

Hornsea Project Three  
Offshore Wind Farm



## Hornsea Project Three Offshore Wind Farm

Applicant's Comments to Norfolk County Council Local Impact  
Report submitted at Deadline 1

Date: 21<sup>st</sup> November 2018

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

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## 1. Introduction

1.1 Norfolk County Council have submitted a Local Impact Report at Deadline 1 (REP1-061) providing a summary of their position on various matters including:

- Electricity Supply Issues
- Socio-Economic Issues
- Wider Community Issues and Impact on business
- Commercial Fishing
- Local Highway Issues
- Wider Strategic Highway Issues
- Minerals and Waste
- Flood and Drainage Issues
- Public Health
- Local Member Views

## 2. Norfolk Count Council Local Impact Report (REP1-061)

### **Summary Response**

2.1 The Applicant has responded to the matters raised by Norfolk County Council, referring primarily to the Applicant's Comments on Relevant Representations submitted at Deadline 1 (Annex 1, REP1-131). The Applicant would furthermore refer to the Statement of Common Ground between Norfolk County Council and Hornsea Project Three (REP1-232) which provides a summary of those matters which have been agreed, and those which remain under discussion. The Applicant will continue to engage with Norfolk County Council in respect to those points under discussion and remains confident that further progress in reaching agreement will be made.

## Full Response

Norfolk County Council Local Impact Report	Applicant's Response
<p><b>Introduction</b></p> <p>1.1. This report sets out Norfolk County Council's position with regard to the submitted Development Consent Order (DCO) application made under section 56 of the Planning Act (2008).</p> <p>1.2. The County Council is a statutory consultee as the proposed development is a Nationally Significant Infrastructure Project (NSIP) under the above Act and is located both:</p> <p>(a) Adjacent to the County – offshore Wind Farm located in the North Sea (see Appendix 2 Map 1); and</p> <p>(b) Within the County with regard to the supporting onshore grid connection infrastructure (see Appendix 3 Map 2).</p> <p>1.3. The principal role of the County Council in responding to the above wind farm and ancillary onshore infrastructure application, is in respect of the Authority's statutory role as:</p> <ul style="list-style-type: none"> <li>·Highways Authority;</li> <li>·Minerals and Waste Planning Authority;</li> <li>·Lead Local Flood Authority; and</li> <li>·Public Health responsibilities.</li> </ul> <p>1.4. In addition, the County Council has an advisory environmental role and economic development function, which has also fed into the response to the DCO application.</p> <p>1.5. The issues and impacts described/raised below simply relate the County Council's statutory and advisory functions.</p>	<p>The scope of Norfolk County Council's remit is noted.</p>
<p><b>2. Background</b></p> <p>2.1. The County Council recognise this as a DCO application for an offshore windfarm and onshore ancillary grid connection infrastructure in Norfolk, which will be determined by the Secretary of State for Business, Energy and Industrial Strategy. The application is defined as a Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008.</p> <p>2.2. The County Council responded to the pre-application Preliminary Environmental Information Report (PEIR)(Section 42 Consultation) version of this proposal in September 2017. At that time the County Council's Environment Development and Transport Committee broadly supported the proposal subject to a number of detailed matters being resolved (see Appendices 6 (a) and (b)). The County Council was subsequently consulted on various amendments to the Section 42 (focussed consultation) by the applicant and the County Council's comments are set out in Appendices 6 (c) and 6 (d).</p> <p>2.3. In the intervening period between the pre-application (Section 42 Consultation) and submission of the Development Consent Order (DCO) application (under Section 56 of the Planning Act 2008), the County Council has been working closely with Orsted (the applicant) on the issues previously raised and many of these matters have now been addressed (or are in the process of being addressed) for example – the applicant has agreed / provided:</p>	<p>Noted, the Applicant has responded to each of the points raised within the LIR in turn below. The Applicant would refer to the Statement of Common Ground between Norfolk County Council and Hornsea Project Three (REP1-232) which provides a summary of those matters which have been agreed, and those which remain under discussion. In respect to the example provided by Norfolk County Council, the Applicant would clarify:</p> <p>c) Any decision to establish a community benefit fund for Hornsea Three, and the mechanism and triggers for contributions to it, would be made post financial investment decision (FID). The potential for a CBF is outwith the planning regime, and no weight should be attached to that by the Secretary of State in determining the Application. However, the Applicant has established voluntary community benefit funds for a number of previous projects which are currently under construction;</p> <p>e) The mitigation proposed in respect to commercial fisheries is set out in Volume 2, Chapter 5: Commercial Fisheries of the Environmental Statement (APP-066) and the Outline Fisheries Coexistence and Liaison Plan (APP-183), which includes the appointment of a Fisheries Liaison Officer to ensure ongoing communication between the Applicant and the Norfolk fishing community.</p>
<p>(c) A commitment to establishing a Community Benefit fund;</p>	<p>g) The Applicant would refer to Annex 15.1 of the Consultation Report (APP-049, page 62) where the Applicant</p>

