

Environment, Development and Transport Committee

Report title:	Norfolk Vanguard Offshore Windfarm Consultation
Date of meeting:	7 September 2018
Responsible Chief Officer:	Tom McCabe - Executive Director, Community and Environmental Services

Strategic impact

The above offshore windfarm and onshore grid connection infrastructure will be determined as a Nationally Significant Infrastructure Project under the Planning Act 2008. Norfolk County Council is a statutory consultee on such projects and therefore has the opportunity to comment and influence the final decision. Responding to such consultations will ensure the County Council's views are formally taken into account prior to a final decision being made by the Secretary of State.

Executive summary

Consultation by the Planning Inspectorate on a proposal by Vattenfall (Swedish Energy Company) for an offshore wind farm 47 km off the Norfolk coast comprising: up to 200 turbines; and onshore supporting infrastructure including: landfall at Happisburgh; buried cable route (60 km); extending the existing substation at Necton; and construction of a new sub-station (close to Necton substation). The proposal has a generating capacity of 1.8 Giga Watts, which is sufficient to provide 1.3 million homes with electricity. Given the scale of the development it is deemed to be a Nationally Significant Infrastructure Project (NSIP) and will be determined by the Secretary of State for Business, Energy and Industrial Strategy.

This is a formal Development Consent Order (DCO) consultation under Section 56 of the Planning Act 2008. This is the final opportunity to make any formal representations on the merits of the proposal prior to the statutory Examination, although the County Council will have an opportunity to submit a Local Impact Report (LIR) under S60 (3) of the Act ahead of the Examination.

Members will be aware that comments on the pre-application version of this project (Section 42) were agreed under delegated chief officer powers in consultation with the Chair and Vice Chair of this Committee and sent to the applicant in November 2017.

While the principle of this proposal is consistent with National Policy on renewable energy there are a number of detailed issues in respect of highway matters; and flood risk management, which will need to be resolved ahead of any final decision on the DCO.

Recommendations:

It is recommended that Members:

- (a) Supports the principle of this offshore renewable energy proposal, which is consistent with national renewable energy targets and objectives, subject to:
 1. The holding highway objection set out in the report being satisfactorily resolved;
 2. The implementation of appropriate highway; historic environment; and surface water conditions / requirements being resolved through the DCO; and
 3. The detailed comments set out in this report and in Appendix 1 being addressed through the DCO process.
- (b) Supports the use of HVDC technology which removes the need for an additional

1. Proposal

- 1.1. This is a DCO application for an offshore windfarm and onshore ancillary grid connection infrastructure in Norfolk, which will be determined by the Secretary of State for Business, Energy and Industrial Strategy. The application is defined as a Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008.
- 1.2. Members will recall that the pre-application version of this proposal was dealt with under delegated chief officer powers in consultation with the Chair and Vice Chair of this Committee in November 2017. The comments sent on behalf of the County Council broadly supported the proposal subject to a number of detailed matters being resolved (see Assessment Section below). Members will also recall that a similar proposal (Hornsea Project Three) was considered by this Committee on 6 July 2018 and supported subject to a number of detailed matters being resolved. Both proposals through their Environmental Impact Assessment (EIAs) have taken into account the cumulative impacts arising from both schemes.
- 1.3. The DCO application is now being handled by the Planning Inspectorate under Section 56 of the above Act. This is the final opportunity to respond to the DCO application ahead of the formal Examination process and a response will facilitate the Council's involvement in the Examination process should this be necessary. The County Council will also, however, be able to submit a Local Impact Assessment (LIR) under S60(3) of the Act ahead of the Examination providing further details and evidence in respect of the application's overall impact on the County Council's function.
- 1.4. The County Council is a statutory consultee and can make comments on the DCO Application and the supporting Environmental Impact Assessment (EIA) / Environmental Statement (ES).
- 1.5. The proposal for the Norfolk Vanguard Wind Farm comprises:

