

Norfolk Boreas Offshore Wind Farm

Statement of Common Ground

North Norfolk District Council

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Glossary of Acronyms

AMP	Access Management Plan
CIA	Cumulative Impact Assessment
CoCP	Code of Construction Practice
CWS	County Wildlife Sites
DCO	Development Consent Order
EclA	Ecological Impact Assessment
EIA	Environmental Impact Assessment
EMP	Ecological Management Plan
EPP	Evidence Plan Process
ES	Environmental Statement
ETG	Expert Topic Group
GCN	Great crested newt
HIA	Health Impact Assessment
HRA	Habitats Regulations Assessment
HDD	Horizontal Directional Drilling
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
LVIA	Landscape and Visual Impact Assessment
NNDC	North Norfolk District Council
OAMP	Outline Access Management Plan
OCoCP	Outline Code of Construction Practice
OLEMS	Outline Landscape Ecological Management Strategy
OTMP	Outline Traffic Management Plan
OTP	Outline Travel Plan
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground
TMP	Traffic Management Plan
TP	Travel Plan
WSI	Written Scheme of Investigation

Glossary of Terminology

Ducts	A duct is a length of underground piping, which is used to house electrical and communications cables
Evidence Plan Process	A voluntary consultation process with specialist stakeholders to agree the approach to the EIA and information to support the HRA
Landfall	Where the offshore cables come ashore at Happisburgh South
Mobilisation area	Areas approx. 100 x 100m used as access points to the running track for duct installation. Required to store equipment and provide welfare facilities. Located adjacent to the onshore cable route, accessible from local highways network suitable for the delivery of heavy and oversized materials and equipment.
Necton National Grid substation	The grid connection location for Norfolk Boreas and Norfolk Vanguard.
Norfolk Boreas	The Norfolk Boreas Offshore Wind Farm project.
Norfolk Boreas Limited	The Applicant undertaking the development of the Norfolk Boreas Offshore Wind Farm project (an affiliate company of VWPL).
Norfolk Vanguard	Norfolk Vanguard Offshore Wind Farm, sister project of Norfolk Boreas.
Onshore cable route	The up to 35m working width within a 45m wide corridor which will contain the buried export cables as well as the temporary running track, topsoil storage and excavated material during construction.
Onshore project substation	A compound containing electrical equipment to enable connection to the National Grid. The substation will convert the exported power from HVDC to HVAC, to 400kV (grid voltage). This also contains equipment to help maintain stable grid voltage.
Running Track	The track along the onshore cable route which the construction traffic would use to access work areas.
The Applicant	Norfolk Boreas Limited
Trenchless crossing zone (e.g. HDD)	Areas within the onshore cable route which will house trenchless crossing entry and exit points.
Workfront	A length of onshore cable route within which duct installation works will occur, approximately 150m.

1 INTRODUCTION

1. This Statement of Common Ground (SoCG) has been prepared between North Norfolk District Council and Norfolk Boreas Limited (hereafter the Applicant) to set out the areas of agreement or disagreement in relation to the Development Consent Order (DCO) application for the Norfolk Boreas Offshore Wind Farm (hereafter ‘the project’).
2. This SoCG comprises an agreement log which has been structured to reflect the topics of interest to North Norfolk District Council with regard to the Norfolk Boreas DCO application (hereafter ‘the Application’). The agreement logs (section 2) outline all topic specific matters agreed and not agreed between North Norfolk District Council and the Applicant.
3. The Applicant has had regard to the Guidance for the examination of applications for development consent (Department for Communities and Local Government, 2015) when compiling this SoCG. Topics that are not agreed were the subject of ongoing discussion wherever possible to resolve or refine the extent of disagreement between the parties.

1.1 The Development

4. The Application is for the development of the Norfolk Boreas Offshore Wind Farm and associated infrastructure. A full description of the project can be found in Chapter 5 Project Description of the Environmental Statement (document reference 6.1.5 of the Application, APP-218).
5. The Application is seeking consent for the following two alternative development scenarios:
 - **Scenario 1** – Norfolk Vanguard proceeds to construction and installs ducts and other shared enabling works for Norfolk Boreas.
 - **Scenario 2** – Norfolk Vanguard does not proceed to construction and Norfolk Boreas proceeds alone. Norfolk Boreas undertakes all works required as an independent project.
6. Where a topic of agreement is specific to a scenario this is identified in the Agreement Logs for each subject area, otherwise the agreement applies to both scenarios.

1.2 Consultation with North Norfolk District Council

7. This section briefly summarises the consultation that the Applicant has had with North Norfolk District Council. For further information on the consultation process please see the Consultation Report (document reference 5.1 of the Application, APP-027).

1.2.1 Pre-Application

8. The Applicant has engaged with North Norfolk District Council on the project during the pre-application process, both in terms of informal non-statutory engagement and formal consultation carried out pursuant to Section 42 of the Planning Act 2008.
9. During formal (Section 42) consultation, Norfolk District Council provided comments on the Preliminary Environmental Information Report (PEIR) by way of letter (by email) dated 6th December 2018. Please refer to Consultation Report Appendix 24.01 of the (document reference 5.1.24.01 of the Application, APP-180).
10. Further to the statutory Section 42 consultation, consultation was undertaken with North Norfolk District Council (NNDC) through the Evidence Plan Process (EPP). For further details on this consultation see sections 9.5, 12.5, 13.5, 18.5, 21.5 and 21.6 of the Consultation Report (document 5.1 of the Application, APP-027).
11. Table 1 summarises the key consultation undertaken between the parties during the pre-application phase.

Table 1 Summary of pre-application consultation with North Norfolk District Council

Date	Contact Type	Topic
Pre-Application		
January / February 2018	Emails from the Applicant	Issue of Method Statements and Agreement Logs for relevant Environmental Impact Assessment (EIA) topics.
November 2018	Section 42 consultation	NNDC response to section 42 consultation on the PEIR. Appendix 24.1 of the Consultation Report (document reference 5.1.24.1 of the Application, APP-180).
January 2019	Emails from the Applicant	Offering any topic specific EPP meetings for relevant onshore topics, it was concluded none were required except for topics identified below.
February 2019	EPP Meeting (conference call)	Onshore Ecology and Ornithology meeting to discuss section 42 responses and approach to Environmental Statement (minutes in document 5.1.28.1 of the Application, APP-192). NNDC invited not unable to attended but minutes and updated agreement log provided post meeting
	EPP Meeting (conference call)	Marine Geology, Oceanography and Physical process meeting to discuss section 42 responses and approach to Environmental Statement (minutes in document 5.1.28.1 of the Application, APP-192). NNDC invited not unable to attended but minutes and updated agreement log provided post meeting.
July 2019	Email from the Applicant	Providing early sight of relevant chapters of the Environmental Statement.

12. Consultation was also undertaken with NNDC Council on matters relevant to both projects by Norfolk Vanguard and has been taken in account by Norfolk Boreas. Details in Norfolk Vanguard Statement of Common Ground –Norfolk County Council (Norfolk Vanguard examination document REP9-047).

1.2.2 Post-Application

13. The Applicant hosted a meeting with Local Authorities including NNDC on the 23rd July 2019. The Applicant presented their suggested approach to SOCG's and the meeting provided an open forum for the attending authorities to provide their opinions.
14. Table 2 summarises the key consultation undertaken between the parties during the post-application phase to date.

Table 2 Summary of post-application consultation with NNDC

Date	Contact Type	Topic
Post-Application		
23 July 2019	Meeting	Project update and agreement on approach to SoCG's.
9 September 2019	Email from NNDC	Providing a copy of text from Section 56 response
23 September	Email from Applicant	Providing draft SoCG for review
4 December 2019	Email from NNDC	Providing SoCG with updated positions for deadline 2
21 February 2020	Call NNDC and Applicant	Joint call with Norfolk Vanguard to discuss Seceraty of State Letter and Noise Sensitive Receptors
4 March 2020	Call NNDC and Applicant	Review of SoCG and position statement on Noise Sensitive Receptors
19 March 2020	Call NNDC and Applicant	Call to discuss securing 10 year replacement planting, Church Road, Colby and Requirements 15 and 16

15. This SoCG has been updated throughout the examination process. This is the final version is for submission at Deadline 10 taking into account of information provided by North Norfolk District Council throughout the examination and captures the final positions of both parties.

2 STATEMENT OF COMMON GROUND

16. Section 2.1 to section 2.11 below outline the subject areas of relevance to North Norfolk District Council regarding the Application. Each section includes an Agreement Log highlighting the current position of both the Applicant and North Norfolk District Council with regard to each topic for agreement.
17. In order to easily identify whether a matter is “agreed”, “under discussion” or “not agreed”, a colour coding system of green, yellow and orange, respectively, is used in the “final position” column to represent the respective status of discussions.

2.1 Project-wide considerations

18. Table 3 provides the final position for project-wide considerations of the Applicant and North Norfolk District Council.

Table 3 Agreement Log -Project-wide considerations

Norfolk Boreas Limited position	North Norfolk District Council position	Final position
Policy and legislation		
The principle of offshore wind is supported, as Norfolk Boreas accords with national renewable energy targets and objectives. This was noted in the NNDC Section 42 response in December 2017.	North Norfolk District Council is fully supportive of the principle of renewable energy development in helping to tackle the challenges faced by climate change. NNDC recognises the national importance of having a balanced supply of electrical generation including increasing renewable energy supplies from offshore turbines in helping decarbonise the UK’s energy sector.	Agreed
Site selection		
The adoption of the long HDD at the landfall is considered the preferred option. This was noted in the NNDC Section 42 response in December 2017.	NNDC are fully supportive of the use of the HDD long drill to bring cables onshore as part of a HVDC transmission system.	Agreed
The principles adopted in undertaking the site selection outlined in Chapter 4 Site Selection and Assessment of Alternatives (document reference 6.1.4 of the Application, APP-217) for Norfolk Boreas are appropriate and robust.	Whilst the District Council were not in a position to directly influence the location of a grid connection offer made to Vattenfall by National Grid Electricity Transmission Limited, once the grid offer location was known and landfall options were narrowed down to three locations, NNDC worked with Vattenfall to identify the most appropriate locations which, up until after the Norfolk Vanguard PEIR stage, involved the prospect of cable relay stations within North Norfolk. Advice was given as to the favoured location with a view to limiting the potential adverse impacts from cable relay stations as well as advice provided in relation to the most	Agreed
The search areas used for the site selection process and the methodology used for refining these areas is considered robust and appropriate.		

