

From: [Geoff Lyon](#)
To: [Hornsea Project Three](#)
Subject: Deadline 4 - NNDC submission
Date: 15 January 2019 18:13:09
Attachments: [Deadline 4 - HP3 Further Examining Authority Questions for NNDC- Response 15 Jan 2018.pdf](#)

Dear Examining Authority,

Please find attached the Hornsea Project Three Deadline 4 response from North Norfolk District Council (INTERESTED PARTY REF: 20010749).

Please could you confirm receipt of this document.

Kind Regards

Geoff Lyon
Major Projects Manager

Geoff Lyon
Major Projects Manager
+441263 516226

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North Norfolk District Council
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Examining Question No.	Who needs to respond	Question	North Norfolk District Council Response
Q2.1.11	Applicant, Norfolk County Council (NCC), North Norfolk District Council (NNDC)	<p>In NNDC’s submission for Deadline 3 [REP3-103] a requirement is suggested to the effect that the method of electrical transmission within each phase of the authorised development shall be via HVDC unless there are clear and compelling technological reasons as to why HVDC transmission cannot be provided.</p> <p>Please can NNDC clarify whether it is proposing a decision making role under this requirement or the provision of information about a choice that has been made by the developer.</p> <p>If NNDC is seeking a decision making role, given the linear nature of the project how would NNDC intend to cooperate with other affected local planning authorities?</p> <p>Given the linear nature of the project it appears that the appropriate determining body</p>	<p>NNDC have sought to set out during the examination process that it is important for all parties not to lose sight of the fact that the purpose of Hornsea Project Three is to generate electricity and to transmit that electricity generated to the national grid network as effectively and efficiently as possible. Transmitting the maximum amount of electricity from the turbine field to the grid has to be a key driver for the project (otherwise what is the purpose of the project). Whilst NNDC have not seen any clear evidence from the applicant about the likely difference in actual power transmitted using HVAC or HVDC, it is the understanding of NNDC that HVDC is likely to be the most efficient of the two systems, particularly given the distance between the HP3 turbine field and grid connection point.</p> <p>The use of HVDC is therefore preferable not only in terms of maximising electrical transmission of renewable energy supplies from offshore turbines in helping decarbonise the UK’s energy sector but, taken as a whole, the use of HVDC also enables Ørsted to do so in the least harmful way, for the reasons set out in paragraph 2.2 of NNDC’s deadline 3 submission.</p> <p>The question for the ExA is therefore why would a DCO decision be made which gives freedom to the applicant to choose on cost/profit grounds the type of transmission system which transmits less</p>

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		<p>may be NCC. What is NCC's view on taking on such a role?</p> <p>If the Secretary of State finds that the degree of design flexibility sought by the Applicant is justified, would it then be reasonable to impose a second tier of in-principle decision making in relation to a major element of the Nationally Significant Infrastructure Project under the terms of a requirement?</p> <p>It appears to the ExA that the underlying concern being expressed by NNDC may be that there should be a clear and transparent explanation and justification for the ultimate choice of transmission system. If the Secretary of State were to conclude that this is a legitimate concern, does the Applicant have any alternative suggestions as to how to address this matter?</p>	<p>useable power to the grid and which has greater impacts, particularly if more effective alternatives such as HVDC exist. It is the position of NNDC that HVDC should be the preferable choice and only where there are clear and compelling technological reasons as to why HVDC transmission cannot be provided should HVAC transmission be used.</p> <p>However, it is not the intention of NNDC to seek to impose a second-tier decision-making role on the choice of transmission as the exercise of choice could be argued to go to the heart of any consent and a second-tier decision of this nature would not be appropriate for a Nationally Significant Infrastructure Project. Were it to do so, NNDC agree that the linear nature of the project would require agreement by all appropriate determining bodies (NNDC, Broadland and South Norfolk at District level and Norfolk County Council) and it is recognised that there is currently a divergence of opinion about the transmission preference near the project substation. NNDC have reservations about whether NCC would be better placed to make this choice and NNDC consider it incumbent on the ExA to set out its view on the transmission preference with any final DCO decision.</p> <p>NNDC recognise there are many factors that will affect transmission choices. It is nonetheless important to ensure, with a request from Ørsted for design flexibility, that there is a genuine</p>

