



Your ref: EN010109-000711-SADEP – WQ2  
Our ref: Sheringham and Dudgeon Extension Projects  
SADEP

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Date: 02 May 2023

via email: [sadep@planninginspectorate.gov.uk](mailto:sadep@planninginspectorate.gov.uk)

Dear Menaka,

**Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Project  
(EN010109): Written Statement**

**The Examining Authority's second written questions and requests for  
information (WQ2)**

I refer to your second written questions issued on 12 April 2023 regarding the above proposal and your invitation to submit written representations to the Examining Authority's (ExA) Written Questions as set out in the Rule 6 letter, Annex C [PD-006].

National Highway's responses are set out below and should be read in conjunction with the Statement of Common Ground between National Highways and Norfolk Vanguard which has been submitted to you by the applicant.

Please contact me [PlanningEE@nationalhighways.co.uk](mailto:PlanningEE@nationalhighways.co.uk) if you require any further information.

Yours sincerely,

S. H.

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# Sheringham Shoal Offshore Wind Farm Extension Project and Dudgeon Offshore Wind Farm Extension Project (EN010109)

## Written Statement by National Highways

**02 May 2023**

### 1.0 Introduction

National Highways (NH) have been invited (dated 12 April 2023) to provide written representations to the ExA's Second Written Questions for this project. The relevant questions to National Highways and our responses are set out below.

<b>Q2.11.2 Definitions</b>
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WQ2.11.2.2. **Pre-commencement works**

Following the discussion at ISH3 [EV-035, EV-040], Applicant to provide a joint position statement with LPAs to cover the following:

- a) how each of the activities that are excluded from the definition of commencement in dDCO are controlled, and parties' position whether or not control is required through the dDCO;
- b) whether there is the need for a definition for pre-commencement in the dDCO and provide wording for such a definition;
- c) including NCC as a consultee in R19; and
- d) other related changes to the wording of R19.
- e) NH and Applicant, confirm if the draft PPs for NH leaves a shortfall in terms of the protection required by NH, which would be covered by the outline CoCP.
- f) Does NH need to be listed in R19(1) as a consultee?

Response: Providing response for e) and f)

e) National Highways' view is that the Protective Provisions (PP) may leave a shortfall in terms of the protection required by National Highways (NH), which would be covered by the outline Code of Construction Practice (CoCP). National Highways confirms this statement.

f) Yes, National Highways requires to be listed in Requirement 19(1) as one of the Statutory Consultees so that NH can review and have an input into the Code of Construction Practice in relation to any works that affect the Strategic Road Network (SRN) or any land owned, occupied, or temporarily possessed by National Highways.

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority, and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

The Road Safety Audit (RSA) Stages 1 and 2, tasks on the SRN can be pre-commencement work prior to starting the construction of any proposed mitigation. For any RSA Stage 1 and/or 2, the National Highways procedure suits better those DMRB's Standards and Guidelines issued by the Departments for Transport (DfT). Therefore, it will be appropriate for National Highways to act as an 'Overseeing organisation' role, while completing any Road Safety Audit Brief (before) and Decision Log (after) in relation to the Strategic Road Network.

For the Code of Construction Practice (CoCP) task, if the National Highways name is not on that List of Consultees for Requirement 19(1), then there might be some delays in discharging any conditions or requirements which sets out by the Secretary of State Consent Order.

## **Q2.23.5 Suitability of Access Strategy**

### **WQ2.23.5.1. Abnormal Indivisible Loads**

NH has not been able to confirm the route for abnormal indivisible loads [APP-270] as there are two structures of concern (Scarning Bridge and a culvert located between Kings Lynn and Swaffham). Further, to NH reply [REP1-131, Q1.23.5.1] please provide an update on discussions on this matter.

Response: National Highways Reference: WYNL-35-S1 (A47 Kings Lynn to Dudgeon and Sheringham Offshore Wind Farm)

National Highways' consultant, Atkins, is currently working on this Scarning Bridge (Structure Key 7650). Our consultant will be issuing their report for the National Highways SES team's review and acceptance. Once this Scarning Bridge assessment is ready and issued to us, we will be sending an update to you by the Deadline 05 (dated 13 June 2023).

The structural reviews for West Bilney No 1 Culvert (Structure Key 1291 and extension 1292) found that the structure's condition has significantly deteriorated since the previous assessment, and its previous assessed capacity would only be valid once the crack has been repaired. The recommended proposal is to move the abnormal load into the opposite, westbound lane (moving the load away from the damaged wall), so that the load distribution remains within the undamaged part of the overall structure.

It has been agreed between the parties that abnormal load movements can be dealt with post consent through the development of the CTMP and established ESDAL processes (Electronic Service Delivery for Abnormal Loads). Engagement will also be required with the A47 scheme major project teams and other major offshore wind farm developers to proactively understand risks to and programme abnormal load movements around the A47 works and other abnormal load movement needs, not solely rely on the ESDAL process.

