



**Application by Equinor New Energy Limited for an Order Granting Development Consent for the Sheringham Shoal Offshore Wind Farm Extension Project and Dudgeon Offshore Wind Farm Extension Project**

**The Examining Authority's written questions and requests for information (WQ1)**

**Issued on Friday 27 January 2023**

This document sets out the Examining Authority's (ExA) First Written Questions and requests for information (WQ1), in order to facilitate the conduct of the Examination. Responses are due by **Deadline 1, Monday 20 February 2023**.

Questions are set out using an issues-based framework derived from the Initial Assessment of Principal Issues in the Rule 6 letter, Annex C [PD-006]. The questions relate to issues as they have arisen from representations and to address the assessment of the application against relevant policies. All the post Hearing Actions from Issue Specific Hearing 1 and 2 [EV-003] [EV-005] have been included in WQ1 and these have been highlighted as such.

Column 1 sets out the unique reference number to each question which starts with 'Q1' (indicating that it is from WQ1), followed by an issue number, a sub-heading number and a question number. When you are answering a question, please start your answer by quoting the unique reference number.

Column 2 of the table indicates which Interested Parties (IPs) and other persons each question is directed to. Please provide a substantive response to the questions directed at you, or indicate why the question is not relevant to you. You may also respond to questions that are not directed at you, should the question be relevant to your interests.

If you are responding to a small number of questions, answers in a letter will suffice. If you are answering a larger number of questions, it will assist the ExA if you use a table based on this one to set out your responses. An editable version of this table in Microsoft Word is available on request from the case team: please contact [sadep@planninginspectorate.gov.uk](mailto:sadep@planninginspectorate.gov.uk) and include 'Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Project' in the subject line of your email.

**Responses are due by Deadline 1, Monday 20 February 2023.**



**List of abbreviations**

<b>AADT</b>	Annual Average Daily Traffic
<b>AEoI</b>	Adverse Effect in Integrity
<b>AEZ</b>	Archaeological Exclusion Zone
<b>ALARP</b>	As Low As Reasonably Possible
<b>ALC</b>	Agricultural Land Classification
<b>AONB</b>	Area of Outstanding Natural Beauty
<b>AP</b>	Affected Persons
<b>ASI</b>	Accompanied Site Inspection
<b>AQMA</b>	Air Quality Management Area
<b>BEIS</b>	Department for Business, Energy & Industrial Strategy
<b>BMV</b>	Best and Most Versatile
<b>BNG</b>	Biodiversity Net Gain
<b>BoR</b>	Book of Reference
<b>BDC</b>	Broadland District Council
<b>BYR</b>	Blue, Yellow and Red
<b>CA</b>	Compulsory Acquisition
<b>CA Regulations</b>	The Infrastructure Planning (Compulsory Acquisition) Regulations 2010
<b>CA Guidance</b>	Planning Act 2008: guidance related to procedures for the compulsory acquisition of land



<b>CCA</b>	Climate Change Allowance
<b>CCR2C</b>	Noise Receptor CCR2
<b>CfD</b>	Contract for Difference
<b>CIA</b>	Cumulative Impact Assessment
<b>CIL</b>	Community Infrastructure Levy
<b>CION</b>	Connections and Infrastructure Options Note
<b>CoCP</b>	Code of Construction Practice
<b>CPRE</b>	The Countryside Charity
<b>CNMP</b>	Construction Noise Management Plan
<b>dB</b>	Decibel
<b>dDML</b>	Draft Deemed Marine License
<b>dDCO</b>	Draft Development Consent Order
<b>DEFRA</b>	Department for Environment, Food & Rural Affairs
<b>DEP</b>	Dudgeon Offshore Wind Farm Extension Project
<b>DEL</b>	Dudgeon Extension Limited
<b>DEP-N</b>	Dudgeon Offshore Wind Farm Extension Project North
<b>DEP-S</b>	Dudgeon Offshore Wind Farm Extension Project South
<b>DMRB</b>	Design Manual for Roads and Bridges
<b>DOW</b>	Dudgeon Offshore Wind Farm
<b>DWPA</b>	Drinking Water Protected Area



<b>EA</b>	Environment Agency
<b>EAG</b>	East Anglia Green
<b>eDNA</b>	Environment Deoxyribonucleic acid
<b>EEAST</b>	East of England Ambulance Service NHS Trust
<b>EIA</b>	Environmental Impact Assessment
<b>EM</b>	Explanatory Memorandum
<b>EMF</b>	Electric Magnetic Field
<b>EMP</b>	Environment Management Plan
<b>EPUK</b>	Environmental Protection UK
<b>ES</b>	Environmental Statement
<b>ExA</b>	Examining Authority
<b>FTE</b>	Full Time Equivalent
<b>FRA</b>	Flood Risk Assessment
<b>FLOWW</b>	Fishing Liaison with Offshore Wind and Wet Renewables Group
<b>GCN</b>	Great Crested Newts
<b>GLVIA3</b>	Guidelines for Landscape and Visual Impact Assessment 3
<b>GVA</b>	Gross Value Added
<b>GWTMZ</b>	Greater Wash Transponder Mandatory Zone
<b>HDD</b>	Horizontal Directional Drilling
<b>HE</b>	Historic England



<b>HGV</b>	Heavy Goods Vehicle
<b>HP3</b>	Hornsea Project 3
<b>IAQM</b>	Institute of Air Quality Management
<b>IFCA</b>	Inshore Fisheries and Conservation Authorities
<b>IP</b>	Interested Parties
<b>ISH</b>	Issue Specific Hearing
<b>ISH</b>	Issue Specific Hearing
<b>km</b>	Kilometre
<b>LA</b>	Local Authority
<b>LHA</b>	Local Highway Authority
<b>LIR</b>	Local Impact Report
<b>LLFA</b>	Lead Local Flood Authority
<b>LoNI</b>	Letters of No Impediment
<b>LV</b>	Light Vehicle
<b>LVIA</b>	Landscape and Visual Impact Assessment
<b>m</b>	Metre
<b>MCA</b>	Maritime Coastguard Agency
<b>MCZ</b>	Marine Conservation Zone
<b>MEEB</b>	Measures of Equivalent Environmental Benefit
<b>MHWS</b>	Mean High Water Springs



