



Norfolk County Council

Sheringham Shoal & Dudgeon Extension Projects

Norfolk County Council's response to the Examining Authority's (ExA) First Written Questions (WQ1)

Scheme Identification Number: EN010109

Registration Identification Number: 20033126

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Responses have been provided by:

Jan Feeney Employment and Skills Manager

Jane Locke Prevention Policy Manager, Public Health

John Shaw Developer Services Manager, Highways

Sarah Luff Strategic Flood Risk Planning Officer, Lead
Local Flood Authority (LLFA)

Stephen Faulkner Principal Planner, National Infrastructure
Planning

ExA WQ1	Question to:	Question:
Q1.1.4 Miscellaneous		
Q1.1.4.2	Local Authorities	Availability of Resources for NSIP casework Are you confident that you have, or shortly will have, sufficient resources to deal with the NSIP-related workload that will be associated with the Proposed Development during the examination and recommendations phases and that would be associated with the Proposed Development if the SoS made an order granting development consent?
	NCC Response:	<p>The County Council have entered into detailed discussion / negotiation with the applicant to cover-off cost recovery of officer time both during the Examination; and post Examination in the event of the DCO being granted by the SoS.</p> <p>The County Council would ultimately look to having some form of agreement in place with the applicant covering cost recovery, which could involve: either a bespoke Planning Performance Agreement (PPA); and/or Letter of Intent with the applicant. This would then ensure sufficient resource to deal with the above DCO (e.g., discharges etc).</p>
Q1.3.1 Effects on Marine Life and Benthic Habitats including through Cable Installation Methods		
Q1.3.1.1	Local Authorities Environment Agency Natural England Royal Society for the Protection of Birds Marine Management Organisation	Intertidal and Subtidal areas Are you content with the Applicant's assessment of the adverse effects of the use of long HDD to bring the export cables ashore at landfall [APP-094]? Explain with reasons.
	NCC Response:	This is a matter for the District Council.
Q1.6.4 Effects of construction works on human health		
Q1.6.4.9	Norfolk County Council	Mental Health Mitigation NCC [RR-064] set out that it would like the Applicant to include further mitigation measures to address any adverse effects on mental health, especially given the potential length of construction works. Is this justified given that NCC agrees that there are unlikely to be any significant, long term adverse health impacts from the proposal compared to baseline conditions. If it is, then how could further mitigation be secured?
	NCC Response:	Whilst the health impact assessment shows that there are unlikely to be significant long term health impacts from the proposal, it is likely that the works

		<p>could cause stress, anxiety and depression in the short to medium term as construction works are underway. This can be mitigated, as suggested, by ensuring that affected communities are well informed about when disruption will take place. The developer could ensure that a community liaison officer is employed who could hold regular meetings with local people, provide written and online information about when any disruption is likely to take place and how long it will last for; provide information about alternative routes when public rights of way (PROW) are impacted by the works; and provide a point of contact for the public to ensure that any complaints or anxieties are dealt with swiftly and effectively.</p> <p>Furthermore, even though there is little evidence to suggest that electromagnetic fields (EMFs) are a risk to human health, this type of infrastructure can cause public concern and give rise to potential anxiety in local populations. An information campaign about EMFs in clear and non-technical language could go some way to alleviating these fears.</p>
<p>Q1.6.5 Effects from emissions on air quality</p>		
<p>Q1.6.5.4</p>	<p>Applicant Local Authorities</p>	<p>Road Traffic Emissions Assessment Methodology When considering construction road vehicle exhaust emissions, the assessment [APP-132] sets out that “Peak construction flows were not used in the assessment, as peak construction would occur over a 1 or 2 month period (at worst) and using these to derive AADT across a full year would unrealistically inflate the impacts of construction generated traffic. The use of average construction flows was deemed to be robust and more appropriate representation of construction impacts from traffic over an annual period, and aligns with the requirement for use of AADT flows”. LAs do you agree with this approach? Applicant, provide further justification for this approach.</p>
	<p>NCC Response:</p>	<p>This is a matter for the District Council.</p>
<p>Q1.6.6 Adequacy of the Outline Code of Construction Practice</p>		

