



Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects

The Applicant's comments on Mr Derek Aldous
Deadline 4 Submission

Revision A
Deadline 5
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1 The Applicant's comments on Mr Derek Aldous Deadline 4 Submission

1. This document presents the Applicant's responses to Mr Derek Aldous Deadline 4 submission [REP4-055].
2. The Applicant acknowledges the comments submitted by Mr Aldous and notes that the submission relates to alternative grid connections and is a continuation of the topics raised within Mr Aldous' Deadline 3 submission to which the applicant has responded. In general, the Applicant has nothing further to add and has therefore not reproduced Mr Aldous' original Deadline 4 submission [REP4-055] in full; however, some extracts have been included where references to previous relevant submissions are considered helpful to the Examining Authority.

Table 1 The Applicant's comments on Mr Derek Aldous Deadline 4 Submission

ID	Stakeholder Comment	Applicant Response
Consideration of alternatives		
Summary		
1	<p>There is no reason to suppose that a grid connection offer made under the Electricity Act 1989 will satisfy all the requirements of the Planning Act 2008, or the Climate Change Act 2008, taking into account subsequent amendments of those Acts. A proper consideration of alternatives is required.</p>	<p>As stated within The Applicant's Response to Mr Derek Aldous' Deadline 3 Submission [REP4-041], the Applicant reiterates that the submission is based on a misunderstanding of what is required of the Applicant in making its DCO application and what is required of the Secretary of State in determining it.</p> <p>As noted at ID 12 of The Applicant's Response to Issues raised at the Open Floor Hearing 2 [REP3-114] and reiterated in its response to Q2.2.2.1 within The Applicant's Responses to the Examining Authority's Second Written Questions [REP3-101], the process for projects to secure a Grid Connection Agreement is an Ofgem-regulated process which sits outside of the consenting process for a proposed development. The Applicant notes that the submission provides information on suggested alternative grid connection options but highlights that these are not relevant to the examination of SEP and DEP.</p> <p>The Applicant refers to its responses to Q2.2.2.1 (particularly parts d and f) within The Applicant's Responses to the Examining Authority's Second Written Questions [REP3-101] for further information pertaining to the grid connection and has nothing further to add at this stage.</p>
General approach		
2	<p>National Policy Statement EN-1 para 3.2.3 calls for substantial weight to be given to considerations of need. The weight given, however, should be no more than substantial, and "the weight which is attributed to considerations of need in any given case should be proportionate to the anticipated extent of a project's actual contribution to satisfying the need for a particular type of infrastructure".</p>	<p>As noted in Supplementary Information to the Scenarios Statement [REP3-074], the need for each project is supported 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 of draft EN-1). The draft national policy statements make clear that they are capable of being important and relevant considerations in the decision-making</p>

ID	Stakeholder Comment	Applicant Response
		process by the Secretary of State under section 104 of the Planning Act 2008.
Objection		
3	The application as submitted is unacceptable due to inadequate consideration of alternatives.	<p>The Applicant refers to its response at ID 1 of this document and to Q2.2.2.1 (particularly parts d and f relating to the consideration of alternatives) within The Applicant's Responses to the Examining Authority's Second Written Questions [REP3-101].</p> <p>The Applicant has nothing further to add at this stage.</p>