

Hornsea Project Three
Offshore Wind Farm



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Statement of Common Ground between Ørsted Hornsea
Project Three (UK) Ltd. and Historic England

Date: March 2019

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Ørsted

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5 Howick Place,

London, SW1P 1WG

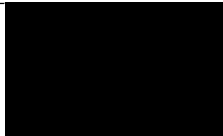
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Front cover picture: Kite surfer near a UK offshore wind farm © Ørsted Hornsea Project Three (UK) Ltd., 2019.

Revision History

Version	Date	Author	Context
1	July 2018	Ørsted	Application accepted for examination: Initial draft for discussion with Historic England
2	December 2018	Ørsted and Historic England	Draft following Written Representation
3	January 2019	Ørsted	Draft following meeting with Historic England 12.12.2018
4	March 2019	Ørsted and Historic England	Final

Signatories

Signed	
Name	Dr William Fletcher
Position	Inspector of Ancient Monuments
For	Historic Buildings and Monuments Commission for England (HBMCE) hereafter Historic England

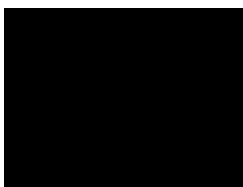
Signed	
Name	Andrew Guyton
Position	Hornsea Project Three Consents Manager
For	Ørsted Hornsea Project Three (UK) Ltd

Table of Contents

1. Introduction.....	1
Overview.....	1
Approach to SoCG.....	1
Hornsea Three.....	2
2. Consultation	3
Application elements under Historic England’s remit	3
Consultation summary	3
3. Agreements Log (Offshore)	5
Marine archaeology	5
Historic seascape character.....	5
4. Agreements Log (Onshore)	16
Onshore historic environment	16
5. Summary	21

List of Tables

Table 2.1: Pre-application consultation with Historic England.....	4
Table 2.2: Post application consultation with Historic England.	4
Table 3.1: Marine archaeology.....	6
Table 3.2: Historic Seascape Character.....	13
Table 4.1: Onshore historic environment.	16

Acronyms

Acronym	Description
DCO	Development Consent Order
CEA	Cumulative Effect Assessment
CoCP	Code of Construction Practice
EIA	Environmental Impact Assessment
Ex.A	Examining Authority
HSC	Historic Seascape Character
HVAC	High Voltage Alternating Current
HVDC	High Voltage Directional Current
MHWS	Mean High Water Springs
MMO	Marine Management Organisation
NHES	Norfolk Historic Environment Service
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground
WSI	Written Scheme of Investigation

1. Introduction

Overview

- 1.1 This Statement of Common Ground (SoCG) has been prepared by Ørsted Hornsea Project Three (UK) Ltd. ('the Applicant') and Historic England (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 proposed 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 prepared by the applicant and focuses on those issues and matters raised by Historic England within its response to the formal EIA Scoping, the Preliminary Environmental Information Report (Section 42) consultation, conducted as a part of the pre-application consultation process, and written representations and post-application consultation.
- 1.3 The structure of this SoCG is as follows:
- Section 1: Introduction;
 - Section 2: Consultation;
 - Section 3: Agreements Log (Offshore);
 - Section 4: Agreements Log (Onshore); and
 - Section 5: Summary.
- 1.4 It is the intention that this document will help facilitate further 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, with a total generating capacity of up to 2,400 MW 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 HVAC booster station/s (AC transmission option only);
 - Onshore cables; and
 - Onshore 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 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 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 under Historic England's remit

- 2.1 Work Nos. 1 to 5 (offshore works), and 6 to 15 (onshore works) detailed in Part 1 of Schedule 1 of the draft DCO (Document A3.1) describe the elements of Hornsea Three which may affect the interests of Historic England.

Consultation summary

- 2.2 This section briefly summarises the consultation that the Applicant has undertaken with Historic England during the pre-application and pre-examination phases of Hornsea Three. Those technical topics of the development consent application of relevance to Historic England (and therefore considered within this SoCG) comprise:

- Marine Archaeology;
- Historic Seascape Character (HSC); and
- Onshore Historic Environment.

