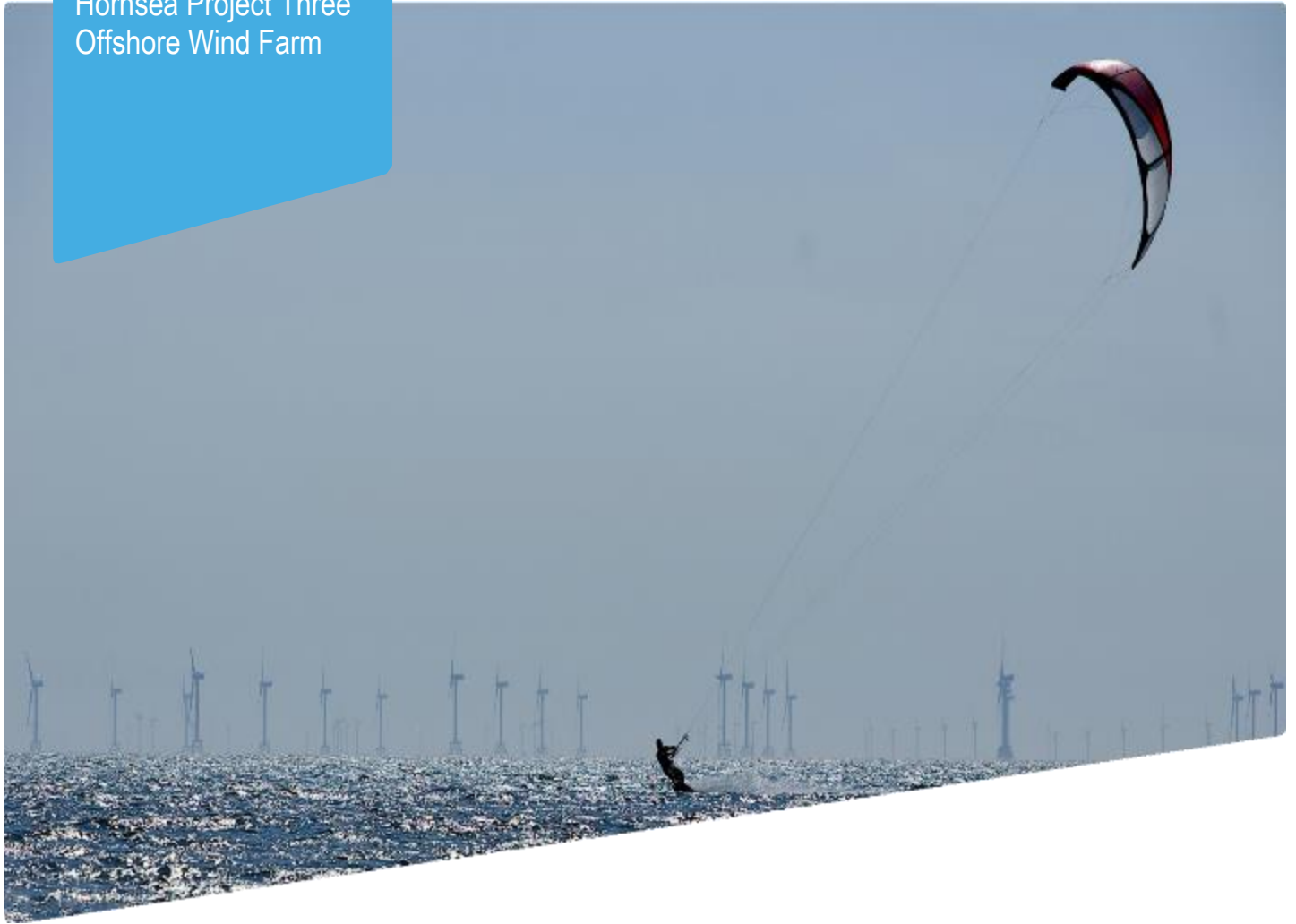


Hornsea Project Three
Offshore Wind Farm



Hornsea Project Three Offshore Wind Farm

Statement of Common Ground between Hornsea Project Three (UK) Ltd. and South Norfolk Council

Date: November 2018


Hornsea 3
Offshore Wind Farm



Statement of Common Ground between Ørsted Hornsea Project Three (UK) Ltd. and South Norfolk Council

