

Norfolk Boreas Offshore Wind Farm Applicant's Comments on Deadline 14 Submissions

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Glossary of Acronyms

BoR	Book of Reference
CIA	Cumulative Impact Assessment
CNMP	Construction Noise Management Plan
CPC	Cawston Parish Council
DCO	Development Consent Order
dDCO	Draft Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
ExA	Examining Authority
HIS	Highway Intervention Scheme
MMO	Marine Management Organisation
NG	National Grid
OFH	Open Floor Hearing
OCoCP	Outline Code of Construction Practice
OLEMS	Outline Landscape and Ecological Mitigation Scheme
TMP	Traffic Management Plan

1 Applicant's Comments on Deadline 14 Submissions

1. This document contains the Applicant's comments on submissions by Interested Parties at Deadline 14 of the Norfolk Boreas Examination which the Applicant has not already responded to in previous submissions.
2. Please note the Applicant provided a response to the following at Deadline 15;
 - Applicant's comments on responses to the Examining Authority's fifth round of written questions [REP15-003] and
 - Applicant's response to Natural England and the Marine Management Organisation Deadline 14 submissions [REP15-004].

1.1 REP14-049, Mulbarton Parish Council, Onshore grid capacity

Summary of Submission	Applicant's Comments
<p>Review of connection locations for Norfolk Boreas, Hornsea Project Three and Dudgeon and Sheringham Shoal Extensions, including onshore grid capacity and offshore transmission links.</p>	<p>The Applicant refers to its response to Q 5.4.0.10 of the Examining Authority's fifth round of written questions [REP14-036] with respect to Mulbarton Parish Council's proposals for offshore transmission links. Specifically that these are alternatives which are not relevant to this stage of the development process of the Project and that both the Department of Business, Energy and Industrial Strategy and NG ESO are agreed that the Offshore Transmission Network Review should not affect those projects with an existing contracted position for grid connection.</p> <p>With respect to grid connection locations, the Applicant refers to Appendix 4.3 Strategic Approach to Selecting a Grid Connection Point[APP-539] which outlines the grid connection process which was conducted in conjunction with National Grid to ascertain the most economic and efficient electrical connection system for Norfolk Vanguard and Norfolk Boreas.</p> <p>Furthermore, the Applicant would note that the co-development and co-location of Norfolk Vanguard and Norfolk Boreas infrastructure to the same connection point, including the embedded mitigation of onshore duct installation for both projects (under Scenario 1) presents a co-ordinated and efficient development of two large scale offshore wind farms.</p>

1.2 REP14-050 Necton Parish Council Oral Contributions at Hearings

Summary of Submission	Applicant's Comments
<p>Written summary of oral contributions at Open Floor Hearing 3 (OFH3) on consideration of the cumulative effects on Norfolk landscape from the combined projects of Vanguard and Boreas.</p>	<p>Please refer to the Applicant's response to Open Floor Hearing 3 (OFH3) [REP13-015] where it has provided a response to issues raised at OFH3 on cumulative impacts (item 2) including potential landscape and visual impacts.</p>

1.3 REP14-060, Mid Norfolk Railway Preservation Trust

Summary of Submission	Applicant's Comments
<p>Mid-Norfolk Railway Preservation Trust confirms they have reached an agreement in principle on commercial terms and understands that the Applicant will be updating the Book of Reference at Deadline 16 to correct the error relating to the current use status of the railway. Accordingly in light of this, they withdraw their representation made on 17 August 2020.</p>	<p>The Applicant welcomes the withdrawal of the representation and will continue to engage positively with the Mid-Norfolk Railway Preservation Trust.</p> <p>The description in the Book of Reference (BoR) has been updated to reflect the active nature of the railway and the reference to 'disused' has been removed. An updated BoR will be submitted at Deadline 18 as per the updated examination timetable published on 4 September 2020 [PD-024].</p>

