



Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects

The Applicant's comments on Norfolk Parishes
Movement for an Offshore Transmission Network
Deadline 2 Submission

Revision A

Deadline 3

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1 The Applicant's comments on Norfolk Parishes Movement's Deadline 2 Submissions

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 respond to the comments made by Norfolk Parishes Movement, detailed in **Table 1** and **Table 2** below.

Table 1 The Applicant's responses to Norfolk Parishes Movement comments on the Applicant's responses to the Examining Authority's First Written Questions: Offshore Transmission Network

ID	Norfolk Parishes Movement Comment	Applicant's Responses
1	<p>Madam Chair, on behalf of the Norfolk Parishes Movement for an Offshore Transmission Network (OTN) I would like to set out for the ExA our initial comments on the responses from the Applicant, National Grid Electricity Transmission Plc ("NGET") and National Grid Electricity Systems Operator Plc ("NGESO") to Written Questions 1.</p> <p>We would like to begin by raising our concern that Deadline 2 follows very quickly (just 11 days) after the publication of the responses on 24th February to Deadline 1. Bearing in mind the amount of information submitted and way that Parish Councils operate, it means that our organisation has not had the chance to fully develop the responses as we would wish. This disadvantage has been compounded by (a) the late submission from National Grid ESQ (NGESO) on key areas of concern for our group namely an alternative grid connection point and the use of an OTN and (b) the confusing lettering/numbering used by the applicant in their responses that does not clearly reflect that used by the ExA in WQ1.</p> <p>We ask therefore that we are permitted to make additional representations as necessary either as a late submission to this Deadline 2, or at the Issue Specific and Open Floor Hearings later this month.</p>	<p>The Applicant acknowledges the comment.</p>
Q1.2.2.1 - The Applicant Response		
2	<p>We note that the Applicant has failed to respond appropriately to the points (using the WQ1 lettering/numbering) addressed specifically to them, points c, d and e, and directs the ExA to National Grid to provide a response. The Applicant has chosen to completely ignore point f.</p>	<p>It is acknowledged that there is a missing reference to WQ1.2.2.1h) and g). This was a formatting error and including reference to these items does not alter the response provided.</p>
3	<p>We consider this is an unacceptable response. The Applicant was fully involved as part of the CION process in helping to select the Grid Connection Point (GCP). NGESO indicate the Applicant was responsible for providing information concerning "the environmental, disruption and consenting information" and "must be confident that environmental impacts wouldn't prohibit development". The Applicant must therefore know which options were considered and why the other alternatives were discarded.</p>	<p>The Applicant refers to its response to WQ2.2.2.1 which confirms that the Connection and Infrastructure Options Note (CION) process is led by National Grid.</p> <p>Given that no other connection point represents a 'reasonable alternative'... 'studied by the developer' (as required under Regulation 14 of the Infrastructure Planning (Environmental Impact Assessment) Regulations</p>

ID	Norfolk Parishes Movement Comment	Applicant's Responses
	<p>Most importantly they had several opportunities to influence and revise the decision made by National Grid ESO, both prior to and post the decision being made. If the CION process was carried out in an appropriate way, we cannot understand why the Applicant wishes to avoid the opportunity to present the clear rationale for Norwich Main. The Applicant's failure in this regard leaves us to draw our own conclusions and we trust that the ExA may be equally sceptical.</p>	<p>2017 (the EIA Regulations)), there is no requirement to consider an alternative grid connection point within the Environmental Statement.</p>
QI.2.2.1 - The National Grid Electricity Transmission Response		
4	<p>NGET has likewise declined to comment on any of the questions raised by the ExA and yet they too were fully involved as part of the CION process in helping to select the Grid Connection Point (GCP). As part of the Pre-Offer CION process, the NGET would be responsible for providing NGENSO with the details of the assessed onshore connection points which include:</p> <ul style="list-style-type: none"> • a list of the required transmission works, • the cost of the transmission works, • and a high level appraisal of technical, environmental, planning consent and deliverability issues related to each onshore connection point. <p>NGET must therefore know which GCPs were considered and why the other alternatives were discarded. We consider the response unacceptable.</p>	<p>The Applicant notes that this comment is directed towards NGET.</p> <p>For completeness, with reference to the response to WQ2.2.2.1 (c), the Applicant has provided a copy of the Connection and Infrastructure Options Note (CION) Process, Guidance Note v4.0 (NGESO, November 2018) (the CION guidance) at B.9 of Appendix B - Supporting documents to the Applicant's Responses to the Examining Authority's Second Written Questions [document reference 16.2.2] submitted by the Applicant at Deadline 3. The process for projects to secure a Grid Connection Agreement is an Ofgem regulated process which sits outside of the consenting process for a proposed development. NGENSO as System Operator coordinates inputs from Developers, Transmission Operators (TOs) and NGENSO.</p> <p>The Applicant does not consider the CION guidance to be a material consideration in the ExA's recommendation to the Secretary of State given that the process for NGENSO making a grid connection offer to a customer is regulated separately under a different relevant legislative framework to that under which consent is sought (i.e. the Planning Act 2008 and relevant secondary legislation). The CION guidance provides background to the NGENSO-led process followed which determined Norwich Main as the grid connection location offered to the Applicant.</p>
QI.2.2.1 - The National Grid Electricity Systems Operator Response		
5	<p>NGESO has also chosen to ignore the questions from the ExA, preferring instead to regurgitate generic information about the CION process. We</p>	<p>The Applicant acknowledges the comment.</p>

