



**NORTH
NORFOLK
DISTRICT
COUNCIL**

Hornsea Project Three Offshore Wind Farm

LOCAL IMPACT REPORT

NORTH NORFOLK DISTRICT COUNCIL

(INTERESTED PARTY REF: 20010749)

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1. Introduction

- 1.1. This report sets out North Norfolk District Council's position in relation to the Development Consent Order (DCO) application for Hornsea Project Three offshore wind farm made under Section 56 of the Planning Act (2008).
- 1.2. North Norfolk District Council (NNDC) is an Interested Party to this Nationally Significant Infrastructure Project (NSIP) with offshore cables reaching landfall near Weybourne and the onshore cable corridor passing through the District together with the construction of associated infrastructure including an onshore booster station, dependent on electricity transmission choice.
- 1.3. In responding to this NSIP application, NNDC has drawn from, amongst other things, internal expertise in relation to:
 - Coastal Processes
 - Landscape and Visual Impacts
 - Ecology
 - Environmental Protection
 - Economic Development
- 1.4. In assessing development proposals under exercise of its functions as a Local Planning Authority, NNDC would normally seek advice from external partners including Norfolk County Council who undertake a number of functions including as Highway Authority, Public Rights of Way and Lead Local Flood Authority. Where stated within this report, NNDC will defer matters for consideration/comment of the County Council given their statutory roles and considered knowledge/expertise.

2. Description of North Norfolk

- 2.1. NNDC's jurisdiction extends inland from the Mean Low-Water mark along the coastline. The proposal would affect land within NNDC stretching from the intertidal area at Weybourne and inland along the proposed cable route and 80m wide working corridor until it passes out of the district into Broadland District Council near to Corpusty and Saxthorpe.
- 2.2. North Norfolk District covers an area of 87,040 hectares (340 square miles) (excluding the Broads Authority Executive Area), with a 73km (45 mile) North Sea coastline. A significant proportion of the District is included within the nationally designated Norfolk Coast Area of Outstanding Natural Beauty (AONB) and the North Norfolk Heritage Coast. The eastern end of the District also adjoins The Broads, which has the status of a National Park.
- 2.3. The main settlements in the District comprise seven towns (Cromer, Fakenham, Holt, North Walsham, Sheringham, Stalham and Wells-next-the-Sea) and three large villages (Briston / Melton Constable, Hoveton & Mundesley), which accommodate approximately half of the District's population (101,149 at the 2011 Census).
- 2.4. The District's main road network comprises the A140 (Cromer to Norwich), the A148 (Cromer to King's Lynn - via Holt and Fakenham) and the A1065 (Fakenham to Mildenhall), as well as the more minor A1067, A149 and A1151. There is only one public rail service in the District, comprising the 'Bittern Line' linking Sheringham with Norwich.
- 2.5. The District has a strongly rural character with agriculture, in particular arable farmland, comprising by far the largest component of land use.

- 2.6. A network of Rights of Way crosses open fields, heathlands and woodlands. Many of the large areas of coastline, heathland and woodland have open access. The Norfolk Coast Path National Trail follows the entirety of the District's coastline, linking with the Peddars Way in the west and the Paston Way in the east.
- 2.7. There are many positive aspects of the North Norfolk environment, such as:
- The stunning landscape of the North Norfolk Coast AONB, carefully managed by the Norfolk Coast Partnership to ensure it can be enjoyed by generations to come.
 - The large number of internationally and nationally designated sites and nature reserves, home to many rare and protected species and landscapes.
 - The wealth of archaeological and historic environment sites throughout the district, from the prehistoric to the Cold War.
 - The rare arable plants thriving in pockets of North Norfolk farmland.
 - The conservation groups, organisations and individuals working hard to record, protect and enhance the natural environment of North Norfolk.
- 2.8. The District contains a large number of agricultural holdings which are predominantly arable in nature and which include areas containing some of the best and most versatile agricultural land.
- 2.9. The District also has a significant tourism economy supporting 11,352 jobs (28% of total employment in North Norfolk) in 2017 with a total tourism value of £505m. The North Norfolk Core Strategy recognises the importance of tourism to the district. The strategic vision for North Norfolk in section 2 of the Core Strategy includes at paragraph 2.1.4:
- “**Sustainable tourism**, building on the unique natural assets of the countryside and coast, will be a major source of local income and employment and will be supported by an enhanced network of long-distance paths and cycle routes such as the North Norfolk Coastal Path and Weavers Way.”*

