

## The Norfolk Parish Movement for an Offshore Transmission Network (OTN)

### Update: February 2022

Dear Chairs, Councillors and Clerks,

The last two months have been a turbulent and difficult time.

However, to start on a positive note: since Christmas several more parishes have joined the group and the Norfolk Parish Movement for an OTN now has a truly impressive membership of 95 Parish and Town Councils.

We welcome all those who have recently joined.

So – what are we facing now?

### Calendar of recent events:

1. Vattenfall's Norfolk Boreas (NB): consented on 10th December 2021, is assumed to have entered the government's Contract for Difference (CfD) auction which opened on 13th December 2021.
2. Vattenfall's Norfolk Vanguard (NV): *re*-consented on 11<sup>th</sup> February 2022. See Decision Letter attached.
3. Orsted's Hornsea Three (H3): was consented way back in December 2020 and is now assumed to have entered the CfD (see Comments Section 6 below) in Dec. 2021.
4. Equinor's Sheringham and Dudgeon Extension Project (SEP/DEP): is now gearing up to enter the NSIP planning process Q2 (April – June) this year. Has announced dates of further Town Hall public information days. See update slides attached.
5. OTN Review: BEIS hosted a webinar update on the work of the OTNR on 31<sup>st</sup> January 2022. Link attached at point 5 below.
6. Contract for Difference (CfD) auction - closed on 14<sup>th</sup> January 2022. Details of the contracts awarded to particular developers are expected to be announced in July this year.

### Comments:

Norfolk is currently in the position of facing the onshore disruption from three enormous offshore wind farm projects, all now with development consent. It is important to note that **all three** of the panels of Planning Inspectors – appointed to conduct a 6-month public examination process in each case – **recommended refusal**. And in each case that recommendation was **overturned by the Secretary of State**.

As at today, however, no project yet has a contract to produce electricity, although results of the recent subsidy auction (CfD), relating to Hornsea Three and Norfolk Boreas, are expected to be published in July.

- 1. Norfolk Boreas:** was granted a development consent order (DCO) on 10th December 2021. This was hugely disappointing, as more than 90 Norfolk councils had been urging the Secretary of State (SoS) to defer this decision until after the Offshore Transmission Network Review reports on its work later this year. Many parties held discussions during the ensuing 6-week window for appeal, as to the viability of mounting a challenge at Judicial Review (JR). For several reasons, the deadline passed without this being possible. Vattenfall immediately re-doubled their PR charm offensive, offering all and sundry in Norfolk the unedifying prospect of competing with each other for grants from their “Community Fund” – awarded to projects that “*will be designed to help realise your communities’ development ideas, in a climate-smarter way.*” They will be holding ‘workshops’ to teach you how to “*work together to create stronger projects and be better prepared to pitch for community benefit funding from 2024.*” Good luck with that. Alternatively, feel free to consider responding to Vattenfall, demanding instead **the right to compensation** rather than a ticket to a funding lottery, and pointing out that 95 parishes have already come up with an excellent idea for developing their communities’ ability to live in a “climate-smarter way” - and it’s called **an Offshore Transmission Network**. We are obliged to point out the inconvenient truth that Vattenfall has spectacularly failed to take its own advice and “work together to create stronger projects” by **failing to work together with Orsted and Equinor** to encourage **all to opt in** to the design of the OTN.
- 2. Norfolk Vanguard:** The SoS has been re-considering this project since the JR last year, and **re-consented** it on 11<sup>th</sup> February 2022. Vattenfall will be likely to enter it into the next CfD, in pursuit of a contract, in March 2023. The SoS’s decision was of course a cruel blow. The quashing of the original consent by the High Court last February bought time for improved government planning – time which has been in many ways squandered, or that planning deliberately delayed. The final re-determination would appear to have been a largely cynical exercise. The SoS’s Decision Letter (attached below) is now more carefully crafted and thickly laced with lip service being paid to “serious consideration” of the adverse impacts on communities and the environment, before *once again brushing those impacts aside*, citing in the crudest terms the overriding need for renewable energy. Full stop. The letter is simply an attempt to provide more watertight protection against a legal challenge to the SoS’s decision.
- 3. Hornsea Three:** Orsted has suddenly submitted an application to South Norfolk Council (as the local planning authority) for a very large Battery Energy Storage System (BESS) to store some of the surplus energy from H3 and discharge it later into the grid. This presents a massive visual impact, but also *safety*, issue for those living around the Norwich Main substation site and local parishes rightly contend that this should have been part of the original DCO application by Orsted, as it is an undeniable cumulative impact of that project. Orsted also appears to be starting pre-construction works, submitting reserved matters to Local Planning Authorities (LPAs). These are unresolved remaining issues in the planning conditions. **We recommend that PCs proactively contact their LPA** and request liaison on these matters. Many of the final construction details that will most affect communities on

