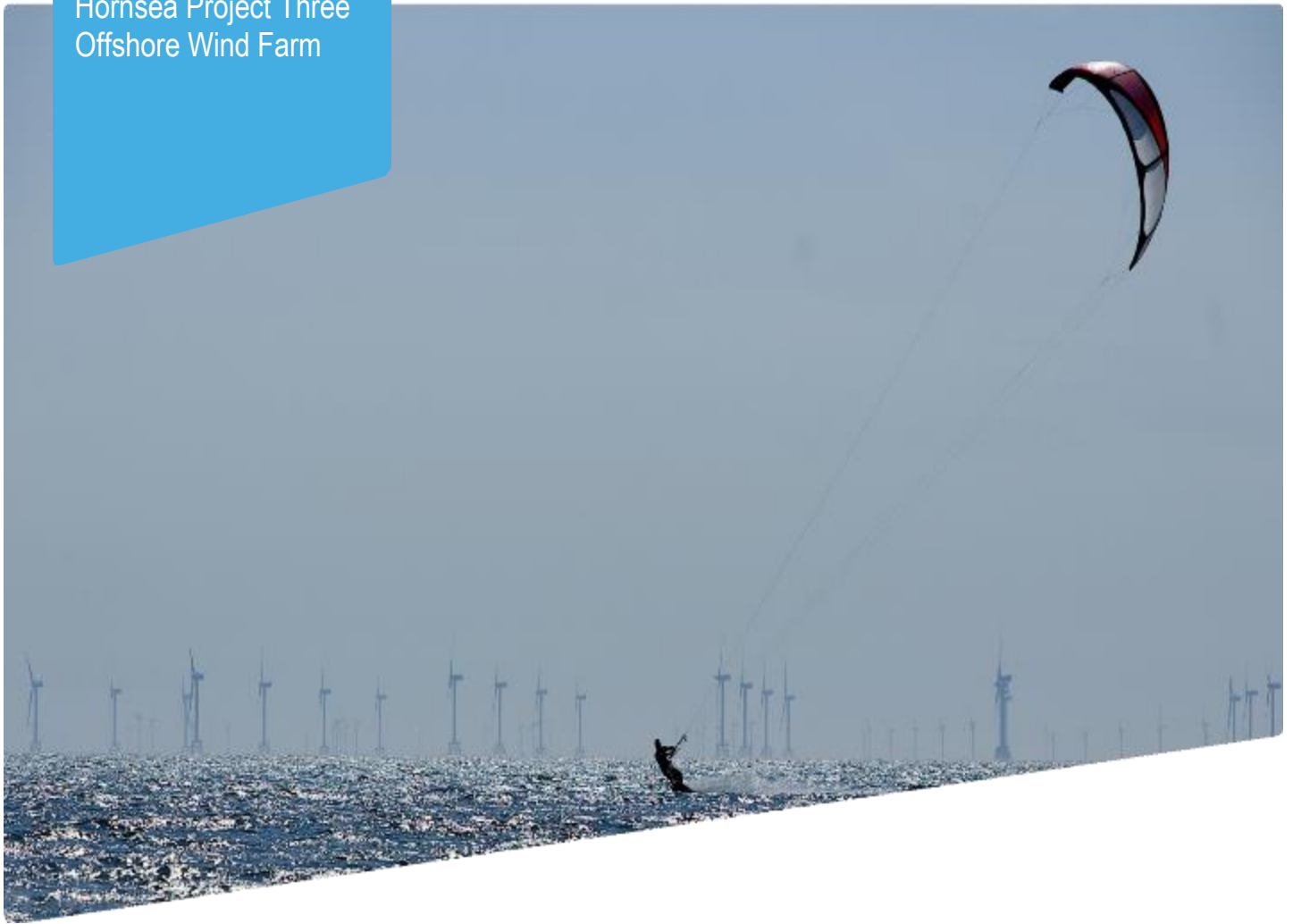


Hornsea Project Three
Offshore Wind Farm



Hornsea Project Three Offshore Wind Farm

Applicant's comments on Written Representations and
Responses submitted by Interested Parties at Deadline 7

Date: 22nd March 2019

Hornsea 3
Offshore Wind Farm

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1. Introduction

1.1 Following further submissions of Written Representations by Interested Parties at Deadline 7, the Applicant has taken the opportunity to review each of the Written Representations received by the Planning Inspectorate. Details of the Applicant's responses to those representations that required response are set out within this document in subsequent sections below.

2. Applicant's Comments on Written Representations

Natural England's comments on the Report on the Implications for European Sites (RIES) (REP7-065)

Response

With respect to the North Norfolk Sandbanks and Saturn Reef (NNSSR) SAC and the Wash and North Norfolk Coast (WNNC) SAC, the Applicant has noted consistency between statements made by Natural England in response to the RIES and those made in REP7-067 and REP7-066. A Position Statement on the NNSSR SAC and WNNC SAC will be submitted at Deadline 9 which will be based on those Natural England's Deadline 7 responses (i.e. REP7-067 and REP7-066) and therefore the Applicant would direct the ExA to this document when considering the Natural England comments on the RIES. The Applicant has provided responses and clarifications below which are not covered by the Position Statement.

Natural England's Comments	Applicant's Response
Comments on Section 2. Likely Significant Effects - Screening	
<p>Paragraph 2.7</p> <p>However, we also consider that there may be additional Special Protection Areas with features that have connectivity to the development Zone that have not been captured. We note that the applicant has focussed their considerations on connectivity in the breeding season. However, there may be an impact pathway for a number of species in the non-breeding season. To establish this, an assessment should be conducted using the Biologically Defined Minimum Population Scales BDMPS [a copy of this submitted at Deadline 7] of the species present at the</p>	<p>The Applicant considered the impact across all seasons in the HRA Screening Report (APP-052) and in APP-053. The approach presented in APP-053 follows Natural England guidance in relation to the screening of breeding bird features in the non-breeding season (JNCC and Natural England, 2013) and includes consideration of BDMPS.</p>

Natural England's Comments	Applicant's Response
project site in the season under-consideration	
Comments on Section 3 Detailed Comments	
<p>Comment 3.1, Section 3.0.9</p> <p>Natural England reiterates our concerns that LSE was ruled out on the basis of less than 1% baseline mortality alone.</p> <p>Firstly, reaching this conclusion requires a level of analysis and is therefore better captured within an appropriate assessment.</p> <p>Secondly, the impacts on these features have not been considered in-combination.</p> <p>[N.B. Natural England advise that features are screened in to the Appropriate Assessment where there is an impact pathway, but the level of assessment undertaken at that stage should be proportionate.</p> <p>For example, where it is concluded that the impact is less than 1% of baseline mortality, it may not be necessary to undertake a Population Viability Analysis, but the totals should be included in the in combination assessment.</p>	<p>The term used in HRA Screening is Likely Significant Effect. The Applicant has presented information and analyses that clearly indicate, for certain species, that any effect is unlikely to be significant and therefore LSE can be ruled out.</p> <p>The Applicant would further conclude that where a negligible impact is identified that an in-combination assessment would be unnecessary as any contribution from Hornsea Three would not materially alter the current in-combination impact.</p>
<p>Comment 3.2, Section 3.1.1</p> <p>Natural England's concerns in relation to the Applicant's approach to LSE are three-fold:</p> <ul style="list-style-type: none"> · Firstly, we have concerns that the applicants approach to LSE screening has resulted in features being screened out on the basis of low level of impact 'alone', without consideration of that impact in-combination. · Secondly, with respect to Marine SPAs, we do not consider that that the impact pathways within the non-breeding season have been adequately assessed. · Thirdly, where baseline data is incomplete, a more precautionary approach should be taken to LSE screening. (i.e. numbers of birds present in the array area 	<p>The Applicant highlights that impacts occurring in the non-breeding season have been considered both in APP-052 and APP-053. An example of this is the inclusion of guillemot, razorbill and puffin at FFC SPA with an LSE only identified in non-breeding seasons.</p> <p>The screening process conducted in APP-052 did not use site-specific data collected as part of baseline aerial surveys at Hornsea Three as the screening exercise was undertaken before the completion of the aerial survey programme. For the offshore cable route, the Applicant has used publically available data used to support the designation of the Greater Wash SPA to identify features that may occur along the offshore cable route. It is unclear what further information, that would have provided better information,</p>

Natural England's Comments	Applicant's Response
<p>in the winter period, features present along the cable route in W&NNC SPA etc.). Natural England highlights that alongside the conclusions disputed on 6 sites, there are also likely to be addition sites/features that have not been included on this list.</p>	<p>could have been used by the Applicant for screening in relation to the export cable corridor.</p>
<p>Comments on Section 4 Comments on Table 3.1: Sites/features for which the Applicant has identified likely significant effects</p>	
<p>Comment 4.2 Coquet Island SPA: Natural England expected that consideration would be given to the potential impact pathway for other features of the SPA (including the assemblage).</p>	<p>The citation for Coquet Island SPA includes the following qualifying features:</p> <ul style="list-style-type: none"> - Common tern; - Arctic tern; - Roseate tern; and - Sandwich tern; <p>In addition, a breeding bird assemblage includes:</p> <ul style="list-style-type: none"> - Puffin; and - Black-headed gull. <p>There is no connectivity between Hornsea Three and any of these features in the breeding season based on foraging range as discussed in paragraph 5.3.26 of APP-052.</p> <p>There is considered to be no connectivity between Sandwich tern and Roseate tern and Hornsea Three in any non-breeding season. Collision risk modelling conducted for migratory common tern and Arctic tern (APP-109) calculated less than one collision for both species and therefore no LSE was identified.</p> <p>Further consideration for the potential for LSE on the puffin feature of Coquet Island SPA in the non-breeding season was provided in APP-053 and REP4-081 with no LSEs identified.</p>
<p>Comment 4.3</p>	<p>The citation for the Farne Islands SPA includes the following qualifying</p>

Natural England's Comments	Applicant's Response
<p>Farne Islands SPA :</p> <p>Natural England expected that consideration would be given to the potential impact pathway for other features of the SPA (including the assemblage).</p>	<p>features:</p> <ul style="list-style-type: none"> - Common tern; - Arctic tern; - Roseate tern; - Sandwich tern; and - Guillemot <p>In addition a breeding bird assemblage includes:</p> <ul style="list-style-type: none"> - Puffin; - Cormorant; - Shag; and - Kittiwake. <p>There is no connectivity between Hornsea Three and any of these features in the breeding season based on foraging range as discussed in paragraph 5.3.26 of APP-052 with Figure 5.10 and Figure 5.12 illustrating this for kittiwake and guillemot, respectively.</p> <p>There is considered to be no connectivity between cormorant, shag, Sandwich tern and Roseate tern and Hornsea Three in any non-breeding season.</p> <p>Collision risk modelling conducted for migratory common tern and Arctic tern (APP-109) calculated less than one collision for both species and therefore no LSE was identified.</p> <p>Further consideration for the potential for LSE on the kittiwake, guillemot and puffin features of the Farne Islands SPA in the non-breeding season was provided in APP-053 and REP4-081 with no LSEs identified.</p>

Natural England's Comments	Applicant's Response
<p>Comment 4.4 Fourth Islands SPA: Natural England expected that consideration would be given to the potential impact pathway for other features of the SPA (including the assemblage).</p>	<p>The citation for the Forth Islands SPA includes the following qualifying features:</p> <ul style="list-style-type: none"> - Gannet; - Shag; - Lesser black-backed gull; - Sandwich tern; - Arctic tern; - Roseate tern; - Common tern; and - Puffin. <p>In addition a breeding bird assemblage includes:</p> <ul style="list-style-type: none"> - Cormorant; - Kittiwake; - Herring gull; - Guillemot; and - Razorbill. <p>There is no connectivity between Hornsea Three and any of these features in the breeding season based on foraging range as discussed in paragraph 5.3.26 of APP-052 with Figure 5.10, Figure 5.12, Figure 5.13, Figure 5.14 and Figure 5.15 illustrating this for kittiwake, guillemot, razorbill, puffin and herring gull respectively.</p> <p>There is considered to be no connectivity between cormorant, shag, Sandwich tern and Roseate tern and Hornsea Three in any non-breeding season.</p>

Natural England's Comments	Applicant's Response
	<p>Collision risk modelling conducted for migratory common tern and Arctic tern (APP-109) calculated less than one collision for both species and therefore no LSE was identified.</p> <p>Further consideration for the potential for LSE on the gannet, kittiwake, lesser black-backed gull, guillemot, razorbill and puffin features of the Farne Islands SPA in the non-breeding season was provided in APP-053 and REP4-081 with no LSEs identified. No LSE was identified for herring gull in the non-breeding season in APP-052.</p>
<p>Comment 4.6</p> <p>Greater Wash SPA: Little tern and little gull should also be screened in. Potential impact pathways on these SPA features include displacement and disturbance impacts, as well as indirect effects on prey availability associated with construction/laying of the cable.</p>	<p>Little gull is not considered vulnerable to displacement or disturbance impacts by Garthe and Hüppop (2004) and therefore there is no impact pathway for these impacts as suggested by Natural England.</p> <p>The Applicant disagrees that an LSE should be identified for little tern and little gull. The reasoning for this is discussed in APP-053 for little gull and APP-053 and REP4-081 for little tern. In contrast, Natural England have not set out any detailed reasoning or evidence for contending that these species should be screened in.</p>
<p>Comments on Section 6 - Comments on Annex 3: Stage 1 Matrices: Screening for Likely Significant Effect</p>	
<p>Comment 6.4</p> <p>We are unclear about the commentary in supporting note c.</p> <p>Generally, Natural England considers that there would be no collision risk for Auk species and fulmar, but there may be a pathway for other assemblage species such as kittiwake and herring gull and lesser black backed gull. These species should be considered in the appropriate assessment.</p>	<p>The Applicant disagrees that lesser black-backed gull and herring gull require consideration at the Appropriate Assessment stage with APP-052, APP-053 and REP1-189 presenting clear evidence that there is no LSE for these species in any season. If these species were to be included in the Appropriate Assessment the same evidence as presented in APP-052, APP-053 and REP1-189 would lead to a conclusion of no adverse effect on site integrity.</p> <p>See also response to comment 4.2.</p>

Natural England's Comments	Applicant's Response
<p>Comment 6.5</p> <p>Reiterating Natural England's advice in relation to the test of Likely Significant Effect being a coarse filter (see section 2 above), Natural England would recommend that barrier effects were carried through to appropriate assessment</p>	<p>The Applicant disagrees with this comment with barrier effects having been considered in APP-052 and no LSE being identified for any species.</p> <p>If these species were to be included in the Appropriate Assessment the same evidence as presented in APP-052 would lead to a conclusion of no adverse effect on site integrity.</p>
<p>Comment 6.9</p> <p>Generally, Natural England considers that there would be no collision risk for Auk species and fulmar, but there may be a pathway for other assemblage species such as kittiwake. These species should be considered in the appropriate assessment.</p>	<p>See Applicant's response to comment 4.3.</p> <p>If these species were to be included in the Appropriate Assessment the same evidence as presented in APP-052, APP-053, APP-109 and REP4-081 would lead to a conclusion of no adverse effect on site integrity.</p>
<p>Comment 6.10</p> <p>Reiterating Natural England's advice in relation to the test of Likely Significant Effect being a coarse filter (see section 2), Natural England would recommend that barrier effects were carried through to appropriate assessment</p>	<p>The Applicant disagrees with this comment with barrier effects having been considered in APP-052 and no LSE being identified for any species.</p> <p>If these species were to be included in the Appropriate Assessment the same evidence as presented in APP-052 would lead to a conclusion of no adverse effect on site integrity.</p>
<p>Comment 6.16</p> <p>Reiterating Natural England's advice in relation to the test of Likely Significant Effect being a coarse filter (see para XX), Natural England would recommend that barrier effects were carried through to appropriate assessment and that supporting note i is more appropriate at that stage.</p>	<p>The Applicant disagrees with this comment with barrier effects having been considered in APP-052 and no LSE being identified for any species.</p> <p>If this impact were to be included in the Appropriate Assessment the same evidence as presented in APP-052 would lead to a conclusion of no adverse effect on site integrity for all features.</p>
<p>Comment 6.18</p> <p>Natural England would consider that there is an impact pathway for each of these species regarding prey availability, disturbance and displacement and consequently in- combination impacts. Therefore we agree that all three species</p>	<p>The Applicant has provided information in APP-053 and REP4-081 that clearly indicates there would be no LSE on the common tern and little tern features of the Greater Wash SPA</p> <p>If these species were to be included in the Appropriate Assessment in relation to these impacts the same evidence as presented in APP-053 and</p>

Natural England's Comments	Applicant's Response
should be considered within the appropriate assessment.	REP4-081 would lead to a conclusion of no adverse effect on site integrity.
<p>Comment 6.19</p> <p>“NE has also raised concerns about the appropriateness of the population size used in the migratory seabird assessment for little gull [REP1-211]. The Applicant has provided an additional screening document at deadline 4 in response to these concerns [REP4-081].”</p> <p>The applicant has clearly identified an impact pathway to undertake this analysis. Natural England therefore considers that little gull should be screened in to the AA.</p>	<p>The purpose of HRA Screening is to identify Likely Significant Effects. The collision risk modelling undertaken for little gull (APP-109) clearly indicates that any effect will not be significant and therefore an LSE was ruled out for the species as a feature of the Greater Wash SPA.</p> <p>If little gull were to be included in the Appropriate Assessment the same evidence as presented in APP-109 would lead to a conclusion of no adverse effect on site integrity.</p>
Comments on Annex 4: Stage 2 Matrices: Adverse Effect on Integrity	
Stage 2 Matrix 1: North Norfolk Sandbanks and Saturn Reef SAC	
<p>7.1 Table: Changes to water quality (incl. Supporting note i)</p> <p>It seems from the supporting note that only accidental pollution has been considered as part of the assessment of potential changes to water quality.</p> <p>Natural England would highlight that there may be other potential impacts on water quality as a result of the activities proposed within the site such as increased levels of suspended sediment which should be considered within this assessment for completeness.</p>	<p>The Applicant agrees that increases in suspended sediment concentrations should be considered within this assessment for completeness, although the conclusion (i.e. adverse effects on integrity can be excluded) is unchanged. For the NNSSR SAC, this impact is fully assessed within in the RIAA (paragraphs 5.6.1.19 et see; APP-051).</p>
<p>7.7 Supporting note f</p> <p>Conservation Objective</p> <p>It should be noted that the conservation objectives for both features (sandbanks and reef) are to recover to favourable condition.</p> <p>Cable protection</p> <p>NE/JNNC advise there is currently little or no evidence to provide certainty beyond</p>	<p>The Applicant will be providing a Position Statement on the NNSSR SAC to be submitted at Deadline 9 and would direct the ExA to that document when considering the comments from NE on the RIAA.</p> <p>The Applicant would note that as set out in paragraph 5.33 of the Applicant's written summary of Issue Specific Hearing 2 (REP3-004), the rock grading proposed (i.e. mean diameter of 100 mm, maximum diameter 250 mm) is a standard grading widely deployed on projects or protection works, including</p>

Natural England's Comments	Applicant's Response
<p>reasonable scientific doubt that cable protection can be removed without causing a further impacts on designated site features, based on the technology that is currently available. [See Annex C and D to NE's D7 Submission]</p> <p>It is recognised that new technologies may develop over the operational lifetime of the project and we would welcome the commitment to explore the feasibility of removal at decommissioning, but for the purposes of the HRA, the impact of the cable protection remaining in situ permanently should be assessed.</p> <p>Cable protection would therefore represent the permanent loss of reef feature in this context.</p> <p>Cable protection requirement</p> <p>The applicant has set out a maximum design parameter for cable protection within designated sites, which equates to cable protection across 10% of the total length of cable within the site.</p> <p>This is presented in the draft DCO as an overall volume of cable protection to potentially be used within the designated site.</p> <p>It is the applicant's intention that this total volume of cable protection will be 'available' throughout the operational lifetime of the project.</p> <p>The applicant is also seeking an additional 25% on top of the volume of cable protection requested for use within the site for replenishment.</p> <p>NE/JNCC's points are as follows:</p> <ul style="list-style-type: none"> - The impacts are completely on site feature - The volume/extent of cable protection sought within the site is not an insignificant amount. - The use of cable protection would result in a permanent loss/change to the feature. 	<p>the Applicant's own projects. There are several design methods to rock design height, slope, width and density. Modelling of storm events have shown that the rock might reshape but will not be dispersed. This rock grading is sufficiently durable in a dynamic environment, and the Applicant is not aware of issues regarding dispersal of the use of rock protection of the grading proposed.</p>

Natural England's Comments	Applicant's Response
<p>- We acknowledge that based on previous cable installations (requiring c6% of their cable lengths to be protected) the Applicant has presented reasonable justification for the WCS of 10% along the entire export cable length requiring cable protection and this could meet EIA requirements. Given that the applicant has presented this as a conservative estimate, and based over a calculation over a much wider area, it is unclear whether this assumption is directly applicable to this site.</p> <p>This is important because cable protection will have a permanent impact on the site and the volume required can make a big difference in relation to the outcome of an appropriate assessment.</p> <p>- The 10% figure has been represented as a volume within the draft DCO, and it appears that this volume would remain the permitted volume regardless of the length of cable that is actually installed.</p> <p>Impacts on designated sites should always be avoided/reduced/ mitigated as far as possible.</p> <p>- Whilst NE/JNCC consider that the requirement for additional cable protection across the lifetime of the project should be considered within the ES, we agree with the MMOs position that the implications of the impact on designated site features over the life time of the project can't be assessed with sufficient certainty. Therefore we also agree that the volume of cable protection permitted in the DCO should relate only to the amount required at construction and that any additional requirement should be dealt with through a separate marine licence.</p> <p>Please see ANNEX C of our D7 submission for further discussion</p> <p>Potential for reef to colonise artificial habitats.</p> <p>NE/JNCC's current position is that reef occurring on artificial habitats would not qualify as Annex I feature. (Although we recognise this view may be subject to</p>	

Natural England's Comments	Applicant's Response
<p>change in the future as more evidence becomes available).</p> <p>Please see ANNEX B of our D7 submission for further discussion</p> <p>Sensitive Cable and Scour Protection</p> <p>NE/JNCC welcome the applicant's proposal to trail the use of 'sensitive scour protection' within the designated site. However, this would still require the deposition of material from outside the site so will continue to represent permanent loss/change to the feature.</p> <p>It is also noted in [REP1 -216] that the size of the sensitive protection, may not be similar to the surrounding habitat as it more likely to winnow away and doesn't provide adequate protection.</p>	
<p>Stage 2 Matrix 3: The Wash and North Norfolk Coast SAC</p>	
<p>7.14 Notes</p> <p>Adequacy of the baseline</p> <p>In the Applicant's original proposals, the cable route did not cross through the W&NNC SAC. Consequently their survey campaign did not include this site and they relied on extrapolated data from outside of the site and historic data from within the site (not within the development zone) in order to characterise the cable corridor.</p> <p>In response to feedback, the Applicant collected drop down video footage at six locations along the cable corridor. Natural England considers that whilst this provides information on the habitats present at the survey locations, without supporting geotechnical and geophysical information, it is not possible to establish the likely extent of features within the cable corridor. Therefore NE does not consider that the baseline has been adequately characterised at this site.</p>	<p>As set out in Figure 4.21 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-059) of the Environmental Statement, the offshore cable corridor assessed at PEIR stage did coincide with the WNNC SAC. As such, site specific surveys were undertaken within the WNNC SAC, as agreed with the Expert Working Group during the pre-application phase (see Figure 2.3 of Volume 2, Chapter 2: Benthic Ecology of the Environmental Statement; APP-062). However, the Applicant accepts that the nearshore re-route did result in an increase in the length of the offshore cable corridor from approximately 7 km to 11 km (see Table 2.1 of REP1-138).</p> <p>In relation to the adequacy of the baseline, the Applicant's position is that a robust and detailed baseline has been provided to inform the RIAA. The Applicant will be providing a Position Statement on the WNNC SAC, which will be submitted at Deadline 9, and further detail with regard to the baseline</p>

Natural England's Comments	Applicant's Response
<p>Feature condition</p> <p>Please note that the following Annex I features are in unfavourable condition : sandbanks slightly covered by water all of the time, mudflats, reefs, LSIB.s</p> <p>Including (but not exclusively) circalittoral rock which is one of the subfeatures of reef and mixed sediment which is one of the subfeatures of sandbanks. Therefore, recovery of these features should not be hindered by the current development</p> <p>[Clarification: Natural England's advice is that the assessment should be made in relation to the site features against their conservation objectives.]</p>	<p>is presented in that document.</p>
<p>7.19 Supporting note f</p> <p>The comments made in relation to supporting note f would appear to be equally applicable to reef.</p> <p>Conclusion in relation to 10% cable protection</p> <p>The applicant's clarification note [REP1-138] provided a rationale for their calculation, but this did not allay Natural England's concerns in relation to the assessment of impacts on designated features.</p> <p>As highlighted in relation to supporting note a, the Applicant's assessment of their cable protection requirement has not been based on site level considerations.</p> <p>As cable protection represents a permanent impact on the designated site, it is important that its use is minimised.</p> <p>Potential for reef to colonise artificial habitats.</p> <p>NE/JNCC's current position is that reef occurring on artificial habitats would not qualify as Annex I feature. (Although we recognise this view may be subject to change in the future as more becomes available).</p> <p>Sensitive Cable and Scour Protection</p> <p>NE/JNCC welcome the applicant's proposal to trail the use of 'sensitive scour</p>	<p>The Applicant would note that as set out in paragraph 5.33 of the Applicant's written summary of Issue Specific Hearing 2 (REP3-004), the rock grading proposed (i.e. mean diameter of 100 mm, maximum diameter 250 mm) is a standard grading widely deployed on projects or protection works, including the Applicant's own projects; with a similar rock grading proposed for Race Bank in the same designated site. There are several design methods to rock design height, slope, width and density. Modelling of storm events have shown that the rock might reshape but will not be dispersed. This rock grading is sufficiently durable in a dynamic nearshore environment, and the Applicant is not aware of issues regarding dispersal of the use of rock protection of the grading proposed.</p>