3. Principle of Renewable Energy

- 3.1. NNDC 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. Accordingly, the project's contribution to renewable energy is a significant **positive impact**.
- 3.2. At a local level, NNDC has made a significant contribution of its own through, amongst other things, the grant of planning permission for in excess of 150MW capacity of solar farms, with electrical output capable of powering over 40,000 homes, in North Norfolk. This has been delivered without significant adverse impacts on the wider landscape (including development within and/or adjacent to the Norfolk Coast Area of Outstanding Natural Beauty) through, amongst other things, careful siting and design.
- 3.3. The onshore element of Hornsea Project Three passes through some of the District's most sensitive and valued landscapes and this emphasises the importance of key design considerations which will help to reduce overall impacts, both short, medium and long-term.

4. Choice of Transmission System

- 4.1. The final chosen method of transmission of electricity to the onshore grid connection location will have a fundamental bearing on the overall impact of the project. Whilst it is recognised that Ørsted Hornsea Project Three (UK) Limited wish to keep their options open to using either HVAC or HVDC, this does currently present a wide project envelope and increases the level of uncertainty for affected parties until such time as the final transmission method is chosen.
- 4.2. In considering the potential impacts of the proposal on the District of North Norfolk, it is recognised that all transmission options remain open for consideration and NNDC are engaging with Ørsted on this basis.
- 4.3. However, it is the view of NNDC that there is the potential for greater impact on North Norfolk District with a high voltage alternating current (HVAC) transmission system as opposed to a high voltage direct current (HVDC) transmission system.
- 4.4. A HVDC transmission system would have fewer cable circuits meaning that, along the entire route, there would be a need for fewer buried cables compared with HVAC. This means that installation times would likely be reduced and, in turn, agricultural land would be taken out of production for a shorter duration (further reduced if Ørsted can make the commitment to duct both phases of the project in one phase).
- 4.5. Fewer cables associated with HVDC will also reduce the number of Horizontal Directional Drills required across the cable route including when bring cables onshore to the jointing bays near Weybourne. This in turn will reduce the time period when the Norfolk Coast Path will need to be diverted.

- 4.6. A shorter construction duration will reduce the potential adverse impacts on the North Norfolk tourist economy which underpins 28% of employment within the District and which would be highly sensitive to an extended duration of construction activity.
- 4.7. A HVDC transmission system would also negate the need for a booster station within North Norfolk near to Edgefield/Corpusty and reduce the need for not insubstantial mitigation in order to make this aspect of the proposal
- 4.8. Accordingly, it would be **positive** for Ørsted to choose a HVDC transmission system, and **negative** to choose a HVAC transmission system.

5. Marine Processes

- 5.1. NNDC's jurisdiction extends inland from the Mean Low-Water mark. This means that an element of the marine processes falls within the consideration of NNDC at the point where offshore cables come onshore.
- 5.2. The main area of interest for NNDC is in relation to the method of bringing offshore cables onshore in the Weybourne area including the potential impact of works on nearshore coastal processes together with the potential to affect the cliff, shore platform and shingle bank.
- 5.3. NNDC clearly expressed a preference for bringing cables onshore via the use of Horizontal Directional Drilling at both Preliminary Environmental Information Report (PEIR) stage and through recent Relevant Representations. At PEIR stage NNDC said:

'Whilst the method of construction in the nearshore/landfall location needs to be considered further and in more detail, initial consideration is that a Horizontal Direct Drilling (HDD) approach would prove to be the least likely to have impacts on nearshore processes during construction and would be preferred. This should (in consideration with other marine environmental factors) be at an extent where HDD exit points have minimal impact on nearshore coastal processes...'

