



THE PLANNING ACT 2008
THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE)
RULES 2010

NORFOLK VANGUARD OFFSHORE WIND FARM

Planning Inspectorate Reference: EN010079

**Natural England's Response to Written Representations and Other
Supporting Documents submitted by other parties**

30 January 2019

Norfolk Vanguard Offshore Wind Farm – Response to Written Representations and Other Supporting Documents.

Following submission of Natural England's and other consultees Written Representations and other supporting documents regarding the construction and operation of Norfolk Vanguard Offshore Wind Farm, Natural England has reviewed these documents, including statutory and non-statutory consultees, and commented on the major issues within the remit of Natural England. Relevant comments from other consultees are summarised in Table 1, together with Natural England's position on the comments. These comments are colour coded as:

Green Comments – Natural England have no further comments, comments support/agree with Natural England position or does not impact on Natural England concerns

Amber Comments – Natural England comments may be in contradiction, further advice needed, or potential new issue not included in Natural England comments

Red Comments – Comments in direct contradiction/argument with Natural England position or represents a significant issue not mentioned in Natural England's comments

Grey Comments – Comments that are not relevant to Natural England

Table 1: Summary of main comments from other consultees and Natural England's position.

Comment Number/ Page	Summary of Major Comments	Do they contradict or support NE comments, or is this a new issue NE needs to consider
Marine Management Organisation Comments on Change Report and Errata Document		
1.1	Confirmation MMO agrees with changes in the Errata in relation to offshore aspects.	Matches Natural England position.
1.2 & Section 2.	Confirmation MMO broadly agrees with conclusion in change report for benthic ecology	Matches Natural England position.
1.2 & Section 3.	Confirmation MMO broadly agrees with conclusion in change report for shellfisheries	Matches Natural England position.
1.2 & Section 7.	Confirmation MMO broadly agrees with conclusion in change report for marine water and sediment quality.	Matches Natural England position.
1.3 & Section 6.	Marine Geology, Oceanography & Coastal Processes - the findings in the ES and the Change Report are reasonable, accepting that the impact assessment has been made by expert judgment rather than directly applying site-specific data.	Similar to Natural England position.
1.4 & Section 4 and 5.	Underwater Noise and Fisheries - Request for further information relating to 24-hour exposure, as the ES states that the expected offshore working hours during construction are anticipated to be 24/7; however, it appears that the maximum number of piles anticipated to be installed in any 24-hour period was not stated.	Not a point that Natural England have raised but one we would support.
1.5	Identification of detailed design parameters which should be updated on the dDCO to accurately reflect the changes outlined in the Change report:	Not a point that Natural England have raised but one we would support.

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Environment Agency		
Summary	Substantial progress has been made on most of issues – most issues recorded as agreed or under discussion in SoCG. Issue of storing spoil in floodplain still a concern.	Natural England note the substantial progress made between the EA and the applicant. Floodplain issue are not necessarily within NE's remit, however we would support the EA's position particularly avoiding an ecological degradation of the river.
1.01 – 1.03 – Storage of spoil in the floodplain.	Applicant has proposed that spoil can be stored in the floodplain in separate piles to enable floodwater to pass through the floodplain. This issue is a matter of concern to the Environment Agency because of its potential effects in relation to flood risk and ecology of waterbodies.	As above, floodplain issues are not necessarily within NE's remit however we would support the EA's position particularly in avoiding an ecological degradation of the river from the spoil.
1.2 Flood Risk	Not EA's practice to permit activity in the floodplain of a river as it could reduce the capacity to store flood water. Reduction in capacity of floodplain could cause flood water to extend further or increase flood depth.	Not relevant to Natural England.
1.3 Water Quality and Ecology	Storage in floodplain unacceptable in these terms – in periods of heavy rainfall sediment or soil could be mobilised. This could affect the chalk river beds and cover this important feature. Nutrients within the soils could cause enrichment.	This point has not been raised by Natural England, however we would not want any deterioration of the chalk river bed feature or enrichment of the water, therefore support the EA's position.
1.4 Overcoming the Environment Agency's concerns	Any proposal to store spoil in the floodplain would need to be assessed for each individual location. We will require an assessment to be undertaken for each site where it is proposed to store spoil in a floodplain to determine the impact of spoil piles on flood storage and flood flow; without this we will not permit. In addition it will be necessary for the landscape and ecological management plan to include procedures to monitor and mitigate for effects during heavy rainfall events when runoff or mobilisation is likely to occur.	This point has not been raised specifically by Natural England, however we support the EA's position to avoid impacts from flooding and the potential deterioration of the river's habitat and ecology.

