



Planning Inspectorate

Issue Specific Hearing 2

Wednesday 15 and Thursday 16 January 2025

Supplementary Agenda Additional Questions

As set out in the Examination Timetable, the Examining Authority (ExA) has decided to substitute the normal practice of issuing written questions with the Rule 8 letter as the ExA believes that the responses received to Deadlines 1 and 2 will reduce the need for the ExA to ask a significant number of written questions.

Nevertheless, in preparation for this Hearing, the ExA has a number of questions that it considers either require relatively straightforward responses, clarification or the submission of additional information, or would potentially require a more detailed technical response that would be better provided in writing. Rather than use the time at the Hearing to get this information, the ExA has listed these questions in the table below and would ask that, unless otherwise stated, responses be submitted at **Deadline 1, 29 January 2025**.

Furthermore, the ExA is aware that several Interested Parties (IPs) such as Natural England and the Marine Management Organisation have indicated that they will not be attending the Hearing. The ExA has a number of questions where, if they were attending the Hearing, they would have sought a response from these IPs. To use the Examination time efficiently, these have also been included in this table or where a response is also being sought from the Applicants may arise through action points at the Hearing.

If anyone considers that the ExA needs to explore these matters orally then there will be the opportunity at the start of the Hearing to raise this with the ExA.

Number	Subject	Response by	Question/ Clarification
Agenda Item 1: Infrastructure and Other Users			
ISH2.2.1	Wake loss	The Applicants, Ørsted Hornsea Project Four Limited, Ørsted Hornsea Project Three (UK) Limited, CMS Cameron McKenna Nabarro Olswang LLP on behalf of DBA Projco, DBB Projco and DBC Projco	Describe your understanding of wake loss, what effects it can have and how is it assessed. What factors determine the effects from wake loss, such as wind patterns and strength? Is wake loss static throughout a month or year and what factors affect the severity of wake loss?
ISH2.2.2	Wake loss	The Applicants	The Fraser Nash Consultancy Offshore Wind Leasing Programme Array Yield Study [AS-014] used a wind turbine rotor diameter of 279.9 meters (m) and height of 169.9m. The maximum rotor diameter for the Proposed Development would be 344.08m and maximum height would be 394.08m [APP-071] , which is significantly larger. Can the conclusions of the study be applied to the Proposed Development when there are significant differences in the parameters being compared?
ISH2.2.3	Environmental Statement (ES) Chapter 16 [APP-130]	The Applicants	Table 16-9 in ES Chapter 16 [APP-130] does not present the distance from the Proposed Development to the Dogger Bank C or Dogger Bank D array areas (only the distance to the export cables). Please update the table accordingly.
ISH2.2.4	Cumulative effects	The Applicants	The Dogger Bank D Relevant Representation (RR) [RR-011] states that the Dogger Bank South application was submitted prior to the 2024 Dogger Bank D Scoping Report submission. Do you intend to update the ES to incorporate any relevant information from the scoping report? If so, when is this likely to be updated and do you foresee any significant changes?