(a) Key Offshore Infrastructure

Location and Distance Offshore	:	Located in two distinct areas approximately 47 and 70 km respectively off the Norfolk coast (see Map 1 (Appendix 2) attached).
Total Site Area	:	592 sq.km. in two separate areas: East 297 sq.km. and West 295 sq.km.
Proposed Capacity	:	Installed capacity of 1.8 Giga-Watt (sufficient to supply 1.3 million households with electricity).
Number and size of turbines	:	Range between 90 x 20 MW to 200 x 9 MW turbines with a maximum tip height of up to 350 m.
Offshore works	:	Interconnector Cables and foundations:
	:	Up to four cables to landfall totalling 400 km (length of export cables).
	:	Up to 2 Offshore electrical (sub-station) platforms; Maximum height 100m; footprint 75 m x 100m;
	:	Up to 2 Offshore Accommodation platforms; Maximum height 100m; footprint 75 m x 100m;

(b) Key Onshore Work

Landfall Location	:	<p>Immediately south of Happisburgh (0.25 km zone identified - see Map 2 (Appendix 3) attached) – all associated infrastructure will be located underground. The offshore cable will come ashore using Horizontal Directional Drilling (HDD) and duct installation under the cliff. Temporary works compound 60 m x 50 m and access track would be needed.</p> <p>Duration 14 – 20 weeks</p>
Cable route		<p>Buried cable route between Happisburgh and grid connection at Necton Substation – approximately 60 km (See Map 3 (Appendix 4) attached).</p> <p>Between 2 – 4 cable trenches (trench width 1-2 m) will be required along an identified 45 m temporary corridor. The corridor width is sufficient to accommodate both the Vanguard and Boreas projects in one duct laying operation.</p> <p>Once both cables installed a 20 m corridor required for permanent easement.</p> <p>Duration 24 months</p>
		<p>The above cable route works would be sufficient to facilitate both the Vanguard and Boreas Projects and forms part of the Vanguard DCO application.</p>
Necton - National Grid Sub-station (Extension)	:	<p>The existing Necton National Grid substation (140 m x 145 m = 20,300) would require an extension to accommodate the Norfolk Vanguard and Norfolk Boreas connection points (see Map 4 (Appendix 5) attached):</p> <ul style="list-style-type: none"> • 340 m x 150 m = 51,000 sq.m.(less the existing operational site 140 m x 150 m = 21,000) = 30,000 sq.m. • Maximum height 15 m. <p>The extension would take the existing sub-station from 20,300 sq.m. to over 50,000 sq.m. (more than doubling the size).</p> <p>Duration 24 – 30 months</p>
<p>Necton - New Sub-station Vanguard Project</p> <p>HVDC Convertor</p>	:	<p>A new onshore substation will be required with a total maximum land requirement for the HVDC convertor station to the perimeter fence of 250m x 300m (75,000 sq.m.);</p> <p>Maximum height of building 19 m (HVDC); Tallest Structure height 25 m – lightening Protection Masts.</p> <p>Plus temporary construction area 200 m x 100 m (20,000 sq.m.) to accommodate offices; car parking; workshops and storage areas;</p> <p>The proposed substation will be located near to the Necton National Grid Substation – see Map attached</p> <p>Duration – 24 -30 months</p>
Overhead Line	:	<p>Two new overhead line towers would be required in</p>

Modifications		<p>close proximity to the existing corner tower (to the north east of the existing Necton substation) with a maximum height of 55m. The existing corner tower would be demolished such that the net new number of towers is one.</p> <p>The above overhead line works would be sufficient to facilitate both the Vanguard and Boreas Projects and forms part of the Vanguard application.</p>
	:	Duration: Construction time approximately 24 - 30 months for sub-station and pylon work (this includes groundworks and civil construction elements).
Ancillary Works (pre-construction works)	:	<p>The onshore work will require, <i>inter alia</i>:</p> <p>Construction compounds – i.e. support buildings private road and hard standing;</p> <p>Construction of temporary haul roads and access tracks along the onshore cable route;</p> <p>Archaeological and ground investigation;</p> <p>Improvements to highway verges;</p> <p>Highway and private access roads;</p> <p>Works to move sewers, drains; and cables;</p> <p>Works affecting non-navigable rivers, streams or water courses;</p> <p>Landscaping and other works to mitigate any adverse effects of the construction; operation, maintenance or decommissioning of the project including ecological monitoring and mitigation works.</p> <p>Duration: 24 months (2020 -2021)</p>
Indicative Construction Programme		
Landfall duct installation	:	2022 - 2023
Pre-construction works	:	2020 - 2021
Cable – duct installation	:	2022 - 2023
Cable – pull	:	2024 - 2025
Substation installation	:	2024 - 2025

