



Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects

The Applicant's Comments on the Local Impact Reports

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Glossary of Acronyms

AoD	Above Ordnance Datum
AONB	Area of Outstanding Natural Beauty
BDC	Broadland District Council
BNG	Biodiversity Net Gain
CIA	Cumulative Impact Assessment
CWS	County Wildlife Site
DCLG	Department for Communities and Local Government
DCO	Development Consent Order
dDCO	Draft Development Consent Order
DEFRA	Department for the Environment, Food and Rural Affairs
DEP	Dudgeon Extension Limited
DEP	Dudgeon Offshore Wind Farm Extension Project
DMPD	Development Management Policies Document
EAG	East Anglia Green
EIA	Environmental Impact Assessment
ES	Environmental Statement
ESC	East Suffolk Council
ETG	Expert Topic Group
ExA	Examining Authority
HDD	Horizontal Directional Drilling
HGV	Heavy Goods Vehicle
LIR	Local Impact Report
LLFA	Local Lead Flood Authority
LPA	Local Planning Authorities
LVIA	Landscape and Visual Impact Assessment
MCZ	Marine Conservation Zone
NALEP	New Anglia Local Enterprise Partnership
NBIS	Norfolk Biodiversity Information Service
NGET	National Grid Electricity Transmission
NNDC	North Norfolk District Council
NPPF	National Planning Policy Framework

NRMM	Non-Road Mobile Machinery
NSIP	Nationally Significant Infrastructure Project
OCTMP	Outline Construction Traffic Management Plan
OEMP	Outline Ecological Management Plan
OLMP	Outline Landscape Management Plan
PRoWs	Public Rights of Ways
SEL	Scira Extension Limited
SEP	Sheringham Shoal Offshore Wind Farm Extension Project
SNC	South Norfolk Council
SoCG	Statement of Common Ground
TPO	Tree preservation Order

Glossary of Terms

Dudgeon Offshore Wind Farm Extension Project (DEP)	The Dudgeon Offshore Wind Farm Extension onshore and offshore sites including all onshore and offshore infrastructure.
DEP offshore site	The Dudgeon Offshore Wind Farm Extension consisting of the DEP wind farm site, interlink cable corridors and offshore export cable corridor (up to mean high water springs).
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.
DEP North array area	The wind farm site area of the DEP offshore site located to the north of the existing Dudgeon Offshore Wind Farm
DEP South array area	The wind farm site area of the DEP offshore site located to the south of the existing Dudgeon Offshore Wind Farm
DEP wind farm site	The offshore area of DEP within which wind turbines, infield cables and offshore substation platform/s will be located and the adjacent Offshore Temporary Works Area. This is also the collective term for the DEP North and South array areas.
Expert Topic Group (ETG)	A forum for targeted engagement with regulators and interested stakeholders through the EPP.
Grid option	Mechanism by which SEP and DEP will connect to the existing electricity network. This may either be an integrated grid option providing transmission infrastructure which serves both of the wind farms, or a separated grid option, which allows SEP and DEP to transmit electricity entirely separately.
Horizontal directional drilling (HDD) zones	The areas within the onshore cable route which would house HDD entry or exit points.
Infield cables	Cables which link the wind turbine generators to the offshore substation platform(s).
Interlink cables	Cables linking two separate project areas. This can be cables linking: <ul style="list-style-type: none"> 1) DEP South array area and DEP North array area 2) DEP South array area and SEP

	<p>3) DEP North array area and SEP</p> <p>1 is relevant if DEP is constructed in isolation or first in a phased development.</p> <p>2 and 3 are relevant where both SEP and DEP are built.</p>
Interlink cable corridor	This is the area which will contain the interlink cables between offshore substation platform/s and the adjacent Offshore Temporary Works Area.
Integrated Grid Option	Transmission infrastructure which serves both extension projects.
Jointing bays	Underground structures constructed at regular intervals along the onshore cable route to join sections of cable and facilitate installation of the cables into the buried ducts.
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
Offshore cable corridors	This is the area which will contain the offshore export cables or interlink cables, including the adjacent Offshore Temporary Works Area.
Offshore export cable corridor	This is the area which will contain the offshore export cables between offshore substation platform/s and landfall, including the adjacent Offshore Temporary Works Area.
Offshore export cables	The cables which would bring electricity from the offshore substation platform(s) to the landfall. 220 – 230kV.
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.

Order Limits	The area subject to the application for development consent, including all permanent and temporary works for SEP and DEP.
Separated Grid Option	Transmission infrastructure which allows each project to transmit electricity entirely separately.
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 offshore site	Sheringham Shoal Offshore Wind Farm Extension consisting of the SEP wind farm site and offshore export cable corridor (up to mean high water springs).
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.
SEP wind farm site	The offshore area of SEP within which wind turbines, infield cables and offshore substation platform/s will be located and the adjacent Offshore Temporary Works 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. As requested by the Examining Authority (ExA), the following local authorities submitted Local Impact Reports (LIRs) at Deadline 2:
 - Broadland District Council [REP1-066];
 - East Suffolk Council [REP1-076];
 - Norfolk County Council [REP1-080];
 - North Norfolk District Council [REP1-082]; and
 - South Norfolk District Council [REP1-090].
2. Equinor New Energy Limited (the Applicant) has provided comments on the LIRs, which are presented in Table 1-1 to Table 1-5 below.

1.1 Broadland District Council

Table 1-1 Applicant's comments on Broadland District Council's Local Impact Report

ID	Local Impact Report Comment	Applicant's Response
Introduction		
1	<p>This Local Impact Report (LIR) has been prepared by Broadland District Council in accordance with the advice and requirements set out in the Planning Act 2008 (as amended) as, 'a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area)'.</p> <p>In preparing this LIR the local authority has had regard to the DCLG's Guidance for the examination of applications for development consent (2015) and the Planning Inspectorate's Advice Note One, Local Impact Reports (2012).</p> <p>The LIR relates only to the onshore elements and identifies the most relevant policies and the main issues the Council has concerns over.</p>	Noted. No further comment required.
Details of the proposal		
2	<p>The Application is for development consent to construct and operate two offshore wind farm generating stations, known as Sheringham Shoal Offshore Wind Farm Extension Project (SEP) and Dudgeon Offshore Wind Farm Extension Project (DEP), both located off the coast of Norfolk (together "the Projects"). SEP is the proposed extension to the operational Sheringham Shoal Offshore Wind Farm and will comprise up to 23 wind turbine generators, together with the associated onshore and offshore infrastructure. The offshore export cable corridor from SEP to landfall will be approximately 40km in length and the onshore cable corridor will be approximately 60km in length. DEP is the proposed extension to the operational Dudgeon Offshore Wind Farm and will comprise up to 30 wind turbine generators, together with the associated onshore and offshore infrastructure. The offshore export cable corridor from DEP to landfall will be approximately 62km in length and the onshore cable corridor will be approximately 60km in length.</p> <p>The project will make landfall at Weybourne, North Norfolk with a buried cable route between Weybourne and grid connection at Norwich Main National Grid</p>	Noted. No further comment required.

ID	Local Impact Report Comment	Applicant's Response
	Substation. The route will run through three Local Authorities North Norfolk, Broadland and South Norfolk.	
Relevant development proposals under consideration or granted permission but not commenced or completed		
3	<ul style="list-style-type: none"> • National Highways NSIP: A47 North Tuddenham to Easton – TRO10038, granted consent 22 June 2022 • Norfolk Boreas Off-Shore Windfarm – EN010087, Consent granted – 10 December 2021 • Norfolk Vanguard Off-Shore Windfarm – EN10079, Consent granted 11 February 2022 • Hornsea Three Off-Shore Wind Farm NSIP - EN010080, consent granted 31st December 2020 and discharge of requirements being submitted to LPA's • Land at Honingham, adjacent to Easton. Greater Norwich Food Enterprise Zone Local Development Order ref 20170052 • 20211249 & 20211288 Land North of The Street Cawston. Ground mounted solar farm including associated infrastructure. Approved with conditions. 	<p>The Applicant thanks Broadland District Council (BDC) for providing details of relevant development proposals under consideration or granted permission but not commenced or completed.</p> <p>The Applicant confirms the following projects were considered in the Environmental Statement (ES):</p> <ul style="list-style-type: none"> • A47 North Tuddenham to Easton – TRO10038, granted consent 22 June 2022 • Norfolk Boreas Off-Shore Windfarm – EN010087, Consent granted – 10 December 2021 • Norfolk Vanguard Off-Shore Windfarm – EN10079, Consent granted 11 February 2022 • Hornsea Three Off-Shore Wind Farm NSIP - EN010080, consent granted 31st December 2020 and discharge of requirements being submitted to Local Planning Authorities (LPA) <p>The Applicant is in discussions with the developers of the Food Enterprise Partnership and is aware of the Greater Norwich Food Enterprise Zone Local Development Order ref 20170052.</p> <p>The Applicant is aware of the planned solar farm development and that when the Local Planning Authority adopted it's Screening Opinion, it confirmed the proposed solar farm is not Environmental Impact Assessment (EIA) development as defined in the 2017 Regulations. Given the solar farm project is not EIA development, data is limited to allow a meaningful assessment, and as such has not been</p>

ID	Local Impact Report Comment	Applicant's Response
		<p>included in the Cumulative Impact Assessment (CIA). Although there is a potential spatial overlap between the two projects, it is understood the proposed solar farm will require minimal construction works and as such, it is not anticipated there will be any cumulative effects arising from interactions between the project and SEP & DEP. In addition, the DCO allows for trenchless techniques, e.g. Horizontal Directional Drilling (HDD) at this section of the cable corridor should the Solar Farm be constructed first.</p>
<p>Relevant development plan policies, supplementary planning guidance etc</p>		
4	<p>The following policies are considered relevant to the consideration of this application (relevant extracts of each policy are attached as Appendix 1). Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS) adopted in March 2011, amendments adopted January 2014. Policy 1: Addressing climate change and protecting environmental assets Policy 2: Promoting good design Broadland District Council Local Plan Development Management DPD (DM DPD), adopted August 2015. Policy GC4: Design Policy GC5: Renewable Energy Policy EN1: Biodiversity and Habitats Policy EN2: Landscape Policy EN3: Green Infrastructure Policy EN4: Pollution</p>	<p>Noted. No response required.</p>
<p>Relevant Issues: Heritage Assets</p>		

ID	Local Impact Report Comment	Applicant's Response
5	<p>Heritage issues arise from the underground cabling. This includes impacts on conservation areas and listed buildings which should be assessed in relation to policy EN2 of the DMPD and Section 16 of the NPPF.</p>	<p>The Applicant confirms that the impacts on Conservation Areas and Listed Buildings were assessed in relation to policy EN2 of the Development Management Policies Document (DMPD) and Section 16 of the National Planning Policy Framework (NPPF) in ES Chapter 21 Onshore Archaeology and Cultural Heritage [APP-107].</p>
6	<p>The Council note that para 107 of the applicants submissions states: "The assets identified above were found to either not share intervisibility or had limited intervisibility with the onshore substation and associated infrastructure and the offshore infrastructure. This was considered to have little to limited change on their setting, and due to their distance from the above ground onshore and offshore project infrastructure, no significant impacts to heritage setting (and associated importance) were identified and no further action is considered to be required."</p> <p>The Council agrees with this assessment.</p>	<p>The position of BDC is noted by the Applicant. No further comment is required.</p>
7	<p>In the Council's relevant representation, it raised that further clarification needed to be undertaken regarding the impact of the project on Honingham Hall Park which is a historic parkland and garden although not registered which is identified on Historic Environment record and can be considered a non-designated heritage asset.</p> <p>The applicant has acknowledged that the Park is a non-designated heritage asset and has responded to the Council advising that they are proposing a Trenchless route section of the cabling where the route crosses the historic parkland. The Council welcomes this approach.</p>	<p>The position of BDC is noted by the Applicant. No further comment is required.</p>
8	<p>The Examining Authority has in its questions, has asked the Council to set our position on the significance of Honingham Hall Park as a non-designated asset and the features that contribute to its significance and setting. Also, in accordance with the NPPF, set out the harms weighed against the public benefits. Whilst the Council has responded to the question separately, it considered that the comments should also form part of this report.</p>	<p>No response required.</p>

ID	Local Impact Report Comment	Applicant's Response
9	<p>The Council would comment as follows:</p> <p>Honingham Hall Park is the historic parkland created for and associated with Honingham Hall. The Park is identified on the HER (NH44183). The hall, which originally dates to 1607, was demolished in 1966 although the coach house and stable buildings remain and are listed (List UID: 1372666). The parkland is shown in 1797 Faden's historic map. Late C19 OS maps show areas of plantation within the parkland of the hall and the two areas which the cable will run through the linear feature "The Broadway" to the north and "Ringland Covert" further to the southeast. The areas associated with the hall in terms of ownership varies over time however these are clearly landscape features associated with the estate. From the 1880s OS map there is an approach drive to the hall from the Northeast – where there is a lodge, through the tree plantation. The Broadway feature is more of plantation planting to estate farmland and the lane to provide an edge to the estate land. A now demolished building called Breck Farmhouse was at the centre of a field system to the southeast of it where there are no planted field trees on the OS Map so this tree planted area is more peripheral to the estate. With the loss of the hall and estate and changes to the parkland character, these plantation areas are considered to have a low degree of heritage significance as non-designated heritage asset which are of local importance only.</p>	<p>The position of BDC is noted by the Applicant. No further comment is required.</p>
10	<p>The Council would comment as follows:</p> <p>With the loss of the hall, the division of the parkland and return to arable, the plantation areas are surviving remnants of historic estate management and parkland associated with the former hall within the surrounding landscape. When passing through the plantation area the cable will be tunnelled at a depth of 10m under the trees so they will not be affected. This is shown on sheet 12 document 6.2.4. In the short term there will be some minor harm from trench digging within the parkland fields which over time will revert back to the original appearance. Overall, therefore it is considered that there will be minor short term harmful impact which is low adverse and no long-term harmful impact to the heritage asset so the proposals are not considered to result in any harm in the long term and negligible harm in the EIA matrix. Paragraph 203 has been taken</p>	<p>The position of BDC is noted by the Applicant. No further comment is required.</p>

ID	Local Impact Report Comment	Applicant's Response
	into account and it is considered that there is no requirement to carry out a planning balance assessment.	
Landscape and visual impact		
11	The key landscape and visual impacts will result from the laying of underground cabling in respect of the removal/loss of hedgerows, trees and the impact on the landscape character and visual amenities of the area. Policies GC4 and EN2 of the DMDPD are relevant in the consideration of the proposal.	The Applicant confirms that landscape and visual matters relevant to policies GC4 and EN2 have been considered as part of the assessment of effects set out in ES Chapter 26 LVIA [APP-112].
12	Landscape and Visual Impact – The Council is satisfied that the work has been undertaken in accordance with the accepted industry guidance. Whilst there are some points of detail that may merit further scrutiny/debate, which is often the case when judgement is involved overall, generally we concur with the findings.	The position of BDC is noted by the Applicant, and reflects the agreement reached and recorded between BDC and the Applicant in the BDC's Statement of Common Ground (SoCG) [REP1-042]. No further response is required.
13	In respect of the impact of the cable route, the Arboricultural Survey Report survey identifies the trees and constraints within parts of the DCO boundary, but not all. The Council considers that the tree/hedge details for the whole corridor should be provided, this should also include veteran trees which maybe outside the corridor but could still be impacted. Although it is accepted that currently no veteran trees/ancient woodland are shown to be removed or impacted on, as stated above we still do not have a survey for the whole route. The only veterans/ancients which have been picked up are those which are recorded on the Ancient Woodland/tree Inventory. The Council know that there are many smaller ancient woodlands and veteran trees which are not recorded, so again in the absence of a full survey we cannot say categorically that none will be lost or harmed by the proposed development. This applies to trees within the DCO boundary as well as those outside but still within buffer zones.	The Applicant advises that an arboricultural desk-study covering the onshore cable corridor has been completed and is presented in ES Appendix 20.15 Arboricultural Survey Report [APP-228]. The objective of the desk-study was to identify known protected and high value trees such as those with a Tree Preservation Order (TPO), those in a Conservation Area and/or veteran and ancient trees. This desk-study was supplemented by ground level arboricultural surveys within the North Norfolk Area of Outstanding Natural Beauty (AONB) and the area around Norwich Main Substation. Both these areas were targeted due to the sensitivity of the landscape as a result of arboricultural impacts. It is worth noting that in addition to the arboricultural desk-study and targeted arboricultural surveys, aerial imagery was used to help refine the cable corridor route to avoid trees and woodland and ecological work including site surveys to identify trees with bat roost potential (which veteran and ancient trees often have) were undertaken. The information from the arboricultural desk-study, targeted arboricultural surveys, and ecological surveys was used in the site selection process to refine the cable route, minimising possible impacts to veteran and ancient trees from the outset through embedded mitigation (mitigation by design). Further arboricultural surveys will be undertaken prior to construction of the development. Requirement 11 (Provision of Landscaping) of the draft

ID	Local Impact Report Comment	Applicant's Response
		<p>DCO (Revision D) [document reference 3.1] which requires the Applicant to submit a written landscape management plan (which accords with the outline landscape management plan) for that phase for approval by the relevant planning authority. Each landscaping scheme must include details of existing trees and hedges to be removed and details of existing trees and hedges to be retained, with measures for their protection during the construction period where applicable. This would take the form of a full arboricultural assessment.</p> <p>Important hedgerows and potentially important hedgerows are shown in the Tree Preservation Order and Hedgerow Plan [APP-017], which also identifies which of those will also require removal. Details of potentially important hedgerows and important hedgerows to be removed within the Order Limits are listed in the draft DCO (Revision D) [document reference 3.1, Schedule 16]. The Article detailing the undertaker's powers to fell or lop trees and remove hedgerows is set out in the draft DCO (Revision D) [document reference 3.1, Article 34].</p> <p>Mitigation measures in relation to hedgerows are detailed in the ES Chapter 20 Onshore Ecology and Ornithology [APP-106. para. 262-265]. The proposed approach to reinstating hedgerows post-construction is detailed in the revised Outline Ecological Management Plan (OEMP) (Revision B) [document reference 9.19 , Section 4.1] and the Outline Landscape Management Plan (OLMP) (Revision B) [document reference 9.19, para. 25, para 38], which are secured by Requirement 13 (Ecological Management Plan) and Requirement 11 (Provision of Landscaping) of the draft DCO (Revision D) [document reference number 3.1].</p>
14	<p>Currently there is not an assessment in line with the 1997 Hedgerow Regulations, in the absence of the information in terms of the 'importance' of hedgerows under the Hedgerows Regulations and assessment of trees implicated in the scheme, it is not possible to conclude on the impacts of the cable route. Our local plan policy DM4.8 presumes in favour of retention of important hedgerows unless the need for, and benefits of, a development clearly outweigh their loss.</p>	<p>Important hedgerows and potentially important hedgerows are shown in the TPO and Hedgerow Plan [APP-017], which also identifies which of those will also require removal. Details of potentially important hedgerows and important hedgerows to be removed within the Order Limits are listed in the draft DCO (Revision D) [document reference 3.1, Schedule 16]. The Article detailing the undertaker's powers to fell or lop trees and</p>

ID	Local Impact Report Comment	Applicant's Response
15	The Council understands that any section of hedgerow that has to be removed as part of the cabling will be replanted, which does lessen the concern about potential loss of 'important' hedgerows (especially if their status is solely because of an historic line). However, we need to be clear as to when replanting may not be the possible, or when the 'importance' of a hedgerow cannot be safeguarded.	remove hedgerows is set out in the draft DCO (Revision D) [document reference 3.1, Article 34]. The Applicant has committed to replanting trees at a ratio of 1:1 outside the working easement and seeks to replace and enhance existing hedgerows as detailed in the OLMP (Revision B) [REP1-025] and OEMP (Revision B) [REP1-027].
16	From experience of other NSIPs in the Councils area, the Council would bring to the Examiners attention that the lack of a full survey's at the time of the assessment and consideration of the DCO has led to a greater loss of trees/hedges and woodlands at the Discharge of Requirements stage that had been accounted for during that determination. Not only has this put the Council in a difficult position wishing to protect its natural environment, but also has not enabled the full implications of the proposed development to be considered during the determination of the development, as it should be. Furthermore, the Council has had to deal with additional hedge/tree removal outside of the order limits to facilitate NSIP development, this makes it difficult to ensure adequate mitigation/compensation is provided.	Noted. Whilst the Applicant is sympathetic to the experience of BDC in relation to other Nationally Significant Infrastructure Projects (NSIP), the Applicant does not consider that those circumstances are relevant to the Examination of SEP and DEP. The Applicant refers to the responses at ID14 and ID15. The Applicant considers that the survey work carried out to date is appropriate and that suitable mitigation has been provided and secured.
17	It is also noted as above that the cable route is passing through Honingham Park and the loss of trees could have a harm on the Landscape Character of the parkland. The applicant has responded to the Council advising that they are proposing a Trenchless route section of the cabling where the route crosses the historic parkland. The Council welcomes this approach.	BDC's acceptance of the Applicant's approach is noted. No further response required.
Noise and Pollution		
18	The key noise and pollution considerations are the impacts of the construction of and the operation of the proposal on the amenities on local residential in respect of air quality, water quality, noise and vibration, light pollution etc. Policy GC4 and EN4 of the DMDPD are relevant to the consideration of the proposed development.	Acknowledged, no further comment required.
19	The Councils considers that the documentation would indicate that the proposal could take place (both the construction and operational phase) without an unacceptable impact on residents, if managed and operated appropriately.	Noted. no further comment required.

