

Norfolk Vanguard Offshore Wind Farm Consultation Report



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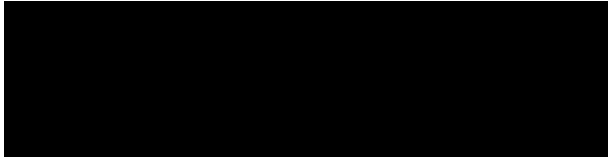
June 2018

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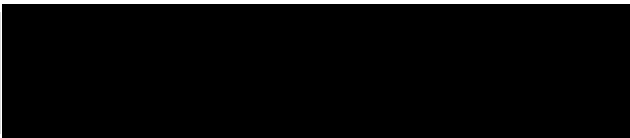
Signed:



For and on behalf of Norfolk Vanguard Limited

Approved by: Ruari Lean, Catrin Ellis Jones

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Glossary of acronyms

AONB	Area of Outstanding Natural Beauty
CAAV	The Central Association of Agricultural Valuers
CLA	Country Land and Business Association
DCLG	Department for Communities and Local Government
DCO	Development Consent Order
EA	Environment Agency
EAOW	East Anglia Offshore Wind
EIA	Environmental Impact Assessment
ES	Environmental Statement
ETG	Expert Topic Group
EU	European Union
HDD	Horizontal Directional Drilling
HE	Historic England
HRA	Habitat Regulations Assessment
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
IP	Interested Party
kV	Kilovolt
LLO	Local Liaison Officer
LVIA	Landscape and Visual Impact Assessment
MCZ	Marine Conservation Zone
MOD	Ministry of Defence
MoU	Memorandum of Understanding
MW	Megawatt
NALEP	New Anglia Local Economic Partnership
NETS	National Electricity Transmission System
NFU	National Farmers Union
NPS	National Policy Statement
NV East	Norfolk Vanguard East
NV West	Norfolk Vanguard West
OWF	Offshore Wind Farm
PEI	Preliminary Environmental Information
PEIR	Preliminary Environmental Information Report
PEXA	Practice and Exercise Area
PINS	The Planning Inspectorate
PRoW	Public Right of Way
SAC	Special Area of Conservation
SCI	Site of Conservation Importance
SoCC	Statement of Community Consultation
SPA	Special Protection Area
SPR	ScottishPower Renewables
VWPL	Vattenfall Wind Power Ltd

Glossary of Terminology

2008 Act	The Planning Act 2008 - An Act to establish the Infrastructure Planning Commission and make provision about its functions; to make provision about, and about matters ancillary to, the authorisation of projects for the development of nationally significant infrastructure; to make provision about town and country planning; to make provision about the imposition of a Community Infrastructure Levy; and for connected purposes.
Array cables	Cables which link the wind turbine generators and the offshore electrical platform.
Cable Relay Station	Primarily comprised of an outdoor compound containing reactors (also called inductors, or coils) and switchgear to increase the power transfer capability of the cables under the HVAC technology scenario as considered in the PEIR. This is no longer required for the project as the HVDC technology has been selected.
Constraints Mapping	GIS desk-based exercise where a range of environmental data sets within a defined study area are mapped and buffers applied to aid in the process of selecting siting options for onshore electrical infrastructure.
Interconnector cables	Buried offshore cables which link the offshore electrical platforms.
Land Agent Working Group	Set up by for and on behalf of the landowners
Landfall	The location where the offshore cables are brought ashore and jointed to the onshore cables within underground transition pits. The landfall has been selected at a search area south of Happisburgh.
Landfall compound	Compound at landfall within which Horizontal Directional Drilling (HDD) drilling would take place.
Mobilisation zone	Area within which the mobilisation area will be located.
National Grid substation extension	The permanent footprint of the National Grid substation extension.
Necton National Grid substation	The existing 400kV substation at Necton, which will be the grid connection location for Norfolk Vanguard.
Offshore accommodation platform	A fixed structure (if required) providing accommodation for offshore personnel. An accommodation vessel may be used instead.
Offshore cable corridor	The corridor of seabed from the Norfolk Vanguard OWF sites to the landfall site within which the offshore export cables would be located.
Offshore export cables	The cables which bring electricity from the offshore electrical platform to the landfall.
Offshore project area	The overall area of Norfolk Vanguard East, Norfolk Vanguard West and the offshore cable corridor.
Onshore 400kV cable route	Buried high-voltage cables linking the onshore project substation to the Necton National Grid substation.
Onshore cable corridor	The area from landfall to the National Grid substation which contains the buried cables as well as the temporary running track, topsoil storage and excavated material during construction.
Onshore cable route	The 45m easement which will contain the buried export cables as well as the temporary running track, topsoil storage and excavated material during construction.
Onshore cables	The cables which take the electricity from landfall to the onshore project substation.

Onshore project area	All onshore electrical infrastructure (landfall; onshore cable route, accesses, trenchless crossing technique (e.g. Horizontal Directional Drilling (HDD)) zones and mobilisation areas; onshore project substation and extension to the Necton National Grid substation and overhead line modification).
Onshore project substation	A compound containing electrical equipment to enable connection to the National Grid. The substation will convert the exported power from HVDC to HVAC, to 400kV (grid voltage). This also contains equipment to help maintain stable grid voltage.
Onshore project substation temporary construction compound	Land adjacent to the onshore project substation which would be temporarily required during construction of the onshore project substation.
The Applicant	Norfolk Vanguard Limited (a wholly owned subsidiary of Vattenfall Wind Power Ltd)
The Offshore Wind Farm (OWF) sites	The two distinct offshore wind farm areas, Norfolk Vanguard East and Norfolk Vanguard West.
The project	Norfolk Vanguard Offshore Wind Farm, including the onshore and offshore infrastructure.
Trenchless crossing zone (e.g. HDD)	Temporary areas required for trenchless crossing works.
Workfront	The 150m length of onshore cable route within which duct installation would occur.

1. EXECUTIVE SUMMARY

1.1. Purpose of the Consultation Report

1. This consultation report is intended to fulfil the requirements of section 37 of the Planning Act 2008, as amended ('the Act'). This requires Norfolk Vanguard Limited ('the Applicant'), a fully owned subsidiary of Vattenfall Wind Power Limited (VWPL), to provide a consultation report as part of its application for development consent for the Norfolk Vanguard Offshore Wind Farm ('the project'), to give details of the consultation activities that have been undertaken, the responses received to pre-application consultation and how these have informed the evolution of the project and supporting assessments.
2. This report demonstrates how the Applicant has complied with sections 42, 47, 48 and 49 of the Act, and has had regard to section 50 of the Act. A Statement of Compliance has been prepared which confirms that the Applicant has complied with all relevant provisions (See Chapter 27).
3. Consultation is an important part of the planning and development process. The Act requires developers to publicise their proposals widely as well as consult with the local community, local authorities, statutory bodies and persons with an interest in land potentially affected by the proposed Nationally Significant Infrastructure Project (NSIP). This process is referred to as 'pre-application consultation' and must be carried out before an application for a Development Consent Order (DCO) can be accepted by the Planning Inspectorate (PINS) on behalf of the Department for Business Energy & Industrial Strategy (BEIS).
4. Aligned with this duty to consult are Vattenfall's principles and approach to consultation (see Section 4.5). Throughout the pre-application consultation, the Applicant has engaged and consulted with statutory bodies, including local authorities, local communities and the general public.
5. In 2016, the Applicant was awarded an Agreement for Lease (AfL) by The Crown Estate for the seabed areas within which it will develop the project, with a proposed installed capacity of up to 1.8GW. Also in 2016 a Grid Connection Offer was received from National Grid Electricity Transmission (NGET) for the connection of 1.8GW of offshore wind generation to the National Grid Electricity Transmission System in East Anglia. The Applicant accepted this offer to connect power from the project into the national grid at the existing NGET 400kV substation near Necton in Breckland, Norfolk. The Applicant commenced informal pre-application consultation and engagement soon afterwards.

6. The project has undertaken a multi-phase approach to consultation, as is appropriate for a NSIP. Different phases of consultation have been timed to reflect key milestones in the project’s development; at points where responses could scope and inform the related assessments and help define the design of the project. This has allowed meaningful input into project development.

Figure 1 Overview of the pre-application consultation undertaken.



7. A Statement of Community Consultation (SoCC) was prepared for the project. As set out in the Act (section 47) the Applicant consulted with the relevant local authorities in respect of content of the SoCC. Having regard to their guidance and advice the SoCC was finalised and published appropriately. Thereafter, consultation was undertaken in accordance with the SoCC.
8. As well as engaging with communities and residents within the Primary Consultation Zone (PCZ) as described in the SoCC (also see map in Appendix 12.3), the Applicant also engaged with stakeholders, including relevant statutory and non-statutory consultees and the other members of the public. This engagement informed the iterative design of the project, the development of the Environmental Impact Assessment (EIA) and ensured that stakeholders were aware of project developments.
9. The consultation undertaken throughout the pre-application stage has exerted significant influence on the project’s evolution, and the Applicant is grateful to all those who have engaged with the project and responded to consultations. Many ideas, concerns and opinions expressed by consultees have directly influenced the appraisal of alternatives for the project. Even where it has not been possible to adapt the project in ways suggested by consultation responses, the Applicant has had regard to those responses and/or been able to provide the rationale for not making

the changes being sought. As well as recording the consultation responses and how they have influenced the project within this consultation report, there have also been interim consultation reports directed primarily at community consultees, notably a series of reports entitled “Hearing Your Views”, of which there have been three to date.

Table 1.1 Responses to pre-application consultation

Step in the EIA process	Relevant Section of the Act	Dates	Number of respondents	Where addressed in this report
Phase 0	N/A	March – September 2016	N/A	Chapters 9 - 11
EIA Scoping	N/A	October 2016	N/A	Chapter 7
Phase I	Non-statutory consultation with local communities	October 2016 – March 2017	788 signed in to exhibitions, 126 written responses	Chapter 12
	Non-statutory consultation with technical consultees		N/A	Chapter 12
Phase II	Non-statutory consultation with local communities	March 2017 – October 2017	830 signed in to exhibitions, 260 written responses	Chapter 13
	Non-statutory consultation with technical consultees		N/A	Chapter 13
Phase IIb	Non-statutory consultation with local communities	July 2017	Numbers attending workshop: CRS – 55 Substation – 42 Numbers attending drop-in: CRS – 60 Substation – 23	Chapter 14
Statutory Consultation	Section 42 Preliminary Environmental Information Report	7 th Nov – 11 th December 2017	77 formal statutory consultation responses to the Preliminary Environmental Information Report (PEIR) ¹	Chapter 19
	Section 47		608 signed in to drop-in exhibitions, 783 written submissions during the statutory consultation period	Chapter 20

¹ Not including responses via feedback form, which are counted in the section 47 statutory consultation numbers.

Step in the EIA process	Relevant Section of the Act	Dates	Number of respondents	Where addressed in this report
			(plus two newspaper adverts)	
Publicity Notices	Section 48		Five newspaper notices	Chapter 21
Post statutory consultation engagement	Non-statutory consultation with local communities and technical consultees	11 th December 2017 – May 2018	N/A	Chapter 25

1.2. Structure of the report

10. The below table sets out how this report is structured to comply with relevant legislation.

Table 1.2 Structure of the Report

Chapter	Title	Overview	Relevant Appendices
Chapters 1 - 3	Executive Summary and Introduction	Overview summary of the outcome of pre-application consultation and introduction to the project.	3.1 – 3.3
Chapters 4 - 7	Regulatory Context and Approach to Consultation	Approach to consultation with regard to the requirements of the 2008 Act and accompanying guidance.	4.1 – 4.3, 6.1, 7.1
Chapters 8 - 17	Non-statutory consultation (Phase 0 to Phase IIb)	Non-statutory ‘informal’ consultation conducted prior to the formal sections 42, 47 and 48 consultation and publicity stages under the 2008 Act.	8.1, 9.1- 9.26, 11.1 – 11.3, 12.1 – 12.9, 13.1 – 13.25, 14.1 – 14.9, 16.1
Chapter 18	Approach to statutory consultation under sections 42, 47 and 48 of the 2008 Act	The general approach to the statutory pre-application consultation.	N/A
Chapter 19	Formal Consultation under section 42 of the 2008 Act	What has been done to satisfy the requirements of section 42 of the 2008 Act.	19.1 – 19.17
Chapter 20	Formal Consultation under section 47 of the 2008 Act	Approach to the section 47 consultation including development of the Statement of Community Consultation (SoCC) and the methods used to consult.	20.1 – 20.15
Chapter 21	Formal Consultation under section 48 of the 2008 Act	Development and publication of the section 48 notice.	21.1 – 21.2

Chapter	Title	Overview	Relevant Appendices
Chapter 22	Summary of Responses under section 42 of the 2008 Act	On a topic by topic basis, responses received from section 42 consultees and summarises the regard that has been had to the responses in finalising the Application.	22.1
Chapter 23	Summary of Responses under section 47 of the 2008 Act	On a topic by topic basis, responses received from section 47 consultees and summarises the regard that has been had to the responses in finalising the Application.	23.1
Chapter 24	Summary of Responses under section 48 of the 2008 Act	On a topic by topic basis, responses received from section 48 consultees and summarises the regard that has been had to the responses in finalising the Application.	N/A
Chapter 25	Post-Formal Consultation Engagement	Further consultation conducted following the formal consultation in considering outstanding issues and concerns.	25.1 – 25.15
Chapter 26	Conclusion	A summary of the pre-application consultation undertaken for the project.	N/A
Chapter 27	Statement of Compliance	A full statement of compliance.	N/A

1.3. Consultation process

11. This consultation report, as required by the Act, gives details of:
 - What has been done in compliance with sections 42, 47 and 48 of the Act in relation to a proposed application that has become the application;
 - Any relevant responses received to formal consultation undertaken; and
 - The account taken by the applicant of any relevant responses.

12. The Applicant recognises the importance of engaging with stakeholders, including communities, through its work. The Applicant’s principles, which are adhered to throughout all its projects, including Norfolk Vanguard are:
 - Openness and transparency;
 - Providing opportunities to get involved;
 - Sharing information and understanding;
 - Listening and responding; and
 - Respect.

13. Below is a description of how consultation feeds into the decision-making process, which has shaped the Norfolk Vanguard proposals and how the Applicant has taken regard of consultation feedback.

1.4. Responses to feedback

14. The project has followed an EIA process that has been systematic, comprising a sequence of tasks that is defined both by regulation and by best-practice, and iterative with opportunities for addressing concerns throughout. The process has been analytical requiring the application of specialist skills from a wide range of disciplines and professional experience has been applied in order to reach impartial, objective decisions. The process has also been consultative, with provision being made for obtaining information and feedback from interested parties including local authorities, communities and statutory and non-statutory bodies. All responses received to consultation have been considered, and the project has benefitted greatly as a result, ensuring for example:
 - Robust assessments have been undertaken to complete the Environmental Statement (ES);
 - Attention to matters of importance, interest and concern to stakeholders have influenced project site selection, design and embedded mitigation; and
 - Improved information has been provided and consultation has encouraged participation.
15. Strategic decisions regarding fundamental project locations (such as the offshore wind farm location and grid connection point) have been made in conjunction with the Crown Estate and National Grid respectively.
16. Responses focussed on particular topics, and relevant policies and management practices (for example local or national frameworks, and the management of different aspects of the environment) were considered to a large degree through the Evidence Plan Process (EPP) (see Chapter 9). The local knowledge of residents, business people, those with land interests and the wider community, encompassing a broad spectrum of experience, perspectives and priorities who contributed to informal and formal consultation has been systematically compiled, during distinct consultation episodes. In between consultation events, there has also been on-going communication with interested parties, and as project knowledge has evolved and been shared widely, local residents have continued to provide views and note concerns and ideas. The multi-disciplinary design team formed to undertake the development has been made aware of local feedback appropriately throughout, and also in attendance at public events throughout the process to answer questions.
17. The Applicant has applied expert judgement in deciding how to respond to feedback received within the project development process, taking into account and balancing

complex environmental, physical, technical, commercial and social considerations and opportunities as well as engineering, consenting, and feasibility requirements.

18. The analysis of alternatives, decisions and reasoning of the solutions adopted are described in the ES (Chapter 4 Site Selection and Alternatives). Summaries of how the Applicant has responded to consultees, including in instances where the breadth of concerns and priorities raised by consultees in relation to certain alternatives considered by the project have uncovered conflicting consultee preferences, are described within this Consultation Report and Appendices.
19. In summary, the Applicant has made the following decisions in response to consultation:
 - **Commitment to ducting Norfolk Vanguard and Norfolk Boreas in one construction operation.** From the outset the Applicant was committed (subject to both Norfolk Vanguard and Norfolk Boreas receiving development consent and progressing to construction) to a strategic approach to delivering Norfolk Vanguard and Norfolk Boreas and to burying onshore transmission cables. Between September 2016 and February 2017 discussions with relevant Local Planning Authorities resulted in the Applicant determining to install the transmission ducts for both projects at once. This strategic approach would allow the main civil works for the onshore cable route to be completed in one construction period and in advance of cable delivery, preventing the requirement to reopen the entire cable corridor. This measure addressed concerns expressed by Local Authorities that the projects would cause significant disruption if the Applicant were to return to “open up Norfolk” a second time. This decision also helps to ensure that potentially both the project and Norfolk Boreas could be delivered within the timeframes set by the UK government in relation to targets on renewable energy and CO₂ reduction.
 - **Refinements to the onshore cable corridor construction process.** As the project evolved between Phase I and through Phase II and informal drop-in events attracted interest from the farming community and those with land interests in the project area, many conversations highlighted concerns and ideas regarding how to maintain soil quality along the onshore cable corridor route, manage wet soils and drainage issues effectively during construction and minimise disruption by reinstating the land quickly. The duct installation strategy evolved accordingly. A sectionalised approach was developed in order to minimise impacts. Construction teams would work on a short length (originally approximately 100m section, extended to approximately 150m as a result of the HVDC decision, see page 10) and once the cable ducts have been installed, the section would be back-filled, and the top soil replaced before moving onto the next section. This

would minimise the amount of land being worked on at any one time and would also minimise the duration of works on any given section of the route. In response to this dialogue, the proposed methodology was described in a Landowner Information Pack (with further detail and embedded mitigation included in a second edition). The methodology requires a running track along the cable corridor to facilitate the work-front approach, which also has advantages in terms of reducing works traffic on local highways and byways.

- **Agreement on how to manage sandbank habitats of conservation importance within the order limits of the offshore cable corridor.** The Applicant is considering pre-sweeping (sand wave levelling) during export cable installation within the Special Area of Conservation (SAC) to bury cables below the mobile sand wave layer. This would minimise the requirement for further burial operations during the operational phase of the project. As a result of the evidence plan process, Natural England has requested that any sediment arising from the SAC is deposited back into the SAC to allow the sandbank system to be replenished and Norfolk Vanguard Limited has committed to this within the DCO application. In order to inform the dialogue and impact assessments, Natural England requested further information on what would happen to the sediment following pre-sweeping and disposal. The Applicant commissioned a study by ABPmer which includes assessing whether the sediment would stay within the SAC and replenish the sandbank system. The conclusions of the report were positive and confirm that the system would recover within natural variation.
- **Undertaking extensive geophysical surveying along the onshore cable corridor and environmental survey area.** Phase 0 and Phase I consultation undertaken through the Evidence Plan Process (EPP) highlighted the potential for encountering buried archaeological sites along the proposed cable corridor. Extensive geophysical surveying and high resolution aerial photography was therefore undertaken over a more extensive area of land than a project of this type would normally be expected to undertake. This action has enabled sensitive site selection in terms of avoiding disturbance to archaeological remains, and has provided high-quality data, which is of value to organisations including NCC and the National Trust.
- **Locating landfall at Happisburgh South.** Following consultation with nature conservation bodies and site selection work the offshore cable corridor has been refined to avoid the Cromer Shoal Chalk Beds Marine Conservation Zone (MCZ), therefore removing any direct impacts of the project on the Marine Conservation Zone. Happisburgh South also presented the following advantages:

- Allows co-location of Norfolk Vanguard and Norfolk Boreas landfall and reduces the total amount of area directly impacted;
 - Avoids populated areas as far as possible;
 - Avoids areas at risk of flooding as far as possible;
 - Provides opportunities associated with Happisburgh archaeology; and
 - Avoids technical engineering and feasibility risks associated with locating infrastructure in the brown field site within the Bacton Gas Terminal land.
- **Determining that long Horizontal Directional Drilling (HDD) should be deployed at the landfall.** Long HDD at landfall requires no works on the beach or construction vehicular access to the foreshore. This will result in no restrictions or closures to the beach and maintains access for the public during construction. The Applicant has also committed to not using the beach car park at Happisburgh South as part of the construction works at landfall.
- **Refining the onshore cable corridor.** An iterative and multidisciplinary approach incorporating engineering, buildability, environmental, landowner, community, and stakeholder considerations was used in the development of cable corridor options. A series of project team workshops were held to ensure each of the factors were considered effectively. During the refinement of the onshore cable corridor, views on the siting of above ground infrastructure, including cable relay stations (as required at the time), fed into determining the final route. As the routes became more defined, and indicative routes were shared with those with land interests, and others, feedback also became more specific. Some changes were undertaken to avoid disturbing possible buried remains and archaeological features (such as around Kerdiston Church), giving better configuration for crossing the Marriott's Way and route changes to accommodate landowner requests, for example to align with field boundaries.
- **Additional trenchless crossings at County Wildlife Sites and other sensitive features.** A decision was taken to include additional trenchless crossing techniques, to remove any direct impacts, at the following key sensitive environmental features:
- Wendling Carr County Wildlife Site;
 - Little Wood County Wildlife Site;
 - Land South of Dillington Carr County Wildlife Site;

- Kerdiston proposed County Wildlife Site;
 - Marriott's Way County Wildlife Site / Public Right of Way (PRoW);
 - Paston Way and Knapton Cutting County Wildlife Site;
 - Norfolk Coast Path;
 - Wendling Carr; and
 - Witton Hall Plantation along Old Hall Road.
- **Avoiding the need for a “cable bridge” where the onshore cable corridor crosses the North Walsham & Dilham Canal.** Consultation with Anglian Water and the Environment Agency, through the EPP over a long period, helped to identify the scope of assessments required and subsequently determined that the results of those assessments, site investigations and engineering design enabled a positive conclusion that a drilled solution can be implemented without significant risk to water quality and the chalk aquifer in the ‘Source Protection Zone’. As a result, the Applicant has been able to determine in Spring 2018, that a cable bridge will not be included within the DCO and ES. This avoids landscape and visual impacts, by eliminating the need for permanent above ground infrastructure crossing the canal.
- **Decision to adopt HVDC transmission technology.** Local statutory, non-statutory and community stakeholders raised a number of reasons for the project to make a commitment to the deployment of High Voltage Direct Current (HVDC) transmission technology. Originally, the Applicant planned to make a decision on a transmission solution (High Voltage Alternating Current (HVAC) or HVDC) post consent as part of the project procurement process. Taking the decision later would have allowed the Applicant to assess the readiness and capacity of the supply chain to supply the appropriate technology. However, consultation highlighted how strongly stakeholders in Norfolk prioritise environmental and social factors and were opposed to the landscape and visual impacts associated with HVAC technology; accordingly the Applicant proactively brought forward strategic supply chain discussions and chose to engage the supply chain early in order to ensure technical, commercial, consenting, and feasibility requirements could be better understood. As a result, the Applicant has been able to commit to adopting HVDC transmission technology, which minimises environmental impacts through the following design considerations:
- HVDC requires fewer cables than the High Voltage Alternating Current (HVAC) solution for offshore and onshore cables;

- During the cable installation phase for offshore there is less pre-sweep dredging, cable protection and fewer crossings required;
 - During the duct installation phase for onshore, use of HVDC reduces the cable route working width (for Norfolk Vanguard and Norfolk Boreas combined) to 45m from the previously identified worst case of 100m. As a result, the overall footprint of the onshore cable route required for the duct installation phase is reduced from approx. 600ha to 270ha;
 - The width of permanent cable easement onshore is also reduced from 54m to 20m;
 - Removes the requirement for a Cable Relay Station (CRS);
 - Reduces the maximum duration of the cable pull operation(s) from three years down to two years;
 - Reduces the total number of jointing bays onshore for Norfolk Vanguard from 450 to 150; and
 - Reduces the number of drills needed at trenchless crossings (including landfall).
- **Siting the onshore project substation away from as many homes as possible, while still within a practicable distance from the existing 400kV National Grid substation.** The Applicant accepted National Grid’s connection offer at Necton, and then followed the required EIA process to determine an appropriate site for the onshore project substation, with due regard to community and statutory and non-statutory stakeholder views. Initially, local feedback raised concerns relating to the proximity to homes of the proposed substation infrastructure for Norfolk Vanguard. Landscape and visual impacts and noise levels during operation were cited as concerns. Consultees expressed differing opinions, for instance: some indicated that there were merits to keeping electrical infrastructure close to the existing NGET infrastructure, while others suggesting siting the onshore project substation to the east, away from homes and so that existing woodland could help screen the views of the onshore project substation. A workshop and additional drop-in was convened (Phase IIb) to help residents and interested parties consider the range of constraints and opportunities the EIA process was revealing. Again the feedback from local people was written-up into a report and considered by the team, feeding into the final project substation site and embedded mitigation, including planting schemes.

- **Dedicated works access to keep construction and operation traffic out of Necton and Ivy Todd.** Consultees living in and around Necton also expressed concerns about substation construction works, notably relating to traffic and access, light pollution and noise. The Applicant has provided information (in the FAQ document and newsletters) about how these concerns will be addressed, for example providing information on construction timings and methodology, and acoustic cladding). Access and traffic issues have been considered in order to reduce the impact of construction traffic on Necton and Ivy Todd. Works to undertake the National Grid substation extension will gain access via the existing junction off the A47 with an appropriate traffic management scheme in place. For access to the onshore project substation there will be a new access at Spicer’s Corner, with a filter lane.

- **Developing informed supply chain and education and skills strategies.** In order to maximise opportunities for local and regional benefits, the Applicant is engaging early with the local supply chain in order to encourage local participation, and readiness for the contracts that will be awarded for construction of the 60km cable corridor and onshore infrastructure. The Applicant is in discussion with Peel Ports (Great Yarmouth) with a view to establishing its operations and maintenance base at Great Yarmouth. A Memorandum of Understanding (MoU) has been signed between the parties to facilitate the dialogue which it is anticipated will be positively concluded soon. This would result in at least 150 jobs being based in Great Yarmouth for the duration of the lifetime of Norfolk Vanguard and Norfolk Boreas. The Applicant is contributing to local skills development programmes and is working with local schools, colleges and the University of East Anglia on successful pilot projects. Building on preliminary work, the Applicant is developing a skills strategy informed by, and aligning with, local authority strategy and the NALEP energy sector skills plan. The Applicant’s aim is to create opportunity and support the aspirations of young people who are keen to work in the sector.

- **Ensuring consultation has been meaningful, accessible, and open to all.** To enable all who might have an interest in the project to access relevant information, the Applicant has used a wide range of channels and participation has been supported by a range of materials to encourage informed responses and feedback. Feedback is considered appropriately during decision-making processes. Examples of how the applicant has responded to feedback about the consultation process are included in relation to all phases of informal and formal consultation. The Applicant has responded to concerns raised about the consultation process through regular adaptations and enhancements to the consultation undertaken. An example is the way in which the Applicant has

developed increasingly sophisticated visual materials, to help consultees understand what project elements would “look like”. The Applicant developed enhanced 3D models to help show local residents “their view” and new photomontages which more closely resemble “natural-looking” fields of view.

1.5. Conclusion

20. The Applicant has fulfilled its statutory duty across all aspects to provide meaningful consultation and to ensure that issues identified and raised by the local community, landowners and those with an interest in the application site, as well as local authorities and prescribed consultees, have been considered and, in the majority of cases, addressed at an early stage in the project’s development.

2. EXPLANATORY TEXT

21. This Consultation Report describes the consultation activities undertaken by the Applicant (Norfolk Vanguard Limited.) in relation to the Norfolk Vanguard Offshore Wind Farm (Norfolk Vanguard) located in the Southern North Sea, and proposed associated onshore developments, collectively referred to as ‘the project’.
22. VWPL is the parent company of Norfolk Vanguard Limited (the Applicant).
23. This section of the Report seeks to provide a summary of the consultation undertaken for the project. This follows advice provided by the Planning Inspectorate (PINS) in Advice Note 14: Compiling the Consultation Report, which states that the Applicant should set the scene and provide an overview of the whole pre-application stage.
24. Figure 1 summarises, in chronological order, the key consultation activities that have taken place since the project’s inception in 2016.
25. A further explanation of the pre-application activities set out in Figure 1 is summarised in Table 2.1.
26. References are provided to the relevant chapters of the Consultation Report where more information can be found on the specific activities.

Table 2.1 Summary of consultation undertaken for the project

Date	Consultation	Further information
March – October 2016	Phase 0 Non-Statutory Engagement	Chapters 9 - 11 of the Consultation Report
October 2016 – January 2017	Phase I Non-Statutory Consultation – Scoping	Chapter 12 of the Consultation Report
March – April 2017	Phase II Non-Statutory Consultation – Cable Route Refinements	Chapter 13 of the Consultation Report
July 2017	Phase IIb Non-Statutory Consultation – Focused Onshore Substation and Landfall	Chapter 14 of the Consultation Report
November – December 2017	Statutory Consultation – section 42	Chapter 19 of the Consultation Report
November – December 2017	Statutory Consultation – section 47	Chapter 20 of the Consultation Report
November – December 2017	Statutory Consultation – section 48	Chapter 21 of the Consultation Report
January – June 2018	Post Statutory Consultation Engagement	Chapter 25 of the Consultation Report

Consultation Overarching Timeline

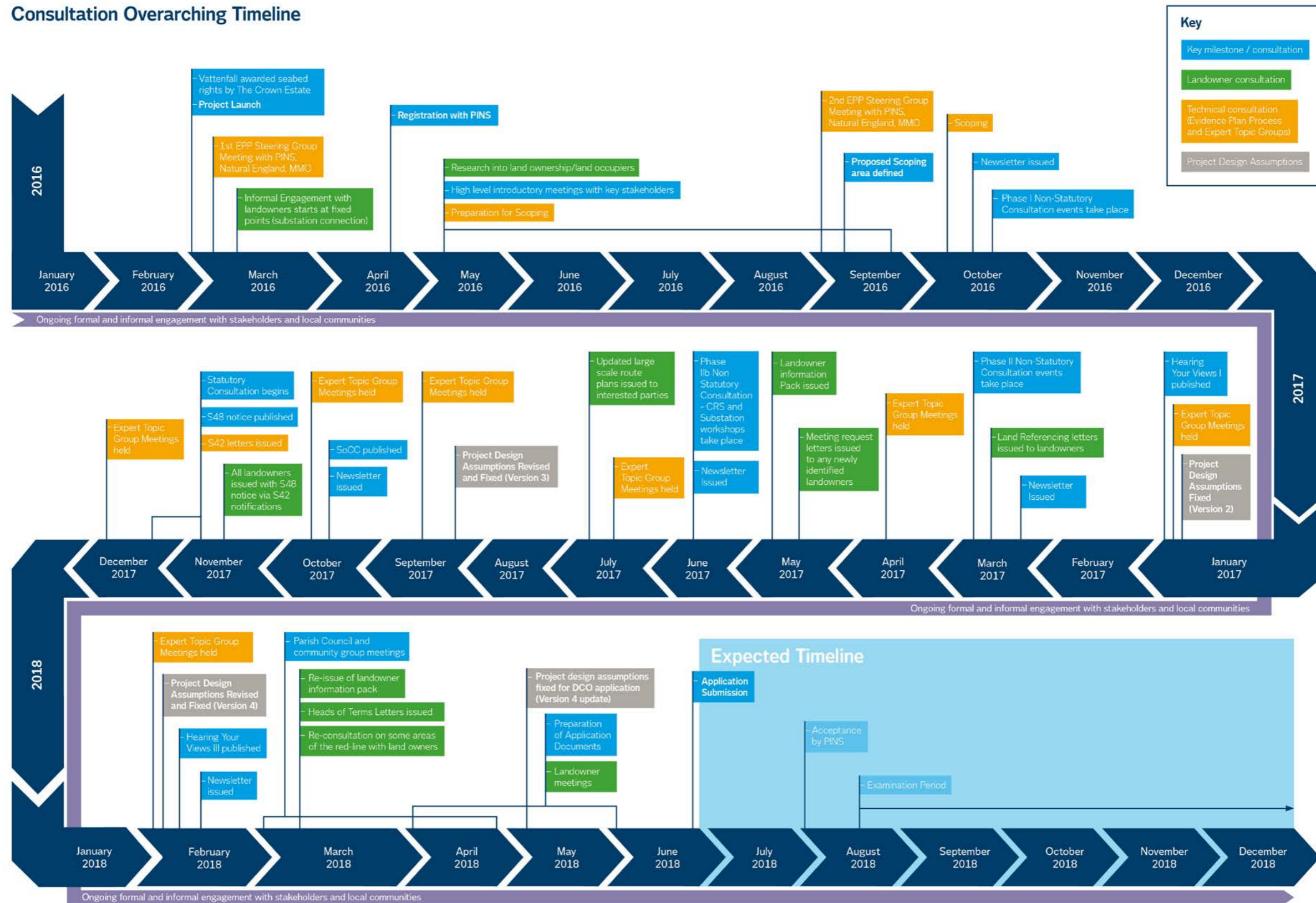


Figure 2 – Timeline of activity and consultation

3. INTRODUCTION

3.1. Purpose of this report

27. This report details how the Applicant has complied with the provisions of the 2008 Act and associated legislation in relation to pre-application consultation for the proposed project. It has been prepared pursuant to section 37(3)(c) and section 37(7) of the 2008 Act, and sets out the approach taken regarding:
- Statutory consultation (in order to comply with sections 42, 47 and 48 of the 2008 Act) that has taken place during the development of the project and how the consultation responses have been taken into account (pursuant to section 49 of the 2008 Act) and subsequently shaped the final form of the Application; and
 - Non-statutory ‘informal’ consultation that has been undertaken on the project and which has also had an effect on the development of the project and the Application.

3.2. The Applicant

28. Norfolk Vanguard Limited is proposing to develop the Norfolk Vanguard Offshore Wind Farm.
29. Vattenfall, the parent company of VWPL and Norfolk Vanguard Limited, is the Swedish state-owned utility company and one of Europe’s largest generators of electricity and heat. Vattenfall is also the second largest developer in the global offshore wind sector. Vattenfall’s purpose is to power climate smarter living and the company is strongly committed to significant growth in wind energy, both onshore and offshore.
30. Vattenfall has invested over £3 billion in UK wind power since 2008. As of early 2018, Vattenfall operates more than 1GW of installed capacity in the UK with more than 4GW of onshore and offshore wind in development over the next decade. Vattenfall plans to invest €5billion in renewables, mainly offshore wind, in Northern Europe by 2020 with an ambition to have 4GW of operational capacity by 2020 and 7GW by 2025.
31. The company has the ambition that the UK will continue to be a growth market for Vattenfall, with Norfolk Vanguard and Norfolk Boreas (Norfolk Vanguard’s sister project, see Section 5) providing a significant next step.
32. Vattenfall has world leading experience in offshore wind, as owners of Kentish Flats, Kentish Flats Extension and Thanet offshore wind farms operating in the southern North Sea, and Dan Tysk and Sandbank in the German North Sea. In the Irish Sea Vattenfall also owns the Ormonde Offshore Wind Farm. Vattenfall is also developing a number of European offshore wind farms, including the European Offshore Wind

Deployment Centre located in Aberdeen Bay. This innovative offshore wind scheme will trial next generation technology and represents one example of where Vattenfall is investing significantly in new research both in terms of technical innovation, as well as environmental studies.

3.3. The project

33. The offshore wind farm comprises two distinct areas, Norfolk Vanguard East (NV East) and Norfolk Vanguard West (NV West) within which wind turbines and associated infrastructure, including offshore substation platforms and array cables, will be located. The offshore wind farm will be connected to the shore by offshore export cables installed within the offshore cable corridor from the wind farm to a landfall point at Happisburgh South, Norfolk. Further details are provided in the Environmental Statement (ES), Chapter 5 Project Description.
34. The onshore project area comprises a landfall (where the offshore cables are brought ashore and jointed to the onshore cables within transition pits), the onshore cable corridor (within which the onshore export cables will be located), a project substation and an extension to the existing Necton National Grid substation (Chapter 5 Project Description, Figure 5.2).

3.4. Background to the project

35. In 2010, VWPL acquired rights from The Crown Estate, in a joint venture with ScottishPower Renewables, to develop Zone 5 (the former East Anglia Zone), an area of sea off the coast of East Anglia.
36. In February 2016 the joint venture between Vattenfall and ScottishPower Renewables was dissolved and replaced with individual 'Project Specific Agreements' from The Crown Estate for each developer to progress their interests independently.
37. Prior to the end of the joint venture, in 2014 the partnership gained planning permission for East Anglia ONE and in November 2015 submitted an application for a Development Consent Order for East Anglia THREE.
38. Norfolk Vanguard East falls within an area originally identified as East Anglia FOUR. As East Anglia FOUR was in an early stage of development, Vattenfall took the decision to deregister the project from the Planning Inspectorate in order to bring forward the most effective combined approach to development of the northern half of the zone.

3.5. Early project definition, site selection and refinement

39. The former East Anglia Zone (Zone 5) was originally selected by The Crown Estate as a suitable area offering ‘potential for offshore wind’ as part of the Round 3 Offshore Wind Zone tendering process in 2008. All the Round 3 Zones were defined using an iterative process that took account of a number of constraints imposed by existing or future use of the sea.
40. The locations of Norfolk Vanguard (and Norfolk Boreas) within the former zone were identified using a three-step process with the aim of providing sites that are possible to consent and construct with the lowest cost to the UK consumer (see Chapter 5 of the ES for further information). This included environmental constraints mapping to understand areas which could be developed, a technical feasibility assessment of these areas, including wind resource and seabed suitability, and a comparative cost review. In 2016, following offshore site selection, the Applicant was awarded an Agreement for Lease (AFL) for the seabed areas within which it will develop Norfolk Vanguard (and Norfolk Boreas).
41. Next followed a review of potential offshore cable corridor and landfall options – defined by existing constraints and opportunities. Understanding possible landfalls helped to define the scope of investigations involving National Grid and the Applicant as to the appropriate strategic, economical and efficient location for power generated by Norfolk Vanguard to connect into National Grid’s transmission network.
42. With these endpoints in place, the project design has progressed, led both by consultation and the EIA process, with cycles of appraisal to review options and critically reflect on their implications. This process is summarised in Figure 3.

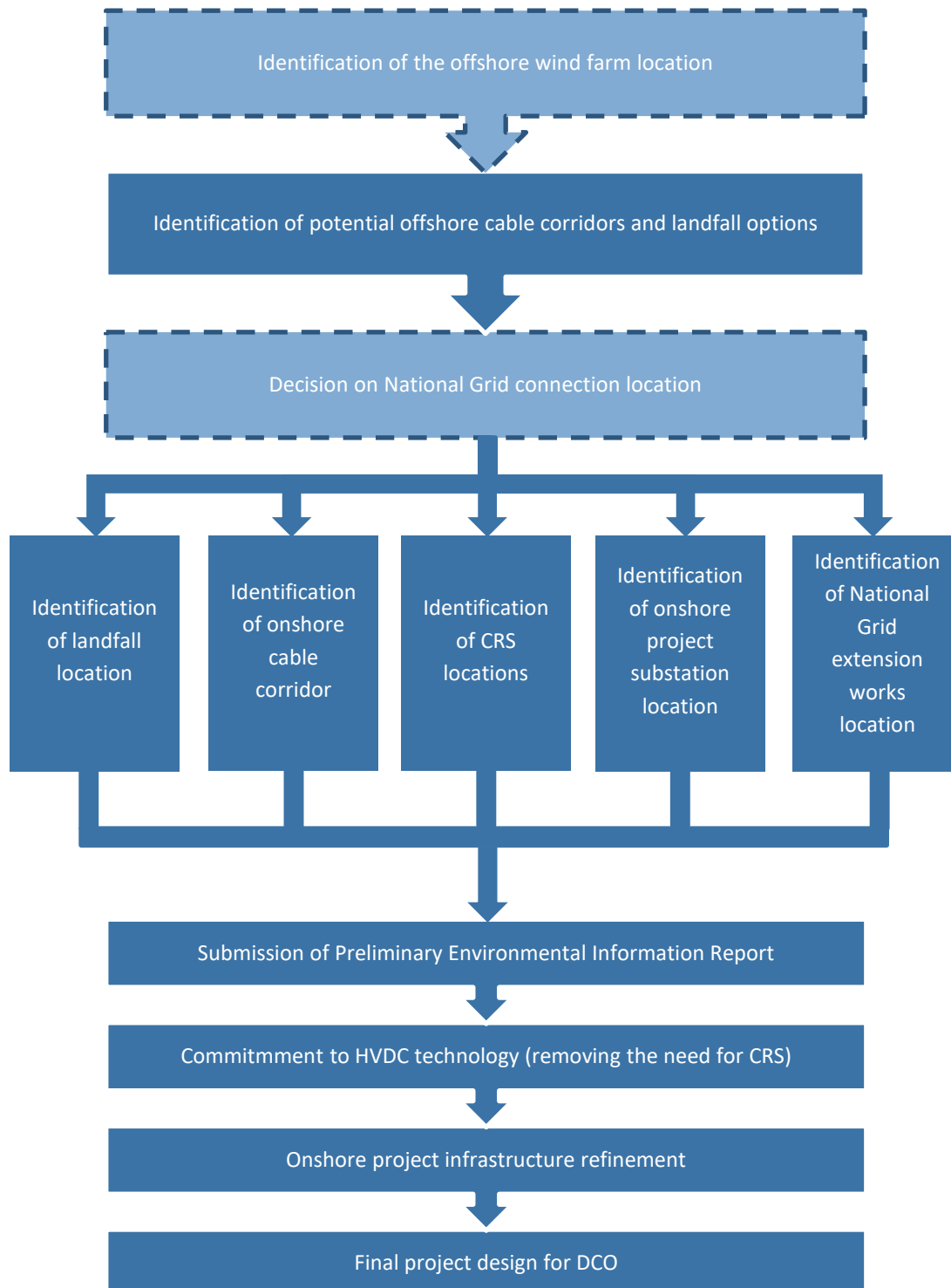


Figure 3 Site selection process for Norfolk Vanguard (and Norfolk Boreas)²

² Strategic decisions regarding fundamental project locations such as the offshore wind farm location and grid connection point have been made in conjunction with the Crown Estate and National Grid respectively.

43. During site selection and project refinement, the following principles and strategic commitments made by the Applicant have guided the evolving and responsive development process³:
- Subject to both Norfolk Vanguard and Norfolk Boreas receiving development consent and progressing to construction, onshore ducts will be installed for both projects at the same time, as part of the Norfolk Vanguard construction works. This would allow the main civil works for the cable route to be completed in one construction period and in advance of cable delivery, preventing the requirement to reopen the land in order to minimise disruption. Co-location of onshore project substations for Norfolk Vanguard and Norfolk Boreas based on the requirements in the Horlock Rules to keep intrusion into surrounding areas to a reasonably practicable minimum, this will keep these developments contained within a localised area and, in so doing, will contain the extent of potential impacts;
 - Ruling out use of overhead lines to connect into the national grid, in order to minimise visual impacts, onshore transmission cables will be accommodated within buried ducts;
 - Preferring the shortest, most direct route for cable-routing so far as appropriate, in order to minimise impacts, and transmission losses by minimising footprint for the offshore and onshore cable routes;
 - Avoidance of key sensitive features where possible, including utilising open agricultural land (where this is not possible, further mitigation will be undertaken as required); and
 - The need to accommodate the range of technology options sought within the design envelope (for example, a range of sizes of turbine from 9MW up to 20MW, different foundation types. Initially, this principle also extended to maintaining options with respect to the transmission technology to be deployed).

3.6. Structure of the report

44. This report describes the consultation process that the Applicant has followed in terms of both the non-statutory "informal" phases of consultation and the formal consultation and publicity stages as required under sections 42, 47 and 48 of the 2008 Act. Further consultation subsequent to the completion of the formal pre-application consultation but prior to the Application being made is also described. In

³ This is a simplified overview of guiding principles underpinning the site selection process. The detail is available in ES Chapter 4 Site Selection and Assessment of Alternatives.

each case, the report is structured chronologically in terms of consultation undertaken, the issues raised by consultees, and subsequently the action taken to address those issues.

45. Issues raised through feedback at each stage of consultation, including the statutory consultation responses, have been reviewed, grouped and summarised into tables of key issues (see Chapter 17 for informal consultation and Chapters 22-24 for formal consultation). Due to the number of responses received these issues have been grouped where appropriate into themes. Care has been taken throughout to ensure that issues have been recorded, reviewed and analysed in the context within which they were submitted.
46. All feedback has been considered in detail and has fed into the development of the project.
47. Full detailed assessments of the consultation responses have been provided at intervals throughout the pre-application process through the publication of interim consultation reports, called 'Hearing Your Views I, II & III'. These reports include detailed analysis of the feedback received and are included in Appendix 3.1, 3.2, and 3.3.
48. An overview of the structure of this report is provided in Table 3.1, below.

Table 3.1 Structure of the Consultation Report

Chapter	Title	Overview	Relevant Appendices
Chapters 1 - 3	Executive Summary and Introduction	Overview summary of the outcome of pre-application consultation and introduction to the project.	3.1 – 3.3
Chapters 4 - 7	Regulatory Context and Approach to Consultation	Approach to consultation with regard to the requirements of the 2008 Act and accompanying guidance.	4.1 – 4.3, 6.1, 7.1
Chapters 8 - 17	Non-Statutory Consultation (Phase 0 to Phase IIb)	Non-statutory 'informal' consultation conducted prior to the formal sections 42, 47 and 48 consultation and publicity stages under the 2008 Act.	8.1, 9.1- 9.26, 11.1 – 11.3, 12.1 – 12.9, 13.1 – 13.25, 14.1 – 14.9, 16.1
Chapter 18	Approach to Formal Consultation under sections 42, 47 and 48 of the 2008 Act	The general approach to the statutory pre-application consultation.	N/A
Chapter 19	Formal Consultation under section 42 of the 2008 Act	What has been done to satisfy the requirements of section 42 of the 2008 Act.	19.1 – 19.17
Chapter 20	Formal Consultation under section 47 of the 2008 Act	Approach to the section 47 consultation including development of the Statement	20.1 – 20.15

Chapter	Title	Overview	Relevant Appendices
		of Community Consultation (SoCC) and the methods used to consult.	
Chapter 21	Formal Consultation under section 48 of the 2008 Act	Development and publication of the section 48 notice.	21.1 – 21.2
Chapter 22	Summary of Responses under section 42 of the 2008 Act	On a topic by topic basis, responses received from section 42 consultees and summarises the regard that has been had to the responses in finalising the Application.	22.1
Chapter 23	Summary of Responses under section 47 of the 2008 Act	On a topic by topic basis, responses received from section 47 consultees and summarises the regard that has been had to the responses in finalising the Application.	23.1
Chapter 24	Summary of Responses under section 48 of the 2008 Act	On a topic by topic basis, responses received from section 48 consultees and summarises the regard that has been had to the responses in finalising the Application.	N/A
Chapter 25	Post-Formal Consultation Engagement	Further consultation conducted following the formal consultation in considering outstanding issues and concerns.	25.1 – 25.15
Chapter 26	Conclusion	A summary of the pre-application consultation undertaken for the project.	N/A
Chapter 27	Statement of Compliance	A full statement of compliance.	N/A

49. The main body of this report summarises the consultation process, responses received and the regard that has been had to those responses. A fuller summary of the consultation responses and regard had by the Applicant are set out as follows⁴:

- Appendix 22.1 – section 42 responses; and
- Appendix 3.3 – section 47 responses

50. Throughout this Consultation Report, reference is made to a number of other Application documents, particularly the ES and the draft Development Consent Order (DCO). In reading this Report, due attention should be paid to the contents of these other Application documents. This is particularly important in understanding how regard has been taken to the consultation responses in finalising the Application.

⁴ As there were no identifiable responses from section 48 consultees, these have not been included as an appendix

3.7. Next steps

51. Once PINS accepts the application for examination on behalf of the Secretary of State following its 28 day acceptance period, a number of steps will be initiated. This includes the opportunity for interested parties (IPs) to register to be involved in the examination process and to provide comment in the form of written representation, direct to PINS, about the project.
52. Registering as an IP ensures that IPs will have the opportunity to take part in the examination by providing further evidence on any issues that concern them. IPs will also be informed of progress of the examination, including when it concludes, and will be notified of the final decision.
53. For information on how to register, readers are referred to the PINS website (at <http://infrastructure.independent.gov.uk>) or alternatively a copy of the registration form can be requested from the PINS helpline on 0303 444 5000.
54. Once the examination begins, representations on the Application should be provided to PINS rather than to the Applicant.
55. Following submission of the application for a Development Consent Order for Norfolk Vanguard to PINS, the next steps may be summarised as follows:
 - PINS considers the application and decide whether to accept the Application within 28 days of receipt.
 - PINS notifies the Applicant of acceptance or refusal.
 - If accepted, the Applicant publishes a notice of an accepted Application in the prescribed manner and provides a date by which responses must be received by PINS.
 - Interested parties that wish to respond must register in the prescribed manner and within the deadline published in the acceptance notice.
 - Within approximately three months following the end of the response period, PINS will hold a preliminary meeting to establish how the application will be examined and what issues are to be the focus of the examination. The preliminary meeting marks the start date of the six-month period for examination.
 - The examination may require further written representations from interested parties or involve hearings where interested parties can make further representation on issues of interest to the examiners.
 - Following examination the examiners will provide a recommendation to the Secretary of State on whether or not to grant consent.
56. Following consent determination, and assuming consent is awarded, the Applicant would expect to continue to consult relevant bodies and interested parties in

developing the scheme and subsequently throughout the construction and operational phases.

4. REGULATORY CONTEXT

4.1. Consultation requirements – the consultation report

57. The requirement for a Consultation Report is set out in section 37(3)(c) of the 2008 Act where it is noted that an application for a DCO must, among other things, be accompanied by a Consultation Report. Section 37(7) of the 2008 Act defines the Consultation Report as a document giving details of:
- What has been done in compliance with sections 42, 47 and 48 of the 2008 Act in relation to a proposed application that has become the application;
 - Any relevant responses received to formal consultation undertaken; and
 - The account taken by the applicant of any relevant responses.
58. The Consultation Report responds to one of the key requirements set out in the 2008 Act; i.e. the statutory obligation on applicants to carry out a process of pre-application consultation. This consultation should be undertaken with statutory or prescribed bodies (under section 42 of the 2008 Act), with local communities (under section 47) and through the general notification of a proposed application (under section 48).
59. The legislative context on these sections of the 2008 Act is further described in this Consultation Report as follows:
- The duty to consult under section 42 is set out in Chapter 19;
 - The duty to consult under section 47 is set out in Chapter 20; and
 - The duty to publicise under section 48 is set out in Chapter 21.
60. Section 50 of the 2008 Act provides that the applicant must have regard to any guidance issued by the Secretary of State. Department for Communities and Local Government (DCLG) guidance on the pre-application process for major infrastructure projects has been issued which contains commentary on Consultation Reports. Where an applicant has not been able to follow this guidance, they should provide comments setting out why this is the case in the Consultation Report.

4.2. Relevant Legislation and Guidance

61. In developing the approach to consultation for the project, the Applicant has given careful consideration to the specific requirements set out in the following legislation:
- The Planning Act 2008;
 - The Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 and 2017 (the EIA Regulations); and
 - The Infrastructure Planning (Applications, Prescribed Forms and Procedures) Regulations 2009 (the APFP Regulations).

62. In addition, in preparing this Consultation Report, attention has been given to:
- DCLG guidance on pre-application consultation (March 2015);
 - PINS Advice Note 6 on the Preparation and Submission of Application Documents (October 2014); and
 - PINS Advice Note 14 on the Consultation Report (April 2012).
63. Further information on how the Applicant has had regard to the requirements of the 2008 Act and accompanying guidance in undertaking its formal consultation activities can be found in this Consultation Report as follows:
- For section 42 consultation: Chapter 19;
 - For section 47 consultation: Chapter 20; and
 - For section 48 publicity: Chapter 21.

4.3. Statement of compliance

64. The Chapters of this Consultation Report that either set out the activities the Applicant has undertaken under sections 42, 47 and 48 of the 2008 Act (Chapters 19, 20 and 21 respectively) or summarise the relevant responses and the regard that the Applicant has had to the responses received under sections 42, 47 and 48 (Chapters 22, 23 and 24 respectively) conclude with a Statement of Compliance. These Statements seek to confirm that the project has adhered to relevant legislation and guidance in undertaking pre-application consultation.
65. Each Statement of Compliance is brought together in Chapter 27 to demonstrate that, to the best of the Applicant's knowledge and using best endeavours, all relevant requirements set out in the legislation and guidance listed above have been adhered to in completing the pre-application process for the project.

4.4. General Data Protection Regulation (GDPR)

66. Vattenfall takes data security very seriously and has a clear privacy policy published on its website (see Appendix 4.1).
67. From the 25th May 2018, new requirements under the General Data Protection Regulation (GDPR) will be in force. The GDPR provisions will apply to companies. Consultee details held by the company will fall within the definition of "data", which applies to "any data that can be used to identify an individual, and so includes names and email addresses".
68. The Applicant has ensured that its existing arrangements for data handling were compliant by the time the new provisions came into force.

69. It is important that the data controller (that being the Applicant or a company the holding data) can identify *what* data it has, *where* it came from and the lawful basis for processing this data. The lawful basis for the Applicant’s purposes can be found at GDPR Article 6 Paragraph 1:

(1) Processing shall be lawful only if and to the extent that at least one of the following applies:

- c) processing is necessary for compliance with a legal obligation to which the controller is subject;*
- d) processing is necessary in order to protect the vital interests of the data subject or of another natural person;*

70. In the case of this project, there is an exemption to this for processing data e.g. a legal obligation to consult under section 42. The GDPR requires data held for a purpose e.g. a legal obligation to consult. This data needs to be:

- held as long as necessary for the purpose;
- be kept up to date;
- regularly reviewed for retention or deletion; and
- where appropriate securely deleted.

71. In practice, this means that there should be a clear and logical audit trail for the processing and handling of data by the Applicant and any companies involved in the project that hold such data. The Applicant is compliant with this requirement as it undertakes to ensure the following:

- 1) The data is securely, clearly and logically stored and reviewed to ensure it is up to date; and
- 2) Any details that are no longer required for the DCO are deleted.

4.5. The Applicant’s consultation approach (general principles)

72. The Applicant is committed to honest and open engagement and seeks to ensure that communities have the chance to get involved, share their views and influence the project in a meaningful and timely manner.

73. National Policy Statements establish the need for energy and renewable energy generation. The need for the project therefore does not fall within the scope of the statutory consultation, however, comment *was* sought during earlier informal stages of consultation to help ascertain the levels of local understanding of the EIA and DCO processes in order to inform and tailor the consultation approach for future stages. Further information about this is included in Chapter 2 of the ES, and Chapter 7 of this report.

74. The Applicant recognises the importance of engaging with stakeholders, including communities, through its work. The Applicant’s principles, which are adhered to throughout all its projects, including Norfolk Vanguard are:
- Openness and transparency;
 - Providing opportunities to get involved;
 - Sharing information and understanding;
 - Listening and responding;
 - Respect.
75. The Applicant believes that in line with a policy of openness and transparency, appropriate information provision enables meaningful involvement. To this end, associated with the release of new information about the project (e.g. project newsletters, new Project Design Assumptions and project refinements) Frequently Asked Question (FAQ) documents have been produced to answer questions of clarification relating to project revisions. These can be found in Appendix 4.2.
76. The Applicant takes pride in its commitment to its approach to engagement with the communities within which it operates. The Norfolk Vanguard project consultation and engagement strategy has been developed around these core principles.

