

Norfolk Vanguard Offshore Wind Farm

Appendix 29.2

Consultation Responses

Environmental Statement

Volume 3 – Appendices

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Environmental Impact Assessment Environmental Statement

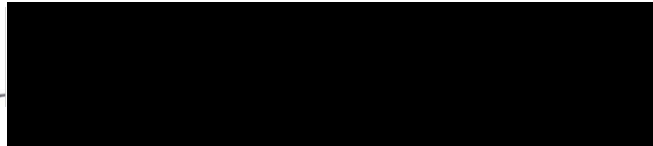
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June 2018

For and on behalf of Norfolk Vanguard Limited

Approved by: Ruari Lean, Rebecca Sherwood

Signed: -



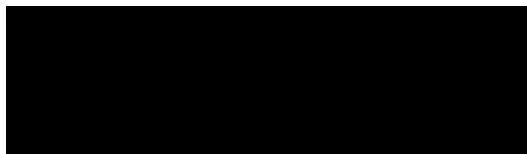
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For and on behalf of Royal HaskoningDHV

Drafted by: OP-EN

Approved by: Jon Allen

Signed:



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Glossary

AONB	Area of Outstanding Natural Beauty
CIA	Cumulative Impact Assessment
CLVIA	Cumulative Landscape and Visual Impact Assessment
DCO	Development Consent order
EIA	Environmental Impact Assessment
GIS	Geographical Information System
GLVIA	Guidelines for the Assessment of Landscape and Visual Impacts
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
LCA	Landscape Character Assessment
LCT	Landscape Character Types
LCU	Landscape Character Units
LI	Landscape Institute
LVIA	Landscape and Visual Impact Assessment
NPS	National Policy Statement
OPEN	Optimised Environments Ltd
SNH	Scottish Natural Heritage
SoS	Secretary of State
WCS	Worst Case Scenario
ZTV	Zone of Theoretical Visibility

Terminology

Indicative mitigation planting	Areas identified for mitigation planting at the onshore project substation and Necton National Grid substation.
Landfall	Where the offshore cables come ashore at Happisburgh South
Mobilisation area	Areas approx. 100 x 100m used as access points to the running track for duct installation. Required to store equipment and provide welfare facilities. Located adjacent to the onshore cable route, accessible from local highways network suitable for the delivery of heavy and oversized materials and equipment.
Mobilisation zone	Area within which the mobilisation area will be located.
National Grid new / replacement overhead line tower	New overhead line towers to be installed at the National Grid substation.
National Grid overhead line modifications	The works to be undertaken to complete the necessary modification to the existing 400kV overhead lines
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
Onshore cable corridor	200m wide onshore corridor within which the onshore cable route would be located as submitted for PEIR.
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 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.
The project	Norfolk Vanguard Offshore Wind Farm, including the onshore and offshore infrastructure.

29 CONSULTATION RESPONSES

29.1 Introduction

1. Consultation is a key driver of the EIA and ES and is an ongoing process throughout the lifecycle of the project, from the initial stages through to consent and post-consent. To date, consultation regarding landscape and visual receptors has been conducted through Expert Topic Group meetings held in January 2017, July 2017 and January 2018 with Norfolk County Council, North Norfolk District Council, Breckland Council, Norfolk Coastal Partnership, Natural England and Historic England. The Scoping Report (Royal HaskoningDHV, 2016) and Preliminary Environmental Information Report (PEIR) (Norfolk Vanguard Limited, 2017) have also been consulted on. Comments submitted by consultees have been taken into consideration within this ES. Full details of the project consultation process are presented within Chapter 7 Technical Consultation.
2. Consultee responses to the Norfolk Vanguard Environmental Impact Assessment (EIA) Scoping Report and the Norfolk Vanguard PEIR are presented in Table. The response column indicates how the comment has been addressed by Norfolk Vanguard Limited, with reference to the relevant section of the EIA.
3. Norfolk Vanguard Limited has reviewed consultation received and, in light of the feedback, has made a number of decisions in relation to the project design. One of those decisions is to deploy High Voltage Direct Current (HVDC) cable technology to the UK's National Grid, and this also removes the need for a Cable Relay Station (CRS) from the project. Consultation comments regarding the CRS are, therefore not referenced in Table 29.1. Assessment of the potential impacts of the CRS presented in the PEIR have been removed from the EIA.

Table 29.1 Consultation Responses

Consultee	Date /Document	Comment	Response / where addressed in the ES
SoS	Scoping Opinion November 2016	The Applicant should use the Zone of Theoretical Visibility (ZTV) to help define the study area and the ES should describe the model used, provide information on the area covered and the timing of any survey work and the methodology used. A clear justification for the definition of each of the study areas should be provided in the ES	ZTVs for the onshore project substation and National Grid substation extension, combined with knowledge of the wider areas have been used to define the study areas. The justification for the study area extents is presented in Chapter 29 Landscape and Visual Impact Assessment section 29.5.1. Information on survey work is presented in section 29.5.2 and on methodology in

Consultee	Date /Document	Comment	Response / where addressed in the ES
			section 29.4.
SoS	Scoping Opinion November 2016	The Secretary of State advises that principal visual receptors are agreed with relevant consultees. The Secretary of State welcomes that viewpoints would be selected in liaison with Norfolk County Council, the Broads Authority and Natural England.	All relevant consultees have been consulted on the selection of viewpoints and visual receptors - comments presented below in this table.
SoS	Scoping Opinion November 2016	The Secretary of State welcomes the consideration of the Norfolk Coast AONB and the Broads NP, even though they are not located within the scoping corridor.	The LVIA considers the potential effects on the Norfolk Coast AONB and Broads NP in Chapter 29 Landscape and Visual Impact Assessment section 29.6.
SoS	Scoping Opinion November 2016	In response to the proposal to scope out the LVIA of offshore components: The Secretary of State agrees a significant effect is unlikely and this can be scoped out of the LVIA but welcomes that the potential temporary impacts from the presence of construction vessels close to the coast will be assessed in respect of onshore receptors.	The assessment of offshore components has been scoped out of this LVIA. Effects of construction vessels on the coastline have been assessed in section 29.7.
SoS	Scoping Opinion November 2016	In response to the proposal to scope out the effects in respect of the landfall and onshore cable route during the operational phase of the project: The Secretary of State agrees that the operational impacts from the landfall and onshore cable route can be scoped out; however, visual impacts that may still occur during the operational phase as a result of the loss of hedgerows and trees required for the cable corridor should be assessed and appropriate mitigation should be identified within the ES.	The assessment of the operational phase of the landfall and onshore cable route has been scoped out of this LVIA as agreed with the SoS in the Scoping Opinion. Effects of vegetation loss associated with the onshore cable route that will carry on into the operational phase have been assessed in Chapter 29 Landscape and Visual Impact Assessment section 29.7.
SoS	Scoping Opinion November 2016	The SoS advises that the ES should make use of photomontages to illustrate the CRS and the onshore project substation. In producing visualisations, including photomontages and wireframes, views should be verified, and visualisations should accord with industry standards.	Norfolk Vanguard Limited has made the decision to deploy HVDC cable technology to the UK's National Grid and this removes the need for a CRS from the project. The LVIA includes photomontages of the onshore project substation from key viewpoints

