



Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects

Supplementary Information to the Scenarios Statement

Revision A

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**Sheringham Shoal and Dudgeon Offshore
Wind Farm Extension Projects**
Supplementary Information to the Scenarios
Statement

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Glossary of Acronyms

AfL	Agreement for Lease
BDC	Broadlands District Council
BEIS	Department for Business, Energy and Industrial Strategy
CNP	Critical National Priority
DCO	Development Consent Order
DEL	Dudgeon Extension Limited
DEP	Dudgeon Offshore Wind Farm Extension Project
DESNZ	Department for Energy Security and Net Zero
DOW	Dudgeon Offshore Wind Farm
EIA	Environmental Impact Assessment
ES	Environmental Statement
ExA	Examining Authority
HDD	Horizontal Directional Drilling
HGV	Heavy Goods Vehicle
HND	Holistic Network Design
ISH	Issue Specific Hearing
MW	Megawatts
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
Ofgem	Office of Gas and Electricity Markets
OTNR	Offshore Transmission Network Review
PEIR	Preliminary Environmental Information Report
SEL	Scira Extension Limited
SEP	Sheringham Shoal Offshore Wind Farm Extension Project
SoCG	Statement of Common Ground
SoS	Secretary of State
SOW	Sheringham Shoal Offshore Wind Farm
TCE	The Crown Estate

Glossary of Terms

DCO Application	An Application for Development Consent, specifically relating to the SEP and DEP DCO Application, as submitted to the Planning Inspectorate on 05 September 2022.
Dudgeon Offshore Wind Farm Extension Project (DEP)	The Dudgeon Offshore Wind Farm Extension onshore and offshore sites including all onshore and offshore infrastructure.
Dudgeon Offshore Wind Farm (DOW)	The existing wind farm, of which DEP is an extension.
Integrated Grid Option	Transmission infrastructure which serves both extension projects.
Landfall	The point at the coastline at which the offshore export cables are brought onshore and connected to the onshore export cables.
Onshore cable corridor	The area between the landfall and the onshore substation sites, within which the onshore cable circuits will be installed along with other temporary works for construction.
Onshore substation	Compound containing electrical equipment to enable connection to the National Grid.
Order Limits	The area subject to the DCO Application, including all permanent and temporary works for SEP and DEP.
Sheringham Shoal Offshore Wind Farm Extension Project (SEP)	The Sheringham Shoal Offshore Wind Farm Extension onshore and offshore sites including all onshore and offshore infrastructure.
Sheringham Shoal Offshore Wind Farm (SOW)	The existing wind farm, of which SEP is an extension.
The Applicant	Equinor New Energy Limited. Equinor New Energy Limited. As the owners of SEP and DEP, Scira Extension Limited and Dudgeon Extension Limited are the named undertakers that have the benefit of the DCO. References in this document to obligations on, or commitments by, 'the Applicant' are given on behalf of SEL and DEL as the undertakers of SEP and DEP.

Executive Summary

1. The Applicant prepared the **Scenarios Statement** [APP-034] to provide an overview and explanation of the project development scenarios within the Development Consent Order (DCO) Application for the proposed Sheringham Shoal Offshore Wind Farm Extension Project (SEP) and Dudgeon Offshore Wind Farm Extension Project (DEP).
2. Subsequently, the Applicant has provided further information and justification related to the need for the project development scenarios, and how they have been accommodated with the Environmental Impact Assessment (EIA), the Draft DCO [REP2-008] and associated DCO application documents.
3. The Applicant has recognised throughout that there is a preference from the local community and other statutory and non-statutory stakeholders for the two projects to be delivered concurrently. The Applicant's preference and ambition are entirely aligned with this view, however it has been made clear that it is not in a position to guarantee that outcome at this time for reasons already presented in the **Scenarios Statement** [APP-314] and into the examination.
4. The Applicant reiterates the following relevant features of the SEP and DEP DCO application and the strategy taken to date:
 - The Applicant took a strategic approach to developing the two projects together before the Offshore Transmission Network Review (OTNR) was initiated by Government;
 - The Applicant was encouraged by the Planning Inspectorate (and other key stakeholders) to apply for both projects together in one DCO application;
 - The Applicant has put significant time and resource into lobbying Ofgem, BEIS (now DESNZ), and National Grid to realise the regulatory changes required to guarantee concurrent delivery of the two projects;
 - The approach and structure of the draft DCO is not novel. The **Scenarios Statement** [APP-314] sets out various examples of where a similar approach has been taken elsewhere, and accepted by the Secretary of State;
 - The only novel feature of the SEP and DEP draft DCO is the ability to deliver an integrated transmission system (which would be a first of a kind, and is an approach which has led to Ministers awarding the projects 'Pathfinder' status);
 - Irrespective of future regulatory outcomes, the Applicant has committed to delivering the two projects in a coordinated way – the Order Limits are not wide enough to allow each project to be constructed entirely independently of the other without any commercial collaboration. Collaboration between the two projects will be necessary under any given project development scenario, including options under scenario 1; and
 - In most scenarios, there will be a need to have shared works and/or extensive collaboration as further set out in this document.

5. The EIA demonstrates that the Projects, delivered either sequentially or concurrently, have very limited impacts during construction with the vast majority of topics assessed within the ES reporting that, in the worst-case scenario there are no significant effects in EIA terms. Of the very few effects that are reported, the Applicant has carefully considered mitigation both by design (embedded mitigation through, for example, site selection) and additional mitigation to be delivered through appropriate construction management. Further there is no discernible difference in EIA terms between options under Scenario 1 (namely Scenario 1(c) and Scenario 1(d)) and Scenario 3, for reasons explained in this document.
6. The status of the Statements of Common Ground with each of the relevant local authorities demonstrates good support for the principle of the development, agreement to the robustness of the EIA, and that the proposed mitigation will be adequate to control any construction phase impacts.
7. The project development scenarios and the DCO application as made must be considered within the wider industry and regulatory landscape and in a commercial context.
8. The need for each project is supported by designated national policy, and reinforced by the new consultation draft national policy published in March 2023 which places offshore wind generation projects in a new and additional category of “Critical National Policy”. Further, the March 2023 consultation draft national policy makes clear that “*The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS*” (paragraph 3.2.7 draft EN-1).
9. The Applicant considers that a very limited number of temporary construction impacts do not outweigh the need for SEP, or for DEP, when considered in the planning balance pursuant to section 14 of the Planning Act 2008.
10. A decision to grant consent excluding some or all of the options under Scenario 1 would impose an unjustified and unprecedented restriction on the ability to deliver the two Projects. The Applicant submits this cannot be justified pursuant to section 104(7) in the light of the adverse impact which the Examining Authority (ExA) references in Q2.6.1.1. The Applicant respectfully declines to provide documentation in response to Q2.6.1.1 which could facilitate that outcome and asks that the application is examined as submitted and granted or refused on that basis.

