From: [redacted]
To: Norfolk Boreas
Cc: [redacted]
Subject: Oulton parish Council ref:20022619/Deadline 11 submission
Date: 11 May 2020 13:07:20
Attachments: NNDC+E. Suffolk letter to SoS-13.01.20.pdf

Dear Sian Evans,
Please find below Oulton Parish Councils submission at Deadline 11 along with attachment.
Many thanks,
Regards,
Susan Mather
PP Oulton Parish Council

NORFOLK BOREAS
Oulton Parish Council's submission at Deadline 11

Oulton Parish Council (OPC) submitted a detailed summary of its remaining outstanding issues with the Norfolk Boreas proposal at Deadline 10.
Now, at this final deadline, we would like to conclude our response with some closing remarks of a more over-arching nature.
At the Preliminary Meeting in Norwich on 12/11/2019, in relation to the assessment of Principal Issues, we drew the ExA's attention to the fact that the then Secretary of State at BEIS was already considering instituting a review of the offshore wind energy sector, which would include the potential for an Offshore Ring Main (ORM) instead of the current proposals for multiple onshore cable corridors and substations across Norfolk and Suffolk.
What follows is a summary of recent developments in the advancement of that concept, all of which have occurred within the timespan of this Norfolk Boreas examination process.

1.) On 13th January 2020 a joint letter was sent by the Leaders of North Norfolk and East Suffolk District Councils to the Secretary of State at BEIS, entitled:

'Strategic planning around offshore wind developments in the southern North Sea and anticipated impacts on communities in the East Suffolk and North Norfolk local authority areas'.

This letter contains the following paragraph:

"At the heart of the significant concerns our councils have to the consenting route of the current and emerging proposals is the process of grid connection allocation, which then dictates how individual schemes are subsequently developed. A number of agencies – your Department, Ofgem, The Crown Estate, National Grid Systems Operator, National Grid Electricity Transmission and individual developers and Offshore Transmission Owners - influence the way in which offshore windfarms connect to the National Grid, but no one agency or organisation appears to take an overview to ensure the most efficient, economic and environmentally responsible approach to delivering new offshore capacity and other key new energy infrastructure proposed in an area. **This is compounded as such decisions are then presented as a fait accompli during the DCO process**." (our emphasis)

We commend the whole letter (attached below) to your serious attention, but especially the Table and map, which they include at the end. This Table summarises the project details and current planning status of no less than **20** huge energy projects already proposed that will impact on Norfolk and Suffolk over the next few years. This summary alone graphically illustrates the point that is being made over and over again by all tiers of local government and regional MPs – namely **the urgent need for strategic planning of this energy transition at central government level.**

2.) On 19th February 2020 a meeting was held between the Norfolk and Suffolk Associations of Local Councils (representing all Parish and Town Councils in both counties) to discuss this same issue. As a result, the following motion was submitted to the National Association of Local Councils (NALC):

Norfolk and Suffolk County Associations fully support the national transition to renewable energy. There is however serious concern regarding the 'in isolation' examination of Nationally Significant Infrastructure Project (NSIP) submissions to the Planning Inspectorate, given that we are experiencing numerous (5 in Norfolk and 7 in Suffolk) NSIPs in a confined geographical region and timeframe. The current onshore grid connection arrangements will entail devastating adverse impacts for many local communities and the environment. We call on NALC to lobby government, as a matter of urgency, to ask National Grid and OFGEM to demonstrate that a coordinated, strategic approach is being taken towards national energy options and that the best environmental and economic solution is being delivered for the residents of Norfolk and Suffolk (as well as all other coastal communities so affected) and the national energy need.

