



Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects

Main Construction Compound Targeted Consultation Responses

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Table of Contents

1	Section 42 Responses.....	3
2	Section 44 Responses.....	20

1 Section 42 Responses

Consultee	Comment	Development Change?	Response
Royal Mail	Royal Mail wishes to reserve its position to submit a consultation response/s at a later stage in the consenting process and to give evidence at any future Public Examination, if required.	N	Noted
UK Health Security Agency	We have assessed the submitted documentation and wish to make no further comments at this stage.	N	Noted
The Norfolk Local Access Forum	we would strongly prefer that the applications be postponed until such time as a decision has been made by the Government on the proposed coastal ring main and that all applications relating to the site should be considered at the same time rather than on a piecemeal basis.	N	Whilst Equinor is supportive of the idea of an offshore transmission network, neither the technical nor regulatory frameworks exists to incorporate an OTN into the project. The Applicant has set it's timeline for the SEP and DEP and delaying it would risk not meeting the Government's offshore wind target of 50 GW by 2030.
The Norfolk Local Access Forum	We would ask that you liaise with other projects, current and proposed, to utilise the same routes, trenches and buildings to the greatest possible extent	N	Due to legal restrictions we are not able to utilise the same trenches and buildings with other projects. We are however coordinating with other projects in the area to minimise cumulative impacts such as those on traffic.
The Norfolk Local Access Forum	Physical impact of trenches on rights of way and other access routes should be minimised	N	There will be no permanent closure to PRoW. Public Rights of Way will be maintained throughout construction. If

			a temporary closure is required a suitable diversion will be agreed in advance with the Countryside Access Officer at Norfolk County Council.
The Norfolk Local Access Forum	Impact of trenches on the appearance of land (short and long term) should be minimised	N	Following the completion of laying the cables they will be jointed and tested, after this the land will be reinstated and can return to its previous use.
The Norfolk Local Access Forum	Concern regarding the number of vehicle movements that will be involved	N	The Applicant will endeavour to keep impacts from traffic to a minimum. For full information please refer to the Outline Construction Traffic Management Plan (OCTMP) (Document reference : 9.16) which is submitted as part of the DCO application.
The Norfolk Local Access Forum	Concern regarding the width of corridor needed to drive the route	N	The width of the cable corridor within the Order limits is 60m wide for SEP and DEP (increasing to 100m at trenchless crossings). The actual working easement would be up to 38 metres (concurrent scenario) or 45 metres (sequential scenario). A haul road is included within this working easement which is 5 metre wide and increasing up to 8 metres wide at passing places.

<p>The Norfolk Local Access Forum</p>	<p>Concern regarding the enforcement of contractors to adhere to the conditions of the planning approval</p>	<p>N</p>	<p>Day-to-day activities will be firstly managed by prestart meetings held between contractor and client, each work party will have a non-working supervisor managing their individual team feeding back progress or potential issues to the senior management. We will also establish a monitoring and reporting system to ensure compliance.</p>
<p>The Norfolk Local Access Forum</p>	<p>Concern that Applicant will need to remove hedges from entire working width, not just cable width</p>	<p>N</p>	<p>The Applicant has avoided hedgerows where possible. Where hedgerows are crossed, the Applicant has committed to reducing the working width to 20m to minimise potential impacts</p>
<p>The Norfolk Local Access Forum</p>	<p>We support - the intention to tunnel rather than trench in sensitive spots close to SSSIs and would encourage applying this approach to as many locations as possible.</p>	<p>N</p>	<p>All sites designated for their nature conservation value have been avoided, where possible, during the site selection process. Where avoidance was not possible, for example at the River Wensum, alternative construction techniques have been selected to avoid impacts.</p>
<p>The Norfolk Local Access Forum</p>	<p>We would like to see every opportunity taken wherever an overland route is needed, to use them to create additional access routes, such as making extra rides through the few bits of woodland that the route crosses</p>	<p>N</p>	<p>Once the a section of a cable corridor is completed the land will be reinstated to its previous use. The Applicant has no plans to create additional access routes.</p>

<p>The Norfolk Local Access Forum</p>	<p>Create new routes whilst minimising negative impacts on bio-diversity</p>	<p>N</p>	<p>We have committed to cross all woodland habitats using trenchless crossing techniques, this will significantly reduce the impact on these habitats. As well as this commitment we will be avoiding all protected sites where possible We have also refined the PEIR boundary to exclude key ecological features such as ponds, known badger setts, and trees with bat roost potential. Equinor has also made a commitment to achieve a biodiversity net gain for the onshore elements of SEP and DEP.</p>
<p>The Norfolk Local Access Forum</p>	<p>NLAF accepts that this offshore scheme extension is a necessary part of the UK strategy to achieve net zero carbon emissions</p>	<p>N</p>	<p>Noted</p>
<p>The Norfolk Local Access Forum</p>	<p>We are fully supportive of offshore wind, but not at the expense of trashing large swathes of our countryside.</p>	<p>N</p>	<p>The Applicant is working to keep all impacts to the onshore area of the projects to a minimum. The only permanent above ground structure would be the onshore substation. All the land above the installed cables will be returned to its former use once construction is complete.</p>
<p>The Norfolk Local Access Forum</p>	<p>by way of compensation for the disruption, you establish a fund which can be used to make improvements in those areas.</p>	<p>N</p>	<p>The benefits of any community funds associated with these projects will form part of Equinor's stakeholder engagement with local communities as the projects are matured. Potential resources will be targeted at initiatives</p>

			benefiting the local communities affected by the SEP and DEP projects.
Norfolk County Council	The County Council broadly agree with the applicant's assessment, having correctly identified the Local Highway Authority's (LHA) preferred option as the brownfield Atlas Works site at Lenwade (identified as A1067 Norwich Road – site 8).	N	Noted
Norfolk County Council	The County Council agree that the LHA has not raised a highway objection to the use of the greenfield site at Attlebridge (identified as the A1067 Fakenham Road) both subject to highway improvements	N	Noted
Norfolk County Council	The County Council were unable to find any convincing evidence to support the applicant claims as to why the Lenwade site could not progress.	N	As set out in the Onshore Compound Site Selection Report (document reference 6.3.4.3) there are a variety of reasons as to why the A1067 Norwich Road was not progressed as an option: <ul style="list-style-type: none"> • Proposed new access off the A1067 not acceptable to Norfolk County Council. • Shared access (if upgraded) would lead to potential conflict with existing users of the wider site and A1067. • The internal roads from the shared access are not suitable for the size of the cable drum transporter.
Norfolk County Council	the County Council couldn't find a plan to show the size of the land at A1067 Norwich Road required in contrast to the size of land available.	N	Maps showing the potential compound locations including the site at A1067 Norwich Road can be found in the appendix of the Onshore Compound Site Selection Report (document reference 6.3.3.3)

Norfolk County Council	A significant part of the site at A1067 Norwich Road has existing warehouses which it is claimed would not be suitable for the proposed cable drum storage. It has not been made clear why the use of the warehouses is not suitable.	N	The existing warehouses were surveyed and were not considered suitable for use for the SEP and DEP works due to the layout and sizes of the buildings. Whilst the warehouses could be excluded from the working area, the presence of extensive asbestos contamination in proximity to the working area would represent a significant health and safety risk.
Norfolk County Council	The required visibility splays will impact on hedges and require hedgerow removal. This isn't shown on the submitted plans and it is recommended the District Council/Landscaping Officers satisfy themselves that any such impact is acceptable from a landscape perspective.	N	An updated drawing showing the swept path analysis is included within the Transport Assessment which is Appendix 24.1 of ES Chapter 24 Traffic and Transport (Document reference : 6.1.24).
Norfolk County Council	The County Council accept the greenfield site at the A1067 in Attlebridge is acceptable to the Highway Authority subject to access and visibility improvements.	N	Noted
Norfolk County Council	the County Council have not sought to pursue the reasons given by the applicant for discounting the Lenwade site and will leave it for others to do so if they feel it appropriate.	N	Noted
Norfolk County Council	the Lead Local Flood Authority (LLFA) note that consideration of surface water flood risk was not included in the main compound site selection process the LLFA remind the applicant that in relation to flood risk management, the National Planning Policy Framework requires consideration of all sources of flood risk.	N	As stated in Section 5 of the main compound site selection report, Flood Zones 2 and 3 were included as part of the initial constraints mapping exercise. Although it is noted that these features are not referred to again in the BRAG assessment. The main compound is located outside of Flood Zone 2 and 3 and is not located in any

			area at risk of surface water flooding. A flood risk assessment (FRA) (document reference 6.3.18.2) of the projects is included as part of the DCO application.
Norfolk County Council	the LLFA acknowledge the preferred site is not at present at risk of surface water flooding.	N	Noted
Norfolk County Council	Were this a planning submission (i.e., submission of the DCO), the LLFA would object due to lack of consideration and information in relation to surface water flood risk and management in both the selection process and the preferred site assessment.	N	The Applicant was seeking feedback on the site selection process. The main construction compound is a temporary works area and a full assessment of flood risk impacts is included within the DCO application itself and specifically in the FRA (document reference 6.3.18.2).
Norfolk County Council	further evidence of consideration of surface water flood risk and management will need to be supplied and set out in the supporting Environmental Statement (ES) as part of the submission stage of the Development Consent Order (DCO).	N	FRA (document reference 6.3.18.2) of the projects will be included as part of the DCO application.
Norfolk County Council	The report mentions that the applicant has used Historic Environment Record data in the assessment, but there is no row in the Black-Red-Amber-Green assessment spreadsheet relating to the Historic Environment Record data	N	Historic data was included in the Black-Red-Amber-Green assessment spreadsheet as 'Known Designated heritage assets'. This can be seen in the Onshore Compound Site Selection Report (document reference 6.3.3.3)
Norfolk County Council	Although option 8 has already been identified as the preferred site the Historic Environment Team have completed our own RAG assessment of all potential sites see, this sets out that Option 8 will require Archaeological/Historic Environment mitigation.	N	Option 8, A1067 Norwich Road has not been identified as the preferred site. The Applicant has progressed with 'Option 2, A1067 Fakenham Road'.

