



Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects

Offshore Temporary Boundary Change Targeted Consultation Responses

August 2022
Document Reference: 5.2.24
APFP Regulation: 5(2)(q)

| | |
|--|---------------------------------------|
| Title: Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects Consultation Report Appendix 24 - Offshore Temporary Boundary Change Targeted Consultation Responses | |
| PINS document no.: 5.2.24. | |
| Document no.: C282-CC-Z-GA-00026 | |
| Date: August 2022 | Classification Final |
| Prepared by: Counter Context | |
| Approved by: Jan Trønningdal, Equinor | Date: August 2022 |

Table of Contents

| | | |
|---|---------------------------|---|
| 1 | Section 42 Responses..... | 3 |
|---|---------------------------|---|

1 Section 42 Responses

| Stakeholder | Comment | Development Change? | Response |
|------------------|--|---------------------|---|
| Historic England | We therefore concur with the matters summarised for inclusion with any Outline WSI such as avoidance through Archaeological Exclusion Zones; geophysics and geoarchaeology assessment methodology; and application of a reporting protocol for discoveries will be inclusive of the proposed additional temporary works area buffer zone. We also welcome the commitment made in paragraph 23 that the Archaeology Expert Topic Group (ETG) will be consulted on the revised Outline WSI as part of the ongoing Evidence Plan Process. | N | The Outline WSI (Offshore) (document reference: 9.11) includes consideration of the offshore temporary works area following the amendment to the proposed Order Limits. A draft of the Outline WSI (Offshore) has been forwarded to Historic England for review prior to submission |
| Historic England | Further to the acknowledgment of further geoarchaeological assessment as a component of any Outline WSI, we consider it relevant that any further discussion directed through the ETG allows for consideration of palaeo-channel features to be encountered. We are aware that utilising geophysical and geotechnical survey should be extended to include the additional temporary works area buffer zone and thereby build of the assessment provided in PEIR Appendix 16.1 (Archaeological Assessment of Geophysical Data), such an approach would give an indication of the potential for prehistoric landscape and channel features to be impacted in the extended area. | N | |
| Eastern IFCA | We consider that enlarging the works area by 750m either side of the cable corridor is likely to result in more extensive fisheries exclusion areas during cable works (survey, pre-lay clearance, laying operations and post-lay works). This could result in significant displacement for inshore fishers – particularly those using the small vessels typical of the Cromer/Sheringham area, whose working range is very limited. We request that this matter is considered further. We also strongly recommend that local fishing industry representatives are engaged with from an early stage, well in advance of any required exclusions, and that meaningful engagement is maintained throughout the project lifespan. | N | To further clarify this statement, the temporary works and associated impacts of exclusion, displacement and disruption etc., have been assessed within ES Chapter 14 Commercial Fisheries (document reference 6.1.14). The total surface area, duration and other maximum design scenarios for these works remain consistent, the 750m extension means that these (already assessed) activities have the opportunity to occur in a wider area, while the measure of the impact activities themselves do not change. The fishing fleets and nature of fishing activities within these wider areas are considered to be consistent with the project areas already |

| | | | |
|-----------------|--|---|---|
| | | | assessed (e.g., no new fisheries to those already assessed have been identified specifically within the 750m extended temporary works area). As a result, the original assessment, which considers exclusion areas and displacement of inshore vessels for the range of commercial fishing fleets operating across the project, remains valid. |
| Eastern IFCA | If the footprint of works is likely to increase as a result of extending the works area, we consider this should be carefully assessed in relation to the location of sensitive MCZ habitats (including subtidal chalk underlying sediment veneers). We highlight that Eastern IFCA has agreed fisheries restriction areas for towed, demersal fishing gear, (e.g. dredges and trawls) across most of the Cromer Shoal Chalk Beds MCZ to prevent physical damage to surface chalk as well as that underlying sediment, on the basis (and following Natural England's advice) that sediment could be mobile and expose the chalk. These restrictions will be implemented when Eastern IFCA's Closed Areas Byelaw 2021 is signed off by Defra (likely within 6-12 months). Stakeholders are likely to raise concerns if protected areas closed to certain fishing activities, for conservation purposes, are subsequently affected by wind farm cabling works. | N | The cumulative effect of fisheries management restrictions within protected areas has been assessed within ES Chapter 12 Commercial Fisheries (document reference 6.1.12). The cumulative effect of the MPAs is unmitigable by the Applicant. Even if the cumulative contribution from SEP and DEP to this impact is de minimis the assessment of significance would remain the same as a result of the inclusion of the MPAs. |
| MMO | Marine plans will inform and guide decision makers on development in marine and coastal areas. Proposals should conform with all relevant policies, taking account of economic, environmental and social considerations. Marine plans are a statutory consideration for public authorities with decision making functions. | N | Noted. The Applicant has ensured that the proposal for the Projects has conformed with all relevant policies. Economic, environmental and social issues have all been considered as part of the development of the proposals. |
| MMO | If this consultation request relates to a project capable of falling within either set of EIA regulations, then it is advised that the applicant submit a request directly to the MMO to ensure any requirements under the MWR are considered adequately at the following link | N | The Applicant has engaged with the MMO to ensure that the EIA regulations for the projects have been abided by. |
| Natural England | Para 5 Micro-siting Sensitive Features. Natural England welcomes that the additional temporary works buffer will enable the ability to microsite the offshore cables and wind turbines. As stated, this is particularly useful to avoid sensitive features within the Cromer Shoal Chalk Beds Marine Conservation Zone (MCZ). However, Natural England advises this is also applicable to other protected habitats and species | N | Noted. |

| | | | |
|-----------------------------------|---|---|--|
| | identified from surveys outside the MCZ including Annex 1 Sabellaria spinulosareef habitat, also listed under Section 41 of the NERC, 2006 Act along with Peat and Clay Exposures with Piddocks. | | |
| Natural England | Para 6 Temporary Works. Natural England further welcomes the commitment that no anchoring or use of jack-up vessels will be undertaken in the nearshore area of the Cromer MCZ where the outcropping chalk feature was identified by the pre-construction survey. We advise further consideration is given within this paragraph, making it clear that within the zone adjacent to the outcropping reef careful consideration is given to the direction that the vessel is situated and thus where anchors may be placed on the seabed to ensure that any harm to the chalk feature is avoided. | N | Noted. |
| Natural England | Table 1.3.1 Seabed survey gaps. Natural England agrees that survey coverage will be required of the complete order limits to fill the gap of the additional temporary works area at the pre-construction stage to inform project design, micrositing and verify impact assessment. This must be secured within the DML in the Draft DCO. | N | Noted. |
| Natural England | Natural England agrees that as the density estimates for the existing windfarm footprint already includes a 2km buffer which will encompass the extended 200m temporary area, recalculation of the density estimates around the windfarm array as presented in the PEIR is not required. | N | Noted. |
| Natural England | Para 15 Red-throated diver. Natural England agrees that re-estimation of the number of red-throated divers potentially impacted by the temporary works will be required. We welcome the inclusion of this in the Environmental Statement and Habitats Regulations Assessment within the DCO application. | N | Noted. |
| North Norfolk Fishermen's Society | Please be aware that there is a lot of fishing gear within the proposed survey areas | N | Noted. The Applicant has committed to engaging with the fishing industry regarding fishing gear. |
| North Norfolk Fishermen's Society | Please also be aware that fishing activity will be taking place (heavily) during the months of the survey, within the survey areas | N | Noted. The Applicant has committed to engaging with the fishing industry regarding fishing activity. |