



Ørsted Energy Balancing Infrastructure (EBI)

Environmental Statement:
Volume 4, Appendix 4.1 – Scoping Opinion

Ørsted

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Mr Rob Edwards
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Our ref 2021/2706

25 January 2022

Dear Mr Edwards

Location: Land East Of Main Road Swardeston Norfolk
Proposal: Environmental Impact Assessment - Scoping Opinion on proposed development of Energy Balancing Infrastructure (EBI) at Hornsea Project Three Offshore Wind Farm Onshore HVDC Converter / HVAC Substation
Applicant: Mr Rob Edwards

I refer to the above scoping request received on 9 December 2021.

The proposal requires an Environmental Impact Assessment on the basis of the screening opinion 2021/2145 in regard to the likely cumulative impact in regard to the Hornsea 3 substation which is subject to an Environmental Statement.

South Norfolk Council has consulted the relevant bodies as required in accordance with the EIA Regulations, and others it considers of relevance. The cumulative list of these is as follows:

- Lead local Flood Authority
- Environment Agency
- Historic England
- Natural England
- Highway Authority (Norfolk County Council)
- Parish Council
- NCC Ecology
- SNC Environmental Quality
- SNC Heritage
- SNC Landscape

Where a Scoping Opinion has been issued by the Council, the Environmental Statement will need to be based on this.

In addition to the provisions set out in Schedule 4 of the Town and Country Planning EIA Regulations 2017 the Environmental Statement (ES) will need to cover the potential impacts of the proposed development. These are repeated below for ease of reference Schedule 4 can be accessed here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/577143/SI-Town_and_Country_Planning.pdf

A statement should also be made on how the report has been compiled by a competent person suitably qualified.

The method of assessment and scope of the environmental statement outlined in your submission are considered to be generally acceptable. However, I have outlined some matters below which we would also want to see incorporated into the ES in addition to those matters already raised in your scoping report.

The site includes 3.2ha of land, which forms part of the red line for the development consent order relating to the substation for Hornsea Three. The key characteristics of the site are the proposed battery facilities which will have a height of 15 m. It is understood that the proposed development is anticipated to include up to two separate EBI compounds. The main components include:

- Containerised battery array and battery transformers;
- 33 kV Switchgear building(s);
- 400 kV transformer within noise enclosure and associated firewall within the northern EBI compound;
- Firewall to batteries within the southern EBI compound;
- Required access (utilising the same access road off the Main Road (B1113) as the Hornsea Three ONCS) and internal roads, drainage systems, perimeter and internal fences; and
- Required external lighting and lightning pylons.

The site is located on grade 2 and 3a agricultural land, however it is acknowledged that this would be lost to some extent as part of the development of the substation. The site is also located within the Norwich Southern Bypass Protection Zone, which is an area designated under Policy DM 4.6 which seeks to protect the openness of the landscape in this area.

Cumulative Effects Assessment

An assessment should be made of the extant consents, current applications and proposed allocations. The scoping opinion report includes a section on relevant planning history at section 2.2. This picks up the requirements in relation to the Hornsea Three Onshore Converter Station. This application is subject to a development consent order and has been the subject of an Environmental Statement. The energy balancing infrastructure is proposed to provide energy storage for energy from the wind farms during times of oversupply, to then be fed into the grid during times of lower supply. There is a clear functional link between the presence of the Hornsea substation and the provision of the energy balancing infrastructure. On this basis the Environmental Statement will be expected to consider the cumulative impact of the two developments.

In addition to the Hornsea Three windfarm it is considered that the information at table 4 represents a reasonable list in terms of cumulative impact. In addition the following applications should also be considered:

Application 2021/2645 for the installation and operation of a Battery Energy Storage System to provide standby emergency electricity for National Grid in times of high electricity demand or when renewable energy projects are unable to fulfil demand. This would be for the installation of 130MW of modular battery units with ancillary equipment,

including power conversion units, 132kV transformer compound, metering cabinet, switchroom, DNO control room and welfare container.

Application 2021/2495 Installation of a solar farm comprising: ground mounted solar panels, access tracks; inverter/transformers, substation; storage, spare parts and welfare cabins, underground cables and conduits, perimeter fence; CCTV equipment, temporary new site entrance and access track, temporary construction compounds, and associated infrastructure and planting scheme. Application is accompanied by an environmental statement.

National Grid East Anglia Green Energy Enablement project

Consultation

Consultation on the proposals should include the following groups:
Local ward members and parish councils

Environmental features likely to be affected by development

The key features and designations near the site can be identified online at www.magic.gov.uk, including:

The above designations and features should be considered throughout each section of the Environmental Statement.

Baseline studies, assessment of effect, mitigation and monitoring

This section of the scoping report identifies the following areas to be covered:

- Construction, operation and decommissioning
- Access and traffic
- Hydrology and flood risks
- Ecology and ornithology
- Landscape and Visual Assessment
- Archaeology and Cultural Heritage
- Noise
- Socio-Economic and Sustainability
- Avoidance and Mitigation
- Residual Impacts

It is considered that these represent a reasonably comprehensive list.

Landscape and Visual Impact

The use of a landscape visual impact assessment to assess the impact of the development upon the landscape is supported. The opportunity to comment on the methodology and proposed viewpoints is welcomed. It is noted as part of paragraph 7.3.3.1 that there are no designated landscapes within the landscape and visual study area and as such these will not be considered further. Whilst this is accepted, paragraph 7.3.3.2 goes on to set out the locally designated landscapes which are protected by policy DM4.6 these should still be considered further as part of the LVIA.