Pre-application

- 2.3 The Applicant has engaged with Historic England 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.
- 2.4 Table 2.1 summarises the consultation undertaken between the parties during the pre-application phase, including consultation through statutory EIA Scoping Exercise conducted by the Planning Inspectorate, 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.
- 2.5 It is noted that in Historic England's EIA Scoping response, they advised that landward of Mean High Water Springs (MHWS), undesignated terrestrial archaeology would be the remit of the Norfolk County Council Historic Environment Service (NHES). In response, the Applicant continued their on-going consultation with NHES, with regular contact during the pre-application phase to provide Hornsea Three updates and discuss the scope and findings of the onshore geophysical surveys. As outlined in Table 2.1, meetings were also held with Historic England on 20 July 2016, 9 February 2017, 6 June 2017, and 3 and 16 November 2017. Historic England was also informed of the results of the onshore geophysical surveys throughout the process.

Post-application

- 2.6 Table 2.2 summarises the consultation undertaken between the parties during the post-application phase.

Table 2.1: Pre-application consultation with Historic England.

Date	Detail
20 July 2016	Meeting to introduce Hornsea Three and approach to consultation with Historic England.
26 October 2016	EIA Scoping Exercise Consultation from Planning Inspectorate
24 November 2016	Historic England letter response to EIA Scoping report.
9 February 2017	Meeting to discuss Hornsea Three updates, the scope of the onshore geophysical survey campaign and to clarify Historic England scoping responses.
6 June 2017	Meeting to discuss Hornsea Three updates to both onshore and offshore activities, programme update, review of data collected in Spring onshore geophysical survey campaign, offshore baseline information and surveys, as well as the scope of PEIR.
26 July 2017	PEIR published by the Applicant for consultation (section 42).
19 September 2017	Historic England letter response providing comments on PEIR.
3 November 2017	Meeting to discuss Hornsea Three updates to both onshore and offshore activities, review of results from October onshore geophysical surveys, Historic England comments to the PEIR for both onshore and offshore matters and to agree how comments were to be addressed in the final application.
16 November 2017	Further PEIR consultation published by the Applicant.
18 December 2017	Letter response from Historic England to further PEIR consultation.
28 February 2018	Focused statutory consultation published by the Applicant.
14 March 2018	Letter response from Historic England to focused PEIR consultation.

Table 2.2: Post application consultation with Historic England.

Date	Detail
24 July 2018	Meeting to discuss the documents submitted as part of the DCO application in relation to marine archaeology and historic environment matters, as well as the draft SoCG.
12 December 2018	Meeting between the Applicant, Historic England and Norfolk County Council Environmental Services to discuss the draft SoCG, management plans and written schemes of investigation.

3. Agreements Log (Offshore)

- 3.1 The following section of this SoCG identifies the level of agreement between the parties for each relevant component of the application (as identified in paragraph 2.1) seaward 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 is used, respectively, in the “final position” column to represent the respective status of discussions.
- 3.2 It should be noted that Section 4 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.

Marine archaeology

- 3.3 Hornsea Three has the potential to impact upon marine archaeology and these interactions are duly considered within Volume 2, Chapter 9: Marine Archaeology of the Environmental Statement (Document A6.2.9). An Outline Offshore Written Scheme of Investigation (WSI) has been prepared, which details the principles to be taken forward prior to construction of Hornsea Three to ensure the protection of the archaeological resource and then to be implemented through the construction, operation and maintenance, and decommissioning phases, and is included in Volume 5, Annex 9.2: Outline Written Scheme of Investigation of the Environment Statement (Document 6.5.9.2).
- 3.4 Table 3.1 identifies the status of discussions relating to marine archaeology between the parties.