ID	Local Impact Report Comment	Applicant's Response
20	In view of the above, with regards to specified works to be undertaken issues relating to Control of Noise, Air Quality, Artificial Light, Waste Management, Pollution Prevention, Contamination Assessment and Mitigation and Working Hours are adequately covered by the Requirements in the Draft DCO. The Council is in general agreement and appreciates that the exact wording of the listed documentation/requirements will be subject to further discussion with the applicants.	Noted. no further comment required.
Ecology		
21	Policy 1 of the JCS requires the development to both have regard to and protect the biodiversity and ecological interests of the site and contribute to providing a multi-functional green infrastructure network. Policy EN1 of the DMDPD looks for new development sites to safeguard the ecological interests of the site and to contribute to ecological and Biodiversity enhancements.	Noted. no further comment required.
22	The Council considers that all developments should take all reasonable opportunities to enhance biodiversity to achieve a net gain for nature. To achieve this the application should adhere to the mitigation hierarchy (providing effective avoidance, minimisation and compensate measures) and deliver biodiversity net gains.	<p>The Applicant acknowledges BDC's comment and would like to signpost to the Outline Biodiversity Net Gain (BNG) Strategy [APP-306] and Initial BNG Assessment [APP-219]. In addition, the OLMP (Revision B) [REP1-025] includes information on Biodiversity Net Gain (BNG). These plans are secured by Requirements 13 (Ecological Management Plan) and 11 (Provision of Landscaping) of the draft DCO (Revision D) [document reference 3.1] respectively. Further to this, Requirement 12 (Implementation and Maintenance of Landscaping) of the draft DCO (Revision D) [document reference 3.1] requires the applicant to carry out landscaping in accordance with the plan approved in Requirement 11.</p> <p>The Applicant will consider opportunities to deliver BNG which could include forthcoming nature recovery strategies targeting new sites, features or habitats as priorities for enhancement.</p>
23	The scope for terrestrial ecological surveys has been previously agreed and surveys of 90% of the route were undertaken between 2020-2021 by suitably qualified and experienced ecologist in line with best practice guidelines. The Council would also encourage the applicant to update the desk top study as our County Wildlife Sites were recently updated.	The Applicant acknowledges BDC's comment Regarding County Wildlife Sites and has committed to completing an updated desk study including data search with the Norfolk Biodiversity Information Service (NBIS) to obtain up-to-date information on any CWSs within the Order Limits and surrounding 2km area, as confirmed within Table 2 of the OEMP (Revision B) (REP1-026).

ID	Local Impact Report Comment	Applicant's Response
		The Applicant acknowledges BDC's comment and will continue to explore further opportunities to avoid/minimise impacts in partnership with other schemes in the area.
24	The cable route has been designed to avoid impacts where possible and further micro-siting is expected at the detailed design. The Council would encourage the applicant to explore further opportunities to avoid/minimise impacts in partnership with other schemes in the area as the schemes develop and are delivered.	Noted. no further comment required.
25	The ES provides an outline for mitigation and the Council welcome the use of native species of local provenance and biodegradable tree guards. The proposed mitigation will be reviewed and adjusted as the design progresses. Consideration should be given to the use of moveable 'hedges' which could be placed within hedge gaps at night and removed the following day, to provide for continued connectivity. These have been proposed and will also be trailed by another linear scheme.	The Applicant will consider available mitigation options that avoid impacts on species such as bats). The precise scope of mitigation measures will be informed by the results of pre-construction surveys and (where available) on studies into the effectiveness of newly emerging mitigation techniques, such as moveable hedges.
26	Should reptile translocation be required, the translocation site will need to be identified, secured, and maintained for at least the lifetime of the scheme.	Noted. The only reptile site at which movement of reptiles may be necessary is Hickling Lane (near the onshore substation), where reptiles would be moved out of the construction footprint and into suitable adjacent habitat which is outside the construction footprint but still inside the Order Limits and part of the same unit of reptile habitat. In this respect, movement of reptiles would be micro-scale and within the same 'site', so translocation to different/distant sites is not proposed. The areas to which reptiles would be moved is known to be suitable for reptiles, it is within the Order Limits and is therefore secured for use by the Applicant.
27	The applicant is committed to deliver biodiversity net gain (BNG) and an Initial Biodiversity Net Gain Assessment has been undertaken. At the present time it is anticipated that the scheme will deliver a 0.50% net loss in habitats, and a 3.02% net gain in hedge units. Because it is not possible to offset the loss of habitat units against the gain in hedge units additional work will be required to deliver net habitat gains to ensure the scheme complies with National Planning Policy. With regards to the delivery of BNG we would encourage consideration of the Local Nature Recovery Strategy which should be published by November	As outlined within the Outline BNG Strategy [APP-306], the calculations at this stage account almost entirely for the habitat losses associated with the onshore elements of SEP & DEP, because these are broadly known and quantifiable. However, the majority of gains in the form of habitat creation are not yet confirmed (e.g. agreed with stakeholders) so cannot be included, hence the preliminary calculations show net losses for Habitats Units and Rivers and Streams Units. Once habitat

ID	Local Impact Report Comment	Applicant's Response
	<p>2023, and compliance with best practice guidelines to ensure that BNG is delivered post-construction.</p>	<p>enhancements are agreed with relevant stakeholders these will be incorporated into the BNG Metric calculations.</p> <p>It is acknowledged that BNG does not allow offsetting of losses from different Units types (Habitat Units cannot be equated/offset against Hedgerow Units, for example).</p> <p>The Local Nature Recovery Strategy will be reviewed and considered, once available as part of the BNG strategy and also ecological compensation and enhancement measures.</p>
28	<p>Letters of No Impediment (LoNI) have been received from Natural England for bats and badgers and great crested newts will be licenced under the District Level Licensing Scheme. No other licences are anticipated to be required based on the information obtained to date although additional ecological surveys will be undertaken on the remaining 10% of the route to inform the detailed design. In line with best practice Reasonable Avoidance Measures should be employed to minimise impacts on great crested newts and we would encourage the design of a wildlife friendly surface water drainage scheme, with Sustainable Urbans Drainage Systems designed for the benefit of wildlife.</p>	<p>The Applicant is committed to delivering best practice in relation to minimising impacts on great crested newts and will be delivering Reasonable Avoidance Measures that go beyond the requirements of the Natural England District Level Licence. Those Reasonable Avoidance Measures are listed in the updated OEMP(Revision B) [REP1-027, Section 2.3.7].</p>
29	<p>Again, as part of the Council's experience in Discharging Requirements, it is evident that the cabling routes have an impact that South Norfolk need to have regard to for Pink-footed Geese. This impact results from the grazing of the Pink-footed Geese on post-harvest cereal stubs, sugar beet tops etc. A Pink-footed Geese management plan will need to be a requirement of any consent which should set out a clear understanding of their impact and protection needs during the winter months when vegetation removal for the development is most likely to happen.</p>	<p>The Applicant has received the guidance from Natural England regarding pink footed geese and is developing a strategy accordingly and in consultation with Natural England.</p>
30	<p>Overall, following mitigation which will be secured via the DCO, the scheme is predicted to have negligible or minor adverse impacts on ecological receptors i.e. the impacts would have minimal effect at the lower end of the scale, but could adversely affect an ecological receptor but would not adversely affect the integrity or conservation status at the other end. The ES has addressed inter-relationships between ecology, water and air, noise, and vibration.</p>	<p>Noted. No further comment required.</p>
<p>Socio-economic and community matters</p>		

ID	Local Impact Report Comment	Applicant's Response
31	In general, the District Council is supportive of the project, recognising its importance in relation to the diversification of UK energy supplies; the contribution the projects will make to the achievement of the national renewable energy targets toward net zero; the reduction of the UK's reliance on imported energy and increased energy supply security; and potential contribution to the national and local economy.	Noted. No further comment required.
32	The economic benefits in terms of investment and job creation are welcomed.	Noted. No further comment required.
Consideration of the draft order		
33	With regards to the Draft Development Consent Order, the Council in general terms does not wish to raise any concerns, however as set out in our Statement of Common Ground and in response to the Examining Authority's questions there are issues and concerns relating to specific requirements/conditions. The Council wishes to reserve its position due to ongoing discussions with the applicant.	Noted. No further comment required.

1.2 East Suffolk Council

Table 1-2 Applicant's comments on East Suffolk Council's Local Impact Report

ID	Local Impact Report Comment	Applicant's Response
1	<p>East Suffolk Council (ESC) notes the Examining Authority's procedural decision in reference to Local Impact Reports (LIRs) being requested from host and neighbouring, lower and upper tier Local Authorities, in line with s60 and s56A of the Planning Act 2008, to be submitted by Monday 20 February 2023, which is Deadline 1 in the draft Examination timetable set out in the Rule 6 and 8 letters. The following table therefore provides a summary of the potential impacts relating to kittiwake compensation which reflects the points raised within our Relevant Representation (RR-030).</p>	<p>Noted.</p>
<p>ESC's Strategic Position on kittiwake compensation measures / issues associated with kittiwake nesting sites</p>		
2	<p>ESC supports gull conservation measures where these are appropriately sited with terrestrial planning considerations having been given sufficient weight in site selection. We will however oppose any such proposal in proximity to heavily populated, sensitive, or urban areas (such as within the Town of Lowestoft for example) in order to minimise any human interaction with nesting kittiwakes and to avoid further exacerbating the existing issues associated with nesting sites such as noise, smell and mess.</p>	<p>As noted by the Applicant in its response to East Suffolk Council's Relevant Representation [RR-030], modifications to the existing kittiwake tower at Gateshead represents the Applicant's preferred option for delivering nest site improvements to enhance breeding success. The Applicant recognises that there is strong opposition from East Suffolk Council for project-led delivery of nest site improvements to enhance kittiwake breeding success within Lowestoft town as it would be contrary to their strategic position. Whilst it remains the Applicant's view that its proposal for Lowestoft has strong ecological merit and is technically feasible, in light of East Suffolk Council's view and recognising the positive progress being made with respect to securing the option at Gateshead (see the Habitats Regulations Assessment Derogation and Compensatory Measures Update [REP1-061] note which includes a letter of support from Gateshead Council in Appendix B), the decision has been taken to not actively progress the option at Lowestoft further at this stage.</p>
3	<p>The introduction of additional nesting capacity at existing sites in the Town will effectively burden the Council and the owners of the buildings on which the birds nest, with significant and ongoing cleaning and maintenance requirements which is something we will not be able to sustain. The Environmental Protection team already receive complaints each year due to nesting gulls in the town and such complaints cost time and money to investigate and rectify. Adding additional nesting capacity in the central urban areas of Lowestoft is not supported by ESC as this would only add to the natural growth of the existing kittiwake population in an area already experiencing human bird conflict.</p>	
4	<p>ESC's strategic position seeks to avoid proliferation of artificial nesting structures within our District, particularly around sensitive areas. Experience indicates that compensation proposals for kittiwake artificial nesting aims to be located in proximity to existing colonies of kittiwakes and this results in hot</p>	

ID	Local Impact Report Comment	Applicant's Response
	spots within the East Suffolk District where different developers seek to explore similar requirements in similar locations, exacerbating existing issues.	
5	<p>To clarify ESC's preferences on kittiwake compensation measures in numerical order:</p> <p>1 – compensation provided elsewhere out of district avoiding existing conflicts and local sensitivities;</p> <p>2 – if provision is sought within ESC, Applicants will be required to coordinate provision reducing local impacts associated with human / bird conflicts (i.e. relating to noise, smell, mess, hygiene concerns and visual appearance at nest sites);</p> <p>3 – only once preference 1 and 2 have been fully exhausted will a new bespoke project alone solution be considered, however this will require planning input for site selection and constraint mapping from the initial stages with no guarantees of local planning authority support should such provision be deemed to exacerbate existing issues.</p>	
Coordination requirement		
6	<p>ESC is concerned that DCO compensation requirements to address impacts on seabirds, particularly kittiwakes, are not being considered strategically, both geographically and across different projects. This is of particular concern given the expected quantity of projects coming forward in our coastal areas over the next decade to meet the Government's ambitions. The uncoordinated approach to the delivery of artificial nests in this region could lead to a significant oversupply which will never be filled by increases in colony sizes. Requirements for these structures have previously been imposed on developers in the latter stages of the development consent process with no tangible benefits being offered at that time to the local coastal communities set to host them.</p> <p>Any proposal for artificial nesting within East Suffolk will therefore be required to demonstrate that every opportunity for coordination with other projects has been fully explored before any new (or enhanced capacity at existing sites) will be considered or supported by the Council. Other developers with similar compensation requirements have been steered away from within the Town of</p>	<p>The Applicant has considered compensatory measures in the context of different delivery models including strategic, collaborative and project-led measures. The delivery models reflect how the Applicant considers each measure could be most feasibly, effectively and proportionately delivered, relative to the Projects' predicted impacts.</p> <p>Prey enhancement through sandeel stock recovery and ecosystem-based management is considered by the Applicant to be the most effective means of increasing breeding success and therefore populations of Sandwich tern, kittiwake, guillemot and razorbill. This is evidenced by information presented in Annex 1B Sandwich Tern and Kittiwake Ecological Evidence [APP-066]. However, as outlined in the respective species compensation documents and the Strategic and Collaborative Approaches to Compensation and Measures of Equivalent Environmental Benefit [APP-084], this would necessitate, for example, a decision by Department for the Environment, Food and Rural Affairs (DEFRA) to legislate to reduce fishing pressure on sandeels in UK waters as strategic compensation for</p>

ID	Local Impact Report Comment	Applicant's Response
	<p>Lowestoft due to the existing issues associated with human/bird conflict at nesting sites.</p> <p>ESC has recently had to engage at a post-consent stage with several other offshore wind promoters who have received DCOs for their projects but are seeking kittiwake compensation in East Suffolk. Having not been engaged on this matter for other projects during the examinations, this has proven to be very challenging and puts significant additional pressure on council resources.</p> <p>East Suffolk Council is keen to work with project promoters in finding an acceptable solution to kittiwake compensation, however we will continue to raise significant concerns regarding the siting of additional artificial nesting in urban settings. We will work with project promoters who are willing to explore coordination with other promoters at suitable locations away from these areas or appropriately located in the nearshore environment where potential terrestrial planning constraints (including seascape visual impacts) are found to be more manageable in the right location. Developer costs should not restrict opportunities for coordination and ESC will be taking a consistent approach with all project promoters seeking such compensation requirements within our District.</p>	<p>offshore wind, for which there is currently no agreed mechanism for delivery and which may not be achievable within the necessary timeframes for SEP and DEP. Given the huge potential of such an action to provide far greater compensation than even the most precautionary estimates of losses incurred due to SEP and DEP and offshore wind in total, prey enhancement is included as a key part of the Applicant's proposals for Sandwich tern, kittiwake, guillemot and razorbill compensation, but as a measure that could only be delivered strategically.</p> <p>In light of recent amendments to the Energy Security Bill (in response to the UK Government's British Energy Security Strategy and Offshore Wind Environmental Improvement Package), an option for the Applicant to pay a financial contribution to a Strategic Compensation Fund (such as the Marine Recovery Fund) as an alternative to project-led measures or as an adaptive management measure has been included within the Draft DCO (Revision D) [document reference 3.1]. It is anticipated that such a fund would provide an optional delivery mechanism for developers to participate in delivering strategic compensatory measures approved by Government (BEIS, 2023). If the Marine Recovery Fund became available in the anticipated timescale of late 2023, then it is possible that the Applicant would be able to utilise the fund within the existing timetable for delivery of SEP and DEP.</p> <p>With respect to measures which the Applicant aims to take forward (if required) on a purely collaborative basis i.e. construction of new artificial breeding sites for kittiwake onshore or offshore, these measures present an opportunity for collaboration which seeks to capitalise on existing learning and suitable locations (where these are limited) to either co-locate measures or deliver a single measure which can compensate for the predicted impacts of multiple projects. However, measures considered in the context of the collaborative delivery model do not currently form a component of the package of compensatory measures proposed for SEP and DEP but rather represent alternative options that may become available to the Applicant in the near future. It has been necessary to adopt this approach as discussions with other developers on the nature of an appropriate delivery mechanism for collaborative delivery are not yet sufficiently matured for the Applicant to rely upon these measures. However, discussions with other offshore wind</p>

ID	Local Impact Report Comment	Applicant's Response
		<p>developers are ongoing, and the Applicant will continue to explore the potential for collaborative delivery of these measures with prospective partners and other relevant stakeholders.</p> <p>Further details are set out in the Strategic and Collaborative Approaches to Compensation and Measures of Equivalent Environmental Benefit [APP-084] and the Habitats Regulations Assessment Derogation and Compensatory Measures Update [REP1-061].</p> <p>Regarding project-led delivery of kittiwake compensation see the Applicant's response at ID 2 of this table. Should there be a need to revisit options for kittiwake compensation at a later stage (for example, in the unlikely event that the nest site improvements to enhance breeding success in Gateshead cannot be secured or are not entirely successful), the Applicant will re-examine its proposal for Lowestoft and any collaborative or strategic opportunities, in consultation with Natural England and other relevant stakeholders, to determine the most appropriate course of action.</p>

1.3 Norfolk County Council

Table 1-3 Applicant's comments on Norfolk County Council's Local Impact Report

ID	Local Impact Report Comment	Applicant's Response
Introduction		
1	This report sets out Norfolk County Council's position with regard to the submitted Development Consent Order (DCO) application made under section 56 of the Planning Act (2008).	Noted. No comment required.
2	<p>The County Council is a statutory consultee as the proposed development is a Nationally Significant Infrastructure Project (NSIP) under the above Act and is located both:</p> <ul style="list-style-type: none"> • Adjacent to the County – offshore Wind Farm located in the North Sea (see Appendix 1.1); and • Within the County with regard to the supporting onshore grid connection infrastructure (see Appendix 1.2). 	Noted. No comment required.
3	<p>The principal role of the County Council in responding to the above wind farm and ancillary onshore infrastructure application, is in respect of the Authority's statutory role as:</p> <ul style="list-style-type: none"> • Highways Authority; • Minerals and Waste Planning Authority; • Lead Local Flood Authority; and • Public Health responsibilities. 	Noted. No comment required.
4	In addition, the County Council has an advisory environmental role and economic development function, which has also fed into the response to the DCO application.	Noted. No comment required.
5	The issues and impacts described/raised below only relate the County Council's statutory and advisory functions.	Noted. No comment required.
Summary of the Proposal		

ID	Local Impact Report Comment	Applicant's Response
6	<p>The original Sheringham Shoal Windfarm was completed in 2012 (88 wind turbines with an energy generating capacity of 317MW), and the original Dudgeon offshore windfarm was completed in 2017 (67 wind turbines with an energy generating capacity of 402 megawatt (MW)).</p>	<p>Noted. No comment required.</p>
7	<p>The Sheringham Extension Project (SEP) and the Dudgeon Extension Project (DEP) are located in the Greater Wash region of the southern North Sea. The closest point to the coast is 15.8 km from SEP and 26.5 km from DEP, see offshore location map in Appendix 1.1.</p>	<p>Noted. No comment required.</p>
8	<p>The SEP and DEP would see up to 23 additional turbines for the SEP and up to 30 additional turbines for the DEP. The SEP and DEP would double the energy generating capacity of the existing offshore windfarms. The offshore cables would make landfall at Weybourne (west of Weybourne Beach car park), on the North Norfolk Coast. The SEP and DEP would have a shared grid connection point at the Norwich Main substation.</p>	<p>Noted. No comment required.</p>
9	<p>The impacts of this proposal on Norfolk are largely as a result of the onshore permanent and temporary infrastructure which is required as a result of the projects. The infrastructure required in Norfolk includes:</p> <ul style="list-style-type: none"> • Landfall and associated transition joint bay/s at Weybourne • Onshore export cables installed underground from the landfall to the onshore substation and associated joint bays and link boxes (approx. 60 km) • Onshore substation and onward 400 kilovolt (kV) connection to the existing Norwich Main substation, two options: • 3.25ha in size for SEP or DEP alone or 6ha total for SEP and DEP together, under both scenarios the substations would be 15m in height maximum • Trenchless crossing zones (e.g., Horizontal Directional Drilling (HDD)) e.g., under roads etc • Construction and operational accesses • Temporary construction compounds. 	<p>Noted. No comment required.</p>

ID	Local Impact Report Comment	Applicant's Response
10	<p>As set out in the applicant's application there are three construction scenarios:</p> <ul style="list-style-type: none"> • Isolated construction with either the SEP or DEP being constructed in isolation • Sequential construction with the SEP or DEP being constructed in a phased approach; and • Concurrent construction with the SEP and DEP being constructed at the same time. <p>The County Council continues to favour the integrated approach to the construction of the two windfarm extension projects rather than a separate approach, to minimise the impact of the construction of the projects on Norfolk County Council infrastructure and the population of the County.</p>	Noted. No comment required.
Background		
11	<p>The County Council responded to the pre-application Preliminary Environmental Information Report (PEIR) (Section 42) consultation of this proposal in June 2021. At that time the County Council's Planning and Highways Delegations Committee broadly supported the proposal subject to a number of detailed matters being resolved (see Appendix 2). The County Council was subsequently consulted on an amendment to the Section 42 on the Targeted Consultation on SEP and DEP selection of the main compound site the County Council's comments to this additional consultation are set out in Appendix 3.</p>	Noted. No comment required.
12	<p>There are still a number of on-going issues and concerns regarding the projects, and these are set out in the section below (Section 4) in respect to the DCO application.</p>	Noted. No comment required.
Local Impacts on Norfolk - Assessment		
13	<p>In relation to the previous comments submitted to the Section 42 consultation the County Council raised the following points (June 2021 – see Appendix 2):</p>	Noted. No comment required.

