



# Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects

Written Summary of the Applicant's Oral Submissions  
at Issue Specific Hearing 2

Revision A

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## 1 Introduction

1. This note summarises the submissions made by Equinor New Energy Limited (the Applicant) at Issue Specific Hearing 2 - Onshore Strategic Matters (ISH2) on 20 January 2023. This document does not purport to summarise the oral submissions of parties other than the Applicant; summaries of submissions made by other parties are only included where necessary in order to give context to the Applicant's submissions.
2. In the Examining Authority's (ExA) **Rule 8 letter** [PD-009], it confirmed that the ISH2 hearing actions have been incorporated into the **ExA's Written Questions (WQ1)** [PD-010] and therefore the Applicant has not produced a separate post hearing actions response document for Deadline 1.
3. However, the Applicant wishes to note an action from the Preliminary Meeting which the Applicant considers is best addressed in this summary. The Applicant can confirm that Norwich City Council were originally a 'B' host authority and so were consulted in 2020. However, with the refinement of the order limits Norwich City Council are now categorised as an 'A' neighbouring, lower tier council. They are neighbours to Broadlands & South Norfolk Council. They did not provide a Section 42 responses and did not provide a Section 56 representation. The Applicant's position remains that a Statement of Common Ground with Norwich City Council is not achievable given their lack of engagement with the process.
4. The Summary of oral submissions for ISH1 can be found in **Table 1-2**.

**Table 1-1** *Written summary of the Applicant's oral submission at ISH 2*

I.D.	Examining Authority Question	Applicant Response
<b>3 Development Scenarios</b>		
3.i	<p>On the question of clarification on when the preferred scenario would be decided; the process of consultation, notification and any related consents; if the chosen scenario could change; where this process is clarified and assessed and/or secured within the Environmental Statement, draft Development Consent Order and Deemed Marine Licenses:</p>	<p>A) The Applicant confirmed that the initial view when the Sheringham Extension Project (SEP) and the Dudgeon Extension Project (DEP) were being considered was that, given the separate ownership of these entities, SEP and DEP would have been entirely separate projects. This would have meant separate cable routes and substations and there would have been uncertainty about when those projects would have been constructed. In light of the increasing encouragement from the UK Government to coordinate projects and in recognising the commercial benefits, the idea of having SEP and DEP in one application was formed. Whilst there have been a number of examples of more than one project in an application, those have been in the same ownership group and given there are two separate ownership groups for SEP and DEP this takes a different approach.</p> <p>B) The Applicant reiterated that the preferred outcome is to choose the fully integrated option but in reality the Applicant is not in a position to dictate that decision. External factors are involved, such as the outcomes of the Contract for Difference (CfD) process. The Applicant has been engaging with the offshore transmission network review process as a pathfinder project to maximise the chance of building out with an integrated approach. However, it continues to be the case that the Applicant requires the different scenarios to be available and the decision of which scenario is to be pursued will not be made before the end of the Examination or the determination by the Secretary of State.</p> <p>C) The Applicant confirmed it chose to set out all of the scenarios in full to demonstrate that they have been assessed. The Applicant has also included an option for a fully integrated scenario which has not been provided for in other offshore wind development consent orders (DCOs).</p>

I.D.	Examining Authority Question	Applicant Response
		<p>D) The Applicant confirmed decision-making that will go into the choice of scenario consists of a complex and balanced process. A range of factors will be considered with the CfD outcome being the most influential. A DCO is required to bid into the CfD process so securing that will be a pre-condition of bidding into the process. There are other elements to the CfD process which may change, for example to allow two projects with separate ownership to bid together. The timing of this change is not certain but the Applicant confirmed it is aware the change has been proposed. Once CfD is secured there is a range of other considerations which will be taken into account.</p> <p>E) The Applicant confirmed it has assessed the full impacts of the project as proposed and is entitled to make an application for a DCO within the limitations of the system whilst meeting its commercial needs. The commercial needs are set out fully in document 9.28 Scenarios Statement [APP-314]. The Applicant confirmed it is not aware of any precedent for a DCO which compels the undertaker to make a particular choice as the Examining Authority (ExA) suggested in the ISH2 and doing so would inappropriately penalise the Applicant for seeking to facilitate a coordinated approach as a preferred option. The Applicant explained it would strongly resist the inclusion of any such requirement in the Order or amendment to exclude any scenarios.</p> <p>F) The Applicant confirmed there would be no consultation on the process of choosing which scenario to pursue or the decision itself.</p> <p>G) The Applicant confirmed the draft Order currently does not include wording to allow for the choice of scenario to change and will consider further if such wording is required. The Applicant stressed that this was an unlikely occurrence but did not want to rule out the possibility should it be necessary. [Post-hearing note: See further the Applicant's response to WQ 1.6.1.1 within <b>The Applicant's responses to the Examining Authority's First Written Questions</b> [document reference 12.4] submitted at Deadline 1.</p>

I.D.	Examining Authority Question	Applicant Response
		<p>H) The Applicant confirmed it would provide a note on the process for making the choice on scenario, and information on the impacts of a change to give comfort to the ExA that it has been assessed. [Post-hearing note: Details have been provided in the Applicant's response to WQ 1.6.1.1 within <b>The Applicant's responses to the Examining Authority's First Written Questions</b> [document reference 12.4] submitted at Deadline 1.</p>
3.ii	<p>On the question of whether the Draft Development Consent Order allows the construction of both Sheringham Shoal Offshore Wind Farm Extension Project and Dudgeon Offshore Wind Farm Extension Project in isolation from each other but with some cross over period (so neither concurrently or sequentially) and if so, if this has been assessed in the Environmental Statement:</p>	<p>A) The Applicant confirmed the meaning of concurrent includes construction where there is some cross over (only) through to construction where there is full cross over. The Environmental Statement (ES) has assessed the full temporal spread of works and also the maximum peaks on that basis.</p> <p>B) The Applicant confirmed it would clarify whether the ES assessed one project being at the end of construction and the other starting again at landfall. [Post-hearing note: Please see the Applicant's response to WQ 1.6.1.2 in <b>The Applicant's Responses to the Examining Authority's First Written Questions</b> [document reference 12.4] submitted at Deadline 1.]</p>
3.iii	<p>On the question of the practicalities and the effects of the proposed approach, in relation to the sequential scenario, the level of excavated material set out in the Environmental Statement [APP-103, Table 17-2] which suggests that haul roads and compounds would be completely restored by the first project and then provided again for the second project:</p>	<p>A) The Applicant confirmed it assessed the worst case scenario (WCS) to be such that the first project would reinstate the land after construction and would then need to start works all over again.</p> <p>B) The Applicant confirmed there is a possibility that a decision on whether to build the second project will not have been made at the time the first project completes its construction. The Applicant confirmed there could be a gap between the first project commencing and the second project <u>commencing</u> of up to four years. The Applicant confirmed it would consider the drafting of Requirement 1 and whether it accurately reflects the position in the ES. [Post-hearing</p>

