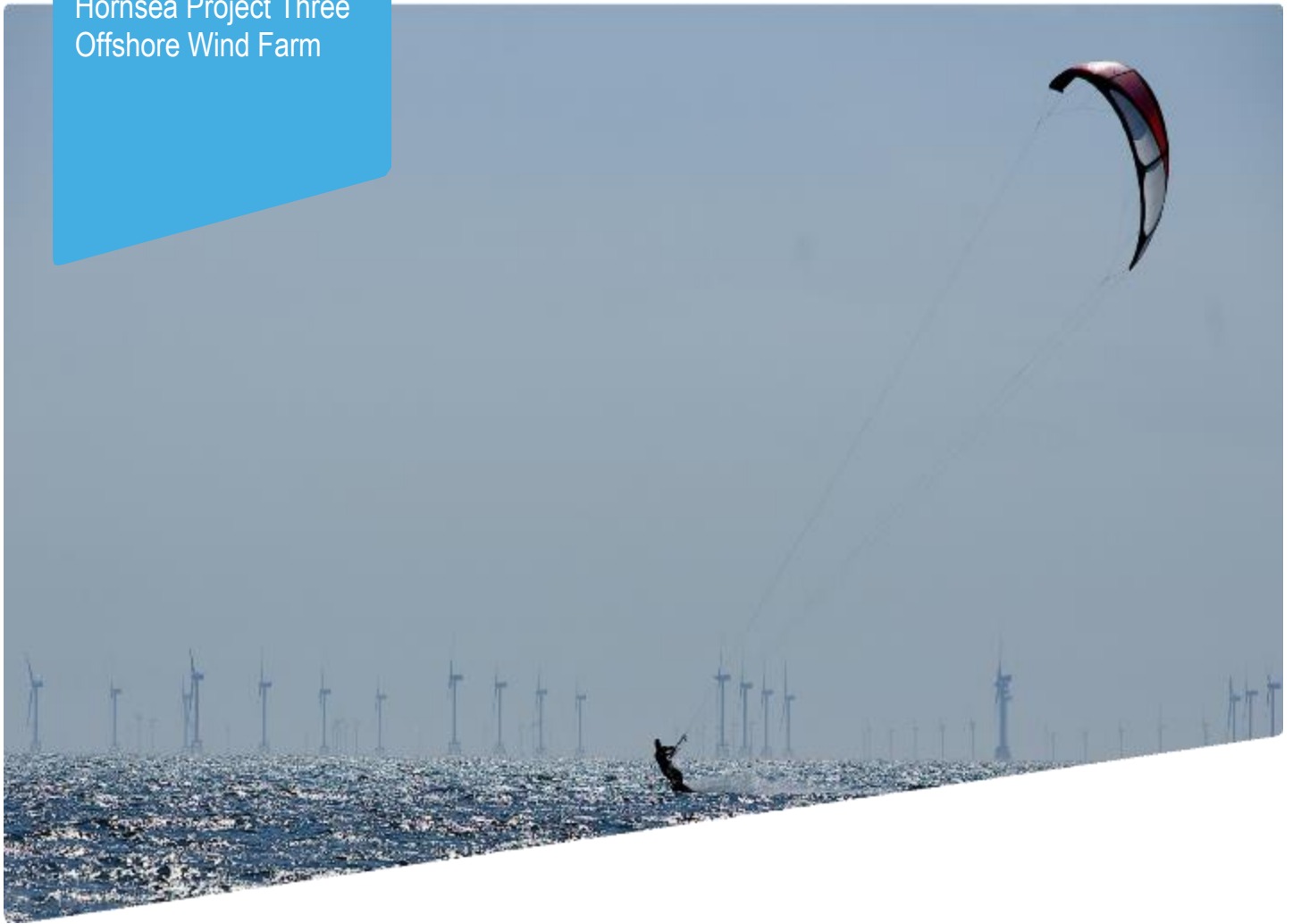


Hornsea Project Three
Offshore Wind Farm



Hornsea Project Three Offshore Wind Farm

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

Date: March 2019

**Hornsea 3**
Offshore Wind Farm

**Orsted**

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., 2019.

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
5	January 2019	Ørsted	First Draft for review by SNC ahead of submission at Deadline 4
6	January 2019	Ørsted	Updated draft with inputs from South Norfolk Council
7	January 2019	Ørsted	Final for signing
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9	March 2019	Ørsted	Draft for review by SNC ahead of submission at Deadline 7
8	March 2019	Ørsted	Final for submission at Deadline 7

Signatories

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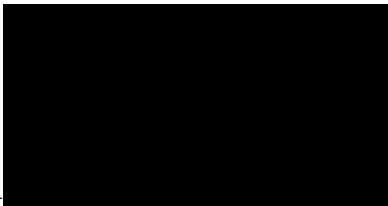
Signed	
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Table of Contents

1. Introduction.....	6
Overview.....	6
Approach to SoCG.....	6
Hornsea Three.....	6
2. Consultation	8
Application elements within South Norfolk Council's administrative area.....	8
Consultation summary	8
3. Agreements Log	10
General.....	10
Landscape and Visual Resources.....	13
Historic Environment.....	26
Noise and Vibration.....	32
Air Quality	38
4. Summary	42
Annex A.....	43
Annex B.....	46