<p>Q1.6.6.1</p>	<p>Applicant Local Authorities National farmers Union</p>	<p>a. Outline Code of Construction Practice The OCoCP [APP-302, Table 1-1] sets out a number of EMPs that will form part of the final CoCP and will be prepared, submit and approved post-consent. A pre-construction drainage plan, a scheme to deal with the contamination of any land (including groundwater), a Materials Management Plan, Soil Management Plan, a Site Waste Management Plan, hydro-fraction surveys (for bentonite breakout) and a Construction Surface Water Drainage Plan are all referred to in the main text of the OCoCP but are not included in Table 1-1. Why is this?</p> <p>b. Confirm the status and origin of EMPs listed in Table 1-1.</p> <p>c. The OCoCP refers to Construction Method Statements. What will these include?</p> <p>d. Justify the level of detail and content provided to date within the suite of EMPs.</p> <p>e. Is it possible for the ExA to be sure that such EMPs will be successful in mitigating any impacts without seeing more detail?</p> <p>f. Local Authorities and NFU are there any management plans that you consider are crucial to review during the Examination? Explain with reasons.</p>
	<p>NCC Response:</p>	<p>The Highways team are content with the OCoCP but it would be beneficial for the list of trenchless crossings to make a cross reference to Appendix 4.1 of the ES - Crossing Schedule [APP-178] which sets out the specific list of where all of those crossings will be. As written, the list in the OCoCP simply contains a partial list and not necessarily the location.</p> <p>The LLFA have comments to make regarding the following points:</p> <p>e.) The EMPs will identify the proposed working practices on site to manage environmental risks. It will be for the LPA to ensure these practices are adhered to on site by the applicant.</p> <p>f.) When the applicant prepares their management plans, they should review all relevant best practices to ensure an appropriate EMP is developed for the site works.</p>
<p>Q1.10.1 Design Principles</p>		
<p>Q1.10.1.1</p>	<p>Applicant Local Authorities Statutory Bodies Interested Parties</p>	<p>Suitability and Adequacy of the Applicant's Approach to Design</p> <p>a) Has the Applicant satisfied the requirements set out in NPS EN-1 Section 4.5 in relation to sensitivity to place and contributing to the</p>

		<p>quality of the area in which the infrastructure would be located?</p> <p>b) Clarify, with reasons, whether you believe that design outcomes relating to proposed elements of infrastructure, structure and buildings proposed within the order limits, flood risk, landscape and ecology are sufficiently well developed within the application documents.</p> <p>c) Confirm, with reasons, whether you believe that noise mitigation measures and construction structures related to the construction compound should also be considered as part of the Applicant's approach to design. Applicant may respond</p>
	NCC Response:	<p>The LLFA have the following comments regarding points B:</p> <p>At present, the LLFA are waiting for the updated surface water management design for the Onshore Substation site. Previously the LLFA has only seen two high level options that were being considered. The LLFA needs the updated information before we can respond appropriately.</p>
Q1.10.2 Design Development Process		
Q1.10.2.1	Applicant Local Authorities Statutory Bodies Interested Parties	<p>a) Provide further detail of the structured framework within which the Applicant has carried out its design process to date, giving detail of the key milestones which have been reached within that process and setting out which elements of the overall design have been fixed at this stage.</p> <p>b) Set out the main stages of the remainder of the design process required to fully develop the Applicant's design of the Proposed Development in the event that its application is granted Development Consent, giving an indication of expected deliverables and timescales wherever possible and indicate how this process will be secured within the draft DCO.</p> <p>c) Provide an outline description of the design professional disciplines that have contributed to the Applicant's design process to date.</p> <p>d) Set in further detail how the Applicant's design principles – established in its Design and Access Statement [APP-287] – are secured within the draft DCO</p>
	NCC Response:	This is a matter for the Local Planning Authority.
Q1.10.2.2	Applicant Local Authorities	Design Review Comment, with reasons, if the Applicant should seek independent design review

	Statutory Bodies Interested Parties	advice in line with the policy recommendation in NPS, Paragraph 4.5.5.
	NCC Response:	This is a matter for the District Council.
Q1.11. Draft Development Consent Order		
Q1.11.1.3	Applicant Discharging Authorities	Discharging Requirements and Conditions Applicant, provide a list or table of specifically named authorities and undertakers that are relevant in the dDCO for each and every reference to the following. Please list separately, instances where any of the following, for example 'local authority', refers to different body or bodies. • highway authority • lead local flood authority • relevant planning authority • local planning authority • street authority • drainage authority • sewerage undertaker • local authority • acquiring authority • public authority • Crown authority • approving authority
	NCC Response:	Norfolk County Council is requesting in its Local Impact Report (LIR) that the dDCO be amended in respect of the Requirements Section (covering Requirements 16 and 24) to indicate that the Local Planning Authority (respective District Council / Relevant Planning Authority) are the discharging authority. This approach would be akin to any other application/permission determined under the Town and Country Planning Act (TCPA) i.e., where the LPA are the determining authority and would discharge as appropriate any Planning Condition (in consultation with the appropriate regulatory body e.g., Highway Authority; LLFA; Environment Agency etc).
Q1.11.2 Definitions		
Q1.11.2.2	Applicant Local Authorities Interested Parties	Commence a) How would the activities currently excluded in the definition of commence be controlled, monitored and mitigated, given the CoCP would not be approved and enforceable (in line with R19) when the works excluded from the definition of commence may need to take place? b) Local Authorities, do you have concerns about works being delivered without any controls, in particular activities such as diversion and laying of services, the erection of any temporary means of enclosure, and the erection of welfare facilities? c) Local Authorities, are there other activities excluded from the definition of commence that you consider should be controlled through a management plan? Explain with reasons.

