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Subject: Hornsea Project Three (UK) Ltd response to Deadline 5 (Part1)
Date: 23 January 2019 21:00:57
Attachments: [image003.png](#)
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[HOW03_Shell_Position_Statement.pdf](#)
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Dear Kay, K-J

We are pleased to enclose Ørsted Hornsea Project Three (UK) Ltd (“the Applicant”) response to Deadline 5, Wednesday 23rd Jan 2019. These documents have been prepared by the Applicant and have been produced in response to the Examining Authority’s (ExA) letter of 9 October 2018 (“the Rule 8 letter”).

These documents are being issued over a series of emails, each email containing a pdf file or files. The **last** email to be issued by the Applicant will contain a supporting file tracking sheet – to help the ExA ensure that it has received each email transmission.

Please acknowledge safe receipt of these documents.

If we can be of any assistance in that regard, please do not hesitate to contact myself or Andrew Guyton.

Best regards,
Dr Dominika Chalder PIEMA
Environment and Consent Manager



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Hornsea Project Three
Offshore Wind Farm



Hornsea Project Three Offshore Wind Farm

Statement of Common Ground between Ørsted Hornsea
Project Three (UK) Ltd. and North Norfolk District Council

Date: January 2019

Hornsea 3
Offshore Wind Farm

Ørsted

Statement of Common Ground between Ørsted Hornsea Project Three (UK) Ltd. and North Norfolk District Council

Ørsted

5 Howick Place,

London, SW1P 1WG

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Front cover picture: Kite surfer near a UK offshore wind farm © Ørsted Hornsea Project Three (UK) Ltd., 2019.

Revision History

Version	Date	Author	Context
1	September 2018	Ørsted	Pre-examination: Initial draft for discussion with North Norfolk District Council
2	October 2018	North Norfolk District Council (NNDC)	North Norfolk District Council (NNDC) completion
3	November 2018	North Norfolk District Council (NNDC)	North Norfolk District Council (NNDC) completion
4	20 November 2018	Ørsted and North Norfolk District Council (NNDC)	Final for submission at Deadline 2.
5	02 January 2019	Orsted	First Draft for Deadline 4
6	22 January 2019	North Norfolk District Council (NNDC)	Second Draft for Deadline 4
7	23 January 2019	Orsted	Final for submission at Deadline 5

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Acronyms

Acronym	Description
DCO	Development Consent Order
CEA	Cumulative Effect Assessment
CoCP	Code of Construction Practice
CTMP	Construction Traffic Management Plan
EIA	Environmental Impact Assessment
Ex.A	Examining Authority
EMP	Ecological Management Plan
HVAC	High Voltage Alternating Current
HVDC	High Voltage Directional Current
LMP	Landscape Management Plan
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
PEIR	Preliminary Environmental Information Report
PRoW	Public Right of Way
SoCG	Statement of Common Ground

1. Introduction

Overview

- 1.1 This Statement of Common Ground (SoCG) has been prepared by Orsted Hornsea Project Three (UK) Ltd. ('the Applicant') and North Norfolk District Council (together 'the parties') as a means of clearly stating the areas of agreement, and any areas of disagreement, between the two parties in relation to the proposed Development Consent Order (DCO) application for the Hornsea Project Three offshore wind farm (hereafter referred to as 'Hornsea Three'). This SoCG does not deal with or extend to any development other than Hornsea Three.

Approach to SoCG

- 1.2 This SoCG has been developed during the pre-examination phase of Hornsea Three. In accordance with discussions between the parties, the SoCG is focused on issues raised by North Norfolk District Council within its response to Scoping, Section 42 consultation and pre-application consultation.
- 1.3 The structure of this SoCG is as follows:
- Section 1: Introduction;
 - Section 2: Consultation;
 - Section 3: Agreements Log; and
 - Section 4: Summary.
- 1.4 It is the intention that this document will help facilitate post application discussions between the parties and also give the Examining Authority (Ex.A) an early sight of the level of common ground between both parties from the outset of the examination process.

Hornsea Three

- 1.5 Hornsea Three is a proposed offshore wind farm located in the southern North Sea, and will include all associated offshore (including up to 300 turbines) and onshore infrastructure.
- 1.6 The key components of Hornsea Three are:
- Turbines and associated foundations;
 - Array cables;
 - Offshore substation(s), and platform(s) and associated foundations;
 - Offshore accommodation platform/s and associated foundations;
 - Offshore export cable/s;
 - Offshore and/or onshore HVAC booster station/s (AC transmission option only);
 - Onshore cables (including the Hornsea Three landfall area); and
 - Onshore HVDC converter/HVAC substation.
- 1.7 The Hornsea Three array area (i.e. the area in which the turbines are located) is approximately 696 km² and is located approximately 121 km northeast off the Norfolk coast and 160 km east of the Yorkshire coast.

- 1.8 The Hornsea Three offshore cable corridor extends from the North Norfolk coast, offshore in a north-easterly direction to the western and southern boundary of the Hornsea Three array area. The Hornsea Three offshore cable corridor is approximately 163 km in length.
- 1.9 From the North Norfolk coast, underground cables will connect the offshore wind farm to an onshore HVDC converter/HVAC substation, which will in turn, connect to the existing National Grid substation near Swardeston. Hornsea Three will connect to the existing Norwich Main substation, located to the south of Norwich. The Hornsea Three onshore cable corridor is approximately 55 km in length at its fullest extent.

2. Consultation

Application elements within North Norfolk District Council’s administrative area

- 2.1 Work Nos. 5 to 9, 13 and 15 (Hornsea Three landfall works, the relevant section of the Hornsea Three onshore cable corridor, the onshore HVAC booster station, temporary vehicular access tracks and temporary storage areas) detailed in Part 1 of Schedule 1 of the draft DCO (Document A3.1) describe the elements of Hornsea Three which may affect the interests of North Norfolk District Council.
- 2.2 Based on the above, those technical topics of the DCO application of relevance to North Norfolk District Council, as set out above (and therefore considered within this SoCG) comprise:
- Ecology and Nature Conservation;
 - Landscape and Visual Resources;
 - Historic Environment (Onshore);
 - Land Use and Recreation;
 - Traffic and Transport;
 - Noise and Vibration;
 - Air Quality; and
 - Socio-economics.
 - Marine Processes
- 2.3 Within their Relevant Representation, North Norfolk District Council has expressed an interest in Marine Processes landward from Mean Low Water Springs (MLWS), specifically in relation to the method of bringing offshore cables onshore at Weybourne, which is included in this document.
- 2.4 In addition to the technical topics above, a general section is included below where those issues which either apply to multiple or none of the specific topic areas discussed.

Consultation summary

- 2.5 This section briefly summarises the consultation that the Applicant has undertaken with North Norfolk District Council.

Pre-application

- 2.6 The Applicant has engaged with North Norfolk District Council on Hornsea Three during the pre-application process, both in terms of informal non-statutory engagement and formal consultation carried out pursuant to section 42 of the Planning Act 2008.
- 2.7 Table 2.1 summarises the consultation undertaken between the parties during the pre-application phase, including consultation through scoping, consultation on the Preliminary Environmental Information Report (PEIR), further section 42 consultation undertaken in November 2017 and the focused section 42 consultation in February 2018.

Post-application

- 2.8 Table 2.2 summarises the consultation undertaken between the parties during the post-application phase.

Table 2.1: Pre-application consultation with North Norfolk District Council.

Date	Detail
12 May 2016	Introduction to Hornsea Project Three
21 July 2016	Initial engagement on Hornsea Project Three
17 October 2016	Project update including details of the public consultation events.
07 February 2017	Project update and discussion on landscape and visual, and noise assessments for the PEIR.
14 June 2017	Project update including programme, PEIR process and next steps.
09 November 2017	Project update including programme, review of S42 responses and onshore route refinements.

Table 2.2: Post application consultation with North Norfolk District Council.

Date	Detail
16 October 2018	Project Update and review of the Statement of Common Ground
07 December 2018	Hornsea Project Three ISH4
11 January 2019	Meeting with LPAs to discuss Requirements and discharge of Requirements (NNDC Landscape Officer and EHO in attendance)

3. Agreements Log

- 3.1 The following section of this SoCG identifies the level of agreement between the parties for each relevant component of the application (as identified in paragraph 2.1). In order to easily identify whether a matter is “agreed”, “under discussion” or “not agreed”, a colour coding system of green, yellow and orange, respectively, is used in the “final position” column to represent the respective status of discussions. All matters agreed under this SOCG will remain agreed through the examination process, unless there is compelling evidence or sound reasons to justify a change to the status of positions previously agreed.