1.4 REP14-069, NSAG, Response to Baroness Cumberledge Judgement

Summary of Submission	Applicant's Comments
<p>1. Are you saying that this entire planning examination for Norfolk Boreas is a complete waste of time because in your eyes Boreas will have to be passed because Vanguard was passed? paragraph 28 says:</p> <p><i>"It is well established, as a general principle, that policies issued to guide the exercise of administrative discretion are an essential means of securing consistency in decision-making, and that such policies should be consistently applied...."</i></p> <p>Paragraph 46 says :</p> <p><i>"... no reasonable Secretary of State, aware of his responsibility for securing consistency in development control decision-making, would have failed to take reasonable steps to ensure that his own decisions on cases of the same kind, in the same district, taken within the same period, and which, for the same reason, he had recovered to determine himself, were consistent with each other....."</i></p> <p>2. Are you therefore implying that which you denied at first, ie that this was a 'tick box' exercise, is in fact true?</p> <p>3. Are you also saying that the ExA cannot make any changes which make Boreas different to Vanguard?</p>	<p>The Applicant has no further comment other than to reconfirm that the cumulative impacts of Norfolk Boreas and Norfolk Vanguard are being considered through the Norfolk Boreas examination process by the Norfolk Boreas ExA. Necessary and appropriate mitigation specific to the Norfolk Boreas application has been secured in the Norfolk Boreas dDCO and associated outline plans, and to the extent that it is necessary to secure further mitigation for impacts, including cumulative impacts, considered as part of the Norfolk Boreas examination, the correct approach is to secure this in the dDCO for Norfolk Boreas. The ExA has been clear from the outset that it is examining the Norfolk Boreas application afresh. Therefore, it remains open to the ExA to make recommendations which are not consistent with the Norfolk Vanguard decision but, to the extent that it does so, the Applicant considers that it would assist the Secretary of State if the ExA could clearly explain its reasons for doing so.</p>

1.5 REP14-070, NSAG, Substation fire

Summary of Submission	Applicant's Comments
<p>Concern regarding fire risk of substation with reference to a distribution substation fire which occurred on 15th August 2020 in Norfolk.</p>	<p>Major accidents and disasters are considered in section 5.6 in Chapter 5 Project Description of the Environmental Statement [APP-218]. The risk of substation fires is historically low; however, substation fires can impact the supply of electricity and create a localised fire hazard as was illustrated in the referenced news article.</p> <p>The design and operation of substations are regulated and controlled to the highest health and safety standards; and operators are required to develop emergency response plans and crisis management procedures as part of that regulatory process. The highest appropriate levels of fire protection and resilience will be specified for the onshore project substation to minimise the existing low fire risk.</p> <p>Substations are generally not a significant fire risk because of the measures put in place to minimise that risk. For example, any potentially flammable assets are not located near the perimeter of the infrastructure, and the ground materials and other physical barriers included in the design will contain fire to within the compound. Furthermore, the onshore project substation is located sufficiently distant from populated areas to further minimise the risk of fire hazard.</p>

1.6 REP14-071, NSAG, Pylons

Summary of Submission	Applicant's Comments
<p>Can the applicant please tell us if an extra pylon and overhead cable changes will need to be used whether both substations go ahead, or just one?</p>	<p>The Applicant can confirm that the National Grid overhead line works will be required under Scenario 1 (conducted by Norfolk Vanguard) or Scenario 2 (conducted by Norfolk Boreas).</p>

1.7 REP14-072 NSAG Site Selection

Summary of Submission	Applicant's Comments
<p>REP14-072 raises queries regarding site selection with reference to the use of Top Farm as an alternative site for the onshore project substation.</p>	<p>The Applicant refers to previous submissions where it has responded to questions regarding the siting of the onshore project substation, including consideration of the Top Farm site;</p> <ul style="list-style-type: none"> • Applicant's response to Open Floor Hearing 2 [REP13-014] Item 6; • Applicant's comments on responses to the ExA's fourth written questions [REP11-007] Q4.9.2.3. • Applicant's response to the ExA's third written questions at Q3.9.2.1 [REP7-017]; • Applicant's comments on responses to the ExA's written questions Q9.0.2 [REP3-003]; • Applicant's response to Open Floor Hearing 1 [REP1-036], Reference 1; <p>The Applicant would like to clarify the following with respect to potential transmission losses with reference to the National Grid fact sheet on High Voltage Direct Current – technical information ¹ <i>'Over short distances, the losses in both cables and overhead lines are very small. Losses in AC transmission are in the region of 0.7%–1% per 100km for an overhead line route and 0.3%–0.6% for a cable system'</i> rather than the 30-40% referred to.</p>

