



# Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects

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

**Revision A**  
Deadline 6  
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<b>Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects          Examination submission          The Applicant's comments on Mr Derek Aldous' Deadline 5 Submission</b>	
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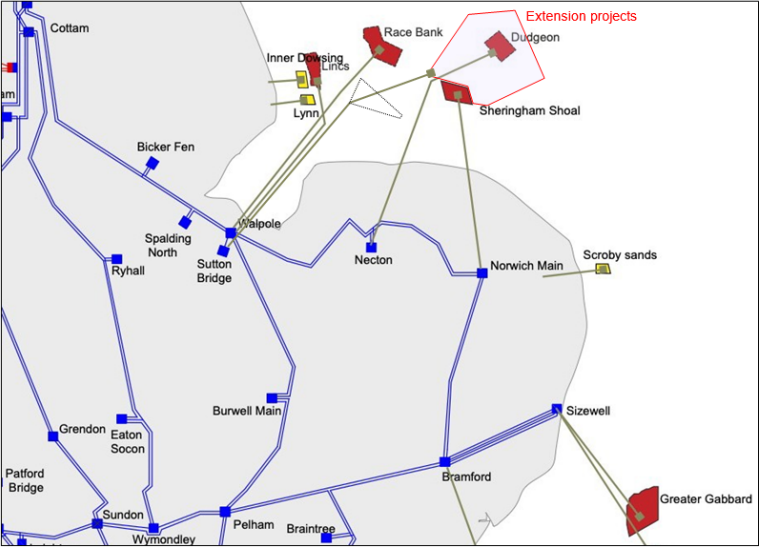
## **1 The Applicant's comments on Mr Derek Aldous' Deadline 5 Submission**

1. This document presents the Applicant's response to Mr Derek Aldous' Deadline 5 submission [REP5-099].

**Table 1 The Applicant's comments on Mr Derek Aldous' Deadline 5 Submission**

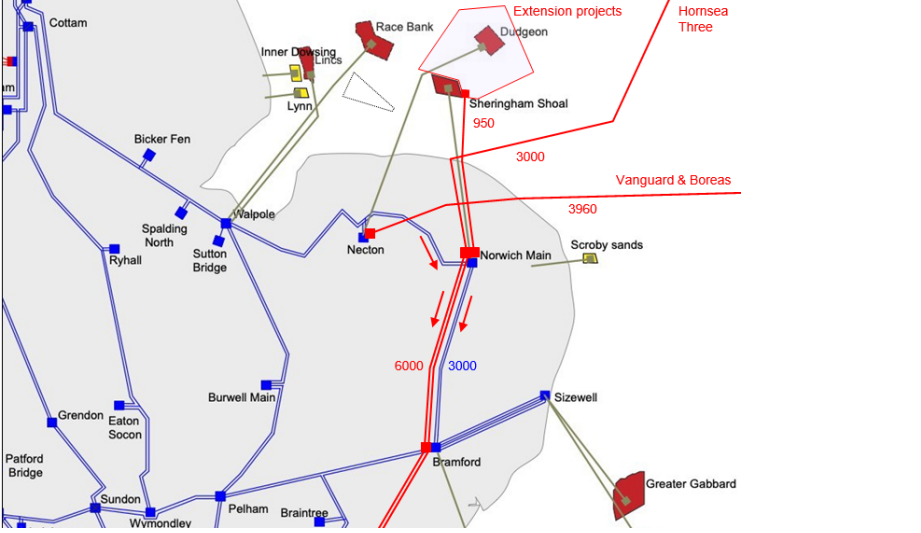
ID	Stakeholder Comment	Applicant Response
<b>Associated development</b>		
<b>Summary</b>		
1	<p>This representation objects to the application as submitted on the grounds that proposed associated development, such as battery storage and a new pylon route, has not been adequately addressed.</p>	<p>The Applicant would reiterate that neither any battery storage proposals nor East Anglia Green are being proposed as “associated development” within the DCO application for SEP and DEP. Section 115 of the Planning Act 2008 provides that, in addition to the development for which development consent is required under Part 3 of the Planning Act 2008, consent may also be granted for associated development. Associated development is defined in the Planning Act 2008 as development which is associated with the principal development and DCLG issued guidance in 2013 (Guidance on associated development applications for major infrastructure projects) (“the AD Guidance”) which provides further information on what may constitute associated development in the context of a DCO application.</p> <p>The AD Guidance makes it clear that it is for applicants to decide whether to include something that could be considered as associated development in an application for development consent or whether to apply for consent for it via other routes.</p> <p>In reference to any battery storage proposals relevant to SEP and DEP, the Applicant refers to its previous response in Table 20, ID 17 to 20 of <a href="#">The Applicant’s Comments on Written Representations</a> [REP2-017], where it is stated that “...the Applicant remains in very early stages of development for a battery storage project... Any proposals remain too early in their maturity to be included within the DCO application for SEP and DEP and, if brought forward, would be subject to a separate planning process with an application made under the Town and Country Planning Act 1990 (as amended). This approach aligns with paragraphs 3.3.28-29 of the consultation draft NPS EN-1 (September 2021 [now March 2023]) on the approach to consenting of battery storage proposals.”</p> <p>Regarding a “new pylon route”, the Applicant assumes this is a reference to the proposed East Anglia Green (EAG) project. The Applicant reiterates that</p>