List of Tables

Table 2.1: Pre-application consultation with South Norfolk Council.	9
Table 2.2: Post application consultation with South Norfolk Council.	9
Table 3.1: General	11
Table 3.2: Landscape and Visual Resources.....	14
Table 3.3: Historic Environment.....	27
Table 3.4: Noise and vibration.	33
Table 3.5: Air Quality.	39

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 and 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.
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
30 November 2018	Meeting to discuss outstanding points of discussion – focussing on historic environment and landscape.
07 December 2018	Informal meeting between the Applicant and Norfolk County Council at ISH4
11 January 2019	Meeting between the Applicant and all Local Planning Authorities, as well as Norfolk County Council to discuss the DCO
19 February 2019	Meeting to discuss the Statement of Common Ground – focusing on amenity and landscape.

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	<p>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.</p>	<p>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.</p> <p>Following the meeting held with the Applicant and other relevant planning authorities on 11/1/19 South Norfolk Council is hoping to provide additional wording to the Landscape Management Plan and possibly the Ecological Management Plan, which, if accepted by the other relevant planning authorities, the Applicant and the ExA should reduce some of South Norfolk's concerns about trees and hedgerows (set out in a separate section of the report).</p>	<p>Agreed</p>

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 has submitted 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>The Applicant has continued engagement with SNC and added additional wording into the Outline LP (at paragraph 3.1.1.1) which commits to undertake aboricultural surveys of trees to be removed within the onshore cable corridor pre-commencement. The</p>	<p>South Norfolk Council still considers that the relevant surveys for both hedgerows and trees should not be a matter left until post consent. However, accept Requirement 8 has been reworded to reflect our concerns.</p>	Agreed

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
	<p>outcomes of these surveys would inform the implementation of protective buffer zones (with further details of the nature of such buffer zones set out in section 4.2.2 of the Outline EMP). Where veteran trees are identified within the onshore cable corridor, the Applicant will aim to preferentially protect these features either through micro-siting of the cable trenches or using alternative construction methodology (such as HDD) to cross the feature. Where retention is not possible for these features, removal will be justified as part of the detailed LP(s). The same approach would be applied to important hedgerows which are classified as such due to the presence of standard trees (as replacement trees cannot be planted above the cables). In response to consultation with SNC, the Applicant has also amended references to the buffer zones for trees and hedgerows to be protection zones.</p>		
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> <p>The Applicant has continued engagement with SNC and has provided additional baseline information (including confirmation that no identified Important Hedgerows are categorised as such due to tree features and therefore can be considered 'replaceable'). The Applicant has also added additional wording</p>	<p>South Norfolk Council has no specific points to raise other than it considers that the potential impacts cannot be fully assessed without the benefit of the tree and hedgerow information South Norfolk Council has requested and to enable the ExA to know what they are consenting.</p>	<p>Not Agreed - Final Position for both parties</p>

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
	<p>into the Outline LP (at paragraph 3.1.1.1) which commits to undertake aboricultural surveys of trees to be removed within the onshore cable corridor pre-commencement. The outcomes of these surveys would inform the implementation of protective buffer zones (with further details of the nature of such buffer zones set out in section 4.2.2 of the Outline EMP). Where veteran trees are identified within the onshore cable corridor, the Applicant will aim to preferentially protect these features either through micro-siting of the cable trenches or using alternative construction methodology (such as HDD) to cross the feature. Where retention is not possible for these features, removal will be justified as part of the detailed LP(s). The same approach would be applied to important hedgerows which are classified as such due to the presence of standard trees (as replacement trees cannot be planted above the cables).</p> <p>On this basis, the Applicant considers that sufficient baseline information has either been provided to SNC or will be provided through the pre-construction surveys (in line with other ecological pre-commencement surveys) to provide comfort that appropriate mitigation measures have been identified and will be implemented during the construction phase.</p>		
Assessment methodology	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:		

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
	<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, 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 • 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 (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</p>		

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
	<p>captured within the updated versions of the Outline CoCP, Outline EMP and Outline LP. In respect to trees and hedgerows the mitigation to be implemented will be further informed by pre-construction surveys to be undertaken (as set out in paragraph 3.1.1.1 of the Outline LP).</p>		
<p>Assessment conclusions</p>	<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, 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. The assessment currently assumes a maximum design scenario of removal of trees and hedgerows in all areas where HDD is not proposed, or specific protective measures are not identified within the Outline EMP (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 updated versions of the Outline CoCP, Outline EMP and Outline LP. In respect to trees and hedgerows the mitigation to be implemented will be further</p>	<p>South Norfolk Council does not necessarily disagree but still considers that the relevant surveys for both hedgerows and trees should not be a matter left until post consent. However, accept Requirement 8 has been reworded to reflect our concerns.</p>	<p>Not Agreed – Final position of both parties</p>

