



Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects

The Applicant's Comments on Post-Hearing Submissions

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1 The Applicant's Comments on Post-Hearing Submissions

1. Following the publication of post-hearing submissions, including written summaries of oral submissions to the hearings by the Examining Authority (ExA), the Applicant has chosen to comment on the responses provided by some of the Interested Parties and these are detailed in **Table 1 - Table 11** below.

Table 1 The Applicant's Response to Alison Shaw's Deadline 3 Submission [REP3-164 and REP3-165]

ID	Stakeholder Comment	Applicant Response
Alison Shaw Deadline 3 Submission Part 1 [REP3-164]		
1	Speaking as a resident of Oulton, we have now experienced over several months the setting up of Orsted's huge Main Construction Compound in our midst and the difficulties of policing the project traffic that already occasionally strays into the residential end of Oulton Street contrary to the DCO and dreading the increase in such issues, as the cable trench construction gets underway in earnest very soon	The Applicant acknowledges the comments at ID 1-16 of this document. The Applicant is not in a position to comment on the projects or activities of another party and does not consider submissions relating to another parties' activities as relevant to the examination of the SEP and DEP DCO application. Where information is relevant to SEP and DEP a response or signpost to previous submissions has been included where applicable.
2	Getting effective signage and at the right locations around the parish e.g. No Access for Hornsea 3 traffic has been a battle and was very late in being put in place.	
3	We have had to have an urgent meeting with Orsted's main contractors - who mean well, we feel - but their focus is of course on their construction imperatives - and the effects of their activities on the local residents who will have to live alongside their daily operations for at least the next 4 years is in effect an afterthought.	
4	The issue of the unacceptability of beeping reversing alarms (as opposed to the white noise version) is an ongoing debate - but one which we shall have to win, if we are not going to go mad.	
5	Now Vattenfall's main contractors have turned up and begun to establish the Vanguard and Boreas Central Works Compound directly opposite Orsted's - and sharing the southern end of Oulton Street as their access road. We noticed their construction vehicles coming through the residential end of The Street almost immediately and when I visited the site to speak with the workforce, they cheerfully told me that they had no idea that they weren't allowed to come through the village - Nobody told us! and they were only very dimly aware, of course, of what a DCO might even be.	
6	So now we have to start all over again with Vattenfall and force them to carry out their responsibilities under the requirements of their DCO.	

ID	Stakeholder Comment	Applicant Response
7	This has been a disappointing and scary start to our experience on the ground of the end result of all the forensic hard work that goes on during the 6-month period of an NSIP examination.	
8	Apart from providing the Panel with a graphic illustration of some of the real problems of the cumulative impacts of these projects with each other, I do not put these experiences before you tonight in order to invalidate this current Panel's activities on the contrary, I describe them in order to highlight the vital importance of the detailed work of mitigation that you are now engaged in.	
9	It appears that we, as communities, are forced to explain the planning conditions to each contractor in turn - a job that should in itself be made a requirement of the developer, within their DCO but just imagine how powerless we would be, if we did not at least have these requirements secured in the DCO, often with great difficulty, to point to.	The Applicant explained at Issue Specific Hearing 2 that in terms of enforceability of the DCO, it would be for the relevant local planning authority to enforce on the grounds that they think it is expedient to do so (see ID9a of Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 2 [REP1-032]). The Applicant also noted that compliance with all relevant consents, permits and licenses would be contractually secured between the undertaker(s) and appointed contractors. The Applicant also pointed out that a breach of the DCO (without reasonable excuse) is a criminal offence under section 161 of the Planning Act 2008.
10	It is essential, therefore, to thrash out these mitigating requirements before the close of the examination as leaving anything controversial to be settled post-consent lays communities, businesses and individuals wide open to the full negative impacts of construction.	
11	<p>The village community of Attlebridge, forced to host the SEP/DEP Main Construction Compound deserves your full attention in terms of:</p> <ul style="list-style-type: none"> - No traffic of any kind associated with the project, including staff vehicles, being allowed through the village; - Suitable restrictions on working hours; - Restrictions on noise, vibration and emissions. 	<p><i>Traffic Matters</i></p> <p>The Applicant has committed to not routing HGV traffic through Attlebridge village. This commitment is contained within the Outline Construction Traffic Management Plan (Revision C) [REP3-062] which is secured via Requirement 15 of the Draft Development Consent Order (Revision F) (Clean) [REP3-009]. With regard to light vehicles (such as staff vehicles), the Applicant refers to its response to Q2.23.6.2 contained within The Applicant's Responses to the Examining Authority's Second Written Questions [REP3-101].</p>

ID	Stakeholder Comment	Applicant Response
		<p><i>Working Hours</i></p> <p>Working hours are secured by Requirement 20 of the Draft Development Consent Order (Revision F) [document reference 3.1] as follows:</p> <p>20.—(1) Construction work for the onshore works must only take place between 0700 hours and 1900 hours Monday to Friday, and 0700 hours to 1300 hours on Saturdays, with no activity on Sundays or bank holidays, except as specified in paragraphs (2) to (4).</p> <p>(2) Outside the hours specified in paragraph (1), construction work may be undertaken for essential activities including but not limited to— (a) continuous periods of operation that are required as assessed in the environmental statement, such as concrete pouring, drilling, dewatering, cable jointing and pulling cables (including fibre optic cables) through ducts; (b) delivery to the onshore works of abnormal loads that may otherwise cause congestion on the local road network; (c) works required that may necessitate the temporary closure of roads; (d) onshore works requiring HDD; (e) onshore works at the landfall; (f) commissioning or outage works associated with the National Grid substation connection works; (g) electrical installation; or (h) emergency works.</p> <p>(3) Outside the hours specified in paragraph (1), construction work may be undertaken for nonintrusive activities including but not limited to— 69 (a) fitting out works within: (i) the onshore HVAC substation buildings comprised within Work Nos. 15A and 15B in the event of scenario 1 or scenario 2; or (ii) the integrated onshore substation building comprised within Work No. 15C in the event of scenario 3 or scenario 4; and (b) daily start up or shut down. (4) Save for emergency works, full details, including but not limited to type of activity, vehicle movements and type, timing and duration and any proposed mitigation, of all essential construction activities under paragraph (2) and undertaken outside of the hours specified in paragraph (1) must be agreed with the relevant planning authority in writing in advance, and must be carried out within the agreed time.</p> <p><i>Noise and Vibration</i></p> <p>Construction noise and vibration activities at the main compound are assessed in ES Chapter 23 Noise and Vibration [APP-109], concluding</p>

ID	Stakeholder Comment	Applicant Response
		<p>that, following the implementation of mitigation measures to be specified in the Construction Noise and Vibration Management Plan (CNVMP), residual impacts will be not significant. The CNVMP will be included in a final Code of Construction Practice, which will be based on the Outline Code of Construction Practice (Revision D) [document reference 9.17]. Preparation of the final CoCP is secured by Requirement 19 of the draft DCO (Revision F) [REP3-009].</p> <p>With respect to the proposed compound in Attlebridge itself, in addition to the commitment to provide a Construction Noise and Vibration Management Plan, the Outline Code of Construction Practice (Revision D) [document reference 9.17] also includes the following commitment: "The Contractor will obtain prior consent from Broadland District Council under Section 61 of the Control of Pollution Act 1974 for the proposed main construction compound." The Section 61 prior consent is a legal agreement between the construction contractor, employer and local authority that the specified noise and vibration mitigation and monitoring measures therein will be implemented. This provides sufficient protection for residents of Attlebridge from noise and vibration from the compound, in accordance with the obligations under the Control of Pollution Act 1974.</p>
12	<p>Finally, I would like to endorse everything that has been said by others this evening about the unacceptability of the cumulative impacts of the SEP/DEP project, under almost all the scenarios in its own proposal, but certainly and unequivocally when taken in combination with the impacts of Orsted and Vattenfall, throughout this county.</p>	<p>As set out in ES Chapter 5 EIA Methodology [APP-091], the Environmental Statement considers the potential for impacts on a receptor which may occur on a cumulative basis between SEP and DEP and other projects, activities, and plans. The Cumulative Impact Assessment (CIA) has been undertaken as part of each topic impact assessment, with specific methodology and outcomes presented within each technical chapter.</p> <p>The scope of the CIA (in terms of relevant issues and projects) was established with consultees (including other developers) as the Environmental Impact Assessment progressed.</p> <p>The Applicant has nothing further to add at this stage.</p>
13	<p>Here in the Holt, Kelling and Weybourne area of course, it would be adding insult to injury to inflict this pain on them yet again, after the initial disruption</p>	<p>The Applicant refers the ExA to the response to Q2.2.2.1c within The Applicant's Responses to the Examining Authority's Second Written</p>

ID	Stakeholder Comment	Applicant Response
	of the original Sheringham and Dudgeon projects, followed by Orsted, all making landfall right here.	<p>Questions [REP3-101], and to NGESO's response to the Examining Authority's First Written Questions (Q1.2.2.3) [REP1-188], which explain why Walpole did not make the shortlist of sites taken forward after initial consideration.</p>
14	How much better it would be for the developer, as well as for the environment and communities of Norfolk, if these projects were to go, via a seabed cable, straight through the Wash, and connect to the grid at Walpole.	
15	I urge the Panel to persist in their questioning of the Applicant and of National Grid in all its relevant incarnations - as to exactly why this solution cannot now be embraced.	
16	And we thank you for your endeavours.	
<p>Alison Shaw Deadline 3 Submission Part 2 [REP3-165]</p>		
17	Submission from Alison Shaw to the examination of SEP/DEP at Deadline 3 on May 2nd 2023.	<p>The Applicant acknowledges the submission and refers the ExA to its response to Q1.2.3.1 within The Applicant's Responses to the Examining Authority's First Written Questions [REP1-036] where details regarding the offshore transmission network review (OTNR) and the position of SEP and DEP within that process are provided. As stated, given the well-advanced stage of SEP and DEP the projects fall within the scope of the Early Opportunities workstream and not the Holistic Network Design (HND) Pathway to 2030. 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>The Applicant also refers the ExA to its response to Q1.9.1.5 within The Applicant's Responses to the Examining Authority's First Written Questions [REP1-036] for information regarding East Anglia Green (EAG). The Applicant reiterates that the grid connection offer for SEP and DEP that was signed in 2019 is not conditional upon the delivery of the EAG project.</p> <p>The Applicant refers the ExA to its responses to comments made by the Norfolk Parishes Movement for an Offshore Transmission Network at ID15</p>
18	Please find below a statement that I submitted in June 2022 to National Grid in response to their non-statutory consultation on the East Anglia Green proposal. While the specific focus of the document is on the necessity for the rapid design and implementation of an offshore transmission network for offshore wind, there are nonetheless many points of overlap between the argument contained in this statement and the issues raised by the SEP/DEP Application.	
19	In addition, it provides a context, and a narrative of the crucial role played by National Grid plc in the current scenario regarding offshore wind off the coast of East Anglia, stretching back as far as 2008.	
20	I hope that the ExA might find the information in the submission below useful and that they will bear in mind, while reading it, the requirement at 4.9.1 on p. 59 of EN-1 that it is the responsibility of the Applicant to ensure	

ID	Stakeholder Comment	Applicant Response
	that there is sufficient capacity onshore for the onward transmission of the electricity generated.	of The Applicant's Response to Issues raised at the Open Floor Hearing 2 [REP3-114].
21	It will be essential for the ExA to satisfy itself that this requirement has been met by the Applicant for this SEP/DEP proposal.	As also 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 National Electricity Transmission System (NETS). The application is therefore fully in accordance with paragraph 4.9.1 of NPS EN-1.
22	Response to National Grid's non-statutory consultation on the East Anglia Green (EAG) proposal - June 2022.	The Applicant notes that a copy of a response to National Grid's non-statutory consultation on the East Anglia Green proposal has been submitted. The Applicant has no comment to make on the submission given it relates to a different scheme that does not form part of this Examination.

Table 2 The Applicant's Response to Barford and Wramplingham Parish Council's Deadline 3 Submission [REP3-120]

ID	Stakeholder Comment	Applicant Response
1	<p>Madam Chair, on behalf of Barford and Wramplingham Parish Council we wish to draw your attention to our concerns following receipt of emails from a local resident. The resident farms land to the East of Barford (between noise receptor points CCR25 and CCR26C) which will be impacted by the proposed cable route for SEP and DEP. The proposed cabling is destined to go through their land, then through and across our Parish including under two chalk streams, the rivers Tiffey and Yare.</p>	<p>No response required by the Applicant.</p>
2	<p>Their concerns, as well as those of others in our Parish, illustrate the depth of feeling in this rural community about the dismissive attitude of the Applicant (Equinor) and their agents and we find they are supported by statements made by Chris Hays-Smith at the Open Floor Hearing held at Gresham's School in Holt on 29th March 2023.</p>	<p>No response required by the Applicant.</p>
3	<p>We are concerned that ecological surveys for the cable route around our village may not have taken account of local knowledge and are missing important information. The ecological survey report for the area has been repeatedly promised to the landowner but has not been provided.</p>	<p>Ecology surveys have been carried out in areas where access is available including in the parish of Barford and Wramplingham. The Applicant highlights that further ecology surveys will be carried out prior to construction works and this is secured within Requirement 13 (Ecological management plan) of the draft DCO (Revision G) [document reference 3.1]. Details of the pre-construction ecological surveys are set out within Appendix A of the Outline Ecological Management Plan [REP3-068]</p> <p>Pre-application surveys were completed in 2020-21. The scope comprised an extended habitat survey to map the habitats and appraise their suitability for protected species. Where suitable habitats were present, targeted surveys for protected species were then completed; for example, where watercourses were appraised as providing suitable habitat for white-clawed crayfish, surveys for the species were subsequently completed. This approach and the individual survey methodologies were agreed in consultation with key stakeholders such as Natural England, the RSPB and others. Full detail is provided in the relevant technical appendices to ES Chapter 20 Onshore Ecology and Ornithology (Revision B) [REP3-026].</p> <p>The Applicant would welcome any information which the Barford and Wramplingham Parish Council holds relating to the occurrences and</p>

