



Norfolk County Council

Sheringham Shoal & Dudgeon Extension Projects

Norfolk County Council's response to the Examining Authority's (ExA) Second Written Questions (WQ2)

Scheme Identification Number: *EN010109*

Registration Identification Number: 20033126

April 2023

Responses have been provided by:

John Shaw	Developer Services Manager, Highways
Sarah Luff	Strategic Flood Risk Planning Officer, Lead Local Flood Authority (LLFA)
Stephen Faulkner	Principal Planner, National Infrastructure Planning
Keith Mawson	Advanced Public Health Officer
Roberta Willner	Business Development Manager, Economic Development

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Q2.1.4		Miscellaneous
Q2.1.4.1	Applicant Local Planning Authorities	<p>Availability of Resources for NSIP casework</p> <p>In relation to responses from LPAs, would the Applicant be willing to commit to entering into Planning Performance Agreements in order to provide the relevant LPAs with the resource needed to ensure smooth and timely handling of requirement discharge processes should consent be granted? Explain with reasons.</p>
	NCC Response:	<p>Norfolk County Council (NCC) would expect Equinor to enter into a Planning Performance Agreement (PPA) which would provide the necessary certainty around cost recovery for the Council. NCC has entered into similar PPAs with other offshore wind energy developers post DCO, which has enabled staff resources to be allocated, either directly (where we are discharging authority) or indirectly (where we are a consultee), towards the discharge of the respective Planning Requirements.</p> <p>Norfolk is currently hosting over 11 live NSIPs at various stages in the planning process. All stages can be very resource hungry in terms of officer time needed to assess the large volume of supporting material produced by the applicant (e.g. Preliminary Environmental Information Report (PEIR); Environmental Impact Assessment (EIA); Development Consent Order (DCO) and any supporting information associated with the discharge of a Planning Requirement.</p> <p>The County Council is developing a dedicated NSIP team to deal with all aspects of this workstream; and has been successful in securing Innovations and Capacity funding from the Department of Levelling Up, Housing and Communities (DLUHC) towards delivering a more efficient / effective response to NSIPs in Norfolk i.e. developing a workflow management system. This has involved working with NSIP promoters/developers allowing them to access and share information on a County Council SharePoint platform.</p> <p>As such any PPA will need to be negotiated to provide appropriate funding towards officer-time to cover off not just the discharge of any requirements, but also any other work such as: (a) potential to deal with Non-</p>

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		Material Change proposals; (b) attendance at any Planning Support Group / regular meetings with the developers on the progress of the scheme/project; and (c) the dissemination of any updates from the developer to local council members etc.
Q2.6.4 Effects of construction works on human health		
Q2.6.4.6	Norfolk County Council	<p>Mental Health Mitigation</p> <p>By way of background NCC [RR-064] has set out that it would like the Applicant to include further mitigation measures to address any adverse effects on mental health, especially given the potential length of construction works, and adverse effects with regard to EMF. The Applicant has responded [REP1-036, Q1.6.4.8] that there are provisions to ensure community liaison that will contribute to reducing stress and anxiety associated with the construction programme, these include:</p> <ul style="list-style-type: none"> • Liaison with NCC about proposed construction works on Public Rights of Way; and • Community liaison, including the appointment of a liaison officer and setting out procedures for addressing community complaints through the OCoCP and the PEMP. <p>Does NCC agree with this and if not, what specific extra mitigation is being sought?</p>
	NCC Response:	NCC Public Health notes that the applicant has undertaken to implement a complaints procedure for members of the public and appoint a dedicated Community Liaison Officer. There is a consultation and communications strategy in place and the applicant has published an independent report into the effects of EMF. There are substantial Dust Management Plans, Construction Noise Management Plans and plans for maintaining access to public rights of way in the schedule of mitigation. NCC Public health concludes that no extra mitigation is required. The developer Equinor and Public Health have agreed to meet to further discuss the community liaison aspects of the project outside of the NSIP process.

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Q2.6.4.7	Norfolk County Council	<p>Assessment Scope</p> <p>Does NCC agree with the Applicant’s response [REP1-036, Q1.6.4.5 and Q1.6.4.6] that the inclusion of the additional vulnerable population groups and health outcomes sought by NCC would not change the overall findings of the ES [APP-114] with regards to air quality?</p>
	NCC Response:	<p>NCC Public health commented on the omission of certain vulnerable population groups and health outcomes in order to demonstrate that the impact on all vulnerable receptors had been duly considered. However NCC Public Health concurs with the applicant that the inclusion of said groups and outcomes would not materially change the overall findings of the ES [APP-114]</p>
<p>Q2.11. Draft Development Consent Order</p>		
<p>Q2.11.1 General</p>		
Q2.11.2.2	<p>Applicant Local Planning Authorities</p> <p>National Highways</p>	<p>Pre-commencement works</p> <p>Following the discussion at ISH3 [EV-035, EV-040], Applicant to provide a joint position statement with LPAs to cover the following:</p> <ul style="list-style-type: none"> a) how each of the activities that are excluded from the definition of commencement in dDCO are controlled, and parties’ position whether or not control is required through the dDCO; b) whether there is the need for a definition for pre-commencement in the dDCO and provide wording for such a definition; c) including NCC as a consultee in R19; and d) other related changes to the wording of R19. e) NH and Applicant, confirm if the draft PPs for NH leaves a shortfall in terms of the protection required by NH, which would be covered by the outline CoCP. f) Does NH need to be listed in R19(1) as a consultee?
	NCC Response:	<p>The County Council should be a consultee in respect of Requirement 19 (Code of Construction Practice - CoCP). Previous drafts of the dDCO had the County Council as a consultee, but we note from the applicant's statement this was apparently amended at the request of South Norfolk Council, though the applicants now acknowledge it was deleted in error. The development covers more than one administrative area and there will inevitably be</p>

