

## OTNR Ofgem consultation on changes intended to bring about greater coordination in the development of offshore energy networks, July – September 2021

### Comments by Dedham Vale Society

Our primary focus is on proposals directly affecting the Dedham Vale. Two of the earliest projects currently proposed would have severely detrimental effects on the Vale:

1. The second 400 kV transmission line from Bramford to Twinstead, BTNO in the Network Options Analysis nomenclature, and associated infrastructure;
2. A 400 kV transmission line in “Southeast Anglia”, ATNC, effectively south or west from Bramford.

Detailed proposals for BTNO are effectively available following the earlier consultation. No such detail is publicly available for ATNC, but it is clear (1) any route will affect either the Dedham Vale AONB or the Suffolk Coasts and Heaths AONB; and (2) it cannot be ruled out that ATNC eventuates as a 3<sup>rd</sup> Bramford to Twinstead line.

We recognise the compelling arguments for the rapid development of wind power off shore to East Anglia and its transmission to markets in the Greater London area.

The preferred, and arguably the only practicable, way to combine this with avoiding permanent severe detriment to the historic, landscape and natural environment is for the new power supplies to be transmitted offshore, bypassing the AONBs.

It is now accepted that an “offshore grid” is the economical way to handle the development of East Anglia offshore wind power. So if it’s the economical solution, and the environmentally desirable solution, what has stopped it happening?

Ofgem and BEIS have told us that there are no institutional obstacles requiring primary legislation. The ESO (Electricity System Operator, ie National Grid) and developers have told us there are institutional obstacles. It is clear that nothing practical is happening now to bring about an integrated offshore grid, and indeed the content of the consultation document tends to confirm that there are institutional obstacles, but not requiring primary legislation.

Which puts the ball firmly in Ofgem’s court.

It is Ofgem who need to act to bring about early design, development and operation of an integrated offshore grid solution. We fear Ofgem doesn’t see it this way. The Ofgem stance appears to be that their’s is an enabling role. See especially Consultation document paragraphs 2.63 – 2.66 headed *Our expectations on who is best placed to raise modification proposals*: 2.63 “We expect the industry-led governance processes set out in the respective codes to be used”; 2.64 “We think industry and the ESO are best placed to develop and propose modifications in the context of this workstream”; 2.65 “We expect the ESO will take the lead . . .”.

And if “industry and the ESO” don’t get on with it, as they have not got on with it so far?

We submit that Ofgem (and BEIS) need a radical change of ethos. They need to see their job as ensuring the integrated offshore grid happens, and urgently. So the question becomes: does this require primary legislation?

We have no other problems with the proposals in the consultation document. They’re all fine on a leisurely, business-as-usual, we simply set the rules for others to play by, basis. Just that this basis won’t do any longer.