Norfolk Boreas Limited position	North Norfolk District Council position	Final position
	<p>appropriate method to bring cables onshore. At the Norfolk Boreas PEIR stage there was the commitment made to use HVDC and the long HDD option to bring cables onshore.</p> <p>The only area where the District Council would question the grid offer choices made by National Grid Electricity Transmission Limited is the consequence of cables for Vattenfall Vanguard (and Vattenfall Boreas) and cables for other wind farm proposals (Ørsted Hornsea Project Three) crossing at a location south of the North Norfolk District. Whilst this does not affect North Norfolk and it is through no fault of Vattenfall or Ørsted, North Norfolk District Council believes it does emphasise the need for better joined-up thinking by National Grid on large infrastructure projects such as these as well as a need to improve network capacity generally. North Norfolk District Council has previously raised this issue with the Secretary of State for Business, Energy and Industrial Strategy directly and with senior officers at National Grid Electricity Transmission Limited.</p>	
Health Impact Assessment (HIA)		
<p>The methodology adopted for the HIA, outlined in Chapter 27 Human Health (document reference 6.1.27 of the Application (APP-240)) is appropriate and robust, and the outcome of the assessment is suitable.</p>	<p>NNDC agree with the general methodology adopted. Once constructed the impacts of the proposal on human health are likely to be benign. However, it is the impact during construction which has the greatest potential to impact upon human health and these impacts are covered within other sections of the Environmental Statement where further comment is provided.</p>	Agreed
Discharge of Requirements (Norfolk Boreas DCO Schedule 16)		
<p>Schedule 16 of the Norfolk Boreas draft DCO has been updated to reflect NNDC's comments on Schedule 15 of the draft DCO for Norfolk Vanguard, submitted during the Norfolk Vanguard Examination process at Deadline 3.</p>	<p>NNDC is content for the DCO to contain the process for discharging requirements set out in Schedule 16, which includes the suggested modifications submitted by NNDC to the Norfolk Vanguard examination at Deadline 3.</p>	Agreed

2.2 Marine Geology, Oceanography and Physical Processes

19. The project has the potential to impact upon marine geology, oceanography and physical processes. Chapter 8 Marine Geology, Oceanography and Physical Processes of the Norfolk Boreas Environmental Statement (ES) (document reference 6.1.8 of the Application, APP-221) provides an assessment of the significance of these impacts.
20. Details on the Evidence Plan Process for marine geology, oceanography and physical processes can be found in Consultation Report Appendix 9.16 (document reference 5.1.9.16 of the Application, APP-053) and Appendix 28.01 (document reference 5.1.28.01 of the Application, APP-192).
21. Table 4 outlines the topics for agreement with respect to marine geology, oceanography and physical processes between North Norfolk District Council and the Applicant.

Table 4 Agreement Log - Marine Geology, Oceanography and Physical Processes

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
Existing Environment	Survey data outlined in Table 8.9, ES Chapter 8 (APP-221) which is used in the Norfolk Boreas assessment for the characterisation of Marine Geology, Oceanography and Physical Processes is considered suitable.	NNDC's jurisdiction only extends down to MLWS. NNDC will rely on other consultees to comment on survey data collected beyond this point.	Agreed down to MLWS
	The ES adequately characterises the baseline environment in terms of Marine Geology, Oceanography and Physical Processes (section 8.6 of ES Chapter 8 APP-221).		
Assessment methodology	Appropriate legislation, planning policy and guidance relevant to Marine Geology, Oceanography and Physical Processes has been used. Section 8.2 of ES Chapter 8 (APP-221).	Whilst no reference has been made to NNDC Core Strategy Policy EN 11, reference has been made to the relevant Shoreline Management Plan. The key issue is the effect of the proposed development on coastal processes and coastal erosion and the decision to use the 'long' HDD option to bring cable onshore will be unlikely to result in adverse coastal impacts (subject to, inter alia, an agreed CoCP and decommissioning plans)	Agreed
	The list of potential impacts assessed in section 8.7 ES Chapter 8 (APP-221) for Marine Geology, Oceanography and Physical Processes is appropriate.	NNDC's jurisdiction only extends down to MLWS. NNDC will rely on other consultees to comment on list of impacts beyond this point.	Agreed down to MLWS
	The worst-case scenario used in the assessment for Marine Geology, Oceanography and Physical Processes is appropriate as outlined in table 8.16 ES Chapter 8 (APP-221).	NNDC welcome the position set out by Vattenfall at paragraph 402 of Chapter 8 of the Environmental Statement which states:	Agreed but with further ongoing discussions about Cart Gap sea wall.

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
	<p>The Applicant is open to discussing the feasibility of providing spoil to NNDC post-consent, should NNDC wish to proceed with seeking a licence to infill the Cart Gap seawall.</p> <p>Further to this, the position agreed between the parties is that the use of clean spoil from the project in relation to coastal defence matters at Cart Gap can be explored further outside of the DCO process.</p>	<p><i>'The HDD will be secured beneath the surface of the shore platform and the base of the cliff, drilled from a location greater than 150m landward of the cliff edge. The material through which the HDD will pass, and through which the cables will ultimately be located, is consolidated and will have sufficient strength to maintain its integrity during the construction process and during operation. Also, the cable will be located at sufficient depth to account for shore platform steepening (downcutting) as cliff erosion progresses, and so will not become exposed during the design life of the project (approximately 30 years). Hence, the continued integrity of the geological materials and the continued depth of burial of the cables mean that they will have no impact on coastal erosion during both construction and operation'.</i></p> <p>This represents the best option for NNDC. However, NNDC will continue to work with the applicant to understand the potential options for Cart Gap sea wall. This end section of seawall has suffered from cliff scour and a significant void between the cliff and defence is now present. Should appropriate locally generated clean spoil requiring disposal be generated during construction, it could be considered</p>	

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
		<p>beneficial to reuse these materials to infill behind this sea wall. NNDC welcomes the applicant's confirmation that they are open to discussing the feasibility of providing clean spoil to NNDC post-consent, should NNDC wish to proceed with seeking a licence to infill the Cart Gap seawall. Given the potential for re-use of spoil to reduce overall traffic movements, NNDC would be happy to work with the applicant and relevant land owners to take forward this opportunity. This could be secured within the final DCO either as part of the CoCP (as part of Soil Management, as a Construction Method Statement or as part of the Site and Excavated Waste Management (with a specific new topic covering re-use of clean spoil)) or other relevant documents to be determined between the parties.</p> <p>NNDC agree the proposal is unlikely to be adversely affected by the Bacton sand engine coastal protection scheme north of the site at Bacton Gas Terminal and along the coast towards Bacton and Walcott</p> <p>In the likely event of the DCO being granted, NNDC would not expect that any subsequent changes from the 'long' HDD option to bring cables onshore to the use of open cut trenching could be permitted within the scope of a 'non-material' amendments as</p>	

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
		<p>this would take the proposal outside the scope of the Environmental Statement. 'Open cut trenching' would represent the very worst option for NNDC, hence why there is strong support for 'long' HDD.</p>	
<p>Assessment findings</p>	<p>The characterisation of receptor sensitivity is appropriate. Section 8.4.1 ES Chapter 8 (APP-221).</p> <p>The magnitude of effect is correctly identified. Section 8.4.1 of ES Chapter 8 (APP-221).</p> <p>The impact significance conclusions of negligible significance for Norfolk Boreas alone are appropriate.</p> <p>Norfolk Boreas Limited is committed to ensuring the landfall HDD is at a sufficient depth below the coastal shore platform and cliff base in order to have no effect on coastal erosion (section 8.7.4.1 and Table 8.39 of ES Chapter 8, APP-221) and remain resilient to the effects of coastal erosion for its anticipated lifetime. Table 8.38 refers to the potential effects of cable protection at the subtidal landfall HDD exit points.</p> <p>Further to this the Applicant has also committed to monitoring erosion at the landfall throughout the operation of the Project. This is secured in the wording of Schedule 1, Part 3, Requirement 17 of the draft DCO.</p>	<p>NNDC's jurisdiction only extends down to MLWS. NNDC will rely on other consultees to comment on characterisation of receptor sensitivity beyond this point.</p> <p>Whilst NNDC generally agree with characterisation of receptor sensitivity and bringing cables onshore via 'long' HDD is the preferred method, it has to be recognised that HDD is an intrusive process which is not easily reversible once completed. NNDC would want to ensure the Environmental Impact Assessment has recognised this (Table 8.38 and 8.39 in Chapter 8 are perhaps unclear on this point).</p> <p>The presumption by Vattenfall at ISH1 of the Norfolk Vanguard Examination that coastal erosion equilibrium will be reached in the future is possible but it is for the Applicant to consider in relation to the location and resilience of their assets for their designed life. It is understood that the assets to be placed within the 100year coastal erosion zone would be the cables that are to be routed below the predicted level of beaches.</p>	<p>Agreed</p>

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
		The key issue for NNDC is ensuring that that the landfall location remains resilient from the effects of coastal erosion for its anticipated lifetime.	
Cumulative Impact Assessment (CIA)	The plans and projects considered within the CIA (Table 8.44 of ES Chapter 8, APP-221) are considered appropriate.	Agreed	Agreed
	The CIA methodology (section 8.4.2 of ES Chapter 8, APP-221) is appropriate.	Agreed	Agreed
	The cumulative impact conclusions of negligible significance are appropriate (section 8.8 of ES Chapter 8, APP-221).	Agreed	Agreed
Mitigation and Management	The use of long HDD at landfall would prevent any interference with coastal processes. This was agreed via PEIR feedback in December 2018.	NNDC consider the 'long' HDD option represents the best and preferred option. Whilst it cannot be categorically ruled out that this option would 'prevent any interference with coastal processes', as the best-case scenario option, any impact on coastal processes would be considered negligible by NNDC.	Agreed
	Given the impacts of the project, the proposed mitigation and monitoring is adequate. Embedded mitigation, identified in ES Chapter 8, section 8.7.4.1, APP-221 (which includes long HDD as required under draft DCO Schedule 1 Part 3 Requirement 17(2)) has been considered as part of the project design when undertaking the impact assessment. This is therefore a component of the impact significance summarised in Table 8.46	Agreed on the basis that the landfall location remains resilient from the effects of coastal erosion for its anticipated lifetime.	Agreed

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
	Interaction between Impacts (section 8.10, Chapter 8, APP-221)) and no further mitigation is proposed in order to further reduce the residual impact significance.		

2.3 Ground Conditions and Contamination

22. The project has the potential to impact upon ground conditions and contamination. Chapter 19 Ground Conditions and Contamination of the ES, (document reference 6.1.19 of the Application, APP-232), provides an assessment of the significance of these impacts.
23. Details on the Evidence Plan Process for ground conditions and contamination can be found in Consultation Report Appendix 9.8 (document reference 5.1.9.8 of the Application, APP-045).
24. Table 5 outlines the topics for agreement with respect to ground conditions and contamination between North Norfolk District Council and the Applicant.