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The Wildlife Trusts (Appendix A of Written Representations)		
1.1.1 – 1.1.4. Proposed SNCB Advice on Underwater Noise Management	Do not agree with the proposed SNCB advice on underwater noise management. The approach is based upon the carrying capacity of the Southern North Sea SCI. We have no understanding as to what the carrying capacity of harbour porpoise is in the Southern North Sea SCI. Therefore, there is weak scientific information underpinning the proposed area based approach to management. The lack of progress on underwater noise management not only puts the conservation status of the Southern North Sea SCI at risk, but also future offshore wind farm development, especially due to the in-combination effects of underwater noise. TWT are currently advocating the underwater management approach used in Germany.	Natural England note this position by TWT. The in-combination effects from other windfarms and activities is also a concern to Natural England.
1.2.1. – 1.2.6. Assessment Results	Cannot agree with the in-combination assessment conclusions of no adverse effect on the Southern North Sea SCI.	This is in line with Natural England's position.
1.2.2.	In its current form the SIP lacks detail and therefore TWT does not consider it adequate to ensure no adverse effect on the SNS SCI beyond reasonable scientific doubt.	In line with Natural England's position. We also require further information on how the SIP process will work. Within our written representations we have listed certain things which we would expect to be included within any SIP.
1.2.3.	More detail should be provided on the effectiveness of the proposed mitigation as outlined in the SIP. Noise modelling should also be undertaken to demonstrate the degree of noise reduction which could be achieved through mitigation.	In Natural England's list of what we would expect to be included in any SIP we have highlighted further modelling may be required once the RoC has been updated.
1.2.6.	Highlight that fishing has not been included in the in-combination assessment.	Not highlighted by Natural England, but we take note of this point.
2.1. -2.2. Marine Mammal Monitoring	Strategic approach to monitoring required – pre, during and post con monitoring required. Believe this should be delivered through underwater noise levy. Do not believe just monitoring first four piles is sufficient.	Partly in line with Natural England's position. We agree during construction monitoring will be required.
2.3.2 TWT proposal on an underwater noise levy.	TWT proposes that developers should be conditioned to pay into an underwater noise levy which would fund strategic monitoring and mitigation along with the establishment of a group to coordinate underwater noise management.	Natural England note this idea.