Norfolk County Council	The choice of Option 8 A1067 Norwich Road, or Atlas Works, as it is otherwise known, has an historical resonance as the site produced concrete products for the offshore sector until 1992.	N	Noted
Norfolk County Council	Having reviewed the report and preferred location the Natural Environment team has no objections in principle to the choice	N	Noted
Norfolk County Council	The team would like to highlight the adjacent County Wildlife Site (Attlebridge Hills Ref No: 1343) which immediately abuts the boundary to the south east. Along this boundary, a minimum of 10m stand-off would be required to ensure the protection of the trees	N	There is a 80 metre gap between the edge of the final DCO order limits for the Main construction compound and the County Wildlife Site.
Norfolk County Council	Consideration should also be paid to the hedges running along the two other enclosed boundaries and measures taken to ensure these are not impacted by the use of the site as a compound.	N	The final DCO order limits avoids these two field boundaries.
Norfolk County Council	Planning permission C/5/2017/5007 was granted on 20 September 2018 with a condition that the development shall commence not later than three years from the date of the permission. Therefore, the permission needed to have been implemented by 20 September 2021 which has not happened. Therefore, the permission has lapsed. The proposal was for: Change of use from B8: Warehousing to a Sui Generis use for waste processing and the production of refuse derived fuel (RDF) with an annual throughput of 150,000 tonnes; Installation of office, 2 x weighbridges and photovoltaic panels, and highway improvement scheme consisting of the major upgrade and realignment of the north western estate access with the A1067	N	Noted.

Norfolk County Council	Planning permission C/5/2015/5007 was granted on appeal on 22 August 2018 with a condition that the development shall begin no later than 3 years from the date of the decision. Therefore, the permission needed to have been implemented by 22 August 2021 which has not happened. Therefore, the permission has lapsed. The proposal was for: Resubmission of application for change of use from B8: Warehousing to a Sui Generis use for waste processing and the production of refuse derived fuel (RDF) with an annual throughput of 150,000 tonnes; installation of office, 2 x weighbridges and photovoltaic panels	N	Noted.
Norfolk County Council	The site is allocated in the adopted Norfolk Waste Site Specific Allocations DPD; however, the Minerals and Waste team have not safeguarded waste site allocations.	N	Noted.
Norfolk County Council	The site is partly within the safeguarding consultation area for the existing scrapyards which operates on part of the wider SPC Atlas Works site, however, the County Council would not expect the operations of the existing safeguarded site to be compromised by the proposed construction compound development.	N	Noted.
Norfolk County Council	Norfolk County Council, as the Waste Planning Authority for Norfolk does not have any concerns to raise about the proposal in terms of waste management facilities safeguarding.	N	Noted.
Norfolk County Council	The greenfield site at A1067 Fakenham Road, Attlebridge is not underlain by a safeguarded mineral resource	N	Noted.
Norfolk County Council	The brownfield Atlas Works site is underlain by a safeguarded sand and gravel resource.	N	Noted.
Norfolk County Council	as the proposed development would be temporary in nature (either 36 months or 72 months) it would not permanently sterilise a safeguarded mineral resource and therefore Norfolk	N	Noted.

	County Council, as the Mineral Planning Authority for Norfolk does not have any concerns to raise about the proposal in terms of mineral resource safeguarding.		
East Suffolk Council	we have no significant comments to make at this time.	N	Noted.
Great Yarmouth Borough Council	The Council has no objections to the proposed location of the Onshore Main Construction Compound, to be situated off Fakenham Road, Attlebridge as this lies outside of the Council's administrative boundary.	N	Noted.
Great Yarmouth Borough Council	the Council still wishes to reiterate its overall support for the aims and ambitions of both offshore windfarms and the opportunity that Great Yarmouth presents to offer significant opportunities in the growth of the clean energy sector	N	The Applicant welcomes the support of Great Yarmouth Borough Council.
Vattenfall Wind Power Ltd	VWPL welcomes Equinor's decision to drop the potential option at Oulton airfield and agrees with the justification for this presented in the Onshore Main Construction Compound Updated Site Selection Report.	N	Noted.
Vattenfall Wind Power Ltd	Whilst the DEP/SEP construction traffic numbers presented at PEIR on The Street are very low, VWPL would expect Equinor to demonstrate that their approach to that crossing, and use of The Street to access works either side of The Street, would not conflict with mitigation measures already secured for Norfolk Vanguard (NV) and Norfolk Boreas (NB). Specifically the introduction of passing places along The Street and a cap on the maximum number of Heavy Goods Vehicles permitted to use that route.	N	The Applicant is mindful of the commitments made by Norfolk Vanguard and Norfolk Boreas along the B1149 and B1145. The reported traffic numbers from these projects along with Hornsea Project Three have been incorporated into the traffic cumulative impact assessment, which is presented in ES Chapter 24 Traffic and Transport (Document reference : 6.1.24).

<p>Vattenfall Wind Power Ltd</p>	<p>the A1067 (the main route serving the preferred DEP/SEP main construction compound location) is also a road link for construction traffic for both NV and NB. VWPL would expect the reported NV and NB construction traffic numbers to be factored into Equinor’s assessment of cumulative traffic impacts on the A1067 as part of their application.</p>	<p>N</p>	<p>The reported traffic numbers from these projects, using the A1067, along with Hornsea Project Three have been incorporated into the traffic cumulative impact assessment, which is presented in ES Chapter 24 Traffic and Transport (Document reference : 6.1.24).</p>
<p>Vattenfall Wind Power Ltd</p>	<p>Whilst there are no changes to the DEP/SEP boundary VWPL would like to reiterate the comments made on Equinor’s PEIR documentation relating to the overlap of the DEP/SEP PEIR boundary and construction accesses required by NV/NB. One access is required to undertake a trenchless crossing of the B1149 for NV/NB and represents the only means of access to the east of the B1149 to undertake the trenchless crossing outside of the wider duct installation programme. The other access is near the junction of The Street and Heydon Road which is required to access the NV/NB cable logistics area. Both accesses are also required for cable pulling operations for NV/NB post duct installation. VWPL therefore require assurances that the proposed routing of the DEP/SEP cables would not impact the construction programmes for either NV or NB; both at these construction accesses and across the onshore cable route.</p>	<p>N</p>	<p>The Applicant will work with Vattenfall during the construction of these projects to programme works to ensure that there is no conflict with the Norfolk Vanguard and Norfolk Boreas construction.</p>
<p>Suffolk County Council</p>	<p>If the location of the port serving the project (onshore and offshore) is located within Suffolk it must be explored to whether this use of a port for this project exceeds that permitted by existing planning permissions and is of a significant scale, we would expect a port transport assessment</p>	<p>N</p>	<p>Noted</p>

	<p>/ travel plan. If the port were in Suffolk ie Lowestoft we would expect that SCC would be consulted on this matter.</p>		
<p>Orsted</p>	<p>A preliminary concept layout for access to the Equinor compound is shown via the A1067 / Old Fakenham Road (Onshore Main Construction Compound Updated Site Selection Report). The proposal notes a reduction in the current speed limit to accommodate a substandard access arrangement with a limited staggered junction arrangement. The speed limit is planned to be reduced to 30mph which is welcomed. However, it is not evident that consideration has been given to the movement of Hornsea Three’s construction traffic / cable drum abnormal loads along the A1067 / Old Fakenham Road as proposed via link 189 / 108 within the Hornsea Three approved DCO certified Outline CTMP1. The concept access, as currently depicted, would not accommodate the abnormal load access requirements of Hornsea Three.</p>	<p>N</p>	<p>An updated drawing showing the swept path analysis is included within the Transport Assessment which is Appendix 24.1 of ES Chapter 24 Traffic and Transport (Document reference : 6.1.24).</p>
<p>Orsted</p>	<p>As stated, both the A1067 and Old Fakenham Road will accommodate traffic generated by Hornsea Three, which could add an additional 102 traffic movements per day to links 189 and 108, of which up to 80 could be HGVs. Further discussion on the potential for cumulative impact of Equinor and Hornsea Three traffic is welcomed to fully understand and manage any potential effects should both projects be in construction at the same time.</p>	<p>N</p>	<p>The Applicant will continue to engage with Ørsted to ensure that the cumulative impacts of the Projects traffic and Hornsea Three are mitigated. The reported traffic numbers from the Hornsea Three project along have been incorporated into the traffic cumulative impact assessment, which is presented in ES Chapter 24 Traffic and Transport (Document reference : 6.1.24). Our Outline Construction</p>

