



Hornsea Project Four

Written Summary of the Applicant's Oral Case at Compulsory Acquisition Hearing 1

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Prepared Pinsent Masons LLP, April 2022
Checked Gareth Taylor, Orsted, April 2022
Accepted Faye McGinn, Orsted, April 2022
Approved John Galloway, Orsted, April 2022

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Revision Summary

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1 Introduction

- 1.1.1.1 Compulsory Acquisition Hearing 1 (CAH1) for the Hornsea Project Four Offshore Wind Farm took place on 13 April 2022 at 10am and was held virtually, with attendees attending via Microsoft Teams.
- 1.1.1.2 The CAH1 broadly followed the agenda published by the Examining Authority (the ExA) on 23 March 2022 (The Agenda).
- 1.1.1.3 The ExA, the Applicant, and East Riding of Yorkshire Council discussed the Agenda items which broadly covered the areas outlined below:
 - Section 122 and 123 of the Planning Act 2008;
 - Section 135 of the PA2008 – Crown land;
 - Sections 131 and 132 of the PA2008;
 - Temporary Possession or Compulsory Acquisition; and
 - Funding.

Table 1: Hearing Summary

Item	ExA Question/Context for discussion	Applicant's Response
<i>Agenda item 1 - Welcome, introductions, arrangements for the hearing</i>		
1	The Examining Authority ("ExA") opened the hearing, introduced themselves and invited those parties present to introduce themselves.	The following parties introduced themselves on behalf of the Applicant: Ms Claire Brodrick, Senior Associate, Pinsent Masons LLP Mr John Galloway, Head of UK Land and Property at Ørsted Mr Edward Higson, Director at Dalcour Maclaren (land agent for the Applicant)
<i>Agenda item 2 – Section 122 and 123 of the Planning Act 2008 (PA2008)</i>		
2	The case for compulsory acquisition ("CA") and temporary possession ("TP") and whether the case meets the tests of the Planning Act 2008: The ExA asked the Applicant to briefly set out the case for compulsory acquisition.	<p>Ms Brodrick on behalf of the Applicant confirmed that the Applicant's case for compulsory acquisition ("CA") and temporary possession ("TP") powers was set out in the Statement of Reasons (APP-227). Ms Brodrick confirmed that the application included a request for CA powers in accordance with s 123(2) of the Planning Act 2008 ("PA 2008").</p> <p>Ms Brodrick explained that the purpose for which CA powers are being sought is also set out in Section 6 of the Statement of Reasons and relates to the construction, use, maintenance and decommissioning of the onshore elements of Hornsea Four including rights of access and rights for landscaping and other mitigation measures. In particular, this includes CA powers to acquire the freehold for the HVAC converter station/HVAC substation and EBI; the acquisition of new rights and imposition of restrictions at landfall; and the acquisition of new rights and imposition of restrictions for the construction, use and maintenance of onshore export cables.</p> <p>Ms Brodrick added that Table 1 of the Statement of Reasons and Schedule 6 of the dDCO set out the nature of the rights and restrictions being sought.</p> <p>Ms Brodrick referred to s122(2) of the PA 2008 which requires that the land must be required for the development or required to facilitate or is incidental to the development. Ms Brodrick confirmed that the CA powers being sought are required for the development or to facilitate the development and explained that this is set out in more detail in Section 7 of the Statement of Reasons.</p> <p>Ms Brodrick referred to s122(3) of the PA 2008 which states that there must be a compelling case in the public interest in order for CA powers to be granted. Ms</p>

