

From: [REDACTED]
To: [Norfolk Boreas](#)
Subject: NORFOLK BOREAS-Oulton Parish Council's Submission at Deadline 1. Ref: 20022619
Date: 25 November 2019 12:06:13
Attachments: [BOREAS-D1- Prelim Meeting.docx](#)
[BEIS-Review of onshore grid connections.pdf](#)

OULTON PARISH COUNCIL: PINS Ref: 20022619

Dear Sir/Madam,

NORFOLK BOREAS: Oulton Parish Council's submission at Deadline 1

Please find below one part of Oulton Parish Council's submission at Deadline 1: this part of the submission relates to the Preliminary Meeting of 12th November 2019. This submission contains a written transcript of the questions and comments made by Oulton PC at the Preliminary Meeting and, in a further attachment, a copy of the letter written by George Freeman MP to the Secretary of State at BEIS on 28/10/19.

A further email will follow, which relates to this same meeting, and which will contain the pdf of the Scoping Report for the Dudgeon and Sheringham Shoal Extensions project. This Report is a rather large - and indivisible - file. The ExA requested that we submit this Report and so we would be grateful if the Case Team could alert us, should the file size cause them any problems.

Many thanks.

Regards,

Alison Shaw

pp Oulton Parish Council

Norfolk Boreas - Deadline 1 Submission

Questions / Comments from Oulton Parish Council delivered orally at the BOREAS Preliminary Meeting on 12th November 2019

Three Questions for Item 3 of the Agenda: Initial Assessment of Principal Issues.

Q1. In Annex B to the Rule 6 letter - Assessment of principal issues - Issue 3 is given as “Cumulative effects of other proposals.”

Oulton Parish Council (OPC) seeks reassurance from the Panel as to whether they are aware of the very recent submission to PINS [9/10/19] of a request for a Scoping Opinion, from a developer - EQUINOR - seeking to come ashore from the new Dudgeon and Sheringham Shoal Windfarm Extensions, and their need to cross the Boreas cable corridor during the trajectory of their own 60 km proposed onshore cable corridor?

Equinor’s project intends to submit for DCO in the final quarter of next year, and therefore there is every likelihood that, were Hornsea Three, Vattenfall (Vanguard/Boreas) and Equinor all to be granted Development Consent, then they could be engaged in onshore construction within overlapping timescales.

Even if they follow in sequence, the onshore cumulative impacts of construction will be significantly aggravated and over a longer period.

If the Panel is unaware of this development, would it be helpful if the Parish Council were to submit details of Equinor’s proposal at Deadline 1?

Post-Meeting Note:

OPC has the impression, from the comment made on the question above by a member of the ExA at the meeting, that the Panel considers it likely that the Applicant will have taken any appropriate other developments into account in its application, when considering cumulative impacts.

OPC cannot stress too highly that this is not the case. Equinor’s Dudgeon and Sheringham Shoals Extension project is in its very early stages, having only just submitted for a Scoping Opinion, and we can see no mention of it anywhere in the Norfolk Boreas Application for DCO.

OPC will submit Equinor’s Scoping Report at Deadline 1, but in a separate email, due to the size of the pdf file.

Q2. In Annex B to the rule 6 letter - Assessment of Principal Issues - Issue 5 is given as “Grid connection - to include (i) Site selection (ii) Viability of connection etc....”

In view of the central and critical importance of the National Grid’s allocation of this project’s grid connection point many miles inland across the countryside of Norfolk, and the far-reaching implications of this decision in terms of its onshore effects, Oulton Parish Council respectfully suggests to the Panel that it would be not only helpful, but essential to the Examining Authority’s proper consideration of this proposal, if they were to invite a representative of National Grid plc to attend and contribute to the discussion of onshore matters at the Issue Specific Hearing in the new year.

Q3. In the preamble to Annex B - Assessment of Principal Issues - it is stated:

“The ExA will have regard to all important and relevant matters during the Examination, and when it writes its Recommendation Report to the Secretary of State.”

In relation to 'relevant matters'...Oulton PC seeks clarification from the Panel as to whether it is aware of the recent publication of a letter written by George Freeman MP on 28th October to the then Secretary of State – The Rt. Hon. Andrea Leadsom MP - in which reference is made to her commitment, if returned after the Election, to the announcement of an offshore wind energy sector Review (and I quote) "of the potential for an Offshore Ring Main instead of the current proposal for multiple onshore cable corridors and substations across... Norfolk and Suffolk."

