

# Hornsea Project One – Deadline 4 Submission



## 1 INTRODUCTION

- 1.1 This document is submitted for Deadline 4 in relation to the Hornsea Project Two Examination, jointly on behalf of Heron Wind Limited ("Heron"), Njord Wind Limited ("Njord") and Via Aura Limited ("Vi Aura"). The three companies are collectively referred to as the "Project One Companies" or "Hornsea Project One".

## 2 RESPONSES TO SECOND QUESTIONS

- 2.1 The response of the Project One Companies to the Examining Authority's Second Questions addressed to, or relevant to, Hornsea Project One are set out below.

### Question G10

**Please explain in the light of the advice on changing and application post acceptance (Guidance for the examination of applications for development consent, March 2015) why the changes to the Order made in respect of (a) the reduction of plot 506 and proportionate increase in plot 505 on Land Plan sheet 27 of 27; and (b) the amendment to the Offshore Works Plans to reflect the reduction in order limits to remove on the Project's export cable route options within the Hornsea Project 1 wind farm array are not being treated as material amendments? (REP3-027)**

**Do any interested parties wish to comment on these two proposed amendments to the Order?**

### Response G10

The proposed amendments to (a) reduce the size of plot 506 so as to remove the overlap with Hornsea Project One's substation area and (b) to reduce the order limits to remove the option for the Hornsea Project Two export cable within Hornsea Project One's wind farm array have been consulted and agreed upon between the Hornsea Project One Companies and Hornsea Project Two Companies. Hornsea Project One support these amendments and do not wish to comment any further on these two proposed amendments to the Order.

### Question LH20

- a) **Has the hedgerows plan for Hornsea Project 1 been signed off by the local authorities?**
- b) **If so, has Hornsea Project 1 undertaken studies to determine which hedgerows to remove?**

- c) **If so, could this information, as has been the case for archaeological information, be used to assist Hornsea Project 2?**
- d) **Has a protocol been agreed between the applicant and the local authorities on (i) relevant criteria for hedgerow removal, and (ii) which hedgerows to remove?**

**Response LH20**

- a) **Has the hedgerows plan for Hornsea Project 1 been signed off by the local authorities?**

Hedgerow removal and reinstatement for Hornsea Project One are covered by the Environmental Management Plan (EMP) and Landscape Management Plan (LMP). There is no specific standalone Hedgerow Plan. Such a plan is not a requirement of our Development Consent Order. The draft LMP (which was submitted as part of the DCO application (Document 7.6.4.16, table 4.1)) set outs the agreed hedgerows that will be removed during the construction of Hornsea Project One. The draft LMP also contained details of the agreed mitigation and enhancement for hedgerows. The local authorities were consulted on the removal of hedgerows and their comments were considered in the drafting of the submitted draft LMP.

An updated EMP and LMP have recently been submitted to North Lincolnshire Council on the 5<sup>th</sup> October 2015 to discharge the requirements of the DCO to enable onshore substation construction to commence in January 2016, and as such have not yet been approved. These documents have only been submitted in relation to the onshore substation site. All hedgerow removal at the onshore substation is currently expected to be in line with the draft LMP which was agreed as part of the Project One Examination.

The EMP and LMP for the cable route construction have not yet been finalised. The EMP and LMP will be updated to include details of the planned hedgerow removal relating to the onshore export cable, this will be submitted to the relevant Local Planning Authorities in July 2016.

- b) **If so, has Hornsea Project 1 undertaken studies to determine which hedgerows to remove?**

An updated Phase One Habitat survey was undertaken in the Spring of 2015. This survey provided updated information on the characteristics of the hedgerows at the onshore substation and the onshore cable route.

The detailed design work for the onshore substation found that hedgerow removal is in line with the proposal sets out in the draft LMP.

Detailed design for the onshore cable route is still underway. It will not be possible to specify exactly which hedgerows will require removal until this work is concluded.

The draft LMP submitted as part of the DCO application (Document 7.6.4.16, table 4.1) for Hornsea Project One sets out the agreed hedgerows that will be removed and the agreed mitigation and enhancement. Any additional hedgerows that require removal due to the detail design process will be added to this table with similar appropriate mitigation and enhancement.