1 Introduction

1.1 Overview

11. The Applicant notes the questions posed during Issue Specific Hearing (ISH) 4 on 23 March 2023 (see **The Applicant's Oral Summary of Issue Specific Hearing 4** (document reference 16.9)), and the Examining Authority's (ExA's) subsequent second written questions relating to the project development scenarios.
12. In order to aid the ExA's further understanding of the project development scenarios, the Applicant is providing this document as a supplement to the **Scenarios Statement** [APP-314].
13. **Table 1.1** sets out the relevant application, pre-examination and examination documents that are already before the ExA, and that are relevant to the matter of project development scenarios. This document draws upon information already submitted within those documents, and seeks to provide further clarity and / or information which may assist the ExA.

Table 1-1 Submissions made by the Applicant relating to the project development scenarios

Document	Document Library Number	Deadline
9.28 Scenarios Statement	APP-314	DCO Application
6.1.4 Environmental Statement Chapter 4 - Project Description	APP-090	DCO Application
9.1 Planning Statement	APP-285	DCO Application
Procedural Deadline A Submission - 11.2 Response to ExA Request for a table of the anticipated adverse effects for each proposed scenario	PDA-002	Procedural Deadline A
Procedural Deadline A Submission - 9.28.1 Supplementary Figures to Scenarios Statement	PDA-005	Procedural Deadline A
12.4 The Applicant's Responses to the Examining Authority's First Written Questions	REP1-036	Deadline 1
12.1 Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 1	REP1-031	Deadline 1
12.2 Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 2	REP1-032	Deadline 1
16.8 Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 3	TBC	Deadline 3
16.9 Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 4	TBC	Deadline 3
16.12 Written Summary of the Applicant's Oral Submissions at Compulsory Acquisition Hearing 1	TBC	Deadline 3
9.28.2 Supplementary Information to the Scenarios Statement	TBC	Deadline 3

14. The Examining Authority's Second Written Questions [PD-012] include the following:

Q2.6.1.1

Possible Conclusion in line with s104(7) of the PA2008

- a) *In light of several representations [too numerous to list] regarding the adverse effects on onshore communities, and the assessed adverse onshore and offshore construction stage effects and cumulative effects in the ES [too numerous to list], Applicant comment on the possibility that post Examination, the ExA finds that the balance of the evidence in Examination does not demonstrate that the adverse impact of some or all of the options under Scenario 1 of the Proposed Development would outweigh its benefits, in line with s104(7) of the PA2008.*

The ExA is interested to explore options that may be available to the SoS, including a decision which supports granting consent for all development scenarios except some or all of the options under Scenario 1. In order to examine this option, the Applicant is requested to provide the following information:

- b) *a summary of the implications in terms of the assessment of need, viability and deliverability, of an Order being made that grants development consent for all scenarios, except some or all of the options under Scenario 1;*
- c) *whether information provided thus far, particularly in the ES is sufficient for the assessment of significant adverse effects, especially highlighting any areas where the worst case scenario might be worse with the removal of Scenario 1;*
- d) *what information, particularly in the certified documents, would need to be updated to support this approach;*
- e) *what modifications would be required to the dDCO, if the Applicant can provide without prejudice a version of the dDCO to support this approach, and by when; and*
- f) *what modifications would be required to the Land Plans, Crown Land Plans and Special Category Land Plans, if the Applicant can provide without prejudice a version of the plans to support this approach, and by when.*

Q2.6.1.2

Potential for Greater Impacts

- a) *Are there any controls in the Works Plans and provisions in the dDCO that would not allow for SEP and DEP to be constructed wholly separately but concurrently.*
- b) *Provide evidence to demonstrate whether SEP and DEP, if developed wholly separately but concurrently, would not result in greater effects than those assessed in the ES.*

15. The Applicant has considered the ExA's line of questioning relating to the project development scenarios and has sought to address the main themes that have arisen. This document is structured to reflect those main themes as follows:

- Mechanics of, and justification (or otherwise) for, excluding some or all of the options under Scenario 1 from the consent (see **Section 2**, and **Section 3**);

- Scenario 1(d) and ‘absolute separation’ of the two projects (see **Section 3**);
 - Completeness and robustness of the ES (see **Section 4.1**);
 - Construction Effects from SEP and DEP together (see **Section 4.2**);
 - Cumulative Effects from SEP and DEP with other infrastructure projects (including other offshore wind farm developments in Norfolk) (see **Section 4.3**).
16. This document aims to provide sufficient information to respond to written questions Q2.6.1.1 and Q2.6.1.2; and to also draw together information which relates to various other linked points that have been raised during the examination so far. It should be noted that many of the points in Sections 2 – 6 are interlinked and therefore the document should be considered as a whole, alongside the **Scenarios Statement** [APP-314].

