



# Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects

Final Statement of Common Ground (SoCG) with  
Natural England (Onshore) (Revision B)

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## Glossary of Acronyms

AONB	Area of Outstanding Natural Beauty
BDC	Broadland District Council
CEA	Cumulative Effect Assessment
CIA	Cumulative Impact Assessment
CMG	Core Management Group
CSIMP	Cable Specification, Installation, and Monitoring Plan
DAS	Design and Access Statement
DCO	Development Consent Order
DEL	Dudgeon Extension Limited
DEP	Dudgeon Offshore Wind Farm Extension Project
DMPD	Development Management Policies Document
EIA	Environmental Impact Assessment
EMP	Ecological Management Plan
EPP	Evidence Plan Process
EPS	European Protected Species
ES	Environmental Statement
ETG	Expert Topic Group
FAQ	Frequently Asked Questions
GCN	Great Crested Newt
GCN DLL	Great Crested Newt District Level Licensing Scheme
HDD	Horizontal Directional Drilling
HVAC	High Voltage Alternating Current
IAPC	Impact Assessment and Payment Certificate
INNS	Invasive Non-Native Species
IP	Interested Parties
IPMP	In-Principle Management Plan
IPC	Infrastructure Planning Commission
km	Kilometre
LCT	Landscape Character Types
LMP	Landscape Management Plan
LoNI	Letter of No Impediment

LPA	Local Planning Authority
LVIA	Landscape and Visual Impact Assessment
MGN	Marine Guidance Note
MW	Megawatts
NBIS	Norfolk Biodiversity Information Service
NCAONB	Norfolk Coast Area of Outstanding Natural Beauty
NE	Natural England
NERC	Natural Environment and Rural Communities
NP	National Park
NSBLPZ	Norwich Southern Bypass Landscape Protection Zone
NSIP	Nationally Significant Infrastructure Project
OEMP	Outline Ecological Management Plan
OLEMS	Outline Landscape and Ecological Management Strategy
OLMP	Outline Landscape Management Plan
OSP	Offshore Substation Platform
OTNR	Offshore Transmission Network Review
OWF	Offshore Wind Farm
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
PRoW	Public Right of Way
RSPB	Royal Society for the Protection of Birds
RVAA	Residential Visual Amenity Assessment
SEL	Scira Extension Limited
SEP	Sheringham Offshore Wind Farm Extension Project
SLIVA	Seascape and Landscape Visual Impact Assessment
SNC	South Norfolk Council
SNCB	Statutory Nature Conservation Body
SoCG	Statement of Common Ground
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
UK	United Kingdom
ZOI	Zone of Influence

## Glossary of Terms

Order Limits	The area subject to the application for development consent, including all permanent and temporary works for SEP and DEP.
Dudgeon Offshore Wind Farm Extension Project (DEP)	The Dudgeon Offshore Wind Farm Extension onshore and offshore sites including all onshore and offshore infrastructure.
DEP offshore site	The Dudgeon Offshore Wind Farm Extension consisting of the DEP wind farm site, interlink cable corridors and offshore export cable corridor (up to mean high water springs).
DEP onshore site	The Dudgeon Offshore Wind Farm Extension onshore area consisting of the DEP onshore substation site, onshore cable corridor, construction compounds, temporary working areas and onshore landfall area.
DEP North array area	The wind farm site area of the DEP offshore site located to the north of the existing Dudgeon Offshore Wind Farm
DEP South array area	The wind farm site area of the DEP offshore site located to the south of the existing Dudgeon Offshore Wind Farm
DEP wind farm site	The offshore area of DEP within which wind turbines, infield cables and offshore substation platform/s will be located and the adjacent Offshore Temporary Works Area. This is also the collective term for the DEP North and South array areas.
Evidence Plan Process (EPP)	A voluntary consultation process with specialist stakeholders to agree the approach, and information to support, the EIA and HRA for certain topics.
Expert Topic Group (ETG)	A forum for targeted engagement with regulators and interested stakeholders through the EPP.
Horizontal directional drilling (HDD) zones	The areas within the onshore cable route which would house HDD entry or exit points.
Infield cables	Cables which link the wind turbine generators to the offshore substation platform(s).
Interlink cables	Cables linking two separate project areas. This can be cables linking:  1) DEP South array area and DEP North array area;

	<p>2) DEP South array area and SEP; or</p> <p>3) DEP North array area and SEP.</p> <p>1 is relevant if DEP is constructed in isolation or first in a phased development.</p> <p>2 and 3 are relevant where both SEP and DEP are built.</p>
Interlink cable corridor	This is the area which will contain the interlink cables between offshore substation platform/s and the adjacent Offshore Temporary Works Area.
Landfall	The point at the coastline at which the offshore export cables are brought onshore, connecting to the onshore cables at the transition joint bay above mean high water.
Offshore cable corridors	This is the area which will contain the offshore export cables or interlink cables, including the adjacent Offshore Temporary Works Area.
Offshore export cable corridor	This is the area which will contain the offshore export cables between offshore substation platform/s and landfall, including the adjacent Offshore Temporary Works Area.
Offshore export cables	The cables which would bring electricity from the offshore substation platform(s) to the landfall. 220 – 230kV.
Offshore substation platform (OSP)	A fixed structure located within the wind farm site/s, containing electrical equipment to aggregate the power from the wind turbine generators and convert it into a more suitable form for export to shore.
Offshore Temporary Works Area	An Offshore Temporary Works Area within the offshore Order Limits in which vessels are permitted to carry out activities during construction, operation and decommissioning encompassing a 200m buffer around the wind farm sites and a 750m buffer around the offshore cable corridors. No permanent infrastructure would be installed within the Offshore Temporary Works Area.
Onshore cable corridor	The area between the landfall and the onshore substation sites, within which the onshore cable circuits will be installed along with other temporary works for construction.

Onshore export cables	The cables which would bring electricity from the landfall to the onshore substation. 220 – 230kV.
Onshore Substation	Compound containing electrical equipment to enable connection to the National Grid.
PEIR boundary	The area subject to survey and preliminary impact assessment to inform the PEIR.
Sheringham Shoal Offshore Wind Farm Extension Project (SEP)	The Sheringham Shoal Offshore Wind Farm Extension onshore and offshore sites including all onshore and offshore infrastructure.
SEP offshore site	Sheringham Shoal Offshore Wind Farm Extension consisting of the SEP wind farm site and offshore export cable corridor (up to mean high water springs).
SEP onshore site	The Sheringham Shoal Wind Farm Extension onshore area consisting of the SEP onshore substation site, onshore cable corridor, construction compounds, temporary working areas and onshore landfall area.
SEP wind farm site	The offshore area of SEP within which wind turbines, infield cables and offshore substation platform/s will be located and the adjacent Offshore Temporary Works Area.
Study area	Area where potential impacts from the project could occur, as defined for each individual Environmental Impact Assessment (EIA) topic.
The Applicant	Equinor New Energy Limited. As the owners of SEP and DEP, Scira Extension Limited and Dudgeon Extension Limited are the named undertakers that have the benefit of the DCO. References in this document to obligations on, or commitments by, 'the Applicant' are given on behalf of SEL and DEL as the undertakers of SEP and DEP.



## 1 Introduction

### 1.1 Background

- 1 This Statement of Common Ground (SoCG) has been prepared by Equinor New Energy Limited (the Applicant) and Natural England. It identifies areas of the Sheringham Shoal Offshore Wind Farm Extension Project (SEP) and Dudgeon Offshore Wind Farm Extension Project (DEP) Development Consent Order (DCO) application (the Application) where matters are agreed or not agreed or that remain under discussion between the parties between the parties. This SoCG covers onshore matters only. A separate SoCG covering offshore matters has been prepared.
- 2 The Applicant has had regard to the Planning Act 2008: Guidance for the examination of applications for development consent (Department for Communities and Local Government, 2015) when compiling this SoCG.
- 3 This SoCG has been structured to reflect topics of the Application which are of interest to Natural England (for onshore matters). The applicable matters considered within this SoCG apply to Natural England's statutory remit.
- 4 Natural England is a statutory nature conservation body (SNCB) established by the Natural Environment and Rural Communities Act 2006 (NERC Act).
- 5 Section 2 of the NERC Act provides that Natural England's general statutory purpose is:
- '... to ensure that the natural environment is conserved, enhanced and managed for the benefit of present and future generations, thereby contributing to sustainable development.'*
- 6 This includes:
- Promoting nature conservation and protecting biodiversity;
  - Conserving and enhancing the landscape;
  - Securing the provision and improvement of facilities for the study, understanding and enjoyment of the natural environment;
  - Promoting access to the countryside and open spaces and encouraging open-air recreation; and
  - Contributing in other ways, to social and economic well-being through management of the natural environment.
- 7 Natural England is required to keep under review all matters relating to its general purpose, and to provide public authorities with advice where they request this (Planning Inspectorate, 2018).
- 8 **Table 1** presents the onshore topics included in the SoCG with the Applicant and Natural England.

*Table 1: Topics Included in the SoCG*

Topic/Chapter	Reference	Part of the Evidence Plan Process (EPP) (Yes/No)
Onshore Ecology and Ornithology (Revision C)	REP3-026	Yes
Landscape and Visual Impact Assessment	APP-112	Yes

9 Further detail of those topics included in the Evidence Plan Process (EPP) can be found in the **Consultation Report Appendix 1 (Evidence Plan)** [APP-030]. Details of the consultation undertaken on those topics not included in the EPP are set out in the corresponding chapters of the Environmental Statement (ES).

10 Onshore topic specific matters agreed, not agreed and matters that remain under discussion between the Applicant and Natural England are included within this SoCG. Matters that are not yet agreed will be the subject of ongoing discussion between the Applicant and Natural England to reach agreement on each matter wherever possible or refine the extent of disagreement between parties. The notes column of the SoCG tables provides commentary on these matters.

11 Throughout the SoCG the phrase “Agreed” identifies any point of agreement between the Applicant and Natural England. The phrase “Not Agreed” identifies any point that is not agreed between the Applicant and Natural England.

## 1.2 The Development

12 SEP and DEP will each have an export capacity greater than 100 megawatts (MW). The SEP and DEP wind farm sites are 15.8 kilometres (km) and 26.5km from the coast for SEP and DEP respectively at their closest point. When operational, SEP and DEP combined would have the potential to generate renewable power for around 785,000 United Kingdom (UK) homes from up to 23 wind turbines at SEP and up to 30 wind turbines at DEP.

13 SEP and DEP will be connected to shore by offshore export cables installed to the landfall at Weybourne, on the north Norfolk coast. From there, the onshore export cables travel approximately 60km inland to a new high voltage alternating current (HVAC) onshore substation near to the existing Norwich Main substation. The onshore substation will be constructed to accommodate the connection of both SEP and DEP to the transmission grid.

14 The key offshore components will comprise:

- Offshore wind turbines and their associated foundations;
- Offshore Substation Platform/s (OSP/s) and their associated foundations;
- Scour protection around foundations;
- Subsea cables comprising:
  - Offshore export cables (linking the OSP/s to the landfall)
  - Interlink cables (linking two separate project areas)

- Infield cables (linking the wind turbine generators to the OSP/s)
  - External cable protection on subsea cables as required
  - Fibre optic communications cables integrated with the power cables; and
  - Temporary working areas.
- 15 The key components at the landfall will comprise:
- Up to two ducts (one per project) installed under the cliff by Horizontal Directional Drill (HDD). An additional drill per project is included (four in total) in the impact assessment worst-case scenarios where applicable, for contingency purposes in the unlikely event of HDD failure; and
  - Up to two transition joint bays to house the connection between the offshore and onshore cables.
- 16 The key onshore components will comprise:
- Ducts installed underground to house the electrical cables along the onshore cable corridor;
  - Onshore cables installed within ducts;
  - Joint bays and links boxes installed along the cable corridor;
  - Trenchless crossing zones at certain locations such as some roads, railways, and sensitive habitats (e.g., rivers of conservation importance);
  - Temporary construction compounds and accesses;
  - An onshore substation and onward 400kV connection to the existing Norwich Main substation; and
  - Permanent operational substation access.

### 1.3 Consultation with Natural England

- 17 The Applicant has engaged with Natural England on the project during the pre-Application process, both in terms of informal non-statutory engagement and formal consultation carried out pursuant to Section 42 of the Planning Act 2008.
- 18 During formal (Section 42) consultation, Natural England provided comments on the Preliminary Environmental Information Report (PEIR) by way of a letter dated 10<sup>th</sup> June 2021.
- 19 Further to the statutory Section 42 consultation, several meetings were held with Natural England through the EPP. These are detailed throughout the SoCG, and minutes of the meetings are provided in **Consultation Report Appendix 1** [APP-030].

### 1.4 Summary of Agreed, Not Agreed and In discussion

- 20 In order to easily identify whether a matter is 'agreed', 'not agreed', or 'in discussion' the position status colour coding system set out in **Table 2** is used in the SoCG.
- 21 Details of specific topics that are 'agreed', 'not agreed' or 'in discussion' between the Applicant and Natural England are presented in **Table 5** and **Table 7**.

Table 2: Position status key

Position Status	Position Colour Coding
<b>Agreed</b> The matter is considered to be agreed between the parties.	Agreed
<b>Not Agreed – no material impact</b> The Matter is not agreed between the parties. However while Natural England does not agree with the approach taken by the Applicant, Natural England does not consider this will result in material impact to the assessment conclusions. The matter is considered to be closed for the purposes of this SoCG.	Not Agreed – no material impact
<b>Not Agreed – material impact</b> The matter is not agreed between the parties. The outcome of the approach taken by the Applicant is considered to result in a materially different impact to the assessment conclusions. Discussions on these matters have concluded.	Not Agreed – material impact
<b>In discussion</b> The matter is neither ‘agreed’ nor ‘not agreed’ and is a matter where further discussion is required between the parties (e.g., where documents are yet to be shared with Natural England).	In discussion

## 2 Statement of Common Ground

22 A summary of the consultation undertaken to date with Natural England and the matters agreed or not agreed between the Applicant and Natural England (based on discussions and information exchanged between the Applicant and Natural England during the pre-application and phase of the Application) are set out below for each of the SoCG topic areas.

### 2.1 Project-wide considerations

23 **Table 3** provides areas of agreement and disagreement for project-wide considerations.

Table 3: Project-wide considerations

ID	The Applicants position	Natural England position	Position Summary
<b>Electricity Supply</b>			
1	There is a need to provide new forms of renewable energy generation and this is emphasised in UK Government policy including the National Policy Statement for Renewable Energy Infrastructure (EN-3) The principle of the development of SEP and DEP is therefore supported, as it accords with national renewable energy policy, targets and objectives.	As far as Natural England is aware, the correct policies have been identified. We note that all policies are soon to be updated.	Agreed
2	The onshore connection point was determined through a	Agreed.	Agreed

ID	The Applicants position	Natural England position	Position Summary
	<p>statutorily mandated process involving both the Applicant and National Grid, to identify a direct connection to the 400kV national transmission system.</p>		
<b>Site Selection</b>			
3	<p>As described in ES <b>Chapter 3 Site Selection and Assessment of Alternatives</b> [APP-116], the methodology adopted for selecting and assessing the landfall location, is considered robust and appropriate.</p> <p>A commitment to trenchless crossing techniques (HDD) at landfall avoids any interactions with Weybourne Cliffs Site of Special Scientific Interest (SSSI).</p>	<p>Natural England agrees the methodology adopted for selecting and assessing the landfall location, is considered robust and appropriate.</p> <p>In addition, Natural England agrees the commitment to HDD at landfall will avoid interactions with Weybourne Cliffs SSSI.</p>	Agreed
4	<p>As set out in ES <b>Appendix 3.1 - Onshore Substation Site Selection Report</b> [APP-175], the methodology adopted for selecting and assessing the onshore substation location options, including the final option, is considered robust and appropriate.</p> <p>Onshore substation selection avoids sensitive habitats and designated nature conservation sites.</p>	<p>Natural England agrees methodology adopted for selecting and assessing the onshore substation location options, including the final option, is considered robust and appropriate.</p>	Agreed
5	<p>As set out in ES <b>Appendix 3.3. - Onshore Main Construction Compound Site Selection Report</b> [APP-177], the methodology adopted for selecting and assessing the main compound location options, including the final option, is considered robust and appropriate.</p>	<p>Natural England agrees the methodology adopted for selecting and assessing the main compound location options, including the final option, is considered robust and appropriate.</p>	Agreed
6	<p>As described in ES <b>Chapter 3 – Site Selection and Assessment of Alternatives</b> [APP-116], the methodology adopted for selecting and assessing the cable corridor, including the final option, is considered robust and appropriate.</p>	<p>Natural England generally concurs and welcomes with the methodology adopted for selecting and assessing the cable corridor, including where possible to avoid designated conservation sites. However, our agreement is subject to the below comments.</p>	Not Agreed – Material Impact