Ørsted

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

Revision History

Version	Date	Author	Context
1	August 2018	Ørsted	Pre-examination: Initial draft for discussion with South Norfolk Council
2	October 2018	Ørsted	Pre-examination: Updated draft for discussion with South Norfolk Council
3	November	Ørsted	Final for signing
4	November	Ørsted	Final for submission at Deadline 1

Signatories

Signed	Claire Curtis
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Position	Senior Planning Officer
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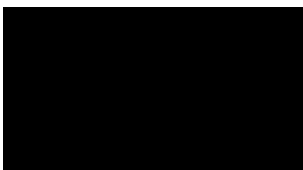
Signed	
Name	Andrew Guyton
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For	Ørsted Hornsea Project Three (UK) Ltd

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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 Directional 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 Ørsted Hornsea Project Three (UK) Ltd. ('the Applicant') and South Norfolk 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 South Norfolk 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 3: 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 National Grid 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 South Norfolk Council’s administrative area

- 2.1 Work Nos. 8, 10 to 12, 14 and 15 detailed in Part 1 of Schedule 1 of the draft DCO (APP-027) describe the elements of Hornsea Three which may affect the interests of South Norfolk Council.
- 2.2 Those technical topics of the DCO application of relevance to the South Norfolk Council (and therefore considered within this SoCG) comprise:
- Landscape and Visual Resources;
 - Historic Environment (Onshore);
 - Noise and Vibration; and
 - Air Quality.
- 2.3 In addition to the technical topics above, a general section is included below where those issue which general to the project are discussed. In consultation with South Norfolk Council, and as agreed during the meeting on 26 June 2018, all other relevant Environmental Statement chapters have been excluded from this SoCG.

Consultation summary

- 2.4 This section briefly summarises the consultation that the Applicant has undertaken with South Norfolk Council.

Pre-application

- 2.5 The Applicant has engaged with South Norfolk 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 Table 2.2 summarises the consultation undertaken between the parties during the post-application phase.

Table 2.1: Pre-application consultation with South Norfolk Council.

Date	Detail
24 March 2016	Hornsea Project Three was introduced to the SNC and agreed the topics upon which the project should engage with the SNC.

Date	Detail
27 September 2016	Meeting to discuss project updates and statutory consultation.
24 October 2016	Meeting to discuss project updates.
18 January 2017	Meeting to discuss project updates and surveys (noise and visual).
24 January 2017	Meeting to discuss project updates and the pre-application phase.
14 June 2017	Meeting to discuss project updates, programme, PEIR, progress of onshore topic assessments and next steps.
13 November 2017	Meeting to discuss project updates, PEIR and S42 consultation responses.
23 January 2018	Meeting with SNC Councillors to discuss project updates, progress of onshore topic assessments, route refinements and next steps.

Table 2.2: Post application consultation with South Norfolk Council.

Date	Detail
15 June 2018	Meeting to discuss project updates, the DCO application and next steps.
01 October 2018	Meeting to discuss examination process and Statement of Common Ground
06 November 2018	Phone meeting to discuss the Statement of Common Ground

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 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	South Norfolk Council's Position	Final Position
Need for renewable energy	There is a specific need to provide renewable energy, which is in line with government policy.	South Norfolk Council agrees with this statement	Agreed
Adequacy of consultation	Proper pre-submission consultation activities were undertaken by the Applicant, including engagement with South Norfolk Council and the local community.	South Norfolk Council agrees with this statement	Agreed
Site selection and route refinement	The process outlined in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (APP-059) has properly considered the alternatives for the relevant elements of Hornsea Three (paragraph 2.1). Furthermore, the site selected for the onshore HVDC converter/HVAC substation is appropriate based on the information presented within Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement.	South Norfolk Council appreciates why the site was selected and the process, however the Council was not involved in nor did it have any influence in the final selected site.	Agreed
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).	South Norfolk Council considers that the substation should be constructed using technologies that would allow for its height to be kept as low as possible. Therefore, there is a preference for HVAC with a maximum height of 15 metres.	Not Agreed - Both parties position on this point is final