I.D.	Examining Authority Question	Applicant Response
		<p>note: On the basis of the Applicant's responses to WQ1, the Applicant does not consider any change is required to Requirement 1.]</p> <p>C) The Applicant confirmed that specific commencement of both projects (if both were to be constructed) would need to be done i.e. commencing one project would not automatically commence the other, in the scenarios of separate development.</p>
<b>4 Construction Effects - Onshore</b>		
4.i	On the question of the applicant's approach and proposed timescale for the completion of drafts of management plans in the Outline Code of Construction Practice, and discussion if these should be provided during the examination:	A) The Applicant confirmed it understood the Environmental Management Plans (EMPs) listed in Table 1-1 of the <b>Outline Code of Construction Practice</b> [APP-302] (CoCP) is the list of plans which are not otherwise secured via another route. However, the Applicant confirmed it would review this list and explain where documents are secured. [Post-hearing note: Further details are provided in <b>The Applicant's Responses to the Examining Authority's First Written Questions</b> [document reference 12.4] (see response to WQ 1.6.6) submitted at Deadline 1. The Applicant can confirm that the Code of Construction Practice (and EMPs detailed therein) is secured by Requirement 19 of the <b>draft DCO (Revision C)</b> [document reference 3.1].]
4.ii	On the question of whether the Outline Code of Construction Practice includes all necessary mitigation and sufficient detail:	A) The Applicant confirmed, in taking the approach it has, consideration has been given to the balance of information to be provided at this stage in the outline CoCP and what should be set out at the detailed design stage. The Applicant confirmed it would consider this point further and provide a more detailed response. [Post-hearing note: Further details are provided in <b>The Applicant's Responses to the Examining Authority's First Written Questions</b> [document reference 12.4] (see response to WQ 1.6.6) submitted at Deadline 1.
4.iii	On the question of details of the ground investigation campaign at the landfall and whether there is any uncertainty about the use of Horizontal Directional Drilling, including the location of a former sewage works at landfall:	A) The Applicant confirmed it has a good level of knowledge about ground conditions at landfall due to information gathered from the Sheringham Shoal and Dudgeon Offshore Wind Farms. The Applicant confirmed it



I.D.	Examining Authority Question	Applicant Response
		<p>has a high degree of confidence in the proposed use of horizontal directional drilling (HDD) at landfall.</p> <p>B) The Applicant confirmed regarding the potential effects of the sewage works within the cable corridor that historical mapping taken in 1999 confirms that the Transition Joint Bay (TJB) is outside of the sewage works. The Applicant will confirm where in the ES the assessment of risk of potential contaminant impacts from this sewage works have been detailed. [Post-hearing note: ES <b>Chapter 17 Ground Conditions and Contamination</b> [APP-103, Section 17.6.1] discusses the risk of potential sources of contamination within the study area.] The Applicant confirmed that if contaminants were discovered, they would be dealt with in the usual way for such a construction project. [Post-hearing note: Further details are provided in the Applicant's response to WQ 1.6.2.1 in <b>The Applicant's Responses to the Examining Authority's First Written Questions</b> [document reference 12.4] submitted at Deadline 1.]</p>
4.iv	On the question of justification for the cable corridor width for trenched and trenchless crossings:	<p>A) The Applicant confirmed that its general approach to selection of the cable corridor has been to consider features on the land in relation to which the Applicant may need to micro-site around. For example, topography, trees, hedgerows and local features.</p> <p>B) The Applicant confirmed that plate 4-17 to plate 4-19 of ES <b>Chapter 4 – Project Description</b> [APP-090] show working easements for the construction of SEP and/or DEP which also include drainage. The Applicant confirmed that the difference between the widths of the working easements and the order limits is to allow for micro-siting needs as a further mitigation of impacts to local features.</p> <p>C) The Applicant confirmed that there are commitments within the <b>Outline Ecological Management Plan</b> [APP-304] (oEMP) and 9.18 <b>Outline Landscape Management Plan</b> [APP-303] (oLMP) to reducing cable corridor width to 20 meters, for example where there are hedgerow crossings as described in document 6.3.4.1 <b>Crossing Schedule</b></p>

I.D.	Examining Authority Question	Applicant Response
		<p><b>(Revision B)</b> [AS-022]. The Applicant confirmed it would provide further detail regarding the reason for not defining top-spoil and sub-soil storage areas at intervals along the corridor. [Post-hearing note: The Applicant has provided further detail in response to WQ 1.6.2.2(c) within <b>The Applicant's Responses to the Examining Authority's First Written Questions</b> [document reference 12.4] submitted at Deadline 1.]</p> <p>D) The Applicant confirmed the cable corridor needs to be 100 metres in width where there are trenchless crossings. Each of these crossings requires a detailed design but the Applicant has allowed for flat formation which is one of the possible configurations. Depending on the length of the drill as well as ground conditions, there may need to be up to 10 metres between circuits to keep them thermally independent so 100 metres is required as a result of the two projects plus contingencies for each project. The Applicant confirmed it would provide a schematic for this approach. [Post-hearing note: This has been provided as Appendix A.5 in <b>Appendix A – Supporting Figures for the Applicant's Responses to the Examining Authority's First Written Questions</b> [document reference 12.4.1] submitted at Deadline 1.]</p> <p>E) The Applicant confirmed in relation to the 550m long trenchless crossing at Oulton that there is a solar farm which is still within its permitting process and the plans for the solar farm are subject to change. The Applicant confirmed it has accounted for the possibility for the different constructions of that solar farm. The final length would be determined at the detailed design stage. The Applicant confirmed it would provide further detail regarding the proposed depth of the trenchless crossing at this point.</p>
<b>5 Land Use</b>		
5.i	On the question of the impact on Agri-environment Schemes [APP-105] and what work has been done to date to reach landowner agreements:	A) The Applicant confirmed document 6.1.19 Environmental Statement <b>Chapter 19 - Land Use, Agriculture and Recreation</b> [APP-105] assessed the impacts on Agri-environment Schemes. The study area

