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Re: EN010109- Sheringham and Dudgeon Extension Projects

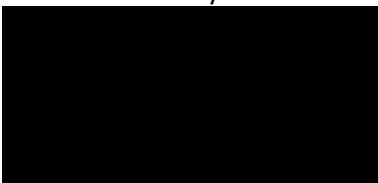
Updated Response to Deadline 5, including clarifications.

This is a response submitted to deadline 5 which provides updated input and clarification from the Norfolk Coast Partnership, on behalf of the Norfolk Coast Area of Outstanding Natural Beauty (AONB). Please note, Norfolk Coast AONB is not a statutory planning consultee.

This update has been provided following continuing conversations with the relevant authorities which make up the Norfolk Coast Partnership. We have further engaged and consulted with Norfolk County Council (NCC), North Norfolk District Council (NNDC) and Natural England (NE) in relation to this application, which is our remit as a partnership. We have benefitted from the local landscape expertise and national/regional policy knowledge of the Local Authorities, whilst as our statutory regulator NE have provided technical expertise specific to the AONB designation and offshore wind. Therefore, this updated response balances the views of all representative bodies within the Norfolk Coast Partnership.

Moving forwards, given the stage of the examination, the AONB defers to Natural England on any further technical matters.

Yours Sincerely



Dr Katy Owen
Protected Landscapes Manager

Q2.17.2 Effects on designated and historic landscapes, including Areas of Outstanding Natural Beauty and Ancient Woodland			
Q2.17.2.1	Norfolk Coast Partnership	Response to deadline 3	Updated response to deadline 5
		<p>Areas of Outstanding Natural Beauty Do you consider that the Proposed Development prejudices the special qualities of the affected AONB and, if so, state which ones and why conflict is considered to arise?</p> <p>The proposed development will impact upon:</p> <ul style="list-style-type: none"> • Special Quality 2: Strong and distinctive links between land and sea • Special Quality 3: Diversity and integrity of landscape, seascape, and settlement character • Special Quality 6: Sense of remoteness, tranquillity, and wildness <p>The proposed offshore development is well outside of the AONB designation boundary and adds to an already significant offshore wind infrastructure in this area. We believe that an extension is far preferable to creation of another site along the coast. We understand the turbines will be larger, but that visual impact will be mitigated as far as possible through appropriate design and lighting schemes to industry standard. The effects of the onshore elements, so far as they affect the AONB, are minimal, given the routing, undergrounding and mitigation of the cable construction activities.</p> <p>On balance, we do not feel that the proposed development will have a significant impact on the Special Qualities, beyond what is already there. Norfolk is a low-lying county at significant risk of the impacts of climate change. The need for renewable sources of energy to safeguard the future of the landscapes and wildlife of the AONB is clear. We do not feel the proposed development will significantly impact general public enjoyment and use of the AONB.</p>	<p>Areas of Outstanding Natural Beauty Do you consider that the Proposed Development prejudices the special qualities of the affected AONB and, if so, state which ones and why conflict is considered to arise?</p> <p>The proposed development will impact upon:</p> <ul style="list-style-type: none"> • Special Quality 2: Strong and distinctive links between land and sea • Special Quality 3: Diversity and integrity of landscape, seascape, and settlement character • Special Quality 6: Sense of remoteness, tranquillity, and wildness <p>Norfolk is a low-lying county at significant risk of the impacts of climate change. The need for renewable sources of energy to safeguard the future of the landscapes and wildlife of the AONB is clear. Whilst the proposed offshore development is well outside of the AONB designation boundary, it will add to an existing offshore wind development in this area. It is therefore likely that the development will cause adverse effects on the special qualities and statutory purpose of the AONB. However, we are not experts in offshore wind developments impacts and mitigation, therefore we would defer assessment of impact and level of mitigation required to the seascape technical expertise of Natural England.</p> <p>The effects of the onshore elements, so far as they affect the AONB, are minimal, given the routing, undergrounding and mitigation of the cable construction activities.</p>
Q2.18. Seascape and Visual Effects			
Q2.18.1 Effects on Designated and Historic Landscapes			
Q2.18.1.1	Norfolk Coast Partnership	Response to deadline 3	Updated response to deadline 5
		<p>The Existing Baseline and its Effect on the Statutory Purpose of the NCAONB NE states that the existing OWF installations have a compromising effect on the statutory purpose of the NCAONB [RR-063]. Respond, with reasoning.</p> <p>The Norfolk Coast AONB Management Plan (NCAONB-MP) 2019-2024 sets out the existing baseline. It provides information on what makes the AONB and defines Special Qualities. This</p>	<p>The Existing Baseline and its Effect on the Statutory Purpose of the NCAONB NE states that the existing OWF installations have a compromising effect on the statutory purpose of the NCAONB [RR-063]. Respond, with reasoning.</p> <p>The Norfolk Coast AONB Management Plan (NCAONB-MP) 2019-2024 sets out the existing baseline. It provides information on what makes the AONB and defines Special Qualities. This</p>