		<p>d) Applicant and Local Authorities, is there a need for a definition for pre-commencement works and an accompanying management plan?</p> <p>e) Are there any concerns from any party about the scope, breadth and definition of commencement with the Order or its accompanying dDMLs? If so, explain what they are and the implications that you use the ExA to take account of.</p>
	<p>NCC Response:</p>	<p>The Highways team are satisfied that the relevant processes are covered and controlled.</p> <p>The LLFA have comments to make regarding the following points:</p> <p>Point B The LLFA normally request information on relevant temporary works that could affect the flood risk or surface water management in a construction surface water management plan. The LLFA has not yet reached this stage as to date the applicant has not been able to confirm the proposed surface water drainage and discharge arrangement for the onshore Substation. While for the cable route corridor, the temporary works would be associated with the construction compounds and the watercourse crossings. The work course crossings would be regulated by the relevant risk management author (Environment Agency / IDB / LLFA), while the temporary surface water drainage arrangements should be provided for each of the proposed construction compounds.</p> <p>Point C The LLFA is not aware of any at this time but as yet we do not have all the information for the proposed surface water management scheme for the Onshore Substation.</p> <p>Point D There is a need for the ordinary watercourse consents to be in place prior to commencement along with the preparation of a detailed surface water drainage design for the Onshore Substation, which is yet to be provided.</p>
<p>Q1.11.4 Schedules</p>		
<p>Q1.11.4.2</p>	<p>Discharging Authorities</p>	<p>Further Associated Development Are you satisfied that all instances of further associated development in connection with Work Nos. 1B to 7B, Work Nos. 8B to 22B, Work Nos. 3C, 4C, 5C and 7C and Work</p>

		Nos. 8C, 9C, 12C, 15C, 16C and 17C are controlled adequately by the provisions in the dDCO?
	NCC Response:	The Highways team are not the discharging authority but are satisfied with the above. The LLFA are only the discharging authority in relation to ordinary watercourse consents for ordinary watercourses that are in their jurisdiction.
Q1.11.4.3	Discharging Authorities	Ancillary Works Are you satisfied that all instances of ancillary works are controlled adequately by the provisions in the dDCO?
	NCC Response:	The Highways team are not the discharging authority but are satisfied with the above. The LLFA are only the discharging authority in relation to ordinary watercourse consents for ordinary watercourses that are in their jurisdiction.
Q1.11.4.5	Discharging Authorities	Accuracy of all Schedules Check the Schedules in the dDCO for accuracy and provide the ExA with suggested corrections and amendments.
	NCC Response:	The Highways team are not the discharging authority therefore, with respect to Highways, the above is a District Council matter. The LLFA are only the discharging authority in relation to ordinary watercourse consents for ordinary watercourses that are in their jurisdiction. While there is a crossing schedule, it is not clear at this time whether all the watercourse crossings have been identified by desk top survey or site walk over and where there are any provisions for additional ordinary watercourse crossings should they be identified at a later date.
Q1.11.7 Interaction of the dDCO with Other Legislated DCOs, Other Existing Infrastructure and Planned Projects		
Q1.11.7.1	Applicant Vattenfall RWE Renewables Orsted Hornsea Project 3 National Highways Norfolk County Council	Hillside Parks Ltd v Snowdonia National Park Authority (the Hillside Judgement) The ExA acknowledge the above judgement relates to a non-Development Consent Order case. However, it occurs to the ExA that the principles of the judgement may be applicable for the Proposed Development given the level of interaction of the scheme with other existing consented DCOs, including land subject of compulsory acquisition. The ability to modify the initial permission in the DCO context is based on the specific power in section 120 of the Planning Act 2008. In this respect: <ul style="list-style-type: none"> a) would any existing consented DCO need to be modified or amended by the Proposed Development? b) would any existing consented DCO be prejudiced in the ability to be implemented, either through works or land take, to the

