



Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects

Cover Letter

Revision A
Deadline 7
July 2023
Document Reference: 21.1

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The Planning Inspectorate
Temple Quay House, Temple Quay
Bristol, BS1 6PN

Our reference: C282-EQ-Z-GA-00055
Your reference: EN010109
10 July 2023

To whom it may concern,

Development Consent Order (DCO) application for Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects (EN010109) – Examination Deadline 7 Document Submissions

1. DEADLINE 7 SUBMISSIONS

We refer to the Planning Inspectorate's Rule 8 Letter dated 30 May 2023 (the Rule 8 Letter). In accordance with the deadlines at Annex A of the Rule 8 Letter, Equinor New Energy Limited (the Applicant) encloses the documents listed in **Annex 1** of this letter in response to Deadline 7.

2. STATEMENTS OF COMMON GROUND

In the Planning Inspectorate's Rule 6 Letter dated 13 December 2022 (the Rule 6 Letter), Annex F requested that the Applicant submit Statements of Common Ground (SoCG) with a number of Interested Parties and Other Parties. A number of draft SoCGs were submitted at previous deadlines. The Applicant now encloses a number of draft SoCGs and final SoCGs listed in **Annex 2** of this letter. **The Applicant's Statement of Commonality (Revision G)** [document reference 12.45] provides an update on the status of all SoCGs requested in Annex F of the Rule 6 Letter.

Please note there is a drafting error within some of the final SoCGs. Some of the final SoCGs make reference in the main body of the text to it being a 'draft SoCG', however, the Applicant can confirm that the revisions submitted at this deadline are the final signed SoCGs. The Applicant has not amended the drafting error because the revisions submitted at this deadline have been agreed and signed by stakeholders.

The Applicant is continuing to engage with stakeholders to agree final SoCGs and will set out final positions at Deadline 8 in the final Statement of Commonality.

3. ADDITIONAL SUBMISSIONS

The Applicant encloses a number of additional submissions being made at Deadline 7. These are new documents, or updates to previously submitted documents where the Applicant considers that these provide information, clarifications and updates useful to both the Examining Authority and Interested Parties or are in response to points raised in the **Examining Authority's Fourth Written Questions (WQ4)** [PD-021]. **Annex 3** of this letter contains a list of additional documents that have been submitted by the Applicant.

4. WITHOUT PREJUDICE OFFSHORE WORKS PLANS

The Applicant encloses Works Plans (Offshore) (Without Prejudice) [document reference 2.7.2] in response to Q4.19.1.6 of the **Examining Authority's Fourth Written Questions (WQ4)**. The Applicant highlights in **The Applicant's Comments on Maritime and Coastguard Agency Deadline 6 Submission** [document reference 21.11] the alternative 'exclusion zone' it has reluctantly put forward represents the only option the Applicant can see for a without prejudice submission as requested. The Applicant remains in disagreement with the MCA on the matter of the need for a No Structures Area to mitigate navigational risk. The Applicant would encourage the ExA to consider the following questions, which the Applicant hope the MCA may provide response to in comments on its Deadline 7 submission.

The Applicant considers that the following important points remain unclear as regards the MCA's position:

1. Would the MCA accept that whilst some vessels may plan for safe passing distance of 1nm, that there is substantial evidence that not all vessels do and that there is no mandatory safe passing distance?
2. Does the MCA now accept that the controlling depth in the Outer Dowsing Channel is 10m as confirmed by Trinity House?
3. If so, does the MCA accept that this undermines its argument that the PIANC guidance supports its proposed 'buoy to buoy' exclusion zone?
4. Does the MCA accept that the PIANC guidance it has sought to apply was intended to apply where ships are passing between two wind farms, which is not the case here?
5. Given that the MCA agreed at ISH7 that the scenario presented represented the worst case for collision and allision, does this not address their initial concern regarding whether the worst-case constriction of traffic had been assessed?
6. What new information prompted their concern regarding the red line boundary of DEP-N at Deadline 1 in February 2023, given that it had had multiple opportunities to raise that concern before and did not do so?

We would be grateful if you could kindly acknowledge safe receipt of this letter and the enclosures. If we can be of any assistance, please do not hesitate to contact Emma Eshelby (██████████) in the first instance.

