

Hornsea Project Three
Offshore Wind Farm



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Statement of Common Ground between Orsted Hornsea Project Three (UK) Ltd. and Norwich City Council

Date: November 2018

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Orsted

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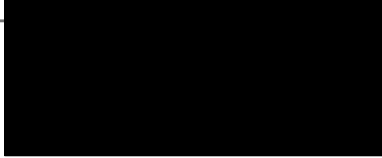
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Front cover picture: Kite surfer near a UK offshore wind farm © Orsted Hornsea Project Three (UK) Ltd., 2018.

Revision History

Version	Date	Author	Context
1	October 2018	Orsted	Initial draft for discussion with Norwich City Council
2	October 2018	Orsted/Norwich City Council	Second draft with inputs from Norwich City Council
3	October 2018	Orsted/Norwich City Council	Third draft following meeting between parties
4	November 2018	Orsted	Final Version for signing

Signatories

Signed	
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Position	Head of Planning Services
For	Norwich City Council

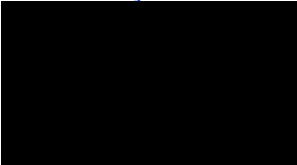
Signed	
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Acronyms

Acronym	Description
DCO	Development Consent Order
CEA	Cumulative Effect Assessment
CoCP	Code of Construction Practice
CTMP	Construction Traffic Management Plan
EIA	Environmental Impact Assessment
Ex.A	Examining Authority
EMP	Ecological Management Plan
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
LMP	Landscape Management Plan
MHWS	Mean High Water Springs
PEIR	Preliminary Environmental Information Report
PRoW	Public Right of Way
SoCG	Statement of Common Ground

1. Introduction

Overview

- 1.1 This Statement of Common Ground (SoCG) has been prepared by Orsted Hornsea Project Three (UK) Ltd. ('the Applicant') and Norwich City Council (together 'the parties') as a means of clearly stating the areas of agreement, and any areas of disagreement, between the two parties in relation to the Development Consent Order (DCO) application for the Hornsea Project Three offshore wind farm (hereafter referred to as 'Hornsea Three'). This SoCG does not deal with or extend to any development other than Hornsea Three.

Approach to SoCG

- 1.2 This SoCG has been developed during the pre-examination phase of Hornsea Three. In accordance with discussions between the parties, the SoCG is focused on issues raised by Norwich City Council within its response to Scoping, Section 42 consultation, pre-application and post-application consultation between the parties.
- 1.3 The structure of this SoCG is as follows:
- Section 1: Introduction;
 - Section 2: Consultation;
 - Section 1: Agreements Log; and
 - Section 4: Summary.
- 1.4 It is the intention that this document will help facilitate post application discussions between the parties and also give the Examining Authority (Ex.A) an early sight of the level of common ground between both parties from the outset of the examination process.

Hornsea Three

- 1.5 Hornsea Three is a proposed offshore wind farm located in the southern North Sea and will include all associated offshore (including up to 300 turbines) and onshore infrastructure.
- 1.6 The key components of Hornsea Three include:
- Turbines and associated foundations;
 - Turbine foundations;
 - Array cables;
 - Offshore substation(s), and platform(s) and associated foundations;
 - Offshore accommodation platform/s and associated foundations;
 - Offshore export cable/s;
 - Offshore and/or onshore High Voltage Alternating Current (HVAC) booster station/s (HVAC transmission option only);
 - Onshore export cables; and
 - Onshore High Voltage Direct Current (HVDC) converter/HVAC substation.

- 1.7 The Hornsea Three array area (i.e. the area in which the turbines are located) is approximately 696 km² and is located approximately 121 km northeast off the Norfolk coast and 160 km east of the Yorkshire coast.
- 1.8 The Hornsea Three offshore cable corridor extends from the North Norfolk coast, offshore in a north-easterly direction to the western and southern boundary of the Hornsea Three array area. The Hornsea Three offshore cable corridor is approximately 163 km in length.
- 1.9 From the Norfolk coast, underground onshore cables will connect the offshore wind farm to an onshore HVDC converter/HVAC substation, which will in turn, connect to an existing National Grid substation. Hornsea Three will connect to the Norwich Main substation, located to the south of Norwich. The Hornsea Three onshore cable corridor is approximately 55 km in length at its fullest extent.