ID	Local Impact Report Comment	Applicant's Response
	<ul style="list-style-type: none"> • The principle of the project is supported; • Consideration of feeding electricity into local transmission networks to facilitate planning housing and employment growth; • A requirement for an Employment and Skills Strategy; • Compensation for those affected by the cumulative impacts of construction, including local businesses and fishermen; • Concern over the cumulative impacts of the SEP and DEP projects being developed separately; • Concern over the onshore cable route, requiring this route to not fetter the highway improvement schemes in Norfolk, including the Norwich Western Link and A47 improvement schemes; • Historic Environment Team requiring additional geophysical surveys. 	
14	<p>The following points were raised from the main construction compound consultation in February 2022 (see Appendix 3):</p> <ul style="list-style-type: none"> • The County Council supported the location of the main construction compound being at the greenfield site at Attleborough (A1067 Fakenham Road); • The Lead Local Flood Authority required the applicant to consider surface water drainage issues at the main compound site; • The Natural Environment team required a 10m stand-off between the compound and the trees to the southeast of the site. 	Noted. No comment required.
15	<p>The above comments have largely been positively considered and addressed by the applicant at the submission stage or will be addressed through on-going DCO process. The following comments in section 4 below have been made to the submitted DCO and endorsed by the County Council's Planning and Highways Delegations Committee on 26 October 2022, there have been no amendments to the County Council's response to this application since the S56 consultation paragraphs 4.4-4.11. The comments below, reiterate the</p>	Noted. No comment required.

ID	Local Impact Report Comment	Applicant's Response
	County Councils response to the S56 consultation. Paragraphs 4.12-5.7 provides clarification on the County Councils position on the DCO.	
Grid Connection and Electricity Supply		
16	<p>The SEP and the DEP projects will feed directly into the National Grid at Norwich Main. The submitted DCOs do not extend beyond the onshore cable routes and grid connection infrastructure at Norwich Main. There are separate proposals by National Grid to reinforce the electricity transmission network (400 kV overhead power lines) between Norwich Main substation and Tilbury substation in Essex, known as the East Anglia Green (EAG) Project. This project, which is still at the pre-application stage, is needed according to the National Grid to increase capacity into the existing network to cater for additional electricity generated principally from the offshore wind energy sector.</p>	<p>The following response was provided in the 12.4 The Applicant's Responses to the Examining Authority's First Written Questions [REP1-036].</p> <p>The Applicant's conclusion, based on National Grid Electricity Transmission's (NGET) public statements, is that the need for the East Anglia Green (EAG) project is not triggered by the connection of SEP and DEP to the Norwich Main substation, but rather by significant expected growth in both generation and demand in the area and the need for reinforcement. The Scoping Report for EAG does make reference to the dependency of specified offshore wind farms (Five Estuaries and North Falls) on its development, but these do not include SEP and DEP.</p> <p>The grid connection offer for SEP and DEP that was signed in 2019 is not conditional upon the delivery of the EAG project.</p> <p>The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033], in response to Norfolk County Council's Relevant Representation [RR-064].</p> <p>The EAG Project is separate from SEP and DEP and is being promoted by National Grid.</p> <p>The Applicant advises that the EAG Energy Enablement (GREEN) Scoping Opinion was published on the Planning Inspectorate website 14/12/22, post the submission of the SEP and DEP DCO application. At the time of the SEP and DEP DCO application, East Anglia Green was a Tier 3 development (as defined in Section 5.8, ES Chapter 5 EIA Methodology [APP-091]). As such, the Applicant considered there to be insufficient information to assess cumulative environmental effects with SEP and DEP (The Planning Inspectorate, 2019). The Applicant considers that EAG would be in a more suitable position to assess cumulative effects with SEP and DEP, which as a Tier 1 development, has a higher degree of certainty.</p>

ID	Local Impact Report Comment	Applicant's Response
17	<p>The County Council in responding to the non-statutory consultation on the East Anglia Green (EAG) project (June 2022) indicated, inter alia:</p> <p>“Any new electricity infrastructure needs to benefit Norfolk as whole and be capable of supplying existing and planned growth in housing and employment (commercial development).”</p>	<p>Noted. No comment required.</p>
18	<p>The County Council is in continued discussions with National Grid and UK Power Networks (Distribution Network Operator) to look into the potential to feed electricity into the local transmission networks as part of the EAG project, which will be taken forward through the NSIP process in 2023.</p>	<p>Noted. No comment required.</p>
19	<p>Equinor, the Planning Inspectorate (PINS), and the Secretary of State need to be aware of these on-going issues regarding the need for improved access to new electricity infrastructure to support the planned housing and employment growth across the County; and recognise the need for joined-up/collaborative approach between the various infrastructure providers (i.e., Equinor; National Grid and UK Power Networks) to deliver power where it is needed in Norfolk.</p>	<p>The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033], in response to Norfolk County Council's Relevant Representation [RR-064].</p> <p>Whilst the infrastructure proposed will enable the generation of much needed renewable energy, National Grid is responsible for the onward transmission infrastructure. However, the Applicant understands that there are feeder connections at Norwich Main which supply the local area with power and SEP and DEP will therefore support security of supply within the local area.</p>
Socio-Economic		
20	<p>Equinor have indicated through their economic modelling that their two projects could create up to 2,190 UK jobs and £124.5 million gross value added (GVA) per annum during construction. They estimate that 450 of these jobs would be in East Anglia and £23.7 million GVA generated in the Region annually assuming an East Anglia construction port is used. A further 230 jobs will be generated once operational of which 85 would be within East Anglia.</p>	<p>Noted and agreed.</p>
21	<p>As previously commented the economic benefits of the above projects are welcomed and officers are working with Equinor to develop an Employment and Skills Strategy. The County Council would wish to see the applicant develop through the development consent order (DCO) process a strategy to accompany the development and secure demonstrable benefits to both the local economy and workforce. Such a Strategy would need to be agreed with</p>	<p>The comment is noted. The Applicant understands that the reference to be to The Employment and Skills Plan rather than an Employment and Skills Strategy. The Employment and Skills Plan will be the main strategic document for securing local economic and labour market benefits, and will be agreed with the County Council, The Norfolk Chambers of Commerce (as the author of the new Norfolk Skills Improvement Plan) District Councils and the New Anglia Local Enterprise Partnership (NALEP).</p>

ID	Local Impact Report Comment	Applicant's Response
	both the County Council and the District Councils affected, along with the New Anglia Local Enterprise Partnership.	
22	The County Council would also like to see a local community benefit fund set up outside the planning process, as is being undertaken by other offshore windfarm promoters, designed to support / assist those wider communities affected by the projects.	<p>The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033], in response to Norfolk County Council's Relevant Representation [RR-064].</p> <p>The Applicant notes the comment in respect of community benefits and is keen to continue to work with the local community to deliver benefits to the area. As noted within the Project Background section of the Outline Skills and Employment Plan [APP-310], the Applicant is a long-term partner in Norfolk and the East of England and has been an active member of the community for over a decade through its Sheringham Shoal and Dudgeon Offshore Wind Farms that it operates off the Norfolk coast (para. 5). Both existing wind farms have established community funds. Each fund allocates £100,000 of funds per year to Norfolk community groups including schools and non-governmental organisations seeking financial assistance for projects or initiatives that focus on renewable energy, marine environment and safety, sustainability or education (para. 7).</p>
Highways		
23	Detailed discussions and negotiations will remain on-going throughout the DCO application process, particularly in respect of any temporary road closures; construction traffic management plans (CTMPs); and other travel related planning. Notwithstanding these ongoing discussions, officers have assessed the impact of construction traffic on receptors along 140 roads (over 300 miles of road network) including consideration of pedestrian delay, road safety, driver delay and abnormal (large) deliveries.	<p>The Applicant refers to the responses provided in the Applicant's Comments on Relevant Representations [REP1-033], in response to Norfolk County Council's Relevant Representation [RR-064].</p> <p>The Applicant has had productive discussions with NCC Highways and is now in agreement on all but one matter. The Applicant has submitted changes at Deadline 1 including an updated Outline Construction Traffic Management Plan (OCTMP) (Revision B) [REP1-021] which should serve to address this matter. An updated Statement of Common Ground will be submitted at Deadline 3, by which time is anticipated that agreement on all matters will be reached.</p>
24	Resulting from the above, mitigation measures will be needed including reducing construction vehicle numbers on certain routes and the use of escort vehicles and/or provision of passing places along narrow roads. An Outline Traffic Management Plan (OTMP) will be submitted as part of the DCO and then completed when the contractor is appointed. The final mitigation will be agreed with the contractor.	

ID	Local Impact Report Comment	Applicant's Response
25	<p>A cumulative impact assessment has also been undertaken to assess impacts with other significant projects, notably other offshore windfarms and highways schemes (e.g., widening / dualling of the A47 between Easton to North Tuddenham). Roads that could be utilised by the other projects have been identified. Officers are satisfied that the potential for cumulative impacts can be managed through the respective projects' CTMPs.</p>	
26	<p>The County Council's highway officers are still carefully assessing the supporting documentation in respect of the above matters and will make appropriate comments under delegated officer powers and feed these back to PINS within the prescribed consultation period. This may include, where appropriate:</p> <p>(a) Raising any necessary holding highway objection in the event that highway safety is deemed to be compromised; and/or</p> <p>(b) Seeking Planning Conditions (Requirements) to be attached to the DCO in order to overcome any highway issue.</p>	
Lead Local Flood Authority		
27	<p>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 Lead Local Flood Authority (LLFA) to review.</p>	<p>The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033] , in response to Norfolk County Council's Relevant Representation [RR-064].</p> <p>The Applicant wrote to the ExA, on 13 January 2023 as the Notification of the Applicant's intention to submit requests for changes [AS-036], to advise of its intent to make a non-material change to the DCO.</p> <p>The Applicant confirmed that a single preferred solution for surface water drainage from the Onshore Substation has been selected, comprising a shallow infiltration solution. The change application will remove the option to drain into the to the foul sewer.</p> <p>The following supporting documents to the DCO are being updated and</p>

ID	Local Impact Report Comment	Applicant's Response
		<p>will be submitted at Deadline 2 as part of the change request application:</p> <ul style="list-style-type: none"> • Annex 18.2.1: Onshore Substation Drainage Study (Revision B) [document reference 6.3.18.2.1]; and • Outline Operational Drainage Strategy (onshore substation) (Revision B) [document reference 9.20] (formally referred to as the Outline Operational Drainage Plan (onshore substation)) [APP-307].
28	<p>At this stage, the County Council as the LLFA has considered the outline surface water drainage design as set out in the Outline Operational Drainage Plan; as well as the Flood Risk Assessment (FRA); Onshore Sub-station Drainage Study; and accompanying Hydraulic Modelling. At this time, further evidence and clarification of information is required to demonstrate:</p> <p>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.</p> <ul style="list-style-type: none"> • There is a lack of confirmation of where the surface water drainage proposals for the onshore sub-station 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. • The hydraulic modelling on which the FRA, which influences the proposed development design, and its associated drainage design requires updating and clarification. 	<p>The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033], in response to Norfolk County Council's Relevant Representation [RR-064].</p> <p>In addition to the response provided above, the Applicant notes that during ETG meeting 7 with the Local Lead Flood Authority (LLFA) on 06/12/2022, the discussion included consideration of the required updates to the hydraulic modelling.</p> <p>The results of this will be included within the updated supporting documentation listed below, which will be submitted at Deadline 2:</p> <ul style="list-style-type: none"> • Annex 18.2.2: Onshore Substation Hydraulic Modelling Report (Revision B) [document reference 6.3.18.2.2] (formally referred to as Annex 18.2.2: Onshore Substation Hydraulic Modelling Technical Note) [APP-211]; and • Addendum to the Flood Risk Assessment (Revision A) [document reference 12.61].
29	<p>As such the LLFA has a holding objection to the onshore elements of this proposal.</p>	<p>Norfolk County Council's position is noted by the Applicant, and no further response is required.</p>
30	<p>Reason</p>	<p>Norfolk County Council's position is noted by the Applicant, and no further response is required.</p>

ID	Local Impact Report Comment	Applicant's Response
	<p>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 ensuring the sustainable drainage systems proposed operates as designed for the lifetime of the development.</p>	
31	<p>The LLFA would remove its holding objection if the following issues are adequately addressed:</p> <ol style="list-style-type: none"> 1. An updated FRA and Drainage Strategy that confirms the proposed surface water discharge location for the onshore sub-station. 2. The provision of a sustainable surface water drainage design details for the proposed for the Onshore Sub-Station with support calculations and plans. 3. The provision of the site-specific greenfield runoff rates and volumes, the comparable post-development runoff rate and volumes. 4. An updated hydraulic model that appropriately applies the latest climate change allowances and provides an assessment of the change is flood risk. 5. Adequate consideration of the surface water flood risk associated with discharging to the foul sewer in Swainsthorpe and the residual risks. 6. 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. 	<p>The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033], in response to Norfolk County Council's Relevant Representation [RR-064].</p> <p>Once the non-material change application is made, and SEP and DEP will progress solely with the option to use shallow infiltration drainage at the Onshore Substation, it is understood that points 5 and 6 will be resolved.</p> <p>In response to items 1, 2, 3 and 4, the change request application will be supported by updated information, to be submitted at Deadline 2, including:</p> <ul style="list-style-type: none"> • Outline Operational Drainage Strategy (onshore substation) (Revision B) [document reference 9.20] (formally referred to as the Outline Operational Drainage Plan (onshore substation)) [APP-307]; and • Annex 18.2.2: Onshore Substation Hydraulic Modelling Report (Revision B) [document reference 6.3.18.2.2] (formally referred to as the Annex 18.2.2: Onshore Substation Hydraulic Modelling Technical Note) [APP-211].
32	<p>The LLFA may need to make further detailed comments on the above matters as part of the Examination process and through submission of the County Council's LIR; and if appropriate an agreed emergency flood plan for the for the onshore sub-station (construction and operation), landfall site (construction only) and the onshore cable route (construction only).</p>	<p>Norfolk County Council's position is noted by the Applicant, and no further response is required.</p>
<p>LLFA Comments on Flood Risk Assessment (FRA)</p>		

ID	Local Impact Report Comment	Applicant's Response
33	<p>Informative:</p> <ul style="list-style-type: none"> The Norfolk Local Flood Risk Management Strategy was updated in 2021 with an addendum. The Norfolk LLFA Statutory Consultee for Planning Guidance Document has been updated in 2022 (currently version 6) to take into account some of the recent National Planning Policy Framework (NPPF) updates and the Climate Change guidance updates. The Planning Practice Guidance (PPG) for Flood risk and Coastal Change was updated in August 2022. <p>These updates are not fully reflected in the FRA such as those in the PPG update. The LLFA has considered the impact these changes could have and has only provided comments relating to the proposed scheme where there is a potential moderate to significant impact.</p>	<p>The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033], in response to Norfolk County Council's Relevant Representation [RR-064].</p> <p>The Applicant notes the references to updated policy and guidance documents. These will be considered in the relevant supporting documents to the DCO which are being updated, where necessary, and will be submitted at Deadline 2. This will include the Addendum to the Flood Risk Assessment (Revision A) [document reference 12.61].</p> <p>In addition, a technical note responding to the PPG for Flood Risk and Coastal Change update [REP1-062] has been prepared by the Applicant and was submitted at Deadline 1 to accompany the Applicants response to Written Questions 1.</p>
34	<p>The FRA based on the Drainage Study identified the two most feasible surface water drainage options were either discharge to the Anglian Water Sewer in Swainsthorpe or to discharge to infiltration. However, no conclusion as to which option was preferred was reached in either the FRA or the Drainage Strategy. The LLFA acknowledges that while neither of these solutions are preferable, the options available at this location are very limited and constrained.</p>	<p>The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033], in response to Norfolk County Council's Relevant Representation [RR-064] and should be considered alongside the response to ID 27 above.</p> <p>The Applicant wrote to the ExA (Examining Authority), on 13 January 2023 as the Notification of the Applicant's intention to submit requests for changes [AS-036], to advise of its intent to make a non-material change to the DCO.</p> <p>The Applicant confirmed that a single preferred solution for surface water drainage from the Onshore Substation has been selected, comprising a shallow infiltration solution. The change application will remove the option to drain into the to the foul sewer.</p> <p>The following supporting documents to the DCO are being updated and will be submitted at Deadline 2 as part of the change request application:</p> <ul style="list-style-type: none"> Annex 18.2.1: Onshore Substation Drainage Study (Revision B) [document reference 6.3.18.2.1]; and

ID	Local Impact Report Comment	Applicant's Response
		<ul style="list-style-type: none"> • Outline Operational Drainage Strategy (onshore substation) (Revision B) [document reference 9.20] (formally referred to as the Outline Operational Drainage Plan (onshore substation)) [APP-307].
35	<p>In Plates 2 to 5 (pages 69-72), the LLFA notes the surface water hydraulic modelling results are not consistent with the latest national guidance for climate change allowances. The LLFA requires for this modelling to be updated to incorporate the latest climate change allowances.</p>	<p>The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033], in response to Norfolk County Council's Relevant Representation [RR-064].</p> <p>The Applicant notes that during Expert Topic Group (ETG) meeting 7 with the LLFA on 06/12/2022, 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.</p> <p>This has been included within the updated modelling and is summarised in the supporting documentation comprising Annex 18.2.2: Onshore Substation Hydraulic Modelling Report (Revision B) [document reference 6.3.18.2.2], to be submitted at Deadline 2, (formally referred to as Annex 18.2.2: Onshore Substation Hydraulic Modelling Technical Note) [APP-211].</p>
36	<p>In section 18.2.8.1.4, Para 455-456 (pages 72-73) the applicant should ensure staff and users also sign up for Met Office Weather warnings too, as some areas of surface water flood risk in Norfolk do not coincide with the Environment Agency Flood warning areas.</p>	<p>The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033], in response to Norfolk County Council's Relevant Representation [RR-064].</p> <p>Paragraph 463 of Appendix 18.2 - Flood Risk Assessment [AS-023] states that "...large parts of the onshore cable corridor are in rural undeveloped areas that are not covered by flood warnings. Furthermore, it is important to note that Environment Agency flood alerts and warnings are not issued in response to surface water flooding."</p> <p>Paragraph 464 and 465 of Appendix 18.2 – Flood Risk Assessment [AS-023] states that "As such the flood warning and evacuation plan will include independent checks (i.e. Met Office Weather Warnings) alongside any alerts or warnings issued by the Environment Agency. These checks will also account for risks outside of the alerts / warnings in areas that may be at risk</p>

ID	Local Impact Report Comment	Applicant's Response
		<p>from failure of defences (such as a breach). This will enable contractors and site managers to consider how this information will affect planned works, especially areas in close proximity to key watercourses.</p> <p>During construction, contractors and management should liaise with Norfolk County Council, as the LLFA, and the Environment Agency so they are aware of any forecast related to heavy rainfall events. The potential for flooding can then be assessed to enable work to stop, especially in areas in close proximity to key watercourses, and the site cleared of all personnel in this instance.”</p> <p>On this basis, the Applicant can confirm this has already been taken into consideration within the assessment undertaken. This is also reflected in Section 6.1.8 Flood Warning and Evacuation of the Outline Code of Construction Practice (Revision B) [REP1-023] secured under Requirement 19 of the draft DCO (Revision D) [document reference 3.1]</p>
37	<p>In section 18.2.8.1.4 (pages 72-73) where a Flood Plan is required, it should be reviewed and agreed with the Relevant Resilience and Emergency Planning teams in accordance with NPPF Para 167.</p>	<p>The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033], in response to Norfolk County Council's Relevant Representation [RR-064].</p> <p>The need for a Flood Plan is highlighted in Appendix 18.2 – Flood Risk Assessment [AS-023] and Table 1-1 of the Outline Code of Construction Practice (Revision B) [REP1-023]. It is also considered in Section 6.1.8 Flood Warning and Evacuation of the Outline Code of Construction Practice (Revision B) [REP1-023], secured under Requirement 19 of the draft DCO (Revision D) [document reference 3.1].</p>
38	<p>In the hydraulic modelling report, the hydraulic modelling must be updated for the 1% and 3.3% future scenarios in accordance with the latest climate change allowance guidance.</p>	<p>The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033], in response to Norfolk County Council's Relevant Representation [RR-064].</p> <p>The Applicant notes that during ETG meeting 7 with the LLFA on 06/12/2022, the discussion included consideration of appropriate climate change allowances to apply. It was agreed, with the LLFA, that in the</p>

