

Outer Dowsing Offshore Wind

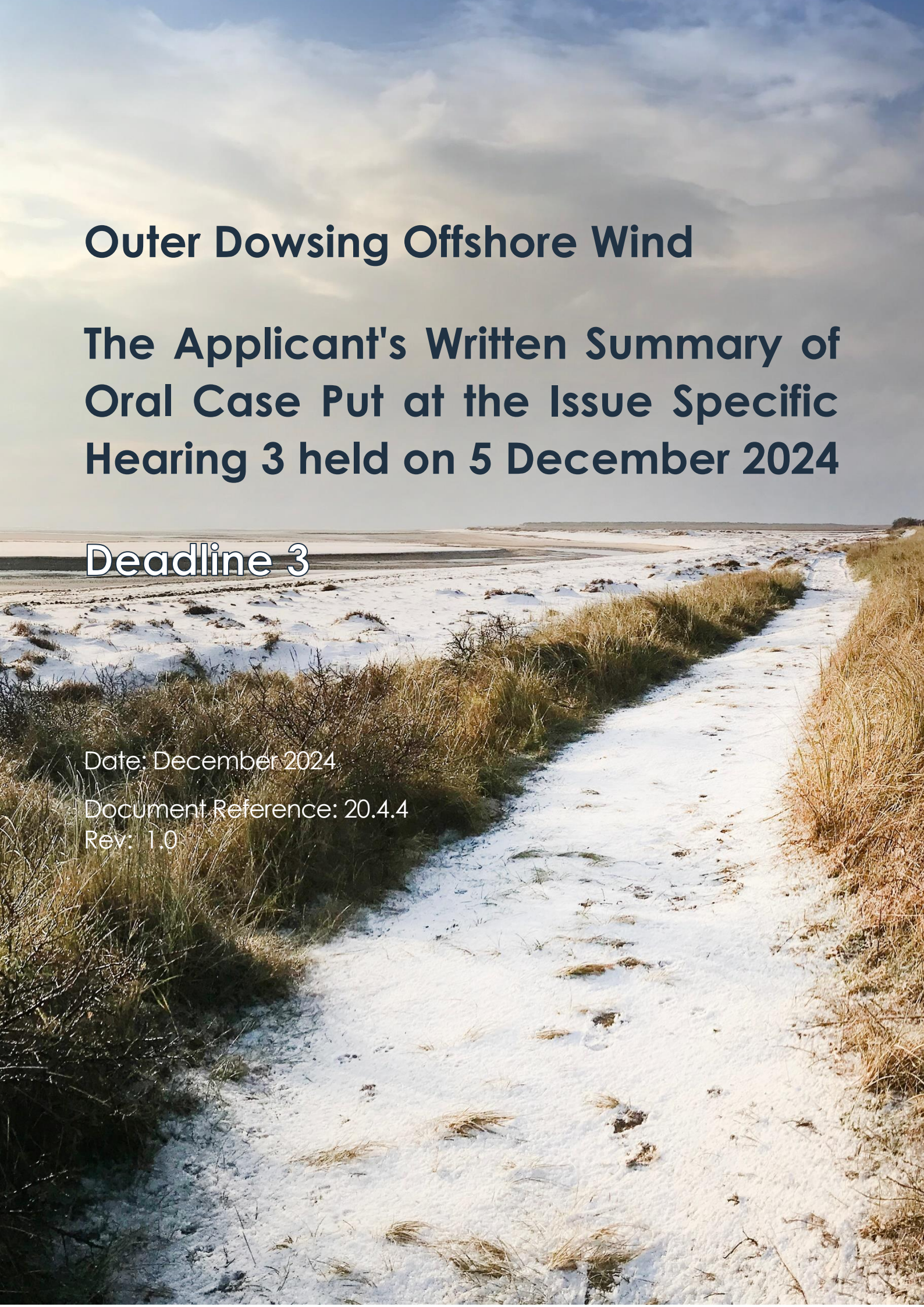
The Applicant's Written Summary of Oral Case Put at the Issue Specific Hearing 3 held on 5 December 2024

Deadline 3

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Acronyms & Definitions

Abbreviations / Acronyms

Abbreviation / Acronym	Description
BMV	Best and Most Versatile
DCO	Development Consent Order
ECC	Export Cable Corridor
EIA	Environmental Impact Assessment
ES	Environmental Statement
HND	Holistic Design Network
IAQM	Institute of Air Quality Management
NESO	National Energy Systems Operator
NGSS	National Grid Substation
oCoCP	Code of Construction Practice
OFH	Open Floor Hearing
OnSS	Onshore Substation
OTNR	Offshore Transmission Network Review
SMP	Soil Management Plan

Terminology

Term	Definition
The Applicant	GT R4 Ltd. The Applicant making the application for a DCO. The Applicant is GT R4 Limited (a joint venture between Corio Generation (and its affiliates), Total Energies and Gulf Energy Development (GULF)), trading as Outer Dowsing Offshore Wind. The Project is being developed by Corio Generation, TotalEnergies and GULF.
Cumulative impact	Impacts that result from changes caused by other past, present or reasonably foreseeable actions together with the Project.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for a Nationally Significant Infrastructure Project (NSIP).
Effect	Term used to express the consequence of an impact. The significance of an effect is determined by correlating the magnitude of the impact with the sensitivity of the receptor, in accordance with defined significance criteria.
Environmental Impact Assessment (EIA)	A statutory process by which certain planned projects must be assessed before a formal decision to proceed can be made. It involves the collection and consideration of environmental information, which fulfils the assessment requirements of the EIA Regulations, including the publication of an Environmental Statement (ES).
Environmental Statement (ES)	The suite of documents that detail the processes and results of the EIA.

Term	Definition
Export cables	High voltage cables which transmit power from the Offshore Substations (OSS) to the Onshore Substation (OnSS) via an Offshore Reactive Compensation Platform (ORCP) if required, which may include one or more auxiliary cables (normally fibre optic cables).
High Voltage Alternating Current (HVAC)	High voltage alternating current is the bulk transmission of electricity by alternating current (AC), whereby the flow of electric charge periodically reverses direction.
Impact	An impact to the receiving environment is defined as any change to its baseline condition, either adverse or beneficial.
Landfall	The location at the land-sea interface where the offshore export cables and fibre optic cables will come ashore.
Link boxes	Underground metal chamber placed within a plastic and/or concrete pit where the metal sheaths between adjacent export cable sections are connected and earthed.
Mitigation	Mitigation measures are commitments made by the Project to reduce and/or eliminate the potential for significant effects to arise as a result of the Project. Mitigation measures can be embedded (part of the project design) or secondarily added to reduce impacts in the case of potentially significant effects.
National Grid Onshore Substation (NGSS)	The National Grid substation and associated enabling works to be developed by the National Grid Electricity Transmission (NGET) into which the Project's 400kV Cables would connect.
Onshore Export Cable Corridor (ECC)	The Onshore Export Cable Corridor (Onshore ECC) is the area within which, the export cables running from the landfall to the onshore substation will be situated.
Onshore substation (OnSS)	The Project's onshore HVAC substation, containing electrical equipment, control buildings, lightning protection masts, communications masts, access, fencing and other associated equipment, structures or buildings; to enable connection to the National Grid
Outer Dowsing Offshore Wind (ODOW)	The Project.
Order Limits	The area subject to the application for development consent, The limits shown on the works plans within which the Project may be carried out.
The Planning Inspectorate	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects (NSIPs).
Pre-construction and post-construction	The phases of the Project before and after construction takes place.

