

**Norfolk Vanguard Offshore Wind Farm**

# **Statement of Common Ground**

**North Norfolk District Council**



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*Photo: Kentish Flats Offshore Wind Farm*

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## Table of Contents

<b>1</b>	<b>Introduction .....</b>	<b>1</b>
<b>1.1</b>	<b>The Development .....</b>	<b>1</b>
<b>1.2</b>	<b>Consultation with North Norfolk District Council .....</b>	<b>2</b>
<b>2</b>	<b>Statement of Common Ground .....</b>	<b>3</b>
<b>2.1</b>	<b>Project-wide considerations.....</b>	<b>3</b>
<b>2.2</b>	<b>Marine Geology, Oceanography and Physical Processes .....</b>	<b>5</b>
<b>2.3</b>	<b>Ground Conditions and Contamination .....</b>	<b>12</b>
<b>2.4</b>	<b>Water Resources and Flood Risk .....</b>	<b>16</b>
<b>2.5</b>	<b>Land Use and Agriculture .....</b>	<b>19</b>
<b>2.6</b>	<b>Onshore Ecology and Onshore Ornithology .....</b>	<b>23</b>
<b>2.7</b>	<b>Traffic and Transport .....</b>	<b>31</b>
<b>2.8</b>	<b>Noise, Vibration and Air Quality.....</b>	<b>34</b>
<b>2.9</b>	<b>Onshore Archaeology and Cultural Heritage.....</b>	<b>44</b>
<b>2.10</b>	<b>Landscape and Visual Impact Assessment .....</b>	<b>49</b>
<b>2.11</b>	<b>Tourism, recreation and socio-economics .....</b>	<b>57</b>

## Glossary

ADBA	Archaeological Desk Based Assessment
AMP	Access Management Plan
CIA	Cumulative Impact Assessment
CoCP	Code of Construction Practice
CWS	County Wildlife Sites
DCO	Development Consent Order
EcIA	Ecological Impact Assessment
EIA	Environmental Impact Assessment
EMP	Ecological Management Plan
ES	Environmental Statement
ETG	Expert Topic Group
GCN	Great crested newt
HIA	Health Impact Assessment
HRA	Habitats Regulations Assessment
HDD	Horizontal Directional Drilling
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
LiDAR	Light Detection and Ranging
LVIA	Landscape and Visual Impact Assessment
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MMP	Materials Management Plan
MSA	Mineral Safeguarding Areas
NNDC	North Norfolk District Council
OAMP	Outline Access Management Plan
OCoCP	Outline Code of Construction Practice
OLEMS	Outline Landscape Ecological Management Strategy
OTMP	Outline Traffic Management Plan
OTP	Outline Travel Plan
OWF	Offshore Wind Farm
PEI	Preliminary Environmental Information
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground
SPZ	Source Protection Zones
TMP	Traffic Management Plan
TP	Travel Plan
WSI	Written Scheme of Investigation

## Terminology

Array cables	Cables which link the wind turbines and the offshore electrical platform.
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.
National Grid overhead line modifications	The works to be undertaken to complete the necessary modification to the existing 400kV overhead lines
Necton National Grid substation	The existing 400kV substation near Necton, which will be the grid connection location for Norfolk Vanguard
Offshore accommodation platform	A fixed structure (if required) providing accommodation for offshore personnel. An accommodation vessel may be used instead
Offshore cable corridor	The area where the offshore export cables would be located.
Offshore electrical platform	A fixed structure located within the wind farm area, containing electrical equipment to aggregate the power from the wind turbines and convert it into a more suitable form for export to shore.
Offshore export cables	The cables which bring electricity from the offshore electrical platform to the landfall.
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 High Voltage Direct Current (HVDC) to High Voltage Alternating Current (HVAC), to 400kV (grid voltage). This also contains equipment to help maintain stable grid voltage.
The OWF sites	The two distinct offshore wind farm areas, Norfolk Vanguard East and Norfolk Vanguard West.
Trenchless crossing zone	Temporary areas required for trenchless crossing works (e.g. HDD).

## 1 INTRODUCTION

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1. This Statement of Common Ground (SoCG) has been prepared between North Norfolk District Council and Norfolk Vanguard Limited (hereafter the Applicant) to set out the areas of agreement and disagreement in relation to the Development Consent Order (DCO) application for the Norfolk Vanguard Offshore Wind Farm (hereafter ‘the project’).
2. This SoCG comprises an agreement log which has been structured to reflect topics of interest to North Norfolk District Council on the Norfolk Vanguard DCO application (hereafter ‘the Application’). Topic specific matters agreed, not agreed and actions to resolve between North Norfolk District Council and the Applicant are included. All matters agreed under this SOCG will remain agreed through the examination process, unless there is compelling evidence or sound reasons to justify a change to the status of positions previously agreed.
3. The Applicant has had regard to the Guidance for the examination of applications for development consent (Department for Communities and Local Government, 2015) when compiling this SoCG. Points that are not agreed will be the subject of ongoing discussion wherever possible to resolve or refine the extent of disagreement between the parties.

### 1.1 The Development

4. The Application is for the development of the Norfolk Vanguard Offshore Wind Farm (OWF) and associated infrastructure. The OWF comprises two distinct areas, Norfolk Vanguard (NV) East and NV West (‘the OWF sites’), which are located in the southern North Sea, approximately 70km and 47km from the nearest point of the Norfolk coast respectively. The location of the OWF sites is shown in Chapter 5 Project Description Figure 5.1 of the Application. The OWF would be connected to the shore by offshore export cables installed within the offshore cable corridor from the OWF sites to a landfall point at Happisburgh South, Norfolk. From there, onshore cables would transport power over approximately 60km to the onshore project substation and grid connection point near Necton, Norfolk.
5. Once built, Norfolk Vanguard would have an export capacity of up to 1800MW, with the offshore components comprising:
  - Wind turbines;
  - Offshore electrical platforms;
  - Accommodation platforms;
  - Met masts;
  - Measuring equipment (LiDAR and wave buoys);

- Array cables;
  - Interconnector cables; and
  - Export cables.
6. The key onshore components of the project are as follows:
- Landfall;
  - Onshore cable route, accesses, trenchless crossing technique (e.g. Horizontal Directional Drilling (HDD)) zones and mobilisation areas;
  - Onshore project substation; and
  - Extension to the existing Necton National Grid substation and overhead line modifications.

## 1.2 Consultation with North Norfolk District Council

7. This section briefly summarises the consultation that the Applicant has had with North Norfolk District Council. For further information on the consultation process please see the Consultation Report (document reference 5.1 of the Application).

### 1.2.1 Pre-Application

8. The Applicant has engaged with North Norfolk District Council on the project during the pre-Application process, both in terms of informal non-statutory engagement and formal consultation carried out pursuant to Section 42 of the Planning Act 2008.
9. During formal (Section 42) consultation, North Norfolk District Council provided comments on the Preliminary Environmental Information Report (PEIR) by way of a letter dated 8<sup>th</sup> December 2017.
10. Further to the statutory Section 42 consultation, several meetings were held with North Norfolk District Council through the Evidence Plan Process. These are detailed throughout the SoCG and minutes of the meetings are provided in Appendices 9.15 – 9.26 (pre-Section 42) and Appendices 25.1 – 25.9 (post-Section 42) of the Consultation Report (document reference 5.1 of the Application).

### 1.2.2 Post-Application

11. This is a live document that is being updated as the project progresses. The original draft was produced prior to the publishing of the Relevant Representations. This current draft takes into account information provided by North Norfolk District Council within their Local Impact Report and further information submitted to the examination at Deadline 3.

## 2 STATEMENT OF COMMON GROUND

12. Within the sections and tables below, the different topics and areas of agreement and disagreement between North Norfolk District Council and the Applicant are set out.

### 2.1 Project-wide considerations

13. Table 1 provides areas of agreement and disagreement for project-wide considerations.

**Table 1 Project-wide considerations**

Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
<b>Policy and legislation</b>		
The principle of offshore wind is supported, as Norfolk Vanguard accords with national renewable energy targets and objectives.	North Norfolk District Council is fully supportive of the principle of renewable energy development in helping to tackle the challenges faced by climate change. NNDC 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.	<b>Agreed</b>
<b>Site selection</b>		
The adoption of the long HDD at the landfall is considered the preferred option. This was agreed via PEIR feedback in December 2017.	NNDC are fully supportive of the use of the HDD long drill to bring cables onshore as part of a HVDC transmission system.	<b>Agreed</b>
The principles adopted in undertaking the site selection (Chapter 4 Site Selection and Assessment of Alternatives) for Norfolk Vanguard are appropriate and robust.	Whilst the District Council were not in a position to directly influence the location of a grid connection offer made to Vattenfall by National Grid Electricity Transmission Limited, once the grid offer location was known and landfall options were narrowed down to three locations, NNDC worked with Vattenfall to identify the most appropriate locations which, up until after PEIR stage, involved the prospect of cable relay stations within North Norfolk. Advice was given as to the favoured location with a view to limiting the potential adverse impacts from cable relay stations as well as advice provided in relation to the most appropriate method to bring cables onshore. Only after PEIR stage was the commitment made to use HVDC and the long HDD option to bring cables onshore.	<b>Agreed</b>
The search areas used for the site selection process and the methodology used for refining these areas is considered robust and appropriate.		



Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
	<p>The only area where the District Council would question the grid offer choices made by National Grid Electricity Transmission Limited is the consequence of cables for Vattenfall Vanguard (and Vattenfall Boreas) and cables for other wind farm proposals (Ørsted Hornsea Project Three) crossing at a location south of the North Norfolk District. Whilst this does not affect North Norfolk and it is through no fault of Vattenfall or Ørsted, North Norfolk District Council believes it does emphasise the need for better joined-up thinking by National Grid on large infrastructure projects such as these as well as a need to improve network capacity generally. North Norfolk District Council has previously raised this issue with the Secretary of State for Business, Energy and Industrial Strategy directly and with senior officers at National Grid Electricity Transmission Limited.</p>	
<b>Health Impact Assessment (HIA)</b>		
<p>The methodology adopted for the HIA (Chapter 27 Human Health) is appropriate and robust, and the outcome of the assessment is suitable.</p>	<p>NNDC agree with the general methodology adopted. Once constructed the impacts of the proposal on human health are likely to be benign. However, it is the impact during construction which has the greatest potential to impact upon human health and these impacts are covered within other sections of the Environmental Statement where further comment is provided.</p>	<b>Agreed</b>
<b>Discharge of Requirements (DCO Schedule 15)</b>		
<p>The Applicant is reviewing NNDC's comments on Schedule 15 of the draft DCO and a revised draft DCO will be submitted at deadline 4 alongside an explanation of any changes made (either through the Explanatory Memorandum or the DCO Schedule of Changes).</p>	<p>NNDC is content for the DCO to contain the process for discharging requirements set out in Schedule 15, with the suggested modifications submitted by NNDC to the examination at Deadline 3.</p>	<b>Under discussion</b>

## 2.2 Marine Geology, Oceanography and Physical Processes

14. The project has the potential to impact upon marine geology, oceanography and physical processes. Chapter 8 of the Norfolk Vanguard Environmental Statement (ES) (document reference 6.1 of the Application) provides an assessment of the significance of these impacts.
15. Table 2 provides an overview of meetings and correspondence undertaken with North Norfolk District Council regarding marine geology, oceanography and physical processes.
16. Table 3 provides areas of agreement and disagreement regarding marine geology, oceanography and physical processes.
17. Further details on the Evidence Plan for marine geology, oceanography and physical processes can be found in Appendix 9.16 and Appendix 25.6 of the Consultation Report (document reference 5.1 of the Application).

**Table 2 Summary of Consultation with North Norfolk District Council regarding marine geology, oceanography and physical processes**

Date	Contact Type	Topic
<b>Pre-Application</b>		
2 <sup>nd</sup> February 2017	Email from the Applicant	Provision of the Marine Physical Processes Method Statement (see Appendix 9.2 of the Consultation Report).
06 <sup>th</sup> March 2017	Meeting with RHDHV (Peterborough)	Meeting to discuss specific considerations around the landfall, cable relay station, and onshore cable corridor within the NNDC district boundary.
22 <sup>nd</sup> June 2017	Email from the Applicant	Offshore Habitats Regulations Assessment (HRA) Screening provided for consultation.
22 <sup>nd</sup> June 2017	Email from the Applicant	Provision of draft PEIR documents (Chapter 8 and Appendix 10.1 of the ES (Fugro survey report) and Offshore HRA Screening (Appendix 5.1 of the HRA (document 5.3)) to inform discussions at the Norfolk Vanguard Benthic Ecology and Marine Physical Processes Expert Topic Group meeting.
5 <sup>th</sup> July 2017	Meeting	Benthic and Intertidal Ecology and Marine Physical Processes Pre- Preliminary Environmental Information (PEI) Expert Topic Group (ETG) Meeting.
8 <sup>th</sup> December 2017	Letter from North Norfolk District Council	PEIR feedback

Date	Contact Type	Topic
19 <sup>th</sup> January 2018	Email from the Applicant	Provision of the Norfolk Vanguard Export Cable Installation Study (Appendix 5.1 of the ES)
<b>Post-Application</b>		
16 <sup>th</sup> September 2018	Relevant Representation	Initial feedback from NNDC on the DCO application
19 <sup>th</sup> September 2018	Email from the Applicant	Draft SoCG provided for review
14 <sup>th</sup> December 2018	Email from NNDC	Comments on the SoCG
16 <sup>th</sup> January 2019	Local Impact Report	Outlining NNDC's position on the application.
14 <sup>th</sup> February 2019	Post hearing submission	Deadline 3 submission responding to points raised during the issue specific hearings

**Table 3 Statement of Common Ground - marine geology, oceanography and physical processes**

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
Existing Environment	Survey data collected for Norfolk Vanguard for the characterisation of Marine Geology, Oceanography and Physical Processes are suitable for the assessment.	NNDC's jurisdiction only extends down to MLWS. NNDC will rely on other consultees to comment on survey data collected beyond this point.	<b>Agreed down to MLWS</b>
	The ES adequately characterises the baseline environment in terms of Marine Geology, Oceanography and Physical Processes.		
Assessment methodology	Appropriate legislation, planning policy and guidance relevant to Marine Geology, Oceanography and Physical Processes has been used.	Whilst no reference has been made to NNDC Core Strategy Policy EN 11, reference has been made to the relevant Shoreline Management Plan. The key issue is the effect of the proposed development on coastal processes and coastal erosion and the decision to use the 'long' HDD option to bring cable onshore will be unlikely to result in adverse coastal impacts (subject to, inter alia, an agreed CoCP and decommissioning plans)	<b>Agreed</b>
	The list of potential impacts assessed for Marine Geology, Oceanography and Physical Processes is appropriate.	NNDC's jurisdiction only extends down to MLWS. NNDC will rely on other consultees to comment on list of impacts beyond this point.	<b>Agreed down to MLWS</b>
	The worst-case scenario used in the assessment for Marine Geology, Oceanography and Physical Processes is appropriate.  The Applicant is open to discussing the feasibility of providing spoil to NNDC post-consent, should NNDC wish to proceed with seeking a licence to infill the Cart Gap seawall.	NNDC welcome the position set out by Vattenfall at paragraph 384 of Chapter 8 of the Environmental Statement which states:  <i>'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</i>	<b>Agreed but with further ongoing discussions about Cart Gap sea wall.</b>

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
		<p> <i>which the cables 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’.</i> </p> <p>This represents the best option for NNDC.</p> <p>           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. NNDC welcomes the applicant’s confirmation that they are open to discussing the feasibility of providing clean spoil to NNDC post-consent, should NNDC wish to proceed with seeking a licence to infill the Cart Gap seawall. Given the potential for re-use of spoil to reduce overall         </p>	

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
		<p>traffic movements, NNDC would be happy to work with the applicant and relevant land owners to take forward this opportunity. This could be secured within the final DCO either as part of the CoCP (as part of Soil Management, as a Construction Method Statement or as part of the Site and Excavated Waste Management (with a specific new topic covering re-use of clean spoil)) or other relevant documents to be determined between the parties.</p> <p>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>In the likely event of the DCO being granted, <b>NNDC would not expect</b> 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' amendments 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>	
Assessment findings	The characterisation of receptor sensitivity is appropriate.		<b>Agreed</b>

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
	<p>The magnitude of effect is correctly identified</p> <p>The impact significance conclusions of negligible significance for Norfolk Vanguard alone are appropriate.</p> <p>Norfolk Vanguard Ltd is committed to ensuring the landfall HDD is at a sufficient depth below the coastal shore platform and cliff base in order to have no effect on coastal erosion (ES Chapter 8, section 8.7.4.1 Embedded Mitigation and Table 8.38) and remain resilient to the effects of coastal erosion for its anticipated lifetime. Table 8.37 refers to the potential effects of cable protection at the subtidal landfall HDD exit points.</p>	<p>NNDC's jurisdiction only extends down to MLWS. NNDC will rely on other consultees to comment on characterisation of receptor sensitivity beyond this point.</p> <p>Whilst NNDC generally agree with characterisation of receptor sensitivity and bringing cables onshore via 'long' HDD is the preferred method, it has to be recognised that HDD is an intrusive process which is not easily reversible once completed. NNDC would want to ensure the Environmental Statement recognises this (Table 8.37 and 8.38 in Chapter 8 are perhaps unclear on this point).</p> <p>The presumption by the applicant at ISH1 that coastal erosion equilibrium will be reached in the future is possible but it is for Vattenfall to consider in relation to the location and resilience of their assets for their designed life. It is understood that the assets to be placed within the 100year coastal erosion zone would be the cables that are to be routed below the predicted level of beaches.</p> <p>The key issue for NNDC is ensuring that that the landfall location remains resilient from the effects of coastal erosion for its anticipated lifetime.</p>	

