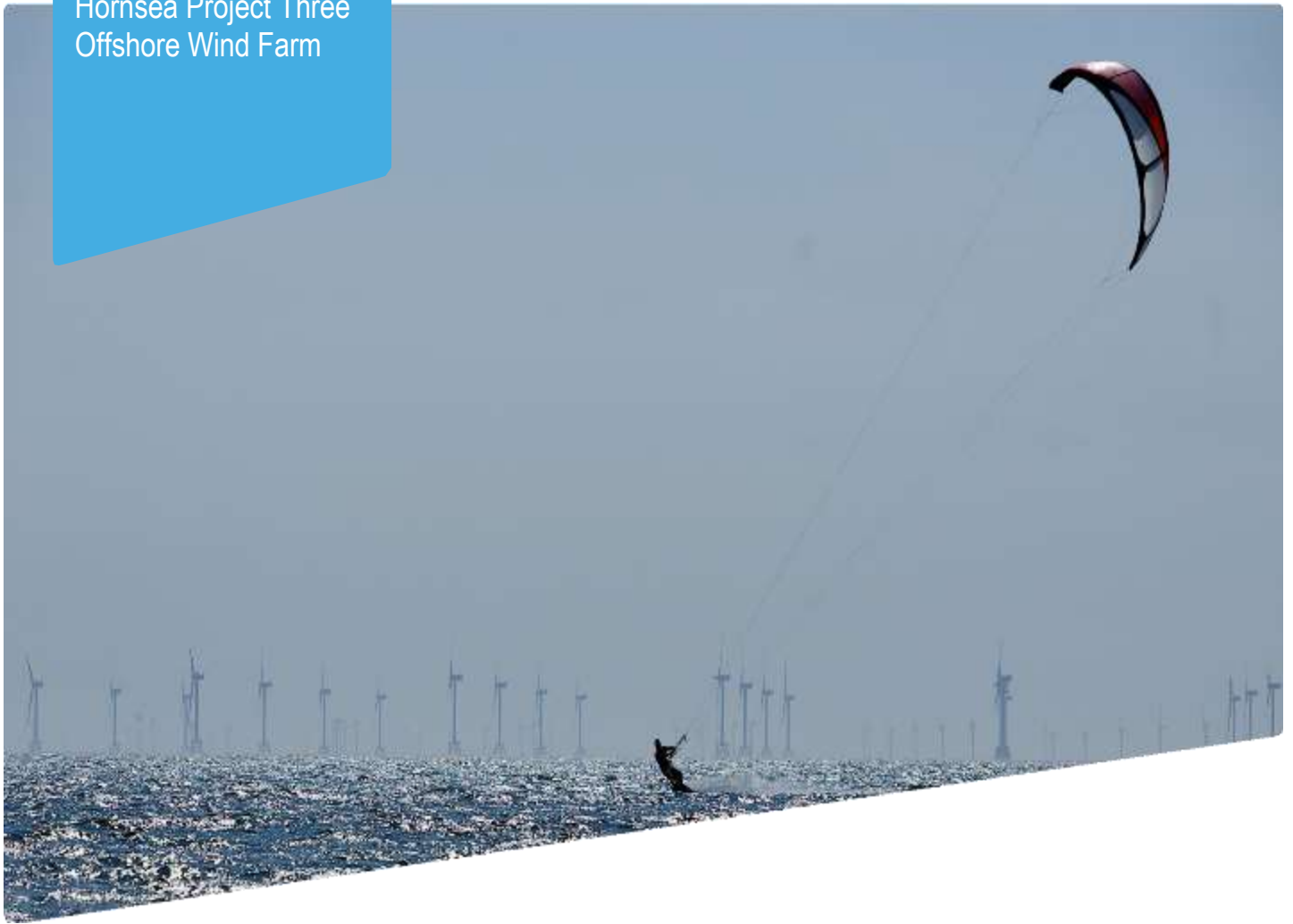


Hornsea Project Three  
Offshore Wind Farm



## Hornsea Project Three Offshore Wind Farm

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

Date: 21<sup>st</sup> November 2018

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**Table of Contents**

1. Introduction.....3

2. South Norfolk Council Local Impact Report (REP1-100) .....3

    Summary Response .....3

    Full Response .....4

## 1. Introduction

- 1.1 South Norfolk Council (SNC) have submitted a Local Impact Report at Deadline 1 (REP1-100) providing a summary of relevant planning policy, and planning history as well as matters which remain under discussion between the parties, such as Important Hedgerows, Trees and heritage impacts relating to Keswick Hall and its associated parklands.