3.) On March 2nd 2020 George Freeman, MP for Mid-Norfolk, convened a meeting at Portcullis House in Westminster to discuss and progress this same issue. The meeting was attended by 6 MPs from Norfolk and Suffolk and 14 other people representing Parish Councils (including OPC), pressure groups and landowners. The 2-hour meeting involved a fast and free-flowing discussion with much exchange of vital information, and it gave rise to several action points. The main themes were:

the urgency of the situation, especially in Norfolk (the Secretary of State's decision on Hornsea Three and Norfolk Vanguard is now due on June 1st);

the need for political will at government level to grasp this nettle <u>now</u> and plan the whole energy transition properly;

the establishment of a working group to gather together cost/benefit analyses on alternative offshore solutions, including an ORM, to feed into an MP group who will be making direct approaches - again - to the Minister for Energy and to the Secretary of State.

The degree of unanimity of purpose in the room was striking.

The point was made forcefully by [redacted] (MP for Waveney) - who of course is eagerly anticipating the development of the port of Lowestoft in association with these offshore wind farm developments - that the current <u>onshore</u> grid connection arrangements will have such a negative impact that he fears the resulting devastation will cause the <u>whole offshore wind farm industry</u> to lose the support of the electorate - as indeed happened with *onshore* wind farms. This would be a counter-productive outcome in terms of the government's renewable energy targets.

And then the Covid-19 pandemic spread to the UK and the government's focus has been, quite naturally, elsewhere since then.

Our purpose in laying this information before you at this late stage in the Boreas examination is to enable the ExA to appraise for itself the current high profile of the concept of an ORM (or similar offshore infrastructure) and the momentum that this approach has gathered over the past year.

We would also like to make a request:

Oulton Parish Council would be grateful if the Panel could seriously consider in what way they can acknowledge the existence of this alternative and more strategic approach to the grid connection arrangements, and how they can incorporate this understanding into the examination of this current proposal, and into their final Report.

As stated at the Preliminary Meeting, 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 the possibility of a more coordinated design alternative that would also eliminate at a stroke most of the onshore devastation that would otherwise be caused.

Only the government can intervene in this situation to promote urgent discussions between BEIS, National Grid, OFGEM, the Crown Estates and the developers, regarding coordinated offshore transmission infrastructure – and the changes in the regulatory framework necessary to allow such anticipatory investment to happen.

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 Hornsea Three and Norfolk Vanguard/Boreas, followed by…the rest.**

It is, of course, an axiom of the planning process that it is only ever able to consider "the application that is put in front of it." The Panels for all these wind farm Examinations have, however, *rightly* interpreted their remit to include <u>also</u> an assessment of the cumulative impact of the *other* major projects currently going through the NSIP process. We have greatly appreciated

the approach of the Panels in their forensic examination of the combined impacts of these projects on onshore communities.
However, because of the need for a national transition to renewable energy, there will be *many more* of these projects asking for consent to dig up East Anglia *again* in the very near future.
We fully understand 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 - problems which have been relentlessly exposed during the course of this Boreas examination.
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.
There is a better - and a much 'greener' - way of doing this.

Alison Shaw

pp Oulton Parish Council
- and also on behalf of the 28 Norfolk Parish Councils listed below:

Edgefield PC
Corpusty and Saxthorpe PC
Wood Dalling PC
Cawston PC
Salle PC
Heydon Parish Meeting
Kelling PC
High Kelling PC
Mulbarton PC
Swardeston PC
Happisburgh PC
Ingworth PC
Bradenham PC
Holme Hale PC
Necton PC
Weybourne PC
Blickling PC
Aylsham Town Council
Fransham PC
East Ruston PC
Swannington, with Alderford & Lt. Witchingham PC
Garvestone, Reymerston and Thuxton PC
Great Melton PC
Brandiston Parish Meeting
Plumstead PC
Brampton with Oxnead PC
Beeston Regis PC
Morston PC

Rt Hon Andrea Leadsom MP
Secretary of State for Business,
Energy & Industrial Strategy

Email: andrea.leadsom.mp@parliament.uk

Please ask for: Philip Ridley/ Steve Blatch
Direct Dial: 01394 444432 / 01263 516232
Email: philip.ridley@eastsuffolk.gov.uk /
steve.blatch@north-norfolk.gov.uk

13 January 2020

Dear Secretary of State

Strategic planning around offshore wind developments in the southern North Sea and anticipated impacts on communities in the East Suffolk and North Norfolk local authority areas

As the Leaders of East Suffolk Council and North Norfolk District Council, we were copied into correspondence sent to you by George Freeman MP for Mid-Norfolk and Therese Coffey MP for Suffolk Coastal on 28th October 2019; highlighting the significant environmental challenges East Anglia now faces in accommodating onshore infrastructure associated with the much needed growth in offshore wind generation in the southern North Sea.