Table 5 Agreement Log - Ground Conditions and Contamination

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
Existing Environment	<p>Sufficient survey data has been collected to inform the assessment presented within the submitted Environment Statement (section 19.5.2, ES Chapter 19 (document reference 6.1.19, APP-232). It is considered that the Norfolk Vanguard survey data is valid for the Norfolk Boreas application due to the spatial overlapping of the two projects. Therefore, no further phase 1 contaminated land surveys are required for the Norfolk Boreas assessment with regards to the ground conditions and contamination. Agreed as part of the Evidence Plan Process.</p> <p>As outlined in section 19.7.4.6.1 of Chapter 19 Ground Conditions and Contamination (document reference 6.1.19, APP-232) and section 6.1 of the Outline Code of Construction Practice (OCoCP) (document reference 8.1), further consideration of ground contamination will be undertaken pre-construction and a written scheme (based on the Model procedures for the management of land contamination, CLR11) for the management of contamination will be submitted and approved by the relevant local authority and will be informed by further site investigation where appropriate. The document will also provide procedures to follow in the event of encountering unexpected contamination and will include proposals to deal with any waste soils excavated during the works. This is secured through Requirement 20 of the DCO and the relevant</p>	<p>Agreed, the phase one details are sufficient to cover the Boreas assessment.</p> <p>Chapter 19.5.3 sets out the assumptions and limitations associated with the data sources used to inform the report. NNDC cannot reasonably consider at this stage that sufficient survey data has been collected to undertake the assessment. Whilst proposed construction activities are predominantly taking place in agricultural fields where the risk of contamination is likely to be low, contaminated land could be discovered at any point along the proposed works, especially where human activity has occurred. The assessment cannot therefore rule out the potential for unknown contamination to be identified during the construction phase. This said, the key factor is to ensure there is an appropriate strategy in place to deal with contamination should it arise and NNDC is now generally content that an appropriate strategy can be secured within the DCO and CoCP.</p>	<p>Agreed</p>

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
Assessment methodology	The impact assessment methodologies as outlined in section 19.4.1, ES Chapter 19 (APP-232) used for the Environmental Impact Assessment (EIA) represent an appropriate approach to assessing potential impacts of the project. Agreed as part of the Evidence Plan Process.	Agreed – Methodology is acceptable.	Agreed
	The worst case assumptions for Scenario 1 and Scenario 2, as outlined in Table 19.15 and 19.16 in ES Chapter 19 (APP-232) respectively, are considered appropriate.	Agreed	Agreed
Assessment findings	The assessment adequately characterises the baseline environment in terms of ground conditions and contamination outlined in Section 19.6 ES Chapter 19 (APP-232).	Agreed – Information provided within Chapter 19 paragraph 19.6 provides a sound characterisation.	Agreed
	The assessment of impacts of both scenarios for construction, operation and decommissioning presented in section 19.7, ES Chapter 19 (APP-232) is appropriate and, assuming the inclusion of the embedded mitigation described, impacts on ground conditions and contamination are likely to be non-significant in EIA terms.	Agreed	Agreed
	The assessment of cumulative impacts of both scenarios presented in section 19.8, ES Chapter 19 (APP-232) is appropriate and, assuming the inclusion of the embedded mitigation described, cumulative impacts on ground conditions and contamination are likely to be non-significant in EIA terms.	Agreed	Agreed
Approach to mitigation	The provision of a Materials Management Plan (MMP) as outlined in the OCoCP (document reference 8.1) is considered suitable to mitigate impacts on Mineral Safeguarding Areas (MSA).	NNDC would defer consideration to Norfolk County Council as the relevant Mineral Authority	N/A

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
	Given the impacts of the project, the mitigation proposed for both scenarios for ground conditions and contamination as outlined in Chapter 19 document reference 6.1.19 (APP-232) is considered appropriate and adequate.	Agreed	Agreed
Wording of Requirement(s)	The wording of Requirements provided within the draft DCO and supporting certified documents) for the mitigation of impacts associated with ground conditions and contamination are considered appropriate and adequate.	Agreed.	Agreed

2.4 Water Resources and Flood Risk

25. The project has the potential to impact upon water resources and flood risk. Chapter 20 Water Resources and Flood Risk of the ES (document reference 6.1.20 of the Application, APP-233) provides an assessment of the significance of these impacts.
26. In respect of the impact of the project on water resources and flood risk within North Norfolk District Council (NNDC) jurisdiction, NNDC would defer to the expert advice of the Environment Agency in respect of the strategic overview of the management of all sources of flooding and coastal erosion, to the advice of Norfolk County Council Lead Local Flood Authority in respect of developing, maintaining and applying a strategy for local flood risk management in this area and for maintaining a register of flood risk assets. NNDC would also defer to the advice of Norfolk Rivers Internal Drainage Board who manage assets within/along/near the route of the proposed onshore cable corridor.

2.5 Land Use and Agriculture

27. The project has the potential to impact upon land use and agriculture. Chapter 21 Land Use and Agriculture of the ES, (document reference 6.1.21 of the Application, APP-234), provides an assessment of the significance of these impacts.
28. Details on the Evidence Plan Process for land use and agriculture can be found in Consultation Report Appendix 9.19 (document reference 5.1.9.19 of the Application, APP-056).
29. Table 6 outlines the topics for agreement with respect to land use and agriculture between North Norfolk District Council and the Applicant.

Table 6 Agreement Log - Land Use and Agriculture

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
Existing Environment	Sufficient survey data has been collected to undertake the assessment, as outlined in section 21.5 and 21.6 of ES Chapter 21 (document reference 6.1.21 of the Application, APP-234).	Chapter 21 of the Environmental Statement (21.5 and 21.6) provide a good basis to undertake the assessment	Agreed
Assessment methodology	The impact assessment methodologies used for the EIA as outlined in section 21.4, ES Chapter 21 (APP-234) provide an appropriate approach to assessing potential impacts of the project.	Agreed	Agreed
	The worst case assumptions for Scenario 1 and Scenario 2, as outlined in Tables 21.16 and 21.17 in ES Chapter 21 (APP-234) respectively, are considered appropriate.	Agreed	Agreed
	The ES adequately characterises the baseline environment in terms of land use and agriculture as outlined in section 21.6, ES Chapter 21 (APP-234).	Agreed	Agreed
Assessment findings	<p>The assessment of impacts of both scenarios for construction, operation and decommissioning presented in section 21.7, ES Chapter 21 (APP-234) is appropriate and, assuming the inclusion of the embedded mitigation described (tables 21.14 and 21.15 in ES Chapter 21, APP-234), impacts on land use and agriculture are likely to be non-significant in EIA terms.</p> <p>Embedded mitigation includes:</p> <ul style="list-style-type: none"> • Commitment to HVDC; • Ducting installed for both Norfolk Vanguard and Norfolk Boreas as the same time (subject to both projects receiving consent) (Scenario 1); and • Sectionalised approach to works, whereby works are undertaken on a 150m section at a time and each section reinstated before moving onto the next 150m section (Scenario 2). 	<p>NNDC consider that the primary consideration for land use and agriculture relates to the timing of works (such as avoiding taking agricultural land out of production for long periods of time) how works are undertaken (to be agreed within the CoCP) including the method for handling/storing soils. The commitments made by Vattenfall through use of HVDC with a smaller working corridor, the commitment to ducting both Vanguard and Boreas at the same time all contribute to reducing the Rochdale envelope of the project. As such the significance of any impacts are dependent on the requirements to be agreed within the DCO.</p> <p>NNDC welcome the suggested embedded mitigation and additional mitigation</p>	Agreed

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
	<p>Additional mitigation committed to within the Outline CoCP and secured through Requirement 20 of the draft DCO includes:</p> <ul style="list-style-type: none"> • Production of Soil Management Plan (setting out procedures for soil handling and storage); and • A local specialised drainage contractor will undertake surveys to locate drains in consultation with landowners to create drawings both pre- and post-construction and ensure appropriate reinstatement (Appendix C of the Outline CoCP) <p>Engagement with landowners is ongoing as part of landowner agreement discussions.</p>	<p>committed to within the CoCP and secured through Requirement 20.</p>	
	<p>The assessment of cumulative impacts for both scenarios presented in section 21.8, ES Chapter 21 (APP-234) is appropriate and, assuming the inclusion of the embedded mitigation described (tables 21.14 and 21.15 in ES Chapter 21, APP-234), cumulative impacts on land use and agriculture are likely to be non-significant in EIA terms.</p>	<p>Agreed</p>	<p>Agreed</p>
<p>Approach to mitigation</p>	<p>The mitigation proposed for land use and agriculture as presented in section 21.7, ES Chapter 21 (APP-234) as well as embedded mitigation described (tables 21.14 and 21.15 in ES Chapter 21, APP-234), are considered appropriate and adequate.</p>	<p>NNDC consider that the primary consideration for land use and agriculture relates to the timing of works (such as avoiding taking agricultural land out of production for long periods of time) how works are undertaken (to be agreed within the CoCP) including the method for handling/storing soils. The commitments made by Vattenfall through use of HVDC with a smaller working corridor, the commitment to ducting both Vanguard and Boreas at the same time all contribute to reducing the Rochdale envelope of the project. As such the significance of any impacts are</p>	<p>Agreed</p>

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
		<p>dependent on the requirements to be agreed within the DCO. NNDC welcome the suggested embedded mitigation and additional mitigation committed to within the CoCP and secured through Requirement 20.</p>	

2.6 Onshore Ecology and Onshore Ornithology

30. The project has the potential to impact upon onshore ecology and onshore ornithology. Chapter 22 Onshore Ecology and Chapter 23 Onshore Ornithology of the ES, (document reference 6.1.22 (APP-235) and 6.1.23 (APP-236) respectively), provides an assessment of the significance of these impacts.
31. Details on the Evidence Plan Process for onshore ecology and onshore ornithology can be found in Consultation Report Appendix 9.17 (document reference 5.1.9.17 of the Application, APP-054) and Appendix 28.1 (document reference 5.1.28.1, APP-192).
32. Table 7 outlines the topics for agreement with respect to onshore ecology and ornithology between North Norfolk District Council and the Applicant.