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<p>(d) Reducing the construction duration of the project overall from 11years to 8 years maximum thereby reducing the potential impacts on communities and businesses in Norfolk;</p> <p>(e) Agreement to compensate the local fishing community;</p> <p>(f) Recognising the potential impacts on local and strategic highway network and working closely with Highways England and the County Council as Highway Authority on proposed new road schemes i.e. to avoid any conflict between the cabling route and any proposed new road schemes;</p> <p>(g) Recognising in part the opportunity for power to feed electricity into the local distribution network. It should be noted that the County Council has endorsed a Tri-LEP Local Energy Strategy which seeks to address the issues surrounding secondary inter-connection i.e. Lobbying for legislative change to allow for electricity to be potentially taken off the cable route to supply local needs.</p> <p>2.4. There are still a number of on-going issues and concerns regarding the proposal and these are set out in the "Assessment Section" (Section 4) below in respect to the DCO application (under Section 56 of the 2008 Planning Act). NB These issues and concerns were agreed by the County Council's in July 2018 (see below).</p>	<p>notes that the transfer from the National Grid to the local network, or the capacity of the local transmission network is beyond the Applicant's control. However, Ørsted understands UK power networks has demand feeder connections at Norwich Main which already supply the local area with power.</p> <p>The Applicant will continue to engage with Norfolk County Council in respect to those points under discussion.</p>												
<p><b>3. The Proposal – DCO Application</b></p> <p>3.1. The County Council has assessed the proposal on the following basis:</p> <p><b>(a) Offshore:</b></p> <table border="1" data-bbox="151 1227 845 2031"> <tbody> <tr> <td data-bbox="151 1227 343 1350">Location and Distance Offshore</td> <td data-bbox="343 1227 845 1350">Located between 121 km off the Norfolk Coast and 160 km off the Yorkshire Coast (see Map 1 Appendix 2).</td> </tr> <tr> <td data-bbox="151 1350 343 1406">Total Site Area</td> <td data-bbox="343 1350 845 1406">696 sq.km. (29 km by 35 km)</td> </tr> <tr> <td data-bbox="151 1406 343 1496">Proposed Capacity</td> <td data-bbox="343 1406 845 1496">Installed capacity of 2.4 Giga-Watt (sufficient to supply 2 million households with electricity).</td> </tr> <tr> <td data-bbox="151 1496 343 1619">Number and size of turbines</td> <td data-bbox="343 1496 845 1619">Up to 300 turbines with a tip height of up to 250 metres; or 160 turbines with maximum height of 325 metres;</td> </tr> <tr> <td data-bbox="151 1619 343 2031" rowspan="3">Offshore works</td> <td data-bbox="343 1619 845 1765">Offshore export cable corridor (length of up to 163 km, width of up to 1.5 km) – 6 subsea export cables with length of individual export cable (including within array area) of 191 km.</td> </tr> <tr> <td data-bbox="343 1765 845 1888">ancillary structure length and width of 100 m and topside height excluding helideck or lightning protection 70 m;</td> </tr> <tr> <td data-bbox="343 1888 845 2031">4 x Offshore HVDC (High Voltage Direct Current) Converter substation 180m x 90m x height 100 m (excluding helideck or lightning protection); or</td> </tr> </tbody> </table>	Location and Distance Offshore	Located between 121 km off the Norfolk Coast and 160 km off the Yorkshire Coast (see Map 1 Appendix 2).	Total Site Area	696 sq.km. (29 km by 35 km)	Proposed Capacity	Installed capacity of 2.4 Giga-Watt (sufficient to supply 2 million households with electricity).	Number and size of turbines	Up to 300 turbines with a tip height of up to 250 metres; or 160 turbines with maximum height of 325 metres;	Offshore works	Offshore export cable corridor (length of up to 163 km, width of up to 1.5 km) – 6 subsea export cables with length of individual export cable (including within array area) of 191 km.	ancillary structure length and width of 100 m and topside height excluding helideck or lightning protection 70 m;	4 x Offshore HVDC (High Voltage Direct Current) Converter substation 180m x 90m x height 100 m (excluding helideck or lightning protection); or	<p>Noted.</p>
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	<p>4 x Offshore HVAC (High Voltage Alternating Current) booster stations – topside main structure length and width of 90 m, topside ancillary structure length and width of 100 m and topside height 70 m (excluding helideck or lightning protection). This infrastructure could also be sub-sea (on the sea bed) – 6 x Offshore subsea HVAC booster stations – 50 m x 50 m x height 15m above seabed;</p> <p>Up to 3 accommodation platforms for construction and maintenance staff (150 operation staff) located within Array Area – 60 m x 60 x height 64 m.</p>	
<b>(b) Onshore Work:</b>		
Landfall Location	Weybourne – all associated permanent infrastructure will be located underground (see Map 2 Appendix 3);	
HVAC Booster	<p>Required if electricity brought ashore using HVAC technology within approx. 10 km of landfall.</p> <p>Proposed site located at Little Barningham (between Edgefield and Saxthorpe (see Map 3 Appendix 4)</p> <p>HVAC Booster station likely to comprise:</p> <p>Single (length 120 m x width 75 m); or multiple building(s) up to 6 buildings (60 m x 40 m, per building). There may also be smaller adjacent buildings (control rooms etc.).</p> <p>Maximum height of all buildings 12.5 m (excl. lightning protection at 17.5 m).</p> <p>Site maximum footprint 30,407 sq.m. Plus temporary area for construction works (25,000 sq.m.)</p> <p>(NB the decision on whether to use HVAC or HVDC will be made after the project is consented.)</p> <p>Construction duration: 24 months;</p>	
Cable route	Buried cable route between Weybourne and grid connection at Norwich Main National Grid Substation (53 km) – (See Map 2 Appendix 3).	
Grid Connection	Switch transfer electricity from the wind farm into the grid (400 kv). The proposed substation will be located adjacent to the Norwich Main National Grid Substation – (see Map 4	

