



Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects

The Applicant's comments on Mr Derek Aldous' Deadline 2 Submission

Revision A

Deadline 3

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1 Introduction

1. This document provides the Applicant's comments on Mr Derek Aldous' submissions at Deadline 2. The topics covered include the grid connection point and comments on Local Impact Reports, submitted by Local Authorities. The topics and responses are provided in **Table 1-1** below.

Table 1-1 The Applicant's comments on Mr Derek Aldous' Deadline 2 Submission

ID	Stakeholder Comment	Applicant Response
Local Impact Reports – Onshore Substation		
1	<p>South Norfolk Council has correctly identified the cumulative effect on landscape character at the onshore substation site as an important local issue. This however arises primarily from the very much larger Hornsea Three onshore substation, which would be located on high ground. The substation for the Proposed Development, by contrast, would be located in a hollow, and generally in accordance with the Holford and Horlock design principles.</p>	<p>Mr Aldous' comments are noted by the Applicant.</p> <p>The Applicant firstly refers Mr Aldous to the following submitted documents, which sets out the discussion between the Applicant and South Norfolk District Council ('SNC') on cumulative effects:</p> <ul style="list-style-type: none"> • 14.3 The Applicant's Comments on the Local Impact Reports [REP2-039]; and • 12.6 Draft Statement of Common Ground (SoCG) with South Norfolk District Council [REP1-041] <p>The Applicant secondly acknowledges Mr Aldous' commentary on Hornsea Project Three Offshore Wind Farm DCO ('Hornsea Three') and notes that matters related to Hornsea Three lie outside of the Applicant's remit. Therefore, the Applicant cannot not offer a response on this part of the comment.</p>
2	<p>The Local Impact Report for Hornsea Three was based on the DCO application as submitted, and it did not consider the addition of industrial scale battery storage within the substation site boundary.</p>	<p>The Applicant acknowledges Mr Aldous' comment and notes that matters related to Hornsea Three lie outside of the Applicant's remit. Therefore, the Applicant cannot not offer a response in reply to this comment.</p>
3	<p>As now proposed, this would cover a considerable part of the site, and would constitute a further change of landscape character. The two photographs below show the initial pre-commencement works for Hornsea Three, which have already entailed the removal of roadside hedgerows and trees.</p>	<p>The Applicant acknowledges Mr Aldous' comment and notes that matters related to Hornsea Three lie outside of the Applicant's remit. Therefore, the Applicant cannot not offer a response in reply to this comment.</p> <p>The Applicant refers Mr Aldous to ID 31 of REP2-039, which sets out the approach of ES Chapter 26 LVIA [APP-112]; the schemes identified as being relevant to landscape and visual receptors; and those which was assessed as part of its cumulative impact assessment ('CIA'). The Applicant considers that its CIA is in accordance with best practice guidance and sufficient in Environmental Impact Assessment terms.</p>
Grid Connection Point - Summary		

ID	Stakeholder Comment	Applicant Response
4	Approval or otherwise of the grid connection point for the Proposed Development would appear to be a matter for this examination.	<p>The Applicant refers to the Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 4, under ID 4.1, which confirms that the process for selecting a grid connection point (known as Connection and Infrastructure Options Note (CION)) National Grid led. Further information on the process is set out The Applicant's Responses to the Examining Authority's First Written Questions [REP1-036] (WQ1.2.2.1) and The Applicant's Comments to Relevant Representations [REP1-033 and REP1-034] submitted at Deadline 1.</p> <p>In addition, the Applicant has submitted further detail on the CION process including CION guidance in response to WQ2.2.2.1.</p>
5	A consideration of the alternatives, giving adequate weight to onshore planning, environmental and amenity aspects and the impact on local communities consistent with the Planning Act 2008 and the National Policy Statements, seems to be required and does not appear to be inherent in the process by which a grid connection offer has been made.	<p>The Applicant refers to the response provided to WQ2.2.1 d) which confirms that no alternative grid connections were offered to the Applicant. Whilst the CION process considered a range of potential options, it resulted in only Norwich Main being offered to the Applicant. Alternative grid connections were therefore not considered or reported on within the Environmental Statement or by the Applicant.</p>
6	Onward grid capacity is critical to climate change objectives. This too does not seem to have been given appropriate weight in the grid connection offers for Vanguard, Boreas, Hornsea Three and the Proposed Development.	<p>The Applicant supports the initiatives which help meet and exceed climate change objectives.</p> <p>With reference to the onward transmission network, the following response was provided within The Applicant's Comments on Written Representations [REP2-017], submitted at Deadline 2 and The Applicant's Comments to Relevant Representations [REP1-033 and REP1-034] submitted at Deadline 1:</p> <p>'East Anglia Green is not linked to SEP and DEP, nor are the two projects dependent on the others consent. East Anglia Green is not required in order for National Grid to provide the necessary grid capacity to connect SEP and DEP.'</p> <p>The Applicant acknowledges the comments with respect to other offshore wind farm DCO's and reiterates that it is not appropriate for the Applicant to comment on or speculate about another project.</p>