2. Consultation

Application elements within Norwich City Council’s administrative area

- 2.1 All of the works detailed in Part 1 of Schedule 1 of the draft DCO (Document Reference A3.1) are located outside of the administrative area of Norwich City Council. However, the onshore HVDC converter/HVAC substation (Work No. 10) is located approximately 1.4 km to the south of Norwich City.
- 2.2 Based on Norwich City Council’s Relevant Representation, the technical topic of the DCO application of relevance to the Norwich City Council (and therefore considered within this SoCG) is limited to landscape and visual resources. Consultation with Norwich City Council has confirmed that they are satisfied that there would be no impact on heritage assets in our area, thus this SoCG does not address historic environment matters.
- 2.3 In addition, a section is included below where those issues which are general to Hornsea Three are discussed.

Consultation summary

- 2.4 This section briefly summarises the consultation that the Applicant has undertaken with Norwich City Council.

Pre-application

- 2.5 The Applicant has engaged with Norwich City Council on Hornsea Three during the pre-application process, both in terms of informal non-statutory engagement and formal consultation carried out pursuant to section 42 of the Planning Act 2008.
- 2.6 Table 2.1 summarises the consultation undertaken between the parties during the pre-application phase, including consultation through scoping, consultation on the Preliminary Environmental Information Report (PEIR), further section 42 consultation undertaken in November 2017 and the focused section 42 consultation in February 2018.

Post-application

- 2.7 The Applicant has engaged with Norwich City Council in the preparation of this SoCG, including a meeting on 30 October 2018 during the post-application phase.

Table 2.1: Pre-application consultation with Norwich City Council.

Date	Detail
13 March 2016	An introductory meeting to introduce Hornsea Three and the consultation process with local communities to seek their feedback on the proposed approach. The planning process for Nationally Significant Infrastructure Projects and the role of Local Planning Authorities was explained. It was noted that Norwich was likely to be a neighbouring authority; however, may feel indirectly affected by the proposal.

Date	Detail
19 July 2016	<p>During this meeting the Applicant explained that Hornsea Three was likely to connect to Norwich Main National Grid Substation. The Applicant presented Hornsea Three's scoping area. It was noted that the scoping area avoided Norwich City Council's jurisdiction boundary; however, there could be the potential for interactions with Hornsea Three. It was explained that a new substation would be required near to the existing national grid substation to the south of Norwich.</p>
16 November 2016	<p>The Applicant emailed Norwich City Council (Steve Fraser-Lim) to advise that the Scoping Report had been submitted to the Planning Inspectorate and to provide an update on the HVDC converter/HVAC substation and Zone of Theoretical Visibility study and whether Norwich City Council would like a viewpoint to be taken from within Norwich City. Norwich City Council were asked to review the supporting documents and offered a meeting.</p> <p><i>This email was followed up on 20/12/2016 and 30/01/2017, however no response was received.</i></p>
06 February 2017	<p>RPS, on behalf of the Applicant emailed Norwich City Council (Robert Webb) advising that the Applicant was due to undertake a landscape assessment for potential sites for the HVDC converter/HVAC substation and that the Applicant wanted to understand if Norwich City Council had any observations and/or thoughts regarding this assessment.</p> <p>Norwich City Council noted that previously Norwich City Council has advised that it would be unlikely to have strong views on the proposal but would like to have the opportunity to discuss matters as plans evolved.</p>
2017	<p>The Applicant held multiple events in central Norwich as part of its community consultation programme to capture individuals living or working in Norwich that may feel directly or indirectly affected by the proposal. Information was shared with key individuals at the council throughout the pre-application consultation period, including issuing newsletter to the councillors. Norwich City Council was also a deposit point for Application materials during the formal consultation periods, carried out in accordance with section 42 of the Planning Act 2008.</p>

3. Agreements Log

3.1 The following section of this SoCG identifies the level of agreement between the parties for each relevant component of the DCO application (as identified in paragraph 2.1) landward of Mean High Water Springs (MHWS). In order to easily identify whether a matter is “agreed”, “under discussion” or “not agreed”, a colour coding system of green, yellow and orange, respectively, is used in the “final position” column to represent the respective status of discussions.

