

**From:** [Matthew Rooke](#)  
**To:** [Norfolk Vanguard](#)  
**Cc:** [REDACTED]  
**Subject:** Ref: EN010079 - Deadline 1 submission  
**Date:** 16 January 2019 16:00:55  
**Attachments:** [Vanguard Local Impact Report - Jan\\_19.docx](#)  
[Vanguard response to examining\\_auth. questions Jan\\_19.doc](#)

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I attach Broadland District Council's deadline 1 submission including:

- Written responses to Examiner's questions, and
- Local Impact Report

Our Statement of Common Ground has been submitted by the applicant with a note to explain that engagement to move forward from this initial position is ongoing.

Regards

Matthew

**Matthew Rooke**  
**Planning Manager (West)**

t. 01603 430571 e. [matthew.rooke@broadland.gov.uk](mailto:matthew.rooke@broadland.gov.uk)



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# **LOCAL IMPACT REPORT**

## **BROADLAND DISTRICT COUNCIL**

**APPLICATION BY: Norfolk Vanguard Limited for an Order Granting Development Consent for the Norfolk Vanguard Offshore Windfarm Project.**

**PLANNING INSPECTORATE REF: EN010079**

**DISTRICT COUNCIL REF: VANGUARD LIR/001**

**DATE: 16 JANUARY 2019**

## **1.0 INTRODUCTION**

- 1.1 Following the preliminary meeting held in Kings Lynn on 10 December 2018, the Examining Authority wrote to Broadland District Council (BDC) setting out the procedural decisions made in respect of the forthcoming Examination into the application.
- 1.2 This document is the Local Impact Report (LIR) for BDC, in accordance with the advice and requirements set out in the Planning Act 2008 (as amended) as, '*a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area)*'.
- 1.3 In preparing this LIR the local authority has had regard to the DCLG's *Guidance for the examination of applications for development consent (2015)* and the Planning Inspectorate's Advice Note One, *Local Impact Reports (2012)*.
- 1.4 The LIR relates only to the onshore elements and identifies the most relevant policies and the main issues the Council has concerns over.

## **2.0 DETAILS OF THE PROPOSAL**

- 2.1 This project is for an offshore windfarm by Vanguard which would generate 1,800 MW of electricity. The location of the Vanguard offshore array is within the southern North Sea. The grid connection for the generated electricity is at Necton in Breckland District Council. The key component of the project within Broadland is the cable route.
- 2.2 The wind farm consists of up to 257 turbines off the coast of Norfolk and will make landfall at Happisburgh, North Norfolk with a buried cable route between landfall and the grid connection. The route will run through three Local Authorities North Norfolk, Broadland and Breckland.
- 2.3 The cable corridor will be 45m in width, comprising up to 4 trenches within which the cables will be laid. Consent is also sought for the cable ducts required for the future Norfolk Boreas wind farm project. The applicant has confirmed that the transmission system for the onshore proposals will be HVDC.

## **3.0 RELEVANT DEVELOPMENT PROPOSALS**

- 3.1 A separate offshore wind farm project by Orsted known as Orsted Hornsea Three has been submitted to the Planning Inspectorate for an Order Granting

Development Consent under PINS ref: EN010080, this proposes to take landfall at Weybourne in North Norfolk with a connection to the grid at a substation near Swardeston in South Norfolk Council administrative area. The cable route for the Orsted project runs through Broadland District and the proposed Norfolk Vanguard project crosses it at a point north of Reepham within Broadland District. It is noted that the applicant has stated that it has entered into a co-operation agreement with Orsted to minimise the cumulative impacts of construction at the crossing location.

- 3.2 Planning application ref: 20130860 - Biomass Renewable Energy Facility, Associated Landscaping and Vehicular Access, Oulton Airfield, The Street, Oulton. Refused November 2013. Appeal dismissed June 2014.

## **4.0 POLICY FRAMEWORK**

- 4.1 The Development Plan comprises the following documents; the government's National Planning Policy Framework (2018) is a material consideration alongside the suite of planning guidance. The following policies are considered to be relevant to the consideration of this application:

- a) Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS) 2011 (amendments adopted 2014)

Policy 1 – Addressing climate change and protecting environmental assets

Policy 2 – Promoting good design

- b) Broadland Development Management Plan DPD (DM DPD) 2015

Policy GC4 - Design

Policy GC5 - Renewable Energy

Policy EN1 - Biodiversity and Habitats

Policy EN2 - Landscape

Policy EN4 - Pollution

Policy TS2 - Travel Plans & Transport Assessments

Policy TS3 - Highway safety

Policy CSU5 – Surface Water Drainage

- c) Site Allocations DPD 2016

- 4.2 Supplementary Planning Document:

- i) Broadland Landscape Character Assessment SPD 2013

- 4.3 The Greater Norwich Local Plan – The Plan is presently at its Regulation 18 consultation stage, the latest consultation closed on 14 December 2018 and

covers further submitted sites and revisions to some sites already consulted upon and follows an earlier consultation from January to March 2018. Adoption is anticipated in September 2021.