## 2. South Norfolk Council Local Impact Report (REP1-100)

### Summary Response

- 2.1 The Applicant would refer to the Statement of Common Ground between the Applicant and SNC submitted at Deadline 1 (REP1-223) which provides a summary of the matters agreed, and those which remain under discussion. The Applicant will continue to engage with SNC in respect to the matters outstanding with a view to addressing outstanding concerns.

## Full Response

| South Norfolk Council Local Impact Report  | Applicant's Response   |
|--|--|
| <p>Introduction</p> <p>This Local Impact Report (LIR) has been prepared by South Norfolk Council in accordance with the advice and requirements set out in the Planning Act 2008 (as amended) as, 'a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area)'. In preparing this LIR the local authority has had regard to the DCLG's Guidance for the examination of applications for development consent (2015) and the Planning Inspectorate's Advice Note One, Local Impact Reports (2012).</p> <p>The LIR relates only to the onshore elements and identifies the most relevant policies and the main issues the Council has concerns over.</p>  | <p>Noted.</p>  |
| <p>Details of the proposal</p> <p>This project is for an offshore windfarm by Orsted (Danish Energy Company) which would generate 2,400 MW of electricity, which as stated by Orsted would meet the daily energy needs of over 2 million homes. The location of Hornsea Project Three is within the North Sea to the east of Hull. The grid connection for the generated electricity is Dunston in South Norfolk. There are two key components of the project within South Norfolk, the cable route and substation located at a site northwest of Mangreen Hall, adjacent the B1113 to the west and A47 to the north.</p> <p>The wind farm consists of 300 turbines off the coast of Hull and will make landfall at Weybourne, North Norfolk with a buried cable route between Weybourne and grid connection at Norwich Main National Grid Substation. The route will run through three Local Authorities North Norfolk, Broadland and South Norfolk.</p> <p>The cable corridor will be 80m in width, within which is a 60m permanent easement post installation.</p> <p>The substation/converter is to be located at a site northwest of Mangreen Hall, adjacent the B1113 to the west and A47 to the north. It will consist of a range of equipment for the delivery of power to national Grid such as transformers, reactors etc. and ancillary and supporting equipment. The main equipment will be housed within single or multiple buildings, in an open yard or a combination of the above. If multiple buildings are used the length and width of these buildings would be reduced proportionally to the number of buildings. The site area for all infrastructure is 149,302 sq. m.</p> <p>The detailed design and materials of the substation/converter does not form part of the application; however, the maximum design parameters have been provided. The scale of the building is dependent on the electricity current selected. The HVAC scenario: main buildings is 220m if a single building and if multiple buildings no more than 150m in length, maximum width 75m but with a reduced height of 15m. The HVDC scenario: 220m by 75m with a height of 25m, which is a significant increase upon the maximum parameters of the building provided under the PIER consultation.</p> | <p>Noted.</p> <p>The Applicant can confirm that the length of buildings proposed for HVAC and HVDC transmission was amended between Preliminary Environmental Report ("PEIR") and the Application to allow a greater amount of equipment to be housed within buildings if required. The final parameters of scale for the onshore HVDC converter/HVAC substation will be approved by the relevant planning authority under Requirement 7 of the draft DCO (APP-027), which requires the Applicant to submit details including the layout, scale, finished ground levels, external appearance, materials, access and circulation areas, and timetables for the landscaping works at the HVDC converter/HVAC substation for approval by SNC prior to commencement of construction.</p> |

