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**To:** [KJ Johansson](#); [Hornsea Project Three](#); [Hornsea Project Three](#)  
**Cc:** [Andrew Guyton](#); [Stuart Livesey](#)  
**Subject:** Hornsea Project Three (UK) Ltd Additional Response to Deadline 9  
**Date:** 27 March 2019 17:43:12  
**Attachments:** [image001.png](#)  
[HOW03\\_SoCG\\_BDC\\_March 2019.pdf](#)

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Dear K-J,

Following the Applicants submission to Deadline 9 made yesterday (26<sup>th</sup> March), please find attached a Statement of Common Ground between the Applicant and Broadland District Council.

It wasn't possible to obtain the SoCG signed in time for DL9, but this is the earliest possible opportunity following that.

Please can you confirm if this will be accepted, by discretion of the ExA, under the Deadline 9 submission.

Thank you,

Dominika

Best regards,  
**Dr Dominika Chalder PIEMA**  
Environment and Consent Manager



Environmental Management UK; Wind Power  
5 Howick Place | London | SW1P 1WG



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Hornsea Project Three  
Offshore Wind Farm



## Hornsea Project Three Offshore Wind Farm

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

Date: March 2019

Hornsea 3  
Offshore Wind Farm

Orsted

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

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Ørsted

5 Howick Place,

London, SW1P 1WG

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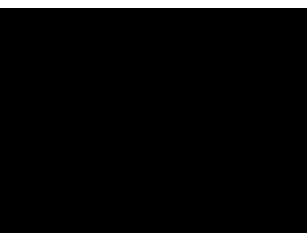
Front cover picture: Kite surfer near a UK offshore wind farm © Ørsted Hornsea Project Three (UK) Ltd., 2019.

## Revision History

Version	Date	Author	Context
1	August 2018	Ørsted	Pre-examination: Initial draft for discussion with Broadland District Council
2	October 2018	Ørsted	Second draft for discussion with Broadland District Council
3	October 2018	Ørsted	Third draft following meeting on 31.10.2018.
4	November 2018	Ørsted	Fourth draft following inputs from Broadland District Council.
5	November 2018	Ørsted	Final draft for signing
6	January 2019	Ørsted	First draft for discussion with Broadland District Council for submission at Deadline 4
7	January 2019	Ørsted and Broadland District Council	Second Draft updated with Broadland District Council inputs
8	January 2019	Ørsted	Final draft for signing
9	January 2019	Ørsted	Final for submission at Deadline 4
10	February 2019	Ørsted	Draft for discussion with Broadland District Council
11	March 2019	Ørsted	Final draft for signing and submission at Deadline 7
12	March 2019	Ørsted	Draft for discussion with Broadland District Council for submission at Deadline 9

**Signatories**

<i>Signed</i>	<b>Matthew Rooke</b>
<b>Name</b>	Matthew Rooke
<b>Position</b>	Hornsea Project Three Case Officer
<b>For</b>	Broadland District Council

<i>Signed</i>	
<b>Name</b>	Andrew Guyton
<b>Position</b>	Hornsea Project Three Consents Manager
<b>For</b>	Ørsted Hornsea Project Three (UK) Ltd

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## Acronyms

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

## 1. Introduction

### Overview

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

### Approach to SoCG

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

### Hornsea Three

- 1.5 Hornsea Three is a proposed offshore wind farm located in the southern North Sea and will include all associated offshore (including up to 300 turbines) and onshore infrastructure.
- 1.6 The key components of Hornsea Three include:
- Turbines and associated foundations;
  - Turbine foundations;
  - Array cables;
  - Offshore substation(s), and platform(s) and associated foundations;
  - Offshore accommodation platform/s and associated foundations;
  - Offshore export cable/s;
  - Offshore and/or onshore HVAC booster station/s (AC transmission option only);
  - Onshore cables (including the Hornsea Three landfall area); and
  - Onshore HVDC converter/HVAC substation.
- 1.7 The Hornsea Three array area (i.e. the area in which the turbines are located) is approximately 696 km<sup>2</sup> and is located approximately 121 km northeast off the Norfolk coast and 160 km east of the Yorkshire coast.



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

## 2. Consultation

### **Application elements within Broadland District Council’s administrative area**

- 2.1 Work Nos. 8 and 13 to 15 detailed in Part 1 of Schedule 1 of the draft DCO (APP-027) describe the elements of Hornsea Three which may affect the interests of Broadland District Council (BDC).
- 2.2 Based on a review of the relevant representation submitted by Broadland District Council, those technical topics of the DCO application of relevance to Broadland District Council (and therefore considered within this SoCG) comprise:
- Landscape and Visual Resources;
  - Historic Environment (Onshore above ground; below ground is deferred to Norfolk County Council);
  - Noise and Vibration;
  - Air Quality;
  - Socio-economics.
- 2.3 BDC confirmed that matters related to ecology and nature conservation, and traffic and transport would be deferred to Norfolk County Council, with the exception of the following points raised in BDC’s relevant representation:
- Traffic and Transport matters related directly to the Main Construction Compound at Oulton; and
  - Ecology matters related to Important Hedgerows and areas of woodland.
- 2.4 In addition to the technical topics above, a general section is included below where those issue which general to the project are discussed.

### **Consultation summary**

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

#### **Pre-application**

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

#### **Post-application**

- 2.8 ~~Table 2.2~~ [Table 2.2](#) summarises the consultation undertaken between the parties during the post-application phase.

Table 2.1: Pre-application consultation with Broadland District Council.

Date	Detail
24 March 2016	Introduction to Hornsea Project Three
21 July 2016	Project Update
01 February 2017	Project Update and meeting with technical leads
07 June 2017	Project Update including planning process and scope of the PEIR
08 November 2017	Project Update including programme, review of S42 responses and onshore route refinements.

Table 2.2: Post application consultation with Broadland District Council.

Date	Detail
October 2018	Various emails regarding traffic and transport matters, including issue of the Main Construction Compound Access Strategy.
31 October 2018	Project Update, including examination programme and Statement of Common Ground
07 December 2018	Informal discussions at Hornsea Three ISH4
11 January 2019	Meeting between the Applicant and all Local Planning Authorities, as well as Norfolk County Council to discuss the DCO
27 February 2019	Meeting between the Applicant and Broadland District Council to discuss outstanding matters
March 2019	Various emails and telephone conversations regarding traffic and transport matters, and construction traffic noise and vibration.

### 3. Agreements Log

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

#### **General**

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

Table 3.1: General Issues.

Discussion Point	The Applicant's Position	Broadland District Council's Position	Final Position
Need for renewable energy	There is a specific need to provide renewable energy, which is in line with government policy.	BDC notes that the proposed development will deliver a significant national benefit in the supply of substantial renewable energy in the UK.	<b>Agreed</b>
Adequacy of consultation	Proper pre-submission consultation activities were undertaken by the Applicant, including engagement with Broadland District Council and the local community.	BDC have been consulted through the process and have no specific points to raise.	<b>Agreed</b>
Site Selection and Route Refinement	The site selection and route refinement outlined in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (APP-059) has properly considered the alternatives for the relevant elements of Hornsea Three (paragraph 2.1).	BDC are satisfied that a route refinement process has been undertaken to identify an appropriate onshore cable corridor route. BDC have no other specific comments in respect to site selection or alternatives.	<b>Agreed</b>
Transmission System	Inclusion of both HVAC and HVDC transmission systems within the envelope is appropriate to ensure that anticipated changes in available technology and project economics can be accommodated within the Hornsea Three design, and a decision on which transmission type to use will be made during the detailed design phase (post consent).	BDC note that a HVDC transmission system results in a reduced width cable corridor which is preferable to reduce visual and environmental impacts.	<b>Not agreed - Both parties positions are final on this matter.</b>

Discussion Point	The Applicant's Position	Broadland District Council's Position	Final Position
Community benefit	<p>The Applicant has established voluntary Community Benefit Funds (CBFs) for a number of previous projects, which are currently under construction. These funds can make a valuable contribution to the local area, by supporting projects such as community building improvements and recreation facilities, conservation and wildlife projects etc. The Applicant will review the interactions of Hornsea Three, as the proposal is refined, and consider an appropriate way to feed benefits back into the local community. However, any decision to establish a community benefit fund for Hornsea Three, and the mechanism and triggers for contributions to it, would be made post financial investment decision (FID).</p>	<p>BDC is supportive of Community Benefit Funds which have the potential to support local projects.</p>	<p><b>Agreed</b></p>

### **Ecology and Nature Conservation**

- 3.3 As noted in paragraph 2.3, all ecology matters are deferred to Norfolk County Council with the exception of Important Hedgerows and matters related to areas of woodland as it is considered these have an influence on other related matters e.g. Landscape and Visual.
- 3.4 Hornsea Three has the potential to impact upon hedgerows and areas of woodland, and these impacts are considered within Volume 3, Chapter 3: Ecology and Nature Conservation of the Environmental Statement (APP-075). An Outline Code of Construction Practice (CoCP, APP-179) and Outline Ecological Management Plan (EMP, APP-180) has been prepared that captures all relevant management and mitigation measures associated with this topic.
- 3.5 Table 3.2 identifies the status of discussions relating to this topic between the parties.

Table 3.2: Ecology and Nature Conservation.