1.8 REP14-076 Polly Brockis, Deadline 14 Submission

Summary of Submission	Applicant's Comments
<p>REP14-076 refers to the drawings that had been provided by the Applicant and Ms Brockis remains concerned regarding the safety of the proposed HIS and how the angles and sight lines can be mitigated by driver compliance.</p>	<p>Full details of the Applicant's engagement with Ms Brockis, the material shared and interpretations are presented in the Applicant's responses to the ExA's fifth written questions [REP14-036] Q5.14.1.1 and the accompanying technical note [REP14-044].</p>

¹ <https://www.nationalgrid.com/sites/default/files/documents/13784-High%20Voltage%20Direct%20Current%20Electricity%20%E2%80%93%20technical%20information.pdf>

Summary of Submission	Applicant's Comments
<p>Specifically it is suggested in the representation that on the drawings provided by the Applicant smaller vehicles are used and placed immediately adjacent to the kerb. Sight lines are therefore not indicative of actual vehicles, positions or their driver views. With a HGV at the new waiting position, into the parking triangle, I would have to pull out to the centre of the road before I can see that vehicle, putting myself in obvious danger of the traffic coming from Chapel Street. This is already a difficult corner however the proposed scheme increases risk to an unacceptable level.</p>	<p>At the site meeting with Ms Brockis on the 31st July 2020 the Applicant presented sight lines and safe stopping distance (SSD) for a 30mph speed limit to facilitate a clear comparison of the HIS highway geometry with baseline conditions (the eastbound baseline speeds have been measured at 28.4 mph Road Safety Audit Decision Log [REP5-055, Appendix C] in the vicinity of White House Farm).</p> <p>This served to demonstrate that under current conditions a vehicle egressing White House Farm would have to encroach 1m onto the carriageway to achieve the required (SSD) visibility to eastbound approaching traffic for a 30mph approach speed. With the HIS geometric changes that encroachment distance would need to increase marginally by 200mm to achieve the required 30mph SSD visibility [REP14-044, TP-B5640- DR062].</p> <p>Due to the need to encroach onto the carriageway to achieve safe visibility in both baseline and HIS situations it was determined that the critical factor is the ability of drivers of eastbound traffic to view a vehicle egressing White House Farm in adequate time to react. For a baseline situation, drawing TP-PB564-DR061 [REP 14-044] demonstrates that the eastbound drivers SSD visibility is impeded by westbound vehicles. For the HIS geometry the situation is much improved and the requisite SSD visibility is achieved with no impedance.</p> <p>The resident acknowledged the information presented and requested further details on visibility for a 20mph speed limit (the design speed of the HIS) and visibility to a stationary HGV at the eastbound 'yield point'. It was also requested that further details of the visibility at the Chapel St, High St junction were provided.</p> <p>This information was submitted to Ms Brockis and is the subject of REP14-077 below.</p>