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
	<p>informed by pre-construction surveys to be undertaken (as set out in paragraph 3.1.1.1 of the Outline LP).</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 was undertaken in November 2018 with visualisations provided at Annex A.</p>	<p>South Norfolk Council considers that the viewpoint/visualisation provided, adequately demonstrates the likely visual effect from this one view point and equally that it would decrease the openness within the Norwich Southern Bypass Landscape Protection Zone.</p> <p>South Norfolk Council's view is that if the proposed onshore HVDC converter station is constructed any landscape mitigation planting will not adequately mitigate for the loss to the landscape character and visual impacts or the impacts on the setting of Keswick Hall and its parkland (this point is covered in the Historic Environment section below).</p>	<p>Agree that this has now been provided.</p>
	<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. It is noted that the landscape management plan would apply to both temporary and</p>	<p>Notwithstanding the outstanding information, South Norfolk Council considers that this is generally acceptable, however South Norfolk Council continue to engage with the Applicant in respect to wording to be included within the Outline LP.</p>	<p>Under discussion</p>

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
	<p>permanent works. Articles 25 and 26 of the DCO contain sufficient powers to enable the Applicant to take possession of land to carry out the maintenance of temporary and permanent landscaping for the duration of the time period specified in Requirement 9(2).</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).</p> <p>The Applicant has reviewed the submissions made by the LPAs relating to the Outline LP and provided an updated Outline LP, Outline EMP and response for review on 26 February 2019, with further updates made and provided for review on 11 March 2019. The Applicant will continue to engage with SNC in respect to the propose amendments and is confident that a position which is agreeable to all parties can be reached.</p>		
	<p>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.</p>	<p>South Norfolk Council agrees with this statement</p>	<p>Agreed</p>
	<p>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.</p>	<p>In relation to purely residential amenity, South Norfolk Council do not disagree.</p>	<p>Agreed</p>

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. The plan should also deal with the planting scheme itself, not merely with the maintenance of the scheme.	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 Applicant considers it appropriate to manage any new or replacement hedgerows planted for a period of 5 years beginning at the point of planting. This is considered appropriate based on evidence provided by the Applicant in their responses to WQ2.7.3	South Norfolk Council consider that the period should be consistent across the project and therefore defer to NNDC for guidance to whether the maintenance period should be 5 or 10 years.	Not Agreed – final position of both parties

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
	<p>and 2.7.5 (REP4-012). The management period would commence at the culmination of the planting works. At the onshore HVDC converter/HVAC substation, the Applicant would inform the relevant planning authority (SDC) when such planting was complete. Along the onshore cable corridor, the Applicant would inform the relevant planning authority once all replacement planting was complete within their local authority boundary. Wording will be incorporated into the Outline LP to clarify this and submitted at Deadline 7.</p> <p>Blocks of woodland have been avoided by either routing, or the use of HDD.</p> <p>Based on the species and age of the woody species selected (as noted in the outline LP), this would give time for a hedge to establish to a height of approximately 2m (accounting for 40-60cm high whips planted and 30cm average growth per year for the first 5 years, according to an EIA quality mark article from the Institute of Environmental Management and Assessment) which would provide full landscape mitigation. As the species-rich mix of plants would be established at this point, this would also be full ecological mitigation. After 5 years, for all locations where hedges may be removed as part of Hornsea Three construction works, failure is very unlikely and the hedges will be restored back to an improved baseline status (species rich and gap filled). Any ongoing maintenance would be comparable to that existing prior to construction and therefore does not need to be secured through the DCO. This is in line with the arrangements in place for restored agricultural land – the responsibility passes back to the landowner.</p>		

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
	<p>The below DCO developments are in Norfolk and have a 5 year landscaping maintenance period:</p> <ul style="list-style-type: none"> • The Norfolk County Council (Norwich Northern Distributor Road) (A1067 to A47(T)) Order 2015; • The National Grid (King's Lynn B Power Station Connection) Order 2013 (Requirement 5(3)); and • Dudgeon offshore wind farm onshore substation and cable TCPA (Condition 6(iv) of appeal decision). <p>We are not aware of any feedback from these projects which suggests this was not appropriate or that mitigation was not achieved. Notwithstanding the above, the Applicant would note that, for the woodland planting at the above ground permanent infrastructure (onshore HVDC converter/HVAC substation and onshore HVAC booster station), the Applicant has committed to replace all plants that die annually at the end of each growing season during the first five years, or when it is agreed that the woodland has established effectively and individual plant replacement is unnecessary. Thus, although the Applicant maintains that failures after the five-year period is unlikely, the provisions for the replacement of any failed plants may extend to the requested ten years, or beyond, at these locations. This is to maintain the level of mitigation provided by the woodland planting at the onshore HVDC converter/HVAC substation, and onshore HVAC booster station.</p> <p>The Applicant would refer to its response to the ExA's second written questions Q2.7.3, which discusses plant growth rate, which is of direct relevance to this point.</p>		