| South Norfolk Council Local Impact Report   | Applicant's Response  |
|---|---|
| <p><u>Relevant development proposals under consideration or granted permission but not commenced or completed</u></p> <p>Land at Honingham, adjacent to Easton</p> <p>Greater Norwich Food Enterprise Zone Local Development Order ref 20170052</p> <p>2014/2611 - Land North and South of Dereham Road, Easton.</p> <p>Outline planning for the erection of 890 dwellings; the creation of a village heart to feature an extended primary school, a new village hall, a retail store and areas of public open space; the relocation and increased capacity of the allotments; and associated infrastructure including public open space and highway works. Approved conditionally.</p> <p>2011/1804 – Land north of Hethersett Village Centre, Little Melton Road.,</p> <p>Outline planning for residential led mixed use development of 1196 dwellings and associated uses including Primary School, Local Services (up to 1,850 sq. mtrs (GIA) of A1, A2, A3, A4, A5, D1 &amp; B1 uses) comprising shops, small business units, community facilities/doctors' surgeries, sports pitches, recreational space, equipped areas of play and informal recreation spaces. Extension to Thickthorn Park and Ride including new dedicated slip road from A11. Approved conditionally</p> <p>2018/2326 – Land north of Hethersett Village Centre, Little Melton Road.</p> <p>All reserved matters application for proposed residential development (phase A2) comprising 181 no. dwellings. Including 20% affordable housing and associated open space and infrastructure following 2011/1804. Pending consideration.</p> <p>The Greater Norwich Local Plan</p> <p>The Plan is presently in the Regulation 18 consultation stage. The current consultation runs to Friday 14 December, following an earlier Regulation 18 consultation (January – March 2018) and covers newly submitted sites, revisions to some sites already consulted on and small sites not previously covered. The sites have no status in planning terms as they have been submitted under the call for sites and the initial Regulation 18 stage, which is the first stages of the Local Plan process. The sites have been subject to a high-level desk-top assessment in the Housing and Economic Land Availability Assessment (HELAA). Sites identified as potentially suitable in the HELAA still need to be subject to a full site assessment before a draft Regulation 18 plan is consulted on in autumn 2019. This information has been included for the Examination Authority's information.</p> <p>A number of sites put forward as part of this process are potentially directly affected by the proposed cable route.</p> <p>Honingham Thorpe/Easton</p> <p>Proposed Development – Employment, as part of strategic mixed-use development consisting of commercial and residential areas, incorporating district centres composed of retail, community facilities, primary schools, open space, landscaping including wildlife corridors and countrypark/nature reserve</p> | <p>The Applicant would note that consideration to the following proposals has been given within Volume 4, Annex 5.2: Cumulative Effects Screening Matrix of the Environmental Statement (APP-097):</p> <ul style="list-style-type: none"> <li>• 2011/1804 (including subsequent reserved matter applications);</li> <li>• 2015/1594;</li> <li>• 20170052;</li> <li>• 2014/2611; and</li> <li>• 2011/1804/O.</li> </ul> <p>The Applicant would note that a number of development proposals relevant to the Greater Norwich Local Plan were taken into account as set out in the Applicant's response to Q1.9.1 of the ExA's First Written Questions submitted at Deadline 1 (REP1-122).</p> <p>The Applicant would also noted that, as set out in paragraph 2.2.1.1 of Volume 4, Annex 4.4 – Post-PEIR changes to Hornsea Project Three (Stages 8 - 9) (APP-095), the Applicant sought to avoid known planning applications and planning allocations or areas that are likely to be approved for new housing or road improvements where possible. This was done via monthly Planning Application Monitoring.</p> |

| South Norfolk Council Local Impact Report   | Applicant's Response |
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| <p>Site Area – 53.36ha<br/>Land north, north-east, south-east and west of Hetherset x 2<br/>Proposed Development – up to 3000 dwellings on c.111ha, commercial/ employment development, supporting infrastructure, open space and potential country park</p> <p>Site Area – 196.49ha and 118.19ha<br/>Location - Intwood Lane, Swardeston<br/>Proposed Development – Residential</p> <p>Site Area – 1.13ha<br/>Location - Little Melton Business Park x 2<br/>Proposed Development – Food-led business hub</p> <p>Site Area – 2.99ha and 10.59ha<br/>Relevant Planning history<br/>2011/1804 – Land north of Hetherset Village Centre, Little Melton Road.,<br/>Outline planning for residential led mixed use development of 1196 dwellings and associated uses including Primary School, Local Services (up to 1,850 sq. mtrs (GIA) of A1, A2, A3, A4, A5, D1 &amp; B1 uses) comprising shops, small business units, community facilities/doctors' surgeries, sports pitches, recreational space, equipped areas of play and informal recreation spaces. Extension to Thickthorn Park and Ride including new dedicated slip road from A11. Approved conditionally.</p> <p>2015/1059 – Land north of Hetherset Village Centre, Little Melton Road<br/>Reserved matters application following outline planning permission 2011/1804/O for road layout. Approved conditionally.</p> <p>2015/1594 – Phase A1-A Land north of Hetherset Village Centre, Little Melton Road<br/>Residential development of 95no dwellings with associated open space and infrastructure. Approved conditionally.</p> <p>2016/2230 - Land north of Hetherset Village Centre, Little Melton Road<br/>Reserved Matters following planning permission 2011/1804 (Mixed Use Development) - Structural Landscaping. Approved conditionally.</p> <p>2017/0151- Land north of Hetherset Village Centre, Little Melton Road<br/>Reserved matters following outline planning permission 2011/1804/O - proposed residential development (phase A1-B) comprising 91 dwellings including 20% affordable housing and associated open space and infrastructure. Approved conditionally.</p> <p>2017/1104 - Land north of Hetherset Village Centre, Little Melton Road<br/>Reserved Matters Application following 2011/1804/O for phase B1-B - appearance, layout, scale and landscaping for 107 dwellings. Approved Conditionally.</p> |                      |