Natural England's Comments	Applicant's Response
<p>protection' within the designated site. However, this would still require the deposition of material from outside the site so will continue to represent permanent loss/change to the feature. It is also noted in [REP1 -216] that the size of the sensitive protection, may not be similar to the surrounding habitat as it more likely to winnow away and doesn't provide adequate protection</p>	
<p>Stage 2 Matrix 4: Coquet Island SPA</p>	
<p>Comment 7.22 Natural England considers that barrier effects should be considered at the Appropriate Assessment phase</p>	<p>The Applicant disagrees with this comment with barrier effects having been considered in APP-052 and no LSE being identified for any species If this impact were to be included in the Appropriate Assessment the same evidence as presented in APP-052 would lead to a conclusion of no adverse effect on site integrity for all features.</p>
<p>Stage 2 Matrix 5: Farne Islands SPA</p>	
<p>Comment 7.25 Natural England considers that barrier effects should be considered at the Appropriate Assessment phase</p>	<p>The Applicant disagrees with this comment with barrier effects having been considered in APP-052 and no LSE being identified for any species If this impact were to be included in the Appropriate Assessment the same evidence as presented in APP-052 would lead to a conclusion of no adverse effect on site integrity for all features.</p>
<p>Stage 2 Matrix 6: Flamborough and Filey Coast SPA</p>	
<p>Comment 7.29 It is unclear if the view present at the start of this note is that of the Applicant or the Planning Inspectorate. The Applicant revised their PVA figures at REP4-092. Based on Natural England's assessment of these, we do not agree with the statement that " levels of in</p>	<p>At the time of production REP1-135 took account of Natural England's advice as communicated to the Applicant as part of EWG meetings undertaken as part of the Evidence Plan process. Following the publication of REP1-135 Natural England provided further advice which contained additional concerns not previously communicated to the Applicant. A further</p>

Natural England's Comments	Applicant's Response
<p>combination mortality predicted in Table 7.39 of [APP-051] would not be sufficient for the population to decline below the SPA citation numbers for this species".</p> <p>Natural England would reiterate that and Adverse Effect on Integrity on Kittiwake at Flamborough and Filey Coast SPA cannot be ruled out based on the in-combination totals of consented plans and projects.</p> <p>It is also unclear which citation levels are being referred to and it should also be noted that the Conservation Objectives for kittiwake at FFC SPA remains to restore to the original citation population figure for Flamborough Head and Bempton Cliffs SPA.</p> <p>The PVA modelling within APP-051 does include some adjustment for "as built scenarios". It also includes NAF, but these are not figures that Natural England is in agreement with for Hornsea 3.</p> <p>"The Applicant submitted a revised PVA at deadline 1 [REP1-135] but this did not allay our concerns [REP3-075]"</p> <p>The revised PVA [REP1-135] did not address Natural England's Advice. Natural England remain concerned that there is potential for AEol. It should also be noted that the Applicant has submitted an updated version of their PVA [REP4-092].</p> <p>The Applicant's Revised In combination Assessment</p>	<p>submission in relation to PVA modelling was made in REP4-092 to address some of the additional concerns raised by Natural England.</p>
<p>Comment 7.29</p> <p>The Applicant's Revised In combination Assessment As an increasing number of projects are consented, the risk of in combination/cumulative impacts reaching significant levels has increased. (As highlighted above, Adverse Effect on Integrity on Kittiwake at Flamborough and Filey Coast SPA cannot be ruled out based on the in-combination totals of consented plans and projects, so projects that contribute to this total would be considered to be contributing AEol irrespective of the scale.) Most offshore windfarms are consented using a Rochdale Envelope</p>	<p>The Applicant has not presented an assessment that includes the 'most likely scenario' for projects considered cumulatively or in-combination. This is clearly communicated in REP1-148. REP1-148 does not present an assessment and where revised numbers are presented these represent the worst case scenario for all projects based on the information presented in relation to further development in REP1-148.</p>

Natural England's Comments	Applicant's Response
<p>Approach, and the assessments of impact are based on their maximum design scenario, to represent a worst case scenario in terms of impact. It is therefore possible that the "as built" impacts will be different to those assessed. The Applicant has presented an in combination assessment which revises the figures presented by other projects to reduce them to what they consider to be a more realistic reflection of the "As built scenario". Natural England has provided more detailed comment on the Applicants approach at deadline 6 [REP6-053]. However in the context of the HRA, Natural England would make the following overarching points: - The principle of revising the figures from other projects: Within this assessment represents a set of assumptions from the applicant in relation what they consider to be a most likely scenario within the Maximum Design Parameters. Whilst we acknowledge that these assumptions are informed by their expertise of the industry, Natural England's view is that unless these parameters are legally secure (i.e. the MMO/Marine Scotland Licensing) can confirm/give certainty the project would not be able to build out to their Maximum), then the figures from their original assessment should be used.</p> <p>- The Applicant's approach to revising the figures of other projects: Natural England made detailed comments on the applicant's approach to revising the collision and displacement figures of consented plans and projects in our deadline 6 response [REP6-053].</p> <p>Consequently Natural England does not consider that the Applicant's in-combination assessment is valid, and consider that it has the potential to significantly underestimate the in-combination impact.</p> <p>...."and also applies a NAF (Table 7.35, [APP-051]" It's unclear what this relates to as CRM always apply a NAF. Natural England did not agree with the NAF presented in the ES. The applicant has since presented figures using alternative NAF, but these do not accord with Natural England's advice.</p>	

Natural England's Annex A Further Advice on REP5-010 Preliminary Trenching Assessment (REP7-074)

Response

Natural England's Comments	Applicant's Response
<p>1.1 Further to the interim advice provided by Natural England for Deadline 6 [REP – 048] England's Stratigrapher has subsequently considered the evidence presented by the Applicant.</p>	
<p>2.1 Having reviewed the report the stratigrapher has confirmed our initial comments that there is a clear issue regarding the current extent of the geophysical and geotechnical data available to inform the design and execution of the cable burial along parts of the cable route within the protected areas. This might be critical if (for example) the Egmond Ground Formation is present within the range of the trench depth.</p>	<p>The Applicant acknowledges that there are sections of the cable route that currently have no seismic data coverage; however, in these areas there is sufficient geotechnical survey coverage, complimented with testing the same units from other areas along the cable route, to give high confidence in the likely range of soil properties along the entire offshore cable corridor. Following this, the Applicant has high confidence in the ability to install cables within the project design envelope.</p> <p>With reference to the Egmond Ground Formation, as summarised within Table 4.3 of the Preliminary Trenching Assessment we expect this unit to comprise 'Dense to very Dense silty muddy sand'. In terms of assessing the suitability of trenching in this type of soil we consider the gravel content to be a key parameter and we predict this to be very low (less than 5%) and therefore remain confident. We would appreciate any experience Natural England have of installing cable into this formation and any lessons learnt they can share.</p>
<p>2.2 Whilst we agree that there is inevitably an iterative process in the acquisition of this data; the comments set out at point 3 (below) indicates that an improvement in understanding of these particular sectors is a priority in relation in relation to achieving confidence in the trenching methodology.</p>	<p>The comment is noted.</p>
<p>2.3 NB: The advice provided below should be considered alongside our previous</p>	<p>The comment is noted.</p>

Natural England's Comments	Applicant's Response
advice provided at Deadline 6 [REP – 048].	
3.1 Currently there are some substantial sections along the cable route that are within marine SACs or MCZs that have not been intrusively sampled and/or lack shallow seismic data because of the presence of strong surface or near-surface reflectors.	See response to 2.1 above.
3.2 Given that some of these gaps could be interpreted as being underlain by the Egmond Ground Formation, and given that this may be cogent to the tooling assessment, a greater degree of certainty is needed in order to be confident of successful cable burial in these zones.	See response to 2.1 above.
4.1 Chalk: In terms of a geotechnical material, the Chalk has been treated as weathered and structureless, as is also suggested by the cone penetration tests. Nevertheless, where exposed on the foreshore between Weybourne and West Runton there is evidence of hard grounds, as well as horizons containing frequent large flints. These suggest that conditions could be quite variable and are hardly structureless. It may be that the foreshore exposures were originally overlain by glacially tectonised and weathered chalk that has been removed by wave action. But remain uncertain that the Chalk will be in a weathered condition wherever it is encountered on the cable route. The lessons gained from the Rampion Project indicate that cabling could be installed successfully in trenches cut in unweathered chalk which (given the location and route) would have encountered hardgrounds and nodular chinks where the unconfined shear strengths of the rock are in the range of 10s of MPa as opposed to the maximum 500kPa indicated for the Hornsea route.	Based on the information collected by the Applicant from the offshore cable corridor, which has included intrusive sampling of the chalk using a combination of boreholes, vibrocores and CPT's, there is no evidence that hard grounds exist along the Hornsea Three offshore cable corridor. However, the Applicant is pleased to note that NE conclude based on the lessons learnt from Rampion Offshore Wind Farm that trenching in unweathered chalk (which NE indicate would have encountered hard grounds and nodular chinks) was successful.
4.2 No comments on other lithologies.	
5.1i The limitations in the ground models have been noted. While it is clear that further investigations will improve the ground models, some comment should be	The comment is noted.

Natural England's Comments	Applicant's Response
<p>made about the assumptions made along parts of these transects where the data remains limited.</p> <p>i) Figure 4.3. Shows the Bolders Bank Formation abutting the coast. One would therefore expect there to be an onshore correlate (Holkham Till Formation?) which might help to characterise this unit given its extensive distribution along the cable route.</p>	
<p>5.1 ii. Figure 4.6. Seems reasonable to infer the presence of the Bolders Bank Formation at the northern end of the section.</p>	<p>The comment is noted.</p>
<p>5.1 iii. Figure 4.8. If it is the Egmond Ground Formation underlying the Bolders Bank Formation, then it appears that it would intersected by the trench and needs to be considered in the trenching feasibility assessments (tables 5.2 - 5.4). At present this unit does not appear to have been considered and since it is reported to have different properties to the Botney Cut and Bolders Bank formations (table 4.3), this may be cogent when considering the appropriate tooling for the work.</p>	<p>Please see response to 2.1. To be clear, the Applicant does not anticipate any issues with trenching within the Egmond Ground Formation.</p>
<p>5.1 iv. Figure 4.9. We don't believe that the interpretation makes sense. If the missing layer is the lower part of the Botney Cut Formation and it extends the full length of this sector, then it is underlying the Bolders Bank Formation – which would be a paradox – as everywhere else the Botney Cut Formation rests unconformably on the Bolders Bank and older formations. One possibility is that the missing layer is represented by the Egmond Ground Formation. If this were to be the case, then this would need to be addressed in table 4.3).</p>	<p>As stated in Section 4.16 of the Preliminary Trenching Assessment, it was assumed that the missing layer is the Egmond Ground Formation so the Applicant agrees with Natural England's interpretation of the missing underlying layer. This formation is considered within Table 4.3 of the Preliminary Trenching Assessment.</p>
<p>5.1 v. Figure 4.11. Agreed – likely to be Egmond Ground Formation. Given that it is very shallow in places it again needs to be addressed in table 4.3.</p>	<p>The Edmond Ground is considered within Table 4.3 of the Preliminary Trenching Assessment</p>
<p>5.1 vi. Figure 4.18. On the basis of figure 4.20 could be Botney Cut or Bolders Bank formations, while the presence of the Egmond Ground Formation cannot be</p>	<p>Whilst not in this specific location, physical samples have been collected from these formations along the offshore cable corridor to characterise them and</p>

Natural England's Comments	Applicant's Response
ruled out on the available evidence. Clearly needs physical sampling.	the material properties are summarised in Table 4.3 of the Preliminary Trenching Assessment.
5.1 vii. Figure 4.19. Comments as for figure 4.18 (above).	Please see response to 5.1(vi) above.
6.1 We would recommend that geotechnical, geophysical and geological data acquired through these surveys is deposited with the British Geological Survey where it would supplement other North Sea data and contribute to a much improved knowledge of the geology of the Quaternary and Holocene sediment of the North Sea. As this data accumulates, it will provide a much more reliable evidence base on which to judge risk and inform management of development and infrastructure in the North Sea.	The Applicant notes the comments from Natural England. As part of the Hornsea Three agreement for lease with the Crown Estate, there is a requirement to provide project information to the Crown Estate's Marine Data Exchange and therefore it is publicly available to Natural England and the British Geological Survey to access.

Natural England's Annex B - Sabellaria spinulosa Advice Note (REP7-075), Annex C - Cable Protection Advice Note (REP7-076) and Annex D - Note on Small Scale Impact (REP7-077)

Response

With respect to these Annexes of Natural England's Deadline 7 response, the Applicant has noted consistency between statements made by Natural England and those made in REP7-067 and REP7-066. A Position Statement on Benthic Ecology matters, including the NNSSR SAC, WNNC SAC, the Cromer Shoal Chalk Beds MCZ and Markham's Triangle pMCZ will be submitted at Deadline 9 which will be based on those Natural England's Deadline 7 responses (i.e. REP7-067 and REP7-066) and therefore the Applicant would direct the ExA to this document.

Natural England's Annex E Ornithology Response (REP7-078)

Response

The Applicant has fundamental concerns with the way in which Natural England have quantified their position. No issue is taken with Natural England highlighting the importance of the precautionary principle in the context of HRA in general terms, only their extreme application of it in this case. A degree of uncertainty is inherent to any

assessment process as it necessarily involves prediction and modelling. That has applied to every offshore wind farm consented to date. Hornsea Three is no different, even allowing for Natural England's concerns over the baseline data (which is also not unique to Hornsea Three). Natural England's general approach appears to be say, not all doubt has been positively disproved, and fasten upon that as 'uncertainty'. In many cases, in doing so, Natural England ignores new evidence. Examples include:

- Confounding sources of variability leading to considerable over-estimation of predicted impacts
- The use of the worst case scenario for all parameters, without acknowledgement that this is the case, when Natural England have advocated consideration of a range
- No consideration of evidence when providing figures with this relevant to:
 - Nocturnal activity factors
 - Apportioning rates
 - Flight speeds
 - Avoidance rates

Confounding sources of variability

As stated by Natural England in paragraph 3.20 of REP1-211, it is not possible to combine uncertainty across different parameters in Band (2012). To do this would compound uncertainty and would not be statistically robust. However, Natural England have, in their assessments presented in REP7-078, combined two areas of uncertainty/variability, namely the variability associated with density data and avoidance rate and the variability associated with flight height distribution and avoidance rate. In Natural England's assessment, variability between the two parameters identified above are combined one on top of the other. This leads to an inaccurate understanding of uncertainty and meaningless upper and lower confidence intervals.

Evidence-based approach

Natural England, throughout their submissions have stated that variability and uncertainty should be considered throughout the assessments conducted. One way in which to do this is through the use of available scientific evidence. This is accepted by Natural England when discussing various parameters including flight speed, apportioning rates, nocturnal activity factors and avoidance rates. For example, in REP1-211 Natural England state:

“Natural England's preference is to use the age class data from the offshore surveys to estimate the proportions of 'adult type' birds that are present at the project site and to use this to inform a range of adult apportioning values.”

However, in REP7-078 Natural England have used only one apportioning value representing the highest apportioning rate calculable from age class data. This is not consistent with Natural England's previous advice on this project or advice provided to other projects and has been applied despite the redundancies of these data identified by the Applicant and the abundant evidence presented throughout the Applicant's submissions in relation to the likely proportion of breeding birds from FFC SPA at Hornsea Three.

The Applicant submits that it is incumbent on the competent authority to ensure, insofar as Natural England disagree with the findings of a comprehensive scientific assessment and now wish to present their own alternative analysis, that Natural England is held to a similar standard as the Applicant, whereby Natural England is required to justify its assumptions and substantiate its position through cogent factual submissions based upon sound scientific evidence.

Mulbarton Parish Council Written Representation REP7-079

Response

Interested Party Written Representation	Applicant's Response
<p>Introduction</p> <p>This submission describes an alternative site for the onshore substation, centred around Mangreen quarry. For convenience, this is described as Option E. The general location of this option is shown overleaf, and some of its potential features are discussed below.</p>	<p>The Applicant has carried out a robust site search and selection process for the HVDC converter/HVAC substation, as detailed in Section 4.11.5 of Volume 1, Chapter 4: Site Selection [APP-059] of the Environmental Statement and Section 3.2 of Volume 6, Annex 4.3: Refinement of the Onshore Cable Corridor and Associated Infrastructure [APP-094]. The reasons for Option B being chosen and included in the Application documentation are described in detail in the documents referenced above.</p>
<p>Main features</p> <p>The northern part of the site, which lies to the north of Mangreen Lane, would be used as a temporary working area, and for all vehicle access during construction. It would use the existing access to and from the A140, which has already been widened at this point to include a right turn lane for southbound HGV traffic. The existing 70m visibility splays may be adequate, except for the delivery of abnormal loads, which may require 'over-running'.</p> <p>After construction, this area would be restored to agriculture and nature conservation, in keeping with the restoration plan already agreed for its previous use for gravel extraction. The existing access to the A140 would then be removed, and the visibility splays replaced by roadside landscaping and planting. These arrangements would be fully consistent with the location of this area within the Norwich Southern Bypass Landscape Protection Zone.</p> <p>The onshore substation would be built alongside the existing Norwich Main site, to the south of Mangreen Lane. During construction, access from the northern part of the site to the southern part would use the existing road crossing over Mangreen</p>	<p>The land referred to as Option E within Mulbarton Parish Council's submission was considered at an early stage, however following a careful assessment by the Applicant it was considered that there is not enough space on that site for the onshore substation without building on land reserved for quarrying (the space required for the permanent and temporary HVDC converter/HVAC substation site is specified in paragraph 4.10.7.11 of APP-059). In addition, this site is crossed diagonally by a gas pipeline and to the south by a 132kv UKPN overhead line which further restricts any developable area.</p> <p>This location was therefore not considered further when other, more suitable sites were identified.</p>

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<p>Lane, which would then be removed when construction is complete. This would ensure that HGV construction traffic keeps to the primary road network and does not use minor roads or country lanes.</p> <p>In the longer term, routine maintenance access to the onshore substation would be from Mangreen Lane itself, following the example currently in use for Norwich Main.</p> <p>The original site of Norwich Main was carefully chosen, and the installation of additional equipment has been generally accepted over many years. The onshore substation would be larger than the existing installation, but its close proximity to the original site could lead to the least overall degree of negative impact.</p> <p>There would be a good chance of effective mitigation by landscaping and planting, and the opportunity could also be taken to improve the visual screening of the combined area from sensitive sites to the north, west and south.</p>	
<p>Conclusion</p> <p>In our view, Option E may be in the best interests of all parties. It could offer the least degree of public harm, and there could be a cost benefit advantage arising from the use of infrastructure already in place. It should therefore be given serious consideration.</p> <p><i>Figure showing proposed Option E was included.</i></p>	

Oulton Parish Council Written Representation (REP7-080)

Response

Interested Party Written Representation	Applicant's Response
<p>Oulton Parish Council (OPC) welcomes this opportunity to comment on the current status of traffic and environmental issues since Deadline 6, the ASI on March 5th and the Issue Specific Hearing on March 8th.</p>	<p>The Applicant has responded to each point raised by OPC below.</p>
<p>1. VISSIM</p> <p>Since Deadline 6, the Parish Council has had sight of the VISSIM traffic modelling scenarios in video format and the council would like to thank the Applicant for making this possible. These are the “large video files” referred to by the Applicant at 3.21 in Appendix 8 (Main Construction Compound Access Strategy VISSIM Modelling Update) containing the models that sit behind the data that have been received by the ExA and by NCC Highways.</p> <p>At 4.6 in Appendix 8, the conclusion is reached that:</p> <p>“VISSIM model for future scenario shows that the entire study network including The Street/B1149 junction would operate satisfactorily with delays of only 38 seconds to the journey from The Street to the B1149.”</p> <p>Please note: a range of screenshots from the VISSIM, with explanatory captions, has been attached in Appendix 1, at the end of this submission.</p> <p>OPC would like to make the following observations on the scenarios we have studied:</p> <p>1.1 We are obliged to observe that there are significant inaccuracies in the baseline data used to construct the model of the southern section of The Street, Oulton, such that it renders almost all the data produced as a result of the</p>	<p>The Applicant thanks Oulton Parish Council (OPC) for its comments on the VISSIM modelling. However, it would reiterate that the VISSIM modelling was provided to assist in the engagement process with OPC and has not been requested by any statutory consultees, including Norfolk County Council (relevant highway authority). The findings of the VISSIM have not directly informed the assessment of effects on The Street, nor the design of the proposed intervention scheme which has been agreed in principle with NCC (and is included in the Outline CTMP). Therefore, any perceived errors in the VISSIM modelling do not affect the accuracy or appropriateness of the assessment and proposed intervention scheme as proposed within the Outline CTMP.</p> <p>Notwithstanding the above, the Applicant has sought to provide some clarifications on the points raised by OPC below.</p> <ul style="list-style-type: none"> The Applicant highlights that the comments from 1.1 – 1.3.2 are isolated, very minor VISSIM model refinement issues from different models videos (for single VISSIM random seed 42). Journey time results are averaged from different model runs for each scenario am/pm peak with 5 different random seed numbers. As a result this means the vehicles are loaded on to the model completely differently every time so traffic conditions change for each model run to reflect a

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<p>simulation unreliable at best, and invalid at worst.</p> <p>1.1.1 The width of the roadway all along its length, from the junction with the B1149 to the site entrance at Saltcarr Farms, appears to have been modelled as if 2 cars, and even a car and an HGV, can pass each other without slowing down. This is quite simply not the case. If it were the case, then there would be very little need for passing bays at all.</p> <p>Although the width of The Street does vary a little here and there, there is no point along its entire length where a white line has been placed down the middle of the carriageway. This indicates in itself that NCC Highways is of the opinion that the roadway is not wide enough for 2 cars to pass safely without slowing down. This is especially true of the very narrow section immediately to the north of the Old Railway Gatehouse.</p> <p>1.1.2 Many inaccuracies flow from this baseline modelling error:</p> <ul style="list-style-type: none"> • Many of the cars are shown passing each other at speed, thus invalidating the “average delay” data generated by the model; • Scenarios frequently occur where a car and an HGV pass each other with ease, away from a passing bay. Since this is impossible, “average delay” data is further invalidated; • Further scenarios occur where 2 HGVs pass each other away from passing bays. Since this is impossible, this also and very significantly – would impact on the “average delay” data generated. <p>1.1.2 Vehicle response to the priority signage at the “hump” beside the Railway Gatehouse appears very frequently to malfunction in the VISSIM, such that cars are shown passing each other on the hump, a car and an HGV are shown passing each other on the hump, and even sometimes 2 HGVs are shown passing each</p>	<p>more realistic scenario. Averaging the journey times over 5 different runs eliminates any error due such minor refinement issues that might be overlooked.</p> <ul style="list-style-type: none"> • Modelling separate lanes for vehicle traveling in opposite directions is the only way possible and a standard practice in VISSIM. The width of lanes are insignificant in VISSIM. The use of give-way markers have been effectively used to accurately replicate the real driver behaviour in both directions along The Street in all scenarios. <p>On the basis of the above, the Applicant would conclude that the journey time results as previously presented remain valid and correct.</p> <p>Furthermore, the Applicant would note that the average delay caused to traffic on B1149 due to abnormal loads will be insignificant. The delay is measured as average delay to per vehicle over the hour which is standard practice.</p> <p>Based on these conclusions, no further work on this modelling is proposed as part of the Examination.</p> <p>In respect to AIL movements along The Street (between the B1149 and the entrance point to the airfield), and the potential for noise and vibration impacts on the Old Railway Gatehouse, the Applicant would refer to Appendix 24 submitted at Deadline 7 (REP7-044) which addresses this matter in detail. It concludes that with the mitigation proposed, no significant noise and vibration effects would occur at the Old Railway Gatehouse as a result of HGV or abnormal load movements along The Street, even if all AIL movements were to occur at night (which is not an anticipated scenario but has been assessed to represent a maximum design scenario/worst case).</p>

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<p>other on the hump. These scenarios are neither possible in real life (given the width of the road) nor are they considered to be desirable by the applicant.</p> <p>1.1.3 The Parish Council is mystified as to how these major inaccuracies can have been allowed to persist within the modelling, but we must stress that the “average delay” data will be significantly distorted because of them. We are obliged therefore to challenge the validity of the Applicant’s statement, quoted above, that: “VISSIM model for future scenario shows that the entire study network including The Street/B1149 junction would operate satisfactorily with delays of only 38 seconds...”</p> <p>This has not been proven.</p> <p>1.2 Even with these baseline inaccuracies, which obviously help to ‘improve’ vastly the apparent flow of all types of traffic along The Street, the VISSIM still generates some pinch points and dysfunction e.g. where too many vehicles are shown following behind each other to be adequately contained in a passing bay when meeting oncoming traffic. Please see Appendix 1 below for a sample screenshot.</p> <p>1.3 Notwithstanding the above, there is one scenario demonstrated by the VISSIM that does yield some useful information, as it does not involve 2-way competing traffic. A screenshot of this scenario is in Appendix 1 attached below.</p> <p>1.3.1 The scenario in question is of an Abnormal Indivisible Load (AIL) – in this case a cable drum – leaving the compound, travelling south down The Street and entering the B1149. In this scenario all traffic was stopped from travelling north along The Street whilst the abnormal load travelled south. Meanwhile, all traffic on the B1149 was stopped in both directions. The abnormal load exited onto the B1149 with the queue of traffic that had built up behind it. When all traffic from The Street had exited, the held traffic on B1149 was released. The observed delay for</p>	

