospitability and service sectors which provide a wide range of opportunities for low skill, medium skill and part-time workers supporting a demographically balanced population. Using these metrics, consideration of alternative landfall sites becomes more constructive - our contention is that incremental costs associated with brownfield connection sites would be more than offset by these socio-economic factors.

5) We are concerned that whilst Arup rated the HtM factors as RED (para 5.2), Ofgem rated them AMBER (para 5.3) without clear explanation of the rationale. Might a RED rating result in a "minded to" rejection of LionLink?

Conclusion

This Report is the first significant acknowledgment from Ofgem that a flexible offshore grid is the right way forward. There is now a growing demand for a moratorium on all East Anglia projects in order for the new NESO to study the benefits of offshore grids and to reflect on what an increasing number of specialists are saying: offshore is better, cheaper, faster.

National Grid's plans are looking more outdated by the day. They are needlessly destructive and self-serving.

With a new Government and NESO in place, it's time to draw up a Masterplan for Energy Infrastructure and part of that plan is to select major hubs at brownfield sites, closer to demand, accepting that hubs should not be located in areas of natural beauty close to thriving tourism Nature resorts.

Superconducting cables are going to be available by 2032 which will help resolve current practical issues of capacity delivery. Aggregation of offshore wind is now an imperative. The technology revolution is occurring around Britain. It's time for Britain to take part and innovate.

We welcome the Ofgem summary of benefits but question the validity of their conclusions relating to LionLink's "amber" impacts. The Winser report holistic criteria are not aligned with these findings. Major energy industrial concrete and steel infrastructure is not compatible with Nature based tourism.

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