| South Norfolk Council Local Impact Report   | Applicant's Response  |
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| <p>Relevant development plan policies, supplementary planning guidance etc</p> <p>The following policies are considered relevant to the consideration of this application (relevant extracts of each policy are attached as Appendix 1).</p> <p>Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS) adopted in March 2011, amendments adopted January 2014.</p> <p>Policy 1 : Addressing climate change and protecting environmental assets</p> <p>Policy 2 : Promoting good design</p> <p>South Norfolk Local Plan (SNLP)</p> <p>South Norfolk Local Plan Development Management Policies, adopted October 2015</p> <p>DM3.8 : Design Principles applying to all development</p> <p>DM3.13 : Amenity, noise, quality of life</p> <p>DM3.14 : Pollution, health and safety</p> <p>DM4.5 : Landscape Character Areas and River Valleys</p> <p>DM4.6 : Landscape Setting of Norwich</p> <p>DM4.8 : Protection of Trees and Hedgerows</p> <p>DM4.9 : Incorporating landscape into design</p> <p>DM4.10 : Heritage Assets</p>  | <p>The Applicant notes that in the Statement of Common Ground between the Applicant and South Norfolk Council (SNC) submitted at Deadline 1 (REP1-223), SNC considers that Volume 3, Chapter 4: Landscape and Visual Resources (APP-076), Chapter 5: Historic Environment (APP-077), Chapter 8: Noise and Vibration (APP-080) and Chapter 9: Air Quality (APP-081) of the Environmental Statement have identified all the appropriate plans and policies relevant to landscape and visual resources, historic environment, noise and vibration, and air quality in the application area and due regard has been given to them in the assessments. The Applicant would also note that the consideration of Policy DM4.8 is still under discussion with SNC.</p>  |
| <p>The relevant issues are considered to be as follows:</p>   |   |
| <p>Heritage issues arise from both the underground cabling and the installation of the substation. This includes impacts on conservation areas and listed buildings which should be assessed in relation to policy DM4.10 of the SNLP and section 12 of the NPPF.</p> <p>The undergrounding of cables will raise issues such as archaeology which is dealt with by other bodies. With regard to the above ground installation, the key heritage consideration is the impact of the HVDC converter/HVAC substation on heritage assets in very close proximity to its proposed siting.</p> <p>The Council is generally happy with the EIA assessing the character of the heritage assets using the matrices, although it is considered that the impact of the development on both the setting of Keswick Hall and the setting of the historic parkland should be considered to be a greater level of impact and of more significance in the EIA than currently attributed. This should be taken into account in any decision making, particularly with regard to the options between HVAC and HVDC substation, where the later would result in a significantly higher building, a greater degree of harm, and fewer possibility of mitigating that harm in terms of the design approach.</p> <p>It should be noted that Historic England Historic Environment Good Practice Advice in Planning Note 3: The setting of guidance on setting was revised and second edition published 22 December 2017. Of particular note with regard to the EIA approach and the</p> | <p>The Applicant notes that SNC advises that impacts relating to buried archaeology are dealt with by other bodies (primarily Norfolk County Council Environmental Services).</p> <p>The Applicant notes that SNC is generally happy with the EIA assessing the character of the heritage assets using the matrices, although it is considered that the impact of the development on both the setting of Keswick Hall and the setting of the historic parkland should be considered to be a greater level of impact and of more significance in the EIA than currently attributed.</p> <p>In terms of the designated asset, Keswick Hall, there is broad agreement between SNC and the Applicant in that there would be harm to the asset, the harm is less than substantial and that this harm should be weighed against the public benefits of the proposal.</p> <p>With respect to Keswick Hall and the attached undesignated parkland, the Applicant is in discussion with SNC and will provide a clarification note on the assessment of the parkland in the Applicant's response to Deadline 3.</p> |