General Points

- 3.2 Table 3.1 below identifies the status of discussions between the parties relating to issues which are project wide.

Table 3.1: General Points.

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
Need for Renewable Energy	There is a specific need to provide renewable energy, which is in line with government policy.	North Norfolk District Council 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.	Agreed
Adequacy of consultation	Proper pre-submission consultation activities were undertaken by the Applicant, including engagement with North Norfolk District Council and the local community.	North Norfolk District Council is satisfied that the Ørsted Hornsea Project Three Offshore Wind Project Team has engaged with the District Council over a period of more than two years in the development of their proposals for this major renewable energy scheme, which will achieve landfall on the North Norfolk coast. At the same time, the Project Team has undertaken extensive public consultation through staging public exhibitions and consultation events, hosting a project website and publishing newsletters providing information and inviting comment on the proposed development and particularly its potential impact upon local communities at the landfall point and along the onshore cable corridor route within North Norfolk.	Agreed

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
Site Selection and Route Refinement	<p>The site selection and route refinement outlined in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (A6.1.4) has properly considered the alternatives for the relevant elements of Hornsea Three.</p>	<p>Whilst the District Council were not in a position to directly influence the location of a grid connection offer made to Ørsted by National Grid Electricity Transmission Limited, once the grid offer location was known and landfall options were narrowed down to Zone 2 and Zone 4, NNDC agreed with the available evidence which pointed to a preference for landfall at Weybourne (Zone 2) rather than Zone 4 which had the potential to affect larger areas of the Norfolk Broads.</p> <p>The only area where the District Council would question the grid offer choices made by National Grid Electricity Transmission Limited is the consequence of cables for Ørsted Hornsea Project Three and cables for other wind farm proposals (Vattenfall Vanguard and Vattenfall Boreas) crossing at a location south of the North Norfolk District. Whilst this does not affect North Norfolk and it is through no fault of Ørsted, North Norfolk District Council believes it does emphasise the need for better joined-up thinking by National Grid on large infrastructure projects such as these as well as a need to improve network capacity generally.</p> <p>North Norfolk District Council has previously raised this issue with the Secretary of State for Business, Energy and Industrial Strategy directly and with senior officers at National Grid Electricity Transmission Limited.</p>	Agreed
Site selection of the onshore HVAC booster station	<p>The sites selected for the onshore HVAC booster station is appropriate based on the information presented within Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (6.1.4).</p>	<p>Ørsted has previously stated their intention early at the pre-application stage to construct a booster station in North Norfolk as part of a HVAC system. NNDC have therefore worked with Ørsted to find the least harmful location having regard to the technical constraints of site selection and having regard to, amongst other things, landscape character and visual impact. Whilst there remain a number of issues yet to be finalised in terms of HVAC booster station design (including building choices, materials, means of enclosure) as well as a final scheme of mitigation planting and measures to control noise, it is considered that such measures can be dealt with via requirements within the final DCO.</p>	Agreed

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
<p>Method for bringing offshore cables onshore</p>	<p>Use of either HDD or open cut at landfall, as described in Volume 1, Chapter 3: Project Description of the Environmental Statement, would be acceptable.</p>	<p>The District Council 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><i>'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...'</i></p> <p>In addition, 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. North Norfolk District Council 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.</p>	<p>Not Agreed</p>

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
Transmission System	<p>Inclusion of both HVAC and HVDC transmission systems within the envelope is appropriate to ensure that anticipated changes in available technology and project economics can be accommodated within the Hornsea Three design, and a decision on which transmission type to use will be made during the detailed design phase (post consent).</p>	<p>North Norfolk District Council recognise the desire of Ørsted to leave open the opportunity to use either HVAC or HVDC transmission.</p> <p>However, in light of commitments already made by other offshore wind farm developers passing cables through North Norfolk (Vattenfall Vanguard and Vattenfall Boreas) and whose proposals are currently going through or about to go through the DCO process, it is perhaps disappointing that a clear commitment could not also have been made by Ørsted prior to the DCO stage which would have helped reduce the Rochdale envelope associated with this project.</p> <p>That said, NNDC recognise it is a matter of planning judgment for the Planning Inspectorate and the Secretary of State as to whether one transmission type should be favoured over another having regard to the overall impacts/benefits of one transmission system over another. From the perspective of North Norfolk, the use of HVDC would, amongst other things, negate the need for the booster station(s) and associated impacts and would reduce the number of cables needing to be laid in the ground compared with the HVAC system. Fewer cables may also make bringing cables onshore easier and quicker resulting in fewer footpath/beach closures during construction stage.</p> <p>However, based on the fact that Ørsted have yet to make a final decision over the transmission system to be used, North Norfolk District Council accepts the requirement to work within a wide envelope as part of this DCO process and has engaged with Ørsted accordingly</p>	<p>Agreed</p>

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
EIA Methodology	<p>The use of a maximum design scenario (as set out in Volume 1, Chapter 5: Environmental Impact Assessment Methodology), which reflects the Rochdale Envelope approach, is appropriate for the purpose of the Environmental Impact Assessment for Hornsea Three.</p>	<p>North Norfolk District Council recognise that it is not possible to provide precise final design details of Hornsea Three, or the way it will be built, a number of years ahead of the time it will be constructed.</p> <p>NNDC recognise the Rochdale Envelope approach setting out the maximum design scenarios and therefore the scenario which would give rise to the greatest potential impact.</p> <p>NNDC note that the assessment of maximum design scenarios is complex and design choices such as, for example, the method of electricity transmission may bring both positive or negative consequences across the scheme as a whole.</p>	<p>Agreed</p>

Marine Processes

- 3.2 North Norfolk District Council's Relevant Representation raised concerns about the Hornsea Three offshore cable corridor landfall and effects of cable installation, specifically open cut trenching compared to trenchless techniques (e.g. HDD) and therefore this part of the SoCG has been set out to specifically address these concerns. The agreement log in Table 3.2 has therefore been drafted to directly address the concerns raised in relation to cable installation at the landfall and effects on marine processes and designated sites. This identifies the status of discussions relating to this topic between the parties.
- 3.3 The status of discussions relating to the effect of cable installation at the Hornsea Three landfall on onshore receptors (e.g. tourism and recreation) are considered in the socio-economics section below.

Table 3.2: Landfall and Effects on Marine Processes and Designated Sites.

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
<i>Volume 2, Chapter 1: Marine Processes of the Environmental Statement (Document A6.2.1)</i>			

Assessment conclusions	<p>The effects of open cut trenching on the nearshore marine processes (including beach morphology, sediment transport and hydrodynamics) has been robustly assessed in Paragraphs 1.11.5.19 to 1.11.5.26 of Volume 2, Chapter 1: Marine Processes of the Environmental Statement. The impact assessment concluded that there will be no significant impacts on the marine processes in the nearshore environment, with effects predicted to be short term, localised and reversible.</p> <p>The Applicant has provided commentary on NNDC’s concerns in their comments on NNDC’s Local Impact Report submitted at Deadline 2 (REP2-008).</p>	<p>Environmental Statement 1.11.5.19 states policy is ‘do nothing’ this is incorrect the policy is ‘No Active Intervention’.</p> <p>The Environmental Statement 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. 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>NNDC are not in agreement with the applicant’s position on open cut-trenching set out in their comments on NNDC’s Local Impact Report submitted at Deadline 2 (REP2-008).</p> <p>NNDC are unlikely to be able to agree with Ørsted that open cut trenching is an appropriate solution to bring cables onshore at Weybourne but nonetheless will remain in discussion with Ørsted in the hope that this aspect of the project can be scoped down to HDD options only within the final DCO decision.</p>	Not Agreed
	<p>The effects of HDD on the nearshore marine processes (including beach morphology, sediment transport and</p>	<p>NNDC concur with this assessment on HDD processes.</p>	Agreed

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
	hydrodynamics) has been robustly assessed in Paragraphs 1.11.5.19 – 1.11.7.11 of Volume 2, Chapter 1: Marine Processes of the Environmental Statement. The impact assessment concluded that there will be no significant impacts on the marine processes in the nearshore environment, with effects predicted to be short term, localised and reversible.		
Volume 5, Annex 2.3: Marine Conservation Zone Assessment of the Environmental Statement (Document A6.5.2.3)			
Assessment conclusions	<p>The implications of Hornsea Three on the features of the Cromer Shoal Chalk Beds MCZ and conservation objectives for the wider supporting environment has been fully considered in paragraphs 5.1.2.3 to 2.1.2.17, Volume 5, Annex 2.3, Marine Conservation Zone Assessment of the Environmental Statement.</p> <p>This considers effects of cable installation during the construction phase, including both scenarios for cable installation at the landfall (i.e. open cut and HDD operations). The MCZ assessment concluded that there was no risk to the conservation objectives or features of the MCZ, including supporting processes on which the designated features are reliant upon (e.g. wave energy and sediment transport).</p>	<p>NNDC have not been part of the offshore ecology/MCZ consultation process and cannot therefore comment on the assessment process or the conclusions of the assessment with respect to impact on the MCZ. NNDC defer to the advice of the statutory nature conservation organisations.</p>	N/A

Ecology and Nature Conservation

- 3.4 Hornsea Three has the potential to impact upon ecology and nature conservation, and these impacts are considered within Volume 3, Chapter 3: Ecology and Nature Conservation of the Environmental Statement (Document A6.3.3). North Norfolk District Council, among other stakeholders, have attended Onshore Ecology Expert Working Group meetings.
- 3.5 An Outline Code of Construction Practice (CoCP) and Outline Ecological Management Plan (EMP) have been prepared and capture relevant management and mitigation measures associated with this topic.
- 3.6 Table 3.3 identifies the status of discussions relating to this topic between the parties.