4.6. Social media

77. Digital media is an important communications tool for the Applicant across a variety of different business areas, and for UK wind energy projects in particular.
78. The benefits of social media for consultation and engagement include:
- Instant – improves engagement by facilitating fast, regular and detailed project updates;
 - Improves accessibility - signposts and directs interested parties to sources of detailed information and documentation on website;
 - Generates wider discussion of key issues on digital platforms;
 - Environmentally friendly – use of digital channels reduces paper waste;
 - Provides a suitable environment for use of additional visual aids such as infographics, photography or video;
 - Reaches a wider demographic than traditional town hall meetings and newsletters; and

- Mobile – information can be accessed anytime, anywhere, providing you have access to an internet-enabled device.
79. To deliver a successful and inclusive consultation programme, which is inviting to and meets the needs of a varied audience, the Applicant believes that it is vital to use a varied suite of communication tools. For this reason, social media is an integral part of the Applicant’s project engagement plans and is written into the formal project documents including the Statement of Community Consultation.
80. Social media has been a feature in all project communication activities throughout all stages of consultation primarily because of the effective role it can play in facilitating engagement with a larger and more diverse range of stakeholder groups, including those considered ‘harder to reach’. Use of social media supplements and supports traditional forms of communication such as newsletters, posters or emails, and enables the project team to maintain a steady stream of regular updates as the project develops. While much of the consultation work appropriately focuses on the early consultation area (similar to the project scoping area, and later, the Primary Consultation Zone (PCZ)) social media provides a means of maintaining effective communication with all interested parties regardless of location.
81. Crucially, the ubiquitous nature of social media improves engagement with a wider demographic than may normally opt to engage with infrastructure projects, for example the young, the old, those with mobility or other accessibility issues and those who may not routinely engage with local community organisations, community groups and local issues.
82. Key social media accounts used throughout consultation on the project are as follows:
- Twitter - @VattenfallUK <https://twitter.com/VattenfallUK>
 - Project Hashtag - #NorfolkVanguard
 - Facebook – <http://www.facebook.com/VattenfallUK/>
83. Further information about the Applicant’s use of social media during the informal and formal consultation processes can be found in Section 8.4 and 20.4. The Applicant’s Social Media Protocol is included in Appendix 4.3. Examples of social media use for the project can be found in Appendix 4.4.

5. CONNECTING TO NATIONAL GRID

84. National Grid and Norfolk Vanguard Limited, as the developer, are legally bound to “develop and maintain an efficient coordinated and economical system of electricity transmission and to have regard to the desirability of preserving amenity” (Electricity Act 1989, section 9(2)(a), section 38 and schedule 9).
85. In line with this requirement, a range of onshore connection points and differing technology options have been considered in order to decide the most economic and efficient design solution for the project. This has included assessments of the alternative options taking into account deliverability, construction complexity, land issues, consents, technology and environmental issues. As part of the economic assessment, the total life-cost of the project has been considered, i.e. both capital and projected operational costs.
86. Given these statutory responsibilities, and the technical nature of the decision, the selection of an onshore connection point is made by National Grid and the developer and is not subject to public consultation. It does involve a wide range of technical specialists at National Grid and the Applicant, supported by specialist consultants.
87. National Grid is the owner and operator of the National Electricity Transmission System. It therefore has a unique understanding of the operation of the network and requirements to meet changes in demand and new connections in order to comply with the Security and Quality of Supply Standards the network is operated to (NETS SQSS) and its Transmission Licence obligations.
88. The NETS SQSS establish a coordinated set of criteria and methodologies that are used in the planning and operation of the National Electricity Transmission System. The NETS SQSS is a key consideration for National Grid in any new connection to the wider transmission system, since it sets out various critical controls on how the system functions, particularly if a fault occurs somewhere on the network.
89. During the assessment process, National Grid has determined impacts of alternative connection schemes and connection locations in line with these policies and standards.
90. Several potential onshore connection points were identified and assessed. This included inland connection points, where cables would be laid underground from a landfall to the inland substation, and coastal connection points, likely to require an overhead line from the landfall to the inland substation.
91. As part of the analyses, National Grid and the Applicant considered the onshore connection points from an economic and strategic perspective, which included

consideration of the additional cost and investment required for the connection, the capacity required and the predicted timing of the connection. One important element of this assessment was the cost that would be passed on to the consumer (the public and the businesses) as a result of the works required to ensure the network could accommodate the project. Whilst the Applicant contributed to the process, the final offer was determined by National Grid.

92. Following the assessment of options, National Grid offered the Applicant a grid connection at the existing Necton 400kV substation in July 2016. This grid connection point was accepted by the Applicant in November 2016.
93. This decision meant that both “end points” for the project (the offshore wind park site and the onshore connection point) were in place, and project design could progress, led by the EIA and consultation processes.
94. The Applicant and National Grid have worked together throughout the EIA and preliminary design process, in order to ensure evolving proposals continue to meet the criteria set out (in paragraph 87), above. They have also collaborated to ensure that appropriate preliminary designs for the National Grid extension works and modifications to the National Grid overhead line close to the existing National Grid substation are developed in a timely manner to be considered through the EIA and NSIP process.

6. OTHER PROJECT CONSULTATIONS

95. The Applicant has been careful to map other consultations affecting, and of interest to, the consultees, local community and others, who may wish to respond to the project consultations.
96. As well as Vattenfall's Norfolk Boreas Offshore Wind Farm project, a number of other projects have been proposed in the region. The Applicant has sought to coordinate closely with others to minimise overlapping consultation periods. The Applicant has also liaised with local planning authorities to ensure it is aware of, and can take action to minimise, any confusion that may arise from other schemes or consultation processes.
97. All of the project materials are clearly identified as relating to the Norfolk Vanguard project.

6.1. Norfolk Boreas

98. Norfolk Boreas is the second offshore wind farm proposal being developed by Vattenfall in this part of the southern North Sea. With the same proposed generating capacity of up to 1.8GW (1800MW) as the Norfolk Vanguard project, it is also classified as a NSIP.
99. Norfolk Boreas is a separate offshore wind farm project and, as such, there will be a separate statutory consultation process for it. Notwithstanding, the results of the early engagement and consultation for the project has influenced thinking on the Norfolk Boreas project, and informed project design significantly. The March 2017 informal consultation events explicitly sought feedback on the Boreas project as well as Norfolk Vanguard, and described how the infrastructure for Norfolk Boreas would be co-located where appropriate with Norfolk Vanguard.
100. This has been the subject of discussions with PINS, in part achieving a balance between avoiding "consultation fatigue", ensuring meaningful consultation (i.e. not repeating the same information, and not seeking feedback on issues that have already been agreed) and ensuring there is adequate consultation with regard to the Norfolk Boreas project. Norfolk Boreas is currently estimated to be approximately one year later than the project when submitting its application for a DCO.
101. The DCO for Norfolk Vanguard will include all Norfolk Vanguard onshore cable ducts as well as the ducts required for Norfolk Boreas from landfall to the project substation (except the Norfolk Boreas cables between the project substation and

National Grid extension).⁵ This avoids the need for two separate phases of trenching thereby reducing the overall impact of the projects. Shared access routes have also been identified. A strategic planting strategy to reduce the visual impacts of both projects has been included as part of the Norfolk Vanguard DCO (however there will be some Norfolk Boreas-specific planting).

102. Care has been taken throughout the consultation process to ensure that clarity is provided on the nature of the Norfolk Boreas consultation, and where and when local communities and consultees are able to find information and provide feedback on this project.
103. The local community will be afforded full opportunity to get involved in the consultation for Norfolk Boreas and it is anticipated it will produce its own SoCC in the autumn of 2018.

6.2. Ørsted

104. Ørsted, a Danish renewable energy company is proposing to develop Hornsea Project Three. The offshore wind turbines will be located in the eastern portion of the former Hornsea Round 3 Zone, which has a total area of 696 km² and is located approximately 121 km northeast of the Norfolk coast and 160 km east of the Yorkshire coast. The proposed landfall for offshore transmission cables is at Weybourne in North Norfolk. The proposed onshore cable corridor runs in a south / south-westerly direction for approximately 55 km. The export cables connect to Norwich Main National Grid substation, located between Swardeston and Stoke Holy Cross in South Norfolk. The maximum installed capacity of the proposed windfarm will be 2.4 GW.
105. Ørsted held early community consultation events to introduce the Hornsea Project Three Offshore Wind Farm shortly after the first round of Norfolk Vanguard public exhibitions, at the end of October – Early November 2016. Ørsted conducted its “1b” consultation (second informal consultation events) and its statutory consultation at the beginning of March 2017 and in September 2017 respectively. Ørsted submitted its DCO application to PINS in May 2018.
106. In terms of the section 42 stakeholders that Ørsted and the Applicant are talking to, there are significant overlaps. For section 47 stakeholders, there is less commonality. The exception is those stakeholders in and around the market town of Reepham. To the east of Reepham, the proposed cable corridors of the Norfolk Vanguard and

⁵ Subject to both Norfolk Vanguard and Norfolk Boreas receiving development consent and progressing to construction.

Norfolk Boreas projects cross with the export cables proposed for Hornsea Project Three.

107. Like Norfolk Vanguard, Hornsea Project Three is a large offshore windfarm, developed by Scandinavian developers, making landfall in Norfolk, and with grid connections inland, and developing according to a similar time frame. To minimise the risk of any confusion of one project with another, resulting from real or perceived similarities between the two projects, care has been taken to try to ensure that appropriate distinctions are apparent to stakeholders and communities. The Applicant's materials have been consistently and clearly branded as pertaining to Vattenfall and to the Norfolk Vanguard (and where appropriate, the Norfolk Vanguard and Norfolk Boreas) project(s).
108. There has been appropriate collaboration between the Applicant and Ørsted project teams to ensure that parallel workstreams do not interfere, to avoid duplication where possible (for example, sharing survey results where appropriate) avoid unnecessary duplication of effort from or impact on stakeholders and landowners, and are coordinated where possible.
109. To this end, there has been regular contact between the respective project managers, consent's managers, electrical package managers and communications teams from the Applicant and Ørsted.

6.3. Other active consultations

110. In addition to the above noted schemes, the following projects are also underway in the region, and the Applicant has taken account of these throughout the development of its consultation process:

ScottishPower Renewables: offshore wind farm projects

111. The Applicant and ScottishPower Renewables (SPR) began developing projects within the former East Anglia Zone in 2010. In February 2016 this joint venture was dissolved and replaced with individual 'Project Specific Agreements' from The Crown Estate for each developer to progress their interests independently. Thus, while the Applicant is developing plans for the northern half of the zone, which is split into two development areas: Norfolk Vanguard and Norfolk Boreas, SPR has continued to develop the southern area.
112. After gaining consent for East Anglia ONE and East Anglia THREE, SPR is now building East Anglia ONE. Two further projects, East Anglia ONE North and East Anglia TWO, are in the early stages of development with applications expected to be submitted in 2020 and 2019.

- 113. As the onshore infrastructure for these projects is in Suffolk, most of the onshore communities and local planning authorities that SPR is engaging with are in the County of Suffolk. The exception to this is any discussions in relation to port activities.
- 114. There has been no evidence that Norfolk Vanguard section 47 and section 42 consultees have been confused, nor has their appetite to engage with the Norfolk Vanguard EIA process been dampened, as a result of activities undertaken by SPR in relation to their active consultations.
- 115. Scottish Power Renewable and the Applicant teams are in regular contact with one another.

Highways England: Norfolk ‘Road Improvement Projects’

- 116. As part of the Road Investment Strategy (RIS) Highways England is currently proposing six major road improvement schemes along the A47 between Great Yarmouth and Peterborough.
- 117. The A47 Blofield to North Burlingham, A47 North Tuddenham to Easton, A47 Wansford to Sutton and A47/A11 Thickthorn Junction schemes are all also designated as Nationally Significant Infrastructure Projects (NSIPS) and each will be submitting individual DCO applications to the Planning Inspectorate.
- 118. The A47 Blofield to North Burlingham, A47 Wansford to Sutton and A47/A11 Thickthorn Junction are all scheduled to enter statutory consultation in 2018 ahead of DCO submissions to the Planning Inspectorate in late 2018 and early 2019.
- 119. Statutory consultation on these projects has not coincided with the statutory consultation on Norfolk Vanguard, however, ongoing informal consultation will continue to take place over the coming months and years.
- 120. The Applicant will aim to ensure that its projects are clearly differentiated from one another and from others in the surrounding area, and that engagement with Highways England on any potential cumulative impacts continues to take place.
- 121. Highways England took part in the EPP (see Chapter 9) in relation to this project.

7. CONSULTATION UNDER THE EIA REGULATIONS

122. Extensive non-statutory consultation was undertaken from the beginning of 2016 through to late 2017 on the project (see Chapters 8 to 17 of this Report). Non-statutory consultation took place around and in conjunction with key consultation milestones under the EIA regulations, including the project's request for Scoping and Transboundary Screening notifications. These key milestones are summarised below.

7.1. Scoping

123. In October 2016, at the start of the project development process for the project, Norfolk Vanguard Limited, (VWPL at the time) notified the Secretary of State of its intention to undertake an EIA and provide an Environmental Statement (ES) in respect of the project in October 2016.
124. In accordance with Regulation 6(1)(b) of the 2009 EIA Regulations, a request for a scoping opinion was submitted to the Planning Inspectorate on 3rd October 2016. Following consultation with the relevant bodies, the Planning Inspectorate provided a scoping opinion in November 2016. The scoping opinion is provided in document 6.4 and is also available on the Planning Inspectorate website⁶.
125. The comments raised in the scoping opinion are outlined in the relevant technical chapters (Chapters 8 to 31) of the Norfolk Vanguard ES, Volume 1. Within Section 3 of each ES chapter, detail is provided on where the comment has been addressed within the ES or other submission documents.
126. Informal consultation in relation to the EIA and Habitats Regulations Assessment (HRA) is discussed in section 9.2.

7.2. Transboundary Screening

127. The Planning Inspectorate provided transboundary notification to EEA States regarding Norfolk Vanguard on the 16th February 2017. Five EEA States confirmed that they wish to participate in the procedure for examining the application: Denmark, Netherlands, Germany, France and Belgium (Appendix 7.1). In addition to this pre-application consultation, statutory transboundary consultation will be undertaken by the Planning Inspectorate in accordance with Regulation 32 of the EIA Regulations, if and when it accepts the Applicant's application for a DCO.

⁶ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010079/EN010079-000018-Scoping%20Opinion.pdf>

8. NON-STATUTORY CONSULTATION

8.1. Overview and introduction

128. This Chapter of the Consultation Report sets out the non-statutory "informal" consultation that the Applicant has engaged in prior to undertaking formal consultation activities as prescribed by the 2008 Act. This activity took place in conjunction with the key consultation milestones under the EIA regulations, as set out in Chapter 7 above.
129. Informal EIA and HRA consultation has been undertaken with regulators and their advisors through the Evidence Plan Process (EPP) and is discussed further in Chapter 9, as well as Sections 12.5, 13.5 and Chapter 25.
130. Non-statutory engagement with consultees also continued following formal consultation and this is summarised in Chapter 25 of the Consultation Report.

8.2. Guidance

131. DCLG guidance at paragraph 18 recognises that early involvement of local communities, local authorities and statutory consultees can bring about significant benefits for all parties, for example by helping the applicant identify and resolve issues at the earliest stage; enabling members of the public to influence proposed projects; helping local people understand the potential nature and local impact of the proposed project; and enabling potential mitigating measures to be considered.
132. It also notes, at paragraph 29, that applicants will often need detailed technical input from expert bodies to assist with identifying and mitigating the social, environmental, design and economic impacts of projects, and other important matters. Technical expert input will often be needed in advance of formal compliance with the pre-application requirements. Early engagement with these bodies can help avoid unnecessary delays and the costs of having to make changes at later stages of the process.

8.3. Vattenfall's approach to non-statutory consultation

133. As noted in Section 4.5, the Applicant has placed an emphasis on thorough and extensive non-statutory consultation and engagement to involve relevant consultees, stakeholders and communities in the development of the application proposals.
134. A number of phases of non-statutory community consultation were undertaken prior to the statutory consultation period which started in November 2017. This is summarised in the timeline below:



135. Initial meetings with key stakeholders took place from the first quarter of 2016 as detailed below. The purpose of these meetings was to introduce the Norfolk Vanguard and Norfolk Boreas projects prior to the public 'launch' of the proposals, which took place in Q3 2016.
136. The purpose of the early engagement and public launch of the project was to raise awareness of the proposals with the local communities in Norfolk and provide an opportunity for people to understand how they could get involved in the consultation process. The public launch also allowed the project to gather information on likely issues from local stakeholders, which was then used to shape the early stages of the project in the lead up to the scoping phase.
137. The non-statutory consultation also helped to inform the project team about the most effective ways to undertake consultation in this area. Consultation techniques and activities were tailored and refined following each stage of consultation with the aim of providing the most effective approach once it came to undertaking statutory consultation towards the end of 2017.
138. As part of the Applicant's commitment to ongoing and thorough non-statutory consultation and engagement with local communities and consultees in Norfolk, a dedicated project information line was set up from the point of project launch and throughout the development of the proposals. The information line is manned during office hours and has been advertised on all engagement and consultation material, including newsletters, the project website, exhibition boards and during community outreach activities.
139. In addition to this, a dedicated project email address (info@norfolkvanguard.co.uk) was created and has been included on all consultation and engagement material throughout the non-statutory and statutory consultation periods.

140. To encourage broad participation from as many potentially interested local residents, communities and groups as possible, the project issued a newsletter to all households, initially within half a kilometre of the Scoping Area, and later, following consultation on the SoCC, with relevant local planning authorities, within the Primary Consultation Zone, as defined in the SoCC. Newsletters were also published on the Norfolk Vanguard (and Norfolk Boreas) website and stakeholders were notified when a mailing occurred. The purpose of the newsletter is to highlight forthcoming consultation events and opportunities to take part in the consultation, and to keep local people informed about how their views are helping to shape the project.
141. During the consultation events, the Applicant asked people how they heard of the opportunity to take part in consultation events, and the results show that the newsletter was a significant factor in encouraging participation.
142. The table below provides a summary of the contents of the newsletters produced to date.

Table 8.1 Summary of newsletters issued and content

Date of issue (postal delivery to local homes)	Title & Main theme (s) of communication	Distribution
Prior to Phase I non-statutory consultation - October 2016	<p>Norfolk Vanguard Offshore Wind Farm:</p> <ul style="list-style-type: none"> • Introducing the project, including a map of the Scoping area. • Advertising seven drop-in events Phase 1 informal consultation. • Project timeline. • Contact details – how to get in touch. <p>The newsletter can be viewed in Appendix 12.4.</p>	All addresses within scoping area (approximately 35,300)
Prior to Phase II non-statutory consultation - March 2017	<p>Vattenfall in Norfolk:</p> <ul style="list-style-type: none"> • Norfolk Vanguard - a summary response to phase 1 consultation, alerting readers to: <ul style="list-style-type: none"> • ‘Hearing Your Views I’ (interim consultation report) • Project refinements (map – indicative cable corridor, landfall options; refined substation search area). • Responding to themes highlighted during the consultation, notably: potential environmental impacts and research; local benefits & opportunities; how cables are buried in order to minimise local impacts. • Advertising nine drop-in events for Phase 2 informal consultation – additional venues added, including in response to local requests from Reepham residents). 	All addresses within scoping area (approximately 35,300)

Date of issue (postal delivery to local homes)	Title & Main theme (s) of communication	Distribution
	<ul style="list-style-type: none"> • Highlighting start of environmental surveys. • Introduction to Norfolk Boreas. • Introduction to the Local Liaison Officer, and her special role as education and skills champion. • Contact details – how to get in touch. <p>The newsletter can be viewed in Appendix 13.2.</p>	
<p>Prior to Phase IIb non-statutory consultation - June 2017</p>	<p>Vattenfall in Norfolk:</p> <ul style="list-style-type: none"> • Norfolk Vanguard (and Boreas) - a summary response to phase 2 consultation, alerting readers to: <ul style="list-style-type: none"> • ‘Hearing Your Views II’ (interim consultation report). • Project refinements (description and mapping of refined indicative cable corridor, refined landfall search area and refined substation search area). • Responding to themes highlighted during the consultation, notably: wider project benefits; environmental considerations and the role of the environment manager. • Timeline and next steps. • Local liaison in the project area and responding to education and skills interests. • Contact details – how to get in touch. <p>The newsletter can be viewed in Appendix 14.1.</p>	<p>All addresses within scoping area (approximately 35,300)</p>
<p>Prior to statutory consultation - October 2017</p>	<p>Vattenfall in Norfolk:</p> <ul style="list-style-type: none"> • Norfolk Vanguard (and Boreas) – alerting residents to project updates ahead of the statutory consultation for Norfolk Vanguard – description & mapping (including detail of potential National Grid Substation extension works). • Advertising publication of the SoCC. • Advertising the forthcoming statutory consultation • Advertising eight drop-in events where participants can talk to team and review PEIR and consultation materials for Norfolk Vanguard. • Advertising nine information points where the PEIR could be reviewed (including hard copies). • Responding to themes of ongoing interest to consultees and communities writing to us: offshore constraints and opportunities; technology and innovation in the offshore wind industry, including transmission systems; ongoing commitment to jobs 	<p>All addresses within the Primary Consultation Zone, as specified in the SoCC (approximately 30,000)</p>

Date of issue (postal delivery to local homes)	Title & Main theme (s) of communication	Distribution
	<p>and skills agenda; visual aids to understanding potential impacts of the projects.</p> <ul style="list-style-type: none"> • Timeline. • Contact details – how to get in touch. • How to respond to the statutory consultation. <p>The newsletter can be viewed in Appendix 20.7.</p>	
<p>Post statutory consultation - February 2018</p>	<p>Vattenfall in Norfolk:</p> <ul style="list-style-type: none"> • Norfolk Vanguard - thanking participants for very high levels of participation during the statutory consultation and detailed information & reasoning provided. Summarising the Applicant’s response to statutory consultation feedback and local interests, through highlighting: <ul style="list-style-type: none"> • “Hearing Your Views III” (interim consultation report) • Project refinements (description and mapping of HVDC transmission system eliminating requirement for cable relay stations and describing other embedded mitigation resulting from this design decision, refined and narrowed cable corridor, including highlighting some changes to the red-line boundary following landowner consultation (for example near Reephams); long HDD at landfall to avoid impacts to Happisburgh beach and leisure/tourism activities, and substation refinements. • In addition to the above, highlighting progress on work relating to the jobs and skills agenda, including early work on supply chain development. • Timeline and next steps. • Contact details. <p>The newsletter can be viewed in Appendix 20.14.</p>	<p>All addresses within the Primary Consultation Zone, as specified in the SoCC (approximately 30,000)</p>

143. To complement and extend the non-statutory consultation and engagement exercises, the Applicant employed a full-time Local Liaison Officer (LLO) from January 2017. The LLO provides a locally based person, for the long term, as a point of direct and consistent contact for local communities and organisations with which to engage with. During early project development, the role of the LLO has been to reach out to the wider community and to encourage participation in the EIA process, including engagement with local community organisations and harder to reach groups. The

LLO's contact details are publicised on consultation and engagement materials. Further information on the role of the LLO can be found in Chapter 16.

144. The following chapters outline the various non-statutory consultation activities and how they shaped the development of the project at key milestones in the lead up to statutory consultation in 2017.

8.4. Social Media during the non-statutory consultation phases

145. Early on in project development (2016 – 2017) the focus of social media effort was to introduce the proposed Norfolk Vanguard (and later Norfolk Boreas) development, the developer, and the process for engagement with the project, helping to raise awareness of the project and inviting people to get involved. Early phases of consultation were highlighted, and people were directed to engage with the process in order to help shape the project. Traditional methods of communicating with local people, communities and stakeholders, and all materials shared with them, also signposted to additional digital sources of information, namely the project website and social media channels. This approach meant a variety of different options were open to interested parties, helping to establish effective communicative relationships, from the outset, via people's preferred channels. As the project progressed social media channels were then used to share project updates "as they happened" whenever it was possible, practical or appropriate to do so. This approach continues to date, alerting people to any 'news' that might be of interest.
146. Early social media activity in 2016 and 2017 focused predominantly on Twitter with sharing of content such as:
- Links to news articles on the project website providing a basic introduction to project proposals and to key personnel such as the Project Manager.
 - Introduction of the dedicated project hashtag #NorfolkVanguard to simplify identification and searching of relevant project information.
 - Sharing links to the relevant project page on the Planning Inspectorate (PINS) website.
 - Sharing links to digital copies of project documentation such as the Environmental Impact Assessment Scoping Report and project newsletters.
 - Directing interested parties to register for email updates on the project.
 - Providing initial information on the consultation process and presenting the different ways in which interested parties or stakeholders could influence and engage with the project.
 - Sharing details (dates, locations, times) of the series of drop-in exhibitions held in various communities in the consultation area and also sharing

information on alternative ways of accessing the material presented at the exhibitions for those unable to attend in person.

- Sharing links to online feedback surveys to enable those who didn't attend or didn't leave feedback to provide us with their comments on the materials presented at drop-in exhibitions.
- Links directing any supply chain participants to register for information.
- Introduction to the 3D model used to illustrate the project proposals.
- Sharing links to short animated video⁷ setting out conceptual models and early interpretations of the various elements of the wind farm proposals.
- News updates on key project design decisions such as commitments to underground cabling and changes to the search area for onshore cable corridor.
- Providing links to reports compiled from exhibition and early engagement feedback.

147. As relationships in Norfolk were built and the project team began responding actively to local interests and needs. For example the work of the LLO and Skills and Education Champion began to enable opportunities for local young people to learn more about offshore wind farms, or to undertake work experience with teams undertaking field surveys. This information was also shared on social media.

8.5. Stakeholder analyses

148. From the outset, the Applicant has sought to identify and engage with all relevant stakeholders to develop and refine the proposals through the development process. A full stakeholder list was developed and continues to be revised to ensure relevant contacts and organisations are kept informed on project progress and have the opportunity to feed into the development proposals.

149. A stakeholder mapping exercise was undertaken at the beginning of 2016, which identified relevant section 42 and section 47 stakeholders, individuals and organisations/groups across Norfolk including:

- Local, national and European politicians;
- Local authority officers;
- UK government;
- Regulators and statutory consultees;
- Businesses and business groups;

⁷ <https://youtu.be/fuqVqA7MEt8>

- Media;
- NGOs;
- Education (including schools, colleges and higher education groups);
- Land use/agriculture;
- Neighbouring communities;
- Religious groups;
- Special interest groups (including voluntary sector umbrella groups and harder to reach/seldom heard groups and organisations); and
- Other developers.

150. This key stakeholder list is included in Appendix 8.1.

9. THE EVIDENCE PLAN PROCESS AND PHASE 0 EARLY NON-STATUTORY TECHNICAL CONSULTATION

9.1. Evidence Plan Process (EPP) prior to section 42 consultation (Phase 0)

151. The EPP is a mechanism to help agree the information the Applicant needs to supply to PINS as part of the DCO application, specifically in relation to the Environmental Impact Assessment (EIA) and Habitat Regulations Assessment (HRA).
152. The EPP focusses on technical issues which are discussed within a range of expert topic groups, including ornithology, traffic and transport and archaeology. The process therefore involves statutory and non-statutory technical consultees, including local authorities, the Marine Management Organisation, Natural England and a range of non-governmental organisations including The Wildlife Trusts.
153. The Evidence Plan aims to assist all parties during the evolution of the proposed DCO application by:
- Giving greater certainty to all parties on the amount and range of evidence to be collected and presented within the application;
 - Helping address and agree issues earlier on in pre-application so robust, streamlined decisions can be taken and additional data can be collected if required;
 - Enabling time and resource requirements to be planned and optimised for all parties; and
 - Providing a platform to debate advice on one topic between multiple agencies.
154. The overarching aim of the EPP is to ensure that the EIA and HRA are completed in a way that is satisfactory to all parties involved. Terms of Reference (Appendix 9.1) were produced in consultation with the steering group (Section 9.3) to provide guidelines for the EPP.
155. A number of documents, such as method statements and survey methodologies, were provided to the expert topic groups for consultation. These documents relating to consultation prior to Section 42 (Phases 0 to II) are provided in Appendices 9.2 to 9.14.
156. Minutes from each meeting will form the basis for the Statements of Common Ground (SOCG) to be prepared with a number of technical consultees following submission. Minutes of meetings prior to Section 42 consultation are provided in Appendices 9.15 to 9.26.

157. In addition, informal consultation for the following EIA topic areas (for which there are long established EIA consultation processes) has been undertaken outside the EPP:

- Commercial Fisheries (section 9.5.1.17);
- Shipping and Navigation (section 9.5.1.18); and
- Aviation and Radar (section 9.5.1.19).

9.2. Consultation under the Habitats Regulations prior to Scoping Consultation (Phase 0)

158. In order to provide the competent authority with information to support the HRA process, the applicant has produced documentation and undertaken consultation with key stakeholders. This has been undertaken in combination with the EIA consultation through the EPP.

159. An offshore HRA Screening Report was submitted to relevant topic groups (marine mammals, benthic ecology, marine physical processes and offshore ornithology) as part of the EPP in June 2017.

160. The offshore and onshore HRA Screening Reports were provided as appendices to the Preliminary Environmental Information Report (PEIR) and are provided with the DCO application as Appendices 5.1 and 5.2 of the Information to Support HRA Report (document 5.3).

9.3. EPP Steering Group (Phase 0)

161. The Applicant explored the possibility of establishing a steering group to oversee the EPP, however following initial discussions it was agreed that this was no longer required. The initial Steering Group meetings were held with the Planning Inspectorate, the Applicant and their lead EIA Consultant, Norfolk County Council, MMO, and Natural England. Table 9.1 provides an overview of the Norfolk Vanguard steering group meetings.

Table 9.1 Consultation under the EPP Steering Group

Date	Contact Type	Organisation	Topic
21 st March 2016	Steering Group Meeting	The Planning Inspectorate, Natural England, Marine Management Organisation (MMO).	Introduction of the applicant and the project. Overview of the EPP.
20 th September 2016	Steering Group Meeting	The Planning Inspectorate, Natural England, MMO.	Project update and overview of the topic group meetings.

9.4. Expert topic groups prior to Scoping Consultation (Phase 0)

162. To discuss the detail of relevant EIA topics, separate groups of technical experts were convened from relevant organisations. These groups met at a frequency determined by the needs of the project which emerged through the development of the proposals.
163. These groups had the following functions:
- Agree the relevance, appropriateness and sufficiency of data for the specific assessment (including both site specific and contextual, determine whether to continue or halt specific survey work and/or analysis);
 - Agree the methods for data analysis;
 - Agree worst case parameters for the assessments;
 - Agree methods for assessments (including, where possible, interpretation of impact and levels of significance); and
 - Agree whether, and when, to change the evidence requirements and collect additional evidence, including how this should be collected and analysed, updating the plan and timetable as necessary.
164. The EPP is divided into the following Expert Topic Group (ETGs) which follow the topics covered by the EIA and HRA:
- Offshore:
 - Marine Physical Processes (nearshore and offshore);
 - Offshore Ornithology;
 - Water and Sediment Quality;
 - Benthic and Intertidal Ecology;
 - Marine Mammal Ecology;
 - Fish and Shellfish Ecology; and
 - Offshore Archaeology.
 - Onshore:
 - Onshore ecology (including onshore ornithology);
 - Onshore Water Quality, Water Framework Directive (WFD) and Flood Risk;
 - Traffic and Transport;
 - Air Quality;
 - Noise;
 - Health Impact Assessment;
 - Socio-Economics;
 - Tourism and Recreation;

- Onshore Archaeology;
- Landscape; and
- Land Use.

165. A summary of ETG meetings and key correspondence is provided in Table 9.2.

Table 9.2 Consultation under the EPP ETGs prior to scoping consultation (Phase 0)

Date	Contact Type	Organisation	Topic
4 th March 2016	Email	To MMO	Provision of the proposed benthic survey methodology.
7 th March 2016	Email	To MMO and Natural England	Provision of ornithological data analysis and survey strategy.
18 th March 2016	Email	From MMO and Cefas	Advice on benthic survey scope and EIA data sources.
21 st March 2016	Steering Group Meeting	The Planning Inspectorate, Natural England and MMO	Evidence Plan Process kick off meeting (minutes provided in Appendix 9.15).
21 st March 2016	Benthic and Geophysical Survey Scope Meeting	Natural England and MMO	Discussions on the required scope of the benthic surveys (and agreement that no further fish surveys were required) to inform the approach to the offshore surveys in Summer/Autumn 2016. A marine licence exemption notice was submitted in May 2016 following discussions with relevant navigation and nature conservation authorities (minutes provided in Appendix 9.16).
21 st March 2016	Offshore Ornithology and Marine Mammals Survey Scope Meeting	Natural England and MMO	Discussion on the required aerial survey methodology (minutes provided in Appendix 9.17).
21 st March 2016	Letter	From Natural England	Review of Benthic Survey Scope.
21 st March 2016	Letter	From Natural England	Review of ornithological survey strategy.
11 th April 2016	Email	From MMO and Cefas	Comments from Cefas' Fisheries Team on proposed benthic survey scope.
13 th April 2016	Email	From MMO and Cefas	Feedback on benthic survey methodology.
20 th April 2016	Letter	From Natural England	Review of potential landfall sites.
20 th April 2016	Letter	From Natural England	Review of the Geophysical and Grab Sampling Impact Assessment.
26 th April 2016	Email	From MMO and Cefas	Comments on contaminant sampling strategy.

3 rd May 2016	Email	From MMO and Cefas	Comments from Cefas' Benthic Team on proposed benthic survey scope.
9 th May 2016	Email	To MMO and Natural England	Confirmation that flying bird flight height data was collected.
8 th June 2016	Email	From MMO	Agreement on proposed benthic survey area.
8 th August 2016	Email	To Natural England and Norfolk County Council	Draft Onshore Winter/Passage Bird Survey Scoping Report (Appendix 23.1 of the ES).
5 th September 2016	Email	From Norfolk County Council	Comments on draft survey specification for wintering / autumn and spring passage bird survey.
15 th September 2016	Email	From Natural England	Comments on draft survey specification for wintering/autumn and spring passage bird survey.
20 th September 2016	Steering Group Meeting	The Planning Inspectorate, Natural England and MMO	EPP update (minutes provided in Appendix 9.15).

9.5. Early Non-statutory consultation and project development dialogue (Phase 0)

166. As well as engagement with technical consultees through the EPP, there has been ongoing correspondence and meetings (as detailed below) with a range of organisations, groups and individuals in relation to the EIA outside the EPP. This includes early meetings with consultees involved in the EPP prior to the start of this process. It also includes ongoing dialogue with stakeholders regarding EIA topics not included in the EPP, for example discussions with oil and gas operators and fishermen.
167. Further consultation was undertaken with these bodies (e.g. through informal EIA consultation (Chapters 8 to 17) and formal consultation (Chapters 19 and 22)).
168. These early engagements are grouped and outlined below:

9.5.1.1. Norfolk County Council

169. The Norfolk Vanguard project was first presented to Norfolk County Council (NCC) in March 2016. The potential socio-economic benefits to the county, the NSIP process and potential issues which would need to be addressed in any application documentation were the main points of discussion. NCC's role within the EPP was also considered. NCC's Natural Environment Team was supplied with the onshore bird survey specification and fed comments back in September 2016. Council members' briefings were held in April and September 2016.

Table 9.3 Phase 0 consultation with Norfolk County Council

Date	Contact Type	Organisation	Topic
14 th March 2016	Meeting	Norfolk County Council, North Norfolk District Council, Great Yarmouth Borough Council	Introduction to Norfolk Vanguard; economic benefit and UK content; useful contacts; NSIP process; potential issues.
15 th March 2016	Email	To Norfolk County Council	Draft Terms of Reference for EPP.
22 nd March 2016	Email	From Norfolk County Council	Review of minutes from meeting of 14 th March 2016 and comments on EPP and Member Briefing.
20 th April 2016	Meeting	Norfolk County Council	Presentation of the Applicant's strategy and development plan for Norfolk Vanguard including socio economics, evidence plan process and consultation.
21 st April 2016	Email	From Norfolk County Council	Scoping proforma and contacts with NCC.
27 th June 2016	Meeting	Norfolk County Council	Briefing to update members on the project.
9 th September 2016	Meeting	Norfolk County Council and District Councils Planning/Development Control Team meeting with Dong/Ørsted and the Applicant	Vattenfall and Dong/Ørsted each provided introductory project overviews and focused on DCO process and submission timescales.

9.5.1.2. Local Planning Authorities

170. The Norfolk Vanguard project was first presented to the following local planning authorities in March 2016, with follow-up meetings held during the course of 2016. Meetings and correspondence was held with:

- North Norfolk District Council
- Broadland District Council
- Breckland District Council
- Great Yarmouth Borough Council

171. Proposals for a beach topographic survey and the required permissions were discussed with North Norfolk District Council (NNDC) in Q4 2016. This consultation with local authorities is shown in Table 9.4.

Table 9.4 Phase 0 consultation with local authorities

Date	Contact Type	Organisation	Topic
11 th March 2016	Letter	To North Norfolk District Council (NNDC), Great Yarmouth Borough Council (GYBC), Breckland District Council (BreDC), Broadland District Council (BroDC)	Formal launch of Norfolk Vanguard.
14 th March 2016	Meeting	NCC, NNDC, GYBC	Introduction to Norfolk Vanguard; economic benefit and UK content; useful contacts; NSIP process; potential issues.
26 th July 2016	Site visit	Environment Agency, NNDC	Review of landfall options; data sources; land ownership.
29 th July 2016	Email	To Environment Agency, NNDC	Data sharing; land ownership at foreshore; public exhibitions.
16 th August 2016	Meeting	BreDC	Introduction to the project.
17 th August 2016	Meeting	NNDC	Introduction to the project.
18 th August 2016	Meeting	BroDC	Introduction to the project.
13 th September 2016	Meeting	GYBC	Update on the project.
22 nd September 2016	Meeting (phone)	NNDC	Proposed beach topographic survey.

9.5.1.3. Suffolk County Council

172. The Norfolk Vanguard project was presented to Suffolk County Council (SCC) which is the adjoining county to the project, in March 2016 with a follow-up meeting in April 2016. The importance of UK content and the need for this to be reflected in the supply chain strategy and socio-economic assessment were discussed.

Table 9.5 Phase 0 consultation with Suffolk County Council

Date	Contact Type	Organisation	Topic
11 th March 2016	Letter	To Suffolk County Council	Formal launch of Norfolk Vanguard.
21 st April 2016	Meeting	Suffolk County Council	Introduction to Norfolk Vanguard; UK content; useful contacts.

173. Further engagement with SCC was not required following these initial meetings as, due to the distance between the proposed project and SCC's boundary, SCC expressed their preference not to be involved in further EPP meetings. SCC was,

however, invited to participate in all stages of formal and informal consultation and responded accordingly (see Chapter 22 for responses to the statutory consultation).

9.5.1.4. Environment Agency

174. The Norfolk Vanguard project was presented to the Environment Agency (EA) in March 2016 with follow-up meetings in May and June 2016.

Table 9.6 Phase 0 consultation with Environment Agency

Date	Contact Type	Organisation	Topic
11 th March 2016	Letter	To Environment Agency (EA)	Formal launch of Norfolk Vanguard.
3 rd May 2016	Meeting (phone)	EA	Introduction to Norfolk Vanguard.
28 th June 2016	Meeting	EA	Planning process; Evidence Plan Process; EA remit.
14 th July 2016	Meeting (phone)	EA	Landfall issues and preferences; areas of responsibility.
26 th July 2016	Site visit	EA, NNDC	Review of landfall options; data sources; land ownership.
29 th July 2016	Email	To EA, NNDC	Data sharing; land ownership at foreshore; public exhibitions.

9.5.1.5. Norfolk Wildlife Trust

175. The project was presented to Norfolk Wildlife Trust on 22nd November 2017 following contact at the October 2017 public drop-in-days.

Table 9.7 Phase 0 consultation with Norfolk Wildlife Trust

Date	Contact Type	Organisation	Topic
11 th March 2016	Letter	To The Wildlife Trusts, Norfolk Wildlife Trust	Formal launch of Norfolk Vanguard.

9.5.1.6. Marine Management Organisation (MMO) and Centre for Environment, Fisheries and Aquaculture Science (Cefas)

176. Throughout project development, there was regular contact with the MMO and, where specific advice was required, Cefas. The Applicant's plans for the northern half of the former East Anglia zone and the formal launch of Norfolk Vanguard were presented in the first quarter of 2016.

Table 9.8 Phase 0 consultation with MMO and CEFAS

Date	Contact Type	Organisation	Topic
14 th January 2016	Meeting	MMO	Introduction to strategy for northern half of zone; potential project phasing; planned surveys; scoping; licences required.
11 th March 2016	Letter	To MMO	Formal launch of Norfolk Vanguard.

Date	Contact Type	Organisation	Topic
24 th May 2016	Proforma	To MMO	Norfolk Vanguard Geophysical and Benthic Survey: Notification of an exempt activity (updated on 11 th August 2016 and 27 th September 2016).

9.5.1.7. Historic England

177. The Norfolk Vanguard project was presented to Historic England on 26th January 2016. There was further correspondence in relation to the geoarchaeological assessment of the vibrocores collected during the offshore geophysical survey in Summer/Autumn 2016 and agreement on the methodologies to be undertaken.

Table 9.9 Phase 0 consultation with Historic England

Date	Contact Type	Organisation	Topic
26 th January 2016	Meeting	Historic England	Introduction to Norfolk Vanguard and Evidence Plan Process; contacts within Historic England and other organisations; offshore data collection.
11 th March 2016	Letter	Historic England	Formal launch of Norfolk Vanguard.

9.5.1.8. Happisburgh Archaeology Steering Group

178. Consultation was undertaken with archaeological specialists associated with Happisburgh, including the Natural History Museum, British Museum, Queen Mary University of London, Norfolk County Council and North Norfolk District Council. A meeting was held on 2nd May 2017 to discuss the Happisburgh South landfall location and potential archaeological opportunities during the Phase II non-statutory consultation period (See section 13.5.1.1).

9.5.1.9. The Royal Society for the Protection of Birds (RSPB)

179. Prior to the start of the Evidence Plan Process, in the first quarter of 2016, the Applicant's plans for the northern half of the former East Anglia zone and the formal launch of Norfolk Vanguard were presented.

Table 9.10 Phase 0 consultation with the RSPB.

Date	Contact Type	Organisation	Topic
16 th March 2016	Meeting	RSPB	Introduction to strategy for northern half of zone; data sources; approach to assessment; potential mitigation.
11 th March 2016	Letter	To RSPB	Formal launch of Norfolk Vanguard.

9.5.1.10. Whale and Dolphin Conservation (WDC)

180. The Norfolk Vanguard project was presented to WDC in June 2016 with a follow-up meeting in September 2016. WDC attended an APEM-lead workshop on aerial survey and analysis methods, providing feedback to recommend support of the methods as a viable alternative to boat-based surveys for marine mammals.

Table 9.11 Phase 0 consultation with WDC

Date	Contact Type	Organisation	Topic
20 th June 2016	Letter	To WDC	Formal launch of Norfolk Vanguard
15 th September 2016	Meeting	WDC	Introduction to Norfolk Vanguard and Evidence Plan Process; marine mammal data collection; impacts of piling; harbour porpoise SAC

9.5.1.11. Natural England

181. The Norfolk Vanguard project was presented to Natural England in January 2016. Regular engagement with Natural England has taken place throughout project development.

Table 9.12 Phase 0 consultation with Natural England

Date	Contact Type	Organisation	Topic
21 st January 2016	Meeting	Natural England	Introduction to Norfolk Vanguard and Evidence Plan Process; contacts within NE; routing through designated sites; impacts on breeding birds; harbour porpoise; SAC; planned surveys.
22 nd January 2016	Email	Natural England	Hornsea Project 2 Kittiwake advice from Natural England.
11 March 2016	Letter	To Natural England	Formal launch of Norfolk Vanguard.
22 nd March 2016	Letter	From Natural England	Advice on contacts within Natural England.
9 th September 2016	Email	From Natural England	Advice regarding early engagement with fishermen.

9.5.1.12. Eastern Inshore Fisheries Conservation Authority (Eastern IFCA)

182. The Norfolk Vanguard project was presented to the Eastern IFCA in March 2016 with follow-up meetings in October 2016.

Table 9.13 Phase 0 consultation with the Eastern IFCA

Date	Contact Type	Organisation	Topic
11 th March 2016	Letter	To Eastern IFCA	Formal launch of Norfolk Vanguard.

Date	Contact Type	Organisation	Topic
31 st May 2016	Email*	From Eastern IFCA	Request for ports and information on fishing areas and seasonality.

*Correspondence with Brown and May Marine

9.5.1.13. The Wildlife Trusts

183. The Norfolk Vanguard project was presented to The Wildlife Trusts (TWT) in March 2016 with follow-up meetings in June and November 2016. The TWT attended an APEM-lead workshop on aerial survey and analysis methods, providing feedback regarding the methods and the ability to identify marine mammals and seeking further clarity on digital methods. The project was presented to Norfolk Wildlife Trust (NWT) on 22nd November 2016 following contact at the October public drop-in-days. NWT has since provided information on potential County Wildlife Sites (CWS) along the proposed onshore cable route.

Table 9.14 Phase 0 consultation with The Wildlife Trusts

Date	Contact Type	Organisation	Topic
11 th March 2016	Letter	TWT / NWT	Formal launch of Norfolk Vanguard.
28 th June 2016	Meeting	TWT	Introduction to Norfolk Vanguard and Evidence Plan Process; contacts within WT and NWT; scoping.

9.5.1.14. Joint Nature Conservation Committee

184. The Norfolk Vanguard project was presented to the Joint Nature Conservation Committee (JNCC) in March 2016. Natural England then confirmed via email that as they have full delegation, JNCC need not be involved in the EPP process. Natural England may take advice from JNCC as required.

185. JNCC attended an APEM-lead workshop on aerial survey and analysis methods, providing feedback regarding the methods and seeking further clarity on absolute densities. A presentation on piling noise mitigation measures was provided to JNCC in relation to proposed management measures for the harbour porpoise SAC.

Table 9.15 Phase 0 consultation with JNCC

Date	Contact Type	Organisation	Topic
11 th March 2016	Letter	To JNCC	Formal launch of Norfolk Vanguard.

9.5.1.15. Oil and gas operators

186. As oil and gas (existing and planned) is a potential constraint to development in the northern half of Zone 5, early discussions were held with asset owners prior to finalising the development area. Tullow Oil confirmed that the Horne and Wren platforms would be decommissioned in 2015/2016 and no interaction was therefore

expected. A meeting with Perenco was held in July 2015 which provided information on the planned decommissioning of a number of Perenco assets within the next 5 years. The potential for co-existence and resource sharing was discussed. ENI confirmed that it owns oil and gas rights within a number of licence blocks overlapping Norfolk Vanguard East (these blocks had previously been owned by Jetex). Exploratory drilling is now planned for 2018. Opportunities for siting the CRS within or adjacent to Bacton Gas Terminal were discussed with Shell in early 2017.

Table 9.16 Phase 0 consultation with oil and gas bodies

Date	Contact Type	Organisation	Topic
21 st May 2015	Email	Tullow Oil	Horne and Wren platforms to be removed in 2015/2016 therefore no conflict envisaged.
8 th July 2015	Meeting	Perenco	Understanding Interactions with Zonal development Plan.
23 rd July 2015	Meeting	ENI	Understanding Interactions with Zonal development Plan; exploratory drilling originally planned for 2016.

9.5.1.16. Other commercial operators

187. As is noted in Chapter 6 the Applicant has undertaken to engage closely with other commercial operators throughout the consultation process. Ongoing engagement with Ørsted has occurred, alongside contact with ScottishPower Renewables (SPR).

9.5.1.17. Commercial fisheries

188. Meetings have been held with local individual fishermen and local fishermen’s organisations as well as with national bodies, including the National Federation of Fishermen’s Organisation and the MMO Fisheries Department. Dutch, Belgian and French fisheries organisations have also been contacted to further understand transboundary impacts.

Table 9.17 Phase 0 consultation with fishermen and fishermen’s organisations

Date	Contact Type	Organisation	Topic
31 st May 2016	Letter*	Sea Palling Fishermen's Association	Requesting contact and information on fishing areas and seasonality.
6 th June 2016	Meeting*	Richard Clarke, Andy Williamson, Paul Lines,	Introduction to project. Fishermen provided charts of fishing grounds and amounts of gear. Identified key fishermen who could be impacted.
8 th June 2016	Letter*	Gavin Whatling	Requesting information on fishing activities and locations. FLO contact details.
10 th June 2016	Email*	Nicola Gaff - NNFS	Introduction of project and outlining survey.

Date	Contact Type	Organisation	Topic
13 th June 2016	Meeting*	Billy Gaff, Andy Williamson, John Davies, Gavin Whatling (NNFS)	Presentation on the development. Discussion of numbers of vessels and locations of fishing grounds.
15 th June 2016	Letter*	Paul Lines	Charts of survey area.
15 th June 2016	Meeting*	Stephen Sheales	Identification of fishing grounds and number of pots.
17 th June 2016	Meeting*	Mark Wright	Identification of fishing grounds and number of pots.
22 nd June 2016	Meeting	NFFO	Introduction to the project.
12 th July 2016	Meeting*	Stephen Sheales	To discuss fishing grounds and proposal for survey.
12 th July 2016	Meeting*	Billy Gaff	To discuss fishing grounds and proposal for survey.
12 th July 2016	Meeting*	Paul Lines	Meeting to discuss fishing grounds and upcoming survey.
15 th July 2016	Email*	Billy Gaff	Clarifying fishing grounds and survey updates.
18 th July 2016	Meeting*	Richard Clarke	Fishing grounds and methods.
19 th July 2016	Meeting*	Richard Clarke	Identification of key grounds for both FV Heidi and Two Boys.

* Correspondence with Brown and May Marine⁸

9.5.1.18. Shipping and navigation

189. Meetings have been held with a number of consultees and organisations with technical expertise on shipping and navigation. In addition to individual meetings, a workshop was arranged to facilitate discussion on the project and provide relevant information. These meetings and engagement activity are set out in the table below.

Table 9.18 Phase 0 consultation with shipping and navigation organisations

Date	Contact Type	Organisation	Topic
24 th May 2016	Email and Teleconference	Maritime and Coastguard Agency and Trinity House	Agreement on Marine Traffic Survey Methodology

9.5.1.19. Aviation and radar

190. Consultation with potentially affected stakeholders has been ongoing throughout the development of the former East Anglia zone. During 2014, section 42 consultation was undertaken in relation to East Anglia THREE (a project situated directly south of Norfolk Vanguard East (NV East)) with NATS, the Ministry of

⁸ Brown and May Marine (BMM) is a specialist UK fisheries consultant. BMM is undertaking engagement and consultation with relevant fishermen and fishermen's organisations in relation to the project.

Defence (MOD), the National Air Traffic Management Advisory Committee (NATMAC), transboundary stakeholders, offshore helicopter operators supporting the oil, gas and renewable energy industries and Search and Rescue (SAR) operations.

191. Consultation with these stakeholders regarding the Norfolk Vanguard project has built on existing information and understanding from previous projects in the area. Meetings and engagement with the Ministry of Defence (MOD) have been ongoing throughout 2017 and into 2018. The following table provides the dates and method of engagement with aviation stakeholders during the early period of development of the project:

Table 9.19 Phase 0 consultation with aviation and radar organisations

Date	Contact Type	Organisation	Topic
4 th June 2015	Email	Vattenfall to the MOD (DIO)	Provision of turbine and boundary coordinates within East Anglia (North).
June 2015	Report	NATS	NATS Technical and Operational Assessment (TOPA) Report delivered to Vattenfall.
25 th August 2015	Report	Serco Limited	Mitigation Modelling Report for the EA (North) Windfarm.
8 th March 2016 – 9 th May 2016	Numerous Emails	Vattenfall to MOD (DIO)	Request for information of the progress of the assessment by DIO of the provided Serco Mitigation Report and expected date of response from DIO.
9 th August 2016 and 25 th August 2016	Email	Osprey to MOD (DIO)	Request for response from DIO to the submitted Serco Mitigation Modelling Report.
7 th September 2016	Email	FROM: MOD (DIO) To Vattenfall	Invitation to attend a meeting at DIO on 26 th September 2016 to discuss East Anglia North mitigation modelling report and the MOD conclusion regarding its acceptability.
26 th September 2016	Meeting	DIO	Response from DIO of submitted Serco Mitigation Modelling Report. See Appendix 9.27 for meeting notes.

9.6. Summary of technical consultee engagement during Phase 0 non-statutory consultation

192. The outcome of the Phase 0 early technical meetings and engagement was primarily to introduce the project to consultees and establish effective means of communication and ongoing communications channels.

193. The key points raised during all technical meetings and correspondence with technical consultees are detailed in each technical chapter (7 to 31) of the ES, with responses showing how each comment has been addressed or an explanation of why they cannot be addressed.

Appendices 9.15 to 9.26 provide the minutes of all EPP meetings undertaken prior to the statutory consultation period.

10. NON-STATUTORY CONSULTATION WITH LANDOWNERS

10.1. Introduction – Overview of the Applicant’s approach during Phase 0

194. Under section 42 of the Act, the Applicant is required to consult all those with an interest in land to which the application relates including owners, lessees, tenants, occupiers and those able to sell or release the land.
195. In order to correctly identify potentially affected parties, consultation with landowners has been ongoing since early 2016 and throughout the progression of the project, principally through the Applicant’s land agent, Consents Solutions.
196. During the course of the Phase 0 non-statutory consultation period, the Applicant sought to identify all relevant affected or potentially affected landowners in advance of the Phase I non-statutory consultation period in October 2016.
197. The following early meetings and engagement were also held.

Table 10.1 Phase 0 consultation with landowner organisations

Date	Contact Type	Recipients	Topic
7 th September 2016	Meeting	NFU	Project introduction.
23 rd September 2016	Email	NFU	Update in relation to scoping report & PIDs.

198. Throughout the non-statutory consultation periods, the Applicant has undertaken numerous further consultations and ongoing engagement with potentially affected landowners. Further information about engagement and consultation with landowners and relevant organisations is included in Section 12.6 (Phase I non-statutory consultation) and Section 13.6 (Phase II non-statutory consultation). Details of the statutory consultation undertaken under section 42 with landowners can be found in Section 19.3.

11. PHASE 0 ENGAGEMENT WITH LOCAL COMMUNITIES

11.1. Introduction

199. In line with the Applicant's approach to consultation with the local communities within which it operates, extensive and consistent engagement across Norfolk has taken place since the plans were made public in March 2016.
200. Information was provided and meetings sought with local community groups and organisations, as well as parish councils alongside meetings with technical consultees and Local Authorities, as outlined in Chapter 9 above.
201. Early engagement took place between March 2016, and October 2016 (i.e. following the launch of the project in the public domain, but prior to the first phase of consultation on the Scoping Area). This early engagement centred around introducing Vattenfall as a company to key community stakeholders, as well as providing an overview of the proposed Norfolk Vanguard and Norfolk Boreas projects.
202. During this period, the intention was to inform local communities about the forthcoming consultation on the projects, establish lines of communication and make stakeholders aware of the feedback and communication mechanisms (such as the information line and project email address). This early engagement also served to help shape the non-statutory consultation processes, and the type of information that would be presented for feedback.

11.2. A public project launch

203. In March 2016, the Applicant made a public announcement to launch the project and raise its profile amongst local communities in Norfolk. This project launch involved production of a press release, the project website being made live and the provision of points of contact for interested parties to seek information about the proposals.
204. Letters to stakeholders and technical consultees were issued on 11th March 2016 providing information about the project launch and the forthcoming consultation. This letter can be found in Appendix 11.1. A list of recipients that received the letter can be found in Appendix 11.2.
205. A press release was issued on 14th March 2016 setting out the background to the project. This press release can be found in Appendix 11.3.

206. The project website (www.vattenfall.co.uk/norfolkvanguard) was made live to coincide with the press release and contained the same information, along with a frequently asked questions document (FAQ).⁹
207. An information line number (01603 567995) and a dedicated project email address (info@norfolkvangaurd.co.uk) was also made live and advertised on the press release and project website.

11.3. Meetings held

208. A list of the early meetings and engagement undertaken with relevant groups, representatives and organisations is set out below.

11.3.1.1. Local representatives

209. The Applicant felt it was important to undertake early meetings with local representatives in order to introduce them to the project and to provide background information on the Applicant, its operations and its experience. These meetings were undertaken concurrently, and in addition to the meetings outlined in Chapter 9 above, with relevant local planning authority representatives.

210. Below is a table outlining the early engagement the Applicant held with local representatives.

Table 11.1 Phase 0 consultation with local representatives

Date	Contact Type	Representative	Topic
19 th April 2016	Meeting	South Norfolk District Council	General discussion providing an update on the status of the project.
20 th April 2016	Meeting	Norfolk County Council	General discussion providing an update on the status of the project.
21 st April 2016	Meeting	Suffolk County Council	General discussion providing an update on the status of the project.
23 rd June 2016	Meeting	Clive Lewis MP	Introduction to the project, its history and potential grid connections.
29 th June 2016	Meeting	Norwich City Council	General discussion providing an update on the status of the project.
16 th August 2016	Meeting	Breckland District Council	General discussion providing an update on the status of the project.
17 th August 2016	Meeting	North Norfolk District Council	General discussion providing an update on the status of the project.

⁹ The FAQ document has evolved over the course of the project and has been updated to reflect the latest information and in response to the types of questions being asked by the local community. Appendix 4.2 contains copies of the different FAQ documents showing how they have evolved over the course of the pre-application process.

Date	Contact Type	Representative	Topic
18 th August 2016	Meeting	Broadland District Council	General discussion providing an update on the status of the project.
18 th August 2016	Meeting	The Broads Authority	Introduction to the project.
8 th September 2106	Meeting	Great Yarmouth Borough Council	General discussion providing an update on the status of the project.
8 th September 2016	Meeting	Norfolk County Council	Members Briefing.
9 th September 2016	Meeting	Norfolk County Council	Development Management Meeting.