| South Norfolk Council Local Impact Report  | Applicant's Response |
|--|----------------------|
| <p>difference between landscape assessment and assessment of heritage assets are paras 14-16.</p> <p>Keswick Hall is grade II listed with the attached designed parkland undesignated. The parkland is not a registered park and garden, nor is it on the Historic Environment Record, however, it is identified in the South Norfolk Local Plan as an historic park and garden. The park was designed by a nationally known architect Gilpin and described in Dallas, Last and Williamson (2013) as "Keswick Hall is important as one of the few landscapes designed by William Sawrey Gilpin (1762-1843) in the county (see also Wolterton and Gunton)". This book is referenced in the EIA Volume 6 – 5-1 – 1.6.2 under Keswick Hall. Keswick Hall park is also referred to in the Garden History Vol 22 No2. The picturesque (Winter 1994) pp175-196 – William Sawrey Gilpin (1762-1843): Picturesque Improver.</p> <p>Historic England Historic Environment Good Practice Advice in Planning Note 3 "The Setting of Heritage Assets" advises that "many heritage assets have settings that have been designed to enhance their presence and visual interest or to create experiences of drama or surprise. In these special circumstances, these designed settings may be regarded as heritage assets in their own right, for instance the designed landscape around a country house. Furthermore, they may, themselves, have a wider setting: a park may form the immediate surroundings of a great house, while having its own setting that includes lines-of-sight to more distant heritage assets or natural features beyond the park boundary."</p> <p>The Council would therefore consider that the impact on the parkland as a designed landscape garden of some significance requires a separate assessment as an undesignated heritage asset.</p> <p>If assessed separately, the sensitivity of the parkland according to Chapter 6 table 5.10 would have medium sensitivity as it is a designed landscaped by a nationally known landscape and relatively well preserved. The Council would suggest within this table the magnitude of impact would be considered moderate. Since an appreciation of the parkland would involve views through the parkland with the backdrop of open countryside, the building on the site would lead to "Change within the setting leading to some loss of significance of the asset." There would be significant change within the setting leading to a loss of significance, resulting according to the EIA assessment criteria to moderate adverse impact.</p> <p>In terms of Keswick Hall as a listed building the Council would agree with the sensitivity being medium, but would suggest that the magnitude of impact on its setting would be deemed to be moderate. The statement states that it would be Minor, since there would be no physical impact on the designated asset. However, views from the listed building across the parkland with a backdrop of open countryside are important to appreciating the original design of the house as being a country house within a designed parkland within open countryside. The new substation would be a large bulky and alien feature within this setting and the Council would therefore consider that according to table 5.11 the impact</p> |                      |

| South Norfolk Council Local Impact Report   | Applicant's Response   |
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| <p>would involve "change within the setting leading to some loss of significance of the asset"</p> <p>and can therefore result in a moderate magnitude of impact, and it would be the case here. The resulting impact would therefore be moderate adverse.</p> <p>The EIA states that the impact on Keswick Hall would not be considered significant in terms of an EIA assessment, however the Council consider that the adverse impact on the hall is of significance in determining the application, as it would also be in considering the setting of the historic park and garden. The historic building visualisations clearly show that a 25m high building will be very visible looking south across the parkland from the rear of the house and this would have a significant and harmful impact on the setting of the grade II listed Hall and the setting of the parkland. Taking into consideration paras 129, 132 and 134 of the NPPF and policy DM 4.10 of the Local Plan, this would be considered less than substantial harm since the assets are not directly physically affected, however, section 66 (1) of the Planning (listed building and conservation areas) Act 1990 would require that considerable importance and weight should still be accorded to the "desirability of preserving... the setting" of listed buildings when weighing this factor in the balance. Also, para 135 of the NPPF requires that "The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."</p> <p>In view of the above it is considered that the impact of the development on both the setting of Keswick Hall and the setting of the historic parkland should be considered to be a greater level of impact and of more significance in the EIA than currently attributed. Some of the degree of harm can be mitigated against through various measures such as having a building which is lower height, which would result in noticeably less harm if below or closer to the tree line rather than rising above it. Other mitigating measures can include further tree planting and a recessive colour for the building, which could for example be darker colours at lower levels where seen in the backdrop and below the treeline, and lighter colours where the building is seen in views above the treeline.</p> |  |
| <p>The key landscape and visual impacts will result from the laying of underground cabling in respect of the removal/loss of hedgerows, trees and the impact of the HVDC converter/HVAC substation on the landscape character and visual amenities of the area. The proposed substation is located within the B1 Tas Tributary Farmland Landscape Character Area. Policies DM4.5, DM4.6, DM4.8 and DM4.9 are relevant in the consideration of the proposal.</p> <p>Landscape and Visual Impact – The Council is satisfied that the work has been undertaken in accordance with the accepted industry guidance (GVLIA3). Whilst there are some points of detail that may merit further scrutiny/debate, which is often the case when judgement is involved overall, generally we concur with the</p>   | <p>The summary of the assessment presented in Volume 3, Chapter 4: Landscape and Visual Resources (APP-076) is noted.</p> <p>The submitted photomontages in Volume 6, Annex 4.5: Photograph Panels, Wirelines and Photomontages (APP-146) show an indicative design for the onshore HVDC converter/HVAC substation as noted in Volume 6, Annex 4.1; Landscape and Visual Impact Assessment Methodology paragraph 1.1.10.1 (APP-142). The indicative buildings have been illustrated in a dark green colour. However, under Requirement 7 of the draft DCO (APP-027), the Applicant is required to submit details including the layout, scale, finished ground levels, external appearance, materials, access and</p> |

