

Hornsea Project Three
Offshore Wind Farm



Hornsea Project Three Offshore Wind Farm

Applicant's Comments to North Norfolk District Council Local
Impact Report submitted at Deadline 1

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Front cover picture: Kite surfer near a UK offshore wind farm © Ørsted Hornsea Project Three (UK) Ltd., 2018.

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1. Introduction

- 1.1 North Norfolk District Council (NNDC) have submitted a Local Impact Report at Deadline 1 (REP1-062) providing a summary of matters of relevance to Norfolk as well as matters which remain under discussion between the parties, such as landfall construction methodology; mitigation measures for Pink Footed Geese; maintenance of the landscape mitigation planting during the operation and maintenance phase; management of Public Rights of Way during the construction phase; noise impacts from the onshore HVAC booster station; and impacts during the construction phase on the local tourism economy in North Norfolk..

2. North Norfolk District Council Local Impact Report (REP1-062)

Summary Response

- 2.1 The Applicant has responded to each of the points raised by NNDC below, and would refer to the Statement of Common Ground between the Applicant and NNDC submitted at Deadline 2 which provides a summary of the matters agreed, and those which remain under discussion. The Applicant will continue to engage with NNDC in respect to the matters outstanding with a view to addressing outstanding concerns.

Full Response

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<p>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).</p> <p>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.</p> <p>1.3. In responding to this NSIP application, NNDC has drawn from, amongst other things, internal expertise in relation to:</p> <ul style="list-style-type: none"> • Coastal Processes • Landscape and Visual Impacts • Ecology • Environmental Protection • Economic Development <p>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.</p>	<p>The Applicant has responded on the topics covered within the Local Impact Report under the respective headings below.</p>
<p>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.</p> <p>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.</p> <p>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).</p> <p>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</p>	<p>Noted.</p>

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<p>Sheringham with Norwich.</p> <p>2.5. The District has a strongly rural character with agriculture, in particular arable farmland, comprising by far the largest component of land use.</p> <p>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.</p> <p>2.7. There are many positive aspects of the North Norfolk environment, such as:</p> <ul style="list-style-type: none"> • 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. <p>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.</p> <p>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:</p> <p>"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."</p>	
<p>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.</p> <p>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,</p>	<p>The Applicant notes NNDC's support of the principle of offshore renewable energy subject to the detailed comments responded to below. Design considerations are discussed in respect to landscape and visual resources matters below.</p>

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<p>amongst other things, careful siting and design.</p> <p>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.</p>	
<p>4.1. The final chosen method of transmission of electricity to the onshore gird 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.</p> <p>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.</p> <p>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.</p> <p>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).</p> <p>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.</p> <p>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.</p> <p>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</p> <p>4.8. Accordingly, it would be positive for Ørsted to choose a HVDC transmission system, and negative to choose a HVAC transmission system.</p>	<p>The Applicant would refer to Appendix 22: Transmission Technology (HVDC/HVAC) Briefing Note to the Applicant's response to Deadline 1 (REP1-164). This Appendix sets out the need to maintain both HVDC and HVAC within the project envelope as well as the relative impacts which will be experienced under each scenario across the project as a whole.</p>
<p>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.</p> <p>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</p>	<p>The Applicant notes the comments from NNDC on paragraphs 5.1 to 5.4. In respect to 5.3, the Applicant would refer to the Applicant's response to the ExA's First Written Questions Q1.1.5 and Q1.9.2 which relates to the construction methodology proposed at landfall.</p> <p>The Applicant highlights that an assessment is presented within the Application of potential impacts on coastal processes at the landfall (Volume 2, Chapter 1: Marine Processes of the</p>

