



# Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects

The Applicant's comments on North Norfolk District  
Council's Response to the Examining Authority's First  
Written Questions

**Revision A**

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<b>Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects Examination submission</b>	
<b>The Applicant's Comments to North Norfolk District Council's Responses to the Examining Authority's First Written Questions</b>	
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## Table of Contents

<b>1</b>	<b>The Applicant's comments to Responses to the Examining Authority's First Written Questions</b> .....	<b>4</b>
	<b>References</b> .....	<b>35</b>

## Table of Tables

Table 1	The Applicant's comments to North Norfolk District Council responses to the Examining Authority's First Written Questions .....	5
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## **1 The Applicant's comments to Responses to the Examining Authority's First Written Questions**

1. Following the issue of the First Written Questions by the Examining Authority (ExA) to Equinor New Energy Limited (the Applicant) and other Interested Parties, the Applicant and Interested Parties have subsequently responded to each of those relevant questions. The Applicant has chosen to comment on the responses provided by North Norfolk District Council, detailed in **Table 1** below.

**Table 1 The Applicant's comments to North Norfolk District Council responses to the Examining Authority's First Written Questions**

ID	Question	North Norfolk District Council Responses	Applicant's Comment
<b>Q1.1 General and Cross-topic Questions</b>			
<b>Q1.1.1 Planning Policy</b>			
Q1.1.1.1	Planning Policy Set out whether, in your view: a) There are any areas of where the Proposed Development conflicts with the aims and objectives of the designated NPSs, specifically NPS EN1 and NPS EN3; b) The representation of the Local Plans and policies [APP-088] is accurate or, if not, provide updated information; c) Any other policy documents are considered important and relevant to the Examination. d) Applicant, provide a complete summary in tabular form to demonstrate how it is considered the Proposed Development accords with all relevant paragraphs of the designated energy NPSs.	a) To be set out as part of Local Impact Report and Statement of Common Ground between Applicant and NNDC  b) To be set out as part of Local Impact Report and Statement of Common Ground between Applicant and NNDC  c) To be set out as part of Local Impact Report and Statement of Common Ground between Applicant and NNDC  d) N/A	No comment.
<b>Q1.1.2 Planning Permissions</b>			
Q1.1.2.1	Planning Permissions Please update the Examination as to whether any new permissions have been granted, or new projects pending decision,	None	No comment.

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	that require consideration within the cumulative impact assessment.		
Q1.1.2.2	<p>Planning Applications</p> <p>Have any proposed works, to date, been subject to planning applications under s78 of the TCPA1990 (as amended) and, if so, where are they and what is their status?</p>	None at the time of Deadline 1 submission.	No comment.
<b>Q1.1.4 Miscellaneous</b>			
Q1.1.4.1	<p>Review of Energy NPSs</p> <p>In light of the ongoing review of the energy NPSs, would any aspect of the Proposed Development be in conflict with, or require revision to align with, the revised energy NPSs? The ExA notes that the Applicant's assessment [APP-285, Section 6] but invites any further comments from the Applicant.</p>	No comment	No comment.
Q1.1.4.2	<p>Availability of Resources for NSIP casework</p> <p>Are you confident that you have, or shortly will have, sufficient resources to deal with the NSIP-related workload that will be associated with the Proposed Development during the examination and recommendations phases and that would be associated with the Proposed Development if the SoS made an order granting development consent?</p>	<p>Resource concerns were outlined at the Preliminary Meeting on 17 Jan 2023.</p> <p>Local Authority resources are already considerably stretched. Local Authorities receive no financial recompense for the officer time/cost involved in participating in NSIP examinations and this means that, in order to participate in the NSIP regime, existing resources are taken away from other LPA projects and statutory tasks.</p> <p>The ExA need to be aware that, given other work pressures, there is limited ability for LPA officers to spend significant time reading</p>	No comment.

ID	Question	North Norfolk District Council Responses	Applicant's Comment
		<p>voluminous documents and supporting information that accompany NSIP projects. It is therefore important that LPA Officer time is managed appropriately given a wide variety of workload demands beyond the NSIP regime. This may mean that responses to written questions from the ExA to Local Authorities may have to be brief and to the point. For other NSIP projects, Local Authorities have worked towards securing a Planning Performance Agreement to recover some of the costs involved in discharging DCO Requirements. This is helpful but does not address the upfront costs associated with NSIP examination and this is often the stage where value can best be added to a DCO but where time and available resources are limited.</p>	
<p><b>Q1.2.4 The Need for this type of Energy Infrastructure, and specifically for the Proposed Development</b></p>			
<p>Q1.2.4.1</p>	<p>Need for Offshore Wind farm</p> <p>The assessment of need for the Proposed Development has been set within the context of the ongoing need for electricity generation in the U.K. [APP-285, Section 4].</p> <p>However, there are other types of infrastructure that are supported by NPS EN-1 that can meet the need for electricity generation. Justify the need for the specific type of infrastructure (offshore windfarm) for electricity generation as opposed to or alongside other types of infrastructure. And explain, how the</p>	<p>NNDC is fully supportive of offshore renewable energy as a way to secure clean renewable energy.</p> <p>The Applicant is better placed to justify their proposal but NNDC consider it would be entirely remiss for the ExA to conclude that offshore wind is not needed. It is needed, but the key question for the ExA is how the DCO can positively manage any adverse impacts and maximise the benefits in delivering renewable energy.</p>	<p>Please see <a href="#">Appendix B.1 – Supporting Documents for the Applicant's Responses to the Examining Authority's First Written Questions [REP1-038]</a>.</p>