1.9 REP14-077 Polly Brockis, Further considerations and questions for the Applicant

Summary of Submission	Applicant's Comments
<p>REP14-077 states that Ms Brockis is still not assured of the safety of the proposed HIS. REP14-077 provides the response Ms Brockis provided to the Applicant, specifically referencing drawing TP -PB5640- DR066. 1 as an indication of how far a vehicle egressing White House Farm will need to travel into the road to gain sight of a yielded vehicle 2. For position of the yielded vehicle in relation to the access/ exit of Chapel Street 3. The travel path as drawn which denotes the HGV travelling west is actually riding against the kerb</p> <p><u>Letter provided to the Applicant;</u></p> <p>Thank you for the revised drawings changing vehicles to HGVs and technical notes. I see that on all these new drawings it is consistently acknowledged that the passenger side corner (leading edge) of my vehicle has to be 1.7 metres into the road before I can see the proposed HGVs travelling eastbound. The previous drawings stated only 1 metre out. I appreciate this has been corrected to a reality that can be physically measured but the phrase “no change” over these drawings is misleading. HGVs travelling in this direction are not a current occurrence. Vehicles are not heading to pull over into a yield/ hold position, I see vehicles in transit travelling along the High Street. This new scenario has HGVs beginning their movement from behind a corner out of my view.</p> <p>Drawing DR065</p> <p>In the technical notes your bullet point for this drawing it states a 27metre requisite forward visibility is required for the HGV to see a vehicle leaving our driveway. That measurement seems to be taken from the trailer, rather than the cab to the very corner sighting of my vehicle. From the drivers position to an actual visual of the car (when that driver is actually focused on looking for another HGV some 90m down the road) will be significantly less than that visibility requisite and stopping distance – and as drawn I am totally reliant on his/ her visual of me and stopping, I have no sight line of the vehicle at that time.</p> <p>On this drawing the yield point is shown to completely block the entry/ exit to Chapel Street. An immediate log jam scenario. Again I ask has anyone spoken to</p>	<p>The Applicant is committed to continuing dialogue with Ms Brockis and has been in contact to offer further engagement to clarify the technical information shared and address any residual concerns.</p> <p>For clarity the Applicant's response addresses Ms Brockis's points raised in the letter (to the Applicant) dated 24 August and appended to REP14-077, which also serves to address the additional points raised to the ExA.</p> <p><u>Change to White House Farm vehicle encroachment.</u></p> <p>Technical Note Entrance and Egress onto the B1145 [REP14-044, Drawing TP-PB5640- DR062] illustrates that a vehicle egressing White House Farm is required to encroach 1m into the carriageway to gain the safe visibility to eastbound approaching traffic for a 30mph speed limit in a baseline situation.</p> <p>The 20mph visibility drawings, Technical Note Entrance and Egress onto the B1145 [REP14-044, Drawing TP-PB5640-DR065 to DR067] illustrate that to achieve the SSD forward visibility for a 20mph speed limit a vehicle egressing White House Farm would have to encroach onto the carriageway 1.7m for the baseline situation. For the revised HIS geometry the same distance of encroachment is required for a 20mph limit (1.7m) and this is the referenced 'no change' situation.</p> <p><u>Drawing DR065</u></p> <p>Technical Note Entrance and Egress onto the B1145, [REP14- 044, Drawing TP-PB5640-DR065] illustrates a HGV at the eastbound yield point as requested by Ms Brockis. The eastbound 20pmh SSD forward visibility (to White House Farm) is projected through the HGV and serves to contextualise that an approaching HGV would have the requisite 27m forward visibility and at no point thereafter does the line of sight become obscured.</p> <p>It is acknowledged that eastbound HGVs yielding could partially block Chapel Street access/egress. This would be a momentary situation (a matter of seconds) and in the context of the baseline + cumulative HP3/NB traffic flow detailed in Technical Note Revised HIS [REP4-016] and Road Safety Audit Decision Log [REP5-055] would</p>

Summary of Submission

the businesses on Chapel Street, how many winery lorries have to make that turn daily? Are the yielding HGVs going to reverse to allow access? Could they?

Drawing DR067 – existing situation

This drawing shows existing visibility stating I currently have to come into the road by 1.7m to see a HGV travelling east. Currently I rarely see HGVs travelling in this direction, it must be acknowledged that traffic is far less than proposed and currently “larger” vehicles, i.e tractors or buses will travel down the centre of the road and I am able to see these way down the High Street before pulling out to any significant distance. Please note the blue parking bays detailed on this plan are overstated. Vehicles do not park directly opposite the Chapel Street access way because of the turning circle required by the winery lorries. This existing visibility drawing shows a bus driving west past my property. It is drawn as actual, taking that required road position slightly over the centre line to get the angle to drive down the High Street and avoid pedestrians on the one sided narrow pavements.

