

Hornsea Project Three  
Offshore Wind Farm



## Hornsea Project Three Offshore Wind Farm

Consultation Report

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Planning Act 2008, s37(7)

Date: May 2018

  
**Hornsea 3**  
Offshore Wind Farm

 **Orsted**

## Reports

### Consultation Report

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This report is also downloadable from the Hornsea Project Three offshore wind farm website at:

[www.hornseaproject3.co.uk](http://www.hornseaproject3.co.uk)

Ørsted

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## Glossary

Term	Definition
Cable corridor	The specific corridor of seabed (seaward of Mean High Water Springs (MHWS)) and land (landward of MHWS) from the Hornsea Three array area to the Norwich Main National Grid substation, within which the export cables will be located.
Code of Construction Practice (CoCP)	A document detailing the overarching principles of construction, contractor protocols, construction-related environmental management measures, pollution prevention measures, the selection of appropriate construction techniques and monitoring processes with three sections covering the offshore, intertidal and onshore environments.
Construction Traffic Management Plan(s)	A plan(s) managing construction traffic, including protocols for delivery of Abnormal Indivisible Loads to site, personnel travel, measures for road cleaning and sustainable site travel measures relevant to those works.
Cumulative effects	The combined effect of Hornsea Project Three in combination with the effects from a number of different projects, on the same single receptor/resource.
Cumulative impact	Impacts that result from changes caused by other past, present or reasonably foreseeable actions together with Hornsea Project Three.
Design Envelope	A description of the range of possible elements that make up the Hornsea Project Three design options under consideration, as set out in detail in the project description. This envelope is used to define Hornsea Project Three for Environmental Impact Assessment (EIA) purposes when the exact engineering parameters are not yet known. This is also often referred to as the "Rochdale Envelope" approach.
Development Consent Order (DCO) as made	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Projects (NSIP).
Draft Development Consent Order (DCO) as submitted with the application	A draft order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Projects (NSIP) as submitted with the application.
DONG Energy Hornsea Project Three (UK) Ltd	The company promoting the development of the Hornsea Project Three offshore wind farm. DONG Energy Hornsea Project Three (UK) Ltd is owned by DONG Energy Power (UK) Limited, which is owned by DONG Energy Vind A/S, which is owned by DONG Energy VE A/S, which is owned by DONG Energy Wind Power A/S, which is owned by DONG Energy Wind Power Holding A/S, and which is owned by DONG Energy A/S.
Drainage Management Plan	A document which identifies the strategy for managing surface water run-off.
Ecological Management Plan	A document detailing the onshore ecological surveys to be undertaken prior to and during construction, and during the operational phase of Hornsea Project Three, where required. The plan will include relevant survey and ecological procedures.
Effect	Term used to express the consequence of an impact. The significance of an effect is determined by correlating the magnitude of the impact with the importance, or sensitivity, of the receptor or resource in accordance with defined significance criteria.
EIA Directive	European Union Directive 85/337/EEC, as amended by Directives 97/11/EC, 2003/35/EC and 2009/31/EC and then codified by Directive 2011/92/EU of 13 December 2011 (as amended in 2014 by Directive 2014/52/EU).
EIA Regulations	The Infrastructure Planning (Environmental Impact Assessment) Regulations 2009.
Emergency Response and Cooperation Plan (ERCoP)	A document detailing the offshore emergency co-operation plans for the construction, operation and decommissioning phases of Hornsea Project Three.

Term	Definition
Environmental Impact Assessment (EIA)	A statutory process by which certain planned projects must be assessed before a formal decision to proceed can be made. It involves the collection and consideration of environmental information, which fulfils the assessment requirements of the EIA Directive and EIA Regulations, including the publication of an Environmental Impact Assessment (EIA) Report.
EIA Road Maps	Documents setting out a programme of activities during the development of the EIA to provide greater certainty to all parties on the amount and range of evidence Ørsted should collect for certain topics.
European conservation site	A Special Area of Conservation (SAC) or candidate SAC, a Special Protection Area (SPA) or potential SPA, a site listed as a site of community importance or a Ramsar site.
Fisheries Co-existence Plan	A document describing the approach to liaison and consultation with the fishing industry throughout the lifetime of Hornsea Three (i.e. during the construction, operation and maintenance, and decommissioning phases).
Flood Risk Assessment (FRA)	An evaluation of the baseline onshore flood risk and effect as a result of Hornsea Project Three. The FRA will set out flood risk mitigation measures, as may be required.
Former Hornsea Zone	The Hornsea Zone was one of nine offshore wind generation zones around the UK coast identified by The Crown Estate (TCE) during its third round of offshore wind licensing. In March 2016, the Hornsea Zone Development Agreement was terminated and project specific agreements, Agreement for Leases (Afls), were agreed with The Crown Estate for Hornsea Project One, Hornsea Project Two, Hornsea Project Three and Hornsea Project Four. The Hornsea Zone has therefore been dissolved and is referred to throughout the Hornsea Project Three Scoping Report as the former Hornsea Zone.
Habitats Regulations Assessment (HRA)	A process which helps determine likely significant effects and (where appropriate) assesses adverse impacts on the integrity of European conservation sites and Ramsar sites. The process consists of up to four stages of assessment: screening, appropriate assessment, assessment of alternative solutions and assessment of imperative reasons of over-riding public interest (IROPI).
High Voltage Alternating Current (HVAC)	High voltage alternating current is the bulk transmission of electricity by alternating current (AC), whereby the flow of electric charge periodically reverses direction.
High Voltage Direct Current (HVDC)	High voltage direct current is the bulk transmission of electricity by direct current (DC), whereby the flow of electric charge is in one direction.
Hornsea Three intertidal area	The area between (MHWS) and (MLWS) in which all of the export cables will be landed and is the transitional area between the offshore export cabling and the onshore export cabling.
Hornsea Three onshore cable corridor	The corridor in which the onshore export cables will be located.
Hornsea Three offshore cable corridor	The corridor in which the offshore export cables will be located.
Hornsea Three array area	The area in which the Hornsea Three turbines are located.
Hornsea Project Four offshore wind farm	The fourth offshore wind farm project within the former Hornsea Zone. Referred to as Hornsea Four throughout the Environmental Statement.
Hornsea Project One offshore wind farm	The first offshore wind farm project within the former Hornsea Zone. It has a maximum capacity of 1.2 gigawatts (GW) or 1,200 MW and includes all necessary offshore and onshore infrastructure required to connect to the existing National Grid substation located at North Killingholme, North Lincolnshire. Referred to as Project One throughout the Environmental Statement.

Term	Definition
Hornsea Project Three offshore wind farm	The third offshore wind farm project within the former Hornsea Zone. It includes offshore and onshore infrastructure to connect to the existing National Grid substation located at Norwich Main, Norfolk. Referred to as Hornsea Three throughout the Environmental Statement.
Hornsea Project Two offshore wind farm	The second offshore wind farm project within the former Hornsea Zone. It has a maximum capacity of 1.8 GW (1,800 MW) and includes offshore and onshore infrastructure to connect to the existing National Grid substation located at North Killingholme, North Lincolnshire. Referred to as Project Two throughout the Environmental Statement.
Impact	Change that is caused by an action; for example, land clearing (action) during construction which results in habitat loss (impact).
In Principal Monitoring Plan	A plan describing the objectives of the offshore monitoring proposals and the guiding principles for delivering the monitoring measures.
Inter-related effects	Multiple effects on the same receptor arising from Hornsea Project Three. These occur either where a series of the same effect acts on a receptor over time to produce a potential additive effect or where a number of separate effects, such as noise and habitat loss, affect a single receptor, for example marine mammals.
Landscape Management Plan	A document detailing the proposed onshore landscape planting and landscape enhancement measures.
Lead Local Flood Authority	Lead Local Flood Authorities have responsibility for developing a Local Flood Risk Management Strategy for their area identifying local sources of flooding. The local strategy produced must be consistent with the national strategy. It will set out the local organisations with responsibility for flood risk in the area, partnership arrangements to ensure co-ordination between these organisations, an assessment of the flood risk, and plans and actions for managing the risk.
Magnitude	A combination of the extent, duration, frequency and reversibility of an impact.
Marine Conservation Zone (MCZ)	Marine Conservation Zones (MCZs) are a new type of Marine Protected Area (MPA) brought in under the UK Marine and Coastal Access Act 2009. MCZs will form a key part of the UK MPA network.
Marine Mammal Mitigation Protocol (MMMP)	A document detailing the protocol to be implemented in the event that driven or part-driven pile foundations are proposed to be used. The protocol identifies the methods for detection, potential mitigation and monitoring/reporting protocols for marine mammals.
Marine Pollution Contingency Plan (MPCP)	A document addressing the risks, methods and procedures to deal with spills and collusion incidents during the construction, and operation and maintenance phase.
Marine Strategy Framework Directive (MSFD)	The Directive 2008/56/EC on establishing a framework for community action in the field of marine environmental policy (MSFD) outlines a transparent, legislative framework for an ecosystem-based approach to the management of human activities which supports the sustainable use of marine goods and services. The overarching goal of the Directive is to achieve 'Good Environmental Status' (GES) by 2020 across Europe's marine environment.
Mean High Water Neaps (MHWN)	The height of mean high water neaps is the average throughout the year (when the average maximum declination of the moon is 23.5°) of two successive high waters during those periods of 24 hours when the range of the tide is at its least.
Mean High Water Springs (MHWS)	The height of mean high water springs is the average throughout the year (when the average maximum declination of the moon is 23.5°) of two successive high waters during those periods of 24 hours when the range of the tide is at its greatest.
Mean Low Water Neaps (MLWN)	The height of the mean low water neaps is the average height obtained by the two successive low waters during the same period as mean high water neaps.

Term	Definition
Mean Low Water Spring (MLWS)	The height of the mean low water springs is the average height obtained by the two successive low waters during the same period as mean high water springs.
Measures adopted as part of the project	Enhancement, mitigation or monitoring commitment (which may include process or design measures) intended to avoid, reduce and where possible, remedy significant adverse impacts of a development.
Mineral Safeguarding Area	An area designated by a Mineral Planning Authority which covers known deposits of minerals which are desired to be kept safeguarded from unnecessary sterilisation by non-mineral development.
National Policy Statement (NPS)	A document setting out national policy against which proposals for NSIPs will be assessed and decided upon.
Nationally Significant Infrastructure Project (NSIP)	Large scale development including power generating stations which requires development consent under the Planning Act 2008. An offshore wind farm project with a capacity of more than 100 MW constitutes an NSIP.
Norwich Main National Grid Substation	The existing National Grid Norwich Main substation which Hornsea Project Three will ultimately connect to.
Offshore Decommissioning Programme	A document confirming the geographic scope/spatial extent of decommissioning activities, process for seeking approval for decommissioning, and standards/objectives for the decommissioning process. A Decommissioning Programme is to be referred to for all decommissioning activities seaward of MHWS.
Offshore Habitats Regulations	The Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007 (as amended), which applies to marine habitats extending beyond 12 nautical miles (NM).
Offshore HVAC booster station search area	The area in which the offshore HVAC booster stations, if required, will be located.
Onshore Decommissioning Plan	A document confirming the geographic scope/spatial extent of decommissioning activities, process for seeking approval for decommissioning, and standards/objectives for the decommissioning process. A Decommissioning Plan is to be referred to for all decommissioning activities landward of Mean High Water Springs (MHWS).
Onshore HVAC booster station area	The area in which the onshore HVAC booster station, if required, will be located.
Onshore HVDC converter/HVAC substation area	The area in which the onshore HVDC converter/HVAC substation will be located.
Planning Act 2008	The key legislation providing for national policy guidance to assist in the delivery of Nationally Significant Infrastructure Projects (NSIPs). The 2008 Act led to the development of National Policy Statements (NPSs) to guide the decision-making processes for NSIPs.
Planning Inspectorate (PINS)	The executive agency of the Department for Communities and Local Government responsible for operating the planning process for NSIPs.
Project Description	A summary of the engineering design elements of Hornsea Three.
Project Environmental Management and Monitoring Plan (PEMMP)	This plan provides environmental risk analysis covering the MSCP, waste management, chemical risk assessment, offshore maintenance plans, details of Archaeological Exclusion Zones (AEZ), seasonal and working restrictions, and protocol for the appointment of Fisheries and Environmental Liaison Officers.
Receptor	A component of the natural or man-made environment that is affected by an impact, including people.

Term	Definition
Scour Protection Management Plan (SPMP)	A document detailing the need, type, sources, quantity, location and installation methods for scour protection.
Sensitivity	The extent to which a receptor can accept a change, of a particular type and scale
Significance	The significance of an effect combines the evaluation of the magnitude of an impact and the sensitivity of the receptor.
Site Waste Management Plan	A plan setting out a framework for the management and mitigation of waste arising from Hornsea Project Three construction works, and protocols for the recording of waste arisings, waste minimisation measures and protocols that will be further developed and implemented by the construction teams.
Source Protection Zone	Source Protection Zones are defined by the Environment Agency (for England) for groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. Source Protection Zones show the level of risk of contamination from activities on or in the ground that have the potential to cause groundwater pollution in the area and affect water quality at an abstraction.
Special Area of Conservation (SAC)	A site designation specified in the Habitats Directive (Council Directive 92/43/EEC). Each site is designated for one or more of the habitats and species listed in the Directive. The Directive requires a management plan to be prepared and implemented for each SAC to ensure the favourable conservation status of the habitats or species for which it was designated. In combination with Special Protection Areas (SPAs), these sites contribute to the Natura 2000 Sites network.
Special Protection Area (SPA)	A site of European Community importance designated under the Birds Directive (Directive 2009/147/EC), classified for rare and vulnerable birds (as listed on Annex I of the Directive), and for regularly occurring migratory species. SPAs contribute to the Natura 2000 Sites network.
Suspended sediments	Particulates in suspension in the water column, often comprising fine material such as clays and silts.
Transboundary	Crossing into other European Economic Association (EEA) States.
Written Scheme of Investigation (WSI)	A plan detailing the protocol for any archaeological investigation to be carried out prior to the construction of Hornsea Project Three, including procedures for field survey and watching briefs, as may be required both onshore and offshore.

## Acronyms

Unit	Description
AA	Appropriate Assessment
AEZ	Archaeological Exclusion Zone
AfL	Agreement for Lease
ALO	Agricultural Liaison Officer
AONB	Area of Outstanding Natural Beauty
APFP	Application: Prescribed Forms and Procedure
BE, MP and FSE	Benthic Ecology, Marine Processes and Fish and Shellfish Ecology
BEIS	Business, Energy and Industrial Strategy
CA	The Cruising Association
CAA	Civil Aviation Authority
CAP	Community Access Point
CEA	Cumulative Effect Assessment
Cefas	Centre for Environment, Fisheries and Aquaculture Science
CfD	Contract for Difference
CLA	Country, Land and Business Association
CO	Conservation Objective
CoCP	Code of Construction Practice
CRM	Collision Risk Monitoring
CWS	County Wildlife Site
DCLG	Department for Communities and Local Government
DCO	Development Consent Order
DECC	Department for Energy and Climate Change
Defra	Department for Environment, Food and Rural Affairs
DML	Deemed Marine Licence
DMMP	Dust Mitigation and Management Plan
ECR	Export Cable Route

Unit	Description
EEA	European Economic Area
EEEGR	East of England Energy Group
EIA	Environmental Impact Assessment
EIFCA	Eastern Inshore Fisheries and Conservation Authority
EMF	Electromagnetic Fields
EMP	Ecological Management Plan
ERCoP	Emergency Response and Cooperation Plan
ERRV	Emergency Response and Rescue Vessels
ES	Environmental Statement
EWG	Expert Working Group
FAQ	Frequently Asked Question
FCLP	Fisheries Coexistence and Liaison Plan
FIR	Fisheries Industry Representative
FLO	Fisheries Liaison Office
FLOWW	Fishing Liaison with Offshore Wind and Wet Renewables Group
FRA	Flood Risk Assessment
GBS	Gravity Based Structure
GBF	Gravity Base Foundation
GCN	Great Crested Newts
HDD	Horizontal Directional Drill
HE	Highways England
HGV	Heavy Goods Vehicles
HMLR	Her Majesty's Land Registry
HRA	Habitats Regulations Assessment
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
IDB	Internal Drainage Board
IAQM	Institute of Air Quality Management
IFCA	Inshore Fisheries and Conservation Authorities

Unit	Description
IROPI	Imperative Reasons of Overriding Public Interest
JNCC	Joint Nature and Conservation Committee
LEP	Local Enterprise Partnership
LIQ	Land Interest Questionnaire
LLFA	Lead Local Flood Authority
LMP	Landscape Management Plan
LPA	Local Planning Authority
LSE	Likely Significant Effects
LVIA	Landscape and Visual Impact Assessment
MarESA	Marine Evidence based Sensitivity Assessment
MCA	Maritime and Coastguard Agency
MCZ	Marine Conservation Zone
MEEB	Measures of Equivalent Environmental Benefit
MHWS	Mean High Water Spring
MIEU	Major Infrastructure Environment Unit
MM	Marine Mammals
MMMP	Marine Mammal Mitigation Protocol
MMO	Marine Management Organisation
MOD	Ministry of Defence
NAAV	Norfolk Association of Agricultural Valuers
NE	Natural England
NETS	National Electricity Transmission System
NFFO	National Federation of Fishermen's Organisations
NFU	National Farmers Union
NIFA	Norfolk Independent Fishermen's Association
NNFA	North Norfolk Fishermen's Association
NMP	Noise Management Plan
NOAA	National Oceanic and Atmosphere
NPPF	National Planning Policy Framework
NPS	National Policy Statement