Consultee	Date /Document	Comment	Response / where addressed in the ES
			produced in compliance with industry standards and verified on site. Visualisations are presented in Figures 29.13-29.24. Appendix 29.1 LVIA Methodology describes the process of verification.
SoS	Scoping Opinion November 2016	In response to the proposal to scope out cumulative effects in respect of the landfall and onshore cable route at all phases of the project: The Secretary of State agrees with this approach for operation and decommissioning; however, as the projects to be considered in the CIA have not yet been determined, the SoS does not agree that construction phase cumulative impacts can be scoped out at this stage.	As requested, the cumulative effects of the landfall and onshore cable route during the construction phase are assessed in Chapter 29 Landscape and Visual Impact Assessment section 29.88 with particular consideration of the Norfolk Boreas project.
SoS	Scoping Opinion November 2016	The assessment should include the consideration of any temporary lighting required for construction, and any permanent lighting for the CRS, substation and access roads.	The LVIA considers the effects of lighting at construction, operation and decommissioning in section 29.7.
SoS	Scoping Opinion November 2016	In respect of mitigation planting, the Applicant should consider whether planting could be implemented at an early stage during construction to give the maximum amount of time for it to mature.	The landscape plans will demonstrate how advanced planting will be implemented at an early phase and will integrate with ecological management plans. See Chapter 29 Landscape and Visual Impact Assessment section 29.7.1 and Outline Landscape and Ecological Mitigation Strategy (OLEMS) for more information.
Natural England	Scoping Opinion November 2016	In respect of the Norfolk Coast AONB: Consideration should be given to the direct and indirect effects upon this designated landscape.	The LVIA considers the potential for significant effects on the Norfolk Coast AONB to arise in Chapter 29 Landscape and Visual Impact Assessment section 29.6.3.
Natural England	Scoping Opinion November 2016	The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape character methodologies.	The relevant Landscape Character Assessments have been used to inform the assessment of effects on landscape character in Chapter 29 Landscape and

Consultee	Date /Document	Comment	Response / where addressed in the ES
			Visual Impact Assessment section 29.7.
Natural England	Scoping Opinion November 2016	Natural England supports the publication GLVIA3.	GLVIA 3 is used as the basis for the methodology applied in the LVIA as summarised in Chapter 29 Landscape and Visual Impact Assessment section 29.4.1 and detailed in Appendix 29.1.
Norfolk County Council	Scoping Opinion November 2016	Breckland District Landscape Character Assessment (LCA) (2007) provides a more appropriate reference than the Norfolk and Suffolk Brecks Landscape Character Assessment (2013).	The LVIA makes reference to the 2007 LCA in Chapter 29 Landscape and Visual Impact Assessment section 29.6.2.
Norfolk County Council	Scoping Opinion November 2016	It is felt that 4D category soft roads should be scoped in in the same capacity as Public Rights of Way for assessment of visual impacts.	4D category roads have been considered as potential receptors in the selection of relevant principal visual receptors.
Norfolk County Council	Scoping Opinion November 2016	...the applicant may wish to consider whether a wider study area is required based on ZTV and ground -truthing of the cable relay...	The ZTV combined with site selection work, have informed the definition of the onshore cable route study area as explained in Chapter 29 Landscape and Visual Impact Assessment section 29.5.1. The CRS no longer forms part of the project.
Norfolk County Council	Scoping Opinion November 2016	The PEIR will need to evaluate the impact of creating new access routes and upgrading existing routes.	The LVIA considers the potential effects of additional and upgraded access tracks in respect of all the onshore infrastructure where relevant in section 29.7.
Norfolk County Council	Scoping Opinion November 2016	The PEIR will need to consider the effects of upgrading any overhead power lines as well as the possibility of putting them underground.	The LVIA considers the potential effects associated with upgrading of overhead power lines in section 29.7.
Broadland District Council	Scoping Opinion November 2016	The cumulative impact with Hornsea 3 wind farm onshore components should be fully assessed.	An assessment of cumulative effects with all other relevant developments is presented in section 29.8.
Broadland District Council	Scoping Opinion November	In respect of extensive areas of historic and landscape designations, there is a 'significant concern' that adverse effects	An assessment of the potential effects of the onshore cable route on designated landscapes is

Consultee	Date /Document	Comment	Response / where addressed in the ES
	2016	on the setting of these areas may arise.	presented in section 29.7. Reference is also made in Chapter 28 Onshore Archaeology and Cultural Heritage.
Natural England	PEIR Review December 2017	Although the cable corridor will seek to avoid areas of woodland and trees, it will be important for the final ES to include information about where there will be a permanent loss of these key landscape features along the onshore cable route and provide details of the steps that have been taken to minimise the loss.	Chapter 22 Onshore Ecology concludes that only one single, isolated, mature tree will be lost during construction. No semi-natural broadleaved woodland will be removed and, under a worst-case scenario, 3.9Ha of plantation woodland will be cleared. Some mature trees in hedgerows would also be lost although precise numbers for this are as yet unknown. Replanting of trees will be secured through measures set out in OLEMS (document reference 8.7). Hedgerows removed along the onshore cable route will be replaced apart from in select locations where technical constraints restrict replanting, such that there will be no overall loss.
Natural England	PEIR Review December 2017	We support advance planting where possible to mitigate for visual impacts followed by post-construction planting.	Mitigation planting shown in Figures 29.9 to 29.12 maximises opportunities to implement advance planting. The OLEMS (document reference 8.7) contains detailed information on mitigation planting.
Natural England	PEIR Review December 2017	Chapter 29 Landscape and Visual Impact Assessment sets out the considerations for assessment however the District Council's adopted Landscape Character Assessment SPD (2013) should be included in the list of documents to have regard to.	Norfolk and Suffolk Brecks Landscape Character Assessment (2013) has been included within the references in section 29.6.3.
Natural England	PEIR Review December 2017	We note that site reconnaissance has shown that the potential impact of the project on the Norfolk Coast AONB would be severely limited by a combination of distance, low landform	Noted.

