

Norfolk Boreas Offshore Wind Farm Applicant's Comments on Deadline 16 Submissions

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Author: Royal HaskoningDHV

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Glossary of Acronyms

AEoI	Adverse Effect on Integrity
BEIS	Department for Business, Energy and Industrial Strategy
CCC	Committee on Climate Change
CSIMP	Cable Specification, Installation and Monitoring Plan
DAS	Design and Access Statement
DCO	Development Consent Order
dDCO	Draft Development Consent Order
DML	Deemed Marine Licence
EIA	Environmental Impact Assessment
EIFCA	Eastern Inshore Fisheries and Conservation Authority
ETG	Expert Topic Group
HHW	Haisborough, Hammond and Winterton
HP3	Hornsea Project 3
HRA	Habitats Regulations Assessment
HVDC	High Voltage Direct Current
JNCC	Joint Nature Conservation Committee
MMMP	Marine Mammal Mitigation Protocol
MMO	Marine Management Organisation
MoU	Memorandum of Understanding
NE	Natural England
NSAG	Necton Substations Action Group
ORGH	Old Railway Gatehouse
PC	Parish Council
RSPB	Royal Society for the Protection of Birds
SAC	Special Area of Conservation
SIP	Site Integrity Plan
SNCB	Statutory Nature Conservation Body
SNS	Southern North Sea
SoCG	Statement of Common Ground
TWT	The Wildlife Trusts

1 Applicant's Comments on Deadline 16 Submissions

1. This document contains the Applicant's comments on submissions by Interested Parties at Deadline 16 of the Norfolk Boreas Examination. Comments have been provided separately on the responses to the Rule 17 Request for further information (document reference: ExA.PDR.D17.V1).

1.1 REP16-017, Cawston Parish Council, Deadline 16 Submission

Summary of Submission	Applicant's Comments
<p>Cawston Parish Council (CPC) appreciate the Applicant's clear distinction between their proposals and those of Hornsea Three; but question why Hornsea Project Three (HP3) still intend to use 3.3 metre drums and abnormal loads when it appears that this can be avoided by Norfolk Boreas. CPC consider that these factors undermine the HIS as there is a possibility that the two projects will be operating at the same time. They refer back to concerns set out in CPCs D15 submission.</p>	<p>The Applicant has comprehensively set out the position on abnormal loads in the Applicant's comments on Deadline 15 Submissions [AS-081]. Subsequently, the Applicant has provided further clarification to CPC that Norfolk Boreas will not be generating any abnormal loads through Cawston and this commitment will be secured in an updated OTMP to be submitted at Deadline 18.</p> <p>It is reiterated that Hornsea Project Three's specification for cable drums was published at the end of their examination [HP3 REP-048]. This specification informed Hornsea Project Three inception and development of the HIS scheme presented to the Norfolk Boreas examination and has been a key consideration in the Applicant's finalisation of the HIS. This specification has not changed during the Applicant's development and finalisation of the HIS and therefore is not considered new information to inform the validity of the mitigation.</p> <p>The HIS has been designed for standard vehicles with potential for momentary traffic management measures required for cable drum movements if required. Any additional traffic management measures which may need to be deployed by Hornsea Project Three during their cable drum deliveries will need to be agreed with Norfolk County Council and secured through the Hornsea Project Three final CTMP and are in addition to the HIS.</p>
<p>CPC reiterate their D6 submission comments on the Road Safety Audit commenting that:</p> <p><i>"The brief given to the auditors only includes Boreas traffic numbers. We suggest that the cumulative numbers of H3 and Vanguard/Boreas together might well have caused the auditors to be more emphatic in their conclusions."</i></p> <p>They also reiterate their request for the RSA to be re-evaluated in light of the HP3 cable drum movement proposals, and request clarification of the Vattenfall plans for such loads.</p>	<p>The Applicant has continued to respond to and provide clarification on all the specific concerns raised by CPC throughout the examination on the HIS. This includes concerns raised over Abnormal Indivisible Loads (AILs), Road Safety Audit, pedestrian amenity, speed limits, road safety, carriageway width, oversailing wing mirrors and the potential for delays and blockages. The Applicant refers to the following submissions where detailed responses have been provided on these matters:</p> <ul style="list-style-type: none"> • Comments on Deadline 15 Submissions [AS -081] Section 1.1 responses to cable drum transportation, validity of the Road Safety Audit, and working hours. • Hornsea Project Three Technical Note Cawston [REP14-043] clarified HGV
<p>CPC are concerned that the HP3 drum movements (at an average of two or three journeys a day) requiring either suspension of parking or closure of footpath undermines the theoretical safety of the HIS which relies on parking to create a</p>	

Summary of Submission	Applicant's Comments
<p>20mph zone.</p> <p>CPC also raise concerns on road geometry and do not agree with stating an average road width of 5.6m, without stating which length of road is being measured. Highlighting that the key dimension is the width at the pinch points, which occur in many places along the B1145 from the B1149 roundabout to Salle Beck bridges.</p> <p>CPC raise concerns regarding the base widths used for small hatch backs and SUVs suggesting that dimensions for these vehicles are greater than those used for the Norfolk Boreas assessment by up to 30cm and that the models used for the assessment do not reflect reality.</p>	<p>and Abnormal load traffic demand for HP3.</p> <ul style="list-style-type: none"> • Comments on Deadline 13 submissions [REP14-039] Section 1.1 contains responses on concerns over road space, HGV conflicts, communications, AILs, accidents, 20mph zones and access/egress onto the B1145. • Response to Open Floor Hearing 2 [REP13-014] and the Response to Open Floor Hearing 3 [REP13-015] responses to the additional traffic related requirements within the Norfolk Vanguard as made DCO; the revisions made to, and the application of, the Highway Intervention Scheme (HIS) across projects, and Cawston Alternatives including addressing suggestions that engagement has been disingenuous. • Position Statement on the meeting with Cawston Parish Council [REP13-019] responded to all the HIS matters raised by CPC. • Written Summary of the Applicant's Oral Case at Issue Specific Hearing 5 [REP13-016] catalogues the revisions to the HIS. • Comments on Deadline 10 submissions and other submissions [REP11-008] Section 1.2 contains responses on concerns over highway geometry, narrow footways, and other HIS concerns including wing mirror oversailing and on-street parking. • Comments on Deadline 6 submissions and other submissions [REP7-016] Section 1.2 contains responses to concerns over the revised scheme and the results of the RSA. • The Applicant's response to the ExA's third written questions [REP7-017] contains responses on questions raised on the suitability of the HIS, the results of the RSA, HGV delivery periods and cumulative traffic effects. <p>The HIS has evolved during the Norfolk Boreas examination and been subject to numerous revisions in response to stakeholder concerns and formal technical reviews. Having passed an independent road safety audit and received technical approval from NCC the scheme is considered finalised from an infrastructure intervention perspective. The Road Safety Audit undertaken on the HIS remains valid and does not require re-evaluation. The Department for Transport sets out the processes for authorising abnormal load movements according to dimensions and weight and directs a different procedure to that of the independent Road</p>

Summary of Submission	Applicant's Comments
	<p>Safety Audit process, which Hornsea Project Three will implement.</p> <p>The HIS has been subject to substantial (arguably unprecedented) level of review having been subject to the scrutiny of three examinations, numerous technical reviews, two independent Road Safety Audits and the NCC development control panel. Whilst the Applicant recognises the concerns of the community, it is important to reiterate the positive outcomes from the HIS evolution:</p> <ul style="list-style-type: none"> - Norfolk Boreas HGV peak traffic demand limited to 112 daily movements for a maximum week duration; - Hornsea Project Three HGV peak traffic limited to 127 daily movements for a maximum month duration; - Significantly reduced HGV demand for the duration of the Norfolk Boreas project impacting Cawston which is limited to a maximum 30 weeks (Scenario 1) and 48 weeks + 30 weeks (Scenario 2 Duct installation and cable pull respectively). - Significantly reduced HGV demand for the duration of the Hornsea Project Three project impacting Cawston which is limited to a maximum 11 months; - Prohibition of HGV deliveries during term time school pick up and drop off times (7:30am – 9:00am and 3:00pm – 4:00pm, Monday to Friday); - Prohibition of HGV deliveries from 6pm to 9am (in line with parking restrictions which will be in place Monday to Friday); - Improvement to Cawston CoE Primary School pedestrian routes; - Upgrades to CPC street lighting; - Independent Road Safety Audit passed; - Intensive 'real-time' camera monitoring of Cawston to quickly identify driver compliance issues and rectify; - A commitment to introduce further intervention measures (including incrementally reducing daily HGV demand) should a valid driver compliance issue be identified by the monitoring regime; and - A commitment from Norfolk Boreas, Norfolk Vanguard and Hornsea Project Three to implement the HIS and to co-ordinate HGV movements to avoid peak overlaps. An updated Hornsea Project Three CTMP securing the commitment to the HIS was submitted to the Secretary of State on the 30

Summary of Submission	Applicant's Comments
	<p>September 2020.</p> <p>The Applicant reaffirms a commitment to continue to engage with CPC and other relevant stakeholders to strive to achieve constructive, positive outcomes for all parties.</p>
<p>CPC raise concerns that the Applicant has not produced swept path diagrams for the accompanied Hornsea 3 Abnormal Loads with their 3.3-metre-wide load. CPC claim that should these be produced they would identify additional and extended potential two way HGV conflict areas. They also claim that should this be the case the extended HGV conflict areas, together with the impact of any convoy system operated by HP3 exacerbating the existing problem of "platooning" of HGV and other traffic, would render the core concept of the Highway Intervention Scheme even less feasible.</p>	<p>It is not the responsibility of Norfolk Boreas to provide swept path analysis for abnormal loads used by Hornsea Project Three. As stated above the HIS has passed an independent road safety audit and received technical approval from NCC. Therefore, for the purposes of this examination the scheme is considered finalised.</p> <p>Any additional information required regarding the transportation of Hornsea Project Three cable drum deliveries will need to be produced by Hornsea Project Three and will be agreed with and approved by Norfolk County Council as part of the development of the Hornsea Project Three final CTMP.</p>
<p>CPC highlight that there will be a construction period of 6 years from 2022 to 2028 which they do not consider to be temporary and that it is unlikely to be reversible. They also note that it does not take into account pre-construction activity and the proposed Equinor projects planned to start in 2024.</p> <p>CPC claim that <i>"the cumulative impacts of construction traffic of the many wind farm cable route projects are still not fully assessed. Even those impacts which the applicant acknowledges are not adequately or safely mitigated by their plans."</i></p>	<p>The Applicant does recognise that, as explained in the Applicant's responses to the ExA fifth round of written questions Q5.4.0.3 [REP14-036] under a worst case scenario, the total elapsed time of construction activities across all three projects would be over 6 years. HGVs associated with the Norfolk Vanguard and Norfolk Boreas projects could periodically travel through Cawston over a six year period. However as stated above due to the work done to significantly reduce HGV demand for the duration of the impacts through Cawston, under Scenario 1 (Norfolk Vanguard and Norfolk Boreas) the total combined period for HGV demand would be approximately 89 weeks (around 22 months) and under Scenario 2 approximately 78 weeks (around 19 months) For Hornsea Project Three further information on the duration of works in Cawston are provided in the recent Technical Note provided [REP14-043], identifies that the onshore construction works for Hornsea Project Three which require construction vehicles through Cawston will be over a total of up to 11 months in this area. Therefore, although the total cumulative elapsed period for the works is shown as 6 years, the duration of HGV demand within that period will be much less.</p> <p>Following completion of Norfolk Boreas construction no further construction traffic associated with the project would be required to travel through Cawston and therefore the impacts associated with Norfolk Boreas would no longer occur.</p> <p>Please refer to the Applicant's comments on response to ExA fifth written</p>

Summary of Submission	Applicant's Comments
	<p>questions Q5.4.0.1 [REP15-003] where is has responded previously on potential cumulative impacts including with Dudgeon and Sheringham Shoal extension project(s). A full Cumulative Impacts Assessment (CIA) has been undertaken, as part of the Environmental Impact Assessment, including potential cumulative traffic impacts as detailed in ES Chapter 24 Traffic and Transport [APP-237] and appropriate mitigation identified where required.</p> <p>The scope of which (in terms of relevant issues and projects) was agreed with all relevant stakeholders, prior to submission of the Application and in line with guidance identified all projects where reasonably well described and sufficiently advanced information was available in order to undertake a meaningful and robust cumulative assessment. The Scoping Report for the Dudgeon and Sheringham Shoal extension project(s) was not submitted until after the Norfolk Boreas Application and the information available for the project has not been refined since. As such the level of information available with respect to these project(s) is not sufficient to carry out a CIA. However, as is appropriate it will be incumbent upon the Dudgeon and Sheringham Shoal extension project(s) to undertake a full cumulative assessment of those projects in relation to Norfolk Boreas (and any other relevant projects) when sufficient information is available as part their EIA. This EIA will form part of the Dudgeon and Sheringham Shoal extension project(s) DCO Application.</p>