2 Legislation and Policy

2.1 Law and Policy Relating to Grant of “materially different” DCOs

17. Under section 114(1) Planning Act 2008, the Secretary of State must either grant or refuse the development consent order as submitted. Under section 114(2), there is provision for regulations to provide for the procedure to be followed if the Secretary of State proposes to make an order granting development consent on terms which are materially different from those proposed within the application. No such regulations have been made. The Applicant considers that the Secretary of State has such a power, absent such regulations, but it is clear from the existence of this provision that this is regarded as a substantial matter.
18. The removal of one or more options forming part of Scenario 1 would, in the Applicant’s view, involve such a material difference to the application submitted. It is one thing for an applicant to propose a change of this kind to a live application. It is very different for an ExA to expect an applicant to potentially facilitate such a change, through a request for submission of extensive further documentation and analysis to the Examination. The extent of the further documentation requested, and the considerable work involved in providing it, is considered further in **Section 4**.
19. The Applicant’s reading of Chapter 4 of the Planning Act 2008 and the Infrastructure Planning (Examination Procedure) Rules 2010 and the Examination Guidance (March 2015) is that it is the role of the ExA to examine the application as submitted. The consideration of the application in the terms envisaged in the Examining Authority’s Second Written Questions [PD-012] Q2.6.1.1 would only be appropriate if the applicant was agreeable to this approach. As indicated at ISH 1, when this subject was raised by the ExA, the Applicant explained that it had given careful consideration to the different scenarios sought in the application (as explained in the **Scenarios Statement** [APP-314]) and it seeks development consent in the terms applied for (REP1-032, ID3i(E)).
20. In short, the Applicant continues to request that the application is determined on the basis of the scenarios in the submitted DCO application and it respectfully declines to provide the information requested in Q2.6.1.1 (b) to (f) on the basis that it is not required for the adequate examination of the application that is before the ExA.

2.2 Section 104(7) Planning Act 2008

21. The ExA has referred to section 104(7) in Q2.6.1.1. For convenience, the Applicant sets out section 104 of the Planning Act 2008, which governs the basis on which a decision is made by the Secretary of State where a relevant national policy statement has effect:

104 Decisions in cases where national policy statement has effect

(1) This section applies in relation to an application for an order granting development consent if a national policy statement has effect in relation to development of the description to which the application relates.

(2) In deciding the application the Secretary of State must have regard to—

(a) any national policy statement which has effect in relation to development of the description to which the application relates (a “relevant national policy statement”),

(a)(a) the appropriate marine policy document (if any), determined in accordance with section 59 of the Marine and Coastal Access Act 2009,

(b) any local impact report (within the meaning given by section 60(3)) submitted to the Secretary of State before the deadline specified in a notice under section 60(2),

(c) any matters prescribed in relation to development of the description to which the application relates, and

(d) any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State’s decision.

(3) The Secretary of State must decide the application in accordance with any relevant national policy statement, except to the extent that one or more of subsections (4) to (8) applies.

(4) This subsection applies if the Secretary of State is satisfied that deciding the application in accordance with any relevant national policy statement would lead to the United Kingdom being in breach of any of its international obligations.

(5) This subsection applies if the Secretary of State is satisfied that deciding the application in accordance with any relevant national policy statement would lead to the Secretary of State being in breach of any duty imposed on it by or under any enactment.

(6) This subsection applies if the Secretary of State is satisfied that deciding the application in accordance with any relevant national policy statement would be unlawful by virtue of any enactment.

(7) This subsection applies if the Secretary of State is satisfied that the adverse impact of the proposed development would outweigh its benefits.

(8) This subsection applies if the Secretary of State is satisfied that any condition prescribed for deciding an application otherwise than in accordance with a national policy statement is met.

(9) For the avoidance of doubt, the fact that any relevant national policy statement identifies a location as suitable (or potentially suitable) for a particular description of development does not prevent one or more of subsections (4) to (8) from applying.

22. The Applicant has set out in the **Planning Statement** [APP-285] the operation of section 104 in relation to the Application. It maintains its position that the DCO application is “in accordance” with the relevant designated NPSs i.e. EN-1, EN-3 and EN-5. This is reinforced by the March 2023 consultation draft NPSs for EN-1, EN-3 and EN-5, which will be an “*important and relevant*” consideration for the Secretary of State when determining this application and which will, by that time, have been formally designated, subject to any final changes from the current drafts. The Applicant is undertaking a full review of the revised draft NPSs and will provide a response in the form of an Addendum to the Planning Statement at Deadline 4.
23. The Applicant acknowledges that section 104(7) provides for the possibility that an application which is in accordance with the relevant NPSs pursuant to section 104(3) could, in theory, nevertheless be refused as a result of the “*adverse impact of the proposed development*”. The structure of section 104 is very clear in that it requires consideration of compliance with the relevant NPSs before consideration of section 104(7) as a possible exception. Section 104(3) does not allow the application of an unconstrained planning balance.

24. The Applicant would make the following further observations about the ExA's contemplation of a recommendation that inclusion of one or more options within Scenario 1 in the DCO could justify a refusal of the application pursuant to section 104(7):

- Where an application is “in accordance” with the relevant NPSs, the adverse effects involved would have to be wholly exceptional. Otherwise, the centrality of compliance with the NPSs provided for under section 104 would be undermined.
- The “adverse impact” which this section anticipates would, in practice, the Applicant submits, normally be expected to relate to the permanent operational impacts of the proposed development. This could not apply here as the operational impacts are materially the same regardless of which project development scenario SEP and DEP are constructed under.
- The only remaining “adverse impact” is that from temporary construction impacts of the proposed development. The Applicant submits that it is hard to contemplate a situation where such temporary construction effects of a proposed development of this type (underground cables) could justify its refusal on a ‘project alone’ basis, where the route selection is not being questioned. The starting point for considering such a wholly exceptional decision would be the assessment of construction effects in the ES. These assessments are summarised in [Section 4.2](#). The mitigations and controls in place to control the relevant impacts are also summarised in [Section 4.3](#). The mitigations proposed for these impacts follow established precedents from multiple equivalent underground grid connection schemes for offshore wind, interconnectors and other projects. The Applicant submits that the nature and extent of the impacts identified could not reasonably be regarded as exceptional within the terms required under section 104(7).
- It is even harder to contemplate a situation where temporary construction effects on a cumulative basis with other schemes in development could justify its refusal. This is particularly because an applicant has no control over the nature and timing of other schemes, nor the terms on which they may be granted consent concerning mitigation which would have a direct bearing on a potential cumulative effect. Again, the starting point for considering such a decision would be the cumulative construction effects assessments, which are also summarised at [Section 4.3](#). Again, the mitigations proposed follow established precedents. The Applicant submits that the nature and extent of the impacts identified could not reasonably be regarded as exceptional within the terms required under section 104(7).
- In the light of these points, the Applicant would strongly question whether the projects could be lawfully refused pursuant to section 104(7) on the basis the ExA appears to be contemplating (temporary construction impacts).