Unit	Description
NPS EN-1	Overarching National Policy Statement for Energy
NPS EN-3	National Policy Statement for Renewable Energy Infrastructure
NPS EN-5	National Policy Statement for Electricity Networks Infrastructure
NRA	Navigation Risk Assessment
NSBLPZ	Norwich Southern Bypass Landscape Protection Zone
NSIP	Nationally Significant Infrastructure Project
NWT	Norfolk Wildlife Trust
O&M	Operation and Maintenance
OFCOM	Office of Communications
OFTO	Offshore Transmission Owners
OS	Ordnance Survey
OWF	Offshore Wind Farm
PEIR	Preliminary Environmental Information Report
PHE	Public Health England
PINS	Planning Inspectorate
PRoW	Public Rights of Way
pSAC	Potential Special Area of Conservation
pSPA	proposed Special Protection Area
PTS	Permanent Threshold Shift
PTS	Permanent Threshold Shift
PVA	Population Viability Analysis
REWS	Radar Early Warning System
RIAA	Report to Inform Appropriate Assessment
rMCZ	Recommended Marine Conservation Zone
RSPB	Royal Society for the Protection of Birds
RWS	Rijkswaterstaat
RYA	Royal Yachting Association
SAC	Special Area of Conservation
SAR	Search and Rescue
SCI	Site of Community Importance

Unit	Description
SEL	Sound Exposure Level
SNCB	Statutory Nature Conservation Body
SNS	Southern North Sea
SoCC	Statement of Community Consultation
SoCG	Statement of Common Ground
SPL	Sound Pressure Level
SSC	Suspended Sediment Concentration
SSSI	Site of Special Scientific Interest
SuDS	Surface Water Drainage Strategy
SVIA	Seascape and Visual Impact Assessment
TCE	The Crown Estate
TH	Trinity House
TWT	The Wildlife Trust
UK	United Kingdom
UXO	Unexploded Ordnance
VER	Valued Ecological Receptor
VOR	Valued Ornithological Receptor
WCC	White-clayed crayfish
WDC	Whale and Dolphin Conservation
WDFEA	Wells and District Fishermen's Association
WFD	Water Framework Directive
WSI	Written Scheme of Investigation
ZDA	Zone Development Agreement
ZTV	Zone of Theoretical Visibility

## Units

Unit	Description
ft	Foot (distance)
GW	Gigawatt (power)
ha	Hectares (area)
km	Kilometres (distance)
MW	Megawatts (power)
m	Metre (distance)

## 1. Executive Summary

- 1.1.1.1 This Consultation Report accompanies an application for a Development Consent Order (DCO) pursuant to Section 37 of the Planning Act 2008 (hereafter referred to as the 2008 Act). The application is made by Orsted Power (UK) Ltd., on behalf of Orsted Hornsea Project Three (UK) Ltd (the Applicant) hereafter referred to as Ørsted, in respect of the Hornsea Project Three Offshore Wind Farm (hereafter referred to as Hornsea Three). If granted, the DCO would empower Ørsted to construct, operate and maintain, and decommission the elements of Hornsea Three that are within England or lie within English waters, i.e. the Hornsea Three array area, offshore and onshore substations, and the offshore and onshore export cable.
- 1.1.1.2 This Consultation Report has been prepared in accordance with sections 37(3)(c), 37(7), 42, 47(7), 48 and 49 of the 2008 Act and follows guidance provided by the Department for Communities and Local Government (DCLG, 2015): Guidance on the pre-application process, the Infrastructure Planning (Application: Prescribed Forms and Procedure) Regulations 2009 as amended (the APFP Regulation) and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009. The Consultation Report demonstrates how Ørsted has complied with all relevant legislation and guidance and provides further details regarding non-statutory consultation undertaken for Hornsea Three.
- 1.1.1.3 Under the 2008 Act, Ørsted is required to carry out pre-application consultation on Hornsea Three prior to submitting a DCO application. Pre-application consultation for Hornsea Three has been ongoing since March 2016 and throughout the development of Hornsea Three. The consultation has included:
- Consultation with prescribed bodies<sup>1</sup>, host and neighbouring authorities and any landowners affected by Hornsea Three (under section 42 of the 2008 Act);
  - Consultation with the local community in the vicinity of the proposed Project (under section 47 of the 2008 Act); and
  - Consultation with the public (under section 48 of the 2008 Act).
- 1.1.1.4 Further information on the consultation requirements under sections 42, 47 and 48 of the 2008 Act is provided in sections 7 and 8 of this Consultation Report.
- 1.1.1.5 Consultation on Hornsea Three was undertaken across two broad phases.

### Phase 1

Phase 1 Consultation included consultation on the Hornsea Three Scoping Report as part of the Environmental Impact Assessment (EIA), Habitats Regulations Assessment (HRA) Screening Report and two rounds of community consultation under section 47 of the 2008 Act. Further information on the consultation requirements for the EIA and HRA are provided in chapter 3.3.1.2 of this Consultation Report. The consultations activities undertaken during Phase 1 are detailed in section 7 of this Consultation Report.

### Phase 2

Phase 2 Consultation included one round of statutory consultation on the Preliminary Environmental Information (PEI), which ran in parallel to consultation under sections 47 and 48 of 2008 Act, a further round of statutory consultation under section 42, which ran alongside consultation under section 47 and 48 of the 2008 Act and a third round of focussed statutory consultation under section 42 of the 2008 Act only. The consultations activities undertaken during Phase 2 are detailed in section 8 of this Consultation Report.

- 1.1.1.6 A summary of the key issues identified in relation to Hornsea Three as a result of the statutory consultation and how these responses were addressed by Ørsted in the Hornsea Three application is presented in section 0 of this Consultation Report.
- 1.1.1.7 Ørsted has also undertaken extensive non-statutory consultation to inform the EIA and site selection process for Hornsea Three (see section 6 of this Consultation Report). The information gathered has been used to identify any key issues or constraints arising through the development of Hornsea Three.

<sup>1</sup> This is based on the list provided by the Planning Inspectorate (PINS) in accordance with Regulation 9(1)(b).

## 2. Introduction

### 2.1 Summary

2.1.1.1 This section of the Consultation Report sets out the policy and legislative context and approach to consultation. It describes the Applicant (Ørsted) and the proposed development (Hornsea Three).

### 2.2 Structure of this Consultation Report

2.2.1.1 The structure of this Consultation Report is outlined below and takes into account the most recent guidelines published by the Planning Inspectorate (PINS) (2012) in Advice Note 14: Compiling the consultation report.

- Section 1: Executive Summary;
- Section 2: Introduction;
- Section 3: Explanatory Text;
- Section 4: Consultation under the EIA and Habitat Regulations, including an overview of relevant policy and legislation, approach to Environmental Impact Assessment, Habitats Regulations Assessment and transboundary consultation;
- Section 5: Statement of Community Consultation (SoCC); including an outline of the statutory requirements, rationale and consultation on the draft SoCC, and publication and compliance with the SoCC;
- Section 6: Non-Statutory Consultation, including an overview of non-statutory consultation activities undertaken during the pre-application period;
- Section 7: Phase 1 Consultation, detailing the consultation activities undertaken during Phase 1, including two rounds of consultation under section 47 of the 2008 Act;
- Section 8: Phase 2 Consultation; detailing the consultation activities undertaken during Phase 2, including consultation on the PEIR under sections 42, 47 and 48 of the 2008 Act and two further rounds statutory consultation undertaken as a result of feedback on the PEIR;
- Section 9: Phase 2: Summary of responses; provides a summary of the key issues raised during the Phase 2 Consultation and how Ørsted has had regard to these;
- Section 10: Statements of Common Ground; and
- Section 11: Conclusion.

### 2.3 Legislative Context

2.3.1.1 Part 5 of the 2008 Act sets out the requirements for an application for development consent.

2.3.1.2 Section 37(3)(c) requires that a consultation report accompanies the application and, in accordance with section 37(7), the consultation report should provide details of:

- i. What has been done in compliance with sections 42, 47 and 48 of the 2008 Act in relation to the proposed application;
- ii. Any relevant responses to the separate strands of consultation; and
- iii. The account taken of any relevant responses in developing the proposed application.

2.3.1.3 In this instance 'relevant responses' means a response from a person consulted under section 42 that is received by Ørsted either: (i) before the deadline imposed by Ørsted under section 45 in that person's case; (ii), a response to consultation under section 47(7) that is received by the applicant before any applicable deadline imposed in accordance with the statement prepared under section 47, or (iii) a response to publicity under section 48 that is received by the applicant before the deadline imposed in accordance with section 48(2) in relation to that publicity.

2.3.1.4 In preparing this Consultation Report consideration has also been given to the following guidance:

- Advice note three: EIA consultation and notification (PINS, 2015c);
- Advice note six: Preparation and submission of application documents (PINS, 2016);
- Advice note fourteen: Compiling the consultation report (PINS, 2012); and
- Planning Act 2008: Guidance of the pre-application process (DCLG, 2015).

### 2.4 Ørsted

2.4.1.1 Ørsted A/S (formerly DONG Energy A/S<sup>2</sup>) (owner of Orsted Power (UK) Ltd. and Orsted Hornsea Project Three (UK) Ltd.) specialises in procuring, producing, distributing and trading energy and related products in Northern Europe. Ørsted A/S is the world leader in the development, construction and operation of offshore wind farms, with more than 25 years' experience and a strong track record of delivering successful projects, with approximately 4.4 GW of operational offshore wind farm worldwide, and a further 4.5 GW under construction in the lead up to 2022.

2.4.1.2 The Danish state-owned energy company Dansk Naturgas A/S was founded in 1972 to manage Denmark's growing oil and gas resources industry in the Danish territories of the North Sea. The company was eventually renamed as Danish Oil and Natural Gas (DONG). DONG established itself in the electricity markets in the early 2000s by investing in Danish electricity companies. DONG Energy A/S, was established in 2006 by the merging of six Danish Energy Companies (DONG, Elsam, Energi E2, Nesa, Københavns Energi and Frederiksberg Forsyning). Through these acquisitions, Ørsted A/S (formerly DONG Energy A/S) has been involved with offshore wind since the very start of the offshore wind energy industry.

<sup>2</sup> Further details regarding the change in company name are provided in section 5.10. The Applicant is referred to as Ørsted throughout, except where references are made to documents published prior to the name change coming into effect.

2.4.1.3 Ørsted A/S, announced its intention to change its company name on 2 October 2017 and this change came into effect publicly on 6 November 2017. This change occurred during the pre-application consultation period for Hornsea Three and therefore measures were taken to ensure consultees were aware of the change and any implications for Hornsea Three. The measures taken to notify consultees are detailed in section 5.10 of this Consultation Report. Hereafter in this Consultation Report all references to Ørsted will refer to the same entity under its previous name.

2.4.1.4 Ørsted A/S is involved in consenting, construction and operation of a number of Round 1, Round 2, Round 2.5 (referred to as Round 1 and Round 2 extension projects) and Round 3 offshore wind projects in the UK, specifically:

- Barrow – operational (90 MW);
- Burbo Bank – operational (90 MW);
- Burbo Bank Extension – operational (258 MW);
- Gunfleet Sands I, II and III (Demonstration) – operational (totalling 184 MW);
- Hornsea Project One (hereafter referred to as Project One) – in construction (1,200 MW);
- Hornsea Project Two (hereafter referred to as Project Two) – in construction (1,800 MW);
- Hornsea Project Four (hereafter referred to as Project Four) – pre-development project, not yet currently scoped or screening opinion sought;
- Lincs – operational (270 MW);
- London Array – operational (630 MW);
- Race Bank – in construction (580 MW);
- Walney I and II – operational (totalling 367 MW);
- Walney Extension – in construction (660 MW);
- West of Duddon Sands – operational (389 MW); and
- Westermost Rough – operational (210 MW).

## 2.5 Project overview

### 2.5.1 Hornsea Project Three

2.5.1.1 Hornsea Three will have a total capacity of over 100 MW and is therefore classified as a Nationally Significant Infrastructure Project<sup>3</sup>.

2.5.1.2 The Hornsea Three array area (i.e. the area in which the turbines are located) is approximately 696 km<sup>2</sup>, and is located approximately 121 km northeast off the Norfolk coast and 160 km east of the Yorkshire coast. The Hornsea Three array area lies to the east of Hornsea Project One and Hornsea Project Two array areas (Figure 2.1).

2.5.1.3 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.

2.5.1.4 From the Norfolk coast, underground onshore cables will connect the offshore wind farm to an onshore High Voltage Direct Current (HVDC) converter/High Voltage Alternating Current (HVAC) substation, which in turn, connect to an existing National Grid substation. Hornsea Three will connect into Norwich Main National Grid substation, located to the south of Norwich. Depending on the mode of transmission, Hornsea Three could require a HVAC booster station onshore and/or offshore positioned along the Hornsea Three onshore cable corridor to mitigate transmission losses across the entire cable route. The Hornsea Three onshore cable corridor is 55 km in length at its fullest extent (Figure 2.1).

### 2.5.2 The Hornsea Zone

2.5.2.1 The former Hornsea Zone was one of nine offshore wind generation zones around the UK coast identified by The Crown Estate (TCE) during its third round of offshore wind energy licensing. The former Hornsea Zone was located in the southern North Sea, approximately 31 km east of the Yorkshire coast and 1 km from the median line between UK and Dutch waters.

2.5.2.2 As part of a competitive tender process, SMart Wind Ltd. (a 50/50 joint venture between International Mainstream Renewable Power (Offshore) Limited and Siemens Project Ventures GmbH; hereafter referred to as SMart Wind) was awarded the rights to the development of the former Hornsea Zone by entering into a Zone Development Agreement (ZDA) with TCE in 2009. The subsequent development agreement between SMart Wind and TCE established a target capacity of 4,000 MW of generating capacity within the former Hornsea Zone, which was to be met through the development of several offshore wind farms.

2.5.2.3 The first project to be proposed within the former Hornsea Zone was Hornsea Project One. Hornsea Project One comprises up to three offshore wind farms with a maximum generating capacity of 1,200 MW. The Secretary of State granted Development Consent for Hornsea Project One on 10 December 2014.

2.5.2.4 The second project to be proposed within the former Hornsea Zone was Hornsea Project Two. Hornsea Project Two comprises up to two offshore wind farms with a maximum generating capacity of 1,800 MW. The Secretary of State granted Development Consent for Hornsea Project Two on 16 August 2016.

<sup>3</sup> This figure assumes a load factor of 42% and a household consumption of 4.1 MWh per year (DECC, July 2015).

2.5.2.5 Ørsted Wind Power A/S acquired the development rights to Hornsea Project One in February 2015 and, in August 2015, Orsted Power (UK) Ltd. acquired SMart Wind and the former Hornsea Zone, together with the development rights for Hornsea Project Two, Hornsea Three and Hornsea Project Four (hereafter referred to as Hornsea Four). Subsequently in March 2016, the Hornsea Zone Development Agreement was terminated and project specific agreements, called Agreement for Leases (Afls), were agreed with TCE for Hornsea Project One, Hornsea Project Two, Hornsea Three and Hornsea Four. The Hornsea Zone has therefore been dissolved and is referred to throughout the Hornsea Three DCO application as the former Hornsea Zone.

## 2.6 Hornsea Project One and Hornsea Project Two consultation

2.6.1.1 The Hornsea Three array area lies to the east of Hornsea Project One and Hornsea Project Two offshore wind farms (Figure 2.1). The proposed Hornsea Three array area has similarities, both in terms of the nature of the development and its proximity to Hornsea Project One and Hornsea Project Two array areas. As such, where matters were raised during consultation on Hornsea Project One and Hornsea Project Two, and are relevant to the Hornsea Three offshore EIA, they were considered within volume 4, annex 1.1. (document reference number A6.4.1.1) of the Hornsea Three Environmental Statement. This document contains a summary of the matters raised according to each offshore Environmental Statement topic, together with how they were considered in Hornsea Three.

2.6.1.2 Hornsea Three has a different onshore cable corridor, as well as grid connection, to Hornsea Project One and Hornsea Project Two. As such, onshore matters raised during Hornsea Project One and Hornsea Project Two consultation are not necessarily applicable to Hornsea Three and as such, onshore matters have not been considered as part of the Hornsea Three application. Ørsted however has a considerable amount of experience developing offshore wind farms and, where applicable, lessons learnt (onshore and offshore) have been applied in the development of Hornsea Three.