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
DCO Requirements	The commitment to produce a final Landscape Management Plan (LMP) (Schedule 1, Part 3, Requirement 8 of the draft DCO APP-027), an Ecological Management Plan (EMP) (Schedule 1, Part 3, Requirement 10 of the draft DCO), and a Code of Construction Practice (CoCP) (Schedule 1, Part 3, Requirement 17 of the draft DCO), that must be developed in accordance with the Outline LMP (APP-181), Outline EMP (APP-180) and Outline CoCP (APP-179), and approved by the relevant planning authority prior to the commencement of works is appropriate.	South Norfolk Council does not have any specific concerns and appreciates that the exact wording of the listed documentation/conditions will be subject to further discussion.	Agreed

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	South Norfolk Council's Position	Final Position
Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement (APP-076)			
Planning and Policy	<p>Section 4.4 of Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement (APP-076) has identified all appropriate plans and policies relevant to landscape and visual resources in the application area and has given due regard to them within the assessments.</p> <p>Although not specifically listed within Section 4.4, consideration was given to Policy DM4.8: Protection of Trees and Hedgerows within the design of Hornsea Three, as well as the assessment presented within Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement. The implications of this policy are described in the relevant assessment methodology and conclusion sections below.</p> <p>As noted in the assessment methodology section below, the assessment has been undertaken based on a maximum design scenario of removal of all trees and hedgerows (which could be of high value) in all areas where HDD is not proposed, or specific protective measures are not identified within the Outline EMP. The Applicant will submit information which clarifies the classification of hedgerows, and identifies individual tree locations as Appendix 38 to the Applicant's response to Deadline 1.</p> <p>Notwithstanding this, the Applicant is committed to continuing engagement with SNC and is confident that a position can be reached whereby SNC is provided with sufficient information on</p>	<p>South Norfolk Council is unclear as to how consideration can have been given to DM4.8 as information about the existing trees and hedgerows has only been available since October 2018. Furthermore, the information made available to the Council does not provide the comprehensive information expected and as such it is not possible to understand, or make an informed judgement on, the full implications of the proposed scheme.</p>	<p>Under discussion</p>

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
	which they can form a judgement on the implications of the authorised development.		
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 to inform the EIA.</p> <p>The future baseline identified to inform the EIA in Section 4.7.7 of Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement is considered appropriate.</p>	South Norfolk Council has no specific points to raise.	Agreed
Assessment methodology	<p>The assessment methodology, as outlined in Volume 3, Chapter 4: Landscape and Visual Resources and Volume 6, Annex 4.1: Landscape and Visual Impact Assessment Methodology of the Environmental Statement (APP-142) is appropriate. This includes:</p> <ul style="list-style-type: none"> • the potential impacts identified in Section 4.11 the maximum design parameters for assessment as listed in Section 4.8 of Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement; • the locations and methodology used to prepare the visualisations (wireframes and photomontages), as set out in Appendix A of Volume 6, Annex 4.1: Landscape and Visual Impact Assessment Methodology (APP-142) and Volume 6, Annex 4.5: Photographs, Wirelines and Photomontages (APP-146) of the Environmental Statement; • the methodology for assessing effects on residential visual amenity as set out in Appendix B of Volume 6, 	<p>Generally agreed, but South Norfolk Council considers that the potential impacts cannot have been fully assessed without the benefit of the tree and hedgerow information that has recently been submitted.</p> <p>If additional information is received, as has been requested, we will assess this before the December Hearing.</p>	Under discussion

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
	<p>Annex 4.1: Landscape and Visual Impact Assessment Methodology (APP-142) and Volume 6, Annex 4.6: Residential Visual Amenity (APP-147) of the Environmental Statement; and</p> <ul style="list-style-type: none"> the list of projects scoped into the CEA in Section 4.12.1. <p>The assessment methodology in respect to impacts on hedgerows and trees currently assumes a maximum design scenario of removal in all areas where HDD is not proposed, or specific protective measures are not identified within the Outline EMP (APP-180) (i.e. as done for retained habitats of ecology and nature conservation concern, paragraph 4.2.2). This approach is appropriate and provides SNC with sufficient comfort that impacts on hedgerows and trees identified under the maximum design scenario have been considered and where appropriate, suitable mitigation is captured within the Outline CoCP (APP-179), Outline EMP (APP-180) and Outline LMP (APP-181).</p> <p>The Applicant's discussions with SNC are ongoing in respect to Important Hedgerow and/or valuable trees and the Applicant is confident that a position will be reached whereby SNC is provided with sufficient information on which they can form a judgement on the implications of the authorised development.</p>		
Assessment conclusions	<p>The assessment of potential effects 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 Volume 3,</p>	<p>South Norfolk Council does not necessarily disagree but requires the outstanding information and assessment of the trees and hedgerows before committing fully.</p>	<p>Under discussion</p>