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<p>shingle bank.</p> <p>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:</p> <p>'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...'</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Environmental Statement (APP-061) and Volume 5, annex 1.1: Marine Processes Technical Report of the Environmental Statement (APP-101)) This assessment considers the maximum design scenario, in terms of the method of installation at the landfall. This involves assessment of both open cut installation and HDD (as the potential impacts from each at the landfall / nearshore are subtly different). The assessment concludes an effect of minor adverse significance on nearshore coastal processes, based on this consideration of all installation options included in the project envelope.</p> <p>The Applicant notes the comments made by NNDC in paragraph 5.5 in relation to mechanical shingle movement at this location. If this comment from NNDC refers to some form of historical beach works at this location, then the Applicant will require some further information regarding these works in order to fully consider the concern raised. In order to comment on whether other historical works represent a suitable analogue for the proposed activities, more information is required about the actual location of the historical works, the area and depth of shingle affected, the duration of the works, and the methodology/equipment used. The Applicant would also require information about the nature of the subsequently observed changes to the beach/shingle bank, the sources of information used to identify the change, and why the changes are considered to be 'losses' caused by 'weakening [of] the bank structure' (rather than natural variability in the beach profile). It should also be confirmed whether the loss is considered to be ongoing, or if the effect has since stabilised or recovered.</p> <p>Excavation of the intertidal shingle bank and consolidated cliff material may lead to localised differences in strength/weakness in the cliff material at locations where cabling is installed. However, due to the localised nature of the trenching works, the cross-shore extent of areas of relative weakness will be relatively small (in the order of a few metres). The affected areas will be backfilled following appropriate design guidelines that will minimise any relative weakening of the shingle beach and cliff material whilst also not presenting a hard point of higher erosion resistance. It is in the interests of the engineering design to minimise the potential for localised erosion of the ground into or around which the cable is trenching.</p> <p>As set out in Schedule 1, Part 3, Requirement 17(1) of the draft DCO (Version 1, as submitted for Deadline 1 (REP1-133)) a Code of Construction Practice (CoCP) will be submitted to the relevant planning authority and must be approved by them in consultation with the Environment Agency prior to the commencement of construction. This will detail the appropriate reinstatement measures of the to be implemented once cables are installed, taking into account the potential for coastal erosion and foreshore lowering over the lifetime of the infrastructure</p> <p>The Applicant highlights that an assessment is presented in the Application of the potential impacts at the landfall / nearshore during the operational phase of the project (i.e. longer term impacts beyond the construction phase). The Applicant notes NNDC's comment with regards to trends of coastal erosion and foreshore lowering. The Applicant refers to Ex.A to Volume 2,</p>

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	<p>Chapter 1: Marine Processes of the Environmental Statement (APP-061) and Volume 5, annex 1.1: Marine Processes Technical Report of the Environmental Statement (APP-101). These documents include an assessment of changes to beach morphology at the nearshore area (drawing on the analysis of recent and historic beach monitoring data (including LiDAR) from 1994 to 2014. The understanding of beach dynamics at the landfall (as derived from this analysis) will feed into the detailed engineering design, to minimise the risk of cable exposure.</p> <p>5.6, 5.8 The Applicant has addressed issues relating to the use of HDD or open cut at the landfall location and the potential impacts on beach access in Annex 10 of the Applicant's Comments on Relevant Representations [REP1-131] submitted at Deadline 1, as well as in the Applicant's response to the ExA's First Written Questions Q1.1.5 and Q1.9.3 which address matters specific to the Norfolk Coast Path.</p> <p>5.7 The Applicant notes the comments made by NNDC, however, the detailed assessments presented in Volume 2, Chapter 1: Marine Processes of the Environmental Statement [APP-061] with respect to these potential impacts concluded that the significance of the effect from both open cut and HDD cable installation at the landfall was not significant in EIA terms. The Applicant has presented proposals for PRoW diversions to the Norfolk National Trails Partnership and received initial feedback that the outline proposals are appropriate, and that further details can be decided during the detailed design stage. The Applicant will continue to engage with NNDC in respect to the management of Public Right of Ways, particularly the Norfolk Coast Path, as reported within the Statement of Common Ground between Orsted and North Norfolk District Council submitted at Deadline 2.</p>
<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>6.1 - 6.4 Noted.</p> <p>6.5 The Applicant has clarified their position on Pink-footed Goose mitigation in the RSPB SoCG submitted at Deadline 2, and considers it appropriate to submit a Pink-footed Goose mitigation plan in the 12 months prior to commencement, as noted in the outline CoCP [REP1-142]. As NNDC would be an approver for the CoCP as a whole, it would also be an approver for the Pink-footed goose mitigation plan which would form an annex to the draft final CoCP. The mitigation plan is likely to include a decision tree process in line with adaptive management principles, which will determine triggers for appropriate levels of mitigation (i.e. ECoW watching brief, toolbox talks for construction teams, restricting more intrusive construction works in certain locations). It is not appropriate to deliver further detail pre-consent as factors such as crop regime, construction timelines and construction processes, all of which determine the mitigation proposed, will be confirmed post-consent.</p> <p>6.6 The Applicant would refer to the Statement of Common Ground with NNDC submitted at Deadline 2 which responds to each of these points. The Applicant will continue to engage with NNDC to discuss matters relating to mitigation and replanting to be provided post-construction.</p>