2. Evidence

2.1. The principal role of the County Council in responding to the above wind farm proposal, and the onshore infrastructure requirements, will be in respect of the Authority's statutory role as:

- Highways Authority;
- Minerals and Waste Planning Authority;
- Lead Local Flood Authority (LLFA); and

- Public Health responsibilities.
- 2.2. In addition the County Council has an advisory environmental role and economic development function, which also needs to feed into any response made to the above windfarm proposal.
- 2.3. Other statutory consultees include:

Natural England	Highways England
Historic England	Drainage Boards
Marine Management Organisation	Public Health England
Maritime and Coastguard Agency	Energy and utility companies with cable and pipeline interests
Civil Aviation Authority	Parish, District and other County Councils

- 2.4. The remainder of this section of the report assesses the Environmental Statement (ES) and other supporting documentation in respect of the County Council's key functions and sets out the Authority's proposed response / comments. The response largely relates to the onshore infrastructure required to connect the electricity generated to the National Grid. Appendix 1 provides more detailed comments and proposed planning conditions / requirements the County Council would like attaching to any DCO. It should be noted that officers are in continuous contact with the applicants of both offshore windfarms with regard to over-coming any technical issues.

ASSESSMENT of the Environmental Statement (ES)

Overview

- 2.5. The proposal has a maximum installed capacity of 1.8 Giga Watts (1,800 MW) of electricity, sufficient to power approximately 1.3 million households (i.e. this represents more than three times as many dwellings in Norfolk (2011)). Current operational offshore capacity in the UK is just over 4 GW (2015), therefore if consented the Vanguard proposal would potentially increase the UK's installed capacity by 33%.
- 2.6. The proposal will generate thirty times more energy than the Scroby Sands wind farm (60 MW) and more than five and half times more energy than the Sheringham Shoal wind farm (317 MW). As such the proposal would make a significant contribution to the Government's Renewable Energy targets and objectives (see Section 5 below).

Comment

- 2.7. The principle of this offshore renewable energy proposal is supported as it is consistent with national renewable energy targets and objectives, subject to the detailed comments below being satisfactorily resolved with the applicant.

Grid Connection Issues

- 2.8. Since considering the pre-application version of the above proposal, the applicant has now opted to pursue a High Voltage Direct Current (HVDC) solution in respect of its cabling route and grid connection infrastructure. The advantages of using HVDC for transmission purposes is that it:
- (a) removes the need for a HVAC Cable Relay Station (CRS), which would be required near the villages of Ridlington and East Ruston; and
 - (b) narrows the cable width corridor from 100 m to 45 m (with 20 m easement on completion) along the 60 km route.
- 2.9. Grid connection is proposed at Necton and would involve, as indicated above, a

significant extension to the existing sub-station taking it from just over 20,000 sq.m to over 50,000 sq.m. In addition there would be the need for a new HVDC convertor substation for the Vanguard project comprising a further 75,000 sq.m. There would also be a need for up-grading the power lines comprising a new tower. It is recognised that the proposed HVDC convertor station will be more visible structure than a HVAC substation and will stand 4 m higher than a comparable HVAC substation at 19 m.

- 2.10. **Comment** - the County Council welcomes the decision by Vattenfall to pursue a HVDC solution which removes the need for additional onshore infrastructure (cable relay station) in North Norfolk and reduces the potential environmental impact associated with the cable route by narrowing the cable corridor from 100m to 45 m.

Electricity Supply Issues

- 2.11. County Council officers have been in discussion with Vattenfall and other potential offshore windfarm developers regarding the potential for electricity generated from these proposals to be used within the local distribution networks (132 kv and below) i.e. to assist where there are electricity deficits. These discussions have also involved National Grid who have made a formal and legally binding grid connection “offer” to Vattenfall.
- 2.12. National Grid have indicated that the onshore cables from the wind farms will ultimately belong to a future Offshore Transmission Operator (OFTO). In such circumstances, where the main connection point for the OFTO system is at a transmission substation (National Grid), the regulatory arrangements governing OFTO infrastructure do not provide for secondary interconnection between the OFTO system and a local distribution network operator (DNO)(i.e. UK Power Networks). In other words there is no opportunity of “tapping” into the transmission cables and feeding into the local electricity transmission network.

