

# **Local Impact Report for Equinor New Energy Limited Makes land fall at Weybourne for the Sheringham Shoal Offshore Wind Farm Extension Project and Dudgeon Offshore Wind Farm Extension Project by BROADLAND DISTRICT COUNCIL**

Your reference EN010109

## Introduction

This Local Impact Report (LIR) has been prepared by Broadland District Council 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)*'.

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).

The LIR relates only to the onshore elements and identifies the most relevant policies and the main issues the Council has concerns over.

## Details of the proposal

The Application is for development consent to construct and operate two offshore wind farm generating stations, known as Sheringham Shoal Offshore Wind Farm Extension Project (SEP) and Dudgeon Offshore Wind Farm Extension Project (DEP), both located off the coast of Norfolk (together "the Projects"). SEP is the proposed extension to the operational Sheringham Shoal Offshore Wind Farm and will comprise up to 23 wind turbine generators, together with the associated onshore and offshore infrastructure. The offshore export cable corridor from SEP to landfall will be approximately 40km in length and the onshore cable corridor will be approximately 60km in length. DEP is the proposed extension to the operational Dudgeon Offshore Wind Farm and will comprise up to 30 wind turbine generators, together with the associated onshore and offshore infrastructure. The offshore export cable corridor from DEP to landfall will be approximately 62km in length and the onshore cable corridor will be approximately 60km in length.

The project 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.

## Relevant development proposals under consideration or granted permission but not commenced or completed

National Highways NSIP: A47 North Tuddenham to Easton – TRO10038, granted consent 22 June 2022

Norfolk Boreas Off-Shore Windfarm – EN010087, Consent granted – 10 December 2021

Norfolk Vanguard Off-Shore Windfarm – EN10079, Consent granted 11 February 2022

Hornsea Three Off-Shore Wind Farm NSIP - EN010080, consent granted 31<sup>st</sup> December 2020 and discharge of requirements being submitted to LPA's

Land at Honingham, adjacent to Easton  
Greater Norwich Food Enterprise Zone Local Development Order ref 20170052

20211249 & 20211288 Land North of The Street Cawston  
Ground mounted solar farm including associated infrastructure. Approved with conditions.

Relevant development plan policies, supplementary planning guidance etc

The following policies are considered relevant to the consideration of this application (relevant extracts of each policy are attached as Appendix 1).

Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS) adopted in March 2011, amendments adopted January 2014.

Policy 1 : Addressing climate change and protecting environmental assets  
Policy 2 : Promoting good design

Broadland District Council Local Plan  
Development Management DPD (DM DPD), adopted August 2015.

Policy GC4: Design  
Policy GC5: Renewable Energy  
Policy EN1: Biodiversity and Habitats  
Policy EN2: Landscape  
Policy EN3: Green Infrastructure  
Policy EN4: Pollution

The relevant issues are considered to be as follows:

*Heritage Assets*

Heritage issues arise from the underground cabling. This includes impacts on conservation areas and listed buildings which should be assessed in relation to policy EN2 of the DMDDPD and Section 16 of the NPPF.

The Council note that para 107 of the applicants submissions states:  
“The assets identified above were found to either not share intervisibility or had limited intervisibility with the onshore substation and associated infrastructure and the offshore infrastructure. This was considered to have little to limited change on

their setting, and due to their distance from the above ground onshore and offshore project infrastructure, no significant impacts to heritage setting (and associated importance) were identified and no further action is considered to be required.”

The Council agrees with this assessment.

In the Council’s relevant representation, it raised that further clarification needed to be undertaken regarding the impact of the project on Honingham Hall Park which is a historic parkland and garden although not registered which is identified on Historic Environment record and can be considered a non-designated heritage asset. The applicant has acknowledged that the Park is a non-designated heritage asset and has responded to the Council advising that they are proposing a Trenchless route section of the cabling where the route crosses the historic parkland. The Council welcomes this approach.

The Examining Authority has in its questions, has asked the Council to set our position on the significance of Honingham Hall Park as a non-designated asset and the features that contribute to its significance and setting. Also, in accordance with the NPPF, set out the harms weighed against the public benefits. Whilst the Council has responded to the question separately, it considered that the comments should also form part of this report.

