

WRITTEN REPRESENTATION

GRID CONNECTION POINT

Deadline 1: 20th FEBRUARY 2023

Norfolk Parishes Movement for an OTN

Summary

On behalf of the Norfolk Parishes Movement for an Offshore Transmission Network, we set out below our argument for an alternative grid connection point for the SEP and DEP projects. We believe strongly that the currently proposed connection to the grid at Norwich Main should be refused. An alternative grid connection, possibly at Walpole, should be proposed by the applicant for these projects. We address the cumulative impacts of the current proposal, the suitability of Walpole and consider precedents set by other planning applications. We believe the cumulative impacts of this DCO application with other radial connection projects make it an exceptional case and justify an alternative grid connection point for SEP and DEP.

Madam Chair, on behalf of the Norfolk Parishes Movement for an Offshore Transmission Network (OTN) I would like to set out for the ExA our rationale for a change of the grid connection point for the SEP and DEP projects.

As you are aware, there is an obligation under NPS EN1 section 4.4.2 for the DCO Applicant to provide information about the main alternatives they have studied and this should include an indication of the main reasons for their choice taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility. The DCO application does not refer to the selection by National Grid and the Applicant of Norwich Main as the grid connection point for the projects and we are therefore heartened that the ExA Rule 8 letter sets out your expectations in this regard.

We set out below our argument for an alternative grid connection point for these projects and we address the cumulative impacts of the current proposal, the suitability of Walpole and consider precedents set by other planning applications which we believe justify an alternative grid connection point for SEP and DEP.

Introduction

Norfolk is a proud county which has an employment heritage in agriculture and tourism. In general, it has a low population density, with those over the age of 65 significantly higher than the national average. It is valued by its residents for its rural communities, its natural amenities and the slower pace of life and is sought out by many as a place to retire to. It is not surprising therefore for people to be concerned about a major infrastructure project which disturbs their lives and livelihoods. However, there is complete dismay in our communities at the current proposals for the SEP and DEP projects and the potential for yet another two cable paths, separated temporally, to be driven 60 km through Norfolk. These projects represent a lightning rod for the anger felt in the community over

the continued abuse of our local environment by developers and the impact on the well-being of our parishioners which is caused by the successive radial connection of offshore windfarm projects.

What has united an unprecedented 96 Parish Councils across Norfolk to campaign against radial connections and for an Offshore Transmission Network is the sheer stupidity of the current approach, when a better alternative is readily apparent and is being proposed elsewhere in the country, and the complete disregard by developers and government for the people of Norfolk. We will address the logic of an OTN in a separate Written Representation, however, we would like to focus here on the grid connection point.

The Cumulative Impact of SEP and DEP connected via Norwich Main

With regard to the proposed use of Norwich Main as the grid connection point for the SEP and DEP projects, we hope that the ExA will have gained an insight into the main concerns of the Parish Councils from the representations made during the Open Floor Hearing on 17th January and the Issue Specific Hearing on 20th January 2023. Nevertheless, we would like to reiterate some key points.

Parish Councillors are unsalaried, elected individuals who volunteer their time and experience to represent the interests of their parishioners to the best of their ability. They are dedicated and conscientious. They are of course aware of the need to address climate change issues and generally support the replacement of fossil fuels for generating electricity by greener alternatives including wind power. They expect, however, the government to oversee the switch through appropriate regulation to ensure it happens in a logical manner that actually reduces emissions and minimises impacts on the environment and communities. Sadly, this has simply not happened in Norfolk.

Parish Councils have been burdened by having to review and comment upon planning applications for successive NSIPs relating to the radial connection of offshore windfarms. Most Parish Councillors have striven diligently to assess the tens of thousands of pages of documentation submitted by developers at the statutory consultation phases. Not only this but they have had to deal with a barrage of concerns from their parishioners and then had to attend numerous council and working party meetings to formulate a response on behalf of the people they represent whilst also carrying out all the other aspects of their roles as elected representatives of their communities.