ID	Stakeholder Comment	Applicant Response
		<p>distributions of protected and notable species in the area. Such information will help inform the scope of the forthcoming pre-construction surveys.</p> <p>The Applicant is not aware of land under the ownership of Barford and Wrampingham Parish Council which overlaps with the DCO Boundary and where ecological surveys were completed. There are individual landowners in the parish who have requested reports privately; some of these reports have been issued and others are forthcoming.</p>
4	<p>In part of the route, the cabling is possibly going to disturb historic farm dumps which may lead to pollution issues. Geophysical surveys have been done, but apparently the reports have not been provided. We understand from the landowner that Equinor have given written assurance they accept liability. However, money will not address decimated fish stocks and downstream native crayfish. Furthermore, the presentation by Chris Hayes-Smith suggests that the likely selling on of the cabling infrastructure may make any claims difficult to administer. Who will own the liability?</p>	<p>The Applicant refers the respondent to The Applicant's Response to Issues raised at the Open Floor Hearing 2 [REP3-114] ID 16.</p> <p>The Applicant refers to Requirement 32 (Contaminated land groundwater scheme) and to the draft DCO (Revision G) [document reference 3.1], which commits the Applicant to carrying out remedial work in respect of any ground contamination or adverse ground conditions. This Requirement is being updated at Deadline 4, to commit to providing a management plan which will set out measures in the event that contamination not previously identified is found to be present on site.</p> <p>Geophysical surveys throughout the Order Limits, including within the Barford and Wrampingham Parish, will likely continue post-harvest when the ground conditions allow for survey techniques which would otherwise be hindered by the presence of crops. Further investigations would be undertaken based in part on the finding of the geophysical surveys (alongside further review of historic mapping, as well as other future ground-intrusive survey results), this would likely be no sooner than 2025.</p>
5	<p>We are very concerned at the potential disturbances that villagers will face as our small country roads are beset by construction traffic, affecting access (by other local villages such as Colton and Marlingford) to our Primary School, and by children in our village to schools elsewhere.</p>	<p>The Applicant has made a commitment to no HGV traffic travelling through Barford. This commitment is contained within the outline Construction Traffic Management Plan (OCTMP) (Revision C) [REP3-062] which is secured via Requirement 15 of the draft DCO (Revision G) [document reference 3.1].</p> <p>ES Chapter 24 Traffic and Transport [APP-110] includes an assessment of the impact of SEP and DEP traffic upon driver delay and identifies that with the application of mitigation measures (as required) residual impacts would not be significant. The assessment of driver delay applies to all</p>

ID	Stakeholder Comment	Applicant Response
		<p>vehicle users of the highway network including school traffic. The Applicant has undertaken an extensive programme of stakeholder engagement with Norfolk County Council (NCC) who have a statutory duty under the Traffic Management Act, 2004 to ensure the expeditious movement of traffic on their road network. The Draft Statement of Common Ground with Norfolk County Council (Revision B) [REP2-033] between the Applicant and NCC identifies the parties agree upon the assessment conclusions.</p>
6	<p>We remain, as per our previous submission, extremely concerned about the impact of noise on local residents and businesses and the possibility of pollution arising from HDD.</p>	<p>The Applicant's Comments on Written Representations [REP2-017] included detailed responses to the noise-related concerns of Barford and Wrampingham Parish Council. This Stakeholder Comment includes no further information on the council's concerns; hence, the Applicant refers to the responses provided in The Applicant's Comments on Written Representations [REP2-017].</p>

Table 3 The Applicant's Response to Cawston Parish Council's Deadline 3 Submission [REP3-122]

ID	Stakeholder Comment	Applicant Response
1	A - CONFIRMATION OF VERBAL SUBMISSION TO OPEN FLOOR HEARING HELD ON 29th MARCH 2023	No response required.
2	We do apologise for our limited engagement with the Examination so far. As previously explained, all of our available time and resource is being spent on dealing with Orsted/Vattenfall, issues around their CTMP, and other queries on signage and traffic management, and we have not been able to take more than a cursory look at some of the documents on the SEP/DEP project.	No response required.
3	However, this review has shown that this Applicant is following the path set by Orsted and Vattenfall, with mountains of documents, relevant detail buried, no inclination to make any concessions towards reasonable treatment of residents and a rule bound, 'jobsworth' approach overriding common sense; for example when looking at the suitability of the road network.	With regard to comments on the suitability of the road network, the Applicant would refer to its response to ID13 below.
4	We expected the Orsted situation to have been wrapped up by now, but their revised CTMP has only just been submitted to the local authority and so we cannot get any definitive answers to questions on traffic numbers. There are other issues including road signage and parking; after several meetings these are still not resolved.	No response required.
5	The parking restrictions that have been unveiled are more draconian than we had been led to expect; we have asked for this to be investigated. Parking tickets are already being issued to residents; a cause of some anger here.	No response required.
6	<p>If the Equinor Application should get approved, what is the likely outcome for residents? Based on experiences so far with the other wind farm companies, they will include</p> <ul style="list-style-type: none"> • poor communication, lots of box ticking but broken promises and delays. • difficulty arranging meetings or getting information. • being fobbed off with dubious excuses and unkept promises 	No response required.

ID	Stakeholder Comment	Applicant Response
	<ul style="list-style-type: none"> • finally, answers being offered, and meetings called to discuss them, only for the information not to be ready – a complete waste of our time. 	
7	We think it is worth offering an edited version of our comments at the previous OFH, as little has changed.	No response required.
8	Cawston Parish Council is not opposed to wind farms. We are strong supporters of renewable energy and the drive to net zero. BUT we are totally opposed to badly thought out construction projects that could, and should, have been done better, in a way that weights the interests and welfare of Norfolk residents more fairly – at least on a par with kittiwakes.	The Applicant acknowledges the comment.
9	(We note here that the latest news on Hornsea 3 is that they are now seeking, post consent, to dilute the agreed protection for these birds).	No response required.
10	CPC has been heavily engaged in dealing with these proposals for the last six years. All of this work is done in councillors' spare time, unpaid, often using their personal resources, and we are simply worn out, with nothing left to engage with this latest DCO proposal in detail. Some councillors have decided not to stand for re-election in May.	The Applicant acknowledges the comment.
11	Equinor will tell you that they alone will not route HGV traffic through the centre of Cawston, so there is little impact on the community. This argument ignores the need for residents to travel outside the village, pupils to get to and from school, and businesses to deal with deliveries and get their staff to work. The other developers have at least amended their working hours to recognise this; Equinor refused.	<p><i>Routing through and in the vicinity of the village (including the potential for cumulative impacts)</i></p> <p>The Applicant refers to its previous response contained within Table 3.4.1 (ID.3) of The Applicants Comments to Relevant Representations [REP1-033].</p> <p><i>Other developers amending their working hours</i></p>
12	Equinor may also imply that their eastern route round the village was designed to remove impact. In fact this was the only space left for them; if approved, their cable route would complete the encirclement of the village, so there was no choice. Impact from the actual construction work will be similar whether it is east, west, north or south of the village.	<p>The Applicant refers to its previous response contained within Table 1 (ID1 and 2) of The Applicant's Response to Issues Raised at the Open Floor Hearing [REP1-064].</p> <p><i>Adequacy of the B1145</i></p>
13	As well as the inadequate B1145, Equinor also plan to send traffic on minor unclassified roads in the area. These are often used for recreation by cyclists, walkers and horse riders; we suggest there is a serious road safety issue here.	The Applicant refers to Table 3 of The Applicant's Comments on Responses to the Examining Authority's First Written Questions [REP2-040].

ID	Stakeholder Comment	Applicant Response
		<p><i>Other minor roads</i></p> <p>ES Chapter 24 Traffic and Transport [APP-110] includes an assessment of the impact of SEP and DEP traffic upon all affected roads and concludes that with the application of mitigation (as required) there would be no significant residual impacts.</p>
14	<p>We ask you to consider the cumulative impacts in Cawston, both when schemes overlap and the impacts of successive schemes over time. These Equinor schemes will add several more years to the impacts of the three previous ones. This is an unacceptable load on a small rural community.</p>	<p>The Applicant refers to its previous response contained within Table 3.4.1 (ID.2) of The Applicants Comments to Relevant Representations [REP1-033].</p>
15	<p>We do want to re-emphasise our request that the Examination takes a wide view, including the role of National Grid and its associated companies, the consideration given to alternative routes and methods of delivery, and cumulative impacts on communities over time - including both physical health and wellbeing issues.</p>	<p>The Applicant refers to its previous responses contained within Table 3.4.1 (ID.2 to ID.5) of The Applicants Comments to Relevant Representations [REP1-033].</p> <p>In addition, the Applicant refers to its previous responses contained within Table 1 of The Applicant's Response to Issues Raised at the Open Floor Hearing [REP1-064] including ID.11 which has been repeated below for ease of reference:</p> <p><i>'The Applicant refers to ES Chapter 28 Health [APP-114] which considers the impacts of the construction, operational and decommissioning phases of SEP and DEP on human health. It also assesses in-combination affects potentially generated by SEP and DEP and other projects. It concludes that SEP and DEP do not have a significant impact on the local population.</i></p> <p><i>The Applicant would also like to confirm that a Stakeholder Communications Plan will be prepared which will set out how the Applicant will engage with local communities and businesses affected by SEP and DEP. Details of the Stakeholder Communications Plan are set out within the Outline Code of Construction Practice (Revision B) [document reference 9.17] which is secured by Requirement 19 within the draft DCO (Revision C) [document reference 3.1].</i></p>
16	<p>Thank you</p>	<p>No response required.</p>

Table 4 The Applicant's Response to Corpusty and Saxthorpe Parish Council's Deadline 3 Submission [REP3-123]

ID	Stakeholder Comment	Applicant Response
1	<p>Our comments, submitted at some length to the ExA, explain why the methodology and methods deployed by the Applicant are inappropriate and insufficient to elicit any proper understanding of the human health and wellbeing effects of their project on communities in Norfolk and indeed more widely in the region.</p>	<p>The Applicant consulted on the methodology for the assessment of human health pre-application and agreed its suitability with the Norfolk County Council Public Health Team.</p> <p>As per The Applicant's Response to Issues raised at the Open Floor Hearing 2 [REP3-114], ID 3:</p> <p><i>'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 [REP3-103].</i></p> <p>The Applicant wishes to correct the Appendix reference from B.3 to B.8.</p>
2	<p>The Applicant in their response explain precisely and with some elaborate but irrelevant citations that "the assessment of human health (APP-114) has not been approached from an economic/project planning perspective. It has been approached through the requirements of the UK legislation, policy and guidance as set out in Section 28.4.1 Policy, Legislation and Guidance, ES Chapter 28 of the Health (APP-114." In the light of these we say that:</p> <ol style="list-style-type: none"> The Applicant has not responded to the extensive critique which we submitted. Instead, they have chosen to avoid responding by quoting/ citing precisely and again evidence of the inappropriate method and methodology they have adopted. We ask the ExA to enquire why the Applicant has not engaged with the substance of our evidence. A cynic might consider that the Applicants have not only marked their own homework, but they have also chosen to answer the wrong question, one they have chosen themselves rather those which Corpusty & Saxthorpe Parish council has posed to them through the ExA. 	<ol style="list-style-type: none"> As noted previously, the Applicant consulted on the methodology pre-application and has agreed its suitability with the Norfolk County Council Public Health Team. Further evidence of this has been provided at Deadline 3 which includes the following submissions: <ul style="list-style-type: none"> The Applicant's Response to Issues raised at the Open Floor Hearing 2 [REP3-114]; The Applicant's Responses to the Examining Authority's Second Written Questions [REP3-101]; Appendix B.3 of Appendix B – Supporting Documents to the Applicant's Responses to the Examining Authority's Second Written Questions [REP3-103]; and Appendix B.8 of Appendix B – Supporting Documents to the Applicant's Responses to the Examining Authority's Second Written Questions [REP3-103]. <p>Further detailed response to the previous submission by Corpusty and Saxthorpe Parish Council [REP1-073] was provided in The Applicant's Comments on Post Hearing Submissions [REP2-043].</p>

ID	Stakeholder Comment	Applicant Response
	<p>d. In particular they have not explained and seem to have lost sight of our question as to why they have not used the method advised by the UK Government's Green Book.</p> <p>e. On closer examination the ExA may consider along with us that this is a very serious omission. In so saying, we note the following:</p> <ul style="list-style-type: none"> i. the assertion that the treatment of wellbeing might not be Green Book compliant is significant. It is surely difficult for an application for what is effectively a national-policy driven investment not to tick all the Green Book boxes - in spirit as well as legal requirements? The Applicant has signally failed to recognise the importance of this aspect of compliance. ii. In addition, the Green Book requires appraisal of options not selected, for example an OTN or the options of offshore transmission. Here again we have evidence of serious methodological flaws in the Applicant's approach, and must pose the further question "were the relative community impacts of these and any other options considered and, if so, what did such appraisal(s) suggest?" <p>f. The Applicant says that their methodology and methods were discussed "at a meeting on 6 April 2022 with the Public Health team at Norfolk County Council to agree the methodology and the approach to assessment. Norfolk County Council acknowledges this engagement and states that the methodology for the Health Impact Assessment is appropriate and based on best practice." However, we suggest that the ExA might consider that the Applicants have not produced any evidence of this consultation or minutes of the meeting.</p> <p>g. In the absence of such evidence, we made a personal request to Dr Louise Smith, the Director of Public Health for Norfolk County Council. This was unsuccessful as she was evidently in the process of resigning from her post.</p> <p>h. For this reason, we endeavoured to obtain this information through our County Councillor. Unfortunately, his request for this information was not called at the most recent full meeting of Norfolk County Council and</p>	<p>b. While this question is addressed to the Examining Authority, the Applicant notes that it has consistently engaged with the comments submitted by Corpusty and Saxthorpe Parish Council [REP1-073 and REP3-123]. As noted in response to 2a, further responses are provided in the document cited above.</p> <p>c. The Applicant states that all responses are provided in good faith.</p> <p>d. The Applicant does not see the relevance of the reference to The Green Book. In the Applicant's experience, the Green Book is used in business cases, appraisals and evaluations for publicly funded projects. It is not used as part of an impact assessment for an Environmental Statement. It was not designed for this purpose as it is concerned with the efficient use of public money to support decision making within Government.</p> <p>e. Please see the Applicant's response for 2d.</p> <p>f. The Applicant submitted the minutes of the meeting between the Applicant and Norfolk County Council that was held on 22 April 2022 at Deadline 3. Please see Appendix B8 of Appendix B Supporting Documents to the Applicant's Responses to the Examining Authority's Second Written Questions [REP3-103].</p> <p>g. Please see the Applicant's response for 2f.</p> <p>h. Please see the Applicant's response for 2f.</p> <p>i. Please see the Applicant's response for 2f.</p>

ID	Stakeholder Comment	Applicant Response
	<p>further action on his part has now been prevented by the advent of the local government elections.</p> <p>i. In the light of these delays, we have submitted a Freedom of Information request as follows: "... seeking the minutes of this meeting, including who attended, details of the discussion, any notes which were taken in the course of the meeting and the decisions arrived at." As any information received will be out of time for the current submission, the ExA might consider requesting access to this information so that it can properly explore the degree of detail with which these matters were considered by the "Public Health Team" and the expertise they had to hand to consider these questions.</p>	
3	<p>At ID-33 the Applicant notes that "REP1-073 (para 11) submits a list of questions as requested by Ms Menaka Sahai at the Public Examination in Norwich on 17 January 2023. The Applicant notes that these comments are directed to the ExA for consideration.</p> <p>a. The ExA will detect that this is an evasive response. It deploys a certain faux naivete to suggest that the questions were addressed to the ExA rather than doing what should have been obvious, answer the questions which were addressed to them through the ExA.</p> <p>b. We await the Applicant's detailed answers to these questions so that the ExA may be in a position to take them in to accounts in its deliberations</p>	<p>a. The Applicant states that all responses are provided in good faith.</p> <p>b. The Applicant provided responses to the detailed questions in Appendix B3 of Appendix B Supporting Documents to the Applicant's Responses to the Examining Authority's Second Written Questions [REP3-103] in response to the Examining Authority's request for the Applicant to address these questions.</p>

Table 5 The Applicant's Response to John Barnard's Deadline 3 Submission [REP3-170]