11.3.1.2. Local community organisations and groups

211. As well as local representatives, the Applicant also felt that it was important to undertake early engagement with local community organisations and groups.
212. A number of meetings were held with local groups prior to the commencement of the non-statutory consultation process. These meetings are outlined in the table below.

Table 11.2 Phase 0 consultation with Local Community Organisations and Groups

Date	Contact Type	Organisation	Topic
19 th April 2016	Meeting	Norfolk Chamber of Commerce	Introduction to the project
28 th June 2016	Meeting	New Anglia Local Enterprise Partnership (LEP)	Introduction to the project
29 th June 2016	Meeting	Norfolk Community Foundation	Discussion around potential future opportunities for joint working
8 th September 2016	Meeting	National Farmers' Union (NFU)	Introduction to the project

12. PHASE I NON-STATUTORY CONSULTATION PERIOD (SCOPING CONSULTATION)

12.1. Introduction and Scope of Consultation

213. The first phase of non-statutory consultation took place in October 2016 and was aimed at seeking views from consultees, communities and stakeholders within the scoping area.
214. The purpose of this phase of consultation was to:
- Introduce Vattenfall within the region;
 - Introduce the Norfolk Vanguard project;
 - Promote and gauge the level of enthusiasm for offshore wind within the region;
 - Begin to establish relationships with local people that will help us shape the best possible project for the area; and
 - Seek feedback on scoping information in order to help refine the proposals and identify a narrower proposed cable route corridor.

12.2. Consultation format

215. During this phase of the non-statutory consultation period the Applicant utilised a variety of methods in order to inform key stakeholders and local residents across the scoping area about the project, the opportunities for them to attend events to learn more about the proposals and how they could ask any questions or provide initial feedback to the project team.
216. This phase of consultation aligned with the Scoping Consultation (further information in Chapter 7). The information contained within the Scoping Request submitted to PINS formed the basis for the consultation.
217. At the commencement of the consultation period all relevant local authorities, town and parish councils within the scoping area and also those immediately adjacent to the scoping area were invited via letter and email to the public exhibitions being held. These invitations were issued on 17th October 2016. A copy of this letter can be found in Appendix 12.1. A full list of consultees that were issued this letter can be found in Appendix 12.2. In addition to this, major local business and community groups within the region were also notified of the exhibitions via the Norfolk Chamber of Commerce.
218. In order to inform local residents of the commencement of the consultation period, and to provide information about the upcoming events, community newsletters

were issued to 35,319 individual addresses within the scoping area. This was issued to local residents on 17th October 2016. A map of the Scoping Area, and those included within the mailing area, is available to view in Appendix 12.3. A copy of the newsletter, which was sent to local residents, is available to view at Appendix 12.4.

219. A press release was issued on Thursday 6th October 2016 announcing that the Applicant was seeking views from technical specialists, local authorities, public agencies and local residents about the scope of assessment that will support understanding of the project’s environmental impact through a series of exhibition events. The press release was issued to the Eastern Daily Press. The press release included;
- Background information about the project;
 - Information about the extent of consultation being undertaken by the Applicant;
 - Specific details and information for the public exhibition events being held between Tuesday 18th October and Saturday 29th October.
220. Examples of the coverage achieved by the press release are available to view at Appendix 12.5.
221. In addition to a press release, the exhibition events in Norwich and Great Yarmouth were also advertised via a flyer. A copy of the flyer is available to view at Appendix 12.6.
222. Public exhibitions were held across the scoping area between Tuesday 18th October 2016 and Saturday 29th October 2016 in order to provide an informal yet structured space over a defined period of time, which allowed local communities to find out about the Applicant, the project proposals, and contribute their views.
223. The table below provides further information about the locations and timings of the public exhibition events held during Phase I of the Non-statutory Consultation period.

Table 12.1 List of Public Exhibition Events

Date	Location	Exhibition Venue	Start Time	Close
Tuesday 18 th October 2016	Aylsham	Town Hall, Market Place, Aylsham, Norwich NR11 6EL	2pm	6.30pm
Wednesday 19 th October 2016	Happisburgh	Wenn Evans Community Centre, Blacksmiths Lane, Happisburgh, Norwich, NR12 0QY	2pm	6.30pm

Date	Location	Exhibition Venue	Start Time	Close
Thursday 20 th October 2016	Dereham	Dereham Memorial Hall, 62A Norwich St, Dereham NR19 1AD	2pm	6.30pm
Friday 21 st October 2016	Necton	Necton Village Hall, Tuns Road, Swaffham, Norfolk, PE37 8EH	2pm	6.30pm
Saturday 22 nd October 2016	North Walsham	North Walsham Community Centre, New Road, North Walsham NR28 9DE	11am	4pm
Friday 28 th October 2016	Great Yarmouth	Great Yarmouth Borough Council Town Hall, Great Yarmouth, Norfolk NR30 2QF	2pm	6.30pm
Saturday 29 th October 2016	Norwich	Norwich City Hall, St Peters St, Norwich NR2 1NH	11am	4pm

224. A total of 788 people attended across the seven public exhibition events. There was a higher number of participants of middle age and older (51+) and more males than females attended the events and responded to the feedback form. Of those who attended the exhibition older people tended to come in the day, with slightly younger people attending the events in the evenings.

225. Project team members, including technical and environmental experts, were on hand at the drop-in events to answer questions and explain the material, maps and early stage digital animation on display. Exhibition boards were also produced to provide more detailed information on the following issues and topics such as:

- General information about Vattenfall, its background and operations;
- How participants could leave comments and provide feedback on what they had seen and heard at the exhibition event;
- An introduction to the Norfolk Vanguard project;
- The benefits of renewable energy and its role in tackling climate change;
- How an offshore windfarm operates and produces electricity, as well as information on the necessary onshore infrastructure;
- The development consent process and an initial timeline of the necessary stages, as well as the project’s status as a Nationally Significant Infrastructure Project (NSIP);

- Background information on the Environmental Impact Assessment (EIA) process, and the key characteristics of this;
- Offshore factors to be investigated as part of the EIA;
- The site selection process for the proposed onshore infrastructure and the steps which would be taken to identify the most suitable cable route, landfall location, cable relay station location and onshore project substation location within the identified scoping area. In detail the Applicant consulted upon:
 - Any features relevant to the EIA and site selection process in relation to each of three sectors within the landfall search area;
 - Any features relevant to the EIA and site selection process in relation to each of three sectors within the cable relay station search area; and
 - Any features, concerns or ideas relevant to the EIA and site selection process in relation to each of five sectors¹⁰ within the onshore project substation search area
- The next steps for land surveying and process for contacting potentially affected landowners;
- The benefits of the project, including the economic, jobs, supply chain and skills opportunities which would be created;
- A request for participants to highlight any key issues which may not have been addressed previously on the exhibition materials, and;
- Information about how to get in touch with the project team via post, online, email or phone.

226. At the exhibition events some of the display materials were grouped together, if more than one board covered a theme and encouraged discussion around each of these, allowing space for people to gather and look at materials collectively. Maps were often the most popular displays, which people gathered around to review and explore, in discussions with each other and staff, the issues raised.

¹⁰ Sector 5 describes an area with a radius of 1km around the existing 400kV National Grid Substation. Sectors 1-4 describe areas within a search area having a radius of 3km around the existing 400kV National Grid Substation. See exhibition boards in Appendix 12.7 for further information.

227. A copy of the exhibition boards, which were displayed during at the events held during Phase I of the non-statutory consultation, are available to view at Appendix 12.7.
228. Further meetings with key community stakeholder groups and stakeholders also took place during this period. These are summarised in the table below:

Table 12.2 List of meetings during Phase I of the non-statutory consultation

Date	Contact Type	Organisation	Topic
31 st January 2017	Meeting	Norfolk Coast Project AONB	Project update.
7 th February 2017	Meeting	Great Yarmouth Borough Council	Project update, early warning of Phase II informal consultation, introduction to Local Liaison Officer (LLO).
7 th February 2017	Meeting	Norfolk County Council	Environment, Development and Transport Committee presentation.
8 th February 2017	Meeting	Norfolk County Council	Project update, early warning of Phase II informal consultation, introduction to LLO.
8 th February 2017	Meeting	Breckland District Council	Project update, early warning of Phase II informal consultation, introduction to LLO.
8 th February 2017	Meeting	North Norfolk District Council	Project update, early warning of Phase II informal consultation, introduction to LLO.
2 nd March 2017	Meeting	Norfolk County Council (Children's Services)	Early conversation on skills development, apprenticeships & Vattenfall Skills Strategy for Norfolk.
16 th March 2017	Meeting	Norfolk Wildlife Trust	Attendance at Norfolk Wildlife Trust Communities and Nature meeting. Provide update on the project.
28 th March 2017	Meeting	North Norfolk Coastal Forum	Project update presentation.

12.3. Gathering feedback

229. In addition to allowing stakeholders and local residents to learn more about the Applicant and the project, the public exhibitions also sought to gather written comments from participants, which contributed to evidence gathering. To this end, participants were encouraged to feed-back their initial thoughts, comments or questions on the project either using direct conversations with staff, or via the comprehensive feedback form, which was available at all exhibition events and online on the project website (www.vattenfall.co.uk/norfolkvanguard).

230. Local residents, stakeholders, and other interested parties were also able to provide feedback and request further information via a dedicated information line number. The telephone number used (01603 567 995) was in operation Monday-Friday between the hours of 8:30am and 5:30pm. Outside of these hours a message facility was available for voicemails to be left, and responded to at the earliest opportunity, to ensure information was readily available and queries or concerns addressed.
231. Information was given to callers, where possible and if questions were of a technical nature, these were passed on to project team members.
232. A dedicated consultation email address was also established to allow residents, stakeholders and interested parties to provide feedback and request further information. The email address, info@norfolkvanguard.co.uk, was monitored by members of the project team. Again, where questions or requests for further information were of a technical nature, these were passed on to relevant consultants within the project team.
233. Postage paid envelopes were also provided at the exhibition events in order to allow attendees to complete the feedback form away from the event and send it back to the project team.
234. Flipchart paper with relevant open questions was also positioned next to the exhibition display boards covering themes or topics, in order to allow exhibition attendees to immediately provide their initial comments and details of their discussions. This method of feedback collection also sought to allow attendees to view the comments of others, perhaps challenging or supporting their own thinking, including participants who attended earlier in the day. At the event participants were encouraged to respond to comments that others may have already made, build on them, agree or disagree, giving reasons. The questions which were asked in this format included:
- ‘Offshore works – what we consider – have we missed anything you’d like to add?’
 - ‘Onshore works – the site selection process – have we missed anything you’d like to add?’
 - ‘Finding the best underground cable route – your comments and thoughts?’
 - ‘Finding the best landfall location – your comments and thoughts?’
 - Finding the best relay station location – your comments and thoughts?’

- Finding the best substation location – your comments and thoughts? **N.B:** This question was dealt with differently at the Necton exhibition given that it was the drop-in closest to the project’s connection point with the existing National Grid 400KV substation near Necton. At the Necton event exhibition attendees were asked to give their thoughts on each of the five sectors which were being considered in the earliest review of this topic. This allowed people to give more detailed answers.
- Bringing value and opportunity to the area – what ideas do you have?

235. In addition to the feedback, which was collected at the exhibition events through the discussions with local residents and the comments made on the flipcharts, 105 detailed written feedback forms were returned by attendees.

12.4. Additional materials

236. A 3D Model was created for the purposes of engaging effectively with stakeholders at all levels, ranging from local residents to politicians, without the need to interpret large quantities of technical data, plans, contour maps and other more traditional forms of presentation. The model helps solve complicated visual impact problems by improving communication, removing ambiguity and increasing understanding of proposed developments throughout the design, planning and stakeholder consultation phases.
237. The North Vanguard model covers a large area of North Norfolk from Swaffham in the west to Wells-Next-The-Sea on the north coast, along the coast as far down as South Wold and inland to Thetford in the south west, an area of approximately 5,600 sq. km. In addition to the land mass the model extends out to sea covering the proposed windfarms of Vanguard and Boreas across an area of 1,500 sq. km.
238. The model is created using data from Ordnance Survey, Lidar scans (of the cable corridor) and aerial imagery at 1m and 50cm resolution to form a high level of detail across the whole area. The model is further enhanced by a number of high detailed areas at key locations such as landfall, cable crossings and potential sites for substations. Overlaid onto the model and selectable by the user are a large number of constraints including the Marine Conservation Zone, oil and gas pipelines, overhead lines, water courses and protected nature areas all of which helped shape the plan for the cable route.
239. The 3D model was available to view at the public information days and a member of the project team was on hand to assist attendees in using the model.
240. The project website (www.vattenfall.co.uk/norfolkvanguard) was also updated throughout Phase I of the non-statutory consultation period. The community

newsletter, exhibition display boards, and a feedback form were all made available to view and download from the project website.

12.5. Meetings and engagement with technical consultees during Phase I non-statutory consultation

12.5.1.1. Consultation under the EPP ETGs

241. In addition to the non-statutory consultation undertaken with local communities, the EPP ETGs continued to meet and discuss the project. The following meetings were held during this period (October 2016 to March 2017).

Table 12.3 – Meetings and engagement with EPP ETGs during Phase 1

Date	Contact Type	Organisation	Topic
6 th October 2016	Email	To Historic England	Update on the offshore survey and vibrocore analysis.
18 th November 2016	Email	To Natural England and Norfolk County Council	Provision of the amended Onshore Winter/Passage Bird Survey Scoping Report following comments on the survey specification (provided in Appendix 23.1 of the ES).
14 th January 2017	Email	To the Environment Agency, Natural England Norfolk County Council, Norfolk Wildlife Trust, North Norfolk District Council and Broadland District Council	Provision of the Onshore Ecology and Ornithology Method Statement (provided in Appendix 9.3).
14 th January 2017	Email	To Highways England, Norfolk County Council, North Norfolk District Council, Breckland Council and Broadland District Council	Provision of the Traffic and Transport, Air Quality and Noise Method Statements (Appendix 9.4).
14 th January 2017	Email	To Breckland Council, North Norfolk District Council, Norfolk County Council, Natural England AONB, Environment Agency, Natural England and Broadland District Council	Provision of the Land Use, Socio-Economics and Tourism, and Health Impact Assessment Method Statements (Appendices 9.5, 9.6 and 9.7).
14 th January 2017	Email	To Norfolk County Council, Norfolk Rivers Internal Drainage Board, Anglian Water, Environment Agency and Water Management Alliance	Provision of Water Resources and Flood Risk and Onshore Ground Conditions Method Statements (provided in Appendix 9.8).

Date	Contact Type	Organisation	Topic
20 th January 2017	Email	To Norfolk County Council	Provision of the Noise Method Statement (Appendix 9.9) and Onshore Ecology/Ornithology Method Statement (provided in Appendix 9.3).
20 th January 2017	Email	To Norfolk County Council	Provision of the air quality (Appendix 9.10).
24 th January 2017	Landscape, Land use, Health Impact Assessment, Socio-economics and Tourism Scoping Expert Topic Group Meeting	Norfolk County Council, Broadland District Council, Breckland Council, Natural England and Environment Agency	Project introduction, development of site selection and project design, and approach to EIA
24 th January 2017	Onshore Ecology and Ornithology Scoping Expert Topic Group Meeting	Norfolk County Council, Natural England Norfolk Wildlife Trust, Breckland Council, and Environment Agency	Project introduction, development of site selection and project design, and approach to EIA (minutes provided in Appendix 9.19).
25 th January 2017	Water Quality, WFD, Flood Risk, Land Quality and Geology Scoping Expert Topic Group Meeting	Environment Agency, Norfolk County Council, and Anglian Water	Project introduction, development of site selection and project design, and approach to EIA (minutes provided in Appendix 9.20).
25 th January 2017	Traffic & Transport, Air Quality and Noise Scoping Expert Topic Group Meeting	Norfolk County Council, Breckland Council, and Broadland District Council	Project introduction, development of site selection and project design, and approach to EIA (minutes provided in Appendix 9.21).
25 th January 2017	Email	To Historic England and Norfolk County Council	Provision of the offshore and onshore Archaeology Method Statements Appendices 9.11 and 9.12).
1 st February 2017	Onshore Archaeology Scoping Expert Topic Group Meeting	Historic England and Norfolk County Council	Project introduction, development of site selection and project design, and approach to EIA (minutes provided in Appendix 9.22).
1 st February 2017	Offshore Archaeology Scoping Expert Topic Group Meeting	Historic England and Norfolk County Council	Project introduction, development of site selection and project design, and approach to EIA (minutes provided in Appendix 9.23).
1 st February 2017	Offshore Ornithology Expert Topic Group Meeting	Natural England and RSPB	Discussion on the draft Offshore Ornithology PEIR Chapter (minutes provided in Appendix 9.17).
2 nd February 2017	Email	From Historic England	Historic England feedback on the Offshore Archaeology Method Statement.

Date	Contact Type	Organisation	Topic
2 nd February 2017	Email	To MMO, Natural England The Wildlife Trust and WDC	Provision of the Marine Mammals Method Statement (Appendix 9.13).
2 nd February 2017	Email	To The Wildlife Trust, Natural England MMO and Environment Agency	Provision of the Benthic Ecology, Fish, Marine Physical Processes, Marine Water Quality and Sediment Quality Method Statements (provided in Appendix 9.2).
3 rd February 2017	Email	To Natural England and RSPB	Provision of the Offshore Ornithology Method Statement (Appendix 9.14).
9 th February 2017	Email	From Broadland District Council	Advice to consider magnetic field that is emitted from the onshore cables and structures.
15 th February 2017	Marine Mammals Scoping Expert Topic Group Meeting	Natural England The Wildlife Trust, Whale and Dolphin Conservation (WDC) and Cefas	Discussion of the scoping responses and approach to EIA/HRA (minutes provided in Appendix 9.24).
15 th February 2017	Offshore Ornithology Scoping Expert Topic Group Meeting	Natural England and RSPB	Discussion of Scoping responses and approach to EIA/HRA (minutes provided in Appendix 9.17).
16 th February 2017	Benthic and Intertidal Ecology, Fish Ecology, Marine Physical Processes and Marine Water and Sediment Quality Scoping Expert Topic Group Meeting	Natural England MMO, Environment Agency, Cefas, Eastern Inshore Fisheries Conservation Authority (EIFCA) and The Wildlife Trust	Discussion of Scoping responses and approach to EIA/HRA (minutes provided in Appendix 9.16).
27 th February 2017	Traffic and Transport Expert Topic Group Meeting	Highways England	Discussion of Scoping responses and approach to EIA (minutes provided in Appendix 9.21).
27 th February 2017	Email	From Natural England	Natural England's position on Haisborough, Hammond and Winterton SAC.

12.5.1.2. Consultation on EIA outside the EPP with stakeholders and consultees

242. Further meetings were held during this period (October 2016 to March 2017) with technical stakeholders and consultees. These meetings are set out below, and further information on earlier meetings held during Phase 0 non-statutory consultation is contained in Chapter 9. Meetings and engagement held following publication of the PEIR are recorded in Section 19.6, and in Chapter 25.

12.5.1.3. Local Planning Authorities

Table 12.4 Engagement with Local Authorities during Phase II non-statutory consultation

Date	Contact Type	Organisation	Topic
14 th October 2016	Email	To North Norfolk District Council (NNDC)	Information on proposed beach topographic survey.
18 th November 2016	Email	From Norfolk County Council (NCC)	Regarding briefing and Q and A session; understanding of site selection criteria; Bacton sandscaping scheme and coastal erosion concerns.
9 th March 2017	Email	From NNDC	Deep History Coast Project.

12.5.1.4. Norfolk Wildlife Trust (NWT)

Table 12.5 Engagement with Norfolk Wildlife Trust during Phase II non-statutory consultation

Date	Contact Type	Organisation	Topic
22 nd November 2016	Phone call	NWT	Introduction to Norfolk Vanguard and Evidence Plan Process.

12.5.1.5. Whale and Dolphin Conservation (WDC)

Table 12.6 Engagement with Whale and Dolphin Conservation during Phase II non-statutory consultation

Date	Contact Type	Organisation	Topic
10 th November 2016	Meeting	WDC, WT, JNCC, NE	APEM organised workshop on digital aerial surveys.
16 th November 2016	Email	WDC	Comments on APEM workshop including image quality and quality assurance process.

12.5.1.6. Natural England

Table 12.7 Engagement with Natural England during Phase II non-statutory consultation

Date	Contact Type	Organisation	Topic
14 th October 2016	Email	From Natural England	Confirmation that proposed beach topographic surveys can be undertaken.

12.5.1.7. The Wildlife Trusts

Table 12.8 Engagement with Wildlife Trusts during Phase II non-statutory consultation

Date	Contact Type	Organisation	Topic
10 th November 2016	Meeting	WDC, TWT, JNCC, NE	APEM organised workshop on digital aerial surveys.

Date	Contact Type	Organisation	Topic
21 st November 2016	Phone call	TWT	Comments on APEM workshop.
22 nd November 2016	Phone call	NWT	Introduction to Norfolk Vanguard and Evidence Plan Process.
24 th November 2016	Meeting	TWT	Update on Norfolk Vanguard and Evidence Plan Process; role of WT at national level; impact on Marine Conservation Zone (MCZ) and harbour porpoise SAC; further feedback from APEM marine mammal workshop.

12.5.1.8. Joint Nature Conservation Committee

Table 12.9 Engagement with Joint Nature Conservation Committee during Phase II non-statutory consultation

Date	Contact Type	Organisation	Topic
2 nd November 2016	Email	From Natural England	Confirmation that NE will represent all SNCBs for English offshore wind farms.
10 th November 2016	Meeting	WDC, WT, JNCC, Natural England	APEM organised workshop on digital aerial surveys.
29 th November 2016	Phone call	JNCC	Comments on APEM workshop.
12 th December 2016	Meeting	JNCC	Presentation on Piling Noise Mitigation Measures; Practical Implications and Experiences.
12 th December 2016	Email	From JNCC	Response to presentation and clarity on who to contact regarding wider industry issues in relation to the harbour porpoise SAC.

12.5.1.9. Oil and gas operators

Table 12.10 Engagement with oil and gas operators during Phase II non-statutory consultation

Date	Contact Type	Organisation	Topic
12 th October 2016	Meeting (phone)	ENI	2016 exploratory drilling postponed; unlikely to drill until 2018.
18 th January 2017	Meeting	Perenco	Update on development plans; landfall constraints; decommissioning programme; separation requirements; Norfolk Boreas geophysical survey.
19 th January 2017	Email	Perenco	Photo of partial decommissioning at Bacton Gas Terminal.

Date	Contact Type	Organisation	Topic
17 th February 2017	Meeting (phone)	Shell	Shell assets; opportunities for siting infrastructure within or close to Bacton gas terminal; environmental data sharing; site visit.

12.5.1.10. Commercial Fisheries and fishermen’s organisations

Table 12.11 Engagement with commercial fisheries and fishermen’s organisations during Phase II non-statutory consultation

Date	Contact Type	Organisation	Topic
19 th October 2016	Meeting	MMO	Local fishing activity in relation to Vanguard.
29 th November 2016	Meeting	Rederscentrale	Belgian fishing activity in relation to Vanguard.
14 th February 2017	Meeting	VisNED	Dutch fishing activity in southern North Sea and specifically in relation to Vanguard.

12.5.1.11. Aviation and radar organisations

Table 12.12 Engagement with aviation and radar organisations during Phase II non-statutory consultation

Date	Contact Type	Organisation	Topic
4 th October 2016	Email	From MOD (DIO) to Osprey	Clarification of DIO position post meeting and confirmation of agreement for DIO to model scenarios.
18 th October 2016	Email	From Osprey to the MOD (DIO)	Submission of ‘worst case scenario’ drawings, coordinates and GIS Shapefiles for four test scenarios for DIO Modelling.
16 th November 2016	Email	From the MOD (DIO) to Osprey	Results of DIO Modelling of four test scenarios.
13 th December 2016	Email	From Osprey to the MOD (DIO)	Request for future meeting with DIO during February 2017.
13 th December 2016	Email	From the MOD (DIO) to Osprey	Reply from DIO stated that they believe that a meeting ahead of any required technical and operational assessment of the revised SERCO Report would be premature.

12.6. Phase I consultation with landowners

243. Information sharing and discussions with landowners has been ongoing since the selection of the National Grid connection point at Necton.

244. Engagement with landowners during Phase I non-statutory consultation focused initially on potential locations for the cable relay station, areas around the proposed new project substation near Necton and the broad onshore cable scoping area. These landowners were identified and engaged with during the non-statutory consultation undertaken in October 2016.
245. All identified landowners were invited to participate in the consultation through provision of information and, where possible, consultation materials (including the newsletter).
246. During this period, survey access was sought for a range of route options over a wide corridor. Landowners and other interested parties were identified initially through title searches with the Land Registry. Where ownership could not be determined, site visits were conducted by the Applicant’s appointed land referencing agents, Ardent. The site visits involved identifying and visiting potential landowner residences and discussions with neighbours and other local residents to try and identify landowners. Contact was also made with landowners via telephone, email and letter. Discussions were held by Consents Solutions with adjoining landowners to further identify unregistered land holdings. A copy of the letter issued during this period can be found in Appendix 12.9.
247. The following meetings with landowner organisations also took place during this period.

Table 12.13 Consultation with organisations

Date	Contact Type	Recipients	Topic
12 th October 2016	Email	CAAV	Introduction to project and copy of newsletter with consultation details.
13 th October 2016	Email	CLA	Introduction to project and copy of newsletter with consultation details.
6 th January 2017	Email	NFU/CLA/ CAAV	Project Update.
20 th January 2017	Email	NFU/CLA/ CAAV	Project update copy of survey letter and possible route plan.

12.7. Feedback and key issues raised in Phase I

248. Following the conclusion of Phase I of the non-statutory consultation the Applicant compiled a summary report of the feedback received during the consultation. The Summary Report provides a snapshot of the range of views and comments that were gathered, both at the events, with comments written on flip charts, and from 105 completed feedback forms. This report was subsequently uploaded to the project website (www.vattenfall.co.uk/norfolkvanguard).

249. The key themes identified in the feedback provided during Phase I of the non-statutory consultation period include:

Offshore works, marine and coastal issues

The questions on this issue did not prompt a significant number of comments about marine and coastal issues relative to the questions relating to onshore works. In part this is possibly because the project is located more than 47 km offshore, and for many this unfamiliar and unseen environment is not one that concerns them as much as areas closer to home. However, responses did express concerns about the possible impact on marine life and habitats as a result of installation of the offshore wind farm. Comments included topics such as:

- Possible negative impacts on food supply for foraging sea birds;
- Impact of noise on marine mammals - during construction and operation;
- Effect on newly designated Cromer chalk reef MCZ;
- Impact on erosion sensitive coastal area; and
- How will you liaise with fishing community? Fishing Businesses need advance warning of any works (incl. surveying).

Further comments about coastal issues appeared on several flipcharts relating to onshore works, and the landfall search area in particular. Many of these comments related to coastal protection, coastal tourism and habitat and wildlife concerns. However, there were also some comments drawing attention to the “Happisburgh Footprints”.

Finding the best landfall location

Responses on this issue suggested that the landfall siting should be as close as possible to Bacton. Other responses highlighted concerns about whether the strict security at Bacton might impact on project construction.

Some responses on this issue suggested landfall should be located near Happisburgh, however others sought to emphasise existing issues with coastal erosion in this area and concerns that siting landfall here would exacerbate this issue.

Finding the best cable relay station location

In relation to the location of the proposed cable relay station (CRS), most concerns highlighted in feedback responses were about visual impact, tourism impact and noise.

Finding the best underground cable corridor

A significant amount of interest was generated on this issue, given the initial scope of the proposed underground cable corridor. General comments referred to how works might be undertaken.

Other responses sought to highlight concerns about the potential disruption caused during the construction phase, with issues such as the damage caused to local roads, the need to include farmers in discussions on drainage, and the impact of cable storage on the local roads all being cited by respondents.

Consultees with land interests at this point provided feedback in relation to cable corridor construction techniques and how to maintain soil structure and manage drainage issues effectively. These initial conversations fed into the onshore cable corridor construction design.

Finding the best possible substation location

This topic generated the most feedback at the Necton drop-in, specifically. Attendees at this drop-in event were asked to comment on the suitability of each of the 5 sectors located within a 3km radius of the existing 400KV National Grid substation near Necton. A significant proportion of the people who participated in this drop-in event, expressed their objection to the proposal for a substation near this location and asked “why Necton?”. Further information about issues raised and a description of the regard had to those issues by the Applicant can be found in Chapter 17. However, respondents provided valuable information, including on issues that have caused distress during the construction of the existing infrastructure and subsequent mitigation works.

A number of other comments were received regarding the suitability of some sectors over others. Most people who expressed a preference with respect to the best location for the onshore project substation, suggested that new infrastructure should be located close to (within 1km) of the existing 400KV National Grid substation near Necton. A number of respondents indicated where they did not wish to see additional infrastructure; namely to the west and north of the existing National Grid substation, around Little Dunham and Little

Fransham, and not approaching closer to the village of Necton itself.¹¹ The Applicant also received some suggestions about locating the onshore project substation to the east of the village of Necton, where there are fewer homes.

Responses received during Phase I of the non-statutory consultation expressed a wide range of concerns about the siting of the substation. Of these, the dominant concerns related to permanent visual and noise impact, fears about the effect of electrical infrastructure and EMF close to homes and disruption during construction.

Bringing value and opportunity to the area

A range of responses were received on this, many of which were related to training and skills development and providing jobs for the future.

Issues such as the inclusion of young people in training and apprenticeship schemes, school places, obtaining skilled workers from the local area and the projected increase in local employment levels were all raised in relation to this issue.

250. There were also comments about the opportunities to learn more about the area as part of the EIA and during the construction phase, particularly the opportunity to understand archaeological remains along the whole project route. Respondents also sought to emphasise local matters when responding on this issue, for example at Happisburgh people asked about the possibility of coastal protection and at Necton there were many expressions of interest in improved local infrastructure and access, such as improvement to the A47 access and alleviating the “eyesore” that is the old petrol station on the A47 by ease of access onto and off the main road.
251. A review of all feedback form responses, and notes made by participants at the drop-in exhibitions was recorded in a full report of the drop-in events (‘Hearing Your Views I’).
252. The contributions of local people and stakeholders were considered in detail by the project team and helped inform the identification of a refined search area for environmental surveying to further investigate options for the proposed location of landfall, the cable relay station, underground cables and onshore project substation to connect into the national grid at the existing 400kV National Grid substation near Necton.

¹¹ For full breakdown of feedback, please see ‘Hearing Your Views I’, in Appendix 3.1.

253. Community feedback helped to define the keyhole¹² shaped onshore project substation search area focusing on sectors closer to the existing National Grid substation and to the east of it. See Chapter 4 of the ES for further information.

¹² See board 8a of Phase II exhibition boards in Appendix 12.8.

13. PHASE II NON-STATUTORY CONSULTATION PERIOD (REFINING THE PROJECT)

13.1. Introducing Phase II of the Non-Statutory Consultation

254. The second phase of non-statutory consultation took place in March 2017 and provided consultees, communities and stakeholders with more detailed information on elements of the project.
255. The purpose of this phase of consultation was to:
- Re-introduce the Norfolk Vanguard project and formally introduce the Norfolk Boreas project to the local community;
 - Demonstrate to the public how the plans have evolved and how the feedback from the last round of public drop-ins affected the plans;
 - Display the refined plans for Norfolk Vanguard and Norfolk Boreas; and
 - Seek public comments and feedback on how to improve the project design and consultation processes.
256. Following Phase I of the non-statutory consultation undertaken by the Applicant, the initial scoping area was significantly refined to an identified cable route corridor (see Chapter 4 of the ES for further information). However, despite this refinement, the Applicant was keen to ensure that all households within the project Scoping Area were kept informed of the latest phase of non-statutory consultation and the exhibition events.

13.2. Consultation format

257. During this phase of the non-statutory consultation period the Applicant again utilised a variety of methods in order to inform key stakeholders and local residents across the scoping area about the project, the opportunities for them to attend events to learn more about the proposals and how they could ask any questions or provide initial feedback to the project team.
258. At the commencement of the consultation period all councils within the refined consultation area and also those immediately adjacent to this area were invited to the public exhibitions being held via letter and email. These invitations were issued on 6th March 2017. In addition to this, major local business and community groups, as well as local colleges and secondary schools within the region, were also notified of the exhibitions as well as the Norfolk Chamber of Commerce. For a copy of this notification please see Appendix 13.1.

259. In order to inform local residents about the commencement of the second phase of consultation, and to provide information about the upcoming events, a community newsletter was issued to 35,319 individual addresses within the original scoping area. This was issued to local residents on 6th March 2017. A map of the scoping area, (i.e. the mailing area) is available to view in Appendix 12.4. A copy of the newsletter, which was sent to local residents publicising the Phase II of the non-statutory consultation, is available to view at Appendix 13.2.
260. In addition to the newsletters the Applicant also notified all those who had attended the previous round of exhibitions during Phase I of the non-statutory consultation in October 2016 and had provided an email address. Other parties who had provided an online contact address, who had expressed an interest in the project and the exhibition events and their timings were also updated via an e-newsletter.
261. Notifications of Phase II of the non-statutory consultation period and the public exhibition events were also issued to a number of parish councils for publication in newsletters or wider circulation. These include;
- Bacton and Edingthorpe Parish Council;
 - Colby and Banningham;
 - East Ruston Parish Council;
 - Happisburgh Parish Council;
 - Lessingham and Hempstead with Eccles Parish Council;
 - North Walsham Town Council;
 - Necton Parish Council;
 - Reepham Town Council;
 - Suffield Parish council;
 - Swanton Morley Parish Council; and
 - Walcott Parish Council.
262. A press release was issued on Monday 6th March 2017 announcing that the Applicant had refined the proposed cable route ahead of the next round of public exhibition events. The release also announced that the proposed cable corridor would cater for both the Norfolk Vanguard project and Norfolk Boreas project. The press release was issued to the Eastern Daily Press. The press release included:

- Background information about the project, and the previously identified Scoping Area;
- Information about the next stage of consultation being undertaken by the Applicant; and
- Information about how the Norfolk Vanguard and Norfolk Boreas projects inter-relate, and an announcement that these projects would share the same underground cable corridor.

263. Examples of the coverage achieved by the press release are available to view at Appendix 13.3.
264. In addition to the press release, Phase II of the non-statutory Consultation period and details of the exhibition events were also advertised in the Eastern Daily Press on Sunday 19th March 2017 in both its print and online editions. An advert was also placed in the Great Yarmouth Mercury, and was covered in both its online and print editions on Friday 24th March 2017. A copy of the press advert is available to view at Appendix 13.4.
265. Public exhibitions were held across the refined consultation area between Monday 20th March 2017 and Saturday 1st April 2017.
266. As with the first phase of non-statutory consultation the exhibitions provided stakeholders and local residents with an opportunity to contribute their views and to meet with and ask questions of members of the project team.
267. The following table provides further information about the locations and timings of the public exhibition events held during Phase II of the non-statutory consultation period.

Table 13.1 List of public exhibition events during Phase II of the non-statutory consultation

Date	Location	Exhibition Venue	Start Time	Close
Monday 20 th March 2017	Dereham	Dereham Sixth Form College, Crown Road, Dereham, NR20 4AG	1pm	7pm
Tuesday 21 st March 2017	Norwich	St Andrews & Blackfriars Hall, St Andrews Hall Plain. Norwich, NR3 1AU	1pm	7pm
Wednesday 22 nd March 2017	Aylsham	Aylsham Town Hall, Market Place, Aylsham, NR11 6EL	1pm	7pm
Thursday 23 rd March 2017	Happisburgh	Happisburgh Village Hall, Blacksmiths Lane, Happisburgh, NR12 0QY	1pm	7pm

Date	Location	Exhibition Venue	Start Time	Close
Friday 24 th March 2017	Necton	Necton Village Hall, Tuns Road, Necton, PE37 8EH	1pm	7pm
Saturday 25 th March 2017	North Walsham	North Walsham High School, Spenser Avenue, North Walsham, NR28 9HZ	11am	4.30pm
Thursday 30 th March 2017	Reepham	Reepham Town Hall, Church Street, Reepham, NR10 4WD	1pm	5.30pm
Friday 31 st March 2017	Great Yarmouth	Great Yarmouth Assembly Rooms, Town Hall, Hall Plain, Great Yarmouth, NR30 2QF	1pm	7pm
Saturday 1 st April 2017	Bacton	Bacton Village Hall, Coast Road, Bacton, NR12 0ES	11am	4.30pm

268. A total of 884 people attended across the nine public exhibition events. There was a 12% increase in attendance at the exhibitions in Phase II of the non-statutory consultation compared with Phase I. At the events attendees were asked whether they had heard about the Applicant before the events in order to gauge the effectiveness of the previous phase of non-statutory consultation in introducing Vattenfall to the public. In total 72% of attendees stated that they had heard about the Applicant before the events.
269. According to the analysis of the returned feedback forms a higher number of participants in Phase II of the non-statutory consultation were middle age and older (51+), and more males than females attended the events, and responded to the feedback form.
270. As with Phase I of the non-statutory consultation project team members, including technical and environmental experts, were on hand at the exhibition events to answer questions and explain the material, maps and answer any questions. Each drop-in exhibition maintained a relatively similar layout, with minor adjustments made depending on the space available. A separate set of exhibition boards were also produced for Phase II of the non-statutory consultation to provide more detailed information on the following issues and topics such as:
- General information about Vattenfall, its background and operations;
 - How participants could leave comments and provide feedback on what they had seen and heard at the exhibition event;
 - An introduction to the Norfolk Vanguard and Norfolk Boreas projects;

- The need for the project, the benefits of renewable energy and its role in tackling climate change;
- A timeline of key milestone for the project and Norfolk Boreas proposals, and the inter-relationship between the two;
- Background information on the Environmental Impact Assessment (EIA) process, and the key characteristics of this;
- Visual imagery portraying the exact geographic location of the project and the Norfolk Boreas proposals;
- The geophysical and environmental surveys being undertaken to enhance understanding of Offshore elements;
- The criteria guiding the site selection process for the proposed onshore infrastructure and how the search areas for this infrastructure had been refined;
- The factors and feedback considered during the refinement of the search areas for the landfall and CRS sites, and the next steps in the identification and selection processes¹³;
- Further information on the process for bringing power ashore at landfall, and the Horizontal Directional Drilling (HDD) which would be employed;
- The layout and dimensions of the proposed CRS sites, as well as a 3D visualisation of this;
- Additional information about the refined search area for the underground cable corridor¹⁴, and the proposed HVAC and HVDC cable technologies;
- The revisions and refinements which had been made in the identification of the onshore project substation location¹⁵, as well as 3D visualisations of both the HVAC and HVDC options;

¹³ Phase II consulted upon features stakeholders considered relevant to the EIA and site selection process within the three refined landfall search areas and seven refined cable relay station search areas. Further information on this can be found on Board 6a of the Phase II exhibition boards in Appendix 12.8.

¹⁴ Phase II consulted upon features stakeholders considered relevant to the EIA and site selection process within the refined 200m cable route corridor. Further information on this can be found on Board 7a of the Phase II exhibition boards in Appendix 12.8.

¹⁵ Phase II consulted upon features, concerns and ideas stakeholders considered relevant to the EIA and site selection process within the refined (keyhole shaped) onshore project substation search area. Further information on this can be found on Board 8a of the Phase II exhibition boards in Appendix 12.8.

- The Applicant's commitment to engaging with landowners, and a timeline for the evolving dialogue with affected parties;
 - The benefits of the project, including the economic, jobs, supply chain and skills opportunities which would be created;
 - Further information on offshore wind generation and the environmental benefits of this method;
 - A request for participants to highlight any key issues which may not have been addressed previously on the exhibition materials; and
 - Information about the next steps for the project, including how to get in touch with the project team via post, online, email or phone.
271. At the exhibition events some of the display materials were grouped together, if more than one board covered a theme and encouraged discussion around each of these, allowing space for people to gather and look at materials collectively. Maps were often the most popular displays, which people gathered around to review and explore the issues raised in discussions with each other and staff.
272. A copy of the exhibition boards which were displayed during at the events held during Phase II of the non-statutory consultation are available to view at Appendix 12.8.

13.3. Gathering Feedback

273. In addition to providing stakeholders and local residents with further detail on the ongoing EIA process and the refined cable corridor route and onshore infrastructure search areas, the public exhibitions sought to gather further written comments from participants which informed the next stage of project-shaping and decision-making. Participants were again encouraged to feed back their thoughts, comments or questions on the project either using direct conversations with staff, or via the comprehensive feedback form which was available at all exhibition events and online on the project website (www.vattenfall.co.uk/norfolkvanguard). The feedback form can be found in Appendix 12.8.
274. Postage paid envelopes were provided at the exhibition events in order to allow attendees to complete the form away from the event and send it back to the project team.
275. The deadline for providing feedback, Friday 19 May 2017, was clearly indicated on the feedback form.

276. In total, 268 feedback forms were returned during Stage Two of the non-statutory consultation period. This represented a significant increase (155%) in the levels of feedback achieved during Phase I of the non-statutory consultation, which saw 105 feedback forms returned.

13.4. Additional materials

277. The 3D model created for the first stage of informal consultation was updated to reflect the refined proposals and made available at exhibition events for people to view.

278. Maps were often the most popular displays at the October 2016 exhibition events during Phase I on the non-statutory consultation period. The Applicant therefore provided additional large-scale maps for Phase II of the non-statutory consultation in order to allow attendees to gather around to review, and to explore the issues raised in discussions with other attendees and project team members.

279. In addition to this an interactive map was produced for Phase II of the non-statutory consultation. This allowed attendees to;

- Navigate around the refined scoping area for themselves, or direct a member of staff to help them navigate around this area;
- Zoom-in and -out of the project proposals, review detail whilst also being able to gain an overview of the project;
- Help attendees understand and explore the context of how the proposed locations of aspects of the project inter-related.

280. The project website (www.vattenfall.co.uk/norfolkvanguard) was also updated throughout Phase II of the non-statutory consultation period. The community newsletter, exhibition display boards, and feedback form were all made available to view and download from the project website.

13.5. Meetings and engagement with Technical Consultees during Phase II non-statutory consultation

13.5.1.1. Phase II consultation under the EPP ETGs

281. In addition to the non-statutory consultation undertaken with local communities, the EPP ETGs continued to meet and discuss the project. The following meetings were held during this period (March 2017 to November 2017).

Table 13.2 List of EPP ETG engagement and meetings undertaken during Phase II consultation

Date	Contact Type	Organisation	Topic
6 th March 2017	Meeting	North Norfolk District Council	Site selection (minutes provided in Appendix 9.26).
14 th March 2017	Email	From Natural England	Provision of comments on the Offshore Ornithology Method Statement.
22 nd March 2017	Email	From Norfolk County Council	Agreement of phase 2 ecological survey methodologies.
7 th March 2017	Traffic and Transport Method Statement Response	From Highways England	Raised a potential impact on the A47 at the substation site near to Necton, requiring detailed analysis of traffic generation and a review of historic collisions.
8 th March 2017	Email	From Natural England	Advice on Cromer Shoal MCZ.
14 th March 2017	Email	From Natural England	Natural England feedback on Offshore Ornithology Method Statement.
17 th March 2017	Email	From Norfolk Wildlife Trust	Potential County Wildlife Sites along proposed onshore cable route.
21 st March 2017	Email	From RSPB	RSPB feedback on Offshore Ornithology Method Statement and provision of information.
21 st March 2017	Email	From Historic England	Historic England feedback on the geophysical and geotechnical survey methodology.
24 th March 2017	Email	From Environment Agency	Advice on white clawed crayfish.
29 th March 2017	Email	To Broadland District Council, Breckland Council and North Norfolk District Council	Provision of the proposed locations for the onshore noise and vibration monitoring survey (provided in Appendix 9.9).
31 st March 2017	Email	From Broadland District Council	Approval of onshore noise and vibration monitoring survey locations.
3 rd April 2017	Email	From MMO and Cefas	Advice on sediment sampling strategy.
5 th April 2017	Email	From The Planning Inspectorate	Provision of transboundary notification responses (from Germany, Norway, Denmark, Netherlands, Belgium, France).
12 th April 2017	Email	From Environment Agency	Key points that the Environment Agency would expect to see in a method statement for trench excavations in an SPZ.

Date	Contact Type	Organisation	Topic
20 th April 2017	Water Quality, WFD, Flood Risk Expert Topic Group Meeting	Internal Drainage Board	Project update and approach (provided in Appendix 9.20).
25 th April 2017	Email	From Norfolk County Council	Receipt of existing Minerals and Waste sites and allocations surrounding the cable corridor.
25 th April 2017	Email	To Breckland Council, North Norfolk District Council, Norfolk County Council, Historic England	Circulation of viewpoint locations for the LVIA and Cultural Heritage Assessment.
2 nd May 2017	Meeting	Natural History Museum, British Museum Queen, Mary University of London, North Norfolk District Council, and Norfolk County Council.	Discussion of coastal, intertidal and nearshore archaeological considerations at Happisburgh South (minutes provided in Appendix 9.23).
8 th May 2017	Email	From Natural England	Natural England advice on population modelling methods for assessing impacts of the Vanguard OWF.
8 th May 2017	Email	from Norfolk County Council	Agreement with suggested landscape viewpoints.
10 th May 2017	Email	from North Norfolk District Council	Agreement with suggested landscape viewpoints and additional viewpoint requested.
26 th May 2017	Water Quality, WFD, Flood Risk Expert Topic Group Meeting	Environment Agency	Project update and approach.
26 th May 2017	Email	to Historic England	Response to comments from Historic England on the approach to the Geophysical Survey (minutes provided in Appendix 9.20).
21 st June 2017	Email	From Historic England	Comments on the Onshore Site Investigation Methodology.
22 nd June 2017	Email	Environment Agency, MMO, Natural England The Wildlife Trust North Norfolk District Council, Cefas and WDC	Offshore HRA Screening (Appendix 5.1 of the HRA (document 5.3)) provided for consultation.
22 nd June 2017	Email	To Historic England	Provision of the Offshore Archaeology Technical Report (Appendix 17.1 of the ES).
22 nd June 2017	Email	To Environment Agency, MMO, Natural England North Norfolk District Council	Provision of documents (drafts of Chapter 8 of the PEIR and Appendix 10.1 of the ES (document 6.2)) to inform discussions at the Norfolk Vanguard Benthic Ecology and

Date	Contact Type	Organisation	Topic
			Marine Physical Processes Expert Topic Group meeting.
22 nd June 2017	Email	To Natural England WDC, Natural England, MMO	Provision of HRA Method Statement (Appendix 9.13) to inform discussions at the Marine Mammals Topic Group meeting.
26 th June 2017	Email	RSPB and EIFCA	Offshore HRA Screening (Appendix 5.1 of the Information to support HRA report) provided for information.
30 th June 2017	Email	Historic England, Norfolk County Council	Provision of WSI for monitoring of ground works (Appendix 9.12).
5 th July 2017	Benthic and Intertidal Ecology and Marine Physical Processes PEI ETG Meeting	Natural England, MMO, Environment Agency, Cefas and North Norfolk District Council.	Discussion of benthic HRA Screening. (Offshore ornithology HRA feedback also provided by Natural England) (minutes provided in Appendix 9.16).
6 th July 2017	Written feedback	Cefas	Response to an early draft of the Marine Physical Processes PEIR chapter.
6 th July 2017	Marine Mammals pre-PEI ETG Meeting	Natural England The Wildlife Trust, WDC and Cefas	Marine mammal HRA Screening agreed and approach to HRA discussed (minutes provided in Appendix 9.24).
6 th July 2017	Offshore Archaeology pre-PEI ETG Meeting	Historic England	Project update and overview of results to date (minutes provided in Appendix 9.23).
6 th July 2017	Email	From MMO/Cefas	Cefas comments on draft Marine Physical Processes PEIR chapter.
6 th July 2017	Email	From MMO/Cefas	Cefas comments on benthic survey report (Fugro, 2017).
14 th July 2017	Email	From Environment Agency	Provision of the Southern North Sea Sediment Transport Study.
17 th July 2017	Onshore Traffic and Transport pre-PEI ETG Meeting	Norfolk County Council and Highways England	Project update and overview of results to date (minutes provided in Appendix 9.21).
18 th July 2017	Onshore Ecology and Ornithology pre-PEI ETG Meeting	Natural England Norfolk Wildlife Trust and Norfolk County Council	Project update and overview of results to date (minutes provided in Appendix 9.19).
19 th July 2017	Landscape and Visual Impacts pre-PEI ETG Meeting	Norfolk County Council, Broadland District Council, North Norfolk District Council and Breckland Council	Project update and overview of results to date (minutes provided in Appendix 9.18).

Date	Contact Type	Organisation	Topic
19 th July 2017	Onshore Archaeology and Cultural Heritage pre-PEI ETG Meeting	Historic England, Norfolk County Council, Broadland District Council and North Norfolk District Council	Project update and overview of results to date (minutes provided in Appendix 9.22)
20 th July 2017	Onshore Noise pre-PEI ETG Meeting	North Norfolk District Council and Breckland Council.	Project update and overview of results to date (minutes provided in Appendix 9.25).
24 th July 2017	Email	From Historic England	Historic England comments on the Offshore Archaeology Technical Report.
11 th August 2017	Email	To Breckland District Council and Norfolk County Council	Provision of maps to facilitate the council's site visit on Tuesday 15 August 2017.
15 th August 2017	Email	To North Norfolk District Council	Provision of a list of tree species for the Ridlington area (provided in Appendix 9.3).
7 th September 2017	Email	To Natural England and RSPB	Provision of draft offshore ornithology PEIR Chapter 13.
8 th September 2017	Onshore Water Resources, Flood Risk, Ground Conditions and Contamination pre-PEI ETG Meeting	Environment Agency, Internal Drainage Board, NC and Anglian Water	Project update and overview of results to date (minutes provided in Appendix 9.20).
14 th September 2017	Meeting	Breckland Council	Follow-up from July ETG meeting, to discuss potential noise condition at the onshore project substation for Norfolk Vanguard and to agree that BS4142 is the most appropriate approach for the substation.
20 th September 2017	Email	From Norfolk County Council	Confirmation of review of WSI for the geophysical survey, with some additional comments.
06 th October 2017	Offshore Ornithology PEI ETG Meeting	Natural England and RSPB	Discussion of comments on the draft PEIR chapter (minutes provided in Appendix 9.20).
09 th October 2017	Email	From MMO	Cefas comments on the benthic survey methodology.
10 th October 2017	Email	To Historic England	Update on geo-archaeological assessment following acquisition of geophysical and geotechnical data.
25 th October 2017	Email	To Natural England WDC, The Wildlife Trust and Cefas	Provision of the Marine Mammals PEIR Chapter.

Date	Contact Type	Organisation	Topic
27 th October 2017	Email	From Anglian Water	Provision of a schedule of Anglian Waters assets potential affected by the proposed development.

13.5.1.2. Phase II consultation on EIA outside the EPP with stakeholders and consultees

282. Further meetings were held during this period (March 2017 to November 2017) with technical stakeholders and consultees. These meetings are set out below, and further information on earlier meetings is contained in Chapter 9.

Table 13.3 Phase II consultation with the Eastern IFCA

Date	Contact Type	Organisation	Topic
21 st October 2016	Meeting	Eastern IFCA	Introduction to Norfolk Vanguard and Evidence Plan Process.
29 th November 2016	Email	From Eastern IFCA	Data provision and request.

Table 13.4 Phase II consultation with Wildlife Trust

Date	Contact Type	Organisation	Topic
17 th March 2017	Email	From NWT	Potential County Wildlife Sites along proposed onshore cable route.

Table 13.5 Phase II consultation with oil and gas bodies

Date	Contact Type	Organisation	Topic
1 st March 2017	Email	To Shell	Request for information on pipelines coming into Bacton and decommissioning timescales.
7 th March 2017	Email	From Shell	Information on Leman to Bacton pipeline.
22 nd March 2017	Site visit	Shell	Reviewed potential locations for landfall and CRS site within Bacton gas terminal.
24 th March 2017	Email	To Shell	Request for further information in relation to shut down procedures, sandscaping scheme, underground pipework.
20 th April 2017	Email	To Shell	Request for further information follow-up.

Table 13.6 Phase II consultation with fishermen and fishermen's organisations

Date	Contact Type	Organisation	Topic
14 th March 2017	Meeting	CRPMEM	Discussion of available French VMS and also activities in relation to Vanguard.

Date	Contact Type	Organisation	Topic
31 st March 2017	Meeting*	John Knights	Identified main fishing ground in the array area and seasonality of this.
5 th April 2017	Meeting	NFFO	Activities of Anglo- Dutch vessels in relation to Vanguard.

*Correspondence with Brown and May Marine¹⁶

Table 13.7 Phase II consultation with shipping and navigation organisations

Date	Contact Type	Organisation	Topic
15 th March 2017	Email*	Hazard workshop invitation sent to: <ul style="list-style-type: none"> • Cruising Association (CA) • RYA • BMAPA • DfT • Chamber of Shipping (CoS) • Trinity House • MCA • RNLI • Rotterdam Harbour Master • Royal Association of Dutch Ship Owners • VisNed • NFFO • Brown and May • DFDS Seaways • Vroon • Boston Putford • P&O Ferries • Lowestoft Port • Peel Port Yarmouth Harbour Master 	Email invite to attend the Hazard Workshop and input into the Navigation Risk Assessment (NRA) and control. The invite letter is included in Appendix 13.5.
17 th March 2017	Meeting – London*	Maritime and Coastguard Agency and Trinity House	Overview and introduction to the project, alongside discussion on cumulative considerations and layout, Project Design and marine traffic. Minutes are included in Appendix 13.6.
27 th March 2017	Letter via email*	Regular operator letters issued to Commercial ferry operators identified	Regular Operator letter issued to introduce the project, and seek feedback on the proposed scheme.

¹⁶ Brown and May Marine (BMM) are a specialist UK fisheries consultant. BMM are undertaking engagement and consultation with relevant fishermen and fishermen’s organisations in relation to the project.

Date	Contact Type	Organisation	Topic
		from the Marine Traffic Survey <ul style="list-style-type: none"> • P&O • DFDS Seaways 	The letter is included in Appendix 13.7.
27 th March 2017	Letter via email*	Regular operator letters issued to oil and gas operators identified from the Marine Traffic Survey <ul style="list-style-type: none"> • Boston Putford • Ostenjo Rederi AS • Vroon Offshore 	Regular Operator letter issued to introduce the project, and seek feedback on the proposed scheme. The letter is included in Appendix 13.7.
27 th March 2017	Letter via email*	Regular operator letters issued to commercial operators identified from the Marine Traffic Survey <ul style="list-style-type: none"> • Brostrom AB • BP Shipping • Eimskip Ehf • Navigator Gas LLC • Norient Product Pool ApS • North Sea Tankers • Scotline Ltd • Stenersen Chartering AS • Stolt Tankers • Teekay Shipping 	Regular Operator letter issued to introduce the project, and seek feedback on the proposed scheme. The letter is included in Appendix 13.7.
11 th March and 28 th April 2017	Email*	Pieter Jonker – Rijkwaterstaat	Email offering meeting to discuss concerns regarding the effects of Norfolk Vanguard on shipping, marine mammal and nature conservation designations. The Email is included in Appendix 13.8.
7 th April 2017	Email*	BP Shipping	Initial feedback on regular operator letter and request to attend hazard workshop. Individual consultation meeting scheduled. The Email is included in Appendix 13.9.
8 th May 2017	Meeting*	Cruising Association, Royal Yachting and Association and Chamber of Shipping	Update provided on the progress of the project. Minutes are included in Appendix 13.10.
15 th May 2017	Meeting*	BP Shipping	Update provided on the progress of the project, including discussion on issues such as transboundary consultation, routeing options,

Date	Contact Type	Organisation	Topic
			cumulative impacts and decommissioning. Minutes are included in Appendix 13.11.
2 nd August 2017	Meeting*	BP Shipping	Update provided on the progress of the project, including discussion on issues such as the planning process, Hazard Workshop and potential mitigation measures. Minutes are included in Appendix 13.12.

*Correspondence with Anatec¹⁷

Table 13.8 Phase II consultation with aviation and radar organisations

Date	Contact Type	Organisation	Topic
6 th April 2017	Email*	From Osprey to the MOD (DIO)	Update to DIO on intention to submit revised layout for comment once revised layout is completed.
18 th May 2017	Email and attachment*	CHC Helicopters	Introduction by email with attachment providing details of the proposed project and an invitation for comment on any safeguarding concerns. A copy of this letter is included in Appendix 13.13.
1 st June 2017	Email and attachment*	Babcock International Helicopters (formally Bond Helicopters)	Introduction by email with attachment providing details of the proposed project and an invitation for comment on any safeguarding concerns. A copy of this letter is included in Appendix 13.14.
1 st June 2017	Email and attachment*	Bristow Helicopters	Introduction by email with attachment providing details of the proposed project and an invitation for comment on any safeguarding concerns. A copy of this letter is included in Appendix 13.15.
5 th June 2017	Email and attachment*	Luchtverkeersleiding (LVNL) Nederland (Dutch equivalent of NATS)	Introduction by email with attachment providing details of the proposed project and an invitation for comment on any safeguarding concerns. A copy of this letter is included in Appendix 13.16.

