

Date: 31 January 2024

Ref: EN010109

Department for Energy Security and Net Zero
3-8 Whitehall Place
London
SW1A 2AW

Request for Comment per your letter dated 23 January 2024 with reference to the Application by Equinor New Energy Limited (“the Applicant”) for an Order granting Development Consent for the proposed Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects (“the Proposed Development”)

On behalf of the Norfolk Parishes Movement for an Offshore Transmission Network (“The Norfolk Parishes Movement”) we wish to make three points:

- 1) We refer to the submission by Natural England entitled “Appendix 2: Schedule of Mitigation and Route Map” (EN010109-002266) and note the numerous concerns highlighted and mitigations required. These complement the considerable concerns expressed by the Norfolk Parishes Movement during the Planning Inspectorate examination. It is self-evident that the use of a shorter cable route from the coast to a suitable substation location would minimise the environmental impacts and damage to communities. Our submissions to the Examination (REP1-145, REP2-066, REP3-151) have detailed the benefits of the 11 km cable path required for a grid connection at Walpole versus the 60 km path to Norwich Main.
- 2) The applicant has sought to deflect objections to the cable path route for the Proposed Development by claiming that, as it is a Nationally Significant Infrastructure Project, there is no need to consider alternative grid connections and anyway the grid connection point was determined via the CION process which is confidential and outside the scope of the examination. This is patent nonsense (REP3-152, REP4-054). It cannot be right that the key factor governing the onshore impacts is determined in secret, by parties with vested commercial interest and which alone have the responsibility for providing the environmental and community impact information on which the decision is based. Consideration of alternatives is a requirement of the Planning Inspectorate rules concerning the Environmental Impact Assessment and indeed, your Minister Andrew Bowie has publicly stated (REP8-124) that developers must have “fairly considered alternatives”. It is also clear that the development, if it proceeds, will result in considerable public expense in transferring the electricity from the onshore substation to where it is needed in London and the South-East and yet it appears the Treasury Green Book principles have not been applied in determining the onshore cable path (REP7-102).
- 3) The Norfolk Parishes Movement has consistently highlighted its concern over the cumulative impacts of the Proposed Development (REP1-144, REP3-150). Many communities in Norfolk are already facing years of disruption by successive developments of approved offshore windfarm projects (Hornsea Three, Norfolk Vanguard and Boreas) which will drive cable paths through the county. The nightmare for these communities will be accentuated over an even longer period if the Proposed Development goes ahead with a grid connection 60km inland, and especially if sequential development is allowed. The developers’ claims to the previous Planning Examinations, and their “mitigation strategies”, are already proving to be unreliable or false and it is the environment and local communities which are bearing the cost of this. Please keep in mind the Proposed Development would deliver considerably **less than one per cent** of the projected UK energy needs (REP2-066).

We respectfully urge the Secretary of State to reject the onshore part of this Proposed Development and to encourage connection to the national grid at Walpole.