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3.1. Inclusion of fishing in in-combination assessments	Fishing should be included in all in-combination assessment. Fishing is a licensable ongoing activity that has the potential to have an adverse impact on the marine environment.	Not highlighted by Natural England, but we take note of this point.
3.3	Precedent was set for the inclusion of fishing in in-combination assessments when TWT began Judicial Review proceedings against the Department for Energy and Climate Change (DECC) in August 2015 against the approval of Dogger Bank Offshore Wind Farm Order due to the exclusion of fishing from the in-combination assessment as part of the HRA. TWT withdrew the claim due to assurances given by the government regarding the management of fishing within Dogger Bank SAC. One of those assurances was that steps would be put in place to ensure that this scenario would not happen again and that Defra and DECC would work together to ensure fishing would be included in future offshore wind farm impact assessments.	Not highlighted by Natural England, but we take note of this point.
4.2. Post- Consent engagement with the applicant	Wish to formally engage with the applicant on the SIP process.	Natural England also wish to engage with the applicant on the SIP process.
4.3. – 4.5.	Wish to work closely on the project post consent.	Natural England note this comment.
Appendix B	This document sets out: (i) KWT views on the the UK Interagency Marine Mammal Working Group's (IAMMWG) proposed area-based threshold approach to management of underwater noise in harbour porpoise candidate Special Areas of Conservation (cSACs) in the UK; (ii) an alternative underwater noise management model based on noise limits, which has been successfully implemented in a number of other European countries; and (iii) the need for a new UK policy on noise reduction at sea, based on an overall limit on noise throughout the UK, in order to protect this wide-ranging, highly mobile species.	Natural England note the positions held by IAMMWG.
Appendix C - An approach to implementing strategic monitoring and mitigation for the Southern North Sea	Discussion around TWT approach, the levy they propose and how it could be implemented.	Natural England note this idea proposed by TWT.
Whale and Dolphin Conservation Trust		
Paragraph 4	Primary concern is the intense noise pollution resulting from pile driving for all cetacean species and impact upon the SCI. Reliance on embedded mitigation and they will ensure no AEol.	Natural England has concerns regarding effects of noise from construction activities and the impact upon the SCI, particularly in –combination issues.

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Paragraph 5	Do not agree with approach of taking into account the embedded mitigation when assessing the potential magnitude of each effect. WDC do not agree with this approach as these embedded mitigation measures are unproven, and this approach will lead to inaccurate and misleading results.	Natural England note this position.
Location of NVG	Concern is that windfarm construction will impact the SCI both alone and in combination – with potential to impact the site all year round.	Natural England have also raised concerns regarding the SCI in-combination with other plans or projects.
EPS	Pile driving constructed – EPS licence will be required.	Natural England are in agreement with this point.
Baseline Survey Methodologies	Concern regarding the suitability of the data used to inform the baseline outside of the 4 km buffer especially as harbour porpoise could be impacted at much higher distances during construction. Questions around the baseline aerial surveys from 2011 as they are considered old.	Natural England note this position, however we have not raised the suitability of the baseline outside of the 4 km buffer.
Potential Impacts	Concerned to see that foundations requiring piling are being considered – needs to be a move away from foundations requiring piling. Raise concerns and list the effects caused by intense underwater noise and their effects upon cetaceans. They also touch upon prey availability and the uncertainty around any changes.	Natural England note this position.
CIA	Recommend increased vessel activity is included in the CIA. Concerned it doesn't include pile driving at two locations either. Do not agree with overall conclusion that CIA impacts will be of a minor significance.	Natural England also have concerns regarding in combination issues. We note the point regarding increased vessel traffic, however we have not raised this currently.
Mitigation methods	Concerns regarding the JNCC's guidelines – outdated, arbitrary and have a lack of supportive evidence. Concerns over the use of ADDs and the addition of another source of noise. Point to bubble curtains as being proven to reduce effects.	Natural note this position regarding the JNCC's guideline. Bubble curtains are increasingly been used during the detonation of UXOs.
MMMP	Pleased to see the inclusion of MMMP – but inaccurate to conclude that the MMMP will ensure that impacts are adequately mitigated against.	Natural England note this point and expect a MMMP to be produced.
SIP	Large degree of uncertainty if the use of a SIP can conclude no AEoI. Concern that the SIP does not contain a commitment to proven mitigation methods or an assessment of the effectiveness of proposed mitigation methods.	Natural England also have uncertainties with regards to the SIP. We have included in our written representations a list outlining what we would expect to find in a SIP.

