

Norfolk Boreas Offshore Wind Farm Applicant's Response to Broadland District Council's Local Impact Report

Applicant: Norfolk Boreas Limited
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Photo: Ormonde Offshore Wind Farm

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Glossary of Acronyms

BDC	Broadland District Council
CIA	Cumulative Impact Assessment
DCLG	District Council Local Guidance
DCO	Development Consent Order
dDCO	Draft Development Consent Order
ES	Environmental Statement
GNLP	Greater Norwich Local Plan
HGV	Heavy Goods Vehicle
HVDC	High Voltage Direct Current
LIR	Local Impact Report
OLEMS	Outline Landscape and Ecological Management Strategy
OTMP	Outline Traffic Management Plan
SoCG	Statement of Common Ground

1 Introduction

In accordance with the Rule 8 letter published on the 19th of November 2019, Broadland District Council has submitted a Local Impact Report (LIR) at Deadline 2 in relation to the application for a Development Consent Order (DCO) for Norfolk Boreas Offshore Wind Farm (the Project) as submitted by Norfolk Boreas Limited (the Applicant). This provides a summary of Broadland District Council's position on the Application on various matters including:

- Relevant Development Proposals
- Policy Framework
- Impacts of the Proposals
 - a) The cumulative impacts of the construction traffic on the village of Oulton and the surrounding area.
 - b) Removals of hedgerows and trees from installation of the cable route.
 - c) The cumulative impacts of construction traffic on the village of Cawston and the surrounding area.
 - d) The visual, public amenity and environmental impacts of the respective cable corridors crossing at a point north of Reepham
- Conclusion

2 Broadland District Council Local Impact Report

2.1 Summary Response

The Applicant has responded to matters raised by Broadland District Council below. A Statement of Common Ground (SoCG) (ExA.SoCG-3.D2.V1/REP2-047) has also been produced between Broadland District Council and Norfolk Boreas Limited, which provides a summary of matters agreed and those under further discussion, as submitted at Deadline 2. The Applicant will continue to engage with Broadland District Council on points still under discussion in order to reach agreement in due course. Where further progress is made between the Applicant and Broadland District Council, an updated version of the SoCG will be submitted at an appropriate deadline. The final position of the SoCG will be submitted on or before Deadline 9 on the 29th of April 2019.

2.2 Full Response

Table 2.1 Applicant's response to Broadland District Council Local Impact Report

Broadland District Council Local Impact Report	Applicant's Response
<p>1.0 INTRODUCTION</p> <p>1.1 This document is Broadland District Council's (BDC) Local Impact Report (LIR), which has been produced in accordance with the advice and requirements set out in the Planning Act 2008 (as amended) as 'a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area)'.</p> <p>1.2 In preparing this LIR the District Council has had regard to the DCLG's 'Guidance for the examination of applications for development consent' (2015) and the Planning Inspectorate's Advice Note One, 'Local Impact Reports' (2012).</p> <p>1.3 The LIR relates only to the onshore elements and identifies the most relevant planning policies and the main issues that BDC has concerns over.</p>	<p>Noted.</p>
<p>2.0 DETAILS OF THE PROPOSAL</p> <p>2.1 This project is for an offshore windfarm by Norfolk Boreas which would generate 1,800 MW of electricity. The location of the Boreas offshore array is off the coast of Norfolk within the North Sea. The grid connection for the generated electricity is at Necton in Breckland District Council's administrative area. The key components of the project within BDC's area is the position and implications of the underground cable corridor and the works and activities required for its construction.</p> <p>2.2 The wind farm consists of up to 180 turbines off the coast of Norfolk and will make landfall at Happisburgh in North Norfolk with a buried cable route between landfall and the grid connection. The route will run through three Local Authorities; North Norfolk, Broadland and Breckland District Councils.</p> <p>2.3 As the Norfolk Boreas project is submitted by Vattenfall Wind Power Ltd. who also submitted the Norfolk Vanguard offshore wind farm proposals approximately one year ago (see 3.2 below) the two projects are linked but two scenarios are proposed and need to be assessed separately:</p> <p>Scenario 1 – Norfolk Vanguard proceeds to construction and installs ducts and other shared enabling works for the Norfolk Boreas project, including the</p>	<p>Noted.</p> <p>The Applicant refers to Environmental Statement (ES) Chapter 5 Project Description (APP-218) for a full project description and to clarify under Scenario 1 that the cable pulling works, as described, will be undertaken by Norfolk Boreas.</p>