¹⁷ Anatec is undertaking engagement and consultation with relevant shipping and navigation organisations in relation to the project.

Date	Contact Type	Organisation	Topic
5 th June 2017	Email and attachment*	Inspectie Leefomgeving en Transport (ILT) (Dutch equivalent of UK CAA)	Introduction by email with attachment providing details of the proposed project and an invitation for comment on any safeguarding concerns. A copy of this letter is included in Appendix 13.17.
5 th June 2017	Telephone Enquiry and Email *	Public Information Service Netherlands	Introduction by email of the proposed development via an online enquiry form.
6 th June 2017	Email*	Public Information Service Netherlands	Request for email contact details of person responsible in Dutch Ministry of Defence.
7 th June 2017	Email*	MOD Netherlands	Introduction by email with attachment providing details of the proposed project and an invitation for comment on any safeguarding concerns. A copy of this letter is included in Appendix 13.18.
8 th June 2017	Email and attachment*	Maritime and Coastguard Agency	Introduction by email with attachment providing details of the proposed project and an invitation for comment on any safeguarding concerns.
7 th July 2017	Email and attachments*	MOD (DIO)	Provision of Norfolk Vanguard and Norfolk Boreas layouts, coordinates and associated drawings for review.
11 th July 2017	Email *	From: ATC The Netherlands (LVNL)	Response stating no comments.
18 th July 2017	Email *	LVNL	Request to LVNL that the opinion expressed on the 11 th July 2017 is also representative of the Netherlands Military.
19 th July 2017	Email *	From: ATC The Netherlands (LVNL)	Response to say that LVNL only comments on behalf of Air traffic control.
19 th July 2017	Email*	LVNL	Netherlands Military contact details were requested.
9 th August 2017	Email *	FROM: Netherlands MOD	Response to say project will most likely have no effect on the Air Force radars; it is beyond the range of mandatory radar check.
28 th September 2017	Telephone call*	MOD (DIO)	Request for update to when the developer might expect the results of the MOD analysis of the data supplied by email on 7 th July 2017.

Date	Contact Type	Organisation	Topic
6 th October 2017	Email*	MOD (DIO)	Follow-up email of the details of the telephone call on the 28 th September 2017, together with the forwarded email from 7 th July as an attachment.

*Correspondence with Osprey Consulting Services¹⁸

13.6. Phase II consultation with landowners

283. A refined cable route and refined locations of other onshore infrastructure were introduced to landowners in March 2017 in line with the second stage of non-statutory consultation (Phase II non-statutory consultation).
284. Ongoing consultations and meetings with affected landowners and land agents took place from March 2017. Comments and suggestions put forward have helped shape the final scheme and resulted in changes to the location of the project infrastructure and mitigation measures.
285. The Applicant’s land agents Consents Solutions have been available to meet with landowners as requested and have conducted multiple meetings, phone meetings and email discussions. Contact details for Consents Solutions have been publicised on all relevant literature and consultation materials throughout the process. Offers to meet potentially affected parties to discuss the project have been made on multiple occasions throughout the consultation.
286. All consultation materials were also made available to those who may have an interest in potentially affected land. Tailored information and engagement materials have also been produced for landowners during the consultation process.
287. A Landowner Information Pack was developed and provided to landowners in June 2017. It was also uploaded to the ‘Landowner’ Section of the project website as a publicly available document at the point of issue. The Landowner Information Pack (Version 1) can be seen in Appendix 13.19.
288. The following table summarises the activity undertaken during this period in conjunction with the Phase II consultation being undertaken as described in this chapter.
289. Numerous landowners attended the consultation events to review materials and speak with the project team.

¹⁸ Osprey Consulting Services is undertaking engagement and consultation with aviation and military organisations in relation to the project.

Table 13.9 – Summary of landowner consultation during Phase II non-statutory consultation

Date	Contact Type	Recipients	Topic	Appendix
6 th March 2017	Letter	All interested parties	Land referencing request for information (RFI) forms were issued to all landowners identified through Land Registry with a registered interest in the potentially affected land. The accompanying letter explained the project further, asked landowners for feedback on survey access requests, sought land referencing information and also provided contact details for the Applicant's local land agents Consents Solutions offering a meeting if one was desired. Large scale plans were issued to accompany the land referencing letters showing the entirety of the potentially affected land to allow landowners to identify how they may be affected and the potential impacts on their farming operations.	13.20
24 th March 2017	Letter	Interested parties not responded	Further land referencing letters were issued to those interests who had not responded to the initial letter. These letters again reiterated the offer of meetings to potentially affected landowners where they had not to date been accepted.	13.21
28 th March 2017	Letter	All interested parties	A letter was issued from Consents Solutions directly to all identified land interests offering a meeting and requesting landowners to get make contact to arrange a suitable time and date at their property to discuss the project and any questions they may have.	13.22
15 th May 2017	Letter	Interested parties not responded	Follow-up letter to those who had not made contact to arrange a meeting.	13.23
16 th June 2017	Letter	All interested parties	A project update newsletter was issued to all identified land interests updating parties on the refined route corridor and the decision to proceed to a south Happisburgh landfall location. The newsletter also introduced the reduced substation search zone to the north of Necton and the reduced cable relay station options. This letter was accompanied by the Landowner Information Pack (see Appendix 13.19). This pack was designed to provide landowners with up to date answers to frequently asked questions that Consents Solutions had received from multiple meetings. The questions and answers covered construction, engineering, environmental and commercial points and this document was also made available to download on the project website. The Landowner Information Pack	13.24 (letter), 14.1 (newsletter), 13.19 (Landowner Information Pack)

Date	Contact Type	Recipients	Topic	Appendix
			contained Vattenfall’s current position on topics such as construction methodologies, construction timelines and other frequently asked project questions. This allowed landowners to obtain more information on the proposed cable route, how it could be constructed and how it could affect their land.	
13 th July 2017	Letter	All interested parties	All interested parties were issued with a further letter along with an updated set of large scale route plans that showed the refined route corridor. Landowners were invited to make comments on the proposals. These plans put forward a proposed 100m indicative cable corridor alignment within the 200m search area with the letter asking for feedback on the indicative 100m corridor. The plans also proposed a number of accesses along the length of the project that would allow the Applicant access to the cable route during the operation and maintenance phase of the project and causing minimal impact on the neighbouring farm land. The letter invited landowners to arrange further meetings with Consents Solutions to discuss the location of these accesses, feedback their preferences and suggestions and to find out more information on the project. Where possible these accesses were aligned with existing field entrances and farm access tracks.	13.25

- 290. As a result of this engagement, by the end of May 2017, Consents Solutions had met with over 80 land interests, which gave the Applicant confidence that the appropriate progress was being made in contacting potentially affected land interests at that point.
- 291. A number of landowners (both on the route of the underground cable corridor and near to it) requested meetings and made comments at the exhibitions, including both general and specific comments in relation to land and farming impacts, as well as providing feedback on the project as a whole.
- 292. In addition, landowners and their representatives made a number of routing suggestions. These route amendment suggestions were reviewed by the project design team including engineering and environmental experts against the various constraints. Where possible the changes were incorporated into the project design. The Applicant has made efforts to route the cables to avoid constraints and reduce impacts.

293. Throughout the informal consultation process key local members of the National Farmers Union (NFU), Country Land and Business Association Limited (CLA) and two local groups of the Central Association of Agricultural Valuers (CAAV) were provided with regular updates regarding the project from Consents Solutions.

Table 13.10 Consultation with landowner organisations during Phase II non-statutory consultation

Date	Contact Type	Recipients	Topic
8 th March 2017	Email	NFU/CLA/CAAV	Project update re RFI letters, copy letter & newsletter.
27 th March 2017	Meeting	NFU	Attend NFU meeting at Barnham Broom to advise on project.
24 th April 2017	Email	NFU/CLA/CAAV	Update on project, PIDs, landowner meetings and surveys.
15 th June 2017	Email	NFU/CLA/CAAV	Update on consultations with landowners, forthcoming newsletter and link to project website.
28 th September 2017	Email	NFU/CLA/CAAV	Letter regarding geophysics surveys.

13.7. Feedback and key issues raised in Phase II

294. Following the conclusion of Phase II of the non-statutory consultation the Applicant compiled a summary report of the feedback received during the consultation. The Summary Report provides a snapshot of the range of views and comments that were gathered both at the events and from 268 completed feedback forms. This report was subsequently uploaded on the project website.
295. With 884 participants and 268 feedback forms completed, the level of response achieved during Stage Two of the non-statutory consultation was approximately 30%. This represents a significant increase on the levels of feedback received during Phase I of the non-statutory consultation which was approximately 8%.
296. The key themes identified in the feedback provided during Phase II of the non-statutory consultation period include:

Landfall

Regarding the landfall location, many residents were concerned that, should landfall be at Bacton or Walcott, there would be an unacceptable impact on the local population.

The majority of the comments received expressing a preference for any of the possible landfall zones stated that a location near Happisburgh would be the most appropriate location for landfall. Some of the comments received during Phase II of the non-statutory consultations on this issue suggested that as there are fewer people in the Happisburgh area, compared to Bacton and Walcott, this would have lower social impacts.

Some responses received considered the southern landfall zone more appropriate as it would mean that offshore cables could avoid traversing the Marine Conservation Zone (MCZ). A great number of participants felt that any landfall location should consider opportunities to defend the coastline, given the issues of coastal erosion affecting much of the North Norfolk coastline. Respondents also sought to highlight that the idea of rocks forming a lagoon to protect this area was a good idea and would ease the flooding issue particularly in Walcott/Bacton.

Other general issues raised on the topic of landfall included calls for assessing and protecting the archaeology at Happisburgh, the conclusion that Happisburgh was the most sensible area to locate landfall, especially as it was outside of the Marine Conservation Zone and is away from the Priory and Bacton Woods.

CRS

On the issue of the CRS, respondents during Phase II of the non-statutory consultation continued to highlight concerns about the potential visual impact of CRS should they be required.

More specifically, respondents clearly rejected the proposed CRS location 'Site 4' due to its proximity to the Bromholm Priory (also known locally as Bacton Abbey) and its position as a National Heritage site.

A key theme of the responses received on this issue was the expectation that if the landfall of cables from the project was located in the northern area of the landfall search zones being considered, then any CRS should be placed as close as possible to the existing gas terminal infrastructure, in order to avoid the spread of industrial infrastructure across the area.

A significant number of respondents also expressed their preference for utilising HVDC technology over the use of HVAC technology.

Cable Corridor

Many of the responses received in relation to the underground cable corridor route were focused on the construction and management of the project. These responses stemmed from the recognition among local residents that the impacts

associated with the construction of the underground cable corridor were, in the main, temporary.

Responses from landowners and land users were particularly focussed on the trenching and cable installation process, and in discussing where trenchless installation could be considered and deployed.

Another key theme received on this issue was concern about the potential impacts that the construction of the underground cable corridor could have on traffic in the area, with many respondents choosing to highlight that a significant number of local roads are narrow and therefore unsuitable for heavy goods vehicles.

In conclusion, the onshore cable corridor construction process was further refined as a result of feedback during Phase II, with a sectionalised approach developed in order to minimise impacts and the use of a haul road along the cable corridor to facilitate the workfront approach while reducing traffic on local highways and byways.

Onshore project substation

This topic generated the most feedback at the Necton drop-in held on Friday 24th March. Participants were asked to comment on the revised Substation search area which showed an area to the North and East of Necton. A majority of the feedback received at the Necton drop-in event expressed opposition to locating the Substation at Necton. However, feedback was also received which addressed specific issues within the substation search area, focussing on the issue of visual impact of the Substation and the noise which it would generate.

Linked to this, the feedback of some respondents suggested that in order to reduce the potential visual impact of the proposals, that the onshore project substation should be placed close to the existing Dudgeon substation, whilst others expressed a preference for locating the substation to the east of the village where it would be screened by existing woodland, and/or further away from the properties of the village.

Opportunities and benefits

Many responses received during Phase II of the non-statutory consultation identified potential benefits that could be associated with the project in addition to the key environmental benefits of reducing the UK's carbon emissions. A key theme of the responses received regarding this issue was the project's potential for significant levels of job creation and support for the local economy.

In particular, many responses sought to emphasise the need to train young people in the area in order to provide them with the skills necessary to oversee the management, maintenance and construction of wind farms.

Another key theme identified within responses on this issue was the project's potential to help improve the current infrastructure in the region, in particular the possibility of utilising the construction on the onshore cable route to improve regional connectivity through the installation of fibre optic cables for high speed internet.

297. A transcript of all feedback form responses, and notes made by participants at the drop-in exhibitions was recorded in a full report of the drop-in events, called 'Hearing Your Views II'.

The contributions of local people, landowners and stakeholders were considered in detail by the project team and helped inform the identification of a refined search area for environmental surveying to further investigate the proposed landfall location, the cable relay station search options, underground cable route and onshore project substation positioning to connect into the National Grid at the existing 400kV National Grid substation near Necton.

14. PHASE IIB – ADDITIONAL NON-STATUTORY CONSULTATION - WORKSHOPS

14.1. Introduction

298. Following the second phase of informal consultation, the project’s cable corridor was relatively well defined, however, there were still options being considered in terms of suitable siting of significant permanent onshore infrastructure, notably CRS if required with an HVAC transmission system, and the project substation. At this stage the team were also evaluating siting options for both the Norfolk Vanguard and Norfolk Boreas CRS and project’s substations – as the Applicant has made a commitment to co-locate infrastructure where possible.
299. Following the second phase of non-statutory consultation in March and April 2017, the Applicant produced a newsletter, which was distributed to local communities in order to provide an update on the project and some insight into the feedback received during the second phase of non-statutory consultation. This newsletter can be seen in Appendix 14.1.
300. The Applicant decided to undertake two workshops focused on the following key geographic locations and significant onshore infrastructure:
- **Cable Relay Station Workshop** – 18th July 2017 between 6.30pm and 9pm at the Wenn Evans Centre, Blacksmiths Lane, Happisburgh, Norwich, NR12 0QY.
 - **Necton Substation Workshop** – 19th July 2017 between 6.20pm and 9pm at the Green Britain Centre, Turbine Way, Swaffham, PE37 7HT.
301. These workshops were put on in response to feedback received during the non-statutory consultation periods, particularly with reference to the Environmental Impact Assessment (EIA) process and how/whether it can ensure the best possible environmental solutions for Norfolk Vanguard. The events aimed to provide detailed information on the EIA process, specifically with regard to siting cable relay stations and the onshore project substation. Options provided within the refined proposed siting zones for the substation and cable relay stations were presented and discussed in order to identify key issues and opportunities associated with each option.
302. The workshops were then followed by a public drop-in event on the following day at each location. This allowed local residents to see the latest information about the proposals and allow further feedback and discussion with the project team.

303. The public drop-in events were:
- **Cable Relay Stations Drop-in event** – 19th July 2017 between 10am and 4pm at The Church Rooms, St Mary the Virgin Church, Church St, Happisburgh, Norwich, NR12 0PL.
 - **Project Substations Drop-in event** – 20th July 2017 between 10 am and 4pm at the Green Britain Centre, Turbine Way, Swaffham, PE37 7HT.
304. The meetings described some of the constraints and opportunities that would influence siting decisions and invited participants to contribute their views on the opportunities and constraints they identified. This allowed for further consideration of local feedback as the proposals were being developed prior to the statutory consultation period in November and December 2017.

14.2. Cable Relay Station Workshop and drop-in event overview

305. Invitations to the Cable Relay Station Workshop were issued on the 4th July 2017, two weeks prior to the event taking place. A copy of the invitation letter can be found in Appendix 14.2. Specific requests from individuals to attend the workshop were also accommodated where possible and in compliance with the venue capacity and protocols.
306. Invitations were sent to:
- Resident neighbours and those living in close proximity to the proposed siting options;
 - Affected landowners or tenants;
 - Relevant local community representatives (including community action/interest groups with an interest in the proposals); and
 - Relevant parish and local authority representatives.
307. The invitee list (excluding resident addresses) is included in Appendix 14.3. The Applicant liaised with community groups prior to issuing invitations to ensure that relevant interested parties were invited to participate.
308. The Cable Relay Station Workshop was facilitated by Rachel Leggett Associates, a local, independent facilitation company. Participants were seated at the event at tables of six to ten people. At each table there was either an independent facilitator from Rachel Leggett Associates and/or a member of the project team to help manage discussions and encourage participation.

309. Order of the evening:
- Presentation: Where the project has got to and a recap of the Environmental Impact Assessment (EIA) process
 - Group reflections and discussion
 - Presentation: Three possible footprints
 - Group discussion – pros, cons and ways to reduce impact of each footprint option
 - Presentation: What happens next?
310. A copy of the presentations produced for this workshop can be found in Appendix 14.4. These presentations included computer generated visualisations and photomontages of the proposals to assist in providing clear understanding for attendees. Information shown at the workshop was also made available on the project website www.vattenfall.co.uk/norfolkvanguard. A 3D computer generated model was also available to view at the workshop. A specialist operator was on hand to assist with any queries.
311. At the drop-in events, attendees were able to view the photomontages and the 3D model illustrating the cable relay stations at the different siting options presented. Project team staff were on hand to answer questions and listen to views of participants.
312. The workshop was attended by 55 participants, and 60 people signed in at the drop-in event the following day.
313. The key themes that arose from this workshop related to the detail of the siting of the relay stations, and why the Applicant was considering both HVAC and HVDC transmission systems. In addition, the following key themes were discussed, and feedback was provided:
- Local habitats and species;
 - Local ground conditions and hydrology issues;
 - Access and impacts to local amenities;
 - Concerns about visual and landscape impacts;
 - Noise and vibration; and
 - Ideas on how to address or reduce potential local impacts.

314. Feedback received from attendees at the workshop, and the public drop-in event was compiled into a report, which was published following the events and made available on the project website www.vattenfall.co.uk/norfolkvanguard. The report can be reviewed in Appendix 14.5.

14.3. Necton Substation Workshop overview

315. Invitations to the Necton Substation workshop were issued on the 4th July 2017, two weeks prior to the event taking place. A copy of the invitation letter can be found in Appendix 14.6. Specific requests from individuals to attend the workshop were also accommodated where possible and in compliance with the venue capacity and protocols.

316. Invitations were sent to:

- Resident neighbours and those living in close proximity to the proposed siting options;
- affected landowners or tenants;
- relevant local community representatives (including community action/interest groups with an interest in the proposals); and
- relevant parish and local authority representatives.

317. The invitee list (excluding resident addresses) is included in Appendix 14.7.

318. The Necton Substation workshop was facilitated by Rachel Leggett Associates, a local, independent facilitation company. Participants were seated at the event at tables of six to ten people. At each table there was either an independent facilitator from Rachel Leggett Associates and/or a member of the project team to help manage discussions and encourage participation.

319. The order of the evening differed slightly from the Happisburgh workshop. The independent facilitator adapted the agenda to allow more time for enhanced small group discussions with members of the Norfolk Vanguard project team members, so more participants' questions could be answered. This involved having the presentations at the beginning, with plenary afterwards.

320. A copy of the presentations produced for this workshop can be found in Appendix 14.8. These representations included photomontages and visualisations of each of the four potential substation footprints in order to provide clear understanding for attendees. All information shown at the workshop was also made available on the project website www.vattenfall.co.uk/norfolkvanguard. A 3D computer generated

model was also available to view at the workshop. A specialist operator was on hand to assist with any queries.

321. At the drop-in events, attendees were able to view the photomontages and viewpoints of the potential substation footprints. Project staff were on hand to answer questions and listen to views of participants. 3D computer generated visualisations were also available to view interactively with a specialist operator on hand to assist.
322. The workshop was attended by 42 participants, and 23 people attended the drop-in event the following day. Since the events there have also been numerous follow-up e-mails providing further thoughts, views and questions.
323. The key themes that arose from this workshop related to the detail of the siting of the Necton Substation, and the impact that this would have on the village. In addition, the following key themes were discussed, and feedback was provided on:
- The impact on local habitats, species, flora and fauna.
 - Socio-economic impact and impacts to local amenities.
 - Concerns about visual and landscape impacts. Some participants provided suggestions about how to reduce visual impacts, for example burying the onshore project substation, planting trees on raised soil mounds around the infrastructure, and other comments in relation to mitigation planting.
 - Issues regarding drainage in the local area.
 - Concerns regarding potential noise pollution.
 - Impacts on local traffic volume as well as cumulative impact on highway network.
 - Alternative sites. An open field to the east-south-east of Necton, near Scarning, was suggested as an alternative onshore project substation location.¹⁹
324. Feedback received from attendees at the workshop, and the public drop-in event was compiled into a report, which was published following the events and made available on the project website www.vattenfall.co.uk/norfolkvanguard. The report can be reviewed in Appendix 14.9.

¹⁹ During informal consultation, suggestions for alternative onshore project substation locations were brought forward by consultees notably, at Top Farm and at Scarning. The Applicant has considered appropriate alternative sites in selecting the onshore project substation location, and the process undertaken is set out in Chapter 4 of the Environmental Statement.

14.4. Feedback and key issues raised

325. Feedback was received from local residents, community groups and representatives in relation to the proposed substation and cable relay station siting.
326. A core theme that arose in feedback, particularly at the Cable Relay Station Workshop and drop-in, related to Vattenfall's consideration of maintaining either an HVDC or an HVAC transmission system. Consultees noted considerable differences in impacts relating to these options and expressed a preference for an HVDC transmission system.
327. Feedback from the onshore project substation workshop and drop-in related to concerns about impacts resulting from locating the project infrastructure close to Necton. A number of suggestions were received about how to mitigate these impacts. Views, concerns and ideas were all fed into the site selection process.
328. Further information can be found in Chapter 17, which summarises the key issues that arose during this consultation exercise, alongside how this feedback influenced changes and refinements in the proposals.
329. A full feedback report from each workshop is included in Appendix 14.5 and 14.9. These reports contain feedback provided at the workshops or the drop-in events. In addition, further feedback was received in the days and weeks following these events. All feedback received was taken into account by the project team as the proposals were refined ahead of the statutory consultation.
330. An update letter was produced and issued to all stakeholders (those that were involved in the workshops and drop-in sessions, as well as those that were not) and issued on 11th August 2017. This letter contained review of the activity undertaken, links to access the materials presented during the events, as well a link to view a copy of the reports for each of the workshops. The mailing list for this included all those on the invitation list to both workshops (see Appendices 14.3 and 14.7 for non-resident invitees).

15. ONGOING COMMUNICATIONS AND FEEDBACK

331. Following the non-statutory phases of consultation, ongoing engagement was undertaken with key stakeholders, community groups and residents.
332. Meetings were also held with the following stakeholders in advance of the statutory consultation period:

Table 15.1 Meetings held with key stakeholders prior to statutory consultation

Date	Contact Type	Organisation	Topic
7 th July 2017	Meeting	Necton Parish Council (Clerk)	LLO meeting with Parish Clerk – encouraging local participation.
8 th July 2017	Meeting	Dereham Town Council	Project update presentation.
11 th July 2017	Meeting	Norman Lamb MP	Project update & reflection on constituents’ interests / needs: coastal issues and CRS.
12 th July 2017	Festival attendance	Reepham Festival	Attendance and support of festival.
19 th July 2017	Meeting	Local Planning Authorities: Norfolk County Council / North Norfolk District Council / Breckland District Council / Broadland District Council / Great Yarmouth Borough Council	Project update and informal discussion on the SoCC ²⁰ .
24 th August 2017	Public meeting - Q&A session	Convened & chaired by Norman Lamb, MP Witton & Riddlington Parish Council, Happisburgh Parish Council, East Ruston Parish Council	Responding to local community questions about Norfolk Vanguard, particularly, transmission system choice, cable corridor, cable relay stations.
8 th September 2017	Meeting	George Freeman MP and Necton Parish Council	Project update and discussion on local opportunities.
13 th September 2017	Meeting	Reepham Town Council	Project update presentation.
16 th October 2017	Meeting	Reepham Rotary Club	Project update presentation.

²⁰ Further information regarding the SoCC development can be seen in Chapter 20.

Date	Contact Type	Organisation	Topic
18 th October 2017	Meeting	Aylsham Parish Council	Project update presentation.

333. These continued informal discussions assisted in keeping stakeholders updated and informed on the project development and upcoming approach to the statutory consultation phase. Discussions also assisted in informing the development of the SoCC, which is detailed in Section 20.3.
334. The project team also kept in touch with local residents throughout the periods between structured informal consultation detailed above. The provision of a community information line number (01603 567995) and email address (info@norfolkvanguard.co.uk) ensured that there was always a line of communication available directly with the project team. This was supplemented by further outreach and engagement undertaken with harder to reach or seldom heard groups, as well as a range of community organisations and education providers. Further information about this is detailed in Chapter 15.

16. LOCAL LIAISON AND HARDER TO REACH ENGAGEMENT

335. The Applicant recognises the importance of engaging with stakeholders, including communities, through its work.
336. The addition to the project team of a Local Liaison Officer (LLO), since January 2017, has facilitated significant outreach, raising awareness of the project, encouraging wider participation, and helping to build understanding of important social, economic and environmental factors, relevant to project development.
337. Building local relationships in Norfolk has helped in publicising opportunities for local people to learn about the project and help shape it, through linking face-to-face with local parish and town councils, developing a network of people who are aware of the project (“word-of-mouth” is often cited as the means by which people have heard about consultation events). In addition, the Applicant (via the LLO) submitted information to parish councils and local education within and relevant to the project in a timely way, thus enabling further distribution of consultation materials via local magazines or publications. An example of this can be found in Appendix 16.1.
338. Early engagement events and online opportunities to interact with the project were not particularly successful at attracting the participation of young people, nor others whose voices are seldom heard in consultations. Yet, early opinion gathering, with respect to the potential and strategic value of deploying offshore wind in the southern North Sea suggested that there was general support for projects like Norfolk Vanguard, because they might help safeguard the future of coming generations by helping to reduce UK carbon emissions. They also represented skills, training and job opportunities for younger people in Norfolk. Further information about the outcomes of the early stages of informal consultation can be found in Chapter 17.
339. With the aim of involving a wider section of the local community whose lives might be affected by the development of the Norfolk Vanguard project, the Applicant has sought to make engagement events more open and accessible to a wider variety of people. A simple measure has been to conduct consultation events in venues that make it easier (and less intimidating) for young people and people whose lives do not centre around community halls and civic buildings, to participate, e.g. schools, colleges, shopping centres, market places (pop-up events).
340. In order to engage younger people, the Norfolk Vanguard team collaborated with technical experts to develop a one-day programme for students at local schools, colleges and training establishments whose catchments encompass the Primary Consultation Zone. The interactive 3D digital tool developed allows students to explore the challenges, constraints and opportunities associated with the

development of offshore wind farms following an EIA process, in a role-play type experience. The evaluation of this programme can be found here: <http://bit.ly/2HxO2b5>.

- 341. Links have been established with Youth Engagement, Children in Care, Young Carers and Youth Parliament representatives, to highlight opportunities for young people to take part in consultation and out-reach events.
- 342. Links have also been established with Department of Work and Pensions to appreciate their strategy for supporting ex-service people back into work (Armed Forces Covenant) and more vulnerable young people (carers and those not in education, employment or training (NEET)).

16.1. Raising awareness of the project

- 343. Examples of the types of meetings held by the team are included in the tables below. These meetings aimed to raise awareness of the project, gain an understanding of relevant local context, including wider strategic or local objectives which the project could support and gain an understanding of social, economic and environmental factors which might help influence project proposals.

Table 16.1 LLO and community engagement prior to statutory consultation

Date	Contact Type	Organisation	Topic
29 th June 2016	Meeting	Community Foundation Norfolk	Exploration how to reach local stakeholders.
21 st April 2017	Meeting	Step into Tech	Explore young tech programme and links to young people with aptitude in technological topics.
10 th May 2017	Meeting	Community Foundation Norfolk	Advice sought about linking with seldom heard / harder to reach groups particularly during statutory consultation.
10 th May 2017	Meeting	Norfolk County Council Community Engagement team	Advice sought about linking with seldom heard / harder to reach groups particularly during statutory consultation.
6 th to the 9 th July 2017	Stand / info-point	Dereham Blues Festival	Meeting local people and introducing the project, next steps.
12 th July 2017	Stand / info-point	Reepham Festival	Meeting local people and introducing the project, next steps.
16 th October 2017	Presentation	Reepham Rotary Club	Project update.
13 th December 2017	Presentation	Reepham Town Team	Project update.

344. The meetings recorded below relate to understanding strategic and local objectives, and understanding social, economic and environmental factors that could influence project design. These have included meetings with representatives of some key organisations that have an interest in the project and with whom a future partnership could emerge to enhance outcomes for local communities and businesses such as:

- University of East Anglia (UEA) links with Engineering Relationship Manager and Environment,
- Marine and Agriculture Relationship Manager;
- Hethel Engineering (CleanTech East Steering Group);
- North Norfolk MCZ (Agents for Change programme).

345. More recently, and in response to local interest, the Norfolk Vanguard team has begun to meet parties representing, interested in and currently part of, a local offshore wind Supply Chain in the Norfolk and New Anglia LEP region. The Applicant has participated, including presented at events convened by the East of England energy Group (EEGR) and the Norfolk Chamber of Commerce.

346. The following engagement has been undertaken with local community groups to raise awareness of the project and encourage local participation in the consultation:

Table 16.2 Engagement with community groups to raise awareness of the project

Date	Contact Type	Organisation	Topic
18 th January 2017	Joint meeting	University Technical College Norwich (UTCN)	Employer engagement.
31 st January 2017	Conference	Norfolk Coast Project AONB (Estelle Hook)	Project update and discussions.
16 th March 2017	Meeting	Norfolk Wildlife Trust	NWT Communities and Nature meeting.
16 th March 2017	Exploratory meeting	University of East Anglia (UEA)	Explore engineering apprenticeships.
28 th March 2017 (plus 5 th December 2017 and 29 th March 2018)	Forum meeting	North Norfolk Coastal Forum	Project update (presentation).
11 th May 2017	Meeting	North Norfolk District Council	Informal discussion – understanding local tourism; socio-economic context and effects of

Date	Contact Type	Organisation	Topic
			the North Norfolk Shoreline Management Plan, Deep History Coast opportunities.
18 th May 2017	Exploratory meeting	BB4ER	Hearing about the BB4ER initiative and the B4RN model.
15 th June 2017	Young person's event	East Coast College (Gt. Yarmouth)	Energy Skills Foundation Interview skills.
20 th June 2017	Young person's event	Reepham High School	Career, STEM programme workshops.
15 th September 2017	Meeting	Colby Primary School)	Explore, pilot and deliver a Primary Programme.
6 th October 2017	Meeting	Happisburgh School	Explore hire of school and education opportunities.
6 th October 2017	Reception	Community Foundation Norfolk	Launch of Vital Signs report: health and socio-economic study of Norfolk communities.
19 th October 2017	Launch event	Norwich Science Festival	Understanding the festival, and how it contributes to local promotion of STEM learning.
17 th November 2017	Exploratory meeting	Community Foundation Norfolk UEA	Linking "Stay Well this Winter" initiative (CFN) with UEA student & research programmes researching local fuel efficiency measures.
29 th November 2017	Young person's event	EEEEGR 'Energise your Future' event	Organising team.
6 th December 2017	Presentation	Chartered Institute of Engineers with UTCN	Presentation by student on the 3DW prog. To ICE.
15 th January 2018	Meeting	Breckland District Council	Meeting with the Council's Skills/business representative.
22 nd January 2018	Meeting	Broadland District Council	Meeting with the Council's Skills/business representative.
25 th January 2018	Meeting	North Norfolk District Council	Meeting with the Council's Skills/business representative.
31 st January 2018	Meeting	Great Yarmouth Borough Council	Meeting with the Council's Skills/business representative.
1 st February 2018	Meeting	NA LEP Energy Sector skills plan	Share thinking and develop input into plan.

Date	Contact Type	Organisation	Topic
1 st February 2018	Drop-in event	New Anglia Enterprise Advisers Network	Meet team and understand/explore input.

17.OVERVIEW OF NON-STATUTORY CONSULTATION AND INFLUENCE ON THE PROJECT

347. Extensive engagement and consultation took place during the period prior to the statutory consultation in November and December 2017. The preceding chapters have outlined the activity that has taken place since the project’s inception and public launch in 2016.
348. The Applicant received a large amount of feedback to the informal consultation processes that were undertaken. This feedback has helped the Applicant refine and develop the project by seeking views and encouraging comment from technical and local community consultees at key milestones.
349. As well as providing responses where possible to local concerns and ideas, as the understanding of the project team has developed through the process, and design assumptions have been revised, the Applicant team has sought to share its thinking and understanding with stakeholders, so that they can appreciate wider factors influencing proposals for Norfolk Vanguard, which may mean that local concerns are not matters that the Applicant can address.
350. Feedback received to the non-statutory consultation period covered a range of issues and topics, however there were a number of recurring key themes and issues of clear importance to the local communities through which this project is proposed to operate.
351. As a result of feedback received, a number of project refinements and decisions were made. These key issues are summarised below alongside a description of how they influenced the project.

17.1. Non-statutory consultation: Phase I Summary issues and influence on the project

352. The project outline presented for informal consultation at the start of Phase I (see Phase 1 consultation materials in Appendix 12.7) is summarised below.

Overview of the project proposals and why the southern North Sea is a suitable place to develop offshore wind: Key elements of an offshore wind farm were described, noting the requirement for a cable relay station if an HVAC transmission system were to be deployed to transmit energy from the project to the national grid.

Offshore: Details were provided in relation to factors considered by the EIA process, and a map showed some existing designations, operations and development proposals within and adjacent to the licensed project development

area, such as conservation and protected areas, the location of major shipping routes and aggregate extraction areas.

Onshore: Details were provided to describe factors considered by the EIA process and project design principles, more detail was provided in relation to specific themes on which feedback was sought.

Onshore cable corridor search zone: Mapping showed the scoping area being considered and asked for any local intelligence within this scoping area which could present opportunities or constraints that should influence project refinement.

Landfall search zone: A swathe of coastline extending from Bacton in the north to south of Happisburgh, in the south. Feedback was invited in relation to three zones; north central and south (referred to as L1, L2, L3 in consultation materials).

Cable relay station search zone: Corresponding to the landfall search zone above, appropriate locations for siting a CRS (if required) were considered in three zones, from the coast and extending 5 km inland, again, from north to south, these were referred to in consultation materials as R1, R2, R3) local feedback was invited in relation to any factors that should be considered in relation to siting project infrastructure.

Substation search zone: It was explained that for technical reasons, the project substation should be located as close as possible to the National Grid substation. A sector approach was adopted, with the intention of assisting participants focus their responses and possibly reflect any preferences should they have any for any sector over another. Five sectors were considered, with Sector 5 describing a core zone, radius of 1 km, around the existing 400kV National Grid substation near Necton, and four further zones contained within a wider, 3 km radius (Sectors 1 - 4).

353. The table below summarises the issues raised through consultation and explains how they have influenced the design of the project.

Table 17.1– Summary of issues and regard had by the Applicant to Phase I feedback

Summary Issue	Applicant response and influence on the project
<p>General attitudes towards the development of large scale renewable energy projects in the southern North Sea.</p> <p>The majority of those responding to the consultation expressed general support for the development of renewable energy generation, however, these attitudes were tempered by a need to develop projects sensitively, offshore and onshore</p>	<p>It was useful to hear early on from local people about the benefits they hope projects such as Norfolk Vanguard can bring to the local area and the region. Having this understanding of local interests can help shape the Applicant’s strategies through development and beyond to try to ensure these perceived benefits become a reality, and also to encourage broad local participation in the development process, so that the projects are developed sensitively and appropriately with as</p>

Summary Issue	Applicant response and influence on the project
	<p>much focus on meeting opportunities to provide benefits as on eliminating and reducing perceived and real negative impacts.</p>
<p>Understanding the Development Consent Order and Environmental Impact Assessment process and their role in developing appropriate project proposals. Participants expressed cautious confidence in the EIA process and the role of consultation in helping to shape the Norfolk Vanguard project proposals.</p>	<p>There were no specific concerns raised that the Applicant could directly respond to, however by seeking to address ideas, concerns and views provided in subsequent correspondence and consultation events, the Applicant has sought to build on local understanding of both the project and the process it must follow through development in order to gain consent to be built and to operate. From early consultation (Phase I informal consultation) the Applicant has sought to record and openly report on the feedback received and respond to it to show how local views help to shape the project, thereby giving people a greater appreciation of their contribution to the NSIP process. The Applicant has also listened when people have provided feedback on the consultation process itself, for example noting a preference for visual materials that allow people to imagine what the project might look like, what constraints and opportunities need to be considered through the EIA and project design process.</p> <p>The Applicant decided, following Phase I consultation, to develop an online interactive mapping tool, to help people look at the project proposals in front of their own computers, and to zoom in to focus on detail at a very local level, and zoom out as they pleased to look at the wider project and it's context, enabling a greater appreciation of the project as it developed and evolved. This tool has been updated to reflect revised project design at every stage.</p>
<p>Offshore works, marine and coastal issues. The questions on this issue did not prompt a significant number of comments about marine and coastal issues relative to the questions relating to onshore works. In part this is possibly because the project is located more than 47 km offshore, and for many this unfamiliar and unseen environment is not one that concerns them as much as areas closer to home. However, responses did express concerns about the possible impact on marine life and habitats as a result of installation of the offshore wind farm. Comments such as these were fairly typical, and included topics such as:</p> <ul style="list-style-type: none"> • Possible negative impacts on food supply for foraging sea birds; 	<p>During the early stages of project development, there is comparatively little project specific information to share to help communities appreciate the great effort invested to ensure that projects are developed sensitively – avoiding, reducing or mitigating potential detrimental effects. However, in response to feedback describing general environmental concerns, it was possible to show how the Applicant, as developer and operator of several offshore windfarms in the UK and elsewhere in Europe take environmental considerations very seriously. To this end, the February 2017 newsletter highlighted some of the ongoing environmental research (undertaken by or funded by Vattenfall).</p> <p>During the Phase I informal consultation, scoping opinions were also sought. Some community</p>

Summary Issue	Applicant response and influence on the project
<ul style="list-style-type: none"> • Impact of noise on marine mammals – during construction and operation; • Effect on newly designated Cromer chalk reef MCZ; • Impact on erosion sensitive coastal area; and • How will you liaise with fishing community? Fishing Businesses need advance warning of any works (incl. surveying). <p>Further comments about coastal issues appeared on several flipcharts relating to onshore works, and the landfall search area in particular.</p> <p>Many of these comments related to coastal protection, coastal tourism, and habitat and wildlife concerns. However, there were also some comments drawing attention to the “Happisburgh Footprints” and other archaeological interests.</p>	<p>consultees shared the concerns of statutory consultees in relation to potential impacts to the newly designated Marine Conservation Zone (MCZ), highlighting its importance as a natural asset, and the role of communities in influencing designation and management, and for these reasons suggested landfall should be located to the south of the MCZ. However, other consultees also highlighted the potential opportunity to locate project infrastructure, such as cable relay stations (if required) close to existing industrial infrastructure (such as near Bacton Gas terminal). The Applicant learnt that consultees throughout North Norfolk are acutely aware of dynamic coastal processes and the response of statutory bodies to these natural process, as described in the Shoreline Management Plan (AECOM, 2012; is discussed further in Chapter 8 of the ES (document 6.1). Some consultees highlighted their preference for northern landfall options because near Bacton and Walcott, there are sea defences in place. Gaining an understanding of local concerns helps us to prepare and present relevant information.</p> <p>The Norfolk Vanguard project team employed Brown & May Ltd to act as a liaison with local fishermen and commercial marine users. Project newsletters and other updates have been shared via Brown and May Ltd. with local stakeholders, and several members of the local fishing community participated in drop-in events and responded to consultations. More recently there have been additional concerns raised about how impacts and specifically any curtailment of local fishing activities may have a knock-on effect in relation to their supply chain, for example affecting local outlets who process and manufacture local catch. The Applicant continues to review these concerns, and to liaise with local interests in order that any potentially impacted businesses and interests can prepare appropriately and in a timely manner to any temporary impacts that may ensue as result of offshore and coastal construction.</p> <p>The Happisburgh footprints were a set of fossilized <u>hominid</u> footprints that date to the early <u>Pleistocene</u>. They were discovered in May 2013 in newly uncovered braided river sediments on <u>Happisburgh</u> beach and were destroyed by the tide shortly afterwards. Local interest is understandably keen given the significance of the findings. At this point the project had no significant new information to contribute to the wider understanding of this fascinating topic of early settlement of the British</p>

Summary Issue	Applicant response and influence on the project
	<p>Isles, however it was recognised that care should be taken in the event that site investigations be required here, to collect, record and share data with this interest in mind.</p> <p>For the March 2017 drop-in events (Phase II informal consultation – see Section 17.2 for further details), the Applicant also prepared an additional factsheet describing studies dedicated to understanding and eliminating / reducing potential impacts on marine mammals (as these were the species most highlighted by consultees). This is published on the website also.</p> <p>The Applicant continues to highlight through digital and social media channels and other means ongoing work and recent publications that may be of interest to local consultees and a wider stakeholder group. For example, the results of offshore wind bird impact studies, and the reduction of impacts to wildlife at EOWDC as a result of deployment of new foundation installation systems.</p>
<p>Finding the best landfall location. Responses on this issue suggested that the landfall siting should be as close as possible to Bacton; an advantage of this being that the cable relay station (which was still under consideration at this point) might be located close to existing infrastructure and not on open farmland. Other responses highlighted concerns about whether the strict security at Bacton might impact on project construction and / or whether the co-location of gas and electrical energy projects of national significance might, in the long run, represent a heightened risk.</p> <p>Some responses on this issue suggested landfall should be located near Happisburgh, however others sought to emphasise existing issues with coastal erosion in this area and concerns that siting landfall here would exacerbate this issue.</p>	<p>See also above.</p> <p>During the early stages of project development, the Applicant liaised with Bacton Gas terminal operators to consider the possibility of deploying brownfield sites adjacent to the gas terminal and associated operations (see also below),</p> <p>Security is a factor dealt with by any major infrastructure project. It, along with consideration of the potential for accidents and disasters, is dealt with in the ES. As the Applicant has selected Happisburgh South as the landfall location, the security concerns associated specifically with co-location close to the gas terminal are addressed.</p> <p>The project cannot influence coastal processes, nor plans agreed by responsible authorities in relation to local adaptation and mitigation responding to these processes. The project team has noted local concerns, has gained an understanding of the Coastline Management Plan and predicted modelling of any changes expected over the lifetime of the Norfolk Vanguard (and Norfolk Boreas) projects, and sought to learn about engineering proposals being considered to manage the effects of coastal processes on existing infrastructure projects in the area, in so far as these may have consequences for any emerging Norfolk Vanguard (and Norfolk Boreas) proposals.</p>

Summary Issue	Applicant response and influence on the project
	<p>Studies have been commissioned by the Applicant to ensure that HDD techniques could be safely deployed at landfall, both in terms of ensuring any buried cables would not be exhumed by dynamic erosion, and also that the effects of drilling do not affect the integral strength of the strata intersected.</p>
<p>Finding the best cable relay station location In relation to the location of the proposed cable relay station, most concerns highlighted in feedback responses were about visual impact and noise.</p> <p>Feedback was also provided in relation to bat and bird foraging sites, and other natural habitats known to local residents and community members.</p>	<p>The EIA process considers landscape and visual impact as well as noise and many other factors as key parts of the assessments. Of course, it is not possible to fully appreciate all the landscape features and viewpoints nor the quiet spaces cherished by local people and visitors to the area, without their feedback.</p> <p>While at this stage with no proposals described in detail, there was little information on which people could comment directly, rather, local concerns about possible disruption to a quiet, rural way of life were duly noted.</p>
<p>Finding the best underground cable corridor A significant amount of interest was generated on this issue, given the initial wide scope of the proposed underground cable corridor. General comments received during Phase I of the non-statutory consultation period referred to how works would be undertaken, sometimes making reference to past experience in the area.</p> <p>Some responses sought to highlight concerns about the potential disruption caused during the construction phase, with issues such as the damage caused to local roads, potential impact on drainage systems and the impact of cable storage on the local roads were cited by respondents.</p> <p>Feedback from consultees with land interests also highlighted drainage and ‘heavy soils’ concerns and suggested that away from the coast, northern cable corridor routes may be preferable. These consultees also requested more information about construction methodology and reinstatement of their land post construction.</p>	<p>At this stage, the scope of the consultation was broad and therefore the feedback was correspondingly general, however it did highlight local interests and the need, especially given recent local accounts of experiencing other cable burial operations, for adequate information and reassurances to be provide as the proposals and ideas about construction methodologies emerged.</p> <p>The newsletter which followed the Phase I consultation provide more information on how the Applicant has managed other cable burying operations and about reinstatement of the land.</p> <p>It was also determined at this point that as useful information became available, the Land team would produce an information pack and dedicated page on the website, aimed specifically at addressing local landowner and land occupier interests, including construction techniques and embedded mitigation to minimise impacts.</p> <p>Responding to feedback from local landowners, the project team noted soil quality information. In preparation for Phase II of informal consultation events, additional information leaflets were prepared to provide further information on underground cable installation. Digital animation films were also prepared to illustrate the horizontal directional drilling process as well as cable trenching sequences.</p>

Summary Issue	Applicant response and influence on the project
<p>Finding the best possible substation location.</p> <p>During the first drop-in at Necton, and echoed in feedback forms, there were many concerns expressed in relation to more development of electrical infrastructure in the area.</p> <p>Some people responded directly to the request for views on how to locate necessary infrastructure sensitively and appropriately, and made their comments in relation to the sectors (S1-5) specifying a preference for one or more sectors over others. A handful of respondents who expressed a positive preference for a particular sector suggested that new infrastructure should be located close to (within 1 km) of the existing 400KV National Grid substation near Necton.</p> <p>Some suggestions indicated a preference for locating the project substation to the east, to take advantage of existing woodland which could screen the substation, and views of it from the village of Necton.</p> <p>A number of respondents preferred to indicate where they did not wish to see additional infrastructure – not closer to the village of Necton itself, not to the west and north of the existing National Grid substation, around Little Dunham and Little Fransham.</p> <p>Specific concerns expressed in relation to the siting of the substation. related to potential permanent visual and noise impacts, fears about the effect of electrical infrastructure and EMF close to homes and disruption during construction.</p> <p>Participants described the inconvenience and distress caused during the construction of the existing infrastructure and subsequent mitigation works, resulting from light pollution, as construction lights were left on overnight, construction noise and construction traffic utilising local roads.</p> <p>Some dissatisfaction or disappointment was expressed in relation to the decision, taken by National Grid in conjunction with the Applicant that Norfolk Vanguard would connect power from the offshore wind farm</p>	<p>The varied responses from residents of the Necton area and surrounding villages seemed to indicate that there was not an obvious place to locate the project substation that could immediately satisfy all local interests and needs. Rather, there was a general desire that the project substation be located as far away as practicable from homes and communities, and for communities not to see or hear the project during operation. Taking these views into consideration alongside the considerations, constraints and opportunities explored as part of the EIA process, the project focussed in response at looking for suitable locations either close to the existing substation, or to the east, where infrastructure could be hidden by existing woodland and hedgerows. This, the project substation search area, was refined to consider a keyhole shaped zone, corresponding to S5 and S1, of the sectors originally delineated for consultation during Phase I.</p> <p>The project team was able to describe in lay terms the process of determining the project’s connection to the National Grid. The Applicant described National Grid’s statutory duty to ensure a co-ordinated, efficient and economic solution to the maintenance and operation of the national grid network, as it develops and responds to the UK’s changing supply and demand profile. The Applicant explained the options originally considered and outlined why Necton was deemed by the National Grid and the project team to represent the most appropriate connection point offered to the Applicant by National Grid.</p> <p>The project team also noted local people’s desire to gain a better understanding of what a project substation might look like and determined to provide improved visual aids to help people respond to the next phase of informal consultation.</p> <p>To this end, it was decided that an initially quite rudimentary 3D model and digital animation showing the key elements of the project, should be developed further to help people visualise and understand better the project design and EIA process. The first 3D model showed the wind park with turbines offshore, and the foundations securing the turbines to the seabed, offshore transmission cables, landfall, and showed a general route onshore along which transmission cables might run to connect power into the National Grid at the existing 400kV National Grid substation near Necton. As project proposals became a little more refined, the</p>

Summary Issue	Applicant response and influence on the project
<p>into the existing 400kV National Grid substation near Necton, asking “why Necton?”.</p>	<p>modelling could show indicative landfall and CRS search zones and cable corridor options, as well as show modelled impressions of what CRS and project substations might look like within the local landscape.</p>
<p>Bringing value and opportunity to the area A wide range of responses were received on this, many of which were related to training and skills development, and providing jobs for the future.</p> <p>Issues such as the inclusion of young people in training and apprenticeship schemes, increasing school places, obtaining skilled workers from the local area and the projected increase in local employment levels were all raised in relation to this issue.</p> <p>Some suggestions were made at the Necton drop-in event that a roundabout to help improve access to and from the A47 might be a useful local development, and possibly “compensate” the host village and residents for accommodating permanent project infrastructure.</p>	<p>The project team has noted since this time an interest in jobs, skills, training and education development, which can help local people derive greater benefits from large infrastructure investments, by accessing roles and providing services required during development, construction and operation and maintenance (and eventual decommissioning) of projects like Norfolk Vanguard and Norfolk Boreas.</p> <p>From January 2017, much work has been undertaken to understand and contribute, where appropriate, to existing skills, training and education initiatives. The project team has regularly reported in “Vattenfall in Norfolk” newsletters and via other channels where progress has been made, and where the project is able to take (initially) small steps to help local initiatives and individuals develop the skills and training agenda. The Applicant has also reported where contracts were agreed with local companies, showing how even during development stages, offshore wind farm projects can and do contribute to the local economy by awarding contracts and supporting the local supply chain.</p> <p>While the role of the Applicant is not to consider highways issues, the Applicant did express an openness to consider potential access improvements to mitigate for any possible construction or operations related traffic impacts in the area. They responded positively to later meeting requests from the Local MP, the Rt Hon George Freeman to meet with him and representatives of NCC and Highways England to discuss the topic of a roundabout at Necton. The meeting did not conclude an unequivocal need for a roundabout to accommodate entry onto the A47 at Necton, however, the Applicant agreed to share any relevant traffic monitoring data with the authorities, who would continue to consider the issue whilst working with Necton Parish Council to understand the local challenges and opportunities in the area.</p>
<p>Enhanced consultation Generally, there was a positive response to consultation materials, however, a number of consultees also expressed a desire to see more visual aids to understanding the project and especially proposed permanent</p>	<p>As a result of feedback, it was determined that future newsletters reaching all households within the Scoping area (and subsequently the PCZ), should provide some visual aid to understanding the project. Therefore, the Applicant included imagery, including photomontages in subsequent newsletters.</p>

Summary Issue	Applicant response and influence on the project
<p>onshore infrastructure, such as CRS and the onshore project substation.</p> <p>Requests were received from residents in and around Reepham for drop-in events in that location.</p>	<p>The Applicant also included more maps of a larger size in future display boards (during Phase II and statutory consultation). The Applicant also ensured an updated 3D digital interactive tool was available at events run by a qualified operator to help consultees visualise elements of the project.</p> <p>Additional drop-in exhibitions were included in Reepham, and Bacton (Bacton in response to high volumes of Bacton residents attending the Happisburgh event) in future consultation phases as appropriate.</p>

17.2. Non-Statutory consultation: Phase II summary issues and influence on the project

- 354. The project refinements presented for informal consultation at the start of Phase II are outlined below (see also Appendix 12.8 – Phase II consultation materials).
- 355. **Offshore and onshore:** an overview was provided to describe factors considered by the EIA process and project design principles.
- 356. Onshore, an indicative cable corridor and environmental survey areas had replaced the general scoping area. Further detail was proposed for review and feedback, showing proposed locations for undertaking horizontal directional drilling underneath sensitive features such as rivers and main transport arteries, as well as possible mobilisation zones.
- 357. At landfall three search zones were considered, from north to south. These were at Bacton, Walcott Gap and near Happisburgh.
- 358. Seven possible cable relay station search zones were presented for consultation.
- 359. The onshore project substation search zone had been refined to a key hole shape reflecting feedback that suggested either considering co-location of project substation infrastructure close to the National Grid and existing substation works, or further away from Necton towards the east to take advantage of screening from existing woodland, trees and hedges.
- 360. The table below summarises the issues raised through consultation and explains how they have influenced the design of the project.

Table 17.2– Summary of issues and regard had by the Applicant to Phase II feedback

Summary Issue	Applicant response and influence on the project
<p>Landfall Regarding the landfall location, many residents were concerned that, should landfall be sited at Bacton or Walcott, there would be an unacceptable impact on the local population.</p> <p>The majority of the comments received expressing a preference for any of the possible landfall zones, stated that a location near Happisburgh would be the most appropriate location for landfall. Some of the comments received during Phase II of the Non-Statutory consultations on this issue suggested that as there are fewer people in the Happisburgh area, compared to Bacton and Walcott, this would have lower social impacts.</p> <p>Some responses considered the southern landfall zone more appropriate as it would mean that offshore cables could avoid traversing the Marine Conservation Zone (MCZ). A great number of participants felt that any landfall location should consider opportunities to defend the coastline, given the issues of coastal erosion affecting much of the north Norfolk coastline. Respondents also sought to highlight that the idea of rocks forming a lagoon to protect this area was a good idea and would ease the flooding issue particularly in Walcott/Bacton.</p> <p>Other general issues raised on the topic of landfall included calls for assessing and protecting the archaeology at Happisburgh, and the general conclusion that Happisburgh was the most sensible area to locate landfall taking into account competing factors (especially as it was outside of the Marine Conservation Zone and is away from the Priory and Bacton Woods).</p>	<p>Three defined landfall search zones focussed local responses more than a wider area presented during Phase I. Arguments for and against locating at each of the three landfall search zones under consideration were duly noted by the project team.</p> <p>In response to preferences expressed for locating landfall at either Bacton or Walcott Gap the project pointed out two relevant factors:</p> <ul style="list-style-type: none"> a) An early project commitment not to consider laying underground cabling under people’s homes; and b) A strategic decision to develop and co-locate onshore project infrastructure of both Norfolk Boreas and Norfolk Vanguard together. <p>These two factors mean that the Bacton and the Walcott Gap options present significant space constraints, particularly in view of the HVAC CRS.</p> <p>In addition, landfall at either of these northern locations would require the offshore cables to be laid through the MCZ, noted by both statutory consultees and community members as a valuable asset, and important designation. No infrastructure has been consented nor located within it, since the designation granting it legal protection was awarded.</p> <p>As noted in responses to Phase I consultation, the project team note local concerns about coastal erosion and the threat of flooding. A study was initiated, investigating the impact of coastal erosion and predicted coastal retreat over the lifetime considered in the Shoreline Management Plan for the Happisburgh area on the area and its long-term implications for the proposals.</p> <p>This study, along with planned site investigations providing detailed geological and geotechnical information, would enable the Applicant to ensure that any works undertaken will not exacerbate coastal realignment processes. The Applicant also noted that it was engaging with relevant organisations regarding coastal issues.</p> <p>In response to local comments about the Happisburgh Footprints (see also Phase I), in early 2017, a special topic group was established</p>

Summary Issue	Applicant response and influence on the project
	<p>to consider any opportunities and constraints that should influence project design in relation to the paleoarchaeological significance of the locality. This comprised project engineers, and persons with academic, historic and (in response to local business interests and coastal adaptation plans), tourism interests. It was agreed that members of this group should oversee the collection and recording of data derived from surveys and environmental assessments of the area. In this way, project investigations would add to the body of knowledge surrounding the geological and archaeological setting of the footprints and would continue to do so for as long as appropriate.</p>
<p>CRS On the issue of the CRS respondents during Phase II of the non-statutory consultation continued to highlight concerns about the potential visual impact of CRS should they be required. More specifically, respondents clearly rejected the proposed CRS location ‘Site 4’ due to its proximity to the Bromholm Priory (also known locally as Bacton Abbey) and its position as a National Heritage site.</p> <p>A key theme of the responses received on this issue was the expectation that if the landfall of cables from the project was located in the northern area of the landfall search zones being considered, then any CRS should be placed as close as possible to the existing gas terminal infrastructure, in order to avoid the spread of industrial infrastructure across the area.</p> <p>A significant number of respondents also expressed their preference for utilising HVDC technology over the use of HVAC technology.</p>	<p>During this phase of consultation, in response to earlier requests to show what CRS installations might look like, digital representations of the CRS were shown, along with modelled representations of the infrastructure in two example locations (of the seven possible CRS Search Zones).</p> <p>Several suggestions were made in relation to locating CRS if possible close to existing infrastructure and both the Bacton Gas terminal (and adjacent brownfield sites) and the industrial estate near North Walsham were suggested as suitable locations. Two potential sites, within / immediately adjacent to the Bacton Gas terminal, were investigated but technical and space constraints identified eliminated these two options. North Walsham industrial estate was discounted for technical reasons and other northern CRS search area options were discounted due to historic environment, landscape and visual impacts and because of their distance from the landfall search area.</p> <p>The project continued to inform communities and consultees that both HVDC and HVAC transmission options were serious considerations and that neither option had been ruled out. The project newsletter featured a section on innovation and considered how innovation was moving fast and helping to make the deployment of offshore wind farms possible in more extreme locations, further from shore. Among the important technology developments enabling this rapid expansion of offshore wind, is the development of new transmission solutions. Some of the pros and cons of HVAC vs HVDC have also been communicated by the Applicant.</p>

Summary Issue	Applicant response and influence on the project
	<p>Since this topic was highlighted as being of interest, a focused workshop was organised for local communities potentially affected by CRS siting (see Chapter 14).</p>
<p>Cable Corridor Many of the responses received in relation to the underground cable corridor route were focused on the construction and management of the project. These responses stemmed from the recognition among local residents that the impacts associated with the construction of the underground cable corridor were, in the main, temporary.</p> <p>Responses from landowners and land users were particularly focussed on the trenching and cable installation process, and in discussing where trenchless installation could be considered and deployed.</p> <p>Another key theme running throughout the responses received on this issue was concern about the potential impacts that the construction of the underground cable corridor could have on traffic in the area, with many respondents choosing to highlight that a significant number of local roads are narrow and therefore unsuitable for heavy goods vehicles.</p> <p>A consultee highlighted the potential for buried archaeological remains close to Kerdiston Church near Reephram and noted the proximity of the cable corridor to this historic site.</p>	<p>Information was provided in response to local landowner and wider interests about the cable corridor and construction techniques, in the form of a Landowner information pack, and project ‘Frequently asked Questions’.</p> <p>Changes were made to the cable corridor route moving it away from Kerdiston Church.²¹</p>
<p>Onshore Project Substation Residents of Necton and the local area provided varied feedback in relation to the revised project substation search area and the illustrative digital model presented to show what HVAC and HVDC substations might look like in the local landscape. While again some people expressed a desire for substation infrastructure to be located close to existing infrastructure some specified not on the Necton side (southern side) of the existing substation, while others suggested that infrastructure should not be located within 500m of any houses.</p> <p>Some people suggested means of reducing visual impacts; painting the buildings so that they blend</p>	<p>The feedback received again indicated that there is no local consensus about the best location for siting the project substation. Thus, following the EIA process and continuing to consider all relevant environmental constraints and opportunities is the best way to determine an appropriate substation location.</p> <p>The project team therefore determined it would be best to “bring the local communities with us” through the process by helping them to understand all relevant constraints and opportunities and to try to reassure residents that appropriate mitigation would eliminate, reduce or otherwise compensate for any environmental effects.</p>

²¹ The final cable corridor route proposed within the submitted application moves further away again from Kerdiston.