		<p>extent it could not come forward in accordance with its terms and management plans?</p> <p>c) provide any other views on the relevance, or otherwise, of the judgement upon this project.</p>
	NCC Response:	The Norwich Western Link team will respond directly as a separate interested party.
Q1.13.1 Effects on European Designated Sites and Sites of Special Scientific Interest		
Q1.13.1.1	Local Authorities Environment Agency Natural England	Air Quality and Screening of Ecological Sites Can you confirm if the approach to the selection of all the relevant European sites, the scopes of the in-combination assessment, the assessments and the conclusions reached by the Applicant is acceptable [APP-108, paragraph 138 (though not limited to that paragraph only)].
	NCC Response:	This is a matter for the District Council.
Q1.17.1 Effect on Landscape Character and Views		
Q1.17.1.1	Local Authorities	<p>LVIA Methodology</p> <p>The ES states that the LVIA was undertaken both in accordance with GLVIA3 and with direct input from local authorities as to the location and frequency of viewpoint analysis [APP-112].</p> <p>a) In this context, can you confirm that the selection of receptors (and their sensitivity) is reasonable and that there are no outstanding concerns regarding the process that the Applicant undertook (notwithstanding you may disagree with its results and conclusions).</p> <p>b) Are you satisfied with the study areas adopted by the Applicant for the onshore substation and the landfall site?</p> <p>c) If not, please set out the reasons for this position and indicate what additional areas should be included and the reasons why these areas should be included.</p>
	NCC Response:	This is a matter for the District Council.
Q1.17.1.9	Local Authorities The Applicant	<p>Residential Receptors The Applicant notes that a RVAA has not been undertaken because the nearest receptors would fall below the relevant threshold [APP-112, paragraphs 117-120].</p> <p>a) LAs, is this a reasonable approach?</p> <p>b) LAs, what weight should be given to private views from residential properties in the Examination, in the ExA's considerations and in the SoS's decision? Applicant may respond</p>
	NCC Response:	This is a matter for the District Council.

Q1.17.2 Effects on designated and historic landscapes, including Areas of Outstanding Natural Beauty and Ancient Woodlands		
Q1.17.2.2	The Countryside Charity (CPRE) Norfolk Norfolk County Council North Norfolk District Council Norfolk Wildlife Trust	AONB Do you consider that the Proposed Development prejudices the special qualities of the affected AONB and, if so, state which ones and why conflict is considered to arise?
	NCC Response:	This is a matter for the District Council.
Q1.17.3 Effectiveness of mitigation proposals		
Q1.17.3.4	Local Authorities	Extent of Mitigation Would the mitigation planting illustrated by the Applicant be effective in reducing the magnitude and significance of the visual effect of the Proposed Development? If not, why not? What other steps should be considered in order to provide the necessary change in magnitude and significance of the visual effect of the onshore substation buildings and/ or structures?
	NCC Response:	This is a matter for the District Council.
Q1.17.3.6	Local Authorities Interested Parties	Outline Landscape Management Plan Are you satisfied that the details of location, number, species, size and density of proposed planting around the onshore substation need not be considered during the Examination [APP-303]?
	NCC Response:	This is a matter for the District Council.
Q1.18.1 Effect on Seascape Character and Views		
Q1.18.1.1	Local Authorities	SLVIA Methodology The ES states that the SLVIA was undertaken both in accordance with direct input from local authorities as to the location and frequency of viewpoint analysis [APP-111]. In this context, can you confirm that the receptors (and their sensitivity) are reasonable and that there are no outstanding concerns regarding the process that the Applicant undertook (notwithstanding you may disagree with its results and conclusions).
	NCC Response:	This is a matter for the District Council.
Q1.18.3 Effects on Designated and Historic Landscapes		
Q1.18.3.1	The Applicant Local Authorities, Interested Parties	The Existing Baseline and its Effect on the Statutory Purpose of the NCAONB NE states that the existing OWF installations have a compromising effect on the statutory purpose of the NCAONB [RR-063]. Respond, with reasoning.
	NCC Response:	This is a matter for the District Council
Q1.18.3.2	Local Authorities,	The Extent of Additional Harm to the NCAONB What is your assessment of the effects of the Proposed Development on the NCAONB in EIA terms?
	NCC Response:	This is a matter for the District Council