Comments

- 2.13. It is felt that Vattenfall should work with National Grid and UK Power Networks to consider options regarding the potential to feed electricity into the local transmission networks.

In addition the County Council will continue to work with the Local Enterprise Partnership (LEP) through the TRI - Local Energy Strategy (endorsed by this Committee in July 2018), in order to lobby central government to make legislative changes to overcome the obstacles to secondary inter-connection raised above.

Socio-Economic Issues

- 2.14. There are potentially significant economic benefits that may arise from the Vanguard proposal in terms of:
- Local employment creation;
 - Business sectors affected by construction; and
 - Operations and Maintenance (O&M) of the wind turbines.
- 2.15. The ES indicates that the project could create up to 1,063 jobs during construction (463 offshore and 600 onshore) and up to 294 during the operation and maintenance stage (longer term). The ES indicates that “.. there is the potential for major long term benefits to the region due to increased employment across the supply chain serving the offshore wind industry”.
- 2.16. The County Council’s Economic Development team has enjoyed regular, constructive dialogue with many members of the Vattenfall team. The company is engaging with local supply chain companies and seems keen to ensure that

local businesses can benefit as far as possible from a wide range of contracts as they emerge. The company also shares the County Council's ambition to attract new investment into the area, in particular new manufacturing capacity and has been working with County Council's Economic Development Team in a number of areas. The company has an excellent relationship with Gt Yarmouth Port, which hopefully will lead to its use both during the construction phase and later in respect of operations and maintenance (O&M).

- 2.17. It is understood that Vattenfall has signed a Memorandum of Understanding with Peel Ports Great Yarmouth in 2017 to explore locating the Swedish energy group's operations base at the East Anglian facility. Both Vattenfall and Peel Ports expect to finalise their agreement during the summer of 2018. If Vattenfall build both wind farms, they expect to employ up to 150 skilled, local technicians to maintain their projects for a minimum of 25-years.
- 2.18. The County Council is working with all energy companies and the New Anglia LEP to promote this sector and develop a Skills Strategy for the types of skills required for young people in schools and colleges. In addition the County Council would like to see:
- Apprenticeships,
 - Work experience; and
 - Internship opportunities at an appropriate stage.
- 2.19. The County Council is working with Vattenfall to further develop the above Strategy and ensure that there is a skills legacy to the project.

Comments

- 2.20. The County Council should continue to work pro-actively with Vattenfall to demonstrate the economic benefits of using the Port facilities at Great Yarmouth for:
- Construction; assembly and manufacture of windfarm components; and
 - Operations and maintenance.

The County Council should also continue to work with the applicant to develop the creation of apprenticeships; work experience; and internships.

Wider Community Issues and Impact on Business

- 2.21. The applicant has indicated that they are "... committed to exploring options for delivering a provision for communities, with the aim of recognising hosts and accounting for change, where benefits acknowledge and address tangible local change. The form of the benefit and its purpose will be explored with relevant stakeholders at the appropriate time, separate to the Development Consent Order process."
- Such provision could make a valuable contribution to the local area, by supporting projects such as community building improvements and recreation facilities, conservation and wildlife projects etc.
- 2.22. The potential impact and disruption caused to local businesses is most likely to occur during the construction phases. As indicated above the amount of onshore works has been reduced as a result of the Vattenfall committing to transmitting the electricity produced using HVDC technology this avoiding the need for a cable relay station in North Norfolk and reducing the cable corridor width. This will in part reduce the potential impact on businesses in the area.
- 2.23. It is understood that Vattenfall will compensate landowners who are directly affected by the cable route through their land. Compensation is paid for the freehold depreciation of the land affected by the easement and for all reasonable

and substantiated losses arising from construction of the project.