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HRA	The wind farm construction will impact the SNS SCI both alone and in-combination. Cannot agree with the conclusion of the HRA that there will be no LSE / adverse effect from in-combination. Concerns around the in-combination assessment in particular – potential for large areas of the SNS SCI to be disturbed by piling activities.	This is in line with Natural England's position.
RSPB		
Summary of Concerns	<p>Our concerns focus on the following aspects:</p> <ul style="list-style-type: none"> • The impact of collision mortality on the kittiwake population of the Flamborough and Filey Coast SPA alone and in-combination with other plans and projects; • The impact of collision mortality on the gannet population of the Flamborough and Filey Coast SPA alone and in-combination with other plans and projects; • The impact of collision mortality on the lesser black-backed gull population of the Alde-Ore Estuary SPA alone and in-combination with other projects. • Cumulative collision mortality to North Sea populations of kittiwake and great black-backed gull; • Cumulative operational displacement to North Sea populations of red-throated diver, guillemot and razorbill. 	<p>The RSPBs summary of concerns are in line and support Natural England's positions. Key NE issues are:</p> <ol style="list-style-type: none"> 1) Cumulative and in combination assessments issues in particular for displacement and CRM on the relevant SPAs. 2) Seasonal apportionment of impacts for HRA in non-breeding seasons to the relevant SPA colonies and in the breeding season for LBBG at the Alde-Ore Estuary SPA and kittiwake at the Flamborough and Filey Coast (FFC) SPA. 3) Seasonal definitions for lesser black-backed gull (LBBG) and gannet. 4) Assessment of displacement impacts regarding consideration of uncertainty and variability

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		<p>and red-throated diver assessments.</p> <p>5) Population modelling approaches (Environmental Impact Assessment, EIA and Habitats Regulations Assessment, HRA).</p>
Key Methodological Concerns	<ul style="list-style-type: none"> • Use of Potential Biological Removal in assessment of impacts on SPA populations; • Use of an unverified stochastic Collision Risk Model (CRM) which underestimates collision mortality; • Use of median bird densities within the deterministic CRM; • Use of revised Nocturnal Activity Rates; • Use of migration-free breeding season; • Approach to apportioning of mortality to SPAs for kittiwake and lesser black-backed gull; • Breeding season gannet avoidance rate of 98.9%; • Inclusion of unjustified criticisms of kittiwake tracking data; • Proposal for mitigation of impacts on the Alde-Ore Estuary SPA. 	Some of these methodological issues have been raised by Natural England also along with our key issues above.
National Trust		
Principal Concerns	<p>The trust does not object to the proposal but has three principal concerns:</p> <ul style="list-style-type: none"> - Impacts of proposal on the archaeology of Blickling Estate 	Not relevant to Natural England.

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	<ul style="list-style-type: none"> - the impact of disturbance to the highway network and the consequent effect on the Trust's visitor based business during the construction period; - the possibility of compulsory acquisition of the Trust's interests in its inalienable land. 	
NFFO		
Summary of Concerns 1.	The worst case scenario has not been adequately defined in order to properly inform the assessment – it does not define, for a given water depth, how far anchor lines will extend beyond the floating platforms.	Natural England notes this position.
Summary of Concerns 2.	There is insufficient evidence that the risk to fishing vessels under the worst case scenario has been appropriately assessed.	Not relevant to Natural England.
Summary of Concerns 3.	Sensitivity criteria lacks specificity. Do not agree that the significance of the impact should be classified as minor with respect of loss of grounds and displacement during O&M.	Not relevant to Natural England.
Summary of Concerns 4.	The Cumulative Effects Assessment lacks transparent data analysis to support its conclusions.	Natural England notes this position.
Summary of Concerns 5.	Relative to fixed foundation options, floating platform options present a less safe operating environment (especially under the worst case scenario) and physically hinder coexistence with commercial fisheries activities.	From Natural England's perspective floating platforms are a better option than fixed platforms using monopiles as there will be less interaction with the seabed.
Summary of Concerns 5.	For safety reasons, an obligation to report exposed cables should be secured via the Deemed Marine Licence. We suggest a condition under notifications requirements is most appropriate.	Natural England notes this position.
Historic England		
Summary I	Need to ensure that specified mitigation measures are in place to ensure that any subsequent survey programmes are adequately informed by archaeological objectives.	Not relevant to Natural England.
Summary II	Note the position of the onshore transition pit and associated onshore landfall works are positioned back from the eroding cliffs such that intrusion onto the foreshore area and the risk of encountering archaeological materials is correspondingly reduced.	Not relevant to Natural England.
Summary III	A crucial matter is that measures within the draft Development Consent Order provide for appropriate methodologies to be employed so that further investigations within the proposed project area, prior to the commencement of construction activities, deliver effective mitigation.	Natural England notes this position.
Network Rail		
1.4	Network Rail does not agree to compulsory powers being granted or executed in relation to its operational railway land but is willing to enter into agreements with the applicant and	Not relevant to Natural England.