Table 3.3: Ecology and Nature Conservation.

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
Volume 3, Chapter 3: Ecology and Nature Conservation of the Environmental Statement (Document A6.3.3)			
Planning and Policy	Section 3.4 of Volume 3, Chapter 3: Ecology and Nature Conservation of the Environmental Statement has identified all appropriate plans and policies relevant to ecology and nature conservation in the application area and has given due regard to them within the assessments.	NNDC consider that Section 3.4 covers relevant national policy with respect to ecology and nature conservation.	Agreed
Baseline Environment	Sufficient primary and secondary data, as listed in Section 3.6 of Volume 3, Chapter 3: Ecology and Nature Conservation of the Environmental Statement, has been collated to appropriately characterise the baseline environment (in Section 3.7 of Volume 3, Chapter 3: Ecology and Nature Conservation of the Environmental Statement) to inform the EIA.	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. 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.	Agreed
	The future baseline identified to inform the EIA in Section 3.7.4 of Volume 3, Chapter 3: Ecology and Nature Conservation of the Environmental Statement is considered appropriate.		
Assessment methodology	The potential impacts identified in Section 3.11 of Volume 3, Chapter 3: Ecology and Nature Conservation of the Environmental Statement represent a comprehensive list of potential impacts on Ecology and Nature Conservation from the construction, operation and maintenance and decommissioning of Hornsea Three.	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.	Agreed

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
	<p>The assessment methodology and maximum design scenarios identified for each impact as outlined in Volume 3, Chapter 3: Ecology and Nature Conservation of the Environmental Statement is appropriate.</p> <p>The list of projects screened into the CEA in Section 3.12.1 of Volume 3, Chapter 3: Ecology and Nature Conservation of the Environmental Statement are appropriate.</p>		
Assessment conclusions	<p>The assessment of potential effects on ecology and nature conservation landward of MHWS during the construction, operation and maintenance, and decommissioning of Hornsea Three in Section 3.11 of Volume 3, Chapter 3: Ecology and Nature Conservation of the Environmental Statement is appropriate and accurate given the implementation of the measures adopted as part of Hornsea Three (outlined in Section 3.10 of Volume 3, Chapter 3: Ecology and Nature Conservation of the Environmental Statement).</p> <p>The mitigation of impacts relating to Pink Footed Geese, is dealt with as a separate issue below.</p>	<p>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>	Agreed

	<p>With the exception of the impact of open cut trenching, installation of cables, and construction and use of access tracks, to cause habitat loss and disturbance between November and January (inclusive) on Pink Footed Geese, no further mitigation to those embedded measures identified in Section 3.10 of Volume 3, Chapter 3: Ecology and Nature Conservation of the Environmental Statement, the Outline CoCP (Document A8.5) and Outline EMP (document A8.6) are necessary as a result of the assessment conclusions. Section 10 of the Outline EMP outlines the optimal and optional timings of enhancement/mitigation works, with the implications of phasing also addressed in Section 4 under each relevant topic area.</p> <p>The reference to 'proportionate replacement' is in relation to bat habitat and bat roost creation. The need for a European Protected Species licence, and the nature of its associated mitigation strategy, in respect to bats will be confirmed through pre-construction surveys (as set out in Table 3.19 of Volume 3, Chapter 3: Ecology and Nature Conservation). However, the Applicant will engage with Natural England in order to obtain a Letter of No Impediment (LONI) during the course of the Examination.</p> <p>The Applicant has committed to replace 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 enhancement along a wider strip (subject to landowner agreement) would be beneficial in improving the receiving habitat structure as</p>	<p>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 with any consent. However, there remains a question mark about actual quantity of mitigation and enhancement features following post-construction.</p> <p>NNDC would welcome further discussion with Ørsted to clarify replacement for hedgerows and trees removed as along the route.</p> <p>Para 4.1.1.3 of the Landscape Management Plan still contains rather vague promises about hedgerow replanting and hedgerow tree replanting. NNDC still maintain that replacement tree planting should be broadened beyond the 100m wide limit referred as this distance is considered too prescriptive. The LMP still refers to needing agreement of landowner for replacement planting which continues to present the risk that some mitigation planting might not take place if the landowner does not want it? This should be clarified along with who will undertake management and maintenance over the lifetime of the development.</p> <p>Clarity would also be welcomed as to when the 5/10 year replacement planting period would start given the intention for early implementation of some aspects of the landscape mitigation and others which would be delivered later on in the project.</p> <p>NNDC welcomes the use of Horizontal Directional Drilling (HDD) techniques so as to avoid sensitive or designated sites so as to minimise any potential impacts upon them.</p>	<p>Under Discussion</p>
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Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
	<p>well as connectively and integration into the surrounding landscape.</p> <p>A Pink-footed Goose Management Plan will be prepared and submitted to Natural England for approval in the 12 months preceeding commencement (post-consent). This 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>In response to a request by the ExA, the Applicant has provided an Outline Pink Footed Geese Management Plan as Annex F to the Outline CoCP, updated and submitted as Appendix 2 to Deadline 4. This has been provided to North Norfolk District Council, RSPB and Natural England for comment.</p>	<p>NNDC have reviewed the Outline Pink Footed Geese Management Plan submitted by Ørsted as Annex F to the Outline CoCP, updated and submitted as Appendix 2 to Deadline 4.</p> <p>NNDC are reassured that reasonable efforts will be made to ensure no likely significant effect on PFG through the decision tree and process and mitigation principles as described in the document and to be developed in discussion with Natural England.</p>	

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
	<p>The Applicant considers it appropriate to manage any new or replacement hedgerows planted for a period of 5 years beginning at the point of planting. Based on the species and age of the woody species selected (as noted in the outline LMP), this would give time for a hedge to establish to a height of approximately 2m (accounting for 40-60cm high whips planted and 30cm average growth per year for the first 5 years, according to the EIA quality mark article (submitted as Appendix 40 at Deadline 4) from the Institute of Environmental Management and Assessment) which would provide full landscape mitigation. As the species-rich mix of plants would be established at this point, this would also be full ecological mitigation. After 5 years, for all locations where hedges may be removed as part of Hornsea Three construction works, failure is very unlikely and the hedges will be restored back to an improved baseline status (species rich and gap filled). Any ongoing maintenance would be comparable to that existing prior to construction and therefore does not need to be secured through the DCO. This is in line with the arrangements in place for restored agricultural land – the responsibility passes back to the landowner.</p>	<p>Clarity would be welcomed as to when the 5/10 year replacement planting period would start given the intention for early implementation of some aspects of the landscape mitigation and others which would be delivered later on in the project. If it starts at the pointing of planting, how would the relevant LPA know when the period starts?</p> <p>Not clear whether replacement includes both hedgerows and hedgerow trees and blocks of woodland planting.</p> <p>If our understanding is correct, the EIA quality mark is linked to LDA Design. How does this translate through to the contractor and/or landowner responsible for carrying out planting and maintenance?</p> <p>If the ExA accede to a five year replacement period for planting, what contingencies would Ørsted put in place in case of subsequent failure(s), post the five year period?</p> <p>How confident can the LPA and ExA be of a 2m growth after five years? Do you have relevant examples to back up the growth rates in North Norfolk?</p>	<p>Under Discussion</p>