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<p>traffic on B1149 was 5 mins 42 seconds. More alarming even than this, however, is that during that time, depending on the time of day, the tailback of traffic on the B1149 was between 37 and 67 vehicles, in each direction, always including several HGVs.</p> <p>Clearly, it could never be safe to allow that sort of tailback to build up, so close to the unsighted humpback bridge on the B1149.</p> <p>[OPC recommend that NCC Highways view the video format of this AIL scenario in the VISSIM at their earliest opportunity.]</p> <p>1.3.2 Please note: this southbound AIL scenario is not, to our knowledge, referred to at all in the Appendix 8 document. At 4.7 in App. 8, reference is made only to an AIL travelling "in a northbound direction" - when of course the traffic is only held back further up The Street, but is NOT held back on the B1149, thus producing a much less dangerous scenario. We should hardly need to point out, however, that what goes into the compound must also come out.</p> <p>It would seem that, in Appendix 8, the southbound AIL scenario has been "scoped out" – much as the noise of the AILs has been "scoped out" of the Noise and Vibration Assessment that will be discussed later.</p> <p>1.3.3 OPC has to assume that the Applicant is aware that the southbound peak time AIL scenario presents so many dangers to other road users that it would never be permitted, but the council would have appreciated that fact being drawn to our attention, so that we could have had a frank discussion, while NCC were also present, about the likelihood of Abnormal Loads being regularly delivered during the evening and at night. Given the sheer numbers of loads involved, it would probably not be possible to fit them all in to 'quieter' periods of the day.</p> <p>1.4 OPC seeks, at this late stage, absolute clarification on the exact time-periods being referred to in the various scenarios of "off-peak", "outside normal working</p>	

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<p>hours”, “evening” and “night-time” in relation to the movement of Abnormal Indivisible Loads.</p> <p>1.4.1 We should also not be confused by the word “abnormal” into thinking that these AIL movements will be exceptional or occasional. On the contrary, given the scale of the project (1,121 cable drums = 1,121 AILs) it will be the norm that several of them will have to be moved, either separately or in convoys, most weeks, day and/or night, throughout the whole two and a half years.</p> <p>1.5 The Parish Council would like to draw the ExA’s attention at this point to the Table in Appendix 2, attached to this submission. This table has been created by OPC in an attempt to represent, as an indicative illustration, the real density and regularity of these Abnormal Load movements, constrained as they will have to be into the 30-month “active construction period”.</p> <p>The pattern of AIL movements portrayed is based on information provided by the Applicant. 36 cable drums will be delivered to the port every 3 – 5 weeks; the Table illustrates the median scenario of a delivery every 4 weeks. [See Appendix 2]</p> <p>1.6 In view of all of the above, the Parish Council is now significantly concerned that NCC Highways will be forced, because of the traffic dysfunction that would otherwise be created, to conclude that this density of AIL movements over such a long period, will have to be permitted only in the evenings and at night. Such a conclusion would have disastrous consequences for the restful sleep of the residents of the Railway Gatehouse, and of hamlets and villages all over North Norfolk as these Abnormal Loads criss-cross the county from port to compound to cable corridor work front.</p> <p>If the Applicant responds with: “but not all cable drums will go to the Main Construction Compound...”, then this will still afford little comfort to the residents</p>	

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<p>disturbed all along the direct route from the port to a particular section of cable corridor. In any case, the Applicant has offered, and we have to consider here, in common with all planning processes, the worst-case scenario.</p> <p>1.7 Conclusion of this section:</p> <p>To our great consternation, the Parish Council is finding that the more we learn about the real nature of the types, volumes and movement patterns of the construction traffic for Hornsea Project Three, the more alarmed we are becoming.</p> <p>How these narrow lanes and small communities can be expected to absorb the sustained impact of the intensity of it – spread throughout a long working day, and probably several nights, for 6 days of every week, and for two and a half years - is barely comprehensible.</p>	
<p>2. Noise and Vibration Assessment at The Old Railway Gatehouse</p> <p>2.1 At the ISH on 8th March, OPC sought clarification on the issue of the rationale behind the averaging of daily construction traffic noise over an 18-hour period, even though the additional traffic created by Hornsea Three is proposed to be confined to a shorter working day of 11 hours (excluding mobilisation). The council may have to accept that this is some sort of “standard measure” but is keenly aware that averaging anything over a longer period always conveniently brings the average down.</p> <p>2.2 The further point made by OPC at the Hearing was that human receptors never actually experience “average” noise but only individual or grouped noise “events”, interspersed with silence or lower background noise.</p> <p>2.3 Both these points were addressed by the Planning Inspector in 2014, when dismissing the Appeal for an AD that proposed to use this same stretch of road as its access route, and to the same site as the compound. [Ref:</p>	<p>The Applicant would refer to Appendix 24 submitted at Deadline 7 (REP7-044) which provides an update on the construction traffic noise and vibration assessment undertaken for the Old Railway Gatehouse. This report identifies the mitigation proposed by the Applicant, including new commitments to offer the resident acoustic fencing and glazing improvements. Following discussion with BDC EHO, the Applicant has extended this offer further, such that the measures offered to the resident of the Old Railway Gatehouse (by email and letter) comprise the following:</p> <ul style="list-style-type: none"> • Enhanced acoustic glazing on the eastern façade of the property closest to The Street, as well as to the skylight (closest to The Street) and the bedroom on the south-eastern façade (adjacent to The Street); and • An acoustic barrier (i.e. a wall or fence) along the boundary of the garden adjacent to The Street, as well as a short section (up to approximately 10 m in length) along the southern boundary.

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<p>APP/K2610/A/14/2212257]</p> <p>At point 18 in the Appeal Decision, the Inspector challenges the relevance of using “statistical smoothing” in situations such as this, stating that this approach “understates the effects upon the human receptor of separate, sudden bursts of sound which conventional practice recognises to be potentially disturbing.” She goes on to refer to the recently-issued national Planning Practice Guidance on noise, stating that “it does not rely upon numerical measures but on qualitative descriptors”. She continues (point 20) that at harvest time “the traffic noise generated by the appeal proposal would be at the very least noticeable and intrusive and...at times noticeable and disruptive as perceived by any residential occupiers of the dwelling.”</p> <p>The Inspector concludes (point 21) that the passing of the HGV tractor/trailer combinations would “be likely to result in material harm to the living conditions of residential occupiers of the Old Railway Gatehouse, with reference to noise and disturbance.”</p> <p>2.4 The response of this Applicant appears to be that because each passing HGV generated by the Hornsea Three proposal will not (on average) be individually more noisy than existing individual HGVs, the project therefore introduces no (or a very low) increase in traffic noise. This approach completely ignores the fact that the increase in total daily numbers of HGV traffic movements will be substantial (+118), as will the increase in car movements (+130). Each of these additional daily movements will be experienced by the residents as a separate and additional daily noise disturbance.</p> <p>2.5 Perhaps of even more concern is the fact that, at point 4.25 of Appendix 23 to Deadline 6, the Applicant has chosen to “scope out of this assessment” entirely the noise generated by Abnormal Indivisible Loads (AIL) at night. The rationale provided for such an omission is given as the fact that, within the OCTMP, the</p>	<p>The Applicant is committed to continued engagement to ensure the resident has the sufficient security that these measures will be implemented, should they accept the Applicant's offer.</p> <p>With the implementation of the proposed mitigation, the Appendix 24 (REP7-044) concludes that there would be no significant effects on the Old Railway Gatehouse as a result of Hornsea Three, or the cumulative scenario (Hornsea Three and Norfolk Vanguard). It is noted that this assessment has been undertaken based on a worst case assessment of peak flows from both projects occurring at the same time, and as such the mitigation has also been designed with the maximum design scenario in mind.</p> <p>As set out in paragraph 8.7 of Appendix 24 (REP7-044), the Applicant has committed to undertake noise monitoring at The Old Railway Gatehouse during the active use of the main construction compound. This would be to verify the effectiveness of the mitigation proposed and to ensure that noise levels do not reach a level which would be considered a significant effect. Should an exceedance be identified through this monitoring, additional traffic management measures would be discussed and agreed with NCC and BDC. This commitment will be clarified in the Outline CTMP to be submitted at Deadline 9.</p>

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<p>Applicant will have to agree such movements in advance with NCC and that they will commit to notifying OPC and the residents of the Old Railway Gatehouse “of any known night-time AIL movements to minimize the disturbance.”</p> <p>Knowing in advance that one is going to be severely disturbed during the night, is not the same as having a restful night’s sleep. OPC is again mystified, and struggles to understand how the applicant can allow itself to conflate these two situations.</p> <p>2.6 In addition - knowing what we now know about AIL movements, as detailed in Section 1 above - it is becoming clear that noticeable and intrusive AIL movements are almost certainly going to be passing right next to the Railway Gatehouse on many nights of every week, of every year, for two and a half years.</p> <p>2.7 Mitigation: the Applicant has proposed as mitigation for the residents of the Gatehouse:</p> <ul style="list-style-type: none"> • that the grading of the “hump” outside their house (which will avoid the grounding of Hornsea Three low-loaders) should be finished with a special surface that reduces both traffic noise and vibration; • and that there will be priority signage on either side of the hump, so that only one vehicle at a time will ever pass right next to their house. <p>At the Hearing on 8th March, we were informed, during the discussion about Cawston, by the EHO from BDC, that the special road surface referred to was only effective in reducing noise and vibration when vehicles were travelling at more than 30 mph. In this case, there will be a speed limit of 30 mph introduced for the duration of the construction period, which will negate the beneficial effect of the road surface.</p> <p>As to the priority signage, this may well create more disturbance for the residents,</p>	

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<p>with the constant braking and transmission noises of HGVs stopping and starting.</p> <p>2.8 At the Hearing on 8th March, reference was made by the Applicant to an "offer" of further mitigation measures for the residents. The residents pointed out that such an offer had not yet been made.</p> <p>2.9 OPC also believes that it would be wise for a structural survey to be carried out on the current condition of the Railway Gatehouse, so that the baseline situation in terms of potential vibration effects can be established.</p>	
<p>3. Traffic numbers by type and function</p> <p>At the Hearing on 8th March, the Applicant was asked by the ExA to provide at Deadline 7 a detailed breakdown of the vehicle numbers so far provided for the daily movements generated by the compound.</p> <p>The suggestion of the ExA was that such a breakdown might include the numbers of vehicles carrying, for example:</p> <ul style="list-style-type: none"> • aggregate • sand • ducting • cable (AILs) • other HGVs • all other vehicles e.g. cars and vans • and that separate numbers should be clearly provided for IN and OUT movements. <p>At the end of the Hearing, the Applicant demurred and indicated that it would be</p>	<p>As indicated by the Applicant at the Hearing on 8 March 2019, the provision of a detailed breakdown of traffic flows requested by the ExA, and by OPC, is not possible at this stage in the design process for the reasons set out below.</p> <p>The Applicant has identified, within Appendix 1 of Deadline 3 (REP3-010), the likely uses of the main construction compound. However, the precise details of construction and construction programme will be determined by the principle construction contractor, based on the contractor's logistics plan. Contractors may utilise the main construction compound to a greater or lesser extent for particular activities (although the maximum use will not exceed the parameters assessed within the EIA) across the construction period. As such, it is imperative the Applicant has the flexibility to utilise the total vehicle movements on a daily basis for a particular activity/type of movement at any given time during the construction programme. Various design parameters will influence what, how much and when materials are transported to and from the main construction compound. Such parameters include transmission technology, phasing and final locations of link boxes/joint bays which will in turn influence the length of the cables and by proxy, the number of cable drum vehicles.</p> <p>On this basis it is not possible to provide a definitive breakdown of movements to and from the main construction compound by purpose (i.e. movement of</p>

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<p>unable to provide such figures.</p> <p>OPC is obliged to comment that it can in no way understand why such a breakdown of figures should be so difficult for the Applicant, for two reasons:</p> <ul style="list-style-type: none"> • this developer is not a novice in the field and has constructed cable corridors before; • the Applicant has consistently provided to OPC over many months now the daily vehicle movement figures for the compound as 118 HGVs and 130 staff vehicles. <p>If the Applicant is unable to break these numbers down into different vehicles by</p> <ul style="list-style-type: none"> • type and function then what are we to understand by this? • Have these numbers not been derived from detailed planning by their construction engineers - and, if not, are they therefore meaningless? <p>Oulton Parish Council would hope that the ExA will persist in encouraging the Applicant to make sense of its own figures, and to share this understanding with stakeholders.</p>	<p>ducting, sand, aggregate etc.). Instead, the Applicant has calculated and assessed the total movements on a daily basis that are required to enable the Applicant to deliver the construction of the onshore cable corridor within the 30 month period identified.</p> <p>Notwithstanding the above, the maximum traffic flows along The Street, identified as 118 HGVs and 130 staff two way movements on a daily basis (see below), have been developed based on professional judgement and application of knowledge from previous projects. The Applicant has used an indicative breakdown of activities to generate traffic flows for each cable section, which has then informed the maximum traffic flows which would occur to and from the main construction compound on a daily basis. This is provided in Appendix 7 of Deadline 4 (REP4-028). Abnormal load movements are included in the daily maximum figure for HGVs.</p> <p>Following a request from the ExA and OPC, the Applicant can confirm that the 118 HGV and 130 staff two-way movements on a daily basis could also be presented in the following way (on a daily basis):</p> <ul style="list-style-type: none"> • 59 HGV movements into the main construction compound (along The Street from the B1145); • 59 movements from the main construction compound (along The Street to the B1145); • 65 staff (non-HGV) movements into the main construction compound (along The Street from the B1145); • 65 staff (non-HGV) movements from the main from the main construction compound (along The Street to the B1145). <p>The Applicant confirms that it has designed the traffic intervention scheme</p>

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	<p>along The Street, and associated management measures to enable and mitigate the movements generated by Hornsea Three, as well as those which may be generated by Norfolk Vanguard (should the use of The Street by both projects overlap). This is to ensure that a maximum design scenario has been assessed and mitigated for. The scheme and associated management measures, which have been agreed with NCC as the local highway authority, have been included within the Outline CTMP (REP7-045).</p>
<p>4. Appendices. Appendix 1. VISSIM Screenshots/notes. Appendix 2. Abnormal Indivisible Load (AIL) Data.</p>	<p>These appendices relate to points made by OPC which the Applicant has responded to above.</p>

CPRE Written Representation (REP7-081)

Response

Interested Party Written Representation	Applicant's Response
<p>CPRE Norfolk have had an active interest in the above application through all stages of the consultation process including from the start the public roadshow events – likewise Vattenfall Vanguard. More recently we have read the Statement of Common Ground between North Norfolk District Council (January 2019), the Report on the Implication for European sites (21 February 2019) and the Examining Authority's Schedule of Changes to the Draft Development Consent Order (7th March 2019).</p> <p>As such we now make a Closing Statement which embraces these documents; and we do this in the context of the Examination as a whole on two key and inter-related points which are never addressed anywhere in the documentation, or questioned by PINS. These are the relationship between the National Planning Policy Framework and the Hornsea Three Project; and the interpretation of PINS Advice Note 9 on the Rochdale Envelope, and with it the power transmission onshore and the implication for open-cut cabling of HVAC versus HVDC</p>	<p>The Applicant responded to CPRE comments, which have not evolved significantly during the course of examination, in Annex 2 of REP1-131 Applicant's Response to Relevant Representations. The additional comments below supplement these comments where there has been movement on issues raised by CPRE.</p>
<p>The Ecology and Nature Conservation document at page 5 gives a summary of NPS EN-1 and NPS-5 policy on decision making (and mitigation, which come back to later as regards HVAC versus HVDC). This is followed at 3.4.2 with 'Other relevant policies'. The first of four at 3.4.2.1 is National Planning Policy Framework (NPPF) (DCLG, 2012.) Table 3.3 expands to say "One of the overall aims of the NPPF is that the planning system should aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible. Principal relevant statements are included at paragraph 10 of the NPPF."</p>	<p>With regard to habitat connectivity, the Applicant has now submitted (4th Feb 2019) a ghost great crested newt (GCN) licence to Natural England which promotes an option to create additional habitat for GCN (farmland pond restoration and additional habitat connectivity). The Applicant is currently awaiting feedback from Natural England on this proposal.</p>

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<p>The 2012 NPPF was replaced on 24 July 2018, and while the Introduction at paragraph 5 at 2012 in referring to the NPPF and Nationally Significant Infrastructure Projects is repeated at 2018, there are in 2018 some major additions and emphasis in the relevant topic, Section 15, Conserving and Enhancing the Natural Environment. Note that for the 2012 NPPF the reference quoted above should be Section 11, not paragraph 10. More important is that the applicant's documentation has been written in a mind-set of the 2012 NPPF. The biggest changes registered in the 2018 NPPF turn on the ecological network, in which river systems and their connectivity with each other is of high importance, see paragraphs 170d and 170e; also paragraphs 174a and 174b; and the definition in Annex 2 of the Nature Recovery Plan - all derived from the 25-Year Environment Plan launched on 11 January 2018.</p> <p>The implications of this are that we have to deal, where relevant, with the wider countryside, and not just focus on individual EU designated sites and EU protected species in isolation, which is the approach of the applicant. Even at 2012 there was some reference to the ecological network that justified consideration, and with the 2018 NPPF it should not be ignored again. There have been some major advances since then, and in particular that the restoration of farmland ponds is a very powerful addition to hedgerows and grassland in enhancing connectivity in wildlife networks, within which there may be included EU sites which benefit and make more robust, and also protected species. As regards rivers, the Glaven is the most vulnerable to open cut trenching, as the cabling route runs throughout the corridor rather than crossing as it does for the Bure, Wensum and Tud. The onshore landing is again at Weybourne, Hornsea Three will be the third to do so. The Glaven shares with the Wensum protected species white-clawed crayfish (highest level), brook lamprey and bullhead. The upper half of the Glaven is an Ark site which has healthy populations of the native species, almost alone in the chalk rivers of south east England, including the others</p>	

Interested Party Written Representation	Applicant's Response
<p>affected by the cabling route. One careless incident over the many years of the Project, for example contamination from the plague carried by the spores and not disinfecting clothing and equipment used on another river site, would see that lost. Other protected and more robust protected species are otter and great crested newt.</p>	
<p>In summary, the point we make above is that evaluation of ecology and nature conservation is more complex than considering an EU site in isolation, or by looking at protected species site by site, when most species have a greater or lesser mobility, and that in assessing environmental impact there is a need to take account of the relevant policies in the 2018 NPPF. We add that in the EIA process, it is not in the public interest to do so in terms of worst case scenario or maximum impact when in all cases, except connection to the national grid, this is in effect HVAC. Further that HVAC becomes the baseline scenario all along all the cabling route. Why not make clear it is HVAC versus HVDC with the one exception of the substation at the national grid? This lack of plain speaking is further confused by giving no data for comparing land take in the cabling route for the two options. Why not make clear that HVDC provides much mitigation with less land take and a shorter time scale on the impact on nature conservation (and of course for farmers)</p>	<p>The Applicant has fully set out the need to include both transmission systems within its design envelope in its previous submissions (see in particular REP1-164), and its case on this point was examined in depth at ISH1 (see audio recording at EV-012 and the Applicant's written summary of oral case at REP3-003).</p>
<p>A CPRE member has made contact with BEIS through Norman Lamb MP and presented at point 4 our best estimate on the difference in land take between HVDC and HVAC, and the wider mitigation benefits of HVDC, which we attach as the document of 22nd November 2017. This was followed by another letter on the 17th January 2018, also attached. In this we discuss the interpretation of the PINS Advice Note Nine. To leave HVAC as an option in our view does not accord with the intention and spirit of this, and perhaps the legality if tested.</p>	

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<p>Finally, on the January 2019 statement of common ground between Orsted and North Norfolk District Council we note that the greatest concerns are socio-economic: the impact on the tourism economy in the construction phase, which is under discussion, and NNDC consider has been significantly downplayed, and access to public footpaths. Agreed common ground is that "The use of HVDC transmission for the Hornsea Project would help to reduce the impact of construction on the local tourism and the agricultural economy." We think that farmers will think NNDC seriously underplays their situation. We add that NNDC underplays the ecology and nature conservation interests, but this can be explained by there being no in-house ecologists in Norfolk's local councils other than one at the County Council.</p>	<p>The Applicant has fully engaged with all LPAs, including Norfolk County Council and their Natural Environment Team (agreement on ecology and nature conservation matters noted in the latest SoCG with NCC [REP4-019]), and agricultural landowners individually and through the National Farmers Union/Land Interest Group representatives to address issues of interest to these parties.</p>

Broadland District Council Written Representation (REP7-082 - REP7-084)

Summary

The submissions made by Broadland District Council at Deadline 7 (REP7-082 - REP7-084) directly reflects the issues identified in Annex A of the Statement of Common Ground between Hornsea Three and Broadland District Council. As such, the Applicant would refer to the responses provided in that document (REP7-082 and REP7-017), and notes that engagement is continuing with BDC, in particular the Environmental Health Officer to address the outstanding matters relating to the Old Railway Gatehouse (along The Street) and Cawston.

The Applicant submitted revised versions of the Outline LP and Outline EMP at Deadline 7 (REP7-018 and REP7-019) and continues to engage with the relevant local authorities to address their outstanding comments. Discussions with North Norfolk District Council relating to the Outline LP are set out in the response to REP7-085 below. The Applicant proposes to submit a final version of the Outline LP at Deadline 9, and would note that should any outstanding issues remain at this point in time, there remains an opportunity for local planning authority input into the detailed Landscape Plan which is required to be submitted for their approval prior to commencement of development in accordance with Requirement 8 of the draft DCO [REP7-003].

