

# **LOCAL IMPACT REPORT**

## **BROADLAND DISTRICT COUNCIL**

**APPLICATION BY: Norfolk Boreas Limited for an Order Granting  
Development Consent for the Norfolk Boreas Project.**

**PLANNING INSPECTORATE REF: EN010087**

**DISTRICT COUNCIL REF: BOREAS LIR/002**

**REGISTRATION ID: 20022881**

**DEADLINE 2**

**DATE: DECEMBER 2019**

## 1.0 INTRODUCTION

- 1.1 This document is Broadland District Council's (BDC) Local Impact Report (LIR), which has been produced 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)*'.
- 1.2 In preparing this LIR the District Council 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).
- 1.3 The LIR relates only to the onshore elements and identifies the most relevant planning policies and the main issues that BDC has concerns over.

## 2.0 DETAILS OF THE PROPOSAL

- 2.1 This project is for an offshore windfarm by Norfolk Boreas which would generate 1,800 MW of electricity. The location of the Boreas offshore array is off the coast of Norfolk within the North Sea. The grid connection for the generated electricity is at Necton in Breckland District Council's administrative area. The key components of the project within BDC's area is the position and implications of the underground cable corridor and the works and activities required for its construction.
- 2.2 The wind farm consists of up to 180 turbines off the coast of Norfolk and will make landfall at Happisburgh in 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 District Councils.
- 2.3 As the Norfolk Boreas project is submitted by Vattenfall Wind Power Ltd. who also submitted the Norfolk Vanguard offshore wind farm proposals approximately one year ago (see 3.2 below) the two projects are linked but two scenarios are proposed and need to be assessed separately:

**Scenario 1** – Norfolk Vanguard proceeds to construction and installs ducts and other shared enabling works for the Norfolk Boreas project, including the pulling of two pairs of HVDC cables and associated communication cables through pre-installed ducts along the length of the cable route installed as part of the Norfolk Vanguard project, a 12km running track alongside the 45m wide cable route and a 300m extension to the access road installed by Norfolk

Vanguard to the onshore substation. A cable logistics area is proposed on an existing hardstanding on Heydon Road in the village of Oulton to allow the storage of cable drums and associated materials e.g. jointing kits. The facility may also accommodate a site office, welfare facilities and associated temporary infrastructure to support the cable pulling works.

**Scenario 2** – Norfolk Vanguard does not proceed to construction and the Norfolk Boreas project undertakes all works required as an independent offshore wind farm project including the installation of two pairs of HVDC cables along the 45m wide cable corridor route with mobilisation areas and compounds for trenchless crossings positioned in proximity to the cable route. The mobilisation areas will store equipment and provide welfare facilities, they will have a maximum area of 100m x 100m (or 150m x 100m if combined with a trenchless crossing compound) although the size will depend on the operational requirements and site constraints. During cable pulling, materials will be delivered directly to the jointing locations or a cable logistics area on an existing hardstanding in the village of Oulton as in scenario 1.

### **3.0 RELEVANT DEVELOPMENT PROPOSALS**

- 3.1 An offshore wind farm project by Orsted known as Hornsea Three which proposes to generate 2,400 MW of electricity from an offshore array of up to 300 wind turbines off the Norfolk coast in the North Sea was submitted to the Planning Inspectorate for an Order Granting Development Consent under PINS ref: EN010080. The transmission type proposed is either HVAC or HVDC. It is proposed to take landfall at Weybourne in North Norfolk with a connection to the grid at a substation near Swardeston in South Norfolk Council's administrative area. The underground cable route for the Hornsea Three project runs through BDC's area and the main cable construction compound is located with BDC's area at a former airfield in the village of Oulton. The project has been through its public examination process and the findings and conclusions arising from the examination together with the Examining Authority's recommendations have been sent to the Secretary of State for Business, Energy & Industrial Strategy for her decision.
- 3.2 Norfolk Vanguard is another offshore wind farm project which proposes to generate 1,800 MW of electricity from an offshore array of up to 257 wind turbines off the Norfolk coast in the North Sea was also submitted to the Planning Inspectorate for an Order Granting Development Consent under PINS ref: EN010079. The transmission type proposed is HVDC. It is proposed to take landfall at Happisburgh in North Norfolk with a connection to the grid at a substation near Necton in Breckland District Council's administrative area. The underground cable route for the Vanguard project runs through BDC's area with mobilisation zones along its length and the proposed cable route for the Orsted Hornsea Three project crosses it at a point north of Reepham within BDC's area. The project has been through its public examination

