

Norfolk Vanguard Offshore Wind Farm Applicant's Comments on Deadline 5 Written Submissions

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



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Glossary

DCO	Development Consent Order
dDCO	Draft Development Consent Order
ES	Environmental Statement
GLVIA	Guidelines for Landscape and Visual Impact Assessment Third Edition
ISH	Issue Specific Hearing
NSAG	Necton Substation Action Group
OCoCP	Outline Code of Construction Practice
OTMP	Outline Traffic Management Plan
SACTN	Substations Access Clarifications Technical Note
SoCG	Statement of Common Ground
SPA	Special Protection Area

1 INTRODUCTION

1. This document contains the Applicant's responses to submissions by Interested Parties at Deadline 5 of the Norfolk Vanguard Examination.

2 APPLICANT'S COMMENTS ON ADDITIONAL SUBMISSIONS

2.1 Necton Substation Action Group (NSAG)

Written submission	Applicant's Response
<p>Email correspondence between NSAG and the Environment Agency to determine what the acronym IPC denotes.</p> <p>NSAG also flag up that a single report produced in relation to the F16 plane crash was not released by the Danish Air Force.</p>	<p>No further comment from the Applicant.</p>
<p>Published 21st March</p> <p>Dear Planning Inspectorate,</p> <p>We contacted Vattenfall asking why they were quoting a point from the Scottish Guidelines for offshore wind community benefits, which are irrelevant as they were devised for use in another country, instead of these English Guidelines¹ which while ostensibly being for onshore wind, are at least for England, and cover community benefits for onshore infrastructure, which of course their Vanguard project entails vis a vis landfall, cable corridors and substations.</p>	<p>As stated in the Applicant's comments to additional submissions at Deadline 4 (ExA; Comments; 10.D5.3), there are no UK Government guidelines with respect to Community Benefits and offshore wind farms. It is true that as with any power generating infrastructure whether onshore wind, gas fired power stations, or any other relevant infrastructure, an offshore wind farm requires some onshore electrical infrastructure to enable the transmission of energy into the national grid. However, the English guidance is in relation to the power generating equipment rather than ancillary equipment.</p>

2.2 Tony Smedley

Written submission	Applicant's Response
<p>Querying the omission of Ivy Todd Farm from the sites proposed for the accompanied site inspection, and that there is no photomontage for either Ivy Todd Farm or Wood Farm. Also the developer is being disingenuous in their other choices, such as 'Location 8' (St. Andrews Lane) which it seems have been carefully chosen, laying behind a natural rise in the ground.</p>	<p>Ivy Todd Farm was not identified as a location for a site visit because there would be no visibility of the Norfolk Vanguard onshore project substation from the farmhouse. This is a result of the combination of the enclosure of landform and tree-cover, as well as the screening effect of the farm buildings which screen views to the north where the Norfolk Vanguard and Norfolk Boreas onshore project substations would be located. Whilst there would be visibility of the Norfolk Vanguard and Norfolk Boreas onshore project substations from the farm land further to the north and north-east, there are no principal visual receptors in this area, for example settlements, public roads or public footpaths, which a viewpoint could be used to represent. Similarly, visibility of the Norfolk Vanguard and Norfolk Boreas onshore project</p>

¹

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/363405/FINAL - Community Benefits Guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/363405/FINAL_-_Community_Benefits_Guidance.pdf)

Written submission	Applicant's Response
	<p>substations from Wood Farm farmhouse would be unlikely owing to the extent of intervening tree cover and woodland blocks. Furthermore, the orientation of the house is east-south-east and west-north-west, while the substations would be located to the south-west, such that there would be no direct views from the principal rooms, even if intervening vegetation were to be removed.</p> <p>In Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA 3) viewpoints are described as those locations from which the proposal will actually be seen and include the following:</p> <ul style="list-style-type: none"> • 'Public viewpoints, including areas of land and buildings providing public access – in England and Wales this includes different forms of open access land, and public footpaths and bridleways... • Transport routes where there may be views from private vehicles and from different forms of public transport; • Places where people work.' <p>These Guidelines have been used to inform the Landscape and Visual Impact Assessment as presented in ES Chapter 29.</p> <p>In respect of Viewpoint 8 (St Andrews Lane in Necton): this viewpoint was selected as it is the most open view from the closest publicly accessible point to the National Grid substation extension, avoiding trespassing on private land. In Chapter 29 Landscape and Visual Impact Assessment of the Environmental Statement, the effects on the wider area, represented by viewpoint 8, is presented in the assessment of visual effects.</p>

