



Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects

The Applicant's Response to Issues raised at the Open Floor Hearing 2

Revision A

Deadline 3

May 2023

Document Reference: 16.13

Title:	
Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects Examination submission	
The Applicant's Response to Issues raised at the Open Floor Hearing 2	
PINS document no.: 16.13	
Document no.: C282-RH-Z-GA-00259	
Date:	Classification
May 2023	Final
Prepared by:	
Equinor	
Approved by:	Date:
Sarah Chandler, Equinor	May 2023

Table of Contents

1	Introduction	4
	References	20

Table of Tables

	Table 1 The Applicant's Response to Issues Raised at the Open Floor Hearing 2	5
--	---	---

1 Introduction

1. This document provides the Applicant's summary response on key topics raised at Open Floor Hearing (OFH) 2 which took place at 7:00pm, 29th March 2023 at Fishmongers Recital Hall, Gresham School, Cromer Road, Holt NR25 6EA.
2. The topics and responses can be found in **Table 1** below.

Table 1 The Applicant's Response to Issues Raised at the Open Floor Hearing 2

I.D.	Stakeholder Comment	Applicant Response
Corpusty & Saxthorpe (Tony Barnett, lecturer)		
1	<p>In The Applicant's Comments on Post-Hearing Submissions the response to Mr Barnett's critique of the methodology was to repeat the methodology used. Mr Barnett critiqued this response, specifically ID9 and ID10 of the response table in The Applicant's Comments on Post-Hearing Submissions [document reference REP2-043], arguing that it was not adequate.</p>	<p>A detailed response to REP01-073 is provided in Appendix B.3 of Appendix B – Supporting Documents to the Applicant's Responses to the Examining Authority's Second Written Questions [document reference 16.2.2] (see especially row B).</p> <p>In summary, the Applicant notes the difference between the approach suggested in REP1-073 and that taken in APP-114 is of academic interest. The Applicant is confident in the analysis that has been conducted and the conclusions that have been reached.</p>
2	<p>Mr Barnett requested the Examining Authority pay close attention to the Applicant's omission of the word "wellbeing".</p>	<p>The Applicant acknowledges that this is a comment for the ExA.</p>
3	<p>Regarding the response to ID 12 in The Applicant's Comments on Post-Hearing Submissions [document reference REP2-043]:</p> <ul style="list-style-type: none"> Norfolk County Council acknowledges their engagement and accepts that methodology is appropriate and is best practice. Mr Barnett requested that Councillor Stephan Aquerone provide the minutes of this meeting, in order to ascertain what presentation was provided to Norfolk County Council. 	<p>The minutes of a meeting held between the Applicant and NCC, which confirm that "the methods proposed for the ES health chapter were agreed with NCC public health team" and that those methods "align with international and national good practice", are available in Appendix B3 of Appendix B – Supporting Documents to the Applicant's Responses to the Examining Authority's Second Written Questions [document reference 16.2.2].</p>
4	<p>Regarding the response to ID 33-50 in The Applicant's Comments on Post-Hearing Submissions [document reference REP2-043]:</p> <ul style="list-style-type: none"> Mr Barnett critiqued the response that was provided – "The Applicant notes that these comments are directed to the Examining Authority for consideration" Mr Barnett stated that the detailed list of questions submitted in Corpusty and Saxthorpe Parish Council Deadline 1 Submission [REP1-073] have been evaded and requested that they be answered. 	<p>The Applicant had understood that the questions posed by Mr Barnett [ID 33-50 in REP2-043] were directed to the Examining Authority.</p> <p>The ExA has asked the Applicant to respond to the questions raised by Mr Barnett in REP2-043 (see WQ2.4.5 [PD-012]) and the Applicant has provided a response at Deadline 3.</p> <p>A detailed response to REP01-073 is provided in Appendix B.3 of Appendix B – Supporting Documents to the Applicant's Responses to the Examining Authority's Second Written Questions [document reference 16.2.2].</p>