Consultee	Date /Document	Comment	Response / where addressed in the ES
		and intervening built form and vegetation.	
Natural England	PEIR Review December 2017	We note that site reconnaissance has shown that, despite the proximity of the project to the Broads NP, the extent of mature woodland that separates the two reduces the potential for visibility.	Noted.
Natural England	PEIR Review December 2017	We agree with the conclusions of potentially significant effects that would arise as a result of the project presented in Table 29.25.	Noted (updated reference in Table 29.19 of Chapter 29 Landscape and Visual Impact Assessment).
No 2 Relay Stations (N2RS)	PEIR Review November 2017	We have recorded a number of errors (eg incorrect captioning of photomontages/CGI images and inaccuracies on maps) but there has been significant criticism of the photomontages used to visualise the CRS's and their impact on the landscape. The PEIR admits that such photomontages are not necessarily representative of what the human eye sees. This is borne out by our own experience; they present a 'zoomed out' view compared to that of the naked eye. Current screening is not as substantial as suggested, the structures do not appear to be in scale when compared to local landmarks and new planting appears to suggest a completely unrealistic growth rate in this area.	Figures 29.13 to 29.24 now include 53.5-degree field of view frames for all onshore project substation viewpoint visualisations, to more accurately represent the scale of the proposed development experienced from the viewpoint. 90-degree field of view frames will continue to be included in the ES as these are useful in representing the wider context of the baseline. The accuracy of all visualisations has been subject to verification by OPEN.
Necton Parish Council	PEIR Review December 2017	PEIR chapter 29, section 29.6.4.1, para 173 states that Ivy Todd is a small village. The correct designation is a hamlet with 63 residential properties. Para 174 of the same chapter and section states that Necton is a small town. The correct designation is a village with an area of 15.48 km sq. and a population of just under 2,000 residents. These errors raise a concern about the accuracy of impact evaluation undertaken within this area. We would wish to see this error investigated and evaluations re-assessed.	References to Ivy Todd and Necton have been changed to refer to a hamlet and village respectively.
Necton Parish Council	PEIR Review December 2017	The combined footprint of the two new sites (National Grid and substations) is significantly larger than initially stated by the developer and the real impact is hard to determine through photomontages	Figures 29.13 to 29.24 include a 90-degree frame computer generated model on its own to demonstrate the appearance of the onshore project substation

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		alone, particularly as those published have carried a number of errors and omissions. Vattenfall might want to consider some more simple visual effects, such as a display that demonstrates the actual height/density of the project at both sites. Such a display for public viewing would go some way to understanding the visual impact and would inform a realistic mitigation strategy.	and National Grid substation extension.
Necton Parish Council	PEIR Review December 2017	Necton and the surrounding villages are recognised as a dark sky area, a tourism asset. Yet, the PEIR does not provide clarity as to how our dark skies will be protected. We would like to see a clear strategy on Vattenfall's intentions regarding light pollution at all stages of construction and operation.	Consideration of the effects of lighting during construction and operation are considered in Chapter 29 Landscape and Visual Impact Assessment section 29.7. Chapter 30 Tourism and Recreation addresses the issues relating to dark skies.
Necton Parish Council	PEIR Review December 2017	The Secretary of State has stated the EIA process is iterative, and therefore the proposals may change and evolve. For example, there may be changes to the scheme design in response to consultation. Such changes should be addressed in the ES. However, at the time of the application for a DCO, any proposed scheme parameters should not be so wide ranging as to represent effectively different schemes. It is felt that because Vattenfall is proposing two different schemes i.e. HVDC and HVAC, which will not be decided upon until the project construction begins, they are stretching the envelope too far.	Norfolk Vanguard Limited has reviewed consultation received and, in light of the feedback, has made a number of decisions in relation to the project design. One of those decisions is to deploy HVDC cable technology to the UK's National Grid and this removes the need for a HVAC solution.
Norfolk County Council	PEIR Review December 2017	Necton - The County Council's Landscape Architect has met with the consultant undertaking the LVIA at Necton alongside planning officers from Breckland Council and agreed the viewpoints for the photomontages / visualisations at that location. The majority of the photomontages included in the PEIR (Chapter 29) are considered appropriate.	Noted.
Norfolk County Council	PEIR Review December 2017	The proposed mitigation set out in the PEIR is broadly considered satisfactory. However, the proposed mitigation will need to be more fully addressed in the Outline Landscape Ecological	Detailed information on mitigation planting is included in the OLEMS (document reference 8.7).

Consultee	Date /Document	Comment	Response / where addressed in the ES
		Management Plan (OLEMP), which will be produced alongside the Environmental Statement accompanying the submitted application (under Section 56 of the Plan Act 2008).	
North Norfolk District Council	PEIR Review December 2017	Whilst Vattenfall have committed to seek to mitigate landscape impacts through replacement planting of hedges and trees and planting of new areas of landscaping, for example, around the proposed cable relay station, there are constraints which affect replanting. For example, Vattenfall have indicated in respect of reinstatement that 'Hedgerows would be reinstated in the 54m sections where they would have been removed for open-cut trenching, but hedgetrees and trees would not be permitted to be replanted in these sections or 6-10m either side of the 50m cable easement owing to restrictions of planting over cables'. The Council's Landscape Officer is of the opinion that potentially this will have a significant implication on the residual landscape and visual effects of the onshore cable route. The Landscape Officer is of the opinion that this should be quantified by Vattenfall in order to give a true assessment of how many field trees within hedgerows will be permanently lost and exactly where these will be located. The District Council considers that further work is required by Vattenfall in establishing the likely impact of tree and hedgerow loss and replanting limits within the cable easement corridors (including around the cable relay station) to ensure the effect on landscape character can be properly quantified.	Chapter 22 Onshore Ecology quantifies the loss of hedgerows as follows: The onshore cable route works will result in the temporary loss of approximately 3.3km of hedgerow habitat across 165 hedgerows would occur during the duct installation works. A further temporary loss of approximately 650m of hedgerow habitat across 33 hedgerows would occur during the cable pull works. Mature trees in hedgerows would also be lost although exact numbers for this are as yet unknown. Where possible, hedgerows removed to accommodate the onshore cable route would be replanted across the reduced working width of 20m. The removal of the HVAC solution means that there would be no CRS and therefore no permanent or temporary tree and hedgerow losses previously associated with this part of the project.
North Norfolk District Council	PEIR Review December 2017	The aspirations set out at paragraphs 204 and 205 of the LVIA chapter for the rate of growth of planting is considered to be over-ambitious. The combination of varying ground conditions, exposed sites and prevailing wind will limit this (this position is supported by local knowledge). An estimation of 200mm per annum for core species and 300mm	NNDC's concerns regarding growth rates are specific to the CRS sites in relation to inclement coastal conditions. The original growth rates of 300mm per annum for core species and 400m per annum have been revised to 250 mm and 350mm respectively.