Number	Subject	Response by	Question/ Clarification
Agenda Item 4: Marine and Coastal Processes			
ISH2.4.1	Disposal of dredged material, sediment deposition and proposed mitigation	The Applicants	Your response to Natural England's (NE) Relevant Representation (RR) [AS-048] states that, ' <i>sand wave deposition will try to avoid areas of priority habitats under NERC 2006 by the inclusion of a 50m buffer around the NERC habitats</i> '. Could you signpost where the Natural Environment and Rural Communities Act 2006 sites have been identified and buffer areas marked on a plan? If no such plan has been provided at this stage, please could this be provided? Please also explain how and where the commitment to avoid these sites is secured.
ISH2.4.2	Disposal of dredged material, sediment deposition and proposed mitigation	The Applicants	Can you explain your proposed authorisation process for the disposal of dredged material and the different stages of authorisation by the Marine Management Organisation (MMO)? Please confirm if the MMO would be required to sign off any final proposals before any dredging works would be undertaken. Explain where this is secured.
ISH2.4.3	Disposal of dredged material, sediment deposition and proposed mitigation	The Applicants	Reference to a maximum of 5% of turbine locations requiring drilling and a maximum of 5% of offshore platforms requiring drilling is made throughout the 'Disposal Site Characterisation Report' [APP-242] . In addition, ES Chapter 8 [APP-080] , table 8-1, ' <i>assumes 5% of all wind turbine and offshore platform locations will be drilled</i> ' and paragraph 158 of ES Chapter 8 [APP-080] states that, ' <i>pile driving will be used in preference to drilling where it is practicable to do so (i.e. where ground conditions allow)</i> '. Could you clarify the extent of proposed drilling for turbine and platform foundations, including monopiles and jackets, and explain how the 5% has been calculated? Could you also provide justification for the proposed 5% figure? On what basis has this been chosen? Finally, could you confirm how and where the 5% is secured in the draft Development Consent Order (DCO)?
ISH2.4.4	Cable Protection within the Dogger Bank Special Area of Conservation (SAC)	The Applicants	<p>Can you explain the rationale for the 10% requirement for cable protection within the Dogger Bank Special Area of Conservation (SAC)? Furthermore, could you clarify any additional studies and works that would need to be undertaken in order to refine the worst-case scenario and potentially reduce the 10% requirement? What would be the timescale for undertaking the works? Do you consider the work could be undertaken as part of the Examination? If not, why not?</p> <p>In line with the request by NE [RR-039], could you provide evidence from Dogger Bank A and Dogger Bank B to justify and present a realistic worst-case scenario for the remedial cable protection along 10% of the route?</p>

Number	Subject	Response by	Question/ Clarification
Agenda Item 5: Commercial Fisheries			
ISH2.5.1	Assessment definitions	The Applicants	Can you provide references for the receptor sensitivity, magnitude of impact and significance of effect definitions provided in Tables 13-10, 13-11 and 13-12 respectively in Chapter 13 of the ES [APP-117]?
ISH2.5.2	Assessment definitions	National Federation of Fishermen's Organisation (NFFO)	With reference to the magnitude of impact in Table 13-11 of Chapter 13 [APP-117], can the NFFO comment whether impacts up to 7 and 30 years are to be considered low and medium magnitudes respectively?
ISH2.5.3	Assessment data	NFFO	The NFFO RR [RR-034] raises concerns regarding the surveys undertaken and the associated information included in the assessment. The Applicants responded [PDA-013]. Would the NFFO like to elaborate on any outstanding concerns following the Applicants' response? If so, please highlight any specific details which have implications for the assessment submitted. It would be useful for you to provide references to support your concerns.
Agenda Item 7: Shipping and Navigation			
ISH2.7.1	Assessment references	The Applicants	Can you provide a reference to support which risks are to be considered as low as reasonably practicable (ALARP) as stated in paragraph 19 on the Navigational Risk Assessment [APP-124]?
Agenda Item 9: Seascape, Landscape and Visual			
ISH2.9.1	Lighting	The Applicants	Paragraph 7.80 of the East Riding of Yorkshire Council's Local Impact Report [PDC-007] suggests that for construction lighting, a community liaison approach should be set up before any lighting that would be required for longer periods or overnight would be installed. Should this commitment be added to the outline Code of Construction Practice [AS-094]? If not, why not?
ISH2.9.2	Candidate Yorkshire Wolds National Landscape	The Applicants	The Planning Inspectorate suggested in its scoping response [APP-232] that potential effects on the candidate Yorkshire Wolds National Landscape should be considered on the basis of a zone of theoretical visibility, rather than distance from the Proposed Development, however you have not adopted this. Please explain why you have determined that a distance of between 12.5km and 15.5km from the Proposed Development results in effects that would not be significant.
ISH2.9.3	Candidate Yorkshire Wolds National Landscape	The Applicants	Would there be views of any elements of the Proposed Development during construction or operation from the candidate Yorkshire Wolds National Landscape?

