

Date: 13 June 2023
Our ref: TWHI/MLOF/2026502.413
Your ref: EN010109/Sheringham & Dudgeon
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National Infrastructure Planning
Planning Inspectorate
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By email only to sadep@planninginspectorate.gov.uk

Dear Sir/Madam,

Sheringham Shoal Offshore Wind Farm Extension Project and Dudgeon Offshore Wind Farm Extension Project

Written Submission on behalf of National Grid Electricity Transmission Plc

Deadline 5 (13 June 2023)

- 1 We act on behalf of National Grid Electricity Transmission Plc ("**NGET**") in relation to the Sheringham Shoal Offshore Wind Farm Extension Project and Dudgeon Offshore Wind Farm Extension Project (the "**DCO Scheme**").
- 2 We write further to NGET's Written Representation dated 20 February 2023 [REP1-127 to REP1-130] (the "**Written Representation**") in order to update the Planning Inspectorate on matters related to the interface between the DCO Scheme and Norwich Main Substation (the "**Substation**").
- 3 Paragraph 2.4 of the Written Representation explains NGET's position in respect of those interfaces as follows (with emphasis now added):

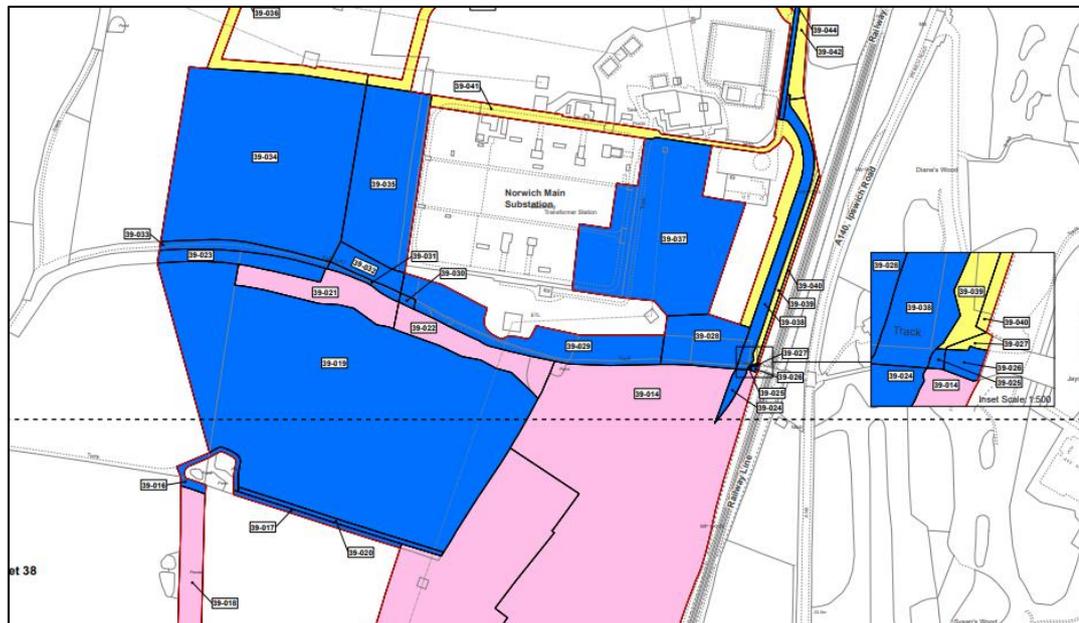
"NGET is particularly concerned about:

- (a) *the effect which the Promoter's proposed connection into the Substation (being Works No. 16A/B or C and 17A/B or 17C (defined as the "National Grid substation connection works") in the Draft Order) may have on planned customer connections into the Substation as well as those other connections likely to be proposed at a later date;*
- (b) *the effect which the Promoter's rights requested over land surrounding the Substation may have on the intended expansion of the Substation required to enable NGET to discharge its duties to its other customers. The Promoter has previously been made aware of relevant future development in areas surrounding the Substation but continues to request rights and powers related to the Authorised Development that would conflict with this development. **Such rights and powers are not necessary, in NGET's opinion, in relation to the Promoter's connection into the Substation, as the proposed connection bay for the Promoter will be located to the west of the Substation;***

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- (c) *the likely interface between the Authorised Development and other future intended extension or development of the Substation which is necessary in order to allow NGET to discharge its various duties as a statutory undertaker, including to make available sufficient connection space for new customers to ensure adequate electrical supply. However, and based on a review of the submissions made to date by the Promoter, NGET is concerned that the Authorised Development may prevent such necessary developments or extensions as are necessary to accommodate those new connections; and*
- (d) *the effect of the rights and powers sought by the Promoter over the access road to the Substation. This is the only means of accessing the Substation, and as owner of the transmission system NGET must have unrestricted access to the Substation to ensure it is capable of discharging its duties with regard to maintenance.*

- 4 NGET remains particularly concerned that both the Book of Reference (Revision E) and the Land Plans (Revision C) continue to show both the temporary occupation and use and the permanent acquisition of rights in Plots 39-032, 39-034, 39-035 and 39-037, each of which is immediately adjacent or proximate to the Substation and are highly likely to be required by NGET in relation to the planned extension of the same. An extract from Sheet 39 of the Land Plans is included below:



- 5 Whilst NGET recognises that the Applicant needs to ensure that sufficient rights are acquired to enable its planned connection to the Substation (referred to elsewhere as the 'National Grid substation connection works'), the extent of temporary possession powers and rights being sought is entirely disproportionate to the nature of the works required to be undertaken. Indeed, NGET considers that the exercise of those powers and acquisition of those rights could materially impact upon the delivery of its planned Substation extension and, in turn, hinder the effective discharge by NGET of its statutory duties at a critical location in the electricity transmission network.

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- 6 It is therefore crucial that NGET is able to agree terms with the Applicant which effectively and proportionately regulate and manage the interface between the DCO Scheme and future works proposed by NGET in relation to the Substation. Appropriate terms must be in place before any powers are exercised pursuant to the Development Consent Order (if made).
- 7 As matters stand, terms have not been agreed, although NGET remains hopeful that terms will be agreed with the Applicant in good order before the end of the Examination. **NGET must, therefore, still prudently maintain its objection to the DCO Scheme.**
- 8 We recognise that the Examination is already at an advanced stage, but must note that NGET may need to make further representations should matters not progress satisfactorily and ask that the Examining Authority have regard to these.
- 9 We hope this update assists the Examining Authority. If you have any queries for us please do not hesitate to respond to this letter.

Yours faithfully,



Bryan Cave Leighton Paisner