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	protective provisions for the benefit of Network Rail to enable the Proposed Development to be carried out.	
3.1	Network Rail does not object in principle to the Proposed Development. However it strongly objects to the compulsory acquisition of rights over operational land and the inadequate protective provisions in the DCO.	Natural England notes this position.
3.4	Network Rail is considering the possible impact of EMI that may be emitted by the operation of the Proposed Development and will update the ExA at the next appropriate deadline.	Not relevant to Natural England.
Anglian Water		
1.5	Anglian Water is in principle supportive of the development.	Natural England notes this position.
2.4	A formal application will need to be made to Anglian Water for a diversion to be considered. Diversionary works will be at the expense of the applicant.	Not relevant to Natural England.
2.6	We would expect mitigation measures to be put in place to prevent any pollution of the chalk aquifers from surface activities.	Natural England would support this position to avoid any pollution to any water bodies.
Government of France		
1.1 Environmental Stakes: Birds	HRA should take into account the SPAs "Banc des Flandres" and "Caps Gris-Nez." They may potentially be submitted to a collision risk and displacement related to a barrier effect of the wind farm.	Natural England notes this position by the French Government. In Natural England's considered opinion, it is not within our remit to comment upon HRA issues and assessments when the relevant designated sites are in France. These should be addressed by the relevant nature conservation body in the country of concern.
1.2 Main Issues of Natura 2000 sites	<p>The main issues at these Natura 2000 sites are breeding species, such as:</p> <ul style="list-style-type: none"> - Common and little terns, lesser black-backed, great black-backed, common, and Mediterranean gulls, which nest on the SPA "Banc des Flandres" or use the site during the breeding season. - Black-legged kittiwake, northern fulmar and herring gull on SPA "Caps Gris Nez" 	Natural England notes this position by the French Government. In Natural England's considered opinion, it is not within our remit to comment upon HRA issues and assessments when the relevant designated sites are in France. These should be addressed by the relevant nature conservation body in the country of concern.

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1.3 Offshore Ornithology ES	The assessment of impacts related to the barrier effect is insufficient.	Natural England notes this position by the French Government. In Natural England's considered opinion, it is not within our remit to comment upon HRA issues and assessments when the relevant designated sites are in France. These should be addressed by the relevant nature conservation body in the country of concern.
1.4 Assessment of Cumulative Impacts	Importance of conducting a study on cumulative effects taking into account the French Wind farms. Relevant to carry out an analysis of different migratory routes of the ecological stakes for which natura 2000 sites have been designated.	Natural England notes this position by the French Government. In Natural England's considered opinion, it is not within our remit to comment upon HRA issues and assessments when the relevant designated sites are in France. These should be addressed by the relevant nature conservation body in the country of concern.
3. General Recommendations	It is necessary to consider the Banc des Flandres and Capr Gris Nez SPAs. Results of the impact assessment for the Norfolk project and the cumulative impacts with 37 other wind projects in N Sea are not very reassuring. Essential to implement reduction measures to limit residual impacts regarding collision risk on northern gannets, black-legged kittiwakes, lesser black-backed and great black backed gulls, arctic and great skuas. It is also important to ensure that a program is going to be implemented to: Monitor species frequentation, Assess behaviours and trajectories within the wind farm, Evaluate precisely the risk of collision by camera and radar, the only technique currently relevant to comprehensively assess it.	Natural England notes this position by the French Government. In Natural England's considered opinion, it is not within our remit to comment upon HRA issues and assessments when the relevant designated sites are in France. These should be addressed by the relevant nature conservation body in the country of concern.
National Grid		
1.1.	Does not object in principle to the development.	Natural England notes this position.
1.2.	Objects to the authorised works, which include connection to their Electricity Transmission Network – need suitable protective provisions in place.	Not relevant to Natural England.