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<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>6.14. With respect to the mitigation of the lost bat roost potential</p>	<p>6.8 Noted.</p> <p>6.9 The management plans (Outline LMP and Outline EMP) secure mitigations. The outline EMP [REP1-147] specifies that replacement planting ‘will comprise a species-rich mix of native shallow-rooting hedgerow species typical of the area’, and therefore this commitment is secured. Further details of the mitigation planting, including species selection and planting densities will be provided in the final LMP to be developed in consultation with the relevant local authorities’ post-consent (Requirement 8 of the draft DCO). The final LMP will also include details of landscape planting maintenance to be approved by the relevant local authorities, including NNDC. The principles of this maintenance and management is set out in Section 5 of the Outline LMP (REP1-145). This has been agreed with North Norfolk District Council through the Statement of Common Ground which has been submitted at Deadline 2.</p> <p>6.7 and 6.10 The Applicant has committed to replace, and maintain for a period of 5 years, the hedgerows within the Order Limits which is sufficient to mitigate potential effects identified in Volume 3, Chapter 3: Ecology and Nature Conservation. However, it is recognised that in some locations, the management and/or provision of hedgerow planting along a wider strip (subject to landowner agreement) would be beneficial in improving the receiving habitat structure as well as connectively and integration into the surrounding landscape. The management measures for hedgerows relied upon for mitigation are described in Section 5.4 of the outline LMP [APP-181]. The management of the hedgerows outside of the Order Limits will be the responsibility of the landowner, although it is noted continued management and maintenance is not strictly required for the purpose of mitigating the impacts of Hornsea Three.</p> <p>6.11 The species used in hedgerow replacement/enhancement planting will include acer campestre (field maple), cornus sanguinea (common dogwood), corylus avellana (hazel), crataegus monogyna (hawthorn), ilex aquifolium (holly), malus sylvestris (crab apple), prunus spinosa (blackthorn/sloe), rosa canina (dog rose), as shown in Appendix A of the Outline LMP (REP1-145). Further details of the mitigation planting, including species selection and planting densities will be provided in the final LMP to be developed in consultation with the relevant local authorities’ post-consent (Requirement 8 of the draft DCO). The final LMP will also include details of landscape planting maintenance to be approved by the relevant local authorities, including NNDC. This has been agreed with North Norfolk District Council through the Statement of Common Ground which has been submitted at Deadline 2.</p> <p>6.12 – 6.13 Noted.</p> <p>6.14 As set out in paragraph 3.11.1.105 of Volume 3, Chapter 3: Ecology and Nature Conservation and the Outline CoCP various measures will minimise the impact on all bat species, including the use of directional lighting, where lighting is required, to minimise light spillage onto adjacent areas of retained habitat of value to bats. Where practicable, consideration will be given to installing long-lasting woodcrete bat roost boxes in suitable locations on</p>