			Traffic Management Plan (Document reference : 9.16) is included as part of the DCO application.
Cadent gas	<p>Cadent has identified the following apparatus within the redline boundary or within the vicinity of the proposed works:</p> <ul style="list-style-type: none"> ▪ High Pressure (above 2 bar) Gas Pipelines and associated equipment ▪ Intermediate Pressure (above 2 bar) Gas Pipelines and associated equipment ▪ Medium Pressure and Low Pressure mains and associated equipment ▪ Above Ground Installation (AGI) 	N	Noted.
Cadent gas	Please note that Cadent has existing easements for these pipelines which prevents the erection of permanent / temporary buildings/structures, change to existing ground levels or storage of materials etc within the easement strip.	N	Noted.
Cadent gas	Where diversions of apparatus are required to facilitate the scheme, Cadent will require adequate notice and discussions should be started at the earliest opportunity. Please be aware that diversions for high pressure apparatus can take in excess of two years to plan and procure materials.	N	The Applicant will provide adequate notice to Cadent where diversions of apparatus are required to facilitate the scheme.
Cadent gas	Where diversions of apparatus are required to facilitate the scheme, Cadent will require the party requesting the diversion works to obtain any necessary planning permissions and other consents to enable the diversion works to be carried out. Details of these consents should be agreed in writing with Cadent before any applications are made. Cadent would ordinarily require a minimum of C4/Conceptual Design study to	N	The Applicant will obtain any necessary planning permissions and other consents to enable the diversion works to be carried out.

	have been carried out to establish an appropriate diversion route ahead of any application being made.		
Cadent gas	Where diversions sit outside the highway boundary the party requesting the diversion will be responsible for obtaining at their cost and granting to Cadent the necessary land rights, on Cadent's standard terms, to allow the construction, maintenance and access of the diverted apparatus. As such adequate land rights must be granted to Cadent (e.g. following the exercise of compulsory powers to acquire such rights included within the DCO) to enable works to proceed, to Cadent's satisfaction. Cadent's approval to the land rights powers included in the DCO prior to submission is strongly recommended to avoid later substantive objection to the DCO. Land rights will be required to be obtained prior to construction and commissioning of any diverted apparatus, in order to avoid any delays to the project's timescales. A diversion agreement may be required addressing responsibility for works, timescales, expenses and indemnity.		The Applicant is committed to ongoing engagement with Cadent and if required will seek to agree Protective Provisions for inclusion in the Development Consent Order in order to protect Cadent's apparatus.
Cadent gas	Cadent has a Deed of Grant of Easement for each pipeline, which prevents the erection of permanent /temporary buildings/structures, change to existing ground levels or storage of materials etc within the easement strip.	N	Noted.
Cadent gas	Please be aware that written permission is required before any works commence within the Cadent easement strip and a Crossing Agreement may be required if any apparatus needs to cross the Cadent easement strip	N	Noted. The Applicant is committed to ongoing engagement with Cadent.

Cadent gas	You should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Dangerfrom Underground Services", and Cadent's specification for Safe Working in the Vicinity of Cadent High Pressure gas pipelines and associated installations - requirements for third parties GD/SP/SSW22. Digsafe leaflet Excavating Safely - Avoiding injury when working near gas pipes. There will be additional requirements dictated by Cadent's plant protection team	N	Noted. The Applicant is committed to ongoing engagement with Cadent.
Cadent gas	Cadent will also need to ensure that our pipelines remain accessible throughout and after completion of the works .	N	Noted. The Applicant is committed to ongoing engagement with Cadent.
Cadent gas	The actual depth and position must be confirmed on site by trial hole investigation under the supervision of a Cadent representative. Ground cover above our pipelines should not be reduced or increased.	N	Noted. The Applicant is committed to ongoing engagement with Cadent.
Cadent gas	If any excavations are planned within 3 metres of Cadent High Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), or if any embankment or dredging works are proposed then the actual position and depth of the pipeline must be established on site in the presence of a Cadent representative. A safe working method agreed prior to any work taking place in order to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.	N	Noted. The Applicant is committed to ongoing engagement with Cadent.
Cadent gas	Trenchless techniques and tree planting schemes have specific restrictions when being undertaken in the vicinity of gas assets therefore consultation with Cadent's Plant Protection team is essential	N	Noted. The Applicant is committed to ongoing engagement with Cadent.
Cadent gas	Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at agreed locations.	N	Noted.

Cadent gas	The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required.	N	Noted.
Cadent gas	The type of raft shall be agreed with Cadent prior to installation.	N	Noted.
Cadent gas	No protective measures including the installation of concrete slab protection shall be installed over or near to the Cadent pipeline without the prior permission of Cadent	N	Noted.
Cadent gas	Cadent will need to agree the material, the dimensions and method of installation of the proposed protective measure.	N	Noted.
Cadent gas	The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to Cadent.	N	Noted.
Cadent gas	A Cadent representative shall monitor any works within close proximity to the pipeline.	N	Noted.
Cadent gas	New services may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.	N	Noted.
Cadent gas	Where a new service is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres.	N	Noted.
Cadent gas	A new service should not be laid parallel within an easement strip	N	Noted.
Cadent gas	A Cadent representative shall approve and supervise any new service crossing of a pipeline.	N	Noted.
Cadent gas	An exposed pipeline should be suitable supported and removed prior to backfilling	N	Noted.

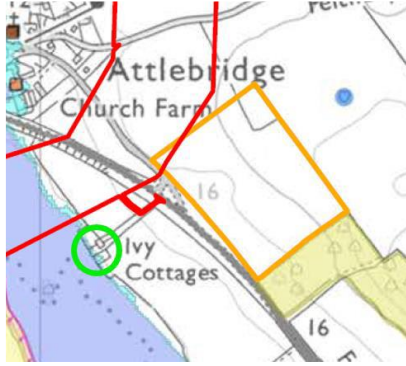
Cadent gas	An exposed pipeline should be protected by matting and suitable timber cladding	N	Noted.
Cadent gas	For pipe construction involving deep excavation (<1.5m) in the vicinity of grey iron mains, the model consultative procedure will apply therefore an integrity assessment must be conducted to confirm if diversion is required		Noted.
Norfolk Wildlife trust	Recommend: Full breeding bird surveys of proposed site, to establish the full range of ground nesting bird species and territory numbers.	N	An ecological survey was undertaken for the Fakenham Road site, and no protected species or protected habitats were identified. The field where the compound is proposed does however contain skylark territories and appropriate mitigation for breeding birds has been proposed.
Norfolk Wildlife trust	Recommend: Mitigation/compensation measures for bird species displaced through loss of nesting habitat in-field (for example skylark) and any hedgerow nesting species displaced through the inevitable disturbance. The mitigation should also be secured in advance of the establishment of the Construction Compound	N	Mitigation measures for the nesting birds is set out in the Outline Ecological Management Plan (Document reference 9.19)
Norfolk Wildlife trust	<ul style="list-style-type: none"> The proposed compound site is immediately adjacent to Attlebridge Hills County Wildlife Site, designated for its semi-natural broadleaf woodland habitat with woodland ground flora. No details are available at present regarding the likely layout of the site compound, but we recommend a suitable stand-off distance and fencing between compound buildings/machinery and the woodland edge to avoid any impacts on the woodland from noise and light pollution and human disturbance. 	N	There is a 80 metre gap between the edge of the DCO order limits for the Main construction compound and the County Wildlife Site. Measures to mitigate the impact of light and noise pollution are set out in d the Outline Ecological Management Plan (Document reference 9.19)

2 Section 44 Responses

Stakeholder	Comment	Development change?	Response
Jane Kenny on behalf of Mrs J Dacre	My client is the landowner for the area Equinor has identified for the main compound. She has always been very clear that she did not want the compound on her land	N	Equinor appreciates Mrs Dacre’s position on the matter however through the technical and environmental assessments as set out in the Main Construction Compound Updated Site Selection Report it was decided that the A1067 at Attlebridge is the most suitable site for the compound.
Jane Kenny on behalf of Mrs J Dacre	My client does not want the compound sited on the Fakenham Road due to the cumulative impact of the already programmed Hornsea 3 project, the construction of the Norwich Western Link and A47, all of which will be happening in a similar timeframe, together with laying of the Equinor cable are going to have a significant impact on the village Attlebridge and local vicinity.	N	The potential overlap of the construction of SEP and DEP plus Hornsea Project Three and Norfolk Vanguard / Boreas, is recognised throughout the site selection reports in relation to potential cumulative impacts. The site selection exercise sought to identify those main compound options with a comparatively higher or lower risk of cumulative impacts with these other projects. The site options at Oulton Airfield and Cawston had a comparatively higher risk of cumulative impacts with both Hornsea Project Three and the Norfolk Vanguard and Boreas Projects (Noting the location of the Hornsea Project Three main compound is Oulton airfield and the