Historic seascape character

- 3.5 Hornsea Three has the potential to change HSC and these interactions are duly considered within Volume 2, Chapter 10: Seascape and Visual Resources of the Environmental Statement (Document A6.2.10). Table 3.2 identifies the status of discussions relating to HSC between the parties.

Table 3.1: Marine archaeology.

Discussion Point	The Applicant's Position	Historic England's Position	Final Position
Environmental Impact Assessment (EIA)			
Baseline environment	<p>Sufficient primary and secondary data, as listed in Section 9.6 of Volume 2, Chapter 9: Marine Archaeology of the Environmental Statement, have been collated to characterise the baseline environment seaward of MHWS in Section 9.7 of Volume 2, Chapter 9: Marine Archaeology of the Environmental Statement to inform the EIA.</p> <p>The Applicant can confirm that within Condition 17 (generation assets) and Condition 18 (transmission assets) of the draft DMLs, it has committed to full coverage surveys of the seabed of the areas within which construction activity will take place. The outputs of these surveys will be used to inform the Offshore WSI as outlined within Section 4.8 of the In-Principle Monitoring Plan (as submitted at Appendix 2 of the Applicant's response to Deadline 1). Historic England will therefore have full insight into this data and will have the opportunity of working with the project as it finalises its design.</p>	<p>We acknowledge the detail of the assessment as presented within this chapter, and we are inclined to accept that the data available for the ES was adequate to inform a suitable baseline for the purpose of examination. However, we wish to see further detail regarding the delivery of a full baseline across the entire area to be impacted post-consent. In particular, we note from paragraph 9.6.2.2 that there is a data gap over the area of the cable route where the route has been amended since the Preliminary Environmental Information Report (PEIR). As such, we would wish to see further information clearly demonstrating the area where this data gap exists, and the programme for conducting surveys within these area(s).</p> <p>In this vein, we have therefore provided through the examination comments and amendments to both the Outline Offshore WSI, and the DCO and associated DMLs to facilitate the production of an Offshore WSI post-consent and the programme of further planned survey works to establish a full baseline prior to the commencement of construction activities.</p> <p>We are therefore encouraged to see that many of these amendments have already been incorporated into the draft DCO Version 3.</p>	Agreed

Discussion Point	The Applicant's Position	Historic England's Position	Final Position
Assessment methodology	The potential impacts identified within Section 9.8, Volume 2, Chapter 9: Marine Archaeology of the Environmental Statement represent a list of potential impacts on marine archaeology seaward of MWHS from Hornsea Three.	Historic England have no comment on this	Acknowledged
	The definitions used for magnitude and sensitivity, as outlined in Section 9.9 of Volume 2, Chapter 9: Marine Archaeology of the Environmental Statement, are the selected criteria used for defining magnitude and sensitivity.	We are in general content that Table 9.8 'Maximum design scenario considered for the assessment of potential impacts on marine archaeology' presents a reasonable and comprehensive scenario, based on the baseline environment presented within Volume 2, Chapter 9: Marine Archaeology, and with the impact assessment methodology for archaeological receptors as presented within Section 9.9.	Agreed
	The maximum design scenarios identified for each impact in Table 9.8 of Volume 2, Chapter 9: Marine Archaeology of the Environmental Statement are based on the information presented in Volume 1, Chapter 3: Project Description of the Environmental Statement (Document A6.1.3).	Historic England has no comment on this.	Acknowledged
	The list of projects screened into the cumulative effect assessment (CEA) in Section 9.12.1 of Volume 2, Chapter 9: Marine Archaeology of the Environmental Statement.	Historic England has no comment on this	Acknowledged