Q1.18.3.3	The Applicant Local Authorities, Interested Parties	Cumulative Impact Assessment Should a CIA be undertaken in order to inform the EIA to ensure that the impact of SEP and DEP on the statutory purpose of the NCAONB, in the context of the existing OWF, can be made?
	NCC Response:	This is a matter for the District Council
Q1.18.3.5	Local Authorities	Tourism and Coastal Footpaths Is there any evidence to suggest that the construction of offshore wind turbines, and their cumulative seascape impact, has impaired, prejudiced or resulted in the loss of tourism activities/ enjoyment along the North Norfolk coast?
	NCC Response:	This is a matter for the District Council
Q1.18.3.6	Historic England Norfolk County Council North Norfolk District Council	North Norfolk Heritage Coast Explain your respective positions on the qualities and significance of the Heritage Coast, particularly the stretch within which the Proposed Development would be theoretically and actually visible. Set out where you consider harms would occur and what, if anything, could be done to minimise the harm or improve the visitor experience.
	NCC Response:	This is a matter for the District Council.
Q1.18.3.7	Historic England Norfolk County Council North Norfolk District Council	Aviation Lighting Would you wish to see revisions to the quantum aviation lighting across both the Proposed Development together with the existing extent of the SOW and DOW, to minimise it where possible, so as to minimise night-time effects on the historic seascape?
	NCC Response:	Matters relating to the historic seascape are the responsibility of Historic England to provide comments. Norfolk County Council's responsibility does not extend further than mean low tide.
Q1.18.4 Cumulative Effects		
Q1.18.4.1	Local Authorities Interested Parties	Cumulative Effects Are you satisfied with the list of projects included in the assessment of potential cumulative landscape and visual effects? If not, identify those projects that you believe should be included and indicate why you believe that they should be included.
	NCC Response:	This is a matter for the District Council
Q1.20.1 Adequacy of the Assessments for Construction		
Q1.20.1.1	Applicant Local Authorities	Methodology – Baseline Noise Survey The ES [APP-109, Paragraph 51] states that the baseline survey methodology was agreed with BDC. Large parts of the cable corridor, landfall and the substation are located in other local authority areas (NNDC and SNDC). Do NCC, NNDC and SNDC agree with the scope and extent of the

		baseline survey?
	NCC Response:	This is a matter for the District Councils.
Q1.20.1.2	Applicant Local Authorities	Methodology - Baseline Noise Assumptions a) What is the justification for not undertaking baseline noise surveys at sensitive receptors along the onshore cable route and assuming a Category A threshold value [APP-109]? b) Further, explain why no surveys were undertaken in proximity to the main construction compound at Attlebridge. c) Is it possible that actual baseline levels at the sensitive receptors could be lower than assumed? d) If so, what impact would this have on the assessment?
	NCC Response:	This is a matter for the District Councils.
Q1.20.1.4	Local Authorities	Methodologies – Noise and Vibration Do NCC, NNDC, SNDC and BDC agree with the Construction Phase Noise, Road Traffic Noise Assessment and Construction Phase Vibration Assessment Methodologies adopted in the ES [APP-109], including the predicted construction noise and vibration levels?
	NCC Response:	This is a matter for the District Councils.
Q1.20.4 Adequacy and Design of Proposed Mitigation		
Q1.20.4.3	Applicant Local Authorities	Potential Impacts – Monitoring Operational Noise To be effective should dDCO R21 be explicit about where monitoring should be done, such as the onshore substation? Provide revised wording if so.
	NCC Response:	This is a matter for the District Councils.
Q1.22.1 Effects on recreation, tourism and business		
Q1.22.1.4	Norfolk County Council Norfolk District Council	Tourist Income In respect of the tourism assets on offer: a) Explain the main forms of tourism within Norfolk and, if possible, specifically in the areas where the Proposed Development would be located. b) Explain the revenue that is derived from tourists visiting Weybourne Beach. c) Explain how construction works, particularly road closures and traffic management measures, deter or otherwise impinge on a tourist's desire to visit and explore Norfolk.
	NCC Response:	The above is a North Norfolk District Council matter.
Q1.22.2 Effects on jobs and skills		