2.3 Colin King

Written submission	Applicant's Response
<p>I would like to register my dissatisfaction with Vattenfall's intention to, disregard easements and rights of way.</p> <p>My assumption is, easements are dealt with in the compulsory acquisition scheme, as Vattenfall lists in their book of references 4.3, all the land at Necton Farms, Necton, as having four additional persons enjoying easements and rights of way over the land, and as such are listed as category 2 owners, and ultimately listed as claimants under section 10</p>	<p>The Applicant has been in contact with Mr King in relation to the rights which he believes his property enjoys over the land identified within the Order Limits. The Applicant is awaiting proof of these rights and has included Mr King within the Book of Reference as a precautionary measure.</p> <p>In reference to the email dated 23 August</p>

Written submission	Applicant's Response
<p>of the compulsory purchase act 1965. These 4 persons being, Colin George King, (my deceased father) Robert Haydn King, Jacqueline Ann Claxton, and Paul John King.</p> <p>On 23 Aug 2018 I asked Peter Gibbard at Ardent, by email, if he could please outline how easements are handled. The answer on 24 Aug 2018 advised: they have agreed a price per acre, with land agents along the route, for easements they wish to purchase. I have the email, but it states that it should not be copied, or emailed to anyone else, without their permission.</p> <p>As a price has been set, I surmised the same terms would apply to all easements, or they would be compulsory purchased.</p> <p>We have not been approached to discuss the situation, and I notice we were not included in the Schedule of Compulsory Acquisition Jan 2019.</p> <p>I can understand if an easement applies to a small plot of land, and the person can not be traced, this could be acceptable. When the easement in question applies to all of the Necton Substation site, and the persons can be readily reached, should this not be dealt with in a fair and responsible way?</p>	<p>2018, the price per acre that has been agreed is in relation to the new easements the Applicant is seeking to implement over affected party land for the project cables. This is not the same as existing easements which may be interfered with as a result of the construction of the project.</p> <p>As the Applicant has previously confirmed, it is currently in discussions with the freehold owners of the land and wishes to make progress in this regard in the first instance before considering the further third party rights on the land. Further and as above, the Applicant is awaiting evidence that the legal rights exist and exactly what they include.</p>

2.4 Helen and Chris Monk

Written submission	Applicant's Response
<p>Two submissions responding to the traffic intervention scheme proposed by Hornsea Project Three along the B1145 through Cawston.</p>	<p>The Applicant has undertaken a cumulative impact assessment of the combined construction traffic from Norfolk Vanguard and Hornsea Project Three passing through Cawston, which was submitted to the examination at Deadline 5 (ExA; ISH1; 10.D5.3). This includes an assessment of noise, vibration and air quality impacts.</p> <p>A range of traffic management measures are proposed within that assessment to manage potential cumulative impacts along the B1145, including enhanced pedestrian facilities, managed parking and road safety measures, avoiding term time school drop off and pick up times, as well as managing cumulative peak HGV flows. Hornsea Project Three are currently in discussion with Norfolk County Council regarding a scheme of highway mitigation that would deliver these types of measures. Norfolk Vanguard is continuing to engage with Hornsea Project Three and Norfolk County Council to further understand</p>

Written submission	Applicant's Response
	the details of this highway mitigation scheme for cumulative construction traffic with a view to adopting those measures following a review by Norfolk Vanguard to confirm appropriateness.