Summary Issue	Applicant response and influence on the project
<p>better with the local landscape or placing them within topographic lows. Others preferred to suggest alternative locations, away from the current substation, for example on the “rural (western) side of the A47 or several kilometres away to the southeast”.</p>	
<p>Opportunities and benefits Many responses received during Phase II of the non-statutory consultation identified potential benefits that could be associated with the project in addition to the key environmental benefits of reducing the UK’s carbon emissions. A key theme of the responses received regarding this issue was the project’s potential for significant levels of job creation and support for the local economy.</p> <p>In particular, many responses sought to emphasise the need to train young people in the area in order to provide them with the skills necessary to oversee the management, maintenance and construction of wind farms. Another key theme identified within responses on this issue was the project’s potential to help improve the current infrastructure in the region, in particular the possibility of utilising the construction on the onshore cable route to improve regional connectivity through the installation of fibre optic cables for high speed internet.</p>	<p>In response to ongoing interest in the skills development and jobs agenda, the Applicant continues to liaise and collaborate with other skills providers in the area, notably, EEEGR, UTCN, UEA and others. The Applicant has worked with 3D Webtech (3DW) to develop a 3D visualisation programme that is an interactive learning tool to help students understand the constraints and opportunities, the economic and technical factors as well as the consultation requirements of developing a modern offshore wind farm. Originally developed to help encourage local participation by younger people, it is also proving to be a learning tool with significant potential at different academic levels.</p> <p>The Applicant also committed to beginning early talks with the local supply chain, to ensure that local companies are poised and prepared to take advantage of local opportunities offered by the development of Norfolk Vanguard and Norfolk Boreas.</p> <p>The Applicant has entered into exploratory talks with a local group, who are responding to local needs for better broadband to the home. The Applicant is keen to work with communities who identify means by which the project can open and enable local opportunities and benefits to be realised.</p>
<p>Enhanced consultation In response to the question “I am reassured the Environmental Impact Assessment processes, including consultation will lead to the best possible environmental solutions for Norfolk Vanguard and Norfolk Boreas” posed in the Phase II questionnaire, the lowest confidence in the EIA process was recorded by consultees living close to proposed onshore permanent infrastructure i.e. around landfall, CRS and onshore project substation.</p>	<p>In order to encourage a greater understanding of and confidence in the EIA and site selection process, the project team decided to hold two focused workshops to help potentially most impacted communities understand and contribute to the site selection process. To this end the Phase IIb workshops and associated drop-in events were organised (see Chapter 14).</p>

361. Following the end of Phase II informal consultation, the project team studied the data gathered to date including consultation results and, with regard to the feedback

received, refined the project proposals where possible. Minor changes were made to the underground cable corridor at this stage, as little information had emerged with regard to constraints and opportunities unknown to the team during consultation.

362. However, the landfall, cable relay station and project substation search areas were refined, the changes were described and mapping shared (in the June 2017 project newsletter and on line, via the interactive map). In summary:

Landfall search zones: In order to avoid offshore cables traversing the Marine Conservation Zone, to enable the co-location of Norfolk Vanguard and Norfolk Boreas transmission cables and to maintain two cable corridor options near landfall (and temporarily) to accommodate cable relay station options (if required), the landfall search area was refined to an area south of Happisburgh village.

Cable Relay Stations (CRS) search zones: two possible search zones were selected as offering the best potential to meet the technical requirements of the project, suggest the least impacting options according to the EIA process, these were formerly called Zones 5 and 6: They offered relative seclusion (avoiding villages and clusters of housing), space to co-locate Norfolk Vanguard and Norfolk Boreas project CRSs should they be required, good access and some natural screening and topographic characteristics to help minimise visual and noise impacts. It was noted that more work would be undertaken in order to determine the best location of the CRS should they be required (in the case of an HVAC power transmission system). At this point the project intended to apply for consent for both HVAC and HVDC technologies in order to help future-proof the projects, by deploying best in class technology when ready to begin procurement and construction in the early 2020s.

The onshore project substation: the search area was further refined to focus within an area to the east of the existing Dudgeon substation. As expressed by many local people, this area offers relative seclusion, maximising the distance from clusters of housing, without being too distant from the existing National Grid substation and natural screening and topographic characteristics that can help minimise visual and noise impacts, which featured highly among local residents' primary concerns.

363. At this stage the project team felt that it was necessary to reduce the size of the design envelope further, refining further the key elements defined above. Of primary importance was to narrow the CRS search zone and the substation search zone.
364. Engagement undertaken to this point with local communities living around Happisburgh and inland, near potential CRS search zones and in the area of Necton, had shown the strength of local engagement with the project and the willingness to engage in the process and influence project development in order that the most

sensitive projects could be brought forward. Previous engagement had also indicated that it was in these areas that communities felt least confidence in the EIA process (see “Hearing Your Views I & II” Appendices 3.1 and 3.2). By now, following surveying and a well progressed EPP the Applicant was also building a robust understanding of EIA constraints and opportunities which the Applicant wanted to share as far as possible with local communities who would potentially host permanent above ground infrastructure associated with the projects.

365. It was decided therefore to hold two focussed workshops, one near the CRS search zones, and another near the substation search zone.

17.3. Non-statutory consultation: workshops summary issues and influence on the project

366. In collaboration with the land team the Applicant attempted to identify properties located closest to these two search areas, also referring to its database of people already engaged with the consultation process in order to ensure interested parties were invited to take part in the workshops. To this end, a wide range of members of the local community were sent invitations, encompassing local residents and property owners, parish councillors and other elected representatives, community groups and (in each case) the local campaign group. The Applicant also requested that they let other people know about the workshops and the drop-in sessions arranged for the following day so that people self-identifying as potentially most affected by the proposals could attend either the workshop or drop-in session.
367. The purpose of the workshop was made clear from the start; to discuss site selection of CRS and project substations (as noted in the invitation letters and workshop agenda contained in Appendix 14.2). This purpose was detailed both in the invitation letter and in an outline agenda sent with the invitation letter. In order to ensure the best use of participants’ time and to make the event productive for all, the session was run by independent local facilitators. In addition, to ensure the workshops could be planned and managed effectively, the Applicant asked that people registered in advance their intention to participate. The invitation letters also detailed the timings and locations of drop-in sessions to be held the following day, open to all with an interest in the theme of the work being undertaken. These sessions allowed people to see the materials presented at the workshops, to discuss with project team members, to view the comments made by residents and workshop participants and to add their own views, ideas and concerns.
368. Following the workshops, the materials used to inform the dialogue were published on the project website, along with reports documenting the feedback received. These can be viewed in Appendix 14.5 and 14.9.

- 369. Responding to earlier requests from communities at both CRS and substation search areas, as much visual information as possible was offered to help people appreciate the EIA process. This was in the form of constraints maps sequentially showing how site selection had progressed following scoping, a 3D digital interactive model of the project options under consideration and photomontages.
- 370. The table below summarises the issues raised through consultation and explains how they have influenced the design of the project.

Table 17.3– Summary of issues and regard had by the Applicant to Phase IIb feedback

Summary Issue	Applicant Response and Influence on the project
<p>CRS workshop</p> <p>Three possible footprints were considered by participants attending the workshop, one in the former site 5 (5a) and two in the former site 6 (6a and 6b).</p> <p>Participants were invited to comment on the “pros” and “cons” of each footprint and asked to consider ways to “reduce impacts” at each site, they were also invited to make any additional general comments in relation to the project.</p> <p>Many people re-expressed their desire that Norfolk Vanguard and Norfolk Boreas should adopt HVDC transmission technology thereby eliminating the need for CRS at all. Following this, comments were made about different siting options. Comments covered proximity to dwellings, visual and landscape images especially in relation to historic churches in the area, access issues, proximity to local amenities like Munn’s Loke, concerns about impacts on wildlife, impacts on local tourism businesses and homes and difficulties screening buildings effectively as it was argued that trees do not grow rapidly so close to the sea.</p>	<p>The Applicant redoubled efforts to explain why it was necessary at this stage to maintain the option to deploy both HVDC and HVAC technology.</p> <p>Following assessment of the feedback received and information that had been gathered about local archaeology, the choice of CRS footprints was reduced further to consider a site approximating footprint 5a, and a variation of footprint 6a, but adopting a more North-South orientated configuration of the Norfolk Vanguard and Norfolk Boreas CRS. The team recognised that site 5a potentially presented better access and was a little further away from the closest homes, although there were more homes close by. Site 6a was a little closer to individual properties than other options and would require new access from the local B1159 however it could benefit from some existing mature vegetation, which would assist with screening. Following the workshop further investigations into the heritage settings of the potential sites, and examination of aerial photography and geophysical investigations were commissioned to determine if there was increased likelihood of disturbing any (currently unknown) buried archaeology in either the Foxhill or East Ruston areas.</p> <p>The main note made by the project team was that all sites presented challenges to the sensitive siting of the CRS and careful assessments of constraints and opportunities needed to continue through to the next stage of project refinement.</p> <p>It was felt that local communities understood and appreciated the complexity of the decisions being made, and to a degree felt more involved in the EIA process, and thus would continue to provide evidence-based views in response to ongoing consultation, and especially ahead of the statutory consultation.</p>

Summary Issue	Applicant Response and Influence on the project
<p>Substation workshop</p> <p>Four possible footprints were considered by participants attending the workshop (labelled 1,2,3,4). Footprint 1 and 2 and footprints 3 and 4 respectively shared some broad similarities. 1 and 2 were located somewhat further away (and to the East) of the village of Necton, on slightly elevated ground, but with good use of existing hedgerows and woodland to provide visual screening, 1 requiring less site preparation than 2 as it is on more level ground. Sites 3 and 4 were situated a little to the west, closer to Necton, on lower ground but with less possibility of being screened effectively by existing woodland and hedgerows, also both sites were on less level ground and would require considerable works to ready the area for construction.</p> <p>Comments covered proximity to dwellings, and the fear that properties might be blighted or devalued by the development, visual and landscape concerns, fears that acceptable noise levels would not be met, that the rural nature of the area would be negatively impacted. There were also health concerns, in relation to living close to project substations.</p> <p>Various suggestions for alternative onshore project substation locations were brought forward by consultees notably at Top Farm and at Scarning.</p>	<p>On balance, the views of those involved during both the workshop and subsequent drop-in seemed to point towards a strong desire to locate the substation as far as practicably possible away from homes and to minimise visual impacts to nearby properties, through the effective use of screening. People were also concerned that noise levels might be unacceptable, and again that mitigation and distance from homes would help reduce long term impacts.</p> <p>These factors and views were noted by the project team as they considered the site selection of the project substations, ahead of statutory consultation.</p> <p>It was felt that local communities understood and appreciated the complexity of the decisions being made, and it was hoped that many would feel more involved in the EIA process and would continue to provide evidence-based views in response to ongoing consultation, and especially ahead of the statutory consultation.</p> <p>Useful feedback was received and noted in terms of refining construction methods and building embedded mitigation of temporary disruption (during construction) into the project plans. In particular, the workshop highlighted local access challenges, and the need to reduce traffic through the village of Necton and the normal access on to the A47.</p> <p>Once again, consultees noted the value of visual aids to consultation.</p> <p>The project team has considered these alternative locations. They are outside the options originally considered by National Grid according to the Horlock Rules, and no overarching merits to these sites were noted in subsequent assessments.</p>

371. A full overview of the key issues raised, and the regard had to these issues by the Applicant, can be found in Hearing Your Views I and II, contained in Appendix 3.1 and 3.2.

17.4. Summary of EPP project commitments during the non-statutory consultation period

372. In addition to the feedback and project refinement decisions taken through informal consultation with the local community and landowners, a number of key issues were considered through the EPP.
373. Table 17.4 below summarises the project commitments that arose through the EPP during this period.

Table 17.4 – Summary of EPP project commitments during non-statutory consultation

Summary Issue	Applicant response and influence on the project
<p>Offshore cable installation Natural England is concerned about impacts on protected habitats within the Haisborough, Hammond, Haisborough Special Area of Conservation (SAC).</p>	<p>Natural England has requested that any sediment arising within the SAC during offshore export cable installation is deposited back into the SAC to allow the sandbank system to be replenished. Norfolk Vanguard Limited has committed to this within the DCO application.</p>
<p>Site selection Possible impact to sites of importance to nature conservation due to location of onshore infrastructure.</p>	<p>A decision was made at the pre-scoping phase to avoid Statutory Designated Sites for Nature Conservation when making decisions regarding onshore infrastructure locations. A decision to avoid ancient woodlands was also made at the pre-scoping stage.</p>
<p>Trenchless crossings Concern regarding potential impact to major water courses which the onshore cable route may cross.</p>	<p>A decision was made at the pre-scoping phase to employ trenchless techniques at major watercourses.</p>

17.5. Landowner feedback and key issues raised during non-statutory consultation

374. A number of general comments have arisen from the meetings held with landowners and these can be summarised as follows as per Table 17.5, below.
375. All other feedback provided by landowners as part of the non-statutory consultation during Phase I, Phase II and Phase IIb has been dealt with alongside all other feedback received and dealt with in Chapter 17.

Table 17.5 – Summary of issues and regard had by the Applicant to landowner feedback during non-statutory consultation

Summary issue	Applicant Response and influence on the Project
<p>Requests to decrease the length of time that it takes to reinstate land and return it to farming.</p>	<p>The land will be reinstated after duct installation by the Applicant’s contractors. Any claims for loss in crop yield during reinstatement will be on an individual basis.</p>

Summary issue	Applicant Response and influence on the Project
<p>The amount of land that is required for the project. Length of time the cable trenches will be left open.</p>	<p>The amount of land required and the construction timescales will be determined by the engineering requirements of the project. As assessed in the ES, for some works this may extend to 2 years for duct installation. The Applicant does not expect the entirety of the cable route to be left open for this period. However, given that there is potential for this to occur, the rights to do so need to be acquired by the Applicant and have been assessed within the ES. This will be factored into any payments which are to be made to landowners.</p>
<p>Awkward shapes of field left during construction.</p>	<p>Areas of fields which are unviable to farm due to the location of the cable works during construction can be taken into consideration when calculating crop loss payments.</p>
<p>Requests to reroute the cable corridor as far from residential properties as possible.</p>	<p>All requests to realign the cable route were considered against relevant constraints, including engineering and environmental and the majority of those suggested by affected landowners have been incorporated into the final route design.</p>
<p>Loss of cropping and farming income.</p>	<p>Claims for crop loss as a result of operational access will be dealt with on an individual basis.</p>
<p>General comments relating to compensation levels.</p>	<p>Concerns about compensation amounts will be addressed as part of the commercial agreements that the Applicant will negotiate with landowners.</p> <p>Landowners were informed that a Heads of Terms agreement setting out the proposed terms of payment and the main commercial points would be issued after the formal consultation process had concluded. (These were issued to identified landowners and instructed land agents in May 2018.)</p> <p>The Applicant is seeking to reach voluntary agreements with all affected land interests.</p>

18. APPROACH TO STATUTORY CONSULTATION UNDER SECTIONS 42, 47 AND 48 OF THE 2008 ACT

18.1. Overview and introduction

- 376. This Chapter of the Consultation Report sets out the approach taken to formal consultation and publicity under sections 42, 47 and 48 of the 2008 Act for the project.
- 377. The activities undertaken under sections 42, 47 and 48 are provided in detail in Chapters 19, 20 and 21 respectively. Together, these Chapters seek to provide the information required under section 37(7)(a) of the 2008 Act and the relevant parts of the DCLG guidance on pre-application consultation.

18.2. Vattenfall's approach to statutory consultation

- 378. The Applicant has sought from the outset to undertake a single stage of statutory consultation on preferred project parameters following extensive non-statutory consultation and ongoing engagement with consultees, stakeholders and local communities.
- 379. As a result of early and continuous engagement, including two stages of non-statutory consultation and project design refinements, a single phase of statutory consultation was possible.
- 380. Non-statutory consultation phases punctuated continuous informal engagement and took place at the point of Scoping in October 2016, and to seek views on underground cable route corridor in March and April 2017.
- 381. Statutory consultation took place in November and December 2017.

19.FORMAL CONSULTATION UNDER SECTION 42 OF THE 2008 ACT

19.1. Overview and introduction

382. This Chapter of the Consultation Report sets out the activities undertaken by the Applicant to comply with its duty to consult under section 42 of the 2008 Act. It seeks to provide the information relevant to formal section 42 consultation as required in the Consultation Report under section 37(7)(a) of the 2008 Act and the relevant parts of the DCLG guidance on pre-application consultation.
383. The Chapter concludes with a Statement of Compliance summarising the regard that the Applicant has had to relevant legislation and guidance in carrying out its duties under section 42.

19.2. Legislative context

19.2.1.1. Duty to Consult under section 42

384. Section 42 of the 2008 Act requires the applicant to consult the following about the proposed application:
- a. such persons as may be prescribed;
 - aa. the Marine Management Organisation (offshore schemes);
 - b. each local authority that is within section 43 of the Act;
 - c. the Greater London Authority if the land is in Greater London; and
 - d. each person who is within one or more categories set out in section 44 of the Act.
385. For the purposes of section 42(a) of the 2008 Act, the persons prescribed are those listed in column 1 of the table in Schedule 1 to the APFP Regulations (as amended).
386. With regard to section 42(b), local authorities are defined as those within which the land to which the proposed application relates is located (section 43(1)). It also includes those local authorities that share a boundary with that authority (section 43(2)). This is referred to in more detail in Section 19.3.
387. For the purposes of section 42(d), a person is within section 44 of the 2008 Act if the applicant knows that the person is an owner, lessee, tenant or occupier of the land (Category 1, section 44(1)); is interested in the land or has power to sell and convey the land or to release the land (Category 2, section 44(2)); or is entitled to make a relevant claim if the order sought by the proposed application were to be made and fully implemented (Category 3, section 44(4)). This is referred to in more detail in Section 19.3.

388. There is a duty on the applicant, when consulting a person under section 42, to notify them of the deadline for receipt of comments to the consultation (section 45(1)). This must be a minimum of 28 days, commencing on the day after the day on which the person receives the consultation documents (section 45(2)). Consultation documents must be supplied to the person by the applicant for the purposes of the consultation (section 45(3)).
389. DCLG guidance at paragraph 26 notes that in addition, applicants may also wish to strengthen their case by seeking the views of other people who are not statutory consultees, but who may be significantly affected by the project.

19.2.1.2. Duty to Notify PINS of Proposed Application under Section 46

390. Aligned with formal consultation under section 42 is a requirement for the applicant to notify PINS of the application under section 46. This must be done on or before commencing consultation under section 42 (section 46(2) of the 2008 Act) and PINS must be supplied with the same information as is proposed to be used for section 42 consultation (section 46(1)).

19.3. Defining Section 42 consultees

391. The following sections describe how the prescribed bodies, local authorities and significantly affected persons to be consulted under section 42 of the 2008 Act were identified. It then sets out the approach taken to formal consultation for the project under section 42.

19.3.1.1. Prescribed Consultation Bodies

392. The List of Prescribed Consultation Bodies Notified by the Planning Inspectorate under Regulation 9(1)(A) of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (As Amended) (now incorporated under Regulation 11 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017) were consulted under section 42 as part of the pre-application process.
393. Prescribed bodies cover the main regulatory bodies including 'technical' bodies with specific expertise and/or regulatory responsibility for a given discipline.
394. A list of the Prescribed Bodies consulted under section 42 is included in Appendix 19.1.

19.3.1.2. Local authorities

395. Section 42(1)(b) of the 2008 Act states that applicants must consult all local authorities which fall within one of the categories detailed in section 43 as follows:

- "B" Authorities (a unitary or district council in which the project is located)
- "A" Authorities (a unitary or district council which borders a "B" authority)

- "C" Authorities (a county council in which the project is located)
- "D" Authorities (a unitary or district council which borders a "C" authority).

396. Table 19.1 shows all Local Authorities that were consulted under section 43. The following map shows how these authorities were identified.

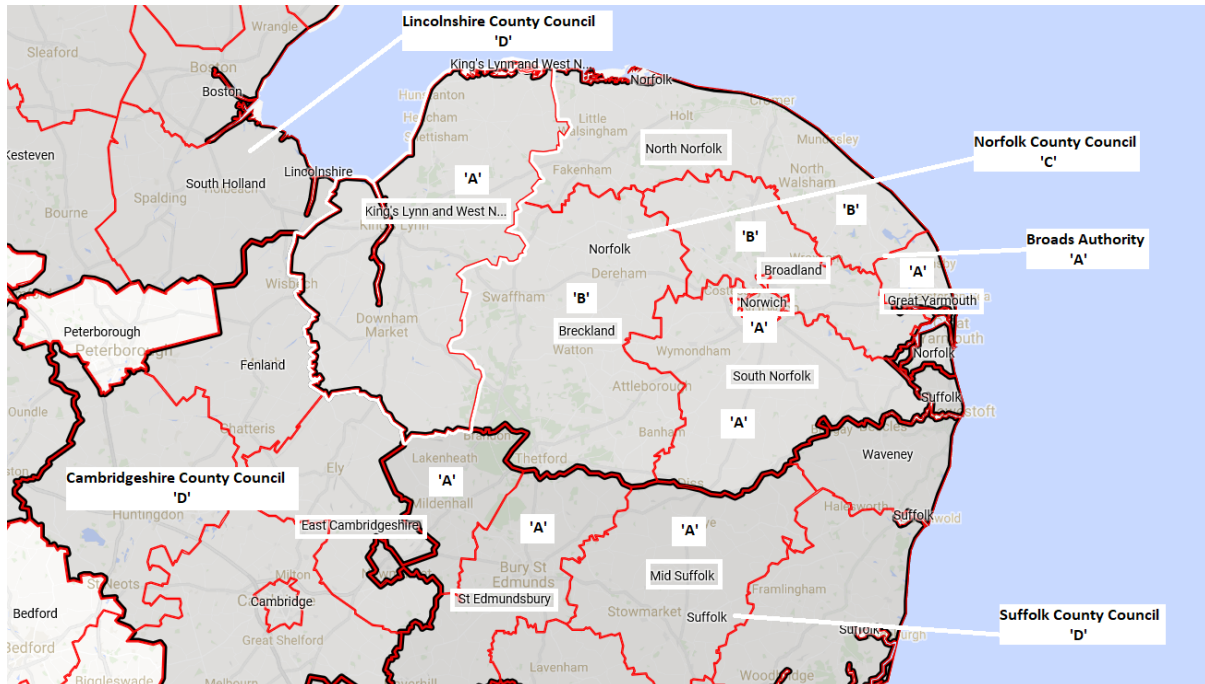


Figure 4 – Section 43 Local authorities (Map courtesy of Google 2018)

Table 19.1 Local Authorities consulted under section 43

Organisation	Category
South Norfolk Council	A
Norwich City Council	A
Borough of King's Lynn & West Norfolk Council	A
Great Yarmouth Borough Council	A
Broadland District Council	B
Breckland District Council	B
North Norfolk District	B
Norfolk County Council	C
Suffolk County Council	D
Lincolnshire County Council	D
Cambridgeshire County Council	D
The Broads Authority	A
Mid Suffolk District Council*	A

Organisation	Category
Forest Heath District Council*	A
St Edmundsbury District Council*	A

*These authorities were not included in the initial section 42 mailing. Once identified, these authorities were issued tailored letters (Appendix 19.17) containing the section 48 notice, and a USB stick with copies of the PEIR and all relevant consultation documents.²²

19.3.1.3. Section 44 persons (Land owners)

- 397. Under section 42 of the Act, the applicant is required to consult all those with an interest in land to which the application relates including (but not limited to) owners, lessees, tenants, occupiers and those able to sell or release the land.
- 398. Consultation with landowners has been ongoing throughout the development of the Norfolk Vanguard project, principally through Vattenfall’s land agent. The identification of potentially affected parties has been an on-going process since early 2016.
- 399. Survey access was sought for a range of option routes over a wide area through 2016 and 2017. Landowners and other interested parties were identified initially through title searches with the Land Registry. Where ownership could not be determined, site visits were conducted. The site visits involved identifying and visiting potential landowner residences and discussions with neighbours and other local residents to try and identify landowners. Contact was also made with landowners via telephone, email and letter.
- 400. The onshore cable route alignment was amended on a number of occasions prior to statutory consultation under the 2008 Act following requests from landowners. Where new land was included in the proposals further Land Registry searches were conducted followed by site visits and door knocking. Land referencing questionnaires were issued to all identified affected parties through 2017. An example of this questionnaire is included in Appendix 19.2. These were followed up with letters and site visits and discussions with landowners where possible to verify the ownership and interested party information. A copy of this letter is included in Appendix 19.3.
- 401. Where land owners remained unknown or where persons with rights of access over affected access ways were unknown, site notices were erected where possible in a

²² All three authorities confirmed that they had no consultation feedback to provide due to the distance of their authority from the proposed project. One further response was received from Breckland District Council on 13th June 2018. This is included in Appendix 25.17 and all points raised in that response will be taken into consideration.

suitable visible location (for example on gateways or nearby telegraph poles). A copy of a site notice is included in Appendix 19.4.

- 402. On 2nd October 2017 a Land Registry edition date check service was conducted to identify any changes in registered land ownership ahead of the formal consultation under section 44.
- 403. The combination of the above land referencing activities produced a list of interests for the initial round of statutory consultation under section 42 of the 2008 Act, which were issued on the 27th October 2017. This letter can be found in Appendix 19.5.
- 404. A follow-up letter was issued on the 14th November 2017 to all affected land interests identified to remind them of the consultation process and dates to respond by. This letter can also be found in Appendix 19.6.
- 405. Where further interested parties were subsequently identified by the Applicant they were provided with USBs and updated hard copy sets of plans and given an opportunity to put forward comments and requests in relation to the project proposals. These interested parties were given 28 days to respond from the date after they received the letter.
- 406. See Table 19.2 below for a summary of mailings to identified landowners during this period.

Table 19.2- Correspondence with landowners during statutory consultation period

Date of Consultation	Number of interests contacted
27 th October 2017 (alongside all other section 42 consultees)	347 land interests, utilities and mortgagees.
13 th November 2017	305 reminder letters to land interests.
18 th December 2017	4 further letters to newly identified land interests.

19.3.1.4. Part One Claimants (Category 3: section 44(4) and section 44(6)(b))

- 407. Based on the environmental information available at the point of statutory consultation (October 2017), and the position of the red line boundary at that point, it has been concluded that there would be no part 1 claims substantiated. Therefore, the Applicant did not include any parties in the scope for land referencing in this regard and in the formal section 42/44 consultation.
- 408. The noise and vibration chapter of the PEIR and consultation documents confirmed that:

At this stage, the assessment provides indicative information on the level of mitigation requirement (dBA) which would be required to be embedded into the

design of the onshore project substation and CRS at detailed design stage. Norfolk Vanguard Limited is committed to providing a final design of the project which is able to meet the rigorous standards of low noise emissions expected by both the UK regulatory bodies and stakeholders.

409. As a result of the confirmed mitigation measures that have been proposed to be put in place it was concluded that there will be no significant increase in noise levels perceived at any nearby residential receptors.
410. In relation to the other six physical factors under Part 1 (LCA 1973): Vibration, Artificial Lighting, Dust, Smoke, Fumes and Discharge of Liquids and Solids; it was concluded that no property will be able to substantiate a claim for a reduction in value in their property due to these other factors as a result of the project being operational.

19.3.1.5. Red line boundary changes, requiring additional consultation

411. Where significant changes in the onshore cable route red line boundary were made, further statutory consultation letters and accompanying plans were issued to those land interests whose land would be affected by the changes with a response period of at least 28 days (following the day on which the documents would have been received).
412. Five follow-up rounds of statutory consultation under the 2008 Act subsequent to that carried out in November to December 2017 have been undertaken for those with an interest in the land as the onshore development Order Limits have been amended as a result of information obtained and project refinements. The land interests consulted during the November to December 2017 consultation and the subsequent follow-up rounds of section 42 consultation are set out in Appendix 19.1.
413. On each follow-up round of section 42 consultation, only those parties who had not been previously identified, or those parties where a change in the project boundary resulted in an impact on their interest were contacted.
414. The dates of the initial and follow-up rounds of section 42 consultation for land interests and set out in Table 19.3 along with the number of interests contacted.

Table 19.3 Consultation with landowners

Date of Consultation	Number of interests contacted
7 th November to 11 th December 2017	347
8 th March 2018	19
8 th March 2018 (updates to previously consulted parties)	102
27 th April 2018 (section 42-44)	8 (new)

Date of Consultation	Number of interests contacted
27 th April 2018 (section 42-44)	55 (revised limits to previously consulted parties)
30 th April 2018 (section 42-44)	1 (ABP) ²³
9 th May 2018 (section 42-44)	1 (land interest who made contact)

415. Responses received from section 42 land interest consultees are set out in Chapters 22 and 23.
416. On the 8th March 2018 a further 19 letters were issued to affected parties who were not previously consulted in November 2017. These land interests arose from; changes to the red line boundary following formal consultation and impacting new land; changes in landownership; and new parties revealed through the land referencing process. These letters were accompanied by a full set of updated onshore land limit plans along with a deadline of the 7th April for responses to be submitted by. A copy of this letter can be seen at Appendix 19.7.
417. On the 8th March 2018 102 land interests who had previously been consulted under section 42) were also written to in order to inform them of changes on land in which they hold an interest which resulted in the red line moving outside of the previously consulted red line. The letters were accompanied by plans which highlighted the changes on their land. These land interests were also given until the 7th April 2018 to provide any relevant comments on the proposals. A copy of this letter can be seen at Appendix 19.8.
418. On the 23rd April 2018 an edition date check service with the land registry was ordered. This was to check the dates of all land registry titles along the proposed red line boundary to ensure any changes to ownership or other interests potentially affected by the proposals were identified and given the opportunity to be consulted.
419. Following the land registry edition date check, a further eight new parties were written to and provided with at least 28 days from the day after receipt of the letter to provide responses. A copy of the letter can be seen at Appendix 19.9.
420. As a result of a number of route changes and minor alterations requested by landowners to the red line boundary, all those affected by the changes (who had previously been consulted) were written to and provided with updated plans showing the red line boundary and the changes which had occurred on their land. The total number written to was 55 and a copy of the letter can be viewed at

²³ As a result of the red line boundary change, ABP's interest has been removed, and as such the organisation is no longer a section 44 consultee.

Appendix 19.10. These parties were also provided with at least 28 days to provide comments on the changes.

421. Two further consultation letters were issued. The first was sent to Associated British Ports on the 30th April 2018 due to their interest in an area of required offline highway improvement works in Kings Lynn port. A copy of this letter is at Appendix 19.11. Since this point however, following a further change to the red line boundary, ABP's interest has been removed and they are no longer a section 44 consultee. ABP was written to on the 23rd May to advise them of the removal.
422. The second letter was posted on the 9th May 2018 after a letter was received from a newly identified party who has access rights along one of the identified accesses. They had seen a site notice erected in this location due to the ownership of the track being unregistered. Although only a shared right of access is being sought over this track the applicant was keen to ensure they had received a formal consultation letter and a copy of this is at Appendix 19.12.

19.4. Notifying PINS under section 46

423. As required under section 46 of the 2008 Act, the Applicant complied with the duty to notify the Secretary of State of the proposed application. As is required under the Act, the Applicant supplied the Secretary of State (via the Planning inspectorate) with such information in relation to the proposed application as would be supplied to consultees for the purpose of complying with section 42. This was provided prior to commencing consultation under section 42.
424. The section 46 notification was issued by post to the Planning Inspectorate on 26th October 2017. A hard copy of the section 48 notice and a USB device containing the following information was enclosed with the letter:
- Preliminary Environmental Information Report (PEIR);
 - Non-Technical Summary of the PEIR;
 - Consultation Summary Document; and
 - Consultation Questionnaire.
425. A copy of the notification letter is included in Appendix 19.13. A copy of the acknowledgement of receipt from the Planning Inspectorate is included in Appendix 19.14.

19.5. Consultation undertaken in accordance with section 42 of the Act

426. As noted in Section 19.3, under section 42, applicants are required to consult with prescribed bodies, the Marine Management Organisation (MMO), each Local Authority that is within section 43, and each person who is within one or more of the categories set out in section 44 (landowners) for a period of at least 28 days after the day on which the documents are received.
427. Consultation under section 42 ran for 34 days from 7th November 2017 to 11th December 2017.²⁴
428. A letter was issued to all identified section 42 consultees on 27th October 2017 informing them of the consultation, the process for providing feedback and setting out the timetable for responses to be received by (as noted under section 45 of the 2008 Act). Details about how to obtain further information was also included.
429. A hard copy of the section 48 notice and a USB device containing the following information was enclosed with the letter:
- Preliminary Environmental Information Report (PEIR);
 - Non-Technical Summary of the PEIR;
 - Consultation Summary Document; and
 - Consultation Questionnaire.
430. A copy of the section 42 letter is included in Appendix 19.15. Documents including proof of postage and mailing receipts are included in Appendix 19.16.

19.5.1.1. PEIR

431. The PEIR was prepared for the purposes of presenting the likely on and offshore environmental effects of the proposed development based on the environmental and social data collated at the time as part of the EIA process. This was the principle source of information consulted upon under section 42 and formed the basis of all consultation materials and information.
432. The information contained within the PEIR, which had an accompanying Non-Technical Summary document, was issued to section 42 consultees to provide them with an opportunity to understand the likely environmental impacts of the project

²⁴ A number of section 42 consultees were identified subsequent to this mailing. These include a number of additional landowners (dealt with in Section 19.3.1.15), some additional commercial operators (see Section 19.5.1.3), and three additional section 43 local authorities (dealt with under Section 19.3.1.2). All subsequent consultees were provided with the relevant materials and afforded at least 28 days (from the day following receipt of the section 42 letter, PEIR documents and section 48 notice) to respond.

and provide feedback on these points. Copies of the PEIR chapters, the Non-Technical Summary Document and associated plans and accompanying information can be found on the project website www.vattenfall.co.uk/norfolkvanguard.

433. The PEIR contained information on the key topics outlined in the chapter list, below:

Table 19.4 PEIR chapters list

Chapter	Topic
Chapter 01	Introduction
Chapter 02	Need for the project
Chapter 03	Policy and Legislative Context
Chapter 04	Site Selection
Chapter 05	Project Description
Chapter 06	EIA Methodology
Chapter 07	Technical Consultation
Chapter 08	Marine Geology, Oceanography and Physical Processes
Chapter 09	Marine Water and Sediment Quality
Chapter 10	Benthic and Intertidal Ecology
Chapter 11	Fish and Shellfish Ecology
Chapter 12	Marine Mammals
Chapter 13	Offshore Ornithology
Chapter 14	Commercial Fisheries
Chapter 15	Shipping and Navigation
Chapter 16	Aviation and Radar
Chapter 17	Offshore and Intertidal Archaeology
Chapter 18	Infrastructure and Other Users
Chapter 19	Ground Conditions
Chapter 20	Water Resources and Flood Risk
Chapter 21	Land Use and Agriculture
Chapter 22	Onshore Ecology
Chapter 23	Onshore Ornithology
Chapter 24	Traffic and Transport

Chapter	Topic
Chapter 25	Noise and Vibration
Chapter 26	Air Quality
Chapter 27	Health Impact Assessment
Chapter 28	Onshore Archaeology
Chapter 29	Landscape and Visual Impact Assessment
Chapter 30	Tourism and Recreation
Chapter 31	Socio-Economics

19.5.1.2. Feedback mechanisms

434. The Applicant has had a range of feedback mechanisms available throughout the consultation and these were detailed in the section 42 notifications. Consultees were able to provide feedback in the following ways:

- In writing to ‘Norfolk Vanguard’, The Union Building 51-59 Rose lane, Norwich, NR1 1BY;
- Via the dedicated info@norfolkvanguard.co.uk email address; and
- Through completion of a consultation questionnaire available at public events, drop-in locations and also available for download online at www.vattenfall.co.uk/norfolkvanguard. An online version of the questionnaire was also available to fill out on the website and submit directly.

435. A dedicated information line (01603 567995) was also available throughout the consultation process for interested parties to seek clarification on the proposals.

19.5.1.3. Further consultation and extension of feedback deadline

436. Through the statutory consultation process a number of section 42 consultees were afforded additional time to make a representation on the project. Time extensions were afforded to a number of consultees either because the information issued did not arrive through the post, was delayed, or the USB device did not operate correctly. In all cases noted above, a new section 42 notification and USB device was issued, and confirmation of receipt provided by the consultee.

437. Table 19.5 below provides a summary of the consultees afforded additional time to make representations to the statutory consultation.

Table 19.5 List of section 42 consultees afforded additional time to provide feedback

Organisation	Feedback Deadline
Breckland District Council	14 th December 2017
Whale and Dolphin Society	25 th December 2018
British International Helicopters	5 th January 2018
Bristow Helicopters	5 th January 2018
Babcock International Helicopters	5 th January 2018
CHC Helicopters	5 th January 2018
Noordzee Helikopters Vlaanderen (NHV) Helicopters	5 th January 2018
Ministry of the Environment and Food of Denmark	8 th January 2018
Heli Holland	12 th January 2018 (Formal consultation request with links provided to PEIR and other documents, request for feedback by the 12 Jan 2018 (28 days allowance). (No Response Received.)
Shell Helicopters	16 th January 2018 (Formal consultation request with links provided to PEIR and other documents, request for feedback by the 16 Jan 2018 (28 days allowance). (No Response Received.)

438. In addition, following additional due diligence and further information coming to light following the original section 42 mailing, a number of additional section 42 ‘Commercial Operators’ were identified for the purposes of section 42 consultation. In order to comply with its obligations under section 42, the Applicant undertook additional consultation with these consultees.
439. In each case, a tailored letter was issued, which was based on the original section 42 notification, that explained about the project, why they are being consulted, how to respond to the consultation and the deadline for their responses. As with the original section 42 mailing, a hard copy of the section 48 notice and a USB device containing the following information was enclosed with the letter:
- Preliminary Environmental Information Report (PEIR);
 - Non-Technical Summary of the PEIR;
 - Consultation Summary Document; and
 - Consultation Questionnaire.

440. Consultees were provided with the same feedback mechanisms as noted in Section 19.5, above. They were afforded at least 28 days from the day following receipt of the letter to consider and respond to the proposals.

441. Table 19.6 shows the additional consultees identified.

Table 19.6 Additional section 42 consultees identified and consulted with

Organisation	Feedback Deadline
Oranje-Nassau B.V	15 th January 2018
Verus	20 th April 2018
Swift Exploration	24 th April 2018
Independent Oil and Gas	20 th April 2018

442. Copies of these letters are included in Appendix 19.17.

19.6. Meetings and engagement with EPP ETGs during section 42

443. There were minimal meetings and engagement with RPP ETGs during the formal consultation period in order to allow for adequate resource to be attributed to reviewing and responding on the PEIR and consultation documents. The following engagement took place. Further engagement, meetings and correspondence took place/was received following the close of statutory consultation and can be found in Chapter 25.

Table 19.7 Consultation under the EPP ETGs prior to S42 consultation

Date	Contact Type	Organisation	Topic
28 th November 2017	Email	To Historic England	Response to Historic England comments on the Offshore Archaeology Technical Report.
08 th December 2017	Marine mammal ETG meeting	Natural England The Wildlife Trust and Cefas	Marine mammal PEIR comments and approach to HRA.
8 th December 2017	Email	To Natural England	Request for feedback on key points in relation to the HRA.

19.7. Statement of Compliance

444. As required under section 42 of the 2008 Act, consultation was undertaken with prescribed consultees under the APFP Regulations, section 43 local authorities and all identified section 44 consultees. The Applicant also sought to obtain views of other organisations that were identified because of their knowledge of the local area or a specific environmental topic. This is set out below:

- A) All consultees were supplied with the consultation documents, namely the PEIR and supporting non-technical summary documents, a Consultation Summary Document and all relevant plans and a copy of the feedback questionnaire. A cover letter stated that the consultation process would run from 7th November 2017 to 11th December 2017. Consultees were given 34 days to make a representation.
 - B) The Applicant has had regard to all relevant responses to consultation (section 49).
 - C) The Applicant provided PINS with a copy of the same documentation that was sent to the section 42 consultees during each phase of consultation (section 46).
 - D) The Applicant also had regard to the DCLG Guidance on the pre-application process (section 50).
445. A full Statement of Compliance can be found in Chapter 27.

20.FORMAL CONSULTATION UNDER SECTION 47 OF THE 2008 ACT

20.1. Introduction

446. This Chapter of the Consultation Report sets out the activities undertaken by the Applicant to comply with its duty to consult under section 47 of the 2008 Act. It seeks to provide the information relevant to formal section 47 consultation as required in the Consultation Report under section 37(7)(a) of the 2008 Act and the relevant parts of DCLG guidance on pre-application consultation.
447. This Chapter concludes with a Statement of Compliance summarising the regard that the Applicant has had to relevant legislation and guidance in carrying out its duties under section 47.

20.2. Legislative context

448. Section 47(1) of the 2008 Act requires the applicant to prepare a Statement of Community Consultation (SoCC). The SoCC should set out how the applicant intends to consult the local community on the proposed application. There is a duty on the applicant to consult the relevant local authorities in respect of the content of the SoCC (section 47(2)) because their knowledge of the local area may influence decisions on the geographical extent of consultation and the methods that will be most effective in the local circumstances.
449. Local authority responses to consultation on the content of the SoCC should be requested by the applicant within a 28-day period (commencing on the day after the day on which the local authority receives the request for comments). Consultation documents must be provided to the local authority at this stage, providing information which allows the authority to make an informed response to the SoCC consultation (sections 47(3) and 47(4)). Section 47(5) of the 2008 Act requires the applicant to have regard to any response provided by the local authority that is received within the 28-day period.
450. In developing the SoCC, regard must be had to the EIA Regulations and relevant guidance about pre-application procedure. Regulation 10/12 of the EIA Regulations stipulates that the SoCC must set out whether the proposal is EIA development and, if so, how the applicant intends to publicise and consult on preliminary environmental information.
451. Guidance on developing and publishing the SoCC has been provided by DCLG and is summarised in the Statement of Compliance in Chapter 27 of this Report.
452. Once the SoCC has been finalised, notice of deposit must be published in a newspaper circulating in the vicinity of the proposed development site (section

47(6)(a) of the 2008 Act) and the applicant must carry out consultation in accordance with the proposals set out in the statement (section 47(7)).

20.3. Statement of Community Consultation (SoCC)

20.3.1.1. Development of the SoCC

453. In formulating the approach to statutory consultation and the Statement of Community Consultation, the Applicant worked with local authorities, having regard to guidance and advice, as well as reflecting with them on Phase I and II informal consultation.
454. DCLG guidance (paragraph 42) states that it may be helpful to make informal contact with the local authorities in advance of formal consultation on the content of the SoCC. Therefore, meetings were held between the Applicant and principal and strategic planning officers of local planning authorities (Norfolk County Council, North Norfolk District Council, Breckland District Council, Broadland District Council and Great Yarmouth Borough Council). Norfolk County Council also helped to arrange informal meetings with the county communications and engagement team, who provided valuable suggestions with respect to engaging with people whose voices are seldom heard in strategic consultations. An early draft of the SoCC was presented to these parties in July 2017, and the draft was discussed at a joint meeting.
455. Initially the draft SoCC maintained a consultation zone similar to the original onshore scoping area used earlier to communicate with residents during Phase I and II informal consultation. However, in light of the decision by the Applicant to opt for a landfall search area close to the southern margin of the scoping area, it was felt it would be appropriate to expand communications and actively invite participation from residents of parish councils adjacent to the revised landfall search area. Reflecting with the local authorities, it was agreed that while residents of broader areas around the landfall, cable relay station (if required) and project substation should be consulted with directly, there was no longer a need to continue so actively to encourage the participation of all people living within the original “scoping-area-shaped” consultation area. It was agreed in principle that a Primary Consultation Zone (PCZ), delineating an area 1 km around the project’s indicative cable corridor, where impacts could potentially be experienced during the construction phase, was appropriate.
456. This 1 km boundary was extended in certain areas to include the key market towns along the corridor, namely Aylsham, Reepham and Dereham, as hubs for more rural communities, and where during informal consultation there was a significant level of interest and response.

- 457. In addition, at key locations, where key permanent visible onshore infrastructure (i.e. close to the cable relay station (CRS) zone), the PCZ was extended to follow key parish and town council boundaries.
- 458. The fourth market town of the area, North Walsham, was also included within the PCZ.
- 459. The residents living within the PCZ were deemed to be those with the most likely chance of experiencing an impact as a result of the development of the project and so communication and engagement was prioritised, and undertaken directly, with these communities.
- 460. Outside of the PCZ information was provided, and engagement also undertaken, through less direct means such as via website updates, social media, local newspaper advertisement and consultation events in Norwich and Great Yarmouth.
- 461. Other informal advice was provided by the local authorities, included convening the drop-in exhibitions near the start of the statutory consultation period, in order to encourage early engagement with the consultation materials and with team members and help consultees make the most of the formal consultation period. Norfolk County Council lead communications and engagement officers also provided advice regarding engaging with the harder to reach and providing links to relevant organisations and groups. They also advertised the dates of the Norfolk Vanguard statutory consultation drop-in events in the NCC October 2017 e-newsletter, along with a link to the project website.

20.3.1.2. Formal consultation

- 462. The consultation approach set out in the draft SoCC was developed with the experiences and outcomes of the previous informal consultation exercises taken into account. It was designed with the specific detail of the proposals as a linear project with key areas of onshore infrastructure, as well as the relevant local communities and demographics in mind.
- 463. Due to the linear nature of this project, a number of local authorities are identified as requiring input and consultation on the development of the SoCC. These are listed below in Table 20.1.
- 464. The draft SoCC and a cover letter were issued to these authorities for comment on the 30th September 2017. A copy of the cover letter and draft SoCC can be found in Appendix 20.15.

Table 20.1 List of consultees provided with the draft SoCC for review during the statutory consultation period on the SOCC

Organisation	Date Draft SoCC Issued for comment	Feedback Deadline	Feedback Received
North Norfolk District Council	30th August 2017	27th September 2017 (extended to 6th October 2017)	29th September 2017
Broadland District Council	30th August 2017	27th September 2017 (extended to 6th October 2017)	3rd October 2017
Breckland District Council	30th August 2017	27th September 2017 (extended to 6th October 2017)	None received
The Broads Authority	30th August 2017	27th September 2017 (extended to 6th October 2017)	None received
Norfolk County Council	30th August 2017	27th September 2017 (extended to 6th October 2017)	18th September 2017
Marine Management Organisation (MMO) ²⁵	30th August 2017	27th September 2017 (extended to 6th October 2017)	28th September 2017
Norwich City Council	30th August 2017	27th September 2017 (extended to 6th October 2017)	None received
Great Yarmouth Borough Council ²¹	30th August 2017	27th September 2017 (extended to 6th October 2017)	4th October 2017

²⁵ Whilst the MMO and Great Yarmouth are not local authorities with whom the Applicant is required to consult formally on the draft SoCC, it was felt that it would be beneficial to seek additional feedback and issued a copy to these bodies in addition.

465. As is shown in Table 20.1 above, all required local authorities were provided with a copy of the draft SoCC on 27th September 2017 and given at least 28 days to respond.
466. The table below outlines the changes made to the SoCC following consultation with relevant local authorities.

Table 20.2 Feedback received to the draft SoCC and regard had by the Applicant

Organisation	Comment	Applicant Comment
<p>North Norfolk District Council</p>	<p>The District Council appreciates that the current consultation process relates to the proposed Norfolk Vanguard scheme.</p> <p>However, the Council is concerned that, with Vattenfall developing a second proposal, for Norfolk Boreas, which is likely to utilise the same landfall site and share a similar route for the onshore cables across the County, there is the potential for local communities near or along the route to be confused by the different statutory consultation timescales, such that they might not understand the scale of the combined proposals and the potential phasing and construction timescales, so as to meaningfully comment on the proposals. The District Council therefore believes that Vattenfall needs to make clearer the potential relationship between the two proposals and how any statutory consultation processes for the two projects will relate to each other or overlap, so that members of the public and local communities which might be impacted by the proposals are not in any way disadvantaged in being able to engage with the proposals at appropriate times.</p> <p>North Norfolk District Council recognises that the laying of onshore cables from the Norfolk Vanguard scheme across North Norfolk, from a proposed landfall location on the north Norfolk coast at Cart Gap, Happisburgh west to connect into the</p>	<p>Noted.</p> <p>This is noted and has been a key focus for the Applicant throughout the non-statutory consultation. Phase II informal consultation particularly drew the attention of participants to the fact that Norfolk Boreas would be subject to a separate DCO application – and the feedback received indicated that those who responded understood this. See Appendix 3.2 – Hearing Your Views II for further information. Section 5.1 of the SoCC specifically sets out the relationship between the Norfolk Vanguard and Norfolk Boreas project. This includes providing timescales for both projects and how people will be able to feed into development of both schemes.</p> <p>In all consultation materials, reference to the relationship with Norfolk Boreas is included. The consultation Summary Document contained information, including a timeline detailing how the Norfolk Boreas project relates to the Norfolk Vanguard project.</p> <p>Noted. The PEIR and Summary consultation Document as well as materials prepared to inform statutory consultation provide information helping people understand temporary impacts</p>

Organisation	Comment	Applicant Comment
	<p>National Grid infrastructure at Necton, will have an impact on local communities in the North Norfolk District.</p> <p>The Council will therefore wish to work closely with Vattenfall, as proposed routes for the cables and the siting of any onshore booster station connected with a High Voltage Alternating Current (HVAC) transmission system are considered over the coming months. This is to ensure that local communities within the Primary Consultation Zone are well informed of the proposals and have appropriate opportunities to comment on the detailed route arrangements, siting of any onshore cable relay station and how any construction programme will be managed, so as to minimise the impact of the proposals on local farming and tourism business operations, communities and the natural and historic environment.</p> <p>The District Council is therefore grateful for the opportunity to comment on the draft SoCC at this stage in the consultation process and makes a number of comments on the draft SoCC below:</p> <p>North Norfolk District Council appreciates that it is difficult to convey technical information regarding major developments, such as Norfolk Vanguard, to a lay audience. However, the key issues for the local community in North Norfolk and neighbouring districts, which will be affected by the onshore cable route and sub-station facilities, will be understanding how the onshore cable route and any onshore HVAC cable relay station facility will be identified and what any programme of construction will mean in terms of short and long-term impacts on their communities.</p>	<p>and embedded mitigation associated with cable corridor and construction activities. A landowner information pack has also been prepared and will be updated as more detailed information becomes available.</p> <p>The Applicant has sought to engage with North Norfolk District Council on an ongoing basis in order to achieve this aim.</p> <p>Noted.</p> <p>The Applicant has sought to provide all information in accessible formats throughout the consultation processes. A non-technical summary of the PEIR, as well as consultation summary documentation were produced for the statutory consultation period. The SoCC also detailed numerous methods of engagement and feedback, which were designed to make the information understandable, and as easy to respond to as possible.</p> <p>This is covered in Sections 8.2 and 8.3 of the SoCC. Section 8.3.1 of the SoCC details the specific elements that will be</p>

Organisation	Comment	Applicant Comment
	<p>These issues will be of much greater concern to local communities than issues related to the offshore development and the District Council is concerned that, as drafted, the SoCC isn't very clear as to the nature of the proposed onshore development so as to allow meaningful engagement with town and parish councils. The Council makes these observations as it believes that the public engagement meetings staged by Vattenfall in Happisburgh on the 18th July and in Ridlington on 24th August 2017 failed to provide the audiences at these meetings with clear details of the proposals, particularly around the issue of whether it would be possible for the Norfolk Vanguard scheme to utilise an HVDC transmission system, rather than an HVAC system, which the District Council understands would remove the need for an onshore cable relay station facility.</p> <p>In terms of making information about the Norfolk Vanguard scheme accessible to local communities, the District Council supports the operation of a dedicated website by the project, as well as the means of communication detailed at sections 8.2.4 and 8.2.5 of the draft SoCC document. The Council particularly</p>	<p>consulted upon, including setting out clearly the onshore development.</p> <p>The Applicant has taken on board feedback from previous stages of consultation and set out, in detail, the elements of the project upon which it is seeking feedback.</p> <p>Consultation materials included specific information regarding the HVAC versus HVDC decision (e.g. Page 16 Consultation Summary Document).</p> <p>Noted. The SoCC details all elements of the project (Onshore and Offshore) for which Norfolk Vanguard Limited is seeking a Development Consent Order. As noted above, engagement materials are tailored to different interests and needs, with a Consultation Summary Document and a PEIR Non-technical summary document prepared in order to help people engage with the project proposals, and provide valuable feedback, thereby helping to shape the final proposals to be submitted to the Planning Inspectorate.</p> <p>The meetings noted to the left were meetings organised or attended by the Applicant in addition to the core informal and formal consultation undertaken. The Applicant attended these meetings with the information available at that point in the process to discuss with local communities.</p> <p>Noted.</p> <p>The Applicant is aware of the high levels of public interest in the project. The Applicant receives many hundreds of e-mails from local residents and endeavours to provide new information when it</p>

Organisation	Comment	Applicant Comment
	<p>welcomes the widening of the Primary Consultation Zone around the landfall site at Happisburgh and the sites being considered for the onshore cable relay station at East Ruston and Ridlington, where there is a significant degree of public interest and concern regarding these proposed developments.</p> <p>The District Council notes the proposed programme of statutory consultation events to be staged during the consultation process for the Preliminary Environmental Information Report (PEIR) during November of this year and welcomes the fact that two events are to be staged in North Norfolk – one at Happisburgh and a second at North Walsham.</p> <p>Given that landfall for the scheme is proposed at Happisburgh, and that particular concerns exist regarding the possible development of an onshore cable relay station close to the landfall site, the District Council would ask that consideration is given by the project Team to staging the Happisburgh event towards the beginning of the consultation process. This would allow local residents and communities ample time to consider the information contained within the PEIR documentation, as the issues at this location where there is the potential for there to be long-term impacts through the construction of permanent installations are arguably different to the more short-term construction impacts of laying the cables along the cable corridor route.</p> <p>On a point of detail, North Norfolk District Council’s office opening hours as detailed on page 17 of the SoCC need amendment to read:</p> <p>Monday, Tuesday & Thursday from 8.30am to 5pm Wednesday from 10am* to 5pm Fridays from 8.30am to 4.30pm</p> <p>*The office is closed until 10am every Wednesday to visitors without prior appointments</p>	<p>is possible to do so. A Frequently Asked Questions (FAQ) document is updated regularly as project design assumptions are refined, aimed at responding to local interests. The FAQ document can be found in Appendix 4.2.</p> <p>The Happisburgh consultation event was arranged for the 11th November, 5 days after the start of the statutory consultation period, and allowing 29 days for the provision of feedback after attending.</p> <p>Noted – these timings were amended in the final SoCC.</p>

Organisation	Comment	Applicant Comment
Broadland District Council	<p>“I have had a brief look thorough the draft SOCC and am pleased that you will be holding consultation events in Aylsham and Reepham in due course, following our conversation I can confirm that the District Council has no objections to the proposed strategy for consultation.”</p>	Noted.
Norfolk County Council	<p>Paragraph 8.1 – reference to “Local and District Authorities” in the first bullet point on page 14 should be replaced for clarification purposes with “County and District Councils” and “Parish and Town Councils”.</p> <p>Paragraph 8.2.1 – this refers to the consultation dates on the Preliminary Environmental Impact Report (PEIR) being between 6 November 2017 – 11 December 2017. In recent discussion with Ruari Lean (Vattenfall), I had understood that the consultation period on the PEIR would be between 27 October 2017 to 4 December 2017. Please could you confirm when the section 42 consultation (under the Planning Act 2008) will take place on the PEIR.</p> <p>Paragraph 8.5 – local Information Points: While the County Council is happy to be an information point, I can confirm as previously discussed, that:</p> <p>(a) No documents can be kept in the County Council’s reception area. The County Council operates a clear desk policy so the Reception area is kept free of any documents and leaflets. We had previously put your leaflets out in Reception, but this is no longer possible.</p> <p>(b) There is very limited opportunity for any documents to be stored at County Hall.</p> <p>However, what we could potentially offer is:</p> <p>(a) Keep a single copy of the Non-Technical Summary (NTS) behind the Main Reception desk and if a member of the public asks for it we could let them read the document – this would need a label indicating that the</p>	<p>Noted – this wording was amended in the final SoCC.</p> <p>The formal consultation period took place between 7th November and 11th December 2017 – this is stated in the SoCC and all other consultation documents and advertisements. The PEIR was made available from the 27th October 2017, when the first local S48 notice was issued so interested parties could view the document in advance of the formal consultation period beginning if they wished.</p> <p>The County Council was removed from the list of advertised information points due to lack of capacity to store information. Instead an alternative location in Norwich was identified (Norwich Millennium Library). See Section 8.5 of the SoCC for a full list of information point venues.</p>

Organisation	Comment	Applicant Comment
	<p>document should not be removed (could we have 6 copies of the NTS labelled as above);</p> <p>(b) The County Council could hold a small box of electronic devices and further copies of the NTS provided this was no bigger than a box of A4 (maximum height 25 cm) – I would arrange with Main Reception for them to call me or the Team in the event that further information is requested from a Member of the Public.</p>	
<p>Marine Management Organisation (MMO)</p>	<p>The MMO notes that we would recommend consultation with the following fishing organisations, not listed on your list of organisational contacts, as they may be impacted by the proposed works:</p> <ul style="list-style-type: none"> • Anglia Fishermen's Association • North Norfolk Shell Fishermen's Association • Norfolk Independent Fisherman Association • North Norfolk & Wells Fishermen. <p>Conclusion</p> <p>The MMO agrees with the approach to community consultation outlined within the document and that, with the exception of the above missing organisations, the list of offshore contacts appears comprehensive.</p>	<p>The Applicant had regard to these comments and considered the addition of these organisations, however decided against including them in the PEIR distribution mailing due to the fact that they are not in the vicinity of the proposed development. The following organisations were however included in the consultation:</p> <ul style="list-style-type: none"> - North Norfolk Fishermen's Society - Caister Inshore Fishermen's Association - Nederlandse Visserbond - VisNED - NFFO - Eastern IFCA - Caister Fishermen - Great Yarmouth Fishermen - Happisburgh Fishermen - Lowestoft Fishermen - Sea Palling Fishermen
<p>Great Yarmouth Borough Council</p>	<p>Thank you for consulting Great Yarmouth Borough Council on the Statement of Community Consultation for the proposed Norfolk Vanguard Offshore Wind Farm.</p> <p>We are responding at an officer level, incorporating views from the Council's Strategic Planning and Economic Development departments. Although the onshore area of development is outside of the borough of Great Yarmouth, the borough is firmly at the centre of the European shipping and offshore energy</p>	<p>Noted.</p> <p>Noted.</p>

Organisation	Comment	Applicant Comment
	<p>industries and therefore we found it pertinent to respond at this stage.</p> <p>The town offers world class knowledge in the offshore industry including, but not limited to, ship building and repair expertise, a 24/7 port with deep water harbour, and expertise in diving and surveying. Great Yarmouth has also developed a highly skilled energy marine supply chain, that is both adaptable, innovative and in demand across the world. The port of Great Yarmouth is currently involved in the construction of two new windfarms, Galloper and East Anglia 1 and is the operations and maintenance base for the original offshore windfarm at Scroby Sands and Statoil’s new Dudgeon Windfarm. If you would like to find out more about Great Yarmouth’s experience and capabilities please visit www.great-yarmouth.biz.</p> <p>As a pro-active local authority, we have created a highly successful energy related Enterprise Zone with associated Business Rate Relief and a simplified planning environment which is geared towards capitalising on our unrivalled position as England’s offshore energy capital.</p> <p>We would like to propose that a consultation event is held at East Coast College who have, this summer, received £10m to allow for the creation of an Energy Skills Centre. This investment from New Anglia Local Enterprise Partnership’s ‘Growth Deal’ with the Government will ensure that the centre is open and operational by December 2018. The college’s stated aim for the Centre is to increase learner numbers across a range of skills with a focus on technical training to deliver a skilled workforce to the energy sector. This will not only place the college at the cutting edge of technical education nationally, but will create world class facilities for the region, supporting business and the fast-growing energy sector.</p> <p>One minor point regarding the SOCC under section 8.5 (page 17), please ensure that for the Great Yarmouth</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted. A consultation event was arranged for East Coast College. This was included in the finalised SoCC (Section 8.6)</p> <p>Noted – this point was updated in the final SoCC.</p>

Organisation	Comment	Applicant Comment
	Borough Council address, the number '31' is replaced by 'Town Hall'.	

