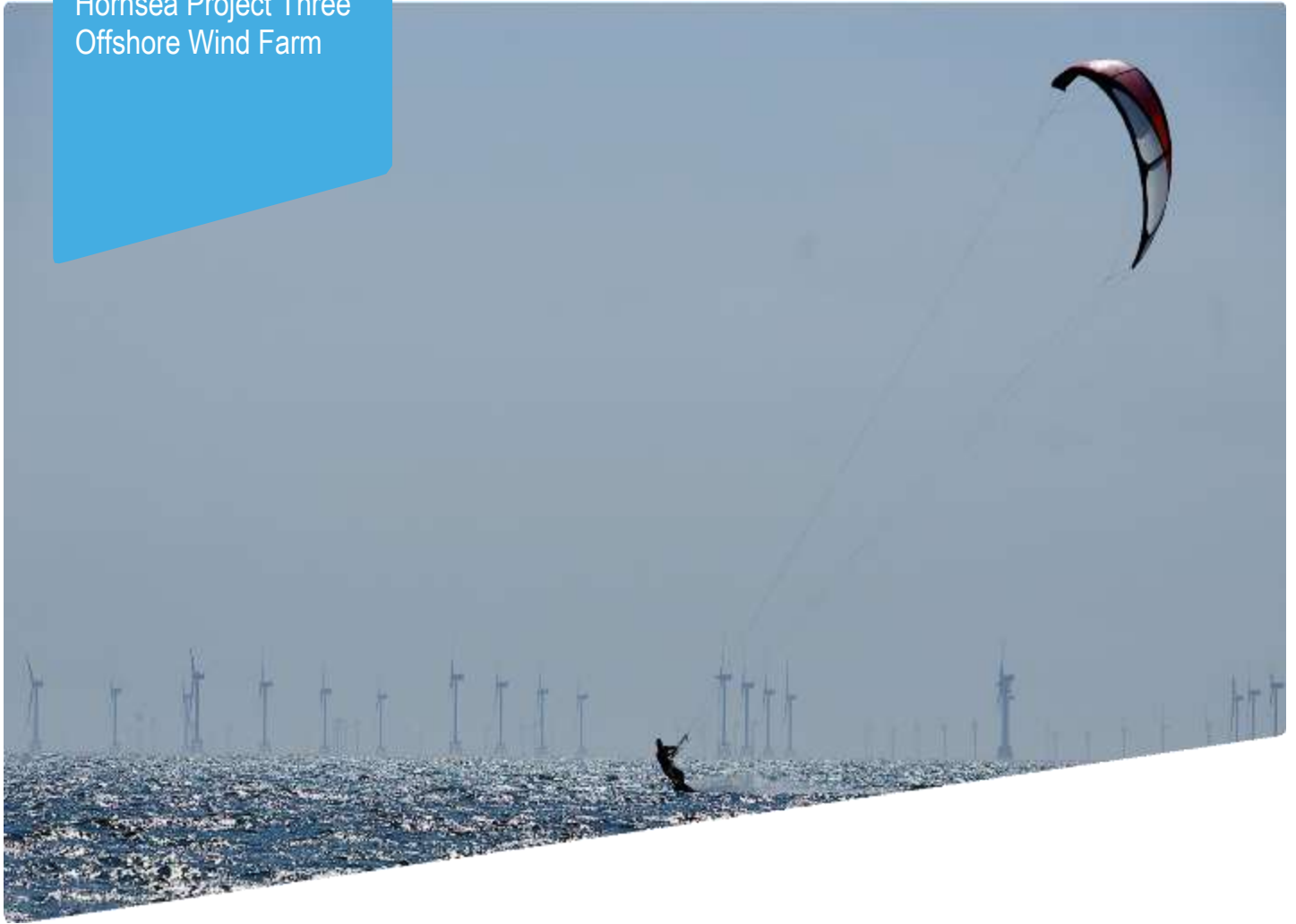


Hornsea Project Three
Offshore Wind Farm



Hornsea Project Three Offshore Wind Farm

Applicant's Comments to Broadland District Council Local
Impact Report submitted at Deadline 1