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		per annum for nurse species would be more realistic. Size of stock has not yet been proposed and should include a mixture.	These growth rates have been applied in the visualisations in Figures 29.13 to 29.24 to show the height of mitigation planting after a 20 year period.
North Norfolk District Council	PEIR Review December 2017	Aftercare of planting is a key component of landscape mitigation measures and will be critical to the predicted success of the schemes proposed. This does not appear to have been outlined at this stage but should be fully itemised.	Maintenance of planting is covered in the OLEMS (document reference 8.7) and more detailed guidance will be developed prior to planting implementation.
North Norfolk District Council	PEIR Review December 2017	The District Council recommends that further work needs to be undertaken by Vattenfall to identify those hedgerows / field boundaries that would benefit from trenchless techniques to ensure that these important ecological and landscape features can be retained. This is critical as compensatory planting will not be able to include replacement trees over the buried cable routes.	Through selection of HVDC technology, the width of the onshore cable route has been reduced from 45m to 20m where it crosses hedgerows. The majority of hedgerows removed would be replanted, apart from in select locations where technical constraints restrict replanting. Trees would not be replaced above the cables, nor within a 6m to 10m wayleave either side of the 20m working width. These parameters are assessed in Chapter 29 Landscape and Visual Impact Assessment section 29.7.
North Norfolk District Council	PEIR Review December 2017	In terms of long term and permanent effects on the landscape, there will be a need to provide appropriate landscape mitigation particularly where open cut trenches affect field boundaries and landscape features such as mature trees. Vattenfall has indicated they will seek to do this but this would need to be set out within the mitigation strategy. Where possible, the District Council would expect Horizontal Directional Drilling (HDD) to be used if routes through sensitive woodlands or landscapes cannot be avoided.	The majority of hedgerows removed as part of the onshore cable route construction would be replanted apart from in select locations where technical constraints restrict replanting. No semi-natural broadleaved woodland would be removed and under a worst-case only up to 3.9Ha of plantation woodland would be removed. Additional sites using HDD have been included to ensure all County Wildlife Sites are avoided. Figure 29.9a, 29.10b and 29.11b show mitigation planting for the onshore project substation, National

Consultee	Date /Document	Comment	Response / where addressed in the ES
			Grid substation extension and A47 junction. The OLEMS(document reference 8.7) sets out and secures the proposals for mitigation planting.
North Norfolk District Council	PEIR Review December 2017	In terms of delivering wider public benefits, there may be opportunities for Vattenfall to fund wider landscape mitigation to repair historical damage to field boundaries resulting from modern agricultural practices and to enhance local landscape character. This would also have the added benefit of helping improve biodiversity. Wider landscape enhancement could also improve the quality of walking and cycling opportunities in the countryside and enhance tourism to the benefit of the wider economy.	On-site mitigation measures have been designed to strengthen and extend existing field boundaries and form better connected green corridors. Mitigation planting would lead to a net gain in terms of additional hedgerow and woodland planting. Opportunities for wider landscape enhancements are being considered through ongoing development of design guidance for the area. Figures 29.9a, 29.10b and 29.11b show mitigation planting for the onshore project substation, National Grid substation extension and A47 junction.
Necton Substation Action Group (NSAG)	PEIR Review December 2017	There are no proper accurate and detailed photo montages/ wireframe images to enable a ready visualisation/ appreciation of their visual impact.	All ES figures have been accurately prepared to SNHs guidance standards set out in Visual Representation of Wind Farms Version 2.2 (2017). Figures 29.13 to 29.24 have been updated with 53.5-degree field of view frames to more accurately represent the scale experienced from the viewpoints.
NSAG	PEIR Review December 2017	The local landscape character would be directly affected by the presence of the onshore project substation, with its maximum footprint of 250m x 300m and its maximum height of 25m. This would form a large fenced site containing electrical infrastructure, the most notable component being the HVDC converter halls. <i>Their scale and mass would appear at variance with the scale and character of the rural landscape. Despite the extent of mitigation planting around the onshore project substation, it</i>	The assessment quoted refers to the effects on landscape character. There are no significant effects on the village of Necton as a whole, as visibility of Norfolk Vanguard substation and the National Grid substation extension are limited. There is the potential for residual effects around the eastern settlement edge, but these

