



THE PLANNING ACT 2008
THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE)
RULES 2010

Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Project

Planning Inspectorate Reference: EN010109

Secretary of State Further Information Request
(22 November 2023)

Appendix 1 Offshore In-Principle Monitoring Plan

20 December 2023

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17. During the Examination there was discussion as to the condition wording for the Offshore In-Principle Monitoring Plan and, in particular whether concerns raised in any post-monitoring would be addressed. The Marine Management Organisation, Natural England and the Applicant are invited to comment on a possible addition to Condition 20 (of Schedules 10 and 11) and Condition 19 (of Schedules 12 and 13) of the draft Deemed Marine Licences: *“(7) In the event that the reports provided to the MMO under sub-paragraph (4) identify that there are significant adverse effects post-mitigation, the Applicant shall notify the MMO and the relevant ANCBs of this in writing with a view to agreeing to a course of adaptive management/mitigation to reduce such effects. In the event that this adaptive management/mitigation requires a separate consent, the Applicant shall apply for such consent. Any such agreed or approved adaptive management/mitigation should be implemented in full to a timetable first agreed in writing with the MMO.”*

Natural England and the MMO have consulted one another and jointly advise a text amendment to the following recognising that determining ‘significance’ can be subjective and that sometimes impacts are unforeseen:

“(7) In the event that monitoring reports provided to the MMO under sub-paragraph (4), identifies impacts which are beyond those predicted within the Environmental Statement/Habitat Regulations Assessment, adaptive management/mitigation may be required. An Adaptive Management/Mitigation Plan to reduce effects to within what was predicted within the Environmental Statement/Habitat Regulations Assessment, unless otherwise agreed in writing by the MMO, must be submitted alongside the monitoring reports submitted under sub-paragraph (4), including timelines and associated monitoring to test effectiveness. This plan must be agreed with the MMO in consultation with the relevant SNCB’s to reduce effects to an agreed suitable level for this project. Any such agreed or approved adaptive management/mitigation should be implemented and monitored in full. In the event that this adaptive management/mitigation requires a separate consent, the Applicant shall apply for such consent.”

Whilst this in part addresses the concerns raised in Natural England’s final examination response on the IPMP at Deadline 8 [Rep8-101], we remain concerned with the scope of the monitoring.

As previously advised during examination [REP8-101] and [REP5-090] the proposed monitoring doesn’t fully link to outstanding risks and issues and the need to test effectiveness of mitigation measures. We reiterate that where the IPMP has been deficient for existing projects, the default has been for monitoring to be minimal and not providing the required evidence to draw conclusions with confidence - which perpetuates potentially unnecessary monitoring requirements including those for further project monitoring where results are inclusive.