## **Q2.23.6 Effectiveness of Proposed Mitigation Measures**

### **WQ2.23.6.1. Mitigation - A47**

At ISH3 [EV-037] [EV-042], it was noted that NH are seeking some clarifications in terms of how the OCTMP [REP1-021] and that the impacts of the potential overlap of construction with the A47 Tuddenham to Easton improvement scheme would be managed. Parties provide an update on such discussion and whether NH is content that such matters can be suitably addressed in the OCTMP.

Response:

National Highways have outlined in this response their view in regards to Equinor's Outline Construction Traffic Management Plan (OCTMP), Revision B, ([REP1-021](#)) and the impacts of the potential overlap of construction with the A47 North Tuddenham to Easton improvement scheme (the 'A47 Tuddenham Scheme').

National Highways have also noted that Equinor's material change request relates to changing access into the Food Enterprise Zone in response to changes to reflect the position of their new access off Church Lane. We have also noted that the Norwich Western Link (NWL) road scheme is illustrated on Sheet 25 of documents 2.9 Access to Works Plan, Revision D, ([AS-051](#)) and 2.10 Streets (to be temporarily stopped up) Plan, Revision C, ([AS-052](#)) with allocated DCO construction traffic management powers to manage their interaction.

On Sheet 30, the A47 Tuddenham Scheme is not illustrated and as a consequence we have identified possible areas of concern relating to how Equinor's DCO will manage the challenges that may occur when crossing the new A47 Tuddenham Scheme during and post construction. The A47 Tuddenham Scheme received consent in August 2022 under the [A47 North Tuddenham to Easton DCO as Made by the Secretary of State](#), following an Examination period that started in April 2021. National Highways engaged with Equinor during 2020 to raise awareness of the scheme and shared preliminary design information. As Equinor's scheme was still in early development, at a meeting on 15 April 2021 the A47 team updated in the meeting the examination position of the National Highways scheme, as well as landowner and potential launch pit location considerations specific to the Food Enterprise Partnership. The Equinor team updating their current scheme position, the National Highways A47 Project Team invited Equinor to engage with them when they felt necessary to ensure the A47 Tuddenham Scheme was duly reflected in their application.

However, the National Highways A47 Major Project Team were not contacted by Equinor since that meeting and recently initiated a meeting on 20 April 2023 to discuss concerns about their DCO application. Following that meeting Equinor acknowledged the need to enter into a Legal agreement similar to that between National Highways and Orsted for the Hornsea Project Three DCO wind farm cable crossing of the A47 Tuddenham Scheme.

However, National Highways are submitting this note to draw the Planning Inspector's attention to these matters so they can be formally considered within the formal Examination process. Meanwhile, National Highways will work with Equinor to help them record these and any associated mitigation actions in their Statement of Common Ground with National Highways.

