



Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects

Draft Statement of Common Ground:
Norfolk County Council (Revision B)

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Glossary of Acronyms

CIA	Cumulative Impact Assessment
DCO	Development Consent Order
DEP	Dudgeon Offshore Wind Farm Extension Project
EIA	Environmental Impact Assessment
EPP	Evidence Plan Process
ES	Environmental Statement
ETG	Expert Topic Group
GI	Ground Investigation
HSC	Historic Seascape Characterisation
IDB	Internal Drainage Board
km	Kilometre
LLFA	Lead Local Flood Authority
NCC	Norfolk County Council
NPPF	National Planning Policy Framework
NSIP	Nationally Significant Infrastructure Project
OCTMP	Outline Construction Traffic Management Plan
ODP	Outline Operational Drainage Plan
PEIR	Preliminary Environmental Information Report
PRA	Preliminary Risk Assessment
SEP	Sheringham Offshore Wind Farm Extension Project
SoCG	Statement of Common Ground
UK	United Kingdom
WFD	Water Framework Directive
WSI	Written Scheme of Investigation

Glossary of Terms

Order Limits	The area subject to the application for development consent, including all permanent and temporary works for SEP and DEP.
Dudgeon Offshore Wind Farm Extension Project (DEP)	The Dudgeon Offshore Wind Farm Extension onshore and offshore sites including all onshore and offshore infrastructure.
DEP onshore site	The Dudgeon Offshore Wind Farm Extension onshore area consisting of the DEP onshore substation site, onshore cable corridor, construction compounds, temporary working areas and onshore landfall area.
European site	Sites designated for nature conservation under the Habitats Directive and Birds Directive. This includes candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation and Special Protection Areas, and is defined in regulation 8 of the Conservation of Habitats and Species Regulations 2017.
Evidence Plan Process (EPP)	A voluntary consultation process with specialist stakeholders to agree the approach, and information to support, the EIA and HRA for certain topics.
Expert Topic Group (ETG)	A forum for targeted engagement with regulators and interested stakeholders through the EPP.
Horizontal directional drilling (HDD) zones	The areas within the onshore cable route which would house HDD entry or exit points.
Landfall	The point at the coastline at which the offshore export cables are brought onshore, connecting to the onshore cables at the transition joint bay above mean high water
Onshore cable corridor	The area between the landfall and the onshore substation sites, within which the onshore cable circuits will be installed along with other temporary works for construction.
Onshore export cables	The cables which would bring electricity from the landfall to the onshore substation. 220 – 230kV.

Onshore Substation	Compound containing electrical equipment to enable connection to the National Grid.
PEIR boundary	The area subject to survey and preliminary impact assessment to inform the PEIR.
Sheringham Shoal Offshore Wind Farm Extension Project (SEP)	The Sheringham Shoal Offshore Wind Farm Extension onshore and offshore sites including all onshore and offshore infrastructure.
SEP onshore site	The Sheringham Shoal Wind Farm Extension onshore area consisting of the SEP onshore substation site, onshore cable corridor, construction compounds, temporary working areas and onshore landfall area.
Study area	Area where potential impacts from the project could occur, as defined for each individual Environmental Impact Assessment (EIA) topic.
The Applicant	Equinor New Energy Limited. As the owners of SEP and DEP, Scira Extension Limited and Dudgeon Extension Limited are the named undertakers that have the benefit of the DCO. References in this document to obligations on, or commitments by, 'the Applicant' are given on behalf of SEL and DEL as the undertakers of SEP and DEP.

1 Introduction

1.1 Background

1. This draft Statement of Common Ground (SoCG) has been prepared by Equinor New Energy Limited (the Applicant) and Norfolk County Council (NCC). It identifies areas of the Sheringham Shoal Offshore Wind Farm Extension Project (SEP) and Dudgeon Offshore Wind Farm Extension Project (DEP) Development Consent Order (DCO) application (the Application) where matters are agreed, not agreed or that remain under discussion between the parties.
2. The Applicant has had regard to the Planning Act 2008: Guidance for the examination of applications for development consent (Department for Communities and Local Government, 2015) when compiling this draft SoCG.
3. This draft SoCG has been structured to reflect topics of the Application which are of interest to NCC. The applicable matters considered within this draft SoCG apply to NCC’s statutory and non-statutory remit.
4. **Table 1** presents the topics included in the draft SoCG with the Applicant and NCC.

Table 1: Topics Included in the Draft SoCG

Topic/Chapter	DCO Document Reference	Evidence Plan Process (EPP) (Yes/No)
Water Resources and Flood Risk	APP-104	Yes
Onshore Archaeology and Cultural Heritage	APP-107	Yes
Traffic and Transport	APP-110	Yes
Socioeconomics and Tourism	APP-113	No

5. Further detail of those topics included in the Evidence Plan Process (EPP) can be found in the **Consultation Report Appendix 1 (Evidence Plan)** (APP-030). Details of the consultation undertaken on those topics not included in the EPP are set out in the corresponding chapters of the Environmental Statement (ES).
6. Topic specific matters agreed, not agreed, and matters that remain under discussion between the Applicant and NCC are included within this draft SoCG. Matters that are not yet agreed will be the subject of ongoing discussion between the Applicant and NCC to reach agreement on each matter wherever possible or refine the extent of disagreement between parties.
7. Throughout the draft SoCG the phrase “Agreed” identifies any point of agreement between the Applicant and NCC. The phrase “Not Agreed” identifies any point that is not agreed between the Applicant and NCC.

1.2 Consultation with NCC

8. The Applicant has engaged with NCC on the project during the pre-Application process, both in terms of informal non-statutory engagement and formal consultation carried out pursuant to Section 42 of the Planning Act 2008.

9. During formal (Section 42) consultation, NCC provided comments on the Preliminary Environmental Information Report (PEIR) by way of a letter dated 8th June 2021.
10. Further to the statutory Section 42 consultation, several meetings were held with NCC through the EPP. These are detailed throughout the SoCG, and minutes of the meetings are provided in **Consultation Report Appendix 1** (APP-030).

1.3 Summary of Agreed, Not Agreed and In Discussion

11. In order to easily identify whether a matter is 'agreed', 'not agreed', or 'in discussion' the position status colour coding system set out in **Table 2** is used in the SoCG.
12. Details of specific topics that are 'agreed', 'not agreed' or 'in discussion' between the Applicant and NCC are presented in **Table 5, Table 7, Table 9, Table 11**.

Table 2: Position status key

Position Status	Position Colour Coding
Agreed The matter is considered to be agreed between the parties	Agreed
Not Agreed – no material impact The Matter is not agreed between the parties however the outcome of the approach taken by either the Applicant or Natural England is not considered to result in a material impact to the assessment conclusions and the matter is considered to be closed for the purposes of this SoCG. Discussions on these matters have concluded.	Not Agreed – no material impact
Not Agreed – material impact The matter is not agreed between the parties and the outcome of the approach taken by either the Applicant or NCC is considered to result in a materially different impact to the assessment conclusions. Discussions on these matters have concluded.	Not Agreed – material impact
In discussion The matter is neither 'agreed' nor 'not agreed' and is a matter where further discussion is required between the parties (e.g. where documents are yet to be shared with NCC)	In discussion

2 Statement of Common Ground

13. A summary of the consultation undertaken to date with NCC and the matters agreed or not agreed between the Applicant and NCC (based on discussions and information exchanged between the Applicant and NCC during the pre-application phase of the Application) are set out below for each of the draft SoCG topic areas.