2.3 Government Policy Relevant to Coordination

2.3.1 Designated NPSs

25. Policy established in the designated NPSs does not require coordination of the delivery or connection arrangements for separate offshore windfarms.
26. The only reference in the designated NPS EN-1 to coordinated connection arrangements is the explanation (paragraph 3.7.1) of the national Electricity Systems Operator's (ESO) publication of an annual statement on the issue, which it describes as:

“an annual Offshore Development Information Statement, which presents potential scenarios and NETSO’s best view of the development of the transmission network offshore to help ensure a coordinated and informed approach to the offshore transmission network”.
27. NPS for Electricity Networks Infrastructure EN-5, in the section on policy allowing for wind farms and connections to be connected separately also makes clear that:

“It may also be relevant that the networks application and a related generating station application are likely to come from two different legal entities, or be subject to different commercial and regulatory frameworks”.
28. It follows therefore that designated NPS policy supports applications like SEP and DEP, with respective ownership by separate legal entities, irrespective of retaining the ability, as set out in the **Scenarios Statement** [APP-314], to bring forward either Extension Project included in the application on its own, if necessary.
29. SEP and DEP also accord with designated NPS policy relating to coordination (and minimisation of impacts generally) by combining the two requirements for offshore export cable corridors, landfalls, onshore export cable corridors and onshore substations for both windfarm extensions into the same shared location in each case and under all project development scenarios set out above.

2.3.2 Current Consultation Draft NPSs

30. Coordination of offshore windfarm connections is raised in the recently published revised draft NPSs EN-1, EN-3 and EN-5 (March 2023). As already noted, it is assumed that these will be designated by the time the application is determined (potentially with some changes) and will be *“important and relevant”* matters under section 104(2). Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant new offshore wind infrastructure (and supporting onshore and offshore network infrastructure).
31. As already noted, the Applicant will provide a response in the form of an Addendum to the Planning Statement at Deadline 4 to set out compliance with the consultation draft NPSs. For the purposes of this document, the Applicant would highlight that in terms of the need for offshore wind, the new draft EN-1 states that *“Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant new offshore wind infrastructure (and supporting onshore and offshore network infrastructure)”* (paragraph 3.3.59). It also makes it clear that *“The*

Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS” (paragraph 3.2.7 draft EN-1).

32. This sets the need context for the delivery by the Applicant of the projects. To restrict the Applicant’s ability to deliver the projects by seeking to impose restrictions by removing one or more options from Scenario 1 would be inconsistent with delivering the projects in accordance with this critical national priority.
33. In terms of the specific policy in draft EN-3 on grid coordination, the new NPS reflects the different strands within the Offshore Transmission Network review (considered in the next section). SEP and DEP are entirely consistent with the emerging NPS policy applicable to Early Opportunities projects and, as already noted, brought forward grid co-ordination proposals before the OTNR had been launched.

2.3.3 Offshore Transmission Network Review

34. As explained in the **Scenarios Statement** [APP-314], the Offshore Transmission Network Review (OTNR) was launched in July 2020 to ensure that transmission connections for offshore wind generation can be delivered to support the UK Government’s ambitions to increase offshore wind power to 50GW by 2030 and to deliver on its Net Zero ambitions. It is essential to understand that the OTNR is following a multi-stranded approach in relation to different categories of offshore project, depending on the timeline of each project. SEP and DEP necessarily fell into the category (Early Opportunities/Pathfinder) which had least general opportunity for co-ordination because they were so far advanced when the OTNR was launched. This multi-stranded approach is reflected in the March 2023 consultation draft of EN-5.
35. As explained in the **Scenarios Statement** [APP-314], the Applicant had, however, already committed to co-ordination between SEP and DEP, prior to the launch of the OTNR and the September 2021 drafts of the Energy NPSs. The Applicant went on to seek ‘Pathfinder’ status as part of the Early Opportunities strand of OTNR. This is evidenced by the letter from The Rt Hon Greg Hands MP, Minister of State for Energy, Clean Growth and Climate Change to Equinor’s Senior Vice-President of North Sea Renewables dated 29 June 2022 (‘the award of Pathfinder status letter’) (**Appendix A**). SEP and DEP is a coordinated project in the terms of the OTNR and by coordinating two windfarm extensions into a single project is maximising the potential for coordination of the aspects of the project under the Applicant’s control.
36. The Minister’s letter states: “[t]he concept of Pathfinder projects was created for such projects that are leading the way in utilising the enabling regulatory and policy changes being developed by project partners to meet the OTNR objectives. Having reviewed this proposal, I am encouraged by the degree of coordination being pursued and look forward to applying the learnings from delivering this project to the wider OTNR.”

37. The various strands of the OTNR have played out since July 2020 and it is important to be clear which is relevant to SEP and DEP and which is not.
38. In particular, the Holistic Network Design (HND) process is not relevant to SEP and DEP. There is no HND-related process which SEP and DEP is part of, or required to be part of, which could lead to the re-opening of the connection agreement for SEP and DEP or a requirement to construct the projects in a single build programme (i.e concurrently).
39. The Applicant would reiterate its core submission in the **Scenarios Statement** [APP-314] that, in terms of grid coordination policy, the application is a 'Pathfinder' in coordination principally because it:
 - coordinates two offshore windfarm projects, which come under separate ownerships, into a single DCO application;
 - aligns the two export cable systems serving the two windfarm extension projects into a single coordinated:
 - offshore and onshore export cable corridor;
 - landfall; and
 - onshore substation location, and
 - provides for the possibility for the integrated transmission system, and for coordinated and/or concurrent construction of the works serving both windfarm extension projects (whilst the integrated transmission system constructed concurrently is the Applicant's preferred outcome, this cannot be guaranteed for the reasons explained in the **Scenarios Statement** [APP-314]).
40. The coordination of both extension projects into the same application, despite the differing ownerships involved, is significant because had the extension projects been applied for separately and developed on different timescales, the connection points offered may have been different, leading, in particular, to an additional, second onshore cable route corridor to serve the windfarm extension coming forward at the latest date.

