

**From:** [REDACTED]  
**To:** [SAJEF](#)  
**Subject:** FW: EN010109 - South Norfolk Council's Relevant Representation and Broadland District Council's Relevant Representation  
**Date:** 14 November 2022 19:38:40  
**Attachments:** [image001.png](#)  
[SNC Relevant representation.docx](#)  
[BDC relevant representation.doc](#)

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Dear Sir/Madam

**Planning Act 2008**

**Application by Application by Equinor for an Order Granting Development Consent for the Sheringham and Dudgeon Extension Projects**

Please find attached the Relevant Representations for South Norfolk Council and for Broadland District Council.

Although we have one officer team serving both Council's and I am the lead officer for the DCO's for both Districts, each Council remain independent of each other, hence I am submitting a separate relevant representations for each of them.

Kind regards

Claire

**Claire Curtis**

Area Team Manager

[REDACTED]



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South Norfolk Council  
Thorpe Lodge  
1 Yarmouth Road  
Thorpe St Andrew  
Norwich  
NR7 0DU



Your ref EN010109

Date 14/11/2022

Dear Sir/Madam,

**South Norfolk Council – Response to S56 Consultation Sheringham Shoal Offshore Wind Farm Extension Project and Dudgeon Offshore Wind Farm Extension Project**

**Proposal: National Infrastructure Application for an Order Granting Development Consent to construct and operate two offshore wind farm generating stations, known as Sheringham Shoal Offshore Wind Farm Extension Project (SEP) and Dudgeon Offshore Wind Farm Extension Project (DEP), both located off the coast of Norfolk (together “the Projects”).**

This letter sets out South Norfolk Council’s Relevant Representation in respect of the above application.

The Application is for development consent to construct and operate two offshore wind farm generating stations, known as Sheringham Shoal Offshore Wind Farm Extension Project (SEP) and Dudgeon Offshore Wind Farm Extension Project (DEP), both located off the coast of Norfolk (together “the Projects”). SEP is the proposed extension to the operational Sheringham Shoal Offshore Wind Farm and will comprise up to 23 wind turbine generators, together with the associated onshore and offshore infrastructure. The offshore export cable corridor from SEP to landfall will be approximately 40km in length and the onshore cable corridor will be approximately 60km in length. DEP is the proposed extension to the operational Dudgeon Offshore Wind Farm and will comprise up to 30 wind turbine generators, together with the associated onshore and offshore infrastructure. The offshore export cable corridor from DEP to landfall will be approximately 62km in length and the onshore cable corridor will be approximately 60km in length.

In general, the District Council is supportive of the project, recognising its importance in relation to the diversification of UK energy supplies; the contribution the projects will make to the achievement of the national renewable energy targets toward net zero; the reduction of the UK’s reliance on imported energy and increased energy supply security; and potential contribution to the national and local economy. The economic benefits in terms of investment

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and job creation are welcomed. We are however concerned at the adverse visual effects the onshore substation would have on our District. Equally, the combined impacts of Hornsea Project Three substation and their proposed Energy Balancing Infrastructure; consent and proposed battery storage proposals which are located around Norwich Main, together with this proposed substation, will have on the District's rural landscape.

The Environmental Impact Assessment has been conducted using appropriate and agreed methods and has been informed by relevant and up to date surveys, modelling, evidence gathering and desk studies. The scope and methodology of these has been agreed with key stakeholders and consultees throughout the process. Overall, the ES is comprehensive and of good quality and there are no substantive issues arising from it, subject to the following comments:

#### *Impact on Heritage Assets*

The Council note that para 107 *"The assets identified above were found to either not share intervisibility or had limited intervisibility with the onshore substation and associated infrastructure and the offshore infrastructure. This was considered to have little to limited change on their setting, and due to their distance from the above ground onshore and offshore project infrastructure, no significant impacts to heritage setting (and associated importance) were identified and no further action is considered to be required. This is further evidenced in Section 21.6 and Appendix 21.4 and 21.5."*

Paragraph 30 has screened out the setting of various assets having taken into account the LVIA wireframed on potential impact on setting.

Three assets remain: Church of St Peter, Church of Holy Cross and Church of St Mary Magdalen. With regard to these assets, St Peter's Church in Swainsthorpe due to the height of the tower there is some intervisibility however with the distance involved, nature of proposed construction and the ability to appreciate the significance of the asset from many other viewpoints means that the impact on the setting of the assets is negligible or non-significant and therefore has been discounted in ES terms. In regard to the Church of the Holy Cross due to topography there may some intervisibility from the top of the tower, however with the distance involved and there being no intervisibility at a lower level due to topography, there will be no significant impact on the setting. Lastly is the impact on the setting of The Church of St Mary Magdalen in Swardeston. Again, it is only possible intervisibility with the top of the church tower, but with the distance separation and the ability to appreciate the significance from many other viewpoints, there is considered to be no impact on the setting of the church. The Council agrees with the above assessment of the designated heritage assets.

The Council consider that further clarification needs to be undertaken regarding the impact on the project on Ketteringham Hall Park which is a historic parkland and garden although not registered which is identified on Historic Environment record and can be considered a non-designated heritage asset.