ID	Norfolk Parishes Movement Comment	Applicant's Responses
	<p>submit this is not only disrespectful to the ExA but is also not in compliance with the objectives of the CION process for transparency as set out by NGESO itself in "The Connection and Infrastructure Options Note (CION) Process", Guidance Note V4.0, 14 November 2018:</p> <p><i>The CION process is an optioneering process to identify the overall economic and efficient connection option. It provides a clear, transparent, repeatable and non-discriminatory process to ensure all relevant developers are treated in a consistent manner. This optioneering process involves Developers, TOs (i.e., NGET) and NGESO and takes place both pre-offer and post-signature".</i></p>	
6	<p>We are aware that other DCO applications comply with NPS EN-1 Section 4.4 and the EIA Regulations 2017 by discussing the alternative GCPs considered. We see no reason that an exception should be made to allow Equinor to disregard this requirement.</p>	<p>The Applicant refers to its response provided to WQ2.2.2.1(f) which states that compliance with paragraphs 4.4.1 and 4.4.2 of NPS EN-1 is not triggered by the location of the grid connection on the basis that:</p> <ul style="list-style-type: none"> • the process for NGESO making a grid connection offer to a customer is regulated separately under a different relevant legislative framework; • only one connection point, Norwich Main, was offered to the Applicant and therefore no other alternatives have been studied as part of the DCO application; and • the requirements of the EIA Regulations are not applicable to the grid connection location given that no other connection points represent a 'reasonable alternative'... 'studied by the developer'.
7	<p>In response to point (e), NGESO states:</p> <p><i>"...the route to the Norwich substation provided the shortest cable route and the best performance against the Cost Benefit Assessment and deliverability."</i></p> <p>We are unable to confirm this statement, but if the Cost Benefit Assessment favours the Norwich Main option by just £1, and deliverability of the options is equal, the above statement would hold true. Of course, the case may be more favourable but as none of the involved parties has chosen to enlighten</p>	<p>The Applicant acknowledges the comment.</p>

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	us, we have no information, so the £1 differential is a viable one and we must draw our own conclusion.	
8	NGESO has chosen not to present the CION document to the ExA claiming it is confidential. This is not acceptable. There should be nothing confidential about the alternatives considered by NGESO and the other participants concerning alternative GCPs.	Whilst this comment is directed to NGESO, the Applicant refers to B.9 of Appendix B - Supporting documents to the Applicant's Responses to the Examining Authority's Second Written Questions [document reference 16.2.2] submitted by the Applicant at Deadline 3, which includes details of the CION guidance.
9	The NSIP planning process is designed and conducted as a transparent process, open to public scrutiny, which is entirely appropriate given the extensive and extraordinary powers that are granted within a DCO, up to and including compulsory acquisition of privately owned land. It is completely inappropriate therefore for NGESO to hide behind a notion of 'confidentiality' which it chooses to apply- arbitrarily-to this crucial part of the process of deciding on the GCP. A detailed rationale for this refusal to share such an important element of the design of this proposal - which leads to such enormous and far-reaching impacts on the onshore environment and communities - should be insisted upon by the ExA.	
10	We believe that NGESO should be asked to submit the document with, if really necessary, genuinely confidential sections redacted. Redacted versions of the CION document have been made available in previous DCO application examinations.	
QI.2.2.3 - The Applicant Response		
11	We note that the Applicant has failed to respond appropriately to the point. We wonder whether they have properly consider Walpole as an alternative GCP. We consider this is an unacceptable response and refer the ExA to our arguments above and our Written Representation.	The Applicant refers to its response provided in ID6.
QI.2.2.3 - The National Grid Electricity Transmission Response		
12	We note NGET has declined to respond. We consider this is an unacceptable response and refer the ExA to our arguments above and our Written Representation.	The Applicant acknowledges the comment.