I.D.	Stakeholder Comment	Applicant Response
Chris Monk (Cawston PC)		
5	Mr Monk voiced concerns of previous experience with other developers, including poor communications, broken promises, box-ticking exercises, no information and residents being ignored.	The Applicant acknowledges the comments and responds to further statements in the following rows:
6	<p>Traffic impacts:</p> <ul style="list-style-type: none"> The Applicant's position that not routing traffic through the village will result in little impact ignores commuters, businesses and school pupils. Noted that locals have been getting parking tickets. Mr Monk commented that other developers have amended their working hours to recognise this but Equinor has refused to do so. Impact on the village will be the same regardless of which direction traffic is being routed (East as per the application). Mr Monk stated that the B1145 is inadequate for construction traffic and the use of other roads provides a safety issue. 	<ul style="list-style-type: none"> With regards to the comments on routing traffic through the village, the Applicant refers to its previous response contained within Table 3.4.1 (ID.3) of The Applicants Comments to Relevant Representations [REP1-033]. With regards to comments related to locals being issued parking tickets, the Applicant is aware that Hornsea Project Three and Norfolk Vanguard have introduced a scheme to provide new traffic restrictions to assist the movement of heavy goods vehicle (HGV) traffic movements through the centre of Cawston. The Applicant does not propose to implement any parking restrictions in Cawston and refers to its previous answer (above) in relation to the commitments made to not route SEP and DEP heavy goods vehicle (HGV) traffic through Cawston. With regards to other developers amending their working hours, the Applicant refers to its previous response contained within Table 1 of The Applicant's Response to Issues Raised at the Open Floor Hearing [REP1-064]. With regards to the adequacy of the B1145 to accommodate construction traffic, the Applicant refers to Table 3 of The Applicant's Comments on Responses to the Examining Authority's First Written Questions [REP2-040].
7	Mr Monk critiqued the temporal cumulative impact of multiple wind farms.	The Applicant notes this comment.
8	Requests that the Examining Authority should take a wide view on issues including the National Grid, methods of delivery, and health and well-being.	Whilst the query has been directed to the Examining Authority, with respect to health and well-being, the Applicant notes that in the assessment of human health the Applicant has taken a wide view of health and wellbeing in accordance with national and international guidance for Health in Environmental Impact Assessment (including Cave et al. (2017), International Association for Impact Assessment and European Public

I.D.	Stakeholder Comment	Applicant Response
		<p>Health Association (2020), Public Health England (2020) and Institute of Public Health in Ireland (2021) [APP-114, paragraph 58]. Human health spans across environmental, social, behavioural, economic and institutional components (paragraph 61).</p> <p>With respect to National Grid and the location of the grid connection point, the Applicant refers to its response to Q1.2.2.1 within The Applicant's Responses to the Examining Authority's First Written Questions [REP1-036] submitted at Deadline 1, which describes the Connection and Infrastructure Options Note (CION) process that culminates in a grid connection offer. Further information is provided in response to Q2.2.2.1 within The Applicant's Responses to the Examining Authority's Second Written Questions [document reference 16.2] submitted at Deadline 3.</p> <p>With respect to methods of delivery, the Applicant assumes that the query relates to delivery of the Projects and the construction phase. The Applicant refers to the Scenarios Statement [APP-314] which sets out an explanation of the project development scenarios within the Development Consent Order, and ES Chapter 4 Project Description (Revision B) [document reference 6.1.4] which describes the construction methodology.</p>
Norfolk Parishes Movement for an Offshore Transmission Network (Mr Betts)		
9	<p>Critique of project necessity:</p> <ul style="list-style-type: none"> Equinor has presented itself as doing good work for creating clean energy and meeting Gov targets. Mr Betts stated that if both SEP and DEP were constructed then 719 MW would be generated, but the worst case would be 338 MW. The 719 MW would provide 1/3 of 1% of energy demand in the UK. 338 MW would provide 1/8 of 1%. Mr Betts argued that these wind farms are not beneficial for the UK and that any benefits are outweighed by the negative impact on Norfolk Mr Betts stated that the Applicant has failed to bring both consortiums together for construction. 	<p>The need for, and benefits of, SEP and DEP are described within Section 4 of the Planning Statement (Revision B) [AS-031]. Of note, paragraph 101 quotes paragraph 3.1.4 of the Overarching NPS for Energy (EN-1), which states that <i>'the UK needs all the types of energy infrastructure covered by this NPS in order to achieve energy security at the same time as dramatically reducing greenhouse gas emissions'</i>. Paragraph 129 of the Planning Statement (Revision B) [AS-031] quotes paragraph 2.2.20 of EN-1, which states <i>'it is critical that the UK continues to have secure and reliable supplies of electricity'</i> and (paragraph 3.4.2) that: <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> <p>As noted in Supplementary Information to the Scenarios Statement [document reference 9.28.2] submitted at Deadline 3, the need for each</p>