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
Cumulative Impact Assessment (CIA)	The plans and projects considered within the CIA are appropriate.	Agreed	<b>Agreed</b>
	The CIA methodology is appropriate.	Agreed	<b>Agreed</b>
	The cumulative impact conclusions of negligible significance are appropriate.	Agreed	<b>Agreed</b>
Mitigation and Management	The use of long HDD at landfall would prevent any interference with coastal processes. This was agreed via PEIR feedback in December 2017.	NNDC consider the 'long' HDD option represents the best and preferred option. Whilst it cannot be categorically ruled out that this option would 'prevent any interference with coastal processes', as the best-case scenario option, any impact on coastal processes would be considered negligible by NNDC.	<b>Agreed</b>
	Given the impacts of the project, the proposed mitigation and monitoring is adequate.  Embedded mitigation, identified in ES Chapter 8, section 8.7.4.1 (which includes long HDD as required under DCO Schedule 1 Part 3 Requirement 17(2)) has been considered as part of the project design when undertaking the impact assessment. This is therefore a component of the impact significance summarised in Table 8.45 and no further mitigation is proposed in order to further reduce the residual impact significance.	Agreed on the basis that the landfall location remains resilient from the effects of coastal erosion for its anticipated lifetime.	<b>Agreed</b>
Wording of Requirement(s)	Part 4 of Schedules 9, 10, 11 and 12 of the DCO appropriately reflects the commitments made in the ES.	These parts of the DCO relate to matters outside of NNDC jurisdiction.	<b>N/A</b>



### 2.3 Ground Conditions and Contamination

18. The project has the potential to impact upon ground conditions and contamination. Chapter 19 of the ES, (document reference 6.1.19 of the Application), provides an assessment of the significance of these impacts.
19. Table 4 provides an overview of meetings and correspondence undertaken with North Norfolk District Council regarding ground conditions and contamination.
20. Table 5 provides areas of agreement and disagreement regarding ground conditions and contamination.
21. Further details on the Evidence Plan for ground conditions and contamination can be found in Appendix 9.20 and Appendix 25.2 of the Consultation Report (document reference 5.1 of the Application).

**Table 4 Summary of Consultation with North Norfolk District Council regarding ground conditions and contamination**

Date	Contact Type	Topic
<b>Pre-Application</b>		
8 <sup>th</sup> December 2017	Letter	PEIR response
4 <sup>th</sup> April 2018	Email	Request for confirmation of projects to be included in the CIA.
<b>Post-Application</b>		
16 <sup>th</sup> September	Relevant Representation	Initial feedback from NNDC on the DCO application
19 <sup>th</sup> September	Email from the Applicant	Draft SoCG provided for review
14 <sup>th</sup> December	Email from NNDC	Comments on the SoCG
16th January 2019	Local Impact Report	Outlining NNDC's position on the application.
14th February 2019	Post hearing submission	Deadline 3 submission responding to points raised during the issue specific hearings

**Table 5 Statement of Common Ground - ground conditions and contamination**

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
Existing Environment	<p>Sufficient survey data has been collected to inform the assessment presented within the submitted Environment Statement.</p> <p>As stated in section 19.7.5.6 of Chapter 19 Ground Conditions and Contamination and section 6.1 of the CoCP, further consideration of ground contamination will be undertaken pre-construction and <i>“a written scheme (based on the Model procedures for the management of land contamination, CLR11) for the management of contamination of any land and groundwater would be submitted and approved by the relevant local authority and will be informed by further site investigation where appropriate. The document will also provide procedures to follow in the event of encountering unexpected contamination and will include proposals to deal with any waste soils excavated during the works.”</i> This is secured through Requirement 20 of the DCO and the relevant</p>	<p>Chapter 19.5.3 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 construction phase.</p> <p>This said, the key factor is to ensure there is an appropriate strategy in place to deal with contamination should it arise and NNDC is now generally content that an appropriate strategy can be secured within the DCO and CoCP.</p>	<b>Agreed</b>
Assessment methodology	<p>The impact assessment methodologies used (as proposed in the Evidence Plan method statement provided in January 2017) for the Environmental Impact Assessment (EIA) represent an appropriate approach to assessing potential impacts of the project.</p>	Agreed	<b>Agreed</b>

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
	The worst-case scenario presented in the assessment is appropriate.	Agreed	<b>Agreed</b>
Assessment findings	The assessment adequately characterises the baseline environment in terms of ground conditions and contamination.	Agreed – Information provided within Chapter 19 paragraph 19.7 provides a sound characterisation.	<b>Agreed</b>
	The assessment of impacts for construction, operation and decommissioning presented is appropriate and, assuming the inclusion of the embedded mitigation described, impacts on ground conditions and contamination are likely to be non-significant in EIA terms.	Agreed subject to agreement of final wording for Requirement 20 within the draft DCO.	<b>Agreed</b>
	The assessment of cumulative impacts is appropriate and, assuming the inclusion of the embedded mitigation described, cumulative impacts on ground conditions and contamination are likely to be non-significant in EIA terms.	Agreed	<b>Agreed</b>
Approach to mitigation	The provision of a Materials Management Plan (MMP) is considered suitable to mitigate impacts on Mineral Safeguarding Areas (MSA).	NNDC would defer consideration to Norfolk County Council as the relevant Mineral Authority	<b>N/A</b>
	Given the impacts of the project, the mitigation proposed for ground conditions and contamination is considered appropriate and adequate.	Agreed subject to agreement of final wording for Requirement 20 within the draft DCO	<b>Agreed</b>

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
	The approach to mitigating potential impacts on Source Protection Zones (SPZ) at trenchless crossings, including undertaking pre-construction ground investigations and hydrogeological risk assessments is considered appropriate.	NNDC would defer consideration to the Environment Agency who would be better placed to comment on the potential impact on Source Protection Zones (SPZ).	<b>N/A</b>
Wording of Requirement(s)	The wording of Requirements provided within the draft DCO (and supporting certified documents) for the mitigation of impacts associated with ground conditions and contamination are considered appropriate and adequate.	Agreed subject to agreement of final wording for Requirement 20 within the draft DCO to ensure it can deliver what is expected.	<b>Agreed</b>

## 2.4 Water Resources and Flood Risk

22. The project has the potential to impact upon water resources and flood risk. Chapter 20 of the ES (document reference 6.1 of the Application) provides an assessment of the significance of these impacts.
23. Table 6 provides an overview of meetings and correspondence undertaken with North Norfolk District Council regarding water resources and flood risk.
24. Table 7 provides areas of agreement and disagreement regarding water resources and flood risk.
25. Further details on the Evidence Plan for water resources and flood risk can be found in Appendix 9.20 and Appendix 25.2 of the Consultation Report (document reference 5.1 of the Application).

**Table 6 Summary of Consultation with North Norfolk District Council regarding water resources and flood risk**

Date	Contact Type	Topic
<b>Pre-Application</b>		
8 <sup>th</sup> December 2017	Letter	PEIR response
4 <sup>th</sup> April 2018	Email	Request for confirmation of projects to be included in the CIA.
<b>Post-Application</b>		
16 <sup>th</sup> September	Relevant Representation	Initial feedback from NNDC on the DCO application
19 <sup>th</sup> September	Email from the Applicant	Draft SoCG provided for review
14 <sup>th</sup> December	Email from NNDC	Comments on the SoCG

**Table 7 Statement of Common Ground - water resources and flood risk**

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
Existing Environment	Sufficient survey data has been collected to inform the assessment.	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.	<b>N/A</b>
Assessment methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the project. This was discussed in the ETG meeting in January 2017, where concerns were raised over the methodology by the Environment Agency. This led to a revision of the methodology.		
	The worst-case scenario presented in the assessment is appropriate.		
Assessment findings	The ES adequately characterises the baseline environment in terms of water resources and flood risk.		
	The assessment of impacts for construction, operation and decommissioning presented are consistent with the agreed assessment methodologies.		
	The assessment of cumulative impacts is consistent with the agreed methodologies.		
Approach to mitigation	The proposed locations for trenchless crossing techniques are appropriate and will be explored further and details agreed at each location at detailed design stage.		
	The mitigation proposed for water resources is appropriate and adequate.		

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
	The mitigation proposed for managing flood risk is appropriate and adequate.		
Wording of Requirement(s)	The wording of Requirement 20 provided within the draft DCO (and supporting certified documents) for the mitigation of impacts to water resources and flood risk are considered appropriate and adequate.		

## 2.5 Land Use and Agriculture

26. The project has the potential to impact upon land use and agriculture. Chapter 21 of the ES, (document reference 6.1.21 of the Application), provides an assessment of the significance of these impacts.
27. Table 8 provides an overview of meetings and correspondence undertaken with North Norfolk District Council regarding land use and agriculture.
28. Table 9 provides areas of agreement and disagreement regarding land use and agriculture.
29. Further details on the Evidence Plan for land use and agriculture can be found in Appendix 9.18 and Appendix 25.3 of the Consultation Report (document reference 5.1 of the Application).