Number	Subject	Response by	Question/ Clarification
ISH2.9.4	Candidate Yorkshire Wolds National Landscape	East Riding of Yorkshire Council (ERYC)	Do you agree with the Applicants' conclusion that the candidate Yorkshire Wolds National Park Landscape would not be affected by the Proposed Development and, if not, what would you consider the effect to be and what leads you to this conclusion.
ISH2.9.5	Residential Visual Amenity Assessment	The Applicants and ERYC	<p>Applicants: Did you consider conducting a Residential Visual Amenity Assessment (RVAA) to evaluate and assess any likely change to the visual amenity for nearby dwellings resulting from the Proposed Development? If not, why not?</p> <p>East Riding of Yorkshire Council: Do you consider that a RVAA should have been carried out and, if so, why?</p>
ISH2.9.6	Visualisations	The Applicants	<p>Provide a response to the following queries on the selection of locations for viewpoints (VP) [PDA-010] and provide justification for your answers:</p> <ul style="list-style-type: none"> • Why was the location for VP3 looking towards the Beverley 20 walking route taken from the selected location, rather than in more elevated position to the north of the VP? Why was the location for VP3 selected over a closer range view further south, such as the public right of way (PRoW) labelled 'Walkington Footpath No. 9/ Beverley 20 Footpath/ East Riding Heritage Way' shown on Page 29 of the PRoW Plan [APP-017]? • Was a VP considered along Walkington Footpath No. 4 at the bridge crossing over the A1079 that provides vehicle and pedestrian access to Butt Farm? If not, why not? • Was a VP from the A164 from the north-east, towards the proposed converter stations considered? If not why, not? • Why was VP6 taken from the chosen location rather than slightly further to north where the PRoW turns a corner and more exposed views of the site are available?
ISH2.9.7	Significance of Effects	The Applicants	Explain why the threshold of significance for landscape effects in ES Chapter 23 [APP-192] from the proposed converter stations is defined as being at no more than 1km away – how has this been derived? Do you consider the effects at 1km away to be localised effects?

Number	Subject	Response by	Question/ Clarification
ISH2.9.8	Converter Stations	The Applicants	Provide indicative, annotated cross-section drawings of the converter station area, along northern and southern points of the proposed platform (in a generally east-west direction) showing existing and proposed features, levels and tie-ins. Also provide a longitudinal section drawing (in a generally north-south direction) showing existing and proposed features, levels and tie-ins. These can be provided at Deadline 2 if it is not possible to provide these by Deadline 1.
ISH2.9.9	Temporary Construction Compounds	The Applicants	Provide more information regarding the likely visual appearance of temporary construction compounds that have been assessed in the ES. For example: what are the maximum heights for fencing, equipment and cabins; what are the effects from lighting on landscape character and visual amenity? Should any parameters for the size, colour, design or height of the temporary office and welfare facilities in the temporary construction compounds be incorporated into the Design and Access Statement for example [APP-233]?
ISH2.9.10	Outline Landscape Management Plan [AS-096]	The Applicants	Paragraph 13 of the outline Landscape Management Plan [AS-096] refers to reinstatement of trees and hedgerow 'as soon as is practicable after installation of the cables'. Which cables does this refer to? Please update the management plan to be more specific about timescales for reinstatement planting.
ISH2.9.11	Outline Landscape Management Plan [AS-096]	The Applicants	In East Riding of Yorkshire Council's Local Impact Report [PDC-007], paragraph 7.53 sets out the Council's planting guidance for hedgerows. Are you prepared to incorporate this into the outline Landscape Management Plan [AS-096]?
ISH2.9.12	Landscape Enhancements	ERYC	Are there any policies in the ERYC Local Plan that are relevant to the assessment of this application that require landscape enhancements, and if so, would the Proposed Development comply with them?
ISH2.9.13	Landscaping and drainage	The Applicants	ERYC's Local Impact Report [PDC-007] requests that the surface water drainage strategy be landscape led and be developed to integrate with and contribute to the overall landscaping scheme. Could the landscaping scheme be amended to achieve this? If not, why not and, if yes, when would these amendments be submitted, and how could this be secured through the draft DCO?
ISH2.9.14	Important Hedgerows	The Applicants	How have you defined important hedgerows for the purposes of the landscape and visual assessment? Is the status of any hedgerows likely to change between now and when construction would start? How would this affect the Proposed Development and any proposed mitigation measures?