the ground will be decided **at this stage** and vigilance is absolutely essential. Orsted will also be awaiting the result of the CfD to see what they have been granted in the way of a contract and strike price.

- 4. SEP/DEP:** Equinor *has not yet submitted this project to the Nationally Significant Infrastructure Planning (NSIP) process*, but is about to do so. They are busy finalising the details of their application for a DCO, which they say will be submitted to the Planning Inspectorate (PINS) most probably in June of this year. Equinor has already met in recent weeks with several individual Parish Councils along the cable route. If you wish to engage them in a bespoke discussion, then request a meeting. Be aware however of the shocking track record of all these developers in saying what individual parishes might want to hear, and their predilection for divide and rule. And don't forget to bring the discussion round quickly to exactly what is preventing them from reacting responsibly to the OTN Review and requesting from National Grid *right now* a better point of connection to the grid. They could for instance use a marine export cable and make landfall to connect at the Walpole substation near King's Lynn. They have also recently announced an imminent programme of final public information days in 4 venues over one week: 07 March - 2pm to 7pm at Aylsham Town Hall NR11 6EL; 08 March – 1pm to 6pm at Hall for All, Weston Longville NR9 5JP; 09 March – 1pm to 6pm at Swardeston Village Hall NR14 8DL; 10 March - 11am to 4pm at Sheringham Museum, Lifeboat Plain NR26 8BG. **Please attend if you can, and question the developer rigorously.**
- 5. The Offshore Transmission Network Review:** the latest OTNR update was hosted by the Dept. for BEIS by webinar on 31<sup>st</sup> January 2022. The slides can be viewed on the government's website at this [Link](#) (scroll down to 'Events'). We already had to absorb before Christmas the disheartening news that the long-awaited publication of the Holistic Network Design (of the OTN) was to be delayed from January until May this year – but we now learned of further slippage until June. This sort of delay is not helpful to our cause. Emily Bourne, Director, then said that as a result of a meeting in Suffolk with Therese Coffey MP, campaign group SEAS and others: *"it was clear ... that the meaningful change this Review needs to deliver ahead of 2030 through its Pathfinder Projects must not just look at where infrastructure can be coordinated and shared connections taken forward but also seek to ensure that any shared connections that do come forward do so in **the most appropriate place.**"* She then proceeded to announce the setting up of an East Anglian Coordination Programme to explore more ambitious coordination and changes in East Anglia. This sounded encouraging, but subsequently – and predictably? – the first meeting of this 'programme' went ahead on 14<sup>th</sup> February with only BEIS, Ofgem and RenewableUK in attendance, and without a single representative of any community or environmental group present. I wrote to Jerome Mayhew MP, in his capacity as Vice-Chair of the OffSET group of MPs established to scrutinise the work of the OTNR, to ask for his impression of the January OTNR webinar. He replied in the following terms: *"...I am not sure that we have learned a great deal more than we already knew as a result of it. I think that the focus of attention should be to increase the political pressure to accelerate the timescales associated with the OTNR. It feels as*

*though the system is relaxing into a comfort zone of process rather than outcomes.”*  
Sadly, many attendees had formed a very similar impression.

