



# Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects

Written Summary of the Applicant's Oral Submissions  
at Issue Specific Hearing 4

**Revision A**

Deadline 3

May 2023

Document Reference: 16.9

Title:	
<b>Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects Examination submission Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 4</b>	
PINS document no.: 16.9	
Document no.: C282-BS-Z-GA-00017	
Date:	Classification
<b>May 2023</b>	<b>Final</b>
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Approved by:	Date:
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## 1 Introduction

1. This document presents a written summary of Equinor New Energy Limited's (the Applicant) oral case at Issue Specific Hearing 4 (ISH 4) (**Table 1**). ISH 4 on the Sheringham Shoal Offshore Wind Farm Extension Project (SEP) and Dudgeon Offshore Wind Farm Extension Project (DEP) Development Consent Order (DCO) application took place on 23 March 2023 at 10:00am at Main Auditorium, The Kings Centre, 63-75 King Street, Norwich, NR1 1PH.

**Table 1** Written summary of the Applicant's oral submission at ISH 4

I.D.	Agenda item	Applicant Response
<b>Development Scenarios and Alternatives</b>		
3.i	<p>The need for the flexibility afforded to the Applicant in the selecting Development Scenario and communicating with parties about it; the possibility, implications, benefits and risks of introducing and securing a cut-off point of selecting a development Scenario as a point of no return.</p>	<ul style="list-style-type: none"> <li>A. The Applicant confirmed it is continuing dialogue with Office of Gas and Electricity Markets (Ofgem) and the Department for Business Energy and Industrial Strategy (BEIS) (now the Department for Energy Security and Net Zero (DESNZ)) regarding the Contract for Difference (CfD) process and the amendments to that regime which would enable the Applicant to submit linked or dependent bids from projects with different ownerships.</li> <li>B. The Applicant confirmed the process for amending the regime is entirely out of the Applicant's control so there is no certainty over the timescale as to if and when those changes may be brought in.</li> <li>C. The Applicant confirmed that until there is clarity on those amendments to the CfD regime from Ofgem and BEIS all scenarios need to stay available to the Applicant.</li> <li>D. The Applicant confirmed having a development consent order (DCO) is a pre-qualification requirement for submitting a CfD bid. Until consent is granted, it will not be possible to bid into an allocation round. Clearly a commercial decision will need to be made at the appropriate time as to whether changes the Applicant would chose to await the necessary regulatory changes to be in place and satisfactory, or whether separate bids for SEP and DEP are to be made at risk.</li> <li>E. The Applicant confirmed there is a chance that where there are separate bids, one project could be unsuccessful or both projects could be unsuccessful. Further, even if joint bids are allowed it may be the case that SEP and DEP would not be able to bid jointly as that will depend on the specific requirements of the (amended) regime.</li> <li>F. The Applicant confirmed that the decision making process as to which scenario will be selected is set out in detail in the <b>Scenarios Statement</b> [APP-287]. The Applicant has carefully considered whether this could be put into a flow chart format but this would be a challenging exercise given the number of variables. For example,</li> </ul>

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		<p>in the event only one project is successful in the CfD process, there is a range of outcomes for the other project like selling it on, not constructing at all or finding alternative routes to market. These would all have different associated timescales and it is therefore difficult to set out in any great detail in that format.</p> <p>G. The Applicant confirmed the process would consist of a balance of considerations. The structure of the application and the Environmental Statement (ES) had to account for any one of the scenarios being required. There will not be absolute certainty on which will be progressed until Final Investment Decision (FID) is reached both each project. At that point there will be further clarity on which scenario will proceed and in what timescales. This is the normal process which offshore wind farms (and many other major infrastructure projects), which are funded in this way, go through. The Applicant therefore reiterated that it does not consider that a requirement for a 'cut off' on a development scenario decision is necessary.</p> <p>H. The Applicant confirmed it does not anticipate that works will be started and later abandoned. Once FID has been achieved, there will be significant commercial pressure on the projects (and obligations towards their investors) to proceed to execution and completion. At this stage the relevant authorities would be notified as to the chosen scenario. If the projects reach FID at different times and the first project chooses to proceed, it will not necessarily be possible at that stage to confirm what would happen with regards to the second project. Please see response to Q1.2.3.2 (<a href="#">The Applicant's Responses to the Examining Authority's First Written Questions</a> [REP1-036]).</p> <p>I. The Applicant confirmed that whilst works must commence within the time limits secured in Schedule 2, part 1, Requirement 1 of the <a href="#">draft DCO (Revision F)</a> [document reference 3.1], the development is not required to complete within a certain time. It is a general principle of the planning regime that once a development is commenced, it is for the developer to determine the timelines for construction and completion. Whilst it is possible for completion</p>