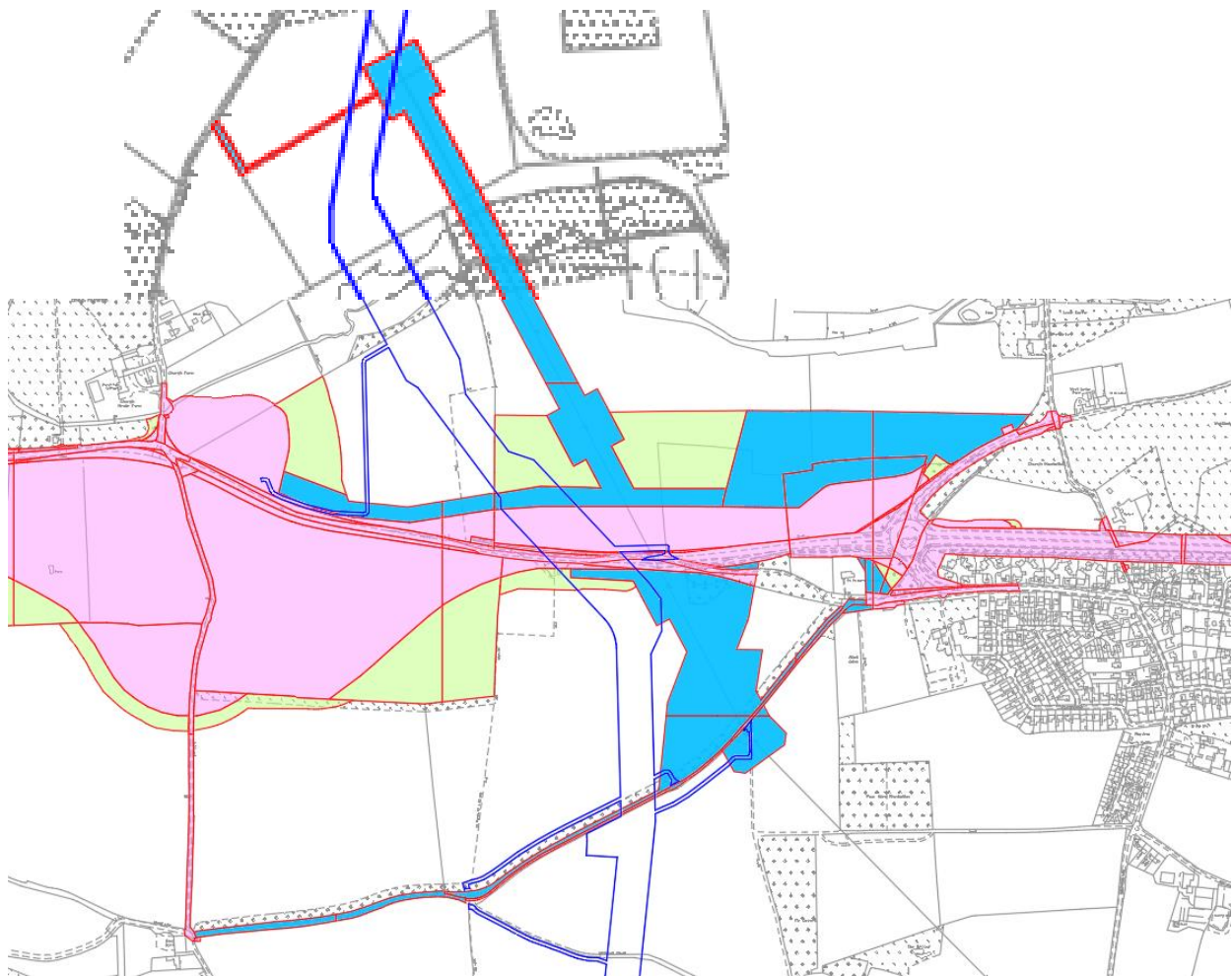
In summary, this note explores the interaction of Equinor's Sheringham and Dudgeon Extension Projects DCO with the approved National Highways' A47 DCO Schemes with regards:

- A. Permanent land ownership and rights changes
- B. Construction work access
- C. Scheme design and utility infrastructure interaction
- D. A47 and local road network

## **A) PERMANENT LAND OWNERSHIP AND RIGHTS CHANGES**

### ***Overview***

Figure A, below, illustrates the extent of physical overlap between the Sheringham and Dudgeon Extension Projects DCO application and the approved A47 North Tuddenham to Easton DCO. It also shows the extent of Secretary of State approved rights, applied for in March 2021 and approved in August 2022, to compulsorily acquire land permanently (pink), for new rights (blue) or temporary occupation (green).



**Figure A** Equinor's DCO corridor (navy blue outline) over A47 Tuddenham Scheme's DCO Land Plans

The following is a summary of the key challenges this overlap presents to National Highways' ability to meet their legal obligations under the A47 North Tuddenham to Easton DCO.

### ***Taverham Road Access***

#### **Construction Access Corridor**

Figure B below shows Equinor's proposed access off the realigned Taverham Road clashes with new permanent property boundary fence line and hedgerow with trees proposed within the A47 Tuddenham Scheme's Environmental Masterplan, Revision 4<sup>1</sup>. This Environmental Masterplan is an approved A47 Tuddenham DCO certified document that illustrates the landscape design approved by the Secretary of State. Approval of this DCO access route for Equinor would prevent National Highways being able to establish and maintain these landscape features, along with the need to provide a secure barrier between the private farmland to the north and the new public cycle track to the south.

National Highways recognises and supports the logic of the proposal to provide access from the realigned Taverham Road post construction of the A47 Tuddenham Scheme. However, the Sheringham and Dudgeon Extension Projects DCO Order limits do not reflect the new land acquisition boundary change and assumed intent to create an access route north of the new A47 along the southern edge of the retained agricultural field.



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**Figure B** Equinor's construction access over A47 Tuddenham Scheme's DCO Land Plans

#### **Operational Access**

Though we understand Equinor are seeking to agree operational inspection and maintenance access via private land agreements, the comments above regarding the construction access corridor from Taverham Road are also important to note with regards acquiring operational access. The A47 Tuddenham Scheme will be permanently closing access from the A47 to the north onto Church Lane, Easton.

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<sup>1</sup> A47 Tuddenham Scheme's Environmental Masterplan, Revision 4, is available at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010038/TR010038-001579-Highways%20England%20-%20Other-%20Amended%20DCO%20application%20document%2015.pdf>

Therefore, the above construction access route off the realigned Taverham Road is the only alternative long-term means to access Equinor's cable corridor between the A47 and River Tud with large plant, without travelling via several narrow country lanes to an eastern access point from Ringland Road.

