

Norfolk Boreas Offshore Wind Farm Applicant's response to Open Floor Hearing 2

Applicant: Norfolk Boreas Limited
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Glossary

AILs	Abnormal Indivisible Loads
CIA	Cumulative Impact Assessment
ExA	Examining Authority
dDCO	Draft Development Consent Order
DCO	Development Consent Order
ES	Environmental Statement
ExA	Examining Authority
HIS	Highway Intervention Scheme
HP3	Hornsea Project Three
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
NCC	Norfolk County Council
OLEMS	Outline Landscape and Ecological Management Scheme
OFH	Open Floor Hearing
OTMP	Outline Traffic Management Plan
RSA	Road Safety Audit
SoCG	Statement of Common Ground
SoS	Secretary of State
VWPL	Vattenfall Wind Power Limited

Applicant's response to the Open Floor Hearing Two

1. Introduction

- 1.1 A virtual second Open Floor Hearing (**OFH2**) for the Norfolk Boreas Development Consent Order (**DCO**) application took place on 2nd July 2020.
- 1.2 The Examining Authority invited the Applicant to respond in writing following OFH2. Many of the issues raised at the OFH have been addressed in the Applicant's previous submissions to the examination, the Applicant has therefore responded to the topics raised and provided cross-references to the relevant examination documents in the text below.

Reference	Topic	Applicant's Response
1.	<p>Application of the Highway Intervention Scheme (HIS) across projects</p> <p><i>Cawston Parish Council referenced the Requirements in the Norfolk Vanguard and Hornsea Project Three decisions and asked for clarity on what this means for the HIS developed by Norfolk Boreas and how this applies to other projects.</i></p>	<p>The Applicant can confirm that the revised HIS developed by Norfolk Boreas (detailed in the OTMP, Version 6 [REP10-016]) supersedes the earlier HIS developed by Orsted and that all three projects are committed to implementing the HIS to mitigate traffic impacts along the B1145 through Cawston. Norfolk Boreas have engaged with both Norfolk Vanguard and Hornsea Project Three (HP3) throughout the revision of the HIS to ensure an agreed approach by all projects. This commitment was confirmed in the <i>Applicant's responses to the ExA's fourth written questions [REP10-34] Q4.14.16</i> and the final Statement of Common Ground with Orsted HP3 [REP9-026] submitted at Deadline 9, which states <i>'The Applicant, Norfolk Vanguard Limited and Hornsea Project Three are committed to implement the finalised (Deadline 5) HIS as a single project mitigation or cumulative project mitigation.'</i></p> <p>Orsted HP3 also confirmed in their submission [REP11-026] agreement on the additional compliance measures agreed with Norfolk County Council (NCC) <i>'Hornsea Project Three also note that we have reviewed the Outline Traffic Management Plan (OTMP) submitted by the Applicant at Deadline 10 (Version 5, REP10-020) and are in agreement with the range of remedial intervention measures proposed to address possible driver compliance issues during the implementation of the Cawston Highway Intervention Scheme (as set out in Paragraph 4.3.2 - Link 34 – Cawston Highway Intervention Scheme).'</i></p> <p>Cawston Parish Council referred to Requirement 21 (5) in the Norfolk Vanguard DCO as made, which refers to, with respect to Link 34, <i>"traffic mitigation which is consistent with Norfolk Boreas Outline Traffic Management Plan..."</i>. This Requirement was put forward to the SoS by Norfolk</p>