ID	Norfolk Parishes Movement Comment	Applicant's Responses
QI.2.2.3 - The National Grid Electricity Systems Operator Response		
13	<p>NGESO states:</p> <p><i>"Following input from various developers over the years, it is the NGESO and NGET's understanding that the seabed routes to Walpole through the Wash are at capacity with no further available space for more cables. Therefore, this option was discounted."</i></p> <p>We consider this response to be both unprofessional and wholly unsatisfactory. It is utterly disingenuous of them to imply that they have to operate only on an "understanding" of the situation, as if they only have partial information at their disposal. Nothing could be further from the truth.</p>	The Applicant acknowledges the comment.
14	National Grid Electricity System Operator and National Grid Electricity Transmission - as their names imply- are the spiders at the very centre of the web that delivers electricity to the UK consumer. They have in their possession full knowledge of all the information on every aspect of the system in their monopoly control. They could not operate without it.	The Applicant acknowledges the comment.
15	There is therefore no justifiable reason for their not performing properly their obligations under the CION process to look at alternatives GCPs. In fact, NGESO's own report, "East Coast Grid Spatial Study Summary Report", April 2021 makes clear that there is space available.	The Applicant acknowledges the comment.
16	<p>It is also worth pointing out that the Hornsea Three project was scheduled to connect into Walpole but was later switched to Norwich Main for connection. This decision was not due to seabed issues at Walpole. Furthermore, the Non-Technical Summaries from the two consented windfarms already connecting to Walpole state as follows:</p> <p>Lines:</p> <p><i>"The site is located within the Greater Wash SEA area, which is one of three areas that were designated by the UK Government in 2002 for further development of offshore wind farms. 11 "The proposed onshore cable route does not pass through any environmentally designated areas along the 11 km route. The land use along this route consists mainly of agricultural land."</i></p>	The Applicant acknowledges the comments with respect to another offshore wind farm DCO. It is not appropriate for the Applicant to comment on or speculate about another project and its history.

ID	Norfolk Parishes Movement Comment	Applicant's Responses
	<p><i>For major road crossings, cable installation would be achieved by horizontal directional drilling beneath the road."</i></p> <p>Race Bank:</p> <p><i>"Cables would be buried onshore for 11 kilometres from the landfall point to a new substation extension located directly adjacent to the existing substation at Walpole, Norfolk. Additional works at Walpole, required by National Grid in order to accommodate the connections for Race Bank, Lines and Docking Shoal Offshore Wind Farms, have been considered in the Onshore ES."</i></p> <p>Note that Docking Shoal was refused for 'ornithological reasons' and not the connection point proposal at Walpole. Therefore, the original spatial capacity for Docking Shoal or Hornsea Three could be taken up by DEP/SEP through The Wash.</p>	
Q1.2.3.1 - The Applicant Response		
17	<p>We consider the response from the applicant to be disingenuous and unacceptable. The Applicant states:</p> <p><i>Section 1.1 of the HND report (NG ESO, 2022} makes clear that "Offshore wind projects in scope for the Pathway to 2030 workstream are at a fairly early stage of development and primarily those that secured seabed leases through The Crown Estate's Offshore Wind Leasing Round 4 and Crown Estate Scotland's ScotWind Leasing Round. It also includes assumed projects in the Celtic Sea and a small number of additional projects due to connect at a similar time and/or location as others in scope".</i></p>	<p>The Applicant acknowledges the comment and does not have anything to add to the response provided to Q1.2.3.1 [REP1-036]. It reiterates that there continues to be significant Government and policy support for coordinating of transmission systems in offshore wind and notes that it has taken significant steps towards a coordinated approach between two separately owned offshore wind farms, as set out within the Scenarios Statement [APP-314].</p>
18	<p>It is clear therefore that although the Pathway to 2030 workstream concerns projects that are primarily those in Leasing Round 4, they are not necessarily exclusively from Leasing round 4. At the start of the OTNR process there was plenty of opportunity for Equinor to be involved in an integrated OTN. The co-development of SEP and DEP as radial connections to Norwich Main has been their objective since the outset and</p>	<p>With respect to the ability to negotiate an alternative Grid Connection Point, the Applicant refers to the response provided to WQ2.2.2.1 and summarised within ID6 above</p>