Discussion Point	The Applicant's Position	Broadland District Council's Position	Final Position
<b>Volume 3, Chapter 3: Ecology and Nature Conservation of the Environmental Statement (APP-075)</b>			
Assessment Methodology and Assessment Conclusions	<p>The applicants use of designed in mitigations, notably the use of horizontal drilling, to avoid designated sites and the sensitive habitats is appropriate. No further mitigation, in addition to those embedded measures identified in Volume 3, Chapter 3: Ecology and Nature Conservation of the Environmental Statement, the Outline CoCP (APP-179) and the Outline EMP (APP-180) are necessary as a result of the assessment conclusions.</p>	<p>BDC are satisfied that a robust route refinement process has been undertaken to optimise the route in respect of avoiding hedgerows, designated sites and areas of woodland.</p> <p>Furthermore, BDC note the use of HDD to avoid many hedgerows and areas of woodland, including Important Hedgerows.</p>	<b>Agreed</b>
	<p>The assessment methodology in respect to impacts on hedgerows and trees currently assumes a maximum design scenario of removal in all areas where HDD is not proposed, or specific protective measures are not identified within the Outline EMP (APP-180) (i.e. as done for retained habitats of ecology and nature conservation concern, paragraph 4.2.2). This approach is appropriate and provides BDC with sufficient comfort that impacts on hedgerows and trees identified under the maximum design scenario have been considered and where appropriate, suitable mitigation is captured within the Outline CoCP (APP-179), Outline EMP (APP-180) and Outline LMP (APP-181). Buffer zones around retained hedgerows will be established where practicable to minimise impacts to hedgerow roots (paragraph 4.2.2.1 of the Outline CoCP).</p> <p>The Applicant's has provided BDC with a plan clarifying the classification of Important Hedgerows relevant to the Hedgerow Regulations 1997 (issued on 26.10.2018). Hornsea Three has minimised the removal of these Important Hedgerows through the use of HDD or HDD with a haul road over. Where a haul road is proposed, the exact location of the haul road within the Order Limits would optimised through agreement with a suitably qualified</p>	<p>BDC welcomes the use of HDD to avoid or minimise impacts on hedgerows, including Important Hedgerows, as well as the replanting following the completion of construction.</p> <p>Subject to the amendments noted, BDC are satisfied that sufficient principles are included within the Outline CoCP to protect hedgerows during the construction phase, including the provision of buffer zones where practicable.</p>	<b>Agreed</b>



Discussion Point	The Applicant's Position	Broadland District Council's Position	Final Position
	<p>ecologist. The Applicant has amended paragraph 6.5.1.13 of the Outline CoCP as follows to capture this commitment (new text shown in underline):</p> <p>6.5.1.14 – <u>“The length of individual hedgerow sections to be removed will be reduced as far as reasonably practicable. <i>In this regard, where an HDD with a haul road, or HDD with ducting laydown is proposed, the exact location of the haul road/ducting laydown within the Order Limits would be optimised through agreement with a suitably qualified ecologist to further minimise hedgerow and tree removal.</i>”</u></p> <p>All sections of hedgerow removed to enable construction of the onshore cable corridor will be replanted as soon as practicable after each phase of cable installation. Replacement planting will comprise a species-rich mix of native shallow-rooting hedgerow species typical of the area. This commitment is captured in the Outline EMP (paragraph 5.3.3.2, APP-180). This approach is appropriate.</p>		
	<p>The Applicant notes that the preferred access strategy to the main construction compound (Option 1: Passing Places) has been designed to avoid impacts on hedgerows and trees along The Street. This option has been agreed with NCC as the local highway authority.</p> <p>The Stage 1 Road Safety Audit (provided as part of Appendix 20 to the Applicant's response to Deadline 1) has indicated that hedgerows on the bend along The Street currently restricts levels of forward visibility (particularly northbound). As such, a short section of hedgerows opposite the entrance to Docking Farm (The Granary) would be trimmed back and then maintained to satisfy visibility requirements along The Street by improving for inter-visibility through the bend in The Street and visibility at the existing field access. The area which would require maintenance is provided in Appendix 32 of the Applicant's submission at Deadline 4 (REP4-053). Based on the design of Option 1: Passing Places which has been agreed with NCC, no removal of hedgerows or trees would be required.</p>	<p>BDC defer the approval of the access strategy to Norfolk County Council as Highways Authority, but are content with the measures put in place to protect hedgerows and trees along The Street.</p>	<p><b>Agreed</b></p>

Discussion Point	The Applicant's Position	Broadland District Council's Position	Final Position
	Impacts to the hedgerows and trees along The Street, would be minimised and managed through the principles set out in the Outline EMP (REP4-022), paragraph 5.3.2.4.		
	<p>In response to concerns raised by Oulton Parish Council (OPC), the Applicant has considered an alternate 'Option R' access strategy to the main construction compound (Options R 'A'; Option R 'C1'; Options R 'C2'). This option remains under consideration, in consultation with NCC, BDC and OPC, but is expected to require significant sections of hedgerow and potentially tree removal both along the B1149 and along the field boundaries.</p> <p>Given the availability of an existing road, the potential environmental impacts associated with Option 'R' and potential cumulative impacts, the Applicant considers that, although Option R may provide some benefits associated with redirecting Hornsea Three project traffic away from The Street, Option 1: Passing Places remains the preferred access option to the main construction compound.</p>	BDC defer the approval of the access strategy to Norfolk County Council as Highways Authority, but are content with the measures put in place to protect hedgerows and trees along The Street.	<b>Agreed</b>
<b><i>Draft Development Consent Order</i></b>			
Commitments / restrictions	The commitment to produce both an Ecological Management Plan (EMP) (Schedule 1, Part 3, Requirement 10 of the draft DCO) and a Code of Construction Practice (CoCP) (Requirement 17 of the draft DCO) that must be approved by relevant planning authority (including Broadland District Council) prior to the commencement of works are appropriate control measures for managing the potential effects on ecology and nature conservation landward of MHWS. The EMP and CoCP will include all relevant embedded measures cited within Volume 3, Chapter 3: Ecology and Nature Conservation of the Environmental Statement, as well as the Outline EMP (APP-180) and Outline CoCP (APP-179).	BDC welcome the opportunity to input and agree the detailed Ecological Management Plan and Code of Construction Practice post-consent.	<b>Agreed</b>

Discussion Point	The Applicant's Position	Broadland District Council's Position	Final Position
<b>Outline Management Plans</b>			
Ecological management	The management measures described to minimise impacts on ecology receptors in Outline CoCP (APP-179) and Outline EMP (APP-180) are appropriate, including the appointment of an Ecological Clerk of Works. The Applicant will consult with North Norfolk, Broadland and South Norfolk District Councils, as well as Norfolk County Council, on any development of the Ecological Management Plan.	BDC are satisfied that the measures contained within the Outline CoCP and Outline EMP are appropriate.	<b>Agreed</b>
Woodland buffer	The commitment within the Outline EMP to provide productive buffer zone surrounding retained areas of woodland (15 m in width or the width of the tree root protection zone, whichever is the greater, as advised by an appropriately qualified surveyor) is appropriate and provides sufficient protection to the areas of woodland (including Jennis Wood and Harman's Grove as identified in BDC's relevant representation RR-057) located directly adjacent to the onshore cable corridor.	BDC welcome the inclusion of a buffer distance to the areas of woodland identified.	<b>Agreed</b>

### **Landscape and Visual Resources**

- 3.6 Hornsea Three has the potential to impact upon landscape and visual resources, and these impacts are considered within Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement (APP-076). Table 3.3 identifies the status of discussions relating to this topic between the parties.

Table 3.3: Landscape and Visual Resources.

Discussion Point	The Applicant's Position	Broadland District Council's Position	Final Position
<b>Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement (APP-076)</b>			
Planning and Policy	Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement has identified all appropriate plans and policies relevant to landscape and visual resources in the application area and has given due regard to them within the assessments.	BDC has no specific concerns to raise in respect to planning and policy.	<b>Agreed</b>
Baseline Environment and Assessment Methodology	The baseline information utilised to inform the assessment and the methodology used to assess impacts on landscape and visual resources in Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement is appropriate.	BDC has no specific concerns to raise in respect to the baseline and assessment methodology, they are considered appropriate to inform the assessment.	<b>Agreed</b>
Assessment conclusions	<p>The assessment of potential effects on landscape and visual resources during the construction, operation and maintenance, and decommissioning of Hornsea Three in Section 4.11 of Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement is appropriate and accurate given the implementation of the measures adopted as part of Hornsea Three (outlined in Section 4.10 of Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement).</p> <p>Specific consideration is given to visual effects of the main construction compound in paragraph 4.7.6.5 and confirms that, given the nature of temporary buildings, equipment and materials stored at the main construction compound (which would not be fundamentally different from existing uses on the airfield site) as well as the extent of screening from existing vegetation, effects on</p>	<p>BDC note that all infrastructure within their jurisdiction, with the exception of the main construction compound is associated with the onshore cable corridor and as such impacts on landscape and visual receptors are temporary and during the construction period only. BDC have no specific concerns to raise in respect to the onshore cable corridor assessment.</p> <p>BDC note that further detail on the use and layout of the main construction compound, including fencing and lighting, would be provided at the detailed design stage and would be agreed with BDC through the final CoCP.</p>	<b>Agreed</b>

Discussion Point	The Applicant's Position	Broadland District Council's Position	Final Position
	<p>visual receptors resulting from the Hornsea Three main construction compound would not be significant. Furthermore, the implementation of a good housekeeping policy, and appropriate layout of features at the main construction compound is appropriate to contain and limit visual intrusion of the main construction compounds (paragraph 4.1.2 of the Outline CoCP).</p> <p>The principles of the use and set-up of the main construction compound, including fencing and lighting is set out in the Outline CoCP (paragraph 4.1.7.5). This identifies fencing to likely be "<i>bolted and anchored herras fencing or its equivalent</i>". To reflect the sensitivity of the main construction compound site to light impacts (due to the proximity to the designated Dark Sky Discovery Sites), the Applicant has made the following amendments to the Outline CoCP to strengthen the mitigation at this location (new text shown in underline):</p> <p>Paragraph 4.1.7.6: "<i>In establishing <u>and operating</u> the compound, the principal contractor will:</i></p> <ul style="list-style-type: none"> <li>• <i>Ensure any crossing points over existing local services will be installed in a manner agreed with the asset owner;</i></li> <li>• <i>Ensure surface runoff is managed appropriately;</i></li> <li>• <i>Ensure any temporary services necessary to support the main construction compound will be installed in a manner agreed with the landowner and service provider; and</i></li> <li>• <i>Co-ordinate activities with other users and tenants of the airfield to minimise wider disruption;</i></li> <li>• <i><u>Use lighting only during periods of poor visibility due to weather conditions or low light levels;</u></i></li> <li>• <i><u>Use low levels of security lighting where required, i.e. at the</u></i></li> </ul>		