Term	Definition
The Project	Outer Dowsing Offshore Wind, an offshore wind generating station together with associated onshore and offshore infrastructure.
Project design envelope	A description of the range of possible elements that make up the Project’s design options under consideration, as set out in detail in the project description. This envelope is used to define the Project for Environmental Impact Assessment (EIA) purposes when the exact engineering parameters are not yet known. This is also often referred to as the “Rochdale Envelope” approach.

1 Introduction and Document Purpose

1. This document is provided in line with the Examining Authority's (ExA's) Rule 8 letter (PD-011) request for submission of "written summaries of oral case put at any of the hearings during the w/c 2 December 2024".
2. ISH3 was held virtually via Microsoft Teams on Thursday 4 December 2024 at 10am and followed the agenda at Table 1 of EV7-001. The below provides summaries of the Applicant's submission against each of the agenda items.
3. Summaries of oral submissions of parties other than the Applicant are provided only to the extent necessary to give the Applicant's submissions context.

2 Written Summary of Oral Case Put at the Issue Specific Hearing 3

Table 0.11: Written Summary of the Applicant’s Oral Case at CAH1

Agenda Item	ExA Question / Context for discussion	Applicant’s Response
3.1 Welcome and Introductions		
3.1	The Examining Authority (“ExA”) opened the hearing, introduced themselves and invited those parties present to introduce themselves.	Hereward Phillpot KC (HPKC) set out that he appeared on behalf of the Applicant and that he would introduce others appearing on behalf of the Applicant when they required to contribute.
3.2 Landscape and Visual Effects		
3.2 Landscape study area	In response to the ExA’s questions regarding the size of the Landscape study area, Lincolnshire County Council (“LCC”), among other things, agreed that the 5km study area was appropriate but that the Applicant required to keep an “open mind” in case of design change.	HPKC stated that the assessment undertaken included identification of an appropriate study area, reflecting the Rochdale Envelope (a realistic worst case scenario) and in so far as the design might evolve it can only evolve within those parameters. On that basis there was no justification for suggesting that the ExA or Secretary of State should look at an area beyond 5km.
3.2 Trees and Hedgerows	The ExA raised the LCC’s view that the success rate of planting requires to be high for the Applicant’s proposed landscape mitigation and questioned how, given this reliance, the Applicant could ensure adequate screening at 15 years without the maintenance period extending beyond 5 years.	Jo Phillips, the Applicant’s Landscape and Visual and Onshore Design Lead and an OPEN Associate Director, set out that <ul style="list-style-type: none"> a. The Applicant’s planting mitigation is set out in its Outline Landscape Ecology Management Strategy (“OLEMS”) and that methods of establishment, implementation and aftercare will be secured in the Landscape Management Plan (LMP) to give certainty; the Applicant has been in discussion with LCC regarding ensuring high success rates via good soil health, the use of native and appropriate species and through the use of British standards. b. The 5 year period for replacement planting is based on the fact that plant failures are most likely to occur within the

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		<p>first five years and that after five years a process of thinning out will be implemented. This means plant failures (and resultant replanting) will take place within the first five years and failures after this period are less likely but that thinning would be used to remove any subsequent failures and make space for remaining plants to thrive.</p> <ul style="list-style-type: none"> c. Regarding screening, substantial and beyond-standard depth of screening has been used at 10-15 metres; d. Planting on others' land would be monitored via six-monthly visits to ensure plants were thriving; e. Long-term maintenance would be secured through terms in relevant land agreements requiring maintenance over 25 – 30 years, responsibility for which would pass to the Offshore Transmission Owner.
3.3 Design		
3.3 Comments and observations relating to the Applicant's approach to design	The ExA asked the Applicant to set out its design process, with specific reference to the Onshore Substation (“OnSS”).	<p>Jo Phillips set out that a full and robust approach to design had been undertaken:</p> <ul style="list-style-type: none"> a. The Applicant has set out a Design Vision, a wider Design Approach Document which sets out the design process it has undergone and its consultation. b. The Applicant had made use of the National Infrastructure Commission four key design principles (Climate, People, Place and Value) which have been used to shape the Applicant's design principles which are dealt with in more detail in the Applicant's Design Principles Statement. <p>In specific relation to the OnSS, though detailed design has not yet been undertaken, the Rochdale Envelope approach has been used.</p>

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		<p>The key question of siting considers a broad range of factors with a multi-disciplinary project team carrying out constraints mapping considering issues such as archaeology, hydrology, soils, land use, and providing extensive analysis of where best to place the OnSS and considering the mitigation hierarchy including distance from residents.</p>
<p>3.3 Comments and observations relating to the Applicant's approach to design</p>	<p>The ExA asked about the current stage of the Applicant's detailed design, noting that there is not an expectation to have reached detailed design but asking how the mitigation of impact can be meaningfully assessed in the absence of building design.</p>	<p>The Applicant's witnesses explained the implications of the use of different substation technologies and how the assessment, with this flexibility, has proceeded on this basis.</p> <ul style="list-style-type: none"> a. First, Garrett Roche, the Applicant's Onshore Civil Engineer, set out that use of Gas-insulated Switchgear ("GIS") technology would result in a larger structure but a smaller site footprint; use of Air-Insulated Switchgear ("AIS") would mean fewer buildings but a larger site footprint. b. Jo Phillips set out that the Applicant has provided indicative models of both AIS and GIS (and included as part of the LVIA visualisations submitted at the DCO application stage) and that because the look and feel of such substations don't typically change much, a robust and reliable assessment may be carried out. c. Regarding buildings, Jo Phillips set out that AIS involve, in the main, exposed infrastructure rather than infrastructure within buildings (though AIS has some reduced height buildings for controls and ancillary equipment), whereas GIS equipment is housed within buildings. Because the Project is engineering-led there is limited flexibility in changing the technology and therefore buildings. However there is scope for application of colour as well as landscape

