

# Norfolk Vanguard Offshore Wind Farm

# Consultation Report

## Appendix 25.17 Letter from Breckland District Council

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*Photo: Kentish Flats Offshore Wind Farm*



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Date: 12<sup>th</sup> June 2018

Dear Mr Lean,

**NORFOLK VANGUARD OFFSHORE WIND FARM PEIR CONSULTATION RESPONSE**

I write in reply to your letter to my colleague Philip Mileham dated Monday 14<sup>th</sup> May 2018 regarding the current consultation exercise being carried out under Section 42 of the Planning Act 2008 for the Norfolk Vanguard Offshore Wind Farm project.

I am sending this response on behalf of Breckland Council in my role as Head of Development Management for the district. Land affected by the proposals falls under the jurisdiction of the council and this organisation is therefore a key stakeholder in this consultation process. Please send any correspondence relating to this representation directly to me via the above contact details.

In 2009 the council adopted the Core Strategy and Development Control Policies Document to outline the vision and overall objectives for development in Breckland up to 2026 to set out where development should be focussed. This contains district wide Development Control policies. A revised Local Plan is currently the subject of an Examination in Public by PINS. The purpose of this representation is to inform this future planning decision on the following grounds:

**Principle of Development:**

Policy DC 15 of the adopted local plan confirms that proposals for renewable energy development will be supported in principle. The council welcomes the potential 1.8 GW of capacity for the production of enough fossil-free power every year to meet the equivalent annual electricity demand of 1.3 million UK households. As a local government this organisation is committed to meeting decarbonisation and climate change targets by reducing greenhouse gas emissions. The scheme would help to meet domestic, commercial and industrial energy demands in a sustainable manner and in principle this accords with Policy DC 15.

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Policy DC 15 does however also clarify that the council will support commercial scale renewable energy developments unless the environmental impacts of allowing the proposal would outweigh the wider social, economic and environmental benefits derived from it, the criteria for which is set out in the policy and considered below.

#### The Surrounding Townscape and Landscape:

A key consideration is the impact on the landscape when viewed by the surrounding land occupiers. The council is aware from the February 2018 newsletter issued by Vattenfall that a key design decision has been made to deploy High Voltage Direct Current (HVDC) cable technology to connect Norfolk Vanguard and its sister project Norfolk Boreas to the UK's National Grid.

This has significant implications for the surrounding residents, businesses and visitors to the area. It is confirmed in the non-technical summary of the PEIR that the HDVC electrical solution has been considered for the onshore project as the worst case for the Landscape and Visual Impact Assessment. In comparison to the HVAC alternative the footprint will not change but the structure will be enclosed in taller buildings. This will have a greater visual impact when perceived by the neighbours.

Vattenfall has explained the overall benefits of this approach in terms of it being kinder to the environment and local people. This is not the case for the residents of Necton and the adjacent areas who, in the view of the Local Planning Authority, would be adversely and disproportionately affected. Therefore, in order for this development to be permitted, mitigation will be required as appropriate to minimise any environmental impacts via planning conditions or a legal agreement. Potential mitigation measures vary according to the nature of the installation and the impact of the proposal is now significantly greater for this part of Breckland than it could have been with the alternative.

This is not a case where the proposal involves a modest installation where careful siting may be sufficient or appropriate landscape screening could be used to mask or reduce the impact. It will not be possible to disguise the effect on the landscape following the completion of the development and a robust planting scheme would take many years to bring to fruition. The council notes that Vattenfall has confirmed a commitment to working with local residents and groups to minimise the impact of the construction and the operation. This is to be encouraged and, on the back of Vattenfall's decision to adopt HVDC infrastructure, the council hereby formally requests the creation of a formal Local Liaison Group. The arrangements for this should be drafted by Vattenfall in a contract to be shared with Officers and Elected Members of Breckland Council and Norfolk County Council, the local Member of Parliament, Necton Parish Council, the Necton Substation Action Group and other local residents. This is to be the means of ensuring that the residual impact of the project is a positive one, which is a particular challenge for the Necton area as it would bear the greatest implications of the site selection decision and the HVDC option being deployed.

#### Highway Safety:

Policy DC 15 requires the development to be acceptable in terms of highway safety. CP 13 of the adopted local plan also confirms that new growth in Breckland will be delivered to promote accessibility improvements.

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It is well documented that the construction period will generate a considerable increase in HGV movements. There are particular difficulties with the nature of the junction between the A47 and the access to the Necton local service centre. This is a busy intersection and the Parish Council has counted 2000 movements a day. The local perception is that can be difficult and dangerous to turn at this point, especially during peak times. This view is shared by local Ward Members.

Given the site selection location the local planning authority would also take this opportunity to request that the solution for the problems, which will be exacerbated as a result of the development, should also be considered in more detail by the Liaison Group and Vattenfall must consider investing in the improvement of this junction via a legal agreement.

#### Local amenity as a result of noise, light pollution, flood risk, ecological and archaeological impacts:

A further criterion of Policy DC 15 is the consideration of local amenity. The Local Planning Authority considers that the factors of noise, light pollution, flood risk, ecological and archaeological impacts are all relevant at this stage.

The news that that the use of HVDC cable connections rather than the HVAC alternative will mean a quieter operation, as it will incorporate fewer low-frequency noise emitting components and acoustic insulation, is welcomed.

However, the most sensitive receptors are the land occupiers in the Necton and adjacent areas. The proposed location of the onshore infrastructure and cable relay station is such that residents, businesses and visitors in the area must be assured that mitigation measures will be sufficient. The council appreciates that noise and vibration impacts associated with the construction of the onshore development are being assessed following the guidance within BS 5228:2009+A1:2014 and the potential noise and vibration impacts associated with the operation of Norfolk Vanguard are assessed following the methodology contained in BS 4142:2014. However, there are significant potential impacts both during construction and during operation and the noise sensitive receptors to the noise sources identified in the desk based assessment ought to be included in the Local Liaison Group for further consideration of the continuing robust environmental assessments. Light pollution, flood risk, ecological and archaeological impacts are also matters for that group.

#### Conclusions

In summary Breckland Council is supportive of the principle of the project. However, the most significant impact of the onshore proposal will affect Necton and the adjacent areas. Vattenfall has explained that for the majority of onshore topics the assessments conclude that the project will not result in significant impacts. It is contended that the onshore site selection has resulted in many potential impacts being avoided.

Nevertheless it is acknowledged that potentially significant landscape and visual impacts may arise as a result of the cable relay station and project substation. This is particularly relevant for Necton and the surrounding areas and the concern has been reinforced by the decision to use HDVC rather than the HVAC alternative. Taller enclosures are now inevitable. This will have a disproportionate effect on the neighbouring residents, businesses and visitors to the area. The mitigation measures are key. There are also difficulties with the road junction between the A47

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and the main access to Necton which need to be addressed and further work is required in respect of noise, light pollution, flood risk, ecological and archaeological impacts. Information sharing in respect of ongoing data gathering is critical and the council would urge Vattenfall to establish a Local Liaison Group so the continuing assessments can be updated and any changes resulting from consultation can be incorporated. This is a key means of ensuring that the scheme generates a residual positive impact.

I trust this is of assistance. Should you have any queries about this please do not hesitate to contact me.

Yours sincerely,

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Head of Development Management

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