2.5 Peter Crossley

Written submission	Applicant's Response
<p>Concerns raised related to construction traffic passing along the B1145 through Cawston, including pedestrian amenity, noise/ vibration and air pollution. Solutions proposed include a request for onshore construction traffic to use the cable corridor for access rather than use the B1145.</p>	<p>The Applicant has undertaken a cumulative impact assessment of the combined construction traffic from Norfolk Vanguard and Hornsea Project Three passing through Cawston, which was submitted to the examination at Deadline 5 (ExA; ISH1; 10.D5.3). This includes an assessment of noise, vibration and air quality impacts.</p> <p>A range of traffic management measures are proposed within that assessment to manage potential cumulative impacts along the B1145, including enhanced pedestrian facilities, managed parking and road safety measures, avoiding term time school drop off and pick up times, as well as managing cumulative peak HGV flows. Hornsea Project Three is currently in discussion with Norfolk County Council regarding a scheme of highway mitigation that would deliver these types of measures. Norfolk Vanguard is continuing to engage with Hornsea Project Three and Norfolk County Council to further understand the details of this highway mitigation scheme for cumulative construction traffic with a view to adopting those measures following a review by Norfolk Vanguard to confirm appropriateness.</p> <p>The Applicant has a meeting with Cawston Parish Council on 11 April 2019 and wishes to discuss the current assessment and mitigation proposals through Cawston prior to formally responding to this alternative route proposal.</p>

2.6 Breckland Council

Written submission	Applicant's Response
<p>Responses to Examiner's written questions.</p> <p>Q 12.12 - A copy of a fax from 1996 was provided by Mrs Jenny Smedley. Our position is unchanged.</p> <p>Q12.14 The assessment of no increases in pollutants within the Swaffham Air Quality Management Area is agreed with.</p>	<p>Q12.12 – Noted</p> <p>Q12.14 – Noted</p> <p>Q13.19 – Noted</p> <p>Q13.20 – Noted</p> <p>Q13.21 – The construction and operation of</p>

Written submission	Applicant's Response
<p>Q13.19 The onshore project substation operational noise limits were agreed during specific topic meetings with the applicant and align with the conditions set for the existing Dudgeon Substation. These limits are cumulative so will include any contribution from the existing substation. Any future projects will also have the same noise limits so as to avoid creeping noise threshold.</p> <p>Q13.20 Modification of existing overhead line structure is not considered to contribute significantly to operational noise, therefore I agree with this approach.</p> <p>13.21 Extension to the existing Necton National Grid Substation is to be a separate application. The extension is not considered to contribute significantly to operational noise, however, it will be required to comply with noise conditions already set for the existing Substation, therefore I agree with this approach.</p> <p>Q14.33 The Council's position on the Landscape and Visual Impact Assessment is set out in the Statement of Common Ground and the Local Impact Report. Ecology matters have been addressed by Norfolk County Council.</p> <p>Q18.38 With regard to issues relating to land use and agriculture the Council's view of the scheme is set out in the Local Impact Report.</p> <p>Q20.120 Breckland Council provide their standard wording for a contaminated land planning condition.</p>	<p>the National Grid Extension forms part of the Norfolk Vanguard application for development consent, the detail of which is included in Schedule 1, Part 1, Work No.11 and Work No.11A of the draft Development Consent Order (DCO) (document reference 3.1) and the associated Works Plans (document reference 2.4). The extension does not include any significant noise emitting operational equipment that would contribute to the noise environment, hence it was not included within the operational noise model. This was agreed during the Expert Topic Group meetings and recorded within Environmental Statement (ES) Chapter 25 Noise and Vibration.</p> <p>Q14.33 – Noted</p> <p>Q18.38 – Issues related to land use and agriculture are currently under discussion between Breckland Council and the Applicant as set out in the Statement of Common Ground submitted at Deadline 4 (REP2-SOCG-2.1).</p> <p>Q20.120 – The wording provided by Breckland Council aligns with the commitments made by the Applicant within the Outline Code of Construction Practice (OCoCP). The Applicant is continuing to engage with Breckland Council to agree the wording set out in the OCoCP.</p>