Comment

- 2.24. The County Council welcomes the commitment towards establishing some form of community benefit and would ask Vattenfall to ensure all stakeholders/communities are made aware of such funds and have the opportunity to make appropriate bids.
- 2.25. The reduction in the potential impacts and disruption to business as a consequence of using HVDC technology is welcomed, however, it is felt that Vattenfall should commit to providing appropriate compensation for businesses and communities adversely affected by the construction works.

Commercial Fishing

- 2.26. While commercial fishing is an offshore issue it is considered appropriate to comment on the impacts the above proposal may have on this sector as Norfolk is home to many commercial fishing activities from its numerous ports and landing areas (i.e. potential economic issue).
- 2.27. The ES considers the impact of the proposed windfarm and ancillary infrastructure (offshore cable route; substations; convertor stations and accommodation blocks) on the commercial fishing sector. The type of fishing carried out in the Array area principally comprises:
- Local UK Static gear Fishing potting by UK vessels (i.e. for brown crab, lobster and Whelk);
 - Dutch Vessels undertaking trawling
- 2.28. The impacts arising are most likely during construction leading to temporary loss, or restricted access to fishing grounds and leading to increased steaming times to alternative fishing grounds. However, the ES concludes that the impacts will largely be negligible in the longer term.
- 2.29. The ES also points out that the impact on commercial fishing has been reduced as a consequence of:
- (a) Reducing the number of turbines to a maximum of 200; and
 - (b) Committing to using HVDC technology which uses fewer cable (on the seabed) thus reducing potential snagging issues of fishing gear.
- 2.30. In terms of mitigation and minimising impact, the applicant has indicated that they will, include, for example:
- The provision of timely notices to mariners and the fishing community on any proposed works;
 - Undertaking appropriate liaison with all relevant fishing interests; and
 - Ensuring the layout of the windfarm minimises any future disruption to fishing in the area.

Comment

- 2.31. The County welcomes the revised/amended design of the above proposal and mitigation measures set out in the applicant's ES. However, where there is likely to be a demonstrable impact (i.e. during: construction; operation and/or decommissioning) on commercial fishing affecting communities in Norfolk, it is considered that Vattenfall should provide appropriate compensation (i.e. disturbance payments) to those fishing businesses affected. It is understood that Vattenfall are prepared to provide compensation in appropriate circumstances.

Local Highway - key Issues

- 2.32. Detailed discussions and negotiations will remain on-going throughout the application process particularly in respect of any temporary road closures;

construction traffic management plans; and other travel related planning. Notwithstanding these ongoing discussions officers have assessed the traffic implications arising from all of the following:- the landfall area; onshore cable corridor; connection to the National Grid; compounds; storage areas; and construction accesses – as used by (and / or affected by) construction; operational and decommissioning traffic.

- 2.33. The key issue for the County Council as Highway Authority is in relation to the proposed use of the former Oulton Airfield as the main work compound. The main compound for the project is located on the former Oulton Airfield and seeks to utilise an access and HGV route which the Planning Inspectorate identified in 2014 as being unsuitable for HGV's to use (PINS Appeal ref – APP/K2610/A/14/2212257).

Local Highway Comment

- 2.34. It is felt that the applicant needs to find a different site for their main compound. However, if they wish to pursue their chosen site then they will need to:
- (i) provide a scheme of permanent off-site highway improvement works comprising carriageway widening along the entire route from the compound to the main road; and
 - (ii) demonstrate that such a scheme is capable of overcoming the issues previously identified by PINS.

In the meantime it is felt that a **holding objection** on highway safety grounds should be raised to the inclusion of this site.

- 2.35. At the time of writing this report the County Council's highway officers are still carefully assessing the supporting documentation in respect of the above matters and will make appropriate comments under delegated officer powers and feed these back to the Planning Inspectorate within the prescribed consultation period. This may include, where appropriate:
- (a) Raising any necessary holding highway objection in the event that highway safety is deemed to be compromised; and/or
 - (b) Seeking Planning Conditions (Requirements) to be attached to the DCO in order to overcome any highway issue.

