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To: [Norfolk Vanguard](#)
Subject: NNDC Deadline 8 Submission
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Attachments: [NNDC Deadline 8 Submissions 30 May 2019 Final.pdf](#)

Dear Examining Authority,

Please find attached the Norfolk Vanguard Deadline 8 response from North Norfolk District Council (INTERESTED PARTY REF: 20012882).

Please could you confirm receipt of this document.

Kind Regards

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**NORTH
NORFOLK
DISTRICT
COUNCIL**

Norfolk Vanguard Offshore Wind Farm

REPRESENTATIONS FOLLOWING DEADLINE 7 SUBMISSIONS

NORTH NORFOLK DISTRICT COUNCIL
(INTERESTED PARTY REF: 20012882)

DEADLINE 8 – 30 MAY 2019

Table of Contents

1. Introduction.....	2
2. Report on the Implications for European Sites RIES.....	2
3. Tourism Impacts and Proposed New Requirement.....	2
4. Impact on Trees.....	3
5. Clarifications Concerning Noise Impacts.....	3
6. Examining Authority’s Rule 17 requests for further information or written comments (issued on 21 May 2019).....	7
7. Updated Statement of Common Ground.....	7

1. Introduction

1.1. These are North Norfolk District Council's written submissions following:

- publication of the Applicant's Deadline 7 submissions,
- publication of the Report on the Implications for European Sites (RIES) by the Examining Authority on 9 May 2019,
- publication of the Examining Authority's schedule of changes to the draft Development Consent Order (issued 09 May 2019) and
- publication of the Examining Authority's Rule 17 requests for further information or written comments (issued on 21 May 2019).

2. Report on the Implications for European Sites RIES

2.1. NNDC have reviewed the Report on the Implications for European Sites Published by the Examining Authority on 9 May 2019. The main European Site feature in North Norfolk concerns Barbastelle bats at Paston Great Barn, designated as a Special Area of Conservation (SAC).

2.2. NNDC note the findings of Natural England that it has withdrawn its concerns in relation to bats at Paston Great Barn. NNDC concur with the conclusions of Natural England that the OLEMS/EMP should include improvement of hedgerows and a mitigation plan until the affected hedgerow has fully recovered.

3. Tourism Impacts and Proposed New Requirement

3.1. NNDC welcomes the Examining Authority's schedule of changes to the draft Development Consent Order (Issued 09 May 2019) and the proposed inclusion of new Requirement 34 (tourism and associated business impact mitigation strategy) which address concerns raised by NNDC at Deadline 7.

4. Impact on Trees

- 4.1. NNDC welcomes the Examining Authority's schedule of changes to the draft Development Consent Order (Issued 09 May 2019) and the proposed inclusion of Requirement 18 (d) requiring 'details of existing trees to be removed' which will ensure better understanding of tree removal proposed and consequent replanting considered necessary under this Requirement and addresses concerns raised by NNDC at Deadline 7.

5. Clarifications Concerning Noise Impacts

- 5.1. NNDC have reviewed the following documents submitted by the Applicant at Deadline 7:

- Applicant's revised draft DCO (REP7-004)
- Outline Code of Construction Practice (REP7-007)
- Outline Traffic Management Plan (REP7-014)
- Little London and Happisburgh Position Statement (REP7-048)
- The Examining Authority's schedule of changes to the draft Development Consent Order (Issued 09 May 2019)

- 5.2. NNDC has the following observations:

Little London and Happisburgh Position Statement

- 5.3. NNDC generally welcome the proposals put forward by the applicant. Pre-construction works as set out in Section 4 Construction Programme (Stage Definitions) are proposed to be via construction accesses (AC37) rather than the highway network taking the pressure away from Little London Road which is welcomed by NNDC.

- 5.4. In respect of Stage 2 Duct installation works, the Applicant is proposing use of a Pilot vehicle to accompany 10 tonne HGVs arriving as a platoon from MA10 Mobilisation Area with an estimate of 1 platoon departure and arrival per hour of 3 HGVs. Whilst NNDC are supportive of these control measures, further assurances are needed on a speed limit to be set for the platoon and the hours within which the platoon would operate (NNDC preference would be for compressed hours so as to avoid soon after 7am and close to 7pm).
- 5.5. In respect of the duration of the works, it is noted that the construction programme could be increased from 12 weeks to 24 weeks which could allow more flexibility on working hours to avoid sensitive times. Whilst there are disadvantages in extending the construction period for residents, it may allow compressed hours for delivery and this approach would be broadly welcomed by NNDC. Community engagement with local residents and businesses including establishing clear lines of communication will play a vital role in ensuring resolution of complaints in relation to noise and securing further mitigation in terms of identifying less noise sensitive times for vehicle movements.
- 5.6. NNDC would welcome and encourage the Applicant to locate the reception sides of TC 14 and TC 15 to the area which Link 69 serves given the predicted reduction from 144 daily movements to 48 daily movements as referenced in Section 5.1 (Stage 2 - Traffic Demand and Duration) and Table 5.3. This should assist in the reduction of noise and disturbance impacts for residents along Little London Road.
- 5.7. Section 6.3 of the document relates to employee transport and NNDC welcome the suggestion to use crew vans and car sharing to reduce employee vehicle use and for this to be secured within the Outline Travel Plan.
- 5.8. In respect of works affecting Happisburgh, NNDC's position remains the same as set out at Deadline 7.