**Table 8 Summary of Consultation with North Norfolk District Council regarding land use and agriculture**

Date	Contact Type	Topic
<b>Pre-Application</b>		
14 <sup>th</sup> January 2017	Email	Provision of Land Use method statement
8 <sup>th</sup> December 2017	Letter	PEIR response
4 <sup>th</sup> April 2018	Email	Request for confirmation of projects to be included in the CIA.
<b>Post-Application</b>		
16 <sup>th</sup> September	Relevant Representation	Initial feedback from NNDC on the DCO application
19 <sup>th</sup> September	Email from the Applicant	Draft SoCG provided for review
14 <sup>th</sup> December	Email from NNDC	Comments on the SoCG



**Table 9 Statement of Common Ground - land use and agriculture**

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
Existing Environment	Sufficient survey data has been collected to undertake the assessment	Chapter 21 of the Environmental Statement (21.5 and 21.6) provide a good basis to undertake the assessment	<b>Agreed</b>
Assessment methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the project.	Agreed	<b>Agreed</b>
	The worst-case scenario presented in the assessment, is appropriate	Agreed	<b>Agreed</b>
	The ES adequately characterises the baseline environment in terms of land use and agriculture.	Agreed	<b>Agreed</b>
Assessment findings	<p>The assessment of impacts for construction, operation and decommissioning presented is appropriate and, assuming the inclusion of the embedded mitigation described, impacts on land use and agriculture are likely to be non-significant in EIA terms.</p> <p>Embedded mitigation includes:</p> <ul style="list-style-type: none"> <li>• Commitment to HVDC;</li> <li>• Ducting installed for both Norfolk Vanguard and Norfolk Boreas as the same time (subject to both projects receiving consent); and</li> <li>• Sectionalised approach to works, whereby works are undertaken on a 150m section at a time and each section reinstated before moving onto the next 150m section.</li> </ul> <p>Additional mitigation committed to within the CoCP and secured through Requirement 20 includes:</p> <ul style="list-style-type: none"> <li>• Production of Soil Management Plan (setting out procedures for soil handling and storage); and</li> </ul>	<p>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>	<b>Agreed</b>

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
	<ul style="list-style-type: none"> <li>A local specialised drainage contractor will undertake surveys to locate drains in consultation with landowners to create drawings both pre- and post-construction, and ensure appropriate reinstatement.</li> </ul> <p>Engagement with landowners is currently underway as part of landowner agreement discussions.</p>	<p>NNDC welcome the suggested embedded mitigation and additional mitigation committed to within the CoCP and secured through Requirement 20.</p>	
	<p>The assessment of cumulative impacts is appropriate and, assuming the inclusion of the embedded mitigation described, cumulative impacts on land use and agriculture are likely to be non-significant in EIA terms.</p>	<p>Agreed</p>	<p><b>Agreed</b></p>
<p>Approach to mitigation</p>	<p>The mitigation proposed for land use and agriculture are considered appropriate and adequate.</p>	<p>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><b>Agreed</b></p>

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
		NNDC welcome the suggested embedded mitigation and additional mitigation committed to within the CoCP and secured through Requirement 20.	

## 2.6 Onshore Ecology and Onshore Ornithology

30. The project has the potential to impact upon onshore ecology and onshore ornithology. Chapter 22 and 23 of the ES, (document reference 6.1.22 and 6.1.23 of the Application), provides an assessment of the significance of these impacts.
31. Table 10 provides an overview of meetings and correspondence undertaken with North Norfolk District Council regarding onshore ecology and onshore ornithology.
32. Table 11 provides areas of agreement and disagreement regarding onshore ecology and onshore ornithology.
33. Further details on the Evidence Plan for onshore ecology and onshore ornithology can be found in Appendix 9.19 and Appendix 25.1 of the Consultation Report (document reference 5.1 of the Application).

**Table 10 Summary of Consultation with North Norfolk District Council regarding onshore ecology and onshore ornithology**

Date	Contact Type	Topic
<b>Pre-Application</b>		
14 <sup>th</sup> January 2017	Email	Provision of the Onshore Ecology and Onshore Ornithology Method Statement (provided in Appendix 9.3).
8 <sup>th</sup> December 2017	Letter	PEIR response
22 <sup>nd</sup> January 2018	Meeting	Onshore Ecology ETG meeting - PEIR comments and approach to updating assessments.
9 <sup>th</sup> February 2018	Email	Provision of the Norfolk Vanguard Bat Activity Survey Report.
22 <sup>nd</sup> February 2018	Email	Provision of draft Norfolk Vanguard Information to Support HRA.
4 <sup>th</sup> April 2018	Email	Request for confirmation of projects to be included in the CIA.
<b>Post-Application</b>		
16 <sup>th</sup> September	Relevant Representation	Initial feedback from NNDC on the DCO application
19 <sup>th</sup> September	Email from the Applicant	Draft SoCG provided for review

Date	Contact Type	Topic
14 <sup>th</sup> December	Email from NNDC	Comments on the SoCG
16th January 2019	Local Impact Report	Outlining NNDC's position on the application.
14th February 2019	Post hearing submission	Deadline 3 submission responding to points raised during the issue specific hearings

**Table 11 Statement of Common Ground - onshore ecology and onshore ornithology**

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
Survey methodology	Survey methodologies for Phase 1 Habitat Surveys are appropriate and sufficient.	Agreed	<b>Agreed</b>
	Survey methodologies for Phase 2 Surveys are appropriate and sufficient.	Agreed	<b>Agreed</b>
Existing Environment	<p>Survey data collected for Norfolk Vanguard for the characterisation of onshore ecology and ornithology are suitable to inform the assessment.</p> <p>Where access for surveys was not possible a precautionary approach was adopted, i.e. assuming that relevant receptors were present, and this was captured within the assessment and a commitment to pre-construction surveys of the 'unsurveyed' areas has been made. This is set out for each ecological receptor within ES and committed to within the Outline Landscape and Environmental Management Strategy (OLEMS) and secured through Requirement 24 Ecological Management Plan.</p>	<p>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 and Volume 1 Chapter 23 Onshore Ornithology. 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.</p> <p>Post-consent surveying needs to be secured within the DCO. NNDC will work with Vattenfall to ensure key ecological objectives are met.</p>	<b>Agreed</b>
Assessment methodology	Appropriate legislation, planning policy and guidance relevant to ecology and ornithology has been considered for the project (listed in section 22.2 and 23.2 in Chapter 22 Onshore Ecology and Chapter 23 Onshore Ornithology respectively).	Agreed	<b>Agreed</b>

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
	The list of potential impacts on onshore ecology and onshore ornithology assessed is appropriate	Agreed	<b>Agreed</b>
	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the project.	Agreed	<b>Agreed</b>
	The worst-case scenario presented in the ES, is appropriate for the project.	Agreed	<b>Agreed</b>
Assessment findings	<p>The assessment of impacts for construction, operation and decommissioning presented is appropriate.</p> <p>The assessment of cumulative impacts is appropriate.</p>	<p>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 and Volume 1 Chapter 23 Onshore Ornithology. 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>	<b>Under Discussion</b>
Approach to mitigation	All mitigation measures that have been identified as required, as well as commitments to complete the ecological surveys for previously inaccessible areas are outlined in the OLEMS.	NNDC will work with Vattenfall to ensure key ecological objectives are met.	<b>Under Discussion</b>

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
	<p>The evidence that NNDC has submitted to the examination at Deadline 3 regarding the period of aftercare for replacement planting relates to woodland planting.</p> <p>Within North Norfolk District the Applicant is not proposing any tree planting. There are no wooded areas that will be directly affected by the onshore cable route in North Norfolk District. The cable route crosses a number of hedgerows, some of which will have occasional individual trees. The Applicant has committed to micrositing the cable route to avoid individual trees in hedgerows where possible – the width of the hedgerow crossings are reduced from 45m to 20m to achieve this. Due to the nature of the installed infrastructure the Applicant cannot replace individual trees on top of the buried cables. The replacement planting within North Norfolk District is therefore related to replacement hedgerows only. Hedgerow planting will typically mature within 3-5 years. On this basis, the Applicant feels that a commitment to 5 years aftercare is appropriate.</p>	<p>NNDC have evidenced why a ten year rather than a five-year replacement planting period should be applied to the Norfolk Vanguard DCO under requirement 19 (2). The further evidence to support this request was submitted by NNDC to the examination at Deadline 3. Similar evidence was presented to the ExA for Ørsted Hornsea Project Three and, in the Examining Authority’s schedule of changes to the draft Development Consent Order for HP3 (issued 26 Feb 2019), the ExA in that DCO have now indicated that they are minded to agree to a ten-year replacement planting period. Accordingly, the ExA are invited to take a similar approach with Norfolk Vanguard.</p> <p>NNDC are disappointed that the applicant considers no replacement trees are to be provided within the NNDC authority area. In respect of replacement planting, it is the expectation of NNDC that where trees are to be removed along the cable route (for example, where removal cannot reasonably be avoided), these should be replaced within reasonable proximity as part of the Provision of Landscaping (DCO Requirement 18) and appropriately managed as part of the Implementation and Maintenance of Landscaping (DCO Requirement 19) for a period of ten years after planting.</p>	<p><b>Under discussion</b></p>



Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
	<p>The use of trenchless crossing techniques at County Wildlife Sites (CWS) is acceptable subject to detailed design.</p>	<p>Agreed</p>	<p>Agreed</p>
	<p>The provision of an Ecological Management Plan (EMP) (based on the OLEMS submitted with the DCO application, document reference 8.7) is considered suitable to ensure potential impacts identified in the Ecological Impact Assessment (EclA) are reduced to a non-significant level.</p> <p>The OLEMs sets out the commitments to undertake pre-construction surveys for all ecological receptors, including all unsurveyed areas.</p> <p>Requirement 24 sets out that no stage of the onshore transmission works may commence until for that stage a written ecological management plan (<b>which accords with the OLEMS</b>) has been submitted to and approved by the relevant planning authority in consultation with Natural England.</p>	<p>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>The applicant still does not seem to acknowledge the need to secure ecological surveying at an appropriate time to inform DCO requirement 24 and 28. This is critical if the EMP is to fulfil its intended purpose. It remains unclear whether pre-commencement site clearance works can take place before surveying as this is not easily identifiable within the OLEMS (Section 5)</p>	<p>Under Discussion</p>

