

**Norfolk Vanguard Offshore Wind Farm**

# **Applicant Response to North Norfolk District Council Local Impact Report**



Applicant: Norfolk Vanguard Limited  
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*Photo: Kentish Flats Offshore Wind Farm*

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## Glossary

AONB	Area of Outstanding Natural Beauty
CoCP	Code of Construction Practice
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EMP	Ecological Management Plan
ES	Environmental Statement
HDD	Horizontal Directional Drill
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
LIR	Local Impact Report
NSIP	Nationally Significant Infrastructure Project
OCoCP	Outline Code of Construction Practice
OLEMS	Outline Landscape and Ecological Management Strategy
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground

## 1 INTRODUCTION

1. In accordance with the Rule 8 letter of 19 December 2018, North Norfolk District Council has submitted a Local Impact Report (LIR) at Deadline 1 in relation to the application for a Development Consent Order (DCO) for Norfolk Vanguard Offshore Wind Farm (the Project) as submitted by Norfolk Vanguard Limited (the Applicant). This provides a summary of North Norfolk District Council’s position on various matters including:

- Marine Processes
- Ground Conditions and Contamination
- Water Resources and Flood Risk
- Land Use and Agriculture
- Onshore Ecology and Onshore Ornithology
- Traffic and Transport
- Noise, Vibration and Air Quality
- Onshore Archaeology and Cultural Heritage
- Landscape and Visual Impact Assessment
- Tourism, Recreation and Socio-Economics
- Statement of Common Ground (SoCG)

### 1.1 North Norfolk District Council Local Impact Report

#### 1.1.1 Summary Response

2. The Applicant has responded below to matters raised by North Norfolk District Council. A SoCG (Rep1-SOCG-17.1) has been produced between North Norfolk District Council and Norfolk Vanguard Limited, which provides a summary of matters agreed and those under further discussion. The Applicant will continue to engage with North Norfolk District Council to points still under discussion in order to reach agreement in due course. Where further progress is made between the Applicant and North Norfolk District Council, an updated version of the SoCG will be submitted at an appropriate deadline. The final position of the SoCG will be submitted on or before Deadline 8 on the 30 May 2019.

#### 1.1.2 Full Response

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<p><b>1. Introduction</b></p> <p>1.1. This report sets out North Norfolk District Council’s (NNDC) position in relation to the Development Consent Order (DCO) application for Norfolk Vanguard offshore wind farm made under Section 56 of the Planning Act (2008).</p>	<p>Noted. The Applicant has responded below to each of the specific points identified by North Norfolk District Council.</p>

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<p>1.2. North Norfolk District Council is an Interested Party to this Nationally Significant Infrastructure Project (NSIP) with offshore cables reaching landfall south of Happisburgh and the onshore cable corridor passing through the District.</p> <p>1.3. In responding to this NSIP application, the District Council has drawn from, amongst other things, internal expertise in relation to:</p> <ul style="list-style-type: none"> <li>• Coastal Processes</li> <li>• Landscape and Visual Impacts</li> <li>• Ecology</li> <li>• Environmental Protection</li> <li>• Economic Development</li> </ul> <p>1.4. In assessing development proposals under exercise of its functions as a Local Planning Authority, North Norfolk District Council would normally seek advice from external partners including Norfolk County Council who undertake a number of functions including as Highway Authority, Public Rights of Way and Lead Local Flood Authority. Where stated within this report, the District Council will defer matters for consideration/comment of the County Council given their statutory roles and considered knowledge/expertise.</p>	
<p><b>2. Description of North Norfolk</b></p> <p>2.1. North Norfolk District Council's jurisdiction extends inland from the Mean Low- Water mark along the coastline. The proposal would affect land within NNDC stretching from the intertidal area at Happisburgh and inland along the proposed cable route and 40m wide working corridor until it passes out of the district into Broadland District Council near to Aylsham.</p> <p>2.2. North Norfolk District covers an area of 87,040 hectares (340 square miles) (excluding the Broads Authority Executive Area), with a 73km (45 mile) North Sea coastline. A significant proportion of the District is included within the nationally designated Norfolk Coast Area of Outstanding Natural Beauty (AONB) and the North Norfolk Heritage Coast. The eastern end of the District also adjoins The Broads, which has the status of a National Park.</p> <p>2.3. The main settlements in the District comprise seven towns (Cromer, Fakenham, Holt, North Walsham, Sheringham, Stalham and Wells-next-the-Sea) and three large villages (Briston / Melton Constable, Hoveton &amp; Mundesley), which accommodate approximately half of the District's population (101,149 at the 2011 Census).</p> <p>2.4. The District's main road network comprises the A140 (Cromer to Norwich), the A148 (Cromer to King's Lynn - via Holt and Fakenham) and the A1065 (Fakenham to Mildenhall), as well as the more minor A1067, A149 and A1151. There is only one public rail service in the District, comprising the 'Bittern Line' linking Sheringham with Norwich (with stops between including the settlements of Cromer and North Walsham).</p>	Noted.