Consultee	Date /Document	Comment	Response / where addressed in the ES
		<p><i>would be insufficient in scale to reduce the landscape effect within the operational period.'</i></p> <p>This failure to mitigate the damage to the character of the village or the effect on views shows clearly that this project, especially the HVDC option is too large to fit into an area surrounded by 8 rural communities.</p>	<p>will not redefine the character of the village. Mitigation planting will provide screening along the edges of the National Grid substation extension and onshore project substation which face towards Necton. In Chapter 29 Landscape and Visual Impact Assessment section 29.7, the assessment of Viewpoint 8 and Viewpoint 9 represent the potential effects of the project on residents in Necton.</p>
NSAG	PEIR Review December 2017	<p>PEIR – Chapter 29 - 203</p> <p>The onshore project substation site benefits from some substantial existing hedgerows and woodland blocks within the local area. However, Norfolk Vanguard Limited has committed to additional planting to further screen both the Norfolk Vanguard and Norfolk Boreas onshore project substations. The location of this proposed additional planting is provided in Figure 5.3. Further information on the proposed screening is provided in Chapter 29 Landscape and Visual Impact Assessment.</p> <p>Other parts of the PEIR show that 1km of hedges will be removed, which negates the effects of much of the 'additional' planting, which is in fact not additional as in parts it replaces hedgerows torn up. In addition to this the hedging to be removed is mostly mature of over 20 years standing and should be protected from this development. These plans are in opposition to current government initiatives to protect hedgerows and prevent soil structure damage.</p>	<p>The loss of hedgerow on the substation site would be minimised and, overall, more hedgerow would be gained than lost. Hedgerows would be planted as a double row of whips and with an anticipated growth rate of 350mm per annum on top of a baseline height of 500mm, in 3 to 5 years, the hedge is estimated to grow to a height of 1.5 to 2.2m, sufficient to infill gaps in low to medium hedgerows and 2.2m to 4m in 5 to 10 years, sufficient to infill gaps in high hedgerows. Figure 29.9a, 29.10b and 29.11b show mitigation planting for the substation and National Grid substation extension. The effects of the mitigation planting are addressed in Chapter 29 Landscape and Visual Impact Assessment section 29.7.</p>
NSAG	PEIR Review December 2017	<p>Ivy Todd is a small farming hamlet that will be irrevocably changed by the insertion of an admitted massive industrial project.</p>	<p>While there will be some localised visual effects, the enclosed nature of the surrounding landform and mature tree cover moderates the overall effect on visual amenity. The Norfolk Vanguard onshore project substation is located</p>

Consultee	Date /Document	Comment	Response / where addressed in the ES
			approximately 600m from the village and would be mostly set behind the intervening ridge such that the full extent of the development would not be evident. In Chapter 29 Landscape and Visual Impact Assessment section 29.7, the assessment of Viewpoint 10 represents the potential effects of the project on residents in Ivy Todd.
NSAG	PEIR Review December 2017	PEIR - Chapter 22 – Table 22.2 Breckland Council state: Appropriate landscaping schemes to mitigate against the landscape impact of and complement the design of new development will be required, where appropriate. It has been admitted in the PEIR document (Chapter 29 – Table 29.18) the mitigation against the landscape impact will be unsatisfactory for the operational life of the substation. We object to the proposed siting on these grounds.	Figures 29.13 to 29.24 show the viewpoint visualisations with the revised mitigation planting. The planting will gradually reduce landscape and visual effects on surrounding receptors as it grows. In the localised areas where significant effects would arise, these effects would be mitigated between 5 and 25 years depending on the location of the planting relative to the project.
NSAG	PEIR Review December 2017	PEIR – Table 4.3 Application of Horlock Rules to onshore project substation. The onshore project substation benefits from relatively substantial existing hedgerows and woodland blocks within the local area (e.g. Great Wood and Necton Wood). These would provide a level of mitigation of landscape and visual effects from the outset and can be strengthened with planting proposals during the phases of the proposed project to ensure robust screening. However, this is contradicted by: PEIR – Chapter 29 - Table 29.18 Despite the extent of mitigation planting around the onshore project substation, it would be insufficient in scale to reduce the landscape effect within the operational period. We object to this project being given approval when it is obvious that it cannot be screened sufficiently within its operational lifetime.	In Chapter 29 Landscape and Visual Impact Assessment section 29.7, the assessment considers a great number of different landscape and visual receptors. The existing woodland and hedgerows help mitigate effects from certain directions around Norfolk Vanguard onshore project substation and National Grid substation extension. The extract from Table 29.18 is not a general comment but is part of an assessment made in respect of a particular receptor which has been taken out of context. Improvements to the mitigation planting mean from some representative viewpoints an appropriate relative scale would be

Consultee	Date /Document	Comment	Response / where addressed in the ES
			achieved to mitigate the effects by 10 or 20 operational years of the project.
NSAG	PEIR Review December 2017	<p>PEIR – Chapter 29 - 29.6.4.1 <i>'Necton is a small town located to the south-west of the onshore project substation.'</i></p> <p>This is not correct. Necton is a village not a town and has the character of a village not a town. It has a Parish Council, and not a Town Council. It has the population and housing/business pool of a village, and this cluster of developments would increase its size by almost 50%. Designating Necton as a town rather than a village distorts the matrix evaluation of the effects of the substation on its surroundings. The evaluation should be redone correctly.</p>	References to Ivy Todd and Necton have been changed to refer to a hamlet and village respectively and these changes have been taken into account in the assessment.
NSAG	PEIR Review December 2017	<p>PEIR – Chapter 29 - 29.6.4.1 Ivy Todd is a small village set to the south of the onshore project substation.</p> <p>This is incorrect. Ivy Todd is a tiny hamlet that comes under Necton Parish Council. It will be badly affected by the substations in terms of landscape, character change, noise and light pollution and increased flooding risk. A town has more noise, more buildings, more people, and more roads and would not be as badly affected as Necton will be by a project of this size. This incorrect assessment of Vattenfall's suggests the possibility of the matrix being manipulated to their advantage and should be investigated.</p>	References to Ivy Todd and Necton have been changed to refer to a hamlet and village respectively and these changes have been taken into account in the assessment.
NSAG	PEIR Review December 2017	West End is a hamlet that comes under Bradenham Parish Council, but its extremely close proximity to Ivy Todd, and the dip in the landscape, makes it vulnerable to both views and flooding in addition to the light and noise issues. Its residents have been missed out by Vattenfall and they have not received any information from them.	Specific reference is not made to the hamlet of West End in this chapter as the ZTV shows there would be no visibility of the Norfolk Vanguard substation or the National Grid substation extension from this settlement. It is therefore not relevant to consider it within the LVIA Chapter. West End is considered in Chapter 20 Water Resources and Flood