Date: 21st November 2018

Hornsea 3
Offshore Wind Farm

Orsted

Document Control			
Document Properties			
Organisation	Ørsted Hornsea Project Three		
Author	Sarah Drljaca (Ørsted)		
Checked by	Pinsent Masons		
Approved by	Andrew Guyton (Ørsted)		
Title	Applicant's Comments to Broadland District Council Local Impact Report submitted at Deadline 1		
PINS Document Number	n/a		
Version History			
Date	Version	Status	Description / Changes
21/11/2018	A	Final	Submission at Deadline 2 (21 st Nov 2018)

Ørsted

5 Howick Place,

London, SW1P 1WG

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1. Introduction

- 1.1 Broadland District Council (BDC) have submitted a Local Impact Report at Deadline 1 (REP1-053) providing a summary of relevant planning policy and planning history, as well as matters which remain under discussion between the parties, focusing on traffic and transport impacts associated with the main construction compound and the ongoing development of construction traffic management measures.

2. Broadland District Council Local Impact Report (REP1-053)

Summary Response

- 2.1 The Applicant would refer to the Statement of Common Ground between the Applicant and BDC submitted at Deadline 1 (REP1-099) which provides a summary of the matters agreed, and those which remain under discussion. The Applicant will continue to engage with BDC in respect to the matters outstanding with a view to addressing outstanding concerns.

Full Response

Broadland District Council Local Impact Report	Applicant's Response
<p>1.1 Following the preliminary meeting held in Norwich on 2 October 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, '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)'.</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>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>Noted.</p>
<p>2.1 This project is for an offshore windfarm by Orsted (Danish Energy Company) which would generate 2,400 MW of electricity, which as stated by Orsted would meet the daily energy needs of over 2 million homes. The location of Hornsea Project Three is within the North Sea to the east of Hull. The grid connection for the generated electricity is Dunston in South Norfolk. There are two key components of the project within Broadland these are; the cable route and the main construction compound at the former Oulton airfield.</p> <p>2.2 The wind farm consists of 300 turbines off the coast of Hull and will make landfall at Weybourne, North Norfolk with a buried cable route between Weybourne and grid connection at Norwich Main National Grid Substation. The route will run through three Local Authorities North Norfolk, Broadland and South Norfolk.</p> <p>2.3 The cable corridor will be 80m in width, within which is a 60m permanent easement post installation.</p> <p>2.4 The transmission system for the proposals of either HVAC or HVDC are still to be determined and it is understood that the applicant is due to make a decision on the transmission type to use during the detailed phase (post consent).</p> <p>2.5 The predicted construction period is 8 years over two phases.</p>	<p>Noted.</p>
<p>3.1 A separate offshore wind farm project by Norfolk Vanguard has been submitted to the Planning Inspectorate for an Order Granting Development Consent under PINS ref: EN010079, this proposes to take landfall at Happisburgh in North Norfolk with a connection to the grid at a substation</p>	<p>The Applicant would direct the Examining Authority to Volume 4: Annex 5.2: Cumulative Effects Screening Matrix of the Environmental Statement (APP-097) which includes a list of applications, some of which have been screened in for assessment in the onshore chapters. Norfolk Vanguard</p>