2.7 The Old Kings Head

Written submission	Applicant's Response
<p>Concerns raised related to construction traffic passing along the B1145 through Cawston, including effects on local businesses, pedestrian amenity, noise/ vibration and air pollution. Solutions proposed include:</p> <ul style="list-style-type: none"> • Increasing designated car parking particularly in the centre of the village; • Reducing speed limits, widening and raising pavement heights with posts/ chicanes where possible to reduce the intimidation from vehicles; • Moving the regular and school bus stop 100m further east of the centre; • Restricting the HGVs to 9.00-5.00 (with another restriction as schools finish); and • Offering specific compensation for businesses and houses (glazing improvements would be a big improvement but costly for individuals) and gestures of investment into the village. 	<p>The Applicant has undertaken a cumulative impact assessment of the combined construction traffic from Norfolk Vanguard and Hornsea Project Three passing through Cawston, which was submitted to the examination at Deadline 5 (ExA; ISH1; 10.D5.3). This includes an assessment of noise, vibration and air quality impacts.</p> <p>A range of traffic management measures are proposed within that assessment to manage potential cumulative impacts along the B1145, including enhanced pedestrian facilities, managed parking and road safety measures, avoiding term time school drop off and pick up times, as well as managing cumulative peak HGV flows for both projects. Hornsea Project Three are currently in discussion with Norfolk County Council regarding a scheme of highway mitigation that would deliver these types of</p>

Written submission	Applicant's Response
	measures at Cawston. Norfolk Vanguard is continuing to engage with Hornsea Project Three and Norfolk County Council to further understand the details of this highway mitigation scheme for cumulative construction traffic with a view to adopting those measures following a review by Norfolk Vanguard to confirm appropriateness.

2.8 National Grid

Written submission	Applicant's Response
<p>Q12.10 – The Applicant has responded to this question not National Grid.</p> <p>Q 20.143 –National Grid are not currently clear whether the Protective Provisions are agreed. There has been correspondence between the parties and National Grid hope and anticipate that the Protective Provisions are now agreed.</p>	<p>Q12.10: Noted.</p> <p>Q20.143: The Applicant can confirm that the protective provisions with National Grid are agreed. This position is captured in an updated Statement of Common Ground which was submitted at Deadline 5 (document reference Rep2 - SOCG - 9.1).</p>

2.9 Lucy Sheringham

Written Submission	Applicant's Response
<p>Concerns raised that the onshore construction traffic diverted to Dereham would attempt to reduce the length of this diversion by turning around in smaller roads / driveways.</p> <p>Also concerns raised for vehicles arriving at site outside of the consented construction hours and attempting to wait at nearby laybys, residential areas or pub car parks.</p>	<p>The Applicant is continuing to engage with Highways England on the approach to the junction design off the A47(T) for access to the onshore project substation and National Grid substation extension.</p> <p>A technical note has been requested by Highways England for the substation access off the A47 (Substations Access Clarifications Technical Note (SACTN)), which includes details of the Dereham diversion and associated signage. The Applicant submitted the SACTN to Highways England at Deadline 4 and has also shared this with Norfolk County Council.</p> <p>Requirement 22 of the draft DCO ensures that the siting, design, layout and any access management measures for any new, permanent or temporary means of access to a highway must be approved by the relevant planning authority in consultation with the highway authority.</p> <p>Enforcement of construction traffic routes and delivery arrival times has been responded to</p>

Written Submission	Applicant's Response
	in detail in further question 12.15 submitted at Deadline 4 (ExA; FurtherWQ; 10.D4.6).

2.10 Highways England

Written submission	Applicant's Response
<p>Briefing Note 04</p> <p>Design Manual Roads and Bridges first technical review of the proposed substation accesses from the A47 provided to the Applicant in January 2019.</p>	The Applicant has previously reviewed this technical note and it has informed the Substation Access Clarification Technical Note (SACTN) submitted to Highways England at Deadline 4.
<p>Briefing Note 06</p> <p>Design Manual Roads and Bridges second technical review of the proposed substation accesses from the A47 provided to the Applicant in January 2019.</p>	The Applicant has previously reviewed this technical note and it has informed the SACTN submitted to Highways England at Deadline 4.