20.3.1.3. The final SoCC

467. Following confirmation of receipt of the comments on the draft SoCC, a final version was agreed and prepared for publication.
468. The final SoCC can be seen in Appendix 20.1.

20.3.1.4. Publication

469. The final SoCC was published on 16th October 2017. An advert was placed in the Eastern Daily Press on the same date detailing where the SoCC could be viewed, in hard or soft copy. A copy of the advert can be viewed in Appendix 20.2. A copy of the adverts in situ can be found in Appendix 21.2.
470. Hard copies of the SoCC were placed on deposit and made available to view free of charge in the following locations:

Table 20.3 List of SoCC deposit locations

Date SoCC available	Location	Venue
16 th October 2017	Aylsham	Aylsham Library, 7 Hungate St, Aylsham, Norwich, NR11 6AA
16 th October 2017	Dereham	Dereham Library, 59 High St, Dereham, NR19 1DZ
16 th October 2017	Norwich	Norwich Millennium Library, The Forum, Millennium Plain, Norwich, NR2 1AW
16 th October 2017	Norwich	Norwich City Council, St Peters Street, Norwich, NR2 1NH
16 th October 2017	North Walsham	North Walsham Library, New Rd, North Walsham, NR28 9DE
16 th October 2017	Cromer	North Norfolk District Council, Council Offices, Holt Road, Cromer, NR27 9EN
16 th October 2017	Great Yarmouth	Broadland District Council, Thorpe Lodge, 1 Yarmouth Road, Norwich, NR7 0DU
16 th October 2017	Dereham	Breckland District Council, Elizabeth House, Walpole Loke, Dereham, Norfolk, NR19 1EE
16 th October 2017	Great Yarmouth	Great Yarmouth Borough Council, Town Hall, Hall Plain, Great Yarmouth, NR30 2QF

471. The SoCC was also made available to view and download on the project website (www.vattenfall.co.uk/norfolkvanguard) from 16th October 2017.
472. In addition, letters were issued to stakeholders and those with an interest in the proposals highlighting that the SoCC had been published and was available to view online or in hard copy. Appendix 20.3 contains a list of stakeholders issued this letter. Appendix 20.4 contains a copy of the letter, which was issued on 16th October 2017.
473. An eshot was also issued electronically to certain stakeholders on 16th October 2017. This eshot contained the same information as was contained in the letter. A copy of the eshot can be found in Appendix 20.5.
474. Tailored correspondence was also issued to identified harder to reach groups, organisations and representatives. This was to highlight the consultation, seek to engage with seldom heard individuals and groups, and encourage participation in the process. Further information about the harder to reach engagement can be found in Chapter 16. A copy of this example correspondence can be found in Appendix 20.6.
475. A newsletter was also issued to approximately 30,000 local residents living within the Primary Consultation Zone. The newsletter summarised the key information contained in the SoCC and provided an overview of the forthcoming statutory consultation. It contained the following information:
- Announcement of formal consultation period;
 - Update on the project (including timeline);
 - Information on what has changed and what is being consulted upon;
 - Information about Vattenfall;
 - Information about Vattenfall's wider activity in Norfolk; and
 - Details of the consultation process, information events, feedback mechanisms and contact details.
476. A copy of the newsletter was also issued alongside the letter to key stakeholders, including those that live outside of the PCZ. The newsletter was made available to download from the project website, alongside the final SoCC document. The newsletter is available to view in Appendix 20.7.
477. The project website was also updated with information about the SoCC, and to reflect the new information being presented with regard to the forthcoming

statutory consultation period. These changes were made to the project website on 16th October 2017.

478. The publication of the SoCC was also made clear on Vattenfall’s social media channels. The @VattenfallUK Twitter account tweeted that it was available to view at the above identified locations and included links to download a copy of the document from the project website.
479. A press release was issued on 13th October 2017 to highlight the publication of the SoCC. The press release resulted in coverage in Eastern Daily Press, Dereham Times, North Norfolk News and the Watton and Swaffham Times between 13th and 16th October 2017 (see Appendix 20.8).

20.4. Undertaking consultation

480. The Applicant used a wide variety of tools aimed at section 47 consultees to provide information about the proposals in an accessible way to encourage feedback. These tools included:
- Consultation Summary Document;
 - Questionnaire;
 - 3D interactive model;
 - Information leaflets on key topics;
 - Public exhibitions;
 - Website; and
 - Social media.

20.4.1.1. Consultation documents

481. As recommended in DCLG’s guidance ‘Planning Act 2008: Guidance on the pre-application process’, a ‘summary document’ written in non-technical language was produced to explain the proposals and the scope of consultation.
482. The Applicant therefore produced a ‘Consultation Summary Document’, which set out the key information about the project in an accessible way, as well as provided information about the consultation process and how to provide feedback on the proposals.

483. This document included the following information:
- Introduction;
 - About Vattenfall;
 - Why does the UK need offshore wind farms?;
 - Nationally Significant Infrastructure Projects & Consultation Overview;
 - Environmental Impact Assessment;
 - The Norfolk Vanguard Offshore Wind Farm Proposal;
 - Offshore Elements of the Proposal;
 - Onshore Elements of the Proposal;
 - Landfall;
 - Cable Relay Stations;
 - Underground Cable Corridor;
 - Onshore Project Substation;
 - Decommissioning;
 - Project Timeframe;
 - Local opportunities; and
 - How to Have Your Say.
484. This document was a central document for the statutory consultation period and was available at all key locations, including drop-in locations at local libraries alongside the PEIR (see Section 21.4), at all public exhibitions and also made available on the project website.
485. The Consultation Summary Document contained the same questions that were included on the feedback questionnaire (see section 19.4.3). The questions were included alongside the relevant information within the document. This was designed to help inform and signpost section 47 consultees to the correct information in order to ensure that they could provide informed feedback to each topical question.
486. A copy of the Consultation Summary Document can be seen in Appendix 20.9.

20.4.1.2. Public exhibitions

487. The Applicant sought to build upon the experiences of the informal consultation phases and held exhibitions in a range of accessible locations along the cable route corridor within the PCZ. Locations were sought in areas, communities or local rural ‘hubs’ that were most likely to be affected by the proposals.

488. The following table sets out the locations, timings and dates of the public exhibitions undertaken. Over the course of the consultation, 608 people attended the events.

Table 20.4 List of public exhibitions during the statutory consultation period

Date	Location	Exhibition Venue	Start Time	Close	Attendees
7 th November 2017	Dereham	Dereham Sixth Form College, Crown Rd, East Dereham NR20 4AG	1pm	7pm	67
8 th November 2017	Reepham	The Bircham Centre, Market Place, Reepham, NR10 4JJ	1pm	7pm	64
9 th November 2017	Aylsham	Aylsham Town Hall, Town Hall, Market Place, Aylsham, Norwich NR11 6EL	1pm	7pm	165
10 th November 2017	Necton	Necton Rural Community Centre, 13 Tun's Road, Necton, Swaffham, PE37 8EH	1pm	7pm	71
11 th November 2017	Happisburgh	The Wenn Evans Centre, Blacksmiths Ln, Happisburgh, Norwich NR12 0QY	11am	5.30pm	86
14 th November 2017	Norwich	University Technical College Norfolk, Oldhall Rd, Norwich NR4 6ES	2pm	7pm	67
15 th November 2017	Great Yarmouth	East Coast College, Gt. Yarmouth Campus, Suffolk Road, Gt. Yarmouth, NR31 0ED	1pm	7pm	39
16 th November 2017	North Walsham	North Walsham Community Centre, New Road, North Walsham, Norfolk, NR28 9DE	1pm	7pm	34

489. In addition to the above noted exhibitions, three ‘pop up’ events were held in public locations outside of the immediate vicinity of the cable route corridor and PCZ with the aim of reaching out to the wider community across Norfolk. Due to the nature of these events, only 15 people signed in, however the project team engaged with many more passers-by. These events are set out in the table below:

Table 20.5 List of statutory consultation ‘Pop Up’ events

Date	Location	Exhibition Venue	Start Time	Close
13 th November 2017	Norwich	The Forum, Millennium Plain, Norwich, NR2 1TF	9am	9pm
15 th November 2017	Great Yarmouth	Market Gates Shopping Centre, Great Yarmouth, NR30 2BG	9am	5.30pm
16 th November 2017	North Walsham	Market Place, North Walsham, NR28 9BP	8.45am	3.30pm

490. Information was displayed on twenty exhibition boards during these public events. The boards contained similar information as the Consultation Summary Document under the following board titles:

- Welcome;
- About Vattenfall;
- Why does the UK need offshore windfarms?;
- A Nationally Significant Infrastructure Project;
- Early Project Definition, Site Selection and Refinement;
- The Norfolk Vanguard Project Proposal;
- The Preliminary Environmental Information Report;
- Offshore Elements of the Proposal;
- Onshore Elements of the Proposal;
- Landfall;
- Cable Relay Station;
- The Underground Cable Corridor;
- The Onshore Project Substation;
- Project Timeframe;
- What kind of local opportunities and benefits are important to you?; and
- Thank you for coming today to find out more about the proposals for Norfolk Vanguard.

491. A copy of the exhibition boards can be found in Appendix 20.10.

20.4.1.3. Other consultation tools

Feedback form

492. In order to ensure that key stakeholders, local residents, other interested parties and attendees at the public exhibition events were able to provide feedback on the project, the Applicant designed a feedback form which covered the onshore and offshore elements of the project and allowed respondents to provide further information on issues which were not specifically addressed in the feedback form.
493. The feedback form was available at each of the exhibition events. Attendees were provided with the opportunity to complete the form on the day at the exhibition events, however where required, attendees were also provided with a freepost envelope in order to allow them to complete the form away from the event and return it to the project team free of charge.
494. In addition to the exhibition events, feedback forms were also made available at each of the project's designated 'information points'. These included:
- Aylsham Library;
 - Dereham Library;
 - Norwich Millennium Library;
 - Norwich City Council Offices;
 - North Walsham Library;
 - North Norfolk District Council Offices;
 - Broadland District Council Offices;
 - Breckland District Council Offices; and
 - Great Yarmouth Borough Council Offices.
495. Freepost envelopes were also available at each of the information points for interested parties to take away alongside a feedback form.
496. During the statutory consultation period the feedback form was also available on the dedicated project website. Interested parties were able to download the feedback form and return it the project team via the post or via email attachment.
497. In addition to the downloadable feedback form available on the project website, interested parties were also able to complete the feedback form online using the Survey Monkey platform during both the non-statutory and statutory consultation

phases. Interested parties were able to complete the feedback form online. The link to this online feedback form was available on the project website.

498. A copy of the feedback form used during the statutory consultation phase is available to view at Appendix 20.11.

3D model

499. In order to provide stakeholders, local residents, landowners and other interested parties with a clear visualisation of the project a 3D virtual model was created and was available to view during both the non-statutory and the Statutory phase of consultation.
500. The model was updated in between each of the phases of both informal and formal consultation and was available to view at the statutory consultation public exhibition events with a technical operator driving the programme to help consultees 'see' the view from points they requested. For technical reasons the 3D model could not be accessed for general viewing and use by the public.²⁶
501. In order to provide the relevant visual representations of the proposed infrastructure, photomontages were made available in consultation documentation contained on the website.
502. An interactive map was also published and made available on the project website.

Info sheets

503. Prior to the commencement of the statutory consultation phase in November 2017, dedicated Information sheets were created on a number of key topics, and sought to provide interested parties with further detail on key issues which had been raised during the previous phases of Non-Statutory consultation.
504. The topics covered by the information sheets included:
- Noise and vibration:
 - This information sheet contained information on the potential noise and vibration impact during both construction and operation, how

²⁶ The 3D interactive model covers an area of approximately 75x75km (5,625km²). It contains over 122,000,000 triangles and 1,109 individual textures. The size and complexity of the model means it needs a minimum of 6.5GB of graphics memory to run it. The PC required to run such a model is a dedicated graphics or gaming machine. The Applicant was advised that the average home PC or laptop has nowhere near the capacity to run such a model. Furthermore, while the model aims to be easy to use and navigate, it does require some computing dexterity. For these reasons, the model was not uploaded to the project website.

these potential impacts were being assessed and the data sources being used to assess the noise and vibration impacts.

- This information sheet also contained details of the potential cumulative effects of noise and vibration and the steps which would be taken to mitigate these impacts.
- Landscape and visual impact:
 - The landscape and visual impact information sheet also contained further details about the data sources that had been used to objectively assess the landscape and visual impact of the project.
 - In addition to this, the information sheet identified the potential landscape and visual impacts of the offshore elements of the project as well as the impact of the onshore project infrastructure both during construction and operation.
 - Further detail was also provided on the potential cumulative landscape and visual impacts of the project and the approach which has been taken to identifying the most effective methods of mitigating these impacts.
- Traffic and transport:
 - This information sheet provided further information on what had been assessed (including traffic flow data, collision data and existing pedestrian/cycle/bus routes among others), the potential traffic and transport impacts during both construction and operation.
 - The traffic and transport information sheet also provided further detail about the potential cumulative impact of the project's development alongside other planned schemes, as well as the mitigation measures which had been introduced in order to reduce the significance of transport and traffic impacts.

Plans and hard copies of the PEIR

505. Plans illustrating the project's onshore and offshore infrastructure, as well as the proposed cable route, were made available during the statutory consultation phase, as were copies of the PEIR document.
506. Hard copies of the PEIR document and indicative cable corridor plans were available at each of the public exhibition events held during the statutory consultation phase.
507. In addition to this, hard copies of the PEIR were available to view at:
- Dereham Library; and
 - North Walsham Library.
508. The Applicant also provided a copy of plans and the PEIR document free of charge on a USB device. These devices were available at each of the information points during the statutory consultation phase, including:
- Aylsham Library;
 - Dereham Library;
 - Norwich Millennium Library;
 - Norwich City Council Offices;
 - North Walsham Library;
 - North Norfolk District Council Offices;
 - Broadland District Council Offices;
 - Breckland District Council Offices; and
 - Great Yarmouth Borough Council Offices.
509. Electronic copies of the PEIR were also available to view or download from the project website.
510. The Applicant also made hard copies available to interested parties, to be provided upon request, at a cost of:
- Full Preliminary Environmental Information Report with annexes – £1,038; and
 - A set of 18 (A4) Indicative Cable Corridor Plans – £15.

Non-Technical Summary of the PEIR

511. The Non-Technical Summary of the PEIR sought to provide an overview of the environmental impacts of the project in non-technical terms.
512. The Applicant provided copies of the Non-Technical Summary document for reference at each of the information points outlined below. Copies of the Non-Technical summary were also available to take away free of charge on a USB device. These devices were available at each of the information points during the statutory consultation phase, including:
- Aylsham Library;
 - Dereham Library;
 - Norwich Millennium Library;
 - Norwich City Council Offices;
 - North Walsham Library;
 - North Norfolk District Council Offices;
 - Broadland District Council Offices;
 - Breckland District Council Offices; and
 - Great Yarmouth Borough Council Offices.
513. Electronic copies of the Non-Technical Summary were also available to view or download from the project website.
514. The Applicant also made hard copies available to interested parties to be provided upon request at a cost of:
- Non-Technical Summary of Preliminary Environmental Information – £22.

Slide pack

515. The Applicant also created an adaptable slide pack which was used during presentations to local town and parish councils who were interested in hosting a session to discuss the project. Slide pack examples can be found in Appendix 25.16.
516. The slide pack contained information on the following topics:
- Vattenfall in Norfolk;
 - Project description;

- Consultation process;
- Responding to topics consultees have highlighted as being of interest (e.g. environmental research, innovation, etc);
- Opportunities and sponsorship;
- Skills, jobs and training; and
- Timeline and next steps.

Social media

517. During the formal consultation period, focus of social media activity narrowed and the majority of content shared under the dedicated project hashtag related directly to the consultation process with emphasis being on provision of detailed information and facilitating receipt of feedback from anyone who wanted to give it, regardless of level of previous engagement with the project or ability to attend events in person. Social media activity focused on the following:

- Re-emphasising nature and purpose of consultation, including process and deadlines;
- Publishing the digital Statement of Community Consultation (SoCC) and ensuring that interested parties were aware of availability both online and in hard copy;
- Repeatedly sharing details of the public exhibitions (dates, times, locations);
- Giving interested parties an idea of what to expect from the events – the type of information presented, illustrative tools, availability of key project staff at events, material to take away;
- Providing information about the NSIP/6 stage planning process to give context and background to the various consultation documents and activities undertaken;
- Publishing the digital Preliminary Environmental Information Report (PEIR) and ensuring that interested parties were aware of availability both online and for review in hard copy at various local community/public buildings in consultation area;
- Providing details of the various ways in which feedback could be given and received on the project proposals, including links to online feedback questionnaires; and

- Sharing links to information sheets giving further information on key project issues such as Landscape & Visual Impact Assessment (LVIA), noise and vibration, traffic and transport.

Facebook adverts

518. Several paid Facebook adverts were used during both informal consultation phases and also the formal consultation period, with the following aims:
- Using Facebook advertising capability to achieve greater ‘reach’/wider dissemination of project proposals and consultation information in the Norfolk communities most impacted by the project and associated onshore infrastructure;
 - Using Facebook to enhance and improve on the ability to communicate with ‘harder to reach’ groups or those less likely to engage with or participate in the planning process; and
 - Using adverts to put project consultation information before the eyes of people who may be most comfortable with digital communication and are therefore most likely to provide digital feedback.
519. Analytics from project Facebook advertising suggests a greater level of subject engagement with the teenagers (13-18 years), young adults (18-25 years), older age groups (65+) and females than was experienced with other methods of project communication. This type of use of modern, mobile communication therefore helps to broaden engagement with those whose voices are less often heard, by raising awareness of opportunities to engage and alerting them to digital channels (e.g. on-line consultation materials and surveys), which might suit their circumstances and better enable participation than more traditional methods.

20.5. Feedback mechanisms

520. The Applicant has had a range of feedback mechanisms available throughout the consultation and these were detailed in the section 42 notifications and section 47 consultation materials. Consultees were able to provide feedback in the following ways:
- In writing to ‘Norfolk Vanguard’, The Union Building 51-59 Rose lane, Norwich, NR1 1BY;
 - Via the dedicated info@norfolkvanguard.co.uk email address; and
 - Through completion of a consultation questionnaire available at public events, drop-in locations and also available for download online at

www.vattenfall.co.uk/norfolkvanguard. An online version of the questionnaire was also available to fill out on the website and submit directly.

521. A dedicated information line (01603 567995) was also available throughout the consultation process for interested parties to seek clarification on the proposals.

20.6. Engagement with harder to reach groups and individuals

522. In conjunction with the above noted focus on general engagement with seldom heard and hard to reach groups, the Applicant undertook to encourage as wide a response to its formal consultation as possible.

523. An approach to hard to reach engagement was developed over time and led by the LLO addition to the ongoing wider engagement that was being undertaken across the region.

524. Reference to engagement and consultation with hard to reach groups was included within the SoCC and discussed with relevant local authorities (see Chapter 20 for further information).

525. Throughout the formal consultation, the Applicant offered presentations and provided information directly to such groups in order to facilitate their participation in the consultation process.

526. Engagement was undertaken with contacts and representatives of hard to reach or 'seldom heard' groups during October 2017 in order to notify them of the statutory consultation. This engagement encouraged them to further disseminate this information within their community and existing networks, and offered to present the proposals directly to groups or individuals. A copy of an example correspondence can be found in Appendix 20.6. Slide packs were also utilised (see Appendix 25.16).

527. The following methods were also used to inform local communities, including 'hard to reach groups of the opportunities to get involved with the consultation on the project:

- Newsletter within the Norfolk Vanguard Primary Consultation Zone;
- Newspaper adverts;
- Local posters, along the refined cable corridor;
- Press releases to local media;
- Letters to elected representatives, parish councils and local groups;

- Posts on social media; and
- Local e-newsletter to those who have registered their interest in the project.

528. In addition to this activity, and part of existing ongoing engagement with local education providers, a questionnaire was developed for younger people in order to facilitate feedback and project understanding from a group that is seldom engaged with in relation to this sort of consultation.

529. Workshops and engagement activity were held with Colby Primary School, and children completed the revised questionnaire. The questionnaire can be found in Appendix 20.12.

20.7. Following formal consultation

530. Following the statutory consultation period, the Applicant produced an interim consultation report 'Hearing Your Views III'. This report recorded all activity and provided analysis of all responses received to the formal consultation. A copy of this report can be found in Appendix 3.3.

531. The 'Hearing Your Views III' report was published on 23rd February 2018, and was uploaded to the project website.

532. The report was sent directly to a number of key stakeholders following publication. An accompanying covering letter can be found in Appendix 20.13.

533. A newsletter was also produced which summarised the consultation undertaken, the key issues raised, and the Applicant's response to these issues. This newsletter was issued to all those that received the previous newsletter in the PCZ and was uploaded to the project website. A copy of this newsletter can be found in Appendix 20.14. Further information regarding post statutory engagement can be found in Chapter 25.

534. Social media continues to be the day-to-day means of sharing informal project updates and also works in a supporting role on more comprehensive and formal news announcements, with examples such as:

- Using infographics and video clips to help provide illustrative context to key project design decisions;
- Announcing updates and providing links to the onshore cable route interactive map;
- Giving links to info on existing web pages when appropriate and directing those with detailed questions to the appropriate info@norfolkvanguard email address;
- Sharing details of project team attendance at local events;

- Publishing digital version of the project newsletter; and
- Facilitating engagement with local and regional supply chain; providing registration links and information on opportunities.

535. The Applicant will continue to use Twitter and Facebook as a means of keeping existing and new followers and audiences informed of project updates and to highlight any future calls to action, as outlined above.

20.8. Statement of Compliance

536. An account of how the requirements of the 2008 Act and the EIA Regulations have been complied with in terms of undertaking the section 47 consultation is set out in this Chapter and the Statement of Compliance (Chapter 27).

537. This Chapter demonstrates that consultation was carried out in line with the SoCC. In summary, The Applicant complied with the Act and EIA regulations as follows:

- a) A draft SoCC was prepared, which set out how the Applicant proposed to consult the community and consulted upon with the relevant authorities in whose area the proposed project lies (section 47(2)).
- b) Statutory consultation with the relevant local authorities on the SoCC ran from 30th August 2017 until 6th October 2017 thus allowing a period greater than 28 days for responses (section 47(3)).
- c) A roundtable meeting was held with relevant authorities prior to this point to discuss the contents of the SoCC. This took place on 19th July 2017.
- d) The Applicant considered all relevant comments received on the draft SoCC and draft Update to the SoCC (section 47(5)).
- e) Notice of the SoCC was published in local newspapers on 16th October 2017.
- f) The SoCC and Update to the SoCC were also made available on the Applicant's project website (section 47(6)).
- g) The consultation process was carried out in accordance with the SoCC (save for as in Section 20.4.1.3 regarding the 3D model placement on the project website) as explained in Chapter 20.3 of this report (section 47(7)).

538. A full Statement of Compliance can be found in Chapter 27.

21.FORMAL PUBLICITY UNDER SECTION 48 OF THE 2008 ACT

21.1. Introduction

539. This Chapter of the Consultation Report sets out the activities undertaken by the Applicant to comply with its duty to publicise the proposed application under section 48 of the 2008 Act. It seeks to provide the information relevant to section 48 publicity as required in the Consultation Report under section 37(7)(a) of the 2008 Act and the relevant parts of the DCLG guidance on pre-application consultation.
540. The Chapter concludes with a Statement of Compliance summarising the regard that the Applicant has had to relevant legislation and guidance in carrying out its duties under section 48.

21.2. Legislative context

541. Section 48(1) of the 2008 Act requires the applicant to publicise a proposed application at the pre-application stage. Regulation 4 of the APFP Regulations prescribes the manner in which an applicant must undertake this publicity. Regulation 4(2) sets out what the publicity must entail, including the publishing by the applicant of a notice, and Regulation 4(3) provides detail of the matters which must be included in that notice.
542. In developing and publishing the notice, regard must be had to the EIA Regulations and relevant guidance about pre-application procedure. Regulation 13 of the 2017 EIA Regulations stipulates that, where the application for development consent is an application for EIA development, the applicant must at the same time as publishing the notice of the proposed application under section 48(1), send a copy of the notice to the consultation bodies and to any person notified to the applicant by PINS in accordance with Regulation 11 of the 2017 EIA Regulations.
543. Guidance provided by DCLG pertinent to section 48 states that this publicity is an integral part of the public consultation process. Where possible, the first of the two required local newspaper advertisements should coincide approximately with the beginning of the consultation with communities (paragraph 58).

21.3. The section 48 notice

21.3.1.1. Development of the notice

544. The section 48 notice was prepared with reference to the above legislation and guidance. A copy of the wording of the final notice is provided in Appendix 21.1.

545. The Statement of Compliance in Chapter 27 sets out the matters which must be included in the notice (from Regulation 4(3) of the APFP Regulations) and provides references to where this information can be found in the final notice.

21.3.1.2. Timing of publication

546. As noted above, guidance on pre-application consultation notes that section 48 publicity is an integral part of both section 42 and 47 consultation. This fed directly into the overall approach to pre-application consultation for the project.

547. Publicity under section 48 occurred in parallel to formal consultation under section 42 and section 47 (stage 2) of the 2008 Act. The deadline for the receipt of views on the Application was the 11th December 2017, which was consistent across sections 42 and 47 consultation and section 48 publicity.

21.3.1.3. Publicising the notice

548. The applicant must publish a notice, which must include the matters prescribed by paragraph (3) of Regulation 4 of the APFP Regulations, of the proposed application:

- for at least two successive weeks in one or more local newspapers circulating in the vicinity in which the proposed development would be situated;
- once in a national newspaper;
- once in the London Gazette and, if land in Scotland is affected, the Edinburgh Gazette; and
- where the proposed application relates to offshore development –
 - i. once in the Lloyd’s List; and
 - ii. once in an appropriate fishing trade journal.

549. The following table sets out the publications and dates that notifications were published. Copies of the published notifications from each are included in Appendix 21.2.

Table 21.1 List of section 48 notice publications and dates

Date	Publication
30 th October 2017	The Times
30 th October 2017	The London Gazette
30 th October 2017	Lloyds List
1 st November 2017	Fishing News
30 th October 2017 and 6 th November 2017	Eastern Daily Press

21.4. Consultation material

550. As set out in the SoCC, copies of the consultation materials were placed on deposit for public viewing free of charge in the following locations:

Table 21.2 List of consultation materials deposit locations during statutory consultation

Date SoCC available	Location	Venue
30 th October 2017	Aylsham	Aylsham Library, 7 Hungate St, Aylsham, Norwich, NR11 6AA.
30 th October 2017	Dereham	Dereham Library, 59 High St, Dereham, NR19 1DZ.
30 th October 2017	Norwich	Norwich Millennium Library, The Forum, Millennium Plain, Norwich, NR2 1AW.
30 th October 2017	Norwich	Norwich City Council, St Peters Street, Norwich, NR2 1NH.
30 th October 2017	North Walsham	North Walsham Library, New Rd, North Walsham, NR28 9DE.
30 th October 2017	Cromer	North Norfolk District Council, Council Offices, Holt Road, Cromer, NR27 9EN.
30 th October 2017	Great Yarmouth	Broadland District Council, Thorpe Lodge, 1 Yarmouth Road, Norwich, NR7 0DU.
30 th October 2017	Dereham	Breckland District Council, Elizabeth House, Walpole Loke, Dereham, Norfolk, NR19 1EE.
30 th October 2017	Great Yarmouth	Great Yarmouth Borough Council, Town Hall, Hall Plain, Great Yarmouth, NR30 2QF.

551. At each location, the following materials were available:

- The PEIR on USB stick (Hard copies of the full PEIR were available to view at Dereham and North Walsham Libraries);
- PEIR Non-Technical Summary document;
- Consultation Summary Document; and
- Questionnaires.

552. The section 48 notice was included in the mailing to section 42 consultees, which was issued on 27th October 2017. A copy of the notice can be found in Appendix 21.1, and the accompanying covering letter can be seen in Appendix 19.15.

21.5. Statement of Compliance

553. As required under section 48 of the 2008 Act, the Application was publicised to seek views from the general public on the project. The Applicant complied with the relevant legislation as follows:

- a) The Applicant prepared and published section 48 Notices for the statutory consultation in the manner prescribed under the APFP Regulations (section 48(1)).
 - b) The formal period for responses was included in the section 48 Notices as 7th November 2017 and 11th December 2017 (allowing 34 days to respond, more than the minimum of 28 days (after receipt) required under section 48(2)).
 - c) The Applicant published the section 48 Notices as required by Regulation 4(2) of the APFP Regulations.
 - d) The statutory consultees were supplied with a copy of the section 48 notice in accordance with Regulation 9(1)(c) and Regulation 11 of the 2009 EIA Regulations (now Regulation 11(1)(c) and Regulation 13 of the 2017 EIA Regulations). A copy of the section 48 Notice was enclosed within letters sent to statutory consultees.
554. Publicity under section 48 occurred in parallel to formal consultation under section 42 and section 47. The requirements under the Act are for the Applicant to have regard to the responses in developing the proposed application (section 49). No responses were received specifically in relation to the section 48 Notice but where it has been identified through feedback form analysis that respondents have heard about the consultation from newspapers (which could have included the section 48 notices), this has been acknowledged in the relevant section.
555. A full Statement of Compliance can be found in Chapter 27.

22. SUMMARY OF RESPONSES UNDER SECTION 42 OF THE 2008 ACT

22.1. Introduction

556. This Chapter of the Consultation Report sets out how the Applicant has complied with its duty under section 49 of the 2008 Act to take account of consultation responses received under section 42 of the 2008 Act. Information pertaining to consultation responses received under sections 47 and 48 of the 2008 Act is presented in Chapters 23 and 24 of this Report respectively.

557. This Chapter seeks to provide the information relevant to section 42 consultation responses as required in the Consultation Report under sections 37(7)(b) and 37(7)(c) of the 2008 Act and the relevant parts of the DCLG guidance on pre-application consultation, which are as follows:

- **2008 Act**

Section 37(7) states that the Consultation Report should, inter alia, give details of:

- Relevant responses to the formal consultation and publicity under sections 42, 47 and 48 of the 2008 Act; and
- The account taken of any relevant responses.

- **DCLG Guidance on pre-application consultation**

Paragraph 80 states that the Consultation Report should, among other things:

- Set out a summary of relevant responses to consultation (but not a complete list of responses);
- Provide a description of how the application was influenced by those responses, outlining any changes made as a result and showing how significant relevant responses will be addressed; and
- Provide an explanation as to why any significant relevant responses were not followed, including advice on impacts from a statutory consultee.

22.2. Legislative context

558. Section 49(2) of the 2008 Act requires the applicant to have regard to relevant responses to the consultation and publicity that has been undertaken under sections 42, 47 and 48. A relevant response for the purposes of section 42 is defined in section 49(3)(a) as a response from a person consulted under section 42 that is received by the applicant before the deadline imposed.

22.3. Summary of responses received

559. Over 70 individuals or representatives from various organisations provided a response to the section 42 consultation. A list of all respondents and a summary of

their feedback to section 42 consultation is provided in Appendix 22.1 and a summary is provided below.

560. Where responses relate to the EIA, these are outlined in the relevant technical chapters (Chapters 8 to 31) of the Norfolk Vanguard ES, Volume 1. Within section 3 of each ES chapter, detail is provided on where the comment has been addressed within the ES or other submission documents.
561. It is worth noting that a number of non-prescribed bodies have been included in the analysis of the section 42 responses from prescribed bodies and dealt with directly in the ES Chapters. This is due to the nature of the feedback provided and the technical assessment undertaken on information submitted in relation to sensitive issues. These respondents include:
- Necton Substation Action Group (NSAG);
 - No 2 Relay Stations (N2RS); and
 - St Peter’s Church Ridlington.
562. Some of the section 42 consultees in addition to writing about EIA topics also made comment on the EIA process, notably consultation and the pre-application process. This, therefore, has been included in this report, below, alongside the other EIA topics covered in the ES.

22.3.1.1. Consultation process

563. The following Prescribed bodies provided comments in relation to the consultation process:
- NSAG;
 - N2RS;
 - Necton Parish Council;
 - North Norfolk District Council;
 - St Peter’s Church Ridlington;
 - Witton & Ridlington Parish Council;
 - Natural England;
 - NFU;
 - Eastern Inshore Fisheries Conservation Authority;
 - CPRE; and
 - Oulton Parish Council.

564. Responses to this issue are detailed in the full list of responses and the description of regard had by the Applicant in Appendix 22.1 and also response to the feedback received under section 47 in Chapter 23.

22.3.1.2. Marine geology, oceanography and physical processes

565. The following Prescribed bodies provided comments in relation to marine geology, oceanography and physical processes:

- Happisburgh Parish Council;
- North Norfolk District Council;
- Environment Agency;
- Historic England; and
- Marine Management Organisation (MMO).

566. Responses are detailed in Chapter 8 of the ES.

22.3.1.3. Marine water and sediment quality

567. The following Prescribed bodies provided comments in relation to marine water and sediment quality:

- Environment Agency.

568. Responses are detailed in Chapter 9 of the ES.

22.3.1.4. Benthic and intertidal ecology

569. The following Prescribed bodies provided comments in relation to benthic and intertidal ecology:

- Natural England;
- The Wildlife Trusts;
- Eastern IFCA;
- Environment Agency; and
- MMO.

570. Responses are detailed in Chapter 10 of the ES.

22.3.1.5. Fish and shellfish ecology

571. The following Prescribed bodies provided comments in relation to fish and shellfish ecology:

- Eastern IFCA;
- Environment Agency;
- MMO; and
- National Federation of Fishermen's Organisations.

572. Responses are detailed in Chapter 11 of the ES.

22.3.1.6. **Marine mammals**

573. The following Prescribed bodies provided comments in relation to marine mammals:

- Natural England;
- The Wildlife Trusts;
- Eastern IFCA;
- Ministry of Infrastructure and Water Management Netherlands;
- MMO; and
- Ministry for the Environment, France.

574. Responses are detailed in Chapter 12 of the ES.

22.3.1.7. **Offshore ornithology**

575. The following Prescribed bodies provided comments in relation to offshore ornithology:

- Natural England;
- RSPB;
- Ministry of Infrastructure and Water Management Netherlands; and
- Ministry for the Environment, France.

576. Responses are detailed in Chapter 13 of the ES.

22.3.1.8. **Commercial fisheries**

577. The following Prescribed bodies provided comments in relation to commercial fisheries:

- Norfolk County Council;
- Suffolk County Council;
- Eastern IFCA;
- MMO;
- National Federation of Fishermen's Organisations;
- Ministry for the Environment, France; and
- Individual fishermen.

578. Responses are detailed in Chapter 14 of the ES.

22.3.1.9. **Shipping and navigation**

579. The following Prescribed bodies provided comments in relation to shipping and navigation:

- Cruising Association;
- RYA;
- Suffolk County Council;

- Ministry of Infrastructure and Water Management Netherlands;
- MMO;
- National Federation of Fishermen's Organisations; and
- Maritime and Coastguard Agency.

580. Responses are detailed in Chapter 15 of the ES.

22.3.1.10. Aviation and radar

581. The following Prescribed bodies provided comments in relation to aviation and radar:

- NATS;
- Bristow Helicopters;
- Ministry of Defence; and
- Maritime and Coastguard Agency.

582. Responses are detailed in Chapter 16 of the ES.

22.3.1.11. Offshore and intertidal archaeology and cultural heritage

583. The following Prescribed bodies provided comments in relation to offshore and intertidal archaeology and cultural heritage:

- Historic England; and
- MMO.

584. Responses are detailed in Chapter 17 of the ES.

22.3.1.12. Infrastructure and other users

585. The following Prescribed bodies provided comments in relation to infrastructure and other users:

- British Marine Aggregate Producers Association;
- ENI;
- RYA;
- Sheringham Shoal (Scira Offshore Energy Ltd);
- Tampnet;
- Ministry of Defence;
- MMO;
- BBL Company;
- Coal Authority; and
- Independent Oil & Gas.

586. Responses are detailed in Chapter 18 of the ES.

22.3.1.13. [Ground conditions and Contamination](#)

587. The following Prescribed bodies provided comments in relation to ground conditions and contamination:

- Campaign to Protect Rural England (CPRE);
- Norfolk County Council;
- Environment Agency; and
- National Farmers Union.

588. Responses are detailed in Chapter 19 of the ES.

22.3.1.14. [Water resources and flood risk](#)

589. The following Prescribed bodies provided comments in relation to water resources and flood risk:

- CPRE;
- Natural England;
- Necton Parish Council;
- Norfolk County Council;
- Norfolk Rivers Trust;
- Necton Substation Action Group (NSAG);
- Ørsted;
- Suffield Parish Council;
- Environment Agency;
- Breckland;
- Norfolk Rivers Internal Drainage Board (IDB)/Water Management Alliance; and
- Anglian Water.

590. Responses are detailed in Chapter 20 of the ES.

22.3.1.15. [Land use and agriculture](#)

591. The following Prescribed bodies provided comments in relation to land use and agriculture:

- East Ruston Parish Council and residents;
- Cadent Gas Ltd;
- Coal Authority;
- CPRE;
- Dereham Town Council;
- ESP Utilities Group;
- Happisburgh Parish Council;
- Norfolk County Council;

- North Norfolk District Council;
- Oulton Parish Council;
- Suffield Parish Council;
- Health and Safety Executive;
- National Grid;
- Network Rail;
- Royal Mail;
- National Farmers Union;
- Anglian Water;
- Colby and Banningham Parish Council; and
- Costessy Town Council.

592. Responses are detailed in Chapter 21 of the ES.

22.3.1.16. Onshore ecology

593. The following Prescribed bodies provided comments in relation to onshore ecology:

- East Ruston Parish Council;
- CPRE;
- No to Relay Station (N2RS) group;
- Natural England;
- North Norfolk District Council;
- Ørsted;
- St Peters Ridlington;
- The Wildlife Trusts;
- Environment Agency;
- Breckland District Council; and
- Colby and Banningham Parish Council.

594. Responses are detailed in Chapter 22 of the ES.

22.3.1.17. Onshore ornithology

595. The following Prescribed bodies provided comments in relation to onshore ornithology:

- East Ruston Parish Council;
- RSPB; and
- Colby and Banningham Parish Council.

596. Responses are detailed in Chapter 23 of the ES.

22.3.1.18. Traffic and transport

597. The following Prescribed bodies provided comments in relation to traffic and transport:

- East Ruston Parish Council;
- Highways England;
- N2RS;
- Necton Parish Council;
- Norfolk County Council;
- North Norfolk District Council;
- Oulton Parish Council;
- Public Health England;
- Suffield Parish Council;
- Breckland District Council;
- Royal Mail;
- Colby and Banningham Parish Council; and
- Aylsham Town Council.

598. Responses are detailed in Chapter 24 of the ES.

22.3.1.19. Noise and vibration

599. The following Prescribed bodies provided comments in relation to noise and vibration:

- East Ruston Parish Council;
- N2RS;
- Necton Parish Council;
- North Norfolk District Council;
- NSAG;
- Ørsted;
- Breckland District Council;
- Broadland District Council; and
- Colby and Banningham Parish Council.

600. Responses are detailed in Chapter 25 of the ES.

22.3.1.20. Air quality

601. The following Prescribed bodies provided comments in relation to Air Quality:

- Public Health England;
- Breckland; and
- Colby and Banningham Parish Council.

602. Responses are detailed in Chapter 26 of the ES.

22.3.1.21. [Health impact assessment](#)

603. The following Prescribed bodies provided comments in relation to health impact assessment:

- East Ruston Parish Council;
- Happisburgh Parish Council;
- N2RS;
- NHS England;
- NSAG;
- Oulton Parish Council;
- Public Health England;
- Health and Safety Executive; and
- Colby and Banningham Parish Council.

604. Responses are detailed in Chapter 27 of the ES.

22.3.1.22. [Onshore archaeology and cultural heritage](#)

605. The following Prescribed bodies provided comments in relation to onshore archaeology and cultural heritage:

- N2RS;
- Necton Parish Council;
- Norfolk County Council;
- North Norfolk District Council;
- St Peters Ridlington;
- Historic England;
- National Trust; and
- Breckland.

606. Responses are detailed in Chapter 28 of the ES.

22.3.1.23. [Landscape and visual impact assessment](#)

607. The following prescribed bodies provided comments in relation to landscape and visual impact assessment:

- East Ruston Parish Council;
- CPRE;
- N2RS;
- Necton Parish Council;
- Norfolk County Council;
- North Norfolk District Council;

- NSAG;
- Ørsted;
- St Peters Ridlington;
- Historic England;
- National Trust;
- Breckland District Council;
- Broadland District Council; and
- Little Dunham Parish Council.

608. Responses are detailed in Chapter 29 of the ES.

22.3.1.24. [Tourism and recreation](#)

609. The following Prescribed bodies provided comments in relation to tourism and recreation:

- East Ruston Parish Council;
- Dereham Town Council;
- N2RS;
- Necton Parish Council;
- Norfolk County Council;
- North Norfolk District Council;
- NSAG;
- RYA;
- St Peters Ridlington; and
- Suffolk County Council.

610. Responses are detailed in Chapter 30 of the ES.

22.3.1.25. [Socio-economics](#)

611. The following Prescribed bodies provided comments in relation to Socio-economics:

- East Ruston Parish Council;
- Happisburgh Parish Council;
- N2RS;
- Necton Parish Council;
- NHS England;
- Norfolk County Council;
- North Norfolk District Council;
- NSAG;
- Ørsted;
- Suffield Parish Council;
- Suffolk County Council;

- Broadland District Council;
- National Farmers Union;
- Aylsham Town Council; and
- Fransham Parish Council.

612. Responses are detailed in Chapter 31 of the ES.

22.4. Statement of Compliance

613. This Chapter demonstrates that all requirements for summarising the section 42 consultation responses received during statutory consultation and having regard to those responses under section 49 of the 2008 Act have been met.

614. It can be concluded from an analysis of this information that the comments, views and impacts identified through the statutory consultation have influenced the development of the project. A full table of responses from statutory consultation under section 42, and the regard had by the Applicant can be seen in Appendix 22.1.

23. SUMMARY OF RESPONSES UNDER SECTION 47 OF THE 2008 ACT

23.1. Introduction

615. This Chapter of the Consultation Report sets out how the Applicant has complied with its duty under section 49 of the 2008 Act to take account of consultation responses received under section 47 of the 2008 Act. Information pertaining to consultation responses received under sections 42 and 48 of the 2008 Act is presented in Chapters 22 and 23 of this Report respectively.
616. This Chapter seeks to provide the information relevant to section 47 consultation responses as required in the Consultation Report under sections 37(7)(b) and 37(7)(c) of the 2008 Act and the relevant parts of the DCLG guidance on pre-application consultation.

23.2. Legislative context

617. Section 49(2) of the 2008 Act requires the applicant to have regard to relevant responses to the consultation and publicity that has been undertaken under sections 42, 47 and 48. A relevant response for the purposes of section 47 is defined in section 49(3)(a) as a response from a person consulted under section 47 that is received by the applicant before the deadline imposed.

23.3. Summary of responses received during the non-statutory consultation

618. Chapters 19, 20 and 21 contain a full summary of the consultation undertaken, the feedback received, and the regard had to that feedback by the Applicant.
619. This extensive preliminary work has been undertaken has resulted in project refinements through the process leading up to the statutory consultation period. The Applicant has had regard for the feedback received during the non-statutory consultation and refined the proposals where possible as a result.

23.4. Summary of responses received during the statutory consultation period

620. The following table contains a summary of the key themes and issues that arose within the feedback received during the statutory consultation period. The Applicant's response to these issues and explanation of the regard had for these is also included.

- 621. A map highlighting the changes made to the project following the statutory consultation period can be found in Appendix 23.1.²⁷
- 622. A full list of issues raised through feedback provided, and a description of the Applicant’s response to each issue is included in ‘Hearing Your Views III’ (Appendix 3.3).

Table 23.1 Summary of responses to section 47 and regard had by the Applicant

Summary Issue	Regard had by the Applicant
<p>HVAC vs HVDC – transmission system</p> <p>The issue which has prompted the greatest number of comments relates to Norfolk Vanguard’s power transmission system. To this point, the project design envelope has considered both HVAC (High Voltage Alternating Current) and HVDC (High Voltage Direct Current) transmission systems and assesses the impacts of both options through the EIA process. This has been an approach adopted by other large offshore wind farm proposals in recent years due to the uncertainty of the preferred technology at detailed design and procurement stage.</p> <p>A number of documents were produced to inform responses to the statutory consultation including the PEIR and the Consultation Summary Document, as well as newsletters, the landowner information pack, photomontages, digital models and an FAQ document. These materials have all provided information for those interested in the implications of these two transmission system options, and why The Applicant has sought to maintain optionality, as is permissible within the NSIP process. However, as the decision is in large part related to the availability of appropriate technology, that can provide a resilient and reliable transmission solution within the development timeframe of the project, at a competitive cost which enables energy generation at a keen price for the UK consumer, it was not considered appropriate to ask directly for views on the transmission system.</p> <p>Nevertheless, this was the single most commented upon topic among respondents. Clearly, people</p>	<p>HVAC vs HVDC – transmission system</p> <p>Since the Applicant first began a dialogue with residents in the scoping area in order to locate the infrastructure necessary to connect the power from the offshore wind farm into the National Grid, in October 2016, the Applicant highlighted that preliminary design would consider both types of transmission systems currently available to modern power generation projects. As local people and stakeholders’ understanding of the implications of both systems have developed and deepened, the Applicant has received more numerous, and more detailed feedback on this topic, from communities and from local groups and elected representatives. The Applicant’s FAQs have reflected this evolving interest.²⁸</p> <p>As noted above, continued dialogue with the supply chain on the development and availability of future-proof, innovative technology within the timeframe the Applicant needs to operate (for example to meet Government expectations with respect to the UK’s future energy gap and CO₂ – emissions targets) helps unlock sustainable solutions for technical challenges. Two challenges posed by emergent HVDC technology have been: availability and reliability/resilience during operation. Linked to the first is competitiveness – offshore wind is now one of the cheapest forms of energy generation, helping to drive down costs for UK consumers. Linked to the second are factors common to relatively untested systems and their reduced inbuilt resilience in a HVDC system, which deploys fewer cables than an HVAC system. For this project, the Applicant recognise that there are environmental advantages to HVDC transmission over HVAC transmission.</p>

²⁷ This map was published in the February 2018 newsletter. Since this point however a few additional red line boundary changes have been made as a result of further consultation and engagement with landowners. The most up-to-date interactive map is available to view on the project [website \(www.vattenfall.co.uk/norfolkvanguard\)](http://www.vattenfall.co.uk/norfolkvanguard).