- 6. The Contract for Difference (CfD) auction** opened on 13<sup>th</sup> Dec. 2021. This is the mechanism by which the government allocates contracts to renewable energy developers, including financial support (subsidy) generated from the ‘green tax’ that is included in all consumers’ electricity bills. Eligible projects, which have *already received planning consent*, submit sealed bids and are competing against each other for contracts. It is believed that, in the case of Norfolk, only Hornsea Three and Norfolk Boreas will have been eligible to apply. The closing date for the CfD was 14<sup>th</sup> January 2022 and the decisions will probably be announced in July 2022. It is only the allocation of such a contract that triggers enough certainty for the developers to finally make a Financial Investment Decision and proceed to initiate the construction phase of their projects.

### Summary

Let us be clear and realistic – *as things currently stand*, we appear to have won the argument (an OTN will indeed be designed and implemented in the near future) but the future of Norfolk still hangs in the balance.

The environment and communities of Norfolk are being sacrificed for the sake of an arbitrary, sound bite target of “40 gigawatts by 2030”.

BUT the permanent isolation of these first three big wind farms from the OTN, by point-to-point grid connections, is **irresponsibly inefficient** and only serves the interests of a government seeking popular support, and of the developers seeking a fractionally speedier access to profits, at the consumers’ permanent expense. More haste, less speed.

How to manage most efficiently this unprecedented energy transition from fossil fuels to renewables is a highly complex, engineering-based process requiring from politicians the time and effort to understand it. Tragically, the response so far has been ill-informed and superficial.

The intention of the crude target of ‘40 by 30’ has been simply to cover over the tracks of National Grid plc’s inertia and the government’s short-termism over the past 10 years, and transform them instead into a glamorous and progressive-sounding goal.

Meanwhile, the planet heats.

We should not forget that the emergence of the Norfolk Parish Movement over the past three years has undeniably put enormous pressure on the situation. Our existence and sustained activity have raised the profile of the onshore impacts both regionally and at Westminster, galvanised our MPs, affected the developers’ plans in many ways, and hastened the creation of the OTN Review by BEIS.

In supporting a successful Judicial Review on Vanguard, we had hoped to improve decision-making at government level and buy the time for that to take place. Sadly, it appears that for the moment at least this has mainly achieved a sharpening of pencils in the legal

department at BEIS. Instead of improving the substance of their decisions, BEIS have merely tried to ensure that their continuing bad decisions will be more difficult to challenge on a point of law in the High Court.

This is a terrible example of poor leadership in the face of an urgent crisis.

As a very large group of Parish and Town Councils, we must now ride two horses. **We must support those parishes who will be most grossly affected**, as they continue their work of damage limitation if these three early projects go ahead as consented – but we must also continue to let our democratic representatives at every level know *just how strongly we feel* that the current situation is unacceptable. **We should do this both collectively and individually, writing to our District and County Councillors and also to our MPs. We should also write strong letters to our District Council *Planning Departments*, requesting active liaison with the parishes and information as to how they are going to represent your interests as they handle the reserved matters (planning conditions) for all three projects, which will now be presented to them as the Local Planning Authority. Similar letters should go to Norfolk County Council Highways, requesting information on how they are going to deal with the transport and traffic issues.**

If your PC does write such letters, it would be extremely helpful if you could let me know.

Until the way forward becomes clearer, we must remain steady in our resolve, and ready to seize any opportunity to increase political pressure on the situation, to bring forward much faster the design and implementation of a *fully efficient* OTN.

Our heads are bloody, but unbowed.

Onwards!

With best wishes,

Alison (Shaw)

Oulton parish councillor  
pp The Norfolk Parish Movement for an OTN

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