- 5.4. The Environmental Statement (Paragraphs 1.11.5.19 to 1.11.5.26 of Volume 2, Chapter 1: Marine Processes) considers the impact during construction but does not consider longer term post construction implications. NNDC has concerns about whether open cut trenching would impact on cliff, shore platform and shingle bank consolidation potentially leading to increased erosion in future years and weaknesses during storm events.
- 5.5. Mechanical shingle bank movement is known in this location to cause loss of sediment fines thus weakening the bank structure leading to beach/shingle bank losses. Similarly, excavation of the consolidated cliff material is likely to lead to weaknesses in the cliff at locations where cabling is present. Trenching and finally burial to a depth of 2m (although suggested 3m depth in other locations within the document) across the foreshore, cliff etc. will leave little resilience to the cabling over longer term trends of coast erosion and foreshore lowering.
- 5.6. NNDC are concerned to read at para 3.6.12.23 of the Environmental Statement Project Description that Open Cut installation will require beach closures of up to one month per cable. It is understood there would be 6 offshore cables using HVAC transmission or there would be 4 offshore cables (plus one HVAC cable) with HVDC transmission. This would suggest potential beach closure of up to six months in the worst case HVAC scenario.

- 5.7. NNDC maintains a strong objection to the use of open cut trenching to bring cables onshore to the transition joint bays at Weybourne, both from the perspective of impacting nearshore coastal processes and impact on the local tourism economy through closure of this part of the beach – including diversion of the Norfolk Coast Path for a period of up to six months. The use of open cut trenching would result in a significant **negative** impact.
- 5.8. NNDC have no objection to bringing cables onshore via use of Horizontal Directional Drilling (HDD) and this remains the Council's preferred method of bringing cables onshore, as this would be a **neutral** impact. This preferred method should be secured within the Development Consent Order so as to eliminate the option for open-cut trenching from any final consent.

6. Ecology and Nature Conservation

- 6.1. NNDC consider that Section 3.4 of Volume 3, Chapter 3: Ecology and Nature Conservation of the Environmental Statement covers relevant national policy with respect to ecology and nature conservation.
- 6.2. The approach to determining the baseline for the ecology assessment was agreed through the Expert Working Group process (the Onshore Ecology Expert Working Group) and is considered appropriate.
- 6.3. NNDC recognise that Ørsted have undertaken desktop studies and Phase 1 Habitat Surveys together with site specific surveys in accordance with best practice recommendations in order to inform the baseline data which underpins Environmental Statement Volume 3, Chapter 3 – Ecology and Nature Conservation.
- 6.4. The assessment methodology for the ecology assessment was agreed through the Expert Working Group process (the Onshore Ecology Expert

Working Group) and is considered appropriate. NNDC was part of the expert working group process and consider the assessment methodology to be acceptable.

- 6.5. Subject to issues surrounding the potential effects on Pink Footed Geese, NNDC are satisfied that the potential effects on ecology and nature conservation have been adequately assessed.
- 6.6. Section 3.10 of the Environmental Statement Volume 3, Chapter 3 – Ecology and Nature Conservation sets out Measures to be adopted as part of Hornsea Three and these are welcomed by NNDC and should be secured within any consent. However, there remains a question mark about actual quantity of mitigation and enhancement features following post-construction. For example, how is “proportionate replacement” defined (post construction measures table 3.19)? Why post-construction remediation? Will there not be a period of habitat loss until remediated? Similar questions arise for mitigation and enhancement for trees removed and trees lost.
- 6.7. The 100m wide limit referred to in Landscape Management Plan (para 4.1.1.3) should be broadened as this distance is considered too prescriptive. The LMP refers to needing agreement of landowner. Does this mean some mitigation planting might not take place if the landowner does not want it? This should be clarified by Ørsted.
- 6.8. NNDC welcomes the use of Horizontal Directional Drilling (HDD) techniques so as to avoid sensitive or designated sites in order to minimise any potential impacts upon them.
- 6.9. NNDC welcome the commitment from Ørsted to replace the loss of all hedgerows with species rich hedgerows, as identified in Section 3.11 of Volume 3, Chapter 3: Ecology and Nature Conservation of the Environmental

Statement. However, the mitigation measures in Table 3.19 of the Environment Statement (Section 3.10) should ensure that the adopted measures identify species rich replacement hedgerows. NNDC also welcome the commitment for enhancement planting to improve connectivity and species diversity including the planting of native hedgerow trees at a suitable distance from the onshore cable corridor.