3 Development Scenarios

41. The Examining Authority's Second Written Questions [PD-012] Q2.6.1.2 follows up on discussions at Issue Specific Hearing 4 where the ExA questioned whether the definition of scenario 1(d) of the draft DCO provides for the two projects to be constructed separately but concurrently. The Applicant explained at ISH 4 that in the event that SEP and DEP were constructed concurrently (under scenario 1(d)) there would need to be a significant degree of coordination between the projects. This was made clear in section 8.3 of the **Scenarios Statement** [APP-314] which states that *"...there will need to be collaboration between the two Projects to optimise construction logistics and to share certain temporary works such as the haul road and construction compounds. **This applies to a concurrent build, or may apply to a sequential build if there is an overlap in construction programmes, regardless of whether the transmission systems are integrated...**"* [emphasis added].
42. The drafting of the scenarios definitions and the works descriptions in Schedule 1 have been carefully considered by the Applicant such that the **Draft DCO (Revision F)** [document reference 3.1] ensures that SEP and DEP would need to coordinate and does not allow for SEP and DEP to be constructed wholly separately but concurrently or put another way, it would not be possible for SEP and DEP to undertake concurrent construction of the onshore cable corridor acting as wholly independent projects ('absolute separation' as described by the ExA at ISH 4). This is explained in more detail in the following paragraphs by reference to the relevant definitions.
43. In Article 2 of the **Draft DCO (Revision F)** [document reference 3.1] 'Scenario 1' means *'each generating station would be constructed separately in any one of the following ways:-...(d) concurrent construction of the Sheringham Shoal Extension Project and the Dudgeon Extension Project'*. So, whilst on the face of it, the definition of scenario 1 refers to 'separate' construction of each project in the concurrent scenario 1(d), this has to be read in the context of what the Sheringham Shoal Extension Project and the Dudgeon Extension Project mean in that scenario. The reference to 'separate' in the scenario 1 definition was included as a contrast to the concept of the integrated transmission system which is provided for under scenarios 3 and 4. In reality, reference to the word 'separate' in the scenario 1 definition could be removed and this would not change what can be delivered under the draft DCO in accordance with the works descriptions in Schedule 1 and the Works Plans.
44. Article 2 of the **Draft DCO (Revision F)** [document reference 3.1] includes the following definitions which must be read alongside the scenarios definitions:
 - 'Sheringham Shoal Extension Project' means 'the Sheringham Shoal Extension Project onshore works and the Sheringham Shoal Extension Project offshore works' [emphasis added]

- 'Dudgeon Extension Project' means 'the Dudgeon Extension Project onshore works and the Dudgeon Extension Project offshore works' [emphasis added]
 - 'Sheringham Shoal Extension Project onshore works' means '(a) in the event of scenario 1 or scenario 2, 8A to 22A and any other authorised development associated with those works'
 - 'Dudgeon Extension Project onshore works' means '(a) in the event of scenario 1 or scenario 2, 8B to 22B and any other authorised development associated with those works.'
45. As set out above, the overall definition of each project is refined down to the meaning of each project's onshore and offshore works and then the onshore works for each project are defined for each scenario by reference to the works descriptions in Schedule 1 of the draft DCO. When read together as intended, it is clear that the scenarios definitions are inextricably linked to the definition of each project and through that to the works descriptions. The extent to which concurrent construction can take place is therefore limited by the relevant works descriptions and the order limits shown on the accompanying works plans. Consequently, as noted by the Applicant at ISH 4, by the nature of what is included within the works descriptions there has to be a level of coordination to implement those projects in concurrent scenario 1(d). This position is reiterated and explained further in section 8 of the **Scenarios Statement** [APP-314] at paragraph 89. Furthermore, paragraphs 102 and 103 of the **Scenarios Statement** [APP-314] highlight that:
- "It is anticipated that shared works will be required to enable two sets of contractors to construct within the Order Limits at the same time. The Onshore Works Plans [document reference 2.6] and description of the onshore works in the **draft DCO** [document reference 3.1] together show that the SEP onshore 'A' works and DEP onshore 'B' works overlap (e.g. there is no centre line along the middle of the onshore export cable corridor, as has been the approach on previous DCOs that have granted consent for two offshore wind farm projects within one DCO (Dogger Bank Teesside A and B Offshore Wind Farm Order 20151)). Coordination would therefore be required to enable all works to take place concurrently within the Order Limits.*
- A Cooperation Agreement between SEL and DEL will govern the necessary cooperation between the two projects".*
46. Paragraph 14 of **Chapter 4 Project Description** [document reference 6.1.4] also highlights that:
- 'In the concurrent development scenario there will need to be collaboration between the two Projects to optimise construction logistics and to share certain temporary works such as the haul road and construction compounds. This applies to a concurrent build regardless of whether the transmission systems are integrated.'*
47. To be able to come forward as entirely independent projects ('absolutely separate') in a concurrent scenario, each project would need to have had its own main construction compound, separate haul roads and separate substation areas without

- overlapping works. The works descriptions and the Order Limits simply do not provide for this in any scenario. For example, it is also helpful to consider together and compare scenario 3 and scenario 1(d).
48. Scenario 3 provides for some elements of the onshore works to be integrated by providing for a single onshore substation for SEP and DEP together with an integrated onward connection into National Grid's Norwich Main substation. However, the onshore cable corridor from landfall to the integrated onshore substation can be constructed by each project concurrently in the same way as it can under scenario 1(d). Visually, this can be seen most clearly when comparing the scenario 3 and scenario 1(d) figures in the **Supplementary Figures to the Scenarios Statement** [PDA-005] which shows that from landfall to the integrated substation SEP and DEP would construct the onshore cable works pursuant to the same work numbers as scenario 1(d).
 49. Given the similarities between scenario 1(d) and scenario 3 in terms of the works that would be undertaken, and taking into account the way in which the EIA has been carried out as described in **Section 4** below, there is therefore no discernible difference in EIA terms between scenario 1(d) and scenario 3 under the **Draft DCO (Revision F)** [document reference 3.1]. Indeed, the same can be said of scenario 3 and scenario 1(c) as the works to construct the onshore cable corridor between landfall and the integrated substation can be delivered concurrently or sequentially in scenario 3.
 50. The EIA as set out in section 9 of the **Scenarios Statement** [APP-314] and in **Section 4** below has appropriately and robustly assessed the worst-case impacts of all development scenarios included in the **draft DCO (Revision F)** [document reference 3.1] using the Rochdale Envelope approach. As such, there is no EIA justification that could be made out for the removal of some or all of the options under scenario 1 as the ExA has suggested in Q2.6.1.1.