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		<p>notices (in the Town and Country Planning Act 1990 regime) to be served by a local authority requiring a development to be completed, these are very rarely used in practice. [Post-hearing note: The Applicant also refers to its responses to Q2.6.2.2 and Q2.11.1.2 of <b>The Applicant's Responses to the Examining Authority's Second Written Questions</b> [document reference 16.2].]</p> <p>J. The Applicant confirmed that generally once FID has been achieved, the final placement of contracts will be made. This is the culmination of a long period of procurement work which will feed into the placement of contracts. The undertaker would then proceed to start discharging requirements (including the requirement to notify the local planning authorities and the Marine Management Organisation (MMO) of the development scenarios).</p> <p>K. The Applicant reiterated the point that if there were two separate DCO applications then these questions would not be raised. It is not necessary or appropriate for this development to be subject to additional controls around commencement or completion by reason of the fact there are two projects under one application. The Applicant will therefore not be incorporating any completion mechanism within the <b>draft DCO (Revision F)</b> [document reference 3.1]. [Post-hearing note: The Applicant also refers to its response to Q2.6.2.2 of <b>The Applicant's Responses to the Examining Authority's Second Written Questions</b> [document reference 16.2].]</p>
3.ii	Comparing the absolute worse case scenario in the current application, to the two proposals (SEP and DEP) coming forward separately for Examination, which would be worsen.	<p>A. The Applicant confirmed the only disadvantage it sees from a joint application is that typically projects want to be in control of the direction of an application (without programme and risks being contingent on another). In this case a decision was made for the Applicant to take both projects forward, on behalf of its partners, into a joint development process and subsequent DCO application for reasons explained in the <b>Scenarios Statement</b> [APP-134].</p> <p>B. The Applicant confirmed that in its view, making two separate applications would have more significant environmental effects. For</p>

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		<p>example, if two separate applications were made it is highly unlikely that the projects would have the same cable corridor or even that they would have cable corridors located next to each other. This means a single haul road approach would also be highly unlikely. For two separate applications, there would also be the need to run separate processes so there would be two separate negotiations with landowners, separate stakeholder engagement and two separate DCO applications for example.</p>
3.iii	<p>Further explanation of all the possible delivery timescales that could be, under all scenarios and as firmly secured through the dDCO.</p>	<p>A. The Applicant confirmed that the ES considers the worst case scenario (WCS) for construction. This was considered both in terms of a concurrent construction scenario (which is the WCS for peak construction) and the sequential construction scenario (which is the WCS for duration of construction impacts).</p> <p>B. The Applicant confirmed that in the sequential scenario the maximum construction time is 24 months for the onshore period of construction for works associated with the cable ducting and installation of each project (<b>Environmental Statement Chapter 4 Project Description (Revision B)</b> [document reference 6.1.4]). There is also a maximum gap of four years from the commencement of the first project to the commencement of the second project. That will result in 6 years construction for the works associated with the cable ducting and installation and 8 years construction for total works (onshore and offshore). Plate 4-25 within <b>Environmental Statement Chapter 4 – Project Description (Revision B)</b> [document reference 6.1.4] Project Description comprises an Indicative Construction Programme which shows SEP and DEP built sequentially with up to a 4 year gap between construction start dates. It shows that onshore cable ducting and installation are anticipated to take 6 years (from towards the end of Year 1 to towards the end of Year 7). All works (including other onshore works i.e. at the onshore substation, and offshore) are anticipated to take 8 years to complete.</p> <p>C. The Applicant confirmed it believes this to be a reasonable assumption of the construction programme based on the</p>