		<p>associated forecast intensity of construction traffic movements induced in the vicinity).</p> <p>At the time of preparing the site selection reports and the DCO application, the timescales for the Norwich Western Link (NWL) were less certain and to date, no planning application has been submitted. It was therefore not possible to undertake a detailed appraisal of cumulative impacts. Notwithstanding this, it was noted that completion of the Norwich Western Link prior to the start of SEP and DEP would be of benefit to traffic access to the main compound.</p> <p>The uncertainties relating to the NWL construction programme and potential cumulative impacts, are addressed through the submission of a Construction Traffic Management Plan (CTMP) prior to start of construction of SEP and DEP. The CTMP will set out the measures to be employed by the contractor to ensure that any cumulative impacts with other 'live' projects are not significant.</p>
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			<p>This will include communication strategies, traffic management, monitoring and enforcement.</p> <p>An outline CTMP is included with the DCO application which will set the standards required of the contractor the production of a finalised CTMP will be secured by DCO Requirement (planning obligation).</p>
Jane Kenny on behalf of Mrs J Dacre	<p>Hosting the compound is expected to be for a minimum of 3 years but could be for up to 8 years, not 7 years as reported in the Preliminary Environmental Impact Report, which will exacerbate an already difficult situation.</p>	N	<p>The programme has extended slightly since that reported in the Preliminary Environmental Impact Report. This has been taken into account in the various assessments that have been undertaken to support the planning application, including impacts related to the use of the main compound.</p> <p>However, it should be noted that onshore construction would be complete within 3 year (single project or concurrent construction) or 7 year (sequential construction) timeframes. The final year of construction (either year 4 in the single or concurrent scenarios, or year 8 in the sequential scenario) in the overall programme is limited to offshore activities.</p>
Jane Kenny on behalf of Mrs J Dacre	<p>Having reviewed the Onshore Main Construction Compound Updated Site Selection Report dated November 2021 and the Additional Environmental Information dated November 2021 there is concern on the accuracy of some of the detail and</p>	N	<p>The Applicant submits a detailed response to all issues raised below.</p>

	<p>interpretation of the data which has been the basis for determining the Fakenham Road site as the main compound.</p>		
<p>Jane Kenny on behalf of Mrs J Dacre</p>	<p>It is noted that the closest residential property is 200m from the compound. It would appear there is a least one property within 200m.</p>	<p>N</p>	<p>The nearest property is Ivy Cottages, located to the west of the A1067, and shown by the green circle on the image below.</p>
<p>Jane Kenny on behalf of Mrs J Dacre</p>	<p>There has been no consideration to the density of residential properties in the area. There are more than 50 properties in Attlebridge, with 30 plus within 500m of the compound compared to approximately only 20 at the East Cawston site</p>	<p>N</p>	<p>This property is located 200m from the proposed main compound location (orange polygon in image below). The next nearest properties are in Attlebridge, to the northwest of the proposed compound, which are located approximately 230m away. For context the mapping below is based on the cable corridor, as presented within the Preliminary Environmental Information Report, which was 200m wide at that time.</p>  <p>The distance to the nearest properties sought to compare the available options in relation to relatively lower or higher risk of construction noise</p>

			impacts. Properties beyond 200m are at a lower risk of experiencing construction noise impacts compared to properties within 100m. A full noise impact assessment is provided in ES Chapter 23 Noise and Vibration .
Jane Kenny on behalf of Mrs J Dacre	There is mention within the report to the proposed schemes in the area. Orsted with Hornsea 3 Project, Norwich Western Link and the dualling of the A47. The BRAG states 'no obvious cumulative risks' with other projects. All of these projects are within the location of the proposed main compound and programmed to commence at a similar time as Equinor's SEP and DEP projects. These schemes will have a considerable impact on the area surrounding A1067 Fakenham Road site and the NCC stated the proposed location is close to the Norwich Western Link and needs to be taken into consideration when assessing the site. It would appear no consideration has been made.	N	The main mechanism for cumulative impacts with these other projects is related to traffic with all projects potentially taking place at the same time and using the same parts of the road network. The BRAG assessment considered potential for cumulative traffic impacts as a specific category of the BRAG assessment
Jane Kenny on behalf of Mrs J Dacre	It is noted from the 'considerations', of the BRAG, it is whether the road is generally wide enough for 2 vehicles. Both roads are wide enough for two vehicles. The Old Fakenham Road which is the road off the A1067 is not wider enough to accommodate two-way HGV movements	N	The proposed location of the main compound is close to the junction with the A1067 where the width of Old Fakenham Road is wide enough to allow to HGVs to pass.
Jane Kenny on behalf of Mrs J Dacre	It is noted that further land may be required to ensure appropriate junction spacing. Landowners have been consulted in this regard.	N	The Applicant has developed an outline design for the proposed main compound access including the junction with the A1067. The design incorporates minor amendments to the junction geometry in the area. The

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Applicant is confident the access and any associated amendments to public highway can be accommodated within the order limits and existing public highway. The Applicant can confirm that all landowners in this area have been consulted. Following our land referencing and due diligence checks all identified parties have been consulted with.

The design of the main compound access and junction with the A1067 has been checked using swept path analysis software (which simulates the path that would be taken by vehicles). The outline design and swept path analysis drawings have been shared with Norfolk County Council (NCC) as the local highway authority, and NCC have provided in principle support for the proposed access designs. Final details of the proposed access design and amendments to the junction with the A1067 are included within the Transport Assessment which is Appendix 24.1 of **ES Chapter 24 Traffic and Transport** (Document reference : 6.1.24)..

<p>Jane Kenny on behalf of Mrs J Dacre</p>	<p>It is stated traffic will be directed to the A1067 to prevent them going through the village. How is it proposed to ensure that traffic does not go through the village of Attlebridge when it is stated it will be 'inevitable' traffic would go through the village of Cawston?</p>	<p>N</p>	<p>The Applicant has made a commitment to route HGVs to the main compound via the A1067 only, i.e., no HGVs will route through Attlebridge itself. This commitment is captured within the outline Construction Traffic Management Plan (CTMP) that has been submitted with the DCO application (document reference 9.16). The outline CTMP sets the standards for the contractor to adopt and outlines the types of measures that will be adopted to ensure HGVs use the designated delivery routes These will include, advanced direction signing, providing drivers and suppliers with delivery instructions and monitoring and enforcement strategies for non-compliance.</p> <p>The outline design for the main compound access has been developed with a reduced junction radius to restrict traffic movements from and towards Attlebridge. Furthermore, following consultation, the design has also been further amended to incorporate signage to advise of no right turns from the proposed main compound.</p>
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			<p>The outline CTMP will form the basis of a final CTMP to be developed and approved by the local planning authority in the pre-construction phase.</p> <p>With reference to Cawston, the comment was made in relation to the potential for cumulative impacts. Both Norfolk Boreas and Norfolk Vanguard would result in significant increases in traffic through the village of Cawston. Whilst similar controls on HGV movements (as proposed for Attlebridge) could be adopted, controls on employee vehicle movements are harder to enforce and it was considered that some employee traffic would also travel through Cawston. It was therefore assessed that this additional traffic would further exacerbate the potential cumulative issues at this village.</p>
<p>Jane Kenny on behalf of Mrs J Dacre</p>	<p>The report states there are no collision clusters identified. Further exploration has identified the following information. The below map (Can be found in response) which shows all the collisions within the area was produced by WSP on behalf of the NCC. The subject property is circled black.</p>	<p>N</p>	<p>A review of collision clusters was undertaken for the BRAG assessment using the latest publicly available collision data from [REDACTED]. The BRAG defined a collision cluster as more than three collisions. It can be observed from this data source that there has been only one 'slight' injury collision at</p>

			the junction of Old Fakenham Road and the A1067 in the last five years.
	<p>East Cawston Site: The report states the site is located in excess of 20km from the middle point along the corridor. It also states RAF Oulton site is within 10km of the middle point of the cable corridor. East of Cawston site is approximately 3 km from RAF Oulton site. Please can you confirm these distances are correct as we believe the East Cawston site is closer to the midpoint than RAF Oulton.</p>	N	<p>This is an error in Appendix 2. Both sites are within 10km of the mid-point (with East of Cawston slightly closer) and are correctly identified as green in the scoring table.</p> <p>The error in the appendix has been corrected in the versions submitted with the DCO application. As this was not an error in the scoring table it does not change the overall findings presented in the site selection report.</p>
Jane Kenny on behalf of Mrs J Dacre	<p>The distance [of the East of Cawston site] from the nearest residential property would be subject to where the compound was sited within the field. It is not clear how the distance has been calculated. The western field identified is approximately 11 hectares and the field to the east of the A1149 is approximately 5 hectares. The area required for the compound is 6 hectares. It is considered there would be suitable space to create the main compound at this location whilst maintaining suitable distances from residential properties. This is on the basis of using both fields.</p>	N	<p>The distance assumed that the compound could be positioned anywhere within the identified fields and acknowledging that there are several properties adjacent to these fields. Spreading the compound across both plots and maximising the distance would position the compound approximately 75m from the nearest properties, which would still score as red.</p>
Jane Kenny on behalf of Mrs J Dacre	<p>East Cawston site: The number and density of the residential properties in the vicinity also needs to be considered in conjunction with distance from the compound. It can't be right that this not a consideration when assessing the suitability of a site.</p>	N	<p>The distance to the nearest properties sought to compare the available options in relation to relatively lower or higher risk of construction noise impacts. Properties beyond 200m are at a lower risk of experiencing</p>

			<p>construction noise impacts compared to properties within 100m. The impact assessment focusses on whether there is a potential impact or not.</p>
<p>Jane Kenny on behalf of Mrs J Dacre</p>	<p>East Cawston site: The access into both of these fields is directly off the roundabout. The report states the access has to be off B1149 and the B1145 and that NCC has previous rejected an application off the B1149 in proximity to the site for a new access onto the road for a compound, whereas these sites benefit from an existing access directly off the roundabout. The previous application was approximately 4km away and didn't have the benefit of the roundabout. Without NCC opinion how can Equinor be confident that this is correct?</p>	<p>N</p>	<p>The Applicant accepts that there are existing accesses to the East Cawston sites. These accesses are however, substandard and comprise of small 'field' accesses. These field accesses were therefore discounted as being suitable as a means of access and egress from the roundabout for SEP and DEP construction traffic. The BRAG therefore considered that a new access would need to be constructed from either the B1149 or B1145 away from the existing roundabout. BRAG assessment for transport however provides a 'Green' score for access to the East of Cawston site, noting that: <i>"Both locations [B1149 or B1145] are considered feasible but would require some localised vegetation clearance to accommodate visibility"</i>. This score was based upon there being no geometric highway constraints to providing access from this location. However, when considering the parameter of land and 'planning risk' in the BRAG, consideration was given to NCCs previous position to reject an</p>

