

**NORTH NORFOLK DISTRICT COUNCIL**  
HOLT ROAD CROMER NORFOLK NR27 9EN  
Telephone 01263 513811  
www.northnorfolk.org  
e-mail planning@north-norfolk.gov.uk



My Ref: NNDC/HP3/140917  
Date 20 September 2017

Contact: Mr G Lyon

Stuart Livesey  
Project Development Manager  
Hornsea Project Three Offshore Wind Farm  
DONG Energy,  
5 Howick Place  
London.  
SW1P 1WG

Sent by email

Dear Mr Livesey

**Hornsea Project Three Offshore Wind Farm  
Statutory Consultation under Section 42 of the Planning Act 2008 and Regulation 11 of  
Infrastructure Planning (Environmental Impact Assessment) Regulations 2009**

Thank you for your letter dated 27 July 2017 inviting North Norfolk District Council (NNDC), as statutory consultee, to comment on the proposed Hornsea Project Three wind farm development as set out in the Preliminary Environmental Information Report (PEIR) and supporting consultation materials placed on DONG Energy's website dated July 2017.

This letter should be considered as the formal position of North Norfolk District Council at this time in relation to the PEIR report and these comments are given without prejudice to future consideration by the Council as the project develops.

In setting out the Council's position a report was produced for discussion by the Council's Cabinet. [A copy of the Cabinet report and draft minutes are attached with this letter.](#)

Cabinet resolved on 05 September 2017 to:

- 1) **Endorse the content of the report as being the Council's formal position and response to the current round of consultation being undertaken in respect of DONG Energy's Hornsea Project Three offshore windfarm development, and**
- 2) **Re-state the Council's ongoing commitment to discuss and negotiate with DONG Energy to achieve the best outcome for North Norfolk from this major development proposal.**
- 3) **Seek advice regarding potential health implications to the local community.**
- 4) **Request that DONG Energy further explore Direct Current transmission arrangements as the proposed development is refined in the coming months**

Cont/...

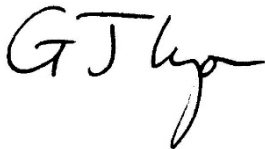
Cont/...

In respect of point 3) above and potential health implications, concerns were expressed that the proposal would involve the laying of cables carrying very high voltages across large areas of the District and, in respect of those cables, questions were asked whether the health implications associated with electromagnetic fields (EMF) along the intended cable route had been fully explored and were understood. The District Council would therefore request assurance from DONG Energy, through submission of appropriate technical reports, that the cables being laid (whether HVAC or HVDC) would not give rise to health risks to nearby residents or other sensitive receptors from EMF or from other effects associated with the transmission of high voltage electricity along buried cables.

In respect of point 4) whilst the District Council recognises that DONG Energy may need at this stage to assess the potential of both HVDC and HVAC transmission systems, the District Council is aware from public comments made through the current public consultation processes in respect of the Hornsea Project Three and other major offshore wind proposals seeking landfall and connections into the National Grid in Norfolk that the public have a strong preference to see HVDC transmission systems adopted. The Council understands that this is because HVDC technology would remove the need for onshore and offshore booster stations to be provided along the route of the export cables between the turbine field and the connection into the National Grid infrastructure, thereby minimising the impact of these developments on communities in North Norfolk once the construction of any cable corridor works were complete. The District Council has therefore prepared its comments on the PIER report based upon the potential of an HVAC transmission system being deployed, but would ask that DONG Energy continue to appraise both options in the hope that the less intrusive HVDC option might be chosen in the final scheme design. Without prejudice to the comments made above, the District Council is carefully following the debate which is taking place over the use by offshore wind development companies of HVAC and HVDC systems and reserves its position in respect of publically lobbying the Government to better understand the difference between the two transmission systems so that the least environmentally damaging option might be taken forward on this and other schemes

Notwithstanding the position outlined above, the District Council values the relationship which has been established with the DONG Energy team in the development of the Hornsea Project Three project proposal over the past 18 months and looks forward to continued dialogue with you in the coming months as the project proposals are refined so as to achieve the best possible outcome for communities in North Norfolk if the proposal receives Development Consent approval through NSIP and the Secretary of State.

Yours sincerely

A handwritten signature in black ink, appearing to read 'G Lyon', written in a cursive style.

**Geoff Lyon** (MTCP, MRTPI)  
Major Projects Manager

## **CABINET**

**Minutes of the meeting of the Cabinet held on Monday 05 September 2017 at the Council Offices, Holt Road, Cromer at 10.00am**

**Members Present:**

Mrs S Arnold	Mr W Northam
Mrs A Claussen-Reynolds	Mrs J Oliver
Mr N Dixon	Miss B Palmer
Mr T FitzPatrick(Chairman)	Mr R Price
Mr J Lee	Ms M Prior

**Also attending:**

Mrs S Butikofer	Mr N Smith
Mrs G Perry-Warnes	Mr R Shepherd
Mr B Smith	Ms K Ward
Mr N Pearce	Mr J Rest
Mr R Reynolds	Mrs A Fitch-Tillett

**Officers in Attendance:**

The Corporate Directors, the Monitoring Officer, the Head of Finance and Asset Management, the Chief Technical Accountant, the Policy & Performance Management Officer, the Major Projects Manager, the Health and Communities Team Leader, the Democratic Services Manager and the Democratic Services Officer.

**Also in Attendance:** David Bale, Eastern Daily Press and Mike Liggins, BBC Look East

**Public Speakers:**

For Agenda Item 12: Hornsea Project Three Offshore Wind Development

Mr William Horabin (on behalf of the Friends of North Norfolk), Katie Taylor, Ray Pearce, Beverley Wigg and Peter Solomon.

For Agenda Item 14 Itteringham Community Shop

Mrs Paddy Seligman and Mr Nigel Clifford.

The meeting was chaired by the Leader who welcomed the press, media and members of the public. He informed Members that the press and BBC wished to record the proceedings and that he had agreed to this. Because the press, BBC and public were present for items 12 (Hornsea Project Three Offshore Wind Development) and 14 (Itteringham Community Shop), they would be taken earlier in the meeting, rather than in the order in which they appeared on the agenda.

**34. APOLOGIES FOR ABSENCE**

None

### 35. MINUTES

The minutes of the meeting held on 03 July 2017 were approved as a correct record and signed by the Chairman.

### 36. PUBLIC QUESTIONS

Public questions were received on items 12 (Hornsea Project Three Offshore Wind Development) and 14 (Itteringham Community Shop).

The Corporate Director (SB) responded to questions on Hornsea Project Three Offshore Wind Development:

- a) The Council's proposed response to the Section 48 consultation on DONG Energy's proposed Hornsea Project Three offshore wind development at item 12 of the agenda had been made on the basis of DONG Energy being made a grid connection offer from National Grid at Norwich Main. Separate to the DONG Energy Hornsea Project Three proposal, another company, Vattenfall, had been offered a grid connection for their proposed Norfolk Vanguard and Boreas developments at Necton, meaning that the two onshore cable routes would cross each other near to Reepham. This gave the impression to the public that the schemes were not co-ordinated.
- b) Recognising these concerns the Leader of the Council had written to the Secretary of State for Business, Energy and Industrial Strategy in November of 2016 asking that the Government took a more strategic approach to facilitating connections of new offshore wind generation into the National Grid infrastructure.
- c) This correspondence had resulted in a meeting between the Leader and Corporate Director (SB) with a senior official at National Grid in March of this year, when it was explained that there was little opportunity for National Grid infrastructure to be extended into North Norfolk so as to provide a more co-ordinated connection for the Hornsea Project Three and Norfolk Vanguard and Boreas schemes into the National Grid. This was because any proposals to extend overhead pylons and power cables would be expected to meet with significant public opposition and planning / public inquiry processes which would create significant uncertainty for the offshore wind companies.
- d) The Leader of the Council had informed the official from National Grid of the somewhat perverse situation which the District faced in seeing large volumes of new electricity generated from offshore wind developments crossing the district, whilst at the same time there were constraints in the capacity of the local electricity distribution networks serving the east of the North Norfolk District which was limiting economic and housing growth. The National Grid official he advised that he recognised the Council's frustration in this regard, but that it would be necessary for the Council to take up these concerns with the local network distribution operator UK Power Networks.
- e) To date the District Council had been supportive of the principle of offshore wind developments and the earlier Sheringham Shoal and Dudgeon schemes had had no long-term negative impact on the District from the laying of the onshore cables. Further the Operations and Maintenance facilities in support of the Sheringham Shoal development had created up to 100 new jobs at Egmere and Wells-next-the-Sea. However, the developments now proposed would involve lasting impacts on the local landscape through the development of booster or relay stations, potentially involved extended or protracted construction programmes and offer few, if any, wider or long term benefits to the area through additional jobs etc. In this respect the Council was concerned that local communities in North Norfolk would potentially experience significant disruption /

inconvenience through the schemes without any of the benefits of such developments.

- f) In terms of landscape and cumulative impact, the Council view was that the Hornsea Project Three scheme would have a generally benign long-term impact on the District except for the proposed booster station, although the site identified for this installation was the least harmful of the three sites considered and officers felt that this facility could be contained with the landscape through sensitive siting and screening
- g) In terms of potential health implications of electro-magnetic fields: the Corporate Director (SB) suggested that the Council should seek further advice on this. However, health implications of underground cables were not proven and there was a duty on the District Council to appraise the outlined options.
- h) Impact on communities: the Council would further lobby the Government in respect of compensation payment awards.

**37. ITEMS OF URGENT BUSINESS**

None

**38. DECLARATIONS OF INTEREST**

None

**39. MEMBERS QUESTIONS**

The Leader confirmed that Members could ask questions as each item arose.

**40. CONSIDERATION OF ANY MATTER REFERRED TO THE CABINET BY THE OVERVIEW AND SCRUTINY COMMITTEE OR COUNCIL FOR RECONSIDERATION**

None

**41. CONSIDERATION OF REPORTS FROM THE OVERVIEW AND SCRUTINY COMMITTEE**

None

**42. PLANNING POLICY AND BUILT HERITAGE WORKING PARTY**

This item was introduced by the Portfolio Holder, Mrs S Arnold, who asked that the fishing industry should be included in the document.

**RESOLVED**

**1. Agenda Item 7: Norfolk Strategic Framework Consultation:**

That the Council submits the comments in Table 1 of this report as its response to the consultation.

**2. Agenda Item 8: Planning for Health Protocol**

That the Council approves the Planning for Health Protocol

**43. BUDGET MONITORING REPORT 2017/18 – PERIOD 4**

The report was introduced by the portfolio holder, Mr W Northam. It summarised the budget monitoring position for the revenue account and capital programme to the end of July 2017. The overall position at the end of July 2017 showed an under spend of £857,491 to date for the current financial year on the revenue account, this was currently expected to deliver a full year under spend of £91,185. It was an achievement to be able to forecast an underspend and thanks were due to our finance officers.

It was proposed by Mr Northam, seconded by Mr T FitzPatrick and

#### **RESOLVED**

- 1. Cabinet note the contents of the report and the current budget monitoring position;**
- 2. Recommend the release of £45,000 from previously identified Digital Transformation Funding to enable the extension of the Business Process review team leader.**

#### **44. MANAGING PERFORMANCE Q1 2017/18**

The report was presented by the Leader.

The majority of the 71 activities were on track or ahead of plan (58) and four activities had been completed successfully. Six activities were having some problems, one needed attention/was off track, one activity was on hold and one had not started. The 71 activities reported on included 63 from the Annual Action Plan 2017/18 and eight activities from the Annual Action Plan 2016/17 that were not completed last year. Performance was being closely monitored, particularly for the activities where issues or problems had been identified (seven).

Work was being done on streamlining the report and improving the way information was presented.

It was proposed by Mr T FitzPatrick, seconded by Miss B Palmer and

#### **RESOLVED**

- 1. That Cabinet notes this report, welcomes the progress being made and endorses the actions laid out in Appendix 1 being taken by management where there are areas of concern.**
- 2. That Cabinet approve the removal of the Economic Growth performance indicators J 023 and J 024 for the reasons given in Section 2 of this report.**

#### **45. HORNSEA PROJECT THREE OFFSHORE WIND DEVELOPMENT**

The report was presented by the portfolio holder, Mrs S Arnold, who thanked officers for a full and excellent report. She also thanked the members of the public for their contributions. She proposed two additions to the recommendation:

- 1. Seek advice regarding potential health implications of underground cables on the local community.**
- 2. Lobby the Government for clarity over its position on whether offshore wind developments should adopt the High Voltage Direct Current transmission system**

rather than High Voltage Alternating Current system, the latter of which requires the provision of offshore and onshore booster or relay stations.