ID	The Applicants position	Natural England position	Position Summary
	<p>The cable corridor site selection avoids, where possible, designated nature conservation sites.</p> <p>A commitment to trenchless crossing techniques (HDD) avoids possible direct impacts to any statutory designated sites that currently fall within the cable corridor DCO order limit.</p> <p>The Applicant is aware that the Wensum Woods is a candidate SSSI and notes that the potential impacts of this potential designation cannot be assessed given the extents of the SSSI has not been defined. However, the Order Limits do not pass through any woodland habitat in the vicinity of the River Wensum and so it is expected that all habitats which would be designated as part of the Wensum Woods SSSI would be avoided. Any impacts to Core Sustenance Zones would be informed by pre-construction surveys, which are secured within the <b>Outline Ecological Management Plan (Revision E)</b> [document reference 9.19], which is already secured by Requirement 13 (Ecological Management Plan) of the <b>draft DCO (Revision K)</b> [document reference 3.1].</p> <p>With regard to the bentonite breakout plan at the River Wensum, the Applicant notes that the <b>Outline Code of Construction Practice (Revision F)</b> [document reference 9.17] contains mitigation measures for sediment management (Section 7.1.1), pollution prevention (Section 7.1.2) and bentonite breakout (7.1.4). All of which are secured by Requirement 19 of the <b>draft</b></p>	<p>With regards to the Wensum area for bats and the potential for future SSSI notification, further to our advice at Deadline 5 [REP5-065]. Natural England advises the Crossing Schedule information presented by the Applicant is yet to provide crossing details for the areas closest to Alderford common (Reepham Road and School Road). This issue remains unchanged.</p> <p>As advised in our R&amp;I log at Deadline 7, until an outline bentonite mitigation plan is agreed, Natural England is unable to conclude with certainty that the likelihood of AEoI to the white-clawed crayfish, brook lamprey and bullhead features of the River Wensum SAC can be avoided. Natural England understands that as Requirement 19 we will be a named consultee of these plans once developed.</p>	

ID	The Applicants position	Natural England position	Position Summary
	<p><b>DCO (Revision K)</b> [document reference 3.1]. Natural England is a named consultee on Requirement 19 and will be consulted with regard to the final Bentonite Breakout Plan at the River Wensum.</p>		
7	<p>The cable corridor site selection avoids Ancient Woodland Sites. Colton Wood and Smeeth Wood are the only Ancient Woodlands in close proximity to the DCO order limits but are at a sufficient distance not to be impacted.</p> <p>Natural England is a consultee under Requirement 19 (Code of Construction Practice). The details of any final buffer zone will be set out within the Code of Construction Practice (see section 2.5.11).</p>	<p>We note mitigation for air emissions is included in Section 9 of the OCoCP (Revision F) [with a commitment to finalising this post consent in the detailed design phase of influence. Natural England requests to be a named consultee of this management plan.</p> <p>Natural England welcomes the inclusion of the 30m buffer zone for Colton Wood is added to Section 3.3.1 of the OCoCP. As advised at Deadline 2, the effects on air quality requires consideration of a large buffer zone (<a href="https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions">https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions</a>). The onus will be on the Applicant to demonstrate it is sufficient.</p>	Agreed

## 2.2 Onshore Ecology and Ornithology

Table 4: Summary of consultation with Natural England regarding onshore ecology and ornithology

Date	Contact Type	Topic
<b>Pre-Application</b>		
28/01/2020	Expert Topic Group (ETG) Meeting 1	<p>The following topics were discussed during the ETG meeting 1:</p> <ul style="list-style-type: none"> <li>• Scope of ecological survey work;</li> <li>• Approach to Extended Phase 1 Habitat Survey; and</li> <li>• Approach to over-wintering bird survey and the selected target species.</li> </ul>
10/12/2020	ETG Meeting 2	<p>The following topics were discussed during the ETG meeting 2:</p> <ul style="list-style-type: none"> <li>• Approach and methodology to over-wintering bird surveys;</li> <li>• Use of available over-wintering bird survey data from other projects;</li> <li>• Approach and methodology to breeding bird surveys;</li> <li>• Approach and methodology to great crested newt surveys;</li> <li>• Approach and methodology to bat surveys;</li> <li>• Preliminary findings from the Extended Phase 1 habitat Survey;</li> <li>• Biodiversity Net Gain opportunities; and</li> <li>• Approach to data gaps.</li> </ul>
10/06/2021	Section 42 Consultation	Natural England's response to Section 42 consultation on the PEIR. Appendix 4 of the <a href="#">Consultation Report</a> [APP-033].
01/07/2021	ETG Meeting 3	<p>The following topics were discussed during the ETG meeting 3:</p> <ul style="list-style-type: none"> <li>• Update on survey results obtained to date and since last ETG meeting;</li> <li>• The use of bat survey data from other projects;</li> <li>• The use and deployment of static bat detectors;</li> <li>• Requirements for Letter(s) of No Impediment (LoNI);</li> <li>• Opportunities for habitat improvements and biodiversity net gain;</li> <li>• The use of bat boxes;</li> <li>• Approach to the Cumulative Impact Assessment (CIA);</li> <li>• Approach to white clawed crayfish surveys;</li> <li>• Fish surveys;</li> <li>• Inclusion of protected species within the water crossing method statement;</li> <li>• Approach to and requirement of outline management plans;</li> </ul>



Date	Contact Type	Topic
		<ul style="list-style-type: none"> <li>• Approach to data gaps;</li> <li>• eDNA surveys; and</li> <li>• Monitoring and replanting.</li> </ul>
30/06/2022	ETG Meeting 4	<p>The following topics were discussed during the ETG Meeting 4:</p> <ul style="list-style-type: none"> <li>• The approach taken for the initial BNG assessment; and</li> <li>• The approach taken for the initial BNG enhancement options.</li> </ul>
<b>Post-Application</b>		
03/02/2023	Email	Email with Natural England's updates to the draft SoCG
14/03/2023 – 03/07/2023	Email	Email correspondence with Natural England regarding emerging Pink-footed geese guidance.

**Table 5: Topics agreed, in discussion or not agreed in relation to onshore ecology and ornithology**

ID	The Applicant Position	Natural England Position	Position Summary
<b>EIA – Policy and Planning</b>			
1	All relevant plans and policies have been identified in Section 20.4 of ES <b>Chapter 20 - Onshore Ecology and Ornithology</b> (Revision C) [REP3-027] and these have been appropriately considered in the assessment.	Agreed	Agreed
<b>EIA – Baseline Environment</b>			
2	The ES adequately characterises the baseline environment in terms of Onshore Ecology and Ornithology as detailed in Section 20.5 of ES <b>Chapter 20 - Onshore Ecology and Ornithology (Revision C) [REP3-027]</b> .	<p>We consider the data and baseline characterisation is broadly suitable. However, as highlighted in our Relevant Reps [NE RR-063], some clarification was required on the degree of empirical data and use of standard methodology.</p> <p>Within the OEMP the Applicant has committed to ensure updated survey data follows standard methodology and coverage includes those areas unable to be previously surveyed.</p>	Agreed.
3	Survey methodologies for Phase 1 Habitat Surveys and Phase 2 surveys are appropriate and sufficient to inform the assessment. Onshore ecology surveys were undertaken in accordance with industry accepted guidance.	<p>Natural England considers the majority of the Phase 1 and 2 Habitat Surveys are appropriate.</p> <p>However please see ID6 below where we note the EMP commitment for a 2km NBIS search for protected and valued species.</p> <p>We advise a 2-5km data search would provide a better understanding of the use of the wider landscape by foraging bats. This area is not required for surveys, but should be considered as part of a wider data search. This item remains in discussion for post consent.</p>	Agreed

ID	The Applicant Position	Natural England Position	Position Summary
4	<p>Survey data, as presented in ES <b>Chapter 20 - Onshore Ecology and Ornithology (Revision C) [REP3-027]</b> and its associated appendices, are suitable for the assessment.</p> <p>The Reptile Survey Technical Appendix [APP-221] outlines that the concerns raised by Natural England are not considered to have had a substantial impact on the reliability of the survey results.</p> <p>See IDs 8 &amp; 9 below for further details of the Applicant's position in relation to bat survey data.</p>	<p>Natural England advises the Applicant has demonstrated that the reptile mitigation measures are sufficient given the suboptimal poor weather conditions in which the survey data were acquired. This issue is agreed.</p> <p>As ID8 and ID 9 below are concerns in relation to bat surveys are addressed.</p>	Agreed
5	<p>The suite of ecological surveys undertaken and presented in ES <b>Chapter 20 - Onshore Ecology and Ornithology (Revision C) [REP3-027]</b> and its associated appendices is relevant and suitable for the assessment.</p> <p>See ID 4 above for further details of the Applicant's position in relation to reptile surveys.</p> <p>See IDs 8 &amp; 9 below for further details of the Applicant's position in relation to bat survey data.</p> <p>See ID 30 and 31 below for further details of the Applicant's position in relation to Tree surveys and assessment.</p>	<p>Natural England considers the suite of surveys are suitable, however we raised concerns within our Relevant Repts [NE RR-063].</p> <p>As ID4 above, our concerns in relation to reptiles are addressed.</p> <p>As ID8 and 9 below are concerns in relation to bat surveys are addressed.</p> <p>As ID30 and 31 below, are concerns in relation to tree surveys and assessment are addressed.</p>	Agreed
6	<p>The use of existing data sets which cover the SEP and DEP order limits, including NBIS, is appropriate to inform the desk-based assessment and to fill data gaps.</p>	<p>As outlined in our R&amp;I Log, Natural England continues to advise that 50m is an arbitrary small distance. We note the EMP commitment for a 2km NBIS search for protected and valued species.</p>	Agreed

ID	The Applicant Position	Natural England Position	Position Summary
	<p>The Applicant will undertake pre-construction bat surveys focused on the Order Limits where direct impacts would occur and can be assessed and mitigated. Surveys of potential roost sites, Core Sustainance Zone's and functional linked land outside the route would not materially change the assessment or mitigation approach because bats would only be at risk of impact if using the Order Limits for some purpose (e.g. foraging). The same approach applies to other mobile species such as wintering birds, where surveys only cover the Order Limits rather than surrounding areas despite the fact birds (possibly including some of the same populations) will also forage there.</p> <p>As set out within the <b>Outline Ecological Management Plan (Revision E)</b> [document reference 9.19], Appendix A], an updated data search will be completed prior to construction. This data search will be within 2km of the Order Limits (see paragraph 25).</p> <p>It is noted that any NBIS bat records &gt;50m from the route could not be directly related to the impact assessment, given the potential for such records to be associated with different habitats (e.g. woodland) which is being avoided by the route but which may occur within &gt;50m of it. NBIS records within &lt;50m would be far more likely to emanate from the same habitat as would be affected by construction, and therefore can be related to the assessment.</p>	<p>We advise a 2-5km data search would provide a better understanding of the use of the wider landscape by foraging bats. This area is not required for surveys, but should be considered as part of a wider data search. This item remains in discussion.</p>	
7	<p>Sufficient survey data has been collected to inform the assessment as presented within ES <b>Chapter 20 - Onshore Ecology and Ornithology (Revision C) [REP3-027]</b>. Extrapolation methodologies and approaches to data gaps have been agreed where relevant.</p>	<p>Natural England welcomes the pre-construction survey information as set out in Appendix A of the EMP. We advise the DCO stipulates the requirement for pre-construction surveys to fill the data gaps and to ensure robust mitigation measures are secured through the OLEMS and the DCO.</p>	Agreed

ID	The Applicant Position	Natural England Position	Position Summary
	<p>The Applicant will carry out a programme of pre-construction surveys, as set out in the <b>Outline Ecological Management Plan (Revision E)</b> [document reference 9.19, Appendix A], noting that post-consent there will not be gaps in the manner that occurred pre-application because in the past agreements over access could not be made.</p> <p>See ID 4 above for further details of the Applicant's position in relation to reptile surveys.</p> <p>See IDs 8 &amp; 9 below for further details of the Applicant's position in relation to bat survey data.</p> <p>See ID 26, 30 and 31 below for further details of the Applicant's position in relation to Tree surveys and assessment.</p>	<p>As ID4 below are concerns are addressed.</p> <p>As ID 8 and 9 our concerns regarding bat survey data are agreed.</p> <p>As ID30 and 31 below, are concerns in relation to trees and assessment are addressed.</p>	
8	<p>The bat survey methodologies used are appropriate and adequate. This approach was agreed with Natural England and other stakeholders during ETG meetings.</p> <p>Two different survey methodologies focused on different aspects of bat behaviour/ecology: tree roost surveys for roosting bats, and static detector and transect surveys for bat activity (foraging and commuting bats).</p> <p>The results of the bat roost surveys were not used to inform the scope or location of bat activity surveys, and the results of bat activity surveys were not used to inform the scope of roost surveys because the presence of one type of behaviour does not necessarily mean the other will be impacted. For example, an area of importance for foraging or commuting bats may have no bat roosts.</p> <p>It is because of this distinction between bat behaviours and how they can be impacted that roost surveys were only completed where there was considered to be a risk of</p>	<p>Natural England welcomes the Applicant's clarification and considers this matter to be agreed.</p>	Agreed

ID	The Applicant Position	Natural England Position	Position Summary
	an impact to roosting bats (i.e. where a tree with roost potential was at risk of being felled).		
<b>EIA – Assessment Methodology</b>			
9	The study areas identified in Section 20.3 of ES <b>Chapter 20 - Onshore Ecology and Ornithology (Revision C) [REP3-027]</b> is appropriate for the assessment.	Natural England agrees with the study areas as presented in Section 20.3. However, we advise that with respect to the NBIS search area for bats (which used a 50m search area Alderford/Swannington) the methodology was not followed as highlighted in Points 3 and 6 above.	Agreed
10	The impact assessment methodologies used for the EIA, as presented in Section 20.4 of ES <b>Chapter 20 - Onshore Ecology and Ornithology (Revision C) [REP3-027]</b> , provide an appropriate approach to assessing potential impacts of the Projects.	Natural England agrees the matrix approach uses a standardised industry approach.  However, Natural England's standard advice for OWF projects is that in instances where significance has been presented as a range (i.e., minor or moderate), in the absence of evidence to support the lower value, it is the higher value of the range that should always be assessed in order to ensure that impacts on features are correctly taken forward through assessment. This is in line with the principles of the Rochdale envelope approach.	Not Agreed – no material impact
11	Section 20.6 of ES <b>Chapter 20 - Onshore Ecology and Ornithology (Revision C) [REP3-027]</b> represents a comprehensive list of the potential impacts.	Agreed.	Agreed.
12	The realistic worst-case assumptions presented in the assessment for the development scenarios, as outlined in Table 20-2 of ES <b>Chapter 20 - Onshore Ecology and Ornithology (Revision C) [REP3-027]</b> are appropriate.	Agreed.	Agreed
13	The assessment of cumulative impacts, as detailed in Section 20.7 of ES <b>Chapter 20 - Onshore Ecology and</b>	Natural agrees the assessment of cumulative impacts, is consistent with the agreed methodologies. However	Agreed

ID	The Applicant Position	Natural England Position	Position Summary
	<p><b>Ornithology</b> (Revision C) [REP3-027] is consistent with the agreed methodologies.</p>	<p>please see point 15 below. We consider this to be agreed.</p>	
<b>EIA – Project-Alone Assessment Conclusions</b>			
14	<p>The conclusions of the impact assessment as detailed in Section 20.6 of ES <b>Chapter 20 - Onshore Ecology and Ornithology (Revision C) [REP3-027]</b> are appropriate and are considered not significant in EIA terms.</p>	<p>Natural England advises while our concerns in relation to the baseline methodology will be addressed through commitments to pre-construction surveys, we have outstanding concerns in relation to potential impacts relating to bentonite breakout mitigation measures at water course crossings, bats (including in relation to the potential notification of the woodland adjacent to the River Wensum). See our comments to ID 19, 24, 29, 34 and 25 below.</p>	<p>Not Agreed - Material Impact.</p>
<b>EIA – Cumulative Impact Assessment (CIA) Conclusions</b>			
15	<p>The conclusions of the CIA as details in Section 20.7 of ES <b>Chapter 20 - Onshore Ecology and Ornithology (Revision C) [REP3-027]</b> are appropriate and are considered not significant in EIA terms.</p> <p>The Applicant has committed to engaging with other projects in the area including Norwich Western Link and the proposed solar farm at Cawston to ensure a coherent approach to mitigation wherever possible.</p> <p>The Applicant is aware of the planned solar farm development and that when the Local Planning Authority adopted it's Screening Opinion, it confirmed the proposed solar farm is not Environmental Impact Assessment (EIA) development as defined in the 2017 Regulations. Given the solar farm project is not EIA development, data is limited to allow a meaningful assessment, and as such has not been included in the Cumulative Impact Assessment (CIA). Although there is a potential spatial overlap between the two projects, it is understood the</p>	<p>Natural England welcomes the communication and the rationale provided under EIA regulations. No further action is required at this time. We consider this to be agreed.</p>	<p>Agreed</p>