			<p>application for a large construction compound to take a new access off the B1149 in proximity to this site. When considering the parameters of planning risk, NCC previous refusal on highway grounds is a significant material consideration. Through dialog with NCC on SEP and DEP, NCC have reiterated this position in relation to access from the B1149.</p>
Jane Kenny on behalf of Mrs J Dacre	<p>East Cawston site: It is noted that the access strategy would involve the routing of traffic on the B1145 to the A140 and there are potential pinch points. An alternative route would be to travel south on the Holt Road and take the Buxton Road, east, which is a virtually straight road to the A140 which also means that the vehicles would avoid the suburbs of the market town of Aylsham and the village of Marsham.</p>	N	<p>To the eastern end of Buxton Road (close to the A140), the road is not wide enough for two vehicles to pass and passing places are provided. To the western end of Buxton Road (close to the B1149) the road is does not have a centre line and therefore would (in accordance with UK road markings regulations) be less than 5.5m in width. Typically roads less than 5.5m in width cannot accommodate two-way HGV traffic movements, without overrunning of the adjacent verges, and this can be evidenced along Buxton Road. The use of this alternative suggested route would therefore not influence the conclusions of the BRAG.</p>
Jane Kenny on behalf of Mrs J Dacre	<p>East Cawston Site: It is noted that it is 'inevitable' traffic would go through Cawston' resulting in a high concentration of sensitive receptors. If Equinor are able to direct traffic to avoid</p>	N	<p>With reference to Cawston, this comment is made in relation to the potential for cumulative impacts. Both Norfolk Boreas and Norfolk Vanguard</p>

	<p>going through the village of Attlebridge can the same principle be applied here?</p>		<p>would result in significant increases in traffic through the village of Cawston. Whilst similar controls on HGV movements (as proposed for Attlebridge) could be adopted, controls on employee vehicle movements are harder to enforce and it was considered that some employee traffic would also travel through Cawston. It was therefore assessed that this additional traffic would further exacerbate the potential cumulative issues at this village.</p>
<p>Jane Kenny on behalf of Mrs J Dacre</p>	<p>The land to the west and east of the B1149 is owned by the same landowner who is willing to host the main compound.</p>	<p>N</p>	<p>Equinor appreciates that the landowner at this site is willing to host the main construction compound however following technical and environmental assessments it was found that this site was not suitable.</p> <p>A BRAG (Black-Red-Amber-Green) assessment was used when assessing the eight compound site options and the East Cawston location ranked sixth.</p> <p>Whilst it is well positioned from an engineering point of view, the sites scored poorly when considering traffic and transport together with the risk of</p>

			<p>cumulative impacts on local communities.</p> <p>In respective of cumulative impacts, Hornsea Three, Vanguard and Boreas are all present in this area where there are construction traffic caps placed on each of the projects for main of the roads serving these communities.</p> <p>From a traffic and transport perspective, East Cawston scored lower than other sites in relation to sensitive receptors. Whilst these sites are located on the B1149 which has few sensitive receptors, they are located on the junction with the B1145 at Cawston which is a route with sensitive receptors thus impacting the assessment.</p>
<p>Jane Kenny on behalf of Mrs J Dacre</p>	<p>It is also noted RAF Oulton site was acceptable but was dismissed because the site was not available due to Orsted's occupation. RAF Oulton offers a hard standing however neither the Fakenham Road site nor East Cawston offer hard standing. The Oulton site has all the same considerations at the East Cawston site as it is necessary to pass East Cawston site to reach the RAF Oulton site. Therefore, it cannot be understood how RAF Oulton site is more preferable than East Cawston?</p>	<p>N</p>	<p>The criteria used to compare the sites is set out in the Main Compound Site Selection Report. This has sought to transparently show what those differences. The main areas where RAF Oulton scored higher than the East of Cawston Site were: existing hard standing, existing services and distance to nearest properties. These</p>

			were all red for the East of Cawston site and green for RAF Oulton.
Jane Kenny on behalf of Mrs J Dacre	The BRAG assessment refers to the East Cawston site being in proximity to the village of Cawston and RAF Oulton. East Cawston site is situated approximately 2km from the village of Cawston and 3km respectively from the RAF Oulton site. Stating 'proximity' is ambiguous and confusing in its use in respect of this site.	N	The BRAG assessment states the following in relation to the East of Cawston site " <i>Whilst DEP and SEP commit to not routing traffic through Cawston, the proximity of this site to Cawston would inevitably risk traffic periodically routing through Cawston</i> ". Proximity is simply used to describe something's nearness.
Jane Kenny on behalf of Mrs J Dacre	It would appear there are several uncertainties/inaccuracies within the BRAG assessment spreadsheet which require further examination and assessment. This could result in the BRAG summary findings assessment score being altered and resulting in a change in the ranking for the East Cawston site. The amendments could result in the site moving up the rankings and consequently been taken forward for consideration and evaluation.	N	As set out within our responses throughout this table we believe we have responded to you and explained our queries and why we remain confident in the findings set out in the BRAG assessment.
Jane Kenny on behalf of Mrs J Dacre	There is the Attlebridge Montessori Nursery School which has vehicles visiting the site all day dropping and picking children up from school.	N	The proposed main compound would be located to the east of the Nursery School. As such, no HGV traffic would be required to pass through this site.
Jane Kenny on behalf of Mrs J Dacre	There has been no consideration to the use and location of the J Riley commercial business units which include 6 business as well as J Riley Harvesters (UK) Ltd. The vehicle movements into the site need to be considered. J Riley Harvesters have approx. 25 HGV/ low loaders on a daily basis, together with vans and staff vehicles as do the different business units.	N	To inform the DCO application, the Applicant has captured baseline traffic flow information along Old Fakenham Road. This includes details of total and HGV traffic volumes along the road. This information has been used by the Applicant to inform the assessment of

			<p>construction traffic impacts presented within the DCO application.</p>
<p>Jane Kenny on behalf of Mrs J Dacre</p>	<p>The main construction compound will be housing a lot of material and machinery which will attract and become a target area for theft. What provision will there be to protect the security of surrounding properties?</p>	<p>N</p>	<p>Securing the perimeter of the site compound is a crucial part of construction site security. However, fences can be cut or jumped and gates can be tampered with. For this reason, it's important to have a second layer of security in place.</p> <p>Security outside of working hours will either be physical security which entails a security guard in attendance patrolling at regular intervals and/or an embedding robust security which supports the infrastructure of the site. This means installing measures such as CCTV, alarm systems and signage including highly visible systems which offer remote monitoring and recording both as deterrent and quick alert for the security to attend.</p> <p>Improved lighting such as focused lighting on entrances, equipment, machinery or other valuable items.</p> <p>A crucial part of protecting the site is to have a plan. It is important to officially lay out what our contractor will do to prevent theft, vandalism, injuries, and other incidents.</p>

		<p>For instance, the contractor shall ensure that tools are always placed inside a locked containers when they are not being used. This will be clearly stated in the plan and this plan shall be in writing and posted in a visible location.</p> <p>It is also critical that everyone on the site understands the plan and buys into the process. Making sure that the teams understand the importance of security and following the correct protocols. They will also need to know how important it is to report any security threats or incidents.</p> <p>Fuel storage will be locked at all times.</p> <p>Excavators, Dumpers, Telehandler etc will be locked including an isolation key and fitted with trackers.</p> <p>Every item of equipment will have a serial number, license plate, or other identifying feature that will be registered.</p>
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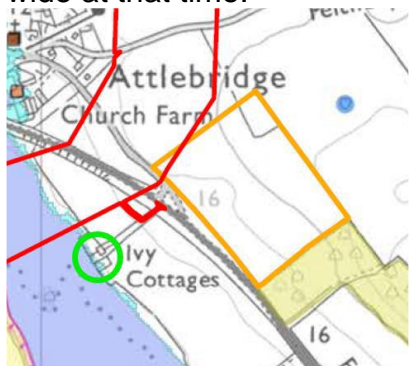
			<p>Site welfare will be fitted with vandal guards to all windows and locked outside of working hours. During working hours the gatehouse at the entrance to the site will be manned with a sign in and out procedure.</p>
<p>Jane Kenny on behalf of Mrs J Dacre</p>	<p>The report states that A1067 Norwich Road site was not sufficiently large enough to support the needs of the main compound being only 2.63 hectares when 6 hectares was required. In addition, there were already well-known environmental issues. Why was the A1067 Norwich Road site included within the Site Selection Report when it didn't fulfil key criteria let alone being selected as one of the two remaining options following further evaluation. However, this site was never going to be stand alone and would require the A1067 Fakenham Road to supplement the lack of space therefore the assessment of the A1067 Norwich Road has prejudiced the current favoured site.</p>	<p>N</p>	<p>The A1067 Norwich Road site was included as whilst it was too small to deliver all requirements it could reduce the footprint of an alternative greenfield site.</p> <p>The top four sites were taken forward for further consideration. Two of those sites RAF Oulton and Woodforde Farm had issues that could not be resolved and were discounted. Leaving the A1067 Norwich Road and A1067 Fakenham Road. Various options were considered to try combine the two options, but ultimately following further surveys at the A1067 Norwich Road site this too was dropped due to historic contamination and highway improvements that the highway authority would not accept. Including the A1067 Norwich Road site did not prejudice the exercise. It was a genuine option that was only discounted once detailed surveys and</p>