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
	The mitigation proposed for bats is appropriate and proportionate.	NNDC will work with Vattenfall to ensure key ecological objectives in relation to bats are met.	<b>Under Discussion</b>
	The mitigation proposed for great crested newts (GCN) is appropriate and proportionate (as outlined in the draft GCN mitigation licence).	NNDC will work with Vattenfall to ensure key ecological objectives in relation to GCN are met.	<b>Under Discussion</b>
Screening of Likely Significant Effects (LSE)	The methodology and sites screened in for the HRA as presented in Appendix 5.2 of the Information to Support HRA report (Application document 5.3) are considered appropriate, considering sites within 5km of onshore infrastructure.	Agreed	<b>Agreed</b>
	The approach to HRA screening is appropriate. The following sites are screened in for further assessment: <ul style="list-style-type: none"> <li>• River Wensum;</li> <li>• Paston Great Barn; and</li> <li>• Norfolk Valley Fens.</li> </ul>	Agreed	<b>Agreed</b>
Assessment of Adverse Effect on Integrity	The approach to the assessment is appropriate.	Agreed	<b>Agreed</b>
	The conclusions of no adverse effect on site integrity in the Information to Support HRA report (document reference 5.3) are appropriate.	This is a matter for the ExA to determine	<b>N/A</b>

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
Wording of Requirement(s)	<p>Requirement 24 provided within the draft DCO (and supporting certified documents) for the mitigation of impacts to onshore ecology and ornithology are considered appropriate and adequate.</p> <p>Requirement 24 sets out that no stage of the onshore transmission works may commence until for that stage a written ecological management plan (<b>which accords with the OLEMS</b>) has been submitted to and approved by the relevant planning authority in consultation with Natural England.</p>	<p>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.</p> <p>The applicant still does not seem to acknowledge the need to secure ecological surveying at an appropriate time to inform DCO requirement 24 and 28. This is critical if the EMP is to fulfil its intended purpose. It remains unclear whether pre-commencement site clearance works can take place before surveying as this is not easily identifiable within the OLEMS (Section 5)</p> <p>NNDC will work with Vattenfall to ensure key ecological objectives are met.</p>	<b>Under Discussion</b>

## 2.7 Traffic and Transport

34. The project has the potential to impact upon traffic and transport. Chapter 24 of the ES (document reference 6.1 of the Application) provides an assessment of the significance of these impacts.
35. Table 12 provides an overview of meetings and correspondence undertaken with North Norfolk District Council regarding traffic and transport.
36. Table 13 provides areas of agreement and disagreement regarding traffic and transport.
37. Further details on the Evidence Plan for traffic and transport can be found in Appendix 9.21 and Appendix 25.5 of the Consultation Report (document reference 5.1 of the Application).

**Table 12 Summary of Consultation with North Norfolk District Council regarding traffic and transport**

Date	Contact Type	Topic
<b>Pre-Application</b>		
14 <sup>th</sup> January 2017	Email	Provision of the Traffic and Transport, Air Quality and Noise Method Statements.
8 <sup>th</sup> December 2017	Letter	PEIR response
4 <sup>th</sup> April 2018	Email	Request for confirmation of projects to be included in the CIA.
<b>Post-Application</b>		
16 <sup>th</sup> September	Relevant Representation	Initial feedback from NNDC on the DCO application
19 <sup>th</sup> September	Email from the Applicant	Draft SoCG provided for review
14 <sup>th</sup> December	Email from NNDC	Comments on the SoCG

**Table 13 Statement of Common Ground - traffic and transport**

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
Existing Environment	Sufficient survey data (extent/duration) has been collected to inform the characterisation of the baseline environment.	<p data-bbox="1205 331 1610 651">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> <p data-bbox="1205 724 1610 1011">In respect of DCO requirements 21 and 22, NNDC note the use of the word ‘must’ across these requirements. It is recommended to substitute the word ‘must’ for ‘shall’ otherwise there is no option to amend/improve proposals which differ from the OTMP, OTP, OAMP, which would be counter intuitive.</p>	<b>N/A</b>
Assessment methodology	The impact assessment methodologies used for the assessment represent an appropriate approach to assessing potential impacts.		
	The assessment adequately defines the realistic worst-case scenario (RWCS) for traffic demand.		
	The assessment adequately defines the realistic worst-case scenario for employee distribution.		
	The assessment adequately characterises the baseline environment in terms of traffic and transport.		
Assessment findings	The assessment of impacts for construction, operation and decommissioning presented adheres to the agreed assessment methodology and the level of impacts are appropriate.		
Approach to mitigation	The production of an enhanced Traffic Management Plan (TMP), Travel Plan (TP) and Access Management Plan (AMP) (based on the outline documents submitted with the DCO application, document reference 8.8, 8.9 and 8.10) provides sufficient mitigation for potential impacts on traffic and transport.		
	Significant residual impacts for Norfolk Vanguard alone are predicted at a single link - Link 69 (Little London Road). The mitigation proposed at this location is considered appropriate and proportionate.		

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
Wording of Requirement(s)	The wording of Requirement 21 and 22 provided within the draft DCO (and supporting certified documents) for the mitigation of impacts to traffic and transport are considered appropriate and adequate.		

## 2.8 Noise, Vibration and Air Quality

38. The project has the potential to impact upon noise, vibration and air quality receptors. Chapter 25 and 26 of the ES, (document reference 6.1.25 and 6.1.26 of the Application), provides an assessment of the significance of these impacts.
39. Table 14 provides an overview of meetings and correspondence undertaken with North Norfolk District Council regarding noise, vibration and air quality.
40. Table 15 provides areas of agreement and disagreement regarding noise, vibration and air quality.
41. Further details on the Evidence Plan for noise, vibration and air quality can be found in Appendix 9.25 and Appendix 25.10 of the Consultation Report (document reference 5.1 of the Application).

**Table 14 Summary of Consultation with North Norfolk District Council regarding noise, vibration and air quality**

Date	Contact Type	Topic
<b>Pre-Application</b>		
14 <sup>th</sup> January 2017	Email	Provision of the Traffic and Transport, Air Quality and Noise Method Statements.
29 <sup>th</sup> March 2017	Email	Provision of the proposed locations for the onshore noise and vibration monitoring survey.
20 <sup>th</sup> July 2017	Meeting	Onshore Noise Pre-PEI ETG Meeting: Project update and overview of results to date
8 <sup>th</sup> December 2017	Letter	PEIR response
4 <sup>th</sup> April 2018	Email	Request for confirmation of projects to be included in the CIA.
<b>Post-Application</b>		
16 <sup>th</sup> September	Relevant Representation	Initial feedback from NNDC on the DCO application
19 <sup>th</sup> September	Email from the Applicant	Draft SoCG provided for review
14 <sup>th</sup> December	Email from NNDC	Comments on the SoCG
16 <sup>th</sup> January 2019	Local Impact Report	Outlining NNDC's position on the application.

Date	Contact Type	Topic
14th February 2019	Post hearing submission	Deadline 3 submission responding to points raised during the issue specific hearings



**Table 15 Statement of Common Ground – noise, vibration and air quality**

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
Existing Environment	<p>Sufficient survey data (extent/duration) has been collected in appropriate locations to characterise the noise and air quality environments to undertake the assessments.</p> <p>This was agreed via PEIR feedback in December 2017.</p>	Agreed	<b>Agreed</b>
Assessment methodology	<p>The impact assessment methodologies used for the assessment represent an appropriate approach to assessing potential impacts.</p> <p>This was agreed via PEIR feedback in December 2017.</p>	Agreed	<b>Agreed</b>
	<p>The worst-case scenario presented in the assessment is appropriate.</p> <p>This was agreed via PEIR feedback in December 2017.</p>	Agreed	<b>Agreed</b>
	<p>The assessments adequately characterise the baseline environment in terms of noise, vibration and air quality.</p> <p>This was agreed via PEIR feedback in December 2017.</p>	Agreed	<b>Agreed</b>
Assessment findings	<p>The assessment of impacts for construction, operation and decommissioning presented is appropriate and, assuming the inclusion of the mitigation described, impacts from noise, vibration and air quality are non-significant in EIA terms.</p> <p>This was agreed via PEIR feedback in December 2017.</p>	<p>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>	<b>Agreed</b>

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
	<p>The assessment of cumulative effects is appropriate and, assuming the inclusion of the mitigation described, cumulative impacts from noise, vibration and air quality are non-significant in EIA terms. This was agreed via PEIR feedback in December 2017.</p>	<p>Agreed</p>	<p><b>Agreed</b></p>

