

Norfolk Vanguard Offshore Wind Farm Applicant's Comments on Deadline 3 Submissions

Applicant: Norfolk Vanguard Limited
Document Reference: ExA; Comments; 10.D4.7
Deadline 4

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Photo: Kentish Flats Offshore Wind Farm



Date	Issue No.	Remarks / Reason for Issue	Author	Checked	Approved
11/03/2019	01D	First draft for Norfolk Vanguard Ltd review	JA	GK	RS
12/03/2019	01F	Final version for submission at Deadline 3	JA	GK	RS

Glossary

ASI	Accompanied Site Inspection
CoCP	Code of Construction Practice
DCO	Development Consent Order
ERPC	East Ruston Parish Council
ES	Environmental Statement
HVDC	High Voltage Direct Current
OTMP	Outline Traffic Management Plan

1 INTRODUCTION

1. This document contains the Applicant's responses to submissions by Interested Parties at Deadline 3 of the Norfolk Vanguard Examination.
2. The Applicant has reviewed all submissions at Deadline 3, however it is noted that the majority of these submissions are addressed either through updated Statements of Common Ground as submitted at Deadline 4, or they relate to issues which the Applicant feels they have already addressed through previous submissions and/or through the Applicant's oral case at relevant Issue Specific Hearings.
3. The responses below therefore focus only on those issues which have not previously been addressed or are not covered through other submissions.

2 APPLICANT'S COMMENTS ON ADDITIONAL SUBMISSIONS

Written Representation	Applicant's Response
<p>Helen and Chris Monk</p> <p>Request inclusion of Cawston in the ASI and concerns of traffic through Cawston (and associated vibration) and query whether a Traffic Management Plan has been produced for Norfolk Vanguard.</p>	<p>An outline Traffic Management Plan (OTMP) was submitted as part of the Norfolk Vanguard DCO application (document reference 8.8).</p> <p>Hornsea Project Three has recently submitted updated construction traffic numbers to their examination, which has enabled the Applicant to progress the cumulative impact assessment work through Cawston. This is due to be submitted to the Norfolk Vanguard examination at Deadline 5. An updated noise and vibration impact assessment of the cumulative traffic will form part of this Deadline 5 submission. The Applicant is aware that Hornsea Project Three has also recently undertaken vibration monitoring along Cawston High Street, which has not yet been submitted to their examination. The Applicant is engaging with Hornsea Project Three and hopes to have an opportunity to review the outputs from this additional vibration monitoring to inform the cumulative impact assessment that will be submitted at Deadline 5.</p> <p>Should the cumulative noise and vibration impact assessment identify a requirement for additional mitigation measures along Cawston High Street, these would be captured in updated plans as appropriate – either an update to the outline Traffic Management Plan or an update to the outline Code of Construction Practice, depending on the nature of the any measures (if any) that are identified.</p>
<p>Breckland Council</p> <p>Written response requested by the Planning Inspector regarding a point raised by the Environment Agency in regards to the plane crash near Necton in 1996.</p>	<p>Breckland Council confirm that the site is currently at low risk based on the known history and description of the site clean up, and that the Applicant would need to undertake appropriate contaminated land investigations post-consent.</p> <p>The Applicant welcomes these comments from Breckland Council, and confirms that this aligns with the approach that the Applicant has committed to through the provision of a written scheme for contaminated land and groundwater, which is captured in the Code of Construction Practice and secured through Requirement 20.</p>
<p>Penelope Malby & Sue Allen</p> <p>Additional information from Happisburgh REACT regarding holiday businesses and the effects of 24 hour traffic and lighting at the landfall</p>	<p>The items raised within this submission relate to construction traffic and lighting at the landfall in the event of 24 hour working.</p> <p>The Applicant submitted the following clarification note to the examination on 19th February 2019 <i>Landfall 24 Hour Vehicle Requirements</i> (document reference ExA;AS_ISH1 Action;10.D3.7) which sets out</p>