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<p>pulling of two pairs of HVDC cables and associated communication cables through pre-installed ducts along the length of the cable route installed as part of the Norfolk Vanguard project, a 12km running track alongside the 45m wide cable route and a 300m extension to the access road installed by Norfolk Vanguard to the onshore substation. A cable logistics area is proposed on an existing hardstanding on Heydon Road in the village of Oulton to allow the storage of cable drums and associated materials e.g. jointing kits. The facility may also accommodate a site office, welfare facilities and associated temporary infrastructure to support the cable pulling works.</p> <p>Scenario 2 – Norfolk Vanguard does not proceed to construction and the Norfolk Boreas project undertakes all works required as an independent offshore wind farm project including the installation of two pairs of HVDC cables along the 45m wide cable corridor route with mobilisation areas and compounds for trenchless crossings positioned in proximity to the cable route. The mobilisation areas will store equipment and provide welfare facilities, they will have a maximum area of 100m x 100m (or 150m x 100m if combined with a trenchless crossing compound) although the size will depend on the operational requirements and site constraints. During cable pulling, materials will be delivered directly to the jointing locations or a cable logistics area on an existing hardstanding in the village of Oulton as in scenario 1.</p>	
<p>3.0 RELEVANT DEVELOPMENT PROPOSALS</p> <p>3.1 An offshore wind farm project by Orsted known as Hornsea Three which proposes to generate 2,400 MW of electricity from an offshore array of up to 300 wind turbines off the Norfolk coast in the North Sea was submitted to the Planning Inspectorate for an Order Granting Development Consent under PINS ref: EN010080. The transmission type proposed is either HVAC or HVDC. It is proposed to take landfall at Weybourne in North Norfolk with a connection to the grid at a substation near Swardeston in South Norfolk Council's administrative area. The underground cable route for the Hornsea Three project runs through BDC's area and the main cable construction compound is located with BDC's area at a former airfield in the village of Oulton. The project has been through its public examination process and the</p>	<p>Noted.</p> <p>ES Chapter 33 Onshore Cumulative Impacts (APP-246) provides a summary of the Cumulative Impact Assessment (CIA) for the onshore topics and these are also addressed further within specific chapters (ES Chapter 19 – 31 for onshore (APP-232 to APP-244). The CIA assesses potential cumulative impacts of the project with Norfolk Vanguard (Scenario 1), Hornsea Project Three and other relevant development proposals.</p> <p>Planning application ref: 20130860 - Biomass Renewable Energy Facility was not included in the cumulative assessment given that permission for this application was refused in 2013.</p>

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<p>findings and conclusions arising from the examination together with the Examining Authority's recommendations have been sent to the Secretary of State for Business, Energy & Industrial Strategy for her decision.</p> <p>3.2 Norfolk Vanguard is another offshore wind farm project which proposes to generate 1,800 MW of electricity from an offshore array of up to 257 wind turbines off the Norfolk coast in the North Sea was also submitted to the Planning Inspectorate for an Order Granting Development Consent under PINS ref: EN010079. The transmission type proposed is HVDC. It is proposed to take landfall at Happisburgh in North Norfolk with a connection to the grid at a substation near Necton in Breckland District Council's administrative area. The underground cable route for the Vanguard project runs through BDC's area with mobilisation zones along its length and the proposed cable route for the Orsted Hornsea Three project crosses it at a point north of Reepham within BDC's area. The project has been through its public examination process and the findings and conclusions arising from the examination together with the Examining Authority's recommendations have been sent to the Secretary of State for Business, Energy & Industrial Strategy for her decision.</p> <p>3.3 BDC planning application ref: 20130860 - Biomass Renewable Energy Facility, Associated Landscaping and Vehicular Access, Oulton Airfield, The Street, Oulton. Refused November 2013. Appeal dismissed June 2014. Appeal ref: APP/K2610/A/14/2212257.</p>	
<p>4.0 POLICY FRAMEWORK</p> <p>4.1 The Development Plan comprises the following documents; the government's National Planning Policy Framework (2019) is a material consideration alongside the suite of planning guidance. The following policies are considered to be relevant to the consideration of this application:</p> <ul style="list-style-type: none"> a) Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS) 2011 (amendments adopted 2014) <ul style="list-style-type: none"> Policy 1 - Addressing climate change and protecting environmental assets 	<p>The Applicant refers to the SoCG with Broadland District Council (ExA.SoCG-3.D2.V1 / REP2-047) submitted at Deadline 2, where it is agreed by both parties that the legislation has been interpreted correctly.</p>