<p>Approach to mitigation</p>	<p>The consented working hours are 7am to 7pm Monday to Friday, and 7am to 1pm on Saturdays. Outside of these hours mobilisation areas will effectively be locked. To prevent HGVs arriving at a locked compound (outside of the consented hours) control of HGV deliveries is set out at Section 1.6.3 of the outline Traffic Management Plan (TMP) (document reference 8.8). Control measures include:</p> <ul style="list-style-type: none"> <li>• HGV booking system - the booking system will enable a daily profile of deliveries to be maintained and allow the contractor to ensure that the required deliveries are regularly forecast and planned. Suppliers will be informed of the working hours and their booking slot and their supplier contracts will be based on adhering to these conditions.</li> <li>• Suppliers will be warned that HGVs will be refused access and turned away if they arrive outside of their allocated time slot. This is proposed as a deterrent to ensure suppliers adhere to this control mechanism.</li> <li>• A small number of daily slots will be reserved to accommodate any unplanned deliveries.</li> <li>• The contractor will be required to keep an up to date record of deliveries and exports from the project, this will take the form of delivery receipts. This information will be retained to be provided to the relevant local</li> </ul>	<p>The Applicant has indicated that any HGVs arriving prior to 7am would not be permitted onto site. This would mean that they would be turned away, potentially making the noise impact worse. In order to avoid this, the Applicant should identify remote waiting areas for HGVs so that they do not arrive before 7am, and so that they do not congregate in the local area before 7am near sensitive receptors.</p> <p>Further discussion is required to clarify the applicant's approach.</p>	<p><b>Under discussion</b></p>
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Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
	<p>authority, NCC and Highways England upon request.</p> <ul style="list-style-type: none"> <li>Supply chain vehicles will display a unique identifier in the cab of the vehicle.</li> <li>Should there be any occasion where a supplier does not adhere to the prescribed controls enforcement measures will be taken.</li> </ul>		
	<p>In relation to Requirement 26(2)(h), daily start up or shut down is outside of the specified construction hours, this was intended to allow activities in connection with good practice site management and safety measures. It would include, for example, personnel arriving to site in advance of shift start time, undertaking daily site health and safety inspections and the provision of tool box talks. This will ensure that the site is open and ready to accept deliveries promptly from 7am. Such activities would only be permitted to the extent that they were considered 'non-intrusive'.</p>	<p>NNDC remains concerned that daily start up and shut down is outside the permitted hours, as is the mobilisation period.</p> <p>Further discussion is required to clarify the applicant's approach.</p>	<p><b>Under discussion</b></p>

	<p>Section 1.7.3. of the outline TMP (document reference 8.8) identifies that Little London Road (link 69) will have construction traffic capped at a maximum of 48 HGV movements per day. Paragraph 88 of the OTMP states <i>Specific to link 69, Little London Road, the proposed HGV cap must be achieved using smaller payload vehicles (~10tonne) to traverse the constrained highway corridor.</i></p> <p>In addition, community engagement is key to ensuring the severance impacts are managed on Little London Road and this is reinforced in Section 1.9.2 of the outline TMP which sets out the strategy for Local Community Liaison as follows: <i>Norfolk Vanguard Limited will ensure effective and open communication with local residents and businesses that may be affected by noise or other amenity aspects caused by the construction works. Communications will be co-ordinated on site by a designated member of the construction management team. A proactive public relations campaign will be maintained, keeping local residents informed of the type and timing of works involved, the transport routes associated</i></p> <p>It should be noted that cumulative impact assessment work is currently being undertaken to take into account updated information associated with Hornsea Project 3 construction traffic. The Applicant is happy to share the outputs of the</p>	<p>The area of Little London, whilst NNDC welcomes the Applicant’s proposed reduction in numbers of vehicles for this area and types of vehicles, NNDC would appreciate further discussion with the Applicant to minimise the potential for adverse impacts, particularly given that this is such a sensitive area with dwellings close to the construction access.</p> <p>NNDC requests that the Applicant share any cumulative impact assessment (related to the Hornsea Project 3) with NNDC as soon as possible.</p>	
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Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
	<p>exercise with NNDC, but it should be noted that there are no road links in the North Norfolk District that will be shared by both projects.</p>		
	<p>As part of the communication liaison process set out in the outline CoCP (section 2.4) a complaints procedure will be established. Any complaints will be logged, investigated and, where appropriate, rectifying action will be taken. The details of the complaints procedure, including the mechanism for informing NNDC when complaints are received and to enable NNDC to make the contractor aware of complaints coming directly to the local authority will be agreed through the production of the final CoCP produced post-consent. The final CoCP would be submitted to, and approved by, the relevant planning authority prior to any works commencing for that stage. For works in North Norfolk District the relevant planning authority will be North Norfolk District Council.</p>	<p>A mechanism needs to be in place for the relevant local authority to be made aware of complaints and also for the relevant local authority to make the contractor aware of any complaints that come direct to the local authority.</p>	<p><b>Under discussion</b></p>

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
	<p>The production of a Code of Construction Practice (CoCP), including a Construction Noise and Vibration Management Plan and Operational Noise Management Plan (based on the OCoCP, document reference 8.1) will provide sufficient mitigation for potential impacts on noise, vibration and air quality. This was agreed via PEIR feedback in December 2017.</p>	<p>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>	<p><b>Under Discussion.</b></p>
<p>Wording of Requirement(s)</p>	<p>The wording of Requirement 20 provided within the draft DCO (and supporting certified documents) for the mitigation of impacts associated with noise and vibration and air quality are considered appropriate and adequate. Requirement 20(2)(e) will be amended to read “construction noise and vibration”.</p>	<p>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. Requirement 20 - “vibration” should be added to the list in requirement 20(2).</p>	<p><b>Under Discussion</b></p>

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
	<p>In relation to Requirement 26(2)(h), daily start up or shut down is outside of the specified construction hours and is intended to allow activities in connection with good practice site management and safety measures. It would include, for example, personnel arriving to site in advance of shift start time, undertaking daily site health and safety inspections and the provision of tool box talks. This will ensure that the site is open and ready to accept deliveries promptly from 7am. Such activities would only be permitted to the extent that they were considered 'non-intrusive'.</p> <p>The mobilisation period associated with any of the onshore construction works would be subject to the normal consented construction hours.</p>	<p>NNDC remains concerned that 'daily start up and shut down' is outside the permitted hours, as is the 'mobilisation period'. Further explication and definition of these broad terms would be welcomed to ensure that noisy activity is excluded.</p>	<p><b>Under Discussion</b></p>



## 2.9 Onshore Archaeology and Cultural Heritage

42. The project has the potential to impact upon onshore archaeology and cultural heritage. Chapter 28 of the ES (document reference 6.1 of the Application) provides an assessment of the significance of these impacts.
43. Table 16 provides an overview of meetings and correspondence undertaken with North Norfolk District Council regarding onshore archaeology and cultural heritage.
44. Table 17 provides areas of agreement and disagreement regarding onshore archaeology and cultural heritage.
45. Further details on the Evidence Plan for onshore archaeology and cultural heritage can be found in Appendix 9.22 and Appendix 25.4 of the Consultation Report (document reference 5.1 of the Application).

**Table 16 Summary of Consultation with North Norfolk District Council regarding onshore archaeology and cultural heritage**

Date	Contact Type	Topic
<b>Pre-Application</b>		
25 <sup>th</sup> April 2017	Email	Circulation of viewpoint locations for the LVIA and Cultural Heritage Assessment.
2 <sup>nd</sup> May 2017	Meeting	Discussion of coastal, intertidal and nearshore archaeological considerations at Happisburgh South.
10 <sup>th</sup> May 2017	Email	NNDC agrees with suggested landscape viewpoints and additional viewpoint requested.
19 <sup>th</sup> July 2017	Meeting	Onshore Archaeology and Cultural Heritage Pre-PEI ETG Meeting: Project update and overview of results to date.
8 <sup>th</sup> December 2017	Letter	PEIR response
24 <sup>th</sup> January 2018	Meeting	Onshore Archaeology and Cultural Heritage ETG meeting - PEIR comments and approach to updating assessments.
4 <sup>th</sup> April 2018	Email	Request for confirmation of projects to be included in the CIA.
<b>Post-Application</b>		
16 <sup>th</sup> September	Relevant Representation	Initial feedback from NNDC on the DCO application

Date	Contact Type	Topic
19 <sup>th</sup> September	Email from the Applicant	Draft SoCG provided for review
14 <sup>th</sup> December	Email from NNDC	Comments on the SoCG

**Table 17 Statement of Common Ground - onshore archaeology and cultural heritage**

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
Existing Environment	Sufficient survey data (extent/duration) has been collected to inform the assessment.	<p>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>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>In respect of archaeology, NNDC would defer to the advice of Norfolk County Council Historic Environment Service who provide</p>	<b>Agreed in relation to cultural heritage matters</b>
	It is accepted that outstanding geophysical surveys (scheme-wide) may be undertaken post-consent.		
	The approach to the selection of priority geophysical survey areas was appropriate and sufficient to inform the assessment of impacts.		
	Heritage setting viewpoint locations are representative and appropriate.		
	Archaeological trial trenching is not required to inform the assessment of impacts pre-application. Further evaluation will be completed post-consent.		
Assessment methodology	The impact assessment methodologies used for the assessment (DMRB Volume 11, Section 3, Part 2: Cultural Heritage) provide an appropriate approach to assessing potential impacts of the project.		
	The worst-case scenario presented in the assessment is appropriate.		
	The assessment adequately characterises the baseline environment in terms of onshore archaeology and cultural heritage, including the setting of designated heritage assets.		

