

# Norfolk Boreas Offshore Wind Farm Applicant's Comments on Deadline 6 Submissions and Other Submissions

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Author: Royal HaskoningDHV

*Photo: Ormonde Offshore Wind Farm*

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## Glossary of Acronyms

AEoI	Adverse Effect on Integrity
DCO	Development Consent Order
dDCO	Draft Development Consent Order
DML	Deemed Marine Licences
dDML	Draft Deemed Marine Licence
EIA	Environmental Impact Assessment
ES	Environmental Statement
ExA	Examining Authority
HHW	Haisborough, Hammond and Winterton
HRA	Habitats Regulations Assessment
IPMP	In Principle Monitoring Plan
Kj	Kilojoules
MMO	Marine Management Organisation
MoU	Memorandum of Understanding
NE	Natural England
NSIP	Nationally Significant Infrastructure Project
OASIS	Online Access to the Index of Archaeological Investigations
OMP	Operations and Maintenance Plan
OOOMP	Outline Offshore Operations and Maintenance Plan
OWF	Offshore Wind Farm
SAC	Special Area of Conservation
SIP	Site Integrity Plan
SNCB	Statutory National Conservation Bodies
SoCG	Statement of Common Ground
SoS	Secretary of State
UK	United Kingdom
UXO	Unexploded Ordnance
WSI	Written Scheme of Investigation

## 1 Applicant's Comments on Deadline 6 Submissions

1. This section contains the Applicant's comments on submissions by Interested Parties at Deadline 6 of the Norfolk Boreas Examination.
2. Comments on the Offshore Ornithology submissions at Deadline 6 are provided in a separate document; 'Offshore Ornithology Update Response to Natural England's submission EV9-003 and further comments on REP4-040' [ExA.AS-7.D7.V1] submitted at Deadline 7.

## 1.1 Breckland Council REP6-041

Summary of Submission	Applicant's Comments
<b>Response to Further Written Questions</b>	
<p><u>(Q2.5.02)</u> - Outstanding matters on the dDCO: The Applicant has provided responses to matters raised by the relevant planning authorities and other post-consent approval bodies at Deadlines 2, 3 and 4. Aside from the matters questioned below, set out any outstanding concerns with the dDCO submitted at Deadline 4 [REP4-004].</p> <p><u>In response</u> - Based on DCO (Version 4 – Jan 2020) and a review of Schedule 1 Part 3 (Requirements) relating to onshore matters, Breckland Council considers the following outstanding matters need to be addressed: <i>Provision of Landscaping – Regulation 18 (2)</i>. Breckland Council considers that the scheme should not rule out the possibility of bunding around the Station at Necton, details of which, if it is considered necessary and appropriate, will be agreed between the District Council and the developer at the appropriate stage.</p>	<p>The Applicant notes this response. The Applicant refers to the response to Q2.9.6.5 [REP5-014] which states that; The option to use some subtle earth bunding in appropriate areas would be considered, where a slight rise in ground levels could contribute to the mitigation afforded by the proposed planting. As a worst-case no bunding was assessed in the ES however the dDCO does not preclude the use of subtle earth bunding and the OLEMS Sections 6.5.1 Scenario 1 and 6.5.2 Scenario 2 [REP5-022] does refer to potential to include a subtle earthwork bund (1.5m to 2m) on the western side' of the onshore project substation footprint.</p> <p>The Applicant will work with the District Council to further discuss landscaping proposals at the appropriate stage.</p>
<p><u>Q2.5.1.1</u> – The Applicant has stated that the “ES is a record of what is assessed, not what is permitted and therefore does not require any updates.” [REP4-009, No.1]. 1. Are consenting authorities' content with this position? 3. Consenting authorities to comment if they think this clarification is necessary.</p> <p><u>In response – 1.</u> BDC accepts the point that the Environmental Statement is produced at a moment in time. It is understood that this is based on a worst case scenario. This would only be changed where there is a material change to the base conditions or the project specifications.</p> <p>3: An ES can only really assess the position at the time of the submission and make an assessment of impacts of the scheme based upon the information available at that time. If that baseline or specification materially changes then there may well be a requirement for the assessment to be updated. That initially will be a view to be taken by the decision maker and, it is assumed, by the authorities ultimately discharging post-consent conditions and requirements.</p>	<p>The Applicant notes this response.</p>

Summary of Submission	Applicant's Comments
<p><u>Q2.5.1.5 - Council Article 2: Interpretation: Onshore 'phase' and 'stage':</u> 1. The ExA considers that the explanation given for onshore phase by the Applicant [REP4-019] adds to clarity. Would it be helpful for a brief description to be provided in a secured document, but not the DCO itself – e.g. the OCoCP? 4. Are the post-consent discharging local authorities content with the way in which all matters pertaining to one stage (potentially district-wide except for substation and landfall) and all requirements (Schedule 16 1.(1)) would be submitted and need approval within the specified 8 week time period prior to works being able to be commenced? 5. Do parties consider that further clarification under R15, that enabled the contractor to submit proposals for partial approvals of stages be helpful?</p> <p><u>In response -1:</u> BDC would agree with the proposal to secure a brief description of the matters set out at REP4-019 within the OCoCP. 4: BDC would like to see schemes agreed with each of the post-consent discharging authorities to agree timescales for all individual discharges having regard to the level of complexity for each of the separate discharge matters. It is considered that a one-stage approval (if that means a blanket scheme covering all the discharge authorities) would not be helpful. 5: Whilst in principle BDC would have no objection to this, these partial approvals should not be seen in isolation and a disjointed approach should be avoided.</p>	<p>The Applicant notes the responses made. The OCoCP [REP5-010] submitted at Deadline 5 has been updated to include the description of the phases and stages as detailed in the Clarification Note.</p> <p>The Applicant considers that the time periods for discharge are proportionate and needed in order to unlock nationally significant renewable energy infrastructure projects. However, the Applicant also notes that Schedule 16 of the dDCO [REP5-004] provides an element of flexibility for both parties to agree an extension of time if necessary (paragraph 1(3)(c)).</p>
<p><u>Q2.5.1.9 - Article 37: Certification of Plans -</u> The ExA notes the Interested Parties Response in its Written Summary of Oral Case submitted at the DCO ISH [REP1-041] to its point regarding the need for ensuring the final DCO relates to updated documents. The Guide [REP3-002] as mentioned, captures version updates on a deadline by deadline basis, which includes many documents which would not be certified. The ExA considers there is a need to capture the versions of the documents and plans to be certified, in a document which is itself certified, so that future users (such as post consenting discharging authorities) can readily ensure that they are using the right version of a document. [REP1041] also states that the Applicant will submit an update to the Note on Requirements and Conditions in the Development Consent Order [APP-022] at the end of the Examination to capture the latest (and final draft) version of each relevant plan or document. Including this as the overall reference could also benefit from the</p>	<p>Noted. The Applicant has also added a further Schedule to the dDCO at Schedule 18 which includes a table for certified documents with columns for (1) the document, (2) the document reference number, (3) the final version number, and (4) the stage or deadline in which the document, submitted at Deadline 7.</p>



Summary of Submission	Applicant's Comments
<p>diagrammatic representations of the relationships between plans. 1. Clarity is requested about the level of detail the Applicant is considering in its updating of [APP-022]. The ExA considers that all documents or plans would need their versions citing. 2. The Applicant to set out how it proposes to ensure that all documents which were updated could be captured in its updating process and to comment on the desirability of this document [APP022] being certified. 3. Following on from the Applicant's position regarding the fixed point in time assessment provided by the ES and its position that the "relevant parameters consented are set out in the DCO/DML itself, and that is what should be relied upon post consent" [REP4-009, No.1], the ExA considers that the Schedule of Mitigation, which provides the link between the ES and the DCO/DML should be certified. The Applicant is invited to comment. 4. Views are requested from discharging authorities on the points above.</p> <p><u>In response</u> - 4: The document numbering used by PINs for this and other NSIP projects is accepted. It will fall to each discharging authority to utilise an appropriate document managing system for post-consent discharges. The applicant, at submission stage, will need to ensure that all relevant documents are referenced and accessible for the relevant authority and other interested parties as part of each submission.</p>	
<p><u>Q2.5.7.1</u> - During the Onshore ISH [EV6-005], the potential use of Planning Performance Agreements (PPA) was discussed. The Applicant asserted that a smooth discharge process is necessary for fastmoving projects such as this and therefore properly resourced approval mechanisms are in its best interests. The Applicant also cited discharge of requirements on a consistent basis across authorities is important and, in this regard a possible approach would be to appoint a co-ordinator.</p> <p><u>In response</u> - Breckland Council would support the idea of PPAs' being put in place with each individual authority to enable appropriate and sufficient resource to be available to deal with potentially complex post-consent discharge applications. Whilst Breckland Council can see some merit in a co-ordinating body for the discharge of post-consent matters, e.g. it would allow for a single point of contact, each authority will have its own costs and requirements for discharging applications and therefore PPAs' should be</p>	<p>The Applicant considers that a single coordinator would act as a point of liaison and conduit between the Applicant's project team and the Relevant Planning Authority (RPA) in order to co-ordinate the discharge of Requirements. The RPAs would need to be in agreement with the technical content of the plan for discharge. It would not therefore be a case of the single co-ordinator discharging plans without authority. The Applicant considers that a single co-ordinator is likely to be the most efficient and practical way to discharge plans across RPAs. Notwithstanding this, the Applicant is open to discussing alternative approaches including individual PPAs for each respective discharging authority. A meeting was held with the RPAs on the 12<sup>th</sup> March 2020 to discuss this and the Applicant will continue to engage with the RPAs on this matter.</p>



Summary of Submission	Applicant's Comments
<p>agreed with each individual authority. There are due to be discussions between the applicant and the relevant authorities on this matter.</p>	
<p><u>Q2.12.1.3 Temporary facilities:</u> The ExA is not persuaded by the Interested Parties Response to Q5.2.2 [REP2-021] and [REP2- 030] in the matter of restricting heights of temporary facilities in the dDCO, although it acknowledges that each location would be different in terms of sensitivity of receptors, and micro-siting within the mobilisation zones would take place at a later date. 1. If the worst-case scenario assessed is that the height of welfare facilities and storage units would be 3m [REP2-030, para 11], where is this secured? Why would this not be included in the dDCO? The ExA is not convinced that the Best Practical Means in the OCoCP [REP1-019, section 9.1] gives enough certainty that adverse construction effects on visual and other amenity would be addressed in an holistic way for sensitive receptors in proximity to mobilisation areas. 2. The Applicant and local planning authorities to comment on whether there should be a process set out and secured in the dDCO, which post consent, would identify those construction areas where consideration needs to be given to adverse effects on neighbouring communities (not just for noise and vibration). 3. If so, where would this be best located, and should it set out layout/ mitigation principles for specific compounds which go further than the mitigation currently set out in the OCoCP [REP1019]?</p> <p><u>In response</u> - In relation to Temporary Construction Facilities, Breckland Council considers that this should be a post-consent requirement for each relevant authority to agree having regard to specific locational characteristics. Any one size fits all approach would not be appropriate. It may not be appropriate to define overly prescriptive parameters and mitigation which may be overly onerous for some sites and not onerous enough for others.</p>	<p>As detailed in the OCoCP [REP1-018] the final CoCP will include a site layout showing the location of mobilisation areas, trenchless crossing technique (e.g. HDD) compounds, onshore project substation temporary works area and National Grid substation extension temporary works area and the main features of these sites. As such these will be subject to a review and approval process by the relevant planning authority as part of the discharge of Requirement 20. Further information on the process for ensuring measures are in place to minimise any effects on neighbouring communities relating to these elements has been included in Section 3.2 of the OCoCP. The OCoCP sets out the principles which will be adopted to minimise effect's however site-specific control measures will be identified when further details of the construction activities are available post-consent to ensure the most appropriate mitigation is identified.</p>
<p><u>Q2.12.2.4 - Noise levels:</u> Respond to the concerns raised in [REP4-052] regarding the noise levels and compliance with the 32dB(Z) 100hz limit agreed by the Applicant with Breckland Council.</p> <p><u>In response</u> - Breckland Council notes the comments made in REP4-052 in relation to noise. It has agreed within the Statement of Common Ground a position in relation to</p>	<p>The Applicant notes this response. The details of the results of noise modelling and mitigation proposed at the substation site are set out in ES Chapter 25 Noise and Vibration [APP-238]. Examples of noise mitigation (acoustic enclosure/shielding) are also presented within the modelled scenarios. These show that the onshore project substation under Scenario 1 with the Norfolk Vanguard onshore substation operating with additional</p>

Summary of Submission	Applicant's Comments
<p>these matters and does not demur from that. It would ask the applicant to work with the writer of the representation to seek a mutually acceptable position.</p>	<p>noise mitigation, will fall within the 32dC(Z) 100hz condition limit, and will result in no impact at identified receptor locations, including SSR2 Ivy Todd Farm (the IP whom submitted REP4-052), the location of which is shown in ES Figure 25.2 [APP-470]. Compliance with this limit is secured via the draft DCO under Requirement 27. The Applicant has provided clarifications to the points raised by REP4-052 in the Applicant's comments on Deadline 4 submission and additional submissions (REP5-051).</p>
<p>Q2.12.2.5 - Are LPAs confident that the enhanced mitigation measures identified by the ES Chapter 25 [APP-238] would achieve the noise reductions identified in Tables 25.34, 25.36, 25.37 and 25.39 of the ES?</p> <p><u>In response</u> - Breckland Council has not had an opportunity to consider this issue but refers to the response to Q2.12.2.4</p>	<p>Please refer to the Applicant's comments in response to Q2.12.2.4.</p>
<p>Q2.15.0.1 Proposed disapplication of secondary consent, in relation to drainage: The Applicant provides an explanation in [AS-024] table 15 item 5 for the proposed disapplication under dDCO Article 7 (3) of secondary/ additional consents, with reference to representations by Water Management Alliance [RR-104] and by Norfolk CC [RR037]. Are parties content? If not, why not?</p> <p><u>In response</u> - Breckland Council would support the position that the parties normally involved in a secondary consent process should be part of the discharge process. There should be clarity around the relevant bodies and how they will be involved in PPAs' and each discharging authority's consultation process with them when discharging post-consent applications.</p>	<p>All parties who would be involved in the secondary consenting associated with watercourse crossings are captured and consulted under Requirement 25, these are the Environment Agency, Norfolk County Council as Lead Flood Authority and Internal Drainage Boards (captured under relevant drainage authorities).</p>
<p><u>Q2.16.0.2</u> - SoCG with Breckland Council: The Applicant and Breckland Council are requested to update their SoCG to reflect the adoption of its Local Plan during the examination in 2019.</p>	<p>The Breckland Local Plan was adopted on 28<sup>th</sup> November 2019, and the final correspondence between the Applicant and Breckland regarding the Statement of Common Ground was on the 4<sup>th</sup> December 2019. Therefore the Applicant has included, discussed and resolved any areas of concern with Breckland Council and this is already reflected in the SoCG submitted at Deadline 2.</p>