		<p>Vanguard in their Response to the SoS's Consultation to provide an opportunity for Norfolk Vanguard to capture any development of the scheme of mitigation as agreed as part of the Norfolk Boreas examination. This reinforces and captures the commitment by VWPL that the changes to the HIS for Link 34 made by Norfolk Boreas would be adopted by Norfolk Vanguard.</p> <p>Cawston Parish Council also referred to Requirement 21 (4) within the Norfolk Vanguard DCO as made and in the proposed draft DCO for Hornsea Project Three (Requirement 18 (4)) which requires, for cumulative traffic in respect to the B1145 Cawston, <i>“revised details of a scheme of traffic mitigation which shall be submitted to, and approved in writing by, the relevant planning authority, in consultation with the highways authority”</i>. The HIS was initially developed by HP3 and subsequently adopted by Norfolk Vanguard. At the conclusion of the HP3 and Norfolk Vanguard examinations there were recommendations from the initial Road Safety Audit which needed to be addressed and this was an unresolved matter with NCC. It was therefore agreed with Norfolk Vanguard and HP3 that the Applicant would take forward and further develop the scheme. As such, a number of revisions have been made to the original scheme to address the concerns and recommendations and ensure it will effectively mitigate cumulative impacts. A summary of the development of the HIS by the Applicant is presented below:</p> <ul style="list-style-type: none">• The Applicant made a number of revisions to the HIS to address the recommendations of the initial Road Safety Audit (RSA) and NCC concerns. Full details of the revisions to the HIS are presented in Technical Note Revised Cawston HIS [REP4-016] submitted at Deadline 4 in January 2020 and are summarised below;<ul style="list-style-type: none">○ Design the scheme on a topographical layer rather than OS base;○ Use of the Cawston Parish Council kerbside parking survey results;○ Removal of footpath widening;○ Amendment to parking arrangements and details of formal parking restrictions (from 9am to 6pm);○ Details and updating of 20mph zone signage;○ Improvements to the Cawston C of E school pedestrian crossing;○ Minor carriageway realignment north side of the High Street adjacent to Chapel Street;○ Removal of mandatory priority traffic arrangement and replace with hazard warning signs;○ Clarification of road surfacing.
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		<ul style="list-style-type: none"> • The revised HIS was subject to another RSA by independent qualified road safety professionals in February 2020. • The RSA report was received by the Applicant's design team and the recommendations reviewed and all accepted. Full details of the RSA, including the RSA brief, RSA report and recommendations and the RSA decision log are presented in Revised Cawston HIS Road Safety Audit Decision Log [REP5-055]. • As a result of the acceptance of recommendations of the RSA the following was confirmed/amended and any changes captured in the updated OTMP submitted at Deadline 5 [REP5-025] including updated drawings presented in Appendix 6 [REP5-027]; <ul style="list-style-type: none"> ○ Note was added to the scheme drawings and the OTMP regarding the required on-going vegetation maintenance programme; ○ Confirmation of the exact location of the signpost at Chapel St; ○ Introduction of measures to highlight the presence of pedestrians, 'pedestrians in road ahead' signs added to drawing; ○ Confirmation of road markings and 20mph signage at all gateway features; ○ Confirming all signs will be attached to existing furniture where possible so as to not restrict footway width; ○ The OTMP was updated to contain a specific requirement for undertaking regular speed surveys and introduction of additional measures as necessary. • The RSA report and decision log [REP5-055] were reviewed by NCC's Development Control Panel, as the Overseeing Organisation, and a meeting held with NCC on the 15th March 2020 to discuss the RSA. During this meeting NCC indicated that no further amendments were required to the HIS and there were no remaining technical objections, but raised concerns over driver compliance. This was confirmed in their response to the ExA's third Written Questions (submitted at Deadline 8 [REP8-036]) which stated, <i>"Whilst the scheme passed the RSA, nevertheless NCC have raised a potential concern regarding driver compliance, namely that drivers may fail to yield at pinch points."</i> • As identified in the Applicant's comments on responses to the ExA's fourth written questions [REP11-007] Q4.14.1.1, further engagement was undertaken with NCC and the further intervention measures to address potential driver compliance issues have been agreed and included in the OTMP [REP10-016]. The key measure is the introduction of a period of continuous camera monitoring to inform further interventions measures should the driver compliance concerns manifest into evidenced occurrences. Continuous monitoring has allowed the inclusion of the potential intervention of an incremental
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		<p>reduction in daily HGV demand until the identified driver compliance issue has been rectified.</p> <p>As a result of the revisions to the HIS and further engagement with NCC, a Joint Position Statement with NCC on the HIS [REP11-016] was submitted at Deadline 11 which confirms agreement with NCC that the HIS is sufficient to mitigate against the traffic impact arising from the Project on Link 34 (Cawston) alone, and cumulatively with other projects.</p> <p>Following OFH2 the Applicant has engaged with Cawston Parish Council to offer a meeting to discuss the points raised in relation to the Norfolk Vanguard consent and how the HIS would work in practice between the projects. A virtual meeting was held on 20th July 2020 with Cawston Parish Council and interested parties to discuss matters relating to the HIS, for further details please refer to the Position Statement on the Meeting with Cawston Parish Council [ExA.AS-2.D13.V1].</p>
2.	<p>Concerns over Cawston Highway Intervention Scheme</p> <p><i>Cawston Parish Council expressed concerns over the number and nature of revisions to the HIS and consider it to be insufficient. They raised a number of specific concerns relating to pedestrian amenity, scope for delays and blockages and clarification on the intended use of abnormal loads by Hornsea Project Three.</i></p>	<p>Cawston Parish Council referred to the revisions which have been made to the HIS. As set out in response to item 1 above, the HIS has undergone a number of revisions during the Norfolk Boreas examination, firstly in response to concerns raised by NCC and the recommendations of the RSA for the original scheme and secondly following the recommendations of the RSA of the revised scheme. Details of all the revisions and the reasoning behind them have been clearly set out in the submissions made to the examination, i.e. the <i>‘Technical Note Revised Cawston HIS [REP4-016]’</i> and <i>‘Revised Cawston HIS Road Safety Audit Decision Log [REP5-055]’</i>. These documents provide an explanation of the changes made, including the removal of the footpath widening and additional signage and enforcement referred to by Cawston Parish Council. As revisions were made to the HIS, the details of the revisions were clearly presented in updates to the OTMP submitted at Deadline 5 [REP5-025] for revisions to the original scheme, Deadline 8 [RE8-007] following recommendations of the new RSA, and the scheme as agreed with NCC at Deadline 10 [REP10-016].</p> <p>The Applicant has continued to respond to and provide clarification on all the specific concerns raised by CPC throughout the examination on the HIS. This includes concerns raised over pedestrian amenity, carriageway width, oversailing wing mirrors and the potential for delays and blockages. The Applicant refers to the following submissions where detailed responses have been provided on these matters:</p>