1.2 REP16-018 Colin King

Summary of Submission	Applicant's Comments
Visualisations	
<p>Firstly I agree with the applicant's explanation, that the ceiling of the blue dotted box is set at 25m and the converter halls' fronts are 19m, which gave me the impression that the halls' fronts were set on the site's back line. My mistake, and I apologise. I find it unclear that the applicant explains, " A 3D model of the onshore substation has been used to give an indication of what the substation will look like</p>	<p><i>"By showing the blue Rochdale envelope alone, we may overestimate the extents to which the development could be visible."</i></p> <p>The converter halls will be the most visually prominent component of the onshore substation. Largely relating to technical considerations, there is a commitment to</p>

Summary of Submission	Applicant's Comments
<p><i>and a blue dotted box represents the Rochdale envelope, within which the substation elements can move. By showing the blue Rochdale envelope alone, we may overestimate the extents to which the development could be visible. By showing just the substation model alone, we may underestimate visibility. Hence, the use of both techniques in the visualisations." (from comments on relevant representations page 153, table 24 no4,) And they also explain, "The visualisations show the worst case assumptions and further design iterations post consent will either maintain those levels and extent of visibility, or reduce them."</i></p>	<p>locate these converter halls in the northern part of the site, as secured through the zoning plans presented in the Design and Access Statement (DAS) Figures 9 and 10 [REP14-019]. This proposed layout is reflected in the EIA visualisations, with the computer model of the onshore substation showing the converter halls to be located in the northern part of the site. The Rochdale Envelope does not reflect this commitment and, therefore, could represent a situation in which the converter halls are located in the southern part of the site. This would overestimate the extent to which the development would be visible, as the location of the converter halls in the southern part of the site would make them more visible in views from Ivy Todd and Ivy Todd Road, but to locate them in the southern part is not an option being considered.</p> <p>The substation model is representative of the worst case, as it applies the maximum dimensions to the various components of the onshore substation. While changes to the layout could potentially increase the potential impacts, for example moving the converter halls further south, as described above, the commitment to keeping the converter halls in the northern part of the site, secured through the DAS, ensures this increase in impacts will not arise.</p>
Operational Noise	
<p>1. REP16-018 continues to raise concerns regarding operational noise and potential increases in background noise levels during operation.</p>	<p>As stated in the Applicant's Comments on Deadline 15 Submissions [AS-081] in response to REP15-006 Breckland Council required that noise limits were met under the cumulative position to ensure not increases in the noise levels, which has been secured within the DCO requirement.</p>
<p>2. Mr King questions why certain locations (wood farm and the west end of Bradenham) were not included in the baseline noise monitoring and why the Dudgeon noise limit was used.</p>	<p>As stated in the Applicant's Comments on Deadline 15 Submissions [AS-081] the methodology for undertaking the noise survey measurements within the Norfolk Boreas onshore project substation study area was agreed during pre-application consultation as part of the Evidence Plan Process through Expert Topic Group meetings with relevant stakeholders. The Local Planning Authority agreed that the methodology for determining and deriving background sound levels was appropriate.</p>
<p>3. REP16-018 raises the opinion that residential receptors sensitives should be variable dependent on their current background noise level exposure.</p>	<p>As stated in AS-081 all residential receptors were categorised as being of a medium sensitivity in accordance with industry guidance and the methodology agreed with the Local Planning Authority.</p>

1.3 REP16-020, Julian Pearson on behalf of Holme Hale Parish Council, Comments on Responses to Deadline 15 Submissions

Summary of Submission	Applicant's Comments
<p><u>Design Reviews</u></p> <p>By conducting both (the independent design review and a design review conducted in a local forum), the Independent Design Review lacks any emotional bias which might be reflected in the local stakeholder input, whilst the local stakeholders can highlight what most concerns them about proposed mitigation measures, or lack of them, in certain areas.</p> <p>History at the Necton substation site has shown, through the Dudgeon build, how a mitigation plan agreed only with the local councils has been unilaterally changed by the developer and mitigation significantly reduced - to virtually nil.</p>	<p>The Applicant has agreed a Design Review Process in the DAS updated at Deadline 14 [REP14-014] which includes the commitment to undertake the design review at an early stage, but at a time when there is sufficient detail regarding the substation design to allow that review to be conducted. Consultation responses have suggested local stakeholders prefer for the onshore project substation to be as discreet as physically possible. Conversely, the objectives of those undertaking an independent design review may not align with the preferences of the local stakeholders. To therefore ensure that the design review process is most appropriate for local stakeholders, the Applicant maintains that this should be conducted in a local forum only.</p> <p>The Applicant notes the concerns raised regarding the Dudgeon Offshore Wind Farm substation and would like to clarify that Vattenfall had no involvement with the approach taken regarding the substation mitigation for that project and are not affiliated with it.</p>
<p><u>The DAS, Horlock Rules and Design Guide</u></p> <p>REP16-020 requests specific additional points to be added to Table 4.2 of the Design and Access Statement (DAS) [REP14-014] regarding The Horlock Rules.</p> <p>REP16-020 also requests more detail added in the Design Guide including the approach and mitigation.</p>	<p>The Horlock Rules have been embedded into the design process from the beginning of the site selection process. Table 4.2 of the DAS [REP14-014] includes aspects of the Horlock Rules which can be applied to the onshore substation (relevant to design), because this specific table is included within Section 4.4 of the DAS which deals with 'Identification of Onshore Project Substation Location'.</p> <p>Therefore, all the items within Section 4.4 are focused on location only, and as a result the specific notes mentioned in REP16-020— with regard to colour, materials, fencing and building placement to screen switchgear - are not appropriate for inclusion within Section 4.4 of the DAS. Colour, materials, fencing and the layout of buildings for screening purposes have been included in Section 5.3 'Onshore Project Substation Design' and outlined in Appendix 3 Preliminary Design Report. These aspects will be considered as part of the design review process.</p> <p>Breckland Council has agreed with the Applicant to engage at an early stage when further detailed design information is available based on the most appropriate and best available technology. The Applicant has produced a Preliminary Design Report</p>

Summary of Submission	Applicant's Comments
	<p>at this stage based on currently available information which sets out both the design approach and secures the mitigation measures to be applied in respect of the onshore project substation.</p> <p>The design of the onshore project substation will continue to be developed post-consent and a detailed design will be submitted for approval in accordance with DCO Requirement 16 and any principles included within this DAS [REP14-014]. As detailed design is not yet available the Applicant does not find it appropriate to add any more detail to the DAS or Preliminary Design Report at this stage, but reiterates that mitigation measures detailed in both the DAS, which includes the Preliminary Design Report are secured.</p>

1.4 REP16-021 Lucy Sheringham Deadline 16 Submission

Summary of Submission	Applicant's Comments
<p>Since the Norfolk Vanguard application was awarded consent there has been an increase in traffic (cars and lorries) on her private driveway.</p>	<p>The Applicant can confirm that as Norfolk Boreas is currently under examination and has not reached construction phase the increase in traffic experienced is in no way related to the Norfolk Boreas project. From the 7th September 2020 some initial ground investigations work has been completed by National Grid in the land surrounding the existing National grid substation and 400 kV overhead line. These works were fully completed on the 29th September. From the 15th September 2020 some initial ground investigations by Norfolk Vanguard have begun in the land surrounding the proposed Norfolk Vanguard onshore project substation. However the Applicant is unaware of any vehicles associated with any of these works having any difficulties in finding and accessing the site via the correct site entrance. Therefore, the Applicant considers the increase in traffic experienced must be related to other activities not associated with Norfolk Vanguard or Norfolk Boreas.</p>
<p>The submission also highlights concerns regarding road safety and in particular the safety of the access point to both the existing National Grid Substation and that of the Norfolk Vanguard and proposed Norfolk Boreas onshore project substations.</p>	<p>The Applicant provided a response to these safety concerns at Deadline 10 in REP10-033. Please see that submission for further detail.</p>

Summary of Submission	Applicant's Comments
The points raised in this regard were also made within the submission (also made by Lucy Sheringham) at Deadline 9 [REP9-055].	

1.5 REP16-022 Marine Management Organisation (MMO) Comments on responses to Deadline 15

2. Please note that the MMO also responded to the ExA's request for further information. The Applicant's comments on these responses are provided in the Applicant's Comments on Responses to the Request for Further Information (document reference ExA.PDR.D17.V1) which has also been submitted at Deadline 17.

Summary of Submission	Applicant's Comments
Deadline 16 submissions	
<p>Applicants response to the MMO's response to Q5.16.0.5</p> <p>At Deadline 14 (REP14-058) the MMO asked the Applicant if it would be possible to update the Deemed Marine Licences (DMLs) to include a 6-month submission date for the following documents:</p> <ul style="list-style-type: none"> • Haisborough Hammond and Winterton (HHW) Special Area of Conservation (SAC) Site integrity Plan (SIP) • Southern North Sea (SNS) SAC SIP • Marine Mammal Mitigation Plan (MMMP)/Noise monitoring • Ornithology plan <p>The Applicant has agreed to update the DMLs to state a 6-month submission date prior to construction for the following documents:</p> <ul style="list-style-type: none"> • HHW SAC Site integrity Plan (SIP) • Southern North Sea (SNS) SAC SIP • MMMP/Noise monitoring 	<p>As stated in REP15-003 the Applicant is prepared to make the commitment, at the request of the MMO and with the support of Natural England, to providing the three agreed documents (MMMP, SNS SIP and the HHW SAC SIP) six months in advance of construction. These exceptions to the 4-month time frame applied to the other documents, have been made in acknowledgement that these are likely to be the most complex plans to discharge and therefore the most time consuming to agree. The Applicant considers that 4 months is a more suitable time frame for providing the remaining documents (except for the CSIMP which was already on a 6 month timeframe).</p> <p>As stated by the MMO, the Applicant is also cognisant that the SoS may wish to maintain consistency with the Norfolk Vanguard made DCO, reducing the timeframes for all documents to 4 months and as stated here the Applicant would also be content with this approach.</p> <p>The Statement of Common Ground (SoCG) with the MMO ([REP16-009] Table 7) contains a record on the evolution of both the MMO's and the Applicant's positions on this matter throughout the examination period.</p>

Summary of Submission	Applicant's Comments
<p>The MMO notes the Applicant advised that the timescale would not be updated for the Ornithology plan due to the nature of the Ornithology condition wording stage 1 of the Ornithological Monitoring Plan must be submitted at least four months prior to the first preconstruction survey. This plan is therefore on a different timeframe to the general approach of 4 (or 6) months prior to the intended commencement of licensed activities. The MMO is content with this approach but notes that it will recommend that the timescale for the submission of the ornithological monitoring plan at stage 2 of the condition should be 6 months.</p> <p>The Applicant also states that <i>'it is mindful that the SoS may wish to reverse the changes listed above to ensure consistency with the Norfolk Vanguard project and the Applicant would also be content if that were the case'</i>. While understanding the Applicant's position on consistency with the Norfolk Vanguard project, as stated in previous submissions (RR-069 and REP3-017), the MMO has consistently maintained the position that 6 months is a more appropriate timescale for the discharge of complex documents of this nature. As the Applicant has agreed to the MMO's request to update the DMLs to state a 6-month submission date for the documents listed in paragraph above the MMO would request that the SoS takes this fact into consideration when reaching a decision on this point.</p>	
<p>REP15-009: Natural England (NE) Deadline 15 Submission</p> <p>Decommissioning Development Consent Order (DCO) requirement</p> <p>NE provided potential wording for a condition within the DML – the MMO notes NE have amended their position further and have now agreed a condition with both the MMO and the Applicant should the SoS include a DML condition. This has been discussed in Section 3 below and therefore the MMO has no further comments on the proposed condition proposed by NE.</p>	<p>The SoCGs with the MMO [REP16-009] and Natural England [REP16-010] contain a record on the evolution of the parties positions on this matter throughout the examination period. In both instances this matter is discussed in the very last line of the SoCGs, the final agreed wording for a Condition or a Requirement is presented in full and these matters have all been resolved, therefore no further submissions are anticipated on this matter.</p>
<p>AS-081: Applicant's comments on Deadline 15 Submissions</p> <p>Applicants comments on the MMO's response to Q5.5.4.4 Decommissioning of cables in HHW SAC Conditions 20 and 3(1)(g): Confirm satisfaction or otherwise with change to the dDCO [REP13- 007/008] that includes a new cable</p>	