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			<p>consideration of the preferable HVDC transmission system otherwise there is no genuine choice at all. It will be important for affected parties to understand how the final transmission choice has been made and this is why NNDC have requested that the applicant provides a clear and transparent explanation and justification for the ultimate choice of transmission system.</p> <p>NNDC would welcome a response from the applicant on this point.</p>
<p>Q2.7.3</p>	<p>Applicant, SNC and NNDC</p>	<p>The design parameters of the onshore HVDC converter/HVAC substation set out in table 3.63 of the ES [APP-058] include a proposed maximum height of 25m. The maximum height of the onshore booster station set out in table 3.62 of the ES [APP-058] would be 12.5m.</p> <p>From the information provided by the Applicant, what confidence can the ExA have that the proposed woodland planting would reach a height where it would achieve the levels of mitigation required in relation to both</p>	<p>NNDC have previously set out in its Local Impact Report [REP1-062] and Statement of Common Ground [REP2-011] that it supports the principle of early implementation of sections of mitigation planting in relation to the booster station.</p> <p>NNDC also set out that it 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.</p> <p>NNDC also commented that 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>

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		<p>landscape/visual impacts and the impacts upon the setting of heritage assets?</p> <p>Based on the minimum size of trees to be planted (set out in Appendix A of the first iteration of the Outline Landscape Management Plan [APP -181] for the HVDC converter/HVAC substation), the Applicant is requested to provide evidence of the expected rate of growth that would be achieved throughout the anticipated lifetime of the development for the woodland planting areas.</p>	<p>Whilst NNDC have made reference to generally slower growth rates in North Norfolk and has requested a 10-year replacement requirement for new planting, subject to the above and NNDC being party to approval of the final LMP, it is considered that the landscape impact of the booster station would, on balance, be acceptable. In any event it would not be required if HVDC transmission is utilised.</p>
Q2.9.3	Applicant, NCC and NNDC	<p>The Statement of Common Ground between the Applicant and NCC [REP1-232] states that discussions are continuing regarding management measures relating to the Norfolk Coast Path.</p> <p>Please provide an update on the discussions between the two parties in relation to the Norfolk Coast Path, including</p>	<p>Whilst NNDC recognise that NCC are the responsible authority for Public Rights of Way, NNDC would welcome involvement/consultation in the discharge of the Outline Code of Construction Practice so as to ensure there is full awareness of any proposed diversions, particularly in and around the landfall location. NNDC have a good working relationship with NCC and so would expect consultation between the parties and agreement of a final Outline Code of Construction Practice relating to PRow can be achieved.</p>

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		<p>any matter of disagreement which remains outstanding.</p> <p>The Applicant is requested to submit an up to date outline framework of measures that would be included within the Public Rights of Way (PRoW) Management Plan required by paragraph 6.8.1.22 of the Outline Code of Construction Practice [REP1-142].</p> <p>Paragraph 6.8.1.22 of the Outline Code of Construction Practice [REP1-142] states that the PRoW Management Plan would be submitted for the approval of both NNDC and NCC. Do the respective Council's agree that both parties should be responsible for its approval?</p>	
Q2.10.3	NNDC	<p>NNDC has raised concerns in its Local Impact Report [REP1-062] regarding the effect of the proposed construction works on tourism in the landfall area. These concerns were elaborated upon at ISH4. The Council has also submitted</p>	<p>NNDC have provided further evidence as to the value of tourism to the economy of North Norfolk (See Appendix A).</p> <p>However, it is hard to predict or quantify with any certainty the actual impacts of the construction of the proposed development upon visitor numbers</p>