Table 7 Agreement Log - Onshore Ecology and Onshore Ornithology

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
Survey methodology	Survey methodologies for Phase 1 Habitat Surveys are appropriate and sufficient.	Agreed	Agreed
	Survey methodologies for Phase 2 Surveys are appropriate and sufficient.	Agreed	Agreed
Existing Environment	<p>Survey data collected for Norfolk Vanguard and Norfolk Boreas for the characterisation of onshore ecology and ornithology are suitable to inform the assessment (as summarised in section 22.5.2 of ES Chapter 22 (APP-235) and section 23.5.2 of ES Chapter 23 (APP-236)).</p> <p>Where access for surveys was not possible a precautionary approach was adopted, i.e. assuming that relevant receptors were present, and this was captured within the assessment and a commitment to pre-construction surveys of the 'unsurveyed' areas has been made. This is set out for each ecological receptor within the ES Chapter 22 (APP-235) and committed to within the Outline Landscape and Environmental Management Strategy (OLEMS) (document reference 8.7) and secured through Requirement 24 Ecological Management Plan of the draft DCO.</p>	<p>NNDC recognises that Vattenfall have undertaken desktop studies and Extended Phase 1 Habitat Surveys together with site specific surveys in accordance with best practice recommendations in order to inform the baseline data which underpin Environmental Statement Volume 1 Chapter 22 – Onshore Ecology and Volume 1 Chapter 23 Onshore Ornithology. Statutory and Non-Statutory designated sites are recognised within Figures 22.2 and 22.3. However, the ES recognises that not all areas have been surveyed in setting out potential impacts and cumulative impacts and therefore Vattenfall need to recognise this in making any assumptions about the proposal. Post-consent surveying needs to be secured within the DCO. NNDC will work with Vattenfall to ensure key ecological objectives are met.</p>	Agreed

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
Assessment methodology	Appropriate legislation, planning policy and guidance relevant to ecology and ornithology has been considered for the project (listed in section 22.2 and 23.2 in ES Chapter 22 Onshore Ecology (APP-235) and ES Chapter 23 Onshore Ornithology (APP-236) respectively).	Agreed	Agreed
	The list of potential impacts on onshore ecology (section 22.7, APP-235) and onshore ornithology (section 23.7, APP-236) assessed is appropriate.	Agreed	Agreed
	The impact assessment methodologies (section 22.4 in ES Chapter 22 APP-235 and section 23.4 in ES Chapter 23 APP-236) used for the EIA provide an appropriate approach to assessing potential impacts of the project.	Agreed	Agreed
	The worst case assumptions for Scenario 1 and Scenario 2 for onshore ecology, as outlined in Tables 22.22 and 22.23 in ES Chapter 22 (APP-235) respectively, and those for onshore ornithology as outlined in Tables 23.23 and 23.24 in ES Chapter 23 (APP-236) are considered appropriate.	Agreed	Agreed

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
Assessment findings	<p>The assessment of impacts of both scenarios for construction, operation and decommissioning presented for onshore ecology (section 22.7, APP-235) and onshore ornithology section 23.7, APP-236) are appropriate.</p> <p>Further to this the wording of Requirement 24 within the draft DCO includes the following wording <i>“The ecological management plan must be informed by post consent ecological surveying of previously un-surveyed areas for the relevant stage.”</i></p>	<p>NNDC recognises that Vattenfall have undertaken desktop studies and Extended Phase 1 Habitat Surveys together with site specific surveys in accordance with best practice recommendations in order to inform the baseline data which underpin Environmental Statement Volume 1 Chapter 22 – Onshore Ecology and Volume 1 Chapter 23 Onshore Ornithology. Statutory and Non-Statutory designated sites are recognised within Figures 22.2 and 22.3. However, the ES recognises that not all areas have been surveyed in setting out potential impacts and cumulative impacts and therefore Vattenfall need to recognise this in making any assumptions about the proposal.</p>	Agreed
	<p>The assessment of cumulative impacts for both scenarios as presented in section 22.8 of ES Chapter 22 (APP-235) for onshore ecology and section 23.8 of the ES Chapter 23 (APP-236) for onshore ornithology are appropriate. Further to this the wording of Requirement 24 within the draft DCO includes the following wording <i>“The ecological management plan must be informed by post consent ecological surveying of previously un-surveyed areas for the relevant stage.”</i></p>	<p>NNDC are content that post-consent surveying has been secured within the DCO at Requirement 24 and will work with Vattenfall to ensure key ecological objectives are met.</p>	
Approach to mitigation	<p>All mitigation measures that have been identified as required for both scenarios, as well as commitments to complete the ecological surveys for previously inaccessible areas are outlined in the OLEMS.</p>	<p>NNDC will work with Vattenfall to ensure key ecological objectives are met.</p>	Agreed
	<p>There are no wooded areas that will be directly affected by the onshore cable route in the North Norfolk District. The cable route</p>	<p>NNDC have evidenced within the Local Impact Report to be submitted at Deadline 2 as to why a ten year rather than a five-year replacement planting period should be applied to the Norfolk</p>	Agreed

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
	<p>crosses a number of hedgerows, some of which will have occasional individual trees.</p> <p>Under Scenario 2 the Applicant has committed to micro-siting the cable route to avoid individual trees in hedgerows where possible – the width of the hedgerow crossings are reduced up to 16.5m to achieve this. However, as a worst case up to 40 trees within hedgerows may need to be removed within North Norfolk. Due to the nature of the installed infrastructure the Applicant cannot replace individual trees on top of the buried cables. However, there may be opportunities to replace trees within the Order limits but outside of the permanent operational easement. The Applicant has now committed to replacing trees as close as practicable to the location where they were removed, outside of the permanent operational easement and subject to landowner agreement.</p> <p>In addition, the Applicant will commit to 10 years of post-planting maintenance for replaced trees within North Norfolk, subject to landowner agreement.</p> <p>This is a new commitment and will ensure no net loss of trees within North Norfolk. This will be captured within an update to the Outline Landscape and Ecological Management Strategy (OLEMS) and secured through Requirement 18 of the draft DCO.</p>	<p>Vanguard and Norfolk Boreas DCOs under requirement 19 (2). Similar evidence was presented to the ExA for Ørsted Hornsea Project Three and, in the Examining Authority’s schedule of changes to the draft Development Consent Order for HP3 (issued 26 Feb 2019), the ExA in that DCO indicated that they are minded to agree to a ten-year replacement planting period. Accordingly, the ExA are invited to take a similar and consistent approach with Norfolk Boreas.</p> <p>NNDC welcome the recent commitment by the Applicant to provide for replacement trees as close as practicable to the location where they were removed in North Norfolk along the cable route and to accept the ten year replacement planting requirement so as to ensure no net loss of trees within North Norfolk.</p> <p>DCO Requirements 18 (Provision of Landscaping) and 19 (Implementation and maintenance of landscaping) to be amended to a period of ten years after planting are welcomed by NNDC.</p>	

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
	<p>Under Scenario 1 hedgerows removals in North Norfolk will be undertaken by Norfolk Vanguard and no additional removals are required by Norfolk Boreas.</p>		
	<p>Under Scenario 2, the use of trenchless crossing techniques at County Wildlife Sites (CWS) is acceptable subject to detailed design.</p> <p>Under Scenario 1 trenchless crossings will not be required as these will have been installed by Norfolk Vanguard.</p>	<p>Agreed</p>	<p>Agreed</p>
	<p>The provision of an Ecological Management Plan (EMP) (based on the OLEMS submitted with the DCO application, document reference 8.7 is considered suitable to ensure potential impacts identified in the Ecological Impact Assessment (EclA) are reduced to a non-significant level.</p> <p>The OLEMS sets out the commitments to undertake pre-construction surveys for all ecological receptors, including all unsurveyed areas.</p> <p>Requirement 24 of the draft DCO sets out that no stage of the onshore transmission works may commence until for that stage a written ecological management plan (which accords with the OLEMS) has been submitted to and approved by the relevant planning authority in consultation with Natural England.</p>	<p>NNDC welcome the inclusion of wording within DCO Requirement 24 stating that <i>“The ecological management plan must be informed by post consent ecological surveying of previously unsurveyed areas for the relevant stage.”</i></p> <p>This addresses the previous concerns expressed by NNDC in earlier iterations of the Vanguard SoCG about the need for post-consent surveying. In discharging these requirements, NNDC will work with Vattenfall to ensure key ecological objectives are met.</p>	<p>Agreed</p>

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
	Further to this the wording of Requirement 24 within the draft DCO includes the following wording <i>“The ecological management plan must be informed by post consent ecological surveying of previously un-surveyed areas for the relevant stage.”</i>		
	The mitigation proposed for bats as outlined in section 22.7.5.10 of ES Chapter 22 (APP-235) is appropriate and proportionate.	NNDC welcome the inclusion of wording within DCO Requirement 24 stating that <i>“The ecological management plan must be informed by post consent ecological surveying of previously un-surveyed areas for the relevant stage.”</i> In discharging these requirements, NNDC will work with Vattenfall to ensure key ecological objectives are met.	Agreed
	The mitigation proposed for great crested newts (GCN) as outlined in section 22.7.5.13 of ES Chapter 22 (APP-235) is appropriate and proportionate.	NNDC welcome the inclusion of wording within DCO Requirement 24 stating that <i>“The ecological management plan must be informed by post consent ecological surveying of previously un-surveyed areas for the relevant stage.”</i> In discharging these requirements, NNDC will work with Vattenfall to ensure key ecological objectives are met.	Agreed
Screening of Likely Significant Effects (LSE)	The methodology and sites screened in for the HRA as presented in Appendix 5.2 of the Information to Support HRA report (document reference 5.3.5.2 of the Application, APP-203) are considered appropriate, considering sites within 5km of onshore infrastructure.	Agreed	Agreed

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
	<p>The approach to HRA screening is appropriate. The following sites are screened in for further assessment:</p> <ul style="list-style-type: none"> • River Wensum; • Paston Great Barn; and • Norfolk Valley Fens. 	Agreed	Agreed
Assessment of Adverse Effect on Integrity	<p>The approach to the assessment (as outlined in the Information to Support HRA report, document reference 5.3, APP-201) is appropriate.</p>	Agreed	Agreed
	<p>The conclusions of no adverse effect on site integrity in the Information to Support HRA report (document reference 5.3, APP-201) are appropriate.</p>	This is a matter for the ExA to determine	N/A
Wording of Requirement(s)	<p>Requirement 24 of the draft DCO (and supporting certified documents) for the mitigation of impacts to onshore ecology and ornithology are considered appropriate and adequate.</p> <p>Requirement 24 sets out that no stage of the onshore transmission works may commence until for that stage a written ecological management plan (which accords with the OLEMS) has been submitted to and approved by the relevant planning authority in consultation with Natural England.</p>	<p>NNDC welcome the inclusion of wording within DCO Requirement 24 stating that <i>“The ecological management plan must be informed by post consent ecological surveying of previously un-surveyed areas for the relevant stage.”</i></p> <p>In discharging these requirements, NNDC will work with Vattenfall to ensure key ecological objectives are met.</p>	Agreed

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
	Further to this the wording of Requirement 24 within the draft DCO includes the following wording <i>“The ecological management plan must be informed by post consent ecological surveying of previously un-surveyed areas for the relevant stage.”</i>		

2.7 Traffic and Transport

33. The project has the potential to impact upon traffic and transport. Chapter 24 of the ES (document reference 6.1.24 of the Application, APP-237) provides an assessment of the significance of these impacts.
34. In respect of traffic and transport North Norfolk District Council defer such matters of consideration to Norfolk County Council, who are the Highway Authority covering North Norfolk and who are the technical experts who would normally give highway advice to the District Council.