I.D.	Stakeholder Comment	Applicant Response
		<p>project is supported and reinforced by the new consultation draft national policy published in March 2023, which places offshore wind generation projects in a new and additional category of “Critical National Policy”. Further, the March 2023 consultation draft national policy makes clear that “<i>The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS</i>” (paragraph 3.2.7 of draft EN-1).</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> <p>With respect to the final bullet point, the Applicant refers to paragraph 35 of the Scenarios Statement [APP-314], which confirms that a Cooperation Agreement is in place between SEL (Scira Extension Limited) and DEL (Dudgeon Extension Limited) which are the named undertakers that have the benefit of the DCO. The Cooperation Agreement governs the cooperation and sharing of costs between the two entities.</p>
10	<p>Regulatory matters:</p> <p>Both projects brought forward without Ofgem committing to delivering them with one CfD. This is not allowed under the current regime.</p>	<p>As explained in section 5.2 of the Scenarios Statement [APP-314], under the current CfD regime two projects with separate ownerships are not permitted to submit shared or dependent bids.</p> <p>As stated during ISH4 and noted at ID 3i of Written Summary of the Applicant’s Oral Submissions at Issue Specific Hearing 4 [document reference 16.9], the Applicant continues to engage with key stakeholders including BEIS (now the Department for Energy Security and Net Zero (DESNZ)), Office of Gas and Electricity Markets (Ofgem), National Grid ESO and the Offshore Wind Industry Council (OWIC) Offshore Transmission Group workstream to advocate for the necessary changes to the CfD regime that would enable shared, or dependent, bids from projects with separate ownerships.</p>
11	<p>Construction scenarios:</p> <ul style="list-style-type: none"> Mr Betts stated that it is necessary to gain 7 different permissions for the flexibility required. 	<p>As stated in Supplementary Information to the Scenarios Statement [document reference 9.28.2] submitted at Deadline 3, the Applicant recognises that there is a preference from the local community and other statutory and non-statutory stakeholders for the two projects to be</p>

I.D.	Stakeholder Comment	Applicant Response
	<ul style="list-style-type: none"> Mr Betts stated that the concurrent construction of Scenario 2 should be approved only. 	<p>delivered concurrently. The Applicant's preference and ambition are entirely aligned with this view; however, as explained in the Scenarios Statement [APP-314], without changes to the current CfD regulations, there is no mechanism to guarantee that both SEP and DEP can secure CfDs at the same time, with the same milestone delivery dates, and for delivery within the same commissioning window. It is therefore necessary to retain flexibility to develop the projects in isolation, i.e., only one project is progressed, or sequentially (where one project is constructed ahead of the other).</p>
12	<p>Grid connection:</p> <ul style="list-style-type: none"> The Applicant states that the grid connection point is out of their hand; in fact, Equinor puts forward a preferred option and provided surveys to National Grid. CION offer is not fixed and can be changed by signatories. A change in grid connection is possible up until construction. Norfolk Parishes Movement for an Offshore Transmission Network continues to propose a Walpole grid connection point, arguing that this removes most cumulative impacts. Mr Betts requested that the Examining Authority ask the Applicant and each CION party to share relevant information regarding the decision of the grid connection site. 	<p>The Applicant notes the comments and refers to its response to Q1.2.2.1 within The Applicant's Responses to the Examining Authority's First Written Questions [REP1-036] submitted at Deadline 1.</p> <p>The process for projects to secure a Grid Connection Agreement is Ofgem regulated and sits outside of the consenting process for a proposed development. NGESO as System Operator coordinates inputs from Developers, Transmission Operators (TOs) and NGESO. The Applicant can confirm that, while the CION process considered a range of potential options, only Norwich Main was offered to the Applicant. Furthermore, as stated during ISH4 and noted at ID 4i of Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 4 [document reference 16.9], the CION process is not controlled by the Applicant, and it is for NGESO to make the final decision regarding a connection offer.</p> <p>Further detail regarding the CION process and the resulting grid connection offer is provided in response to Q2.2.2.1 within The Applicant's Responses to the Examining Authority's Second Written Questions [document reference 16.2] submitted at Deadline 3.</p>
Norfolk Parishes Movement for an Offshore Transmission Network (Mrs Betts)		
13	<p>Impact of the main compound:</p> <ul style="list-style-type: none"> SEP and DEP have put forward proposals that may leave a large period of time between projects if sequential. There could be several years between the first and second build periods. The compound will have a great temporal cumulative effect. 	<p>The Applicant refers the Norfolk Parishes Movement for an Offshore Transmission Network to the Environmental Statement (ES); where each topic's assessment has considered the main compound within its own Realistic Worst-Case Scenario (RWCS) and a Cumulative Impact Assessment as appropriate (see ES Chapter 5: EIA Methodology [APP-090]). The degree to which the landscape and other environmental</p>