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	Appendix 5).	
Grid Connection – infrastructure:	<p>A new onshore substation will be required with a footprint of up to 149,302 sq.m plus temporary construction area (91,000 sq.m.); Maximum building height of 25 metres (excl. lightning protection at 30 m).</p> <p>HVAC scenario – up to 3 main buildings - length 150 m x width 75 per building. Or single building 250 m x 75 m per building (maximum height 15 m).</p> <p>HVDC scenario - 2 buildings - 220 m x 75 (maximum height 25 m).</p> <p>Duration of construction 36 months</p>	
Landscaping	Strategic landscaping to mitigate adverse effects of the operation of the HVAC booster station, HVDC converter/HVAC substation (see Maps 3 and 4 Appendix 4 and 5);	
Ancillary Works will include	<p>Temporary main, secondary and HDD construction</p> <p>compounds and storage areas – i.e. including welfare facilities and hard standing. Main compound (see Map 2 Appendix 3) - up to 40,000 sq.m.</p> <p>Construction of temporary haul roads, access tracks, ramps and means of access and footpaths;</p> <p>Bunds, embankments, swales, landscaping, fencing and boundary treatments;</p> <p>Habitat creation;</p> <p>Works for the provision of apparatus including cabling, water and electricity supply works, foul drainage provision, surface water management systems and culverting;</p> <p>Landscaping and other works to mitigate any adverse effects of the construction,</p> <p>Archaeological and ground investigation works;</p> <p>Improvements to highway verges;</p> <p>Highway and private access roads;</p> <p>Works to move main sewers, drains; and cables;</p> <p>Works affecting non-navigable rivers, streams or water courses; and</p> <p>Works for the benefit or protection of land affected by the authorised project.</p>	



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Construction Phasing		
<p>The EIA indicates that there are a range of transmission options involving using either: (a) High Voltage Alternating Current (HVAC); or (b) High Voltage Direct Current (HVDC). Traditionally HVAC systems have been used in the UK for transmission as the technology is readily available and cheaper. However, HVDC technology is developing and becoming more economically viable. A HVDC solution would remove the need for both offshore and onshore Booster Stations. Hornsea Project Three may use HVAC or HVDC. The EIA shows the maximum infrastructure requirements needed (i.e. a worse case) for each topic of the EIA which may be based on either HVDC or HVAC technology depending on the receptor.</p>		
<p>4. Hornsea Project Three Windfarm DCO Application Local Impacts on Norfolk</p> <p>4.1. This section of the report assesses the EIA Environmental Statement in respect of the County Council's key functions and sets out the Authority's proposed response / comments. The response largely relates to the onshore infrastructure required to connect the electricity generated to the National Grid. The attached Appendix 1 provides more detailed County Council comments; holding objections; and proposed planning conditions/requirements.</p> <p>4.2. The Assessment and the comments below have been agreed by Norfolk County Council's Environment, Development and Transport (EDT) Committee on 6 July 2018 and represent the County Council's formal views.</p> <p>It should be noted that discussions are on-going between the applicant (Orsted) and the County Council in an attempt to overcome and resolve as many of the issues cited below. Where agreement has been reached this will be shown in the Statement of Common Ground (SoCG).</p> <p>Overview - National Context</p> <p>4.3. As the above proposal is a NSIP it will be the Secretary of State (SoS) rather than the respective LPAs who will determine the application. The SoS will need to have regard to Local Plan policies and allocations when determining the application. The individual LPAs, including the County Council, are also statutory consultees in the NSIP process and will respond having regard to their Local Plan policies and other statutory responsibilities including environmental health (District Councils).</p> <p>4.4. The proposal has a maximum capacity of 2.4 Giga Watts (2,400 MW) of electricity, sufficient to power approximately 2 million households (i.e. this represents almost five times as many dwellings in Norfolk (2011)). Current operational offshore capacity in the UK is just over 4 GW (2015), therefore if consented the Hornsea proposal would potentially increase the UK's installed capacity by 60%.</p> <p>4.5. The proposal will generate forty times more energy than the Scroby Sands wind farm (60 MW) and more than seven times more</p>		<p>Noted. The Applicant would agree with NCC that discussions are ongoing between the parties. The Applicant would refer to the Statement of Common Ground between Norfolk County Council and Hornsea Project Three (REP1-232) which provides a summary of those matters which have been agreed, and those which remain under discussion.</p>