Number	Subject	Response by	Question/ Clarification
ISH2.9.15	Hedgerows	The Applicants	As a worst-case scenario, how many metres of hedgerow would be removed across the whole of the Order Limits? Are you confident that there is sufficient space in the Order Limits to accommodate replanting to match this level of removal?
ISH2.9.16	Trees and Hedgerows	The Applicants	Are there instances where you consider that the removal of trees or hedgerow that cannot be replanted in the same location would have a harmful effect on landscape character?
ISH2.9.17	Trees – ash die back	The Applicants	The outline Code of Construction Practice [AS-094] notes that the converter stations would benefit from existing screening provided by Johnson’s Pit, Eleven Acre Plantation and Bentley Moor Wood (paragraph 208). However, ES Chapter 18 (Terrestrial Ecology and Ornithology) [AS-109] , paragraph 142] states that ash dieback was observed in the trees surveyed, and it is possible for infected trees to fall or collapse unexpectedly as a consequence of the disease. To what extent does this screening rely on ash trees and what would be the impact of ash die-back that has been noted in these woods in terms of effects on landscape character and visual amenity?
ISH2.9.18	Trees – ash die back	ERYC	Do you have any comments or concerns regarding ash die-back and the potential effects it would have on landscape character or visual amenity in relation to the Proposed Development?
ISH2.9.19	Good Design	The Applicants	The Design and Access Statement [APP-233] should be revised to set out the vision for the completed development with a narrative on how this has been taken from conception through to the final design, how this would achieve sustainability, create a new place and hold design together. Clarify how the design evolved from the initial brief and how the design rationale was taken forwards. Explain the beneficial outcomes that result from the adopting good design principles. This can be provided at Deadline 2 if it is not possible to provide this at Deadline 1.
ISH2.9.20	Good Design	The Applicants	Explain your design rationale for the converter stations – what design principles were established from the outset of the Proposed Development to guide the development from conception through to operation and where are these reflected in the proposed indicative layout and design of the converter stations.
ISH2.9.21	Good Design	The Applicants	How do the design principles of the Proposed Development respond positively to climate, people, place and value? Would the Proposed Development create a sense of place? How would the community benefit from the Proposed Development, notably the proposed converter stations, in terms of sense of place?