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
	<p>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 detailed in the Outline LMP (APP-181) will be agreed with the SNC as part of the final LMP.</p>	<p>South Norfolk Council does not consider it appropriate to take a view on this matter of detail / personal preference for the resident. South Norfolk Council consider that it is best resolved between the parties directly.</p>	<p>Not within SNC remit</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><i>“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</i></u></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><u>planting to the north-west and south-east of the permanent HVDC converter/HVAC substation (where it connects to the onshore 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 has, in response to SNC's comments, revisited the assessment but the conclusions remain unchanged. A summary of the Applicant's position is provided in Annex B to this SoCG.</p> <p>It is considered that the mis-alignment in these positions is a result of a difference in professional opinion. Notwithstanding this difference in professional opinion, both parties agree that the harm caused to Keswick Hall and its setting would be less than substantial based on the NPPF test, and that 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 agrees that there is a difference of professional opinion and that the harm caused to Keswick Hall and its setting would be less than substantial based on the NPPF test, but disagrees that the mitigation is appropriate or sufficient to mitigate the impact of a 25m in height substation. If the height were to be reduced to 15m through the use of HVAC technology, then the mitigation would be more successful.</p>	<p>Not Agreed – final position for both parties</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>The Applicant would refer to the row above in regard to mis-alignment in professional opinion in respect to Keswick Hall only.</p>	<p>South Norfolk Council would also refer to the above row in regard to the mis-alignment of professional opinion</p>	<p>Not Agreed- final position of both parties</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>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>Agreed subject to the height of the building being 15 metres</p>
	<p>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 this statement</p>	<p>Agreed</p>

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
<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.	Agreed subject to the height of the building being 15 metres

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	The assessment methodology, as outlined in Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement is appropriate. This includes: <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
	<p>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.</p>	<p>South Norfolk Council does not disagree and appreciates that the exact wording of the listed documentation/conditions will be subject to further discussion.</p>	<p>Agreed</p>

The Applicant considers its proposed core working hours are appropriate, when considering the designed-in and committed mitigation as set out in the Outline CoCP. Numerous nationally significant infrastructure projects have accepted working hours commencing from 07:00AM. The majority of which identified below have similar circumstances to that of Hornsea Project Three. Within the eastern region, approved projects with a 07:00 commencement time include:-

- The Galloper Wind Farm Order;
- Palm Paper 3 CCGT Power station Kings Lynn;
- East Anglia THREE Offshore Wind Farm;
- The Progress Power (Gas Fired Power Station); and
- Rookery South (Resource Recovery Facility).

A construction start time of 7am (rather than 8am) provides a mechanism for some of the workforce and vehicle movements to travel outside the standard peak AM traffic movements, helping to minimise impacts on the wider road network. This has been discussed with both Highways England and Norfolk County Council. These measures apply equally to the export transmission corridor, HVDC converter/HVAC substation and HVAC booster station sites. Specific to construction working hours at HVDC converter/HVAC substation, the Applicant does not consider that the locality warrants reduced working hours. The site is already subject to background ambient noise generated by the A47. However, whilst the period of construction works for the HVDC converter/HVAC substation extends over a longer period than for the onshore cable corridor, it is not anticipated that noise generating activities will occur from 07:00 am every day for the full duration.

South Norfolk Council considers that the Core working hours start time of 07:00hrs Monday to Saturday in the Outline Code of Construction Practice should be 08:00am having regard to:

- The close proximity of the works to dwellings at some locations.
- There being included Outline Code of Construction Practice mobilisation period of an hour before and after the Core working hours.
- There being included Outline Code of Construction Practice a maintenance period 13:00 to 17:00 Saturdays.
- Paragraphs 4.1.1.6 and 4.1.1.8 to the Outline Code of Construction Practice contains provisions for longer working hours to be agreed and SNC has indicated to Orsted its willingness to agree longer working hours for locations where there will not be an unacceptable impact on residents or where the overall benefit to residents outweighs the short-term impact.
- SNC has indicated to Orsted its willingness to agree the Core working hours having a later finish time e.g. 7:00pm Monday to Friday in return for the delayed start time.

**Not Agreed –
Final Position of
Both Parties**

Discussion Point	The Applicant's Position	South Norfolk Council's Position	Final Position
<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 The primary areas of interest for South Norfolk Council 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;
 - Potential impacts on landscape and visual receptors as a result of hedgerow and tree removal along the onshore cable corridor; and
 - Potential impacts on amenity as a result of the proposed core working hours.
- 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.

