

From: [REDACTED]
To: NorfolkVanguard@pins.gsi.gov.uk
Cc: [REDACTED] Parish Clerk
Subject: VATTENFALL - NORFOLK VANGUARD: submission from Oulton Parish Council - RI number: 20012656
Date: 02 May 2019 15:41:24

VATTENFALL: Norfolk Vanguard

Please find below the text of the oral representation made by Alison Shaw on behalf of Oulton Parish Council at the Open Floor Hearing in Dereham on 24th April 2019.

Oulton Parish Council: text of oral submission at the Open Floor Hearing on April 24th 2019

Oulton Parish Council (OPC) has submitted written representations to every Deadline throughout the Examination processes for both the wind farm projects of Orsted and Vattenfall. We have also attended many Hearings.

Sadly, we are now much more alarmed at the end of this process than we were at the beginning.

In its closing remarks to the Examining Authority for Hornsea Project Three, Oulton Parish Council reiterated its **support** for the offshore wind farm but suggested that, in view of the severe adverse impacts of the **onshore cabling**, a **design alternative** for that part of the project should be considered – that of connecting **this** and all other offshore wind farms to the national grid via an **offshore ring main – an ORM**.

OPC is now concerned that the **Examining Authority for Norfolk Vanguard** is unlikely to be aware of the **remarkable degree of support** that this design alternative has gathered over the past six months, as the Examination has uncovered the real scale of the impacts of this proposal on the natural environment and the communities of Norfolk.

On 18th February 2019, Oulton Parish Council sent a letter to five rural Norfolk MPs. The letter outlined the problem, suggested the solution of an ORM, and exhorted the MPs to approach the Secretary of State to request a re-consideration of the grid connection arrangements for these projects. This letter will be attached to our written submission at Deadline 7 (Appendix 1), but we draw the Panel's attention now to the fact that this letter was co-signed by:

--[if !supportLists]-->• <!--[endif]-->**23 Parish Councils along the whole length of the cable corridors for both projects;**
--[if !supportLists]-->• <!--[endif]-->**Norfolk County Councillors;**
--[if !supportLists]-->• <!--[endif]-->**action groups;**
--[if !supportLists]-->• <!--[endif]-->**landowners and farm managers;**
--[if !supportLists]-->• <!--[endif]-->**and the CPRE.**

George Freeman MP responded immediately and, on 11th March, conducted a debate in parliament on this very issue. The Minister from BEIS who responded commented that: "it is absolutely right that...we now consider the potential to connect adjacent projects **offshore, linking them up...as a ring main.**"

Keith Simpson MP forwarded the letter of 18th February to the Senior Development Managers of both projects, for their comments.

Stuart Livesey of Orsted replied:

"The letter raises the possibility of a more strategic approach with regards to the transmission grid....**This is certainly an interesting concept and one that deserves further consideration.**

(However...) The current regulatory framework requires the wind farm developer to work with National Grid....."

Ruari Lean from Vattenfall replied on 15th April:

"Government and the offshore wind industry have acknowledged...that there is a case for co-ordinated offshore wind grid development as our sector continues to grow in the UK...[but]... **we must work within the constraints of the current regulatory framework**".

And so we learn that these developers are constrained by the current regime **to dig up Norfolk whether they want to or not**, in order to connect to the national grid.

It should be noted that, because of the considerable time saved – in years – by not having to construct lengthy onshore cable corridors, the projects are unlikely to suffer much delay while an ORM is installed.

To summarise:

--[if !supportLists]-->• the Senior Development Managers for both projects **are not averse to the concept of an ORM;**
--[if !supportLists]-->• <!--[endif]-->the Minister at the Dept. for BEIS considers an ORM to be **the right next step;**
--[if !supportLists]-->• <!--[endif]-->the Norfolk MPs, many county and district councillors and Parish Councils all along the cable routes now see an **ORM as the only solution;**
--[if !supportLists]-->• <!--[endif]-->and the residents are **absolutely desperate for it.**

So what is standing in its way?

Only the government can intervene in this situation to promote discussions between government, National Grid, and the developers, regarding an ORM.

The current situation is a regulatory stalemate that will otherwise result **in the environmental devastation that we are about to see unleashed on the whole of rural Norfolk by Orsted and Vattenfall.**

Although this design alternative was submitted early on in this Examination process, it would appear that it has not yet been given serious consideration. There are obvious reasons why this might be the case.

It is, of course, an axiom of the planning process that it is only ever able to consider "the application that is put in front of it." The Panels for both these wind farm Examinations have, however, *rightly* interpreted their remit on this occasion to include also an assessment of the cumulative impact of the *other* major project currently going through the planning process. We have greatly appreciated the approach of the Panels in their forensic examination of the combined impacts of these projects on onshore communities.

Because of the need for a national transition to renewable energy, many more of these projects will be asking for consent to dig up East Anglia in the very near future.