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		<p>overlap between the CoCP and the CTMP for example the hours of operation which in turn impacts traffic volumes on local roads (for example tourist routes in North Norfolk). We wish to ensure there is consistency across both documents and the mechanism to achieve that is via Requirement 19.</p> <p>Having discussed this with the applicant we understand they are in full agreement with NCC.</p>
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Q2.22. Socio-economics effects

Q2.22.1 Effects on recreation, tourism and business

Q2.22.1.2	Applicant Local Authorities	<p>Correlation with Local Planning Policies</p> <p>NPS EN1 at Paragraph 5.12.4 sets out that applicants should refer to how the development's socio-economic impacts correlate with local planning policies.</p> <p>a) Applicant, confirm where this has been undertaken. b) LAs, please set out whether you consider the Proposed Development correlate with your local planning policies that relate to socio-economic matters.</p>
	NCC Response:	<p>The County Council has been working constructively with Equinor in respect of developing an Outline Employment and Skills Plan (OESP)/ Strategy (see below response to the OSEP).</p> <p>This NSIP as with other offshore windfarm projects making landfall in Norfolk has the potential opportunity to make significant contribution to the local economy. The County Council's Local Impact Report (LIR) under Section 4.5 - Socio-Economic, sets out the potential number of jobs and gross value added to the local economy associated with this project.</p> <p>The project's socio-economic benefits are clearly a matter which the County Council has welcomed through the planning process and the LIR indicates, <i>inter alia</i>, that "<i>the economic benefits of the above projects are welcomed and officers are working with Equinor to</i></p>

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		<p><i>develop an Employment and Skills Strategy. The County Council would wish to see the applicant develop through the development consent order (DCO) process a strategy to accompany the development and secure demonstrable benefits to both the local economy and workforce."</i></p> <p>The SEP and DEP projects will support more than 1800 full time equivalent (FTE) jobs per year across the UK and within East Anglia during the construction phase. The long-term operation of the two wind farms will also support additional direct employment, as well as through the supply chains which are developing to support the growth of the offshore wind sector in East Anglia. Additionally, SEP and DEP would create over £340 million in direct gross value added (GVA) over the construction period (Source Equinor).</p> <p>The Project is consistent with the County Council's emerging draft Climate Strategy (which is due to go to the Council's Cabinet for approval/adoption in May 2023) with regard to the following priority:</p> <ul style="list-style-type: none">• Support national decarbonisation of the Grid by expanding appropriate renewable energy generation across the county. <p>The Climate Strategy also makes specific reference to the opportunity to work closely with developers to influence skills and employment provision "so Norfolk's residents benefit from skills development and new job opportunities, relating to the offshore wind sector".</p> <p>There are also potential opportunities arising from Great Yarmouth Operations and Maintenance Campus, which "looks to capitalise on the now well-established offshore renewables sector off the east coast and the Enterprise Zone that covers sites in Great Yarmouth."</p> <p>However, as part of the emerging Climate Strategy it is important to note that the County Council is:</p> <ul style="list-style-type: none">• Supporting an Offshore Transmission Network to minimise the need for any onshore infrastructure associated with offshore wind farms.• Supporting the upgrading of onshore transmission infrastructure where this provides appropriate
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		benefits to Norfolk’s residents and businesses and helps in delivering clean energy for housing and employment growth in Norfolk.
Q2.23. Traffic and Transport		
Q2.23.1 Effects from Construction Vehicles on the Highway Network and Living Conditions		
Q2.23.1.2	Applicant Norfolk County Council	Matters of Dispute At ISH3 [EV-037] [EV-042], it was evident that there were still some matters being discussed between the Applicant and NCC. Provide an update on such discussions and if there remain any outstanding matters of dispute.
	NCC Response:	NCC and the applicant are in general agreement on all points. The outstanding issues relate to precise annotation/text in the OCTMP to capture the agreed points. The outstanding issues are: - Attlebridge – The visibility splays for the main compound were agreed some considerable time ago, but the drawings attached to the OCTMP are missing a height restriction in relation to one of the hedges. NCC understand the applicants have issued a change request which the ExA have recently accepted and that the applicants will submit an amendment to the drawings by deadline 3. Ability to review routes if they become unavailable for use – See Q2.23.2.1 below. Agreement has been reached; NCC are simply waiting for the applicants to formally submit an update to the text in the OCTMP. Oulton – NCC would not wish to see any works related traffic passing through Oulton. The outstanding issue relates to the mechanism for capturing this and defining what constitutes works related traffic. NCC are currently waiting for the applicants to provide appropriate text in the OCTMP.

