

From: [Waters, Laura](#)
To: [Norfolk Boreas](#)
Subject: RE: Response To Application Number EN010087 at Norfolk Boreas
Date: 06 December 2019 10:07:48
Attachments: [image002.png](#)
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[image004.png](#)
[NCC Response October 2019 Dudgeon and Sheringham Shoal Offshore Wind Farm Extensions Scoping Consultation.doc](#)

Your Ref: EN010087

Dear Sir/Madam

**Application by Norfolk Boreas Limited for the Norfolk Boreas Offshore Windfarm.
The Examining Authority's written questions and requests for information (ExQ1)
Issued on 19 November 2019**

In addition to the responses sent below, please find attached as requested the County Councils response to the Dudgeon and Sheringham Shoal Wind Farm scoping consultations

Regards

Laura Waters

Laura Waters,
Senior Planner MRTPI
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Norfolk County Council



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From: Waters, Laura
Sent: 06 December 2019 09:29
To: NorfolkBoreas@planninginspectorate.gov.uk
Subject: Response To Application Number EN010087 at Norfolk Boreas

Your Ref: EN010087

Dear Sir/Madam

Application by Norfolk Boreas Limited for the Norfolk Boreas Offshore Windfarm.
The Examining Authority's written questions and requests for information (ExQ1)
Issued on 19 November 2019

I refer to your requests for further information or written comments Issued on 19 November 2019.

Please find attached answers to the cumulative impact assessment, discharging of requirements and conditions and socio-economic effects of your request from Norfolk County Council (NCC).

Regards

Laura Waters

Laura Waters,
Senior Planner MRTPI
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Tel: 01603 638038
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Norfolk County Council response to: Dudgeon and Sheringham Shoal Offshore Wind Farm Extension EIA Scoping Report

October 2019

1. Introduction

- 1.1. The County Council (CC) welcomes the opportunity to comment on the above Scoping Report. The comments below are made on a without prejudice basis and the County Council reserves the right to make further additional comments on the Development Consent Order (DCO) application during the statutory consultation periods and at the Public Examination stage.
- 1.2. The Environmental Impact Assessment (EIA) / Preliminary Environmental Information Report (PEIR) will need to assess the wider economic benefits arising from the above wind farm extension both in terms of the scheme coming forward on its own and in combination with the other wind farms.
- 1.3. The remainder of this note sets out more detailed comments in relation to the County Council's statutory roles and responsibilities:

2. Highways and Traffic Access

- 2.1. The construction phase will generate the greatest number of vehicle movements. The transportation of materials and removal of spoil for the trenches will cause the greatest impact.
- 2.2. With the above in mind, the applicants will need to submit a full Transport Assessment (TA). The TA will need to assess the effects of the anticipated traffic upon driver delay; severance; pedestrian delay; pedestrian amenity; accidents; road safety; and impact from abnormal loads. In order to assist with determining the content for the TA, the applicants need to provide details of the following:

(a) Vehicles

- 2.3. Define the nature of the traffic likely to be generated. In addition, for the largest vehicles proposed to use each access route(s) this must include: -
 - minimum width (including unhindered horizontal space)
 - vertical clearance
 - axle weight restriction.

(b) Access and Access Route

- 2.4.
 - The anticipated volume of construction traffic needs to be identified for each individual route
 - detailed plans of site access/es incorporating sightline provision (with particular regard to the permanent access to the proposed substation)
 - Details of any routes to be stopped up
 - confirmation of any weight restrictions applicable on the route

- details of any street furniture along each route that may need to be temporarily removed/relocated
- Any roads to be crossed by open cut trench methods need to be agreed in advance with the Highway Authority. **NB – Norfolk County Council will seek to restrict open cut trenching on A and B routes at all times unless there is a technical reason why this is not possible.**

(c) Impact During Construction

2.5. Are any special requirements needed and if so provide details, for example:

- 2.6.
- Restrictions on the timing of construction works
 - removal of parked vehicles along the route(s) – full details will need to be provided including whether or not alternative parking arrangements are being offered or bus services provided in lieu of potential loss of ability to use private cars.
 - identification of the highway boundary along the construction traffic route (if required)
 - any modifications required to the alignment of the carriageway or verges/over-runs
 - identification of sensitive features along the route together with proposed mitigation measures
 - confirmation of any extraordinary maintenance agreement/s required by the Highway Authority
 - A Construction Traffic Management Plan
 - Measures proposed to avoid Impacts upon traffic during the tourist season – to be incorporated within the proposed traffic management plan.
 - Requirements for a Travel Plan (TP). If a TP is not going to be submitted, then justification needs to be provided.