We fully understand that it is not within the remit or the gift of the Examining Authority to enable the construction of an offshore ring main. However, the ExA is uniquely placed to **recommend** to the Secretary of State an active consideration of such a solution to the many and intractable problems generated onshore by the current grid connection arrangements.

Exceptional times call for exceptional measures.

At a time of global crisis over the impacts of climate change, it is appropriate to consider accepting sacrifice. However, it seems unreasonable to require Norfolk to bear the brunt of an entirely *unnecessary* sacrifice, simply for the lack of strategic central planning.

There is a better - and a much 'greener' - way of doing this.

Alison Shaw
Oulton Parish Council

Appendix 1:

Letter to Norfolk MPs

18th February 2019

To: George Freeman MP, Norman Lamb MP, Keith Simpson MP, Richard Bacon MP, Liz Truss MP

Dear Member of Parliament for Norfolk,

Re: **Offshore windfarm grid connections – an alternative proposal**

We, the undersigned, are writing to you today to draw your attention to a serious situation taking shape in Norfolk, and to request your assistance.

You will be aware that two Nationally Significant Infrastructure Projects (NSIPs), with massive implications for Norfolk, are currently under examination by the Planning Inspectorate and are likely to be determined by the Secretary of State for Business Energy and Industrial Strategy by the end of this year. Orsted's Hornsea Project Three and Vattenfall's Norfolk Vanguard (soon to be followed by Boreas) will bring onshore electricity generated by offshore windfarms with an output equivalent to that of five Sizewell nuclear power stations.

The scale of these projects is unprecedented.

Between them, these NSIPs will necessitate the digging of two wide cable trenches North-South and East-West across the Norfolk countryside for a total of 115 kilometres. The construction of these trenches and the enormous substations, converter stations and booster stations that have to be built along them will have an immense detrimental impact on Norfolk's natural environment, agriculture, tourism, business, and residential amenity.

The people of Norfolk are only just waking up to the nature of the colossal impacts they are about to experience over a period of anything up to 8 years - and beyond, as further offshore windfarms are waiting in the wings.

The signatories to this letter understand the need for renewable energy and support the use of offshore windfarms as part of Britain's lower-carbon energy mix. What we struggle to accept is the need for the environment of Norfolk to be so thoroughly devastated by one single aspect of these plans - the grid connection arrangements - which could be executed entirely differently.

The necessity for 115 km of cable trenches across Norfolk and enormous sub- and booster stations is entirely dictated by National Grid's allocation of grid connection points inland at Necton and Swardeston. The need for this onshore disruption would be completely obviated if an alternative proposal were implemented, namely - the construction of an offshore ring main (ORM). Such a ring main could encircle the coast of East Anglia, avoiding any Marine Conservation Zone, and all current and future offshore windfarm developments could connect to it by means of offshore substations.

This ORM proposal has been worked on over many months by a Norfolk resident living close to the cable crossover point shared by these two projects. A statement outlining the proposal, and including a comprehensive graphic illustration, is attached below.

It would seem that at the moment nobody has the responsibility, foresight or inclination to coordinate the UK's major transition from fossil-fuel generated energy to renewable energy - and this situation has to change. There is an acute need for strategic policy thinking at the heart of government.

We urge you all, as rural Norfolk's representatives at Westminster, to liaise on this issue and to discuss this alternative proposal with the Secretary of State, as a matter of urgency.

Thank you for your consideration of this matter.

Signed:

Alison Shaw
Oulton Parish Councillor

Co-signed:

Oulton PC
Edgefield PC
Corpusy and Saxthorpe PC
Wood Dalling PC
C. Barratt, Chair, Heydon Parish Meeting
B. Schuil, Chair, Cawston PC
J. Greves, Chair, Salle PC
Kelling PC
R. Johnson, Chair, High Kelling PC
Mulbarton PC
Swardeston PC

Happisburgh PC
Ingworth PC
Bradenham PC
Holme Hale PC

Necton PC
Weybourne PC
Blickling PC
Fransham PC
East Ruston PC
Garvestone, Reymerston and Thuxton PC
Aylsham Town Council
Swannington, with Alderford & Lt. Witchingham PC