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	<p>the so-called "Pathfinder" status of the project is risible. With regard to the erroneous statement from the Energy Minister, Rt. Hon. Graham Stuart, this is of no relevance to the situation as the projects before the ExA have not been granted planning approval. It is, and always has been, an option for the Applicant to negotiate an alternative GCP. In addition, NGENSO are also at liberty to move agreed GCPs if considered necessary. It is thus entirely possible for SEP and DEP to connect to an OTN.</p>	
QI.2.2.4 - The National Grid Electricity Transmission Response		
19	<p>We note NGET has declined to respond. We consider this is an unacceptable response and refer the ExA to our Written Representation.</p>	<p>The Applicant acknowledges the comment.</p>
QI.2.2.4 - The National Grid Electricity Systems Operator Response		
20	<p>We note the similarities of the NGENSO response to that of the applicant. We also note that NGENSO admits the Applicant is solely responsible for deciding on whether or not to integrate. We consider this is an unacceptable response and refer the ExA to our Written Representation.</p>	<p>The Applicant acknowledges the comment and refers to the Scenarios Statement [APP-314] which explains the different scenarios included within the draft DCO (Revision F) [document reference 3.1].</p>
21	<p>We are dismayed that failures in regulation have led to yet another DCO application for radial connections through Norfolk.</p>	<p>The Applicant acknowledges the comment.</p>
22	<p>The NPM for an OTN has submitted a Written Representation which sets out our case for establishing a full integrated OTN down the East Coast of Britain and around East Anglia. We believe further that an opportunity for the government to reconsider its options in this regard has now arisen with the recent reports of Orsted (Hornsea Three) and Vattenfall (Norfolk Vanguard and Boreas) both considering pausing their construction programmes in order to secure government tax breaks. We believe this is the ideal moment to stop the nonsensical radial connections through Norfolk and to seriously consider a fully integrated OTN.</p>	<p>The Applicant acknowledges the comment and refers to the response provided in ID's 17 and 18.</p>
Other Point		
23	<p>In view of the similarity of their submissions on these key points, we ask the ExA to enquire whether the Applicant, NGET and NGENSO have collaborated on their response. In the case of NGET and NGENSO we would specifically</p>	<p>This comment has been directed to the ExA.</p>

ID	Norfolk Parishes Movement Comment	Applicant's Responses
	<p>request the ExA to ask whether they have collaborated by using the same solicitors to make their response and, if so, how this fits with their own distinct legal obligations to Ofgem for an arm's length arrangement between these companies. Are solicitors able to act for both companies in this matter? We believe it important to ensure there is no conflict of interest. As just one example, NGET is not allowed to participate in interconnection operations or any offshore tenders.</p>	
QI.2.4.1 - The Applicant Response		
24	<p>We consider that the Applicant response is misleading with regard to the weight which is attributed to considerations of need for this project which should be proportionate to the anticipated extent of a project's actual contribution to satisfying the need for a particular type of infrastructure, At Appendix B3, point 15 of their response the Applicant claims that SEP and DEP would deliver a "meaningful and significant contribution" of 4% to the capacity shortfall required to meet the above 40GW government target as set out in the Queen's speech in 2019. This target has of course been increased to 50 GW and clearly the Applicant has sought to present the most favourable figure.</p>	<p>The Applicant thanks the respondent for correcting the reference to 50GW. However, this does not materially change the substance of the response.</p> <p>Paragraph 129 of the Planning Statement (Revision B) [AS-031] quotes paragraphs 2.2.20 and 3.4.3 of EN-1, which respectively state: <i>'it is critical that the UK continues to have secure and reliable supplies of electricity'</i> and <i>'renewables have potential to improve security of supply by reducing reliance of the use of coal, oil and gas supplies to keep the lights on and power our businesses'</i>.</p>
25	<p>We submit it would be equally valid to take different targets. For example, as set out in the Overarching National Policy Statement for Energy (EN-1), paragraph 3.3.22, there is a minimum need for 59GW of new electricity generation capacity to be built by 2025. If we take that figure and, bearing in mind that under the dDCO there is a possibility that only the SEP project ever gets constructed, the contribution to the NPS target would be $0.338/59 \text{ GW} = 0.57\%$. This is based on the nominal output from the windfarm and using the derating factor of 0.43 as recommended by the Department for Business, Energy and Industrial Strategy, 2022, Digest of UK Energy Statistics 2021 the contribution would be 0.25%. Does this tiny contribution to the nation's future needs really justify the cumulative impacts and harm caused by this project to the environment and communities? We consider the Applicant has not demonstrated, on the planning balance, a clear benefit for the projects.</p>	<p>In addition, with reference to ID11-16 of the Applicants comments on Written Representations [REP2-017], as a result of technological advances, there may be an opportunity to realise up to 900MW from SEP and DEP within the existing Rochdale Envelope.</p> <p>The projects, individually or together, are therefore beneficial for the UK and would help contribute to meeting the need for secure and reliable supplies of renewable electricity.</p>