ID	Stakeholder Comment	Applicant Response
1	<p>I write as agent for John Barnard (identification number 20033228) in connection with his land (sheet 34 of 40 Land Plan " Onshore) as affected by the proposed Sheringham Shoal & Dudgeon Offshore Windfarm Extension Projects.</p> <p>The outstanding issue of the proposed construction and temporary works access to his land was discussed at the Compulsory Acquisition Hearing 1 session 3 on 29 March 2023 and I am writing at the Inspector's request to reiterate my stated views on the need for the alternative access to his land as proposed by Mr Barnard to be adopted.</p>	<p>No response required by the Applicant.</p>
2	<p>Firstly, I refer to the Equinor-Deadline 2 submission-14.2 The Applicants comments on Written Representations where comments were made on Mr Barnards previous Written Representations to include the following: -</p> <p>• The Applicant has sought to keep works away from Ketts Oak and surrounding trees- both the Applicants and Mr Barnard's proposed alternative access are a considerable distance from Ketts Oak so this is not an issue. Likewise, we believe neither access will affect the surrounding trees.</p> <p>• The Applicant states that Mr Barnards proposed access would require works to upgrade the access, we believe such works will be necessary whichever access is adopted.</p> <p>• We cannot see that the access proposed by Mr Barnard would require appreciable loss of vegetation as the Applicant suggests as the hedge could be cut back in accordance with normal farming practices.</p>	<p>The Applicant would reiterate The Applicant's Comments on Written Representations [REP2-017] that note that: <i>"The Applicant has sought to keep works away from Ketts Oak and surrounding trees"</i>. The Applicants proposed access ACC60 (shown on the Access to Works Plans (Revision E) [document reference 2.9]) is further from Ketts Oak than Mr Barnard's proposed alternative access.</p> <p>The Applicant would clarify that the use of Mr Barnard's proposed alternative access would require this field access to be upgraded to provide space for two HGVs to pass. These works would result in the loss of the vegetation either side of the existing farm access. In contrast, the Applicants proposed access (ACC60) would not require the removal of vegetation and if further from Ketts Oak.</p>
3	<p>From the discussions at the Enquiry, we understand that the Applicant's view is that their preferred location was chosen as it is where the cycle path and the road merge adjacent to the David James car sales forecourt to the east and that adopting this access would avoid blocking the road and the cycleway.</p>	<p>No response required by the Applicant.</p>
4	<p>It should be noted in summary as follows: -</p>	<p>i: Please refer to the Applicant's response to above to ID2.</p>

ID	Stakeholder Comment	Applicant Response
	<p>ĩ,§ [i] Both the access proposed by Mr Barnard and that proposed by the Applicant are well away from Ketts Oak and any surrounding trees.</p> <p>ĩ,§ [ii] Mr Barnards access is well away from the car sales garage or any residential development while the Applicants adjoins this development.</p> <p>ĩ,§ [iii] Mr Barnards proposal provides a gap of over 10 metres between the edge of the road/carriageway and the cycleway in which all, but the longest vehicles could stand and wait before crossing the cycleway when no cyclists are present. There is excellent visibility along the cycleway in both directions.</p> <p>ĩ,§ [iv] The Applicants proposal would involve crossing the cycleway as soon as one turns off the road with a blind corner/poor visibility along the cycle path to the west which would mean that any fast-moving cyclist would be in danger from vehicles crossing the cycle path.</p> <p>ĩ,§ [v] Mr Barnards proposed access provides a considerably shorter route on his land to the Working Corridor than the Applicants, it must be the duty of the Applicant to minimise the effect of the Project on the Landowners property which Mr Barnards access does.</p> <p>ĩ,§ [vi] Mr Barnard would be pleased to meet with The Planning Inspectors, Equinor and their agents on site to look at the 2 alternative accesses if this can be arranged.</p>	<p>ii to iv: The Applicant disagrees with this assessment and notes that a 10m separation between the edge of the road and the cycleway would not provide sufficient space for a HGV to fully clear the B1172 should the driver need to give way to a cyclist on the cycleway. As such, the rear of the HGV would overhang into the live carriageway. Furthermore, at the location of Mr Barnards proposed alternative access, the cycleway is set back from the edge of the road behind trees and hedges obstructing intervisibility between cyclists on the cycleway and drivers turning from the B1172. To facilitate safe turning movements in this location would potentially require the removal of further vegetation.</p> <p>In contrast, at the location of the Applicants proposed access (ACC60), the cycleway is provided alongside the road where intervisibility between cyclists and turning traffic is greater. Furthermore, the Applicants proposed access (ACC60) is at a location where the speed limit is lower (resulting in lower vehicle speeds) and being closer to the built-up area, in a location where turning movements (and potential conflicts) would be more commonly expected by cyclists and motorists alike.</p> <p>v: Noting the response to points i to iv above, the Applicant considers that the short additional length of haul road is on balance better than use of proposed alternative field access.</p> <p>vi: The Applicant met with Mr Barnard and his representative during the pre-application stage of the project and is happy to meet again to clarify any additional matters arising.</p>

Table 6 The Applicant's Response to Mr Clive Hay-Smith, Mr Paul Middleton and Priory Holdings Limited's Deadline 3 Submission [REP3-171]

ID	Stakeholder Comment	Applicant Response
1	Summary of Oral Representations, Compulsory Acquisition Hearing 1, 29 March 2023 Joint representations for Clive Hay-Smith (20033312) Paul Middleton (20032995) and Priory Holdings Limited (20033311)	No response required by the Applicant.
2	The Secretary of State will have regard to whether the Applicant has met the following tests for compulsory acquisition.	No response required by the Applicant.
3	I. Applicant must have a clear idea of how they intend to use the land which it is proposed to acquire	<p>Schedule 7 of the draft DCO (Revision G) [document reference 3.1] describes the plots which will be subject to the acquisition of rights in Column 1 by referring to the plot numbers as shown on land plans. The plot numbers are listed in the Book of Reference (Revision E) [document reference 4.1, Section 4]. Table 1-1 describes the new rights being sought by the Applicant. Table 1-2 describes which rights are sought in relation to the relevant plots.</p> <p>The Statement of Reasons (Revision D) [document reference 4.3] describes how the Applicant intends to use the land, with Table 11-1 of the document setting out the different Work Nos and their corresponding compulsory acquisition status. Further details of how the land will be used are also included throughout the Statement of Reasons (Revision D) [document reference 4.3].</p>
4	The Applicant is seeking flexibility to construct two developments either independently, concurrently or sequentially. The temporary possession period associated with sequential construction would have a major adverse effect on affected farmland. This flexibility to construct one or other of separate developments under range of development options and scenarios (with associated uncertainty for Affected Parties), shows the Applicant does not have a clear idea how they intend to use the land.	No response required by the Applicant.
5	Mr Hay-Smith confirmed he had been in engagement with Equinor since 2020, however that negotiations had stalled in part due to serious illness in 2022.	No response required by the Applicant.
6	II. Reasonable efforts to acquire land or rights by agreement	No response required by the Applicant.

ID	Stakeholder Comment	Applicant Response
7	<p>The Applicant's offer for a private agreement is not reasonable, being conditional on agreement to unnecessary and onerous landowner restrictions as follows:</p> <p>a) Affecting an area extending well beyond the DCO Order Limits (estimated at 20 acres at the Hearing; this was a significant underestimate, corrected as follows):</p> <ul style="list-style-type: none"> - Clive Hay-Smith – 55.5 acres of which are outside DCO Order Limits - Paul Middleton – 14.5 acres outside DCO Order Limits <p>NB: An update on this matter reflecting progress in discussions between the parties has been submitted as a Joint Response to the ExA's Second Written Questions (Q2.13.3.1).</p> <p>b) For rights over and above the minimum sought in the DCO, including a restriction on routine farming operations requiring the Applicant's consent to (for example); excavations, planting trees / hedges, any work that would constitute 'development'</p>	<p>The Applicant refers to the joint position statement set out in the response to Q2.8.2.3 in The Applicant's Responses to the Examining Authority's Second Written Questions [document reference 12.5] confirming this point has now been agreed by Mr Hay-Smith and Mr Middleton.</p>
8	<p>The terms of the Applicant's offers are relevant to the Examination and the powers of compulsory acquisition that the Applicant seeks, as they speak directly to whether 'reasonable' efforts to acquire land or rights by agreement have been made. The terms sought by agreement are not reasonable or proportionate, being unnecessary (going well beyond the rights sought in the DCO application itself both in scope and area) and would affect the Affected Parties use and enjoyment of the land.</p>	<p>The Applicant refers to the response to Q2.8.2.3 in The Applicant's Responses to the Examining Authority's Second Written Questions [document reference 12.5] and continues discussions in respect of other terms of a voluntary agreement.</p>
9	<p>The recent decision to refuse The London Borough of Barking and Dagenham Council (Vicarage Field and surrounding land) Compulsory Purchase Order 2021 (Case Ref: APP/PCU/CPOP/Z5060/3278231) is relevant. The Inspector considered at length whether offers and negotiations had been reasonable, then making reference in her decision to refuse the order:</p>	<p>No response required by the Applicant.</p>

ID	Stakeholder Comment	Applicant Response
10	It is the Affected Parties' position that if the Applicant does not make reasonable efforts to acquire land or rights by agreement (i.e. outside of the examination process and the powers sought in the DCO) then this is directly relevant to whether the powers of compulsory acquisition that the Applicant seeks should be granted in the DCO.	The Applicant's attempts to acquire the necessary rights voluntarily are set out in the Statement of Reasons (Revision D) [document reference 4.3]. Paragraph 119 outlines the number of Heads of Terms agreed with Affected Interests to date. The Applicant also refers to the Compulsory Acquisition Schedule (Revision B) [REP3-075] and continues to make reasonable efforts to acquire land and rights by agreement.
11	The Affected Parties are committed to seek agreement with the Applicant on reasonable terms.	The Applicant met with the Respondent's appointed agent on 10th May 2023 to progress discussions in respect of outstanding matters related to the voluntary agreement and will continue to engage with a view to hopefully reaching agreement as soon as possible.

Table 7 The Applicant's Response to Norfolk Parishes Movement for an OTN's Open Floor Hearing Deadline 3 Submission [REP3-150 and REP3-152]

ID	Stakeholder Comment	Applicant Response
1. The Attlebridge Compound [REP3-150]		
1	<p>With regard to the Attlebridge construction compound, the Applicant has put forward its proposals in the event that SEP and DEP are constructed sequentially. Sequential construction could mean a delay of several years between completion of the first project and the need to re-use the Attlebridge compound, following the start of the second project. Also, there could be an even longer gap between uses of the site should the Applicant decide to sell off its consent for the second project to another company or consortium. There is the further possibility that the second project never gets constructed at all, should the consortium decide not to proceed for whatever reason.</p> <p>Faced with these possibilities, it seems unreasonable that the unrestored Attlebridge compound is left as a blot on the landscape for an uncertain period which may extend over such a long period. If the Applicant insists on building these projects sequentially, we consider that they should be required to restore the Attlebridge compound, with appropriate landscaping and planting, etc., immediately after the completion of construction of the first project and this should be included in the draft DCO.</p>	<p>The Applicant acknowledges the concerns raised by the Norfolk Parishes Movement for an OTN in relation to the Attlebridge Main Compound. The need for different project development scenarios is explained within Scenarios Statement [APP-314] and the Supplementary Information to the Scenarios Statement [REP3-074]. Paragraphs 3 and 4 of the Supplementary Information to the Scenarios Statement [REP3-074] notes the Applicants preference to develop Sheringham Extension Project (SEP) and Dudgeon Extension Project (DEP) concurrently and lists the steps undertaken by the Applicant to enable that opportunity.</p> <p>Paragraph 52 of the Scenarios Statement [APP-314], states that the current regulatory regime does not guarantee the ability to secure funding for both projects at the same time, or provide the commercial framework to enable Anticipatory Investment. It is therefore necessary to retain flexibility in how the two projects might be delivered to ensure that each project can be developed under the DCO consent.</p> <p>With respect to the compound at Attlebridge, the Applicant refers the Norfolk Parishes Movement for an Offshore Transmission Network (as the Applicant did in its response to ID (13) in 16.13 The Applicant's Response to Issues raised at the Open Floor Hearing 2 [REP3-114]) 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 considerations would be affected would vary and should be considered on that basis. Of note, and as set out within ES Chapter 4 Project Description [REP3-024], 'for the sequential scenario, as a worst-case, it is assumed that the construction of compounds for the first Project would be completely removed and then reinstated at the start of the second Project'.</p> <p>It remains the Applicant's position that measures will be taken at the appropriate point in the post-consent design process to mitigate potential</p>

ID	Stakeholder Comment	Applicant Response
		<p>and relevant effects. Details of landscape impacts and mitigation will be considered further within the Outline Landscape Management Plan (Revision C) [REP3-066] which is secured under Requirement 11 of the draft DCO (Revision G) [document reference 3.1] and must be discharged prior to construction. As stated in the Applicant's response to Q1.17.3.2 in The Applicant's Responses to the Examining Authority's First Written Questions [REP1-036] [inter alia]:</p> <p><i>"...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.</i></p> <p><i>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.</i></p> <p><i>In line with good practice, topsoil (and depending on ground conditions, a depth of subsoil) will be stripped from the entire compound and stored in temporary bunds to agreed heights around the compound to provide a degree of visual and noise screening. Post consent design will determine if any other noise mitigation is required, based on the actual plant and processes to be involved, which would likely provide a degree of visual mitigation in addition. [...]</i></p> <p><i>The precise detail would be determined at the post construction stage.</i></p> <p><i>The Applicant's position is that measures will be taken at the appropriate point in the post-consent design process to mitigate potential and relevant effects."</i></p>

ID	Stakeholder Comment	Applicant Response
2. The Compensation Fund [REP3-150]		
2	<p>We note that the Applicant has yet to commit to any sort of community fund. We believe, however, that the first responsibility of the Applicant is to ensure there is full and fair compensation for the people who will be directly impacted by the construction phases of SEP and DEP. This would include affected landowners, businesses, Parish Councils and residents. We ask the ExA to make this a requirement of any approval that is given for these projects.</p>	<p>The Applicant refers to its response provided to Q1.22.4.1 within The Applicant's Responses to the Examining Authority's First Written Questions [REP1-036], which states that the Applicant is keen to work with the local community to deliver benefits to the area. It refers to the Outline Skills and Employment Plan (Revision B) [REP3-027], which was updated at Deadline 3, which details measures to bring benefits to the local area. Of note, Section 1.1. states that the Applicant is a long-term partner in Norfolk and the East of England and has been an active member of the community for over a decade through its Sheringham Shoal and Dudgeon Offshore Wind Farms that it operates off the Norfolk coast. The Outline Skills and Employment Plan (Revision B) [REP3-027], is secured by Requirement 26 of the draft DCO (Revision G) [document reference 3.1].</p> <p>With respect specifically to a Community Benefit Fund, any fund which is taken forward will sit outside of the DCO process and will be developed in consultation with Norfolk County Council and other key stakeholders. Norfolk County Council acknowledge this approach and attention is drawn to The Transcript of Issue Specific Hearing 4 [EV-062] (see 00:54:24;27-00:54:38:14).</p> <p>Further information is set out within ID6.iv and ID6.v of The Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 4 [REP3-110].</p> <p>It is worth noting that the Community Benefit Fund would not cover landowners or occupiers of land. The Applicant refers to ES Chapter 19 Land Use, Agriculture and Recreation (Revision B) [REP2-022] Section 19.7.1.2.5 which details mitigation measures and compensation in line with the Compensation Code as well as Article 26 of the draft DCO (Revision G) [document reference 3.1] which confirms compensation is payable to the owners and occupiers of land with reference to the Land Compensation Act 1961 which confirms the basis of compensation.</p>