- 6.10. The measures concerning hedgerows and enhancement planting will result in a **positive** effect. However, NNDC considers that this positive effect will be dependent upon an appropriate maintenance regime by landowners once hedgerows have matured and is concerned about how this will be secured.
- 6.11. Table 3.19 within Volume 3, Chapter 3: Ecology and Nature Conservation of the Environmental Statement refers to shallow rooted hedgerow species. Ørsted should state the species that would be considered suitable replacements so that NNDC can be certain that suitable species diversity can be achieved.
- 6.12. NNDC is satisfied that, subject to the above comments, the measures adopted in relation to the loss of hedgerows/trees/woodland are sufficient given the minor adverse effect of the proposed development.
- 6.13. NNDC considers the requirements to produce both an Ecological Management Plan (EMP) (Schedule 1, Part 3, Requirement 10 of the draft DCO) and a Code of Construction Practice (CoCP) (Schedule 1, Part 3, Requirement 17 of the draft DCO) that must be approved by any relevant planning authority (including NNDC) prior to the commencement of works are appropriate control measures for managing the potential effects on ecology and nature conservation.

- 6.14. With respect to the mitigation of the lost bat roost potential from removed trees (in Section 9.2.1.5 of the Outline EMP), it is not clear in the document what the mitigation proposals are. Ørsted should confirm these.
- 6.15. NNDC consider that, subject to confirmation of points raised within this document (and associated Statement of Common Ground), the measures set out within the Outline Code of Construction Practice and Outline Environmental Management Plan are sufficient and appropriate to manage impacts relating to ecology and nature conservation. Accordingly, any **negative** effects can be addressed.

7. Landscape and Visual Resources

- 7.1. NNDC consider that Section 4.4 of Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement has identified all appropriate plans and policies at a national level relevant to landscape and visual resources.
- 7.2. However, in respect of relevant Local Policy and material planning considerations, in 2018 NNDC commissioned two new studies:
- i) revised Landscape Character Assessment; and
 - ii) a new Landscape Sensitivity Assessment (with particularly reference to renewable energy and low carbon development).
- 7.3. Both of these documents have been published in final form and represent the most up to date and accurate assessment, based on current best practice. Public consultation on these documents is expected to take place in Feb/Mar 2019 with adoption as Supplementary Planning Documents in Spring/Summer 2019.

- 7.4. NNDC consider that the baseline environment needs to take account of these new resources.
- 7.5. NNDC consider that the assessment methodology and maximum design scenarios, as outlined in Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement, are appropriate based on the information presented in Volume 1, Chapter 3: Project Description of the Environmental Statement (Document A6.1.3).
- 7.6. NNDC consider that the selected viewpoints and visualisations, as set out in Appendix A of Volume 6, Annex 4.1: Landscape and Visual Impact Assessment Methodology and Volume 6, Annex 4.5: Photographs, Wirelines and Photomontages, provide a sufficient basis on which to assess the likely landscape and visual impact.
- 7.7. NNDC consider that potential effects on landscape and visual resources during the construction, operation and maintenance, and decommissioning of Hornsea Three in Section 4.11 of Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement have been fully assessed.
- 7.8. However, in respect of mitigation, NNDC consider that positive effects will be dependent upon an appropriate the maintenance regime by landowners once hedgerows have matured and is concerned about how this will be secured within the DCO.
- 7.9. Table 3.19 of the Environmental Statement Volume 3, Chapter 3 – Ecology and Nature Conservation refers to shallow rooted hedgerow species – NNDC would welcome the opportunity to input into species selection so that suitable species diversity can be achieved and the species are locally appropriate.