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<p> Policy 2 - Promoting good design Policy 3 - Energy & Water Policy 5 - The Economy </p> <p> b) Broadland Development Management Plan DPD (DM DPD) 2015 Policy GC4 – Design </p> <p> Policy GC5 - Renewable Energy Policy EN1 - Biodiversity and Habitats Policy EN2 - Landscape Policy EN3 - Green Infrastructure Policy EN4 - Pollution Policy TS2 - Travel Plans & Transport Assessments Policy TS3 - Highway safety Policy CSU5 - Surface Water Drainage </p> <p> c) Site Allocations DPD 2016 </p> <p> 4.2 Supplementary Planning Document: i) Broadland Landscape Character Assessment SPD 2013 </p> <p> 4.3 The Greater Norwich Local Plan (GNLP) – The Plan which covers BDC, Norwich City and South Norfolk Councils is being prepared and is presently at its Regulation 18 consultation stage, the latest consultation on new, revised and small sites closed in December 2018 and covers further submitted sites and revisions to some sites already consulted upon and follows an earlier consultation from January to March 2018. The next stage is the Regulation 18 Draft Consultation which is due to be published in January 2020. It is anticipated that the GNLP will be adopted late 2021. </p>	
<p> 5.0 IMPACTS OF THE PROPOSALS </p> <p> 5.1 It should be noted that the onshore issues of Water Resources and Flood Risk, Ecology, Ornithology, Archaeology and Traffic and Transport are matters that BDC has agreed to defer to Norfolk County Council who have the professional officers to comment in each subject area. </p>	<p> Noted. The Applicant refers to the SoCG with Norfolk County Council (ExA.SoCG-19.D2.V1/ REP2-050) where these matters are discussed further and agreed where appropriate. </p> <p> The Applicant has responded below to each of the specific points identified by Broadland District Council. </p>

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<p>5.2 As such BDC has concentrated on the specific onshore matters of Ground Conditions & Contamination (Chapter 19 of ES), Land Use & Agriculture (21) Noise & Vibration (25), Air Quality (26), Human Health (27), Cultural Heritage (28), Landscape & Visual Impact (29), Tourism & Recreation (30), Socio-economics (31) and Onshore Cumulative Impacts (33). Outstanding material impacts over which BDC raises unresolved concerns, namely:</p> <ul style="list-style-type: none"> a) The cumulative impacts of the construction traffic associated with the proposed Norfolk Vanguard wind farm, the Hornsea Three wind farm and the Norfolk Boreas wind farm on the village of Oulton and the surrounding area. b) The installation of the cable route requires the removal of sections of hedgerow and trees; these removals will have to be assessed using the criteria set out in the Hedgerow Regulations 1997. c) The cumulative impacts of the construction traffic associated with the proposed Norfolk Vanguard wind farm, the Hornsea Three wind farm and the Norfolk Boreas wind farm on the village of Cawston and the surrounding area. d) The visual, public amenity and environmental impacts of the respective cable corridors crossing at a point north of Reepham. <p>Taking each of these in turn:</p>	
<p><u>a) The cumulative impacts of the construction traffic associated with the proposed Norfolk Vanguard wind farm, the Hornsea Three wind farm and the Norfolk Boreas wind farm on Oulton and the surrounding area.</u></p> <p>5.3 Separate cable corridors and associated developments within BDC are proposed as part of the Hornsea Three offshore wind farm project and the Norfolk Vanguard offshore wind farm project. The cumulative impacts of these two nationally significant infrastructure proposals together with the current Norfolk Boreas wind farm project need to be considered. In this</p>	<p>An assessment of cumulative noise, vibration and air quality effects associated with Norfolk Boreas and Hornsea Project Three along The Street at Oulton has been assessed and included in the Application (in section 25.9 of ES Chapter 25 Noise and Vibration (APP-238) and section 26.8 of ES Chapter 26 Air Quality (APP-239)).</p> <p>Further assessments specifically considering the noise, vibration and air quality effects of vehicles idling and accelerating in proximity to the Old Railway Gatehouse at Oulton was undertaken by Norfolk Vanguard at Deadline 7 and is</p>