We recognise that you subsequently proposed a review of the grid connection allocation policy but respectfully suggest that any development of an Offshore Ring Main (ORM) may be at least 10 years from being able to be delivered. This is a serious concern for our two councils as both areas are, and will continue to be, subject to numerous offshore wind generation schemes seeking to access the National Grid in, or across, our districts. This will result in significant impact on communities in our areas through multiple construction programmes covering large areas impacting on agricultural and tourism businesses and causing short, if not long-term, environmental damage through removal of hedgerows, disturbance to soil structure etc in areas of high landscape character and ecological value. The letter to you from George Freeman MP and Therese Coffey MP eloquently sets out the impacts that will occur in our areas and these should not be underestimated nor, and as importantly, the strength of local feeling that is emerging against these proposals, as it appears to the communities that their voices will not be heard through DCO Examination processes given the essential need for this renewable source of power.

It is calculated that with all the offshore wind that is in place, under construction and proposed, approximately 40% of the UK's electricity (approximately equally distributed between our two councils) will be routed via onshore cable connections coming ashore through our two districts. Additionally, East Suffolk also hosts nuclear generation at Sizewell B and will be likely to host the new Sizewell C station, subject to the DCO being granted, probably later in 2021, given their current published timescales for submission.

It should also be recognised that in addition to all the clean energy cited above, North Norfolk also hosts the Bacton Gas Terminal which handles over one third of natural gas supply into the UK from domestic gas fields in the North Sea and from the Continent via interconnector pipelines. The Bacton Gas Terminal facility is critical national infrastructure for the UK energy supply and is anticipated to have a further thirty-year life, being an important element of our energy security and the UK's transition towards a zero-carbon economy by 2050.

Our two councils have, to date, positively embraced the offshore wind developments in the southern North Sea, recognising their national importance as we move towards a zero carbon energy market; and the economic opportunities and benefits they are also bringing to the regional economy in Norfolk and Suffolk - particularly in port towns such as Lowestoft and Great Yarmouth; but also in the wider supply chain across the two counties.

Notwithstanding these strategic benefits and opportunities for Suffolk and Norfolk, the number and scale of offshore wind proposals now coming forward is raising increasing concerns amongst communities in East Suffolk and North Norfolk where the impact of new landfall points, cable corridors and related infrastructure and potentially grid connections are considered to be significant such that our two councils strongly believe that we should be appropriately recognised for our significant contribution to securing the nation's future clean energy needs.

Our concerns in this regard relate to the fact that our two councils are now facing multiple offshore wind proposals, promoted by numerous energy companies, all developing their individual schemes in what appears to be an uncoordinated system, where strategic planning and cumulative impacts are not able to be properly assessed. (see attached summary of all the offshore wind schemes coming through our two council areas).

This lack of coordination is currently resulting in many of our local communities facing major programmes of engineering works required to lay many kilometres of cable runs across sensitive landscapes and the industrialisation of areas of high landscape value and sensitive / designated countryside for the development of grid connection infrastructure with no local benefit whatsoever to offset such significant impacts. These impacts are/will be compounded by the lack of quality transport infrastructure to access these relatively isolated locations by heavy plant and machinery for the whole of the lengthy construction periods.

At the heart of the significant concerns our councils have to the consenting route of the current and emerging proposals is the process of grid connection allocation which then dictates how individual schemes are subsequently developed. A number of agencies – your Department, Ofgem, The Crown Estate, National Grid Systems Operator, National Grid Electricity Transmission and individual developers and Offshore Transmission Owners - influence the way in which offshore windfarms connect to the National Grid, but no one agency or organisation appears to take an overview to ensure the most efficient, economic and environmentally responsible approach to delivering new offshore capacity and other key new energy infrastructure proposed in an area. This is compounded as such decisions are then presented as a fait accompli during the DCO process.