### ***Third Party Rights Transfer***

Under the approved A47 Tuddenham DCO, powers to permanently acquire new land or new rights will introduce to the areas overlapping with the Sheringham and Dudgeon Extension Projects DCO additional third-party interests, including new statutory utility interests that will need protections within Equinor's DCO Protective Provisions. These are summarised below.

#### Norfolk County Council

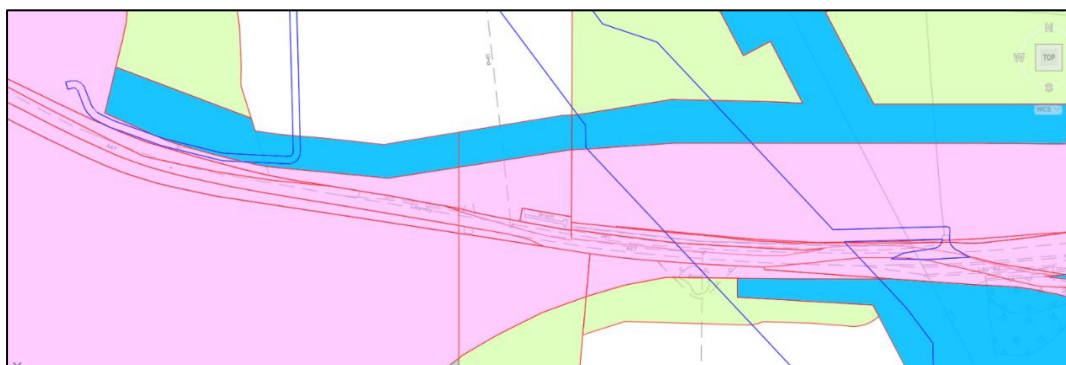
The pink east-west corridor in Figure A, above, reflects the permanent land acquisition for the new A47 Tuddenham Scheme. This corridor includes provision of a new cycle track parallel to the north side of the dual carriageway. It is proposed that post construction of the A47 dual carriageway, this cycle track and the land to the north up to the new permanent land property boundary will be transferred to the ownership of Norfolk County Council, who will maintain the cycle track as part of the local cycle network.

#### Statutory Utility Authorities

New Statutory Utility routes for Water, Communications and Electricity services are proposed under the alignment of the new cycle track and north-south across the new A47 to connect with existing utility assets south of the existing A47, within the northern extent of land owned by the Food Enterprise Partnership.

#### Orsted's Hornsea Project Three DCO

Under the approved A47 Tuddenham DCO, National Highways have committed to providing new rights for Orsted to create a temporary construction haul route and long-term operational/maintenance access right from the realigned Taverham Road to their Hornsea Project Three DCO corridor between the A47 and the River Tud. This right would be located within the blue east-west corridor north of the new A47 (pink east-west corridor) shown in the below Figure C.



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**Figure C** Orsted's new east-west access corridor (blue) north of the new dual carriageway corridor (pink)



The Sheringham and Dudgeon Extension Projects DCO would cross the Orsted blue corridor north-south in two locations, as shown above. National Highways would refer to the above point about Equinor needing to realign their Taverham Road construction haul route access and recommend they engage with Orsted and the affected landowner(s) to maximise use of the same construction haul route to minimise environmental and land use impacts. However, National Grid would also require the Protective Provisions within the Sheringham and Dudgeon Extension Projects DCO to reflect the need to maintain and protect Orsted's existing right to legal access along this corridor through the approved A47 DCO.

**Equinor's Book of Reference**

Table A below lists those land parcels in Equinor's document 2.3 Land Plans, Revision D, ([AS-048](#)) that overlap with the A47 Tuddenham Scheme. In addition, the table illustrates how National Highway's land interests are reflected in Equinor's 4.1 Book of Reference, Revision D, ([AS-058](#)) compared to those rights approved under the A47 Tuddenham Scheme.

It is worth noting in Equinor's 4.1 Book of Reference, Revision D, that Plot 27-005 records National Highways as having a CAT2 interest in respect of right of access to lay and maintain apparatus. However, Plot 27-005 lies outside the A47 North Tuddenham to Easton DCO Order Limits and is within private third party land.

In light of the above, National Highways requests their legal land interests are checked and correctly reflected in Equinor's 4.1 Book of Reference, Revision D.