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
	<p>Chapter 4: Landscape and Visual Resources of the Environmental Statement (APP-076)).</p> <p>This assessment is based on a maximum design scenario of the HVDC converter/HVAC substation as set out in Table 4.8 of the same chapter, which includes a maximum height of building/equipment of 25 m across the permanent area of the site.</p> <p>The Applicant's discussions with SNC are ongoing in respect to Important Hedgerow and/or valuable trees and the Applicant is confident that a position will be reached whereby SNC is provided with sufficient information on which they can form a judgement on the implications of the authorised development.</p>		
	<p>The assessment of effects on the Norwich Southern Bypass Landscape Protection Zone along the A47, as well as the proposed mitigation (in the form of landscape planting), is appropriate.</p> <p>The Applicant will continue discussions with SNC 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 (to be approved under Requirement 7 of the draft DCO). This will enable the design to maintain the openness of the bypass protection zone as far as possible, as well as mitigate landscape and visual effects and promote good design.</p> <p>In response to engagement with SNC, the Applicant has sought to undertake baseline photography from vantage points along the A47. This work is due to be undertaken in November 2018</p>	<p>South Norfolk Council ideally would have liked to have further viewpoint(s) information from the A47 itself. Whilst it is acknowledged that this is not straightforward, the Council has a previous example of a pre-application for a site within the Norwich Southern Bypass Protection Zone where visualisations were produced from vantage points along the A47.</p>	<p>Under discussion</p>

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
	(subject to access agreements with Highways England) and as such visualisations will be submitted to SNC and the Examination shortly.		
	<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, the Outline LMP (APP-181) and the Outline CoCP (APP-179) are necessary as a result of the assessment conclusions.</p> <p>The Applicant has committed to removing temporary construction compound, storage areas and accesses as work progresses and they are no longer required. Following completion of this, the working area will be reinstated to a condition commensurate with condition prior to the commencement of works. This commitment is captured in section 4.1.6 the Outline CoCP (APP-179). The Applicant will continue to engage with SNC to ensure this commitment sufficiently addresses their concerns.</p>	<p>Notwithstanding the outstanding information, South Norfolk Council considers that this is generally acceptable, however it may be necessary to adjust and enhance the proposals in light of any additional information. Furthermore, the Outline LMP does not currently cover land currently used temporarily for construction purposes only.</p>	Under discussion
	The assessment of potential cumulative effects in Section 4.13 of Volume 3, Chapter 4: Landscape and Visual Resources of the Environmental Statement (APP-076) is appropriate and accurate.	South Norfolk Council agrees with this statement	Agreed
	The assessment of effects on residential visual amenity in Section 4.14 of Volume 3, Chapter 4: Landscape and Visual Resources (APP_076), and Volume 6, Annex 4.6: Residential Visual Amenity (APP-147) of the Environmental Statement is appropriate and accurate.	In relation to purely residential amenity, South Norfolk Council do not disagree.	Agreed