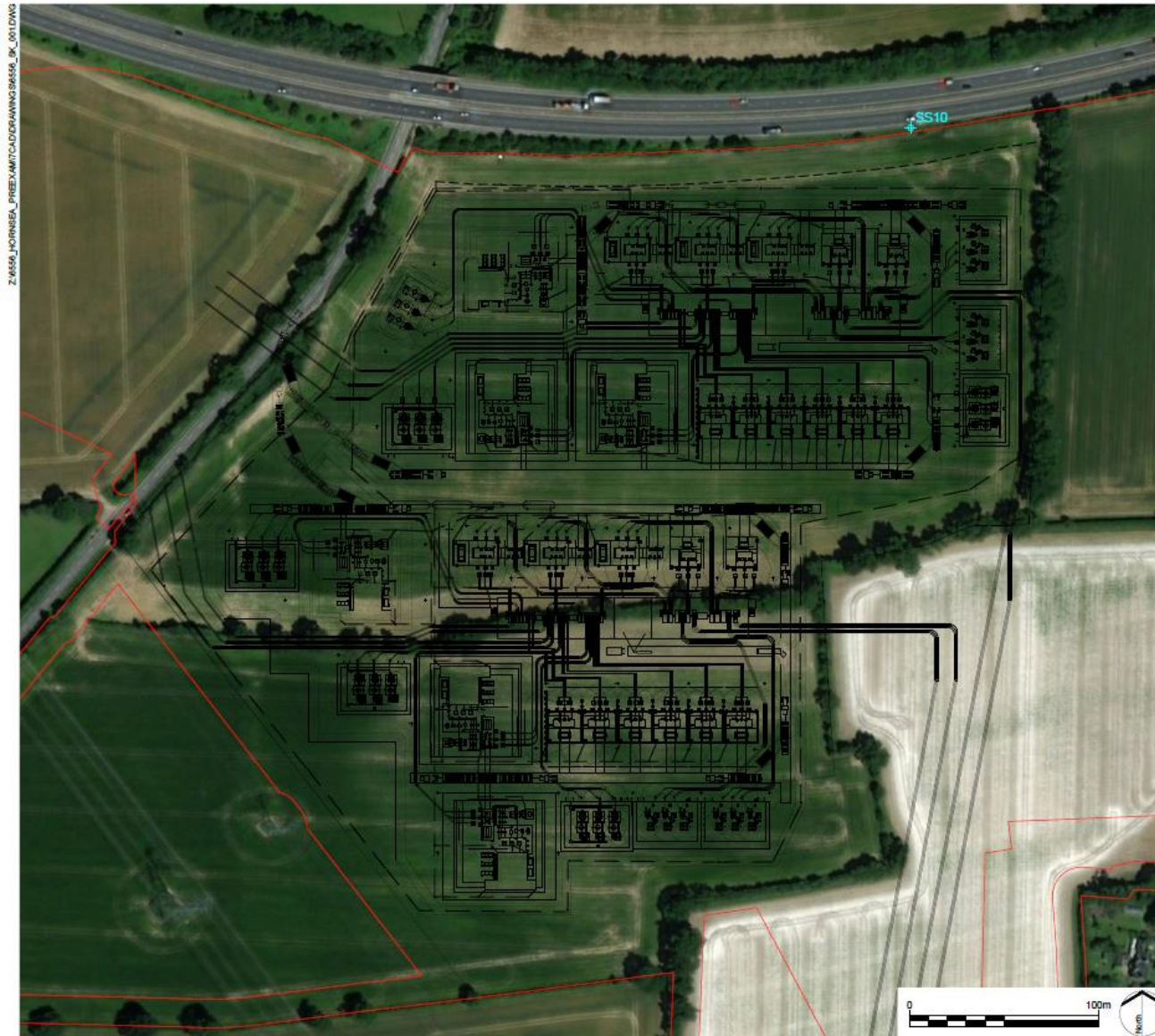
Annex A

The location of the viewpoint is shown in Figure A.1, whilst a copy of the photomontage is shown in Figure A.2 (*note this has been reduced in quality to allow submission within the file size required, but full resolution images were provided to SNC).

The photomontage shown overleaf shows an indicative HVDC converter station (which represents the maximum design scenario in respect to landscape and visual, as well as heritage impacts).

The landscape proposals are as illustrated on Drawing Number 6117_510 of the Outline Landscape Management Plan (Rev 1) [REP1-145]. Woodland planting at year 15 is shown at approximately 4.9m height as stated in Table 3.2 of Volume 6, Annex 4.5 - Photograph Panels, Wirelines and Photomontages of the Environmental Statement [APP-146].

The photomontages do not alter the conclusions of Volume 3, Chapter 4 - Landscape and Visual Resources of the Environmental Statement [APP-076], including effects on users of the A47 set out in paragraphs 4.11.2.88 to 4.11.2.94.



LEGEND

- Order limits
- + Viewpoint Location

A	Viewpoint location as agreed with South Norfolk Council	PB	15.12.18
REV.	DESCRIPTION	APP.	DATE

LD A DESIGN

PROJECT TITLE
HORNSEA PROJECT THREE

DRAWING TITLE
Onshore HVDC Converter/HVAC Substation
A47 Photomontage Viewpoint Location

ISSUED BY	Peterborough	T: 01733 310 471
DATE	Dec.'18	DRAWN JB
SCALE@A3	1:2,000	CHECKED PB
STATUS	Final	APPROVED PB

DWG. NO 6556_SK_001 A

No dimensions are to be scaled from this drawing.
All dimensions are to be checked on site.
Area measurements for indicative purposes only.
© LDA Design Consulting Ltd. Quality Assured to BS EN ISO 9001 : 2008
Sources Ordnance Survey



