



Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects

The Applicant's Comments on Mr Derek Aldous' Deadline 7 Submission

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1 The Applicant's Comments on Mr Derek Aldous' Deadline 7 Submission

1. Mr Derek Aldous submitted the following documents at Deadline 7:
 - Onshore environmental impacts [IP 2003 3336 D7/1];
 - Norwich to Tilbury pylon route [IP 2003 3336 D7/2]; and
 - Objection in principle [IP 2003 3336 D7/3].
2. This document presents the Applicant's comments on Mr Derek Aldous' Deadline 7 submissions.

Table 1 The Applicant's Comments on Mr Derek Aldous' Deadline 7 Submission – Post Hearing submission [D1/3]

ID	Mr Derek Aldous Comment	Applicant Response
Onshore environmental impacts		
Summary		
1	This representation objects to the cumulative onshore environmental impacts arising from the grid connection points adopted for Hornsea Three and the Proposed Development (DEP & SEP), and the reality of onshore cable route construction. These cumulative impacts are avoidable and unjustified.	The Applicant notes that the comments at ID 1 to ID 12 of this table predominantly relate to Hornsea Three, a consented development that is not linked to the application as submitted. In general, the Applicant does not consider it appropriate to comment on issues relating to another development but offers some responses on aspects specifically relating to SEP and DEP, where it is considered helpful to do so. The Applicant highlights that it has not reproduced the figures/attachments referred to in the comments; these can be viewed within the original submission [IP 2003 3336 D7/1].
2	By way of example, photographs are included to show the scale of the initial environmental damage at the B1113 road crossing for the Hornsea Three onshore cable route. This location was visited by the Examining Authority during the second Accompanied Site Inspection on 24th March 2023.	
3	An additional photograph of pre-commencement work at the Hornsea Three onshore substation site was included in an earlier representation on 7th March 2023 (REP2-071, EN010109-001070).	
Objection		
4	The photographs overleaf show the removal of mature roadside trees and hedgerows at the B1113 road crossing within the Norwich Southern Bypass Landscape Protection Zone. This environmental destruction will be repeated along most of the Hornsea Three onshore cable route from the landfall point at Weybourne across the county of Norfolk to the onshore converter substation at Swardeston.	As noted above, the Applicant does not consider it appropriate to comment on issues relating to another development; however, in respect of SEP and DEP, the Applicant summarises below the approach with regard to tree and vegetation impact management and mitigation: Requirement 11 (Provision of landscaping) of the draft DCO (Revision K) [document reference 3.1] requires the submission to and approval by the planning authority of a written landscape management plan prior to works commencing. The Landscape Management Plan must accord with the Outline Landscape Management Plan (Revision D) [REP5-031]. Subparagraph (2)(e) requires ' <i>details of existing trees and hedges to be removed and details of existing trees and hedges to be retained, with measures for their protection during the construction period where</i>
5	There is no reasonable expectation that these visual and environmental impacts will be adequately mitigated by landscaping or planting schemes. No landscape mitigation planting is planned directly over the onshore cable route or across the onshore substation site entrance from the B1113.	