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<p>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.</p> <p>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.</p>	<p>retained mature trees within the Hornsea Three onshore cable corridor to enhance the potential value of the site to roosting bats. To provide clarity, paragraph 9.2.1.5 of the Outline EMP (APP-180) has been updated as follows (new text shown in underline):</p> <p><i>"Paragraph 9.2.1.5 The LPAs and Natural England will be invited to attend regular meetings (typically monthly where active works are about to or are occurring) during the pre-construction and construction phases. The need for and regularity of meetings will be held as requested or required by the LPAs or Natural England during the operational phase. Meetings will be held so as to enable the ECoW, Site Manager or Undertaker to report on progress and the effectiveness of the implemented EMP and to provide an opportunity to discuss measures considered necessary to ensure adherence to the requirements of the Plan and relevant legislation. <u>trees to provide immediate potential roost sites as mitigation for lost tree holes of potential value to roosting bats. Where practicable, consideration will be given to installing long-lasting woodcrete bat roost boxes in suitable locations on retained mature trees within the Hornsea Three onshore cable corridor to enhance the potential value of the site to roosting bats.</u>"</i> This matter has now been agreed with North Norfolk District Council through the Statement of Common Ground which has been submitted at Deadline 2.</p> <p>6.15 Noted.</p>
<p>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.</p> <p>7.2. However, in respect of relevant Local Policy and material planning considerations, in 2018 NNDC commissioned two new studies:</p> <p>i) revised Landscape Character Assessment; and</p> <p>ii) a new Landscape Sensitivity Assessment (with particularly reference to renewable energy and low carbon development).</p> <p>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.</p> <p>7.4. NNDC consider that the baseline environment needs to take account of these new resources.</p> <p>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).</p> <p>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.</p>	<p>7.1 The Applicant notes NNDC's confirmation that all appropriate plans and policies at the national level relevant to landscape and visual resources have been identified.</p> <p>7.2 -7.4 In respect to local planning policy, the Applicant would note that the revised Landscape Character Assessment and the new Landscape Sensitivity Study identified by NNDC are emerging policy, and have not yet been consulted on; as such they do not form a material planning consideration and have not been included in the baseline at this stage. Instead, Volume 3, Chapter 4: Landscape and Visual Resources chapter of the Environmental Statement (APP-076) refers to the baseline described in NNDC's 2009 Landscape Character Assessment Supplementary Planning Document; which is considered to provide an appropriate baseline for the assessment of landscape effects.</p> <p>7.5 - 7.7 Noted.</p> <p>7.8 In respect to the landscape planting, the Applicant would note that indicative landscape planting proposed at the onshore HVAC booster station, including the proposed species mix and specification, are shown in Appendix A of the Outline LMP (REP1-145). As noted by NNDC in 7.14, further details of the mitigation planting, including species selection and planting densities will be provided in the final LMP to be developed in consultation with the relevant local authorities' post-consent (Requirement 8 of the draft DCO). The final LMP will also include details of woodland management and landscape planting maintenance to be approved by the relevant local authorities, including NNDC. The principles of this maintenance and management is set out in Section 5 of the</p>

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<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>7.11. NNDC support the principle of early implementation of sections of mitigation planting in relation to the booster station.</p> <p>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</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>Outline LMP (REP1-145). This matter has now been agreed with North Norfolk District Council through the Statement of Common Ground which has been submitted at Deadline 2.</p> <p>7.9 Please refer to the response to 6.11 above.</p> <p>7.10 -7.11 – Noted.</p> <p>7.12 and 7.13 As noted in the response to point 6.11, further details of the mitigation planting, including species selection and planting densities will be provided in the final LMP to be developed in consultation with the relevant local authorities' post-consent (Requirement 8 of the draft DCO). The final LMP will also include details of landscape planting maintenance to be approved by the relevant local authorities, including NNDC. This has been agreed with North Norfolk District Council through the Statement of Common Ground which has been submitted at Deadline 2.</p> <p>7.14 – Noted.</p> <p>7.15 The Applicant would refer to the Statement of Common Ground between North Norfolk District Council and Hornsea Project Three submitted at Deadline 2, which confirms that NNDC will be consulted on external lighting at the onshore HVAC booster station and that details will be submitted to and approved by NNDC prior to commencement secured under Requirement 7 of the dDCO.</p> <p>7.16 and 7.17 - Replacement of failed plants for a period of five years following mitigation planting, as stated on the Outline LMP paragraph 5.3.11 (REP1-145), is common practice and sufficient to ensure successful woodland establishment. The Applicant would note that the chance of plant failures after 5 years would be minimised through the management and maintenance regimes identified in the Outline LMP (as noted above), such that it would be unnecessary to extend to ten years. The Applicant will continue to discuss matters regarding the Outline LMP, particularly plant replacement in the event of failure and woodland management, with North Norfolk District Council in order to close out the queries raised.</p> <p>7.18 The Applicant would refer to the response to 6.9 and 6.10 above.</p> <p>7.19 Noted.</p>