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		<p>design through planting. From a LVIA perspective, at distances of 700 – 800 metres to 1 kilometre where impression rather than detail is seen colour and pattern provide key opportunities.</p> <p>d. HPKC noted that there was nothing unusual or unique about the electrical infrastructure proposed in this case, and the experience gleaned from previous similar developments was helpful in facilitating meaningful assessment of landscape and visual effects. The experience and precedent in developed substations suggests that once AIS or GIS is chosen the actual flexibility is limited by technical considerations, but there is a lot of learning about what type and level of flexibility does exist in substation design and how to proceed into detailed design stage (recognising the design principles developed by the Project).</p>
<p>3.3 Comments and observations relating to the Applicant's approach to design</p>	<p>The ExA made clear its view of the unsatisfactory nature of a number of substation buildings and the need for good design beyond simply choice of colour. The ExA asked specifically whether architects had been engaged.</p>	<p>HPKC stated that until specific suppliers are selected, architectural input is not considered to be timely.</p> <p>He noted that the Applicant was not the first project to seek consent to develop a substation under current policy and that the Applicant is therefore able to benefit from the experience and precedent of earlier projects. The Applicant's suite of design documents will ensure that good design principles are properly reflected in the detailed design stage, building on what has been done so far to ensure good design.</p>

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<p>3.3 Comments and observations relating to the robustness of the design review process established by the Applicant in order to secure the highest possible design quality.</p>	<p>In relation to the answer to ExQ1 DES 1.2 (REP2-051), the ExA asked the Applicant where feedback from its Design Review Panel sits in relation to the Independent External Design Review and whether the Panel's remit will be to give design feedback.</p>	<p>Jo Phillips set out on behalf of the Applicant that the Design Review Panel will have the ability to give design feedback on any OnSS building design and that the Applicant has undertaken early engagement with the Panel, including a workshop and site visit and that the discussion with the Panel is worthwhile and challenging and will ensure that opportunities for good design are maximised where there is flexibility.</p> <p>Jo Phillips explained that engagement with the Design Review Panel is an on-going process with the relevant design documents being "live" rather than "fixed".</p>
<p>3.3</p>	<p>The ExA asked LCC about its response to ExQ1 DES 1.5 (REP2-069) and the LCC's position on the substation forming a standalone piece of good quality architecture. Neil McBride, Head of Planning for LCC and Kevin Gillespie, LCC's landscape architect, set out</p> <ul style="list-style-type: none"> a. LCC's position on the Design Panel's role and continuing engagement; b. LCC's view that seeking to screen the substation with trees in an otherwise open area may look "odd" and that instead of relying on screening the structure could be an architectural feature; and 	<p>HPKC on behalf of the Applicant,</p> <ul style="list-style-type: none"> a. Clarified that in reference to LCC's reference to "a building", there may not be an individual large building as such (should AIS technology be used) b. Regarding any concern of LCC's about relevant design and landscaping, the approval mechanisms within Requirements 9 and 10 of the dDCO (REP2-007) are such that these are matters which sit within the control of the relevant authority at the detail design stage. <p>Jo Phillips set out that</p>

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	<p>c. LCC's view that it would be content to be the discharging Authority for Requirements 9.</p>	<p>a. The Applicant would welcome input from the Design Panel, LCC, the Community Liaison Group as well as the wider community to ensure the Applicant draws on the opinions of all those who will live with the design in years to come.</p> <p>b. In relation to landscape character, Jo Phillips set out that the present lack of natural habitats should not lead to a conclusion that the landscape should remain open rather than be enhanced in terms of landscape character, visual amenity and ecology.</p> <p>In relation to LCC's follow-up point that having a substation building sit comfortably in the environment rather than being blocked by planting, should this be achieved, HPKC noted that the questions of screening and design require to be considered carefully at the next stage of detailed design, where there is adequate control via the above-mentioned Requirements. This allowed the discharging authority to consider those two matters together in order to determine whether the overall combination of detailed design and landscaping was acceptable.</p>
3.3	<p>The ExA turned to DES 1.6 which it asked the Applicant to update on the basis of, among other things, Advice Note 15 which appeared to be erroneously referred to.</p>	<p>The Applicant agreed to do so by Deadline 3.</p>
<p>3.4 Seascape and Visual Effects</p>		
3.4 Seascape effects of ORCP and	<p>The ExA referred to ExQ1 SV 1.5 and 1.6 and the Applicant's technical review of the parameters of the Offshore Reactive Compensation Platform ("ORCP")</p>	<p>Greg Tomlinson, the Applicant's Offshore Consents Manager, and Simon Myers, Landscape Architect and SLVIA specialist for the Applicant and a consultant working for OPEN part of SLR Consulting, set out that the Applicant did not wish to pre-judge the</p>

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related mitigation	Maximum Design Scenario and asked if the Applicant could expand on this.	outcome of the engineering review which is looking at the size of the structure which would affect the maximum height of masts and antenna.
3.4 Seascape effects of ORCP and related mitigation	The ExA asked about ExA1 SV 1.7 and how the commitment for low lighting intensity is secured.	Greg Tomlinson set out that a more detailed ORCP Lighting Management Plan would be set out at deadline 4. HPKC added that this would include means within the dDCO of securing it.
3.4 Seascape effects of ORCP and related mitigation	The ExA asked whether the updates to the Design Approach Document and Design Principles Statement to include offshore infrastructure would include provision for future design review.	Greg Tomlinson set out that it would be premature to set out what these updates would include but that an update would be provided at Deadline 4.
3.4 Seascape effects of ORCP and related mitigation	ExA asked about opportunities for stakeholders to input into ORCP design.	<p>Greg Tomlinson set out that stakeholder input is in mind in relation to these updates and that ORCP future design details would be open to consultation.</p> <p>Mr Tomlinson noted though that as offshore infrastructure they will be primarily functional and safe so design would be engineering led, but the commitment to include them in design documents was with consultation and good design in mind.</p>
3.5 Historic Environment		
3.5 Baseline assessment, archaeological field evaluation and	<p>The ExA asked LCC a series of questions regarding the adequacy of assessment undertaken to date.</p> <p>In response LCC set out its position that:</p> <ol style="list-style-type: none"> a. The wording of Requirement 17 was insufficient and wording similar to that seen in the made 	HPKC explained that all of the proposed Biodiversity Net Gain (“BNG”) planting is within the red line boundary. This should not be conflated or confused with the separate discussions taking place with third parties about possible contributions to BNG efforts elsewhere. The latter are matters sitting outside the DCO as such, and not in response to any legal or policy requirement. These wider

