



Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects

The Applicant's comments on Norfolk Parishes
Movement for an Offshore Transmission Network
Deadline 4 Submission

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1 The Applicant's comments on Norfolk Parishes Movement for an Offshore Transmission Network Deadline 4 Submission

1. This document presents the Applicant's response to the Norfolk Parishes Movement for an Offshore Transmission Network's Deadline 4 Submission [REP4-054].

Table 1 The Applicant's comments on Norfolk Parishes Movement for an Offshore Transmission Network Deadline 4 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") we now provide further information relevant to the current examination of the SEP and DEP proposals. In addition, we comment on the claims made by the Applicant with regard to selection of the grid connection point. Specifically, we refer the ExA to the Second written questions, Q2.2.2.1, which National Grid (NG) ESO has responded to in document REP3-137 (EN010109-001537) and the Applicant responded to in document REP3-101 (EN010109-001418-16.2). Finally, we wish to respectfully suggest a question to National Grid ESO in view of the Applicant's response to the OFH2, ID 15, REP3-114.</p>	<p>The Applicant acknowledges the comments made by the Norfolk Parishes Movement for an Offshore Transmission Network at ID 1 to 3.1 of this document. In general, the Applicant has nothing further to add at this stage; however, references to previous responses and some additional clarifications have been provided.</p> <p>The Applicant notes that the ExA, within The Examining Authority's Third Written Questions [PD-017], has stated that it has no further questions under this topic at this stage.</p>
1 Further Information		
2	<p>We refer to the submission to Deadline 3 by The Norfolk Parishes Movement (REP3-151) which included the outcome of our request to National Grid under the Environmental Information Regulations 2004. Essentially no information on alternative grid connection points has been provided on the grounds that it is commercially sensitive and confidential. National Grid ESO and National Grid ET are apparently cooperating with the Applicant in presenting their response on this matter in a manner which does not serve the public interest and, we suggest, which hampers assessment of the planning balance.</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 highlights that alternative grid connection options are therefore not relevant to the examination of SEP and DEP.</p>
3	<p>We present to you now a formal opinion by Charles Banner, K.C. which has been prepared on behalf of East Anglia Pylons Limited in relation to the East Anglia GREEN project proposed by NG ESO. We consider this Opinion is directly relevant to the current examination in respect of SEP and DEP for the following reasons:</p> <ul style="list-style-type: none"> The opinion comments upon the legality of claiming commercial confidentiality with respect to National Grid documents, such as CION and any subsequent contractual agreement, and supports our submission in REP3-151 	<p>The Applicant notes the K.C. Opinion prepared in relation to the East Anglia Green (EAG) project but does not agree that it has relevance to this Examination in the way that the Norfolk Parishes Movement for an OTN suggests.</p> <p>Further information regarding EAG in the context of SEP and DEP is provided in the Applicant's response to Q1.9.1.5 within The Applicant's Responses to the Examining Authority's First Written Questions [REP1-036].</p>

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	<ul style="list-style-type: none"> With reference to the ExA Second Written Question WQ2 2.2.1a, the opinion specifically points out the legal shortcomings of the statement by Minister Graham Stuart in his letter of 16th January 2023 We have pointed out previously our view that the National Grid East Anglia GREEN project is linked to the SEP and DEP application and should be considered an associated development. Evidence has been provided to this examination that demonstrates the lack of capacity in the electricity transmission network leading out of Norfolk, especially in the case that Norfolk Vanguard, Boreas and Hornsea Three are constructed as planned- see REPI-176. <p>Please see Opinion from Charles Banner, K.C. in respect of East Anglia GREEN.</p>	<p>Please note that the K.C. Opinion has not been reproduced here but can be found within the Norfolk Parishes Movement for an OTN's original Deadline 4 submission [REP4-054].</p>
2 Comments on Applicants response to WQ2.2.2.1		
2.1	<p>In response to WQ2.2.2.1d, the Applicant argues that no alternative grid connection points were offered to it as an outcome of the CION process. The Applicant then seeks to use this to explain that, as it was not offered any alternatives, it does not have to study any alternatives and, by further extension that, because it has not studied any alternatives, it is not obliged to report on any alternatives to the ExA. The Connection and Infrastructure Options Note (CION) Process, Guidance Note v4.0 (NGESO, November 2018) (the CION guidance) makes clear as follows:</p> <p><i>"Section 2.1 What is the purpose of the CION?</i></p> <p><i>The CION records the output of the work between the Developers, TOs and NGESO to identify the overall economic, efficient and coordinated connection option."</i>(our emphasis in bold).</p> <p>Thus, it is clear that the CION process is inherently designed to identify a single option. The argument from the Applicant that the requirements in the NPS EN-1 and the EIA regulations to consider alternative connection points do not apply is, in our opinion, completely false. The Applicant is wrongly seeking to dress up its failure to carry out its obligations as a responsible</p>	<p>The Applicant notes the comment and does not have anything further to add to that which it submitted in response to Q2.2.2.1 within The Applicant's Responses to the Examining Authority's Second Written Questions [REP3-101].</p> <p>The Applicant notes that the ExA, within The Examining Authority's Third Written Questions [PD-017], has stated that it has no further questions under this topic at this stage.</p>