I.D.	Examining Authority Question	Applicant Response
		<p>crosses two higher stewardship countryside schemes and 10 middle stewardship countryside schemes and 16 entry level stewardship countryside schemes. The actual effect would depend on the extent and duration of construction works and terms of agreements with the landowners affected so the actual impacts will only be known when landowner agreements are in place.</p> <p>B) The Applicant confirmed that its primary approach has been to avoid impacts on Agri-environment Schemes. However, where that has not been possible the ES has assessed that impacts will range from no impacts, minor or temporary changes through to termination of the scheme. Affected landowners will be consulted to enable them to liaise with the Rural Payment Agency. This will include compensation where appropriate. During the operational phase the cable corridor and landfall will be reinstated to their original condition and it should be possible to manage the land under those schemes again resulting in a conclusion of no likely significant effects.</p> <p>C) The Applicant confirmed that landowner agreements are under negotiation and provide for compensation. The Applicant confirmed it hopes these agreements can be completed. If compulsory acquisition powers have to be used, landowners would be compensated under that regime.</p>
5.ii	On the question of whether an agricultural land survey to determine whether land associated with the onshore substations is Grade 3a or 3b is required:	<p>A) The Applicant confirmed it has relied on desk based sources which have identified the land associated with the onshore substations as Grade 3 and information as to whether the soil is Grade 3a or 3b is not available through those sources. The Applicant assumed the WCS that the land was Grade 3a and this was accounted for in the site selection process. The Applicant confirmed that given the WCS has been assessed, undertaking the soil surveys to confirm whether the land is Grade 3a or 3b soil would not affect the outcome. These surveys should not, therefore, be considered to be mitigation for land use impacts at the onshore substations site. The Applicant confirmed the</p>

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		<p>moderate adverse impact would need to be weighed by the ExA in the planning balance as the substation footprint will not change.</p>
5.a	<p>In response to a request from Derek Aldous</p>	<p>The Applicant confirmed it would state in writing what the total agricultural land area to be affected temporarily and permanently would be.</p>
<p><b>6 Noise and Vibration</b></p>		
6.i	<p>On the question of whether the baseline survey methodology is adequate and the justification for not undertaking baseline noise surveys at sensitive receptors along the onshore cable route, including receptors around the main construction compound:</p>	<p>A) The Applicant confirmed it has not undertaken baseline noise surveys at receptors along the cable corridor and this approach was agreed with by the expert topic group. Instead the Applicant has assumed that all receptors are “Category A” as this automatically applies the lowest possible threshold value for the onset of significant effects from construction noise. The WCS has, therefore, been assessed. This is set out in document 6.1.23 Environmental Statement <b>Chapter 23 - Noise and Vibration</b> [APP-109].</p> <p>B) The Applicant confirmed it predicted noise emissions from the temporary construction compound (TCC) which is described in document 6.3.23.3 Environmental Statement <b>Appendix 23.3 - Construction Noise Assessment</b> [APP-266]. It assumes a temporary impact from construction noise at the TCC. Daytime, evening and weekend noise impacts are predicted to be low magnitude. If the TCC is used at night the noise impacts would be high magnitude without mitigation. Propose mitigation includes screening around the compound, which would reduce the night-time impacts to low magnitude. The Applicant confirmed it is appropriate to treat noise from the TCC as construction noise for the purposes of applying the noise thresholds. Construction noise is inherently noisy and takes place over a temporary period.</p>
6.ii	<p>On the request for an explanation of the assumption of a Category A threshold value along the onshore cable route:</p>	<p>A) The Applicant confirmed it would provide further detail in writing to justify its position with regards to consideration of noise impacts along the onshore cable route.</p>

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6.iii	On the question of the justification for the location of identified sensitive receptors at landfall and whether all residential receptors have been identified along the cable corridor, including Avenue Farm, Bodham:	<p>A) The Applicant confirmed the chosen receptors at landfall represent the WCS. Receptor LFL1 is the WCS (see Sheet 1 of Figure 23, document 6.2.23 Environmental Statement <b>Chapter 23 Figures - Noise and Vibration</b> [APP-133]). At this location, impacts from landfall works are considered negligible during the daytime, evening and weekend periods and low during the night. Other noise receptors are further away from the landfall works so impacts would be lower (and effects also not significant).</p> <p>B) The Applicant noted it is not typical for projects like these to identify all residential receptors along a proposed cable corridor. The Applicant selected receptors which they considered to represent the WCS and based the assessment on these. Avenue Farm, although close to CCR8 (which was in the assessment) was further from the cable corridor so was considered to have lower impacts. Including Avenue Farm in the assessment would not have affected the outcome.</p> <p>C) The Applicant confirmed that noise mitigation measures are determined as part of the Code of Construction Practice. The process would require the contractor to consider all of the potentially affected residences, for example through additional predictions, and whether mitigation for these residences was required based on what construction works were to be carried out. The Applicant confirmed it would provide further detail in respect of how it could be ensured that mitigation was to be delivered at all affected residences.</p>
6.iv	On the question of why the cumulative noise assessment from construction traffic only considers the Sheringham Shoal Offshore Wind Farm Extension Project and Dudgeon Offshore Wind Farm Extension Project concurrent scenario:	<p>A) The Applicant referred to section 23.2.4 in document 6.3.23.3 Environmental Statement <b>Appendix 23.3 - Construction Noise Assessment</b> [APP-266] which notes that of the 182 road links which will be used by the construction of SEP and DEP, only 63 will also be used by other projects considered in the cumulative assessment which is why cumulative impacts were assessed on only 63 links. The Applicant confirmed the WCS for those 63 links was the concurrent scenario.</p>