2.1 Project-wide considerations

14. **Table 3** provides areas of agreement and disagreement for project-wide considerations.

Table 3: Project-wide considerations

ID	The Applicants position	NCC position	Position Summary
Electricity Supply			
1	There is a need to provide new forms of renewable energy generation and this is emphasised in UK Government policy including the National Policy Statement for Renewable Energy Infrastructure (EN-3) The principle of the development of SEP and DEP is therefore supported, as it accords with national renewable energy policy, targets and objectives.		<i>Agreed / Not Agreed – no material impact Not Agreed – material impact In Discussion</i>
2	The onshore connection point was determined through a statutorily mandated process involving both the Applicant and National Grid, to identify a direct connection to the 400kV national transmission system.		<i>Agreed / Not Agreed – no material impact Not Agreed – material impact In Discussion</i>
Site Selection			
3	As described in ES Chapter 3 Site Selection and Assessment of Alternatives [APP-116], the methodology adopted for selecting and assessing the landfall location, is considered robust and appropriate.		<i>Agreed / Not Agreed – no material impact Not Agreed – material impact In Discussion</i>
4	As set out in the Onshore Substation Site Selection Report [APP-175], the methodology adopted for selecting and assessing the onshore substation location options, including the final option, is considered robust and appropriate.		<i>Agreed / Not Agreed – no material impact Not Agreed – material impact In Discussion</i>
5	As set out in the Onshore Main Construction Compound Site Selection Report [APP-177], the methodology adopted for selecting and assessing the main compound location options, including the final option, is considered robust and appropriate.		<i>Agreed / Not Agreed – no material impact Not Agreed – material impact In Discussion</i>
6	As described in ES Chapter 3 Site Selection and Assessment of Alternatives [APP-116],		<i>Agreed /</i>

ID	The Applicants position	NCC position	Position Summary
	the methodology adopted for selecting and assessing the cable corridor, including the final option, is considered robust and appropriate.		<i>Not Agreed – no material impact</i> <i>Not Agreed – material impact</i> <i>In Discussion</i>
Good Design			
7	The Applicant demonstrates in the DCO application how the project has been guided by a clear Project Vision [APP-313], overarching design principles /objectives and will deliver a project that reflects Good Design, in accordance with good practice (including safety).		<i>Agreed /</i> <i>Not Agreed – no material impact</i> <i>Not Agreed – material impact</i> <i>In Discussion</i>

2.2 Water Resources and Flood Risk

Table 4: Summary of Consultation with NCC Regarding water resources and flood risk

Date	Contact Type	Topic
Pre-Application		
19/05/2020	ETG Meeting 1	The following topics were discussed during the ETG meeting 1: <ul style="list-style-type: none"> The site selection at landfall, onshore substation, and cable corridor. The approach to the environmental baseline (study areas and data sources) and assessment methodologies.
03/06/2021	Section 42 Consultation	Norfolk County Council response to Section 42 consultation on the PEIR. Appendix 4 of the Consultation Report (APP-033)
11/11/2021	ETG Meeting 2 (including 2 supplementary meetings on 6 th and 30 th September) (minutes circulated to NCC)	The following topics were discussed during the ETG meeting 2: <ul style="list-style-type: none"> Project updates. Flood risk at the onshore substation (OnSS). Review and discussion of the Section 42 comments.
10/02/2022	ETG Meeting 3	The following topics were discussed during the ETG meeting 3: <ul style="list-style-type: none"> Surface water flood risk at the OnSS. The approach to site selection of the preferred OnSS site. The requirements of the updated National Planning Policy Framework (NPPF) (July 2021) to account for all sources of flooding, and how this has been considered in the project. Comparisons of baseline modelling to the Environment Agency surface water modelling data. The approach to SuDS drainage hierarchy. Flood risk and drainage requirements.
07/04/2022 (AM)	ETG Meeting 4	The following topics were discussed during the ETG meeting 4: <ul style="list-style-type: none"> The approach to OnSS layout refinement in relation to surface water flood risk. Further discussions around the feasibility of drainage options and SuDS drainage hierarchy.
07/04/2022 (PM)	ETG Meeting 4	The following topics were discussed during the ETG meeting 4:

Date	Contact Type	Topic
		<ul style="list-style-type: none"> • Further discussions around the OnSS layout refinement process. • Results of Geophysical Surveys and infiltration test at the OnSS. • Potential for deep infiltrations systems.
24/06/2022 25/06/2022	ETG Meeting 5	<p>The following topics were discussed during the ETG meeting 5:</p> <ul style="list-style-type: none"> • Hydraulic modelling at the OnSS. • Supplementary results of Geophysical Surveys. • Review of wider stakeholder engagement. • Review of agreement log.
Post-Application		
23/11/2022	ETG Meeting 6 ¹	<p>The following topics were discussed during the ETG meeting 6:</p> <ul style="list-style-type: none"> • Initial response on key flood risk and drainage matters including an overview of the contents of the Relevant Representation. • Update on the ongoing ground investigations at the OnSS and indicative results. • Update on progress with OnSS drainage solutions and discussion on additional information requirements, • Consideration of Protective Provisions vs. standard permitting process
06/12/2022	Meeting ²	<p>The following topics were discussed during the ETG meeting:</p> <ul style="list-style-type: none"> • Relevant representation. • Drainage options and confirmation of shallow infiltration. • Draft SoCG.
13/12/2022	Letter	Review of the draft SoCG.

¹ Meeting only attended by NCC.

² Meeting only attended by NCC.

Table 5: Topics agreed, in discussion or not agreed in relation to water resources and flood risk

ID	The Applicant Position	NCC Position ³	Position Summary
EIA – Policy and Planning			
1.	All relevant plans and policies have been identified in Section 18.4 of ES Chapter 18 Water Resources and Flood Risk [APP-104] and these have been appropriately considered in the assessment.	The project is not currently in a position to enable proper review of the relevant sections of the Environmental Statement at this time as there is not a determined surface water management scheme available to support the design for all the areas of the site. Therefore, the uncompleted sections in this current version of the SoCG response is appropriate at this time.	<i>In Discussion</i>
EIA – Baseline Environment			
2.	The ES adequately characterises the baseline environment in terms of water resources and flood risk as detailed in Section 18.5 of ES Chapter 18 Water Resources and Flood Risk [APP-104].	<p>The Applicant confirmed that the WFD water body boundaries will be used to delineate receptors. The desk-based assessment and results of the walkover surveys will be used to identify value and sensitivity for each receptor. Biological characteristics (e.g. designations and the presence of priority species) will be also taken into account when assigning sensitivity and value of receptors.</p> <p>This approach was discussed and agreed during ETG meeting 1, 19/05/2020, with the Internal Drainage Board and the Environment Agency.</p> <p>The LLFA have reviewed the notes from the meeting and would point out that the LLFA were not in attendance to this meeting on 19/5/2020.</p>	<p><i>Agreed /</i> <i>Not Agreed – no material impact</i> <i>Not Agreed – material impact</i> <i>In Discussion</i></p>

³ Text identified as 'In Discussion' extracted from NCC committee meeting minutes, dated 26/10/2022 followed up via ETG meeting 6.