ID	Stakeholder Comment	Applicant Response
3	A community fund of the sort anticipated by Norfolk County Council should be a secondary consideration. Control of a community fund by Norfolk County Council to address its own internal objectives would not be something that we can support.	Post consent, the Applicant commits to exploring a fair and proportionate overall Community Benefit Fund package. No decisions have been made as to how this will operate, though learning will be taken from the establishment and running of the Sheringham Shoal and Dudgeon Community Benefit Funds. In this context, the comments raised by Norfolk County Council at Issue Specific Hearing 4 on the need for collaboration with other offshore wind farms within Norfolk are noted and the Applicant is engaged in active discussions with Norfolk County Council and other parties to discuss potential support to a more strategic approach to community benefit in Norfolk (transcript of Issue Specific Hearing 4 [EV-062], 00:55:13:29-00:55:44:01).
3. Cumulative Impacts [REP3-150]		
4	My final point is the impact of SEP and DEP and, in particular, the cumulative impacts in combination with the other NSIPs being initiated in Norfolk. This seems to us to have been given scant regards by the Applicant. I emphasise that these projects could, if consented, be the sixth or seventh time that certain communities will face a cable path being dug up in their immediate locality. The construction phase of all these projects could last well over a decade and there is no guarantee that further cable paths for new offshore windfarms or interconnectors will not be proposed in future.	As set out in ES Chapter 5 EIA Methodology [APP-091], the Environmental Statement considers the potential for impacts on a receptor which may occur on a cumulative basis between SEP and DEP and other projects, activities, and plans. The Cumulative Impact Assessment (CIA) has been undertaken as part of each topic impact assessment, with specific methodology and outcomes presented within each technical chapter. The scope of the CIA (in terms of relevant issues and projects) was established with consultees (including other developers) as the Environmental Impact Assessment progressed. The Applicant notes the comments about potential future developments in the area and it is not appropriate for the Applicant to speculate about what may come forward. However, the Applicant notes that any project which does come forward would need to carry out assessments in accordance with the relevant regulations and would be determined on the basis of any cumulative impact assessment conclusions.
5	I believe there are others in the hall tonight who will speak about the cumulative impacts of these projects so I will not linger further on them. I just want to highlight, however, that the electricity generated by SEP and DEP is not needed in Norfolk and will have nowhere to go once Orsted Hornsea Three and Vattenfall Norfolk Vanguard and Boreas are constructed. The Applicant has failed in its responsibility to meet its	The Applicant refers to its response to The Applicant's Response to Issues raised at the Open Floor Hearing 2 [REP3-114], Table 1, ID 15 which covers these points raised previously.

ID	Stakeholder Comment	Applicant Response
	<p>obligation under NPS EN-1, 4.9.1: “it is for the applicant to ensure that there will be necessary...capacity...to accommodate the electricity generated”; namely, to ensure there is sufficient onward capacity within the onshore transmission grid. The East Anglia Green Energy Enablement Project proposed by National Grid is a direct consequence of the radially connected offshore windfarms but the Applicant fails to acknowledge this and yet again it is trying to duck out of its responsibilities. It is left for the people of Norfolk to suffer from the disruption while the whole country will suffer higher energy prices because of curtailment and constraint payments. The correct solution, as our campaign has consistently pointed out, is not to persist with these radial connections and to rapidly deploy a fully integrated OTN. We sincerely hope the ExA will take note of our earlier Written Representation on this matter.</p>	
6	<p>We have attended each of the Open Floor Hearings and Issue Specific Hearings. It has felt at times that the representations from the Norfolk Parishes Movement for an OTN have been swamped by the massed ranks of lawyers, department specialists, experts and consultants which the Applicant has brought in to make its case. Today we have a greater representation from the people and communities affected by this DCO application but – it is still, Madam Chair, the tip of the iceberg. I ask you to imagine for a moment that all the seats in this hall are taken up by the leaders of the 96 Norfolk Parish Councils. And that standing around at the back and sides are the hundreds of Parish Councillors. And then again outside, surrounding this entire hall, many rows deep, are the thousands of people in Norfolk who may or may not be represented by the 96 parishes but who all share our concerns. These are the people whose lives will be impacted. These are the people who will suffer if the Traffic Management Plans and the Construction Management Plans are wrong. These are the people who will suffer if all the assertions made by the applicant are incorrect because they have been made based solely on precedent or on poor quality data or on speculation. These are the people who will “pick up the tab”. It is these people, Madam Chair who are relying on your Examination panel to redress the apparent imbalance of these</p>	<p>The Applicant confirms that a robust Environmental Impact Assessment has been carried out in accordance with the relevant regulations, the methodology of which is set out within Environmental Statement Chapter 5 – EIA Methodology [APP-091]. Of note, Section 5.4 confirms that experienced and competent EIA consultants have been appointed to undertake the assessment work. In addition, and as required by the regulations, the Applicant has carried out extensive pre-application with statutory consultees, the community and other stakeholders which has helped inform the EIA and supporting outline management plans. Furthermore, the outline management plans are subject to scrutiny as part of the current Examination and are continually being reviewed and updated based on stakeholder feedback.</p> <p>The Requirements, set out within Schedule 2, Part 1 (Requirements) of the draft DCO (Revision G) (document reference 3.1) are the equivalent of planning conditions which govern how the scheme will be delivered. A number of the Requirements need to be discharged prior to the commencement of works, including the Outline Code of Construction Practice (Revision D) (Requirement 19), Construction Traffic Management Plan (Revision C) (Requirement 15), Outline Ecological Management Plan (Revision C) (Requirement 13) and Outline Landscape Management Plan (Revision C) (Requirement 11). To discharge these</p>

ID	Stakeholder Comment	Applicant Response
	<p>hearings and to weigh up carefully their objections in the planning balance.</p> <p>Thank you</p>	<p>Requirements, the Applicant needs to submit details (the final management plans) to the discharging authority (e.g. the Local Planning Authority or County Council) for approval. In certain cases, the discharging authority is required to consult other parties, e.g. the Environment Agency, prior to making a decision on the submission. The draft Requirements specify that final management plans submitted are based upon the outline management plans.</p> <p>The management plans are therefore not only based upon a robust EIA process but have been subject to scrutiny as part of the Examination. The final management plans will be scrutinised further, prior to discharge of the Requirements.</p>
<p>4. Scenarios [REP3-152]</p>		
<p>7</p>	<p>Throughout this application process, the Applicant has sought to present itself, by bringing forward these projects, as a developer that:</p> <ul style="list-style-type: none"> • is heroically responding to government targets • is going to deliver vital electricity to the UK grid • has no option but to propose a variety of development scenarios, and • is concerned for the environment and communities. 	<p>The Applicant acknowledges the comments at ID 7-10 of this document and refers the ExA to its responses to comments made by the Norfolk Parishes Movement for an Offshore Transmission Network within The Applicant's Response to Issues raised at the Open Floor Hearing 2 [REP3-114]. The responses are duplicated here for ease of reference.</p>
<p>8</p>	<p>Firstly, the Applicant has included in their dDCO a variety of construction scenarios with best case (i.e., both SEP and DEP constructed) 0.786 GW and worst case (i.e., just SEP constructed) 0.338 GW of generating capacity. The projected UK requirement for electricity generating capacity in the UK by 2025 is at least 113 GW according to NPS EN-1. Therefore, in the best case these projects would deliver less than one third of one per cent of the UK energy requirement and in the worst case, with just SEP constructed, that figure falls to one eighth of one percent. These projects can hardly be considered as vital for the UK. On the other hand, the cost to Norfolk, to the environment, businesses and communities will be completely disproportionate, in either case, due to the cumulative impacts with other offshore windfarm developments.</p>	<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 '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'. Paragraph 129 of the Planning Statement (Revision B) [AS-031] quotes paragraph 2.2.20 of EN-1, which states 'it is critical that the UK continues to have secure and reliable supplies of electricity' and (paragraph 3.4.2) that: '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'.</p> <p>As noted in Supplementary Information to the Scenarios Statement [REP3-074] submitted at Deadline 3, the need for each project is supported</p>

ID	Stakeholder Comment	Applicant Response
		<p>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 “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” (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>
9	<p>Secondly, the Applicant has brought forward these projects in the full knowledge that, unless Ofgem could be persuaded otherwise, there would be a need for separate Contracts for Difference with granting at different bidding rounds. They have accepted the risk on this but have failed to persuade Ofgem to change the current arrangements. The Applicant has also used different consortia of investors for each of the two projects. But they did not have to fund the projects this way. They clearly understand the complexity this brings to delivery of the projects, but they have failed to resolve the issue. In addition, the Applicant has failed to get agreement on anticipatory investment and ensure both consortia work together for the construction phases. The result is they now seek approval for seven different construction scenarios to accommodate the flexibility they claim to need. So, the Examining Authority is being asked to decide the planning balance for projects for which the total amount of energy they will bring in, the construction timeframe, the construction plans (concurrent or sequential) and the environmental and community impacts are all uncertain.</p>	<p>As noted in Supplementary Information to the Scenarios Statement [REP3-074] submitted at Deadline 3, the project development scenarios and the DCO application as made must be considered within the wider industry and regulatory landscape and in a commercial context.</p> <p>Equinor and its partners took the strategic decision to seek to coordinate the development of SEP and DEP with the ambition of delivering an integrated transmission system which serves both wind farms (as opposed to a separated grid option which allows each Project to transmit electricity entirely separately).</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 [REP3-110], 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> <p>The Applicant also refers to paragraph 35 of the Scenarios Statement [APP-314], which confirms that a Cooperation Agreement is in place</p>

ID	Stakeholder Comment	Applicant Response
		<p>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>The Applicant seeks to transpose their problems, which arise from their failures, onto others by laying them before the Examining Authority expecting that you will be persuaded to agree the DCO as it stands. If they succeed Madam Chair, it will be the landowners, businesses and residents in Norfolk who will have to pay the price. If the Examining Authority does decide to recommend consent for this DCO, we maintain that it should only permit concurrent construction of SEP and DEP or “scenario 2”, which allows sequential construction, but whichever project starts first installs the ducts for the second project.</p>	<p>As stated in Supplementary Information to the Scenarios Statement [REP3-074] 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 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>
<p>5. Alternative Grid Connection Point (GCP) [REP3-152]</p>		
11	<p>The Applicant repeatedly claims the selection of Norwich Main as the GCP was made by NG ESO and implies that they were merely a passive participant in the CION process with little control over it. In fact, the preferred option of the developer is taken into consideration from the start of the CION process. The applicant is responsible for providing high level appraisals of technical, environmental, planning consent and deliverability issues. In order to select the overall preferred connection option, the parties evaluate these issues for each connection option and the Applicant has considerable influence over the final preferred option. In effect, it is a joint decision. Furthermore, the Applicant does not have to accept the CION offer – it can choose to accept, to decline or to refer the offer to Ofgem for determination.</p>	<p>The Applicant acknowledges the comments at ID 11-17 of this document and refers the ExA to its responses to Q2.2.2.1 within The Applicant's Responses to the Examining Authority's Second Written Questions [REP3-101]. The Applicant has nothing further to add at this stage.</p>
12	<p>The CION offer is not fixed and can be amended at the request of one of the signatories, virtually until the start of construction. The Applicant, in</p>	

ID	Stakeholder Comment	Applicant Response
	response to numerous calls from communities to go back and consider a different GCP, has steadfastly refused to do so.	
13	The Applicant has accepted the CION offer, but it did, and it still does have a choice in this matter. Therefore, it is quite incorrect for the Applicant to claim that section 4.4.2 of NPS EN-1 does not apply.	
14	As you are aware, not only is consideration of alternatives a requirement of the National Policy Statement, but it is also a requirement of the EIA regulations and indeed the Planning inspectorate's own Advice Note 7 requires this.	
15	The Norfolk Parishes Movement continues to investigate and advocate connection of the SEP and DEP projects at the Walpole substation. We have found no insurmountable technical or engineering reason why the Walpole GCP could not be used and crucially it has the distinct advantage of removing most of the cumulative impacts for businesses, landowners and communities.	
16	Consideration of an alternative GCP is particularly applicable in this case because of the cumulative impacts with other NSIPs. We need an open discussion of these matters so that everyone can understand the relative merits of the options for the GCP. Perhaps the Examining Authority could ask the Applicant to enquire of each of the parties to the CION agreement whether they are prepared to share the relevant information from the CION offer?	
17	Thank you.	

Table 8 The Applicant's Response to Oulton Parish Council's Deadline 3 Submission [REP3-126]

ID	Stakeholder Comment	Applicant Response
1. Noise and Vibration:		
1.1 HDD Noise and Vibration assessments for CCR16B & CCR16C		
1	Oulton Parish Council (OPC) welcomed the discussion during ISH 3 on HDD at these two residential locations CCR16B and CCR16C and the subsequent site visit during the ASI 2.	No response required.
2	It is OPC's understanding that the applicant's position on night-time HDD work may relate to the length of drilling involved, and that in some instances a requirement for night-time HDD work cannot be ruled out.	<p>The Applicant refers to its previous response to Q2.20.4.1 of The Applicant's Responses to the Examining Authority's Second Written Questions [REP3-101], which provides the following information on night-time HDD working:</p> <p><i>'Night-time HDD working is only anticipated if the cable is crossing a railway line (as required by Network Rail) and the drill is too long to be completed in one daytime shift, or in an emergency response to collapse of the borehole.'</i></p> <p>In addition, the Applicant refers to its previous response to Q2.20.2.3 of The Applicant's Responses to the Examining Authority's Second Written Questions [REP3-101].</p>
3	1.1.1 OPC asked for clarification of the applicant's terminology for 'Emergency situations' when night-time HDD will be required. It is noted that the ExA have requested this as an action point.	The Applicant refers to its previous response to Q2.20.4.2 c) The Applicant's Responses to the Examining Authority's Second Written Questions [REP3-101] .
4	1.1.2 OPC note that the applicants have stated that for their Noise and Vibration assessment they had measured all sensitive receptors equally.	The intended point of this comment is unclear; hence, no response is provided.
5	OPC questions whether HDD requirements are indeed equal along the cable route: that is to say that there are variations in distance and depth, and therefore there is the potential for different noise and vibration outcomes.	<p>HDD requirements are not equal along the route, drill distance and depth varies between trenchless crossings according to a variety of factors.</p> <p>The Applicant agrees with OPC that noise impacts on sensitive receptors will depend on factors including the drill length, as this influences the duration of the HDD works and therefore the exposure to the associated noise. The duration of the noise exposure is accounted for in the assessments presented of potential construction noise impacts in ES Chapter 23 Noise and Vibration [APP-109] and in the detail provided in</p>