process and the findings and conclusions arising from the examination together with the Examining Authority's recommendations have been sent to the Secretary of State for Business, Energy & Industrial Strategy for her decision.

- 3.3 BDC 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. Appeal ref: APP/K2610/A/14/2212257.

## **4.0 POLICY FRAMEWORK**

- 4.1 The Development Plan comprises the following documents; the government's National Planning Policy Framework (2019) 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

Policy 3 - Energy & Water

Policy 5 - The Economy

- 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 EN3 - Green Infrastructure

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 (GNLP) – The Plan which covers BDC, Norwich City and South Norfolk Councils is being prepared and is presently at

its Regulation 18 consultation stage, the latest consultation on new, revised and small sites closed in 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. The next stage is the Regulation 18 Draft Consultation which is due to be published in January 2020. It is anticipated that the GNLP will be adopted late 2021.

## 5.0 IMPACTS OF THE PROPOSALS

- 5.1 It should be noted that the onshore issues of Water Resources and Flood Risk, Ecology, Ornithology, 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.
- 5.2 As such BDC has concentrated on the specific onshore matters of Ground Conditions & Contamination (Chapter 19 of ES), Land Use & Agriculture (21) Noise & Vibration (25), Air Quality (26), Human Health (27), Cultural Heritage (28), Landscape & Visual Impact (29), Tourism & Recreation (30), Socio-economics (31) and Onshore Cumulative Impacts (33). Outstanding material impacts over which BDC raises unresolved concerns, namely:
- a) The cumulative impacts of the construction traffic associated with the proposed Norfolk Vanguard wind farm, the Hornsea Three wind farm and the Norfolk Boreas wind farm on the village of Oulton and the surrounding area.
  - b) The installation of the cable route requires the removal of sections of hedgerow and trees; these removals will have to be assessed using the criteria set out in the Hedgerow Regulations 1997.
  - c) The cumulative impacts of the construction traffic associated with the proposed Norfolk Vanguard wind farm, the Hornsea Three wind farm and the Norfolk Boreas wind farm on the village of Cawston and the surrounding area.
  - d) The visual, public amenity and environmental impacts of the respective cable corridors crossing at a point north of Reepham.

Taking each of these in turn:

- a) **The cumulative impacts of the construction traffic associated with the proposed Norfolk Vanguard wind farm, the Hornsea Three wind farm and the Norfolk Boreas wind farm on Oulton and the surrounding area.**
- 5.3 Separate cable corridors and associated developments within BDC are proposed as part of the Hornsea Three offshore wind farm project and the Norfolk Vanguard offshore wind farm project. The cumulative impacts of these

two nationally significant infrastructure proposals together with the current Norfolk Boreas wind farm project need to be considered. In this respect it is noted that Hornsea Three have identified one main cable construction compound for all deliveries of cables and associated equipment and materials as well as the construction workers welfare facilities on part of the former airfield to the south west of the village of Oulton, outside of the designated Conservation Area which gain access to the B1149 via The Street. In addition, two mobilisation zones are proposed to the south west of Oulton as part of the Norfolk Vanguard project. Under both scenarios 1 & 2 Norfolk Boreas proposes a cable logistics area for storage of cable drums and other equipment and may also accommodate a site office, welfare facilities and associated temporary infrastructure to support the cable pulling works. All operators are proposing to use The Street in Oulton, which is a narrow country lane to connect to the B1149.