2.11 Natural England

Written Submission	Applicant's Response
Natural England's response to other consultees responses to the second set of Examiners questions;	The Applicant notes Natural England's comments and where applicable, outstanding points are being progressed with Natural England through the Statement of Common Ground (Rep2-SOCG-13.1).
Comments on Development Consent Order schedule of changes submitted by the Applicant at Deadline 4 [REP4-029];	The Applicant notes Natural England's comments and where applicable, outstanding points will be progressed with Natural England through the Statement of Common Ground (Rep2-SOCG-13.1).
Natural England Discretionary Advice Service letters provided to the Applicant with regards to sediment management at River Wensum crossing, Bat at Paston Great Barn SAC, water dependent sites and other unresolved issues;	In accordance with Issue Specific Hearing (ISH4) Action Point 13, the Applicant has submitted a Position Statement (document reference ExA; ISH4; 10.D6.9) regarding the Onshore Ecology Clarification Notes and Natural England's Discretionary Advice Service letters.
<p>Natural England's comments on red-throated diver mitigation measures</p> <p>Operational vessel movements</p> <p>Natural England sent details of its standard mitigation comprising advice on vessel operation procedures for vessel transit corridors to mitigate impacts to re-throated diver to the Applicant on 20 March 2019. Natural England welcome the commitment from the Applicant to consider this and await receipt of further updates from the Applicant regarding this issue.</p>	The Applicant has given consideration to the measures provided by Natural England and can confirm that these will be included in the next version of the draft DCO covering best practice measures for operational vessel movements through the Greater Wash Special Protection Area (SPA) or Outer Thames Estuary SPA (depending on where the vessels are based).

2.12 MMO

Written submission	Applicant's Response
The MMO is currently reviewing the interested parties responses and will provide further comments within the Issue Specific Hearing for the draft DCO and Deadline 6 response.	The Applicant has no response.

2.13 Happisburgh Parish Council

Written Submission	Applicant's Response
<p>I was somewhat surprised to see a Statement of Common Ground Rep 1-SOCG-24.1 version 2. Happisburgh PC has only seen the first draft back in December on the afternoon of our PC meeting and Vattenfall expected a response from that meeting, this did not give us a chance to look at it fully but what we saw we did not like so it was declined. Vattenfall then ask for some of us to meet on the days you were in Norwich as I have said before we have to give up our time from work etc. they are being paid so this was not possible. Vattenfall have been pushing for a meeting, we then did have a working party, meeting with them in early March with a understanding nothing would be sent to the examining authority until we had approved it, this has not happened. Vattenfall have pushed ahead and sent in version 2 which we had not seen. We ask that these documents on SOCG be removed. We still await a draft document based on the March meeting. I will send emails relating to this matter from Vattenfall to support this complaint under the Ref SOCG Happisburgh. With Vattenfall acting like this I think a SOCG will be hard to achieve as any trust in Vattenfall has been very badly dented again, you are our only hope of keeping them in line. Yours faithfully Glenn Berry Happisburgh PC</p>	<p>Version 2 of the SoCG (Rep 1-SOCG-24.1) as submitted by the Applicant at Deadline 4 varied from Version 1 only in so far as it noted that a meeting had taken place, including the addition in Table 1:</p> <p>“6th March, 2019; Meeting and site visit to discuss outstanding areas of concern”</p> <p>The Applicant did not consider this would be a controversial submission, as it merely provided a record of the fact that to date, there had been no agreed progress on the initial Statement of Common Ground (SoCG) as drafted by the Applicant, but acknowledged that [representatives of] Happisburgh PC had met with the Applicant on the above date. The Applicant is grateful to representatives of Happisburgh Parish Council for the time and considerable effort invested in engaging with the project. Following the meeting on 6th March, Vattenfall are updating the SoCG and will send a draft revised version of the SoCG to Happisburgh PC for their consideration.</p>

2.14 Oulton Parish Council

Written submission	Applicant's Response
<p>Oulton Parish Council seek clarification as to whether Norfolk Vanguard will commit to the whole road intervention scheme being proposed by Hornsea Project Three along The Street at Oulton. Additional queries raised include:</p> <ul style="list-style-type: none"> • Traffic management / signalling at the junction of Heydon Road; • Existing agribusiness traffic; • Proposal to open cut trench the B1149; • Cable logistics area and the total number of cable drums that may be held there; 	<p>The Applicant met with Oulton Parish Council on 27 March 2019 to discuss the issues raised within their written submission.</p> <p>The Applicant confirmed that Norfolk Vanguard will adopt the entire highway intervention scheme being proposed by Hornsea Project Three. The scheme would be introduced in full by the first project to proceed to construction and removed by the second project once both project's construction phases are complete. This</p>

