



Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects

The Applicant's Comments on Norfolk Coast
Partnership's Deadline 6 Submission

Revision A

Deadline 7

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1 The Applicant's Comments on Norfolk Coast Partnership Deadline 5 Submission

1. The Applicant notes the amended response from the North Coast Partnership ('NCP'), which was received as a late submission for Deadline 5 but accepted at the discretion of the Examining Authority [REP5-102]. The submission follows further discussions between the NCP; Norfolk County Council ('NCC'), North Norfolk District Council ('NNDC') and, most notably, Natural England ('NE').
2. As the covering letter states, the submission clarifies and updates the inputs to the Examination by NCP on behalf of the Norfolk Coast Area of Outstanding Natural Beauty ('NCAONB'). To assist, Table 2 (The Applicant's Comments on Norfolk Coast Partnership's Updated Responses to Second Written Questions) below has been colour coded to highlight the differences between the Deadline 3 and 5 responses as follows:
 - Text highlighted in **green** signifies no change has occurred in the Deadline 5 submission;
 - Text highlighted in **blue** text signifies text that has been deleted in the Deadline 5 submission.
 - Text highlighted in **yellow** text is new text in the Deadline 5 submission.
3. The Applicant recognises that, inevitably, views will vary between the representative bodies within the NCP; and notes that the updated submission attempts to balance the views of each participating organisation.
4. The role of the NCP, as confirmed on their website, is to manage the NCAONB on behalf of the four local authorities who share responsibility for it: NCC, NNDC, Borough Council of King's Lynn & West Norfolk, and Great Yarmouth Borough Council. NCP balances the statutory duty of conserving and enhancing natural beauty with non-statutory requirements to meet the NCAONB's social and economic needs. This means that protecting the landscape relies on a principle of sensitive management rather than on the attempt to preserve the area entirely unchanged.
5. Funding for the work of the Partnership is provided by Defra and the four local authorities on whose behalf it manages the Area. The Applicant understands that NE is the Statutory Regulator of NCP.
6. The Applicant has worked with stakeholders throughout the preparation of the Application and during the Examination to manage impacts. Specifically, with reference to Seascape, Landscape and Visual Impact, the Applicant has developed the scheme in consultation with NNDC, NE and NCP, amongst others. It is noted that these stakeholders work closely together albeit within a slightly different capacity. The minutes within the **Evidence Plan** [APP-030] from ETG2 dated 21 July 2021 state [emphasis added by the Applicant]:
7. "Affirmed that NE are not decision makers but have an advisor role. NCP have considerable local knowledge which NE would defer to. NE's remit is focussed around the special qualities of the AONB and the statutory mechanism by which the site is designated. NE's advice would typically focus on the technical elements whilst NCP will provide the local perspective. NE's advice in terms of visual impacts to the

AONB in addition to the existing windfarms was unlikely to change and that the decision by the examiners would rely on professional judgement” (ID6 and ID7).

8. The NCP has made clear in both its Deadline 3 and Deadline 5 submissions [REP3-149 and REP5-102] that Norfolk is a low-lying county at significant risk of the impacts of climate change and the NCP have stressed the need for renewable sources of energy to safeguard the future of the landscapes and wildlife of the Norfolk Coast Area of Outstanding Natural Beauty ('NCAONB').
9. It is noted that NCP's Deadline 5 submission differs from what was submitted at Deadline 3, which stated that 'we do not feel the proposed development will significantly impact general public enjoyment and use of the AONB' [REP3-149]. The Applicant's view aligns with the response that the NCP submitted at Deadline 3; and the response accorded with discussions held between the Applicant and NCP prior to the submission of the application and during the Examination.
10. The Examining Authority ('ExA') will be aware of the response provided to date by NNDC and the position they have concerning the potential impacts on the NCAONB, both as discussed at Issue Specific Hearing 4 Onshore Matters ('ISH4') and documented in their responses to the ExA's Written Questions, most notably in response to Q2.17.2.1 [REP3-125]. Equally, the ExA will be aware of the Applicant's position concerning the potential impacts on the NCAONB; which were also elaborated on and discussed and tested at ISH4 and in the Applicant's submitted responses to the ExA WQs.
11. The position of NE contrasts with that of NNDC, NCP and the Applicant. NE have consistently declined to attend the ISHs to discuss matters related to the Seascape and Visual Impact Assessment ('SVIA') and the potential impacts on the NCAONB. NE, again in contrast to NNDC, has relied purely on their original Relevant Representation ('RR') [RR-063]; and have not submitted further justification of their position on all matters relating to seascape and landscape impacts; and the effect on the NCAONB; either through further discussions (at ISHs) or written correspondence. The Applicant has not received any response to the Applicant's responses to Natural England's position, apart from simply referring back to their RR, as demonstrated in *Table 18 The Applicant's comments to Natural England responses to the Examining Authority's Second Written Questions 2.17* [REP3-147] of document **The Applicant's Comments on Responses to the ExA's 2WQ** [REP4-028].
12. The Applicant has made clear, both before and during the Examination, that adverse effects could arise as a result of the operation of the wind farm projects, which would affect a localised proportion of the overall NCAONB. In this regard, the Applicant sets out below (for the ExA's information) it's responses to the NE RR [inter alia] [RR-063], noting that all responses provided by the Applicant to NE's RR are relevant to the Applicant's position concerning the NCAONB:
13. ***Table 4.18.7 Applicant's comments on Natural England's Offshore Appendix H SLVIA relevant representation*** [REP1-033]
ID 1: "...Paragraph 534 of ES Chapter 25 Seascape and Visual Impact Assessment [APP-111] ('SVIA') confirms that the Applicant's assessment of the effects on SEP and DEP on the NCAONB would be of a moderate significance and adverse, and therefore not significant in EIA terms."