In seeking to highlight and address this challenge, the Deputy Leader of East Suffolk Council, Cllr Craig Rivett along with Therese Coffey MP, met with Kwarsi Kwarteng, MP and Minister of State for Energy on 16th October 2019 to highlight the cumulative impacts of the offshore wind proposals landing in just East Suffolk. He was very receptive to our concerns and asked for his civil servants to prepare a briefing note on the potential for the Offshore Ring Main and to set up a meeting with the Chief Executive of National Grid to understand the grid connection offer process in more detail. It was also confirmed at that meeting that Kwarsi Kwarteng MP was advised by civil servants that it would be at least 10 years before an economic and deliverable ORM could be in place. This places an even greater need for the review you have announced you wish to be undertaken to be commenced as soon as is practical.

In our view, the current approach to the provision of onshore infrastructure leads to significant adverse impacts on the environment and the local (usually tourism) economy where landfall is made and then the

associated substantial new buildings (required for AC transmission systems) and infrastructure required to establish the connections to the grid. These include an inability to have a long-term approach to an offshore grid, an inability to achieve efficiencies in cable routes, and inefficiency and confusion at Examination stage when several schemes are assessed independently. If this approach continues, we believe it will destroy many cherished parts of our districts, as most, if not all, of the known schemes yet to commence will be likely to be going through the DCO process in the next five years and certainly well ahead of any definite plans for an ORM as current proposals cannot be prepared in anticipation of an ORM being in place.

This significant delay to deliver a viable ORM, or have an alternative process/approach in place, will not offset the challenges we, as local authorities, now have to face with offshore wind farm operators looking to secure approval for their Development Consent Orders in the next five years. Proposals which have reached the DCO stage have been granted time limited licenses from the Crown Estate, have firm offers for connections in to the National Grid in place, with a clear remit to deliver their projects to help the UK have a secure and stable energy supply as well as meet our climate change obligations. It therefore appears to our councils that the known offshore developments will almost certainly happen, and, in making these decisions, limited weight will be given to the individual and cumulative impacts of the developments on the host communities in our respective districts. This will result in significant local harm, with huge local disruption and inconvenience to local, host communities with no mechanism to fully and properly mitigate, or compensate, for the impacts of our areas hosting at least half of the nation's essential energy infrastructure in our districts.

We would therefore welcome the opportunity to meet and discuss with you and your ministerial colleagues, the challenges we face at a local level in seeking to support the development of these major new energy projects and work with your government to develop and manage the delivery of a strategically robust approach to energy infrastructure delivery onshore in our areas. We appreciate that the currently known offshore schemes are unlikely to be delayed until a viable ORM is in place; nevertheless a strong partnership approach acknowledging the role national and local government has in embracing the opportunities these schemes can play in meeting carbon reduction targets as well as properly acknowledging the role our communities have in hosting schemes and meeting this goal would be welcomed.

Yours sincerely

Cllr Steve Gallant | Leader
East Suffolk Council

Cllr Sarah Bütikofer | Leader
North Norfolk Council

cc

Offshore Wind Farm Projects across East Suffolk / North Norfolk

Operating stage

Project	Stage	Time of operation	Operator	Output Capacity	Council Area	Other notes	Wind Farm Details
Galloper	Operational since March 2018	2038 (approx. 30-year lifespan)	innogy SE	353 MW	East Suffolk	Landfall at Sizewell O+M facility: Harwich International Port	56 x 6.3MW turbines
Greater Gabbard	Operational since September 2012	Not known	SSE	504 MW	East Suffolk	O+M facility: old Waveney fish market in Lowestoft	140 x 3.6MW turbines
Sheringham Shoal	Operational since October 2012	2032 (approx. 20-year lifespan)	Equinor	312 MW	North Norfolk	Landfall: Weybourne O+M facility: Egmere Cable corridor to Salle in Broadland District. PTVs based at Wells Harbour.	88 x 3.6MW turbines
Dudgeon	Operational since October 2017	2042 (approx. 25-year lifespan)	Equinor	402 MW	North Norfolk	Landfall: Weybourne O+M facility: Great Yarmouth. Cable corridor to Necton in Breckland District.	67 x 6MW turbines
Race Bank	Operational since February 2018	2043 (approx. 25 year lifespan)	Orsted	580 MW		O+M facility: Grimsby Landfall in the Wash Onshore Substation at Walpole. Very close to Wells-next-the-Sea with impacts for Wells fishermen etc but no direct impact on District.	91 x 6MW turbines