Q1.22.2.8	Applicant Local Authorities	<p>Outline Skills and Employment Plan</p> <p>The OSEP [APP-310] sets out that the Applicant intends to work with the relevant sector and local authority bodies to help secure economic benefits of the OWF to the local area and identifies a number of general outline commitment examples. Is the OSEP currently sufficient to ensure local socio-economic benefits are secured and maximised, and are firmer commitments and targets for local employment and skills/training needed, particularly to realise the potential benefits set out in the ES [APP-113]?</p>
	NCC Response:	<p>It is considered that OSEP is broadly sufficient at this stage, given that Requirement 26 ensures that the Plan will need to be approved by the relevant planning authority.</p> <p>The County Council, has through its comments set out in the LIR, requested that the Skills and Employment Plan should be submitted to and approved by the relevant Planning Authority following consultation with Norfolk County Council; and the New Anglia Local Enterprise Partnership (LEP); and (2) Each skills and employment plan must be prepared in consultation with the relevant planning authority; Norfolk County Council; and the New Anglia LEP.</p> <p>Following early engagement with NCC's Employment & Skills Manager, the outline Skills & Employment Plan (9.23/APP-310) was shared in July 2022. On 8.11.2022 detailed feedback from NCC was received.</p> <p>The following actions have been agreed whereby the applicant will:</p> <ol style="list-style-type: none"> 1. Integrate NCC suggestions and insights appropriately into the OSEP for deadline 3, May 2nd 2. Initiate a consultation with Norfolk and Suffolk LSIP/ Norfolk Chamber with regard to the Local Skills Improvement Plan, in order that there is time for this relationship to inform the Final Skills and Employment Plan and the skills section of the Allocation Round Supply Chain Plan Questionnaire 3. Engage with Apprenticeships Norfolk (part of NCC Skills and Employment Team) to understand and maximise opportunities for the effective transfer of unspent Apprenticeship Levy Funding 4. Develop draft KPI's that will bridge the 'possible' commitments in section 9 with

		<p>what will form part of the Supply Chain Plan commitments to be formally delivered and monitored through each project phase When the Supply Chain Plan is submitted and approved the ongoing monitoring will then become part of this formal process.</p> <ol style="list-style-type: none"> 5. Capture early phase (development) activity – record, monitor and evaluate capturing good practice and lessons learned 6. Engage with other developers working in Norfolk through NCC facilitated dialogue to maximise opportunities, avoid duplication and to jointly develop and deliver initiatives as appropriate 7. Start a proactive discussion with the emerging Great Yarmouth O & M Campus (GYBC) to seek further synergies linked to skills, training and employment 8. Continue to engage regularly with NCC skills and employment team in seeking to maximise socio- economic opportunities locally
<p>Q1.22.3 Effects on Individuals and Communities</p>		
<p>Q1.22.3.2</p>	<p>Local Authorities</p>	<p>Development Consent Obligations NNDC [RR-069] reference potential community benefits being secured through an obligation. Describe to the Examination the nature and extent of any benefits you consider are necessary relative to the impacts of the Proposed Development, setting out how these comply with the CIL Regulations and the justification for them.</p>
	<p>NCC Response:</p>	<p>The County Council would wish to see a community benefit fund (CBF) set up to assist those local communities most affected by the above development.</p> <p>It is recognised, as with other granted DCOs, that such CBFs sit outside the formal DCO process; and are typically taken forward post consent by the promoter.</p> <p>It would be helpful at this stage if Equinor could in principle indicate that it would be willing to take forward a CBF akin to those currently being developed by Vattenfall and Orsted in relation their DCOs.</p> <p>It is understood and accepted that any such CBF would be a voluntary undertaking by the promoter and sit outside the DCO; and TCPA consenting regime.</p>
<p>Q1.23.1 Effects from Construction Vehicles on the Highway Network and Living Conditions</p>		

<p>Q1.23.1.1</p>	<p>Applicant Norfolk County Council</p>	<p>Methodology – Summer Peak The ES [APP-110, Table 24-10] includes links that have ‘summer peak’ sensitive periods. The ExA asked the Applicant at ISH2 [EV-020] [EV-024] what had been done to assess summer peaks. The Applicant and NCC set out that they were in discussions about ‘sensitivity checking’ on such matters. Provide an update on these discussions.</p>
	<p>NCC Response:</p>	<p>The applicants intend to use several routes that Norfolk Vanguard / Norfolk Boreas / and Hornsea 3 also intend to use during the summer season.</p> <p>A considerable amount of work was undertaken as part of the above mentioned DCO’s into summer peak sensitivity and traffic caps were imposed under the above DCO’s. This was the applicants starting point.</p> <p>When Covid struck the Highways team were concerned the applicant’s data may be affected by artificially reduced traffic levels on the network. Accordingly, within our Section 42 comments we said that a re-survey might be required along certain links after September 2021, by which time we anticipated traffic levels would have settled down again.</p> <p>Having monitored the situation, the Highways team subsequently agreed mid 2022 that the baseline traffic data presented in the PEIR (based on pre-covid figures) could be utilised, with the developers using TEMPro (its modelling software to predict future traffic levels) to factor baseline growth to a future year which we have agreed as being 2025.</p> <p>In addition to the above the Highways team asked that the OCTMP contains a clause allowing us to ask for further assessment of network capacity constraints at identified sensitive junctions if baseline traffic conditions are evidenced to have changed materially from those of the DCO application post consent. In other words – if traffic levels pick up, we can get the applicants to re-survey along the sensitive links.</p> <p>The Highways team also asked for the OCTMP to include measures to manage traffic movements during peak periods to account for seasonal fluctuations.</p> <p>At the risk of over simplifying matters, the applicants will not exceed the traffic caps agreed under the above already approved DCO’s and we are content</p>