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<p>planting.</p> <p>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.</p> <p>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.</p> <p>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.</p>	
<p>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).</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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).</p> <p>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.</p> <p>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</p>	<p>8.1 The Applicant would direct the Examining Authority to Appendix 21: Revised Planning Policy Framework (REP1-170) of the Applicant's response to Deadline I, which reviews the revised NPPF and updated Planning Practice Guidance.</p> <p>8.2 The Applicant notes the response of North Norfolk District Council regarding the characterisation of the baseline and the list of potential impacts identified in Volume 3, Chapter 6: Land Use and Recreation of the Environmental Statement (APP-078).</p> <p>8.3 – 8.5 - Noted.</p> <p>8.6 and 8.7 - With regards to ducting, the Applicant would direct the Examining Authority to the Applicant's Comments on the Relevant Representations submitted at Deadline I (Annex 10, REP1-131) and the Applicant's response to the Ex.A .First Written Questions Q1.1.6 and Q1.1.10 submitted at Deadline I (REP1-122) which sets out the Applicant's commitment to installing the cables in ducts and to install ducts for the second phase as part of the first phase of works should both phases be awarded a contract for Difference (or equivalent funding mechanism) in the same auction round.</p> <p>8.8 – 8.10 - The Applicant notes the responses of North Norfolk District Council regarding the potential effects on land use and recreation during the construction, operation and maintenance, and decommissioning of Hornsea Three. The Applicant would direct the Examining Authority to the Applicant's response to the Ex.A .First Written Questions Q1.1.6 and Q1.1.10 submitted at Deadline I (REP1-122) which sets out the Applicant's commitment to installing the cables in ducts and to install ducts for the second phase as part of the first phase of works should both phases be awarded a Contract for Difference (or equivalent funding mechanism) in the same auction round.</p> <p>8.11 The Applicant would direct the Examining Authority to Schedule 1, Part 3, Requirement 17 and 18 of the draft DCO (APP-027) which states a CoCP and CTMP will be submitted to and approved by the relevant planning authority prior to any phase of the works commencing. The CoCP and CTMP will be based in the principles of the Outline CoCP (APP-179/REP1-142) and Outline CTMP (APP-176/REP1-146). These final documents will</p>

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<p>out of agricultural production.</p> <p>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.</p> <p>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).</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>provide detailed management measures based on the principles from the outline documents (including a Soil Management Strategy). This matter has now been agreed through the Statement of Common Ground between both parties, submitted at Deadline 2.</p> <p>8.12 and 8.13 - Paragraph 6.8.1.7 of the outline CoCP has been updated as part of the Applicant's submission to Deadline 1 [REP1-142] to include the text "<i>These measures, along with timeframes for reinstatement, will be set out in a PRoW Management Plan to be approved by Norfolk County Council</i>". Furthermore, paragraph 6.8.1.22 of REP1-142 states: <i>"6.8.1.22 The Undertaker recognises the sensitive nature and high usage of the beach and the coastal footpath. In the event that access along the beach is to be restricted or the coastal path needs to be temporarily diverted, the Undertaker or principal contractor for the landfall works will submit details within the PRoW Management Plan to be provided as an appendix to the final CoCP and approved by North Norfolk District Council and Norfolk County Council as the relevant planning authorities."</i></p> <p>This secures the commitment to provide a PRoW management plan through Requirement 17 of the draft DCO.</p> <p>8.14 – Noted.</p>
<p>9.1. In respect of Traffic and Transport matters within the</p>	<p>Noted. The points raised within this LIR are captured within the</p>