2.8 Noise, Vibration and Air Quality

35. The project has the potential to impact upon noise, vibration and air quality receptors. Chapter 25 Noise and Vibration and 26 Air Quality of the ES, (document reference 6.1.25 (APP-238) and 6.1.26 (APP-239)), provides assessments of the significance of these impacts.
36. Details on the Evidence Plan for noise, vibration and air quality can be found in Consultation Report Appendix 9.23 (document reference 5.1.9.23, APP-060) and Appendix 9.24 (document reference 5.1.9.24, APP-061).
37. Table 8 outlines the topics for agreement with respect to noise, vibration and air quality between North Norfolk District Council and the Applicant.

Table 8 Agreement Log – Noise, Vibration and Air Quality

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
Existing Environment	Sufficient survey data (extent/duration) has been collected, section 25.6.2 of ES Chapter 25 (APP-238) and section 26.5.2 ES Chapter 26 (APP-239), and in appropriate locations to characterise the noise and air quality environments to undertake the assessments.	Agreed	Agreed
Assessment methodology	The impact assessment methodologies outlined in section 25.4 of ES Chapter 25 (APP-238) and section 26.4 of ES Chapter 26 (APP-239) for the assessment represent an appropriate approach to assessing potential impacts.	Agreed	Agreed
	The worst case assumptions for noise and vibration in section 25.8.3 of ES Chapter 25 (APP-238) and those for air quality outlined in Tables 26.29 (Scenario 1) and Table 26.30 (Scenario 2) in ES Chapter 26 (APP-239) are considered appropriate.	Agreed	Agreed
	The assessments adequately characterise the baseline environment in terms of noise and vibration as outlined in section 25.5 of ES Chapter 25 (APP-238) and in terms of air quality section 26.6 of ES Chapter 26 (APP-239).	Agreed	Agreed
Assessment findings	The assessment of impacts of both scenarios for construction, operation and decommissioning presented in section 25.8 of ES Chapter 25 (APP-238) and section 26.7 of ES Chapter 26 (APP-239) is appropriate and, assuming the inclusion of the mitigation described, impacts from noise, vibration and air quality are non-significant in EIA terms.	NNDC consider that the measures set out in the draft DCO (Requirement 20 - Code of Construction Practice and Requirement 26 – Construction Hours) provides an effective way to help minimise any adverse impacts during the construction phase and will work with the applicant to ensure the DCO requirement drafting delivers its intended purpose.	Agreed
	The assessment of cumulative impacts of both scenarios presented in section 25.9 of ES Chapter 25 (APP-238) and section 26.8 of ES Chapter 26 (APP-239) is appropriate and, assuming the inclusion of the mitigation described, cumulative impacts from noise, vibration and air quality are non-significant in EIA terms.	Agreed	Agreed

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
Approach to mitigation	<p>The consented working hours are 7am to 7pm Monday to Friday, and 7am to 1pm on Saturdays (draft DCO Requirement 26). Outside of these hours mobilisation areas will effectively be locked. To prevent HGVs arriving at a locked compound (outside of the consented hours) control of HGV deliveries is set out at sections 3.3, 3.4 and 3.5 of the Outline Traffic Management Plan (OTMP) (document reference 8.8 of the Application). Control measures include:</p> <ul style="list-style-type: none"> • HGV booking system - the booking system will enable a daily profile of deliveries to be maintained and allow the contractor to ensure that the required deliveries are regularly forecast and planned. Suppliers will be informed of the working hours and their booking slot and their supplier contracts will be based on adhering to these conditions. • Suppliers will be warned that HGVs will be refused access and turned away if they arrive outside of their allocated time slot. This is proposed as a deterrent to ensure suppliers adhere to this control mechanism. • A small number of daily slots will be reserved to accommodate any unplanned deliveries. • The contractor will be required to keep an up to date record of deliveries and exports from the project, this will take the form of delivery receipts. This information will be retained to be provided to the relevant local authority, NCC and Highways England upon request. • Supply chain vehicles will display a unique identifier in the cab of the vehicle. • Should there be any occasion where a supplier does not adhere to the prescribed controls enforcement measures will be taken. 	<p>The Applicant has indicated that any HGVs arriving prior to 7am would not be permitted onto site. NNDC welcome the commitments from the Applicant to amend the Traffic Management Plan so as to advise drivers of approved lorry parks, motorway services or other designated parking areas between the source of the delivery and site. This will assist drivers when they may be running early / late in relation to set delivery timeslots to avoid instances where drivers arrive outside of their timeslot and attempt to wait nearby.</p> <p>NNDC would welcome the opportunity to review the advice being given to drivers as part of this commitment.</p>	Agreed

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
	<p>Further to this, as committed to within section 3.5 the OTMP the final TMP will include advice to drivers of approved lorry parks, motorway services or other designated parking areas between the source of the delivery and site. This will assist drivers when they may be running early / late in relation to set delivery timeslots to avoid instances where drivers arrive outside of their timeslot and attempt to wait nearby.</p>		
	<p>In relation to Requirement 26(2)(h), daily start up or shut down is outside of the specified construction hours, this was intended to allow activities in connection with good practice site management and safety measures. It would include, for example, personnel arriving to site in advance of shift start time, undertaking daily site health and safety inspections and the provision of tool box talks. This will ensure that the site is open and ready to accept deliveries promptly from 7am. Such activities would only be permitted to the extent that they were considered 'non-intrusive'.</p> <p>Further to this the Applicant has provided the details and timings of start-up / shut down activities within section 3.1 of the OCoCP (document reference 8.1).</p>	<p>NNDC welcomes the commitment from the Applicant in relation to daily start up and shut down as to be set out within an updated OCoCP as linked to Requirement 26.</p>	<p>Agreed</p>
	<p>Section 4.1 of the OTMP (REP8-007) identifies that Little London Road (link 69) will have construction traffic capped at a maximum of 48 HGV movements per day under Scenario 2 and 30 HGV movements per day under Scenario 1. Table 4.3 of the OTMP states specific traffic measures require at link 69, Little London Road, including that the proposed HGV cap must be achieved using smaller payload vehicles (~10tonne). In addition, community engagement is key to ensuring the severance impacts are managed on Little London Road and this is</p>	<p>NNDC reviewed the information contained in the OTMP (latest version submitted at Deadline 8 REP8-007 and the OCoCP (latest version submitted at Deadline 8 REP8-003)</p> <p>Within the OTMP, NNDC's earlier concerns remained in respect of Local Community Liaison (Section 5.2). NNDC remained of the view that the communication plan should ensure that complaints received by the</p>	<p>Agreed subject to the OTMP and OCoCP being updated.</p>

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
	<p>reinforced in Section 5.2 of the OTMP (REP8-007) which sets out the strategy for Local Community Liaison as follows: <i>Norfolk Boreas Limited will ensure effective and open communication with local residents and businesses that may be affected by noise or other amenity aspects caused by the construction works. Communications will be co-ordinated on site by a designated member of the construction management team. A proactive public relations campaign will be maintained, keeping local residents informed of the type and timing of works involved, the transport routes associated with the works, the hours of likely construction traffic movements and key traffic management measures that would be provided.</i></p> <p>A cumulative impact traffic assessment has been undertaken to take into account updated information associated with Hornsea Project 3 construction traffic. The assessment can be found in section 24.8.1.3 of Chapter 24 Traffic and Transport (document reference 6.1.24 of the Application, APP-237), however it should be noted that there are no road links in the North Norfolk District that will be shared by both projects.</p> <p>The OCoCP and OTMP have been updated to include: <i>'Any complaints received should be shared with the relevant local authority in a timely manner, where complainant consent is given, to enable the local authorities to undertake their duties to investigate complaints relating to construction activities and respond within an agreed timeframe.'</i> Updated documents to capture this commitment to be submitted at Deadline 10.</p>	<p>contractor are shared with the local authority in a timely manner, where complainant consent is given, to enable the local authorities to undertake their duties to investigate complaints relating to construction activities and respond within an agreed timeframe.</p> <p>An agreed method of communicating details of and investigating complaints between the contractor and the local authority was recommended (to also be included as part of the Outline Code of Construction Practice).</p> <p>NNDC considered it is important that the OTMP and OCoCP 'talk' to each other consistently so that contractors are fully aware of their obligations and what will be expected of them in terms of process should any complaints arise during the construction phase.</p> <p>On-going discussions between the Applicant and NNDC will now address the above concerns with updates to be provided within the OCoCP and OTMP for Deadline 10.</p> <p>Subject to the OTMP and OCoCP being updated as indicated, NNDC's concerns will have been addressed and this matter can be considered as agreed.</p>	

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
	<p>The impact assessment presented within ES Chapter 25 (document reference 6.1.25, APP-238) identifies that enhanced mitigation measures in the form of noise barriers would be required at receptor LFR2H at the landfall during night time working under Scenario 1 (Table 25.39, ES Chapter 25 (APP-238)). To achieve an approximate noise reduction of up to 1.5dBA to bring noise levels down to not significant. A 1.5dBA reduction represents the worst case noise exceedance and would be readily achievable with standard noise absorption fencing. The exact specification of any noise barriers that may be required to mitigate significant residual construction noise will be determined during detailed design based on the confirmed list of plant and equipment. Noise barriers will be introduced with the appropriate specification for the location and noise reduction required.</p> <p>A Construction Noise (and vibration) Management Plan (CNMP) will be included in the final CoCP, as required under Requirement 20 (2)(e) of the draft DCO (APP-020). The outline CoCP (REP8-003) commits the Applicant to delivering a CNMP, which will apply throughout that stage of construction and will detail standard mitigation (best practical means) and where applicable, enhanced mitigation measures (noise barriers etc.). The final CoCP (including the relevant CNMP) for works within North Norfolk would require approval by North Norfolk District Council.</p>	<p>NNDC note the mitigation measures described including enhancement mitigation such as noise barriers and that this will be covered within the CNMP and OCoCP and Requirement 20.</p>	<p>Agreed</p>