Where possible horizontal directional drilling (HDD) techniques are being used to avoid sensitive assets (e.g. roads, rail) along the cable corridor, where possible each drill will look to include any adjacent hedgerows to avoid them being removed. The number of HDD locations is being finalised in the detail design stage with the cable engineering team.

**c) If so, could this information, as has been the case for the archaeological information, be used to assist Hornsea Project 2?**

Hornsea Project One will share the updated Phase 1 Habitat Surveys with Hornsea Project Two if this is felt to be beneficial, although it is expected that Hornsea Project Two will undertake their own update to Phase 1 Habitat Survey prior to construction.

**d) Has a protocol been agreed between the applicant and the local authorities on (i) relevant criteria for hedgerow removal, and (ii) which hedgerows to remove?**

There is no specific requirement for a hedgerow protocol to be agreed between the applicant and the local authorities. The extent and requirement for hedgerow removal is set out in the EMP and LMP as informed by the requirements which are determined by the detailed design process. The LMP and EMP for the onshore substation is currently being agreed with North Lincolnshire Council. Further definition on the requirements for hedgerow removal along the onshore export cable will be defined in 2016 with a view to the updated EMP and LMP being submitted to the local authorities for agreement in July 2016.

**Question CL21**

**Please advise on the possibility and practicability of a four-way SoCG to progress the securing of cable access routes for all relevant parties to the North Killingholme National Grid Sub-station and outline the mechanisms by which agreement will be secured on the routes and connection to the National Grid from C.Gen, Hornsea Project 1, Hornsea Project 2 and NGET.**

## **Response CL21**

Hornsea Project One have reviewed the response prepared by Hornsea Project Two in regards to this question. Hornsea Project One are in agreement with the summary of the position between C.Gen, Hornsea Project 1, Hornsea Project 2 and NGET which is provided for in their response.

## **Question CS18**

**Given that Hornsea Project One and Two are now under DONG Energy ownership, can both projects be included in the DCO Schedule A, Part 3, Requirement 21?**

## **Response CS18**

Hornsea Project One and Hornsea Project Two, although under common DONG Energy ownership, remain separate and distinct commercial projects. As such it would not be appropriate to seek to impose obligations on Hornsea Project One within the confines of the Applicant's DCO. Hornsea Project One is content that the Protective Provisions will ensure that Hornsea Project One is fully informed of the Project's works prior to their commencement where there could be an interaction between the projects.

Furthermore, the Memorandum of Understanding provided at Schedule 2 to the signed SoCG between the parties submitted to PINS on 10 September 2015, seeks to provide for reciprocal consultation obligations on the respective projects prior to the submission of the relevant pre-construction plans and documentation to the MMO under the terms of their respective DMLs (or draft DMLs in the case of the Project).

In conclusion Hornsea Project One do not think it is appropriate or necessary for Hornsea Project One to be included in the Applicant's DCO Schedule A, Part 3, Requirement 21.

## **Question CS19**

**Given that Hornsea Project 1 have indicated that their project will start in January 2016, when will the offshore cable surveys be completed? Will the surveys be extended to cover Hornsea Project 2 as well?**

## **Response CS19**

Onshore construction for Hornsea Project One is due to start in January 2016 at the onshore substation. In order for Hornsea Project One to discharge our consent requirements in advance of offshore construction commencing it will be necessary for all offshore surveys (including cable surveys) to be completed by 2017. Geophys and geotech surveys were completed on the offshore cable corridor this autumn and the analysis of this survey being progressed. The

geophys and geotech survey recently undertaken was of the whole Hornsea Project One offshore cable corridor, as this corridor is shared by both projects Hornsea Project Two cable corridor was also covered by this survey. The survey was not extended to cover any other part of the Hornsea Project Two area.

### **Question CA 18**

**Does the Protective Provision agreed between the Hornsea Project 1 companies and the applicant cover the agreed rights and protective provisions for the two parties in respect of the construction and use of the proposed joint access road to the Hornsea Project 1 and Hornsea Project 2 transmission stations at Plot Nos. 507 and 509 as shown on Land Plan 27 of 27 Revision: 02 submitted at Deadline 2 (REP-005)? If not can a statement explaining the arrangements that will be in place, and how they are to be secured, be submitted to the ExA?**

### **Response CA18**

Hornsea Project One have reviewed the response prepared by Hornsea Project Two in regards to this question, and are in agreement with the response that has been provided.

Burges Salmon LLP

20 October 2015