**Regional Energy Strategic Plan policy framework consultation response**

## 1. THE BIGGER PICTURE: SPATIAL ENERGY STRATEGY PLANNING IS BASED ON CORE DESIGN PRINCIPLES

Since July 2019, Suffolk Energy Action Solutions (SEAS) has submitted responses to numerous Ofgem and National Grid ESO consultations and we have consistently called for the following core design principles to be applied nationally:

1. Refurbish/ upgrade onshore infrastructure to optimise capacity
2. Use existing brownfield sites first
3. Pool offshore wind farm power offshore
4. Route power offshore directly to the centres of demand

Offshore4sure is a network of like-minded groups emerging around the country and SEAS has become part of this wider national campaign.

Fiona Gilmore, one of the Directors of SEAS, gave a presentation at the 2024 Labour Party Conference calling upon the new Government to seize the opportunity to see the bigger picture and pivot now to an integrated offshore-onshore grid spatial energy plan. The "Great British Offshore Grid" document was launched at the Conference and its overall message was that it's the "faster, cheaper way to Net Zero".

## 2. CRITIQUE OF THIS OFGEM RESP POLICY CONSULTATION

This RESP policy paper is flawed from the outset because its premise is narrow and artificially limiting. 2030 is a random year for achieving a new clean energy infrastructure, and fails to acknowledge the most important overall objective, namely to create a robust, flexible framework for an integrated onshore-offshore grid.

If the first stage of that offshore component is complete by 2033/34, it is then infinitely expandable and starts to realise the full potential of the North Sea Corridor as the principal arterial route for carrying this offshore wind power. We recognise that new pylons and upgraded pylons are required as part of the overall grid structure and we welcome those additions if they are part of a smarter master plan.

A British Energy Infrastructure Master Plan should start with the bigger picture and selection of major brownfield hub sites viable for vast storage and expansion potential should be chosen using Holistic Network Design Criteria rigorously.

Ofgem and DENZ should not be distracted by National Grid plc's outdated plans using needlessly damaging site locations for landfalls and hubs.

These proposed plans were conceived between 2013 and 2017 and were based on an archaic grid system suited to early 20th Century fossil fuel production and short-term point-to-point connections, rather than network grids using offshore delivery systems

for offshore wind. These are the wrong plans and use the wrong places for major industrial hubs.

Using the excuse of an arbitrary year 2030, these ill-conceived plans could be allowed to go ahead, even though they make no sense, and the adverse impacts of their combined implementation severely outweigh any putative benefits. Note that those cumulative adverse impacts are never assessed fully because the current DCO process examines projects individually as if they were in isolation of one another.

Ofgem has as part of its legal remit to ensure that the cost benefit analysis is conducted properly and transparently. This East Anglia cost benefit analysis has not been carried out effectively and until this full comparative evaluation has taken place, the current RESP policy consultation document is a sideshow.

A full Cost Benefit Analysis would evaluate the costs of an integrated offshore grid using brownfield sites such as West Grain and Bradwell versus sites yet to be developed such as Friston and Saxmundham.

Offshore platforms cost more in the short term but in the mid-term are significantly more cost effective because they make over 50% of the onshore infrastructure redundant. Ofgem's March 2024 Report on Offshore Hybrid Assets (OHAs) makes this point.

A credible Cost Benefit Analysis (CBA) explores the true costs of intense industrialisation to a highly successful rural- coastal tourism sector and the intangible costs to communities and sensitive environments.

This holistic CBA is standard best practice for Elia, TenneT and Orsted. Britain should not fall foul of its usual short-termism, lack of robust research and absence of a national master plan.

National Grid's outdated plans should be reassessed by independent specialists, possibly by those from other North Sea countries who have proven track records in building offshore platforms and using HND criteria.

In the very short- term, those wind farms which have been given consent such as SPR EA1N and EA2 should be built but using existing brownfield sites for connection such as Bramford, Bradwell, Grain. The criteria should no longer be shortest point to point radial connection landfall site.