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			Risk and Chapter 25 Noise and Vibration.
NSAG	PEIR Review December 2017	<p>PEIR – Chapter 29 - 29.6.4.2 The A47 section of relevance to the assessment of the onshore project substation sites lies between Little Fransham in the east and Necton in the west. This section provides access into Necton National Grid substation, although visibility of this large-scale development from the A47 is reduced by the extent of road-side planting. The bare trees filter views in the winter and the leafed trees largely screen views in the summer.</p> <p>This is not correct. The trees planted screen the view when approaching from Swaffham direction of the A47, but when approaching from Dereham direction the entire site is clearly visible as there are no trees blocking the higher ground that the substations stand on – nor could this be able to be mitigated by trees in the foreseeable future as it is too high in the landscape, and as the PEIR has confirmed, satisfactory mitigation is not possible. In the winter, 95% of the site is visible from all directions. The proposed area for the National Grid extensions and the Vattenfall substations is situated between Necton, Ivy Todd-Necton, West End, Holme Hale, Ashill, Little Fransham, Little Dunham and Spicer’s Corner, all of which have sight of, and are affected by the existing infrastructure. It is also visible in all seasons when exiting Swaffham onto the A47. With the new National Grid extensions, almost one third of a mile of NG infrastructure will be clearly seen, running in a continuous line. The two new substations will also be in clear view, as can be seen from the photographic simulations displayed from Spicer’s Corner – another hamlet whose residents have been mistakenly forgotten by Vattenfall.</p>	<p>In respect of views westbound on the A47 from Dereham, the woodland planting on the immediate south-side of the road will screen views of the existing substations within 5 years regardless of the substations being on higher ground. This is because the planting is close to the road and wide enough to form an effective screen. Whilst it is agreed that that the existing substations are visible from more open sections of the A47, clear views are not gained from 95% of this section of road in both directions. Norfolk Vanguard and Norfolk Boreas substations would only be visible from retained openings and will largely be screened by the roadside planting that within 5 years will mature to screen views. Chapter 29 Landscape and Visual Impact Assessment section 29.7 presents the assessment of effects on Viewpoint 5 and Viewpoint 6 which are representative of the views from the A47.</p>
Orsted (Hornsea Project Three)	PEIR Review December 2017	The published timescales for the application for consent for the Hornsea Three and Norfolk Vanguard Offshore Wind Farms are the same – Quarter 2 2018. As a result, it may be difficult for	Chapter 29 Landscape and Visual Impact Assessment section 29.8 updates the cumulative assessment in line with Orsted’s cumulative

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		both projects to include the results of the updated application Environmental Impact Assessments within each other's cumulative assessments. We would therefore request early sight of updated outputs of the Norfolk Vanguard assessments as soon as these are available such that we can conduct as thorough a cumulative assessment as possible at the point of application (where relevant). We are willing to share our updated environmental information at an early stage also.	data on Hornsea Project Three Offshore Wind Farm. The area within which a significant cumulative effect could potentially arise, occurs to the north-east of Reepham, in the localised area where the Hornsea Project Three and the Norfolk Vanguard onshore cable routes cross.
Historic England	PEIR Review December 2017	We note the details 29.2 paragraph 3. As discussed above we are of the view that further visualisations are needed, and that these are specifically produced to illustrate the views to and from designated heritage assets, and other historic environment features. Images are required for both of the Cable Relay Station site options and for the substation, in particular views that provide a representative assessment of St Peter's Church, Ridlington, All Saint's Church, Walcott, and St Mary's Church, and from the monuments to the south east of Necton.	Norfolk Vanguard Limited has reviewed consultation received and in light of the feedback, has made a number of decisions in relation to the project design. One of those decisions is to deploy High Voltage Direct Current (HVDC) cable technology to the UK's National Grid and this removes the need for a Cable Relay Station from the project.
Historic England	PEIR Review December 2017	Historic Environment receptors need to be included in the LVIA maps and the viewpoints that will be used to illustrate key views also recorded. Better integration with chapter 28 is therefore needed.	Chapter 28 Onshore Archaeology and Cultural Heritage presents an assessment of Historic Environment receptors with five representative cultural heritage viewpoints presented in the associated figures.
National Trust	PEIR Review December 2017	The Trust is pleased to see that the proposed route would avoid the Registered Park and Garden (Blickling Hall) and would not impact upon the setting of the listed mansion.	Noted.
Breckland Council	PEIR Review December 2017	Breckland Council influences design through Policy DC16 of the Core Strategy. This requires that development should complement the natural landscape. Given the perceived scale of the development near Necton, achieving an acceptable development of the proposed	Figures 29.9a, 29.10b and 29.11b show the on-site mitigation measures designed to help integrate the project with the local landscape. Figures 29.13 to

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		proportions when it would be sat in the distinct landscape of the District, which is protected by Policy CP11, will be very difficult. The Council also has a duty to maintain the amenities of an area for the benefit of the residents as specified in Policy DC 1.	29.24 show this mitigation planting in respect of the representative viewpoints. The OLEMS (document reference 8.7) contains detailed information on mitigation planting.
Breckland Council	PEIR Review December 2017	The exact extent of the harm is not entirely clear yet and more photomontages and visualisations are required in the forthcoming Outline Landscape Ecological Management Plan which will accompany the application and the Environmental Statement. This should include proposals for an appropriate strategic, substantial and robust landscaping scheme. More detailed comments are set out in the attached "Review of Landscape and Visual Impact Assessment" document.	Figures 29.21 to 29.24 present additional viewpoints and photomontages for the substation and National Grid substation extension. Figures 29.9a, 29.10b and 29.11b show improved mitigation planting proposals. The OLEMS (document reference 8.7) contains detailed information on mitigation planting.
CAPITA on behalf of Breckland Council	PEIR Review December 2017	With respect to landscape sensitivity in para.32, the terms high to low are used but without a further explanation of the criteria applied to each rating.	Appendix 29.1 Methodology explains how the sensitivity rating combines both the value component and susceptibility component, such that the resultant sensitivity rating can represent a range of different criteria which are difficult to capture in single definitions. Reference should be made, instead, to the separate components that combine to determine sensitivity in respect of each receptor.
CAPITA on behalf of Breckland Council	PEIR Review December 2017	I note, however, that the methodology has not provided any definitions of impact significance which I draw attention to in my review of the LVIA. The EIA Methodology in Chapter 6 Table 6.2 suggests that this is the process that is to be followed so the omission of the terms and definitions is queried.	Appendix 29.1 Methodology presents the definition of impact significance in relation to landscape character in section 29.4.2.10 and in relation to views in section 29.5.1.10.
CAPITA on behalf of Breckland Council	PEIR Review December 2017	The establishment of the visual baseline is reasonably described although better cross referencing to section 29.7.2 with respect to the mapping of the Zone of Theoretical Visibility (ZTV) for visualisations and cumulative effects,	Appendix 29.1 Methodology cross references to section 29.7.2 within the description of the visual baseline.