Summary of Submission	Applicant's Comments
<p><u>In response</u> - Both the Statement of Common Ground and the Local Impact Statement submitted by Breckland Council on Deadline Day 2 reflect the adoption of the Breckland Local Plan on 28th November 2019.</p>	

## 1.2 Cawston Parish Council REP6-042

Summary of Submission	Applicant's Comments
<p><b>Outline Traffic Management Plan (OTMP)</b></p>	
<p>1 - We note from para 88 Table 3.4 that the Applicant has now committed to restricting traffic operations to 0900 to 1800 Monday – Friday, with a break from 1500 – 1600. However, we maintain our position that the centre of Cawston village is unsuitable for such traffic at any time.</p> <p>2 - We have also been unable to get a confirmation from Hornsea 3 that they would adhere to these times. Nor have they confirmed that they will not be using abnormal loads to deliver cable, as was stated to us by the Applicant in the 12th February meeting.</p> <p>3 - Section 5.6 of the OTMP outlines a Speed Monitoring Regime, with surveys at one month, three months and then six monthly. It states:- <i>“167. If it is found that additional mitigation measures are necessary to reduce speeds through Cawston, these will be proposed and agreed with the relevant stakeholders.”</i> In our view, this is too little, too late. Given the history of the HIS it is difficult to envisage what new and effective mitigation measures might be discovered that have not already been proposed and rejected. Shutting the stable door after the horse has bolted is never a good approach.</p> <p>4 - Turning to the subject of 20mph speed limits, which together with a few signs seem to be the Applicants only remaining attempt at addressing pedestrian safety, we asked a number of road safety charities for some advice on their effectiveness. They all gave similar responses. As an example, Neil Greig, Policy and Research Director of IAM Roadsmart, gave us this information (quoted with permission):-</p>	<p>1. Table 3.4 of the OTMP [Rrep5-025] sets out that HGV restriction will apply between 6pm to 9am and 3pm to 4pm (Monday to Friday).</p> <p>In their role as Local Highway Authority, Norfolk County Council (NCC) have classified the High Street through Cawston as the B1145, a ‘Main Distributor’. The Main Distributor category indicates a route linking Primary Distributors (i.e. linking significant settlements to A roads serving the County) and are not subject to any restrictions on Heavy Goods Vehicles (HGV).</p> <p>2. As confirmed in the Revised Cawston Highway Intervention Scheme Technical Note, Hornsea Project Three are content for Norfolk Boreas to take the design lead with respect to the HIS. The Applicant has continued to liaise with HP3 during the scheme development and the latest scheme detail and Road Safety Audit have been shared. It is anticipated that latest position will be included in the SoCG with HP3 to be submitted at Deadline 8.</p> <p>3. Following discussions with Norfolk County Council, the Applicant has agreed to increase the frequency of monitoring to ensure driver compliance. Following implementation of the Highway Intervention Scheme monitoring will be at a daily frequency only reducing that frequency after three months or when there is clear evidence that there are no significant compliance issues (whichever is the latter).</p> <p>4. The Road Traffic Regulation Act (Amendment) Order 1999, made two distinct types of 20mph speed limit possible:</p>

Summary of Submission	Applicant's Comments
<p><i>The evidence on the effectiveness of 20mph limits is mixed. Sign only limits tend to have a limited effect on traffic speed and it is only when physical features (eg road humps) are included that you see a high level of compliance. I believe the average non-compliance with 20mph limits is 87% (<a href="https://www.gov.uk/government/collections/speeds-statistics">https://www.gov.uk/government/collections/speeds-statistics</a>) so they are widely ignored!</i></p> <p><i>The DfT's own report questions their success rate - <a href="https://www.gov.uk/government/publications/20-mph-speed-limits-on-roads">https://www.gov.uk/government/publications/20-mph-speed-limits-on-roads</a></i></p> <p><i>"The evidence available to date shows no significant change in the short term in collisions and casualties, in the majority of the case studies"</i></p> <p><i>This report also states that "The journey speed analysis shows that the median speed has fallen by 0.7mph in residential areas and 0.9mph in city centre areas. Faster drivers have reduced their speed more, with the 85th percentile speed2 falling by -1.1mph in residential areas and by -1.6mph in city centre areas, based on journey speed data. "</i></p> <p><i>This suggest that speeds will not fall to anywhere near 20mph but there will be a slightly larger reduction at the high end e.g. 29mph drivers will go a few mph slower.</i></p> <p>This suggests that the Applicant's reliance on a 20mph speed limit as an effective mitigation is misplaced.</p>	<ul style="list-style-type: none"> <li>• 20mph limits, which consist of just a speed limit change to 20mph which is indicated by the speed limit (and repeater) signs, and</li> <li>• 20mph zones, which were designed to be "self-enforcing" due to the traffic calming measures that were introduced along with the change in the speed limit.</li> </ul> <p>The HIS creates a 20mph zone, using formal parking controls and existing carriageway narrowing to create a series of chicanes to self-enforce 20mph compliance.</p> <p>Cawston Parish Council's reference to 20mph speed limits and the DfT publication "20mph speed limits on roads" relates to signed only speed limits, typically introduced on low speed roads, with free flowing traffic and no traffic calming. The study concluded that the majority of sites had relatively low baseline speeds so the potential to lower them further was diminished.</p> <p>Pioneering Dutch 20mph Zone research (pre- UK legislation) concluded speed humps and narrowing the road almost always reduced vehicle speeds to below 30km/h and accident reductions of 80-85% were returned.</p> <p>In recent years, the Royal Society for the Prevention of Accidents has issued guidance<sup>1</sup> to transport professionals which draws together evidence from numerous studies into the effectiveness of 20mph Zones including:</p> <ul style="list-style-type: none"> <li>• Transport Research Laboratory;</li> <li>• Local Transport Today (trade journal);</li> <li>• British Medical Journal; and</li> <li>• Various academics (e.g. Webster et al).</li> </ul> <p>The guidance concludes:</p>

<sup>1</sup> Road Safety factsheet: 20mph Zones and Speed Limits, Royal Society Protection of Accidents, 2017.

Summary of Submission	Applicant's Comments
	<p><i>“Evidence shows that 20mph zones are an effective way of preventing injuries on the road.”</i></p> <p>The guidance concludes:</p> <p><i>“RoSPA strongly supports the use of 20mph zones as they are an effective means of reducing road crashes and casualties. They are very effective at protecting our most vulnerable road users, including children, pedestrians and cyclists, and significantly decrease the risk of being injured in a collision.”</i></p> <p>The HIS design is in keeping with the UK legislation and guidance for 20mph zones and is therefore intended to be a self-enforcing scheme. However, if the monitoring regime revealed the scheme was not as effective as anticipated additional enforcement measures could be introduced to achieve compliance for the Project’s traffic.</p> <p>Further mitigation would be determined in accordance with any compliance issue identified. This could be additional signing, camera enforcement, or amendments to delivery schedules</p>
<p><b>Cumulative Traffic Effects in Cawston</b></p>	
<p>Our Deadline 5 submission expressed our doubts about the revised Highway Intervention Scheme. Now that we have had the chance to see the Road Safety Audit we would add the following:-</p> <p>a) The RSA confirms our points about dangers arising from sending this traffic through the centre of the village, due to the narrow road and pavements.</p> <p>b) The brief given to the auditors only includes Boreas traffic numbers. We suggest that the cumulative numbers of H3 and Vanguard/Boreas together might well have caused the auditors to be more emphatic in their conclusions.</p>	<p>a) The road safety audit process is to identify aspects of engineering interventions that could give rise to road safety problems and to suggest modifications that could improve road safety for all users. In doing so, the RSA makes recommendations to address any problems identified.</p> <p>The Applicant has addressed all the recommendations made in the RSA in the revised HIS designs submitted at Deadline 5 [REP5-027].</p> <p>NCC indicated during a meeting on the 16<sup>th</sup> March 2020 that no further amendments are required to the HIS and there are no remaining technical</p>

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<p>c) In their comments on the RSA the Applicant sets out a summarised baseline position in Appendix C. We have asked the Applicant for more details but had received no response at the time of writing.</p> <p>d) At a meeting last year with Norfolk Vanguard, they mentioned that they understood that Hornsea 3 defined all vehicles above 3.5 tonnes as "HGV" in their figures.</p> <p>e) If this is the case, then surely it is not consistent and reasonable to compare these numbers directly with the additional traffic, all of which will be larger vehicles.</p> <p>f) Para 26 Table 1 in the RSA commentary quotes different (lower) HGV numbers from those previously reported in REP3-003. We also await the Applicant's comments on this.</p> <p>g) The latest figures from the Applicant will bring one additional (large) HGV every two minutes, apparently with metronomic timing on a "just in time" schedule.</p> <p>h) Walking at 4km per hour (2.5 mph) a pedestrian covers 133 metres in two minutes. This means that every pedestrian can expect to encounter at least one of the Applicant's HGVs as they walk through the village.</p> <p>i) The RSA states "However, even with these points in mind, the Audit Team still perceive there to be a risk to pedestrians due to the narrowness of the footway and the proximity that HGVs will be to pedestrians."</p> <p>j) Cawston Parish Council suggests that historical collision figures have no value in determining the additional risk of collision from the applicant's construction traffic in our village. The nature of collision risk in Cawston is entirely changed by routing large volumes of HGV and other traffic on the B1145 through the village.</p> <p>The RSA auditors state that "Without full collision data the Audit Team cannot ascertain the causation factors for these collisions. When considering the use of collision data".</p>	<p>objections. Accordingly, NCC also indicated they will be completing the RSA log to finalise the scheme.</p> <p>b) The brief submitted to the independent Road Safety Auditors included the Technical Note: Revised Cawston Highway Intervention [REP4- 016] which provided the background and supplementary information on the scheme and detailed (para. 2) a cumulative HGV figure of 239 movements (which includes HP3 with Norfolk Boreas Scenario 2 or Norfolk Vanguard).</p> <p>NCC have confirmed the RSA is valid and submitted the document to the Development Control panel for review.</p> <p>The Applicant has addressed all the recommendations made in the RSA. Since a meeting held between the Applicant and NCC on the 16<sup>th</sup> March 2020, it is the Applicants understanding that no further amendments are required to the HIS and there are no remaining technical objections. Accordingly, NCC also indicated they will be completing the RSA log to finalise the scheme.</p> <p>c) The Applicant responded to Cawston Parish Council's additional queries on the 10<sup>th</sup> March 2020. The responses are provided below:</p> <p><i>CPC Query 1: Table C1 -We have searched the H3 document but can't find the specific numbers you quote. Could you point us to them, or how they were arrived at?</i></p> <p><u>Applicant's Response to CPC 10<sup>th</sup> March 2020</u>  <i>Table C1 is a direct replica of Table 2.1: Summary of Traffic Flows along B1145 through Cawston contained within the Hornsea Project Three (HP3) Document High Street Cawston –Highway Intervention Scheme – March 2019.</i></p> <p><i>The data in Table 2.1 (Table C1) has been extrapolated from the RAW ATC Traffic counts provided in Annex E from the HP3, Appendix 26 to</i></p>

Summary of Submission	Applicant's Comments
<p>The applicant asserts <i>“Notwithstanding, it is evidenced by the collision (accident) records that the limitations of pedestrian amenity in Cawston are not leading to an inherent pedestrian road safety risk.”</i></p> <p>The applicant appears to disregard Cawston residents’ perception of risk as an impact of their proposed operations. Perception of risk will have a direct impact upon the quality of life of Cawston’s residents for many years under the applicant’s and other developers’ proposals.</p> <p>k) On pedestrian risk, the applicant concludes <i>“Following the evaluation of the key effects that are likely to influence pedestrian risk it is concluded that the likelihood and severity are low and therefore the probability of the perceived pedestrian risk manifesting into an incident is low.”</i></p> <p>In the course of three National Infrastructure Planning Inquiries Cawston Parish Council has sought to keep local residents informed about the proposals and evidence presented, in a form more clearly understood by lay-people. Summarising the applicant’s conclusions on pedestrian risk for Cawston’s residents a simplification might be:</p> <p><i>“If you are need to walk along the narrow footway in the centre of Cawston, you might be worried about being hurt by a passing truck, and its unaccountedfor wing mirrors. You shouldn’t worry because if you do get hit by a truck you will probably experience slight or serious injuries rather than being killed by it because the truck will probably be travelling at 20mph.”</i></p> <p><b>Cawston Parish Council’s assessment is that pedestrians’ perception – and their real experience - will be one of <u>extreme danger</u>.</b> Even if they avoid physical injury, quality of life and mental health will suffer.</p> <p>The geometry of Cawston High Street has remained unchanged for 250 years; if it was ever a “main distributor route”, that would have been for horse drawn traffic. It is time for the applicant to acknowledge this reality and to divert construction traffic away from the B1145 in Cawston. No more time should be wasted trying to “prove” that the next version of the applicant’s ever changing Highway Intervention Scheme could</p>	<p><i>Construction Traffic Noise and Vibration Assessment for Cawston Village submitted at Norfolk Boreas Deadline 3 [REP3-006].</i></p> <p><i>To be able to derive the traffic numbers presented in Table 2.1 (Table C1) the following methodology has been undertaken:</i></p> <p><i>AM Peak (0800-0900) –The average 08:00-09:00 weekday (5 days) Eastbound traffic has been added to the average 08:00-09:00 weekday (5 days) Westbound traffic.</i></p> <p><i>PM Peak (1700-1800) –The average 17:00-18:00 weekday (5 days) Eastbound traffic has been added to the average 17:00-18:00 weekday (5 days) Westbound traffic.</i></p> <p><i>12-Hour Daily (07:00-19:00) –The average 07:00-19:00 daily (7 days) Eastbound traffic has been added to the average 07:00-19:00 (7 days) Westbound traffic.</i></p> <p><i>24-Hour Daily (00:00 –00:00) –The average 00:00-00:00 (7days) Eastbound traffic has been added to the average sum of the 00:00-00:00 (7 days) Westbound traffic.</i></p> <p>d) HGVs are defined by HP3 using the UK approved ‘ARX Classification’ (see Appendix 1). This system classifies vehicles according to the axle spacing, with HGVs ranging from Class 4 (Two axel truck or bus) to Class 10 (Six axle articulated vehicle or rigid body vehicle with trailer).</p> <p>e) The Environmental Statement, Chapter 24, <i>Traffic and Transport</i> [APP-237] uses the <i>Guidelines for the Environmental Assessment of Road Traffic, IEA, 1993</i> as the principal UK guidance for assessing the impacts of the Project’s traffic. The Guidelines require the assessor to determine the HGV component (%) of traffic flows to determine potential impacts. There is no recognised research or guidelines to indicate that HGV type should be distinguished to further determine impact magnitude.</p> <p>f) The Applicant responded to Cawston Parish Council's additional queries on the 10<sup>th</sup> March 2020. The responses are provided below:</p>