4 Environmental Impact Assessment

4.1 Rochdale Envelope Approach

51. The ExA has posed a number of questions relating to the worst-case scenario for assessment within the ES, and how this relates to the project development scenarios.
52. Section 9.2 of the **Scenarios Statement** [APP-314] made clear that *“to ensure that a robust assessment has been undertaken, all development scenarios and options have been considered to ensure the realistic worst case scenario for each topic has been assessed”*. Each topic specific chapter within the ES has considered the full suite of project development scenarios and defined an appropriate worst-case scenario for assessment relevant to that topic accordingly.
53. The Applicant has further reiterated its position with respect to defining the worst-case scenario in response to various written questions (e.g. Q1.6.1 [REP1-036]) and through the hearings conducted to date (see **Table 1-1** above). In addition, at Procedural Deadline A the ExA requested that the Applicant submit *“A table separately depicting the anticipated adverse effects for each proposed scenario corresponding to the individual receiving environments assessed in the Environmental Statement (ES) [APP-089, APP-092 to APP-115].”*
54. The Applicant submitted its **Response to ExA Request for a table of the anticipated adverse effects for each proposed scenario** [PDA-002] at Procedural Deadline A setting out that *“the Applicant considers that the information that it has provided in its application appropriately identifies and assesses the likely significant effects of the proposed development accounting for the possible development scenarios and design options that would be permitted by the dDCO. The Applicant has given careful consideration to the identification of the worst case in this regard and how this has been demonstrated throughout the assessments, and has consulted extensively with stakeholders on this basis pre-application”*.
55. Further, the Applicant has demonstrated that the ES has been undertaken entirely in accordance with the Advice Note Nine (PINS 2018) which explains the use of the ‘Rochdale Envelope’ approach under the Planning Act 2008 as it applies to the Environmental Impact Assessment (EIA) process set out in The Infrastructure Planning (EIA) Regulations 2017 (the EIA Regulations).
56. The ExA has asked in the Examining Authority’s Second Written Questions [PD-012] Q2.6.1.1 part c) *‘whether information provided thus far, particularly in the ES is sufficient for the assessment of significant adverse effects, especially highlighting any areas where the worst case scenario might be worsen with the removal of Scenario 1’*. The Applicant wishes to remind the ExA of the submission previously made, and summarised above, relating to this matter and reassures the ExA that following careful consideration, **all development scenarios and options** have been considered to ensure the realistic worst-case scenario for each topic has been assessed. By definition there are therefore no project development scenarios that will result in worse impacts than the worst-case scenario as defined in the ES.

57. As set out in **Section 2** above, excluding scenarios from the consent would interfere with the ability of the Applicant to deliver the projects in accordance with government policy. To meet the various requests in Q2.6.1.1 would require a fundamental re-consideration of every aspect of the ES as presented, as it would in effect provide a different set of parameters to define the Rochdale Envelope by. This would be substantial exercise in relation to the ES and in relation to the related plans, DCO and other application documentation. The scale of this exercise serves to highlight how unusual the request is, particularly with less than 3 months of the Examination remaining. As explained in **Section 2**, the Applicant does not consider that it is reasonable to be asked to facilitate a potential material change to its own application and respectfully declines to provide the information requested.

4.2 Construction Effects

58. The EIA demonstrates that the Projects, delivered either sequentially or concurrently, have very limited impacts during construction with the vast majority of topics assessed within the ES reporting that, in the worst-case scenario there are no significant effects in EIA terms. Of the very few effects that are reported, the Applicant has carefully considered mitigation both by design (embedded mitigation through, for example, site selection) and additional mitigation to be delivered through appropriate construction management.
59. **Table 4.1** provides a summary of the predicted residual impacts from SEP and DEP during construction, as reported in the ES. It should be noted that there are **no major adverse residual impacts** and that the vast majority of residual impacts are minor adverse or lower and therefore not significant in EIA terms. There are 3 topic areas where moderate adverse impacts (significant in EIA terms) are predicted: land use; landscape and visual; and seascape and visual. **Table 4.1** provides notes explaining the extent of those impacts.
60. The Applicant contends that reporting predicted moderate adverse impacts during the construction phase of a major infrastructure project is very common for the topics in question, and notes that there will be many cases where similar (or even higher) impacts will have been predicted from a given development that the Secretary of State has determined do not outweigh the need case for the development and has therefore granted consent for.
61. The scope and approach to the EIA has been agreed with the Local Authorities and other key stakeholders as demonstrated through the Evidence Plan Process and the Statement of Common Grounds. As such there are very few matters to be resolved and these relate to specific areas.

Table 4-1 Summary of predicted residual impacts from SEP and DEP during construction

Key
No significant residual impacts
Moderate residual impact/s (significant)
Major residual impact/s (significant)

ES chapter	Significant residual impact/s (worst-case for SEP and DEP unless where stated) ¹	Notes
Chapter 6, Marine Geology, Oceanography and Physical Processes	All impacts negligible or less	-
Chapter 7, Marine Water and Sediment Quality	All impacts negligible or less	-
Chapter 8, Benthic and Intertidal Ecology	All impacts minor adverse or less	-
Chapter 9, Fish and Shellfish Ecology	All impacts minor adverse or less	-
Chapter 10, Marine Mammal Ecology	All impacts minor adverse or less	-
Chapter 11, Offshore Ornithology	All impacts minor adverse or less	-
Chapter 12, Commercial Fisheries	All impacts minor adverse or less	-
Chapter 13, Shipping and Navigation	Some moderate adverse impacts are predicted in EIA terms on shipping and navigation receptors but these are judged to be not significant.	-
Chapter 14, Offshore Archaeology and Cultural Heritage	All impacts minor adverse or less	-
Chapter 15, Aviation and Radar	All impacts minor adverse or less	-
Chapter 16, Petroleum Industry and Other Marine Users	A moderate adverse impact is predicted with respect to potential interference with O&G operations but this is judged to be not significant.	-

¹ Differences in the terminology used are explained by differences in the EIA methodology applied to different topics – refer to the respective ES chapters for details.