She also suggested that the Government should be lobbied so that any Contract for Difference awards should allow developments to be built out in a single phase so as to minimise the impact of cable corridor engineering works on local communities

Mr N Dixon seconded the proposal. He commended the public speakers for raising points that the Council would want to pursue, especially as there would be further projects at a later date. The present scheme was positive and the Council's response was very measured.

#### Discussion:

- a) Mr R Price endorsed the report. He said that National Grid was a profit-making company and a way should be found to bring the infrastructure further into North Norfolk.
- b) Mrs G Perry-Warnes agreed that the Direct Current option needed to be explored as it was more environmentally friendly. She asked that access proposals should be announced in advance and that disruption to local communities should be compensated.
- c) The Corporate Director (SB) explained that the recommendation concerned how the Council should respond to this Section 48 consultation on the Preliminary Environmental Impact Report for the DONG Energy Hornsea Project Three proposal. There would be further opportunities for the Council to comment on the detail of the proposal in the 2<sup>nd</sup> quarter of 2018 when the Development Consent Order application would be submitted. DONG Energy had considered 3 sites for the onshore booster station facility and the proposed location was the most southerly site and officers believed it would have least impact on the District. The Council should lobby government harder regarding mitigation of disruption to local communities. It was custom and practice for offshore wind developers to set up and operate a community fund in the long term and the Council should indicate that it would have such expectations around the schemes now being proposed in the district. However the Council should not compromise itself in the short-term, in terms of scrutiny of the proposals, on the basis that there could be community funds available to the area in the future..
- d) Mrs S Butikofer welcomed the additions proposed by the portfolio holder but didn't feel that the recommendation was sufficiently robust, particularly regarding impact on coastal villages. She urged that local businesses should be compensated and informed Members that Norman Lamb MP had made contact with the Government on the matter. She was assured by the Corporate Director (SB) that the Council recognised, and was mindful of, the impact on local communities. Mr D Young, a local Member, had suggested that the route through Kelling might have less impact. The provisional impact assessment was looking at all 3 routes. The Council would seek to minimise the impact.
- e) In response to a question from Mrs Butikofer regarding the impact of construction traffic, the Corporate Director (SB) explained that a construction access management plan would be agreed with Norfolk County Council. NNDC would suggest evening movements of Heavy Goods Vehicles accessing the site and a different route to that previously used in the delivery of the Dudgeon cable route, although options were limited in the Weybourne area.
- f) Mr J Lee expressed appreciation that the impact on the fishing industry had been considered by the report. Offshore developments were generally built on fishing grounds.
- g) Ms K Ward supported further investigation of the Direct Current option.

- h) The Corporate Director (SB) informed Members that a similar report would be made in October or November when Vattenfall submitted their proposals for the Norfolk Vanguard scheme.

It was proposed by Mrs S Arnold, seconded by Mr N Dixon and

**RESOLVED to**

- **Endorse the content of this report as being the Council's formal position and response to the current round of consultation being undertaken in respect of DONG Energy's Hornsea Project Three offshore windfarm development, and**
- **Re-state the Council's ongoing commitment to discuss and negotiate with DONG Energy to achieve the best outcome for North Norfolk from this major development proposal.**
- **Seek advice regarding potential health implications to the local community.**
- **Further explore the Direct Current option.**

**46. RESPONSE TO NORTH NORFOLK CONSULTATION – CABINET REPORT**

The report was introduced by the portfolio holder, Ms M Prior. She thanked the Health and Communities Team Leader for much background work.

The purpose of the report was to provide a response from North Norfolk District Council (NNDC) to the public consultation and engagement document published by North Norfolk Clinical Commissioning Group (NNCCG) in respect of Benjamin Court Healthcare Unit. The proposed changes to the Benjamin Court Healthcare Unit would increase specialist inpatient and outpatient services at Benjamin Court. This would benefit residents across North Norfolk. However, the consultation covered all 4 areas in North Norfolk (Kelling Hospital, North Walsham Memorial Hospital, Benjamin Court and Cranmer House) and NNDC would be keeping a watching brief on them all.

The process was ongoing before a final decision was reached. Overall the proposals were supported although further information had been requested and confirmation sought on a number of identified issues.

Mr J Lee seconded the recommendation saying that it was vital to have these services in North Norfolk, with its aging population.

Mr R Reynolds supported the recommendation. He said that Cranmer House was important to Fakenham and he was pleased with the statement that it would not close.

It was proposed by Ms M Prior, seconded by Mr J Lee and

**RESOLVED**

**To approve the response to the consultation document and to ask NNCCG to formally respond to the questions raised in the response.**

**47. ITTERINGHAM COMMUNITY SHOP**

It was reported that, as well as the two public speakers, there had also been a letter of support from a member of the public.



The report was introduced by the portfolio holder, Mrs J Oliver, who proposed the recommendation. She explained that the shop has been in the premises since 1637 and, since 1994, it had been run by the Itteringham Community Association (“the ICA”). More than 20 volunteers from the village were involved. The shop provided an asset which was greatly valued by the community and visitors.

The owners of the shop and house had served notice on the ICA to terminate the lease and the notice was due to expire on 8th October 2017. The parties were currently in dispute in relation to the notice. The shop had also been listed as an Asset of Community Value and this was under appeal by the current owners, who had indicated a willingness to sell Fair Meadow House and the shop. The ICA had commenced fundraising but were unlikely to be able to raise the purchase price for the shop, given the restricted timescales. There had been a significant amount of press coverage, both locally and nationally and it was clear from visiting the village and the large number of “Save Our Shop” posters displayed by homes there, that this was an important issue for Itteringham and the surrounding villages.

The purchase of the community shop and house would represent a prudent investment for the District Council in line with the Council’s Asset Commercialisation Strategy and would maintain the viability of an important community asset. Fairmeadow House was an attractive building in an attractive village and would be suitable for residential and holiday use.

The recommendation was seconded by Mrs A Claussen-Reynolds, who had been responsible for bringing the issue to Cabinet. She told Members that the shop was a lifeline to the community.

Mr N Dixon commended the proposal, saying that the shop was an asset of community value. It was incumbent on the Council to consider if such assets – when at risk – could be maintained. Purchase of the shop would be an example of how the Council could respond to other needs in the future.

Ms K Ward supported the proposal and said that it was important that the Council should be financially sustainable. However, as Chair of Scrutiny, she was concerned about the process and the lack of time for Members to read papers. She spoke of Member concern regarding the underlying policy and the choice of this project above others. The Leader said that the policy had previously been discussed by the Overview and Scrutiny Committee but could be re-visited. The portfolio holder observed that the papers had been published on 24 August 2017 and no Members had contacted her about them.

The Head of Legal and Democratic Services explained to Members that, because the notice was due to expire on 8th October 2017, the matter was urgent. She asked Members to nominate the decision as urgent in accordance with Standing Order 8.13 (a) and (c). This would prevent a call-in which would delay the purchase of the property beyond the date of expiry of the notice.

Mr N Smith said that Itteringham was an isolated village with elderly residents. The shop was an invaluable asset to them. The project would be using Council money to help the community and generate income. Mrs G Perry-Warnes, who asked not to be filmed, supported this. It was a function of the Council to listen to local communities and support their aims. She thanked the Corporate Director (SB) and the Head of Legal and Democratic Services for their work and commended Members to support the project. The Leader informed Members that there had also been a significant amount of work on the project by Cabinet.

It was proposed by Mrs J Oliver, seconded by Mrs A Claussen-Reynolds and

**RESOLVED**

1. That Cabinet agree the purchase of Fair Meadow House and Community Shop on the terms set out in Appendix A to be funded through the Asset Management Reserve.
2. That the decision is deemed urgent in accordance with Standing Order 8.13 (a) and (c)

The meeting ended at 11.45 am

\_\_\_\_\_  
Chairman

DRAFT

# Cabinet




**Please Contact:** Emma Denny

**Please email:** [emma.denny@north-norfolk.gov.uk](mailto:emma.denny@north-norfolk.gov.uk)

**Please Direct Dial on:** 01263 516010

24<sup>th</sup> August 2017

A meeting of the **Cabinet** of North Norfolk District Council will be held in the Council Chamber at the Council Offices, Holt Road, Cromer on **Tuesday 05 September 2017 at 10.00am**

  
**Please note change of day**

At the discretion of the Chairman, a short break will be taken after the meeting has been running for approximately one and a half hours

Members of the public who wish to ask a question or speak on an agenda item are requested to arrive at least 15 minutes before the start of the meeting. It will not always be possible to accommodate requests after that time. This is to allow time for the Committee Chair to rearrange the order of items on the agenda for the convenience of members of the public. Further information on the procedure for public speaking can be obtained from Democratic Services, Tel: 01263 516010, Email: [democraticservices@north-norfolk.gov.uk](mailto:democraticservices@north-norfolk.gov.uk)

Anyone attending this meeting may take photographs, film or audio-record the proceedings and report on the meeting. Anyone wishing to do so should inform the Chairman. If you are a member of the public and you wish to speak on an item on the agenda, please be aware that you may be filmed or photographed.

**Emma Denny**  
**Democratic Services Manager**

To: Mrs S Arnold, Mrs A Claussen-Reynolds, Mr N Dixon, Mr T FitzPatrick, Mr J Lee, Mrs J Oliver, Mr W Northam, Miss B Palmer, Mr R Price, Ms M Prior

All other Members of the Council for information.  
Members of the Management Team, appropriate Officers, Press and Public.



**If you have any special requirements in order to attend this meeting, please let us know in advance**  
If you would like any document in large print, audio, Braille, alternative format or in a different language please contact us

**Heads of Paid Service:** Nick Baker & Steve Blatch  
**Tel** 01263 513811 **Fax** 01263 515042 **Minicom** 01263 516005  
**Email** [districtcouncil@north-norfolk.gov.uk](mailto:districtcouncil@north-norfolk.gov.uk) **Web site** northnorfolk.gov.uk

**Cabinet  
Decision**

hold. The 71 activities reported on are 63 from the Annual Action Plan 2017/18 and eight activities from the Annual Action Plan 2016/17 that were not completed last year. Performance is being closely monitored, particularly for the activities where issues or problems have been identified (seven). Four reports have not yet been provided. These will be provided for the final version of the report. See Chart 1 below.

2. Of the 24 performance indicators where a target has been set twenty are on, above or close to target and four below target. Where assessment against the same period last year is possible (32 indicators), sixteen are improving, five are static and eleven are worsening.
3. The delivery of the Annual Action Plan is progressing according to plan. However, there are a few performance issues in achieving targets and improvement. The issues involved, and action being taken in each case, are detailed in the remainder of the document.

Recommendations:

1. **That Cabinet notes this report, welcomes the progress being made and endorses the actions laid out in Appendix 1 being taken by management where there are areas of concern.**
2. **That Cabinet approve the removal of the Economic Growth performance indicators J 023 and J 024 for the reasons given in Section 3 of this report.**

Reasons for  
Recommendations:

To ensure the objectives of the Council are achieved.

Cabinet member(s):  
Ward member(s)  
Contact Officer  
telephone  
and e-mail:

Cllr T FitzPatrick  
All  
Helen Thomas  
01263 516214  
[helen.thomas@north-norfolk.gov.uk](mailto:helen.thomas@north-norfolk.gov.uk)

**12. HORNSEA PROJECT THREE OFFSHORE WIND DEVELOPMENT (page 114)**

Summary:

This report details the District Council's proposed response to the Provisional Environmental Impact Report prepared by DONG Energy in support of its proposed Hornsea Project Three offshore wind development.

Options  
considered:

Not applicable – the District Council would be disadvantaged in not commenting on these proposals

Conclusions:

That North Norfolk District Council should submit a response to the formal process of consultation being undertaken by DONG Energy in respect of its Hornsea Project Three offshore wind proposal

Recommendations:

**Cabinet is asked to:-**

- **endorse the content of this report as being the Council's formal position and response to the current round of consultation being undertaken in respect of DONG Energy's Hornsea Project Three offshore windfarm development, and**
- **re-state the Council's ongoing commitment to discuss and negotiate with DONG Energy to achieve the best outcome for North Norfolk from this major development proposal.**

Reasons for Recommendations:

To publicly state North Norfolk District Council's position with respect to the impact this major development might have on local communities in parts of North Norfolk.