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<p>energy than the Sheringham Shoal wind farm (317 MW). As such the proposal would contribute to the Government's Renewable Energy targets and objectives (see Section 5 below).</p> <p>4.6. At a national-level the key energy objectives are:</p> <ul style="list-style-type: none"> <li>· Reducing greenhouse gases (carbon reduction);</li> <li>· Providing energy security; and</li> <li>· Maximising economic opportunities.</li> </ul> <p>In order to meet these objectives more infrastructure is required with an increased emphasis on energy generation from renewable and low carbon sources.</p> <p>4.7. The government's long-term aspiration is to increase the diversity of the electricity mix, thereby improving the reliability of energy supplies as well as lowering carbon emissions. The Government is committed to the following targets by 2030:</p> <ul style="list-style-type: none"> <li>· A 40% cut in greenhouse gas emissions compared to 1990 levels;</li> <li>· At least a 27% share of renewable energy consumption; and</li> <li>· At least 27% improvement in energy efficiency.</li> </ul> <p>4.8. The Energy Act 2013 includes provision intended to incentivise investment in low carbon electricity generation, ensure security of supply and help the UK meet its emissions reduction and renewable energy targets. The Climate Change Act 2008 underlines the government's commitment to addressing both the causes and consequences of climate change. The Act aims to improve carbon management and help the transition towards a low carbon economy in the UK. The Planning Act 2008 also makes specific reference to the need for local authorities to tackle climate change.</p> <p>4.9. In terms of planning the UK's commitment to renewable energy has been captured in the following National Policy Statements (NPSs):</p> <ul style="list-style-type: none"> <li>· Overarching NPS for Energy (NPS EN 1);</li> <li>· NPS for Renewable Energy Infrastructure (NPS EN 3);</li> <li>· NPS for Electricity Networks Infrastructure (NPS EN 5).</li> </ul> <p>The Planning Act 2008 requires the Secretary of State to have regard to the relevant NPSs when making their decision.</p> <p>4.10. With regard to local planning issues the National Planning Policy Framework (NPPF 2018) indicates that the planning system has a key role in supporting the delivery of renewable and low carbon energy and associated infrastructure. To help increase the use and supply of renewable energy the NPPF (section 14) indicates, inter alia, that local planning authorities (LPAs) should:</p> <ul style="list-style-type: none"> <li>· provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);</li> <li>· consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and</li> </ul>	

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<ul style="list-style-type: none"> <li>· identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.</li> </ul>	
<p><b>Norfolk County Council – Strategic Overview</b></p> <p>4.11. The principle of this offshore renewable energy proposal has been supported by the County Council as it is consistent with national renewable energy targets and objectives. However, this support is subject to the detailed comments, holding objections; and proposed planning conditions below being satisfactorily resolved.</p>	<p>The Applicant notes NCC's support of the principle of offshore renewable energy subject to the detailed comments responded to below.</p>
<p><b>Electricity Supply Issues –</b></p> <p><b>(a) Transmission Alternatives</b></p> <p>4.12. The applicant is continuing to pursue both options in respect of HVAC and HVDC. The ES acknowledges that both transmission types have a range of relative benefits and drawbacks. The main advantage of using HVDC would be that this removes the need for a Booster Station at Little Barningham. Orsted have indicated that they require flexibility in transmission system choice “to ensure anticipated changes in available technology and project economics can be accommodated within the scheme design and will make a decision during the detailed design phase post consent.”</p> <p>Comment / Issue – the County Council's preferred option would be for Orsted to pursue a HVDC solution which would overcome the need for a HVAC Booster Station, but recognises that the HVDC convertor station at Swardeston would have a greater height than the HVAC option.</p>	<p>The Applicant would refer to the response provided in Applicant's Comments on Relevant Representations submitted at Deadline 1 (Annex 1, REP1-131), as well as Appendix 22 of the Applicant's response to Deadline 1 (REP1-164).</p>
<p><b>(b) Grid Connection</b></p> <p>4.13. Orsted have indicated to officers that the transfer of electricity from the National Grid to the local network, or the current capacity of the local transmission network is beyond the projects control. Orsted understands that UK Power Networks (UKPN) has demand feeder connections at Norwich Main, which already supply the local area with power. Therefore, any power produced by Hornsea Three and injected into Norwich Main 400kV substation, will feed into both local demand (through these feeders) and the National transmission system, as this is the nature of electrical interconnection.</p> <p><b>Comment / Issue</b>– welcome the flexibility within this application to allow for electricity generated to feed into the local network (from Norwich Main) but consider that Orsted should pursue with National Grid and UKPN the opportunities for a secondary interconnection along the cable route in order to supply electricity where it may potentially be required to support housing and employment growth.</p>	<p>The Applicant would refer to the response provided in Applicant's Comments on Relevant Representations submitted at Deadline 1 (Annex 1, REP1-131).</p>
<p><b>Socio-Economic Issues</b></p> <p>4.14. As previously reported there are potentially significant economic benefits that may arise from the Hornsea proposal in terms of:</p> <ul style="list-style-type: none"> <li>· Local employment creation;</li> <li>· Business sectors affected by construction; and</li> </ul>	<p>The Applicant would refer to the response provided in Applicant's Comments on Relevant Representations submitted at Deadline 1 (Annex 1, REP1-131).</p>