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
Draft Development Consent Order			
Requirements	The requirement to produce a Landscape Management Plan (LMP) (Schedule 1, Part 3, Requirement 8 of the draft DCO) that must be approved by any relevant planning authority (including South Norfolk Council) prior to the commencement of works, and the maintenance of the landscaping planting (Schedule 1, Part 3, Requirement 9 of the draft DCO) are appropriate control measures for managing the potential effects on landscape and visual resources.	South Norfolk Council agrees with this statement. Appropriate management plan to include retention of trees and hedges identified.	Agreed
	The requirement to agree details including the layout, scale, finished ground levels, external appearance, materials, access and circulation areas, and timetables for the landscaping works at the onshore HVDC converter/HVAC substation will be submitted to and approved by the relevant planning authority prior to commencement of construction (Schedule 1, Part 3, Requirement 7 of the draft DCO).	South Norfolk Council agrees with this statement	Agreed
Outline Management Plans			
Landscape and visual resources management	The management measures described to minimise impacts on landscape and visual resources in the Outline LMP (APP-181), and Outline CoCP (APP-179) are appropriate. Further details will be provided in the final LMP and CoCP.	South Norfolk Council has no specific issues with the general principles of this statement	Agreed
	The need for and timing of the optional strategic planting within the edges of fields adjacent to residential properties to the south west and south east of the HVDC converter/HVAC substation, as	South Norfolk Council does not consider it appropriate to take a view on this matter of detail / personal preference for the resident. South	Not within SNC remit

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
	<p>detailed in the Outline LMP (APP-181) will be agreed with the SNC as part of the final LMP.</p> <p>The indicative landscape planting proposed at the onshore HVDC converter/HVAC substation, including the proposed species mix and specification, as shown in Appendix A of the Outline LMP (A8.7) is appropriate and integrates the proposals into the landscape context. Further details of the mitigation planting will be provided in the final LMP to be developed in consultation with the relevant local authorities' post-consent (under Schedule 1, Part 3, Requirement 8 of the draft DCO (APP_027, see below).</p> <p>Since the point of application, the Applicant has committed to planting sections of the landscape planting at the commencement of works at the onshore HVDC converter/HVAC substation, which could be up to three years ahead of the planned completion of construction works, in order to maximise the screening provided in the shortest period of time. It is therefore proposed to add the following wording at newly created paragraph 3.1.3.4 of the Outline LMP (APP-181):</p> <p><u>“3.1.3.4 Hornsea Three has committed to implementing sections of the mitigation planting at the commencement of works at the onshore HVDC converter/HVAC substation, which could be up to three years ahead of the planned completion of construction works, in order to maximise the screening provided in the shortest period of time. Areas which will not be pre-planted comprise planting to the north-west and south-east of the permanent HVDC converter/HVAC substation (where it connects to the onshore</u></p>	<p>Norfolk Council consider that it is best resolved between the parties directly.</p> <p>South Norfolk Council agrees with this statement</p>	<p style="background-color: #d3d3d3;"> </p> <p style="background-color: #90ee90; text-align: center;">Agreed</p>

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
	<p><u>cable corridor), a 5 m buffer around the permanent site and between the permanent footprint and temporary construction site. These areas will not be pre-planted to facilitate the construction works at the site. Further details of the pre-planting to be undertaken at the onshore HVDC converter/HVAC substation will be provided in the final LMP which will be submitted and agreed with the relevant local planning authorities"</u></p>		

Historic Environment

- 3.5 Hornsea Three has the potential to impact upon the historic environment, and these impacts are considered within Volume 3, Chapter 5: Historic Environment of the Environmental Statement (APP-077). An Outline Code of Construction Practice (Outline CoCP) (APP-179) has been prepared that captures all relevant management and mitigation measures associated with this topic.
- 3.6 Table 3.3 identifies the status of discussions relating to this topic between the parties.

Table 3.3: Historic Environment.

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
Volume 3, Chapter 5: Historic Environment of the Environmental Statement (APP-077)			
Planning and Policy	Section 5.4 of Volume 3, Chapter 5: Historic Environment (APP-077) of the Environmental Statement has identified all appropriate plans and policies relevant to the historic environment in the application area and has given due regard to them within the assessments.	South Norfolk Council agrees with these statements	Agreed
Baseline Environment	Sufficient primary and secondary data, as listed in Section 5.7 of Volume 3, Chapter 5: Historic Environment of the Environmental Statement, has been collated to appropriately characterise the baseline environment to inform the EIA.		
	The future baseline identified to inform the EIA in Section 5.7.5 of Volume 3, Chapter 5: Historic Environment of the Environmental Statement is considered appropriate.		
Assessment methodology	<p>The assessment methodology, as outlined in Volume 3, Chapter 5: Historic Environment of the Environmental Statement (APP-077) is appropriate. This includes:</p> <ul style="list-style-type: none"> • the potential impacts identified in Section 5.11; • the maximum design scenarios identified for each impact; • the locations and methodology used to prepare the visualisations (wireframes and photomontages), as set out in as set out in Volume 6, Annex 5.7: Historic Environment Visualisations (APP-155); and • the list of projects screened into the CEA in Section 5.12.2. 		