- 7.10. Subject to some further refinement and clarifications, NNDC are reasonably satisfied that the measures adopted in relation to the loss of hedgerows/trees/woodland will be sufficient.
- 7.11. NNDC support the principle of early implementation of sections of mitigation planting in relation to the booster station.
- 7.12. NNDC would like to see more evergreen species added into the mix, e.g. include trees such as Holm Oak and Scots Pine and a percentage of Holly into the Woodland Edge mix. The proposed Woodland Edge planting around the booster station should be planted at a higher density than 1m centres to create denser cover more quickly. 50cm centres would be more appropriate
- 7.13. In relation to replacement hedge planting along the cable corridor route, NNDC would welcome the opportunity to input into species selection so that suitable species diversity can be achieved and the species are locally appropriate.
- 7.14. NNDC welcome the commitment from Ørsted to produce both a Landscape Management Plan (LMP) (Schedule 1, Part 3, Requirement 8 of the draft DCO) in conjunction with an Ecological Management Plan (EMP) (Schedule 1, Part 3, Requirement 10 of the draft DCO), and a Code of Construction Practice (CoCP) (Schedule 1, Part 3, Requirement 17 of the draft DCO), that must be approved by any relevant planning authority (including NNDC) prior to the commencement of works. These are considered appropriate control measures for managing the potential effects on landscape and visual resources.
- 7.15. The requirement to agree details including the layout, scale, finished ground levels, external appearance, materials, access and circulation areas, and timetables for the landscaping works at the onshore HVAC booster station will

be submitted to and approved by the NNDC prior to commencement of construction (Schedule 1, Part 3, Requirement 7 of the draft DCO) is welcomed by NNDC. However this should be widened to include agreement of external lighting given the site's location in a dark skies area.

- 7.16. In respect of the management measures described in the Outline LMP (Document A8.7), Outline EMP (Document A8.6) and Outline CoCP (Document A8.5), NNDC would request that, in respect of woodland and woodland edges (OLMP para 5.3.1.1), plant failures should be replaced for a period of 10 years following planting.
- 7.17. In respect of OLMP para 5.3.2, NNDC request clarification as to the intention to manage the woodland through coppicing. NNDC consider that a full woodland management plan is required.
- 7.18. In respect of the principles of maintenance and management of proposed planting at the onshore HVAC booster station as set out in Section 5 of the Outline LMP are appropriate, in addition to the above observations, NNDC request clarification as to who will be undertaking management of all planting and how this would be secured.
- 7.19. Overall, there are therefore potential **negative** effects on landscape and visual resources. With clarification from Ørsted as requested above, these negative effects should be capable of appropriate mitigation.

8. Land Use and Recreation

- 8.1. With the exception of reference to a now out of date 2012 NPPF, NNDC consider that Section 6.4 of Volume 3, Chapter 6: Land Use and Recreation of the Environmental Statement has identified all appropriate plans and

policies relevant to land use and recreation in the application area. (Note, tourism is dealt with under Socio-economics in section 12 below).

- 8.2. NNDC consider that Sufficient primary and secondary data, as listed in Section 6.6 of Volume 3, Chapter 6: Land Use and Recreation of the Environmental Statement, has been collated to appropriately characterise the baseline environment (in Section 6.7 of Volume 3, Chapter 6: Land Use and Recreation of the Environmental Statement) to inform the EIA.
- 8.3. The future baseline identified to inform the EIA in Section 6.7.5 of Volume 3, Chapter 6: Land Use and Recreation of the Environmental Statement is considered appropriate.
- 8.4. NNDC consider that the potential impacts identified in Section 6.11 of Volume 3, Chapter 6: Land Use and Recreation of the Environmental Statement represent a comprehensive list of potential impacts on land use and recreation from the construction, operation and maintenance and/or decommissioning of Hornsea Three.
- 8.5. In respect of the assessment methodology and maximum design scenarios, as outlined in Volume 3, Chapter 6: Land Use and Recreation of the Environmental Statement, NNDC welcome the commitment from Ørsted to duct the first phase of Hornsea Project Three and the second phase (if certain circumstances arise).
- 8.6. However, NNDC consider that, in order to reduce the potential adverse impacts on soil quality from multiple occurrences of soil stripping, storage and reinstatement and to reduce the longevity of adverse impacts on active agricultural use, all ducting should be completed in a single phase.