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	<p>Proposed Development specifically satisfies the need for offshore windfarms for electricity generation. Explain in the context of NPS EN-1, including Paragraph 3.2.3: "The weight which is attributed to considerations of need in any given case should be proportionate to the anticipated extent of a project's actual contribution to satisfying the need for a particular type of infrastructure"; and Paragraph 3.3.4: "There are benefits of having a diverse mix of all types of power generation. It means we are not dependent on any one type of generation or one source of fuel or power and so helps to ensure security of supply."</p>	<p>NNDC consider the public benefits will most certainly outweigh the adverse impacts.</p>	
<b>Q1.3. Benthic ecology, Intertidal, Subtidal and Coastal effects</b>			
<b>Q1.3.1 Effects on Marine Life and Benthic Habitats including through Cable Installation Methods</b>			
<p>Q1.3.1.1</p>	<p>Intertidal and Subtidal areas            Are you content with the Applicant's assessment of the adverse effects of the use of long HDD to bring the export cables ashore at landfall [APP- 094]? Explain with reasons.</p>	<p>NNDC is fully supportive of the use of long HDD to bring cables onshore. This approach is much preferred to the impact of open trenching across Weybourne beach which would likely impact beach stability and also lead to extended footpath closures during construction / installation.</p>	<p>The Applicant acknowledges NNDC's comment.</p>
<b>Q1.6.5 Effects from emissions on air quality</b>			
<p>Q1.6.5.4</p>	<p>Road Traffic Emissions Assessment Methodology            When considering construction road vehicle exhaust emissions, the assessment [APP- 132] sets out that</p>	<p>a) No comment            b) N/A</p>	<p>No comment.</p>



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	<p>“Peak construction flows were not used in the assessment, as peak construction would occur over a 1 or 2 month period (at worst) and using these to derive AADT across a full year would unrealistically inflate the impacts of construction generated traffic. The use of average construction flows was deemed to be robust and more appropriate representation of construction impacts from traffic over an annual period, and aligns with the requirement for use of AADT flows”.</p> <p>a) LAs do you agree with this approach?</p> <p>b) Applicant, provide further justification for this approach.</p> <p>The ES [APP-132, Paragraph 157] notes that the statutory designated Railway Road and Gaywood Clock AQMAs in King's Lynn, declared in 2003 and 2009 respectively for exceedances of the NO2 annual mean, are located as close as 400m from road links likely to be used by project. It is assumed that due to this distance there will be no significant effects. Provide further justification and evidence to support this assertion.</p>		
<b>Q1.6.6 Adequacy of the Outline Code of Construction Practice</b>			
	Outline Code of Construction Practice	a) N/A	No comment.

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	<p>The OCoCP [APP-302, Table 1-1] sets out a number of EMPs that will form part of the final CoCP and will be prepared, submit and approved post-consent.</p> <ul style="list-style-type: none"> <li>a) A pre-construction drainage plan, a scheme to deal with the contamination of any land (including groundwater), a Materials Management Plan, Soil Management Plan, a Site Waste Management Plan, hydro-fraction surveys (for bentonite breakout) and a Construction Surface Water Drainage Plan are all referred to in the main text of the OCoCP but are not included in Table 1-1. Why is this?</li> <li>b) Confirm the status and origin of EMPs listed in Table 1-1.</li> <li>c) The OCoCP refers to Construction Method Statements. What will these include?</li> <li>d) Justify the level of detail and content provided to date within the suite of EMPs.</li> <li>e) Is it possible for the ExA to be sure that such EMPs will be successful in mitigating any impacts without seeing more detail?</li> </ul>	<ul style="list-style-type: none"> <li>b) N/A</li> <li>c) N/A</li> <li>d) N/A</li> <li>e) N/A</li> <li>f) NNDC will be guided by the ExA.</li> </ul>	

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	f) Local Authorities and NFU are there any management plans that you consider are crucial to review during the Examination? Explain with reasons.		
<b>Q1.8.2 Affected Persons' Site-specific Issues</b>			
Q1.8.2.4	Protected Characteristics a) Applicant, further to the ASI [EV-004], the ExA believes one or more residents of the Old Orchard House may have protected characteristics in line with s4 of the Equality Act 2010 [RR-124]. Explain what special consideration has been given. b) Applicant and NNDC, to confirm (without specifying any personal details) if protected characteristics of s4 of the Equality Act 2010 would trigger the Public Sector Equality Duty. c) Yvonne Odrowaz-Pieniazek, provide any further information or evidence that you may have to demonstrate that the exposure to EMF may be greater than the calculations provided by the Applicant.	a) N/A b) This is a matter for the ExA to consider as determining authority. c) N/A	No comment.
<b>Q1.10. Design</b>			
<b>Q1.10.1 Design Principles</b>			

ID	Question	North Norfolk District Council Responses	Applicant's Comment
Q1.10.1.1	<p>Suitability and Adequacy of the Applicant's Approach to Design</p> <p>a) Has the Applicant satisfied the requirements set out in NPS EN-1 Section 4.5 in relation to sensitivity to place and contributing to the quality of the area in which the infrastructure would be located?</p> <p>b) Clarify, with reasons, whether you believe that design outcomes relating to proposed elements of infrastructure, structure and buildings proposed within the order limits, flood risk, landscape and ecology are sufficiently well developed within the application documents.</p> <p>c) Confirm, with reasons, whether you believe that noise mitigation measures and construction structures related to the construction compound should also be considered as part of the Applicant's approach to design. Applicant may respond.</p>	<p>a) N/A</p> <p>b) No comment</p> <p>c) See comments in SoCG on noise mitigation.</p>	No comment.
<b>Q1.10.2 Design Development Process</b>			
Q1.10.2.1	<p>Design Development Process</p> <p>a) Provide further detail of the structured framework within which the Applicant has carried out its</p>	<p>a) N/A</p> <p>b) N/A</p> <p>c) N/A</p>	No comment.