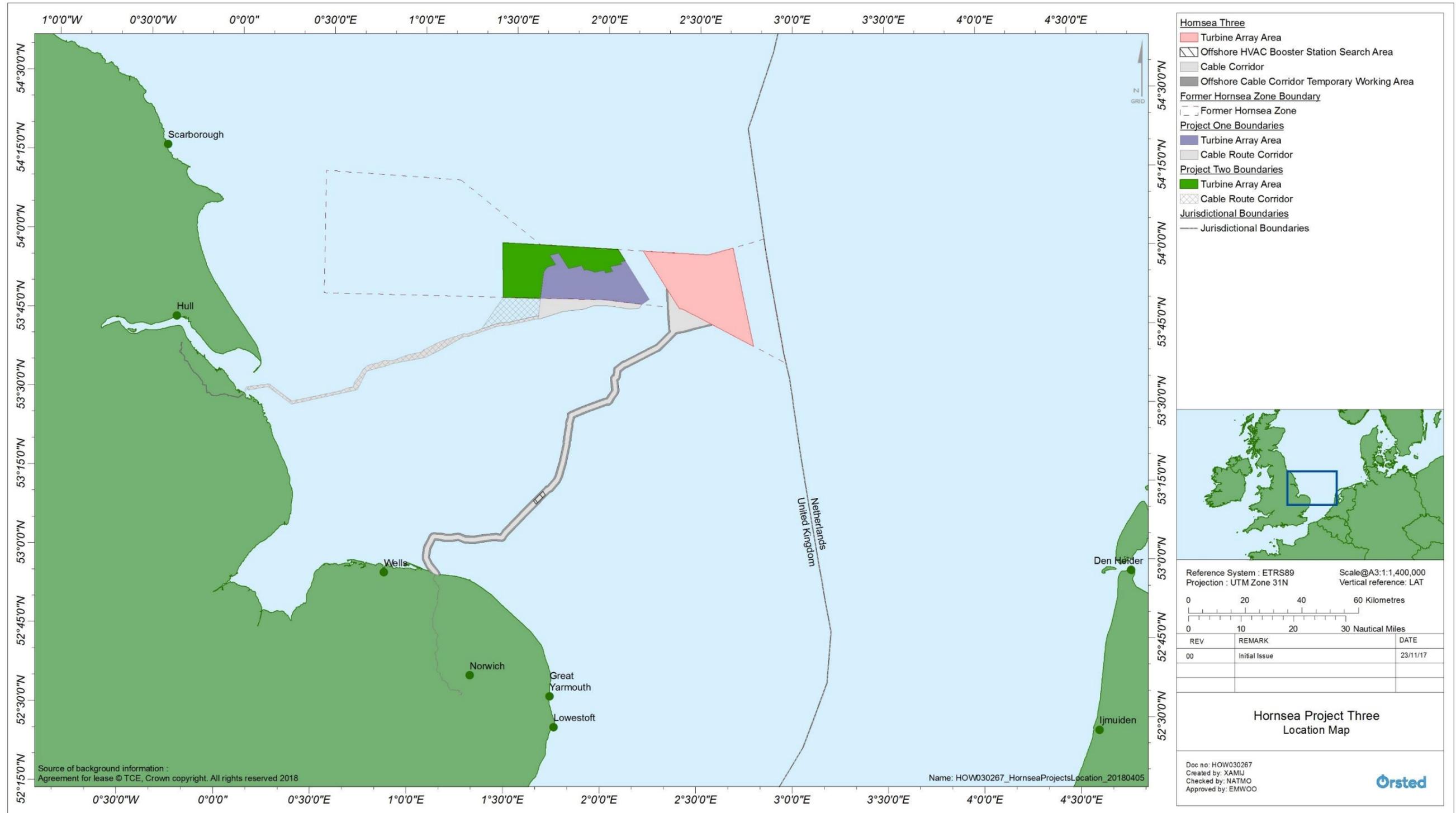


Figure 2.1: Map showing the location of the Hornsea Three array area off the Norfolk Coast in relation to the other former Hornsea Zone projects.

## 3. Hornsea Three consultation

### 3.1 Summary

3.1.1.1 This section provides a high-level summary of the consultation activities undertaken for Hornsea Three and the key changes that were made to Hornsea Three based on stakeholder feedback. It describes the iterative process that was undertaken, particularly in relation to identification of the export cable route and explains how this led to further consultation being undertaken above and beyond what was initially proposed. Finally, it explains the structure of this Consultation Report and timeline of activities.

### 3.2 Consultation Process

3.2.1.1 Ørsted adopted a phased approach to consultation on Hornsea Three. Consultation with stakeholders commenced early in the development process, while plans were still flexible enough to be influenced by feedback. Ørsted published the Statement of Community Consultation (SoCC) for Hornsea Three in September 2016. In the SoCC, Ørsted committed to holding two rounds of community consultation (one during each phase), to align with publication of the Scoping Report (Phase 1) and publication and consultation on the Preliminary Environmental Information Report (PEIR) (Phase 2), which form part of the Environmental Impact Assessment.

3.2.1.2 In response to feedback from stakeholders on the early proposal and consultation approach at Phase 1.A, Ørsted introduced an additional round of consultation under Phase 1, which took place in March 2017 (referred to as 'Phase 1.B'). During Phase 1.B consultation, Ørsted presented and sought feedback on a refined export cable corridor search area both onshore and offshore, three locations that were being considered to site the onshore High Voltage Alternating Current (HVAC) booster station and the results of the constraints mapping exercise that had been undertaken to identify least constrained areas for locating the onshore HVDC converter/HVAC substation near to Norwich Main.

3.2.1.3 In response to feedback gathered at Phase 1.B, Ørsted made a number of refinements prior to publishing the PEIR in July 2017, most notably refinement of the onshore HVAC booster station options, largely driven by local feedback. This enabled more focussed consultation to take place during Phase 2, where feedback was sought on the more detailed design and results of the initial environmental assessments in the form of the PEIR.

3.2.1.4 Further discussions between Phase 1.B and the start of Phase 2 also led to the identification of several new areas onshore; including some potential alternative routes near to Kelling Heath SSSI, Salle and Little Melton and a fourth location to be considered for the Main Construction Compound. These additional areas were presented on the Phase 2 Statutory Consultation plans that accompanied the PEIR (this phase is subsequently referred to as 'Phase 2.A'), so that Ørsted could seek feedback those areas at that stage. It was however noted that those areas had not been assessed at that point.

3.2.1.5 In the PEIR (Phase 2.A), Ørsted consulted on a 200 m wide onshore export cable corridor search area, within which the final 80 m wide corridor would be located and a 1.5 km wide offshore cable corridor. In response to feedback received on the PEIR (Phase 2.A) and further design refinement, Ørsted reviewed the Hornsea Three proposal and a number of alternative routes were identified, which extended beyond the previous consultation boundary. This included two potential offshore alternative routes to minimise the potential impact on the Cromer Shoal Chalk Beds MCZ and North Norfolk Sandbanks and Saturn Reef SAC and several new areas onshore that extended beyond the previous boundary; including potential onshore cable corridor re-routes, potential access routes and visual screening being considered.

3.2.1.6 Ørsted carried out further Statutory Consultation (Phase 2.B) on these new areas in November and December 2017, and in considering feedback to this consultation, a further six minor amendments were proposed to the onshore cable corridor, this included cable realignment within the same land ownership and even field in some instances and additional access points. A third and final round of focussed Statutory Consultation (Phase 2.C) was undertaken in February and March 2018 on those proposed changes, and the route was subsequently finalised for the DCO application.

3.2.1.7 In between Phase 2.B and Phase 2.C, Ørsted provided an update to stakeholders in terms of changes that had been made to the proposal as a result of stakeholder feedback from the PEIR (Phase 2.A). This included; a reduction in the maximum number of phases that Hornsea Three could be built out in, from three to two; identification of over seventy HDD points along route to minimise the impact on ecologically sensitive sites and the load road network; identification of access points following more detailed route design; developments in the compound strategy, including selection of the main construction compound and refinements to the onshore HVAC booster station, onshore HVDC converter/HVAC substation including proposed landscaping.

3.2.1.8 Through holding multiple rounds of consultation, Ørsted was able to encourage greater participation from all stakeholders and use their feedback to optimise the final design for Hornsea Three. Furthermore, by undertaking consultation in this manner, consultees have been able to observe how their feedback has influenced the proposal as the final design has emerged.

### 3.3 Structure of this Consultation Report

3.3.1.1 This Consultation Report describes the consultation process that Ørsted has followed both in terms of the non-statutory 'informal' consultation and the statutory 'formal' consultation and publicity stages as required under sections 42, 47 and 48 of the 2008 Act (a diagrammatical representation of this is depicted in Figure 3.1). It outlines the feedback received and explains how the comments received have been taken into account by Ørsted as required under section 49 of the 2008 Act. Further consultation subsequent to the completion of the formal pre-application consultation but prior to the application being submitted is also described. A summary of the key issues raised by EIA topic as part of the statutory consultation under Phase 2 Consultation is provided in section 0 of this Consultation Report. All responses received from consultees under sections 42, 47 and 48 of the 2008 Act are captured in tabulated format within the annexes that accompany this Consultation Report.

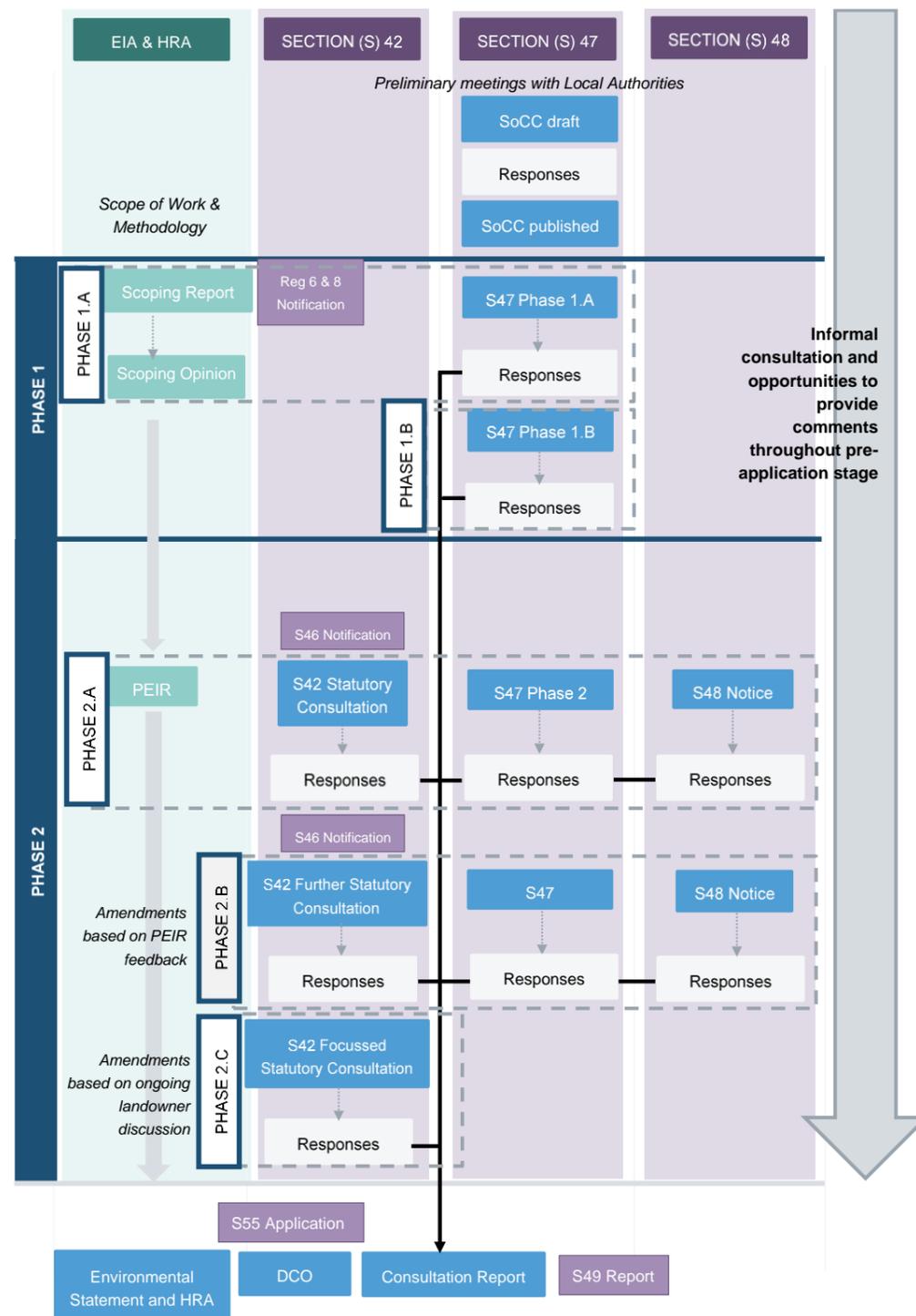


Figure 3.1: Diagram outlining the Hornsea Three pre-application consultation programme<sup>4</sup>.

3.3.1.2 In accordance with guidance from PINS (2012) in Advice Note 14: Compiling the consultation report, an overview of the key stages in the consultation process undertaken for Hornsea Three since March 2016 until submission of the application in May 2018<sup>5</sup> has been provided within Table 3.1.

Table 3.1: Timeline of pre-application consultation activities.

Date	Consultation activity	Section/Annex
March 2016 - Ongoing	Ørsted carried out non-statutory consultation with prescribed and non-prescribed bodies throughout the pre-application consultation period.	Further details are provided in section 6 of this Consultation Report.
March to July 2016	Ørsted held preliminary meetings with the local authorities to introduce Hornsea Three and the proposed approach to consultation under section 47 of the 2008 Act.	Further details on the consultation carried out on the SoCC is provided in section 5 of this Consultation Report.
September 2016	The final Statement of Community Consultation (SoCC) was published on 30 September and advertised in the prescribed manner. This marked the commencement of Phase 1 Consultation.	See Annex 10 to this Consultation Report (document reference number A5.1.10).
October 2016	Ørsted notified PINS on 26 October 2016, of its intention to provide an Environmental Statement in respect of Hornsea Three pursuant to Regulation 6(1)(b) and requested the Secretary of State adopt a Scoping Opinion in respect of Hornsea Three, pursuant to Regulation 8(1)(b). A Scoping Report was prepared and published on the Hornsea Three website in support for the request for a Scoping Opinion from the Secretary of State.	Further details are provided in section 4.3 of this Consultation Report and in Annex 4 to this Consultation Report (document reference number A5.1.4).
October / November 2016	Ørsted undertook Phase 1 Consultation (hereafter referred to as "Phase 1.A") with local communities under section 47 of the 2008 Act in accordance with the SoCC.	Further details are provided in section 7.2 of this Consultation Report and in Annex 11 and 13 to this Consultation Report (document reference numbers A5.1.11 and A5.1.13 respectively).
December 2016	Ørsted received the Scoping Opinion under Regulation 8 and list of prescribed consultation bodies notified by the Secretary of State under Regulation 9(1)(b) from PINS on 6 December 2016.	Further information is provided in section 4.3.2 of this Consultation Report.
December / January 2017	Ørsted consulted on the HRA Screening Report (DONG Energy, 2016c).	Further information is provided in section 4.5 of this Consultation Report.

<sup>4</sup> Those elements marked as "Section" or "S" refer to sections and obligations as set out in the Act 2008. Where activities relating to different consultation streams ran in parallel with one another, these have grouped under the relevant consultation phase.

<sup>5</sup> Consultation undertaken prior to this related to consultation across the former Hornsea Zone.

Date	Consultation activity	Section/Annex
February / March 2017	Ørsted undertook Phase 1.B Consultation with local communities under section 47 of the 2008 Act. This was in addition to consultation outlined in the SoCC.	Further details are provided in section 7.3 of this Consultation Report and Annex 12 and 13 to this Consultation Report (document reference numbers A5.1.12 and A5.1.13 respectively).
July 2017	Ørsted published its Preliminary Environmental Information Report (PEIR) as part of the EIA. Ørsted notified PINS on 26 July 2017, in advance of commencing consultation under section 42 of the 2008 Act, of its intention to submit an application for a DCO for Hornsea Three and provided PINS with the consultation documents. This marked the commencement of Phase 2 Consultation, which consisted of three rounds of statutory consultation.	Further details are provided in section 8 of this Consultation Report and Annex 8 to this Consultation Report (document reference number A5.1.8).
July to September 2017	Ørsted carried out statutory consultation on Hornsea Three under sections 42, 47 and 48 of the 2008 Act, informed by the PEIR, hereafter referred to as "Statutory Consultation" or "Phase 2.A". The Statutory Consultation (Phase 2.A) closed on 20 September 2017.	Further details are provided in section 8.3 of this Consultation Report and Annex 6, 9 and 14 to this Consultation Report (document reference numbers A5.1.6, A5.1.9 and A5.1.14 respectively).
September 2017 to March 2018	Ørsted met with prescribed and non-prescribed bodies to discuss their feedback to the statutory consultation and to provide an update on Hornsea Three.	Further information is provided in sections 6 and 0 of this Consultation Report.
November to December 2017	Ørsted carried out targeted statutory consultation under sections 42, 47 and 48 of the 2008 Act (hereafter referred to as "Further Statutory Consultation" or "Phase 2.B") on locations identified beyond the previous statutory consultation boundary (Figure 8.3).	Further details are provided in section 8.4 of this Consultation Report and Annex 6, 9 and 14 to this Consultation Report (document reference numbers A5.1.6, A5.1.9 and A5.1.14 respectively).
February to March 2018	Ørsted carried out focussed statutory consultation under section 42 of the 2008 Act (hereafter referred to as "Focussed Statutory Consultation" or "Phase 2.C") on some minor amendments to the onshore cable route (Figure 8.4). This was a round of targeted consultation following changes resulting from stakeholder feedback, which extended outside the area already consulted on under section 42.	Further details are provided in section 8.5 of this Consultation Report and Annex 6 to this Consultation Report (document reference number A5.1.6).