<b>MMMP</b>	Marine Mammal Mitigation Protocol
<b>MMO</b>	Marine Management Organisation
<b>MoD</b>	Ministry of Defence
<b>NB</b>	Norfolk Boreas
<b>NCAONB</b>	Norfolk Coast Area of Outstanding Natural Beauty
<b>NCC</b>	Norfolk County Council
<b>NE</b>	Natural England
<b>NFU</b>	National Farmers Union
<b>NH</b>	National Highways
<b>NNDC</b>	North Norfolk District Council
<b>NO<sub>2</sub></b>	Nitrogen Dioxide
<b>NO<sub>x</sub></b>	Nitrogen Oxides
<b>NPPF</b>	National Planning Policy Framework
<b>NPS</b>	National Policy Statement
<b>NPS EN</b>	National Policy Statement Energy Suite
<b>NR</b>	Network Rail
<b>NRMM</b>	Non-Road Mobile Machinery
<b>NRIDB</b>	Norfolk Rivers Internal Drainage Board
<b>NSER</b>	No Significant Effects Report
<b>NSIP</b>	Nationally Significant Infrastructure Project



<b>NT</b>	National Trust
<b>NV</b>	Norfolk Vanguard
<b>OFH</b>	Open Floor Hearing
<b>OCoCP</b>	Outline Code of Construction Practice
<b>OCTMP</b>	Outline Construction Traffic Management Plan
<b>OFH</b>	Open Floor Hearing
<b>OLMP</b>	Outline Landscape Management Plan
<b>OS</b>	Ordnance Survey
<b>OSP</b>	Offshore Platform
<b>OSEP</b>	Outline Skills and Employment Plan
<b>OTN</b>	Offshore Transmission Network
<b>OWF</b>	Offshore Windfarm
<b>PA2008</b>	The Planning Act 2008
<b>PEMP</b>	Project Environment Management Plan
<b>PPV</b>	Peak Particle Velocity
<b>PRoW</b>	Public Rights of Way
<b>PVA</b>	Population Viability Analysis
<b>R</b>	Requirement
<b>RAF</b>	Royal Air Force
<b>RIAA</b>	Report to Inform Appropriate Assessment



<b>RR</b>	Relevant Representation
<b>RRH</b>	Remote Radar Head
<b>RSPB</b>	Royal Society for the Protection of Birds
<b>RVAA</b>	Residential Visual Amenity Assessment
<b>RYB</b>	Red, Yellow and Blue
<b>s</b>	Section of Parliamentary Legislation
<b>SAC</b>	Special Area of Conservation
<b>SEP</b>	Sheringham Shoal Offshore Wind Farm Extension Project
<b>SEL</b>	Scira Extension Limited
<b>SLVIA</b>	Seascape and Landscape Visual Impact Assessment
<b>SOCG</b>	Statement of Common Ground
<b>SoS</b>	Secretary of State
<b>SOW</b>	Sheringham Offshore Windfarm
<b>SNCB</b>	Statutory Nature Conservation Bodies
<b>SNDC</b>	South Norfolk District Council
<b>SPA</b>	Special Protection Area
<b>SPZ</b>	Source Protection Zone
<b>SSSI</b>	Site of Special Scientific Interest
<b>SWMP</b>	Site Waste Management Plan
<b>TA</b>	Transport Assessment





<b>TCPA1990</b>	Town and Country Planning Act 1990 (as amended)
<b>TP</b>	Temporary Possession
<b>TPO</b>	Tree Preservation Order
<b>TTSA</b>	Traffic and Transport Study Area
<b>USI</b>	Unaccompanied Site Inspection
<b>UXO</b>	Unexploded Ordnance
<b>WFD</b>	Water Framework Directive
<b>WMS</b>	Written Ministerial Statement
<b>WWI</b>	World War One
<b>WWII</b>	World War Two
<b>ZTV</b>	Zones of Theoretical Visibility

### Examination Library

References in these questions set out in square brackets (eg [APP-010]) are to documents catalogued in the [Examination Library](#). The Examination Library will be updated regularly as the Examination progresses.



### Index

- Q1.1. General and Cross-topic Questions..... 13**
  - Q1.1.1 Planning Policy..... 13
  - Q1.1.2 Planning Permissions ..... 13
  - Q1.1.3 Legislative Framework ..... 13
  - Q1.1.4 Miscellaneous ..... 14
- Q1.2. Alternatives and need ..... 15**
  - Q1.2.1 Selection of Landfall Site ..... 15
  - Q1.2.2 Selection of Substation Site..... 15
  - Q1.2.3 Viability of the grid connection and progress with other licences..... 17
  - Q1.2.4 The Need for this type of Energy Infrastructure, and specifically for the Proposed Development ..... 18
- Q1.3. Benthic ecology, Intertidal, Subtidal and Coastal effects..... 19**
  - Q1.3.1 Effects on Marine Life and Benthic Habitats including through Cable Installation Methods..... 19
  - Q1.3.2 Impact on subtidal chalk features..... 21
  - Q1.3.3 Coastal erosion effects and coastal processes ..... 21
  - Q1.3.4 Effects on the Marine Conservation Zone..... 21
- Q1.4. Civil and Military Aviation..... 24**
  - Q1.4.1 Effects on Radar and Defence Interests..... 24
  - Q1.4.2 Proposed Mitigation ..... 24
- Q1.5. Construction Effects Offshore..... 26**
  - Q1.5.1 Development Scenarios and Rochdale Envelope .... 26
- Q1.6. Construction Effects Onshore ..... 29**
  - Q1.6.1 Development Scenarios ..... 29
  - Q1.6.2 Approach to Construction, Compounds, Programme, Timing and Methods..... 30
  - Q1.6.3 Baseline survey and effects of Unexploded Ordnance..... 33