ID	Norfolk Parishes Movement Comment	Applicant's Responses
Q1.9.1.5 - The Applicant Response		
26	We consider the response from the applicant to be incorrect. In fact, according to the Electricity Ten Year Statement 2022 there is very little or no projected increase in demand from the transmission grid in Norfolk over the next 10 years. On the other hand, NGET makes clear in its Project Background Document that new generation capacity connecting into the grid in East Anglia, significantly from offshore windfarms, is the driver for the EA GREEN project.	The Applicant acknowledges the comment and does not have anything substantial to add to the response provided to Q1.9.1.5 [REP1-036] other than refer to ID6 above.
27	What the Applicant has conveniently overlooked is its obligation under the CION process and under NPS EN-1, 4.9.1: "it is for the applicant to ensure that there will be necessary...capacity...to accommodate the electricity generated"; namely, to ensure there is sufficient onward capacity within the onshore transmission grid. The ExA should enquire as to whether and, if so, precisely how the Applicant ensured this. It is unhelpful and irrelevant simply to state that the grid connection offer was not conditional on EA GREEN.	

Table 2 The Applicant's responses to Norfolk Parishes Movement comments on the Applicant's responses to the Examining Authority's First Written Questions: Tourism

ID	Norfolk Parishes Movement Comment	Applicant's Responses
1	<p>Madam Chair, on behalf of the Norfolk Parishes Movement for an Offshore Transmission Network (OTN) I would like to set out for the ExA our initial comments on the responses to Written Questions 1 from the Applicant with regard to Socio-Economic factors and in particular the potential impact on Tourism. We also provide as an Appendix a Methodological Critique of one of the papers cited by the Applicant.</p> <p>We recognise this is a late submission for the deadline but, in view of the deadline tightness and the way that the NPM operates, we would be very grateful if an exception could be made and that you consider these comments.</p>	Noted – no response required.
Document REP1-064, Point 8		
2	<p>The Applicant indicates that this question was raised by "One member of the public...". In fact the question was asked on behalf of the Norfolk Parishes Movement for an OTN which represents 96 parish councils in Norfolk. We have received concerns from a number of councils. We would not want the ExA, or anyone else, to think that the question is the issue of a single individual.</p>	The Applicant apologises for the misunderstanding.
3	<p>The Applicant claims that "the focus of the research was on UK based research and more weight is given to higher quality (i.e. academic peer reviewed research using robust methodologies) UK based research in the determination of impacts". It would be helpful if the Applicant could provide, not only a list of the papers which it considers have been peer reviewed, but also submit copies of the actual papers so that a proper interpretation of their content can be made by all parties.</p>	<p>The list of all studies included in the literature review of the tourism impacts of wind farms is included in the References section of Environmental Statement Appendix 27.2 – Socio-Economics and Tourism Technical Baseline [APP-278]. It is the Applicant's understanding that most of these studies are available online. However, copies can be provided if there are specific studies which are not available.</p>
4	<p>However, the point being made at the OFH was that none of the relevant research cited in their original submission referred to the North Norfolk coast and none of it examined the impacts on tourism during the construction phase. It is our view that the Applicant has not answered the question asked and it is not acceptable to rely on the currently available, often poor-quality</p>	<p>It is true that most of the studies included in the review focus mainly on tourism impacts during the operational phase of wind farms (for instance, due to visual effects and changes to the seascape and landscape). Very few of the studies assess impacts during the construction phase and this point has been acknowledged in previous responses. The few studies that have assessed impacts on tourism during the construction phase are those which</p>