North Norfolk District Council Written Representation (REP7-085)

Response

Interested Party Written Representation	Applicant's Response
<p>REPRESENTATIONS FOLLOWING ISSUE SPECIFIC HEARING ON 08 MARCH 2019 FOR DEADLINE 7</p> <p>1. Introduction</p> <p>1.1. These are North Norfolk District Council's written submissions following Issue Specific Hearing 9 on the Draft Development Consent Order. They do not cover in writing all the matters on which oral submissions were made, but expand or elucidate where required. Also enclosed are comments requested by the Examining Authority for Deadline 7.</p>	<p>The Applicant has responded to each point below.</p>
<p>2. Landscape Matters including Outline Landscape Plan</p> <p>2.1. NNDC welcomes the indication from the Applicant that it will be accepting and incorporating the wording of Requirement 8 in full as proposed by the LPAs into the DCO.</p> <p>2.2. NNDC are working with the Applicant and South Norfolk and Broadland District Councils to review the applicant's comments on the Outline Landscape Plan (OLP) and Outline Ecological Management Plan (OEMP) in order to agree an acceptable way forward.</p> <p>2.3. Undertaking this review, it has emerged that there is a clear difference of opinion between the Applicant and NNDC on the most appropriate approach to landscape mitigation and periods for maintenance. Furthermore, it is also becoming apparent that there is a difference of understanding between the Applicant and relevant LPAs as to terms used within the DCO submission including those within the OLP and OEMP. This is affecting the ability for parties to</p>	<p>2.1 Noted</p> <p>2.2 The Applicant submitted revised versions of the Outline LP and Outline EMP at Deadline 7 (REP7-018 and REP7-019) and continues to engage with the relevant local planning authorities to address their outstanding comments. The Applicant had a productive meeting with NNDC on 20/03/2019 which and will be submitting a final version of the Outline LP at Deadline 9 which addresses many of the points discussed (see 2.3 – 2.9 below). The Applicant would note that NNDC will be consulted during the development of the detailed Landscape Plan which is required under Requirement 8 of the DCO.</p> <p>2.3 – 2.9 The Applicant notes the comments made by NNDC, and provided clarification on the points in a meeting with NNDC on 20/03/2019. In response to these discussions, the Applicant has reviewed the wording of the Outline LP. A revised version of the Outline LP will be submitted at Deadline 9 to reflect the agreed changes.</p>

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<p>agree an acceptable way forward. Such confusion arises with terms used such as:</p> <ul style="list-style-type: none"> · Onshore Cable Corridor; and · Enhancement Corridor <p>2.4. There is no clear definition of what the above terms mean and, in particular, the term Onshore Cable Corridor appears to have many different meanings across the DCO submissions, which does not help in the production of a Landscape Plan.</p> <p>2.5. In the Environmental Statement (ES) Volume 1 Chapter 3: Project Description (APP-058) paragraph 3.7.3.2 sets out that the Hornsea Three Onshore Cable Corridor 'consists of an 80 m (although a wider corridor is provided for in certain limited locations as shown on the Works Plans – Onshore (document reference number A2.4.2)) temporary easement, within which a 60 m permanent easement post installation is located. An overview of the Hornsea Three onshore cable corridor is presented in Figure 3.29, with more detailed routing shown on the Works Plans – Onshore (document reference number A2.4.2).'</p> <p>2.6. Neither the onshore works plan (A2.4.2) nor the cable corridor presented in Figure 3.29 nor any other documents available to NNDC appear to provide any clarity about whether reference to the onshore cable corridor during construction stage has the same meaning as the onshore cable corridor during the operational stage, i.e. is the cable corridor the permanent easement or both permanent and temporary easement? Such clarity becomes important when reference is made to the onshore cable corridor in the Outline Landscape Plan (Feb 2019) at para 6.1.1.3. Here reference is given to the fact that 'Trees will not be planted above the onshore cable corridor'. This paragraph (and para 1.1.1.4) of the OLP (Feb 2019) introduce the term 'enhancement corridor' with reference to a 100m enhancement corridor intended for 'hedgerow gap filling and hedgerow tree planting...where practicable and as agreed with the landowner.' This raises further</p>	<p>The changes which will be made include:</p> <ul style="list-style-type: none"> • Confirmation that the LP seeks to provide proportionate mitigation in paragraph 1.1.1.3 and 2.1.1.4. • Changing the title of section 3 to 'Pre-Construction Surveys and Design Refinements'; • Addition of 'Details of surveys, assessments and method statements as guided by BS 5837 and the Hedgerows Regulations 1997' to paragraph 1.1.1.4; • Clarification in paragraph 6.1.1.3 that trees will not be planted above land permanently impacted by Hornsea Three along the onshore cable, but replacement trees will be planted in land temporarily impacted by Hornsea Three along the onshore cable corridor; • Clarification in paragraph 6.1.1.3 that the 100 m enhancement corridor could, with the example of a 80 m working corridor, extend 20 m to one side of the working corridor, 10 m to either side of the working corridor, or any combination up to a maximum total width of 100 m; • Clarification of the management period durations in section 7.1; • An addition that the detailed LP(s) will include a set of criteria to be agreed with the relevant LPAs against which woodland establishment will be determined; and • Additional management measures for individual trees in new section 7.6. <p>Based on these amendments, the Applicant understands that NNDC would agree in principle to the outline LP with the exception of the ongoing discussion</p>

Interested Party Written Representation	Applicant's Response
<p>questions as to how the 100m enhancement corridor is defined, particularly in the context of the lack of clear definition for the onshore cable corridor.</p> <p>2.7. NNDC recognise that at this stage it may not be possible for the Applicant to narrow down design options given the wide envelope for different transmission systems. However, it would be possible to clarify how the onshore cable corridor during the operational phase is to be defined in terms of whether this includes both temporary and permanent land take or just the latter for exclusion of mitigation trees. It is preferable in NNDC's view for this clarification to happen during the examination process, to avoid difficulties arising after the DCO is made.</p> <p>2.8. The extent of permanent land take for the cable corridor is likely to be influenced by the final chosen transmission system. Based on the evidence heard in ISH 1 and ISH 3, it is clear that use of HVDC transmission is likely to require a narrower cable corridor on the basis of fewer cables meaning, in theory, a larger area for potential landscape mitigation and enhancement along the cable corridor within the order limits and increased potential for replacement tree planting. These are considerations that again weigh heavily in favour of HVDC transmission for this project.</p> <p>2.9. Until such time as further clarification is provided about the extent of the onshore cable corridor and the scope for mitigation hedge and tree planting, it is not possible for NNDC to conclude discussion on an appropriate solution for the Outline Landscape Plan. NNDC would welcome further discussion with the Applicant and South Norfolk and Broadland District Councils in order to progress these matters and to complete an Outline Landscape Plan with which all parties can agree. A meeting has been requested with Ørsted and other relevant LPAs to take forward this matter urgently.</p>	<p>regarding the duration of the maintenance/management period. This will be confirmed within a Statement of Common Ground to be submitted at Deadline 9.</p>
<p>3. Suggested Further Amendments to the draft DCO</p>	<p>3.1 – 3.4 The Applicant does not accept the revised wording of Requirement 9</p>

Interested Party Written Representation	Applicant's Response
<p>Requirement 9</p> <p>3.1. NNDC welcomes the suggested amendment of Requirement 9(2) in respect of the 10-year replacement planting requirement. In discussion it has become clear that the period running from “planting” creates a practical difficulty around the replacement period, which could cause confusion for relevant local planning authorities and other interested parties in knowing when the ten-year replacement planting period commences for each phase of the project.</p> <p>3.2. In light of this, NNDC recommends that Requirement 9(2) is amended further to read:</p> <p>9(2) - Any tree or shrub planted as part of an approved landscape plan that, within a period of ten years after planting commencing upon the first generation of power from the authorised project (or, in the case of a multi phased project, within a period of ten years commencing upon the first generation of power by each phase of the authorised project) is removed by the undertaker, dies or becomes, in the opinion of the relevant planning authority, seriously damaged or diseased must be replaced in the first available planting season with a specimen of the same species and size as that originally planted unless otherwise approved in writing by the relevant planning authority.</p> <p>3.3. This avoids multiple 10-year periods running at different times, beginning every time a tree is planted. Given the length of the cable route, this could lead to significant practical problems. Unless the Applicant kept records for each planting and provided those to the relevant LPA, it would be difficult to know when the Applicant's obligations in relation to planting begin and end. In order to simplify this, NNDC suggests that a universal date be applied across the whole of the cable route, and given the Applicant is obliged under Requirement 24 to notify when the first generation of power takes place, this appears to be a suitable date.</p>	<p>proposed by NNDC.</p> <p>The Applicant has committed, as set out in paragraph 5.1.2.4, 5.1.3.5 and 6.1.1.3 of the Outline LP to implementing the soft landscape planting in the first available planting season after the completion of construction. As set out in paragraph 7.1.1.2, the Applicant proposes that the maintenance period for the planting along the onshore cable corridor (which is subject to temporary access rights) would commence at the culmination of the planting works within each local authority boundary for each phase and not upon the first generation of power. To specify the commencement of the maintenance period at the first generation of power would not secure management provisions, including establishment measures, (as outline in the Outline LP) for the period between planting and first generation of power (e.g. during commissioning works or completion of offshore construction).</p> <p>As such, the Applicant considers it essential for the maintenance period to commence as soon as planting is complete within a local authority boundary, to ensure necessary establishment provisions are implemented whilst avoiding confusion for the local planning authorities. The Applicant has amended wording at paragraphs 7.1.1.1 and 7.1.1.2 of the Outline LP at Deadline 9 to clarify this.</p> <p>3.5 – 3.6 The Applicant can accept these proposed amendments and they will be incorporated into the next version of the DCO.</p>

Interested Party Written Representation	Applicant's Response
<p>It has the virtue of simplicity.</p> <p>3.4. For a multi-phase project, the 10-year period would run from the first generation of power for each phase.</p> <p>Requirement 24</p> <p>3.5. In light of proposed changes to Requirement 9(2) the following amendments to Requirement 24 are proposed:</p> <p>24 - The undertaker shall notify the relevant planning authority and the MMO upon first generation of power from the authorised project not less than seven days after the occurrence of this event. In the case of a multi-phased project, the undertaker shall notify the relevant planning authority and the MMO upon first generation of power from each phase of the authorised project, not less than seven days after the occurrence of this event.</p> <p>3.6. It is considered that these changes enable relevant planning authorities to plan resource allocation more effectively and provides simplicity and clarity for all parties including other interested parties concerning mitigation planting. In multi-phased schemes, Requirement 6 will provide the necessary clarity on the phases of construction proposed by the Applicant providing the necessary link with Requirement 24.</p>	
<p>4. Tourism/Socio Economic Impacts and the need for a Community Benefit Scheme within the DCO</p> <p>4.1. During the process of updating the Statement of Common Ground, whilst the position of the Applicant is noted, there is concern nonetheless from NNDC that the Applicant does not appear to recognise the potential impact of the project during the construction phase on small tourism businesses, nor has an</p>	<p>The Applicant notes NNDC's concerns; however, it maintains its position as set out in the Statement of Common Ground between Hornsea Three and North Norfolk District Council (REP7-014). This provides a summary of the socio-economic assessment undertaken in Volume 3, Chapter 10: Socio-economics (APP-082) and concludes that there would be no adverse significant effects as a result of Hornsea Three on tourism or local businesses. The Applicant has</p>

Interested Party Written Representation	Applicant's Response
<p>appropriate mitigation strategy been proposed to address those impacts.</p> <p>4.2. During consideration of the Ørsted Hornsea Project Three proposal the Applicant has contended that with appropriate strategies in place to manage the impacts (such as through the submission of an Outline Code of Construction Practice, Outline Construction Traffic Management Plan, Outline Ecological Management Plan and Outline Landscape Plan) this would negate any impacts on tourism related businesses, particularly within the sensitive areas in North Norfolk.</p> <p>4.3. NNDC provided evidence to the Examination at Deadlines 3 and 4 in respect of concerns about potential impacts on the tourism economy, especially during the construction phase. To date the Applicant has not, in the opinion of NNDC, provided a satisfactory response and this has led to the latest statement of common ground recording this matter not in agreement between the parties</p> <p>4.4. Whilst the impact of the project on local tourism may not be considered 'significant' by the Applicant at a regional level, at a local level the impacts have the potential to be lasting and, in some cases could be permanent if businesses are forced to close due to loss of trade attributable to the impact of construction activities affecting tourism draw, no matter how well managed or controlled through a CoCP or CTMP. The Applicant needs to go further to identify mitigation to help tourism (and related) businesses adversely affected by construction activities including how smaller businesses can be compensated so as to avoid their permanent loss/closure.</p> <p>4.5. Impact on the tourism economy is one area where a Community Benefit Fund (CBF) may need to be secured within the DCO and where it may be considered by the ExA and Secretary of State to be both important and relevant to ensure that such impacts, particularly at construction phase, are properly managed and/or mitigated. This is so given that it is NNDC's position that there is still the potential for adverse impacts on the tourism economy despite the controls proposed to be</p>	<p>provided additional evidence to justify this position in its response to ExA written questions Q1.10.7 (REP1-122) and Q2.10.4 (REP4-012).</p> <p>Ørsted has a strong track record for establishing voluntary Community Benefit Funds (CBFs) as part of its community engagement programme for its latest offshore wind farm projects in the UK. These funds can make a valuable contribution to the local area by supporting projects such as community building improvements and recreation facilities, to conservation and wildlife projects. Any such funding scheme would be subject to Ørsted making a positive Financial Investment Decision (FID) and therefore would be put in place post consent. These funds are voluntary and are not therefore intended to be secured through the DCO.</p> <p>The Applicant will continue to develop its local engagement strategy for Hornsea Three and will consider an appropriate way to feed benefits back into the local community. The Applicant recognises the importance of community involvement in shaping any funds to ensure that they are appropriate for the local areas. Prior to allocating funds from Ørsted's existing CBFs, comprehensive local consultation has been undertaken to seek local views from all stakeholders on how the fund should be set up and administered. This ensures that local communities are able to influence the fund; including the funding area, the types of initiatives that would be eligible for support and the size of the grants. The funds are managed by an independent not-for-profit organisation, Grantscape, and are reviewed on an annual basis. The Applicant does not consider a need to secure these community benefits in the DCO as they are voluntary and do not mitigate any impact of the scheme, given that the ES assesses no such impact. As mentioned above, such benefits are typically put in place after receipt of consent and once FID has been made.</p>

Interested Party Written Representation	Applicant's Response
<p>put in place through various DCO requirements.</p> <p>4.6. If the Secretary of State considers it both important and relevant that a CBF is secured as part of the proposal, then he is perfectly entitled to take that into account. This is the flexibility given by section 104(2)(d) of the 2008 Act.</p> <p>4.7. NNDC has assumed, based on other recent DCOs, that discussions regarding any CBF (other than those matters designed to address direct impacts of the proposal) would be undertaken outwith the NSIP process. It is possible that a CBF addressing specific impacts could be secured through the DCO while a more general CBF could be negotiated outside of the DCO process.</p> <p>4.8. NNDC will look to commence a dialogue with Ørsted as soon as reasonably practicable outside of the DCO process on a range of Community Benefits it wishes to secure.</p> <p>4.9. However, NNDC invite the ExA to consider the possibility of securing the necessary mitigation strategy to help tourism and related businesses likely to be affected during the construction phase through a further DCO requirement.</p>	
<p>5. Report on the Implications for European Sites (RIES)</p> <p>5.1. In respect of the RIES published by the ExA on 21 February 2019, NNDC note that, in respect of European sites that are within or have boundaries adjacent to the NNDC area it appears there is some dispute between the Applicant and the statutory consultees/Interested Parties (IPs) regarding:</p> <ul style="list-style-type: none"> • the Wash and North Norfolk Coast SAC - specifically the features of sandbanks which are slightly covered by water all the time and reefs; • the Greater Wash SPA – specifically red-throated diver, common scoter and sandwich tern; 	<p>The Applicant has submitted comments on the RIES at REP7-006.</p> <p>With regards to the Pink-footed Goose Management Plan, the intent (as stated in REP6-057) is for the Applicant to discuss and agree the content of the plan with Natural England prior to including it within the detailed CoCPs, which will be signed off by NNDC. Therefore, NNDC will have assurances that the detailed plan will be fit for purpose. There are no outstanding RSPB concerns with the PFGMP, and the Applicant is awaiting feedback from Natural England to resolve outstanding issues.</p> <p>Natural England have confirmed that they are not the appropriate approval</p>

Interested Party Written Representation	Applicant's Response
<ul style="list-style-type: none"> North Norfolk Coast SPA – specifically pink-footed goose (non-breeding). <p>5.2. At all these sites, a Likely Significant Effect (LSE) cannot be ruled out –all parties are in general agreement on this (apart from a few issues with Natural England (NE) surrounding the adequacy of the baseline data). With respect to the appropriate assessment and adverse effects on integrity, the Applicant concludes that the project would not adversely affect the integrity of the European sites considered within the assessment (including those listed above), however, NE and IPs disagree. NE have advised the ExA that because of its concerns regarding the baseline data and the approach to the assessment of in combination impacts on seabirds, it is unable to agree that all sites likely to experience significant effects have been identified. NE also advises that it is unable to exclude adverse effects on the integrity of any SPA where these are a feature and that the conservation objectives of designated sites would not be hindered as a result of the proposal. Furthermore, NE are unable to agree that the ‘achievement of the conservation objectives’ of the Wash and North Norfolk Coast SAC would not be affected.</p> <p>5.3. Annex 4 of the REIS document identifies the areas of dispute surrounding the various sites and features in some detail. With respect to the North Norfolk Coast SPA/Ramsar, there remains some concern (by the RSPB and NE) about the adequacy of the PFG mitigation plan and the timeframes and surveying required to implement this. There are also some concerns regarding the magnitude of impact on the features of the sandbanks and reefs of the WNNC SAC and the ability successfully to bury the cable and the cable protection requirements, and the impacts these will have on the features.</p> <p>5.4. There are some quite detailed areas of concern (raised by the MMO, NE, TWT and RSPB) regarding some of the designated sites off the North Norfolk coast and within NNDC. NNDC are a Relevant Authority (RA) under the Conservation of Habitats and Species Regulations for the Wash and North Norfolk</p>	<p>body for the PFGMP, but that they wish to be consulted on its content [REP7-065]. This is in line with the Applicant's view stated above.</p>

Interested Party Written Representation	Applicant's Response
<p>Coast European Marine Site (EMS) (which incorporates the NNC SPA/Ramsar and the WNNC SAC) and therefore have specific duties as a RA, which include having a statutory obligation to safeguard the conservation interest features of the EMS. The ability to achieve the conservation objectives (CO) of some of the designated sites are being questioned by NE and IPs.</p> <p>5.5. NNDC request that the ExA (and Secretary of State) as ultimate decision maker fully examine the issues to ensure that the conservation objectives of the designated sites can be achieved. Furthermore, although NNDC have not raised any further issues for the PFG mitigation plan, as a signatory to this document, NNDC would want assurances that it is adequate and fit for purpose.</p>	
<p>6. Statement of Common Ground</p> <p>6.1. NNDC have worked with Ørsted to take forward the Statement of Common Ground (SoCG) with many areas agreed whilst other areas are marked as not agreed and as the final position between both parties. There are some areas where further discussion is required as set out above in relation to Landscape and impacts on Tourism.</p> <p>6.2. Ørsted have indicated that the latest copy of the SoCG will be provided to the ExA at Deadline 7.</p>	<p>The Applicant has submitted the updated Statement of Common Ground between Hornsea Three and NNDC at Deadline 7 (REP7-014). Further updates to the Statement of Common Ground have been made as a result of discussions with NNDC held since Deadline 7. A revised version will therefore be submitted at Deadline 9.</p>

Cawston Parish Council Written Representations (REP7-086 – REP7-92)

Summary

Cawston Parish Council made multiple submissions at Deadline 7; three relating to Issue Specific Hearing 9 (REP7-086, REP7-087 and REP7-089) and four supporting submissions including comments on the outline proposals for the intervention scheme in Cawston, as presented prior to the ISH.

The Applicant has responded to each representation in turn, but notes that some comments have been superseded by the progress made in the development of the outline intervention scheme in Cawston, as set out in Appendix 27 submitted at Deadline 7 (REP7-047).

Since Deadline 7, we have reviewed the feedback received from Cawston residents and further consultation has been undertaken with NCC, resulting in minor refinements being made to the proposed outline traffic management scheme. Annex A to these responses provides the current outline proposals put forward by the Applicant, which have been agreed in principle with NCC and will be included within the Outline CTMP submitted at Deadline 9. This position will also be set out in the Statement of Common Ground between the Applicant and NCC submitted at Deadline 9. The outline schemes would be further developed as part of the detailed CTMP, to be prepared post-consent, and would be subject to further consultation with stakeholders, including Cawston Parish Council and Broadland District Council.

Response to REP7-086

Interested Party Written Representation	Applicant's Response
<p>CONFIRMATION OF ORAL EVIDENCE PRESENTED TO ISSUE SPECIFIC HEARING (ISF9) ON 8TH MARCH 2019</p> <p>This submission is to confirm the oral evidence given by Cawston Parish Council at the hearing on 8th March and provide additional details as discussed. It is one of a number of Deadline 7 documents intended to provide a comprehensive statement of the current views of Cawston Parish Council, including confirmation of the oral evidence, responses to the revised Traffic Management Plan presented by the Applicant at that hearing, discussions of the bridge issue and present traffic problems and comments received from residents.</p> <p>We will also offer a suggestion for a different approach, inviting Hornsea 3 and Norfolk Vanguard to work together, with the Council, for the benefit of both the Applicants and local residents.</p> <p>For continuity purposes, this document is set out in the order of the agenda points at the hearing.</p>	<p>The Applicant has responded to each point below.</p>

Interested Party Written Representation	Applicant's Response									
<p>5. CAWSTON</p> <p>5.A UPDATE AS NECESSARY SUBSEQUENT TO DEADLINE 6 SUBMISSIONS</p> <p>Cawston is a historic village with many 18th century listed buildings in the High Street. The provision for a market dates back to a charter of 1263, issued by Henry III. Figures from the 2011 census;</p> <table border="1" data-bbox="147 603 963 785"> <thead> <tr> <th></th> <th>Cawston Village</th> <th>Cawston Parish</th> </tr> </thead> <tbody> <tr> <td>Population</td> <td>1172</td> <td>1640</td> </tr> <tr> <td>% under 17 or over 65</td> <td>42.2%</td> <td>39.5%</td> </tr> </tbody> </table> <p>5.A.1 Cawston PC strongly supports renewable energy in principle, but these proposals regarding construction of a cable route will cause irreparable and avoidable damage to our village and the lives of residents. We support the recent proposal, led by George Freeman MP, that an Offshore Ring Main would be the most appropriate strategic solution to the issue of connection to wind farms. This would avoid the need for multiple cable routes across Norfolk. We ask the ExA to include this option in your deliberations.</p> <p>5.A.2 We have recently learnt that there is a history of subsidence on the B1145 near Aspen Vale on the east side of Cawston. Norfolk CC is aware of this. The property lies below the road level and there is a steep embankment. The road here is narrow, with trees and exposed roots on the opposite side.</p> <p>5.A.3 On Tuesday 5th March, just before we arrived for the ASI, there was a gridlock in the village when two HGVs tried to pass. This is a perfect illustration of the problems that can be anticipated several times a day if the Hornsea proposal goes ahead. There is a short video of this which is now available online (https://vimeo.com/321543284) and we ask you to view this if at all possible. We</p>		Cawston Village	Cawston Parish	Population	1172	1640	% under 17 or over 65	42.2%	39.5%	<p>5.A.1 The Applicant would refer to the following documents which address matters relating to the grid connection point for Hornsea Project Three and consideration of alternatives:</p> <ul style="list-style-type: none"> • Volume 1, Chapter 4, Site Selection and Alternatives, of the Environmental Statement (APP-059); • Applicants Comments on Relevant Representations submitted at Deadline 1 (REP1-131) – response to RR-019; • National Grid's response to the ExA's written questions submitted at Deadline 1 (REP1-070); and • Applicant's comments on responses to the ExA's written questions submitted by Interested Parties at Deadline 1, submitted at Deadline 2 (REP2-005) – responses to Q1.1.11 and Q1.1.12. <p>5.A.2 - 5.A.5 The Applicant would refer to Appendix 27 submitted at Deadline 7 (REP7-047) as well as the Applicant's response to written representations submitted by Cawston residents submitted at Deadline 8, which provides the Applicant's response to these matters.</p>
	Cawston Village	Cawston Parish								
Population	1172	1640								
% under 17 or over 65	42.2%	39.5%								

Interested Party Written Representation	Applicant's Response
<p>have also prepared a separate document showing this event in still photographs.</p> <p>5.A.4 We would note that the width of the B1145 is only 5.1 metres in several places in the village, insufficient for an HGV and another vehicle to pass safely at any speed. Pedestrian safety is a major concern of the Council.</p> <p>5.A.5 Other concerns include the risk of damage to property, impact on the local businesses and economy, on tourism (there are several holiday cottages and a small caravan site in the village), property values and air quality.</p>	
<p>5B PREDICTED HORNSEA THREE TRAFFIC MOVEMENTS IN CAWSTON, INCLUDING FLUCTUATIONS ACROSS THE CONSTRUCTION PERIOD AND THROUGHOUT EACH DAY</p> <p>5.B.1 At the time of writing (13/3), this level of detail has not been given to us by the Applicant, despite several requests. However, we did note that the Applicant was able to quote an hourly figure at the hearing when discussing rush hour traffic.</p> <p>5.B.2 The only figures given to us directly were in an email dated 1st March, 127 HGV and 244 light vehicle two way movements per day, with a total of 57 two way abnormal load movements during the construction phase.</p>	<p>5.B.1 – 5.B.2 The provision of a breakdown of traffic flows during the construction period and throughout the day is not possible at this stage in the design process as the construction programme has not yet been defined. As such, it is imperative the Applicant has the flexibility to utilise the total vehicle movements on a given day for a particular activity/type of movement during the construction programme. Various design parameters will influence what, how much and when materials are transported through Cawston. Such parameters include transmission technology, phasing and final locations of link boxes/joint bays which will in turn influence the length of the cables and by proxy, the number of cable drum vehicles. On this basis it is not possible to provide a definitive breakdown of movements through Cawston at this stage of the design process as there are too many factors that have not yet been confirmed. Instead, the Applicant has calculated and assessed the total movements on a daily basis that are required to enable the Applicant to deliver the construction of the onshore cable corridor within the 30 month period identified.</p> <p>Notwithstanding the above, the maximum traffic flows through Cawston, identified as 127 HGVs and 244 staff two way movements on a daily basis (see below), have been developed based on professional judgement and</p>

Interested Party Written Representation	Applicant's Response															
	<p>application of knowledge from previous projects. Abnormal load movements are included in the daily maximum figure for HGVs. The Applicant has used an indicative breakdown of activities to generate traffic flows for each cable section, with cable sections 9 and 10 being of relevance to movements through Cawston. This is provided in Appendix 7 of Deadline 4 (REP4-028).</p>															
<p>5.B.3 Appendix 25, which includes Norfolk Vanguard, shows peak daily figures of</p> <table border="1" data-bbox="293 699 1115 970"> <thead> <tr> <th></th> <th>HGV</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Baseline</td> <td>127</td> <td>3477</td> </tr> <tr> <td>Hornsea 3 additional traffic "normal"</td> <td>127</td> <td>370</td> </tr> <tr> <td>Hornsea 3 additional traffic "sensitivity"</td> <td>254</td> <td>497</td> </tr> <tr> <td>Norfolk Vanguard additional traffic</td> <td>240</td> <td>394</td> </tr> </tbody> </table> <p>This represents a rise of 289% in HGV traffic (389% on the sensitivity distribution), by far the highest increases in the tables on Appendix 25 (excluding The Street in Oulton).</p> <p>5.B.4 We have noted the Applicant's assurance when discussing the sensitivity distribution figures at the Hearing that there is "no risk of doubling traffic at Cawston", but we still question how firm is the peak of 127 HGV? What is the risk of any increase, and if so, by how much?</p>		HGV	Total	Baseline	127	3477	Hornsea 3 additional traffic "normal"	127	370	Hornsea 3 additional traffic "sensitivity"	254	497	Norfolk Vanguard additional traffic	240	394	<p>5.B.3 In Appendix 28 to the Deadline 7 submission (REP7-048), the Applicant provided a cumulative assessment (which assumes an overlap of Hornsea Three and Norfolk Vanguard, with no mitigation) for the links through Cawston. This is considered to represent a maximum (worst case) scenario which would result in the maximum number of vehicle movements through Cawston. This assessment concluded that there was potential for minor adverse effects within Cawston without mitigation, although this is not significant in EIA terms.</p> <p>The Applicant is committed to providing an intervention scheme within Cawston to minimise effects further, and the current proposals are provided in Option 1, Revision 4 as shown in Annex B of Appendix 27 of Deadline 7 (REP7-047).</p> <p>5.B.4 The Applicant has committed, as confirmed in paragraph 5.21 of the written summary of the Applicant's oral case at Issue Specific Hearing 9 (REP7-011), that the HGV figure for Hornsea Three of 127 HGV movements along link 88 through Cawston would not be exceeded. The Applicant has agreed with NCC to define the upper limit of HGVs on specific links within the Outline CTMP, with a requirement to seek NCC's consent to exceed this number. These threshold limits will be set out in an updated version of the Outline CTMP, to be submitted at Deadline 9.</p> <p>The Applicant has designed the traffic intervention scheme for Cawston, and</p>
	HGV	Total														
Baseline	127	3477														
Hornsea 3 additional traffic "normal"	127	370														
Hornsea 3 additional traffic "sensitivity"	254	497														
Norfolk Vanguard additional traffic	240	394														