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6.v	On the question of whether sequential construction activities being undertaken could cumulatively result in noise levels over the Threshold Value for 10 days in any given 15 days [APP-109, Paragraphs 150-155]:	A) The Applicant clarified with the ExA that 'sequential' in this context means, by example, if a haul road was constructed and immediately after that another activity started. The Applicant confirmed that in this context, works will be in 1km sections which would lead to 4 weeks of construction for all scenarios. The Applicant confirmed it does not anticipate a situation in which the works would result in more than 10 days in any 15 as the works progress along the cable route at 250m per week.
6.vi	On the question of whether identified moderate and major adverse impacts during construction activities, including during the night-time period from trenchless crossing works can be sufficiently mitigated:	<p>A) The Applicant confirmed that the assumptions used to assess construction impacts may have been overly-conservative. For example, the WCS approach was to assume the possibility of work during the night-time but this will only be the case where long drills are needed.</p> <p>B) The Applicant confirmed it would provide further detail in writing about mitigation for noise impacts.</p> <p>C) The Applicant confirmed it would address noise impacts in the Statement of Common Ground (SoCG) with North Norfolk District Council.</p>
<b>7 Traffic and Transportation</b>		
7.i	On the question of the Applicant's methodology of looking at sensitive links on the local road network and the adequacy of the assessment of potential adverse effects at junctions on the local road network:	<p>A) The Applicant confirmed that it has engaged with Norfolk County Council (NCC) to identify roads of particular concern, which is around 50 per cent of the local road network. The Applicant then carried out an assessment of these. The assessment included consideration of a number of different impacts. Mitigation was outlined accordingly.</p> <p>B) The Applicant confirmed that junctions were assessed as part of the traffic assessment, both junctions on the strategic road network and on the local road network. For the strategic road network the Applicant confirmed it undertook junction modelling. A different approach is used for the local road network (recognising the extent of the study area and need to present a proportionate assessment) which looks at the hourly</p>

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		change in traffic and whether this is material. This included junctions within the assessed links.
7.ii	On the question of the current position with highway improvement schemes close to the Proposed Development (A47 North Tuddenham to Easton Development Consent Order and A47-A11 Thickthorn Junction Development Consent Order) and whether severe traffic and transport impacts on the A47 can be avoided in their absence:	<p>A) The Applicant confirmed its assessment was based on a WCS in which the road improvement schemes consented by the A47 North Tuddenham to Easton Development Consent Order and A47-A11 Thickthorn Junction Development Consent Order did not come forward in time for commencement of SEP and DEP. The Applicant confirmed that based on this assumption, there are significant impacts predicted (without mitigation) but should the two road schemes come forward in advance of commencement, those significant impacts would no longer be present. In the event the road schemes are not delivered, there are mitigation measures to avoid significant effects (see document 9.16 <b>Outline Construction Traffic Management Plan</b> (oCTMP) [APP-301]).</p> <p>B) The Applicant confirmed the same approach (outlined in A) has been applied to the Norwich Western Link road improvement scheme.</p> <p>C) The Applicant confirmed that the approach agreed with NCC and National Highways was to manage potential cumulative construction impacts through the Construction Traffic Management Plan which is secured in Requirement 15 of the <b>draft Order (Revision B)</b> [AS-009] and collaboration between the road schemes and SEP and DEP. The Applicant confirmed it is engaging with National Highways and Norwich Western Link about coordination.</p>
7.iii	On the question of how the proposed mitigation to limit vehicles movements to agreed 'caps' on some links will work in practice across other projects and what discussions/agreements have been reached with other developers, in this regard:	<p>A) The Applicant noted that 'caps' were agreed between Orsted and Vattenfall and NCC as a mechanism for managing cumulative impacts along a number of roads affected by Norfolk Boreas, Norfolk Vanguard and Hornsea Project Three. The Applicant confirmed that in the event there is overlap of the construction periods with these other projects it will work within those 'caps' and the management of that process is detailed in the <b>oCTMP</b> [APP-301].</p>

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		<p>B) The oCTMP outlines that the Applicant has committed to appoint a Construction Traffic Management Plan Co-Ordinator to assist with coordination with other projects and will undertake forecasting, all to ensure the Applicant remains below the 'caps'. The Applicant advised that average flows are considerably lower than peaks flows so there is flexibility to work within the 'caps' by managing activities.</p> <p>C) The WCS for the cumulative assessment was to use the Norfolk Vanguard traffic flows in the scenario in which they install the Norfolk Boreas ducts as this would be the highest number of overall traffic movements. The Applicant confirmed it would clarify how Norfolk Boreas had been included in the traffic cumulative impact assessment. [Post-hearing note: The Applicant has provided further rationale within <a href="#">The Applicant's Responses to the Examining Authority's First Written Questions</a> [document 12.4] submitted at Deadline 1.]</p>
7.a	In relation to concerns raised by Oulton Parish Council / Attlebridge IP regarding access to the secondary and main compounds respectively.	The Applicant confirmed that NCC have agreed access to the compounds in principle. Access plans for the compounds which were shared with NCC include measures to address road safety concerns. The Applicant also confirmed that the nearby traffic generators in proximity to the compounds are included in the baseline.
7.b	In relation to concerns raised by Sandra Betts regarding displaced traffic impacts.	The Applicant confirmed that if road closures due to the proposed A47 improvement works lead to diversions on the local road network, the Applicant would work with National Highways to programme works accordingly to ensure displaced traffic impacts are not exacerbated.
7.c	In relation to concerns raised by Jonathan Betts regarding the enforcement of 'caps'	The Applicant confirmed the oCTMP sets out the detail in terms of measures, monitoring and enforcement.
<b>8 Water Quality and Resources</b>		