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		<p>Cantley Road – NCC believe a drafting error may have occurred with the wrong road name used in the OCTMP and are awaiting clarification from the applicants, but at this stage do not foresee an issue.</p> <p>The Statement of Common Ground will be updated by Deadline 4.</p>
Q2.23.2 Traffic Management Proposals and Impacts on the Highway Network		
Q2.23.2.1	Applicant Norfolk County Council	<p>Ability to Review CTMP</p> <p>At ISH3 [EV-037] [EV-042] NCC set out that there is a need for it to be able to require a review of the CTMP once construction starts. Applicant and NCC, consider an appropriate mechanism within the dDCO and/or CTMP for this to be achieved.</p>
	NCC Response:	<p>Given the considerable time span for the construction works, a situation may arise whereby a route becomes unavailable for reasons totally unforeseeable – for example emergency statutory undertakers works; emergency road repairs; to avoid a road traffic accident etc.</p> <p>NCC would be content for a paragraph to be added to the OCTMP allowing the applicants to use an alternative route provided (1) the route originally intended for use is unavailable and (2) a diversion route is agreed in advance with the relevant Local Highway Authority.</p> <p>NCC and the applicant are in full agreement, and we have seen and approved draft text to cover this eventuality. NCC are simply waiting for the OCTMP to be updated.</p>
Q2.23.6 Effectiveness of Proposed Mitigation Measures		
Q2.23.6.2	Applicant Norfolk County Council	<p>Mitigation – Controls on HGV Routes</p> <p>The OCTMP [REP1-021] sets out that there will be no HGV traffic through: Attlebridge, Barford, Blind Lane, Cantley Road, Cawston, Horsford, Oulton, Plumstead and Weston Longville. Should restrictions on LVs also be required through these routes?</p>

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	NCC Response:	<p>Having regard to the number of vehicles involved: -</p> <p>NCC have no issue with LV's through Attlebridge; Barford; Cawston and Horsford.</p> <p>NCC would prefer not to have LV's pass through Plumstead and Weston Longville but given the numbers we are not insisting on that.</p> <p>Oulton – NCC would not wish to see any works related traffic associated with the development pass through Oulton. The roads are narrow with a lack of footways leading to potential pedestrian conflict. NCC are working with the applicants to define what constitutes “works related traffic” for the purposes of enforceability.</p> <p>Blind Lane – This is an issue for National Highways to answer rather than NCC, however NCC understand that no LV's will use this route. The dangerous junction with the A47 Trunk Road will be closed under a TTRO which will prevent access anyway and accordingly, NCC do not foresee any issues.</p> <p>Cantley Road – NCC believe a drafting error may have occurred with the wrong road name used in the OCTMP and are awaiting clarification from the applicants.</p>
Q2.24.3 Effects on Rivers, Streams, Canals and Ditches from Proposed Construction Methods and Crossing		
Q2.24.3.1	Applicant Environment Agency Lead Local Flood Authority	<p>Drainage Strategies</p> <p>The Applicant's response [REP1-036, Q1.24.1.9] sets out that drainage strategies for the construction phase, including temporary compounds, will be agreed with the EA and NCC, in their role as the LLFA, as appropriate. Are the EA and LLFA content that this is appropriate post consent?</p>
	NCC Response:	The LLFA accepts this approach.
Q2.24.3.3	Lead Local Flood Authority	<p>Ordinary Watercourses</p> <p>The Applicant has replied [REP2-040] to a number of concerns raised by the LLFA in their response to first</p>

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		written questions [REP1-079, Q1.24.3.1. Does the reply overcome the concerns of the LLFA?
	NCC Response:	<p>The LLFA have reviewed the applicant's response in REP2-040 ID41. The LLFA acknowledges that at present the applicant has not yet walked over the full length of the cable route and is therefore not able to confirm the number or location of all watercourse crossings as yet.</p> <p>The LLFA requests that before the applicant seeks to secure LLFA approval for the crossing of ordinary watercourses and the watercourse crossing method statement, the applicant should undertake a walkover of the whole cable route. This is requested to ensure there is a good understanding of the number and type of crossings prior to the review of the approval submission documents.</p>
Q2.24.4 Effectiveness of Mitigation Measures		
Q2.24.4.3	Applicant Environment Agency Lead Local Flood Authority	<p>Outstanding Concerns</p> <p>It was evident from discussions at ISH3 [EV-038] [EV-043] that there are still some outstanding matters being discussed between the Applicant, the EA and the LLFA. Provide an update on these discussions, setting out any areas that remain in dispute.</p>
	NCC Response:	<p>At present the applicant is preparing some further information to support their proposed surface water drainage design. The LLFA understand from the applicant they are aiming to provide an updated drainage strategy, hydraulic modelling report, flood risk assessment and the protective provisions by deadline 3.</p>