Interested Party Written Representation	Applicant's Response
	<p>associated management measures to enable these movements generated by Hornsea Three, as well as those which may be generated by Norfolk Vanguard (should the use of link 88 through Cawston by both projects overlap). This is to ensure that a maximum design scenario has been assessed and mitigated for. Annex A to these responses provides the current outline proposals put forward by the Applicant, which have been agreed in principle with NCC and will be included within the Outline CTMP submitted at Deadline 9. The Applicant has also continued to seek feedback from Cawston Parish Council and Broadland District Council on the proposals.</p>
<p>5.C EXISTING HIGHWAY CONDITIONS AND PEDESTRIAN MOVEMENTS WITHIN THE VILLAGE (INCLUDING IN RELATION TO CAWSTON PRIMARY SCHOOL)</p> <p>5.C.1 Cawston Primary School has 160 children (114 families) and 30 staff, mostly arriving on foot, often needing to cross the B1145 several times to follow the footpaths. There is a crossing patrol near the school gates, at the junction with Howards Way. The pedestrian entrance to the school is off Howards Way; children are not allowed to use the drive directly off the B1145.</p> <p>Staff arrive from 0730; there is a spike in pedestrian traffic from 0830 – 0910 and 1500 – 1545.</p> <p>The Pre School has around 20 children with a fluid mix of half days and full days, a peak from 1200 to 1300.</p> <p>There are Breakfast and After School Clubs, used by 15 - 20 pupils who arrive from 0730 and leave up to 1800.</p> <p>The Red Rose football club uses the school's facilities at weekends, with 20 – 30 children, plus families, on Saturdays from 0930 to 1300 and similar numbers of</p>	<p>5.C.1 – 5.C.4 – The Applicant notes the information provided by Cawston Parish Council and would refer to information provided in Appendix 27 submitted at Deadline 7 (REP7-047) which confirms that the Applicant has committed to restricting Hornsea Three HGV movements past the primary school in Cawston during the sensitive morning period of between 07.30 – 09.00 am.</p> <p>The Applicant considers that, when considered in the round, the measures presented within Option 1, Revision 5 (Annex A of these response), offer a significant improvement to the existing environment around the school. These improvements comprise the introduction of a 20mph speed limit, gateway features, VAS signs and footway enhancements along the immediate link to access the Primary School. Therefore, the Applicant does not consider it necessary to restrict movements during the other time periods referred to by Cawston Parish Council. The proposals have been agreed in principle with NCC and will be included within the Outline CTMP submitted at Deadline 9.</p>

Interested Party Written Representation	Applicant's Response
<p>adults, plus coaches, etc, on Sundays from 1230 to 1600.</p> <p>5.C.2 Approximately 90 senior pupils travel to Reepham High School, in three coaches plus the scheduled 43 bus service. The first coach is timed to leave the village at 0816 and drop off at 1550. This window can be extended by 15 minutes either side.</p> <p>5.C.3 In school holidays the playing field is very popular with children of all ages. There will be pedestrians and cyclists visiting throughout the day. With a very narrow footpath and blind bends on the approach this has the potential to be a very dangerous spot.</p> <p>5.C.4 Pedestrians going to the school, bus stops, shops, village hall and playing field will all be using the narrow footpaths along the B1145, which for some will involve crossing the road several times because the footpath is only on one side and then swaps sides. In some places, like the old railway bridge, there is no footpath at all.</p>	
<p>5.C.5 The road surface is already badly worn in several places, especially the High Street. Subsidence has been noted at the old railway bridge on the western side of the village and there is a history of subsidence near Aspen Vale to the east. Cawston PC has a primary concern for the safety of residents and was extremely disappointed at the Applicant's response at the hearing, to the effect that Norfolk CC has designated the road as suitable for HGVs and therefore, despite all the warnings, no action was necessary on their part. Meanwhile NCC's position seems to be that no action is required at this stage since the Applicant will be required to make good any damage caused by construction work.</p>	<p>5.C.5 – The route through Cawston is identified as suitable for HGVs up to 44 tonnes. The Applicant has committed to not exceeding this weight limit, and as such the road and bridges along the B1145 are deemed suitable for movements such as those predicted for Hornsea Three. This position has been agreed with NCC, as the local highway authority. Reliance upon the information provided by the local planning authority is standard practice and would apply to various locations within the local road network for Hornsea Three, and equally to any other proposed development in the wider area.</p>
<p>5.D NOISE AND VIBRATION ASSESSMENT</p>	<p>The Applicant would refer to Appendix 26 submitted at Deadline 7 (REP7-</p>

Interested Party Written Representation	Applicant's Response
<p>5.D.1 Surveys were carried out 11 – 13 Feb, but, at the time of writing (13/3), no results have been shared by the Applicant. We have major concerns over the effects of noise and vibration on the right of residents to the peaceful enjoyment of their property.</p> <p>5.D.2 Residents who work from home have expressed concerns over the impact of noise and vibration on their ability to continue doing so.</p> <p>5.D.3 Other residents have pointed out that their properties are already being damaged due to vibration; if they are listed buildings the remedial work can be particularly expensive.</p>	<p>046) which provides an update on the construction Traffic Noise and Vibration Assessment for Cawston Village.</p>
<p>5.E PROPOSED HIGHWAY INTERVENTION SCHEME (INCLUDING CONSIDERATION OF PARKING ARRANGEMENTS AND MONITORING/ENFORCEMENT MEASURES) [REP6-017]</p> <p>5.E.1 A new Traffic Management Plan was only presented to us at the Hearing on 8th March, and we met the Applicant on Tuesday 12th March with Norfolk CC and Broadland DC to review this on site. Our initial responses are set out in a separate document. Given the limited time available we have not been able to consult fully and reserve the right to add further comments as necessary.</p> <p>5.E.2 This Plan only tries to address issues in the very centre of Cawston, ignoring the structural problems such as blind bends, narrow (or no) footpaths in sensitive spots, including the village hall, and dangerous bridges.</p> <p>5.E.3 At the site meeting on 12th March many concerns were expressed by the Council and residents, and demonstrated by observation of the behaviour of traffic using the B1145.</p> <p>5.E.4 The Applicant agreed to review the Plan and present a revised version as quickly as possible.</p>	<p>The Applicant would refer to Appendix 27 submitted at Deadline 7 (REP7-047) which provides responses to the feedback provided at the site visit held on 12th March 2019, as well as previous consultation with NCC and Cawston Parish Council. Since Deadline 7, minor updates have been made to the proposed outline traffic management scheme. Annex A to these responses provides the current outline proposals put forward by the Applicant, which have been agreed in principle with NCC and will be included within the Outline CTMP submitted at Deadline 9. The Applicant has also continued to seek feedback from Cawston Parish Council and Broadland District Council on the proposals.</p>

Interested Party Written Representation	Applicant's Response
<p>5.F HGV RESTRICTIONS RELATING TO PEDESTRIAN MOVEMENTS TO/FROM LOCAL SCHOOLS F</p> <p>5.F.1 Details of school times and activities are noted in paragraphs c1 and c2 above.</p> <p>5.F.2 When restricting the flow of HGVs and other traffic, allowance needs also to be made for pedestrian travel from/to home. Reasonable minimum periods might be 0745 to 0915, 1145 to 1315 and 1500 to 1630. That is 4.5 hours in the Applicant's 11 hour window, meaning traffic would be compressed into just 6.5 hours, ie 20 HGV movements per hour, much of which would fall within the NCC rush hour sensitivity bands. Norfolk Vanguard traffic would at least double this.</p>	<p>The Applicant would refer to the responses provided in respect to Cawston Parish Council's points 5.C.1 – 5.C.4.</p>
<p>5.G IMPLICATIONS FOR BRIDGES INCLUDING ANY NECESSARY MITIGATION</p> <p>5.G.1 Doubts over the capability of the bridges to cope with the proposed traffic have long been expressed, but the Applicant insists that the road is suitable, based solely on NCC's designation. On the ASI we pointed out the damage that has already occurred, also the subsidence and lack of footpath, with a blind bend, on the bridge near the village hall. We have previously provided a photo of the damaged bridge at Salle Beck</p> <p>5.G.2 The Council Chair has prepared a separate document discussing the bridge issue, which will also be submitted for Deadline 7</p>	<p>The Applicant would refer to the responses provided in respect to Cawston Parish Council's point 5.C.5.</p>
<p>5.H SCOPE FOR ALTERNATIVE HGV ROUTING AVOIDING CAWSTON (INCLUDING WHETHER A PROPORTION OF HGV TRAFFIC COULD USE ALTERNATIVE ROUTING)</p> <p>5.H.1 We consider that there has been insufficient consideration of alternatives to using the B1145 through Cawston. Possibilities might include</p>	<p>The Applicant would clarify that the 'compound sites' referred to in Cawston Parish Council's representation is assumed to be the storage area identified on Sheet 15 of the Onshore Works Plan. Storage areas will provide space for additional storage where sufficient space is not available within the onshore cable corridor itself (as described in paragraph 4.1.7.11 – 4.1.7.12 of the Outline CoCP (REP7-060). For the location specified, at Salle, the</p>

Interested Party Written Representation	Applicant's Response
<p>1. Moving the compound sites to more appropriate locations. The proposed site at Salle, for example, is on a dangerous bend.</p> <p>2. Developing the Heydon Road and local minor roads, with an extended haul road and a creative one way circulation.</p> <p>5.H.2 However, we would like to propose a more radical alternative, covering both Hornsea Three and Norfolk Vanguard, which has been developed by a member of the Parish Council. This is set out in detail on another of our Deadline 7 documents.</p>	<p>storage area would be accessed directly from the haul road within onshore cable corridor and as such would have limited effect on the functioning of the road junction once established. The locations of storage areas were established based on a variety of criteria including proximity to HDD locations, sensitive receptors (including flood zones) and where possible, residential properties.</p> <p>The Applicant has discussed various alternatives with NCC as the local highway authority. This has included the potential to use Crabgate Lane (South), Southgate Lane (Heydon Rd on some mapping) and Chapel Street. These discussions have indicated that there is no feasible alternative to the use of the B1145 through Cawston, which the Applicant notes, is designated as an HGV route, suitable for vehicles up to 44 tonnes. Further details on the analysis which has been undertaken will be provided in the Applicant's response to the ExA's Rule 17 directed to the Applicant issued on 19th March 2019, to be submitted at Deadline 9.</p> <p>In regard to the potential to build and utilise a joint haul road for Norfolk Vanguard and Hornsea Three, the Applicant would refer to its response to the detailed representation regarding this matter below in response to REP7-091.</p>

Response to REP7-087

Interested Party Written Representation	Applicant's Response
<p>RESPONSE TO ISH9 - TRAFFIC IMPACTS. ACTION POINT 14</p> <p>Cawston Parish Council was asked to act as a conduit for community views on the traffic impacts on the community. Below is a selection of comments received from local residents, many of whom feel they have not received adequate information on the proposed schemes.</p> <p>1 THE ATTACHED FLYER - APPENDIX 1</p> <p>The attached flyer was prepared by a resident over the weekend of 9-10 March and distributed through local shops.</p> <p>They wrote to the Parish Council....</p> <p>“ please make PINs aware that this was created this weekend, and began being distributed on Tuesday 12th March because at this late juncture we thought most of the Cawston residents were unaware of this proposed scheme. From the verbal responses to date we were right. We believe PINs had already received correspondence about lack of notification/ strange poster sites.</p> <p>To feedback also is the fact people are asking why hearings about Cawston are being held at a Norwich hotel when we have a large village hall here? Public transport from the village is limited and timings of meetings do not correspond to make attendance possible/easy”.</p> <p>The bridge is also used by pedestrians from the properties to the west and this includes children going to school and persons using electric wheelchairs.</p> <p>· The road bridge at Salle Beck is also a tight bend and it is difficult for cars to pass there let alone heavy goods vehicles. The existing bridge has already been damaged.</p>	<p>The Applicant has responded to each point below.</p> <p>1. The Applicant refers to the Consultation Report which sets out the public consultation that was undertaken prior to the submission of the Application (APP-034). The Applicant has sought to engage with Cawston Parish Council throughout the pre-application and post-application stage, including during the Examination. In respect to traffic matters, the Applicant has also engaged with the Cawston Parish Council Working Group, and subsequently directly with residents and local businesses through email correspondence and a site visit held on 12th March 2019. The Applicant welcomes feedback from the local community, particularly in respect to the development of the outline traffic intervention measures in Cawston. A summary of the feedback received prior to Deadline 7 was summarised in Appendix 27 submitted at Deadline 7 (REP7-047) and has informed the ongoing development of the outline intervention scheme.</p> <p>Since Deadline 7, minor updates have been made to the proposed outline traffic management scheme. Annex A to these responses provides the current outline proposals put forward by the Applicant, which have been agreed in principle with NCC and will be included within the Outline CTMP submitted at Deadline 9.</p> <p>In respect to the Examination hearing venues, the Planning Inspectorate identifies the locations for these to be held, based on a number of criteria to encourage participation by Interested Parties across the entire cable corridor. As noted, an accompanied site inspection included a visit to Cawston on 5th March 2019, and the Applicant hosted a separate site visit to</p>

Interested Party Written Representation	Applicant's Response
<p>· The Human Rights Act Article 1 of the first protocol; Protection of property gives the right to every person peaceful enjoyment of their possessions. This imposes an obligation on the state not to interfere with the peaceful enjoyment of property etc.</p> <p>Please fully consider the above points when coming to a decision and I hope that the relative peaceful nature of Cawston will be maintained.”</p> <p>These are typical of the comments Cawston Parish Council has received, both in writing and verbally. Some may already have been sent to PINS directly; we do not know. We do know of many other concerns which have been sent direct.</p> <p>APPENDIX 1</p> <p>Flyer produced by some Cawston High Street Residents, widely delivered in the centre of the village</p>	<p>Cawston on 12th March 2019 to discuss the emerging traffic management proposals.</p>

Interested Party Written Representation	Applicant's Response
<p>2. ANOTHER RESIDENT WROTE ...</p> <p>“As a resident of Cawston, and living on the main B1145 in the village, I have great concerns about the increase of HGV traffic through the village with the onset of land-based construction for the offshore wind farms.</p> <p>We already have a high volume of traffic through the village supporting the Winery and seasonal sugar beet HGV. Indeed, at times we can feel the vibrations in our house from passing HGVs. I am not a person for ‘NIMBYism’ and I support the construction of renewable power sources. However, it looks like the planners, as usual, have taken the easy option for traffic management or, lack of in this case.</p> <p>In my observations and looking on Google maps a route to take vehicles away from the village would be to continue north after Woodrow roundabout on the B1149, Holt Road, go over the old railway bridge and take the second left onto the Heydon Road. Then take the second left onto the country road, this brings you to Glebe Crescent by the old railway bridge at the bottom of the village. These are very quiet roads and would have minimum impact on the local population. Sadly, this route would still inconvenience the people at Glebe Crescent.</p> <p>Hopefully, the site meeting which was held on 5 March, can see how congested the village high street is with parked cars on either side from the Market place onwards. It does not take the ‘brains of a rocket scientist’ to appreciate the constriction at this point let alone the impact on the school and general village through traffic. Additionally, do not even think of making movements at night time, it is the only respite we get from the daily traffic.”</p>	<p>2. The Applicant has discussed various alternatives with NCC as the local highway authority. This has included the potential to use Crabgate Lane (South), Southgate Lane (Heydon Rd on some mapping) and Chapel Street. These discussions have indicated that there is no feasible alternative to the use of the B1145 through Cawston, which the Applicant notes, is designated as an HGV route, suitable for vehicles up to 44 tonnes. Further details on the analysis which has been undertaken will be provided in the Applicant’s response to the ExA’s Rule 17 directed to the Applicant issued on 19th March 2019, to be submitted at Deadline 9.</p> <p>As noted above, a summary of the feedback received prior to Deadline 7 was summarised in Appendix 27 submitted at Deadline 7 (REP7-047) and has informed the ongoing development of the outline intervention scheme. Since Deadline 7, minor updates have been made to the proposed outline traffic management scheme. Annex A to these responses provides the current outline proposals put forward by the Applicant, which have been agreed in principle with NCC and will be included within the Outline CTMP submitted at Deadline 9. In developing these outline designs, consideration has been given to the sensitive receptors present in Cawston, including existing traffic movement, pedestrian amenity and the primary school.</p> <p>The Applicant would refer to paragraph 2.1.6.7 of the Outline CTMP (REP7-045) which makes a commitment that no AIL movements from the main construction compound to the onshore cable corridor will occur during night-time hours (23:00 – 07:00 am). As such, there would be no night-time movements of abnormal loads through Cawston for the purpose of accessing cable sections 9 and 10.</p>

Interested Party Written Representation	Applicant's Response
<p>3. A THIRD SAID (BEFORE THE REVISED TRAFFIC MANAGEMENT PLAN WAS PRESENTED)</p> <p>"I have been reading through the proposed traffic arrangements for servicing the above project and in particular the proposed use of the B1145 which goes through the village of Cawston. I was born in Cawston and my family has lived in the village for in excess of 100 years.</p> <p>I have the following concerns associated with the proposal:</p> <ul style="list-style-type: none"> · The B1145 where it enters the village from the east passes Aspen Vale, this area between 1886 and 1927 was used to extract clay for brick making and as a result adjacent to the B1145 is a deep depression. The road embankment at this point is not at the correct angle for the soil type and I am concerned that with the proposed additional heavy goods traffic it will fail and the road will collapse. · There is a school a little further west on the B1145 and children are encouraged to walk to school the proposed addition traffic would make this more difficult. · The retaining wall supporting the properties on the south side of the B1145 between Cooks Hill and the Market Hill is already showing signs of deterioration and the proposed increase in heavy traffic is likely to accelerate the problem. <p>Market Hill; The proposed remodelling of the area by providing end on parking to the west and limited short term parking outside All Things Nice is not acceptable and will result in a major change to the historic character of the village. In addition businesses which rely on passing trade will be severely affected.</p> <p>In 1263 John de Burgh obtained a charter for a market every Wednesday and a fair on 1st and 2nd October, the proposed remodelling of the Market Hill will make this impractical should the village wish to reintroduce the market.</p> <ul style="list-style-type: none"> · The High Street has several listed buildings and by their very nature are likely to 	<p>3. The Applicant has considered these points and provided a response to concerns raised in this submission within the response to the representations grouped as 'Cawston Residents' submitted at Deadline 9 (where points have not already been addressed in Appendix 27 of Deadline 7 (REP7-047).</p>

Interested Party Written Representation	Applicant's Response
<p>be structurally affected by the proposed additional heavy traffic. Off street parking is also extremely limited in this area and the proposal to introduce no parking on the High Street and Chapel Street could well result in cars parking in inappropriate places with the potential to restrict emergency vehicles.</p> <p>· The old railway bridge at the west end of the village is already showing signs of subsidence and the additional heavy traffic will likely accelerate the existing problem. It is also an extremely tight bend and there is existing evidence of vehicles colliding with the structure.</p>	

Response to REP7-088

Interested Party Written Representation	Applicant's Response
<p>ISSUE SPECIFIC HEARING (ISH9): AGENDA ITEM 5G, CAWSTON RAILWAY BRIDGE CAWSTON PARISH COUNCIL CHAIRMAN'S RESPONSE</p> <p>I feel I must respond to the very disappointing reply to the Agenda item 5g, given by Orsted at the hearing that took place at The Mercure Hotel on Friday 8TH March. The question was "Implications for bridges including any necessary mitigation". The reply was that as Norfolk County Council rate this bridge as being able to take a load of more than 44 tonnes this meets their criteria and nothing else needed to be done to the bridge.</p> <p>The bridge in question is the old railway bridge just past our Village Hall, underneath it runs what is now known as Marriotts Way, which is very popular with walkers, cyclists and horse riders. From our first meeting with Orsted and at subsequent meetings we have voiced our concerns as to the suitability of this bridge to be able to cope with this extra HGV traffic. The bridge is narrow, the exit going from</p>	<p>The Applicant would refer to the responses provided in respect to Cawston Parish Council's point 5.C.5 of REP7-086 above.</p>

Interested Party Written Representation	Applicant's Response
<p>Cawston towards Reepham veers away sharply to your left so traffic coming towards the bridge from Reepham does not see what is coming towards them until the last minute, this then causes traffic on the bridge, especially HGV traffic to move over to their left which in turn causes the trailer to clip the bridge, an event which happens quite often as can be seen at this moment in time with the damage there at present.</p> <p>Two years ago the a whole pillar on this bridge was knocked off by an unknown vehicle travelling towards Reepham and obviously the pillar, weighing several tons fell onto the track below, thankfully with no one there at the time. Norfolk County Council rebuilt the bridge in such a different way, so as, in their words; it would not sustain the same damage again. Within a week it had been hit and has also been hit numerous times since as can be seen at present, as stated previously.</p> <p>Just over the bridge is a right hand turn into Heydon Long Lane and several properties are situated there, some have access to them via the Reepham Road, but many have their access from this right hand turn. Some of these households have children who attend Cawston Primary School and have to go over this bridge at least twice a day, as there is not a footpath over this bridge it is at present a difficult exercise, what it will be with this extra traffic is a bit unthinkable.</p>	

Interested Party Written Representation	Applicant's Response
<p>To dismiss local Council concerns with a bland statement such as it is weight rated and therefore we will not be doing any further work on this bridge is totally inadequate. According to several members of our Parish Council who have sat on the Council for 25 years plus, Norfolk Council offered to remove this bridge at one point in time as it was not then deemed suitable for the amount of traffic that was using it back then and to replace it with a straight bridge therefore taking the bend away, but the Parish Councillors at that time said no to the offer as making this straight would speed traffic through the Village.</p> <p>I do not know what sort of risk assessment is going to be put in place by Orsted, or even Vattenfall for that matter, for this bridge, but I can tell you, as will every other person in our Village, this bridge will be severely damaged at some point over the next few years with all the extra HGV traffic, I just hope and pray for the person signing off any risk assessment that no one using the bridge or anyone going under the bridge along Marriott's Way is not injured or suffer a worse fate. Profits of any Multi -National Company should not be put before the rights of anyone in the Local Community.</p>	<p>See above.</p>

Response to REP7-089

Interested Party Written Representation	Applicant's Response
<p>CAWSTON VILLAGE CENTRE. A PASSING PLACE FOR HGVS? EVIDENCE THAT THE B1145 IS TOO NARROW FOR HGVS TO PASS EACH OTHER IN MOST PLACES IN CAWSTON VILLAGE CENTRE</p> <p>This is photographic evidence of an incident which happened at 10.45am on March 5th, a few minutes before the arrival of the Accompanied Site Visit by of the</p>	<p>The Applicant would refer to responses provided in Appendix 27 of the Deadline 7 submission (REP7-047) as well as those above.</p>

Interested Party Written Representation	Applicant's Response
<p>Planning Inspectorate Panel.</p> <p>All pictures were taken from Ørsted's proposed location of the relocated bus stop on the north side of Cawston High Street.</p> <p><PICTURES></p> <p><i>1 THE CAR FACING THE MANOEUVRING LORRY WAITS AS THE LORRY TURNS.</i></p> <p><i>2 SECOND HGV PASSES PARKED CARS AND SQUEEZES PAST THE WAITING CAR</i></p> <p><i>3 THE NEXT CAR IN THE QUEUE TRAVELLING EAST PULLS OFF THE B1145 TO PROVIDE THE ONCOMING LORRY SPACE TO NEGOTIATE PARKED CARS TO THE RIGHT</i></p> <p><i>4 THE BLACK CAR, WHICH HAS BEEN WAITING FOR A WHILE, DECIDES IT TOO WILL SQUEEZE PAST A THIRD HGV WAITING TO TURN INTO CHAPEL STREET.</i></p> <p><i>5 THE BLACK CAR FINDS IT CANNOT SQUEEZE THROUGH THE GAP AND BRAKES</i></p> <p><i>6 THE BLACK CAR STRUGGLES TO REVERSE</i></p> <p><i>7 THE BLACK CAR GIVES UP TRYING TO DRIVE ON THE B1145 AND TURNS DOWN CHAPEL STREET</i></p> <p><i>8 HAVING FINISHED THEIR MORNING COFFEE AT CAWSTON'S DELI, A POWER LINE CREW RETURN TO THEIR VAN WHICH IS PARKED IN FRONT OF THE WHITE HOUSE AND GO BACK TO WORK WHILE THE NEXT HGV WAITS TO TURN.</i></p>	<p>See above.</p>