Summary of Submission	Applicant's Comments
<p>produce effective mitigation for the acknowledged hazards to people and property in the centre of our village.</p>	<p><i>CPC Query 2: Table C1 - can you clarify what vehicles are defined as "HGV" on the H3 schedule?</i></p> <p><i>Previous responses (REP3-003) have a table of HGV forecasts:-</i></p> <p><i>1 week at 122</i></p> <p><i>22 weeks at 95</i></p> <p><i>13 weeks at 44</i></p> <p><i>23 weeks at 8</i></p> <p><i>As far as I was aware, that is the current position. Total 2958.</i></p> <p><i>Para 26 Table 1 in the RSA commentary quotes</i></p> <p><i>1 week at 112</i></p> <p><i>2 weeks at 96</i></p> <p><i>27 weeks at 66</i></p> <p><i>18 weeks at 9</i></p> <p><i>Total 2248, a significant difference</i></p> <p><i><u>Applicant's Response to Cawston Parish Council 10<sup>th</sup> March 2020</u></i></p> <p><i>HGVs are defined using the ARX Classification (refer to attached Appendix 1). The Vehicle Classes defined as HGVs in the HP3 ATC Surveys include Class 4 to 10 inclusive. Classes 11 and 12 do not exist as typical HGVs on the UK roads and thus are not included in the ATC surveys.</i></p> <p><i>Norfolk Vanguard capped the demand at 112 daily HGV movements which when combined with HP3 (127) = 239 daily HGV movements.</i></p> <p><i>The same cap was applied to Norfolk Boreas scenario 2 (the worst-case demand that informed the Road Safety Audit), so there is no difference in Peak Flows or Cumulative HGV movements.</i></p> <p><i>With regards to the different Total HGV numbers detailed in the two documents, the following provides the reasoning;</i></p>

Summary of Submission	Applicant's Comments
	<ul style="list-style-type: none"> <li>• <i>The Table provided in (REP3-003) is the total construction programme for the Norfolk Vanguard duct installation (which includes ducting for both the Norfolk Vanguard and Norfolk Boreas projects). These numbers were used as a proxy for Norfolk Boreas Scenario 2 flows, as described in the accompanying text.</i></li> <li>• <i>Table 1 in the Road Safety Audit commentary provides the actual updated Norfolk Bores Scenario 2 (duct installation) construction programme. These Scenario 2 numbers detail a reduction of Total HGV numbers compared to Norfolk Vanguard, as Norfolk Boreas Scenario 2 is only undertaking ducting for one project, whereas Norfolk Vanguard undertakes ducting for two projects.</i></li> </ul> <p>g) Correct, the Outline Traffic Management Plan (V3) [REP5-025] commits to a delivery booking system to maintain a daily profile of deliveries and to ensure that deliveries are planned and forecast.</p> <p>h) and i) - Revised Cawston Highway Intervention Scheme Road Safety Audit Decision Log [REP5-055,Section 3.8] addresses the issue of perceived risk in the RSA Designer's response. As previously stated the Applicant has addressed all the recommendations made in the RSA in the revised HIS drawings submitted at Deadline 5 [REP5-027]. At a meeting held on the 16<sup>th</sup> March 2010, NCC indicated that no further amendments are required to the HIS and there are no remaining technical objections. Accordingly, NCC also indicated they will be completing the RSA log to finalise the scheme.</p> <p>j) It is recognised Road Safety Practice in the UK to examine road safety data to determine if there is an inherent safety problem that could be exacerbated by a highway scheme proposal. The road safety auditors were provided with open source 'Crashmap' data. This provides adequate information for the auditors to make this determination. The Designers response sourced Police information (including causation factors) as a secondary check to confirm there was not an inherent road safety problem within the HIS study area.</p>

Summary of Submission	Applicant's Comments
	k) The Applicant refers to response h) and i) above.

### 1.3 North Norfolk District Council REP6-043

Summary of Submission	Applicant's Comments
<b>Comments on Responses to Further Written Questions</b>	
<p><u>Q2.5.3.6 (Schedule 1 Part 3: Requirement 19)</u></p> <p><u>Comment -</u></p> <p>NNDC notes the position of the applicant in respect of Requirement 19 set out across pages 50 and 51 of the Applicant's Responses to the Examining Authority's Further Written Questions [REP5-045].</p> <p>NNDC has since clarified with the applicant via teleconference on 04 March 2020 that any commitment in relation to replacement planting would include replacement of all trees, hedgerows and shrubs in the event of failure within the prescribed replacement planting period. This is a welcome and important clarification so as to ensure that <u>all</u> planting is subject to appropriate protection in the event of plant failure.</p> <p>This now leaves the main point of difference between the applicant and NNDC relating to the mechanisms to secure an appropriate replacement planting period. NNDC welcomes the fact that the applicant has accepted the evidence from NNDC at Deadline 2 [REP2-087] which justifies the need for a ten-year replacement planting period within the District of North Norfolk so as to ensure successful establishment of trees, shrubs and hedgerows.</p> <p>However, NNDC notes that the commitment for a ten-year replacement planting period in North Norfolk has not yet been secured within Requirement 19 and the applicant explains that this is due to restrictions imposed by Article 27(12) of the draft DCO relating to temporary possession powers.</p>	<p>The Applicant refers to the response to the ExA's third round of written questions Q3.5.3.9 [ExA.WQ-3.D7.V1] regarding securing the 10 year replacement.</p>

Summary of Submission	Applicant's Comments
<p>Whilst NNDC note that the applicant has sought to include these commitments within the OLEMS, NNDC have reservations as to the effectiveness of securing appropriate replacement planting if this falls outside of the DCO Requirements.</p> <p>To remedy this situation, NNDC considers there are a number of options that need to be explored by the ExA prior to any DCO decision. These include:</p> <ul style="list-style-type: none"> <li>• amending the draft DCO text in relation to Article 27 (Temporary use of land for maintaining authorised project) so as to enable the undertaker to access land to carry out maintenance of and enable replacement of planting for a period of ten years in North Norfolk and five years in Broadland and Breckland (possession is reasonably required for the purpose of maintaining the authorised project); and</li> <li>• (Once appropriate amendments are secured to Article 27), amending Requirement 19 to secure a ten-year replacement planting period in the District of North Norfolk and five-year replacement planting period in the Districts of Broadland and Breckland</li> </ul> <p>NNDC would welcome discussion with the Applicant to seek to explore the issues highlighted above.</p>	
<p><u>Q2.9.5.1 and Q2.9.5.3 (Outline Landscape and Ecological Management Strategy (OLEMS) Comment -</u></p> <p>NNDC notes the position of the applicant in respect of the OLEMS set out across pages 97 and 98 of the Applicant's Responses to the Examining Authority's Further Written Questions [REP5-045].</p> <p>NNDC's position in respect of securing the replacement planting period is set out above at §2.1 to 2.8 [see row above].</p> <p>In respect of the updated OLEMS (Version 3) document submitted by the Applicant at Deadline 5 [REP5-022], in response to ExQ2 (Q Q2.9.5.3) NNDC recommended an additional bullet point to be added to paragraph 142 of version 2 (now para 147 of version 3). This proposed:</p> <ul style="list-style-type: none"> <li>• Where landowner agreement cannot be secured for replacement tree planting as close as practicable to the location where they were removed, Norfolk Boreas limited and/or its appointed contractor will provide an alternative scheme or</li> </ul>	<p>The Applicant confirms the additional text will be captured in an update to the OLEMS. The Applicant believes this text is sufficient to ensure no net loss of trees in North Norfolk.</p> <p>As detailed the Applicant will look to replant trees as close as practicable to the location where they were removed and will primarily be at an alternative location within the order limits but outside the cable easement. Where this is not possible, other locations will be investigated i.e. on land adjacent to the Order limits, subject to agreement with the landowner; or locations in the district (as close as possible to original location) where landowner agreement for tree planting has been secured. This information will be captured in an updated OLEMS to be submitted at Deadline 8.</p> <p>North Norfolk District Council will be consulted on the location of replacement planting as part of the approval of the final Landscape Management Scheme, secured under Requirement 18.</p>

Summary of Submission	Applicant's Comments
<p>schemes for replacement tree planting ensuring no net loss of trees within hedgerows in North Norfolk, which are an important landscape characteristic in this area.</p> <p>Following a teleconference with the applicant on 04 March 2020, NNDC understands that the applicant is likely to accept the suggested addition to the OLEMS, which is welcomed and this has been confirmed in the latest SoCG to be submitted at Deadline 6. The key issue for NNDC is to understand the process that Norfolk Boreas Limited would go through to secure that landowner consent for replacement planting and what happens if, for whatever reason(s), this consent cannot be secured and there is a net loss of trees within hedgerows in North Norfolk as a result of the proposal.</p>	
<p><u>Q2.12.0.3 (Cable corridor and ducting)</u></p> <p>NNDC set out its position at Deadline 5 with regard to the pros and cons trenchless crossing at Church Lane, Colby.</p> <p>In respect of NNDC's proposed alternative solution to enable trenchless crossing under Church Road, Colby submitted at Deadline 5, following a teleconference with the applicant on 04 March 2020, NNDC understands that the applicant is considering the option presented and will provide further comment in due course.</p> <p>Whilst the updated position of the applicant is awaited, NNDC would recommend that the ExA visit the Church Road, Colby area as part of the Accompanied Site Visit on 19 March 2020. This will allow all parties to see the site for themselves and to consider the alternative option(s) design to avoid unreplaceable tree loss over the easement area of the cable route.</p>	<p>The Applicant refers to the response to the ExA's third round of written questions Q3.12.0.5 [ExA.WQ-3.D7.V1] regarding Church Road Colby and further details are included in the Position Statement Church Road, Colby [ExA.AS-1.D7.V1], submitted at Deadline 7.</p>
<p><b>NNDC responses to Further Written Questions (which were unable to be provided at Deadline 6)</b></p>	
<p><u>Q2.12.1.3</u> - The ExA is not persuaded by the Interested Parties Response to Q5.2.2 [REP2-021] and [REP2-030] in the matter of restricting heights of temporary facilities in the dDCO, although it acknowledges that each location would be different in terms of sensitivity of receptors, and micro-siting within the mobilisation zones would take place at a later date. 1. If the worst-case scenario assessed is that the height of welfare facilities and storage units would be 3m [REP2-030, para 11], where is this secured? Why would this not be included in the dDCO? The ExA is not convinced that the Best Practical</p>	<ol style="list-style-type: none"> <li>1. The Applicant considers that this is best secured in the OCoCP which has been updated to secure this commitment.</li> <li>2. and 3. As detailed in the OCoCP [REP5-010] the final CoCP will include a site layout showing the location of mobilisation areas, trenchless crossing technique (e.g. HDD) compounds, onshore project substation temporary works area and National Grid substation extension temporary works area and the main features of these sites. As such these will be subject to a review and</li> </ol>

Summary of Submission	Applicant's Comments
<p>Means in the OCoCP [REP1-019, section 9.1] gives enough certainty that adverse construction effects on visual and other amenity would be addressed in an holistic way for sensitive receptors in proximity to mobilisation areas. 2. The Applicant and local planning authorities to comment on whether there should be a process set out and secured in the dDCO, which post consent, would identify those construction areas where consideration needs to be given to adverse effects on neighbouring communities (not just for noise and vibration). 3. If so, where would this be best located, and should it set out layout/ mitigation principles for specific compounds which go further than the mitigation currently set out in the OCoCP [REP1019]?</p> <p><u>In response –</u></p> <ol style="list-style-type: none"> <li>1. Visual issue – no EHO concerns</li> <li>2. Would be wise to have in place a process to identify and mitigate against a wide range of adverse effects including lighting, dust, visual amenity.</li> <li>3. Whilst some of these issues would fit within the OCoCP, there are other matters which relate more to visual amenity impacts, beyond the remit of Environmental Protection issues. Possible need for a requirement to agree details of height, colour etc of construction compounds</li> </ol>	<p>approval process by the relevant planning authority as part of the discharge of Requirement 20. Further information on the process for ensuring measures are in place to minimise any effects on neighbouring communities relating to these elements has been included in Section 3.2 of the OCoCP. The OCoCP sets out the principles which will be adopted to minimise effects, however, site-specific control measures will be identified when further details of the construction activities are available post-consent to ensure the most appropriate mitigation is identified.</p>
<p><u>Q2.12.2.5 - Enhanced mitigation:</u> In the response to ExA Written Questions [REP2-021, Q1.12.2.4] and the updated OCoCP [REP1-018], there is reference to need for enhanced measures at certain receptors. 1. Applicant to clarify how it would be determined whether enhanced mitigation would be required during construction? Would there be any consultation with the LPAs to determine this? 2. Are LPAs confident that the enhanced mitigation measures identified by the ES Chapter 25 [APP-238] would achieve the noise reductions identified in Tables 25.34, 25.36, 25.37 and 25.39 of the ES?</p> <p><u>In response -</u> Further consultation is seen as necessary and to be welcomed. Caution and concern is raised over the use of the higher ambient noise levels of Category B for receptors rather than Category A for some receptors in the four Tables mentioned. Particular reference is made to Table 25.36 on night working, regarding receptors CRR2 and CRR30 which are categorised as having a higher ambient noise category B which has</p>	<p>The Applicant refers to the updated OCoCP [REP5-010] submitted for Deadline 5, paragraph 131 and ES Chapter 25 Noise and Vibration, section 25.8.5.7 [APP-238]. These documents identify the receptors that require enhanced mitigation during construction in the daytime (CRR1E, CRR3F, CRR10), which can be identified on ES Figure 25.2 (APP-470). CRR1, CRR2, CRR3, CRR5, CRR26, CRR30, and CRR31 require enhanced mitigation in the event that night working is required during trenchless crossings. Mitigation measures utilised during construction will be discussed with and approved by the local planning authority via the final Code of Construction Practice and Construction Noise (and Vibration) Management Plan (CNMP).</p> <p>Please also refer to the Applicant's response to Q3.12.2.6 with regards to the ambient noise levels Category.</p>

