

PLANNING ACT 2008

INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

**WRITTEN SUBMISSIONS OF NFU REGARDING THE HORNSEA PROJECT THREE OFFSHORE
WIND FARM DEVELOPMENT CONSENT ORDER 201 [...]**

PLANNING INSPECTORATE REFERENCE NO EN010080

**SUBMISSION OF NATIONAL FARMERS UNION ON
22nd JANUARY 2020**

DATE 22nd JANUARY 2020

1.0 Introduction

1.1 Submissions on behalf of the National Farmers Union (“NFU”) and the Land Interest Group (LIG) in respect of the application for a Development Consent Order (DCO) by Orsted Hornsea Project three (UK) Limited for the Hornsea project Three Offshore Wind Farm. The NFU is making a case on behalf of its members who are affected by the DCO.

2.0 Further Submission

2.1 The NFU would like to raise the following concerns in regard to two issues which have arisen since the end of the examination period.

2.3 **OFTO**

NFU is now aware that Orsted are seeking two leases however they have been unable to provide any indication of how many OFTO’s will be involved. The NFU is concerned there is the possibility of each lease being transferred to two different OFTO’s. This would mean a landowner would have to deal with two different entities when dealing with post construction and maintenance issues such as crop loss and remedial works which will be logistically challenging for landowners. A request is made for a joint managing agent to be engaged so that all agents, landowners and occupiers would only need to deal with one point of contact which a joint managing agent would provide.

2.4 **CUMULATIVE IMPACT – CROSSING POINT**

Orsted have not engaged with Vattenfall or the landowner on the principle agreed with NFU and LIG for the configuration of the cables at the crossing point.

The principle is that the project with the least number of cables/circuits (rather than the lesser width) will carry out the installation method by trenchless crossing and be below the other project. Therefore, the project with the most cables/circuits will use an open cut trench method and be located above the other project.

However, if there is a good technical reason, such as being beneficial for overall thermal efficiency, it may be that the project with the least cables/circuits would be more appropriately located above the other project. In the case where only one project goes ahead (i.e. being Hornsea Project Three or Norfolk Vanguard and/or Norfolk Boreas, the project to be constructed, will be installed using open cut methods within the subsurface.

Vattenfall have stated that the most thermally efficient crossing design and the least disruptive construction method is key to Norfolk Boreas and Norfolk Vanguard. It is imperative that Orsted, Hornsea 3 agree to this as well from a landowners concern.

For this to be enforceable Orsted need to be party to the agreement.