ID	Stakeholder Comment	Applicant Response
		<p>relation to mitigation of HDD noise impacts in response to Q2.20.4.1 of The Applicant's Responses to the Examining Authority's Second Written Questions [REP3-101]. The airborne noise from HDD works with the potential to impact receptors is emitted by the drilling plant located in the entry pit. It is considered that the only way that drill depth could affect noise impacts on nearby receptors is because the deeper the pit, the greater the acoustic screening provided by the pit edge.</p> <p>The Applicant also agrees with OPC that vibration impacts on sensitive receptors will depend on factors including the drill depth and length. Drill length influences the duration of the exposure, as per the noise impact. Drill depth affects vibration levels at receptors because it influences both the type of ground the vibration propagates through and the distance from the drill head to the receptors. Table 23-26 of ES Chapter 23 Noise and Vibration [APP-109] provides distances from HDD works at which the vibration impact thresholds are anticipated. According to this Table, at receptors further than 4.5m from the HDD works, vibration levels will be below to 1.0 mms⁻¹, which, according to Table 23-16 of ES Chapter 23 Noise and Vibration [APP-109], equates to an effect of low magnitude i.e. not significant. No drilling will be undertaken at locations closer than 4.5m to a residential property.</p>
6	<p>In the case of the two residential properties CCR16B & CCR16C, the HDD will require drilling to a minimum depth of 10m, with the potential for up to 20m under the proposed Solar farm site, and for a distance of 600m.</p>	<p>The 600m drill length is based on a worst case scenario and it may be the case that the drill length is shorter. The Applicant is in discussion with the developer, Docking Solar Park, regarding their approved planning design. Based on those discussions the Applicant currently anticipates that, two HDDs at a minimum depth of 10m could be required:</p> <ul style="list-style-type: none"> • Drill No1 = 180m • Drill No2 = 400m <p>During detailed design further reductions in length of drill No2 will be explored.</p>
7	<p>Neither the applicant nor the solar farm developer have given an explanation or technical reason for these depth variations.</p>	<p>A ground investigation campaign involving multiple borehole locations was undertaken to map course granular zones with ground water monitoring at</p>

ID	Stakeholder Comment	Applicant Response
		specific borehole locations over a calendar year to identify the most suitable drill profile.
8	It is understood that HDD works would be over a period of 12 weeks for SEP/DEP concurrently, for a period of 7 weeks for SEP or DEP in isolation, and for 14 weeks for SEP/DEP sequentially.	Trenchless crossing works durations depend on the crossing length. Crossing lengths are provided in Appendix 4.1 – Crossing Schedule (Revision C) [REP3-029]. The approximate relationship between drill length and duration is provided in the response to Q2.20.4.1 of The Applicant's Responses to the Examining Authority's Second Written Questions [REP3-101].
9	OPC are concerned that the uncertainty of which scenario will be bought forward leaves little reassurance that the applicants are committed to their coordinated approach for the whole project, other than sharing a cable route and substation.	The Applicant refers to the Scenarios Statement [APP-314] and the Supplementary Information to the Scenarios Statement [REP3-074] which provides an overview of the project development scenarios within the DCO application. Paragraphs 3 and 4 of the Supplementary Information to the Scenarios Statement [REP3-074] notes the Applicants preference to develop Sheringham Extension Project (SEP) and Dudgeon Extension Project (DEP) concurrently and lists the measures that the Applicant has adopted to develop the opportunity. In terms of coordination of delivery of project, As set out within paragraph 103 of the Scenarios Statement [APP-314], 'A Cooperation Agreement between Scira Extension Limited (SEL) and Dudgeon Extension Limited (DEL) will govern the necessary cooperation between the two projects'. This is supported by the sixth bullet point under paragraph 4 of the Supplementary Information to the Scenarios Statement [REP3-074] which states that 'the Applicant has committed to delivering the two projects in a coordinated way – the Order Limits are not wide enough to allow each project to be constructed entirely independently of the other without any commercial collaboration'.
10	The sequential scenarios proposed would have a detrimental impact on communities already about to face several years of disruption from three other offshore wind projects. This calls into doubt when onshore construction impacts will end, especially where there is the possibility of the cable route being dug up twice.	In the sequential scenario, there could be a gap between the first project commencing and the second project commencing of up to four years. Each project will take approximately two years to construct. The worst-case scenario, as assessed in the Environmental Statement, is that the first project would reinstate the land after construction and before the second project commenced. In accordance with the guidance in BS 5228-1, the assessment of construction noise impacts reported in ES Chapter 23 Noise and Vibration [APP-109] accounts for the duration of the impact, by

ID	Stakeholder Comment	Applicant Response
		<p>applying criteria that impacts are only significant if they last for a period of 10 or more days of working in any 15 consecutive days or for a total number of days exceeding 40 in any 6 consecutive months. With mitigation, the noise impact of the construction works at the receptors in the Oulton parish is assessed to be no greater than minor adverse i.e. not significant. It is acknowledged that there may be two periods of construction works; however, as these will be separated by a period of at least 6 months, their combined impact is considered no greater than the separate impact of each period of works, i.e. not significant.</p>
11	<p>1.1.3 CCR16B: At CCR16B, a residential property, the Noise & Vibration assessment has been assessed as 70db Medium sensitivity which is categorised as follows by the assessment (APP-109):</p> <p>“Noise receptors are categorised as medium sensitivity where noise may cause disturbance and a level of protection is required but a level of tolerance is expected. Such subgroups include, at all times of day, residential accommodation, private gardens, hospital wards, care homes, schools, universities, research facilities, and temporary holiday accommodation. National parks (during the day only).</p> <p>Vibration receptors are categorised as medium sensitivity where the structural integrity of the structure is limited.”</p>	<p>Noted. No response required.</p>
12	<p>It should be noted that this property is currently isolated and on a slightly elevated farm track, and would be considered to be a quiet location, as it is away from the B1149. This property will have the cable route at its western & southern boundaries, as well as HDD works and compound and associated plant. Also located near to the property will be a temporary compound which could be in situ for 12-18 months. This is dependent on the project's scenario options.</p>	<p>It is recognised that this property is in a quiet location. The assessment of construction noise impacts has accounted for the fact that baseline noise levels at receptors may be low by assuming receptors are in “Category A” as per BS 5228-1. This is discussed in the response to Q1.20.1.2 a) and c) in The Applicant's Responses to the Examining Authority's First Written Questions [REP1-036].</p> <p>The closest proposed secondary compound to CCR16B is Works No. 14A/B, shown in Applicant's Change Request Application 11 April 2023 - 2.6 Works Plans (Onshore) (Revision D) Sheet 15 [AS-050], which is</p>

ID	Stakeholder Comment	Applicant Response
		approximately 820m away to the north-west. At this distance, noise impacts on the property from works at this secondary compound will be negligible.
13	Clarification is needed on the difference between a temporary and secondary compound, as there is no timeline or information given for a temporary compound.	The Applicant refers to its response to Q1.6.2.4 within The Applicant's Responses to the Examining Authority's First Written Questions [REP1-036]. It is worth noting that all of the compounds are temporary.
14	For the sequential scenario it would require the temporary compound to be constructed and removed, then constructed again. The particularities of the scenarios are crucial to the impacts over time on residential properties, and the impacts from construction noise and vibration.	In the sequential scenario, there could be a gap between the first project commencing and the second project commencing of up to four years. Each project will take approximately two years to construct. The worst-case scenario, as assessed in the Environmental Statement, is that the first project would reinstate the land after construction and before the second project commenced. As discussed in relation to ID 10, it is acknowledged that there may be two periods of construction works; however, as these will be separated by a period of at least 6 months, their combined impact is considered no greater than the separate impact of each period of works.
15	1.1.4 CCR16C: OPC has highlighted the issue with CCR16C, which is currently impacted by traffic associated with Hornsea Three Main Construction Compound. There is the added impact of traffic from Norfolk Vanguard & Boreas, sharing the same access route past this property, generated by their Central Works Compound, cable route and Mobilisation Area (MA7). We have recently been told by Vattenfall that MA7 could now be in situ for the whole of the Vattenfall construction period.	The Applicant refers to its previous response on this issue contained within Table 1-2 of The Applicant's Comments on Post-Hearing Submissions (ID59 & ID60) [REP2-043].
16	OPC have stated that there has been a Noise and Vibration assessment carried out by Orsted Hornsea Three at CCR16C which resulted in the need for mitigation in the form of a Highway Intervention Scheme (HIS), and mitigation works to the property.	Noted. No response required.
17	OPC have submitted Orsted's noise and vibration assessment for this property with this response at Deadline 3 (see Annex 1).	Noted. No response required.
18	The HIS was needed to accommodate the two-way passing of HGVs as well as mitigation needed for the property to lessen the impact of noise and vibration from cumulative traffic.	Noted. No response required.

ID	Stakeholder Comment	Applicant Response
19	The mitigation to the property was in the form of the smoothing of an existing railway hump outside the property, acoustic fencing installed and triple acoustic glazing throughout the property, as well as continuing monitoring for traffic noise and vibration for the duration of Hornsea Three main construction compound.	Noted. No response required.
20	The HIS also formed part of the DCO for Norfolk Vanguard & Boreas, with Orsted Hornsea Three implementing the HIS scheme and Vattenfall Norfolk Boreas removing the scheme on completion of their project, assuming that Boreas was the last phase of the two projects.	Noted. No response required.
21	OPC are concerned that at this location there is a risk of further impacts to this property from SEP/DEP construction noise and vibration from the cable corridor HDD work, as well as from traffic along the haul road on the section of cable trench immediately to the east of The Street – compounded by impacts from construction of the necessarily complex crossover of Equinor's cables with those of Vattenfall's. OPC is concerned that very little has been mentioned so far about the complexity of this crossover and the impacts of its construction, for instance on Bluestone Lodge.	<p>The proposed access track to the east of The Street is Works No.13A/B, shown on Sheet 16 of the Applicant's Change Request Application 11 April 2023 - 2.6 Works Plans (Onshore) (Revision D) [AS-050]. The closest point of this track is around 350m from CCR16C. For a receptor at this distance, noise impacts from traffic on the access route will be negligible. Construction noise and vibration impacts on CCR16C are assessed in ES Appendix 23.3 – Construction Noise Assessment [APP-266], with further evidence of the potential for mitigation of noise impacts provided in the response to Q2.20.4.1 of The Applicant's Responses to the Examining Authority's Second Written Questions [REP3-101]. It has been concluded that significant construction noise and vibration effects are not anticipated at CCR16C.</p> <p>The Applicant understands Bluestone Lodge is approximately 10 minutes away from the DCO Order limits.</p>
22	OPC requests that all these additional cumulative impacts should be assessed.	The HIS submitted by OPC in Annex 1 has been reviewed. The HIS includes separate assessments of construction traffic noise and vibration on CCR16C. This assessment takes the same approach adopted in the assessment of construction traffic noise impacts, including cumulative traffic noise impacts, reported in the ES Chapter 23 Noise and Vibration [APP-109]. This relies upon calculations of the likely change in road traffic noise levels due to the project construction, and due to the cumulative traffic flows associated with the project construction and any cumulative projects. The HIS takes an additional assessment approach involving identifying road traffic noise levels at CCR16C due to the presence of a

ID	Stakeholder Comment	Applicant Response
		<p>'hump' or ridge (where the road has been built over the railway line) where The Street crosses the dismantled railway immediately adjacent to The Old Railway Gatehouse. Traffic associated with SEP/DEP will not use The Street; hence, this approach is not relevant to the impacts of SEP/DEP.</p>
23	<p>The cumulative impact at this location could be interpreted as traffic noise and vibration from Orsted & Vattenfall's traffic, still audible but lessened by mitigation to within accepted limits, however additional construction/HDD noise from SEP/DEP in combination with traffic noise & vibration, could exceed these levels. There is also another scenario where the occupants of this property might have no respite from noise and vibration, if there is a requirement for night-time HDD.</p>	<p>The assessment approaches to the cumulative impact of construction noise and construction traffic noise were discussed in Issue Specific Hearing 3, as summarised in Written Summary of the Applicants Oral Submissions at Issue Specific Hearing 3 [REP3-109].</p> <p>As discussed in responses to Q2.20.4.2 a) and c) of The Applicant's Responses to the Examining Authority's Second Written Questions [REP3-101], night-time HDD works are only required in an emergency scenario and the impact of noise from emergency night-time HDD works is not significant.</p>
24	<p>The occupants would be experiencing nuisance from all noise sources. It appears from the Noise and Vibration assessment (APP-109) that Equinor are only considering their own construction works in their CIA and not in combination with traffic noise and vibration from other projects as well as SEP/DEP (APP-109 section 23.7.3.2).</p>	<p>Section 23.7.3.2 of ES Chapter 23 Noise and Vibration [APP-109] describes the assessment of potential cumulative construction noise impacts of SEP/DEP, Hornsea Project Three Offshore Wind farm, Norfolk Vanguard and Norfolk Boreas Offshore Wind farms. This assessment takes a precautionary approach in assuming the potential for the construction timelines of the projects to overlap, which may not occur. It identifies any shared receptors between SEP/DEP and the other projects and identifies the cumulative noise impacts if the construction works on multiple projects were to occur simultaneously. Cumulative residual effects are anticipated to be not significant.</p>
25	<p>OPC question whether there is also the possibility that night-time HDD would also generate traffic, as well as noise and vibration.</p>	<p>The Applicant would reiterate that it is not planning for night time working and night time working would only be required in an emergency. Should an emergency occur, the crew working on the HDD would continue working until the issue is resolved. If the duration of the working day becomes extended however then there may a requirement to switch crews (for safety) which would result in a small number of offsite employee vehicle movements. In the event of an emergency, generally no additional HGV movements via the highway network would be forecast and crews would utilise materials/plant already onsite and limit deliveries/exports to daytime</p>

ID	Stakeholder Comment	Applicant Response
		periods. A small number of HGV movements within the works area may be required at night.
26	1.1.5 HDD under the River Bure and impacts on residential properties CCR15/CCR15B/CCR15C	Noted. No response required.
27	OPC note that early in the examination process the ExA carried out a USI at the other end of Oulton near to the HDD crossing at the river Bure. At this location there is a group of residential properties which will also be impacted by major HDD works as it requires drilling under a river	The assessment of noise impacts from HDD works on CCRs 15, 15B and 15C is provided in ES Appendix 23.3 - Construction Noise Assessment [APP-266], concluding that, without mitigation, effects during the daytime and evenings and weekends would be negligible or low i.e. not significant. The responses to Q2.20.4.1 provided in The Applicant's Responses to the Examining Authority's Second Written Questions [REP3-101] demonstrates the effectiveness of the mitigation measures to be specified in the Construction Noise and Vibration Management Plan (to be included in a final Code of Construction Practice, which will be based on the Outline Code of Construction Practice (Revision D) [document reference 9.17]) such that residual noise effects from night-time HDD works will be not significant.
28	1.1.5.1 OPC has been contacted by the local resident living closest to the location of the HDD crossing point under the River Bure, who has requested that we submit the following point on their behalf:	Noted. See response below.
29	<p>"Bearing in mind the uncertainty about HDD, I am increasingly worried about my water supply. I rely entirely for my supply on my well as do two other cottages who have the right to take water from the well. The depth of the well is approximately 5.30 metres. The water table stands at 3.1 metres as at 17.4.2023 and has varied between 3.1 and 3.6 metres. A flow meter was put down the well in September 1992 when a borehole was dug for agricultural supplies on Strawberry Lane, Saxthorpe (approximately 0.7 metres away at OS grid number G124303).</p> <p>The nearest mains water supply would be approximately 3/4 miles away towards Oulton.</p> <p>The well supplies the three households and given that the average water consumption per household is 349 litres per day, that amounts to approximately 400,000 litres annually.</p>	<p>The Applicant thanks the stakeholder for their contribution and asks if they could clarify the precise location of the well that they are concerned about.</p> <p>Paragraphs 136 and 163 of ES Chapter 18 Water Resources and Flood Risk [APP-104] notes the potential for impacts on unlicensed groundwater abstractions. However, no significant impacts are identified on the basis of the mitigation to protect surface and groundwater quality set out in Sections 18.6.1.3.7 and 18.6.2.1.5 ES Chapter 18 Water Resources and Flood Risk [APP-104] and secured through Sections 3.9 and 6 of the Outline Code of Construction Practice (Revision D) [document reference 9.17], which is secured through Requirement 19 of the draft DCO (Revision G) [document reference 3.1].</p>