		<ul style="list-style-type: none"> • Comments on Deadline 10 submissions and other submissions [REP11-008] Section 1.2 contains responses on concerns over highway geometry, narrow footways, and other HIS concerns including wing mirror oversailing and on-street parking. • Comments on Deadline 6 submissions and other submissions [REP7-016] Section 1.2 contains responses to concerns over the revised scheme and the results of the RSA. • The Applicant's response to the ExA's third written questions [REP7-017] contains responses on questions raised on the suitability of the HIS, the results of the RSA, HGV delivery periods and cumulative traffic effects. <p>In respect of the clarification on abnormal loads, the Applicant confirms that no Abnormal Indivisible Loads (AILs) will be taken through Cawston as part of the Norfolk Boreas project. The Applicant and NCC did indicate at the meeting on the 12th February 2020 that based on the weight and width restrictions secured in the HP3 Construction Traffic Management Plan [HP3 REP10-048] (paragraph 2.1.3.6), which indicates that AILs as defined by 'The Road Vehicles (Authorisation of Special Types) (General) Order 2003' would not be utilised, the Applicant's understanding was that HP3 were not using AILs through Cawston. The Applicant is engaging with HP3 to confirm their requirements with respect to AILs through Cawston.</p>
3.	<p>Cawston Alternatives</p> <p><i>Cawston Parish Council raised that better alternatives to the HIS are available and have been disregarded by the Applicant, suggesting that engagement has been disingenuous.</i></p>	<p>The Applicant refers to the <i>Applicant's comments on responses to the ExA's fourth written questions [REP11-007] Q4.14.1.7</i> where a response has been provided to Cawston Parish Council's position on the alternative traffic options, which refers to the <i>Applicant's response to the Third Written Questions [REP7-017] Q3.14.1.8</i> where the Applicant has given clear reasons why the alternative options are unworkable and disproportionate. In summary, they would not apply to either Norfolk Vanguard or Hornsea Project Three, there is already a solution agreed with NCC which mitigates traffic impacts in the form of the HIS, and the other options were never proposed in the pre-application consultation.</p> <p>The <i>Position Statement on Cawston Traffic [REP5-054]</i> and the <i>Applicant's response to the ExA's Further Written Questions [REP5-045] Q2.14.1.6</i> clearly sets out how the Applicant fully and properly considered the alternative options in terms of construction methodology, environmental impacts and land requirements.</p> <p>The Applicant remains of the position that compelling evidence has been submitted to the Examining Authority to rule out the alternative options. They are not proportionate alternatives to the HIS, especially since the agreed position between NCC and the Applicant is that the revised</p>