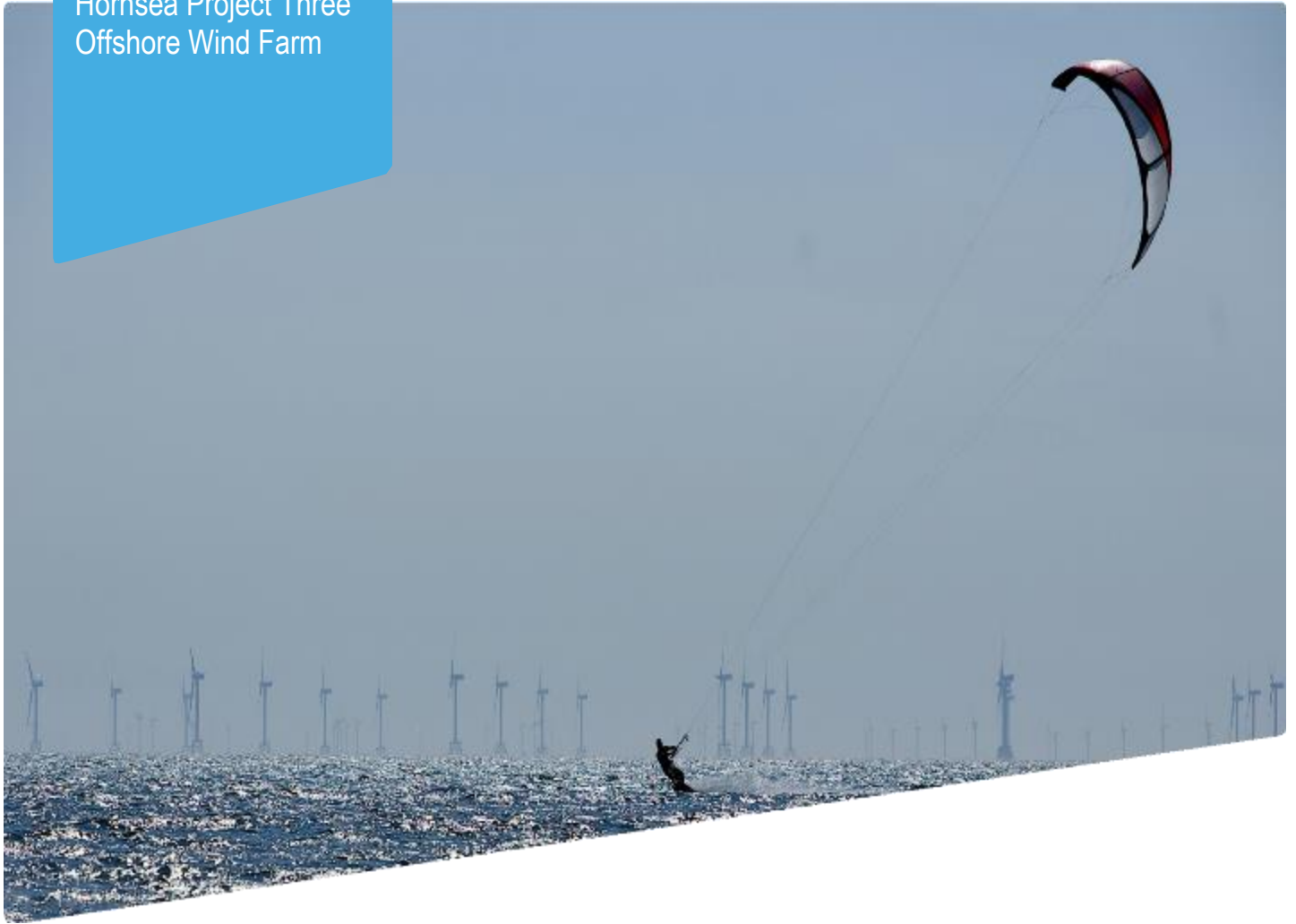
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OS Open data / © Natural England / © DEFRA / © DECC / © English Heritage. Contains Ordnance Survey data © Crown copyright and database right 2015 | Aerial Photography - ESRI, DigitalGlobe, GEOEye, i-cubed, USDA FSA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, the GIS User Community



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Annex B

Hornsea Project Three
Offshore Wind Farm



Hornsea Project Three Offshore Wind Farm

Annex B to the Statement of Common Ground between
Hornsea Project Three (UK) Ltd and South Norfolk Council

Date: January 2019

Hornsea 3
Offshore Wind Farm

Orsted

Document Control			
Document Properties			
Organisation	Ørsted Hornsea Project Three		
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Date	Version	Status	Description / Changes
15/01/2019	1	Final	Final Draft for submission at Deadline 4

Ørsted

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Front cover picture: Kite surfer near a UK offshore wind farm © Ørsted Hornsea Project Three (UK) Ltd., 2019.