ID	Norfolk Parishes Movement Comment	Applicant's Responses
	<p>studies which have limited relevance to the region impacted by SEP and DEP.</p>	<p>have analysed changes in tourism related sectors (e.g. hospitality) over the period when wind farms have been constructed which are referred to in the rest of Norfolk Parishes comments. These include the studies by Biggar Economics and analysis by Hatch as part of the Environmental Statement for the Awel-y-Mor offshore wind farm (Awel y Mor Offshore Wind Farm, Category 6: Environmental Statement; Volume 5, Annex 4.2: Seaside Tourism Economics Employment Evidence, Hatch, 2022).</p> <p>The Biggar Economics study includes analysis of North Norfolk as one of the case studies. The assessment of impacts in North Norfolk also considered changes in visitor volume and value over the period when Dudgeon offshore wind farm was constructed (2015-2017). This is based on data provided by North Norfolk council on visitor volumes. It shows that the number of day trips to North Norfolk increased by 815,000 between 2015 and 2017 (+11%) and the number of overnight trips increased by 62,000 (+10%). There is therefore no evidence that similar projects have had a negative effect on tourism in the district.</p>
Q1.22.1.4, Point c)		
5	<p>We do not accept the response provided by the Applicant because they have not presented convincing evidence. The traffic data referred to by the Applicant are forecasts but the real-life situation is clearly subject to continuous change. We know from experience that projects of this scope rarely go completely to plan and have serious impacts for local traffic. Has any attempt ever been made to determine the accuracy of the traffic forecasts for this type of complex series of overlapping projects or the success of the mitigation measures? Perhaps the ExA could seek this information from the Applicant, the Highways Agency or Norfolk County Council. If the plans and mitigation measures prove inadequate it will, of course, be the people and businesses of Norfolk that will be adversely affected. We consider the statement "the impact of onshore construction on the volume and value of tourism activity is anticipated to result in a minor adverse effect" is purely speculative and comes at little risk for the Applicant.</p>	<p>To understand the baseline traffic demand, the Transport Assessment [APP-268] outlines that baseline traffic flows have been captured for all 140 links forming the traffic and transport study area. With regard to the derivation of construction traffic demand, the Transport Assessment [APP-268] outlines that the forecasts have been derived with input from construction contractors J Murphy and Sons Ltd (JMS) and the Applicant's engineering team. Both JMS and the Applicant's engineering team have experience gained through the construction of previous projects of a similar scope and scale.</p> <p>Table 24-2 of the ES Traffic and Transport Chapter [APP-110] also outlines details of the worst case assumptions that have been applied to deriving the construction traffic forecast. This includes conservative assumptions and the application of contingencies which (together with early contractor input) ensure the worst case construction traffic forecasts are robust.</p>

ID	Norfolk Parishes Movement Comment	Applicant's Responses
		<p>The DCO application is also supported by an Outline Construction Traffic Management Plan (OCTMP) [REP1-021]. The objective of the OCTMP is to define a strategy to ensure that the worst case construction traffic forecasts (e.g. traffic numbers and routes) assessed within the ES are managed and not exceeded. The OCTMP also includes details of monitoring and enforcement measures to ensure compliance. The requirement to produce a final CTMP is secured by Requirement 15 of the draft DCO (Revision F) [document reference 3.1].</p> <p>The baseline traffic flows and forecast construction traffic demand has been agreed with Norfolk County Council as evidenced within the Statement of Common Ground [REP2-033].</p> <p>The Applicant disagrees that the conclusion about impacts on tourism is speculative. The conclusions are based on an extensive literature review, coupled with analysis of:</p> <ol style="list-style-type: none"> 1. change in tourism related employment in a number of areas affected by wind farms; and 2. the change in visitor volume and value in North Norfolk. <p>In both cases, the analyses have focused on change during the construction period of offshore wind farms when construction traffic is likely to have increased. There is no evidence to suggest that this has negatively affected tourism indicators.</p>
QI.22.1.5		
6	<p>The opening sentence of the Applicant's response states that: "It is not the case that there is a limited amount of research examining the relationship between wind farms and tourism activity." This contrasts with their statement in APP-277, page 51 which states: "Overall, there is a limited body of evidence relating to the extent to which offshore wind farms impact upon tourism." In fact, it is well-recognised that there is a limited body of research in this area and of course, we note the Applicant has done precisely nothing to add to it and nor does it propose to conduct any research.</p>	<p>The Applicant apologises for the error in the Environmental Statement referred to in the comment. It is the Applicant's position that there is a large amount of research examining the relationship between wind farms and tourism. However, most of these are ex-ante studies (undertaken before a wind farm has been built) rather than ex-post (undertaken after a wind farm has been built). They therefore rely heavily on how people say they would react to wind farms rather than actual changes in visitor behaviour. Ex-post studies are therefore considered to be more robust and less prone to bias. The Applicant has sought to address this gap by drawing upon the findings of the analyses by Biggar Economics and Hatch, which are both based on</p>