		<p>HIS is sufficient to mitigate traffic impacts on Cawston, both alone and cumulatively with other projects.</p> <p>Cawston Parish Council expressed their disaffection with the engagement undertaken, particularly with regard to the meeting held on 12th February 2020 which sought to explore alternatives, referring to it as a 'box ticking exercise'. The Applicant refers to the Applicant's comments on responses to the ExA's further questions [REP6-014] Q2.1.7 where it responded to the concerns Cawston Parish Council expressed over the meeting.</p> <p>Vattenfall is committed to open, proactive and meaningful engagement, in order to bring stakeholder views into the decision making process where appropriate and have previously successfully collaborated with Cawston Parish Council on the roadside car parking survey. The Applicant will take on board feedback and consider any lessons which can be learnt and look to ensure any engagement is as effective and constructive as possible.</p>
4.	<p>Cumulative effects with Dudgeon and Sheringham Shoal Offshore Wind Farm Extensions</p> <p><i>Cawston Parish Council raised concerns that further cumulative impacts will occur with these future developments.</i></p>	<p>The Applicant refers to the <i>Applicant's response to the ExA's written questions [REP-021] Q4.0.1</i> which provides a response with respect to the proposed Dudgeon and Sheringham Shoal extensions being developed by Equinor.</p> <p>In summary, only projects that are reasonably well described and sufficiently advanced to provide information, on which to base a meaningful and robust assessment should be included in the Norfolk Boreas CIA. The scoping report for the Dudgeon and Sheringham Shoal extension projects (October 2019) was not submitted until after the Norfolk Boreas application was accepted, and in any event the information provided in the scoping report is not sufficiently developed to enable inclusion of the extension projects within the Norfolk Boreas CIA at this stage. Therefore, any potential cumulative impacts of the projects with Norfolk Boreas will need to be considered as part of the Dudgeon and Sheringham Shoal extensions EIA and subsequent application.</p> <p>The SoS Scoping Opinion was issued on 18th November 2019 and it is understood that pre-application consultation is being undertaken. The development program (as per the Scoping Report) indicates that the Preliminary Environmental Information Report will be submitted in early 2021 and the subsequent DCO application will be submitted in Q3 2021.</p>