Discussion Point	The Applicant's Position	Historic England's Position	Final Position
Assessment conclusions	<p>The assessment of potential changes to the historic environment, known and unknown, as might be encountered within the proposed development area seaward of MHWS, in Section 9.11 of Volume 2, Chapter 9: Marine Archaeology of the Environmental Statement, has determined that no impacts from the construction, operation and maintenance, and/or decommissioning of Hornsea Three will be significant in EIA terms given the implementation of the measures adopted as part of Hornsea Three (outlined in Section 9.10 of Volume 2, Chapter 9: Marine Archaeology of the Environmental Statement).</p>	<p>An assessment of the significance of impacts is presented by receptor and impact type within Section 9.11. Beyond our comment made in reference to paragraph 9.11.1.15 below, we are content that the impact assessment is adequate. Furthermore, we are content with the cumulative assessment, as presented in Section 9.13.</p> <p>Paragraph 9.11.1.15 concludes that the effect of sediment removal or disturbance of sediments on near-surface prehistoric land surfaces will be of minor adverse significance. Whilst we do not altogether disagree with this assessment, we wish to note that this conclusion is subject to the adequate discharge of the measures set out in Table 9.9.</p> <p>Therefore, subject to the production and agreement with Historic England of an Offshore Written Scheme of Investigation (WSI), its implementation and the further analysis and interpretation of data as set out in the Offshore WSI, we are inclined to agree with the summary of the impact assessment as set out in in Section 9.16 'Conclusion and Summary'.</p>	Agreed

Discussion Point	The Applicant's Position	Historic England's Position	Final Position
	<p>The assessment of potential cumulative changes to the marine archaeology environment seaward of MHWS, in Section 9.13 of Volume 2, Chapter 9: Marine Archaeology of the Environmental Statement, has determined that no impacts from the construction, operation and maintenance, and/or decommissioning of Hornsea Three, alongside other projects, plans and activities will be significant in EIA terms.</p>	<p>Historic England is content with the cumulative assessment, as presented in Section 9.13.</p>	<p>Agreed</p>
	<p>Embedded measures were identified in Section 9.10 of Volume 2, Chapter 9: Marine Archaeology of the Environmental Statement as a result of the assessment conclusions.</p>	<p>Section 9.10 'Measures adopted as part of Hornsea Three' and Table 9.12 'Designed-in measures adopted as part of Hornsea Three' describes a number of designed-in measures proposed to reduce the potential for impacts on marine archaeology. In general, we are satisfied that these measures are appropriate based on the data currently available to inform the baseline environment presented within Volume 2, Chapter 9: Marine Archaeology.</p>	<p>Agreed</p>

Discussion Point	The Applicant's Position	Historic England's Position	Final Position
<i>Draft Development Consent Order</i>			
Commitments / restrictions	<p>The commitment to producing an Offshore WSI (Schedule 11, Part 2, Condition 13(2) and Schedule 12, Part 2, Condition 14(2) of the draft DCO), that must be submitted to the Marine Management Organisation (MMO) six months prior to the commencement of construction activities, is an appropriate control measure for detailing the principles to be taken forward prior to construction of Hornsea Three to ensure the protection of the archaeological resource and then to be implemented through the construction, operation and maintenance, and decommissioning phases. The final version of the Offshore WSI will be produced in accordance with the Outline Offshore WSI, industry good practice and in consultation with Historic England.</p>	<p>The provisions for the production and agreement of a Written Scheme of Investigation are set out in Condition 13(2) and Condition 14(2) of Part 2 of Schedules 11 and 12 respectively of the draft DCO. Through the course of the examination, Historic England has returned comments and amendments via our written responses to the Planning Inspectorate on both the Offshore WSI and the provisions within DMLs to ensure the appropriate delivery of the Offshore WSI, as well as supporting documentation such as the In Principle Monitoring Plan.</p> <p>We are encouraged to see that many of the amendments we have requested to the draft DCO have been implemented in subsequent revisions of the document.</p> <p>Our main remaining concern is the transition between the outline and agreed Offshore WSI, which is chiefly being addressed through the draft DCO revisions.</p>	Agreed

