



Norfolk County Council

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Your Ref: EN010109
Date: 6 December 2023

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Dear Sir or Madam,

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010

Application by Equinor New Energy Limited (“the Applicant”) for an Order granting Development Consent for the proposed Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Project (“the Proposed Development”)

I refer to your letter dated 22 November 2023, seeking additional comments from Norfolk County Council as Local Highway Authority.

Q.20 Traffic and Transport

We have been asked to comment on the Applicant’s response to the Rule 17 letter [REP8-052, ID 13, page 274], regarding maximum daily vehicle trips and the Applicant’s proposed without-prejudice additional sub-paragraph (5) to Requirement 15.

As Local Highway Authority we **agree** with the applicants when they say there are existing controls which secure HGV movements, however we **disagree** with them when they say paragraph 5 repeats the existing control and therefore does not meet the tests set out in the National Policy Statement on Energy (EN-1).

The existing control is contained at paragraph 1 of Requirement 15, which indicates that no works can commence until a CTMP has been approved by the LPA (in consultation with NCC) and that the final CTMP must accord with the Outline CTMP.

As currently written, the applicants have the ability to vary the **figures** contained in the CTMP. They would still comply with the ethos of Requirement 15 (1) in that there would still be a maximum daily number of HGV’s on the routes contained at Appendix A but the **figures** themselves could change. If the Secretary of State wishes to place the matter beyond any doubt, then in our view the proposed additional paragraph 5 is required.

To put the above into perspective, the Hornsea 3 offshore wind farm currently being developed by Orsted (Planning Inspectorate reference EN0100080) has a very similar Requirement in relation to controlling traffic numbers through the CTMP:-

18.—(1) No phase of the connection works may commence until written details of a construction traffic management plan (which accords with the outline construction traffic management plan) for that phase has been submitted to and approved by the relevant planning authority in consultation with the relevant highway authority.

However, we have received several requests from Orsted seeking to vary the **figures** contained in the Outline CTMP - for example see South Norfolk and Broadland District Council Planning application reference 2023/2567 (link below).

[2023/2567 | National Infrastructure Development Consent Order for Hornsea Project Three Offshore Wind Farm \(Planning Inspectorate Reference: EN010080\) Discharge of requirements \(conditions\) for Provision of \(18\) Onshore Converter Station Construction Traffic Management Plan \(CTMP\) | Hornsea Project Three Offshore Wind Farm \(southnorfolkandbroadland.gov.uk\)](https://southnorfolkandbroadland.gov.uk/2023/2567)

We have also received other similar requests from Orsted which haven't as yet been submitted to the LPA as formal applications.

As Local Highway Authority, Norfolk County Council has no strong view with regard to either including sub paragraph 5 or leaving it out. The reason I say that is paragraph 1 of Requirement 15 indicates that no works can commence until a CTMP has been approved by the LPA (in consultation with NCC) and will not agree to any changes to the figures that we are not content with. Again this is evident in our response to the South Norfolk and Broadland District planning application 2023/2567 mentioned above - see comments in thereto in relation to additional HGV traffic on link 149 of that application.

But I would stress Norfolk County Councils assessment is restricted to assessing highway impacts only. We note the ExA asked for paragraph 5 to be included not for highway reasons but because the ExA were of the view:-

"...it is imperative that such maximums are not exceeded to ensure that impacts do not occur above those that have been assessed in the ES, including for other receiving environments such as air quality and noise and vibration that rely upon estimated vehicle movements."

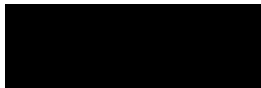
Accordingly the Secretary of State needs to decide if paragraph 5 is required for reasons beyond those controlled by the LPA or NCC under paragraph 1 of Requirement 15 (as appears to have been the concern of the ExA) in which case paragraph 5 seals the figures.

Q. 21 Noise and Vibration – Trenchless Crossing Works at Night

We have been invited to comment on the Applicant's response to the Rule 17 letter [REP8-052, ID 14, page 315], regarding restricting night time HDD works to emergencies to three locations only as specified by the ExA.

We believe the question is one for the District Council to respond to rather than NCC and we have no comments to make.

Yours faithfully

A solid black rectangular box used to redact the signature of the Developer Services Manager.

Developer Services Manager
for Executive Director for Community and Environmental Services