General

3.2 Table 3.1 below identifies the status of discussions between the parties relating to issues which are project wide.

Table 3.1: General.

Discussion Point	The Applicant's Position	Norwich City Council's Position	Final Position
Need for Hornsea Three	There is a specific need for Hornsea Three to provide renewable energy, which is in line with government policy.	No comment, however for context, the majority of the scheme is a considerable distance from the Administrative Area of Norwich City Council and therefore our comments relate solely to the HVDC Converter and HVAC Substation which is proposed to be located to the south of the A47 and east of the B1113. Norwich City Council do not wish to comment on the other elements of the proposal. Our principal objective is to ensure that any visual impact on the Yare valley from the HVDC Converter and HVAC Substation is appropriately mitigated (see below)	No comment
Adequacy of consultation	Adequate pre-submission consultation activities were undertaken by the Applicant, including engagement with Norwich City Council and the local community.	Agreed	Agreed
Site selection of the onshore HVDC converter/HVAC substation	The sites selected for the onshore HVDC converter/HVAC substation are appropriate based on the information presented within Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (Document Reference A6.1.4).	No comment – this is not of sufficient concern to the Council to justify the resources needed for a fully considered response.	No comment
Transmission System	Inclusion of both HVAC and HVDC transmission systems within the envelope is appropriate to ensure that anticipated changes in available technology and project economics can be accommodated within the Hornsea Three design, and a decision on which transmission type to use will be made during the detailed design phase (post consent).	No comment	No comment

Landscape and Visual Resources

- 3.3 Hornsea Three has the potential to impact upon landscape and visual resources, and these impacts are considered within Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement (APP-076). An Outline Landscape Management Plan (LMP) (APP-181) has been prepared that captures all relevant management and mitigation measures associated with this topic.
- 3.4 Table 3.2 identifies the status of discussions relating to this topic between the parties.

Table 3.2: Landscape and Visual Resources.

Discussion Point	The Applicant's Position	Norwich City Council's Position	Final Position
Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement (APP-076)			
Baseline Environment	<p>Sufficient primary and secondary data, as listed in Section 4.7 of Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement, has been collated to appropriately characterise the baseline environment (in Section 4.8 of the same chapter) to inform the EIA.</p> <p>The characterisation of the baseline has been informed by fieldwork as set out in paragraph 4.6.1.2.</p>	<p>Norwich City Council are satisfied with the baseline characterisation as set out in Volume 3, Chapter 4 of the Environmental Statement.</p>	Agreed
Assessment methodology	<p>The assessment methodology, as outlined in Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement is appropriate. Viewpoints are considered separately below.</p>	<p>Norwich City Council considers the assessment methodology appropriate. Viewpoints are considered separately below.</p>	Agreed