	<p>As part of the communication liaison process set out in the outline CoCP (REP8-003), section 2.4, a complaints procedure will be established. Any complaints will be logged, investigated and, where appropriate, rectifying action will be taken. The details of the complaints procedure, including the mechanism for informing NNDC when complaints are received and to enable NNDC to make the contractor aware of complaints coming directly to the local authority will be agreed through the production of the final CoCP produced post-consent. The final CoCP would be submitted to, and approved by, the relevant planning authority prior to any works commencing for that stage. For works in North Norfolk District the relevant planning authority will be North Norfolk District Council.</p> <p>The OCoCP and OTMP have been updated to include: <i>‘Any complaints received should be shared with the relevant local authority in a timely manner, where complainant consent is given, to enable the local authorities to undertake their duties to investigate complaints relating to construction activities and respond within an agreed timeframe.’</i> Updated documents to capture this commitment to be submitted at Deadline 10.</p>	<p>Following continued dialogue, NNDC remained of the view that the communication plan should ensure that complaints received by the contractor are shared with the local authority in a timely manner, where complainant consent is given, to enable the local authorities to undertake their duties to investigate complaints relating to construction activities and respond within an agreed timeframe.</p> <p>An agreed method of communicating details of and investigating complaints between the contractor and the local authority was recommended (to also be included as part of the Outline Code of Construction Practice).</p> <p>NNDC maintained that because the Local Authority have a duty to investigate noise complaints, a mechanism needs to be in place for the relevant local authority to be made aware of complaints and also for the relevant local authority to make the contractor aware of any complaints that come direct to the local authority.</p> <p>NNDC also considered it important that the OTMP and OCoCP ‘talk’ to each other consistently so that contractors are fully aware of their obligations and what will be expected of them in terms of process should any complaints arise during the construction phase.</p> <p>On-going discussions between the Applicant and NNDC will now address the above</p>	<p>Agreed subject to the OTMP and OCoCP being updated.</p>
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Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
		<p>concerns with updates to be provided within the OCoCP and OTMP for Deadline 10.</p> <p>Subject to the OTMP and OCoCP being updated as indicated, NNDC's concerns will have been addressed and this matter can be considered as agreed.</p>	
	<p>The production of a Code of Construction Practice (CoCP), including a Construction Noise and Vibration Management Plan and Operational Noise Management Plan (based on the OCoCP, (REP8-003)) will provide sufficient mitigation for potential impacts on noise, vibration and air quality.</p>	<p>NNDC consider that the measures set out in the draft DCO (version 5) (Requirement 20 - Code of Construction Practice and Requirement 26 – Construction Hours) provides an effective way to help minimise any adverse impacts during the construction phase and will work with the applicant to ensure the DCO requirement drafting delivers its intended purpose.</p>	Agreed
Wording of Requirement(s)	<p>The wording of Requirement 20 provided within the draft DCO (and supporting certified documents) for the mitigation of impacts associated with noise and vibration and air quality are considered appropriate and adequate.</p>	<p>NNDC consider that the measures set out in the draft DCO (version 5) (Requirement 20 - Code of Construction Practice and Requirement 26 – Construction Hours) provides an effective way to help minimise any adverse impacts during the construction phase and will work with the applicant to ensure the DCO requirement drafting delivers its intended purpose.</p>	Agreed
	<p>In relation to Requirement 26(2)(h), daily start up or shut down is outside of the specified construction hours and is intended to allow activities in connection with good practice site management and safety measures. It would include, for example, personnel arriving to site in advance of shift start</p>	<p>NNDC welcomes the commitment from the Applicant in relation to daily start up and shut down as to be set out within an updated OCoCP as linked to Requirement 26.</p>	Agreed

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
	<p>time, undertaking daily site health and safety inspections and the provision of tool box talks. This will ensure that the site is open and ready to accept deliveries promptly from 7am. Such activities would only be permitted to the extent that they were considered 'non-intrusive'.</p> <p>The mobilisation period associated with any of the onshore construction works would be subject to the normal consented construction hours.</p> <p>Further to this the Applicant has provided the details and timings of start-up / shut down activities within section 3.2 of the OCoCP (REP8-003).</p>		

2.9 Onshore Cultural Heritage

38. The project has the potential to impact upon onshore archaeology and cultural heritage. Chapter 28 Onshore Archaeology and Cultural Heritage of the ES (document reference 6.1.28 of the Application, APP-241) provides an assessment of the significance of these impacts.
39. Details on the Evidence Plan Process for onshore archaeology and cultural heritage can be found in Consultation Report Appendix 9.25 (document reference 5.1.9.25 of the Application, APP-062) and Appendix 28.1 (document reference 5.1.28.1 of the Application, APP-192).
40. Table 9 outlines the topics for agreement with respect onshore cultural heritage between North Norfolk District Council and the Applicant.

Table 9 Agreement Log - Onshore Cultural Heritage

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
Existing Environment	Sufficient survey data (extent/duration) as presented in section 28.5.2 of ES Chapter 28 (APP- 241) has been collected to inform the assessment.	<p>NNDC consider that the commitment by Vattenfall to use HVDC transmission has, amongst other things, negated the need for onshore cable relay stations and has narrowed with width of the cable corridor. This means that, whilst there will be some impacts to heritage assets and their settings, this impact will occur primarily at construction stage and are therefore of a temporary nature.</p> <p>These impacts are all on the ‘less than substantial’ scale and the operational phase of the windfarm is considered unlikely to result in unacceptable impacts. On this basis, the considerable public benefits associated with the windfarm would more than outweigh the ‘less than substantial’ harm to heritage assets within North Norfolk.</p>	Agreed in relation to cultural heritage matters
	It is accepted that outstanding geophysical surveys (scheme-wide) (section 28.7.2.2 ES Chapter 28 (APP-241) may be undertaken post-consent.		
	The approach to the selection of priority geophysical survey areas (Appendix 28.2 of the ES, document reference 6.3.28.2 of the Application, APP-677 to APP-670) was appropriate and sufficient to inform the assessment of impacts.		
	Heritage setting viewpoint locations as listed in Table 28.11 of ES Chapter 28 (APP-241) and included in Appendix 28.4 (APP-672) are representative and appropriate.		
	Archaeological trial trenching is not required to inform the assessment of impacts pre-application. Further evaluation will be completed post-consent.		
Assessment methodology	The impact assessment methodologies used for the assessment (DMRB Volume 11, Section 3, Part 2: Cultural Heritage) as presented in section 28.4 of ES Chapter 28 (APP-241) provide an appropriate approach to assessing potential impacts of the project.	<p>In respect of archaeology, NNDC would defer to the advice of Norfolk County Council Historic Environment Service who provide advice to North Norfolk District Council in relation to all matters of archaeological heritage.</p>	
	The worst case assumptions for Scenario 1 and Scenario 2 as outlined in Table 28.17 and Table 28.18 respectively in ES Chapter 28 (APP-241) are considered appropriate.		
	The assessment adequately characterises the baseline environment in terms of onshore archaeology and cultural heritage including the setting of designated heritage assets (section 28.6 of ES Chapter 28, APP-241).		
	The scope of the Archaeological Desk Based Assessment (Appendix 28.1 of the ES, document reference 6.3.28.1, APP-66) is appropriate to inform the assessment.		

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
Assessment findings	<p>The assessment of impacts of both scenarios for construction, operation and decommissioning presented in section 28.7 of ES Chapter 28 (APP-241) is appropriate and, assuming the inclusion of the mitigation described and commitment to further evaluation post-consent, impacts on onshore archaeology and cultural heritage are likely to be non-significant in EIA terms.</p> <p>The assessment of cumulative impacts of both scenarios presented in section 28.8 of ES Chapter 28 (APP-241) is appropriate and, assuming the inclusion of the mitigation described, cumulative impacts on onshore archaeology and cultural heritage are likely to be non-significant in EIA terms.</p>		
Approach to mitigation	<p>The provision of a pre-construction and construction Archaeological Written Scheme of Investigation (WSI) (Onshore) (to be based on the outline WSI, document reference 8.5 of the Application, APP-696) is considered suitable, with respect to Set-Piece Excavation (SPE); Strip, Map and Sample and archaeological monitoring/watching brief scenarios.</p> <p>The mitigation proposed for both scenarios for potential impacts section 28.7 of ES Chapter 28 (APP-241) on buried and above-ground archaeological remains is appropriate.</p>		
Wording of Requirement(s)	<p>The wording of Requirement 23 provided within the draft DCO (APP-020) (and supporting certified documents) for the mitigation of impacts to onshore archaeology and cultural heritage are considered appropriate and adequate.</p>	<p>In respect of requirement 23, NNDC would defer to the advice of Norfolk County Council Historic Environment Service who provide advice to North Norfolk District Council in relation to all matters of archaeological heritage.</p>	<p>N/A</p>

2.10 Landscape and Visual Impact Assessment

41. The project has the potential to impact upon landscape and visual receptors. Chapter 29 Landscape and Visual Impact Assessment (LVIA) of the ES (document reference 6.1.29 of the Application, APP-242) provides an assessment of the significance of these impacts.
42. Details on the Evidence Plan Process for LVIA can be found in Consultation Report Appendix 9.19 (document reference 5.1.9.19 of the Application, APP-056).
43. Table 10 outlines the topics for agreement with respect to LVIA between North Norfolk District Council and the Applicant.

Table 10 Agreement log - Landscape and Visual Impact Assessment

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
Existing Environment	Based on the information available at the time the application was submitted (June 2019) sufficient survey data (extent/duration) was collected to inform the assessment. Agreed as part of the Evidence Plan Process. The revised Landscape Character Assessment and Landscape Sensitivity Assessment documents commissioned by the NNDC have been taken into consideration in for the ES and are referenced at section 29.6.2 of ES Chapter 29 (APP-242) and in Appendix 29.2 Existing Environment of the ES (document reference 6.3.29.2 of the Application, APP-678).	Agreed	Agreed
	The methodology (section 29.4 of ES Chapter 29, APP-242) and viewpoints (section 29.6.4, ES Chapter 29, APP-242) as selected are representative and appropriate. Agreed as part of the Evidence Plan Process.	Agreed	Agreed
Assessment methodology	The list of potential LVIA effects assessed in section 29.7 of ES Chapter 29 (APP-242) is appropriate. Agreed as part of the Evidence Plan Process.	Agreed	Agreed
	The impact assessment methodologies, including for cumulative impacts (section 29.4 of ES Chapter 29, APP-242) are appropriate for assessing potential impacts. Agreed as part of the Evidence Plan Process.	Agree	Agreed
	Visual impacts associated with the landfall and cable installation are limited to the construction phase and therefore an assessment of operational impacts was not required. (As agreed by way of the Norfolk Boreas	NNDC has no specific objection to the assessment methodology with regard to visual impacts. The position of both parties appears to be similar in seeking to ensure the minimum amount of tree, hedge and shrub loss to facilitate the project. Following amendments made to the	Agreed