**LIST OF BACKGROUND PAPERS AS REQUIRED BY LAW**

*(Papers relied on to write the report, which do not contain exempt information and which are not published elsewhere)*

[www.dongenergy.co.uk/hornseaproject3](http://www.dongenergy.co.uk/hornseaproject3)

Cabinet Member(s)  Nigel Dixon, Cabinet portfolio holder for Economic Growth  Sue Arnold, Cabinet portfolio holder for Planning	Ward(s) affected:-  High Heath and Corpusty
---	---

Contact Officer, telephone number and email:

Geoff Lyon, Major Projects Manager 01263 516226; [geoff.lyon@north-norfolk.gov.uk](mailto:geoff.lyon@north-norfolk.gov.uk)

Steve Blatch, Corporate Director and Head of Paid Service, 01263 516232; [steve.blatch@north-norfolk.gov.uk](mailto:steve.blatch@north-norfolk.gov.uk)

13. **RESPONSE TO NORTH NORFOLK CONSULTATION – CABINET REPORT** (page 141)

Summary:

This report provides a response from North Norfolk District Council (NNDC) to the public consultation and engagement document published by North Norfolk Clinical Commissioning Group (NNCCG) in respect of Benjamin Court Healthcare Unit.

Conclusions:

The proposed changes to the Benjamin Court Healthcare Unit will increase specialist inpatient and

**HORNSEA PROJECT THREE OFFSHORE WIND DEVELOPMENT**

Summary: This report details the District Council’s proposed response to the Provisional Environmental Impact Report prepared by DONG Energy in support of its proposed Hornsea Project Three offshore wind development.

Options considered: Not applicable – the District Council would be disadvantaged in not commenting on these proposals

Conclusions: That North Norfolk District Council should submit a response to the formal process of consultation being undertaken by DONG Energy in respect of its Hornsea Project Three offshore wind proposal

Recommendations: **Cabinet is asked to:-**

- **endorse the content of this report as being the Council’s formal position and response to the current round of consultation being undertaken in respect of DONG Energy’s Hornsea Project Three offshore windfarm development, and**
- **re-state the Council’s ongoing commitment to discuss and negotiate with DONG Energy to achieve the best outcome for North Norfolk from this major development proposal.**

Reasons for Recommendations: To publicly state North Norfolk District Council’s position with respect to the impact this major development might have on local communities in parts of North Norfolk.

**LIST OF BACKGROUND PAPERS AS REQUIRED BY LAW**

*(Papers relied on to write the report, which do not contain exempt information and which are not published elsewhere)*

[www.dongenergy.co.uk/hornseaproject3](http://www.dongenergy.co.uk/hornseaproject3)

<p>Cabinet Member(s)</p> <p>Nigel Dixon, Cabinet portfolio holder for Economic Growth</p> <p>Sue Arnold, Cabinet portfolio holder for Planning</p>	<p>Ward(s) affected:-</p> <p>High Heath and Corpusty</p>
--	--

Contact Officer, telephone number and email:

Geoff Lyon, Major Projects Manager 01263 516226; geoff.lyon@north-norfolk.gov.uk

Steve Blatch, Corporate Director and Head of Paid Service, 01263 516232;  
steve.blatch@north-norfolk.gov.uk

## 1. Introduction

- 1.1 Hornsea Project Three is an off-shore wind farm proposal developed by DONG Energy, which would be located approximately 160km due east of the Humber estuary and approximately 121 km north east of the North Norfolk coast, this being the closest landfall point to the turbine field. The wind farm would have a total generating capacity of up to 2,400 MW (2.4GW) and be one of the largest off-shore wind farms in the world with the potential to supply up to 2 million homes (**see fig 1**). The precise number, size and model of turbine to be used in the development will depend upon technology available in the future but the maximum number would be 342. DONG Energy have been offered a connection into the UK national electricity transmission infrastructure by National Grid at the Norwich Main substation, due south of Norwich, and therefore require to lay underground cables across parts of North Norfolk, Broadland and South Norfolk so that the electricity generated can connect with National Grid infrastructure (**see figs. 2-6**).
- 1.2 Hornsea Project Three is a project that will consist of an offshore generating station(s) with a capacity of greater than 100 MW and therefore is a Nationally Significant Infrastructure Project (NSIP), as defined by Section 15(3) of the Planning Act 2008. As such, there is a requirement for DONG Energy to submit an application for Development Consent to the Planning Inspectorate (PINS) to be decided by the Secretary of State for Business, Energy and Industrial Strategy. This process involves NNDC as a statutory consultee. In the process of developing the proposal to date, Dong Energy has consulted with the District Council on its proposals in the period since May 2016 and has staged two rounds of public consultation in which they have outlined their proposals and identified an initial landfall and onshore cable route. These elements have now been refined to the point that a Preliminary Environmental Information Report (PEIR) has been prepared and is now the subject of formal consultation.
- 1.3 The District Council is therefore now provided with a formal opportunity to comment on the proposed development and how it might impact upon the District as part of the NSIP process, in advance of formal consideration of the Development Consent application which is anticipated during 2018.
- 1.4 This report therefore details the District Council's position with respect to the emerging Hornsea Project Three proposal.

## 2. The Project Proposal (overview)

- 2.1 The boundary of the Hornsea Project Three encompasses the:-

- Hornsea Project Three array area: This is where the offshore wind farm will be located, which will include the wind turbines, wind turbine foundations, array cables, and a range of offshore substations and offshore interconnector cables;
- Hornsea Project Three offshore cable corridor: This is where the offshore export cables, as well as the offshore High Voltage Alternating Current (HVAC) booster station(s) if required, will be located;
- Hornsea Project Three onshore cable corridor area: This is where the onshore export cables, as well as the onshore HVAC booster station if required; and
- Onshore substation and connections to the National Grid.

## 2.2 Other key components of Hornsea Project Three could consist of:

- Operations and maintenance facility (likely to be located at Grimsby alongside existing DONG infrastructure and facilities);
- Up to three offshore accommodation platform(s) for service technicians;
- Array cables linking the individual wind turbines to an offshore substation; and
- A HVAC or High Voltage Direct Current (HVDC) transmission system (yet to be determined) which will transmit the electricity between the turbine field and the national grid infrastructure. Dependent on the chosen transmission method the associated infrastructure would include including either:
  - HVAC:-
    - Up to 12 offshore HVAC collector substation(s);
    - Interconnector cables(s);
    - Offshore export cable(s);
    - Up to four offshore HVAC booster station(s) or up to six subsea HVAC booster station(s);
    - Onshore export cable(s);
    - Onshore HVAC booster station;
    - Onshore substation; and
    - Grid connection export cable(s)
  - HVDC:-
    - Up to 12 offshore HVAC collector substation(s);
    - Offshore interconnector cables(s);
    - Up to four offshore converter substations;
    - Offshore export cables(s);
    - Onshore export cables(s);
    - Onshore substation; and
    - Grid connection export cable(s).

## 3.0 Purpose of Consultation

- 3.1 The application for Development Consent will comprise full details of the development proposal and will be accompanied by an Environmental Statement prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (the 'EIA Regulations') as amended.



- 3.2 The Preliminary Environmental Information Report (PEIR) has been prepared, the purpose of which is to set out the preliminary environmental information that has been gathered to assess the potential environmental effects of the development and to enable consultees to comment on the proposals.
- 3.3 This process affords an opportunity for DONG Energy to engage with PINS, statutory and non-statutory consultees during the pre-application process, inviting them to review those assessments undertaken to date and to provide comment, which in turn will inform the EIA process and associated Environmental Statement. Consultation on the PEIR began on 27 July 2017 North Norfolk District Council, as a statutory consultee, has until **20 September 2017** to provide a response to the Preliminary Environmental Information Report findings
- 3.4 The Environmental Statement, which will outline the full EIA for Hornsea Three, will be informed by stakeholder responses to this PEIR. The Environmental Statement, which will accompany the application for Development Consent, will be submitted to PINS in Quarter 2 of 2018.

#### **4.0 Elements of the Project Affecting North Norfolk**

4.1 North Norfolk District Council's jurisdiction extends inland from mean the low-water mark along the coastline. This would include a small section of the proposed offshore cable corridor where it meets landfall. Whilst the precise landfall location has not yet been fixed, this is identified as being in the Weybourne area. Three possible routes for the onshore cable leading from Weybourne are being investigated. These are passing the east and west side of Weybourne village and with a further alternative option further to the west passing close to the eastern boundary of Kelling village and then to the south east of Kelling Heath. All three routes would have to pass under the A149 Coast Road, under the North Norfolk Railway track bed and then continue on past High Kelling where the cable would pass under the A148 to the east of the village. The cable then follows a route south between the villages of Hempstead and Baconsthorpe, between the villages of Edgefield and Plumstead (where a High Voltage Alternating Current (HVAC) substation is proposed) and then running west of Corpusty and Saxthorpe under the B1149 Holt Road and B1354 Briston Road before heading into Broadland District Council's area.

#### **4.2 Landfall at Weybourne**

4.2.1 The offshore export cables will make landfall near Weybourne Hope. The works at the landfall comprises infrastructure required to bring the offshore export cables through the intertidal area to a location where they can be connected to the onshore export cables. The offshore cables are connected to the onshore cables at Transition Joint Bays.

4.2.2 Transition Joint Bays are pits dug and lined with concrete, in which the jointing of the offshore and onshore export cables takes place. One Transition Joint Bay is required per export cable circuit. They are constructed to ensure that the jointing can take place in a clean, dry environment, and to protect the joints once completed. Once the joint is completed the Transition Joint Bays are covered and the land above reinstated. It is not expected that the Transition Joint Bays will need to be accessed during the operation of the wind farm, however link boxes need to be located nearby that do require access during the operational phase, these will also be reinstated but may have manhole covers for access. Additional Transition Joint Bays may be required at the landfall, to allow for flexibility during the construction process. To

account for this scenario the envelope includes for eight Transition Joint Bays at the landfall.

- 4.2.3 During landfall works, a construction compound is required on the onshore side of the beach. This will house the Transition Joint Bay works as well as any Horizontal Directional Drilling (HDD) works, including supporting equipment and facilities.
- 4.2.4 The techniques used to carry out the landfall works broadly fall in to two categories; open cut installation or trenchless techniques (i.e. Horizontal Directional Drilling (HDD) or thrust boring). DONG Energy have indicated that it may be possible to carry out a HDD to beyond the intertidal area, and install the rest of the cable using an offshore installation spread. The technical feasibility of this approach will require confirmation via an intrusive geotechnical survey campaign. However, it may also be the case that the HDD is not possible (due to ground conditions, cable design, or other factors), in which case open cut techniques would be required to install the cable from offshore to the Transition Joint Bays. It may also be the case that a HDD could be carried out to cross the shingle beach but would not reach the offshore area, in which case both methods would be required to carry out the landfall works.
- 4.2.5 The works at the landfall would primarily be the same irrespective of whether HVAC or HVDC transmission is selected. Once operational there will minimal visual impact of the landfall infrastructure, (i.e no buildings) other than a small number of manhole covers.

### 4.3 Cable Route

- 4.3.1 The Preliminary Environmental Information Report (PEIR) indicates that the construction of the onshore cable route would typically require a working corridor approximately 80 metres in width (**see figures 7 and 8 below**). At the outer edge of the corridor on both sides would be an area of soil scraped from the corridor route separated in to topsoil and subsoil. These soils would be put back once the cable laying works are completed. At the centre of the corridor would be a 6m wide haul road along which cable associated traffic would pass. Assuming full capacity is utilised, the wind farm would require the opening of six trenches (typically three either side of the haul road) using open cut methods and within each trench three cables would be laid for an AC system and two cables laid for a DC system. The cables would be laid at a typical depth of approximately 1.2m with some variances depending on ground conditions with cable depths ranging from as a deep as 2m up to a depth of 0.7m.
- 4.3.2 Whilst much of the route will use the open cut method, some sections will require the use of horizontal directional drilling (HDD) such as crossing under the majority of roads or where there are sensitive environmental considerations which dictate the use of HDD. Each HDD will require a compound at each side of the crossing point to house the HDD rig and the various supporting equipment and components required.
- 4.3.3 The onshore cable route would include joint bays and link boxes. These are typically concrete lined pits that provide a clean and dry environment for joining the sections of cable together and these will likely be completely buried when the land above is reinstated.
- 4.3.4 Once operational, whilst the cables are shielded, soils around the cables would be warmed by heat resulting from electricity transmission along the cable. Minimising the heating effect is critical for efficiency and trenches (whether open cut or HDD) are required to be apart from each other so as to reduce the effect of heating. Once laid

the cables would have a typical life span of 50+ years and remain in situ for the lifetime of the project (circa 25-30 years) and would likely remain in the ground after the wind farm has ceased operating.