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2.3.	Object to works around a high pressure gas main which is classified as a Major Accident Hazard Pipeline. Lists the standard protocols and guidelines for such pipelines in section 4.3.	Not relevant to Natural England.
6.1.	National Grid seeks to protect its statutory undertaking, and lists procedures that should be complied with by the applicant.	Not relevant to Natural England.
Norfolk Vanguard Ltd.		
Whole document	Provides an overview to the relevant legislation and policy required to be taken into account by the ExA. It also concludes how the applicant has abided to this legislation.	Natural England have no further comments on this document.
Shell (UK) Ltd.		
Overview	Before any work starts on site, the developer must consult with the British Pipelines Agency (BPA). Lists a number of procedures the applicants should follow.	Not relevant to Natural England.
Cadent Gas Ltd.		
1.1.	Does not object in principle to the development proposed by the applicant.	Natural England note this position.
1.2.	Objects to the authorised works being carried out in close proximity to their apparatus.	Not relevant to Natural England.
2.0 Onwards	Provides information around protecting their assets and insurance issues around this.	Not relevant to Natural England.
No to Relay Stations (N2RS)		
Transmission System	Commitment by Vattenfall to HVDC Transmission warmly welcomed. No reason to doubt the applicant's intentions, but ask for reassurances that if and when consent is given, it does not allow for turning back to HVAC.	Natural England support the commitment of HVDC transmission, and would welcome any further reassurance Vattenfall may provide.
Choice of Landfall	Pleased to see reassurances that HDD will be employed. However, erosion on this fragile coast has far exceeded that predicted by the Shoreline Management Plan. MCZ appeared to provide constraints which did not allow the applicant to consider other options. State they seem it is wrong that the MCZ which was designated in 2016 should take precedent over the village.	Natural England also support the commitment to utilise HDD to avoid impacts to the coast in this area. The stakeholder's position regarding the MCZ is not in line with Natural England's.
Crown Estate and National Grid	Complete lack of joined up thinking between TCE and NG to avoid disruption to this area of the country particularly as Hornsea 3 and NVG will cross each other in the centre of the county.	Natural England have some concerns regarding some of the cable route, particularly in regard to the 82 metres of hedgerow that is planned to be removed.

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Necton Substation Action group		
Overall Conclusions	Concerns around the site selection of the substation and the balance of environmental issues with other sites not being considered properly. Noise issues associated with the substation. Concerns around the F16 crash site and contamination.	Natural England have no further comments regarding the location of the substation. Contamination issues regarding the F16 crash site are outside of Natural England's remit.
Campaign to Protect Rural England		
Overall Conclusions	Welcome addition of a HVDC system how seek reassurances if there problems with the provision of such a system. Quote HP3 hearing and Orsted casting doubt on such a system. Also raise contamination issues regards the F16 crash.	Natural England are supportive of the addition of a HVDC system. Contamination issues regarding the F16 crash site are outside of Natural England's remit.
Oulton Parish Council		
Cumulative Traffic; Vattenfall & Orsted	Concerns from the parish council regarding the HGV and traffic movements on the B1149 which is to be used by NVG and HP3. No cumulative impact assessments has been published.	Not relevant to Natural England.
NVG / Boreas Projects	Concerns regarding cable drum deliveries around LINK 68 / cable route. Number of queries posed to Vattenfall regarding potential traffic problems.	Not relevant to Natural England.
Necton Parish Council		
Whole Document	Refers to ASI rather than written representations, however the supporting information that they have also submitted related to the F16 crash in 1996 upon the land proposed to be developed for the substation.	Not relevant to Natural England.
Broadland District Council – Local Impact Report		
5.2 – 5.4	Comments regarding the cumulative impacts of the cable corridors for Norfolk Vanguard windfarm and the Hornsea Three windfarm	Natural England agrees that in-combination assessment should include Hornsea 3 as the cable route for this offshore wind farm passes within 1km of Booton