I.D.	Agenda item	Applicant Response
		<p>information available to the Applicant at this stage. Whilst the timelines in plate 4-25 [APP-090] are only indicative and the ES has sufficiently assessed the reasonable WCS of construction impacts and is compliant with regulation 14(3)(b) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and the requirement to assess likely significant effects.</p> <p>D. The Applicant also confirmed that the construction period for the onshore cable ducting and installation for both projects in the concurrent scenario is 26 months.</p> <p>L. The Applicant confirmed it would consider these points further and provide additional clarity in writing at Deadline 3. [Post-hearing note: see response to Q2.6.2.1 of <a href="#">The Applicant's Responses to the Examining Authority's Second Written Questions</a> [document reference 16.2]]</p>
3.iv	Whether the Environmental Statement suitably assesses the potential for the Proposed Developments to be constructed at the same time but by separate construction crews.	<p>A. The Applicant confirmed the transport assessment assumes the onshore cable installation is completed in sections. This informs the transport assessment (<a href="#">Environmental Statement Chapter 24 Traffic and Transport</a> [APP-110]).</p> <p>B. The Applicant confirmed that in practice, all land that is affected will not be subject to the impacts of construction at the same time or for the whole period. Once works are complete on one section of the cable route, as much of the area is reinstated as quickly as possible, mitigating the length of time that construction occurs at that location. As a linear scheme the project will be split into sections with multiple construction teams working on different sections of the project( <a href="#">Environmental Statement Chapter 4 Project Description (Revision B)</a>, Section 4.6.1.3 [document reference 6.1.4] ). The ES considers that up to a maximum number of 10 work fronts could be worked on at any one time (one per 1km section) (Table 4.32, <a href="#">Environmental Statement Chapter 4 Project Description (Revision B)</a> [document reference 6.1.4]). The Applicant confirmed that work will be distributed along the corridor with work fronts coordinated.</p>

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		<p>C. The Applicant confirmed that paragraph 89 of the <b>Scenarios Statement</b> [APP-314] acknowledges that there will need to be a level of coordination between the projects irrespective of what scenario comes forward. The need for the projects to coordinate and collaborate will be controlled by necessary commercial agreements.</p> <p>D. The Applicant confirmed that the <b>draft DCO (Revision F)</b> [document reference 3.1] does not allow for entirely separate construction in the concurrent scenario. The scenarios definitions are linked to and must be read alongside the works descriptions and works plans. These in effect, set out restrictions on the works which can actually take place in a scenario where two projects can come forward separately. For example, the works descriptions and works plans show only a single haul road can be constructed which would require coordination. Further, the corridors are not separate. By the nature of what is included within the works descriptions there has to be a level of coordination to implement those projects in the scenarios as drafted.</p> <p>E. The Applicant confirmed it would respond to a query raised by Derek Aldous as to whether the CfD process imposes a completion date [[Post-hearing note: see response to Q2.11.1.2 of <b>The Applicant's Responses to the Examining Authority's Second Written Questions</b> [document reference 16.2]].</p> <p>F. The Applicant confirmed it would look to provide further information regarding the scenarios and the supplementary figures provided at Procedural Deadline A to address the points discussed further. [Post-hearing note: see response to Q2.6.2.1 of <b>The Applicant's Responses to the Examining Authority's Second Written Questions</b> [document reference 16.2]].</p>
<b>Assessment of Alternatives</b>		
4.i	Alternatives to grid connection at Norwich Main substation offered by National Grid; process of assessing the alternatives.	A. The Applicant confirmed that the outcome of the Connection and Infrastructure Options Note (CION) process was a single grid connection offer at Norwich Main.