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position		
	The scope of the Archaeological Desk Based Assessment (ADBA) is appropriate to inform the assessment.	advice to North Norfolk District Council in relation to all matters of archaeological heritage.			
Assessment findings	The assessment of impacts for construction, operation and decommissioning presented is appropriate and, assuming the inclusion of the mitigation described and commitment to further evaluation post-consent, impacts on onshore archaeology and cultural heritage are likely to be non-significant in EIA terms.				
	The assessment of cumulative effects is appropriate and, assuming the inclusion of the mitigation described, cumulative impacts on onshore archaeology and cultural heritage are likely to be non-significant in EIA terms.				
Approach to mitigation	The provision of a pre-construction and construction Archaeological Written Scheme of Investigation (WSI) (Onshore) (to be based on the outline WSI, document reference 8.5) is considered suitable, with respect to Set-Piece Excavation (SPE); Strip, Map and Sample and archaeological monitoring/watching brief scenarios.				
	The mitigation proposed for potential impacts on buried and above-ground archaeological remains is appropriate.				

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
Wording of Requirement(s)	The wording of Requirement 23 provided within the draft DCO (and supporting certified documents) for the mitigation of impacts to onshore archaeology and cultural heritage are considered appropriate and adequate.	In respect of requirement 23, 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.	<b>N/A</b>

## 2.10 Landscape and Visual Impact Assessment

46. The project has the potential to impact upon landscape and visual receptors. Chapter 29 of the ES (document reference 6.1 of the Application) provides an assessment of the significance of these impacts.
47. Table 18 provides an overview of meetings and correspondence undertaken with North Norfolk District Council regarding the landscape and visual impact assessment (LVIA).
48. Table 19 provides areas of agreement and disagreement regarding the LVIA.
49. Further details on the Evidence Plan for LVIA can be found in Appendix 9.18 and Appendix 25.3 of the Consultation Report (document reference 5.1 of the Application).

**Table 18 Summary of Consultation with North Norfolk District Council regarding LVIA**

Date	Contact Type	Topic
<b>Pre-Application</b>		
6 <sup>th</sup> March 2017	Meeting	Introduction to Evidence Plan Process and the project.
25 <sup>th</sup> April 2017	Email	Circulation of viewpoint locations for the LVIA and Cultural Heritage Assessment.
10 <sup>th</sup> May 2017	Email	NNDC agrees with suggested landscape viewpoints and additional viewpoint requested.
19 <sup>th</sup> July 2017	Meeting	Landscape and Visual Impacts Pre-PEI ETG Meeting: Project update and overview of results to date.
8 <sup>th</sup> December 2017	Letter	PEIR response.
24 <sup>th</sup> January 2018	Meeting	LVIA ETG meeting - PEIR comments and approach to updating assessments.
4 <sup>th</sup> April 2018	Email	Request for confirmation of projects to be included in the CIA.
<b>Post-Application</b>		
16 <sup>th</sup> September	Relevant Representation	Initial feedback from NNDC on the DCO application
19 <sup>th</sup> September	Email from the Applicant	Draft SoCG provided for review
14 <sup>th</sup> December	Email from NNDC	Comments on the SoCG

Date	Contact Type	Topic
16th January 2019	Local Impact Report	Outlining NNDC's position on the application.
14th February 2019	Post hearing submission	Deadline 3 submission responding to points raised during the issue specific hearings

**Table 19 Statement of Common Ground - LVIA**

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
Existing Environment	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>NNDC considers that Vattenfall have given appropriate regard to relevant national policy. However, in respect of relevant Local Policy and material planning considerations, in 2018 North Norfolk District Council commissioned two new studies:</p> <p>a) revised Landscape Character Assessment; and</p> <p>b) a new Landscape Sensitivity Assessment (with particularly reference to renewable energy and low carbon development).</p> <p>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 SPD in Spring/Summer 2019.</p>	<b>Under Discussion</b>
	The methodology and viewpoints selected are representative and appropriate.	Agreed	<b>Agreed</b>



Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
Assessment methodology	The list of potential LVIA effects assessed, as proposed in the Evidence Plan method statement provided in October 2016 and PEIR feedback in December 2017, is appropriate.	Agreed	<b>Agreed</b>
	The impact assessment methodologies, including for cumulative effects, used are those agreed and remain appropriate for assessing potential impacts.	Agree	<b>Agreed</b>
	Visual impacts associated with the landfall and cable installation are limited to the construction phase and an assessment of operational impacts was not required.  Landscape and visual impacts that occur during construction, such as the recovery of hedgerows and trees following removal, are assessed in full for the construction phase rather than operation.	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	<b>Under Discussion</b>
	The worst-case scenario presented in the assessment is appropriate. The worst case scenario is based on HVDC technology with no requirement for a cable relay station. The DCO based on the submitted application would not permit the construction and operation of a cable relay station.	Agree – subject to the scheme not subsequently being amended to HVAC (with associated onshore cable relay station).	<b>Under Discussion</b>

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
Assessment findings	The assessment adequately characterises the visual baseline.	Agreed	<b>Agreed</b>
	The assessment of effects for construction, operation and decommissioning presented is appropriate and adheres to the agreed methodology.	Agreed	<b>Agreed</b>
	The photovisualisations are a fair reflection of the potential visibility of the above ground infrastructure from the agreed receptors.	N/A	<b>N/A</b>
	The assessment of cumulative effects is appropriate and, assuming the inclusion of the mitigation described, cumulative effects would be mitigated over time.	Agreed	<b>Agreed</b>
Approach to mitigation	<p>The mitigation proposed for LVIA are considered appropriate and adequate.</p> <p>The replacement planting within North Norfolk District is related to replacement hedgerows only. Hedgerow planting will typically mature within 3-5 years. On this basis, the Applicant feels that a commitment to 5 years aftercare is appropriate.</p>	<p>Notwithstanding the details set out in the OLEMS, NNDC would wish to influence the species choice with regard to landscape mitigation planting and therefore welcomes Requirement 18.</p> <p>In respect of landscaping schemes, it is standard practice within North Norfolk District Council to impose a ten-year replacement planting period condition (rather than the proposed five-year period) on major developments where landscape planting is an important element of the proposal.</p>	<b>Under Discussion</b>

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
	<p>All mitigation measures required are outlined in sufficient detail within the Outline Landscape and Environmental Management Strategy (OLEMS).</p>	<p>NNDC have evidenced why a ten year rather than a five-year replacement planting period should be applied to the Norfolk Vanguard DCO under requirement 19 (2). The further evidence to support this request was submitted by NNDC to the examination at Deadline 3. Similar evidence was presented to the ExA for Ørsted Hornsea Project Three and, in the Examining Authority’s schedule of changes to the draft Development Consent Order for HP3 (issued 26 Feb 2019), the ExA in that DCO have now indicated that they are minded to agree to a ten-year replacement planting period. Accordingly, the ExA are invited to take a similar approach with Norfolk Vanguard.</p> <p>NNDC are disappointed that the applicant considers no replacement trees are to be provided within the NNDC authority area. In respect of replacement planting, it is the expectation of NNDC that where trees are to be removed along the cable route (for example, where removal cannot reasonably be avoided), these should be replaced within reasonable proximity as part of the Provision of Landscaping (DCO Requirement 18) and appropriately managed as part of the Implementation and Maintenance of Landscaping (DCO Requirement 19) for a period of ten years after planting.</p>	

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
Wording of Requirement(s)	<p>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 NNDC. The submitted landscape management scheme will provide details of species composition, the process for replacing failed planting and role and responsibilities for managing and maintaining the planting.</p> <p>A five-year replacement / maintenance period has been proposed as this is a standard timeframe for the type of planting proposed in North Norfolk District, i.e. hedgerows. 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>Requirement 18(2)(d) will be amended to read “details of existing</p>	<p>Whilst NNDC generally welcome the contents of 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>NNDC would also welcome further clarification as to who will manage and maintain landscape mitigation planting. Requirement 19(2) should be amended to a 10-year period and include the discretion “unless otherwise approved in writing by the local planning authority”.</p> <p>Hedgerows should be included in Requirement 18(2)(d).</p>	<b>Under Discussion</b>

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
	<p>trees and hedgerows to be retained with measures for their protection during the construction period”.</p> <p>On this basis, the wording of Requirements 18 and 19 and provided within the draft DCO (and supporting certified documents) for the mitigation of impacts in the LVIA are considered appropriate and adequate.</p>		

## 2.11 Tourism, recreation and socio-economics

50. The project has the potential to impact upon tourism, recreation and socio-economics. Chapter 30 and 31 of the ES, (document reference 6.1.30 and 6.1.31 of the Application), provides an assessment of the significance of these impacts.
51. Table 20 provides an overview of meetings and correspondence undertaken with North Norfolk District Council regarding tourism, recreation and socio-economics.
52. Table 21 provides areas of agreement and disagreement regarding tourism, recreation and socio-economics.
53. Further details on the Evidence Plan for tourism, recreation and socio-economics can be found in Appendix 9.21 of the Consultation Report (document reference 5.1 of the Application).