ES chapter	Significant residual impact/s (worst-case for SEP and DEP unless where stated) ¹	Notes
Chapter 17, Onshore Ground Conditions and Contamination	All impacts minor adverse or less	-
Chapter 18, Water Resources and Flood Risk	All impacts minor adverse or less	-
Chapter 19, Land Use, Agriculture and Recreation	A moderate adverse impact is predicted with respect to temporary loss of land for agriculture.	<p>The total construction footprint within agricultural land would be >20ha in all scenarios (SEP or DEP in isolation or SEP and DEP, concurrent or sequential) therefore the magnitude of effect (medium) and impact significance (moderate adverse) are the same regardless of the scenario under consideration. This is the case regardless of the duration of construction (up to 24 months for SEP or DEP, or two separate periods of 26 and 22 months if SEP and DEP are constructed sequentially).</p> <p>The same mitigation measures will be applied regardless of the construction scenario, including: landowner consultation; maintaining access for farm vehicles; planning timing of the works; and use of private agreements where necessary.</p>
Chapter 20, Onshore Ecology and Ornithology	All impacts minor adverse or less	-
Chapter 21, Onshore Archaeology and Cultural Heritage	All impacts minor adverse or less	-
Chapter 22, Air Quality	All impacts not significant	-
Chapter 23, Noise and Vibration	All impacts minor adverse or less	-
Chapter 24, Traffic and Transport	All impacts minor adverse or less	-
Chapter 25, Seascape and Visual Impact Assessment	Significant adverse effects during the construction phase are predicted due to SEP on the Peddars Way, Norfolk Coast Path and England Coast Path, and visual Receptor Group Blakeney to Mundesley.	<p>Effects on all landscape and visual receptors, if SEP and DEP were both implemented, would be the same significance as assessed for SEP on its own, regardless of the scenario under consideration.</p> <p>The same embedded mitigation measure applies regardless of the construction scenario.</p>

ES chapter	Significant residual impact/s (worst-case for SEP and DEP unless where stated) ¹	Notes
	No significant adverse effects during the construction phase are predicted due to DEP.	
Chapter 26, Landscape and Visual Impact Assessment	A range of adverse effects from negligible to moderate are predicted during construction of the onshore cable corridor. Similarly, a range of adverse effects are predicted during the construction of the onshore substation, including significant effects on visual amenity for public rights of way, the permissive bridleway and Gowthorpe Lane within the immediate context of the onshore substation.	For the onshore cable corridor, the greatest effects will result from the maximum construction duration and land-take, with moderate effects on visual amenity recorded for some visual receptors. For the onshore substation, the greatest effects are likely to occur during operation, resulting from the maximum footprint and height parameters, however the significance of effects during construction would be the same as assessed during operation. The same mitigation applies regardless of the construction scenario.
Chapter 27, Socio-Economics and Tourism	All impacts minor or less	-
Chapter 28, Health	All impacts not significant	-

4.3 Cumulative Effects

62. The Applicant has recognised throughout that there is a preference from the local community and other statutory and non-statutory stakeholders for the two projects to be delivered concurrently. It has also given very careful consideration to the current context within Norfolk where a number of other NSIP and local infrastructure projects are being promoted or have already received consent.
63. Through the pre-application process the Applicant has also sought ways to minimise and mitigate any adverse impacts on the local community, having specific regard to the potential for cumulative effects. As set out in Table 1-2 of the [Consultation Report](#) [APP-029] the Applicant had regard to consultation feedback received from a range of stakeholders, and made changes to the project design, or committed to additional mitigation accordingly to address concerns.
64. In addition to the embedded mitigation, commitments made by the Applicant which seek to minimise the cumulative effects of the construction work onshore include:
 - Prohibiting Heavy Goods Vehicle (HGV) traffic associated with SEP and DEP from utilising specific roads and villages (e.g. through Attlebridge, Barford, Blind Lane, Cantley Lane South, Cawston, Horsford, Oulton, Plumstead; and Weston Longville);

- Adhering to ‘cumulative caps’ on HGV movements on specific link roads to manage potential cumulative impacts associated with the construction of Norfolk Vanguard/Boreas and Hornsea Project Three;
 - Committing to an increased number of HDD crossings to minimise road closures and diversions, listed within Annex C of the **Outline Construction Traffic Management Plan (Rev C)** [document reference 9.16];
 - Introduction of measures to manage light vehicle movements through Oulton;
 - Maintaining access to parcels of agricultural land that may become isolated during the construction works; and
 - Committing to the longer-term management of landscaping covering the lifetime of the onshore substation and 10 years aftercare for other areas (as opposed to 5 years agreed initially).
65. The Applicant has undertaken a robust cumulative impact assessment as reflected across the application documents and in the draft statements of common ground with key stakeholders, including Norfolk County Council [REP2-033]. The ES identifies a very limited number of significant cumulative residual impacts from construction. These correspond with the same 3 topic areas where moderate adverse impacts (significant in EIA terms) are predicted with respect to the Projects on their own, as summarised in **Section 4.2** above (namely land use; landscape and visual; and seascape and visual). It follows that these cumulative impacts are based on the same worst-case scenarios identified for the Projects on their own, accounting for the possible development scenarios and design options that would be permitted by the draft DCO.
66. As is the case for the Projects on their own, there are **no major adverse cumulative residual impacts** and the vast majority of cumulative residual impacts are minor adverse or lower and therefore not significant in EIA terms.
67. Where significant cumulative residual impacts are identified the Applicant has carefully considered the appropriate mitigation required, including the commitments that are outlined above. To give a specific example, **Chapter 24 Traffic and Transport** [APP-110] identified the potential for cumulative impacts during construction with other offshore wind farms and highways schemes. The assessment noted HGV limits imposed on certain routes for other projects by Norfolk County Council, which was factored into the routing of construction traffic for SEP and DEP. In addition, the assessment identified the requirement for further caps (as noted above) to reduce the impact of cumulative traffic on selected roads. With the addition of this mitigation, the cumulative impact assessment concluded that (under any scenario) there will be no significant residual traffic and transport impacts. It has further been agreed with Norfolk County Council [REP2-033] that the potential for cumulative impacts between the construction phases of the highway schemes plus SEP and DEP can be managed through the respective projects’ Construction Traffic Management Plans.