ID	The Applicant Position	Natural England Position	Position Summary
	<p>proposed solar farm will require minimal construction works and as such, it is not anticipated there will be any cumulative effects arising from interactions between the project and SEP &amp; DEP. In addition, the DCO allows for trenchless techniques, e.g. Horizontal Directional Drilling (HDD) at this section of the cable corridor should the Solar Farm be constructed first.</p>		
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>			
16	<p>Schedule 2, Part 1, Requirements 13 of the <b>draft DCO (Revision K)</b> [document reference 3.1] is sufficient to secure that an Ecological Management Plan is submitted and approved by the relevant planning authority in consultation with Natural England prior to the commencement of onshore works including pre-commencement site clearance.</p> <p>The Applicant has discussed combining the OLMP and OEMP with the Local Authorities, the majority of whom have requested that the documents remain separate. On the basis that it will be the relevant local authorities that are responsible for discharging DCO requirements relating to these management plans, the Applicant proposes to keep the documents separate.</p>	<p>Based on experience with the complexity of multiple management plans for large NSIPs, Natural England advises, discharging conditions through the LPA when there are separate plans has and continues to be more difficult to achieve. We have recently encountered this with neighbouring projects requiring cross reference and sight of both the EMP and LMP. We strongly encourage and advise use of an OLEMS combining the EMP and LMP, as successfully undertaken for the East Anglia ONE North and TWO projects.</p> <p>Natural England queries whether partial discharges will be required as this creates further complexities when partial requirement discharges are required by the Applicant when liaising with multiple LPAs.</p>	Not Agreed – No Material Impact
17	<p>The <b>Outline Ecological Management Plan (Revision E)</b> [document reference 9.19] includes all relevant mitigation measures specified in ES <b>Chapter 20 - Onshore Ecology and Ornithology</b> (Revision C) [REP3-027] and is appropriate for managing post construction impacts from Projects on landscape receptors.</p> <p>See ID 17 for the Applicant's position on an OLEMS.</p>	<p>Natural England has commented in our Relevant Representation [NE RR-063], however as above, it is our preference for an OLEMS to be secured and as such has not fully reviewed the Outline Ecological Management Plan. See ID17 above.</p>	Not Agreed – No Material Impact



ID	The Applicant Position	Natural England Position	Position Summary
18	<p>The <b>Outline Code of Construction Practice (Revision D)</b> [document reference 9.17] includes all relevant mitigation measures specified in ES <b>Chapter 20 - Onshore Ecology and Ornithology</b> (Revision C) [REP3-027] and is appropriate for managing construction and post construction impacts from Projects on ecological receptors.</p> <p>In addition, the controls set out within Requirements 11 (Provision of Landscaping) and 13 (Ecological Management) Plan of the <b>draft DCO (Revision K)</b> [document reference 3.1] which specifically cover tree and hedgerow surveys and tree protection zones will inform detail design and final construction method statements which will be submitted to and approved under Requirement 19 (Code of Construction Practice) of the draft DCO [document reference 3.1]</p> <p>Further information is contained within ID29 below.</p>	<p>While we recognise our previous comments in relation to trees are resolved within the OCoCP and that Natural England will be a named consultee moving forward, there are still outstanding concerns relating to the Outline CoCP as outlined in our R&amp;I Log, response to ExA questions and the RIES, such as the bentonite breakout mitigation measures at water course crossings. Therefore, this item remains unresolved at the close of examination.</p>	<p>Not Agreed – Material impact</p>
19	<p><b>Pre-construction Ecological Surveys – general</b></p> <p>The Applicant has committed to a range of pre-construction ecological surveys, the results of which will be used to inform the mitigation required for habitats and/or species.</p> <p>The Applicant’s proposed approach to pre-construction onshore ecological and ornithological surveys is detailed in the <b>Outline Ecological Management Plan (Revision E)</b> [document reference 9.19, Appendix A] which is secured by Requirement 13 of the <b>draft DCO (Revision K)</b> [document reference 3.1].</p> <p>The approach is appropriate and sufficiently set out.</p>	<p>As stated in our R&amp;I Log, Natural England welcomes the Applicant’s commitments to pre-construction surveys and Reasonable Avoidance Measures (RAMS) for GCN, amphibians and reptiles.</p> <p>Where the Applicant is not carrying out pre-construction surveys, i.e. breeding birds and reptiles, Natural England advises habitats should be maintained as per our advice/the Applicant’s methods (e.g. grassland mown etc.) to limit the suitability of the site for protected species and to deter individual moving onto the site. If this is not completed then pre-construction surveys will be required to determine the presence of Protected species.</p>	<p>Agreed</p>

ID	The Applicant Position	Natural England Position	Position Summary
		<p>For any habitat/species surveys that the Applicant is not proposing pre-construction surveys, if the Extended Habitat Survey finds habitats have changed substantially since previously, we advise further surveys may be required.</p>	
20	<p><b>Extended UK Habitat Classification Survey</b>            The range of pre-construction ecological surveys committed to, including an Extended UK Habitat classification survey of the entire Order Limits are appropriate and sufficient. These are set out within the <b>Outline Ecological Management Plan (Revision E)</b> [document reference 9.19] and secured by Requirement 13 of the <b>draft DCO</b> [document reference 3.1]. The results of these surveys will be used to inform the mitigation required for habitats and/or species.</p> <p>The Applicant has committed to a range of pre-construction ecological surveys, which will include an Extended UK Habitat classification survey of the entire Order Limits.</p> <p>Surveys will identify and map habitats such as hedgerows, uncultivated fields and field margins, which can be used to inform the mitigation requirements for species affected by works to these habitats, including but not limited to bat commuting and foraging routes associated with Alderford Common/Swannington Ugate Common SSSIs.</p> <p>Further mitigation measures are detailed in the <b>Outline Ecological Management Plan (Revision E)</b> [document reference 9.19 2.3.2].</p>	<p>While we welcome mitigation measures for skylark to discourage nesting skylarks and should they be found to be present prior to construction activities we advise the Applicant commits to having an ECoW enforcing an appropriate (to the location and species) works exclusion zone whilst the nest is in use.</p> <p>Natural England welcomes the Applicant's clarification that updated pre-construction surveys for bats will be undertaken as outlined in the EMP [REP3-068].</p>	Agreed

ID	The Applicant Position	Natural England Position	Position Summary
21	<p><b>Breeding Birds</b></p> <p>Mitigation measures in the <b>Outline Ecological Management Plan (Revision E)</b> [document reference 9.19, Section 2.3.2], secured by Requirement 13 of the <b>draft DCO (Revision K)</b> [document reference 3.1] in relation to breeding birds, including Skylark and Crossbill are appropriate and adequate.</p> <p>Measures include an ECoW to monitor for nesting birds with a commitment not to commence works in areas where to do so would pose a realistic risk of displacing nesting birds.</p>	<p>Natural England's concerns regarding breeding birds are addressed within the EMP.</p> <p>As ID20 above, should skylarks be found to be present prior to construction activities, we advise the Applicant commits to having an ECoW enforcing an appropriate (to the location and species) works exclusion zone whilst the nest is in use. Providing this commitment is undertaken we consider this is agreed.</p>	Agreed
22	<p><b>Bats</b></p> <p>The range of pre-construction ecological surveys committed to, in relation to bats, are appropriate and sufficient. These are set out within the <b>Outline Ecological Management Plan (Revision E)</b> [document reference 9.19], secured by Requirement 13 of the <b>draft DCO (Revision K)</b> [document reference 3.1]. The results of these surveys will be used to inform the mitigation required for habitats and/or species.</p> <p>The pre-construction walkover survey of the whole route (consisting of an Extended UK Habitat classification survey) will appraise the potential for protected species including a ground level appraisal of the Bat Roost Potential (BRP) of all trees. Any trees which are found to have Moderate or High BRP in accordance with Bat Conservation Trust criteria, will be subject to further surveys and, if necessary, mitigation under the terms of a Natural England approved EPS Mitigation Licence.</p> <p>There is also a commitment to brief all tree surgeons (as site personnel) working on tree removal for SEP and DEP to the requirements set out in the EMP and the site-wide</p>	<p>As ID 19 above, Natural England welcomes the Applicant's clarification that updated pre-construction surveys for bats will be undertaken as outlined in the EMP [REP3-068]. As advised in our Risk and Issues Log, we consider this matter is agreed.</p>	Agreed

ID	The Applicant Position	Natural England Position	Position Summary
	<p>ecological requirements, which would include the potential presence of bat roosts [REP3 060, Section 1.2.4].</p> <p>Therefore, in the event that trees previously identified as having no/negligible BRP subsequently develop BRP (in the period between when surveys are completed and when trees are to be removed, which will be targeted to take place within a few months only), the tree surgeons would be able to respond accordingly (i.e. inform the ecologist who will then determine if tree felling needs to be delayed to allow for surveys and, if necessary, licensed mitigation to be completed).</p>		
23	<p><b>Bats</b></p> <p>The <b>Outline Code of Construction Practice (Revision D)</b> [document reference 9.17, Section 3.7], secured by Requirement 19 of the <b>draft DCO (Revision K)</b> [document reference 3.1], contains suitable mitigation measures to manage emissions from artificial light during construction. These measures will be in accordance with Bats and Lighting in the UK guidance (Bat Conservation Trust and Institute of Lighting Engineers, 2018).</p> <p>The final lighting plan will follow guidance and would need to be approved by the Local Planning Authority, in consultation with Natural England, prior to implementation.</p>	<p>As advised in our Risk and Issues Log, Natural England welcomes the mitigation measures within the Outline CoCP [REP5-030] to manage emissions from artificial light during construction in accordance with Bats and Lighting in the UK guidance (Bat Conservation Trust and Institute of Lighting Engineers, 2018). In order to resolve this issue we advise an additional measures are included to ensure lighting is directed away from habitats/linear features. This is included in the guidance, but not stipulated within the Outline CoCP.</p>	Agreed
24	<p><b>Badger</b></p> <p>The range of pre-construction ecological surveys committed to, in relation to badger, are appropriate and adequate. The results of these surveys will be used to inform the mitigation required for habitats and/or species.</p>	<p>As advised in our Risk and Issues Log, Natural England notes the Applicant has committed to completing a pre-construction badger survey covering the Order Limits and a surrounding 30m buffer as detailed in the Outline Ecological Management Plan (Revision C) [REP3-068, Appendix A]. This will include the sections of the Order Limits which were</p>	Agreed

ID	The Applicant Position	Natural England Position	Position Summary
	<p>As detailed in Section 2.3.4 of the <b>Outline Ecological Management Plan (Revision E)</b> [document reference 9.19], pre-construction badger surveys would be undertaken to confirm the location and status of badger setts within and up to 30m from the entire DCO order limits, including previously identified active and disused setts. The findings from the pre-construction surveys will inform precise mitigation requirements, including any necessary badger licences to close any active setts which could be damaged or disturbed by proposed works.</p>	<p>previously inaccessible. Natural England advises this matter is agreed.</p>	
25	<p><b>Wintering Birds</b>            Section 2.3.1 Wintering birds in the <b>Outline Ecological Management Plan (Revision E)</b> [document reference 9.19] sets out the commitment to prepare a pink-footed goose mitigation plan. The Applicant considers that are alternative mitigation options to what is set out within the Best Practice Guidance [REP1-137] which may be more suitable. The Applicant will develop the final mitigation plan in consultation with Natural England. This will be submitted to Natural England approved by the relevant regulatory authority prior to construction.</p>	<p>Natural England understands the Applicant does not wish to progress best practice guidance for PFG mitigation. Therefore, as advised in our R&amp;I log there is insufficient time remaining within the examination to inform an agreed PFG mitigation plan.</p> <p>The Applicant has committed to a pink footed geese mitigation plan within the Outline EMP and to further engage with NE post examination.</p> <p>As our concerns as to what the PFG mitigations will include remain outstanding, our position is that we are unable to provide the decision maker the necessary comfort that appropriate mitigation measures will be adopted to remove or reduce the risk of the likelihood of AEoI to the PFG feature of the North Norfolk Coast SPA and Ramsar.</p> <p>At Deadline 8 and in response to the Rule 17 letter Natural England advises a condition is included within the DCO that a standalone PFG mitigation plan will be submitted to the LPA for agreement with relevant</p>	<p>Not Agreed – Material Impact</p>

ID	The Applicant Position	Natural England Position	Position Summary
		<p>SNCB's at least 4 months prior to any works commencing.</p>	
26	<p><b>Reptiles</b></p> <p>As set out in the Pre-construction reptile surveys would only be completed if new areas of suitable reptile habitat are found during the <b>Outline Ecological Management Plan (Revision E)</b> [document reference 9.19], pre-construction Extended UK Habitat classification surveys, or if new information on reptile distribution comes to light (such as NBIS records) and that this is deemed appropriate.</p> <p>In the event that new sites are surveyed for reptiles and these surveys confirm the presence of reptiles, this information will be submitted to the relevant planning authority, along with a proposed mitigation approach for the site/s, as part of the submission of results of preconstruction surveys.</p> <p>This approach is detailed in the <b>Outline Ecological Management Plan (Revision E)</b> [document reference 9.19, Appendix A].</p>	<p>See also ID 20 above, however following review of the EMP Rev.C [ REP3-068] we consider our concerns regarding pre-construction survey and mitigation measures for reptiles are addressed and therefore this matter is resolved.</p>	Agreed
27	<p><b>Invasive Non-Native Species</b></p> <p>Details of mitigation and best practice measures to prevent the spread of non-native invasive species contained within the <b>Outline Code of Construction Practice (Revision D)</b> [document reference 9.17, Section 9] and <b>Outline Ecological Management Plan (Revision E)</b> [document reference 9.19, Section 2.3.9] are appropriate. These plans are secured by Requirement 19 and 13 of the draft DCO [document reference 3.1] respectively</p>	<p>As updated within our Risk and Issues Log Natural England welcomes the Applicant's clarification which details of mitigation is included within the Outline CoCP [ REP5-030] and EMP [REP3-068]. While it is our preference that an outline INNS management plan is submitted prior to the close of examination, we acknowledge Natural England will be a named consultee for this plan. Therefore for the purposes of examination we consider this matter is agreed.</p>	Agreed

ID	The Applicant Position	Natural England Position	Position Summary
	<p>The Applicant has committed via the Outline Code of Construction Practice to producing an Invasive Non-Native Species Management Plan, to be agreed with the Environment Agency and Natural England in advance of construction, which will set out measures to prevent transfer of invasive plant or animal species between watercourses.</p> <p>The Outline Code of Construction Practice is secured by Requirement 19 of the <b>draft DCO (Revision K)</b> [document reference 3.1]. The Ecological Management Plan is secured by Requirement 13 (Ecological management plan) of the <b>draft DCO (Revision K)</b> [document reference 3.1].</p>		
28	<p><b>Wensum Woods</b></p> <p>As no woodland habitat which is expected to be designated as the potential Wensum Woods SSSI would be removed, there should be no concerns that draft licences and the LoNI regarding mitigation requirements for roosting bats would leave bats roosting in the potential Wensum Woods SSSI under protected.</p> <p>Any impacts to Core Sustenance Zones would be informed by pre-construction surveys, which are secured within the <b>Outline Ecological Management Plan (Revision E)</b> [document reference 9.19], which is already secured by Requirement 13 (Ecological Management Plan) of the <b>draft DCO (Revision K)</b> [document reference 3.1].</p> <p>The concerns raised by Natural England with regard to the potential future notification of the SSSI are noted. The Applicant has committed to the reinstatement of habitats following the completion of construction. Habitats will be reinstated in accordance with the agreed specifications,</p>	<p>As updated within our D7 Risk and Issues Log the Applicant's response at Deadline 4 [REP4-031] states that features connected to Wensum Woods will be scoped into pre-construction surveys. Natural England welcomes this commitment but wish to re-iterate our comment relates to potential habitat loss and ensuring that the development does not hinder potential future notification of the SSSI.</p> <p>While NE welcomes the Applicant's commitment to reinstate habitat loss post construction, Natural England remains concerned about the duration of the impacts to protected species based on the build out scenario.</p>	No Agreed – Material Impact

ID	The Applicant Position	Natural England Position	Position Summary
	as detailed in the OEMP (Revision C) [document reference 9.17, Section 4.1].		
29	<p><b>Arboricultural Surveys</b></p> <p>The commitment to carry out a full Arboricultural Survey of the Order Limits prior to-construction is appropriate. This is set out in the <b>Outline Landscape Management Plan [REP5-031]</b> and secured by Requirement 11 in the <b>draft DCO (Revision K)</b> [document reference 3.1].</p>	<p>The Applicant's commitment to carry out a full arboricultural tree survey of the Order Limits as set out in the <b>Outline Landscape Management Plan [REP5-031]</b> and secured by Requirement 11 in the <b>draft DCO (Revision I)</b> [REP6-002] is agreed.</p>	Agreed.
30	<p><b>Arboricultural Surveys</b></p> <p>The details on Tree Root Protection Plans and buffer zones, as set out within the <b>Outline Ecological Management Plan (Revision E)</b> [document reference 9.19, Section 2.2] are appropriate.</p> <p>These requirements are mirrored in the <b>Outline Code of Construction Practice (Revision D)</b> [document reference 9.17, Section 3.3.1] which states that a 30m buffer from the ancient woodland, Colton Wood, will be maintained at all times in which no construction vehicles and machinery will enter and no materials or activities will take place.</p> <p>In addition, buffer zones surrounding retained areas of woodland and trees will have a radius of at least 12 times the stem diameter of the tree (or 15 times the stem diameter for veteran/ancient trees) as advised by the Arboriculturist and informed by Tree Protection Plans. RPAs around hedgerows will be assessed by the ECoW [REP5-030, para.62].</p> <p>The Arboricultural Method Statement and Tree Protection Plans will be submitted to the local planning authority for approval prior to construction commencement. This is</p>	<p>Natural England welcomes the addition of the specified 30m buffer zone for Colton Wood added to Section 3.3.1 of the OCoCP. In addition, we welcome the inclusion of individual tree buffer zone and within the Outline OCoCP. We advise this information is transparent between the EMP and CoCP.</p>	Agreed