Discussion Point	The Applicant's Position	Historic England's Position	Final Position
Monitoring	<p>Pre-construction surveys in-line with Section 7 of Volume 5, Annex 9.2: Outline Offshore WSI are proposed. These include a geophysical survey and the review of material derived from geotechnical survey. Hornsea Three will consult the Retained Archaeologist ahead of finalisation of turbine and infrastructure positions to ensure that known archaeological constraints identified by these surveys are avoided. These interpreted surveys data will inform the final positioning of turbines and other infrastructure in order to avoid heritage assets located within the development area, where possible.</p>	<p>Historic England note the changes made to the draft DCO and DMLs during the examination in relation to pre-construction and post-construction monitoring for archaeology. Subject to the agreement of an adequate Offshore WSI post-consent and the delivery of these monitoring surveys in line the provisions set out in such a WSI and the DMLs, we are content that such measures are considered adequate.</p> <p>Historic England are also content that subject to the agreement of an adequate Offshore WSI post-consent, that the conditions set out within the DCO and DMLs in relation to heritage assets as sufficient to secure the necessary mitigation in the event that avoidance of heritage assets is not possible.</p>	Agreed

Discussion Point	The Applicant's Position	Historic England's Position	Final Position
Outline Management Plans			
Outline WSI	<p>The management measures identified with the Volume 5, Annex 9.2: Outline WSI of the Environmental Statement includes control measures for detailing the principles to be taken forward prior to construction of Hornsea Three to ensure the protection of the archaeological resource and then to be implemented through the construction, operation and maintenance, and decommissioning phases.</p> <p>It is agreed that no further updates to the Outline Offshore WSI are required during the Examination and that further updates and refinement of the document will be incorporated and provided as a final WSI to be submitted for approval to the MMO in consultation with by HE, post consent in line with the provisions set out in the DMLs.</p>	<p>Historic England has provided comments and amendments on the Outline Offshore WSI during the course of the examination process, and agrees that the revision of the Offshore WSI in line with such comments will be incorporated into a final document for approval, post consent in line with the provisions set out in the 'DMLs.</p> <p>As such, subject to the inclusion of the following text within the Outline Offshore WSI to be submitted as part of the examination, Historic England accepts the Outline Offshore WSI as a certified document: <i>"This Outline Offshore WSI has been developed following detailed engagement with stakeholders during pre-application and the examination phase. The Outline Offshore WSI will form the basis on which detailed Offshore WSI which will be prepared during the detailed design phase, post-consent/pre-commencement of works in consultation with Historic England."</i></p> <p>Appropriate reference to the Offshore WSI should also be included within the In Principle Monitoring Plan and 'vessel pack'.</p>	Agreed

Table 3.2: Historic Seascape Character.

Discussion Point	The Applicant's Position	Historic England's Position	Final Position
EIA			
Baseline environment	Sufficient primary and secondary data, as listed in Section 10.6 of Volume 2, Chapter 10: Seascape and Visual Resources of the Environmental Statement, have been collated to characterise the baseline environment in Section 10.7 of Volume 2, Chapter 10: Seascape and Visual Resources of the Environmental Statement to inform the EIA.	Historic England note the use of up-to-date published data in the characterisation of the Hornsea Project Three Historic Seascape Character (HSC) as one component of seascape and visual resources, and are content with the data presented.	Agreed
Assessment methodology	The potential changes identified within Section 10.8 of Volume 2, Chapter 10: Seascape and Visual Resources of the Environmental Statement represent a list of potential changes on HSC from Hornsea Three.	Historic England acknowledges the potential changes to the HSC as a result of the construction of the wind farm, from the Broad Character Types (BCT) Industry – Hydrocarbon Pipeline and Installation, to Industry – Renewable Energy Installations.	Agreed
	The definitions used for magnitude and sensitivity, as outlined in Section 10.9 of Volume 2, Chapter 10: Seascape and Visual Resources of the Environmental Statement, are the criteria selected for defining magnitude and sensitivity.	Historic England has no comment on this.	