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
Assessment conclusions	<p>With the exception of Keswick Hall and its associated parkland (which is addressed separately below), the assessment of potential effects on the historic environment in Section 5.11 of Volume 3, Chapter 5: Historic Environment of the Environmental Statement (APP-077) is appropriate and accurate given the implementation of the measures adopted as part of Hornsea Three (outlined in Section 5.10 of Volume 3, Chapter 5: Historic Environment of the Environmental Statement). No further mitigation to those embedded measures identified in Section 5.10 of Volume 5: Historic Environment of the Environmental Statement (APP-077) and the Outline CoCP (APP-179) are necessary.</p>	<p>South Norfolk Council agrees with this statement</p>	<p>Agreed</p>

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
	<p>The sensitivity of Keswick Hall, as assessed in paragraph 5.11.1.98 Volume 3, Chapter 5: Historic Environment of the Environmental Statement (APP-077) as medium sensitivity (taking into account that setting makes a significant contribution to the sensitivity of the designated asset in that it retains its parkland setting), is considered appropriate.</p> <p>The magnitude of impact as reported in paragraphs 5.11.1.93 to 5.11.1.95 Volume 3, Chapter 5: Historic Environment of the Environmental Statement (APP-077) is minor and the significance of effect is reported as minor adverse. The Applicant will continue discussions with SNC to seek to reach agreement on the predicted magnitude of impact and significance of effect on the designated asset and its setting. Notwithstanding these discussions, the proposed mitigation as set out in Table 5.13 of Volume 3, Chapter 5: Historic Environment of the Environmental Statement (APP-077) and the commitment, under Requirement 7 of the draft DCO (APP-027), to submit details including the layout, scale, finished ground levels, external appearance, materials, access and circulation areas, and timetables for the landscaping works at the HVDC converter/HVAC substation for approval SNC prior to commencement of construction is appropriate.</p>	<p>South Norfolk Council agrees with the first paragraph.</p> <p>South Norfolk Council disagrees with this statement with regard to the magnitude of impact being minor adverse. South Norfolk Council considers that the magnitude of impact would be moderate as the construction of buildings will have a significant adverse impact on key views from the listed building across the associated historic parkland. Thus the change within the setting will lead to some loss of significance of Keswick Hall within its historic parkland.</p>	<p style="text-align: center;">Under Discussion</p>

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
	<p>The assessment of potential cumulative impacts on the historic environment in Section 5.13 of Volume 3, Chapter 5: Historic Environment of the Environmental Statement is appropriate and accurate.</p>	<p>South Norfolk Council disagrees with this statement. The historic parkland of Keswick Hall should be identified and assessed separately from the hall as an undesignated asset with significance as an historic parkland of regional significance. The construction of buildings will have a moderate adverse impact on the setting of the undesignated parkland through visual change to a key aspect of historic landscape.</p>	<p style="text-align: center;">Under discussion</p>
Draft Development Consent Order			
Requirements	<p>The commitment to produce a CoCP (Schedule 1, Part 3, Requirement 17 of the draft DCO (APP-027)), that must be approved by relevant planning authority prior to the commencement of works are appropriate control measures for managing the potential effects on the settings of heritage assets during construction.</p>	<p>South Norfolk Council agrees with this statement</p>	<p style="text-align: center;">Agreed</p>
	<p>The requirement to produce a Landscape Management Plan (LMP) (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, and the maintenance of the landscaping planting (Schedule 1, Part 3, Requirement 9 of the draft DCO) are appropriate control measures for managing the potential effects on the settings of heritage assets during the operational and maintenance phase.</p>	<p>South Norfolk Council agrees with this statement but maintains its view that the height of the substation should be reduced to a height of 15 metres through the use of HVAC technology.</p>	<p style="text-align: center;">Under Discussion</p>