ID	Stakeholder Comment	Applicant Response
	<p>I would expect Equinor to put a flow meter down the well at least 14 days before they start and after they stop work at or near the River Bure crossing point.</p> <p>If there is shown then to be any negative impact, I would like reassurance that this would be rectified very promptly and permanently by the developers, and that this requirement should be secured in the DCO.”</p>	<p>Furthermore, the Applicant would like to confirm that specific measures to mitigate potential effects on private water supplies will be identified post-consent, given that appropriate ground investigation data used to inform the detailed design process was not available at the time of DCO submission. Appropriate measures will be agreed with borehole owners on an individual basis.</p>
30	<p>OPC requests further confirmation of the impact and duration of works proposed and whether this is another location of potential night-time HDD work.</p>	<p>As mentioned in previous responses a worst-case scenario could occur requiring night-time working for the HDDs. The triggers for requiring night-time working would be the same as those indicated for Q2.20.4.2 c) HDD Restrictions and Emergency Works in The Applicant's Responses to the Examining Authority's Second Written Questions [REP3-101] however mitigation measures such as the following could be used to minimise the likelihood that night-time working will be required:</p> <ul style="list-style-type: none"> • Commence works on each bore and each phase of reaming etc at the start of the shift with adequate planning to ensure that each phase of work is completed in a single shift. • Manage the programme to ensure that no bores are started with the potential to not be completed before the end of the working week. • Undertake crossings in flat formation, reducing risk and number of operations required for the installation of each duct. <p>The exact methodology will be set out within a Construction Method Statement which will form part of the Code of Construction Practice, which will be based on the Outline Code of Construction Practice (Revision D) [document reference 9.17]. The Outline Code of Construction Practice (Revision D) [document reference 9.17] is secured under Requirement 19 of the draft DCO (Revision G) [document reference 3.1]. Similarly, the Construction Noise (and Vibration) Management Plan, which also will form part of the Code of Construction Practice will set out appropriate noise mitigation specific to the site.</p>

ID	Stakeholder Comment	Applicant Response
31	<p>1.1.6 Impacts on the river Bure and its headwaters: OPC would like to know what depth of HDD is proposed under the river Bure. The river Bure is one of just over 200 chalk streams in the world and the possibility of any environmental damage to such a rare and important ecosystem is therefore a highly sensitive matter and to be avoided at all costs.</p>	<p>The Applicant refers to its previous response to Q1.13.4.2 in The Applicant's Responses to the Examining Authority's First Written Questions [REP1-036].</p> <p>The Applicant understands that the River Bure is a globally rare chalk stream, and has taken this into account in ES Appendix 18.3 – Geomorphological Baseline Survey Technical Report [APP-212] and the assessment of potential impacts presented in Section 18.6 of ES Chapter 18 Water Resources and Flood Risk [APP-104].</p> <p>In order to minimise the potential for impacts associated with the crossing of the River Bure and other chalk streams, the Applicant has selected a trenchless crossing technique that will avoid direct physical disturbance of the watercourses. This is set out in Table 18-3 of ES Chapter 18 Water Resources and Flood Risk [APP-104].</p> <p>The Applicant recognises that trenchless crossing techniques could potentially have some impact upon groundwater-dependent surface watercourses such as chalk streams, for example by changing groundwater flow patterns or releasing drilling fluids (see Sections 18.6.1.3 and 18.6.1.4 of ES Chapter 18 Water Resources and Flood Risk [APP-104]). The Applicant has therefore committed to undertake a site-specific hydrogeological risk assessment at each trenchless crossing location, as stated in Section 7.1.3 of the Outline Code of Construction Practice (Revision D) [document reference 9.17] which is secured under Requirement 19 of the draft Development Consent Order (Revision G) [document reference 3.1]. The results of the hydrogeological risk assessment will allow the trenchless crossing to be designed to minimise risks to groundwater-bearing strata and groundwater-dependent surface water features associated with them. Furthermore, Section 7.1.4 of the Outline Code of Construction Practice (Revision D) [document reference 9.17] sets out a suite of measures that would be adopted during construction to minimise the risks of bentonite breakout on chalk streams and other surface watercourses. The Applicant therefore considers that the proposed trenchless crossing technique will not result in any significant adverse impacts upon Spring Beck.</p>

ID	Stakeholder Comment	Applicant Response
		<p>The Applicant has undertaken extensive consultation with the Environment Agency during the development of the project, which has supported the commitment to use trenchless techniques to cross chalk streams rather than alternative open trench techniques (cf. the Draft SoCG: Environment Agency (Revision C) [document reference 12.10].</p>
32	<p>The National Trust (NT), in collaboration with the Environment Agency, has been involved for several years now – and is still involved – in a highly significant scheme called ‘Riverlands’, engaged in long-term work to restore the health of the ecosystems of the headwaters of the river Bure.</p>	<p>The Applicant notes that considerable restoration work has been undertaken or is planned in the upper River Bure catchment as part of the Riverlands project.</p> <p>As set out in our response to ID31 above, the use of HDD to cross the River Bure will prevent any adverse impacts on the hydrology, geomorphology or water quality of the river. On this basis, the Applicant considers that the ongoing work to restore natural river processes and habitats in the upper Bure will be unaffected by the Project.</p>
33	<p>In a publication called: “Restoring the River Bure in Norfolk”, the NT stated: Why the River Bure is so special</p> <p>Only 200 chalk-stream rivers world wide</p> <p>There are just over 200 chalk-stream rivers around the world and the River Bure is one of them. The river source starts in Melton Constable and passes through both Blickling and Felbrigg estates. The river flows into the internationally important Norfolk Broads which is Britain’s largest designated wetland and a haven for wildlife.</p> <p>Improving Water Quality</p> <p>Working with our partners, local landowners and tenants we’ll be looking to improve water quality and habitats along the river. This will help ease passage for fish and protect endangered species such as the water vole and eel. The hope is that work may even lead to the introduction of the native white claw crayfish in the future and plants like the nationally rare opposite stonewort will return.</p>	<p>Please see the Applicant’s response to ID31 above.</p>

ID	Stakeholder Comment	Applicant Response
34	Has The National Trust been asked for its opinion on the impacts of the route of Equinor's cable trench on the headwaters of the Bure?	<p>The Applicant consulted with National Trust, as a Section 42 Statutory Consultee, on the PEIR, including Site Selection and Assessment of Alternatives (29/04/21 – 10/06/21). The Applicant confirms that the National Trust made no comment on the routing of the cable corridor at the River Bure (see Consultation Report APP-029 and Applicant's Response in Regard to S42 Comments [APP-033] for full details).</p> <p>In addition, the Applicant confirms it's committed to crossing all main rivers, including the River Bure, via HDD, therefore impacts to this and other main rivers are avoided.</p> <p>The Applicant continues to engage positively with the National Trust, developing a Statement of Common Ground, a draft of which has been submitted into the examination [document reference 14.21].</p>
35	The HDD depth proposed under any of the riverbeds by the applicant is 2m. Does this take into account specific criteria for each river, and their individual sensitivities	<p>As per Q1.13.4.2 response in The Applicant's Responses to the Examining Authority's First Written Questions [REP1-036]:</p> <p><i>'The Applicant confirms that HDD depth under main rivers would be at least 2m below the channel bed. However, it should be noted that the exact depth of the HDD at these rivers would likely be deeper. The drill profiles for the Rivers Wensum, Yare, Tud and Tiffey have been produced at a minimum of 10m below riverbed and this will be confirmed during detailed design'.</i></p>
36	The assessments show HDD to be scheduled as 12 weeks for all HDD work, yet it has become clear that each section of HDD will be at different depths and lengths.	A Schedule of up to 12 weeks has been taken as an average. During detailed design the Applicant will produce a comprehensive Programme of Works.
37	OPC would like to understand therefore whether 12 weeks is day-time work only or a combination of day and night-time work at some locations, to achieve the 12-week time frame?	Please see response to ID 30 above.
2. Traffic and transport:		
2.1 Access to ACC25 Temporary Compound		

ID	Stakeholder Comment	Applicant Response
38	OPC raised the issue of access to the cable route along the B1149 at ACC25/ACC25b	The Applicant refers to the response to Q1.23.1.8 in The Applicant's Comments on Responses to the Examining Authority's First Written Questions [REP2-040].
39	<p>OPC seek clarification on whether this compound is only in place for the HDD works or for storage.</p> <p>How long will it be in place?</p> <p>Is a 'temporary' compound and a 'secondary' compound one and the same thing?</p> <p>For instance, the Applicant says:</p> <p>"No. main construction compounds: 1 Duration: 48 months.</p> <p>No. secondary construction compounds: 6,</p> <p>No. CBS batching compounds: 2 Duration: 12 – 18 month"s</p>	<p>As per ES Chapter 19 – Land Use, Agriculture and Recreation (Revision B) [REP2-022], Table 19-2: Realistic Worst-Case Scenarios:</p> <p>Secondary construction compounds (without CBS batching):</p> <ol style="list-style-type: none"> 1. Number – 6, Area – 2,500m², 2. Duration – 12-18 months (active in operation for ~6 months) <p>The Applicant refers to its response to ID13 above.</p>
40	Access ACC25b gives access to the cable route and HDD works under the solar farm.	Noted. No response required.
41	NCC stated that at ACC25b there would be traffic lights and allowing access from B1149 for a limited period only.	
42	This would offer control of traffic along this section of B1149 and into this access ACC25b.	
2.2. OCTMP (REP1-021) (Revision B) access mitigations for ACC25b		
43	<p>"67. Following the submission of the DCO application, additional controls have been also agreed with NCC for access ACC25b. These measures include:</p> <ul style="list-style-type: none"> • Limiting the duration of use of access ACC25b; • Ensuring the temporary traffic signals at ACC25b do not operate between the hours of 07:30 to 09:00 and 16:30 to 17:30; and • No SEP and/or DEP traffic movements should travel to access ACC25b between 07:30 to 09:00 and 16:30 to 17:30." 	Noted. No response required.

ID	Stakeholder Comment	Applicant Response
44	However, there is no written information provided by the applicant as to whether the traffic lights also include ACC25 into the temporary compound.	The Applicant refers for Annex B of the Outline Constriction traffic Management Plan (Revision C) [REP3-062] which outlines proposals to manage access and egress to ACC25 via traffic signals.
45	OPC seeks further clarification on access ACC25 (Temporary Compound) as to whether the temporary compound will be in situ for 12-18 months?	The Secondary Compound will remain for the duration of the Project but will only be operational whilst task specific activities are ongoing within the designated area.
46	If so, would this go against the definition of a 'limited period' for an access off the B1149, as defined by NCC Highways?	The Applicant refers to the Statement of Common Ground with Norfolk County Council (NCC) (Revision C) [document reference 12.17] which outlines that the access concept designs have been agreed to be appropriate and that detailed access designs can be developed and agreed with NCC prior to the start of construction. These discussions will include agreements upon the duration of use of traffic signals and any interaction between ACC25 and ACC25b.
47	Will both access ACC25 and ACC25b be in use at the same time?	
2.3 LINK 131		
48	LINK 131 is the access from the B1149 onto The Street to the SEP/DEP cable route.	The Applicant refers to its response to ID15 above.
49	The Applicant stated during the ASI 2, that their traffic is not considered as cumulative on The Street "as it will not be going past CCR16C".	
50	OPC acknowledges that SEP/DEP's traffic will not be going past CCR16C, on the public road, however that does not rule out impacts, as the SEP/DEP traffic will be accessing their haul road immediately to the southeast if the property, and the very long run of Horizontal Directional Drilling runs directly adjacent to the southern boundary of the garden.	
51	OPC requests that the applicant makes, as a matter of urgency, a much more thorough assessment of cumulative impacts from noise and vibration from construction and traffic in-combination with other projects, at this location.	
52	Separately, and in addition, to the impacts on CCR16C, OPC requests that the ExA asks the Applicant to conduct an assessment of the cumulative impacts of its traffic on the southern end of Oulton Street, in terms of highway	

ID	Stakeholder Comment	Applicant Response
	function and safety. During the NSIP public examinations for Hornsea Three and Vanguard/Boreas there was much discussion of the capacity for this section of The Street to accommodate (or not) the combined traffic of those projects and, for instance, the necessity of applying a maximum cap for HGVs.	<p>The Applicant refers to its previous response to Oulton Parish Council on this issue provided at ID1 of Table 3.9.1 of The Applicant's Comments to Relevant Representations [REP1-033].</p>
53	No allowance has so far been made for the addition of HGV traffic from a further NSIP project	
54	We are forced to remind the Applicant that this section of The Street is the only southern access for all residents, to their homes in Oulton parish (going beyond the hamlet of Oulton Street) - and that the addition of SEP/DEP's need for access to its haul road at this location would be likely to lead to a highly dysfunctional situation, akin to an effective road closure.	
2.4 LINK 57		
55	OPC also raised LINK 57 Blickling Rd and that there is the possibility of a cumulative impact from Vattenfall's LINK 75, which will also access this road from the B1149. The Applicants have stated that they are able to close the road for 15 mins in every hour if required along this link road. It should be noted that Link 57 is also the main access route to Blickling Hall from the Saxthorpe roundabout and is signposted as such (a brown tourist sign).	<p>With regards to comments on cumulative impacts along link 57, the Applicant refers to its previous response to this question provided in response to ID60, Table 1-2 of The Applicant's Comments on Post-Hearing Submissions [REP2-043].</p> <p>With regards to closing a road for 15 minutes in every hour, the Applicant clarifies the Outline Construction Traffic Management Plan (Revision C) [REP3-062] outlines a 'range' of measures that could be adopted to allow HGVs to pass along routes of restricted width. One of these measures is a "Temporary obstruction' signage to hold traffic (for up to 15 minutes with a subsequent gap of at least one hour) whilst HGVs travel along routes". The OCTMP also notes that the final choice of measures will be agreed with NCC.</p> <p>Notwithstanding, the B1145 (link 57) is not identified as a route where these measures would be required and the Applicant confirms that residents will still be able to access their properties.</p>
56	OPC seeks clarification from the Applicant that there will not be a cumulative impact between Vattenfall and Equinor along this route, and that residents will still be able to access this road to their properties.	