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		would improve the reading of these sections as they are so closely interrelated.	
CAPITA on behalf of Breckland Council	PEIR Review December 2017	It is not clear if all viewpoints have been agreed with the relevant local authorities or if further digital mapping for cumulative effects is to be provided in this document.	Figure 29.7 has been added to show the mapping of cumulative developments. Viewpoint selection has been an ongoing process with comments received through Public Information Days, Environment Topic Group meetings and PEIR consultation. Four additional viewpoints have been included to reflect comments from consultees. All viewpoints are assessed in Chapter 29 Landscape and Visual Impact Assessment, section 29.7.
CAPITA on behalf of Breckland Council	PEIR Review December 2017	With respect to the ZTV it is not clear what mapping data has been used. It is noted on the figures that OS Vector Map District have been used to include woodland features. The process and mapping used, e.g. OS Terrain 5, could be explained, especially if 'visual buffers' such as woods have been taken into account.	Mapping data used is Ordnance Survey Terrain 5. Woodland has been taken into account in the production of the ZTV. Chapter 29 Landscape and Visual Impact Assessment, section 29.7.2 describes the detail of the graphic productions.
CAPITA on behalf of Breckland Council	PEIR Review December 2017	The methodology states that they have not adopted the 53.5-degree frame views but have opted for the 90-degree frames. My understanding is that former are the views that should be held closer than arm's length, arced and viewed with one eye closed, to provide the appropriate viewing context. In para.106 the opposite is stated which should be clarified.	Figures 29.13 to 29.24 now show 53.5-degree field of view frames for each viewpoint to present a more realistic scale of what would be experienced from the viewpoint.
CAPITA on behalf of Breckland Council	PEIR Review December 2017	Reference is made to Visual Nature Studio software in para.104 being used to create computer generated images. It would be helpful if further information could be provided about this software and its appropriateness as, to my knowledge, it is not as regularly used in the UK as say Vectorworks or Rhino.	Visual Nature Studio works with the cylindrically projected photographs that are required as part of SNH's visualisation standards and also works with the earth's curvature. These measures ensure a more accurate representation than could be achieved with other

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			software. Section 29.7.2 of Appendix 29.1 Methodology explains the graphic productions in more detail.
CAPITA on behalf of Breckland Council	PEIR Review December 2017	It is noted that the visualisations prepared should be viewed properly by printing to A1 width, para.99. I do not know if any have been issued at this size or used at consultation events. I would suggest that a viewpoint pack as the SNH guidance advises, could be prepared for a project of this significance, which are suitable for taking to site to compare the view. This should not require wide prints if a narrower angle of view is applied and which would be easier to use in the field.	Visualisations have been printed to correct dimensions for consultation events, PEIR submission and DCO submission. Viewpoint packs can be provided on request.
CAPITA on behalf of Breckland Council	PEIR Review December 2017	In addition, the visualisations do not provide a wire frame only view. As the SNH and LI guidance advise, the accuracy of a photomontage may be illustrated by the means of a wireline image which incorporates sufficient topographic or other features to allow a comparison to be made between the wireline and the photograph.	The visualisations have been prepared using a computer-generated model, not a wireframe. Figures 29.13 to 29.24 include the computer model to allow a comparison to be made with the photograph.
CAPITA on behalf of Breckland Council	PEIR Review December 2017	For some visualisations, I would suggest that better weather conditions could have been sought to improve the clarity of the images.	Figures 29.13 to 29.24 present updated photography taken during better weather conditions. These are winter shots to ensure worst case scenario is represented.
CAPITA on behalf of Breckland Council	PEIR Review December 2017	It is also noted with respect to landscape character, that the LVIA intends to refer to the local level Breckland District Landscape Character Assessment (May 2007) as this provides the basis for determining the effects of development upon landscape character.	Comments from other consultees have queried the use of the 2007 LCA over the 2013 LCA – but earlier comments requested that the 2007 be used as it is considered more appropriate for the purposes of the assessment.
CAPITA on behalf of Breckland Council	PEIR Review December 2017	Definitions to some of the terms used are included, for example in Tables 29.3 and 29.4 with respect to the definition of value and susceptibility levels for landscape and visual receptors which is helpful but, in my view, combining landscape and visual together is not as	Chapter 29 Landscape and Visual Impact Assessment, section 29.4.1 presents separate definitions of value and sensitivity in respect of landscape and visual receptors.

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		clear as defining the terms separately.	
CAPITA on behalf of Breckland Council	PEIR Review December 2017	In my view it would be worth consulting the NCA Profile to ensure that mitigation strategies are consistent with the SEOs, subject to consultation with the relevant statutory bodies.	Chapter 29 Landscape and Visual Impact Assessment, section 29.6.2 includes reference to National Character Area Profiles and Strategic Environmental Objectives. Figure 29.2 includes National Character Areas on landscape character maps.
CAPITA on behalf of Breckland Council	PEIR Review December 2017	Extensive extracts are provided but I consider greater emphasis in some instances could have been given to the landscape strategies and guidelines that are provided in the LCA for the reason given above with respect to the NCA.	Chapter 29 Landscape and Visual Impact Assessment, section 29.6.2 includes reference to the landscape strategies and guidelines provided in the Landscape Character Assessment.
CAPITA on behalf of Breckland Council	PEIR Review December 2017	Landscape designations and registered parks and gardens are suitably referenced and mapped but there would appear to be little cross referencing to Ecological or Historic Landscape Character issues which the section would benefit from as there is a synergy between them, the only brief cross reference is in 29.9 Inter-relationships.	Cross referencing to Ecology and Cultural Heritage Chapters has been included in Chapter 29 Landscape and Visual Impact Assessment, section 29.9, in respect of hedgerow and tree losses and mitigation planting, and the landscape setting of heritage features. OLEMS contains detailed information on mitigation planting.
CAPITA on behalf of Breckland Council	PEIR Review December 2017	Whilst there is much information contained in the summary tables, they are not the easiest to understand. Due to the volume of written text it would be useful to either emphasis the text (e.g. in bold) or re structure it slightly to make it clearer when an assessment is being made, e.g. with respect to sensitivity or value. Alternatively, this could be summarised in the tables in order that the process arrived at in terms of the significance of effects is easier to understand using table headings. For instance, with respect to landscape effects this covers issues of the type and scale of change, its geographical extent, receptor sensitivity and duration and reversibility.	Key findings in Table 29.21 have been highlighted in bold and a fuller explanation of assessments leading to significant effects added. Additional columns to tables have not been added as existing headings correlate with the process undertaken in the methodology, from baseline to sensitivity to magnitude of change to significance of effect and finally duration of effect.