4.3.5 Whilst the excavation of the cable route and laying of the cables would involve a degree of disturbance during the construction programme (further comment about which is set out below), there would be no permanent visual impact of the cable route across North Norfolk in the longer term other than visual clues such as way-markers.

#### 4.4 High Voltage Alternating Current (HVAC) Booster Station

4.4.1 A decision as to whether an AC or DC transmission system is used is yet to be taken and is likely to be dependent upon technological developments and cost issues. At the present time therefore the project proposals make provision for both technologies which, in the context of an AC system being used, requires the identification of a site for an onshore booster station along the route of the onshore cable corridor. This is because long distance, large capacity HVAC transmission systems require reactive compensation equipment to reduce the reactive power generated by the capacitance of the export cable in order to allow the power delivered to the National Grid to be useable.

4.4.2 In the early stages of consultation, DONG Energy identified three potential sites on which to locate and HVAC booster station between Hempstead and Corpusty, the evaluation of which has now identified a single preferred site, this being at land between Shrub Farm and Fuel Farm to the east of the B1149 (Holt Road) between Edgefield and Little Barningham.

4.4.3 Shrubs Farm is situated to the south of the site and there are a number of other individual farms and residential properties in the immediate area. The precise location of the HVAC station is not fixed at this stage. This site benefits from natural screening due to local topography and areas of natural screening which could be further established to help minimise visual and noise impacts.

4.4.4 The onshore HVAC booster station is primarily composed of High Voltage electrical reactors to correct the power factor of the transmitted electricity, as well as switchgear that connect the reactors into the export cable circuits. The onshore HVAC booster station would also contain auxiliary equipment for running and controlling the onshore HVAC booster station as well as structures to support and house the equipment. The equipment will either be housed within a single or multiple buildings, in an open yard or a combination of the above. There may also be some smaller buildings required to house components such as smaller equipment and control rooms. The precise design of the HVAC booster station has not been provided. However, DONG Energy has indicated the following maximum design scenario:

Parameter	Maximum design scenario
Permanent area of site for all infrastructure (m <sup>2</sup> )	25,000 (2.5 hectares)
Temporary area of site for construction works (m <sup>2</sup> )	25,000 (2.5 hectares)
Single building*: length (m)	150
Single building*: width (m)	30
Number of buildings	6
Multiple buildings*: dimensions (length & width, if	25

6 buildings) (m)	
Height of fire walls (m)	12.50
Building: height (m)	12.5
Maximum lightning protection height (m) (from ground level)	17.5

\* Note – the onshore HVAC booster station may comprise a single building or multiple buildings on the same site.

4.4.5 Once the windfarm is no longer operational and any such station becomes redundant, DONG Energy has indicated that the HVAC booster station site would be removed.

#### 4.5 Visible elements out at sea

4.5.1 Whilst the wind farm array itself would be well beyond the horizon when viewed from the North Norfolk Coast, if an off-shore HVAC booster station is required (and the evidence suggest this is highly probable due to the length of the off-shore cable) then the search area currently being assessed by DONG Energy indicate this could fall within the visibility of the North Norfolk Coast. The search area currently runs along the proposed cable route between Haddock Bank and Leman Bank and the North Hewett Field.

### 5.0 **Potential Direct Impacts of the proposal**

5.1 The potential impacts associated with Hornsea Project Three on communities in North Norfolk need to be considered in the short to medium term during the construction programme and then, in the longer term during the operation lifetime of the wind farm.

5.2 Impacts during construction would tend to be considered short/medium term and temporary in nature, depending on the timeframe for construction of the wind farm and the number of phases of construction. The level of impact on communities along the route may vary dependent upon the construction programme with particular concerns needing to be considered upon the local business, especially the tourism sector in Weybourne and Kelling and individual agricultural businesses along the route of the cable corridor.

5.3 Operational Impacts would generally be considered to be long term or permanent as they would likely endure for the expected 25+ years life of the wind farm.

5.4 Whilst a variety of different issues and impacts would arise, the main likely impacts of the proposal would be in relation to:-

- Landscape;
- Impact on Coastal Management and Coastal Processes;
- Impacts on Residential Amenity;
  - Noise
  - Light pollution
- Impacts on the local highway network; and
- Impacts on the local economy including tourism and agriculture

All of which are considered further below.

#### 5.5 Landscape Impacts

- 5.5.1 Volume 3, Chapter 4 within the Preliminary Environmental Information Report (PEIR) considers Landscape and Visual Resources. In considering the assessment of likely impacts DONG Energy has used a 1km buffer either side of the cable route and 1 and 5km buffers around the site of the proposed HVAC booster station site.
- 5.5.2 The PEIR considers in detail the differing landscape character types along the route of the cable through North Norfolk. DONG Energy has also considered the variety of different visual receptors likely to be affected within the 1km buffer zone of the cable route including:
- Occupiers of residential properties;
  - Users of public rights of way (PRoW) including National Trails, promoted paths, cycle routes and Access Land;
  - Tourist and recreational receptors (other than users of PRoW, etc.);
  - Users of community facilities;
  - Receptors at commercial/business premises; and
  - Dynamic receptors, i.e. occupiers of vehicles on roads, trains and marine vessels.
- 5.5.3 In respect of the HVAC booster station, Zone of Theoretical Visibility (ZTV) maps were generated using a worst case height of 12.5m to establish where, within a study area of 5 km from the proposed location, the onshore HVAC booster station might be theoretically visible from.
- 5.5.4 The PEIR sets the maximum design scenario in terms of landscape impacts during the construction phase, operation phase and decommissioning phase.
- 5.5.5 DONG Energy has set out that they consider the duration of any impacts as follows:
- Temporary short term (0-2 years),
  - Temporary medium term (2-5 years),
  - Temporary long term (5-15 years), or
  - Permanent (greater than 15 years).
- 5.5.6 In terms of the onshore cable corridor, DONG Energy has set out that this has been developed taking into account a number of constraints; in particular, ecological and landscape. The onshore cable corridor will be completely buried underground for its entire length. Where possible, the refined cable corridor will avoid areas of woodland and trees, or where this is not possible, Hornsea Three will seek to minimise tree loss.
- 5.5.7 Opportunities to avoid sensitive receptors will also be investigated, and detailed consideration will be given to the least disruptive, and potentially least visible, places to cross key rights of way. Visual screening of construction works and temporary compounds will also be considered.
- 5.5.8 Generally, affected hedgerows (including hedgerow trees) will be replaced. Species re-introduced will likely be those found within the existing hedgerow, or adjacent hedgerows, minus the tree species, but augmented with other locally native species if found to be species poor. Consideration will also be given to the enhancement of derelict and species-poor hedgerows within the construction corridor. The outline Landscape Scheme and Management Plan, which will accompany the Environmental Statement, will provide further detail on the mitigation proposals for minimising impacts on landscape and visual resources that will be agreed with the District

Council and will be considered in the identification of any likely effects during the preparation of the Environmental Statement chapter. **The District Council welcomes this approach.**

- 5.5.9 In respect of the proposed HVAC Booster Station, DONG Energy recognise that the site is located in a gently undulating landscape that is occupied by predominantly mixed farmland with a strong existing landscape framework.
- 5.5.10 DONG Energy has set out that the potential landscape mitigation for the onshore HVAC booster station will likely consist of a mix of woodland, shrubs and wildflower meadow on the boundaries of the site, incorporating existing planting if possible. Proposals will be detailed in the outline Landscape Scheme and Management Plan (LSMP) that will be agreed with the District Council. The mitigation set out in the LSMP will be taken into consideration during the determination of effects at the Environmental Statement stage. The extent of any potential landscape planting will be considered further once the design and site layout is further progressed. The arrangement of buildings on the sites also creates an opportunity to mitigate visual impacts, and opportunities to do that through careful positioning of buildings and equipment will be considered.
- 5.5.11 DONG Energy set out that they will also discuss and negotiate the façade treatment for the HVAC Booster Station to help reduce the visual impact of buildings, and to break up the impression of massing between different built elements within the same site.
- 5.5.12 In general, the approach being undertaken by DONG Energy in assessing landscape impacts **is accepted**. It is recognised that there will be localised impacts along the cable route through open-cut trenching resulting in some loss of vegetation, and associated visual impact as a result of the construction compounds and construction of HVAC booster station and some associated disturbance to wildlife.
- 5.5.13 Whilst these impacts are only likely to occur in the short-to medium term, if the project were to be developed out over a longer period, these impacts would be more significant and the opportunity for delivering landscape mitigation could well be reduced, particularly if trenches and/or the working corridor will have to remain open during the construction phase(s). The impact of prolonged construction phasing will need to be properly factored in to the assessment of the significance of effect within the Environmental Statement.
- 5.5.14 In terms of long term and permanent effects on the landscape, there will be a need to provide appropriate landscape mitigation particularly where open cut trenches affect field boundaries and landscape features such as mature trees. DONG Energy has indicated they will seek to do this but this would need to be set out within the mitigation strategy. **Where possible, the District Council would expect Horizontal Directional Drilling (HDD) to be used if routes through sensitive woodlands or landscapes cannot be avoided.**
- 5.5.15 DONG Energy has indicated that the HVAC booster station will be screen planted and **this is welcomed. Further, the District Council would expect opportunities to enclose the HVAC site in woodland planting to be explored so as to help address potential noise impacts associated with these facilities which is stated to be of concern to local residents.**
- 5.5.16 In terms of delivering wider public benefits, there may be opportunities for DONG Energy to fund wider landscape mitigation to repair historical damage to field

boundaries resulting from modern agricultural practices and to enhance local landscape character. This would also have the added benefit of helping improve biodiversity. Wider landscape enhancement could also improve the quality of walking and cycling opportunities in the countryside and enhance tourism to the benefit of the wider economy.

## 5.6 Impact on Coastal Management and Coastal Processes

- 5.6.1 Volume 2, Chapter 1 within the Preliminary Environmental Information Report (PEIR) sets out Marine Processes including an assessment of changes to hydrodynamics, sediment transport and beach morphology at the landfall at Weybourne Cliffs.
- 5.6.2 In considering the magnitude of impact DONG Energy has set out the likely impacts associated with sediment disturbance during trenching together with changes to the nearshore wave regime due to the presence of cable protection measures and HDD exit pits. Dong Energy predicts that all impacts during the construction phase are likely to be of local spatial extent, short-term duration, continuous and of high reversibility. It is predicted by DONG Energy that the impacts will affect the receptor directly (in the case of trenching across the beach) and indirectly (in the case of cable protection measures and/or HDD exit pits potentially modifying the nearshore wave regime). The magnitude is therefore, considered to be minor.
- 5.6.3 Given that all impacts at the landfall are anticipated to be of local spatial extent and short-term duration, DONG Energy consider there are no implications for strategies aimed at long term management of the coast as set out in the Shoreline Management Plan and East Marine Plan. **This is a position the District Council supports.**
- 5.6.4 In terms of the sensitivity of the receptor, Weybourne Cliffs are a Site of Special Scientific Interest (SSSI), and are immediately adjacent to the North Norfolk Coast SSSI and Wash and North Norfolk Coast Site of Community Importance (SCI). Accordingly, the shoreline at the landfall is considered to be of high value. However, the shoreline is typically a dynamic environment which is often subject to a large amount of natural change under baseline conditions. Accordingly, it is assessed by DONG Energy to have some capacity to recover from disturbance.
- 5.6.5 In summary, the shoreline is deemed by DONG Energy to be of minor vulnerability, moderate to high levels of recoverability and high value. The sensitivity of the receptor is therefore considered by DONG Energy to be medium.
- 5.6.7 In terms of the significance of the effect, overall, DONG Energy predict that the sensitivity of the receptor is considered to be medium and the magnitude is deemed to be minor. The effect will, therefore, be of minor adverse significance, which is not significant in EIA terms according to DONG Energy.
- 5.6.8 **The Council's Coastal Manager considers that the PEIR and supporting information includes the key areas requiring assessment and investigation with regard to coastal management and coastal processes.**
- 5.6.9 Whilst the method of construction in the nearshore/landfall location needs to be considered further and in more detail, initial consideration is that a HDD approach would prove to be the least likely to have impacts on nearshore processes during construction and would be preferred. This should (in consideration with other marine environmental factors) be at an extent where HDD exit points have minimal impact on nearshore coastal processes. Likewise buried cabling as identified in the reports

would be preferred to minimise impacts to coastal processes with low profile protection being the secondary position.