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<p>Operations and Maintenance (O&amp;M) of the wind turbines.</p> <p>4.15. The ES indicates that during the construction phase up to 880 jobs (Full Time Equivalent – FTE) could be supported and that a further 1,290 jobs (FTE) could be supported during the Operations and Maintenance phase. However, Orsted has indicated that the selection of a port for construction and operation will only be made post consent. In the meantime, they will... “explore the ability to use port facilities along the East Coast but are likely to use more than one port during construction, and cannot as yet ascertain where they would site an operations and maintenance base. A decision on which port to use will not be made until detailed discussions have taken place with potential suppliers, at a stage where they have a greater understanding of where the various components will come from and port capabilities.”</p>	
<p>4.16. The County Council is working with all energy companies and the New Anglia LEP to promote this sector and develop a Skills Strategy for the types of skills required for young people in schools and colleges. In addition, the County Council would like to see:</p> <ul style="list-style-type: none"> <li>· Apprenticeships,</li> <li>· Work experience; and</li> <li>· Internship opportunities at an appropriate stage.</li> </ul> <p>4.17. The County Council is working with Orsted to further develop the above Strategy and ensure that there is a skills legacy to the project.</p> <p><b>Comment</b></p> <p>4.18. It is felt that the County Council should continue to work proactively with Orsted to demonstrate the economic benefits of using the Port facilities at Great Yarmouth for:</p> <ul style="list-style-type: none"> <li>· Construction; assembly and manufacture of windfarm components; and</li> <li>· Operations and maintenance.</li> </ul> <p>The County Council will continue to work with the applicant to develop the creation of apprenticeship; work experience and internships.</p>	<p>The Applicant would refer to the response provided in Applicant's Comments on Relevant Representations submitted at Deadline 1 (Annex 1, REP1-131). The Applicant is committed to providing a Skills and Employment Plan under Requirement 22 of the dDCO (REP1-127).</p>
<p><b>Wider Community Issues and Impact on business</b></p> <p>4.19. Orsted have indicated that they have established voluntary Community Benefit Funds (CBFs) for a number of their projects, which are currently under construction. These funds can make a valuable contribution to the local area, by supporting projects such as community building improvements and recreation facilities, conservation and wildlife projects etc. It is understood that Hornsea Project Three will review the interactions of the project, as the proposal is refined and consider an appropriate way to feed benefits back into the local community. However, any decision to establish a CBF for Hornsea Project Three would be made post financial investment decision (FID), when the Project has been given the green light to go ahead.</p> <p>4.20. <b>Comment / Support</b> – welcome the commitment towards establishing a Community Benefit Fund and would ask Orsted to ensure all stakeholders/communities are made aware of such funds and have the opportunity to make appropriate bids.</p> <p>4.21. Compensation to businesses –the applicant has indicated</p>	<p>The Applicant would refer to the response provided in Applicant's Comments on Relevant Representations submitted at Deadline 1 (RR-031 and Annex 1, REP1-131). The potential for a CBF or compensation not part of the Compulsory Acquisition Compensation Code is outwith the planning regime, and no weight should be attached to that by the Secretary of State in determining the Application.</p>

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<p>that the Project has committed to reducing the number of construction phases from three to two, which has subsequently resulted in a reduced maximum construction duration onshore from 11 years to 8 years. In respect to compensation, Orsted will compensate landowners who are directly affected by the cable route through their land. Compensation is paid for the freehold depreciation of the land affected by the easement and for all reasonable and substantiated losses arising from construction of the project.</p> <p>4.22. <b>Comment</b> – while welcoming the reduction in construction duration, it is felt that Orsted should commit to providing appropriate compensation for businesses and communities adversely affected by the construction works.</p>	
<p><b>Commercial Fishing</b></p> <p>4.23. The ES recognises that there will a number of potential impacts on commercial fisheries associated with the construction, operation, maintenance and decommissioning of the Hornsea Three project. These include, for example, potential reductions in access to fishing grounds; increased fishing pressure elsewhere; additional steaming times; and potential for gear snagging. These impacts are described as “moderate adverse” in the ES in respect of construction and decommissioning for UK potting vessels.</p> <p>4.24. To overcome these impacts Orsted propose the following mitigation:</p> <ul style="list-style-type: none"> <li>· Advance warning and accurate location details of construction operations;</li> <li>· Associated safety zones and advisory distances;</li> <li>· On-going liaison with all fishing fleets; and</li> <li>· Disturbance payments.</li> </ul> <p><b>Comment / Support</b></p> <p>4.25. Welcome the proposed mitigation and compensation measures set out in the ES and would ask that Orsted continue to work closely with the fishing community in order to minimise any potential impacts particularly during construction and decommissioning.</p>	<p>The Applicant notes NCC's support for the mitigation as set out in the Environmental Statement.</p>
<p><b>Local Highway Issues</b></p> <p>4.26. Detailed discussions and negotiations will remain on-going throughout the application process particularly in respect of any temporary road closures; construction traffic management plans; and other travel related planning. Notwithstanding these ongoing discussions officers have assessed the traffic implications arising from all the following: - the landfall area; onshore cable corridor; booster station; connection to the National Grid; compounds; storage areas; and construction accesses – as used by (and or affected by) construction; operational and decommissioning traffic.</p> <p>4.27. The application includes a Transport Assessment (TA) submitted in accordance with DfT guidance. Proposed HGV routes have been identified and acceptable restrictions have been offered to avoid adverse impact on sensitive receptors for example schools. Where practical the routes seek to utilise trunk; principal; and main distributor roads. Lower classification routes are only intended to be used where no other realistic alternatives are available.</p> <p>4.28. Up to two temporary haul roads will be constructed to enable</p>	<p>The Applicant would refer to the response provided in Applicant's Comments on Relevant Representations submitted at Deadline 1 (Annex 1, REP1-131).</p> <p>The Applicant would note that further progress has been made since Deadline 1, with the following documents of relevance to NCC's comments submitted at Deadline 2:</p> <ul style="list-style-type: none"> <li>• Appendix 1 to the Applicant's Response to Deadline 2 – Outline Travel Plan;</li> <li>• Appendix 2 to the Applicant's Response to Deadline 2 – Update to Annex A of Appendix 20 to Deadline 1 (REP1-176);</li> <li>• Appendix 3 to the Applicant's Response to Deadline 2 – Update to Appendix 29 to Deadline 1 (REP1-171): Permanent Access Note for HVDC Converter/HVAC substation;</li> <li>• Appendix 4 to the Applicant's Response to Deadline 2 – Update to Appendix 30 to Deadline 1</li> </ul>