Discussion Point	The Applicant's Position	Broadland District Council's Position	Final Position
	<p><u>perimeter of the site, at the entrance to the site and office facilities; and</u></p> <ul style="list-style-type: none"> <li><u>Use lighting fixtures which are no greater than 4 m in height to minimise light spill."</u></li> </ul> <p>The detailed lighting strategy, as well as the layout and fencing to be implemented at the main construction compound, will be agreed through the Code of Construction Practice (CoCP) for the approval of the local planning authority under DCO Requirement 17 Code of Construction Practice.</p>		
	<p>The Applicant's use of designed in mitigation, notably the use of HDD and landscape planting, to minimise impacts on landscape and visual resources is appropriate.</p> <p>No further mitigation to those embedded measures identified in Section 4.10 of Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement, the Outline CoCP (APP-179) and the Outline LMP (APP-181) are necessary as a result of the assessment conclusions.</p>	<p>BDC welcomes the use of HDD to avoid or minimise impacts on hedgerows, including Important Hedgerows, as well as the replanting following the completion of construction.</p> <p>As noted above, BDC note that further detail on the use and layout of the main construction compound, including fencing and lighting, would be provided at the detailed design stage and would be agreed with BDC through the final CoCP.</p>	<b>Agreed</b>
	<p>The assessment of potential cumulative effects in Section 4.13 of Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement is appropriate and accurate. Specific consideration has been given to the potential for cumulative effects between Hornsea Three and Norfolk Vanguard at the proposed crossing point, north of Reephams, in paragraphs 4.13.2.3 – 4.13.2.4 of Volume 3, Chapter 4: Landscape and Visual Resources. This concludes that the combined effects would be no greater than any of the projects on their own and therefore effects</p>	<p>BDC are satisfied that cumulative effects have been assessed and that there will be sufficient opportunity for site specific measures to be identified at the proposed crossing point (should the construction phase of the projects overlap) through the development of a final CoCP to be submitted and agreed with BDC. BDC are satisfied with the conclusions of the cumulative assessment.</p>	<b>Agreed</b>

Discussion Point	The Applicant's Position	Broadland District Council's Position	Final Position
	<p>were not assessed to be significant.</p> <p>Hornsea Three, Norfolk Vanguard, Norfolk Boreas have entered into a co-operation Agreement. Whilst the terms of that agreement are confidential – matters pertinent to minimising cumulative impacts of construction at the crossing location have been included. Where appropriate these will be incorporated into the final CoCP to be agreed with BDC post-consent (Requirement 17 of the dDCO)</p>		
<b>Draft Development Consent Order (APP-027)</b>			
Commitments / restrictions	<p>The commitment to produce a LMP (Requirement 8 of the draft DCO) in conjunction with an EMP (Requirement 10 of the draft DCO), and a CoCP (Requirement 17 of the draft DCO), that must be approved by relevant planning authority (including Broadland District Council) prior to the commencement of works are appropriate control measures for managing the potential effects landscape and visual resources. The LMP, EMP and CoCP will include all relevant embedded measures cited within Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement, as well as the Outline LMP (APP-181), Outline EMP (APP-180) and Outline CoCP (APP-179).</p>	<p>BDC will review and provide input into the preparation of the final LMP, EMP and CoCP as appropriate.</p>	<p><b>Agreed</b></p>
<b>Outline Management Plans</b>			
Landscaping management	<p>The management measures described to minimise impacts on landscape and visual resources in the Outline LMP (APP-181), Outline EMP (APP-180) and Outline CoCP (APP-179) are appropriate.</p>	<p>BDC are satisfied that sufficient principles are included within these outline documents and that these will be incorporated into the final documents post-consent.</p>	<p><b>Agreed</b></p>



### **Historic Environment**

- 3.7 Hornsea Three has the potential to impact upon the historic environment, and these impacts are considered within Volume 3, Chapter 5: Historic Environment of the Environmental Statement (APP-077). An Outline Code of Construction Practice (Outline CoCP, APP-179) has been prepared that captures all relevant management and mitigation measures associated with this topic.
- 3.8 Table 3.4 identifies the status of discussions relating to this topic in respect of the above ground historic environment between the parties.

Table 3.4: Historic Environment.

Discussion Point	The Applicant's Position	Broadland District Council's Position	Final Position
<b>Volume 3, Chapter 5: Historic Environment of the Environmental Statement (APP-077)</b>			
Planning and Policy	Volume 3, Chapter 5: Historic Environment of the Environmental Statement has identified all appropriate plans and policies relevant to the historic environment in the application area and has given due regard to them within the assessments.	BDC has no specific concerns to raise in respect to planning and policy.	<b>Agreed</b>
Baseline Environment	The baseline information utilised to inform the assessment and the methodology used to assess impacts on the above ground historic environment, in Volume 3, Chapter 5: Historic Environment of the Environmental Statement is appropriate.	BDC has no specific concerns to raise in respect to the baseline and assessment methodology, they are considered appropriate to inform the assessment.	<b>Agreed</b>
Assessment conclusions	<p>The assessment of potential effects on the historic environment in Section 5.11 of Volume 3, Chapter 5: Historic Environment of the Environmental Statement is appropriate and accurate given the implementation of the measures adopted as part of Hornsea Three (outlined in Section 5.10 of Volume 3, Chapter 5: Historic Environment of the Environmental Statement).</p> <p>Paragraph 1.6.2.52 of Volume 6, Annex 5.1: Desk Based Assessment of the Environmental Statement (APP-149) briefly describes the baseline in terms of Oulton former airfield and notes that some of the buildings remain, including the control tower and that a large portion of the runways were removed in 1979. In addition, this annex notes that the airfield is an undesignated heritage asset by including its Historic Environment Record (HER) number (this is HER number 7364). The Works Plan - Onshore (APP-013) show Works Numbers 13 and 14 (the main construction</p>	<p>BDC's concern focuses on the main construction compound, on the former airfield which is itself an undesignated heritage asset which is also close to Blickling Conservation Area as well as listed buildings.</p> <p>BDC note that detail on the use and layout of the main construction compound, including fencing and lighting, which have the greatest potential to impact the setting of the Conservation Area and nearby listed buildings, would be provided at the detailed design stage and would be agreed with BDC through the final CoCP. BDC are satisfied that sufficient principles are included within these outline documents and that these will be incorporated into the final documents post-consent.</p>	<b>Agreed</b>

Discussion Point	The Applicant's Position	Broadland District Council's Position	Final Position
	<p>compound and associated access), which are secured through DCO, as being located on the existing hardstanding at the former airfield. It is the Applicant's view that Oulton Airfield has arguably lost much of its heritage value due to removal of features as noted above.</p> <p>Notwithstanding this, it is noted that the proposed use as a Main Construction Compound (set out throughout the application. Paragraphs 3.7.3.31 to 3.7.3.32 of Volume 1, Chapter 3: Project Description and paragraphs 4.1.7.3 to 4.1.7.6 inclusive of the Outline CoCP (APP_179)) means that no intrusive works would occur and it would be in temporary use only. The airfield already comprises hard standing suitable for the temporary placement of site facilities (such as offices, briefing rooms, catering facilities, storage etc. typically housed in port-a-cabins) and to allow plant and materials to be stored safely and securely. Therefore, no significant effects to Oulton Airfield are anticipated.</p> <p>Finally, paragraph 5.11.1.158 et seq. of Volume 3, Chapter 5: Historic Environment (APP-077) of the Environmental Statement outlines the assessment of the setting of the Blickling Conservation Area, located some 600 m east of the main construction compound at its nearest point. It concludes that no significant effects will occur as a result of Hornsea Three.</p>		

Discussion Point	The Applicant's Position	Broadland District Council's Position	Final Position
	<p>Designed in measures, as set out in Volume 3, Chapter 5: Historic Environment of the Environmental Statement are considered sufficient to mitigate potential impacts on heritage assets.</p> <p>No further mitigation to those embedded measures identified in Section 5.10 of Volume 5: Historic Environment of the Environmental Statement and the Outline CoCP (APP-179) are necessary as a result of the assessment conclusions.</p>	<p>BDC are satisfied that a robust route refinement process has been undertaken to optimise the route in respect of avoiding designated and undesignated heritage assets where possible.</p>	<b>Agreed</b>
	<p>The Cawston Conservation Area was screened out of the assessment in respect to impacts from the onshore HVAC booster station as it was located outside of the ZTV (see Annex 5.4: Screening Assessment – Onshore HVAC Booster Station [APP-153] of the Environmental Statement). Furthermore, no significant effects were identified in Volume 3, Chapter 7: Traffic and Transport, Volume 3, Chapter 8: Noise and Vibration or Volume 3, Chapter 9: Air Quality of the Environmental Statement resulting from Hornsea Project Three. On this basis, there was no indication that other environmental factors would affect the settings of heritage assets, and a full assessment of the Cawston Conservation Area was not assessed within Volume 3, Chapter 5: Historic Environment of the Environmental Statement.</p> <p>The Applicant has undertaken baseline noise and vibration surveys within Cawston Village, as well as an assessment of potential impacts from the traffic movements associated with Hornsea Three. This assessment has concluded that there would be no significant vibration impacts on heritage assets. These findings were submitted at Deadline 7.</p>	<p>BDC welcomes the reduction of traffic through Cawston (based on the HGV reduction) and has reviewed the noise and vibration report following its submission at Deadline 7. BDC notes that the applicant has offered to reduce the length of the 'working day' for traffic movements through Cawston to 9.5 hours, together with the traffic management proposals including a reduced speed limit. These details are to be included in the revised CTMP. Based on these mitigation measures BDC are satisfied that no significant effects will occur on the historic environment.</p>	<b>Agreed</b>
	<p>The assessment of potential cumulative effects on the historic environment in Section 5.13 of Volume 3, Chapter 5: Historic</p>	<p>BDC has no specific concerns to raise in respect to</p>	<b>Agreed</b>

Discussion Point	The Applicant's Position	Broadland District Council's Position	Final Position
	Environment of the Environmental Statement is appropriate and accurate.	cumulative effects.	
<b><i>Draft Development Consent Order (APP-027)</i></b>			
Commitments / restrictions	The commitment to produce a CoCP (Requirement 17 of the draft DCO), that must be approved by relevant planning authority (including Broadland District Council) prior to the commencement of works are appropriate control measures for managing the potential effects the historic environment. The CoCP will include all relevant embedded measures cited within Volume 3, Chapter 5: Historic Environment of the Environmental Statement, as well as the Outline CoCP (APP-179).	BDC will review and provide input into the preparation of the final CoCP as appropriate. BDC are satisfied that sufficient principles are included within the outline COCP in respect to heritage impacts and that these will be incorporated into the final documents post-consent.	<b>Agreed</b>

**Traffic and Transport:**

- 3.9 As noted in paragraph 2.3, all traffic and transport matters are deferred to Norfolk County Council with the exception of those impacts and proposals at the main construction compound (along The Street). BDC also have an interest in the ongoing development of the Outline CTMP, particularly as it relates to Cawston village, although their interest relates to the interests in residential amenity and heritage as the village is a Conservation Area with many listed buildings, as opposed to traffic and transport.
- 3.10 Hornsea Three has the potential to impact upon these locations, and these impacts are considered within Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement (APP-079). An Outline Construction Traffic Management Plan (Outline CTMP, APP-176) has been prepared that captures the principles of management and mitigation measures associated with this topic.
- 3.11 Table 3.5 identifies the status of discussions relating to this topic between the parties.