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		<p>B. The Applicant confirmed that, as set out in the NGESO “Connection and Infrastructure Options Note (CION) Process Guidance Note” (V4.0, November 2018) (the CION guidance), the process is led by National Grid Electricity System Operator (NGESO) with National Grid Electricity Transmission (NGET) and the Applicant providing input.</p> <p>C. The Applicant confirmed that NGESO consider the CION decision making process to be a confidential one so the Applicant did not provide details of that. In general the CION process is an Ofgem regulated process that is focused on questions of cost to the consumer and efficiency, but it also takes into account questions of environmental impact, deliverability and consentability. That is all explained in the guidance. The Applicant has no objection to further information regarding the CION process being shared with the Examination.</p> <p>D. The Applicant confirmed that in the general requirement for consideration of alternatives in National Policy Statement (NPS) EN1 (paragraph 4.4.1), there is no obligation on the applicant to identify the best or optimum option.</p> <p>E. The Applicant confirmed the CION process is not controlled by the Applicant and it is for NGESO to make the final decision.</p> <p>F. The Applicant confirmed the site selection process took place in the usual way from when the CION process reached its conclusion and the decision on the grid connection point was known. This approach is in compliance with the requirements of the EIA process.</p> <p>G. The Applicant confirmed it would explain the extent to which the Applicant was able to contribute to consideration of alternatives in CION process, including by reference to the provisions in NPS EN-1. [Post-hearing note: see response to Q2.2.2.1(f) of <b>The Applicant's Responses to the Examining Authority's Second Written Questions</b> [document reference 16.2]].</p> <p>H. The Applicant noted that it is clear from the guidance that the CION process does take into account environmental considerations as</p>

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		<p>well as commercial elements. One of the core drivers is the commercial element of cost to the consumer.</p> <p>I. The Applicant confirmed it would submit the CION guidance and the statement provided by the Minister of State for Energy and Climate to the East Anglian communities on this topic into the Examination. [Post-hearing note: see response to Q2.2.2.1(c) of <b>The Applicant's Responses to the Examining Authority's Second Written Questions</b> [document reference 16.2]].</p>
<b>Land Use</b>		
5.i	The impact on Agri-environment Schemes [APP-105] and whether provision is needed in the dDCO to secure compensation, given other mechanisms in place [REP1-036, Q1.16.1.3 and Q1.16.1.4].	This item was directed to and addressed by the National Farmers Union.
5.ii	Assessment of the cumulative impacts on temporary loss of agricultural land and justification for taking into account that land will be reinstated post construction [APP-105] [PD-010, Q1.16.1.5].	<p>A. The Applicant confirmed that having reviewed the cumulative impact assessment again for [this chapter (<b>Environmental Statement Chapter 19 - Land Use, Agriculture and Recreation (Revision B)</b>) [document reference 6.1.19]], it is acknowledged that the effects of cumulative impacts could not be lower than impacts arising from SEP and/or DEP alone. This should have been considered to be moderate and significant in EIA terms, albeit only for a temporary period during construction.</p> <p>B. The Applicant confirmed this therefore requires mitigation but there would still be a residual significant effect. The mitigation measures are outlined in paragraph 19.7.1.2.5 [APP-105], for example an agricultural liaison officer will be appointed to minimise disruption.</p>
5.iii	Is there evidence of soil heating associated with the existing Dudgeon development and whether any mitigation (such as cement based sand) was used for that scheme.	<p>A. The Applicant confirmed that cement based sand was only used at the joint bays in the Dudgeon Offshore Wind Farm. The Applicant confirmed that it is not in a position to confirm whether cement based sand will be used for SEP and DEP because an assessment needs to be undertaken post-consent which will determine whether it is needed.</p> <p>B. The Applicant confirmed that the integrity of the system is affected if cables overheat and it is therefore in the Applicant's interest to</p>