Drawing DR066 – proposed with HIS in place

With the HIS in place the HGV driving west past my property is drawn riding the kerb. A 90cm pavement against a high wall. If the HGV is placed in the same position from the kerb as the bus in DR067 and adding the width of wing mirrors into the equation there is conflict with my proposed forward position. The HGV at the triangle yield position will not be able to see beyond either of us to see what is following, yielding.

Drawing DR017

Plans at 1:500 are difficult to view and cannot be accurately scaled without the CAD package that they are drafted on. Marked visibility lines here pass over parking bays and skim wall/ pavement edges, indicating clear visibility distances that cannot be accomplished without eliminating all other traffic or parking. The scheme relies heavily on a sequence of vehicles waiting for opposing ones in a known pattern. Driver compliance may make this a possibility for the HGV drivers but you are proposing this for a village which already has a difficult road because of width and bends. There is everyday traffic in this scenario and they will not

Applicant’s Comments

not cause significant driver delay. The yield points formed part of the brief submitted to the Road Safety Audit team and no safety concerns were raised.

The design basis for the increased forward visibility, reduced speed limit and yield points is to ensure that drivers of HGVs are afforded the highway environment to react safely to other road users that may not otherwise be possible in the baseline situation.

This is augmented by the Applicant’s commitment to additional driver compliance measures and a commitment to engage with the winery pre commencement OTMP [REP 14-022, Section 5.6 and Table 3.5 respectively].

This whole package of measures will serve to mitigate the potential for HGV to HGV conflicts outlined in Ms Brockis’s response.

Drawing DR066

Technical Note Entrance and Egress onto the B1145, [REP14- 044, Drawing TP-PB5640-DR066] illustrates a westbound HGV traversing tight to the kerb (a layer that for consistency was lifted from drawings previously submitted to the examination and now contained in the OTMP Appendix 6 [REP14-024]) The layer was created to enable the design team to determine ‘pinch points’ and mitigate accordingly. Having established there is a pinch point outside of White House Farm, the design proceeded to create a yield point and ensure there is adequate visibility for all road users to react to the changes in the highway geometry to avoid vehicle to vehicle conflicts. The introduction of the yield point, will ensure that the path taken by the bus illustrated in Technical Note Entrance and Egress onto the B1145 [REP14-044, Drawing TP-PB5640-67] (which avoids pedestrian conflict) is more likely as there will not be an opposing traffic stream.

Technical Note Entrance and Egress onto the B1145, [REP14- 044, Drawing TP-PB5640-DR017], clarifies a westbound vehicle approaching from Aylsham Road has substantial forward visibility to the White House Farm access and is unlikely to come into conflict with a vehicle egressing and encroaching onto the carriageway. Equally, a driver of a vehicle egressing White House Farm has good visibility to westbound traffic and is unlikely to undertake a manoeuvre that would cause a conflict.

Summary of Submission

understand the dance. There are no get out points in the scheme as drawn. In scenarios of traffic conflict how is it eased?

This drawing shows the yield point at the eastern end of the village, this is past the Norwich Road, the view to exit that road onto the main traffic route is again difficult, has consideration been taken as to how traffic enters and exits here, their situation is somewhat similar to that of exiting my drive and will be coming between two yield points.

I initially stated that the proposed HIS raised the level of risk for us entering and exiting our property. I appreciate the drawings, time and information given however these offer no reassurance. I am ever more concerned about the scheme. On your notes you state “ the highway realignment in the vicinity of Chapel Street and the defined parking bays provide better pathways for vehicles affording adequate forward visibility and potential to react to highway hazards”

The realignment offers visibility for the yielded vehicles to see one another but does not take into consideration vehicles from my driveway, Chapel Street and Norwich Road, the visibility for all of us will be questionable adequate and we in fact become those highway hazards. I request all involved look at the scheme with a view of not just getting the HGVs through but the risks and impacts on other drivers/ vehicles attempting to join this traffic “flow”.