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	<p>design process to date, giving detail of the key milestones which have been reached within that process and setting out which elements of the overall design have been fixed at this stage.</p> <p>b) Set out the main stages of the remainder of the design process required to fully develop the Applicant's design of the Proposed Development in the event that its application is granted Development Consent, giving an indication of expected deliverables and timescales wherever possible and indicate how this process will be secured within the draft DCO.</p> <p>c) Provide an outline description of the design professional disciplines that have contributed to the Applicant's design process to date.</p> <p>d) Set in further detail how the Applicant's design principles – established in its Design and Access Statement [APP-287] – are secured within the draft DCO</p>	<p>d) This is a matter for the Applicant to explain.</p>	
Q1.10.2.2	<p>Design Review</p> <p>Comment, with reasons, if the Applicant should seek independent design review</p>	<p>This is a matter for the ExA to determine.</p>	<p>No comment.</p>

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	advice in line with the policy recommendation in NPS, Paragraph 4.5.5.		
<b>Q1.11. Draft Development Consent Order</b>			
<b>Q1.11.1 General</b>			
Q1.11.1.3	<p>Discharging Requirements and Conditions</p> <p>Applicant, provide a list or table of specifically named authorities and undertakers that are relevant in the dDCO for each and every reference to the following. Please list separately, instances where any of the following, for example 'local authority', refers to different body or bodies.</p> <ul style="list-style-type: none"> <li>• highway authority</li> <li>• lead local flood authority</li> <li>• relevant planning authority</li> <li>• local planning authority</li> <li>• street authority</li> <li>• drainage authority</li> <li>• sewerage undertaker</li> <li>• local authority</li> <li>• acquiring authority</li> <li>• public authority</li> <li>• Crown authority</li> <li>• approving authority</li> </ul>	N/A	No comment.
<b>Q1.11.2 Definitions</b>			

ID	Question	North Norfolk District Council Responses	Applicant's Comment
Q1.11.2.2	<p>Commence</p> <p>a) How would the activities currently excluded in the definition of commence be controlled, monitored and mitigated, given the CoCP would not be approved and enforceable (in line with R19) when the works excluded from the definition of commence may need to take place?</p> <p>b) Local Authorities, do you have concerns about works being delivered without any controls, in particular activities such as diversion and laying of services, the erection of any temporary means of enclosure, and the erection of welfare facilities?</p> <p>c) Local Authorities, are there other activities excluded from the definition of commence that you consider should be controlled through a management plan? Explain with reasons.</p> <p>d) Applicant and Local Authorities, is there a need for a definition for pre-commencement works and an accompanying management plan?</p> <p>e) Are there any concerns from any party about the scope, breadth and definition of commencement</p>	<p>a) In theory the activities shouldn't need or require to be controlled, monitored or mitigated because they should fall outside of the definition of development. However, to overcome the concern it may be as straightforward as amending the wording of Requirement 19 to say '19 – (1) No phase of the onshore works (including any associated activities or operations excluded from the definition of "commence") may commence or take place until a code of construction practice (which must accord.....'</p> <p>b) No</p> <p>c) No</p> <p>d) This is, in effect, covered in the definition of "commence" via the exclusions.</p> <p>e) No, but see answer to a) as a possible remedy.</p>	<p>NB:</p> <p>a) Appendix B.11 of the <b>Supporting Documents to The Applicant's Responses to the Examining Authority's Second Written Questions</b> [document 16.2.1] includes a table detailing all the pre-commencement works. It includes details of the pre-commencement works which are subject to controls, together with an explanation as to what those controls are and how they are secured within the draft DCO, and those which are not subject to controls, together with an explanation as to why controls are not necessary. This has been forwarded to NNDC for comment.</p> <p>b) Noted</p> <p>c) Noted</p> <p>d) Agreed, however please see the Applicant's response to Q2.11.2.2(b) within <b>The Applicant's Responses to the Examining Authority's Second Written Questions</b> [document reference 16.2] which confirms that the Applicant has now included a separate definition of pre-commencement works within the draft DCO.</p> <p>e) Noted</p>

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	with the Order or its accompanying dDMLs? If so, explain what they are and the implications that you use the ExA to take account of.		
Q1.11.2.3	<p>Maintain</p> <p>Justify if the drafting "to the extent assessed in the environmental statement" is an adequate bar in the definition of maintain to limit maintenance activities authorised under the dDCO and the dDMLs to those that are assessed within the ES.</p>	<p>There appears to be an inherent contradiction between how the definition of 'maintain' is applied to details approved as part of Requirement discharges.</p>	<p>The Applicant understands that there is a concern that it will not maintain works that may be implemented but have not been considered within the ES.</p> <p>The Applicant clarifies only activities assessed within the ES would be constructed and operated under the DCO. The Applicant refers to its response to Q1.11.2.3 which states that 'if maintenance activity is proposed during the operation which has not been covered by the ES assessment, the wording makes clear that it cannot be treated as being within the scope of the consent. Activities outside those assessed could not be undertaken without a modification to the DCO or a further consent' in the <a href="#">Applicant Responses to the Examining Authority's First Written Questions</a> [REP1-036].</p>
<b>Q1.11.4 Schedules</b>			
Q1.11.4.2	<p>Further Associated Development</p> <p>Are you satisfied that all instances of further associated development in connection with Work Nos. 1B to 7B, Work Nos. 8B to 22B, Work Nos. 3C, 4C, 5C and 7C and Work Nos. 8C, 9C, 12C, 15C, 16C and 17C are controlled</p>	<p>NNDC assess these 'further associated works' as a catch-all for associated activities that fall within the scope of the rochdale envelope akin to ancillary related development.</p> <p>There are clear benefits to allowing some flexibility within the project without requiring the need for additional consents, provided the</p>	<p>The Applicant acknowledges NNDC's comment.</p>



ID	Question	North Norfolk District Council Responses	Applicant's Comment
	adequately by the provisions in the dDCO?	<p>impact of such work has been assessed within the environmental statement.</p> <p>The alternative would be to rigidly control the project and this could require additional consents and add unnecessary bureaucratic burdens which may not be in the wider public interest.</p>	
Q1.11.4.3	<p>Ancillary Works</p> <p>Are you satisfied that all instances of ancillary works are controlled adequately by the provisions in the dDCO?</p>	Yes – see above	No comment
Q1.11.4.5	<p>Accuracy of all Schedules</p> <p>Check the Schedules in the dDCO for accuracy and provide the ExA with suggested corrections and amendments.</p>	<p>See response to Q1.11.2.2 a) for suggested amends to Requirement 19. Aspects of this wording might be applicable to other Requirements where submission and approval of final documents may be necessary before any aspect of work begins.</p> <p>NNDC reserves the right to suggest further amendments to the dDCO during the course of the examination process.</p>	The Applicant acknowledges NNDC's comment.
<b>Q1.13. Habitats and Ecology Onshore</b>			
<b>Q1.13.1 Effects on European Designated Sites and Sites of Special Scientific Interest</b>			
Q1.13.1.1	<p>Air Quality and Screening of Ecological Sites</p> <p>Can you confirm if the approach to the selection of all the relevant European sites, the scopes of the in-combination assessment, the assessments and the</p>	See Statement of Common Ground submitted at Deadline 2.	No comment.