I.D.	Stakeholder Comment	Applicant Response
	<ul style="list-style-type: none"> The compound will be left as a blot on the landscape for a long time. If SEP and DEP are developed using a sequential scenario, the compound should be landscaped following the construction of the first project. Mrs Betts noted that the Applicant should be required to reinstate the TCC immediately after the first project is completed. 	<p>considerations would be affected would vary and should be considered on that basis.</p> <p>It is the Applicant's position that measures will be taken at the appropriate point in the post-consent design process to mitigate potential and relevant effects. Details of landscape impacts and mitigation will be considered further within the Outline Landscape Management Plan which is secured under Requirement 11 of the draft DCO (Revision F) [document reference 3.1].</p> <p>The Applicant notes that, as stated in its response to Q1.17.3.3 in The Applicant's Responses to the Examining Authority's First Written Questions [REP1-036] [inter alia]:</p> <p>"...the design process has considered siting through options studies, and the site selected is considered to be optimum across environmental consideration, all which of constitute embedded mitigation written in and further to the consent of the scheme, measures. The approach to design has also considered the size of the compound, informed by operational requirements.</p> <p>The approach to design allows further details of the construction compound design and operation to be determined and agreed post consent, with contractor input, in line with the final Code of Construction Practice, based upon the Outline Code of Construction Practice (Revision B) [document reference 9.17] secured by Requirement 19 within the draft DCO (Revision C) [document reference 3.1], to include the design of noise mitigation requirements. This is all as normal for projects of this nature.</p> <p>The precise detail would be determined at the post construction stage."</p> <p>The Applicant notes Mrs Betts' request and refers Mrs Betts to the proposed post-consent design process outlined above.</p>
14	<p>Compensation fund:</p> <ul style="list-style-type: none"> Mrs Betts stated that the Applicant has yet to commit to a compensation fund and those affected directly by SEP and DEP should receive compensation. 	<p>The Applicant refers to its response to Q1.22.4.1 in The Applicant's Responses to the Examining Authority's First Written Questions [REP1-036] which details the benefits which will be delivered as part of the project and how the Applicant will work with the local community to ensure that these are delivered.</p>

I.D.	Stakeholder Comment	Applicant Response
	<ul style="list-style-type: none"> The community fund supported by Norfolk County Council is inadequate and the Norfolk Parishes Movement for an Offshore Transmission Network would not support it. Mrs Betts noted that this could be the 6th/7th time that communities will face a cable route being constructed, and the energy generated will not have anywhere to go in Norfolk. 	<p>In the Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 4 [document reference 16.9], under ID 6.v, the Applicant notes the experience it has managing a community benefit fund and states that it is considering an equivalent for SEP and DEP. The establishment of a community fund sits outside of the DCO process.</p>
15	<p>Grid connection, cumulative impacts and Offshore Transmission Network:</p> <ul style="list-style-type: none"> Mrs Betts referred to the National Policy Statement and stated it is the Applicant's responsibility to ensure there is sufficient capacity for the energy. Noted that the Applicant has failed to meet obligations under NPS 4.8.1. to ensure there is necessary capacity to accept the generated capacity. Mrs Betts referenced the East Anglia Green project being a direct consequence of the radial connection of wind farms. An Offshore Transmission Network would deal with the cumulative impacts related to this. 	<p>"It is understood that Mrs Betts' representation was here referring to paragraph 4.9.1 of the designated Overarching Energy National Policy Statement EN-1, which states:</p> <p><i>"4.9.1 The connection of a proposed electricity generation plant to the electricity network is an important consideration for applicants wanting to construct or extend generation plant. In the market system, it is for the applicant to ensure that there will be necessary infrastructure and capacity within an existing or planned transmission or distribution network to accommodate the electricity generated. The applicant will liaise with National Grid who own and manage the transmission network in England and Wales or the relevant regional Distribution Network Operator (DNO) to secure a grid connection. It may be the case that the applicant has not received or accepted a formal offer of a grid connection from the relevant network operator at the time of the application, although it is likely to have applied for one and discussed it with them. This is a commercial risk the applicant may wish to take for a variety of reasons, although the IPC will want to be satisfied that there is no obvious reason why a grid connection would not be possible"</i>.</p> <p>It is clear from the above paragraph, and is a matter of fact, that securing a connection agreement provides certainty to the applicant that sufficient capacity will be available in the NETS for the electricity generated by the project. NPS EN-1 paragraph 4.9.1 also makes clear that arranging the connection agreement "in the market system is a matter for the applicant" and that connection applications are a matter of "commercial risk" and not therefore, primarily, a matter for the Secretary of State on this application.</p>