- Q1.6.4 Effects of construction works on human health ..... 34
- Q1.6.5 Effects from emissions on air quality ..... 36
- Q1.6.6 Adequacy of the Outline Code of Construction Practice ..... 38
- Q1.6.7 Waste Management..... 39
- Q1.7. Commercial Fisheries and Fishing ..... 40**
  - Q1.7.1 Effects on Fishing Stocks..... 40
  - Q1.7.2 Effects on fishing enterprises as a result of navigational or special restrictions ..... 40
- Q1.8. Compulsory Acquisition and Temporary Possession ..... 42**
  - Q1.8.1 Updates on Negotiations ..... 42
  - Q1.8.2 Affected Persons’ Site-specific Issues..... 42
  - Q1.8.3 Special Land..... 43
- Q1.9. Cumulative Effects ..... 45**
  - Q1.9.1 Scope and Extent..... 45
- Q1.10. Design..... 47**
  - Q1.10.1 Design Principles..... 47
  - Q1.10.2 Design Development Process ..... 47
- Q1.11. Draft Development Consent Order ..... 49**
  - Q1.11.1 General ..... 49
  - Q1.11.2 Definitions ..... 50
  - Q1.11.3 Schedules ..... 51
  - Q1.11.4 Schedules ..... 54
  - Q1.11.5 Requirements ..... 55
  - Q1.11.6 Draft Deemed Marine Licences..... 56
  - Q1.11.7 Interaction of the dDCO with Other Legislated DCOs, Other Existing Infrastructure and Planned Projects..... 57
- Q1.12. Habitats and Ecology Offshore ..... 58**
  - Q1.12.1 Effects on Ornithology ..... 58



Q1.12.2 Effects on Aquatic Wildlife including Mammals, Fish and Shellfish..... 59

**Q1.13. Habitats and Ecology Onshore..... 62**

Q1.13.1 Effects on European Designated Sites and Sites of Special Scientific Interest ..... 62

Q1.13.2 Effects on Protected and Priority Species..... 62

Q1.13.3 Effects on Ancient Woodland, Trees and Hedgerows ..... 63

Q1.13.4 Effects on Rivers and River-Based Wildlife ..... 64

**Q1.14. Habitats Regulation Assessment ..... 66**

Q1.14.1 Effect of the Proposed Development on its own and In-combination with Other Plans and Projects ..... 66

**Q1.15. Historic Environment and Cultural Heritage . 74**

**Offshore Matters ..... 74**

Q1.15.1 Adequacy of Baseline Surveys and Environmental Information ..... 74

**Onshore Matters ..... 74**

Q1.15.2 Adequacy of baseline surveys and information ... 74

Q1.15.3 Effects on Designated and Non-designated Heritage Assets ..... 75

**Q1.16. Land Use ..... 77**

Q1.16.1 Effect on Agricultural Land and Businesses and Recreational Assets ..... 77

Q1.16.2 Soils and Soil handling, Ground Conditions, Contamination and Minerals ..... 79

**Q1.17. Landscape and Visual Effects ..... 82**

Q1.17.1 Effect on Landscape Character and Views..... 82

Q1.17.2 Effects on designated and historic landscapes, including Areas of Outstanding Natural Beauty and Ancient Woodlands ..... 85

Q1.17.3 Effectiveness of mitigation proposals ..... 86

**Q1.18. Seascape and Visual Effects ..... 88**

Q1.18.1 Effect on Seascape Character and Views ..... 88

Q1.18.2 Effects During Construction ..... 88

Q1.18.3 Effects on Designated and Historic Landscapes .. 88

Q1.18.4 Cumulative Effects ..... 89

**Q1.19. Navigation and Shipping ..... 91**

Q1.19.1 Navigational Risk and Effect on Navigational Safety ..... 91

Q1.19.2 Impact on Radar, Search and Rescue ..... 93

**Q1.20. Noise and Vibration..... 94**

Q1.20.1 Adequacy of the Assessments for Construction .. 94

Q1.20.2 Construction Effects on Sensitive Receptors..... 95

Q1.20.3 Cumulative Effects Assessment..... 97

Q1.20.4 Adequacy and Design of Proposed Mitigation ..... 98

**Q1.21. Oil, Gas and Other offshore infrastructure and activities..... 99**

Q1.21.1 Safety measures ..... 99

Q1.21.2 Effectiveness of Proposed Mitigation ..... 99

**Q1.22. Socio-economics effects..... 100**

Q1.22.1 Effects on recreation, tourism and business.....100

Q1.22.2 Effects on jobs and skills.....102

Q1.22.3 Effects on Individuals and Communities .....103

Q1.22.4 Inter-related Effects on Human Health and Community Well-being .....105

**Q1.23. Traffic and Transport ..... 106**

Q1.23.1 Effects from Construction Vehicles on the Highway Network and Living Conditions.....106

Q1.23.2 Traffic Management Proposals and Impacts on the Highway Network .....107

Q1.23.3 Cumulative Traffic Effects with Other Local Projects.....108

Q1.23.4 Effects on Recreational Routes, such as Public Rights of Way.....109



Q1.23.5 Suitability of Access Strategy.....109

Q1.23.6 Effectiveness of Proposed Mitigation Measures 110

**Q1.24. Water quality and resources ..... 114**

Q1.24.1 Effects on Flood Risk and Drainage, including  
Adequacy of Sequential and Exception Tests .....114

Q1.24.2 Effects on Water Resources and Water Quality,  
including Measures to Prevent Pollution of Aquifers ....118

Q1.24.3 Effects on Rivers, Streams, Canals and Ditches  
from Proposed Construction Methods and Crossing ....121