Summary of Submission	Applicant's Comments
<p>decommissioning condition 20 in Schedules 11 and 12 and removes condition 3(1)(g) prohibiting rock or gravel dumping.</p> <p>The MMO acknowledges the Applicant's comments and notes that discussions have continued which have included the points raised by the Applicant. The MMO, the Applicant and NE have now agreed a condition to be included in the DML if the SoS is minded to include a condition. Further comments can be found in Section 3 below.</p>	
<p>Update on the agreed mechanism for managing underwater noise in the Southern North Sea</p> <p>Southern North Sea Regulators Group</p> <p>The MMO attended a meeting with the Offshore Wind Industry, facilitated by Renewables UK, and provided an update and some potential draft guidance on the tool highlighted in REP13-035. The MMO advised the tool is not intended to be a method for scheduling noise activities by means of making a booking, but rather a tool which will assist in assessing the cumulative impacts across all offshore industry, and therefore allowing the MMO to make an informed decision as to whether the noise activity can continue at the time proposed.</p> <p>The MMO received initial comments from industry and is currently discussing these further with the Southern North Sea Regulators Group.</p> <p>The MMO highlighted the urgency for preparing guidance on the mechanism for all relevant industry and the group is working hard to prepare this as soon as possible.</p>	<p>The Applicant welcomes this update and is confident that the Regulators Group will provide the necessary tools and guidance to manage underwater noise impacts within the SNS SAC.</p>
Statement of Common Ground	
<p>The MMO and the Applicant have reached agreement on all the major issues raised during examination, the outstanding matters of disagreement are:</p> <ul style="list-style-type: none"> • The inclusion of wording within the Fisheries Liaison and Coexistence Plan to clarify that the MMO will not act as arbitrator in regard to compensation and will not be involved in discussions on the need for or amount compensation being issued; and • The inclusion of the HHW SAC SIP alternative for condition 9(1)(m). 	<p>The Applicant agrees with these statements provided by the MMO and can confirm that the SoCG was submitted at Deadline 16 and is REP16-009 in the Examination library.</p>

Summary of Submission	Applicant's Comments
<p>The MMO and the Applicant have agreed that discussions cannot move further forward on these matters during the remainder of Examination.</p> <p>Therefore, the Applicant will be submitting the final version of the Statement of Common Ground at Deadline 16. This has been approved by the MMO and reflects the MMO's final position.</p>	

1.6 REP16-023, Mulbarton Parish Council, Deadline 16 Submission

Summary of Submission	Applicant's Comments
<p>The submission of Mulbarton Parish Council covers a broad range of topics, from UK "Need for electricity", "Need for renewable energy", "Carbon footprint and climate change", "Transmission capacity" and more. A number of sources are quoted, some more recent than others. The conclusion reached by the author(s) of this paper is stated thus: "In our view, the potential benefits of the project, as it is currently formulated, are not sufficient to justify either the onshore, or the offshore impacts".</p>	<p>The Applicant notes the points made and opinions provided by the author(s) of this submission.</p> <p>The Applicant would direct Mulbarton Parish Council to read the information prepared by the Committee on Climate Change, the UK's independent government advisors on building a low-carbon economy and preparing for climate change. Through the Climate Change Act, the UK government has committed to reduce emissions by at least 100% of 1990 levels (Net Zero) by 2050. This commitment has been further underlined by the Prime Ministers recent public announcement that the UK government plans to make the UK a world leader in green energy and to power all UK homes using renewable energy from offshore windfarms by 2030¹.</p> <p>As a signatory to the <u>Paris Agreement</u>, the UK has committed to contribute to global emission reductions to limit global temperature rise to well below 2°C and to pursue efforts towards 1.5°C above pre-industrial levels. The Climate Change Act requires the UK government to set legally-binding 'carbon budgets' which act as stepping stones towards the 2050 target. A carbon budget is a cap on the amount of greenhouse gases emitted in the UK over a five-year period. Budgets must be set at least 12 years in advance to allow policy-makers, businesses and individuals enough time to prepare. The CCC advises on the appropriate level of each carbon budget. Once accepted by Government, the respective budgets are</p>

¹ https://www.gov.uk/government/news/new-plans-to-make-uk-world-leader-in-green-energy?utm_source=27887da9-2aa8-4ad7-a346-b8722cd88156&utm_medium=email&utm_campaign=govuk-notifications&utm_content=immediate

Summary of Submission	Applicant's Comments
	<p>legislated by Parliament. The budgets describe the cost-effective pathway to achieving the UK's long-term climate change objectives. They also take into account a range of other factors including scientific knowledge, technology, economic and social circumstances, amongst others.</p> <p>The first five carbon budgets have been put into law and run up to 2032. The UK is currently in the third carbon budget period (2018 to 2022). The UK is not currently on track to meet the fourth nor fifth Carbon Budgets. Extensive electrification, particularly of transport and heating, supported by a major expansion of renewable and other low-carbon power generation is a cornerstone of the UK's action plan to deliver on the Net Zero target, and while the author(s) of the Mulbarton PC submission may not feel a sense of urgency with respect to delivering rapid electrification of the UK and global energy system, in this respect at least, they are at odds with Government policy, with independent advice and with public opinion (as evidenced by for example BEIS own Public Attitudes Trackers - most recently surveyed in June 2020 and the first UK-wide citizens' assembly on climate change, which was commissioned by six House of Commons Select Committees, see report published in September 2020).</p> <p>Neither does the submission take into account local plans and policies, such as the Norfolk and Suffolk Local Industrial Strategy which seeks to position the region as the "UK's clean growth region". It focuses on three opportunity areas: clean energy, agri-food and ICT/digital creative. The strategy also recognises a number of underpinning sectors such as ports and logistics. The Local Industrial Strategy has been adopted by local partners. This strategy recognises the significance of the offshore wind sector in delivering a brighter, greener future for the region, and notes socio-economic benefits resulting from the multi-billion pound investments into the region as well as the thousands of direct and indirect jobs which will arise as a result of the growth of the offshore wind sector.</p> <p>While the submission of Mulbarton PC allude to onshore and offshore impacts associated with a number of advanced offshore wind projects, they take no account of the potential impacts of any of their alternative solutions, including for example, suggesting extensive cabling through the Wash – one of the most designated and highly protected habitats in the UK.</p>

Summary of Submission	Applicant's Comments
	<p>The Applicant respectfully suggests the author(s) of the submission in the future of the national electricity grid and infrastructure, participate in the current consultation which is part of the offshore coordination project convened by NGESO².</p>

1.7 REP16-024 -Natural England's cover letter

- Note that Natural England also responded to the ExA's Rule 17 request for further information at Deadline 16. The Applicant's comments on these responses are provided in Applicant's Comments on Responses to the Request for Further Information (document reference ExA.PDR.D17.V1) which has also been submitted at Deadline 17.

Summary of Submission	Applicant's Comments
<p>The ExA requested an update on the agreed mechanism for managing underwater noise in the Southern North Sea. Natural England can confirm that the SNCBs have now been invited to attend part of monthly or bimonthly meetings with the regulator's group. We continue to have dialogue with them over the newly established tracker to ensure it captures the range of activity over which regulators will need to work together to ensure the noise thresholds are not exceeded. We remain committed to reviewing the SNCB guidance to ensure it remains fit for purpose and takes account of best available evidence. However, until a mechanism which can control the in combination impacts is proposed and agreed it is not possible to remove our concerns. Therefore, Natural England's position remains unchanged.</p>	<p>The Applicant welcomes the progress that has been made by the Regulators Group and is confident that with the inclusion of Natural England they will provide the necessary tools and guidance to manage underwater noise impacts within the SNS SAC.</p>

² <https://www.nationalgrideso.com/future-energy/projects/offshore-coordination-project/get-involved>

1.8 REP16-025, NSAG, Comments on Responses to Deadline 15

Summary of Submission	Applicant's Comments
NSAG have raised concerns regarding the ability for fire to spread and the potential risk posed by smoke.	<p>The Applicant notes NSAG's concerns over smoke and the potential for fire to spread.</p> <p>The Applicant would like to reiterate that the design and operation of substations are regulated and controlled to the highest health and safety standards; and <u>operators are required to develop emergency response plans and crisis management procedures</u> as part of the process as detailed in the Applicant's Comments on Deadline 14 Submissions [AS-080]. Under these controls and regulations fire risk, and therefore the risk posed by both fire spread and smoke, are minimal.</p>

1.9 REP16-026, NSAG, Deadline 16 Submission

Summary of Submission	Applicant's Comments
NSAG question why transmission losses impacted site selection when losses are low.	The siting of the project has followed a site selection process, taking account of environmental, physical, technical, commercial and social considerations and opportunities, as well as engineering requirements. This has been undertaken with the aim of identifying sites that will be environmentally acceptable whilst also enabling, in the long-term, benefits of the lowest energy cost to be passed onto the consumer, as such transmission losses should be reduced wherever possible to make the process as efficient as possible.

1.10 REP16-028, Oulton Parish Council, Deadline 16 Submission

Summary of Submission	Applicant's Comments
<p>1 Cumulative effects of cable drum deliveries through Cawston</p> <p>Oulton Parish Council (OPC) raise a number of <i>"issues of traffic flows associated with cable drum deliveries which came to light as part of Orsted's examination for</i></p>	The Applicant notes OPC's Deadline 16 submission to the ExA utilises data extrapolated from the Hornsea Project Three examination for cable drum movements through Oulton to set out concerns in relation to Cawston cable drum movements. This is not a valid comparison as there are marked differences in

Summary of Submission	Applicant's Comments
<p><i>Hornsea Project 3 (HP3)</i>". The issues relate to HP3 abnormal loads including those carrying cable drums which OPC highlight would cause delays to normal traffic and represent a risk to public safety. OPC recognise that the evidence, which they have taken from the HP3 examination, relates to Oulton however they are providing this as they consider the same impacts will occur in Cawston.</p> <p>Oulton reiterate their position that HIS in its current form would not work.</p>	<p>highway character, baseline traffic demand, Norfolk Boreas and Hornsea Project Three traffic demand, working hours and mitigation strategies.</p> <p>The Applicant has comprehensively set out the position on abnormal loads at Cawston in the Applicant's comments on Deadline 15 Submissions [AS-081]. Subsequently, the Applicant has provided further clarification to CPC that Norfolk Boreas will not be generating any abnormal loads through Cawston and this commitment will be secured in an updated OTMP to be submitted at Deadline 18.</p> <p>Please also refer to the comments on Cawston Parish Council REP16-017 above regarding Hornsea Project Three cable drum deliveries and the HIS, which states that any additional traffic management measures which may need to be deployed by Hornsea Project Three during their cable drum deliveries will need to be agreed with Norfolk County Council and secured through the Hornsea Project Three final CTMP and are in addition to the HIS.</p> <p>The Applicant has previously responded on the issue of the validity of Oulton traffic data and this response is in the Deadline 3 Submission - Comments on responses to the ExA's Written Questions [REP3-003].</p>
<p>2 The Sheringham and Dudgeon Extension Project consultation process</p> <p>OPC reference the response made by Vattenfall to the consultation on the Dudgeon and Sheringham Extension Projects and raises concerns over potential cumulative impacts.</p>	<p>PINS Advice Note 17 (Cumulative Effects Assessment) states that cumulative <i>"assessment should be undertaken to an appropriate level of detail, commensurate with the information available at the time of assessment."</i> The Norfolk Boreas application was submitted in June 2019 and included a cumulative impact assessment of all other existing and proposed development known at the time of that application. A scoping opinion was sought by Equinor for the Dudgeon and Sheringham extension projects in October 2019, i.e. 4 months after submission of the Norfolk Boreas application. The scoping report produced by Equinor for the Dudgeon and Sheringham extension projects did not include any detail of potential construction traffic or the routes that this construction traffic may use. It is understood that the earliest this level of detail might be available would be as part of the Preliminary Environmental Information for those projects, which is currently expected to be available in spring 2021. Therefore it is incumbent upon subsequent projects (in this case Dudgeon and Sheringham Extension Projects) to consider the potential for cumulative impacts with existing and proposed development (in this case Norfolk Boreas) and these issues would then be</p>

