

20 March 2019

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Our ref:  
VJR2/JT8/47583.46  
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Dear Sirs

**Norfolk Vanguard Offshore Wind Farm Development Consent Order (DCO) (the Project)**  
**Case reference no: EN010079**  
**The Applicant: Norfolk Vanguard Limited**

**Deadline 5 Submissions**

We write further to the Planning Inspectorate's Rule 8 letter dated 19 December 2019 (the **Rule 8 letter**). In accordance with the deadlines at Annex A of the Rule 8 letter, we enclose the following in response to Deadline 5:

1. Comments on response to the Examining Authority's (**ExA**'s) further written questions
2. Responses to further information requested by the ExA in the form of responses to actions points arising from the Issue Specific Hearings
3. Updated Statements of Common Ground (**SoCGs**) (where relevant)
4. Updated Statement of Commonality of SoCGs
5. Applicant's updated Guide to the Application.

The Applicant refers the ExA to the Guide to the Application (Document Reference 1.4 (Version 6)) for a full list of documents submitted by the Applicant as part of Deadline 5.

**Action Points**

Onshore Environmental Matters:

An updated Cumulative Impact Assessment (**CIA**) has been provided to consider the potential cumulative construction traffic associated with Norfolk Vanguard and Hornsea Project Three (document reference: ExA; ISH1; 10.D5.1). The CIA also includes an assessment of cumulative traffic related noise and vibration and cumulative traffic air quality impacts. This is provided in response to Action Point 9 (published on 8 February 2019) from Issue Specific Hearing 1 held on 5 February 2019. The CIA also includes an updated review of accident data on road links shared by both Norfolk Vanguard and Hornsea Project Three construction traffic, in response to Action Point 8 from Issue Specific Hearing 1.

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A request was also made at Issue Specific Hearing 1 that the A47 Cable Crossing Access Technical Note (**CCATN**), being discussed between the Applicant and Highways England, should be submitted at Deadline 5 (Action Point 2). The Applicant has continued to discuss the content of this note with Highways England and has been sharing information directly with Highways England. There remain a small number of items to address prior to the finalisation of the CCATN and the Applicant has agreed with Highways England that it would be preferable to issue this to the examination in its final form, rather than a version with outstanding items. This will be submitted to the examination at the earliest opportunity and, to the extent that it would assist the ExA, the Applicant can update the ExA further at Issue Specific Hearing 4 or 5.

#### Offshore Environmental Matters:

The ExA, in their further written question 3.30 (issued on 27 February 2019), requested that the Applicant provides a gannet cumulative impact assessment by Deadline 4. The Applicant responded (document reference: ExA; FurtherWQ; 10.D4.6) to explain that gannet cumulative displacement is not an impact that has previously been required for offshore wind farm (OWF) applications and, as a consequence, there are no previous assessments of this nature. Instead, it is necessary to review the original applications for each relevant project. This aspect was discussed with NE during a call on the 8 March. The Applicant noted in response to question 3.30 that they would endeavour to provide this assessment by Deadline 5. The work to collate abundance estimates for North Sea OWFs is underway, however collation of these datasets has taken longer than anticipated. This work is still in progress and the Applicant will endeavour to submit this assessment at Deadline 6.

#### Statement of Common Ground (SoCGs)

As the Applicant noted at Deadline 4, the Applicant has progressed matters with stakeholders in relation to SoCGs. A number of SoCGs were submitted at Deadline 4, as outlined in the Guide to Application (document reference 1.4 (version 5)). The Applicant has been in discussions with certain stakeholders to finalise outstanding SoCGs which were not submitted at Deadline 4. Accordingly, the Applicant is submitting revised SoCGs with Cadent Gas Limited, Ministry of Defence, National Federation of Fishermen's Organisations, National Grid, Natural England, and Royal Society for the Protection of Birds.

Consultation between the Applicant and NATS En-Route Safeguarding remains on-going. The Applicant considers that good progress has been made and that it would be worthwhile finalising these discussions in order to submit an agreed form of the SoCG at Deadline 6.

The Applicant has outlined this approach within the Statement of Commonality (document reference: ExA; Commonality; 10.D1.4 (version 3)).

To the extent that it would assist the ExA, the Applicant can also update the ExA further in respect of progress with stakeholders and SoCGs at Issue Specific Hearing 4 or 5.

#### Protective Provisions

The protective provisions with Cadent Gas Limited (Cadent) and National Grid Electricity Transmission Plc/National Grid Gas Plc (National Grid) are now agreed. The parties are anticipating concluding contractual terms to allow Cadent and National Grid to withdraw their objection to the Order shortly; the parties hope to reach agreement before the Compulsory Acquisitions hearing on the 28 March 2019.

We would be grateful if you could kindly confirm safe receipt.

Yours faithfully

**Womble Bond Dickinson (UK) LLP**