In the mid-term, the offshore platforms will be constructed and a network of subsea cables will carry that wind power more directly to centres of demand.

Interconnectors should be reassessed in terms of this bigger picture and industrial brownfield sites should be used exclusively for these projects which concern the export (import) of excess energy to (from) other North Sea countries.

## 3. REGIONAL ENGAGEMENT: WHEN, WHO AND HOW?

Historically, these Development Consent Order processes have been frustrating for local communities. An NSIP project is like a juggernaut and it is rare for a community to halt one even when there are evidential arguments against these plans.

**WHEN**
If the Master Plan is drawn up using Nick Winser's criteria as set out in his report of July 2023, local communities would be consulted at the very outset, before hubs are chosen.

**WHO**

- Local communities know their environments better than any outsider who uses superficial desk research.
- We see how developers rely on remote tools and fail to see what is there. We can quote many instances from DCO processes in which we have participated and experienced firsthand.
- Parish Councillors are overwhelmed with the enormity of the tasks that now fall on their shoulders.
- We recommend a wider representation including Parish Councillors but also members of Community Groups who have carried out quantitative and qualitative studies relating to ecology, environmental sensitivities, traffic, tourism impact, mental health, well-being and economic growth.

**HOW**
We have proposed in previous consultations that these Energy Infrastructure Community Diversity Groups (CDG) are chosen with leaders voted to take two-year terms, taking it in turns to provide direction and initiative.

## 4. WHAT DOES REGIONAL ENGAGEMENT MEAN?

Theoretical remote research has been shown time and time again to be flawed.

CONTEXT IS EVERYTHING.

A developer has not historically used the tools to explore the context except at a crude and superficial level.

It should no longer be the job assigned to a developer. It is not their skill.

Community context evaluators should be selected on the basis of the now accepted HND criteria. In other words, there should be impartial, independent specialists (not appointed by the developers) in ecology, social wellbeing and economic growth whose job is to work with the Community Diverse Groups to interrogate the possible threats and sensitivities.

Contextual analysis is essential and it is how our North Sea neighbours have ended up using major industrial zones such as Rotterdam and Zeebrugge for their Hubs, and how they avoid using rural havens best suited for tourism and food production.

**5. NESO's NEW ROLE AS IMPARTIAL ADVISER**

In this new world, NESO HAS TO START OPERATING AS A STRATEGIC ADVISER TO DENZ. A new impartial big picture planner is NESO's remit. No more short-term outdated thinking.

This is a tall order for an organisation who has shown no evidence of big picture thinking when it was National Grid ESO. With the same CEO, and with no proven track record in offshore grids, it is doubtful that this new organisation is going to become a big picture thinker overnight.

We recommend that Great British Energy and the Crown Estate seek to have within NESO a new offshore specialist team to supplement.

We recommend that other thought leadership groups are available to add extra expertise and ideas for this hugely important task of establishing a national master plan for energy generation, delivery and storage.

**CONCLUSION**

Consumer price for green energy is a critical issue right now. Energy security is another critical issue and biodiversity depletion cannot be ignored in the name of climate change. The 10% biodiversity net gain mitigation mantra has been devalued by projects carried out ostensibly offering new ecology havens, but which cannot ever replace ancient rare ecologies and which are not without their own destructive elements. These three interrelated crises are all driving the need to develop smarter, renewable solutions.

For once, let's humbly learn from our neighbours and apply best practices in the way we create our Future Framework.

This Consultation must be considered in the wider context of making a positive step change in our thinking and with a more enlightened vision of what matters, we can achieve the three objectives:

- Greater energy independence and security.
- More cost- efficient, faster to implement solutions.
- Biodiversity protection on which this planet rests.

Regards,

Fiona Gilmore

on behalf of Suffolk Energy Action Solutions