Table 3.5: Traffic and Transport.

Discussion Point	The Applicant's Position	Broadland District Council's Position	Final Position
<b>Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement (APP-079)</b>			
Assessment Conclusions and Mitigation	<p>The effect of Hornsea Three traffic flows, as well as the cumulative effects of Hornsea Three in combination with Norfolk Vanguard/Norfolk Boreas have been considered and suitable options to manage the flows are set out in an updated version of the Main Construction Compound Access Strategy submitted as Appendix 1 at Deadline 3. This Strategy sets out four access strategy options for vehicles to and from the main construction compound and demonstrates how vehicles could access the compound from the B1149 via The Street in a safe and efficient manner. The strategy addresses matters relating to driver delay; pedestrian amenity and accidents and road safety. It also demonstrates how the access overcomes concerns raised in respect to other projects (e.g. AD facility (planning application reference 20130860).</p> <p>NCC as the local highway authority, have confirmed the in-principle agreement to Option 1: Passing Places as presented in Annex A of Appendix 1 of the Applicant's response to Deadline 3. It has been agreed that the principle of the access will be secured through the Outline CTMP (APP-176) although the mechanism for delivery (278 Agreement or licence) remains under discussion with NCC. Further site-specific details would be developed during detailed design and will be set out in the detailed CTMP (Requirement 18 of the draft DCO). This will be submitted to Norfolk County Council (as Local Highway Authority) for approval, with consultation with BDC (as Local Planning Authority), OPC and Norfolk Vanguard/Norfolk Boreas as appropriate.</p>	<p>BDC notes that NCC have confirmed an in-principle agreement to Option 1 – passing places and that further consultation will be undertaken with BDC as part of the detailed CTMP.</p> <p>BDC welcomes confirmation that specified works to The Street are to be temporary.</p>	<b>Agreed</b>

Discussion Point	The Applicant's Position	Broadland District Council's Position	Final Position
	<p>The Access Strategy is a 'live' document and continues to be developed as part of ongoing discussions with the Norfolk County Council, OPC Working Group, Broadland District Council and Norfolk Vanguard/Norfolk Boreas. The Applicant is committed to continuing this engagement and is confident that a reasonable solution which is acceptable to Norfolk County Council, as the local highways authority, will be reached, in consultation with OPC, Broadland District Council and Norfolk Vanguard/Norfolk Boreas.</p> <p>Based on consultation with NCC, it has been agreed that works to The Street would be temporary (removed and reinstated to condition commensurate with baseline condition following the completion of each construction phase, unless otherwise agreed with the local highway authority). Works at the B1149/The Street junction are anticipated to be permanent as the works would provide an improvement in visibility at the junction, improving safety. Works to the road hump would also be permanent.</p> <p>It is noted that, in response to concerns raised by Oulton Parish Council (OPC), the Applicant has considered an alternate 'Option R' access strategy to the main construction compound (Options R 'A'; Option R 'C1'; Options R 'C2'). This option remains under consideration, in consultation with NCC, BDC and OPC. Given the availability of an existing road, the potential environmental impacts associated with Option 'R' and potential cumulative impacts, the Applicant considers that, although Option R may provide some benefits associated with redirecting Hornsea Three project traffic away from The Street, Option 1: Passing Places remains the preferred access option to the main construction compound.</p>		



Discussion Point	The Applicant's Position	Broadland District Council's Position	Final Position
	<p>As noted in the written summary of ISH4 (REP3-006), the Applicant has committed to a refinement in the depth of the haul road, which has resulted in a reduction in HGV movements which equates to approximately one third less movements on the network. This has reduced the traffic movements through Cawston. The Applicant developed a proposed set of management measures which has been subject to consultation with Cawston Parish Council working group, Broadland District Council and Norfolk County Council. The Applicant is in the process of responding to this feedback and will provide a revised outline scheme to these stakeholders prior to Deadline 7.</p> <p>Hornsea Three and Norfolk Vanguard continue to engage to reach a shared common point of agreement on this cumulative link. As agreed with BDC, matters relating to traffic and transport have been deferred to NCC.</p>	<p>BDC notes that the Applicant has and will continue to liaise with NCC to reach an appropriate solution at Cawston in respect to traffic and transport. BDC defer matters relating to traffic and transport to NCC, but would welcome continued involvement and consultation on the emerging intervention scheme in respect to residential amenity (as noted in other sections of this SoCG).</p>	<p><b>Agreed in respect to traffic and transport</b> <b>Amenity impacts under discussion (as per below)</b></p>
<b>Outline Management Plans</b>			
<p>Traffic and transport management</p>	<p>The management measures described to minimise impacts on traffic and transport in the Outline CTMP (APP-176) and Outline CoCP (APP-179) are appropriate.</p> <p>The Applicant has agreed to add a commitment within the Outline CTMP which recognises that in some locations, additional management measures may apply to the movement of abnormal loads in close proximity to sensitive receptors. The exact nature of the measures as well as the locations and timings for when they will apply will be agreed with the highway authority and relevant planning authority environmental health officer post-consent as part of the detailed CTMP.</p>	<p>BDC are satisfied that sufficient principles are included within the outline CTMP with the exception of the points above and that further details will be incorporated into the final documents post-consent.</p>	<p><b>Agreed</b></p>



### **Noise and Vibration**

- 3.12 Hornsea Three has the potential to impact upon noise and vibration, and these impacts are considered within Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement (APP-080). An Outline Code of Construction Practice (Outline CoCP, APP-179) has been prepared that captures all relevant management and mitigation measures associated with this topic.
- 3.13 Table 3.6 identifies the status of discussions relating to this topic between the parties.

Table 3.6: Noise and vibration.

Discussion Point	The Applicant's Position	Broadland District Council's Position	Final Position
<b>Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement (APP-080)</b>			
Planning and Policy	Section 8.4 of Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement has identified all appropriate plans and policies relevant to noise and vibration in the application area and has given due regard to them within the assessments.	BDC has no specific concerns to raise in respect to planning and policy.	<b>Agreed</b>
Baseline and Assessment methodology	The baseline information utilised to inform the assessment and the methodology used to assess impacts on noise and vibration in Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement is appropriate.  Baseline information on noise and vibration within the Hornsea Three noise and vibration study area was collected through a detailed desktop review (see paragraph 8.6.1.1 of Volume 3, Chapter 8: Noise and Vibration). Where existing noise levels are generally low (as is the case along the onshore cable corridor within BDC), construction criteria are independent of the precise noise levels. Consequently, no site specific noise baseline surveys were undertaken for locations where only construction noise was predicted to be generated. This approach is considered to be appropriate.	BDC has no specific concerns to raise in respect to the baseline and assessment methodology, they are considered appropriate to inform the assessment.	<b>Agreed</b>
Assessment conclusions	The assessment of potential effects on noise and vibration along the onshore cable corridor during the construction, operation and maintenance, and decommissioning of Hornsea Three in Section 8.12 of Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement is appropriate and accurate given the implementation of the measures adopted as part of Hornsea Three	BDC are satisfied that effects relating to noise and vibration are unlikely to be significant along the onshore cable corridor. However, BDC would be grateful for further evidence of the noise levels which would be expected at the HDD location to confirm this.	<b>Agreed</b>

Discussion Point	The Applicant's Position	Broadland District Council's Position	Final Position
	<p>(outlined in Section 8.11 of Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement).</p> <p>In respect to the HDD locations, a large HDD rig would include a large diesel power-pack for the drill rig; pumps and auxiliary plant for the processing of bentonite, slurry and cuttings with associated power generation plant; and generators for site lighting and welfare facilities. Source terms for this typical plant have been based on available sources of information including BS 5228-1 (BSI 2014b). These source terms have fed into the construction noise model, see Volume 6, Annex 8.2: Construction Noise Model Output which has then informed the assessment conclusions reported in paragraphs 8.12.1.9 – 8.12.1.11. This concludes that no significant effects would occur as a result of the HDD works along the onshore cable corridor.</p> <p>The location of major HDD compounds will be determined for each individual major HDD location once a contractor is appointed and the detailed design of the onshore cable corridor, including length of cables and cable trench location are known. Notwithstanding this, Hornsea Three will seek to site major HDD compounds in areas which reduce interference with farming operations and minimise impacts to landowners' use of their land and ecological sensitive receptors. The Applicant has amended paragraph 4.1.7.14 of the Outline CoCP (APP-179) to secure this (see below).</p> <p><i>"4.1.7.14 It is envisaged that only the major HDDs (i.e. typically greater than 200 m in length) will require a compound, which will be used to contain the drilling rig, equipment and the drill entry and exit pit. <u>Any structures at the compounds will be no greater than one storey in height, whilst any portable task lighting or security lighting fixtures (used in times of low natural light) would be no</u></i></p>		