ID	The Applicant Position	Natural England Position	Position Summary
	<p>secured under Requirement 11(e) of the <b>draft DCO (Revision K)</b> [document reference 3.1]</p>		
31	<p><b>Monitoring and Replanting</b>            The commitments to post construction monitoring and replanting as presented in the <b>Outline Ecological Management Plan (Revision E)</b> [document reference 9.19 Section 5.3] are appropriate.            The Ecological Management Plan is secured by Requirement 13 (Ecological management plan) of the <b>draft DCO (Revision K)</b> [document reference 3.1].            Requirement 11 (Provision of landscaping), subparagraph (c) of the <b>draft DCO (Revision K)</b> [document reference 3.1], requires the landscaping scheme to include cultivation, treatment of materials and other operations to ensure plant establishment. This would include any adaptive measures to ensure effective establishment</p>	<p>While Natural England welcomes the Applicant's approach and commitment to post construction monitoring and replanting within the EMP, we continue to advise the Applicant provides further detail within the Outline EMP to ensure mitigation measures remain adaptive should they not be effective. This is not currently reflected as such within Requirement 11.</p>	Agreed
32	<p><b>Monitoring and Replanting</b>            The commitment to replace planting of hedgerow and hedgerow trees within a 10-year monitoring and maintenance period as per Section 1.4.2 of the <b>Outline Landscape Management Plan (Revision B)</b> [document reference 9.18] and paragraph 103 of the <b>Outline Ecological Management Plan (Revision E)</b> [document reference 9.19] is appropriate.</p>	<p>Natural England agrees to the commitment to the replacement planting and 10-year monitoring and maintenance period but would like this detailed within the OLEMS.            Please see ID17 and ID18 in relation to our position regarding the OLEMS.</p>	Agreed
33	<p><b>Water Crossings</b>            The <b>Outline Code of Construction Practice (Revision D)</b> [document reference 9.17] contains adequate and appropriate mitigation measures for watercourse crossings (Section 7.1.3).            The Applicant has committed to producing a Water Crossing Scheme for each watercourse crossing,</p>	<p>We note and welcome that the OCoCP contains mitigation measures for sediment management, pollution prevention. While we advise an outline water course crossing scheme is submitted during the consenting phase, Natural England requests to be a named consultee of these plans .</p>	Not agreed – no material impact

ID	The Applicant Position	Natural England Position	Position Summary
	<p>diversion and reinstatement. This will include site specific details regarding sediment management and pollution prevention measures. The <b>Outline Code of Construction Practice</b> is secured by Requirement 19 of the <b>draft DCO (Revision K)</b> [document reference 3.1].</p> <p>The <b>Outline Code of Construction Practice (Revision D)</b> [document reference 9.17] states in section 2.5.4 “The cable entry and exit pits will be at least 9m from the banks of the watercourse (in line with the permitting requirement for EA/IDB)”.</p> <p>The <b>Outline Ecological Management Plan (Revision E)</b> [document reference 9.19] states in section 2.3.5 “A works-free buffer zone of at least 15m would be established around watercourses supporting water voles until a Natural England licence has been obtained”.</p>	<p>Natural England welcomes the Applicant's clarification that the Outline CoCP [REP5-030] details that cable entry and exit pits will be at least 9m from the banks of the watercourse. This is not as precautionary as NE advised. Therefore, we continue to advise that the works should be at least 9m but greater if pre-construction evidence demonstrates it is required.</p> <p>Please refer to Natural England's standing advice: <a href="https://www.gov.uk/guidance/water-voles-advice-for-making-planning-decisions">https://www.gov.uk/guidance/water-voles-advice-for-making-planning-decisions</a>.</p>	
34	<p><b>Water Crossings</b></p> <p>The commitment to provide a Bentonite Breakout Plan, as required by the Code of Construction Practice, prior to construction is appropriate. This will be informed by further detailed design and surveys including hydrofracture survey at all drill sites. A site-specific risk assessment will then be undertaken as part of the post consent detailed design process (see paragraph 133 of the <b>Outline Code of Construction Practice (Revision D)</b> [document reference 9.17]. This will include measures to ensure drilling stops once a breakout is reported (there will be a drop in pressure at the drill head). The Applicant's position is that this provides an appropriate approach.</p> <p>The Applicant confirms the inclusion of the following requirement in the <b>Outline Code of Construction Practice (Revision E)</b> [REP5-050], para. 138: “All bentonite breakouts within designated sites are to be</p>	<p>As advise in our D7 R&amp; I Log (Appendix K4) Natural England notes and welcome that the OCoCP contains mitigation measures for sediment management, pollution prevention and bentonite breakout, and that a bentonite breakout plan will be developed post consent. Also that the HDD compound located on the floodplain of the river Wensum (but outside the SSSI and SAC) will be restored in accordance with the River Wensum Restoration Strategy and the River Wensum SACO as committed within the outline EMP [REP3-068].</p> <p>However, we advise that until an outline bentonite mitigation plan is agreed, Natural England is unable to conclude with certainty that the likelihood of AEoI to the white-clawed crayfish, brook lamprey and bullhead features of the River Wensum SAC can be avoided. Please see our advice on these measures in our comments to the RIES in Appendix L5 at D7. Natural</p>	Not Agreed – Material Impact

ID	The Applicant Position	Natural England Position	Position Summary
	<p>reported to Natural England as soon as possible and within 24 hours.”.</p> <p>The Applicant also refers Natural England to the <b>Report to Inform the Appropriate Assessment (RIAA) (onshore) Technical Note [REP2-050]</b> which assesses the potential impact of a bentonite breakout on features of interest of the River Wensum SAC (including lamprey species and supporting habitats).</p> <p>The Applicant refers to the latest version of the Outline Code of Construction Practice (Revision G) [document reference 9.19, para 144] which states: A Bentonite Breakout Management Plan will be agreed with the Environment Agency prior to commencement of construction activities. <u>To further reduce the risk of AEol to the River Wensum SAC, Natural England will be consulted on the Bentonite Breakout Plan that will be submitted in respect of works that cross the River Wensum.</u></p>	<p>England requests to be a named consultee (as committed to within the OCoCP) of these plans.</p>	
<b>Other Matters as Required</b>			
35	<p>The <b>Joint Natural England and Applicant Position on HRA Conclusions and Derogation Requirements [REP3-103, Appendix B.2 - WQ2.14.1.1]</b> suitably sets out and demonstrates agreement on the Onshore HRA screening outcomes and assessment conclusions.</p>	<p>Natural England is in agreement that the HRA screening is appropriate within the Joint Position Table.</p> <p>However, as ID34 above, Natural England is unable to conclude with certainty that the likelihood of AEol to the white-clawed crayfish, brook lamprey and bullhead features of the River Wensum SAC can be avoided.</p> <p>In addition as ID26 above, our concerns as to what the PFG mitigations will include remain outstanding at the close of examination, and therefore our position is</p>	Not Agreed – Material Impact

ID	The Applicant Position	Natural England Position	Position Summary
		that we are unable to provide the decision maker the necessary comfort that appropriate mitigation measures will be adopted to remove or reduce the risk of the likelihood of AEoI to the PFG feature of the North Norfolk Coast SPA and Ramsar.	
36	The approach to Biodiversity Net Gain, as presented in the <b>Outline Biodiversity Net Gain Strategy</b> [APP-306], provides an appropriate approach to consideration of net gain within the Projects.	Agreed.	Agreed
37	The assessment methodologies used for the Biodiversity Net Gain Assessment, as presented in the <b>Initial Biodiversity Net Gain Assessment</b> [APP-219], provide an appropriate approach to assessing potential impacts of the Projects.	Agreed.	Agreed
38	The great crested newt District Level Licence application is appropriate and has been applied for in parallel with the DCO application. Details are provided in <b>Planning Statement – Appendix 9.1.1 – Details of Other Consents and Licenses</b> [APP-286] (Annex 3).	IAPC has been awarded by the NE Wildlife Licencing Service and 1st Stage payment made by Equinor April May 2022 for the Norfolk and Suffolk District Level Licencing Scheme.	Agreed
39	As detailed in the <b>Outline Ecological Management Plan (Revision E)</b> [document reference 9.19, Section 2.3.7], the Applicant has committed to going beyond the requirements of the District Level License (DLL) during preconstruction activities and will be applying a number of techniques to reduce the probability of impacting great crested newt, collectively termed ‘Reasonable Avoidance Measures’ (RAMs).  The Applicant’s commitments to post construction monitoring is presented in the <b>Outline Ecological Management Plan (Revision E)</b> [document reference 9.19, Section 5.3].	Natural England welcomes the Applicant’s commitment regarding RAMs for GCN.  We advise the Applicant provides further detail within the Outline EMP with regards to post construction monitoring to ensure mitigation measures remain adaptive should they not be effective.	Not Agreed – No Material Impact

ID	The Applicant Position	Natural England Position	Position Summary
40	<p>The Letter of No Impediment containing the draft mitigation licenses for bat roosts, as detailed in the draft European Protected Species (EPS) License, <b>Planning Statement – Appendix 9.1.1 – Details of Other Consents and Licenses</b> [APP-286] is appropriate. This has been obtained in parallel to the DCO application.</p>	<p>A Draft Letter of No Impediment for bats was provided to the Applicant by Natural England in July 2022.</p>	Agreed
41	<p>The Letter of No Impediment containing the draft mitigation license for badger setts, as detailed in the draft Protected Species License, <b>Planning Statement – Appendix 9.1.1 – Details of Other Consents and Licenses</b> [APP-286] is appropriate. This has been obtained in parallel to the DCO application.</p>	<p>A Draft Letter of No Impediment for badger setts was provided to the Applicant by Natural England in July 2022.</p>	Agreed
42	<p>The approach of determining any temporary diversions to Public Rights of Way (PRoW) prior to commencement of works is appropriate. Where diversions are required outside the Order Limits, the Applicant will seek to use the existing PRoW network, where possible. Where diversions are within the Order Limits, these will be informed, in part, by the results of further surveys, e.g. Extended UK Habitat classification surveys, where required. Routing would seek to avoid protected species or sensitive habitats, where possible. This will be set out within the Public Rights of Way Strategy secured under Requirement 24 of the draft DCO [document ref 3.1]</p>	<p>We note and welcome the Applicant's clarification that routing would seek to avoid protected species or sensitive habitats, where possible. We advise this is secured in the DCO as indicated by the Applicant or a relevant plan or document in order to resolve this issue.</p>	Agreed.
43	<p>The <b>Outline Code of Construction Practice (Revision D)</b> [document reference 9.17] contains appropriate and adequate mitigation measures for soil management (Section 6.1).</p> <p>The Applicant has committed to producing a Soil Management Plan which will be produced as part of the CoCP. This will define the site specific mitigation measures and best practice techniques required to be</p>	Agreed.	Agreed.

ID	The Applicant Position	Natural England Position	Position Summary
	<p>followed by all to protect soil resources. The Outline Code of Construction Practice is secured by Requirement 19 of <b>draft DCO (Revision K)</b> [document reference 3.1].</p> <p>In addition, a Construction Practice Addendum has been produced which contains further details relating to pre-construction soil surveys. This will be included in the Heads of Terms with Landowners/Occupiers and will also form part of the final Code of Construction Practice.</p> <p>The Applicant's position is that this forms an appropriate approach.</p>		

## 2.3 Landscape and Visual Impact

*Table 6: Summary of consultation with Natural England regarding landscape and visual impact*

Date	Contact Type	Topic
Pre-Application		
23/03/2020	ETG Meeting 1	<p>The following topics were discussed during the ETG meeting 1:</p> <ul style="list-style-type: none"> <li>• The approach to visualisations;</li> <li>• The approach to data sources;</li> <li>• An agreement on the landscape character areas to be included in assessment;</li> <li>• The approach to visual receptors;</li> <li>• The key landscape designations and features to be included in the assessment;</li> <li>• Agreement to the list of potential impacts;</li> <li>• The approach to the assessment of visual amenity; and</li> <li>• The approach to the assessment of effects on the AONB.</li> </ul>
24/11/2020	Pre-Section 42 Consultation	Consultation via email correspondence on the proposed approach to the Landscape and Visual Impact Assessment's (LVIA) 1km study area from the onshore cable corridor was undertaken.
10/06/2021	Section 42 Consultation	Natural England provided a response to the PEIR; commenting on the topic of landscape and visual impacts in the document entitled 'Seascape and Landscape Visual Impact Assessment (SLVIA) Natural England's Specialist Review of the 'Offshore' Elements of the DEP and SEP PEIR'. See Appendix 4 of the <a href="#">Consultation Report</a> [APP-033] for further details.
21/07/2021	ETG Meeting 2 (Parts 1 & 2 of 2)	<p>The following topics were discussed during the ETG meeting 2:</p> <ul style="list-style-type: none"> <li>• The LVIA as presented in PEIR and S42 consultation;</li> <li>• The requirements for an Outline Landscape Management Plan (OLMP) and Outline Ecological Management Plan (OEMP); and</li> <li>• The commitment to a 10-year replanting period.</li> </ul>
08/02/2022	ETG Meeting 3 (Parts 1 & 2 of 2)	<p>The following topics were discussed during the ETG meeting 3:</p> <ul style="list-style-type: none"> <li>• Assessment of the Norfolk Coast AONB;</li> <li>• LVIA as presented in the ES;</li> <li>• The approach to Arboricultural Surveys, OLMP / OEMP and data collection; and</li> <li>• The approach to the Project Vision and Design &amp; Access Statement (DAS).</li> </ul>
Post-Application		
03/02/2023	Email	Email with Natural England's updates to the draft SoCG.

*Table 7: Topics agreed, in discussion or not agreed in relation to landscape and visual impact*

ID	The Applicant Position	Natural England Position	Position Summary
<b>EIA – Policy and Planning</b>			
1	<p>All relevant plans and policies have been identified in Section 26.4 of ES <b>Chapter 26 - Landscape and Visual</b> [APP-112] and these have been appropriately considered in the assessment.</p> <p>Discussed and agreed in ETG meeting 2 (Part 1 of 2), 21/07/2021.</p>	<p>Natural England has deferred to the local knowledge of the other expert ETG members.</p>	<p>Agreed</p>
<b>EIA – Baseline Environment</b>			
2	<p>The ES adequately characterises the baseline environment in terms of landscape and visual as detailed in Section 26.4 of ES <b>Chapter 26 - Landscape and Visual</b> [APP-112]. ETG meeting 2 (Part 1 of 2), 21/07/2021 discussed and confirmed that the ETG agreed with the following, as identified and assessed in the LVIA that was presented in the PEIR Chapter: the landscape character areas / types; the visual receptors; and the designated landscapes identified and assessed in the LVIA.</p>	<p>Natural England has deferred to the local knowledge of the other expert ETG members.</p>	<p>Agreed</p>
3	<p>The following list of data sources was identified for assessment:</p> <ul style="list-style-type: none"> <li>• National Landscape Character Area Profiles, 'North Norfolk Landscape Character Assessment' DRAFT Supplementary Planning Document 2018;</li> <li>• 'North Norfolk Landscape Sensitivity Assessment' DRAFT Supplementary Planning Document 2018;</li> <li>• 'Broadland District Landscape Character Assessment' 2008 (updated 2013);</li> </ul>		<p>Agreed</p>



ID	The Applicant Position	Natural England Position	Position Summary
	<ul style="list-style-type: none"> <li>'South Norfolk District Landscape Character Assessment' 2001 (updated 2006 and 2008);</li> <li>'South Norfolk District Landscape Designations Review' 2012;</li> <li>'Norfolk Coast Area of Outstanding Natural Beauty 2019-24 Management Plan', Norfolk Coast Partnership; and</li> <li>'Norfolk Coast AONB Integrated Landscape Character Guidance', Norfolk Coast Partnership.</li> </ul> <p>Discussed and agreed in ETG meeting 1, 23/03/2020, reaffirmed at ETG meeting 2 (Part 1 of 2), 21/07/2021.</p> <p>Subsequent to the above, ETG meeting 3 (Part 2 of 2), 08/02/2022 agreed that Norfolk Coast Area of Outstanding Natural Beauty Management Plan Strategy 2014-2019 should be used to inform the LVIA, due to the uncertainty of the ratification of the latest Norfolk Coast Area of Outstanding Natural Beauty Five Year Strategy 2019-2024.</p>		
4	<p>The following list of visual receptors is appropriate for assessing visual effects:</p> <ul style="list-style-type: none"> <li>Settlements;</li> <li>Public Rights of Way;</li> <li>Beach / coastal margin and other accessible landscapes;</li> <li>Key routes road and rail;</li> <li>Key routes recreational (long distance walking routes, cycle routes); and</li> <li>Specific viewpoints.</li> </ul>		Agreed