Q1.24.4 Effectiveness of Mitigation Measures.....122

**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

<b>Q1.1. General and Cross-topic Questions</b>			<b>North Norfolk District Council Response</b>
<b>Q1.1.1 Planning Policy</b>			
Q1.1.1.1	Local Authorities	<p><b>Planning Policy</b></p> <p>Set out whether, in your view:</p> <p>a) There are any areas of where the Proposed Development conflicts with the aims and objectives of the designated NPSs, specifically NPS EN1 and NPS EN3;</p> <p>b) The representation of the Local Plans and policies [APP-088] is accurate or, if not, provide updated information;</p> <p>c) Any other policy documents are considered important and relevant to the Examination.</p> <p>d) Applicant, provide a complete summary in tabular form to demonstrate how it is considered the Proposed Development accords with all relevant paragraphs of the designated energy NPSs.</p>	<p><b>a) To be set out as part of Local Impact Report and Statement of Common Ground between Applicant and NNDC</b></p> <p><b>b) To be set out as part of Local Impact Report and Statement of Common Ground between Applicant and NNDC</b></p> <p><b>c) To be set out as part of Local Impact Report and Statement of Common Ground between Applicant and NNDC</b></p> <p><b>d) N/A</b></p>
<b>Q1.1.2 Planning Permissions</b>			
Q1.1.2.1	Applicant Local Authorities	<p><b>Planning Permissions</b></p> <p>Please update the Examination as to whether any new permissions have been granted, or new projects pending decision, that require consideration within the cumulative impact assessment.</p>	<b>None</b>

**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

			<b>North Norfolk District Council Response</b>
Q1.1.2.2	Applicant Local Authorities	<b>Planning Applications</b> Have any proposed works, to date, been subject to planning applications under s78 of the TCPA1990 (as amended) and, if so, where are they and what is their status?	<b>None at the time of Deadline 1 submission.</b>

**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

<b>Q1.1.4 Miscellaneous</b>		<b>North Norfolk District Council Response</b>	
Q1.1.4.1	Applicant Interest Parties	<p><b>Review of Energy NPSs</b></p> <p>In light of the ongoing review of the energy NPSs, would any aspect of the Proposed Development be in conflict with, or require revision to align with, the revised energy NPSs? The ExA notes that the Applicant's assessment [APP-285, Section 6] but invites any further comments from the Applicant.</p>	<b>No comment</b>
Q1.1.4.2	Local Authorities	<p><b>Availability of Resources for NSIP casework</b></p> <p>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?</p>	<p><b>Resource concerns were outlined at the Preliminary Meeting on 17 Jan 2023.</b></p> <p><b>Local Authority resources are already considerably stretched. Local Authorities receive no financial recompense for the officer time/cost involved in participating in NSIP examinations and this means that, in order to participate in the NSIP regime, existing resources are taken away from other LPA projects and statutory tasks.</b></p> <p><b>The ExA need to be aware that, given other work pressures, there is limited ability for LPA officers to spend significant time reading voluminous documents and supporting information that accompany NSIP projects. It is therefore important that LPA Officer time is managed appropriately given a wide variety of workload demands beyond the NSIP regime. This may mean that responses to written questions from the ExA to Local Authorities may have to be brief and to the point. For other NSIP projects, Local Authorities have worked towards securing a Planning Performance Agreement to recover some of the costs involved in discharging DCO Requirements. This is helpful but does not address the upfront costs associated with NSIP examination and this is often the stage where value can best be added to a DCO but where time and</b></p>

**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

			<b>available resources are limited.</b>
--	--	--	---



**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

<b>Q1.2.4 The Need for this type of Energy Infrastructure, and specifically for the Proposed Development</b>		<b>North Norfolk District Council Response</b>	
Q1.2.4.1	Applicant Interested Parties	<p><b>Need for Offshore Wind farm</b></p> <p>a) The assessment of need for the Proposed Development has been set within the context of the ongoing need for electricity generation in the U.K. [APP-285, Section 4]. However, there are other types of infrastructure that are supported by NPS EN-1 that can meet the need for electricity generation. Justify the need for the specific type of infrastructure (offshore windfarm) for electricity generation as opposed to or alongside other types of infrastructure. And explain, how the Proposed Development specifically satisfies the need for offshore windfarms for electricity generation. Explain in the context of NPS EN-1, including Paragraph 3.2.3: <i>"The weight which is attributed to considerations of need in any given case should be proportionate to the anticipated extent of a project's actual contribution to satisfying the need for a particular type of infrastructure"</i>; and Paragraph 3.3.4: <i>"There are benefits of having a diverse mix of all types of power generation. It means we are not dependent on any one type of generation or one source of fuel or power and so helps to ensure security of supply."</i></p>	<p><b>NNDC is fully supportive of offshore renewable energy as a way to secure clean renewable energy.</b></p> <p><b>The Applicant is better placed to justify their proposal but NNDC consider it would be entirely remiss for the ExA to conclude that offshore wind is not needed. It is needed, but the key question for the ExA is how the DCO can positively manage any adverse impacts and maximise the benefits in delivering renewable energy.</b></p> <p><b>NNDC consider the public benefits will most certainly outweigh the adverse impacts.</b></p>

**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

<b>Q1.3. Benthic ecology, Intertidal, Subtidal and Coastal effects</b>		
<b>Q1.3.1 Effects on Marine Life and Benthic Habitats including through Cable Installation Methods</b>		<b>North Norfolk District Council Response</b>
Q1.3.1.1	<p>Local Authorities Environment Agency Natural England Royal Society for the Protection of Birds Marine Management Organisation</p> <p><b>Intertidal and Subtidal areas</b> 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.</p>	<p><b>NNDC is fully supportive of the use of long HDD to bring cables onshore. This approach is much preferred to the impact of open trenching across Weybourne beach which would likely impact beach stability and also lead to extended footpath closures during construction / installation.</b></p>