I.D.	Stakeholder Comment	Applicant Response
		<p>Nonetheless, as fully set out in the Cable Statement [APP-282], a Grid Connection Agreement with National Grid has been secured thus making provision for the export of electricity generated by the project to the NETS. Therefore, it would be incorrect to state that the application was not in accordance with the above policy since there is no remaining commercial risk relating to the connection agreement secured, as a result of which the application is fully in accordance with paragraph 4.9.1 of NPS EN-1”.</p> <p>Information regarding East Anglia Green (EAG) is provided in the Applicant’s response to Q1.9.1.5 within The Applicant’s Responses to the Examining Authority’s First Written Questions [REP1-036] submitted at Deadline 1.</p> <p>As detailed in the Applicant’s response to Q1.2.3.1 within The Applicant’s Responses to the Examining Authority’s First Written Questions [REP1-036] submitted at Deadline 1, Section 1.1 of the ‘Pathway to 2030: Holistic Network Design’ (HND) report (NG ESO, 2022), which provided the first details of NG ESO’s recommended single, integrated network design for future offshore transmission assets, 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”. Given the well-developed stage of SEP and DEP, the projects fall out with the scope of the Pathway to 2030 workstream.</p> <p>The Applicant reiterates that it has already taken significant steps towards a coordinated approach between two separately owned offshore wind farms, as described in the Scenarios Statement [APP-314].</p>
<p>Mr Clive Hay-Smith</p>		

I.D.	Stakeholder Comment	Applicant Response
16	<p>Issues arising from the original project's cables:</p> <ul style="list-style-type: none"> • Mr Hay-Smith reported that for the first set of cables related to Sheringham Shoal he was very cooperative. <ul style="list-style-type: none"> ○ Received £3,800 compensation. ○ These cables have now been sold off to Frontier. • Mr Hay-Smith has been raising issues that were apparent for Sheringham Shoal and have been apparent throughout operation. • Mr Hay-Smith stated that the cables created an issue with field drainage but due to the transfer of cables to Frontier, Mr Hay-Smith does not know whom to contact. 	<p>The Applicant is aware of the concerns that have been raised in respect of the cables that serve the Sheringham Shoal wind farm. The ownership of these assets transferred in 2013, as part of the sale from Scira Offshore Energy Limited (SOEL) to BTSS (Blue Transmission Sheringham Shoal) as is governed and required under UK regulation. At this point, the responsibility for transmission assets became the responsibility of BTSS (OFTO). Howes Percival LLP have been advised that this is a matter for discussion with the OFTO.</p> <p>The Applicant is aware that Mr Hay-Smith has been in direct communication with BTSS and remedial work has been done in recent years.</p>
17	<p>Spring Beck Chalk Stream:</p> <ul style="list-style-type: none"> • Mr Hay-Smith is working on a programme regarding the Spring Beck chalk stream in co-operation with the Environment Agency and was informed that the impact on the stream is insignificant because it is being crossed by HDD. • Responses from the last hearings state that Equinor are happy with the methodology and surveys, but Mr Hay-Smith has requested a further ecological investigation of Spring Beck. 	<p>As per The Applicant's Responses to the Examining Authority's Second Written Questions [document reference 16.2] (Q2.13.3.1), the Applicant is aware of two separate (although related) management schemes that have been or are being undertaken to improve Spring Beck (also known as Weybourne Beck) with involvement from the Environment Agency:</p> <ol style="list-style-type: none"> 1. The Environment Agency undertook some floodplain enhancement and woody debris installation in the upper reaches of the Beck to improve habitat and reduce flood risk, which was completed in 2019. 2. The Norfolk Rivers Trust has developed a restoration plan, but this has not been published and is not directly mentioned on their website <p>It remains the Applicant's view that since the watercourse and floodplain would be crossed using horizontal directional drilling (HDD), the potential for direct impacts are avoided. Indirect impacts could still occur, but a site-specific hydrogeological risk assessment will be undertaken to inform the HDD design and impacts on the strata that directly support the river would be minimised on the basis of its outputs. This is secured via the Code of Construction Practice under Requirement 19 of the draft DCO (Revision F) [document reference 3.1].</p> <p>All watercourses within the DCO boundary would be re-appraised for their suitability for riparian mammals and white-clawed crayfish, as set out within</p>