ID	Local Impact Report Comment	Applicant's Response
		<p>absence of information related to the Decommissioning Phase an allowance of 45% for climate change would be applied.</p> <p>This has been included within the updated modelling and is summarised in the supporting documentation comprising Annex 18.2.2: Onshore Substation Hydraulic Modelling Report (Revision B) [document reference 6.3.18.2.2], to be submitted at Deadline 2, (formally referred to as Annex 18.2.2: Onshore Substation Hydraulic Modelling Technical Note) [APP-211].</p>
39	<p>In relation to the hydraulic modelling, confirmation of either the finished ground level that was used in "Option 1" and "Option 2" for the platform or whether the existing ground levels were proposed to be used as it was not provided in the report.</p>	<p>The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033], in response to Norfolk County Council's Relevant Representation [RR-064].</p> <p>The Applicant can confirm that the existing ground level has been utilised in the Option 1 scenario modelling. This will be summarised in Section 9.1 of Annex 18.2.2: Onshore Substation Hydraulic Modelling Report (Revision B) [document reference 6.3.18.2.2] (to be submitted at Deadline 2). The focus of the assessment at that time was to understand the potential interaction with the surface water flood extent to aid in further design iterations.</p> <p>The initial assessment of Option 2 also utilises the existing ground levels to continue to assess the potential interaction with the surface water flood extent. This will be set out in Section 9.2 of Annex 18.2.2: Onshore Substation Hydraulic Modelling Report (Revision B) [document reference 6.3.18.2.2] (to be submitted at Deadline 2).</p>
40	<p>The LLFA requests clarification in relation to hydraulic modelling of "Option 2 with Embankments" on whether the footprint of the platform was extended to account for the slope of the embankment, along with clarification of the height of the embankments.</p>	<p>The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033], in response to Norfolk County Council's Relevant Representation [RR-064].</p> <p>Section 9.3 and Figure 9-12 of Annex 18.2.2: Onshore Substation Hydraulic Modelling Report (Revision B) [document reference 6.3.18.2.2] (Option 2 with Embankments) confirms that the modelled footprint for the Onshore Substation platform includes the cut and fill areas for the</p>

ID	Local Impact Report Comment	Applicant's Response
		<p>embankments based on the cut and fill drawing. In this scenario the existing ground levels continue to be utilised to assess the potential interaction with the surface water flood extent.</p> <p>Option 2 with Embankments and Platform Level at 28.23m Above Ordnance Datum (AOD) (Section 9.5 of Annex 18.2.2: Onshore Substation Hydraulic Modelling Report (Revision B) [document reference 6.3.18.2.2] includes the platform as a non-permeable feature, at a level of 28.23m AOD, to understand the potential impact the Onshore Substation platform would have on the displacement of flood water.</p> <p>Annex 18.2.2: Onshore Substation Hydraulic Modelling Report (Revision B) [document reference 6.3.18.2.2] will be submitted at Deadline 2.</p>
41	<p>The LLFA requires that the applicant provides confirmation of the change in flood risk through a series of figures depicting the areas where a change in maximum flood depth and extent are experienced between the baseline and the post development scenario.</p>	<p>The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033], in response to Norfolk County Council's Relevant Representation [RR-064].</p> <p>A new section has been provided within Annex 18.2.2: Onshore Substation Hydraulic Modelling Report (Revision B) [document reference 6.3.18.2.2], including the addition of depth and flood extent difference figures. This compares the Baseline scenario with the Option 2 with Embankments and NW Access Road scenario for the 1 in 100 year (plus 45% allowance for climate change) event.</p> <p>Annex 18.2.2: Onshore Substation Hydraulic Modelling Report (Revision B) [document reference 6.3.18.2.2] will be submitted at Deadline 2.</p>
<p>LLFA Comments on 9.17 Outline Code of Construction Practice, Section 6</p>		
42	<p>6.1.8, para 118-119 (pages 33-34) the applicant should ensure that staff and users also sign up for Met Office Weather warnings too as some areas of surface water flood risk in Norfolk do not coincide with the Environment Agency Flood warning areas.</p>	<p>See response to ID 36 above.</p>

ID	Local Impact Report Comment	Applicant's Response
43	6.1.8, para 120 (page 34) should a Flood Plan be required, the applicant should ensure that it is reviewed and agreed with the Relevant Resilience and Emergency Planning teams in accordance with NPPF Para 167.	<p>The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033], in response to Norfolk County Council's Relevant Representation [RR-064].</p> <p>The need for a Flood Plan is highlighted in Appendix 18.2 - Flood Risk Assessment [AS-023] and Table 1-1 of the Outline Code of Construction Practice (Revision B) [REP1-023]. It is also considered in Section 6.1.8 Flood Warning and Evacuation of the Outline Code of Construction Practice (Revision B) [REP1-033].</p> <p>The requirement to engage with the relevant authorities in the production of the Code of Construction Practice is set out in Requirement 19 of the draft DCO (Revision D) [document reference 3.1]</p>
LLFA Comments on Appendix 18.2 - Annex 18.2.1: Onshore Substation Drainage Study		
44	The Drainage Study identified the two most feasible options were either discharge to the Anglian Water Sewer in Swainsthorpe or deep bore infiltration. However, no conclusion of which options was preferred was reached in the study.	See response to ID 27 above.
Natural Environment - Arboriculture		
45	An Arboricultural Survey Report - Volume 3, Appendix 20.15 (Wild Frontier Ecology, September 2022) along with the ecology reports provided by Wild Frontier Ecology have provided an overview to inform the DCO application and have been referenced to refine the proposed cable route.	Noted. No comment required.
46	From an arboriculture perspective the County Council is satisfied that the correct procedures have been followed to inform the design and construction of the onshore cable route and associated access routes and infrastructure to reduce the impact on significant trees and woodland as far as practically possible.	Noted. No comment required.
47	Advice on possible arboricultural impacts, mitigation and compensation options has been provided in Table 4 and elaborated in Sections 6.2-6.5 of the Arboricultural Survey Report; however, the report has not provided a full tree survey of the DCO boundary but has looked initially at the Area of Outstanding	The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033], in response to Norfolk County Council's Relevant Representation [RR-064].

ID	Local Impact Report Comment	Applicant's Response
	<p>Natural Beauty (AONB) and the Norwich Main substation and provided a desk study for the remaining cable route.</p> <p>A full tree survey and Arboricultural Impact Assessment of trees within the DCO boundary, including trees within 15m of the boundary, will be required prior to work on the onshore cables commencing. This will ensure that tree protection measures are secured through Tree Protection Plans and an Arboricultural Method Statement.</p> <p>A full tree survey will also highlight any additional veteran and ancient trees to allow consultation with an arboriculturist to devise suitable mitigation measures such as horizontal directional drilling and ensure that entry and exit pits for trenchless crossings are at least 15m from the stems of any retained trees and outside prescribed veteran tree buffer zones.</p>	<p>An arboricultural desk study covering the onshore cable corridor has been completed [APP-228]. The objective of the desk study is to identify known protected and high value trees such as those with a TPO in a Conservation Area and veteran/ancient trees. This desk study was supplemented by ground level arboricultural surveys within the North Norfolk AONB and the area around Norwich Main Substation. Both these areas were targeted due to the sensitivity of the landscape due to arboricultural impacts. It is worth noting that in addition to the desk study and targeted ground level survey, the ecology work included ground work to identify trees with bat roost potential (which veteran and ancient trees often have) and the information from all these studies was used in the site selection process to refine the cable route, minimising possible impacts to veteran and ancient trees from the outset. Further arboricultural surveys will be undertaken prior to construction of the development. This is secured by Requirement 11 (Provision of Landscaping) of the draft DCO (Revision D) [document reference 3.1] which requires the Applicant to submit a written landscape management plan (which accords with the outline landscape management plan) for that phase has been submitted to, and approved by, the relevant planning authority. Each landscaping scheme must include details of existing trees and hedges to be removed and details of existing trees and hedges to be retained, with measures for their protection during the construction period where applicable.</p>
48	<p>Post DCO consent, once the extent of tree and habitat loss are quantified, an appropriate detailed landscape scheme must be submitted as stated in the Outline Landscape Management Plan. This should take account of Biodiversity Net Gain as per the submitted documents Appendix 9.19.2 - Outline Biodiversity Net Gain Strategy and Environmental Statement (ES) Appendix 20.6 - Initial Biodiversity Net Gain Assessment Report (document reference 6.1.20.6).</p>	<p>The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033], in response to Norfolk County Council's Relevant Representation [RR-064].</p> <p>An appropriate detailed landscape scheme will be submitted post DCO consent, as stated at paragraph 41 of the OLMP (Revision B) (OLMP) [REP1-025], which will accord with the principles set out in the illustrative landscape proposals presented within the OLMP at Appendix 1: Illustrative landscape Proposals for the Onshore Substation. BNG is secured in Ecological Management Plan (Requirement 13 of the draft DCO (Revision D) [document reference 3.1]).</p>
<p>Natural Environment - Ecology</p>		

ID	Local Impact Report Comment	Applicant's Response
49	<p>It should be noted that our response is necessarily limited in extent, due to the role that Norfolk County Council has in relation to Nationally Significant Infrastructure Projects (NSIP's), with the relevant District Council(s) expected to have a more significant input, for example due to their role regarding the agreement and enforcement of planning requirements. Comments below refer to onshore ecology only.</p>	<p>Noted. No comment required.</p>
50	<p>Having reviewed Chapter 20 (Onshore Ecology & Ornithology) of the environmental statement, the County Council is satisfied it has been informed by adequate habitat and species surveys and data analysis. The ecological mitigation hierarchy appears to have been adhered to, with the embedded mitigation (as summarised in the Schedule of Mitigation & Mitigation Route map Document Ref. 6.5) welcomed. However, it is important to note that additional mitigation measures (as identified in Table 1: Offshore Mitigation Measures and Table 2: Onshore Mitigation Measures) will be required to be secured via DCO requirements. Of particular note is the DCO Schedule 2, Part 1, Requirement 13 for an Ecological Management Plan (EMP).</p>	<p>Noted. The mitigation measures as identified in the Schedule of Mitigation and Mitigation Route Map [APP-282, Table 1 and Table 2] have been collated from respective ES chapters and are secured via the DCO. Mitigation relevant to ecology is captured within the OEMP (Revision B) [REP1-027] and the Outline Code of Construction Practice (Revision B) [REP1-023] which are secured by Requirements 13 and 19 of the draft DCO (Revision D) [document reference 3.1].</p>
51	<p>The Outline EMP (Ref. 9.19) appears fit for purpose, noting however, that a Final EMP (DCO requirement 13) will be required to be submitted and should include details of all updated and pre-commencement surveys as necessary. The submission of an associated Construction Environmental Management Plan (CEMP) will also be required to be submitted.</p>	<p>The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033], in response to Norfolk County Council's Relevant Representation [RR-064].</p> <p>Note that a Code of Construction Practice (rather than a CEMP) will be submitted to secure construction environmental mitigation measures. Please see the Outline Code of Construction Practice (Revision B) [REP1-023]. This is secured by Requirement 19 (Code of Construction Practice) of the draft DCO (Revision D) [document reference 3.1] which states '<i>No phase of the onshore works may commence until a code of construction practice (which must accord with the outline code of construction practice) for that phase has been submitted to and approved by the relevant planning authority following consultation with Norfolk County Council, the Environment Agency, relevant statutory nature conservation bodies and, if applicable, the MMO</i>'.</p>

ID	Local Impact Report Comment	Applicant's Response
52	<p>Regarding the Outline Code of Construction Practice (Ref. 9.17) (Requirement 19 of the Draft DCO), it should be noted that a range of detailed environmental management plans will be required to be produced as set out in Table 1-1, including for example, a Dust Management Plan, Invasive Non-native Species Management Plan and Artificial Light Emissions Management and Mitigation Plan.</p>	<p>The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033], in response to Norfolk County Council's Relevant Representation [RR-064].</p> <p>These are set out within the Outline Code of Construction Practice (Revision B) [REP1-023], which will be secured by Requirement 19 (Code of Construction Practice) of the draft DCO (Revision D) [document reference 3.1]).</p>
53	<p>The Outline Biodiversity Net Gain (BNG) Strategy (Ref. 9.19.2) has been informed by an Initial BNG Assessment (ES Appendix 6.3.20.6). The Strategy states that the applicant has committed to deliver a positive BNG for the project, which is welcomed, however, although while not yet mandatory under the Environment Act for NSIP's, the achievement of a minimum 10% BNG figure is strongly encouraged.</p>	<p>The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033], in response to Norfolk County Council's Relevant Representation [RR-064].</p> <p>The Outline BNG Strategy [APP-306] and Initial BNG Assessment (APP-219) states:</p> <ul style="list-style-type: none"> • The target for SEP and DEP is to achieve the maximum feasible biodiversity net gain. No specific target is set [APP-306, para. 15] because of the extensive uncertainties involved (e.g. with landowners). However, pending landowner agreements, gains are considered feasible [APP-219, p7, para. 4]. • The Environment Act 2021 is due to set the minimum threshold at 10%, but this does not currently apply to NSIPs such as SEP and DEP [APP-306 para. 11-12]. • Although there is no legal requirement to provide BNG, SEP and DEP are committed to do so through the OEMP, which is secured by Requirement 13 (Outline Ecological Management Plan) of the draft DCO (Revision D) [document reference 3.1]. • BNG is not a legal requirement yet – it is expected to become law for NSIPs in 2025 [APP-306, para. 77]. As SEP and DEP are NSIPs they are going beyond the current requirements by providing a BNG assessment.

ID	Local Impact Report Comment	Applicant's Response
54	<p>It is of concern to note that the Initial BNG Assessment indicates a net loss of 0.5% Habitat Units and a net loss of 0.98 River Units, with only the Hedgerow Units currently indicating a positive gain of 3.02% (as per Table 4 Summary of Biodiversity Metric).</p>	<p>The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033], in response to Norfolk County Council's Relevant Representation [RR-064].</p> <p>As outlined within the Outline BNG Strategy [APP-219], the calculations at this stage account almost entirely for the habitat losses associated with the onshore elements of SEP & DEP, because these are broadly known and quantifiable. However, the majority of gains in the form of habitat creation are not yet confirmed (e.g. agreed with stakeholders) so cannot be included, hence the preliminary calculations show net losses for Habitats Units and Rivers and Streams Units.</p> <p>The Applicant notes the respondents comment and would like to reiterate that the DCO-stage BNG documents are the first step in the iterative BNG calculation process (Initial BNG Assessment [APP-219, para. 3]). The initial calculations are not the final calculations.</p> <p>Identifying post-development enhancements in the level of detail necessary to inform accurate BNG calculations can only be done following consultation with landowners and others to agree particular enhancements. This can only be done pre-construction, once precise construction details are finalised (Initial BNG Assessment [APP-219, paragraph 3]).</p>
55	<p>It is noted that only 90% of the area has been assessed to date, and that the BNG calculations will require updating as the construction parameters and detailed restoration proposals are finalised.</p>	<p>The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033] [document reference 12.3], in response to Norfolk County Council's Relevant Representation [RR-064].</p> <p>The Applicant notes that baseline habitat surveys covered c.90% of the area of the Order Limits; 10% was not surveyed due to landowner access restrictions (Initial BNG Assessment [APP-219, para. 2]). However, the remaining 10% will be surveyed pre-construction and the information factored into the updated BNG calculations [APP-306, para. 2]. From the desk study data obtained for these un-surveyed areas, they appear to be predominantly arable habitat and equivalent to the rest of the Order Limits [APP-219, para. 1]; therefore, incorporating these new areas is not expected to substantially alter the calculations.</p>

ID	Local Impact Report Comment	Applicant's Response
56	The Strategy states that BNG opportunities are to be developed further with stakeholder's post consent, with detailed and refined calculations provided on the final design. Norfolk County Council's Natural Environment Team would welcome the opportunity to engage in this process.	Noted, and the Applicant looks forward to further engagement on Biodiversity Net Gain following the completion of detailed design, post-consent.
57	There does not appear to be a requirement in the current Draft DCO to secure the submission of a BNG Strategy and therefore it is recommended that further consideration is given to its specific inclusion in the DCO.	<p>The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033] , in response to Norfolk County Council's Relevant Representation [RR-064].</p> <p>The BNG Strategy is referenced in the OEMP (Revision B) [REP1-027] secured by Requirement 11 (Provision of Landscaping) and Requirement 13 (Ecological Management Plan) respectively in the draft DCO (Revision D) [document reference 3.1].</p>
58	The Outline Landscape Management Plan (LMP) (Ref.9.18) (Requirement 11 of the Draft DCO) is a key document to facilitate the delivery of BNG targets and should therefore be developed with this in mind. Opportunities to enhance and create suitable habitats should be sought at every opportunity as the final version of the LMP is further refined.	<p>The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033] , in response to Norfolk County Council's Relevant Representation [RR-064].</p> <p>The BNG Strategy is referenced in the OLMP (Revision B) [REP1-025] secured by Requirement 11 (Provision of Landscaping) of the draft DCO (Revision D) [document reference 3.1].</p>
Natural Environment - Landscape		
59	These comments are limited in nature due to Norfolk County Council's remit within the process. Detailed comments on Landscape and Visual, Planting and Landscape Plans should be sought from the relevant district councils.	The Applicant is currently engaging with North Norfolk District Council (NNDL), South Norfolk Council (SNC) and BDC and preparing Statements of Common Ground with each of the District Councils.
60	Chapter 26 – Landscape and Visual Impact Assessment (LVIA) The County Council is satisfied that the methodology for the LVIA follows industry standard guidance and practices and is fit for purpose. Suitably data sources have been used for the desk top study aspects of the assessment and the viewpoints selected have been done so in coordination with relevant parties. It is noted that the LVIA is based on a “mitigation by design” approach and therefore there are no further measures proposed for mitigation. There are some long-term effects that will remain even once planting has established, that are therefore	Noted. No comment required.

ID	Local Impact Report Comment	Applicant's Response
	residual. Detailed views on these residual effects should be sought from District officers, however the County Council is willing to be part of any ongoing discussions.	
Historic Environment Service		
61	The Historic Environment Service has been in regular communication with the applicant of this scheme for about three years and have had detailed discussions with them through expert topic group meetings.	Noted. No comment required.
62	In broad terms the documents relating to the below-ground archaeology and undesignated heritage assets to be submitted with the DCO application reflect what we have agreed with the applicant and in line with our expectations.	Noted. No comment required.
63	<p>Chiefly though not exclusively these documents consist of.</p> <ul style="list-style-type: none"> • An archaeological desk-based assessment • An aerial photographic, LiDAR Data and Historic Map analysis • Archaeological geophysical survey report, priority areas • Report and assessment of Archaeological and Geoarchaeological Monitoring of site investigation works <p>The Historic Environment Services has no comments on the above documents.</p>	Noted. No comment required.
64	The applicant has largely followed our advice to use windows within the agricultural cycle to carry further geophysical survey prior to and in tandem with the NSIP DCO application process.	Noted. No comment required.
65	<p>It is noted that the Outline Onshore Written Scheme of Investigation (Ref. 9.21) has also been included in the documentation. The Historic environment Services' comments are as follows:</p> <p>Paragraph 77, third bullet point. The Historic Environment Service has moved away from the use of the term 'strip, map and sample excavations' as this can create the false impression of faster and less rigorous piece of work when compared to a 'set-piece (open-area) excavation'. We would like to see the</p>	<p>The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033], in response to Norfolk County Council's Relevant Representation [RR-064].</p> <p>The bullet points under Section 1.4 have been updated to reflect the mitigation approaches detailed in Section 7 of the Outline Written</p>

ID	Local Impact Report Comment	Applicant's Response
	term 'excavation' used for large scale mitigation taking place both prior to and during the construction programme.	Scheme of Investigation (Onshore) (Revision B) [REP1-029] which refers to 'Archaeological Excavation' as the mitigation approach in areas where impacts to archaeology are unavoidable.
Minerals and Waste		
66	Norfolk County Council in its capacity as the Mineral and Waste Planning Authority has been involved in discussions with the applicant of the SEP and DEP; regarding mineral and waste safeguarding, both of sites and resources. Throughout the project preparation information has been exchanged between the parties regarding these safeguarding issues. The Mineral Planning Authority considers that the Environmental Report for the SEP and DEP correctly assesses the magnitude, sensitivity and significance of the effect of the projects on Mineral Safeguarding Areas within section 17.6.1.4. The further mitigation suggested in section 17.6.1.4.5 is considered likely to be effective. Therefore, Norfolk County Council in its capacity as the Mineral Planning Authority does not object to the proposed SEP/DEP provided that the proposer constructs the cable corridor in the manner set out in the Preliminary Environmental Information Report and continues to work with Norfolk County Council regarding the mitigation of impacts on the Mineral Safeguarding Areas.	Noted. No comment required.
67	The Mineral and Waste Planning Authority will continue ongoing discussions with the applicant as required and will ensure that any future issues are resolved through the Local Impact Report and through the DCO process.	Noted. The Applicant looks forward to continuing to work with NCC.
Public Health		
68	Public Health's comments are limited to Chapter 28 of the Environmental Statement on health. Public Health has previously discussed the health impact assessment methodology used to assess the impacts of the project on human health with the applicant and welcomes its usage. We believe the assessment methodology for the Health Impact Assessment is appropriate and based on best practice. Public Health agrees that there are unlikely to be any significant, long term adverse health impacts from the proposal compared to baseline conditions.	The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033], in response to Norfolk County Council's Relevant Representation [RR-064]. The Applicant thanks Public Health Norfolk County Council for the clear and concise comments regarding Chapter 28 of the Environmental Statement on health [APP-114]. The ETG meeting with Public Health Norfolk County Council was very useful. The Applicant is pleased that there is agreement that the Health Impact Assessment is appropriate and based on best