- 5.6.10 Impact of the proposed cables on tides and, in particular, waves and the influences this may have on coastal sediment transport are important factors that the Environmental Statement will need to include and PEIR seems to be making progress in covering these important issues.
- 5.6.11 Regarding decommissioning in future years, **the Coastal Manager is of the opinion that this should be included in the development of the proposal** and any consents/licences should ensure appropriate measures are put in place to require such decommissioning and reinstatement at a specific and agreed point once the infrastructure has become redundant.
- 5.6.12 **In conclusion, The Council considers that the PEIR is addressing the main areas relevant to coastal management and coastal processes near landfall relevant for consideration by North Norfolk District Council.**
- 5.6.13 However, it has to be recognised that, in the landfall area, sections of the beach may have to be closed temporarily to allow for cable installation operations. Work behind the beach will involve heavy machinery to construct the Transition Joint Bays and heavy machinery will also be involved in the cable crossing of the beach. Closure of the beach could result in other adverse impacts on local business including tourism related activities, which are considered below.

#### 5.7 Impacts on Residential Amenity – Noise

- 5.7.1 Volume 3, Chapter 8 of the Preliminary Environmental Information Report (PEIR) considers Noise and Vibration.
- 5.7.2 DONG Energy recognise within the report that construction and operational noise and vibration have the potential for adverse impacts and effects on nearby people, which can affect the use of their residential property, their enjoyment of outdoor recreation areas, or other activities for which noise might otherwise disturb. Together, these uses are identified as noise and vibration sensitive receptors (NSR). For construction and decommissioning, DONG Energy has indicated that the noise and vibration study area considers NSRs and Public Rights of Way (PRoWs) within approximately 1 km of the onshore elements (this would include the proposed cable route(s), HVAC booster station and construction compounds.
- 5.7.3 In terms of the specific activities that could result in noise impacts, the following observations are considered relevant:

#### 5.7.4 Cable laying – Open Trench

Experience from other on-shore cable laying processes that have taken place in the District indicate that the impacts from open cut trenching are generally localised, short in duration and usually only occur during daylight hours. As such, whilst further detail is still to be provided as to specifics of the construction process, **the Council's Environmental Protection Manager is content with the work being undertaken by DONG Energy for assessing noise impacts from this activity.**

#### 5.7.5 Cable Laying – Horizontal Directional Drilling (HDD)



The HDD process involves mechanical drilling which can create noise and vibration impacts. At this stage a final decision has not been made by DONG Energy about where the use of HDD is to be proposed and therefore it will be important for the final Environmental Statement to set out these details and identify the vibration and noise sensitive receptors that could be affected and any mitigation that may be necessary to minimise adverse impacts.

#### 5.7.6 HVAC Booster Station

Noise and vibration impacts associated with the HVAC booster station would occur during construction and, once commissioned, during the operational life of the windfarm.

Construction impacts are likely to be limited if appropriate mitigation is used and would be short-to medium term in duration. Construction details to minimise adverse impacts can be agreed with DONG Energy at a later stage.

In terms of the operational phase the expected noise levels from the HVAC booster station, as set out by DONG Energy, would have an impact on the nearby dwellings. The noise assessment does recognise this and does identify the need for further mitigation once the designs and decisions are finalised.

In considering noise impacts, it has to be recognised that the rural nature of the surrounding landscape means that night time noise levels in the area are generally low, if not very low and therefore the potential for noise from equipment to become audible above background noise level increases and this issue has been identified as a concern by local residents close to the proposed HVAC booster station site.

**5.7.7 The Council's Environmental Protection Manager remains confident the noise levels from equipment and cooling fans can be reduced to a position where there would be no impact on the local community, as they are only just over background noise levels and could be sufficiently reduced through effective design.**

**5.7.8 The District Council would expect the opportunity for further dialogue with DONG Energy to secure a satisfactory solution for the HVAC booster station which addresses and mitigates potential noise impacts (in addition to discussions relating to planting and visual impact on the wider landscape).**

#### 5.8 Impacts on Residential Amenity – Light Pollution

5.8.1 DONG Energy has confirmed that external lighting will not be required for the operational wind farm save for limited lighting for the HVAC booster station for health and safety purposes or in the event of an emergency requiring repairs during the night. **The District Council are satisfied that external lighting can be adequately controlled through imposition of appropriate conditions** at Development Consent Order stage and lighting would therefore be unlikely to adversely affect residential amenity.

#### 5.9 Impact on Local Highway Network (including public rights of way)

5.9.1 Volume 3, Chapter 7 of the Preliminary Environmental Information Report (PEIR) considers Traffic and Transport issues. The report looks at baseline traffic data and the impact of traffic movements associated with the Hornsea Three project.

- 5.9.2 DONG Energy set out in the PEIR that the construction phase will generate the greatest number of vehicle movements as the transportation of materials for the haul road and removal of excess spoil from trenching will incur the greatest number of HGV and staff movements.
- 5.9.3 DONG Energy has indicated that the level of vehicles generated during the operational and maintenance phase will be very low and irregular, only a few vehicle movements per week, whilst those during the decommissioning phase will be lower than those the construction phase.
- 5.9.4 The Environmental Statement that will be submitted with the Development Consent Order will set out proposed access routes and access points to the cable corridor and demonstrate their suitability. It will set out future baseline traffic scenarios using traffic surveys which will have been undertaken and it will assess the effects of the construction traffic via an impact assessment upon:
- driver delay;
  - severance of routes;
  - pedestrian delay;
  - pedestrian amenity;
  - accidents and road safety; and
  - hazardous, dangerous and abnormal indivisible loads.
- 5.9.5 The PEIR sets out a number of designed in measures to be adopted as part of the project including:
- Identification of suitable HGV routes;
  - Video condition surveys will be undertaken before the start of works and after the substantial completion of works on minor links used by HGVs to access the onshore cable corridor. Damage to the highway caused by construction traffic will be repaired;
  - A route for abnormal loads will be identified and the route timing and method of transport of abnormal loads will be discussed and agreed with Highways England, the police and relevant highways and bridge authorities;
  - Standard construction working hours will be identified. For the onshore cable corridor and substation these are likely to be 07.00 to 18.00 on weekdays and 07.00 to 13.00 on Saturdays and for the HDD at landfall and other sites are proposed to be 24 hours, seven days a week during drilling contingent on ground conditions;
  - Restrictions on HGV operating hours, along those sections of the highway network that provide access to local schools;
  - Restrictions on HGV operating hours and measures to minimise the number of HGV movements through sensitive areas;
  - Wheel washing at all site access points where it is necessary to eliminate the risk of mud and debris on the highway;
  - Measures to minimise dust and dirt associated with the movement of construction vehicles;
  - The provision of appropriate parking facilities for construction workers;
  - Traffic management measures at those points where cable trenches are cut across highways or where existing access rights are affected; and

- The diversion of rights of way affected by the construction works with closures only when absolutely necessary

## **5.0 Anticipated timescale for completion**

- 5.1 Within Volume 1, Chapter 3 of the Project Description, DONG Energy has provided high-level indicative construction programmes setting out anticipated timescales for scenarios where the wind farm is built out in either single, two or three phases (see **Figure 9**). The programmes illustrate the likely duration of the major installation elements, and how they may relate to one another if built out in different phase construction campaigns. It covers installation of the major components and does not include elements such as preliminary site preparation, and commissioning of the wind farm post-construction. DONG Energy has indicated that further details of where preliminary site preparation work will fit within the outline programme will be presented in the final application. Onshore construction is currently planned to commence in 2021.
- 5.2 However, there remains the prospect that Hornsea Project Three could be constructed in two or three phases, including the potential for an overlap or a gap between the completion of construction of one phase and the start of construction of another. However, DONG Energy has indicated that if the construction of any phases are overlapping, the construction durations and total values for individual parameters will never exceed those stated for a single phase. It is possible that some activities may be carried out during an earlier phase for the benefit of a later one. However, DONG Energy has made clear that any works completed for a later phase(s) would be left in a safe state, as agreed with the relevant authorities.
- 5.3 Should Hornsea Project Three be built out in multiple phases (up to a maximum of three), it is possible that these phases could be constructed directly after one another but it is also possible that there may be gaps between the construction of the phases. There are various possible reasons for this including, for example, constraints in the supply chain or the requirements of the Government's Contract for Difference process which offshore wind farms currently rely on to secure a price for the electricity produced by a project. Consideration of a range of possible influences suggests a maximum gap between the same project element in different phases (i.e. the end of piling of foundations for one phase and the start of piling of foundations on the next phase) of up to six years. However, this scenario is only considered likely where Hornsea Project Three is built out in two phases. If Hornsea Project Three were built out in three phases, the maximum indicative gap between the same component of Hornsea Project Three in different phases would be four years and this would assume that two phases were built out sequentially either before, or after, the gap to the third.
- 5.4 Nonetheless, there remains the prospect that a three-phased construction programme could take up to 11 years to complete, in the worst case scenario.

## **6.0 Impacts on Local Economy – Tourism**

- 6.1 The Hornsea Project Three scheme proposes landfall at Weybourne and the laying of underground transmission cables southwards through North Norfolk to the district boundary with Broadland to the west of Corpusty. Whilst the District Council acknowledges that the long-term impacts of the project in North Norfolk will be pretty benign, except for the operation of the proposed HVAC booster station between Little Barningham and Edgefield; the District Council shares the concerns of the local

community and businesses of the impact of the construction works programme on tourism, which is a vital sector of the local economy, particularly in this part of North Norfolk.

- 6.2 The construction of the landfall at Weybourne and the onshore cable route, particularly the northern element which lies to the north of the A148 Holt to Cromer road within the Norfolk Coast Area of Outstanding Natural Beauty will have a significant impact on the local landscape, communities and tourism businesses of Weybourne, Kelling and High Kelling during the construction programme. The District Council is therefore concerned at the consideration DONG Energy is giving to possibly phasing construction works over a period of up to eleven years and believes such an extended period of works with the re-opening of the cable corridor, perhaps three times, would have a very significant and long-term impact on both the local community and tourism businesses, both within the immediate area of the works and indeed the wider area, given the significant landscape character of this area and the concentration of tourism businesses – both accommodation providers and attractions.
- 6.3 The landscape character of the immediate Weybourne area, lying as it does to the north of the Cromer Ridge and served only by four roads into the village – ie. the A149 coast road and two minor roads to the south of the village – Station Road to Bodham, which crosses the North Norfolk Steam Railway (NNR) and passes the NNR Weybourne station, a popular riding stables and the Kelling Heath Holiday Park site, and Holt Road which takes a south-westerly route out of the village and passes across the Kelling Heath SSSI; is such that any construction works of the cable corridor will have a significant adverse impact on the local area in terms of the visual impact of the cable corridor through the landscape, together with the noise and congestion associated with the construction works.
- 6.4 Further, at Weybourne Hope to the north of the village where landfall is to be achieved, the construction works will be immediately adjacent to the Beach Road car park, significantly compromising the views and “remoteness” of this area which affords long distance views east and west along the coast at a point where the character of the coast changes significantly from cliffs to the east towards Sheringham and the long shingle bank to the west towards Blakeney.
- 6.5 Weybourne itself has a large number of tourism businesses – small caravan and camping sites, self-catering properties, two small chalet parks, food and drink establishments and attractions such as the North Norfolk Railway and the Muckleburgh Collection, as well as being visible from key vantage points from the National Trust’s Sheringham Park to the east; whilst to the south of the village is the large Kelling Heath Holiday Park and Breck Farm camping site. The area is also popular for walking, cycling and horse-riding, lying on the route of the Norfolk Coast Path and a number of circular walks from Sheringham Park and over Kelling and Weybourne Heaths, Muckleburgh Hill. The popular tourist towns of Sheringham and Holt are both within five miles of Weybourne, whilst the village sits within the wider Norfolk Coast AONB between Cromer and Wells-next-the-Sea where visitor numbers have grown significantly in recent years as the public, private and voluntary sectors have worked hard to invest in the quality of the local tourism product so as to extend the tourism season beyond the traditional “summer” period.
- 6.6 To the south of the A148 road, the concentration of tourism businesses is less, but the area still makes a wider contribution to the North Norfolk tourism offer with local villages such as Baconsthorpe, Hempstead and Edgefield accommodating small-scale caravan and camping sites and self-catering holiday properties as well as

serviced accommodation, village pubs and Baconsthorpe Castle. The area is also popular for walking and cycling given its very rural character.