- 8.7. NNDC consider that by laying all ducting in a single phase, a simpler cable pull through process would be possible in phase two which would help reduce disturbance impacts and speed up project completion. It would also help reduce the impacts from construction traffic in phase two by reducing the need for vehicles bringing imported stabilised backfill material over a wide time period. Completing the majority of trench works in phase one would also allow time for soils to recover and reduce the length of time taken out of agricultural production.
- 8.8. The assessment of potential effects on land use and recreation during the construction, operation and maintenance, and decommissioning of Hornsea Three within Section 6.11 of Volume 3, Chapter 6: Land Use and Recreation of the Environmental Statement is considered to be broadly agreed.
- 8.9. In respect of the embedded measures identified in Section 6.10 of Volume 3, Chapter 6: Land Use and Recreation of the Environmental Statement, the Outline CoCP (Document A8.5) and Outline Construction Traffic Management Plan (CTMP) (Document A8.2), whilst the high level measures set out in Section 6.10 are acceptable, further mitigation to reduce adverse impacts could be achieved through initial design choices about cable ducting (see above).
- 8.10. In respect of the commitment to produce both a CTMP (Schedule 1, Part 3, Requirement 18 of the draft DCO), Code of Construction Practice (CoCP) (Schedule 1, Part 3, Requirement 17 of the draft DCO), that must be approved by any relevant planning authority (including NNDC) prior to the commencement of works, NNDC welcome these commitments which will help to reduce potential adverse impacts. However, please see above in respect of request for cable ducting which will further reduce potential adverse impacts and which should be in built into the DCO.

- 8.11. In respect of the management measures described to minimise impacts on land use and recreation in the Outline CTMP (Document A8.2) and Outline CoCP (Document A8.5), these management measures are welcomed but there are concerns that some aspects use vague/loose terminology as to what will actually happen. This makes it hard to understand overall impact (for example see para 6.8.1.1 of Outline CoCP in reference to soil management). It would be expected that these matters will be clarified when approving current requirement 17 and 18 of the DCO.
- 8.12. In respect of the commitment to submit a PRow Management Plan (Schedule 1, Part 3 Requirement 17 or the draft DCO) to be approved by NNDC as the relevant planning authority, and developed in consultation with Norfolk County Council and NNDC, Schedule 1, Part 3 Requirement 17 or the draft DCO (as originally submitted) does not specifically refer to the need to submit a PRow Management Plan. The requirement relates to a code of construction practice (which must accord with the outline code of construction practice). Paragraphs 6.8.1.7 to 6.8.1.22 of the Outline CoCP refer to Public Rights of Way Management Measures but this again does not specifically imply submission of a PRow Management Plan.
- 8.13. The relevant measures set out in the Outline CoCP make sense but Ørsted should clarify reference to the PRow Management Plan and how this would be secured and agreed given the potential adverse impacts that could occur across North Norfolk, particularly to the Norfolk Coast Path and Peddar's Way during construction.
- 8.14. Overall, there are therefore potential **negative** effects on land use and recreation. With clarification from Ørsted as requested above, these negative effects should be capable of appropriate mitigation.

9. Traffic and Transport

- 9.1. In respect of Traffic and Transport matters within the Environmental Statement, NNDC do not wish to comment specifically 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 NNDC.
- 9.2. North Norfolk has many small and narrow country roads with restricted widths and limited opportunities for larger vehicles to pass each other. Traffic levels vary but tourism during March to October (heighted during the summer months especially near coastal locations) means that the timing of any construction works will be critical to minimising adverse highway impacts. Managing HGV traffic including routing will be critical in helping minimise impacts. NNDC welcome the need to agree a CoCP and CTMP as part of requirements 17 and 18 of the DCO.
- 9.3. Appropriate measures to reduce damage to roads and verges from construction traffic is welcomed by NNDC working with the Highway Authority. A condition survey secured by requirement 18 of the DCO is considered appropriate.
- 9.4. NNDC are committed to working with the County Council as Highway Authority in respect of any requirements for matters to be approved under Schedule 1, Part 3 where such matters may have an impact on North Norfolk District.

