



EAST RIDING

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Dear Sir or Madam

**INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2009 SI 2263 (as amended) (the EIA Regulations)
PROPOSED HORNSEA PROJECT FOUR OFFSHORE WIND FARM
BY ORSTED HORNSEA PROJECT FOUR LIMITED**

**East Riding of Yorkshire Council comments on the Hornsea Project Four Offshore
Wind Farm Environmental Impact Assessment Scoping Report October 2018**

Firstly please accept the apologies of East Riding of Yorkshire Council (ERYC) for the late response to the consultation on the Scoping Report. The consultation was not received by the correct department and was therefore missed. I was alerted to this in early December 2018. Internal consultations were subsequently carried out however unfortunately the responses were delayed by the 2 week Christmas break. I now have all the appropriate responses back and can provide a comprehensive response. In the meantime ERYC has been in regular dialogue with the Applicants who are fully aware of the main issues which may affect their forthcoming Preliminary Environmental Information Report.

Please note the comments below are Officer led and made on a without prejudice basis, and ERYC reserves the right to make further comments throughout the ongoing Development Consent Order process.

General Comments

The Scoping Report is considered very comprehensive and includes the issues ERYC would expect to see in an Environmental Impact Assessment (EIA). The proportionate approach taken where certain aspects can be scoped out is considered appropriate. The Impacts Register and Commitments Register are useful tools to provide an easy to read summary. The Scoping boundary with buffers is appropriate. The Rochdale Envelope approach is appropriate for this type of project where technological advances can result in amendments to final design and

construction, and some flexibility is required. The consideration of the worst case scenario in the EIA process is appropriate.

ERYC provide comments relating to the onshore elements of the proposal only. The site selection process is fully detailed and reasoned. The onshore elements would be entirely within the ERYC administrative area; the landfall, the cable route and the substation/energy balancing infrastructure.

ERYC has previously provided comments on the Statement of Community Consultation and is satisfied with the approach taken and the consultation events undertaken so far.

In terms of the Evidence Plan process, ERYC are on the Steering Group and two meetings have taken place so far.

Water Resources and Flood Risk

The Lead Local Flood Authority have assessed the Scoping Report and have no further comments.

The area around the substation is of varied flood risk designation and there are significant areas of groundwater source protection zones around Cottingham. A flood risk assessment and hydrogeological risk assessment should be included. Details of surface water management around the substation should be considered as early as possible and in accordance with the hierarchy of sustainable drainage.

HDD should be utilised for all major watercourses to avoid significant effects.

There are currently no other flood defence works planned or LLA operated/maintained defences than those identified. Note the Cottingham and Orchard Park Flood Alleviation Scheme is still ongoing but is not within the scoping boundary (although is close to the substation area) and will be complete in the timescales of the project (by the end of 2019). Information about the scheme is attached.

The route of the cable runs through several Internal Drainage Board areas and their views on the Scoping Report should be sought.

Ecology and Nature Conservation

Local Wildlife Sites – the list of 48 sites should be reviewed as there have been changes; some have been deleted as they no longer meet the quality criteria. This follows a review of the LWS's in 2018. The Councils Nature Conservation Officer will provide confirmation of the up to date sites.

Great Crested Newts – It is understood that an eDNA survey only will take place, however if results are positive then further assessment and mitigation would be necessary.

Protected Species - Survey of optimal watercourses only – smaller ditches should not be dismissed from surveys if previous data suggests presence of protected species.

ERYC concur with the response given by Natural England. Liaison is also strongly advised with Yorkshire Wildlife Trust.



Landscape and Visual Assessment

The 2005 ERYC Landscape Character Assessment has now been replaced by a 2018 version.

It is agreed that significant landscape and visual effects would arise from the substation area of the project and therefore ZTV and visualisations would be necessary as part of the EIA. Effects of the construction of the (fully below ground) cable route and landfall can be scoped out as being temporary.

Due to distances involved onshore impacts from the turbines themselves and HVAC booster can be scoped out.

The correct landscape designations have been identified. The local landscape designation most affected would be the Yorkshire Wolds. The nearest AONB, the Howardian Hills, can be scoped out due to distances involved. The Flamborough Head Heritage Coast is an important consideration in terms of views offshore, and to scope out the potential impact should be demonstrated by suitable visualisations. Impacts of onshore works would be temporary and can be scoped out.

Viewpoints should be agreed in advance with the Council once the location of the substation area is known as it currently covers a very wide area. The western part of the area lies within the Wolds. Elsewhere the land is low lying and long distance views are possible. Public right of ways cross the area which increases the visual impact. Drivers and users of the railway should also be considered. In terms of heritage assets, views of the Grade I Listed Beverley Minster and between St Marys Church in Cottingham are very important.