- 5.4 There are concerns about whether the construction programmes will overlap and therefore cause significant disruption in the village and the surrounding area in a wide variety of potential impacts for an extended period as a result of up to three nationally significant infrastructure projects taking place at the same time. Reference is made at para. 3.3 above to a previous planning application (BDC ref: 20130860 and the subsequent appeal) for an anaerobic digester plant on part of the former Oulton Airfield, where the Hornsea Three is to be located, 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 the residential occupiers of The Old Railway Gatehouse, which is a single storey dwelling immediately adjacent to The Street, Oulton, with reference to noise and disturbance. The Norfolk Boreas cable logistics area is on Heydon Road to the east of The Street and all vehicles accessing it will travel along The Street in proximity to The Old Railway Gatehouse.
- 5.5 Both the Hornsea Three and Norfolk Vanguard projects propose a mitigation scheme along The Street to include passing bays and junction improvements to the B1149/The Street junction and in proximity to The Old Railway Gatehouse which includes a re-grading of the carriageway to reduce the hump in the road, the formation of waiting areas either side of the property so that only single way vehicles can pass with a reduced speed limit and night time noise limits, together with the installation of an agreed noise barrier to the side of the garden of the Old Railway Gatehouse and possible replacement double glazing to the property. The District Council will expect that the Norfolk Boreas project also commits to these works in both scenarios.

**b) The installation of the cable route requires the removal of sections of hedgerow and trees; these removals will have to be assessed using the criteria set out in the Hedgerow Regulations 1997.**

5.6 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 of hedgerows and trees 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) The cumulative impacts of the construction traffic associated with the proposed Norfolk Vanguard wind farm, the Hornsea Three wind farm and the Norfolk Boreas wind farm on the village of Cawston and the surrounding area.**

5.7 It is 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 the High Street, which is a two way road that is narrow in places particularly in the village centre with no parking restrictions along its length and a significant number of vehicles park on the highway, especially along the High Street. The western part of Cawston is a Conservation Area and a number of properties along the High Street are listed residential and commercial properties which are located in close proximity to the road, some are Grade II\* listed.

5.8 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 the Norfolk Vanguard project, together with vehicles associated with the separate Orsted Hornsea Three project. The actual range of the increase, the type of vehicular movements that will be generated by the Norfolk Boreas project and the route of construction traffic on the highway network around Cawston must be considered and fully assessed.

5.9 Both the Hornsea Three and Norfolk Vanguard projects propose a traffic mitigation scheme within the village centre of Cawston along the High Street to include dedicated on-street parking areas, footway widening/carrageway narrowing with the formation of waiting areas either side of the centre so that only single way HGV's can manoeuvre through a section of the village centre at a time with a reduced speed limit and the carrageway re-surfaced. The mitigation scheme is still to be finalised in the respective Construction Traffic Management Plans, should approval for each project be forthcoming. As a result of the Norfolk Vanguard proposals the total number of HGV's passing

through the centre of Cawston were reduced and Norfolk Boreas should commit to match these or even reduce the level of HGV's required in scenario 2 with further detailed analysis of the additional cumulative traffic impacts as a result of development in scenario 1.

- 5.10 BDC welcomes continued involvement and consultation with the applicant, the Highway Authority and Cawston Parish Council as the number, type and periods of construction traffic activity are clarified and whether alternative routes for the construction traffic can be utilised. 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 secured BDC has serious concerns about the impact of the cumulative significant increase in heavy goods construction traffic in Cawston as a result of up to three nationally significant infrastructure projects.

**d) The visual, public amenity and environmental impacts of the respective cable corridors crossing at a point north of Reepham.**

- 5.11 Finally an assessment of the visual, public amenity and environmental impacts of the area north of Reepham, where the respective cable corridors cross needs to be carefully considered. The Hornsea Three cable corridor is 80m wide including a 60m wide permanent easement and the Norfolk Vanguard cable corridor is 45m wide, under both Norfolk Boreas scenarios the width of the cable corridor is 45m wide therefore the crossing point will be a significant focus of development over a pro-longed period. The area in which the respective corridors cross is an agricultural field with residential properties in the locality. The timing of these works needs to be co-ordinated to ensure that the visual, public amenity and environmental impacts are managed and minimised.

## **6.0 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 there are 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.