<p>The quantity of hedgerows to be removed during the construction works are set out in Section 3.11 of Volume 3, Chapter 3: Ecology and Nature Conservation of the Environmental Statement. The assessment of the potential effects, which states that once the proposed mitigation has been implemented and the replacement hedgerows matured (section 2.2.7 of the Outline EMP (APP-180) and paragraph 4.1.1.3 of the Outline Landscape Management Plan (APP-181)) this would result in a positive effect on the hedgerow habitat, is accurate and appropriate.</p> <p>Hornsea Three has sought to minimise impacts on woodland through route refinement and site selection. Although some small areas of woodland removal may be required under the maximum design scenario, the conclusion presented within paragraph 3.11.1.22 of Volume 1, Chapter 3: Ecology and Nature Conservation of the Environmental Statement, which states that there would be no significant effects on woodland is accurate. Alongside this, the measures set out in the Outline EMP to mitigate potential impacts to existing trees and woodland which could not be avoided is appropriate. This includes, for example, the implementation of a works-free buffer zone around mature trees wherever practicable (paragraph 5.3.2.1 of the Outline EMP).</p> <p>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</p>	<p>NNDC welcome the commitment from Ørsted to replace the loss of all hedgerows with species rich hedgerows, as identified in Section 3.11. 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 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>However, NNDC consider that positive effects 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>Table 3.19 refers to shallow rooted hedgerow species – please state the species that Ørsted consider would be suitable replacements so that NNDC can be certain that suitable species diversity can be achieved.</p> <p>NNDC is satisfied that, subject to the above comments, the measures adopted in relation to the loss of hedgerows/trees/woodland is sufficient given the minor adverse effect of the proposed development.</p>	<p style="text-align: center;">Agreed</p>
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Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
	relevant local authorities, including NNDC. The principles of this maintenance and management is set out in Section 5 of the Outline LMP (REP1-145).		
	The assessment of potential cumulative impacts on ecology and nature conservation receptors landward of MHWS in Section 3.13 of Volume 3, Chapter 3: Ecology and Nature Conservation of the Environmental Statement is appropriate and accurate.	NNDC considers that the conclusions of the cumulative assessment are appropriate.	Agreed
<i>Draft Development Consent Order</i>			
Commitments / restrictions	The commitment 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 North Norfolk District Council) prior to the commencement of works are appropriate control measures for managing the potential effects on ecology and nature conservation landward of MHWS. The EMP and CoCP will include all relevant embedded measures cited within Volume 3, Chapter 3: Ecology and Nature Conservation of the Environmental Statement, the Outline EMP (Document A8.6) and Outline CoCP (Document A8.5).	NNDC considers the ecological requirements set out in the draft DCO are appropriate but further discussion is taking place to finalise the wording	Under Discussion

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
<i>Outline Management Plans</i>			

<p>Ecological management</p>	<p>The management measures described to minimise impacts on ecology receptors, including the appointment of an Ecological Clerk of Works and pre-construction surveys, in Outline Code of Construction Practice (Document A8.5) and Outline Ecological Management Plan (Document A8.6) are appropriate for managing the potential effects on ecology and nature conservation landward of MHWS.</p> <p>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 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</i></p>	<p>NNDC consider that, subject to confirmation of points raised within this SoCG, the measures set out within the Outline CoCP and Outline EMP are sufficient and appropriate to manage impacts relating to ecology and nature conservation.</p>	<p>Agreed</p>
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Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
	<p><i>considered necessary to ensure adherence to the requirements of the Plan and relevant legislation. trees to provide immediate potential roost sites as mitigation for lost tree holes of potential value to roosting bats. <u>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></p> <p>Furthermore, the Applicant is in the process of developing a licence application to submit to Natural England with the purpose of securing a Letter of No Impediment. The licence application will be submitted to Natural England shortly and will set out mitigation should a bat roost be disturbed or lost.</p>		

Landscape and Visual Resources

- 3.7 Hornsea Three has the potential to impact upon landscape and visual resources, and these impacts are considered within Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement (Document A6.3.4). Table 3.4 identifies the status of discussions relating to this topic between the parties.

Table 3.4: Landscape and Visual Resources.

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
<i>Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement (Document A6.3.4)</i>			

<p>Planning and Policy</p>	<p>Section 4.4 of Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement has identified all appropriate plans and policies relevant to landscape and visual resources in the application area and has given due regard to them within the assessments.</p> <p>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>Notwithstanding this, the Applicant has undertaken a review of the documents and would provide the following commentary:</p> <ul style="list-style-type: none"> • The North Norfolk Landscape Character Assessment updates the District’s previous (current) North Norfolk Landscape Character Assessment, Supplementary Planning Document Adopted June 2009 that we referred to in Volume 3, Chapter 4, Landscape and Visual Resources chapter of the ES (APP-076). It has changed some of the boundaries and names of landscape 	<p>NNDC considers that Ørsted have given appropriate regard to relevant national policy.</p> <p>NNDC set out in the SoCG submitted at Deadline 2 that, in respect of relevant Local Policy and material planning considerations, in 2018 North Norfolk District Council commissioned two new studies:</p> <p>a) revised Landscape Character Assessment; and</p> <p>b) a new Landscape Sensitivity Assessment (with particularly reference to renewable energy and low carbon development).</p> <p>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 SPD in Spring/Summer 2019.</p> <p>The latest position/comments of Ørsted are noted in relation to the above documents. NNDC consider that Ørsted have not properly understood the status of these documents. For the purpose of this DCO, the revised LCA and LSS are not just emerging policy but represent the most up to date and accurate evidence base in accordance with current best practice. It is therefore incorrect of Ørsted to seek to diminish the weight that the ExA should give to these documents. These are material considerations to which significant weight can be afforded by the ExA in terms of assessing the relevant baseline.</p> <p>Notwithstanding the difference of opinion on the status of the above documents, NNDC notes the review of the revised LCA and LSS undertaken by the applicant and accepts the overall conclusions reached.</p>	<p>Under Discussion</p>
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Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
	<p>character types (LCTs) and landscape character areas (LCAs), but they are broadly similar and would not affect the outcomes or conclusions of the assessment presented within APP-076.</p> <ul style="list-style-type: none"> The North Norfolk Landscape Sensitivity Assessment includes an assessment of the sensitivity of LCTs to various types of renewable energy development including onshore cable routes (for offshore wind farms) and cable relay stations and sub-stations. The North Norfolk Landscape Sensitivity Assessment assesses the sensitivity to onshore cable works of some LCTs to be higher than assessed in APP-076. However, the changes would not lead to effects greater than minor significance as assessed in APP-076. The North Norfolk Landscape Sensitivity Assessment assesses the sensitivity of the host LCT (TF1) to onshore relay stations as medium. Volume 3, Chapter 4, Landscape and Visual Resources chapter of the ES (APP-076) assesses the host character areas to be medium (TF3, para 4.11.2.15) and high-medium (WP5, para 4.11.2.23). The sensitivity level in the North Norfolk Landscape Sensitivity Assessment would therefore not lead to any increases in effects on landscape character due to the onshore booster station to that presented in APP-076. 		

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
Baseline Environment	<p>Sufficient primary and secondary data, as listed in Section 4.7 of Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement, has been collated to appropriately characterise the baseline environment (in Section 4.8 of Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement) to inform the EIA.</p> <p>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, which are not yet in the public domain 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. Volume 3, Chapter 4: Landscape and Visual Resources chapter of the Environmental Statement (APP-076). Instead, 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>The Applicant refers to the points raised above in respect to the emerging planning policy.</p> <p>The future baseline identified to inform the EIA in Section 4.7.7 of Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement is considered appropriate.</p>	<p>In respect of relevant Local Policy and material planning considerations, in 2018 North Norfolk District Council commissioned two new studies:</p> <p>a) revised Landscape Character Assessment; and</p> <p>b) a new Landscape Sensitivity Assessment (with particularly reference to renewable energy and low carbon development).</p> <p>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 SPD in Spring/Summer 2019.</p> <p>NNDC note the position of Ørsted in relation to their interpretation of the status of the above documents. These documents currently constitute part of the evidence base in formulating a new Local Plan. These documents are not emerging policy but represent the most up to date available evidence in accordance with best practice. The HP3 team need to be made aware that these documents will be adopted next year as SPDs and therefore it is the view of NNDC that the baseline environment needs to take account of these new resources to help inform the management of future change and to ensure consistency with the NPPF (including paras 151 and 154).</p>	<p>Under Discussion</p>