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		<p>ensure this does not happen. The relevant levels are set within the technical specifications for the cables.</p> <p>C. The Applicant confirmed that it would consider whether this needed to be secured in the <b>Outline Code of Construction Practice (Revision C) (OCoCP)</b> [document reference 9.17] .[Post-hearing note: see response to Q2.16.2.1 of <b>The Applicant's Responses to the Examining Authority's Second Written Questions</b> [document reference 16.2]].</p>
<b>Socio-Economic</b>		
6.i	<p>The robustness of the Environmental Statement [APP-113] in terms of its consideration of impacts on tourism in North Norfolk, including whether there is any evidence to suggest potential impacts have been understated [REP1-082].</p>	<p>A. The Applicant confirmed that there is no evidence that offshore wind farms have a negative impact on tourism, although evidence on impacts during the construction period is more limited than evidence for impacts during the operational phase.</p> <p>B. The Applicant confirmed there is data on trips made to Norfolk during the period when the Dudgeon Offshore Wind Farm was built. This was included in the response to <b>North Norfolk District Council's Local Impact Report</b> [REP2-039]. The number of day trips to North Norfolk increased by 815,000 between 2015 to 2017 (+11%) and overnight trips increased by 62,000 (10%). Total visitor spend increased by 5%. These growth rates are higher than national and regional comparators. If the period is extended to 2019 the total number of visits increases to 1.9 million. Two studies were done by BiGGAR Economics which looked at the change in employment in the hospitality industry (as a proxy for tourism value) in areas where new offshore or onshore wind farms have been constructed. These show the growth rate in the local hospitality sector either exceeded the long term average or national comparators which suggests there were no negative effects on tourism. The study has been criticised on the basis that the performance of this sector is also influenced by local people spending money in hospitality businesses. However, areas with a strong tourism sector have a high share of employment in the hospitality industry, meaning it is a good proxy indicator for</p>

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		<p>measuring the performance of the tourism sector. In North Norfolk itself, employment in hospitality increased by 25% between 2015 and 2021. A number of other studies which have explored the relationship between offshore wind farms and tourism are based on visitor surveys which are not very robust. Nevertheless, these studies find that most visitors say their behaviour would be unaffected by the development of a new wind farm. A small proportion say they are more or less likely to visit, and this is often linked to their personal views on offshore wind generally.</p> <p>C. The Applicant noted that paragraph 5.12.7 of NPS EN1 suggests limited weight should be given to assertions of tourism impacts without evidence. There is some evidence that there will be no impacts and no evidence that there will be negative impacts.</p> <p>D. The Applicant has presented a lot of data in the context of North Norfolk which was provided by North Norfolk District Council. This showed numbers of visits increased by 25% between 2015 and 2019 (before the start of the Covid pandemic) which includes a period when a wind farm has been constructed and become operational.</p> <p>E. The Applicant confirmed embedded mitigation has been included, for example trenchless crossing for coastal path at Weybourne, with only a temporary diversion for up to a week. Whilst that impinges on some people's visitor experience it would be temporary and confined to a small area. This is unlikely to outweigh the positive benefits of visiting north Norfolk.</p>
6.ii	Whether there is a need for a tourism and associated business impact mitigation strategy [REP1-082].	<p>A. The Applicant clarified that mitigation is not required as significant adverse effects have not been identified.</p> <p>B. The Applicant confirmed it would further consider the suggestion that it could contribute to further research assessing the relationship between offshore wind farms and tourism. [Post-hearing note: see response to Q2.22.1.1 of <a href="#">The Applicant's Responses to the Examining Authority's Second Written Questions</a> [document reference 16.2]].</p>

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6.iii	<p>The cumulative effect of the proposed development and others in East Anglia on available bedspaces for construction workers, including whether any mitigation is required in this regard.</p>	<p>A. The Applicant confirmed it has done further work on the demand and supply of bed spaces in visitor accommodation which will be submitted at Deadline 3 [Post-hearing note: see response to Q2.22.3.1 of <a href="#">The Applicant's Responses to the Examining Authority's Second Written Questions</a> [document reference 16.2]]. This has included information about the potential level of demand from other developments in East Anglia. Outside peak months there would be adequate capacity to meet demand. In a hypothetical WCS, peak demand for accommodation would be 2,500 bed spaces. This would increase occupancy in visitor accommodation in East Anglia in July (the peak month) from 85% to 94% and would mean there are 1,600 rooms unoccupied. As such, there would be sufficient capacity overall, although this would mean there is increased competition for rooms and a risk of price increases. However, it is highly unlikely that the peak periods of demand for all projects would overlap given some have already started construction and others are unlikely to reach their peak workforce requirement for several years. For example, one project included is Sizewell C which is forecast to reach peak demand in year seven of the construction period (2031 at the earliest). The peak demand for all the offshore wind developments are expected to occur before that. Removing those projects which are unlikely to overlap with the peak for SEP and DEP (i.e. East Anglia THREE and Sizewell C) reduces the occupancy rate to 90.4% in peak months. This is high, but not unheard of in popular visitor locations.</p> <p>B. The Applicant confirmed the assessment has not made an allowance for future growth in the supply of rooms and bedspaces. Given this is a market-based product the market can respond to evidence of increased demand and the Applicant would expect that to be the case.</p> <p>C. The Applicant confirmed that mitigation measures such as room sharing or co-ordination with other developers could be an option which could potentially be considered further.</p>