Number	Subject	Response by	Question/ Clarification
ISH2.9.22	Good Design	The Applicants	Paragraph 13 of the Design and Access Statement [APP-233] states that, ' <i>where relevant, the design will incorporate adaptations to address future impacts of climate change</i> '. What might some of these adaptations be and where could they be relevant?
ISH2.9.23	Good Design	The Applicants	The Design and Access Statement [APP-233] provides two options for materials for the converter stations, though both are presented as having constraints. Are there any other potential options available in terms of materials? Could a mixture of both be utilised? Are there any innovative or new materials that you are aware of being developed that could be utilised? Could the Design and Access Statement be updated to explore other potential options?
Agenda Item 10: Onshore Historic Environment			
ISH2.10.1	Built Heritage	ERYC	Your Local Impact Report [PDC-007 , paragraph 7.87] suggests that there would be less than substantial harm to conservation areas and listed buildings from the route of the pipeline, the landfall zone and substation zone. The ExA requests the following clarification: <ul style="list-style-type: none"> • Confirm what you mean by '<i>pipeline</i>'. • Set out each conservation area and listed building the Proposed Development would cause less than substantial harm to, and why. • Detail whether this harm would be as a result of construction or operation of the Proposed Development. • Confirm whether any pre-mitigation or residual effects would be significant in Environmental Impact Assessment (EIA) terms. This can be provided at Deadline 2 if it is not possible to provide this at Deadline 1.
ISH2.10.2	Built Heritage	ERYC	Your Local Impact Report [PDC-007 , paragraph 7.92] states that key views of Beverley Minster and those from its tower would not be substantially harmed by the proposal. Please confirm if you consider there would be less than substantial harm to Beverley Minster or its setting, what you consider the level of harm to be to this heritage asset in EIA terms and why you consider this to be the case.
ISH2.10.3	Archaeology	The Applicants	Comments from Historic England [APP-174] regarding effects on archaeology suggest that the Yorkshire Wolds and its immediate hinterland are a priority area for Historic England, with a research framework for the Wolds, which was not referenced in the scoping report. The ExA cannot see that this is referenced in ES Chapter 22 [AS-092]. Provide more information on the research framework, its relevance to the application and how this was considered as part of the ES.

Number	Subject	Response by	Question/ Clarification
ISH2.10.4	Archaeology	ERYC	Do you consider the proposed mitigation measures in the outline Onshore Written Scheme of Investigation [APP-239] to be adequate? If not, please set out any recommended changes.
ISH2.10.5	Archaeology	The Applicants	Does the Phase Two trial trenching address the shortfall in trial trenching at the proposed converter station site identified in ES Chapter 22 [AS-092]? (Paragraph 163 states that trial trenching was abandoned due to adverse weather and ground conditions.)
ISH2.10.6	Archaeology	The Applicants	How do the findings from the Phase Two trial trenching affect the findings of ES Chapter 22 [AS-092]? Are any additional mitigation measures required?
ISH2.10.7	Archaeology	The Applicants	How much of the onshore area has now been assessed by trial trenching and geophysical survey?
ISH2.10.8	Archaeology	The Applicants	Is it likely that items of significant archaeological potential identified in sections 5 and 6 trial trenching areas [AS-023 and AS-024] would be able to be preserved <i>in situ</i> ? If not, does not preserving the items of importance <i>in situ</i> result in the potential to increase the significance of effect and, if so, is this accounted for in the ES?

Number	Subject	Response by	Question/ Clarification
ISH2.10.9	Defining the level of harm to heritage assets	The Applicants	<p>The ExA requests that the updated information provided in ES Chapter 22 [AS-092] regarding the level of harm attributed to heritage assets as a result of the Proposed Development is reviewed again. The ExA has the following observations:</p> <ul style="list-style-type: none"> • In some cases, the degree of harm (ie whether any harm to heritage assets would be substantial or less than substantial) has been identified under the 'magnitude of effect', but in other instances the level of harm is referred to in the 'significance of effect'. The ExA requests that the identified level of harm pre- and post-mitigation for each potential impact identified in ES Chapter 22 and for each heritage asset is provided. This needs to be reviewed consistently throughout the ES Chapter and where a substantial or less than substantial harm is identified, this needs to be robustly justified. • For example, during construction, the ES does not conclude on whether there would be residual substantial or less than substantial harm to heritage assets following mitigation for Impact 2. It only refers to potential for substantial harm when determining the magnitude of harm, it does not conclude whether there would be substantial or less than substantial harm during construction following mitigation. This is also the case for Impacts 3 and 4. For Impacts 7 and 8, the ES does not detail the level of harm pre- and post-mitigation for each heritage asset, only some. <p>The ExA recommends that a table is produced, listing the heritage assets, the effects and the attributed level of harm (ie substantial or less than substantial harm) pre- and post-mitigation. For example, this information could be worked into Table 22-18, but it must identify the effects on each heritage asset, rather than in groups. This can be provided at Deadline 2 if it is not possible to provide this by Deadline 1.</p>
ISH2.10.10	Lighting	Historic England	Do you have any concerns regarding the effects from lighting on heritage assets during construction or operation of the Proposed Development?
ISH2.10.11	Mitigation	The Applicants	Noting that the outline Code of Construction Practice [AS-094] only appears to refer to mitigation measures for buried archaeology (the outline Written Scheme of Investigation [APP-239]) during construction, how would the protection of the two above-ground, non-designated heritage assets in the onshore development landfall area be ensured (the two World War II pillboxes identified in Table 22-12 of ES Chapter 22 [AS-092])?