I.D.	Examining Authority Question	Applicant Response
8.i	On the question of the relevance of recent revisions to the Flood risk and coastal change section of the Government's Planning Practice Guidance to the Proposed Development:	A) The Applicant confirmed that the PPG is relevant to the decision.
8.ii	On the question of the application of the sequential test and whether this has been applied robustly before the exceptions test:	A) The Applicant confirmed it believes it has properly applied the sequential test. The Applicant confirmed it would provide a note containing further detail in relation to this item. [Post-hearing note: See <a href="#">Flood Risk and Planning Policy Guidance Technical Note</a> [document reference 13.8] submitted at Deadline 1
8.iii	On the question of whether there is sufficient information for the Examining Authority to be confident that surface water can be suitably managed at the proposed substation site, including the potential for upgrades to be required to the Anglian Water foul water sewer infrastructure:	A) The ExA noted that this agenda item fell away following the letter from the Applicant [AS-036] advising the ExA of a potential change request.
8.iv	On the question of whether the Environmental Statement is justified in selecting the concurrent scenario as the worst-case for potential impacts 'Increased sediment supply' and 'Supply of contaminants to surface and groundwaters':	A) The Applicant confirmed it considered, in relation to increased sediment supply and supply of contaminants to surface and ground waters, both the concurrent and sequential construction scenarios when undertaking its assessment. The WCS was shown to be the concurrent scenario. The Applicant noted there are no significant effects predicted after mitigation is taken into account.
8.v	On the question of whether it is appropriate to undertake site-specific hydrogeological risk assessments and produce crossing methodologies post-consent or if these must be in Examination:	A) The Applicant confirmed it believed these can be undertaken post consent. The Applicant confirmed it has undertaken some ground investigation. Further, the commitments to using trenchless techniques at all main rivers and in other locations (see the Crossing Schedule) offers mitigation. Paragraph 104 in the oCoCP addresses this point.
<b>9 Landscape</b>		
9.i	On the question of the parties' view on the Applicant's Landscape Visual Impact Assessment, assessment of landscape effects during construction and operation of the Proposed Development, and the proposed mitigation	A) The Applicant noted that the comments of NCC, North Norfolk District Council (NNDC), South Norfolk District Council (SNDC) and Broadland District Council (BDC) in response to this question were consistent with the Applicant's engagement with these parties.

I.D.	Examining Authority Question	Applicant Response
	measures for these effects; identifying areas where they may not be in agreement with the Applicant's approach:	<p>B) In response to the ExA's recognition of the National Trust's concerns about what landscape, arboricultural and ecological mitigation is proposed, the Applicant noted that the majority of work to be carried out on National Trust land is trenchless crossing works. The Applicant confirmed impacts are in relation to the removal of poor quality forestry trees in that area and will ensure biodiversity enhancements are provided. Further details of these are set out in the oEMP and oLMP.</p> <p>C) In response to the ExA's noting of the fact that some of National Trust's inalienable land is being impacted by SEP and DEP, the Applicant confirmed that in respect of this land the general rule is that the National Trust cannot agree to sell it to the Applicant and it must be acquired compulsorily. The Applicant is actively seeking National Trust's consent to this process.</p>
9.ii	On the question of the Applicant's proposed strategy for the removal and subsequent replacement of existing trees and hedgerows:	<p>A) The Applicant confirmed its process of identifying trees and hedgerows to be removed was focussed on mitigation by design. The Applicant engaged in a long consultation with interested parties and considered a large data set which included information gathered through ecological surveys, feedback from the community, photographs and site visits. The emphasis was on avoiding impacts and where that was not possible mitigating impacts. This includes allowing for micro-siting around features.</p> <p>B) The Applicant confirmed that some hedgerow loss was unavoidable but hedgerow replacement will be along the same line as the original hedgerow was. The species used in replanting is detailed in the oEMP and oLMP (which are secured in Requirements 11 and 13 of the draft Order). There will also be tree replanting within the order limits but outside the final cable easement.</p> <p>C) The Applicant confirmed it has engaged with interested parties through the expert topic groups.</p>

I.D.	Examining Authority Question	Applicant Response
		<p>D) The Applicant confirmed it believes the drafting of Articles 34 and 35 in the draft Order are sufficiently clear and will assist with the management of trees within the order limits. The Applicant confirmed that the use of 'reasonable' in this context should be given its normal meaning and would constitute a balance between doing something and doing nothing. Any abuse of the powers in these articles could lead to criminal liability.</p> <p>E) The Applicant confirmed that pre construction arboricultural surveys will provide more detail on precisely which trees will be removed and the removal of these trees form part of the oLMP.</p> <p>F) The Applicant confirmed there is ongoing engagement with NNDC and a SoCG is being progressed. The Applicant noted NNDC's comments in respect of the question around where replacement trees will be provided and to what extent. The Applicant also noted NNDC's comments regarding the assessment of important hedgerows and whether this was in line with the Hedgerows Act 1997. Finally, the Applicant noted NNDC's comments regarding a request for further clarity around the treatment of ancient and veteran trees. The Applicant confirmed it would address the points raised in the SoCG.</p> <p>G) The Applicant confirmed there is ongoing engagement with SNDC and BDC and a SoCG is being progressed. The Applicant noted SNDC's and BDC's comments in relation to the ancient and veteran tree assessment and the question around what mitigation will be in place. The Applicant also noted NNDC's comments regarding the assessment of hedgerows and in particular their historical importance. The Applicant confirmed it would address the points raised in the SoCG.</p> <p>H) In response to a question from Norfolk Parishes Movement for an Offshore Transmission Network (NPM OTN), the Applicant confirmed that Requirement 12(2) of the draft Order ensures replanting of trees and shrubs over a ten year period.</p>

I.D.	Examining Authority Question	Applicant Response
9.a	In response to a question from Derek Aldous about how a breach of the DCO would be enforced	The Applicant confirmed it would be for the relevant local planning authority to enforce on the grounds that they think it is expedient to do so.
9.iii	On the question of the potential effects of the Proposed Development on ancient woodland:	<p>I) The Applicant confirmed that a review of the database for ancient woodland was undertaken in the knowledge that this might not provide a complete picture of what was present within the scoped area. The Applicant also used aerial imagery and multiple site visits to inform the site selection of the cable corridor and avoid any woodlands as much as possible. Where it was not possible to avoid woodland, the Applicant further widened the cable corridor to allow for trenchless crossings. The Applicant is therefore confident that the cable corridor would not have a significant effect on any ancient woodland, as set out in ES <a href="#">Appendix 20.15 Arboricultural Survey Report</a> [APP-228].</p> <p>J) The Applicant confirmed that to their knowledge Ringland Covert does not comprise ancient woodland. Regardless, of its classification to mitigate and reduce any impact on this area, trenchless crossings are proposed.</p>
9.b	In response to a question from Derek Aldous regarding precedent for enforcement of a DCO and the monitoring mechanisms	The Applicant confirmed it was not specifically aware of enforcement having been taken on a previous DCO but that its knowledge of that was limited. The Applicant also confirmed the monitoring mechanisms are in line with the normal planning system whereby members of the public have the ability to make complaints to the relevant local planning authority, which then decides whether or not to enforce.
<b>10 Seascape</b>		
10.i	On the question of the existing baseline and its effect on the statutory purpose of the Norfolk Coast Area of Outstanding Natural Beauty:	A) The Applicant confirmed that the correct approach to assessing the baseline is to include existing wind farm developments and the Applicant's approach to this has therefore been correct. The Applicant notes Natural England's comment that the baseline should not include existing wind farm developments is unusual.