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<p>vehicles to move along the cable corridor, thereby relieving the need for construction traffic to make longer journeys on the highway network. Where the cable corridor crosses main distributor roads, horizontal directional drilling will be used to avoid unacceptable disruption to traffic on the highway network.</p> <p>4.29. While the TA addresses a number of highway matters there remains a number of serious issue/concerns, which are yet to be resolved with the Highway Authority relating to HGV access arrangements at:</p> <p>(h) The HVAC Booster Station (Little Barningham - holding highway objection proposed on highway safety grounds until such time as clarification is received with regard to acceptable visibility splays; and</p> <p>(i) The proposed main compound at the former Oulton Airfield (see Appendix 1) - holding highway objection proposed on highway safety grounds.</p> <p>4.30. In addition, further highway comments relating to: damage to the highway; abnormal loads; cumulative impact; and travel plans are set out in the Appendix.</p>	<p>(REP1-156): Permanent Access Note for onshore HVAC booster station; and</p> <ul style="list-style-type: none"> <li>Appendix 5 to the Applicant's Response to Deadline 2 – Topography and Loading Assessment along B1149 and B1145.</li> </ul> <p>Appendix 4 to the Applicant's Response to Deadline 2 addresses point 4.29 (h); whilst Appendix 2 provides detail which will inform future discussions in respect to point 4.29 (i).</p>
<p><b>Local Highway Comments and holding objections</b></p> <p>4.31. As a consequence of these outstanding highway access issues the County Council will need to raise a holding highway objection; and require a condition (known as a "requirement") be imposed on the DCO requiring an up to date Construction Traffic Management Plan (see Appendix 1).</p> <p><b>Wider Strategic Highway Issues</b></p> <p>4.32. The proposed cable route passes to the west of Norwich and as such the County Council had previously raised issues concerning the proposed dualling of the A47 (T) between Easton and North Tuddenham; and the County Council's prioritised creation of the Norwich Western Link. It is understood that the applicant has been working closely with Highways England to ensure that their proposal (cable route) does not fetter any future plans for the proposed dualling of the A47 (T). In addition, the applicant has also been working closely with the County Council on the potential Western Link Road.</p> <p>4.33. Comment / Issue – It is felt that Orsted should continue to work closely with both Highways England and Norfolk County Council as Highway Authority to ensure that the proposed cable route does not fetter any future plans for the strategic highway network to the west of Norwich.</p>	<p>The Applicant would refer to the response provided in Applicant's Comments on Relevant Representations submitted at Deadline 1 (Annex 1, REP1-131).</p> <p>The Applicant would furthermore refer to the Statement of Common Ground between Highways England and Hornsea Project Three submitted at Deadline 1 (REP1-226).</p>
<p><b>Minerals and Waste</b></p> <p>4.34. Orsted have worked closely with the County Council as Minerals and Waste Planning Authority. The County Council considers that the Environmental Statement adequately addresses minerals and waste issues and as such does not have any objection as Minerals and Waste Planning Authority</p> <p><b>Comment</b></p> <p>4.35. While the County Council does not have any minerals and waste planning concerns at this stage it is felt that the applicant should continue to work closely with the County Council as the application is</p>	<p>The Applicant would refer to the response provided in Applicant's Comments on Relevant Representations submitted at Deadline 1 (Annex 1, REP1-131).</p>