ID	Stakeholder Comment	Applicant Response
7	Approval of the application as submitted would be the final step in the grid connection agreement procedure. In the absence of development consent, it would appear that the connection offer lapses.	As mentioned in ID5 above, the CION process resulted in only Norwich Main being offered to the Applicant as a grid connection point. Construction of the infrastructure is regulated under a different legislative framework and consent is sought within the draft DCO.
8	Extracts from relevant documents are provided overleaf. Due to the late submission from NG ESO for Deadline 1, this representation has been prepared in haste and may not be complete.	It is noted that the documents referred to relate to the CION process for SEP and DEP and other projects. The Applicant has no further comment to make.
Grid Connection Point - Grid connection agreement		
9	In its response to issues raised at the first Open Floor Hearing (OFHI), the applicant makes clear that the proposed grid connection point has been identified by National Grid in a connection offer.	The Applicant refers to the response provided to WQ2.2.1 f) which notes that 'only one connection point, Norwich Main, was offered to the Applicant and therefore no other alternatives have been studied as part of the DCO application. The requirements of the EIA Regulations do not require an assessment of alternative grid connection locations within the Environmental Statement given that no other connection points represent a 'reasonable alternative'... 'studied by the developer'.
10	Past examples suggest that, after informal discussion, a grid connection offer is made by NG ESO on the basis of an offer which, in turn, NG ESO has received from NG ET. This has been confirmed by NG ESO for the purposes of this examination (EN010109-001049, paragraph 1.5).	
11	It would appear that the dialogue between NG ESO and NG ET does not necessarily include the applicant at all stages, and is not based upon the Planning Act 2008, the National Policy Statements, or other relevant legislation applicable to this examination. Cumulative impacts do not appear to have been considered at all.	
12	Local Impact Reports, which were not available during the CION process, are likely to be a key consideration in terms of landscape character, construction traffic, economic and social impacts, etc.	
13	It follows that the present examination is the only route by which such issues can be addressed.	
Grid Connection Point – Past Examples		

ID	Stakeholder Comment	Applicant Response
14	A similar discussion took place during the examinations for East Anglia One North and Two. The wording of the responses to the examining authority's questions provides somewhat greater clarity.	The Applicant acknowledges the comment.
15	Further, in its Phase 1 Report for the Offshore Transmission Network Review, NG ESO made clear that it has not specifically taken account of cumulative impacts, and that the impact on communities has been 'managed' - presumably by the applicant through the DCO examination procedure. This applies to the timeframe when the grid connection offer was made for the Proposed Development.	<p>As set out above, the Applicant refers to the response within WQ2.2.2.1, which confirms that the only grid connection offered to the Applicant was at Norwich Main. As no other alternative was offered, the the EIA Regulations do not require an assessment og alternative grid locations within the Environmental Statement, given that no other connection points represent a 'reasonable alternative'... 'studied by the developer'.</p> <p>This is supported by the designated NPS EN-1 policy which clearly limits any need to consider alternatives where it states (in paragraph 4.4.1) that:</p> <p><i>"this NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option".</i></p> <p>A full and robust EIA has been undertaken in accordance with the EIA Regulations which includes a cumulative impact assessment within each topic chapter (see .</p> <p>Section 5.8 of ES Chapter 5 EIA Methodology [APP-091]).</p>
16	It would appear that the suitability of the grid connection is an open issue.	<p>The Applicant refers to the response provided to Q2.2.2.1. Of note, NPS policy is clear that alternatives are relevant only in specified circumstances. Paragraphs 2.2.1 of the current draft NPS EN-5 fully recognises that <i>"The Applicant does not substantially control the initiating and terminating points of new electricity networks infrastructure. The siting is determined by the location of new generating stations and/or system capacity by the Electricity System Operator."</i></p> <p>The Applicant does not consider the suitability of the grid connection to be an open issue particularly given (as referenced within the response to Q2.2.2.1(f)):</p> <ul style="list-style-type: none"> the process for NGESO making a grid connection offer to a customer is regulated separately under a different relevant legislative framework;

ID	Stakeholder Comment	Applicant Response
		<ul style="list-style-type: none"> only one connection point, Norwich Main, was offered to the Applicant and therefore no other alternatives have been studied as part of the DCO application; and the requirements of the EIA Regulations are not applicable to the grid connection location given that no other connection points represent a <i>'reasonable alternative'</i>... <i>'studied by the developer'</i>.