**Table 20 Summary of Consultation with North Norfolk District Council regarding tourism, recreation and socio-economics**

Date	Contact Type	Topic
<b>Pre-Application</b>		
14 <sup>th</sup> March 2016	Meeting	Introduction to Norfolk Vanguard; economic benefit and UK content; useful contacts; NSIP process; potential issues.
14 <sup>th</sup> January 2017	Email	Provision of the Land Use, Socio-Economics and Tourism, and Health Impact Assessment Method Statements
8 <sup>th</sup> December 2017	Letter	PEIR response
4 <sup>th</sup> April 2018	Email	Request for confirmation of projects to be included in the CIA.
<b>Post-Application</b>		
16 <sup>th</sup> September	Relevant Representation	Initial feedback from NNDC on the DCO application
19 <sup>th</sup> September	Email from the Applicant	Draft SoCG provided for review
14 <sup>th</sup> December	Email from NNDC	Comments on the SoCG
16 <sup>th</sup> January 2019	Local Impact Report	Outlining NNDC's position on the application.
14 <sup>th</sup> February 2019	Post hearing submission	Deadline 3 submission responding to points raised during the issue specific hearings

**Table 21 Statement of Common Ground - tourism, recreation and socio-economics**

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
Existing Environment	<p>Appropriate datasets have been presented to inform the assessments.</p> <p>The datasets include a report produced by Destination Research in 2016 that considers the economic impact of tourism across all of Norfolk broken down to the district level. This data has informed the baseline environment.</p>	<p>In respect of data sources set out at Table 30.11, NNDC note that the applicant has used 2016 data rather than 2017 data from the NNDC commissioned annual study of the Economic Impact of Tourism which is available to view on the Council’s website for the year 2017. 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>NNDC note that the applicant has indicated there is no significant change in the trends between 2016 and 2017. If this is the case then NNDC question why the 2017 (most up to date available data) cannot be used.</p>	<b>Under Discussion</b>
Assessment methodology	The impact assessment methodologies used provide an appropriate approach to assessing potential impacts of the project.	Agreed	Agreed
	The worst-case scenario presented in the assessments is appropriate.	Agree	Agreed

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
	<p>The assessment adequately characterises the baseline environment in terms of tourism, recreation and socio-economics.</p> <p>Within Chapter 30 Tourism and Recreation the Norfolk Coast AONB is identified tourism features of national importance, and footpaths, cycles routes and coastal resorts are identified as tourism features of regional importance.</p>	<p>See above regarding Economic Impact of Tourism.</p> <p>NNDC would challenge the assumption set out at Chapter 30 (para 214) that <i>'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'</i>.</p> <p>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>NNDC note the updated position of the applicant which confirmed that footpaths, cycles routes and coastal resorts are identified as tourism features of regional importance</p>	<b>Agreed</b>
Assessment findings	<p>The assessment of effects for construction, operation and decommissioning presented is appropriate and, assuming the inclusion of the mitigation described, impacts on tourism, recreation and socio-economics are likely to be non-significant in EIA terms.</p> <p>In order to minimise impacts and disruption, the onshore duct installation process will be undertaken in a sectionalised</p>	<p>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. 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</p>	<b>Under Discussion</b>



Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
	<p>approach. Workfronts will operate from mobilisation areas distributed along the cable route. Each workfront will work on a short length (approximately 150m) to excavate, install ducts, backfill and reinstate. Works on each 150m section from topsoil strip to reinstatement would take approximately 2 weeks.</p>	<p>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 slightly greater recognition by Vattenfall.</p> <p>NNDC note the updated position of the applicant which confirmed that works on each 150m section from topsoil strip to reinstatement would take approximately 2 weeks. However, this does not take account of the position of mobilisation area compounds and the landfall location which will result in disturbance impacts over a much longer duration. Whilst these will no doubt be appropriately managed through the CoCP and TMP, this cannot entirely remove the likelihood of lost tourism trips and local tourism spend attributed to the impact of onshore construction works taking place, which may also affect repeat bookings and spend. The applicant does not appear to recognise this potential impact on small tourism businesses nor has an appropriate mitigation strategy been proposed. Whilst the impact on local tourism may not be considered 'significant' at a regional level, at a local level the impacts have the potential to be lasting and, in some cases could be permanent if businesses are forced to close due to loss of trade attributable to the impact of construction activities affecting tourism draw.</p>	

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
	The assessment of cumulative effects is appropriate and, assuming the inclusion of the mitigation described, cumulative impacts on tourism, recreation and socio-economics are likely to be non-significant in EIA terms.	Agreed – some potential for wider impacts if Vanguard and Boreas are delivered concurrently but impacts would be relatively short-term.	<b>Agreed</b>

<p>Approach to mitigation</p>	<p>Embedded mitigation related to tourism, recreation and socio-economics are detailed within ES Chapter 30 Tourism and Recreation and ES Chapter 31 Socio-economics, which include:</p> <ul style="list-style-type: none"> <li>• Commitment to HVDC technology;</li> <li>• Onshore cable duct installation strategy is proposed to be conducted in a sectionalised approach in order to minimise impacts;</li> <li>• Long HDD at the landfall (avoiding interaction with the beach and the coastal path); and</li> <li>• Commitment to not use the Happisburgh beach car park;</li> </ul> <p>Mitigation associated with potential noise and vibration, air quality, and general disturbance impacts are captured within the outline CoCP (DCO doc: 8.1).</p> <p>Mitigation measures associated with potential construction traffic impacts are detailed with the outline Traffic Management Plan (DCO doc: 8.8).</p>	<p>NNDC notes the position of the applicant in respect of embedded mitigation. Whilst many issues will no doubt be appropriately managed through the CoCP and TMP, this cannot entirely remove the likelihood of lost tourism trips and local tourism spend attributed to the impact of onshore construction works taking place, which may also affect repeat bookings and spend. The applicant does not appear to recognise this potential impact on small tourism businesses nor has an appropriate mitigation strategy been proposed.</p> <p>Whilst the impact on local tourism may not be considered 'significant' at a regional level, at a local level the impacts have the potential to be lasting and, in some cases could be permanent if businesses are forced to close due to loss of trade attributable to the impact of construction activities affecting tourism draw, no matter how well managed or controlled. The applicant needs to go further to identify mitigation to help tourism (and related) businesses adversely affected by construction activities including how smaller businesses can be compensated so as to avoid their permanent loss/closure.</p> <p>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 address</p>	<p><b>Under Discussion</b></p>
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	<p>Mitigation measures associated with potential landscape &amp; visual and ecological impacts are detailed within the OLEMS (DCO doc 8.7).</p> <p>Mitigation measures associated with the temporary disturbance to users of Public Rights of Way (PROW) are set out in the PROW Strategy (DCO document 8.4).</p> <p>With these measures fully implemented no significant impacts have been identified associated with tourism &amp; recreation and socio-economic receptors.</p> <p>A Construction Liaison Committee will be established in advance of construction and the appointment of a Community Liaison Officer. This will ensure effective and open communication with local residents and businesses that may be affected by the construction works. This is secured within the outline CoCP and through Requirement 20.</p> <p>In addition, Norfolk Vanguard Ltd. is committed to exploring options for delivering a provision for communities, with the aim of</p>	<p>the likely adverse impacts on the tourism sector within North Norfolk.</p> <p>NNDC would wish to open a positive dialogue with Vattenfall to ensure that appropriate community and wider district benefits can be derived on the back of this significant infrastructure investment.</p>	
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Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
	<p>recognising hosts and accounting for change, where benefits acknowledge and address tangible local change. The form of the benefit and its purpose will be explored with relevant stakeholders at the appropriate time, separate to the DCO process.</p>		

Topic	Norfolk Vanguard Limited position	North Norfolk District Council position	Final position
Wording of Requirement(s)	<p>The wording of the Requirements provided within the draft DCO (and supporting certified documents) for the mitigation of impacts to tourism, recreation and socio-economics are considered appropriate and adequate.</p>	<p>The applicant does not appear to recognise this potential impact on small tourism businesses nor has an appropriate mitigation strategy been proposed.</p> <p>Whilst the impact on local tourism may not be considered 'significant' at a regional level, at a local level the impacts have the potential to be lasting and, in some cases could be permanent if businesses are forced to close due to loss of trade attributable to the impact of construction activities affecting tourism draw, no matter how well managed or controlled. The applicant needs to go further to identify mitigation to help tourism (and related) businesses adversely affected by construction activities including how smaller businesses can be compensated so as to avoid their permanent loss/closure.</p> <p>NNDC would welcome further discussion on this point.</p>	<p><b>Not Agreed</b></p>

**The undersigned agree to the provisions within this SOCG**

Signed	GJ Lyon
Printed Name	Geoff Lyon (MTCP, MRTPI)
Position	Major Projects Manager
On behalf of	North Norfolk District Council
Date	12 March 2019

Signed	R Sherwood
Printed Name	Rebecca Sherwood
Position	Norfolk Vanguard Consents Manager
On behalf of	Norfolk Vanguard Ltd (the Applicant)
Date	12 March 2019