

Norfolk Vanguard Offshore Wind Farm

Applicant Response to Broadland District Council Local Impact Report

The background of the cover is a photograph of the Kentish Flats Offshore Wind Farm. It shows several white wind turbines with yellow bases, spaced out across a calm sea under a clear blue sky. The perspective is from a low angle, looking out towards the horizon where more turbines are visible.

Applicant: Norfolk Vanguard Limited
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Photo: Kentish Flats Offshore Wind Farm

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Glossary

CIA	Cumulative Impact Assessment
DCO	Development Consent Order
ES	Environmental Statement
LIR	Local Impact Report
OAMP	Outline Access Management Plan
OLEMS	Outline Landscape and Ecological Management Strategy
OTMP	Outline Traffic Management Plan
SoCG	Statement of Common Ground

1 INTRODUCTION

1. In accordance with the Rule 8 letter of 19 December 2018, Broadland District Council have submitted a Local Impact Report (LIR) at Deadline 1 in relation to the application for a Development Consent Order (DCO) for Norfolk Vanguard Offshore Wind Farm (the Project) as submitted by Norfolk Vanguard Limited (the Applicant). This provides a summary of Broadland District Council's position on various matters including:
 - The cumulative impacts of the construction of the project and the Hornsea Project Three Offshore Windfarm;
 - Hedgerow removal; and
 - Impacts of construction traffic in Cawston.

1.1 Broadland District Council Local Impact Report

1.1.1 Summary Response

2. The Applicant has responded below to matters raised by Broadland District Council. A Statement of Common Ground (SoCG) (Rep1-SOCG-3.1) has been produced between Broadland District Council and Norfolk Vanguard Limited, which provides a summary of matters agreed and those under further discussion. The Applicant will continue to engage with Broadland District Council on points still under discussion in order to reach agreement in due course. Where further progress is made between the Applicant and Broadland District Council, an updated version of the SoCG will be submitted at an appropriate deadline. The final position of the SoCG will be submitted on or before Deadline 8 on 30 May 2019.

1.1.2 Full Response

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<p>1.0 INTRODUCTION</p> <p>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.</p> <p>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, <i>'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)'</i>.</p> <p>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).</p>	<p>Noted.</p>

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<p>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.</p>	
<p>2.0 DETAILS OF THE PROPOSAL</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Noted. The Applicant refers to Environmental Statement (ES) Chapter 5 Project Description (document reference 6.1.5). A range of 9MW to 20MW wind turbines is included in the project design envelope. For 1,800MW there could be up to 200 X 9MW turbines or 90 x 20MW turbines (or any other configuration within this range. There is no allowance in the project design envelope for 257 turbines.</p>
<p>3.0 RELEVANT DEVELOPMENT PROPOSALS</p> <p>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.</p> <p>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.</p>	<p>ES Chapter 33 Onshore Cumulative Impacts (document reference 6.1) provides a summary of the Cumulative Impact Assessment (CIA) for the onshore topics and these are also addressed further within specific chapters (ES Chapter 19 – 31 for onshore). The CIA assesses potential cumulative impacts of the project with Hornsea Project Three and other relevant development proposals. The list of projects in the cumulative assessment was developed in consultation with and agreed with Norfolk County Council and submitted to Broadland District Council for approval prior to submission of the Development Consent Order (DCO) application. There is a Statement of Common Ground submitted for Deadline 1 between Norfolk Vanguard Limited and Orsted (Rep1-SOCG-18.1). Planning application ref: 20130860 - Biomass Renewable Energy Facility was not included in the cumulative assessment given that permission for this application was refused in 2013.</p>
<p>4.0 POLICY FRAMEWORK</p> <p>4.1 The Development Plan comprises the following documents; the government's National Planning Policy Framework (2018) is a material consideration alongside the suite</p>	<p>The Applicant refers to the SoCG between Norfolk Vanguard Limited and Broadland District Council (Rep1-SOCG-3.1) submitted at Deadline 1, where the appropriate plans and policies relevant</p>