ID	The Applicant Position	Natural England Position	Position Summary
	<p>Discussed and agreed in ETG meeting 1, 23/03/2020, reaffirmed at ETG meeting 2 (Part 1 of 2), 21/07/2021.</p>		
5	<p>The following list of landscape designations and areas or features protected by policy for consideration with regard to onshore landscape and visual impact assessment is appropriate:</p> <ul style="list-style-type: none"> <li>• Norfolk Coast AONB;</li> <li>• Rural River Valleys and Valley Urban Fringe landscape character types (South Norfolk Local Plan DMPD Policy DM 4.5);</li> <li>• Norwich Southern Bypass Landscape Protection Zone (NSBLPZ); and</li> <li>• Key Viewing Cones and Undeveloped Approaches to Norwich (South Norfolk Local Plan DMPD Policy DM 4.6).</li> </ul> <p>Discussed and agreed in ETG meeting 1, 23/03/2020, reaffirmed at ETG meeting 2 (Part 1 of 2), 21/07/2021.</p>		Agreed
6	<p>Sufficient survey data has been collected to inform the assessment as presented within ES <b>Chapter 26 - Landscape and Visual</b> [APP-112].</p>		Agreed
<b>EIA – Assessment Methodology</b>			
7	<p>The study areas identified in Section 26.3 of ES <b>Chapter 26 - Landscape and Visual</b> [APP-112] is appropriate for the assessment.</p> <p>Discussed and agreed in ETG meeting 1, 23/03/2020, reaffirmed at ETG meeting 2 (Part 1 of 2), 21/07/2021, and as part of the pre-Section 42 consultation. See Table 26-1</p>	<p>Natural England has deferred to the local knowledge of the other expert ETG members.</p>	Agreed

ID	The Applicant Position	Natural England Position	Position Summary
	of the ES <b>Chapter 26 - Landscape and Visual</b> [APP-112] for details.		
8	<p>Visuals will be produced from agreed representative viewpoints, in accordance with Landscape Institute Technical Guidance Note 06/19 Visual Representation of Development Proposals, September 2019, Visual Representation of Wind Farms Version 2.2, Scottish Natural Heritage, February 2017.</p> <p>Discussed and agreed in ETG meeting 1, 23/03/2020 and reaffirmed at ETG meeting 2 (Part 1 of 2), 21/07/2021.</p>	<p>Natural England has deferred to the local knowledge of the other expert ETG members.</p>	<p>Agreed</p>
9	<p>Illustrative photomontages showing potential scheme during operation will also be produced.</p> <p>Discussed and agreed in ETG meeting 1, 23/03/2020 and reaffirmed at ETG meeting 2 (Part 1 of 2), 21/07/2021.</p>	<p>Natural England has deferred to the local knowledge of the other expert ETG members.</p>	<p>Agreed</p>
10	<p>It is appropriate that night-time photomontages of the substation are not provided however, assessment of the effects of lighting are included in the LVIA at ES.</p> <p>Discussed and agreed in ETG meeting 1, 23/03/2020 and reaffirmed at ETG meeting 2 (Part 1 of 2), 21/07/2021.</p>	<p>Natural England has deferred to the local knowledge of the other expert ETG members.</p>	<p>Agreed</p>
11	<p>The impact assessment methodologies used for the EIA, as presented in Section 26.4 of ES <b>Chapter 26 - Landscape and Visual</b> [APP-112], provide an appropriate approach to assessing potential impacts of the Projects.</p> <p>Discussed and agreed in ETG meeting 1, 23/03/2020 and reaffirmed at ETG meeting 2 (Part 1 of 2), 21/07/2021.</p>	<p>Natural England has deferred to the local knowledge of the other expert ETG members.</p>	<p>Agreed</p>

ID	The Applicant Position	Natural England Position	Position Summary
12	<p>The assessment of impacts presented are consistent with the agreed assessment methodologies, as detailed in Section 26.6 and 26.4 respectively of ES <b>Chapter 26 - Landscape and Visual</b> [APP-112].</p> <p>Discussed and agreed to in ETG meeting 2 (Part 1 of 2), 21/07/2021.</p>	<p>Natural England has deferred to the local knowledge of the other expert ETG members.</p>	<p>Agreed</p>
13	<p>Section 26.6 of ES <b>Chapter 26 - Landscape and Visual</b> [APP-112] represents a comprehensive list of the potential impacts.</p> <p>ETG meeting 1 (23/03/2020) agreed with the following list of potential impacts with regards to onshore cable corridor including landfall:</p> <ul style="list-style-type: none"> <li>• Temporary effects during construction;</li> <li>• No significant effects during decommissioning;</li> <li>• Effects due to removal and reinstatement of hedgerows and trees; and</li> <li>• Effects during the first few years of operation as re-instated vegetation matures, (Noting that Planning Inspectorate for England and Wales (PINS) scoping opinion states that visual effects from the onshore cable route (including the landfall) during operation are unlikely to be significant and can be scoped out of the assessment, but that landscape effects should be assessed (while planting matures)).</li> </ul> <p>ETG meeting 2 (Part 1 of 2), 21/07/2021 discussed and agreed to the list of potential impacts assessed with</p>	<p>Natural England has deferred to the local knowledge of the other expert ETG members.</p>	<p>Agreed</p>

ID	The Applicant Position	Natural England Position	Position Summary
	<p>regards to the onshore cable corridor (including landfall) and onshore substation, which included:</p> <ul style="list-style-type: none"> <li>• The landscape character areas / types identified and assessed;</li> <li>• The visual receptors identified and assessed; and</li> </ul> <p>The designated landscapes identified and assessed.</p>		
14	<p>The approach to the assessment of effects on residential visual amenity is appropriate as stated in the following summary: Will be assessed for onshore substation only as necessary. Assessment undertaken to identify whether the substation would be sufficiently “oppressive” or “overbearing” that the residential property would be rendered an unattractive place in which to live (consistent with Landscape Institute Technical Guidance Note 2/19, Residential Visual Amenity Assessment (RVAA) 15 March 2019). (Landscape Institute 2019).</p> <p>Discussed and agreed in ETG meeting 1, 23/03/2020 and reaffirmed at ETG meeting 2 (Part 1 of 2), 21/07/2021.</p>	<p>Natural England has deferred to the local knowledge of the other expert ETG members.</p>	<p>Agreed</p>
15	<p>The following approach to the assessment of effects on the documented 'Special Qualities' of the Norfolk Coast AONB within the LVIA is appropriate:</p> <p>The LVIA will assess effects on the Special Qualities of Natural Beauty that underpin the designation of the Norfolk Coast AONB that are relevant to seascape, landscape and visual.</p> <p>Discussed and agreed in ETG meeting 1, 23/03/2020; reaffirmed at ETG meeting 2 (Part 1 of 2), 21/07/2021 and ETG Meeting 3 (Part 2 of 2), 08/02/2022.</p>	<p>Natural England has deferred to the local knowledge of the other expert ETG members.</p>	<p>Agreed</p>

ID	The Applicant Position	Natural England Position	Position Summary
16	<p>The worst-case assumptions presented in the assessment for the development scenarios, as outlined in Table 26-2 of ES <b>Chapter 26 - Landscape and Visual</b> [APP-112] are appropriate.</p> <p>Discussed and agreed in ETG meeting 1, 23/03/2020 and reaffirmed at ETG meeting 2 (Part 1 of 2), 21/07/2021.</p>	<p>Natural England has deferred to the local knowledge of the other expert ETG members.</p>	<p>Agreed</p>
17	<p>Wireframes for impact assessment will present the 'worst case' in accordance with the Rochdale Envelope approach. e.g., they will show the maximum outline development envelope.</p> <p>Discussed and agreed in ETG meeting 1, 23/03/2020 and reaffirmed at ETG meeting 2 (Part 1 of 2), 21/07/2021.</p>	<p>Natural England has deferred to the local knowledge of the other expert ETG members.</p>	<p>Agreed</p>
18	<p>The assessment of cumulative impacts, as detailed in Section 26.7 of ES <b>Chapter 26 - Landscape and Visual</b> [APP-112] is consistent with the agreed methodologies.</p>	<p>Natural England has deferred to the local knowledge of the other expert ETG members.</p>	<p>Agreed</p>
<b>EIA – Project-Alone Assessment Conclusions</b>			
19	<p>The conclusions of the impact assessment as detailed in Section 26.6 of ES <b>Chapter 26 - Landscape and Visual</b> [APP-112] are appropriate and are considered not significant in EIA terms.</p> <p>In accordance with the impact assessment's methodology (see Section 26.4 of ES <b>Chapter 26 - Landscape and Visual</b> [APP-112]), effects which have been assessed to be 'major-moderate' or 'major' are considered significant in EIA terms.</p>	<p>Natural England highlights in our relevant representation: "Appendix H to the Relevant Representations of Natural England Seascape and Landscape Visualisation Impact Assessment" [NE RR-063] under Section 10) LVIA – Landscape Baseline and Assessment [inter alia]:</p> <p><i>"Natural England agrees with the Applicant that direct adverse effects will occur on the NCAONB during the construction phase of the onshore cables works and that during the operational phase</i></p>	<p>Not Agreed – Material Impact</p>

ID	The Applicant Position	Natural England Position	Position Summary
	<p>Significant effects (in EIA terms) have been assessed during construction, operation and decommissioning of the onshore substation on users of a group of PRowS, a permissive bridleway and Gowthorpe Lane which encircle the fields the site lies within and adjacent to.</p> <p>The conclusions of the impact assessment on the remaining landscape and visual receptors identified within the study areas on the onshore cable corridor and substation are appropriate, and assuming the inclusion of embedded mitigation measures, would not be considered significant in EIA terms.</p>	<p><i>no landscape effects will occur from Operation and Maintenance Activities.</i></p> <p><i>However, to achieve this a vital mitigation measure during the construction phase, should both projects be approved, is for the onshore cabling to be installed for both simultaneously and not sequentially. If sequential is progressed then the first project must install the infrastructure for both projects as agreed for the recently consented East Anglia ONE North and East Anglia TWO OWFs, which cable through the Suffolk Coast and Heaths AONB. The former will restrict construction phase impacts to the short term, but the latter would produce medium term impacts on the AONB. The importance of the AONB (a nationally designated landscape with the highest level of planning policy protection) justifies the most effective mitigation being applied i.e., both onshore cabling stages to be completed together and the landscape fully restored as soon as possible.</i></p> <p><i>Natural England advises that close attention is made to the advice of the NCAONB Partnership and relevant local authorities. These local partners have knowledge and understanding of the immediate landscape through which the cable corridor will pass."</i></p> <p>Natural England advises the mitigation (described in the middle paragraph for the onshore cabling to be installed for both projects <u>simultaneously</u> or at the very least the ducts and not sequentially) is</p>	

ID	The Applicant Position	Natural England Position	Position Summary
		pivotal to minimising both impacts to the visual landscape within the AONB and sensitive species and habitats along the entire cable corridor.	
<b>EIA – Cumulative Impact Assessment (CIA) Conclusions</b>			
20	The conclusions of the CIA as details in Section 26.7 of ES <b>Chapter 26 - Landscape and Visual</b> [APP-112] are appropriate and are considered not significant in EIA terms.	Until the above point 19 is addressed we cannot agree the conclusions of the CIA are appropriate and considered not significant in EIA terms.	Not Agreed – material impact
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>			
21	<p>The <b>Outline Landscape Management Plan (Revision B)</b> [document reference 9.18] includes all relevant mitigation measures specified in ES <b>Chapter 26 - Landscape and Visual</b> [APP-112] and is appropriate for managing post construction impacts from Projects on landscape and visual receptors.</p> <p>ETG meeting 2 (Part 1 of 2), 21/07/2021 discussed and agreed that an Outline Landscape Management Plan (OLMP) would be submitted as part of the DCO application. The landscape proposals would aim to minimise potential visual effects as far as possible and create new opportunities for ecological enhancements.</p> <p>ETG meeting 3 (Part 2 of 2), 08/02/2022 confirmed that the landscape proposals, related to the landscape management of the onshore cable corridor and the onshore substation, were broadly acceptable and responded well to the local landscape and its existing framework.</p> <p>The Applicant confirmed its commitment to the following:</p>	<p>The approach to onshore ecology will impact the LMP and therefore we direct you to Point 17, 32 and 33 of the Onshore Ecology SoCG.</p> <p>While Natural England agrees with the landscape proposal described here, we strongly encourage and advise use of an OLEMS combining the EMP and LMP and secured within the DCO, as successfully undertaken for the East Anglia ONE North and TWO projects.</p>	Not Agreed – No material impact



ID	The Applicant Position	Natural England Position	Position Summary
	<ul style="list-style-type: none"> <li>Maintaining planting along the onshore cable corridor for the first 10 years following implementation, before being handed over to landowner.</li> </ul> <p>Planting and habitat creation around the onshore substation would be managed for the operational life of SEP and DEP.</p> <p>The Applicant has discussed combining the OLMP and OEMP with the Local Authorities, the majority of whom have requested that the documents remain separate. On the basis that it will be the relevant local authorities that are responsible for discharging DCO requirements relating to these management plans, the Applicant proposes to keep the documents separate.</p>		
22	<p>A 10-year replacement period for trees, hedgerows, and other vegetation was discussed and agreed during ETG meeting 2 (part 1 of 2), 21/07/2021.</p> <p>The Applicant confirmed at ETG meeting 3 (Part 2 of 2), 08/02/2022 its commitment to maintaining planting along the onshore cable corridor for the first 10 years following implementation, before being handed over to landowner.</p> <p>The Applicant has committed to replacement planting of hedgerow and hedgerow trees and has committed to 10-year monitoring and maintenance period as per Section 1.4.2 of the <a href="#">Outline Landscape Management Plan (Revision B)</a> [document reference 9.18] and paragraph 103 of the <a href="#">Outline Ecological Management Plan (Revision E)</a> [document reference 9.19].</p>	<p>Natural England agrees to the commitment to the replacement planting and 10-year monitoring and maintenance period but would like this detailed within the OLEMS.</p> <p>Please see Onshore Ecology ID17 and ID18 in relation to our position regarding the OLEMS.</p>	Agreed
23	<p>The <a href="#">Outline Ecological Management Plan (Revision E)</a> [document reference 9.19] includes all relevant mitigation</p>	<p>As items 21 and 22 above, while Natural England agrees with the elements of the OLEMP described</p>	Not Agreed – No Material Impact

ID	The Applicant Position	Natural England Position	Position Summary
	<p>measures specified in ES <b>Chapter 26 - Landscape and Visual</b> [APP-112] and is appropriate for managing post construction impacts from Projects on landscape receptors. See ID 21 for the Applicant's position on an OLEMS. ETG meeting 2 (Part 1 of 2), 21/07/2021 discussed and agreed that the Outline Ecological Management Plan (OEMP) would be prepared in conjunction with the OLMP and submitted as part of the DCO application.</p>	<p>here, we strongly encourage and advise use of an OLEMS combining the OEMP and LMP and secured within the DCO, as successfully undertaken for the East Anglia ONE North and TWO projects.</p>	

### 3 Signatures

1. The above Statement of Common Ground is agreed between Equinor New Energy Limited and Natural England on the day specified below.

Signed: *Alan Gibson*

Print Name: Alan Gibson

Job Title: Marine Senior Adviser - Natural England

Date: 17/07/2023

Duly authorised for and on behalf of **Natural England**

Signed: *Helen Mann*

Print Name: Helen Mann

Job Title: Marine Senior Adviser - Natural England

Date: 17/07/2023

Duly authorised for and on behalf of **Natural England**

Signed: 

Print Name: Kari Hege Mørk

Job Title: Project Director

Date: 17/07/2023

Duly authorised for and on behalf of **Equinor New Energy Limited**

## References

Department for Communities and Local Government (2015) Planning Act 2008: Guidance for the examination of applications for development consent. [Online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/418015/examinations\\_guidance-final\\_for\\_publication.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418015/examinations_guidance-final_for_publication.pdf). Accessed 05/07/2022.