ID	Local Impact Report Comment	Applicant's Response
		<p>practice and that there are unlikely to be any significant, long term adverse health impacts from the proposal compared to baseline conditions.</p>
69	<p>Public health would like the applicant to include further mitigation measures to address any adverse impacts on mental health, especially given the potential length of construction works. The applicant should increase the involvement of local communities to plan for how disruption of the natural environment and its impacts on mental health can be minimised; how current levels of physical activity can be maintained and improved through provision of information around alternative undisturbed routes on land, how any perceived or real water pollution at sea will be managed; and how information on electromagnetic fields are communicated to the public to reduce the stress, uncertainty, and associated mental health impacts in clear and non-technical ways.</p>	<p>The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033], in response to Norfolk County Council's Relevant Representation [RR-064].</p> <p>The Applicant notes the request, in row 69, to 'include further mitigation measures to address any adverse impacts on mental health', especially with regards to the potential length of construction works. There are a number of points made in row 69 of the Norfolk County Council Relevant Representation and the Applicant's reply is presented below.</p> <p>In row 68 above, Public Health Norfolk County Council notes how its comments are limited to ES Chapter 28 Health [APP-114]. APP-114 refers to other project documents so the Applicant sets out the mitigation measures against each of the issues raised by NCC below. These cover the whole Project and are provided in the Schedule of Mitigation and Mitigation Routemap [APP-282].</p> <p>Commitments are in place to ensure that local communities are able to contribute to the planning of the Project and, when necessary, to raise complaints. The Outline Code of Construction Practice (Revision B) [REP1-023], secured by Requirement 19 of the draft DCO will include a Stakeholder Communications Plan to ensure effective and open communication with local residents and businesses that may be affected by the construction works (para 26). The Outline Project Environmental Management Plan [APP-297], sets out requirements for regular environmental meetings and debriefs local to the site where representatives from the Project Team, the Principal Contractor, and key sub-contractors will consider matters such as the status of outstanding items, reports of environmental incidents or complaints and stakeholder engagement (para 68).</p> <p>With regards to complaints, the Outline Code of Construction Practice (Revision B) [REP1-023] specifies that a Local Community Liaison Officer will respond to any public concerns, queries or complaints in a professional and diligent manner as set out by a project community and public relations</p>

ID	Local Impact Report Comment	Applicant's Response
		<p>procedure which will be submitted for comment to the relevant planning authority (paragraph 27); and the Outline Project Environmental Management Plan (Revision B) [REP1-017] states that the final Project Environmental Management Plan will detail the procedure in place to report public complaints in relation to offshore works (paragraph 72).</p> <p>The Applicant recognises that these are subtly different requests, but the response is provided as one because the mitigation to reduce the disruption of the local environment is the same as mitigation to maintain current levels of physical activity. While direct links with mental health are rarely made in APP-282 there are provisions to ensure liaison that will contribute to reducing stress and anxiety associated with the construction programme: liaison with Norfolk County Council about proposed construction works on Public Rights of Way (measure 19.13); community liaison through the Outline Code of Construction Practice (Revision B) (Revision B) [REP1-023 paragraph 26] and the Outline Project Environmental Management Plan (Revision B) [REP1-17, paragraph 71] as noted above; procedures for addressing community complaints, as noted above, through the Outline Code of Construction Practice (Revision B) [REP1-023, paragraph 27] and the Outline Project Environmental Management Plan (Revision B) [REP1-017, paragraph 72]. This is in addition to commitments to reduce disruption from air quality, noise, traffic and visual impacts [APP-282, measure 19.4].</p> <p>Paragraph 255 of APP-114 sets out additional recommended mitigation measures to help minimise the risk of any change in behaviour.</p> <p>ES Chapter 7 Marine Water and Sediment Quality [APP-093] and corresponding mitigation measures are set out in measures 7.1 to 17.6 of Schedule of Mitigation and Mitigation Routemap (APP-282). These include commitments to minimise deterioration to water quality across all construction and operation processes. Table 7-21 of APP-093 shows that the potential residual impacts during construction, operation and decommissioning phases of SEP and DEP are considered to be negligible (paragraph 177). APP-093 also notes that, given the outcomes of the assessment, no monitoring specifically targeting marine sediment and water quality parameters is proposed and that this is agreed by Natural England</p>

ID	Local Impact Report Comment	Applicant's Response
		<p>(paragraph 176). An Offshore In Principle Monitoring Plan (IPMP) (APP-289) is provided.</p> <p>The measures above address 'real' water pollution at sea. Public Health Norfolk County Council also asks about 'perceived' water pollution at sea. This will be picked up through the liaison and complaint mechanisms described above (as set out in the Outline Project Environmental Management Plan (Revision B) [REP1-017] and the Outline Code of Construction Practice (Revision B) [REP1-023].</p> <p>There are no explicit plans to communicate information on electromagnetic fields (EMF) to the public. If required this can be addressed through the provisions for community liaison through the Outline Code of Construction Practice (Revision B) [REP1-023, paragraph 26] and the Outline Project Environmental Management Plan (Revision B) [REP1-017, paragraph 71] as noted above; and the procedures for addressing community complaints, as noted above, through the Outline Code of Construction Practice (Revision B) [REP1-023, paragraph 27] and the Outline PEMP (Revision B) [REP1-017, paragraph 72].</p> <p>EMF is assessed in APP-279.</p> <p>With regards to the offshore environment, the Executive Summary [APP-279] states that there are no formal limits for EMF exposure in the marine environment. The SEP and DEP offshore export circuits mitigate the impacts of EMF on marine life by burial techniques which reduce the fields, and the projects use armoured cables for mechanical protection, which additionally act to reduce the EMFs produced. The use of single 3-core cables, compacting the circuit phases also reduces and localises the EMFs significantly. The mitigation techniques employed by the project should be sufficient to reduce the impacts of EMF on marine life, although more in-depth analysis may be required to quantify specific impacts to certain species (see also APP-282, measure 9.1).</p> <p>With regards to the onshore environment, the Executive Summary [APP-279] states that calculations demonstrate the maximum magnetic fields from any of the options considered were 9% of the current exposure limits set, by</p>

ID	Local Impact Report Comment	Applicant's Response
		<p>the UK Government, to protect members of the public against EMF exposure.</p>
70	<p>Public Health has the following specific comments:</p> <ul style="list-style-type: none"> • There is evidence to suggest that cold related deaths are unlikely to significantly decrease due to a warming climate • Paragraph 128 does not consider changing working patterns with increased numbers of people working from home • Impacts of air quality should include adverse impacts on pregnant women in paragraph 185 as there is evidence that poor air quality adversely impacts birth weight • Paragraph 186 states the key health outcomes affected by air quality are cardiovascular diseases and asthma. Lung cancer and type 2 diabetes are also key health outcomes related to air quality. • Any potential contamination of water quality during construction (paragraph 216) may impact physical activity behaviours even if works are conducted out of season • Health outcomes related to reduced physical activity (paragraph 231) should include type 2 diabetes, unhealthy BMI, stroke and musculoskeletal conditions 	<p>The following response was provided in the Applicant's Comments on Relevant Representations [REP1-033] , in response to Norfolk County Council's Relevant Representation [RR-064].</p> <p>Cold-related deaths: It is not possible to respond to the bullet point about cold-related deaths in detail as it is not clear what evidence is being referred to. Paragraph 119 of the ES chapter on human health [APP-114] presents a statement from the Socio-Economic chapter [APP-113] regarding the impact of a changing climate on the health of the population. This states that effects from heat-related illness would be partially offset by a reduced risk of cold weather-related illness during winter. The Applicant notes that paragraph 119 of APP-114 refers to cold-related illness and not deaths. The predicted effects on health infrastructure are reported in the Socio-Economic chapter [APP-113]: paragraph 207 finds the magnitude of effect to be negligible within the context of the East Anglia study area because while there will be some disruption to local social and community infrastructure, including some added pressure on local health infrastructure, the overall level of disruption is anticipated to be minimal. Paragraph 209 [APP-113] goes on to say that as the sensitivity of the receptor is assessed as medium and the magnitude of effect is assessed as negligible, the significance of impact of SEP and DEP is therefore assessed as minor adverse which is not considered to be significant in EIA terms.</p> <p>Changing working patterns: Paragraph 128 of APP-114 shows variation along the onshore cable corridor in the numbers of households with no adults in employment, one person in the household with a long-term problem or disability, people aged over 65 and retired people. These are taken as proxy for the time people spend at home during the day. The population profile, in APP-280, uses data from the 2011 census. Results from the 2021 census data were released post DCO submission. The conclusion, in paragraph 128 of AP-114, stands that near landfall and along the onshore cable corridor, a slightly higher proportion of people in general spend extended periods at home and that near the onshore substation people</p>

ID	Local Impact Report Comment	Applicant's Response
		<p>generally spend less (or approximately the same amount of) time at home than at the local, regional or national level.</p> <p>Air quality and pregnant women: Paragraph 185 of APP-114 lists the population groups that may be especially vulnerable to changes in air quality. Norfolk County Council notes that pregnant women should be included in this list as there is evidence that poor air quality adversely impacts birth weight. This is a fair comment. This inclusion does not change the findings of APP-114 with regards to air quality.</p> <p>APP-114 looks at health effects arising from changes to air quality in relation to dust and fine particulate from construction activities and emissions from construction vehicles and non-road mobile machinery (NRMM) (paragraph 184).</p> <p>In paragraph 198 the conclusion of the assessment for population health is given for air quality. It states that any change due to SEP and DEP will be a low magnitude of effect on a receptor of medium to high sensitivity. This represents an impact of minor adverse significance, i.e., not significant for the general population or vulnerable groups. Paragraph 198 goes on to list the vulnerable groups and states that any effects would be below all recognised statutory thresholds for health protection, and would be short-term, temporary and would cease on completion of the works.</p> <p>This conclusion takes account of mitigation commitments by the Applicant. Details of the air quality changes are set out in the ES Chapter 22 Air Quality [APP-108]. The mitigation measures for Air Quality are set out in measures 22.1 to 22.9 of APP-282. Measure 22.2 [APP-282] and includes a stakeholder communications plan and community engagement before work commences.</p> <p>Air quality: Paragraph 186 of APP-114 lists key health outcomes relevant to air quality. Norfolk County Council notes that lung cancer and type 2 diabetes are also key health outcomes related to air quality. This is a fair comment. This inclusion does not change the findings of APP-114 with regards to air quality.</p>

ID	Local Impact Report Comment	Applicant's Response
		<p>APP-114 looks at health effects arising from changes to air quality in relation to dust and fine particulate from construction activities and emissions from construction vehicles and NRMM (para 184).</p> <p>In paragraph 198 the conclusion of the assessment for population health is given for air quality. It states that any change due to SEP and DEP will be a low magnitude of effect on a receptor of medium to high sensitivity. This represents an impact of minor adverse significance, i.e., not significant for the general population or vulnerable groups. Paragraph 198 goes on to list the vulnerable groups and states that any effects would be below all recognised statutory thresholds for health protection, and would be short-term, temporary and would cease on completion of the works.</p> <p>This conclusion takes account of mitigation commitments by the Applicant. Details of the air quality changes are set out in the ES Chapter 22 Air Quality [APP-108]. The mitigation measures for Air Quality are set out in measures 22.1 to 22.9 of APP-282. Measure 22.2 [APP-282] and includes a stakeholder communications plan and community engagement before work commences.</p> <p>Water quality during construction: This is a fair comment, and it is a refinement to the statement in APP-114 that the likelihood of these effects would reduce outside of the main recreational seasons due to a reduction in potential receptors i.e. fewer bathers in the off-season. This observation provides a context to the relation between source-pathway-receptor (as described in Table 28-10 of APP-114). This does not change the findings of APP-114 with regards to water contamination.</p> <p>Paragraph 223 of APP-114 notes that SEP and DEP has avoided significant impacts for contamination, has proposed mitigation in place where impacts are predicted, and will put in place measures to effectively manage and control contamination.</p> <p>The mitigation measures for Ground Conditions and Contamination are set out in measures 17.1 to 17.29 of APP-282. These include commitments to minimise impact to human health from exposure to contaminated soils and ground water (ref 17.5) and from exposure to contaminated soils, ground gas and vapours during construction (ref 17.6 to 17.12).</p>

ID	Local Impact Report Comment	Applicant's Response
		<p>The mitigation measures for Water Resources and Flood Risk are set out in measures 18.1 to 18.25 of APP-282.</p> <p>The Outline Project Environmental Management Plan (Revision B) [REP1-017], sets out requirements for regular environmental meetings and debriefs local to the site where representatives from the Project Team, the Principal Contractor, and key sub-contractors will consider matters such as the status of outstanding items, reports of environmental incidents or complaints and stakeholder engagement (paragraph 70). The Outline Project Environmental Management Plan (Revision B) [REP1-017] states that the final PEMP will detail the procedure in place to report public complaints in relation to offshore works.</p> <p>Paragraph 223 of APP-114 states that all effects would be short-term, temporary and would cease on completion of the works and that there would be no residual long-term change in population health outcomes.</p> <p>Health outcomes related to reduced physical activity: Paragraph 231 of APP-114 lists key health outcomes relevant to physical activity. Norfolk County Council notes that type 2 diabetes, unhealthy BMI, stroke and musculoskeletal conditions are also key health outcomes related to physical activity. This is a fair comment. This inclusion does not change the findings of APP-114 with regards to physical activity.</p> <p>APP-114 looks at health effects arising from changes to physical activity in relation to potential for physical activity to be temporarily affected by the temporary diversion of National Trails, Public Rights of Ways (PRoWs), cycle routes and long distance walking routes (herein referred to as 'routes') as well as some reduced access to the coast, as a result of the temporary disruption and/or restricted access (no greater than one week) to small portions of Weybourne Beach at landfall (paragraph 229).</p> <p>In paragraph 252 [APP-114] the conclusion of the assessment for population health is given for physical activity. It states that any change due to SEP and DEP will be a low magnitude of effect on a receptor of medium to high sensitivity. This represents an impact of minor adverse significance, i.e., not significant for the general population or vulnerable groups because the only direct impact on access of physical activity would be in relation to diversion</p>

ID	Local Impact Report Comment	Applicant's Response
		<p>of routes which will be temporary, localised and reversible. Paragraph 253 states that all effects would be short-term, temporary, fully reversible and would cease on completion of the works.</p> <p>This conclusion takes account of mitigation commitments by the Applicant. Details of the changes to Land Use, Agriculture and Recreation are set out in the ES Chapter 19 Land Use, Agriculture and Recreation [APP-105]. The mitigation measures for Land Use, Agriculture and Recreation are set out in measures 19.1 to 19.18 of APP-282. Measure 19.13 [APP-282] relates to potential disruption to onshore coastal assets; measure 19.4 (APP-282) secures mitigation related to air quality, noise, traffic and visual impacts through the Outline Code of Construction Practice (Revision B) [REP1-023]; measures 19.15-19.17 [APP-282] relate to impact on Public Right of Way across the planned area.</p> <p>Paragraph 255 of APP-114 sets out additional recommended mitigation measures to help minimise the risk of any change in behaviour.</p>
Discharge of Requirements		
71	<p>4.12.1. Where there is a local authority responsibility to be the discharging authority on any Requirement set out in the Development Consent Order (DCO), the County Council would expect the responsibility to sit with the relevant planning authority. As such the following Requirements in the DCO should be amended to reflect this:</p> <p>A) Requirement 16 Accesses (Highway Accesses) – this should be amended to read – (1) Construction of any new permanent or temporary means of access to a highway, or alteration, or use of an existing means of access to a highway, must not commence until an access plan for that access has been <i>submitted to and approved by the relevant planning authority, following consultation with the relevant highway authority</i> (amended text in red/italics);</p> <p>B) Requirement 24 (Public right of way Strategy) – this should be amended to read – (1) No phase of the onshore works that would</p>	<p>The Applicant notes Norfolk County Council's comments and its request to amend Requirements 16, 24 and 26. The Applicant is in discussions with Norfolk County Council and the relevant planning authorities in order to reach agreement with all parties on who should be the responsible discharging authority in relation to these Requirements. The Applicant will provide a further update and hopes to be in a position to include any necessary amendments to the dDCO at D3.</p>

ID	Local Impact Report Comment	Applicant's Response
	<p>affect a public right of way specified in Schedule 4 (public rights of way to be temporarily stopped up) is to be undertaken until a public right of way strategy in respect of that phase and in accordance with the outline public rights of way strategy, including the specification for making up of an alternative right of way (where appropriate) has been <i>submitted to and approved by the relevant planning authority, following consultation with the relevant highway authority</i> (amended text in red/italics);</p> <p>C) In addition Requirement 26 (Local Skills and Employment) – this should be amended to include the following: (1) No phase of the onshore works may commence until a skills and employment plan (which accords with the outline skills and employment plan) for that phase has been <i>submitted to and approved by the relevant planning authority, following consultation with Norfolk County Council; Norfolk Chambers of Commerce (as the author of the new Local Skills Improvement Plan) (amended text in red);</i> and (2) Each skills and employment plan must be prepared in consultation with the relevant planning authority; <i>Norfolk County Council; Norfolk Chambers of Commerce;</i> and must identify opportunities for individuals and businesses based in the relevant planning authority's area to access employment opportunities associated with the construction, operation and maintenance of the authorised development (amended text in red/italics).</p>	
Conclusion		
72	The County Council responded to an earlier consultation on the SEP and DEP in June 2021 and in February 2022 and supported the principle subject to a number of detailed matters being resolved.	Noted. No comment required.
73	These projects directly support the Government's target of delivering 40 gigawatts (GW) of offshore wind by 2030 set out in the Energy White Paper (2020) and The Ten Point Plan for a green industrial revolution (2020). These	Noted. No comment required.

ID	Local Impact Report Comment	Applicant's Response
	projects will contribute towards these targets, which include powering every home in the UK from green energy and support up to 60,000 jobs.	
74	The County Council has continued to work with both the offshore windfarm sector and National Grid to explore how these projects can support our own clean growth ambitions in line with the Government's vision for economic recovery that simultaneously addresses the challenge of climate change, offering opportunities for growth and job creation.	Noted. No comment required.
75	The development of the SEP and DEP will make an important contribution to the UK's target of 40GW of electricity generated by offshore wind by 2030. When operational the SEP and DEP would generate enough electricity to power 785,000 homes. These projects would support the County Council's net zero commitments as well as creating local jobs and longer terms opportunities for developing skills in the offshore energy sector.	Noted. No comment required.
76	The SEP and DEP are supported in principle by the County Council, and this was agreed at its Planning and Highways Delegations Committee on 26 October 2022. However, at this stage there is a holding objection at this stage from the County Council as the Lead Local Flood Authority (LLFA) in the absence of acceptable supporting information.	Noted. Please refer to the comments above.
77	In addition, Highway Officers are still assessing the detailed technical matters surrounding construction traffic and may need to raise further technical responses to the DCO.	Noted. Please refer to the comments above.
78	The County Council has agreed to support the principle of these offshore renewable energy proposals, in October 2022, subject to the detailed technical issues raised above being resolved through the DCO process. The County Council will continue to work with the developer on any outstanding issues.	Noted. The Applicant looks forward to continuing to work with the County Council.

1.4 North Norfolk District Council

Table 1-4 Applicant's comments on North Norfolk District Council's Local Impact Report

ID	Local Impact Report Comment	Applicant's Response
Introduction		
1	<p>This report sets out North Norfolk District Council's (NNDC) position in relation to the Development Consent Order (DCO) application for the Sheringham and Dudgeon Extension Projects made under the Planning Act (2008).</p> <p>NNDC is an Interested Party to this Nationally Significant Infrastructure Project (NSIP) with offshore cables reaching landfall at Weybourne and the onshore cable corridor passing through the District.</p> <p>In responding to this NSIP application, the District Council has drawn from, amongst other things, internal expertise in relation to:</p> <ul style="list-style-type: none"> • Coastal Processes • Landscape and Visual Impacts • Ecology • Environmental Protection • Economic Development <p>Were NNDC assessing the application under its functions as a Local Planning Authority, it would normally seek advice from external partners including Norfolk County Council who undertake a number of functions including as Highway Authority, Public Rights of Way and Lead Local Flood Authority. As the County Council is also an Interested Party, where stated within this report, NNDC will defer matters for consideration or comment of the County Council, given their statutory roles and considered knowledge and expertise.</p>	Noted. No further comment required.
Description of North Norfolk		

ID	Local Impact Report Comment	Applicant's Response
2	<p>NNDC's jurisdiction extends inland from the Mean Low-Water mark along the coastline. The proposal would affect land within NNDC stretching from the intertidal area at Weybourne and inland along the proposed cable route and 45m to 65m wide working corridor until it passes southwards out of the district into Broadland District Council near to Corpusty.</p>	<p>Noted. The Applicant would like to clarify that that the working easement of the single project is 45m and 60m for both projects.</p>
3	<p>North Norfolk District covers an area of 87,040 hectares (340 square miles) (excluding the Broads Authority Executive Area), with a 73km (45 mile) North Sea coastline. A significant proportion of the District is included within the nationally designated Norfolk Coast Area of Outstanding Natural Beauty (AONB) and the North Norfolk Heritage Coast. The eastern end of the District also adjoins The Broads, which has the status of a National Park.</p>	<p>Noted. No further comment required.</p>
4	<p>The main settlements in the District comprise seven towns (Cromer, Fakenham, Holt, North Walsham, Sheringham, Stalham and Wells-next-the-Sea) and three large villages (Briston / Melton Constable, Hoveton & Mundesley), which accommodate approximately half of the District's population (103,000 at the 2021 Census).</p>	<p>Noted. No further comment required.</p>
5	<p>The District's main road network comprises the A140 (Cromer to Norwich), the A148 (Cromer to King's Lynn - via Holt and Fakenham) and the A1065 (Fakenham to Mildenhall), as well as the more minor A1067, A149 and A1151. There is only one public rail service in the District, comprising the 'Bittern Line' linking Sheringham with Norwich (with stops between including the settlements of Cromer and North Walsham).</p>	<p>Noted. No further comment required.</p>
6	<p>The District has a strongly rural character with agriculture, in particular arable farmland, comprising by far the largest component of land use. The District contains a large number of agricultural holdings which are predominantly arable in nature and which include areas containing some of the best and most versatile agricultural land.</p>	<p>Noted. No further comment required.</p>
7	<p>A network of Rights of Way crosses open fields, heathlands and woodlands. Many of the large areas of coastline, heathland and woodland have open access. The Norfolk Coast Path National Trail follows the entirety of the District's coastline, linking with the Peddars Way in the west and the Paston Way in the east.</p>	<p>Noted. No further comment required.</p>

ID	Local Impact Report Comment	Applicant's Response
8	<p>There are many positive aspects of the North Norfolk environment such as:</p> <ul style="list-style-type: none"> • The stunning landscape of the North Norfolk Coast AONB, carefully managed by the Norfolk Coast Partnership to ensure it can be enjoyed by generations to come. • The large number of internationally and nationally designated sites and nature reserves, home to many rare and protected species and landscapes. • The wealth of archaeological and historic environment sites throughout the district, from the prehistoric to the Cold War. • The rare arable plants thriving in pockets of North Norfolk farmland. • The conservation groups, organisations and individuals working hard to record, protect and enhance the natural environment of North Norfolk. 	Noted. No further comment required.
9	<p>The District also has a significant tourism economy supporting an estimated 8,898 jobs in 2021 (22% of total employment in North Norfolk) with a total tourism value of £365m. The North Norfolk Core Strategy recognises the importance of tourism to the district. The strategic vision for North Norfolk in section 2 of the Core Strategy includes at paragraph 2.1.4:</p> <p>“Sustainable tourism, building on the unique natural assets of the countryside and coast, will be a major source of local income and employment and will be supported by an enhanced network of long- distance paths and cycle routes such as the North Norfolk Coastal Path and Weavers Way.”</p>	Noted. No further comment required.
Principle of Renewable Energy		
10	<p>NNDC is fully supportive of the principle of renewable energy development in helping to tackle the challenges faced by climate change.</p>	Noted. No further comment required.
11	<p>On 24 April 2019, NNDC's Full Council agreed a motion declaring a Climate Emergency. With the motion the Council acknowledged:</p>	Noted. No further comment required.

