

**Associated development**

Summary

This representation objects to the application as submitted on the grounds that proposed associated development, such as battery storage and a new pylon route, has not been adequately addressed.

In addition, the applicant has made reference to draft revisions of the National Policy Statements for Energy, specifically EN-1, EN-3 and EN-5. These draft revisions are still open for consultation and have not yet been designated. The suggestion that an emerging draft should carry material weight in a DCO examination, whilst present in the drafts, is not found in the existing designated Statements and does not appear to be applicable to this Examination. Thus, these references should be set aside.

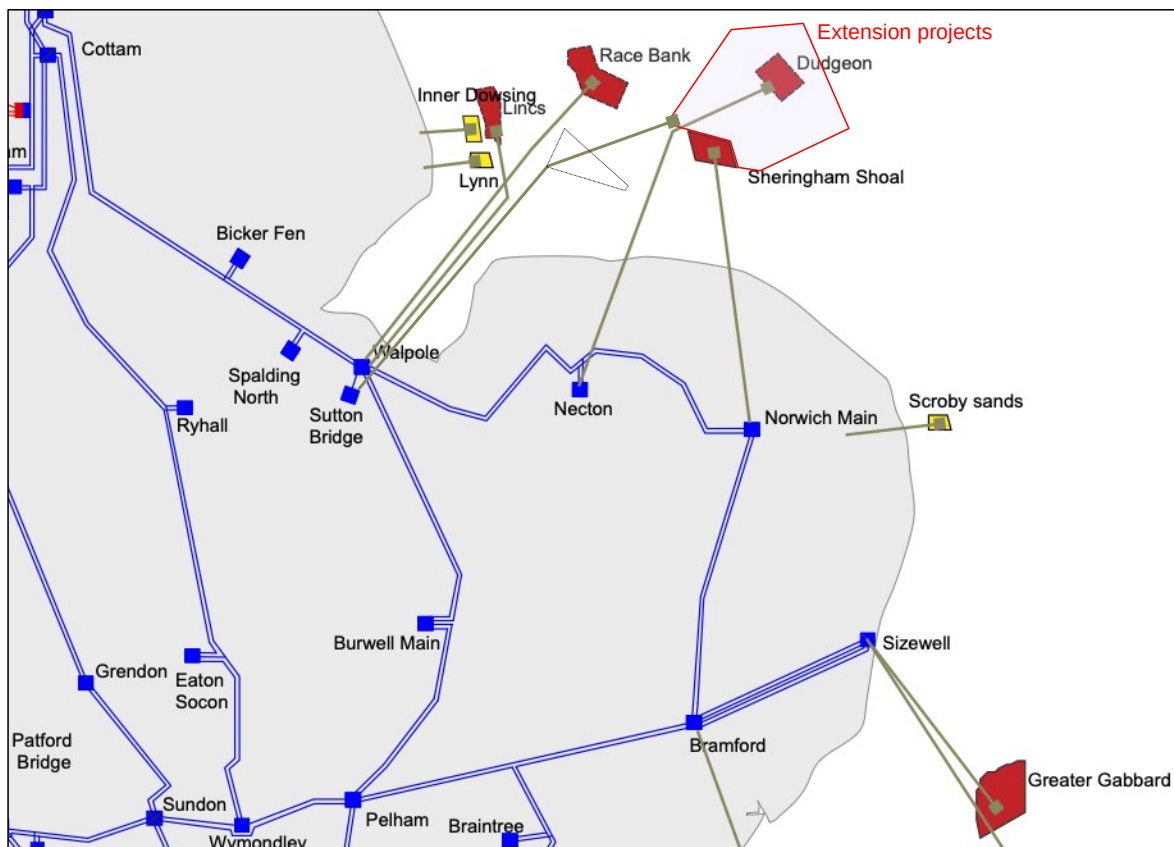
Baseline development scenario

Associated development can be minimised using the baseline development scenario shown below.

This scenario is reasonable, efficient, economic and coordinated, satisfies the forecast demand for renewable energy at the two Grid Supply Points of Walpole and Norwich Main, advances climate change mitigation, takes into account the consideration of alternatives, reduces costs for the final electricity consumer, and is based on information generally available to the public. It is also fully compatible with the multi-stage development scenarios proposed in the application as submitted.

No significant requirements for associated development are introduced other than the extension of the export cable to a grid connection point approximately 7.5km inland from the Norfolk coastline.

This scenario is described in more detail in REP3-172, EN010109-001254, pp. 8-12.



Source: Electricity Ten Year Statement 2022, with Dudgeon and Sheringham Shoal extension projects added on the basis of a grid connection at Sutton Bridge for the full potential offshore generation output of 950MW.