Yours faithfully,

Sarah Chandler
Development & Consents Manager, SEP&DEP
Equinor

ANNEX 1 - DOCUMENTS SUBMITTED IN RESPONSE TO DEADLINE 7

- **The Applicant's Comments on the Report on Implications to European Sites** [document reference 21.2]
- **Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 7** [document reference 21.3]
- **Written Summary of the Applicant's Oral Submissions at Compulsory Acquisition Hearing 2** [document reference 21.4]
- **The Applicant's Responses to the Examining Authority's Fourth Written Questions** [document reference 21.5]
- **Supporting Documents for the Applicant's Responses to the Examining Authority's Written Questions** [document reference 21.5.1]
- **The Applicant's Comments on National Trust's submission in lieu of attendance at Issue Specific Hearing 7** [document reference 21.6]
- **The Applicant's Comments on Norfolk Coast Partnership's Deadline 6 Submission** [document reference 21.7]
- **The Applicant's Comments on North Norfolk District Council's Deadline 6 Submission** [document reference 21.8]
- **The Applicant's Comments on Mr Clive Hay-Smith, Mr Paul Middleton and Priory Holdings Limited's Deadline 6 Submission** [document reference 21.9]
- **The Applicant's Comments on Mr Derek Aldous' Deadline 6 Submission** [document reference 21.10]
- **The Applicant's Comments on the Maritime and Coastguard Agency's Deadline 6 Submission** [document reference 21.11]
- **The Applicant's Comments on the Marine Management Organisation's Deadline 6 Submission** [document reference 21.12]
- **The Applicant's Comments on Natural England's Deadline 6 Submission** [document reference 21.13]
- **The Applicant's Comments on Norfolk Rivers Internal Drainage Board's Deadline 6 Submission** [document reference 21.14]
- **The Applicant's Comments on Orsted Hornsea Project 3 Deadline 6 Submission** [document reference 21.15]
- **The Applicant's Comments on Oulton Parish Council's Deadline 6 Submission** [document reference 21.16]
- **The Applicant's Comments on Perenco's Deadline 6 Submission** [document reference 21.17]
- **The Applicant's Comments on Yvonne Odrowaz's Deadline 6 Submission** [document reference 21.18]
- **The Applicant's Comments on UK Chamber of Shipping's Deadline 5 Submission** [document reference 21.19]
- **The Applicant's Comments on Trinity House's Deadline 5 Submission** [document reference 21.20]
- **Guide to the Application (and Glossary) (Revision J)** [document reference 1.3]

ANNEX 2 – STATEMENTS OF COMMON GROUND SUBMITTED AT DEADLINE 7

- **Final Statement of Common Ground with South Norfolk Council (Revision C)** [document reference 12.6]
- **Final Statement of Common Ground with Broadland District Council (Revision C)** [document reference 12.7]
- **Final Statement of Common Ground with Norfolk County Council (Revision E)** [document reference 12.17]
- **Final Statement of Common Ground with Trinity House (Revision B)** [document reference 12.19]
- **Draft Statement of Common Ground with National Highways (Revision D)** [document reference 12.22]
- **Final Statement of Common Ground with Ministry of Defence (Revision B)** [document reference 12.27]
- **Final Statement of Common Ground with UK Chamber of Shipping (Revision B)** [document reference 14.22]
- **Draft Statement of Common Ground with Norwich Airport (Revision C)** [document reference 16.23]
- **Final Statement of Common Ground with Anglian Water (Revision B)** [document reference 19.12]
- **Final Statement of Common Ground with Historic England (Onshore and Offshore)** [document reference 20.19]
- **The Applicant's Statement of Commonality (Revision G)** [document reference 12.45]
- **The Applicant's Statement of Commonality (Revision G) (Tracked)** [document reference 12.45.1]