## 4. Consultation under the EIA and Habitat Regulations

### 4.1 Summary

4.1.1.1 This section provides an overview of the statutory consultation undertaken for Hornsea Three in accordance with the EIA and HRA Regulations as described in the following sections. It sets out the legislative requirements, the approach adopted by Ørsted, including wider non-statutory consultation (through the Evidence Plan process, see section 4.6.1) to agree the EIA methodology and details how Ørsted has complied with the relevant legislation. Ørsted's approach to transboundary consultation is also outlined.

### 4.2 Policy and Legislation

4.2.1.1 The EIA Directive requires that an EIA be undertaken in support of an application for a DCO for certain types of project. Offshore wind farms are listed in Annex II of the EIA directive as "*installations for the harnessing of wind power for energy production (wind farms)*".

4.2.1.2 The purpose of the EIA Directive is to ensure that when an authority giving consent for a particular project makes its decision, it does so in the knowledge of any likely significant effects on the environment. The EIA Directive and EIA Regulations set out a procedure that must be followed for certain types of project before they can be given a DCO. An EIA provides for the systematic assessment of a project's likely significant environmental effects for consideration by both the public and the relevant competent authority before a planning consent decision is made.

4.2.1.3 As the Scoping Opinion was requested prior to 16 May 2017 (the date of the commencement of the 2017 EIA Regulations), PINS confirmed that the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (the 2009 EIA Regulations) are therefore considered to be the applicable EIA Regulations.

4.2.1.4 Regulation 37 of the 2017 Regulations provides transitional arrangements for the continued applicability of the 2009 EIA Regulations. The transitional provisions apply to any application for an order granting development consent or subsequent consent where an Applicant has requested the Secretary of State or the relevant authority to adopt a Scoping Opinion (as defined in the 2009 Regulations) before the commencement of the 2017 Regulations in respect of the development to which the application relates. Although Ørsted sought a Scoping Opinion prior to the relevant date under the 2017 EIA Regulations, Hornsea Three has adopted, where possible, the new 2017 Regulations to ensure a robust approach.

- 4.2.1.5 According to the 2009 and 2017 EIA Regulations, the EIA is a process of:
- i. The preparation of an Environmental Statement or updated Environmental Statement, as appropriate, by the Applicant;
  - ii. The carrying out of consultation, publication and notification as required under these regulations or as necessary, any other enactment; and
  - iii. The steps that are required to be undertaken by the Secretary of State (i.e. consideration of whether a DCO should be granted) or by the relevant authority (i.e. decision maker on subsequent applications), as appropriate.

### 4.3 Screening for EIA development and obtaining a Scoping Opinion

#### 4.3.1 Scoping Report

4.3.1.1 In accordance with Regulation 8 of the 2009 EIA Regulations, a Scoping Report (Ørsted, 2016) was prepared by Ørsted in support of a request for a Scoping Opinion from the Secretary of State (Annex 4 to this Consultation Report, document reference number A5.1.4). To comply with Regulation 8 of the 2009 EIA Regulations, the Scoping Report provided:

- Plans sufficient to identify the area required for the construction, operation and maintenance, and decommissioning of Hornsea Three;
- A brief description of the nature and purpose of the proposed development, and of its possible effect on the environment; and
- Other information on the characteristics of the proposed development and the environmental features likely to be affected by the proposed development, sufficient to define those potential characteristics, impacts and features to be considered further in the EIA and those which need not be considered further.

4.3.1.2 On 26 October 2016, Ørsted requested the Secretary of State to adopt this Scoping Opinion in respect of Hornsea Three pursuant to Regulation 6 of the 2009 EIA Regulations (Annex 4 to this Consultation Report, document reference number A5.1.4).

#### 4.3.2 Scoping Opinion

4.3.2.1 On receipt of the Scoping Report, PINS on behalf of the Secretary of State for Business, Energy and Industrial Strategy (BEIS) consulted on the Hornsea Three Scoping Report and issued a Scoping Opinion on 6 December 2016 (PINS, 2016).

4.3.2.2 The Scoping Opinion concluded that the Secretary of State was satisfied that the topic areas identified in the Scoping Report encompassed those matters identified in Schedule 4, Part 1, paragraph 19 of the Infrastructure Planning (EIA) Regulations 2009 (as amended).

4.3.2.3 In quarter 1 of 2017, Ørsted met with numerous stakeholders informally to discuss their feedback on the Hornsea Three Scoping Report as detailed in the Scoping Opinion. Comments received through the scoping process were considered by Ørsted and used to inform the selection of survey methodologies for the EIA. This included consideration through the Evidence Plan and Expert Working Groups (EWGs), Road Maps and the Marine Conservation Zone (MCZ) Working Group. This is further detailed in section 6.2 of this Consultation Report.

4.3.2.4 Ørsted has had regard to responses captured in the Scoping Opinion and key consultation responses are included in the consultation tables in the Environmental Statement topic chapters (document reference number A6).

### 4.4 Meeting the requirements of the EIA Regulations

4.4.1.1 The purpose of the EIA Directive is to ensure that when an authority giving consent for a particular project makes its decision, it does so in the knowledge of any likely significant effects on the environment. The EIA Directive and EIA Regulations set out a procedure that must be followed for certain types of project before they can be given a DCO. An EIA provides for the systematic assessment of a project's likely significant environmental effects for consideration by both the public and the relevant competent authority before a planning consent decision is made.

#### 4.4.2 National Policy Statements

4.4.2.1 National Policy Statements (NPSs) were designated under the 2008 Act. They describe the national case and establish the need for certain types of infrastructure development including energy, as well as identifying potential key issues that should be considered by the examining body and decision maker when considering an application for a DCO.

4.4.2.2 Generic advice on an EIA as relevant to Hornsea Three is provided by Overarching National Policy Statement for Energy (EN-1; hereafter referred to as NPS EN-1) (DECC, 2011a), National Policy Statement for Renewable Energy Infrastructure (EN-3; hereafter referred to as NPS EN-3) (DECC, 2011b) and National Policy Statement for Electricity Networks Infrastructure (EN-5; hereafter referred to as NPS EN-5) (DECC, 2011c). These NPSs provide the primary basis for decisions by the Secretary of State on applications for nationally significant renewable energy infrastructure (defined in section 1.8 of NPS EN-3; DECC, 2011b).

4.4.2.3 The NPSs relevant to Hornsea Three are summarised in Table 4.1. Ørsted has complied with these in developing Hornsea Three and where relevant, evidence of compliance with the NPSs has been provided in the Environmental Statement (document reference number A6).

Table 4.1: NPSs relevant for Hornsea Three.

NPS	Description
Overarching National Policy Statement on Energy (EN-1; hereafter referred to as NPS EN-1) (DECC, 2011c).	NPS EN-1 (DECC, 2011c) sets out the Government's policy for the delivery of major energy infrastructure and supports the requirements of the Renewable Energy Directive. The policy states that new projects are urgently required in order to ensure that the UK's renewable energy target of sourcing 15% of its energy from renewable sources is met by 2020 (NPS EN-1, paragraph 3.4.1). NPS EN-1 states that the Secretary of State should consider all applications for a DCO for energy infrastructure covered by NPS EN-1, on the basis that the Government has demonstrated there is a need for those types of projects (NPS EN-1, paragraph 3.1.3).
National Policy Statement for Renewable Energy Infrastructure (EN-3; hereafter referred to as NPS EN-3) (DECC, 2011d).	NPS EN-3 (DECC, 2011d) recognises the need for 25 GW of new offshore wind-derived generating capacity in the UK Renewable Energy Zone (REZ) and the territorial waters of England and Wales, in addition to the 8 GW already planned (NPS EN-3, paragraph 2.6.15). It also refers to the Offshore Energy Strategic Environmental Assessment (SEA), which concludes that there are no overriding environmental considerations preventing the plans for 33 GW of offshore wind capacity, if mitigation measures are implemented (NPS EN-3, paragraph 2.6.15). NPS EN-3 confirms the role of the Secretary of State in the offshore consenting process, including the power of the Secretary of State to grant Deemed Marine Licences as part of a project's DCO (NPS EN-3, paragraph 2.6.9). NPS EN-3 identifies certain environmental topic-specific policy considerations. Where appropriate, these are outlined within the relevant topic chapters of this Environmental Statement.
National Policy Statement for Electricity Networks Infrastructure (EN-5; hereafter referred to as NPS EN-5) (DECC, 2011e).	NPS EN-5 (DECC, 2011e) relates to applications for electricity networks infrastructure. NPS EN-3 sets out that the onshore element of a grid connection for an offshore wind farm, including electricity lines for transmission and substations, should be determined in accordance with NPS EN-5 (NPS EN-3, paragraph 2.6.41). NPS EN-5 identifies certain environmental topic specific policy considerations. Where appropriate, these are outlined within the relevant topic chapters of this Environmental Statement.

4.4.2.4 Evidence that Ørsted has complied with the 2009 EIA Regulations is provided in Annex 2 of this Consultation Report (document reference number A5.1.2) and summarised in Table 4.2.

Table 4.2: Summary of compliance with Infrastructure Planning (EIA) Regulations 2009.

Summary of legislation	Compliance
<b>Infrastructure Planning (Environmental Impact Assessment) Regulations 2009</b>	
<u>Regulation 6</u> (1) A person who proposes to make an application for an order granting development consent must, before carrying out consultation under section 42 (duty to consult) either - (a) request the Secretary of State to adopt a screening opinion in respect of the development to which the application relates; or (b) notify the Secretary of State in writing that the person proposes to provide an environmental statement in respect of that development.	Ørsted notified PINS on 26 October 2016, that they intended to provide an Environmental Statement in respect of Hornsea Three pursuant to Regulation 6(1)(b) and requested the Secretary of State adopt a Scoping Opinion in respect of Hornsea Three, pursuant to Regulation 8(1)(b).
(3) A request or notification under paragraph (1) must be accompanied by – (a) a plan sufficient to identify the land; (b) a brief description of the nature and purpose of the development and of its possible effects on the environment; and (c) such other information or representations as the person making the request may wish to provide or make.	A plan sufficient to identify the land was provided as an appendix to the Regulation 6 letter. A Scoping Report (DONG Energy, 2016a) was produced and issued to PINS, which provided a description of the nature and purpose of Hornsea Three and an explanation of the possible effects of the Hornsea Three identified at that stage.  It was noted that it was not possible at that stage to provide full details of permanent and temporary land take required for Hornsea Three and that the area presented in the Scoping Report would be refined down Hornsea Three progressed.
(6) The Secretary of State or the relevant authority must adopt a screening opinion or a subsequent screening opinion within 21 days beginning with the date of receipt of a request made pursuant to paragraph (1) or (2), or where the Secretary of State or, as the case may be, the relevant authority has notified the person making the request it requires additional information, within 21 days of receiving that information.	On 6 December 2016, PINS on behalf of the Secretary of State for BEIS, issued a Scoping Opinion to Ørsted in respect of Hornsea Three.
(7) Where the Secretary of State or the Examining authority adopts a screening opinion, or the Secretary of State makes a screening direction under regulation 5, the Secretary of State or the Examining authority, as the case may be, must – (a) issue with the opinion or direction a written statement giving clearly and precisely the full reasons for that conclusion; (b) send a copy of the opinion or direction and a copy of the written statement required by sub-paragraph (a) to the applicant; and (c) where the Examining authority adopts the opinion, send a copy of the opinion and a copy of the written statement to the Secretary of State.	On 6 December 2016, PINS on behalf of the Secretary of State for BEIS, issued a Scoping Opinion to Ørsted in respect of Hornsea Three.

## 4.5 Habitats Regulation Assessment

4.5.1.1 Wherever a project that is not directly connected to, or necessary for the management of a European Site, is likely to have a significant effect on the Conservation Objectives of the site (directly, indirectly, alone or in-combination with other plans or projects) then an 'Appropriate Assessment' (AA) must be undertaken by the Competent Authority (Regulation 63 of the Habitats Regulations<sup>6</sup> and Regulation 28 of the Offshore Habitats Regulations<sup>7</sup>). The AA must be carried out before consent or authorisation can be given for the project.

4.5.1.2 A Report to Inform Appropriate Assessment (RIAA) has been produced to inform the HRA process for Hornsea Three (document reference number A5.2). This information will enable the Secretary of State (as the Competent Authority) to determine whether there will be an adverse effect on the integrity of any European Site(s) in view of their Conservation Objectives (COs) as a result of Hornsea Three.

4.5.1.3 The RIAA was prepared in accordance with Advice Note Ten: Habitats Regulations Assessment Relevant to Nationally Significant Infrastructure Projects (NSIPs) (PINS, 2016), which sets out a staged process to the assessment of the effects of plans or projects on European sites. Cumulatively, these stages are referred to as the Habitat Regulations Assessment, to clearly distinguish the whole process from the second stage within it, which is referred to as the 'appropriate assessment'. There are potentially up to four stages:

- i. Screening;
- ii. Appropriate Assessment;
- iii. Mitigation and alternatives; and
- iv. Imperative Reasons of Overriding Public Interest (IROPI).

4.5.1.4 In December 2016, Ørsted consulted on its HRA Screening Report (DONG Energy, 2016c). This formed part of the Screening stage, where the identification of the Likely Significant Effects (LSE) was reported, including which LSE cannot be ruled out. It was noted at this stage that the assessment provided in the Screening Report was based on Ørsted's understanding of the baseline environment and the scope and nature of Hornsea Three at that time.

4.5.1.5 In accordance with DCLG Guidance (DCLG, 2015), Ørsted consulted the following statutory and non-statutory bodies, as well as transboundary consultees on the Screening Report to gain evidence for the HRA:

- Scottish Natural Heritage;
- Joint Nature Conservation Committee (JNCC);
- Natural England;
- Royal Society for the Protection of Birds (RSPB);
- The Wildlife Trust (TWT);

- Norfolk Wildlife Trust;
- North Norfolk District Council;
- Broadland District Council;
- South Norfolk District Council;
- Norfolk County Council;
- Environment Agency;
- The Broads Authority;
- East Riding of Yorkshire Council;
- Centre for Environment, Fisheries and Aquaculture Science (Cefas); and
- Transboundary Consultees (Annex 5, document reference number A5.1.5).

4.5.1.6 It was noted at the Screening stage that further environmental survey and assessment work, consultee and advisor responses to the document, and refinements to the project design may change the initial assessment.

4.5.1.7 The HRA Screening Report initially identified 17 European Sites for which an LSE on one or more features could not be discounted. This list was further refined through consultation with Statutory Nature Conservation Bodies (SNCBs) and other organisations, such as TWT and the RSPB.

## 4.6 EIA and HRA Methodology

### 4.6.1 Evidence Plan

4.6.1.1 The Evidence Plan, initially developed by the Major Infrastructure Environment Unit (MIEU) of the Department for Environment, Food and Rural Affairs (Defra), is a voluntary mechanism to agree between applicants and statutory bodies upfront what information the Applicant needs to supply to the PINS as part of a DCO application. Whilst the process was initially aimed at ensuring compliance with the Habitat Regulations it has increasingly been applied to relevant EIA matters as well and is supported by PINS.

4.6.1.2 In preparing the Evidence Plan, Ørsted followed guidance provided within Habitat Regulations: Evidence Plans for Nationally Significant Infrastructure Projects (Defra, 2012). For the purpose of Hornsea Three, it was agreed with all participants in the Evidence Plan process that the Plan would cover those topics relevant to both Habitat Regulations and EIA regulations.

4.6.1.3 A Steering Group comprising of the PINS, Ørsted, Natural England, the Marine Management Organisation (MMO) and Cefas was established to develop and monitor the Hornsea Three Evidence Plan at key milestones in the process.

<sup>6</sup> The Conservation of Habitats and Species Regulations 2017

<sup>7</sup> The Conservation of Offshore Marine Habitats and Species Regulations 2017

4.6.1.4 EWGs were created to discuss topic specific issues with the relevant stakeholders. The aim of the EWGs was to discuss and agree (where possible) key elements of the EIA and HRA during the pre-application period. The process was iterative with each group working through the discussion points and establishing areas of agreement across all parties.

4.6.1.5 Table 4.3 identifies the EWGs that were established for Hornsea Three.

Table 4.3: Expert Working Groups

Expert Working Group	Participants
Offshore Ornithology	Natural England; The RSPB; and MMO.
Marine Mammals	Natural England; JNCC; MMO; and TWT <sup>8</sup> .
Benthic Ecology, Marine Processes and Fish and Shellfish Ecology (BE, MP and FSE)	Natural England; MMO; JNCC; Cefas; and TWT <sup>9</sup> .
Onshore Ecology	Natural England; MMO; Local Planning Authorities; Norfolk Wildlife Trust; and The RSPB.

4.6.1.6 Throughout the process the Evidence Plan was regularly updated where necessary to document discussions held with the EWGs and comments were implemented into the application. For example, this included requests for additional benthic samples. The final Evidence Plan outlining the areas of agreement and disagreement between the relevant parties at the point of application, including a summary of the meetings that took place is available in Annex 1 of this Consultation Report (document reference number A5.1.1).

<sup>8</sup> Representatives from the TWT, who were not part of the EWG at the start, joined the EWG from April 2016.