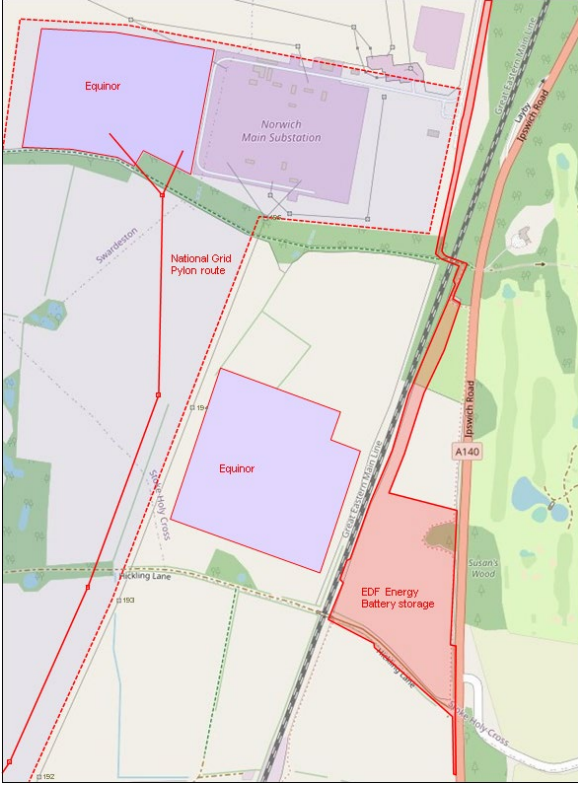
ID	Stakeholder Comment	Applicant Response
		<p>the Grid Connection Agreement for SEP and DEP that was signed in 2019 is not conditional upon the delivery of the EAG project.</p> <p>Further relevant information regarding EAG in the context of SEP and DEP is provided in the Applicant's response to Q1.9.1.5 within <b>The Applicant's Responses to the Examining Authority's First Written Questions</b> [REP1-036].</p> <p>These proposals therefore do not form part of the DCO application for SEP and DEP and will be brought forward separately through their own consenting routes.</p>
2	<p>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.</p>	<p>As stated at ID 2 of <b>The Applicant's Comments on Mr Derek Aldous' Deadline 4 Submission</b> [REP5-055], the draft national policy statements make clear that they are capable of being important and relevant considerations in the decision-making process by the Secretary of State under section 104 of the Planning Act 2008.</p>
<b>Baseline development scenario</b>		
3	<p>Associated development can be minimised using the baseline development scenario shown below.</p> <p>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.</p> <p>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.</p> <p>This scenario is described in more detail in REP3-172, EN010109-001254, pp. 8-12.</p>	<p>The Applicant notes the comment and reiterates that a consideration of grid connection alternatives in this manner is outside the scope of this Examination.</p> <p>The Applicant refers to its response to Q2.2.2.1 d) within <b>The Applicant's Responses to the Examining Authority's Second Written Questions</b> [REP3-101].</p>

ID	Stakeholder Comment	Applicant Response
	 <p>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.</p>	
<b>Associated development scenario</b>		
4	<p>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.</p>	<p>The Applicant notes the comment.</p>
5	<p>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</p>	<p>The Applicant notes that this comment predominantly relates to development that is not linked to the application as submitted.</p> <p>In relation to a coordinated approach and offshore alternatives, the Applicant refers to its response to Q1.2.3.1 within <a href="#">The Applicant's Responses to the Examining Authority's First Written Questions [REP1-036]</a> regarding the Offshore Transmission Network Review process</p>

ID	Stakeholder Comment	Applicant Response
	<p>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.</p>	<p>and SEP and DEP's designation as a 'pathfinder' project, and reiterates the extensive steps taken towards coordinating the two projects as set out in the <b>Scenarios Statement</b> [APP-314].</p>
6	<p>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.</p>	<p>The Applicant refers to its response at ID 1 of this document, as well as its response to Q1.9.1.5 within <b>The Applicant's Responses to the Examining Authority's First Written Questions</b> [REP1-036], where it details why it is inappropriate for SEP and DEP to be considered within a single NSIP application with separate and distinct infrastructure projects such as EAG that are not linked to the application as submitted.</p> <p>The Applicant notes that the paragraph of EN-1 which is quoted in the representation refers to generating stations and "related infrastructure" being consented together where possible. The Applicant would reiterate that neither the battery storage proposals nor East Anglia Green are "related" to SEP and DEP in the way intended to be covered by EN-1 and that those projects are being brought forward separately and on different timelines. Paragraph 4.9.2 of EN-1 also acknowledges that bringing forward projects together in the way suggested may not always be possible or the best course in terms of delivery of a project in a timely way.</p>
7	<p>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.</p>	<p>As noted in <b>Supplementary Information to the Scenarios Statement</b> [REP3-074], the March 2023 consultation draft national policy makes clear that <i>"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"</i> (paragraph 3.2.7 of draft EN-1).</p>
<b>Conclusion</b>		
8	<p>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.</p>	<p>The Applicant notes the comment and refers to its responses above which make it clear that any battery storage proposals and East Anglia Green do not form part of the associated development for which development consent</p>



ID	Stakeholder Comment	Applicant Response
	 <p>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.</p>	<p>is sought for SEP and DEP, nor is it appropriate for those separate projects to be included in the application.</p>
<p><b>Associated development</b></p>		
<p>9</p>	<p>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.</p>	<p>In relation to any battery storage proposal by the Applicant, the Applicant refers to its response at ID 1 of this document.</p> <p>Other battery storage proposals by third parties are addressed in response to Q1.9.1.3 within <a href="#">The Applicant's Responses to the Examining Authority's First Written Questions</a> [REP1-036] with a supporting figure provided at Appendix B.6 of REP1-039.</p>

ID	Stakeholder Comment	Applicant Response
	 <p data-bbox="203 1118 1099 1214">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.</p>	