I.D.	Examining Authority Question	Applicant Response
10.ii	<p>On the question of the extent of additional harm to the Norfolk Coast Area of Outstanding Natural Beauty which would result from the Proposed Development (agenda item 10.ii) and the question of the need, or otherwise, for a Cumulative Impact Assessment to be undertaken in relation to the impact of the Proposed Development on the statutory purpose of the Norfolk Coast Area of Outstanding Natural Beauty:</p>	<p>A) The Applicant confirmed it has assessed the impacts on landscape character and views in document 6.1.25 Environmental Statement <b>Chapter 25 - Seascape and Visual Impact Assessment</b> [APP-111]. The assessment concluded there was moderate adverse effects on landscape character and views within the Norfolk Coast Area of Outstanding National Beauty (NCAONB), for example there are significant effects on views from a viewpoint on Peddars Way when the cumulative impacts of SEP and DEP are considered.</p> <p>B) The Applicant confirmed that it has undertaken an additional assessment in relation to the impacts on the NCAONB which includes a cumulative impact assessment (document 9.25 <b>Impacts on the Qualities of Natural Beauty of Norfolk Coast Area of Outstanding Natural Beauty</b> [APP-311]). This considered impacts on the special qualities of natural beauty (QNBs) which include multiple features of natural beauty such as ecology and landscape character. There are seven QNBs identified for the NCAONB. It was agreed through the expert topic group that three of the seven QNBs were particularly relevant for the assessment of impacts on the NCAONB. One of these QNBs (number 3 - Diversity and Integrity of Landscape, Seascape and Settlement Character) was impacted by the construction of Sheringham Shoal to the extent it was noted in the 2014 NCAONB Management Plan (which was produced by the NCAONB Partnership) as having changed from a 'green' rating to an 'amber' rating. This change did not, however, indicate there was an issue with the integrity of the overall NCAONB. Further, the 2014 NCAONB Management Plan noted impacts on another relevant QNB (number 6 - Sense of Remoteness, Tranquillity and Wildness) but not to the extent it was considered to be an issue with regards to the integrity of the overall NCAONB. The Applicant confirmed that its cumulative impact assessment for the NCAONB did not find that any of the three relevant QNBs were affected to the extent the integrity of the overall NCAONB was impacted and no significant adverse effects were found in relation to the NCAONB.</p>

I.D.	Examining Authority Question	Applicant Response
10.iv	On the question of the factors which may prevent agreement between parties on the significance of effects and the likelihood of agreement being reached during the course of the Examination:	A) The Applicant noted NE's relevant representation and their position regarding the unlikelihood that agreement will be reached with the Applicant on significance of effects. The Applicant also noted that there is little difference between the parties and the difference is a matter of expert judgement. The Applicant fundamentally disagrees with NE's position that existing wind farm development should be excluded from the baseline and that its approach is correct. The Applicant also disagrees with NE's approach to assessing seascape impacts using a calculation to assess the apparent heights of turbines based on the curvature of the earth. The Applicant has relied on field-based studies which has led to a difference of conclusions with regards to impacts.
<b>11 Design</b>		
11.i	On the question of the suitability and adequacy of the Applicant's approach to design to cover: landfall design, cable corridor design, substation design and the offshore wind farm infrastructure:	<p>A) The Applicant confirmed its approach to design has been suitable and adequate and SEP and DEP represent good design. The approach has been grounded in an understanding which has been supported by extensive baseline surveys undertaken by multiple relevant experts, for example surveys of biodiversity, settlements and landscape character. The design development process has been undertaken along the environmental impact assessment process in an iterative way. For instance, the cable corridor has been refined based on a number of factors including design.</p> <p>B) The Applicant confirmed the <b>Design and Access Statement</b> [APP-287] (DAS) contains a summary of each of the components that have fed into the design process and sets out the design principles for SEP and DEP. The outcome is that those design principles manifest in other documents including the oLMP and oEMP, which is an example of the design intent being delivered. The Applicant confirmed the DAS is concerned with operational development. Design elements during construction will be controlled by the relevant local planning authority through the approval of plans.</p>

I.D.	Examining Authority Question	Applicant Response
11.ii	On the question of if the proposed principles for good design and the design outcomes for: landfall design, cable corridor design, substation design and the offshore windfarm infrastructure, are adequately defined and committed:	<p>A) The Applicant engaged in a structured design process with stages involving feasibility studies, option appraisals, indicative design stages and so on. Parameters were continually updated. This has involved the full range of professionals that would be expected, for example engineers and landscape architects. Every topic from the ES has been engaged in the design process. The Applicant has had overall control of the design process and has sought to balance technical requirements with good design and reduction of impacts. The Applicant has demonstrated leadership and support for good design within the remit of delivering a functional infrastructure project.</p> <p>B) The Applicant noted some of the design principles which have been detailed further in the DAS such as undertaking colour studies to ensure the colour of materials is influenced by the colour of the surroundings.</p> <p>C) The Applicant confirmed it has considered a design review process and does not believe it is necessary or appropriate in the circumstances. Given the low level of landscape effects arising from the substation there has not been a need for a design review, nor have stakeholders requested one. Further, the substation is a functional building and there is limited ability to influence its design beyond the important design decisions that have already been made through site selection. Other important project decisions, for example the decision to lay the cable route underground, represent significant and beneficial design decisions which have already been taken. The Applicant confirmed it is comfortable that this approach is policy compliant.</p>
11.iii	On the question of proposed Design Principles for substation design to cover all development scenarios:	<p>A) The Applicant confirmed it would respond to this in writing. [Post-hearing note: The Applicant has provided details within its response to WQ 1.10.1.2 and WQ 1.10.1.3 in <b>The Applicant's Responses to the Examining Authority's First Written Questions</b> [document reference 12.4] submitted at Deadline 1.]</p>

