

MULBARTON PARISH COUNCIL

Norfolk Vanguard and Boreas with Hornsea Three

20th October 2021

Introduction

This representation responds to the Secretary of State's Norfolk Boreas consultation letter of 22nd September 2021 and the clarification issued on 24th September 2021.

It relates to the Norfolk Vanguard and Boreas offshore wind farms and their interaction with other large scale offshore wind projects in the Hornsea and East Anglia zones. These projects, including Hornsea Three, are specifically referenced in the consultation letter.

A very similar consultation for Norfolk Vanguard closes on 8th November 2021.

Mulbarton Parish Council has previously submitted representations on the procedure for the redetermination of Norfolk Vanguard, and these comments also apply here.¹

Key points

1. In our view, the Secretary of State is unfairly and unreasonably favouring the applicant:
 - By conducting two separate processes for Norfolk Vanguard and Boreas with different dates to deal with the same issues. A much better process has been followed by the Planning Inspectorate for the East Anglia One North and Two offshore wind projects.
 - By not releasing the Planning Inspectorate's report on the Norfolk Boreas examination, which we understand has been available to the Secretary of State since January 2021.

Both of these factors have made it much more difficult for Interested Parties to respond.

2. The consultation letter states that the in-combination assessments for offshore wildlife impacts should include Norfolk Vanguard, Boreas and Hornsea Three, but not East Anglia One North and Two, or the Dudgeon and Sheringham Shoal Extensions.

The Dudgeon and Sheringham Shoal Extensions are in a different part of the North Sea, and can reasonably be set aside. The East Anglia One North and Two projects are, however, directly adjacent to Vanguard and Boreas and, in our view, should not be omitted from the in-combination assessments. Similarly, although Hornsea Project Four is located to the north-west of the other Hornsea zone projects, the DCO application has now been submitted to the Planning Inspectorate and in-combination effects can now be assessed.

3. The government's urgent Offshore Transmission Network Review is still in progress and National Grid ESO has recently issued an Open Letter confirming that projects which do not have a Contract for Difference agreement in place are eligible for changes to their grid connection agreements. This applies to Norfolk Vanguard, Boreas, and Hornsea Three.

Close coordination has been enforced for consideration of the offshore wildlife aspects. In our view, it is reasonable to expect a similar degree of coordination to minimise onshore impacts, and further comment on the Norfolk Boreas project should not now be precluded.

Conclusion

The procedure adopted by the Secretary of State for the determination of the Norfolk Boreas application is unlikely to lead to a reasonable and balanced outcome.

¹ Representation contained in document reference EN010079-004328, submitted 19th May 2021.