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		<p>a report 'Economic Impacts of Tourism 2017 Results' [REP3-103].</p> <p>In terms of effects upon visitor numbers and associated tourism spending, could the Council quantify what the impacts of the construction of the proposed development might be (both in terms of the immediate area of Weybourne and the wider area)?</p> <p>What specific mitigation or monitoring measures are, in your view, necessary in order to mitigate any impact upon tourism?</p> <p>How would such measures be secured in the dDCO?</p> <p>Does the Council consider that there might also be positive effects, for example the use of accommodation and the purchase of food and drink by construction workers?</p>	<p>and associated tourism spending in terms of the immediate area of Weybourne and the wider area.</p> <p>Many mitigation measures are already in place in terms of Outline Code of Construction Practice and Outline Construction Traffic Management Plan which may help to reduce or manage adverse noise and disturbance impacts but these will not necessarily manage or mitigate for lost overnight stays or tourism spend in the local economy.</p> <p>Monitoring of various factors including visitor numbers, vacancy rates at hotel and B&B accommodation, tourism spend at shops and attractions may provide some evidence of impacts but these would be very hard to predict or quantify or attribute directly to the wind farm construction works and could be affected by various factors including the weather.</p> <p>NNDC recognise that there may be some positive effects, for example if construction workers stay in local accommodation and eat/drink in local hostelrys. However, if workers stay in local accommodation, particularly during the main tourism season then this can actually reduce overall spend in the economy, particularly for tourist attractions and for spin-off businesses who may rely on passing tourist trade to make an income which would not be derived from construction workers during the day. Reduction in</p>

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		<p>If so, what weight should be attached to such benefits?</p>	<p>accommodation supply and choice through use by construction workers can result in loss of future/repeat bookings by tourist visitors. Therefore, whilst some benefits may arise, these are likely to be limited in scope and duration and could have longer-term harmful impacts</p> <p>NNDC would welcome further discussion with the applicant as to possible measures to mitigate not only the short term impacts but also the legacy impacts likely to be felt by the local tourism sector.</p>
<p>Q2.13.8</p>	<p>NNDC</p>	<p>Your submission for Deadline 3 [REP3-103] includes a hyperlink to evidence in support of your argument that the maintenance period specified in Requirement 9 (implementation and maintenance of landscaping) should be 10 years.</p> <p>Please provide evidence which does not rely on a hyperlink.</p>	<p>Unfortunately, due to the nature of the document, it is not possible to provide a non web-based version. The ExA is advised to refer to the Forest Research section of the Forestry Commission website and to utilise the Ecological Site Classification Decision Support System. This is a map-based system which factors in climatic data and soil type to advise which species are suitable for a given location along with the likely yield class as an indicator of growth rate.</p> <p>NNDC regularly imposes a condition requiring a 10-year plant replacement period as standard practice on developments where the soft landscape element is a key component of a successful scheme.</p>

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Q2.13.10	Applicant, NNDC, BDC, SNC and NCC	<p>Requirement 22 (local skills and employment) states that a skills and employment plan shall be submitted to the relevant planning authority for approval.</p> <p>Given that the skills and employment plan would potentially relate to a wide area comprising the East Anglia and/or Humber regions, is it appropriate for it to be considered for approval by the relevant planning authority?</p> <p>Would it be more appropriate for it to be considered by NCC in consultation with the relevant planning authorities and Local Enterprise Partnerships?</p> <p>Who would be the appropriate determining authority in the Humber region?</p> <p>As the determining authority in the Humber region may not be an Interested Party, has there been any consultation to</p>	<p>NNDC would not object to NCC determining Requirement 22 subject to consultation with NNDC and other relevant bodies.</p>