²⁸ June 2017 FAQ Document: <http://bit.ly/2o7pCxG>

Summary Issue	Regard had by the Applicant
<p>have been engaged by the topic and the Applicant welcomes their considered and detailed feedback. Of those that commented on the choice of HVAC versus HVDC transmission in their questionnaire responses (which amounted to 22% of respondents), 97% expressed a preference for HVDC transmission because they felt it would result in reduced onshore impacts, compared with a HVAC option, and specifically, eliminate the need for CRS. This preference for HVDC technology was also reflected in the feedback received via email and postal submissions and was also raised in the other formal representations submitted during the statutory consultation period. A handful of respondents expressed a preference for HVAC technology. Two reasons were given here; one: to avoid interference affecting local radio wave frequencies, and two: concern that the visual impact of the HVDC substation would be greater than that of an HVAC substation near Necton.</p> <p>It is notable that respondents living close to Necton and the proposed project substation location and National Grid extension works made far fewer comments directly expressing a desire for HVAC transmission over HVDC transmission, although some noted that while occupying the same footprint, substation infrastructure would potentially result in greater visual impacts with a HVDC system.</p>	<p>As a result of continued commitment to sustainable solutions, the Applicant has continued to explore the feasibility of a project which utilises HVDC; design work and supply chain engagement has therefore advanced rapidly, which has allowed us to commit now to a project deploying an HVDC transmission system, for Norfolk Vanguard and Norfolk Boreas.</p> <p>Our refined onshore project design reflects this choice and encompasses the following embedded mitigation:</p> <ul style="list-style-type: none"> • HVDC requires fewer cables than the High Voltage Alternating Current (HVAC) solution for offshore and onshore cables; • During the cable installation phase for offshore there is less pre-sweep dredging, cable protection and fewer crossings required; • During the duct installation phase for onshore, this reduces the cable route working width (for Norfolk Vanguard and Norfolk Boreas combined) to 45 m from the previously identified worst case of 100 m. As a result, the overall footprint of the onshore cable route required for the duct installation phase is reduced from approx. 600 ha to 270 ha; • The width of permanent cable easement onshore is also reduced from 54 m to 20 m; • Removes the requirement for a CRS; • Reduces the maximum duration of the cable pull phase from three years down to two years; • Reduces the total number of jointing bays onshore for Norfolk Vanguard from 450 to 150; and • Reduces the number of drills needed at trenchless crossings (including landfall).
<p>Visual, environmental and amenity impact of onshore infrastructure</p> <p>Many people described their concerns regarding visual, environmental and amenity impacts of proposed onshore infrastructure and the impacts on the communities living closest to proposed sites.</p> <p>Understandably, comments relating to the Substation, or the CRS generally, tended to depend on the geographic location of the respondent.</p>	<p>Visual, environmental and amenity impact of onshore infrastructure – substation works</p> <p>The decision to deploy HVDC technology means that the great majority of concerns about visual, amenity and environmental impacts of residents of the areas of Witton, Ridlington and East Ruston and others about plans for CRS and other permanent electrical infrastructure in rural north Norfolk are no longer pertinent. Concerns associated with cable burial of course remain and the Applicant responds to these below.</p>

Summary Issue	Regard had by the Applicant
<p>Those living closer to Necton were focused on key issues related to the project substation and National Grid extension works, whilst those in living in and around the villages of East Ruston, Ridlington, were concerned with the impacts of CRS. The Applicant received comments with respect to both the proposed CRS location 5a near Ridlington and 6a nearer Fox Hill and East Ruston. While comments were received which offered reasons why from the respondents’ perspective, one or other of these locations was wholly unsuitable, it should be noted that most of these comments were preceded with the general observation that both potential CRS siting options were located in open agricultural land offering wide horizons but little natural screening and topographic undulation and therefore neither was considered a good option. There were suggestions that locating CRS elsewhere, e.g. in brownfield sites near North Walsham, might be more appropriate.</p> <p>A common concern about the CRS related to visual impact. Concerns were raised about the size and scale of the proposed infrastructure, its effects on visual amenity, impacts in relation to historic landscape and buildings and rural setting. Many expressed concerns about local amenities they felt could be negatively impacted by proposed development, for example Munn’s Loke and key viewpoints like that from St Peter’s Church, Ridlington. Concerns were raised too with respect to impact on the local tourism industry, and knock-on effects on other local businesses. Participants voiced concerns about disruption to local agriculture and local drainage issues too. There were also concerns that construction and operation of the CRS would impact local wildlife habitats and species.</p> <p>Respondents commenting on the substation primarily raised concerns about its proximity and impact upon the village of Necton as well as Ivy Todd and other residences close by. Concerns raised related to visual impact, noise, impacts to the natural environment and wildlife. There were also concerns about increased traffic through Necton and Ivy Todd.</p> <p>The Applicant received just under 20 comments across questionnaires, emails and significant group responses stating opposition to the siting of substation infrastructure at the sites proposed in the PEIR and consultation documents. Alternative</p>	<p>The Applicant has had regard to comments regarding visual, environmental and amenity impact and will seek to develop appropriate mitigation to address these concerns. The comments offered with respect to developing appropriate planting schemes will be explored by the team. The Applicant will seek to undertake early, layered planting – to enhance or create layers of hedgerows and wooded strips or stances and organic, native planting schemes, where appropriate.</p> <p>The Applicant will explore design options with respect to the enclosure housing the electrical infrastructure in order to minimise visual impacts. The Applicant can work with colouring to make it less prominent from key viewpoints.</p> <p>The key mitigation in relation to landscape and visual impacts of the project substation is its location. The proposed project substation footprint makes effective use of topographic undulations and natural screening. The Applicant will produce additional viewpoints to illustrate this, in response to requests from community members and stakeholders. The Applicant will also produce viewpoints which approximate more closely to the natural field-of-view (in addition to the wide-angle photomontages produced previously). And finally, in order to help people make use of illustrative visual tools like photomontages, the dimensions of local landscape features appearing within the view (e.g. mature trees, or buildings) will be noted to help people visualize the relative dimensions of proposed and existing features.</p> <p>Noise has been a key concern of those living in and around Necton – specifically claims that the cumulative impact of the Norfolk Vanguard (and later Norfolk Boreas) electrical infrastructure will exceed local noise limits. The majority of the electrical assets in the HVDC substation are housed within a building which lends itself to acoustic insulation. Outdoor assets can make use of industry standard noise enclosures to mitigate operational noise. Detailed design work and noise modelling will inform plans submitted in the DCO application. The Applicant is confident that all necessary standards will be met and that it will be possible to minimise noise and vibration impacts associated with the development and operation of the electrical infrastructure.</p>

Summary Issue	Regard had by the Applicant
<p>sites were proposed in farmland a few kilometres from the existing National Grid substation, and suggestions were made about wholly different connection points to the National Grid, in other parts of Norfolk and East Anglia.</p> <p>The consultation questionnaire asked people for comments on mitigation measures, to help mitigate for visual and other impacts. Respondents did express concerns about the adequacy of proposed screening and planting around each of these pieces of infrastructure and the time it would take for trees and planting to become mature enough to offer effective visual screening of the CRS and of the project substation and National Grid substation extension. Ideas submitted to improve mitigation included using trees native to the area, starting planting early to allow screening to mature prior to construction and developing ‘natural’ or ‘organic’ planting patterns (i.e. not a straight line of trees).</p> <p>There were also comments related to the impacts of cable laying along the proposed buried cable corridor, however there were significantly less comments about more permanently visible infrastructure.</p>	<p>Works to undertake the National Grid substation extension will gain access via the existing junction off the A47 with a ‘no right turn’ traffic management scheme in place. For access to the onshore project substation there will be a new access at Spicer’s Corner, with a filter lane. These measures mean all construction traffic is kept away from Necton and Ivy Todd.</p> <p>The Applicant received a number of representations from local people expressing their concern about the local hydrology and historic flooding episodes, and that engineering works, and the hard standing on which infrastructure would be sited could increase local flooding risk. The Applicant is working on drainage design and will be consulting with local and affected people to help us design effective solutions that will mitigate risk associated with the project works.</p> <p>In relation to impacts on wildlife habitats and species, as well as cultural heritage features, the reduced cable corridor width provides enhanced flexibility to microsite works in order to avoid sensitive features. The Applicant will be submitting mitigation plans alongside the DCO, these will be agreed with local and national bodies and implementation will be monitored and evaluated to ensure compliance.</p> <p>Other concerns people mentioned with regards to potential construction and operation impacts near Necton relate to traffic and transport issues. Access onto the A47 from Necton has been described to us as a cause for concern and there have been fears that the construction and maintenance traffic would exacerbate any issues currently experienced by local road-users. The applicant plans to mitigate this risk by creation of a dedicated works access, to the north of Necton village, near Spicer’s Corner. This will have a right turn filter lane on the A47, so will not impede normal traffic flows. This access means works traffic and HGV will not enter the village.</p> <p>Visual, environmental and amenity impact of onshore infrastructure – cable route corridor For the most part, statutory consultation responses relating to the onshore cable corridor from organisations like Campaign for the Protection of Rural England, councils and individuals representing parish, district and regional views express desires for an overarching or holistic reduction in environmental impact along</p>

Summary Issue	Regard had by the Applicant
	<p>the cable corridor and they saw the choice of HVDC transmission technology as an effective way of achieving this. Some among this group, as well as individuals with a very local interest in particular sensitive features also expressed concerns about open trenching techniques, when horizontal directional drilling or other trenchless methods might be a way of minimising impacts.</p> <p>As a result of consultation and responses received, there are a number of locations where the Applicant now plans additional trenchless crossings, in order to reduce impacts on features like Marriotts Way County Wildlife Site, Paston Way and Knapton Cutting County Wildlife Site and Wendling Carr County Wildlife Site in addition to previous commitments to undertake HDD under the Wensum and the Bure.</p> <p>The Applicant will continue to work with local landowners to microsite the cable corridor so that disruption to their normal operations are minimised and mitigated as far as is practicable. Some of the changes to the cable route corridor, result from these local and evolving landowner agreements.</p> <p>The Applicant will continue to work with Ørsted – developers of the Hornsea Project Three offshore wind farm – to deliver a collaborative approach that minimises impacts associated with the crossing point of the respective cables, near Reepham, both in terms of how the Applicant constructs the actual crossing point, design principles to ensure that all relevant regulations, for example relating to health and environmental controls and traffic and transport management are adhered to.</p>
<p>Landfall The next most commented on topic was landfall, and in particular the siting of landfall – where offshore transmission cables from the windfarm turbines come ashore and connect with onshore transmission cables. A key concern expressed was that the horizontal directional drilling (HDD) process required to install ducting necessary for bringing buried cables ashore would cause damage to Happisburgh beach and cliffs. Coastal erosion in this location was highlighted as a key concern and people argued that any drilling might risk exacerbating coastal erosion, and dynamic coastal processes and coastal retreat. People also expressed a concern that these active natural</p>	<p>The offshore and onshore cable routes have been chosen to minimise environmental impacts associated with the project. Landfall is part of this – avoiding designated sites offshore, such as the Marine Conservation Zone (MCZ) and onshore (The Broads National Park). The site selection chapter in the PEIR and the relevant section in the Consultation Summary Document summarise the key considerations which led to Happisburgh South as the best place to make landfall.</p> <p>Through consultation with local people and stakeholders the Applicant has been able to refine its plans for landfall. Accordingly, the Applicant is committing to a 'Long HDD', which means the</p>

Summary Issue	Regard had by the Applicant
<p>processes could, over time, expose buried transmission cables. Several people suggested that it would be beneficial to Happisburgh if sea defences were to be improved in this area.</p> <p>Some respondents noted the ecological value of the cliffs around Happisburgh, as nesting ground for numerous bird species.</p> <p>A number of respondents (over 60 comments across a number of different questions on the questionnaire) recorded a preference for alternative landfall locations "away from Happisburgh". Some of the alternative locations for landfall or to connect to the National Grid with the highest number of suggestions included coming ashore at Bacton, or at Kings Lynn and connect to National Grid's Walpole Substation. Suggestions also included the potential to connect to an offshore ring main (ORM) or alternative marine cable route that ran offshore to one of these alternative locations, rather than straight to Happisburgh and then across land to Necton.</p>	<p>installation process will not involve any works taking place on the beach or inter-tidal zone. The landfall search zone will be refined further once the Applicant has processed the results of ongoing geophysical investigations and borehole data. Also fewer ducts will be required than for the alternative HVAC solution, meaning disruption and timescales of installation are minimised.</p> <p>The Applicant's intention is that the design of the landfall will avoid, as far as possible, cables being exposed due to the effects of ongoing coastal erosion in the lifetime of the project. The Applicant will share design cross-sections of the proposed long HDD at landfall, drawn in relation to the predicted effects of the dynamic coastal processes currently causing erosion, as well as profiles of modelled probability forecasts of coastal retreat.²⁹</p> <p>Access to the landfall construction compound will be gained from Whimpwell Street. There will be no requirement for construction vehicles to utilise public car parks in Happisburgh. Construction traffic will be managed in agreement with local highways through the Construction Traffic Management Plan. The Applicant has committed to involving Happisburgh Parish Council in the development and agreement of the Traffic Management Plan.</p>
<p>Construction and traffic impacts</p> <p>Another common concern highlighted during the consultation was the impact of various elements of the project's construction on local roads, particularly in relation to increased HGV traffic. Concerns related mainly to construction of onshore infrastructure (CRS and substation infrastructure) and at landfall. Fewer concerns were raised in relation to construction traffic associated with ducting and pulling through underground cables along the cable corridor. A notable exception related to the potential for cumulative impact, near Reepham, where Vattenfall's projects' cables are proposed to cross with those of Ørsted's Hornsey Project 3.</p> <p>People are worried the road system in parts of rural Norfolk will not accommodate large HGVs and construction traffic. They recommend very</p>	<p>Construction and traffic impacts</p> <p>Construction traffic will be managed in agreement with local highways through the Construction Traffic Management Plan. Due to the decision to proceed with HVDC technology, there will be a reduced potential impact on the local road system as a result of avoiding the construction of CRS. The use of Long HDD also means that at landfall, there will be no construction traffic related to beach works at Happisburgh.</p> <p>The Applicant is in agreement with respondents who note the importance of restrictions on the public highways network in some parts of the cable route. During the main onshore cable corridor ducting phase, construction traffic will use the running track encompassed within the onshore cable corridor (45 m wide).</p>

²⁹ The siting of the landfall construction compound, transition joint pits and drill profile will mitigate exposure of the ducts/cables over the lifetime of the project based on the Kelling to Lowestoft Ness shoreline management plan (2012) to accommodate forecast erosion levels beyond 2055 at a minimum.

Summary Issue	Regard had by the Applicant
<p>close monitoring and planning of traffic management to ensure the local road network can cope with the increased traffic safely, without inconveniencing regular road users and visitors. They also worry that increased traffic will be detrimental to the rural way of life and rural environment. Concerns about the negative impacts on local tourism from increased traffic on the local road network were also highlighted.</p> <p>There was a general preference to ensure that construction vehicles operated outside of peak hours and also had regard for key seasonal considerations, such as summer holidays and Christmas.</p> <p>Given the importance of agriculture locally, respondents also wished to highlight that construction traffic should take account of harvest periods, and acknowledge the fact that at certain points and in key locations, there are likely to be additional farm vehicles and machinery sharing the local road network.</p>	<p>The actual length required and access strategy for this stage of the construction will be determined by the detailed design which will include the siting of joint locations.</p>
<p>Supply chain, employment, skills, education and training</p> <p>Some respondents noted the opportunities the project could create for local businesses and the wider supply chain. Younger participants, particularly those attending drop-ins at Great Yarmouth, and University Technical College Norwich (UTCN), highlighted their interest and support for developing routes into high quality employment, skills development, education and training opportunities. Requests were made by local schools for the Applicant to collaborate on a variety of educational projects, particularly relating to green futures and renewable energy.</p> <p>Linked to this, there were a number of requests for the Applicant to participate in and contribute to projects and events of local community interest. The applicant is particularly interested in these opportunities where the themes of these events align with Vattenfall’s interests e.g. climate-smarter living and rural development.</p>	<p>Supply chain, employment, skills, education and training</p> <p>As noted previously in this report, and also within the Socio-economic chapter of the PEIR, working with the supply chain is important for developers to ensure the Applicant delivers the best possible project. Working closely with the local supply chain offers mutual benefits which the Applicant envisages exploring and maximising over the coming years. Opportunities for the local supply chain to engage with us, particularly during onshore construction may evolve quickly after a positive consent decision from the Secretary of State and the Applicant hopes to facilitate the necessary preparation of local companies so that they are able to deliver the necessary services, by working with industry bodies, and local business support organisations, like the New Anglia Local Enterprise Partnership (NALEP), Chambers of Commerce and East of England Energy Group (EEEGR), and Local Authorities.</p> <p>The Applicant has begun working with local schools, colleges and the University of East Anglia already on pilot projects. Some of these have been very successful and the Applicant is grateful to the learning that has gathered from working with enthusiastic and engaged young people and their establishment staff. The Applicant will build on this preliminary work to offer more learning</p>

Summary Issue	Regard had by the Applicant
	<p>opportunities over the coming months. However, ultimately the aim is to develop a skills strategy that is informed by and aligns with local authority strategy, the NALEP energy sector skills plan and that ensures the Applicant both creates opportunity and supports the aspirations of young people who are keen to work in the sector.</p>
<p>Public consultation</p> <p>Some respondents chose to highlight issues they felt may have discouraged wider involvement of local people in shaping the project through (informal and formal, or statutory) consultation.</p> <p>Some raised concern about the length and technical nature of the project’s Preliminary Environmental Impact Report (PEIR) and the ability of local residents to fully comment on such a lengthy document.</p> <p>Some feedback also noted that there was concern that local communities would be unclear on the consultation process and the relationship between the project and Norfolk Boreas.</p> <p>General concerns about the adequacy of consultation undertaken were also made by a number of respondents.</p>	<p>Public consultation</p> <p>The project team has been actively engaging with local people, varied organisations and businesses in Norfolk and particularly along the proposed onshore cable route to the area of connection with the National Grid, near Necton, since October 2016.</p> <p>The Applicant has consistently developed materials which aim to enable wide understanding of the project and to provide the available detail in response to those wishing to develop detailed knowledge of the project. This facilitates informed feedback, which the Applicant recognises has great value in terms of improving the robustness of the project design.</p> <p>In addition to the PEIR and Non-Technical Summary of the PEIR, a Consultation Summary Document was produced aimed at informing community consultees of key elements of the project and of the EIA process.</p> <p>Ensuring a clear understanding of the project and its relationship with Norfolk Boreas has been a key focus for the Applicant throughout the non-statutory consultation.</p> <p>Phase II informal consultation particularly drew the attention of participants to the fact that Norfolk Boreas would be subject to a separate DCO application – and the feedback received indicated that those who responded understood this. See Appendix 3.2 – Hearing Your Views II for further information.</p> <p>Section 5.1 of the SoCC specifically sets out the relationship between the Norfolk Vanguard and Norfolk Boreas project. This includes providing timescales for both projects and how people will be able to feed into development of both schemes. In all consultation materials, reference to the relationship with Norfolk Boreas is included. The Consultation Summary Document contained information, including a timeline detailing how the</p>

Summary Issue	Regard had by the Applicant
	<p>Norfolk Boreas project relates to the Norfolk Vanguard project.</p> <p>Since this time, the Applicant has:</p> <ul style="list-style-type: none"> • Distributed around 100,000 newsletters to local households; • Convened 31 public events (including staffed exhibitions, workshops and pop up information points); • Presented information to local parish councils, convened briefings with local MPs and many deliberative meetings with statutory stakeholders, training sessions with schools and colleges, and seen participation among those normally considered “harder to reach” increase; • Spoken with over 2500 people attending events; • Received over 1200 responses providing written feedback to local events (both informal as well as formal consultation associated with the Norfolk Vanguard project); • Received and responded to many hundreds of emails from local people and stakeholders; and • Written many information leaflets, reports and consultation materials responding to local interests, information needs and requests plus many contributions to local media channels (broadcast and print); maintained a proactive social media campaign. <p>More newsletters are planned in order to keep people informed of the progress of project proposals and how they can get involved in the next stages of deciding the projects evolution. There are also regular updates on the project website too.</p> <p>The LLO is based full time in Norfolk, as well as support from a Norwich based agency helping with local engagement. The Applicant continues to deepen and broaden its engagement with organisations who support and represent the interests of people and businesses local to the onshore works and in the region.</p>

23.5. Statement of Compliance

623. This Chapter demonstrates that all requirements for summarising the section 47 consultation responses received during the statutory consultation and having regard to those responses under section 49 of the 2008 Act have been met.

624. It can be concluded from an analysis of this information that the comments, views and impacts identified through the statutory consultation have influenced the development of the project, primarily in relation to:

- The strategic decision to deliver the project by adopting HVDC transmission technology. Since the inception of the Norfolk Vanguard project the Applicant has considered both HVAC and HVDC transmission options. Following consultation, the Applicant has eliminated the need for a Cable Relay Station and will instead opt for HVDC transmission technology;
- A narrower 45 m cable corridor will accommodate buried transmission cables for both Norfolk Vanguard and Norfolk Boreas. An HVDC transmission system allows us to use fewer onshore cables than a comparable HVAC system, thereby minimising overall impacts and maximising flexibility to micro-site around sensitive features. The Applicant has undertaken extensive geophysical surveys early. This has guided the revised cable corridor, including for example the avoidance of heritage sites near St Mary's Kerdiston, and indications of a medieval moat north of Necton. Fewer transmission cables means the landfall work will be completed more quickly;
- The decision to use long HDD at landfall. This means no work is required on the beach. The location of the temporary working compound (60 m x 50 m) will be agreed with local stakeholders within the new search zone, informed by geophysical and geotechnical surveys. There will be no requirement for construction vehicles to use public car parks in Happisburgh;
- Additional trenchless crossings (including HDD) will be deployed to avoid impact on all County Wildlife Sites. Already the Applicant had committed to trenchless crossings of habitats and features protected by national and international designations, now the Applicant will avoid impacts to features including Paston Way and Knapton Cutting, Marriotts Way (twice) and Wendling Carr;
- Illustrations of the HVDC onshore project substation near Necton have been shown during the consultation. Most of the electrical assets are enclosed within a building (the converter hall). Electrical assets outside the converter

hall can be covered by close fitting noise enclosures. These measures provide significant noise mitigation;

- Mitigation planting around the substation will be enhanced, building on expert and local suggestions provided in response to the consultation. Where possible the Applicant will utilise layered planting schemes and mixed native-trees of different heights for natural looking screening; and
- Works to undertake the National Grid substation extension will gain access via the existing junction off the A47 with a 'no right turn' traffic management scheme in place. For access to the onshore project substation there will be a new access at Spicer's Corner, with a filter lane. These measures mean all construction traffic is kept away from Necton and Ivy Todd.

24. SUMMARY OF RESPONSES UNDER SECTION 48 OF THE 2008 ACT

24.1. Introduction

625. This Chapter of the Consultation Report sets out how the Applicant has complied with its duty under section 49 of the 2008 Act to take account of consultation responses received under section 48 of the 2008 Act. Information pertaining to consultation responses received under sections 42 and 47 of the 2008 Act is presented in Chapters 10 and 11 of this report respectively.

626. This Chapter seeks to provide the information relevant to section 48 consultation responses as required in the Consultation Report under sections 37(7)(b) and 37(7)(c) of the 2008 Act and the relevant parts of the DCLG guidance on pre-application consultation.

24.2. Legislative context

627. Section 49(2) of the 2008 Act requires the applicant to have regard to relevant responses to the consultation and publicity that has been undertaken under sections 42, 47 and 48. A relevant response for the purposes of section 48 is defined in section 49(3)(a) as a response from a person consulted under section 48 that is received by the applicant before the deadline imposed.

24.3. Summary of responses received

628. No responses were received specifically in relation to the section 48 publicity.

24.4. Statement of Compliance

629. Given that no responses were received specifically to the section 48 notice, none are summarised in this Chapter of the Consultation Report. However, comments received from respondents who heard about the consultation from newspapers (which could have included the section 48 notice) and the regard that the Applicant has had to these comments is set out in Chapter 23 of the Consultation Report.

25. POST-FORMAL CONSULTATION ENGAGEMENT

25.1. Introduction

630. This Chapter of the Consultation Report sets out further non-statutory "informal" engagement with local communities that the Applicant has undertaken following its formal consultation activities as prescribed by the 2008 Act and described in previous chapters in this Consultation Report. This engagement was held to further explore and seek to overcome some of the issues raised during the formal consultation period.
631. As described in Chapter 5, engaging in consultation throughout the application process and beyond is encouraged in the DCLG guidance on pre-application consultation.
632. Where necessary, in order to allow finalisation of the Consultation report, the ES and DCO application, a cut-off of the 1st May 2018 has been used for consultation information that has been incorporated in these documents. Consultation after this date will be given due consideration to inform the ongoing project development and examination.

25.2. Summary of post formal consultation non-statutory consultation

25.2.1.1. The Evidence Plan Process post section 42 consultation

633. Following section 42 consultation, ETG meetings (Table 25.1) were held to discuss PEIR responses and to agree, where possible, the approach to updating the assessments and finalising the ES. ETG meetings also covered feedback on the draft Information to Support HRA report.
634. As with the EPP prior to section 42 consultation (discussed in Chapter 9 and Sections 12.5 and 13.5), minutes from each meeting will form the basis for the Statements of Common Ground (SOCG) with a number of technical consultees following the DCO application submission. Minutes of meetings post Section 42 consultation are provided in Appendices 25.1 to 25.9.
635. In addition, a number of documents were provided to the expert topic groups for consultation. These documents relating to consultation post Section 42 are provided in Appendices 25.10 to 25.12.
636. A draft Information to Support HRA report was submitted to relevant topic groups (marine mammals, benthic ecology, marine physical processes, offshore ornithology and onshore ecology) in February 2018.

Table 25.1 Consultation under the EPP ETGs post section 42 consultation

Date	Contact Type	Organisation	Topic
18 th December 2018	Email	From The Wildlife Trust	Comments on the approach to the HRA.
3 rd January 2018	Email	From Natural England	Written advice on approach the marine mammal HRA and clarifying PEIR feedback following meeting on the 8 th December 2017.
16 th January 2018	Email	To Environment Agency, MMO, Natural England The Wildlife Trust, North Norfolk District Council, Cefas and WDC	Provision of technical reports to support the benthic HRA (drafts of document 6.4 and Appendix 7.1 of the Information to Support HRA report (document 5.3)).
19 th January 2018	Email	To Environment Agency, MMO, Natural England TWT, North Norfolk District Council, Cefas and WDC	Provision of further technical reports (Appendix 5.1 of the ES (document 6.2)) to support the benthic HRA.
22 nd January 2018	Onshore Ecology and Ornithology ETG meeting – PEI Responses	Environment Agency, Breckland Council, Natural England Norfolk County Council, North Norfolk District Council and Norfolk Wildlife Trust	PEIR comments and approach to updating assessments (minutes provided in Appendix 25.1).
23 rd January 2018	Onshore Water Resources, Flood Risk, Ground Conditions and Contamination ETG meeting – PEI Responses	Anglian Water, Environment Agency, Internal Drainage Board and Norfolk County Council	PEIR comments and approach to updating assessments (minutes provided in Appendix 25.2).
24 th January 2018	Landscape and Visual Impacts ETG meeting - PEI Responses	Breckland Council, Broadland District Council, Norfolk Coast Partnership and North Norfolk District Council.	PEIR comments and approach to updating assessments (minutes provided in Appendix 25.3).
24 th January 2018	Onshore Archaeology and Cultural Heritage ETG meeting – PEI Responses	Breckland Council, Broadland District Council, Historic England, National Trust, Norfolk County Council and North Norfolk District Council	PEIR comments and approach to updating assessments (minutes provided in Appendix 25.4).
25 th January 2018	Onshore Traffic and Transport ETG meeting – PEI Responses	Highways England and Norfolk County Council	Access options from the A47 discussed, and conversation regarding junction sensitivity tests (minutes provided in Appendix 25.5).

Date	Contact Type	Organisation	Topic
16 th January 2018	Email	To EIFCA	Provision of technical reports to support the benthic HRA (drafts of document 6.4 and Appendix 7.1 of the Information to Support HRA report (document 5.3)).
31 st January 2018	Marine Physical Processes and Benthic Ecology HRA ETG meeting	Cefas, Environment Agency, EIFCA, MMO and Natural England	PEIR comments and approach to HRA (minutes provided in Appendix 25.6).
1 st February 2018	Email	From Norfolk County Council	Provision of examples of colour guidance produced by AONB partnerships.
5 th February 2018	Email	From Natural England	Provision of advice from Natural England regarding great crested newt mitigation alternatives.
6 th February 018	Email	from Natural England	Review of Onshore Ecology and Ornithology baseline reports.
9 th February 2018	Email	To Norfolk County Council, Natural England North Norfolk District Council, Environment Agency and Norfolk Wildlife Trust	Provision of the Norfolk Vanguard Bat Activity Survey Report (Appendix 22.4 of the ES (document 6.2)).
13 th February 2018	Email	From Natural England	Confirmation that the standard best practice advice to the aggregates industry is a 50 m buffer around <i>Sabellaria spinulosa</i> reef.
19 th February 2018	Onshore Ornithology, Baseline Report Review Meeting	Natural England	Review of comments from Natural England on Onshore Ornithology PEIR Chapter. Agreement on data collection and survey delivery (minutes provided in Appendix 25.1).
19 th February 2018	Email	From Natural England	Provision of Site of Community Importance (SCI) Position Statement in relation to sandbanks from the Dogger Bank Teesside OWF.
22 nd February 2018	Email	To Natural England North Norfolk District Council, Environment Agency, Norfolk Wildlife Trust, MMO, The Wildlife Trust and Cefas	Provision of draft Norfolk Vanguard Information to Support Habitats Regulations Assessment (HRA) (document 5.3).
22 nd February 2018	Letter	From Natural England	Natural England advice regarding potential impacts from the offshore cable installation to Annex I habitat within the

Date	Contact Type	Organisation	Topic
			Happisburgh Hammond and Winterton SAC.
22 nd February 2018	Email	To Natural England	Email highlighting that the use of HVDC reduces the impacts of the project on the Happisburgh Hammond and Winterton SAC.
26 th February 2018	Email / Note	To Environment Agency	Update on proposed assessment method for water receptors.
2 nd March 2018	Email	To All Members of EPP	Notification of the Vattenfall decision to deploy HVDC.
4 th March 2018	Email	To Norfolk County Council and Historic England	Explanation of the implications of the HVDC option with regard to Onshore Archaeology.
6 th March 2018	Email	From Natural England	Comments on bat activity survey report.
8 th March 2018	EPP Meeting – Offshore Archaeology and Cultural Heritage	Historic England	Project update and approach to Written Scheme of Investigation (minutes provided in Appendix 25.7).
8 th March 2018	Email	From Natural England	Comments from Natural England on the potential impacts of the cable corridor passing through the Cromer Shoal MCZ.
9 th March 2018	Email	To Breckland Council	Provision of the HVDC operational noise technical note (Appendix 25.10).
12 th March 2018	Great Crested Newt Mitigation Meeting	Natural England Norfolk Farming and Wildlife Advisory Group	Discussion regarding the approach to Great Crested Newt (GCN) mitigation for the proposed development.
15 th March 2018	Email / Memo	To Norfolk County Council	Memo detailing an update to the proposed approach for the Norfolk Vanguard CIA (provided in Appendix 25.11).
15 th March 2018	Email	From Natural England	Provision of Natural England reef advice in Happisburgh, Hammond and Winterton SAC, and Natural England and Norfolk County Councils advice on <i>Sabellaria spinulosa</i> reef.
21 st March 2018	Email	From MMO	MMO's feedback on the HRA.

Date	Contact Type	Organisation	Topic
22 nd March 2018	EPP Meeting – Water Resources	Environment Agency, Anglian Water	Meeting to discuss crossing of Groundwater SPZ's, including the North Walsham and Dilham canal (minutes provided in Appendix 25.2).
23 rd March 2018	Email	From RSPB	RSPB's comments on the HRA.
26 th March 2018	Offshore Ornithology HRA Conference Call	Natural England and RSPB	Project update and comments on HRA for Offshore Ornithology (minutes provided in Appendix 25.8).
26 th March 2018	Marine Mammal ETG Conference Call	Natural England MMO, The Wildlife Trust and WDC	Discussion of feedback on the draft Information to Support HRA for Marine Mammals (minutes provided in Appendix 25.9).
27 th March 2018	Email	From Norfolk County Council	Request of additional projects to be considered as part of the CIA.
4 th April 2018	Email / Memo	Broadland District Council, Breckland Council and North Norfolk District Council	Request for confirmation of projects to be included in the CIA.
12 th April 2018	Email	To Highways England	Provision of A47 Access Technical Note (provided in Appendix 25.12).
13 th April 2018	Email	To Natural England MMO, WDC and The Wildlife Trust	Provision of draft In Principle Southern North Sea cSAC Site Integrity Plan (document 8.17) for review.
23 rd April 2018	Great Crested Newt – Draft Licence Meeting	Natural England	Discussion and agreement on the draft GCN licence submission (minutes provided in Appendix 25.1).
23 rd April 2018	Onshore Habitats Regulations Assessment Meeting	Natural England	Discussion of Natural England comments on the onshore ecology section of the HRA Report (minutes provided in Appendix 25.1).

637. As a result of the EPP engagement that took place following the statutory consultation, and following consideration of the PEIR and feedback from section 42 and section 47 consultees, a number of further project commitments were agreed. These are summarised in Table 25.2 below.

Table 25.2 Summary of EPP project commitments post section 42 consultation

Summary Issue	Applicant response and influence on the project
<p>Landfall Regarding the landfall location, residents were concerned about the impact to the beach and cliffs at Happisburgh if the short HDD option was to be taken forward.</p>	<p>Both the long and short options were included in the PEIR, however, following consultation responses after PEIR submission, a decision was made to only carry forward the long HDD scenario at landfall. This would remove the need for construction on the beach and thus reduce the impact on the local communities. It will also reduce the impact on the nearby cliffs, which was a concern of several groups.</p>
<p>Mitigation planting There were concerns regarding the timeframe for mitigation planting to have full effect over the design life of the project.</p>	<p>A project decision has been made post-PEIR to install mitigation planting early, at the construction phase, where possible. This will allow the trees and shrubs several years of growth prior to project commissioning and provide full mitigation over a longer time.</p>
<p>Trenchless crossings There were concerns regarding the use of cable bridges in the unlikely scenario that this crossing technique would be favourable to other trenchless crossing techniques. Concerns were raised regarding the visual impact of the cable bridges and potential impacts on groundwater.</p>	<p>Following feedback and detailed discussions after PEIR submission, a project decision has been made to remove the cable bridge as an option for trenchless crossing zones.</p>
<p>Cable relay station At several stages throughout the project, consultees and stakeholders were concerned about the presence of a CRS, and the subsequent impacts this could have on the landscape and local population.</p>	<p>The location for a CRS was refined at several stages throughout the phases of the project, and a final decision was made post- PEIR to only carry forward the HVDC onshore electrical solution, removing the requirement for a cable relay station.</p>
<p>Onshore cable route Regarding the onshore cable route, as the Norfolk Boreas project would have the same National Grid connection, if consented, there were some concerns regarding the impact of construction of two cable routes through Norfolk.</p>	<p>A wide search area for the cable corridor was presented at Phase I of the project. Subsequent phases refined this to a 200 m cable corridor, which has now been reduced to 45 m due to the decision to use an HVDC electrical solution. This 45 m cable route will house the cables for both Norfolk Vanguard and Norfolk Boreas, with cable ducts for both projects being constructed during the Norfolk Vanguard construction phase, reducing the total time of construction along much of the route and avoiding the need to reopen trenches.</p>
<p>Onshore geophysical surveys A priority programme of onshore geophysical survey was undertaken pre-application, and this was agreed in consultation with NCC HES. There are areas still</p>	<p>The remainder of the onshore works areas will be surveyed post-consent, as an industry standard approach (this will form part of the post-consent initial informative stages of mitigation).</p>

Summary Issue	Applicant response and influence on the project
outstanding to complete from the priority programme.	
<p>Trenchless crossings A concern was raised by Norfolk County Council and Norfolk Wildlife Trust following PEIR regarding the potential impact of trenching a cable route through County Wildlife Sites.</p>	A decision was taken following additional consultation post-PEIR to employ trenchless techniques at all County Wildlife Sites.
<p>Hedgerow gaps Norfolk County Council raised a concern regarding the uncertainty over width of hedgerow gaps along the cable route.</p>	Following PEIR consultation responses, hedgerow crossing gaps have been reduced to 20 m, with a 25 m maximum at non-perpendicular crossings.

25.2.1.2. Commercial discussions with affected landowners

- 638. On the 16th March 2018, a letter was issued to all landowners and occupiers who have been identified as holding an interest in the final limits, asking them to provide details of their appointed land agents for the purposes of discussing Heads of Terms (HoTs). The letters were accompanied by an updated version of the Landowner Information Pack (see Appendix 25.13) and an updated set of onshore land limit plans showing the land affected by the Order. This letter also offered a further meeting with the Applicant’s land agents if they wished to arrange one.
- 639. Since early 2018 discussions have been ongoing between the land agents working group (a group of all land agents representing the majority of the affected land interests across the project boundary) and the Applicant’s UK Land Manager with regards to the financial items of the HoTs. The land agents have held numerous internal meetings to discuss the terms and Savills has been informally appointed as the lead representative.
- 640. The Applicant’s land manager has had 36 rounds of negotiation, which include numerous meetings, emails and telephone conversations with the Land Agent Working Group to discuss and agree the principle terms. The full set of HoTs was also issued to the land agent group late February 2018 to identify any outstanding comments across the wording in general. Numerous phone and email correspondence has been exchanged between the Applicant and Savills on the terms and an agreed position was achieved on 16th May 2018. Following this agreement, HoTs were issued to the majority of land interests and their representing agents on 18th May 2018.
- 641. The following table records further engagement with landowner organisations during this period.

Table 25.3 Engagement with landowner organisations in relation to commercial issues

Date	Contact Type	Organisation	Topic
28 th February 2018	Email	NFU/CLA/ CAAV and Agents	Copy of proposed HOTs and Payment schedule.
16 th March 2018	Email	NFU/CLA/ CAAV and Agents	Updates to RLB, letter re HVDC solution and requesting agents details.
16 th March 2018	Email	NFU/CLA/ CAAV and Agents	Copy of Landowner Pack issued.
2 nd May 2018	Email	NFU/CLA/ CAAV and Agents	Update on consultations and advise of negotiations with agents group re HOTs.

25.2.1.3. Engagement with the local community

642. Following the close of the statutory consultation period an interim consultation report ('Hearing Your Views III') was produced. This report was published on 22nd February 2018 on the project website and contained a detailed summary of the consultation undertaken, as well as analysis of the feedback received. This report can be viewed in Appendix 3.3.
643. To coincide with the publication of this interim consultation report, a community newsletter was also produced and issued to all residents living within the PCZ. The newsletter contained the following information:
- An overview of the statutory consultation undertaken;
 - Summary of the feedback received;
 - Summary of the changes made to the project as a result of the feedback;
 - Timeline and next steps; and
 - Community update on work with the local community.
644. The newsletter was also made available on the project website. This newsletter can be found in Appendix 20.14.
645. A number of stakeholder update meetings were also arranged following the close of statutory consultation in order to provide an update on the project and the feedback received to the consultation. The following meetings took place during this period:

Table 25.4 Summary of meetings held with community representatives post statutory consultation

Date	Contact Type	Organisation	Topic
22 nd February 2018	Meeting	Local Authority briefing to: Norfolk County Council / North Norfolk District Council / Breckland District Council / Broadland District Council / Great Yarmouth Borough Council	Project update following statutory consultation.
23 rd February 2018	Meeting	George Freeman MP & Necton Parish Council	Project update / Local opportunities discussion / mitigation.
23 rd February 2018	Meeting	Keith Simpson MP	Project update.
27 th March 2018	Meeting	George Freeman MP	Project update / Local opportunities discussion / mitigation.
27 th March 2018	Meeting	Norman Lamb MP	Project update / Local opportunities discussion.
11 th April 2018	Meeting	North Norfolk District Council	Project update.

646. In addition, on the 22nd February 2018, following the publishing of the Interim Consultation Report ('Hearing Your Views III'), the LLO emailed all Parish and Town Councils within the PCZ with an update on the project, and to offer a visit and presentation. A copy of this email is included in Appendix 25.14. The following list of Town and Parish Councils took up the offer:

Table 25.5 List of meetings with town and parish councils following statutory consultation

Date	Organisation
5 th March 2018	Necton Parish Council
12 th March 2018	Happisburgh Parish Council
14 th March 2018	Reepham Town Council
21 st March 2018	Colby and Banningham Parish Council
21 st March 2018	Aylsham Town Council
3 rd April 2018	North Walsham Town Council
17 th April 2018	Oulton Parish Council
18 th April 2018	Reepham Town Council*
9 th May 2018	Reepham Town Council**
14 th May 2018	East Ruston Parish Council

Date	Organisation
15 th May 2018	Witton and Ridlington Parish Council

647. The agenda for all meetings included:

- Statutory consultation overview;
- The big developments – explained;
- A focus on any changes to the project close to the relevant parish/town council including looking at pertinent route maps together;
- Update on supply chain and skills; and
- Timelines and next steps.

648. In response to requests from local district, parish and town councillors, second* and third** visits were arranged to Reepham Town Council to consult on changes to the cable route corridor around Reepham made following the statutory consultation (see Table 25.5 above). The second visit involved a senior project engineer and site visits to nearby roads, at proposed cable corridor crossing points, which residents and their elected representatives had highlighted as being of concern. Following these additional meetings, further information was provided to Pettywell residents as agreed at the meetings. Please see Appendix 25.15 to see a letter sent to Pettywell residents.

649. Following a review of the questions posed during these meetings, and feedback and engagement from local communities via the information line number and project email address, an updated FAQ document was developed. The document sought to provide answers to key queries, and was designed to be as accessible as possible.

650. The FAQ document was then published on the project website on 25th April 2018 and issued directly to all Town and Parish Councils within the PCZ. A copy of the FAQ document can be viewed in Appendix 4.2.

651. In addition, further fact sheets were produced in response to a number of queries from the local community. These fact sheets are listed below and made available to supplement the FAQ document. They were published on the project website.

- EMF Information Sheet³⁰, and
- Vattenfall and Ørsted Information Sheet³¹.

652. The community information line and project email address also remained active throughout the period following statutory consultation and information was provided on an ongoing basis to interested parties wishing to find out more about the project via these methods.

³⁰ <https://corporate.vattenfall.co.uk/contentassets/bf0e5e31bbab467eaf02040c7b17513a/vattenfall-emf-information-sheet.pdf>

³¹ <https://corporate.vattenfall.co.uk/contentassets/bf0e5e31bbab467eaf02040c7b17513a/vattenfall-orsted-emf-information-sheet.pdf>

26.CONCLUSION

653. The Applicant has undertaken pre-application consultation on the proposed Norfolk Vanguard project in accordance with the requirements of the Act, secondary legislation and in line with relevant Government and PINS advice. The Applicant has consulted the local community (including the ‘offshore’ community), local authorities, landowners and those with an interest in the application site, those prescribed by the relevant regulations and others whose views the Applicant considered important.
654. The Applicant’s consultation has gone considerably beyond the statutory requirements. Non-statutory consultation with stakeholders and technical consultees began in 2016, has continued right up until the date of submission and will continue as the project progresses. All responses received to the statutory and non-statutory consultation periods were given full consideration and influence on the project where appropriate. Where the Applicant has not been able to take forward a recommendation for a change to the project, this has been explained within this report or the appendices (see Appendix 22.1).
655. Non-statutory consultation played an important role in the early development and refinement of the proposals prior to the statutory consultation period.
656. Through analysis of feedback on the consultation process during the non-statutory consultation phases, engagement with relevant local authorities during the development of the SoCC, the statutory consultation process was refined to provide the most appropriate means of engaging with local communities and consultees. Careful consideration was given to identify those living in the vicinity of the project and those that may be affected by the wider impacts of the development.
657. A wide range of methods were adopted in order to communicate appropriately with the community. The Applicant has sought to make consultation materials easy to understand and accessible and has encouraged members of the community to participate and make their views known through feedback forms, at public information days and via the website, emails, phone calls and written responses.
658. Issues have been raised in all strands of the Applicant’s consultation and each of these issues has been carefully considered by the project team. In many cases the issues raised have influenced the consultation process itself, the EIA and the ES, and/or the other DCO application documents. These have, in turn, shaped the development of the final project proposals.
659. Significant decisions and project refinements have been made as a result of feedback on the proposals. The strategic decision to deliver the project through the adoption

of HVDC transmission technology has resulted in enhanced embedded mitigation into the project, thereby responding to many concerns expressed by consultees (including, but not limited to, eliminating the need for a CRS and resulting in a narrower 45 m cable corridor). The reduced cable corridor width allowed further flexibility to route the corridor around sensitive features and was changed in a number of areas as a result of feedback from consultees and landowners.

- 660. The use of long HDD at landfall, as well as additional trenchless crossings (including HDD) have been included in the final proposals to avoid disruption to sensitive sites and was as a result of feedback to the consultation undertaken.
- 661. The HVDC onshore project substation at Necton will have enhanced mitigation planting based on technical and local community feedback and construction traffic management has been refined to ensure that no construction traffic accesses the site via Necton or Ivy Todd.
- 662. The Applicant will continue to provide information and maintain ongoing communication with the local communities and stakeholders through the period following submission of the application to PINS. This will be through further community newsletters, updates to the project website, and via the project information line and direct project email.

27. FINAL STATEMENT OF COMPLIANCE

Table 27.1 Full Statement of Compliance

Ref	Requirement	Compliance
Planning Act 2008		
Section 42	Duty to consult The applicant must consult the following about the proposed application:	
	(a) such persons as may be prescribed;	The Applicant consulted all relevant persons prescribed under the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (see Appendix 19.1 for the full list).
	(aa) the Marine Management Organisation;	The Applicant consulted with the Marine Management Organisation.
	(b) each local authority that is within Section 43;	The Applicant consulted with each local authority identified under Section 43 (see Chapter 19.3 of the Consultation Report for the full list).
	(c) the Greater London Authority if the land is in Greater London; and	<i>Not applicable.</i>
	(d) each person who is within one or more of the categories set out in Section 44.	The Applicant consulted all persons identified under Section 44, being persons with a relevant interest in land affected by the project (see the Book of Reference for the full list).
Section 45	Timetable for consultation under Section 42	All consultees were informed of the deadline for responses in a cover letter notifying the commencement of consultation (see copy letter at Appendix 19.15. The letter stated that the consultation process would run from 7 th November 2017 until 11 th December 2017.
	(1) The applicant must, when consulting a person under Section 42, notify the person of the deadline for the receipt by the applicant of the person's response to the consultation.	
	(2) A deadline notified under subsection (1) must not be earlier	The consultation ran from 7 th November 2017 until 11 th December 2017, providing a period of 34 days for responses.

Ref	Requirement	Compliance
	<p>than the end of the period of 28 days that begins with the day after the day on which the person receives the consultation documents.</p>	
	<p>(3) In subsection (2) “the consultation documents” means the documents supplied to the person by the applicant for the purpose of consulting the person.</p>	<p>The consultation documents provided for the Section 42 consultation included a copy of the Preliminary Environmental Information Report (PEIR), plans, a PEIR Non-Technical Summary Document, a Consultation Summary Document, and a copy of the questionnaire on a USB stick. A hard copy of the Section 48 notification was also included alongside a cover letter.</p>
<p>Section 46</p>	<p>Duty to notify Secretary of State of proposed application</p> <p>(1) The applicant must supply the Secretary of State with such information in relation to the proposed application as the applicant would supply to the Secretary of State for the purpose of complying with section 42 if the applicant were required by that section to consult the Secretary of State about the proposed application.</p>	<p>The Applicant notified PINS of the proposed application on 26th October 2017 by way of a formal cover letter and package including the consultation documents. See Appendix 19.13.</p>
	<p>(2) The applicant must comply with subsection (1) on or before commencing</p>	<p>The package was sent to PINS on 26th October 2017, before the date of commencement of the formal consultation on 7th November 2017.</p>

Ref	Requirement	Compliance
	consultation under section 42.	
Section 47	<p>Duty to consult local community</p> <p>(1) The applicant must prepare a statement setting out how the applicant proposes to consult, about the proposed application, people living in the vicinity of the land.</p> <p>(2) Before preparing the statement, the applicant must consult each local authority that is within section 43(1) about what is to be in the statement.</p> <p>(3) The deadline for the receipt by the applicant of a local authority's response to consultation under subsection (2) is the end of the period of 28 days that begins with the day after the day on which the local authority receives the consultation documents.</p> <p>(4) In subsection (3) "the consultation documents" means the documents supplied to the local authority by the</p>	<p>The Applicant prepared a draft Statement of Community Consultation (SoCC) which set out how the Applicant proposed to consult the community. Further details on the process for preparing the SoCC can be found in Section 20.3 of the Consultation Report. The SoCC is attached to the Consultation Report at Appendix 20.1.</p> <p>The Applicant consulted with the following section 43 local authorities:</p> <ul style="list-style-type: none"> • North Norfolk District Council • Broadland District Council • Breckland District Council • The Broads Authority • Norfolk County Council • Marine Management Organisation (MMO) • Norwich City Council • Great Yarmouth Borough Council <p>Statutory consultation with the relevant local authorities on the SoCC ran from 27th September 2017 to 6th October 2017.</p> <p>The consultation documents comprised a cover letter (email), and draft SoCC (see Appendix 20.15).</p>

Ref	Requirement	Compliance										
	applicant for the purpose of consulting the local authority under subsection (2).											
	(5) In preparing the statement, the applicant must have regard to any response to consultation under subsection (2) that is received by the applicant before the deadline imposed by subsection (3).	<p>The Applicant considered all relevant comments received on the draft SoCC. For more information on how comments were addressed see Chapter 20.3 of the Consultation Report.</p> <p>A table outlining the changes made to the SoCC following consultation is included in Chapter 20.3.</p>										
	<p>(6) Once the applicant has prepared the statement, the applicant must—</p> <p>(a) make the statement available for inspection by the public in a way that is reasonably convenient for people living in the vicinity of the land,</p> <p>(b) publish, in a newspaper circulating in the vicinity of the land, a notice stating where and when the statement can be inspected, and</p> <p>(c) publish the statement in</p>	<p>Notice of the SoCC was published in the Eastern Daily Press on 16th October 2017. The SoCC was also made available on the Applicant's website, www.vattenfall.co.uk/norfolkvanguard. Hard copies were placed on deposit at the following locations:</p> <table border="1" data-bbox="715 1088 1353 2031"> <thead> <tr> <th data-bbox="715 1088 1066 1171">Venue Address</th> <th data-bbox="1066 1088 1353 1171">Opening Times</th> </tr> </thead> <tbody> <tr> <td data-bbox="715 1171 1066 1518"> Aylsham Library 7 Hungate St, Aylsham, Norwich, NR11 6AA </td> <td data-bbox="1066 1171 1353 1518"> Mon and Fri: 9.30am-12.30pm; 1.30-7:00pm Tues and Thurs: 9.30am-12.30pm; 1.30-5:00pm Wed: 1.30-7:00pm Sat: 9.30am-4:00pm Sun: 11:00am-2:00pm </td> </tr> <tr> <td data-bbox="715 1518 1066 1753"> Dereham Library* 59 High St, Dereham, NR19 1DZ </td> <td data-bbox="1066 1518 1353 1753"> Mon, Wed and Thurs: 9.15am-5:00pm Tues and Fri: 9.15am-7:00pm Sat: 9.15am-4:00pm </td> </tr> <tr> <td data-bbox="715 1753 1066 1939"> Norwich Millennium Library The Forum, Millennium Plain, Norwich, NR2 1AW </td> <td data-bbox="1066 1753 1353 1939"> Mon-Fri: 10:00am-7:00pm Sat: 9:00am-5:00pm </td> </tr> <tr> <td data-bbox="715 1939 1066 2031"> North Walsham Library* </td> <td data-bbox="1066 1939 1353 2031"> Mon and Thurs: 9:30am-7:30pm </td> </tr> </tbody> </table>	Venue Address	Opening Times	Aylsham Library 7 Hungate St, Aylsham, Norwich, NR11 6AA	Mon and Fri: 9.30am-12.30pm; 1.30-7:00pm Tues and Thurs: 9.30am-12.30pm; 1.30-5:00pm Wed: 1.30-7:00pm Sat: 9.30am-4:00pm Sun: 11:00am-2:00pm	Dereham Library* 59 High St, Dereham, NR19 1DZ	Mon, Wed and Thurs: 9.15am-5:00pm Tues and Fri: 9.15am-7:00pm Sat: 9.15am-4:00pm	Norwich Millennium Library The Forum, Millennium Plain, Norwich, NR2 1AW	Mon-Fri: 10:00am-7:00pm Sat: 9:00am-5:00pm	North Walsham Library*	Mon and Thurs: 9:30am-7:30pm
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North Walsham Library*	Mon and Thurs: 9:30am-7:30pm											

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	(7) The applicant must carry out consultation in accordance with the proposals set out in the statement.	The Applicant's consultation process was carried out in accordance with the SoCC, save for the publication of the 3D model on the project website due to technical restrictions, as explained in Section 20.4.1.3 of the Consultation Report.												
Section 48	Duty to publicise (1) The applicant must publicise the proposed application	The Applicant prepared and published a Section 48 Notice in the manner prescribed under the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009												

Ref	Requirement	Compliance
	in the prescribed manner.	(see below for more detail). The published notice is provided at Appendix 21.1).
	(2) Regulations made for the purposes of subsection (1) must, in particular, make provision for publicity under subsection (1) to include a deadline for receipt by the applicant of responses to the publicity.	The deadline was included in the Section 48 Notice as 23.59 on 11 th December 2017.