Discussion Point	The Applicant's Position	Broadland District Council's Position	Final Position
	<p><i>greater than 4 m in height and directional to avoid light spill. These compounds have all been provided for within the onshore cable corridor (i.e. within the Order Limits) and will where possible, be located in areas which reduce interference with farming operations and minimise impacts to residential properties, ecologically sensitive receptors and landowners use of their land. The size of the HDD compounds is dependent on the amount of equipment that is required to construct the crossing, which in turn is primarily governed by the length of the HDD or its complexity."</i></p>		
	<p>The measures identified in the Outline CoCP are appropriate and sufficient to reduce the potential for emissions and noise impacts on sensitive receptors in the vicinity of the Main Construction Compound as a result of the operation of the main construction compound itself (access is addressed separately below). For example, construction works will be undertaken in accordance with the best practicable means (as defined in Section 72 of the Control of Pollution Act 1974), to minimise noise and vibration effects. Measures specific to the Main Construction Compound, in particular the use of generators on site, vehicle movements on site amongst others and the use of reversing alarms from vehicles, will be developed as part of the detailed CoCPs (Schedule 1, Part 3, DCO Requirement 17) which will be agreed with the local planning authorities prior to commencement.</p>	<p>BDC note that detail on the use of the main construction compound, including use of generators vehicle movements and reversing alarms have the greatest potential to have a noise impact, would be provided at the detailed design stage and would be agreed with BDC through the final CoCP. BDC are satisfied that sufficient principles are included within these outline documents and that these will be incorporated into the final documents post-consent.</p>	<p><b>Agreed</b></p>
	<p>The Applicant has undertaken baseline surveys and an assessment of noise and vibration impacts on the Old Railway Gatehouse. With the designed-in mitigation in place (speed restriction, regrading of the road hump and additional measures for abnormal load movements), as well additional measures which</p>	<p>BDC notes the combination of noise and vibration reduction measures that the applicant is now proposing in respect of The Old Railway Gatehouse, the physical alterations to the property need to be agreed with the</p>	

Discussion Point	The Applicant's Position	Broadland District Council's Position	Final Position
	<p>have been committed to, the Applicant considers that the noise level would be reduced to a level which is not significant in EIA terms. These additional measures comprise the following:</p> <ul style="list-style-type: none"> <li>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</li> <li>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.</li> </ul> <p>These commitments will be secured through wording to be added to the Outline CTMP at Deadline 9. These mitigation measures, will ultimately be secured by means of the detailed CTMPs to be submitted and agreed with the local planning authority and Highways Authority prior to commencement (Requirement 18 of the draft DCO).</p> <p>Additional matters are addressed in the attached Appendix.</p>	<p>resident, however the principle of the mitigation measures specified are acceptable and need to be secured by revised wording in the Outline and detailed CTMP.</p>	<p><b>Agreed</b></p>
	<p>The Applicant prepared an assessment of noise and vibration impacts which may be caused by the movement of abnormal loads outside of the core working hours, as well as at night-time (to represent a maximum design scenario), and a comparison of the assessment results against WHO levels, to provide further evidence that no significant effects are expected on the Old Railway Gatehouse. This was provided as Appendix 24 at Deadline 7 (REP7-044). Further clarification was provided to BDC in the form of a worked example of the detailed calculations from section 4 of the report, and the Applicant now understands this</p>	<p>BDC notes the combination of noise and vibration reduction measures that the applicant is now proposing in respect of The Old Railway Gatehouse, and the management of abnormal loads outside of the core working hours. The proposed physical alterations to the property need to be agreed with the resident, however the principle of the mitigation measures specified are acceptable and need to be secured by revised wording in the Outline and detailed CTMP.</p>	<p><b>Agreed</b></p>

Discussion Point	The Applicant's Position	Broadland District Council's Position	Final Position
	<p>matter to be agreed. The Applicant has added a commitment within the Outline CTMP which recognises that in some locations, additional management measures may apply to the movement of abnormal loads in close proximity to sensitive receptors. The exact nature of the measures as well as the locations and timings for when they will apply will be agreed with the highway authority and relevant planning authority environmental health officer post-consent as part of the detailed CTMP. However, this is considered a suitable mitigation measure to minimise any impacts associated with movements outside of the core working hours.</p>		
	<p>The Applicant has sought to minimise the potential noise and vibration impacts within Cawston Village, through the refinements in the Hornsea Three HGV traffic flows, following reduction of the haul road depth<sup>1</sup>. Although the refinement in HGV movements will not have a bearing on the conclusions of the ES or the TA (which continue to represent the maximum design scenario), the revised traffic flows have been used to inform the refinement of the Outline CTMP, and the identification of any associated noise and vibration mitigation.</p> <p>The Applicant has developed a proposed set of traffic management</p>	<p>BDC welcomes the reduction of traffic through Cawston (based on the HGV reduction) and has reviewed the noise and vibration report following its submission at Deadline 7. BDC notes that the applicant has offered to reduce the length of the 'working day' for traffic movements through Cawston to 9.5 hours, together with the traffic management proposals including a reduced speed limit. The applicant has also offered to maximise the use of Heydon Road where practicable. These details are to</p>	<p><b>Agreed</b></p>

<sup>1</sup> As noted in the written summary of ISH4, the Applicant has committed to a refinement in the depth of the haul road, comprising a reduction from 1m to 0.5m, which has resulted in a reduction in HGV movements which equates to approximately one third less movements on the network (367,529 to 260,804). Details of this reduction will be provided as an appendix to be submitted at Deadline 4. This reduction continues to allow for some contingency for maintenance and variations in ground conditions along the onshore cable corridor route, and will be secured through an addition of the following statement within the Outline CTMP: Paragraph 4.3.1.4 "The haul road(s) would have a maximum aggregate depth of 0.5 m."



Discussion Point	The Applicant's Position	Broadland District Council's Position	Final Position
	<p>measures which has been subject to consultation with Cawston Parish Council working group, Broadland District Council and Norfolk County Council. The Applicant has provided BDC with the current outline proposals for the traffic management scheme, which has been agreed in principle with NCC.</p> <p>The Applicant has undertaken baseline noise and vibration surveys within Cawston Village, as well as an assessment of potential impacts from the traffic movements associated with Hornsea Three. This assessment has concluded that there would be no significant noise and vibration impacts on the residential properties of Cawston Village as a result of Hornsea Three. The findings were submitted at Deadline 7 (Appendix 26 - REP7-046). Further clarification was provided to BDC in the form of a worked example of the detailed calculations from section 4 of the report, and the Applicant now understands this matter to be agreed.</p> <p>The Applicant has engaged with Norfolk Vanguard to reach a shared common point of agreement, and has agreed a maximum traffic cap for HGVs on this link in order to avoid significant noise and vibration effects on residential receptors under the cumulative scenario. This maximum traffic cap has been identified within the Outline CTMP to be submitted at Deadline 9 and comprises up to 668 total movements of which 271 can be HGV movements.</p>	<p>be included in the revised CTMP. Based on these mitigation measures BDC are satisfied that it is unlikely that any significant effects will occur on noise and vibration in Cawston.</p> <p>BDC await confirmation of the maximum traffic cap as a result of the cumulative impact of traffic in Cawston from the Orsted and Vanguard windfarm proposals.</p>	
	<p>No further mitigation to those embedded measures identified in Section 8.11 of Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement the Outline CoCP (APP-179) are necessary.</p>	<p>BDC are satisfied with the mitigation proposed.</p>	<p><b>Agreed</b></p>
	<p>The assessment of potential cumulative impacts on noise and vibration in Section 8.14 of Volume 3, Chapter 8: Noise and</p>	<p>BDC are satisfied with the cumulative effects assessment undertaken.</p>	<p><b>Agreed</b></p>

Discussion Point	The Applicant's Position	Broadland District Council's Position	Final Position
	Vibration of the Environmental Statement is appropriate and accurate.		
<b><i>Draft Development Consent Order (APP-027)</i></b>			
Commitments / restrictions	The commitment to produce a CoCP (Requirement 17 of the dDCO), that must be approved by relevant planning authority (including Broadland District Council) prior to the commencement of works are appropriate control measures for managing the potential effects of noise and vibration. The CoCP will include all relevant embedded measures cited within Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement, as well as the and Outline CoCP (APP-179).	BDC will review and provide input into the preparation of the final CoCP as appropriate.	<b>Agreed</b>
<b><i>Outline Management Plans</i></b>			
Noise and Vibration management	The management measures described to minimise impacts on noise and vibration in the Outline CoCP (APP-179) are appropriate.	BDC are satisfied that sufficient principles are included within the outline CoCP and that further details will be incorporated into the final documents post-consent.	<b>Agreed</b>

### **Air Quality**

- 3.14 Hornsea Three has the potential to impact upon air quality, and these impacts are considered within Volume 3, Chapter 9: Land Use and Recreation of the Environmental Statement (APP-081). An Outline Code of Construction Practice (Outline CoCP, APP-179) has been prepared that captures all relevant management and mitigation measures associated with this topic.
- 3.15 Table 3.6 identifies the status of discussions relating to this topic between the parties.

Table 3.7: Air Quality.

Discussion Point	The Applicant's Position	Broadland District Council's Position	Final Position
<b>Volume 3, Chapter 9: Air Quality (APP-081)</b>			
Planning and Policy	Section 9.4 of Volume 3, Chapter 9: Air Quality of the Environmental Statement has identified all appropriate plans and policies relevant to air quality in the application area and has given due regard to them within the assessments.	BDC has no specific concerns to raise in respect to planning and policy.	<b>Agreed</b>
Baseline and Assessment methodology	The baseline information utilised to inform the assessment and the methodology used to assess impacts on air quality in Volume 3, Chapter 9: Air Quality of the Environmental Statement is appropriate.	BDC has no specific concerns to raise in respect to the baseline and assessment methodology, they are considered appropriate to inform the assessment.	<b>Agreed</b>
Assessment conclusions	The assessment of potential effects on air quality during the construction, operation and maintenance, and decommissioning of Hornsea Three in Section 8.11 of Volume 3, Chapter 9: Air Quality of the Environmental Statement is appropriate and accurate given the implementation of the measures adopted as part of Hornsea Three (outlined in Section 9.10 of Volume 3, Chapter 9: Air Quality of the Environmental Statement).	BDC has no specific concerns to raise in respect to air quality effects.	<b>Agreed</b>
	No further mitigation to those embedded measures identified in Section 9.10 of Volume 3, Chapter 9: Air Quality of the Environmental Statement the Outline CoCP (APP-179) are necessary as a result of the assessment conclusions.	BDC is satisfied that suitable measures to minimise air quality impacts, including dust impacts along the onshore cable corridor and at the main construction compound, are incorporated into the Chapter or Outline CoCP.	<b>Agreed</b>
	The assessment of potential cumulative effects on air quality in Section 9.13 of Volume 3, Chapter 9: Air Quality of the Environmental Statement is appropriate and accurate.	BDC has no specific concerns to raise in respect to the cumulative effects assessment.	<b>Agreed</b>