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		<p>establish whether the authority would wish to have a determining role?</p> <p>Are there any other means for determining an application for approval under this requirement?</p>	
Q2.15.5	NNDC, BDC, SNC, NCC, NE	<p>The Applicant has submitted a revised Outline Code of Construction Practice (CoCP) [REP1-142].</p> <p>Are there any further revisions or additions that you consider should be made to this document?</p> <p>If there are, please provide justification for this and suggest any new/amended wording that may be required.</p>	<p>NNDC welcomes revisions made to the Outline Code of Construction Practice (CoCP) but has identified three areas of the document where further discussion or amendment may be required as follows:</p> <p>Para 4.1.1.5 – the running of support generators or emergency backup supplies. NNDC consider that the applicant should provide details of the equipment and noise control measures for this aspect of continuous working so that there is clarity from the outset.</p> <p>Para 4.1.1.1 / Para 6.1.1.5 – NNDC would welcome further discussion with the applicant about HGV waiting areas outside of designated arrival times / working hours to ensure there is no adverse noise impacts from waiting vehicles in the vicinity of work areas near noise sensitive receptors.</p>
Q2.15.6	Applicant, NNDC, BDC and SNC	The Outline CoCP [REP1-142] includes several matters where	NNDC understands that it is the intention of the applicant to submit details for prior notifications

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		<p>agreement is required between the Applicant and other parties. For example, paragraph 4.1.1.6 requires that certain activities may take place on a continuous working basis subject to obtaining agreement with the relevant local authority Environmental Health Officer.</p> <p>Should details be provided within the Outline CoCP of what the procedure and timescales should be for the matters where such agreements are required?</p>	<p>under the Control of Pollution Act 1974. For day to day activities this process may be appropriate. However, for more complex matters and those involving continuous working which may be expected to have a greater impact on the community, this may take longer than afforded under the Act. Additional consultation time would be requested and 56 days is suggested by NNDC as a reasonable timeframe within which to undertake this task.</p>
Q2.15.8	NNDC	<p>In its Local Impact Report [REP1-062] NNDC states that the Applicant should pursue with National Grid and UK Power Networks the opportunities for a secondary interconnection along the cable route in order to supply electricity where it may potentially be required to support housing and employment growth. The Applicant has responded [REP2-008] stating that the</p>	<p>NNDC can find no evidence that it made the statement being referred to by the ExA in any of its submissions to date.</p> <p>NNDC made reference in the Statement of Common Ground [REP2-011] to grid connection choices but has made no reference to a secondary interconnector in the Local Impact Report [REP1-062].</p> <p>NNDC request that the ExA provide further clarification on the information referred to so that NNDC can respond if necessary.</p>

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		<p>transfer from the National Grid to the local network and the capacity of the local transmission network is beyond the Applicant's control.</p> <p>In the context of the Hornsea Project Three DCO application, what measures does the Council consider could be practicably and reasonably secured?</p> <p>What is the legal and policy basis for securing such measures?</p>	