(d) Specific Considerations

- 2.7.
- The cable route passes close to Oulton airfield which is intended to serve as a main compound for Hornsea 3; a mobilisation area for Norfolk Vanguard; and also a mobilisation area for Norfolk Boreas. The applicants need to identify any cumulative impacts arising from their proposals.
 - The cable route passes close Cawston village which accommodates construction traffic for Hornsea 3; Norfolk Vanguard and also Norfolk Boreas. The applicants need to identify any cumulative impacts arising from their proposals.
 - The traffic light junction at Harford has been identified as already being over capacity. It is anticipated this project will need to utilise this junction to for construction works to reach the substation. The applicants need to address this point. They also need to bear in mind Highways England have previously expressed concern with this junction due to potential for traffic to stack back to the A47(T) roundabout. Accordingly, the applicants also need to discuss this point at an early stage with Highways England.

- 2.8. Should you have any queries with the above highway comments please contact John Shaw email John.R.Shaw@norfolk.gov.uk

3. **Environment**

(a) Public Rights of Way

- 3.1. The installation of the on-shore cables has the potential to impact the Norfolk Coast Path, which follows the same route as the England Coast Path (ECP) in the locations where landfall is being considered. The Coast Path is managed by Norfolk County Council and is a heavily used recreational trail which brings significant benefits to the local economy. The County Council would wish to minimise impacts on this National trail during construction.
- 3.2. In addition to the Coast Path and the wider Public Rights of Way network, there are several County Trails and promoted circular walks that could be impacted during construction. Full details of County Council trails and promoted walks can be found on the County Council website <https://www.norfolk.gov.uk/out-and-about-in-norfolk>. We would particularly draw attention to the Marriott's Way which receives particularly heavy usage where it is crossed by the proposed cable corridor route in two separate locations. The Norfolk Trails team collect data on trail usage, and this can be provided for relevant locations in due course should it be required.
- 3.3. The Construction Code of Practice Document, and the Public Rights of Way Management Plan (presumably part of the former document), will be the method that will be used to agree potential impacts on the ECP, Norfolk Trails, the PRow network and other promoted walks. The County Council agree with this approach and will work with the applicant in this regard.

(b) Ecology Comments

- 3.4. The EIA will be supported by an information to support a HRA and the applicant intends to undertake the Ecological Impact Assessment (EclA) in accordance with guidelines published by the Chartered Institute of Ecology and Environmental Management (CIEEM) – Please note that EclA guidelines were updated in [2019](#) and that the new guidelines should be followed.
- 3.5. Table 3.13 states that the applicant is proposing to undertake the following surveys:
- Extended Phase 1 Habitat Survey (including non-native Invasive Species);
 - Badgers
 - Water vole and otter
 - Breeding birds
 - Great crested newts
 - Reptiles
 - Dormice
 - Bats: activity and emergence surveys

- Botanical surveys, and
- Wintering bird surveys

3.6. Ecological surveys will need to be undertaken at the appropriate time of year in accordance with best practice guidelines (outlined in paragraph 677) and by suitably qualified and experienced surveyors (please state surveyor name, licence numbers and experience where applicable);

We would encourage the applicant to undertake reptile surveys on all land that has potential to support this species rather than concentrating on '*on habitats that may support significant populations*';

The scope of ecological surveys, which will be refined following the Phase 1 survey, needs to consider species for which sites are designated e.g. the White clawed Crayfish;

Important hedgerows, as defined by the Hedgerows Act 1997 will need to be identified;

Complete baseline data should support the EIA to ensure certainty in the conclusions, beyond reasonable doubt, that no Adverse Effects will result from the proposed proposals alone, and in combination with other proposals;