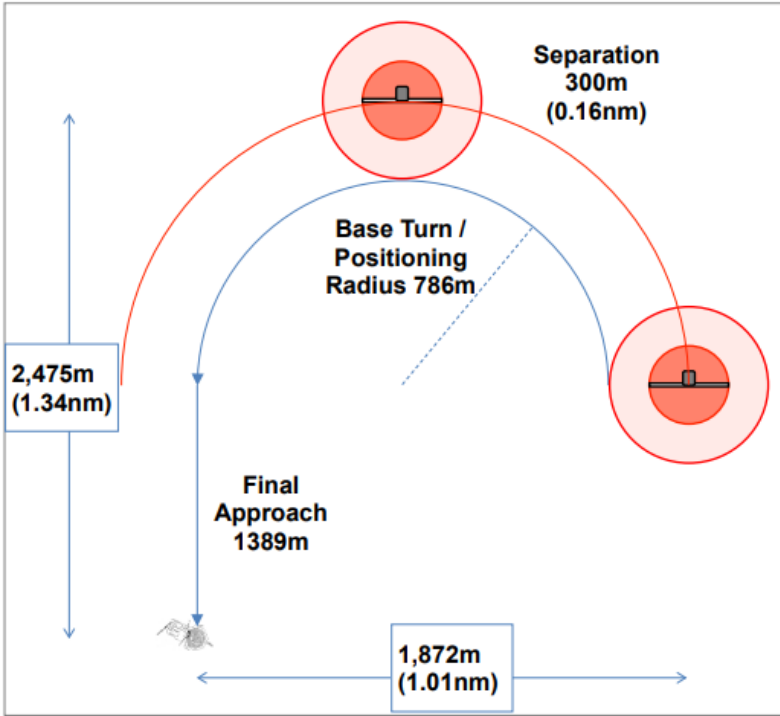
Table 9 The Applicant's Response to Perenco's Deadline 3 Submission [REP3-154 and REP3-156]

ID	Stakeholder Comment	Applicant Response
1.0 Introduction [REP3-156]		
1	At ISH6 Perenco representatives answered specific questions posed by the Examiners relating to the impact of the Applicant's proposal to be able to place turbines within the Site to within a 1nm radius around the Waveney Platform. In order to fully address these questions, it is necessary (i) to clarify the current position with respect to helicopter operations and (ii) to understand the space requirements within which Perenco's helicopter operator is obliged to work. This written summary seeks succinctly to address each of these two areas.	No response required.
2.0 Current Helicopter Operations [REP3-156]		
2	The Waveney platform is a normally unattended installation (NUI). It has a helideck that is currently only certified for flights during daylight hours. From time to time, typically for periods of 1 to 2 months and for around 3 months during decommissioning, a drilling rig will be stationed over the field to undertake work on the Waveney wells. The rigs utilised would have a helideck certified for day and night flights. In practice, Norwich airport is normally operational from 06:00 to 21:30. Taking into account a flying time from Norwich of about 30 minutes, flights can arrive at and depart from the field between 06:30 and 21:00.	The Applicant met with representatives for Perenco on the 26 th April and these opening times are presented in paragraph 26 of the Waveney Helicopter Access Supplementary Analysis [document reference 18.13].
2.1 Waveney Platform [REP3-156]		
3	As the Waveney platform does not have accommodation facilities other than for emergency use, for work to be undertaken at the Waveney platform two flights for normal maintenance operations (i.e. excluding "rotors running" production restart visits) are required within the same day with sufficient time between the flights to enable work to be undertaken. If the forecast indicates that a second flight is unlikely to be possible, the first flight will not be undertaken. Based on operational experience to date, such work only occurs approximately weekly. Both flights need to occur within daylight hours. Flights are possible as long as the minimum conditions for daylight operations under Instrument Flight Rules (IFR) are met.	Agreed.

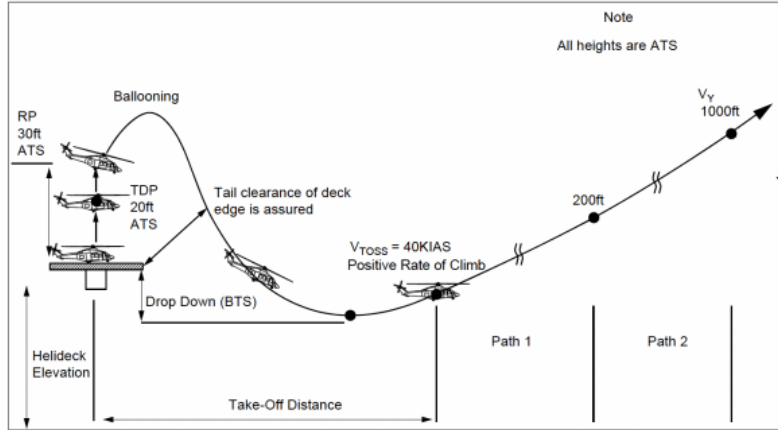
ID	Stakeholder Comment	Applicant Response
2.2 Rig at the Waveney Field [REP3-156]		
4	A rig has accommodation for personnel. Rigs are currently brought alongside the Waveney platform for a significant maintenance campaign and, in the future, will be used to support decommissioning operations. During rig operations, two flights per day are typically required, however these flights are independent of one another so an inability to make one of the flights will not impact the other. Flights are possible whenever the minimum conditions for day or night operations under Instrument Flight Rules are met.	Perenco have access to Vantage POB flight data from similar rig activities which could provide insight to the frequency of flights made during rig operations.
3.0 Space Requirements [REP3-156]		
3.1 Background [REP3-156]		
5	Safe flight operations rely on processes driven by a mixture of regulation, safety recommendations arising from occurrence investigations, and risk assessment; the latter two elements themselves being required by regulation.	No response.
6	Two sets of regulatory frameworks apply to offshore helicopter operations, UK Aviation Law (primarily UK Reg (EU) No. 965/2012 (Air Operations) and UK Reg (EU) No. 923/2012 (UK Standardised Rules of the Air), and The Health and Safety At Work Act 1974, except for those elements amended by the Civil Aviation (Working Time) Regulations (CAWTR). The HSE has delegated enforcement in air operations to the CAA through a memorandum of understanding, last updated in 2017. Therefore, responsibilities in terms of risk exposure, and reduction of risk to "As low as reasonably practicable" whilst not required by aviation regulation, do apply to aviation operations through The Health and Safety At Work Act 1974.	No response.
3.2 Commercial Air Transport to Offshore Installations [REP3-156]		
7	Commercial operators are required to hold an Air Operator's Certificate issued by the CAA in compliance with Part CAT (Commercial Air Transport) and a specific approval for offshore compliant with Part SPA:HOFO (Specific Approval: Helicopter Offshore Operations).	No response.
3.3 Obstacle Avoidance [REP3-156]		

ID	Stakeholder Comment	Applicant Response
8	<p>The Standardised Rules of the Air require aircraft to avoid an obstacle by a minimum of 500 feet (150m) laterally or vertically when operating visually. Where the destination is the offshore installation, the windfarm is treated as an obstruction. for a turbine with a rotor of radius 150m that means avoiding the base of the structure by 300m (1000 ft / 0.17nm) laterally. In instrument conditions or for overflight as CAT we would operate with a defined minimum safe altitude 1000ft above the height of the obstacle rounded up to the nearest 100 feet; in the case of a 330m high turbine, the minimum safe altitude would be 2100 ft.</p>	<p>Agreed.</p>
<p>3.4 Operational Approvals [REP3-156]</p>		
9	<p>The CAA has many expectations defined in the rules, guidance, and internal approval materials before a HOFO approval is granted and when a HOFO operator is audited.</p>	<p>Agreed.</p>
10	<p>First and foremost, as commercial air transport, the safety levels are expected to be the same as any commercial flight operating from any airport, an offshore flight should be as safe as an airline flight out of Heathrow. This has demonstrably not been the case in the past and the CAA has applied restrictions and expectation in terms of: law; guidance material; approvals; and best practice.</p>	<p>No response.</p>
<p>3.5 Airborne Radar Approach [REP3-156]</p>		
11	<p>The airborne radar approach (ARA) rules (Part HOFO.125 GM1 (b)) require an obstacle environment such that each segment of the ARA is located in an overwater area that has a flat surface at sea level. In practice, if there is a windfarm within 7nm on the approach heading or 3 nm beyond, then a radar approach will not be possible – this depends on the wind of the day.</p>	<p>Currently the nearest turbine from the in-situ Dudgeon Offshore Wind Farm is 2.7nm from the Waveney Platform. Although turbines occupy only a small proportion of the arc due south of Waveney.</p>
<p>3.6 Windfarm Working Group Recommendations [REP3-156]</p>		
12	<p>It is reported that the following limitations will be recommended to the CAA by the Windfarm Working Group and adopted into UK regulation:</p>	<p>It is the Applicant's understanding that these will not come into effect during the Examination period. However, as a basis of commonly agreed criteria they have been used in the updated calculations presented in of the</p>

ID	Stakeholder Comment	Applicant Response																
		<p>Waveney Helicopter Access Supplementary Analysis [document 18.13].</p>																
13	<p>For any Installation with a windfarm within 3 nm, flights will be restricted to:</p> <ul style="list-style-type: none"> • day only; • at least 5 km Visibility; • at least 700 ft Cloud Base; and • operator to risk assess and publish specific limitations and routing guidance via the Helideck Certification Agency Technical Committee (Note: Committee is co-chaired with CAA). 	<p>Section 3.1.2 of the Waveney Helicopter Access Supplementary Analysis [document reference 18.13] presents updated calculations based upon the draft criteria agreed with Perenco following work carried out to inform the updated CAA guidance referenced in Q2.21.1.4</p> <p>As presented in Table 3.2 of the Waveney Helicopter Access Supplementary Analysis [document reference 18.13] these criteria reduce access by between 2.4% and 0.7% over the previous VMC criteria used in the Helicopter Access Study [APP-205] and these figure are also reproduced below.</p> <table border="1" data-bbox="1182 708 2074 1027"> <thead> <tr> <th data-bbox="1182 708 1503 772">Condition</th> <th data-bbox="1503 708 1688 772">2020 Dataset 1</th> <th data-bbox="1688 708 1883 772">2021 Dataset 2</th> <th data-bbox="1883 708 2074 772">2022 Dataset 2</th> </tr> </thead> <tbody> <tr> <td data-bbox="1182 772 1503 868">Current Day VMC Cloud base >=600ft AND Visibility >=4000m</td> <td data-bbox="1503 772 1688 868">93.2%</td> <td data-bbox="1688 772 1883 868">94.5%</td> <td data-bbox="1883 772 2074 868">95.4%</td> </tr> <tr> <td data-bbox="1182 868 1503 995">Draft Day VMC Limitations Cloud base >=700ft AND Visibility >=5000m</td> <td data-bbox="1503 868 1688 995">90.8%</td> <td data-bbox="1688 868 1883 995">93.3%</td> <td data-bbox="1883 868 2074 995">94.7%</td> </tr> <tr> <td data-bbox="1182 995 1503 1027">Loss of DAY VMC</td> <td data-bbox="1503 995 1688 1027">2.4%</td> <td data-bbox="1688 995 1883 1027">1.2%</td> <td data-bbox="1883 995 2074 1027">0.7%</td> </tr> </tbody> </table>	Condition	2020 Dataset 1	2021 Dataset 2	2022 Dataset 2	Current Day VMC Cloud base >=600ft AND Visibility >=4000m	93.2%	94.5%	95.4%	Draft Day VMC Limitations Cloud base >=700ft AND Visibility >=5000m	90.8%	93.3%	94.7%	Loss of DAY VMC	2.4%	1.2%	0.7%
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<p>3.7 Turn Rate [REP3-156]</p>																		
14	<p>Part SPA.HOFO.110(b)(5) requires operators to ensure that their crews make optimum use of autopilot, following best practice and helicopter manufacturer guidance. This means that all turns are completed at rate 1, the normal rate of turn for commercial air transport operations equal to a turn through 180 degrees of heading in 60 seconds, or 3o/s. This fixes the minimum radius of turn at our normal final approach speed and initial climb out speed of 80knots, in still air, as 786 metres (0.43 nm). Whilst it is true that the helicopter can be turned more quickly, these offshore operations are commercial air transport, not search and rescue or military operations, and</p>	<p>The Waveney Helicopter Access Supplementary Analysis [document reference 18.13] uses a turn rate of 3° per second as outlined in Section 2.3.1 and agreed with Perenco during a meeting on the 26th of April.</p>																

ID	Stakeholder Comment	Applicant Response
	<p>expecting a tighter radius of turn would preclude compliance with the expectations of Part HOFO.</p>	
<p>3.8 Stabilised Approach [REP3-156]</p>		
<p>15</p>	<p>Part SPA.HOFO.110(b)(6) requires operators to publish specific offshore approach profiles, including stable approach parameters. Current UK practice requires the helicopter to be on a stable final approach by between 0.75nm and 0.5nm from offshore destination, depending on the operator. The Bond Helicopters Operations Manual requires 0.75nm. Any turn to final approach must be complete by stabilised approach minima.</p>  <p>The diagram illustrates a helicopter's approach path to an offshore destination. It features a 'Base Turn / Positioning' arc with a radius of 786m. The 'Final Approach' distance is 1389m. Key separation distances are marked: 2,475m (1.34nm) at the start of the turn, 300m (0.16nm) at the peak of the turn, and 1,872m (1.01nm) at the end of the turn. Two red circles represent the helicopter's position at different stages of the approach.</p>	<p>The Waveney Helicopter Access Supplementary Analysis [document reference 18.13] uses a stabilised approach distance of 0.5nm as this is the current criteria set by the helicopter operator (Bristow) servicing the Waveney Platform and as per HOFO SPA.HOFO.110(b)(6) which requires operators to publish specific offshore approach profiles, including stable approach parameters. Current UK practice requires the helicopter to be on a stable final approach by between 0.75nm and 0.5nm</p>

ID	Stakeholder Comment	Applicant Response
16	This would require 1.34nm along the approach path and up to 1.01nm laterally to achieve a normal approach compliant with the AOC Operations Manual, depending on the arrangement of turbines.	
3.9 Engine Failure Planning [REP3-156]		
17	Under Part CAT.POL.H.300 an operator is legally required to take into account the possibility of an engine failure at any point during the flight and ensure that such an event will not result in an accident. The operator is required to ensure that enhanced engine monitoring programme is in place, that the helicopter is operated within the exposed region for the minimum time, and that simple but effective procedures are followed to minimise the consequence, should an engine failure occur. The most critical points are the committal point on arrival or the take-off decision point (or equivalent) on departure.	Take-off distance with One Engine Inoperable is covered within section 2.3.5 of the Waveney Helicopter Access Supplementary Analysis [document reference 18.13].
18	In the event of an engine failure prior to landing, or just after take-off, the crew will have to react quickly. They must accelerate the helicopter to achieve a speed at which flight can be continued, while using the maximum available power (Maximum Contingency Single Engine Power “the 30 second rating”), so avoiding a forced landing (ditching). The helicopter will initially descend toward the sea and may get as low as 15 feet. This is a very high workload. This phase of the emergency is known as the continued take-off segment and is complete once the take-off safety speed has been achieved. The take-off distance can be calculated from manufacturer supplied data.	
19	The workload continues as the helicopter power must be reduced to the Intermediate Contingency Single Engine Power “2 ½ minute rating” and the helicopter is climbed to 200 ft above the surface, this is known as path 1. The Path 1 distance can be calculated from manufacturer supplied data.	
20	At 200 feet the power is reduced again, the undercarriage is retracted, the helicopter is accelerated to 80 knots and the climb is continued to 1000 feet, this is known as path 2. The Path 2 distance can be calculated from manufacturer supplied data.	