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<p>progressed through to Examination.</p>	
<p><b>Flood and Drainage Issues –Lead Local Flood Authority (LLFA)</b></p> <p>4.36. The ES has assessed the risk from all sources of flooding and sets out proposed surface water strategies for the HVAC booster station at Little Barningham, the HVDC converter / HAVC substation near Swardeston and the onshore cable corridor study areas. If the infrastructure is considered to be crucial national infrastructure or strategic infrastructure then the LLFA would suggest that the development ensures that it is not at risk of the 0.1% annual probability flood event. This would include the proposed SuDS and associated drainage network. The majority of the project lies within areas of low risk of surface water flooding of 1 in 1000 (0.1% annual probability) flood event as shown in the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps, except in the locations where the cable corridor crosses main rivers and ordinary watercourses.</p> <p>4.37. <b>Comment</b> – the LLFA welcome that Sustainable Drainage Systems (SuDS) have been proposed for the project where permanent above ground infrastructure is proposed to mitigate against additional impermeable surfaces creating an additional risk of flooding. Having considered the submitted documents, the LLFA are pleased to see that strategies have been supplied for the HVAC booster station and the HVDC converter / HAVC substation study areas. The cable corridor has not been considered in the drainage strategy due to the fact that the cable would be below ground and reinstatement to pre development state would mitigate the potential for increased runoff.</p> <p>4.38. <b>Construction compounds</b> - It is noted that stockpiled material and construction compounds are proposed to be located outside of the floodplain (where possible), and as such have not been included in the study areas.</p> <p><b>Comment</b> - it is suggested that additional information regarding these areas is provided in the flood risk assessment and drainage strategy.</p>	<p>The Applicant would refer to the response provided in Applicant's Comments on Relevant Representations submitted at Deadline 1 (Annex 1, REP1-131).</p>
<p>4.39. <b>Watercourses</b> - The Environmental Statement states that the crossing of ordinary watercourses would be by Horizontal Directional Drilling, open cut, temporary bridges or culverts. It is noted that all Norfolk County Council ordinary watercourses are proposed to be crossed by Horizontal Directional Drilling for permanent works and hence no consent from Norfolk County Council as Lead Local Flood Authority is required. If this changes, or any other temporary works proposed as part of this project are likely to affect flows in an ordinary watercourse, then the applicant would need the approval of Norfolk County Council. The County Council would appreciate early consultation on the number of such crossings of Ordinary Watercourses and the required timeframes for approval. This will enable the team to have adequate staffing resources in place to ensure approvals are not unduly delayed and for and issues to be identified. We also highlight that other ordinary watercourse crossings would need consent approval from the relevant Internal Drainage Board (IDB). In line with good practice, Norfolk County Council seeks to avoid culverting, and its consent for such works will not normally be granted except as a means of access. It should be noted that this approval is separate from planning and temporary mitigation methods may be required whilst cable laying is undertaken.</p> <p>4.40. <b>Comment</b> - Norfolk County Council appreciates that these</p>	<p>The Applicant would refer to the response provided in Applicant's Comments on Relevant Representations submitted at Deadline 1 (Annex 1, REP1-131).</p>

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<p>are initial drainage proposals, however ideally the matters above (infiltration testing and drainage design) should be clarified prior to determination, to ensure that the site has a deliverable surface water drainage strategy. In particular there is no maintenance or management strategy supplied with the application and the LLFA have to assume that the applicant will take responsibility for maintaining the drainage for the lifetime of development.</p> <p>4.41. <b>Comments continued</b> – The LLFA will require a series of issues to be resolved ahead of commencement, including, for example: detailed infiltration testing; detailed design modelling calculations; design of drainage structures; a maintenance and management plan etc. These issues can be addressed through a pre-commencement condition (see Appendix 1) attached to a DCO.</p> <p>4.42. On-going discussions will continue throughout the DCO process between LLFA officers and the applicant.</p>	
<p><b>Public Health</b></p> <p>4.43. The County Council would expect detailed matters relating to construction noise and local environmental health to be addressed by the relevant District Councils. Providing the District Councils are satisfied with the proposal in relation to the above matters, the County Council would not wish to raise any public health concerns at this time.</p>	<p>The Applicant would refer to the response provided in Applicant's Comments on Relevant Representations submitted at Deadline 1 (Annex 1, REP1-131).</p>
<p><b>Local Member Views</b></p> <p>4.44. The Local County Council Member for Melton Constable has made the following comments:</p> <ul style="list-style-type: none"> <li>• Welcomes the fact that an experienced and respected developer has invested significant time and money preparing this proposal, which will help the UK reduce its reliance on carbon energy;</li> <li>• Considers it is vital that local people's concerns are listened to, in terms of the effects of the proposed development on their lives, and the steps that could be taken to mitigate them;</li> <li>• Mitigating the impact on work, life and the environment must be paramount, and no expense spared;</li> <li>• It is essential that any application for which consent is granted must contribute strategically to the local area as well;</li> </ul> <p>Would like to see the developer propose ways in which the proposed development will benefit the local community in terms of infrastructure in the long term - be that through improved transport, digital infrastructure or otherwise.</p>	<p>The Applicant would refer to the response provided in Applicant's Comments on Relevant Representations submitted at Deadline 1 (Annex 1, REP1-131).</p>
<p><b>5. Updates following Committee</b></p> <p>5.1. The County Council's Environment Development and Transport Committee agreed all the above comments and added the following:</p> <p>(1) Added a further recommendation (4) (Front page) as follows: Considers that the applicant should ensure that the proposal brings real socio-economic benefits to both (a) the individual communities directly affected by the planned infrastructure works and (b) the County as a whole.</p> <p>(2) Added a further comment under the heading "Wider Community Issues and Impact on Business" as follows:</p>	<p>In respect to 5.1 (1), the Applicant would refer to the response provided in Applicant's Comments on Relevant Representations submitted at Deadline 1 (RR-031 and Annex 1, REP1-131).</p> <p>In respect to 5.1 (2), the Applicant has carefully developed the parameters established in the Environmental Statement accompanying the DCO application to ensure that the project can be delivered in the timescales set out. The Applicant considers there are sufficient control mechanisms in place. The project must be delivered within the terms of the documents secured or approved pursuant to the Requirements of the DCO</p>