ID	The Applicant Position	NCC Position ³	Position Summary
		Therefore, it was not possible for the LLFA and NCC to agree this approach.	
3.	Sufficient survey data has been collected to inform the assessment as presented within ES Chapter 18 Water Resources and Flood Risk [APP-104] and the Flood Risk Assessment [APP-058].	<p>The data used for the assessment will be mostly secondary data which will be supplemented by a targeted geomorphological walkover survey (compatible with European Committee for Standardisation standard EN 14614 Water quality - Guidance standard for assessing the hydromorphological features of rivers, September 2020) to inform the assessment of impacts at the proposed crossing locations of Main Rivers and Water Framework Directive (WFD) river water bodies.</p> <p>Discussed and agreed during ETG meeting 1, 19/05/2020, with the Internal Drainage Board and the Environment Agency.</p> <p>The LLFA have reviewed the notes from the meeting and would point out that the LLFA were not in attendance to this meeting on 19/5/2020. Therefore, it was not possible for the LLFA and NCC to agree this approach. This approach was with the IDB and the Environment Agency.</p>	<p><i>Agreed /</i> <i>Not Agreed – no material impact</i> <i>Not Agreed – material impact</i> <i>In Discussion</i></p>
EIA – Assessment Methodology			
4.	The study areas identified in Section 18.3 of ES Chapter 18 Water Resources and Flood Risk [APP-104] is appropriate for the assessment.	The project is not currently in a position to enable proper review of the relevant sections of the Environmental Statement at this time as there is not a determined surface water management scheme available to support the design for all the	<i>In Discussion</i>

ID	The Applicant Position	NCC Position ³	Position Summary
		<p>areas of the site. Therefore, the uncompleted sections in this current version of the SoCG response is appropriate at this time.</p>	
5.	<p>The realistic worst-case assumptions presented in the assessment for the development scenarios, as outlined in Table 18-2 of ES Chapter 18 Water Resources and Flood Risk [APP-104] are appropriate.</p>	<p>The project is not currently in a position to enable proper review of the relevant sections of the Environmental Statement at this time as there is not a determined surface water management scheme available to support the design for all the areas of the site. Therefore, the uncompleted sections in this current version of the SoCG response is appropriate at this time.</p>	<p><i>In Discussion</i></p>
6.	<p>The impact assessment methodologies used for the EIA, as presented in Section 18.4 of ES Chapter 18 Water Resources and Flood Risk [APP-104], provide an appropriate approach to assessing potential impacts of the Projects.</p>	<p>Discussed and initially agreed at the ETG meeting 1, 19/05/2022, with the Internal Drainage Board and the Environment Agency. Concerns were raised by the Environment Agency at Section 42 (S42) on the definition of magnitude. This was discussed further at the ETG meeting on 06/09/2021 and resolved 30/09/2021.</p> <p>The LLFA have reviewed the notes from the meeting and would point out that the LLFA were not in attendance to this meeting on 19/5/2020. Therefore, it was not possible for the LLFA and NCC to agree this approach. This approach was with the IDB and the Environment Agency.</p>	<p><i>Agreed / Not Agreed – no material impact Not Agreed – material impact In Discussion</i></p>
7.	<p>The assessment of impacts presented in Section 18.6 of ES Chapter 18 Water Resources and Flood Risk [APP-104] are consistent with the agreed assessment methodologies.</p>	<p>The project is not currently in a position to enable proper review of the relevant sections of the Environmental Statement at this time as there is not a determined surface water management scheme available to support the design for all the areas of the site. Therefore, the uncompleted</p>	<p><i>In Discussion</i></p>

ID	The Applicant Position	NCC Position ³	Position Summary
		sections in this current version of the SoCG response is appropriate at this time.	
8.	Section 18.6 of ES Chapter 18 Water Resources and Flood Risk [APP-104] represents a comprehensive list of the potential impacts.	The project is not currently in a position to enable proper review of the relevant sections of the Environmental Statement at this time as there is not a determined surface water management scheme available to support the design for all the areas of the site. Therefore, the uncompleted sections in this current version of the SoCG response is appropriate at this time.	<i>In Discussion</i>
9.	The assessment of cumulative impacts, as detailed in Section 18.7 of ES Chapter 18 Water Resources and Flood Risk [APP-104] is consistent with the agreed methodologies.	The project is not currently in a position to enable proper review of the relevant sections of the Environmental Statement at this time as there is not a determined surface water management scheme available to support the design for all the areas of the site. Therefore, the uncompleted sections in this current version of the SoCG response is appropriate at this time.	<i>In Discussion</i>
EIA – Project-Alone Assessment Conclusions			
10.	The conclusions of the impact assessment as details in Section 18.6 of ES Chapter 18 Water Resources and Flood Risk [APP-104] are appropriate and are considered not significant in EIA terms.	The project is not currently in a position to enable proper review of the relevant sections of the Environmental Statement at this time as there is not a determined surface water management scheme available to support the design for all the areas of the site. Therefore, the uncompleted sections in this current version of the SoCG response is appropriate at this time.	<i>In Discussion</i>

ID	The Applicant Position	NCC Position ³	Position Summary
EIA – Cumulative Impact Assessment (CIA) Conclusions			
11.	The conclusions of the CIA as details in Section 18.7 of ES Chapter 18 Water Resources and Flood Risk [APP-104] are appropriate and are considered not significant in EIA terms.	The project is not currently in a position to enable proper review of the relevant sections of the Environmental Statement at this time as there is not a determined surface water management scheme available to support the design for all the areas of the site. Therefore, the uncompleted sections in this current version of the SoCG response is appropriate at this time.	<i>In Discussion</i>
Draft DCO / Outline Management Plans / Mitigation and Monitoring			
12.	Schedule 2, Part 1, Requirement 17 of the Draft DCO [AS-009] is appropriate with regards to the protection of water resource receptors.	The project is not currently in a position to enable proper review of the relevant sections of the Environmental Statement at this time as there is not a determined surface water management scheme available to support the design for all the areas of the site. Therefore, the uncompleted sections in this current version of the SoCG response is appropriate at this time.	<i>In Discussion</i>
13.	The Outline Code of Construction Practice [APP-302] includes all relevant mitigation measures specified in ES Chapter 18 Water Resources and Flood Risk [APP-104] and is appropriate for managing construction impacts from the Projects on water resources and flood risk receptors.	The project is not currently in a position to enable proper review of the relevant sections of the Environmental Statement at this time as there is not a determined surface water management scheme available to support the design for all the areas of the site. Therefore, the uncompleted sections in this current version of the SoCG response is appropriate at this time.	<i>In Discussion</i>
Other Matters as Required			
14.	The approach to, assessment methodology and conclusions of the Flood Risk Assessment [APP-058] are appropriate.	The project is not currently in a position to enable proper review of the relevant sections of the Environmental Statement at this time as there is	<i>In Discussion</i>

ID	The Applicant Position	NCC Position ³	Position Summary
		<p>not a determined surface water management scheme available to support the design for all the areas of the site. Therefore, the uncompleted sections in this current version of the SoCG response is appropriate at this time.</p>	
15.	<p>A climate change allowance of +20% should be used for the Flood Risk Assessment (FRA) and the design of the permanent onshore infrastructure (e.g. the Onshore Substation).</p> <p>NCC stated that Flood Studies Report (FSR) rainfall data is no longer acceptable and agreed that Flood Estimation Handbook (FEH) 2013 rainfall data will be accepted</p>	<p>Discussed and agreed in ETG meeting 1, 19/05/2020, with the Internal Drainage Board and the Environment Agency.</p> <p>During the ETG meeting 7 with the LLFA on 06/12/2022, the Applicant notes that the discussion included consideration of appropriate climate change allowances to apply. It was agreed, with the LLFA, that in the absence of information related to the Decommissioning Phase an allowance of 45% for climate change would be applied. This has been included within updated documentation to be provided by the Applicant.</p> <p>The LLFA have reviewed the meeting notes and observes the LLFA were not in attendance to the meeting on 19/5/2020. Since 2020 there has been an update in the Environment Agency climate change guidance for Flood Risk Assessments which must be reflected in this application. Therefore, the LLFA expects the latest climate change allowances to be applied in the assessment and design of the proposed development.</p>	Agreed
16.	<p>The approach to site selection and the sequential test in relation to the Onshore Substation (OnSS) site is appropriate.</p>	<p>Agreed in ETG meeting 5 (Part 1), 24/07/2022 that in principle the LLFA are in agreement with selection and sequential layout of ONSS.</p>	Agreed