<p>5.</p>	<p>Design of onshore connection point</p> <p><i>Necton Parish Council raised that an integrated approach to connections of offshore wind farms is required. Request the project be refused until an acceptable connection strategy into the National Grid is proposed; either by swapping the connection points for HP3 and Norfolk Boreas or using the integrated connection strategy which will be enshrined shortly in a new regulatory framework.</i></p>	<p>The Applicant refers to ES Chapter 4 Site Selection and Assessment of Alternatives [APP-217] and ES Appendix 4.7 Identification of Onshore Cable Corridor [APP-543] which sets out the details of the site selection process including the identification of the National Grid connection points (including Norwich Main, the proposed connection point for HP3) and the refinement of the onshore cable corridor. An embedded mitigation has been the strategic approach to delivering Norfolk Boreas and Norfolk Vanguard, with a key factor of this being a commitment to a shared onshore and offshore cable route. Therefore, any change to the connection point for Norfolk Boreas would eliminate the ability to minimise environmental impacts from the colocation of infrastructure with Norfolk Vanguard, with a consented connection at Necton.</p> <p>The Applicant refers to the following submissions previously made regarding an integrated offshore connection approach:</p> <ul style="list-style-type: none"> • <i>Comments on Relevant Representations [AS-024], Table 1; Site Selection Item 4.</i> • <i>Response to the ExA's Further Written Questions at Q2.7.0.1 [REP5-045]</i> • <i>Response to the ExA's Third Written Questions at Q3.7.0.1 [RE7-017]</i> <p>The Applicant's position remains that significant progress needs to be made before defined proposals can be put forward for consent, let alone before the point of certainty that they will be implemented. As the expected construction time-frame for Norfolk Boreas is between 2024 and 2030, the Applicant considers that it would be impossible for an integrated offshore ring main approach to be developed, consented and delivered in time for Norfolk Boreas' first power generation. As such it would not be developed in time to facilitate connection to the Great Britain (GB) transmission system in order to meet the UK's energy demand profile. As raised previously by North Norfolk District Council (<i>Response to ExA's written questions Q7.0.4 [REP3-003]</i>) delaying projects currently in examination may be incompatible with the UK's commitment towards 'net zero' greenhouse gases, and any significant delay would also undermine the Climate Change Committee's recommendation in its Net Zero Report that the UK pursue a large increase in offshore wind. The Applicant's project is currently at an advanced stage in the consenting process and as acknowledged by Necton Parish Council at OFH2 must work within the constraints of the current regulatory framework.</p>
<p>6.</p>	<p>Onshore project substation location</p>	<p>The Applicant refers to the following submission previously made regarding the proposed alternative site at Top Farm;</p>

	<p><i>Necton Parish Council and Interested Parties referred to the rejection of the siting of the substation at an adjacent alternative site at lower ground levels (known as Top Farm). Referring to the conclusions of the SoS decision letter for Norfolk Vanguard on alternatives (para 8.4) and questioning the acceptability of the site and how alternatives were considered.</i></p>	<ul style="list-style-type: none"> • <i>Applicant's response to the Open Floor Hearing 1 [REP1-036], Reference 1;</i> • <i>Applicant's response to the ExA's Third Written Questions at Q3.9.2.1 [RE7-017];</i> • <i>Applicant's comment on response to ExA fourth written questions [REP1-007] Q4.9.2.3</i> <p>As stated in the <i>Applicant's response to the ExA's Third Written Questions [REP7-017] Q3.9.2.1</i> Top Farm was not specifically considered as an alternative to the current proposed location because Top Farm is located within the 3km search area around the existing Necton National Grid Substation that had previously been reviewed as part of the site selection process (detailed in ES Chapter 4 Site Selection and Assessment of Alternatives [APP-217]). Top Farm, would have two significant effects – moving the onshore project substation closer to more residential properties, including within the currently excluded residential buffer zones, and requiring significant earthworks in order to level the footprint, prior to commencement of construction works. Top Farm may be a preference for some, however, it is neither appropriate from an EIA perspective, nor does it reflect a consensus view of local residents.</p>
<p>7.</p>	<p>Visual impacts of onshore infrastructure</p> <p><i>Necton Parish Council and Interested Parties have raised concerns on the accuracy of the visualisation photomontages presented and that the mitigation proposals are unacceptable. Specially requesting the lowering of ground levels, installation of high earth bunds and use of mature planting.</i></p>	<p>The Applicant refers to previous submissions where the Applicant has responded to concerns raised regarding landscape and visual impacts at Necton (as set out in the list below). Particularly <i>REP6-013</i> which addressed concerns over the accuracy of the visualisations and confirms that all visualisations are produced to SNH guidelines as set out in 'Visual Representation of Wind Farms Version 2.2' (February 2017). Great care has been taken to conform to these standards to ensure the visualisations are as accurate as possible. Terrain 5 DTM is a data source purchased from Ordnance Survey, therefore we cannot rectify any inaccuracies inherent in this data. However, any inaccuracies that do occur in Terrain 5 DTM will not affect the height of the substation as shown in the models or the photomontages.</p> <ul style="list-style-type: none"> • <i>AS-024 Applicant's comments on Relevant Representations [AS-024] Section 1.24 Landscape and Visual;</i> • <i>REP3-007 Applicant's comment on Written Representations and Additional Submissions [RE3-007] Sections 1.7 and 2.4;</i> • <i>Written Summary of the Applicant's Oral Case at Issue Specific Hearing 3 Onshore effects including the draft Development Consent Order [REP4-013], Agenda Item 4 Landscape and Visual Effects b) Substations Necton;</i> • <i>Applicant's Responses to the Examining Authority's Further Written Questions [REP5-045] Q2.9.1.2 and Q2.9.1.3;</i> • <i>Applicant's Comments on Deadline 4 Submissions and Additional Submissions [REP5-051] Section 1.17;</i> • <i>Applicant's Comments on Deadline 5 Submissions [REP6-013] Table 1.8; and</i>