ID	Mr Derek Aldous Comment	Applicant Response
		<p><i>applicable and the details provided should be in accordance with British Standard 5837:2012'.</i></p> <p>Paragraph 29 of the Outline Landscape Management Plan commits the Applicant to ensuring that a minimum 1:1 ratio for tree and hedgerow replanting would be achieved.</p> <p>The Outline Landscape Management Plan also refers to the Applicant's voluntary commitment to achieve Biodiversity Net Gain to bolster the diversity of native species that are present locally (paragraph 31).</p> <p>The aim of this dual commitment is to ensure that (a) there is an overall improvement in habitat, and (b) that there is no net loss in the number of trees and the length of hedgerows.</p>
6	<p>Construction traffic and temporary road closures are already causing displacement of local traffic onto unsuitable and less safe country lanes, increasing both journey times and accident risk. These impacts, which will increase with the construction of the haul road and the onshore substation itself, were described by the applicant during the Hornsea Three examination as 'not significant'.</p>	<p>In respect of SEP and DEP, the Applicant refers to Requirement 15 of the draft DCO (Revision K) [document reference 3.1], which secures the Construction Traffic Management Plan that sets out how traffic associated with the projects would be managed to reduce impacts.</p>
7	<p>In the event that the Proposed Development is approved as submitted, it is likely that the same scale of environmental damage will be repeated a short distance to the south of the Hornsea Three road crossing on the B1113. This is because there will be two independent onshore cable routes, running from the same landing point at Weybourne to the same grid connection point at Swardeston.</p>	<p>The Applicant notes the comment and refers to its responses at ID 4 and ID 5 above.</p>
8	<p>In the event that Hornsea Three, Vanguard and Boreas, and the Proposed Development all proceed with their currently planned grid connections, a total distance of more than 150km will be affected in this way by haul road construction and cable trench excavation across the county of Norfolk.</p>	<p>The Applicant notes the comment and refers to its responses at ID 4 and ID 5 above.</p>
<p>Conclusion</p>		

ID	Mr Derek Aldous Comment	Applicant Response
9	In the absence of adequate onward grid transmission capacity, these onshore environmental impacts are not justified by the actual contribution the projects will make to the need for renewable energy.	The Applicant notes the comment and refers to its responses at ID 1 to ID 3 of Table 3.
Norwich Southern Bypass Landscape Protection Zone		
10	The Examining Authority viewed this location as part of its Accompanied Site Inspection on Friday 24th March 2023, prior to the recent removal by the Hornsea Three contractor of the majority of the mature roadside trees and hedgerows shown in Figures 1 and 2 below. The site is located within the Norwich Southern Bypass Landscape Protection Zone established by South Norfolk Council.	The Applicant notes the comment and refers to its responses at ID 4 and ID 5 above.
Hornsea Three onshore cable route		
11	Figure 3 shows the removal of mature roadside trees and hedgerows along the western side of the B1113 and within the Landscape Protection Zone. This corresponds to the 80m wide onshore cable route for Hornsea Three as it arrives from Weybourne. Figure 4 shows the view across the onshore cable route looking southwards. A temporary haul road will be constructed along most of the route.	The Applicant notes the comment and refers to its responses at ID 4 and ID 5 above.
Hornsea Three car park and site entrance		
12	A long stretch of mature roadside trees and hedgerows has been removed on the eastern side of the B1113. Further tree and hedgerow removal will take place to establish highway visibility splays and also to enable Abnormal Indivisible Loads to enter the site. Figure 5 shows the hard standing area recently constructed for staff car parking, and Figure 6 shows site entrance signage on the B1113.	The Applicant notes the comment and refers to its responses at ID 4 and ID 5 above.

Table 2 The Applicant's Comments on Mr Derek Aldous' Deadline 7 Submission - Norwich to Tilbury pylon route [D7/2]

ID	Mr Derek Aldous Comment	Applicant Response
Norwich to Tilbury pylon route		
Summary		
1	<p>This representation objects to the cumulative impacts of the Proposed Development in combination with the Norwich to Tilbury pylon route and the consequential increase in size of the Norwich Main substation. These include cumulative landscape and visual impacts, change of landscape character, additional construction traffic, and the displacement of local traffic onto narrow country lanes.</p>	<p>The Applicant notes the comments at ID 1 to ID 7 of this table and highlights that relevant information regarding the Norwich to Tilbury pylon route (formerly referred to as East Anglia Green) 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> <p>The Norwich to Tilbury pylon route proposals do not form part of the DCO application for SEP and DEP and will be brought forward separately through their own consenting routes.</p> <p>The Applicant highlights that it has not reproduced the figures/attachments referred to in the comments; these can be viewed within the original submission [IP 2003 3336 D7/2].</p>
Cumulative impacts		
2	<p>Given the duties placed on the Secretary of State by the Climate Change Act 2008, and recognising the urgent need for renewable energy, it is reasonable to assume that the maximum project output is required and justified. The applicant has explained that an output of 900MW is feasible and may be adopted post-consent without a material amendment of the DCO, and that in the specific case of a grid connection at Norwich Main, this increased output is dependent upon the Norwich to Tilbury pylon route. The planned expansion of the Norwich Main substation and the start of the pylon route at the grid connection point of the Proposed Development are both shown in the diagram below.</p>	
3	<p>National Grid began its Statutory Consultation for the pylon route DCO application (EN020027) on 27th June 2023 and has published the preferred route alignment and the planned expansion of the Norwich Main substation. This provides sufficient detail for an evaluation of the cumulative effects.</p>	