<p>Assessment methodology</p>	<p>The potential impacts identified in Section 4.11 of Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement represent a comprehensive list of potential impacts on landscape and visual resources from the construction, operation and maintenance and decommissioning of Hornsea Three.</p> <p>The Applicant would clarify that the statement made in paragraph 4.11.1.5 of Volume 3, Chapter 4: Landscape and Visual Resources relates to significant blocks of woodland, all of which would be crossed using HDD, whilst paragraph 3.11.1.19 of Volume 3, Chapter 3, Ecology and Nature Conservation relates to small individual patches of woodland. Notwithstanding this clarification, the Applicant has reviewed the assessment provided within Chapter 4 Landscape and Visual Resources and can confirm that loss of these individual patches was taken into consideration in the assessment and thus the conclusions as presented remain valid.</p> <p>The Applicant has committed to a number of HDDs at specific locations as specific in the Onshore Crossing Schedule (provided as Appendix 3 at Deadline 3 (REP3-012)). There are some locations where flexibility has been retained such that additional HDDs can be added should it be deemed appropriate to do so. It is noted that a balance between the use of HDD, and other project considerations, including technical deliverability and impacts on the local road network associated with a less practical and thus useable haul road along the onshore cable corridor needs to be reached.</p>	<p>NNDC note the alteration of the wording of para 4.11.1.5 of Volume 3 Chapter 4 by Ørsted to include the word 'significant' in relation to blocks of woodland that would be crossed using HDD.</p> <p>However, at this early stage in the project, NNDC would not wish to rule out further inclusion of sections of HDD where there are compelling justifications for doing so.</p>	<p>Under Discussion</p>
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Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
	<p>The assessment methodology and maximum design scenarios, as outlined in Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement, is appropriate based on the information presented in Volume 1, Chapter 3: Project Description of the Environmental Statement (Document A6.1.3).</p>	<p>NNDC agrees that this has been fully considered.</p>	<p>Agreed</p>
	<p>The locations and methodology used to prepare the visualisations (wireframes and photomontages), 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, are appropriate.</p>	<p>NNDC consider that the selected viewpoints and visualisations provide a sufficient basis on which to assess the likely landscape and visual impact.</p>	<p>Agreed</p>
	<p>The list of projects screened into the CEA in Section 4.12.1 of Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement are appropriate.</p> <p>Bacton Sand Engine Project has been referenced in Volume 4, Annex 5.2: Cumulative Effects Screening Matrix (APP-097) and has been screened into the cumulative assessments for multiple topics in Volume 2 (offshore chapters) of the Environmental Statement. No potential for cumulative effects were identified for onshore matters, including landscape and visual resources in respect to Bacton Sand Engine Project.</p>	<p>NNDC considers that the CEA is comprehensive and makes full consideration of all projects and plans currently in development. NNDC welcomes the inclusion of the Bacton Sand Engine Project within the CEA.</p>	<p>Agreed</p>

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
Assessment conclusions	<p>The assessment of 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 is appropriate and accurate given the implementation of the measures adopted as part of Hornsea Three (outlined in Section 4.10 of Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement). This assessment is based on a maximum design scenario of the HVAC booster station as set out in Table 4.6 of the same chapter, which includes a maximum height of building/equipment of 12.5 m across the permanent area of the site.</p>	<p>NNDC considers that these effects have been fully assessed.</p>	<p>Agreed</p>

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
	<p>Hornsea Three has sought to implement mitigation along the onshore cable corridor at the next available planting season after each phase of cable installation to mitigation potential landscape impacts (as stated in paragraph 4.1.1.3 of the Outline LMP (A8.7). Should it not be possible to reinstate hedgerows immediately following construction of each phase, the commitment (set out in paragraph 6.3.3.5 of the Outline EMP (A8.5)) to provide temporary artificial hedges is appropriate. These artificial hedges will be retained in situ until replacement planting has been carried out between phases and, where necessary, until replacement hedges have become established to provide effective habitat links between the severed sections of the hedgerows, which will also provide temporary landscape mitigation until replacement planting has matured.</p> <p>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).</p>	<p>NNDC consider that positive effects 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>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>NNDC is satisfied that, subject to the above comments, the measures adopted in relation to the loss of hedgerows/trees/woodland are sufficient.</p> <p>NNDC welcome the confirmation from Ørsted that relevant LPAs will be involved in approving the detail of the final LMP.</p>	<p>Agreed</p>

	<p>The indicative landscape planting proposed at the onshore HVAC booster station, including the proposed species mix and specification, as shown in Appendix A of the Outline LMP (A8.7) is appropriate and integrates the proposals into the landscape context.</p> <p>Alongside this, the commitment to create strengthened hedgerows along field boundaries to the north, west and south of the onshore HVAC booster station (also shown in Appendix A of the Outline LMP (A8.7) that would provide further screening and filtering of views, enhance landscape character and provide enhanced habitats for wildlife is appropriate.</p> <p>Further details of the mitigation planting would be provided in the final LMP to be developed in consultation with the relevant local authorities' post-consent (under Schedule 1, Part 3, Requirement 8 of the draft DCO, see below). However, it is noted that since the point of application, the Applicant has committed to planting sections of the mitigation planting at the commencement of works at the onshore HVAC booster station, which could be up to two years ahead of the planned completion of construction works, in order to maximise the screening provided in the shortest period of time. It is therefore proposed to add the following wording at newly created paragraph 3.1.2.3 of the Outline LMP:</p> <p><i>“3.1.2.3 Hornsea Three has committed to implementing sections of the mitigation planting at the commencement of works at the onshore HVAC booster station, which could be up to two years ahead of the planned completion of construction works, in order to maximise the screening provided in the shortest period of time.</i></p>	<p>NNDC support the principle of early implementation of sections of mitigation planting in relation to the booster station.</p> <p>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.</p> <p>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>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>NNDC welcome the confirmation from Ørsted that relevant LPAs will be involved in approving the detail of the final LMP.</p>	<p>Agreed</p>
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Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
	<p><i>Areas which will not be pre-planted comprise planting to the immediate north and south of the permanent HVAC booster station site (where it connects to the onshore cable corridor), a 5 m buffer around the permanent site and between the permanent footprint and temporary construction site. These areas will not be pre-planted to facilitate the construction works at the site. Further details of the pre-planting to be undertaken at the onshore HVAC booster station will be provided in the final LMP which will be submitted and agreed with the relevant local planning authorities"</i></p> <p>The Applicant will confirm the final species mix and specification for the onshore HVAC booster station in the final LMP to be prepared prior to the commencement of a given phase. This will be submitted to and approved by the relevant planning authority (including NNDC) in consultation with Natural England (under Requirement 8 of the draft DCO). It is noted that the mix included within the Outline LMP comprises a range of sizes and consideration will be given to the inclusion evergreen species requested by NNDC in the development of the final LMP. Details of planting density would also be subject to agreement with NNDC through the preparation of the detailed LMP (Requirement 8).</p>		

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
	No further mitigation to those embedded measures identified in Section 4.10 of Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement and the Outline CoCP (Document A8.5) are necessary as a result of the assessment conclusions.	Subject to the embedded measures being amended to reflect the comments within this SoCG, NNDC agree that no further mitigation measures are necessary.	Agreed
	The assessment of potential cumulative impacts on Landscape and Visual Resources in Section 4.13 of Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement is appropriate and accurate.	Agreed	Agreed
<i>Draft Development Consent Order</i>			
Commitments / restrictions	The commitment to produce both an 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 North Norfolk District Council) prior to the commencement of works are appropriate control measures for managing the potential effects on landscape and visual resources. The LMP, EMP and CoCP will include all relevant embedded measures cited within Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement, the Outline LMP (Document A8.7), Outline EMP (Document A8.6) and Outline CoCP (Document A8.5).	Agreed	Agreed

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
	<p>The requirement to agree details including the layout, scale, finished ground levels, external appearance, materials, minor structures, such as furniture, refuse or other storage units, signs and lighting, access and circulation areas, and timetables for the landscaping works at the onshore HVAC booster station will be submitted to and approved by the North Norfolk District Council prior to commencement of construction (Schedule 1, Part 3, Requirement 7 of the draft DCO).</p>	<p>Agreed.</p>	<p>Agreed</p>
Outline Management Plans			
<p>Landscape and visual resources management</p>	<p>The management measures described in the Outline LMP (Document A8.7), Outline EMP (Document A8.6) and Outline CoCP (Document A8.5) are appropriate to minimise impacts on landscape and visual resources.</p> <p>The Applicant will continue to discuss matters regarding the Outline LMP, particularly plant replacement in the event of failure and woodland management (see above), with North Norfolk District Council in order to close out the queries raised in this SoCG.</p>	<p>NNDC would request that, in respect of woodland and woodland edges (OLMP para 5.3.1.1), plant failures should be replaced for a period of 10 years following planting.</p> <p>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>Under Discussion</p>

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
	<p>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. These principles will be applied for the five years after planting.</p> <p>The Applicant will continue to discuss matters regarding the Outline LMP, particularly ensuring sufficient clarity is provided on maintenance and management of planting, with North Norfolk District Council in order to close out the queries raised in this SoCG.</p>	<p>See Above</p> <p>Also, NNDC request clarification as to who will be undertaking management of all planting and how this would be secured.</p>	<p>Under Discussion</p>

Land Use and Recreation

- 3.8 Hornsea Three has the potential to impact upon land use and recreation, and these impacts are considered within Volume 3, Chapter 6: Land Use and Recreation of the Environmental Statement (Document A6.3.6). An Outline Code of Construction Practice (Outline CoCP) has been prepared which captures relevant management and mitigation measures associated with this topic.
- 3.9 Table 3.5 identifies the status of discussions relating to this topic between the parties.