Discussion Point	The Applicant's Position	Broadland District Council's Position	Final Position
<b><i>Draft Development Consent Order (APP-027)</i></b>			
Commitments / restrictions	The commitment to produce a CoCP (Schedule 1, Part 3, Requirement 17 of the draft DCO), that must be approved by relevant planning authority (including Broadland District Council) prior to the commencement of works are appropriate control measures for managing the potential effects on air quality. The CoCP will include all relevant embedded measures cited within Volume 3, Chapter 9: Air Quality of the Environmental Statement, as well as the Outline CoCP (APP-179).	BDC will review and provide input into the preparation of the final CoCP as appropriate.	<b>Agreed</b>
<b><i>Outline Code of Construction Practice (APP-179)</i></b>			
Air Quality management	The management measures described to minimise impacts on air quality in the Outline CoCP (APP-179) are appropriate.	BDC are satisfied that sufficient principles are included within the outline CoCP and that further details will be incorporated into the final documents post-consent.	<b>Agreed</b>

### **Socio-economics**

- 3.16 Hornsea Three has the potential to impact upon socio-economics, and these impacts are considered within Volume 3, Chapter 10: Socio-economics of the Environmental Statement (APP-082). Table 3.6 identifies the status of discussions relating to this topic between the parties.

Table 3.8: Socio-economics.

Discussion Point	The Applicant's Position	Broadland District Council's Position	Final Position
<b>Volume 3, Chapter 10: Socio-economics (APP-082)</b>			
Planning and Policy	Section 10.4 of Volume 3, Chapter 10: Socio-economics of the Environmental Statement has identified all appropriate plans and policies relevant to socio-economics in the application area and has given due regard to them within the assessments.	BDC has no specific concerns to raise in respect to planning and policy.	<b>Agreed</b>
Baseline and Assessment methodology	The baseline information utilised to inform the assessment and the methodology used to assess socio-economic impacts in Volume 3, Chapter 10: Socio-economics of the Environmental Statement is appropriate.	BDC has no specific concerns to raise in respect to the baseline and assessment methodology, they are considered appropriate to inform the assessment.	<b>Agreed</b>
Assessment conclusions	<p>The assessment of potential effects on socio-economics during the construction, operation and maintenance, and decommissioning of Hornsea Three in Section 10.11 of Volume 3, Chapter 10: Socio-economics of the Environmental Statement is appropriate and accurate given the implementation of the measures adopted as part of Hornsea Three (outlined in Section 10.10 of Volume 3, Chapter 10: Socio-economics of the Environmental Statement).</p> <p>The socio-economic effects on tourism and recreation are addressed under the assessment of effects on receptors relating to offshore tourism/recreation activities, coastal tourism and onshore tourism/recreational resources. The effects during the construction phase are assessed in paragraphs 10.11.1.125 to 10.11.1.132 of Volume 3, Chapter 10: Socio-Economics (APP-082). Effects during O&amp;M are assessed in paragraphs 10.11.2.102 to 10.11.2.117 and effects associated with decommissioning activity are assessed in paragraph 10.11.3.43 to 10.11.3.52.</p>	BDC has no specific concerns to raise in respect to socio-economic effects and is satisfied that sufficient consideration has been given to the potential for impacts on tourism.	<b>Agreed</b>

Discussion Point	The Applicant's Position	Broadland District Council's Position	Final Position
	No further mitigation to those embedded measures identified in Section 10.10 of Volume 3, Chapter 10: Socio-economics of the Environmental Statement are necessary as a result of the assessment conclusions.	BDC is satisfied with the mitigation measures relevant to socio-economics.	<b>Agreed</b>
	The assessment of potential cumulative effects on socio-economics in Section 10.13 of Volume 3, Chapter 10: Socio-economics of the Environmental Statement is appropriate and accurate.	BDC has no specific concerns to raise in respect to the cumulative effects assessment.	<b>Agreed</b>
<b><i>Draft Development Consent Order</i></b>			
Commitments / restrictions	The commitment to produce a skills and employment plan (Requirement 22 of the draft DCO) in consultation with New Anglia Local Enterprise Partnership and approved by the relevant planning authority is appropriate.	BDC is satisfied with this commitment	<b>Agreed</b>



## 4. Summary

- 4.1 This SoCG has been developed with Broadland District Council to capture those matters agreed, under discussion and not agreed in relation to ecology and nature conservation, landscape and visual resources, traffic and transport, noise and vibration, air quality and socio-economics.
- 4.2 All matters relating to the following have been agreed between parties:
- Landscape and Visual Amenity;
  - Ecology and Nature Conservation;
  - Traffic and Transport;
  - Air Quality;
  - Socio-Economics;
  - Historic Environment; and
  - Noise and Vibration.
- 4.3 The Applicant is committed to continued engagement with BDC as part of the post-consent discharge of Requirements.

## Appendix A to the BDC Statement of Common Ground

The following table provides a summary of comments raised by BDC's Environmental Health Officer to the Applicant, along with responses from the Applicant. Although points relating to proposed uses of the main construction compound and associated traffic flows have been addressed, the Applicant would summarise that the traffic flows along The Street would be limited on a daily basis to 118 HGV movements and 130 staff vehicles (which the Applicant will be including as a maximum threshold within the Outline CTMP at a future examination deadline). As such, should traffic movements associated with a specific activity increase, they would need to do so as a proportion of this total, not as increase on the overall total identified. As such, the mitigation identified by the Applicant is appropriate for a maximum design scenario.

Comments made by Broadland District Council	Hornsea Project Three Comments/Response	Subsequent comments made by BDC	Hornsea Three Comments/Response
<p><i>Temporary Roadway</i></p> <p>The copy spreadsheet at D4 APP 7Annex C JNY8772 allows for 2 x 6m x 0.5 roadways and their removal. This equates to just over half a million tonnes of Type 1 material @1.8t/m3. My understanding (which may be incorrect) is that this type of material is in short supply in the county and that it is not uncommon for Norwegian Granite to be sourced from Great Yarmouth docks for example. I agree that the road thickness is generous and allows for makeup and parking and standing areas but if imported granite is used I am told that the density is nearer to 2.5 tonnes rather than 1.8 tonnes /m3 meaning that HGV movements could be higher and vehicle movements might be increased in urban/industrial port areas.</p> <p>I understand that Orsted want/have to retain flexibility and that Sarah explained that it is possible that the cable corridor might be handed back to landowners in between the 2 construction phases. I do feel however that Orsted must give serious consideration to reducing the number of 2 way moves for the roadway construction which stands at just under 107000 movements with all their attendant noise and pollution.</p>	<p>Suppliers to be utilised for the project will be determined during detailed design. Hornsea Three has allowed for up to two haul roads of 6 m in width, and 0.5 in depth along the onshore cable corridor – this is considered a maximum design scenario. The traffic flows utilised within the assessments, and which have informed the development of the Outline Construction Traffic Management Plan, are based on these maximum design values. For key links which are considered to be particularly sensitive (e.g. Cawston), Hornsea Three will be identifying maximum traffic flows which are permitted on a given day – this will be set out and thus secured through the Outline CTMP (to be submitted at Deadline 8). We will however, communicate the locations and maximum flows with NCC (as local highway authority) and the relevant local planning authority earlier if possible.</p> <p>Given that these flows will be secured through the Outline CTMP, any variation in the specification of the material will not affect the maximum construction traffic flows.</p>	<p>We look forward to receiving details of your maximum traffic flows for Cawston and the Oulton compound as soon as you are able to provide them.</p> <p>We remain disappointed that the applicant is not prepared to consider ways in which the number of HGV movements can be reduced particularly at Cawston and Oulton.</p> <p>I understand that if you have to import a granite based material it may not increase maximum construction flows but it could increase overall movements by 30% due to the higher density of the material</p>	<p>The Applicant has continued engagement with BDC to resolve outstanding clarifications, and would refer to the responses to the ExA's Rule 17 issued to the Applicant dated 19<sup>th</sup> March 2019, as well as responses provided to written representations from Cawston Parish Council in respect to traffic flow fluctuations and alternatives considered.</p>
<p><i>Cable Ducting</i></p> <p>Sarah confirmed that cable ducting would be used for the whole project. As stated this allows flexibility for cable installation. Please can you confirm whether ducting will be directly delivered to the cable corridor and whether ducting material will be stored at Oulton ?</p>	<p>Hornsea Three has allowed for ducting material to be stored at the main constructon compound at Oulton (as set out in paragraph 3.17, second bullet point, of Appendix 20 to Deadline 1, REP1-176) before being transported to the onshore cable corridor. The assessment presented within the Environmental Statement (and subsequent documentation) has been undertaken on this maximum design scenario. However, depending on the approach adopted by the contractor (who will be appointed during</p>	<p>We welcome the acknowledgement that it may be possible to deliver ducting directly to the cable corridor but wish the applicant could offer more commitment at this stage</p> <p>We look forward to a response to this</p>	<p>It is not possible for the Applicant to provide any further commitments regarding the logistics of duct movement at this stage in the planning process. The Applicant will however, continue to engage with BDC during the development of the detailed design, in particular the</p>