Most Parish Councils along the proposed cable path route have discussed concerns from parishioners relating to:

- The volume and effect of construction traffic, especially HGVs but also abnormal indivisible loads
- The interaction of the cable path construction with other roadbuilding projects
- Displaced traffic and the use of “rat runs” through villages, including displaced commuter traffic and school runs, seasonal agricultural haulage and tourism traffic
- Delayed access of emergency services during construction
- Construction effects such as noise and air quality
- Disruption to peoples’ everyday lives
- Damage to tourism and businesses
- Impact on the environment and ecology – especially longer-term effects such as scarring of the landscape, destruction or displacement of wildlife colonies and the visual impact and enormous footprint of the Norwich Main substation when taken in conjunction with Hornsea Three
- Permanent damage to agricultural land drainage

- Disturbance to water courses above and below ground
- Consequential and associated developments such as East Anglia GREEN and battery storage facilities
- The effect of all of the above, sustained over many years of construction, on individuals' health and well-being.

Parish Councils and the communities they represent have been worn out by constantly dealing with, worrying about and resisting the bad design of these radial connection projects. They have become disillusioned by the failure of the County Council to properly assess the developers' proposals or to represent the people of Norfolk and by a planning process which has always resulted in these projects being approved. The Secretary of State has often overruled the objections of his own Planning Inspectorate and tinkered with the subjective assessments of impact to justify what has come to look like a pre-determined opinion. Many individuals in Norfolk combined to pay for a Judicial Review of the decision with regard to the Vattenfall Norfolk Vanguard project. This was in fact successful but ultimately, on re-determination, the developers have again been awarded planning consent by the Secretary of State. The people of Norfolk, devoid of funds to pay for a prohibitively expensive further Judicial Review, have been left with no redress.

Each new radial connection through Norfolk compounds the effects of the above issues. As mentioned at the OFH on 17th January, for some Parishes the digging up of cable paths for SEP and DEP could be the 6th and 7th occasions that such paths have been dug through, or very close to, their community and often through valuable and productive family farms.

In view of the adverse effects which have been set out above, and in particular the combination of impacts that result from the landfall some 60 km from the Norwich Main substation through the very heart of Norfolk, and the close association of the proposed cable route with other approved radial connections, we strongly believe it is only possible to conclude, in the exceptional circumstances of this particular application, that more appropriate alternatives to connection at Norwich Main must be considered.

The issue of suitable compensation has been raised by the ExA and was also addressed by Professor Tony Barnett during the Open Floor Hearing of 17th January 2023. We would like to add that, in the vast majority of instances we are aware of where representations have been made to Parish Councils, people are first and foremost concerned about the impact on the land, their way of life and their livelihoods and any compensation is effectively irrelevant to their concerns.

All of the cumulative impacts from the SEP and DEP projects would of course be removed if these windfarms were to connect into the grid at a different location not requiring a 60 km onshore route.

An Alternative connection point via Walpole

Historically electricity has been brought into Norfolk from the main North-South transmission grid via Walpole. Walpole on the border with Lincolnshire is approximately 11km from the coast and lies close to the River Nene and The Wash. The Walpole electricity substation is one of only two grid supply points in Norfolk. From Walpole, there is a 'double circuit' pylon route via Necton to Norwich Main at Dunston and another pylon route heads South from Walpole to Pelham.

The already operational 580MW Race Bank offshore windfarm developed by Ørsted is located in the Greater Wash region, approximately 27km off the UK east coast. The electricity generated by the windfarm is being delivered to the onshore substation at Walpole using export cables through The Wash. The cables have a landfall east of the Nene River and approximately 3.7 miles north-northeast of Sutton Bridge. Cables are buried onshore for 6.8 miles from the landfall point to an extension site located directly adjacent to the existing substation at Walpole.