5 Stakeholder Support

68. As stated at Issue Specific Hearing 1 on 18 January 2023 (see the [Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 1 \[REP1-031\]](#)), the Applicant was encouraged by the Planning Inspectorate at the pre-application stage to include both NSIPs in a single DCO application.
69. On 31 March 2022 the Applicant made a submission of certain draft application documents to the Planning Inspectorate for review including ES Chapter 4 Project Description, ES Chapter 5 EIA Methodology, Draft DCO, Onshore Works Plans, and Offshore Works Plans. Section 51 advice was received from the Planning Inspectorate on 27 May 2022 (PINS 2022). Prior to submission of the DCO application the Applicant and the Planning Inspectorate held a follow up meeting on 15 June 2022 (PINS 2022) to specifically discuss the approach taken to scenarios within the application, and the section 51 advice received with respect to how the proposed development scenarios were described and presented within the draft application documents. The Applicant had regard to the section 51 advice received, and it was agreed with the Planning Inspectorate that the DCO application would benefit from a document which would make clear the reasoning for the project development scenarios and explain the step through between the ES and Draft DCO. The Applicant submitted the [Scenarios Statement \[APP-314\]](#) pursuant to this advice, and was otherwise not discouraged from submitting the application in its current form.
70. The Applicant was also encouraged to include both projects into a single DCO application during pre-application consultation with the local authorities and other key stakeholders. The Applicant was under no obligation to do so, not least because the projects had different ownership groups. If one or more options from Scenario 1 were removed from the DCO, or if the DCO were refused on the basis that they were included, then this would amount to taking away from the Applicant something (in particular, the option to build sequentially) which it could straightforwardly have obtained by making separate DCO applications. This would be unreasonable.
71. The local planning authorities have demonstrated support for the principle of the development of SEP and DEP, as evidenced in the SoCGs. South Norfolk Council, Broadland District Council and North Norfolk District Council all agree that there is a need to provide new forms of renewable energy generation (ID 1 of Table 3: Project-wide considerations) of REP1-041, REP1-042 and REP2-048. Of note, in their Local Impact Report (LIR) (REP1-082), North Norfolk District Council state that the Full Council agreed a motion declaring a Climate Emergency. Paragraph 3.5 of the LIR accordingly recognises the 'project's contribution to renewable energy is a significant **positive impact**'.
72. As set out in [Section 2.3.3](#) above the approach to developing the projects together has been supported by Government, as set out in the award of Pathfinder status letter.

References

DECC National Policy Statement for Energy (EN-1) (2011)
DECC National Policy Statement for Renewable Energy Infrastructure (EN-3) (2011)
DECC National Policy Statement for Electricity Networks Infrastructure (EN-5) (2011)
DESNZ Draft Overarching National Policy Statement for Energy (EN-1) (March 2023)
DESNZ Draft National Policy Statement for Renewable Energy Infrastructure (EN-3) (March 2023)
DESNZ Draft National Policy Statement for Electricity Networks Infrastructure (EN-5) (March 2023)

Appendix A – ‘the award of Pathfinder status letter’

Letter from The Rt Hon Greg Hands MP, Minister of State for Energy, Clean Growth and Climate Change to Equinor’s Senior Vice-President of North Sea Renewables dated 29 June 2022



Department for
Business, Energy
& Industrial Strategy

The Rt Hon Greg Hands MP
Minister of State for Energy, Clean Growth
and Climate Change

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29 June 2022

Dear Mrs Borum Bojsen,

Thank you for submitting a proposal for the Sheringham Shoal extension and Dudgeon extension projects to be considered as a Pathfinder under the Offshore Transmission Network Review (OTNR). I am writing this letter to welcome your proposal and confirm that we see merit in progressing this project as a Pathfinder.

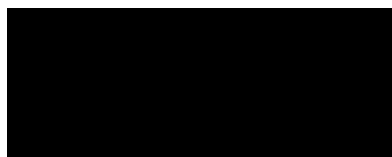
The British Energy Security Strategy sets out an ambition for 50GW of offshore wind capacity by 2030, and both Sheringham Shoal and Dudgeon are considered important projects in delivering this. Through the Offshore Transmission Network Review (OTNR), we are seeking to develop an increasingly coordinated offshore transmission network to minimise the impacts to the community and the environment, reduce costs, and support the acceleration of offshore wind deployment.

The OTNR has taken an ambitious approach to maximising the impact it can have on the offshore wind project pipeline through its triple track approach across the near-, medium- and long-term timeframes. Pathfinder projects are a critical component of this approach and will allow the OTNR to deliver benefits as soon as possible and provide important learnings for the other parts of the review.

The concept of Pathfinder projects was created for such projects that are leading the way in utilising the enabling regulatory and policy changes being developed by project partners to meet the OTNR objectives. Having reviewed this proposal, I am encouraged by the degree of coordination being pursued and look forward to applying the learnings from delivering this project to the wider OTNR.

In confirming this project's inclusion in the first tranche of Pathfinders under the OTNR, BEIS and its other OTNR partners are committed to working closely with yourselves to address regulatory or policy challenges. I look forward to working with you to realise the benefits to consumers, the environment, and the community, that this project has the potential to deliver.

Yours ever,



THE RT HON GREG HANDS MP
Minister of State for Energy, Clean Growth and Climate Change