In relation to the viewpoints, this does not appear to make reference to a viewpoint from the A47, which was included in the Hornsea Three ONCS LVIA. This should be included within the assessment. The A47 acts as a key route and impacts how people view the edge of Norwich and the bypass protection zone as protect through DM4.6. I note that you have set out that the site

would not be visible once the woodland planting has matured by 15 years, however it would be expected for the LVIA to show this.

Protected Sites and Ecology

Natural England have reviewed the submitted information and have commented that the proposal is unlikely to adversely impact any European or internationally designated nature conservation sites (including 'habitats sites' under the NPPF) or nationally designated sites (Sites of Special Scientific Interest, National Nature Reserves or Marine Conservation Zones) and that the proposal is unlikely to result in significant effects. They have also noted that they are content that the proposed Energy Balancing Infrastructure will lie entirely within the red line boundary of the Hornsea Three Onshore Converter Station as consented by Development Consent Order in December 2020.

Notwithstanding the above, a robust assessment of environmental impacts and opportunities based on relevant and up to date environmental information should be undertaken prior to a decision on whether to grant planning permission.

As part of their representation Natural England have provided a detailed scope for the Environmental Statement at annex A of their representation. This is available to view as part of the full response on the Councils website under the planning application. Annex A does include a number of key categories it is acknowledged that this is not a site specific response and instead a general response and as such not all categories may be appropriate. It will be necessary to consider biodiversity enhancement and net gain in accordance with the requirements of the NPPF.

Highways

Norfolk County Council as the Highways Authority have reviewed the proposal. It is noted that you have set out that a transport statement will be provided to support the application as an appendix to the Environmental Statement. This approach is considered to be acceptable. Subject to the transport statement substantiating the claims made as part of the Environmental Statement, the Highways Authority have confirmed that they would not foresee an highway objection.

Historic Environment

The proposal has been reviewed by Norfolk County Councils Historic Environment Service, they have confirmed the following:

We have no issues with cultural heritage in terms of below-ground archaeology being scoped out of the EIA in line with what is laid out in the documentation submitted with the application.

Archaeological desk-based assessment and geophysical survey has already been undertaken.

Undesignated heritage assets with archaeological interest (buried archaeological remains) have clearly been identified within the current application site The significance of these remains would be affected by the proposed development.

The harm to the significance of below-ground archaeological remains can be mitigated through a programme of archaeological work secured through appropriately worded conditions on any future planning applications.

Comments have not been received from Historic England at this stage, however noting the position of the site it is considered acceptable that this is scoped out of the EIA.

Health and Safety

The inclusion of a chapter of the ES on accidents and hazards is welcomed, particularly having regard to the public concern which has been raised in relation to this development. In terms of the cumulative effects it is agreed that the Hornsea three ONCS should form a main focus for this element of the assessment.

A representation has been received from the Health and Safety Executive in relation to this scoping opinion. This has noted the presence of a major hazard pipeline within the recognised consultation distance of the site and regard should be had to this in the assessment. Furthermore, there is a further unidentified pipeline within the vicinity of the site reference 4567835_ Cadent Gas Ltd The oaks, Deal Farm AD Plant which regard will also need to be had too.

Amenity including Noise

It is noted that noise impacts have been scoped out of the requirements of the Environmental Statement. This has considered that the noise levels will not exceed that permitted under the Hornsea three DCO. Whilst this approach is acceptable, evidence will need to be provided as part of the planning application to demonstrate this.

From experience the construction phase of a development of this size has the significant potential to have an adverse impact on residents of the area e.g.:

- o Due to noise from the construction operations (particularly from the piling operations), plant movements, construction compound and vehicle movements to and from the site.
- o Due to noise from plant operating at night e.g. generators.
- o We have often found that there is pressure to construct the site as quickly as possible which conflicts with the mitigation of noise from the operation.
 - o Due to dust from the construction work, particularly vehicle movements on site in dry weather.
 - o Due to noise from Lorries delivering materials to the site may have travelled long distances with the result that they can arrive at unsocial hours and in quick succession.
 - o If arrangements are not in place to manage this it can impact residents over a wide area due to lorries parking up on route to the site whilst waiting for it to open, the noise from lorries passing dwellings (particularly at unsocial hours) and lorries queuing to enter the site.

Any demolition / site clearance phase at the end of the life of the proposed EBI would be expected to have a significant potential to have an adverse impact on residents of the area due to noise and dust similar to the construction phase.

The operational phase of EBI has a potential to have an adverse impact on residents of the area due to noise (particularly low frequency noise) from electrical plant (e.g. transformers) if careful consideration is not given to their location relative to dwellings.

It would expect that as part of the planning application these concerns are considered and where possible to address. Ideally this should be done as part of the planning application process to ensure that control measures are practicable, achievable and do not conflict with other matters.

In summary

It is essential with an application of this quantum that the phasing of the development is fully explained within the associated documents. The phasing and delivery of the development and its infrastructure should be factored into the ES assessment with the direct, indirect and secondary effects of the phased delivery, including any temporary and cumulative effects, being fully explored.

I hope that you find the above information useful and please do not hesitate to contact the above case officer on the details listed should you wish to discuss this letter further.

Yours sincerely

Sarah Everard
Principal Planning Officer