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		<p>D. The Applicant confirmed that mitigation of these impacts is an unusual point to be exploring as it will be the first time this has come up outside of a major nuclear new build, which have a much larger workforce requirement.</p> <p>E. The Applicant confirmed it would look at impacts on accommodation types and prices further. The Applicant confirmed it would include the highway improvement schemes in its assessment of impacts on visitor accommodation. [Post-hearing note: see response to Q2.22.3.1 of <a href="#">The Applicant's Responses to the Examining Authority's Second Written Questions</a> [document reference 16.2]].</p>
6.iv	Whether the Outline Skills and Employment Plan is adequate, having regard to the Applicant's planned amendments [REP1-036, Q1.22.1.8].	<p>A. The Applicant confirmed it is undertaking the actions listed in response to first written question 1.22.2.8 (<a href="#">The Applicant's Responses to the Examining Authority's First Written Questions</a> [REP-036]). The <a href="#">Outline Skills and Employment Plan (Revision B)</a> [document reference 9.17] is evolving and part of a wider conversation about skills and employment. The Applicant notes that Norfolk County Council (NCC) was content with the approach.</p>
6.v	The case for a Community Fund to be set up by the Proposed Development.	<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>
<b>Landscape</b>		
7.i	Whether the evidence provided to date by the Applicant is sufficient to demonstrate that effects on landscape character assessed within the	<p>A. The Applicant confirmed that the parameters of the photomontages are based on an indicative layout, which is not fixed. The Applicant</p>



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	<p>Landscape Visual Impact Assessment are not related to any specific substation layout(s) or the siting of integral elements required for operation.</p>	<p>confirmed that the final built form could result in different components being located in different positions.</p> <p>B. The Applicant confirmed the visual assessment (see <b>Environmental Statement Chapter 26 - Landscape and Visual Impact Assessment</b> [APP-112]) is holistic, and in the round for a particular receptor, given the substation site will be experienced from a number of different viewpoints. If different components were in different positions, the overall effect would be unchanged.</p> <p>C. The Applicant confirmed that the overall composition of the site would read as a substation but the Applicant would work to ensure the substation would be the best fit for the landscape by reference to the design guidance and principles contained within the <b>Design and Access Statement (Revision B)</b> [document reference 9.3]. The arrangement and how the components are designed together is for the detailed design stage. The Applicant will engage with a contractor to carry out that process of detailed design.</p> <p>D. The Applicant confirmed that there have not yet been detailed discussions around the design of the substation site and there is no specific layout for the substation site yet.</p> <p>E. The Applicant confirmed the substation site is 'dished'. There will be a cut and fill process which creates the platform and involves moving material from one half of the platform area to the other half. That will involve stripping topsoil and moving that with excavators to create the formation level. 400mm of stone on top will form the foundation for the substation building, as described in <b>Environmental Statement Chapter 4 Project Description (Revision B)</b> [document reference 6.1.4].</p> <p>F. The Applicant confirmed the material will be entirely from within the site.</p> <p>G. The Applicant confirmed it would confirm how much the platform would be raised above the lowest point of the site. [Post-hearing note: see response to Q2.10.1.1 of <b>The Applicant's Responses to the Examining Authority's Second Written Questions</b> [document reference 16.2]</p>