## Associated development scenario

Little more is gained by bringing Vanguard, Boreas and Hornsea Three into the county of Norfolk and connecting the Dudgeon and Sheringham Shoal extension projects to the grid at Norwich Main.

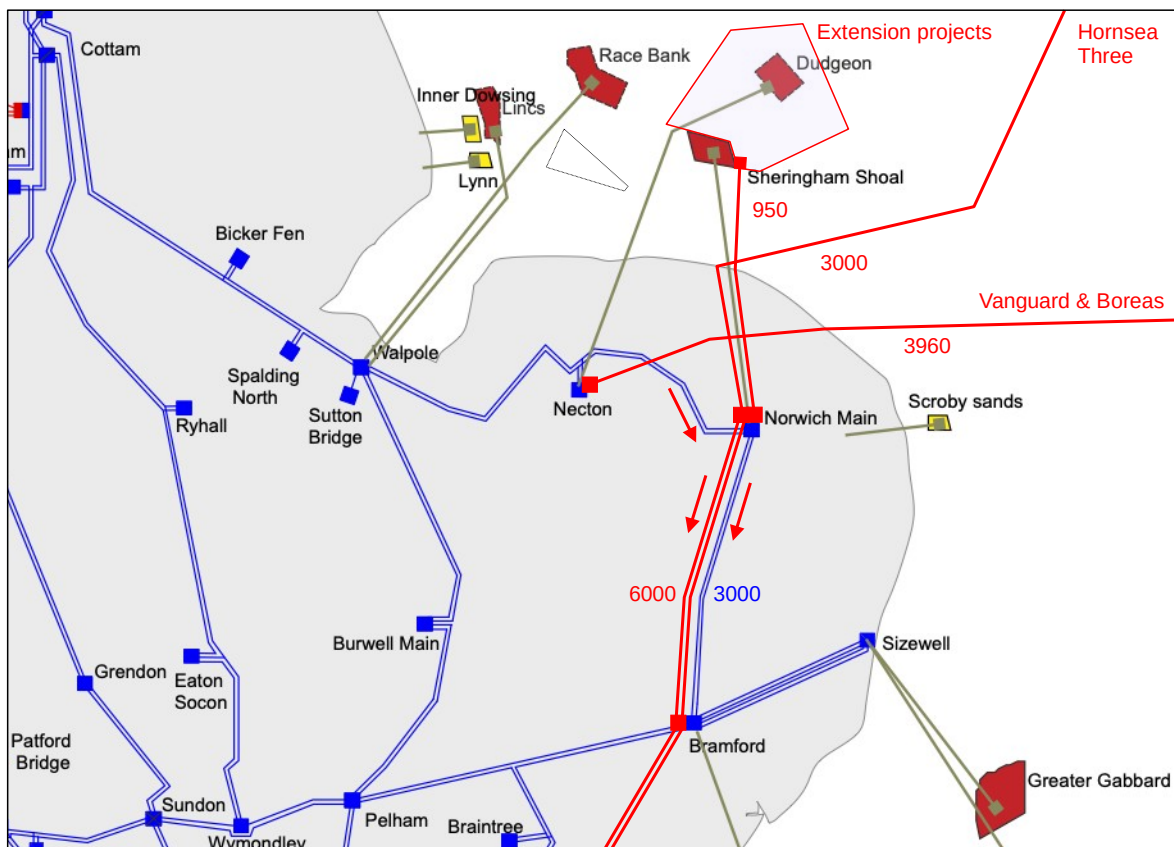
This scenario is shown below. Recognising the need for renewable energy, the maximum output of each project is assumed as listed in their TEC Register entries. Associated development includes 150km of undergrounding, battery storage projects at and around the Norwich Main substation site, and 180km of pylon route construction from Norwich to Tilbury. Whilst the Wash area is avoided, the Cromer Shoal Chalk Beds are affected by the export cables and there are new landing points at Weybourne and Happisburgh. Difficulties arise from the use of multi-stage development scenarios and the total amount of associated development is disproportionate to the benefits of the projects. The outcome is not efficient, economic, or coordinated, compares poorly with offshore alternatives, and is not compatible with the duties laid on the Secretary of State by the Climate Change Act 2008.

National Policy Statement EN-1 para. 4.9.2, together with the guidance on associated development, makes clear that the application for the principal development should either include any associated development in a single application, or give reasons for not including it within the main application.

In approving Vanguard, Boreas and Hornsea Three, the Secretary of State does not appear to have taken into account the actual contribution made by these projects to the need for renewable energy or the environmental impact of the associated pylon route and batteries, and does not seem to have taken the necessary steps to obtain the information required to make a reasonable decision.