Equinor Plots Overlapping with A47 Scheme		A47 DCO Scheme
Plot Number	Registered National Interest	Approved Compulsory Acquisition Powers
27-004	None	New Rights
27-006	NH a CAT2 in respect of right of access to lay and maintain apparatus	Permanent and New Rights
28-003	None	Permanent, New Rights and Temporary
28-002	CAT1 owner interest	Permanent
28-003	None	Permanent
28-004	CAT1 owner interest	Permanent
28-005	CAT1 owner interest	Permanent
28-006	None	Permanent
28-007	CAT1 owner interest	Permanent
28-008	CAT1 owner interest	Permanent
28-009	None	Permanent
28-010	CAT1 owner interest	Permanent
28-011	None	New Rights and Temporary

Equinor Plots Overlapping with A47 Scheme		A47 DCO Scheme
Plot Number	Registered National Interest	Approved Compulsory Acquisition Powers
28-014	None	New Rights
28-015	None	New Rights
28-016	None	New Rights
28-017	None	New Rights
28-023	NH a CAT2 in respect of right of access to conduct works to maintain A47	New Rights
28-024	NH a CAT2 in respect of right of access to conduct works to maintain A47	New Rights
28-025	None	New Rights
28-027	NH a CAT2 in respect of right of access to conduct works to maintain A47	New Rights

**Table A** Equinor's Book of Reference coverage of National Highways A47 Tuddenham Scheme DCO Rights

## **B) CONSTRUCTION WORK ACCESS POINTS AND WORK AREAS**

National Highways acknowledges that several construction access points off the A47 are proposed on Sheet 30 of documents 2.9 Access to Works Plan, Revision D, ([AS-051](#)) and 2.10 Streets (to be temporarily stopped up) Plan, Revision C, ([AS-052](#)).

We support the approach to cater for access off the existing A47 in the event of a worst case scenario that the A47 Tuddenham Scheme is never constructed, whilst also allowing for an access off the realigned Taverham Road post construction of the A47 Tuddenham Scheme.

However, National Highways wish to raise the following concerns for consideration by Equinor:

- Sheringham and Dudgeon Extension Projects DCO Order Limits assume public highway access rights to a new private field access off Taverham Road. This has created two problems based on assumptions not previously explored with the A47 Major Projects Team:
  - The access Taverham Road side of that field gate is all part of the adopted public highway, even though the realigned Taverham Road itself and the public cycle track off Taverham Road do not extend along the stub to this field gate. The extent of adopted highway in this location remains to be verified as part of future handover of the side roads and cycle track to Norfolk County Council, so any assumption should have included a precaution that part of the track road side of the gate remained private land.
  - The exact position of the gate and access stub would not change during Examination nor detailed design within the limits of the approved DCO.

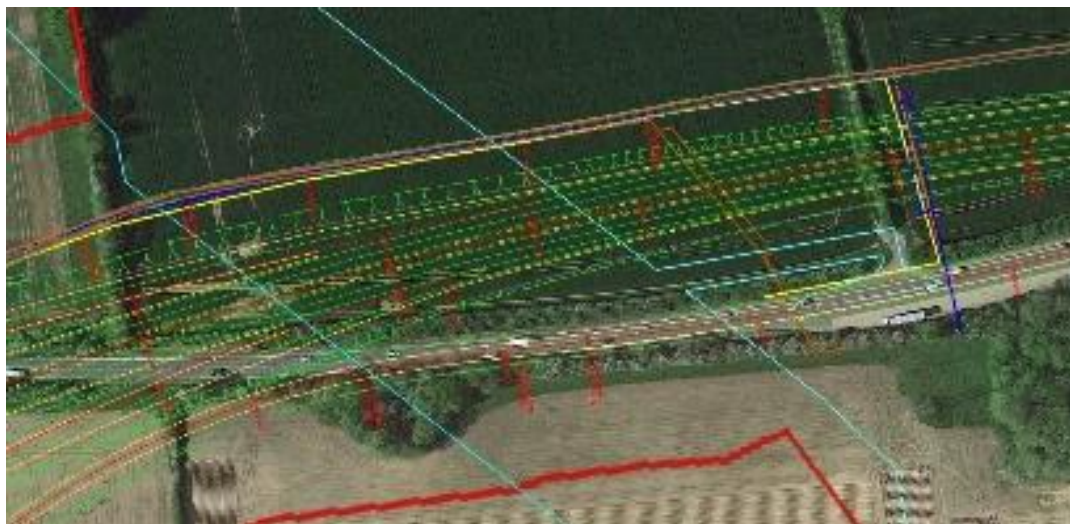
However, localised adjustments were made in response to Examination queries to ensure sufficient space is provided in the design for Orsted's large vehicles to access this field from the realigned Taverham Road. As illustrated in Figure D below, the field gate is proposed between the green lines in the location of the red dot. Consequently, the Sheringham and Dudgeon Extension Projects DCO Order Limits would currently not permit access over a small area of private land to reach to field access gate to Taverham Road.



Aerial Data Source: Google Maps, 2023

**Figure D** Equinor's Order Limits (light blue line) vs A47 Tuddenham Scheme's new field access to the realigned Taverham Road

- Access north of the A47 during construction:
  - As illustrated in Figure E below, once construction commences on the A47 Tuddenham Scheme, Equinor could not use the proposed access points off the existing A47 to access their work area between the A47 and River Tud.
  - However, these access points will be removed at the start of the A47 Tuddenham construction period, while the alternative access from Taverham Road will not be available for use until nearer the end of the A47 Tuddenham construction period – a period of approximately 2 years.



