

Your reference: EN020027
09 April 2026

**THE PROPOSED NORWICH TO TILBURY DEVELOPMENT CONSENT ORDER
PINS REFERENCE: EN020027**

**WRITTEN REPRESENTATION ON BEHALF OF SHERINGHAM SHOAL AND DUDGEON EXTENSIONS
PROJCO LIMITED**

Dear Sir/Madam,

1. Introduction

This written representation is submitted by Equinor New Energy Limited on behalf of Sheringham Shoal and Dudgeon Extensions ProjCo Limited (SSDEPL) in relation to National Grid Electricity Transmission plc's (NGET) application for a development consent order (DCO) for the Norwich to Tilbury Project (N-T Project). This representation is intended to provide an update on progress to the Examining Authority (ExA) further to its previous submissions RR-3368 and REP1-231 concerning the overlaps between the projects, and to respond to the ExA's written questions.

2. Progress update

SSDEPL's position remains as set out within RR-3369; however, by way of update, the parties have continued to engage and are hopeful that an agreement on this can be reached. The technical teams for SSDEPL and NGET met on 23 March to discuss the interactions in more detail.

SSDEPL has shared its draft protective provisions with NGET and has received high level comments in response, but substantive comments are awaited. NGET's solicitors have requested further discussions take place between the parties, which SSDEPL welcomes.

3. Response to ExA questions

The Examining Authority has invited SSDEPL to respond to question GEN 1.9. SSDEPL's response is set out in the following table.

NGET submission	SSDEPL clarification
<p>3.2.2 The projects are promoted by Equinor. Development consent was granted in April 2024.</p>	<p>As set out in full in REP1-231, the application was promoted by Equinor New Energy Limited on behalf of Sheringham Shoal and Dudgeon Extensions ProjCo Limited (SSDEPL) but SSDEPL is the undertaker for the purposes of the Sheringham Shoal and Dudgeon Extensions DCO.</p>
<p>There is an overlap with the Order Limits for the Project in the vicinity of Hall Green Cottages and Vale Farm.</p>	<p>There are multiple points of overlap/interaction between the Order Limits for the projects. These are described in full in the above written submissions and the Statement of Common Ground (REP1-081).</p>
<p>A crossing agreement is needed due to the Project's oversail of Equinor's cable corridors and haul roads. A SoCG is in preparation with an update due to the ExA for Deadline 1.</p>	<p>SSDEPL's solicitors noted the reference in REP1-134 to the need for a crossing agreement and raised a query on this with NGET, as SSDEPL had not requested such an agreement and this was the first mention of one being required. SSDEPL awaits a response on this. SSDEPL is engaging directly with NGET to ensure SSDEPL's concerns are addressed in suitable protective provisions to be included within the draft Development Consent Order.</p>
<p>Table 6.1 – DCO6 Mitigation and screening planting proposed along the boundaries of the parcels of land immediately surrounding the proposal's onshore substation site – located south of Norwich Main Substation. Planting will comprise enhanced hedgerow and proposed native tree, scrub and grassland planting with habitat creation. Interaction – The Project interacts with land earmarked for the proposal's 400 kV cable easement and does not interact with the proposal's mitigation and screening planting.</p>	<p>SSDEPL has identified interactions in relation to landscape and ecology mitigation beyond those listed in Table 6.1. There are, therefore, further interactions which will have significant impacts on SSDEPL's ability to fulfil its own landscape and ecological management obligations as secured through the requirements of the Sheringham Shoal and Dudgeon Extensions DCO.</p> <p>SSDEPL has, in considering Row DCO6 of Table 6.1 (REP1-134), noted further discrepancies and issues with documents submitted by the Applicant.</p> <p>SSDEPL has noted a discrepancy between the detail of the landscaping shown on the Outline Landscape and Ecological Management Plan Appendix D – Outline Landscape Proposals (APP-325) and the Trees and Hedgerows to be Removed and or Managed Plans - Section A (APP-048) (hereon the Trees and Hedgerow Removal Plan). SSDEPL seeks clarity from NGET on what is proposed to be planted and removed in the area immediately south of the Norwich Main Substation Extension. APP-048 indicates tree groups and hedgerows within this area are to be removed. APP-325 indicates this area as "Existing Vegetation to be managed under overhead lines" indicating it will be retained. Clarity is sought from NGET on this matter.</p> <p>Table 6.1 does not acknowledge that this proposed planting directly overlaps with areas where the Sheringham Shoal and Dudgeon Extensions DCO consents permanent works. These permanent works comprise the operational access to the SSDEPL onshore substation and landscaping, ecological and environmental works as well as drainage works, giving rise to a direct conflict. This concern relates to the area shown on APP-325 where there is new planting proposed on the eastern side and southeastern corner of the existing Norwich Main Substation. NGET has confirmed in REP1-081, within the Table at</p>

	<p>Paragraph 6, row 6.3 that “<i>National Grid can commit to planting environmental areas in such a manner that would not obstruct the SSDE permanent access road to its substation</i>”.</p> <p>It will also be important for SSDEPL to be able to freely access the landscape and mitigation planting undertaken in respect of the Sheringham Shoal and Dudgeon Extensions DCO in order to comply with its maintenance obligations within the requirements of that DCO. SSDEPL welcomes the commitments made in REP1-081 and looks forward to seeing in greater detail how NGET will deliver this commitment to ensure these direct conflicts can be resolved.</p>
--	--

4. Conclusion

SSDEPL continues to object to the proposed Norwich to Tilbury DCO until its concerns are resolved. In light of the positive steps taken to date, we believe that a resolution can be achieved.

Yours faithfully,

A solid black rectangular box used to redact the signature of the sender.

Equinor