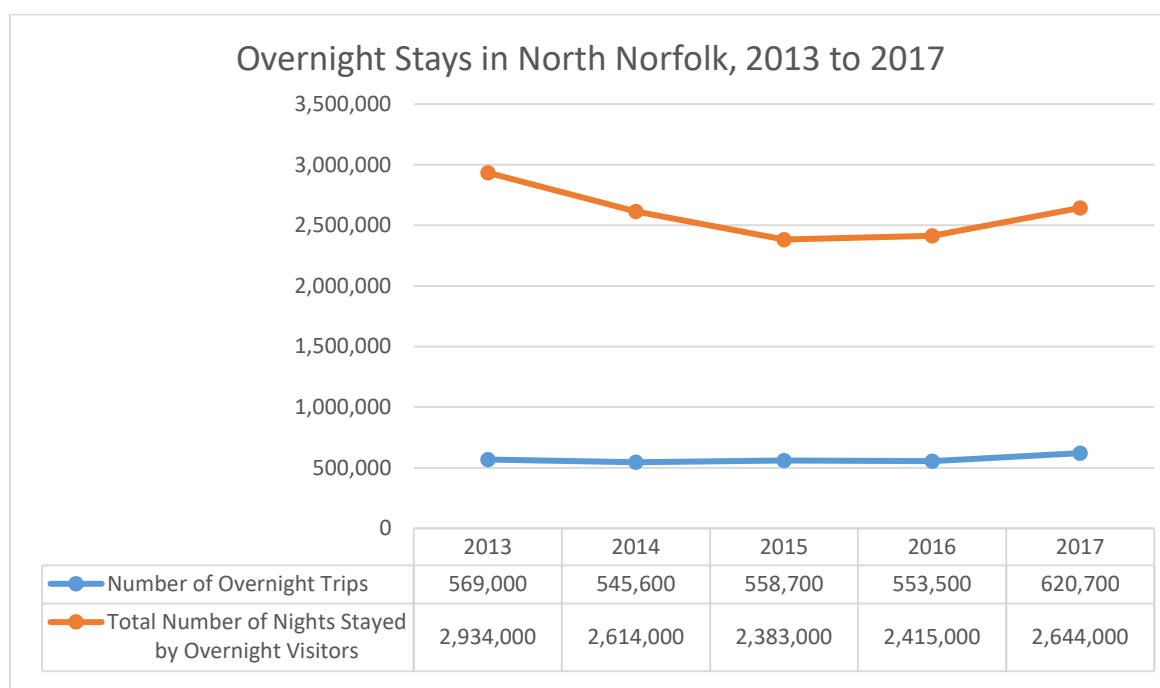
Appendix A – Evidence in Support of Q2.10.3

Evidence base – tourism statistics, North Norfolk

The number of visitors to North Norfolk has grown in recent years. The value of this to the visitor economy has consequently improved. Overnight stays generate the most value (per visit) and these have been more volatile – with the number of trips increasing but overall number of nights stayed, decreasing.