ID	Local Impact Report Comment	Applicant's Response
	<ul style="list-style-type: none"> • The devastating impacts that climate change and global temperature increases will have on the lives and livelihoods of people around the world, including on the health, safety and wellbeing of North Norfolk residents; • The urgent need for action to be taken fast enough for there to be a chance of further climate change being limited to avoid the worst impacts of drought, floods and extreme heat; • The opportunity for individuals and organisations at all levels to take action on reducing carbon emissions, from both production and consumption; • The need to enable low carbon living across society through changes to laws, taxation, infrastructure, policies and plans; • The Council's responsibility to help secure an environmentally sustainable future for our residents and in relation to the global effects of climate change. 	
12	<p>The Council resolved to;</p> <ol style="list-style-type: none"> 1. Declare a Climate Emergency; 2. Engage and work in partnership with our partners in the public, private and community sectors, including central government to facilitate bold action to ensure North Norfolk is able to play its role in helping the UK to deliver against the commitments made nationally and internationally at the 2015 Paris Summit; 3. Prepare an Environmental Sustainability & Climate Change Strategy in line with this pledge, and, with our partners across the community, to develop an action plan and 'route map' to a sustainable, low carbon future for our community; 4. Launch engagement with the public to: <ul style="list-style-type: none"> • Improve "carbon literacy" of all citizens; • Encourage and support leadership on this issue in all sectors of society; 	Noted. No further comment required.

ID	Local Impact Report Comment	Applicant's Response
	<ul style="list-style-type: none"> Obtain meaningful public input into the North Norfolk Environmental Sustainability & Climate Change Strategy and action planning; Facilitate wide community engagement and behavioural change. 	
13	<p>The Declaration of a Climate Emergency set the Council on a pathway towards doing all that it reasonably can to address the impacts of climate change. This will undoubtedly include continuing to support renewable energy National Significant Infrastructure Project proposals and working with applicants to deliver these projects in a way that minimises any adverse impacts.</p>	<p>Noted. The Applicant acknowledges NNDC's support in helping to deliver this Project in a way that minimises any adverse impacts.</p>
14	<p>The District Council recognises the national importance of having a balanced supply of electrical generation including increasing renewable energy supplies from offshore turbines in helping decarbonise the UK's energy sector. Accordingly, the project's contribution to renewable energy is a significant positive impact.</p>	<p>Noted. The Applicant acknowledges NNDC's support of the projects significant positive impact in helping decarbonise the UK's energy sector.</p>
15	<p>The Council has already played an active part in a number of Nationally Significant Infrastructure Projects (NSIP) including:</p> <ul style="list-style-type: none"> Ørsted Hornsea Project Three (2.4GW) offshore windfarm; and Vattenfall Norfolk Vanguard (1.8GW) offshore windfarm Vattenfall Norfolk Boreas (1.8GW) offshore windfarm <p>All of these schemes reach landfall on the North Norfolk coast with associated cable corridors and booster stations (Ørsted Hornsea Project Three) running through the District. These schemes alone (together with SEP & DEP Extension Projects would, once built, provide enough electricity combined to power in excess of 5.3 million homes (more than 16% of total UK households). This would make a significant contribution towards the UK's commitment towards 'net zero' greenhouse gases to be delivered by 2050.</p>	<p>Noted. No further comment required.</p>
16	<p>At a local level, the District Council has made a significant contribution of its own through, amongst other things, the grant of planning permission for in</p>	<p>Noted. No further comment required.</p>

ID	Local Impact Report Comment	Applicant's Response
	excess of 150MW capacity of solar farms, with electrical output capable of powering over 40,000 homes, in North Norfolk. This has been delivered without significant adverse impacts on the wider landscape (including development within and/or adjacent to the Norfolk Coast Area of Outstanding Natural Beauty) through, amongst other things, careful siting and design.	
17	The onshore element of the SEP & DEP projects passes through some sensitive and valued landscapes and this emphasises the importance of key design considerations which will help to reduce overall impacts, both short, medium and long-term.	Noted. No further comment required.
Marine Processes		
18	NNDC's jurisdiction extends inland from the Mean Low-Water mark. This means that an element of the marine processes falls within the consideration of the District Council at the point where offshore cables come onshore.	Noted. No further comment required.
19	<p>The main area of interest for the District Council is in relation to the method of bringing offshore cables onshore in the Weybourne area including the potential impact of works on nearshore coastal processes. NNDC welcome the position set out by Equinor at paragraph 250 of Chapter 4 (Project Description) of the Environmental Statement which states:</p> <p>'The offshore export cables make landfall at Weybourne, at a location to the west of Weybourne beach car park in proximity to the Muckleburgh Military Collection. The offshore export cables will be connected to the onshore export cables in transition joint bays, having been installed under the intertidal zone by HDD. ... This technique has been selected by the Applicant in order to avoid any impact on the features of the MCZ in this area'.</p>	Noted. The Applicant acknowledges NNDC's support for long HDD landfall.
20	NNDC are fully supportive of the proposed use of HDD by Equinor to bring cables onshore for these projects.	Noted. The Applicant acknowledges NNDC's support for long HDD landfall.
21	In the likely event of the DCO being granted, NNDC would not expect that any subsequent changes from the HDD option to bring cables onshore to the use of open cut trenching could be permitted within the scope of a 'non-material' amendment as this would take the proposal outside the scope of the	Noted. The Applicant confirms its intention to use HDD to bring the export cables onshore at landfall.

ID	Local Impact Report Comment	Applicant's Response
	Environmental Statement. 'Open cut trenching' would represent the very worst option for NNDC, hence why there is strong support for HDD.	ES Chapter 3 Site Selection and Assessment of Alternatives [APP-089] describes how the project design has been developed. Section 3.7 describes how consultation and feedback from consultees helped inform the chosen location of the landfall. Paragraph 14 lists the key project decisions that have been made by the Applicant as a result of the consultation process. This includes the use of long HDD at the landfall to avoid works such as open trenching on the beach and cliffs. In addition, the Applicants commitment to long HDD at the landfall results in the complete avoidance of the sensitive outcropping chalk feature in the nearshore portion of the Marine Conservation Zone (MCZ).
Water Resources and Flood Risk		
22	In respect of the impact of the project on water resources and flood risk within NNDC jurisdiction, NNDC defer to the expert advice of the Environment Agency in respect of the strategic overview of the management of all sources of flooding and coastal erosion, and to the advice of Norfolk County Council Lead Local Flood Authority in respect of developing, maintaining and applying a strategy for local flood risk management in this area and for maintaining a register of flood risk assets. NNDC also defer to the advice of Norfolk Rivers Internal Drainage Board who may manage assets within/along/near the route of the proposed onshore cable corridor.	The position of NNDC is noted by the Applicant, and no further response is required.
Land Use and Agriculture		
23	NNDC consider that the primary consideration for land use and agriculture relates to the timing of works (such as avoiding taking agricultural land out of production for long periods of time) how works are undertaken (to be agreed within the Outline Code of Construction Practice (OCoCP) including the method for handling/storing soils. As such the significance of any impacts are dependent on the requirements to be agreed within the DCO.	The Applicant refers NNDC to the Outline Code of Construction Practice (Revision B) [REP1-023, Section 5] which outline the soil management and handling measures the Project has committed to. The Code of Construction Practice is secured via Requirement 19 (Code of Construction Practice) of the Draft DCO (Revision D) [document reference 3.1].
Onshore Ecology and Onshore Ornithology		
24	Equinor have undertaken desktop studies and Extended Phase 1 Habitat Surveys together with site specific surveys in accordance with best practice recommendations in order to inform the baseline data which underpin Environmental Statement Volume 1 Chapter 20 – Onshore Ecology and	The Applicant acknowledges the comment and refers NNDC to the Outline Ecological Management Plan (Revision B) [REP1-027, Appendix 1] which

ID	Local Impact Report Comment	Applicant's Response
	Ornithology [APP-106]. NNDC consider that some update / pre-construction surveys are likely to be required for some species and that the results of these surveys should be used to identify any amendments to proposed mitigation within the Outline Ecological Management Plan (OEMP) and/or licensing requirements necessary.	summarised the Applicant's forthcoming (i.e. pre-construction) onshore ecology and ornithology survey commitments.
25	NNDC are broadly supportive of proposed DCO Requirement 13 'Ecological Management Plan' subject to agreement to the final OEMP document which underpins the requirement and which should ensure key ecological objectives are met.	The Applicant acknowledges the comment, no further comment required.
Traffic and Transport		
26	NNDC do not wish to comment on traffic and transport matters and defer such matters of consideration to Norfolk County Council, who are the Highway Authority covering North Norfolk and who are the technical experts who would normally give highway advice to the District Council.	Noted. The Applicant has had productive discussions with NCC Highways and is in now in agreement on all but one matter. An updated Statement of Common Ground will be submitted at Deadline 3, by which time is anticipated that agreement on all matters will be reached.
Noise, Vibration and Air Quality		
27	Whilst NNDC raise no Air Quality impact concerns, at the time of submission of this Local Impact Report, discussions are on-going as part of the Statement of Common Ground (SoCG) in relation to significant noise and vibration concerns. These matters relate primarily to baseline evidence and the impact this baseline data has on suggested mitigation.	Noted. The Applicant confirms that productive discussions with NNDC regarding the SoCG are ongoing. Of note, the criteria for assessing construction noise impacts are described ES Chapter 23 Noise and Vibration Chapter [APP-109, Table 23-11]. This Table shows that the construction noise level criteria adopted for the assessment are independent of the baseline noise levels. Hence, the baseline data have no impact on the impact assessment or the suggested mitigation.
28	NNDC have raised concerns with the Applicant that there is potential for the underestimation of evening and night-time noise impacts, as background noise may be lower than the survey indicates. This may result in insufficient noise mitigation measures being selected, with adverse impacts on nearby receptors. Further discussions are taking place with additional submissions expected at Deadline 2.	Please refer to response to ID 27.
29	NNDC will continue to work with the applicant to ensure the DCO requirements and underpinning OCoCP documents can deliver their intended purpose.	Noted. The Applicant looks forward to continuing to work with NNDC.

ID	Local Impact Report Comment	Applicant's Response
Onshore Archaeology and Cultural Heritage		
30	NNDC consider that, whilst there will be some impacts to heritage assets and their settings, this impact will occur primarily at construction stage and are therefore of a temporary nature.	The position of NNDC is noted by the Applicant. No further comment is required.
31	NNDC consider that these impacts are all on the 'less than substantial' scale and the operational phase of the windfarm is considered unlikely to result in unacceptable impacts. On this basis, the considerable public benefits associated with the windfarm would more than outweigh the 'less than substantial' harm to heritage assets within North Norfolk.	The position of NNDC is noted by the Applicant. No further comment is required.
32	In respect of archaeology, NNDC defers to the advice of Norfolk County Council Historic Environment Service who provide advice to NNDC in relation to all matters of archaeological heritage.	The position of NNDC is noted by the Applicant, and no further comment is required.
Landscape and Visual Impact Assessment		
33	NNDC consider that there will be some residual landscape and visual effects after the construction phase associated with tree and hedgerow removal. It is noted that the onshore cable route easement would prevent replacement trees being planted and this will require careful consideration with regard to mitigation planting.	<p>NNDC's comment are noted.</p> <p>In response, the Applicant refers firstly to ES Chapter 26 LVIA [APP-112, para. 54], which states (inter alia):</p> <p><i>"Hedges would be re-planted in all scenarios on their original alignment. Trees and woodland would be replanted within the construction corridor/Order Limits but outside the final permanent cable corridor easement. Where both SEP and DEP are built (concurrently or sequentially) the permanent easement will be 20m. Where only SEP or DEP is constructed, the permanent easement will be 10m. Within this permanent easement, tree planting would be prohibited. Planting would be implemented during the first planting season following the completion of entire construction of the cable installation works, of either SEP or DEP (subject to landowner agreements), whether constructed concurrently or sequentially, and maintained for ten years."</i></p> <p>Paragraph 24 of the OLMP (Revision B) [REP1-025] further explains that in order "...To prevent future root damage to cables, no trees would be planted within the permanent cable easement."</p>

ID	Local Impact Report Comment	Applicant's Response
		<p>Whilst the Applicant acknowledges that no tree can be planted within the permanent cable easement, the Applicant commits to delivering (within the Order Limits) hedgerow enhancement beyond the permanent cable easement, where practicable and agreed with the landowner. Furthermore, where existing trees will be removed new broadleaved native tree would be planted along the hedgerows elsewhere within the wider landholding, where practicable and agreed with the landowner [REP1-025, para 25].</p> <p>In relation to comments regarding residual landscape and visual effects after the construction phases associated with tree and hedgerow removal, the Applicant refers to ES Chapter 26 LVIA [APP-112, Section 26.6.2]. Here, the effects that would arise as a result of the proposed onshore cable corridor on landscape and visual receptors are set out, based on the realistic worst-case scenario ('RWCS') for the onshore cable corridor. The LVIA's RWCS assumes that both SEP and DEP would be constructed sequentially with the largest potential gap between the start of construction of the first Project and the start of construction of the second Project. Therefore, it is the Applicant's position that the greatest effects in relation to the onshore cable corridor have been identified as part of the LVIA [APP-112].</p>
34	<p>For previous NSIP offshore windfarm schemes, NNDC identified a need (evidenced by climatic variances) for 10-year replacement planting periods for proposed mitigation planting. NNDC is pleased to see that the applicant proposes 10-year replacement planting period as contained within draft DCO Requirement 12 (2).</p>	<p>The position of NNDC is noted by the Applicant. No further comment is required.</p>
35	<p>NNDC have raised some concerns with the applicant about Weybourne Woods where a 100m x 50m area of woodland will require clearance for a drill entry/exit compound. NNDC note that paragraph. 1.2.3.26 of the Outline Landscape Management Plan (OLMP) states:</p> <p>'Where coniferous plantation trees would be permanently removed, the land will be re-instated to a suitable habitat agreed with the land owner and that accord with the objectives of the wider AONB'.</p>	<p>NNDC's comment are noted by the Applicant.</p> <p>In response, the Applicant refers firstly to the embedded mitigation measures (as described in Chapter 4 Project Description [APP-090] and secondly the OLMP (Revision B) [REP1-025,]). The approach has been to reduce impacts as much as possible through use of embedded mitigation within the design, route and installation of the cable has been selected on the basis that it would the least impact.</p>

ID	Local Impact Report Comment	Applicant's Response
		<p>With regard to Weybourne Woods, the Applicant refers to the Design and Access Statement (onshore) [APP-287, Section 6.4], which states (inter alia):</p> <ul style="list-style-type: none"> • <i>“The use of trenchless crossings within the AONB is limited to 400m long sections. This is the maximum length of HDD that can be safely drilled within the underlying geology (comprising sands and gravels); and</i> • <i>With regard to Weybourne Wood, due to its width (i.e. greater than 400m), an entry and exit compound is required within the woodland to ensure a safe trenchless crossing. As a result, some localised vegetation removal is required within the wood. The compound will be located in a less sensitive area of the wood, where approximately 50% of existing trees are either dead or dying (see Chapter 20 Onshore Ecology and Ornithology [APP-106], Appendix 20.15 Arboricultural Report [APP-228]). Following construction activity, this area will be converted to mixed scrub, which provides enhanced biodiversity relative to the existing conifer plantation.”</i> <p>Furthermore, as the OLMP (Revision B) [REP1-025, para. 5] states (inter alia):</p> <p><i>“Local planning authorities (and any other relevant stakeholders, such as the Norfolk Coast Area of Outstanding Natural Beauty (AONB) Partnership) will be consulted on this OLMP after submission of the DCO application, prior to the construction of the onshore cable corridor and onshore substation site. The final Landscape Management Plan will be submitted for discharge of relevant DCO requirement relating to the OLMP.”</i></p> <p>Therefore, consultation on proposals related to new habitats and their suitability within Weybourne Wood will be undertaken between NNDC and the Application following the DCO consent and prior to construction of the onshore cable corridor.</p> <p>The OLMP (Revision B) [REP1-025] is secured by Requirement 11 (Provision of landscaping) of the draft DCO.</p>
36	NNDC note that OLMP makes very little reference to the principles that will guide replacement and mitigation planting along the cable route. NNDC	NNDC's comments are noted by the Applicant.