<sup>9</sup> Representatives from the TWT, who were not part of the EWG at the start, joined the EWG from February 2017.

## 4.7 Transboundary Consultation

### 4.7.1 Legislation and guidance

4.7.1.1 Transboundary effects arise when impacts from the development within one European Economic Area (EEA) state affects the environment of another EEA state(s). The need to consider such transboundary effects has been embodied by the United Nations Economic Commission for Europe Convention on EIA in a Transboundary Context (commonly referred to as the 'Espoo Convention'). The Convention requires that the assessments are extended across borders between Parties of the Convention when a planned activity may cause significant adverse transboundary impacts.

4.7.1.2 The Espoo Convention has been implemented in the UK by the 2009 EIA Regulations. Regulation 24 sets out a prescribed process of consultation and notification. In addition, PINS Advice Note Twelve: Transboundary Impacts (PINS, 2015b) sets out the procedures for a consultation in association with an application for a DCO where such a development may have significant transboundary impacts.

4.7.1.3 PINS Advice Note Twelve sets out the procedure for screening, consulting and assessing transboundary issues. This procedure involves the following broad steps which are split into two stages:

- **Stage 1:**
  - Developer carries out pre-application consultation with EEA State(s);
  - Developer notifies PINS of EIA potentially requiring transboundary assessment;
  - Developer prepares initial matrix to identify potential significant impacts on other EEA State(s) and provides to PINS;
  - The Secretary of State undertakes transboundary screening for potential significant impacts;
  - The Secretary of State notifies other relevant EEA State(s), including London Gazette notice; and
  - Other EEA State(s) notify PINS of their wish to participate in the consultation.
- **Stage 2:**
  - Developer submits DCO application, including translated Non-Technical Summary and a Consultation Report summarising pre-submission transboundary consultation that took place;
  - The Secretary of State undertakes consultation with other relevant EEA State(s);
  - Other EEA State(s) consult with their public and provide comments to the Secretary of State; and
  - Consultation responses are taken account of by the Secretary of State in the decision-making process.

4.7.1.4 Advice Note Twelve also sets out the roles of PINS, other EEA states and the applicant. In respect of the latter, the applicant has no formal role under the Regulation 24 process, as the duties prescribed by Regulation 24 in notifying and consulting with other EEA States on potential transboundary impacts are the responsibility of the Secretary of State.

#### 4.7.2 Screening and identification of the transboundary consultees

4.7.2.1 In the Hornsea Three Scoping Report (DONG Energy, 2016a), Ørsted noted that, due to the Hornsea Three array area being located adjacent to the UK's international boundary, consideration would be given to the effects on the environment of other EEA member states, including cumulative impacts with other projects, in accordance with Regulation 24 of the EIA Regulations and the Espoo Convention (1991).

4.7.2.2 In preparing the Scoping Report, Hornsea Three had regard to PINS Advice Note Twelve and undertook an initial identification and screening of transboundary impacts, which can be found in Appendix A: Transboundary Impacts Screening of the Hornsea Three Scoping Report (DONG Energy, 2016a). This Appendix was intended to provide sufficient information; such that the Secretary of State could evaluate the likelihood of such effects occurring and the need, if any, for transboundary consultation with other member states during the pre-application period, and where necessary after the application being made.

4.7.2.3 In the Scoping Opinion, the Secretary of State noted that the Scoping Report had acknowledged the potential for transboundary impacts and recommended that the Applicant provide to the Secretary of State as soon as possible any additional information about potential significant transboundary effects and identify the affected state(s). The Secretary of State stated that the Applicant should address this matter in each topic area of the Environmental Statement and summarise the position on transboundary effects of the proposed development, considering inter-relationships between any impacts in each topic area. Transboundary effects have been assessed in the Environmental Statement (document reference number A6).

4.7.2.4 For the purposes of identifying any cumulative effects with other developments in the area, applicants should also consult consenting bodies in other EU states to assist in identifying those developments. Ørsted wrote to all transboundary consultees introduce Hornsea Three, a copy of the Scoping Report and HRA Screening Report was provided and a meeting offered, should they have any comments or concerns (see section 4.7.3 of this Consultation Report).

4.7.2.5 The Secretary of State recommended that consideration should be given in the Environmental Statement to any LSEs on the environment of another Member State of the European Economic Area. In particular, the Secretary of State recommends consideration should be given to discharges to the air and water and to potential impacts on migrating species and to impacts on shipping and fishing areas.

4.7.2.6 In their response to the Hornsea Three Scoping Report, the MMO raised concerns about the decision to screen out transboundary effects on marine processes, as the Dutch Economic Exclusion Zone (EEZ) is 10 km from the proposed development. The MMO also advised that transboundary effects on benthic ecology should be screened into the EIA process given the proximity to Klaverbank Site of Community Importance (SCI). The Secretary of State advised Ørsted to consider these comments and to revisit their approach to transboundary screening if necessary. These comments have been considered by Ørsted in Table 3.1 in volume 4, annex 5.4: Transboundary Impacts Screening (document reference number A6.4.5.4) of the Environmental Statement.

#### 4.7.3 Consultation Activities

4.7.3.1 Between December 2016 and July 2017, Ørsted wrote to the consenting bodies in the seven EEA states in which there is potential for LSE on the environment; including Belgium, Denmark, Germany, France, the Netherlands, Norway and Sweden. The initial contacts used in this consultation were those identified by Ørsted, and included wider government ministries with responsibility for nature conservation where these could be established. The email was accompanied by the Transboundary Impacts Screening and Habitats Regulations Assessment: Screening Report (DONG Energy, 2016), on which comment was sought and a meeting requested to discuss these documents in more detail.

4.7.3.2 Ørsted subsequently met with the Dutch Ministry for Infrastructure and Environment (Rijkswaterstaat (RWS)), who had requested a meeting in May 2017. In addition, Ørsted consulted various international fishing and shipping organisations and government departments through the development process, both during statutory consultation periods and on a non-statutory basis. A summary of Ørsted's engagement with fishing organisations is provided in section 6.2.7.

4.7.3.3 On 30 June 2017, PINS published a notice in the London Gazette (in accordance with Regulation 24 of the EIA Regulation), stating that Hornsea Three is likely to have significant effects on the environment of Belgium, Denmark, France, the Netherlands, Germany, Iceland, Sweden and Norway.

4.7.3.4 PINS also wrote to the above EEA States on 12 June 2017 and set a deadline of 11 August 2017, by which time they should indicate their interest in participating in the procedure for examining and determining the application under the 2008 Act. Ørsted was also notified by letter.

4.7.3.5 PINS has a duty to consult any EEA State that registers a relevant response to the Regulation 24 notice. To date, Ørsted is aware that France, Belgium, Denmark, Norway and the Netherlands have notified PINS of their interest. Relevant documents relating the requirements under Regulation 24, including copies of the responses received are provided in Annex 5 to this Consultation Report (document reference number A5.1.5).

## 5. Statement of Community Consultation

### 5.1 Summary

5.1.1.1 Ørsted published its Statement of Community Consultation (SoCC) at an early stage in the development process for Hornsea Three to encourage early participation from local communities in the development process and to ensure it had aligned with local authorities on how best to communicate with local community. The SoCC detailed the nature of the development and set out the process by which local communities would be consulted on the proposed development.

5.1.1.2 Consultation with local communities was carried out in accordance with the commitments set out in the SoCC, which included a minimum of two rounds of consultation. Evidence of compliance with the SoCC is outlined in section 5.8 of this Consultation Report.

5.1.1.3 Over the course of the pre-application period, Ørsted refined its approach to community consultation, focussing its consultation activities in response to feedback and informed by the ongoing design development. Additional consultation activities were carried out, above and beyond the commitments made in the SoCC. These additional activities are outlined in section 0 of this Consultation Report.

### 5.2 Statutory Requirements and Guidance

5.2.1.1 Under section 47 of the 2008 Act, the Applicant has a duty to prepare a SoCC, which sets out how it intends to consult local communities on the proposed development, and must conduct its consultation in line with this statement. The Applicant must consult on and agree the contents of the SoCC with each of the local authorities, in whose area the proposed development is situated (as prescribed in section 43(1) of the 2008 Act).

5.2.1.2 A table summarising how Ørsted has complied with the legislative requirements is provided in Annex 2 to this Consultation Report (document reference number A5.1.2).

### 5.3 Defining the Consultation Zone

5.3.1.1 In the case of Hornsea Three, land potentially affected by the onshore works comes under the following local authority jurisdictions (Figure 8.1):

- North Norfolk District Council;
- Broadland District Council;
- South Norfolk Council; and
- Norfolk County Council.

5.3.1.2 In addition to those organisations listed above, the following local authorities adjoining the Hornsea Three onshore cable corridor were consulted on the draft SoCC:

- Norwich City Council;
- Breckland District Council;
- Broads Authority; and
- Great Yarmouth Borough Council.

5.3.1.3 The boundaries of these local authorities defined the wider Consultation Zone across which consultation activities took place. As the Hornsea Three design was refined, consultation activities were focussed in those areas closest to the proposed development; however, wider channels were maintained, including provision of information at Community Access Points (CAP sites) and information sharing with Parish Councils across the wider area.

### 5.4 Summary of the SoCC rationale

5.4.1.1 The Hornsea Three SoCC provided a high-level introduction to Hornsea Three (based on the information available at that time) and the planning process for NSIPs. It described the consultation process, including:

- Who would be consulted and when;
- What would be consulted on and where this information could be found;
- How interested parties could engage in the process; and
- How consultation responses would be considered by Ørsted.

5.4.1.2 Ørsted sought to keep the Hornsea Three SoCC as simple and concise as possible. The information was displayed across a foldable A3 poster to make it more engaging and to encourage individuals to take copies away with them<sup>10</sup>. The information was broken down by numbered subheadings to guide viewers through the document and maps and diagrams were used to present some of the more technical information.

5.4.1.3 Ørsted adopted an iterative, phased approach to community consultation for Hornsea Three and a high-level timeline illustrating when different consultation activities were planned for each phase was included in the SoCC<sup>11</sup>. In the Hornsea Three SoCC, Ørsted committed to holding a minimum of one round of community consultation events per phase and to produce interim Consultation Summary Reports, which would summarise the key issues raised at those events.

5.4.1.4 It was recognised that at the stage at which the Hornsea Three SoCC was published, not all details were known, and therefore flexibility was built into the SoCC to enable Ørsted to adjust its approach to consultation based on refinements to the proposal and feedback received.

<sup>10</sup> The web and publication version varied slightly to the printed version; however, the content was the same in both versions.

<sup>11</sup> This timeline was maintained throughout the consultation and updated to include additional rounds of consultation that were not planned at the time of publishing the SoCC.

5.4.1.5 By implementing a phased approach to community consultation, Ørsted was able to focus the consultation from the wide search area initially presented in the SoCC, to those areas most directly impacted by the proposal. Ørsted actively sought feedback on the consultation process itself and where possible, the approach was refined to ensure that the consultation was effective and appropriate for the local area.

5.4.1.6 Section 0 of this Consultation Report details some of the additional consultation activities that were undertaken, beyond those set out in the Hornsea Three SoCC, including an additional round of community consultation events under Phase 1 (Phase 1.B) and the provision of additional tools, including the Interactive Map to make the information more digestible.

## 5.5 Consultation on the draft SoCC

5.5.1.1 Ørsted held a series of informal meetings and telephone calls with the relevant local authorities between March 2016 and July 2016 to introduce Hornsea Three and to discuss the proposed approach to community consultation under section 47 of the 2008 Act.

5.5.1.2 Ørsted formally consulted the local authorities listed in section 5.3 of this Consultation Report on the contents of the draft SoCC in July/August 2016 (Annex 10 to this Consultation Report, document reference number A5.1.10). The draft SoCC was submitted to the local authorities for statutory consultation on 20 July 2016<sup>12</sup>, accompanied by an explanatory note. Responses were requested by 9 September 2016, compliant with the statutory minimum of 28 days under section 47(3) of the 2008 Act.

5.5.1.3 Comments on the draft SoCC were received from the following local authorities:

- North Norfolk District Council;
- Broadland District Council;
- South Norfolk District Council;
- Norwich City Council; and
- Norfolk County Council.

5.5.1.4 Ørsted also had regard to comments received from PINS through informal meetings and as detailed in their formal response which was focussed on the legislative requirements and wider guidance.

5.5.1.5 A summary of the responses received on the draft SoCC is provided below:

- Further detail should be provided in terms of the nature of proposed onshore developments (see section 5.5.1.6 of this Consultation Report);
- Ørsted should consider school holidays when planning any community consultation events to maximise local attendance;
- Ørsted should clearly set out the steps for how interested parties will be notified when the Consultation Summary Report for each consultation phase is available and in the 'Next Steps' section, how interested parties will be notified that the application has been submitted (should be accepted by PINS);
- Ørsted should update the Council offices opening times included in Hornsea Three SoCC where relevant; and
- As the Hornsea Three SoCC will be a fold-out poster, Ørsted should consider how to make it clear in which order the sections should be read.

5.5.1.6 At the stage at which the draft SoCC was prepared, detailed information on the nature of the proposed development was not available. It was noted that the information provided within the SoCC regarding the onshore elements was not intended to be exhaustive and further information on the nature of the proposed development would be provided in the Hornsea Three Scoping Report (DONG Energy, 2016a). It was explained in the SoCC that members of the public could access this report online and at the Phase 1 community consultation events (subsequently referred to as 'Phase 1.A').

5.5.1.7 All comments received were considered by Ørsted in the final drafting of the Hornsea Three SoCC and a summary outlining the amendments made in response to comments received was issued to the relevant local authorities and PINS. Copies of the responses received and a summary of how Ørsted had regard to comments received is included in Annex 10 of this Consultation Report (document reference number A5.1.10).

## 5.6 Final SoCC

5.6.1.1 The Hornsea Three SoCC sets out the two-phase consultation programme for Hornsea Three. The phased approach allows for an iterative process in which consultees are able to observe the project changes in response to their feedback. As well as the two main phases of consultation as outlined in the SoCC, further engagement took place throughout the pre-application period with a number of technical consultees who have specialist knowledge within the EIA topic areas.

5.6.1.2 A copy of the final Hornsea Three SoCC, which was produced in two different formats<sup>13</sup>, is included in Annex 10 of this Consultation Report (document reference number A5.1.10).

<sup>12</sup> A hard copy of the Hornsea Three SoCC was provided to the local authorities on 26 July 2016.

<sup>13</sup> For the website and notifications and the printed foldout leaflet.

## 5.7 Publication of the SoCC

5.7.1.1 The Hornsea Three SoCC was publicised in full in several local newspapers between 3 October 2016 and 11 October 2016 in accordance with section 47(6) of the 2008 Act. Table 5.1 details the newspapers that were used to publicise the SoCC. Copies of the SoCC as it appeared in each of these publications are included in Annex 10 of this Consultation Report (document reference number A5.1.10).

Table 5.1: Publications advertising the SoCC.

Publication	Coverage
Eastern Daily Press	Norfolk, North Suffolk, East Cambridgeshire
Norwich Evening News	Norwich
North Norfolk News	Cromer, Sheringham, Holt, North Walsham, Aylsham, Stalham
Diss Mercury	Diss, Harleston and Long Stratton
Wymondham and Attleborough Mercury	Wymondham, Attleborough, Hingham, Old and New Buckenham, and Mulbarton

5.7.1.2 The SoCC was made available for inspection by the public on the former Hornsea Three website ([www.dongenergy.co.uk/hornseaproject3](http://www.dongenergy.co.uk/hornseaproject3))<sup>14</sup> from 30 September 2016 and in hard copy at the CAP sites, including the relevant District and County Council offices listed in Annex 10 of this Consultation Report (document reference number A5.1.10).

## 5.8 Statement of Compliance with SoCC

5.8.1.1 A summary of the actions undertaken by Ørsted to meet the obligations as outlined in the SoCC are presented in Table 5.2.

Table 5.2: Summary of compliance with the SoCC.

Commitment made in the SoCC	Evidence of compliance
<b>Who will we consult</b>	
Ørsted will seek input from the local authorities to identify parties that could have an interest in our proposed development.	As part of the consultation on the draft SoCC, the local authorities were asked to consider the list of stakeholders identified for Hornsea Three. Further parties were identified through subsequent meetings with the local authorities during the pre-application period and were subsequently included in the consultation.
Ørsted will consult with communities living in the vicinity of the works, local authorities, owners, tenants and occupiers of the land affected by the DCO application, commercial stakeholders and environmental bodies among others.	Ørsted consulted with local communities, land interests and statutory bodies and wider stakeholders on Hornsea Three. Details of the consultation undertaken is provided in following sections of this Consultation Report.
<b>Environmental information</b>	
In accordance with Regulation 10 of the 2009 EIA Regulations, Ørsted will undertake an EIA and documents including a Scoping Report, Preliminary Environmental Information Report (PEIR) and Environmental Statement (as part of the final application) will be made available for public inspection.	Ørsted made copies of the documents that comprise the EIA available for public inspection during the consultation. All documents relating to the EIA and HRA were made available on the Hornsea Three website ( <a href="http://www.hornseaproject3.co.uk">www.hornseaproject3.co.uk</a> ); a hard copy of the Hornsea Three Scoping Report (DONG Energy, 2016a) was made available for public inspection at the Phase 1.A and Phase 1.B community consultation events (see section 7 of this Consultation Report), the PEIR (DONG Energy, 2017) was made available in different formats at a number of locations during the Statutory Consultation ("Phase 2.A) and at the Phase 2 community consultation events (see section 8.3.3 of this Consultation Report). Details of where the Environmental Statement can be viewed are provided within volume 1, chapter 1: Introduction (document reference number A6.1.1) of the Environmental Statement.
Local views will be sought on the Preliminary Environmental Information Report.	Local communities were consulted on the contents of the PEIR. This consultation ran in parallel to statutory consultation under sections 42 and 48 of the 2008 Act. A Non-Technical Summary (DONG Energy, 2017) was produced and a document summarising the consultation was issued to residents and made available at locations close to the Hornsea Three onshore cable corridor.
<b>Public consultation</b>	
Copies of the SoCC and newsletters at the council offices.	Hard copies of the Hornsea Three SoCC were sent to local authority offices on 30 September 2016 to make available for public inspection <sup>15</sup> . Hard copies of the community newsletters were delivered to the council offices as detailed in the SoCC and wider CAP sites for public inspection. Further copies were available on demand.