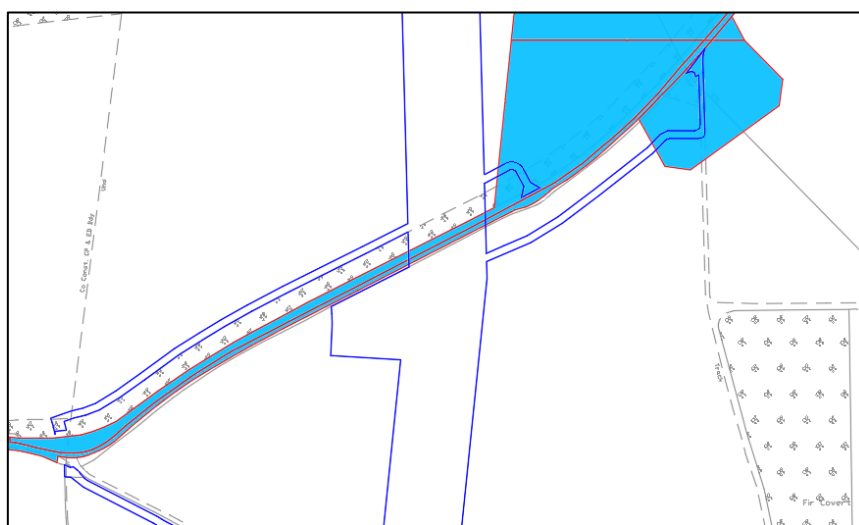
Aerial Data Source: Google Maps, 2023

**Figure E** Equinor's Order Limits (light blue line) access of existing A47 vs A47 Tuddenham Scheme

- The Orsted Hornsea Project Three also requires access between the A47 and River Tud plus cannot use the new realigned Taverham Road access

until it is ready. However, both the National Highways and Orsted DCOs allow for access from the east via the A47 Easton Roundabout and Church Lane. This access route will not be removed until near the end of the A47 Tuddenham construction period, thereby allowing National Highways to create the new western access from the realigned Taverham Road for Orsted and thereby never prohibiting Orsted access to their DCO work area.

- Though National Highways are seeking to commence construction as soon as possible, legally the A47 Tuddenham Scheme DCO Requirement 2 only requires the authorised development to commence no later than the expiration of 5 years beginning with the date that the Order came into force (i.e. before 12 August 2027).
- Therefore, National Highways recommends Equinor considers the implications to their construction programme of a 2 year period of no access to this part of their scheme or if access from Church Lane in the east is required to mitigate the risk.
- Access off Church Lane, Easton, south of A47:
  - The A47 Tuddenham Scheme includes the installation of a new Communications utility service line (primarily overhead) along Church Lane, Easton, south of the A47.
  - Figure F below shows the Sheringham and Dudgeon Extension Projects DCO against the A47 Tuddenham Scheme extents. The new utility service installation would require measures to temporarily alter and/or protect the utility service line to create and use the temporary access points proposed north or south off Church Lane for large vehicle access (e.g. HGVs with cable drums).



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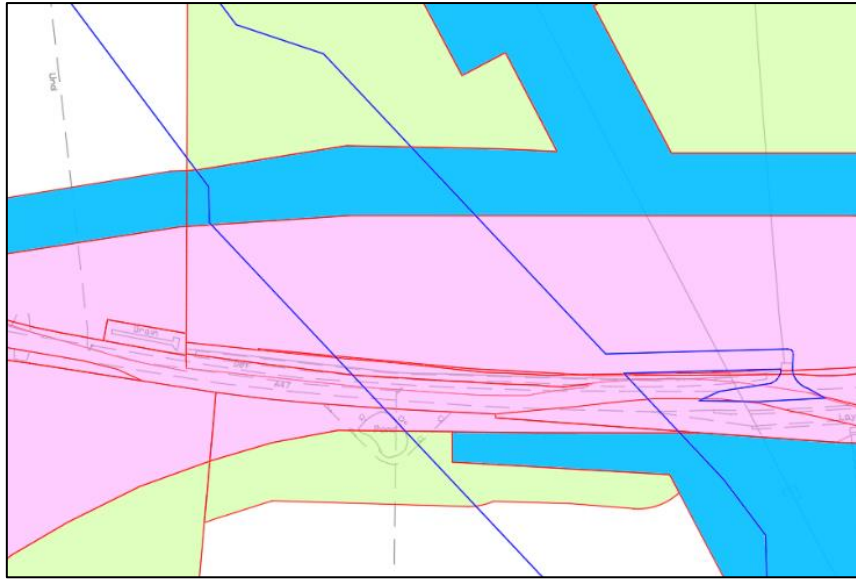
**Figure F** Equinor's Order Limits (navy blue outline) accesses off Church Lane and A47 Tuddenham Scheme (solid blue areas)