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		Common SSSI and construction periods may overlap.
5.5	The installation of the cable route requires the removal of sections of hedgerow; these removals will have to be assessed using the criteria set out in the Hedgerow Regulations 1997.	Matches Natural England position.
5.6 – 5.8	Impacts of construction traffic in Cawston	Not relevant to Natural England.
Norfolk County Council (NCC) – Local Impact Report		
4.2 – 4.4	Broadly supportive of the project as it is consistent with national renewable energy targets and objectives, subject to the detailed comments below being satisfactorily resolved with the applicant.	Matches Natural England position.
4.5 – 4.7	Supportive of use of HVDC as it removes the need for cable relay stations and reduces the footprint of the cable corridor	Matches Natural England position.
4.8 – 4.10	Comments on discussions for electricity to be used within local distribution networks and suggestions that Vattenfall work with National Grid and UK Power Networks in this regard.	Not relevant to Natural England.
4.11 – 4.17	Comments on Socio-Economic Issues, including benefits from use of port facilities at Great Yarmouth.	Not relevant to Natural England.
4.18 – 4.22	Comments on Wider Community Issues and Impact on Business, including commitment from Vattenfall to establish some form of community benefit and the reduction in the potential impacts and disruption to business from use if HVDC.	Not relevant to Natural England.
4.23 – 4.28	Comments on commercial fishing, particularly that NCC welcome the revised/amended design proposal and mitigation measures set out in the applicant's ES. However, where there is likely to be a demonstrable impact (i.e. during: construction; operation and/or decommissioning) on commercial fishing affecting communities in Norfolk, it is considered that Vattenfall should provide appropriate compensation (i.e. disturbance payments) to those fishing businesses affected. It is understood that Vattenfall are prepared to provide compensation in appropriate circumstances.	Not relevant to Natural England.
4.29 – 4.31	Comments on Local Highway issues, primarily the use of the former Oulton Airfield as the main work compound. NCC retain a holding objection on safety grounds because of this.	Not relevant to Natural England.
4.32 – 4.35	Comments on wider strategic highways issues, primarily proposed access at Necton and proposed cable route/	Not relevant to Natural England.
4.36 – 4.38	Comments on minerals and waste concluding that NCC in its capacity as the Minerals and Waste Planning Authority does not object to the proposed project provided that the applicant continues to work with NCC regarding the mitigation of impacts on the Mineral Safeguarding Areas.	Not relevant to Natural England.

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4.39 – 4.44	Comments on flood and drainage, with particular concerns that there is no maintenance or management strategy in the application.	Not relevant to Natural England.
4.45 – 4.49	Comments on Landscape, including use of HVDC which reduces cable corridor. However, NCC note that HVDC does make the substation taller. Note that Breckland District Council are LPA with ultimate responsibility.	Not relevant to Natural England.
4.50	Comments on Public Health	Not relevant to Natural England.
4.51 – 4.52	Comments on discharge of requirements, primarily relating to who may be best placed to sign these off.	Not relevant to Natural England.
5.1	Further comments on: <ul style="list-style-type: none"> Hedgerow – request that maximum possible replanting / mitigation of hedgerows is undertaken after works are carried out in respect of the cable route and any other onshore development resulting in the potential removal of hedgerow. Coastal Erosion - request that sufficient safeguards and mitigation measures are put in place where the offshore cable route makes landfall to the south of Happisburgh (as a planning requirement), in order to ensure the onshore infrastructure does not exacerbate existing coastal erosion in the area. Highways access 	Matches Natural England position.
6.1 – 6.5	General conclusions - The report and supporting appendices, show that while the NCC supports the broad principal of this development proposal, there are a number of issues directly affecting the Authority which need to be resolved as part of the DCO process.	Matches Natural England position.
	Appendix 1 - Detailed Environmental, Highway and Flood Risk Comments	
1.1 – 1.4	Comments on Public Rights of Way	Similar to Natural England position.
1.5	Introduction to onshore ecology elements.	No comments.
1.6 – 1.7	Agree with the content of the Outline Code of Construction Practice (OCoCP) and the Outline Landscape Ecological Management Strategy (OLEMS).	Natural England consider there is insufficient detail in the Code of Construction Practice (CoCP) for measures to safeguard the designated site in relation to sediment control and reinstatement of all work areas. In addition, detailed management and monitoring procedures should be provided in the CoCP in case of 'breakout' (where the drilling fluid