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CAPITA on behalf of Breckland Council	PEIR Review December 2017	The methodology states that in assessing the magnitude of change, size or scale, geographical extent and duration and reversibility are considered separately. In the assessment tables, however, this does not seem to have occurred. The dialogue offered is reasonably comprehensive, but consideration could be given to subdividing the text between scale and geographic extent.	In Tables 29.11 to 29.14 and Tables 29.17 to 29.18, geographical extent is used to refer to the extent of the landscape or visual receptor that would be affected and not the overall geographical extent of the impact as a result of the project. The tables define the size or scale of the effect as the magnitude of change and then that effect is attributed a geographical extent and duration in the end columns. The text between scale and geographic extent is already clearly subdivided.
CAPITA on behalf of Breckland Council	PEIR Review December 2017	What is an omission to me is how the Significance of Effects has been arrived at. The methodology correctly advises that this is arrived at by combining the judgements on sensitivity and magnitude of change using the matrix provided plus professional opinion. No reference in the assessment is made to the combined effects rating and there is no definition of the impact significance terms. For the reasons I have already stated in my comments on the methodology, this appears to be inconsistent with the EIA methodology and I suggest that further justification for this approach is required.	The impact significance for both landscape and visual receptors occurs where the project becomes a defining feature in respect of the character of a defined landscape area, or the visual amenity of the visual receptors. This is set out in Chapter 29 Landscape and Visual Impact Assessment, Table 29.8 and explained in Appendix 29.1 Methodology.
CAPITA on behalf of Breckland Council	PEIR Review December 2017	It also not clear if the effects of lighting have been sufficiently considered at both construction and operational stages. Visualisations may be required at particularly sensitive locations to indicate the potential worse case scenarios during the construction process, particularly where they are of greater duration.	In Chapter 29 Landscape and Visual Impact Assessment, section 29.7.3 and 29.7.4 the potential effects of construction and operational lighting have been included within the assessment where appropriate.
CAPITA on behalf of Breckland Council	PEIR Review December 2017	An overview of mitigation planting is given in para.204 and it is assumed that a greater level of detail will be provided with respect to planting specification, mixes and management in the final submission.	Figures 29.9a, 29.10b and 29.11b show more detail of mitigation planting. OLEMS includes information on planting mixes and management. Detailed planting plans will be prepared prior to construction.

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CAPITA on behalf of Breckland Council	PEIR Review December 2017	I note that significant effects are assessed for localised areas of the different character areas affected and it could be advantageous to indicate graphically their extent for clarity.	In this type of landscape, the thresholds between significant and not significant cannot be defined by a hard line as, in most cases, there is a gradual transition from one to the other. The narrative defines these areas sufficiently for the purposes of the assessment.
CAPITA on behalf of Breckland Council	PEIR Review December 2017	It is noted that some viewpoints are from remnant public rights of way and it's understood a strategy is in preparation to consider re-establishing routes so that they link up. It would be helpful if this could be taken into consideration in the mitigation proposals.	Mitigation measures are contained within the onshore project substation, National Grid substation extension and A47 slip road sites as shown on Figures 29.9a, 29.10b and 29.11b. Chapter 30 Tourism and Recreation addresses impacts on PROWs.
CAPITA on behalf of Breckland Council	PEIR Review December 2017	With regard to sensitivity, walkers are recorded as medium sensitivity. I would not agree with this rating and would consider them of high sensitivity as they are likely focused on the countryside around them. For Viewpoint 3 (Figure 29.24) for example, using purely a matrix approach this could arrive at the effect being significant which, with regard to the HVDC option is, in my view arguably the case. In my opinion this is an example of where the use of impact terms with definitions would have aided the assessment process.	Following GLVIA2, this might have been the case. With GLVIA3, susceptibility is combined with value in the overall assessment of sensitivity, and in the example of Viewpoint 3, susceptibility is moderated by the existing presence of energy infrastructure visible from Lodge Lane. Furthermore, the denuded appearance of this landscape reduces the value and the overall sensitivity of the views walkers experience. The assessment of Viewpoints 2 and 3 are presented in section 29.7.
Broadland District Council	PEIR Review December 2017	Chapter 29 Landscape and Visual Impact Assessment sets out the relevant considerations for assessment, however the District Council's adopted Landscape Character Assessment SPD (2013) should be included in the list of documents to have regard to.	In Chapter 29 Landscape and Visual Impact Assessment, section 29.6.3 the 2013 LCA has been added to the list of references.
Broadland District Council	PEIR Review December 2017	The proposed construction of the cable route of the Norfolk Vanguard Offshore Wind Farm together with the cumulative	Chapter 29 Landscape and Visual Impact Assessment, section 29.8 includes more

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		<p>construction of the Norfolk Boreas Wind Farm and the anticipated construction of the cable route of the Hornsea Project Three Wind Farm will all take place in the relative proximity of one another in and around Salle Park and Reepham and the assessment methodology should identify how the visual and constructional impacts will be minimised and a build programme managed to ensure that these impacts will be reduced through a co-ordinated approach.</p>	<p>detailed information and assessment in respect of the potential cumulative effects adjacent to Salle Park.</p>
<p>East Rushton Parish Council and Residents</p>	<p>PEIR Review December 2017</p>	<p>The largely desk-based research, which defines it (the local landscape) as of only 'moderate' importance, completely fails to recognise its value.</p>	<p>This landscape is not covered by any national, district or local level designations which would otherwise denote a special importance or value. Whilst it is of local value, compared to other landscapes, such as AONB's, this value is moderate rather than high. Appendix 29.1 Methodology explains the relative value attributed to landscape character.</p>
<p>Norfolk Coast Partnership</p>	<p>PEIR Review December 2017</p>	<p>The current 2014-19 Norfolk Coast AONB Management Plan has a Policy (PC5) to 'Support the development of renewable energy in the area in ways and locations that contribute to the area's local economy and jobs and maintain its natural beauty.' However, the National Planning Policy Framework emphasises that the impact of a proposed development is an important consideration, including the cumulative landscape and visual impacts. It states that 'Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty'.</p>	<p>The potential effect of the proposed development on landscape designations such as AONBs and NPs has been scoped out of the assessment owing to the absence of any material visibility from these areas. This position was presented in PEIR and did not give rise to any comments or objections from consultees other than the comment to the left made by Norfolk Coast Partnership.</p>

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