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
	The commitment, under Requirement 7 of the draft DCO (APP_027), to submit details including the layout, scale, finished ground levels, external appearance, materials, access and circulation areas, and timetables for the landscaping works at the HVDC converter/HVAC substation for approval SNC prior to commencement of construction is appropriate.	South Norfolk Council agrees with this statement	Agreed
<i>Outline Management Plans</i>			
Historic Environment management	The management measures described to minimise impacts on the settings of heritage assets in the Outline LMP (APP-181) and Outline CoCP (APP-179) are appropriate. Further details will be provided in the LMP and CoCP post-consent.	South Norfolk Council agrees with this statement but maintains its view that the height of the substation should be reduced to a height of 15 metres through the use of HVAC technology.	Under Discussion

Noise and Vibration

- 3.7 Hornsea Three has the potential to impact upon noise and vibration, and these impacts are considered within Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement (APP-080). An Outline Code of Construction Practice (Outline CoCP) has been prepared that captures all relevant management and mitigation measures associated with this topic.
- 3.8 Table 3.4 identifies the status of discussions relating to this topic between the parties.

Table 3.4: Noise and vibration.

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement (APP-080)			
Planning and Policy	Section 8.4 of Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement has identified all appropriate plans and policies relevant to the historic environment in the application area and has given due regard to them within the assessments.	South Norfolk Council does not disagree with these statements.	Agreed
Baseline Environment	Sufficient primary and secondary data, as listed in Section 8.6 of Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement, has been collated to appropriately characterise the baseline environment to inform the EIA.		
	The future baseline identified to inform the EIA in Section 8.7.3 of Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement is considered appropriate.		
Assessment methodology	<p>The assessment methodology, as outlined in Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement is appropriate. This includes:</p> <ul style="list-style-type: none"> • the potential impacts identified in Section 8.11; • the maximum design scenarios identified for each impact; and • the list of projects screened into the CEA in Section 8.13. 		

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
Assessment conclusions	The assessment of potential effects on noise and vibration in Section 8.12 of Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement is appropriate and accurate given the implementation of the measures adopted as part of Hornsea Three (outlined in Section 8.11 of Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement (APP-080)).	South Norfolk Council does not disagree with these statements.	Agreed
	No further mitigation to those embedded measures identified in Section 8.11 of Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement the Outline CoCP (APP-179) are necessary.		
	The assessment of potential cumulative effects on noise and vibration in Section 8.14 of Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement (APP-080) is appropriate and accurate.		
<i>Draft Development Consent Order</i>			
Commitments / restrictions	The commitment to produce a CoCP (Schedule 1, Part 3, Requirement 17 of the draft DCO (APP-027)), that must be approved by relevant planning authority (including South Norfolk Council) prior to the commencement of works are appropriate control measures for managing the potential effects of noise and vibration. The CoCP will include all relevant embedded measures cited within Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement, as well as the and Outline CoCP (APP-027).	South Norfolk Council does not disagree and appreciates that the exact wording of the listed documentation/conditions will be subject to further discussion.	Agreed

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
	The requirement to produce a Noise Management Plan for the onshore HVDC converter/HVAC substation (Work No. 10) (Schedule 1, Part 3, Requirement 21), that must be approved by relevant planning authority (including South Norfolk Council) prior to commencement of licenced activities landward of MHWS, is appropriate.	South Norfolk Council does not disagree and appreciates that the exact wording of the listed documentation/conditions will be subject to further discussion.	Agreed
<i>Outline Management Plans</i>			
Noise and Vibration management	The management measures described to minimise impacts on noise and vibration during the construction phase in the Outline CoCP (APP-027) are appropriate.	South Norfolk Council does not disagree and appreciates that the exact wording of the listed documentation/conditions will be subject to further discussion.	Agreed

Air Quality

- 3.9 Hornsea Three has the potential to impact upon air quality, and these impacts are considered within Volume 3, Chapter 9: Air Quality of the Environmental Statement (APP-081). An Outline Code of Construction Practice (Outline CoCP) (APP-179) has been prepared that captures all relevant management and mitigation measures associated with this topic.
- 3.10 Table 3.4 identifies the status of discussions relating to this topic between the parties.

Table 3.5: Air Quality.