Discussion Point	The Applicant's Position	Historic England's Position	Final Position
	<p>The maximum design scenarios identified for each impact in Table 10.8 of Volume 2, Chapter 10: Seascape and Visual Resources of the Environmental Statement are based on the information presented in Volume 1, Chapter 3: Project Description of the Environmental Statement.</p>	<p>We are generally content that Table 10.8 presents a reasonable and comprehensive scenario, based on the baseline environment presented within Volume 2, Chapter 10: Seascape and Visual Resources of the Environmental State.</p>	<p>Agreed</p>
	<p>The list of projects screened into the CEA in Section 10.12.1 of Volume 2, Chapter 10: Seascape and Visual Resources of the Environmental Statement are appropriate.</p>	<p>Historic England has no comment on this.</p>	
<p>Assessment conclusions</p>	<p>An assessment has been made of potential changes to HSC and it has been determined that no changes from the construction, operation and maintenance, and/or decommissioning of Hornsea Three will be significant in EIA terms.</p>	<p>Historic England is content with the assessment that no changes are significant in EIA terms. Nevertheless, the change described within the assessment does specific a change between the BCT and its sub-types. In particular, a change from Hydrocarbon Pipelines and Installations to Renewable Energy Installation. This change would still require mitigation.</p>	<p>Agreed</p>

Discussion Point	The Applicant's Position	Historic England's Position	Final Position
	<p>An assessment has been made of potential cumulative changes to HSC, in Section 10.13 of Volume 2, Chapter 10: Seascape and Visual Resources of the Environmental Statement, and it has been determined that no changes from the construction, operation and maintenance, and/or decommissioning of Hornsea Three, alongside other projects, plans and activities will be significant in EIA terms.</p>	<p>Historic England is content with the assessment.</p>	<p>Agreed</p>
	<p>It is agreed that recording of the change to the HSC should be included within the decommissioning plan and that the Applicant and HE will work together post consent to determine a reasonable means of recording change to the HSC.</p>	<p>Historic England has identified that a change resulting from the development will occur to the BCT sub-type for Industry. It is therefore necessary for this change is appropriately recorded.</p>	<p>Agreed</p>
<i>Draft Development Consent Order</i>			
<p>Commitments / restrictions</p>	<p>No specific commitments are required within the DCO to mitigate effects on HSC.</p>	<p>Historic England has no comment on this.</p>	
<p>Monitoring</p>	<p>No monitoring commitments are required within the DCO to monitor effects on HSC.</p>	<p>Historic England has no comment on this.</p>	

4. Agreements Log (Onshore)

- 4.1 The following section of this SoCG identifies the level of agreement between the parties for each relevant component of the 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.
- 4.2 It should be noted that Section 3 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) seaward of MHWS.

Onshore historic environment

- 4.3 Hornsea Three has the potential to impact upon onshore historic environment assets and their settings, and these interactions are duly considered within Volume 3, Chapter 5: Historic Environment of the Environmental Statement (Document A6.3.5). An Outline Code of Construction Practice (CoCP), Outline Onshore WSI, and an Outline Landscape Management Plan (LMP) have been prepared, which capture all relevant management and mitigation measures associated with this topic during the construction phase, and are included as part of the DCO application with a revision produced at Deadline 5 and 6.
- 4.4 Table 4.1 identifies the status of discussions relating to the onshore historic environment between the parties.

Table 4.1: Onshore historic environment.

Discussion Point	The Applicant's Position	Historic England's Position	Final Position
<i>Design, Site Selection and Route Refinement</i>			
Site selection of the onshore HVDC converter/HVAC substation	The sites selected for the onshore HVAC booster station and onshore HVDC converter/HVAC substation has avoided direct impacts on designated heritage assets.	Agree	Agreed
Route of Hornsea Three onshore cable corridor	The onshore export cables will be buried to minimise any effect on the settings of heritage assets. The Hornsea Three onshore cable corridor was refined from 200 m, as reported in the PEIR, to 80 m in the DCO application to minimise the potential impact on undesignated archaeological assets. Furthermore, the Hornsea Three onshore cable corridor was refined during the pre-application phase to take into consideration comments received through the statutory consultation process in respect to avoidance of designated heritage assets (i.e. to run further to the west at Salle so that it does not run between the listed church and Registered Park and Garden). The route selected for the Hornsea Three onshore cable corridor is therefore appropriate given its avoidance of recorded undesignated archaeological and designated heritage assets.	Agree	Agreed