		<p>Brodrick explained that the compelling case for Hornsea Four is summarised in Section 7 and Section 8 of the Statement of Reasons and set out in more detail in Statement of Need (APP-234). Ms Brodrick added that the Statement of Need sets out in detail the reasons for the urgent need for renewable energy, which has been recently supplemented by the British Energy Security Strategy including the Government’s target of 50GW of renewable offshore wind by 2030.</p> <p>Ms Brodrick referred to a number of other tests that are applicable in relation to the grant of CA powers, including a requirement for the Applicant to demonstrate that they have considered reasonable alternatives. Ms Brodrick confirmed that consideration of reasonable alternatives is set out in paragraph 7.2.1.5 of the E1.2 Statement of Reasons (APP-227) and A1.3 ES: Site Selection and Consideration of Alternatives (APP-009) and the relevant appendix (APP-038). Ms Brodrick added that the Applicant has adequately considered alternatives both in terms of route selection and alternatives means of technology. However, for the reasons set out in the Applicant’s response to FWQ CA.1.1.1 and PDS1.1 (REP-2-038), the Applicant’s position is that there is a need for CA powers for both HVAC and HVDC transmission technology.</p> <p>Ms Brodrick confirmed that the Applicant has also sought to acquire all land and rights by voluntary agreement as an alternative to the use of CA powers (an update on the status of those negotiations is provided below).</p> <p>In summary, Ms Brodrick confirmed that the Applicant considers the rights, restrictions and temporary use powers that the Applicant is seeking in the DCO Application to be necessary and proportionate and referred the ExA to Section 7 of the Statement of Reasons for detailed information.</p>
2	<p>The ExA asked the Applicant if it proposed to update the Statement of Need to reflect recent events involving energy need in the UK.</p>	<p>Ms Brodrick confirmed that the Applicant would update the Statement of Need and noted that in order to ensure it was as up to date as possible by the close of the Examination, the aim was to submit the updated version by deadline 7. This would ensure that the Statement of Need would capture all relevant policies released by the Government to date and any additional policies that may be released between now and then. As an example, Ms Brodrick referred to the fact that the draft national policy statements may be adopted between now and the end of the Examination.</p>

2	<p>The ExA shared its screen with the attendees at the hearing. The first question related to sheet 1 of the Land Plans (APP-210). The ExA noted that plot 15 included a larger area of land and the reason given was to avoid a building that contains owls. The ExA asked if any further work had been done to be able to refine the land take needed for TP.</p>	<p>Ms Brodrick confirmed that the area shown for plot 15 was the minimum amount of land required in order to appropriately avoid and mitigate impacts on the owls.</p>
2	<p>The ExA then turned to plot numbers 5 and 6 on the foreshore. The ExA noted that this land was required for a temporary access track and construction ramp. The ExA queried why that amount of land was required for a temporary access track, particularly given the location on the foreshore. The ExA also asked why that access could not be incorporated into blue land.</p>	<p>Ms Brodrick explained that the track was required for emergency access only and that the extent of the land shown was the minimum land required in order to accommodate geographical features both in terms of the access from the cliff top onto the beach and then across the beach to the blue area in the event that a horizontal directional drilling (“HDD”) had failed. Ms Brodrick added that at this point in time the Applicant did not know exactly where on the beach it would need to take access so a certain amount of flexibility had been provided.</p>
2	<p>The ExA turned to plot 67 on sheet 6 of the Land Plans. The ExA asked the Applicant to clarify why the temporary access track (Work No. 9a) was needed.</p>	<p>Ms Brodrick confirmed that the temporary access at plot 67 was required to gain access to the HDD on either side of the cable corridor to avoid disturbing a pond and agricultural features.</p>
2	<p>The ExA referred to plots 131, 132, 133, 136 and 137 on sheet 11 of the Land Plans and asked why two access points were needed in this location.</p>	<p>Ms Brodrick confirmed that access was required in these locations for highway safety reasons as per discussions with East Riding of Yorkshire Council (“ERYC”). Ms Brodrick added that access was required both to the north and south of the cable corridor in this location.</p>
2	<p>The ExA turned to sheet 14 of the Land Plans and the temporary logistics compound at plot 154. The ExA noted that all other logistics compounds have direct access from the highway but this one did not and asked if that was an oversight.</p>	<p>Ms Brodrick confirmed that access will be taken from within the blue cable corridor so separate access for the compound was not needed.</p>
2	<p>The ExA highlighted plots 224, 225 and 226 on sheet 19 of the Land Plans and asked why access was required either side of the highway.</p>	<p>Ms Brodrick confirmed that, as per sheet 11, these accesses were required due to highway safety reasons and in order to have access both to the north and south of the cable corridor.</p>
2	<p>The ExA turned to plot 297 on sheets 25 and 26 of the Land Plans and noted again that the temporary logistics compound had no direct access from the highway and asked if this was an oversight.</p>	<p>Ms Brodrick confirmed that, as per sheet 14, access would be taken from the cable corridor shown in blue.</p>