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mitigation	<p>Mallard Pass DCO Requirement 10 would be preferred;</p> <ul style="list-style-type: none"> ▪ The level of trial trenching was not sufficient <p>Aerial photographic assessment was required</p> <p>Historic England (“HE”) set out its position including a query about the correct version of Requirement 17.</p>	<p>opportunities to contribute to BNG are not matters which the Applicant invites the ExA and Secretary of State to rely on for the purposes of decision making.</p> <p>HPKC then responded to HE’s query by clarifying the correct version of Requirement 17 and summarised the drafting of the Requirement:</p> <ol style="list-style-type: none"> a. within the first paragraph, no stage of the onshore transmission works may commence until the Written Scheme of Archaeological Investigations (“WSI”) is in place, which must accord with the outline WSI (“oWSI”) and be informed by the archaeological investigations referred to in subparagraph two for the relevant stage; b. within the second subparagraph, the archaeological investigations as part of the onshore preparation works must take place in accordance with a specific WSI which must accord with the oWSI which has been submitted to and approved by LCC in consultation with relevant planning authority; and c. within the third part of the Requirement, all the archaeological investigations other than those in subparagraph two have to be carried out with a WSI approved under sub paragraph one. <p>Charlotte Dawson, the Applicant’s Archaeology and Cultural Heritage Lead a Principal Consultant at SLR Consulting, set out the Applicant’s position on the baseline field evaluation and analysis making clear the work undertaken by the Applicant:</p>

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		<ul style="list-style-type: none"> a. The EIA footprint of geophysical survey was guided by deposit modelling to descope certain areas east of historic coastlines or with poor depositional environments; 60% of the Order Limits scoped in were surveyed at EIA; b. The geophysical survey assisted in identifying all potential EIA impacts and their significance which has been presented in table 20.9 of AS1 048. c. Since ES submission, further geophysical surveys have taken place resulting in 88% of the area scoped in being surveyed . Additional areas of potential archaeology identified concur with Table 20.9, verifying the robustness of the baseline presented at EIA. d. Trial trenching has begun this year, informed by a WSI approved by LCC and LCC has been provided with access for in-person monitoring and given results through written reporting. e. The archaeology recorded in trial trenching undertaken has concurred with the impacts identified in the EIA and all such impacts are capable of mitigation in accordance with the oWSI and the field work referenced in the oWSI will be undertaken through a WSI approved by LCC itself. f. The results of this year's trial trenching have been provided to LCC and will be provided into the Examination at Deadline 4. <p>Charlotte Dawson further set out on behalf of the Applicant that in the two areas of the Order Limits where mitigation in situ is not possible – the Transition Joint Bays and OnSS – trial trenching has</p>

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		<p>already confirmed that there will not be any significant impacts. For all other areas, archaeology of high enough significance can be subject to mitigation in situ provided through the oWSI and WSI.</p> <p>Charlotte Dawson made clear that trial trenching would determine which of the suite of mitigation options set out in the oWSI would be used' ie that trial trenching will allow final mitigation measures to be designed in accordance with the oWSI.</p> <p>Charlotte Dawson set out the Applicant's position on aerial photography: that use of every technique was not necessary to obtain a sufficient baseline but that the Applicant has done some aerial assessment including LIDAR assessment which included an aerial photography review of full Google Earth imagery for the Order Limits, full review of project-commissioned satellite imagery, and a sample review of Historic England historic imagery, which confirmed that full assessment was not needed to complement the baseline assessment already collected via geophysical survey and deposit modelling. It would be unusual to undertake aerial photographic analysis after geophysical survey given the latter provides greater clarity</p>
3.5	The ExA asked the Applicant about the LCC's position on the wording of Requirement 17 and whether an "additional stage" was required.	<p>HPKC, made the following additional submissions as to the Applicant's position on Requirement 17:</p> <ul style="list-style-type: none"> a. the Requirement, as drafted, anticipates an on-going iterative process of archaeological investigation until works take place; b. the requirement includes explicit provision for further investigation which will inform finalisation of the WSIs,

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		<p>which would lead to identification of the mitigation measures ultimately put in place.</p> <p>c. The trial trenching informs the oWSI and will continue all the way through the project.</p> <p>Regarding the proposed inclusion of a further step in the Requirement to require the Applicant go to the relevant authority and seek approval for further trial trenching, HPKC submitted that this was not necessary because:</p> <ul style="list-style-type: none"> a. if the Applicant goes forward with an oWSI without having first agreed the approach to trial trenching with the discharging authority, it must accept the risk that its application may be refused by reference to that factor. b. Therefore, the existing Requirement already ensures that it in the Applicant's interest to engage adequately with the discharging authority ahead of submission, or risk refusal; c. LCC could refuse to approve the submitted scheme if it took the view that it did not have enough information to determine its acceptability because it judged that further trial trenching was necessary; d. If the application to approve the WSI was refused then that stage of the works cannot continue until the Applicant either does the necessary work to overcome LCC's concerns or appeals to an independent party to resolve the dispute; e. Hence the solution to the issue exercising LCC is already in the Requirement and to add in another step is entirely unnecessary.

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3.5	The ExA asked the Applicant about on-going engagement with LCC	Charlotte Dawson on behalf of the Applicant set out that that email and telephone correspondence with LCC has continued on a weekly basis as works have been carried out (other than in periods of standstill due to bad weather) and that the LCC has undertaken three visits to the works and a final progress report on trial trenching will be provided in the next few weeks with a formal submission into Examination at Deadline 4.
3.5	<p>LCC reiterated its position on the need for changes to Requirements 17 and referred to the Applicant having stated that there is not enough trial trenching to understand the level of harm and mitigation requirements.</p> <p>The ExA asked parties to discuss the drafting of Requirement 17 together outside the Examination .</p>	<p>HPKC indicated that the Applicant was content to discuss the drafting with LCC and others where possible and report back at Deadline 4 but made clear that LCC's suggested characterisation of the Applicant's evidence was inaccurate, and revealed a significant misunderstanding on LCC's part of both the evidence and the draft Requirement to which it relates. It was important to correct this to ensure that LCC's approach to future discussions was not based on a misapprehension:</p> <ol style="list-style-type: none"> a. The oWSI already identifies the menu of mitigation measures, and so the need for further investigation does not relate to uncertainty as to what measures should be identified at this stage, but simply which of the menu of mitigation measures should be employed in specific instances at the detailed works stage. That process of detailed development of the mitigation informed by further investigatory work post consent is what the Requirement expressly provides for, consistently with Ms Dawson's evidence. LCC's suggestion that in some way Ms Dawson's acknowledgment of the need for that process to determine at the detailed stage which measures would be appropriate