Interested Party Written Representation	Applicant's Response
<p>9 THE THIRD HGV IS ABLE TO COMPLETE ITS TURN INTO CHAPEL STREET.</p> <p>10 TRAFFIC WHICH HAS BEEN HELD UP NOW STARTS TO MANOEUVRE THROUGH THE MARKET PLACE.</p> <p>11 AFTER MORE THAN 3 MINUTES DELAY, THE USUAL PATTERN OF GIVE AND TAKE AROUND PARKED CARS RESUMES AS THE DELAYED TRAFFIC PASSES THROUGH.</p> <p>OBSERVATIONS</p> <p>Under current traffic conditions the safe passage of traffic through the village of Cawston on the B1145 can be difficult. Safe passage under current conditions relies on the good sense and patience of all road users.</p> <p>It is particularly difficult for HGVs, buses and coaches to negotiate their way through the village when they meet cars. It is even more difficult for HGVs, buses and coaches to pass each other in the centre of Cawston.</p> <p>Orsted proposal is for their HGV traffic to travel along the B1145 in both easterly and westerly directions. Orsted's own traffic is likely to meet in the village as well as meeting existing HGV traffic with the type of results shown here.</p>	
<p>These photographs represent the present situation, in a nominally quiet time of the day, when Orsted propose to move 12 HGVs an hour at peak, and 8 HGVs an hour otherwise. The effects of the 200 car journeys a day need to be added to these figures.</p> <p>CONCLUSION</p> <p>There are no places on the B1145 in the centre of Cawston where an HGV can safely pass an HGV coming in the other direction.</p>	<p>See above.</p>

Response to REP7-090

Interested Party Written Representation	Applicant's Response
<p>Response to revised traffic management plan presented by Hornsea 3 wind farm ltd 5th March 2019</p> <p>1.1 Surface Texture - NCC have already indicated this measure is unlikely to be permitted.</p> <p>1.2 Footway widened to min 1.2metres in front of white house both sides of road - Further restricts the narrowest section of B1145. Further restricts the width of Chapel St making it even more difficult and hazardous for Broadland Winery HGV traffic to negotiate the turn into Chapel Street Traffic approaching restriction from east cannot see what is coming around the corner on B1145 or Chapel Street so.....</p> <p>1.3 Existing Bus Stop Location slightly relocated and formalised with bus stop pole - The photograph shows a bus being boarded by school children. Buses stop in front of the Deli, not where the plan shows. School buses come down B1145 from east and also from Chapel Street. The bus already has difficulty negotiating the right turn onto the B1145 and then pulling to the side of road in front of Deli where the children wait. Moving the bus stop to the east as proposed makes the manoeuvre impossible. In Cawston, as in much of rural Norfolk, buses stop where they can get close to the kerb. A bus stop pole does not resolve problems of limited road widths and parked cars.</p> <p>1.4 Footway widened to 2 metres in front of the deli and bus stop – narrows the road to make passing by opposing traffic more difficult.</p> <p>1.4 Existing parking area to remain – Good. Existing arrangement enables some parking for local buisnesses.</p> <p>1.5 Eastbound bust stop relocated and formalised with bus stop pole - It is</p>	<p>1, 2 and 3. The Applicant notes the feedback from Cawston Parish Council and would refer to responses to other representations (made by CPC and Cawston Residents) as well as Appendix 27 of the Deadline 7 submission (REP7-047) which summarises similar feedback received during the recent consultation.</p> <p>Since Deadline 7, minor updates have been made to the proposed outline traffic management scheme. Annex A to these responses provides the current proposals put forward by the Applicant, which have been agreed in principle with NCC and will be included within the Outline CTMP submitted at Deadline 9.</p>

Interested Party Written Representation	Applicant's Response
<p>proposed to relocate the bus stop from Market Place in front of the White House to a new position by the Bell Inn parking area. Within living memory the bus stop was moved away from this location to avoid congestion when people were boarding the bus.</p> <p>1.6 Removal of the earlier scheme's yellow line parking restrictions and the formalising the extent of on street parking with marked limits - Presumably painted triangular areas, which remove some residents' parking in front of their properties. No additional parking places are provided for displaced traffic</p> <p>1.7 Marking the limits of on street parking - Marking the limits of on street parking would formalise the "chicane" which already exists in Cawston.</p> <p>1.8 A new width restriction on the b1145 opposite the old forge - A new width restriction on the B1145 opposite The Old Forge restricts the width of the B1145 at what is already one of its narrowest points. Larger traffic needs to make use of the full width of the road to negotiate the bend. Lack of vision around the bend by the Old Forge makes it difficult to see oncoming vehicles, even those approaching at 20 mph, until they are in the area of restricted width. When negotiating oncoming vehicles it is common for larger vehicles to mount the already narrow pavement.</p> <p>2. HGV passing - The widening of various pavements in the centre of the village reduces road width so making passing of HGV and other traffic more difficult.</p> <p>The Draft Traffic Management Plan drawing does not show on street parking areas in front of the properties on the north side of the High Street opposite the Booton Lane junction. This omission may be intended to imply that the B1145 in this location is wide enough for HGVs to pass safely which is not the case. Parked cars in this area narrow the road and residents' parking around the junction with Booton Lane. Any imagined HGV passing area in the centre of</p>	<p>See above.</p>

Interested Party Written Representation	Applicant's Response
<p>Cawston would rely on good fortune for HGVs to encounter each other at this one location and not anywhere else on the B1145 through the centre of Cawston. When HGVs arrive in the village they have often collected a stream of light or heavy traffic behind which removes the opportunity to reverse or manoeuvre freely.</p> <p>3. A touching reliance on the enforcement of traffic control measures.</p> <p>It is difficult to see how the Draft Traffic Management Scheme's reliance on compliance with a 20mph speed limit and variations to local parking measures can be secured.</p> <p>The B1145 in Cawston is not a priority area for speed limit enforcement and the Norfolk Safety Camera Team. It is rare to see a Police Officer in Cawston, on foot or in a car and our local Police Community Support Officer presence has been removed.</p> <p>4. Conclusion - The revised Draft Traffic Management Plan relies on a notional reduction of speed to 20mph to ensure that HGVs can safely pass through the centre of Cawston. The enforcement of any speed or parking restrictions is unlikely to be secured given the sporadic nature of rural policing and the removal of Police Community Support Officers.</p> <p>The reality of traffic movement on the B1145 through the village centre is that vehicles of any size meeting each other have difficulty in negotiating the narrow road and oncoming traffic. Present levels of HGV traffic can create an almost instant bottleneck at any one of a number of pinch points in the village.</p> <p>No amount of magical thinking by Ørsted can divert Cawston Parish Council from concluding that the predicted increases in HGV and light traffic will only exacerbate the already difficult situation</p>	<p>See above.</p>

Response to REP7-091

Interested Parties Written Representation	Applicant's Response
<p>HORNSEA PROJECT THREE OFFSHORE WIND FARM by Orsted Hornsea Project Three (UK) Ltd</p> <p>Cawston Parish Council has engaged with representatives of Hornsea 3 Offshore Windfarm Ltd, seeking to manage and mitigate the impact on Cawston Parish of the draft Development Consent Order. As a result of this process of engagement Cawston Parish Council is now able to present the following proposal.</p> <p>1 CAWSTON PARISH COUNCIL PROPOSAL</p> <p>The draft Development Consent Orders for both Hornsea and Norfolk Vanguard include plans for large increases in HGV and light traffic travelling through the village of Cawston on the B1145. Cawston Parish Council has developed a proposal which seeks to remove Hornsea and Norfolk Vanguard HGV traffic from the B1145 in Cawston by providing an alternative HGV routing to avoid the village.</p> <p>Cable route maps submitted with the Norfolk Vanguard draft Development Consent Order show a cable route passing to the south of Oulton on agricultural land and then crossing the B1145 after Salle Beck. Map of Cable Route Appendix 1</p> <p>Cawston Parish Council proposes that the developers of Hornsea 3, Norfolk Vanguard and Boreas wind farms should work together to construct a haul road adequate for HGV traffic along the proposed Norfolk Vanguard cable route between Oulton and the B1145 at Salle. This road should be used by both Hornsea 3, Norfolk Vanguard and Boreas HGV traffic to avoid using the B1145 in Cawston.</p>	<p>The Applicant notes the proposal put forward by Cawston Parish Council; however, this is not considered a feasible option for the reasons set out below.</p> <ul style="list-style-type: none"> • There is the potential for the construction of Hornsea Three and Norfolk Vanguard to be undertaken at the same, or similar time, and it is this scenario which has been assessed within the EIA prepared by Hornsea Three (i.e. the maximum design scenario). However, both projects are subject to separate Development Consent Applications, and as such must be capable of being delivered independently. This enables one project to be delivered if the other project's application for DCO is not granted, or if the construction programmes do not overlap; • Neither the Applicant nor Norfolk Vanguard have assessed the environmental impacts of both Hornsea Three and Norfolk Vanguard using the Norfolk Vanguard haul road in this location and therefore the environmental impacts of this proposal are unknown; • The haul road within the Norfolk Vanguard cable corridor may not be in place for the full duration of construction for both projects. Norfolk Vanguard have made commitments to reinstate land temporarily impacted along the onshore cable corridor once their construction works in that area are complete, and should this occur Hornsea Three traffic would not be able to use the haul road and would have to utilise the B1145 instead; • In order for the haul road to support the required level of HGV
<p>2 ACTIONS TO PUT THE PROPOSAL INTO EFFECT</p> <p>That Hornsea Project 3 Ltd works in close cooperation with Norfolk Vanguard Ltd to construct a temporary haul road suitable for HGV, abnormal loads and other traffic</p>	

Interested Parties Written Representation	Applicant's Response
<p>between Oulton and Salle, along the proposed course of the Norfolk Vanguard Ltd cable route.</p> <p>2.1 That Hornsea Project 3 Ltd and Norfolk Vanguard Ltd agree to use the new haul road for all HGV traffic and abnormal loads.</p> <p>2.2 That Hornsea Project 3 Ltd and Norfolk Vanguard Ltd agree to, where practicable, use the new haul road for light traffic for both projects.</p> <p>2.3 That the haul road is removed at the end of the construction period of both projects and the route is reinstated to its original condition.</p>	<p>movements for both Hornsea Three and Norfolk Vanguard on a daily basis, it would need to have a suitably robust specification to ensure longevity (for example it may need to be a different depth or material). This would likely require a greater number of HGV movements for the purpose of haul road construction, with resulting impacts on the local and wider road network, including along The Street at Oulton, which would be the main access onto the haul road;</p> <ul style="list-style-type: none"> • The Norfolk Vanguard cable corridor in this location includes a number of road crossings. Should any of these be crossed using trenchless technology, this would prevent the passage of HGVs along the entire haul road, and require the use of the B1145.
<p>3 OBJECTIVES OF THIS PROPOSAL</p> <p>3.1 To remove the requirement for HGVs to travel through Cawston on B1145</p> <p>3.2 To greatly reduce the potential for additional congestion in Cawston resulting from non-HGV traffic from both Hornsea 3, Norfolk Vanguard and a future Boreas project.</p> <p>3.3 To reduce the damage and degradation of agricultural land and the built environment by concentrating disruption and damage into one area which can be fully reinstated.</p> <p>3.4 To concentrate noise and vibration impacts of traffic into relatively uninhabited areas away from settlements.</p> <p>3.5 To divert the air pollution associated with increased traffic levels away from the central part of Cawston.</p> <p>3.6 To simplify the management of traffic flows associated with the cable route projects.</p> <p>3.7 To reduce travel distances and environmental impacts, including preventing</p>	<p>With the above in mind, Hornsea Three has not applied for the necessary powers to utilise land within the Norfolk Vanguard cable corridor, and no discussions with landowners have taken place. As there is a viable alternative along the B1145, which is designated as being suitable for HGVs above 44 tonnes, and the environmental impacts of the use of the B1145 have been assessed as not significant, there would not be a compelling case for the use of temporary possession powers across this land (which would be required to ensure the project could ultimately be delivered).</p> <p>In respect to other alternatives, the Applicant would refer to REP7-087 (part 2). Based on these Responses, discussions with NCC, and for the reasons set out above, it is concluded that the only viable option is to utilise the B1145. The Applicant does acknowledge the constraints through the village, and has developed an outline traffic management scheme which addresses these constraints. Since Deadline 7, minor updates have been made to the proposed outline traffic management scheme. Annex A to these responses</p>

Interested Parties Written Representation	Applicant's Response
<p>unnecessary carbon emissions from traffic, by forming a direct route between the Oulton Compound and the Hornsea 3 cable sections 9 and 10.</p> <p>3.8 To reduce the risk and costs to the developers arising from congestion in the village of Cawston and the B1145 bridges.</p> <p>3.9 To reduce the impact of wind farm cable route traffic on existing traffic flows.</p> <p>3.10 To reduce the costs of reinstatement of bridges and road surfaces at the end of the projects.</p> <p>3.11 A further benefit of this proposal is that will demonstrate a real commitment from the developers of both schemes to work together to protect and enhance the environment in Norfolk.</p> <p>Cawston Parish Council looks forward to working with all parties to make this proposal a reality.</p> <p>Cawston Parish Council 14th March 2019</p> <p>Appendix 1 Outline map showing course of proposed upgraded haul road.</p> <p>Appendix 2 Land Plan sheets 20-22, extracted from Nfk Vanguard EN010079-001322-2.02 Onshore Land Plans</p>	<p>provides the current proposals put forward by the Applicant, which have been agreed in principle with NCC and will be included within the Outline CTMP submitted at Deadline 9.</p> <p>Further details on the alternatives analysis which has been undertaken will be provided in the Applicant's response to the ExA's Rule 17 directed to the Applicant issued on 19th March 2019, to be submitted at Deadline 9.</p>

Response to REP7-092

Interested Party Written Representation	Applicant's Response
<p>CAWSTON PARISH COUNCIL, ENGAGEMENT WITH ØRSTED ON TRAFFIC IN CAWSTON AREAS OF AGREEMENT , DISAGREEMENT AND SUGGESTIONS</p>	<p>The Applicant notes the feedback from Cawston Parish Council and would refer to Appendix 27 of the Deadline 7 submission (REP7-047) which</p>

Interested Party Written Representation	Applicant's Response
<p>FOR MANAGEMENT AND MITIGATION</p> <p>Cawston Parish Council working group has met with Ørsted on 29th October 2018, 30th January 2019 and 12th February 2019. Site meeting in Cawston took place on Tuesday 12th March 2019</p> <p>1. AIMS OF ENGAGEMENT WITH ØRSTED</p> <p>Cawston Parish Council have engaged with Ørsted:</p> <ul style="list-style-type: none"> • To learn more about Ørsted's plans as they develop. • To maintain the level of amenity which Cawston residents currently enjoy • To work with Ørsted to identify issues raised by Ørsted's application • To work with Ørsted to identify effective management and mitigation strategies for the issues identified. • To work to inform Cawston residents about the nature of Ørsted's application • To represent the views of Cawston's residents to Ørsted, Norfolk County Council, Broadland District Council and The Planning Inspectorate. 	<p>summarises similar feedback received during the recent consultation, and how this has informed the development of the outline traffic management scheme. Annex A to these responses provides the current outline proposals put forward by the Applicant which has been agreed in principle with NCC.</p>
<p>2. DATA SOURCES</p> <p>Information and evidence about the Hornsea 3 project has been acquired from a range of sources:</p> <ul style="list-style-type: none"> • Ørsted has presented data showing their predictions of increased HGV traffic, Abnormal Loads and other vehicles traffic traveling through Cawston on the B1145. 	

Interested Party Written Representation	Applicant's Response
<ul style="list-style-type: none"> • Cawston Parish Council has made extensive use of the data deposited with the Planning Inspectorate as part of the Infrastructure Planning Examination Procedure. • The potential impacts on the amenity of the community, individual residents and both natural and built environments in Cawston have been identified by Cawston Parish Council and Ørsted. • Traffic survey data and Noise and Vibration impact surveys have been carried out at a limited number of locations. Full findings are awaited. • Members of the Cawston Parish Council working group have met with the Planning Inspectorate Team at the accompanied site visit and photographic evidence has been collected for submission • Ørsted have presented a draft Traffic Management Plan which seeks to manage and mitigate a number of the issues identified. • Ørsted have revised their draft Traffic Management Plan and a Site Meeting took place. 	<p>See above</p>
<p>3. AREAS OF AGREEMENT</p> <p>Issues which Cawston Parish Council and Ørsted have both agreed require management and mitigation:</p> <ul style="list-style-type: none"> • Pedestrian amenity – particularly close to the primary school and public transport pick-up/drop-off locations (e.g. bus stop) • Parking provision within the centre of the village and outside local businesses • Rural nature of the village 	

Interested Party Written Representation	Applicant's Response
<ul style="list-style-type: none"> • Associated noise and vibration impacts • Speed of vehicles travelling through the village <p>Source Hornsea Project Three_Cawston Traffic Summary_28.02.2019</p>	<p>See above</p>
<p>4. MITIGATION METHODS PROPOSED BY ØRSTED</p> <p>Changes in the project specification and management and mitigation strategies have emerged in the course of discussion with Ørsted</p> <ul style="list-style-type: none"> • Design of haul road changed with resulting reduced demands for aggregates and so fewer predicted HGV movements through Cawston. • Changes in the data selected to indicate numbers of HGV and light traffic movements are described and a change from total figures to representative rates per hour for HGVs. • Speed reduction measures through the village (to 20mph) • Widening of footways in some parts of village • Proposal to restrict Ørsted HGV movements through the village at times identified, by Ørsted, as peak risk. • Planned reduction in size of cable drums used to allow more use of standard size HGVs. <p>A Traffic Management plan has been devised and revised by Ørsted which is intend to provide mitigation of the impacts listed above. The plan has undergone a revision in response to some of the feedback received.</p>	
<p>5. AREAS OF DISAGREEMENT</p> <p>No agreement has been reached with Orsted on two issues which Cawston Parish</p>	

Interested Party Written Representation	Applicant's Response
<p>Council have identified as requiring management and mitigation.</p> <ul style="list-style-type: none"> • Lost amenity throughout the village due to Increased congestion and conflict for road space in centre of Cawston • The risk of damage to property, injury to road users and to users of the Marriot's Way footpath, bridleway and cycle route at two bridges; where the B1145 crosses the Marriotts Way and where the B1145 crosses Salle Beck between Cawston and Salle. <p>These issues have yet to be fully acknowledged by Ørsted. Management and mitigation strategies which are likely to be effective have yet to be presented.</p> <p>Cawston Parish Council representatives have repeatedly raised with Ørsted their concerns about increased traffic congestion. Even with existing traffic levels, the narrow nature of the B1145 makes it very difficult for vehicles of any size to pass in the centre of the village and on the two bridges.</p> <p>Cawston Parish Council believe that the loss of amenity in Cawston resulting from congestion and conflict from increase traffic flows has yet to be fully acknowledged as issues requiring effective management and mitigation by Ørsted.</p> <p>In essence Ørsted's Draft Traffic Management Plan seeks to reduce the speed of traffic to a maximum of 20 mile per hour on the B1145 as it passes through the village. Footways on the B1145 in the village are sporadic and sometimes narrow. The selective widening of some footways reduces the width of the road, making passing more difficult.</p> <p>Cawston Parish Council continues to raise concerns that the level of traffic increase resulting from the Ørsted project will increase congestion in the village centre and on the old railway bridge and bridge crossing Salle Beck. The numbers of additional HGV movements and HGV traffic meeting in the village pinch points will</p>	<p>See above</p>

Interested Party Written Representation	Applicant's Response
<p>create an unacceptable loss of amenity to the village and an unacceptable increase in risk of collision, injury, damage to property and delay to road users, including delays to Ørsted's own traffic.</p>	
<p>6. MANAGEMENT AND MITIGATION STRATEGIES PROPOSED BY CAWSTON PARISH COUNCIL</p> <p>Cawston Parish Council have repeatedly suggested that alternative routes for Ørsted traffic, particularly HGVs and exceptional loads, should be fully investigated and considered</p> <p>In an attempt to constructively engage with Ørsted to achieve satisfactory Management and Mitigation strategies Cawston Parish Council offers the following suggestions for full investigation by Ørsted:</p> <ul style="list-style-type: none"> • Use of the minor road network to the north of Cawston, including mitigation and reinstatement. • Extension of temporary haul roads across agricultural land to provide a temporary Cawston bypass, a safe route from Oulton to the cable runs with exclusive Ørsted use. • Investigation into possibilities of relocation of mobilization areas away from B1145 to reflect a changed understanding if the carrying capacity of the transport network. <p>To date these suggestions have gained no response from Ørsted other than their dismissal. No evidence has been presented by Ørsted which suggests proper consideration has taken place into alternative routes to divert some, or all, of the Ørsted traffic away from Cawston.</p> <p>Ørsted have suggested that Norfolk County Council, the Highways Authority, will not allow any diversion onto the minor road network. At the Hornsea 3 Issue</p>	<p>In respect to the three suggestions proposed by CPC, the Applicant would note the following:</p> <ul style="list-style-type: none"> • The Applicant has explored and discussed the use of the wider road network to the north of Cawston to minimise the flows which would occur through Cawston. Alternatives considered have included the potential to use Crabgate Lane (South), Southgate Lane (Heydon Rd on some mapping) and Chapel Street. These discussions with NCC have indicated that there is no feasible alternative to the use of the B1145 through Cawston, which the Applicant notes, is designated as an HGV route, suitable for vehicles up to 44 tonnes. Further details on the analysis which has been undertaken will be provided in the Applicant's response to the ExA's Rule 17 directed to the Applicant issued on 19th March 2019, to be submitted at Deadline 9. • In regard to the potential to build and utilise a joint haul road for Norfolk Vanguard and Hornsea Three (as detailed by CPC in a separate representation, REP7-091), the Applicant would refer to its response to the detailed representation regarding this matter above in response to REP7-091. • The Applicant would refer CPC to its response to point 5.H.1 of REP7-086 which clarifies the use of the Hornsea Three storage area close to Salle. Hornsea Three is not proposing any mobilisation areas, and the closest secondary compound is located to the south, near Little Witchingham, which would not be accessed via the B1145

Interested Party Written Representation	Applicant's Response
<p>Specific Hearing 9 on 8th March 2019 comments from the Highway Authority suggest Norfolk County Council is open to considering alternatives to routing all traffic through Cawston.</p>	<p>through Cawston.</p> <p>The Applicant does acknowledge the constraints through the village, and has developed an outline traffic management scheme which addresses these constraints. Since Deadline 7, minor updates have been made to the proposed outline traffic management scheme. Annex A to these responses provides the current proposals put forward by the Applicant, which have been agreed in principle with NCC and will be included within the Outline CTMP submitted at Deadline 9.</p>
<p>To date Ørsted have proposed no management or mitigation measures whatsoever for the narrow and awkward B1145 bridge over Salle Beck. Given the acute angle of approach to the bridge from both directions a minimum provision of Stop-Go Boards on east and west approaches to the bridge would seem a minimum intervention to prevent HGVs meeting on the bridge and being unable to manoeuvre past each other or reverse back due to following traffic and sharp bends.</p> <p>For the old railway bridge over the Marriott's Way recreational path the only mitigation measure proposed by Ørsted is to introduce a 20mph limit, in an area where traffic already moves very slowly to negotiate the narrow bridge. The issue for this bridge is its narrowness and the awkward angle of entry from the Salle direction. The regular and extensive damage to the bridgeworks and surrounding fences speak to the difficulty heavy traffic experiences when manoeuvring under existing traffic conditions. There has been no suggestion from Ørsted that a Risk Assessment has been carried out into the effect of impacts on the bridge on road users or on walkers below on Marriott's Way when a bridge strike occurs.</p> <p>At the Hornsea 3 Issue Specific Hearing 9 on 8th March 2019 Ørsted were invited to respond to agenda item 5h Scope for alternative HGV routing avoiding Cawston</p>	<p>The Applicant would refer to Appendix 27 of the Deadline 7 submission (REP7-047) which summarises similar feedback received during the recent consultation, and how this has informed the development of the outline traffic management scheme.</p>

Interested Party Written Representation	Applicant's Response
<p>(including whether a proportion of HGV traffic could use alternative routing). At the hearing Ørsted representatives agreed to investigate alternatives. The action points for the meeting include for Ørsted to investigate alternative HGV routing to try to minimise traffic through Cawston.</p> <p>The reasons for Ørsted's reluctance to properly investigate alternative routings for traffic to minimise traffic through Cawston must remain a subject for speculation at present. The cost of mitigation measures has not been specifically stated by Ørsted as a reason for alternatives have not been investigated or proposed to date but it is telling that at the beginning of Cawston PC's first meeting with Ørsted representatives it was stated "you are not going to get a bypass".</p>	
<p>CONCLUSION AND FUTURE ACTIONS</p> <p>Cawston Parish Council remains committed to resolving all of the issues which arise from the Hornsea 3 Wind Farm project's effects on the village of Cawston.</p> <p>It seems that Ørsted has no alternative plan for its HGV traffic other than to send it all along the B1145 through Cawston, a road which is widely regarded as inadequate for greatly increased HGV traffic and abnormal loads. Ørsted seems content to overlook the very real danger of injury, damage and disruption it will cause by concentrating HGV and abnormal load traffic in the village of Cawston.</p> <p>It is difficult to believe that such a significant international business, making such a major investment, has yet to consider an alternative plan for its traffic in the event of a problem on the B1145.</p> <p>Cawston Parish Council fervently hope and anticipate that Ørsted will now, belatedly, engage in full consideration of alternative routes and approaches to remove or reduce traffic from the B1145 in Cawston.</p>	<p>The Applicant notes CPC's feedback, and has provided responses to each point above, including the consideration of alternatives. The Applicant does acknowledge the constraints through the village, and has developed an outline traffic management scheme which it considers addresses these constraints. Annex A to these responses provides the current outline proposals put forward by the Applicant, which have been agreed in principle with NCC and will be included within the Outline CTMP submitted at Deadline 9. This position will also be set out in the Statement of Common Ground between the Applicant and NCC submitted at Deadline 9.</p>