The substation is in open fields with room for further expansion to accommodate the SEP and DEP projects and it might even be possible to bring cables from the offshore windfarms ashore via the riverbed of the Nene. The now abandoned project for the Docking Shoal windfarm was set to connect to the grid via Walpole and 2,000MW capacity was previously allocated there for Hornsea Three. Thus, there is clearly the technical feasibility to connect the 786MW from SEP and DEP into Walpole substation.

A different option is to connect the offshore cables via The Wash to the mothballed CCGT electricity generation plant at Sutton Bridge. This plant which lies between the Walpole substation and the coast was built in 1999 and closed in 2020. The power generation capacity of the plant is approx. 819MW and the export cables from the plant, which are already in place, run to Walpole substation and would be capable of taking the power from SEP and DEP. Use of this site for connection of SEP and DEP might have the additional benefit of making the CCGT plant economically viable again.

We acknowledge that cables bringing power from the offshore windfarms to Walpole would need to be brought ashore via the environmentally sensitive Wash. However, the current DCO for SEP and DEP requires driving the offshore cable through a Marine Conservation Zone and the unique Cromer Shoal Chalk Beds (CSCB). In addition, onshore the cable will be laid through the North Norfolk AONB and this contrasts with the estuary of the river Nene which is not a designated AONB.

There are concerns and objections from various conservation bodies regarding yet another cable path being laid through the CSCB. The only alternative that the Applicant discusses in their Environmental statement, besides the discounted Bacton option for landfall, is one in which the cables from the offshore windfarms are diverted through The Wash and then connected to the grid at Norwich Main. Clearly, this makes little sense as the cable path footprint will be significantly larger than connecting via Weybourne. No proper detailed analysis of environmental impacts of the cable route through The Wash with a connection to the grid at Walpole has been done for SEP and DEP, although this was successfully completed for Race Bank, Lincs and Docking Shoal. We suggest it is difficult therefore for the ExA to decide the overall planning balance of the Applicant's proposal without this information which should take into account all impacts of the project, including those on communities.

Natural England has raised concerns about routing cables through the MCZ and CSCB and has also indicated that an alternative cable routing might be considered (section 6.1.3, App-089, page 20/21):

“Natural England notes the decision to avoid routing potential cable corridors through the Wash and North Norfolk Coast SAC in light of its status being changed to unfavourable condition. However, the unfavourable condition of some site features doesn't preclude the cable from going through the SAC. But it does provide context in relation to any risk-based judgements that may need to be made in relation to the significance of any impacts and thus mitigation measures required.”

Similarly, objections have been raised by both The Wildlife Trust (section 5.6, App-077, page 56):

“TWT is disappointed that there has been no SNCB engagement in the identification of the grid connection for Sheringham and Dudgeon Offshore Wind Farm Extensions. The alternatives test in section 126(7) and (8) of the Marine and Coastal Access Act is an important consideration in the MCZ assessment process. If alternatives are available that could deliver the projects in a different manner or different location which would result in reduced impacts, these must be considered.” and by the Marine and Maritime Organisation (section 6.1.3, App-089, page 20/21):

“The Applicant has outlined their rationale for the landfall site selection, identifying the geographical exclusion of locations within the North Norfolk Coast Special Area of Conservation (SAC). Exclusion is on the basis that the SAC’s condition status is Unfavourable. As such, the Applicant’s two proposed landfall options pass through the Cromer Shoal Marine Conservation Zone (MCZ).

Whilst it is acknowledged that proposals passing through any Marine Protected Area (MPA) may be challenging, the MMO strongly recommends the Applicant investigate landfall options within the North Norfolk Coast SAC as an alternative route outside of Cromer Shoal Chalk Reef MCZ to a landfall site at Weybourne. The condition status of Unfavourable does not preclude cabling through the SAC as an option and could warrant further exploration.” and both organisations have clearly asked the Applicant to consider alternative routes.