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<p>The Committee also agreed that there should be penalties imposed on the developer of Hornsea Three in the event that the project over-runs beyond the timetable set out in the Environmental Statement accompanying the DCO application. Such penalties should include financial compensation to be paid into a Community Benefit Fund.</p>	<p>The relevant timeframes are set out within 6.1.3 ES Volume 1 - Ch 3 - Project Description [APP-058], respective ES chapters and other application documentation. Requirement 6 of the dDCO requires the submission of a phasing scheme to the relevant planning authority for approval, and implementation as approved. When determining whether or not to approve the phasing plan, the relevant planning authority must have regard to the information set out in the ES.</p> <p>Further controls exist in the Outline Code of Construction Practice, and landowners affected by the project may be entitled to compensation via agreements entered with them or the Compulsory Acquisition Compensation Code.</p> <p>Failure to comply with the DCO and/or documents approved pursuant to its Requirements, such as the phasing plan and CoCP, is a criminal offence and the relevant planning authority could bring a prosecution. Therefore, the Applicant does not consider that a prescribed penalty provision as suggested by NCC Cllrs is warranted nor would it fulfil the tests for Requirements (i.e that they are necessary or reasonable) when enforcement provisions under the Planning Act 2008 already exist and the relevant planning authorities are the enforcing bodies under that Act.</p> <p>The Applicant would highlight responses to Q.1.10.3 and Q1.10.5 made at D1 which frame the scope of the any Community Benefit Fund (if established).</p>
<p><b>6 – Conclusion</b></p> <p>6.1. Norfolk County Council fully supports the principal of offshore wind energy, which is consistent with national policies on energy particular in respect of:</p> <ul style="list-style-type: none"> <li>· Reducing greenhouses;</li> <li>· Providing energy security; and</li> <li>· Maximising economic opportunities.</li> </ul> <p>6.2. The above report and supporting appendices, however, show that while the County Council supports the principal of this proposal, there are a number of issues directly affecting the Authority which need to be resolved as part of the DCO process. In particular there are:</p> <p><b>Highway issues</b> – specifically in respect of access to the proposed sites for a booster station and grid connection facility. There are also access issues in relation to the main works compound</p> <p><b>Flood Risk and drainage issues</b> – the need for: infiltration testing, further design modelling; design drainage structures; and maintenance and management plan.</p> <p>These issues can be resolved through a planning condition/requirement attached to the DCO;</p> <p><b>Public Rights of Way issues</b> – issues need to be resolved around the proposed temporary re-routing of the North Norfolk Coast Path</p> <p><b>Archaeological issues</b> – issues need to be resolved involving further investigative works. These issues can be addressed through a planning</p>	<p>The Applicant has responded to each of the detailed points raised within the LIR in turn above. In respect to these matters, as well as other mentioned within this conclusion, the Applicant would refer to the Statement of Common Ground between Norfolk County Council and Hornsea Project Three (REP1-232) which provides a summary of those matters which have been agreed, and those which remain under discussion.</p> <p>The Applicant will continue to engage with Norfolk County Council in respect to those points under discussion and remains confident that further progress in reaching agreement will be made.</p>

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<p>condition/requirement attached to the DCO.</p> <p>6.3. In addition to these direct planning issues there are wider strategic matters which need to be addressed and explored through the DCO process in order to maximise the potential socio-economic benefits, including:</p> <p>(j) Wider consideration surrounding the possibility for secondary interconnection, which would allow for electricity generated from the offshore wind farm to be used within the local distribution networks along the cable route;</p> <p>(k) The potential to use HVDC to avoid the need for a Booster station in North Norfolk; and</p> <p>(l) Economic benefits – use of ports in Norfolk during construction and providing operation and maintenance support.</p> <p>6.4. The County Council continues to work with Orsted in order to resolve the above issues.</p>	
<p>Appendix 1 – Detailed Highway; Environmental; and Flood Risk Comments</p> <p>Appendix 2 – Map 1 – Location of the proposed Hornsea Three Wind Farm</p> <p>Appendix 3 – Map 2 – Onshore Cable Route and location for the onshore HVAC Booster Station and HVDC Converter / HVAC Substation</p> <p>Appendix 4 – Map 3 – Onshore Booster Station Location</p> <p>Appendix 5 – Map 4 Location of Onshore HVDC Converter / HVAC Substation</p> <p>Appendix 6 (a) (b) (c) (d) – Norfolk County Council's Response to the Preliminary Environmental Information Report (PEIR) - 2017</p>	<p>In respect to Appendix 1, the Applicant would refer to the responses provided in Applicant's Comments on Relevant Representations submitted at Deadline 1 (Annex 1, REP1-131).</p> <p>Appendix 2 – 5 require no response and Appendix 6 are considered to have been superseded by the relevant representation (RR-035), local impact report (REP1-061) and the record of discussions between parties set out in the Statement of Common Ground between Norfolk County Council and the Applicant.</p>

