



Sheringham and Dudgeon Extension
Projects Case Team
Planning Inspectorate
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Planning Inspectorate reference: EN010109
Our reference: DCO/2019/00004

02 September 2024

Dear Sir/Madam,

Non-Material Change to the Sheringham Shoal & Dudgeon Offshore Windfarm Extension Order 2024

On 25 July 2024 the Marine Management Organisation (MMO) received notice that the Sheringham Shoal Offshore Wind Farm Extension Project (SEP) and Dudgeon Offshore Wind Farm Extension Project (DEP) have submitted a non-material change (NMC) application to The Department for Energy Security and Net Zero (DESNZ) to make changes to the Sheringham Shoal & Dudgeon Extension Offshore Wind Farm Order 2024 (The Order). This document comprises the MMO's comments in respect of this non-material change application.

The non-material changes being sought are as follows:

- Increase in the Rotor Swept Area for DEP/SEP (from 1.00 kilometres squared (km²) to up to 1.42km² for SEP and from 1.30 km² to up to 1.85 km² for DEP);
- Corresponding increases to the minimum air gap (being the distance between the lowest point of the rotating blade of a wind turbine generator and highest astronomical tide);
- An increase to the maximum number of interlink cables from three to four in the event two Offshore Substation Platforms (OSPs) are constructed (Scenarios 1(c), 1(d), 2 or 3 as defined in the Order) or in the case that only DEP is constructed (scenario 1(b) as defined in the Order) and from seven to eight in the event one OSP is constructed for SEP and DEP (in the SEP wind farm site, Scenario 4 as defined in the Order) together with related increases to interlink cable protection area and volume and to the maximum number of interlink cable crossings for Scenarios 1(b), 1(c), 1(d), 2, 3, and 4; and
- An increase to the maximum area and volume of infield cable protection and a reduction in infield cable crossings associated with Work No. 2B for all scenarios.

The MMO has also received a deemed marine licence variation with the same information.

The MMO has no objection to the amendments proposed in the non-material change application, providing existing mitigation measures remain in place. The MMO has reviewed the supporting assessments that have been provided and have included comments below.



1 Supplementary Environmental Report (Revision A)

- 1.1 The Supplementary Environmental Report concludes that for marine mammals, the proposed NMC and DML variation will result in no new, or materially different, likely significant effects. The primary reason, as stated in Table 3.1 and Table 3.2 of the Supplementary Environmental Report, is because the underwater noise modelling results and underwater noise assessments in Marine Mammals Technical Note and Addendum would not change as a result of this NMC.
- 1.2 Regarding underwater noise impacts from vessels, the number of construction and Operation & Maintenance vessels assessed in the Marine Mammals Technical Note and Addendum would not change, as a result of this NMC and therefore accordingly the assessments would not change. The MMO agrees with the conclusions that the proposed variations are unlikely to result in any new, or materially different, likely significant effects on marine mammals with respect to underwater noise.

2 Sheringham and Dudgeon Extension Projects EMF Assessment (Revision B)

- 2.1 The Electric and Magnetic Field (EMF) assessment acknowledges the uncertainties in predicting the levels of EMF which will result in a response from fish receptors. It is demonstrated that larger receptors will be more greatly affected than smaller receptors, however, levels of EMF will reduce exponentially with distance from the source. As with the original project design set out in the Environmental Statement (ES), cable protection and burial along with the use of single 3-core cables will be used to minimise the levels of EMF that fish receptors are exposed to. The MMO agrees with this assessment.
- 2.2 It is anticipated that there will be no overall change in the levels of EMF from the project, although there will be a greater potential for EMF exposure due to the additional cable, this will not result in a greater overall level due to the properties of EMF. This is because EMF from multiple different sources do not simply add together. The impacts of EMF to fish receptors has been assessed as minor adverse (consistent with that of the ES), based on the evidence provided the MMO agrees with this assessment.

3 Summary

The MMO is content with the proposed changes and will work with the Planning Inspectorate and Secretary of State to ensure any change to the Deemed Marine Licence is appropriate.

Yours Sincerely

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