We welcome the proposal for liaison with the applicant as to the approach and methodology for data collection. The survey methodology for the PEA, and any subsequent habitat or species-specific surveys should be agreed with Natural England, the EA and the county ecologist, as appropriate, in advance of the surveys being undertaken;

All ecological data (including that from pre-construction and post construction monitoring) should be submitted to the Local Records Centre, in a timely manner and in a form that is readily accessible;

Table 3.9 European designated sites within 20km - Paston Great Barn SAC is not the only known barbastelle maternity roost in Norfolk. It was when the site was designated. The Norfolk Barbastelle Study Group be approached for data.;

Specialist local wildlife groups could be approached for local records, including Norfolk Barbastelle Study Group;

When selecting the onshore cable route, significant impacts on statutory and non-statutory designated sites should be avoided wherever possible, and where impacts cannot be avoided, appropriate mitigation or compensation put in place;

Consideration should also be given to securing biodiversity net gain

(c) Landscape Comments

- 3.7. Suitable methodology has been proposed for the SLVIA (Seascape, Landscape and Visual Impact Assessment) including best practise guidance from The Landscape Institute with the Institute of Environmental Management and Assessment (2013). Guidelines for the Assessment of Landscape and Visual Impacts, Third Edition (GLVIA3) and Landscape and Seascape Character Assessments published by Natural England and the Department for Environment, Food and Rural Affairs (2014).
- 3.8. The study area has not currently been defined but should reflect best practise and ensure that where potential long distance views are possible, the study area is enlarged to reflect this. This will be particularly pertinent in areas of low-lying topography where the landscape will allow broad views across large expanses of landscape and seascape.
- 3.9. Suitable data sources have been identified to source Landscape Character Areas and information about smaller designated and important landscape. No mention is made of the 'Seascape character area assessment: East Inshore and East Offshore marine plan areas' produced by the Marine Management Organisation, this may be useful to refer to when undertaking the seascape element of this assessment. It should also be noted that the Norfolk Coast Area of Outstanding Natural Beauty does run south of Mundesley in a small separate section.
- 3.10. The identified visual receptors appear broadly correct for during construction, operation and decommissioning. Suitable mitigation should be proposed to minimise both the visual and landscape impacts, especially to residential and recreational uses, consideration should also be paid to the timing of construction work in relation to the tourism season when visual receptors will increase, giving rise to a much more significant impact.
- 3.11. Should you have any queries with the above environmental comments (a - c) please contact Emily Smith (Green Infrastructure and Landscape Officer) – email Emily Smith emily.smith2@norfolk.gov.uk

3.12. **(d) Historic Environment**

- 3.13. The Historic Environment team welcome the approach taken by the applicant's consultants Royal Haskoning in relation to archaeology and the historic environment more generally. We note that approach outlined in the EIA scoping report is similar to that taken for The Vanguard/Boreas scheme and values the inclusion of specialist historic environment survey work in addition to archaeological desk-based assessment and built heritage impact assessment at the EIA stage.
- 3.14. Our specific comments are as follows:

Paragraph 704, Table 3-15. Row 2, we welcome the recognition that a full NHER search will be required. Non-designated buildings with HER records do not necessarily equate with buildings regarded as local listed by North

Norfolk District Council. An NHER record for an undesignated building is not an indicator of its significance;

Paragraph 704, Table 3-15, Row 4. The Existing archaeological studies and published sources should also include the archaeological assessment carried out in relation to the Hornsea 3 onshore cable route;

Paragraph 705, Table 3-16, Row 3 and Paragraphs 706 and 707. We welcome the recognition that geophysical and trial trenching will be required at the pre-consent stage and recommend that Norfolk County Council Environment Service historic environment strategy and advice team are consulted at the earliest stage regarding the areas to be targeted;

Paragraph 708. Needs to include reference to *Standards for Development-led Archaeological Projects in Norfolk* (see below);

Paragraph 709. We would expect historic map regression to cover all of the onshore project boundary;

Paragraph 710. We assume that the Aerial Photographic and LiDAR assessment and the Geoarchaeological desk-based review will cover all of the onshore project boundary;

Paragraph 710. The Geoarchaeological desk-based review needs to also take into account NHER data relating to finds of Palaeolithic date and include an assessment of potential and impact assessment relating specifically to Palaeolithic archaeology.

