

OPEN FLOOR HEARING – 17th JANUARY 2023
Norfolk Parishes Movement for an OTN

Madam Chair, I represent the Norfolk Parishes Movement for an Offshore Transmission Network (OTN). This group represents 95 Parish Councils which object to the current proposals as set out in this DCO. The fact that we have 95 Parish Councils united in their opposition to this DCO application is unprecedented on a planning application in Norfolk. We are not here today to campaign for an OTN – though that is clearly the correct solution to this type of planning application. However, we wish to draw your attention to the strength and depth of feeling there is among the people of Norfolk about the intolerable cumulative impact arising from this DCO application. Some parishes in this group will be directly impacted for the first time but for many this is the latest in a series of disruptions to their lives and livelihoods and assaults on the environment around their communities. If this DCO is approved as sequential projects, it could be for some Parishes the 6th and 7th time* that a cable path will be dug through or very close to their community. It seems to us that this is completely unreasonable – especially considering that use of an alternative grid connection point would substantially remove these cumulative impacts.

We find it difficult to understand, with even the most cursory look at the map of these offshore windfarm extensions in relation to Norfolk, why Norwich Main was considered to be the most appropriate grid connection point. If any regard at all was given to the CUMULATIVE impact of these projects on communities in Norfolk an alternative grid connection point would have been selected. We are pleased therefore that at least the ExA will consider properly all aspects of this application, but especially the impact on local communities and the environment.

If this DCO application is approved, the 95 parishes in our group plus indeed all the parishes in Norfolk will feel the effects. The DCO application before you today, if approved, by itself would result in the removal and ultimate replacement of 100,000 tons of soil, the importation and disposal of 250,000 tons of rock for the haul roads, an increase of over 400,000 vehicle movements, often through the narrowest of country lanes, with some roads suffering an extra 1000 vehicles (mostly HGVs and LCVs) per day. The effects on woodlands, drainage of agricultural land and tourism will last for years.

The disruption to communities will be immense with impacts on real people's lives and livelihoods. In contrast to the largely desk exercise conducted by the Applicant for the Socio-Economic Impact section of their Environmental Statement, our group actually represents Norfolk people. We talk and listen to these people daily. We hear their concerns first-hand, we know the land they speak about so passionately. The owner of a smallholding in one of our parishes has explained in tears to their Parish Council that the Orsted cable path comes down one side of her property while the Equinor cables for SEP and DEP come down the other side rendering the grazing land unusable and putting her livelihood at risk. A person with special needs who seeks out a particular quiet spot in another parish which is set to be on the cable path is fearful there will not be another local peaceful spot he can relocate to locally for many months during the construction phase.

We have many similar individuals' stories we could tell but the key point is that this continuous disruption from one, after another, after another radial connection of offshore windfarms is simply intolerable. The construction phases for these projects could, with the current DCO application, extend well over a decade and coincide with the other known and possible future cabling and construction projects. We respectfully request the ExA to not condemn Norfolk to yet another unnecessary, ill-considered radial connection to Norwich Main. A grid connection at Walpole for this project must be considered.

We ask, Madam Chair, your panel to consider the cumulative impacts with the currently proposed Norfolk Vanguard and Boreas projects as well as the Hornsea Three project which is planned to follow an almost identical onshore cable path to the SEP and DEP cable path. It will not have escaped your notice that even the developers of the other already approved DCO radial

connections (Orsted and Vattenfall) have numerous concerns as submitted in their representations about the interference of the Equinor onshore cable plans with their own projects. Please also consider the cumulative impacts of the associated developments that will arise from approval of this DCO. In particular, the National Grid Electricity Transmission project East Anglia Green Energy Enablement (EA GREEN) specifically cites the Equinor SEP and DEP and Orsted Hornsea Three projects connecting into Norwich Main and the need for electricity to be sent South from Norfolk. Furthermore, electricity battery storage facilities are now being planned alongside the development of the new substation facilities in order to make best use of the power coming from the offshore projects. It seems to us essential that proper consideration is given to the impacts of these associated projects, in combination with the current DCO proposal.

As a group we support the development of offshore windfarms to provide clean energy. However, we believe this should be delivered onshore in a way that is efficient and that minimises impacts onshore for communities and the environment. In this case, the Applicant has accepted the grid connection point outcome from the CION process, seemingly without question, and neither they nor National Grid has disclosed the rationale, considerations or differential costs that have led to this conclusion. Our group has continuously engaged with the Applicant and raised our concerns about cumulative impacts and the use of an alternative grid connection point since well before the Phase 2 statutory consultation. The fact that alternative grid connection points are not even acknowledged by the Applicant, while not a surprise to us, is completely unacceptable.

Finally, Madam Chair, to add to our concern, the Applicant now proposes in effect 7 different scenarios for construction.

In some scenarios just one of the two projects may be delivered. The construction of Orsted's Hornsea 3 project and Vattenfall's Vanguard and Boreas projects can bring into Norfolk 2.4 GW and 3.6 GW respectively. Therefore, we cannot see the justification for the Applicant wanting to dig approximately the same length and width cable path with all its incumbent disruption and destruction through Norfolk for a mere 0.338 GW from SEP or 0.448 GW from DEP (scenarios 1a and 1b). The application before you could result in a mere one eighth or one tenth of the Vattenfall projects. At what point does it cease to make sense and the costs to communities and the environment outweigh the benefit of this relatively small amount of energy. We submit that this DCO application as it stands is without sense and Scenarios 1a and 1 b should be removed from the DCO.

Scenarios 1c, 3 and 4 permit digging up the cable path twice thus adding to the cumulative impacts of this DCO application. The huge cost to the environment and disruption to people's lives and livelihoods of these scenarios is simply not justified.

If the Examining Authority decides to grant this DCO, Madam Chair we maintain that it should only permit scenarios 1d and 2.

*

Dudgeon Offshore Windfarm " connects to the grid at Necton

Sheringham Shoal Offshore Windfarm " connects to the grid at Salle

Hornsea three Project " cable can be laid in two phases and will connect to grid at Norwich Main

Norfolk Vanguard and Boreas " single cable path with ducting for both projects " will connect to grid at Necton

Sheringham Shoal Extension (SEP) " will connect to grid at Norwich Main

Dudgeon Extension (DEP) " will connect to grid at Norwich Main

There remains the possibility that additional radial connections through Norfolk might, in the absence of an Offshore Transmission Network, be requested in future.