

PLANNING ACT 2008

INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

**WRITTEN SUBMISSIONS OF NFU REGARDING THE NORFOLK BOREAS OFFSHORE WIND FARM
DEVELOPMENT CONSENT ORDER APPLICATION BY NORFOLK BOREAS LIMITED
PLANNING INSPECTORATE REFERENCE NO EN010087**

**SUBMISSIONS OF NATIONAL FARMERS UNION ON THE – EXAMINERS FIFTH WRITTEN QUESTIONS
AND APPLICANT’S ANSWERS TO DEADLINE 14.**

DATE 1st SEPTEMBER 2020

1.0 Introduction

1.1 Submissions on behalf of the National Farmers Union (“NFU”) in respect of the application for a Development Consent Order (DCO) by Norfolk Boreas Ltd for Norfolk Boreas Offshore Windfarm. The NFU is making a case on behalf of its members and LIG on behalf of its clients who are affected by the DCO.

2.0 Applicants Response to Fifth Written Questions

2.1 Lighting

NFU and LIG would like to understand better the different lighting proposals during construction and post construction

2.2 **4.Cumulative Impact: Q5.4.0.12: The Crossing with Hornsea Three OWF, North of Reepham.**

The outline wording submitted to Q5.4.0.11(b) is acceptable but the NFU and LIG would like as stated in their response to Examiners Fifth Written Questions to confirm that the method statement agreed must include the wording ‘least disruptive to agricultural land and be the most thermally efficient’. Further we would like the wording in answer (c) from the Applicant to be drafted within the method statement.

The NFU and LIG do not agree with Vattenfall that it is not appropriate to include a method statement in this regard in the OCoCP at this stage. The NFU and LIG believe that it is essential that this outline method statement is captured either within the OCoCP or the DAS.

The wording as outlined in the Applicants response to Q5.4.0.11(f) that both parties “must act in good faith and use reasonable endeavours to co-operate with, and provide assistance to, each other as may be required” under protective provisions is **not** specific enough for how the cables should be installed at the crossing point. The NFU and LIG accept that a final method statement may need to be agreed after the consent of the DCO but the outline method statement as stated above must be included within the DCO as the base principal which will be followed.

2.3 **Q5.9.5.8: Design and Access Statement and Outline Landscape and Ecological Management Strategy**

The NFU and LIG are concerned that there is too much responsibility being placed on Breckland Council to approve the layout, scale and external appearance of the onshore project substation as stated at paragraph 66. The NFU and LIG are aware that Breckland Council is under resourced and the design documents for the substation will require time, understanding and substantial input to make sure that the substation fits into the landscape as best as possible. Again, at paragraph 67 it is stated that the Applicant will at an early stage engage with Breckland Council in regard to reviewing the mitigation and landscape proposals and the

architecture of the convertor building. The NFU and LIG would like the two landowners directly affected by the substation to also be involved at this early stage particularly in regard to the landscape proposals.

Paragraph 71: The NFU and LIG understand that sheet metal may be the most appropriate material to use to clad the convertor station and that it is used on most modern agricultural buildings but consideration will need to be taken into account of the height of the convertor station which is to be much higher than a normal agricultural building. The NFU and LIG think that further consideration should also be given to the timber board design as highlighted in figure 4 on page 39 in the preliminary guide. No actual specific technical reasons have been given for the use of metal sheeting. It may be that the use of timber boarding with metal sheeting might help in the design of the convertor building blending into the landscape. Due to the height of the building the colour used on the metal sheets will need careful design. The NFU and LIG are in agreement to the style being a modern style shed structure which is simple in form this will also follow the style of many agricultural buildings in the area.

Paragraph 72: It is stated that the information in the preliminary design guide will inform the development of the design guide. The NFU and LIG believe that local stakeholders in particular the landowners affected and the local community of Necton Village should be able to first comment on the information provided in the preliminary design guide as is stated in appendix 3.

Paragraph 73: As stated above the NFU and LIG would like the two landowners directly affected by the convertor building to be included in the final decision of what material is used to cover the structure of the building which will then lead on to local stakeholders being consulted on the material, finish and colour.

The NFU and LIG would like to see the detail in the second part of paragraph 73 outlined in a new paragraph as this wording is to do with the landscaping around the building as set out below:

“It is also recognised that the local community have experience of growing trees and other plants in the local area. Through consultation on the Design Guide, the Applicant would welcome the opportunity to share local knowledge on native species that are suited to local conditions. This would ensure that the ‘palette’ of species selected would present the best opportunity for successful establishment and growth”.

The NFU and LIG would like to see two clear parts to the design guide, part 1 focusing on the material, the finish and colour used for the building and part 2 focusing on the landscaping and the planting to be carried out. There will be local stakeholders who may have vast experience in building design and colours and others who have great knowledge in landscape design and tree planting. Vattenfall must make use of this knowledge.

Paragraph 74: The NFU and LIG think it is essential that the plans as outlined in this paragraph are shared and consulted on with local stakeholders. It is going to be very important to state in the Design Guide how and when local stakeholders will be consulted to make sure that this consultation is carried out.

Plate 4 and Paragraph 77: The NFU and LIG would like to see that landowners affected and some local stakeholders should be consulted on the 'Provisional details on layout, scale and design are developed' as stated in the second bubble and should also be involved in the design guide with Breckland Council. The NFU and LIG do not believe that it should be down to Breckland Council in agreeing what aspects highlighted in the design guide are open to influence by local stakeholders. Further Breckland Council should not have the final say on the final design. This should be done through an elected local forum.

Paragraph 78: As stated in this paragraph it will be important to consider who should be involved in any stakeholder analysis.

Paragraph 80: The NFU and LIG would like to see the desired process that will be used for engagement and consultation being set out now and agreed as part of the DCO. It cannot and should not be left to the Applicant and Breckland Council.

Paragraph 82: The NFU and LIG feel that it is very important that the information gathered from the engagement with local stakeholders is carried out and implemented and the final design cannot be changed. It therefore should not be that Breckland Council has the final say on the design this must come from the local forum which is elected to represent the local stakeholders.

3.0 Onshore project substation and National Grid Substation Extension Landscaping

Paragraph 96: The NFU and LIG would like to see that it is stated that Norfolk Boreas must plant trees both 'nurse' and 'core' species which are a mix of whips and well established young stock. It is important that some planting is already established to help the building fit in to its surroundings quicker. Waiting 20 years for the nurse stock to reach 8m in height is too long. When the building is 19m in height nurse stock at 8m is not going to provide substantial screening of the building.

Paragraph 97: It is important the landowners directly affected and the elected local forum have a say in the landscaping works design.

It is stated that the bund could be 2m in height using material which will be excavated to level the site for the building. The NFU and LIG would like further clarification on the width of bunding proposed for the landscape planting and how these groundworks will assist reduce the height of the convertor station.

Planting should also take place on all sides of the convertor building and the width of screening needs to be increased from the specified width of 7m (as set out in OLEMS document 8.7) to 30m to allow for the best possible visual and noise mitigation.

4.0 Other matters

4.1 NFU and LIG seek a commitment from Vattenfall that the woodland will be maintained throughout the lifetime of the convertor station to ensure that the mitigation measures continue to be effective.

4.2 Fencing needs to be erected including deer fencing. NFU and LIG would like further clarification of the fencing proposal.