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<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Statement of Common Ground between North Norfolk District Council and Hornsea Project Three which has been submitted at Deadline 2.</p>
<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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 LAr,Tr may not describe and assess any tonal and hum issues.</p> <p>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.</p> <p>10.7. In respect of embedded measures identified in Section 8.11 of</p>	<p>10.1 -10.4 - The Applicant notes and welcomes the comments from North Norfolk District Council on the plans and polices used in the assessment, characterisation of the baseline (including baseline surveys) and the assessment methodology.</p> <p>10.5 - The Applicant notes that the rating level criteria 34 dB LAr,Tr relates to the onshore HVDC converter/HVAC substation rather than the onshore HVAC booster station. The onshore HVAC booster station, with its slightly quieter background noise level, would have a rating level criteria of 30 dB LAr,Tr to ensure that impacts are no greater than minor. This would include a 'rating penalty' of up to 6 dB (following BS 4142:2014) if the operational site noise as perceived at the noise and vibration sensitive receptor is tonal. As such, the assessment demonstrated that the onshore HVAC booster station would not generate noise levels at surrounding noise sensitive receptors which would require additional mitigation beyond those measures designed-in to the Hornsea Three as identified in Table 8.21 of Volume 3, Chapter 8: Noise and Vibration (APP-080).</p> <p>10.6 - Measurement of operational noise imissions would form part of the commissioning tests, to ensure the onshore HVAC booster station operates in accordance with the noise assumptions used in the operational noise model (Volume 6, Annex 8.3: Operational Noise Model Input of the Environmental Statement (APP-169).</p> <p>10.7 - The Applicant notes and welcomes the comments from North Norfolk District Council on the use of Best Practicable Means measures and construction management measures. With regards to the operation design criteria, see the Applicant's response above.</p>

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<p>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 LAr,Tr may not describe and assess any tonal and hum issues.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>10.8 and 10.9 The Applicant notes and welcomes the comments from North Norfolk District Council on the management measures within the Outline CoCP (APP-179/REP1-142) and the Applicant's commitment to produce a CoCP that must be approved by the relevant planning authority.</p> <p>10.10. Noted.</p>
<p>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.</p>	<p>Noted.</p>
<p>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.</p> <p>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.</p> <p>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).</p> <p>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.</p>	<p>12.1 - The Applicant would direct the Examining Authority to Appendix 21: Revised Planning Policy Framework (REP1-170) of the Applicant's response to Deadline 1, which reviews the revised NPPF and updated Planning Practice Guidance.</p> <p>12.2 - With regard to compiling the baseline, the Applicant has drawn on data for tourism volume and value from Visit Britain (including the GB Tourism Survey, GB Day Visitor Survey, International Passenger Survey) in order to ensure direct comparability with the other districts included in the Local Study Area. The Applicant is aware of NNDC's local tourism impact reports which provide more up to date information than used in the baseline and indicates the growth in the volume and value of tourism in North Norfolk. However, the Applicant would note that the onshore cable corridor is limited to a relatively small part of NNDC as a whole, and thus has the potential to impact a small proportion of its visitor economy. As such, the Applicant considers that the updated information would not affect the outcomes and conclusions of the assessment as presented within Volume 3, Chapter 10: Socio-Economics of the Environmental Statement (APP-082).</p>