Summary of Submission	Applicant's Comments
<p>threshold of 50 dB. Whilst details of the ambient noise data survey would be expected to have referred to, North Norfolk has particularly low night time noise levels and it is suggested that selecting Category A would be more appropriate and protect receptors from night-time noise disturbance. In addition, the use category A threshold of 45 dB(A) would be more appropriate and provide better protection and accord with the expectation that the noise levels at the facade of sensitive dwellings and receptors should not result unacceptable levels of noise nor sleep disturbance. There is general agreement that the measures listed within 25.8.5.7 Enhanced Mitigation describe a range of suitable measures and correctly evaluate the approximate noise reduction of barriers. Further consultation on the Control of Construction Noise is required and included as part of the application requirements.</p>	<p>The predicted construction noise levels were assessed against noise limits derived from advice within Annex E of BS 5228. These threshold levels were determined from measured representative existing baseline noise levels. The BS 5228 night time threshold corresponding to Category A is 45dBA. The BS 5228 Category B threshold (50dBA) at night-time was determined applicable to receptors CRR2 and CRR30 due to their locations in close proximity to the carriageway, (the B1145 and the A47 respectively). All other receptors were identified as Category A.</p> <p>However, in the interests of ensuring the protection of residential amenity during the sensitive night time period, the Applicant has no objection to adopting the 45dBA threshold i.e. Category A at all receptors.</p> <p>For context, along the Onshore Cable Route the conservative construction phase scenario identified exceedances over the night time 45dBA threshold at CRR1, CRR3, CRR5, CRR26 and CRR31. For the night time 50dBA threshold (Category B) only CRR2 and CRR30 exceeded this level during the proposed worst case scenario. In all instances enhanced mitigation measures were advised.</p> <p>The Applicant will update the text within the OCoCP to reflect that the 45dBA threshold will be adopted for all residential receptors during the night time period.</p>
<p><u>Q2.12.3.6</u> - Provide further clarity on the types of locations that are considered sensitive receptors when determining construction hours; are areas of importance to local community and local economy considered sensitive receptors? For instance, has regard been given to tourist areas in Happisburgh and North Walsham as sensitive receptors when determining construction hours? 2. NNDC to comment.</p> <p><u>In response</u> - The applicant and NNDC have produced a Joint Position Statement. The applicant has considered the comments of NNDC and is understood to be amending the OCoCP to be submitted the ExA for a future deadline. This Joint Position Statement identifies further noise sensitive receptors. Assessment of these additional receptors will</p>	<p>The Applicant has worked with NNDC to produce a Joint Position Statement [REP6-022] to agree the process for and locations of site-specific noise sensitive receptors. The Applicant proposes the following updates to the OCoCP [REP5-010] to be submitted at Deadline 7 to secure the definition of noise sensitive receptors and the process to be followed as part of the development of the CNMP;</p> <ul style="list-style-type: none"> <li>• Include the agreed table to provide a definition of noise sensitive receptors;</li> <li>• Provide additional detail on the receptors locations requiring enhanced mitigation to include road name and village and a map reference; and</li> </ul>



Summary of Submission	Applicant's Comments
<p>be required. It is recommended that mitigation measures should include consideration of reduction of working hours as an option for all sensitive receptors.</p>	<ul style="list-style-type: none"> <li>• Include additional text to confirm the development of the CNMP will include a review of the construction activities and the identification of any potential noise sensitive receptors which may be affected and identify any potential control to minimise effects.</li> </ul>
<p><b>NNDC Further Response to Further Written Questions</b></p>	
<p><u>Q2.5.7.1 (Schedule 16: Procedure for Discharge of Requirements)</u></p> <p>In its Deadline 5 Representation on ExQ2 (Q2.5.7.1), NNDC set out its position with regard to the discharge of Requirements. NNDC welcomes the indication by the applicant that a Planning Performance Agreement (PPA) would be supported. The key now is to understand how the discharge of requirement process would work in reality and how a PPA could help ensure better outcomes in the wider public interest.</p> <p>In its response to Q2.5.7.1, NNDC indicated that it would look at this issue further and has done so. The first consideration is to look at the draft DCO Requirements (Version 5) [REP5-003]. NNDC has compiled a table with sets out the onshore requirements (Requirements 15 to 35 inclusive). This identifies who is the Discharging Authority / Relevant Planning Authority for each Requirement and who would likely need to be consulted both internally within the Discharging Authority / Relevant Planning Authority and externally. A copy of the first draft of this document is attached at Appendix B. This document is to be shared with other relevant planning authorities and discharging authorities and the Applicant for comment and any suggested amendments.</p> <p>In addition, NNDC has also begun to map out the Requirement discharge process based on draft DCO Schedule 16. A copy of the first draft of this document is attached at Appendix C. Again, this document is to be shared with other relevant planning authorities and discharging authorities and the Applicant for comment and any suggested amendments. Mapping out this process enables further consideration as to whether draft DCO Schedule 16 delivers its intended purpose as well as beginning to understand supporting processes including how requests are made, how Requirement discharge decisions are issued and what they look like.</p> <p>The applicant and all Discharging Authorities / Relevant Planning Authorities are seeking to meet at the earliest opportunity to discuss this matter further. It would be helpful to</p>	<p>The Applicant refers to the response to the ExA's third round of written questions Q3.5.7.1 and Q3.5.7.5 [ExA.WQ-3.D7.V1] regarding Schedule 16 and the Planning Performance Agreement.</p>

Summary of Submission	Applicant's Comments
do this so that any further refinements that may subsequently be needed to Schedule 16 can be included in the final draft DCO.	
<b>Tourism Impacts</b>	
NNDC's LIR [REP2-087] provided significant detail and evidence in relation to tourism impacts, starting from paragraph 14.21, including suggested wording for a DCO Requirement relating to tourism and associated businesses. NNDC note the Applicant's response to EXQ2.13.2.1 across pages 118 and 119 of the Applicant's Responses to the Examining Authority's Further Written Questions [REP5-045]. It is clear from that response that the applicant still refuses to accept the tourism impacts asserted by NNDC and so it would seem that we are at an impasse. NNDC would respectfully ask that the ExA provide direction to both parties on this matter. Do the ExA agree with the position set out by NNDC? Is the evidence submitted to date enough? If not, what further evidence would be expected.	The Applicant has previously explained through the Position Statement at Appendix 1 [REP3-011] titled 'Position Statement North Norfolk District Council Requested Requirement to Address Perceived Tourism Impacts' that it considers there is no evidential link that the short-term construction presence for an offshore wind farm in North Norfolk would lead to an actual or perceived impact on tourism. The Applicant has fully assessed this in the ES (Chapter 30) [APP-243]. The Applicant is not aware of any precedent for mitigation on tourism impacts as a result of temporary construction impacts from offshore wind farms, and it would be wholly unreasonable and lack precision to require mitigation by way of an unquantified financial payment with no agreed or adopted mechanism for its calculation post consent.
Other Matters – NNDC makes reference to updated positions within the SoCG and as outlined, the production of a Joint Position Statement.	The Applicant has submitted both these documents at Deadline 6 [REP6-036] and [REP6-022].

## 1.4 Oulton Parish Council REP6-044

Summary of Submission	Applicant's Comments
<b>Comments on Responses to Further Written Questions</b>	
<p><b>1. Impact on Harvest</b></p> <p><u>Q2.12.2.8</u> 2. Could harvest and other events mean that HGV movements are concentrated at certain times of the day? What are the potential implications and how would these be mitigated? "</p> <p><u>Comments</u></p>	The cumulative traffic generated by Hornsea Project Three and Norfolk Vanguard using the Street/Heydon Road was modelled by HP3 and submitted to the respective project's examinations for scrutiny. The outputs serve as a direct proxy for Norfolk Boreas scenario 1/HP3 cumulative impact and as such 'Main Construction Compound Access Strategy VISSIM Modelling Update' [REP3-004 and REP3-005] was submitted at Deadline 3.

Summary of Submission	Applicant's Comments
<p>OPC would like to note that the coordination of traffic seems only to refer to Vattenfall's HGVs and agricultural vehicles along the Heydon Rd section.</p> <p>No account is being made here for the cumulative impact of traffic generated by the Hornsea Three Main Construction Compound, along with Vanguard/Boreas traffic, and agricultural vehicles, all travelling to and from the B1149 along the southern section of The Street. The congestion that will inevitably occur on that section of Link 68 is being conveniently ignored.</p> <p>Will harvest traffic take priority over construction traffic when harvest periods are dependent – at short notice - on the weather or moisture content of grain or maize, and require a concentrated window of punishing harvest traffic movements arising from a combination of the crop condition and the efficient use of scarce, highly expensive harvesting machinery? Even if the local large agribusiness owners are prepared to “share” information with the Applicants (something which they have thus far been unwilling to do) the farmers themselves often have little warning of when they might suddenly have to commence the next harvest.</p> <p>There is also the question of how exactly the Applicant intends to “liaise” with many other not-so local small farmers and large contractors who use Oulton Street on a regular basis.</p> <p>OPC is obliged to observe again, at the risk of repetition, that “harvest” is actually a six-month period (at least) of every year, involving 7 or 8 completely different crops with different patterns of activity. It is not a little blip or “event” in the calendar – it is what is going on around here most of the time.</p> <p>Finally, on this particular issue, OPC have not seen any evidence that the in-combination traffic at the junction of Oulton Street with the Heydon Road has ever been properly assessed. This currently quiet junction will be required to absorb the complexity of:</p> <ul style="list-style-type: none"> <li>• all traffic entering and leaving Orsted's Main Construction Compound, • all agricultural traffic entering and leaving Saltcarr Farms (sharing same access as above)</li> <li>• all traffic generated by Vanguard/Boreas MA7 and CLA</li> <li>• 50% of all traffic generated by Street Farm</li> <li>• all traffic entering and leaving the poultry farm</li> </ul>	<p>The document sought to understand the potential increases in delay that could occur during and along The Street by assessing the following future scenarios:</p> <p>Scenario 1 – 2028 Base Traffic;            Scenario 2 - 2028 Base + Hornsea Traffic;            Scenario 3 - 2028 Base + Hornsea + Potato Farm Traffic;            Scenario 4 – 2028 Base + Hornsea + Potato Farm+ Agricultural Traffic;            Scenario 5 – 2028 Base + Hornsea + Potato Farm + Agricultural Activity + Norfolk Vanguard Traffic.</p> <p>The document concluded that for future Scenario 5, a total delay of 38 seconds to the journey from the Street to the B1149 would occur, which is not considered to be a significant impact.</p> <p>The scheme has been subject to an Independent Road Safety Audit and Norfolk County Council has indicated no technical objections.</p> <p>Liaison between the respective projects and the local agricultural community would be undertaken to understand harvest times and how cumulative delivery schedules can be organised to suit and minimise any impacts to the local agricultural community and residents of OPC.</p>

Summary of Submission	Applicant's Comments
<ul style="list-style-type: none"> <li>• all other non-local agricultural traffic</li> <li>• all commuter and “ordinary” traffic</li> <li>• all cyclists, joggers and dog-walkers</li> </ul>	
<p><b>2. Cycle Routes</b></p> <p><u>Q2.14.2.9</u> What assessment has been undertaken of the use of Link 68 by Non-Motorised Users (NMU) including cyclists? 2. What mitigation is proposed to ensure the safe passage of NMUs at this location and where is this secured?</p> <p><u>Comments</u></p> <p>OPC note that the Applicants have dismissed Link 68 as a cycle route, as it is not designated. This is incorrect and extremely misleading. It should be noted that Link 68 is used by many individual cyclists, often by cycling clubs from near and far, doing a circuit from Aylsham or Norwich, and those who wish to join up with the Blickling Cycle route, along with Itteringham village shop/cafe off Link 75. It is also seen as a “safe” circular route for joggers, families with young children cycling out informally from Aylsham - across Abel Heath, along Heydon Road, up Oulton Street and back via Aylsham Road. In fact, there are 3 designated cycle routes (figure1-3) that pass either along or near Oulton Street</p> <p>As part of the road intervention scheme along The Street there will be the loss of verges to accommodate the proposed passing places. This will limit the safe refuge for those who will be using Link 68 on foot. There are plenty of people who walk/jog this route, especially local people who walk their dogs on the road, due to the limited number of public rights of way in this part of the village.</p> <p>PC observe that the road intervention scheme is being put forward as mitigation for safe access for ALL road users, but this intervention scheme is actually proposed in order to accommodate the needs of two HGVs passing safely. It will be at the minimum width allowable (6m) to accommodate two HGVs, and there will be stretches of the road which will be narrower, in between the passing places. As stated earlier, to provide for the passing places, the verge will be removed and replaced with Grass-Crete or similar. In</p>	<p>The Applicant refers Oulton Parish Council to the Applicant's response to the ExA's written question Q2.14.2.9 [REP5-045]. The Highway Mitigation Scheme has been designed to comply with the functional hierarchy of the link. As there is no formal cycleway, bridleway or footpath designation there is no requirement to make special provisions for this mode of travel. The scheme was subject to an Independent Road Safety Audit to identify aspects of engineering interventions that could give rise to road safety problems. The RSA and the scheme was subsequently approved by NCC.</p>