2	The ExA requested that confirmation be provided in writing in respect of each of the plots referred to.	Written confirmation on the above points and, where applicable, further details are set out in the Applicant's response to the action points at the end of this written summary
2	The Applicant to provide a brief update on the progress of negotiations and deadlines for their conclusions: The ExA noted that National Grid had questioned the amount of land being sought by the Applicant adjacent to the substation at Creyke Beck. The ExA also included a question in this in their First Written Questions ("FWQs"). The Applicant responded to advise that the Order limits were wider around Creyke Beck substation to allow sufficient flexibility for certain extension works at the substation. The Applicant had indicated in its response that the works and therefore Order limits could later be refined. The ExA asked for an update on negotiations with National Grid.	Mr Galloway on behalf of the Applicant advised that in addition to the information contained in its response to FWQ CA.1.9 (REP2-038) and its response to National Grid's relevant representation (REP1-038), there were ongoing discussions between National Grid Electricity Transmission (as freehold owners of the land) and the Applicant in respect of the amount of land required. Mr Galloway confirmed that the discussions are not yet at a stage where it is possible to reduce the Order limits or the powers being sought. Mr Galloway added that National Grid Electricity Transmission are currently going through their internal clearance processes to continue discussions with the Applicant. As such, no further progress is expected in the next four weeks but Mr Galloway confirmed that the Applicant is confident that sufficient progress on both the land agreements required in this location and, if necessary, a refinement of the Order limits will be made before the close of the Examination.
2	The ExA noted that it was aware from deadline 2 submissions that the Applicant is actively in discussions to secure voluntary agreements and asked for a general update.	Mr Galloway referred to the update on negotiations provided at deadline 2 (REP2-022) and confirmed that agreements have been signed and completed, or are signed and with solicitors pending completion, with 90.7% of landowners and 100% of occupiers across the Order limits. Mr Galloway added that the Applicant has therefore reached agreement for the necessary land rights for 97.8% of the land required within the Order limits. In particular, the Applicant has secured land rights for the onshore substation and EBI north of Cottingham and to the east of Creyke Beck substation. Mr Galloway confirmed that the Applicant has concluded negotiations for voluntary agreements with all private individuals and farming businesses within the Order limits. Mr Galloway noted that there were only four remaining landowners with whom the Applicant is engaged in negotiations for voluntary agreements. These were the Environment Agency ("EA"), ERYC, National Grid Electricity Transmission and Network Rail.
2	The ExA noted that there were a number of plots which still had outstanding concerns from landowners or occupiers and requested an update from the Applicant.	Mr Galloway confirmed that the Applicant had written to the representatives of the Hotham Family Trust and asked them to withdraw their relevant representation (RR-034). Mr Galloway added that the representation was