Construction stage

Project	Stage	Time of operation	Operator	Output Capacity	Council Area	Other notes	Wind Farm Details
East Anglia ONE	Full operation expected 2020	Expected 2050 (approx.) 30 years	SPR	714 MW	East Suffolk	Cable route Bawdsey to Bramford O+M Facility: Lowestoft Port	102 x 7MW turbines

Consented

Project	Stage	Time of operation	Operator	Output Capacity	Council Area	Other notes	Wind Farm Details
East Anglia THREE	Consented 2017	Expected 30-year lifespan	SPR	<1,400 MW	East Suffolk		110-172 x 7-12MW turbines

Projects due for/at examination

Project	Stage	Time of operation	Operator	Output Capacity	Council Area	Other notes	Wind Farm Details
East Anglia ONE NORTH	DCO examination 2020, application submitted October 2019	Expected 30-year lifespan	SPR	<800 MW	East Suffolk		67 x 12-19MW turbines
East Anglia TWO	DCO examination 2020, application submitted October 2019	Expected 30-year lifespan	SPR	<900 MW	East Suffolk		75 x 12-19 MW turbines
Hornsea Project Three	Awaiting Decision – Examining Authority issued recommendation to Secretary of State 02/07/19. Deadline for decision now 29/02/20.	Not known	Orsted	2.4 GW	North Norfolk	Landfall proposed at Weybourne. Onshore cable route to new grid connection substation at Swardeston.	300 x TBC MW turbines

Vanguard	Awaiting Decision - Examining Authority issued recommendation to Secretary of State in 10/9/19. New deadline for decision set.	Not known	Vattenfall	1.8 GW	North Norfolk	Proposed landfall at Cart Gap near Happisburgh, onshore cable route to new grid connection substation at Necton in Breckland.	90-200 x 9-20MW turbines
Boreas	Examination began 12/11/19, due to finish 12/05/20.	Expected 30-year lifespan	Vattenfall	1.8 GW	North Norfolk	Following Vanguard scheme. Landfall proposed at Cart Gap, connection at Necton.	90-257 x 7-20MW turbines
Known / emerging projects							
Project	Stage	Time of operation	Operator	Output Capacity	Council Area	Other notes	Wind Farm Details
Galloper Extension (Five Estuaries Wind Farm)	Introductory / very early	Expecting to be operational by 2030	innogy SE	<353 MW	East Suffolk	Offered grid connection at Friston, offer is under consideration Cable route, landfall location, and onshore substation not yet known Rough timeline: Commencing stakeholder engagement Nov 19-Jan 20, scoping and HRA screening Mar-Apr 20, public consultation May 20. PEI Q3 21. DCO application Q2 2022. DCO consent Q4 2023.	
Greater Gabbard Extension	Introductory / very early Q2 2023 proposed for DCO submission. National Grid will	Not known	Innogy RWE (renewables subsidiary) and SSE	<504 MW	East Suffolk		

	confirm grid offer at end of Q1 2020.						
Sheringham Shoal	Scoping report released October 2019 (joint with Dudgeon)	Not known	Equinor	Will be 800 MW, combined with Dudgeon	North Norfolk	Landfall being explored at Weybourne or between Mundesley and Bacton. Grid connection offer at Norwich Main, south Norwich. Joint development with Dudgeon, common transmission infrastructure	
Dudgeon Extension	Scoping report released October 2019 (joint with Sheringham Shoal)	Not known	Equinor	Will be 800MW, combined with Sheringham Shoal	North Norfolk	Landfall potentially Bacton/Weybourne, connection at Swardeston Joint development with Sheringham Shoal	
Race Bank Extension	Not awarded an agreement for lease following plan-level HRA	Not known	Orsted	<573 MW		Export cable through the Wash, due north of Wells-next-the-Sea, connecting to NG at Walpole Main Station. O+M base at Grimsby. Visible from North Norfolk and potential impact on North Norfolk fishermen.	