ID	Mr Derek Aldous Comment	Applicant Response
4	<p>The issue of associated development has already been raised in REP5-099 (EN010109-001678), and the applicant responded in REP6-022 (EN010109-001863). The relationship of the pylon route and substation expansion to the Proposed Development is shown in Attachment 1, which supersedes the corresponding attachment in REP5-099.</p>	
5	<p>Attachment 2 shows the preferred alignment of the pylon route within the county of Norfolk.</p>	
<p>Substation expansion at Norwich Main</p>		
6	<p>The preferred alignment of the proposed Norwich to Tilbury pylon route has now been published by National Grid as part of the Statutory Consultation. The project includes a significant expansion of the existing Norwich Main substation, and overlaps the Proposed Development as shown below.</p> <p>[Attachment 1]</p>	
<p>Norwich to Tilbury pylon route</p>		
7	<p>The Preferred Draft Alignment of the proposed Norwich to Tilbury pylon route in Norfolk extends southwards for approximately 30km as shown below. The proposed route continues to Bramford in Suffolk and finally to Tilbury in Essex, with a total onshore route distance of approximately 180km.</p> <p>[Attachment 2]</p>	

Table 3 The Applicant's Comments on Mr Derek Aldous' Deadline 7 Submission – Objection in principle [D7/3]

ID	Mr Derek Aldous Comment	Applicant Response
Objection in principle		
1	This representation objects to the cumulative impacts of the offshore wind projects proposing to connect to the grid in Norfolk apparently without due consideration of the existing grid capacity.	The Applicant refers to its response to Q1.9.1.5 within The Applicant's Responses to the Examining Authority's First Written Questions [REP1-036], where it highlights that it has a grid connection agreement in place. This agreement is not conditional upon the delivery of the Norwich to Tilbury pylon route (formerly referred to as EAG).
2	The diagram below shows the options now being considered by National Grid to provide onshore transmission capacity for Vanguard, Boreas and Hornsea Three. It also illustrates National Grid's approach to the consideration and description of alternatives. From the options described, National Grid has carried forward the Norwich to Tilbury pylon route and other onshore reinforcements. It has already been shown in the IOTP (East) Feasibility Study of August 2015 that this does not lead to a 'least worst regret' outcome, and may be the worst possible result for the electricity consumer.	The Applicant highlights that it has not reproduced the figures/attachments referred to in the comments; these can be viewed within the original submission [IP 2003 3336 D7/3].
3	It is also apparent that the existence of a grid connection agreement does not imply that the actual contribution of a project to the need for renewable energy has been demonstrated, or that there is a compelling public interest to justify Compulsory Acquisition, or that there exist Imperative Reasons of Overriding Public Interest (IROPI) for the purposes of a Habitats Regulations Assessment. This conclusion applies equally to Vanguard, Boreas and Hornsea Three, and the Proposed Development.	As noted in Supplementary Information to the Scenarios Statement [REP3-074], 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 Applicant also refers to the Section 4 of the Planning Statement (Revision B) [AS-031] regarding the need for the project, and Section 5 of Habitats Regulations Derogation - Provision Evidence [APP-063] regarding IROPI considerations.