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		<p>in specific cases implied that there was a need for an additional interim trial trenching provision to be added to Requirement 17 was not just inaccurate but also misconceived.</p> <p>b. It is also clearly wrong and inconsistent with Ms Dawson's evidence to suggest that there is not enough information to undertake a properly informed assessment at this stage.</p>
3.6 Traffic and Transport		
3.6 Traffic and Transport	<p>The ExA asked the Applicant to explain use of A and B class roads by Construction Traffic; their usage in the summer; and their use in the vicinity of the coastal areas and potential conflict with other non-motorised users.</p> <p>In doing so the ExA referred, among other things, to ExQ1 TT 1.2 and the LCC LIR discussion of the issue and the Applicant's response.</p>	<p>Daniel Moran, Associate Consultant at SLR and the Applicant's Traffic and Transport Lead, set out on behalf of the Applicant, that:</p> <ol style="list-style-type: none"> a. Construction access roads were decided via desktop review followed by site visits in which the Applicant reviewed receptors, sought to minimise impacts including on local roads and settlements, as set out in AS1-086. Impacts on sensitive receptors and the use of local roads were minimised as much as possible; and swept path analysis checks were carried out on the types of vehicles required. b. Areas where highway improvements may be required have been considered and accepted in principle by LCC. All such improvements would be subject to a road safety audit. c. The implementation of a Construction Traffic Management Plan ("CTMP") would set out the measures to ensure safety of all road users.
3.6 Traffic and Transport	The ExA asked LCC to provide its position and the LCC set out that its submissions to date reflect the issues that locals have had regarding construction traffic not following designated routes and LCC's wish to ensure	HPKC made the following points on behalf of the Applicant:

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	<p>that there are measures to ensure that such issues do not happen again and ensure the Applicant's measures are robust and issues can be dealt with if measures are breached.</p>	<ul style="list-style-type: none"> a. The Applicant notes and welcomes LCC's acknowledgment that it did not consider there to be any material shortcoming with the EIA assessments; but b. In relation to ensuring problems are controlled and managed, Requirement 21 makes clear that the relevant Highway Authority has control over any such issue given that the Requirement ensures that the Highway Authority must approve a CTMP for each stage in accordance with outline CTMP ("oCTMP") <p>Daniel Moran set out that the Applicant's approach has followed the relevant guidance including for consideration of the cumulative scenario (the Institute of Environmental Management and Assessment Guidance for the Environmental Assessment of Traffic and Movement (paragraph 2.29).</p> <p>HPKC noted that it was for LCC to anything in the Applicant's cumulative assessment which it considered to be wrong.</p>
3.6 Traffic and Transport	<p>LCC set out that it had no concerns about what the Applicant had submitted to date but referred to issues which it has had with NSIPs increasing vehicle numbers. The LCC referred to the fact that the cumulative work does not include all future projects and the affect that would have on A roads.</p>	<p>HPKC submitted that:</p> <ul style="list-style-type: none"> a. It was helpful to hear LCC's clear statement that it had no concern about the assessments presented in the documents submitted to date which reflect the requirements under the EIA Regulations, the NPS and professional and Planning Inspectorate guidance.

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		<p>b. LCC does not appear to have disputed where the Applicant has drawn the line on what can reasonably and appropriately be assessed at present; other projects which come forward thereafter will have to undertake the same process of cumulative impact assessment when they reach relative maturity, taking into account projects coming before them and giving the decision maker the opportunity to consider those projects cumulatively at that stage. As a result, the way the assessment has been carried out is appropriate.</p> <p>Mr Chris Jenner, Development Manager, set out for the Applicant that:</p> <p>a. Going beyond what law and policy require the Applicant and other NSIPs with which it has collaborated and engaged have established the Lincs Energy Forum which has held its inaugural gathering. Its Terms of Reference and quarterly meetings are being established.</p> <p>b. As seen in the Inter-relationship Report, the Applicant is the most progressed of potential and emerging local schemes. The Lincs Energy Forum and collaboration with less mature projects can have a great benefit in ensuring that the cumulative impacts can be reduced, minimised and mitigated appropriately, particularly in respect of traffic and transport.</p>

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		<p>c. The forum will act as a mechanism for data sharing and enabling project design to be influenced by each other and to work together with LCC and LPAs.</p>
3.6 Traffic and Transport	The ExA enquired about Figure 11 on APP-218	The Applicant confirmed that the background image was missing from the figure and confirmed it would respond at Deadline 3 to correctly reflect what the figure should show and also do a thorough check of other figures within the document as requested by the ExA.
3.6 Traffic and Transport	The ExA asked about the crossing of Fosdyke Bridge (PDF page 2 of APP-218) and the extent to which weight restraints has been considered	Daniel Moran set out on behalf of the Applicant that the finalised route was still in discussion with the Highway Authority and detailed investigations would need to be undertaken for issues such as structural assessment at a later stage.
3.6 Traffic and Transport	The ExA referred to the fact that the Abnormal Load Assessment Report (oCTMP, APP-289, paragraph 95) was to be provided post-consent and queried the outcome should Fosdyke Bridge not be able to carry the necessary load.	The Applicant set out that the route was indicative, other routes would be explored and that assessment will define the best route available at a later date after detailed design and selection of technology.
3.6 Traffic and Transport	The ExA stated its concern regarding the assessment of the impact	The Applicant agreed to consider this issue in writing.
3.6 Traffic and Transport	The ExA asked about where within the Outline Public Access Management Plan the King Charles III England Coast Path has been taken into sufficient account.	The Applicant agreed to consider this issue in writing. The Applicant also agreed to consider the question of Natural England consent in relation to this Public Right of Way in response to discussion of this with the ExA.

