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Our ref: 13015 483222
Your ref: EN010109 SADEP "The NMC Application"



National Infrastructure
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Dear Sir/Madam

Sheringham Shoal Extension Project (SEP) and Dudgeon Extension Project (DEP) Offshore Wind Farms. Consultation on a Non-Material Change application ("The NMC Application"). Regulation 7 of The Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011

The Planning Inspectorate has consulted online on 25 July 2024 regarding the application by Equinor New Energy Limited ("the Applicant") seeking the following non-material changes to the Development Consent Order (DCO) 2024:

- Increases to the maximum total rotor-swept area for SEP and DEP;
- Corresponding increases to the minimum air gap (that being the distance between the lowest point of the rotating blade of a wind turbine generator and the highest astronomical tide);
- Increases to the maximum number and length of interlink cables and the maximum number of interlink cable crossings;
- Increase the maximum area and volume of cable protection for the interlink cables and for the DEP infield cables; and
- A reduction to the maximum number of DEP infield cable crossings.

Natural England has reviewed the following accompanying documentation:

- EN010109-002371-26.2 Supplementary Environmental Report (Revision A)
- EN010109-002369-25.5 Tracked Changed DCO (Revision B)

The following constitutes Natural England's formal statutory response.

Offshore Ornithology

Natural England agrees with the Applicant's conclusions in the Supplementary Environmental Report Appendix A, namely that for the ornithology species examined for the three Rotor Swept Area (RSA) Bands, based on Option 2 of the Band (2012) collision risk model (CRM):

- *"For NMC RSA Band 1, it is noted that for Sandwich tern, kittiwake, lesser black-backed gull and common tern, a non-material increase (0.01 birds per annum) is predicted for the combined effects of SEP and DEP, when compared to the DCO parameters;*
- *For all other scenarios, collision estimates are unchanged or reduced when compared to DCO collision estimates.*
- *For all scenarios proposed for the NMC submission, there would be no measurable increase in collision mortality, and no change to the assessment conclusions presented in the relevant DCO submission documents."*

Therefore, Natural England advises that, for collision mortality the worst case scenario assessed in the Environmental Statement (ES) would remain unchanged by the proposed amendments.

As such, we advise that no different effects would arise for the Flamborough & Filey Coast Special Protection Area (SPA), Greater Wash SPA and the North Norfolk Coast SPA than already assessed within the Report to Inform the Appropriate Assessment (RIAA) and the Secretary of State's Appropriate Assessment.

Use of the Mean Density Estimates only for Collision Risk Modelling (CRM)

Natural England's advice is that CRM outputs should be provided for the 95% upper confidence interval density estimates in addition to mean density estimates, and this remains our position, including for non-material change applications. However, Natural England recognises that for this particular NMC application, undertaking the CRM based on only the mean density estimates has been sufficient to demonstrate there would be no measurable increase in collision mortality, and that the 95% upper confidence interval value, which is used to generate compensatory requirements, will not materially increase.

Other Receptors

Natural England has no comments regarding the other ES topics relevant to our Statutory Remit.

Yours faithfully

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