ID	Local Impact Report Comment	Applicant's Response
	<p>consider it should be set out within the OLMP that proposals will be informed by the Landscape Guidelines set out in both the North Norfolk Landscape Character Assessment (2021 SPD) and the Norfolk Coast AONB Integrated Landscape Character Guidance. Discussions are on-going between NNDC and the applicant and further responses are expected to be provided for Deadline 2</p>	<p>The Applicant notes in response that (inter alia) <i>“Local planning authorities (and any other relevant stakeholders, such as the Norfolk Coast Area of Outstanding Natural Beauty (AONB) Partnership) will be consulted on this OLMP after submission of the DCO application, prior to the construction of the onshore cable corridor and onshore substation site. The final Landscape Management Plan will be submitted for discharge of relevant DCO requirement relating to the OLMP.”</i> [APP-303, para. 5.].</p> <p>Further to the award of DCO consent, guidance documents relevant to the onshore cable corridor and substation will be used to inform the development of the detailed landscape scheme and NNDC will be consulted on proposals related to proposals being put forward.</p> <p>The Applicant therefore does not propose to make any revisions to the submitted OLMP (Revision B) [REP1-025] in order to list the guidance documents that would be used to inform the detailed design development post DCO consent.</p>
<p>Tourism, Recreation and Socio-Economics</p>		
<p>37</p>	<p>During the examination of Ørsted Hornsea Project Three, Norfolk Vanguard and Norfolk Boreas offshore windfarm NSIPs, NNDC made numerous submissions concerning the impact of proposed windfarm construction activities on tourism within North Norfolk, arising from direct impacts and from the impacts of negative perceptions caused by awareness of the construction activity taking place. NNDC have some concerns that the impact of the project on tourism may well be being underestimated by the Applicant.</p>	<p>The Applicant is not familiar with the specific details of previous submissions made by NNDC in relation to Ørsted Hornsea Project Three, Norfolk Vanguard and Norfolk Boreas offshore windfarms.</p> <p>The assessment for SEP and DEP is based on the best available evidence of the relationship between offshore wind farm development and tourism. Further detail is provided below on how the impacts during construction have been assessed [APP-113].</p>
<p>38</p>	<p>Based on 2021 data, the Tourism sector in North Norfolk has retracted significantly compared to 2018 data. In 2021 the District supported an estimated 8,898 jobs (22% of total employment in North Norfolk) with a total tourism value of £365m total tourism value. In 2018 this figure was £511m total tourism value, 11,461 jobs (29% of total employment). Whilst this impact is likely as a direct result of Covid-19 and changing patterns of behaviour, any further impacts upon the tourism sector will likely have a disproportionately high impact upon the overall economy of the District. (Source: Economic Impact of Tourism – North Norfolk 2018 and 2021</p>	<p>As noted in the comment, the fall in visitor volume and value between 2018 and 2021 can be attributed to the Covid-19 pandemic. The economic impact reports undertaken on behalf of NNDC for earlier years (all undertaken by Destination Research) show that the number of trips and total value of visitor expenditure had grown year-on-year in every year between 2015 and 2019 suggesting the local visitor economy was in good health prior to the pandemic in 2020.</p> <p>It should be noted that the estimated effect on tourism employment in the 2021 economic impact report is potentially overstated. This is based on</p>

ID	Local Impact Report Comment	Applicant's Response
	<p>produced by Destination Research/Sergi Jarques – Copies attached at Appendix A and Appendix B.</p>	<p>modelled estimates rather than actual data on changes in employment in tourism related sectors (e.g., hotels and restaurants). Analysis of trends for North Norfolk in the Business Register and Employment Survey, which is based on the actual number of employees employed by businesses, shows that the number of employees in tourism related sectors remained unchanged at 6,000 employees in 2019, 2020 and 2021. This uses a broad definition of tourism related industries which includes hospitality, transport, arts and entertainment activities and some retail. If we focus only on hotels and restaurants, this shows the number of jobs increased by 250.</p> <p>This suggests tourism employment in North Norfolk has been more resilient than implied by the modelled estimates.</p>
39	<p>In this regard, whilst NNDC believes the long-term impacts of the cable route on the tourism economy will be benign, the Council has very significant concerns that during the cable corridor construction phase there will be serious impacts on local tourism businesses such that the construction works will have a substantial impact on the income of tourism businesses in the area, which needs greater recognition within the DCO.</p>	<p>The applicant welcomes NNDC's recognition that the long-term impacts of the cable route on the tourism economy will be benign. However, the concern that construction of the corridor will have a negative impact on tourism and the income of local businesses is not supported by evidence.</p> <p>The evidence on the relationship between wind farms and tourism is summarised in the Socio-economics and Tourism Technical Baseline [APP-113]. Very few studies have looked specifically at effects on tourism during the construction of onshore infrastructure. One exception to this is research undertaken by Biggar Economics (East Anglia ONE North and East Anglia TWO Offshore Windfarms Responses to ExA WQ1: Appendix 13 Tourism Impact Review, Biggar Economics, 2021). This compared the change in local tourism employment with the long-term average in 11 areas where offshore wind farms had been constructed. This found that, in the majority of cases, tourism in the local district performed better during the construction period than the long-term average. Similar analysis was undertaken by Hatch as part of the Environmental Statement for the Awel-y-Mor offshore wind farm and found similar results (Awel y Mor Offshore Wind Farm, Category 6: Environmental Statement; Volume 5, Annex 4.2: Seaside Tourism Economics Employment Evidence, Hatch, 2022). This focused on five areas over the period when new offshore wind farms had been constructed. In all five areas, the number of jobs in tourism sectors increased during the</p>

ID	Local Impact Report Comment	Applicant's Response
		<p>construction period, and in four of five, it grew at a faster rate than the regional average.</p> <p>It is also possible to analyse trends in visitor numbers and visitor expenditure in North Norfolk over the period when Dudgeon wind farm was constructed (2015 to 2017), the cable corridor of which passed through the district. This is based on data from the Economic Impact of Tourism reports undertaken on behalf of NNDC by Destination Research. These show the number of day trips to North Norfolk increased by 815,000 between 2015 and 2017 (+11%), the number of overnight trips increased by 62,000 (+10%) and total visitor expenditure increased by £20.4m (+5%). There is therefore no evidence that similar projects had a negative effect on tourism in the district.</p>
40	<p>NNDC considers that the impact on tourism arises primarily from negative perceptions. A better description would be "Actual Tourism Impact of Negative Perceptions".</p>	<p>While it is possible that some visitors will have a negative perception of the onshore works, there is no evidence that this will result in an adverse economic impact on local tourism (for the reasons described above).</p>
41	<p>NNDC's position in previous windfarm examinations has been that the DCO should include a requirement for a tourism and associated business impact mitigation strategy to address the likely adverse impacts on the tourism sector within North Norfolk.</p>	<p>The assessment of the effects of onshore works on tourism volume and value has considered a number of embedded mitigation measures which will minimise disruption to visitors. These include:</p> <ul style="list-style-type: none"> • Long HDD at landfall which will avoid physical disturbance or prolonged access restrictions to Weybourne Beach. • Trenchless crossings on cycle routes, National Trails, long distance walking routes (e.g. the Norfolk Coastal Path) all A and B roads and 16 other local roads which will minimise disruption to people on walking or cycling holidays or day-trips in North Norfolk. • Construction of an (up to) 6m wide haul road with an approximate length of up to 60km to reduce the number of access points and Heavy Goods Vehicle (HGV) trips on the local road network. <p>The assessment concludes that these mitigation measures will be sufficient to reduce residual effects on tourism volume and value to minor adverse which is not significant. Therefore it is the applicant's position that further mitigation is not required.</p>

ID	Local Impact Report Comment	Applicant's Response
42	However, despite reasonable evidence being presented, the concerns of NNDC were not taken forward by the ExA or Secretary of State when granting subsequent DCO consent for Norfolk Vanguard and Norfolk Boreas. The ExA are invited to consider whether any further evidence is required on this issue.	The applicant is not familiar with the evidence presented by NNDC in relation to Ørsted Hornsea Project Three, Norfolk Vanguard and Norfolk Boreas offshore windfarms. Furthermore, NNDC has not presented any specific evidence to show that local tourism could be negatively affected by construction of SEP and DEP. The responses given above provide a summary of the available evidence in support of the Applicant's position.
Statement of Common Ground		
43	At the time of submission of this Local Impact Report (Deadline 1 – 20 Feb 2023), NNDC and Equinor have been working together to produce a Statement of Common Ground.	The Applicant confirms this is NNDC and Equinor have been working together to produce a Statement of Common Ground.
44	This will ensure that there will be a clear understanding of the areas of agreement and areas of disagreement to enable focussed discussion at the Issue Specific Hearings.	Agreed, no further comment required.
45	Further discussions are proposed to take place in the coming weeks and Equinor have confirmed that they will submit the latest iteration of the draft/interim Statement of Common Ground to the Planning Inspectorate at Deadline 2 following those discussions.	Agreed, no further comment required.
46	Many of the issues raised within the draft Statement of Common Ground are captured within this Local Impact Report.	Agreed, no further comment required.
Conclusions		
47	NNDC welcome and support the principle of renewable energy development to help meet the challenges of climate change and support the development of stronger and resilient electricity networks capable of reducing reliance on fossil fuels and to reduce the need to import electricity from outside of UK waters.	Noted. No further comment required.
48	Nonetheless, the proposed SEP & DEP Project has the potential to result in some impacts across North Norfolk District, particularly during construction	Noted. The Applicant looks forward to working with the NNDC further.

ID	Local Impact Report Comment	Applicant's Response
	and it is important that those adverse impacts are reduced as much as possible and appropriate mitigation provided. Many of the potential impacts are or can be made acceptable through the drafting of the Development Consent Order.	
49	However, there remain some areas of disagreement between the parties but the majority of matters or issues are capable of being resolved either through existing proposed requirements within the draft DCO, amendments to specific requirements in the draft DCO, introduction of new requirements or clarifications to Outline documents supporting specific requirements.	Noted. The Applicant looks forward to working with the NNDC further.
50	NNDC will continue to work with Equinor to resolve outstanding matters and to ensure that the maximum amount of community benefits can be secured both through the Development Consent Order process and through individual negotiation for the wider benefit of North Norfolk.	Noted. The Applicant looks forward to working with the NNDC further.

1.5 South Norfolk District Council

Table 1-5 Applicant's comments on South Norfolk District Council's Local Impact Report

ID	Local Impact Report Comment	Applicant's Response
Introduction		
1	<p>This Local Impact Report (LIR) has been prepared by South Norfolk Council (SNC) in accordance with the advice and requirements set out in the Planning Act 2008 (as amended) as, 'a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area)'.</p> <p>In preparing this LIR the local authority has had regard to the DCLG's Guidance for the examination of applications for development consent (2015) and the Planning Inspectorate's Advice Note One, Local Impact Reports (2012).</p> <p>The LIR relates only to the onshore elements and identifies the most relevant policies and the main issues the Council has concerns over.</p>	Noted. No further comment required.
Details of the proposal		
2	<p>The Application is for development consent to construct and operate two offshore wind farm generating stations, known as Sheringham Shoal Offshore Wind Farm Extension Project (SEP) and Dudgeon Offshore Wind Farm Extension Project (DEP), both located off the coast of Norfolk (together "the Projects"). SEP is the proposed extension to the operational Sheringham Shoal Offshore Wind Farm and will comprise up to 23 wind turbine generators, together with the associated onshore and offshore infrastructure. The offshore export cable corridor from SEP to landfall will be approximately 40km in length and the onshore cable corridor will be approximately 60km in length. DEP is the proposed extension to the operational Dudgeon Offshore Wind Farm and will comprise up to 30 wind turbine generators, together with the associated onshore and offshore infrastructure. The offshore export cable</p>	Noted. No further comment required.

ID	Local Impact Report Comment	Applicant's Response
	<p>corridor from DEP to landfall will be approximately 62km in length and the onshore cable corridor will be approximately 60km in length.</p> <p>The project will make landfall at Weybourne, North Norfolk with a buried cable route between Weybourne and grid connection at Norwich Main National Grid Substation. The route will run through three Local Authorities North Norfolk, Broadland and South Norfolk.</p> <p>The substation/converter is to be located at a site south of Norwich Main, immediately west of the Norwich to Ipswich rail line. Accessed via the A140 and then Mangreen Lane (currently part of the operational access to Norwich Main). The substation will be open Air Insulated Substation. The substation would comprise of up to 2 Control buildings; up to 2 Static var compensator (SVC) buildings if required; transformers, reactors etc. and ancillary and supporting equipment. The largest buildings within the substation will be the control building and SVC building with a maximum height of 15m. Both buildings are anticipated to be single storey, cube or cuboid shaped. The detailed design and materials of the substation/converter does not form part of the application; however, the maximum design parameters have been provided. The tallest feature within the onshore substation site will be the lightening masts at a height of 30m.</p>	
Relevant development proposals under consideration or granted permission but not commenced or completed		
3	<p>National Highways NSIP's:</p> <ul style="list-style-type: none"> • A47 – A11 Thickthorn Junction – TRO10037, granted consent 14 October 2022 • A47 North Tuddenham to Easton – TRO10038, granted consent 22 June 2022 • Hornsea Three Off-Shore Wind Farm NSIP - EN010080, consent granted 31st December 2020 and discharge of requirements being submitted to LPA's • East Anglia Green Energy Enablement (GREEN) Project; pre-application stage – non statutory consultation. 	<p>The Applicant thanks SNC for providing details of relevant development proposals under consideration or granted permission but not commenced or completed.</p> <p>The Applicant confirms the following projects were considered in the ES:</p> <ul style="list-style-type: none"> • A47 – A11 Thickthorn Junction – TRO10037, granted consent 14 October 2022 • A47 North Tuddenham to Easton – TRO10038, granted consent 22 June 2022

ID	Local Impact Report Comment	Applicant's Response
	<ul style="list-style-type: none"> Land at Honingham, adjacent to Easton. Greater Norwich Food Enterprise Zone Local Development Order ref 20170052 2021/2495: Land North and South of brick Kiln Lane, Swainsthorpe. <p>Installation of a solar farm comprising ground mounted solar panels, access tracks; inverter/transformers, substation; storage, spare parts and welfare cabins, underground cables and conduits, perimeter fence; CCTV equipment, temporary new site entrance and access track, temporary construction compounds, and associated infrastructure and planting scheme. Application is accompanied by an environmental statement. Approved with Conditions.</p> <ul style="list-style-type: none"> 2021/2645: Land North of Stoke Lane, Dunston <p>The installation and operation of a Battery Energy Storage System to provide standby emergency electricity for National Grid in times of high electricity demand or when renewable energy projects are unable to fulfil demand. This would be for the installation of 130MW of modular battery units with ancillary equipment, including power conversion units, 132kV transformer compound, metering cabinet, switch room, DNO control room and welfare container. Approved with Conditions.</p> <ul style="list-style-type: none"> 2022/0867: Land East of Main Road Swardeston <p>Construction and operation of Energy Balancing Infrastructure (EBI) comprising energy storage technology, to form up to two areas of modular or containerised structures. To include containerised or modular battery array, transformers and inverter area, switchgear and control room building(s), connection of EBI plant to the Hornsea Three Onshore Converter Station (ONCS), required access and internal roads, drainage systems, perimeter and internal fences, and required external lighting and lightning pylons. Development is located within the Hornsea Three ONCS area as consented by the Hornsea Project Three Offshore Wind Farm Development Consent Order (DCO) in December 2020. The application is accompanied by an environmental statement. Approved with Conditions.</p>	<ul style="list-style-type: none"> Hornsea Three Off-Shore Wind Farm NSIP - EN010080, consent granted 31st December 2020 and discharge of requirements being submitted to LPA's <p>The Applicant refers SNC to the Applicants Responses to the Examining Authority's First Written Questions [REP1-037/038, Q1.9.1.5] for further details on the EAG Energy Enablement (GREEN) Project.</p> <p>In relation to the Land at Honingham, adjacent to Easton, the Applicant confirms that the planned residential scheme, granted in 2016, which is to be phased over a 10 year period (2021-2031) has been included in the CIA for the ES Chapter 18 Water Resources and Flood Risk [APP-104].</p> <p>The Applicant is in discussions with the developers of the Food Enterprise Partnership and is aware of the Greater Norwich Food Enterprise Zone Local Development Order ref 20170052.</p> <p>The Applicant refers SNC to the Applicants Responses to the Examining Authority's First Written Questions [REP1-033/034, Q1.9.1.3] for further details on:</p> <ul style="list-style-type: none"> 2021/2645: Land North of Stoke Lane, Dunston 2022/0867: Land East of Main Road Swardeston <p>Bloy's Grove Solar Farm (Planning permission for 2021/2495: Land North and South of brick Kiln Lane, Swainsthorpe), was granted 4th August 2022. There is no special overlap between this and SEP and DEP. Construction of the Solar Farm is due to start early 2024, with the site fully operational by October 2024. The earliest construction start date for the main works of SEP and DEP is expected to be 2025 and the latest is 2028. Therefore it is anticipated that there will be no temporal overlap between the two projects.</p>

ID	Local Impact Report Comment	Applicant's Response
		The Applicant will seek to engage with the developer of Bloy's Grove Solar Farm.
Relevant development plan policies, supplementary planning guidance etc		
4	<p>The following policies are considered relevant to the consideration of this application (relevant extracts of each policy are attached as Appendix 1).</p> <p>Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS) adopted in March 2011, amendments adopted January 2014.</p> <p>Policy 1 : Addressing climate change and protecting environmental assets</p> <p>Policy 2 : Promoting good design</p> <p>South Norfolk Local Plan (SNLP)</p> <p>South Norfolk Local Plan Development Management Policies, adopted October 2015</p> <p>DM1.4 : Environmental Quality and local distinctiveness</p> <p>DM3.8 : Design Principles applying to all development</p> <p>DM3.13 : Amenity, noise, quality of life</p> <p>DM3.14 : Pollution, health and safety</p> <p>DM4.4 : Natural Environmental assets - designated and locally important open space</p> <p>DM4.5 : Landscape Character Areas and River Valleys</p> <p>DM4.8 : Protection of Trees and Hedgerows</p> <p>DM4.9 : Incorporating landscape into design</p> <p>DM4.10 : Heritage Assets</p>	Noted. No further comment required.
Design for the substation		

ID	Local Impact Report Comment	Applicant's Response
5	Policies DM3.8 of SNLP, Policy 2 of JCS and Section 12 of the NPPF require high quality design with importance being attached to the design of the built environment, which is seen as a key aspect of sustainable development.	Noted. No further comment required.
6	The form is simple and driven by the functional requirements of the substation and is typical of the substations required for this type of development. The buildings are anticipated to comprise a steel framed structure with roofs and wall constructed of prefabricated, insulated panels. As set out above the detailed design and materials of the substation does not form part of the application.	Noted. No further comment required.
7	The Council fully appreciates that the design of the substation is functionally lead, however key to trying to mitigate the impact of the substation on the open countryside, which is presently a rural landscape setting, is the careful consideration of the material palette in particular its colours. Given the size and scale of the substation (15m in height) landscaping/planting will not minimise the impact of the substation at its higher level. The Council notes that Requirement 10: Detailed design parameters onshore, includes external appearance and materials are to be agreed with the Local Planning Authority. Should the proposed development be granted consent, the Council would wish to work with the applicant to ensure appropriate and sensitive materials and colours are used in the development, having regard to minimising its impact on the character and visual appearance of the area.	<p>The position of SNC is noted by the Applicant.</p> <p>The Design and Access Statement (Onshore) [APP-287] states at paragraph 7.6.1 (inter alia): <i>"The final design of the substation will be informed by a colour study of the local landscape undertaken post-consent. The purpose of the colour study will be to inform the external appearance of the substation buildings and structures where it is reasonably practicable to so. This would include the identification of prominent colours within the existing landscape to inform a possible colour palette that could be applied to the substation design. It would support the integration of the substation into the local landscape and setting."</i></p> <p>The Applicant can confirm that they will work with SNC to ensure that appropriate and sensitive materials (including colour) will be used in the detailed design development on the onshore substation in order to minimise the potential impacts that could arise on the surrounding landscape character and visual amenity within the local area.</p> <p>Requirement 10 of the draft DCO (Revision D) [document reference 3.1] requires details that details including the external appearance and materials for the substation will be submitted to and approved by the relevant planning authority. Requirement 10(5) of the draft DCO (Revision D) [document reference 3.1] requires that the details to be submitted must be in accordance with the Design and Access Statement (Onshore) [APP-287].</p>
Heritage Assets		

ID	Local Impact Report Comment	Applicant's Response
8	Heritage issues arise from both the underground cabling and the installation of the substation. This includes impacts on conservation areas and listed buildings which should be assessed in relation to policy DM4.10 of the SNLP and Section 16 of the NPPF.	The Applicant confirms that the impacts on Conservation Areas and Listed Buildings were assessed in relation to policy DM4.10 of the SNLP and Section 16 of the NPPF in ES Chapter 21 Onshore Archaeology and Cultural Heritage [APP-107].
9	The Council note that para 107 of the applicants submissions states: "The assets identified above were found to either not share intervisibility or had limited intervisibility with the onshore substation and associated infrastructure and the offshore infrastructure. This was considered to have little to limited change on their setting, and due to their distance from the above ground onshore and offshore project infrastructure, no significant impacts to heritage setting (and associated importance) were identified and no further action is considered to be required. This is further evidenced in Section 21.6 and Appendix 21.4 and 21.5."	Noted. No further comment required.
10	Paragraph 30 has screened out the setting of various assets having taken into account the LVIA wireframed on potential impact on setting. The Council agrees with this.	The position of SNC is noted by the Applicant, and no further response is required.
11	While the majority of heritage assets are agreed to have no significant adverse effect, three assets remain: Church of St Peter, Church of Holy Cross and Church of St Mary Magdalen.	Noted. No further comment required.
12	With regard to these assets, St Peter's Church in Swainsthorpe due to the height of the tower shares intervisibility between it and the application site. However, with the distance between the two ; the nature of the proposed construction; and the ability to appreciate the significance of the asset from many other viewpoints it can be concluded that the impact on the setting of the asset is negligible or non-significant and therefore has been discounted in ES terms. This is agreed by the Council.	The position of SNC is noted by the Applicant, and no further response is required.
13	In regard to the Church of the Holy Cross, due to topography there may some intervisibility from the top of the tower and the application site, however having regard to the distance involved and the lack of intervisibility at a lower level due to topography, it is concluded that there will be no significant adverse impact on the setting.	Noted. No further comment required.