Table 3.5: Land Use and Recreation.

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
Volume 3, Chapter 6: Land Use and Recreation of the Environmental Statement (Document A6.3.6)			
Planning and Policy	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 and has given due regard to them within the assessments.	With the exception of reference to a now out of date 2012 NPPF, Section 6.4 of Volume 3, Chapter 6: Land Use and Recreation has identified all appropriate plans and policies relevant to land use and recreation in the application area. Para 6.4.2.1 should be amended to delete "(2012)" from the first bullet.	Agreed
Baseline Environment	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.	Agreed	Agreed
	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.		
Assessment methodology	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.	Agreed	Agreed

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
	<p>The assessment methodology and maximum design scenarios, as outlined in Volume 3, Chapter 6: Land Use and Recreation of the Environmental Statement, is appropriate based on the information presented in Volume 1, Chapter 3: Project Description of the Environmental Statement (Document A6.1.3).</p> <p>Although the maximum design scenario has not changed since the point of application, the commitment by Hornsea Three to install the cable through ducting (as opposed to direct burial) and to pre-duct for the second phase at the same time as installing the ducts for the first phase, should there be certainty that the second phase will go ahead (by means of having secured a CFD for two phases in the same auction round), is appropriate. This is appropriate as, without certainty that the second phase will go ahead, the pre-installation of ducts for this phase could cause greater disruption than is necessary to the communities along the onshore cable corridor and a greater environmental impact should the second phase ultimately not be delivered. These commitments will be captured in paragraphs 1.1.1.6 and 1.1.1.7 of the updated Outline CoCP (APP-179) to be submitted by the Applicant at Deadline 1. The final CoCP will accord with the Outline CoCP (secured by Requirement 17 of the dDCO).</p>	<p>NNDC welcome the commitment from Ørsted to duct the first phase of Hornsea Project Three and the second phase (if certain circumstances arise), 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>NNDC consider that by laying all ducting in a single phase, a simpler cable pull through process would be possible in phase two which would help reduce disturbance impacts and speed up project completion. It would also help reduce the impacts from construction traffic in phase two by reducing the need for vehicles bringing imported stabilised backfill material over a wide time period. Completing the majority of trench works in phase one would also allow time for soils to recover and reduce the length of time taken out of agricultural production.</p> <p>NNDC note the amendments to the CoCP and would wish to work with Ørsted so as to enable a project phasing which can minimise the period/duration of construction impacts.</p>	<p>Under Discussion</p>
	<p>The list of projects screened into the CEA in Section 6.12.1 of Volume 3, Chapter 6: Land Use and Recreation of the Environmental Statement are appropriate.</p>	<p>Agreed</p>	<p>Agreed</p>

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
Assessment conclusions	The assessment of potential effects on land use and recreation during the construction, operation and maintenance, and decommissioning of Hornsea Three in Section 6.11 of Volume 3, Chapter 6: Land Use and Recreation of the Environmental Statement is appropriate and accurate given the implementation of the measures adopted as part of Hornsea Three (outlined in Section 6.10 of Volume 3, Chapter 6: Land Use and Recreation of the Environmental Statement).	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	Agreed

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
	<p>No further mitigation to those 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) are necessary as a result of the assessment conclusions.</p>	<p>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.</p> <p>NNDC welcome the commitment from Ørsted to duct the first phase of Hornsea Project Three and the second phase (if certain circumstances arise), 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>NNDC consider that by laying all ducting in a single phase, a simpler cable pull through process would be possible in phase two which would help reduce disturbance impacts and speed up project completion. It would also help reduce the impacts from construction traffic in phase two by reducing the need for vehicles bringing imported stabilised backfill material over a wide time period. Completing the majority of trench works in phase one would also allow time for soils to recover and reduce the length of time taken out of agricultural production.</p> <p>NNDC note the amendments to the CoCP and would wish to work with Ørsted so as to enable a project phasing which can minimise the period/duration of construction impacts.</p>	<p>Under Discussion</p>

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
	The assessment of potential cumulative impacts on land use and recreation in Section 6.13 of Volume 3, Chapter 6: Land Use and Recreation of the Environmental Statement is appropriate and accurate.	Agreed	Agreed
<i>Draft Development Consent Order</i>			
Commitments / restrictions	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 North Norfolk District Council) prior to the commencement of works are appropriate control measures for managing the potential effects on land use and recreation. The CTMP and CoCP will include all relevant embedded measures cited within Volume 3, Chapter 6: Land Use and Recreation of the Environmental Statement, the Outline CTMP (Document A8.2) and Outline CoCP (Document A8.5).	NNDC welcome these commitments which will help to reduce potential adverse impacts. 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.	Agreed

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
<i>Outline Management Plans</i>			
Land Use and Recreation management	<p>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) are appropriate.</p> <p>In order to reduce effects as far as possible, Hornsea Three has committed to a number of mitigation measures detailed within Table 6.28 of Volume 3, Chapter 6: Land Use and Recreation of the Environmental Statement [APP-078]. These include the development of a soil management strategy with the principle objectives of conserving soil resources; avoiding damage to soil structures; maintaining soil drainage; and identifying principles for the reinstatement of the soil profile.</p> <p>This Soil Management Strategy will set out the principles of an aftercare programme, to be implemented following the reinstatement of the soil, which will be agreed with the individual landowners. The Soil Management Strategy will form part of the final CoCP to be submitted and agreed with the relevant planning authority (including NNDC) under Requirement 17 of the draft DCO [APP-027] and is referred to in paragraph 6.8.1.1 of the Outline CoCP (APP-179).</p>	Agreed. It would be expected that these matters will be clarified when approving current requirement 17 and 18 of the DCO.	Agreed

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
<p>PRoW Management Plan</p>	<p>The commitment to submit a PRoW Management Plan as part of the detailed CoCP (which is secured through Requirement 17 or the draft DCO) to be approved by North Norfolk District Council as the relevant planning authority, and developed in consultation with Norfolk County Council and NNDC, is appropriate. The mechanism by which the PRoW management plan is secured has been clarified through updates to paragraph 6.8.1.22 of the Outline CoCP (APP-179) (new text shown in underline):</p> <p><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 a details within the PRoW Management Plan to be <u>provided as an appendix to the final CoCP and approved by North Norfolk District Council and Norfolk County Council</u> as the relevant planning authorities y, developed in consultation with Norfolk County Council.</i></p> <p>Initial discussions as to the details of proposed diversions and management measures (to help inform the preparation of the PRoW Management Plan in due course), have been initiated with NCC and NNDC, including through the Norfolk Trails Partnership,</p>	<p>Addition to CoCP (para 6.8.1.22) to include PROW are noted and welcomed.</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> <p>If clarification/confirmation can be given that NNDC will be properly consulted then this matter can be considered agreed.</p>	<p>Under Discussion</p>

Traffic and Transport:

- 3.10 Hornsea Three has the potential to impact upon traffic and transport, and these impacts are considered within Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement (Document A6.3.7).
- 3.11 An Outline Construction Traffic Management Plan (Outline CTMP) has been prepared that captures the principles of management and mitigation measures associated with this topic.
- 3.12 Table 3.6 identifies the status of discussions relating to this topic between the parties.

Table 3.6: Traffic and Transport.