ID	Norfolk Parishes Movement Comment	Applicant's Responses
		<p>actual changes in employment in tourism related sectors (even if this only serves as a proxy for understanding change in tourism). This has been complemented with the data referred to above (see response to comment ID 4) which has estimated actual visitor numbers and visitor expenditure for North Norfolk over the period when wind farms have been constructed and visible on the horizon.</p>
7	<p>The Applicant refers to an ex post study from 2021 by BiGGAR Economics. BiGGAR Economics is a commercial consultancy company that counts a number of windfarm developers among its clients. It can therefore hardly be considered independent. This study is an update of an earlier study reported in 2017 and which itself was an update of previous studies. We would draw the attention of the ExA to a paper by Douglas Wynn BSc (Soc) MSc (Econ) for the John Muir Trust entitled "Methodological Critique of the Report 'Wind Farms and Tourism Trends in Scotland' Revised Version by Biggar Economics Ltd, October 2017". A copy is provided as an Appendix to this series of comments. As you will see, the BIGGAR paper methodology relies on ONS data and remains heavily criticised for the way it draws conclusions from these. The paper concludes "We would also very much welcome a direct reference of the Biggar Report to ONS by any Reporter at a PLI who wishes a definitive judgement on the appropriateness or otherwise of Biggar's uses of ONS's BRES base data. For our part we do not believe that ONS's professional specialists on tourism statistics would be much impressed - but that would, of course, be for them to judge."</p>	<p>The Biggar Economics report is based on objective analysis of employment trends using data published by ONS. It is not clear why Biggar Economics' status as a commercial consultancy should undermine the credibility of the report when it is based on analysis of secondary data from an independent source.</p> <p>The main criticisms of the approach in the paper by Douglas Wynn centre on the fact that the analysis focuses on change in employment in tourism related sectors (mainly hospitality but also including a number of other sectors such as recreational activities). It observes that the client markets for these sectors include local residents as well as tourists, and therefore this should not be used as a measure of tourism activity or value. Biggar Economics acknowledge this as a limitation of the analysis, and while it is agreed that employment in these sectors is not a perfect outcome indicator, it is a good proxy indicator for measuring the health of the tourism economy. The approach used by Biggar Economics to define the tourism sector using a 'best fit' of Standard Industrial Classification (SIC) codes is one that is widely used in sector analyses, evidence bases and strategies and one that the ONS is very familiar with.</p> <p>The reasons why employment data is used is because it is the only tourism related dataset available on a consistent basis below regional level. The main datasets on visitor volumes and value are only available at regional level, which is too large to assess change in tourism in the areas affected by wind farms. Some areas have access to more local data, but this is usually based on modelled estimates derived from regional data.</p> <p>In the case of North Norfolk, data is available on the number of day visits and overnight visits to North Norfolk. This is a direct outcome indicator which does not have any of the limitations of employment data identified by</p>