**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

			<b>North Norfolk District Council Response</b>
Q1.6.5.4	Applicant Local Authorities	<p><b>Road Traffic Emissions Assessment Methodology</b></p> <p>When considering construction road vehicle exhaust emissions, the assessment [APP-132] sets out that <i>"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"</i>.</p> <p>a) LAs do you agree with this approach? b) Applicant, provide further justification for this approach.</p> <p>The ES [APP-132, Paragraph 157] notes that the statutory designated Railway Road and Gaywood Clock AQMAs in King's Lynn, declared in 2003 and 2009 respectively for exceedances of the NO2 annual mean, are located as close as 400m from road links likely to be used by project. It is assumed that due to this distance there will be no significant effects. Provide further justification and evidence to support this assertion.</p>	<p><b>a) No comment</b> <b>b) N/A</b></p>

**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

<b>Q1.6.6 Adequacy of the Outline Code of Construction Practice</b>		<b>North Norfolk District Council Response</b>
Q1.6.6.1	<p>Applicant Local Authorities National farmers Union</p> <p><b>Outline Code of Construction Practice</b> 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.</p> <p>a) 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? 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</p>	<p>a) N/A b) N/A c) N/A d) N/A e) N/A f) <b>NNDC will be guided by the ExA.</b></p>

**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

		reasons.	
--	--	----------	--

**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

			<b>North Norfolk District Council Response</b>
Q1.8.2.4	Applicant North Norfolk District Council Yvonne Odrowaz- Pieniazek	<p><b>Protected Characteristics</b></p> <p>a) Applicant, further to the ASI [EV-004], the ExA believes one or more residents of the Old Orchard House may have protected characteristics in line with s4 of the Equality Act 2010 [RR-124]. Explain what special consideration has been given.</p> <p>b) Applicant and NNDC, to confirm (without specifying any personal details) if protected characteristics of s4 of the Equality Act 2010 would trigger the Public Sector Equality Duty.</p> <p>c) Yvonne Odrowaz-Pieniazek, provide any further information or evidence that you may have to demonstrate that the exposure to EMF may be greater than the calculations provided by the Applicant.</p>	<p><b>a) N/A</b></p> <p><b>b) This is a matter for the ExA to consider as determining authority.</b></p> <p><b>c) N/A</b></p>

**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

<b>Q1.10. Design</b>			
<b>Q1.10.1 Design Principles</b>			<b>North Norfolk District Council Response</b>
Q1.10.1.1	Applicant Local Authorities Statutory Bodies Interested Parties	<p><b>Suitability and Adequacy of the Applicant's Approach to Design</b></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 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>	<p>a) N/A</p> <p>b) No comment</p> <p>c) <b>See comments in SoCG on noise mitigation.</b></p>
<b>Q1.10.2 Design Development Process</b>			
Q1.10.2.1	Applicant Local Authorities Statutory Bodies Interested Parties	<p><b>Design Development Process</b></p> <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</p>	<p>a) N/A</p> <p>b) N/A</p> <p>c) N/A</p> <p>d) <b>This is a matter for the Applicant to explain.</b></p>

**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

		<p>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>	
--	--	---	--



**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

			<b>North Norfolk District Council Response</b>
Q1.10.2.2	Applicant Local Authorities Statutory Bodies Interested Parties	<b>Design Review</b> Comment, with reasons, if the Applicant should seek independent design review advice in line with the policy recommendation in NPS, Paragraph 4.5.5.	<b>This is a matter for the ExA to determine.</b>

**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

Q1.11. Draft Development Consent Order			
Q1.11.1 General			North Norfolk District Council Response
<p>The questions here relate to the dDCO Revision B [AS-009] and EM Revision B [AS-012]. All other documents referenced in the following questions have been identified with EL references.</p>			
Q1.11.1.3	Applicant Discharging Authorities	<p><b>Discharging Requirements and Conditions</b></p> <p>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.</p> <ul style="list-style-type: none"> <li>• highway authority</li> <li>• lead local flood authority</li> <li>• relevant planning authority</li> <li>• local planning authority</li> <li>• street authority</li> <li>• drainage authority</li> <li>• sewerage undertaker</li> <li>• local authority</li> <li>• acquiring authority</li> <li>• public authority</li> <li>• Crown authority</li> <li>• approving authority</li> </ul>	N/A

**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

Q1.11.2 Definitions		North Norfolk District Council Response
Q1.11.2.2	<p>Applicant Local Authorities Interested Parties</p> <p><b>Commence</b></p> <p>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?</p> <p>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?</p> <p>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> <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,</p>	<p><b>a) In theory the activities shouldn't need or require to be controlled, monitored or mitigated because they should fall outside of the definition of development. However, to overcome the concern it may be as straightforward as amending the wording of Requirement 19 to say '19 - (1) No phase of the onshore works (including any associated activities or operations excluded from the definition of "commence") may commence or take place until a code of construction practice (which must accord.....'</b></p> <p><b>b) No</b></p> <p><b>c) No</b></p> <p><b>d) This is, in effect, covered in the definition of "commence" via the exclusions.</b></p> <p><b>e) No, but see answer to a) as a possible remedy.</b></p>

**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

		<p>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>	
Q1.11.2.3	Applicant Interested Parties	<p><b>Maintain</b> Justify if the drafting "<i>to the extent assessed in the environmental statement</i>" is an adequate bar in the definition of maintain to limit maintenance activities authorised under the dDCO and the dDMLs to those that are assessed within the ES.</p>	<p><b>There appears to be an inherent contradiction between how the definition of 'maintain' is applied to details approved as part of Requirement discharges.</b></p>