ID	Stakeholder Comment	Applicant Response
	 <p>Note All heights are ATS</p> <p>RP 30ft ATS TDP 20ft ATS Helideck Elevation Ballooning Tail clearance of deck edge is assured Drop Down (BTS) Take-Off Distance Path 1 Path 2 200ft V_Y 1000ft V_{Toss} = 40KIAS Positive Rate of Climb</p> <p>AW139 Rotorcraft Flight Manual: Section 12 Fig 3-E2</p>	
21	<p>At this point the full Emergency Check List actions are commenced, and if required the climb continued to Minimum En-route Altitude, 2100 feet to clear the windfarm for example.</p>	
22	<p>A relatively simple set of calculations can provide an idea of the distances required to achieve this manoeuvre, these figures will vary dependant on the type of the helicopter, mass of the helicopter fuel load, cargo, passengers, the air temperature, the barometric pressure and the height of the helideck.</p>	
23	<p>For example, on a summer's day, +20oC, with low pressure, 993 hPa, with a light 10 knot wind an AW139 operating with a full load, the climb to an MSA of 2100 feet would require 6963m, 3.76 nm. This is the normal procedure. The AWC139 is one of the best performing airframes available to operators and other airframes used in the SNS require longer distances.</p>	
24	<p>For other windfarms, calculations have been made assuming that the published engine failure after take-off procedure is flown to the end of Path 2, then a turn is made away from any obstructions.</p>	

ID	Stakeholder Comment	Applicant Response
25	In this case it is normal to add a 1nm buffer to account for possible climb into instrument conditions. On the same light 10 knot day operating with a full load, the climb to 1000 feet and turn to a safe heading with a 1nm buffer would require 5876m, 3.17 nm.	
26	If the manoeuvre can be executed entirely under visual flight rules (VFR), the 1nm buffer can be replaced by a 150m buffer to provide clearance from the (300m diameter) turbine blades in accordance with the rules of the air, and the required distance would be 4324m, 2.33nm.	
27	It has been suggested by the Applicant that a turn at 500 ft is acceptable. It should be pointed out that it is normal practice to climb to 1000 feet following a single engine failure as in event of a further emergency it can take up to 1000 feet to turn the aircraft if an emergency descent is required. However, on the same light 10 knot day as above, operating with a full load, the climb to 500 feet and turn to a safe heading would require 2631m, 1.42nm.	
28	The Applicant has further suggested that in the event of a failure the crew could follow a turbine lane, flying at 500 feet with one engine. It is not normal practice for commercial offshore helicopters to transit through a wind turbine field to reach a destination beyond it, therefore it is unreasonable to suggest that such a transit should be normal practice on a single engine.	
4.0 Conclusions [REP3-156]		
29	Currently, there are relatively few restrictions to helicopter flights supporting operations at the Waveney field.	The Applicant's conclusion based on updated calculations are presented within the Waveney Helicopter Access Supplementary Analysis [document reference 18.13].
30	It is evident that the proximity of windfarms has an effect on the ability of crews to follow normal procedure and the effect on any flight is highly dependent on the wind direction and actual position of wind turbines within the field.	
31	It is, however, for the Air Operator Certificate (AOC) holder, not the windfarm operator, to assess the risk and the absolute performance numbers, and then take account of the likely real performance of flight crews, who will be: <ul style="list-style-type: none"> • suffering initial startle effect; 	

ID	Stakeholder Comment	Applicant Response
	<ul style="list-style-type: none"> • flying a profile that is only practised twice a year in the simulator; • visually judging the separation from the wind turbines as the radar cannot be used due to its minimum range of 0.7nm; • taking into account wind drift – which can be as much as 900m a minute on a 30 knot day; • dealing with an unusual situation; • completing the emergency checklist; and • liaising with air traffic controllers. 	
32	<p>Taking all of those factors into account, the helicopter operator is required to ensure that there is effective guidance that allows the management, customer and the crews to understand the limitations and procedures for operations to every deck that they might be expected to fly to. Ideally all procedures will be the same. However, it has been established that where there is a windfarm within 7nm there will be an effect on Airborne Radar Approaches. Where there is a windfarm within 3nm safe operations can only be ensured through operational restrictions, with no night flying, increased weather minima and changes to emergency procedures, with associated increased training requirements, and reduced availability for the customer. Where the separation is below 1.42nm, there will be payload restrictions, operational limitations, and in some cases, no flying, as operation within the CAT / HOFO regulation cannot be achieved.</p>	
33	<p>In summary,</p> <ul style="list-style-type: none"> • Wind turbines located within 7nm downwind of Waveney would limit Airborne Radar Approaches; • Wind turbines located within 3nm of Waveney in any direction would, under anticipated new rules agreed by all of the North Sea Helicopter operators and the CAA, restrict flights to daylight and when visibility exceeds 5km and the cloudbase is at least 700’; • Wind turbines located within 2.33nm upwind of Waveney would require a change from standard procedures should an engine fail during take-off; 	<p>As discussed in paragraph 28 of the Waveney Helicopter Access Supplementary Analysis [document reference 18.13] the draft CAA regulations will prohibit night flights within 3nm of a wind farm. The current Dudgeon wind farm is within 3nm of Waveney, with the closest turbine 2.7nm away. If the CAA implements the new regulations in full, then no night CAT operations will be possible to a NPI over Waveney and so DEP will have no material impact on night access.</p>

ID	Stakeholder Comment	Applicant Response
	<ul style="list-style-type: none"> • Wind turbines located within 1.42nm upwind of Waveney would preclude a take-off in the event of one engine being inoperable (OEI); • Wind turbines located within 1.34nm downwind of Waveney or within 1.01nm perpendicular to the approach direction would prevent helicopter access to Waveney. 	
Perenco UK Comment on Applicant's Statements at ISH6 [REP3-156]		
34	<p>At ISH6, Mr Prior, speaking on behalf of the Applicant noted that:</p> <ol style="list-style-type: none"> 1. when overflight of the array is not possible, e.g. due to icing, aircraft could fly in a lane between wind turbine generators; and 2. during a take-off with one engine inoperable (OEI) an aircraft could again make use of a lane between wind turbine generators. 	No response
35	<p>Having regard to IAW CAP764 Para 4.18, Perenco believe that it would be helpful for the Examiners to ask the Civil Aviation Authority Flight Operations Department to provide comment on the following:</p>	
36	<p>1. Whether, under the regulatory and compliance requirements for offshore operations under SERA, Parts HOFO and CAT, it is acceptable, where icing or other phenomena preclude a transit above, for an offshore operator to plan for routine transit through a windfarm using a windfarm lane of width approximately 1200m between turbines of 300m diameter flying at 500' ASL with no option to climb.</p>	
37	<p>2. Whether, under the regulatory and compliance requirements for offshore operations under SERA, Parts HOFO and CAT, it is acceptable, for CAT OEI performance planning to assume that where a turn to a safe heading is not achievable then the OEI climb may be arrested at 500 ASL and OEI transit through the windfarm completed using a windfarm lane of width approximately 1200m between turbines of 300m diameter at 500' ASL with no option to climb until clear of the windfarm.</p>	

Table 10 The Applicant's Response to Robert Glover's Deadline 3 Submission [REP3-177]

ID	Stakeholder Comment	Applicant Response
1	<p>Dear Sir/Madam,</p> <p>May I humbly suggest the route move 20 yards to the east to the other side of the bridge, therefore linking from Farmland to Farmland without having to enter residential land. The corner you propose to drill under of the residential land (Saxthorpe Hall) has a couple of colonies of rare bees and I suspect the drilling will be detrimental to their colony.</p>	<p>See comment below.</p>
2	<p>The shrill carder bumblebee (<i>Bombus sylvarum</i>), so known because of its high pitched buzz, is the UK's rarest bumblebee, now known only from a handful of sites in south Wales and southern England and generally scarce even there. It's a relatively late forager so is generally spotted between June and October.</p> <p>Its distinctive colour (olive-green bands on its thorax with a black band running through between the base of the wings, and a reddish tail) marks it out from any other bumblebees. It forages on a wide variety of plants, and is particularly fond of vetches, red clover, black horehound and red bartsia. It needs extensive flower-rich areas and suitable nesting sites of long tussock-like grass to survive. The loss of these habitats has led to a steep decline in their numbers, and is now restricted to a few locations in southern England.</p> <p>Thank you for your consideration just a small fine adjustment will make a significant difference nature!</p>	<p>The shrill carder bumblebee is very rare and distribution maps show it has not been recorded in Norfolk since 1994, or most of East Anglia since pre-2000 (information taken from the Bumblebee Conservation Trust's and the Bees, Wasps and Ants Recording Society's [BWARS] websites). It is currently known to occur only at sites in south-east England, south-west England and southern Wales. The Applicant's data search with the Norfolk Biodiversity Information Service in 2021 returned no records of the species within 2km of any part of the Order Limits. It is therefore unlikely that this species is present. It is acknowledged, however, that targeted bee surveys were not completed at the landholding, so if the landowner has records of the species (photographs or confirmation from the county recorder) this would be a notable record, particularly if there are multiple, recurrent records which would indicate a population rather than an individual. Invertebrate/bee surveys were not completed at this landholding because the habitat would not be impacted as the cables here would be installed using Horizontal Directional Drilling (HDD), with the drill entry and exit points located in arable fields to the north and south of Saxthorpe Hall (see 6.2.4 Environmental Statement Chapter 4 Project Description, Figures (Revision B) [REP3-028]). The use of HDD to install the cables would not be expected to have a detrimental impact on any bee populations using the habitats above. Bee species such as the shrill carder bee require grasslands which are subject to traditional/sensitive management techniques such as grazing or cutting, so populations survive through (and, for maintaining long-term habitat suitability, depend on) these relatively high-disturbance events. It is therefore not considered realistic that a temporary construction event using trenchless installation techniques beneath the habitat (>2 metres below the surface) would have a discernible impact on this bee species, if</p>

ID	Stakeholder Comment	Applicant Response
		<p>present. The only nearby habitats which would be directly impacted by construction would be arable fields, which do not form a key component of bumblebee populations' habitat.</p>

Table 11 The Applicant's Response to Weybourne Parish Council's Deadline 3 Submission [REP3-128]

ID	Stakeholder Comment	Applicant Response
1	<p>Weybourne PC resolved to join the Norfolk Parishes Movement for an OTN a long time ago because we felt that this gave local residents a voice – helping to redress the power imbalance between, on the one hand, the vested interests of the wind farm companies (in this instance Equinor) with their army of consultants, technical specialists and community liaison teams, and on the other hand ordinary people who are on the receiving end of the cable construction. Being part of the Norfolk Parishes Movement for an OTN has allowed us to pool resources and knowledge and to feel less alone in the fight against the destruction of our rural way of life, and to counter Equinor's propensity to “divide and rule”. It is important for the local community to have a voice, to question the assessments that impacts are “negligible” or “minor”, when this is not actually the experience of the “receptors” (in other words – people!).</p>	<p>The Applicant acknowledges Weybourne Parish Council's comment.</p>
2	<p>We cannot stress enough the cumulative impact of the construction of one wind farm after another. In addition to the human cost of the stress and anxiety caused by the drawn-out planning and construction process, the repeated destruction of important environmental features is disastrous at a time when nature and biodiversity is in crisis. For example, the Hornsea 3 scheme has recently hacked its way through hedgerows and trees along its cable corridor. These are not scheduled to be replaced until the cable construction is completed, which will be several years at least. It will take time for these to recover to function fully as wildlife corridors, and meanwhile, the Equinor projects, if approved, are likely to take out another swathe of hedgerows and trees, further damaging the integrity of these important environmental features.</p>	<p>The Applicant acknowledges the concerns presented by Weybourne Parish Council in respect to impacts to hedgerows, trees and wildlife corridors. It would be inappropriate for the Applicant to comment on other offshore wind farm projects.</p> <p>The followings measures would be in place to reduce and mitigate the impacts of the SEP and DEP projects:</p> <ul style="list-style-type: none"> • Where possible, impacts to hedgerows would be reduced by micro-siting and reducing the crossing width to 20m. Micro-siting would utilise existing gaps in hedgerow vegetation (Outline Code of Construction Practice (Revision D) [REP3-064], Section 2.5.11 Woodland and hedgerow Crossings). • The precise location of the crossing, and any mitigation required, would be informed by pre-construction surveys, which are secured by Requirement 11 (Provision of landscaping) of the draft DCO (Revision G) [document reference 3.1]. • As detailed in the Outline Ecological Management Plan (Revision C) [REP3-068], following the completion of construction in an area, cleared, damaged or disturbed habitats will be reinstated in accordance with the agreed specifications.

ID	Stakeholder Comment	Applicant Response
		<ul style="list-style-type: none"> The Applicant has committed to a positive biodiversity net gain, which would seek to enhance existing hedgerows and habitats (Environmental Statement Appendix 20.6 - Initial Biodiversity Net Gain Assessment [APP-219]). The Applicant has committed to the monitoring / maintenance of enhancement planting along the cable corridor for a 10-year period after the completion of works. These commitments are detailed in the Outline Landscape Management Plan (Revision C) [REP3-066] and Outline Ecological Management Plan (Revision C) [REP3-068] and are secured by Requirement 12 (Maintenance of landscaping) of the draft DCO (Revision G) [document reference 3.1].
3	<p>With the latest research on climate change suggesting that the situation is even more serious than previously thought, now is not the time to be ripping out vegetation which fulfils vital functions: providing shelter from wind, temperature regulation, sequestering carbon, sequestering water, preventing soil erosion, and providing food, shelter and nesting opportunities for wildlife. Particularly when there is a much better alternative to bring ashore the renewal energy from the Equinor wind farm projects, namely a connection at Walpole.</p>	<p>As per The Applicant's Comments on Relevant representations [REP1-033] Table 3.14.1, ID 1, the Connection and Infrastructure Options Note (CION) process is the mechanism used by National Grid to evaluate potential transmission options to identify the connection point in line with their obligations to develop and maintain an efficient, coordinated and economical system of the electricity transmission network. The grid connection point for SEP and DEP was determined by National Grid following the completion of the CION process.</p> <p>For more information regarding the grid connection point see Sections 3.6 and 3.10 of Environmental Statement Chapter 3 Site selection and Assessment if the Alternatives [APP-089] and the Applicants response to Q2.2.2.1 in The Applicant's Responses to the Examining Authority's Second Written Questions [REP3-101].</p> <p>Once construction is complete along the cable route, the land will be reinstated to its previous condition. As stated above in the response to ID 2, commitments to mitigation, reinstatement and monitoring of vegetation are detailed in the Outline Landscape Management Plan (Revision C) [REP3-066] and Outline Ecological Management Plan (Revision C) [REP3-068] and are secured by Requirement 12 (Maintenance of landscaping) of the draft DCO (Revision G) [document reference 3.1].</p>

References

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