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<p>of planning guidance. The following policies are considered to be relevant to the consideration of this application:</p> <p>a) Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS) 2011 (amendments adopted 2014)</p> <p>Policy 1 – Addressing climate change and protecting environmental assets</p> <p>Policy 2 – Promoting good design</p> <p>b) Broadland Development Management Plan DPD (DM DPD) 2015</p> <p>Policy GC4 - Design</p> <p>Policy GC5 - Renewable Energy</p> <p>Policy EN1 - Biodiversity and Habitats</p> <p>Policy EN2 - Landscape</p> <p>Policy EN4 - Pollution</p> <p>Policy TS2 - Travel Plans & Transport Assessments</p> <p>Policy TS3 - Highway safety</p> <p>Policy CSU5 – Surface Water Drainage</p> <p>c) Site Allocations DPD 2016</p> <p>4.2 Supplementary Planning Document:</p> <p>i) Broadland Landscape Character Assessment SPD 2013</p> <p>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.</p>	<p>to landscape and visual, noise and vibration and socio-economics in the onshore project area are identified as having been appropriately considered. ES Chapter 3 Policy and Legislative Context (document reference 6.1.3) provides further detail on this matter.</p>
<p>5.0 IMPACTS OF THE PROPOSALS</p> <p>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.</p> <p>5.2 As such BDC has concentrated on the specific outstanding material impacts over which we raise unresolved concerns, namely:</p> <p>a) The cumulative impacts of the construction of the Norfolk Vanguard windfarm and the Hornsea Three windfarm.</p> <p>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.</p> <p>c) Impacts of construction traffic in Cawston.</p>	<p>Noted, the Applicant has responded below to each of the specific points identified by Broadland District Council.</p> <p>The Applicant refers to the SoCG between Norfolk Vanguard Limited and Norfolk County Council (Rep1-SOCG-15.1) where these matters are discussed further and agreed where appropriate.</p>
<p>a) The cumulative impacts of the construction of the Norfolk Vanguard windfarm and the Hornsea Three windfarm.</p> <p>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</p>	<p>ES Chapter 33 Onshore Cumulative Impacts (document reference 6.1.33) provides a summary of the CIA for the onshore topics and these are also addressed further within specific</p>

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<p>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.</p> <p>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.</p>	<p>chapters (ES Chapter 19 – 31 for onshore). The CIA assesses potential cumulative impacts of the project with Hornsea Project Three and other relevant development proposals. The list of projects in the cumulative assessment was developed in consultation with and agreed with Norfolk County Council and submitted to Broadland District Council for approval prior to submission of the DCO application. The Applicant would refer to ES Chapter 5 Project Description (document reference 6.1.5), in particular map 5 of Figure 5.4. The proposed use of The Street at Oulton is required to access a single mobilisation area (MA7) located further east along Heydon Road. This access route is identified as Link 68 within the application. MA7 is only required to support the construction works in proximity to Oulton only, and is not a main works compound.</p> <p>The Applicant is continuing to work with Orsted to consider cumulative impacts in relation to construction traffic near Oulton. There is a SoCG submitted for Deadline 1 between Norfolk Vanguard Limited and Norfolk County Council (Rep1-SOCG-18.1) where traffic related matters are agreed or subject to further discussion.</p>
<p>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.</p> <p>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.</p>	<p>The Applicant refers to ES Chapter 22 Onshore Ecology (document reference 6.1.22), which assessed the potential impacts on hedgerow removal associated with the construction of the onshore cable corridor. Proposed mitigation measures are provided in the Outline Landscape and Ecological Management Strategy (OLEMS) (document reference 8.7), which is secured by DCO Requirement 24.</p> <p>The OLEMS (document reference 8.7) sets out that all hedgerows will be reinstated along the cable route.</p>
<p>c) Impacts of construction traffic in Cawston</p>	<p>The Applicant refers to the Outline Traffic Management Plan (OTMP)</p>

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<p>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.</p> <p>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.</p> <p>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.</p>	<p>(document reference 8.8) and Outline Access Management Plan (OAMP) (document reference 8.9) submitted with the DCO application. These documents contain a commitment to assessing the manoeuvrability of the types of vehicles that would utilise the B1145 and to mitigate this as appropriate.</p> <p>The Applicant is continuing to work closely with Orsted to consider cumulative impacts with Hornsea Project Three in relation to construction traffic. Should additional mitigation measures be required these will be discussed and agreed with the relevant planning authorities. As outputs from this exercise become available, the Applicant will provide an update through the examination.</p> <p>Any mitigation measures identified for these shared links would be secured through the TMP to be developed with, and approved by, Norfolk County Council as Highways Authority, secured through DCO Requirement 21. The final TMP will set out measures which ensure that cumulative environmental impacts are managed to levels considered acceptable to Norfolk County Council as the local highway authority.</p> <p>Regularly programmed sharing of information will ensure that the final approved TMP accurately reflects the expected construction traffic demand of both projects, and provides certainty to the Local Highway Authority that commitments remain feasible and deliverable.</p>
<p>6 CONCLUSION</p> <p>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.</p> <p>6.2 The Council at this stage therefore wishes to reserve its final position due to ongoing discussions with the applicant.</p>	<p>The Applicant has responded to the points raised by Broadland District Council and will continue to engage through the SoCG (Rep1-SOCG-3.1).</p>