<sup>14</sup> The SoCC was also made available on the new website ([www.hornseaproject3.co.uk](http://www.hornseaproject3.co.uk)) after the Company name change and website migration (section ).

<sup>15</sup> This included all local authorities consulted on the draft SoCC as outlined in section 5.3 of this Consultation Report.

Commitment made in the SoCC	Evidence of compliance
Ørsted will consult via several methods including; briefing sessions and stakeholder meetings, consultation events, advertising and updates in local media, literature. During the consultation period, Ørsted will hold a minimum of two rounds of community consultation events at various locations across the Consultation Zone.	Ørsted consulted with local community through a variety of channels both informally throughout the consultation and directly during each round of consultation under section 47. Details of the consultation activities undertaken under section 47 of the Act 2008 is provided in sections 7 and 8 of this Consultation Report.
Community consultation events listed under Phase 1 would be held at the places and times set out in the SoCC.	The events for Phase 1 were undertaken in accordance with the information provided in the Hornsea Three SoCC (DONG Energy, 2016b) (section 7.2.2). Ørsted held an additional round of community consultation events under Phase 1 Consultation. Details of these events, including how these were publicised is provided in section 7.3.2 of this Consultation Report.
A second round of community consultation events would be held during Phase 2 Consultation, at which point Ørsted would specifically consult on the contents of the PEIR. The dates and timings of these events and the deadline for feedback will be publicised nearer the time on the Hornsea Three website and in local media.	In accordance with the Hornsea Three SoCC, Ørsted held a round of community consultation events in locations across the Consultation Zone in parallel to statutory consultation under section 42 on the PEIR under Phase 2. These events were publicised in advance of the consultation in the June 2017 community newsletter, at the start of the consultation and during the consultation in local media. More information on how the events were publicised is provided in section 8.3.2.16 of this Consultation Report. The event details were also listed in the public notice publicised in accordance with section 48 of the 2008 Act (section 8.3.4 of this Consultation Report).
Consultation documents will be available to view and download from the Hornsea Three website, should members of the local community not be able to attend the events in person and at locations in the vicinity of the proposed development.	The consultation materials were made available on the Hornsea Three website during the consultation period, for those parties unable to attend in person. This also included an online feedback form for providing comments on the proposal.
All event venues will have wheelchair access and documents would be available in different formats including braille, audio or large font on request.	All venues used for the community consultation events were wheelchair friendly. At the events, copies of the Hornsea Three SoCC were available in different formats, including braille, audio and large font and available on request for other consultation documents.
Consultees will be given the opportunity to comment on the proposed plans by completing a feedback form.	During each round of consultation under section 47 of 2008 Act feedback forms were provided in hard copy at the events and electronically via the Hornsea Three website for those parties under to attend the events in person. A copy of the feedback form for each round of consultation is provided within Annex 11 (Phase 1.A), Annex 12 (Phase 1.B) and Annex 14 (Phase 2) of this Consultation Report (document reference numbers A5.1.11, A5.1.12 and A5.1.14 respectively).
Each phase of community consultation will last no less than 28 days from the start of the consultation to the deadline for responses.	Each round of community consultation under section 47 lasted a minimum of 28 days. Further information is provided in sections 7 and 8 of this Consultation Report. For the community consultation events under Phase 2.A, these were held during the second half of the consultation period, to avoid the Summer holiday period (as recommended by the local authorities) and outlined in the SoCC (see Annex 10, document reference number A5.1.10). A document detailing the consultation and deadline for responses was circulated to the local community at the start of the consultation period, which in total was more than 28 days.

Commitment made in the SoCC	Evidence of compliance
After each set of community consultation events a short interim Consultation Summary Report will be produced and made available for public inspection.	Following each set of community consultation events, Ørsted produced a Consultation Summary Report. These reports were published on the Hornsea Three website and circulated to the distribution list, Parish Councils and CAP sites. These reports are provided in Annexes 13 (Phase 1.A and Phase 1.B) and 14 (Phase 2) to this Consultation Report (document reference numbers A5.1.13 and A5.1.14 respectively).
Regular newsletters and key documents will be available throughout the consultation period.	Quarterly newsletters providing updates on Hornsea Three were published on the Hornsea Three website and distributed to residents, those parties who had registered their interest in Hornsea Three, Parish Councils and CAP sites. Copies of the Hornsea Three community newsletters are provided in Annex 16 of this Consultation Report (document reference number A5.1.16).
<b>Next steps</b>	
Consider and respond to issues raised and produce a Consultation Report.	Ørsted has produced this Consultation Report and the supporting annexes which details the issues raised during the consultation and how Ørsted has had regard to these in the final application.
Copies of the full DCO application will be available at some of the council offices above.	The full DCO application will be available at in soft copy. Due to space limitation the DCO will be available in soft copy only at the council offices.

## 5.9 Additional community consultation activities

5.9.1.1 In addition to those consultation activities outlined in the Hornsea Three SoCC, Ørsted undertook additional activities during the consultation period in response to feedback and to provide local communities with further opportunities to comment on the proposal and encourage greater engagement in the consultation process.

### **Additional consultation events**

5.9.1.2 Ørsted held an additional round of community consultation events in March 2017, as part of its first phase of consultation (referred to in this Consultation Report as 'Phase 1.B'). This additional round of consultation was introduced in response to feedback from local communities as part of the first round of consultation (Phase 1.A), where communities expressed an interest for further detailed information than that initially shown and early refinement of the proposal. Further information on all the consultation activities undertaken under Phase 1 can be found in section 7 of this Consultation Report.

### **Additional advertisement channels**

5.9.1.3 In addition to the advertising channels used to publicise the Phase 1.A community consultation events, Ørsted commissioned a geographically targeted social media campaign prior to and during the Phase 1.B and Phase 2.A community consultation events to encourage greater attendance.

### **Additional consultation tools**

- 5.9.1.4 In addition to tools set out in the Hornsea Three SoCC, new information channels were added to the Hornsea Three website ([www.hornseaproject3.co.uk](http://www.hornseaproject3.co.uk)) to provide an alternative option to the traditional methods. This included an Interactive Map and blogs by members of the Hornsea Three team, providing more information on what goes on behind the scenes to inform the final proposal.

### **Wider engagement**

- 5.9.1.5 During the consultation period, Ørsted participated in a number of local events to increase local awareness of Hornsea Three and to engage with different groups that may not have otherwise engaged in the consultation process.
- 5.9.1.6 In March 2017, Ørsted participated in the East of England Energy Group's (EEEGR) Annual Southern North Sea (SNS) Conference. The event, which took place over two days at the Norfolk Showground Arena near Norwich, attracted over 1,000 delegates from across the industry and supply chain, including local businesses. This was an opportunity for Ørsted representatives to meet with local suppliers and college students early in the development process and to provide more information on Hornsea Three and the opportunities available to engage in the consultation.
- 5.9.1.7 In September 2017, Ørsted participated in the "Greenbuild – Celebrating Norfolk" event, which coincided with the Phase 2 community consultation events. This was another opportunity for local communities to find out more about Hornsea Three and discuss their thoughts and any concerns with Ørsted representatives.

## **5.10 Company name change**

- 5.10.1.1 It was recognised by Ørsted, that a change in company name in the middle of the pre-application consultation period (whilst outside the statutory consultation periods) could cause some confusion. To ensure stakeholders were made aware of the change, Ørsted notified everyone on the mailing list and explained, where relevant the significance for Hornsea Three. Information on the change in Company name was also included in the community newsletter (issued in October 2017) and the Phase 2 Consultation Summary Report (issued in November 2017).
- 5.10.1.2 To avoid confusion, Ørsted retained the Hornsea Three logo and colour scheme on all external documents and letters and continued to include information on the company name change in subsequent publications and presentations, including the Further Statutory Consultation.

- 5.10.1.3 As part of the company name change, it was necessary for Ørsted to migrate the Hornsea Three website (previously [www.dongenergy.co.uk/hornseaproject3](http://www.dongenergy.co.uk/hornseaproject3)) to a new domain ([www.hornseaproject3.co.uk](http://www.hornseaproject3.co.uk)). Information on this change was included in the November 2017 newsletter and anyone attempting to access the old website would be automatically redirected to the new website to minimise any potential confusion and ensure access to project information was maintained. In addition, it was ensured that all postal addresses, contact emails and freephone numbers remained the same.

## **6. Non-Statutory Consultation**

### **6.1 Summary**

- 6.1.1.1 Ørsted consulted informally on Hornsea Three throughout the pre-application consultation period from March 2016 up until submission of the DCO application. This included regular meetings with key stakeholders including, statutory bodies, the local authorities (defined in section 5.3 of this Consultation Report), Parish Councils and landowners.
- 6.1.1.2 Ørsted maintained information lines including a dedicated website with Interactive Map and Document Library, Freephone information line, email address and quarterly newsletters. As the consultation evolved, a Frequently Asked Questions (FAQ) document was produced and updated regularly based on common queries and to provide more information on specific topics. Company press releases were also issued to announce different consultation rounds and any significant changes made to the Project during the pre-application period.

### **6.2 Consultation Activities**

#### **6.2.1 Information channels**

- 6.2.1.1 Throughout the pre-application consultation period, information on Hornsea Three was available on demand, electronically on the Hornsea Three website<sup>16</sup>, in hardcopy at CAP sites<sup>17</sup> and via the information lines, including the Hornsea Three email ([contact@hornsea-project-three.co.uk](mailto:contact@hornsea-project-three.co.uk)) and Freephone Information Line (0800 0288 466).

<sup>16</sup> The previous Hornsea Three website ([www.dongenergy.co.uk/hornseaproject3](http://www.dongenergy.co.uk/hornseaproject3)) was migrated to the new domain ([www.hornseaproject3.co.uk](http://www.hornseaproject3.co.uk)) on 6 November 2017 in line with the change in Company name. All traffic to the old website was automatically redirected to the new website to avoid confusion.

<sup>17</sup> Documents at these locations was updated when new versions were available.

6.2.1.2 Interested parties were invited to “Register Your Interest” in Hornsea Three to sign up to receive updates, including the Hornsea Three community newsletters by email or post. Interested parties could register their interest by completing an online form via the Hornsea Three website, through the information lines or in person at the events and briefings by completing feedback forms or by providing their details on the sign in sheets.

6.2.1.3 All the consultation documents were made available on the Hornsea Three website in the “Documents Library” ([www.hornseaproject3.co.uk/en/Documents-library](http://www.hornseaproject3.co.uk/en/Documents-library)). Links were also provided where relevant across the website, to aid user navigation. For example, in the “Public Consultation” section of the website, links were provided to the relevant documents for each round of community consultation, including the relevant Consultation Summary Report.

#### CAP Sites

6.2.1.4 Documents were made available at approximately 45 CAP sites across the Consultation Zone. The CAP site locations are shown on Figure 6.3 and a list was provided in the Consultation Process document, which was available on the website. These locations were selected as they provided good coverage across the wider Consultation Zone (outlined in section 5.3). Additional locations were added in the vicinity of the Hornsea Three onshore cable corridor as this developed and in response to feedback. Provision of consultation documents at these locations enabled consultees from across the wider Consultation Zone access to relevant information in a hard copy format.

6.2.1.5 The list of CAP sites varied slightly during the consultation period, where additional sites were identified for better coverage or where locations were no longer able to host documents. The CAP sites were maintained on the Interactive Map on the Hornsea Three website so that stakeholders could keep a track of these locations (see section 6.2.1.9).

#### Consultation Timeline

6.2.1.6 A timeline outlining the consultation activities (Figure 6.1), relevant for both local communities and statutory consultees, was maintained throughout the consultation and made available on the Hornsea Three website and in consultation documents to ensure interested parties were aware of the consultation activities associated with Hornsea Three and where Hornsea Three was in the pre-application consultation process. A timeline marker was added to show where Hornsea Three currently sat in relation to the consultation and application timeline. This allowed stakeholders insight into what lay ahead and the opportunities for them to engage in the consultation process.

6.2.1.7 This timeline was first published in the Hornsea Three SoCC and was maintained throughout the consultation to reflect additional rounds of consultation under sections 42 and 47 of the Act 2008. The timeline was available on the Hornsea Three website and within external presentations stakeholders, including the Parish Council meetings (see section 6.2.6).

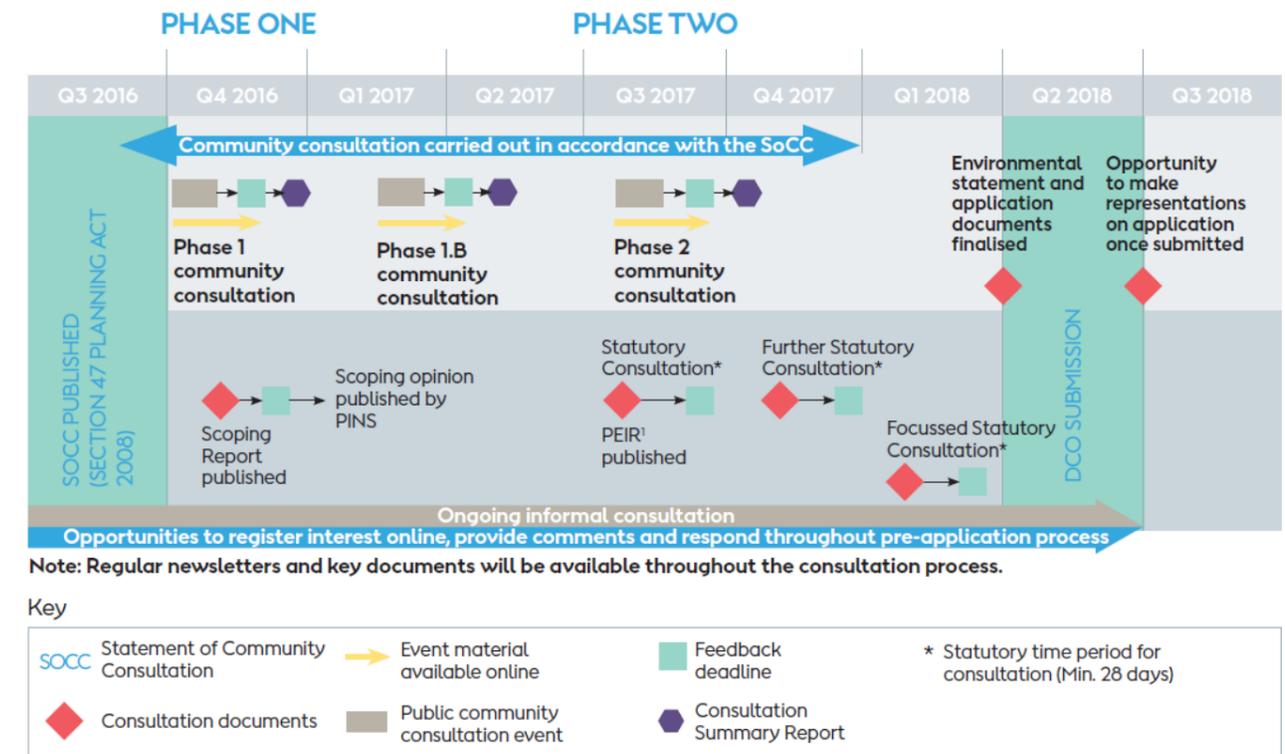


Figure 6.1: Diagram showing the consultation programme for Hornsea Three<sup>18</sup> [Preliminary Environmental Information Report].

#### Interactive Map

6.2.1.8 In addition to detailed Ordinance Survey (OS) maps, Ørsted published an Interactive Map on the Hornsea Three website in December 2016<sup>19</sup> (Figure 6.2) in response to feedback. This map displayed the proposed location for Hornsea Three and the associated infrastructure onshore and offshore. Interested parties could customise their search according to their needs. This included entering postcodes into the search bar to zoom in to the section of the Hornsea Three onshore cable corridor or changing the base map according to their interests.

<sup>18</sup> This diagram has been updated since it first featured in the SoCC (DONG Energy, 2016), and had an overlain red dashed line running vertically along this timeline at different times during the consultation process to ensure the audience was aware where each event/consultation/submission was placed timewise in relation to the initiation of the project and final submission.