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	conclusions reached by the Applicant is acceptable [APP-108, paragraph 138 (though not limited to that paragraph only)].		
<b>Q1.13.2 Effects on Protected and Priority Species</b>			
Q1.13.2.4	<p>Weybourne Cliffs</p> <p>It is identified that populations of sand martins nest within the cliffs [APP-106]. Would noise and vibration from the landfall construction operations, with particular regard to vibrations from the HDD, have any effect upon the integrity of the cliffs or the living conditions of the sand martins such that nesting could be abandoned?</p>	On reflection, NNDC consider this to be a matter for Applicant and RSPB to respond.	The Applicant acknowledges NNDC's comment.
<b>Q1.16. Land Use</b>			
<b>Q1.16.2 Soils and Soil handling, Ground Conditions, Contamination and Minerals</b>			
	<p>Contaminated Land – Approach</p> <p>The ES [APP-103] notes that potential areas of contamination cannot be avoided. This includes areas such as the disused airfield at Brandiston, railways lines (both historical and active) former pits and historic tanks. The assessment also identifies that targeted ground investigations may be required.</p> <p>a) What options were considered in the optioneering stage to avoid areas of potential contamination (i.e. why did the onshore cable</p>	See Statement of Common Ground submitted at Deadline 2.	No comment.

ID	Question	North Norfolk District Council Responses	Applicant's Comment
	<p>corridor have to go through Brandiston Airfield)? This was not specifically mentioned in ES Chapter 3.</p> <p>b) Are the Order limits and cable corridor widths such that any dense areas of contamination within these areas could be bypassed, by micro- siting the cables away from them (i.e. if there is an aeroplane fuel leak contained in one part of the cable corridor that could be diverted around)?</p> <p>c) Are the EA and LAs content that targeted ground investigations have not yet been undertaken and would be subject to post-consent processes?</p>		
<b>Q1.17. Landscape and Visual Effects</b>			
<b>Q1.17.1 Effect on Landscape Character and Views</b>			
	<p>LVIA Methodology</p> <p>The ES states that the LVIA was undertaken both in accordance with GLVIA3 and with direct input from local authorities as to the location and frequency of viewpoint analysis [APP-112].</p> <p>a) In this context, can you confirm that the selection of receptors</p>	<p>See Statement of Common Ground submitted at Deadline 2.</p>	<p>The Applicant notes that the <b>SoCG</b> [REP2-048] reflects the agreement reached between NNDC and the Applicant on landscape and visual matters related to 'Policy and Planning' (see ID 1); the 'Baseline Environment' (see IDs 2 to 6); and 'Assessment Methodology' (see IDs 7 to 17).</p> <p>Specifically, NNDC agree with the receptors selected, their sensitivity, the process used in that selection and the LVIA's study area.</p>

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	<p>(and their sensitivity) is reasonable and that there are no outstanding concerns regarding the process that the Applicant undertook (notwithstanding you may disagree with its results and conclusions).</p> <p>b) Are you satisfied with the study areas adopted by the Applicant for the onshore substation and the landfall site?</p> <p>c) If not, please set out the reasons for this position and indicate what additional areas should be included and the reasons why these areas should be included.</p>		
Q1.17.1.9	<p><b>Residential Receptors</b></p> <p>The Applicant notes that a RVAA has not been undertaken because the nearest receptors would fall below the relevant threshold [APP-112, paragraphs 117-120].</p> <p>a) LAs, is this a reasonable approach?</p> <p>b) LAs, what weight should be given to private views from residential properties in the Examination, in the ExA's considerations and in the SoS's decision? Applicant may respond.</p>	See Statement of Common Ground submitted at Deadline 2.	<p>The Applicant notes that the <b>SoCG</b> [REP2-048] reflects the agreement reached between NNDC and the Applicant on matters related to a RVAA at ID 14, where it is agreed that a RVAA is not necessary.</p> <p>The Applicant also refers to its response for Q1.17.1.19 in the <b>Applicant Responses to the Examining Authority's First Written Questions</b> [REP1-036].</p>

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Q1.17.1.13	<p>The Applicant's Assessment of Effects within its LVIA Documents</p> <p>Please set out, or provide signposting to where you have set out, any areas of disagreement with the Applicant's baselines, methodologies and assessment of effectiveness of proposed mitigation measures within its Landscape and Visual Impact Assessment [APP-112]. If no areas of disagreement exist, please indicate this with reasons explaining why you believe the application documents provide satisfactory information on this topic.</p>	See Statement of Common Ground submitted at Deadline 2.	<p>The Applicant notes that the <b>SoCG</b> [REP2-048] reflects the agreement reached between NNDC and the Applicant on landscape and visual matters related to 'Policy and Planning' (see ID 1); the 'Baseline Environment' (see IDs 2 to 6); and 'Assessment Methodology' (see IDs 7 to 17).</p> <p>Regarding matters related to the "assessment of effectiveness of proposed mitigation measures within its Landscape and Visual Impact Assessment [APP-112]"; the Applicant notes that NNDC requires more time to review and form a position and this matter is 'In Discussion', as stated in the <b>SoCG</b> [REP2-048].</p>
<b>Q1.17.3 Effectiveness of mitigation proposals</b>			
Q1.17.3.4	<p>Extent of Mitigation</p> <p>Would the mitigation planting illustrated by the Applicant be effective in reducing the magnitude and significance of the visual effect of the Proposed Development? If not, why not? What other steps should be considered in order to provide the necessary change in magnitude and significance of the visual effect of the onshore substation buildings and/ or structures?</p>	See Statement of Common Ground submitted at Deadline 2.	<p>The Applicant notes that the <b>SoCG</b> [REP2-048] reflects NNDC's request for more time in relation to their position on the Applicant's mitigation proposals (see ID 20 to 22).</p> <p>The Applicant also notes that this question (Q1.17.3.4) relates to Q1.17.1.13 above.</p>
Q1.17.3.6	<p>Outline Landscape Management Plan</p> <p>Are you satisfied that the details of location, number, species, size and density of proposed planting around the onshore substation need not be</p>	See Statement of Common Ground submitted at Deadline 2.	<p>The Applicant notes that the <b>SoCG</b> [REP2-048] reflects the agreements reached between NNDC and the Applicant on matters related to the <b>Outline Landscape Management Plan (Revision B)</b> [REP1-025] at ID 20 to 22.</p>

