



# Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects

The Applicant's Response to the Norfolk Parishes  
Movement for an Offshore Transmission Network's  
Deadline 3 Submission

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<b>Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects Examination submission</b>	
<b>The Applicant's Response to the Norfolk Parishes Movement for an Offshore Transmission Network's Deadline 3 Submission</b>	
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## 1 Introduction

1. This document presents the Applicant's response to the Grid Connection Point Written Representation of the Norfolk Parishes Movement for an Offshore Transmission Network's (The Norfolk Parishes Movement) Deadline 3 submissions [REP3-151]. The Applicant's comments on The Norfolk Parishes Movement's post hearing submissions are provided in **The Applicant's Comments on Post-Hearing Submissions** [document reference 18.14].

**Table 1 The Applicant's Response to the Norfolk Parishes Movement for an Offshore Transmission Network's Deadline 3 Submission**

ID	Stakeholder Comment	Applicant Response
1	<p>Madam Chair, on behalf of the Norfolk Parishes Movement for an Offshore Transmission Network ("The Norfolk Parishes Movement") I would like to set out for the ExA further information regarding the grid connection point for the SEP and DEP projects. Specifically, I refer the ExA to the first written questions, Q1.2.2.3, which refers to Walpole, and which NG ESO responded to in their document REP 1-188 (EN010109-001049).</p>	<p>The Applicant acknowledges the comments made by the Norfolk Parishes Movement for an OTN at ID 1 to 10 of this document and refers the ExA to its responses to Q2.2.2.1 within <b>The Applicant's Responses to the Examining Authority's Second Written Questions</b> [REP3-101]. The Applicant has nothing further to add at this stage.</p>
2	<p>As the ExA is aware, the Applicant has steadfastly refused to provide any meaningful information regarding the alternative grid connection points which have been considered for these projects despite this being a requirement of the National Policy Statement EN-1 and the planning inspectors own guidance. As explained at the OFH at Gresham's on 29 March 2023, we have been advised that the position of the Applicant on this matter is incorrect and it would be unfortunate to have to test this in a court of law. Instead, the Applicant has sought to exploit the confidentiality of the CION process used by National Grid ESO together with National Grid ET to determine the grid connection point.</p>	
3	<p>The Norfolk Parishes Movement believes that, in view of the cumulative impact on the environment and local communities, it is essential that alternative routes are considered and weighed in the planning balance of the current proposal. In particular, we believe that a grid connection point at Walpole, either directly or via the Sutton Bridge power station, is both viable and preferable. We believe that such a connection should have been a serious consideration during the CION process.</p>	
4	<p>On 26 March 2023, we sought information under the Environmental Information Regulations 2004 from National Grid concerning the alternatives considered by the Applicant, National Grid ESO and National Grid ET, for the SEP and DEP projects. The request and response now received is attached to this submission. As you will see, National Grid ESO has provided no information but the single sentence in this reply that constitutes the actual response is practically the same as the wording that National Grid has already submitted in reply to the ExA's first written</p>	

ID	Stakeholder Comment	Applicant Response
	<p>questions. As the Norfolk Parishes Movement has pointed out previously, this response is not only incorrect, but it is also unprofessional and wholly unsatisfactory (please refer to our submission at Deadline 2).</p>	
5	<p>It is hoped the ExA will acknowledge that the Norfolk Parishes Movement has taken all reasonable steps to establish the validity of the position it is putting forward to the examination, has acted responsibly in seeking to obtain evidence either for or against its position and is showing transparency to the examination procedure and we would like to make the following points:</p>	
6	<p>1. It is difficult to rationalise a process that requires the Applicant to set out in precise details the cable route, the trenchless crossing method, the companies that it will or will not compensate, the mitigation measures it will put in place, the responses to each of the concerns of the various statutory consultees and interested parties, etc., etc. and yet is apparently powerless to demand that the Applicant provides evidence of prior consideration of environmental and socio-economic information concerning an alternative grid connection point.</p>	<p>The Applicant acknowledges the comments made by the Norfolk Parishes Movement for an OTN at ID 1 to 10 of this document and refers the ExA to its responses to Q2.2.2.1 within <a href="#">The Applicant's Responses to the Examining Authority's Second Written Questions</a> [REP3-101]. The Applicant has nothing further to add at this stage.</p>
7	<p>2. The validity of permitting such secrecy by the Applicant must be questioned when this project, if it were granted consent, would be eligible for considerable amounts of public subsidy. The overriding rationale for this secrecy is given as "commercial confidentiality" - a justification that does not sit well with the public examination of an NSIP planning application. It highlights starkly an often-overlooked conflict of interest in this uncomfortable interface between public subsidy and private profit.</p>	
8	<p>3. The mere existence of a grid connection offer should, in our view, be given very little weight in the general proceedings of the examination. The CION process is primarily concerned with cost and the onus is on the Applicant to provide information to National Grid ESO on whether the grid connection point will be acceptable from the perspectives of environmental impact, planning consent and deliverability issues. It is essential therefore that this NSIP</p>	

ID	Stakeholder Comment	Applicant Response
	examination fully tests the Applicant's submission in determining the planning balance.	
9	4. In terms of the formal planning framework for an NSIP, and all the different issues that have to be considered, there is, at this time, no evidence before this examination that the ExA can reliably depend upon to support the proposed grid connection point when considering its recommendations.	