	<p>Hotham Family Trust: The ExA noted from deadline 2 submissions that agreement had been reached with the Hotham Family Trust and asked the Applicant if the objection would be formally withdrawn.</p> <p>The ExA noted that a very short email from the Hotham Family Trust would suffice to confirm that they had signed a voluntary agreement and that it was important for the ExA that they did receive such confirmation.</p>	<p>submitted simply as a holding response to ensure that they were involved in the process. Mr Galloway reiterated that agreement had been reached, there were no matters outstanding and the Applicant was continuing to engage with them on an informal basis, as it does with all landowners with whom the Applicant has reached agreement.</p> <p>Mr Galloway explained that he did not anticipate that the Hotham Family Trust would attend hearings or make further representations but also that they may not withdraw the representation as they wished to be involved in the process.</p>
2	<p>Mr and Mrs Taylor: The ExA noted that Mr and Mrs Taylor were residents but did not constitute landowners or occupiers in respect of the land within the Order limits and asked the Applicant to confirm.</p>	<p>Mr Galloway confirmed that the written submissions were correct and that Mr and Mrs Taylor did not own or occupy any land within the Order limits or any land that would be left unworkable by agricultural machinery. The land within the Order limits that adjoins their property is owned by their landlord, Albanwise Limited. Mr Galloway confirmed that Mr and Mrs Taylor's interests identified in the Book of Reference (REP2-024) pertained to a Category 2 interest, being a right of access and a right of drainage over adjoining land. They had also been included as Category 3 claimants due to the proximity of their residence to the onshore substation and energy balancing infrastructure. Mr Galloway confirmed that the Applicant would be meeting with Mr and Mrs Taylor on 21 April 2022 to continue the Applicant's constructive dialogue with them.</p>
2	<p>The ExA asked if the Applicant would consider Mr and Mrs Taylor to be affected persons by the purposes of CA.</p>	<p>Ms Brodrick confirmed that Mr and Mrs Taylor would fall within the definition of "affected persons" within the PA 2008, even though they do not own or occupy land within Order limits.</p>
2	<p>Mr and Mrs Foreman: The ExA asked the Applicant for an update on discussions with Mr and Mrs Foreman.</p>	<p>Mr Galloway confirmed that an agreement had been successfully reached with Mr and Mrs Foreman relating to plots 94 to 107 inclusive and that those agreements were signed and with solicitors pending completion. Mr Galloway confirmed that the Applicant had made contact with the representatives of Mr and Mrs Foreman and had asked them to withdraw their relevant representation (RR-005). Mr Galloway anticipated that this representation would be withdrawn shortly.</p>
2	<p>Mr and Mrs Goatley: The ExA asked for an update on negotiations with Mr and Mrs Goatley. The ExA noted that Mr and Mrs Goatley appeared to have sold the farm to ERYC and that planning permission for a</p>	<p>Mr Galloway confirmed that the Applicant was made aware that the sale of the property completed on 8 April 2022, meaning the land within plots 149 to 151 was now in the ownership of ERYC. Mr Galloway confirmed that the Applicant had contacted Mr and Mrs Goatley's representative to request that they withdraw their</p>

	change of use had been granted. The Applicant had stated that it no longer needed to continue discussions with Mr and Mrs Goatley but that it would need to discuss with ERYC in respect of the same land. The ExA asked if that was correct and requested that the Applicant provide a general update	objection and that the Applicant would continue to follow up on that request. Mr Galloway confirmed that draft agreements had been issued to ERYC on 4 April 2022 and that the Applicant was confident that agreement could be reached before the close of the examination.
2	The ExA asked if the Book of Reference would be updated accordingly.	Mr Galloway confirmed that the Applicant would update the Book of Reference accordingly at deadline 7, subject to being provided with sufficient evidence of ERYC's ownership.
2	Network Rail: The ExA noted that Network Rail had objected to the CA of plot 176 but that it had noted in recent submissions that the parties are close to finalising agreements that will allow the Applicant to lay the cable under the railway. The ExA asked if this was correct and to provide an update.	Mr Galloway confirmed that a meeting took place on 30 March 2022 to run through the outstanding matters in respect of the land agreements for plot 176. Mr Galloway added that agreement was reached with Network Rail and that a final form of the draft legal documents had been issued to Network Rail's solicitors. Mr Galloway was therefore confident that matters could be concluded with Network Rail prior to the close of the Examination.
2	ERYC: The ExA highlighted that ERYC indicated in its relevant representation that they had concerns regarding the potential impact on the compulsory purchase order for the Jock's Lodge junction improvement scheme. The ExA asked for an update on discussions between the Applicant and ERYC and whether these discussions were likely to conclude before the close of examination.	Mr Galloway confirmed that it was correct that agreement on heads of terms had not yet been concluded and the outstanding matter being negotiated was the interaction between Hornsea Four and the Jock's Lodge junction improvement scheme. However, Mr Galloway noted that a meeting between the parties had been scheduled for 21 April 2022 to discuss in more detail how the projects will co-exist and the Applicant was confident that an agreement would be reached before the end of the Examination. The Applicant notes that Mr Mansall on behalf of ERYC confirmed that a meeting between engineers was taking place on 21 April 2022 and agreed with Mr Galloway that the parties hoped to be able to resolve any issues.
2	EA: The ExA asked the Applicant if it was confident that agreement could be reached with the EA before the close of Examination and queried whether this agreement would be secured by a land agreement or protective provisions in the DCO.	Mr Galloway for the Applicant confirmed that the EA were the freehold owners of Watton Beck (plots 158,159 and 160). He confirmed that the Applicant was in ongoing constructive negotiations with the EA and was aware of their most recent submission to the ExA dated 11 April 2022. The main point of negotiation still outstanding was the potential for future flood defence works and meetings between the parties' technical advisors were taking place. Mr Galloway advised that the Applicant had not yet scheduled the next meeting with the EA but that it was confident agreement could be reached before the close of Examination.