Wider Strategic Highway Issues

- 2.36. An onshore substation will be required. The intention is to extend the Necton substation in an east west direction with vehicular access provided from the A47(T). Traffic assessments for the A47(T) are issues for Highways England to comment upon and not the County Council. Nevertheless the County Council has expressed concern with regard to the proposed access arrangements and has suggested that as a minimum, a full right turn lane be provided from the A47(T). An alternative access strategy from the A47(T) has also been proposed by the applicant, however the County Council has again raised safety concerns. Ultimately, access to the A47(T) for the proposed new substation is a matter for Highways England to assess and the County Council can only inform them of our concerns.
- 2.37. Members will be aware of proposals to dual the A47(T) between Easton and North Tuddenham. Highways England have announced a preferred route for the A47(T). Proposals for the dualling of the A47 (T) will follow the same NSIP procedures as the above application. It is understood that formal pre-application work on the A47 dualling will commence later in the year. While there are no immediate plans to dual the A47(T) in the Necton area, it is felt that the above proposal should not fetter any long terms possibilities for the dualling of the A47 in the area.

- 2.38. The applicant will need to liaise with both Highways England and Norfolk County Council (as LHA) to ensure that the planned cable route does not fetter any future major road plans in the area and cause additional costs and/or delay to such road schemes.

Strategic Highways Comments

- 2.39. (a) Vattenfall need to satisfy Highways England with regard to the safety of their proposed access at Necton onto the A47(T). Impact upon driver delay along the trunk road network will also be assessed by Highways England.
- (b) Vattenfall should work closely with Highways England and Norfolk County Council (Highway Authority) to ensure the proposed cable route does not fetter any future plans for the dualling of the A47(T);
- (c) Vattenfall are asked to ensure that their underground Cable Route does not fetter any future highway improvement schemes in Norfolk and that where any reinforcement or diversion is needed to the cable route as a result of such highway works, that Vattenfall will be responsible for any upgrades or diversion of the cables and will fully meet the costs of these works.

Minerals and Waste

- 2.40. Norfolk County Council in its capacity as the Minerals and Waste Planning Authority has been involved in discussions with the applicant; regarding mineral and waste safeguarding, both of sites and resources. Throughout the project preparation information has been exchanged between the parties regarding these safeguarding issues.
- 2.41. The Mineral Planning Authority considers that Chapter 19 of the Environmental Statement correctly assesses the magnitude, sensitivity and significance of the effect of the project on Mineral Safeguarding Areas. The further mitigation suggested, in the ES is considered likely to be effective. The Outline Construction Code of Practice, which will form part of the DCO requirements, states that a Site and Excavated Waste Management Plan will be drawn up, and that this will set out how material from excavations will be reused and recycled, where practicable.

Comment

- 2.42. Norfolk County Council in its capacity as the Minerals and Waste Planning Authority does not object to the Proposed Vanguard Wind Power Project provided that the applicant continues to work with Norfolk County Council regarding the mitigation of impacts on the Mineral Safeguarding Areas.

Flood and Drainage Issues and Comments

- 2.43. The applicant has provided supporting documents for the DCO application addressing local flood risk issues and surface water drainage issues. Chapter 20 of the ES (Water Recourses and Flood Risk) considers the potential impacts of the proposal on water resources and flood risk. The chapter includes a flood risk assessment and provides an overview of the existing baseline where the onshore project area is proposed, followed by an assessment of the potential impacts and associated mitigation for the construction, operation and decommissioning of the project. The assessment also considers cumulative impacts of other proposed projects. This chapter has been considered in

conjunction with Chapter 19 of the ES (Ground Conditions and Contamination).

- 2.44. The ES identifies two key groups of impacts for the purpose of defining impact significance:
- Water resources, (these are potential effects on the physical (including hydrology and geomorphology), biological or chemical character of surface waters or groundwater, potentially impacting on secondary receptors such as wetlands or abstractions, and Water Framework Directive water body status); and
 - Flood risk (these are the potential impacts of the project on site drainage, conveyance and surface water flooding). The potential for cumulative effects has been considered for the construction, operation and decommissioning of the onshore project area cumulatively with the offshore project area as well as with other onshore projects.