Summary of Submission	Applicant's Comments
	<p>examined as part of the Dudgeon and Sheringham DCO process should those applications come forward.</p> <p>In responding to consultation on the Dudgeon and Sheringham Extension Projects, the Applicant was simply highlighting that Norfolk Vanguard and Norfolk Boreas have made various construction traffic commitments on both the B1145 and B1149, and that these future projects promoted by Equinor should be mindful of those commitments when undertaking their own assessments.</p>
<p>3(i) Cable Logistics Area</p> <p>OPC seeks clarification from both the ExA and the Applicant as to whether such leasing arrangements [as described in the Applicant's e-mail to Oulton PC of the 14th September 2020] are viewed by the planning process as private, in such a way that activities on these sites might be unregulated and uncontrolled by any of the safeguards within the relevant DCOs.</p>	<p>Out of courtesy, and in the interests of transparency, Vattenfall notified the Parish Council of the pre-construction activity for Norfolk Vanguard which they may observe, with occasional low level vehicular access to the site in question in an e-mail to Oulton PC of the 14th September 2020 (see Appendix 1).</p> <p>The applicant received a follow-up e-mail from Oulton PC on the morning of the 29th September, listing the questions noted in their submission. From their mail we inferred that they had not appreciated any material increase in traffic intensity as a result of our activities over the two weeks since the Applicant had begun to use the site in the manner described in the notification communication.</p> <p>On receiving the queries from Oulton PC, the Applicant immediately offered to discuss any concerns with representative(s) of Oulton PC directly. This offer was declined by Oulton PC. The Applicant responded to the questions the following morning , on September 30th see Appendix 2), explaining that the pre-construction works were for a short duration, and of a very low intensity that would not materially alter the levels of vehicles currently accessing the site, as well as again offering to discuss this directly with Oulton PC.</p>
<p>3(ii) The Old Railway Gatehouse</p> <p>OPC welcomes the continuing commitment to keep dialogue open with regard to the mitigations proposed for this property but notes that Vattenfall are still excluding acoustic barriers to the North of the property, as they consider this to be only relevant to Orsted's entrance to their Main Construction Compound.</p> <p>OPC disagrees with the Applicant's position on this matter and still maintains that cumulative traffic noise from all of the projects will be audible from the northern end (junction with The Street, Main Entrance to HP3 compound and Heydon Rd)</p>	<p>The Applicant is committed to continued, positive, open and direct dialogue with the residents of Old Railway Gatehouse throughout all stages of the Norfolk Boreas project. On the 31st July 2020 the Applicant visited the property to discuss the proposals made by the residents to the Examining Authority in response to the 4th round of Written Questions: Question 4.12.2.1 (c) (REP10-066). Since this visit the Applicant has now committed to provide acoustic glazing on all facades of Old Railway Gatehouse, as requested by the residents, and this is secured within the updated Outline Traffic Management Plan submitted at Deadline 14 (REP14 022).</p>

Summary of Submission	Applicant's Comments
<p>due to HGVs from all projects waiting to proceed along the southern end of The Street. Moreover it is also undeniable that, since all Vattenfall's traffic, as it has to proceed in a (roughly) north/south orientation past the property, will be bound to impact – at least on the roadside boundary – as much to the north of the property as to the south.</p> <p>OPC believes it to be ungenerous in the extreme for this Applicant not to provide an acoustic barrier on the roadside to the north, and then continue this for at least several metres along the northern boundary leading away from the road. This would not be excessive, and would only mirror the mitigation they have already agreed to provide on the southern boundaries of the property.</p>	<p>Based on discussions with Orsted Hornsea Project Three the Applicant also understands that Orsted is also willing to make this commitment.</p> <p>Noise modelling indicates that there would be no perceivable reduction in noise as a result of an acoustic barrier to the North at the property (either project alone or cumulatively with HP3).</p> <p>When visiting to discuss these matters the resident of the property indicated that the Northern acoustic barrier had been suggested primarily due to concerns related to the location of the entrance of the main Hornsea Project Three compound, which the Applicant understands to be one field away to the immediate north, both in relation to noise and potential visual impacts. As neither Norfolk Boreas nor Norfolk Vanguard are using this entrance or location there will no such impact from either project. The Applicant has passed on the concerns of the residents of Old Railway Gatehouse to Hornsea Project Three, but is unable to comment further on this matter.</p> <p>On this basis, the additional measures proposed by the Applicant are considered proportionate and are now adequately secured within the OTMP.</p>
<p>3 (iii) Outline Traffic Management Plan</p> <p>OPC requests clarification from the Applicant as to whether all the safeguards and commitments agreed by Norfolk Vanguard in relation to their proposed activities in Oulton have been carried over and secured in the DCO for Norfolk Boreas.</p>	<p>The Applicant's Deadline 13 Submission - Written Summary of the Applicant's Oral Case at Issue Specific Hearing 5 - Draft Development Consent Order and other matters [REP13-016] Section e) sets out the mechanisms for securing the same commitments for both Norfolk Vanguard and Norfolk Boreas OTMPs by means of DCO Requirement 21 for both the respective Projects.</p> <p>The Applicant can confirm that all the commitments secured through the Norfolk Vanguard OTMP have been secured in the Norfolk Boreas OTMP. Furthermore, as detailed the Applicant's comment on Deadline 15 Submissions [AS-081] Section 1.6, the Norfolk Boreas OTMP will be updated to reflect the commitment made during the Norfolk Vanguard examination with respect to no construction traffic being routed along Oulton Street. This will be captured in the updated OTMP to be submitted at Deadline 18.</p>

1.11 REP16-029, The RSPB, Deadline 16 Submission

Summary of Submission	Applicant's Comments
1. Introduction	This section relates to the R17 questions and therefore the Applicant has addressed this in a separate response (ExA.PDR.D17.V1).
2. Summary of the RSPB's Deadline 15 response regarding conclusions of Adverse Effects on Integrity	The Applicant provided a response to the RSPB's Deadline 15 submission in AS-081. Since this section of REP16-029 is a summary of the points made by the RSPB in REP15-013, the Applicant's response [AS-081] and references to other submissions therein remain valid. The Applicant does not consider it necessary or appropriate to repeat the content of those submissions here.
3. Summary of the RSPB's approach to identifying compensation measures and developing appropriate compensation packages	<p>This section of the RSPB's submission is a summary and reiteration of their Deadline 10 submission [REP10-067], to which the Applicant responded in REP12-001. The Applicant does not consider it necessary or appropriate to repeat the content of these submissions here. However, it should be noted that the RSPB also states that:</p> <p><i>'3.2 To date no new information has been provided by the Applicant to demonstrate that the compensation measures that they have identified meet the standards set out in Defra and European Commission guidance. Our comments on the compensation packages therefore remain as set out in our Deadline 10 submission (REP10-067).'</i></p> <p>As noted above, this is not accurate as the Applicant provided detailed responses to REP10-067 at Deadline 12 [REP12-001].</p> <p>The Applicant's previous response to these points notwithstanding, the Applicant, in consultation with Natural England, has further developed the compensation proposals and these are secured in the final dDCO (Schedule 19) to be submitted at Deadline 18. This is summarised in the Applicant's responses at Deadline 16 [REP16-003 and REP16-004].</p> <p>The RSPB has also suggested that derogation should be provided for gannet, guillemot and razorbill from the Flamborough and Filey Coast SPA. This question was raised previously by the ExA (WQ3.8.7.2) and answered by the Applicant in REP7-017.</p>

Summary of Submission	Applicant's Comments
	<p>The Applicant also considers that the Norfolk Vanguard Habitats Regulations Assessment³ is relevant in response to the RSPB's suggestion. With respect to in-combination impacts on gannet, razorbill and guillemot from the Flamborough and Filey Coast SPA, the Secretary of State (SoS) concluded that Adverse Effects on Integrity (AEoI) could be ruled out for all three species, both with and without the inclusion of Hornsea Project Three. Importantly, the in-combination assessment for Norfolk Vanguard on which the SoS's decisions were based included the predicted impacts for Norfolk Boreas. Therefore the magnitude of in-combination impacts assessed for Norfolk Boreas are aligned with those assessed for Norfolk Vanguard. Consequently the Applicant expects the SoS will reach the same conclusions of no AEoI for these species, and consequently there will be no requirement for compensation for these species.</p> <p>The RSPB concludes this section with the following statement:</p> <p><i>3.18 The RSPB's detailed comments on the proposed compensatory measures against the criteria set out in EC guidance can be found at Table 8 (kittiwake, artificial nesting structures) and Table 10 (lesser black-backed gull, predator-proof fencing) in REP10-067. They are relevant to our comments on the Deadline 15 submissions (see below) and bear close examination, as they demonstrate the dynamic interrelationship between the criteria. They highlight the issues which need to be addressed by decision-makers to assess properly the level of confidence that can be safely placed in any proposed compensation measures. It is unfortunate there has, to date, been no response by the Applicant to these legitimate and substantive concerns.</i></p> <p>This statement is incorrect. The Applicant provided a thorough response to these points in REP12-001.</p>
<p>4. The RSPB's comments on the Applicant's and Natural England's Deadline 15 comments</p> <p>a) Introduction</p>	<p>This section of the RSPB's submission includes a summary and reiteration of their Deadline 10 submission [REP10-067]. As noted in the previous row of this table, the Applicant provided responses to these points at Deadline 12 [REP12-001] and does not consider it necessary or appropriate to repeat the content of these submissions here.</p>

³ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010079/EN010079-004280-Norfolk%20Vanguard%20HRA.pdf>

Summary of Submission	Applicant's Comments
	<p>However, the above notwithstanding, the Applicant wishes to draw attention to the following statement from the RSPB:</p> <p><i>'4.2 We remain concerned that far too many details (scheme design, location, management requirements, tenure, consents etc) are proposed to be left to the post DCO consent period and create considerable risk that the appropriate measures will not ultimately be secured'.</i></p> <p>The Applicant has addressed this point through revisions to the DCO which now make it a condition that the compensation (if required by the SoS) must be agreed and provided prior to wind farm operation. The revised condition wording for both the Flamborough and Filey Coast SPA (as included in REP16-003) and the Alde-Ore Estuary SPA has been agreed with Natural England. The latter has been provided to the RSPB for comment following the Deadline 16 submission and prior to submission at Deadline 18. The Applicant believes that the revised condition wording for both SPAs will address some of the RSPB concerns.</p>
<p>b) Proposed compensation measures: lesser black-backed gull from the Alde-Ore Estuary SPA.</p> <p>The RSPB understands that the current compensation measures are to include:</p> <ul style="list-style-type: none"> • predator-proof fencing; and • a delivery co-ordinator to oversee delivery of the compensation and coordinate with landowners and other stakeholders. 	<p>In consultation with Natural England the condition securing the compensation for the Alde-Ores Estuary SPA in the dDCO has been widened to allow for 'predator management measures' and this is not restricted to locations within the SPA but can also include measures undertaken in nearby, linked habitats (Natural England has advised the Applicant about several locations outside the SPA where the proposed compensation measures could be delivered), such that the options referred to by the RSPB (and possibly others) can be explored post consent. The Applicant has agreed to amend the dDCO condition (Schedule 19) accordingly in the next version of the dDCO to be submitted at Deadline 18. Since the previous proposal to install a fence within the SPA has now been replaced with a more general proposal to manage predation levels, the Applicant considers this addresses (at least in part) the RSPB's comments in paragraphs 4.12 and 4.17 to 4.23.</p> <p>The Applicant would like to clarify that due to the extremely limited time available the Applicant's efforts have been concentrated in addressing the draft advice received from Natural England on the proposed compensation at the Alde-Ore Estuary SPA for Deadline 16. Following on from that the revised condition wording has been provided to the RSPB for comment, prior to submission at Deadline 18, and a meeting has been offered to the RSPB to discuss any comments that they</p>

Summary of Submission	Applicant's Comments
	<p>might have on the revised wording or the Addendum submitted at D16 [REP16-003].</p>
<p>c) Proposed compensation measures for kittiwake from the Flamborough and Filey Coast SPA</p>	<p>The Applicant has undertaken additional work in relation to compensation for kittiwake from the Flamborough and Filey Coast SPA [REP16-003]. This additional information, which has been consulted on with Natural England, has provided further evidence that artificial nesting structures are not 'unproven' as stated by the RSPB. This has been demonstrated through a review of existing onshore kittiwake colonies on artificial structures and consideration for how these could be extended. To this end, a 'letter of comfort' has been received from the Port of Lowestoft stating their willingness to support the Applicant in the provision of kittiwake compensation through these means, should it be required [REP16-003].</p> <p>Paragraph 4.39 of REP16-029 states:</p> <p><i>We note the Applicant accepts at Deadline 15 (REP15-003 – response to comments on Q5.8.6.2) that its scheme will act to reduce the SPA population from its current level.</i></p> <p>The Applicant has reviewed its response to this question (reproduced below) and can find no indication that this implies the acceptance of this effect as stated by the RSPB. In summary, the Applicant stated in REP15-003 that, if Natural England's methods (which the Applicant has repeatedly stated throughout the examination it considers to be highly precautionary) are applied to realistic estimates of the Flamborough and Filey Coast SPA population (i.e. treating the 1979 count of 83,700 as almost certainly a count of individuals, rather than pairs as is the normal unit of census) then the predicted impact level would not result in an adverse effect on integrity (AEoI). This in no way equates to the Applicant accepting Natural England's methods, but rather highlights that if the highly questionable 1979 count is replaced with a more realistic estimate of pairs (i.e. 41,850) then even when</p>