			engagement with the local highway authority were completed.
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Stakeholder	Comment	Development Change?	Response
Jane Kenny on Behalf of Mr J Riley & TM Trustees	The cumulative impact of the already programmed Hornsea 3 project, the construction of the Norwich Western Link and A47, all of which will be happening in a similar timeframe, together with laying of the Equinor cable are going to have a significant impact on the village Attlebridge and local vicinity.	N	<p>The potential overlap of the construction of SEP and DEP plus Hornsea Project Three and Norfolk Vanguard / Boreas is recognised throughout the site selection reports in relation to potential cumulative impacts. The site selection exercise sought to identify those main compound options with a comparatively higher or lower risk of cumulative impacts with these other projects. The site options at Oulton Airfield and Cawston had a comparatively higher risk of cumulative impacts with both Hornsea Project Three and the Norfolk Vanguard and Boreas Projects (Noting the location of the Hornsea Project Three main compound is Oulton airfield and the associated forecast intensity of construction traffic movements induced in the vicinity).</p> <p>At the time of preparing the site selection reports and the DCO</p>

		<p>application, the timescales for the Norwich Western Link (NWL) were less certain and no planning application has been submitted to date. It was therefore not possible to undertake a detailed appraisal of cumulative impacts. Notwithstanding this, it was noted that completion of the Norwich Western Link prior to the start of SEP and DEP would be of benefit to traffic access to the main compound.</p> <p>The uncertainties relating to the NWL construction programme and potential cumulative impacts will be addressed through the submission of a Construction Traffic Management Plan (CTMP) prior to start of construction of SEP and DEP. The CTMP will set out the measures to be employed by the contractor to ensure that any cumulative impacts with other 'live' projects are not significant. This will include communication strategies, traffic management, monitoring and enforcement.</p> <p>An outline CTMP is included with the DCO application which sets the standards required of the contractor in the production of a final CTMP.</p>
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Jane Kenny on Behalf of Mr J Riley & TM Trustees	There is concern on the accuracy of some of the detail and interpretation of the data which has been the basis for determining the Fakenham Road site as the main compound.	N	The Applicant submits a detailed response to all issues raised below.
Jane Kenny on Behalf of Mr J Riley & TM Trustees	Hosting the compound is expected to be for a minimum of 3 years but could be for up to 8 years, not 7 years as reported in the Preliminary Environmental Impact Report, which will exacerbate an already difficult situation.	N	The programme has extended slightly since that reported in the Preliminary Environmental Impact Report. This has been taken into account in the various assessments that have been undertaken to support the planning application, including impacts related to the use of the main compound. However, it should be noted that onshore construction would be complete within 3 year (single project or concurrent construction) or 7 year (sequential construction) timeframes. The final year of construction (either year 4 in the single or concurrent scenarios, or year 8 in the sequential scenario) in the overall programme is limited to offshore activities.
Jane Kenny on Behalf of Mr J Riley & TM Trustees	It is noted that the closest residential property is 200m from the compound. It would appear there is a least one property within 200m from the compound.	N	The nearest property is Ivy Cottages, located to the west of the A1067 and shown by the green circle on the image below. This property is located 200m from the proposed main compound location (orange polygon in image below). The next nearest properties are in Attlebridge, to the northwest of the proposed compound, which are
Jane Kenny on Behalf of Mr J Riley & TM Trustees	There has been no consideration to the density of residential properties in the area. There are more than 50 properties in Attlebridge, with 30 plus within 500m of the compound compared to approximately only 20 at the East Cawston site	N	

			<p>located approximately 230m away. For context the mapping below is based on the cable corridor, as presented within the Preliminary Environmental Information Report, which was 200m wide at that time.</p>  <p>The distance to the nearest properties sought to compare the available options in relation to relatively lower or higher risk of construction noise impacts. Properties beyond 200m are at a lower risk of experiencing construction noise impacts compared to properties within 100m. A full noise impact assessment of the preferred main compound form part of the DCO application.</p>
<p>Jane Kenny on Behalf of Mr J Riley & TM Trustees</p>	<p>There is mention within the report to the proposed schemes in the area. Orsted with Hornsea 3 Project, Norwich Western Link and the dualling of the A47. All of these projects are within the location of the proposed main compound and programmed to</p>	<p>N</p>	<p>The main mechanism for cumulative impacts with these other projects is related to traffic with all projects potentially taking place at the same</p>

	<p>commence at a similar time as Equinor’s SEP and DEP projects. These schemes will have a considerable impact on the area surrounding A1067 Fakenham Road site and the NCC stated the proposed location is close to the Norwich Western Link and needs to be taken into consideration when assessing the site. It would appear no consideration has been made.</p>		<p>time and using the same parts of the road network. The BRAG assessment considered potential for cumulative traffic impacts as a specific category of the BRAG assessment</p>
<p>Jane Kenny on Behalf of Mr J Riley & TM Trustees</p>	<p>It is noted from the ‘considerations’, of the BRAG, it is whether the road is generally wide enough for 2 vehicles. Both roads are wide enough for two vehicles. The Old Fakenham Road which is the road off the A1067 is not wide enough to accommodate two-way HGV movements</p>	<p>N</p>	<p>The proposed location of the main compound is close to the junction with the A1067 where the width of Old Fakenham Road is wide enough to allow to HGVs to pass.</p>
<p>Jane Kenny on Behalf of Mr J Riley & TM Trustees</p>	<p>It is noted that further land may be required to ensure appropriate junction spacing. Landowners have been consulted in this regard.</p>	<p>N</p>	<p>The Applicant has developed an outline design for the proposed main compound access including the junction with the A1067. The design incorporates minor amendments to the junction geometry in the area. The Applicant is confident the access and any associated amendments to public highway can be accommodated within the order limits and existing public highway. The Applicant can confirm that all landowners in this area have been consulted. Following our land referencing and due diligence checks all identified parties have been consulted with. The design of the main compound access and junction with the A1067 has been checked using swept path</p>

			<p>analysis software (which simulates the path that would be taken by vehicles). The outline design and swept path analysis drawings have been shared with Norfolk County Council (NCC) as the local highway authority, and NCC have provided in principle support for the proposed access designs. Final details of the proposed access design and amendments to the junction with the A1067 are included within the Transport Assessment which is Appendix 24.1 of ES Chapter 24 Traffic and Transport (Document reference : 6.1.24).</p>
<p>Jane Kenny on Behalf of Mr J Riley & TM Trustees</p>	<p>It is stated traffic will be directed to the A1067 to prevent them going through the village. How is it proposed to ensure that traffic does not go through the village of Attlebridge when it is stated it will be 'inevitable' traffic would go through the village of Cawston?</p>	<p>N</p>	<p>The Applicant has made a commitment to route HGVs to the main compound via the A1067 only, i.e., no HGVs will route through Attlebridge. This commitment is captured within the outline Construction Traffic Management Plan (CTMP) (document refence 9.16).</p> <p>The outline CTMP sets the standards for the contractor to adopt and outlines the types of measures that will be adopted to ensure HGVs use the designated delivery routes These will include advanced direction signing, providing drivers and suppliers with</p>

		<p>delivery instructions and monitoring and enforcement strategies for non-compliance.</p> <p>The outline design for the main compound access has been developed with a reduced junction radius to restrict traffic movements from and towards Attlebridge. Furthermore, following consultation the design has also been further amended to incorporate signage to advise of no right turns from the proposed main compound.</p> <p>The outline CTMP will form the basis of a final CTMP to be developed and approved by the local planning authority in the pre-construction phase.</p> <p>With reference to Cawston, the comment was made in relation to the potential for cumulative impacts. Both Norfolk Boreas and Norfolk Vanguard would result in significant increases in traffic through the village of Cawston. Whilst similar controls on HGV movements (as proposed for Attlebridge) could be adopted, controls on employee vehicle movements are harder to enforce and it was</p>
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			considered that some employee traffic would also travel through Cawston. It was therefore assessed that this additional traffic would further exacerbate the potential cumulative issues at this village.
Jane Kenny on Behalf of Mr J Riley & TM Trustees	The report states there are no collision clusters identified. Further exploration has identified the following information. The below map (Can be found in response) which shows all the collisions within the area was produced by WSP on behalf of the NCC. The subject property is circled black.	N	A review of collision clusters was undertaken for the BRAG assessment using the latest publicly available collision data from [REDACTED]. The BRAG defined a collision cluster as more than three collisions. It can be observed from this data source that there has been only one 'slight' injury collision at the junction of Old Fakenham Road and the A1067 in the last five years.
Jane Kenny on Behalf of Mr J Riley & TM Trustees	East Cawston Site: The report states the site is located in excess of 20km from the middle point along the corridor. It also states RAF Oulton site is within 10km of the middle point of the cable corridor. East of Cawston site is approximately 3 km from RAF Oulton site. Please can you confirm these distances are correct as we believe the East Cawston site is closer to the midpoint than RAF Oulton.	N	This is an error in Appendix 2. Both sites are within 10km of the mid-point (with East of Cawston slightly closer) and are correctly identified as green in the scoring table (Table 6.1). The error in the appendix has been corrected in the version submitted with the DCO application. As this was not an error in the scoring table it does not change the overall findings presented in the site selection report.
Jane Kenny on Behalf of Mr J	The distance [of the East of Cawston site] from the nearest residential property would be subject to where the compound	N	The distance assumed that the compound could be positioned