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<p>2.5. The District has a strongly rural character with agriculture, in particular arable farmland, comprising by far the largest component of land use.</p> <p>2.6. A network of Rights of Way crosses open fields, heathlands and woodlands. Many of the large areas of coastline, heathland and woodland have open access. The Norfolk Coast Path National Trail follows the entirety of the District's coastline, linking with the Peddars Way in the west and the Paston Way in the east.</p> <p>2.7. There are many aspects of the North Norfolk environment to be positive about, such as:</p> <ul style="list-style-type: none"> <li>• The stunning landscape of the North Norfolk Coast AONB, carefully managed by the Norfolk Coast Partnership to ensure it can be enjoyed by generations to come.</li> <li>• The large number of internationally and nationally designated sites and nature reserves, home to many rare and protected species and landscapes.</li> <li>• The wealth of archaeological and historic environment sites throughout the district, from the prehistoric to the Cold War.</li> <li>• The rare arable plants thriving in pockets of North Norfolk farmland.</li> <li>• The conservation groups, organisations and individuals working hard to record, protect and enhance the natural environment of North Norfolk.</li> </ul> <p>2.8. The District contains a large number of agricultural holdings which are predominantly arable in nature and which include areas containing some of the best and most versatile agricultural land.</p> <p>2.9. The District also has a significant tourism economy supporting 11,352 jobs (28% of total employment in North Norfolk) in 2017 with a total tourism value of £505m. The North Norfolk Core Strategy recognises the importance of tourism to the district. The strategic vision for North Norfolk in section 2 of the Core Strategy includes at paragraph 2.1.4:</p> <p>"Sustainable tourism, building on the unique natural assets of the countryside and coast, will be a major source of local income and employment and will be supported by an enhanced network of long-distance paths and cycle routes such as the North Norfolk Coastal Path and Weavers Way."</p>	
<p><b>3. Principle of Renewable Energy</b></p> <p>3.1. North Norfolk District Council is fully supportive of the principle of renewable energy development in helping to tackle the challenges faced by climate change. The District Council recognises the national importance of having a balanced supply of electrical generation including increasing renewable energy supplies from offshore turbines in helping decarbonise the UK's energy sector. Accordingly, the project's contribution to renewable energy is a significant positive impact.</p> <p>3.2. At a local level, the District Council has made a significant contribution of its own through, amongst other</p>	<p>The Applicant notes North Norfolk District Council's support of the principles of renewable energy. Responses to North Norfolk District Council's comments in relation to landscaping and design considerations are provided below.</p>