ID	Question	North Norfolk District Council Responses	Applicant's Comment
	considered during the Examination [APP-303]?		NNDC are to confirm whether they are satisfied or not that details outlined need not be considered during the Examination.
<b>Q1.18 Seascape and Visual Effects</b>			
<b>Q1.18.1 Effect on Seascape Character and Views</b>			
	<p>SLVIA Methodology</p> <p>The ES states that the SLVIA was undertaken both in accordance with direct input from local authorities as to the location and frequency of viewpoint analysis [APP-111]. In this context, can you confirm that the receptors (and their sensitivity) are reasonable and that there are no outstanding concerns regarding the process that the Applicant undertook (notwithstanding you may disagree with its results and conclusions).</p>	See Statement of Common Ground submitted at Deadline 2.	The Applicant notes that the <b>SoCG</b> [REP2-048] reflects the agreement reached between NNDC and the Applicant on seascape and visual matters related to 'Policy and Planning' (see ID 1); the 'Baseline Environment' (see IDs 2 to 5); and 'Assessment Methodology' (see IDs 6 to 17).
<b>Q1.18.3 Effects on Designated and Historic Landscapes</b>			
Q1.18.3.1	<p>The Existing Baseline and its Effect on the Statutory Purpose of the NCAONB</p> <p>NE states that the existing OWF installations have a compromising effect on the statutory purpose of the NCAONB [RR-063]. Respond, with reasoning.</p>	NNDC acknowledge that the existing OWF installations have impacted the long range sea views from within the AONB, both by day and by night, and that the baseline seascape has altered, but do not consider that this has had a significant impact on the statutory purpose of the AONB. The designated AONB landscape extends to mean low water and, while the links between land and sea are an essential part of its unique character and recognised within the Statement of Significance, it is the intertidal habitats, the variety and inter-relationship of the dynamic coastal features such as	The Applicant acknowledges NNDC's response and welcomes their commentary on this matter.

ID	Question	North Norfolk District Council Responses	Applicant's Comment
		<p>saltmarsh, soft cliff, dunes and shingle and the agricultural hinterland that make this landscape so rich. Human influence is also an integral part of the landscape through the archaeology, built heritage, agricultural practices, field patterns and coastal defence and the OWF installations can be viewed as a contemporary human intervention as a means to address climate change and geo-political forces.</p>	
Q1.18.3.2	<p>The Extent of Additional Harm to the NCAONB What is your assessment of the effects of the Proposed Development on the NCAONB in EIA terms?</p>	<p>NNDC consider that the proposed development will add similar elements to the existing baseline seascape, and due to the increased scale of the structures, the extended array will be more apparent in views from onshore.</p> <p>However, it is not considered that this will significantly alter the ability to experience the natural and scenic beauty of the designated AONB.</p>	<p>The Applicant acknowledges NNDC's response and welcomes their commentary on this matter.</p>
Q1.18.3.3	<p>Cumulative Impact Assessment Should a CIA be undertaken in order to inform the EIA to ensure that the impact of SEP and DEP on the statutory purpose of the NCAONB, in the context of the existing OWF, can be made?</p>	<p>NNDC consider that it is important to assess the cumulative effect on the seascape of the addition of the SEP and DEP to the existing OWF installation baseline</p>	<p>The Applicants notes NNDC commentary.</p> <p>In response, the Applicant refers to its responses for Q1.18.3.3 in the <a href="#">Applicant Responses to the Examining Authority's First Written Questions</a> [REP1-036].</p> <p>The purpose of a Cumulative Landscape or Seascape and Visual Impact Assessment ('CLVIA') is to describe; visually represent; and assess the ways in which a proposed wind farm would have additional impacts when considered with other consented or proposed wind farms.</p>

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			<p>This contrasts with an assessment of a windfarm on a baseline with existing operational wind farm present in the baseline as in the current case.</p> <p>In respect of SEP and DEP, scoping for the Cumulative Assessment identified that there were no other consented or proposed wind farms which were relevant to assess, thus no Cumulative assessment was necessary.</p>
Q1.18.3.5	<p><b>Tourism and Coastal Footpaths</b></p> <p>Is there any evidence to suggest that the construction of offshore wind turbines, and their cumulative seascape impact, has impaired, prejudiced or resulted in the loss of tourism activities/ enjoyment along the North Norfolk coast?</p>	<p>Given that significant construction activities for consented offshore wind NSIP schemes have yet to begin (including for Ørsted Hornsea Project Three or Vattenfall Vanguard or Boreas) there is no hard evidence available in relation to the construction impacts associated with bringing cables onshore and laying cables along a cable corridor.</p> <p>The original Sheringham Shoal and Dudgeon schemes were permitted under a different planning regime. There is no hard evidence available which states that existing windfarms visible from land have had a negative impact on tourism. Gathering such evidence is extremely challenging other than examining the number of repeat bookings. Clearly those looking for 'unspoilt' seascape views may be disappointed given the number of turbines visible along large stretches of coastline along the North Norfolk coast. Others may find the turbines of visual interest. It is very much dependent on the individual.</p>	<p>The Applicant acknowledges NNDC's response and welcomes their commentary on this matter.</p>
Q1.18.3.6	<p><b>North Norfolk Heritage Coast</b></p>	<p>This non-statutory designation and the defined purposes is encompassed within the remit of</p>	<p>The Applicant acknowledges NNDC's response and welcomes their commentary on this matter. Lighting</p>