As I have previously said, I do not know how you mitigate this scheme to make it safe but I question that it can be accepted as such and believe all concerned, Boreas, NCC and Highways look at the drawing detail but make time to come and view the problems in 3D reality.

Applicant’s Comments

Technical Note Entrance and Egress onto the B1145, [REP14- 044, Drawing TP-PB5640-DR065] demonstrates that for an eastbound HGV yielded at the triangle, the driver has adequate visibility to a vehicle egressing White House Farm Access and is therefore unlikely to proceed while a vehicle is encroaching onto the carriageway, and will momentarily pause until the manoeuvre is complete and unimpeded visibility is restored.

OTMP Appendix 6 [REP14-024] illustrates that an eastbound yielding HGV has a total forward visibility of 90m up High Street/ Aylsham Road, which is more than adequate to yield at an appropriate point.

Drawing DR067

Whilst some eastbound vehicles may travel down the centre of the carriageway (when parking conditions permit) it can be observed on site that numerous eastbound large vehicles will ‘sweep’ the channel with nearside wheels encroaching into the Chapel Street triangle parking area to create more space to pass on-coming vehicles and to improve forward visibility. This is evidenced on site from the faded edge line and give-way markings. It is re-iterated that the revised HIS geometry improves High Street safe stopping distance, which is the critical metric, recognising that egress from White House Farm requires encroachment onto the carriageway in both baseline and HIS situations.

The baseline parking arrangements are based on the current traffic regulation orders, site observations and are validated by the parking surveys carried out by CPC, Technical Note Revised HIS [REP 4-016, Appendix B].

Drawing DR017

The drawings have been informed by topographical surveys, critical measurements and numerous site visits and observations and are considered an accurate reproduction of baseline and HIS environments.

The design teams work has been subject to an independent check in the form of a road safety audit (RSA). An RSA is a mandatory review of scheme intervention by qualified road safety professionals independent to the design team.

Summary of Submission	Applicant's Comments
	<p>The RSA process is to identify aspects of engineering interventions that could give rise to road safety problems and to suggest modifications that could improve road safety for all users. The process requires the audit team to visit the site to interpret CAD drawings in the 'real world' situation.</p> <p>Technical Note Revised HIS [REP 4-016, Appendix A] contains the drawings that were submitted to the RSA team and confirms 'PB5640-DR017/F1.0 Cawston Highway Intervention Scheme – HGV Forward Visibility and Chapel Street Junction Visibility' was part of the suite of documents. The RSA report was received by the Applicant's design team and the recommendations reviewed and all accepted (no issues were raised with regard to the Chapel Street details). 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] and OTMP Appendix 6 [REP 14-024] contains the finalised HIS drawings (complete with the RSA recommended amendments).</p> <p>The RSA report and decision log [REP5-055] were reviewed by NCC's Development Control Panel, as the Overseeing Organisation and it was confirmed that there were no further technical objections to the scheme.</p> <p>It is therefore concluded that all road safety matters (including those relating to Chapel Street and Norwich Road) have been given consideration in the HIS design evolution, have been subject to third party safety review and have been formally approved in accordance with UK mandatory guidance.</p> <p>The driver compliance measures are detailed in the OTMP [REP14-022] and are supported by continuous monitoring of the behaviour of <u>all</u> highway users to ascertain if further intervention measures to the HIS are required. Potential further intervention measures are:</p> <ul style="list-style-type: none"> - Applying the OTMP 'breach' corrective process for contractor vehicles; - Further hazard signing; - Introduce mandatory priority 'give-way'; - Increased parking enforcement; and

Summary of Submission	Applicant's Comments
	<ul style="list-style-type: none"> - Incrementally reducing the volume of construction traffic passing through Cawston from 239 HGV movements through targeted intervention informed by monitoring and consultation with the Highway Authority.