3.7 Onshore Ecology and Ornithology

Agenda Item	ExA Question / Context for discussion	Applicant's Response
<p>3.7 Updates on progress on outstanding issues identified by Natural England</p>	<p>The ExA referred to the Natural England Risk and Issues Log and asked about on-going dialogue to resolve issues</p>	<p>Stephanine Boocock, Ecologist, SLR, set out on behalf of the Applicant that throughout the process the Applicant has sought to engage with Natural England. On ecology matters, the Applicant has received Letters of No Impediment on required species and taken into account Natural England views on matters.</p> <p>More generally, Andy Gregory, EIA Lead Technical Director, SLR Consulting set out on behalf of the Applicant that within the Log there are certain issues listed as amber and red which the Applicant believes should now be green including those raised by Stephanie and a range of issues which the Applicant believes are now closed out.</p> <p>Dr Gregory further discussed the range of Log actions and made clear that the Applicant is working through the Log, engaging where possible and working through the issues. The Applicant will update the risk log at future deadlines as appropriate.</p>
<p>3.7 BNG</p>	<p>The ExA asked, in relation to HOE 1.16, whether there would be any implication for BNG for the removal of arable field margins from the Outline Landscape and Ecological Management Strategy (“OLEMS”)</p>	<p>Having clarified its understanding of the question, the Applicant stated that it would consider this and provide a response at Deadline 3.</p>
<p>3.7 BNG</p>	<p>The ExA referenced (1) the LCC's position that 10% BNG should be delivered; (2) the Applicant's exploration of opportunities for off site BNG and requested an update on the Applicant's work.</p>	<p>Chris Jenner, on behalf of the Applicant set out that the discussion regarding BNG opportunities at Frampton Marsh are on-going and the Applicant continued to engage on how these options can be formalised.</p>

Agenda Item	ExA Question / Context for discussion	Applicant's Response
3.7 BNG	<p>In response to the ExA, LCC stated that its position is that it believes there are opportunities for the Applicant within and beyond the cable corridor. LCC raised a concern that quantification on BNG requires habitat surveys which need to be carried out in the summer months and therefore cannot be concluded within the Examination period.</p>	<p>Chris Jenner set out that there were additionally on-going discussions with other landowners.</p> <p>On behalf of the Applicant,</p> <ol style="list-style-type: none"> a. HPKC submitted that the context for discussion of this issue is that there is no legal or policy foundation for a development of this sort to deliver a particular percentage of BNG. The Applicant's written materials explain how it has complied with what is required in policy terms in respect of BNG. It should be apparent, therefore, that LCC's concerns regarding the surveys required to address a percentage gain proceed from a false premise: there is no need for a numerical analysis of BNG in this case. So far as the Applicant is looking for offsite options these are not things that could properly be required within the DCO on the basis of the current legal and policy position. b. Bob Edmonds, BNG Lead, SLR Consulting, confirmed that, in respect of surveys, all of the onshore baseline surveys which are required for the purposes of the application have been completed and embedded; c. Chris Jenner set out that, on the question of collaboration, the Applicant has had regularly monthly meetings with LCC to discuss – among other things – BNG and the Applicant will continue to work closely with LCC when other BNG opportunities are further developed with potential partners.

Agenda Item	ExA Question / Context for discussion	Applicant's Response
3.7 BNG	<p>The ExA asked the Applicant whether it was aware of NSIPs which had committed to percentage BNG in response to the LCC's discussion of such projects.</p>	<p>On behalf of the Applicant, HPKC made the following submissions:</p> <ul style="list-style-type: none"> d. that there was a distinction between seeking opportunities to achieve Net Gain and the obligation to deliver a percentage Net Gain and that the NPS – the policy against which the Application must be determined – is concerned with the former. The question of what is secured in BNG terms within the DCO is a question of how the specific proposed biodiversity measures are secured – for instance, how is planting secured in the dDCO if BNG is secured via planting; e. Requirements should only be imposed where they meet the relevant policy tests which include, importantly here, the test of necessity, which would be tested by whether the development would be acceptable in the absence of a requirement. f. Insofar as other DCOs include a requirement to achieve a particular percentage BNG, it would be necessary to examine very closely the extent to which any such requirement had been examined against the tests for the imposition of a requirement. Their precedent value would need to be judged in the light of that examination. <p>Bob Edmonds set out on behalf of the Applicant the constraints of delivering a percentage net gain including that the red line boundary for the cable corridor is a maximum design scenario, creating issues with delivery not seen in, for instance, solar farms</p>

Agenda Item	ExA Question / Context for discussion	Applicant's Response
		which have a recognised footprint from an early stage. At detailed design stage quantum may be confirmed.
3.7 BNG	In response to questions, LCC cited particular NSIPs which include a percentage BNG requirement.	The Applicant set out that it would look at what had been said in the decision documents and elsewhere as to the necessity of such Requirements in other DCOs.
3.8 Land Use, Geology and Ground Conditions		
3.8 ALC Classifications	The ExA noted the Applicant's response to LU1.7 and asked the Applicant to clarify why, if providing ALC surveys before construction, it has not done so by this stage.	Jason Gale, the Soils Lead and Regenerative Agricultural Lead at SLR, set out that the Applicant has committed to carrying out such surveys prior to construction in the Soil Management Plan ("SMP") but that site-specific surveys are not necessary to inform EIA as opposed to construction.
3.8 ALC Classifications	The ExA asked whether, should the surveys be conducted at some stage, they shouldn't be conducted now.	<p>HPKC submitted behalf of the Applicant that</p> <ol style="list-style-type: none"> a. As a matter of general approach, it does not follow that just because something will need to be done at some stage it is necessary for it to be done now (whether to provide an adequate ES or otherwise). b. A conservative approach to ALC classification has been taken ensuring the assessment is at least adequate for understanding the ALC Likely Significant Effect in EIA terms, and for informing the contents of the outline Soil Management Plan. c. The pre-construction ALCs survey serve a different purpose to this. They will inform the specific measures to be employed at specific locations along the onshore route at the construction stage.

Agenda Item	ExA Question / Context for discussion	Applicant's Response
3.8 ALC Classifications	The ExA asked Applicant to confirm whether pre-construction surveys identified in 2.4 on the outline SMP (PD1-040) would be undertaken prior to final SMP.	The Applicant confirmed that this was the case.
3.8 ALC Classifications	The ExA asked the Applicant whether it had any comment on the LCC's position which had been stated by Mr Sam Franklin as the LCC concurring with Natural England's position that the applicant's approach was not sufficient in the absence of detailed surveys.	HPKC confirmed that the Applicant believes its position has been sufficiently articulated in the written material and oral submissions made to date, subject to the ExA asking it any further questions in writing in due course.
3.8 ALC Classifications	The ExA asked in relation to TH Clement's response to LU1.12, whether surveys will identify the matters set out by TH Clements including the potential for multiple soil horizons.	The Applicant set out that it had committed to providing such information to landowners on an individual basis.
3.8 ALC Classifications	TH Clements set out, among other things, the on-going engagement with the Applicant on the SMP.	The Applicant confirmed that it was grateful for the engagement which will assist with crystallising the issues in the SMP and confirmed that the SMP would be updated at Deadline 4.
3.8 ALC Classifications	The ExA referred to the Rampion Two project providing the cumulative effects on BMV land at national and regional scale and asked whether the Applicant could also do so.	The Applicant agreed to do so by Deadline 4.
3.8 Working width of the cable corridor	ExA referred to LU 1.4 and asked what input from landowners and tenants the Applicant has had on the cable corridor working width.	David Wright, on behalf of the Applicant, set out that consultation has been done in close co-operation with landowners taking into account current land use (such as relevant tramlines and cropping) and this process will be conducted again as the corridor width is reduced. Should landowners identify particular issues the Applicant can seek to microsite around them.