### **C) SCHEME DESIGN AND UTILITY INFRASTRUCTURE INTERACTION**

During our meeting with Equinor on 20 April 2023, National Highways outlined some design interaction concerns and that we have a Legal Agreement with Orsted's Hornsea Project Three relating to the exchange of design information and regular notification of programme and progress updates to proactively manage construction programme and design interactions. National Highways welcomed Equinor's response to explore entering into a similar agreement and to ensure the A47 Tuddenham scheme design is accommodated by Equinor in the future development of their designs. National Highways would also be seeking appropriate controls within the Sheringham and Dudgeon Extension Projects DCO Protective Provisions.

Where the Sheringham and Dudgeon Extension Projects DCO crosses the existing A47, the A47 Tuddenham Scheme will create a new dual carriageway and segregated cycle track north of the existing A47 (Figure G). This will involve changes in the existing ground levels combined with installation underground of new water, communications and electricity statutory utilities crossing east-west and north-south in this location. Therefore, Equinor's cable crossings will need to be designed to ensure sufficient depth to avoid direct and future settlement risk damage to both the new A47 carriageway, drainage assets, utility assets, cycle track and existing A47; this depth has been proposed within Article 4 of National Highways' Protective Provisions submitted at Deadline 3 for inclusion within the Sheringham and Dudgeon Extension Projects DCO.

It was also noted that the Sheringham and Dudgeon Extension Projects DCO Order Limits corridor is wider north and south of the existing A47 to facilitate laying of ducts and cables under the existing A47. This area also appears centralised over the existing A47 as if to provide equally working space north and south of the existing A47. However, the new A47 Tuddenham Scheme would permanently fill most of the widened area north of the existing A47. National Highways recommend Equinor review whether their Order Limits continue to provide sufficient working space north of the A47 Tuddenham Scheme's new infrastructure plus landscape planting required to meet the landscape design approved as part of the A47 Tuddenham DCO Requirement for the landscape design.



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**Figure G** Equinor's cable crossing work area (light blue outline) vs A47 Tuddenham Permanent Landtake (pink area) Containing Existing A47, New A47 Dual Carriageway and new Blue Cycle Track

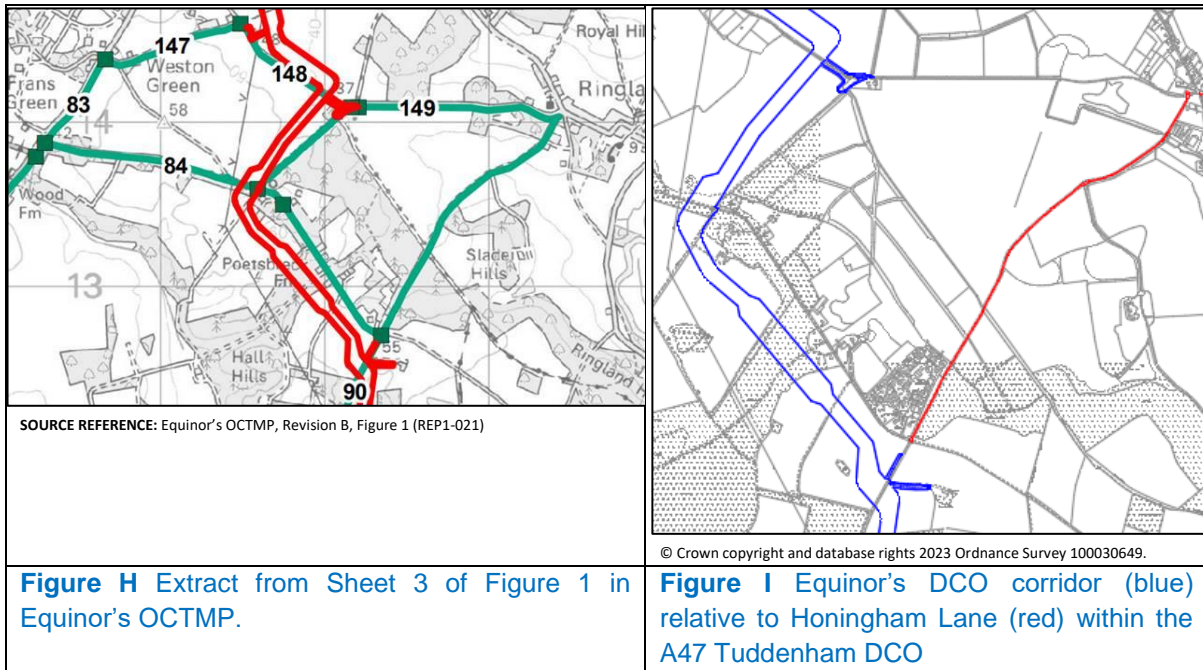
#### **D) A47 AND LOCAL ROAD NETWORK CLOSURES AND RESTRICTIONS (PERMANENT AND TEMPORARY)**

The following highlights how the A47 schemes may interact with the Sheringham and Dudgeon Extension Projects DCO across the wider Norfolk road network if their construction programmes were to overlap.