Comments made by Broadland District Council	Hornsea Project Three Comments/Response	Subsequent comments made by BDC	Hornsea Three Comments/Response
<p>Is there an opportunity to reduce HGV movements by moving the temporary road way material along the corridor once ducting has been installed in one area to allow access for the next length?</p>	<p>detailed design), there is potential that ducting would be delivered directly to the relevant section of the onshore cable corridor, or to secondary construction compounds, or storage areas along the onshore cable corridor.</p>	<p>question in due course.</p>	<p>detailed CTMP.</p>
<p><i>Sand Cable surround</i> Where will treated sand be obtained and where will it be treated. Will the Oulton compound be used?</p>	<p>Sand to be used within the cable trenches will be delivered directly to the onshore cable corridor (pre-treated) and therefore would not be transported to and from the main construction compound.</p> <p>The Applicant is committed to continued engagement with BDC to resolve outstanding clarifications.</p>	<p>Thankyou for for confirming this point.I understand from JNY8772 that the development will require almost 870000 tonnes of cement bound sand which equates to approximately 86000 vehicle movements for the whole corridor.6500 of those movements are predicted to pass through Cawston to serve sections 9 and 10 of the cable corridor. Does the applicant know whether it might be possible to prepare the CBS on the corridor using excavated material from the trenches for example?</p>	<p>The Applicant has identified specific measures to protect the quality of the sub-soil and top-soil along the onshore cable corridor within the Outline Soil Management Strategy contained within the Outline CoCP (REP7-060). These measures are designed to ensure that land will be restored to a condition suitable to be returned to its former use and therefore seek to avoid, as far as practicable any alterations to the condition or characteristics of the soil. As such, excavated soil would not be used for any uses other than direct reinstatement.</p> <p>Further details on the logistics of the construction, including deliveries of material to the onshore cable corridor, will be determined once a contractor has been appointed, post-consent. The Applicant will continue to</p>

Comments made by Broadland District Council	Hornsea Project Three Comments/Response	Subsequent comments made by BDC	Hornsea Three Comments/Response
			engage with BDC during the development of the detailed design, in particular the detailed CoCP and CTMP.
<p><i>Subsoil removal</i></p> <p>Can you confirm that no subsoil will be removed from the cable corridor?</p>	<p>Stripping of subsoil resources along the length of the onshore cable corridor will be limited to the construction of the cable trenches (up to six trenches), HDD entry/exit pits at crossing locations, joint bays and link boxes.</p> <p>Subsoil will then be stored within the onshore cable corridor, alongside the cable trench or excavated location.</p>	<p>Please can you confirm that subsoil will not be removed from the cable corridor as part of the restoration process after storage?</p>	<p>The Applicant can confirm that subsoil would not be removed from the onshore cable corridor as part of the restoration process after storage.</p>
<p><i>Oulton Compound</i></p> <p>You confirmed that every cable drum will be delivered to Oulton where outer protection would be removed and the drum would be prepared for transport to site. Once the cable has been pulled the empty drum would return to Oulton for collection. So am I correct in assuming 4 HGV movements per drum for 800 drums?</p> <p>I have had a chance to look at D1 App20 now and note that drums and ducting will be stored at Oulton so using D4 App7 Annex C JNY 8772 this will account for 9300 2 way journeys approx. ie 4634 x2. Is my assumption correct please?</p> <p>I have also seen reference in Appendix 20: Main Construction Compound Briefing Note that there could be up to 1121 drums. Has any further work been carried out to calculate a more accurate figure?</p> <p>App 20 states that aggregate will be stored on site. I would have hoped that this could be avoided in order to reduce potential noise and dust issues arising from tipping and reloading. Please can you confirm the quantities of aggregate that will be delivered and taken</p>	<p>There is potential for multiple movements associated with each cable drum. Under a maximum design scenario (a worst case), the cable drums will first be delivered to the main construction compound, before being transported to the relevant section of the onshore cable corridor. They may also be transported back to the main construction compound before collection or disposal. The movement of abnormal loads has been incorporated into the total traffic flows assessed for each link.</p> <p>The precise number of abnormal loads will be dependant on the length of section of cable. As set out in Volume 1, Chapter 3: Project Description of the Environmental Statement, the onshore export cables will typically be installed in sections of between 750 and 2,500 m at a time, with each section of cable delivered on a cable drum from which it is spooled out as it is installed. The length of cable sections will be informed by choice of transmission technology, phasing and various parameters at a given location including the distance between committed HDDs, constraints present on site (which may influence the location of joint bays) and the local road network (which may necessitate the use of a smaller cable drum). As such it is not possible to provide a specific number of cable drums.</p>	<p>Understood</p> <p>We look forward to seeing the movement figures that the examiners asked for at the end of the hearing that took place on the 8th March</p>	<p>The Applicant notes that it is not possible to provide a detailed breakdown of traffic flows requested by the ExA at this stage in the design process for these key reasons (with further detailed provided in the Applicant's response to REP7-080):</p> <ul style="list-style-type: none"> <li>- the detailed design and construction programme will be determined by the principle construction contractor and will be based on the contractor's logistics plan. This may influence how the main construction compound is used;</li> <li>- it is imperative the Applicant has the flexibility to utilise the total vehicle movements on a daily basis for a particular</li> </ul>

Comments made by Broadland District Council	Hornsea Project Three Comments/Response	Subsequent comments made by BDC	Hornsea Three Comments/Response
<p>from the site? 1.6.2.39 of APP 159 makes an assumption that aggregates will not be delivered to Oulton.</p> <p>In App 20 para 3.28 mention is made of WQ 1.11.2 and I wondered whether you could direct me to the submission regarding clarity on fluctuation of traffic flows please. Please can you provide the spreadsheet for vehicle movements at Oulton please?</p>	<p>The value provided within Appendix 1 of Deadline 3 (REP-010) was an indicative figure based on approximately 800 m of cable per drum.</p> <p>The shorter the length of cable carried on a single cable drum, the greater the number of abnormal load movements; however, these would not increase the total number of movements and would simply comprise a greater proportion of the maximum traffic flows along The Street on a daily basis. Therefore, it is not considered appropriate to provide a total number of abnormal load movements, as these may change, but it can be confirmed that all traffic flows along The Street would be limited on a daily basis to 118 HGV movements and 130 staff vehicles (which the Applicant will be including as a maximum threshold within the Outline CTMP at a future examination deadline). These movements may occur over the full length of the active use of the main construction compound, which comprises up to 30 months.</p> <p>Although it is correct that aggregate may be stored on the main construction compound, this would be limited to a small quantity of replacement aggregate, should emergency repairs (e.g. to the haul road) be required. The aggregate used for the construction of the haul road within the onshore cable corridor would not be transported to and from, and stored at the main construction compound. As such, as stated within paragraph 1.6.2.39 of APP-159, movements associated with the movement of aggregate for the construction of the haul road and secondary compounds has been scoped out of the transport assessment. Mitigation measures to minimise disturbance to noise sensitive receptors, including those close to the main construction compound, are set out in section 6.2 of the Outline CoCP (REP6-014), which will form the basis of the final CoCP to be submitted and approved by the relevant planning authority under Requirement 17 of the draft DCO. These mitigation</p>		<p>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>Given the above, 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 (to represent a maximum design scenario).</p>

Comments made by Broadland District Council	Hornsea Project Three Comments/Response	Subsequent comments made by BDC	Hornsea Three Comments/Response																													
	<p>measures include the implementation of Best Practicable Means (e.g. where reasonably practicable, the use of quieter alternative methods, plant or equipment; and the use of hoardings, enclosures or acoustic barriers) and agreeing construction noise management measures for specific construction activities with the relevant local authority prior to the start of construction. These measures are considered appropriate to control the noise generated by aggregate handling on a sporadic basis. Notwithstanding this, traffic flows along The Street would be limited on a daily basis to 118 HGV movements and 130 staff vehicles (which the Applicant will be including as a maximum threshold within the Outline CTMP at a future examination deadline).</p> <p>In respect to the total movements to occur along The Street as a result of the construction of Hornsea Three, the Applicant can confirm the maximum flows across the full 30 month active use of the main construction compound are as follows:</p> <table border="1" data-bbox="663 911 1229 1094"> <thead> <tr> <th rowspan="2"></th> <th colspan="3">Daily HOW3 movements</th> <th rowspan="2">Total duration of compound project life (days)</th> <th colspan="3">TOTAL movements</th> </tr> <tr> <th>in</th> <th>out</th> <th>two-way</th> <th>in</th> <th>out</th> <th>two-way</th> </tr> </thead> <tbody> <tr> <td>Lights</td> <td>65</td> <td>65</td> <td>130</td> <td rowspan="2">688</td> <td>44,688</td> <td>44,688</td> <td>89,376</td> </tr> <tr> <td>HGVs</td> <td>59</td> <td>59</td> <td>118</td> <td>40,563</td> <td>40,563</td> <td>81,126</td> </tr> </tbody> </table>		Daily HOW3 movements			Total duration of compound project life (days)	TOTAL movements			in	out	two-way	in	out	two-way	Lights	65	65	130	688	44,688	44,688	89,376	HGVs	59	59	118	40,563	40,563	81,126		
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HGVs	59	59	118		40,563	40,563	81,126																									
<p><i>Old Railway Gatehouse</i></p> <p>I made comments about D6 APP 23</p> <p>It was agreed that a comparison with the recent recommendations of the WHO Europe for traffic noise levels be made so that the existing and predicted noise levels can be compared eg Lden and Lnight? L90 could be helpful as per first sight Cawston information seen on 27th Feb.</p>	<p>The Applicant is mindful that the guidelines relate to strategic analysis of a population's response to noise rather than an individual's response, therefore the guidelines were not previously identified as the most appropriate method to assess the potential effect of Hornsea Three. However, in response to BDC's request, the Applicant has undertaken a comparison with the recent WHO guidelines and has provided this at Deadline 7 (Appendix 24). Baseline LA90 data has also been provided in this submission at Deadline 7.</p>	<p>Noted.</p> <p>BDC would request clarification on the following two points:</p> <ul style="list-style-type: none"> <li>My understanding from para 4.24 is that 118 HGV and 130 non HGV is the maximum peak 18hr weekday traffic flow but table 4.6 refers to AAWT</li> </ul>	<p>The Applicant has provided clarifications to BDC on the traffic flows associated with The Street.</p> <p>In respect to a breakdown of the traffic flows, the Applicant would refer to the above, but remains committed to continued engagement with BDC during the development of the Outline</p>																													