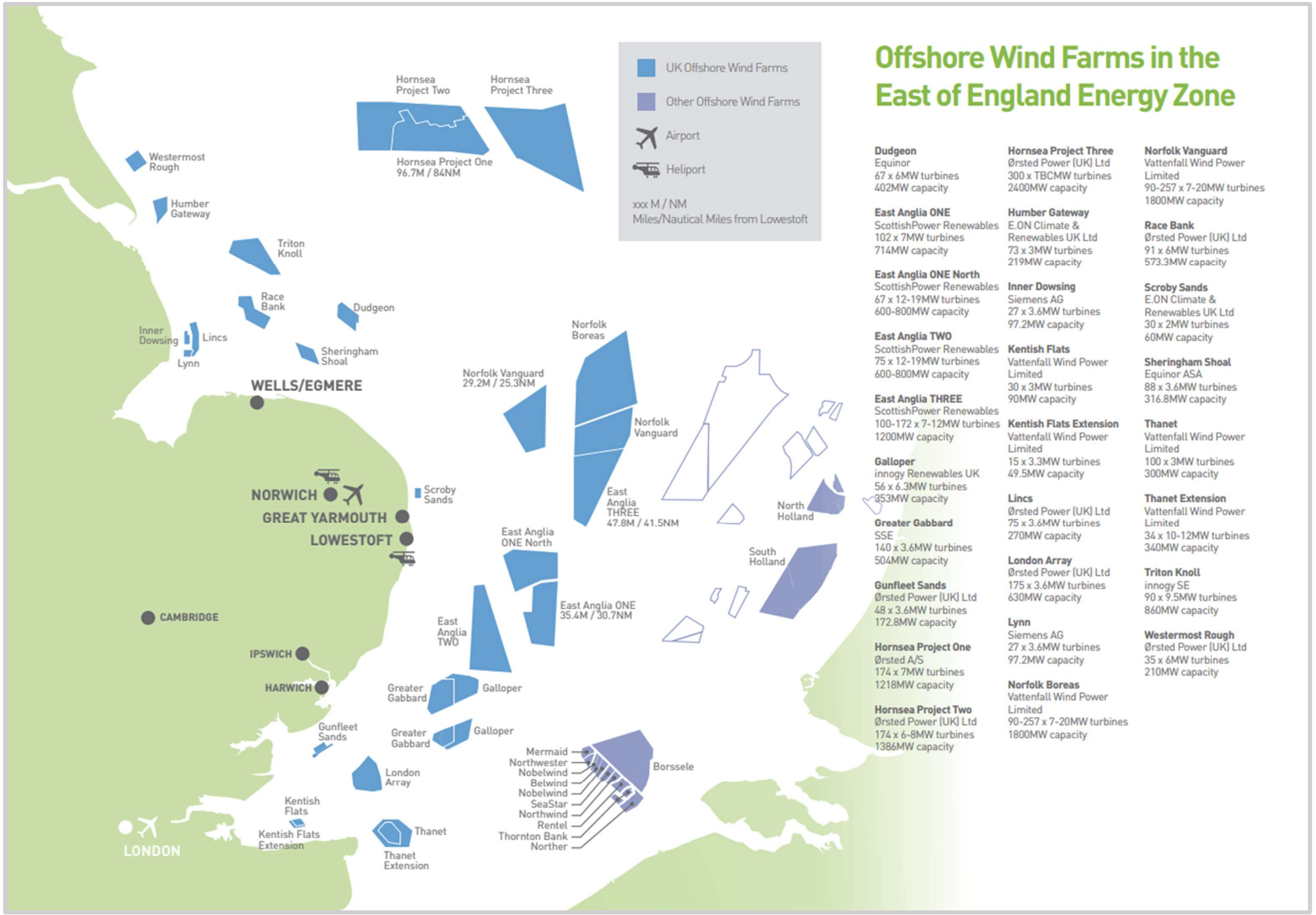
Related Projects

Project	Stage	Time of operation	Operator	Capacity	Council Area	Other notes	Details
Nautilus Interconnector	Expected DCO submission Q2 2020	Could be operational by 2028	National Grid Ventures	1500 MW	East Suffolk	Connected at Sizewell Connected to Belgium	

Eurolink Interconnector	Introductory / early		National Grid Ventures	1600 MW	East Suffolk	Connected at Sizewell Connection to Holland	

Related Projects

Project	Stage	Time of operation	Operator	Capacity	Council Area	Other notes	Details
Sizewell C	DCO application expected submission Q2 2020	Likely operation commences 2030	EDF	3340 MW	East Suffolk		Expected timeline: Construction expected to begin 2021, lasting 9-12 years



Offshore Wind Farms in the East of England Energy Zone

Dudgeon
Equinor
67 x 6MW turbines
402MW capacity

East Anglia ONE
ScottishPower Renewables
102 x 7MW turbines
714MW capacity

East Anglia ONE North
ScottishPower Renewables
67 x 12-19MW turbines
600-800MW capacity

East Anglia TWO
ScottishPower Renewables
75 x 12-19MW turbines
600-800MW capacity

East Anglia THREE
ScottishPower Renewables
100-172 x 7-12MW turbines
1200MW capacity

Galloper
innogy Renewables UK
56 x 6.3MW turbines
353MW capacity

Greater Gabbard
SSE
140 x 3.6MW turbines
504MW capacity

Gunfleet Sands
Ørsted Power (UK) Ltd
48 x 3.6MW turbines
172.8MW capacity

Hornsea Project One