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	<p>construction traffic generation at the landfall in the event of 24 hour working.</p> <p>Construction lighting at the landfall, with specific reference to this submission, have been responded to within the Applicant's response to the ExA's second written questions (Q10.3) submitted at Deadline 4.</p>
<p>Colin King</p> <p>Submission regarding the ongoing maintenance of the substation surface water drainage system when the project is decommissioned and concerns over acquisition of land rights.</p>	<p>The approach to decommissioning of the onshore project substation is described in section 5.5.5.8 of Environmental Statement Chapter 5 Project Description. Whilst a final decommissioning plan has not yet been prepared it is expected that the onshore project substation decommissioning would include the removal of all infrastructure and services associated with the construction of the substation. This would include the installed surface water drainage system. On this basis, there would be no requirement for ongoing maintenance once the project has been decommissioned.</p> <p>Further to the Applicant's response to Colin King's written representation at Deadline 2 in the Applicant's comments on Written Representations (ExA; WRR: 10.D2.2), the Applicant has been in further communication with Mr King in relation to the rights. The Applicant's position remains that negotiations are ongoing with the freeholder of the land in the first instance.</p>
<p>East Ruston Parish Council</p> <p>Written Representation welcoming the decision to use HVDC and highlighting that consideration needs to be given to the following:</p> <ul style="list-style-type: none"> • ERPC to be kept informed of road closures / diversions in their area; • How businesses affected by increased traffic would be compensated; and • Damage to road surfaces should be rectified. 	<p>An OTMP was submitted as part of the Norfolk Vanguard DCO application (document reference 8.8). The OTMP captures the mitigation measures identified to manage potential traffic impacts associated with the construction of Norfolk Vanguard. The commitments set out in the OTMP are secured through Requirement 21 of the draft DCO.</p> <p>Section 1.9.2 of the OTMP sets out the procedures for communicating with affected local residents and businesses, which states that "<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 with the works, the hours of likely construction traffic movements and key traffic management measures that would be provided. A combination of communication mechanisms such as posters and parish meetings will be employed to keep local residents informed</i>"</p>

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	<p>Section 1.8 of the OTMP deals with the management of the existing highway and states that <i>“Any damage to the existing road network or public highway as a consequence of the construction activities, will be made good to the reasonable satisfaction of Norfolk County Council as Local Highway Authority”</i>.</p> <p>With respect to compensation and in relation to Part 1 of the Land Compensation Act 1973, claims can only be made in respect of certain physical factors (noise, light, smell, fumes, smoke, dust, fluids discharge) arising from the operation of the project, with the date of claim being 1 year after the project becomes operational. The effects of noise, lighting and dust were assessed in full as part of the EIA (ES Chapters 25 Noise and Vibration, 26 Air Quality, and 29 Landscape and Visual Impact Assessment). No operational impacts were identified as part of those assessments. As it is the Applicant's position that there will be no operational impact arising from the physical factors listed to any businesses, it will not be possible to make a claim under Part 1 of the Land Compensation Act 1973.</p>
<p>Natural England Comments on Development Consent Order schedule of changes submitted by the Applicant at Deadline 2 [REP2-019]</p>	<p>The Applicant is considering the outstanding points raised by Natural England and, as far as possible, these are being addressed in discussions with Natural England and/or through the revised draft of the DCO (submitted at Deadline 4).</p>
<p>Natural England Comments on Explanatory Memorandum submitted by the Applicant at Deadline 2 [REP2-020 and REP2-021]</p>	<p>The Applicant is considering the outstanding points raised by Natural England and, as far as possible, these are being addressed in discussions with Natural England and/or through the revised draft of the DCO (submitted at Deadline 4).</p>
<p>Natural England Comments on Draft Development Consent Order submitted by the Applicant at Deadline 2 [REP2-017 and REP2-018]</p>	<p>The Applicant is considering the outstanding points raised by Natural England and, as far as possible, these are being addressed in discussions with Natural England and/or through the revised draft of the DCO (submitted at Deadline 4).</p>