ID	The Applicant Position	NCC Position ³	Position Summary
		The LLFA are in agreement with this item.	
17.	<p>The approach adopted to development of a surface water model at the OnSS is considered appropriate, details of which can be found in the Flood Risk Assessment [APP-058].</p> <p>This approach was discussed and agreed at ETG meeting 2 with the Lead Local Flood Authority (LLFA), 11/11/2021.</p>	<p>Surface water hydraulic modelling has been developed to provide an evidence base for the FRA, with regard to the surface water flood risk in the vicinity of the OnSS. This modelling subsequently influenced the design of the OnSS.</p> <p>During the ETG meeting 7 with the LLFA on 06/12/2022, the discussion included consideration of elements of the surface water hydraulic modeling which require updating and clarification. This clarification is included within updated documentation to be provided by the Applicant.</p> <p>The Applicant notes that this is separate to hydraulic modelling to be undertaken to inform the surface water drainage design, as discussed at ETG meeting 6, 23/11/2022.</p>	In Discussion
18.	<p>OnSS drainage options, including deep infiltration alongside the option to discharge into the Anglian water foul sewer following the SuDS hierarchy, have been explored adequately, details of which can be found in the Flood Risk Assessment [APP-058] and the Outline Operational Drainage Plan (Onshore Substation) [APP-307].</p>	<p>Potential drainage options at the OnSS and the SuDS hierarchy were discussed at multiple ETG meetings, including 06/09/2021, 11/11/2021, 10/02/2022, 07/04/2022 and 24/07/2022.</p> <p>The Applicant and the LLFA agreed the approach to the presentation of both options comprising deep infiltration as well as discharge to the foul sewer network as part of the DCO application (ETG meeting 4, 07/04/2022).</p> <p>The Applicant presented an update on the approach to drainage and confirmed the preferred approach is to adopt shallow infiltration, based on</p>	In Discussion

ID	The Applicant Position	NCC Position ³	Position Summary
		<p>the ongoing results from the recent ground investigations at the ETG meeting 6 on 23/11/2022. This was also confirmed at the ETG meeting 7 on 06/12/2022 and the Applicant noted a change to the DCO will be submitted to reflect this approach.</p> <p>The Applicant submitted a request for a non - material change to the Application on 13/01/2023. The Applicant has confirmed that infiltration directly into the shallow granular zone can be adopted. Therefore, no further agreements with the Environment Agency are required for this approach. This clarification is to be included within updated documentation to be provided by the Applicant.</p> <p>The LLFA reminds the applicant that should the infiltration depth of the "shallow infiltration" structures be greater than 2m, the LLFA will need to see a written "in principle agreement" from the Environment Agency and steps agreed with the Environment Agency to obtain any relevant environmental permitting as part of the application.</p>	
19.	<p>Adequate evidence to support the understanding of surface water flood risk at the OnSS has been provided.</p> <p>The Applicant and LLFA agreed that site-specific evidence from surface water modelling to be provided as part of the DCO application to support understanding of surface water flood risk at the OnSS. All parties agreed there is some uncertainty around the existing surface water flood mapping (hosted, but not owned, by the Environment Agency) in this location.</p>	<p>The project would need to demonstrate that the proposed development is in accordance with National Planning Policy Framework (NPPF) with regard to the risk of flooding. There is currently insufficient information to demonstrate that surface water arising from the development would not result in an increase of flood risk to the proposed development at the Onshore Sub-Station or elsewhere. Insufficient information is limited to the risk associated with the adoption of the option for</p>	In Discussion

ID	The Applicant Position	NCC Position ³	Position Summary
	<p>Discussed during ETG meeting 4, 07/04/2022 (Part 2, PM).</p>	<p>discharge of surface water to foul sewer (ETG 6, 23/11/2022).</p> <p>The Applicant submitted a request for a non - material change to the Application on 13/01/2023. The Applicant has confirmed that infiltration directly into the shallow granular zone can be adopted. Therefore, insufficient information being limited to the risk associated with the adoption of the option for discharge of surface water to foul sewer has fallen away.</p>	
20.	<p>The updated layout of the OnSS, which includes for either a N-S or E-W orientation for the OnSS, is preferred to the original proposed layout and avoids the majority of the area identified in the 100-year surface water flood risk in the national dataset.</p> <p>Discussed and agreed at ETG meeting 4, 07/04/2022 (Part 2, PM).</p>	<p>Surface water hydraulic modelling has been developed to provide an evidence base for the FRA, with regard to the surface water flood risk in the vicinity of the OnSS. This modelling subsequently influenced the design of the OnSS.</p> <p>This modelling was subject to further review by the LLFA following discussion at ETG meeting 6 on 23/11/2022 and the provision of 6.3.18.2.2 Environmental Statement - Appendix 18.2 – Annex 18.2.2 - Onshore Substation Hydraulic Modelling Technical Note [APP-211].</p> <p>During the ETG meeting 7 with the LLFA on 06/12/2022, the discussion included consideration of elements of the surface water hydraulic modeling which require updating and clarification. This clarification is included within updated documentation to be provided by the Applicant.</p> <p>It is agreed by the Applicant and the LLFA that the updated layout of the OnSS avoids the majority of the area shown to be at surface water flood risk.</p>	In Discussion

ID	The Applicant Position	NCC Position ³	Position Summary
		<p>The Applicant notes that this is separate to hydraulic modelling to be undertaken to inform the surface water drainage design, as discussed at ETG meeting 6, 23/11/2022.</p>	
21.	<p>Layout changes to the OnSS footprint have minimised the interaction with the flood extent in events up to and including the 1 in 100-year with 40% climate change allowance.</p> <p>Post development modelling results have not yet been produced, but it is anticipated that the ponded area will increase in depth in certain areas.</p>	<p>NCC agreed that given the evidence presented this does not raise any concern.</p> <p>Discussed and agreed at ETG meeting 5 (Part 1) 24/07/2022.</p> <p>The LLFA has reviewed Document 6.3.18.2.2 Environmental Statement Appendix 18.2.2 - Annex 18.2.2 - Onshore Substation Hydraulic Modelling Technical Note [APP-211].</p> <p>During the ETG meeting 7 with the LLFA on 06/12/2022, the Applicant notes that the discussion included consideration of appropriate climate change allowances to apply. It was agreed, with the LLFA, that in the absence of information related to the Decommissioning Phase an allowance of 45% for climate change would be applied. This has been included within updated documentation to be provided by the Applicant.</p> <p>The LLFA agrees with the position statement and the "Agreed" position summary. The LLFA has since reviewed the updated Modelling summary report (provided in November 2022). The LLFA</p>	Agreed