The Council would comment as follows:

*Honingham Hall Park is the historic parkland created for and associated with Honingham Hall. The Park is identified on the HER (NH44183). The hall, which originally dates to 1607, was demolished in 1966 although the coach house and stable buildings remain and are listed (List UID: 1372666). The parkland is shown in 1797 Faden’s historic map. Late C19 OS maps show areas of plantation within the parkland of the hall and the two areas which the cable will run through the linear feature “The Broadway” to the north and “Ringland Covert” further to the southeast. The areas associated with the hall in terms of ownership varies over time however these are clearly landscape features associated with the estate. From the 1880s OS map there is an approach drive to the hall from the Northeast – where there is a lodge, through the tree plantation. The Broadway feature is more of plantation planting to estate farmland and the lane to provide an edge to the estate land. A now demolished building called Breck Farmhouse was at the centre of a field system to the southeast of it where there are no planted field trees on the OS Map so this tree planted area is more peripheral to the estate. With the loss of the hall and estate and changes to the parkland character, these plantation areas are considered to have a low degree of heritage significance as non-designated heritage asset which are of local importance only.*

*With the loss of the hall, the division of the parkland and return to arable, the plantation areas are surviving remnants of historic estate management and parkland associated with the former hall within the surrounding landscape. When passing through the plantation area the cable will be tunnelled at a depth of 10m under the trees so they will not be affected. This is shown on sheet 12 document 6.2.4. In the short term there will be some minor harm from trench digging within the parkland fields which over time will revert back to the original appearance. Overall, therefore it*

*is considered that there will be minor short term harmful impact which is low adverse and no long-term harmful impact to the heritage asset so the proposals are not considered to result in any harm in the long term and negligible harm in the EIA matrix. Paragraph 203 has been taken into account and it is considered that there is no requirement to carry out a planning balance assessment.*

### *Landscape and visual impact*

The key landscape and visual impacts will result from the laying of underground cabling in respect of the removal/loss of hedgerows, trees and the impact on the landscape character and visual amenities of the area. Policies GC4 and EN2 of the DMDPD are relevant in the consideration of the proposal.

Landscape and Visual Impact – The Council is satisfied that the work has been undertaken in accordance with the accepted industry guidance. Whilst there are some points of detail that may merit further scrutiny/debate, which is often the case when judgement is involved overall, generally we concur with the findings.

In respect of the impact of the cable route, the Arboricultural Survey Report survey identifies the trees and constraints within parts of the DCO boundary, but not all. The Council considers that the tree/hedge details for the whole corridor should be provided, this should also include veteran trees which maybe outside the corridor but could still be impacted. Although it is accepted that currently no veteran trees/ancient woodland are shown to be removed or impacted on, as stated above we still do not have a survey for the whole route. The only veterans/ancients which have been picked up are those which are recorded on the Ancient Woodland/tree Inventory. The Council know that there are many smaller ancient woodlands and veteran trees which are not recorded, so again in the absence of a full survey we cannot say categorically that none will be lost or harmed by the proposed development. This applies to trees within the DCO boundary as well as those outside but still within buffer zones.

Currently there is not an assessment in line with the 1997 Hedgerow Regulations, in the absence of the information in terms of the ‘importance’ of hedgerows under the Hedgerows Regulations and assessment of trees implicated in the scheme, it is not possible to conclude on the impacts of the cable route. Our local plan policy DM4.8 presumes in favour of retention of important hedgerows unless the need for, and benefits of, a development clearly outweigh their loss.

The Council understands that any section of hedgerow that has to be removed as part of the cabling will be replanted, which does lessen the concern about potential loss of ‘important’ hedgerows (especially if their status is solely because of an historic line). However, we need to be clear as to when replanting may not be the possible, or when the ‘importance’ of a hedgerow cannot be safeguarded.

From experience of other NSIPs in the Councils area, the Council would bring to the Examiners attention that the lack of a full survey’s at the time of the assessment and consideration of the DCO has led to a greater loss of trees/hedges and woodlands at the Discharge of Requirements stage that had been accounted for during that determination. Not only has this put the Council in a difficult position wishing to

protect its natural environment, but also has not enabled the full implications of the proposed development to be considered during the determination of the development, as it should be. Furthermore, the Council has had to deal with additional hedge/tree removal outside of the order limits to facilitate NSIP development, this makes it difficult to ensure adequate mitigation/compensation is provided.

It is also noted as above that the cable route is passing through Honingham Park and the loss of trees could have a harm on the Landscape Character of the parkland. The applicant has responded to the Council advising that they are proposing a Trenchless route section of the cabling where the route crosses the historic parkland. The Council welcomes this approach.

### *Noise and Pollution*

The key noise and pollution considerations are the impacts of the construction of and the operation of the proposal on the amenities on local residential in respect of air quality, water quality, noise and vibration, light pollution etc. Policy GC4 and EN4 of the DMDPD are relevant to the consideration of the proposed development.