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement (Document A6.3.7)			
Planning and Policy	Section 7.4 of Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement has identified all appropriate plans and policies relevant to traffic and transport in the application area and has given due regard to them within the assessments.	North Norfolk District Council do not wish to comment on whether all appropriate plans and policies relevant to traffic have been given due regard 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 the District Council	N/A
Baseline Environment	Sufficient primary and secondary data, as listed in Section 7.6 of Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement, has been collated to appropriately characterise the baseline environment (in Section 7.7 of Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement) to inform the EIA.	North Norfolk District Council do not wish to comment on whether sufficient primary or secondary data has been collated to appropriately characterise the baseline environment nor does it wish to comment on the future baseline 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 the District Council.	N/A
	The future baseline identified to inform the EIA in Section 7.7.10 of Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement is considered appropriate.		
Assessment methodology	The potential impacts identified in Section 7.11 of Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement represent a comprehensive list of potential impacts on traffic and transport resources from the construction, operation and maintenance and/or decommissioning of Hornsea Three.	North Norfolk District Council do not wish to comment 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 the District Council.	N/A

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
	The assessment methodology and maximum design scenarios, as outlined in Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement is appropriate based on the information presented in Volume 1, Chapter 3: Project Description of the Environmental Statement (Document A6.1.3).	North Norfolk District Council do not wish to comment 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 the District Council.	N/A
	The list of projects screened into the CEA in Section 7.12.1 of Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement are appropriate.	North Norfolk District Council do not wish to comment 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 the District Council.	N/A
Assessment conclusions	The assessment of potential effects on traffic and transport during the construction, operation and maintenance, and decommissioning of Hornsea Three in Section 7.11 of Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement is appropriate and accurate given the implementation of the measures adopted as part of Hornsea Three (outlined in Section 7.10 of Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement).	North Norfolk District Council do not wish to comment 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 the District Council.	N/A
	No further mitigation to those embedded measures identified in Section 7.10 of Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement, Outline Construction Traffic Management Plan (CTMP) (Document A8.2) and the Outline CoCP (Document A8.5) are necessary as a result of the assessment conclusions.	North Norfolk District Council do not wish to comment 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 the District Council.	N/A

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
	The assessment of potential cumulative impacts on traffic and transport in Section 7.13 of Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement is appropriate and accurate.	North Norfolk District Council do not wish to comment 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 the District Council.	N/A
<i>Draft Development Consent Order</i>			
Commitments / restrictions	The commitment to produce both an CTMP (Schedule 1, Part 3, Requirement 18 of the draft DCO), and a CoCP (Schedule 1, Part 3, Requirement 17 of the draft DCO), that must be approved by any relevant planning authority (including North Norfolk District Council) prior to the commencement of works are appropriate control measures for managing the potential effects on traffic and transport. The CTMP and CoCP will include all relevant embedded measures cited within Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement, as well as the Outline CTMP (Document A8.2) and Outline CoCP (Document A8.5).	Agreed subject to discussion with the Highway Authority to ensure no significant adverse impacts within North Norfolk.	Agreed

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
Outline Management Plans			
Traffic and transport management	<p>The management measures described in the Outline CTMP (Document A8.2) and Outline CoCP (Document A8.5) are appropriate to minimise impacts on traffic and transport.</p> <p>In particular, the acknowledgement in the Outline CTMP (document A8.2), that depending on the season of construction of individual onshore cable corridor sections or components, during peak holiday seasons the approved routing of HGVs documented in final CTMPs, if practical, may need to avoid routes marked on the Norfolk County Council Route Hierarchy Map. This need and form of this mitigation would be determined during the preparation of the final CTMPs post-consent.</p>	<p>NNDC note that 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>	Agreed
	<p>The commitment, made in section 6 of the Outline CTMP (A8.2) relating to highway condition surveys is appropriate. This states that video surveys will be undertaken of those local roads where it is considered that the passage of construction HGVs may cause deterioration of highways and that where it is agreed that damage has resulted from the passage of HGVs associated with construction work a financial contribution will be discussed with the HAs to cover the cost of repairing that damage</p>	<p>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>	Agreed

Noise and Vibration

- 3.13 Hornsea Three has the potential to impact upon noise and vibration, and these impacts are considered within Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement (Document A6.3.8). An Outline Code of Construction Practice (Outline CoCP) has been prepared that captures relevant management and mitigation measures associated with this topic.
- 3.14 Table 3.7 identifies the status of discussions relating to this topic between the parties.

Table 3.7: Noise and vibration.

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement (Document A6.3.8)			
Planning and Policy	Section 8.4 of Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement has identified all appropriate plans and policies relevant to noise and vibration in the application area and has given due regard to them within the assessments.	NNDC consider that the project has given regard to appropriate plans and policies relevant to noise and vibration in the application area.	Agreed
Baseline Environment	Sufficient primary and secondary data, as listed in Section 8.6 of Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement, has been collated to appropriately characterise the baseline environment (in Section 8.7 of Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement) to inform the EIA.	NNDC have no adverse comments in respect of the applicant's noise assessment methodology, including the baseline monitoring.	Agreed
	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 is considered appropriate.	NNDC have no adverse comments in respect of the future baseline.	
Assessment methodology	The potential impacts identified in Section 8.12 of Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement represent a comprehensive list of potential impacts on noise and vibration from the construction, operation and maintenance and/or decommissioning of Hornsea Three.	NNDC have no adverse comments in respect of the assessment methodology. Potential impacts of all stages have been identified.	Agreed

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
	<p>The assessment methodology and maximum design scenario as outlined in Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement is appropriate based on the information presented in Volume 1, Chapter 3: Project Description of the Environmental Statement (Document A6.1.3).</p> <p>The Applicant would note that a commitment to provide a Noise Management Plan for the onshore HVAC booster station, is provided at Issue Specific Hearing 4 (REP3-006), paragraph 5.6). This commitment is reflected in Requirement 21. Furthermore, the Applicant has amended Requirement 21 of the dDCO (Version 2 submitted at Deadline 4) to clarify the contents of the noise management plan. The noise management plan will set out the noise monitoring measures and will be agreed with the relevant local planning authority.</p>	<p>There remain some questions about the operational design criteria in respect of the operation of the booster station and tonal and frequency elements of the noise (including future monitoring). There is potential for frequency and 'hum' effects. The single decibel value noise rating level criteria 34 dB L_{Ar,Tr} may not describe and assess any tonal and hum issues.</p> <p>Section 8.12.2.29 regarding future monitoring of equipment operation <u>is</u> considered to be necessary to ensure any frequency and hum effects are identified and resolved.</p>	<p>In Discussion</p>
	<p>The list of projects screened into the CEA in Section 8.13.1 of Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement are appropriate.</p>	<p>Agreed</p>	<p>Agreed</p>

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
Assessment conclusions	<p>The assessment of potential effects on noise and vibration during the construction, operation and maintenance, and decommissioning of Hornsea Three in Section 8.12 of Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement is appropriate and accurate given the implementation of the measures adopted as part of Hornsea Three (outlined in Section 8.11 of Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement).</p> <p>The Applicant will continue to engage with NNDC in respect to noise matters relating to the onshore HVAC booster station raised in this SoCG.</p>	See Above	In Discussion
	<p>No further mitigation to those embedded measures identified in Section 8.11 of Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement the Outline CoCP (Document A8.5) are necessary.</p> <p>The Applicant will continue to engage with NNDC in respect to noise matters relating to the onshore HVAC booster station raised in this SoCG.</p>	<p>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.</p> <p>NNDC also agree with the construction noise management measures set out in Table 8.21.</p> <p>NNDC also agree with the Noise Management Plan in the fourth row of Table 8.21.</p> <p>However, there remain some questions about the operational design criteria in respect of the operation of the booster station and tonal and frequency elements of the noise (including future monitoring). There is potential for frequency and 'hum' effects. The single decibel value noise rating level criteria 34 dB LA_r,T_r may not describe and assess any tonal and hum issues.</p>	In Discussion

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
	The assessment of potential cumulative impacts on noise and vibration in Section 8.14 of Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement is appropriate and accurate.	Agreed	Agreed
Draft Development Consent Order			
Commitments / restrictions	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 North Norfolk District Council) prior to the commencement of works is an appropriate control measure for managing the potential effects of noise and vibration. The CoCP will include all relevant embedded measures cited within Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement, as well as the Outline CoCP (Document A8.5).	Agreed	Agreed
Outline Management Plans			
Noise and Vibration management	The management measures described to minimise impacts on noise and vibration during construction in the Outline CoCP (Document A8.5) are appropriate.	The management 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.	Agreed

Air Quality

- 3.15 Hornsea Three has the potential to impact upon air quality, and these impacts are considered within Volume 3, Chapter 9: Land Use and Recreation of the Environmental Statement (Document A6.3.9). An Outline Code of Construction Practice (Outline CoCP) has been prepared that captures all relevant management and mitigation measures associated with this topic.
- 3.16 Table 3.8 identifies the status of discussions relating to this topic between the parties.

Table 3.8: Air Quality.