**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

<b>Q1.11.4 Schedules</b>			<b>North Norfolk District Council Response</b>
Q1.11.4.2	Discharging Authorities	<p><b>Further Associated Development</b></p> <p>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 Nos. 8C, 9C, 12C, 15C, 16C and 17C are controlled adequately by the provisions in the dDCO?</p>	<p><b>NNDC assess these 'further associated works' as a catch-all for associated activities that fall within the scope of the rochdale envelope akin to ancillary related development.</b></p> <p><b>There are clear benefits to allowing some flexibility within the project without requiring the need for additional consents, provided the impact of such work has been assessed within the environmental statement.</b></p> <p><b>The alternative would be to rigidly control the project and this could require additional consents and add unnecessary bureaucratic burdens which may not be in the wider public interest.</b></p>
Q1.11.4.3	Discharging Authorities	<p><b>Ancillary Works</b></p> <p>Are you satisfied that all instances of ancillary works are controlled adequately by the provisions in the dDCO?</p>	<p><b>Yes – see above</b></p>
Q1.11.4.5	Discharging Authorities	<p><b>Accuracy of all Schedules</b></p> <p>Check the Schedules in the dDCO for accuracy and provide the ExA with suggested corrections and amendments.</p>	<p><b>See response to Q1.11.2.2 a) for suggested amends to Requirement 19. Aspects of this wording might be applicable to other Requirements where submission and approval of final documents may be necessary before any aspect of work begins.</b></p> <p><b>NNDC reserves the right to suggest further amendments to the dDCO during the course of the examination process.</b></p>

**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

<b>Q1.13. Habitats and Ecology Onshore</b>			
<b>Q1.13.1 Effects on European Designated Sites and Sites of Special Scientific Interest</b>			<b>North Norfolk District Council Response</b>
Q1.13.1.1	Local Authorities Environment Agency Natural England	<p><b>Air Quality and Screening of Ecological Sites</b></p> <p>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)].</p>	<b>See Statement of Common Ground submitted at Deadline 2.</b>
<b>Q1.13.2 Effects on Protected and Priority Species</b>			
Q1.13.2.4	Applicant Royal Society for the Protection of Birds	<p><b>Weybourne Cliffs</b></p> <p>It is identified that populations of sand martins nest within the cliffs [APP-106]. Would noise and vibration from the landfall construction operations, with particular regard to vibrations from the HDD, have any effect upon the integrity of the cliffs or the living conditions of the sand martins such that nesting could be abandoned?</p>	<b>On reflection, NNDC consider this to be a matter for Applicant and RSPB to respond.</b>

**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

<b>Q1.16.2 Soils and Soil handling, Ground Conditions, Contamination and Minerals</b>		<b>North Norfolk District Council Response</b>
Q1.16.2.5	<p>Applicant Environment Agency Local Authorities</p> <p><b>Contaminated Land – Approach</b></p> <p>The ES [APP-103] notes that potential areas of contamination cannot be avoided. This includes areas such as the disused airfield at Brandiston, railways lines (both historical and active) former pits and historic tanks. The assessment also identifies that targeted ground investigations may be required.</p> <p>a) What options were considered in the optioneering stage to avoid areas of potential contamination (i.e. why did the onshore cable corridor have to go through Brandiston Airfield)? This was not specifically mentioned in ES Chapter 3.</p> <p>b) Are the Order limits and cable corridor widths such that any dense areas of contamination within these areas could be bypassed, by micro-siting the cables away from them (i.e. if there is an aeroplane fuel leak contained in one part of the cable corridor that could be diverted around)?</p> <p>c) Are the EA and LAs content that targeted ground investigations have not yet been undertaken and would be subject to post-consent processes?</p>	<p><b>See Statement of Common Ground submitted at Deadline 2.</b></p>

**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

<b>Q1.17. Landscape and Visual Effects</b>			
<b>Q1.17.1 Effect on Landscape Character and Views</b>			<b>North Norfolk District Council Response</b>
Q1.17.1.1	Local Authorities	<p><b>LVIA Methodology</b></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>	<b>See Statement of Common Ground submitted at Deadline 2.</b>



**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

Q1.17.1.9	Local Authorities The Applicant	<p><b>Residential Receptors</b></p> <p>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>d) 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>	<p><b>See Statement of Common Ground submitted at Deadline 2.</b></p>
Q1.17.1.13	Interested Parties	<p><b>The Applicant’s Assessment of Effects within its LVIA Documents</b></p> <p>Please set out, or provide signposting to where you have set out, any areas of disagreement with the Applicant’s baselines, methodologies and assessment of effectiveness of proposed mitigation measures within its Landscape and Visual Impact Assessment [APP-112]. If no areas of disagreement exist, please indicate this with reasons explaining why you believe the application documents provide satisfactory information on this topic.</p>	<p><b>See Statement of Common Ground submitted at Deadline 2.</b></p>

**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

<b>Q1.17.3 Effectiveness of mitigation proposals</b>			<b>North Norfolk District Council Response</b>
Q1.17.3.4	Local Authorities	<p><b>Extent of Mitigation</b></p> <p>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?</p>	<b>See Statement of Common Ground submitted at Deadline 2.</b>
Q1.17.3.6	Local Authorities Interested Parties	<p><b>Outline Landscape Management Plan</b></p> <p>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]?</p>	<b>See Statement of Common Ground submitted at Deadline 2.</b>

**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

<b>Q1.18. Seascape and Visual Effects</b>			
<b>Q1.18.1 Effect on Seascape Character and Views</b>			<b>North Norfolk District Council Response</b>
Q1.18.1.1	Local Authorities	<p><b>SLVIA Methodology</b> 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).</p>	<p><b>See Statement of Common Ground submitted at Deadline 2.</b></p>
<b>Q1.18.3 Effects on Designated and Historic Landscapes</b>			
Q1.18.3.1	The Applicant Local Authorities, Interested Parties	<p><b>The Existing Baseline and its Effect on the Statutory Purpose of the NCAONB</b> NE states that the existing OWF installations have a compromising effect on the statutory purpose of the NCAONB [RR-063]. Respond, with reasoning.</p>	<p><b>NNDC acknowledge that the existing OWF installations have impacted the long range sea views from within the AONB, both by day and by night, and that the baseline seascape has altered, but do not consider that this has had a significant impact on the statutory purpose of the AONB. The designated AONB landscape extends to mean low water and, while the links between land and sea are an essential part of its unique character and recognised within the Statement of Significance, it is the intertidal habitats, the variety and inter-relationship of the dynamic coastal features such as saltmarsh, soft cliff, dunes and shingle and the agricultural hinterland that make this landscape so rich. Human influence is also an integral part of the landscape through the archaeology, built heritage, agricultural practices, field patterns and coastal defence and the OWF installations can be viewed as a contemporary human intervention as a means to address</b></p>