1.10 REP14-079 Diana Lockwood

Summary of Submission	Applicant's Comments
<p>Requests 3D images showing the true size and scale of the construction in situ and raises concerns over proposed mitigation planting at the onshore project substation, with reference to growth rates.</p>	<p>The ES contains visualisations [APP-509 to APP-532] which are representative of the size and scale of the proposed development and include Norfolk Boreas alone (Scenario 2) and Norfolk Boreas with Norfolk Vanguard (Scenario 1). Furthermore, additional isometric visualisations of the onshore project substation have been included in the Preliminary Design Report submitted at Deadline 14 [REP14-045].</p> <p>Please refer to the Applicant's response to Open Floor Hearing 2 [REP13-014] Item 7 where it responded to concerns over the visual impacts of the onshore infrastructure and references all the previous submissions made on this matter.</p> <p>Please also refer to the Applicant's response to the ExA's fifth written questions [REP14-036] Q5.9.5.7 on proposed planting materials which confirms that the OLEMS [REP14-022] has been updated to contain a further commitment on the size of plants to be used in the mitigation planting scheme.</p>
<p>Considers that Norfolk Vanguard and Norfolk Boreas have been looked at and planned in isolation and not jointly.</p>	<p>Please refer to the Applicant's comments on responses to the ExA's fifth written questions [REP15-003] Q5.4.0.1 cumulative impact assessment, which states that;</p> <p><i>Vattenfall Wind Power Ltd has adopted a strategic approach to the planning of the transmission infrastructure for Norfolk Vanguard and Norfolk Boreas with the aim of optimising overall design and reducing impacts where practical.</i></p> <p><i>A full Cumulative Impacts Assessment (CIA) has been undertaken as part of the Environmental Impact Assessment as detailed in ES Chapter 33 Onshore Cumulative Impacts [APP-246]. This includes potential cumulative impacts with Norfolk Vanguard, which would occur under Scenario 1 and considers the co-location of the permanent onshore infrastructure.</i></p>

Summary of Submission	Applicant's Comments
Concerns of the noise monitoring at the onshore project substation.	<p>Please refer to the Applicant's response to Open Floor Hearing 3 [REP13-015] Item 15 where it responded to concerns over operational noise and noise monitoring and references all the previous submissions made on this matter.</p> <p>Please also refer to the Applicant's comments on responses to the ExA's fifth written questions [REP15-003] Q5.9.5.3, where the Applicant confirms that as secured by DCO Requirement 27(3) the Applicant must undertake a scheme of noise compliance monitoring following completion of the onshore project substation to demonstrate that the noise levels have been achieved after initial commencement of operations and six months after reaching full operational capacity.</p>
Request that any independent early design review should take account of submission from local interested parties and a local forum in conjunction would be beneficial.	Please refer to the Applicant's comments on responses to the ExA's fifth written questions [REP15-003] Q5.9.5.5 on the independent design review panel. In summary, the Applicant considers that any design review would be best conducted in a local forum involving the district council and local stakeholders and feels that the most valuable feedback on the proposed landscape mitigation and appearance of the onshore project substation such as planting species or colour, would be from local stakeholders.

1.11 REP14-080, Jerome Mayhew MP

Summary of Submission	Applicant's Comments
Jerome Mayhew, MP writes of his concern over the potential cumulative impacts of Norfolk Boreas, Norfolk Vanguard and Hornsea Project Three across his Broadland constituency and particularly draws attention to the potential difficulties of managing traffic and protecting residents' amenity in Cawston.	Please refer to the Applicant's response to Open Floor Hearing 3 [REP13-015] where the Applicant has responded on concerns raised regarding potential cumulative impacts. In summary, the Applicant's Environmental Impact Assessment (EIA) includes an assessment of cumulative impacts with Norfolk Vanguard and Hornsea Project Three, along with other appropriate projects. ES Chapter 33 Onshore Cumulative Impacts [APP-246] outlines the projects included in the technical assessment and provides details of the assessment methodology. The details of the assessment of cumulative impacts are included in each relevant technical chapter. This includes a detailed cumulative traffic assessment with Hornsea Project Three (section 24.8 of ES Chapter 24 Traffic and Transport, APP-

