



Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects

The Applicant's Comments on Natural England's
Deadline 6 Submission

Revision A

Deadline 7

July 2023

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Table of Contents

1 The Applicant's Comments on Natural England Deadline 6 Submission4

Table of Tables

Table 1 The Applicant's comments on Natural England's Cover Letter 5

1 The Applicant's Comments on Natural England Deadline 6 Submission

1. This document presents the Applicant's comments on Natural England's Deadline 6 cover letter. The Applicant has provided an updated **Marine Mammals Technical Note and Addendum (Revision B)** [document reference 16.14] within which responses to Natural England's Appendix D1 [REP6-029] are provided.

Table 1 The Applicant's comments on Natural England's Cover Letter

ID	Stakeholder Comment	Applicant Response
1. Natural England's Deadline 6 Submissions		
1	<p>Natural England has screened the relevant documents submitted by the Applicant at Deadline 5. Please find a summary of Natural England's position regarding these documents in Annex 1 below. Additionally, in Annex 1 below, Natural England highlight the responses that were deferred at Deadline 3 to Deadline 6. Natural England is also submitting the following detailed response, within the following thematic appendix:</p> <ul style="list-style-type: none"> EN010109 438574 SEP DEP Appendix D1 Natural England's Further Advice on the Marine Mammals Technical Note and Addendum [REP3-115] Deadline 6 	<p>Noted. The Applicant has provided an updated Marine Mammals Technical Note and Addendum (Revision B) [document reference 16.14] within which responses to Natural England's Appendix D1 [REP6-029] are provided.</p>
2. Norfolk Coast AONB [REP3-149] Response to the Examining Authority's Second Written Questions		
2	<p>Natural England understands the Norfolk Coast AONB are, at Deadline 6, submitting a clarification note to their response to the Examining Authority's Second Written Questions [REP3-149]. We will review this document and determine whether further correspondence is required.</p>	<p>Noted.</p>
3. Development Consent Order		
3	<p>We note that an updated version (Revision H) of the Development Consent Order (DCO) was submitted at Deadline 5. Natural England has reviewed the updated DCO [REP5-006] and has one comment to make. We note the changes to Schedules 12 and 13 Part 2 Condition 19, which add in the requirement to monitor cables installed within the MCZ. Can clarification be provided on what this monitoring will include? Natural England has raised concerns regarding the monitoring of the MCZ within our relevant and written reps [RR-063] and within our responses on the In-Principle Monitoring Plan [REP1-136] and [REP5-090]. Based on our initial review of this condition, we do not consider this change addresses those concerns.</p>	<p>As described in the Offshore In-Principle Monitoring Plan (Revision C) [document reference 9.5], it is proposed that as the tasks outlined in Table 4 of that document are progressed, the specific details and requirements for monitoring are discussed and agreed with Natural England and the MMO, once the detailed design, installation techniques and programme for SEP and DEP are confirmed. Consideration will be given to how monitoring within the MCZ can complement that undertaken for SOW and DOW rather than repeating what was undertaken for those projects. This approach would also apply to any related benthic ecology monitoring.</p> <p>It should also be noted that the Applicant has updated the Outline Cromer Shoal Chalk Beds (CSCB) Marine Conservation Zone (MCZ) Cable Specification, Installation and Monitoring Plan (CSIMP) (Revision B) [document reference 9.7] at Deadline 7 to</p>

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		secure the HDD exit location in the Weybourne Channel deposit as requested by Natural England.
4. Issue Specific Hearing 7		
4	<p>As advised in our Deadline 5 cover letter, Natural England will not be attending ISH 7. However, we note the addition of agenda item 9 concerning '<i>The extent, suitability and security of Habitats Regulation Assessment compensation for offshore ornithology</i>'.</p> <p>In terms of agenda items 9ii and 9iii, we highlight our broad support for the emerging 'secondary' compensation option at Blakeney Point. This is likely to have greater potential to add resilience to the compensation package for sandwich tern compared to the proposals for the Farne Islands. We continue to engage with the National Trust and the Applicant on this matter.</p>	<p>The Applicant has submitted at Deadline 7 Appendix 2 Sandwich Tern Compensation Document (Revision B) [document reference 5.5.2] which describes compensation proposals for North Norfolk Coast SPA (Blakeney Point) Predator Management.</p> <p>The Applicant shared a draft of the proposals with National Trust, Natural England and RSPB on 23 June 2023 and held a meeting with these parties on 30 June 2023 to further discuss and agree on required updates to the draft document.</p>
5	<p>Regarding item 9iv The Applicant's overall proposed package of compensatory measures, we refer the Examining Authority to our Relevant Representations [RR-063] and the following subsequent responses:</p> <ul style="list-style-type: none"> • Responses to the Examining Authority's First Written Questions (WQ1) [REP1-139] • Appendix C1 - Comments on 13.1 Gateshead Kittiwake Tower Modification [REP1-055] and 13.4 Sandwich Tern [REP1-058] - Quantification of Productivity Benefits Technical Notes [REP2-061] • Responses to the Examining Authority's Second Written Questions (WQ2) [REP3-147] • Other: EN010109 436963 SEP DEP Appendix C3 - NE Further Response to Offshore Ornithology Compensation D5 [REP5-092] • Responses to the Examining Authority's Third Written Questions (WQ3) [REP5-094] 	<p>The Applicant refers the Examining Authority to its:</p> <ul style="list-style-type: none"> • Responses to REP1-139 in REP2-040. • Responses to REP3-147 in REP4-028. • Responses to REP5-092 in REP6-015. • Responses to REP5-094 in REP6-013.
5. Offshore Ornithology		
6	For Deadline 5 document submissions pertaining to Offshore ornithology and compensation, Natural England are awaiting further updates and will provide detailed	As noted in the Apportioning and Habitats Regulations Assessment (HRA) Updates Technical Note (Revision D)

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	<p>responses at Deadline 7 (as set out in Annex 1). This will also include Natural England's updated positions on red-throated diver at Greater Wash and Outer Thames Estuary SPAs, and guillemot and razorbill at Flamborough & Filey Coast SPAs.</p>	<p>[document reference 13.3], the Applicant can confirm that, following discussions with Natural England on 26 June 2023, and notwithstanding its conclusions that AEoI on the red-throated diver feature of the Greater Wash SPA can be ruled out, the Applicant has committed to the following mitigation:</p> <ul style="list-style-type: none"> • Seasonal restriction on export cable laying activity within the SPA as secured by Condition 24 of Schedules 12 and 13 of the draft Development Consent Order (DCO) (Revision J) [document reference 3.1]; • Turbine restriction zone within the southeast corner of the SEP wind farm site resulting in an approximate 4.5% reduction in buildable area of SEP (as secured through an update to the Works Plans (Offshore) (Revision C) [document reference 2.7]); and • Updates to the best practice protocol for minimising disturbance to red-throated diver with respect to a firm commitment to utilise existing vessel transit routes and an additional commitment regarding considering the potential for crew transfer vessels to transit to the wind farm sites in convoy, where practicable. This is secured within the Outline Project Environmental Management Plan (PEMP) (Revision D) [document reference 9.10]. <p>The Applicant anticipates that agreement with NE can be reached by the close of Examination, to enable AEoI in respect of red-throated diver to be ruled out for all impact pathways.</p>