		<p>with that approach. However, the overall result will mean the impacts will last for longer (in terms of years).</p> <p>We did identify two additional links - Link 45 & 46, which if they included HGVs, would also require summer restrictions.</p> <p>The applicants have indicated there will be no HGVs on either Link 45 or 46. This commitment is contained within the OCTMP. Annex A of which contains a table of the proposed numbers of daily HGV trips per link and no HGVs are proposed via either link 45 or 46.</p> <p>For completeness, the Highways team also examined the need for summer restrictions at the Bodham site Compound. The applicant's response is contained within the attached document dated 10 January 2023, which is acceptable to us.</p> <p>Subject to the applicants not exceeding the caps already agreed, NCC is content.</p>
Q1.23.1.3	National Highways Norfolk County Council	<p>Methodology – Trip Generation and Construction Traffic Assignment</p> <p>Are the Highway Authorities content with the methodology and forecasts for trip generation and construction traffic assignment?</p>
	NCC Response:	The Highways team are content with the above.
Q1.23.1.4	Applicant Norfolk County Council	<p>Potential Impacts – Driver Delay (Capacity)</p> <p>The ES [APP-110, Table 24-43] shows that there are increases in traffic above 10% (considered to be within daily fluctuations) for numerous links (9, 11, 14, 15, 49, 51, 54, 56, 59, 72, 73, 79 and 98). Some of the traffic increases are up to 32% on what are already deemed to be sensitive roads by NCC.</p> <p>a) Is the judgement of a low magnitude of effect on these links justified? b) Do NCC have any concerns in this regard?</p>
	NCC Response:	<p>NCC raised similar concerns to the above. However, based on our local knowledge the Highways team also picked up on several additional links not included within your list.</p> <p>Rather than respond in detail for each of the individual links, the Highways team have included, alongside this document, a copy of the applicant's response to our concerns (dated 10 January 2023). On 18th January 2023, NCC held an additional</p>

		meeting with the applicants to go through their response and we are now content.
Q1.23.2 Traffic Management Proposals and Impacts on the Highway Network		
Q1.23.2.3	Norfolk County Council	<p>The A140</p> <p>In proximity to the entrance into Mangreen Road and the location of the substation, the ExA noted signage regarding a “Bridge Safety Scheme”, and this appeared to be speed related. Could the exact nature of the safety scheme be described and, subsequently, whether the Proposed Development would have any implications or adverse effects in this regard?</p>
	NCC Response:	<p>The safety scheme relates to a railway line incursion risk at the overbridge north of Dunston Hall.</p> <p>The 40mph speed reduction scheme was introduced to mitigate the risk of having a substandard containment parapet at what was deemed to be a high-risk site. The scheme involved the introduction of a safety barrier to the verge adjacent to the southbound carriageway, which happens to be on the outside of the bend. In order to accommodate the barrier and achieve the required 0.6m setback, the traffic lanes over the bridge had to be narrowed to 3.0m which in turn resulted in the introduction of the 40mph speed restriction.</p> <p>As part of our discussions with the applicants we asked them to provide a speed assessment and topographical survey for the Mangreen Road junction.</p> <p>Subject to the applicants carrying out the improvements (road widening etc) agreed as part of the OCTMP, we have no issues for the traffic levels/type they have indicated.</p> <p>The Highways team would also add, the junction improvements proposed by the applicants will make the junction safer for existing traffic and not just the new traffic associated with this development.</p>
Q1.23.6 Effectiveness of Proposed Mitigation Measures		
Q1.23.6.1	Applicant National Highways Norfolk County Council	<p>Mitigation – A47</p> <p>The TA [APP-268] identifies significant impacts on two junctions of the A47 that fall within the study area. Both of these junctions are proposed to be removed by highway improvement schemes.</p> <p>a) What is the latest position on these</p>