		<ul style="list-style-type: none"> • <i>Applicant's Comments on Deadline 6 Submissions and Other Submissions [REP7-016] Section 1.7 and 1.12.</i> • <i>Applicant's Comments on Deadline 7 submission [REP8-014] Section 1.2</i> <p>The Applicant also refers to the <i>Applicant's comments on responses to the ExA's further Written Questions [REP6-014] Q2.5.2.2 and Q2.9.6.4</i> where the Applicant has provided a detailed response to the specific points raised on bunds and ground levels. This includes why the creation of a 10m high bund or even 15m bunds are not appropriate.</p> <p>With regards to the maturity of the planting, as stated in the OLEMS [REP10-014] the Applicant has committed to mitigation planting of species which grow at various speeds to accelerate visual screening. As stated in OLEMS paragraph 51 <i>'the planting includes areas of fast growing woodland species as this would provide, most importantly the height required, as well as the density, to ensure effective screening.'</i> Further details on planting species and growth are detailed in OLEMS Section 6.6 which highlight that <i>'the mitigation planting would be designed to comprise a mix of faster growing 'nurse' species and slower growing 'core' species.'</i></p> <p>The Applicant also refers to the response provided to the ExA's First Written Questions Q9.1.7 [REP2-021] on the height of vegetation, which indicates that all estimates for planting growth are conservative in respect of guidance produced by the Institute of Environmental Management Assessment (IEMA) where a broad average of 7 to 7.5m height after 15 years is presented but with reference also made to many faster growing species.</p> <p>As detailed in the Written summary of the Applicant's oral case at ISH1 [REP1-041] the Applicant will explore opportunities for advanced planting, which could be implemented at the start of the construction phase, allowing approximately three years of growth prior to completion of construction.</p> <p>The details of the size and species of the planting will be developed as part of the detailed design and presented in the final Landscape Management Scheme is produced under Requirement 18 of the DCO, in accordance with the OLEMS, and approved by the planning authority. Furthermore, to ensure development of the planting to a satisfactory standard, there would be an agreed procedure for joint annual inspection of all planting areas by representatives of the relevant planning authority and Norfolk Boreas Limited at the end of each growing season and for each year of the aftercare.</p>
8.	Conditions and approval of landscape mitigation	The final Statement of Common Ground with Breckland Council [REP9-013] states that the agreed position on landscape mitigation is that <i>'All mitigation measures required for both scenarios are outlined in sufficient detail within the Outline Landscape and Environmental</i>