## 5.0 IMPACTS OF THE PROPOSALS

- 5.1 It should be noted that issues of Hydrology and flood risk, Ecology and nature conservation, Archaeology and Traffic and transport are matters that BDC has agreed to defer to Norfolk County Council who have the professional officers to comment in each subject area. Where a common position has been reached and set out in the SoCG to identify the required mitigation of an impact of the proposal, it has not been repeated in this LIR to avoid repetition.
- 5.2 As such BDC has concentrated on the specific outstanding material impacts over which we raise unresolved concerns, namely:
- a) The cumulative impacts of the construction of the Norfolk Vanguard windfarm and the Hornsea Three windfarm.
  - b) 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.
  - c) Impacts of construction traffic in Cawston.

Taking each of these in turn:

**a) The cumulative impacts of the construction of the Norfolk Vanguard windfarm and the Hornsea Three windfarm.**

- 5.3 A separate cable corridor and associated development within BDC is proposed as part of the Hornsea Three off-shore windfarm. The cumulative impacts of the two proposals need to be considered. In this respect it is noted that Hornsea Three are proposing their main construction compound on part of the former airfield to the south west of the village of Oulton, in addition to the two construction compounds that Norfolk Vanguard are proposing in Oulton. Both operators are proposing to use The Street to connect to the B1149, which is a narrow country lane. There are concerns about whether the construction programmes will overlap and therefore cause significant disruption in the village and the surrounding area. Reference is made at para. 3.2 above to a previous planning application (ref: 20130860 and the subsequent appeal decision) for an AD plant on part of the former Oulton Airfield which was refused and dismissed at appeal on grounds that the proposed development would have an unacceptable impact on highway safety

and convenience and be likely to result in material harm to the living conditions of residential occupiers of The Old Railway Gatehouse with reference to noise and disturbance.

5.4 In addition the two cable corridors cross at a point north of Reepham and this has the potential to increase the visual and environmental impacts of the proposal in the locality of this intersection.

**b) 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.**

5.5 An assessment of the Hedgerow Regulations 1997 is required to establish if the removal of sections of hedgerow, necessary to allow the installation of the cable route, would be considered as important due to the flora, fauna or historical significance associated with them. If sections are removed and cannot be replaced following installation of the cables this will have a greater long term significance to the landscape of the locations and some form of mitigation would be appropriate which could include replacement planting on adjacent land.

**c) Impacts of construction traffic in Cawston**

5.6 Since the publication of the PEIR it has become apparent that the proposed route of heavy goods construction traffic serving part of the cable corridor will use the B1145 and pass through the centre of the village of Cawston along Aylsham Road and High Street, which is a two way road that is narrow in places with no parking restrictions along its length and a significant number of vehicles park on the highway, especially along High Street. The western part of Cawston is a Conservation Area and a number of properties along High Street are listed residential and commercial properties which are located in close proximity to the road, some are Grade II\* listed.

5.7 The information provided to date indicates that heavy goods construction traffic driving in both directions into and through Cawston from the east and also return trips into and through Cawston from the west, will significantly increase as a result of this proposal, together with vehicles associated with the separate Orsted Hornsea Three off-shore windfarm proposal. The actual range of the increase, the type of vehicular movements that will be generated and the route of construction traffic on the highway network around Cawston is yet to be determined and will need to be agreed to allow consideration of the issues arising from this. However this level of heavy goods vehicles within Cawston is a serious concern for BDC given the increase in traffic within the Conservation Area and the potential detrimental impact that heavy goods

vehicles could have on the listed buildings along High Street, Cawston and the difficulties for access given the existing on-street parking.

- 5.8 BDC welcomes continued involvement and consultation with the applicant, the Highway Authority and Cawston Parish Council as the number, type, period of activity and route of construction traffic is clarified. Consideration needs to be given to any impacts on heritage assets, highway safety and the residential amenities of occupiers in Cawston including issues of noise, disturbance and vibration arising from the increased heavy goods construction traffic in the village. Until an acceptable alternative has been achieved BDC has serious concerns about the impact of the significant increase in heavy goods construction traffic in Cawston.

## **6 CONCLUSION**

- 6.1 With regards to the Draft Development Consent Order, the District Council does not wish to raise an objection in principle; however as set out in this Local Impact Report, our Statement of Common Ground and in response to the Examining Authority's questions, there are still material issues and concerns relating to specific requirements of the on-shore proposals that the Council considers should be addressed.
- 6.2 The Council at this stage therefore wishes to reserve its final position due to ongoing discussions with the applicant.