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
Volume 3, Chapter 9: Air Quality (APP-081)			
Planning and Policy	Section 9.4 of Volume 3, Chapter 9: Air Quality of the Environmental Statement has identified all appropriate plans and policies relevant to the historic environment in the application area and has given due regard to them within the assessments.	South Norfolk Council does not disagree with these statements.	Agreed
Baseline Environment	Sufficient primary and secondary data, as listed in Section 9.6 of Volume 3, Chapter 9: Air Quality of the Environmental Statement, has been collated to appropriately characterise the baseline environment to inform the EIA.		
	The future baseline identified to inform the EIA in Section 9.7.4 of Volume 3, Chapter 9: Air Quality of the Environmental Statement is considered appropriate.		
Assessment methodology	The assessment methodology, as outlined in Section 9.7.4 of Volume 3, Chapter 9: Air Quality of the Environmental Statement is appropriate. This includes: <ul style="list-style-type: none"> • the potential impacts identified in Section 9.10; • the maximum design scenarios identified for each impact; and • the list of projects screened into the CEA in Section 9.12. 		

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
Assessment conclusions	The assessment of potential effects on air quality in Section 8.11 of Volume 3, Chapter 9: Air Quality of the Environmental Statement is appropriate and accurate given the implementation of the measures adopted as part of Hornsea Three (outlined in Section 9.10 of Volume 3, Chapter 9: Air Quality of the Environmental Statement).	South Norfolk Council does not disagree with these statements.	Agreed
	No further mitigation to those embedded measures identified in Section 9.10 of Volume 3, Chapter 9: Air Quality of the Environmental Statement (APP_081) the Outline CoCP (APP-179) are necessary.		
	The assessment of potential cumulative impacts on air quality in Section 9.13 of Volume 3, Chapter 9: Air Quality of the Environmental Statement (APP_081) is appropriate and accurate.		

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
<i>Draft Development Consent Order</i>			
Commitments / restrictions	<p>The commitment to produce a CoCP (Schedule 1, Part 3, Requirement 17 of the draft DCO (APP-027)), that must be approved by relevant planning authority (including South Norfolk Council) prior to the commencement of works are appropriate control measures for managing the potential effects on air quality. The CoCP will include all relevant embedded measures cited within Volume 3, Chapter 9: Air Quality of the Environmental Statement, as well as the Outline CoCP (APP-179).</p> <p>In particular the detailed CoCP(s) will provide further details of hours of operation, siting of standby generators, good practice procedures, movements and storage of construction waste, measures associated with emissions (including dust), telecommunication interference, lighting and decommissioning in accordance with SNDC's relevant representation. A communication plan will also be developed as part of the detailed CoCP, managed and implemented by Hornsea Three to provide prior notification of construction activities.</p>	South Norfolk Council does not disagree and appreciates that the exact wording of the listed documentation/conditions will be subject to further discussion.	Agreed
<i>Outline Management Plans</i>			
Air Quality management	The management measures described to minimise impacts on air quality during the construction phase in the Outline CoCP (APP-179) are appropriate. Further details will be provided in the CoCP post-consent.	South Norfolk Council does not disagree and appreciates that the exact wording of the listed documentation/conditions will be subject to further discussion.	Agreed

4. Summary

- 4.1 This SoCG has been developed with South Norfolk Council to capture those matters agreed, under discussion and not agreed in relation to landscape and visual resources, historic environment, noise and vibration, and air quality.
- 4.2 At this point in time, the primary areas of interest for South Norfolk Council and areas still under discussion can be summarised as follows:
- Potential impacts on landscape and visual receptors, as well as heritage assets, as a result of the onshore HVDC converter/HVAC substation. In this regard, SNC expressed a preference for the use of HVAC transmission technology which would result in a lower maximum height of the onshore HVDC converter/HVAC substation of 15 m; and
 - Potential impacts on landscape and visual receptors as a result of hedgerow and tree removal along the onshore cable corridor.
- 4.3 These areas of interest, amongst others, are addressed in Section 3 above.
- 4.4 The Applicant and SNC agreed that the requirements included within the draft DCO (APP-027), in particular: Schedule 1, Part 3, Requirement 7: Detailed Design Approval onshore; Requirement 8: Provision of Landscaping; and Requirement 17: Code of Construction Practice, are sufficient mechanisms through which impacts from Hornsea Three can be controlled and managed.