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<p>things, the grant of planning permission for in excess of 150MW capacity of solar farms, with electrical output capable of powering over 40,000 homes, in North Norfolk. This has been delivered without significant adverse impacts on the wider landscape (including development within and/or adjacent to the Norfolk Coast Area of Outstanding Natural Beauty) through, amongst other things, careful siting and design.</p> <p>3.3. The onshore element of Norfolk Vanguard passes through some sensitive and valued landscapes and this emphasises the importance of key design considerations which will help to reduce overall impacts, both short, medium and long-term.</p>	
<p><b>4. Choice of Transmission System</b></p> <p>4.1. North Norfolk District Council welcomes the decision of Vattenfall to commit to the use of high voltage direct current (HVDC) transmission for both the Norfolk Vanguard and Norfolk Boreas projects. This decision was made following the Preliminary Environmental Information Report (PEIR) stage at which the District Council and many local residents/business and other consultees raised concerns about the potential adverse impacts from the onshore cable relay stations needed for the high voltage alternating current (HVAC) transmission system in the East Ruston / Ridlington area of North Norfolk.</p> <p>4.2. In the opinion of North Norfolk District Council, the decision by Vattenfall to adopt the HVDC transmission system meaning that cable relay stations are no longer required and allowing the working corridor of the project to be reduced to 45m, is a hugely positive step in terms of minimising project impacts within the North Norfolk area.</p> <p>4.3. However, whilst Vattenfall have committed to using HVDC which is welcome by most parties along the route, it will nonetheless be important in order to minimise any negative impacts of the project within North Norfolk to ensure that alternative and more harmful transmission choices such as High Voltage Alternating Current (HVAC) and the inclusion of HVAC 'booster stations' are not subsequently permitted under 'non-material amendment' legislation, post consent. The District Council consider that such a change could not be considered to be 'non-material' and would politely ask the Examining Authority (ExA) for reassurances on this point.</p>	<p>Noted.</p> <p>The question has been raised whether a change from an HVDC to HVAC export system would require a non-material or material amendment to the DCO.</p> <p>The Planning Act 2008 (the 2008 Act) and the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011 (the 2011 Regulations) provide separate procedures for handling applications for non-material and material changes to Development Consent Orders. The simpler process for handling non-material changes reflects the fact that such changes do not raise issues requiring the same level of scrutiny as changes that are material. However neither the 2008 Act nor the 2011 Regulations provide a definition of a material or non-material change.</p> <p>The DCLG Guidance on changes to Development Consent Orders (December 2015) does provide examples of certain characteristics that indicate that a change to a consent is more likely to be treated as a material change, including</p> <ul style="list-style-type: none"> <li>(i) if it would require an updated Environmental Statement to take account of new, or materially different, effects on the environment (12);</li> <li>(ii) if it would authorise the compulsory acquisition of any land, or an interest in or rights over land that was not authorised through the existing Development Consent Order (15);</li> <li>(iii) where the change would have an impact on local people and</li> </ul>



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	<p>businesses and impacts such as visual amenity, impacts on the natural or historic environment and impacts arising from additional traffic.</p> <p>It would not be physically possible to construct an HVAC export system within the Order Limits, as defined by the work plans and land plans. An HVAC transmission system would require a much wider cable corridor for the additional cables required and would entail the compulsory acquisition of additional land or additional rights over land. The description of the authorised development contained in Part 1 Schedule 1 of the draft DCO does not refer to, or consent the construction of the additional infrastructure which would be required for an HVAC export system such as a cable relay station and the additional number of cables which would be required. Only the HVDC export infrastructure was assessed under the Environmental Statement and an updated Environmental Statement would be required. The additional HVAC infrastructure would also potentially affect local people and businesses and would potentially involve impacts such as visual amenity, impacts on the natural or historic environment and impacts arising from additional traffic.</p> <p>For all the above reasons there can be little doubt that any change to an HVAC export system would require a material amendment to the DCO.</p>
<p><b>5. Marine Processes</b></p> <p>5.1. North Norfolk District Council's jurisdiction extends inland from the Mean Low- Water mark. This means that an element of the marine processes falls within the consideration of the District Council at the point where offshore cables come onshore.</p> <p>5.2. The main area of interest for the District Council is in relation to the method of bringing offshore cables onshore in the Happisburgh area including the potential impact of works on nearshore coastal processes. NNDC welcome the position set out by Vattenfall at paragraph 384 of Chapter 8 of the Environmental Statement which states:</p> <p>'The HDD will be secured beneath the surface of the shore platform and the base of 384.the cliff, drilled from a location greater than 150m landward of the cliff edge. The material through which the HDD will pass, and through which the cables</p>	<p>The Applicant notes the comments from North Norfolk District Council in paragraphs 5.1 and 5.2. and refers to the SoCG between North Norfolk District council and Norfolk Vanguard Limited (Rep1-SOCG-17.1) which includes agreement on the existing environment and assessments.</p> <p>In relation to paragraph 5.3, the Applicant refers to the SoCG between North Norfolk District council and Norfolk Vanguard Limited (Rep1-SOCG-17.1), where matters related to the sea wall at Cart Gap are subject to further ongoing discussions.</p>

