

Oulton
Norfolk

20th November 2023

Rt Hon Claire Coutinho MP
Secretary of State

Department for Energy Security and Net Zero

Dear Ms Coutinho

Re: Application by Equinor New Energy Ltd for an Order granting Development Consent for the Sheringham and Dudgeon Extension Projects - *new evidence*

Representation on behalf of the Norfolk Parishes Movement for an OTN, a single-issue grouping of 96 Parish and Town Councils in Norfolk dedicated to the promotion of better strategic planning of the national transition to renewable energy.

We are writing to you today to draw your attention to a serious situation that has recently developed in North Norfolk, which has a direct bearing on your consideration of whether or not to consent the SEP/DEP application in its current form.

Local people, farmers and landowners have been horrified in recent weeks to observe the catastrophic silting of the River Glaven - a rare chalk stream - due to the onshore cable-trench construction activities for Orsted's Hornsea 3 offshore wind farm project.

Please see the first 3 links attached below.

This extreme environmental degradation of The River Glaven has been caused by the run-off of stored topsoils and exposed subsoils from Orsted's cable trench flowing into the river during recent torrential downpours. Torrential downpours, of course, are becoming ever more frequent. This silting event is a disaster not only for the river and lake ecosystems but also for the farmers and landowners, who are having to watch helplessly as their precious topsoil is washed away down to the sea.

Orsted has pledged to use Horizontal Directional Drilling under the rivers themselves. However, in light of the unintended consequence of what has happened to the Glaven, the major concern right now is the danger of significant amounts of topsoil, stored in heaps for up to 2 years and lining the route of the cable corridor along its entire length, ***continuing*** to be washed indirectly and directly into rivers, but especially via the crossing points. During heavy rain, the open scar of a wide cable corridor is turned temporarily into an accidental canal, disrupting traditional field drainage systems and carrying silt down into river valleys.

At this moment The Norfolk Rivers Trust and the Environment Agency are engaged in a series of urgent meetings with Orsted, to discuss how to prevent this scenario from happening again and again, down the whole 60km length of their cable trench to Norwich Main.

It would appear that it is too late now to save the River Glaven but we fervently hope that it is not too late to prevent SEP/DEP from being permitted to add to this catastrophe.

There are only 210 chalk streams *in the world*, 160 of which are in the UK, and most of the lowland ones are to be found **in Norfolk**. They include the Rivers Bure, Glaven and Wensum and their tributaries: Scarrow Beck, the River Tud, the River Tiffey and others - all of which flow ultimately into the River Yare, which opens into the Norfolk Broads.

All of these rivers and watercourses are proposed to be crossed by the route of the SEP/DEP cable trench.

Often referred to as 'England's rainforests', chalk streams have huge ecological and biodiversity value. They spring from underground chalk reservoirs, their clear, shallow waters making them havens for critically endangered species. The longest and most significant is the River Wensum, the most protected river in Europe – it has Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC) status for its entire length. Chalk streams are irreplaceable and were created as the ice sheets retreated 10,000 years ago, depositing enormous quantities of the distinctive gravels that still occupy the riverbeds. These gravels are vital as, amongst other things, spawning grounds for key fish species. In the Glaven, they are now, because of Orsted's activities, almost entirely covered by silt, often to a depth of 50 cm.

We have participated fully in the NSIP public examination processes for Hornsea 3, Norfolk Vanguard and Boreas.

During the same process for Equinor's application for SEP/DEP, we have argued strenuously, right from the start, for consideration of a feasible alternative to yet another 60 km onshore cable corridor (the third in Norfolk), namely that these particular wind farm extensions could and should be connected to the onshore grid at either the mothballed Sutton Bridge power station, or directly into Walpole. Jerome Mayhew MP also argued forcefully for this approach to be considered, at the first Open Floor Hearing. The Examining Authority were interested in hearing more about this alternative and asked us to provide further information - which we did. Please see attachment 4 below.

A connection at Walpole would eliminate, at a stroke, almost all of the onshore environmental damage that would otherwise be caused by the current plan for a 60km cable trench to Norwich Main.

We trust that you will wish to support your government's priority and policy of protecting chalk streams, as detailed in the Levelling up and Regeneration Bill (recently granted Royal assent) by not allowing further unnecessary cable-laying in Norfolk, when a feasible and cost-effective alternative grid connection is known to exist. A government amendment to

strengthen this policy protection was announced on 21st September 2023 by Defra and forms part of the government's Plan for Water. Please see link 5, attached below.

It is too late now to save the River Glaven, but we urge you not to permit the potential for a similar ecological disaster to occur to the Rivers Bure and Wensum.

We make this further representation to you now - *in light of this recent evidence of catastrophic loss of topsoils and degradation of chalk-stream rivers by Orsted* - and recommend strongly that you consider a **split decision** in the case of SEP/DEP, approving the offshore wind farm plans, but refusing the onshore plans until the Applicant has re-negotiated with National Grid an alternative grid connection at Walpole.

We thank you for your consideration of this urgent matter.

Yours sincerely,

Alison Shaw *Oulton Parish Councillor*

Sandra Betts *Barford with Wramplingham Parish Councillor*

pp The Norfolk Parishes Movement for an OTN

Attachments:

1. Twitter post by Prof. Carl Sayer of UCL on 25th October - Major silting up of the River Glaven, due to Orsted's cable trenching:
<https://x.com/carlsayerUCL/status/1717188019403272197?s=20>

2. River Glaven silting - report on the BBC news 12th October:
<https://www.bbc.co.uk/news/uk-england-norfolk-67065750>

3. Article in North Norfolk News 30th October - Wind farm project blamed for destroying Norfolk river:

4. Representation submitted to the NSIP public examination of SEP/DEP on 27th March 2023, illustrating the feasibility of an alternative grid connection at Sutton Bridge/Walpole:

5. [Changes announced to better protect England's chalk streams - Defra in the media \(blog.gov.uk\)](https://blog.gov.uk)