Number	Subject	Response by	Question/ Clarification
ISH2.10.12	Mitigation	Historic England	In your RR [RR-022] , you state that you do not consider that, ' <i>screening through planting is an effective or lasting mitigation measure in this instance</i> ' with regards to mitigating effects on the scheduled monument close to Butt Farm. What would you suggest might be an appropriate form of mitigation? Do you consider that the proposed landscaping would provide any degree of mitigation?
ISH2.10.13	Historic England recommendations	The Applicants	In your response to Historic England's RR [RR-022] , you state that proposals for interpretation and investigation of the heavy anti-aircraft gunsite at Butt Farm have been shared and that a site visit was planned to further discuss the proposals. Can you provide an update on this and whether the site visit has been undertaken?
ISH2.10.14	Historic England recommendations	The Applicants, ERYC and Historic England	Are there any current cross-project forums or meetings that take place and, if so, could public outreach and community engagement aims regarding the mitigation and enhancements of heritage assets (as recommended by Historic England [RR-022]) be considered at these? Could there be a commitment in the draft DCO or any of the supporting documents to try to facilitate cross-project working?
ISH2.10.15	Historic England recommendations	The Applicants	Could a commitment to consider offshore and onshore cultural heritage holistically be captured by the draft DCO or supporting documents, such as the outline Written Scheme of Investigation [APP-239] for example (as recommended by Historic England [RR-022])?
ISH2.10.16	Viewpoints	Historic England and ERYC	Did you agree to all the cultural heritage viewpoints prior to submission of the application as suggested by the Applicants' [PDA-013] ? If not, please explain any additional viewpoints you requested and why.
Agenda Item 11: Onshore Water Environment			
ISH2.11.1	Assessment definitions	The Applicants	Can you provide a specific reference for 'Standards for Highways, 2020' in Table 20-6 of Chapter 20 of the ES [APP-163] ? This should include the relevant Design Manual for Road and Bridges document and clause numbers.
ISH2.11.2	Assessment definitions	The Applicants	Can you provide references for the receptor sensitivity, magnitude of impact and significance of effect definitions provided respectively in Tables 20-7, 20-8 and 20-9 in Chapter 20 of the ES [APP-163] ?
ISH2.11.3	Assessment methodology	The Applicants	Can you provide a reference for the methodology adopted to identify the magnitude of impact for trenched watercourse crossings as detailed in paragraph 106 of Chapter 20 of the ES [APP-163] ?