ID	The Applicant Position	NCC Position ³	Position Summary
		<p>notes the applicant should confirm whether the application will apply the 45% climate change allowance for the 2100 and beyond flood risk development life or whether a decommissioning plan will be provided to demonstrate the returning of the site back to its original agricultural land use to support the application.</p>	
22.	<p>The Outline Operational Drainage Plan (OPD) [APP-307] sets out the principles for the development of the operational drainage at the onshore project substation.</p> <p>This is in accordance with the principles of Sustainable Drainage Systems discharge hierarchy. The final Operational Drainage Plan will be developed in accordance with the outline plan, in consultation with Norfolk County Council.</p> <p>The Onshore Substation Drainage Strategy identified two viable options to manage surface water drainage at the onshore substation site:</p> <ul style="list-style-type: none"> • Attenuation combined with infiltration; and • Attenuation with onward connection to foul sewer network. <p>A final ODP will be produced prior to construction of SEP and DEP and will be in accordance with the content of this Outline ODP and the final design of the Project.</p> <p>The ODP is secured by Requirement 17 of the Draft DCO [AS-009].</p>	<p><i>At present, two outline surface water drainage designs have been developed but neither has been selected as the preferred option as the applicant is not yet able to state where they are intending to discharge surface water to for disposal. Further information on the proposed surface water drainage will need to be provided for the LLFA to review.</i></p> <p><i>There is a lack of confirmation of where the surface water drainage proposals for the onshore substation will drain, site specific greenfield runoff rates and volumes, the comparable post-development runoff rate and volumes proposed to prevent an increased risk of flooding elsewhere.</i></p> <p><i>Further consideration of the surface water flood risk associated with discharging to the foul sewer in Swainsthorpe and the residual risks.</i></p> <p><i>To prevent flooding in accordance with NPPF paragraph 167, 169 and 174 by ensuring the satisfactory management of local flood risk, surface water flow paths, storage, and disposal of surface water from the site in a range of rainfall events and</i></p>	In Discussion

ID	The Applicant Position	NCC Position ³	Position Summary
		<p><i>ensuring the sustainable drainage systems proposed operates as designed for the lifetime of the development.</i></p> <p><i>The LLFA would remove its holding objection if the following issues are adequately addressed:</i></p> <ol style="list-style-type: none"> <i>1. An updated FRA and Drainage Strategy that confirms the proposed surface water discharge location for the onshore sub-station.</i> <i>2. The provision of the site-specific greenfield runoff rates and volumes, the comparable post-development runoff rate and volumes.</i> <i>3. An updated hydraulic model that appropriately applies the latest climate change allowances and provides an assessment of the change is flood risk.</i> <i>4. Adequate consideration of the surface water flood risk associated with discharging to the foul sewer in Swainsthorpe and the residual risks.</i> <i>5. A maintenance and management plan detailing the activities required and details of who will adopt and maintain all the surface water drainage features for the lifetime of the development.</i> <p><i>The above matters were discussed further at ETG 6 (23/11/2022)</i></p>	

ID	The Applicant Position	NCC Position ³	Position Summary
		The LLFA are satisfied this is consistent with the recent response provided by the LLFA. The LLFA looks forward to the continuing discussion with the applicant to address the outstanding matters.	
23.	The Outline Code of Construction Practice [APP-302] includes all relevant mitigation measures specified in ES Chapter 18 Water Resources and Flood Risk (APP-104) and is appropriate for managing construction and post construction impacts from Projects on water resources and flood risk.		<i>Agreed / Not Agreed – no material impact Not Agreed – material impact In Discussion</i>

2.3 Onshore Archaeology and Cultural Heritage

Table 6: Summary of consultation with NCC regarding onshore archaeology and cultural heritage

Date	Contact Type	Topic
Pre-Application		
14/01/2020	ETG meeting 1	The following topics were discussed during the ETG meeting 1: <ul style="list-style-type: none"> The approach to baseline and survey status. The approach to assessment methodology.
21/10/2020	ETG meeting 2	The following topics were discussed during the ETG meeting 2: <ul style="list-style-type: none"> The approach to obtaining desk-based data. The approach to and location of heritage viewpoints.
03/06/2021	Section 42 Consultation	Norfolk County Council response to Section 42 consultation on the PEIR. Appendix 4 of the Consultation Report (APP-033).
17/07/2021	ETG meeting 3	The following topics were discussed during the ETG meeting 3: <ul style="list-style-type: none"> The approach to the worst-case scenarios. The approach to ongoing surveys. Agreement to Written Scheme of Investigation (WSI) for Ground Investigations (GI).
16/08/2021	ETG meeting 4	The following topics were discussed during the ETG meeting 4: <ul style="list-style-type: none"> The approach to identifying archaeological potential. Agreement to the approach to ongoing surveys. Agreement to the location of heritage viewpoints. Confirmation that pre-application trial trenching is not required.
06/04/2022	ETG meeting 5	The following topics were discussed during the ETG meeting 5: <ul style="list-style-type: none"> Agreement to monitor the second phase of GI works Agreement on the mitigation approaches as detailed in Outline WSI (Onshore)
08/04/2022	ETG meeting 6 ⁴	The following topics were discussed during the ETG meeting 6: <ul style="list-style-type: none"> Agreement on approach to assessment for temporary works area.

⁴ Note NCC did not attend ETG 6.

Date	Contact Type	Topic
		<ul style="list-style-type: none"> Agreement on the mitigation approaches as detailed in Outline WSI (Onshore)
Post-Application		
06/02/2023	Email	Email correspondence with NCC position relating to onshore archaeology and cultural heritage.

Table 7: Topics agreed, in discussion or not agreed in relation to onshore archaeology and cultural heritage

ID	The Applicant Position	NCC Position	Position Summary
EIA – Policy and Planning			
1	All relevant plans and policies have been identified in Section 21.4 of ES Chapter 21 Onshore Archaeology and Cultural Heritage [APP-107] and these have been appropriately considered in the assessment.	NCC agree with the statement.	<i>Agreed</i>
EIA – Baseline Environment			
2	The ES adequately characterises the baseline environment in terms of onshore archaeology and cultural heritage as detailed in Section 21.5 of ES Chapter 21 Onshore Archaeology and Cultural Heritage [APP-107].	NCC agree with the statement.	<i>Agreed</i>
3	Sufficient survey data has been collected to inform the assessment as presented within ES Chapter 21 Onshore Archaeology and Cultural Heritage (APP-107).	Agreed in ETG meeting 1, 14/01/2020 on the approach to baseline surveys, and potential additional surveys, being suitable for the characterisation of the study area and onshore project boundary for EIA purposes. Agreed that if any Engineering-led Ground Investigation (GI) works are planned for the project, Norfolk County Council (NCC) Historic Environment Service (HES) and Historic England (HE) should review the methodology and provision for associated archaeological watching brief and/or geoarchaeological monitoring. It was also agreed that Analysis of Lidar and aerial photographic data will primarily be undertaken within the 200m onshore cable corridor and will also include a suitable small buffer out with the onshore project boundary. Following this, locations for priority archaeological geophysical surveys would be agreed with NCC HES.	<i>Agreed</i>