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
Volume 3, Chapter 9: Air Quality (Document A6.3.9)			
Planning and Policy	Section 9.4 of Volume 3, Chapter 9: Air Quality of the Environmental Statement has identified all appropriate plans and policies relevant to air quality in the application area and has given due regard to them within the assessments.	Agreed	Agreed
Baseline Environment	Sufficient primary and secondary data, as listed in Section 9.6 of Volume 3, Chapter 9: Air Quality of the Environmental Statement, has been collated to appropriately characterise the baseline environment (in Section 9.7 of Volume 3, Chapter 9: Air Quality of the Environmental Statement) to inform the EIA.	Agreed	Agreed
	The future baseline identified to inform the EIA in Section 9.7.4 of Volume 3, Chapter 9: Air Quality of the Environmental Statement is considered appropriate.		
Assessment methodology	The potential impacts identified in Section 9.11 of Volume 3, Chapter 9: Air Quality of the Environmental Statement represent a comprehensive list of potential impacts on air quality from the construction, operation and maintenance and decommissioning of Hornsea Three.	Agreed	Agreed

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
	The assessment methodology and maximum design scenario, as outlined in Volume 3, Chapter 9: Air Quality of the Environmental Statement is appropriate based on the information presented in Volume 1, Chapter 3: Project Description of the Environmental Statement (Document A6.1.3).	Agreed	Agreed
	The list of projects screened into the CEA in Section 9.12.1 of Volume 3, Chapter 9: Air Quality of the Environmental Statement are appropriate.	Agreed	Agreed
Assessment conclusions	The assessment of potential effects on air quality during the construction, operation and maintenance, and decommissioning of Hornsea Three in Section 8.11 of Volume 3, Chapter 9: Air Quality of the Environmental Statement is appropriate and accurate given the implementation of the measures adopted as part of Hornsea Three (outlined in Section 9.10 of Volume 3, Chapter 9: Air Quality of the Environmental Statement).	Agreed	Agreed
	No further mitigation to those embedded measures identified in Section 9.10 of Volume 3, Chapter 9: Air Quality of the Environmental Statement and the Outline CoCP (Document A8.5) are necessary as a result of the assessment conclusions.	NNDC consider that, in respect of construction activities, the air quality impacts are unlikely to be an issue so as long as the agreed Code of Construction Practice is followed.	Agreed
	The assessment of potential cumulative effects on air quality in Section 9.13 of Volume 3, Chapter 9: Air Quality of the Environmental Statement is appropriate and accurate.	Agreed	Agreed

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
<i>Draft Development Consent Order</i>			
Commitments / restrictions	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 North Norfolk District Council) prior to the commencement of works is an appropriate control measure for managing potential effects on air quality. The CoCP will include all relevant embedded measures cited within Volume 3, Chapter 9: Air Quality of the Environmental Statement, as well as the Outline CoCP (Document A8.5).	Agreed	Agreed
<i>Outline Management Plans</i>			
Air Quality management	The management measures described to minimise impacts on air quality during construction in the Outline CoCP (Document A8.5) are appropriate.	Agreed	Agreed

Socio-economics

- 3.17 Hornsea Three has the potential to impact upon socio-economics, and these impacts are considered within Volume 3, Chapter 10: Socio-economics of the Environmental Statement (Document A6.3.10).
- 3.18 Table 3.9 identifies the status of discussions relating to this topic between the parties.

Table 3.9: Socio-economics.

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
Volume 3, Chapter 10: Socio-economics (Document A6.3.10)			
Planning and Policy	Section 10.4 of Volume 3, Chapter 10: Socio-economics of the Environmental Statement has identified all appropriate plans and policies relevant to socio-economics in the application area and has given due regard to them within the assessments.	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. Para 10.4.2.1 should be amended to delete "(2012)" from the first bullet.	Agreed

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
Baseline Environment	<p>Sufficient primary and secondary data, as listed in Section 10.6 of Volume 3, Chapter 10: Socio-economics of the Environmental Statement, has been collated to appropriately characterise the baseline environment (in Section 10.7 of Volume 3, Chapter 10: Socio-economics of the Environmental Statement) to inform the EIA.</p> <p>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>	<p>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>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>The conclusion at para 10.7.2.47 which suggests that '<i>offshore wind farm developments generate very limited, or no negative impact on tourist and recreational users during the construction and O&M phases</i>' is contested by NNDC.</p> <p>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 North Norfolk District Council 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>	Under Discussion

	<p>The future baseline identified to inform the EIA in Section 10.7.3 of Volume 3, Chapter 10: Socio-economics of the Environmental Statement is considered appropriate.</p>	<p>NNDC have provided evidence as to the value of tourism to the economy of North Norfolk. However, it is hard to predict or quantify with any certainty the actual impacts of the construction of the proposed development upon visitor numbers 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 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>	
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Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
		<p>Whilst the position of the applicant is noted, NNDC would welcome further discussion with the applicant as to possible strategies to address the likely adverse impact of development on the local economy.</p>	
<p>Assessment methodology</p>	<p>The potential impacts identified in Section 10.11 of Volume 3, Chapter 10: Socio-economics of the Environmental Statement represent a comprehensive list of potential impacts on socio-economics from the construction, operation and maintenance and decommissioning of Hornsea Three.</p> <p>The Applicant will continue to engage with NNDC in respect to impacts relating to tourism.</p>	<p>The conclusion at para 10.7.2.47 which suggests that '<i>offshore wind farm developments generate very limited, or no negative impact on tourist and recreational users during the construction and O&M phases</i>' is contested by NNDC.</p> <p>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. Para 10.11.1.132 concludes that '<i>No socio-economic and tourism monitoring to test the predictions made within the construction phase is considered necessary</i>'. 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>Under Discussion</p>

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
	<p>The assessment methodology and maximum design scenario, as outlined in Volume 3, Chapter 10: Socio-economics of the Environmental Statement, is appropriate based on the information presented in Volume 1, Chapter 3: Project Description of the Environmental Statement (Document A6.1.3).</p> <p>The Applicant will continue to engage with NNDC in respect to the assessment methodology applied for socio-economics.</p>	See Above	Under Discussion
	<p>The list of projects screened into the CEA in Section 10.12.1 of Volume 3, Chapter 10: Socio-economics of the Environmental Statement are appropriate.</p> <p>The Applicant will continue to engage with NNDC in respect to impacts relating to tourism.</p>	Agreed	Agreed

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
Assessment conclusions	<p>The assessment of potential effects on socio-economics during the construction, operation and maintenance, and decommissioning of Hornsea Three in Section 10.11 of Volume 3, Chapter 10: Socio-economics of the Environmental Statement is appropriate and accurate.</p> <p>This considers the economics of beaches in terms of the tourism sector, setting out the tourism FTE employment and assessing the impact of Hornsea Three construction on offshore and onshore coastal tourism.</p> <p>The Applicant will continue to engage with NNDC in respect to impacts relating to tourism.</p>	<p>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. See Above</p>	<p>Under discussion</p>
	<p>The assessment of potential cumulative impacts on socio-economics in Section 10.13 of Volume 3, Chapter 10: Socio-economics of the Environmental Statement is appropriate and accurate.</p>	<p>Whilst NNDC are currently considering three NSIP wind farm schemes whose cables pass through North Norfolk District, it is considered unlikely that the cumulative impacts of these specific schemes on socio-economics would be significant. The two other NSIP schemes are using HVDC transmission which has helped to reduce the onshore impacts through North Norfolk. The use of HVDC transmission for Hornsea Project Three would help reduce the impact of construction on the local tourism and agricultural economy.</p>	<p>Agreed</p>

Discussion Point	The Applicant's Position	North Norfolk District Council's Position	Final Position
<i>Draft Development Consent Order</i>			
Commitments / restrictions	<p>The commitment to produce a skills and employment plan (Schedule 1, Part 3, Requirement 22 of the draft DCO) to be approved by the relevant planning authority is appropriate.</p> <p>The Applicant will continue to engage with NNDC in respect to impacts relating to socio-economics and tourism.</p>	<p>NNDC consider this requirement is unlikely to benefit North Norfolk and seems tailored towards the ports to be used during O&M phase.</p> <p>Separate mitigation is suggested to be secured to quantify and understand the impact of construction on tourism spend within North Norfolk.</p>	Under Discussion

4. Summary

- 4.1 This SoCG has been developed with North Norfolk District Council to capture those matters agreed, under discussion and not agreed in relation to marine processes, ecology and nature conservation, landscape and visual resources, land use and recreation, traffic and transport, and socio-economics.
- 4.2 Agreement has been reached on many matters. Matters which remain under discussion, include:
- Landfall construction methodology (NNDC have preference for using HDD rather than open-cut trenching);
 - 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.
- 4.3 Both parties have confidence that agreement on many outstanding matters can be reached through ongoing engagement.