#### *Landscape and visual impact*

The ES includes a Landscape and Visual Impact Assessment and this is fit for purpose; the viewpoints used within this are as agreed with the Council. It is considered that in landscape impact terms, the greatest effect is on the site of the proposed substation and this would be a moderate significance adverse but that this would diminish outside the site where the effects would not be significant. With regards to the visual impact, the most significant visual effects (major adverse) are from PRow's, permissive bridleway and Gowthorpe Lane. *The LVIA is based on a 'mitigation by design' approach, which means that landscape considerations have been accounted for as an integral part of the design process and therefore, appropriate landscape mitigation measures required to reduce the effect of the*

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*Proposed Development on landscape character and views have been incorporated into the design of the project and the assessment of effects, and it is assumed that this mitigation forms part of the final design.* It is noted that additional planting to further screen the substation is proposed however, the planting will take a long time to establish. It is also considered that some of the degree of harm can be mitigated against through use of recessive colour for the building/s.

In respect of the impact of the cable route, The Arboricultural Survey Report survey identifies the trees and constraints within parts of the DCO boundary, but not all. The Council considers that the tree/hedge details for the whole corridor should be provided, this should also include veteran trees which maybe outside the corridor but could still be implicated. Currently there is not an assessment in line with the 1997 Hedgerow Regulations, in the absence of the information in terms of the 'importance' of hedgerows under the Hedgerows Regulations and assessment of trees implicated in the scheme, it is not possible to conclude on the impacts of the cable route.

It is also noted as above that the cable route is passing through Ketteringham Hall Park and through some planted plantation belt historic feature "The Oval" so could potentially involve removal of some C19th trees, which if this were the case would have a harm on the Landscape character of the designed parkland.

#### *Noise and Pollution*

With regards to specified works to be undertaken issues relating to Control of Noise, Air Quality, Artificial Light, Waste Management, Pollution Prevention, Contamination Assessment and Mitigation and Working Hours are adequately covered by the Requirements in the Draft DCO. The Council is in general agreement but wishes to confirm that issues relating to hours of operation, siting of any standby generators, good practise procedures, prior notification of constructional noise, floodlighting, movement and storage of waste materials, public safety, dust control, emissions, telecommunication or television interference and decommissioning should be in place in the final documents.

#### *Ecology*

The Council considers that all developments should take all reasonable opportunities to enhance biodiversity to achieve a net gain for nature. To achieve this the application should adhere to the mitigation hierarchy (providing effective avoidance, minimisation and compensate measures) and deliver biodiversity net gains.

The scope for terrestrial ecological surveys has been previously agreed and surveys of 90% of the route were undertaken between 2020-2021 by suitably qualified and experienced ecologist in line with best practice guidelines. The Council would also encourage the applicant to update the desk top study as our County Wildlife Sites were recently updated.

The cable route has been designed to avoid impacts where possible and further micro-siting is expected at the detailed design. The Council would encourage the applicant to explore further opportunities to avoid/minimise impacts in partnership with other schemes in the area as the schemes develop and are delivered.

The ES provides an outline for mitigation and the Council welcome the use of native species of local provenance and biodegradable tree guards. The proposed mitigation will be reviewed and adjusted as the design progresses. Consideration should be given to the use of moveable 'hedges' which could be placed within hedge gaps at night and removed the following day, to provide for continued connectivity. These have been proposed and will also be trailed by another linear scheme.

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Should reptile translocation be required, the translocation site will need to be identified, secured, and maintained for at least the lifetime of the scheme.

The applicant is committed to deliver biodiversity net gain (BNG) and an Initial Biodiversity Net Gain Assessment<sup>1</sup> has been undertaken. At the present time it is anticipated that the scheme will deliver a 0.50% net loss in habitats, and a 3.02% net gain in hedge units. Because it is not possible to offset the loss of habitat units against the gain in hedge units additional work will be required to deliver net habitat gains to ensure the scheme complies with National Planning Policy. With regards to the delivery of BNG we would encourage consideration of the Local Nature Recovery Strategy which should be published by November 2023, and compliance with best practice guidelines to ensure that BNG is delivered post-construction.

Letters of No Impediment (LoNI) have been received from Natural England for bats and badgers and great crested newts will be licenced under the District Level Licensing Scheme. No other licences are anticipated to be required based on the information obtained to date although additional ecological surveys will be undertaken on the remaining 10% of the route to inform the detailed design. In line with best practice Reasonable Avoidance Measures should be employed to minimise impacts on great crested newts and we would encourage the design of a wildlife friendly surface water drainage scheme, with Sustainable Urbans Drainage Systems designed for the benefit of wildlife.

Overall, following mitigation which will be secured via the DCO, the scheme is predicted to have negligible or minor adverse impacts on ecological receptors i.e. the impacts would have minimal effect at the lower end of the scale, but could adversely affect an ecological receptor but would not adversely affect the integrity or conservation status at the other end. The ES has addressed inter-relationships between ecology, water and air, noise, and vibration.

#### *Conclusion*

The Council acknowledge that there are national benefits in delivering the projects, however there are limited benefits at the local level. There is however harm identified at a local level, in particular by the construction of the proposed substation. The Council considers that significant weight should be had to the visual harms in the planning balance.

The Council wishes to continue to work pro-actively with the applicants as the application is progressed through to Examination to try to resolve some of the outstanding issues, particularly in relation to hedgerows and trees, and the specific wording of some of the requirements.

Yours faithfully,

Claire Curtis

**Claire Curtis Bsc(Hons) Dip TP, MRTPI  
Area Team Manager**

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