Ørsted A/S
174 x 7MW turbines
1218MW capacity

Hornsea Project Two
Ørsted Power (UK) Ltd
174 x 6-8MW turbines
1386MW capacity

Hornsea Project Three
Ørsted Power (UK) Ltd
300 x TBCMW turbines
2400MW capacity

Humber Gateway
E.ON Climate & Renewables UK Ltd
73 x 3MW turbines
219MW capacity

Inner Dowsing
Siemens AG
27 x 3.6MW turbines
97.2MW capacity

Kentish Flats
Vattenfall Wind Power Limited
30 x 3MW turbines
90MW capacity

Kentish Flats Extension
Vattenfall Wind Power Limited
15 x 3.3MW turbines
49.5MW capacity

Lincs
Ørsted Power (UK) Ltd
75 x 3.6MW turbines
270MW capacity

London Array
Ørsted Power (UK) Ltd
175 x 3.6MW turbines
630MW capacity

Lynn
Siemens AG
27 x 3.6MW turbines
97.2MW capacity

Norfolk Boreas
Vattenfall Wind Power Limited
90-257 x 7-20MW turbines
1800MW capacity

Norfolk Vanguard
Vattenfall Wind Power Limited
90-257 x 7-20MW turbines
1800MW capacity

Race Bank
Ørsted Power (UK) Ltd
91 x 6MW turbines
573.3MW capacity

Scroby Sands
E.ON Climate & Renewables UK Ltd
30 x 2MW turbines
60MW capacity

Sheringham Shoal
Equinor ASA
88 x 3.6MW turbines
316.8MW capacity

Thanet
Vattenfall Wind Power Limited
100 x 3MW turbines
300MW capacity

Thanet Extension
Vattenfall Wind Power Limited
34 x 10-12MW turbines
340MW capacity

Triton Knoll
innogy SE
90 x 9.5MW turbines
860MW capacity

Westermost Rough
Ørsted Power (UK) Ltd
35 x 6MW turbines
210MW capacity