Number	Subject	Response by	Question/ Clarification
ISH2.11.4	Assessment methodology	The Applicants	Can you provide a reference for the methodology adopted to identify the magnitude of impact resulting from exposed land in a waterbody catchment detailed in paragraph 124 and Table 20-16 in Chapter 20 of the ES [APP-163]?
ISH2.11.5	Groundwater mapping	The Applicants	Can you provide updated groundwater body Figures 20-3-2a to 20-3-2c [AS-075] to better identify source protection zone 1? The current colour scheme may lead to confusion between source protection zone 1 and the proposed onshore development area.
ISH2.11.6	Groundwater mapping	The Applicants	In response to the Environment Agency's RR [RR-015], can you provide, or signpost to, the following: <ul style="list-style-type: none"> the location of source protection zone 1 within or less than 250 metres outside the proposed Order Limits; and any groundwater abstractions intended for human consumption or food production purposes within or less than 50m of the proposed Order Limits. These should be clearly distinguished from instances at greater distances from the proposed Order Limits.
Agenda Item 12: Onshore Ecology			
ISH2.12.1	Proposed Trees and Hedgerows Removal	The Applicants	The line of trees identified as H0036 on page 14 of the Tree Preservation Order (TPO) and Hedgerows Plan (Rev 3) [AS-026] is shown for removal, whereas Sheet 10 of Appendix 5: Preliminary Tree Impact Plan of the Arboricultural Survey Report Preliminary Arboricultural Impact Assessment and Outline Arboricultural Method Statement (Rev 2) [AS-036 and AS-037] show the same line of trees to be retained through the use of trenchless crossing techniques. Could you clarify what is proposed here and update the documents accordingly?
ISH2.12.2	Proposed Trees and Hedgerows Removal	The Applicants	Sheet 11/12 of Appendix 5: Preliminary Tree Impact Plan of the Arboricultural Survey Report, Preliminary Arboricultural Impact Assessment and Outline Arboricultural Method Statement (Arboricultural Report) (Rev 2) [AS-036 and AS-037] shows the proposed removal of a number of trees (T151 to T166, and G37 and G38) at the crossing at Catwicks Head. However, on page 16 of the TPO and Hedgerows Plan (Rev 3) [AS-026], the crossing is only identified for the removal of hedgerows. Could you explain whether the use of trenchless crossing techniques would be more appropriate in this location?
ISH2.12.3	Proposed Trees and Hedgerows Removal	The Applicants	In relation to the replacement of existing trees, please could you define the term 'like for like' referenced in paragraph 44 of the Outline Ecological Management Plan (Rev 3) [AS-114] and [AS-115]?

Number	Subject	Response by	Question/ Clarification
ISH2.12.4	Impacts on commuting and foraging bats	ERYC	Your Local Impact Report [PDC-007] would not appear to make reference to the appropriateness of information in relation to commuting and foraging bats. Please could you confirm your views on the assessment of commuting and foraging bats? Do you consider additional mitigation measures should be considered and, if so, what should they be?
ISH2.12.5	Biodiversity Net Gain	The Applicants	Section 4.6.7 of the Overarching National Policy Statement (NPS) for Energy (NPS EN-1) states that applicants, ' <i>should use the latest version of the biodiversity metric to calculate the baseline present planned biodiversity net gain outcomes</i> ', and ' <i>should be presented in full as part of their application</i> '. Could you clarify whether the Biodiversity Net Gain (BNG) Strategy uses the latest Defra statutory metric tool and confirm that moving forward, in line with paragraph 120 of the BNG Strategy [APP-157], full details of the interactive metric calculator (in excel) will be provided?
ISH2.12.6	Biodiversity Net Gain	The Applicants	Section 4.6.10 of the Overarching NPS for Energy EN-1 states that, ' <i>BNG should be applied after compliance with the mitigation hierarchy and does not change or replace existing environmental obligations, although compliance with those obligations will be relevant to the question of the baseline for assessing net gain and if they deliver an additional enhancement beyond meeting the existing obligation, that enhancement will count towards net gain</i> '. Could you confirm that there is no overlap or double counting in relation to the proposed mitigation measures to reduce impact, and the proposed additional BNG planting? Please could you provide a post-development habitat plan setting out indicative BNG proposals with a clear distinction between environmental obligations and mitigation proposals? Please also confirm when the plan would be provided?
ISH2.12.7	Biodiversity Net Gain	The Applicants	Do you intend to include land in the onshore cable corridor as part of the implementation of the proposed BNG Strategy? If so, could you explain if and how any existing agri-environment scheme land would be considered? How would you ensure that an enhancement funded by an agri-environment scheme would not be used to fulfil a BNG commitment? How is the 30-year management requirement secured if land is returned to previous landowners? Who would be responsible?
Agenda Item 13: Land Use and Ground Conditions			
ISH2.13.1	Assessment definitions	The Applicants	Can you provide references for the receptor sensitivity, magnitude of impact and significance of effect definitions provided respectively in Tables 19-7, 19-8 and 19-9 in Chapter 19 of the ES [APP-158]?