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<p>at Necton in Breckland District Council administrative area. The cable routes for the Norfolk Vanguard project run through Broadland District and the proposed Hornsea Three project cross at a point north of Reepham within the Broadland District. It is noted that the applicant has stated that it has entered into a co-operation agreement with Norfolk Vanguard to minimise the cumulative impacts of construction at the crossing location.</p> <p>3.2 Planning application ref: 20170052 – Greater Norwich Food Enterprise Local Development Order (LDO). Approved October 2017. The Order granted planning permission (subject to conditions) for an area of approximately 19 hectares to be used for agri.-tech and food processing purposes. The LDO site is in the parish of Honingham to the south of the A47 and is shown outside but adjacent to part of the proposed cable route.</p> <p>3.3 Planning application ref: 20181294- Milling tower building and 6 no. storage hopper silos for food processing and production, Greater Norwich Food Enterprise Zone, Honingham. Full approval 30 October 2018. This gives planning permission for the first development plot on the LDO site. To date development has not commenced.</p> <p>3.4 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>and the Great Norwich Food Enterprise Zone were included on this list. The Applicant prepared an update of cumulative developments submitted at Deadline 1.</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 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>Supplementary Planning Document:</p>	<p>The Applicant notes that in the Statement of Common Ground between the Applicant and Broadland District Council (BDC) submitted at Deadline I (REP1-099), BDC confirms that Volume 3, Chapter 4: Landscape and Visual Resources (APP-076), Chapter 5: Historic Environment (APP-077), Chapter 8: Noise and Vibration (APP-080), Chapter 9: Air Quality (APP-081) and Chapter 10: Socio-Economics (APP-082) of the Environmental Statement have identified all the appropriate plans and policies relevant to landscape and visual resources, historic environment, noise and vibration, air quality and socio-economics in the application area and due regard has been given to them in the assessments.</p> <p>The Applicant would note that a number of development proposals relevant to the Greater Norwich Local Plan were taken into account as set out in the Applicant's response to Q1.9.1 of the ExA's First Written Questions submitted at Deadline I (REP1-122).</p>

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<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 current consultation runs to 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>5.1 The preparation of this LIR and the identification of the impacts of the proposal have been made easier by the agreement to a Statement of Common Ground (SoCG) between BDC and the applicant, which will be submitted separately.</p> <p>5.2 It should also 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>5.3 As such BDC has concentrated on the specific outstanding material impacts over which we raise unresolved concerns, namely:</p> <p>a) Vehicular access to and from the main construction compound at the former Oulton airfield and its impact on highway safety and convenience and the amenities of neighbouring properties; and</p> <p>b) Impacts of construction traffic in Cawston.</p> <p>Taking each of these in turn:</p>	<p>Noted. As mentioned by BDC, the Applicant refers to the Statement of Common Ground between Broadland District Council and Hornsea Project Three which was submitted at Deadline 1 (REP1-099) for more detail on matters agreed between BDC and the Applicant.</p> <p>Each of the specific points identified by BDC is responded to by the Applicant below.</p>
<p>a) Vehicular access to and from the main construction compound at the former Oulton Airfield and its impact on highway safety and convenience and the amenities of neighbouring properties.</p> <p>5.4 The main construction compound for the entire on-shore construction phase is proposed to be located on part of the former Oulton airfield within the parish of Oulton. The former airfield is southwest of the small village of Oulton, part of the village and the surrounding area has been designated as a Conservation Area within the Blickling Conservation Area, with listed buildings in the vicinity. Oulton and the surrounding area are served by narrow country lanes. The applicant states that the construction period for the onshore works would be 8 years and could be built in two development phases.</p> <p>5.5 BDC has identified in its written response to the Examining Authority's question Q1.15.16 that a previous planning application for an anaerobic digester (AD) plant on part of the Oulton airfield was refused under District Ref: 20130860, as referred to above at paragraph 3.4. The proposed route for vehicles associated with the AD plant</p>	<p>The Applicant would refer to Appendix 20: Main Construction Compound Briefing note to the Applicant's Response to Deadline 1 (REP1-176) which provides an update on the nature of the main construction compound and a summary of the work undertaken up to Deadline 1 in respect to the access strategy, including how consideration has been given to previous planning history at the site.</p> <p>Although the Applicant considers that significant progress has been made in demonstrating a workable access strategy for the main construction compound, it is acknowledged that the measures set out in Annex A and B of Appendix 20 (REP1-176) in respect of Option 1: Passing Places are part of ongoing discussions with NCC (as local highway authority) and other interested stakeholders (including BDC and OPC). It is noted that the access strategies being developed, as reported in Annex A and B, take account of ongoing discussions with Norfolk Vanguard and are being designed such that they would provide an acceptable access solution within the cumulative scenario.</p>