- 3.15. Should you have any queries with the above historic environment comments please contact John Percival (Historic Environment – Senior Officer Strategy and Advice) - email John Percival john.percival@norfolk.gov.uk
- 3.16. Norfolk County Council introduced *Standards for Development-led Archaeological Projects in Norfolk* and a new historic environment strategy and advice charging schedule on 1 May 2018. Please visit <https://www.norfolk.gov.uk/libraries-local-history-and-archives/archaeology-and-historic-environment/planning-and-the-historic-environment> for copies.

4. **Economy and Skills**

- 4.1. It would be helpful if the EIA/PEIR could provide accurate figures of those likely to be employed during construction of the wind scheme, both in terms of the onshore and offshore work force. There should also be a statement as to whether the labour would be sourced from local firms or from further afield as well as consideration of using local supply chains during the construction phase. There needs to be an indication of the likely numbers employed in the longer term once the extended wind farm is in operation i.e. how many jobs will there be in the operations and

maintenance of the scheme.

- 4.2. While Norfolk County Council recognises the likely economic and environmental benefits arising from the proposed extended wind farms, it is felt that the EIA should consider the wider education, skills and employment opportunities during and after construction of the scheme. The County Council would therefore suggest that the applicant develops an Education; Skills and Employment Strategy which will form part of the DCO application to address the above issues. Such strategies have been taken forward with other NSIPs covering, for example, the offshore wind energy sector developments.
- 4.3. Should you have any queries with the above comments please contact the Norfolk County Council's Economic Development Manager – David Dukes david.dukes@norfolk.gov.uk and/or the Employment and Skills Manager - Jan Feeney jan.feeney@norfolk.gov.uk

5. **Lead Local Flood Authority (LLFA)**

- 5.1. The LLFA strongly recommend that any EIA includes Flood Risk Assessments (FRA's) and surface water drainage strategies that address
- Local sources of flood risk, including those from ordinary watercourses, surface runoff and groundwater
 - How surface water drainage will be managed on the substation sites and show compliance with the written Ministerial Statement HCWS 161 by ensuring that Sustainable Drainage Systems for the management of run-off are put in place.
 - Post construction ground levels not disrupting current overland flow routes along and across the alignment of the proposed underground cables for land at risk of flooding.
 - Temporary arrangements to maintain overland flow paths that cross the alignment of the proposed underground cables for land at risk of flooding.
 - The requirement to seek consent from Norfolk County Council (NCC) for works that affect the flow in ordinary watercourses outside of the control of an IDB.
- 5.2. This supporting information would assess the potential for the development to increase the risk of flooding from the proposal or how surface water runoff through the addition of hard surfaces. It will show how this will be managed to ensure that the development does not increase flood risk on the site or elsewhere, in line with National Planning Policy Framework (paragraph 103).

In this particular case this would include appropriate information on:

- Sustainable Drainage Systems (SuDS) proposals in accordance with appropriate guidance including “Non-statutory technical standards for sustainable drainage systems” March 2015 by Department for Environment, Food and Rural Affairs.

- 5.3. With particular reference to Section 3.2 Water Resources and Flood Risk, the LLFA welcome that the Scoping report indicates that Flood Risk Assessments (FRA's) will be undertaken and we recommend these will be based on the requirements of the National Planning Policy Framework (NPPF) and in line with Planning Practice Guidance (PPG).
- 5.4. The LLFA also welcome that the applicant indicates that the FRA will inform the identification of any required mitigation measures. These should include drainage strategies and we recommend that appropriate SUDS features are included in the design assessment of the proposed development in accordance with policy guidelines.
- 5.5. Once the potential sites for the Substation and route location for the cables have been finalised we would expect a drainage strategy to assess and justify compliance with the SuDS hierarchy for surface water disposal location. This would include:
- Demonstration of infiltration testing completed to BRE365 requirements or equivalent (including 3 infiltration tests in quick succession at each location tested, each location would be representative across the site and be at depths anticipated to be used on site). A description of where any infiltration is anticipated to be used in full or partially drained SuDS components within a strategy.
 - If site wide infiltration is not appropriate due to unfavourable rates, demonstration with evidence as to why there cannot be a connection made to the nearest watercourse.
 - As a final option, demonstration with evidence that Anglian Water would accept a connection to a surface water sewer.
- 5.6. The drainage strategy should also contain a maintenance and management plan detailing the activities required and details of who will adopt and maintain the all the surface water drainage features for the lifetime of the development.