		Mr Galloway also confirmed that it was anticipated that the agreement would be documented in a land agreement as opposed to protective provisions.
2	The ExA asked the Applicant if there were any other parties that the Applicant thought should be discussed.	<p>Ms Brodrick on behalf of the Applicant noted that there had been a relevant representation (RR-013) and deadline 2 submission (REP2-074) submitted on behalf of Mr and Mrs Dransfield, who were listed as Category 3 persons in the Book of Reference on the basis that they could potentially make a claim under Part 1 of the Land Compensation Act 1973.</p> <p>Ms Brodrick confirmed that the Applicant responded to the relevant representation on behalf of Mr and Mrs Dransfield at deadline 1 (REP- 038) and would respond to their deadline 2 submission at deadline 3. Ms Brodrick added that Mr and Mrs Dransfield's concerns related primarily to the consultation process which the Applicant feels has been adequately addressed. However, as Mr and Mrs Dransfield are listed in the Book of Reference, Ms Brodrick felt it was important to note their representations and submissions in this compulsory acquisition hearing.</p>
2	The ExA confirmed this was noted. The ExA noted that the Mr and Mrs Taylor were also classed as Category 3 persons and asked the Applicant to confirm some tree planting had taken place to address their concerns.	Ms Brodrick on behalf of the Applicant confirmed it was correct that some tree planting had taken place in December 2021 as part of a voluntary agreement reached with the Mr and Mrs Taylor's landlord. Ms Brodrick confirmed that this additional screening was not part of the formal mitigation planting that has been assessed and relied on as part of the environmental impact assessment.
<i>Agenda item 3 – section 135 PA 2008 – Crown Land</i>		
3	<p>The ExA asked the Applicant to confirm that Crown consent was only needed for 6 plots of land where the export cable meets land at the beach ("Crown Consent").</p> <p>The ExA asked for an update on the status of discussions between the Crown Estate Commissioners ("CEC") and the Applicant.</p>	<p>Ms Brodrick on behalf of the Applicant confirmed that was correct and that the Applicant was not seeking CA powers over any other land in which the Crown had an interest.</p> <p>Ms Brodrick for the Applicant advised that the Applicant had formally written to the CEC requesting consent pursuant to s135(1) and s135(2) of the PA 2008 shortly after the DCO application for the Hornsea Four had been accepted. Ms Brodrick explained that the Applicant has been regularly chasing for a response and is confident consent will be obtained before the close of the Examination. The Applicant understood that the request for consent was being processed in the usual way.</p>
3	The ExA noted that one of the action points arising from Issue Specific Hearing 1 was that the ExA would write to the CEC to formally request the disclosure of an	Ms Brodrick thanked the ExA but noted that in the Applicant's experience the CEC had a standard process for issuing consent under s135 of the PA 2008 (including