<p>Riley & TM Trustees</p>	<p>was sited within the field. It is not clear how the distance has been calculated. The western field identified is approximately 11 hectares and the field to the east of the A1149 is approximately 5 hectares. The area required for the compound is 6 hectares. It is considered there would be suitable space to create the main compound at this location whilst maintaining suitable distances from residential properties. This is on the basis of using both fields.</p>		<p>anywhere within the identified fields and acknowledging that there are several properties adjacent to these fields. Spreading the compound across both plots and maximising the distance would position the compound approximately 75m from the nearest properties, which would still score as red.</p>
<p>Jane Kenny on Behalf of Mr J Riley & TM Trustees</p>	<p>East Cawston site: The number and density of the residential properties in the vicinity also needs to be considered in conjunction with distance from the compound. It can't be right that this not a consideration when assessing the suitability of a site.</p>	<p>N</p>	<p>The distance to the nearest properties sought to compare the available options in relation to relatively lower or higher risk of construction noise impacts. Properties beyond 200m are at a lower risk of experiencing construction noise impacts compared to properties within 100m. The impact assessment focusses on whether there is a potential impact or not.</p>
<p>Jane Kenny on Behalf of Mr J Riley & TM Trustees</p>	<p>East Cawston site: It is noted that the access strategy would involve the routing of traffic on the B1145 to the A140 and there are potential pinch points. An alternative route would be to travel south on the Holt Road and take the Buxton Road, east, which is a virtually straight road to the A140 which also means that the vehicles would avoid the suburbs of the market town of Aylsham and the village of Marsham.</p>	<p>N</p>	<p>To the eastern end of Buxton Road (close to the A140), the road is not wide enough for two vehicles to pass and passing places are provided. To the western end of Buxton Road (close to the B1149) the road is does not have a centre line and therefore would (in accordance with UK road markings regulations) be less than 5.5m in width. Typically, roads less than 5.5m in width cannot accommodate two-way HGV traffic movements, without overrunning</p>

			<p>of the adjacent verges, and this can be evidenced along Buxton Road. The use of this alternative suggested route would therefore not influence the conclusions of the BRAG.</p>
	<p>East Cawston Site: It is noted that it is 'inevitable' traffic would go through Cawston' resulting in a high concentration of sensitive receptors. If Equinor are able to direct traffic to avoid going through the village of Attlebridge can the same principle be applied here?</p>	<p>N</p>	<p>With reference to Cawston, this comment is made in relation to the potential for cumulative impacts. Both Norfolk Boreas and Norfolk Vanguard would result in significant increases in traffic through the village of Cawston. Whilst similar controls on HGV movements (as proposed for Attlebridge) could be adopted, controls on employee vehicle movements are harder to enforce and it was considered that some employee traffic would also travel through Cawston. It was therefore assessed that this additional traffic would further exacerbate the potential cumulative issues at this village.</p>
<p>Jane Kenny on Behalf of Mr J Riley & TM Trustees</p>	<p>The land to the west and east of the B1149 is owned by the same landowner who is willing to host the main compound.</p>	<p>N</p>	<p>Equinor appreciates that the landowner at this site is willing to host the main construction compound however following technical and environmental assessments it was found that this site was not suitable.</p> <p>A BRAG (Black-Red-Amber-Green) assessment was used when assessing</p>

			<p>the eight compound site options and the East Cawston location ranked sixth.</p> <p>Whilst it is well positioned from an engineering point of view, the sites scored poorly when considering traffic and transport together with the risk of cumulative impacts on local communities.</p> <p>In respective of cumulative impacts, Hornsea Three, Vanguard and Boreas are all present in this area where there are construction traffic caps placed on each of the projects for main of the roads serving these communities.</p> <p>From a traffic and transport perspective, East Cawston scored lower than other sites in relation to sensitive receptors. Whilst these sites are located on the B1149 which has few sensitive receptors, they are located on the junction with the B1145 at Cawston which is a route with sensitive receptors thus impacting the assessment.</p>
<p>Jane Kenny on Behalf of Mr J</p>	<p>It is also noted RAF Oulton site was acceptable but was dismissed because the site was not available due to Orsted's</p>	<p>N</p>	<p>The criteria used to compare the sties is set out in the Main Compound Site</p>

<p>Riley & TM Trustees</p>	<p>occupation. RAF Oulton offers a hard standing however neither the Fakenham Road site nor East Cawston offer hard standing. The Oulton site has all the same considerations at the East Cawston site as it is necessary to pass East Cawston site to reach the RAF Oulton site. Therefore, it cannot be understood how RAF Oulton site is more preferable than East Cawston?</p>		<p>Selection Report. This has sought to transparently show what those differences. The main areas where RAF Oulton scored higher than the East of Cawston Site were existing hard standing, existing services and distance to nearest properties. These were all red for the East of Cawston site and green for RAF Oulton.</p>
<p>Jane Kenny on Behalf of Mr J Riley & TM Trustees</p>	<p>The BRAG assessment refers to the East Cawston site being in proximity to the village of Cawston and RAF Oulton. East Cawston site is situated approximately 2km from the village of Cawston and 3km respectively from the RAF Oulton site. Stating 'proximity' is ambiguous and confusing in its use in respect of this site.</p>		<p>The BRAG assessment states the following in relation to the East of Cawston site "<i>Whilst DEP and SEP commit to not routing traffic through Cawston, the proximity of this site to Cawston would inevitably risk traffic periodically routing through Cawston</i>". Proximity is simply used to describe something's nearness.</p>
<p>Jane Kenny on Behalf of Mr J Riley & TM Trustees</p>	<p>It would appear there are several uncertainties/inaccuracies within the BRAG assessment spreadsheet which require further examination and assessment. This could result in the BRAG summary findings assessment score being altered and resulting in a change in the ranking for the East Cawston site. The amendments could result in the site moving up the rankings and consequently been taken forward for consideration and evaluation.</p>	<p>N</p>	<p>As set out within our responses throughout this table we believe we have responded to and explained your queries and why we remain confident in the findings set out in the BRAG assessment.</p>
<p>Jane Kenny on Behalf of Mr J Riley & TM Trustees</p>	<p>There has been no consideration to the use and location of the J Riley commercial business units which include 6 business as well as J Riley Harvesters (UK) Ltd. The vehicle movements into the site need to be considered. J Riley Harvesters have</p>	<p>N</p>	<p>To inform the DCO application, the Applicant has captured baseline traffic flow information along Old Fakenham Road. This includes details of total and HGV traffic volumes along the road.</p>

	approx. 25 HGV/ low loaders on a daily basis, together with vans and staff vehicles as do the different business units.		This information has been used by the Applicant to inform the assessment of construction traffic impacts presented within the DCO application.
Jane Kenny on Behalf of Mr J Riley & TM Trustees	There is the Attlebridge Montessori Nursery School which has vehicles visiting the site all day dropping and picking children up from school.		The proposed main compound would be located to the east of the Nursery School. As such, no HGV traffic would be required to pass through this site.
Jane Kenny on Behalf of Mr J Riley & TM Trustees	The main construction compound will be housing a lot of material and machinery which will attract and become a target area for theft. What provision will there be to protect the security of surrounding properties?	N	<p>Securing the perimeter of the site compound is a crucial part of construction site security. However, fences can be cut or jumped and gates can be tampered with. For this reason, it's important to have a second layer of security in place.</p> <p>Security outside of working hours will either be physical security which entails a security guard in attendance patrolling at regular intervals and/or an embedding robust security which supports the infrastructure of the site. This means installing measures such as CCTV, alarm systems and signage including highly visible systems which offer remote monitoring and recording both as deterrent and quick alert for the security to attend.</p> <p>Improved lighting such as focused lighting on entrances, equipment, machinery or other valuable items.</p>

		<p>A crucial part of protecting the site is to have a plan. It is important to officially lay out what our contractor will do to prevent theft, vandalism, injuries, and other incidents.</p> <p>For instance, the contractor shall ensure that tools are always placed inside a locked containers when they are not being used. This will be clearly stated in the plan and this plan shall be in writing and posted in a visible location.</p> <p>It is also critical that everyone on the site understands the plan and buys into the process. Making sure that the teams understand the importance of security and following the correct protocols. They will also need to know how important it is to report any security threats or incidents.</p> <p>Fuel storage will be locked at all times.</p> <p>Excavators, Dumpers, Telehandler etc will be locked including an isolation key and fitted with trackers.</p> <p>Every item of equipment will have a serial number, license plate, or other</p>
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			<p>identifying feature that will be registered.</p> <p>Site welfare will be fitted with vandal guards to all windows and locked outside of working hours. During working hours, the gatehouse at the entrance to the site will be manned with a sign in and out procedure.</p>
<p>Jane Kenny on Behalf of Mr J Riley & TM Trustees</p>	<p>The report states that A1067 Norwich Road site was not sufficiently large enough to support the needs of the main compound being only 2.63 hectares when 6 hectares was required. In addition, there were already well-known environmental issues. Why was the A1067 Norwich Road site included within the Site Selection Report when it didn't fulfil key criteria let alone being selected as one of the two remaining options following further evaluation. However, this site was never going to be stand alone and would require the A1067 Fakenham Road to supplement the lack of space therefore the assessment of the A1067 Norwich Road has prejudiced the current favoured site.</p>	<p>N</p>	<p>The A1067 Norwich Road site was included as whilst it was too small to deliver all requirements it could reduce the footprint of an alternative greenfield site.</p> <p>The top four sites were taken forward for further consideration. Two of those sites RAF Oulton and Woodforde Farm had issues that could not be resolved and were discounted. Leaving the A1067 Norwich Road and A1067 Fakenham Road. Various options were considered to try combine the two options, but ultimately following further surveys at the A1067 Norwich Road site this too was dropped due to historic contamination and highway improvements that the highway authority would not accept. Including</p>