Discussion Point	The Applicant's Position	Historic England's Position	Final Position
EIA			
Baseline environment	Sufficient primary and secondary data, as listed in Section 5.6 of Volume 3, Chapter 5: Historic Environment of the Environmental Statement, have been collated (using appropriate methods) to characterise the baseline environment landward of MHWS in Section 5.7 of Volume 3, Chapter 5: Historic Environment of the Environmental Statement to inform the EIA. The description of the baseline is adequate for the purpose of this project.	Agree	Agreed
Assessment methodology	The potential impacts identified within Section 5.8 of Volume 3, Chapter 5: Historic Environment of the Environmental Statement represent a comprehensive list of potential impacts on the onshore historic environment landward of MWHS from Hornsea Three.	Agree	Agreed
Assessment conclusions	An assessment has been made of potential changes to the onshore historic environment landward of MHWS during the construction, operation and maintenance and decommissioning of Hornsea Three, in Section 5.11 of Volume 3, Chapter 5: Historic Environment of the Environmental Statement, including 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).	Agree	Agreed

Discussion Point	The Applicant's Position	Historic England's Position	Final Position
	The assessment of potential cumulative effects on the onshore historic environment landward of MHWS in Section 5.13 of Volume 3, Chapter 5: Historic Environment of the Environmental Statement has been provided.	Agree	Agreed
Draft Development Consent Order			
Outline Management Plans			
Outline CoCP - Management & Mitigation Measures	The management measures identified within the Outline CoCP are appropriate for managing construction impacts on the onshore historic environment. The final CoCP will be approved by the relevant LPAs.	Agree that additions to the Outline LMP have been made to include Historic Environment impacts.	Agreed
Outline LMP – Management and Mitigation Measures	Management measures have been identified within the Outline LMP for managing construction impacts on the onshore historic environment. Following feedback from Historic England, the following paragraphs of the Outline LMP will be updated to read as follows (<i>italics</i>): 1.1.1.2 This Outline LMP is the framework to agree detailed masterplans and operations for the management and maintenance of the soft landscape <i>and heritage mitigation</i> proposals (planting and seeding) for the onshore HVAC booster station (if required) and onshore HVDC converter/HVAC substation, and management and maintenance of hedges and trees replaced and additional planting along the onshore cable corridor to ensure that the design and mitigation intent	Agree with update to the Outline LMP text to reference heritage impacts and review of screening at HVDC converter/HVAC substation site.	Agreed

Discussion Point	The Applicant's Position	Historic England's Position	Final Position
	<p><i>for landscape and heritage impacts</i> is realised. The landscape proposals and management prescriptions will provide the necessary information to help ensure successful establishment and growth of proposed planting and seeding.</p> <p>1.1.1.3 This Outline LMP describes management to be carried out during the first five years following planting and seeding, <i>and longer term with regards to woodlands providing screening to permanent assets.</i></p> <p>5.3.2 xxiv (new paragraph) <i>Historic England have requested to view the longer term effects of screening at the HVDC converter/HVAC substation with regard to heritage mitigation and will be granted access to the site providing they give reasonable notice.</i></p> <p>The final LMP will be approved by the relevant LPAs.</p>		
Outline Onshore WSI	An Outline Onshore WSI is under discussion with NCC, in consultation with Historic England, and will be submitted to the ExA prior to the close of Examination. NCC will approve the final version pre-commencement in consultation with Historic England.	Agree	Agreed

5. Summary

5.1 To be drafted following Historic England's review/feedback on the draft SoCG.