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<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>12.9. Accordingly, while the long-term impact on tourism is likely to be neutral, there is potential for significant short-term negative impact.</p> <p>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.</p>	<p>12.3, 12.4 - The conclusions presented in paragraph 10.7.2.47 of Volume 3, Chapter 10: Socio-economics of the Environmental Statement (APP-082), are an overall conclusion based on the published evidence presented earlier in the chapter, looking across different phases, scales and location of development. The evidence suggests that whilst offshore wind farm development may potentially impact negatively on some visitors and users of recreational resources, these are typically time limited and can often be mitigated through appropriate measures where necessary. This helps to ensure that the actual impacts on local visitor economies as a whole are very limited or neutral. Needless to say, the nature of the potential impacts are specific to the characteristics of the particular development.</p> <p>12.5 - Paragraph 10.11.1.113 of Volume 3, Chapter 10: Socio-economics of the Environmental Statement (APP-082) recognises the potential for impacts on visitors and local recreational users due to visual, noise, obstructions or disruptions as a consequence of the construction of the onshore cable corridor. The assessments of these particular impacts concludes that they will be mostly minor or negligible, allowing for appropriate mitigation measures and practices set out in the draft management plans and codes of conduct.</p> <p>While there are some disruptions identified to a number of important PRoW (the Peddars Way and Norfolk Coast Path National Trail), any disruptions would be short term and temporary in nature. Furthermore, as stated in paragraph 6.8.1.17 of the Outline CoCP (REP1-142): <i>"Following completion of construction activities for a given phase, all public access within the working area (PRoWs) will be returned to their original alignment (if appropriate) and/or reinstated with a standard commensurate to that existing prior to the commencement of construction works unless otherwise agreed with the local planning authority. As noted in paragraph 1.1.1.6 of the Outline CoCP, if construction is to be undertaken in two phases, the works in the first phase will be left in a safe state as agreed with relevant local authorities."</i> A condition survey of all affected routes will be undertaken during the pre-construction period to inform the reinstatement works.</p> <p>In the context of the tourism and recreation study area, the Applicant considers that Hornsea Three may result in a small level displacement of local tourism within the tourism and recreation study area if visitors choose to amend their routes during their visit. However, paragraphs 10.11.1.115 – 10.11.1.118 indicate that, drawing from results of chapter 4: Landscape and Visual Resources, chapter 8: Noise and Vibration, and chapter 7: Traffic and Transport, the extent to which the construction of Hornsea Three affects tourism will be limited. In light of the limited magnitude of effects on tourism and recreational resources (and associated economic value), visual and noise receptors, and limited disruptions to traffic and transport, the overall effect is expected to be of minor adverse significance, which is not significant in EIA terms.</p> <p>12.6 and 12.7 - With regard to the conclusions within section 10.11 of Volume 3, Chapter 10: Socio-economics of the</p>

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	<p>Environmental Statement (APP-082) in terms of tourism, it has been necessary to define an overall tourism and recreational study area, however the assessment has considered the main locations of visitor economy and recreational resources in conjunction with the onshore cable corridor and the phasing options. As noted above, the assessment has concluded that there could be the potential for a degree of displacement of visitors, however this is subject to uncertainty and may be accompanied by the attraction of other visitors to what is noted by NNDC as a very popular visitor area.</p> <p>12.8 and 12.9 - The assessment Volume 3, Chapter 10: Socio-economics of the Environmental Statement (APP-082) has not identified the need to monitor the use of specific visitor facilities based on the assessed effects during construction. In addition, the Applicant notes that it would be practically difficult to isolate the impact of the construction of the onshore cable corridor on localised visitor areas from other factors such as general economic, tourism and investment trends.</p> <p>12.10 - The Applicant notes that the skills and employment plan secured by Requirement 22 of the draft DCO (REP1-133), will seek to enhance the local economic and employment benefits which Norfolk can realise. However, it is important to note that the construction of the onshore cable corridor will result in additional expenditure associated with construction workers and project managers from outside the area on accommodation and hospitality services.</p>
<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>13.5. Ørsted have confirmed that they will submit the latest iteration of the draft/interim Statement of Common Ground to the Planning Inspectorate.</p> <p>13.6. Many of the issues raised within the draft/interim Statement of Common Ground are captured within this Local Impact Report.</p>	<p>The Applicant would refer to the Statement of Common Ground between North Norfolk District Council and Hornsea Project Three which has been submitted at Deadline 2.</p>
<p>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.</p>	<p>Noted. The Applicant has responded to each of the individual points detailed above.</p> <p>The Applicant would refer to the Statement of Common Ground between the Applicant and NNDC submitted at Deadline 2 which provides a summary of the matters agreed, and those which</p>

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<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>remain under discussion. The Applicant will continue to engage with NNDC in respect to the matters outstanding with a view to addressing outstanding concerns.</p>