| South Norfolk Council Local Impact Report   | Applicant's Response  |
|---|---|
| <p>findings. Landscape and visual impacts, although linked, are treated separately.</p> <p>For landscape impact, the greatest effect is on the site of the proposed sub-station; the LVIA concludes that there would be a significant adverse effect (major-moderate adverse) but that this would diminish outside the site where the effects would not be significant.</p> <p>With regards to the visual impact, the LVIA establishes that, from the representative viewpoints chosen, the most significant visual effects are from SS9 (Mangreen Lane) and SS 6 (Low Road). SS9 is considered along with other local routes (roads and Public Rights of Way) in a section that concludes that, on completion, the visual effects for users of PRoW would be significant (major-moderate adverse) but this would diminish as new planting matures so to be not significant. Whilst not from a PRoW itself, viewpoint SS9 illustrates the similar visual effect likely to be experienced from the nearby residential dwellings at Mangreen, particularly should the additional off-site planting indicated on figure 1.2 (Volume 6, Annex 6.6 – Residential Visual Amenity) not be realised (it is subject to landowner agreement).</p> <p>As the assessment work is limited to some degree by the fact that final form of the proposed sub-station is not known at this stage, the visualisations are based on a worst-case scenario. From these it is clear that full visual mitigation from planting will not be possible, especially if the structures are to the maximum heights modelled. It is clear that any reduction in the potential height parameters will be invaluable in mitigating the predicted adverse visual effects and as such the HVAC option, with its lower height requirements, is seen to be the best option insofar as the sub-station itself is concerned.</p> <p>The submitted photomontages demonstrate how the sub-station's potential visual effect is exacerbated by the fact that the enclosed elements are often viewed against the skyline. The representations illustrate the structures using a dark green finish, but an alternative approach may mitigate the effect more successfully.</p> | <p>circulation areas, and timetables for the landscaping works at the HVDC converter/HVAC substation for approval by SNC prior to commencement of construction. This will include details on the building colours and façade treatments so that SNC can agree those which are appropriate to the local context and to minimise landscape and visual impacts and impacts on other receptors including heritage assets.</p>   |
| <p>Existing hedgerows and trees - Assessments have been made of the hedgerows using a standard procedure, but these only consider whether a hedge is species-rich or species poor and whether its condition is favourable or unfavourable. Whilst reference is made to the Hedgerows Regulations, no assessment is made of each hedge as to its 'importance' as defined by criteria set out in the Regulations; in addition to species composition and condition, these also include other ecological considerations and historical and archaeological factors too. Our local plan policy DM4.8 presumes in favour of retention of important hedgerows unless the need for, and benefits of, a development clearly outweigh their loss.</p> <p>The Council understands that any section of hedgerow that has to be removed as part of the cabling will be replanted, which does lessen the concern about potential loss of 'important' hedgerows (especially if their status is solely because of an historic line). However, we need to be clear as to when replanting may not be</p>  | <p>The Applicant would refer to Appendix 38 to the Applicant's response at Deadline I [REP1-160] which demonstrates how the Applicant has had regard to all criteria for importance in the Hedgerow Regulations 1997. A plan showing the location of all hedgerows important for historical and archaeological criteria [REP1-152] was submitted at Deadline I, whilst all Important Hedgerows are shown on the Important Hedgerow plan [REP1-155] including all hedgerows present at the onshore HVDC converter/HVAC substation.</p> <p>All hedgerows which are removed during the construction phase of Hornsea Three will be replanted, with the exception of hedgerow 323a-b on Sheet 33 of the Important Hedgerow plan [REP1-155], which is across the HVDC converter/HVAC substation site. The additional landscape planting and hedgerow enhancement detailed in the outline LMP [REP1-145] is considered sufficient to mitigate the loss of this hedgerow in the case that this hedgerow is an unassessed</p> |