		<p>improvement projects (A47 North Tuddenham to Easton Development Consent Order and A47-A11 Thickthorn Junction Development Consent Order) and are they still forecast to be completed before the construction of the Proposed Development starts?</p> <p>b) Should they not be delivered are the mitigation measures set out in the OCTMP sufficient as a 'fallback' to ensure there are not any significant impacts on the road network?</p> <p>c) If the improvement works under either of the DCOs were to be delayed and occur concurrently with the onshore construction programme of this project, would the OCTMP for the Proposed Development, taken together with other OCTMP, provide adequate 'fallback' mitigation for the cumulative effects of both projects on the road network?</p> <p>d) Further to b) and c) above, what confidence can the ExA have that adequate mitigation measures are available and achievable in these scenarios?</p>
	<p>NCC Response:</p>	<p>The impacts are primarily for National Highways to advise upon. The concern NCC highlighted is that if the Trunk Road (National Highways) schemes are delayed and the works are concurrent with the Equinor project, certain junctions and links the applicants intend for use may not be available to them.</p> <p>If that proves to be the case, the applicants will need to seek alternative routes. Given any such changes would fall outside the DCO consent, NCC can control any such amendments. The risk therefore falls upon the applicants, (especially if there isn't a suitable alternative link available), to ensure they have an agreed approach with National Highways.</p>
<p>Q1.24.3 Effects on Rivers, Streams, Canals and Ditches from Proposed Construction Methods and Crossing</p>		
<p>Q1.24.3.1</p>	<p>Environment Agency Norfolk County Council</p>	<p>Watercourse Crossings</p> <p>Comment on whether the proposed watercourse avoidance measures, as set out in the FRA [AS-014, Paragraph 158], provide sufficient security for those watercourses and the hydrological systems that feed into them.</p>
	<p>NCC Response:</p>	<p>There are a small number of ordinary watercourses that are under the jurisdiction of the LLFA. At present there is no suitable representation of approach to be applied to these watercourses. In addition, the LLFA requests confirmation on</p>

		whether the watercourses identified in the Crossing Schedule (AS-022) were identified using a desktop exercise or by walking the proposed cable route?
Q1.24.3.4	Environment Agency Norfolk County Council	<p>Ordinary Watercourses</p> <p>With reference to the ES [APP-104, Paragraphs 104-106], given the extremes of climate that are being experienced, when would the temporary damming of watercourses be scheduled in the construction programme to have the least impact?</p>
	NCC Response:	<p>This is difficult question to answer due to the impacts of climate change on our daily weather patterns. However, typically the short term the winters are still likely to be wetter than the summers, although the summers are more likely to experience intense rainfall events. The applicant must always consider the weather and the appropriate methods for ensuring the continuity of flow along the ordinary watercourses. A schedule would be required by the LLFA for the temporary works. In addition, the applicant would be requested to provide an out of hours management approach and ensure there was adequate facility to over pump high flows around the temporary works.</p> <p>The LLFA has only just received contact from the applicant regarding the small number of ordinary watercourse consents identified. This discussion is in the very early stage and the outline information provided to the LLFA is only what has been provided to PINS to date.</p>
Q1.24.4 Effectiveness of Mitigation Measures		
Q1.24.4.8	Applicant Environment Agency Norfolk County Council	<p>Site-Specific Investigations at Crossings</p> <p>The FRA [AS-014, Paragraph 410] identifies that site-specific investigations will be carried out and crossing methodologies produced at detailed design stage to identify the local ground and groundwater conditions, enable a site-specific hydrogeological risk assessment to be undertaken and to understand the potential impact of any works on flows along the watercourse and flood risk in the local area. Is it appropriate to undertake these post- consent and where are these measures secured in the OCoCP [APP-302]?</p>
	NCC Response:	<p>Some initial site-investigations would be appropriate to mitigate some of the associated risks.</p> <p>The LLFA notes that in Paragraph 37 of APP-302 the document indicates that “18 of 32 watercourses being crossed are maintained by Norfolk County Council”. This statement could only be considered</p>

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		<p>as correct if Norfolk County Council were the riparian owners in this location, otherwise the county council is just the “regulatory authority” at the crossing outside of the main river and IDB areas.</p> <p>It is for the applicant to demonstrate where these measures in the OCoCP [APP-302].</p>
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