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
	<p>Scoping Opinion, June 2017 (document reference 6.5 of the Application, APP-687).</p> <p>Landscape and visual impacts that occur during construction, such as the recovery of hedgerows and trees following removal, are assessed in full for the construction phase rather than operation (section 29.7 of ES Chapter 29, APP-242).</p> <p>Further to this under Scenario 2 the Applicant has committed to replacing trees as close as practicable to the location where they were removed. In the first instance this will be at an alternative location within the Order limits, but outside of the operational easement. Where this is not possible, other locations will be investigated outside the Order limits. This would be subject to landowner agreements. This will include on land adjacent to the Order limits but in the locality (subject to agreement with the landowner) or another location in the district (as close of possible to the original location) where landowner agreement for tree planting has been secured. If landowner agreement cannot be secured for replacement tree planting as close as practicable to the location where they are removed, Norfolk Boreas Limited and/or its appointed contractor will provide an alternative scheme or schemes for replacement tree planting ensuring no net loss of trees within North Norfolk. This is captured within an update to the Outline Landscape and Ecological Management Strategy (OLEMS) (REP8-005) and secured through Requirement 19 of the draft DCO (REP7-003).</p>	<p>Draft DCO at Version 6 (REP7-003) which included amendments to Article 27 (12) and Requirement 19, the requested ten-year replacement period for trees, shrubs and hedgerows within North Norfolk has now been secured and NNDC welcome this inclusion.</p> <p>NNDC are content with the proposal to replace trees as close as practicable to the location where they were removed as set out in the updated OLEMS (REP8-005).</p>	

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
	<p>In addition, the Applicant has committed to 10 years of post-planting maintenance for replaced trees within North Norfolk, This is secured through Requirement 19 of the draft DCO (REP7-003) and captured in the OLEMS (REP8-005).</p> <p>Under Scenario 1 hedgerows removals in North Norfolk will be undertaken by Norfolk Vanguard and no additional removals are required by Norfolk Boreas.</p>		
	<p>The worst case assumptions for Scenario 1 and Scenario 2 as outlined in Tables 29.8 and Table 29.9 respectively in ES Chapter 29 (APP-242) are considered appropriate. The worst case assumptions are based on HVDC technology with no requirement for a cable relay station. The wording of the Requirements within the draft DCO do not permit the construction and operation of a cable relay station.</p>	<p>Agree – subject to the scheme not subsequently being amended to HVAC (with associated onshore cable relay station).</p>	Agreed
Assessment findings	<p>The assessment adequately characterises the visual baseline (section 29.6 of ES Chapter 29, APP-242).</p>	<p>Agreed</p>	Agreed
	<p>The assessment of effects of both scenarios for construction, operation and decommissioning presented in section 29.7 of ES Chapter 29 (APP-242) is appropriate and adheres to the agreed methodology.</p>	<p>Agreed</p>	Agreed
	<p>The assessment of cumulative effects of both scenarios is appropriate and, assuming the inclusion of the mitigation described, cumulative effects would be mitigated over time.</p>	<p>Agreed</p>	Agreed
Approach to mitigation	<p>Under Scenario 2 the Applicant has committed to seeking to avoid mature trees during construction where possible through micro-siting the cable route in order to retain as many trees as possible. To assist with this the Applicant has committed to a reduced working width at hedgerows (reduced to up to 16.5m). However,</p>	<p>Following amendments made to the Draft DCO at Version 6 (REP7-003) which included amendments to Article 27 (12) and Requirement 19, the requested ten-year replacement period for trees, shrubs and hedgerows within North Norfolk has now been secured and NNDC welcome this inclusion.</p>	Agreed

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
	<p>it is not possible to replace trees within this gap as this would be above the operational cables.</p> <p>The Applicant will commit to replacing trees as close as practicable to the location where they were removed, outside of the permanent operational easement and ensuring no net loss of trees within North Norfolk. With this commitment to replace trees as close as possible to the location where they are removed, combined with reinstatement of the hedgerow, will assist in minimising the identified impact.</p> <p>Under Scenario 1 hedgerows removals in North Norfolk will be undertaken by Norfolk Vanguard and no additional removals are required by Norfolk Boreas.</p> <p>The Applicant produced a Clarification Note on the Trenchless Crossing at Colby Road, updated at Deadline 8 [REP-0298] and has provided a Position Statement on Church Road, Colby (REP7-035)</p> <p>The Applicant has considered the alternative suggestion by NNDC but does not feel that this option is a suitable alternative as it does not avoid tree losses on Church Road and would introduce new visual impacts for a new visual receptor (Hall Farm residence), would introduce significant construction traffic within 20m of a residential property (48 daily HGV movements for 8-10 weeks) and introduces potential highway safety concerns resulting from the arrangement of three road junctions in close proximity on a bend in the road.</p> <p>As detailed in the Position Statement on Church Road, Colby (REP7-035) the Applicant has undertaken a high-</p>	<p>NNDC are content with the proposal to replace trees as close as practicable to the location where they were removed and the general approach to mitigation as set out in the updated OLEMS (REP8-005) and secured within Requirements 18 and 19.</p> <p>In respect of Church Road, Colby, NNDC notes the applicant's response to Q3.5.3.8 and Q3.12.0.5 in their Deadline 7 response (REP7-017). This is also supplemented by the applicant's Position Statement Church Road, Colby (REP7-035) which considers the alternative proposals put forward by NNDC at Deadline 5 (REP5-067).</p> <p>The ExA will no doubt be aware that the primary issues raised by NNDC in relation to Church Road, Colby was to seek to minimise the loss of trees and hedgerows. The evidence presented by NNDC at Deadline 5 in response to ExQ2.12.0.3 identified six 'Important Hedgerows' affected by the project in this area alone where the LVIA noted 'loss of any trees here would have a significant effect'. If hedge and tree loss can be avoided, then this should be explored. NNDC welcomes the applicant undertaking the further work within the Position Statement.</p> <p>Whilst it is perhaps considered inevitable that within this document the applicant seeks to distance themselves from and have arguably overstated the negative impacts associated with the alternative proposal, what the Position Statement has helpfully provided is a more detailed analysis of how the open-cut trenching would affect the trees along Church Road, helpful detail that was</p>	

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
	<p>level survey to establish, in approximate terms, which trees would be likely to be removed to accommodate the trench crossing and to illustrate the potential for some replacement trees to be included, along with the replacement of the hedgerows, as part of the mitigation planting. The survey identified three immature and one semi-mature tree will require removal and that at least two replacements trees can be planted within the Order limits, with a further potentially be accommodated following detailed design.</p> <p>The Applicant’s final position is that owing to the very small number of trees being removed and the presence of existing notable gaps in the trees cover already at this location, the change brought about by the loss of these four trees will not notably alter the baseline landscape character. Replacement planting of hedgerows would ensure the sense of enclosure on Church Road could be restored once the hedgerows matured. The Applicant has committed to replacing all trees within North Norfolk to ensure no net loss. To further mitigate potential impacts micro-siting of the cable will be undertaken to limit tree removal and to target smaller specimens for any tree removal required, as well as to maximise the opportunity for replacement trees to be planted within the Order limits.</p> <p>If all replacement tree planting cannot be accommodated within the Order limits (subject to detailed design post-consent) then they will be replaced as close as practically possible, ideally further along to ensure no net loss of trees on Church Road (subject to landowner consent outside of the Order limits). The</p>	<p>missing from the project to date including the clarity as to which trees would have to be removed.</p> <p>Whilst NNDC do consider that the loss of the four identified trees would likely affect the character of this part of Church Road, as set at Deadline 5, ultimately it is a matter of planning judgment for the ExA in weighing the loss of trees against the public benefit of the project.</p> <p>NNDC certainly do welcome the proposed inclusion of text within the OLEMS document as set in paragraph 29 of the Position Statement. This should be included within the final OLEMS document and which will help guide contractors when undertaking works in the area.</p> <p>On balance, NNDC is prepared to withdraw its request for trenchless crossing under Church Road Colby on the provision that the applicant makes every effort to protect as much of the identified Important Hedgerows and as many of the trees in the areas as possible and make a positive contribution to replanting to ensure no net loss of trees. This is secured within the updated OLEMS and through DCO Requirements 18 and 19.</p>	

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
	<p>OLEMS Section 9.1.3 (REP8-005) has been updated to capture this commitment.</p> <p>Given there will be no notable change in the landscape character of Church Road and that all tree losses will be replaced, this is considered sufficient to mitigate impacts from tree losses at this location.</p> <p>The mitigation proposed for both scenarios for LVIA section 29.7 ES Chapter 29 (APP-242) and detailed in the OELMS (REP8-005) are considered appropriate and adequate.</p>		
	<p>The Applicant will commit to replacing trees as close as practicable to the location where they were removed, outside of the permanent operational easement, and ensuring no net loss of trees within North Norfolk . In addition, the Applicant has committed to 10 years of post-planting maintenance for replaced trees and shrubs within north Norfolk, secured through Requirement 19 of the draft DCO (RE7-003)</p> <p>This is captured within an update to the Outline Landscape and Ecological Management Strategy (OLEMS) (REP8-005), secured through Requirement 18 of the draft DCO.</p>	<p>NNDC are content with the proposal to replace trees as close as practicable to the location where they were removed and the general approach to mitigation as set out in the updated OLEMS (REP8-005) and secured within Requirements 18 and 19.</p>	Agreed
	<p>Mitigation measures required for both scenarios are outlined in sufficient detail within the Outline Landscape and Environmental Management Strategy (OLEMS) (document reference 8.7).</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>	Agreed

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
	<p>As requested by NNDC the applicant agrees to include the following in within the OLEMS: <i>If 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 schemes for replacement tree planting ensuring no net loss of trees within North Norfolk.</i> This will be captured within an updated to the OLEMS [REP5-022].</p>	<p>NNDC welcomes the commitment from the Applicant to include the additional bullet point to para 147 of OLEMS (version 3).</p> <p>Of course, this is not carte-blanc for the Applicant to put replacement trees all in one or two locations where they have a willing landowner and it may helpful for the OLEMS to set out the likely process(es) they will go through when securing replacement trees which cannot be replaced in situ due to cable easements so as to guide the future actions of contractors and negotiators when delivering mitigation outcomes. Subject to this, NNDC are in general agreement with the content of the OLEMS.</p>	
Wording of Requirement(s)	<p>Requirement 18 of the draft DCO (document reference 3.1 APP-020) states that for each stage of the works a written landscape management scheme must be submitted to and approved by the relevant planning authority in consultation with Natural England. With regards to works in North Norfolk District the relevant planning authority would be NNDC. The submitted landscape management scheme will provide details of species composition, the process for replacing failed planting and role and responsibilities for managing and maintaining the planting.</p> <p>Requirement 18(2)(d) of the draft DCO (document reference 3.1) reads “details of existing trees and hedgerows to be retained with measures for their protection during the construction period”.</p> <p>Article 27 and Requirement 19 of the draft DCO (REP7-003) has been updated to secure a10 year aftercare period in North Norfolk as follows:</p>	<p>DCO Requirements 18 (Provision of Landscaping) is agreed.</p> <p>Following amendments made to the Draft DCO at Version 6 (REP7-003) which included amendments to Article 27 (12) and Requirement 19, the requested ten-year replacement period for trees, shrubs and hedgerows within North Norfolk has now been secured and NNDC welcome this inclusion.</p> <p>DCO Requirements 18 and 19 are therefore agreed</p>	Agreed

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
	<p>Article 27 <i>"(12) In this article "the maintenance period" means— i. for the district of North Norfolk, the period referred to in requirement 19(2) in relation to the maintenance of landscaping;</i></p> <p>Requirement 19 <i>"...(2) Any tree, hedge, or shrub planted within the district of North Norfolk as part of an approved landscaping management scheme that, within a period of ten years after planting, is removed, dies or becomes, in the opinion of the relevant planning authority, seriously damaged or diseased must be replaced in the first available planting season with a specimen of the same species and size as that originally planted unless a different species is otherwise approved by the relevant planning authority."</i></p> <p>On this basis, the wording of Requirements 18 and 19 and provided within the draft DCO (and supporting certified documents) for the mitigation of impacts in the LVIA are considered appropriate and adequate.</p>		

2.11 Tourism, Recreation and Socio-economics

44. The project has the potential to impact upon tourism, recreation and socio-economics. ES Chapter 30 Tourism and Recreation (document reference 6.1.30, APP-243) and ES Chapter 31 Socio-economics (document reference 6.1.31, APP-244) provide an assessment of the significance of these impacts.
45. Details on the Evidence Plan Process for tourism, recreation and socio-economics can be found in Consultation Report Appendix 9.20 (document reference 5.1.9.20 of the Application, APP-057).
46. Table 11 outlines the topics for agreement with respect to tourism, recreation and socio-economics between North Norfolk District Council and the Applicant.