Heritage Assets

The Council's Conservation Officer has responded as follows:

In respect of the questions asked in para 7.5.9.1 of the Scoping Report:-

1. This is generally acceptable, subject to the comments below. I have concerns firstly about the lack of identification of non-designated built heritage structures and secondly about the creation of the compound areas referred to in the last bullet of 7.5.4.1 and feel the latter need to be assessed the same as any other affected area and any underlying features avoided or further investigation/recovery archaeology needed, carried out.
- 2.No - the mapping in Annexe I for the heritage section is inaccurate and all the assets are shown out of position by approximately 100 metres, just south of east. Whether this applies to all the mapping I am not sure, but certainly applies to all the designated heritage asset information. The information on non-designated heritage assets in the form of buildings or standing structures, (see 1 above), is limited and not generally included in the HER within the East Riding. We rely on identification of these at the application stage. Whilst such structures, unless lost or damaged, are unlikely to be impacted on by the cable route, they may be affected by the land fall or sub-station work, along with their settings. Further comments on this can be provided, once the additional

information from the further surveys are received and the landfall and substation locations are firmed up.

3. Listed buildings, SAMs, Conservation Areas, non-designated heritage assets in the form of buildings or structures and any standing/visible archaeology. Impact on setting will be limited other than short term, except potentially for the sub-station and possible landfall point. Listed Buildings, Parks and Gardens or SAM's with a wider setting or inter-related setting, (such as church towers) are most likely to be affected by above ground structures.
4. Enclosure Award data has been mentioned in the scoping report, but not expanded upon. Historic mapping can identify the presence of older structures which may be non-designated heritage assets as well as clues to the landscape use and changes over time. Access to the Historic landscape Characterisation Study (HLC) through Humber Archaeology will help with this. Thematic consideration can identify later structures, which may be non-designated heritage assets, WW1 and WW2 assets have been identified and flagged up already, as areas for further investigation. Other examples could be, for example and not exhaustive, Millennium Beacons, War or other memorials not within settlements and not listed, early examples of technological solutions (e.g. concrete bridges, water towers etc).
5. Not totally, a greater level of analysis including below ground works may be necessary. Experience in the area of other highway infrastructure, pipeline and cable route projects and the finds thrown up has shown this to be the case.
6. See 4 above.

Comments on archaeology have been provided separately by Humber Archaeological Partnership.

Land Use and Agriculture

No comments to make.

Traffic and Transport

ERYC Highway Officers and Engineers have been in regular contact with the Applicant regarding traffic and access. The extent and details of the road network scoped in is acceptable as is the method of baseline data collection.

Regarding data collection ERYC can make certain data available and this is in hand.

Abnormal load arrangements would be dealt with once a route is known via the Council's Abnormal Loads officer, however as the most likely route being from the Port of Hull and would include the A63/M62 Highways England and Hull City Council should also be involved.

There are a number of committed developments and planned schemes particularly in the area of the substation, A164 and A1079. A meeting has taken place and contacts given regarding future schemes taking place on the Strategic Road Network. The most important and disruptive being the 'Jocks Lodge' A164 / A1079 junction scheme, and upgrades to the A164. The potential timescale of the works could be at a similar time to the potential timescale for the proposed construction of the substation access and cumulative impacts should be scoped in.

Works have recently commenced further south on the A164 and are likely to be complete by the time the scheme is at DCO submission stage. Works are also planned for two new roundabouts on the Beverley Southern Relief Road section of the A164 (Minster Way) in the next 2 years.

The A63 Castle Street footbridge is within Hull City Council's area and is currently under construction and likely to be complete by the time of DCO approval. The improvement scheme to Castle Street is currently with the Planning Inspectorate with DCO hearings recently taking place and it is advised that the timescales for its construction are assessed.

Public Rights of Way

Public Rights of Way are dealt with by the Council's Countryside Access team who have made the following comments:

The Countryside Access Team request that condition surveys with photographs are carried out on all public rights of way (PRoW) before any work commences. Once work is completed the condition of the PRoW should be returned to the same or better condition, ensuring that surfaces are firm and level with grass or previous surface restored to ensure it is safe and to the satisfaction of the Countryside Access Team as highway authority. The DCO should have powers included to carry out Traffic Regulation Orders for the temporary closure and diversion of the affected PRoW to ensure that no undue burden is placed on the authority with regards to advertising, posting and checking of the legal notices required for the orders. Each path affected by the works should have a temporary diversion route agreed by the Countryside Access Team and timescale for each individual path closure is kept to a minimum to reduce the disruption to users and the network. Any PRoW used by the contractors, with agreement of the landowners, as access to the construction site should be maintained during the works to a firm and level surface so that it is safe for the public to enjoy.

The Definitive Map Team should be contacted for the provision of the legal records for the status and location of the PRoW.

Noise and Vibration

The Council's Public Protection Officers have considered the Scoping Report and are agreeable with the approach and the potential impacts. Suitable noise assessment locations have been agreed separately with the Applicant.