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<p>respect it is noted that Hornsea Three have identified one main cable construction compound for all deliveries of cables and associated equipment and materials as well as the construction workers welfare facilities on part of the former airfield to the south west of the village of Oulton, outside of the designated Conservation Area which gain access to the B1149 via The Street. In addition, two mobilisation zones are proposed to the south west of Oulton as part of the Norfolk Vanguard project. Under both scenarios 1 & 2 Norfolk Boreas proposes a cable logistics area for storage of cable drums and other equipment and may also accommodate a site office, welfare facilities and associated temporary infrastructure to support the cable pulling works. All operators are proposing to use The Street in Oulton, which is a narrow country lane to connect to the B1149.</p> <p>5.4 There are concerns about whether the construction programmes will overlap and therefore cause significant disruption in the village and the surrounding area in a wide variety of potential impacts for an extended period as a result of up to three nationally significant infrastructure projects taking place at the same time. Reference is made at para. 3.3 above to a previous planning application (BDC ref: 20130860 and the subsequent appeal) for an anaerobic digester plant on part of the former Oulton Airfield, where the Hornsea Three is to be located, which was refused and dismissed at appeal on grounds that the proposed development would have an unacceptable impact on highway safety and convenience and be likely to result in material harm to the living conditions of the residential occupiers of The Old Railway Gatehouse, which is a single storey dwelling immediately adjacent to The Street, Oulton, with reference to noise and disturbance. The Norfolk Boreas cable logistics area is on Heydon Road to the east of The Street and all vehicles accessing it will travel along The Street in proximity to The Old Railway Gatehouse.</p> <p>5.5 Both the Hornsea Three and Norfolk Vanguard projects propose a mitigation scheme along The Street to include passing bays and junction improvements to the B1149/The Street junction and in proximity to The Old Railway Gatehouse which includes a re-grading of the carriageway to reduce the hump in the road, the formation of waiting areas either side of the property so that only single way vehicles can pass with a reduced speed limit and night time noise limits, together with the installation of an agreed noise barrier to</p>	<p>presented as Appendix 1 to the SoCG with Broadland District Council (ExA.SoCG-3.D2.V1 / REP2-047); this included cumulative effects with Hornsea Project Three.</p> <p>Mitigation was proposed in the form of a cap on the maximum number of daily HGV movements, a temporary speed restriction, regarding the road surface in proximity to the Old Railway Gatehouse, incorporation of passing places along The Street and priority warning signs in proximity to The Old Railway Gatehouse. With these mitigation measures in place residual impacts related to noise, vibration and air quality are not significant based on the agreed Environmental Impact Assessment criteria. These measures, consistent with those agreed by Norfolk Vanguard and Hornsea Project Three, have been adopted by Norfolk Boreas and are captured within section 4.3.2 of the Outline Traffic Management Plan (OTMP) (document 8.8, REP1-022) and secured through DCO Requirement 21. These measures will serve to mitigate the effects of Norfolk Boreas alone and cumulatively with Hornsea Project Three, and it should be noted that scheme will be implemented under both scenarios.</p>