ID	Question	North Norfolk District Council Responses	Applicant's Comment
	<p>Explain your respective positions on the qualities and significance of the Heritage Coast, particularly the stretch within which the Proposed Development would be theoretically and actually visible. Set out where you consider harms would occur and what, if anything, could be done to minimise the harm or improve the visitor experience.</p>	<p>the Norfolk Coast AONB and its strategic objectives. The type and extent of lighting should be limited to minimise nocturnal impact on the undeveloped coast.</p>	<p>will be restricted to that required for safety and navigation purposes.</p>
Q1.18.3.7	<p>Aviation Lighting Would you wish to see revisions to the quantum aviation lighting across both the Proposed Development together with the existing extent of the SOW and DOW, to minimise it where possible, so as to minimise night-time effects on the historic seascape?</p>	<p>NNDC recognise that aviation lighting is required to ensure turbine visibility at night for the benefit of aircraft safety. If opportunities exist to keep the number of lights to the minimum necessary to achieve safe then they should be explored. The Ministry of Defence may be best placed to guide such discussions.</p>	<p>The Applicant acknowledges NNDC's response and welcomes their commentary on this matter. Lighting will be restricted to that required for safety and navigation purposes.</p>
<b>Q1.18.4 Cumulative Effects</b>			
Q1.18.4.1	<p>Cumulative Effects Are you satisfied with the list of projects included in the assessment of potential cumulative landscape and visual effects? If not, identify those projects that you believe should be included and indicate why you believe that they should be included.</p>	<p>Yes, NNDC is satisfied with the list of projects included in the assessment of cumulative landscape and visual effects (as shown in Fig 5.1 Offshore Projects taken into account in the CIA, Chapter 5 of the EIA)</p>	<p>The Applicant acknowledges NNDC's response and satisfaction with the list of projects included within the assessment of cumulative landscape and visual effects.</p>
<b>Q1.20. Noise and Vibration</b>			
<b>Q1.20.1 Adequacy of the Assessments for Construction</b>			

ID	Question	North Norfolk District Council Responses	Applicant's Comment
Q1.20.1.1	<p>Methodology – Baseline Noise Survey</p> <p>The ES [APP-109, Paragraph 51] states that the baseline survey methodology was agreed with BDC. Large parts of the cable corridor, landfall and the substation are located in other local authority areas (NNDC and SNDC). Do NCC, NNDC and SNDC agree with the scope and extent of the baseline survey?</p>	<p>The applicant's acknowledgement that baseline data is unexpectedly high at LFR1 and LFR2 is noted/accepted. It is suggested that using the lowest threshold (for the BS 5228:2009+A1:2014 'ABC method') at identified NSRs for the assessment of construction noise' is an accepted noise target.</p>	<p>The Applicant acknowledges NNDC's response and welcomes their commentary on this matter.</p>
Q1.20.1.2	<p>Methodology - Baseline Noise Assumptions</p> <p>a) What is the justification for not undertaking baseline noise surveys at sensitive receptors along the onshore cable route and assuming a Category A threshold value [APP-109]?</p> <p>b) Further, explain why no surveys were undertaken in proximity to the main construction compound at Attlebridge.</p> <p>c) Is it possible that actual baseline levels at the sensitive receptors could be lower than assumed?</p> <p>d) If so, what impact would this have on the assessment?</p>	<p>a) Achieving the Category A target noise levels from BS5228 at receptors would achieve a standardised noise target residents for the duration of construction site noise.</p> <p>b) This site is outside NNDC area.</p> <p>c) Actual baseline noise levels may be low especially for rural areas.</p> <p>d) Receptors in areas of low background noise may experience a greater increase in noise levels in terms of decibel increase than sites with higher background noise, during construction. However, BS5228 suggests achieving a standardised target noise level at dwellings for each of the day, evening and night-time periods.</p>	<p>The Applicant acknowledges NNDC's response and welcomes their commentary on this matter.</p>

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Q1.20.1.4	<p>Methodologies – Noise and Vibration</p> <p>Do NCC, NNDC, SNDC and BDC agree with the Construction Phase Noise, Road Traffic Noise Assessment and Construction Phase Vibration Assessment Methodologies adopted in the ES [APP-109], including the predicted construction noise and vibration levels?</p>	<p>These are matters currently being resolved through the SoCG. Response to be provided by Deadline 2</p> <p>The following 3 documents have been reviewed:</p> <ul style="list-style-type: none"> <li>• Construction Phase Noise Assessment</li> <li>• Vibration Assessment</li> <li>• Road Traffic Noise Assessment</li> </ul> <p>General Methodology and suggested mitigation are acceptable and the impact of noise, road traffic noise and vibration have been assessed and receptors requiring further mitigation have been identified. Impacts during the construction phase are short term and potential suitable mitigation measures are highlighted.</p> <p>As in ID15 of the North Norfolk District Council Statement of Common Ground identifies the future mechanisms for discussion and agreement on mitigation measures.</p>	<p>The Applicant acknowledges NNDC's response and welcomes their commentary on this matter.</p>