Land Contamination

The following comments have been received from the Council's Public Protection Officers :

At 7.1.3.11 the scoping report acknowledges the potential areas of contamination within the study area and proposes these will be further assessed during the PEIR upon review of environmental information. Later, at 7.1.8.1 (Proposed approach to the PEIR and ES), the report proposes a desk-based review of available environmental information followed with a site walkover of those areas where the desk-based study indicates this is necessary. No detailed assessment, such as intrusive ground investigation(s), is proposed; a Conceptual Site Model (CSM) is to be established to compare with the baseline environment and with the identified activities during construction, operation and decommissioning phases.

At 7.1.7.4 (Construction workers exposure to contamination resulting in health risks) the potential for construction workers to be exposed to unknown sources of contamination is acknowledged, but the report proposes this can be scoped out of the assessment as embedded mitigation measures, including PPE, will create a necessary barrier and result in a negligible impact. A variety of potential sources of contamination have been identified within the on-shore development area and it will not always be the case that visual and/or olfactory indicators of the presence of contamination will be apparent. Analysis of samples of soil, water and/or ground gases may be required to assess the contamination at individual sites. Buried organic matter will be of particular concern as it has the potential to generate methane and carbon dioxide, meaning sites located in the vicinity of refuse tips may be at risk from ground gases. Similarly, free fibres of asbestos cannot be seen, so the absence of visible asbestos containing material (ACM) does not necessarily mean that asbestos is not present in the soil. Sampling for asbestos is required, on all sites where a potential pollutant linkage has been identified, to ensure that it is not dispersed in the soil. If asbestos is identified it must be quantified.

Sufficient information will be required in order to assess any risks to controlled waters. As part of the site investigation the observed levels of contaminants should be compared to water quality standards, for example environmental quality standards (EQS) or drinking water standards (DWS), and further risk assessment using the Environment Agency's Remedial Targets Methodology and/or remediation may be required.

I would recommend, therefore, that, rather than being scoped out of the Environmental Statement (ES), all aspects of investigations into possible land contamination should follow the guidelines within CLR11 Model Procedures for the Management of Land Contamination (Environment Agency, 2004), in line with current best practice.

Local Air Quality

The following comments have been received from the Council's Public Protection Officers :

The nature of the operational phase is such that it is unlikely to result in significant impacts on air quality and I agree it will be appropriate for this element to be scoped out of the ES. For the construction and decommissioning phases of development, the nature of activities and types of machinery / plant involved represent a risk of potentially significant, negative impacts at sensitive receptor locations from dust and/or vehicle emissions. It will be inappropriate, therefore, to scope these elements out of the ES and an assessment of impacts from emissions to air during construction and decommissioning phases should be included.

Socio-Economic Issues

It is agreed that the Socio-Economic issues set out could be addressed by other EIA topics.

ERYC will consider the benefits of the project when submitting its Local Impact Report, and these should be set out clearly in a socio-economic impact assessment. The issues set out in question 3 can be scoped out, and the primary focus on the effects on employment and the economy as a whole.



There are recognised mechanisms for projects like Hornsea Four to provide/enhance benefits for the East Riding of Yorkshire Council, specifically the Northern Forest. The contact for this project at ERYC is Stephen Robinson. This and the HEYwoods tree planting initiative have proved successful for other projects.

No comments on socio-economic impact of decommissioning.

Cumulative Effects

The sources of information for other developments with potential for a cumulative impact as set out in paragraph 8.4.3.1 is acceptable however the East Riding Local Plan allocated sites as shown on the Policies Map and detailed in the Allocations Document have been omitted. In particular there are a number of very large housing allocations in the vicinity to the south of Beverley, and also several major sites on the northern edge of Cottingham.

The map at figure 8.1 misses off several large developments which have been recently approved or currently in planning. These can easily be found via a map search on Public Access. The housing developments south of Beverley (within BEV-J and BEV-K) have major highway schemes on the A164 Minster Way associated with them.

Other major highway schemes that did not have a planning application should also be detailed including those recently commenced on the A164 including Swanland roundabout and Ripplingham Road improvements.

Information about Jocks Lodge major highway improvement scheme can be found here : <https://www.eastriding.gov.uk/council/plans-and-policies/other-plans-and-policies-information/transport/a164-jocks-lodge-junction-improvement-scheme/>

There are a number of 'peaking plant' developments that have been approved around Creyke Beck but not yet implemented that also need to be included. One has been constructed west of Creyke Beck and another under construction (Park Lane access). One has been approved east of Creyke Beck off Dunswell Road. Another has been approved off Dunswell Lane, just to the north of the A1079. These can all be looked at on Public Access.

The current status of the Dogger Bank Creyke Beck development (DCO approved 2015) is that the Council is in regular discussions with the applicants and shortly expect an application for discharge of requirements so that a start can be made within a year.

I trust the above is helpful.

Yours sincerely



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