##### ***Honingham Lane Temporary Traffic Regulation Order***

The A47 Tuddenham Scheme includes a commitment to close Honingham Lane, south-west of Ringland, to through-road traffic until the Norwich Western Link (NWL) Road opens for traffic. This is a DCO commitment to mitigate the risk of increased traffic passing through Ringland to access to new Norwich Road Junction until the NWL Road is operational.

Figure 1 in Equinor's OCTMP, Revision B, ([REP1-021](#)) shows the proposed construction HGV routes. Route number 149 on Sheet 3 proposes use of Honingham Lane as an HGV construction route; see Figures H and I below. National Highways recognise that Equinor will be engaging with Norfolk County Council to respond and adapt their final CTMP to reflect actual road availability during construction. However, we recommend reassurance is sought that the current OCTMP and associated traffic impact assessment can accommodate this long-term temporary road closure and any change in HGV and other local road user traffic movements on other roads if this closure was to occur during Equinor's temporary road closures along routes 84, 90 and 148 (see Figure H below).



### **Wider Road Network Construction Traffic Management**

National Highways has three DCOs that will create temporary closures or abnormal load restrictions along the A47 corridor between Dereham west of the Norwich and Great Yarmouth – A47 North Tuddenham to Easton DCO; A47 Thickthorn Junction DCO and A47 Blofield to North Burlingham DCO. There are also several other major developers seeking to manage their construction traffic movements within the same finite road network capacity without significantly affecting journey times and/or limited windows for abnormal load movements. In addition, National Highways' and other approved DCOs require compliance with Secretary of State approved traffic management plans based on defined construction programmes.

National Highways acknowledge there are procedures in place for Equinor to liaise with relevant highway authorities to manage the impacts of road closures and abnormal load movements along the local and regional road networks. However, National Highways would recommend not relying on the highway management processes, such as the Electronic Service Delivery for Abnormal Loads process, alone nor engaging with relevant authorities and other major developers in isolation.

National Highways would recommend Equinor facilitate collaborative meetings with National Highways, Norfolk County Council and other major wind farm developers when developing their CTMP and construction programme post DCO award to accommodate existing commitments and maximise opportunities to align activities and programmes to minimise road network and local community disruption.

### **Construction Traffic Management Plan Mitigation**

Further to the above, National Highways note the below line in Equinor's document 9.16 Outline Construction Traffic Management Plan, Revision B, ([REP1-021](#)):

#### *“4.11.2 Highway Schemes*

*118. With regards to the Highway Schemes, due to uncertainties regarding the timings of the start of construction (of these schemes), it was agreed with NCC and National Highways (NH) that potential cumulative impacts between the construction phases of the highway schemes and SEP and DEP would be managed through the respective CTMPs.*

*119. It is therefore proposed, that should the finalised construction programmes for the highway schemes highlight a potential overlap, the CTMPCo will engage with the relevant highway authorities to agree mitigation measures where appropriate. Mitigation measures could include for example, the respective projects committing to a programme of works that ensure peak traffic movements do not overlap.”*

This above yellow highlighted text appears to imply Equinor are committing National Highways to adapting their A47 construction programmes and traffic movements as part of Equinor's mitigation strategy.

National Highways request that Equinor amend this statement in their OCTMP to acknowledge that the National Highways A47 schemes already have an approved DCO and will have made programme and construction traffic commitments as part of their discharge of their DCO Requirements related to traffic management. Therefore, though National Highways support the notion of working with Norfolk County Council, Equinor and other major developers to manage traffic on the road network, National Highways will already be legally restricted in their ability to adapt to cater for Equinor's needs. Therefore, as the Sheringham and Dudgeon Extension Projects DCO remains to be consented, it would be primarily for Equinor to adapt their traffic management regime and construction programme to work around existing approved DCO scheme commitments.

### **Informative:**

The draft Statement of Common Ground (SoCG) has been prepared by Equinor New Energy Limited (the Applicant) and National Highways. Most of those points mentioned above in the 'A47 Mitigation' section, have communicated to Equinor by National Highways A47 major projects team at a recent meeting held on 20 April 2023.

National Highways A47 major projects team invites the Applicant to enter into a Cooperation Agreement and a legal contract, to resolve any outstanding issues. We are expecting further follow-up discussions will be required.