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<p>was along The Street and then onto the B1149, this is the same route as the applicant's originally proposed to serve the on-shore construction compound. An appeal was submitted against the refusal and dismissed (PINS ref: APP/K2610/A/14/2212257) 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>5.6 BDC notes that a Code of Construction Practice has been prepared including works at the construction compound, which BDC is in general agreement with but has asked that the use and layout of the construction compound including electricity connection, fencing and lighting are detailed at the design stage and agreed through the final Code of Construction Practice to ensure no adverse effects on the historic environment, landscape or amenity considerations. This request has been agreed with the applicant.</p> <p>5.7 However the route and proposed arrangement of the vehicular access to and from the main construction compound to the B1149 and through Oulton village centre and the surrounding area for both heavy goods construction traffic and staff vehicles is still to be agreed and the applicant has produced a document dated September 2018 'Main Construction Compound Access Strategy' which proposes four alternative options which seek to achieve an acceptable vehicular access to and from the compound. To date there has been no agreement on which option will be pursued or the detailed access arrangements/highway works that are required to be proposed and precisely what the implications of these additional proposals would be. BDC welcome continued involvement and consultation with the applicant, the Highway Authority and Oulton Parish Council as the access strategy progresses and consideration needs to be given to any impacts on highway safety, hedgerows, trees, heritage assets and the residential amenities of the occupiers including The Old Railway Gatehouse which is a residential property that is located immediately adjacent to The Street at a point of a noticeable 'hump' in the road, which is the position of the former railway.</p> <p>5.8 BDC notes that the separate Norfolk Vanguard off-shore wind farm proposals, referred to in paragraph 3.1 above, also identify its own construction and access zones to the south of Oulton in proximity to the Hornsea Three proposals and therefore the cumulative impact of both of these proposals should also be considered at this stage.</p>	<p>As such for the purposes of Deadline 2, the work in respect to traffic and transport at the main construction compound is considered to be ongoing. Furthermore, as the access strategy to be implemented will have direct impacts on the associated noise and vibration, and air quality assessment – particularly at the residential property located along The Street (The Old Railway Gatehouse), this work is also considered ongoing.</p> <p>In respect to point 5.6 of the LIR, the Applicant would refer to the Statement of Common Ground between Broadland District Council and Hornsea Project Three which confirms that this point has been agreed between parties and the relevant updates incorporated into the Outline CoCP (REP1-142).</p>
<p>b) Impacts of Construction traffic in Cawston</p> <p>5.9 Since the publication of the PEIR it has become apparent that the proposed route of heavy goods construction traffic serving the proposed construction compound and part of the cable corridor will use the B1145</p>	<p>The Applicant would refer to the Statement of Common Ground between Broadland District Council and Hornsea Project Three (REP1-099) which notes that work is ongoing to develop traffic management measures to be included within the outline CTMP in respect to the road link through</p>

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<p>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>5.10 The information provided to date by the applicant 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 Norfolk Vanguard off-shore wind farm 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>5.11 It is understood that the applicants are seeking alternative options to reduce the number of heavy goods construction traffic movements in Cawston and 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>5.12 BDC notes that the separate Norfolk Vanguard off-shore wind farm proposals also identify its own construction and access zones around Cawston and therefore the cumulative impact of heavy goods construction traffic and staff vehicles in Cawston associated with both the Hornsea Three and Norfolk Vanguard proposals should also be considered at this stage.</p>	<p>Cawston Village. Should a need for mitigation be identified (in respect to associated impacts on the setting of heritage assets), Hornsea Three will continue to engage with BDC to inform the measures to be included in the final CTMP.</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</p>	<p>The Applicant has responded to individual points raised above and will continue to engage with BDC through the SoCG process.</p>

Broadland District Council Local Impact Report	Applicant's Response
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.	