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<p>the side of the garden of the Old Railway Gatehouse and possible replacement double glazing to the property. The District Council will expect that the Norfolk Boreas project also commits to these works in both scenarios.</p>	
<p><u>b) The installation of the cable route requires the removal of sections of hedgerow and trees; these removals will have to be assessed using the criteria set out in the Hedgerow Regulations 1997.</u></p> <p>5.6 An assessment of the Hedgerow Regulations 1997 is required to establish if the removal of sections of hedgerow, necessary to allow the installation of the cable route, would be considered as important due to the flora, fauna or historical significance associated with them. If sections of hedgerows and trees are removed and cannot be replaced following installation of the cables this will have a greater long term significance to the landscape of the locations and some form of mitigation would be appropriate which could include replacement planting on adjacent land.</p>	<p>In the Applicant's Comments on Relevant Representation (AS-024) Table 17, Row 23, the Applicant confirmed that:</p> <p>Hedgerows surveyed to date have been assessed against the criteria set out in the Hedgerow Regulations 1997. For those hedgerows located within unsurveyed areas of the onshore project area, these will be surveyed post-consent. An assessment of all hedgerows against the criteria in the Hedgerow Regulations 1997 will be presented within the Ecological Management Plan submitted to discharge Requirement 24 of the dDCO post consent.</p> <p>The Applicant also refers to ES Chapter 22 Onshore Ecology (APP-235) which assessed the potential impacts on hedgerow removal associated with the construction of the onshore cable corridor. Proposed mitigation measures are provided in the Outline Landscape and Ecological Management Strategy (OLEMS) (REP11-020), which is secured by DCO Requirement 24.</p> <p>The OLEMS (REP1-020) sets out that all hedgerows will be reinstated along the cable route.</p>
<p><u>c) The cumulative impacts of the construction traffic associated with the proposed Norfolk Vanguard wind farm, the Hornsea Three wind farm and the Norfolk Boreas wind farm on the village of Cawston and the surrounding area.</u></p> <p>5.7 It is apparent that the proposed route of heavy goods construction traffic serving part of the cable corridor will use the B1145 and pass through the centre of the village of Cawston along Aylsham Road and the High Street, which is a two way road that is narrow in places particularly in the village centre with no parking restrictions along its length and a significant number of vehicles park on the highway, especially along the High Street. The western part of Cawston is a Conservation Area and a number of properties along the High Street are listed residential and commercial properties which are located in close proximity to the road, some are Grade II* listed.</p>	<p>An assessment of cumulative noise, vibration and air quality impacts associated with Norfolk Boreas and Hornsea Project Three along the B1145 through Cawston has been assessed (section 25.9 of ES Chapter 25 (APP-238) and section 26.8 of ES Chapter 26 (APP-239)).</p> <p>Mitigation is proposed, consistent with those agreed by Norfolk Vanguard and Hornsea Project Three, in the form of a cap on the maximum number of daily HGV movements, temporary speed restrictions, resurfacing the road, incorporation of formalised parking and parking restriction, localised pavement widening and priority warning signs. With these mitigation measures in place residual impacts related to noise, vibration and air quality are not significant based on the agreed Environmental Impact Assessment criteria. These measures are captured within</p>