We would be happy to submit a copy of the full letter to the Examination, if that would be helpful, at Deadline 1.

Whatever government is returned in December, this is the current status of strategic thinking within the Energy Infrastructure Planning Dept of BEIS, which of course assists the Secretary of State - and it accurately reflects a huge and gathering momentum of public opinion throughout the Eastern Region.

It is also known, through letters received from the Project Leaders of both Orsted and Vattenfall, that neither developer is averse to this concept, but it is of course beyond their powers to construct such shared infrastructure on their own.

The issue of timing is of course a tricky one, as this application has been received and registered by PINS - and the likely BEIS Review of the grid connection arrangements has been forestalled by a General Election in extraordinary circumstances, and cannot now take place until the new year.

Let us be clear: our intention in raising this matter at the very outset is in no way an attempt to de-rail this proposal. We fully understand the nature and urgency of the climate crisis, and it is in that very spirit that we are aiming to encourage the Examination of this proposal to embrace in some way, as a Principal Issue, the possibility of an alternative to the current grid connection arrangements - partly in the hope of obviating the need for this very application to be returned to the planning process in a new format, if it is overtaken by events.

We realise this is an unorthodox suggestion to make, but we feel we would be failing in our duty if we did not bring it to your attention at the very beginning.

Oulton Parish Council would be grateful for clarification from the Panel, in due course, as to whether and in what way they can see fit to acknowledge the existence of this shift in strategic thinking, and how they can incorporate this understanding into the Examination of this current proposal, and/or into their final Report.

Post-Meeting Note:

Please find George Freeman's letter of 28th October 2019 to The Secretary of State at BEIS as a separate attachment alongside this submission.



HOUSE OF COMMONS
LONDON SW1A 0AA

The Rt Hon Andrea Leadsom MP
Secretary of State for Business, Energy and Industrial Strategy
1 Victoria St
Westminster
London
SW1H 0ET

Monday 28th October 2019

Dear Andrea,

Offshore Wind Energy off the Norfolk and Suffolk coast: rethinking a more sustainable strategy for onshore connection.

I am writing on behalf of myself, Therese Coffey MP, Suffolk Coastal, and Norman Lamb MP, North Norfolk, to thank you and your Ministers for taking the time to discuss the serious strategic policy challenges raised by the lack of an overall strategy for the connection of offshore wind infrastructure in the Southern North Sea to the National Grid in the East of England.

As discussed, over the last year it has become clear to many of us in Norfolk and Suffolk – MPs, Councils, the LEP, tourism agencies, farmers, wildlife and countryside lovers and various related agencies, and many thousands of residents – that we face a wave of potentially serious environmentally and economically disruptive onshore grid connectivity infrastructure from the otherwise welcome offshore wind farms coming to the Southern North Sea, which could be avoided through the use of an offshore ring main (ORM).

I am delighted that you have decided, in light of our representations, and the environmental commitments in the Government's flagship Environment Bill just announced in the recent Queen's Speech, to set up a proper Review of the potential for an Offshore Ring Main instead of the current proposal for multiple onshore cable corridors and substations across the Norfolk and Suffolk coasts.

This is wonderful news which will be greeted with genuine joy by all the many thousands of people who have looked on in increasing horror at the proposal for hundreds of kilometres of high voltage cabling in trenches across the Norfolk and Suffolk coasts to multiple onshore substations the size of Wembley Stadium.

Background.

As explained, in the last few years I have supported both the offshore wind generation revolution and, in my own constituency, subject to appropriate siting, screening and local

community benefit, two major sub-stations. I am 100% committed to, and supportive of, offshore wind generation as both a strategic renewable energy priority and an opportunity for the Eastern Region.

As you know, the East coast (and particularly the coast of Norfolk and Suffolk) is rapidly becoming the UK's offshore energy powerhouse, with a further three of the world's largest offshore wind farms in the pipeline off the Norfolk coast, and another three more expected off the coast of Suffolk.

In fact, the Southern North Sea is set to become the world's most concentrated cluster of offshore wind power in the world, with TEN major wind farms anticipated.