**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

			<b>climate change and geo-political forces.</b>
Q1.18.3.2	Local Authorities,	<p><b>The Extent of Additional Harm to the NCAONB</b></p> <p>What is your assessment of the effects of the Proposed Development on the NCAONB in EIA terms?</p>	<b>NNDC consider that the proposed development will add similar elements to the existing baseline seascape, and due to the increased scale of the structures, the extended array will be more apparent in views from onshore. However, it is not considered that this will significantly alter the ability to experience the natural and scenic beauty of the designated AONB.</b>
Q1.18.3.3	The Applicant Local Authorities, Interested Parties	<p><b>Cumulative Impact Assessment</b></p> <p>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?</p>	<b>NNDC consider that it is important to assess the cumulative effect on the seascape of the addition of the SEP and DEP to the existing OWF installation baseline</b>
Q1.18.3.5	Local Authorities	<p><b>Tourism and Coastal Footpaths</b></p> <p>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?</p>	<p><b>Given that significant construction activities for consented offshore wind NSIP schemes have yet to begin (including for Ørsted Hornsea Project Three or Vattenfall Vanguard or Boreas) there is no hard evidence available in relation to the construction impacts associated with bringing cables onshore and laying cables along a cable corridor.</b></p> <p><b>The original Sheringham Shoal and Dudgeon schemes were permitted under a different planning regime. There is no hard evidence available which states that existing windfarms visible from land have had a negative impact on tourism. Gathering such evidence is extremely challenging other than examining the number of repeat bookings. Clearly those looking for 'unspoilt' seascape views may be disappointed given the number of turbines visible along large stretches of coastline along the North Norfolk coast. Others may find the turbines of visual interest. It is very much dependent on the individual.</b></p>

**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

Q1.18.3.6	Historic England Norfolk County Council North Norfolk District Council	<p><b>North Norfolk Heritage Coast</b></p> <p>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.</p>	<p><b>This non-statutory designation and the defined purposes is encompassed within the remit of the Norfolk Coast AONB and its strategic objectives. The type and extent of lighting should be limited to minimise nocturnal impact on the undeveloped coast.</b></p>
Q1.18.3.7	Historic England Norfolk County Council North Norfolk District Council	<p><b>Aviation Lighting</b></p> <p>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?</p>	<p><b>NNDC recognise that aviation lighting is required to ensure turbine visibility at night for the benefit of aircraft safety. If opportunities exist to keep the number of lights to the minimum necessary to achieve safe then they should be explored. The Ministry of Defence may be best placed to guide such discussions.</b></p>

**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

<b>Q1.18.4 Cumulative Effects</b>			<b>North Norfolk District Council Response</b>
Q1.18.4.1	Local Authorities Interested Parties	<p><b>Cumulative Effects</b></p> <p>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.</p>	<p><b>Yes, NNDC is satisfied with the list of projects included in the assessment of cumulative landscape and visual effects (as shown in Fig 5.1 Offshore Projects taken into account in the CIA, Chapter 5 of the EIA)</b></p>

**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

<b>Q1.20. Noise and Vibration</b>			
<b>Q1.20.1 Adequacy of the Assessments for Construction</b>			<b>North Norfolk District Council Response</b>
Q1.20.1.1	Applicant Local Authorities	<p><b>Methodology – Baseline Noise Survey</b></p> <p>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?</p>	<p><b>The applicant’s acknowledgement that baseline data is unexpectedly high at LFR1 and LFR2 is noted/accepted. It is suggested that using the lowest threshold (for the BS 5228:2009+A1:2014 ‘ABC method’) at identified NSRs for the assessment of construction noise’ is an accepted noise target.</b></p>
Q1.20.1.2	Applicant Local Authorities	<p><b>Methodology - Baseline Noise Assumptions</b></p> <p>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]?</p> <p>b) Further, explain why no surveys were undertaken in proximity to the main construction compound at Attlebridge.</p> <p>c) Is it possible that actual baseline levels at the sensitive receptors could be lower than assumed?</p> <p>d) If so, what impact would this have on the assessment?</p>	<p><b>a) Achieving the Category A target noise levels from BS5228 at receptors would achieve a standardised noise target residents for the duration of construction site noise.</b></p> <p><b>b) This site is outside NNDC area.</b></p> <p><b>c) Actual baseline noise levels may be low especially for rural areas.</b></p> <p><b>d) Receptors in areas of low background noise may experience a greater increase in noise levels in terms of decibel increase than sites with higher background noise, during construction. However, BS5228 suggests achieving a standardised target noise level at dwellings for each of the day, evening and night-time periods.</b></p>
Q1.20.1.4	Local Authorities	<p><b>Methodologies – Noise and Vibration</b></p> <p>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</p>	<p><b>These are matters currently being resolved through the SoCG. Response to be provided by Deadline 2</b></p> <p><b>The following 3 documents have been reviewed:</b></p> <ul style="list-style-type: none"> <li><b>• Construction Phase Noise Assessment</b></li> <li><b>• Vibration Assessment</b></li> <li><b>• Road Traffic Noise Assessment</b></li> </ul>

**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

		levels?	<p><b>General Methodology and suggested mitigation are acceptable and the impact of noise, road traffic noise and vibration have been assessed and receptors requiring further mitigation have been identified. Impacts during the construction phase are short term and potential suitable mitigation measures are highlighted.</b></p> <p><b>As in ID15 of the North Norfolk District Council Statement of Common Ground identifies the future mechanisms for discussion and agreement on mitigation measures.</b></p> <p><b>The CNMP, the OCoCP Revision B) and the Outline Construction Traffic Management Plan (document reference 9.16, APP) includes all relevant mitigation measures specified in ES Chapter 23 Noise and Vibration (document reference 6.1.23, APP-109) and is appropriate for managing construction and post construction impacts from the Project on Noise and Vibration receptors. The Code of Construction Practice is secured under Requirement 19 (within Schedule 2, Part 1) of the draft DCO.</b></p>
--	--	---------	--