I.D.	Examining Authority Question	Applicant Response
11.iv	On the question of if the proposed approach [APP-287] [APP-312] [APP-313] would meet the policy requirements in National Policy Statement EN-1 Section 4.5 relating to sensitivity to place and contributing to the quality of the area in which it would be located:	A) See 11.i above.
11.v	On the question of how the design and vision documents are currently secured:	A) The Applicant confirmed that detailed design parameters are secured in the draft Order. For example, in Requirements 2 and 10 and in Conditions 1 – 3 in Schedules 10 and 11 and Conditions 1-2 in Schedules 12 and 13. In addition, the DAS sets out the design guidance which is secured in other Requirements. . For example, the DAS sets parameters for the onshore substation, stating, amongst other things, that it will be simple form and this form is subject to approval under Requirement 10(4). There is additional design guidance for security fencing, the details of which will be approved under Requirement 14. Whilst the Applicant did not have the opportunity to explain all the ways in which it considers the existing drafting within the draft Order secures the design and vision documents, it confirmed that it would consider this further. [Post-hearing note: see responses to WQ 1.10.2.1 and 1.11.5.3 in <a href="#">The Applicant's Responses to the Examining Authority's First Written Questions</a> [document reference 12.4] submitted at Deadline 1.]
11.vi	On the question of the Applicant's proposed iterative design development process post consent (if consent is granted), engagement with parties, and how that can be secured:	A) The Applicant confirmed it would respond to this in writing. [Post-hearing note: The Applicant has provided details within its response to WQ 1.10.2.1 in <a href="#">The Applicant's Responses to the Examining Authority's First Written Questions</a> [document reference 12.4] at Deadline 1.
11.a	In response to a question from Derek Aldous about whether the Applicant was able to secure ecological enhancements outside of the order limits	The Applicant confirmed that all ecological enhancements are being delivered within the order limits. In response to a question from Derek Aldous as to whether the impacts of glint have been considered, the Applicant



I.D.	Examining Authority Question	Applicant Response
		confirmed glint is not an issue for substations and is more typical of impacts from solar farms. In response to a question from Derek Aldous as to whether the design principles would cover works within the National Grid substation upgrade, the Applicant confirmed that no works are being undertaken which will become part of National Grid's infrastructure.
11.b	In response to a question from Louise Staples about the size and frequency of link boxes,	The Applicant confirmed link boxes will be largely underground and the details of the over ground elements are detailed in the Environmental Statement Chapter 4 Project Description. This includes details of frequency at around 1km intervals [Section 4.6.1.3.7, paragraphs 301 and 302].
<b>12 Cumulative Effects</b>		
12.i	On the question of whether the approach of the Environmental Statement to cumulative effects assessment, namely the high-level approach to some subject areas where it is assumed other projects will mitigate their own impacts, is suitably robust:	A) The Applicant confirmed that version 2 of Planning Inspectorate Advice Note Seventeen: Cumulative Effects Assessment (PINS, 2019a) has been taken into account in the CIA, and referred to document 6.1.5 Environmental Statement <b>Chapter 5 - EIA Methodology</b> [APP-091]. The Applicant confirmed that section 5.8 sets out the overall approach to cumulative impact assessment (CIA) and each ES chapter then assesses impacts in respect of that topic. In line with Renewable UK CIA guidelines (RenewableUK 2013) the confidence levels applied to other projects depends on what information is available. Only those other projects which are well described can be included in a meaningful CIA. Within each topic chapter, the Applicant has screened all other projects, a process which was agreed with stakeholders through pre-application consultation. The Applicant has also followed the industry-wide approach by focusing on residual effects as identified in the assessments for other projects. This assumes that any other project consented must have acceptable impacts, therefore effects are either negligible or acceptable (not significant) post-mitigation. The Applicant is not aware of any guidance which suggests unmitigated effects should be considered. The Applicant has also assumed that all other projects will follow minimum legal requirements. Disregarding mitigation when considering the effects of other projects would be likely to result in a significant overestimation of the potential cumulative

I.D.	Examining Authority Question	Applicant Response
		<p>impact to the extent that it would be unrealistic. CIA does involve a number of uncertainties including robustness of data and that has to be weighed in the balance. In line with PINS Advice Note 17, the assessment should be proportionate to the effect being assessed and a precautionary but pragmatic approach should be used. For these reasons the Applicant confirmed it believes its CIA has been robust.</p> <p>B) In response to comments raised by the NPM OTN, the Applicant referred the NPM OTN to the conclusions of the CIA section 27.7.3 of document 6.1.27 Environmental Statement <b>Chapter 27 - Socio-Economics and Tourism</b> [APP-113].</p>
12.ii	On the question of the justification for excluding the Norfolk Boreas Project in some of the cumulative effects assessments, most namely traffic and transport and noise and vibration:	A) See 7iii(c) above.
<b>13 Draft Development Consent Order</b>		
13.i	On the question of how the activities currently excluded in the definition of commence are controlled, monitored and mitigated; the need for a definition for pre-commencement works and an accompanying management plan:	<p>A) The Applicant confirmed it does not consider it necessary to include a definition of pre-commencement works. The drafting of the definition of “commence” has followed the precedent in Norfolk Boreas and Norfolk Vanguard. The Applicant confirmed it believes this and the Requirements are suitable for controlling pre-commencement activities, for example any accesses required for pre-commencement archaeological investigations require a specific traffic management plan for the relevant access under requirement 15(4). Further, a separate pre-commencement works management plan is not considered necessary as the pre-commencement activities are sufficiently controlled by Requirements. [Post-hearing note: See further update within the Applicant’s response to WQ 1.11.2.2 in <b>The Applicant’s Responses to the Examining Authority’s First Written Questions</b> [document reference 12.4] at Deadline 1.]</p>