Comment

- 2.45. The LLFA welcomes that sustainable drainage systems (SuDS) have been proposed for the project where permanent above ground infrastructure is proposed to mitigate against additional impermeable surfaces creating an additional risk of flooding. The LLFA have considered the submitted documents and are pleased to see that strategies have been supplied for the sub-station and the National Grid sub-station extension study areas. The cable corridor has not been considered in the post construction drainage strategy due to the fact that the cable would be below ground and reinstatement to pre development state would mitigate the potential for increased runoff.
- 2.46. It is noted that Greenfield run-off rates and volumes have as yet to be agreed with the LLFA. This will need to be considered during detailed design stage.
- 2.47. It should be noted that where ordinary watercourses are to be crossed by open cut, or any other temporary works are proposed as part of this project are likely to affect flows in an ordinary watercourse, then the applicant would need the approval of Norfolk County Council. The County Council would appreciate early consultation on the number of such crossings of Ordinary Watercourses and the required timeframes for approval. This will enable the team to have adequate staffing resources in place to ensure approvals are not unduly delayed and for and issues to be identified. It should also be noted that other ordinary watercourse crossings would need consent approval from the relevant Internal Drainage Board (IDB). In line with good practice, Norfolk County Council seeks to avoid culverting, and its consent for such works will not normally be granted except as a means of access. Such approvals are separate from planning and temporary mitigation methods may be required while cable laying is undertaken.
- 2.48. Norfolk County Council appreciates that these are initial drainage proposals, however, ideally these matters above (covering infiltration testing and drainage design) should be clarified prior to determination, to ensure that the site has a deliverable surface water drainage strategy. In particular there is no maintenance or management strategy supplied with the application and the LLFA have had to assume that the applicant will take responsibility for maintaining the drainage for the lifetime of development. The LLFA recognise this is a strategic application and is being determined by the Secretary of State as the Planning Authority and to ensure the best possible drainage strategy is developed Norfolk County Council would ask that the attached condition / requirement (see Appendix 1) is integrated into any final DCO consent. Additional technical LLFA will be sent under delegated officer powers to the Planning Inspectorate along with the above comments.

Landscape

- 2.49. County Council officers have attended an Expert Topic Group led by the applicant relating to Landscape and Visual Impact Assessment (LVIA) work.
- 2.50. It is noted that the LVIA has been conducted using the Guidelines for Landscape and Visual Impact Assessment (GLVIA) 3rd Edition and other industry best practice guidance. The visualisations; photomontages; and 3D model views are useful in viewing the likely effects of the proposed development and change over time. When viewed in conjunction with the ZTVs (Zone of Theoretical Visibility) photomontages, these give a clear demonstration of the impacts of the Substation and the National Grid Substation Extension, as well enabling an assessment of the mitigation landscaping.

Comment

- 2.51. It should be noted that landscape issues are ultimately a matter for Breckland District Council to comment on as the Local Planning Authority with their own adopted Local Plan policies covering landscape and other environmental matters.
- 2.52. While it is accepted that the onshore elements of Norfolk Vanguard have the potential to impact the landscape and visual amenity, measures have been “designed-in” to minimise these impacts. It is also noted that the location chosen has been selected to minimise visual impact, particularly in relation to the Substation and the National Grid Substation Extension, where existing vegetation and landform have been used to intercept views.
- 2.53. The decision by Vattenfall to pursue a HVDC option in terms of its cable route has, as indicated above, taken away the need for a cable relay station / booster station close to the Norfolk Coast (near Happisburgh). This option is welcomed in terms of minimising the impacts of this development on the landscape in North Norfolk.

Public Health

- 2.54. The County Council would expect detailed matters relating to, for example construction noise; local environmental health; and any other potential contamination issue, to be addressed by the relevant District Councils and/or other statutory body such the Environment Agency. Providing the District Councils are satisfied with the proposal in relation to the above matters, the County Council would not wish to raise any public health concerns at this time.

Discharge of Requirements

- 2.55. As part of the application process there will be a need for a series of planning conditions attached to the final consent (Development Consent Order) covering a range of detailed matters. In the event that the DCO is consented these planning conditions, known as “requirements”, will ultimately need to be discharged as the development progresses. The discharge of conditions is normally undertaken by the determining authority (i.e. local planning authority - LPAs) for non-NSIP schemes. For NSIP schemes there is the potential for the discharge of conditions/requirements to be undertaken by either the District Councils (LPAs) and/or the County Council.