		<p>includes the existing offshore wind infrastructure on site.</p> <p>The 2019-24 NCAONB-MP provides an update to the assessment of the Special Qualities since designation. This notes effects on Qualities 2, 3, and 6, but also states that the coastal views and seascapes of the AONB remain distinctive in character. For reference:</p> <p>Quality 2: rated amber, due to existing and consented offshore wind (some grounds for concern)</p> <p>Quality 3: rated amber, due to development impacting the setting of the AONB.</p> <p>Quality 6: rated amber (unchanged since designation).</p> <p>Whilst we agree that the proposed development will impact on these three Special Qualities, it will not undermine the overall integrity of the AONB and its statutory purpose. This is a living landscape, continually shaped by human activities. Arguably the impacts of climate change (species loss, sea level rise, storm frequency) will impact the statutory remit of the AONB far more greatly than the proposed development.</p>	<p>includes the existing offshore wind infrastructure on site.</p> <p>The 2019-24 NCAONB-MP provides an update to the assessment of the Special Qualities since designation. This notes effects on Qualities 2, 3, and 6, but also states that the coastal views and seascapes of the AONB remain distinctive in character. For reference:</p> <p>Quality 2: rated amber, due to existing and consented offshore wind (some grounds for concern)</p> <p>Quality 3: rated amber, due to development impacting the setting of the AONB.</p> <p>Quality 6: rated amber (unchanged since designation).</p> <p>The proposed development could cause adverse impacts on these three Special Qualities.</p>
		Response to deadline 3	Updated response to deadline 5
Q2.18.1.2	Norfolk Coast Partnership	<p>The Extent of Additional Harm to the NCAONB What is your assessment of the effects of the Proposed Development on the NCAONB in EIA terms?</p> <p>We are not a statutory planning consultee and are unable to comment beyond the information already provided above. We would defer to NNDC / NE on this matter.</p>	<p>The Extent of Additional Harm to the NCAONB What is your assessment of the effects of the Proposed Development on the NCAONB in EIA terms?</p> <p>We are not a statutory planning consultee and do not currently hold technical expertise relevant to this topic. We would defer to the landscape/seascape technical and policy expertise of NCC, NNDC and NE on this matter.</p>
Q2.18.1.3	Norfolk Coast Partnership	<p>Response to deadline 3 Cumulative Impact Assessment Should a CIA be undertaken in order to inform the EIA to ensure that the impact of SEP and DEP on the statutory purpose of the NCAONB, in the context of the existing OWF, can be made?</p> <p>We are not a statutory planning consultee and are unable to comment beyond the information already provided above. We would defer to NNDC / NE on this matter.</p>	<p>Updated response to deadline 5 Cumulative Impact Assessment Should a CIA be undertaken in order to inform the EIA to ensure that the impact of SEP and DEP on the statutory purpose of the NCAONB, in the context of the existing OWF, can be made?</p> <p>We are not a statutory planning consultee and do not currently hold technical expertise relevant to this topic. We would defer to the landscape/seascape technical and policy expertise of NCC, NNDC and NE on this matter.</p>
Q2.18.1.4	Norfolk Coast Partnership	<p>Response to deadline 3 North Norfolk Heritage Coast Clarify your position on the qualities and significance of the Heritage</p>	<p>Updated response to deadline 5 North Norfolk Heritage Coast Clarify your position on the qualities and significance of the Heritage</p>

		<p>Coast, particularly the stretch within which the Proposed Development would be theoretically and actually visible. Set out where you consider harms would occur and what, if anything, could be done to minimise the harm or improve the visitor experience</p> <p>This non-statutory designation and the defined purpose is encompassed within the remit of the Norfolk Coast AONB and its strategic objectives. The design of the offshore structures and type/extent of lighting should be limited to minimise nocturnal impact on the undeveloped coast, as far as is possible within industry regulations for safety.</p>	<p>Coast, particularly the stretch within which the Proposed Development would be theoretically and actually visible. Set out where you consider harms would occur and what, if anything, could be done to minimise the harm or improve the visitor experience</p> <p>This non-statutory designation and the defined purpose is encompassed within the remit of the Norfolk Coast AONB and its strategic objectives. The design/type/extent of offshore and subsequent mitigation should work to conserve or enhance the Special Qualities and statutory remit of both designations. We are not a statutory planning consultee and do not currently hold technical expertise relevant to this topic. We would defer to the landscape/seascape technical and policy expertise of NCC, NNDC and NE on this matter.</p>
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Q2.18.2 Cumulative Effects

Q2.18.2.1	Norfolk Coast Partnership	<p>Response to deadline 3</p> <p>Cumulative Effects Are you satisfied with the list of projects included in the assessment of potential cumulative landscape and visual effects? If not, identify those projects that you believe should be included and indicate why you believe that they should be included.</p> <p>Yes, we are satisfied with the list of projects included in the assessment of cumulative landscape and visual effects.</p>	<p>Updated response to deadline 5</p> <p>Cumulative Effects Are you satisfied with the list of projects included in the assessment of potential cumulative landscape and visual effects? If not, identify those projects that you believe should be included and indicate why you believe that they should be included.</p> <p>We are not a statutory planning consultee and do not currently hold technical expertise relevant to this topic. We would defer to the landscape/seascape technical and policy expertise of NCC, NNDC and NE on this matter.</p>
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