ID	The Applicant Position	NCC Position	Position Summary
		<p>Agreed in ETG meeting 3, 17/07/2021 that the geoarchaeologist will be producing the WSI for the GI works. The WSI will be produced as a single document for all GI locations and be submitted to NCC.</p>	
4	<p>The approach to the selection of priority geophysical survey areas was appropriate and sufficient to inform the assessment of impacts.</p>	<p>Agreed in ETG meeting 3, 17/07/2021 that in the event the current priority geophysical (magnetometry) survey works/results are not completed in time for the submission, works will still continue wherever possible, although aware they will not form part of the examination.</p> <p>Consultation and flow of information would continue alongside examination. Agreed to focus on cropped land for surveys but would not stop efforts to engage with landowners currently refusing access.</p>	Agreed
5	<p>Heritage setting viewpoint locations are representative and appropriate.</p>	<p>Agreed at ETG meetings 2 and 4, 21/10/2020 and 16/08/2021 respectively that heritage viewpoints presented and suggested a further viewpoint taken from within Venta Icenorum. Agreed that ongoing consultation would be useful given the timeframes and absence of photomontages and setting assessment from the PEIR. ETG 4 agreed on the locations of the heritage viewpoints within the 5km study area of the substation.</p> <p>NCC advise that it is Historic England and the conservation officers at District level who comment on this as it is related to designated heritage assets.</p>	NA
6	<p>Archaeological trial trenching is not required to inform the assessment of impacts pre-application. Further mitigation will be completed post consent.</p>	<p>Agreed at ETG meeting 4, 16/08/2022.</p> <p>NCC strongly encourage the applicant to pro-actively advance the stages of archaeological investigation, including trial trenching when opportunities in the farming year and/or</p>	Agreed

ID	The Applicant Position	NCC Position	Position Summary
		<p>access to land presents themselves, regardless of what stage the NSIP consenting process is at.</p> <p>NCC consider that all post-consent archaeological works are mitigation</p>	
7	<p>The approach to obtaining desk-based data, as detailed in ES Chapter 21 Onshore Archaeology and Cultural Heritage [APP-107] and associated appendices is appropriate.</p>	<p>Agreement on the list of data sources for the desk-based assessment with regards to onshore archaeology and cultural heritage in ETG meeting 1, 14/01/2020.</p> <p>Agreed with approach to obtaining aerial photos and historic maps given current closures of record offices at ETG meeting 2, 21/10/2020.</p>	Agreed
EIA – Assessment Methodology			
8	<p>Agreement on the list of categories of key known and potential heritage assets for consideration with regard to onshore archaeology and cultural heritage.</p>	<p>Agreed at ETG Meeting 1 14/01/2020.</p>	Agreed
9	<p>The study areas identified in Section 21.3 of ES Chapter 21 Onshore Archaeology and Cultural Heritage [APP-107] are appropriate for the assessment.</p>	<p>NCC agree with the statement.</p>	<i>Agreed</i>
10	<p>The realistic worst-case assumptions presented in the assessment for the development scenarios, as outlined in Table 21-2 of ES Chapter 21 Onshore Archaeology and Cultural Heritage [APP-107] are appropriate.</p>	<p>Agreed in ETG meeting 3, 17/07/2021 that the worst-case scenario in the ES will be amended to consider qualitatively how the project could change the historic seascape character, rather than being based just on numbers. This will include incorporation of available data to update the HSC as relevant to SEP and DEP.</p>	Agreed

ID	The Applicant Position	NCC Position	Position Summary
11	The impact assessment methodologies as presented in Section 21.4 of ES Chapter 21 Onshore Archaeology and Cultural Heritage [APP-107] are appropriate to assess the potential impacts of the project.	NCC agree with the statement.	Agreed
12	The approach to identifying archaeological potential was agreed in ETG meeting 4, 16/08/2021. Early Saxon finds from the HER have been assessed for sites, alongside further review of Natural England Landscape character assessments, and historic landscape characterisation to inform the different landscape types and period potential across the different landscapes zones which the onshore cable route runs through.	NCC agree with the statement.	Agreed
13	With respect to the proposed onshore substation, and potential impacts associated with changes to the setting of heritage assets, it was confirmed that Landscape and Visual Impact Assessment (LVIA) tool kits, including e.g. zones of theoretical visibility and photomontages, would be used to inform assessment.	Agreed at ETG Meeting 1 14/01/2020. NCC advise that it is Historic England and the conservation officers at District level who comment on this as it is related to designated heritage assets.	NA
14	The assessment of impacts presented in Section 21.6 of ES Chapter 21 Onshore Archaeology and Cultural Heritage [APP-107] are consistent with the agreed assessment methodologies.	Agreed impact assessment methodologies in ETG meeting 1, 14/01/2020.	Agreed
15	Section 21.6 of ES Chapter 21 Onshore Archaeology and Cultural Heritage [APP-107] represents a comprehensive list of the potential impacts.	NCC agree with the statement.	Agreed

ID	The Applicant Position	NCC Position	Position Summary
16	The assessment of cumulative impacts, as detailed in Section 21.7 of ES Chapter 21 Onshore Archaeology and Cultural Heritage [APP-107] is consistent with the agreed methodologies.	<p>Agreement of the proposed approach to cumulative impact assessment was discussed and agreed at ETG meeting 1, 14/01/2020.</p> <p>It is recognised that a strategic study of cumulative impact from multiple offshore renewables projects is required at an industry level. This is beyond the scope of individual projects. However, cumulative impacts will be assessed and will include information on other developments in the area, including archaeological information from other projects in the region, where possible.</p>	Agreed
EIA – Project-Alone Assessment Conclusions			
17	The conclusions of the impact assessment as detailed in Section 21.6 of ES Chapter 21 Onshore Archaeology and Cultural Heritage [APP-107] are appropriate and, assuming the inclusion of proposed mitigation and post-consent mitigation, are considered not significant in EIA terms.	NCC agree with the statement.	Agreed
EIA – Cumulative Impact Assessment (CIA) Conclusions			
18	The conclusions of the CIA, as detailed in Section 21.7 of ES Chapter 21 Onshore Archaeology and Cultural Heritage [APP-107] are appropriate and based on currently available information and proposed mitigation impacts are not significant in EIA terms.	NCC agree with the statement.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring			
19	The measures identified in the Outline Written Scheme of Investigation [APP-308] are appropriate and adequate.	Agreed in ETG meeting 5, 06/04/2022 to remove approaches to ‘Set Piece Excavation’ and ‘Strip, Map and Sample’, and to combine these two types of mitigation to fall under the heading ‘Archaeological Excavation’ within the Outline WSI (Onshore).	Agreed

ID	The Applicant Position	NCC Position	Position Summary
20	Schedule 2, Part 1, Requirement 18 of the draft DCO (AS-009) is sufficient to secure the measures identified in the Outline Written Scheme of Investigation (APP-308).	NCC agree with the statement.	Agreed

2.4 Traffic and Transport

Table 8: Summary of consultation with NCC regarding traffic and transport

Date	Contact Type	Topic
Pre-Application		
23/03/2020	ETG meeting 1	<p>The following topics were discussed during the ETG meeting 1:</p> <ul style="list-style-type: none"> • The scope of the Transport Method Statement; • The proposed impact assessment methodology; • The approach to deriving construction traffic; • The approach to distribution of HGV and employee construction traffic; • No requirement for a separate Travel Plan and Requirement for a stand-alone Transport Assessment ; and • The approach to deriving future baseline traffic flows.
18/09/2020	ETG meeting 2	<p>The following topics were discussed during the ETG meeting 2:</p> <ul style="list-style-type: none"> • Confirmation of ETG meeting 1 agreements; • The approach to the baseline data collection; • The approach to the distribution of HGV traffic; and • The approach to considering operational and decommissioning phase impacts.
03/06/2021	Section 42 Consultation	Norfolk County Council response to Section 42 consultation on the PEIR. Appendix 4 of the Consultation Report (APP-033)
13/07/2021	ETG meeting 3	<p>The following topics were discussed during the ETG meeting 3:</p> <ul style="list-style-type: none"> • Confirmation of ETG meeting 1 and 2 agreements; • The extent of the Traffic and Transport Study Area; • The scope of the Transport Assessment; • The validity of the baseline traffic flows; • Driver delay, capacity, assessment methodology; • Impacts assessment findings; • Outline access designs; and • Cumulative impacts.
31/03/2022	ETG meeting 4	ETG meeting 3 topics were re-visited.
05/04/2022	ETG meeting 5	NCC did not attend ETG 5 (National Highways only).
Post-Application		
16/02/2023	Email	Email correspondence with NCC position relating to traffic and transport.