**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

<b>Q1.20.4 Adequacy and Design of Proposed Mitigation</b>			<b>North Norfolk District Council Response</b>
Q1.20.4.3	Applicant Local Authorities	<b>Potential Impacts</b> – 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.	<b>NNDC have no comments to make here.</b>

Q1.22. Socio-economics effects			
Q1.22.1 Effects on recreation, tourism and business			North Norfolk District Council Response
Q1.22.1.4	Norfolk County Council Norfolk District Council	<p><b>Tourist Income</b></p> <p>In respect of the tourism assets on offer:</p> <p>a) Explain the main forms of tourism within Norfolk and, if possible, specifically in the areas where the Proposed Development would be located.</p> <p>b) Explain the revenue that is derived from tourists visiting Weybourne Beach.</p> <p>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.</p>	<p><b>a) There are many forms of tourism in Norfolk. The ExA are advised to view the Visit North Norfolk website to see the full extent of tourism offer within North Norfolk. <a href="http://www.visitnorthnorfolk.com">Welcome to North Norfolk - North Norfolk (visitnorthnorfolk.com)</a> It would be near impossible to provide this as a static document. Many visitors are day visitors from across the region (and beyond including the midlands) drawn to the many coastal towns and beaches for the sea air, walks (including those with dogs) and food including popular fish and chips. Others are drawn to the area for its wildlife, landscapes, seascapes and generally unspoilt character and historic buildings and architecture. At Weybourne, the beach is a shingle beach but still proves very popular for walking (including those with dogs), sea fishing and other recreation. The Norfolk Coast path passes over the Proposed Development. Inland, the Proposed Development criss-crosses many rural roads popular with walkers and cyclists enjoying the landscape wildlife and historic buildings.</b></p> <p><b>b) NNDC operates a circa 300 space car park on Beach Road, Weybourne. The car park is situated adjacent to the beach and has a rough hard-standing finish. The car park is situated away from the village of Weybourne. The pattern of usage is in line with school holidays with peak usage in August with typically 1/5th of the peak number during the quieter (and colder) winter months. Car park income can vary from circa £11k to £17k per annum. Parking charges apply from 8am to 6pm and vary based on the type of tariff. Typical Coastal parking rate: 8am to 6pm - £1.80 per hour There are currently no electric vehicle charging points. Public toilets with disabled facilities are now available. Winter opening times:</b></p>

**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

			<p><b>November to mid-March - open daily from 9am to 5pm. Summer opening times: mid-March to October - open daily from 9am to 8pm.</b></p> <p><b>c) See Local Impact Report submitted at Deadline 1. If construction activities block, impinge or otherwise detract from a positive visitor experience then affected visitors may decide not to return or re-visit which construction activities are taking place. NNDC accepts that it is challenging to present hard evidence of such impacts occurring. It is most likely that the extent of any such impacts will only be realised at the point that construction activities take place. This re-emphasises the importance of ensuring that construction activities are properly managed to reduce any adverse impacts as much as reasonably possible.</b></p>
Q1.22.2.8	Applicant Local Authorities	<p><b>Outline Skills and Employment Plan</b></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>	<p><b>The OSEP seems broadly acceptable as currently drafted. NNDC would assess the Local Skills and Employment Plan under proposed draft DCO Requirement 26 for its area. The biggest beneficiaries are likely to be businesses and employers within LPAs not identified as the relevant planning authority within the NSIP. For example, the main port is expected to be within GYBC area and this is where the biggest economic benefits will be derived linked to port activities. There may be some benefit from amendment to Requirement 26 to involve Norfolk County Council, who have lead on the approval of similar Requirements for Vattenfall Vanguard and Boreas and for Ørsted Hornsea Project Three. Having the higher tier authority oversight of the OSEM may help bring together a consistency of approach across Norfolk and enable those authorities not likely to be discharging authorities under draft DCO Requirement 26 to have a voice in shaping the plan and delivering the maximum public benefits.</b></p>

**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

Q1.22.3 Effects on Individuals and Communities			North Norfolk District Council Response
Q1.22.3.2	Local Authorities	<p><b>Development Consent Obligations</b></p> <p>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><b>NNDC actually said within RR-069 that 'NNDC recognises that, once built, the scheme is likely to be relatively benign. However, the authority believes that it is important that the proposals sufficiently address any harmful impacts associated with construction including potential damage to coastal areas, loss of trees and hedgerows along and associated with the cable corridor, damage to roads and verges from traffic together with consideration of harm to the economic prosperity of businesses affected by any extended or multi-phased construction activities. The Council believes it will therefore be important for the examination panel to carefully consider and understand the package of CIL compliant benefits being put forward by Equinor New Energy Limited as part of the consent process and how those benefits would be secured. Outside of the DCO process, North Norfolk District Council will seek to negotiate with Equinor New Energy Limited to secure a range of benefits for the wider community of North Norfolk'.</b></p> <p><b>NNDC is acutely aware from past NSIP examinations that, in the absence of available hard evidence quantifying potential harm to the economic prosperity of businesses affected by construction activities, it may be challenging to secure CIL compliant obligations to address the potential impacts. This <u>does not</u> mean that harm will not occur but that such harm is difficult to quantify in a way that enables provisions to be secured within a legal obligation that are CIL compliant.</b></p>

**Provisional deadline for responses is Deadline 1: Monday 20 February 2023**

Q1.24.2.17	Applicant Interested Parties	<b>Private Water Supplies</b> Is it justified to address impacts on private water supplies post-consent? If so and further, how is this secured in the dDCO?	<b>No Comment</b>
------------	------------------------------	---	-------------------