Summary of Submission	Applicant's Comments
	<p>assessed using Natural England's highly precautionary methods the conclusion would be of no AEoI. For the avoidance of doubt, the Applicant does not consider that this project will result in a reduction in the kittiwake population at the Flamborough and Filey Coast SPA either alone or in-combination (REP2-035).</p> <p>The following text is copied from REP15-003 (emphasis added):</p> <p><i>Kittiwake in-combination assessment. As set out in REP2-035 and REP5-051, the Applicant considers that Natural England has failed to fully take account for over precaution in the assessment (for example due to headroom, REP6-021). The Applicant is also aware of very compelling evidence, presented in Coulson (2011) that the conservation objective for this population (Restore the size of the breeding population at a level which is above 83,700 breeding pairs, whilst avoiding deterioration from its current level as indicated by the latest mean peak count or equivalent) is based on an erroneous count, conducted in 1979, which was almost certainly a count of individuals, not pairs (see Coulson 2011 pages 238-240 for a detailed consideration). Since the most recent population estimate is over 51,000 pairs, against a designated size of 44,520, this population context is highly relevant to the determination of AEoI. Natural England's precautionary interpretation of the PVA outputs, which suggests a reduction of 13.7% in the population size, would reduce the current population of 51,000 to 44,000 over the 30 year lifetime of the wind farm. This would clearly mean that, even when applying Natural England's precautionary approaches, the population would still be very close to its designated size at the end of the wind farm's projected lifespan, and on this basis an AEoI could be ruled out.</i></p>

1.12 REP16-031 The Wildlife Trusts Deadline 16 submission

4. Detailed responses to The Wildlife Trusts' (TWT) comments are provided in the table below however the Applicant has a number of overarching points, set out below, which should be considered before reading the detailed responses.
5. The submission made by TWT at Deadline 16 appears to be directed more generally at offshore wind farm projects which interact with SACs designated for benthic features as opposed to the Norfolk Boreas project specifically. TWT's submission and engagement on this

point has also come at a very late stage in the Norfolk Boreas examination. That may be one reason why the specific design and mitigation of the Norfolk Boreas project does not appear to have been taken into account by TWT in their submission made. In particular:

- An entire section (section 1.1. of Appendix B) is dedicated to making the case that rock protection should not be used within the HHW SAC. This is not relevant to the Norfolk Boreas project given the commitment made by the Applicant to not place rock (or gravel) protection within the HHW SAC as secured by Condition 3(1)(g) of the Norfolk Boreas Transmission DMLs.
- The submission made by TWT is similar in many respects to the recent letter (dated 19 August 2020) submitted by Leigh Day on behalf of TWT to the SoS in respect of Hornsea Project Three. Therefore the submission does not take into account that impacts associated with the Norfolk Boreas project are on a much smaller scale than Hornsea Project Three (the temporary area of impact for Norfolk Boreas is approximately 1/3 of that of Hornsea Project Three and the area of habitat loss due to cable protection is approximately 1/25 of that of Hornsea Project Three; further detail is provided in the Table below). TWT, in their submission to the SoS on Hornsea Project Three, does identify steps taken by Norfolk Vanguard (which are also taken by Norfolk Boreas) as an example of good practice in how to reduce the impacts of cable installation, however this mitigation has not been recognised or acknowledged in TWTs submission to the Norfolk Boreas Examination as a positive action taken by the project to mitigate impacts, despite the fact that all commitments made by the Norfolk Vanguard are also made directly by Norfolk Boreas
- In addition, the TWT submission does not take account of the significant work which the Applicant has undertaken, following full and positive engagement with Natural England and the MMO to minimise potential impacts on the HHW SAC as far as is possible. TWT have referred to and quoted Natural England's positions prior to significant commitments being made by the Applicant to numerous mitigation measures all of which have been welcomed by Natural England and in the opinion of Natural England "*significantly reduce the risk of AEoI*" to the HHW SAC [REP16-010]. Furthermore, TWT use quotes from Natural England's submissions out of context and without having regard to subsequent submissions by Natural England. For example they have responded in detail to confirm support for Natural England's comments made in REP14-067 which Natural England later clarified in REP15-009 were based on "*an industry wide position*" which was not specific to Norfolk Boreas. Natural England's REP15-009 goes on to state that with the mitigation proposed by the Applicant (and secured through Condition

3(1)(g) of the Transmission DMLs) *“the risk of an adverse effect on integrity (AEoI) has been reduced”*. TWT were perhaps not aware of this clarification made by Natural England.

6. TWT has had every opportunity over the last four years to engage on benthic and HRA issues and to raise the concerns stated in REP16-031; however, these have only now been raised, less than two weeks before the close of examination. It is perhaps because of this lack of engagement on benthic related issues (despite the Applicant providing TWT every opportunity to do so including invites to benthic ecology expert topic group meetings which were declined) that TWT does not appear to be aware of the significant work that the Applicant has undertaken to mitigate impacts in order to avoid AEoI to the HHW SAC. To introduce the concerns that TWT have into the examination at such a late stage does not allow the Applicant the time to engage further with TWT on these issues and limits the opportunity for these to be addressed (to the extent relevant).
7. The Applicant has recently (May 2020) agreed a Memorandum of Understanding (MoU) with TWT which Vattenfall Wind Power entered into in good faith and in the spirit of cooperation. The MoU advocates the use of open and regular engagement between the two parties. The submission made by TWT at Deadline 16 was made without any prior notice or communication with the Applicant and therefore is in direct contravention of the intention of the MoU.

Summary of Submission	Applicant’s Comments
Impacts from cabling activities from Norfolk Boreas offshore wind farm on Haisborough, Hammond and Winterton SAC	
<p><i>“1. The Wildlife Trusts (TWT) is entering this representation to state that we cannot conclude no adverse effect from cabling activities on Haisborough, Hammond and Winterton SAC. We recognise that we have not engaged on the impacts of cabling from Norfolk Boreas, but due to our strong disagreement for the decision for Norfolk Vanguard and the minded to approve letter for Hornsea Three, TWT will now be engaging on all offshore wind farms which have an impact on benthic features within Marine Protected Areas from cabling activities.”</i></p>	<p>The Wildlife Trusts (TWT) has had numerous opportunities to engage on the issue of cabling activities for the Norfolk Boreas project over the last four years therefore with less than two weeks remaining of the Examination there is very limited opportunity for the Applicant to engage with TWT to address their concerns many of which have been progressed with Natural England as the primary Statutory Nature Conservation Advisor, through regular and positive engagement.</p> <p>TWT were invited to attend the Norfolk Boreas Benthic Ecology Expert Topic group which was set up in early 2017 as part of the Evidence Plan Process (See the Consultation Report [APP 027]) and as far back as March 2016 the Norfolk Boreas and Norfolk Vanguard projects were presented to TWT at which point it was made clear that there was potential for cables to be routed through the HHW SAC. In</p>

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2017 a Benthic Ecology Method Statement was presented to TWT which provided detail of how the impacts of cable installation would be assessed within the EIA and information to support HRA. Meetings of the Benthic Ecology Expert Topic group were held in 2017, 2018 and 2019 which included the provision of HRA documents some of which specifically dealt with the issue of cable installation within the Haisborough Hammond and Winterton (HHW) Special Area of Conservation (SAC) (further information can be found within the Consultation Report [APP 027]). The final Benthic Ecology Expert topic group meeting was held on the 21st February 2019, to specifically discuss HRA issues within the HHW SAC. TWT declined the invitation to attend this meeting (Minutes are provided as Appendix 28.1 of the consultation report [APP 027]). Furthermore, in March 2019 a draft copy of the Information to Support HRA was sent to TWT for review. During the Norfolk Boreas Examination, Vattenfall invested significant time and effort agreeing the SoCG with TWT and agreeing a Memorandum of Understanding which was undertaken in good faith and with the understanding that all issues and concerns which TWT had with the project had at that point been raised.

At no stage during any of these processes did TWT raise any concerns regarding cable installation within the HHW SAC. Due to the fact that TWT only first raised this issue in their high level submission at Deadline 9 [REP9-053], to which the Applicant provided a robust response in section 1.21 of the Applicant's Comments on Deadline 9 Submissions and Other Submissions [REP10-033], Benthic Ecology was not even included in the SoCG which was signed and agreed at Deadline 9 [REP9-030]. At that stage (prior to Deadline 9) TWT did not express any concerns with cable installation. In addition, the matters now raised were not raised as an issue at Deadline 9, notwithstanding that at Deadline 9 REP9-053 was submitted by TWT on the specific subject of 'Article 6(4) and cabling impacts'. Given that a specific response was made by TWT on 'Article 6(4) and cabling impacts' at Deadline 9, it is unclear to the Applicant why TWT has waited until Deadline 16 to raise these additional points. Indeed, at Deadline 10 which was expected to be the last deadline prior to the close of examination, TWT stated, *"I am writing to confirm that the Statement of Common Ground between The Wildlife Trusts (TWT) and Norfolk Boreas is an accurate reflection of the position of TWT. In addition, I can confirm that TWT and Vattenfall have now finalised the Memorandum of Understanding."* [REP10-071].

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<p>"2. HRA for cabling impacts on Haisborough, Hammond and Winterton (HHW) SAC</p> <p><i>The Secretary of State cannot draw a conclusion of no adverse effect on Haisborough, Hammond and Winterton SAC unless:</i></p> <p><i>a) The conservation objectives and recovery of the Site will not be hindered during the lifetime of the project from cabling activities, including cable protection</i></p> <p><i>b) Evidence is available to support that decommissioning of cable protection is possible</i></p> <p><i>c) Evidence is available to show that the site will recover following decommissioning of cable protection"</i></p>	<p>a) The Applicant understands that these comments are directed at the SoS however the Applicant has provided within its Information to Support HRA report [APP-201] and supplementary submissions [REP5-057, REP6-016, REP10-043, REP14-031 and REP14-033] a robust assessment of effects of cable installation and cable protection on the HHW SAC and has concluded that these activities will not hinder the conservation objectives of the HHW SAC site. Further to this the Applicant has committed to significant mitigation measures as outlined in Table 4.2 of REP14-031 which will significantly further reduce the risk of any effects of cable installation. This is recognised by Natural England within the SoCG [REP16-010].</p> <p>b) The Applicant has provided evidence within REP6-018 (Cable Protection Decommissioning Evidence) of a number of options for cable protection which would be suitable for decommissioning. This along with Condition 3(1)(g) of the DCO which prevents the Applicant from placing rock or gravel protection within the HHW SAC, where cables cannot be buried due to ground conditions, ensures that impacts of habitat loss are not permanent. Natural England support this commitment as demonstrated in the SoCG [REP16-010] and accept that, as a result of this commitment, impacts associated with habitat loss are not permanent.</p> <p>c) Although there is no site specific evidence of recovery following the removal of cable protection from sandbanks (due to the fact that decommissioning of the types of cable protection which will be used on the Norfolk Boreas project has not occurred yet) there is a considerable weight of evidence from other industries to demonstrate that recovery would occur following the removal of infrastructure. The Applicant provides an extensive list of examples to support this position in response to R17.1.24 within REP13-013.</p>
<p><i>"We have provided detailed points in Appendix A on what must be included in the HRA when the Secretary of State makes his decision. This includes:</i></p> <ul style="list-style-type: none"> • <i>The consideration of all available evidence, especially that provided by the Statutory Nature Conservation Body.</i> • <i>The acceptance that cable protection is permanent for the lifetime of the project.</i> • <i>An assessment against all conservation objectives for Haisborough, Hammond and Winterton SAC, not just extent.</i> 	<p>The Applicant has the following comments to make in response to the points raised by TWT:</p> <ul style="list-style-type: none"> • The Applicant agrees that all available evidence should be considered, however it should be weighted according to its nature and relevance to the specific issues concerned. • Considering cable protection as a permanent impact would be a divergence from Natural England's (the SNCB's) position on this matter. As stated in the SoCG "Natural England agree that the impacts due to cable protection