Table 9: Topics agreed, in discussion or not agreed in relation to traffic and transport

ID	The Applicant Position	NCC Position	Position Summary
EIA – Policy and Planning			
1.	All relevant plans and policies have been identified in Section 24.4 of ES Chapter 24 Traffic and Transport [APP-110] and these have been appropriately considered in the assessment.	Agreed	Agreed
EIA – Baseline Environment			
2.	The ES adequately characterises the baseline environment in terms of traffic and transport as detailed in Section 21.5 of ES Chapter 24 Traffic and Transport [APP-110].	Agreed	Agreed
3.	Sufficient survey data (extent/duration) has been collected to inform the characterisation of the baseline environment and the assessment as presented within ES Chapter 24 Traffic and Transport [APP-110].	Agreed at the ETG meeting 3 (13/07/2021) that the baseline traffic data presented in the PEIR could be utilised for the Development Consent Order (DCO) application, but that the Outline Construction Traffic Management Plan (OCTMP) (APP-301) would contain a clause that permits further assessment of network capacity constraints at identified sensitive junctions if baseline traffic conditions are evidenced to have changed materially from those of the DCO application post consent.	Agreed
4.	Baseline data collection is deemed appropriate for neutral daily traffic flows and road safety data.	Agreed at ETG meeting 1, 23/03/2020.	Agreed
5.	2025 is considered appropriate as a base year for the assessment.	Agreed at ETG meeting 2 (18/09/2020) to consider 2025 as a base year for the purposes of the EIA.	Agreed
EIA – Assessment Methodology			

ID	The Applicant Position	NCC Position	Position Summary
6.	The study areas identified in Section 24.3 of ES Chapter 24 Traffic and Transport [APP-110] is appropriate for the assessment.	The extent of the Traffic and Transport Study (TTSA) area was agreed at ETG meeting 3 (13/07/2021).	Agreed
7.	The approach to scoping out assessment of SEP and DEP traffic and transport operational and decommissioning impacts is acceptable.	Agreed at ETG meeting 2 (18/09/2020) that operational and decommissioning impacts can be scoped out of the EIA.	Agreed
8.	The approach to scoping out assessment of SEP and DEP traffic and transport impacts associated with vehicle movements for the offshore phases via the base port is acceptable.	Agreed at ETG meeting 1 (23/03/2020) that the approach assessment of traffic movements to the base port can be scoped out of the EIA.	Agreed
9.	The impact assessment methodologies used for the assessment, as presented in Section 24.4 of ES Chapter 24 Traffic and Transport [APP-110], represent an appropriate approach to assessing potential impacts.	The Impact Assessment Methodology was agreed at ETG meeting 1 (23/03/2020). It was agreed that the EIA would assess the impact upon: Driver Delay; Severance; Pedestrian and Cycle Amenity; Pedestrian and Cycle Delay; Road Safety; and Abnormal Loads.	Agreed
10.	The assessment of impacts presented as detailed in Section 24.6 of ES Chapter 24 Traffic and Transport [APP-110] are consistent with the agreed assessment methodologies.	Agreed	Agreed
11.	Section 24.6 of the ES Chapter 24 Traffic and Transport [APP-110] represents a comprehensive list of the potential impacts.	Agreed at ETG meeting 1 (23/03/2020).	Agreed
12.	The assessment adequately defines the realistic worst-case scenario for traffic demand. The worst-case scenario is detailed in Table 24.2 of ES Chapter 24 Traffic and Transport [APP-110].	Agreed	Agreed

EIA – Project-Alone Assessment Conclusions

ID	The Applicant Position	NCC Position	Position Summary
13.	Residual severance, amenity and pedestrians delay impacts, as presented in Section 24.6 of ES Chapter 24 Traffic and Transport [APP-110] during construction are not-significant in EIA terms assuming the inclusion of the proposed mitigation.	Impacts were discussed with NCC at ETG meeting 4 (31/03/2022).	Agreed
14.	Residual road safety impacts, as presented in Section 24.6 of ES Chapter 24 Traffic and Transport [APP-110] during construction are not-significant in EIA terms assuming the inclusion of the proposed mitigation.	Agreed	Agreed
15.	Residual impacts driver delay (capacity), as presented in Section 24.6 of ES Chapter 24 Traffic and Transport [APP-110] during construction are non-significant in EIA terms assuming the inclusion of the proposed mitigation.	Agreed	Agreed
16.	Residual impacts driver delay (highway constraints), as presented in Section 24.6 of ES Chapter 24 Traffic and Transport [APP-110] during construction are non-significant in EIA terms assuming the inclusion of the proposed mitigation.	Agreed	Agreed
17.	Residual impacts driver delay (road closures), as presented in Section 24.6 of ES Chapter 24 Traffic and Transport [APP-110] during construction are non-significant in EIA terms assuming the inclusion of the proposed mitigation.	Agreed that NCC had no further comments in relation to driver delay (road closures) following confirmation at ETG meeting 3 (13/07/2021) that Taverham Road, Inkwood Lane, Ringland Lane and Oulton Street will also be crossed using trenchless techniques (e.g. HDD).	Agreed
18.	Residual impacts abnormal loads – special order vehicles, as presented in Section 24.6 of ES Chapter 24 Traffic and Transport [APP-110] during construction are non-significant in EIA terms assuming the inclusion of the proposed mitigation.	NCC structures team have provided agreement in principle to the movement of the SEP and DEP transformers as outlined within the Abnormal Indivisible Load (AIL) Study [APP-270].	Agreed

ID	The Applicant Position	NCC Position	Position Summary
19.	Residual impacts abnormal loads – non-special order vehicles, as presented in Section 24.6 of ES Chapter 24 Traffic and Transport [APP-110] during construction are non-significant in EIA terms assuming the inclusion of the proposed mitigation.	Agreed at ETG meeting 4 (31/03/2022) that non-special order abnormal load movements can be dealt with post consent through the CTMP [APP-301]. Agreed on the approach to make commitment in OCTMP to agree with NCC on the size of loads and route appropriate for each access.	Agreed
20.	The outline design of the secondary compound access from the A148 (access ACC75) is appropriate, as presented in Annex 30 of the Transport Assessment [APP-268 and APP-269].	Agreed at ETG meeting 4 (31/03/2022) that the outline design for access from the A148 to a secondary compound is acceptable (subject to scheduling works away from the school holiday season).	Agreed
21.	The outline design of the onshore substation access from A140 is appropriate (access ACC10), as presented in Annex 30 of the Transport Assessment [APP-268 and APP-269].	Agreed at ETG meeting 4 (31/03/2022) that the outline design for access from the A140 to the onshore substation is acceptable.	Agreed
22.	The outline design of the main compound access from the A1067/ Old Fakenham Road (access ACC33) is appropriate, as presented in Annex 30 of the Transport Assessment [APP-268 and APP-269].	The applicants indicate improvements will be made to visibility at the adjacent road junctions and have demonstrated they can provide the required visibility splays utilising land within the order limits. However, the splays will impact on hedges and require hedgerow removal. NCC have asked for a 90m splay and the applicants have agreed, however we are unable to find any reference to the 90m splay within the application. This needs to be captured within the CTMP and the drawings at Annex 30 updated to show the hedgerow impacts before we can agree.	In Discussion
23.	The use of the existing A140 quarry access (ACC74) to access to the onshore substation is acceptable.	Agreed at ETG meeting 4 (31/03/2022) that access to the onshore substation could be taken from the existing quarry access and that traffic could cross Mangreen Lane via a priority-controlled junction.	Agreed