Agenda Item	ExA Question / Context for discussion	Applicant's Response
3.8 Working width of the cable corridor	In response to the ExA's discussion of LU 1.4 and cable corridor width, TH Clements reiterated its positions on (1) how soil storage areas been calculated and (2) how the width of corridors for those areas which are subject to trenchless techniques can be justified.	HPKC referred back to the discussion in CAH1 and set out that his instructions were that the Applicant was happy to take these matters away to consider them.
3.8 Working width of the cable corridor	The ExA discussed the question of multiple soil horizons, in relation to PD1-071 page 400, and whether this could lead to changes in working width	David Wright for the Applicant set out that the three soil horizons have been accounted for in the figure discussed and that further information will be set out in the outline SMP to be submitted at Deadline 3.
3.8 Cable burial depth	The ExA referred to LU 1.17 and asked about the basis for the Applicant's assumptions related to boreholes and trial pits.	David Wright for the Applicant set out 2023 borehole surveys were undertaken for those areas where trenchless techniques were being used and some additional areas to fill the gaps and to provide full coverage across the route. Subsequent surveys were carried out 2024 to fill in the gaps, forming a total of 56 boreholes along the cable route which were representative of the entire cable corridor and which the Applicant committed to providing at Deadline 3.
3.8 Cable burial depth	The ExA noted that the Applicant would be responding to TH Clements' Written Representation points regarding cable depth and asked whether parties wished to raise any points at this stage	David Wright on behalf of the Applicant stated that it would be best to respond in writing in detail.
3.8 Cable burial depth	LCC set out in response to the ExA's questions that it appeared that the Applicant was "on" the issue and pointed out that there were occasions where there was justification for cables being deeper than normal.	David Wright on behalf of the Applicant set out that what is being done by the Applicant went beyond the industry standard for UK transmission standards of 0.9 metres depth (per paragraph 4.2 of Energy Networks Association, Engineering Recommendation G57. Issue 2, 2019 clause 4.2) but that the Applicant has agreed to a

Agenda Item	ExA Question / Context for discussion	Applicant's Response
3.8 Ground stability and Earth movement	The ExA referred to NPS EN-5 2.3.2 which requires that electricity networks infrastructure be resilient to drought and flood and asked how the Applicant had addressed these requirements.	<p>cable depth of 1.5 metres given the farming practices in Lincolnshire.</p> <p>Jason Gale set out for the Applicant that:</p> <ul style="list-style-type: none"> a. there are specific instances from the winter of 2023-2024 which were noted as the 8th wettest winter in history and included machinery sinking and rutting. Though climate change could increase the regularity of these events, it has been proven through landowner discussion and site visits that normal agricultural activities have been able to continue in such extremes down to 0.7 metres with no impact. b. regarding soil erosion, level land is less prone to erosion, but silts are especially prone due to a range of factors. For the loss of soil through erosion to reduce soil depth to 750cm would require a loss of 9 cm of soil per year over 50 years. Given the average global soil loss through erosion is 0.3 to 0.7mm per year, without taking into consideration the natural regeneration of soil, there doesn't appear to be any specific impact on soil erosion.
3.8 Ground stability and Earth movement	The ExA referenced the fact that the Flood Risk Assessment (" FRA ") includes a 20-25% uplift in peak rainfall related to climate change and referenced the NPS EN-5 requirement of consideration of the climate change in terms of earth movement and subsidence caused by flooding or drought on underground cables and asked whether the NPS EN-5 requirement's consideration of	The Applicant agreed to confirm its response in writing at Deadline 3 but set out initially that the FRA assumption is applicable to summer or winter but that, in relation to winter, the level of rainfall referred to would result in the soils already being saturated and cannot therefore become more saturated. And hence there will be no greater risk to earth movement or subsidence for the underground cable corridor

Agenda Item	ExA Question / Context for discussion	Applicant's Response
	<p>climate change on underground cables has been taken into account in the FRA's 20-25% uplift.</p>	
<p>3.8 Agricultural Drainage</p>	<p>In response to the ExA's request for them to do so, TH Clements gave a high-level summary of its position on agriculture drainage by reference to LU 1.18.</p>	<p>David Wright on behalf of the Applicant responded to the three points TH Clements had raised:</p> <ul style="list-style-type: none"> a. a local drainage expert is employed by the Applicant to understand the drainage schemes and the Applicant and the expert are fully aware that jetting requires to be maintained b. regarding deep drainage, the Applicant has agreed to site its infrastructure below existing drainage schemes where possible which will be set out in the CoCP c. regarding removal of old schemes, the Applicant's view is that this is not normal and the Applicant has found via excavations that old schemes continue to be in situ and so would intend to follow the normal process and leave the old scheme in situ but this issue can be picked up in on-going discussion with TH Clements.
<p>3.8 Severance</p>	<p>The ExA referred to severed land and the responses to LU1.5 in which Interested Parties (particularly TH Clements) had queried whether full management plans for severed areas have been provided by the Applicant.</p>	<p>David Wright set out on behalf of the Applicant set out that the assessment undertaken to date is the Applicant's initial assessment of severed land based on the full maximum design scenario and that when it has final design, the Applicant would be going to landowners to agree severed land.</p> <p>Mr Wright clarified that the "severed land management plan" is not a management plan from a DCO perspective but rather a plan agreed between parties.</p>

Agenda Item	ExA Question / Context for discussion	Applicant's Response
3.8 Severance	The Applicant was asked to provide any initial comments on the information provided by TH Clements on severed land.	David Wright set out that though the Applicant has only carried out an initial assessment of it, TH Clements severed land plans appear similar to those considered by the Applicant at initial assessment stage so it appears that both parties are on a similar page but this will form part of ongoing discussions
3.8 Dust contamination	The ExA asked for TH Clement's and LCC's views of the issue of dust contamination and then invited the Applicant to provide any response. LCC confirmed that it was so far content with the position on the Air Quality Management Plan ("AQMP") but the ExA took an action to confirm this with South Holland District Council (DC), East Lindsey DC and Boston Borough Council (" the District and Borough Councils ")	<p>HPKC explained that on the basis of the constructive discussion between parties, the Applicant would hold back on amplifying its written submissions in this hearing. There would be an opportunity to say more in due course if required following completion of the discussions that were taking place.</p> <p>Regarding the District and Borough Councils' position on the AQMP, HPKC referred to the position set out within the District Councils' SOCG which appeared to record the position as being agreed.</p>
3.8 Stone contamination	The ExA raised the issue of stone contamination and referred to LU1.11 and invited comments from the Applicant and TH Clements.	The Applicant set out that it was content to defer the matter on the basis of on-going discussion with TH Clements.
3.8 Soil heating	The ExA asked whether the Applicant and TH Clement's had any further points regarding the issue of risks to cable heating or crop yield. TH Clement's stated that it would respond to the Applicant's position on LU1.16 but additionally set out some further information regarding its concerns.	<p>The Applicant set out that it would also respond in writing. Jason Gale provided a brief point on the issue at this stage, noting in relation to TH Clement's point regarding the comparability of papers cited with the crops farmed by TH Clement's that the most reliable research at present was from University of Freiburg who have used similar crops to TH Clements' with no significant impact.</p> <p>HPKC stated that the specific concern is understood and the question whether the effect in question is likely to occur is addressed in the Applicant's written evidence.</p>