			<p>the A1067 Norwich Road site did not prejudice the exercise. It was a genuine option that was only discounted once detailed surveys and engagement with the local highway authority were completed.</p>
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Stakeholder	Comment	Development Change?	Response
<p>Jane Kenny on behalf of Messrs William and Nicolas Youngs</p>	<p>My clients are the landowners of the possible main compound site at East Cawston. They expressed their willingness to host the main compound to Dalcour Maclaren.</p>	<p>N</p>	<p>Equinor appreciates that your clients are willing to host the main construction compound however following technical and environmental assessments it was found that this site was not suitable.</p> <p>A BRAG (Black-Red-Amber-Green) assessment was used when assessing the eight compound site options and the East Cawston location ranked sixth.</p> <p>Whilst it is well positioned from an engineering point of view, the sites scored poorly when considering traffic and transport together with the risk of cumulative impacts on local communities.</p>

			<p>In respective of cumulative impacts, Hornsea Three, Vanguard and Boreas are all present in this area where there are construction traffic caps placed on each of the projects for main of the roads serving these communities.</p> <p>From a traffic and transport perspective, East Cawston scored lower than other sites in relation to sensitive receptors. Whilst these sites are located on the B1149 which has few sensitive receptors, they are located on the junction with the B1145 at Cawston which is a route with sensitive receptors thus impacting the assessment.</p>
	<p>East Cawston Site: The report states the site is located in excess of 20km from the middle point along the corridor. It also states RAF Oulton site is within 10km of the middle point of the cable corridor. East of Cawston site is approximately 3 km from RAF Oulton site. Please can you confirm these distances are correct as we believe the East Cawston site is closer to the midpoint than RAF Oulton.</p>	<p>N</p>	<p>This is an error in Appendix 2. Both sites are within 10km of the mid-point (with East of Cawston slightly closer) and are correctly identified as green in the scoring table).</p> <p>The error in the appendix has been corrected in the versions submitted with the DCO application. As this was not an error in the scoring table it does not change the overall findings presented in the site selection report.</p>

	<p>The distance [of the East of Cawston site] from the nearest residential property would be subject to where the compound was sited within the field. It is not clear how the distance has been calculated. The western field identified is approximately 11 hectares and the field to the east of the A1149 is approximately 5 hectares. The area required for the compound is 6 hectares. It is considered there would be suitable space to create the main compound at this location whilst maintaining suitable distances from residential properties. This is on the basis of using both fields.</p>	<p>N</p>	<p>The distance assumed that the compound could be positioned anywhere within the identified fields and acknowledging that there are several properties adjacent to these fields. Spreading the compound across both plots and maximising the distance would position the compound approximately 75m from the nearest properties, which would still score as red.</p>
	<p>East Cawston site: The number and density of the residential properties in the vicinity also needs to be considered in conjunction with distance from the compound. It can't be right that this is not a consideration when assessing the suitability of a site.</p>		<p>The distance to the nearest properties sought to compare the available options in relation to relatively lower or higher risk of construction noise impacts. Properties beyond 200m are at a lower risk of experiencing construction noise impacts compared to properties within 100m. The impact assessment focusses on whether there is a potential impact or not.</p>
	<p>East Cawston Site: The access into both of these fields is directly off the roundabout. The report states the access has to be off B1149 and the B1145 and that NCC has previously rejected an application off the B1149 in proximity to the site for a new access onto the road for a compound, whereas these sites benefit from an existing access directly off the roundabout. The previous application was approximately 4km away and didn't have the benefit of the roundabout. Without NCC opinion how can Equinor be confident that this is correct?</p>		<p>The Applicant accepts that there are existing accesses to the East Cawston sites. These accesses are however, substandard and comprise of small 'field' accesses. These field accesses were therefore discounted as being suitable as a means of access and egress from the roundabout for SEP and DEP construction traffic. The BRAG therefore considered that a new</p>

			<p>access would need to be constructed from either the B1149 or B1145 away from the existing roundabout. BRAG assessment for transport however provides a 'Green' score for access to the East of Cawston site, noting that: <i>"Both locations [B1149 or B1145] are considered feasible but would require some localised vegetation clearance to accommodate visibility"</i>. This score was based upon there being no geometric highway constraints to providing access from this location. However, when considering the parameter of land and 'planning risk' in the BRAG, consideration was given to NCCs previous position to reject an application for a large construction compound to take a new access off the B1149 in proximity to this site. When considering the parameters of planning risk, NCC previous refusal on highway grounds is a significant material consideration. Through dialog with NCC on SEP and DEP, NCC have reiterated this position in relation to access from the B1149.</p>
	<p>East Cawston Site: It is noted that the access strategy would involve the routing of traffic on the B1145 to the A140 and there are potential pinch points. An alternative route would be to travel south on the Holt Road and take the Buxton Road,</p>	<p>N</p>	<p>To the eastern end of Buxton Road (close to the A140), the road is not wide enough for two vehicles to pass and passing places are provided. To</p>

	<p>east, which is a virtually straight road to the A140 which also means that the vehicles would avoid the suburbs of the market town of Aylsham and the village of Marsham.</p>	<p>the western end of Buxton Road (close to the B1149) the road is does not have a centre line and therefore would (in accordance with UK road markings regulations) be less than 5.5m in width. Typically, roads less than 5.5m in width cannot accommodate two-way HGV traffic movements without overrunning of the adjacent verges, and this can be evidenced along Buxton Road. The use of this alternative suggested route would therefore not influence the conclusions of the BRAG.</p>
	<p>East Cawston Site: It is noted that it is 'inevitable' traffic would go through Cawston' resulting in a high concentration of sensitive receptors. If Equinor are able to direct traffic to avoid going through the village of Attlebridge can the same principle be applied here?</p>	<p>With reference to Cawston, this comment is made in relation to the potential for cumulative impacts. Both Norfolk Boreas and Norfolk Vanguard would result in significant increases in traffic through the village of Cawston. Whilst similar controls on HGV movements (as proposed for Attlebridge) could be adopted, controls on employee vehicle movements are harder to enforce and it was considered that some employee traffic would also travel through Cawston. It was therefore assessed that this additional traffic would further exacerbate the potential cumulative issues at this village.</p>

	<p>It is also noted RAF Oulton site was acceptable but was dismissed because the site was not available due to Orsted's occupation. RAF Oulton offers a hard standing however neither the Fakenham Road site nor East Cawston offer hard standing. The Oulton site has all the same considerations at the East Cawston site as it is necessary to pass East Cawston site to reach the RAF Oulton site. Therefore, it cannot be understood how RAF Oulton site is more preferable than East Cawston?</p>	<p>N</p>	<p>The criteria used to compare the sites is set out in the Main Compound Site Selection Report. This has sought to transparently show what those differences are. The main areas where RAF Oulton scored higher than the East of Cawston Site were existing hard standing, existing services and distance to nearest properties. These were all red for the East of Cawston site and green for RAF Oulton.</p>
	<p>The BRAG assessment refers to the East Cawston site being in proximity to the village of Cawston and RAF Oulton. East Cawston site is situated approximately 2km from the village of Cawston and 3km respectively from the RAF Oulton site. Stating 'proximity' is ambiguous and confusing in its use in respect of this site.</p>		<p>The BRAG assessment states the following in relation to the East of Cawston site "<i>Whilst DEP and SEP commit to not routing traffic through Cawston, the proximity of this site to Cawston would inevitably risk traffic periodically routing through Cawston</i>". Proximity is simply used to describe something's nearness.</p>
	<p>It would appear there are several uncertainties/inaccuracies within the BRAG assessment spreadsheet which require further examination and assessment. This could result in the BRAG summary findings assessment score being altered and resulting in a change in the ranking for the East Cawston site. The amendments could result in the site moving up the rankings and consequently been taken forward for consideration and evaluation.</p>	<p>N</p>	<p>As set out within our responses throughout this table we believe we have responded to and explained your queries and why we remain confident in the findings set out in the BRAG assessment.</p>
	<p>There has been no consideration to the use and location of the J Riley commercial business units which include 6 business as well as J Riley Harvesters (UK) Ltd. The vehicle movements</p>	<p>N</p>	<p>To inform the DCO application, the Applicant has captured baseline traffic flow information along Old Fakenham</p>

	<p>into the site need to be considered. J Riley Harvesters have approx. 25 HGV/ low loaders on a daily basis, together with vans and staff vehicles as do the different business units.</p>		<p>Road. This includes details of total and HGV traffic volumes along the road. This information has been used by the Applicant to inform the assessment of construction traffic impacts that is presented within the DCO application.</p>
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