Table 11 Agreement Log - Tourism, Recreation and Socio-economics

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
Existing Environment	<p>Appropriate datasets have been used to inform the assessments as outlined in Table 30.11 of ES Chapter 30 (APP-243) and Table 31.7 of ES Chapter 31 Socio-economics (APP-244).</p> <p>The datasets include a report produced by Destination Research in 2017 that considers the economic impact of tourism across all of Norfolk broken down to the district level. This data has informed the baseline environment.</p>	Agreed	Agreed
Assessment methodology	<p>The impact assessment methodologies used for tourism and recreation (section 30.4 of ES Chapter 30, APP-243) and socio-economics (section 31.4 of ES Chapter 31, APP-244) provide an appropriate approach to assessing potential impacts of the project.</p>	Agreed	Agreed
	<p>The worst case assumptions for Scenario 1 and Scenario 2 for tourism and recreation as outlined in Table 30.23 and Table 30.25 in ES Chapter 30 (APP-243) respectively and those for socio-economics as outlined in Table 31.27 and Table 31.29 in ES Chapter 31 (APP-244) are considered appropriate.</p>	Agreed	Agreed
	<p>The assessments in section 30.6 of ES Chapter 30 (APP-243) and section 31.6 of ES Chapter 31 (APP-244) adequately characterises the baseline environments in terms of tourism, recreation and socio-economics respectively.</p> <p>Within Chapter 30 Tourism and Recreation (APP-243) the Norfolk Coast AONB is identified tourism features of</p>	<p>NNDC would challenge the assumption set out at paragraph 259 that 'Outside of The Norfolk Coast AONB, the countryside of North Norfolk and Breckland is not regarded as a direct draw for tourism although it is well regarded by local recreational users and an intrinsic aspect of the visitor's experience'.</p>	Agreed

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
	<p>national importance, and footpaths, cycles routes and coastal resorts are identified as tourism features of regional importance.</p>	<p>Due to high quality landscapes and the existence of many important heritage assets, tourism benefits are not just limited to areas within the Norfolk Coast AONB or coastal resorts. Many popular cycle and walking routes are located outside of the AONB.</p> <p>NNDC note the position of the applicant which confirmed that footpaths, cycles routes and coastal resorts are identified as tourism features of regional importance</p>	
<p>Assessment findings</p>	<p>The assessment of effects of both scenarios for construction, operation and decommissioning presented in sections 30.7 in ES Chapter 30 (APP-243) and 31.7 in ES Chapter 31 (APP-244) is appropriate and, assuming the inclusion of the mitigation described, impacts on tourism, recreation and socio-economics are likely to be non-significant in EIA terms.</p> <p>The Applicant considers that 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).</p> <p>Under Scenario 2 in order to minimise impacts and disruption, the onshore duct installation process will be undertaken in a sectionalised approach. Workfronts will operate from mobilisation areas distributed along the cable route. Each workfront will work on a short length (approximately 150m) to excavate, install ducts, backfill</p>	<p>The onshore cable route goes through some attractive and sensitive parts of North Norfolk District, especially between Happisburgh and North Walsham and this area is attractive to tourists throughout the year and host to visitor accommodation, facilities and some attractions including walking and cycling. In this regard, whilst North Norfolk District Council believes the long-term impacts of the cable route on the tourism economy will be benign, the Council has very significant concerns that during the cable corridor construction phase there will be significant impacts on local tourism businesses such that the construction works will have a significant impact on the income of tourism businesses in the Happisburgh to North Walsham area, which needs slightly greater recognition by Vattenfall.</p>	<p>Not Agreed</p>

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
	<p>and reinstate. Works on each 150m section from topsoil strip to reinstatement would take approximately 2 weeks (see Chapter 5 Project Description APP-218 for further detail).</p> <p>Under Scenario 1 ducts will be installed by Norfolk Vanguard.</p>	<p>NNDC note the updated position of the applicant during the Norfolk Vanguard examination which confirmed that works on each 150m section from topsoil strip to reinstatement would take approximately 2 weeks. However, this does not take account of the position of mobilisation area compounds and the landfall location which will result in disturbance impacts over a much longer duration. Whilst these will no doubt be appropriately managed through the CoCP and TMP, this cannot entirely remove the likelihood of lost tourism trips and local tourism spend attributed to the impact of onshore construction works taking place, which may also affect repeat bookings and spend. The applicant does not appear to recognise this potential impact on small tourism businesses nor has an appropriate mitigation strategy been proposed. Whilst the impact on local tourism may not be considered 'significant' at a regional level, at a local level the impacts have the potential to be lasting and, in some cases could be permanent if businesses are forced to close due to loss of trade attributable to the impact of construction activities affecting tourism draw.</p> <p>At the Issue Specific Hearing on 21 January 2020 the ExA held over for written questions an update on discussions regarding the impact of the cable</p>	

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
		<p>corridor construction on local tourism and businesses. NNDC provided a further update following the Issue Specific Hearing on 21 January 2020 at Deadline 4 [REP4-031 (Section 5).</p> <p>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].</p> <p>NNDC also notes the Applicants response to EXQ3.13.2.1 across pages 132 to 136 of the Applicant's Responses to the Examining Authority's Third Round of Written Questions [REP7-017].</p> <p>The applicant continues to seek to downplay the impacts from this project on tourism and refuses to accept the tourism impacts asserted by NNDC.</p> <p>NNDC's position remains that if business owners in NNDC suffer as a result of the Actual Tourism Impact of Negative Perceptions associated with the individual and cumulative impact of windfarm cable route works, it would be neither fair or reasonable that those businesses should be affected as a result of the turbine project without some form of mitigation strategy being in place.</p>	

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
	<p>The assessment of cumulative effects for both scenarios as outlined in section 30.8 of ES Chapter 30 (APP-243) and section 31.8 of ES Chapter 31 (APP-244) are appropriate and, assuming the inclusion of the mitigation described, cumulative impacts on tourism, recreation and socio-economics are likely to be non-significant in EIA terms.</p>	<p>Agreed – some potential for wider impacts if Vanguard and Boreas are delivered concurrently but impacts would be relatively short-term.</p>	<p>Agreed</p>
<p>Approach to mitigation</p>	<p>Embedded mitigation related to tourism, recreation and socio-economics are detailed within ES Chapter 30 Tourism and Recreation (APP-243) and ES Chapter 31 Socio-economics (APP-234), which include:</p> <ul style="list-style-type: none"> • Commitment to HVDC technology; • Under Scenario 2 onshore cable duct installation strategy is proposed to be conducted in a sectionalised approach in order to minimise impacts; • Long HDD at the landfall (avoiding interaction with the beach and the coastal path); and • Commitment to not use the Happisburgh beach car park; <p>Mitigation associated with potential noise and vibration, air quality, and general disturbance impacts are captured within the outline CoCP (document reference 8.1)</p> <p>Mitigation measures associated with potential construction traffic impacts are detailed with the outline Traffic Management Plan (document reference 8.8).</p>	<p>NNDC’s position remains that if business owners in NNDC suffer as a result of the Actual Tourism Impact of Negative Perceptions associated with the individual and cumulative impact of windfarm cable route works, it would be neither fair or reasonable that those businesses should be affected as a result of the turbine project without some form of mitigation strategy being in place.</p>	<p>Not Agreed</p>

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
	<p>Mitigation measures associated with potential landscape & visual and ecological impacts are detailed within the OLEMS (document reference 8.7).</p> <p>Mitigation measures associated with the temporary disturbance to users of Public Rights of Way (PRoW) are set out in the PRoW Strategy (document reference 8.4 of the Application, APP- 695).</p> <p>With these measures fully implemented no significant impacts have been identified associated with tourism & recreation and socio-economic receptors.</p> <p>A Construction Liaison Committee will be established in advance of construction as well as the appointment of a Community Liaison Officer. This will ensure effective and open communication with local residents and businesses that may be affected by the construction works. This is secured within the outline CoCP and through Requirement 20 of the draft DCO.</p> <p>In addition, Norfolk Boreas Limited is committed to exploring options for delivering a provision for communities, with the aim of recognising hosts and accounting for change, where benefits acknowledge and address tangible local change. The form of the benefit and its purpose will be explored with relevant stakeholders at the appropriate time, separate to the DCO process.</p>		

Topic	Norfolk Boreas Limited position	North Norfolk District Council position	Final position
Wording of Requirement(s)	The wording of the Requirements provided within the draft DCO (and supporting certified documents) for the mitigation of impacts to tourism, recreation and socio-economics are considered appropriate and adequate.	<p>The applicant continues to seek to downplay the impacts from this project on tourism and refuses to accept the tourism impacts asserted by NNDC.</p> <p>The ExA are faced with a stark choice between the position of the applicant with no tourism mitigation against the sensible precautionary approach being advocated by NNDC which includes appropriate mitigation in the form of the Requirement wording suggested by NNDC at Deadline 2 [REP2-087] (Pages 32/33 – para 14.21).</p>	Not Agreed

The names inserted below are to confirm that these are the current positions of the two parties contributing to this SOCG

Printed Name	Geoff Lyon
Position	Major Projects Manager
On behalf of	North Norfolk District Council
Date	05 May 2020

Printed Name	Jake Laws
Position	Norfolk Boreas Consents Manager
On behalf of	Norfolk Boreas Limited (the Applicant)
Date	04 May 2020