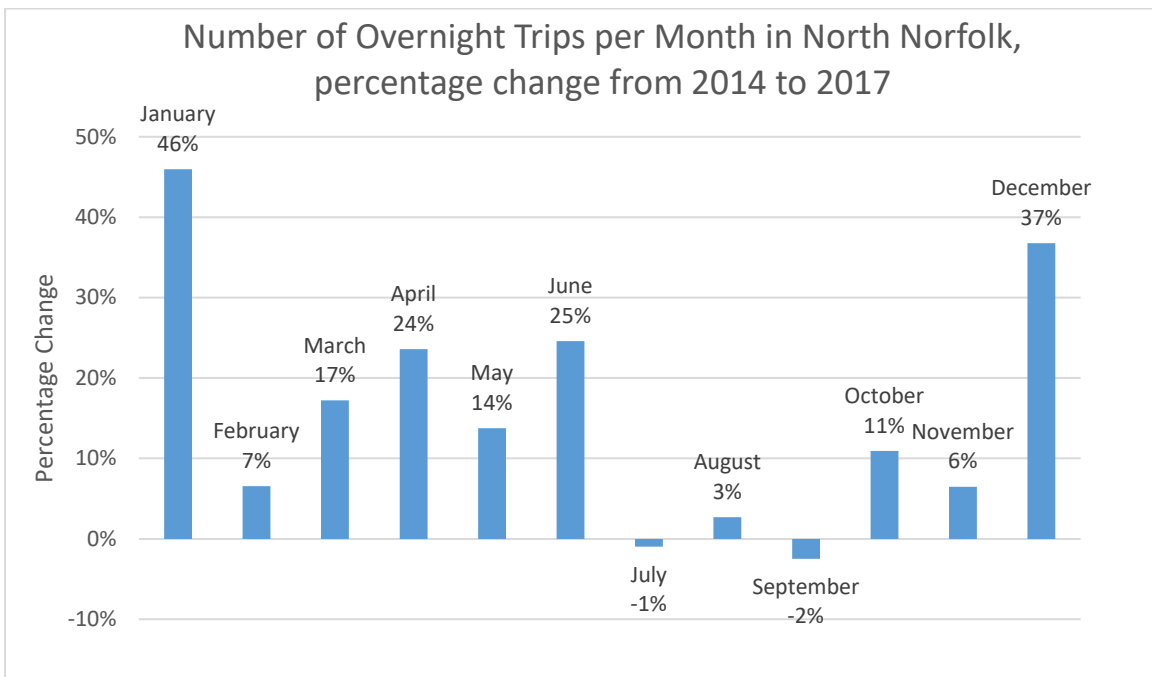
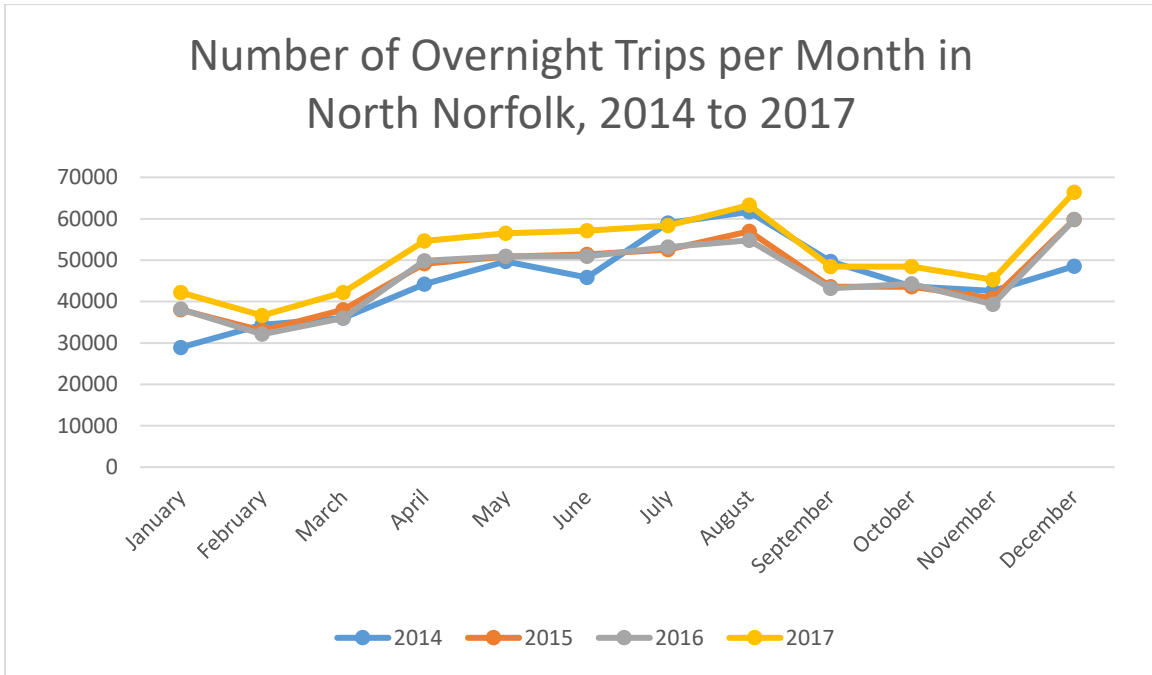
Seasonality is a key factor in sustaining the industry and the local communities that depend upon the facilities that the visitor economy supports. The profile of the ‘tourist season’ has changed markedly in recent years.

The charts below show the recent trends in overnight trips and seasonality.



Overnight Stays in North Norfolk, percentage change from 2013 to 2017

Number of Overnight Trips	9%
Total Number of Nights Stayed by Overnight Visitors	-10%



Data source: Jarques, Sergi (2018) Economic Impact of Tourism 2017 Results, Destination Research.