- 6.7 **Whilst the District Council recognises that construction of the landfall and cable route will have some impact on the local area, it believes this should be kept to an absolute minimum through sound project management and detailed consideration of the timing of the works – for example if the construction programme was for an 18 month programme the District Council would hope that the works could be programmed such that they would extend over two winter periods and only one summer season; so as to minimise the impact upon tourist visitors and businesses.**

## **7.0 Impacts on Local Economy – Agriculture**

- 7.1 The whole length of the cable corridor in North Norfolk passes through good quality agricultural land, the majority of which is under arable cropping. The District Council understands that landowners along the route of the cable corridor would be compensated for the land required for the cable route and some form of disturbance allowance for loss of income generated from the land for the duration of the contract to lay the cables.

- 7.2 The District Council is aware, through the delivery of earlier offshore wind cable routes across North Norfolk, that there might be different impacts on farm businesses of compensation payments made to tenant farmers, relative to principal landowners, and would ask DONG Energy to carefully consider the interests of such farmers so that their businesses aren't disadvantaged through payments made to landowners without reference to the tenant farming enterprise.

- 7.3 **However, the District Council would also expect DONG Energy to liaise with farmers, landowners and their contracting partners in order to minimise the wider impact of the construction works programme on planting, harvesting operations etc in terms of vehicular access along very narrow roads, so that time critical operations such as harvesting around weather windows are not compromised.**

## **8.0 Impact on local fishermen**

- 8.1 The District Council is aware of the significant impact which the surveying and offshore cable works can have on local inshore fishermen and asks that DONG Energy carefully considers how any programme of works can be scheduled so as to minimise the impact of any offshore works on local fishing businesses, both fishermen and local processing businesses, the latter of which have not previously been considered when compensation payments have been made to fishermen in lieu of their being able to go to sea and yet the reduction in catch has had impacts on their processing businesses within the local area.

## **9.0 Other Impacts**

- 9.1 The Preliminary Environmental Information Report (PEIR) considers a range of other issues including:

- Hydrology and Flood Risk;
- Ecology and Nature Conservation;
- Historic Environment

- Air Quality

9.2 Based on the information available, the District Council are satisfied that these matters are being adequately considered by DONG Energy in the preparation of the Environmental Statement to be submitted as part of the future Development Consent Order.

## 10.0 Public Benefits

### 10.1 National

10.1.1 North Norfolk District Council recognises the public benefits which will be derived nationally, and indeed internationally, through the development of offshore wind electricity generation and has previously worked with developers off the North Norfolk Coast in the delivery of similar such schemes – particularly the Sheringham Shoal and Dudgeon schemes, both of which have achieved landfall at Weybourne and seen the accommodation of onshore cable routes across the District. Further, the construction of the Sheringham Shoal development was project managed from Wells-next-the-Sea and the operations and maintenance support for this development is provided from Egmere (Walsingham) and through the Port of Wells, providing long-term local benefits for the North Norfolk area in terms of jobs and related expenditure. **As a matter of principle therefore the District Council indicates its support for the Hornsea Project Three development in terms of the contribution it will make to UK energy supply in the future.**

### 10.2 Public Benefits / Impacts – Local

10.2.1 Notwithstanding the above, **North Norfolk District Council does have some significant concerns about the impact of the landfall and onshore cable works proposed for the Hornsea Project Three development which it believes will have a major impact on the local tourism and agricultural economy in North Norfolk with no real compensating benefits being realised in the local area, through long-term jobs or contracts being seen locally in North Norfolk.**

10.2.2 The District Council believes that the greatest (onshore) impact of the Hornsea Project Three development will be on tourism businesses in North Norfolk and that the project therefore needs to consider practical measures to minimise such impact through sound construction programme management. The District Council was therefore concerned to learn at a recent presentation that DONG Energy is having to give consideration to possibly phasing construction works over one, two or three phases, due to concerns the company has that any agreement reached with the Government through the Contract for Difference programme might seek to “break down” this large project into a number of smaller “phases”. This would result in a significant extension of the construction programme, from perhaps 18 / 24 months for delivery of the scheme in a single “phase”, through to between five and seven years for a two phase construction programme to a maximum of eleven years for a three phase programme. The District Council believes that any extension of the construction programme beyond a single phase would have a hugely damaging impact upon the local tourism sector in the Norfolk Area of Outstanding Beauty and would ask both DONG Energy and the Government to be mindful of the need to minimise such impact on the North Norfolk economy, particularly as there is very little potential for the area to benefit from any new jobs or contracts associated with the development, which it is understood is likely to be supported through its development and operations and maintenance phases from established facilities in Grimsby / The Humber Estuary.

### 10.3 Potential Mitigation

10.3.1 As part of the proposal, DONG are considering the establishment of a Community Benefits Fund. Similar schemes were established as part of the Sheringham Shoal and Dudgeon, the former of which is managed by the Norfolk Community Foundation and which is open to charities, community groups, parish and town councils, educational institutions and other non-profit organisations working in the North Norfolk area. The Sheringham Shoal fund aims to award half of the funding to Wells-next-the-Sea and the surrounding area with the remaining funds being available to the wider North Norfolk area. The Dudgeon off-shore wind farm community fund has not yet commenced.

10.3.2 Given the scale of the impacts on North Norfolk, particularly of any extended construction programme, the District Council would look to discuss with DONG Energy some form of impact mitigation / community benefit for the District moving forward. This could be related to the adoption of emerging technologies around electric vehicle charging and renewable energy solutions for the public estate in North Norfolk, for example through delivery of new leisure facilities. The District Council would expect further discussion with DONG Energy regarding potential mitigation opportunities as the project progresses.

### **11.0 Implications and Risks**

11.1 The implications and risks to parts of the North Norfolk District arising from this proposed development are detailed in this report.

### **12.0 Financial Implications and Risks**

12.1 There are no direct financial implications for the District Council arising from this report.

### **13.0 Sustainability**

13.1 This report details a proposed renewable energy development and outlines the potential impacts on parts of the North Norfolk District.