Planning Inspectorate (2018) Advice Note 11: Working with Public Bodies, Annex C: Natural England <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/an11-annexc/>

**Annex 1 Agreement Logs**

**Onshore Ecology and Ornithology Agreement Log**

Meetings	Discussion Points	ID	Agreements and Notes	Stakeholders							Outstanding agreements
				NE	EA	RSPB	NWT	NCC	SNC and BDC	NNDC	
<p><b>ETG1</b> 28/01/2020</p>	<p>Scope of ecological survey work (as described in the Scoping Report and summarised in the ETG meeting slides).</p>	<p>1.1</p>	<p>RSPB recommended that breeding bird surveys should be extended beyond June at least until end of July, but possibly into August depending on the species identified. SNC and BDC recommended that static bat detectors are used rather transect surveys. It was agreed that eDNA surveys will be used for great crested newt surveys presence/absence. Some population assessments may be progressed depending on the findings.  The Applicant confirms that all onshore ecology surveys will be undertaken in accordance with industry accepted guidance and considering the points raised by ETG attendees above.</p>	<p>Present</p> <p><b>Agreed (noting the below comment, notably eDNA)</b></p> <p>Natural England has no additional comments to those raised by the other Interested Parties.</p> <p>However, we reflect that for the OLEMS and IPMP with respect to the pre-construction surveys, we wouldn't want the inclusion of transects surveys to be ruled out in order to refine down the required mitigation.</p> <p>eDNA: Natural England notes another project has had difficulty gaining a protected species licence (Letter of no Impediment) reliant solely on eDNA, rather than combined/additional use of conventional survey methods due to issues including: reliability of data (such as false positives), presentation of presence/absence, period of time between surveys and proposed start of development, seasonal timing of surveys. As such it is recommended that guidance available from NE Wildlife Licensing Service is followed if a draft LONI is sought.</p>	<p>Present</p> <p><b>Agreed</b></p>	<p>Present</p> <p><b>Agreed</b></p>	<p>Absent</p> <p><b>NA</b></p>	<p>Present</p> <p><b>Agreed</b></p>	<p>Present</p> <p><b>Agreed</b></p>	<p>Present</p> <p><b>Agreed</b></p>	<p>None</p>

Meetings	Discussion Points	ID	Agreements and Notes	Stakeholders							Outstanding agreements	
				NE	EA	RSPB	NWT	NCC	SNC and BDC	NNDC		
				Subsequent to this ETG, an IAPC has been awarded by the NE Wildlife Licencing Service and 1st Stage payment made by Equinor April May 2022 for the Norfolk and Suffolk District Level Licencing Scheme.								
	Approach to Extended Phase 1 Habitat Survey (as described in the Scoping Report and summarised in the ETG meeting slides).	1.2	<p>SNC and BDC recommended the upcoming hedgerows and trees surveys should also be undertaken in accordance with the Hedgerow Regulations and associated methodology.</p> <p>The Applicant confirms that all surveys of hedgerows will be undertaken in accordance with the Hedgerow Regulations methodology.</p>	<p>Present</p> <p><b>Agreed</b></p> <p>However, Natural England reserves the right to change our advice dependant on the information provided in the ES Application.</p>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>NA</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	None	
	Approach to wintering bird survey approach and the selected target species (as described in the Scoping Report and summarised in the ETG meeting slides).	1.3	<p>RSPB recommended that wintering bird surveys are extended throughout October (pink-footed geese will be arriving, and their presence could influence timing of works). Recommend that two years survey effort would be good, unless additional information that would allow for a continuous run of data to be presented. Data should be available from Hornsea Project Three but appreciate challenge of data sharing.</p> <p>The Applicant confirms and agrees that the scope of the over-wintering surveys will include pink-footed geese. A full suite of over-wintering bird surveys has been undertaken, the findings of which will inform further site selection/route planning</p>	<p>Present</p> <p><b>Agreed</b></p> <p>NE agrees with comments raised by the interested parties in paragraph 1.</p> <p>Natural England will ensure our advice remains aligned with other projects in the area.</p>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>NA</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	None	

Meetings	Discussion Points	ID	Agreements and Notes	Stakeholders							Outstanding agreements
				NE	EA	RSPB	NWT	NCC	SNC and BDC	NNDC	
			process and presented in the PEIR and ES.								
Meetings	Discussion Points	ID	Agreements and Notes	NE	EA	RSPB	NWT	NCC	SNC and BDC	NNDC	Outstanding agreements
ETG 2 10/12/2020	Approach and methodology to over-wintering bird surveys (as described in the PEIR and summarised in the ETG meeting slides).	2.1	ETG did not have comments on the overall survey methodology and agreed to the methodologies that will be followed.	Present <b>Agreed</b> However, Natural England reserves the right to change our advice dependant on the information provided in the ES Application.	Present <b>Agreed</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>NA</b>	Present <b>Agreed</b>	None
	Use of available over-wintering bird survey data from other projects.	2.2	RSPB advised that the results of previous studies that cover the same footprint as SEP and DEP should be considered where possible and available to understand the usage of the relevant fields over a longer period of time.  The applicant and ETG agreed that where other data sets were available these will be obtained and reviewed to inform the conclusions presented in the PEIR.	Present <b>Agreed</b> However, Natural England reserves the right to change our advice dependant on the information provided in the ES Application.	Present <b>Agreed</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>NA</b>	Present <b>Agreed</b>	None
	Approach and methodology to breeding bird surveys (as described in the PEIR and summarised in the ETG meeting slides).	2.3	Survey approach using extrapolation would be acceptable for arable habitats and associated species (given the wide extent of this habitat and anticipated access restrictions, full survey coverage will be difficult to achieve). The approach would involve surveying a selection of representative sites across the DCO boundary, from which it would be possible to extrapolate likely levels	Present <b>Agreed</b> Natural England advises this approach is fine for the ES application, but the approach for management of nesting breeding birds, will need to be included in the OLEMS to	Present <b>Agreed</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>NA</b>	Present <b>Agreed</b>	None

Meetings	Discussion Points	ID	Agreements and Notes	Stakeholders							Outstanding agreements	
				NE	EA	RSPB	NWT	NCC	SNC and BDC	NNDC		
			<p>of bird nesting throughout the rest of the un-surveyed arable habitats.</p> <p>ETG agreed with approach presented to them, as outlined above.</p>	<p>be taken forwards for pre-construction.</p>								
	Approach and methodology to great crested newt surveys (as described in the PEIR and summarised in the ETG meeting slides).	2.4	<p>The survey involved Habitat Suitability Index appraisal and eDNA survey of ponds within the PEIR boundary and surrounding 250m.</p> <p>ETG did not have comments on the overall survey methodology and therefore agreed to the approach taken.</p>	<p>Present</p> <p><b>Agreed</b></p> <p>(See above comment Item 1.1 regarding eDNA)</p>	<p>Present</p> <p><b>Agreed</b></p>	<p>Present</p> <p><b>Agreed</b></p>	<p>Present</p> <p><b>Agreed</b></p>	<p>Present</p> <p><b>Agreed</b></p>	<p>Absent</p> <p><b>NA</b></p>	<p>Present</p> <p><b>Agreed</b></p>	<p>None</p>	
	Approach and methodology to bat surveys (as described in the PEIR and summarised in the ETG meeting slides).	2.5	<p>ETG raised similar points to those raised for breeding birds – i.e., extrapolation of data needs to ensure sufficient number of sites are considered which are considered representative of the whole route.</p> <p>ETG also questioned if there is a scope to avoid trees as part of the site selection and route refinement process. Agreed that the findings from surveys undertaken to date will be used to inform any future site selection and/or route refinement process. The applicant advised that there are no buildings that require demolition and therefore trees will be the sole focus of the future survey requirements for roosting bats. The ETG agreed with this approach.</p>	<p>Present</p> <p><b>Agreed</b></p> <p>Natural England is in agreement with the comments raised by other interested parties.</p>	<p>Present</p> <p><b>Agreed</b></p>	<p>Present</p> <p><b>Agreed</b></p>	<p>Present</p> <p><b>Agreed</b></p>	<p>Present</p> <p><b>Agreed</b></p>	<p>Absent</p> <p><b>NA</b></p>	<p>Present</p> <p><b>Agreed</b></p>	<p>None</p>	
	Preliminary findings from Extended Phase 1 Habitat Survey.	2.6	<p>ETG was presented with a summary of the Extended Phase 1 Habitat Survey findings obtained to date. ETG advised that the majority of the PEIR boundary passes through</p>	<p>Present</p> <p><b>Agreed</b></p>	<p>Present</p> <p><b>Agreed</b></p>	<p>Present</p> <p><b>Agreed</b></p>	<p>Present</p> <p><b>Agreed</b></p>	<p>Present</p> <p><b>Agreed</b></p>	<p>Absent</p> <p><b>NA</b></p>	<p>Present</p> <p><b>Agreed</b></p>	<p>None</p>	



Meetings	Discussion Points	ID	Agreements and Notes	Stakeholders							Outstanding agreements	
				NE	EA	RSPB	NWT	NCC	SNC and BDC	NNDC		
			<p>arable land with most field boundaries marked by hedgerows, often with trees.</p> <p>RSPB advised that scrub habitat is important and therefore should be retained as much as possible as it can support various invertebrate and bird species. RSPB requested that areas of scrub should be mapped and potentially considered for biodiversity net gain opportunities.</p> <p>The Applicant agreed with these points and advised that opportunities for biodiversity net gain are being considered throughout the project.</p>	Natural England agrees with the points raised by other Interested Parties.								
	Biodiversity Net Gain opportunities.	2.7	<p>The Applicant advised that biodiversity net gain data has been collected during the Extended Phase 1 Habitat Survey and that the Project has committed to achieve a net gain, the ETG has an opportunity to inform and contribute towards the development of these opportunities.</p> <p>The Environment Agency advised that tree planting should be considered alongside watercourse crossed by the Projects.</p> <p>Norfolk Wildlife Trust suggested focusing on the important landscape areas and addressing landscape restoration targets, using NWT Landscape approach.</p> <p>RSPB suggested cooperation with the Upper Wensum focus area turtle dove project.</p> <p>Wider ETG advised that other large schemes in the same region should</p>	<p>Present</p> <p><b>Agreed</b></p> <p>Please note, Natural England raised BNG at the ETG1 meeting and we welcome this consideration.</p> <p>We look forward to more detailed discussions at the ETG proposed on the 30<sup>th</sup> June. Therefore, we reserve the right to update on this.</p>	Present <b>Agreed</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>NA</b>	Present <b>Agreed</b>	None	

Meetings	Discussion Points	ID	Agreements and Notes	Stakeholders							Outstanding agreements
				NE	EA	RSPB	NWT	NCC	SNC and BDC	NNDC	
			be reviewed to ensure biodiversity net gain approaches align and to not conflict with each other. The A47 road improvement works near Honingham/Easton and the Easton Growth Point were specifically mentioned.								
	Approach to data gaps.	2.8	The ETG discussed how to assess the areas where there is no access, and it was agreed that NBIS data will be used to fill in the gaps.	Present  <b>Agreed</b>  Natural England highlights there may be other data sources, for example such as Wild Wings Ecology. We recommend contacting Wild Wings Ecology.  Badger records could be obtained from the local badger recorder and reasonable effort should be made to gain landowner access where possible.	Present  <b>Agreed</b>	Present  <b>Agreed</b>	Present  <b>Agreed</b>	Present  <b>Agreed</b>	Absent  <b>NA</b>	Present  <b>Agreed</b>	None
Meetings	Discussion Points	ID	Agreements and Notes	NE	EA	RSPB	NWT	NCC	SNC and BDC	NNDC	Outstanding agreements
<b>ETG 3</b> 01/07/2021	Update on survey results obtained to date and since last ETG meeting.	3.1	ETG was provided with an update on the survey results obtained to date and since the last ETG meeting. The Applicant advised that surveys remain ongoing due to landowner access continually being sought. The Applicant informed the ETG that all surveys to date have been undertaken with the industry agreed methodologies, as presented at earlier ETG meetings.	Present  <b>Agreed</b>	Present  <b>Agreed</b>	Absent  <b>NA</b>	Present  <b>Agreed</b>	Present  <b>Agreed</b>	Absent  <b>NA</b>	Present  <b>Agreed</b>	None

Meetings	Discussion Points	ID	Agreements and Notes	Stakeholders							Outstanding agreements
				NE	EA	RSPB	NWT	NCC	SNC and BDC	NNDC	
			<p>RSPB raised for clarification on how data gaps will be filled should landowner access from the larger estate owners not be obtained. The Applicant advised that progress has been made regarding access and that engagement with estates and landowners remains ongoing. The intention is that all land requiring surveying will be accessed; however, where this is not possible NBIS Living Map Data will be used to inform these areas.</p> <p>ETG agreed with approach and efforts being made in respect to obtaining landowner access.</p>								
	Bat survey data from other projects	3.2	<p>Norfolk Wildlife Trust highlighted that the Western Link project overlaps with the survey efforts of the Barbastelle survey group. The Applicant advised that survey data from this group has been requested but not yet been received.</p> <p>ETG agreed that efforts have been made and should the data be available this will be used to support the conclusions presented in the ES.</p>	<p>Present</p> <p><b>Agreed</b></p> <p>Please see our comment on Item 2.8 above regarding other available survey data.</p>	<p>Present</p> <p><b>Agreed</b></p>	<p>Absent</p> <p><b>NA</b></p>	<p>Present</p> <p><b>Agreed</b></p>	<p>Present</p> <p><b>Agreed</b></p>	<p>Absent</p> <p><b>NA</b></p>	<p>Present</p> <p><b>Agreed</b></p>	None
	Deployment of static bat detectors	3.3	<p>The Applicant advised that the static bat detectors that have been deployed have been set to be in full spectrum mode and therefore enabling bats to be identified to species level.</p> <p>ETG agreed with approach taken.</p>	<p>Present</p> <p><b>Agreed</b></p> <p>While Natural England agrees with the approach being taken, we advise that static bat detectors may not be able to identify all bats to species level.</p>	<p>Present</p> <p><b>Agreed</b></p>	<p>Absent</p> <p><b>NA</b></p>	<p>Present</p> <p><b>Agreed</b></p>	<p>Present</p> <p><b>Agreed</b></p>	<p>Absent</p> <p><b>NA</b></p>	<p>Present</p> <p><b>Agreed</b></p>	None

Meetings	Discussion Points	ID	Agreements and Notes	Stakeholders							Outstanding agreements	
				NE	EA	RSPB	NWT	NCC	SNC and BDC	NNDC		
				<p>In addition, some species may be missed, for example due to species not calling.</p> <p>Natural England advises static detector surveys will provide an overview of the species present in the area but the limitations to survey results must be stated within the ES Application and considered when assessing the potential impacts of the development.</p>								
	Letter of No Impediment (LoNI).	3.4	<p>Natural England advised that sufficient level of survey information will be required for those species recorded within the SEP and DEP footprint and for which may require a LoNI to be sought.</p> <p>The Applicant agreed with requirements and will be seeking LoNI for bats and badgers. It is proposed that a GCN DLL application will be sought for GCNs.</p> <p>ETG confirmed with conclusions and those species seeking a LoNI.</p>	<p>Present</p> <p><b>Agreed</b></p> <p>Natural England agrees a draft LONI is required for bats and badgers.</p> <p>We confirm the draft LONI application for bats and badger will be reviewed in due course.</p> <p>For GCN, an IAPC has been awarded by the NE Wildlife Licencing Service and 1st Stage payment made by Equinor April and May 2022 for the Norfolk and Suffolk District Level Licencing Scheme.</p>	Present <b>Agreed</b>	Absent <b>NA</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>NA</b>	Present <b>Agreed</b>	None	
	Habitat improvements and biodiversity net gain.	3.5	<p>Norfolk Wildlife Trust advised that the lead in times for the habitat restoration and improvement opportunities are important. Preference for genuine local</p>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>NA</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>NA</b>	Present <b>Agreed</b>	None	

Meetings	Discussion Points	ID	Agreements and Notes	Stakeholders							Outstanding agreements	
				NE	EA	RSPB	NWT	NCC	SNC and BDC	NNDC		
			<p>provenance seeds and plants. Norfolk Wildlife Trust advised that they have capacity and experience of delivering habitat restoration schemes locally and therefore are happy to share this with the Applicant.</p> <p>Natural England confirmed that they would not expect or require monitoring of arable field margins.</p> <p>Norfolk County Council suggested that opportunities may be available of reinstating ghost ponds and advised the Applicant to contact Norfolk Ponds Project.</p> <p>NB further meeting to be held to discuss biodiversity net gain.</p>	<p>Please note, Natural England's comment is anomalous to this item.</p> <p>Please note Natural England's comment to item 2.7 BNG above.</p>								
	Bat boxes.	3.6	<p>Norfolk Wildlife Trust advised that it is the Applicant's decision to determine and ensure that no adverse effect to bats would occur; however, advised that the provision of bat boxes should not be solely relied on as mitigation. Therefore, avoidance of impact to roosting bats would be preferred. However, where bat boxes are proposed consideration should be made to using the KENT bat boxes as these are self-cleaning.</p> <p>This has been acknowledged by the Applicant and will be considered.</p>	<p>Present</p> <p><b>Agreed</b></p> <p>Natural England agrees with the points raised by the other IP's.</p> <p>Although we wouldn't be descriptive on the type of boxes used., Natural England would welcome further consideration as part of OLEMS.</p> <p>We look forward to reviewing to how impacts will be avoided, reduced and mitigated for the as part of our review of the OLEMS, submitted with the application.</p>	Present <b>Agreed</b>	Absent <b>NA</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>NA</b>	Present <b>Agreed</b>	None	