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		<p>The CNMP, the OCoCP Revision B) and the Outline Construction Traffic Management Plan (document reference 9.16, APP) includes all relevant mitigation measures specified in ES Chapter 23 Noise and Vibration (document reference 6.1.23, APP-109) and is appropriate for managing construction and post construction impacts from the Project on Noise and Vibration receptors. The Code of Construction Practice is secured under Requirement 19 (within Schedule 2, Part 1) of the draft DCO.</p>	
<b>Q1.20.4 Adequacy and Design of Proposed Mitigation</b>			
Q1.20.4.3	<p>Potential Impacts – Monitoring Operational Noise</p> <p>To be effective should dDCO R21 be explicit about where monitoring should be done, such as the onshore substation? Provide revised wording if so.</p>	<p>NNDC have no comments to make here.</p>	<p>No comment.</p>
<b>Q1.22 Socio-economics effects</b>			
<b>Q1.22.1 Effects on recreation, tourism and business</b>			
	<p>Tourist Income</p> <p>In respect of the tourism assets on offer:</p> <p>a) Explain the main forms of tourism within Norfolk and, if possible, specifically in the areas where the Proposed Development would be located.</p>	<p>a) There are many forms of tourism in Norfolk. The ExA are advised to view the Visit North Norfolk website to see the full extent of tourism offer within North Norfolk. Welcome to North Norfolk - North Norfolk (visitnorthnorfolk.com) It would be near impossible to provide this as a static</p>	<p>a) The ES assessment, through the <b>Socio-Economics and Tourism Technical Baseline</b> [APP-277], provided an overview of tourism within Norfolk and within the area in which the proposed development would be located, including tourism assets within 500m of the onshore cable corridor. The source provided by NNDC provides useful</p>

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	<p>b) Explain the revenue that is derived from tourists visiting Weybourne Beach.</p> <p>c) Explain how construction works, particularly road closures and traffic management measures, deter or otherwise impinge on a tourist's desire to visit and explore Norfolk.</p>	<p>document. Many visitors are day visitors from across the region (and beyond including the midlands) drawn to the many coastal towns and beaches for the sea air, walks (including those with dogs) and food including popular fish and chips. Others are drawn to the area for its wildlife, landscapes, seascapes and generally unspoilt character and historic buildings and architecture. At Weybourne, the beach is a shingle beach but still proves very popular for walking (including those with dogs), sea fishing and other recreation. The Norfolk Coast path passes over the Proposed Development. Inland, the Proposed Development criss-crosses many rural roads popular with walkers and cyclists enjoying the landscape wildlife and historic buildings.</p> <p>b) NNDC operates a circa 300 space car park on Beach Road, Weybourne. The car park is situated adjacent to the beach and has a rough hard-standing finish. The car park is situated away from the village of Weybourne. The pattern of usage is in line with school holidays with peak usage in August with typically 1/5th of the peak number during the quieter (and colder) winter months. Car park income can vary from circa £11k to £17k per annum. Parking charges apply from 8am to</p>	<p>and new information available since the ES was prepared. The Applicant generally agrees with the NNDC observations about the nature and characteristics of tourism in North Norfolk and Weybourne. The information presented does not materially affect the assessment of the volume and value of tourism in Norfolk presented in the ES.</p> <p>b) It is noted that NNDC operates a circa 300 space car park on Beach Road. The car park is located adjacent to Norfolk Coast Path next to Weybourne beach. Weybourne car park is an important source of revenue for NNDC which is considered part of the value generated by tourism. It is assumed that the majority of the revenue is linked to tourists visiting Weybourne. It is noted that NNDC have indicated car park income can vary from circa £11k to £17k per annum. The HDD works at the beach should not require any prolonged periods of restrictions or closures to the beach for public access, although it is possible that some work activities will be required to be performed on the beach that may require short periods of restricted access. Given that any access restrictions at the beach will be temporary in nature, it is not anticipated that the development of SEP and DEP (and the cumulative effects of other projects) would have a significant impact on the car park revenue.</p>

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		<p>6pm and vary based on the type of tariff. Typical Coastal parking rate: 8am to 6pm - £1.80 per hour There are currently no electric vehicle charging points. Public toilets with disabled facilities are now available. Winter opening times: November to mid-March - open daily from 9am to 5pm. Summer opening times: mid-March to October - open daily from 9am to 8pm.</p> <p>c) See Local Impact Report submitted at Deadline 1. If construction activities block, impinge or otherwise detract from a positive visitor experience then affected visitors may decide not to return or re-visit which construction activities are taking place. NNDC accepts that it is challenging to present hard evidence of such impacts occurring. It is most likely that the extent of any such impacts will only be realised at the point that construction activities take place. This re-emphasises the importance of ensuring that construction activities are properly managed to reduce any adverse impacts as much as reasonably possible.</p>	<p>It is the Applicant's understanding that there are no local businesses with business premises directly on or next to Weybourne beach and therefore there is no revenue linked to businesses that are located on or directly next to the beach.</p> <p>In addition to NNDC's comment about the car park, there are other indirect revenue streams linked to Weybourne Beach. The beach brings in tourists who then spend money in Weybourne and the surrounding area as part of their trip. For example, a tourist may choose to visit the Muckleburgh Military Collection and have a meal in Weybourne as part of a day trip to Weybourne. Overnight visitors to Weybourne will also spend money on accommodation. The average spend per day visit in North Norfolk was £32.10 in 2020. Without full access to the beach overall numbers of trips to Weybourne may be lower and as such overall tourism based revenue to Weybourne would fall. It is however very difficult to quantify the scale of this indirect revenue robustly, particularly given that HDD works will be used at the beach and should not require any prolonged periods of restrictions or closures to the beach for public access. It is assumed that there will be no impact or a negligible impact on the number of visits to Weybourne beach and therefore no effect or a negligible impact on indirect tourism revenue linked to visits to the beach.</p>

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			<p>c) NNDC comment that "If construction activities block, impinge or otherwise detract from a positive visitor experience then affected visitors may decide not to return or re-visit which construction activities are taking place." As noted by NNDC there is no hard evidence to support this claim although this is acknowledged as a potential risk of negative localised impacts on tourism should no appropriate management measures be put in place. The Applicant is however confident that necessary measures have been identified in the ES to reduce any risk of negative impacts on the volume and value of tourism as are identified in <b>Socio-Economic Assessment</b> and the <b>Outline Construction Traffic Management Plan (Revision C)</b> [document reference 9.16], <b>Outline Code of Construction Practice (Revision C)</b> [document reference 9.17] and <b>Outline Landscape Management Plan (Revision C)</b> [document reference 9.18]. For example, it is noted in the <b>Outline Construction Traffic Management Plan (Revision C)</b> [document reference 9.16] that there will be works required that may necessitate the temporary closure of roads. The plan details appropriate measures that would reduce potential impacts, such as, staggering closures to ensure that nearby roads are not closed at the same time.</p>
Q1.22.2.8	Outline Skills and Employment Plan	The OSEP seems broadly acceptable as currently drafted. NNDC would assess the Local Skills and Employment Plan under	The <b>Outline Skills and Employment Plan (OSEP) (Revision B)</b> [document reference 9.23], submitted at Deadline 3, is an evolving document and the