Number	Subject	Response by	Question/ Clarification
ISH2.13.2	Assessment definitions	The Applicants	Can you provide references for the receptor sensitivity, magnitude of impact and significance of effect definitions provided respectively in Tables 21-6, 21-8 and 21-10 in Chapter 21 of the ES [AS-111]?
ISH2.13.3	Agricultural land loss during construction	The Applicants	Can you quantify the area of land temporarily restricted for agricultural use for longer than two years (the temporary construction compounds along the onshore export cable corridor, transition jointing bay compound in the landfall zone, the jointing bays located approximately every 750m to 1500m, and sections of haul road) [AS-111 , paragraph 104]? This should include a plan to identify the sections of haul road that this applies to.
Agenda Item 15: Noise and Vibration			
ISH2.15.1	Assessment Methodology	The Applicants	<p>The construction phase noise assessment methodology in ES Chapter 25 [APP-201] confirms that noise levels for the construction phase are based on methods and guidance in BS 5228-1. Annex E of BS 5228-1 states that, for Category C, a level of 55dB (for night-time), 65dB (for evening and weekends) or 75dB (for daytime and Saturday morning), depending on time of day, is deemed to be potentially significant (if the total noise level for the period increases by more than 3dB due to site noise). However, as noted, an additional 5dB to 10db have been applied to identify high magnitude of impact during different times of night and day (Table 25-10, Construction Noise Magnitude of Impact Criteria [APP-201]).</p> <p>The baseline noise results (Table 25-17, Baseline Noise Monitoring Results [APP-201]) indicate low existing noise levels (Category B thresholds) for the measurement locations near the proposed converter station. By using Category C thresholds plus an additional 5dB to 10db (Table 25-10 [APP-201]), the magnitude of change between the baseline (Table 25-17) and activity (Table 25-10) is therefore consequently high.</p> <p>Can you provide justification for the departure from the strict application of the ABC Method in BS 5228-1 and explain why it was not followed in applying (potentially lower) thresholds? Clarify why the approach taken is considered to be appropriate in this context and highlight any recent and relevant precedents using the same or a similar approach.</p>

Number	Subject	Response by	Question/ Clarification
ISH2.15.2	Assessment Methodology	The Applicants	<p>Following on from above, paragraph 73 of the construction phase noise assessment methodology of ES Chapter 25 [APP-201] lists other project-specific factors that could be considered to determine the magnitude of impact, receptor sensitivity and significance. However, no further explanation is provided in relation to the individual receptors. For example, the magnitude of impact for Receptor (R) 19 is stated as 'high' in paragraph 154, 'medium' in Table 25-19 of [APP-201] and 'low' in Table 25-3-5 (of Appendix 25-3 Construction Noise Assessment [APP-205]).</p> <p>In addition, in relation to R38, Table 25-19 of [APP-201] identifies a low magnitude of impact and Table 25-3-5 of [APP-205] identifies a high magnitude of impact. Can you clarify how the different magnitude of impact levels have been arrived at and how this has resulted in the stated significance levels?</p>
ISH2.15.3	Construction Noise from night-time HDD working	The Applicants	<p>Receptor R58 is located within the construction noise buffer and adjacent to the Order Limits where horizontal directional drilling (HDD) is proposed (as shown on Figure 25-1c [APP-202]). However, the receptor is not considered in Table 25-3-5 (Predicted Construction Noise Levels - Trenchless Crossing Locations) of Appendix 25-3, Construction Noise Assessment [APP-205]. Please could you justify why R58 has not been assessed in relation to night-time HDD working? Is there a requirement to consider additional mitigation for the receptor? Clarify how this would be secured.</p>