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		<p>H. The Applicant confirmed that the photomontages for viewpoints 1 to 3 (see <b>Supporting Figures to Chapter 26 Land and Visual Impact Figures</b> [EV-045]) shows the WCS.</p>
7.ii	<p>The measures proposed by the Applicant to assess the effects of the substation buildings and structures on the surrounding landscape at detailed design stage.</p>	<p>A. The Applicant confirmed that it will not be undertaking any further formal assessment of effects and South Norfolk District Council are content with the information provided to date. Should the Applicant's application be consented, the detailed design will be discharged by the Local Authority, mindful of requirements, including the design intent and approach set out in the <b>Design and Access Statement (Revision B)</b> [document reference 9.3] (now secured within the <b>draft DCO (Revision F)</b> [document reference 3.1] at Requirement 10 (5)) (Schedule 2, part 1) and the consented parameters. The supplier/contractor of the substation(s), once appointed post consent, will come forward with design options, which the local authority will test against the design aspirations set out in the <b>Design and Access Statement (Revision B)</b> [document reference 9.3]. Whilst the LA may undertake a 'sense test' of potential effects of the detailed design, the post consent role is one of approving detailed designs, not assessing impacts which takes place at the application stage.</p>
7.iii	<p>The effectiveness of requirements proposed by the Applicant relating to detailed design of form, massing, building envelope, fencing and screening intended to minimise adverse effects on the surrounding landscape. Discussion to focus on how these requirements should be considered, how they might be secured in the absence of initial design proposals for substation layout(s) and whether the Applicant's approach satisfies the requirements of NPS EN-1 (Part 5.9).</p>	<p>A. The Applicant confirmed there were a number of factors which fed into the site selection process for the onshore substation site. This included landscape features, for example the fact it is enclosed by vegetation, is within a dip in the landscape and is lower still within the site itself. The Applicant confirmed the process of creating a flat platform using cut and fill at the proposed height avoids potential negative drainage implications and the need to export material offsite with associated waste and transport implications. The approach taken is considered to have found the right balance with all of the relevant factors.</p> <p>B. The Applicant confirmed its approach to design of the onshore substation has been appropriate in the context of a development of this type and has followed an iterative process. The final design</p>

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		<p>details will be settled through the approval process with the local planning authority as required by Requirement 10 of the <b>draft DCO (Revision F)</b> [document reference 3.1]. The Applicant confirmed it was normal for indicative designs not to be created until post-consent and this is the case here as no design contractors have yet been appointed. The <b>Design and Access Statement (Revision B)</b> [document reference 9.3] does, however, set out the guiding principles for design and ensures the design attributes comply with NPS EN1 paragraph 5.9.22.</p> <p>C. The Applicant confirmed it would consider further whether indicative conceptual designs should be developed and submitted (including colours, materials, fencing and screening). [Post-hearing note: see response to Q2.10.1.3 of <b>The Applicant's Responses to the Examining Authority's Second Written Questions</b> [document reference 16.2]]</p> <p>D. The Applicant confirmed that mitigation of landscape impacts is embedded into the substation site selection and elements like the planting strategy and design principles are set out in the <b>Outline Landscape Management Plan (Revision C)</b> [document reference 9.18] and the <b>Design and Access Statement (Revision B)</b> [document reference 9.3]. There is also additional mitigation, the details of which will be determined at a later date.</p>
7.iv	The requirement, or otherwise, for dedicated mitigation of visual effects at Attlebridge Main Compound	<p>A. The Applicant confirmed that the longest period for which the temporary construction compound at Attlebridge will be in place for is 26 months in a concurrent scenario and 24 months if only one project comes forward in isolation. In a sequential scenario the compound land could be reinstated once the first project has completed.</p> <p>B. The Applicant confirmed it does not consider there is a need to mitigate landscape impacts at the Attlebridge compound given it will be temporary. This is the case in all scenarios.</p> <p>C. The Applicant confirmed that in line with best practice the topsoil at the Attlebridge compound will be stripped from the entire compound and stored in temporary bunds (to heights agreed with</p>