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<ul style="list-style-type: none"> • <i>Recognition that the Site is in unfavourable condition. An assessment must be made on if cabling activities will cause further decline and impede recovery of the site during the lifetime of the project.</i> • <i>Avoiding over-reliance on previous decisions: Experience in recent years shows a much larger degree of uncertainty with regards to recovery of habitats from cabling activities and increasing evidence is available on the negative impacts from cabling.</i> • <i>The inclusion of commercial fishing in the in-combination assessment."</i> 	<p>would be a lasting impact, but if successfully decommissioned would no longer be a permanent impact". Natural England have agreed that with Condition 3(1)(g) and the Applicant's commitments made in the HHW SAC control document the decommissioning of cable protection has been secured (noting they also advocate the inclusion of Condition 20 for further reassurance).</p> <ul style="list-style-type: none"> • In the Applicant's Information to support HRA report and supplementary submissions [REP5-057, REP6-016, REP10-043, REP14-031 and REP14-033], the Applicant provides all the necessary information to undertake an assessment against all of the conservation objectives of the HHW SAC. • The Applicant's Information to Support HRA report and supplementary submissions [REP5-057, REP6-016, REP10-043, REP14-031 and REP14-033] do take account of the most recent site condition assessments. • The Applicant's Information to support HRA and supplementary submissions [REP5-057, REP6-016, REP10-043, REP14-031 and REP14-033] do not rely on previous decisions for its conclusion of no AEoI. However, the Applicant does consider that the most recent decision for Norfolk Vanguard, which has included Norfolk Boreas in its in-combination assessment, is highly relevant and must be taken into account as explained in [REP13-025]. • The Applicant has taken commercial fishing into consideration when establishing the baseline environment. Commercial fishing has shaped the current benthic habitats within the HHW SAC site. There is currently very limited fishing within the site as demonstrated in the Applicant's HHW SAC position paper REP5-057 and as there are numerous proposals to restrict fishing activity further within the HHW SAC any inclusion in a cumulative impact assessment would have little or no effect.
<p><i>TWT suggests that further discussions are required on compensation for the HHW SAC before a decision is made. All alternatives and compensations options have not yet been exhausted. Detailed comments can be found in Appendix B.</i></p>	<p>The Applicant has worked with Natural England and the MMO to consider and develop all realistic compensatory measures should these be required. This statement and Appendix B is in contradiction to the position taken by Natural England which is that <i>"With regards to the HHW SAC compensatory package Natural England can confirm we are content with the package that has been presented."</i> [REP15-009].</p>

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<p><i>"Pre-construction checks and balances</i></p> <p><i>We recommend the inclusion of a condition on the face of the Development Consent Order or as a deemed marine licence condition to review the original findings of the HRA for Haisborough, Hammond and Winterton SAC before construction commences. This is for the following reasons:</i></p> <ul style="list-style-type: none"> <i>• The project will be refined and therefore a check must be made to ensure the worst-case scenario assessed at the time of application still stands.</i> <i>• New site condition information will be available. Many Marine Protected Areas are declining in condition, and this sort of information must be taken into account before project construction commences.</i> <i>• There may be new in-combination impact factors which may need to be taken into account.</i> <p><i>This approach will ensure that the appropriate monitoring, mitigation and compensation measures are in place to ensure that the conservation objectives for sites are met. We emphasise that this condition must not allow the deferring of the HRA conclusions, mitigation, monitoring and any derogation measures until the pre-construction phase."</i></p>	<p>Construction cannot commence until the HHW SAC control document (document reference 8.20) has been approved by the MMO in consultation with Natural England. This document has within it, commitments to take account of the final design which must be within the worst case scenario assessed within the EIA, the current condition of the HHW SAC and any in-combination factors. Also, the document will include details of all appropriate mitigation and monitoring in accordance with the Outline HHW SAC control document.</p> <p>The Applicant has proposed two alternative conditions to secure the HHW SAC control document, one of which requires the MMO to be satisfied that the plan provides such mitigation as is necessary to avoid AEoI on the HHW SAC. The Applicant considers that this deals with TWT's concern and, as has previously been explained by the Applicant, this condition does not defer considerations of AEoI.</p> <p>The Applicant questions whether TWT has taken these matters into account when preparing its submission.</p> <p>Following discussion with the MMO the Applicant understands that the MMO will not be recommending any change to the DMLs as a result of the TWTs submission at Deadline 16. The Applicant is in agreement with this position and also does not consider that any changes should be made to the face of the DCO.</p>
<p>TWT refers to the following previous responses:</p> <ul style="list-style-type: none"> <i>• TWT response to Request for Further Information dated 10th September 2020</i> <i>• REP15-009: Natural England response to 5th questions</i> <i>• REP14-067: Comments on Natural England's response to Deadline 14: Review of the Norfolk Vanguard and Hornsea Project Three decision in relation to the Boreas examination advice on HRA benthic considerations"</i> 	<p>The Applicant has responded to:</p> <ul style="list-style-type: none"> <i>• TWT's response to Request for Further Information in the Applicant's comments on Responses to the Request for further Information (document reference ExA.PDR.D17.V1 which has also been submitted at Deadline 17)</i> <i>• REP15-009 in the Applicant's Comments on Deadline 15 Submissions [AS-009]; and</i> <i>• REP14-067 in section 1.4 of the Applicant's Comments on Deadline 14 Submissions [REP15-004].</i> <p>It should be noted that at Deadline 15 Natural England clarified that <i>"this [REP14-067] is an industry wide position regarding all forms of cable protection and that "Based on the evidence presented [by the Applicant to the Norfolk Boreas examination] we agree that this type of cable protection has the greatest likelihood of successfully being decommissioned and therefore cable protection over sub-optimally buried cables for the Boreas project was not considered to be a permanent</i></p>

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	<p>impact. This mitigation is secured through the now amended Deemed Marine Licence Condition 3(1)(g). This advice remains in place for the Boreas application and therefore with this mitigation in place the risk of an adverse effect on integrity (AEoI) has been reduced.”</p>
<p>Appendix A Habitats Regulations Considerations for cabling impacts on Haisborough, Hammond and Winterton SAC</p>	
<p>Available evidence</p> <p>TWT Highlight that evidence provided by Natural England needs to be considered in the decision making process and that considerable weight needs to be given to this evidence. TWT have quoted from Natural England’s Offshore wind cabling: ten years’ experience and recommendations document, dated July 2018 to highlight uncertainty that there will be recovery from:</p> <ul style="list-style-type: none"> • Cable installation (quoting that “cable installation taking place in less robust areas of sediment where the prospect of recovery is less certain); • Maintenance activity (stating that cabling should no longer be considered a one-off activity); • Additional rock protection is often required. 	<p>It should be noted that TWT are quoting from Natural England’s generic advice on cabling and not specific advice which is related to the site specific circumstances and the level of mitigation provided by the Norfolk Boreas project. Natural England recognise (within their RR-099 and within the SoCG [REP16-010]) that “the mobile nature of this particular sandbank system would make it more likely to recover from changes in structure than less mobile ones”. Therefore, it can be considered a more robust area.</p> <p>To further ensure that recovery does take place the Applicant has committed to numerous mitigation measures, greatly exceeding the level of mitigation required for those projects which have informed Natural England’s Offshore wind cabling: ten years’ experience and recommendations document. These measures which are secured within the HHW SAC control documents (document reference 8.20, REP14-031 and REP14-033) include (but are not limited to):</p> <ul style="list-style-type: none"> • Committing to a HVDC technology which reduces the maximum number of cables from 6 to 2; • disposing of any sediment as close as possible to where it has been removed from; • disposing of sediment up drift of where it was removed from so that it is naturally replaced to its original location; • disposing of material using a fall pipe, to ensure the accuracy of the sediments destination; • Avoiding placing cable protection in priority areas of Annex I <i>S.spinulosa</i> reef; and • Reducing cable protection both for unburied cables and reducing cable crossings. <p>In response to the concerns over maintenance activities, the Information to support HRA report [APP-201] does consider the likely maintenance and reburial activities in</p>

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	<p>the worst case scenario. These maximum worst case scenarios are based on Vattenfall Wind Power Limited's experience at other wind farm sites and also have a large contingency factor built in. Therefore, this has been accounted for within the assessment. Based on studies of the ground conditions within the Norfolk Boreas offshore cable corridor (such as the ABPmer Sandwave Study [APP-206] and the Cable Installation Study [APP-548]) and advances in cable design and installation techniques, the Applicant is confident however, that if it is permitted to use the pre-sweeping technique advocated within the application, little or no maintenance or reburial activities would be required throughout the life of the project.</p> <p>Due to concerns over the placement of <u>rock protection</u> highlighted in the final bullet point the Applicant at Deadline 10 committed to not using <u>rock</u> or gravel protection to protect cables in the HHW SAC (excluding at crossing points). This ensures that any additional cable protection placed would be in the form of less intrusive matting or of a similar product. Furthermore, as defined in document 8.11 Outline Offshore Operations and Maintenance Plan [REP5-029] any additional cable protection placed during operations would be subject to a separate marine licence and therefore could only be carried out in such a way as not to cause AEoI to the HHW SAC (unless a derogation case and compensation was secured).</p>
<p>Available evidence (continued)</p> <p>TWT quote from generic advice provided by JNCC and Natural England on the key sensitivities of the HHW SAC and highlight that it is currently in unfavourable condition.</p> <p>TWT follow these quotes with a conclusion that <i>"this <u>evidence</u> increases the <u>scientific doubt</u> as to the recovery of habitats from cabling activities, which must be taken into account in the HRA. It must also be taken into account that a lack of evidence exists on if cable protection can be decommissioned and if habitats will recover following decommissioning. If there is a lack of certainty that either decommissioning is not possible or that habitats will recover, then a conclusion of adverse effect must be drawn"</i> (the underlining emphasis has been added by the Applicant).</p>	<p>The key sensitivities highlighted in the Natural England document for the HHW SAC have been considered within the Information to Support HRA [APP-201] and supplementary submissions [REP5-057, REP6-016, REP10-043, REP14-031 and REP14-033]. It is noted that this specific document was published in September 2019, after the Application was submitted, however the Applicant was aware of Natural England's position on the key sensitivities through engagement with Natural England during the evidence plan process.</p> <p>The Natural England Key Sensitivities document should not be referred to as evidence to support TWTs claim that recovery is unlikely to occur as there are no specific case or scientific studies referenced within that document. Quoting Natural England's advice is not the same as providing fact-based evidence derived from scientific studies or cases. The Key Sensitivities document highlighting cable installation as a key pressure on the HHW SAC was published in September 2019 and coincided with the start of the Norfolk Boreas examination, so would have</p>

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	<p>been expected to include reference to the cabling activities proposed for Norfolk Vanguard and Norfolk Boreas which were in the public domain and well known to Natural England at that point in time. The Applicant worked with Natural England and the MMO throughout the examination to commit to further mitigation measures reducing the effects of the project on the HHW SAC in line with NE's advice in the Key Sensitivities document. These measures have been welcomed by Natural England and it has been recognised (within the SoCG [REP16-010]) that these measures <i>"significantly reduce the risks of AEoI to the HHW SAC"</i>.</p> <p>It should also be noted that whilst the Applicant has provided an extensive list of examples to support its position that recovery would occur (these are summarised in the Applicant response to R17.1.24 within REP13-013) there has been very little direct evidence provided by Natural England or TWT that recovery would not occur in Sandbank habitats.</p>
<p>Temporary impacts</p> <p>TWT express their position that the placement of cable protection must be considered a permanent impact. They highlight that rock protection cannot be decommissioned, this is especially true at crossing points and therefore there will always be an effect. They also highlight that the site condition must be taken into consideration and that a small impact cannot be considered de-minimis. Furthermore, they warn about comparisons with Dogger Bank as that decision was made in 2015 and further information is now available.</p>	<p>To address TWTs concern that rock protection cannot be decommissioned the Applicant refers to Condition 3(1)(g) of the Transmission DMLs:</p> <p><i>"in the Haisborough, Hammond and Winterton Special Area of Conservation, cable protection must not take the form of rock or gravel dumping where it is deployed to protect export cables apart from at cable crossing locations with existing cables and pipelines."</i></p> <p>With the inclusion of Condition 3(1)(g) at Deadline 10 the Applicant considers that it has addressed TWT's concern on this issue.</p> <p>Furthermore, due to work undertaken by the Applicant in completing agreements with disused cable owners, the Applicant has reduced the number of cable crossings within the HHW SAC from six down to two. Furthermore, the Applicant has agreed with Natural England that as there is already existing infrastructure at these locations, these do not represent Annex I habitat as they are not of "natural" substrate. Therefore, by constructing these two cable crossings the Applicant would not be hindering the conservation objectives of the site.</p> <p>A significant amount of work has been undertaken in consultation with Natural England and the MMO to reduce the worst case scenario maximum area occupied by cable protection and it is now just 0.024km² (0.004 of which is at crossing points</p>