Meetings	Discussion Points	ID	Agreements and Notes	Stakeholders							Outstanding agreements
				NE	EA	RSPB	NWT	NCC	SNC and BDC	NNDC	
	CEA approach.	3.7	<p>Norfolk County Council advised that the Anglian Water project, which comprises a 13km pipeline overlaps with the SEP and DEP onshore cable route.</p> <p>The Applicant acknowledges this and confirms that all projects and plans will be identified and considered in the CEA that will be presented in the ES, whilst noting that only those projects/plans with publicly available information will be included.</p>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>NA</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>NA</b>	Present <b>Agreed</b>	None
	Approach to white clawed crayfish surveys.	3.8	<p>Natural England advised that in the event of a bentonite breakout during HDD activities, survey information relating to white clawed crayfish would be important to establish areas of sensitivity and impacts. Therefore, following this raised matter, the Applicant decided to complete eDNA surveys for white clawed crayfish prior to submission of the DCO Application. The findings of which will be presented in the ES.</p>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>NA</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>NA</b>	Present <b>Agreed</b>	None
	Fish surveys.	3.9	<p>Natural England advised that the Applicant should obtain fish data from the Environment Agency.</p> <p>It was agreed that no baseline fish surveys will be undertaken by the Applicant.</p>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>NA</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>NA</b>	Present <b>Agreed</b>	None
	Inclusion of protected species within the water crossing method statement.	3.10	<p>Natural England confirmed that an outline water crossing method statement should be included as part of the DCO application.</p>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>NA</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>NA</b>	Present <b>Agreed</b>	None

Meetings	Discussion Points	ID	Agreements and Notes	Stakeholders							Outstanding agreements	
				NE	EA	RSPB	NWT	NCC	SNC and BDC	NNDC		
			Agreed that protected species will be included within water crossing method statement.									
	Approach to and requirement of outline management plans.	3.11	<p>Natural England confirmed any plans suggested to be completed post consent will require draft/outline plan at submission including pink-footed geese and invasive non-native species (INNS).</p> <p>The Applicant confirms that Outline mitigation /protocols with regard to pink footed geese and INNS will be provided in the OEMP.</p>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>NA</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>NA</b>	Present <b>Agreed</b>	None	
	Approach to data gaps.	3.12	<p>Natural England confirmed that gaps in survey data need to be infilled wherever possible (and landowner permission is granted) to ensure the predicted impacts on ecological receptors are as accurate as possible.</p> <p>The Applicant confirmed that where access has not been granted, this will be acknowledged in the ES and considerations of its implications clearly presented.</p>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>NA</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>NA</b>	Present <b>Agreed</b>	None	
	eDNA surveys.	3.13	<p>Natural England advised that the Applicant should not rely overly on eDNA survey efforts and their results, and therefore should also undertake further surveys post-consent.</p> <p>The Applicant confirms that a suite of post-consent and pre-construction surveys will be undertaken, and these will be presented (and secured) via the OEMP.</p>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>NA</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>NA</b>	Present <b>Agreed</b>	None	

Meetings	Discussion Points	ID	Agreements and Notes	Stakeholders							Outstanding agreements
				NE	EA	RSPB	NWT	NCC	SNC and BDC	NNDC	
	Monitoring and replanting.	3.14	<p>NNDC and SNC and BDC consider that 10-year commitment to monitoring and replanting of trees and hedgerows is appropriate and aligns with the commitments of other similar projects.</p> <p>The Applicant confirms its commitment to 10-year monitoring and replanting of trees and hedgerows.</p>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>NA</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>NA</b>	Present <b>Agreed</b>	None
Meetings	Discussion Points	ID	Agreements and Notes	NE	EA	RSPB	NWT	NCC	SNC and BDC	NNDC	Outstanding agreements
ETG 4 30/07/22	Approach taken for the initial Biodiversity Net Gain (BNG) assessment.	4.1	<p>c.10% of the Development Consent Order (DCO) order limits had not been surveyed at the time of writing the initial BNG assessment.</p> <p>The Application confirmed that these areas would be surveyed pre-construction and the updated information included into a more advanced and complete BNG assessment at that time.</p>	Present <b>Agreed</b>	Absent <b>NA</b>	Absent <b>NA</b>	Absent <b>NA</b>	Absent <b>NA</b>	Absent <b>NA</b>	Absent <b>NA</b>	None
	Approach taken for the initial BNG enhancement options.	4.2	<p>NE agreed that the basic proposals for habitat reinstatement, hedgerow planting, landscaping around the substation etc. would be acceptable. No specific suggestions were put forward by NE for alterations to the approach or additions/changes to the enhancements.</p>	Present <b>Agreed</b>	Absent <b>NA</b>	Absent <b>NA</b>	Absent <b>NA</b>	Absent <b>NA</b>	Absent <b>NA</b>	Absent <b>NA</b>	None



**SLVIA Agreement Log**

Meetings	Discussion Points	ID	Agreements and Notes	Stakeholders							Outstanding agreements	Project Response
				NE	HE	NCC	NNDC	SNC BDC	NorCC	Norfolk Coast Partnership		
ETG 1 23/03/2020	Seascape: approach to visualisation.	1.1	Expert Topic Group (ETG) agreed the following approach to visuals: Visuals will be produced from agreed representative viewpoints, in accordance with: Landscape Institute Technical Guidance Note 06/19 Visual Representation of Development Proposals, September 2019 and Visual Representation of Wind Farms Version 2.2, Scottish Natural Heritage, February 2017.	Present Agreed	Absent TBC	Absent TBC	Present Agreed	Absent NA	Absent TBC	Absent TBC	None	N/A
		1.2	Wireframes for impact assessment will present the 'worst case' in accordance with the Rochdale Envelope approach. E.g., they will show the maximum outline development envelope.	Present Agreed	Absent TBC	Absent TBC	Present Agreed	Absent NA	Absent TBC	Absent TBC	None	N/A
		1.3	Illustrative photomontages showing the proposed SEP and DEP projects during operation will also be produced showing: The offshore wind turbine array with the largest potential turbines (from land - daytime), and Night-time photomontages of the offshore wind turbine array from selected land-based viewpoints to illustrate lighting.	Present Agreed	Absent TBC	Absent TBC	Present Agreed	Absent NA	Absent TBC	Absent TBC	None	N/A
	Seascape: approach to visual receptors.	1.4	ETG agreed the following list of visual receptors for SVIA: Marine: ferry routes, recreational vessels, fishing boats. Land: England Coast Path / Norfolk Coast Path, beach / coastal margin and other accessible landscapes, coastal settlements, specific viewpoints.	Present Agreed	Absent TBC	Absent TBC	Present Agreed	Absent NA	Absent TBC	Absent TBC	None	N/A
	Seascape: list of data sources.	1.5	ETG agreed with the following list of data sources: 'Seascape character area assessment East Inshore and East Offshore marine plan areas', Marine Management Organisation 2012; Historic Seascape Characterisation East Yorkshire to Norfolk Section, University of Newcastle unpublished report for English Heritage 2013; Admiralty charts; Recorded visibility data Met Office; 'Norfolk Coast Area of Outstanding Natural Beauty 2019-24 Management Plan', Norfolk Coast Partnership; and 'Norfolk Coast Area of Outstanding Natural Beauty (AONB) Integrated Landscape Character Guidance', Norfolk Coast Partnership.	Present Agreed	Absent TBC	Absent TBC	Present Agreed	Absent NA	Absent TBC	Absent TBC	None	N/A

Meetings	Discussion Points	ID	Agreements and Notes	Stakeholders							Outstanding agreements	Project Response
				NE	HE	NCC	NNDC	SNC BDC	NorCC	Norfolk Coast Partnership		
	Seascape: seascape character areas to be included in assessment.	1.6	The ETG agreed that the Seascape character area assessment East Inshore and East Offshore marine plan areas, Marine Management Organisation 2012 should be used as the baseline for assessing seascape effects, informed by other documents and site assessment.	Present Agreed	Absent TBC	Absent TBC	Present Agreed	Absent NA	Absent TBC	Absent TBC	None	N/A
	Seascape: list of potential impacts.	1.7	The ETG agreed with the following list of potential impacts: Temporary impacts during construction and decommissioning, long term impacts during operation, Effects on seascape character, Effects on landscape character where offshore elements would be visible from land, Effects on visual receptors sea based and land based, Effects on designated landscapes Norfolk Coast AONB, North Norfolk Heritage Coast and, potentially, the Norfolk Broads, National Park.	Present Agreed	Absent TBC	Absent TBC	Present Agreed	Absent NA	Absent TBC	Absent TBC	None	N/A
	Landscape: approach to visualisation.	1.8	ETG agreed the following approach to visuals: Visuals will be produced from agreed representative viewpoints, in accordance with: Landscape Institute Technical Guidance Note 06/19 Visual Representation of Development Proposals, September 2019, Visual Representation of Wind Farms Version 2.2, Scottish Natural Heritage, February 2017.	Present Agreed	Absent TBC	Absent TBC	Present Agreed	Present Agreed	Present Agreed	Absent TBC	None	N/A
		1.9	Wireframes for impact assessment will present the 'worst case' in accordance with the Rochdale Envelope approach. e.g., they will show the maximum outline development envelope.	Present Agreed	Absent TBC	Absent TBC	Present Agreed	Present Agreed	Present Agreed	Absent TBC	None	N/A
		1.10	Illustrative photomontages showing potential scheme during operation will also be produced.	Present Agreed	Absent TBC	Absent TBC	Present Agreed	Present Agreed	Present Agreed	Absent TBC	None	
	Landscape: list of data sources.	1.11	ETG agreed with the following list of data sources: National Landscape Character Area Profiles, 'North Norfolk Landscape Character Assessment' DRAFT Supplementary Planning Document 2018; 'North Norfolk Landscape Sensitivity Assessment' DRAFT Supplementary Planning Document 2018; 'Broadland District Landscape Character Assessment' 2008 (updated 2013); 'South Norfolk District Landscape Character Assessment' 2001 (updated 2006 and 2008); 'South Norfolk District Landscape Designations Review' 2012;	Present Agreed	Absent TBC	Absent TBC	Present Agreed	Present Agreed	Present Agreed	Absent TBC	None	N/A

Meetings	Discussion Points	ID	Agreements and Notes	Stakeholders							Outstanding agreements	Project Response
				NE	HE	NCC	NNDC	SNC BDC	NorCC	Norfolk Coast Partnership		
			'Norfolk Coast Area of Outstanding Natural Beauty 2019-24 Management Plan', Norfolk Coast Partnership; and 'Norfolk Coast AONB Integrated Landscape Character Guidance', Norfolk Coast Partnership.									
	Landscape: landscape character areas to be included in assessment.	1.12	The ETG agreed that the North Norfolk, Broadland and South Norfolk district landscape character assessments should be used as the baseline for assessing landscape effects, informed by other reports and assessments.	Present Agreed	Absent TBC	Absent TBC	Present Agreed	Present Agreed	Present Agreed	Absent TBC	None	N/A
	Landscape: approach to visual receptors.	1.13	The ETG agreed with the following list of visual receptors for assessing visual effects: Settlements, Public Rights of Way, Beach / coastal margin and other accessible landscapes, Key routes road and rail, Key routes recreational (long distance walking routes, cycle routes), Specific viewpoints.	Present Agreed	Absent TBC	Absent TBC	Present Agreed	Present Agreed	Present Agreed	Absent TBC	None	N/A
	Landscape: key landscape designation and features.	1.14	ETG agreed with the following list of landscape designations and areas or features protected by policy for consideration with regard to onshore landscape and visual impact assessment. Norfolk Coast AONB. Rural River Valleys and Valley Urban Fringe landscape character types (South Norfolk Local Plan DMPD Policy DM 4.5). Norwich Southern Bypass Landscape Protection Zone (NSBLPZ), Key Viewing Cones and Undeveloped Approaches to Norwich (South Norfolk Local Plan DMPD Policy DM 4.6).	Present Agreed	Absent TBC	Absent TBC	Present Agreed	Present Agreed	Present Agreed	Absent TBC	None	N/A
	Landscape: List of potential impacts.	1.15	The ETG agreed with the following list of potential impacts with regard to onshore cable corridor including landfall. Temporary effects during construction, No significant effects during decommissioning, Effects due to removal and re-instatement of hedgerows and trees, Effects during the first few years of operation as re-instated vegetation matures, (Noting that Planning Inspectorate for England and Wales (PINS) scoping opinion states that that visual effects from the onshore cable route (including the landfall) during operation are unlikely to be significant and can be scoped out of the assessment, but that landscape effects should be assessed (while planting matures)).	Present Agreed	Absent TBC	Absent TBC	Present Agreed	Present Agreed	Present Agreed	Absent TBC	None	N/A

Meetings	Discussion Points	ID	Agreements and Notes	Stakeholders							Outstanding agreements	Project Response
				NE	HE	NCC	NNDC	SNC BDC	NorCC	Norfolk Coast Partnership		
	Landscape: approach to the assessment of visual amenity.	1.16	ETG agreed with the approach to the assessment of effects on residential visual amenity as the following summary: Will be assessed for onshore substation only as necessary. Assessment undertaken to identify whether the substation would be sufficiently “oppressive” or “overbearing” that the residential property would be rendered an unattractive place in which to live (consistent with Landscape Institute Technical Guidance Note 2/19, Residential Visual Amenity Assessment (RVAA) 15 March 2019). (Landscape Institute 2019).	Present Agreed	Absent TBC	Absent TBC	Present Agreed	Present Agreed	Present Agreed	Absent TBC	None	N/A
	Landscape: assessment of effects on the AONB.	1.17	ETG agreed with the following approach to the assessment of effects on the documented 'Special Qualities' of the Norfolk Coast AONB within the LVIA. The LVIA will assess effects on the Special Qualities of Natural Beauty that underpin the designation of the Norfolk Coast AONB that are relevant to seascape, landscape and visual.	Present Agreed	Absent TBC	Absent TBC	Present Agreed	Present Agreed	Present Agreed	Absent TBC	None	N/A
ETG2 (Part 1 of 2) 21/07/2021	Seascape: as presented in Preliminary Environmental Impact Report (PEIR) Chapter 27.	2.1	It was confirmed that the ETG agreed with the following, as presented in PEIR Chapter 27: The data sources (i.e. character assessment, SPDs and Management Plans) used for the SVIA; the seascape, landscape character areas / types identified and assessed in the SVIA; the visual receptors identified and assessed in the SVIA; the designated landscapes identified and assessed in the SVIA; the list of potential impacts assessed for the offshore development; the approach to the assessment of effects on the 'Special Qualities of Natural Beauty of the Norfolk Coast AONB within the LVIA; the proposed approach to the visualisations. ETG members had no comment on the points raised.	Present Agreed	Absent TBC	Present Agreed	Present Agreed	Absent NA	Absent TBC	Absent TBC	None	N/A
	Seascape: baseline.	2.2	Confirmed that the existing Dudgeon windfarms would form part of the baseline assessed against. ETG agreed the importance of following the most recent guidance and to learn from these previous examples (including Dudgeon). Referenced recently published reports by White Associates - which compared predicted and actual visual impacts of windfarms off the Welsh Coast. This research was considered important in	Present Agreed	Absent TBC	Present Agreed	Present Agreed	Absent NA	Absent TBC	Absent TBC	None	N/A

Meetings	Discussion Points	ID	Agreements and Notes	Stakeholders							Outstanding agreements	Project Response
				NE	HE	NCC	NNDC	SNC BDC	NorCC	Norfolk Coast Partnership		
			calibrating professional judgement when undertaking the assessments of the project, along with experience of other developments, including Dudgeon.									
	Seascape: dark skies character.	2.3	Agreed with the ETG that in relation to the windfarm extensions and potential impacts to dark skies character of North Norfolk, night-time photomontages from three viewpoints would be included.	Present Agreed	Absent TBC	Present Agreed	Present Agreed	Absent NA	Absent TBC	Absent TBC	None	N/A
	Seascape: worst case scenario.	2.4	ETG agreed with the worst-case scenario presented at PEIR, which was considered to be fewer larger turbines. The maximum height parameter was confirmed as 325m (26MW).	Present Agreed	Absent TBC	Present Agreed	Present Agreed	Absent NA	Absent TBC	Absent TBC	None	N/A
	Seascape: assessment methodology.	2.5	ETG agreed with the suitability of the methodology for assessing the effect on the AONB and Heritage Coast.	Present Agreed	Absent TBC	Present Agreed	Present Agreed	Absent NA	Absent TBC	Absent TBC	None	N/A
	Seascape: impact significance.	2.6	Confirmed that NE disagreed in the significance of effect for 4 LCTs. ETG agreed that the assessments were adequate, and were not being challenged; however, the conclusions of the assessment and the judgement of significance differed. Considered that this was a result of differing professional judgements. NE's position is that they consider there to be a potential significant impact to the special qualities of the AONB.	Present Agreed	Absent TBC	Present Agreed	Present Agreed	Absent NA	Absent TBC	Absent TBC	None	N/A
	Landscape: as presented in PEIR Chapter 28.	2.7	Provided a review of previous consultation, agreements, and project responses (see attached, slides 25-32). It was confirmed that the ETG agreed with the following as presented in the PEIR Chapter 28: The methodological approach to the LVIA; the data sources (i.e. character assessment, SPDs and Management Plans) used for the LVIA; the landscape character areas / types identified and assessed in the LVIA; the visual receptors identified and assessed in the LVIA; the designated landscapes identified and assessed in the LVIA; the list of potential impacts assessed with regards to the onshore cable corridor (including landfall) and onshore substation; the approach to the assessment of effects on residential visual amenity; the approach to the assessment of effects on the Special Qualities of Natural Beauty of the AONB within the LVIA; and, the proposed approach to the visualisations.	Present Agreed	Absent TBC	Present Agreed	Present Agreed	Absent NA	Absent TBC	Absent TBC	None	N/A