I.D.	Stakeholder Comment	Applicant Response
		<p>the Outline Ecological Management Plan (Revision C) [document reference 9.19], secured under Requirement 13 of the draft DCO (Revision F) [document reference 3.1]. Any watercourses which are found to provide suitable habitat for these protected species, and which have not been previously surveyed (due to lack of survey access or because of a change in the suitability of the watercourse since the pre-application surveys, arising for instance from watercourse enhancement works), would be surveyed for the relevant protected species as part of the pre-construction surveys. This is captured in the Outline Ecological Management Plan (Revision C) [document reference 9.19] submitted at Deadline 3.</p>
<p>Alison Shaw (Weybourne PC – on behalf of Val Stubbs)</p>		
18	<p>Norfolk Parishes Movement for an Offshore Transmission Network:</p> <ul style="list-style-type: none"> • Norfolk Parishes Movement gave residents a voice against a developer the size of Equinor. • Being part of Norfolk Parishes Movement has allowed the pooling of resources and knowledge. 	<p>The Applicant acknowledges the comments and responds to further statements in the following rows:</p>
19	<p>Cumulative impact and health:</p> <ul style="list-style-type: none"> • Cumulative impact of wind farms is highly damaging and there is an impact on mental health due to the stress of the process. • Raised concern that as Hornsea Project 3 cut through hedgerows, which weren't scheduled to be replaced until the cable construction is complete, SEP and DEP will do the same. 	<p>The Applicant understands that the reference to the 'process' is the 'construction process'. Norfolk County Council also noted the potential for stress associated with the construction works [RR-064]. The Applicant responded in The Applicant's Responses to the Examining Authority's First Written Questions [REP1-036] as follows.</p>

I.D.	Stakeholder Comment	Applicant Response
		<p>Commitments are in place to ensure that local communities are able to contribute to the planning of SEP and DEP and, when necessary, to raise complaints. The Outline Code of Construction Practice (OCoCP) (Revision C) [document reference 9.17], secured by Requirement 19 of the draft DCO (Revision F) [document reference 3.1], will include reference to a Stakeholder Communications Plan to ensure effective and open communication with local residents and businesses that may be affected by the construction works (Section 2.4). The Outline Project Environmental Management Plan (PEMP) (Revision C) [document reference 9.10], sets out requirements for regular environmental meetings and debriefs local to the site where representatives from the Project Team, the Principal Contractor, and key sub-contractors will consider matters such as the status of outstanding items, reports of environmental incidents or complaints and stakeholder engagement (para 68). The OCoCP (Revision C) [document reference 9.17] specifies that a Local Community Liaison Officer will respond to any public concerns, queries or complaints in a professional and diligent manner as set out by a project community and public relations procedure which will be submitted for comment to the relevant planning authority (paragraph 30); and the Outline Project Environmental Management Plan (PEMP) (Revision C) [document reference 9.10] states that the final PEMP will detail the procedure in place to report public complaints in relation to offshore works (Section 6.4).</p> <p>As stated in the Outline Landscape Management Plan (OLMP) (Revision C) [document reference 9.18], approximately 4km of existing hedgerows would be temporarily removed to allow construction of the onshore cable corridor. Hedgerows that are removed will be replanted in the first planting season following the completion of duct installation and haul road removal. Additionally, hedgerow enhancement would be undertaken within the order limits and as agreed with landowners. This is secured via Requirement 11 of the draft Development Consent Order (Revision F) [document reference 3.1].</p>
20	<p>Ecology and climate change:</p> <ul style="list-style-type: none"> • Destruction of ecology is “disastrous”. 	<p>The Applicant has made, and will continue to make, great efforts to avoid and reduce as far as possible the cutting through of hedgerows that leads to their temporary removal over short lengths and then their replacement with additional planting to provide an overall enhancement. Cutting through</p>