	<p>Interface Agreement made between the CEC, National Grid Twenty Nine Limited and Smart Wind Limited on 14 February 2013 the "Interface Agreement"). The ExA asked if it would be helpful to also remind the CEC about the need for Crown Consent when liaising on the Interface Agreement.</p>	<p>the appointment of solicitors and a deed of covenant). The Applicant was confident this process was underway.</p> <p>Ms Brodrick also confirmed that the Applicant had received confirmation from the CEC in the evening of 12 April 2022 that they consented to the Interface Agreement being submitted to the examination. Ms Brodrick confirmed that the Applicant's solicitors and BP Exploration Operating Company Limited's solicitors were liaising to decide who was best placed to submit the Interface Agreement into the Examination.</p>
<p>3</p>	<p>The ExA noted that it had to consider the worst-case scenario when considering the application before it and asked the Applicant what the implications would be if Crown Consent were not obtained.</p> <p>The ExA stated that if Crown Consent had not been obtained by deadline 8, the Applicant would need to submit a statement outlining how it could proceed with the project.</p>	<p>Ms Brodrick confirmed that if Crown Consent was not issued for any reason, it would not be possible to seek CA powers over those plots of land in respect of interests held by other persons. However, Ms Brodrick noted that as these plots cover the foreshore any other interests in the land were limited.</p> <p>Ms Brodrick confirmed that the Applicant would submit such a statement but noted that section 135 of the PA 2008 only requires the CEC to provide their consent prior to a decision being issued by the Secretary of State. Ms Brodrick noted that consent had been provided during the determination period on a number of other DCO projects.</p>
<p><i>Agenda item 4 – Sections 131 and 132 of the PA 2008</i></p>		
<p>4</p>	<p>The ExA asked the Applicant to confirm that the only special category land involved in the Hornsea Four Offshore Wind Farm project is open space.</p> <p>The ExA asked the Applicant to set out how the tests in section 132 PA 2008 were met.</p>	<p>Ms Brodrick confirmed this was correct. She also stated that the Applicant is only seeking the acquisition of rights and therefore only section 132 of the PA 2008 applied. Ms Brodrick noted that s132 of the PA 2008 does not apply to powers for TP.</p> <p>Ms Brodrick confirmed that the tests in section 132 PA 2008 were satisfied as when burdened with the rights sought by the Applicant, the land would be no less advantageous to the public than before the imposition of those rights. This was due to the use of HDD (or another form of trenchless technology) by the Applicant, meaning that there would no restrictions on the use of the open space by members of the public once the cables are in place. Ms Brodrick noted that there may be some temporary restrictions for health and safety purposes during drilling operations but once completed there would be no interference with the public recreational use of the open space on an ongoing basis.</p>

4	The ExA asked the Applicant if the main impact would be on the coastal path and asked whether this was being diverted.	Ms Brodrick confirmed that the Applicant had sought powers to divert the coastal path during construction if required. Ms Brodrick noted that at present, the England Coast Path is not yet in place but powers were being sought in the DCO in case the England Coast Path is put in place between now and construction.
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Agenda item 5 – TP and CA powers

5	The ExA noted that there was a general concern that DCO applications are increasingly seeking TP rather than CA powers. The ExA asked the Applicant to confirm how it decided whether TP or CA powers were appropriate.	Ms Brodrick confirmed that the Applicant had sought powers over the minimum amount of land necessary to deliver Hornsea Four. Where land was only needed during construction, for example for construction access and compounds, only TP powers had been sought. Ms Brodrick noted that TP powers could also be exercised over land shown blue or pink on the Land Plans in accordance with Articles 28 and 29 of the dDCO. Ms Brodrick clarified that in the event that CA powers needed to be exercised (which was hopefully unlikely given the number of voluntary agreements in place), the Applicant’s intention was to use the TP powers to access the working area for the cable corridor during construction and then use the CA powers over the land actually used to install the cables. This would ensure that permanent rights were sought over the minimum amount of land necessary as the area of land over which permanent rights were required would be identified after the cables had been micro-sited.
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Agenda item 6 – Securing HRA compensation measures that have been advanced on a without prejudice basis

6	The ExA asked the Applicant if any of the HRA compensation measures under discussion required CA of land to deliver them.	On a without prejudice basis in respect of all compensation measures except those relating to kittiwake, Ms Brodrick confirmed that the Applicant was not seeking any CA or TP powers for the delivery of any onshore compensation measures if selected as the preferred mitigation. Ms Brodrick noted that the approach taken by the Applicant was consistent with that of other offshore wind farm projects such as Hornsea Three, Norfolk Vanguard and Norfolk Boreas. As set out in the Applicant’s response to FWQ HRA.1.34 (REP2-038), the intention is that if onshore property rights are required, voluntary agreements will be entered into with landowners. However, if that is not possible, and as a last resort, the Applicant would be able to use CA powers under the Electricity Act 1989 should that be necessary in order to deliver the compensation measure.
6	The ExA asked if any TP or CA rights would be required offshore.	The Applicant confirmed no TP or CA rights would be required for any offshore compensation measures.