## Conclusion

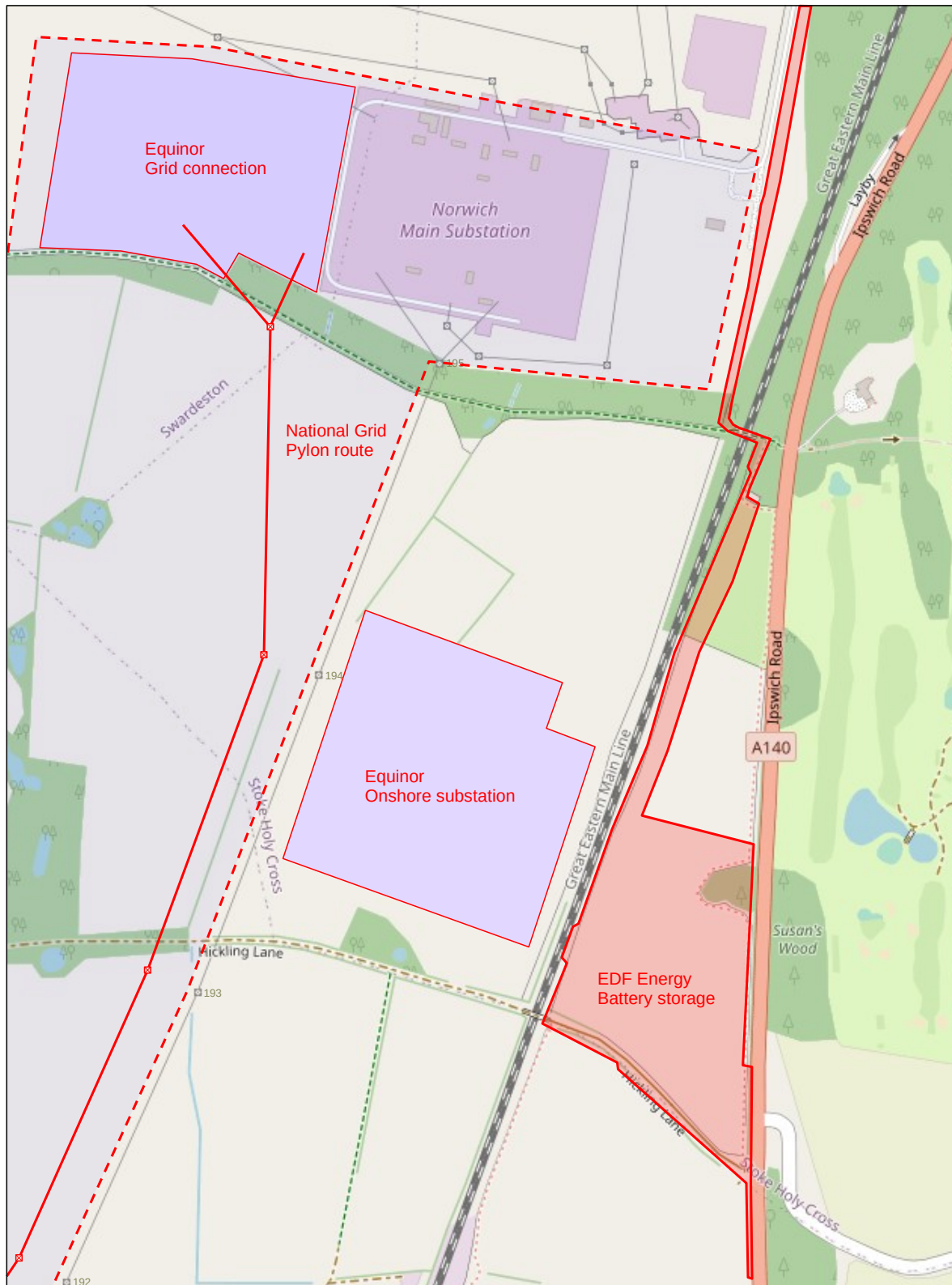
From these considerations, it would appear that Vanguard, Boreas and Hornsea Three have not been lawfully consented. They are, however, now proceeding on this basis. In this context, it is essential that the Dudgeon and Sheringham Shoal extension projects fully address associated development.



Source: Electricity Ten Year Statement 2022, with Dudgeon and Sheringham Shoal extension projects added together with Vanguard, Boreas, Hornsea Three, and the proposed new pylon route from Norwich to Tilbury.

Associated development

The proposed new pylon route and battery storage adjacent to the Equinor substation site as shown below are not included within the DCO applications for Vanguard, Boreas and Hornsea Three or the Dudgeon and Sheringham Shoal extensions projects, and may be seen as associated development.



Source: Dudgeon and Sheringham Shoal extension projects DCO application, EDF Energy (ref. 2023/0617), and National Grid consultation documents. The precise alignment of the Norwich-Tilbury route is uncertain.