Summary of Submission	Applicant's Comments
	<p>237) and associated cumulative noise, vibration and air quality effects associated with road traffic (see section 25.9 of ES Chapter 25 (APP-238) and section 26.8 of ES Chapter 26 (APP-239)).</p> <p>Furthermore, additional assessments have been undertaken at both Oulton [REP10-36 Appendix 1] and Cawston [REP8-028] with respect to noise, vibration and air quality associated with additional traffic movements, which have not identified any potential significant impacts.</p> <p>With regards to the proposed Highways Intervention Scheme (HIS) at Cawston, the scheme has been subject to and passed an independent Road Safety Audit [REP5-055], which considered traffic for the project and cumulatively across all three projects. Norfolk County Council Highway Authority is in agreement that the scheme is sufficient to mitigate the traffic impacts arising from the Project alone and cumulatively with other projects [REP11-016].</p> <p>Broadland District Council accept the findings of the additional assessments undertaken for air quality and vibration (see final SoCG [REP10-36]), however did have residual concerns regarding noise. Subsequently the Applicant has made a commit in the updated OCoCP [REP14-012] to a scheme of noise monitoring which will form part of the Construction Noise Management Plan (CNMP) developed as part of the final CoCP in consultation with Broadland District Council, which will be submitted to and approved by them prior to construction under Requirement 20.</p> <p>The Applicant has sought to engage positively with Cawston Parish Council, (CPC) and has had numerous conversations throughout the examination process with representatives of Cawston Parish Council . The Applicant is committed to continuing that engagement both with Cawston Parish Council and the wider community in order to ensure any amenity concerns and potential solutions are considered by the Project throughout its development and construction.</p>

1.12 REP14-081, Greg Peck MP

Summary of Submission	Applicant's Comments
<p>Councillor Greg Peck states that the Project's TMP does not demonstrate "a sufficiently effective traffic management plan in and around the villages of Cawston and Oulton" and cites concerns regarding "11 years residents will have to suffer a deterioration in their air quality, excess noise and vibration, damage to public health and the heritage of the village" of Cawston.</p>	<p>Please refer to the Applicant's comments on REP14-080 above regarding the traffic impacts at Oulton and Cawston and the proposed HIS.</p> <p>The Applicant has responded to specific concerns raised regarding the proposed HIS throughout the examination process, please refer to the Applicant's response to the ExA's fifth written questions Q5.14.1.1 [REP14-036] and the Applicant's comments on Deadline 13 submissions [REP14-039], section 1.1.</p> <p>In response to the ExA fifth written questions [REP14-036] Q5.4.0.3 the Applicant has provided a worst case activity periods for Broadland District communities which identified the worst case total elapsed time of construction activities across all three windfarm project would be approximately 6 years, rather than the 12 years referred to and work during this time would not be continuous.</p> <p>Please refer to the Applicant's response to Open Floor Hearing 3 Item 8, where the Applicant has provided clarification on the siting of the construction compounds and associated impact on traffic.</p>

1.13 REP14-082 Alice Spain

Summary of Submission	Applicant's Comments
<p>Written summary of oral contributions at Open Floor Hearing 3 (OFH3) on the issue of possible Boreas site contamination.</p>	<p>Please refer to the Applicant's response to Open Floor Hearing 3 (OFH3) [REP13-015] in relation to potential plane crash contamination (Item 16) and also the Applicant's response to the ExA's fifth written questions [REP14-036] Q5.16.2.1 where the Applicant confirmed that paragraph 102 of the OCoCP [REP14-012] had been updated to state that a radiological investigation will be undertaken in the area of the crash as part of the proposed ground investigation and further assessment of potential contamination sources. However, the Applicant wishes to clarify that this is a precautionary measure and that at this stage there is no evidence that radiological contamination is present.</p>