Written submission	Applicant's Response
<ul style="list-style-type: none"> • Possibility of night time deliveries to the cable logistics area; and • The appropriateness of pilot vehicles along Link 75 due to the length of the link and limited passing areas. 	<p>commitment will be captured in an update to the Norfolk Vanguard Outline Traffic Management Plan.</p> <p>Traffic management will be introduced to ensure the safe operation of the junction between the Street and Heydon Road. This would be captured within the final Traffic Management Plan submitted in advance of construction, which is secured through Requirement 21.</p> <p>The Applicant is aware of the existing agribusiness traffic and welcomed Oulton Parish Council's further description of the frequency of this during the meeting held on 27 March 2019.</p> <p>Further work is currently being undertaken by the Applicant to confirm the suitability of open cut trenching across the B1149, in consultation with Norfolk County Council. Further details are provided in a position statement with Norfolk County Council submitted at Deadline 6 (ExA; ISH4; 10.D6.3).</p> <p>The cable logistics area would have the capacity to store approximately 20 cable drums. The Applicant confirmed with Oulton Parish Council on 27 March 2019 that the construction methodology requires cable drums to be delivered directly to the cable joints. A number of cable drums may be stored at the cable logistics area to act as a buffer however the intention is for the majority of cable drums to be delivered directly to the joint locations. The total number of cable drums required for the entire onshore cable route is approximately 360 which is set out in Appendix 24.4 of ES Chapter 24 Traffic and Transport.</p> <p>The consented working hours are 07.00 to 19.00 Monday to Friday and 07.00 to 13.00 on Saturdays as defined in DCO Requirement 26. Working outside of these hours is only permitted for essential activities, and their duration and timing must be agreed in advance of the works with the relevant planning authority (save for emergency works). Cable drum deliveries would typically be by low loader which would not require night time delivery.</p> <p>Link 75 has been identified in the Outline Traffic Management Plan (OTMP) (DCO doc: 8.8) as requiring mobile traffic management (pilot vehicles). The OTMP highlights that</p>

Written submission	Applicant's Response
	"some localised carriage widening may be required", i.e. the introduction of passing places where required.

2.15 Orsted

Written submission	Applicant's Response
Orsted understands that protective provisions for the benefit of Hornsea Three will be included in the next version of the dDCO. However, Orsted wishes to reserve its position to submit further detailed representations on this matter in the event that the form of protective provisions for the benefit of Hornsea Three is not agreed with the Applicant prior to the end of the Examination.	The Applicant notes the submission from Orsted. The Applicant is reviewing the final form of Protective Provisions and hopes to include Protective Provisions for the benefit of Orsted within the next version of the draft DCO.

2.16 Cawston Parish Council

Written submission	Applicant's Response
<p>A cable route realignment is proposed by Cawston Parish Council to the north of Cawston Village which would increase the distance of separation of the works from residential properties (Westland, Beerhouse Cottage and Sovereign Cottages) in the hamlet of Sygate.</p> <p>A proposal by Cawston Parish Council to use the Norfolk Vanguard running track between the B1145 and the B1149 to take construction traffic from both Norfolk vanguard and Hornsea Project Three to avoid the need to route traffic along the B1145 through Cawston.</p>	<p>Westland was identified as a noise sensitive receptor in ES Chapter 25 Noise and Vibration (CRR13). The noise impact assessment determined that no significant impacts would occur at this property. Beerhouse Cottage and Sovereign Cottage were not specifically identified as receptors within Chapter 25, but other properties at closer distances were assessed. A construction noise management plan will be developed in advance of construction, which is captured in the Outline Code of Construction Practice and secured through Requirement 20. This will set out the site specific detail for mitigating any potential construction noise impacts, such as the introduction of noise barriers. It should be noted that the cable duct installation works will be undertaken in a sectionalised approach, working on 150m sections at a time. The time taken from topsoil strip to reinstatement at each 150m section will take approximately two weeks.</p> <p>The Applicant has a meeting with Cawston Parish Council on 11 April 2019 and wishes to discuss the cumulative traffic impact assessment and mitigation proposals through Cawston prior to formally responding to this alternative route proposal.</p>

2.17 Trinity House

Written submission	Applicant's Response
Trinity House confirms its agreement with the Applicant's proposed revised wording to Article 38(1) of the Development Consent Order, noting that the Arbitration provision does not overrule Trinity House's saving provision at Article 41.	The Applicant welcomes this confirmation.