

From: [REDACTED]  
To: [Hornsea Project Three](#)  
Cc: [REDACTED]  
Subject: Registration Number 20010316 - Oulton Parish Council's submission to PINS at Deadline 9  
Date: 26 March 2019 23:36:02  
Attachments: [PastedGraphic-1.tiff](#)

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Hornsea Project Three

**Oulton Parish Council's submission at Deadline 9**

Oulton Parish Council (OPC) submitted its final comments on the detailed analysis of the evolving Application for Hornsea Project Three at Deadline 8.

In its concluding remarks, the Parish Council reiterated its support for the offshore wind farm but suggested that, in view of the severe adverse impacts of the onshore cabling currently proposed, a design alternative for that part of the project should be considered – that of connecting this and all other offshore wind farms to the national grid via an **offshore ring main (ORM)**.

OPC is concerned that the Examining Authority is unlikely to be aware of the remarkable degree of support that this design alternative has gathered over the past six months, as the Examination process has uncovered the real scale of the impacts of this proposal on the natural environment and the communities of Norfolk.

We therefore attach below, for the ExA's information, a copy of an email letter, which was sent to five Norfolk MPs on 18<sup>th</sup> February 2019. The letter outlined the problem, suggested the solution of an ORM, and exhorted the MPs to liaise and approach government to request a re-consideration of the grid connection arrangements for these wind farm projects, as a matter of urgency. OPC draws the ExA's attention to the fact that this letter was co-signed by:

- 20 Parish Councils along the whole length of the cable corridors for both projects
- Norfolk County Councillors
- action groups
- landowners and farm managers of three large farming enterprises in Norfolk
- 'Friends of North Norfolk'
- Campaign for the Protection of Rural England (CPRE)

George Freeman MP responded immediately and positively and, on 11<sup>th</sup> March 2019, conducted an adjournment debate in parliament on this very issue. The government minister who responded commented during the debate that "it is absolutely right that...we now consider the potential to connect adjacent projects offshore, linking them up...as a ring main."

Because of the current procedures for allocating grid connections via National Grid plc, such a solution has not been available to the current applicant. The cost of installing an offshore ring main could never be borne by a single developer and therefore requires of necessity some **central government planning and investment**.

Keith Simpson MP forwarded the letter of 18<sup>th</sup> February regarding the concept of an ORM to the Project Development Manager of Hornsea Project Three, for his comments. The main thrust of his response was as follows:

"Thank you for forwarding the letter from Ms Shaw and fellow Parish Councillors. The letter raises the possibility of a more strategic approach with regards to the transmission grid for future offshore wind farms connecting into the National Grid in East Anglia, with the expectation that this could limit the impact on East Anglian residents and businesses and on the environment.

**This is certainly an interesting concept and one that deserves further consideration.**

The current regulatory framework requires the wind farm developer to work with National Grid.....the assessment for Hornsea Project Three concluded that ...the developer would cable below ground.....connecting in at the existing Norwich Main Substation.

...**We can only work within the current regulatory regime.**" (*our emphases*)

It is clear from the above letter that:

- (a) this developer (Orsted) is not averse to the concept of an ORM being actively considered;
- (b) this developer is, of course, constrained by the current regime to dig up Norfolk whether they want to or not, in order to connect to the national grid.

The point that has to be promoted urgently with BEIS is that only the government can intervene in this situation to promote tripartite discussions between government, National Grid plc, and the wind farm developers regarding an ORM. The current situation is a regulatory stalemate that will otherwise result in the environmental devastation that we are about to see unleashed on the whole of rural Norfolk by Orsted and Vattenfall.

In planning terms, although this design alternative has been submitted for consideration both at consultation stage and early in the examination process, it would appear that it has not yet been given serious consideration. There are obvious reasons why this might be the case.

It is an axiom of the planning process that it is only ever able to consider "the application that is put in front of it." The Examining Panel for Hornsea Project Three has, however, *rightly* interpreted its remit on this occasion to include also an assessment of the cumulative impact of the second major wind farm project (Norfolk Vanguard/Boreas) that is also currently proceeding through the NSIP planning process. Oulton Parish Council has greatly appreciated the approach of the Panel in its forensic examination of the combined impacts of these projects on onshore communities.

It cannot have escaped the notice of the ExA that, because of the need for a national transition to renewable energy, more of these projects will be knocking on the door asking for consent to dig up East Anglia in the very near future.

OPC fully understands that it is not within the remit or the gift of the Examining Authority to enable the construction of an offshore ring main. However, the ExA is uniquely placed to *recommend* to the Secretary of State an active consideration of such a solution to the many and intractable problems generated onshore by the current grid connection arrangements.

Exceptional times call for exceptional measures.