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<p>5.8 The information provided to date indicates that heavy goods construction traffic driving in both directions into and through Cawston from the east and also return trips into and through Cawston from the west, will significantly increase as a result of the Norfolk Vanguard project, together with vehicles associated with the separate Orsted Hornsea Three project. The actual range of the increase, the type of vehicular movements that will be generated by the Norfolk Boreas project and the route of construction traffic on the highway network around Cawston must be considered and fully assessed.</p> <p>5.9 Both the Hornsea Three and Norfolk Vanguard projects propose a traffic mitigation scheme within the village centre of Cawston along the High Street to include dedicated on-street parking areas, footway widening/c carriageway narrowing with the formation of waiting areas either side of the centre so that only single way HGV's can manoeuvre through a section of the village centre at a time with a reduced speed limit and the carriageway re-surfaced. The mitigation scheme is still to be finalised in the respective Construction Traffic Management Plans, should approval for each project be forthcoming. As a result of the Norfolk Vanguard proposals the total number of HGV's passing through the centre of Cawston were reduced and Norfolk Boreas should commit to match these or even reduce the level of HGV's required in scenario 2 with further detailed analysis of the additional cumulative traffic impacts as a result of development in scenario 1.</p> <p>5.10 BDC welcomes continued involvement and consultation with the applicant, the Highway Authority and Cawston Parish Council as the number, type and periods of construction traffic activity are clarified and whether alternative routes for the construction traffic can be utilised. Consideration needs to be given to any impacts on heritage assets, highway safety and the residential amenities of occupiers in Cawston including issues of noise, disturbance and vibration arising from the increased heavy goods construction traffic in the village. Until an acceptable alternative has been secured BDC has serious concerns about the impact of the cumulative significant increase in heavy goods construction traffic in Cawston as a result of up to three nationally significant infrastructure projects.</p>	<p>section 4.3.3 of the Outline Traffic Management Plan (OTMP) (PRE1-022) and secured through DCO Requirement 21.</p> <p>Following discussions with Cawston Parish Council and Broadland District Council as part of Norfolk Vanguard, the Applicant has sought to further optimise the construction programme to reduce the Norfolk Boreas peak traffic as low as practicable. As such, the Applicant is able to commit to a Norfolk Boreas Scenario 1 peak of 112 (reduced from 133) daily HGV movements (in both the single project and cumulative scenario) and for Norfolk Boreas Scenario 1 peak of 61 daily HGV movements (in both the single project and cumulative scenario).</p> <p>The mitigation scheme is still to be finalised and the Applicant is currently refining the scheme design and will continue to engage with Norfolk County Council, Broadland District Council and Cawston Parish Council as the scheme design progresses (for further details see the Applicant's Comments on Responses to the ExA First Written Questions (document ExA.WQ-1.D3.V1, section 14.0 Traffic and Transport).</p> <p>Any material changes to the scheme will be reviewed in the context of the Air Quality and Noise and Vibration assessments presented in the Norfolk Boreas Environmental Statement and the Heritage Assessment (included as Appendix 2 of the Statement of Common Ground with Broadland District Council, document reference ExA.SoCG-3.D2.V1, REP2-047).</p>

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<p><u>d) The visual, public amenity and environmental impacts of the respective cable corridors crossing at a point north of Reepham.</u></p> <p>5.11 Finally an assessment of the visual, public amenity and environmental impacts of the area north of Reepham, where the respective cable corridors cross needs to be carefully considered. The Hornsea Three cable corridor is 80m wide including a 60m wide permanent easement and the Norfolk Vanguard cable corridor is 45m wide, under both Norfolk Boreas scenarios the width of the cable corridor is 45m wide therefore the crossing point will be a significant focus of development over a pro-longed period. The area in which the respective corridors cross is an agricultural field with residential properties in the locality. The timing of these works needs to be co-ordinated to ensure that the visual, public amenity and environmental impacts are managed and minimised.</p>	<p>A cumulative impact assessment of Norfolk Boreas and Hornsea Project Three has been included within each onshore chapters of the Environmental Statement, this includes any potential impacts from the cable crossing at Reepham.</p> <p>ES Chapter 29 Landscape and Visual Impact Assessment (APP-242) section 29.8.1 sets out a detailed assessment of the potential cumulative impacts of the onshore cable route in combination with the Hornsea Project Three onshore cable route. Under Scenario 2, the construction of the Norfolk Boreas onshore cable route in addition to the Hornsea Project Three onshore cable route could have a short term significant cumulative effect on the views of walkers on an approximate 200m section of Marriott's Way, but would not have significant effects on the remaining parts of this route or on any other landscape or visual receptors. However, land and hedgerows will be reinstated post construction and, therefore, the effect will be short and reversible, resulting in no residual impact.</p>
<p>6.0 CONCLUSION</p> <p>6.1 With regards to the Draft Development Consent Order, the District Council does not wish to raise an objection in principle; however as set out in this Local Impact Report there are material issues and concerns relating to specific requirements of the on-shore proposals that the Council considers should be addressed.</p> <p>6.2 The Council at this stage therefore wishes to reserve its final position due to ongoing discussions with the applicant.</p>	<p>The Applicant has responded to the points raised by Broadland District Council and will continue to engage throughout the Examination and through the SoCG (ExA.SoCG-3.D2.V1 / REP2-047).</p>