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<p>will ultimately be located, is consolidated and will have sufficient strength to maintain its integrity during the construction process and during operation. Also, the cable will be located at sufficient depth to account for shore platform steepening (downcutting) as cliff erosion progresses, and so will not become exposed during the design life of the project (approximately 30 years). Hence, the continued integrity of the geological materials and the continued depth of burial of the cables mean that they will have no impact on coastal erosion during both construction and operation'.</p> <p>This represents the best option for NNDC.</p> <p>5.3. However, NNDC will continue to work with the applicant to understand the potential options for Cart Gap sea wall. This end section of seawall has suffered from cliff scour and a significant void between the cliff and defence is now present. Should appropriate locally generated clean spoil requiring disposal be generated during construction, it could be considered beneficial to reuse these materials to infill behind this sea wall. This would be subject to necessary licences but could prevent otherwise locally useful materials being transported longer distances for disposal and provide additional erosion protection in this location. This could be secured within the final DCO either as part of the CoCP or other relevant documents to be determined between the parties.</p> <p>5.4. NNDC agree the proposal is unlikely to be adversely affected by the Bacton sand engine coastal protection scheme north of the site at Bacton Gas Terminal and along the coast towards Bacton and Walcott.</p> <p>5.5. The mitigation measures set out at Table 8.45 with Environmental Statement Chapter 8 [APP-332] do not appear to cover the 'long' HDD works. NNDC would expect that appropriate mitigation will be set out within the CoCP and other relevant documents to be agreed as part of the DCO.</p> <p>5.6. In the likely event of the DCO being granted, NNDC would not expect that any subsequent changes from the 'long' HDD option to bring cables onshore to the use of open cut trenching could be permitted within the scope of a 'non-material' amendment as this would take the proposal outside the scope of the Environmental Statement. 'Open cut trenching' would represent the very worst option for NNDC, hence why there is strong support for 'long' HDD.</p>	<p>In relation to paragraph 5.5, embedded mitigation is identified in ES Chapter 8, section 8.7.4.1 and includes long HDD as required under DCO Schedule 1 Part 3 Requirement 17(2)).</p>
<p><b>6. Ground Conditions and Contamination</b></p> <p>6.1. Environmental Statement Chapter 19.5.3 [APP-343] sets out the assumptions and limitations associated with the data sources used to inform the report. NNDC cannot reasonably consider at this stage that sufficient survey data has been collected to undertake the assessment. Whilst proposed construction activities are predominantly taking place in agricultural fields where the risk of contamination is likely to be low, contaminated land could be discovered at any point along the proposed works, especially where human activity has occurred. The assessment cannot therefore rule out the potential for unknown contamination to be identified during the</p>	<p>Noted. The Applicant refers to the Outline Code of Construction Practice (OCoCP) (document reference 8.1) which contains proposed control measures related to ground conditions and contamination. Environmental Statement (ES) Chapter 19 (document reference 6.1.19) outlines the need to produce a written scheme for the management of contamination of any land and groundwater, which will be submitted to the local authority for</p>