At a time of global crisis over the impacts of climate change, it is appropriate to consider accepting sacrifice. However, it seems unreasonable to require Norfolk to bear the brunt of an entirely *unnecessary* sacrifice, simply for the lack of strategic central planning.

It would be a tragedy if Norfolk were to be devastated by these two current wind farm proposals on - as it were - a technicality, and only because of an accident of timing.

There is a better way of doing this.

Thank you for your consideration of this - for us - gravely serious matter.

Alison Shaw

pp Oulton Parish Council

[In the absence and at the request of the Chair]

**Attachments:**

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To: George Freeman MP, Norman Lamb MP, Keith Simpson MP, Richard Bacon MP, Liz Truss MP

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Dear Member of Parliament for Norfolk,

Re: **Offshore wind farm grid connections – an alternative proposal**

We, the undersigned, are writing to you today to draw your attention to a serious situation taking shape in Norfolk, and to request your assistance.

You will be aware that two Nationally Significant Infrastructure Projects (NSIPs), with massive implications for Norfolk, are currently under examination by the Planning Inspectorate and are likely to be determined by the Secretary of State for Business Energy and Industrial Strategy by the end of this year. Orsted's Hornsea Project Three and Vattenfall's Norfolk Vanguard (soon to be followed by Boreas) will bring onshore electricity generated by offshore windfarms with an output equivalent to that of five Sizewell nuclear power stations.

The scale of these projects is unprecedented.

Between them, these NSIPs will necessitate the digging of two wide cable trenches North-South and East-West across the Norfolk countryside for a total of 115 kilometres. The construction of these trenches and the enormous substations, converter stations and booster stations that have to be built along them will have an immense detrimental impact on Norfolk's natural environment, agriculture, tourism, business, and residential amenity.

The people of Norfolk are only just waking up to the nature of the colossal impacts they are about to experience over a period of anything up to 8 years - and beyond, as further offshore windfarms are waiting in the wings.

The signatories to this letter understand the need for renewable energy and support the use of offshore wind farms as part of Britain's lower-carbon energy mix. What we struggle to accept is the need for the environment of Norfolk to be so thoroughly devastated by one single aspect of these plans - the grid connection arrangements - which could be executed entirely differently.

The necessity for 115km of cable trenches across Norfolk and enormous sub- and booster stations is entirely dictated by National Grid's allocation of grid connection points inland at Necton and Swardeston. The need for this onshore disruption would be completely obviated if an alternative proposal were implemented, namely - the construction of an offshore ring main (ORM).

Such a ring main could encircle the coast of East Anglia, avoiding any Marine Conservation Zone, and all current and future offshore wind farm developments could connect to it by means of offshore substations.

This ORM proposal has been worked on over many months by a Norfolk resident living close to the cable crossover point shared by these two projects. A statement outlining the proposal, and including a comprehensive graphic illustration, is attached below.

It would seem that at the moment nobody has the responsibility, foresight or inclination to coordinate the UK's major transition from fossil-fuel generated energy to renewable energy - and this situation has to change. There is an acute need for strategic policy thinking at the heart of government.

We urge you all, as rural Norfolk's representatives at Westminster, to liaise on this issue and to discuss this alternative proposal with the Secretary of State, as a matter of urgency.

Thank you for your consideration of this matter.

Signed:

Alison Shaw

Oulton Parish Councillor

Co-signed:

Oulton PC

Edgefield PC

Corpusty and Saxthorpe PC

Wood Dalling PC

C. Barratt, Chair, Heydon Parish Meeting

B. Schuil, Chair, Cawston PC

J. Greves, Chair, Salle PC

Kelling PC

R. Johnson, Chair, High Kelling PC

Mulbarton PC

Swardeston PC

Happisburgh PC

Ingworth PC

Bradenham PC  
Holme Hale PC  
Necton PC  
Weybourne PC  
Blickling PC  
Fransham PC  
Aylsham Town Council  
Lombe Estate Trust  
CM Watt Residual Trust, Thickthorn Estate, Hethersett  
Mackintosh Trust, Thickthorn Estate, Hethersett  
Thickthorn Farm, Norwich Road, Hethersett  
Salle Farms, Salle  
Necton Substation Action Group  
Happisburgh REACT  
Greg Peck, Norfolk County Councillor  
Steffan Aquarone, Norfolk County Councillor  
Friends of North Norfolk  
CPRE, Norfolk

