



Your ref: EN010109-000711-SADEP - ExA  
Our ref: Sheringham and Dudgeon Extension Projects  
SADEP

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via email: [sadep@planninginspectorate.gov.uk](mailto:sadep@planninginspectorate.gov.uk)

Dear Menaka,

**Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Project  
(EN010109): Written Statement**

I refer to your letter dated 27 January 2023 regarding the above proposal and your invitation to submit written representations to the Examining Authority's (ExA) Written Questions as set out in the Rule 6 letter, Annex C [PD-006].

National Highway's responses are set out below and should be read in conjunction with the Statement of Common Ground between National Highways and Equinor New Energy Limited (the Applicant) which has been submitted to you by the applicant.

Please contact me [PlanningEE@nationalhighways.co.uk](mailto:PlanningEE@nationalhighways.co.uk) if you require any further information.

Yours sincerely,

S. H.

Dr Shamsul Hoque  
Assistant Spatial Planner



# **Sheringham Shoal Offshore Wind Farm Extension Project and Dudgeon Offshore Wind Farm Extension Project (EN010109)**

## **Written Statement by National Highways**

**20 February 2023**

### 1.0 Introduction

National Highways (NH) have been invited (dated 27 January 2023) to provide written representations to the ExA's Written Questions for this project. The relevant questions to National Highways and our responses are set out below.

<b>Q1.11.7 Interaction of the dDCO with Other Legislated DCOs, Other Existing Infrastructure and Planned Projects</b>
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**WQ1.11.7.1. Hillside Parks Ltd v Snowdonia National Park Authority (the Hillside Judgement)**

The ExA acknowledge the above judgement relates to a non-Development Consent Order case. However, it occurs to the ExA that the principles of the judgement may be applicable for the Proposed Development given the level of interaction of the scheme with other existing consented DCOs, including land subject of compulsory acquisition.

The ability to modify the initial permission in the DCO context is based on the specific power in section 120 of the Planning Act 2008. In this respect:

- a) would any existing consented DCO need to be modified or amended by the Proposed Development?
- b) would any existing consented DCO be prejudiced in the ability to be implemented, either through works or land take, to the extent it could not come forward in accordance with its terms and management plans?
- c) provide any other views on the relevance, or otherwise, of the judgement upon this project.

**Response:** The A47 North Tuddenham to Easton and A11/A47 Thickthorn RIS schemes were granted DCOs in 2022 and it is agreed that interactions between these consented schemes and the Proposed Development should be considered in full.

The project teams within National Highways have been contacted internally in order to fully assess all potential interactions and we expect to provide a further update at Deadline 3.

**Q1.23. Traffic and Transport**

**Q1.23.1 Effects from Construction Vehicles on the Highway Network and Living Conditions**

**WQ1.23.1.3. Methodology – Trip Generation and Construction Traffic Assignment**

Are the Highway Authorities content with the methodology and forecasts for trip generation and construction traffic assignment?

Response: Although National Highways is accepting of the general methodology used to inform the traffic and transport impacts of the proposals on the Strategic Road Network, on review of the Environmental Statement Traffic and Transport Chapter (ESTTC) and Transport Assessment (TA), matters have been identified that require further clarification before National Highways can be content with the forecasts. National Highways intend to engage with the applicant's consultant to reach an agreed position before Deadline 3.

**Q1.23.3 Cumulative Traffic Effects with Other Local Projects**

**WQ1.23.3.3. Cumulative Effects Methodology – Highway Schemes**

It is noted in the cumulative effects methodology [APP-110, Paragraphs 148-150] that the identified highway improvement schemes are all currently scheduled to be complete by 2025 and as such there may be no overlap with the construction phase of SEP and DEP. Is this still anticipated to be the case for all highway schemes?

Response: The National Highways Road Improvement Scheme (RIS) team has provided an update on the programme for the A47 North Tuddenham to Easton, A47/A11 Thickthorn Junction and A47 Blofield to North Burlingham schemes. These schemes are waiting for a Judicial Review decision which is being heard on 11<sup>th</sup> May 2023 and due to be communicated 1<sup>st</sup> June 2023.

The working assumption is that mobilisation on site in the form of early mitigation and enabling works may take place in the summer of 2023, and main works to commence in late 2023 or early 2024. The construction period would conclude in 2026. These are however high-

level planning assumptions and any variation from the Judicial Review timescale would further impact these timescales.

It is therefore evident that the improvement scheme will not be operational at the time of the SEP and DEP construction and that concurrent construction is the likely scenario. An update will be provided at the first available deadline following receipt of further information with regards to this.

Updates have been requested internally from the National Highways associated project teams and an update shall be provided ahead of Deadline 3.

### **Q1.23.5 Suitability of Access Strategy**

#### **WQ1.23.5.1. Abnormal Indivisible Loads**

NH (responsible for the A47) have not been able to structurally confirm the route for abnormal indivisible loads [APP-270] as there are two structures of concern (Scarning Bridge and a culvert located between Kings Lynn and Swaffham). It is set out that NH is still reviewing these structures to establish if the route can be cleared. What is the up-to-date position on this?

Response: Discussions are taking place between the Applicant's transport consultant and relevant National Highways teams. It is expected that an update will be provided by Deadline 3.

### **Q1.23.6 Effectiveness of Proposed Mitigation Measures**

#### **WQ1.23.6.1. Mitigation – A47**

The TA [APP-268] identifies significant impacts on two junctions of the A47 that fall within the study area. Both of these junctions are proposed to be removed by highway improvement schemes.

- a) What is the latest position on these improvement projects (A47 North Tuddenham to Easton Development Consent Order and A47-A11 Thickthorn Junction Development Consent Order) and are they still forecast to be completed before the construction of the Proposed Development starts?
- b) Should they not be delivered are the mitigation measures set out in the OCTMP sufficient as a 'fallback' to ensure there are not any significant impacts on the road network?
- c) If the improvement works under either of the DCOs were to be delayed and occur concurrently with the onshore construction programme of this project, would the OCTMP for the Proposed Development, taken

together with other OCTMP, provide adequate 'fallback' mitigation for the cumulative effects of both projects on the road network?

- d) Further to b) and c) above, what confidence can the ExA have that adequate mitigation measures are available and achievable in these scenarios?

Response: With regard to mitigation on the A47, specifically in relation to the two junctions currently forecast to experience significant impact, we respond as follows:

- a) As identified in response to Written Question 1.23.3.3, the A47 North Tuddenham to Easton DCO is unlikely to be completed before construction of the Proposed Development, and the position on the A47-A11 Thickthorn junction is to be confirmed.
- b) It is currently not possible to confirm whether the mitigation measures set out within the OCTMP as a fallback will be sufficient in addressing significant impacts on the SRN. Given that two of the SRN junctions are modelled as overcapacity in both construction scenarios, NH would expect that the mitigating effect of the OCTMP should be quantified.
- c) As set out in response to Question b), it cannot be confirmed that both sets of OCTMP will sufficiently mitigate effects, until the effect of the Proposed Development is quantified in a context in which the measures proposed in the OCTMP are fully realised.
- d) Although the potential impacts are yet to be agreed and quantified, it is anticipated that further discussions will take place between the SEP & DEP project team and A47 North Tuddenham to Easton and A47-A11 Thickthorn Junction project teams in order to provide confidence to the ExA that mitigation is available and achievable.