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<p>construction phase. The key factor is to ensure there is an appropriate strategy in place to deal with contamination should it arise and NNDC will work with the applicant to help deliver an acceptable strategy.</p> <p>6.2. Subject to agreement of final wording for Requirement 20 within the draft DCO to ensure it can deliver what is expected, NNDC consider that the mitigation of impacts associated with ground conditions and contamination are appropriate and adequate.</p>	<p>approval. The document will provide procedures to follow in the event of encountering unexpected contamination during construction. The SoCG between Norfolk Vanguard Limited and Environment Agency (Rep1-SOCG-6.1) details these matters in relation to ground conditions and contamination as agreed.</p>
<p><b>7. Water Resources and Flood Risk</b></p> <p>7.1. In respect of the impact of the project on water resources and flood risk within North Norfolk District Council jurisdiction, NNDC would defer to the expert advice of the Environment Agency in respect of the strategic overview of the management of all sources of flooding and coastal erosion, to the advice of Norfolk County Council Lead Local Flood Authority in respect of developing, maintaining and applying a strategy for local flood risk management in this area and for maintaining a register of flood risk assets. NNDC would also defer to the advice of Norfolk Rivers Internal Drainage Board who manage assets within/along/near the route of the proposed onshore cable corridor.</p>	<p>Noted. The Applicant is engaging with Norfolk County Council and the Environment Agency in relation to potential impacts on water resources and flood risk. The SoCG between Norfolk Vanguard Limited and Environment Agency (Rep1-SOCG-6.1) and between Norfolk Vanguard Limited and Norfolk county Council (Rep1-SOCG-15.1) details these matters in relation to water resources and flood as agreed, or subject to further discussion as appropriate.</p>
<p><b>8. Land Use and Agriculture</b></p> <p>8.1. NNDC consider that the primary consideration for land use and agriculture relates to the timing of works (such as avoiding taking agricultural land out of production for long periods of time) how works are undertaken (to be agreed within the CoCP) including the method for handling/storing soils. The commitments made by Vattenfall through use of HVDC with a smaller working corridor, the commitment to ducting both Vanguard and Boreas at the same time all contribute to reducing the Rochdale envelope of the project. As such the significance of any impacts are dependent on the requirements to be agreed within the DCO.</p> <p>8.2. NNDC welcome the suggested embedded mitigation and additional mitigation committed to within the CoCP and secured through Requirement 20.</p>	<p>Noted.</p>
<p><b>9. Onshore Ecology and Onshore Ornithology</b></p> <p>9.1. NNDC recognises that Vattenfall have undertaken desktop studies and Extended Phase 1 Habitat Surveys together with site specific surveys in accordance with best practice recommendations in order to inform the baseline data which underpin Environmental Statement Volume 1 Chapter 22 – Onshore Ecology [APP-346] and Volume 1 Chapter 23 Onshore Ornithology [APP-347]. Statutory and Non-Statutory designated sites are recognised within Figures 22.02 and 22.03. However, the ES recognises that not all areas have been surveyed in setting out potential impacts and cumulative impacts and therefore Vattenfall need to recognise this in making any assumptions about the proposal. Post- consent surveying needs to be secured within the DCO. NNDC will work with Vattenfall to ensure key ecological objectives are met.</p>	<p>The Outline Landscape and Ecological Management Strategy (OLEMS) (document reference 8.7) contains a commitment to pre-construction surveys in areas where surveys were not possible during the 2017 ecological surveys, the findings of which will inform the final Ecological Management Plan (EMP). The OLEMS and EMP are secured through DCO Requirement 24.</p>

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<p>9.2. Whilst DCO requirement 24 is acknowledged and supported, given the absence of full surveying, post-consent surveying needs to be clearly secured and which will be critical in underpinning the ecological management plan. DCO Requirement 24(1) is not considered adequate or clear in respect of the need for further pre-commencement surveying. This means the requirement for pre- construction surveying falls to DCO Requirement 28 which relates to European Protected Species and final pre-construction survey work. Surely the findings of these surveys need to link back to informing Requirement 24 otherwise requirements 24 and 28 may work against each other. NNDC will work with Vattenfall to ensure key ecological objectives are met.</p>	
<p><b>10. Traffic and Transport</b></p> <p>10.1. North Norfolk District Council do not wish to comment on traffic and transport matters and would defer such matters of consideration to Norfolk County Council, who are the Highway Authority covering North Norfolk and who are the technical experts who would normally give highway advice to the District Council.</p>	Noted.
<p><b>11. Noise, Vibration and Air Quality</b></p> <p>11.1. NNDC consider that the measures set out in the draft DCO (Requirement 20 - Code of Construction Practice and Requirement 26 – Construction Hours) provides an effective way to help minimise any adverse impacts during the construction phase and will work with the applicant to ensure the DCO requirement drafting delivers its intended purpose.</p>	Noted.
<p><b>12. Onshore Archaeology and Cultural Heritage</b></p> <p>12.1. NNDC consider that the commitment by Vattenfall to use HVDC transmission has, amongst other things, negated the need for onshore cable relay stations and has narrowed with width of the cable corridor. This means that, whilst there will be some impacts to heritage assets and their settings, this impact will occur primarily at construction stage and are therefore of a temporary nature.</p> <p>12.2. NNDC consider that these impacts are all on the 'less than substantial' scale and the operational phase of the windfarm is considered unlikely to result in unacceptable impacts. On this basis, the considerable public benefits associated with the windfarm would more than outweigh the 'less than substantial' harm to heritage assets within North Norfolk.</p> <p>12.3. In respect of archaeology, NNDC would defer to the advice of Norfolk County Council Historic Environment Service who provide advice to North Norfolk District Council in relation to all matters of archaeological heritage.</p>	Noted.
<p><b>13. Landscape and Visual Impact Assessment</b></p> <p>13.1. North Norfolk District Council consider that Vattenfall have given appropriate regard to relevant national policy</p>	The Applicant refers to the SoCG between North Norfolk District Council and Norfolk Vanguard Limited (Rep1-SOCG-17.1), where matters related to new studies are subject to further