Table of Contents

1. Introduction.....	3
2. Applicant’s Position	4
3. Conclusion.....	7
4. References	8

Annex 1: Photographs

Photograph 1: First Edition Ordnance Survey Six-inch to the mile map of 1886 showing Keswick Hall and Parkland

Photograph 2: Satellite image of Keswick Hall and Parkland

Photograph 3: From Keswick Parkland looking northwest towards Keswick Hall

Photograph 4: From Keswick Parkland looking west towards modern development at Keswick Hall

1. Introduction

- 1.1 This document has been prepared to provide context to the final positions of the Applicant, in respect to Keswick Hall and the historic parkland as set out in the Statement of Common Ground.
- 1.2 This document has drawn from, as appropriate, information provided by the Applicant in Volume 3, Chapter 5: Historic Environment (APP-077) of the Environmental Statement, Annex 3 of the Applicant's Comments on Relevant Representations submitted to Deadline 1 (REP1-131), and the Applicant's Comments to South Norfolk Council Local Impact Report submitted at Deadline 2 (REP2-009).
- 1.3 It is clear from written evidence that both SNC and the Applicant agree the following in respect to Keswick Hall:
- the level of sensitivity of the designated asset at Keswick Hall is medium;
 - the onshore HVDC converter/HVAC substation lies outside the immediate setting of Keswick Hall (and further, the Applicant believes that it lies outside the setting of both the hall and the parkland).
- 1.4 This document focuses providing context on those aspects which are not agreed between parties, comprising:
- the level of sensitivity of the parkland at Keswick Hall;
 - the magnitude of impact of Hornsea Three on the setting of Keswick Hall; and
 - the magnitude of impact of Hornsea Three on the setting of the parkland at Keswick Hall.
- 1.5 Despite these points not being agreed, it is important to note that there is broad agreement between SNC and the Applicant that although there would be harm to Keswick Hall and the parkland (as a result of the impact to its setting), the harm is less than substantial in terms of the NPPF test (as there would be no physical harm to the designated asset) and that this harm should be weighed against the public benefits of the proposal.

2. Applicant's Position

Keswick Hall

- 2.1 Keswick Hall is Grade II listed and is of medium sensitivity as documented in Volume 3, Chapter 5: Historic Environment of the Environmental Statement (APP-077). The Applicant considers that the setting of the designated asset (Keswick Hall) is formed by the parkland (i.e. Keswick Hall Parkland). Rather than having views against a backdrop of open countryside. In this regard, the setting does not extend beyond the boundary of the parkland as this is severed by the A47, which forms the southern boundary of the setting. The parkland setting itself has been altered and degraded through the addition of modern development.
- 2.2 There is no physical impact on Keswick Hall as a result of the Hornsea Three onshore HVDC converter/HVAC substation. The Applicant considers that the magnitude of impact on the setting of Keswick Hall would be minor following the methodology set out in Table 5.11 of Volume 3, Chapter 5: Historic Environment of the Environmental Statement (APP-077) i.e. there would be a slight loss within the setting which would lead to a slight loss in the significance of the asset. This is supported by a visualisation from a viewpoint of Keswick Hall as presented in Volume 6, Annex 5.7: Historic Environment Visualisations (APP-155). This shows the existing and proposed views from the designated asset. Existing views show the parkland being partly wooded at its boundary with the A47 road. Proposed views show the buildings of the proposed HVDC converter/HVAC substation. From within the parkland these are partly screened by trees, although the proposed HVDC converter/HVAC substation would be visible from Low Road. This view would not contain the designated asset.
- 2.3 The designated asset benefits from a high degree of screening provided by vegetation in the parkland. This screening is year-round, and is particularly high in summer.
- 2.4 On this basis, the Applicant reaffirms its conclusion in Volume 3, Chapter 5: Volume 5: Historic Environment of the Environmental Statement (APP-077) that the magnitude of impact on the setting of Keswick Hall is minor and the resulting effect is **minor adverse**, which is not significant. It is noted that the adverse impact does not seriously affect any key element of its special architectural or historic interest.
- 2.5 There is agreement between SNC and the Applicant that there would be harm to the asset (as a result of the impact to its setting), however the harm is less than substantial (as there would be no physical harm to the designated asset) and that this harm should be weighed against the public benefits of the proposal.

Keswick Hall Parkland

- 2.6 Although Keswick Hall Parkland is not designated, the parkland at Keswick Hall forms the designed landscape around a country house and may be regarded as a heritage asset in its own right. As such, in response to SNC's comments raised in its Local Impact Report (REP1-100), the Applicant has undertaken a separate assessment of this feature.