| South Norfolk Council Local Impact Report  | Applicant's Response   |
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| <p>the possible, or when the 'importance' of a hedgerow cannot be safeguarded.</p> <p>Whilst there has been consideration of many hedgerows along the cabling route, what does not appear to be available is an assessment of the existing hedgerow that currently crosses the site of the proposed sub-station. The removal of this will be permanent if the scheme proceeds, so we need to be clear of the hedge's status.</p> <p>There is limited assessment of the existing trees that are potentially affected by these proposals. Most obvious are the existing trees within the hedge that crosses the sub-station site, but there may also be specimens within the cable corridor route that will potentially be affected. Paragraph 4.1.1.1 explains that approximately 7.39km of existing hedgerows will be removed for construction purposes and that "some will include trees which will also be removed". Replanted hedgerows can achieve a useful degree of visual effect in a relatively short time, but there is no tree replanting proposed for the cable corridor.</p> <p>That information is unavailable at this time regarding the 'importance' (or otherwise) of the hedgerows and also that there is no assessment of the trees implicated in the scheme, makes it difficult to judge the scheme against policy DM4.8.</p> | <p>important hedge.</p> <p>The Applicant would refer to Appendix 4: Tree Plan to Deadline 2, which shows the location of all trees along the onshore cable corridor route and also the location of known veteran trees. These trees were identified as part of a bat roost potential ground survey, which involved an ecologist assessment of veteran age and features. Access for these surveys was granted for 90% of the route.</p> <p>Based on these surveys, the Applicant has identified 26 veteran trees within the Order Limits. Specifically, in South Norfolk there are 17 veteran trees within the Order Limits, of these the Applicant has committed to retaining the following:</p> <ul style="list-style-type: none"> <li>• one veteran tree through the use of HDD (Tree ref. BA1FT126);</li> <li>• one veteran tree through the use of HDD with ducting laydown (Tree ref. BA1FT2);</li> <li>• one veteran tree through the commitment at paragraph 6.5.1.14 of the Outline CoCP (REP1-142) to optimise the route of the haul road where HDD with haul road is proposed in order to avoid trees (Tree ref. BA1FT137);</li> <li>• one veteran tree due to its location on the boundary of the Order Limits (Tree ref. BA1FT164); and</li> <li>• four veteran trees located within the strategic landscaping areas of the onshore HVDC converter/HVAC substation (as set out in the Onshore Limits of Deviation Plan (APP-026) (Tree refs. BA1GT122, BA1GT120, BA1GT118, BA1GT114).</li> </ul> <p>Prior to construction commencing, all trees scheduled to be removed which have not previously been assessed due to lack of access will be inspected under the direction of the ECoW, and where identified, veteran trees will be retained where practicable. These commitments will be captured in an updated Outline EMP to be submitted at a later Examination Deadline.</p> <p>There is no provision to plant broadleaved tree species in the area above the cables as there is the potential for tree roots to distort or damage the ducts and cables. However, as stated in paragraph 4.1.1.3 of the outline LMP [REP1-155], where practicable, broadleaved native trees will be planted along hedgerows elsewhere in the enhancement corridor (100 m wide corridor that will contain the working cable corridor).</p> <p>The assessment of Hornsea Three's impact on trees and hedgerows has been undertaken on the worst case scenario, which is assuming that all trees and hedgerows not confirmed as HDD over will be removed, whereas Hornsea Three has made commitments to retain where possible, including optimising the location of the haul road [paragraph 2.2.7.5 of the outline EMP REP1-147] and specific measures for the Norfolk Coast AONB [REP1-167] and veteran trees in this response.</p> |

| South Norfolk Council Local Impact Report  | Applicant's Response   |
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|  | <p>The Applicant will continue discussions with SNC on the final EMP and LMP (under requirements 8 and 10 of the draft DCO).</p>   |
| <p>Landscape proposals - The proposals for planting in association with the substation are appropriate if the substation is built, but whether they are compatible with the published Landscape Strategy for the B1 Tas Tributary Farmland is open to debate. Whilst arguably the creation of woodland offers an opportunity to reduce the visual and aural impact of the A47 on the rural ambience of this area, it could also reduce the openness, which is contrary to policy DM4.6 in its consideration of the Norwich Southern Bypass Landscape Protection Zone.</p> <p>The submitted Outline Landscape Management Plan promotes enhancement planting within a wider 100m corridor along the route; also included within this is replacement tree planting for those felled as a result of the cable route. Any enhancement planting, however, is subject to landowner agreement. It would be desirable if a mechanism could be agreed by which such enhancements could be guaranteed.</p> <p>In view of the above it is considered that in landscape impact terms, the greatest effect is on the site of the proposed sub-station and this would be a significant adverse effect (major-moderate adverse) but that this would diminish outside the site where the effects would not be significant. With regards to the visual impact, the most significant visual effects are from Mangreen Lane and Low Road. Overall the EIA concludes that, on completion, the visual effects would diminish as new planting matures so to be not significant. However, the planting will take a long time to establish. It is also considered that some of the degree of harm can be mitigated against through various measures such as having a substation/converter which is lower height and use of recessive colour for the building.</p> <p>In respect of the impact of the cable route, in the absence of the full information in terms of the 'importance' of hedgerows under the Hedgerow Regulations and assessment of trees implicated in the scheme, it is not possible to conclude on the impacts of the cable route.</p> <p>Concern remains that the creation of woodland, whilst offering an opportunity to reduce the visual and aural impact of the A47 on the rural ambience of this area, its impact on the openness of the bypass protection zone could result in a significant adverse effect, which is contrary to policy DM4.6 in its consideration of the Norwich Southern Bypass Landscape Protection Zone.</p> | <p>In respect to impacts on the Norwich Southern Bypass Landscape Protection Zone, the Applicant will continue discussions with SNC on the final landscape mitigation planting post-consent (under Requirement 8 of the draft DCO (APP-027)) to ensure it reflects the mitigation necessary for the final design of the onshore HVDC converter/HVAC substation (to be approved under Requirement 7 of the draft DCO). This will enable the design to maintain the openness of the bypass protection zone as far as possible, as well as mitigate landscape and visual effects and promote good design. Furthermore, in response to ongoing engagement with SNC (as detailed within the Statement of Common Ground between South Norfolk Council and Hornsea Project Three (REP1-223)), the Applicant has sought to undertake baseline photography from vantage points along the A47. This work is due to be undertaken in late November 2018 (subject to access agreements with Highways England) and as such visualisations will be submitted to SNC and the Examination shortly. Discussions on this matter will be progressed through the SoCG process.</p> <p>In respect to the design of the HVDC converter/HVAC substation, under Requirement 7 of the draft DCO (APP-027), the Applicant is required to submit details including the layout, scale, finished ground levels, external appearance, materials, access and circulation areas, and timetables for the landscaping works at the HVDC converter/HVAC substation for approval by SNC prior to commencement of construction. Furthermore, as set out in the Applicant's response to SNC's Relevant Representation (see Annex 3 of the Applicant's Comments on Relevant Representations, REP1-131) and the Statement of Common Ground between the parties (REP1-223), the Applicant has committed to planting sections of the landscape planting at the commencement of works at the onshore HVDC converter/HVAC substation, which could be up to three years ahead of the planned completion of construction works, in order to maximise the screening provided during the construction phase and the early years of operation. This commitment has been secured through the updated Outline LMP (REP1-145).</p> <p>The Applicant submitted a clarification note on Important Hedgerows [REP1-160] as Appendix 38 at Deadline I, which demonstrates how the Applicant has had regard to all criteria for importance in the Hedgerow Regulations 1997. The assessment on the impacts of hedgerow removal have been undertaken on a worst-case scenario where all hedgerow within the DCO boundary (apart from where HDD is confirmed) is removed, and therefore the information presented in the Important Hedgerow plan [REP1-155] does not change the landscape, heritage or ecological assessments presented within the Environmental Statement.</p> |