Comments made by Broadland District Council	Hornsea Project Three Comments/Response	Subsequent comments made by BDC	Hornsea Three Comments/Response
<p>My view is that measurement rather than prediction is possibly better but is the derived SEL representative of the proposed situation? There may be increased noise associated with passing places and the regrading of approaches.</p> <p>Do the audio recordings provide evidence to suggest that the “hump” in the road is adding to noise levels?</p> <p>My understanding from para 4.24 is that 118 HGV and 130 non HGV is the maximum peak 18hr weekday traffic flow but table 4.6 refers to AAWT which I assume means Annual Average Weekday Traffic. Please can you clarify.</p> <p>It would be helpful to see the spreadsheet for vehicle traffic movements arriving and departing from Oulton compound with a description of weekday traffic movements over the 30 month period at worst case. This would demonstrate for example whether the assumption at para 5.16 is valid.</p> <p>The cumulative assessment does not use the potato storage movement figures in the Vissim assessment.</p>	<p>The location close to the planned Railway Gatehouse passing bay, there is an existing ‘informal’ passing bay which is used already by vehicles waiting to pass at the Gatehouse. The planned passing bay is therefore formalising an existing arrangement, albeit the intensity of the frequency of the event is increasing. Notwithstanding this, in response to concerns raised by BDC, the Applicant has given further consideration to the stop/start of HGVs using the formal passing bays proposed as part of the traffic intervention measures, and has provided this at Deadline 7 (Appendix 24).</p> <p>In respect to noise levels associated with the presence of the ‘hump’ in the road, we have undertaken a review of studies in relation to the effect of road humps on HGV noise. We will provide further information on this in our clarification note to be submitted at Deadline 7.</p> <p>This approach is consistent with the methodology applied in Volume 6, Annex 8.2: Construction Noise Model Output and the peak weekday traffic flows provide the maximum design scenario.</p> <p>In accordance with the Rochdale Envelope approach, the Applicant has based the assessment of potential significant effects on the maximum design scenario. In respect to traffic movements along The Street (to and from the main construction compound), the Applicant has confirmed that flows would be limited on a daily basis to 118 HGV movements and 130 staff vehicles (which the Applicant will be including as a maximum threshold within the Outline CTMP at a future examination deadline). These movements may occur over the full length of the active use of the main construction compound, which comprises up to 30 months. Although it is noted that these daily movements may be lower during less intense periods of construction, the nature, timing and extent of such fluctuations cannot be confirmed until additional details such as construction programme, number</p>	<p>which I assume means Annual Average Weekday Traffic. Please can you clarify.</p> <ul style="list-style-type: none"> <li>• It would be helpful to see the spreadsheet for vehicle traffic movements arriving and departing from Oulton compound with a description of weekday traffic movements over the 30 month period at worst case. This would demonstrate for example whether the assumption at para 5.16 is valid.</li> </ul>	<p>CTMP.</p>



Comments made by Broadland District Council	Hornsea Project Three Comments/Response	Subsequent comments made by BDC	Hornsea Three Comments/Response
	<p>of work fronts, transmission technology and phasing have been determined. The consideration of potential effects, and the identification of required mitigation has therefore been based on the maximum design scenario, and it is on this assessment that BDC should consider the acceptability of the impacts predicted. The Applicant would refer to a response above regarding the total number of movements along The Street during the total Hornsea Three construction period.</p> <p>In respect to the cumulative assessment, the Applicant can confirm that the flows from the potato storage development have not been included in the baseline. If the flows associated with this development had been included in the baseline when assessing the impacts over an annual average would have increased the baseline noise levels and thus reduce the noise change impact of Hornsea Project Three (which would not represent a worst case assessment).</p> <p>The Applicant is committed to continued engagement with BDC to resolve outstanding clarifications.</p>		
Is baseline speed data available for passing vehicles ?	<p>The Applicant placed equipment to collect baseline speed data as part of the development of the outline intervention schemes, as detailed in Appendix 1 of Deadline 3 (REP3-010). This indicated that, on 16<sup>th</sup> October 2019 on the Street (135 m south of Heydon Road), the 85<sup>th</sup> percentile speeds recorded are as followings:</p> <ul style="list-style-type: none"> <li>- Northbound – 45.1 mph; and</li> <li>- Southbound – 42.2 mph.</li> </ul>	Noted	N/A
Non HGV movements have not been given an SEL figure. Please can you explain.	<p>Two methodologies were used to assess changes in traffic flow. The first was based on CRTN and took into account all construction traffic. This modelling can therefore be summarised as the change in noise that would occur if the hump was not there at the moment or in the future. One of</p>	Noted	N/A

Comments made by Broadland District Council	Hornsea Project Three Comments/Response	Subsequent comments made by BDC	Hornsea Three Comments/Response
	<p>the problems of this method is that it does not take into account the increase in noise due to HGVs caused by the hump in the road. Consequently, we undertook some alternative modelling work to quantify the site specific issue of HGV noise and the road hump. Noise due to non HGV traffic is not affected by the road hump and so the SEL modelling focussed on this issue. In any case, noise due to non HGV traffic is not significant in comparison to noise from HGVs. This is borne out by the predicted increase in noise using the CRTN calculation which shows a much smaller increase in noise than the calculation using the SELs with the road hump.</p>		
<p>Agreed that early morning and late evening cable movements would be considered in the assessment given that Highways desires off peak travel time. Are full drum cables abnormal indivisible loads?</p> <p>Notwithstanding mitigation plans escorted drums HGV speed could be reduced to 20mph if desired whilst passing the crossing cottage.</p>	<p>The Applicant has confirmed to NCC, as highways authority, and BDC, that abnormal loads may move to and from the main construction compound during the core working hours, or outside of the core working hours. In response to concerns raised by BDC regarding the potential for amenity impacts associated with night-time movements of abnormal loads, the Applicant has provided further details in the submission at Deadline 7 (Appendix 24). As noted in ISH9 on 08 March 2019, the Applicant has assessed the noise levels associated with abnormal load deliveries in the scenarios of 50% and 100% of the cable drum deliveries within the night-time hours (23:00 – 07:00) to ensure a maximum design scenario has been assessed. Noise levels associated with day-time deliveries outside of the core working hours (e.g. early evening) are included within the assessment presented in Appendix 23 to Deadline 6 Submission: Construction Traffic Noise and Vibration Assessment at The Old Railway Gatehouse (REP6-037).</p> <p>It is noted that Hornsea Three has agreed to add a commitment within the Outline CTMP which recognises that in some locations, additional management measures may apply to the movement of abnormal loads in close proximity</p>	<p>BDC will review the submissions made at Deadline 7 in due course.</p> <p>Noted</p>	<p>The Applicant has engaged with BDC following the submissions made at Deadline 7, providing clarification where needed, and understands that this point is now agreed.</p> <p>N/A</p>

Comments made by Broadland District Council	Hornsea Project Three Comments/Response	Subsequent comments made by BDC	Hornsea Three Comments/Response
	to sensitive receptors. The exact nature of the measures as well as the locations and timings for when they will apply will be agreed with the highway authority and relevant planning authority environmental health officer post-consent as part of the detailed CTMP. This could include further restrictions on speed, lighting etc.		
To summarise: The applicant has used the predictive method (CRTN) and noted its shortcomings. It has also measured results to derive an SEL to calculate an LAEQ 16h. My view is that the measurement method is probably more accurate. I also think that it's possible that the assumptions made in paras 5.16, 5.17 and 5.18 may not be correct and that is the reason for most of my questions.	The Applicant has responded on a point by point basis above. It is considered by the Applicant that the assessment presented at Deadline 6 (REP6-037) and the further clarifications provided at Deadline 7 (Appendix 24) provide an robust assessment of the potential for noise impacts at the Old Railway Gatehouse and have identified appropriate mitigation measures to minimise impacts such that they are not considered significant in EIA terms.	BDC will respond once D7 Appendix 24 has been seen	The Applicant has engaged with BDC following the submissions made at Deadline 7, providing clarification where needed, and understands that this point is now agreed.

Comments made by Broadland District Council	Hornsea Project Three Comments/Response	Subsequent comments made by BDC	Hornsea Three Comments/Response
<p><i>Cawston</i></p> <p>Await noise and vibration reports plus traffic movement document not yet received from Paul. Paul has appraised school site and feels it is not necessary to restrict movements at drop off and pickup. So far as SCC goes I feel that we are still in discussion about these issues.</p>	<p>Hornsea Three continues to consider potential noise and vibration impacts within Cawston Village, as this will be affected by the refinements in the Hornsea Three HGV traffic flows, following reduction of the haul road depth . Although the refinement in HGV movements will not have a bearing on the conclusions of the ES or the TA (which continue to represent the maximum design scenario), the revised traffic flows will be used to inform the refinement of the Outline CTMP, and identification of any associated noise and vibration mitigation (if deemed necessary).</p> <p>We have developed a proposed set of management measures which has been subject to consultation with Cawston Parish Council working group, Broadland District Council and Norfolk County Council (submitted as part of REP6-016). We are currently in the process of responding to this feedback and will provide a revised outline scheme at Deadline 7 and share with BDC.</p> <p>Baseline noise and vibration surveys have been undertaken within Cawston Village, as well as an assessment of potential impacts from the traffic movements associated with Hornsea Three. This assessment has concluded that there would be no significant noise and vibration impacts on the residential properties of Cawston Village as a result of Hornsea Three. These findings will be submitted at Deadline 7 and shared with BDC.</p> <p>Hornsea Three continues to engage with Norfolk Vanguard to reach a shared common point of agreement on this cumulative link in order to avoid significant noise and vibration effects on residential receptors. We are committed to continuing this engagement and is confident that a reasonable solution will be reached.</p>	<p>Noted, BDC will review the submissions made at Deadline 7.</p>	<p>The Applicant has engaged with BDC following the submissions made at Deadline 7, providing clarification where needed, and understands that this point is now agreed.</p>
<p><i>Other:</i></p>	<p>It is estimated that activities at the main construction compound associated with Hornsea Three would occur within</p>	<p>Noted</p>	<p>N/A</p>

Comments made by Broadland District Council	Hornsea Project Three Comments/Response	Subsequent comments made by BDC	Hornsea Three Comments/Response
Duration of the use of the main construction compound	<p>an eight-year construction window. However, the active use (i.e. delivery of cable drums, regular movements by HGVs etc.) of the main construction compound would be limited to up to 30 months, excluding mobilisation and demobilisation. This could be across a single construction phase, or two construction phases. Should Hornsea Three be delivered across two phases, the main construction compound would be demobilised and not in active use during the 'gap', unless otherwise agreed with the local planning authority (as set in Section 3.8 of Volume 1, Chapter 3: Project Description of the Environmental Statement).</p>		