ID	The Applicant Position	NCC Position	Position Summary
EIA – Cumulative Impact Assessment (CIA) Conclusions			
24.	Cumulative impacts assessment with other windfarms, as presented in Section 24.7 of ES Chapter 24 Traffic and Transport [APP-110], is appropriate and based on currently available information and proposed mitigation impacts are not significant in EIA terms.	Further discussion is required with NCC to confirm their position.	In Discussion
25.	Cumulative impacts assessment on with other schemes, as presented in Section 24.7 of ES Chapter 24 Traffic and Transport [APP-110], is appropriate and based on currently available information and proposed mitigation impacts are not significant in EIA terms.	Agreed at ETG meeting 3 (13/07/2021) that potential cumulative impacts between the construction phases of the identified highways schemes and SEP and DEP could be assessed post consent as part of the respective Construction Traffic Management Plans (CTMPs) rather than in the DCO application.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring			
26.	Schedule 2, Part 1, Requirement 15 of the draft DCO (AS-009) is sufficient to secure the measures identified in the Outline Construction Traffic Management Plan [APP-301].	Agreed	Agreed
27.	The mitigation measures within the Outline Construction Traffic Management Plan (CTMP) [APP-301] are adequate and appropriate to mitigate likely significant impacts identified in the ES Chapter 24 Traffic and Transport [APP-110].	Agreed – save for the mitigation required at the main site compound as detailed above.	In Discussion
28.	<p>The access concept designs set out in the [APP-301] are appropriate. Detailed access designs will be developed and agreed with NCC prior to the start of construction, secured by Requirement 16 of the draft DCO [APP-024].</p> <p>Detailed access designs will be developed and agreed with NCC prior to the start of construction, secured by Requirement 16 of the draft DCO [APP-024].</p>	We are content with this approach	Agreed

ID	The Applicant Position	NCC Position	Position Summary
29.	The monitoring procedures set out in the Outline CTMP [APP-301] are appropriate.	Agreed	Agreed

2.5 Socio-economics and Tourism

Table 10: Summary of consultation with NCC regarding socio-economics and tourism

Date	Contact Type	Topic
Pre-Application		
03/06/2021	Section 42 Consultation	Norfolk County Council response to the Section 42 consultation on the PEIR. Appendix 4 of the Consultation Report (APP-033)
Post-Application		
03/02/2023	Email	Email correspondence with NCC position relating to socio-economics and tourism.

Table 11: Topics agreed, in discussion or not agreed in relation to socio-economics and tourism

ID	The Applicant Position	NCC Position	Position Summary
EIA – Policy and Planning			
1.	All relevant plans and policies have been identified in Section 27.4 of ES Chapter 27 Socio-economics and Tourism [APP-113] and these have been appropriately considered in the assessment.	NCC agree with the statement.	Agreed
EIA – Baseline Environment			
2.	Appropriate datasets have been presented to inform the assessments as detailed in ES Chapter 27 Socio-economics and Tourism [APP-113].	NCC agree with the statement.	Agreed
3.	The ES adequately defines the baseline environment in terms of socio-economics as detailed in Section 27.5 of ES Chapter 27 Socio-economics and Tourism [APP-113].	NCC agree with the statement.	Agreed
EIA – Assessment Methodology			
4.	The study areas identified in Section 27.3 of ES Chapter 27 Socio-economics and Tourism [APP-113] is appropriate for the assessment.	NCC agree with the statement.	Agreed
5.	The impact assessment methodologies, as presented in Section 27.4 of ES Chapter 27 Socio-economics and Tourism [APP-113] are appropriate to assess the potential impacts of the project.	NCC agree with the statement.	Agreed
6.	The realistic worst-case assumptions presented in the assessment for the development scenarios, as outlined in Table 27-2 of ES Chapter 27 Socio-economics and Tourism [APP-113] are appropriate.	NCC agree with the statement.	Agreed
7.	The assessment of impacts presented in Section 27.6 of ES Chapter 27 Socio-economics and Tourism [APP-113] are consistent with the agreed assessment methodologies.	NCC agree with the statement.	Agreed

ID	The Applicant Position	NCC Position	Position Summary
8.	Section 27.6 of ES Chapter 27 Socio-economics and Tourism [APP-113] represents a comprehensive list of the potential impacts.	NCC agree with the statement.	Agreed
9.	The assessment of cumulative impacts, as detailed in Section 27.7 of ES Chapter 27 Socio-economics and Tourism [APP-113] is consistent with the agreed methodologies.	NCC agree with the statement.	Agreed
EIA – Project-Alone Assessment Conclusions			
10.	The conclusions of the impact assessment, as presented in Section 27.6 of ES Chapter 27 Socio-economics and Tourism [APP-113] during construction and operation are appropriate. Adverse impacts are considered not significant in EIA terms based on currently available information.	NCC agree with the statement.	Agreed
EIA – Cumulative Impact Assessment (CIA) Conclusions			
11.	The conclusions of the CIA, as presented in Section 27.7 of ES Chapter 27 Socio-economics and Tourism [APP-113], is appropriate, and based on currently available information and proposed mitigation, adverse impacts are non-significant in EIA terms.	NCC agree with the statement.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring			
12.	The measures detailed in the Outline Skills and Employment Plan (OSEP) [APP-310] are appropriate to maximise local opportunities associated with construction, operation, and maintenance of the projects.	Under discussion – pending update of OSEP with key NCC recommendations and including outcomes from new Local Skills Improvement Plan (LSIP) process dialogue (Norfolk Chambers)	In Discussion
13.	The requirement for a Skills and Employment Plan is adequately secured in the draft DCO [AS-009]. The Skills and Employment Plan will be submitted to and approved by the relevant planning authority for each phase of onshore works.	NCC agree with the statement but the OSEP will now also include Norfolk Chambers of Commerce.	Agreed

3 Signatures

The above draft Statement of Common Ground is agreed between the Applicant and NCC on the day specified below.

<p>Signed: _____</p> <p>Print Name: _____</p> <p>Job Title: _____</p> <p>Date: _____</p> <p>Duly authorised for and on behalf of the Norfolk County Council</p>
<p>Signed: _____</p> <p>Print Name: _____</p> <p>Job Title: _____</p> <p>Date: _____</p> <p>Duly authorised for and on behalf of Equinor New Energy Limited</p>

References

Department for Communities and Local Government (2015) Planning Act 2008: Guidance for the examination of applications for development consent. [Online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418015/examinations_guidance-final_for_publication.pdf. Accessed 05/07/2022.