ID 2: "...Paragraphs 532 and 533 of ES Chapter 25 SVIA [APP-111] have assessed that the extent of SEP and/or DEP's visibility would affect a 'localised' proportion of the overall NCAONB. In SVIA terms, a 'localised extent' is defined as the "Site and surroundings up to 2km, or part of receptor area (up to approx. 25%)" [See Table 25-14: Extent of Effect, APP-111]. Therefore, it is reasonable to say that visibility of SEP and/or DEP along the coast (in light of the rationale outlined above) would constitute a comparatively small part of the overall NCAONB." [...]

14. **ES Chapter 25 SVIA** [APP-111] provides the Applicant's assessment of effects on visibility and seascape character. The submitted document, **Impacts on the Qualities of Natural Beauty (QNB) of Norfolk Coast Area of Outstanding Natural Beauty** [APP-311] provides the Applicant's assessment of the potential impacts on the Qualities of Natural Beauty of the NCAONB. The latter is a discrete assessment, focussing on how the key QNBs of the NCAONB could be affected as a consequence of construction and operation of the SEP and DEP. This is achieved by drawing together the conclusions of relevant assessments (undertaken for the ES) into a single report. It draws upon, where relevant, the assessment of effects on character and views contained within the SVIA. The Applicant's approach was discussed and agreed with the Expert Topic Group ('ETG') stakeholders at ETG Meeting 3 (Part 1 of 2, 02/02/2022).
15. Together, these two documents [APP-111 and APP-311] represent the Applicant's full assessment of effects in line with best practice guidance. Agreement to this approach between Natural England and the Applicant is recorded in NE SoCG [REP1-046].
16. Visibility is also only one aspect of the assessment. As noted in the **SVIA** [APP-111] at paragraphs 96 to 108, visibility will be influenced by the prevailing meteorological conditions. It is reasonable to assume that there would be a finite number of days per annum where the meteorological conditions would provide ideal viewing conditions and visuality to all of the turbines of SEP and/or DEP. Nevertheless, the assessment of potential effects has been made on the basis of a worst-case scenario, which assumes that the proposed SEP and/or DEP turbines would be most visible from within the study area.
17. The NCP has previously agreed and confirmed that the Applicant has had due regard to the NCAONB designation. The Applicant believes that the proposal would work, in so far as possible, to conserve and enhance the natural beauty of the NCAONB.
18. NNDC's position, as set out in their response to the ExA's Second WQ (Q2.17.2.1, see REP4-028) states [emphasis added by the Applicant]:

"NNDC considers that the onshore cable route will incur minor temporary effects during construction, and that the residual effects will be minimal. It is the off-shore element of the development that will impact the following special qualities of the AONB:

1. Sense of remoteness, tranquillity and wildness

This quality arises from the low level of development and population density in the area, resulting in dark night skies and a sense of wildness within the undeveloped coastal regions and habitats.

The existing off-shore wind infrastructure has already eroded this quality to a degree. The proposed development with significantly taller turbines extending from the existing arrays will make the structures more readily apparent from the land, especially so at night due to lighting. That said, this quality will still be experienced, albeit to a slightly lesser degree.

2. Strong and distinctive links between land and sea

It is recognised that the area's distinctive character is derived from not only visual links between land and sea, but also ecological, socio-economic and functional connections. Rather than erode this quality, this development reinforces three of these links, as a means of adapting to climate change and current geo-political forces.

3. Diversity and integrity of landscape, seascape, and settlement character

The dynamic coastline of North Norfolk is integral to the ecology, land-use, economy and settlement of the area. Coastal adaptation in this low-lying area has long been an influencing factor and this development represents large scale adaptation in terms of renewable energy."