Summary of Submission	Applicant's Comments
<p>some respects The Street could be considered as being rendered less safe than the B1149 due to the reduced safe refuge areas (loss of verge) for walkers/cyclists to stop if needed to let large vehicles proceed or to avoid potential accidents.</p> <p>The alternative to cyclists and walkers currently using this road would probably mean an avoidance of this route. If this were the case then it would entail for the local community and visitors the loss of an activity which is currently promoted as part of a healthy lifestyle.</p> <p>The safety training the Applicant has described above, would only apply to the contractor drivers. No other drivers using this road – agricultural, commuter etc. - would have the benefit of this safety “induction”. Accidents and near misses could occur involving other road users, on a rural road that would have been designed specifically to accommodate increased HGV traffic, rather than with cyclists and walkers also in mind.</p> <p>As OPC has already highlighted, the residents of The Old Railway Gatehouse live extremely close to the complex junction of The Street with Heydon Road. HGVs and other traffic will be accessing Hornsea 3 Main Compound, as well as Vanguard/Boreas MA7 and CLA, and HGVs will be waiting outside their house, due to the priority signage restrictions past their property. It will also be problematic for them on a daily basis, trying to enter and exit their property on foot when walking their dogs, and in a vehicle.</p>	
<p><b>3. Outstanding Issues</b></p> <p>The Applicants still have not answered OPC in regard to the unexplained extra vehicles on Link 75 for Scenario 1: viz: 110 all vehicles/70 HGVs. OPC wish to understand why this is the only scenario which requires 40 (daily) extra vehicle movements along this route. An explanation is needed as to where these vehicles are going, and why, within Norfolk Vanguard /Boreas scenario 2, these extra vehicles are not required.</p>	<p><b>Norfolk Boreas (NB) Scenario 1</b></p> <p>During Scenario 1 – Link 75 is required to access Cable route sections 10 and 11. This equates to the following movements:</p> <ul style="list-style-type: none"> <li>• Cable section 10 = 36 HGV movements and 20 Employee movements</li> <li>• Cable Section 11 = 34 HGV movements and 20 Employee movements</li> </ul> <p>The destination of the total 110 total vehicle movements (70 HGVs and 40 employee movements) is to either AC75, AC77 or AC78.</p> <p><b>NB Scenario 2</b></p> <p>During Norfolk Boreas Scenario 2 – Link 75 is required to access one side of the River Bure Trenchless Crossing. This equates to the following movements;</p>

Summary of Submission	Applicant's Comments
	<ul style="list-style-type: none"> <li>River Bure Trenchless crossing = 72 HGV movements</li> </ul> <p>Further investigation revealed 20 employee movements have been omitted in error, which gives a cumulative total vehicle movements of 92.</p> <p>The addition of the 20 employee movements would not change the final assessed impacts</p> <p>The destination of the total 92 total vehicle movements are to either AC75 or AC77.</p>

## 1.5 Marine Management Organisation REP6-045 and REP6-046

Summary of Submission	Applicant's Comments
<b>REP6-045 Comments on Responses to Further Written Questions; and REP6-046 The MMOs Comments on draft DCO</b>	
<p><b><u>Updating documents at the end of examination</u></b></p> <p>There are a number of comments on WQs which fall under this heading (WQ.2.2.0.2, WQ.2.5.1.2, and WQ.2.5.1.9):</p> <p><i>"The MMO wishes to continue discussions with the applicant regarding a further summary documents where all parameters and boundaries whether on the face of the DCO or not are pulled together in one place to aid understanding and the enforcement and monitoring duties of the MMO's coastal staff."</i></p> <p>In the MMO's comments on the DCO:</p> <p><i>The MMO believes the Notes on Requirements (REP5-057) is very helpful and provides clarity on what each certified document is and when it will be submitted. However, the MMO wishes to discuss this issue further with the Applicant as the MMO would prefer any parameters, not on the face of the DCO and in certified documents, to be in a table within this document.</i></p> <p><i>The MMO wishes to continue discussions with the applicant regarding a further summary</i></p>	<p>This was discussed with the MMO on 12<sup>th</sup> March 2020 and the Applicant clarified that Schedule 18 would contain certified documents relevant to MMO enforcement officers. The Applicant also explained that Schedule 2 of the Explanatory Memorandum contains a comparison of the DML conditions to enable equivalent DML conditions across each of Schedule 9-13 to be compared for ease of reference. Schedule 3 of the Explanatory Memorandum then sets out a list of order parameters together with where these are secured in the DCO. This includes parameters for the Wind Turbine Generators, Offshore Electrical Platforms, meteorological masts, Lidar measurement buoys, cable protection figures, foundation types and associated parameters, scour protection, and disposal limits.</p> <p>The Applicant understands that the MMO agree with this approach in principle but require further internal discussions to be able to confirm whether this issue has been fully resolved. The outcome of these discussions</p>

Summary of Submission	Applicant's Comments
<p><i>documents where all parameters and boundaries whether on the face of the DCO or not are pulled together in one place to aid understanding and the enforcement and monitoring duties of the MMO's coastal staff.</i></p> <p>It should be noted that Natural England would like a full update of the ES.</p>	<p>will be reflected within the SoCG with the MMO to be submitted at Deadline 8.</p>
<p><b><u>Sandeel Monitoring</u></b></p> <p><i>The MMO requires a further update to the IPMP to include the collection of sediment samples for the purpose of particle size analysis (PSA) – the proposed wording is below: “As explained in section 4.3.2, if at the time of completion of the final detailed plan there is good, evidence based, justification for increasing the scope of the benthic surveys this will be agreed with the MMO and included within the final plans. If a scope increase for the benthic surveys included sediment sampling within the wind farm site <u>for the purpose of Particle Size Analysis (PSA)</u>, the data from that survey could be used to better understand any changes in habitat suitability for sandeels. This would be agreed with the MMO though the final plan.”</i></p> <p><i>The MMO and its Scientific advisors are willing to discuss an alternative approach if the Applicant wishes to pursue geophysical surveys as a method of monitoring changes to sediment composition and sandeel habitat across the site. If this was preferable to the Applicant then the MMO and its Scientific Advisors would be happy to review any method or proposal provided by the Applicant in more detail.</i></p>	<p>The Applicant is content to make the proposed change to the outline IPMP and has submitted an updated version at Deadline 7. This will also be reflected as agreed in the updated SoCG to be submitted at Deadline 8.</p>
<p><b>Marine Mammal monitoring condition</b></p> <p>The MMO's comment on the Applicant's answer to WQ2.2.0.5 was:</p> <p><i>The MMO understands that NE will be submitting a condition at Deadline 6. The MMO will review the condition provided by NE and provide comments at Deadline 7.</i></p> <p>Natural England's proposed conditions are as follows:</p>	<p>This was discussed with the MMO during a meetings on 12<sup>th</sup> and 17<sup>th</sup> March 2020. The Applicant has provided a detailed response to these proposed conditions in the Applicant's Responses to the Third Round of Written Question [ExA.WQ-3.D7.V1] Q3.2.0.1</p>



Summary of Submission	Applicant's Comments
<p><b><i>“Within Pre construction monitoring condition 18 (2) (d) appropriate surveys of existing marine mammal activity required to test predictions in the environmental statement concerning key marine mammal interests of relevance to the authorised scheme.”</i></b></p> <p><i>Within Post construction monitoring condition 20 (2) (e) appropriate marine mammal surveys required to test predictions in the environmental statement concerning key marine mammal interests of relevance to the authorised scheme</i></p>	
<p><b>End of construction</b></p> <p>The MMO's comment on answers to WQ2.5.0.1 was:</p> <p><i>“The MMO agrees that the Applicant must notify the MMO and Seafish of construction in Condition 9 of Schedule 9-10 and Condition 4 of Schedule 11-12 and Condition 3 of Schedule 13</i></p> <p><i>However, the MMO requests clarity from the Applicant on what the Applicant classes as ‘completed construction’? The MMO understands that all parties could have a different view of when construction is completed and therefore the MMO requests this is clear within the DMLs. The MMO will continue discussion with the Applicant.”</i></p>	<p>The Applicant discussed this further with the MMO on 12<sup>th</sup> March 2020, the Applicant explained the notification requirements within Condition 9 of Schedule 9-10 and Condition 4 of Schedule 11-12 and Condition 3 of Schedule 13 which provides that the Applicant must notify the MMO (including Kingfisher Information Service of Seafish and the UK Hydrographic Office) upon completion of licensed activities (for example, Condition 9 (Schedule 9- 10)). In the case of the Kingfisher Information Service of Seafish notification, this must be no later than 24hours from completion of construction of all offshore activities.</p> <p>Further discussions were had on what represented the end of construction and an understanding was reached as to how the process on testing, commissioning and handover from contractor to operator would occur. The MMO were content that nothing further was required from the Applicant and this will be reflected within the SoCG to be submitted at Deadline 8.</p>
<p><b>Cable crossings</b></p> <p>In the comment on responses to WQ 2.5.0.2 <i>“The MMO has provided further updates to the Applicant and has summarised these within Document XX.”</i></p>	<p>The Applicant has confirmed with the MMO that this is in reference to the SOCG submitted at Deadline 6 [REP6-029] in which the MMO state that: <i>“The MMO acknowledges the Applicant’s comments on the matter of cable crossings and on this occasions accepts that specific instances of cable crossings cannot be specified at this time and volumes of cable protection are secured within the DCO/DML.”</i></p> <p>Therefore, as presented in the SoCG this matter has been agreed.</p>

Summary of Submission	Applicant's Comments
<p><b>Definition of inert</b></p> <p>In responses to WQ 2.5.0.2: <i>The MMO still requires the inclusion of a definition of inert – the MMO has sent further comments to the Applicant, has received a response and is reviewing this internally. The MMO will provide an update at Deadline 6.</i></p>	<p>The Applicant has provided a detailed update on discussions on the definition of inert in the Applicant's Responses to the Third Round of Written Questions [ExA.WQ-3.D7.V1] Q3.5.0.1.</p>
<p><b>Individual parameters</b></p> <p>The MMO's comment on the Applicant's response WQ.2.5.2.1 was:</p> <p><i>The MMO will review the Applicant's Deadline 6 submission and advise at Deadline 7 if the MMO is in full agreement on this matter.</i></p>	<p>The MMO and the Applicant discussed this on 12<sup>th</sup> March 2020 and agreed that with updates in the DCO which refer to the outline Scour Protection and Cable Protection Plan the MMO are in agreement that this issue has been resolved.</p>
<p><b>Ornithological monitoring plan</b></p> <p>The MMO comment on the Applicant's response to WQ.2.5.5.2:</p> <p>Wording for the outline ornithological plan be amended to:</p> <p><i>(l)In relation to ornithological monitoring— (i)An <b>outline ornithological monitoring</b> plan setting out the aims, objectives and timing for ornithological monitoring which must be submitted to the MMO (in consultation with the relevant statutory nature conservation body) at least four months prior to the first pre-construction survey (as referred to in Condition 14(1)(b)(aa)),</i></p>	<p>This was discussed with the MMO on 12<sup>th</sup> of March 2020 and the Applicant explained further that the rationale behind the condition was to provide an overview plan or programme early on and then the full Ornithological Monitoring Plan would be provided in accordance with the programme and objectives previously submitted under the first limb of Condition 14(1)(l). The Applicant also explained that the wording had been agreed with Natural England as they first raised the issue. The Applicant understands that the MMO are happy with this explanation and no longer require the change proposed. The Applicant has however made a minor change to clarify the intention of the condition, and the updated wording will be reflected in the dDCO submitted at Deadline 7.</p>
<p><b>Particle Size Condition</b></p> <p>The MMO's comment on the Applicant's response to WQ.2.8.3.1 was:</p> <p><i>"The MMO understands the Applicant is no longer looking at working on draft disposal principles and remains of the position that no condition is required due to the mitigation set out in the SIP (or alternative plan as discussed in REP5-057). The MMO is continuing discussions with both NE and the Applicant on this issue."</i></p>	<p>This was discussed with the MMO on 12<sup>th</sup> March 2020 where the Applicant outlined its position that the mitigation proposed by the Applicant was sufficient, in particular as a result of:</p> <ul style="list-style-type: none"> <li>• A commitment to dispose of material using a fall pipe.</li> <li>• Disposing of material in a linear strip along the corridor.</li> <li>• Disposing of material up drift so that it infills.</li> <li>• Disposing of material as close as possible to the dredged location.</li> </ul> <p>The Applicant considers that this is the best method for ensuring that the disposed sediment is as similar as possible to the seabed on which it is being</p>

Summary of Submission	Applicant's Comments
	deposited. The MMO acknowledged that the Applicant had sought to address Natural England's concerns as far as possible and the Applicant understands that the MMO intend to discuss this directly with Natural England.
<p><b>As Built vs Consented turbine numbers</b></p> <p>The MMOs comment on the Applicants response to WQ.2.8.4.6:</p> <p><i>"The MMO understands the Applicant requires further comments from the MMO in relation to this. As part of the Norfolk Vanguard submission the MMO is reviewing this in more detail and will provide a further response during the Examination for Norfolk Boreas. "</i></p>	The MMO and the Applicant discussed this issue on 17 <sup>th</sup> March 2020 at which the MMO informed the Applicant that they agreed it was acceptable to use consented numbers (including where varied through subsequent consents). The MMO raised concerns with using as built numbers, but agreed to consider further the position where wind farms had been built out to their full consented capacity (as in the case, for example, of Hornsea 1).
<p><b>Site Characterisation report.</b></p> <p><i>There is one minor presentational comment in relation to Table 4.1, this may cause confusion on the volumes to be disposed of. The MMO suggests that the cells in the last column ('Disposal Area') for the first 7 rows are merged to make it clear that these volumes are to be disposed of within the new disposal site. The MMO provided the Applicant with a confirmation letter with the disposal site references for the DCO/DMLs on 4 March 2020</i></p>	The Applicant has agreed to make the proposed change and will submit an updated version of the Site Characterisation Report to the examination for Deadline 7. Note as the change is so minor the final clean version only will be submitted and not a tracked change version.