I.D.	Stakeholder Comment	Applicant Response
	<ul style="list-style-type: none"> ○ Hornsea has recently cut through hedgerows, and they will not be replaced until construction is complete. ○ Equinor will also cut through hedgerows for SEP and DEP. ● Ms Stubbs stated the fact that climate change is more serious than first believed and as such it is not the time to be removing vegetation. 	<p>hedgerows is avoided by using a trenchless technique such as HDD and also at the pre-construction stage by 'micro-siting' those open trenches that cut a hedgerow line by using, where they are present, any existing gaps in the line of the hedgerow.</p> <p>The assessment of the overall effect of the project on greenhouse gas emissions in the Environmental Statement (ES) Chapter 4 Project Description Appendix 4.2 - Greenhouse Gas Footprint Assessment [APP-179] is that SEP and DEP would have a beneficial effect on greenhouse gas emissions and assist the UK's trajectory towards net zero in 2050.</p>
Alison Shaw (resident of Oulton)		
21	<p>Experience of other developers (Orsted and Vattenfall):</p> <ul style="list-style-type: none"> ● Oulton experienced several months of construction traffic travelling into residential areas which is against the requirements in the DCO. ● The necessary traffic signs at the compound were erected too late and had to be requested by Ms Shaw. ● Ms Shaw stated a preference for a white noise reversing sound rather than beeping for construction vehicles. ● Ms Shaw raised the issue of communities being forced to tell contractors the DCO mitigation requirements, as construction staff are not aware. 	<p>The Outline Code of Construction Practice (Revision C) [document reference 9.17] submitted at Deadline 3, includes a requirement that "vehicles should be fitted with low noise reversing warnings where possible". White noise reversing alarms are considered low noise reversing alarms, as white noise alarms are generally considered less likely to disturb people.</p> <p>DCO Requirements comprise legally binding controls and restrictions governing the manner in which the development should be carried out. If concerns are raised during the construction phase, as set out within the Outline Code of Construction Practice (Revision C) [document reference 9.17] submitted at Deadline 3, a Local Community Liaison Officer will respond to any public concerns, queries or complaints.</p>
22	<p>It is essential to fully agree on mitigation requirements before the end of the examination, as to do so afterwards would create risk for communities.</p>	<p>The Outline Code of Construction Practice (Revision C) [document reference 9.17] and the Outline Construction Management Plan (Revision C) [document reference 9.16] are secured by Requirements 19 and 15 respectively in the draft Development Consent Order (Revision F) [document reference 3.1] submitted at Deadline 3. Final details of some mitigation measures cannot be agreed until post-consent when further information about the detailed design of the projects and development scenarios is fully known. These documents ensure that the final mitigation</p>