19. NCP's updated response to Deadline 5 (including clarifications) states that the wind farm projects could / will cause adverse effects on the special qualities and statutory purpose of the NCAONB. NCP's updated response **does not state** that these effects could be significant (in EIA terms) and aligns with the positions of NNDC and the Applicant; contrasting with NE's position that potential effects would be significant (in EIA terms). Equally, NCP's updated response at Deadline 5 **does not suggest** that the integrity of the NCAONB would be breached; **nor does it suggest** that the general public's experience, enjoyment, and use of the NCAONB will be significantly impacted. In this context, the Applicant remains in overall alignment with NCP on these matters.

Table 1 The Applicant's Comments on Norfolk Coast Partnership Deadline 5 Submission

ID	Stakeholder Comment	Applicant Response
Updated Response to Deadline 5, including clarifications.		
1	<p>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.</p> <p>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.</p> <p>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.</p> <p>Moving forwards, given the stage of the examination, the AONB defers to Natural England on any further technical matters.</p>	<p>The Applicant notes the amended response from the North Coast Partnership ('NCP') received at Deadline 5 and has provided a comprehensive response above in Section 1 of The Applicant's Comments on Norfolk Coast Partnership Deadline 5 Submission [document reference 21.7].</p>

Table 2 The Applicant's Comments on Norfolk Coast Partnership's Updated Responses to Second Written Questions

ID	Question	Norfolk Coast Partnership Response at Deadline 3	Norfolk Coast Partnership Updated Response at Deadline 5	Applicant's Comment
Q2.17. Landscape and Visual Effects				
Q2.17.2 Effects on designated and historic landscapes, including Areas of Outstanding Natural Beauty and Ancient Woodland				
Q2.17.2.1	<p>Areas of Outstanding Natural Beauty</p> <p>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>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</p>	<p>The Applicant notes the clarification provided NCP regarding their updated position.</p> <p>In reply, the Applicant firstly refers the ExA to the commentary provided above in Section 1 The Applicant's Comments on Norfolk Coast Partnership Deadline 5 Submission [document reference 21.7]; in particular at paragraphs 17 to 21.</p> <p>The Applicant also refers the ExA to the response they have provided previously to this question in The Applicant's Comments on Responses to the ExA's 2WQ [REP4-028].</p>

ID	Question	Norfolk Coast Partnership Response at Deadline 3	Norfolk Coast Partnership Updated Response at Deadline 5	Applicant's Comment
		<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>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	<p>The Existing Baseline and its Effect on the Statutory Purpose of the NCAONB</p> <p>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 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>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 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>The Applicant notes the clarification provided NCP regarding their updated position.</p> <p>In reply, the Applicant firstly refers the ExA to the commentary provided above in Section 1 The Applicant's Comments on Norfolk Coast Partnership Deadline 5 Submission [document reference 21.7]; in particular at paragraphs 10 to 16.</p> <p>The Applicant also refers the ExA to the response they have provided previously to this question in The Applicant's Comments on Responses to the ExA's 2WQ [REP4-028].</p>

ID	Question	Norfolk Coast Partnership Response at Deadline 3	Norfolk Coast Partnership Updated Response at Deadline 5	Applicant's Comment
		<ul style="list-style-type: none"> Quality 2: rated amber, due to existing and consented offshore wind (some grounds for concern) Quality 3: rated amber, due to development impacting the setting of the AONB. Quality 6: rated amber (unchanged since designation). <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>	<ul style="list-style-type: none"> Quality 2: rated amber, due to existing and consented offshore wind (some grounds for concern) Quality 3: rated amber, due to development impacting the setting of the AONB. Quality 6: rated amber (unchanged since designation). <p>The proposed development could cause adverse impacts on these three Special Qualities.</p>	
Q2.18.1.2	<p>The Extent of Additional Harm to the NCAONB</p> <p>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>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>	<p>The Applicant notes the clarification provided by NCP regarding their updated position.</p>

ID	Question	Norfolk Coast Partnership Response at Deadline 3	Norfolk Coast Partnership Updated Response at Deadline 5	Applicant's Comment
Q2.18.1.3	<p>Cumulative Impact Assessment</p> <p>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>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>	<p>The Applicant notes the clarification provided by NCP regarding their updated position.</p>
Q2.18.1.4	<p>North Norfolk Heritage Coast</p> <p>Clarify your position on the qualities and significance of the Heritage 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>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>	<p>The Applicant notes the clarification provided by NCP regarding their updated position.</p>
<p>Q2.18.2 Cumulative Effects</p>				

ID	Question	Norfolk Coast Partnership Response at Deadline 3	Norfolk Coast Partnership Updated Response at Deadline 5	Applicant's Comment
Q2.18.2.1	<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>We are not a statutory planning consultee and to 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>	<p>The Applicant notes the clarification provided by NCP regarding their updated position.</p>