We note the following constraints from the scoping report and welcome these considerations that are applicable to Flood and Water Management issues:

- Proximity to residential properties,
 - Proximity to Source Protection Zones (SPZ),
 - Flood risk,
 - Minimise requirement for complex crossing arrangements, e.g. road, river, rail and other pipeline crossings,
 - Other infrastructure
- 5.7. Further to the criteria mentioned above the LLFA note the flowing settlements have historical flooding issues and are likely to be sensitive to disruptions to the wider drainage networks:

North Walsham – Drains to the North east (North Walsham and Dilham Canal) and South West (Skeyton Beck); and

Dereham – Drains to the East (via Dereham Stream to Wending Beck).

- 5.8. Generally, any proposed cable route will likely cross watercourses within the catchments of the River Yare, the River Bure and the River Wensum. There are significant lengths of potentially affected Watercourses in the search area that are controlled by the Norfolk Rivers IDB for which they will need to be consulted on separately.
- 5.9. Please note, if there are any works proposed as part of this application that are likely to affect flows in an ordinary watercourse outside of the IDB areas, then the applicant is likely to need the approval of the County Council. In line with good practice, the Council seeks to avoid culverting, and its consent for such works will not normally be granted except as a means of access. It should be noted that this approval is separate from planning. The LLFA would appreciate the applicant advising Norfolk County Council's Water Management team, as soon as practicable, the approximate number of crossings of Ordinary Watercourses and the required timeframes for approval. This will enable us to have adequate staffing resources in place to ensure approvals are not unduly delayed. Please be aware that it takes up to 8 weeks for a consent to be processed. The Flood and Water management team are happy to engage in this process prior to application, and now offer a chargeable Pre-App service.
- 5.10. The LLFA would advise the applicant that the CIRIA SuDS Manual C697 (2007) has recently been updated, report C753 (2015) is now available free on the CIRIA website. We expect any information submitted after 12 March 2016 to use the 2015 SuDS Manual.

On the 19th February 2016, the Environment Agency updated the guidance on climate change allowances for peak river flow and rainfall intensity. The information for the Anglian Region and transitional arrangements for use within the planning process can be found at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>. We highlight that peak river flow climate change allowances should be considered for ordinary watercourses as well as main rivers.

Please also note that The LLFA guidance has been updated, and that the advice to use FSR rainfall information if the critical storm duration is less than 1 hour has been removed. Only up to date FEH data will be requested in the future.

- 5.11. Further guidance for developers can be found on our website at <https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers>
- 5.12. If you have any further queries please contact Lucy Perry (Flood Risk Officer) email llfa@norfolk.gov.uk

6. Minerals and Waste

6.1 Norfolk County Council in its capacity as the Mineral and Waste Planning Authority for Norfolk has the following comments to make on EIA scoping report for the Dudgeon and Sheringham Shoal Offshore Wind Farm Extensions.

6.2 **Local planning policies and designations** - The adopted Norfolk Minerals and Waste Core Strategy and Development Management Policies DPD and the Minerals and Waste Site Specific Allocations DPDs are relevant local planning policies and should be taken into account throughout the project.

6.3 3.1.2.1 Potential impacts during construction

Paragraph 582.

The recognition of the potential for direct impacts to Mineral Safeguarding Areas is welcomed.

6.4 3.1.2.2 Potential impacts during operation

Paragraph 586.

The recognition of the potential for direct impacts to Minerals Safeguarding Areas is welcomed.

6.5 Table A1-14

The inclusion of the NPS requirements EN-1-5.10.9 and EN-5.14.6 regarding mineral safeguarding and waste are welcomed.

6.6 To ensure mineral safeguarding is appropriately taken into account, the ES should consider how a methodology can be put in place for the reuse of suitable materials extracted as part of the cable construction phases.

6.6 Should you have any queries with the above comments please contact Richard Drake (Senior Planner Minerals and Waste Policy) on 01603 222349 or email on richard.drake@norfolk.gov.uk