

**Representation in respect of an Application by Orsted Hornsea
Project Three (UK) Ltd for an Order Granting Development Consent
for the Hornsea Project Three Offshore Wind Farm.**

Response by Honingham Thorpe Farm

Planning Inspectorate Reference: EN010080

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For and on behalf of Brown & Co.

Brown & Co is a leading provider of agency, professional and consultancy services across the whole range of rural, commercial, residential, and agricultural markets.

Date: November 2018.

1.0 Introduction

- 1.1 This statement is our response, submitted on behalf of our clients Honingham Thorpe Farms and the associated landowning and trading entities, to the underground cable route proposed as part of the Hornsea Project Three Offshore Wind Farm. Honingham Thorpe Farm is an agriculturally-based business that has significantly diversified to become a centre for a range of farming related businesses, commercial and agri-business development, including the Food Enterprise Park Ltd, a 40 hectare Food Hub allocated under as a Food Enterprise Zone by DEFRA in 2015 and the first 19 hectares of which was given planning approval as a Food Hub and related development under an LDO in 2017.
- 1.2 It is our belief that the proposed route for the underground cable submitted, and the likely protective zone, will frustrate intended development by our clients. The following gives background information on intended proposals for this part of our client's land.

2.0 Background

Food Enterprise Zone

- 2.1 The land forms part of the Greater Norwich Food Enterprise Zone (FEZ), which is one of 17 designated by Department of Food, Environment and Rural Affairs (DEFRA) and the only one in Norfolk. Food Enterprise Zones are a Government Initiative introduced by the DEFRA, the aim is to:
 - a. enhance rural development through the growth of food businesses in a particular location, be it producers, processors, retailers and/or manufacturers;
 - b. encourage greater collaboration between food and farming businesses, and even encourage links to research and education institutions, in order to develop the domestic food and farming sector;
 - c. allow local decision making, particularly for planning a development; and,
 - d. attract inward investment.

Located close to Norwich, the Greater Norwich FEZ is located on the strategic road network at the centre of the largest agricultural county in the UK. The site has excellent road connectivity to London (A11), Midlands (A47, A11/A14) and to the east coast ports at Felixstowe, Great Yarmouth and Kings Lynn. The site is also close to Norwich Research Park, the University of East Anglia, the Norfolk Showground and Easton & Otley College. A plan identifying the area accompanies this statement as Appendix 1.

- 2.2 The Greater Norwich FEZ is supported by the Development Plan, including Policy 5 of the Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk (adopted in March 2011 with amendments adopted in January 2014). Policy 5 refers to the need to encourage opportunities for innovation, skills and training to be expanded through:

‘the development of a flagship food and farming hub serving the needs of Norfolk and supporting the agri-food sector in and around greater Norwich.’

- 2.3 The FEZ designation is also referenced in the Norfolk & Suffolk Economic Strategy as published by the New Anglia LEP. This identifies Easton as a location for the Food Enterprise Zone. A copy of this document accompanies this statement as Appendix 2.
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Food Enterprise Park

- 2.4 In addition to the FEZ, the proposed cable route would affect a 40 hectare area being promoted as the Greater Norwich Food Enterprise Park. The Food Enterprise Park is intended to provide a central cluster of food-related businesses by attracting local, regional, national and international companies. An indicative layout for the Park shows plots being available to buy or lease to accommodate facilities of 500 square metres to 50,000 square metres. The promotion of the land for this purpose is illustrated in promotional material which accompanies this statement as Appendix 3.
- 2.5 The first 19 hectares of the Park is subject to a Local Development Order, which was approved by Broadland District Council on 31st October 2017. The purpose of the LDO is to encourage growth, employment and added value in the Agri-tech, agri-food and food and drink processing sectors. It will also allow development to occur without the need to obtain planning permission for certain types of development. A copy of the designated Local Development Order accompanies this statement as Appendix 4.
- 2.6 The initial first development of the LDO for a Milling Tower building and storage hopper silos together with associated offices has been given planning permission by Broadland District Council in October 2018. Permission was needed, in this instance, as some of the development extended above the height parameters set by the LDO. Construction work will commence shortly on site.

Proposed new settlement

- 2.7 Lastly, the land through which the underground cable is proposed to be routed is being promoted for development as a new settlement through the emerging Greater Norwich Local Plan. The site forms part of a wider proposal for a sustainable settlement known as Honingham Thorpe, which would deliver the following:
- Minimum of 3,900 homes over the next 20 years, with the potential for a further 3,800 over the following 15 years
 - 72 hectares of employment space
 - 81 hectares of country park
 - 3.5 hectares of nature reserve

As can be seen from the attached masterplan, the area where the proposed underground cable is proposed to be routed through our client’s land is currently identified for employment use. The routing of the cable through this section of our client’s proposals would severely compromise our ability to deliver this element of the development.

- 2.8 The draft Local Plan has gone through a ‘Call for Sites’ and is currently having a second Regulation 18 consultation. The remaining programme to produce the Greater Norwich Local Plan is set out below:

Regulation 18 Consultation on New, Revised and Small Sites (current stage)	October-December 2018
Regulation 18 Draft Plan Consultation	September-October 2019
Regulation 19 Publication	February-March 2020
Submission of the GNLP to the Secretary	June 2020

of State for the Environment	
Public Examination	January 2021
Adoption	September 2021

3.0 Conclusion

- 3.1 It is our client's belief that the Orsted proposals fail to consider the development proposals that are intended for this part of Greater Norwich. It will significantly impact on the client's ability to deliver existing and proposed development related to the Greater Norwich Food Enterprise Park and Honingham Thorpe. We believe that the cable route will potentially sterilise important development areas and compromise proposed layouts.
- 3.2 Our client respectfully requests that the points contained in this statement are fully considered within the examination process. Our intention is to submit a full written representation in due course and, if required, request that we can make oral representations if necessary.
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