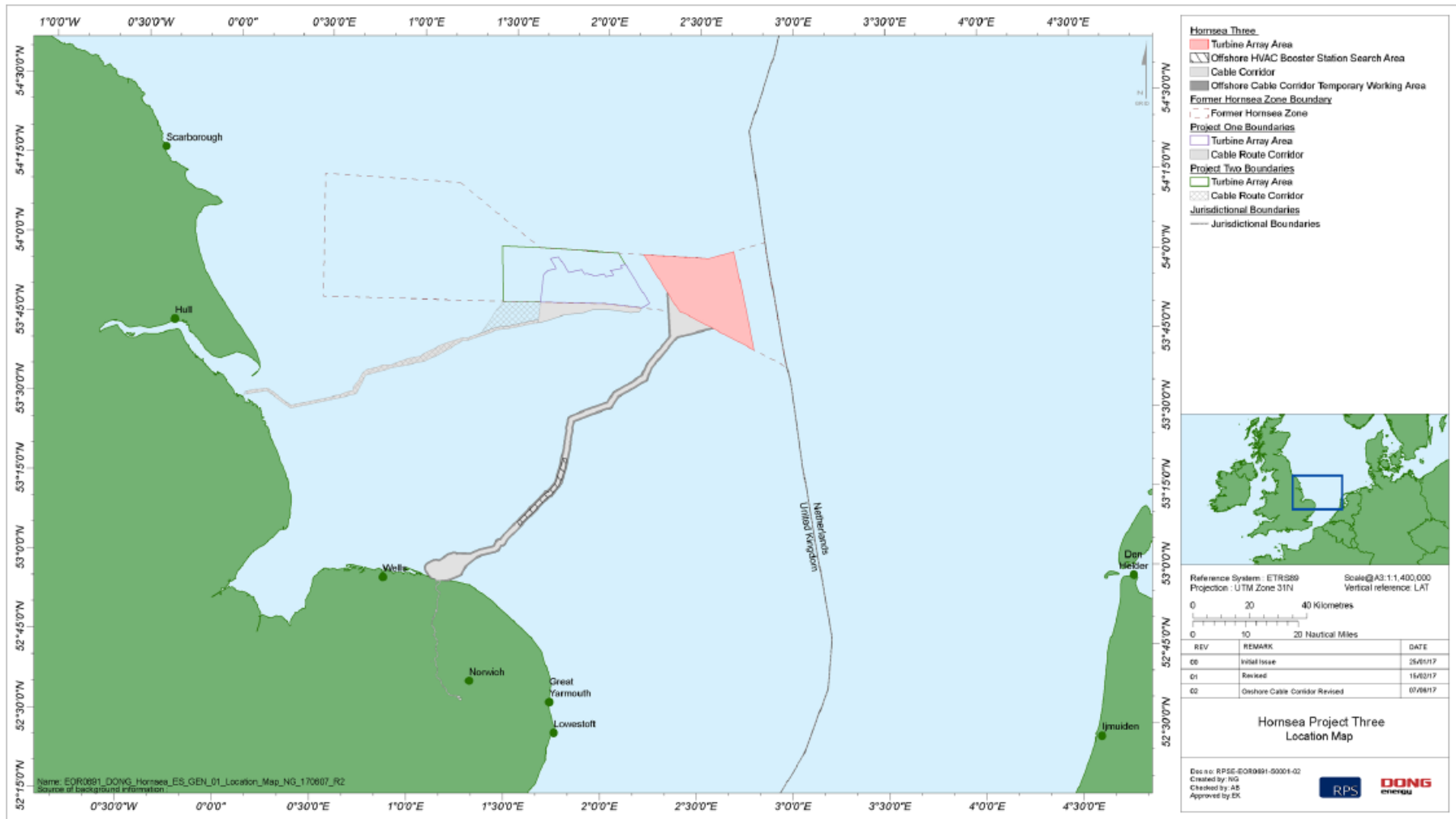
### **14.0 Equality and Diversity**

14.1 There are no direct equality and diversity issues arising from this report.

### **15.0 Section 17 Crime and Disorder considerations**

15.1 There are no crime and disorder issues arising from this report.

**Fig. 1 – Project Overview and wider context**



**Figure 1.1: Location of the proposed Horsea Three offshore wind farm project within the former Horsea Zone.**



**Fig. 2 – Project Overview (Norfolk)**

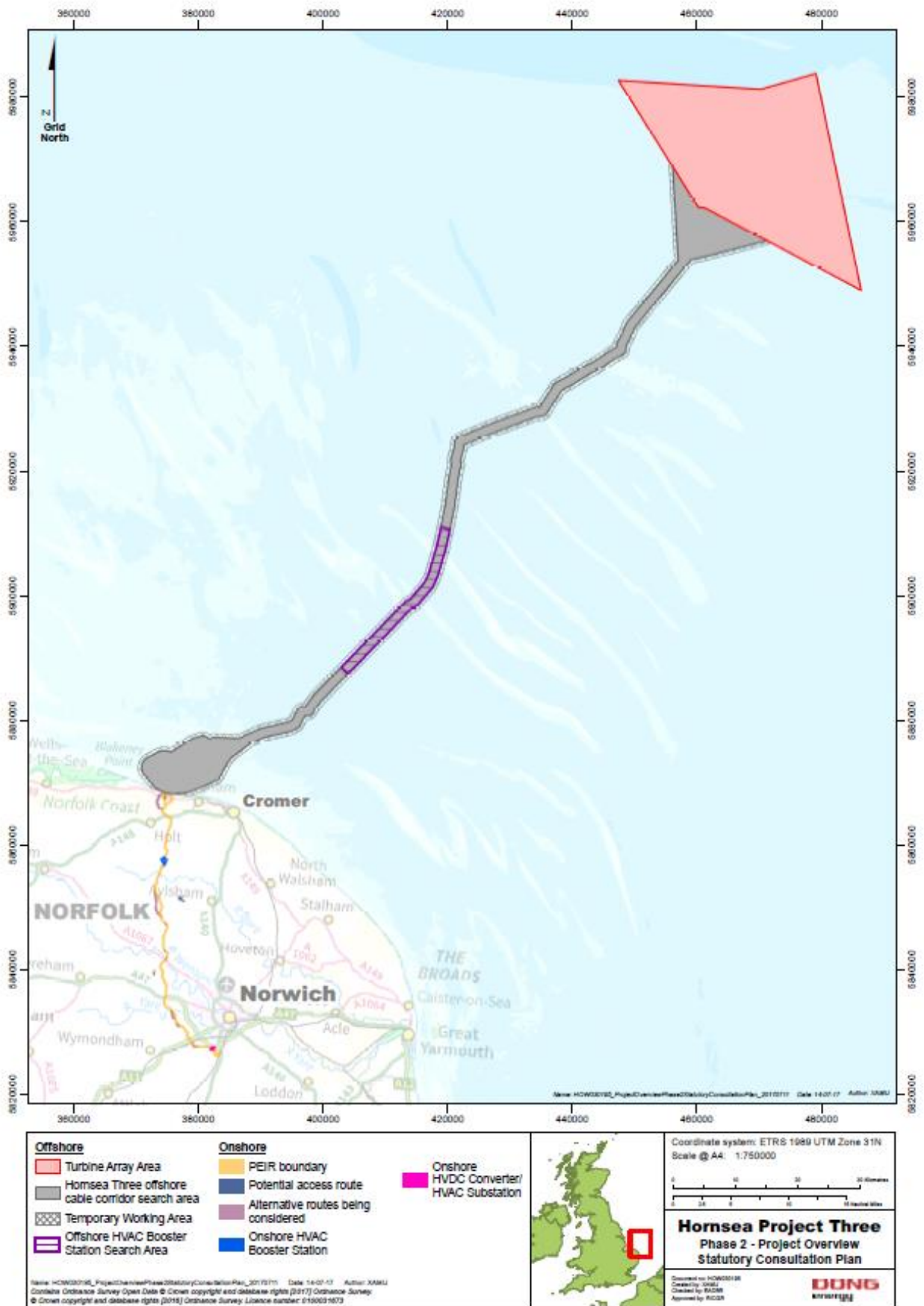


Fig.3 – Onshore cable route

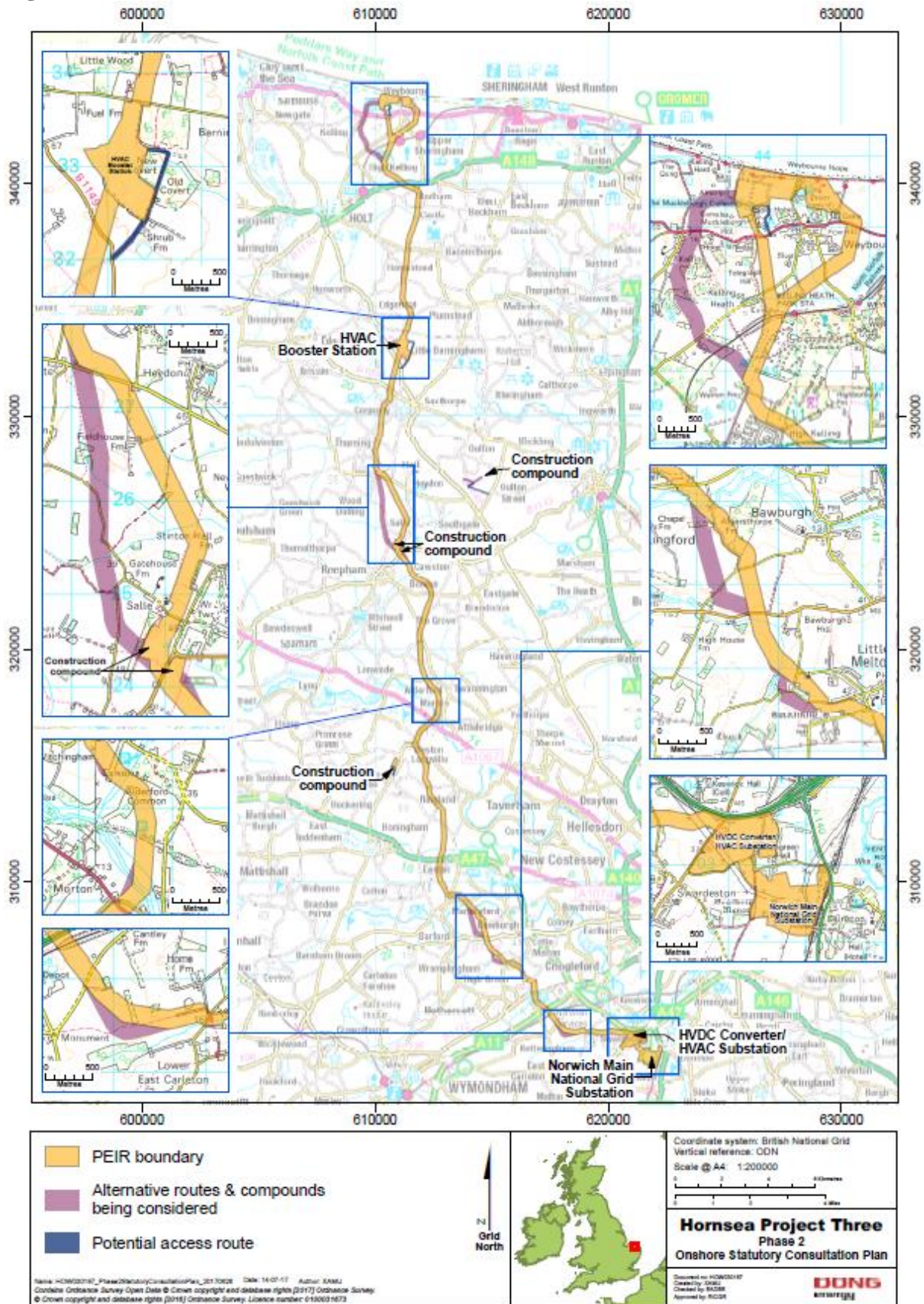
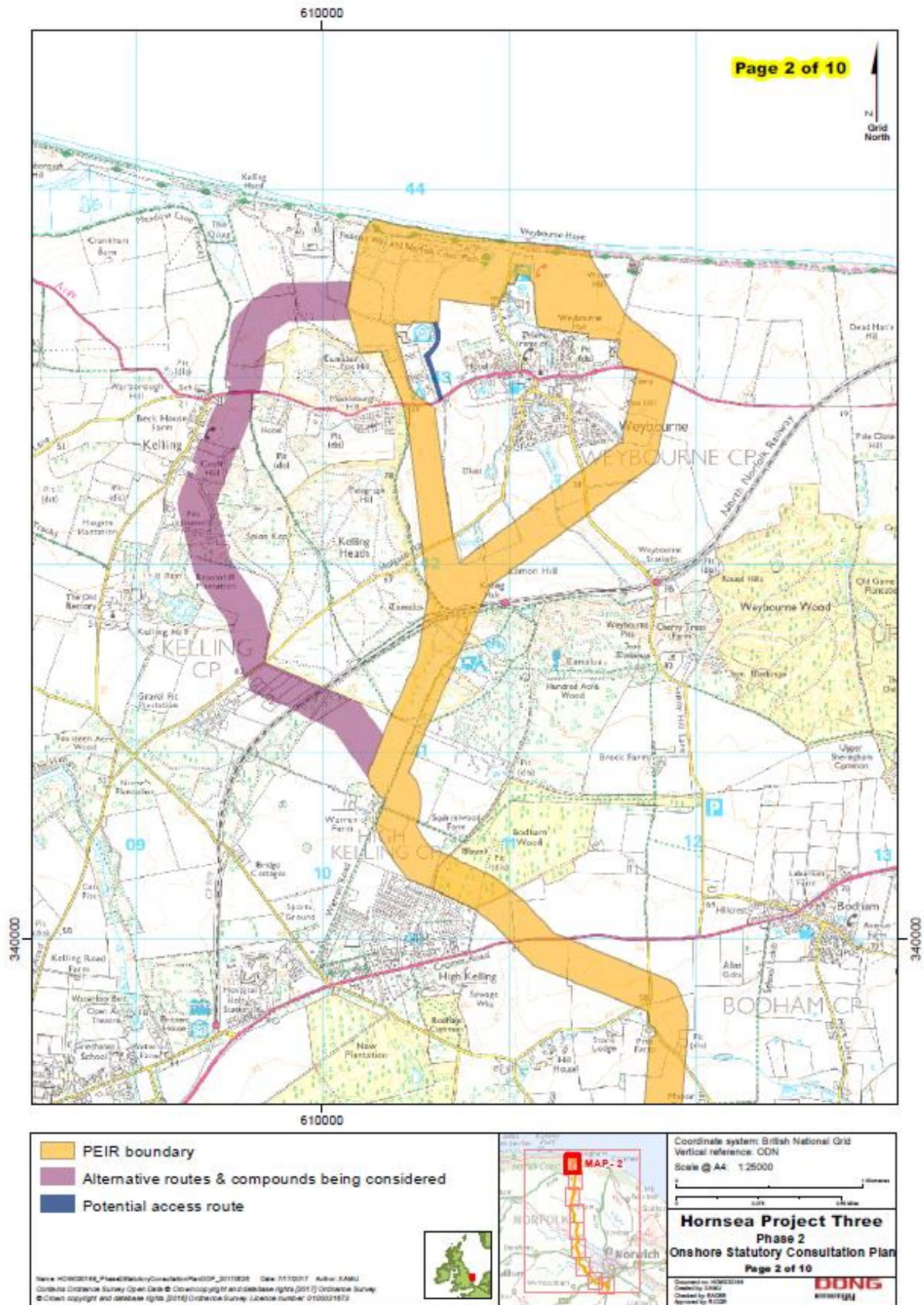
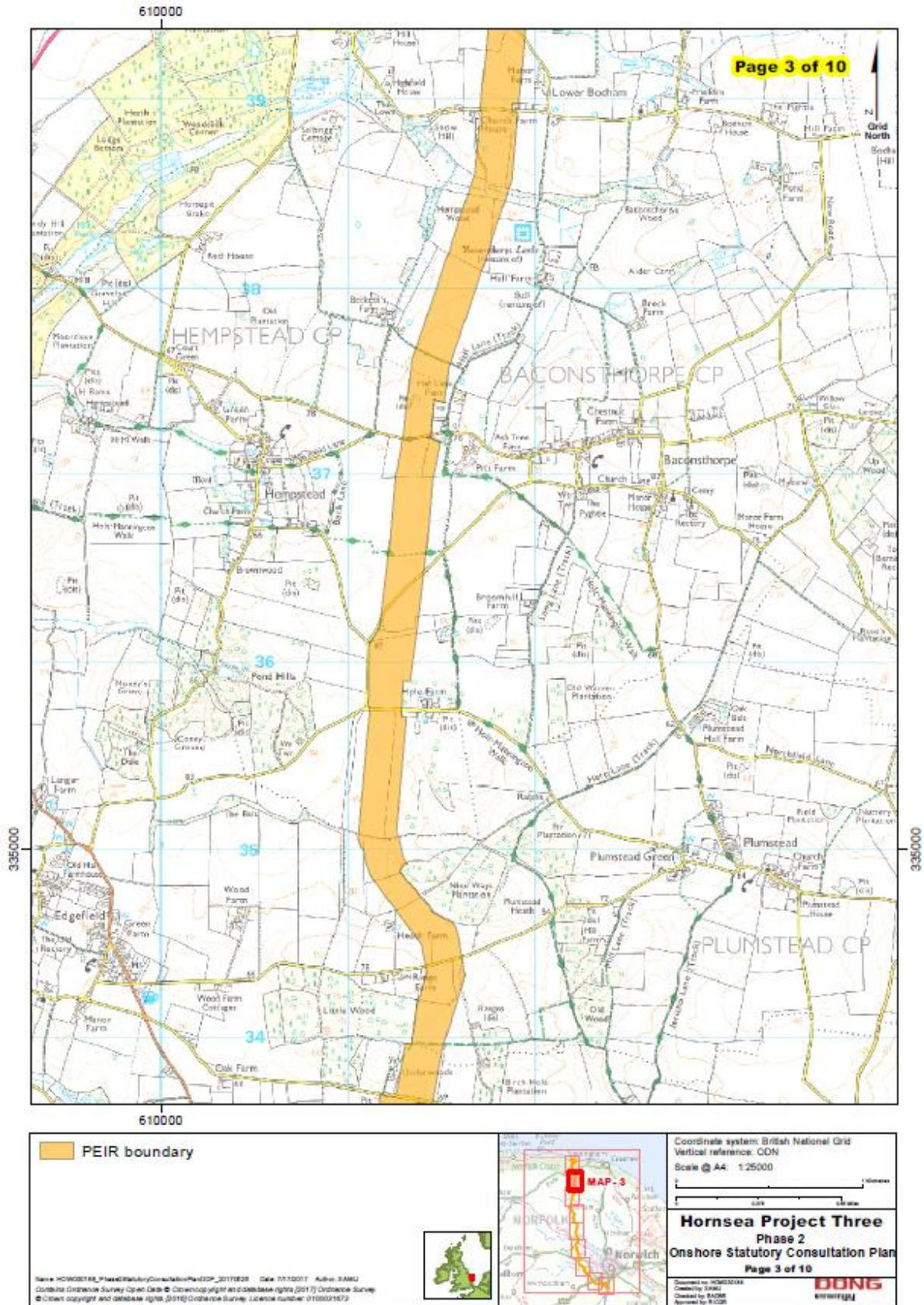