Agenda item 7 – Funding

7	The ExA noted that it had included a precautionary item on the agenda to discuss funding before it had issued its FWQs. However, it had seen the Applicant's response to the FWQs at deadline 2 and was satisfied with the Applicant's response to FWQ CA.1.16. The Applicant notes that no further discussion of this topic was therefore required.	N/A
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Table 2: Applicant's Response to Action Point 2 from the CAH:

Plot Numbers in Land Plans	Works Numbers in the Works Plans	Sheet Number in both Works and Land Plans	Plot Justification
15	9a	Sheet 1	The Applicant can confirm that plot 15 is the minimum land requirement assuming that the owl is still nesting in the agricultural building at construction.
5 and 6	9a	Sheet 1	The Applicant can confirm that the entirety of plots 5 and 6 is required, and this is the minimum land requirement. Due to project safety requirements, this land at the foreshore is required to facilitate emergency access, which could include the launching of emergency vessels from the temporary bridge / ramp if required.

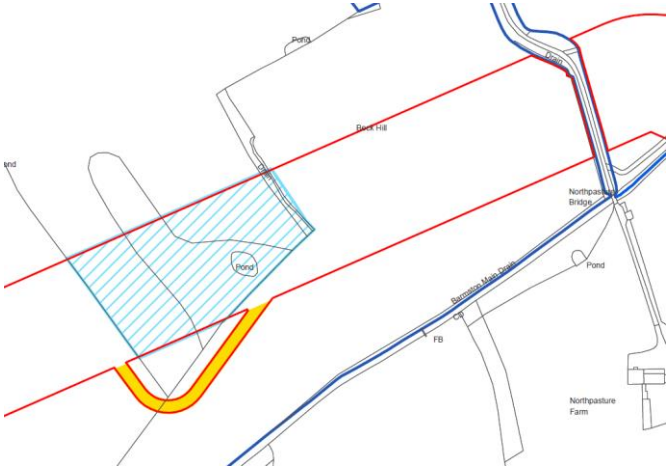
Plot Numbers in Land Plans	Works Numbers in the Works Plans	Sheet Number in both Works and Land Plans	Plot Justification
67	9a	Sheet 6	<p>The Applicant can confirm that they are committed to utilising trenchless technology under part of Plot 66, where a pond and agricultural features (ridge and furrow) are located. The location of the pond and agricultural features are shown detailed hatched blue below.</p> 
131, 132, 133, 136 and 137	9a	Sheet 11	<p>The Applicant has included the plots to utilise the existing access immediately adjacent to the cable corridor due to traffic safety and to avoid unnecessary removal of vegetation. This is the minimum land requirement.</p>
154	9c	Sheet 14	<p>The Applicant can confirm that access in this location is via the cable corridor. This is the minimum land requirement.</p>
224, 225 and 226	9a	Sheet 19	<p>The Applicant can confirm that the identified plots are included in the interests of traffic safety, due to reduced visibility and the proximity to a tight bend to the west on Miles Lane, Leconfield. This is the minimum land requirement.</p>
297	9c	Sheets 25 and 26	<p>The Applicant can confirm that access in this location is via the cable corridor. This is the minimum land requirement.</p>

Table 3: Action Points

Action	Description	Action by	Deadline	Applicant's Comment/where has the action been answered.
1	Statement of Need to be updated to account for the recently published Energy Security Strategy and any other new policy or guidance that may be published.	Applicant	7	Noted
2	Further written clarification to be provided to justify the inclusion of sections of land depicted in: Sheet 1; Sheet 6; Sheet 11; and Sheet 19	Applicant	3	Addressed in the document above (Table 2: Applicant's Response to Action Point 2 from the CAH).
3	To continue to work with National Grid Electricity Transmission regarding whether the amount of land being sought at Creyke Beck could be reduced.	Applicant	Ongoing	Noted
4	Request that Hotham Family Trust confirms its position regarding the completion of land agreement(s) with the Applicant.	Applicant	Position to be confirmed before the close of the Examination	Noted
5	Request that Mr and Mrs Foreman confirm their position regarding the completion of land agreement(s) with the Applicant.	Applicant	Position to be confirmed before the close of the Examination	Noted
6	Request that Mr and Mrs Goatley confirm their position regarding the completion of land agreement(s) with the Applicant. In the absence of this, confirmation from East Riding of Yorkshire Council (ERYC) that they are now the owners of the plots in question and the Book of reference and any other documents that need to, be updated to reflect this change in ownership.	Applicant	Position to be confirmed before the close of the Examination	Noted
7	Applicant to provide a statement clarifying how the Proposed Development can proceed if Crown Consent is not secured	Applicant	Position to be confirmed before the close of the Examination	Noted