Comment

- 2.56. There are ongoing discussions with the applicant and the District Councils affected by this scheme as to how best the discharge of requirements should be

undertaken. One option might be that there is a single “lead” Authority discharging the requirements. An alternative option would be that each local authority discharge those requirements within their respective area / statutory remit. It is understood that the applicant is prepared to fund the above “discharging” work given the significant resource implication.

Local Member Views

- 2.57. Local Member comments will be reported orally at Committee.

3. Financial Implications

- 3.1. Staff have engaged with the applicant at the technical scoping stage; attending steering group and topic based meetings and provided technical advice and information in respect of the County Council’s statutory responsibilities. The County Council has charged for some of this advice and technical data provided.

4. Issues, risks and innovation

- 4.1. The County Council is a statutory consultee on any Nationally Significant Infrastructure Project determined by the Secretary of State within Norfolk or on the borders with Norfolk. The County Council will also be invited to submit a Local Impact Report (LIR), the content of which is a matter for the Local Authority and can include local transport issues and the local area characteristics.
- 4.2. The Council’s Planning functions are subject to equality impact assessments. No EqIA issues have been identified at this stage.
- 4.3. The County Council’s internal procedures allow for corporate response/s to be made to NSIP consultations ensuring all the County Council’s statutory responsibilities are taken into account.

5. Background

- 5.1. At a national level the key energy objectives are:

- Reducing greenhouse gases (carbon reduction);
- Providing energy security; and
- Maximising economic opportunities.

In order to meet these objectives more infrastructure is required with an increased emphasis on energy generation from renewable and low carbon sources.

- 5.2. The government’s long term aspiration is to increase the diversity of the electricity mix, thereby improving the reliability of energy supplies as well as lowering carbon emissions. The Government is committed to the following targets by 2030:

- A 40% cut in greenhouse gas emissions compared to 1990 levels;
- At least a 27% share of renewable energy consumption; and
- At least 27% improvement in energy efficiency.

- 5.3. The Energy Act 2013 includes provision intended to incentivise investment in low carbon electricity generation, ensure security of supply and help the UK meet its emissions reduction and renewable energy targets. The Climate Change Act 2008 underlines the government’s commitment to addressing both the causes and consequences of climate change. The Act aims to improve carbon management and help the transition towards a low carbon economy in the UK. The Planning Act 2008 also makes specific reference to the need for local authorities to tackle climate change.

5.4. In terms of planning, the UK's commitment to renewable energy has been captured in the following National Policy Statements (NPSs):

- Overarching NPS for Energy (NPS EN 1);
- NPS for Renewable Energy Infrastructure (NPS EN 3);
- NPS for Electricity Networks Infrastructure (NPS EN 5).

The Planning Act 2008 requires the Secretary of State to have regard to the relevant NPSs when making their decision.

5.5. With regard to local planning issues the National Planning Policy Framework (NPPF 2018) indicates that the planning system has a key role in supporting the delivery of renewable and low carbon energy and associated infrastructure. To help increase the use and supply of renewable energy the NPPF (section 14) indicates, inter alia, that local planning authorities (LPAs) should:

- provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);
- consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and
- identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.

5.6. As the above proposal is a NSIP it will be the Secretary of State (SoS) rather than the respective LPAs who will determine the application. The SoS will need to have regard to Local Plan policies and allocations when determining the application. The individual LPAs, including the County Council, are also statutory consultees in the NSIP process and will respond having regard to their Local Plan policies and other statutory responsibilities including environmental health (District Councils).

Background Papers

The National Planning Policy Framework (2018)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf

The Planning Act (2008)

<http://www.legislation.gov.uk/ukpga/2008/29/contents>

The National Planning Policy Framework (2012) -

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

Energy Act (2013)

<http://www.legislation.gov.uk/ukpga/2013/32/contents/enacted/data.htm>

Norfolk Vanguard Proposal (2018) – Planning Inspectorate web-site:-

<https://infrastructure.planninginspectorate.gov.uk/projects/eastern/norfolk-vanguard/?ipcsection=docs&stage=app>

Officer Contact

If you have any questions about matters contained in this paper or want to see copies of any assessments, eg equality impact assessment, please get in touch with:

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