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		leaves the bore and escapes into the surrounding substrate).
1.8	NCC welcome the use of HDD	Similar to Natural England position.
1.9	NCC has previously raised concerns of various topics which have now been addressed: <ul style="list-style-type: none"> The constraints on access for ecological surveys Insufficient survey effort of County Wildlife Sites The suitability of the bat surveys to enable delivery of appropriate assessments of impacts and therefore appropriate mitigation 	Natural England remain concerned that there is likely to be an impact on the Paston Great Barn SAC due to loss and severance of foraging and commuting habitat over at least 7 years. However, we are unable to assess the significance of the impact without further information on habitat to be lost and fragmented as a result of the proposed development.
1.10 - 1.13	Comments on onshore and offshore archaeology	Not relevant to Natural England.
1.14 – 1.16	Comments on flood risk as lead local flood authority (LLFA)	Not relevant to Natural England.
	Appendices 2 - 6	
	Maps of offshore location, proposed landfall, cable route and grid connection at Necton and copy of PEIR comments submitted in November 2017.	Natural England notes this point.
Breckland Council – Local Impact Report (Main comments)		
Page 4 - 5	HVDC technology – Comments that whilst HVDC technology reduces impact on environment and local communities where onshore infrastructure is located it does result in taller grid connection facility at Necton.	Similar to Natural England position.
Page 5.	Community Involvement – Comments that it is the planning judgement of the Local Planning Authority in this case does not have the backing of the affected local community, particularly due to cumulative and visual impacts	Not relevant to Natural England.
Page 5 - 6	Cumulative Landscape and Visual Impacts – Comments that the cumulative landscape and visual effects of the development would create negative disbenefits in planning terms, therefore the Secretary of State for Energy must therefore balance the advantages of this major renewable energy project with these negative effects.	Not relevant to Natural England.
Page 6.	Comments on Economic and Community Benefits	Not relevant to Natural England.
Page 6 – 7	Conclusions - Breckland Council remains supportive of the national and local agenda for using renewable energy technologies and considers it acceptable in principle for this type of development on a commercial scale to be accommodated in the District. However, the landscape of the area is unique and of great importance. The existing substation is	Not relevant to Natural England.

Comment Number/ Page	Summary of Major Comments	Do they contradict or support NE comments, or is this a new issue NE needs to consider
	significant in terms of visibility from the A47 now and the proposed extension and the HDVC convertor station would result in a disproportionate and dominant impact on the landscape. From the point of view of the Local Planning Authority, these are the two key considerations which the Secretary of State for Energy must balance against one another when reaching a decision on the acceptability of the scheme. If the development is judged to be acceptable then the local community must be consulted on what other site specific mitigation measures should be secured and spent locally via a Community Benefit Fund. The Local Planning Authority would reinforce its recommendation for the applicant to run a purposeful and meaningful Local Liaison Group in order to achieve this.	
George Freeman MP – Summary of 4 page document		
	Object to the project primarily due to location of the substation at Necton and impacts on local community, including visual impacts.	Not relevant to Natural England.
	Also concerned with environmental analysis which has been undertaken primarily in relation to air crash site.	Not relevant to Natural England.