ANNEX 3 – ADDITIONAL SUBMISSIONS AT DEADLINE 7

- **Land Plans (Revision E)** [document reference 2.3]
- **Works Plans (Offshore) (Revision C)** [document reference 2.7]
- **Works Plans (Offshore) (Without Prejudice)** [document reference 2.7.2]
- **Draft Development Consent Order (Revision J) (Clean)** [document reference 3.1]
- **Draft Development Consent Order (Revision J) (Tracked Revisions I/J)** [document reference 3.1.1]
 - The Applicant has been unable to produce a full tracked changed version of the draft DCO showing revisions between A and J due to technical issues with the software used to produce the full track changed version of the draft DCO. The Applicant is working to resolve this issue for Deadline 8.
- **Schedule of Changes to Revision J of the Draft Development Consent Order** [document reference 3.1.2]
- **Explanatory Memorandum (Revision H) (Clean)** [document reference 3.2]
- **Explanatory Memorandum (Tracked - Revisions G/H)** [document reference 3.2.1]
- **Explanatory Memorandum (Tracked - Revisions A/H)** [document reference 3.2.2]
- **Book of Reference (Revision G) (Clean)** [document reference 4.1]
- **Book of Reference (Revision G) (Tracked)** [document reference 4.1.1]
- **Schedule of Changes to Revision G of the Book of Reference** [document reference 4.1.2]
- **Statement of Reasons (Revision E) (Clean)** [document reference 4.3]
- **Statement of Reasons (Revision E) (Tracked)** [document reference 4.3.1]
- **Appendix 2 Sandwich Tern Compensation Document (Revision B) (Clean)** [document reference 5.5.2]
- **Appendix 2 Sandwich Tern Compensation Document (Revision B) (Tracked)** [document reference 5.5.2.3]
- **Annex 2A Outline Sandwich Tern Compensation, Implementation and Monitoring Plan (Revision B) (Clean)** [document reference 5.5.2.1]
- **Annex 2A Outline Sandwich Tern Compensation, Implementation and Monitoring Plan (Revision B) (Tracked)** [document reference 5.5.2.1.1]
- **Appendix 4 Guillemot and Razorbill Compensation Document (Revision D) (Clean)** [document reference 5.5.4]
- **Appendix 4 Guillemot and Razorbill Compensation Document (Revision D) (Tracked)** [document reference 5.5.4.2]
- **Stage 1 Cromer Shoal Chalk Beds Marine Conservation Zone Assessment (Revision B) (Clean)** [document reference 5.6]
- **Stage 1 Cromer Shoal Chalk Beds Marine Conservation Zone Assessment (Revision B) (Tracked)** [document reference 5.6.5]
- **Environmental Statement – Volume 3 – Appendix 4.1 - Crossing Schedule (Revision E) (Clean)** [document reference 6.3.4.1]

- **Environmental Statement - Volume 3 –Appendix 4.1 - Crossing Schedule (Revision E) (Tracked)** [document reference 6.3.4.1.1]
- **Environmental Statement – Volume 3 - Appendix 10.2 Underwater Noise Modelling Report (Revision B) (Clean)** [document reference 6.3.10.2]
- **Environmental Statement – Volume 3 – Appendix 10.2 Underwater Noise Modelling Report (Revision B) (Tracked)** [document reference 6.3.10.2.1]
- **Addendum to the Planning Statement** [document reference 9.1.2]
- **Offshore In-Principle Monitoring Plan (Revision C) (Clean)** [document reference 9.5]
- **Offshore In-Principle Monitoring Plan (Revision C) (Tracked)** [document reference 9.5.1]
- **Outline Cromer Shoal Chalk Beds Marine Conservation Zone Cable Specification, Installation and Monitoring Plan (Revision B) (Clean)** [document reference 9.7]
- **Outline Cromer Shoal Chalk Beds Marine Conservation Zone Cable Specification, Installation and Monitoring Plan (Revision B) (Tracked)** [document reference 9.7.4]
- **Outline Fisheries Liaison and Coexistence Plan (Revision B) (Clean)** [document reference 9.8]
- **Outline Fisheries Liaison and Coexistence Plan (Revision B) (Tracked)** [document reference 9.8.1]
- **Outline Project Environmental Management Plan (Revision D) (Clean)** [document reference 9.10]
- **Outline Project Environmental Management Plan (Revision D) (Tracked)** [document reference 9.10.1]
- **Outline Code of Construction Practice (Revision F) (Clean)** [document reference 9.17]
- **Outline Code of Construction Practice (Revision F) (Tracked)** [document reference 9.17.1]
- **Outline Ecological Management Plan (Revision D) (Clean)** [document reference 9.19]
- **Outline Ecological Management Plan (Revision D) (Tracked)** [document reference 9.19.3]
- **The Applicant’s Statutory Undertakers Position Statement (Revision D) (Clean)** [document reference 12.46]
- **The Applicant’s Statutory Undertakers Position Statement (Revision D) (Tracked)** [document reference 12.46.1]
- **Apportioning and Habitats Regulations Assessment Updates Technical Note (Revision D) (Clean)** [document reference 13.3]
- **Apportioning and Habitats Regulations Assessment Updates Technical Note (Revision D) (Tracked)** [document reference 13.3.1]
- **Sandwich Tern - Quantification of Productivity Benefits (Revision C) (Clean)** [document reference 13.4]
- **Sandwich Tern - Quantification of Productivity Benefits (Revision C) (Tracked)** [document reference 13.4.1]
- **Marine Mammals Technical Note and Addendum (Revision B) (Clean)** [document reference 16.14]
- **Marine Mammals Technical Note and Addendum (Revision B) (Tracked)** [document reference 16.14.1]
- **Junction Modelling Clarifications Technical Note** [document reference 21.21]