## 1.6 Natural England REP6-050 and REP6-051

4. The Applicant has reviewed Natural England Response to Offshore Issue Specific Hearing Action Points [REP6-050]. The only outstanding point (A condition for monitoring marine mammals) is raised under Q3.2.0.1 of The Examining Authority's third round of written questions and requests for information [PD-014]. The Applicant has provided a detailed response to this question in The Applicant's Responses to the Third Round of Written Question [ExA.WQ-3.D7.V1]
5. The Applicant note and agree that the updates made to the Deadline 6 Submission - Risk and Issues Log [REP6-051] reflect the current position of Natural England on all matters included within and therefore no further comment is required.

## 1.7 Necton Substation Action Group REP6-052

Summary of Submission	Applicant's Comments
<p><b>Comments on Responses to Further Written Questions</b></p>	
<p><u>Q2.9.1.2</u> The Applicant Public and private views: 1. Further to the comments arising from the ASI [REP4-055] and [REP-4-045], set out how the LVIA methodology you have adopted has taken account of views, picking up the points made regarding public and private. It is requested that this be in a way that a lay person can appreciate, rather than referring back to the LVIA methodology statement in the ES. 2. Explain in this public/ private context how Necton is a principal receptor for visual impact. Also, seemingly contrary to the impression gained by IPs on the ASI (above) explain how residential visual amenity has been included, which appears to have been assessed [APP-242, Table 29.13, Viewpoints VP8, VP9, VP10, VP12]. 3. Included in this explain how the viewpoints were selected and agreed with whom. 4. Is there a viewpoint assessed which would represent the views from the camp site referred to by NSAG [REP4-050]? 5. Confirm whether visualisations of what would be seen from peoples' homes were used at consultation events.</p> <p><u>In response:</u></p> <p>1. The Applicant has never stated that the proposed development would not be visible from Necton or Ivy Todd....</p> <p><i>As the ExA was at the ISH on 21st February 2020 we are confident that they know that the applicant did indeed say this.</i></p> <p>2. St Andrews Lane. Here, the rear facades of residents are orientated towards the proposed development. In the assessment, consideration was given to how their views would be affected by the proposed development, taking into account the potentially fuller extents of visibility from upper floors.</p> <p><i>To do this in full the applicant would have to visit the homes in St Andrew's Lane, which they have not done. Nor have they visited the gardens of the properties. They are basing our futures on guesswork.</i></p> <p>4. The Applicant is unclear what camp site is being referred to and are not aware of a camp site in Ivy Todd. There is no camp site marked on Ordinance Survey (OS)</p>	<p>1. When read in context, the sentence which states “<i>We have viewpoints from Necton that show that visibility is very limited...</i>” accepts that there will be visibility but that it will be limited in geographical extents. As recorded in the LVIA, the assessment relating to Viewpoint 8: Chapel Lane and Viewpoint 9: St Andrews Lane, explicitly sets out the potential for visibility to arise from the rear of the properties on this eastern periphery of the settlement. The comment made in the hearing “<i>...that we don't actually see the substation from the settlement of Necton</i>” is with reference to the actual settlement; i.e. the publicly accessible streets and other spaces as opposed to the private internal and external spaces associated with the properties on the eastern periphery.</p> <p>2. It is standard practice for the assessment of effects on residential visual amenity to be carried out from the nearest publicly available or accessible vantage point. This reflects the private nature of homes and associated garden grounds. In respect of the properties on the eastern side of Necton, site work was carried out on St Andrews Lane and Chapel Road.</p> <p>4. With apologies, without the name of the campsite, we were unable to find it in a search.</p> <p>The photograph provided by NSAG shows an open view across fenced paddocks. The photograph of Mona Bungalow Campsite on the Caravan and Motorhome Club website shows a space enclosed by a dense and tall evergreen hedge. <a href="https://www.caravanclub.co.uk/certificated-locations/england/norfolk/swaffham/mona-bungalow/">https://www.caravanclub.co.uk/certificated-locations/england/norfolk/swaffham/mona-bungalow/</a></p> <p>A site visit has confirmed that this campsite is enclosed by a high and continuous coniferous hedge, with the exception of an opening on the south, where access is drawn from adjacent Chapel Road and a small opening on the north. This means that views from within the campsite will be screened by the enclosure of the high hedge. The more open views, as</p>

Summary of Submission	Applicant's Comments
<p>mapping, no signs in the village to indicate the presence of a camp site and no references to a camp site on the internet.</p> <p><i>This campsite along with the several other tourist lettings in Necton have been pointed out many times to the applicant, but have all been ignored. So they are well-aware of this campsite, but it has been convenient to them to not acknowledge it. Their internet searches seem to be inadequate and inefficient. On a search the site came up first: <a href="https://www.freedomcampingclub.org/campsite/Norfolk/Swaffham/MonaBungalow/6866">https://www.freedomcampingclub.org/campsite/Norfolk/Swaffham/MonaBungalow/6866</a></i></p>	<p>represented by the photograph submitted, appear to be taken from the paddocks to the east.</p>
<p>We noted in the Applicant's Response to 2.9.4.1 The Applicant Substations: agricultural style: 1. Provide photograph(s) of example(s) of buildings (a cluster of buildings would be useful) in the "agricultural style" typology at 19m high or similar, which is proposed for the proposed project substation converter halls, with some indicator of scale in the photographs and a description which includes location/ surroundings, height, width and length, and materials. 2. Superimpose a worst-case scenario (in terms of dimensions) illustrative outline of the proposed substation converter hall building(s) on a photograph (taken from a public viewpoint) of the agricultural buildings at the proposed cable logistics area site at Oulton Street.</p> <p><u>In response:</u> <i>That they appeared to be unable to comply with the request, so we asked someone with the right software to do something similar to what was being asked of the applicant. The image attached is a to scale drawing of the large agricultural barn situated at Necton Farm, facing onto Ivy Todd Road in Necton. We chose this barn because we have the planning application for it, so were able to easily verify the dimensions.</i></p> <p><i>Behind the barn we superimposed a worst case simulation of the Boreas substation. We hope this might go some way towards what you needed to see. Of course with Vanguard the substations' size will double.</i></p>	<p>Although we cannot comment on the accuracy of the visualisations, they do provide an indication of the relative scale of the onshore project substation. As detailed in the Applicant's response to Q2.9.4.1, the Applicant had a number of concerns regarding the request to produce a visualisation showing the converter halls superimposed on the agricultural building on Oulton Road. Context is a critical and integral consideration in the assessment of the visual impacts of the onshore project substation. The visualisations from the twelve agreed viewpoints represent the proposed development in respect of its local context. The understanding and perception of scale relates to how the converter buildings are seen in this context and is largely based on a comparison with the scale of the landform and other landscape features. A key feature of the site is that there are few settlements, roads or paths within close proximity, and this has been one of the most important determining factors in site selection. This means that there are no especially close range viewpoints and the converter halls will not be experienced at close proximity – a deliberate intention achieved through the site selection process.</p> <p>By producing a visualisation in which the converter buildings are placed in a context in which they would never be seen as misleading. There is no agricultural building adjacent to the converter buildings with which a direct scale comparison could be drawn. There are also no roads that come close to the converter halls and from which they would be seen in especially close proximity. In terms of understanding the visual impacts of the converter halls there is no better substitute than the LVIA visualisations which have been prepared following best practice guidance and standards and</p>

Summary of Submission	Applicant's Comments
	illustrating the proposed development in the exact context in which it would be experienced.

## 1.8 Necton Substation Action Group REP6-053

Summary of Submission	Applicant's Comments
<b>Comments on Appendix 9.31 [APP-698]</b>	
<p>We have already questioned the applicant's assertion that someone at this meeting, which you have kindly published the minutes for said, <i>'the preference of the consultees was not to have large bunds around the onshore project substation as it was considered that this would appear incongruous with the local landscape character.</i> (Section 6.5.1.1 and 6.5.2.1 of OLEMS [REP1-020]).</p> <p>On checking the minutes of the meeting, neither this exact statement or anything like it was made by anyone there. Request for further details of where this was discussed. This statement has formed the very heart and only reason for, the applicant's refusal to create earth bunds around the substations, which is what all local people want, we now ask that the DAS should contain provision for large earth bunds.</p>	<p>At the Expert Topic Group Meetings on 19<sup>th</sup> July 2017 and 24<sup>th</sup> January 2018, bunds were briefly discussed with the opinions of the consultees sought, as reflected in the summary of the meetings. At paragraph 3.5 of the 19<sup>th</sup> July 2017 meeting note Jo Phillips introduced bunding as a potential component of landscape mitigation <i>"JP explains about the options for mitigation such as mounds, planting etc"</i>. And then at paragraph 5.4 <i>"Consultation raised question of bunding but usually brings more attention"</i> is the comment recorded which reflected the discussion between the consultees that large bunds could look out of character within the local landscape.</p> <p>At paragraph 7.3 of the 24<sup>th</sup> January 2018 meeting note it states; <i>"JP suggested the use of surplus topsoil to create a low gradient building (note the typographical error, as this should read 'low gradient bunding') up to a raised profile to help mitigate the visual impact as quickly as possible. CB agreed that as long as the profile doesn't involve a steep gradient, this is acceptable."</i></p> <p>Those expressing an opinion on this matter included Peter Coe of Capita, representing Breckland Council and Cathy Batchelar, representing North Norfolk District Council.</p> <p>Meeting notes for the meetings referred to above are provided in (Appendix 9.31 of the Consultation Report [APP-068]).</p>



## 1.9 Necton Substation Action Group REP6-054 and REP6-055

Summary of Submission	Applicant's Comments
<b>3D view of proposed substation convertor hall with agricultural buildings at Oulton Street</b>	
<p>Please find attached a series of .jpg files showing different views of the Oulton Street cable Logistics site recreated in 3D perfect scale together with the Vattenfall Convertor buildings set at the declared dimensions of 110x70x19metres.</p> <p>This is in response to your questions to the Applicant who was apparently unable or unwilling to provide your requested comparison of the substation buildings, against the known barns sited at the cable logistics site. I could follow this email with the SketchUp file to provide you with your own way of spinning around and viewing the different perspectives at your own leisure, together with a link to the FREE software from Google Trimble to view this file type... however the file is 18MB large and your systems may struggle to permit it.. please advise how I can send it to you.</p>	<p>The Applicant refers to the comments made to REP6-052 in Table 1.7.</p>

## 1.10 Water Management Alliance REP6-057

Summary of Submission	Applicant's Comments
<b>Response to Further Written Questions</b>	
<p>Q2.15.0.1 - Proposed disapplication of secondary consent, in relation to drainage: The Applicant provides an explanation in [AS-024] table 15 item 5 for the proposed disapplication under dDCO Article 7 (3) of secondary/ additional consents, with reference to representations by Water Management Alliance [RR-104] and by Norfolk CC [RR-037]. Are parties content? If not, why not?</p>	<p>The Applicant has responded to this point in their response to the ExA's third round of written questions Q3.5.8.6 [ExA.WQ-3.D7.V1].</p> <p>In summary, the Applicant considers that Byelaws 3 and 28 are covered by the Protective Provisions detailed in 'Schedule 17 Part 7, For the Protection of the Environment Agency and drainage authorities'. Further clarification was provided to the WMA to explain how this is captured in the existing Schedule and the WMA responded to indicate that they were encouraged by the confirmation, however in order to fully assuage their concerns, the</p>

Summary of Submission	Applicant's Comments
<p><u>Response -</u></p> <p>Under normal circumstances the regulatory regime, and specifically the Byelaws (created as per Section 66 of the Land Drainage Act 1991), of each WMA Member Board safeguards the ability of each Internal Drainage Board (IDB) to secure the efficient working of the drainage system or effectiveness of flood risk management work within their Internal Drainage District. I note that the DCO has proposed to dis-apply the Board's Byelaw's, replacing these with the details in Schedule 17, part 7 of the DCO application. I would like to seek assurance from the applicant that the following provisions of the WMA Member Board's Byelaws (specifically Byelaws 3 and 28 of the Broads 2006 Internal Drainage Board and the Norfolk Rivers Internal Drainage Board) have been considered and are safeguarded within Schedule 17.</p> <ul style="list-style-type: none"> <li>• Byelaw 3. Byelaw 3 regulates the introduction of water and increased total volume of flow to the Board's Internal Drainage District. While Schedule 17, part 7 does include changes to 'the volumetric rate of flow of water' as part of 'specified works', we are concerned that this does not include the possible increase in total volume of water entering the Internal Drainage District.</li> <li>• Byelaw 8. Byelaw 28 enables the Board to apply appropriate conditions when granting consent. As such, each WMA Member Board attempts to partially recover the additional costs incurred by the Board resulting from additional flows consented under Byelaw 3. This is done by requiring a Surface Water Development Contribution (SWDC), calculated in line with the Board's Charging Policy.</li> </ul> <p>It is highly probable that the Board would incur financial costs should there be an additional total volume of water entering the district as a result of the authorised project. I am concerned that these costs may be beyond the 'protective works' highlighted in paragraph 72 of the draft DCO. I would therefore appreciate assurances that provisions of byelaws 3 and 28 are considered and included within the 'reasonable requirements' of paragraph 71 (3c). Furthermore please note that as the Board regulates and maintains watercourses (as opposed to owning them), article 15(3) of the draft DCO does not apply.</p>	<p>WMA requested a slight modification to the definition of 'specified work' within paragraph 70(3)(c) so that it reads as follows:</p> <p><i>"affect any drainage work or the <b>total volume</b> or volumetric rate of flow of water in or flowing to or from any drainage work;"</i></p> <p>The WMA confirmed that <i>'with this alteration, together with your assurances of the broad scope of 71 and 72 would give us confidence that the provisions of these specific Byelaws are safeguarded within Schedule 17.'</i></p> <p>The Applicant has adopted the proposed change and this will be reflected in the updated draft DCO submitted at Deadline 7.</p>