I.D.	Stakeholder Comment	Applicant Response
		to be taken forwards is adequately controlled by the relevant local planning authority through the submission and approval of these management plans.
23	<p>Traffic impacts:</p> <ul style="list-style-type: none"> No traffic of any kind should travel through Attlebridge village. There should also be set limits on working hours and noise and vibration. 	<p>The Applicant has made a commitment to no HGV traffic travelling through Attlebridge. This commitment is contained within the Outline Construction Traffic Management Plan (OCTMP) (Revision C) [document reference 9.16] submitted at Deadline 3, which is secured via Requirement 15 if the draft Development Consent Order (Revision F) [document Reference 3.1] submitted at Deadline 3.</p> <p>Working hours are secured under Requirement 20 of the draft DCO (Revision F) [document reference 3.1]. Standard working hours are also specified in the Outline Code of Construction Practice (Revision C) [document reference 9.17] as “0700 hours and 1900 hours Monday to Friday, and 0700 hours to 1300 hours on Saturdays, with no activity on Sundays or bank holidays”. Construction works outside these hours may be required for the essential works listed in paragraph 65 of the Outline Code of Construction Practice.</p> <p>It is not best practice to include noise or vibration limits within the DCO. This is because the central mechanism for controlling construction noise and vibration under the Control of Pollution Act 1974 is that Best Practicable Means (BPM) is being employed to minimise noise and vibration. If limits are applied, the contractor could plan its works to generate noise levels up to those limits, which is not in accordance with BPM. As such, the imposition of limits introduces legal uncertainty and could be considered incompatible with BPM. Furthermore, noise level limits may not allow sufficient flexibility in planning works. For example, generating high noise levels for short periods of time, with some periods of respite, can minimise noise disturbance and may therefore be considered BPM. Noise level limits may render this measure impractical.</p>
24	Ms Shaw reported concern regarding the crossing of the River Bure which goes through Oulton. Stated that they may submit something regarding this at Deadline 3.	Comment noted.

I.D.	Stakeholder Comment	Applicant Response
25	All construction scenarios would present an unacceptable cumulative impact. Cables should go through the Wash and connect at Walpole.	<p>The assessment within each chapter of the ES was prepared on the basis of a worst-case scenario for each topic. This considered the following construction phase envelopes:</p> <ol style="list-style-type: none"> 1. Build SEP and DEP sequentially with a gap of up to four years between the start of construction of each Project – reflecting the maximum duration of effects; and 2. Build SEP and DEP concurrently reflecting the maximum peak effects. (see Section 9.2 of the Scenarios Statement [APP-314]). <p>Whatever phasing of construction is ultimately progressed will fall within this assessed envelope.</p> <p>The scope of the cumulative impacts assessment (CIA) (in terms of relevant issues and projects) has been established with consultees (including other developers) during the EIA process. The cumulative impacts of SEP and DEP in conjunction with other projects, including the Hornsea Three, Vanguard and Boreas, and A47 improvement projects, is included in the Environmental Statement (ES). Further information regarding this can be found in Section 5.8 of ES Chapter 5 EIA Methodology [APP-091].</p> <p>Having also identified which residual impacts assessed for SEP and DEP alone have the potential for a cumulative impact with the other plans and projects, the ES chapters go on to assess the potential for cumulative impacts using the standard industry approach of using residual effects as identified in the assessments of the other plans or projects. Please refer to the ES Chapters for details of each topic-specific CIA.</p> <p>As previously responded to in The Applicant's Responses to the Examining Authority's First Written Questions [REP1-036] WQ1.2.2, the CION Process is the mechanism used by National Grid to evaluate potential transmission options to identify the connection point in line with their obligation to develop and maintain an efficient, coordinated and economical system of the electricity transmission network. Further detail regarding the CION process and the resulting grid connection offer is provided in response to Q2.2.2.1 within The Applicant's Responses to</p>

I.D.	Stakeholder Comment	Applicant Response
		<p>the Examining Authority's Second Written Questions [document reference 16.2] submitted at Deadline 3.</p> <p>The Applicant is not in a position to comment on spare capacity at the Walpole Substation either historically, or now.</p>

References

Cave B, Fothergill J, Pyper R, Gibson G. Health and Environmental Impact Assessment: a briefing for public health teams in England. London, England: Public Health England, Public Health England. 2017. <https://www.gov.uk/government/publications/health-and-environmental-impact-assessment-guide-for-local-teams>

IAIA, EUPHA, Human health: ensuring a high level of protection. A reference paper on addressing Human Health in Environmental Impact Assessment as per EU Directive 2011/92/EU amended by 2014/52/EU. Fargo: International Association for Impact Assessment and European Public Health Association. 2020. [REDACTED]

IPH. Health Impact Assessment Guidance: A Manual and Technical Guidance. Dublin and Belfast: Institute of Public Health in Ireland. 2021. [REDACTED]

PHE. Health Impact Assessment in spatial planning. A guide for local authority public health and planning teams. London: Public Health England. 2020. <https://www.gov.uk/government/publications/health-impact-assessment-in-spatial-planning>