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<p>13.2. However, in respect of relevant Local Policy and material planning considerations, in 2018 North Norfolk District Council commissioned two new studies:</p> <ul style="list-style-type: none"> <li>i) revised Landscape Character Assessment; and</li> <li>ii) a new Landscape Sensitivity Assessment (with particularly reference to renewable energy and low carbon development).</li> </ul> <p>13.3. Both of these documents have been published in final form and represent the most up to date and accurate assessment, based on current best practice. Public consultation on these documents is expected to take place in Feb/Mar 2019 with adoption as Supplementary Planning Documents in Spring/Summer 2019.</p> <p>13.4. NNDC consider that the baseline environment needs to take account of these new resources.</p> <p>13.5. NNDC consider that there will be some residual landscape and visual effects after the construction phase associated with tree and hedgerow removal until such time as mitigation planting is achieving its intended purpose.</p> <p>13.6. In respect of Chapter 29 of the ES [APP- 353], NNDC agree that the worst-case scenario presented in the assessment is appropriate subject to the scheme not subsequently being amended to HVAC (with associated onshore cable relay station).</p> <p>13.7. In respect of mitigation, notwithstanding the details set out in the OLEMS [APP- 031], NNDC would wish to influence the species choice with regard to landscape mitigation planting and therefore welcomes proposed DCO Requirement 18.</p> <p>13.8. Whilst NNDC generally welcome the contents of DCO requirements 18 and 19, it is requested that the five-year time frame for replacement of failed planting should be extended to 10 years, particularly given the slower growth rates typically experienced in North Norfolk.</p> <p>13.9. NNDC would also welcome further clarification as to who will manage and maintain landscape mitigation planting.</p>	<p>ongoing discussions. It is agreed with North Norfolk District Council that based on the information available at the time the application was submitted (June 2018) sufficient survey data (extent/duration) was collected to inform the assessment.</p> <p>In relation to paragraph 13.5, visual impacts associated with the landfall and cable installation are limited to the construction phase and an assessment of operational impacts was not required.</p> <p>Landscape and visual impacts that occur during construction, such as the recovery of hedgerows and trees following removal, are therefore assessed in full for the construction phase rather than operation.</p> <p>In relation to paragraph 13.7, Requirement 18 states that for each stage of the works a written landscape management scheme must be submitted to and approved by the relevant planning authority in consultation with Natural England. With regards to works in North Norfolk District the relevant planning authority would be North Norfolk District Council.</p> <p>In relation to paragraph 13.8, a five-year replacement / maintenance period has been proposed as this is a standard timeframe for the type of planting proposed. The majority of defects will occur in the first five years and plants that survive the first five years are by that stage robust and well established. Time beyond five years is related to the maturation of established specimens and ongoing maintenance beyond five years has not been identified as necessary</p> <p>The Applicant refers to the SoCG between North Norfolk District Council and Norfolk Vanguard Limited (Rep1-SOCG-17.1), where matters related to DCO Requirement wording is subject to further ongoing discussions.</p> <p>In relation to paragraph 13.9, DCO Requirement 18 and 19 (Landscaping</p>