I.D.	Examining Authority Question	Applicant Response
13.ii	On the question of the explanation of “phase” of the Proposed Development as defined in Article 2, in Requirement 9, and the Environmental Statement; the meaning of the words “part” and “stage” in the definition of “phase”:	<p>A) The Applicant confirmed “part” and “stage” are considered to be interchangeable descriptions for “phase” and are included in the definition of “phase” as a descriptor of what might be considered a phase. What is considered a “phase” for the purposes of the draft Order is determined by Requirement 9. The use of the word phase in the ES is mainly in the context of referring to the construction phase, operational phase or decommissioning phase which is different.</p> <p>B) The Applicant confirmed it would consider the removal of the definition of “phase” from the draft Order. [Post-hearing note: The definition of ‘phase’ has been removed from the draft Order; see the <b>Draft Development Consent Order (Revision C) Tracked Changes Version</b> [document reference: 3.1.1] submitted at Deadline 1.]</p>
13.iii	On the question on if “to the extent assessed in the environmental statement” is an adequate bar in the definition of maintain to limit maintenance activities authorised under the draft Development Consent Order and the Deemed Marine Licenses to those that are assessed within the Environmental Statement:	A) The ExA confirmed this would be deferred to written questions.
13.iv	On the question of the need for a definition of “land adjacent to order limits”, as used in Article 4:	A) The ExA confirmed this was included in error.
13.v	On the question of the explanation of the process, due diligence and risks in Article 5 the transfer of benefits of the order to a subsidiary company:	A) The ExA confirmed this would be deferred to written questions.
13.vi	On the question of the adequacy of 14 days’ notice period for Article 16 relating to authority to survey and investigate land, given the nature of work to make trail holes and dig trenches; would the notice include an indication of the work required; and meaning of “as soon as practicable” in Article 16(5):	A) The Applicant noted that the drafting refers to “at least” 14 days’ notice so this is a minimum requirement for giving notice. The drafting is well precedented and in line with other offshore wind farms and DCOs. This drafting is not novel in the context and is in line with the equivalent statutory powers under sections 172 to 197 of the Housing and Planning Act 2016 and section 53 of Planning Act 2008.

I.D.	Examining Authority Question	Applicant Response
		<p>B) The Applicant confirmed the meaning of “as soon as practicable” is intended as it appears on its face.</p> <p>C) The Applicant confirmed it would further consider the inclusion of specific details of the surveys to be undertaken in the notice and a 28 day period for giving that notice where agri-environmental schemes are impacted. [Post-hearing note: with regards to including further details in the notice to be served under Article 16, please see response to WQ 1.11.3.6 within <b>The Applicant's Responses to the Examining Authority's First Written Questions</b> [document reference 12.4] and amendments included in the <b>Draft Development Consent Order (Revision C) Tracked Changes Version</b> [document reference: 3.1.1] both submitted at Deadline 1.]</p> <p>D) The Applicant confirmed it would not be appropriate to include a specific period for completion of reinstatement as flexibility is required for restoration in the context of the time of year during which it might be most appropriate to carry out restoration.</p> <p>E) The Applicant confirmed it would review the drafting of Article 16(1) of the draft Order and determine whether it is appropriate. [Post-hearing note: with regards to including further details in the notice to be served under Article 16, please see response to WQ 1.11.3.6 within <b>The Applicant's Responses to the Examining Authority's First Written Questions</b> [document reference 12.4] and amendments included in the <b>Draft Development Consent Order (Revision C) Tracked Changes Version</b> [document reference: 3.1.1] both submitted at Deadline 1.]</p>
13.vii	On the question of the concerns or support from parties for the provision and drafting of Article 45 Modification of DOW section 36 consent; precedence if any exists; implications for future applications for development consent order:	A) The ExA confirmed this would be deferred to written questions.
13.viii	On the question of the steps taken to mitigate any risks that surveys, findings and conclusions of the Environmental Statement might be out of date and	A) The ExA confirmed this would be deferred to written questions.

I.D.	Examining Authority Question	Applicant Response
	therefore unreliable given that Requirement 1 seeks that the time limit for commencing the authorised development would be seven years from the date on which the Order comes into force:	
13.xi	On the question of the progress with the conversations with the Ministry of Defence regarding the operation of defence sites and the drafting of Requirements 10, 27 and 28:	<p>A) The Applicant confirmed that Requirement 28 is about primary surveillance radar and the primary consultee is National Air Traffic Services (NATS). NATS have agreed to the drafting of the draft Order and the Applicant is working with them on a SoCG which the Applicant hopes to submit at Deadline 1. [Post-hearing note: The Applicant has not been able to progress a SoCG with NATS for submission at Deadline 1 despite its best endeavours to do so and will provide a further update on progress at Deadline 2.]</p> <p>B) In relation to the Ministry of Defence (MOD), the Applicant confirmed that it had engaged with the MOD during the pre-application stage and sought agreement on a form of wording. As it stands, Requirement 27 reflects wording which was agreed on other DCOs but the Applicant understands the air defence radar is due to be relocated. The MOD has confirmed that in the new location, the radar will still have impacts on line of sight from SEP and DEP. [Post-hearing note: please see response to WQ 1.4.1.2 within <a href="#">The Applicant's Responses to the Examining Authority's First Written Questions</a> [document reference 12.4] and amendments to Requirement 27 included in the <a href="#">Draft Development Consent Order (Revision C) Tracked Changes Version</a> [document reference: 3.1.1] both submitted at Deadline 1.</p> <p>C) The Applicant clarified that in respect of Condition 10 of Schedules 10 and 11 and Condition 9 of Schedules 13 and 14 (Aviation Safety), the MOD is the approving body and the drafting reflects wording which was agreed on other DCOs. The Applicant hopes the drafting of these conditions is suitable for the MOD. The Applicant will seek further engagement from the MOD on these matters at a meeting which has been arranged and will provide an update to the ExA afterwards. [Post-hearing note: please see responses to WQ 1.4.1 and 1.11.5.5 within <a href="#">The Applicant's Responses to the Examining Authority's</a></p>

I.D.	Examining Authority Question	Applicant Response
		<p><b>First Written Questions</b> [document reference 12.4] submitted at Deadline 1.</p>
13.a		<p>The Applicant confirmed the definitions which are stated in Requirements 27(2) and 28(3) are specific to those Requirements only and the Applicant does not therefore believe it is necessary to include them in Article 2.1. This follows the approach in other recent DCOs.</p>
<p><b>14 Procedural Decisions, Review of Actions and Next Steps</b></p>		
14.a		<p>The Applicant requested further details be provided in advance of the hearings due to take place in March 2023 as to what is to be discussed so arrangements can be made for topic-specific experts to be present.</p>