Ref	Requirement	Compliance
Section 49	<p>Duty to take account of responses to consultation and publicity</p> <p>(1) Subsection (2) applies where the applicant—</p> <p>(a) has complied with sections 42, 47 and 48, and</p> <p>(b) proposes to go ahead with making an application for an order granting development consent (whether or not in the same terms as the proposed application).</p> <p>(2) The applicant must, when deciding whether the application that the applicant is actually to make should be in the same terms as the proposed application, have regard to any relevant responses.</p>	<p>The Applicant has had regard to all relevant responses to consultation in accordance with section 42, section 47 and section 48. Please see Chapters 22, 23, 24 of the Consultation Report respectively.</p>
	<p>(3) In subsection (2) “relevant response” means—</p> <p>(a) a response from a person consulted under section 42 that is received by the applicant before the deadline imposed by section 45 in</p>	<p>Section 42 responses are considered in Chapter 22 of the Consultation Report. Appendix 22.1 also provides a detailed breakdown analysis of the comments.</p> <p>Section 47 responses are considered in Chapter 23 of the Consultation Report. Appendix 3.3 also provides a detailed breakdown analysis of the comments.</p> <p>A summary of all response is provided in Appendices 3.3 and 22.1. This has been prepared following guidance set out in PINS Advice Note 14: Compiling the Consultation Report.</p>

Ref	Requirement	Compliance
	<p>that person's case,</p> <p>(b) a response to consultation under section 47(7) that is received by the applicant before any applicable deadline imposed in accordance with the statement prepared under section 47, or</p> <p>(c) a response to publicity under section 48 that is received by the applicant before the deadline imposed in accordance with section 48(2) in relation to that publicity.</p>	
Section 50	<p>Guidance about pre-application procedure</p> <p>(1) Guidance may be issued about how to comply with the requirements of this Chapter.</p> <p>(2) Guidance under this section may be issued by the Secretary of State.</p> <p>(3) The applicant must have regard to any guidance under this section.</p>	<p>The Applicant has complied with the guidance set out in DCLG Guidance on pre-application consultation (see below). The Applicant has also had regard to the Planning Act 2008: guidance on the pre-application process; and Advice Notes prepared by the Planning Inspectorate.</p>

Ref	Requirement	Compliance
The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009		
Reg 3	<p>Prescribed consultees</p> <p>The persons prescribed for the purposes of section 42(a) (duty to consult) are those listed in column 1 of the table in Schedule 1 to these Regulations, who must be consulted in the circumstances specified in relation to each such person in column 2 of that table.</p>	<p>The Applicant consulted all relevant persons prescribed under the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 who were deemed to be relevant to this current application by the descriptions set out in column 2 of that table (see Appendix 19.1 of the Consultation Report for the full list).</p>
Reg 4	<p>(2) The applicant must publish a notice, which must include the matters prescribed by paragraph (3) of this regulation, of the proposed application—</p> <p>(a) for at least two successive weeks in one or more local newspapers circulating in the vicinity in which the proposed development would be situated;</p> <p>(b) once in a national newspaper;</p> <p>(c) once in the London Gazette and, if land in Scotland is affected, the Edinburgh Gazette; and</p>	<p>The Applicant published the Section 48 Notice as follows:</p> <p>(a) For two successive weeks in the Eastern Daily Press (local newspaper) during the weeks commencing 30th October 2017 and 6th November 2017;</p> <p>(b) Once in a national newspaper (The Times) on 30th October 2017.</p> <p>(c) Once in London Gazette on 31st October 2017</p> <p>(d) Once in Lloyd’s List on 30th October 2017</p> <p>(e) Once in Fishing News on 2nd November 2017</p> <p>The copies of the newspaper notices are provided at document 1.3, and also Appendix 21.2</p>

Ref	Requirement	Compliance
	<p>(d) where the proposed application relates to offshore development—</p> <p>(i) once in Lloyd’s List; and</p> <p>(ii) once in an appropriate fishing trade journal.</p>	
	<p>(3) The matters which the notice must include are:</p>	<p>The Section 48 Notice included all of the elements listed under Regulation 4(3).</p>
	<p>(a) the name and address of the applicant;</p>	<p>The name and address of the Applicant were included as per below:</p> <p><i>‘Notice is hereby given that Norfolk Vanguard Ltd. (the “Applicant”) of First Floor, 1 Tudor Street, London, EC4Y 0AH proposes to apply to the Secretary of State under section 37 of The Planning Act 2008 for the above mentioned development consent order (the “Application”).’</i></p> <p>The full Notice can be viewed in Appendix 21.1.</p>
	<p>(b) a statement that the applicant intends to make an application for development consent to the Secretary of State;</p>	<p>The section 48 Notice states that the developer proposes to apply to the Secretary of State under section 37 of the Planning Act 2008 for the DCO. As noted above, the following wording was included on the notice:</p> <p><i>‘Notice is hereby given that Norfolk Vanguard Ltd. (the “Applicant”) of First Floor, 1 Tudor Street, London, EC4Y 0AH proposes to apply to the Secretary of State under section 37 of The Planning Act 2008 for the above mentioned development consent order (the “Application”).’</i></p> <p>The full Notice can be viewed in 21.1.</p>
	<p>(c) a statement as to whether the application is EIA development;</p>	<p>The section 48 Notice states that the project is a development requiring environmental impact assessment. The Notice includes the following wording:</p> <p><i>‘The Project is an Environmental Impact Assessment (EIA) development. Accordingly, the Applicant will be making a</i></p>

Ref	Requirement	Compliance
		<p><i>Preliminary Environmental Information Report (PEIR) available during the consultation period.'</i></p> <p>The full Notice can be viewed in 21.1.</p>
	<p>(d) a summary of the main proposals, specifying the location or route of the proposed development;</p>	<p>The Section 48 Notice states that the proposed DCO would, amongst other things, authorise:</p> <ol style="list-style-type: none"> 1. Between 90-257 wind turbine generators ("WTGs"), each with a capacity of between 7-20MW, a maximum turbine hub height of 198.5m, a maximum rotor diameter of 303m and a maximum tip height of 350; 2. Offshore Substation Platforms ("OSPs") – up to three OSPs, which may employ either high voltage alternating current ("HVAC") or high voltage direct current ("HVDC") technology (see below); 3. Offshore Accommodation Platforms ("OAPs") or Offshore Accommodation Vessels ("OAV"); 4. Foundations for the WTGs and OSPs – either, or a combination of, monopile, jackets on pin piles, jackets on suction caissons, gravity base structure or floating foundations; 5. Up to 514km array 66kV cables; 6. Up to 640 km offshore export cables from the OSPs to the shore; 7. Scour protection, as required for foundations and cables; and 8. Up to two meteorological masts, a number of guard buoys and monitoring equipment. <p>Two different electrical connection options are proposed; HVAC or HVDC. The decision as to which option would be used for the project would be agreed following grant of a DCO and would depend on availability, technical considerations and cost.</p> <p>The onshore project area would be from the point at which the offshore cables come ashore ('the landfall') at Happisburgh South, Norfolk, to the existing Necton 400kV National Grid Substation. The cable corridor length from landfall to the substation is approximately 60 km.</p>

Ref	Requirement	Compliance
		<p>The key onshore components would, amongst other things, comprise the following:</p> <ol style="list-style-type: none"> 1. Landfall site to bring ashore the offshore cables and connect to the onshore cables requiring up to six transition pits; 2. If HVAC - Up to 18 no. onshore underground cables within separate ducts in six separate trenches (i.e. three cables per trench) and up to six fibre optic cables (i.e. 1 per trench); 3. If HVDC – up to four onshore cables each in separate ducts in two trenches (i.e. two cables per trench) and up to two fibre optic cables (i.e. 1 per trench); 4. Onshore cable corridor, within which onshore export cables, including for the Norfolk Boreas Offshore Wind Farm project, will be laid within cable ducts; 5. Link boxes and jointing pits at intervals along the cable route; 6. Trenchless crossings (for example horizontal directional drilling, cable bridges or other trenchless methods) at some roads, railways and sensitive habitats; 7. Cable relay station (only required under the HVAC electrical solution); 8. Onshore project substation in proximity to the grid connection location at the existing Necton 400kV National Grid Substation; 9. Modification of the existing overhead line network in the vicinity of the Necton 400kV National Grid substation; 10. Extension to Necton 400kV National Grid Substation; 11. Up to 12 no. 400kV underground interface cables between the new onshore substation and the existing 400kV National Grid Substation near Necton; 12. Temporary construction areas and access roads; 13. Planting to provide screening for permanent infrastructure; 14. The permanent and/or temporary compulsory acquisition (if required) of land and/or rights for the proposed project; 15. Overriding of easements and other rights over or affecting land for the proposed project; 16. The application and/or disapplication of legislation relevant to the proposed project including inter alia legislation relating to compulsory purchase; and

Ref	Requirement	Compliance												
		<p>17. Such ancillary, incidental and consequential provisions, permits or consents as are necessary and/or convenient.</p> <p>The full Notice can be viewed in Appendix 21.1.</p>												
	<p>(e) a statement that the documents, plans and maps showing the nature and location of the proposed development are available for inspection free of charge at the places (including at least one address in the vicinity of the proposed development) and times set out in the notice;</p>	<p>The Section 48 Notice states that copies of the details of the proposals, environmental reports, plans, maps and other documents may be inspected free of charge from 30th October 2017 until at least 11th December 2017 at the following locations and times:</p> <table border="1" data-bbox="715 696 1353 2022"> <thead> <tr> <th data-bbox="715 696 1046 779">Venue Address</th> <th data-bbox="1046 696 1353 779">Opening Times</th> </tr> </thead> <tbody> <tr> <td data-bbox="715 779 1046 1093"> Aylsham Library 7 Hungate St, Aylsham, Norwich, NR11 6AA </td> <td data-bbox="1046 779 1353 1093"> Mon and Fri: 9.30am-12.30pm; 1.30-7:00pm Tues and Thurs: 9.30am-12.30pm; 1.30-5:00pm Wed: 1.30-7:00pm Sat: 9.30am-4:00pm Sun: 11:00am-2:00pm </td> </tr> <tr> <td data-bbox="715 1093 1046 1328"> Dereham Library* 59 High St, Dereham, NR19 1DZ </td> <td data-bbox="1046 1093 1353 1328"> Mon, Wed and Thurs: 9.15am-5:00pm Tues and Fri: 9.15am-7:00pm Sat: 9.15am-4:00pm </td> </tr> <tr> <td data-bbox="715 1328 1046 1552"> Norwich Millennium Library The Forum, Millennium Plain, Norwich, NR2 1AW </td> <td data-bbox="1046 1328 1353 1552"> Mon-Fri: 10:00am-7:00pm Sat: 9:00am-5:00pm </td> </tr> <tr> <td data-bbox="715 1552 1046 1821"> North Walsham Library* New Rd, North Walsham, NR28 9DE </td> <td data-bbox="1046 1552 1353 1821"> Mon and Thurs: 9:30am-7:30pm Tues and Fri: 9:30am-5:00pm Wed and Sat: 9:30am-1:00pm </td> </tr> <tr> <td data-bbox="715 1821 1046 2022"> North Norfolk District Council </td> <td data-bbox="1046 1821 1353 2022"> Mon, Tues and Thurs: 8:30am-5:00pm Wed: 10:00am-5:00pm Fri: 8:30am-4:30pm </td> </tr> </tbody> </table>	Venue Address	Opening Times	Aylsham Library 7 Hungate St, Aylsham, Norwich, NR11 6AA	Mon and Fri: 9.30am-12.30pm; 1.30-7:00pm Tues and Thurs: 9.30am-12.30pm; 1.30-5:00pm Wed: 1.30-7:00pm Sat: 9.30am-4:00pm Sun: 11:00am-2:00pm	Dereham Library* 59 High St, Dereham, NR19 1DZ	Mon, Wed and Thurs: 9.15am-5:00pm Tues and Fri: 9.15am-7:00pm Sat: 9.15am-4:00pm	Norwich Millennium Library The Forum, Millennium Plain, Norwich, NR2 1AW	Mon-Fri: 10:00am-7:00pm Sat: 9:00am-5:00pm	North Walsham Library* New Rd, North Walsham, NR28 9DE	Mon and Thurs: 9:30am-7:30pm Tues and Fri: 9:30am-5:00pm Wed and Sat: 9:30am-1:00pm	North Norfolk District Council	Mon, Tues and Thurs: 8:30am-5:00pm Wed: 10:00am-5:00pm Fri: 8:30am-4:30pm
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	(f) the latest date on which those documents, plans and maps will be available for inspection (being a date not earlier than the deadline in subparagraph (i));	<p data-bbox="644 1552 1331 1693">The Section 48 Notice states that copies of the details of the proposals, environmental reports, plans, maps and other documents may be inspected free of charge from 30th October 2017 until at least 11th December 2017.</p> <p data-bbox="644 1715 895 1744">The Notice states that:</p> <p data-bbox="644 1767 1362 1982"><i>'Electronic copies of the PEIR, which comprises a detailed set of documents, including maps, figures, and photomontages describing the Project, as well as a set of plans showing the overall location of the Project and a much shorter non-technical summary (NTS) and consultation document, may be accessed and are available to view free of charge for inspection from</i></p>											

Ref	Requirement	Compliance
		<p><i>30th October 2017 to Monday 11th December 2017 at the listed locations...'</i></p> <p>The full Notice can be viewed in 21.1.</p>
	<p>(g) whether a charge will be made for copies of any of the documents, plans or maps and the amount of any charge;</p>	<p>The Section 48 Notice states that a reasonable copying charge may apply, up to a maximum of £1,075 for the full suite of documents. There was no charge for an electronic copy on USB. All documents could also be downloaded from the project website. The Notice states that:</p> <p><i>'Electronic copies of the PEIR and NTS can also be viewed or downloaded from the Project website www.vattenfall.co.uk/norfolkvanguard. Where a copy of the documents is requested from the Applicant, this can be provided free of charge on a USB device. The documents can be made available in hard copy format on request at a cost of:</i></p> <ul style="list-style-type: none"> • <i>Non-Technical Summary of Preliminary Environmental Information – £22</i> • <i>Full Preliminary Environmental Information Report with annexes – £1038</i> • <i>A set of 18 no. (A4) Indicative Cable Corridor Plans - £15'</i> <p>The full Notice can be viewed in Appendix 21.1.</p>
	<p>(h) details of how to respond to the publicity; and</p>	<p>The Section 48 Notice states that:</p> <p><i>Any response or representation in respect of the proposed DCO must i) be received by the Applicant before 11.59 pm on 11th December 2017 ii) state in writing the grounds of the response or representation, iii) indicate who is making the response and representation, and iv) include an address to which correspondence relating to the response or representations may be sent:</i></p> <ul style="list-style-type: none"> • <i>Addressed to: Norfolk Vanguard, The Union Building, 51-59 Rose Lane, Norwich, NR1 1BY</i> • <i>By email to: info@norfolkvanguard.co.uk</i> • <i>Through completion of a consultation questionnaire available at public events noted above, drop-in locations (also noted above), and on the project website www.vattenfall.co.uk/norfolkvanguard</i>
	<p>(i) a deadline for receipt of those responses by the applicant, being not less than 28</p>	<p>The deadline for receipt of responses by the developer was given as: <i>'before 11.59pm on the 11th December 2017'.</i></p>

Ref	Requirement	Compliance
	<p>days following the date when the notice is last published.</p>	
<p>The Infrastructure Planning (Environmental Impact Assessment) Regulations 2009</p>		
<p>Reg 6</p>	<p>Procedure for establishing whether environmental impact assessment is required</p> <p>(1) A person who proposes to make an application for an order granting development consent must, before carrying out consultation under section 42 (duty to consult) either—</p> <p>(a) request the Secretary of State to adopt a screening opinion in respect of the development to which the application relates; or</p> <p>(b) notify the Secretary of State in writing that the person proposes to provide an environmental statement in respect of that development.</p>	<p>The Applicant applied to PINS on 3rd October 2016 for a scoping opinion for the proposed development.</p> <p>The scoping opinion is provided in document 6.4.</p>
	<p>(3) A request or notification under</p>	<p>The Applicant supplied PINS with the relevant information, including:</p> <ul style="list-style-type: none"> • A covering letter

Ref	Requirement	Compliance
	<p>paragraph (1) must be accompanied by—</p> <p>(a) a plan sufficient to identify the land;</p> <p>(b) a brief description of the nature and purpose of the development and of its possible effects on the environment;</p> <p>(c) such other information or representations as the person making the request may wish to provide or make.</p>	<ul style="list-style-type: none"> Norfolk Vanguard Scoping Report (October 3rd 2016), which included the items listed under Regulation 6(3).
Reg 10	<p>Consultation statement requirements</p> <p>The consultation statement prepared under section 47 (duty to consult local community) must set out —</p> <p>(a) whether the development for which the applicant proposes to make an application for an order granting development consent is EIA development; and</p>	<p>The Applicant stated in page 9, Section 6 of the SoCC that:</p> <p>‘The project is classified as an Environmental Impact Assessment development under Schedule 1 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009.</p> <p>This means that an Environmental Statement, describing the environmental effects of the project, must be prepared to accompany the DCO application.</p> <p>The Environmental Statement will identify likely significant environmental effects of the project and any mitigation proposed to reduce those impacts. In advance of preparation of the Environmental Statement a report containing 'Preliminary Environmental Information' (PEIR) will be provided as part of the formal consultation process, which will set out the preliminary findings from the Environmental Impact Assessment process.’</p>

Ref	Requirement	Compliance
	<p>(b) if that development is EIA development, how the applicant intends to publicise and consult on the preliminary environmental information.</p>	
<p>Reg 11</p>	<p>Pre-application publicity under section 48 (duty to publicise)</p> <p>Where the proposed application for an order granting development consent is an application for EIA development, the applicant must, at the same time as publishing notice of the proposed application under section 48(1), send a copy of that notice to the consultation bodies and to any person notified to the applicant in accordance with regulation 9(1)(c).</p>	<p>A copy of the section 48 notice was issued by post to all section 42 consultees alongside the consultation documents on 27th October 2017.</p>
<p>The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017</p>		
<p>8(3)</p>	<p>(3) A person making a request under paragraph (1)(a) must provide the following information—</p> <p>(a) a plan sufficient to identify the land;</p> <p>(b) a description of the development, including in particular—</p> <p>(i) a description of the physical characteristics of</p>	<p>Although these regulations post-date the notification to the Secretary of State on 3 October 2016, the additional requirements in the 2017 EIA Regulations in 8(3)(b)(i) and (ii), and (d) were included within the original notification and scoping request in October 2016.</p>

Ref	Requirement	Compliance
	<p>the whole development and, where relevant, of demolition works;</p> <p>(ii) a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;</p> <p>(c) a description of the aspects of the environment likely to be significantly affected by the development; and</p> <p>(d) to the extent the information is available, a description of any likely significant effects of the development on the environment resulting from—</p> <p>(i) the expected residues and emissions and the production of waste, where relevant; and</p> <p>(ii) the use of natural resources, in particular soil, land, water and biodiversity.</p>	
<p>DCLG: Guidance on the pre-application process (March 2015)</p>		
17	<p>When circulating consultation documents, developers should be clear about their status, for example ensuring it is clear to the public if a document is purely for purposes of consultation.</p>	<p>Consultation Documents were all identified as such either within the title of the document (e.g. Consultation Summary Document), or within the body of the text contained with the document.</p>

Ref	Requirement	Compliance
18	<p>Early involvement of local communities, local authorities and statutory consultees can bring about significant benefits for all parties, by:</p> <ul style="list-style-type: none"> • helping the applicant identify and resolve issues at the earliest stage, which can reduce the overall risk to the project further down the line as it becomes more difficult to make changes once an application has been submitted; • enabling members of the public to influence proposed projects, feedback on potential options, and encouraging the community to help shape the proposal to maximise local benefits and minimise any downsides; • helping local people understand the potential nature and local impact of the proposed project, with the potential to dispel misapprehensions at an early stage; • enabling applicants to obtain important information about the economic, social and environmental impacts of a scheme from consultees, which can help rule out unsuitable options; 	<p>The Applicant undertook significant informal consultation, beginning in 2016, prior to the statutory consultation period in November/December 2017.</p> <p>Two main phases of early consultation (Phase I and Phase II) were undertaken with local communities in order to help inform the development of the proposals, and the refinement of key elements of the project (such as landfall location, and the cable route corridor) prior to the formal consultation period.</p> <p>In addition to informal consultation, ongoing community engagement and liaison was undertaken with communities in Norfolk, including harder to reach groups (e.g. young people). This engagement served to assist in informing communities about the project, as well as encourage participation in the process. It also allowed the Applicant to consider ways in which local benefit could be identified for the region and affected communities.</p> <p>Further information on the Applicant’s approach to this can be found in Chapter 16 of the Consultation Report.</p>

Ref	Requirement	Compliance
	<ul style="list-style-type: none"> • enabling potential mitigating measures to be considered and, if appropriate, built into the project before an application is submitted; and • identifying ways in which the project could, without significant costs to promoters, support wider strategic or local objectives. 	
20	<p>Experience suggests that, to be of most value, consultation should be:</p> <ul style="list-style-type: none"> • based on accurate information that gives consultees a clear view of what is proposed including any options; • shared at an early enough stage so that the proposal can still be influenced, while being sufficiently developed to provide some detail on what is being proposed; and • engaging and accessible in style, encouraging consultees to react and offer their views. 	<p>The Applicant has sought to provide and consult upon clear information at key points through the development of the proposals. The informal consultation undertaken was shaped around sharing and seeking feedback at key milestones in the project development. The Applicant decided to undertake various rounds ('Phases') of informal consultation to ensure that consultees had adequate opportunities to obtain a clear view of what is proposed.</p> <p>Consultation documents (such as the Consultation Summary Document) were produced to supplement the technical documents during the consultation process. All consultation materials were designed to provide accessible information to encourage participation in the process.</p>
24	<p>Government recognises that major infrastructure projects and the communities and environment in which they are located will vary considerably. A 'one-size-fits-all' approach is not, therefore, appropriate.</p>	<p>The Applicant has worked closely with relevant local authorities throughout the process. This includes during the development of the SoCC, which was developed following discussion with relevant local authorities following the earlier stages of informal consultation.</p> <p>Changes were made to the consultation process after each stage of informal consultation so that engagement mechanisms and</p>

Ref	Requirement	Compliance
	<p>Instead, applicants, who are best placed to understand the detail of their specific project, and the relevant local authorities, who have a unique knowledge of their local communities, should as far as possible work together to develop plans for consultation. The aim should be to ensure that consultation is appropriate to the scale and nature of the project and where its impacts will be experienced.</p>	<p>materials were refined and enhanced during the course of development.</p>
25	<p>Consultation should be thorough, effective and proportionate. Some applicants may have their own distinct approaches to consultation, perhaps drawing on their own or relevant sector experience, for example if there are industry protocols that can be adapted. Larger, more complex applications are likely to need to go beyond the statutory minimum timescales laid down in the Planning Act to ensure enough time for consultees to understand project proposals and formulate a response. Many proposals will require detailed technical input, especially regarding impacts, so sufficient time will need to be allowed for this. Consultation should also be sufficiently flexible to respond to the needs and requirements of</p>	<p>The formal consultation period was 34 days, which is longer than the statutory minimum. At the request of the local authorities, arrangements were made to ensure they and other S42 Consultees were issued USB sticks containing the PEI documents on the 27th October 2017, and hard copy and digital copy PEI documents were available for reference from the 1st November – this provided an additional week for review of the PEI, over and above the 34 days of statutory consultation.</p> <p>Where requested, extensions to this timeframe were granted to allow consultees to respond adequately. See Section 19.5 for more information.</p> <p>Ongoing engagement and preparation for the statutory consultation period was undertaken to prepare consultees for the process as far as possible. Informal consultation also allowed consultees an opportunity to be involved and understand the project prior to the statutory consultation period.</p>

Ref	Requirement	Compliance
	<p>consultees, for example where a consultee has indicated that they would prefer to be consulted via email only, this should be accommodated as far as possible.</p>	
26	<p>In addition, applicants may also wish to strengthen their case by seeking the views of other people who are not statutory consultees, but who may be significantly affected by the project.</p>	<p>Additional consultees were invited to participate in the statutory consultation. These were included in the section 42 mailing and are included in 19.1.</p>
27	<p>Where an applicant proposes to include non-planning consents within their Development Consent Order, the bodies that would normally be responsible for granting these consents should make every effort to facilitate this. They should only object to the inclusion of such non planning consents with good reason, and after careful consideration of reasonable alternatives. It is therefore important that such bodies are consulted at an early stage. In addition, there will be a range of national and other interest groups who could make an important contribution during consultation. Applicants are therefore encouraged to consult widely on project proposals.</p>	<p>The Applicant is not seeking any non-planning consents for this project.</p>

Ref	Requirement	Compliance
28	<p>From time to time a body may cease to exist but, for legislative timetabling reasons, may still be listed as a statutory consultee. In such situations the Secretary of State will not expect strict compliance with the statutory requirements. Applicants should identify any successor body and consult with them in the same manner as they would have with the original body. Where there is no obvious successor, applicants should seek the advice of the Inspectorate, who may be able to identify an appropriate alternative consultee. Whether or not an alternative is identified, the consultation report should briefly note any cases where compliance with statutory requirements was impossible and the reasons why.</p>	<p>The Applicant reviewed the consultee list on a regular basis to ensure that contact details were up to date.</p>
29	<p>Applicants will often need detailed technical input from expert bodies to assist with identifying and mitigating the social, environmental, design and economic impacts of projects, and other important matters. Technical expert input will often be needed in advance of formal compliance with the pre-application requirements. Early engagement with</p>	<p>The Applicant has undertaken extensive engagement with expert bodies and technical consultees throughout the pre-application process. This ongoing dialogue began in Phase 0, prior to Scoping.</p> <p>The Evidence Plan Process (EPP) was designed to bring together key consultees at an early stage to create a vehicle through which to provide information and ensure that relevant expert bodies understand the key project information, timeframes and consultation requirements. This is described in detail in Chapter 9 of the Consultation Report.</p>

Ref	Requirement	Compliance
	<p>these bodies can help avoid unnecessary delays and the costs of having to make changes at later stages of the process. It is equally important that statutory consultees respond to a request for technical input in a timely manner. Applicants are therefore advised to discuss and agree a timetable with consultees for the provision of such inputs.</p>	
35	<p>“The applicant has a duty under section 47 of the Planning Act to prepare a Statement of Community Consultation, and then to conduct its consultation in line with that statement. Before doing so, the applicant must consult on their Statement of Community Consultation with each local authority in whose area the proposed development is situated. This may require consultation with a number of different local authorities, particularly for long linear projects.”</p>	<p>The Applicant prepared a draft Statement of Community Consultation (SoCC) which set out how the Applicant proposed to consult the community. Further details on the process for preparing the SoCC can be found in Section 20.3 of the Consultation Report. The SoCC is attached to the Consultation Report at Appendix 20.1.</p> <p>The Applicant consulted with the following section 43 local authorities:</p> <ul style="list-style-type: none"> • North Norfolk District Council • Broadland District Council • Breckland District Council • The Broads Authority • Norfolk County Council • Marine Management Organisation (MMO) • Norwich City Council • Great Yarmouth Borough Council <p>Statutory consultation with the relevant local authorities on the SoCC ran from 27th September 2017 to 6th October 2017.</p> <p>The consultation documents comprised a cover letter (email), and draft SoCC (see Appendix 20.15).</p>
36	<p>Even where it is intended that a development would take place within a single local authority area, it is possible that its impacts could be significantly wider than just that local authority’s area - for</p>	<p>Due to the nature of the project, the Applicant consulted across a wide geographic area, including all local authorities through which the proposed cable route corridor and associated infrastructure ran.</p> <p>This approach is reflected and recorded in the SoCC.</p>

Ref	Requirement	Compliance
	<p>example if the development was located close to a neighbouring authority. Where an applicant decides to consult people living in a wider area who could be affected by the project (e.g. through visual or environmental impacts, or through increased traffic flow), that intention should be reflected in the Statement of Community Consultation.</p>	
37	<p>The Planning Act requires local authorities to respond to the applicant's consultation on their proposed Statement of Community Consultation within 28 days of receipt of the request. However, prior to submitting their draft Statement of Community Consultation applicants may wish to seek to resolve any disagreements or clarifications about the public consultation design. An applicant is therefore likely to need to engage in discussions with local authorities over a longer period than the minimum requirements set out in the Act.</p>	<p>Chapter 20.3 of the Consultation Report sets out how the Applicant consulted with relevant local authorities on the consultation approach and development of the SoCC. Extensive discussion on this point took place prior to the formal Draft SoCC consultation period.</p>
39	<p>Topics for consideration at such pre-consultation discussions might include:</p> <ul style="list-style-type: none"> • the size and coverage of the proposed consultation exercise 	<p>Chapter 20.3 of the Consultation Report sets out how the Applicant consulted with relevant local authorities on the consultation approach and development of the SoCC.</p>

Ref	Requirement	Compliance
	<p>(including, where appropriate, consultation which goes wider than one local authority area);</p> <ul style="list-style-type: none"> • the appropriateness of various consultation techniques, including electronic-based ones; • the design and format of consultation materials; • issues which could be covered in consultation materials; • suggestions for places/timings of public events as part of the consultation; • local bodies and representative groups who should be consulted; and • timescales for consultation. 	
41	<p>Where a local authority raises an issue or concern on the Statement of Community Consultation which the applicant feels unable to address, the applicant is advised to explain in their consultation report their course of action to the Secretary of State when they submit their application.</p>	<p>Chapter 20.3 of the Consultation Report sets out how the Applicant consulted with relevant local authorities on the consultation approach and development of the SoCC. Table 20.2 in the Report shows requested amendments to the SoCC wording, as well as whether or not these changes were adopted. The Applicant had regard to all responses received and made amendments to the wording of the SoCC in response to the majority of requested changes. Where changes were not made, this has been clearly and directly responded to by the Applicant.</p>
42	<p>Where a local authority decides that it does not wish to respond to a consultation request on the Statement of Community Consultation, the applicant</p>	<p>The Applicant is satisfied that it has made reasonable efforts to consult with all those who may have a legitimate interest or might be affected by the proposed development. In addition, significant local community engagement via the LLO, and in conjunction with parish and town councils has taken place throughout the process in order to raise the profile of the project</p>

Ref	Requirement	Compliance
	<p>should make reasonable efforts to ensure that all affected communities are consulted. If the applicant is unsure how to proceed, they are encouraged to seek advice from the Inspectorate. However, it is for the applicant to satisfy themselves that their consultation plan allows for as full public involvement as is appropriate for their project and, once satisfied, to proceed with the consultation. Provided that applicants can satisfy themselves that they have made reasonable endeavours to consult with all those who might have a legitimate interest or might be affected by a proposed development, it would be unlikely that their application would be rejected on grounds of inadequate public consultation.</p>	<p>and encourage participation in the consultation process. This engagement and feedback from informal consultation phases fed into the development of the consultation process as outlined in the SoCC.</p>
43	<p>Local authorities are also themselves statutory consultees for any proposed major infrastructure project which is in or adjacent to their area. Applicants should engage with them as early as possible to ensure that the impacts of the development on the local area are understood and considered prior to the application being submitted to the Secretary of State.</p>	<p>The Applicant undertook early engagement with the relevant local authorities from the outset of the project development. Chapters 9 and 11 of the Consultation Report sets out the early engagement undertaken with these authorities in order to understand the most appropriate way to engage with affected local communities.</p> <p>Ongoing engagement has taken place throughout the pre-application process.</p>

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49	<p>Applicants will also need to identify and consult people who own, occupy or have another interest in the land in question, or who could be affected by a project in such a way that they may be able to make a claim for compensation. This will give such parties early notice of projects, and an opportunity to express their views regarding them</p>	<p>The Applicant consulted both informally and formally under section 42 of the 2008 Act with individuals who own, occupy or have another interest in the land in question. By engaging with land interests early in the process, the Applicant has been able to take on board a significant amount of the comments received.</p>
50	<p>It is the applicant's responsibility to demonstrate at submission of the application that due diligence has been undertaken in identifying all land interests and applicants should make every reasonable effort to ensure that the Book of Reference (which records and categorises those land interests) is up to date at the time of submission.</p>	<p>The Applicant has undertaken significant research and is satisfied that it has undertaken extensive due diligence in order to ensure that all land interests have been identified.</p> <p>The Applicant will engage with any new interests to help them understand how they can engage with the Development Consent Order process.</p> <p>A full description of all engagement with landowners is included in Chapters 10, 11, 12, 13, 17, 19 and 25 of the Consultation Report.</p>
51	<p>However, it is understood that land interests change over time and that new or additional interests may emerge after an applicant has concluded statutory consultation but just before an application is submitted. In such a situation, the applicant should provide a proportionate opportunity to any new person identified with a land interest to make their views known on the application. Where new</p>	<p>Any newly identified landowner was afforded adequate opportunity to consider and respond to the project proposals throughout the pre-application process.</p> <p>The Applicant undertook a re-consultation with newly identified landowners following the statutory consultation following a revision to a portion of the red line boundary.</p> <p>A full description of all additional engagement with landowners is included in Chapter 19 of the Consultation Report.</p> <p>There have been new land interests which have arisen following the pre-application consultation and very shortly before the application submission. Where this is the case, the applicant will engage with those parties to explain how they are able to engage with the application if it is accepted for examination.</p>

Ref	Requirement	Compliance
	<p>interests in land are identified very shortly before the intended submission of an application, despite diligent efforts earlier in the process it may be difficult at that stage for applicants to consult and take account of any responses from those new interests before submitting their application as intended. If this situation arises applicants should be proactive and helpful in ensuring that the person understands how they can, if they so wish, engage with the process if the application is accepted for examination.</p>	
52	<p>Applicants should explain in the consultation report how they have dealt with any new interests in land emerging after conclusion of their statutory consultation having regard to their duties to consult and take account of any responses.</p>	<p>Any newly identified landowner was afforded adequate opportunity to consider and respond to the project proposals throughout the pre-application process.</p> <p>The Applicant undertook a re-consultation with newly identified landowners following the statutory consultation following a revision to a portion of the red line boundary.</p> <p>A full description of all additional engagement with landowners is included in Chapter 19 of the Consultation Report.</p>
53	<p>Local people have a vital role to play at the pre application stage. People should have as much influence as is realistic and possible over decisions which shape their lives and communities. It is therefore critical that they are engaged with project proposals at an early stage. Because they live, work and socialise in the affected area, local people</p>	<p>The Applicant is committed to early and meaningful consultation with local communities in the areas in which it operates. Chapter 4 and 20 sets out Vattenfall’s approach to consultation with local communities.</p>

Ref	Requirement	Compliance
	<p>are particularly well placed to comment on what the impact of proposals on their local community might be; or what mitigating measures might be appropriate; or what other opportunities might exist for meeting the project's objectives.</p>	
54	<p>In consulting on project proposals, an inclusive approach is needed to ensure that different groups have the opportunity to participate and are not disadvantaged in the process. Applicants should use a range of methods and techniques to ensure that they access all sections of the community in question. Local authorities will be able to provide advice on what works best in terms of consulting their local communities given their experience of carrying out consultations in their area.</p>	<p>The Applicant undertook 'Hard to Reach' engagement, which focused on inclusive engagement with seldom heard groups or individuals. Further information on this can be found in Section 20.6 of the Consultation Report.</p>
55	<p>Applicants must set out clearly what is being consulted on. They must be careful to make it clear to local communities what is settled and why, and what remains to be decided, so that expectations of local communities are properly managed. Applicants could prepare a short document specifically for local communities, summarising the project proposals and outlining the matters on</p>	<p>The Applicant set out the scope of consultation during the statutory consultation period in the SoCC.</p> <p>A Consultation Summary Document was produced in order to provide an accessible summary of the proposals for the local community. This document contained direct information and questions about the matters on which the views of the local communities are being sought. These questions were reflected in the consultation questionnaire.</p> <p>The SoCC was offered in alternative formats (e.g. braille, large print or audio format). Residents were encouraged to contact the project team on the information line if they had any specific requirements or queries about the consultation process or materials.</p>

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	<p>which the view of the local community is sought. This can describe core elements of the project and explain what the potential benefits and impacts may be. Such documents should be written in clear, accessible, and non-technical language. Applicants should consider making it available in formats appropriate to the needs of people with disabilities if requested. There may be cases where documents may need to be bilingual (for example, Welsh and English in some areas), but it is not the policy of the Government to encourage documents to be translated into non-native languages.</p>	
56	<p>Applicants are required to set out in their Statement of Community Consultation how they propose to consult those living in the vicinity of the land. They are encouraged to consider consulting beyond this where they think doing so may provide more information on the impacts of their proposals (e.g. through visual impacts or increased traffic flow).</p>	<p>The Applicant set out how it proposes to consult with local communities and those living within the vicinity of the land in its SoCC. This is detailed in Chapter 20 of the Consultation Report. The SoCC is included as Appendix 20.1 of the Consultation Report.</p>
57	<p>The Statement of Community Consultation should act as a framework for the community consultation generally, for example, setting out where details and dates of any events will be published.</p>	<p>The SoCC set out the details of the statutory consultation and was made available online, and at exhibitions during the statutory consultation period.</p> <p>It was sent to parish councils along the cable route corridor and made available at the below local deposit points. Chapter 20 of the Consultation Report sets this out in detail.</p>

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	<p>The Statement of Community Consultation should be made available online, at any exhibitions or other events held by applicants. It should be placed at appropriate local deposit points (e.g. libraries, council offices) and sent to local community groups as appropriate.</p>		<table border="1"> <thead> <tr> <th data-bbox="715 293 1067 383">Venue Address</th> <th data-bbox="1067 293 1369 383">Opening Times</th> </tr> </thead> <tbody> <tr> <td data-bbox="715 383 1067 689"> <p>Aylsham Library 7 Hungate St, Aylsham, Norwich, NR11 6AA</p> </td> <td data-bbox="1067 383 1369 689"> <p>Mon and Fri: 9.30am-12.30pm; 1.30-7:00pm Tues and Thurs: 9.30am-12.30pm; 1.30-5:00pm Wed: 1.30-7:00pm Sat: 9.30am-4:00pm Sun: 11:00am-2:00pm</p> </td> </tr> <tr> <td data-bbox="715 689 1067 925"> <p>Dereham Library* 59 High St, Dereham, NR19 1DZ</p> </td> <td data-bbox="1067 689 1369 925"> <p>Mon, Wed and Thurs: 9.15am-5:00pm Tues and Fri: 9.15am-7:00pm Sat: 9.15am-4:00pm</p> </td> </tr> <tr> <td data-bbox="715 925 1067 1115"> <p>Norwich Millennium Library The Forum, Millennium Plain, Norwich, NR2 1AW</p> </td> <td data-bbox="1067 925 1369 1115"> <p>Mon-Fri: 10:00am-7:00pm Sat: 9:00am-5:00pm</p> </td> </tr> <tr> <td data-bbox="715 1115 1067 1384"> <p>North Walsham Library* New Rd, North Walsham, NR28 9DE</p> </td> <td data-bbox="1067 1115 1369 1384"> <p>Mon and Thurs: 9:30am-7:30pm Tues and Fri: 9:30am-5:00pm Wed and Sat: 9:30am-1:00pm</p> </td> </tr> <tr> <td data-bbox="715 1384 1067 1608"> <p>North Norfolk District Council Council Offices, Holt Road, Cromer, NR27 9EN</p> </td> <td data-bbox="1067 1384 1369 1608"> <p>Mon, Tues and Thurs: 8:30am-5:00pm Wed: 10:00am-5:00pm Fri: 8:30am-4:30pm</p> </td> </tr> <tr> <td data-bbox="715 1608 1067 1798"> <p>Broadland District Council Thorpe Lodge, 1 Yarmouth Road, Norwich, NR7 0DU</p> </td> <td data-bbox="1067 1608 1369 1798"> <p>Mon-Fri: 8:30am-5:00pm</p> </td> </tr> <tr> <td data-bbox="715 1798 1067 1977"> <p>Breckland District Council Elizabeth House, Walpole Loke, Dereham, NR19 1EE</p> </td> <td data-bbox="1067 1798 1369 1977"> <p>Mon-Fri: 9:00am-5:00pm</p> </td> </tr> </tbody> </table>	Venue Address	Opening Times	<p>Aylsham Library 7 Hungate St, Aylsham, Norwich, NR11 6AA</p>	<p>Mon and Fri: 9.30am-12.30pm; 1.30-7:00pm Tues and Thurs: 9.30am-12.30pm; 1.30-5:00pm Wed: 1.30-7:00pm Sat: 9.30am-4:00pm Sun: 11:00am-2:00pm</p>	<p>Dereham Library* 59 High St, Dereham, NR19 1DZ</p>	<p>Mon, Wed and Thurs: 9.15am-5:00pm Tues and Fri: 9.15am-7:00pm Sat: 9.15am-4:00pm</p>	<p>Norwich Millennium Library The Forum, Millennium Plain, Norwich, NR2 1AW</p>	<p>Mon-Fri: 10:00am-7:00pm Sat: 9:00am-5:00pm</p>	<p>North Walsham Library* New Rd, North Walsham, NR28 9DE</p>	<p>Mon and Thurs: 9:30am-7:30pm Tues and Fri: 9:30am-5:00pm Wed and Sat: 9:30am-1:00pm</p>	<p>North Norfolk District Council Council Offices, Holt Road, Cromer, NR27 9EN</p>	<p>Mon, Tues and Thurs: 8:30am-5:00pm Wed: 10:00am-5:00pm Fri: 8:30am-4:30pm</p>	<p>Broadland District Council Thorpe Lodge, 1 Yarmouth Road, Norwich, NR7 0DU</p>	<p>Mon-Fri: 8:30am-5:00pm</p>	<p>Breckland District Council Elizabeth House, Walpole Loke, Dereham, NR19 1EE</p>	<p>Mon-Fri: 9:00am-5:00pm</p>
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		<p>Norwich City Council</p> <p>St Peters Street, Norwich, NR2 1NH</p>	<p>Mon-Fri: 8:45am-5:00pm</p>
		<p>Great Yarmouth Borough Council</p> <p>Town Hall, Hall Plain, Great Yarmouth, NR30 2QF</p>	<p>Mon-Fri: 9:00am-5:00pm</p>
58	<p>Applicants are required to publicise their proposed application under section 48 of the Planning Act and the Regulations¹⁵ and set out the detail of what this publicity must entail. This publicity is an integral part of the public consultation process. Where possible, the first of the two required local newspaper advertisements should coincide approximately with the beginning of the consultation with communities. However, given the detailed information required for the publicity in the Regulations, aligning publicity with consultation may not always be possible, especially where a multi-stage consultation is intended.</p>	<p>The section 48 notification was published in relevant publications on the following dates.</p> <ul style="list-style-type: none"> (a) For two successive weeks in the Eastern Daily Press (local newspaper) during the weeks commencing 30th October 2017 and 6th November 2017: (b) Once in a national newspaper (The Times) on 30th October 2017. (c) Once in London Gazette on 31st October 2017 (d) Once in Lloyd’s List on 30th October 2017 (e) Once in Fishing News on 2nd November 2017 <p>The copies of the newspaper notices are provided at document 1.3, and also Appendix 21.2.</p> <p>The beginning of the advertised consultation period was on the day following the second section 48 notification in the local paper, however all consultation documents and required information was made available from the date of the first notification, the week prior.</p>	
61	<p>Applicants have a statutory duty to consult any local authority in whose land a project is sited. So, where an offshore project also features landbased development, the applicant should treat the local</p>	<p>The Applicant has consulted with all relevant and potentially impacted local authorities throughout the process. Chapter 20 of the Consultation Report sets out the Applicant’s approach to engagement regarding the SoCC with relevant local authorities. Chapter 19 outlines how the Applicant engaged with relevant local authorities under section 42.</p>	

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	<p>authority where the land-based development is located as the main consultee for the Statement of Community Consultation. The applicant is also advised to consider seeking views on the Statement of Community Consultation from local authorities whose communities may be affected by the project, for example visually or through construction traffic, even if the project is in fact some distance from the area in question. In addition, applicants may find it beneficial to discuss their Statement of Community Consultation with any local authorities in the vicinity where there could be an effect on harbour facilities.</p>	
63	<p>Applicants should ensure they consider all the potential impacts on communities which are in the vicinity of the proposed project. These are unlikely to affect all communities to the same degree but might include potential visual, environmental, economic and social impacts.</p>	<p>The Applicant has undertaken significant informal consultation (as set out in Chapters 11 – 17 of the Consultation Report) in order to help inform the statutory consultation period and ensure that all potential impacts on communities are considered.</p>
64	<p>Where the location of a proposed offshore project is such that the impacts on communities are likely to be very small or negligible, applicants are still expected to inform relevant coastal authorities</p>	<p>The Applicant undertook wide ranging consultation with numerous communities across the potentially affected area. This include engagement and consultation events in Great Yarmouth, to ensure that relevant communities who may be affected indirectly by the proposals were afforded the opportunity to participate in the consultation. Through a series of informal</p>

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	<p>and communities of the proposed project, and give them a chance to take part in any consultation. When deciding who to consult in these situations, applicants are encouraged to think laterally, by, for example, identifying nearby local authorities with busy harbours, active fishing or sailing / water-sports communities or key local environmental groups.</p>	<p>consultation phases, the consultation process was refined. This is explained through Chapter 17 of the Consultation Report.</p>
65	<p>Where there are no obvious impacts on local communities, applicants should consult the local communities closest to the proposed project. It may be that there are impacts which are not immediately obvious but which a consultation can identify. Equally, local communities may have concerns, for example, about environmental impacts, and open engagement with the applicant will allow them the chance to express their concerns and to understand how these concerns are being addressed. The level of interest shown by local authorities and communities will dictate the degree and depth of consultation required. It may be that for certain offshore projects, the consultation process with local communities can be undertaken in a focused and proportionate way,</p>	<p>The Applicant ensured that all communities within the vicinity of any proposed development were invited to participate in the consultation process. A Primary Consultation Zone (PCZ) was created that ensured that all local residents within the vicinity of the proposed cable route corridor, and infrastructure at either end of the route were invited to provide their thoughts and feedback. This is set out in the SoCC (Appendix 20.1) and explained further in Chapter 20 of this Report.</p>

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	and therefore completed within the minimum statutory timescales required by the Planning Act.	
66	Ultimately, applicants for offshore projects should take a pragmatic approach, consulting in proportion to the impacts on communities and the size of the project, whilst ensuring that relevant local communities are kept informed about the proposals and offered the chance to participate in shaping them. Applicants should use this as a guiding principle for consultation together with the statutory requirements as set out in the Planning Act. Provided they do this, and fully explain their approach in the consultation report which accompanies their application, the expectation is that their application will not be rejected on the grounds of insufficient public consultation.	The Applicant has tailored its consultation approach throughout the informal and formal consultation phases. Specifically, where more significant potential impacts were possible (e.g. at landfall, and at the point of connection to the National Grid near Necton), additional, targeted consultation was undertaken (Phase IIb – as set out in Chapter 14 of the Consultation Report).
67	In addition to relevant local authorities and their communities, prospective applicants for development consent for certain types of projects are required to consult and engage with the Marine Management Organisation. They will also be able to advise on what, and with whom, additional consultation	The MMO was consulted throughout the process by the Applicant.

Ref	Requirement	Compliance
	<p>might be appropriate. Additional guidance is available from the Inspectorate on transboundary consultations.</p>	
68	<p>To realise the benefits of consultation on a project, it must take place at a sufficiently early stage to allow consultees a real opportunity to influence the proposals. At the same time, consultees will need sufficient information on a project to be able to recognise and understand the impacts.</p>	<p>The Applicant has involved consultees and the local community in the development of its proposals from the earliest stages. Initial consultation took place in line with the Scoping request (see Chapter 12 of the Consultation Report), and continued through numerous stages of informal and then formal consultation across 2016, 2017 and into 2018.</p>
69	<p>Applicants will often also require detailed technical advice from consultees and it is likely that their input will be of the greatest value if they are consulted when project proposals are fluid, followed up by confirmation of the approach as proposals become firmer. In principle, therefore, applicants should undertake initial consultation as soon as there is sufficient detail to allow consultees to understand the nature of the project properly.</p>	<p>The Applicant has involved consultees and the local community in the development of its proposals from the earliest stages. Initial consultation took place in line with the Scoping request (see Chapter 7 of the Consultation Report), and continued through numerous stages of informal and then formal consultation across 2016, 2017 and into 2018.</p> <p>Key milestones in the development and design of the project were all consulted upon, ensuring that the proposals were still fluid during each stage of consultation. This took place on an informal basis continually, with specific consultation periods at the following milestones:</p> <ol style="list-style-type: none"> 1. Scoping (Phase I non-statutory consultation period); 2. Cable route corridor refinement (including landfall search zones, Cable Relay Station search zones, onshore project substation search zones) (Phase II non-statutory consultation period); and 3. Preferred options for final proposals (statutory consultation period).
70	<p>To manage the tension between consulting early, but also having project</p>	<p>The Applicant undertook significant levels of informal consultation on options from an early stage. Three main phases</p>

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	<p>proposals that are firm enough to enable consultees to comment, applicants are encouraged to consider an iterative, phased consultation consisting of two (or more) stages, especially for large projects with long development periods. For example, applicants might wish to consider undertaking non-statutory early consultation at a stage where options are still being considered. This will be helpful in informing proposals and assisting the applicant in establishing a preferred option on which to undertake statutory consultation.</p>	<p>of consultation were undertaken prior to the statutory consultation (see Chapters 9 to 15 of the Consultation Report).</p> <p>Informal engagement and consultation has taken place throughout the process to ensure that consultees and local communities have adequate information at an appropriate time to influence the proposals.</p>
71	<p>Where an iterative consultation is intended, it may be advisable for applicants to carry out the final stage of consultation with persons who have an interest in the land once they have worked up their project proposals in sufficient detail to identify affected land interests.</p>	<p>The Applicant involved landowners in the consultation process from the earliest points at which it was identified that their land would fall within the redline boundary for the project.</p> <p>At the point of undertaking the statutory consultation in November and December 2017, all landowners were notified of the proposals under section 42. Further information on this can be found in Chapter 19 of the Consultation Report.</p> <p>Where changes have occurred to the red line boundary since that point, further consultation has been undertaken directly with affected or newly identified landowners to ensure that they have had an opportunity to consider the proposals and provide their feedback. Further information on this can be found in Chapter 19 of the Consultation Report.</p>
72	<p>The timing and duration of consultation will be likely to vary from project to project, depending on size and complexity, and the range and scale of the impacts. The Planning Act requires a consultation period of a minimum of 28</p>	<p>The formal consultation period was 34 days, which is longer than the statutory minimum.</p> <p>Where requested, extensions to this timeframe were granted to allow consultees to respond adequately. See Chapter 19 for more information.</p> <p>Ongoing engagement and preparation for the statutory consultation period was undertaken to prepare consultees for the process as far as possible. Informal consultation also allowed</p>

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	<p>days from the day after receipt of the consultation documents. It is expected that this may be sufficient for projects which are straightforward and uncontroversial in nature. But many projects, particularly larger or more controversial ones, may require longer consultation periods than this. Applicants should therefore set consultation deadlines that are realistic and proportionate to the proposed project. It is also important that consultees do not withhold information that might affect a project, and that they respond in good time to applicants. Where responses are not received by the deadline, the applicant is not obliged to take those responses into account.</p>	<p>consultees an opportunity to be involved and understand the project prior to the statutory consultation period.</p>
73	<p>Applicants are not expected to repeat consultation rounds set out in their Statement of Community Consultation unless the project proposals have changed very substantially. However, where proposals change to such a large degree that what is being taken forward is fundamentally different from what was consulted on, further consultation may well be needed. This may be necessary if, for example, new information</p>	<p>The Applicant has consulted upon the proposals as set out in the SoCC. The project has not altered materially since the point at which the SoCC was published, so there has been no requirement to repeat any consultation rounds.</p>

Ref	Requirement	Compliance
	<p>arises which renders all previous options unworkable or invalid for some reason. When considering the need for additional consultation, applicants should use the degree of change, the effect on the local community and the level of public interest as guiding factors.</p>	
74	<p>Where a proposed application changes to such a large degree that the proposals could be considered a new application, the legitimacy of the consultation already carried out could be questioned. In such cases, applicants should undertake further re-consultation on the new proposals, and should supply consultees with sufficient information to enable them to understand the nature of the change and any likely significant impacts (but not necessarily the full suite of consultation documents), and allow at least 28 days for consultees to respond.</p>	<p>The Applicant has consulted upon the proposals as set out in the SoCC, and at each stage of informal consultation undertaken prior to that. Refinements have been made, but the project has not altered materially through the process, so there has been no requirement to repeat any consultation rounds.</p>
75	<p>If the application only changes to a small degree, or if the change only affects part of the development, then it is not necessary for an applicant to undertake a full re-consultation. Where a proposed application is amended in light of</p>	<p>The Applicant has made changes to the proposals following consultation. These changes are set out in Chapters 22 and 24 of the Consultation Report, as well as the executive summary.</p> <p>The majority of these changes were as a result of feedback received and some affected a portion of the cable route corridor red line boundary. Where this was the case, further targeted consultation was undertaken with affected landowners and consultees (see Chapter 19 of the Consultation Report for more information).</p>

Ref	Requirement	Compliance
	<p>consultation responses then, unless those amendments materially change the application or materially changes its impacts, the amendments themselves should not trigger a need for further consultation. Instead, the applicant should ensure that all affected statutory consultees and local communities are informed of the changes.</p>	<p>Where a more significant decision or project refinement has been made (such as the decision to proceed with HVDC technology), then this was within the parameters of the identified project scope that was consulted upon. Changes as a result of this decision therefore have been adopted and communicated to consultees and the local community (see Chapter 25 of the Consultation Report for more information).</p>
76	<p>In circumstances where a particular issue has arisen during the preapplication consultation, or where it is localised in nature, it may be appropriate to hold a non-statutory, targeted consultation. A developer's Statement of Community Consultation should be drafted so that it does not preclude this approach. A more bespoke approach can be adopted, which may allow developers to respond with more agility to the issue at hand. If adopting this approach, the emphasis should be on ensuring that relevant individuals and organisations are included.</p>	<p>The Applicant has undertaken targeted consultation outside of the statutory consultation period. Workshops to discuss substation location, and Cable Relay Station search zones were undertaken in July 2017 directly in the affected local communities in order to ascertain local views and provide further information where possible (see Chapter 14 of the Consultation Report for more information).</p> <p>Landowner consultation fed into changes to the red line boundary during and following the statutory consultation.</p> <p>This is dealt with in Chapter 19 of the Consultation Report.</p> <p>Further consultation with communities potentially affected by the minor red line boundary changes post statutory consultation has also taken place, notably around Reepham and Pettywell. See Chapter 25 for further information.</p>
77	<p>Consultation should also be fair and reasonable for applicants as well as communities. To ensure that consultation is fair to all parties, applicants should be able to demonstrate that the consultation process is</p>	<p>The Applicant has refined its approach to consultation throughout the informal consultation process. For example, the majority of affected communities demonstrated that their main area of interest was related to landfall and onshore elements of the project. These areas therefore were the focus for communities during the statutory consultation. Additional venues were also arranged for drop-in events in response to local demand e.g. at Reepham and Bacton.</p>

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	<p>proportionate to the impacts of the project in the area that it affects, takes account of the anticipated level of local interest, and takes account of the views of the relevant local authorities.</p>	<p>The SoCC was also developed in line with advice from local authorities, and the formal consultation process was adapted to suit expectations.</p>										
80	<p>Therefore, the consultation report should:</p> <ul style="list-style-type: none"> - provide a general description of the consultation process undertaken, which can helpfully include a timeline; - set out specifically what the applicant has done in compliance with the requirements of the Planning Act, relevant secondary legislation, this guidance, and any relevant policies, guidance or advice published by Government or the Inspectorate; - set out how the applicant has taken account of any response to consultation with local authorities on what should be in the applicant's statement of community consultation; - set out a summary of relevant responses to consultation (but not a complete list of responses); 	<p>Vattenfall's Consultation Report has been drafted to ensure that these elements are addressed and reflected within the body of the Report. To summarise, the table below shows where this point can be found within the Consultation Report:</p> <table border="1" data-bbox="699 792 1361 1993"> <thead> <tr> <th data-bbox="699 792 1123 862">Consultation Report requirement</th> <th data-bbox="1123 792 1361 862">Chapter reference</th> </tr> </thead> <tbody> <tr> <td data-bbox="699 862 1123 1048"> <ul style="list-style-type: none"> - provide a general description of the consultation process undertaken, which can helpfully include a timeline; </td> <td data-bbox="1123 862 1361 1048">Chapter 2</td> </tr> <tr> <td data-bbox="699 1048 1123 1451"> <ul style="list-style-type: none"> - set out specifically what the applicant has done in compliance with the requirements of the Planning Act, relevant secondary legislation, this guidance, and any relevant policies, guidance or advice published by Government or the Inspectorate; </td> <td data-bbox="1123 1048 1361 1451"> Section 42 - Chapter 19 Section 47 – Chapter 20 Section 48 – Chapter 21 </td> </tr> <tr> <td data-bbox="699 1451 1123 1709"> <ul style="list-style-type: none"> - set out how the applicant has taken account of any response to consultation with local authorities on what should be in the applicant's statement of community consultation; </td> <td data-bbox="1123 1451 1361 1709">Chapter 20</td> </tr> <tr> <td data-bbox="699 1709 1123 1993"> <ul style="list-style-type: none"> - set out a summary of relevant responses to consultation (but not a complete list of responses); </td> <td data-bbox="1123 1709 1361 1993"> Section 42 - Chapter 19 Section 47 – Chapter 20 Section 48 – Chapter 21 </td> </tr> </tbody> </table>	Consultation Report requirement	Chapter reference	<ul style="list-style-type: none"> - provide a general description of the consultation process undertaken, which can helpfully include a timeline; 	Chapter 2	<ul style="list-style-type: none"> - set out specifically what the applicant has done in compliance with the requirements of the Planning Act, relevant secondary legislation, this guidance, and any relevant policies, guidance or advice published by Government or the Inspectorate; 	Section 42 - Chapter 19 Section 47 – Chapter 20 Section 48 – Chapter 21	<ul style="list-style-type: none"> - set out how the applicant has taken account of any response to consultation with local authorities on what should be in the applicant's statement of community consultation; 	Chapter 20	<ul style="list-style-type: none"> - set out a summary of relevant responses to consultation (but not a complete list of responses); 	Section 42 - Chapter 19 Section 47 – Chapter 20 Section 48 – Chapter 21
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	<ul style="list-style-type: none"> - provide a description of how the application was informed and influenced by those responses, outlining any changes made as a result and showing how significant relevant responses will be addressed; - provide an explanation as to why responses advising on major changes to a project were not followed, including advice from statutory consultees on impacts; - where the applicant has not followed the advice of the local authority or not complied with this guidance or any relevant Advice Note published by the Inspectorate, provide an explanation for the action taken or not taken; and - be expressed in terms sufficient to enable the Secretary of State to understand fully how the consultation process has been undertaken and significant effects addressed. However, it need not include full technical explanations of these matters. 		<ul style="list-style-type: none"> - provide a description of how the application was informed and influenced by those responses, outlining any changes made as a result and showing how significant relevant responses will be addressed; <p>Overview Summary: Chapter 1 Section 42 - Chapter 19 Section 47 – Chapter 20 Section 48 – Chapter 21</p>
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81	It is good practice that those who have contributed to the consultation are informed		The Applicant has sought to provide consultees, local communities and anyone with an interest in the proposals with information throughout the process.

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	<p>of the results of the consultation exercise; how the information received by applicants has been used to shape and influence the project; and how any outstanding issues will be addressed before an application is submitted to the Inspectorate.</p>	<p>After each stage of informal and formal consultation, the Applicant has produced an interim consultation report, called 'Hearing Your Views'. These reports have summarised the feedback received at each stage of consultation and have been published on the project website.</p> <p>Newsletters have advertised these Reports, and provided local communities with a summary overview of the key points.</p> <p>The website has also been regularly updated with information after each stage of consultation and acts as a repository for consultation materials that have been produced over the course of the process.</p> <p>Each interim consultation report and newsletter can be found on the project website, and are included as appendices to the Consultation Report.</p>
83	<p>The consultation report may not be the most appropriate format in which to respond to the points raised by various consultee groups and bodies. Applicants should therefore consider producing a summary note in plain English for the local community setting out headline findings and how they have been addressed, together with a link to the full consultation report for those interested. If helpful, this could be supplemented by events in the local area.</p>	<p>The Applicant has produced a number of accessible documents (for example newsletters and 'Hearing Your Views' reports) setting out the how the proposals have changed as a result of feedback since the close of statutory consultation, and will provide further information on headline issues and how these have been addressed at the point of application submission.</p>
84	<p>A response to points raised by consultees with technical information is likely to need to focus on the specific impacts for which the body has expertise. The applicant should make a judgement as to whether the consultation report</p>	<p>Technical responses have been dealt with in detail in the Environmental Statement (ES), and where appropriate have been cross referenced to the Consultation Report.</p> <p>Technical consultees have been engaged with on a regular basis throughout the process and through the Evidence Plan Process (EPP). Engagement with these bodies will continue through the development of the project as appropriate.</p>

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	<p>provides sufficient detail on the relevant impacts, or whether a targeted response would be more appropriate. Applicants are also likely to have identified a number of key additional bodies for consultation and may need to continue engagement with these bodies on an individual basis.</p>	
93	<p>For the pre-application consultation process, applicants are advised to include sufficient preliminary environmental information to enable consultees to develop an informed view of the project. The information required may be different for different types and sizes of projects. It may also vary depending on the audience of a particular consultation. The preliminary environmental information is not expected to replicate or be a draft of the environmental statement. However, if the applicant considers this to be appropriate (and more cost-effective), it can be presented in this way. The key issue is that the information presented must provide clarity to all consultees. Applicants should be careful not to assume that non-specialist consultees would not be interested in any technical environmental information. It is therefore</p>	<p>The Applicant produced a Preliminary Environmental Information Report (PEIR). This was provided in hard copy at all public event and was available for download from the project website.</p> <p>A Non-Technical Summary (NTS) of the PEIR was also produced and made available at all locations the PEIR was available.</p> <p>The SoCC set out how to access the PEIR, either online, in hard copy, or upon request, and the Applicant undertook the consultation in line with this.</p> <p>The SoCC can be reviewed in Appendix 20.1.</p>

Ref	Requirement	Compliance
	<p>advisable to ensure access to such information is provided during all consultations. The applicant's Statement of Community Consultation must include a statement about how the applicant intends to consult on preliminary environmental information.</p>	
95	<p>When considering whether a project has the potential to significantly affect the integrity of certain European protected wildlife sites, the applicant must provide a report which should include the site(s) that may be affected, together with sufficient information to enable the Secretary of State, as decision maker, to conclude whether an appropriate assessment is required, and, if so, to undertake such an assessment.</p>	<p>The Applicant has undertaken consultation in line with this recommendation and has engaged with a wide range of expert topic groups with statutory and non-statutory consultees through the Evidence Plan Process (EPP). Further information on this point can be found in Chapter 9 of the Consultation Report.</p>
96	<p>It is the applicant's responsibility to consult with the relevant statutory bodies and, if they consider it necessary, with any relevant non-statutory nature conservation bodies, in order to gather evidence for such a report (to support a Habitats Regulations Assessment). This consultation should take place as early as possible in the pre-application process. One way of doing this is for an</p>	<p>As noted above, the Applicant undertook early consultation and developed a comprehensive EPP with relevant bodies. This is set out in Chapter 9 of the Consultation Report.</p>

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	<p>applicant to agree an evidence plan. The Planning Inspectorate can also comment on the applicant's draft report in advance of formal submission of the application if it is provided in good time. Further advice on Habitats Regulations Assessments for major infrastructure projects is available from the Inspectorate's Advice Note 10.</p>	

28. REFERENCES

AECOM. (2012). Kelling to Lowestoft Ness Shoreline Management Plan.
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Royal HaskoningDHV (2016). Norfolk Vanguard Offshore Wind Farm Environmental Impact Assessment Scoping Report