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	<p>and therefore does not affect Annex I habitat). To put this in context, it equates to approximately 1/25th of the worst case area of cable protection that Hornsea Project Three is seeking to consent within the North Norfolk Sandbanks and Saturn Reef SAC.</p> <p>The Applicant has followed Natural England's advice on assessing small-scale habitat loss [REP1-057] when assessing the potential effects of cable protection and has reached the conclusion of no AEoI [REP10-043]. The Natural England advice allows for the fact that, if the scale of habitat loss can be shown to be "<i>de minimis</i>", then Natural England could rule out AEoI.</p> <p>The conclusion reached by the Applicant of no AEoI within the Information to Support HRA and supplementary submissions [REP5-057, REP6-016, REP10-043, REP14-031 and REP14-033] does not rely on previous decisions and does not rely on the Dogger Bank project in any way.</p> <p>The Applicant also notes that the SoS does not rely on Dogger Bank in concluding no AEoI for the Norfolk Vanguard project (Norfolk Vanguard HRA⁴), which includes Norfolk Boreas within its in-combination effects assessment. The Applicant assumes that this comment has been made by TWT in relation to Hornsea Project Three where the SoS has referred to Dogger Bank in support of the conclusion of no AEoI for that project. Therefore, this comment has no relevance to the Norfolk Boreas project.</p>
<p>TWT state that fishing should be included in in-combination assessments</p>	<p>The Applicant has addressed the issue of including fishing in the in-combination assessment, raised by TWT in their relevant representation, in the Applicant's Comments on Relevant Representations [AS-024] Table 7 row 5. This was previously raised in relation the assessments of impacts to marine mammals and has only now been raised in the context of benthic ecology, however the same principle applies, that the existence of fishing has been included as part of the baseline. Furthermore, the methodology used for the HRA assessment was agreed with stakeholders through the evidence plan process and the draft information to support HRA was sent to TWT for comment and these concerns were not raised.</p>

⁴ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010079/EN010079-004280-Norfolk%20Vanguard%20HRA.pdf>

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	<p>Fishing, particularly historic beam trawling, has undoubtedly played a major part in shaping the habitat now found within the HHW SAC. However, the current level of fishing now experienced within the HHW SAC is very low (see REP5-057 for further information) and if new fisheries restrictions are successfully imposed these will ensure that it remains very low. Therefore, even if fishing were to be artificially added to the in-combination assessment for the HHW SAC it would have no effect on the outcome of that assessment.</p>
Appendix B: TWT comments on proposed compensation measures for cabling impacts on Haisborough, Hammond and Winterton SAC	
<p>1. Alternatives</p> <p>TWT do not consider that all alternatives have been considered for cabling and cable protection citing that there should be <u>no rock protection in Marine Protected Areas (MPAs)</u> and suggesting an alternative of leaving the cables exposed on the surface and designating an exclusion zone. TWT concludes this section with <i>"TWT has identified <u>feasible alternatives</u> which require further analysis against the MPA in question as outlined in European Commission guidance. We encourage this applicant and all offshore wind farm developers, who have extensive resources and skilled engineers, to develop alternative solutions and invest in the gathering of data to give better certainty that there will be minimal impacts on the marine environment from offshore wind farm development. Developers cannot continue to deliver projects in <u>the way which they have over the past 20 years if the UK network of MPAs is to be maintained.</u>"</i> (the underlining emphasis has been added by the Applicant).</p>	<p>The Applicant considers that this appendix, in particular, is ill informed and has given little or no consideration for the Norfolk Boreas project or the progress which has been made during the Norfolk Boreas examination. The Appendix is incorrectly named as it considers what mitigation measures should have been considered and not as the title states "compensation measures".</p> <p>If TWT had been engaged fully in the Norfolk Boreas examination, it would be cognisant that the Applicant has made the commitment to not place rock protection within the HHW SAC (as made in the HHW SAC control documents and secured within Condition 3(1)(g) of the Transmission DMLs at Deadline 10). Therefore, the majority of this appendix is completely irrelevant to the Norfolk Boreas project.</p> <p>In response to the alternatives that TWT state they have identified, the Applicant wishes to clarify that, at the suggestion of Natural England the Applicant did consider the designation of exclusion zones and protection of cables using marker buoys [AS-024], however this was ruled out at an early stage. Whilst this type of protection may work at smaller nearshore wind farms it would not be possible to designate and enforce such a closure over a large offshore area with water depths of up to 40ms. Even if an exclusion zone was legally designated there would be no guarantee that this would prevent vessels from entering the area. Therefore, it would not be possible to ensure the integrity of the cables using this method nor would it be possible to ensure the safety of other sea users, particularly fishermen who use bottom towed fishing gear.</p>

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	<p>In conclusion the Applicant has assessed all alternatives and has identified and committed to the only feasible alternative to rock protection which is the use of mattresses or a similar product as identified in REP6-018 and secured through the outline HHW SAC control documents and Condition 3(1)(g) of the Transmission DMLs. TWT has not identified any feasible alternatives which have not already been considered and ruled out. Due to the considerable mitigation which the Applicant has committed to (see Table 4.2 in the outline HHW SAC control documents [REP14-031]), there can be no suggestion that Norfolk Boreas is being developed <i>"in the way which they [wind farm projects] have [been] over the past 20 years"</i>.</p>
Views on proposed compensation	
<p>TWT Provides its views on the four options that the Applicant put forward for final consideration within its HHW SAC In principle compensatory measures document [REP11-014].</p> <p>TWT agrees with Natural England and the Applicant that establishing a new reef feature and removal of disused anthropogenic infrastructure and litter are unlikely to provide suitable compensation.</p> <p>TWT does not support the method proposed by the Applicant of site extension as a compensatory measure for the following reasons:</p> <ul style="list-style-type: none"> • <i>"The process to extend or create new designated sites is lengthy and we question if there are statutory resources available to undertake this work.</i> • <i>By extending or designating new sites, it allows for the chipping away and deterioration of existing sites. This is not acceptable as a mechanism, especially considering the scale of offshore wind farm development planned.</i> • <i>Extending or creating new sites will create further problems in the future for offshore wind farm development, complicating the consenting process and further putting the UK MPA network at risk."</i> <p>TWT does however consider fisheries management (at a strategic level) as a viable option which should be given further consideration. However, TWT does recognise</p>	<p>Firstly, it is important to note that the Applicant worked with Natural England as the SNCB and the MMO as the regulator, to develop the compensatory package for the HHW SAC should this be required. All three parties are in agreement that the package presented would deliver the compensation as necessary and this has been confirmed in Natural England's comments on responses to written question 5.8.6.1 <i>"With regards to the HHW SAC compensatory package Natural England can confirm we are content with the package that has been presented."</i> [REP15-009].</p> <p>The Applicant does agree with TWT that establishment of new reef and recovery of anthropogenic infrastructure and litter are less likely to provide suitable compensation.</p> <p>TWT does not support the extension of the HHW SAC as a compensatory measure. This is in direct contradiction to the Applicant's and Natural England's view that this is the preferred option. Natural England state in [REP9-048] <i>"Natural England considers that an extension to the HHW SAC would be the most environmentally beneficial measure of those considered to deliver compensation for both Annex 1 Reef and Annex 1 Sandbank. We believe that the proposed measure has the potential to provide functions comparable to those that had justified the selection of the original site."</i></p> <p>TWT instead consider that the management of fisheries at a strategic level would be the most suitable method of compensation.</p>

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there are many obstacles which would need to be overcome to do this such as the many tools, regulatory mechanisms and policy that will be required to achieve this, alongside spatial planning. TWT also note that we are in a time of transition on fisheries management which is associated with Brexit and the Fisheries Bill.

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The Applicant responds to each of TWT's points in turn below:

- The process to extend the HHW SAC could be completed relatively quickly, especially given that the SNCB and regulator has worked with the Applicant to develop this proposal. The Applicant does acknowledge that further discussions are required with stakeholders, such as the Eastern Inshore Fisheries and Conservation Authority (Eastern IFCA), to determine the exact size of the extension. This would be undertaken once it had been determined by the SoS what, if any effects constitute AEoI and therefore once the size of the area which requires compensation is known. The Applicant also considers that this process would be under the control of the developer, SNCB and the regulator, whereas implementing a strategic level of control on fisheries (the preferred option by TWT) would not be and would therefore take significantly longer to implement.
- By extending the HHW SAC to include more Annex I reef and Sandbank Habitat, this would increase the overall network of these habitats. Therefore, the network would remain intact and be "maintained" as required. Furthermore, the proposals put forward by the Applicant would compensate for the area lost at least 10 times over, meaning that the protection for the *Natura 2000* network for these Annex I habitats would be increased, rather than "chipped away".
- Given that the proposal is to increase the site on its western boundary and that the Norfolk Boreas and Norfolk Vanguard wind farms extend almost to the boundary of UK territorial waters it is unlikely that any other windfarms could be positioned in such a way that they would need to route a cable through a westerly extension to the HHW SAC or indeed the existing site for that matter. Therefore, the Applicant does not consider that this measure would pose any additional issue for future wind farm projects. The HHW SAC and the North Norfolk Sandbanks and Saturn Reefs SAC are positioned such that any future UK windfarm located in the vicinity of the Norfolk Boreas project is likely to need to route its cables through one of these sites, but the extension of the HHW SAC in a westerly direction would not, in any way, increase the chance of an interaction.

Summary of Submission	Applicant's Comments
	<p>In further response to TWTs support of fisheries management as the best compensatory measure; The Applicant would like to highlight that Natural England in REP9-048 <i>“agrees with the Applicant that it would be difficult to determine appropriate methodologies for and the level thereof of intrusive fisheries practices that would need to be removed to offset the impacts and demonstrate the additive benefit. It is also reliant on buy-in from fishermen. Natural England notes that there is currently no authority with jurisdiction to deliver fisheries management areas as compensation.”</i> Furthermore, in REP10-055 the Eastern IFCA state <i>“Eastern IFCA will not support compensatory measures that increase restrictions on fishing activities”</i></p> <p>Therefore, as neither the IFCA nor the SNCB support fisheries management as a compensatory measure, it is uncertain if this would be deliverable at all, and if it was, it is likely that the process of delivery would take far longer than an extension of the HHW SAC.</p>
<p>Conclusion</p> <p><i>“Sufficient time has not been provided to discuss and develop a compensation option for cabling impacts on Haisborough, Hammond and Winterton SAC. TWT recommends the establishment of a group to develop a compensation package which would be conditioned as part of the DCO and request to be part of this group.”</i></p>	<p>The Applicant has worked with Natural England and the MMO throughout the pre-application process and through the examination (totalling four years) to minimise impacts of cable installation and cable protection on the HHW SAC and, without prejudice to the Applicant's conclusion of no AEoI, it has worked with both bodies on a compensatory measures package which all have agreed would deliver the appropriate level of compensation should it be required. The Applicant therefore dispute the assertion that sufficient time has not been provided. TWT has not wished to engage in this process until this late stage of the examination despite being afforded every opportunity. Should the SoS conclude that there is an AEoI, the Applicant would consider the inclusion of TWT in any consultation however priority would be given to the views of Natural England as the Statutory Nature Conservation Body.</p>
<p>REP14-067: Comments on Natural England's response to Deadline 14: Review of the Norfolk Vanguard and Hornsea Project Three decision in relation to the Boreas examination advice on HRA benthic considerations</p>	
<p>TWT endorse a number of statements which Natural England have made within REP14-067, on the following topics</p> <ul style="list-style-type: none"> • Use of Site Integrity Plan (SIP) for cabling in Haisborough, Hammond and Winterton SAC to defer judgment on AEoI. 	<p>The Applicant responded to REP14-067 in section 1.4 of REP15-004. In summary the Applicant highlighted that although REP14-067 provided a summary of Natural England's view on the Norfolk Vanguard and Hornsea Project Three decisions, it did not frame this advice in the context of Norfolk Boreas. Natural England later</p>

Summary of Submission	Applicant's Comments
<ul style="list-style-type: none"> • Recoverability and reversibility • Temporary vs permanent impacts (Although TWT disagree with Natural England stating that impacts on the Boreas project must be considered to be permanent). • Monitoring (stating that the impacts of the cable protection should be monitored during the lifetime of the project. • Reference to Dogger Bank decisions • Small scale losses <p>TWT request to be a consultee with regards to all documentation relating to cabling.</p>	<p>clarified in REP15-009 that these views were based on “an industry wide position” which was not specific to Norfolk Boreas. Therefore, TWT have taken the statements made in REP14-067 out of the full context of the Norfolk Boreas examination. In response to TWT's specific points the Applicant has the following comments:</p> <ul style="list-style-type: none"> • As stated numerous times throughout the Norfolk Boreas examination it has never been the Applicant's intention to defer judgement on AEoI to post consent. Natural England, the MMO and the Applicant are all in agreement on this point. • The Applicant provides an extensive list of examples to support the position that recovery is the most likely outcome in REP13-013 (Applicant's response to R17.1.24). There has been little or no directly relevant evidence submitted to the Norfolk Boreas examination to demonstrate that recovery in dynamic sandbanks systems would not occur. • The Applicant considers that TWT may disagree with Natural England on this point as they are not aware of the work that has been done between the Applicant and Natural England to ensure that the impacts of cable protection will not be permanent. • As described in REP15-004 there is no logic to Natural England's request to monitor the impacts whilst the cable protection is in situ. Instead, and to achieve Natural England's aims, monitoring should be required pre-construction, which is already secured under the HHW SAC control documents (Document 8.20) and then post construction, which the Applicant agrees would form part of the decommissioning licence that would need to be sought from the MMO at the point of decommissioning. Since Natural England made the statement in REP14-067 the Applicant and Natural England have agreed wording for Condition 20 which does not include a requirement to monitor the impacts of the cable protection whilst it is in situ. • As stated above, the Applicant has never relied upon the Dogger Bank decision in its conclusions of no AEoI, nor did the SoS in its HRA Appropriate Assessment for Norfolk Vanguard, therefore this comment which may be relevant to Hornsea Project Three is not relevant to Norfolk Boreas.

