

OPEN FLOOR HEARING – 29th MARCH 2023

Norfolk Parishes Movement for an OTN

Madam Chair, I represent the Norfolk Parishes Movement for an Offshore Transmission Network (OTN). I would like to make two points:

1. Scenarios

Throughout this application process, the Applicant has sought to present itself, by bringing forward these projects, as a developer that:

- is heroically responding to government targets
- is going to deliver vital electricity to the UK grid
- has no option but to propose a variety of development scenarios, and
- is concerned for the environment and communities.

Firstly, the Applicant has included in their dDCO a variety of construction scenarios with best case (i.e., both SEP and DEP constructed) 0.786 GW and worst case (i.e., just SEP constructed) 0.338 GW of generating capacity. The projected UK requirement for electricity generating capacity in the UK by 2025 is at least 113 GW according to NPS EN-1. Therefore, in the best case these projects would deliver less than one third of one per cent of the UK energy requirement and in the worst case, with just SEP constructed, that figure falls to one eighth of one percent. These projects can hardly be considered as vital for the UK. On the other hand, the cost to Norfolk, to the environment, businesses and communities will be completely disproportionate, in either case, due to the cumulative impacts with other offshore windfarm developments.

Secondly, the Applicant has brought forward these projects in the full knowledge that, unless Ofgem could be persuaded otherwise, there would be a need for separate Contracts for Difference with granting at different bidding rounds. They have accepted the risk on this but have failed to persuade Ofgem to change the current arrangements. The Applicant has also used different consortia of investors for each of the two projects. But they did not have to fund the projects this way. They clearly understand the complexity this brings to delivery of the projects, but they have failed to resolve the issue. In addition, the Applicant has failed to get agreement on anticipatory investment and ensure both consortia work together for the construction phases. The result is they now seek approval for seven different construction scenarios to accommodate the flexibility they claim to need. So, the Examining Authority is being asked to decide the planning balance for projects for which the total amount of energy they will bring in, the construction timeframe, the construction plans (concurrent or sequential) and the environmental and community impacts are all uncertain.

The Applicant seeks to transpose **their** problems, which arise from **their** failures, onto others by laying them before the Examining Authority expecting that you will be persuaded to agree the DCO as it stands. If they succeed Madam Chair, it will be the landowners, businesses and residents in Norfolk who will have to pay the price.

If the Examining Authority does decide to recommend consent for this DCO, we maintain that it should only permit concurrent construction of SEP and DEP or “scenario 2”, which allows sequential construction, but whichever project starts first installs the ducts for the second project.

2. Alternative Grid Connection Point (GCP)

The Applicant repeatedly claims the selection of Norwich Main as the GCP was made by NG ESO and implies that they were merely a passive participant in the CION process with little control over it. In fact, the preferred option of the developer is taken into consideration from the start of the CION process. The applicant is responsible for providing high level appraisals of technical, environmental, planning consent and deliverability issues. In order to select the overall preferred connection option, the parties evaluate these issues for each connection option and the Applicant has considerable influence over the final preferred option. In effect, it is a joint decision. Furthermore, the Applicant does not have to accept the CION offer – it can choose to accept, to decline or to refer the offer to Ofgem for determination.

The CION offer is not fixed and can be amended at the request of one of the signatories, virtually until the start of construction. The Applicant, in response to numerous calls from communities to go back and consider a different GCP, has steadfastly refused to do so.

The Applicant has accepted the CION offer, but it **did**, and it still **does** have a choice in this matter. Therefore, it is quite incorrect for the Applicant to claim that section 4.4.2 of NPS EN-1 does not apply.

As you are aware, not only is consideration of alternatives a requirement of the National Policy Statement, but it is also a requirement of the EIA regulations and indeed the Planning inspectorate's own Advice Note 7 requires this.

The Norfolk Parishes Movement continues to investigate and advocate connection of the SEP and DEP projects at the Walpole substation. We have found no insurmountable technical or engineering reason why the Walpole GCP could not be used and crucially it has the distinct advantage of removing most of the cumulative impacts for businesses, landowners and communities.

Consideration of an alternative GCP is particularly applicable in this case because of the cumulative impacts with other NSIPs. We need an open discussion of these matters so that everyone can understand the relative merits of the options for the GCP. Perhaps the Examining Authority could ask the Applicant to enquire of each of the parties to the CION agreement whether they are prepared to share the relevant information from the CION offer?

Thank you.