Agenda Item	ExA Question / Context for discussion	Applicant's Response
3.8	TH Clements raised that it would require the Applicant's help in relation to "identify and source" papers which the Applicant had referred to in LU 1.16.	<p>Following the Hearing, the Applicant has provided the below full titles for each of the papers cited:</p> <ul style="list-style-type: none"> a. Ahl, C, et al, Underground cable routes: Interim report after three years of experimental field operation Reinshof (2023), Erich Schmidt Verlag GmbH & Co, Berlin. b. Bruggmann, J, et al, Heat dissipation of high voltage cable systems – a technical and agricultural study (2015), 9th International Conference on Insulated Power Cables. c. Feldwisch, C, et al, Soil properties and agricultural income on the ALEGrO underground cable route (2024), Erich Schmidt Verlag GmbH & Co, Berlin.
3.9 Actions arising from the Issue Specific Hearing		
3.9	The ExA set out the following actions which were then discussed where necessary and have since been provided by the ExA in EV7-010.	The Applicant's responses to each action requested at Deadline 3 have been provided as signposted in the Applicant's Deadline 3 Cover Letter (Document 20.1) and as discussed below..
3.10 Any other matters arising		
3.10	The ExA invited any other matters arising	The Applicant confirmed it had no such matters.
3.10	LCC raised its preference for future Hearings to involve in-person attendance.	The Applicant confirmed that it had booked a venue for hearings in the new year should they be required.
4. Next Steps		
4	The ExA requested written summaries of hearing contributions	The Applicant provides its summary in this document
5 Closing		
5	The ExA confirmed the cancellation of ISH4 and closed the meeting.	

3 Action Points

Action No	Description	Applicant's comment/where has the action been answered
2	Provide confirmation of the intended Advice Note to be referenced in ExQ1 DES 1.6. Also, to map the steps it has taken along its design process so far to the steps in the Advice Page on Good Design illustrated by the Good Design process diagram in its revised response. (D3)	The Applicant's response on this point is set out in Document 20.6 The Applicant's Response to Action Points 2, 7, 9 of ISH3 and Correction to LV 1.4 Response
3	Provide a Lighting Management Plan for the Offshore Reactive Compensation Platform (ORCP) and set out how this Plan would be secured within the dDCO. (D4)	This information will be provided in due course as requested.
4	Discuss the potential for further amendments to the wording of R17 of the dDCO and the Outline Written Scheme of Investigation to address LCC's concerns (D4)	This action will be carried out in due course as requested.
5	Provide a written response updating the abnormal indivisible load (AIL) Swept Path Analysis document as appropriate [APP-218]. (D3)	The Applicant's response on this point is set out in 6.3.27.1 Chapter 27 Appendix 1 Transport Assessment Annex A Special Order AIL Swept Path Analysis
6	Respond regarding the need for environmental assessment of an alternative routes should the indicative route for AIL not be possible considering other structural parameters (D3 and D4 if further work required)	The Applicant's response on this point is set out in Document 20.13 Clarification note: AIL Alternative Routes
7	Respond to LCC's comments in ExQ1 TT 1.7 [REP2-069] regarding the Public Rights of Way and Outline Public Access Management Plan (PAMP). (D3)	The Applicant's response on this point is set out in Document 20.6 The Applicant's Response to Action Points 2, 7, 9 of ISH3 and Correction to LV 1.4 Response
8	Respond to LCC's note in relation to [REP2- 042] that the coastal path (King Charles III England coast path) may be affected by landfall works and is considered in the Outline PAMP and comment on the consenting process that may be required. (D3)	The Applicant's response on this point is set out 20.14 Clarification Note: King Charles III England coast path & other rights of way. The Applicant has also updated 6.3.3.2 Onshore Crossing Schedule in light of this.
9	Comment on whether the removal of the provision for the creation and enhancement of	The Applicant's response on this point is set out in

Action No	Description	Applicant's comment/where has the action been answered
	arable field margins from the outline Landscape and Ecological Management Strategy (as reported in the Applicant's response to ExQ1 HOE 1.16) would result in Biodiversity Net Gain (BNG) implications. (D3)	Document 20.6 The Applicant's Response to Action Points 2, 7, 9 of ISH3 and Correction to LV 1.4 Response
10	Review BNG percentages required in recent made DCOs (D4)	This action will be carried out in due course as requested.
11	Provide an equivalent assessment to that submitted for the Rampion 2 project in relation to consideration of the cumulative effects at a national and regional scale of the loss of best and most versatile land (D4)	This action will be carried out in due course as requested.
12	Submit an updated document to reference the three separate soil horizons.	The Applicant has carried out this action within its Outline Soil Management Plan (8.1.5) submitted at this deadline.
13	In relation to the Applicant's response to ExQ1 LU 1.17, submit a plan indicating the locations of the borehole and trial pit surveys that have been undertaken (D3)	The Applicant's response on this point is set out in Document 20.10 Clarification Note: Borehole Locations Plan
14	Respond to the TH Clements & Son Limited Written Representation [REP1-050] in relation to cable depth (D3)	The Applicant's response to Written Representation (document 20.3) provides this response.
15	The Flood Risk assessment of the ECC and 400kv corridor applies a 25% uplift allowance for peak. Provide confirmation that this has been applied in the context of peak rainfall as required in National Policy Statement EN-5. (D3)	The Applicant's response to this point is set out in Document 20.8.
18	Provide results of the archaeological trial trenching	This information will be provided in due course as requested.
19	Soil Management Plan to be updated to consider feedback from TH Clements (D4 for Applicant)	Noting the deadline for TH Clements feedback (D3), this information will be provided by the Applicant in due course as requested.