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	<p>developer to properly study viable alternatives as a matter outside the remit of the ExA.</p>	
2.2	<p>In response to WQ2.2.2.1e, the Applicant has provided some basic information concerning why Walpole was not short-listed for detailed consideration during the CION process. They claim that NGET identified the following issues:</p> <ul style="list-style-type: none"> • Limited space on site • Substation considered 'full' for generation, • Fault level issues and lack of thermal capacity • The seabed routes to Walpole around the Wash were believed to be at capacity with no further available space for more cables. <p>In fact, none of these "issues" stands up to examination. Taking the above points in turn:</p> <ul style="list-style-type: none"> • The ExA will be aware from REPI-145, that the Walpole substation is set in open country - space for the substation could be acquired • National Grid has a record of making statements about lack of capacity at substations only to subsequently change its mind. It is documented that Hornsea Three considered connecting on the Yorkshire coast, alongside Hornsea One and Two, but was told there was no space available. Hornsea Four was then offered a connection there. This is recorded in the examination libraries for Hornsea Three and Four. In fact, Docking Shoal and Hornsea Three were both planned to connect at Walpole in the past and it is difficult to understand why the substation would be considered "full" • Fault level issues and lack of thermal capacity are not insuperable problems and technology exists to resolve them • As we have mentioned previously, we find it extraordinary and frankly outrageous that NGET could not be bothered to research properly the 	<p>The Applicant notes the comment and has nothing further to add at this stage.</p>

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	<p>seabed routes to Walpole. Our information is clear that there are currently just two power lines coming through The Wash.</p> <p>It would seem that no consideration has ever been given to making use of the Sutton Bridge power station.</p> <p>It is apparent that the decision to exclude Walpole as the grid connection point could be based on nothing more than spurious arguments and the self-interest of the three commercial entities involved.</p>	
2.3	<p>In response to WQ2.2.2.lg, the Applicant submits that: "the preferred connection option was Norwich Main and agreed by all the CION parties despite being the second most economic option under the CBA as it carried less deliverability risk".</p> <p>This statement appears to conflict with the statement made by NG ESO in REPI-188: "Following review of the available options during CION process, the route to the Norwich substation provided the shortest cable route and the best performance against the Cost Benefit Assessment and deliverability".</p> <p>Further, it will not have escaped the notice of the ExA that no information has been provided by the Applicant concerning the "most economic" option.</p>	<p>The Applicant does not consider the two statements to be in conflict and offers the following clarification:</p> <p>The statement by NGESO in REP1-188 highlights that, when evaluated against the CBA <u>and</u> deliverability considerations, Norwich Main was assessed as the preferred connection option. It is also the case that Norwich Main was the second-most <u>economic</u> option when considered on the CBA alone.</p> <p>This is detailed more fully in the Applicant's response to Q2.2.2.1 h) within The Applicant's Responses to the Examining Authority's Second Written Questions [REP3-101].</p>
2.4	<p>The Applicant continues to resist providing information to the SEP and DEP examination regarding alternative grid connection points. It is now abundantly clear that the reason for this is most likely that in fact no responsible study of alternatives has been carried out by the Applicant. Certainly, only the most superficial consideration has been given by the Applicant to a grid connection point at Walpole. During the CION process the grounds for dismissing Walpole as an alternative to Norwich Main seem to have been based on an extremely casual approach to obtaining accurate information, an arrogant dismissal of the cumulative impacts on</p>	<p>The Applicant notes the comment and refers to its response to Q2.2.2.1 within The Applicant's Responses to the Examining Authority's Second Written Questions [REP3-101]. The Applicant has nothing further to add at this stage.</p>

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	communities and the environment, and an overriding desire by the parties to satisfy their own self-interest.	
3 Proposal for a question to National Grid ESO concerning the East Anglia GREEN project		
3.1	In view of the fact that the Applicant continues to maintain that it has met the requirement under section 4.9.1 of the NPS EN-1 to ensure that there will be necessary infrastructure and capacity within an existing or planned transmission or distribution network to accommodate the electricity generated by SEP and DEP, we ask that NG ESO provides a detailed explanation for how the electricity from SEP and DEP will be able to contribute to net-zero targets in the event that East Anglia GREEN does not receive planning permission and Norfolk Vanguard, Boreas and Hornsea Three are constructed. What assurance can be provided that the CION connection offer for SEP and DEP is not, in fact, a clear case of pre-determination by NG ESO?	The Applicant notes the comment.