Necton Substation Action Group
Happisburgh REACT

Greg Peck, Norfolk County Councillor
Steffan Aquarone, Norfolk County Councillor

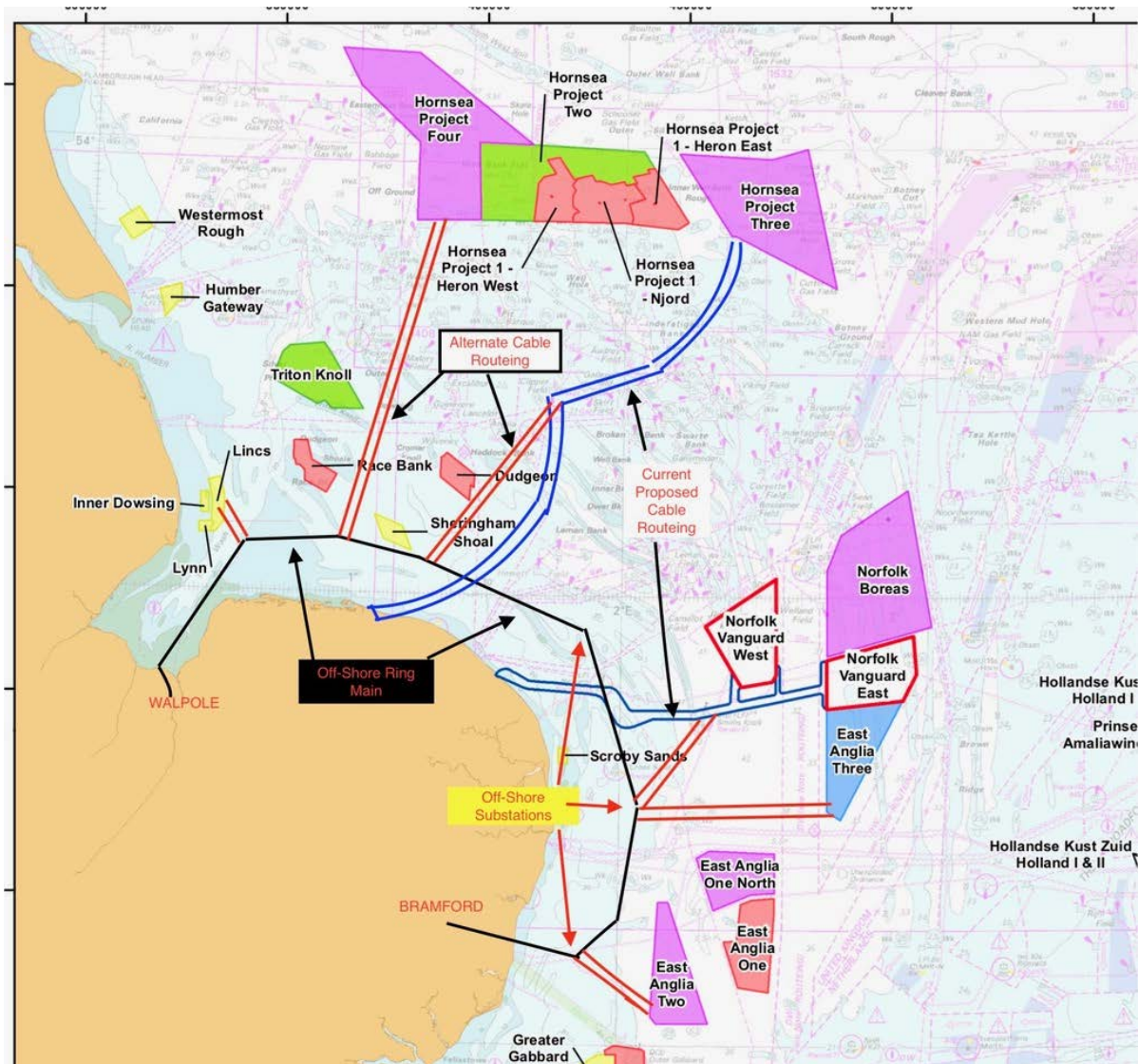
Friends of North Norfolk
CPRE, Norfolk

Sir Edward Evans-Lombe, Trustee, Lombe Estate Trust
Charles Watt, Trustee, CM Watt Residual Trust, Thickthorn Estate, Hethersett
Graham Mackintosh, Trustee, Mackintosh Trust, Thickthorn Estate, Hethersett
Martin Kemp, Thickthorn Farm, Norwich Road, Hethersett
Poul Hovesen, Salle Farms, Salle

OFFSHORE RING MAIN - Summary document

There are alternatives to how off-shore generated renewable energy can be brought on-shore, as has been provided in responses to both companies' PEIRs. A simple off-shore extension to the NETS, outside of any Marine Conservation Zone, with collecting substations on platforms similar to those proposed by both projects for their wind farms, could easily be designed and constructed. Off-shore wind farm developers could then pay a connection levy to access the Off-shore Ring Main (ORM) which would cover the cost of construction and may even generate a profit for the UK. Developers would save all the costs of design and construction for individual on-shore transmission systems making such a project very attractive. A graphic of the suggested ORM is attached.

Offshore Ring Main Graphic



Notes:

1. Not to scale.
2. Off-shore substations on platforms as per current plans for Vanguard.
3. Minimal on-shore impact with minor NETS extensions exemplified at Walpole and Bramford or other suitable coastal substation e.g. – Sizewell or Bradwell.
4. Positive impacts:
 - Minimal on-shore infrastructure impact on the environment
 - Shortened marine cable routes for developers
 - Upgrade to NETS infrastructure
 - No on-shore disruption
 - Pooled resource
 - Reduced overall costs for individual projects