I.D.	Agenda item	Applicant Response
		<p>the local planning authority through the CoCP approval) to preserve soil condition for reuse when the site is restored. These bunds are most likely to be around the edges to maximise the operational area and will provide a degree of visual (and noise) screening.</p>
7.v	<p>Description of the change proposed for the removal of an additional area of hedgerow close to the main construction compound; and feedback from Local Planning Authority and Local Highway Authority.</p>	<p>A. Hedgerow H0103 is south west of ACC33 at the main temporary construction compound at Attlebridge. During discussions with the highways team at NCC, officers expressed concern regarding highway visibility at the junction. The concern is addressed through coppicing or removing hedgerow H0103. The Applicant has put forward the non-material change and the necessary documentary changes as a result (see the <b>Cover Letter - Non-Material Change</b> [REP2-001a]). The Applicant hopes any impacts can be limited to coppicing.</p> <p>B. The Applicant confirmed that following consideration of the impacts, the non-material change will not result in any new or materially different effects.</p> <p>C. The Applicant confirmed that Requirement 11(2)(e) of the <b>draft DCO (Revisions F)</b> [document reference 3.1] (Schedule 2, part 1) requires a landscape scheme to be submitted to the local planning authority prior to commencement including details of existing trees and hedges to be removed and Requirement 11(2)(f) covers landscape work and restoration of impacted trees and hedgerows.</p>
<b>Seascape</b>		
8.i	<p>Further consideration and explanation of the case for a cumulative impact assessment which examines the existing baseline and its effect on the statutory purpose of the Norfolk Coast Area of Outstanding Natural Beauty.</p>	<p>This agenda item will be carried forward to written questions.</p>
8.ii	<p>The extent of additional harm to the Norfolk Coast Area of Outstanding Natural Beauty which would result from the Proposed Development.</p>	<p>This agenda item will be carried forward to written questions.</p>
<b>Design</b>		

I.D.	Agenda item	Applicant Response
9.i	The adequacy and suitability of the Applicant's design response to its Landscape Visual Impact Assessment findings of adverse visual effects arising at the proposed onshore substation site.	See agenda items 7.i to 7.iii.
9.ii	The extent to which the Applicant has demonstrated that it has applied the principles of good design set out in NPS EN-1 in the design proposals submitted for the onshore substation.	See agenda items 7.i to 7.iii.
9.iii	The design information directly related to the proposed onshore substation buildings and structures which would be secured within the dDCO.	See agenda items 7.i to 7.iii.
9.iv	The benefits, or otherwise, to both the Applicant and Local Authorities of an independent design review process to inform the design development of the onshore substation buildings and structures with reference to NPS-EN1, Paragraph 4.5.5.	<p>A. The Applicant confirmed it has not ruled out an independent design review and would support this process if it was deemed to be required post-consent. Given the predicted level of effects, however, the scope of design is limited. The functional nature of the onshore substation building(s) and extent of design thinking to date means the justification for a design review remains in question. The local planning authority's view is the most important as they will be the arbiters of the design. If they will be assisted by design review then the Applicant would be open to partaking in a design review process. The local planning authority would need to be involved in any such process and they may feel their officer time is best spent elsewhere.</p> <p>B. The Applicant confirmed it is aware that a design review process is secured in Norfolk Vanguard and Norfolk Boreas DCOs and would consider this requirement wording. [Post-hearing note: please see changes to the <b>draft DCO (Revision F)</b> [document 3.1]].</p>
<b>Procedural decisions, review of actions and next steps</b>		
10	The ExA requested that the Applicant provide an additional track changed DCO at each deadline to show the totality of the changes made with colour coding to show which changes were made at each deadline. The ExA suggested that the Applicant look at what was provided for the A428 Black Cat to Caxton Gibbet Road Improvement scheme and Norfolk Boreas Offshore Wind Farm DCOs during Examination.	<p>A. The Applicant explained that the provision of such a document would require manual manipulation and would be an extremely laborious and difficult task. However, the Applicant agreed to consider the Black Cat and Norfolk Boreas examples to confirm what it can provide.</p>