| South Norfolk Council Local Impact Report   | Applicant's Response  |
|---|---|
|   | <p>Full details of replacement and enhancement planting are included in the outline EMP [REP1-147] and the outline LMP [REP1-145]. Further to this, the Applicant's approach to ecological enhancement has been agreed as appropriate by the Norfolk Wildlife Trust [REP1-227]. All sections of hedgerow along the onshore cable corridor will be replanted where they are removed.</p>   |
| <p>The key noise and pollution considerations are the impacts of the construction of and the operation of the proposal on the amenities on local residential in respect of air quality, water quality, noise and vibration, light pollution etc. Policy DM3.13 and DM3.14 are relevant to the consideration of the proposed development.</p> <p>The Council considers that the documentation would indicate that the proposal could take place (both the construction and operational phase) without an unacceptable impact on residents, if managed and operated appropriately.</p> <p>In view of the above, with regards to specified works to be undertaken issues relating to Control of Noise, Air Quality, Artificial Light, Waste Management, Pollution Prevention, Contamination Assessment and Mitigation and Working Hours are adequately covered by the Requirements in the Draft DCO. The Council is in general agreement with the Outline Code of Construction Practice but wishes to be assured that issues relating to hours of operation, siting of any standby generators, good practice procedures, prior notification of constructional noise, floodlighting, movement and storage of waste materials, public safety, dust control, emissions, telecommunication or television interference and decommissioning should be in place in the final document. The Council appreciates that the exact wording of the listed documentation/conditions will be subject to further discussion.</p> | <p>The Applicant would refer to the Statement of Common Ground between South Norfolk Council and Hornsea Project Three which notes that all matters regarding noise and air quality have been agreed between the parties. Furthermore, agreement that the detailed CoCP(s) to be approved under requirement 17 of the draft DCO (APP-027) will provide further details of hours of operation, siting of standby generators, good practice procedures, movements and storage of construction waste, measures associated with emissions (including dust), telecommunication interference, lighting and decommissioning has also been reached in accordance with SNC's relevant representation (RR-054).</p> |
| <p>In general, the Council is supportive of the project, recognising its importance in relation to the diversification of UK energy supplies and potential contribution to the national and local economy.</p> <p>The economic benefits in terms of investment and job creation are welcomed.</p>   | <p>Noted.</p>   |
| <p>With regards to the Draft Development Consent Order, the Council in general terms does not wish to raise any concerns, however as set out in our Statement of Common Ground and in response to the Examining Authority's questions there are issues and concerns relating to specific requirements/conditions. The Council wishes to reserve its position due to ongoing discussions with the applicant.</p>   | <p>Noted. The Applicant will continue to engage with South Norfolk Council in respect to the matters outstanding with a view to addressing outstanding concerns.</p>  |