<sup>19</sup> Hornsea Three Interactive Map: <http://hornseaproject3.co.uk/Interactive-Map>

6.2.1.9 The Interactive Map was maintained throughout the consultation and further details were added for example proposed storage compounds, the main compound, access routes and Horizontal Directional Drill (HDD) points as the Hornsea Three design matured. In addition to enabling personalised searches, the Interactive Map was also used as a tool to provide feedback to interested parties, particularly in relation to the development of the Hornsea Three onshore cable corridor.

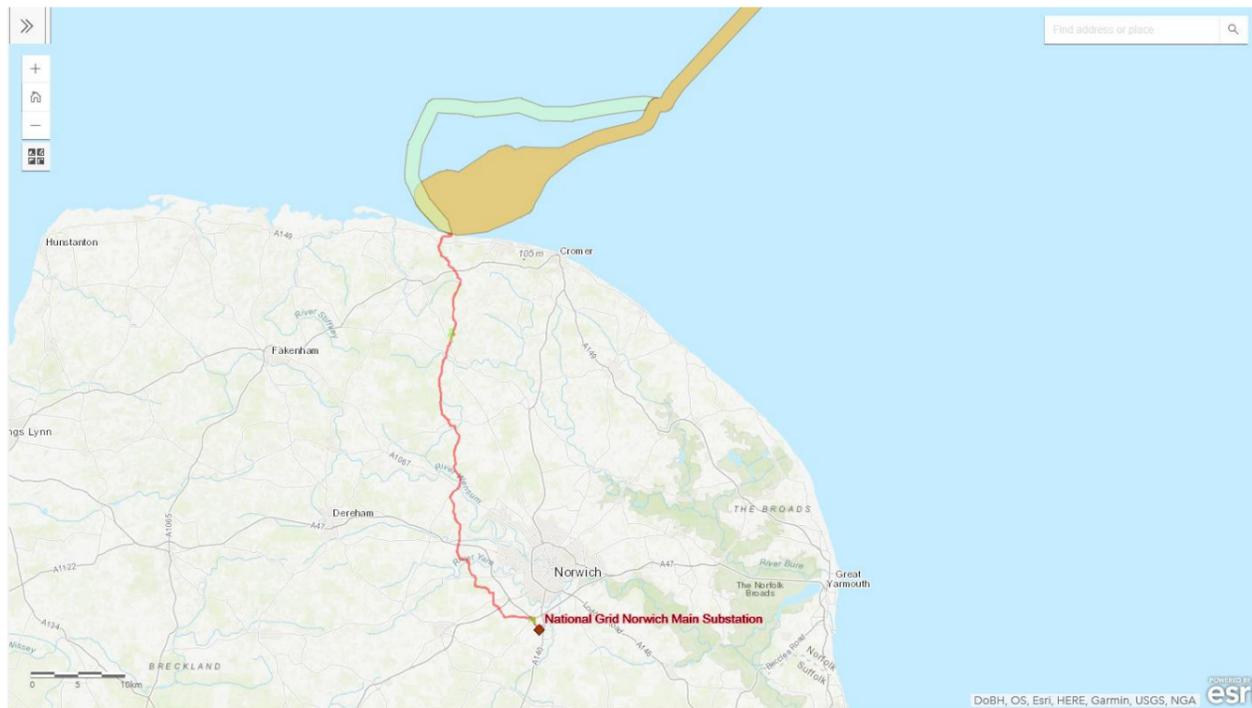


Figure 6.2: Screenshot of Interactive Map on Hornsea Three website (extracted February 2018).

### Frequently Asked Questions (FAQs)

6.2.1.10 In response to common questions received via the information lines, Ørsted developed a Frequently Asked Questions (FAQ) document. The FAQ was first published on the Hornsea Three website in the Documents Library in April 2017 and was maintained throughout the pre-application period to reflect changes made to the proposal and to incorporate additional questions raised at different stages of the consultation<sup>20</sup>. The FAQ was an important tool alongside the Consultation Summary Reports, produced in association with each round of community consultation events, for providing feedback to local communities and interested parties.

## 6.2.2 Expert Working Groups (EWG)

6.2.2.1 EWGs were established as part of the Evidence Plan process, to agree the evidence and approaches that have underpinned the technical assessments and to discuss topic specific issues with the relevant stakeholders (section 4.6.1). The EWGs met regularly during the pre-application period to discuss and agree (where possible) key elements for the EIA. A summary of the programme of meetings is outlined in Annex 1, Appendix B-F to this Consultation Report (document reference number A5.1.1).

## 6.2.3 MCZ Working Group

6.2.3.1 Ørsted established the MCZ Working Group to enable focussed discussion on the key issues relating to the MCZ that were relevant to Hornsea Three specifically, following informal discussions as part of the BE, MP and FSE EWG. This group included representatives from the key regulatory bodies and their advisors and statutory nature conservation bodies.

## 6.2.4 EIA Road Maps

6.2.4.1 Ørsted established Road Maps for several EIA topics that fell outside of the Evidence Plan. These Road Maps followed a similar approach to the Evidence Plan to identify and agree the information Ørsted would supply to PINS as part of the DCO application for Hornsea Three.

6.2.4.2 The Road Maps set out a programme of activities during the development of the EIA and were designed to provide greater certainty to all parties on the amount and range of evidence Ørsted should collect. Through adopting a staged approach to consultation, the Road Maps helped to address and agree issues earlier in the pre-application process, so that robust, streamlined decisions could be made, focussing evidence requirements so they were proportionate to the NSIP's potential impacts.

6.2.4.3 Through the Road Maps, Ørsted sought to;

- Agree on the scope, approach and methodologies employed for site specific surveys (if required);
- Agree the methods for data analysis (if required);
- Agree worst-case parameters for the assessment(s);
- Agree methods for assessment(s) (including where possible interpretation of impacts and levels of significance);
- Agree on methods employed to determine significance of impacts; and
- Document key areas of agreement and disagreement and progress in each topic area.

6.2.4.4 The Road Maps were intended to be working documents that were developed by the parties involved on an on-going basis through the development of the EIA, continuing up until the point of application. Ørsted clearly separated these Road Maps from the EWGs which formed part of the Evidence Plan to avoid confusion.

<sup>20</sup> This document was updated in July 2017, November 2017 and February 2018.

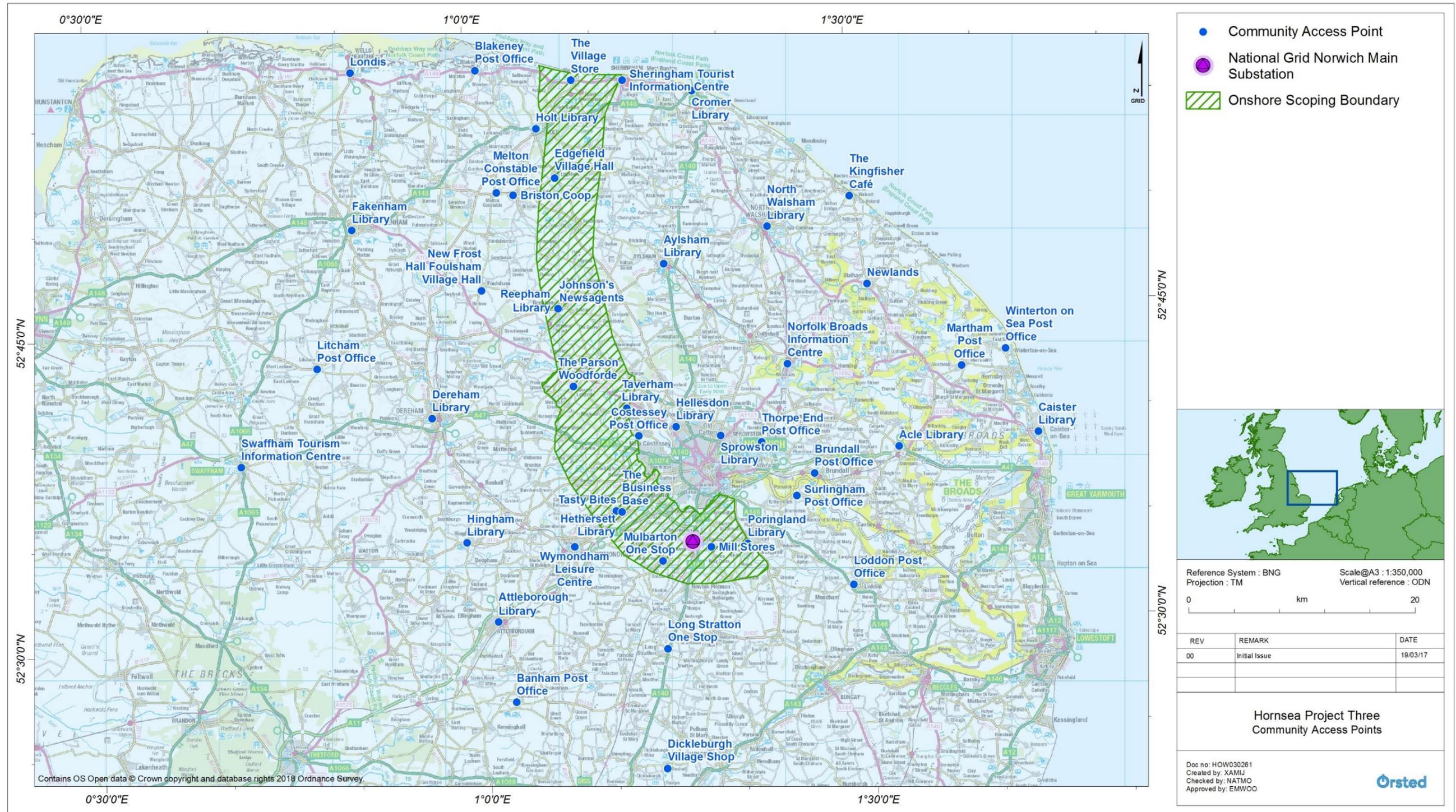


Figure 6.3: Map showing the CAP sites for Hornsea Three in relation to the Scoping boundary.

## 6.2.5 Landowners

### *Identification of land interests*

- 6.2.5.1 To identify relevant land interests, Ørsted commissioned a Her Majesty's Land Registry (HMLR) Polygon Plus search within the 5 km wide scoping boundary. This was then extended and varied in certain areas where amendments were made or route options added.
- 6.2.5.2 Basic Land Interest Questionnaire (LIQ) forms were pre-populated from the HMLR information obtained and each landowner was visited with a form and associated land plan to complete for each parcel of land (Annex 7 to this Consultation Report, document reference number A5.1.7), to assess all land interests that may be associated with a specific parcel and to accurately record land ownership boundaries. Unregistered land interests were identified where possible by utilising public sources of information including Trace IQ, site visits, site noticing and discussions with neighbouring land interests.
- 6.2.5.3 New land interests were identified through contact referencing, basic LIQ form completion and correspondence with landowners. A basic title interrogation process extracted additional land interest details, which were then pre-populated on an LIQ form and sent to the respective land interests for confirmation. Some interests were added or removed following this process and landowner/interest feedback.

### *Landowner engagement*

- 6.2.5.4 Ørsted consulted extensively with landowners along the proposed Hornsea Three onshore cable corridor both formally during the statutory consultation periods under section 42 of the 2008 Act and informally to seek their feedback on the proposal as the preferred route emerged. Landowner knowledge and feedback was critical in shaping the final onshore cable corridor for Hornsea Three and this was demonstrated by the number of route iterations, which led to two additional rounds of statutory consultation. This is further detailed in the Environmental Statement, volume 4, Annex 4.3: Refinement of the Onshore Cable Corridor and Associated Infrastructure (Stages 5-7 Scoping to PEIR) (document reference number A6.4.4.3) and Annex 4.4: Post PEIR Changes (Stages 8-9) (document reference number A6.4.4.4).
- 6.2.5.5 Ørsted initially contacted landowners in July 2016 to introduce Hornsea Three and to notify them of the Phase 1 Surveys. Landowners were contacted again in November 2016 at the start of the Phase 2 wintering bird surveys.
- 6.2.5.6 Prior to formal consultation under Section 42, Ørsted informally consulted landowners on the proposed 200-metre-wide onshore cable corridor between December 2016 and June 2017. Landowners were also invited to both rounds of community consultation events under Phase 1 where the Site and Land Rights Manager and appointed land agents, Dalcour Maclaren, were available to answer questions.

6.2.5.7 Informal consultation with landowners continued throughout the consultation period. This consisted of individual letters, quarterly newsletters with project updates, phone calls, emails and face-to-face meetings to log and record feedback to help further refine the project proposals. Individual meetings were offered to all landowners along the proposed cable corridor and in total, Dalcour Maclaren attended over 100 such meetings.

6.2.5.8 All landowner engagement including engagement and discussions with agents appointed to act on behalf of land interests was recorded and feedback was captured on individual feedback forms then logged on a central database. A copy of the feedback form is provided in Annex 7 of this Consultation Report (document reference number A5.1.7). Dalcour Maclaren, on behalf of Ørsted, provided feedback where possible, in face-to-face meetings and in writing or by phone, including general updates and individual responses where possible.

6.2.5.9 In November 2017, in response to common landowner questions, Ørsted updated the Hornsea Three FAQs on the Hornsea Three website to include a landowner specific section. Landowners were directed to the FAQs via the community newsletters, which were issued to all landowners and land interests along the proposed Hornsea Three onshore cable corridor.

6.2.5.10 Ørsted has attempted to reach voluntary agreements with landowners in relation to Hornsea Three. Negotiations are underway and ongoing, and Ørsted will continue to engage landowners to try to seek reach agreements even after the DCO is submitted. An overview of all negotiations to date is provided in the Statement of Reasons as an Appendix (document reference number A4.2).

### *Wider engagement*

6.2.5.11 Ørsted engaged informally and later formally (under section 42 of the 2008 Act), with a number of bodies who represent landowner interests across Norfolk including the Country, Land and Business Association (CLA), National Farmers Union (NFU), Norfolk Association of Agricultural Valuers (NAAV) and land agents. to further inform the consultation responses. Informal consultation on Hornsea Three with land interests is ongoing.

6.2.5.12 Ørsted participated in briefing and question and answer (Q&A) sessions with the bodies listed above to respond to general landowner queries. These sessions were useful in terms of gathering general feedback and landowner concerns across the whole route. Table 6.1 provides an overview of the meetings held to date.

Table 6.1: List of meetings held with landowner representatives.

Date	Group	Focus of meeting
04/11/2016	NFU	Introduction to Hornsea Three and consultation process.
27/03/2017	NFU and NFU member landowners	Introduction to proposed terms for voluntary landowner agreement and update on Hornsea Three.
29/11/2017	NFU	Update and discussion regarding terms for voluntary landowner agreements. Discussed Further Statutory Consultation (Phase 2.B).
30/11/2017	CLA, NFU and Land Agents	Update and discussion regarding terms for voluntary landowner agreements. Discussed Further Statutory Consultation (Phase 2.B).
09/03/2018	Land Agents, NFU and CLA	Further discussion of terms for voluntary landowner agreements.

## 6.2.6 Parish Councils and local representatives

- 6.2.6.1 Ørsted held a series of briefing and Q&A sessions with the relevant Parish Councils and local representatives including the district and county councillors during the consultation period, to provide an update on how the plans were progressing and to respond to questions about the proposal to help inform their responses and assist local understanding. An overview of the engagement is provided in Table 6.2. Ørsted also attended several individual Parish Council meetings on request to discuss specific issues.
- 6.2.6.2 These sessions were also an opportunity to gather feedback informally on the proposal, to identify areas of concern and to respond to general questions on the application and consultation process more generally.
- 6.2.6.3 The parishes were grouped by local authority (see Table 6.3). This enabled Ørsted to focus the discussions of most relevance to that area and to ensure that all Parish Councils received consistent information at the same time. These sessions were an opportunity for local representatives to ask questions on behalf of their parishioners to help inform their responses to the consultation and to distribute information on Hornsea Three and the consultation more widely.
- 6.2.6.4 The sessions were attended by Ørsted representatives with different parts of the project team with different specialisms to ensure as many questions could be responded to on the day as possible. Where it was not possible to respond to questions on the day, these were taken away and responses were provided in the meeting minutes that were circulated to invitees afterward.
- 6.2.6.5 After the meetings, the meeting minutes and presentations were shared with the Parish Councils to circulate more widely to their parishioners to keep them informed. These sessions were also an opportunity to gather feedback informally from Parish Councils during the statutory consultation periods, particularly where the Parish Council may not have intended to submit a formal response.

Table 6.2: Parish Council meetings held to date.

Date	Group	Focus of meeting
19/04/2017	North Norfolk Parish Councils	Project update following Phase 1.B Consultation
28/04/2017	Broadland Parish Councils	Project update following Phase 1.B Consultation
08/05/2017	South Norfolk Parish Councils	Project update following Phase 1.B Consultation
25/05/2017	Edgefield Parish Council	Meeting regarding onshore HVAC booster station
08/08/2017	North Norfolk Parish Councils	Project update and Statutory Consultation on PEIR
09/08/2017	South Norfolk Parish Councils	Project update and Statutory Consultation on PEIR
10/08/2017	Broadland Parish Councils	Project update and Statutory Consultation on PEIR
05/12/2017	Broadland Parish Councils	Update following PEIR and Further Statutory Consultation
06/12/2017	South Norfolk Parish Councils	Update following PEIR and Further Statutory Consultation
13/12/2017	North Norfolk Parish Councils	Update following PEIR and Further Statutory Consultation
13/12/2017	Swardeston Parish Council	Meeting regarding onshore HVDC converter/HVAC substation
06/03/2018	Oulton Parish Council	Meeting regarding Main Construction Compound
12/03/2018	South Norfolk Parish Councils	Project update, Focussed Statutory Consultation and Examination
13/03/2018	Broadland Parish Councils	Project update, Focussed Statutory Consultation and Examination
20/03/2018	North Norfolk Parish Councils	Project update, Focussed Statutory Consultation and Examination

Table 6.3: List of parishes in each local authority invited to meetings.