Discussion Point	The Applicant's Position	Norwich City Council's Position	Final Position
	<p>Section 4.7 of Volume 3, Chapter 4: Landscape and Visual Resources (APP-076) and Volume 6, Annex 4.1: Landscape and Visual Impact Assessment (APP-142) of the Environmental Statement describe how the study area was defined. Paragraph 1.1.5.2 of APP-142 confirms that site assessment work informed definition of the study area.</p> <p>The viewpoints selected to provide a representation of views of the onshore HVDC converter/HVAC substation (as set out in Volume 6, Annex 4.5: Photographs Panels, Wirelines and Photomontages of the Environmental Statement, APP-146) are appropriate. The Applicant notes that Norwich City Council were approached in November 2016 to input into the viewpoint selection, but no response was received (see Table 2.1 above).</p> <p>In respect to the Yare River Valley, impacts on this feature were screened out of full assessment within Volume 3, Chapter 4: Landscape and Visual Resources. As such no specific viewpoints from or to this location were identified. The Applicant is confident that the conclusions remain valid, and no significant effects are likely to occur.</p>	<p>Norwich City Council note that there are two additional locations whereby it was considered the development may have effects. These were;</p> <ul style="list-style-type: none"> - Lea Bridges Park, and - Harford Tip; a closed landfill site which is required to be restored to a country park <p>However on further enquiry of these sites it was decided that we would not seek the consideration of any additional viewpoints within the Norwich City Council boundary; it was considered that any views from Lea Bridges Park would likely be intercepted and/or diminished over distance, and that due to uncertainties in timescale relating to public access to Harford Tip, it would be unreasonable for us to insist on its consideration at this point in time. Therefore, Norwich City Council are satisfied with the approach and assessment presented in the ES.</p>	<p>Agreed</p>
<p>Assessment conclusions</p>	<p>The assessment of potential effects from the onshore HVDC converter/HVAC substation on landscape and visual resources in Section 4.11 of Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement is appropriate and accurate given the implementation of the measures adopted as part of Hornsea Three (outlined in Section 4.10 of the same</p>	<p>Norwich City Council note the application of the maximum design scenario and that the assessment has been undertaken on a 'worst case' scenario. Norwich City Council welcome the amendment at paragraph 1.1.1.4 which states that Norwich City Council will be consulted during the preparation of the final</p>	<p>Agreed</p>

Discussion Point	The Applicant's Position	Norwich City Council's Position	Final Position
	<p>chapter).</p> <p>In accordance with the Rochdale envelope approach, the landscape assessment presents conclusions (and associated mitigation) for the maximum design scenario. In respect to landscape, this is considered to be the HVDC scenario which would result in converter station buildings of up to 25 m in height. Under the HVAC scenario, the maximum height of buildings would be up to 15 m in height.</p> <p>The Applicant will continue discussions with South Norfolk Council on the final landscape mitigation planting post-consent (under Requirement 8 of the draft DCO (APP-027)) to ensure it reflects the mitigation necessary for the final design of the onshore HVDC converter/HVAC substation. This will be informed by the decision regarding transmission system as well as other details of the onshore HVDC converter/HVAC substation. These details, including the layout, scale, finished ground levels, external appearance, materials, access and circulation areas, will be submitted to and approved by the relevant planning authority prior to commencement of construction (Requirement 7 of the draft DCO (APP-027)). It is proposed that paragraph 1.1.1.4 of the Outline LMP is amended as follows to reflect that Norwich City Council will be consulted during the preparation of the final LMP (new text shown in underline).</p>	<p>LMP such that we will have visibility of the landscape mitigation proposals as they develop.</p>	

Discussion Point	The Applicant's Position	Norwich City Council's Position	Final Position
	<p>1.1.1.4 <i>“Local planning authorities will be consulted on this Outline LMP after submission of the DCO application and a final LMP will be agreed with them. <u>In respect to the landscaping at the onshore HVDC converter/HVAC substation, proposals will also be developed in consultation with Norwich City Council.</u>”</i></p>		
	<p>The assessment of potential effects from the onshore HVDC converter/HVAC substation on the landscapes of the Yare River Valley within paragraph 4.11.2.70-71 of Volume 3, Chapter 4: Landscape and Visual Resources, supported by Volume 6, Annex 4.3: Extracts from Local Landscape Character Description (APP-143), is appropriate and accurate.</p> <p>Impacts on the Yare River Valley were screened out of full assessment within Volume 3, Chapter 4: Landscape and Visual Resources. The Applicant is confident that the conclusions remain valid, and no significant effects are likely to occur.</p>	<p>Norwich City Council note that there are two additional locations whereby it was considered the development may have effects. These were;</p> <ul style="list-style-type: none"> - Lea Bridges Park, and - Harford Tip; a closed landfill site which is required to be restored to a country park <p>However on further enquiry of these sites it was decided that we would not seek the consideration of any additional viewpoints within the Norwich City Council boundary; it was considered that any views from Lea Bridges Park would likely be intercepted and/or diminished over distance, and that due to uncertainties in timescale relating to public access to Harford Tip, it would be unreasonable for us to insist on its consideration at this point in time. Therefore, Norwich City Council are satisfied with the approach and assessment presented in the ES.</p>	<p>Agreed</p>