National Grid Electricity Transmission Plc (NGET) and National Grid Gas Plc (NGG) Written Representation (REP7-096)

Response

Interested Party Written Representation	Applicant's Response
<p>We are instructed by National Grid Electricity Transmission Plc (NGET) and National Grid Gas Plc (NGG). We can now confirm that the Applicant and NGG have now agreed protective provisions and have completed the necessary documents required to safeguard NGG's existing apparatus. We therefore confirm that NGG withdraws its objection to the Order.</p> <p>The Applicant and NGET have agreed protective provisions and the drafting of the necessary land documents and it is anticipated that the agreements can be concluded in the next 7 days or so. In light of the progress that has been made and in the interests of expediency and costs, NGET does not intend to attend Issue Specific Hearing 9 to be held on 8 March 2019. However until the documentation is executed and its objection withdrawn, National Grid relies on its written submissions and wishes to reserve its position to attend any further hearings or submit further detailed representations before the close of the Examination on 2 April 2019. A further update will be provided in accordance with Deadline 7.</p>	<p>The Applicant notes the withdrawal of NGG's objection.</p> <p>In respect of NGET please see the Applicant's response below to REP7-097.</p>

National Grid Electricity Transmission Plc (NGET) Written Representation (REP7-097)

Response

Interested Party Written Representation	Applicant's Response
<p>We are instructed by National Grid Electricity Transmission Plc (NGET). Further to our last correspondence on 7 March 2019, the parties are in the process of executing the necessary agreements. It is anticipated that the agreements will be concluded in the next 7 days, however until the agreements are completed and its objection withdrawn, NGET relies on its written submissions and reserves its position to attend any further hearings or submit further detailed representations before the close of the Examination on 2 April 2019.</p>	<p>The agreement between NGET and the Applicant is expected to be executed imminently, after which NGET is expected to confirm that its objection is withdrawn.</p>

Cadent Gas Limited Written Representation (REP7-098)

Response

Interested Party Written Representation	Applicant's Response
<p>We are instructed by Cadent Gas Limited ("Cadent"). The parties have now agreed protective provisions and have completed the necessary documents required to safeguard Cadent's existing apparatus. We therefore confirm that Cadent withdraws its objection to the Order.</p>	<p>The Applicant notes the withdrawal of Cadent Gas Limited's objection.</p>

Eastern Power Networks Written Representation (REP7-099)

Response

Interested Party Written Representation	Applicant's Response
<p>I write to you on behalf of Eastern Power Networks plc (EPN) the Distribution Network Operator for East Anglia. EPN wishes to withdraw its objection to the Hornsea Project Three DCO as it has reached a compromise agreement with the developers to protect its assets.</p>	<p>The Applicant notes the withdrawal of Eastern Power Networks' objection.</p>

Marine Management Organisation Written Representation (REP7-103 & REP7-104)

Response

Interested Party Written Representation	Applicant's Response
<p>1 Outstanding Issues on the Development Consent Order (DCO) and the Deemed Marine Licenses (DMLs)</p> <p>1.1 Article 37 – Arbitration</p> <p>The MMO remains its position as set out in our Deadline 3 response [REP3 – 092]. The MMO welcomes the recommendation made by the Examining Authority to exclude the MMO from arbitration.</p> <p>The MMO would like to highlight that this recommendation is in line with the Tilbury 2 Application, which was determined by the Secretary of State (SoS) on the 20 February 2019. Within the decision of the SoS, the Examining Authority's recommendation regarding arbitration within the DCO/DMLs was accepted. For your information the recommendation is shown below:</p> <p>In the MMO's submission at Deadline 7 [REP7-033], the MMO stated that it strongly opposed the inclusion of such a provision, based on its statutory role in enforcing the DML. According to the MMO, the intention of the PA2008 was for DMLs granted as part of a DCO in effect to operate as a marine licence granted under the MCCA2009. There was nothing to suggest that after having obtained a licence it should be treated any differently from any other marine licence granted by the MMO (as the body delegated to do so by the SoS under the MCAA).</p> <p>Having considered the arguments of the Applicant and the MMO, the Panel finds in favour of the MMO in this matter for the reasons stated in the paragraph above. Accordingly, the Panel recommends that paragraph 27 is deleted from the DML at Schedule 9 of the draft DCO.</p>	<p>The drafting set out by the ExA in its schedule of changes (dated 26 February 2019) did not constitute a recommendation. Rather, the ExA sought comments on whether the drafting proposed would be adequate <i>if</i> the ExA or SoS adopted the positions taken by IPs.</p> <p>As set out in previous representations on this point (such as the Applicant's responses to Q1.13.14 and Q1.13.61, and oral points during Issue Specific Hearing 3), the Applicant considers that, consistent with previous DCOs decided by the Secretary of State, that all parties should be subject to arbitration.</p> <p>Regarding Tillbury 2, the Applicant notes that whilst the Examining Authority for that application agreed to remove the arbitration provisions in the deemed marine licence, the equivalent provision for Article 37 does not provide expressly for the MMO not to be subject to Arbitration, and therefore the requested rewording is not in line with the wording of that Order.</p> <p>The decisions of the relevant planning authority in respect of the discharge of Requirements relating to onshore matters are subject to the TCPA 1990 appeal provisions as modified and transposed by Article 38 of the dDCO. This is a standard provision of made DCOs.</p> <p>By way of further example, the Applicant has also previously referred to the analogy of a S.106 Agreement in which LPAs regularly agree to their statutory duties and enforcement functions under such agreements being subject to dispute resolution mechanisms, including arbitration.</p>

Interested Party Written Representation	Applicant's Response
<p>As such, the MMO feels that the recommendation made by the Examining Authority is consistent with the SoS decision.</p>	
<p>1.2 Article 38 – Requirements, Appeals, etc.</p> <p>The MMO retains its position as set out in our Deadline 6 response [REP6 – 072] regarding the newly introduced appeals process. The MMO welcomes the recommendation to remove the proposed appeals process as included in the Applicant's draft DCO submitted at Deadline 6. As highlighted in the MMOs deadline 6 response, it is still unclear to the MMO why there is the requirement for the inclusion of this appeals process.</p> <p>The MMO would like to further highlight that the reasoning that was used and agreed to for Tilbury 2 is similar to the reasoning the MMO provided for this application, and as such the MMO does not agree that this appeals process should be included in the DCO.</p>	<p>The Applicant repeats its submissions above.</p>
<p>Schedule 11 and 12 – Deemed Marine License</p> <p>1.3 Condition 2 – Cable protection</p> <p>The MMO retains its position regarding the deployment of cable protection as set out in the MMOs deadline 6 response [REP6 – 072]. Additionally, the MMO would like to highlight that in some instances, the MMO has licensed the deployment of cable protection for the operational phase of a project for cable crossings repairs only. In all licenses, the deployment of cable protection was restricted not only by volume, but also by location and the requirement for the methodology to be approved by the MMO prior to any works being undertaken.</p> <p>There is significant difference between the two scenarios – the licensing of cable protection for cable crossing and the licensing of cable protection to mitigate against exposed cables over the lifetime of a project. As outlined previously, the</p>	<p>The Applicant's position is that a limit to construction phase is not necessary. However, on a without prejudice basis, the Applicant will provide wording in the draft DCO as submitted at Deadline 9.</p> <p>As set out in the Applicant's response to the MMO's Deadline 6 response (see page 85 of REP7-007), the Applicant has sought to take a holistic approach to the assessment of the effects of cable protection for the lifetime of the project and to have the ability to install cable protection during construction or during the operation and maintenance phase. This was to remove the need for further marine licence applications post-consent for any potential cable protection required during the operation and maintenance phase and the associated increase in resource demands on MMO and SNCBs. The Applicant's position is that the Cable Protection Plan (Section 5 of the outline Cable Specification and Installation Plan; REP7-021) would be a live document which would be</p>

Interested Party Written Representation	Applicant's Response
<p>operation phase of a project can be 25 years or longer and the MMO strongly questions, whether it is appropriate to license works for which currently the locations, timings, impacts and who it may affect is unknown. The MMO is of the opinion that it is unrealistic to assess the impacts of such unknowns ecologically, socially and economically of what is a wide ranging open consent.</p> <p>In previous license decisions, the MMO has refused to give consent to such works as there are too many unknown factors involved. To allow for a fair and transparent consenting process, the MMO is required to allow all impacted parties the opportunity to review an application and provide representations ahead of any decision being made. As such, the MMO questions how any of the stakeholders can know at this moment in time, how they may be impacted by cable protection measures 30 years into the future, and how environmental evidence against such an activity may have improved by that time. As such the MMOs position remains that a new license application is required for the deployment of cable protection once the construction of the project or any phase has been completed.</p>	<p>used both in the construction phase and the operation and maintenance phase of the project. This would provide the necessary mechanism whereby the MMO and relevant SNCBs would be consulted on and agree any cable protection measures to be deployed within designated sites throughout the project lifetime (as well as any other remedial burial operations which may be attempted prior to use of cable protection).</p>
<p>1.4 Condition 14 - Timescales</p> <p>The MMO has remaining concerns regarding the timescales for the submission of preconstruction documentation. The MMOs position is set out in our Deadline 3 response [REP3 – 092].</p> <p>Following the publication of the Examining Authorities schedule of changes to the draft DCO, we would like to reemphasize the importance of this recommendation. The MMO has significant concerns regarding the feasibility of approving pre-construction documentation in a 4 month timescale. In addition to the points previously outlined, the MMO is expecting an increasing amount of issues to be resolved during the pre-construction sign off phase due to the increasing amount of in-combination impacts that can be expected over the next few years. Recently</p>	<p>The Applicant notes the MMO's concerns, however, it considers that 4 months as proposed is adequate as the MMO will be subject to pre-submission consultation. This consultation is in the interests of the undertaker, as it will ensure that documents submitted stand a good chance of agreement. 4 months is therefore a sensible compromise to ensure that the project programme is abided by but also to give the MMO adequate time to review any final changes since consultation occurred.</p>

Interested Party Written Representation	Applicant's Response
<p>the government made an announcement that it is expected that a minimum of 30% of our energy supply will be derived from offshore wind power generation by the year 2030. This increasing trend has already started as we are aware of the announcement of an additional 8 windfarm extension proposals, combined with the round four leasing round in the not too distant future. This adds a significant amount of complexity from in-combination impacts to the sign off process. It is crucial for the MMO to have sufficient time to make a well informed decision, without additional pressure being added from other factors such as tight construction programmes and potential financial loss by the applicant due to booked vessels. The MMO and its advisors need the appropriate amount of time to fully analyse the information at hand to make informed judgements and decisions. This extremely important process should not be governed by an applicant's individual schedule requirements. Also the MMO is always open to discussion with developers regarding expediting certain requirements in a shorter timeframe, should individual requirements demand it and therefore feels it is unnecessary to formalise timescales as suggested.</p>	
<p>1.5 Condition 14 - Timescales for the submission of pre-construction survey plans</p> <p>Following the MMOs review of the updated DCO provided at deadline 6, the MMO recommends for the following condition to be included in both Schedule 11 and 12 to define the submission deadline for monitoring plans:</p> <p>Pre-construction plans and documentation are to be submitted to the MMO in accordance with the following—</p> <p>(a) at least six months prior to the first survey, detail of the pre-construction surveys and an outline of all proposed monitoring;</p> <p>(b) at least six months prior to construction, detail on construction monitoring;</p>	<p>The Applicant included this wording in the draft DCO as submitted at Deadline 7 but with a 4 month timescale rather than the six months proposed by the MMO, for the reasons outlined above.</p>

Interested Party Written Representation	Applicant's Response
<p>(c) at least six months prior to commissioning, detail of post-construction (and operational) monitoring; unless otherwise agreed in writing with the MMO.</p>	
<p>1.6 Condition 18 – Construction monitoring The MMO remains its position regarding the proposed amendments to condition 18 (3) and welcomes the proposed changes to the DMLs made by the Examining Authority. Please refer to the MMOs deadline 5 response for the detailed reasoning behind this request [REP5 – 029]. The MMO advised that similar recommendations had been made for the Norfolk Vanguard and the Thanet Extension offshore wind farms draft DCO representations.</p>	<p>The Applicant included the second set of wording as presented by the ExA without prejudice to its firm position that this is not required as the MMO has appropriate enforcement powers under the Marine and Coastal Access Act 2009. Therefore, the Applicant considers that its proposed draft wording is sufficient.</p>
<p>2 Outstanding Environmental Concerns 2.1 Benthic Ecology Following on from the MMOs submission at Deadline 6 [REP6 – 072], further discussions with the Applicant have taken place in relation to the proposed scour pit monitoring using swath bathymetric surveys at the Silver Pit and Markham's Hole. The Applicant has agreed to undertake the proposed monitoring and as such, the In Principle Monitoring Plan (IPMP) and the relevant DML conditions will be updated. The MMO recommends for three turbines location within the Silver Pit and three turbine locations within Markhams Hole to be monitored. Each site should be monitored using high quality swath bathymetry systems out to a distance of 150m or further if features can be observed that could be attributed to the scour creation. This should be undertaken annually every summer for 3 years and within +/- 1 month of initial survey month.</p>	<p>The Applicant can confirm that a commitment to scour monitoring was included in the latest version of the IPMP as submitted at Deadline 7 (REP7-020). Regarding the proposed level of detail by the MMO, the Applicant has explained to the MMO that the level of detail (e.g. precise turbine locations monitored, exact timing of surveys etc.) has not been included for the other monitoring proposals and therefore the Applicant does not feel it is appropriate to include this level of detail for scour monitoring at this stage (ie. pre-consent). As with the other monitoring commitments, the detailed scope of the surveys will be fully developed and signed off by the MMO post consent. A key factor for the scour monitoring will be the final turbine layout, which will inform which foundations would be most appropriate for monitoring within the two features the MOO have outlined. The Applicant would therefore not recommend specifying which locations are monitored, as these are not yet fixed.</p>
<p>2.2 Fish and Shellfish</p>	<p>The Applicant welcomes this comment from the MMO and can confirm that this</p>

Interested Party Written Representation	Applicant's Response
<p>Following on from the MMOs submission at Deadline 6 [REP6 – 072], further discussions with the Applicant have taken place in relation to the monitoring of preferred sandeel habitat. In our Deadline 6 response, the MMO requested further clarifications from the Applicant. In response, the Applicant proposed to undertake sandeel habitat monitoring through the use of geophysical surveys associated with the monitoring of sandwave clearance activities. Additionally, the Applicant has confirmed that such monitoring activities will be undertaken in the Electric cable corridor and the Array area where preferred sandeel habitat was identified in the Environmental Statement. As such, the IPMP will be updated.</p>	<p>commitment to sandeel habitat monitoring was included in the latest version of the IPMP as submitted at Deadline 7 (REP7-020).</p>
<p>2.3 In Principle Monitoring Plan</p> <p>The MMOs position remains as outlined in our Deadline 5 response [REP5 – 029] that the minimum monitoring requirements of 3 years should be made explicit within the IPMP. The MMO is not aware that this has been addressed by the Applicant.</p>	<p>The Applicant notes that the commitment to monitor for a minimum of 3 years across all monitoring commitments is not standard practice. Indeed the Applicant has made clear that it considers this approach a divergence from best practice where monitoring is adaptive. That is to say, the need for further monitoring beyond the first post construction monitoring survey is determined by the results of that survey. The Applicant would highlight that this view is acknowledged within the MMO's review of monitoring for offshore wind (MMO, 2014 (submitted at Appendix 2 to Deadline 8)) where it is stated (in relation to scour monitoring) <i>"It is recommended that the frequency of surveys is tailored and defined based on the susceptibility of OWF foundations and/or cable infrastructure to the effects of scour – it would be advisable that scour monitoring conditions be drawn up with the developer and their installation/structural engineers"</i>. The Applicant believes that its approach to monitoring is in keeping with the spirit of this recommendation. It may transpire that for some parameters 3 years of monitoring is appropriate, but for others that may be excessive. The Applicant suggests that a proportionate and flexible</p>

Interested Party Written Representation	Applicant's Response
	<p>approach be taken. Therefore, the Applicant would be willing to include the following statement within the IPMP:</p> <p><i>Monitoring will take place for a minimum of 3 years (which may be non-consecutive years) unless agreed otherwise in writing by the MMO, or monitoring indicates before the third year of monitoring that significant impacts are not occurring, or that an equilibrium has been reached.</i></p>
<p>3 MMOs comments on Appendix 4 to Deadline 6 submission - Rock Protection Decommissioning Methods</p> <p>3.1 The MMO notes the additional documentation [REP6 – 018] submitted at deadline 6. The MMO would like to highlight that the submitted document is part of the documentation submitted in support of an ongoing marine licence application for Race Bank and the MMO has not yet taken a decision on this documentation or licence. Without prejudice to the MMO's decision on the Race Bank application, we note that the additional documentation does not provide sufficient evidence to address our concerns regarding the ability to decommission cable protection in a manner that allows for full recovery of the habitat.</p> <p>Following consultation with Natural England the MMO has provided an interim response on the documentation submitted as part of to the Race Bank application and has quoted these comments below for your reference. In relation to Annex 2 JdN 'Technical note for decommissioning Race Bank Export Cable rock protection' we have the following advice: -</p> <ul style="list-style-type: none"> ·Whilst the document demonstrates that dredging of rock is possible the example provided is very different to sensitively decommissioning rock armouring within designated sites. ·The example supplied provides no detail on the nature, the location or the 	<p>The Applicant provided at Deadline 7 clarifications on the recovery of subtidal sediment habitats following dredging, including mixed and coarse sediments. These can be found at paragraphs 4.27 to 4.30 of REP7-009.</p> <p>The Applicant will provide details at Deadline 9 of a commitment to validating the ability to decommission rock protection, including field trials, to demonstrate the effectiveness of the methods proposed (or similar methods) to decommission rock protection in environments similar to the Wash and North Norfolk Coast SAC and North Norfolk Sandbanks and Saturn Reef SAC. This will also investigate efficiencies which could be made to minimise impacts on seabed habitats.</p>

Interested Party Written Representation	Applicant's Response
<p>overarching sediment type. Additionally the examples failed to explain the methodology and proposed final outcome of the works. Further detail should have been provided on what the seabed looked like before and after the works and a comparison to the surrounding habitat should have been provided. Here the question of whether the dredging in itself did have any wider impacts, should have been explored further.</p> <ul style="list-style-type: none"> · There is no assessment of how analogous these examples are to what is required for Race Bank. · Section 2.6.5 - The drag Head vertical accuracy to 30cm means that it is unlikely that the seabed will be returned to it's previous state. For instance a remaining layer of 30cm of Norwegian granite in areas in less mobile sediment as proposed in the Wash means a permanent change in the habitat. Similarly the same is true if dredging is undertaken to 30cm below the seabed as habitat will be permanently removed and as with the existing trenches is unlikely to recover.' 	
<p>1 The MMOs comments on the Report on the Implications for European Sites (RIES)</p> <p>1.1 The MMO has reviewed the RIES that was submitted on the 21 February 2019. The MMO defer to the position of Natural England as the Statutory Nature Conservation Body (SNCB).</p>	<p>This is acknowledged.</p>
<p>2 The MMOs comment of the Examining Authority's Schedule of Changes to the draft Development Consent Order (DCO)</p> <p>2.1 The MMO has reviewed the Examining Authority's schedule of changes that was submitted on the 26 February 2019 and would like to make the following comments.</p>	<p>The Applicant's comments on arbitration are set out in response to the MMO's paragraph 1.1 above.</p>

Interested Party Written Representation	Applicant's Response
<p>2.2 Article 37 (page 29) - Arbitration</p> <p>The MMO welcomes the recommendation to make it explicit within the Article that any matter for which consent or approval of the MMO is required under any provision of this Order shall not be subject to arbitration.</p> <p>The MMO would like to highlight that this recommendation is in line with the Tilbury 2 Application, which was determined by the Secretary of State (SoS) on the 20 February 2019. Within the decision of the SoS, the Examining Authority's recommendation regarding arbitration within the DCO/DMLs was accepted. For your information the recommendation is shown below:</p> <p>In the MMO's submission at Deadline 7 [REP7-033], the MMO stated that it strongly opposed the inclusion of such a provision, based on its statutory role in enforcing the DML. According to the MMO, the intention of the PA2008 was for DMLs granted as part of a DCO in effect to operate as a marine licence granted under the MCCA2009. There was nothing to suggest that after having obtained a licence it should be treated any differently from any other marine licence granted by the MMO (as the body delegated to do so by the SoS under the MCAA).</p> <p>Having considered the arguments of the Applicant and the MMO, the Panel finds in favour of the MMO in this matter for the reasons stated in the paragraph above. Accordingly, the Panel recommends that paragraph 27 is deleted from the DML at Schedule 9 of the draft DCO.</p> <p>As such, the MMO feels that the recommendation made by the Examining Authority is consistent with the SoS decision.</p>	
<p>2.3 Article 38 – Requirements, appeals, etc.</p> <p>The MMO welcomes the recommendation to remove the proposed appeals process as included in the Applicant's draft DCO submitted at Deadline 6. As</p>	<p>The Applicant repeats its submissions above.</p>

Interested Party Written Representation	Applicant's Response
<p>highlighted in the MMOs deadline 6 response, it is still unclear to the MMO why there is the requirement for the inclusion of this appeals process. For the MMOs detailed response to the proposed appeals process, please refer to our deadline 6 response [REP6-072].</p>	
<p>2.4 Deemed Marine Licenses, Paragraph 10</p> <p>The MMO welcomes the recommendation to remove condition 10 from schedule 11 and Schedule 12. For the MMOs detailed position on arbitration and condition 10, please refer to the MMOs deadline 3 [REP3-092] and deadline 5 response [REP5 – 029].</p>	<p>The Applicant repeats its submissions above.</p>
<p>2.5 Deemed Marine Licenses, Condition 14 (2)</p> <p>The MMO welcomes the changes that have been made here. However, would like to highlight that not only the Development Principles are vital to navigational safety, but there are other concerns such as environmental considerations (e.g. condition 13 (1) (a) (v)) that are required to be considered to ensure that the project lies within the scope of the Environmental Statement (ES). For example this condition contains requirements for micro-siting. The MMO would recommend for the wording to be amended to reflect this.</p>	<p>The Applicant has amended the draft DCO in line with the ExA's schedule of changes</p>
<p>2.6 Deemed Marine Licenses, Condition 14 (4)</p> <p>The MMO welcomes the recommendation for the removal of this sub-condition. For further information on the MMOs position on arbitration, please see paragraphs 2.2-2.4.</p>	<p>The Applicant repeats its submissions above.</p>
<p>2.7 Deemed Marine Licenses, Condition 14 (1)</p> <p>The MMO would like to express our disappointment that there was no recommendation to amend the pre-construction submission timescales, from 4 to</p>	<p>The Applicant has commented on the topic of timescales earlier in this response.</p>

Interested Party Written Representation	Applicant's Response
<p>6 month as recommended by the MMO in our deadline 3 response. For more detail on the MMOs position on timescales, please refer to our deadline 3 and deadline 5 response [REP3 – 092] and [REP5 – 029].</p>	
<p>2.8 Deemed Marine Licenses, Condition 18 (3) and (4)</p> <p>The MMO welcomes the recommendation to include the condition wording for the monitoring of the first four piles as proposed by the MMO and Natural England. Please refer to the MMOs deadline 5 response for the detailed reasoning behind this request [REP5 – 029].</p>	<p>With regard to the monitoring of underwater noise, the Applicant wishes to make explicitly clear that it does not support, under any circumstance, the inclusion of the tailpiece in the MMO's proposed condition that would effectively see the developer take on self enforcement activity.</p> <p>The Applicant notes that without prejudice text was included within its draft DCO submitted by the Applicant at Deadline 6. This was done purely so that if the ExA and or SoS was minded to include it within the DCO that supports their respective recommendation / decision then it was clear where it should be located. However, the Applicant reflects that in doing this it may have falsely created the impression that it would somehow not object to its inclusion. That is categorically not the case.</p> <p>For the reasons set out by the Applicant in the first DCO hearing (ISH3, see Applicant's written summary [REP3-005]), the Applicant makes clear that it has committed to the relevant monitoring and reporting proposed by the MMO already at Condition 18 (2(a) and (3)). That component of the MMO's proposed wording is therefore, agreed and already included. It considers the enforcement tail-piece an unnecessary addition to the DCO as the MMO have those enforcement powers within the MCAA (Section 72 and 102).</p>
<p>2.9 Schedule 13 – Arbitration Rules (6)</p> <p>Without prejudice to the MMOs position, the MMO supports the suggested changes recommended by the Examining Authority. For the MMOs detailed comments on Schedule 13 please refer to our deadline 6 response [Rep6 – 072].</p>	<p>The Applicant has made amendments to the draft DCO to incorporate the reasonableness provisions in (3).</p> <p>Regarding (1) and (2), it is the normal position for appeal procedures for parties to bear their own costs, save where conduct of a party has been unreasonable, in such case costs are often awarded against that party. The</p>

Interested Party Written Representation	Applicant's Response
	Applicant sees no good reason to take a different approach here. Also, there may well be circumstances where a party other than the undertaker would wish to commence arbitration.