The Council considers that the documentation would indicate that the proposal could take place (both the construction and operational phase) without an unacceptable impact on residents, if managed and operated appropriately.

In view of the above, with regards to specified works to be undertaken issues relating to Control of Noise, Air Quality, Artificial Light, Waste Management, Pollution Prevention, Contamination Assessment and Mitigation and Working Hours are adequately covered by the Requirements in the Draft DCO. The Council is in general agreement and appreciates that the exact wording of the listed documentation/requirements will be subject to further discussion with the applicants.

### *Ecology*

Policy 1 of the JCS requires the development to both have regard to and protect the biodiversity and ecological interests of the site and contribute to providing a multi-functional green infrastructure network. Policy EN1 of the DMDPD looks for new development sites to safeguard the ecological interests of the site and to contribute to ecological and Biodiversity enhancements.

The Council considers that all developments should take all reasonable opportunities to enhance biodiversity to achieve a net gain for nature. To achieve this the application should adhere to the mitigation hierarchy (providing effective avoidance, minimisation and compensate measures) and deliver biodiversity net gains.

The scope for terrestrial ecological surveys has been previously agreed and surveys of 90% of the route were undertaken between 2020-2021 by suitably qualified and experienced ecologist in line with best practice guidelines. The Council would also encourage the applicant to update the desk top study as our County Wildlife Sites were recently updated.

The cable route has been designed to avoid impacts where possible and further micro-siting is expected at the detailed design. The Council would encourage the applicant to explore further opportunities to avoid/minimise impacts in partnership with other schemes in the area as the schemes develop and are delivered.

The ES provides an outline for mitigation and the Council welcome the use of native species of local provenance and biodegradable tree guards. The proposed mitigation will be reviewed and adjusted as the design progresses. Consideration should be given to the use of moveable 'hedges' which could be placed within hedge gaps at night and removed the following day, to provide for continued connectivity. These have been proposed and will also be trailed by another linear scheme.

Should reptile translocation be required, the translocation site will need to be identified, secured, and maintained for at least the lifetime of the scheme.

The applicant is committed to deliver biodiversity net gain (BNG) and an Initial Biodiversity Net Gain Assessment has been undertaken. At the present time it is anticipated that the scheme will deliver a 0.50% net loss in habitats, and a 3.02% net gain in hedge units. Because it is not possible to offset the loss of habitat units against the gain in hedge units additional work will be required to deliver net habitat gains to ensure the scheme complies with National Planning Policy. With regards to the delivery of BNG we would encourage consideration of the Local Nature Recovery Strategy which should be published by November 2023, and compliance with best practice guidelines to ensure that BNG is delivered post-construction.

Letters of No Impediment (LoNI) have been received from Natural England for bats and badgers and great crested newts will be licenced under the District Level Licensing Scheme. No other licences are anticipated to be required based on the information obtained to date although additional ecological surveys will be undertaken on the remaining 10% of the route to inform the detailed design. In line with best practice Reasonable Avoidance Measures should be employed to minimise impacts on great crested newts and we would encourage the design of a wildlife friendly surface water drainage scheme, with Sustainable Urbans Drainage Systems designed for the benefit of wildlife.

Again, as part of the Council's experience in Discharging Requirements, it is evident that the cabling routes have an impact that South Norfolk need to have regard to for Pink-footed Geese. This impact results from the grazing of the Pink-footed Geese on post-harvest cereal stubs, sugar beet tops etc. A Pink-footed Geese management plan will need to be a requirement of any consent which should set out a clear understanding of their impact and protection needs during the winter months when vegetation removal for the development is most likely to happen.

Overall, following mitigation which will be secured via the DCO, the scheme is predicted to have negligible or minor adverse impacts on ecological receptors i.e. the impacts would have minimal effect at the lower end of the scale, but could adversely affect an ecological receptor but would not adversely affect the integrity or conservation status at the other end. The ES has addressed inter-relationships between ecology, water and air, noise, and vibration.

### Socio-economic and community matters

In general, the District Council is supportive of the project, recognising its importance in relation to the diversification of UK energy supplies; the contribution the projects will make to the achievement of the national renewable energy targets toward net zero; the reduction of the UK's reliance on imported energy and increased energy supply security; and potential contribution to the national and local economy.

The economic benefits in terms of investment and job creation are welcomed.

### Consideration of the draft order

With regards to the Draft Development Consent Order, the Council in general terms does not wish to raise any concerns, however as set out in our Statement of Common Ground and in response to the Examining Authority's questions there are issues and concerns relating to specific requirements/conditions. The Council wishes to reserve its position due to ongoing discussions with the applicant.