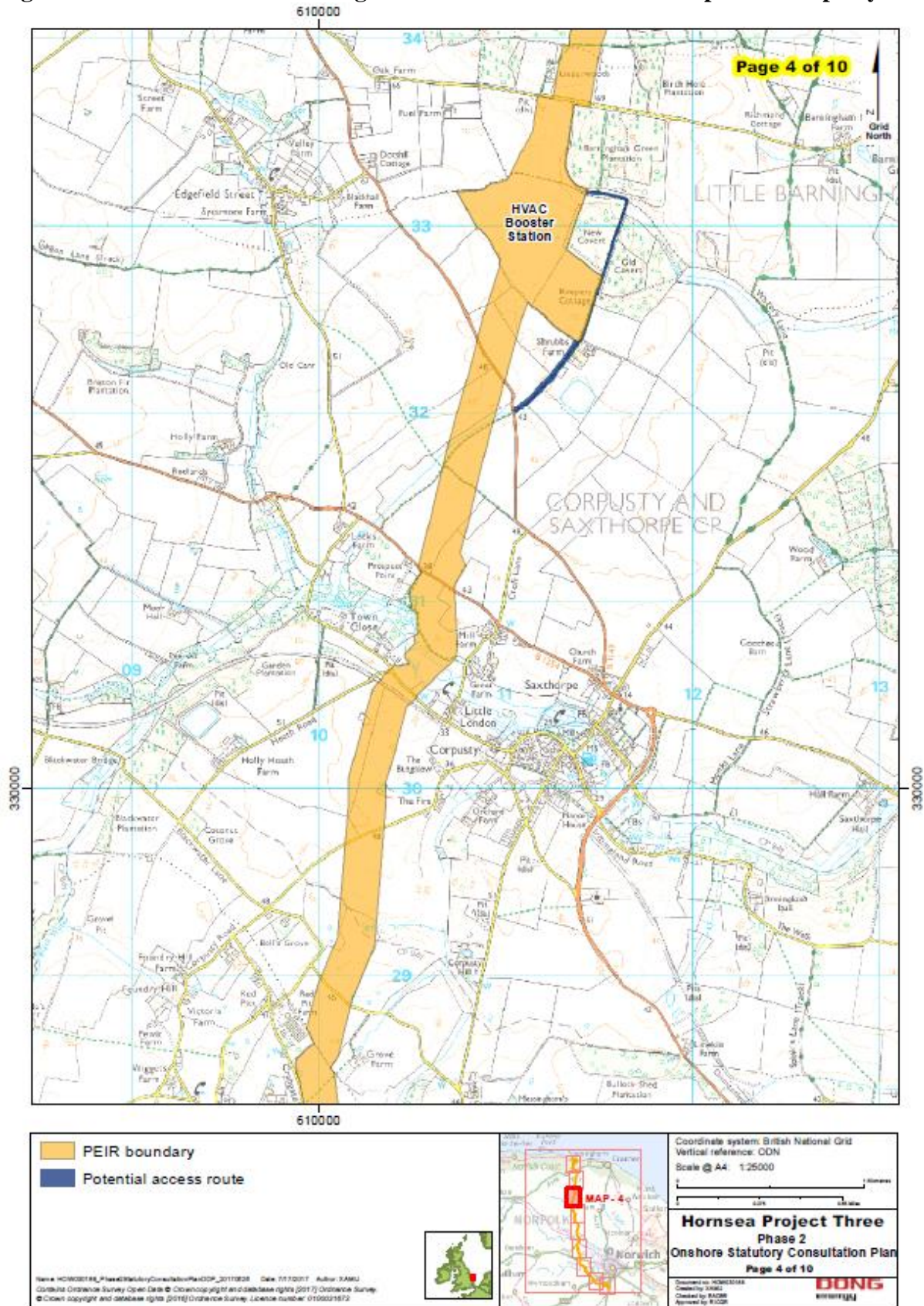
Fig.4 – Onshore from Weybourne to Lower Bodham



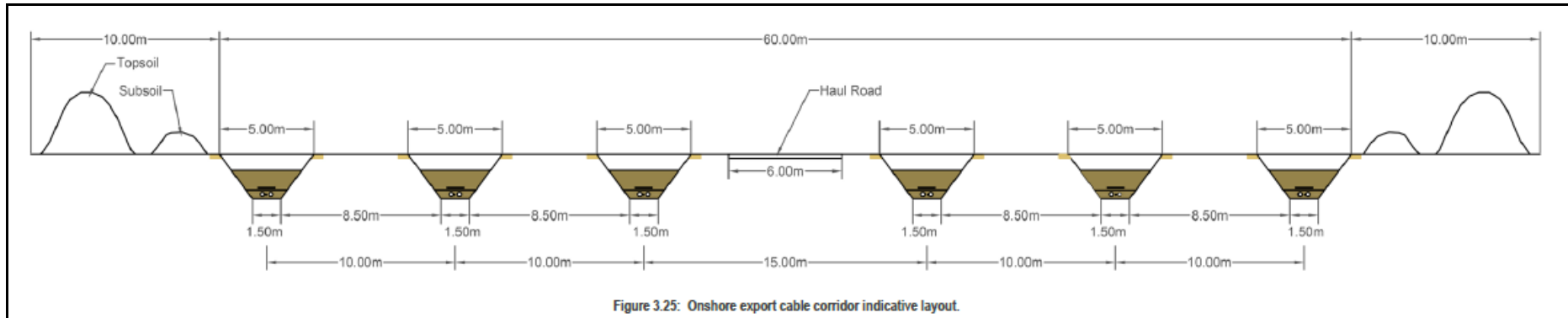
**Fig.5 - Onshore from Lower Bodham to between Edgefield and Plumstead**



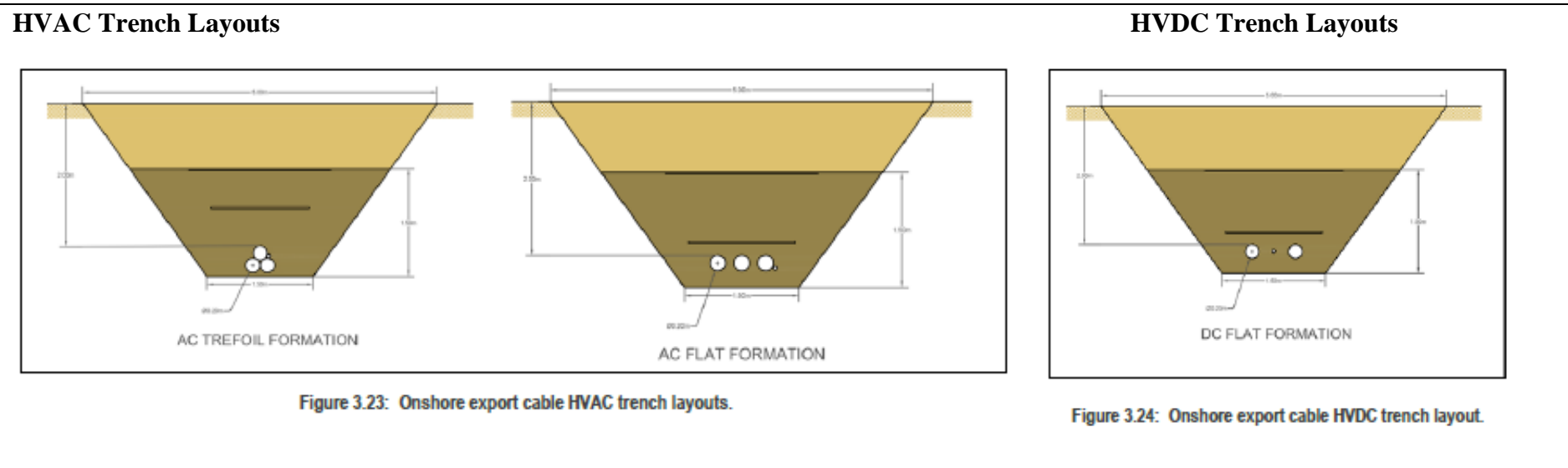
**Fig.6 – Onshore from between Edgefield and Plumstead to Saxthorpe and Corpusty**



**Fig. 7 - Cable Corridor Indicative layout**

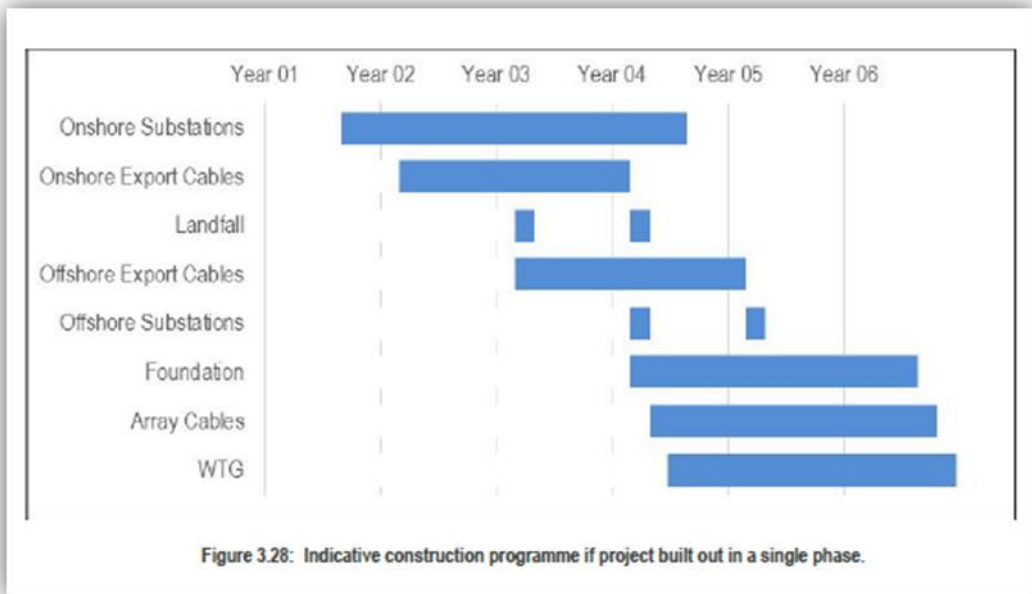


**Fig. 8 – AC and DC Trench profiles**

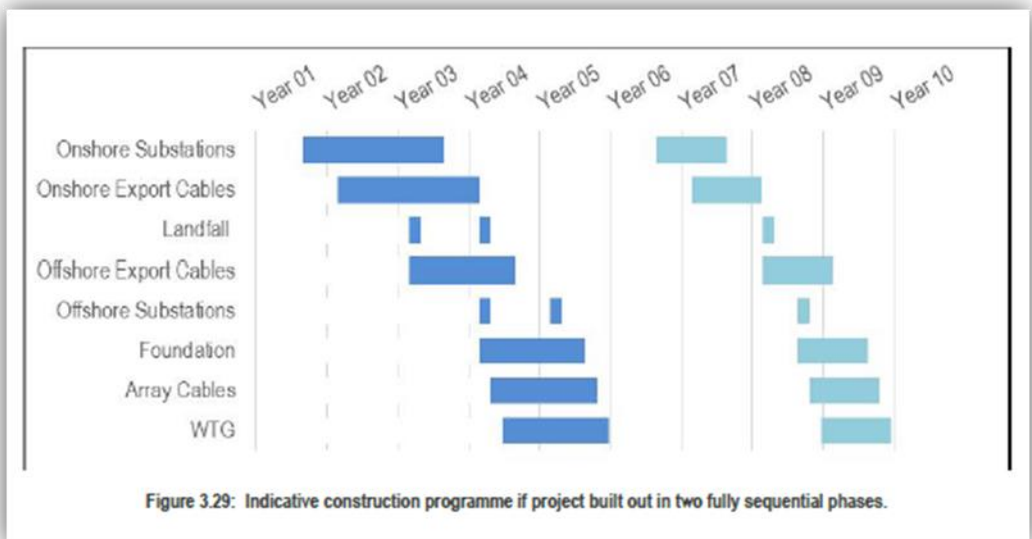


**Fig. 8 – Construction Phasing – One Phase, Two Phases and Three Phases**

One Phase



Two Phases



Three  
Phases