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	<p>Management Scheme) detail the provision, implementation and maintenance of landscaping. The Landscape Management Strategy will include details of who will undertake the management and maintenance of landscaping, which will be the ultimate responsibility of the Applicant.</p>
<p><b>14. Tourism, Recreation and Socio-Economics</b></p> <p>14.1. In respect of data sources set out at Table 30.11, whilst the ES has taken account of the NNDC commissioned annual study of the Economic Impact of Tourism for 2016, an updated version is available to view on the Council's website for the year 2017 and which is attached to this document at Appendix A. This should be used to inform the baseline environment. Because of the high level of dependence of the North Norfolk economy on tourism (£505m total tourism value, 11,352 jobs (28% of total employment) in 2017) any impact upon that sector will have a disproportionately high impact upon the overall economy of the District. (Source: Economic Impact of Tourism – North Norfolk 2017 produced by Destination Research/Sergi Jarques).</p> <p>14.2. In respect of the baseline environment set out in ES Chapter 30 [APP-354] NNDC would challenge the assumption set out at paragraph 214 that 'Outside of The Norfolk Coast AONB, the countryside of North Norfolk and Breckland is not regarded as a direct draw for tourism although it is well regarded by local recreational users and an intrinsic aspect of the visitor's experience'.</p> <p>14.3. Due to high quality landscapes and the existence of many important heritage assets, tourism benefits are not just limited to areas within the Norfolk Coast AONB or coastal resorts. Many popular cycle and walking routes are located outside of the AONB.</p> <p>14.4. In respect of the ES assessment findings, NNDC consider that the onshore cable route goes through some attractive and sensitive parts of North Norfolk District, especially between Happisburgh and North Walsham and this area is attractive to tourists throughout the year and host to visitor accommodation, facilities and some attractions including walking and cycling.</p> <p>14.5. In this regard, whilst North Norfolk District Council believes the long-term impacts of the cable route on the tourism economy will be benign, the Council has very significant concerns that during the cable corridor construction phase there will be significant impacts on local tourism businesses such that the construction works will have a significant impact on the income of tourism businesses in the Happisburgh to North Walsham area, which needs greater recognition by Vattenfall.</p> <p>14.6. In respect of the approach to mitigation, whilst further detail has been provided in relation to the establishment of a Community Liaison Committee and the appointment of a Community Liaison Officer, it still remains unclear exactly what mitigation is to be proposed off the back of these initiatives to</p>	<p>The Applicant refers to the SoCG between North Norfolk District council and Norfolk Vanguard Limited (Rep1-SOCG-17.1), where matters related to data informing the baseline environment is subject to further ongoing discussions.</p> <p>In relation to paragraph 14.3, ES Chapter 30 Tourism and Recreation (document reference 6.1.30) identifies the Norfolk Coast Area of Outstanding Natural Beauty (AONB) as a tourism feature of national importance, and footpaths, cycles routes and coastal resorts are identified as tourism features of regional importance.</p> <p>In relation to paragraphs 14.4 and 14.5, the impacts on tourism, recreation and socio-economics are likely to be non-significant in EIA terms. In order to minimise impacts and disruption, the onshore duct installation process will be undertaken in a sectionalised approach. Workfronts will operate from mobilisation areas distributed along the cable route. Each workfront will work on a short length (approximately 150m per week). This minimises amount of time spent in any one area during construction.</p> <p>In relation to paragraphs 14.6, the provision of community liaison responsibilities is secured through DCO Requirement 20.</p>

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<p>address the likely adverse impacts on the tourism sector within North Norfolk.</p>	
<p><b>15. Statement of Common Ground</b></p> <p>15.1. At the time of submission of this Local Impact Report (Deadline 1 – 16 Jan 2019), North Norfolk District Council and Vattenfall have been working together to produce a Statement of Common Ground.</p> <p>15.2. This will ensure that ahead of the Issues Specific Hearings in January 2019, there will be a clear understanding of the areas of agreement and areas of disagreement to enable focussed discussion at the Issue Specific Hearings.</p> <p>15.3. Vattenfall have confirmed that they will submit the latest iteration of the draft/interim Statement of Common Ground to the Planning Inspectorate.</p> <p>15.4. Many of the issues raised within the Statement of Common Ground are captured within this Local Impact Report.</p>	<p>Noted. The SoCG between Norfolk Vanguard Limited and North Norfolk District Council (Rep1-SOCG-17.1) was submitted for Deadline 1.</p>
<p><b>16. Conclusions</b></p> <p>16.1. North Norfolk District Council welcome and support the principle of renewable energy development to help meet the challenges of climate change and support the development of stronger and resilient electricity networks capable of reducing reliance on fossil fuels and to reduce the need to import electricity from outside of UK waters.</p> <p>16.2. North Norfolk District Council welcome the commitments made by Vattenfall including the use of HVDC transmission and the commitment to bring cables on shore via the 'long' HDD option. These are all factors which have helped to reduce the potential adverse impacts of the project.</p> <p>16.3. Nonetheless, the proposed Norfolk Vanguard project has the potential to result in some impacts across North Norfolk District, particularly during construction and it is important that those adverse impacts are reduced as much as possible and appropriate mitigation provided. Many of the potential impacts are or can be made acceptable through the drafting of any Development Consent Order.</p> <p>16.4. North Norfolk District Council will continue to work with Vattenfall to resolve outstanding matters and to ensure that the maximum amount of community benefits can be secured both through the Development Consent Order process and through individual negotiation for the wider benefit of North Norfolk.</p>	<p>The Applicant has responded to the points raised by North Norfolk District Council and will continue to engage through the SoCG (Rep1-SOCG-17.1).</p>