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		<p>Mr Wynn. As described above in the response to comment ID4, this shows that the number of visits to North Norfolk grew at a very strong rate over the period when a new offshore wind farm was constructed in North Norfolk.</p>
8	<p>The Applicant similarly refers to a second study, also conducted by BIGGAR Research in 2020. This report suffers from the same methodological deficiencies as the above-mentioned report. The 2020 report covers a number of locations and includes a section looking at tourism in North Norfolk AONB using a single parameter – the number of people employed in the accommodation and food services sector. This parameter is examined during periods when construction both is, and is not, taking place. The nature of the construction is not specified in the paper but it is doubtful whether it covers the likely scenario for SEP and DEP with the cumulative impact of construction of: overlapping cable paths; onshore infrastructure arising from offshore wind projects; and all the other infrastructure projects planned for Norfolk.</p>	<p>As described above in response to ID4, the analysis of change in tourism related sectors in North Norfolk over the period when Dudgeon offshore wind farm was constructed is also consistent with data on the number of visits to the area over the same period.</p> <p>The Applicant acknowledges that there are a number of other wind farms with onshore infrastructure in North Norfolk, and there may be some overlap with that of SEP and DEP. Nevertheless, there is no evidence to suggest that will result in a significant impact on tourism. The landfall for Norfolk Vanguard and Norfolk Boreas would be in a different part of the district, with the cable corridor only crossing with that of SEP and DEP in a location which is outside the main tourism areas. There is potential for cumulative impacts on tourism from Hornsea Project Three which has a similar landfall location near Weybourne Beach. However, the risk of this is low given that:</p> <ol style="list-style-type: none"> 1. Any disruption would be temporary and limited to a small area, meaning it is likely to have a limited impact on the visitor experience. 2. The main activities at Weybourne Beach, which include fishing and walking, would not be restricted. 3. A range of embedded mitigation measures will be applied- by both projects to minimise any disruption to visitors. This includes using trenchless crossing and HDD drilling at Weybourne Beach and the coastal path. 4. The assessments for other chapters find the significance of cumulative effects will be no greater than that for SEP and DEP alone.
9	<p>The Applicant bases its conclusions on snippets of flawed data, coupled with research conducted in situations that are not reflective of that facing Norfolk. We submit that this is a poor basis for supporting sweeping justification statements. Nevertheless, the Applicant feels able to reach its</p>	<p>The Applicant disagrees with this characterisation. The conclusions are based on an extensive literature review, including a range of academic studies and authoritative reports on behalf of Government. This has been coupled with analysis of change in tourism related employment in a large</p>

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	conclusion that it "does not believe there are any grounds to take a precautionary approach and believe the negligible effect is justified."	number of areas affected by wind farms, and analysis of the change in visitor volume and value in North Norfolk itself over the period when a new wind farm was constructed. In contrast, no evidence has been provided by any party to support the claim that tourism will be negatively affected by the development.
10	We would also suggest that the number of visitors recorded at visitor centres for Sheringham Shoal and Rampion probably has more to do with how tourists choose to spend their time on a rainy day rather than them actually seeking the 'attraction' of offshore windfarms as put forward by the Applicant.	The Applicant notes that a number of studies have found a minority of people say they are more likely to visit an area after construction of an offshore wind farm. This is particularly true for young people and those that are passionate about preventing climate change.
11	We consider that the Applicant has not presented sufficient data to justify its conclusion.	The Applicant disagrees with this point. The evidence supporting the conclusions are set out above (see response to comment ID4).
QI.22.1.6		
12	The Applicant puts forward its interpretation of how tourists would respond to the negative impacts created by the projects. Its assessment of the information concerning the magnitude of the impacts is by definition subjective.	The Applicant disagrees with this point. The conclusions are based on an extensive literature review, including a range of academic studies and authoritative reports on behalf of government. This has been coupled with analysis of change in tourism related employment in a large number of areas affected by wind farms, and analysis of the change in visitor volume and value in North Norfolk itself over the period when a new offshore wind farm was constructed. There is nothing to suggest from this research that the development of offshore wind farms adversely affects tourism. Therefore, the conclusion that the magnitude of impact is negligible is based on an objective assessment of the evidence.
QI.22.1.7		
13	We are concerned that in this response the Applicant has restricted its consideration of tourism assets to those within 1km of the onshore cable corridor. What is the justification for this? The traffic disruption caused by the project is likely to spread much further from the cable corridor and would thus incorporate a far greater number of tourism assets and smaller businesses reliant on tourism. It also needs to be considered on a	The analysis has focused on the visitor assets within 1km of the cable corridor because these are likely to be the most affected by onshore construction. It is acknowledged that increased traffic could mean there are impacts over a wider area. Nevertheless, the findings of Chapter 24 – Traffic and Transport [APP-110] suggest there will be no significant effects after mitigation measures have been taken into account. Therefore, the

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	cumulative basis with all the other offshore wind infrastructure projects planned for Norfolk.	conclusions are likely to be the same if the assessment considered a wider study area.
QI.22.1.8		
14	We would observe that according to a report in the Times (The Times, 3rd March 2023) both Orsted and Vattenfall are considering delaying their Final Investment Decision and pausing their projects because of concerns over rising costs. This may affect the overlapping timescales of the projects with SEP and DEP. In any event, the cumulative effects assessment by the Applicant that the effects would overall be minor seems to be speculative.	The Applicant is aware of the article referred to but is unable to comment on the construction programme for the other projects mentioned.