10. Noise and Vibration

- 10.1. In respect of Section 8.4 of Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement, NNDC consider that the project has given regard to appropriate plans and policies relevant to noise and vibration in the application area.
- 10.2. In respect of primary and secondary data, as listed in Section 8.6 of Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement, NNDC have no adverse comments in respect of the applicant's noise assessment methodology, including the baseline monitoring.
- 10.3. NNDC have no adverse comments in respect of the future baseline identified to inform the EIA in Section 8.7.3 of Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement.
- 10.4. In respect of the potential impacts identified in Section 8.12 of Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement, NNDC have no adverse comments in respect of the assessment methodology. Potential impacts of all stages have been identified.
- 10.5. In respect of the assessment methodology and maximum design scenario as outlined in Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement, there remain some questions about the operation design criteria in respect of the operation of the booster station and tonal and frequency elements of the noise (including future monitoring). There is potential for frequency and 'hum' effects. The single decibel value noise rating level criteria 34 dB L_Ar,Tr may not describe and assess any tonal and hum issues.

- 10.6. In respect of Section 8.12.2.29 regarding future monitoring of equipment operation is considered to be necessary to ensure any frequency and hum effects are identified and resolved.
- 10.7. In respect of embedded measures identified in Section 8.11 of Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement the Outline CoCP (Document A8.5), NNDC agree with the Best Practicable Means measures set out in the first row of Table 8.21 in Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement. NNDC also agree with the construction noise management measures set out in Table 8.21. NNDC also agree with the Noise Management Plan in the fourth row of Table 8.21. However, there remain some questions about the operation design criteria in respect of the operation of the booster station and tonal and frequency elements of the noise (including future monitoring). There is potential for frequency and 'hum' effects. The single decibel value noise rating level criteria 34 dB LA_r,Tr may not describe and assess any tonal and hum issues.
- 10.8. The commitment to produce a CoCP (Schedule 1, Part 3, Requirement 17 of the draft DCO), that must be approved by relevant planning authority (including NNDC) prior to the commencement of works is an appropriate control measure for managing the potential effects of noise and vibration.
- 10.9. The management measures described to minimise impacts on noise and vibration during construction in the Outline CoCP (Document A8.5) measures are comprehensive and include scope for agreement with NNDC Environmental Health team in respect of hours of working, mitigation and methodology and complaint resolution.
- 10.10. Overall, there are therefore potential **negative** noise effects. With clarification from Ørsted as requested above, these negative effects should be capable of appropriate mitigation.

11. Air Quality

- 11.1. NNDC consider that, in respect of construction activities, the air quality impacts are unlikely to be an issue within North Norfolk so as long as the agreed Code of Construction Practice is followed. Air quality is therefore **neutral**.

12. Socio-economics

- 12.1. With the exception of reference to a now out of date 2012 NPPF, Section 10.4 of Volume 3, Chapter 10: Socio-economics has identified all appropriate plans and policies relevant to land use and recreation in the application area.
- 12.2. NNDC note that the primary and secondary data used to inform the baseline environment in Section 10.6 is high level in nature. NNDC commission an annual study of the [Economic Impact of Tourism](#) which is available to view on the Council's website for the year 2017. This should be used to inform the baseline environment.
- 12.3. In respect of the future baseline, NNDC note that, 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).
- 12.4. The conclusion at para 10.7.2.47 of Volume 3, Chapter 10: Socio-economics of the Environmental Statement which suggests that 'offshore wind farm developments generate very limited, or no negative impact on tourist and recreational users during the construction and O&M phases' is contested by NNDC.