Whilst this is excellent news for the UK's energy economy, decarbonisation, reduced reliance on foreign oil and gas, and for those parts of East Anglia which benefit from involvement in the construction work, it also has serious environmental impacts on the marine, coastal and onshore habitats through which the connected infrastructure will be built, which needs to be seriously considered in choosing the right connection strategy.

Connection to the Grid.

The issue is how best to connect this strategic offshore energy to the national grid?

If just the current two proposed wind farms off the coast of Norfolk alone are given the greenlight, at least 115 kilometres of countryside will be dug up to make way for the necessary cable corridors, and two new electrical substations will be built – each the size of Wembley Stadium. Over the 11-year time period that it is estimated will be required to construct the necessary infrastructure for these three wind farms, a 3,300% increase in the number of HGV journeys will also occur, with much of this traffic being on some of the worst-affected roads in the county.

With wind farms off the Suffolk coasts now also in the pipeline, we are about to repeat this damage to some of the most environmentally precious wetland and coastal landscapes in Norfolk and Suffolk (where coastal tourism is a major part of our economies), as well as massively impact many communities along the routes of the proposed cabling.

Overall Environmental impact assessment

Whilst the environmental case for renewable energy per se is of course overwhelming, I was delighted to hear you make a point of emphasising that it does not mean that any and all renewable schemes should be “waved through” without proper regard to their overall environment impact.

I'm afraid this is how the proposed onshore connectivity of offshore wind power appears to be being handled in East Anglia. Because the developers know that it is deemed “strategic” national infrastructure in which the normal planning rules don't apply, I and others fear that a



lot of plans and proposals are being made which are NOT properly assessing the overall environmental impact.

While the Government is making fantastic and rightly welcomed strides in its moves to protect our environment (most recently in the Environment Bill 2019-20 and the legally binding commitment to the net zero target for the country's contribution to global warming by 2050), we believe that, in the eagerness to support the development of the offshore wind sector there is a real risk of inadvertently causing more damage to the vital habitats, ecosystems and fragile environments of these internationally recognised wetland coastlines.

The more that people investigate the actual process by which we have ended up in this current situation, the clearer it is that there has been no proper strategic consideration of the strategic options for bringing this scale of offshore wind infrastructure onshore. (Indeed, at no point in the past seven years has National Grid ever held a proper strategic discussion in Norfolk or Suffolk setting out the options and choices, at which the elected representatives, either at council or parliamentary level, or the general public could contribute).

It is for these reasons that I and the signatories to this letter support the exploration of an alternative way in which this offshore energy can be brought onshore.

We are delighted by the news that if/when the Government returns to office you will launch a Review into the environmental impact of the proposed connectivity plan, including specifically the replacement of the current cable & substation plan with an offshore ring main.

The Offshore Ring Main

The viability of an Offshore Ring Main (ORM) is one such alternative that a number of us believe would take away the need for multiple substations and cable corridors – protecting our countryside and avoiding the huge disruption that accompanies such construction.

This could require just two large onshore substations (with ideal locations, like Bacton in Norfolk, already being put forward) and seriously reduce the length of cabling not only onshore, but offshore also. This really does seem to be a “win-win” option.

We are aware that, in a 2015 report, National Grid and offshore energy companies considered the viability of an integrated offshore design – stating that “the project team does not believe it would be economic and efficient.” It would be interesting to see the reasoning, evidence, and numbers behind this position given the rapidly growing importance of the sector in our country. And whether that analysis stands up now to the Government's laudable commitments framed in the Environment Bill.

The Review

These are obviously all issues to be considered in the Review that you have committed to if and when the Government reassembles after the Election, and we look toward to working with you on it.

Thank you again sincerely for having taken so much time and trouble to listen to the arguments that we have set out, and to commit to a proper Review of the Options for bringing the offshore electricity onshore.

Your decision to look again at this on strategic environmental grounds is hugely welcome and will give huge hope to many who have felt that nobody in power was able to really listen and act. You have. Thank you.



George Freeman MP
Member of Parliament for Mid Norfolk

Rt. Hon Dr Therese Coffey MP
Member of Parliament for Suffolk Coastal

CC.

Rt. Hon Sir Norman Lamb MP

Chairman of LEP

ORM Campaign

Rt Hon Theresa Villiers

Rt Hon Kwasi Kwarteng MP

Nadhim Zahawi MP