Summary of Submission	Applicant's Comments
	<ul style="list-style-type: none"> The Applicant responded in full to Natural England's comments on small scale loss within REP15-004. In summary, the Applicant considers that these comments were made in response to Hornsea Project Three's application, without having regard to the fact that the area of habitat loss of Norfolk Boreas would be 1/25th of that proposed by Hornsea Project Three nor were the considerable mitigation measure committed to by Norfolk Boreas (such as commitment to not using rock protection and to decommission cable protection) considered when making these statements. <p>All documents relating to cabling would be approved by the MMO (or the SoS if Requirement 14 is included) (in consultation with the SNCB) and therefore it would be for the MMO or the SoS to decide whether TWT should be a consultee on these documents. However, given the divergence of opinions between TWT, Natural England and the Applicant and the lack of engagement on these matters by TWT thus far on Norfolk Boreas, the Applicant's view is that it is not appropriate for TWT to be a named consultee.</p>

Appendix 1. Oulton PC Update from Vattenfall, 14th September 2020

From: susan.falch-lovesey@vattenfall.com
To: [REDACTED]
Cc: [REDACTED]
Subject: OULTON Parish Council Update from Vattenfall
Date: 14 September 2020 19:41:51
Attachments: [Oulton Compound.PNG](#)
Importance: High

Dear Lloyd

I hope this finds you well, I wanted to make contact ahead of your forthcoming Parish Council meeting next week as you may notice some additional activity for a short while associated with our advanced studies. These will feed into detailed design - the next phase of project development, post consent.

As you will be aware, much early work, including aerial photography, non-penetrative geophysics, an initial campaign of drill sampling to ground truth existing and new data commissioned by us, and all the feedback from stakeholders including local residents has already fed-into refining our understanding and determining the most appropriate and sensitive local for infrastructure installation.

This next round of works is a further progression of that, adding even greater detail to our design process and involves additional "ground truthing"/checking up with real samples, what our extensive data-set is telling us. The works are ongoing offshore as well as starting onshore too. Onshore, the site investigations will begin in the vicinity of the onshore project substation, then move to landfall, then progress along the onshore cable corridor. For these works, which will continue for appropriately 8 weeks, we require a location for a welfare facility and a temporary storage container. It has been agreed with the relevant landowner that we will use the future Cable Logistics Area near Oulton for the purposes of a central works compound relating to the onshore SI campaign. For clarity, this is at The Hanger, off Heydon Road, Oulton NR11 6QZ – and shown in the attachment.

As you know, access is taken along The Street, followed by a right turn on Heydon Road. The Hanger is then on the right.

What residents may notice would be some activity during the first couple of days, setting up the compound area with two temporary containers installed – one to house welfare facilities for periodic visits by the team, and the other to store equipment and samples coming from site and being collected to go for analyses.

Presence at the compound will then be limited to occasional with a handful of personnel - delivering and collecting soil samples and equipment in a pickup truck or cars. Remaining workforce will be out at SI locations starting at the onshore project substation area, then elsewhere as described above.

Please do be in contact if you have further questions.

Kind Regards

Sue



Appendix 2. Oulton Parish Council Cable Logistics Area Update, 14th September 2020

Beth Travis

From: catrin.jones@vattenfall.com

Sent: 30 September 2020 11:28

To: [REDACTED]

Cc: [REDACTED]

info@norfolkvanguard.co.uk

Subject: RE: Re Cable logistics Area

Dear Susan, Paul and all,

Thank you for your correspondence and the queries you have sent us. I have replied as fully as possible, but as I suggested earlier, it might help to speak directly, so that I can answer any other questions which arise from my responses set out below.

As noted in our mail of 14th September, the site will be used to support some pre-construction surveys which we are conducting across the entire onshore project area. There is a small welfare facility there, and laydown/storage area for equipment/samples. The works are very low intensity. Typical associated traffic movements might be a small number of cars used by personnel on an infrequent basis (e.g. up to 5 cars through the course of a day to deliver samples, use welfare facility etc). Also on an infrequent basis, we estimate an average 3 per week, the site will be used for the delivery and pickup of equipment/samples by HIAB trucks (similar to those used by builders' merchants, with a small crane attached for lifting 1 ton load-bags for example, as used for building supply deliveries).

I hope you can be reassured that while the pre-construction surveys are being conducted throughout the onshore project area, we will limited the use of this site as far as possible. On some days, no vehicles will access the site.

As you know, the site is proposed to be used as a Cable Logistics Area for buffer storage of cable drums (if required) during the cable pulling phase of the onshore works. This site will not be used during the higher intensity duct installation construction phase, as in order to limit traffic, we will be conducting those works using a sectionalised approach from defined mobilization areas. I have sought to answer each of your questions below.

- 1) What will be the hours of operation of the site?
8am to 6pm Monday to Friday and 8am to 1pm on Saturday.
- 2) Will Vattenfall direct **all** site traffic, large or small, to **only** access the site via the B1149 Holt Road and never come through the northern end of Oulton Street?
Only cars/pickups as described above, will access the site, their normal route would be as described in our communication of 14th September, 2020.
- 3) How will this be monitored and enforced?
Given the very low level of vehicles accessing the site, we do not see any need for monitoring or enforcement. The pre-construction works being undertaken will not materially alter the current levels of vehicles accessing the site.
- 4) How will individual project vehicles be identified and will this identifier be communicated to the Parish Council, so that residents can be informed?
Again, we do not feel this is necessary given the scale and nature of the works, with very low levels of vehicles, predominantly personnel cars, accessing the site.
- 5) What are the **dates** for when this site investigation work is due to start and finish?
The current ground/site investigation works mobilised to the location on the 15th September and the campaign is due to be complete by/during the first week in November.
- 6) Have you appointed a Community Liaison Officer and, if so, can OPC be informed of a contact number?

We have a LLO – Sue Falch-Lovesey – to whom you have direct access. We also have an info line telephone number widely advertised (here for ease: 0800 019 3517), and of course, as offered above, you can also call me.

The CLO(s) will be appointed prior to the start of construction.

7) Will Vattenfall communicate all relevant information about this new situation directly to the residents of The Old Railway Gatehouse?

We wrote to the residents of The Old Railway Gatehouse earlier this month, and offered to speak to them personally.

8) What is the **next use** of this site that Vattenfall has in mind?

We also plan to use this site during the archaeological pre-construction investigative phases. A team of approximately 10 archaeologists will be working at various sites along the cable corridor between Happisburgh and Necton. The site will be used in a similar way and for similar purposes to those currently underway by the ground investigation campaign, namely as a welfare location and for storage of some equipment/samples.

As I say, I hope you find the above allays some of your concerns, and I would be happy to have a chat (and follow-up with “on-the record” answers too if you like).

Best wishes,

Catrin

Dr. Catrin Ellis Jones
Stakeholder Engagement & Communications Manager
Norfolk Vanguard and Norfolk Boreas



catrin.jones@vattenfall.com

www.vattenfall.com

www.vattenfall.co.uk/vattenfallinnorfolk



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Confidentiality: C2 - Internal

From: Paul Killingback [REDACTED]
Sent: Tuesday, September 29, 2020 12:22 PM
To: Jones Catrin (WO-MC) <catrin.jones@vattenfall.com>
Cc: [REDACTED]
Subject: Re: Re Cable logistics Area

Good afternoon Catrin,

Susan is currently also not available and so I am responding to your email message on my iPhone for speed.

I appreciate your offer of a telephone call to discuss the points we have raised but I would prefer a full written response from Vattenfall in order to obtain clarity and prevent any unintentional confusion that might arise with verbal conversations that could in future be classed as 'off the record' and not binding.

Oulton and our surrounding neighbourhood is facing a prolonged and relentless period of disturbance and upheaval caused by the many proposed schemes around us and it is vital that we have a documented record of what each of the developers tell us and hold them fully to account should there be any variance or additional issues arising

I personally do not feel that any of the developers have any real feel for the strength of feelings that there is in all communities along the proposed route. We therefore need to ensure all communication is 'on the record'

I would therefore be grateful if you could respond in writing as requested.

Thank you,

Regards

Paul Killingback
Chair
Oulton Parish Council

Sent from my iPhone

On 29 Sep 2020, at 10:00 am, catrin.jones@vattenfall.com wrote:

Good morning Susan,
Sue is in meetings today, but having seen your e-mail this morning, I thought a swift response might be in order.

I will respond to each of your questions in turn, and copy all in to the response, but in the interim, would you like to have a quick telephone call?

Many of your questions are easily answered and a conversation might also enable further clarification and I hope help to allay any concerns you may have?

Please feel free to give me a ring directly on [REDACTED]

Regards,
Catrin

Dr Catrin Ellis Jones

Confidentiality: C2 - Internal

From: Susan Mather [REDACTED]
Sent: Tuesday, September 29, 2020 8:55 AM
To: Falch-Lovesey Susan (WO-MC) <susan.falch-lovesey@vattenfall.com>
Cc: Paul Killingback [REDACTED]; Alison Shaw [REDACTED]; Greg Peck [REDACTED]; Andy Windross [REDACTED]; Andy Nash <ananjeis@btinternet.com>; Parish Clerk <oultonpc@gmail.com>; Jones Catrin (WO-MC) <catrin.jones@vattenfall.com>; info@norfolkvanguard.co.uk
Subject: Re Cable logistics Area

Dear Susan Falch-Lovesey,

Thank you for your email of 14th September informing Oulton Parish Council of Vattenfall's intention to use the 'Cable Logistics Area' as a "central works compound" during site investigation work.

At this week's meeting of the Parish Council this email was discussed, and I am instructed to respond to you in the following terms.

Oulton Parish Council is surprised, disappointed and alarmed to receive this information from Vattenfall.

We are especially alarmed to read of the Cable Logistics Area (CLA) being used in this way, as a "central works compound" for work along the whole length of the cable corridor, right at the outset of your project even before construction has started. This only serves to confirm our longstanding suspicion that the "Cable Logistics Area" is in fact a Main Construction Compound hiding behind another, more innocuous-sounding, name.

We have no recollection of this pre-construction, "central works compound" use of the Hangar site being mentioned during the Norfolk Vanguard Examination. On the contrary, whenever we expressed our concerns, we were 'reassured' by Vattenfall that the CLA site would only be used at the cable-pulling phase.

We would be grateful if you would draw our attention to where exactly this use of the site is described and secured in the DCO for Norfolk Vanguard. *Please do not only list numbers of the documents where these references might appear, but also provide us with the full relevant extracts from the text.*

We are now concerned that this use of the site as a "central works compound" may fall outside the safeguards secured within the DCO, and we therefore have immediate concerns about the Hangar site, as follows:

1) What will be the hours of operation of the site?

2) Will Vattenfall direct **all** site traffic, large or small, to **only** access the site via the B1149 Holt Road and never come through the northern end of Oulton Street?

3) How will this be monitored and enforced?

4) How will individual project vehicles be identified and will this identifier be communicated to the Parish Council, so that residents can be informed?

5) What are the **dates** for when this site investigation work is due to start and finish?

6) Have you appointed a Community Liaison Officer and, if so, can OPC be informed of a contact number?

7) Will Vattenfall communicate all relevant information about this new situation directly to the residents of The Old Railway Gatehouse?

8) What is the **next use** of this site that Vattenfall has in mind?

Oulton Parish Council looks forward to hearing from you at your earliest opportunity. Do please include the Clerk to the Council in your reply.

Regards
Susan Mather
pp Oulton Parish Council

We have recently changed the registered offices of a number of our companies. The following are now registered at First Floor, 1 Tudor Street, London, EC4Y 0AH:
Vattenfall Wind Power Ltd, Vattenfall Heat UK Limited, Clashindarroch Wind Farm Limited, Vattenfall UK Sales Limited, Norfolk Boreas Limited, Kentish Flats Limited, Norfolk Vanguard Limited, Ormonde Energy Limited, Ourack Wind Farm One Limited, Ourack Wind Farm Two Limited, Thanet Offshore Wind Limited.