Meetings	Discussion Points	ID	Agreements and Notes	Stakeholders							Outstanding agreements	Project Response
				NE	HE	NCC	NNDC	SNC BDC	NorCC	Norfolk Coast Partnership		
	Landscape: OLEMP.	2.8	Agreed that an outline Landscape Management Plan (OLMP) would be submitted as part of the DCO application. The landscape proposals would aim to minimise potential visual effects as far as possible and create new opportunities for ecological enhancements.	Present <b>Agreed</b>	Absent <b>TBC</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>NA</b>	Absent <b>TBC</b>	Absent <b>TBC</b>	None	N/A
	Landscape: 10-year replanting period.	2.9	10-year replacement period for trees, hedgerows, and other vegetation requested by the ETG.	Present <b>Agreed</b>	Absent <b>TBC</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>NA</b>	Absent <b>TBC</b>	Absent <b>TBC</b>	None	N/A
<b>ETG2 (Part 2 of 2)</b> 28/07/2021	Landscape: as presented in PEIR Chapter 28.	2.10	Confirmed that the ETG agreed with the following: The methodological approach to the LVIA; the data sources (i.e., character assessment, SPDs and Management Plans) used for the LVIA; the landscape character areas / types identified and assessed in the LVIA; the visual receptors identified and assessed in the LVIA; the designated landscapes identified and assessed in the LVIA; the list of potential impacts assessed for the onshore developments in the LVIA.	Absent <b>TBC</b>	Absent <b>TBC</b>	Absent <b>TBC</b>	Absent <b>TBC</b>	Present <b>Agreed</b>	Absent <b>TBC</b>	Absent <b>TBC</b>	None	N/A
	Landscape: visual receptors identified and assessed in the LVIA.	2.11	There had not been any formal comment from South Norfolk District Council (SNDC) or Broadland District Council) on the viewpoints taken forward in the PEIR assessment. There would not be sufficient time in the programme to include additional viewpoint photography, and that the viewpoint information presented at the PEIR covered what is considered necessary to produce a robust assessment.	Absent <b>TBC</b>	Absent <b>TBC</b>	Absent <b>TBC</b>	Absent <b>TBC</b>	Present <b>Agreed</b>	Absent <b>TBC</b>	Absent <b>TBC</b>	None	N/A
	Landscape: assessment of the effects of lighting.	2.12	Confirmed that night-time photomontages of the substation would not be provided; however, assessment of the effects of lighting would be included in the LVIA at ES.	Absent <b>TBC</b>	Absent <b>TBC</b>	Absent <b>TBC</b>	Absent <b>TBC</b>	Present <b>Agreed</b>	Absent <b>TBC</b>	Absent <b>TBC</b>	None	N/A
<b>ETG 3 (Part 1 of 2)</b> 02/02/2022	Seascape: SVIA.	3.1	The ETG agreed that it would be helpful to pre-empt the examiner's potential request with regard to the comparison with SEP and DEP and other existing windfarms and draft a description and comparison between existing and proposed schemes for discussion and agreement with NE in advance of the DCO submission. Equinor agreed to prepare this text and share with NE.	Present <b>Agreed</b>	Absent <b>TBC</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>TBC</b>	Absent <b>TBC</b>	None	N/A
	Seascape: SVIA.	3.2	In response to the outstanding action at Minute Item 24 from the previous ETG meeting on 21st July 2021, NE confirmed its agreement that 4 of the 7	Present <b>Agreed</b>	Absent <b>TBC</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	Present <b>Agreed</b>	Absent <b>TBC</b>	Absent <b>TBC</b>	None	N/A

Meetings	Discussion Points	ID	Agreements and Notes	Stakeholders							Outstanding agreements	Project Response
				NE	HE	NCC	NNDC	SNC BDC	NorCC	Norfolk Coast Partnership		
			LCTs assessed in the PEIR SVIA chapter can be scoped out of the assessment.									
	Seascape: SVIA.	3.3	<p>The ETG welcomed and agreed to the updates proposed for the next ES SVIA Chapter, which would take into account the following:</p> <ul style="list-style-type: none"> <li>• Refinement of project proposals;</li> <li>• Section 42 comments from consultees; and</li> <li>• Susceptibility and sensitivity of users of long-distance walking routes, PRoWs, accessible and recreational landscapes, valued viewpoints and Dark Sky Discovery Sites within designated landscapes changed to high.</li> </ul>	Present Agreed	Absent TBC	Present Agreed	Present Agreed	Present Agreed	Absent TBC	Absent TBC	None	N/A
	Seascape: SVIA.	3.4	The ETG agreed with the decision to use ground level viewpoint and historic photography from the Sheringham Shoal offshore wind farm SLVIA within the ES SVIA Chapter be referred to in reaching judgements on effects on visitors to the viewing gazebo at Oak Wood. It was explained that the viewing gazebo at the National Trust Oak Wood is presently inaccessible, and the National Trust agrees to the SVIA's proposed approach.	Present Agreed	Absent TBC	Present Agreed	Present Agreed	Present Agreed	Absent TBC	Absent TBC	None	N/A
	Seascape: Assessment of the Norfolk Coast AONB.	3.5	The ETG welcomed and agreed to the presentation of the assessments of the Norfolk Coast AONB from all relevant topics in a sperate document. NE suggest undertaking a gap analysis between the two management plans – Equinor agreed to review and request clarity on the timings of each management plans directly from the Norfolk cost Partnership.	Present Agreed	Absent TBC	Present Agreed	Present Agreed	Present Agreed	Absent TBC	Absent TBC	None	It was confirmed by the Norfolk Coast Partnership (via email on 23 February 2022) that the 'Norfolk Coast Area of Outstanding Natural Beauty Five Year Strategy 2019-2024' remains the current management plan for the Norfolk Coast AONB, and as

Meetings	Discussion Points	ID	Agreements and Notes	Stakeholders							Outstanding agreements	Project Response
				NE	HE	NCC	NNDC	SNC BDC	NorCC	Norfolk Coast Partnership		
												used to inform the SVIA.
	Seascope: SVIA.	3.6	The ETG agreed that the realistic worst case turbine layout presented will be assessed in the SVIA, and recognised the on-going work that has been undertaken since the PEIR / consultation responses to improve the layout that work has gone into developing the illustrative layout.	Present Agreed	Absent TBC	Present Agreed	Present Agreed	Present Agreed	Absent TBC	Absent TBC	None	N/A
	Seascope: Project Visions and Design Statement.	3.7	<p>The ETG agreed to the outline of the factors that influenced the changes to the offshore layout from that presented in the PEIR, and acknowledged the amount of work which had been undertaken since the previous ETG. These factors included:</p> <ul style="list-style-type: none"> <li>• The proportion of the view affected by the development;</li> <li>• The angle of view in relation to main receptor activity;</li> <li>• The degree to which aesthetic or perceptual aspects of the landscape /view would be altered; and</li> <li>• The relationship between existing/ proposed/ future wind farms.</li> </ul> <p>The ETG requested whether design principles could be transferred into the DCO to ensure the principles of design currently being applied are secured. Equinor confirmed that as part of the work being undertaken for the Navigation Risk Assessment, layout commitments are being secured, although these primarily address layout requirements set out in MGN 654. Equinor also confirmed the reason for its decision to include the maximum sized turbine was to future proof the project.</p>	Present Agreed	Absent TBC	Present Agreed	Present Agreed	Present Agreed	Absent TBC	Absent TBC	None	N/A
	Seascope: Project Visions and Design Statement.	3.8	<p>NE agreed to provide copies of the following documents:</p> <ul style="list-style-type: none"> <li>• A Rampion 1 document that set out the how this project secured aesthetic led design principles via the marine authority whose interest / duty relates to safety and navigation during the examination.</li> </ul>	Present Agreed	Absent TBC	Present Agreed	Present Agreed	Present Agreed	Absent TBC	Absent TBC	None	N/A



Meetings	Discussion Points	ID	Agreements and Notes	Stakeholders							Outstanding agreements	Project Response
				NE	HE	NCC	NNDC	SNC BDC	NorCC	Norfolk Coast Partnership		
			<ul style="list-style-type: none"> <li>A NE document that provided general design principles to the Crown Estate in 2017/18.</li> </ul> <p>These were received post-meeting.</p>									
	Seascape: Single Frame Visualisations.	3.9	NE requested copies of the single frame visualisations presented at the ETG meeting to agree the focal points of each view. This was submitted and agreement reached post meeting.	Present Agreed	Absent TBC	Present Agreed	Present Agreed	Present Agreed	Absent TBC	Absent TBC	None	N/A
	Seascape: AOB.	3.10	The ETG agreed that it was not necessary to meet again prior to the submission of the DCO, unless any material comments were recorded as part of the sperate planned meetings with the Norfolk Coast Partnership.	Present Agreed	Absent TBC	Present Agreed	Present Agreed	Present Agreed	Absent TBC	Absent TBC	None	N/A
ETG 3 (Part 2 of 2) 08/02/2022	Landscape: OLEMP.	3.11	The ETG agreed that a BNG plan, which details biodiversity opportunities at Weybourne Woods, should be produced. NE requested this is shared with them for information. This BNG Plan is to be provided by Wild Frontier Ecology.	Present Agreed	Absent TBC	Present Agreed	Present Agreed	Present Agreed	Absent TBC	Absent TBC	None	A BNG Plan will be submitted as part of the DCO submission.
	Landscape: Assessment of the Norfolk Coast AONB.	3.12	The ETG agreed with that Norfolk Coast Area of Outstanding Natural Beauty Management Plan Strategy 2014-2019 should be used to inform the LVIA, due to the uncertainty of the ratification of the latest Norfolk Coast Area of Outstanding Natural Beauty Five Year Strategy 2019-2024.	Present Agreed	Absent TBC	Present Agreed	Present Agreed	Present Agreed	Absent TBC	Absent TBC	None	N/A
	Landscape: LVIA.	3.13	The ETG requested that a review was undertaken of the cable corridor's routes in relation to Mossy Mere Wood (close to Saxthorpe) due to its sensitivity.	Present Agreed	Absent TBC	Present Agreed	Present Agreed	Present Agreed	Absent TBC	Absent TBC	None	This matter falls outside of the scope of the LVIA, but will be addressed as part of the documentation submitted for the DCO submission.
	Landscape: OLEMP and Arboricultural Surveys.	3.14	Concerns were raised by the ETG that a full arboricultural survey would not be carried out until post-consent and considers that the information is needed earlier to inform the Examiners decision. Equinor agreed to review approach to tree survey.	Present Agreed	Absent TBC	Present Agreed	Present Agreed	Present Agreed	Absent TBC	Absent TBC	None	
	Landscape: Project Vision and Design & Access Statement.	3.15	The ETG agreed with the proposed approach to how Equinor will demonstrate, in the DCO application, how the project has been guided by overarching design principles / objectives, and will deliver a project that is in accordance with good practice (including safety), and demonstrates Good Design.	Present Agreed	Absent TBC	Present Agreed	Present Agreed	Present Agreed	Absent TBC	Absent TBC	None	N/A

Meetings	Discussion Points	ID	Agreements and Notes	Stakeholders							Outstanding agreements	Project Response
				NE	HE	NCC	NNDC	SNC BDC	NorCC	Norfolk Coast Partnership		
	Landscape: OLEMP.	3.16	<p>The ETG confirmed that the landscape proposals, related to the landscape management of the onshore cable corridor and the onshore substation, were broadly acceptable and responded well to the local landscape and its existing framework.</p> <p>Equinor confirmed its commitment to the following:</p> <ul style="list-style-type: none"> <li>Maintaining planting along the onshore cable corridor for the first 10 years following implementation, before being handed over to landowner.</li> <li>Planting and habitat creation around the onshore substation would be managed for the operational life of SEP and DEP.</li> </ul>	Present Agreed	Absent TBC	Present Agreed	Present Agreed	Present Agreed	Absent TBC	Absent TBC	None	N/A
Meeting just with Norfolk Coast Partnership 08/03/2022	Assessment of the Norfolk Coast AONB.	3.17	<p>The meeting welcomed and agreed to the presentation of the assessments of the Norfolk Coast AONB from all relevant topics in a separate document. Status of 2014 plan to be confirmed. AONB confirmed that the Heritage Coast interests are covered by the County Heritage team, being essentially a Heritage matter.</p>	N/A	N/A	N/A	N/A	N/A	N/A	Present Agreed	None	It was confirmed by the Norfolk Coast Partnership (via email on 23 February 2022) that the 'Norfolk Coast Area of Outstanding Natural Beauty Five Year Strategy 2019-2024' remains the current management plan for the Norfolk Coast AONB, and as used to inform the SVIA.
	Seascape: SVIA.	3.18	<p>The meeting agreed that the realistic worst case turbine layout presented will be assessed in the SVIA, and recognised the on-going work that has been undertaken since the PEIR / consultation responses to improve the layout that work has gone into developing the illustrative layout.</p>	N/A	N/A	N/A	N/A	N/A	N/A	Present Agreed	None	N/A
	Seascape: 9Project Visions	3.19	<p>The meeting agreed to the outline of the factors that influenced the changes to the offshore layout from that presented</p>	N/A	N/A	N/A	N/A	N/A	N/A	Present Agreed	None	N/A

Meetings	Discussion Points	ID	Agreements and Notes	Stakeholders							Outstanding agreements	Project Response
				NE	HE	NCC	NNDC	SNC BDC	NorCC	Norfolk Coast Partnership		
	and Design Statement.		<p>in the PEIR and acknowledged the amount of work which had been undertaken. These factors included:</p> <ul style="list-style-type: none"> <li>• The proportion of the view affected by the development;</li> <li>• The angle of view in relation to main receptor activity;</li> <li>• The degree to which aesthetic or perceptual aspects of the landscape /view would be altered; and</li> <li>• The relationship between existing/ proposed/ future wind farms.</li> </ul> <p>Equinor confirmed that as part of the work being undertaken for the Navigation Risk Assessment, layout commitments are being secured, although these primarily address layout requirements set out in MGN 654. Equinor also confirmed the reason for its decision to include the maximum sized turbine was to future proof the project.</p>									
	Seascape: Project Visions and Design Statement.	3.20	<p>Equinor agreed to provide copies of the following documents:</p> <ul style="list-style-type: none"> <li>• Outline CSIMP;</li> <li>• OTNR Review- guide to communities;</li> <li>• Equinor FAQ; and</li> <li>• PEIR site selection and alternatives chapters.</li> </ul> <p>These were received post-meeting.</p>	N/A	N/A	N/A	N/A	N/A	N/A	Present Agreed	None	N/A
	Landscape: Project Vision and Design & Access Statement.	3.21	<p>The meeting agreed with the proposed approach to how Equinor will demonstrate, in the DCO application, how the project has been guided by overarching design principles / objectives, and will deliver a project that is in accordance with good practice (including safety), and demonstrates Good Design.</p>	N/A	N/A	N/A	N/A	N/A	N/A	Present Agreed	None	N/A
	Landscape: LVIA.	3.22	<p>The meeting requested further information regarding the extent of HDD under the AONB and cable depths. This was all provided after the meeting, with Equinor confirming that it was not necessary, appropriate or justifiable to use trenchless methods to cross the entire AONB.</p>	N/A	N/A	N/A	N/A	N/A	N/A	Present Agreed	None	The AONB subsequently raised no concerns.

Meetings	Discussion Points	ID	Agreements and Notes	Stakeholders							Outstanding agreements	Project Response
				NE	HE	NCC	NNDC	SNC BDC	NorCC	Norfolk Coast Partnership		
	Landscape: OLEMP.	3.23	The meeting agreed that a BNG plan, which details biodiversity opportunities at Weybourne Woods and more generally, should be produced. Carbon sequestration to be considered.	N/A	N/A	N/A	N/A	N/A	N/A	Present Agreed	None	A BNG Plan will be submitted as part of the DCO submission.
	General.	3.24	The meeting agreed that it was not necessary to meet again prior to the submission of the DCO, unless any material comments were recorded following a briefing at the CMG of the Norfolk Coast Partnership.	N/A	N/A	N/A	N/A	N/A	N/A	Present Agreed	None	AONB confirmed nothing was raised at the CMG, other than the need for all stakeholders to keep talking and work together as much as possible to add value to existing schemes and contribute to nature recovery where possible. A BNG Plan will be submitted as part of the DCO submission.