## 1.11 Colin King REP6-059

Summary of Submission	Applicant's Comments
<b>Comments on response to Further Written Questions</b>	
<p><u>2.9.3.3. Topography:</u> Proposed substation and National Grid substation extension sites: Applicant submitted Appendix 9.1 -in response to Q2.9.3.3 A1 plans (Figures 1a, 1b Scenario 1 and Figures 2a, 2b for Scenario 2) are provided, representing both the elevation and slope of the landform for both Scenario 1 and Scenario 2. The elevation plans (Figures 1a and 2a) illustrate the difference in elevation of the Ordnance Survey contours across the local area. The slope plans (Figures 1b and 2b) illustrate the steepness of the slopes, that is the relative distance between the Ordnance Survey contours, across the local area. Figure 1a and Figure 2a show the location of the three cross sections requested. The cross sections are shown on two separate A1 sheets, one representing Scenario 1 (Figure 1c) and the other Scenario 2 (Figure 2c). Cross Section 1 extends from St Andrews Lane to Ivy Todd Farm, passing through the National Grid substation extension. Cross Section 2 extends from Viewpoint 7 to the onshore project substation. Cross Section 3 extends from Viewpoint 3 to the onshore project substation.</p> <p><u>In response</u> - I found the cross-sections of the land form provided by the applicant of little use. I have taken the cross- section diagrams and added a 19m converter hall, a level ground, line of view, a viewpoint at 1.5m, and mitigating trees where applicable, using the appropriate scales. This again shows a discrepancy when compared to the photo montages. After completing the diagrams, which again appeared different to what I expected, I realised they are not drawn to scale. The applicant used one rate of scale for distance, and another for the height. The result is a diagram compressed in length, and overly high. This makes the line of view falsely steep, and the point it intersects the hall unrealistically high. If the diagram had been prepared in scale, it would be much longer, the line of view much shallower, and most of the converter hall would be visible, as I have always suspected. As these cross-sections are another poor tool, it would seem the applicant does not consider mitigating the Necton substation properly, a serious consideration.</p>	<p>The Applicant has revised the cross sections to ensure the horizontal scale matches the vertical scale. The emphasis of the horizontal scale over the vertical is commonly used to ensure long cross sections can fit on a single page to aid viewing. The size of the page has been increased to A0 so that the full length of each of the cross sections can be accommodated whilst showing the same vertical and horizontal scales. The updated cross sections are included in the Updated Appendix 9.1 to the Applicant's response to the ExA's third round of written questions [ExA.WQ-3.D7.V1], submitted at Deadline 7.</p>

Summary of Submission	Applicant's Comments
<p><u>2.12.2.3. Respond to the request [REP3-030] to include Ivy Todd Farm as an NSR.</u> The Applicant refers to ES Chapter 25 Noise and Vibration [APP-238] and ES Figure 25.2 [APP-470] which shows noise sensitive receptors used in the assessment, which includes SSR2 at Ivy Todd Farm. These locations and methodology were discussed and agreed in consultation with Breckland Council and Norfolk County Council throughout the Evidence Plan Process with the Expert Topic Group, and in the relevant Statement of Common Ground [REP2-039 and REP2-050].</p> <p><u>In response</u> - The applicant states SSR2 is at Ivy Todd Farm. It is at Lodge Cottage, but it is close enough. I have always been aware that the Ivy Todd Farm house is considered a noise sensitive receptor, but the farm yard and connected land is not. I have requested that our farm yard and land, at 500m from the substation, be regarded as noise sensitive, to maintain the options of farm diversification, which has long been recognized necessary for small farms.</p>	<p>The definition of a Noise Sensitive Receptor was clarified in Section 2 of the Joint Position Statement: Noise Sensitive Receptors submitted at Deadline 6 [REP6-022], where Table 1 presents definitions and categorisation of sensitive receptors. This table will be captured in a future update to the OCoCP. Within this table, noise receptors which have been categorised as negligible sensitivity (where noise is not expected to be detrimental) includes subgroups such as warehouses, light industry, car parks, cycling routes (including rural roads), and agricultural land. In accordance with this table the farm yard and connected land fall under the classification agricultural land and as such as considered negligible sensitivity.</p>
<p><u>2.15.0.10. Enhancement/reinstatement of watercourses [Requirement 25 of DCO].</u> Section 2.1.3 of clarification note [REP2-028] discusses the principle of ecological enhancement/reinstatement of 'water bodies directly affected by the proposed project' (potentially including bank reprofiling, narrowing of over-wide channels, reinstatement of suitable bed substrate, installation of sediment traps, in-channel habitat enhancements and marginal planting).</p> <p><u>In response</u> - Concerned that the Wissey tributary that runs between the National Grid site and Vattenfall's site, is being overlooked in the enhancement details for each water crossing. As this is the only 400kv crossing, are there any details in the documents describing this crossing and the expected end result? Has Norfolk County Council got enough design detail on this crossing, as their DPD DM2 regards river valleys as extra sensitive.</p>	<p>Details of watercourse crossings are provided in ES Appendix 20.4 Watercourse Crossing Schedule [APP-589] and includes the watercourse in the Upper Wissey catchment crossed by the 400kV cable route [ID: 124(2)(2)/124(2)(3) dependent on the scenario].</p> <p>As referred to in the Applicant's comments on the Environment Agency's response to Q2.15.02 [REP6-014]: A visual inspection and photographic survey will be undertaken at each crossing location in advance of construction to ensure that there is an accurate record of baseline conditions geomorphological (physical habitat) and ecological at each crossing location. This survey will be detailed in the site specific watercourse crossings plan which are secured through Requirement 25 and detailed in the OCoCP. An updated OCoCP has been submitted at Deadline 5 which captures this further detail in Section 11.</p> <p>Details of the enhancements that are appropriate for each crossing location will be set out in a site specific watercourse crossing plan, secured by dDCO Requirement 25. The plans will outline proposals for the scope of the enhancements that can be realistically achieved at each location, taking into account the prevailing geomorphological and ecological characteristics of</p>

Summary of Submission	Applicant's Comments
	<p>each reach (as determined by the pre-construction survey) and constraints on channel capacity and flow conveyance. These proposals will be discussed and agreed with the relevant authority (EA, IDB or LLFA) in advance of construction.</p>
<p><u>2.16.1.3. Decommissioning:</u> Interested Parties are invited to set out any comments they may have on the way decommissioning would be addressed. The Project Description [APP-218] sets out the future processes, which would be in accordance with best practice, rules and legislation of the time. Requirement 14 (offshore) and Requirement 29 (onshore) secure future decommissioning plans.</p> <p><u>In response</u> - Ivy Todd could be more vulnerable after decommissioning, with regard to water flow regulation through Ivy Todd. Any soil disturbance on the site, will affect the water flow.</p>	<p>Future decommissioning plans are secured through the obligations within the DCO, including Requirement 29 which provides as follows:</p> <p><i>29 (1) Within six months of permanent cessation of commercial operation of the onshore transmission works an onshore decommissioning plan must be submitted to the relevant planning authority for approval. (2) The decommissioning plan must be implemented as approved..."</i></p>

## 1.12 Jenny Smedley REP6-060

Summary of Submission	Applicant's Comments
<b>Comments on response to Further Written Questions</b>	
<p>Applicant response to Q 2.9.1.2 – 1. The Applicant has never stated that the proposed would not be visible from Necton or Ivy Todd nor that the views of private individuals have not been considered. The key findings of the LVIA are that effects would be limited insofar as only localised parts of the surrounding settlements would be affected and</p>	<p>1. When read in context, the sentence “<i>We have viewpoints from Necton that show that visibility is very limited...</i>” accepts that there will be visibility but that it will be limited in geographical extents. As recorded in the LVIA, the assessment relating to Viewpoint 8: Chapel Lane and Viewpoint 9: St Andrews Lane, explicitly sets out the potential for visibility to arise from the rear of the</p>

### Summary of Submission

where visibility would occur, the proportion of the onshore project substation and National Grid substation extension that would be visible, would be limited. As set out in the ES Chapter 29 [APP-242, Table 29.13, Viewpoints VP8, VP9, VP10] the assessment considers the views of residents in Necton, Ivy Todd and Holme Hale. Using the visualisations accurately produced to SNH standards and making the assessment on site, both at the specific viewpoints and surrounding areas, an assessment has been drawn based on the level of change that residents would experience as a result of these additional developments in their local area. While the viewpoints are located in the public domain, they have been used to represent the views of residents in both public and private spaces.

2. GLVIA3 sets out the requirement that settlements should be considered as principal visual receptors and residents as visual receptors in the visual assessment of a proposed development. In the case of Necton, the eastern edge of the village is most likely to be affected as this is the closest edge to the proposed development and, beyond this, the screening effect of the houses and the gentle fall in landform prevent visibility from extending further into the village. The assessment has, therefore, focused on the potential effects experienced between Chapel Road and St. Andrews Lane, as represented by Viewpoint 8 and Viewpoint 9. The potential visual effect on people in the public domain, that is driving along or walking in the public streets, would be limited owing to either full or partial screening by intervening houses, vegetation and/or landform. Viewpoint 8 and Viewpoint 9 have, therefore, been used to represent the potential visual impact on residents on the eastern side of St Andrews Lane. Here, the rear facades of residents are orientated towards the proposed development. In the assessment, consideration was given to how their views would be affected by the proposed development, taking into account the potentially fuller extents of visibility from upper floors. A similar approach was taken in respect of the hamlet of Ivy Todd, whereby the enclosed nature of the settlement by landform and tree cover means that views from much of the public domain would be fully or partially screened but that it was recognised that the more open and elevated location of Lodge Cottage could potentially lead to the onshore project substation being more readily visible.

### Applicant's Comments

properties on this eastern periphery of the settlement. The comment made in the hearing "*...that we don't actually see the substation from the settlement of Necton*" is with reference to the actual settlement; i.e. the publicly accessible streets and other spaces as opposed to the private internal and external spaces associated with the properties on the eastern periphery.

The closer proximity of Ivy Todd does not necessarily mean that residents or visitors are 'obviously' going to see more. The reality is that fewer residents will be affected owing to the extent of existing tree cover in the village combined with the low-lying location of many properties, especially those adjacent to the watercourse.

Although the proposed development may be visible from more distant receptors, it does not necessarily follow that the effects of that visibility would give rise to a significant effect. The potential for a significant effect to arise at Ashill is unlikely owing to the separation distance from the proposed development of just over 5km, the relatively small proportion of the wider context that will be visible, the existing influence of the closer range and the absence of any formal or informal viewpoints and/or scenic landscape designations.

2. It is standard practice for the assessment of effects on residential visual amenity to be carried out from the nearest publicly available or accessible vantage point. This reflects the private nature of homes and associated garden grounds. In respect of the properties on the eastern side of Necton, site work was carried out on St Andrews Lane and Chapel Road. In respect of the issue of views from upper floor windows, GLVIA 3 makes the distinction between the higher susceptibility that should be attributed to views from rooms occupied in daylight or waking hours, compared to those which are not. These are typically, but not always, ground floor rooms, with upper floor rooms typically used as bedrooms or spare rooms.

Of the 16 properties on the eastern side of St Andrews Lane, six are bungalows and ten are two-storey. The four properties at the northern end (between 56 and 59m AOD) and the two at the southern end (between 53.5

Summary of Submission	Applicant's Comments
<p><u>In response</u> – 1. REP6-60 responds by cross referencing Recording of Issue Specific Hearing on Onshore effects including the draft Development Consent Order Part 3 - 21 January 2020 (link below) from 01.21.07 to 01.21.15. The statement is made that ‘We will see it from ground level in our property’s garden, and possibly from our windows (hard to tell) which while on the outskirts of the village in St Andrews Lane, is still within the boundary of the settlement. Comments are made regarding visual impact to Ivy Todd, and the visual extent of both Vanguard and Boreas to the wider area (as far as Ashill Common 5km away. Comments on request by NSAG for the Planning Inspectorate to visit the Common, and the photographic evidence already submitted. 2. As stated, our property sits on St Andrew’s Lane, along with many other residents’ properties. The Applicant has never visited any of these residences, and cannot possibly say what will be seen, and any ‘consideration’ by the Application is yet to be experienced. They speak of “potentially fuller extents of visibility from upper floors”. There is nothing potential about it as they would know with certainty had they ever visited the residences. It was also noted that the Applicant doesn’t reference the National Grid Infrastructure connected to their development in their comments, which can be seen from far and wide in both Necton and from miles away.</p>	<p>and 54m AOD) are bungalows and therefore do not have upper floors from which to experience more elevated views. Some properties have relatively dense rear garden vegetation while others appear to be more exposed with open views across the adjacent fields. The ten two-storey semi-detached properties in between the bungalows (between 54m and 56m AOD) will experience more elevated views from their upper floors. A visualisation of the model generated using the estimated position and height of a viewer looking from the first floor of the most elevated of the ten two-storey properties shows an incremental increase in the extent to which the proposed development would be visible compared to the extent of visibility shown in respect of Viewpoint 9: St Andrews Lane.</p>



### 1.13 Cawston Residents and Businesses REP6-058, REP6-061 to REP6-070

Summary of Submission	Applicant's Comments
<b>Cawston Traffic</b>	
<p>REP6-058 and REP6-61 to REP6-070 are representation from residents and businesses in Cawston Village who are objecting to the Highways Intervention Scheme and the routing of HGVs through the village.</p>	<p>The Highways Intervention Scheme s considered sufficient to mitigate potential traffic impacts from the project alone and cumulatively with Hornsea Project Three.</p> <p>NCC have indicated that following the Applicants acceptance of the Road Safety Audit recommendations no further amendments are required to the Highway Intervention Scheme and they will be completing the RSA log to finalise the scheme.</p>