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	<p>The OSEP [APP-310] sets out that the Applicant intends to work with the relevant sector and local authority bodies to help secure economic benefits of the OWF to the local area and identifies a number of general outline commitment examples. Is the OSEP currently sufficient to ensure local socio- economic benefits are secured and maximised, and are firmer commitments and targets for local employment and skills/training needed, particularly to realise the potential benefits set out in the ES [APP- 113]?</p>	<p>proposed draft DCO Requirement 26 for its area. The biggest beneficiaries are likely to be businesses and employers within LPAs not identified as the relevant planning authority within the NSIP. For example, the main port is expected to be within GYBC area and this is where the biggest economic benefits will be derived linked to port activities. There may be some benefit from amendment to Requirement 26 to involve Norfolk County Council, who have lead on the approval of similar Requirements for Vattenfall Vanguard and Boreas and for Ørsted Hornsea Project Three. Having the higher tier authority oversight of the OSEM may help bring together a consistency of approach across Norfolk and enable those authorities not likely to be discharging authorities under draft DCO Requirement 26 to have a voice in shaping the plan and delivering the maximum public benefits.</p>	<p>Applicant is actively collaborating with NCC, Norfolk Chambers and other stakeholders (including other developers) in order to gear up to the skills needs of a growing offshore wind industry in the East of England.</p> <p>New Government Statutory Guidance requires Local Skills Improvement Plans (2022) and the timing for these compliment the timely development (and improvement) of the Sheringham Shoal and Dudgeon Extension OSEP.</p> <p>Meanwhile the Final Skills and Employment Plan and resultant Key Performance Indicators (KPI)'s will feature in the Supply Chain Plan (SCP) for which the Applicant will need to achieve a certain standard (60% marks) before accessing CFD. The commitments made in the SCP will be officially monitored by the Department for Energy Security and Net Zero.</p> <p>Finally, the Applicant agrees with NNDC recommendation shared in <a href="#">The Applicant's Comments on Responses to the Examining Authorities first written questions</a> [REP1-036] (Q1.22.2.8 page 277) in their entirety and will deliver an updated OSEP for deadline 3 reflecting this.</p> <p>It is also worth noting that the comparatively generous existing Dudgeon Community Fund is entirely focused on Science, Technology, Engineering and Maths (STEM) opportunities and</p>



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			<p>outcomes and is being accessed actively by schools, educational organisations and charities in North Norfolk, Breckland and Great Yarmouth. The outcomes and impacts can be found on the Dudgeon OW website.</p> <p>Not only will the OSEP benefit from NCC's input during its preparation but NCC is the authority responsible for discharging Requirement 26 (Local skills and employment) of the <b>draft DCO (Revision F)</b> [document reference 3.1].</p>
<b>Q1.22.3 Effects on Individuals and Communities</b>			
Q1.22.3.2	<p>Development Consent Obligations</p> <p>NNDC [RR-069] reference potential community benefits being secured through an obligation. Describe to the Examination the nature and extent of any benefits you consider are necessary relative to the impacts of the Proposed Development, setting out how these comply with the CIL Regulations and the justification for them.</p>	<p>NNDC actually said within RR-069 that 'NNDC recognises that, once built, the scheme is likely to be relatively benign. However, the authority believes that it is important that the proposals sufficiently address any harmful impacts associated with construction including potential damage to coastal areas, loss of trees and hedgerows along and associated with the cable corridor, damage to roads and verges from traffic together with consideration of harm to the economic prosperity of businesses affected by any extended or multi-phased construction activities. The Council believes it will therefore be important for the examination panel to carefully consider and understand the package of CIL compliant benefits being put forward by Equinor New Energy Limited as part of the consent process and how those benefits would be secured. Outside of the DCO process, North Norfolk</p>	<p>This was discussed at Issue Specific Hearing 4 under agenda item 6.v. The Applicant has set out the following in its <b>Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 4</b> [Document ref: 16.9]:</p> <p>'A) The Applicant confirmed it has experience of a community benefit fund with the existing Dudgeon Offshore Wind Farm and is considering an equivalent for SEP and DEP. Meetings have taken place with Norfolk Community Foundations, NCC and other developers to look at opportunities for collaboration for community benefit funds and ensure there is support for strategic activities. This does not represent a change of position but the position is evolving.</p> <p>B) The Applicant confirmed this falls outside of the DCO process and the local authorities have acknowledged that.'</p>

ID	Question	North Norfolk District Council Responses	Applicant's Comment
		<p>District Council will seek to negotiate with Equinor New Energy Limited to secure a range of benefits for the wider community of North Norfolk'.</p> <p>NNDC is acutely aware from past NSIP examinations that, in the absence of available hard evidence quantifying potential harm to the economic prosperity of businesses affected by construction activities, it may be challenging to secure CIL compliant obligations to address the potential impacts. This does not mean that harm will not occur but that such harm is difficult to quantify in a way that enables provisions to be secured within a legal obligation that are CIL compliant.</p>	
<b>Q1.24. Water quality and resources</b>			
Q1.24.2.17	<p>Private Water Supplies</p> <p>Is it justified to address impacts on private water supplies post-consent? If so and further, how is this secured in the dDCO?</p>	No Comment	No comment.

## References

Local Skills Improvement Plans, 2022, Statutory Guidance for the Development of a Local Skills Improvement Plan, Department for Education, [Local skills improvement plans - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/local-skills-improvement-plans) Local skills improvement plans - GOV.UK (www.gov.uk) Accessed April 2023.