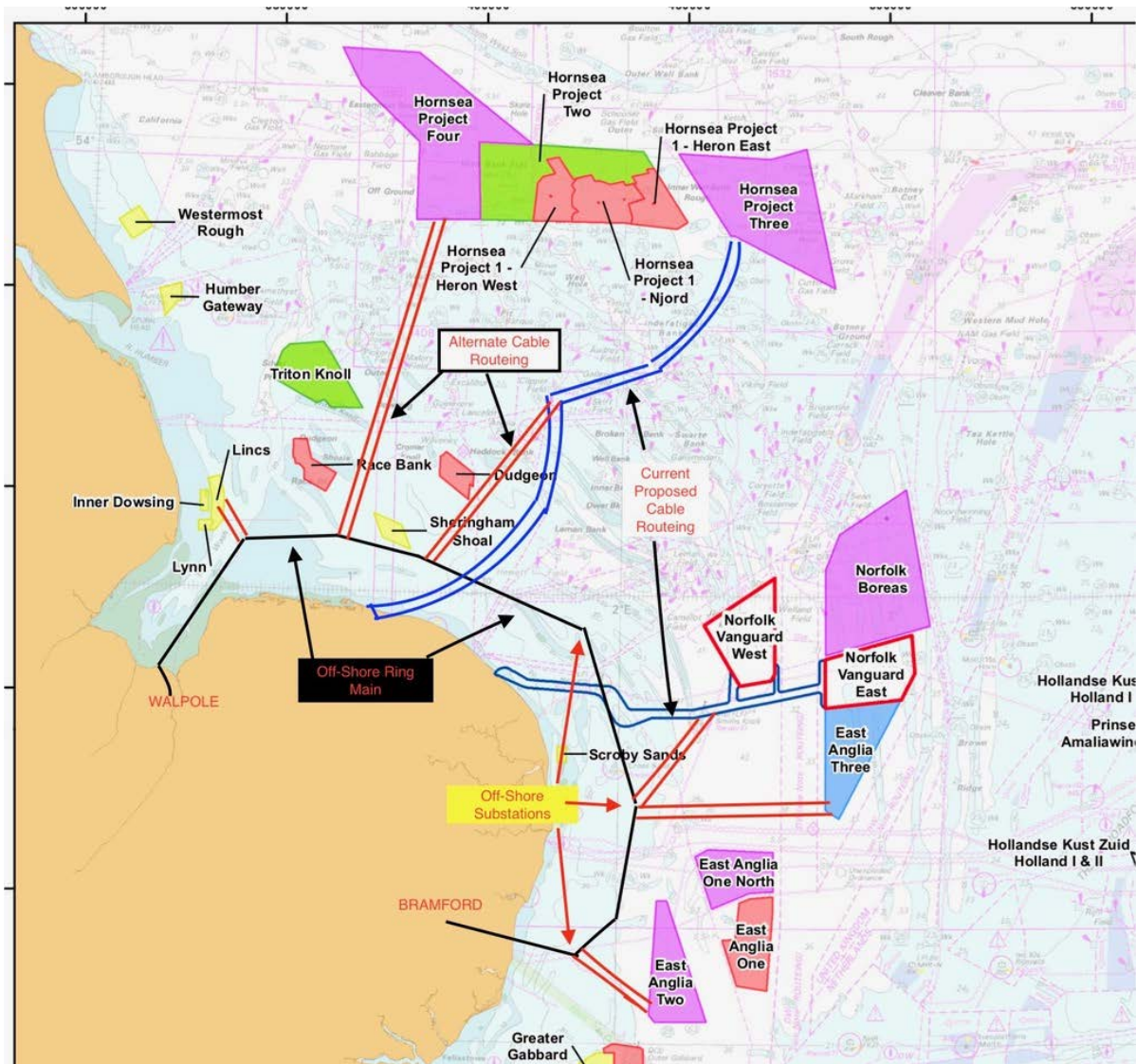
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#### **OFFSHORE RING MAIN - Summary statement**

**There are alternatives to how offshore-generated renewable energy can be brought onshore. A simple offshore extension to the NETS, outside of any Marine Conservation Zone, with collecting substations on platforms similar to those proposed by both projects for their wind farms, could easily be designed and constructed. Offshore wind farm developers could then pay a connection levy to access the Offshore Ring Main (ORM), which would cover the cost of construction and may even generate a profit for the UK. Developers would save all the costs of design and construction for individual onshore transmission systems, making such a project very attractive. A graphic of the suggested ORM is attached.**

**\*\*\*Please see illustrative graphic below**

**Offshore Ring Main Graphic**



**Notes:**

1. Not to scale.
2. Off-shore substations on platforms as per current plans for Vanguard.
3. Minimal on-shore impact with minor NETS extensions exemplified at Walpole and Bramford or other suitable coastal substation e.g – Sizewell or Bradwell.
4. Positive impacts:
  - Minimal on-shore infrastructure impact on the environment
  - Shortened marine cable routes for developers
  - Upgrade to NETS infrastructure
  - No on-shore disruption
  - Pooled resource
  - Reduced overall costs for individual projects