Representations relating to Cawston (from residents/businesses) (REP7-106 to REP7-121)

Summary

The Applicant has engaged with Cawston Parish Council, and many residents and business owners, in the development of the proposed traffic intervention scheme for Cawston.

Many of the concerns raised in the Deadline 7 submissions by the local residents and business owners in Cawston have been raised to the Applicant previously, and are responded to, or addressed in Appendix 26 – Construction Traffic Noise and Vibration Assessment for Cawston Village and Appendix 27 – Development of the Cawston Traffic Intervention Scheme submitted at Deadline 7 (REP7-046 and REP7-047). These include:

- Potential for increased noise pollution;
- Potential for vibration impacts on properties and features adjacent to the road, including Listed Buildings;
- Concerns regarding the suitability of bridges within, or on the outskirts of Cawston;
- Interaction of the proposals on bus movements and restrictions around school drop off/pick-up times;
- Potential for impacts on the safety for cyclists within Cawston;
- Potential for impacts on pedestrian amenity and safety within Cawston, including implications for footpaths;
- Potential for impacts on existing parking within the centre of the village (benefits and drawbacks or retention and or removal);
- Concerns regarding the suitability of the road for the proposed level of traffic movements;
- Potential for increased air pollution;
- Potential for existing, or proposed traffic to be pushed onto alternate routes around the village;
- Potential for impacts on local businesses; and

- Potential for congestion and driver delay through Cawston.

To avoid repetition, only where additional concerns have been raised by Interested Parties, or further progress has been made since the Deadline 7 submissions, has the Applicant provided a response below.

It is noted that since Deadline 7, we have reviewed the feedback received from Cawston residents and further consultation has been undertaken with NCC, resulting in minor refinements being made to the proposed outline traffic management scheme. Annex A to these responses provides the current outline proposals put forward by the Applicant, which have been agreed in principle with NCC and will be included within the Outline CTMP submitted at Deadline 9. This position will also be set out in the Statement of Common Ground between the Applicant and NCC submitted at Deadline 9. The outline schemes would be further developed as part of the detailed CTMP, to be prepared post-consent, and would be subject to further consultation with stakeholders, including Cawston Parish Council and Broadland District Council.

Response to REP7-106 – Helen and Chris Monk

Summary of Interested Party Written Representation (which have not already been considered within REP7-046 and REP7-047)	Applicant's Response
<p>Concerns over the practical ability to enforce a 20 mph limit.</p>	<p>During the Applicant's engagement with NCC on the proposed intervention measures, NCC requested that the existing parking was retained as this obstruction was a self-enforcing speed restrictor.</p> <p>The Applicant's revised scheme retains the existing parking provision on-street, albeit formalising the arrangement to avoid parking on the corner of junctions which currently occurs with the informal arrangement.</p>
<p>Reservations about the practicality for articulated vehicles turning in and out of Chapel Street.</p>	<p>The Applicant has explored alternate HGV routing with NCC, which would result in vehicles entering Cawston along B1145, travelling through Cawston to the onshore cable corridor, but on the return journey, vehicles would turn north in the centre of the village, utilising Chapel Lane to avoid the narrow carriageway immediately to the west of the delicatessen in the centre of the village. However, NCC has confirmed that this route, along with other alternatives such as Crabgate Lane (South) and Southgate Lane (Heydon Rd on some mapping) are not feasible alternatives to the use of the B1145 through Cawston.</p> <p>The Applicant would note that the re position of the central parking area and the alternations to the carriageway space, as proposed within the Applicant's current proposals (Annex A to these responses), improves driver visibility. This, in combination with the 20 mph limit, would facilitate a more managed movement through this junction.</p>
<p>The Applicant promises to programme their own vehicle movements to avoid clashes in sensitive spots but even if they manage that 100%, which we doubt, they cannot control other traffic, so there will undoubtedly be many such clashes.</p>	<p>It will not be possible to programme traffic to avoid two vehicles (either project related, or otherwise) meeting at specific pinch points along the local road network due to the fluid nature of the road network.</p>

Summary of Interested Party Written Representation (which have not already been considered within REP7-046 and REP7-047)	Applicant's Response
	<p>However, at the specific pinch point in Cawston (adjacent to the old School area), the footway would be increased and a priority working arrangement put in place to ensure driver to driver sightlines are improved. At other locations, the Applicant acknowledges pinch points exist within Cawston where the ability of two HGVs to manoeuvre would be reliant upon driver awareness (i.e. reduction in speed and use of the full carriageway), as such the Applicant has proposed driver awareness signage and improvements comprising the introduction of a 20mph speed limit, gateway features, VAS signs and footway enhancements. These measures are incorporated into the Applicant's final outline proposals provided as Annex A to these responses.</p>
<p>Appendix 25 has summaries of daily traffic in Tables 2.1 (normal distribution) and 2.2 (sensitivity distribution). If you discount link 208 (The Street, Oulton), which is recognised as a special case, then Cawston has, by far, the lowest base traffic numbers and, again by far, the highest percentage increases in HGV traffic (289% / 389%).</p> <p>No reasonable judgement could dismiss this as being "not significant"</p>	<p>In Appendix 28 to the Deadline 7 submission (REP7-048), the Applicant provided a cumulative assessment (which assumes an overlap of Hornsea Three and Norfolk Vanguard, with no mitigation) for the links through Cawston. This is considered to represent a maximum (worst case) scenario which would result in the maximum number of vehicle movements through Cawston.</p> <p>This assessment concluded that there was potential for minor adverse effects within Cawston without mitigation, although this is not significant in EIA terms.</p> <p>The Applicant is committed to providing an intervention scheme within Cawston to minimise effects further, and the Applicant's final outline proposals provided as Annex A to these responses.</p>
<p>We suggest that there has been insufficient consideration of alternatives which would take traffic away from Cawston centre, such as the re-siting of the</p>	<p>The Applicant has discussed various alternatives with NCC as the local highway authority. This has included the potential to use Crabgate Lane</p>

Summary of Interested Party Written Representation (which have not already been considered within REP7-046 and REP7-047)	Applicant's Response
<p>compounds, the use of a network of minor roads - with a bit of development and an imaginative traffic circulation plan - and greater use of the haul road itself.</p>	<p>(South), Southgate Lane (Heydon Rd on some mapping) and Chapel Street. These discussions have indicated that there is no feasible alternative to the use of the B1145 through Cawston, which the Applicant notes, is designated as an HGV route, suitable for vehicles up to 44 tonnes. Further details on the alternatives analysis which has been undertaken will be provided in the Applicant's response to the ExA's Rule 17 directed to the Applicant issued on 19th March 2019, to be submitted at Deadline 9.</p> <p>In regard to the potential to build and utilise a joint haul road for Norfolk Vanguard and Hornsea Three, the Applicant would refer to its response to the detailed representation regarding this matter made by Cawston Parish Council at Deadline 7 (REP7-091).</p>

Response to REP7-107 and REP7-108 – V.I. Purdy

Summary of Interested Party Written Representation (which have not already been considered within REP7-046 and REP7-047).	Applicant's Response
<p>Human Rights Act Article 1 of the first protocol; Protection of property gives the right to every person peaceful enjoyment of their possessions. This imposes an obligation on the state not to interfere with the peaceful enjoyment of property etc.</p>	<p>The proposed traffic management measures have been developed based on feedback from stakeholders, including local residents, with due consideration to safety and accessibility, as well as to potential impacts on amenity. Particular consideration has been given to locations where there are sensitive receptors within Cawston (such as at the Primary School).</p> <p>Taking into consideration the traffic management measures as proposed by the Applicant (Annex A to these responses), it has been assessed that there would be no significant effects in respect to traffic and transport, noise and vibration, or air quality within Cawston.</p> <p>The Applicant refers to paragraph 7.8 of the Statement of Reasons (REP4-009) which sets out further details on human rights and the wider public benefits of Hornsea Three.</p>
<p>I should also point out at the junction of the A1067 and B1145 at Bawdeswell there is a road sign that states the road is "Unsuitable for long vehicles" this sign can be viewed on Google Earth</p>	<p>The Applicant is aware that the B1145 / A1067 junction at Bawdeswell has a sign stating 'unsuitable for long vehicles'. This section of the B1145, from Bawdeswell through Reepham, is not used to access the onshore cable corridor. The defined road corridor to access cable sections 9 and 10 is set out in Table 1.5 of the Environmental Statement: Volume 6, Annex 7.1 – Transport Assessment (APP-159).</p>

Response to REP7-109 – Mr Stephen and Mrs Clare Brown

Summary of Interested Party Written Representation (which have not already been considered within REP7-046 and REP7-047).	Applicant's Response
<p>When will you have the courage to actually schedule an open meeting here in the village at a time that allows residents to see the public face of the corporate beast that wishes to wreak such havoc on our homes?</p>	<p>The Applicant refers to the Consultation Report which sets out the public consultation that was undertaken prior to the submission of the Application (APP-034).</p> <p>To mitigate and manage the potential impacts on the local road network, Ørsted with its traffic and transport consultants – Create Consulting Engineers Ltd, has set out to develop a series of site specific traffic management measures. This work has been, and continues to be, informed by consultation with local stakeholders, including Cawston Parish Council, as well as Norfolk County Council (as the Highways Authority).</p> <p>In this regard, the Applicant undertook a site-walkover in Cawston (Tuesday 12 March 2019) to discuss Option 1, Revision 3 with relevant stakeholders, and gather feedback to inform its ongoing development. Representatives from Broadland District Council, Norfolk County Council and Cawston Parish Council were in attendance at the site walkover, as well as residents and business owners from Cawston. A summary of the feedback received, and the Applicant's response, is provided in Appendix 27 submitted at Deadline 7 (REP7-047). Where relevant, this has informed the development of the Applicant's final outline proposals provided as Annex A to these responses.</p>
<p>The effect on property prices. If anybody was thinking of putting their house on the market, there is no doubt that this traffic would have an effect on any achievable sale price. In fact homes in and around the route would become virtually unsaleable. Who in their right mind would purchase a home that is more akin to living on the London South Circular than a pleasant village through road?</p>	<p>The Applicant maintains that the B1145 is a route identified as suitable for HGV movements, and that with the mitigation measures proposed, no significant effects are predicted (in respect to noise and vibration, air quality or traffic and transport). Furthermore, the impact from Hornsea Three will be temporary, with a maximum duration of 30 months.</p>

Summary of Interested Party Written Representation (which have not already been considered within REP7-046 and REP7-047).	Applicant's Response
<p>There are other roads where there are no buildings that lead you to your site. With a bit of work and clever thinking they could be utilised, preventing this.</p>	<p>The Applicant has discussed various alternatives with NCC as the local highway authority. This has included the potential to use Crabgate Lane (South), Southgate Lane (Heydon Rd on some mapping) and Chapel Street. These discussions have indicated that there is no feasible alternative to the use of the B1145 through Cawston, which the Applicant notes, is designated as an HGV route, suitable for vehicles up to 44 tonnes. Further details on the alternatives analysis which has been undertaken will be provided in the Applicant's response to the ExA's Rule 17 directed to the Applicant issued on 19th March 2019, to be submitted at Deadline 9.</p>

Response to REP7-110 – Elliot and Amanda Marks

Summary of Interested Party Written Representation (which have not already been considered within REP7-046 and REP7-047).	Applicant's Response
<p>We are also concerned about the effect on our deliveries and how stock will reach us. At present we have around 20 deliveries a week ranging from vans to lorries.</p>	<p>The Applicant undertook baseline surveys along the B1145 and therefore has a good understanding of the existing traffic movements in the area. The Applicant has developed the proposed traffic management scheme with this existing usage in mind, such that with the mitigation measures proposed, no significant effects are predicted on the local road network. As such, there would be no significant effect on the deliveries to the local businesses, or indeed local residents in the area.</p>

Response to REP7-111 Kate Wyatt

Summary of Interested Party Written Representation (which have not already been considered within REP7-046 and REP7-047)	Applicant's Response
<p>From the Orsted drivers point of view- it seems that choosing to send HGV s through a small village with significant choke points and tight bends will be very tiring and frustrating for the drivers. school buses regularly use the route to and from Reepham as well as farm traffic which will increase the level of difficulty they face in each journey. I feel this may contribute to driver fatigue and therefore increase risk.</p>	<p>Health and safety for contractors, as well as the local community, is of the utmost importance to the Applicant. Specific health and safety provisions will be included within all contractors' contracts, including those which include HGV drivers. These provisions would cover, for example, measures to avoid driver fatigue.</p> <p>Furthermore, as set out in paragraph 2.1.2.2 of the Outline CTMP (REP7-045), all contractors will be required to comply with agreed routeing plans and will ensure that all drivers are informed of the need to restrict HGV movements to those specified routes. Proposals within Cawston in particular, include for driver awareness signage to highlight priority traffic for exit from the Village centre and signage to warn drivers of vehicles in the centre of the road. The specific details and locations of such measures will be agreed with NCC as part of the detailed CTMP.</p> <p>The Applicant has also committed to including a road network constraints plan within the Outline CTMP (to be submitted at Deadline 9), which highlights areas of particular sensitivity to contractors.</p>
<p>Lastly ,why do the lorries need to come through the village at all? I think the reputation of Orsted as a company genuinely trying to mitigate the effect of this nationally important project can be enhanced by finding an alternative route. For example, using a one way system routing lorries via Bluestone to Dog Corner and then Heydon Road back to B1145 beyond the railway bridge over Marriotts Way. If this could be temporarily widened, it would remove all the objections to the volume of traffic through the village.</p>	<p>The Applicant has discussed various alternatives with NCC as the local highway authority. This has included the potential to use Crabgate Lane (South), Southgate Lane (Heydon Rd on some mapping) and Chapel Street. These discussions have indicated that there is no feasible alternative to the use of the B1145 through Cawston, which the Applicant notes, is designated as an HGV route, suitable for vehicles up to 44 tonnes. Further details on the alternatives analysis which has been undertaken will be provided in the Applicant's response to the ExA's Rule 17 directed to the Applicant issued</p>

Summary of Interested Party Written Representation (which have not already been considered within REP7-046 and REP7-047)	Applicant's Response
	<p>on 19th March 2019, to be submitted at Deadline 9.</p> <p>In regard to the potential to build and utilise a joint haul road for Norfolk Vanguard and Hornsea Three, the Applicant would refer to its response to the detailed representation regarding this matter made by Cawston Parish Council at Deadline 7 (REP7-091).</p>

Response to REP7-112 – Peter Crossley

Summary of Interested Party Written Representation (which have not already been considered within REP7-046 and REP7-047).	Applicant's Response
Suggestion for the use of an offshore ring main approach.	<p>The Applicant notes the representation and would refer to the following documents which address matters relating to the grid connection point for Hornsea Project Three and consideration of alternatives:</p> <ul style="list-style-type: none"> • Volume 1, Chapter 4, Site Selection and Alternatives, of the Environmental Statement (APP-059); • Applicants Comments on Relevant Representations submitted at Deadline 1 (REP1-131) – response to RR-019; • National Grid's response to the ExA's written questions submitted at Deadline 1 (REP1-070); and • Applicant's comments on responses to the ExA's written questions submitted by Interested Parties at Deadline 1, submitted at Deadline 2 (REP2-005) – responses to Q1.1.11 and Q1.1.12.
Projects use the route for the cables to deliver its requirements via a temporary road.	The Applicant would refer to its response submitted for Deadline 9 to the detailed representation regarding this matter made by Cawston Parish Council at Deadline 7 (REP7-091).
Costs of solutions to be picked up by the project rather than indirectly through local council taxes.	The costs of any proposed traffic intervention measures will be borne by Hornsea Three. The works to implement such measures would either be delivered by the Applicant or the local highways authority.

Response to REP7-113 – Polly Brockis

Summary of Interested Party Written Representation (which have not already been considered within REP7-046 and REP7-047).	Applicant's Response
Concerns around the blind curve where High Street/Aylsham Road meet where drivers will not be able to see the road of traffic ahead.	The Applicant has agreed to introduce driver awareness signage to highlight priority traffic for exit from the Village centre and signage to warn drivers of vehicles in the centre of the road. The Applicant considers that these mitigation measures are sufficient to address the concerns raised and that traffic will be able to safely travel through Cawston. These measures are incorporated into the Applicant's final outline proposals, provided as Annex A to these responses The specific details and locations of such measures will be agreed with NCC as part of the detailed CTMP.
Outside the Old Forge, it appears long vehicles will have to drive into the side road to take the bend. Is this safe? How will that work for residents trying to exit their road?	
Large sections of the B1145 through Cawston are without street lighting. Heavy construction traffic will be passing pedestrians in near darkness.	The Applicant has taken the baseline conditions into consideration in the development of the outline traffic management scheme, including the lack of street lighting. The Applicant has agreed to introduce driver awareness signage and improvements comprising the introduction of a 20mph speed limit, gateway features, VAS signs and footway enhancements. These measures are incorporated into the Applicant's final outline proposals, provided as Annex A to these responses The specific details and locations of such measures will be agreed with NCC as part of the detailed CTMP. Such measures would represent an improvement to the existing environment and therefore there would likely have a positive effect on safety travelling through Cawston.
Request to see results from the noise and vibration monitoring and request for such monitoring to continue if project goes ahead.	The Applicant has submitted the noise and vibration report at Deadline 7 (Appendix 26, REP7-046), as well as shared the report directly with those residents who hosted the monitoring equipment.
Request for consideration of all viable alternatives to avoid HGVs travelling	The Applicant has discussed various alternatives with NCC as the local

Summary of Interested Party Written Representation (which have not already been considered within REP7-046 and REP7-047).	Applicant's Response
through Cawston	highway authority. This has included the potential to use Crabgate Lane (South), Southgate Lane (Heydon Rd on some mapping) and Chapel Street. These discussions have indicated that there is no feasible alternative to the use of the B1145 through Cawston to access cable sections 9 and 10. The Applicant notes that the B1145 through Cawston is designated as an HGV route, suitable for vehicles up to 44 tonnes. Further details on the alternatives analysis which has been undertaken will be provided in the Applicant's response to the ExA's Rule 17 directed to the Applicant issued on 19 th March 2019, to be submitted at Deadline 9.

Response to REP7-114 – Nicola Banham

Summary of Interested Party Written Representation (which have not already been considered within REP7-046 and REP7-047).	Applicant's Response
<p>I run a small bed and breakfast business from my property. Guests love the peace and quiet of this small Norfolk village. Both bedrooms directly overlook the high street and the noise and vibrations from the proposed traffic would destroy my B&B</p>	<p>The traffic management measures that are proposed, have been developed based on feedback from stakeholders, including local residents, with due consideration to safety and accessibility, as well as to potential impacts on amenity.</p> <p>Taking into consideration the proposed traffic management measures as proposed by the Applicant (Annex A to these responses) it has been assessed that there would be no significant effects in respect to traffic and transport, noise and vibration, or air quality within Cawston. As such, no significant effects on local businesses are predicted.</p>
<p>Believe the proposals are the cheapest option, but not the only option.</p>	<p>The Applicant has discussed various alternatives with NCC as the local highway authority. This has included the potential to use Crabgate Lane (South), Southgate Lane (Heydon Rd on some mapping) and Chapel Street. These discussions have indicated that there is no feasible alternative to the use of the B1145 through Cawston, which the Applicant notes, is designated as an HGV route, suitable for vehicles up to 44 tonnes. Further details on the alternatives analysis which has been undertaken will be provided in the Applicant's response to the ExA's Rule 17 directed to the Applicant issued on 19th March 2019, to be submitted at Deadline 9.</p> <p>In regard to the potential to build and utilise a joint haul road for Norfolk Vanguard and Hornsea Three, the Applicant would refer to its response submitted at Deadline 9 to the detailed representation regarding this matter made by Cawston Parish Council at Deadline 7 (REP7-091).</p>

Response to REP7-115 Andy and Clare Parle

Summary of Interested Party Written Representation (which have not already been considered within REP7-046 and REP7-047)	Applicant's Response
<p>I would rather Cawston was removed from the proposed traffic route but realise this is unrealistic. However, I feel very strongly that a one way system should be implemented using the Heydon Rd which joins the B1145 just after the Marriots Way Bridge (avoiding another pinch point and blind corner). This would involve creating passing places along the road towards Heydon, but the road is long and straight. Drivers can see traffic approaching at distance and would be able to anticipate pulling in. It would halve the proposed traffic flow through the centre of the village reducing noise, damage and disruption. When I visited the meeting In Reepham Church last year, planners said they would consider this option.</p> <p>Broadland Winery has a lot of deliveries in HGV vehicles. They use a one way system in and out of the village. They enter via the B1145 , turn right onto Chapel St and in leaving the winery they turn right to leave the village eventually joining the B1149. I don't think it's unreasonable for wind farm traffic to also consider a one way system as mentioned in my previous point.</p>	<p>The Applicant has discussed various alternatives with NCC as the local highway authority. This has included the potential to use Crabgate Lane (South) and Southgate Lane (Heydon Rd on some mapping). These discussions have indicated that there is no feasible alternative to the use of the B1145 through Cawston, which the Applicant notes, is designated as an HGV route, suitable for vehicles up to 44 tonnes.</p> <p>The Applicant has explored the alternate along Chapel Street with NCC, which would result in vehicles entering Cawston along B1145, travelling through Cawston to the onshore cable corridor, but on the return journey, vehicles would turn north in the centre of the village, utilising Chapel Lane to avoid the narrow carriageway immediately to the west of the delicatessen in the centre of the village. However, NCC has confirmed that this route, along with other alternatives are not feasible alternatives to the use of the B1145 through Cawston. Further details on the alternatives analysis which has been undertaken will be provided in the Applicant's response to the ExA's Rule 17 directed to the Applicant issued on 19th March 2019, to be submitted at Deadline 9.</p>
<p>Pub customers – the car park is on the opposite side of the road. They do a healthy lunch time trade. Should a pelican crossing be considered? This would also assist pedestrians for the Deli and school children for both the Primary school and High School buses.</p>	<p>As part of the propose intervention scheme, the Applicant has agreed to introduce improvements within Cawston comprising the introduction of a 20mph speed limit, gateway features, VAS signs and footway enhancements. The principles of this are all incorporated into the Applicant's final outline proposals, provided as Annex A to these responses</p> <p>As such measures would represent an improvement to the existing environment, the Applicant does not consider it necessary or appropriate to</p>

Summary of Interested Party Written Representation (which have not already been considered within REP7-046 and REP7-047)	Applicant's Response
	provide a pedestrian crossing within the village.
Does the applicant have a plan B in mind? For example if road needed to be closed for repairs etc?	Should an unforeseen event require the closure of the B1145, the Applicant would engage with the local highway authority and adjust its construction programme accordingly. For example, work fronts programmed to work on cable sections 9 and 10 would be deployed elsewhere whilst the repairs to the B1145 are completed.

Response to REP7-118 John Bentley (Broadland Wineries)

Summary of Interested Party Written Representation (which have not already been considered within REP7-046 and REP7-047)	Applicant's Response
Concerns regarding potential traffic disruption for our staff and delivery vehicles to our manufacturing site in Cawston.	The Applicant undertook baseline surveys along the B1145 and therefore has a good understanding of the existing traffic movements in the area. The Applicant has developed the proposed traffic management scheme with this existing usage in mind, such that with the mitigation measures proposed, no significant effects are predicted on the local road network. As such, there would be no significant effect on the deliveries to the local businesses.

Response to REP7-121 – Nicola Stokes

Summary of Interested Party Written Representation (which have not already been considered within REP7-046 and REP7-047).	Applicant's Response
<p>The addition of more HGV traffic will worsen the problem [<i>traffic having to pass in single file at some points</i>] and increase the risk of road traffic collisions.</p>	<p>The Applicant refers to Appendix 28 of the Applicant's submission at Deadline 7 (REP-048) which assesses the impact of construction traffic on accidents and road safety at Cawston. The effect has been assessed to be of minor adverse significance which is not significant in EIA terms. Furthermore, the Applicant has proposed within the outline scheme a reduction from 30 mph to 20 mph within the village centre to improve safety and pedestrian amenity. The Applicant's final outline proposals are provided as Annex A to these responses.</p>

Response to REP7-116 – Heidi Hobday, REP7-117 Frances L. Rossington, REP7-119 – Mike Linley, REP7-120 Claire Gray

Summary of Interested Party Written Representation (which have not already been considered within REP7-046 and REP7-047)	Applicant's Response
<p>These representations raised similar points to those listed in REP7-047, or in the representations summarised above. The concerns can be summarised as follows:</p> <ul style="list-style-type: none"> • Ability of the road network to support proposed levels of traffic, including risk of subsidence and potential for congestion; • Impacts on the primary school; • Impacts including pollution, noise and vibration; • Impacts on the functioning of the bus stops and school buses; • Impacts on the integrity and structure of existing buildings, including Listed Buildings; • Impact of restricted parking; • Risk of increased traffic collisions; • Impacts on the bridges; • Pedestrian safety; • Impacts on amenity and implications of the Human Rights Act 	<p>The Applicant would refer to the responses provided in Appendix 27 submitted at Deadline 7 (REP7-047), as well as the responses provided above.</p>