We also note that Natural England considers the impact of a project such as SEP and DEP on the MCZ and the CSCB to be equivalent in scale to that of the cable being routed through The Wash and North Norfolk SAC (section 5.6, App-077, page 44):

“Please be advised that Natural England considered the significance of the HP3 impacts to the MCZ features to be of a similar scale to that of the Wash and North Norfolk Coast SAC. Therefore, our view is that there is no distinction between the rationale for requiring compensation for impacts in the SAC to that of requiring MEEB in the MCZ.”

Unfortunately, there will be environmental impacts whether the cable route makes landfall at Weybourne or in The Wash. However, to justify selection of one by using the impacts in the other, as has been done by the applicant, appears to us to be ridiculous. Furthermore, the other reasons provided by the applicant for the selection of landfall at Weybourne are less than robust. The Applicant cites that the cable path footprint is shorter via Weybourne compared to landfall in The Wash but this is only relevant if the grid connection point is Norwich Main. If Walpole is used the onshore cable route is significantly shorter. The Applicant also seeks to justify the Weybourne landfall by stating the cable route is close to, and parallel with, the existing Dudgeon Offshore windfarm cable, but we submit that this is not a justification but merely a perceived benefit by the Applicant.

We ask the ExA to consider visiting the Walpole substation and the Sutton Bridge Power station as part of a site visit to gain further insight into the suitability of this location.

Other Considerations

We believe that there are multiple grounds for the rejection of this DCO application and the ExA has already highlighted a number of these in the Rule 8 letter. There is a clear precedent for refusal of this application set by the Docking Shoal offshore windfarm decision which emphasised cumulative impacts for offshore considerations, and we ask for equal weight to be given now to the effects on onshore communities.

Furthermore, the need, in exceptional circumstances, to give proper consideration to alternative grid connection points has had a precedent set by the Secretary of State with regard to the more recent Aquind interconnector decision. The Applicant for SEP and DEP has so far not provided any data to properly justify the selection of Norwich Main over any other alternative.

Our campaign group recognises the need for renewable energy, supports the development of offshore wind and calls for it to be implemented in a logical way that maximises the benefits and minimises the impact on the environment and our communities. If the need for the energy from SEP and DEP is truly justified, we would respectfully request that the ExA considers a split DCO decision.

This would entail the ExA recommending to the Secretary of State approval of the offshore wind turbines and platforms and the subsea cables from the Dudgeon extension as far as Sheringham Shoal, and refusal of the rest of the export cable to the landfall point, the onshore cable path, construction compound and the onshore substation at Norwich Main.

The Applicant would then have the possibility to re-submit its DCO application with the more appropriate grid connection point. There are precedents for this type of split approach with the Triton Knoll offshore windfarm which was approved as two separate DCO applications and it was also proposed for the East Anglia One North & Two projects, including letters (available on request) from Therese Coffey MP to the Planning Inspectorate in May and June 2021.

Conclusion

There is now in East Anglia, a groundswell of public outrage and bitter opposition to the continued radial connections through Norfolk. People have lost faith in the system that allows this madness to continue. The DCO application before the ExA, with its significant omissions, its unsubstantiated assertions and its suspiciously flexible wording is, we believe, a consequence of that failed system that has bred an arrogant, dismissive approach by developers to any meaningful engagement with their plans based on the misplaced confidence that whatever project they request will be approved due to “the need for renewable energy”.

We are not aware of any technical or environmental reasons why an alternative grid connection point to Norwich Main should not be considered for SEP and DEP. On the contrary, the considerable burden already laid on the people of Norfolk, which would be added to by the DCO application before this Examination, makes it imperative that an alternative grid connection point is sought.

We understand that it is not the ExA’s responsibility to determine which grid connection point would, on balance, be the best. We too cannot say with complete confidence whether a connection at Walpole, or elsewhere, is the best option for SEP and DEP. However, what we can say is that their connection at Norwich Main will have another major impact on communities in Norfolk, cause many years of disruption and its cumulative effects will last a lifetime. We believe the sheer weight of this argument leads to the inescapable conclusion that this DCO application represents an exceptional case which demands the proper examination and selection of an alternative grid connection point.