Discussion Point	The Applicant's Position	Norwich City Council's Position	Final Position
	<p>No further mitigation, in addition to those embedded measures identified in Section 4.10 of Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement is necessary as a result of the assessment conclusions for the onshore HVDC converter/HVAC substation.</p> <p>See notes above in respect to the Rochdale Envelope approach and landscape mitigation for HVDC compared to HVDC.</p>	<p>Norwich City Council note the application of the maximum design scenario and that the assessment has been undertaken on a 'worst case' scenario. Norwich City Council welcome the amendment at paragraph 1.1.1.4 (as noted in earlier row) which states that Norwich City Council will be consulted during the preparation of the final LMP such that they will have visibility of the landscape mitigation proposals as they develop.</p>	<p>Agreed</p>
<i>Draft Development Consent Order (APP-027)</i>			
<p>Commitments / restrictions</p>	<p>The commitment to produce a Landscape Management Plan (LMP) (Schedule 1, Part 3, Requirement 8 of the draft DCO) (Schedule 1, Part 3, Requirement 8 of the draft DCO), that must be approved by any relevant planning authority prior to the commencement of works is an appropriate control measure for managing the potential effects on landscape and visual resources.</p> <p>The Applicant notes that an Outline Landscape Management Plan (APP-181) was submitted with the Application.</p>	<p>Norwich City Council would support the production of a landscape management plan.</p>	<p>Agreed</p>

Discussion Point	The Applicant's Position	Norwich City Council's Position	Final Position
Outline Management Plans			
Landscape and visual resources management	<p>The commitment, made by the Applicant in response to consultation feedback, to implement sections of the planting at the commencement of construction works on the HVDC converter/HVAC substation site (which could be up to three years ahead of the planned completion of construction), is appropriate. This will maximise the screening provided in the shortest period of time. Areas which will not be pre-planted comprise the connecting points to the onshore cable corridor, and between the permanent footprint and temporary construction site. This is to facilitate the construction works at the site and is appropriate.</p>	<p>Commitment to planting on commencement of construction is supported. If planting could go ahead at earliest opportunity, even prior to commencement where applicable, this would be of particular advantage to strategic screen planting. E.g. adjacent to A47 and other strategic areas.</p>	Agreed
	<p>The Applicant will confirm the final species mix and specification for the HVDC converter/HVAC substation in the final LMP to be prepared prior to the commencement of a given phase. This will be submitted and approved by the relevant planning authority in consultation with Natural England (under Schedule 1, Part 3, Requirement 8 of the draft DCO). It is noted that the mix included within the Outline LMP comprises a range of sizes and consideration will be given to the inclusion broadleaf native trees of the size requested by Norwich City Council in the development of the final LMP.</p> <p>Principles of management and maintenance are set out in the Outline LMP (section 5), furthermore specific measures relevant to maintenance of landscaping are captured in Requirement 9 of the DCO (APP-027).</p>	<p>Establishment maintenance will clearly need to be included within the LMP although this can often be disconnected from actual operations on site; if larger specimen trees are to be planted these will require adequate maintenance provision and a commitment to replant in the event of failure. The inclusion of broadleaf trees will in time mitigate some visual intrusion resulting from the proposals – the extent of any visual intrusion will vary on the substation selection.</p>	Agreed

4. Summary

- 4.1 This SoCG has been developed with Norwich City Council to capture those matters agreed, under discussion and not agreed in relation to landscape and visual resources.
- 4.2 Agreement has been reached on all matters.