- 2.7 Although the parkland does form a designed landscape, it does not have “*lines-of-sight to more distant heritage assets or natural features beyond the park boundary*”, as noted in a critical review by the botanist James Grigor (1811–1848), author of the ‘Eastern Arboretum, or Register of Remarkable Trees, Seats, Gardens, &c., in the County of Norfolk’. This review was highlighted in a recent book by P Dallas in ‘Norfolk Gardens and Designed Landscapes’ (Dallas, Last and Williams, 2013), which examines the history of gardens and parks in Norfolk.
- 2.8 The setting of the parkland is limited in extent, being severed from the wider area by the A47 road and there is no evidence that contemporaries of Gilpin saw areas outside the parkland as adding to its significance prior to the construction of the A47.
- 2.9 Both the parkland and its setting are seriously compromised by modern development within it. This can be seen on the four photographs included in Annex 1. Photograph 1 shows the disposition on 1886 edition of the Ordnance Survey, with Keswick Hall relatively isolated towards the north of the surrounding parkland, with what are presumably service buildings located to its north and northwest. The parkland is bounded by belt planting to the north, west and south; and by roads on three sides. In addition, Bridle Lane bounds the parkland to its west. An extensive area of woodland is shown to the northeast of the principal building. Several tree clumps are shown within the open parkland to the south of the principal building. Photograph 2 is an aerial image of Keswick Hall and parkland showing the current layout, with buildings and other infrastructure adjoining and adjacent to Keswick Hall. Photograph 3 is taken from a location in the parkland looking north-west towards Keswick Hall showing the buildings around Keswick Hall. While Photograph 4, taken from a similar location and looking west towards modern development at Keswick Hall, shows some of the buildings around Keswick Hall and in the western part of the parkland.
- 2.10 On this basis, the Applicant assesses the parkland as an example of a Robust Undesignated Historic Landscape (see Table 5.10 Volume 3, Chapter 5, Historic Environment of the Environmental Statement (APP-077)). The Applicant considers that the parkland is of low sensitivity and because of its comparative degradation and separation from the surrounding landscape mainly useful for providing a setting to Keswick Hall. In addition, the Applicant considers that the setting of the parkland is small, having been severed from the surrounding area by the A47 road.
- 2.11 As described in Dallas, Last and Williamson (2013) “*Keswick Hall is important as one of the few landscapes designed by William Sawrey Gilpin (1762-1843) in the county (see also Wolterton and Gunton)*”. This book is referenced in Volume 6, Annex 5.1: Desk Based Assessment (APP-149) paragraph 1.7.1.49 . Keswick Hall park is also referred to in the Journal of Garden History Vol 22 No2. The picturesque (Winter 1994) pp175-196 – William Sawrey Gilpin (1762-1843): Picturesque Improver.’
- 2.12 In Norfolk, Gilpin is known or suspected to have had some involvement with the following registered parks and gardens: GUNTON PARK, registered at Grade II*, List Entry Number 1000331, located in Alby with Thwaite, North Norfolk; and WOLTERTON HALL, also registered at Grade II*, List Entry Number: 1001022, located in Wickmere, North Norfolk. This is consistent with SNC’s notes in their Local Impact Report that there are few Gilpin landscapes in Norfolk.

- 2.13 Unlike the registered parks and gardens listed in paragraph 2.12 , Keswick Hall Parkland contains and is adjacent to modern development and is not a designated asset. Keswick Hall parkland is degraded and of low sensitivity. As a setting, Keswick Hall Parkland makes a relatively low contribution to the sensitivity of the designated asset (Keswick Hall) in that its design, including its relationship to its setting, was criticised at the time of construction. Development around the principal building and along the west side of Bridle Lane reduces the contribution of setting in these directions, and road noise is very intrusive when within the parkland to the south and south east of the listed building and in the areas of hardstanding to its north.
- 2.14 Hornsea Three would have no physical impact on Keswick Hall Parkland. Furthermore, it benefits from a high degree of screening provided by vegetation in the parkland which is year-round, and is particularly high in summer.
- 2.15 Thus, the Applicant considers that the magnitude of impact would be minor (as described in paragraphs 2.2 to 2.4).
- 2.16 Based on the sensitivity and magnitude identified, the Applicant's assessment on the Keswick Hall Parkland concludes that the effect from Hornsea Three would be at most **minor adverse**, which is also not significant in EIA terms. Although there would be harm to the undesignated asset (as a result of the impact to its setting), the harm is less than substantial in terms of the NPPF test (as there would be no physical harm to the feature).

3. Conclusion

- 3.1 This document provides context to the final positions of the Applicant, in respect to Keswick Hall and the historic parkland as set out in the Statement of Common Ground between parties.
- 3.2 Although the finer details of the assessment (in respect to determining sensitivity and magnitude of impact) are not agreed between the parties due to difference in professional judgement, it is agreed that although there would be harm to the designated and undesignated asset (as a result of the impacts to setting), the harm is less than substantial in terms of the NPPF test (as there would be no physical harm to the designated or undesignated asset) and that this harm should be weighed against the public benefits of the proposal.
- 3.3 Furthermore, it is agreed that 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 by SNC prior to commencement of construction are appropriate. The Applicant notes however that SNC maintain that the mitigation for the onshore HVDC converter/HVAC substation will be more effective under the HVAC scenario (where there is a maximum building height of 15 m), and less effective under the HVDC scenario (where there is a maximum building height of 25 m).

4. References

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Piebenga, S. (1994) William Sawrey Gilpin (1762–1843): Picturesque Improver in Journal of the Garden History Society Vol 22:2 (1994)

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Annex 1: Photographs



Photograph 1: First Edition Ordnance Survey Six inch to the mile map of 1886 showing Keswick Hall and Parkland (Reproduced by permission of the National Library of Scotland)



Photograph 2: Satellite image of Keswick Hall and Parkland (ESRI Basemaps 2016).



Photograph 3: From Keswick Parkland looking northwest towards Keswick Hall



Photograph 4: From Keswick Parkland looking west towards modern development at Keswick Hall