

**OFGEM consultation, August 2023 - Centralised Strategic Network Plan:  
Consultation on framework for identifying and assessing transmission  
investment options**

<https://www.ofgem.gov.uk/publications/centralised-strategic-network-plan-consultation-framework-identifying-and-assessing-transmission-investment-options>

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From: Suffolk Energy Action Solutions (SEAS)

SEAS are fully in favour of the increased generation of offshore wind power and since 2019 have proposed integrated offshore solutions by pooling two or three offshore wind farms to a central offshore platform for transmission to brownfield sites closer to demand, based on the Belgium model created by ELIA using a Modular Offshore Grid (MOG).

Below are SEAS response to Ofgem's questions. Some questions are for industry have therefore been left blank.

Q1. Do you agree with our broad regulatory approach to establishing the FSO's obligations to the CSNP products?

Yes, in broad terms

Q2. What are your views on the types of system need that we have proposed are covered by the CSNP? Are there any gaps?

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Q3. Do you agree that the time horizon for system need assessment should be extended to 2050?

Yes, it should be extended. SEAS believes that holistic, long term strategic thinking is required to drive the CSNP. The Crown Estate is readying for the next round of sea bed leases. The North Sea growth potential is enormous: by 2030 17.4GW and by 2050 a further 27.5gw is expected along with various interconnectors. This amount of energy has to be taken by Sea to where the power is needed. The present piecemeal radial connects can no longer be allowed and an integrated Offshore Transmission Network (offshore grid) should be built, taking the power closer to where it is needed (London and the South) utilising Brownfield sites as Energy Hubs for substations, storage and other infrastructure.

Q4. Do you agree that the FSO should move to a year-round nodal assessment of system need as part of the CSNP?

Yes. Boundaries are arbitrary. Nodes are real.

Q5. We welcome stakeholders' views on how the FSO can communicate effectively about future system needs?

It is essential that the FSO consult community groups, NGO's, Parish and Town Councils very early on in their future system needs – all these parties should automatically be made local stakeholders.

It will be the responsibility of FSO to allocate the grid connections. The lack of NG ESO's early communication and transparency with local stakeholders led to a completely unsuitable connection to a non-existent Leiston 400kv substation being allocated for EA1N/EA2. Should there have been early local communication and complete transparency they would have gained a huge amount of local knowledge which would have revealed the Leiston area unfit for National Grid's stealth plans for a massive 'Energy Hub'. Instead, the Community were kept in the dark and dealt a fait accompli. There were no assessments of alternative brownfield sites such as Bradwell or Grain or Tilbury because it was cheaper to churn up virgin countryside (our lungs), prime agricultural land (our food) and protected land such as AONBs, SSSI (our ecology). The resulting choice of Friston for National Grid's Energy Hub is untenable, a choice for National Grid to profiteer; bring the power into Friston and straight back out to be sold by National Grid's commercial arm NGV interconnectors to Europe.

Government have allowed this travesty to happen, but could easily correct it. Technology has moved on. NGV's Nautilus Interconnector will pool North Falls and Five Estuaries to a Platform at Sea and take their power to Grain. The same could be done with LionLink taking SPR's EAN1 & EA2 power to Bradwell. As SPR have delayed by two years, this could easily be achieved if Government mandated ESO/FSO to give SPR a new connection point at sea to a platform owned by FSO but built by NGV's Lionlink.

NGET have done the same with the Norwich to Tilbury Pylons, a fait accompli with no alternative options. Pylon Stakeholders are, rightly, very unhappy that the very popular alternative integrated offshore grid has not been presented for consultation. It is therefore imperative that the FSO is able to engage early, long before decisions are made.

Q6. What are your views on the FSO establishing minimum design requirements for high-level option designs and are there areas where exceptions are needed?

The Treasury Green book guidance should be used in minimum design requirements.

Q7. Do you have any views on our proposals for considering environmental and community impacts as part of high-level design of options?

During the planning inspector's hearings for SPR's DCO, Natural England, Environment Agency and the Marine Management Organisation were unable to attend some of the environmental hearings. This was expert testimony that was missing and may have been detrimental to the outcome - all due to underfunding and overload of NSIPs and other duties. These Government funded entities are in great need of funds to employ more people to be able to meet their mandated obligations and properly represent the environment and the people residing therein.

Treasury Green Book guidance is mandatory and must be followed. It contains tools for considering environmental and community impacts. In addition, DEFRA's Natural Capital (ENCA) tools should be used.

The four design objectives of the HND, environment and community must be given equal weighting with economic and technical factors in the CSNP process. It is clear that if the objectives are given equal weighting, then an integrated offshore grid to brownfield sites will fare very well on the community and environmental impacts versus offshore radial connections to multiple substations resulting in hundreds of miles of new overhead. This can be resolved by an offshore transmission network, an offshore grid.