Happisburgh (Construction Noise Mitigation)

5.9. NNDC continue to have concerns about adverse impacts from night working at location: LFR2H which mean that without agreed further mitigation there is the potential for sleep disturbance and adverse impacts on residents, businesses and tourism. The Applicant has highlighted three processes within the ES Appendix 25.2 - Construction Phase Assessment (APP-295) where an adverse impact will arise from night time working. These include (set out on page 9 of that document):

- Table 25.8 - Landfall Pre construction night- time
- Table 25.9 - Duct installation night time
- Table 25.10 - Landfall – Cable pull, joint and commission night-time

5.10. The Applicant sets out in their clarification document two scenarios in relation to landfall works; one involving extended working 24 hours a day, 7 days a week over a 14-week period and a second using standard construction working hours over a 20-week period.

5.11. In the 24 hours option the Applicant refers to daily personnel changes outside of the 7am to 7pm period if a 3 x 8hr shift pattern were proposed. The Applicant also refers to four HGV movements between 7am to 7pm at weekends associated with arisings from the drill activities.

5.12. The Applicant has set out the perceived advantages for night working enabling shorter total construction duration in the area reducing this timeframe from 20 weeks down to 14 weeks and have suggested there are technical construction process advantages such as reduced risk of drill failure from continuous working. However, there are serious concerns regarding sleep disturbance and an adverse impact on local amenity from construction activities taking place 24 hours a day such that it is the opinion of NNDC that the 20-week construction period using standard construction working hours would be preferable from an amenity perspective.

5.13. Should there be technical reasons for undertaking 24 hour working at landfall, NNDC would need to be satisfied that the Applicant has demonstrated effective enhanced mitigation to reduce noise to minimum levels. NNDC would welcome further discussions with the Applicant to ensure that landfall construction activities do not adversely impact on amenity.

Outline Code of Construction Practice

5.14. Whilst NNDC welcome the inclusion of Section 9.1.2 Enhanced Mitigation using temporary noise barriers for fixed plant and work areas, NNDC still have serious concerns about the adverse impact on local amenity and potential sleep disturbance from other noise sources such as construction traffic. These matters require further discussion with the Applicant to ensure that landfall construction traffic and associated activities and worker movements do not adversely impact on amenity.

5.15. In terms of drafting, NNDC highlight the following:

- BS 5228 (dealing with noise) should be added to the list of guidance in paragraph 25 which each construction method statement will follow;
- Paragraph 56, dealing with woodland/hedgerow protection and fencing, cross-refers to the OLEMS. However, the revised OLEMS does not address this or give the further detail envisaged in paragraph 56, nor does the OLEMS refer to Requirement 18.

Outline Traffic Management Plan

5.16. Whilst the majority of the issues within the Outline Traffic Management Plan are for the Highway Authority to consider, the main area of relevance to NNDC is the mitigation of construction noise in the Little London area as described in the Little London and Happisburgh Position Statement where there is a Proposed Traffic Management Strategy (see above).

The Examining Authority's schedule of changes to the draft Development Consent Order (Issued 09 May 2019)

5.17. NNDC welcome the amendments to Requirements 20(2) and 26.

Other Matters

5.18. NNDC continues to await clarification from the Applicant in respect of proposed fencing to compounds at Happisburgh and MA8 near Holly Farm Barningham.

6. Examining Authority's Rule 17 requests for further information or written comments (issued on 21 May 2019)

6.1. NNDC notes that there were no questions directed to North Norfolk District Council for reply.

7. Updated Statement of Common Ground

7.1. NNDC have worked with the Applicant to produce an update to the Statement of Common Ground (SoCG) as version 3 and which updates the position of both parties following the submission of various additional documents since version 2 was submitted at Deadline 4. The Applicant has indicated that they will submit the updated SoCG at Deadline 8.

30 MAY 2019