ID	Local Impact Report Comment	Applicant's Response
14	<p>Lastly in relation to the heritage assets, is the impact on the setting of The Church of St Mary Magdalen in Swardeston. Similarly, to the assets previously referred to, intervisibility between the asset and the application is only possible with the top of the church tower. Having regard to the separation distance between the two and the ability to appreciate the significance from many other viewpoints, there is considered to be no significant adverse impact on the setting of the church.</p>	<p>Noted. No further comment required.</p>
15	<p>The Council agrees with the above assessment of the designated heritage assets.</p>	<p>The position of SNC is noted by the Applicant. No further comment required.</p>
16	<p>In the Council's relevant representation, it raised that further clarification needed to be undertaken regarding the impact of the project on Ketteringham Hall Park which is a historic parkland and garden although not registered which is identified on Historic Environment record and can be considered a non-designated heritage asset.</p> <p>The applicant has acknowledged that the Park is a non-designated heritage asset and has responded to the Council advising that they are proposing a Trenchless route section of the cabling where the route crosses the historic parkland. The Council welcomes this approach.</p>	<p>The position of SNC is noted by the Applicant. No further comment required.</p>
17	<p>The Examining Authority has in its questions, has asked the Council to set our position on the significance of Ketteringham Hall Park as a non-designated asset and the features that contribute to its significance and setting. Also, in accordance with the NPPF, set out the harms weighed against the public benefits. Whilst the Council has responded to the question separately, it considered that the comments should also form part of this report.</p>	<p>Noted. No further comment required.</p>
18	<p>The Council would comment as follows:</p> <p>The area known as Ketteringham Hall Park is the historic parkland created for and associated with Ketteringham Hall. The present Hall, still standing, dates from the 1830's and is grade II. Parts of the park date from an earlier house on the site and appear on Faden's Map of 1797 although not the area</p>	<p>Noted. No further comment required.</p>

ID	Local Impact Report Comment	Applicant's Response
	<p>of the wider park area that the cable is running through. The Park is registered on the HER (NHER 44333) which states it was in existence by the late C18 and is shown in detail on C19 Maps. The historic remains of the parks now date from the C19 design which was the last major period of planting.</p>	
19	<p>The Council would comment as follows:</p> <p>The part of the park closer to the hall remains parkland in character, however the part of the park which the cable route runs through is a more peripheral parkland area that has been turned to arable. This area has been ploughed in the past and lost parkland trees within fields, although the plantations remain as parkland features including an oval clump which is referred to on the 1880s 1st edition OS map as 'The Oval' and a plantation area called "Norwich Hill". Even by the 1880s maps these areas were outside the main area of recreational parkland which are identified with different shading – however clearly these features are areas of estate tree planting associated with the hall. These plantation areas therefore remain of some heritage significance as remnants of historic plantation estate tree belt planting, and 'the oval' in particular as a distinctive parkland feature which might have had some purpose for the state such as being used for game bird shooting for example. In accordance with table 21-6 in the EIA, we would accord the remains of the park, being a non-designated heritage asset and not a designated heritage asset and of local importance only, to be of low significance.</p>	<p>The position of SNC is noted by the Applicant. No further comment required.</p>
20	<p>The Council would comment as follows:</p> <p>In terms of impact the electricity line will pass through the northeast of the park through a field and through plantation planting called on the OS 1880s Maps known as "The Oval" and "Norwich Hill" and which are both features of the parkland landscape. When passing through the cultivated area the cable will be trench dug, whereas it will be tunnelled at a depth of 10m under the plantation areas. This is shown on sheet 17 document 6.2.4. In the short term there will be some minor harm resulting from trench digging within the arable area which over time will revert back to the original appearance. Overall, therefore it is considered that there will be minor temporary short-term harm</p>	<p>The position of SNC is noted by the Applicant. No further comment required</p>

ID	Local Impact Report Comment	Applicant's Response
	and impact but no long-term harmful impact to the heritage asset so there is negligible short-term harm and no long-term harm. Paragraph 203 has been taken into account and it is considered that there is no requirement to carry out a planning balance assessment.	
Landscape and visual impact		
21	The key landscape and visual impacts will result from the laying of underground cabling in respect of the removal/loss of hedgerows, trees and the impact of the substation on the landscape character and visual amenities of the area. The proposed substation is located within the B1 Tas Tributary Farmland Landscape Character Area and to the west of the A1 Tas Rural River Valley. Policies DM4.5, DM4.8 and DM4.9 are relevant in the consideration of the proposal.	The Applicant confirms that landscape and visual matters relevant to policies DM4.5, DM4.8 and DM4.9 have been considered as part of the assessment of effects set out in ES Chapter 26 LVIA [APP-112].
22	Landscape and Visual Impact – The Council is satisfied that the work has been undertaken in accordance with the accepted industry guidance. Whilst there are some points of detail that may merit further scrutiny/debate, which is often the case when judgement is involved overall, generally we concur with the findings. Landscape and visual impacts, although linked, are treated separately.	The position of SNC is noted by the Applicant, and reflects the agreement reached and recorded between SNC and the Applicant in the SNC's SoCG [REP1-041] No further response is required.
23	For landscape impact, the greatest effect is on the site of the proposed substation; the LVIA concludes that the impact would be moderate significance adverse but that this would diminish outside the site where the effects would not be significant.	The position of SNC is noted by the Applicant, and reflects the agreement reached and recorded between SNC and the Applicant in the SNC's SoCG [REP1-041] No further response is required.
24	With regards to the visual impact, the most significant visual effects (major adverse) are from PRoWs, permissive bridleway and Gowthorpe Lane. The application submission advises: "The LVIA is based on a 'mitigation by design' approach, which means that landscape considerations have been accounted for as an integral part of the design process and therefore, appropriate landscape mitigation measures required to reduce the effect of the Proposed Development on landscape character and views have been incorporated into the design of the project and the assessment of effects, and it is assumed that this mitigation forms part of the final design." The Council agrees that the effect of the development will be major adverse. In respect of	SNC's position and comments are noted by the Applicant. <i>In accordance with the Applicant response above at (ID 8), "The final design of the substation will be informed by a colour study of the local landscape undertaken post-consent. The purpose of the colour study will be to inform the external appearance of the substation buildings and structures where it is reasonably practicable to do. This would include the identification of prominent colours within the existing landscape to inform a possible colour palette that could be applied to the substation design. It would support the</i>

ID	Local Impact Report Comment	Applicant's Response
	<p>mitigation, it is noted that additional planting to further screen the substation is proposed however, the planting will take a long time to establish. It is also considered that some of the degree of harm can be mitigated against through use of carefully considered materials and colours, as the Council has set out above.</p>	<p><i>integration of the substation into the local landscape and setting.</i>" [Section 7.6.1, APP-287].</p> <p>The Applicant can confirm that they will work with SNC to ensure that appropriate and sensitive materials (including colour) will be used in the detailed design development on the onshore substation in order to minimise the potential impacts that could arise on the surrounding landscape character and visual amenity within the local area.</p> <p>Requirement 10 of the draft DCO (Revision D) [document reference 3.1] requires details that details including the external appearance and materials for the substation will be submitted to and approved by the relevant planning authority. Requirement 10(5) of the draft DCO (Revision D) [document reference 3.1] requires that the details to be submitted must be in accordance with the Design and Access Statement (Onshore) [APP-287].</p>
25	<p>As the assessment work is limited to some degree by the fact that final form of the proposed substation is not known at this stage, the visualisations are based on a buildings modelled at 15m high and external equipment modelled at 30m high. From these it is clear that full visual mitigation from planting will not be possible, especially if the structures are to the maximum height modelled.</p>	<p>SNC's comment are noted by the Applicant. No further response is required.</p>
26	<p>In respect of the impact of the cable route, the Arboricultural Survey Report survey identifies the trees and constraints within parts of the DCO boundary, but not all. The Council considers that the tree/hedge details for the whole corridor should be provided, this should also include veteran trees which maybe outside the corridor but could still be impacted. Although it is accepted that currently no veteran trees/ancient woodland are shown to be removed or impacted on, as stated above we still do not have a survey for the whole route. The only veterans/ancients which have been picked up are those which are recorded on the Ancient Woodland/tree Inventory. The Council know that there are many smaller ancient woodlands and veteran trees which are not recorded, so again in the absence of a full survey we cannot say categorically that none will be lost or harmed by the proposed development. This applies to trees within the DCO boundary as well as those outside but still within buffer zones.</p>	<p>The Applicant advises that an arboricultural desk-study covering the onshore cable corridor has been completed and is presented in ES Appendix 20.15 Arboricultural Survey Report [APP-228]. The objective of the desk-study was to identify known protected and high value trees such as those with a TPO, those in a Conservation Area and/or veteran and ancient trees. This desk-study was supplemented by ground level arboricultural surveys within the North Norfolk AONB and the area around Norwich Main Substation. Both these areas were targeted due to the sensitivity of the landscape as a result of arboricultural impacts. It is worth noting that in addition to the arboricultural desk-study and targeted arboricultural surveys, aerial imagery was used to help refine the cable corridor route to avoid trees and woodland and ecological work including site surveys to identify trees with bat roost potential (which veteran and ancient trees often have) were undertaken. The information from the arboricultural desk-study, targeted arboricultural</p>

ID	Local Impact Report Comment	Applicant's Response
		<p>surveys, and ecological surveys was used in the site selection process to refine the cable route, minimising possible impacts to veteran and ancient trees from the outset through embedded mitigation (mitigation by design). Further arboricultural surveys will be undertaken prior to construction of the development. Requirement 11 (Provision of Landscaping) of the draft DCO (Revision D) [document reference 3.1] which requires the Applicant to submit a written landscape management plan (which accords with the outline landscape management plan) for that phase for approval by the relevant planning authority. Each landscaping scheme must include details of existing trees and hedges to be removed and details of existing trees and hedges to be retained, with measures for their protection during the construction period where applicable. This would take the form of a full arboricultural assessment.</p> <p>Important hedgerows and potentially important hedgerows are shown in the TPO and Hedgerow Plan [APP-017], which also identifies which of those will also require removal. Details of potentially important hedgerows and important hedgerows to be removed within the Order Limits are listed in the draft DCO (Revision D) [document reference 3.1, Schedule 16]. The Article detailing the undertaker's powers to fell or lop trees and remove hedgerows is set out in the draft DCO (Revision D) [document reference 3.1, Article 34].</p> <p>Mitigation measures in relation to hedgerows are detailed in the ES Chapter 20 Onshore Ecology and Ornithology [APP-106. para. 262-265]. The proposed approach to reinstating hedgerows post-construction is detailed in the revised OEMP (Revision B) [REP1-027 , Section 4.1] and the OLMP (Revision B) [REP1-027, para. 25, para 38], which are secured by Requirement 13 (Ecological Management Plan) and Requirement 11 (Provision of Landscaping) of the draft DCO (Revision D) [document reference number 3.1].</p>
27	<p>Currently there is not an assessment in line with the 1997 Hedgerow Regulations, in the absence of the information in terms of the 'importance' of hedgerows under the Hedgerows Regulations and assessment of trees implicated in the scheme, it is not possible to conclude on the impacts of the cable route. Our local plan policy DM4.8 presumes in favour of retention of</p>	<p>Important hedgerows and potentially important hedgerows are shown in the TPO and Hedgerow Plan [APP-017], which also identifies which of those will also require removal. Details of potentially important hedgerows and important hedgerows to be removed within the Order Limits are listed in the draft DCO (Revision D) [document reference 3.1, Schedule 16]. The Article</p>

ID	Local Impact Report Comment	Applicant's Response
	important hedgerows unless the need for, and benefits of, a development clearly outweigh their loss.	detailing the undertaker's powers to fell or lop trees and remove hedgerows is set out in the draft DCO (Revision D) [document reference 3.1, Article 34].
28	The Council understands that any section of hedgerow that has to be removed as part of the cabling will be replanted, which does lessen the concern about potential loss of 'important' hedgerows (especially if their status is solely because of an historic line). However, we need to be clear as to when replanting may not be possible, or when the 'importance' of a hedgerow cannot be safeguarded.	The Applicant has committed to replanting trees at a ratio of 1:1 outside the working easement and seeks to replace and enhance existing hedgerows as detailed in the OLMP (Revision B) [REP1-025] and OEMP (Revision B) [REP1-027].
29	From experience of other NSIPs in the Councils area, the Council would bring to the Examiners attention that the lack of a full survey's at the time of the assessment and consideration of the DCO has led to a greater loss of trees/hedges and woodlands at the Discharge of Requirements stage that had been accounted for during that determination. Not only has this put the Council in a difficult position wishing to protect its natural environment, but also has not enabled the full implications of the proposed development to be considered during the determination of the development, as it should be. Furthermore, the Council has had to deal with additional hedge/tree removal outside of the order limits to facilitate NSIP development, this makes it difficult to ensure adequate mitigation/compensation is provided.	Noted. Whilst the Applicant is sympathetic to the experience of SNC in relation to other NSIPs, the Applicant does not consider that those circumstances are relevant to the Examination of SEP and DEP. The Applicant refers to the responses at ID27 and ID28. The Applicant considers that the survey work carried out to date is appropriate and that suitable mitigation has been provided and secured.
30	It is also noted as above that the cable route is passing through Ketteringham Hall Park and through some planted plantation belt historic feature "The Oval". The applicant has responded to the Council advising that they are proposing a Trenchless route section of the cabling where the route crosses the historic parkland. The Council welcomes this approach.	SNC's acceptance of the Applicant's approach is noted. No further response required.
31	The Council would bring to the Examiners attention the location of the Hornsea Project Three substation, the Energy Balancing Infrastructure, the infrastructure for the provision and storage of energy; and the East Anglia GREEN electricity pylons as set out in the relevant development projects. The Council continues to be concerned, the combined impacts of these developments proposed and consented, which are located around Norwich Main, together with this proposed substation, will have on the District's rural landscape.	SNC's comments are noted by the Applicant. In relation to the ES Chapter 26 LVIA [APP-112] and its approach to a CIA, the Applicant has assessed schemes identified as being relevant to landscape and visual receptors. The LVIA's approach its CIA is set out in Section 26.4.4, paragraphs 121 to 126 [APP-112]; and the LVIA's CIA is set out in Section 26.7, paragraphs 472 to 491 [APP-111], and considers the following schemes:

ID	Local Impact Report Comment	Applicant's Response
		<ul style="list-style-type: none"> • Hornsea Project Three Offshore Wind Farm (in relation to the onshore cable corridor and substation); • Norfolk Vanguard (in relation to the onshore cable corridor); • Norfolk Boreas Offshore Windfarm (in relation to the onshore cable corridor); and • EAG Energy Enablement (GREEN) Project (in relation to the onshore cable corridor and substation).
Noise and Pollution		
32	The key noise and pollution considerations are the impacts of the construction of and the operation of the proposal on the amenities on local residential in respect of air quality, water quality, noise and vibration, light pollution etc. Policy DM3.13 and DM3.14 are relevant to the consideration of the proposed development.	Noted. No further comment required.
33	The Councils considers that the documentation would indicate that the proposal could take place (both the construction and operational phase) without an unacceptable impact on residents, if managed and operated appropriately.	Noted. No further comment required.
34	In view of the above, with regards to specified works to be undertaken issues relating to Control of Noise, Air Quality, Artificial Light, Waste Management, Pollution Prevention, Contamination Assessment and Mitigation and Working Hours are adequately covered by the Requirements in the Draft DCO. The Council is in general agreement and appreciates that the exact wording of the listed documentation/requirements will be subject to further discussion with the applicants.	Noted. No further comment required.
Ecology		
35	Policy 1 of the JCS requires the development to both have regard to and protect the biodiversity and ecological interests of the site and contribute to providing a multi-functional green infrastructure network. Policy DM4.4 looks	Noted. No further comment required.

ID	Local Impact Report Comment	Applicant's Response
	for new development sites to safeguard the ecological interests of the site and to contribute to ecological and Biodiversity enhancements.	
36	The Council considers that all developments should take all reasonable opportunities to enhance biodiversity to achieve a net gain for nature. To achieve this the application should adhere to the mitigation hierarchy (providing effective avoidance, minimisation and compensate measures) and deliver biodiversity net gains.	<p>The Applicant acknowledges SNC's comment and would like to signpost to the Outline BNG Strategy [APP-306] and Initial BNG Assessment [APP-219]. In addition, the Outline Landscape Management Plan (Revision B) [REP1-025] includes information on BNG. These plans are secured by Requirements 13 (Ecological Management Plan) and 11 (Provision of Landscaping) of the draft DCO (Revision D) [document reference 3.1] respectively. Further to this, Requirement 12 (Implementation and Maintenance of Landscaping) of the draft DCO (Revision D) [document reference 3.1] requires the applicant to carry out landscaping in accordance with the plan approved in Requirement 11.</p> <p>The Applicant will consider opportunities to deliver BNG which could include forthcoming nature recovery strategies targeting new sites, features or habitats as priorities for enhancement.</p>
37	The scope for terrestrial ecological surveys has been previously agreed and surveys of 90% of the route were undertaken between 2020-2021 by suitably qualified and experienced ecologist in line with best practice guidelines. The Council would also encourage the applicant to update the desk top study as our County Wildlife Sites were recently updated.	<p>The Applicant acknowledges SNC's comment Regarding County Wildlife Sites (CWS) and has committed to completing an updated desk study including data search with the Norfolk Biodiversity Information Service (NBIS) to obtain up-to-date information on any CWSs within the Order Limits and surrounding 2km area, as confirmed within Table 2 of the OEMP (Revision B) [REP1-027].</p> <p>The Applicant acknowledges SNC's comment and will continue to explore further opportunities to avoid/minimise impacts in partnership with other schemes in the area.</p>
38	The cable route has been designed to avoid impacts where possible and further micro-siting is expected at the detailed design. The Council would encourage the applicant to explore further opportunities to avoid/minimise impacts in partnership with other schemes in the area as the schemes develop and are delivered.	Noted. No further comment required.
39	The ES provides an outline for mitigation and the Council welcome the use of native species of local provenance and biodegradable tree guards. The proposed mitigation will be reviewed and adjusted as the design progresses.	The Applicant will consider available mitigation options that avoid impacts on species such as bats). The precise scope of mitigation measures will be informed by the results of pre-construction surveys and (where available) on

ID	Local Impact Report Comment	Applicant's Response
	<p>Consideration should be given to the use of moveable 'hedges' which could be placed within hedge gaps at night and removed the following day, to provide for continued connectivity. These have been proposed and will also be trailed by another linear scheme.</p>	<p>studies into the effectiveness of newly emerging mitigation techniques, such as moveable hedges.</p>
40	<p>Should reptile translocation be required, the translocation site will need to be identified, secured, and maintained for at least the lifetime of the scheme.</p>	<p>Noted. The only reptile site at which movement of reptiles may be necessary is Hickling Lane (near the onshore substation), where reptiles would be moved out of the construction footprint and into suitable adjacent habitat which is outside the construction footprint but still inside the Order Limits and part of the same unit of reptile habitat. In this respect, movement of reptiles would be micro-scale and within the same 'site', so translocation to different/distant sites is not proposed. The areas to which reptiles would be moved is known to be suitable for reptiles, it is within the Order Limits and is therefore secured for use by the Applicant.</p>
41	<p>The applicant is committed to deliver biodiversity net gain (BNG) and an Initial Biodiversity Net Gain Assessment has been undertaken. At the present time it is anticipated that the scheme will deliver a 0.50% net loss in habitats, and a 3.02% net gain in hedge units. Because it is not possible to offset the loss of habitat units against the gain in hedge units additional work will be required to deliver net habitat gains to ensure the scheme complies with National Planning Policy. With regards to the delivery of BNG we would encourage consideration of the Local Nature Recovery Strategy which should be published by November 2023, and compliance with best practice guidelines to ensure that BNG is delivered post-construction.</p>	<p>As outlined within the Outline BNG Strategy [APP-306], the calculations at this stage account almost entirely for the habitat losses associated with the onshore elements of SEP & DEP, because these are broadly known and quantifiable. However, the majority of gains in the form of habitat creation are not yet confirmed (e.g. agreed with stakeholders) so cannot be included, hence the preliminary calculations show net losses for Habitats Units and Rivers and Streams Units. Once habitat enhancements are agreed with relevant stakeholders these will be incorporated into the BNG Metric calculations.</p> <p>It is acknowledged that BNG does not allow offsetting of losses from different unit types (Habitat Units cannot be equated/offset against Hedgerow Units, for example).</p> <p>The Local Nature Recovery Strategy will be reviewed and considered, once available as part of the BNG strategy and also ecological compensation and enhancement measures.</p>
42	<p>Letters of No Impediment (LoNI) have been received from Natural England for bats and badgers and great crested newts will be licenced under the District Level Licensing Scheme. No other licences are anticipated to be required based on the information obtained to date although additional ecological surveys will be undertaken on the remaining 10% of the route to</p>	<p>The Applicant is committed to delivering best practice in relation to minimising impacts on great crested newts and will be delivering Reasonable Avoidance Measures that go beyond the requirements of the Natural</p>

ID	Local Impact Report Comment	Applicant's Response
	inform the detailed design. In line with best practice Reasonable Avoidance Measures should be employed to minimise impacts on great crested newts and we would encourage the design of a wildlife friendly surface water drainage scheme, with Sustainable Urbans Drainage Systems designed for the benefit of wildlife.	England District Level Licence. Those Reasonable Avoidance Measures are listed in the updated OEMP (Revision B) [REP1-027, Section 2.3.7].
43	Again, as part of the Council's experience in Discharging Requirements, it is evident that the cabling routes have an impact that South Norfolk need to have regard to for Pink-footed Geese. This impact results from the grazing of the Pink-footed Geese on post-harvest cereal stubs, sugar beet tops etc. A Pink-footed Geese management plan will need to be a requirement of any consent which should set out a clear understanding of their impact and protection needs during the winter months when vegetation removal for the development is most likely to happen.	The Applicant has received the guidance from Natural England regarding pink footed geese and is developing a strategy accordingly and in consultation with Natural England.
44	Overall, following mitigation which will be secured via the DCO, the scheme is predicted to have negligible or minor adverse impacts on ecological receptors i.e. the impacts would have minimal effect at the lower end of the scale, but could adversely affect an ecological receptor but would not adversely affect the integrity or conservation status at the other end. The ES has addressed inter-relationships between ecology, water and air, noise, and vibration.	Noted. No further comment required.
Socio-economic and community matters		
45	In general, the District Council is supportive of the project, recognising its importance in relation to the diversification of UK energy supplies; the contribution the projects will make to the achievement of the national renewable energy targets toward net zero; the reduction of the UK's reliance on imported energy and increased energy supply security; and potential contribution to the national and local economy. South Norfolk Council continues to raise concerns that there will be no direct local benefit in terms of electricity supply, given that South Norfolk is hosting a number of NSIP's and infrastructure for the provision and storage of energy.	Noted. No further comment required.
46	The economic benefits in terms of investment and job creation are welcomed.	Noted. No further comment required.

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Consideration of the draft order		
47	With regards to the Draft Development Consent Order, the Council in general terms does not wish to raise any concerns, however as set out in our Statement of Common Ground and in response to the Examining Authority's questions there are issues and concerns relating to specific requirements/conditions. The Council wishes to reserve its position due to ongoing discussions with the applicant.	Noted. No further comment required.

References

BEIS (2023). Energy Security Bill Policy Statement. Offshore Wind Environmental Improvement Package Measures. Policy Statement Offshore Wind Environmental Improvement Package Measures (publishing.service.gov.uk)