- 12.5. The onshore cable route goes through some of the most attractive and sensitive parts of North Norfolk District and this area is a fundamental attraction to tourists throughout the year and host to visitor accommodation, facilities and attractions as well as their intrinsic natural value. In this regard, whilst NNDC believes the long-term impacts of the cable route on the tourism economy will be benign, the Council has very significant concerns that during the cable corridor construction phase there will be significant impacts on local tourism businesses in a very attractive and popular area of the North Norfolk Coast such that the construction works will have a significant impact on the income of tourism businesses in the Weybourne and Kelling area, which needs greater recognition by Ørsted.
- 12.6. In respect of the potential impacts identified in Section 10.11 of Volume 3, Chapter 10: Socio-economics of the Environmental Statement, NNDC consider the conclusions within Section 10.11 in relation to impact on tourism appear to have a very narrow focus and seek to diminish the potential impacts to negligible. Whilst impacts during construction are time limited, in the worst-case scenario they could extend to 8 years and, with a HVAC solution could include extended periods of beach closure at Weybourne given the number of cables.
- 12.7. Para 10.11.1.132 concludes that ‘No socio-economic and tourism monitoring to test the predictions made within the construction phase is considered necessary’. NNDC disagree with this approach and consider that Ørsted should be required to better understand and quantify the impact and to consider appropriate mitigation for tourism facilities adversely affected by the proposal during the construction phase, particularly in the immediate areas of Weybourne and Kelling where there is a concentration of tourism businesses in a highly environmentally constrained area with limited highway access.

- 12.8. NNDC consider that the potential impacts during the construction phase on the local tourism economy in North Norfolk have been significantly downplayed within the EIA submission. Separate mitigation is suggested to be secured to quantify and understand the impact of construction on tourism spend within North Norfolk.
- 12.9. Accordingly, while the long-term impact on tourism is likely to be **neutral**, there is potential for significant short-term **negative** impact.
- 12.10. NNDC consider that the commitment to produce a skills and employment plan (Schedule 1, Part 3, Requirement 22 of the draft DCO) is unlikely to benefit North Norfolk and seems tailored towards the ports to be used during O&M phase.

13. Statement of Common Ground

- 13.1. At the time of submission of this Local Impact Report (Deadline 1 – 07 Nov 2018), NNDC and Ørsted have been working together to produce a Statement of Common Ground.
- 13.2. Whilst this document is substantially completed and there are many areas of agreement, some further revisions are being made and some amendments are being tabled by Ørsted in order to seek to address issues identified.
- 13.3. As such, whilst it is not possible to submit a completed/finalised Statement of Common Ground in time to meet Deadline 1, both Ørsted and NNDC are fully committed to progressing drafting of this document with expectation of a substantially completed draft ready for submission by Deadline 2.

- 13.4. This will ensure that well ahead of the Issues Specific Hearings in December 2018, there will be a clear understanding of the areas of agreement and areas of disagreement to enable focussed discussion at the Issue Specific Hearings.
- 13.5. Ørsted have confirmed that they will submit the latest iteration of the draft/interim Statement of Common Ground to the Planning Inspectorate.
- 13.6. Many of the issues raised within the draft/interim Statement of Common Ground are captured within this Local Impact Report.

14. Conclusions

- 14.1. NNDC welcome and support the principle of renewable energy development to help meet the challenges of climate change and support the development of stronger and resilient electricity networks capable of reducing reliance on fossil fuels and to reduce the need to import electricity from outside of UK waters.
- 14.2. The proposed Hornsea Project Three project has the potential to result in a number of impacts across North Norfolk District and it is important that those adverse impacts are reduced as much as possible and appropriate mitigation provided.
- 14.3. Whilst many of the impacts are or can be made acceptable through the drafting of any Development Consent Order, there are a number of key project design decisions which will have a significant bearing on the overall impact of the project including the choice between HVAC or HVDC transmission.
- 14.4. Having considered all of the available evidence, NNDC would favour the use of HVDC for the many reasons outlined in this Local Impact Report including

the reduced the number of cables needed, potential reduced construction duration (and associated benefits to tourism and agriculture economy) as well as the benefit of not having to construct a booster station within the District. These are all factors which weigh heavily in favour of restricting any Development Consent Order to HVDC only.

- 14.5. Other key design choices include the method of bringing cables onshore at Weybourne. The available evidence points towards the use of Horizontal Directional Drilling rather than Open-Cut trenching for the reasons set out in this report.
- 14.6. Notwithstanding the above issues, NNDC will continue to work with Ørsted to produce a final Statement of Common Ground setting out all areas of agreement, areas under discussion and areas not agreed which will inform the Issues Specific Hearings.
- 14.7. Finally, North Norfolk will work with Ørsted to ensure that the maximum amount of community benefits can be secured both through the Development Consent Order process and through individual negotiation for the wider benefit of North Norfolk.