	<p><i>Necton Parish Council referred to the Breckland Council SoCG and that no visual conditions will be placed on the Applicant. As Breckland Council have to consider the whole of the district, Necton Parish Council therefore requested that the ExA impose mitigation restrictions and conditions in the design statement and that they are more than a consultee.</i></p>	<p><i>Management Strategy (OLEMS)'. The details on landscape planting are secured through the OLEMS [REP10-014], the details of the proposed landscape scheme will be developed post-consent and approved by Breckland Council which will include details of the location, number, species, size and density of any proposed planting.</i></p> <p><i>As detailed in the OLEMS [REP10-014] 'During the development of the landscape management scheme for the onshore project substation, the use of bunding will be given further consideration as part of the overall detailed design. There will also be consideration regarding opportunities to extend the currently proposed new areas of woodland planting, potentially into parts of those areas currently identified for species rich grassland, and providing these do not compromise improvements to the provision for bio-diversity.'</i></p> <p>As secured in the Design and Access Statement [REP7-005], the Applicant will welcome Necton Parish Council's participation in consultation on the Design Guide and feedback on those aspects of the design which can be influenced, however it would not be appropriate for them to approve the final details. This is a responsibility entrusted to Local Planning Authorities, who are used to making planning judgements and determinations in their local areas on behalf of all relevant parishioners, and not an individual Parish Council whose views may differ to that of other local Parish Councils.</p> <p>The Applicant refers to the <i>Applicant's comments on responses to the ExA's fourth written questions [REP11-007] Q4.9.6.4</i> where it has responded on why it is not necessary or appropriate to secure the conditions requested by Necton Parish Council in the Design and Access Statement.</p>
<p>9.</p>	<p>Compensation</p> <p><i>Necton Parish Council stated that Vattenfall had confirmed a "compensation fund" would be available. Necton Parish Council expressed that they would prefer funds be spent on mitigation. If not, then a specific/separate fund should be allocated to Necton given the magnitude and duration of the impacts at Necton.</i></p>	<p>The Applicant has secured embedded and further mitigation within the project proposals and construction methodologies so as to avoid and mitigate impacts, such that there is no need for compensation for any residents or businesses unless they are affected landowners for which powers of compulsory acquisition are exercised. However, the Applicant is engaged in facilitating means of ensuring wider socio-economic benefits associated with the Project including opportunities for the local population across Norfolk in areas such as jobs and skills development to encourage local people into a burgeoning sector which is regarded as important to the UK and to the local (New Anglia LEP) industrial strategy.</p> <p>Should the Project be consented and proceed to construction and operation, the Applicant will develop a voluntary Community Benefit fund. The Community Benefit fund would aim to acknowledge the role of communities hosting the project, and to empower them to live ever climate smarter lives. However, this is not material to the planning process or to the determination of this application. As stated in the Applicant's response to the ExA's written</p>

		questions [REP2-001] and Comments on responses to the ExA's written questions [REP3-003] Q5.8.1, only mitigation which addresses impacts directly associated with the Project should be considered in the planning and DCO process.
10.	<p>HVDC Technology</p> <p><i>N2RS reaffirmed their strong support for the commitment to HVDC considering this to be technology which minimises impacts and requesting that there should be no deviation from this commitment. Also raised concerns of effects from construction activities but had confidence that officials will ensure this is minimised as much as possible.</i></p>	<p>The Applicant is committed to using the HVDC transmission system and agrees with N2RS that this is the system which minimises the overall environmental impacts. Furthermore, the DCO would not consent the additional infrastructure which would be required for a HVAC transmission system, and therefore it would not be possible to implement a HVAC transmission system without a material change.</p> <p>The Applicant acknowledges the concerns with regards to effects from construction and suitable mitigation measures would be implemented through the relevant management plans, such as the final Code of Construction Practice, which are secured through the dDCO and would be approved by the relevant planning authority.</p>