## 2 Applicant's Comments on Other Submissions

6. This section contains the Applicant's comments on submissions in lieu of attendance at Issue Specific Hearing 5.

## 2.1 Oulton Parish Council EV9-005 to EV9-009

Summary of Submission	Applicant's Comments
<b>Submission in lieu of attendance at Issue Specific Hearing 5</b>	
<p><b>Comments on Agenda Item 6(b)</b></p> <p><b>Noise and Vibration at The Old Railway Gatehouse (ORG)</b></p> <p>1) The Applicant has submitted documents re: noise and vibration for Norfolk Boreas, but Oulton Parish Council note that these documents <u>exclude any specific assessment</u> for The Old Railway Gatehouse as part of either scenarios 1 or 2.</p> <p>It should be noted that a noise and vibration document was submitted by Norfolk <u>Vanguard</u> for this location (The Old Railway Gatehouse) in respect of the cumulative impact of traffic from Hornsea Three Main Construction Compound in combination with Norfolk Vanguard's Cable Logistics Area and MA7 on Link 68 (**see attachment).</p> <p>Oulton PC considers that the above document should be included <u>as part of the DCO for Norfolk Boreas</u> scenarios 1 and 2, especially in respect to the so-called 'optional' mitigation measures that should be offered to the residents of the ORG.</p> <p>2) OPC commends to the attention of the ExA the first two attachments below, being a detailed expression of the concerns of the Parish Council regarding significant flaws in the results of the original monitoring exercise, and the potential for severe adverse impacts on the residents of the ORG, arising from the Examination processes of both Hornsea Project Three and Norfolk Vanguard. <u>These concerns are still outstanding.</u></p> <p>3) In particular, OPC would like to remind the ExA that these Applicants have adopted wholesale (but with reservations regarding 'optional' mitigation?) the flawed results of a one-week monitoring exercise on noise and vibration conducted by <u>Orsted</u> 15 - 21 October 2018. The current Applicants have not seen fit - even in the face of sustained concerns expressed by the residents, by the Parish Council, and by Broadland District Council - to conduct their own assessment to address the valid concerns of all interested parties.</p> <p>4) Finally, the Parish Council is obliged to draw the ExA's attention to a statement that is made, and repeated twice more, in the third document attached below: Norfolk</p>	<p>1. The site specific assessment referred to was submitted to the Norfolk Boreas examination as Appendix 1 to the Norfolk Boreas Broadland District Council Statement of Common Ground, first submitted at Deadline 2 [REP2-047]. This document has now also been referred to in Schedule 18, Part 1 of the dDCO submitted at Deadline 7.</p> <p>This assessment was undertaken by Norfolk Vanguard to consider the noise, vibration and air quality effects at the Old Railway Gatehouse at Oulton, resulting from Norfolk Vanguard's construction traffic and cumulatively with Hornsea Project Three. As the same approach and construction methodology would be applied this assessment is also considered applicable to Norfolk Boreas.</p> <p>2. and 3. An assessment was undertaken by Orsted for Hornsea Project Three Offshore Wind Farm for traffic movements for the proposed scheme at the Old Railway Gatehouse at Oulton (Document Reference: Hornsea Project Three Offshore Wind Farm – Appendix 24 to Deadline 7 submission – Construction Traffic Noise Assessment Clarification Note, dated 14th March 2019) and has been submitted to the Norfolk Boreas examination at Deadline 7 [ExA.AS-4.D7.V1]. Consideration was also given to the cumulative impacts from the Norfolk Vanguard Scheme. The findings from the Hornsea Project Three report were reviewed and considered during the Norfolk Vanguard examination.</p> <p>In response to a request by Broadland District Council, baseline sound levels were measured at The Old Railway Gatehouse during 15 to 21 October 2018 by the consultants (RPS) assessing the noise and vibration effects of Hornsea Project Three. The findings were reported in the document referred to above for Hornsea Project Three [ExA.AS-4.D7.V1].</p>

Summary of Submission	Applicant's Comments
<p>Vanguard's Position Statement on Noise Mitigation Measures at The Old Railway Gatehouse. At point 8 (p.2) the following statement appears:</p> <p><i>"The Applicant is in the process of discussing these optional mitigation measures with the owner of The Old Railway Gatehouse and a further update will be given at Deadline 8. "</i></p> <p>This statement is repeated at Point 15, and again at point 27 in Appendix 1. Clearly the intentions to encourage the impression of appropriate engagement with a significantly affected stakeholder. In fact this is absolutely not the case. The Applicant for Norfolk Vanguard and Norfolk Boreas has at no time approached in any way the residents of the Old Railway Gatehouse, to discuss either their concerns or their need for mitigation. The residents of the Gatehouse re-confirmed this fact on 15th March 2020.</p>	<p>The measurement period is considered sufficient in duration to determine typical existing weekday traffic flow conditions and to enable representative <math>L_{Aeq,T}</math>, <math>L_{10,T}</math>, <math>L_{90,T}</math> and <math>L_{AFmax}</math> indices to be gathered. This approach for noise measurements is considered representative; is location specific; and determined the existing soundscape including measured noise levels from vehicular movements (including HGV passbys) at the closest sensitive receptor location to the carriageway along Link 75.</p> <p>From the measured baseline data presented in the subsequent Hornsea Project Three assessment, the measured existing noise levels at the Old Railway Gatehouse location were used to determine potential noise impact magnitude and significance from proposed mitigation measures. The predicted noise levels were based on the proposed flows for Hornsea Project Three and cumulatively with Norfolk Vanguard.</p> <p>Mitigation was proposed for potential cumulative impacts from road traffic in the form of a cap on the maximum number of daily HGV movements, a temporary speed restriction, regarding the road surface in proximity to the Old Railway Gatehouse, incorporation of passing places along The Street and priority warning signs in proximity to The Old Railway Gatehouse. With these mitigation measures in place residual impacts related to noise and vibration were minor adverse, and not significant based on the agreed Environment Impact Assessment criteria. Norfolk Boreas has committed to adopting these mitigation measures which are captured within Section 4.3.3 of the Outline Traffic Management Plan (OTMP) [REP5-025] and secured through DCO Requirement 21.</p> <p>4. During the Norfolk Vanguard examination the Norfolk Vanguard project team did contact the resident of Old Railway Gatehouse including discussions on the proposed additional measures to be undertaken at the property. Phone calls were held with the resident in April and May 2019,</p>

Summary of Submission	Applicant's Comments
	<p>both of which were followed up with email correspondence (copies of email correspondence can be provided if necessary).</p> <p>Subsequently both Norfolk Vanguard and Norfolk Boreas have committed to adopting these measures should the resident wish to take them forward.</p> <p>No further contact has been made by Norfolk Boreas as the measures proposed are as discussed for Norfolk Vanguard. The Applicant will look to engage further with the owner with a view of progressing these matters post-consent when further design details are available.</p>

## 2.2 Cawston Parish Council EV9-010

Summary of Submission	Applicant's Comments
<b>Submission in lieu of attendance at Issue Specific Hearing 5</b>	
<p>Firstly, we repeat our <b>assessment</b> that the B1145 through Cawston is completely unsuitable for the construction traffic proposed by the wind farm companies. No amount of selective manipulation of figures, averaging and smoothing can hide the basic facts:</p> <ul style="list-style-type: none"> <li>At various points the road width is too narrow for larger vehicles to pass parked cars without overhanging, or mounting the narrow pavement. This is basic arithmetic.</li> <li>This has been observed at every one of the ASIs carried out by the three projects (Hornsea 3, Norfolk Vanguard and Boreas).</li> <li>It is also the experience of residents on a daily basis.</li> <li>Other pinch points are found all along the B1145 from Salle to the B1149, for example at the Salle Beck bends and Marriotts Way bridge to the west of Cawston, near to Aspen Vale and then close to the B1149 roundabout to the east.</li> <li>The effect of these points will be convoys of traffic arriving in the village centre from both directions, causing queues of stationary vehicles belching out fumes.</li> </ul>	<p>Please refer to the Applicant's response to the ExA's third written questions, in particular Q3.14.1.4.</p> <p>A key design principle of the HIS is to provide adequate road space for HGVs to traverse the High Street without the requirement to mount or project over the pavement.</p> <p>These principles are captured in the HIS design that was submitted for RSA [REP4-016] which introduces single way HGV working through the High Street, ensuring there is enough adequate road space for HGVs to traverse without the requirement to mount or project over the pavement. For the sections of the HIS where two-way flows are encouraged there are two distinct HGV pinch points at the eastern and western entry to the High Street where there would be a risk of HGVs mounting or oversailing the pavement. To mitigate this risk, the HIS adopts the design principles of providing hazard warning signs depicting oncoming vehicles in the middle of the road, supplemented by UK standard stopping sight distance and a</p>

Summary of Submission	Applicant's Comments
<p>Returning to the latest Highway Intervention Scheme, we wait to hear the Norfolk CC verdict on the Road Safety Audit, but we consider it a clear failure as the Audit confirmed all of our observations while the Applicant's comments do not address the core issues.</p> <p>We also rely on Broadland DC to assess the developments in noise, vibration and air quality from this revised scheme should it ever become accepted by NCC.</p> <p>We have had a closer look at the baseline figures used in Table 1 and Table 2 in the Applicant's Evaluation of Perceived Pedestrian Risk.</p> <ul style="list-style-type: none"> <li>• This uses a 12 hour average of 207 HGVs.</li> <li>• The definition used here for "HGV" is over 7.5 tonnes, based on the ARX classification scheme. This has 12 classes of vehicle, but here we are concerned with classes 4 to 10, representing a wide range of "HGV".</li> <li>• ARX define classes 4, 5 and 6 as "medium", with 7 to 10 as "Heavy". We suggest that key points to consider here are weight and the number of axles, which will cause more noise, vibration and damage as they increase.</li> <li>• Analysis of the average baseline of 207 shows that it is made up of 185 in Class 4 (THE SMALLEST) and 22 others, of which only 9 are in the Heavy groups,7-10.</li> <li>• ALL OF THE APPLICANTS VEHICLES WILL BE IN CLASSES 7 TO 10 – "HEAVY". THIS IS NOT A LIKE FOR LIKE COMPARISON, WHATEVER THE THEORETICAL DEFINITIONS MIGHT SAY.</li> </ul> <p>We will submit an alternative view of Tables 1 &amp; 2 in our detailed submission.</p> <p>Talking of perceptions, last weekend we carried out a survey of pedestrians and residents to gauge their views. These are REAL PEOPLE, not theoretical "Receptors" in a model. We asked them to give us their comments about the perceived risk plus their experiences in current traffic conditions, and will report the detailed results in our written submission.</p> <p>With regard to item 3b on the Agenda, we do not feel that discussion should be limited to the 5 options produced by the Applicant. Given the major issues raised not only in Cawston but in other parishes as well, we suggest that "Alternatives" should start from "go back to the drawing board and find a more appropriate route", and then include all the wider possibilities.</p>	<p>reduced speed limit to enable HGV drivers to safely react to the highway environment and 'yield' to oncoming HGVs as required.</p> <p>The HIS design has been informed by a full topographical survey and demonstrates the swept path simulation of the largest standard UK standard HGV; a 44t articulated tractor and semi-trailer, 2.55 wide trailer, 2.49 cab width and 0.25 wide wing mirrors.</p> <p>Please refer to the Applicant's comments on the Cawston Parish Council Deadline 6 submission [REP6-042].</p> <p><b><u>Noise vibration and air quality</u></b></p> <p>The Applicant is undertaking an assessment of the potential noise vibration and air quality effects of the revised HIS, this will be submitted at Deadline 8..</p>












## Appendix 1 ARX Classifications



# ARX

ARX is a modification of AustRoads94. It removes class 12, moves all other classes up by one, and inserts a cycle class as class 1.

- **Units:** Metric (m)
- **Car class:** 2
- **Unclassifiable vehicle class:** 13

Axles	Groups	Description	Class		Parameters	Dominant Vehicle	Aggregate
2	1 or 2	Very Short - Bicycle or Motorcycle	MC	1	$d(1) < 1.7\text{m} \ \& \ \text{axles}=2$		1 (Light)
2	1 or 2	Short - Sedan, Wagon, 4WD, Utility, Light Van	SV	2	$d(1) \geq 1.7\text{m}, \ d(1) \leq 3.2\text{m} \ \& \ \text{axles}=2$		
3, 4 or 5	3	Short Towing - Trailer, Caravan, Boat, etc.	SVT	3	$\text{groups}=3, \ d(1) \geq 2.1\text{m}, \ d(1) \leq 3.2\text{m}, \ d(2) \geq 2.1\text{m} \ \& \ \text{axles}=3,4,5$		
2	2	Two axle truck or Bus	TB2	4	$d(1) > 3.2\text{m} \ \& \ \text{axles}=2$		2 (Medium)
3	2	Three axle truck or Bus	TB3	5	$\text{axles}=3 \ \& \ \text{groups}=2$		
>3	2	Four axle truck	T4	6	$\text{axles} > 3 \ \& \ \text{groups}=2$		
3	3	Three axle articulated vehicle or Rigid vehicle and trailer	ART3	7	$d(1) > 3.2\text{m}, \ \text{axles}=3 \ \& \ \text{groups}=3$		3 (Heavy)
4	>2	Four axle articulated vehicle or Rigid vehicle and trailer	ART4	8	$d(2) < 2.1\text{m} \ \text{or} \ d(1) < 2.1\text{m} \ \text{or} \ d(1) > 3.2\text{m} \ \& \ \text{axles} = 4 \ \& \ \text{groups} > 2$		
5	>2	Five axle articulated vehicle or Rigid vehicle and trailer	ART5	9	$d(2) < 2.1\text{m} \ \text{or} \ d(1) < 2.1\text{m} \ \text{or} \ d(1) > 3.2\text{m} \ \& \ \text{axles}=5 \ \& \ \text{groups} > 2$		
>=6	>2	Six (or more) axle articulated vehicle or Rigid vehicle and trailer	ART6	10	$\text{axles}=6 \ \& \ \text{groups} > 2 \ \text{or} \ \text{axles} > 6 \ \& \ \text{groups}=3$		
>6	4	B-Double or Heavy truck and trailer	BD	11	$\text{groups}=4 \ \& \ \text{axles} > 6$		
>6	>=5	Double or triple road train or Heavy truck and two (or more) trailers	DRT	12	$\text{groups} \geq 5 \ \& \ \text{axles} > 6$	