There also needs to be a mechanism to look at the effective use of the existing network – for example Bradwell on Sea where there is a disused 132kv substation and disused pylon run, both of which should be repurposed/ upgraded to 400kv and used to serve offshore wind farms. East Anglia North One and East Anglia two could easily connect to Lionlink interconnector and take their power to Bradwell, thereby preserving an outstanding area of beauty, The Heritage Coast.

Q8. Do you have any views on our proposal for the FSO to independently decide which network needs it may lead the high-level design of?

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Q9. Do you have any views on our proposal for the FSO to set out how and when third parties can be involved within the CSNP?

Third parties need to be involved early on in the process. Community groups need to be included and must be able to be present alternatives for consideration - their valuable local knowledge should not be dismissed as has been the case to date.

Q10. Do you have any views on our proposals on data exchange to enable the implementation of CSNP?

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Q11. Do you have any views on our proposals regarding the principles to be followed in the CSNP decision-making framework?

There should be a principle that local communities should be consulted at the outset using a non-statutory consultation and workshop where the discussion is recorded verbatim?

Q12. Do you have any views on our proposals on the decision-making framework for selecting potential projects to address longer-term system needs?

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Q13. Do you have any views on the decision-making framework to bring potential projects into the 'delivery pipeline' for nearer-term needs?

We urge Government to set up a neutral team of specialists to advise their own civil servants and to provide inspirational guidance to the FSO. Our current resources at the National Grid have limited experience of these new technologies and solutions. Elia and Tennet are two leading system operators. They are at least five years ahead of NG ESO in their planning. Britain needs to be less reactive and more proactive. This is only possible if we have the ambitious leadership required to make step change decisions.

We need an Ofgem with a revised, more sustainable mission. Currently the criteria of best consumer price causes the wrong short term decisions to be made. Their new mission needs to encompass full HND criteria and cost efficiencies achieved in the mid term by pooling energy at sea.

Q14. We would welcome views on our proposal to not re-evaluate projects that are in the delivery pipeline, and whether a materiality trigger is appropriate and what criteria might be used.

A materiality trigger is appropriate. A re-evaluation could be called when there is a material change such as with SPR when they put in a request to move EA1N and EA2 from Bramford to another location. This should have been re-evaluated by the Secretary of State and the Planning Inspectors under the NSIP process, instead it was put through as a Non-material request to the local council who were not

qualified to assess the consequences. Hence a consented DCO for four windfarm connections cutting across 34 miles of AONB, arable land and countryside being reduced to two, thereby undermining the whole oversight procedure.

A materiality trigger would also be appropriate with Norwich to Tilbury, when the majority of stakeholders do not believe that the chosen proposal is the best one and if there is an alternative such as an offshore transmission network (offshore grid) which requires full evaluation.

Q15. Do you have any views on our proposal on inclusion of environmental and community impacts in the CSNP CBA?

This is an essential inclusion. As with the four design objectives of the HND, environment and community must be given an equal weighting with economic and technical impacts. The Treasury Green Book guidelines are also important here. We would like to see its mandatory status implemented at all times.

Q16. Do you have any views on our proposal for the CSNP to include a methodology for assessing and taking forward system operability solutions?

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Q17. Do you agree with our proposal for the ESO to review its current approach to assessing short and long term solutions, and for the FSO to set out its approach in the CSNP Methodology?

Yes, see Q13

Q18. Do you have views on our proposals for FSO to develop capabilities to consider different combinations of options and how this should be implemented?

The Treasury Green Book is mandatory and should be followed by all Developers.

Q19. Do you agree with our proposal to introduce a requirement, as part of the new CSNP licence condition, for the FSO to make recommendations on additional interconnection and OHAs opportunities between GB and other markets?

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Q20. Do you agree with our proposal that the FSO should use reasonable endeavours to support relevant stakeholders as part of the offshore asset development process?

Yes. However, the East of England was wrongly scoped out of the OTNR and 2022 HND. It must be scoped back in and a plan for the growth of offshore wind in the North Sea must include an integrated offshore grid.

Q21. Do you agree with our proposal that the FSO assess third-party options under the CSNP and recommend delivery by competition where proposed solutions meet the relevant competition criteria?

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Q22. What are your views on whether changes to the SQSS or obligations on licensees are needed to support the CSNP – where specifically are these changes needed and when do they need to happen by?

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Q23. Do you agree that the FSO should evaluate the climate resilience of the long-term whole-system CSNP?

Yes. It is imperative to evaluate the release of CO2 and particulate matter from building multiple onshore substations and new overhead lines. It is massive and can be dramatically reduced by offshore platforms and subsea cables taking the power direct to end use.

Q24. Do you agree with the proposed position on the treatment of connections in the CSNP?

Yes. However, the East of England was scoped out of the HND and needs to be brought back into the fold with a strategic review of the North Sea to 2030/50 and landing points (including Bradwell, Grain and in North East Anglia, Walpole) needs to be carried out.

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