Local Authority	Parish Councils
North Norfolk	Weybourne Kelling High Kelling Bodham Baconsthorpe Hempstead Edgefield Plumstead Little Barningham Corpusty and Saxthorpe
Broadland	Wood Dalling Heydon Oulton Salle Cawston Reepham Booton Swannington with Alderford and Little Witchingham Morton on the Hill Attlebridge Weston Longville Ringland Honingham
South Norfolk	Marlingford and Colton Easton Great Melton Bawburgh Little Melton Hethersett Keswick and Intwood East Carleton and Ketteringham Swardeston Stoke Holy Cross Mulbarton Swainsthorpe Caister St. Edmund

## 6.2.7 Commercial fisheries

- 6.2.7.1 Ørsted engaged with various UK and European Commercial Fisheries stakeholders to gather information to help establish the baseline for the environmental assessment and to seek their feedback on the proposal. Feedback was also gathered at the various commercial discussions that took place in advance of survey work taking place, particularly in relation to the potential impact on inshore activities, and at various community consultation events.
- 6.2.7.2 In advance of all Hornsea Three surveys which have been undertaken to date, Ørsted sent out information in the form of notices to mariners and fishermen, including plans explaining when and where upcoming surveys were due to take place. Ørsted engaged in discussion with local fisheries bodies around clearance requirements and how the surveys could be carried out to accommodate their activities and minimise disruption, this included breaking up the survey area, so that parts could still be accessed while works were taking place in another section.
- 6.2.7.3 Consultation was carried out at an industry level with national associations including the National Federation of Fishermen's Organisations (NFFO) in the UK and VisNed, representing Dutch interests. Ørsted also engaged with North Norfolk fishing associations including, the North Norfolk Fishermen's Association (NNFA), Wells and District Fishermen's Association (WDFa) and Norfolk Independent Fishermen's Association (NIFA).
- 6.2.7.4 A summary of the engagement with these organisations is provided in provided in Appendix D of Annex 6.1: Commercial Fisheries Technical Report (document reference number A6.5.6.1) of the Environmental Statement. A summary of the comments received relevant to Commercial Fisheries during the statutory consultation and how Ørsted has had regard to these in the final application is provided in section 9.3.6 of this Consultation Report.

## 7. Phase 1 Consultation

### 7.1.1 Summary

7.1.1.1 The publication of the Hornsea Three SoCC (DONG Energy, 2016b) marked the start of the first phase of consultation for Hornsea Three, hereafter referred to as Phase 1 Consultation. During Phase 1 Consultation, Ørsted published and received feedback on its Scoping Report (DONG Energy, 2016a) (outlined in section 4.3 of this Consultation Report) and held two rounds of community consultation events under section 47 of the 2008 Act (Phase 1.A and Phase 1.B).

## 7.2 Section 47 (Phase 1 Consultation)

### 7.2.1 Summary

7.2.1.1 Ørsted held its first round of community consultation events shortly after publishing its Scoping Report to allow stakeholders to have access to further information on Hornsea Three and to engage directly with the Hornsea Three team at a similar time. During the first round of community consultation, Ørsted introduced Hornsea Three, the infrastructure, the search area being considered and provided more information on the planning process, including the various assessments that would be undertaken as part of the EIA and how local communities would be consulted on the proposal, as set out in the Hornsea Three SoCC.

7.2.1.2 This was an opportunity to gather feedback on Hornsea Three early in the development process and critically, to ensure that interested parties understood how they could access information and engage in the process going forward. Attendees were able to view the early plans and were encouraged to consider the most important issues that should be considered by Ørsted when developing Hornsea Three and point out any features or areas of interest.

### 7.2.2 Consultation activities

#### *Scoping Report*

7.2.2.1 Ørsted published and consulted on the Hornsea Three Scoping Report with prescribed bodies through PINS during Phase 1 Consultation. The Scoping Report was an important document for the EIA and consultation more generally, as it introduced consultees to Hornsea Three and the proposed approach to the EIA, with the aim of ensuring a robust Environmental Statement was prepared as part of the DCO application.

7.2.2.2 The Scoping Report considered a number of environmental impacts, based on an understanding of the environmental conditions likely to be encountered within Hornsea Three, utilising information that had been collected within the former Hornsea Zone, the EIA for Hornsea Project One and Hornsea Project Two and other publicly available desktop data sources. It was noted that for several identified potential impacts, further data collection and assessment would be required to determine the significance of the effect.

7.2.2.3 In the Scoping Report and at the Phase 1.A community consultation events, a wide search area was presented, within which the permanent infrastructure for Hornsea Three would be sited. It was noted in the Scoping Report that the site selection for all elements of Hornsea Three was ongoing, therefore the exact locations of the offshore, intertidal and onshore infrastructure were undetermined at that stage and extensive consultation with relevant consultees (local authorities, statutory bodies, landowners, the local community and other interested groups) would be required before an application for Development Consent was submitted to PINS.

7.2.2.4 The consultation on the Scoping Report is detailed in section 4.3 of this Consultation Report. Responses received on the Scoping Report are captured in the Scoping Opinion produced by PINS (document reference number A6.4.5.5) and within the consultation tables in the Environmental Statement chapters (document reference number A6).

#### ***Phase 1.A community consultation events***

7.2.2.5 In October and November 2016, Ørsted held six community consultation events in locations across the Consultation Zone (as defined by the onshore cable corridor search area) (Table 7.1).

Table 7.1: Phase 1.A community consultation event timetable.

Date	Time	Venue
31/10/2016	3pm to 7pm	<b>Sheringham Community Centre</b> , Holway Road, Sheringham, NR26 8NP
02/11/2016	3pm to 7pm	<b>Aylsham Town Council</b> , Town Hall, Market Place, Aylsham, Norfolk, NR11 6EL
03/11/2016	3pm to 7pm	<b>The Green Britain Centre</b> , Turbine Way, Swaffham, Norfolk, PE37 7HT
07/11/2016	3pm to 7pm	<b>Great Yarmouth Town Hall</b> , Hall Plain, Great Yarmouth, Norfolk, NR30 2QF
08/11/2016	2pm to 5:30pm	<b>Harford Community Centre</b> , Harford Park, Peterkin Road Norwich, NR4 6LQ
09/11/2016	2pm to 6:30pm	<b>Blackfriars' Hall</b> , St Andrews Street, Norwich, NR3 1AU

7.2.2.6 For the Phase 1.A community consultation events, Ørsted held an event in each local authority area that was consulted on the draft SoCC. Venues were carefully selected based on their accessibility, in terms of access by public transport, parking facilities and wheelchair access. At that stage, Ørsted was considering a broad search area; however, as the Hornsea Three onshore cable corridor continued to be refined the locations selected to hold the consultation events were narrowed and focussed on the developing onshore cable corridor (see section 7.3 and section 8.3.3 of this Consultation Report).

7.2.2.7 The events were specifically held in the afternoon and early evening to encourage greater engagement across all demographics and to ensure that no group was excluded, for example those individuals that may have otherwise been restricted by standard working hours.

7.2.2.8 At these events, members of the public and other interested parties were able to view early information on Hornsea Three, as detailed in the Hornsea Three Scoping Report (DONG Energy, 2016a) including the proposed infrastructure and Hornsea Three onshore cable corridor search area, and to comment on the proposed development.

**Phase 1.A consultation materials**

7.2.2.9 Ørsted produced a variety of materials to inform the Phase 1.A Consultation. Table 7.2 provides a summary of the consultation materials available. These can be viewed in Annex 11 to this Consultation Report (document reference number A5.1.11).

7.2.2.10 The event materials were published on the Hornsea Three website on 27 October 2016, alongside the Hornsea Three Scoping Report and a deadline of 30 November 2016 was given for providing responses to the Phase 1.A Consultation.

7.2.2.11 Ørsted representatives with different backgrounds attended all community consultation events to answer any questions and discuss any concerns with individuals directly. This included members of the environmental consents team, site and land rights, commercial specialists, consultation representatives, the appointed Land Agent and the development manager. Ørsted fine-tuned this for the subsequent events under Phase 1.B and Phase 2.A to ensure that representatives were able to answer as many questions as possible. This included the addition of technical specialists, who were able to answer specific questions relating to the proposed infrastructure and construction methods.

Table 7.2: Phase 1.A consultation materials<sup>21</sup>.

Consultation Material	Description
Consultation Event Overview	This document provided an overview of the Phase 1.A Consultation. It introduced the developer (Ørsted), Hornsea Three, the planning process, the EIA and the areas being explored for location the infrastructure associated with Hornsea Three.
Exhibition Banners	Large exhibition banners were used to guide individuals around the event. Key project information was displayed, to be further informed by discussions with Ørsted representatives.
Consultation Plans	Foam boards showing the latest plans, as presented in the Hornsea Three Scoping Report (DONG Energy, 2016a) were displayed at the events and attendees were invited to comment directly on the boards, using pins and post-it notes to mark areas of interest or concern. These comments were considered by Ørsted as part of the early site selection process.
SoCC	Hard copies of the SoCC were made available at the events, providing more information on the consultation process, including how and where individuals could find more information on Hornsea Three and how to engage in the process.
Scoping Report	Hard copies of the Scoping Report were available at the events, providing background information on Hornsea Three and proposed approach to the EIA.
Newsletter (November 2016)	Hard copies of the community newsletter were available, providing an update on the latest activities and Hornsea Three contact details.
Children's entertainment	Entertainment was provided including themed arts and crafts, puzzles and the Oculus Rift device to encourage participation from a wider demographic; including parents with young children and young adults to attend the events. The Oculus Rift device offered an opportunity for interested parties to take a virtual tour of an offshore wind turbine and get a sense of the scale of the infrastructure.
Feedback Form	Feedback forms were available for individuals to complete based on the information presented at the events. The initial feedback form was short and simple to encourage as many individuals as possible to complete one. This was an opportunity to gather feedback on the project at the earliest stage, to identify key priorities for the project based on the feedback received and to assess the level of understanding in terms of the planning process. Attendees were invited to complete a feedback form at the events or at a later stage but prior to the response deadline.  An electronic form was also available on the Hornsea Three website for those people unable to attend these event in person and contact details were provided should individuals have any questions on the materials presented.

<sup>21</sup> Materials associated with first round of community consultation events were initially labelled Phase 1, as it was not known at that stage that a second round of events would be held. Throughout this Consultation Report, the Phase 1 consultation activities are referred to as "Phase 1.A" to differentiate between the two rounds of consultation under Phase 1.

## 7.2.3 Publicity

7.2.3.1 The community consultation events were advertised through the SoCC, which was published in full in local and regional publications in October 2016 and in the community newsletter (November 2016), which was published on the Hornsea Three website and advertised in local publications in October 2016<sup>22</sup> (see Annex 11 of this Consultation Report, document reference number A5.1.11). Ørsted also issued a press release on the consultation and events, which received some coverage locally.

7.2.3.2 Hard copies of the newsletter and SoCC were distributed to the CAP sites, the relevant parish councils within the 5 km-wide search area, and a further 5 km-wide buffer around this and council offices and posters were sent to event venues and parish councils to display. Ørsted also wrote to all landowners along the Hornsea Three onshore cable corridor directly advising them of the community consultation events.

## 7.2.4 Summary of responses

7.2.4.1 After the Phase 1.A community consultation events a Consultation Summary Report (DONG Energy, 2017a) was produced summarising all the feedback received during the first round of community consultation events. The purpose of this document was to provide individuals with a brief overview of what had been raised during the consultation events. It was hoped that by presenting a summary of the key themes and concerns raised, it would either reassure individuals that their concerns had been noted or would encourage others who may have felt that it did not reflect their concerns to continue to reach out to the project. The Phase 1 Consultation Summary Report was published on the Hornsea Three website and issued to individuals who had registered their interest in the project and to the local CAP sites and Parish Councils for wider distribution.

7.2.4.2 This Phase 1 (Phase 1.A) Consultation Summary Report covered some of the key questions raised at that early stage in the development process and set out the next steps for Hornsea Three. A summary of some of the common themes raised and how these were considered by Hornsea Three in the final application is provided in Table 7.3. A full summary of all responses received under Phase 1.A, including the Phase 1 (Phase 1.A) Consultation Summary Report can be found in Annex 13 (document reference number A5.1.13).

Table 7.3: Summary of Phase 1.A Consultation responses.

Summary of response	Regard to response
<b>Climate change and renewables</b>	
Several respondents noted the importance of climate change and expressed support for renewable energy sources to help reduce the UK's carbon emissions.	This was acknowledged by Ørsted.
<b>Project description</b>	
A number of respondents supported the proposal to bury the cables underground rather than using overhead pylons.	It was recognised by Ørsted from the onset that burying the cables would likely be preferable to overhead pylons and therefore Ørsted committed to burying the cables from the onset, despite the additional cost this would impose.
<b>Environmental impact</b>	
Several respondents raised concerns regarding the potential impact on the local environmental and wildlife, including the impact on designated sites, including Sites of Special Scientific Interest (SSSIs), the AONB and ancient woodland. Respondents encouraged Ørsted to consider this in the cable routing for Hornsea Three and to try to ensure that the natural environment is left in a better condition.	The environmental impacts associated with Hornsea Three has been assessed as part of the EIA. Consideration has been given to the potential impact on local ecology and this presented in volume 3, chapter 3: Ecology and Natural Conservation (document reference number A6.3.3) of the Environmental Statement and appropriate mitigation offered.
Respondents were concerns about the potential visual impact from Hornsea Three.	The potential for visual impacts have been assessed as part of the EIA and presented in volume 3, chapter 4: Landscape and Visual Resources (document reference A6.3.4) of the Environmental Statement. Ørsted has proposed landscaping for the onshore HVDC Converter/HVAC substation to reduce the potential impact on visual receptors, including residential properties. This is further detailed in section 9.4.4 of this Consultation Report.
<b>Onshore Cable Corridor</b>	
A number of individuals pointed out features they would like Ørsted to avoid, including ecological features, such as the Yare Valley within the Scoping Boundary when routing the cable corridor.	The onshore cable corridor for Hornsea Three has been carefully routed to avoid sites of ecological importance where possible. Where this is not possible Ørsted has committed to Horizontal Direction Drill (HDD) underneath. Further information is provided in sections 9.2.2 and 9.4.3 of this Consultation Report.
<b>Onshore HVDC converter/ HVAC substation</b>	
Concerns were noted about potential noise generated from the onshore HVDC converter/HVAC substation.	The potential for noise to be generated by the onshore substation has been assessed as part of the EIA and is presented in the Environmental Statement, volume 3, chapter 8: Noise and Vibration (document reference number A6.3.8). In-built mitigation measures have been proposed to reduce the any potential noise generated by the onshore HVDC converter/HVAC substation to an acceptable level.

<sup>22</sup> This included the Eastern Daily Press, North Norfolk News, and Diss, Wymondham and Attleborough Mercury.

Summary of response	Regard to response
Respondents noted concerns regarding the location of the proposed onshore substation and the potential for it to be visually intrusive. It was highlighted that the rural area close to Norwich is meant to be protected from visually unattractive developments.	As part of the EIA for Hornsea Three, a Landscape and Visual Impact Assessment (LVIA) was undertaken and this is presented in volume 3, chapter 4: Landscape and Visual Resources (document reference number A6.3.4) of the Environmental Statement.  This includes proposed mitigation measures to reduce the potential impact on Undeveloped Approach to Norwich and Norwich Southern Bypass Landscaping Protection Zone (NSBLPZ), which is part of local planning policy and residential properties. Further information is provided in section 9.4.4 to this Consultation Report.
<b>Construction works</b>	
Respondents highlighted the importance of minimising the amount and duration of disruption locally as a result of the cable-laying and considering the impact on farming communities.	In response to feedback (raised during latter consultations), Ørsted has reduced the maximum number of phases that Hornsea Three could be build out in. This is further detailed in section 9.2.1 of this Consultation Report.  Ørsted has sought to take on board landowner feedback to minimise the potential impact on farming activities. This includes sensitive routing of the onshore cable corridor (i.e. following fields boundaries where possible) and increasing the minimum burial depth, to enable farmers to use continue their standard operations.
Several individuals raised concerns regarding the impact on traffic and transport during the construction of Hornsea Three and the suitability of the local road network, specifically around Kelling and Weybourne.	Ørsted recognises that the potential impact of construction vehicles on traffic levels and road safety is a key concern for local communities. The potential impact from Hornsea Three on traffic and transport has been assessed and is detailed in volume 3, chapter 7: Traffic and Transport (document reference A6.3.7) of the Environmental Statement.
<b>Socioeconomics</b>	
Respondents noted that Ørsted should consider benefits to the local community and noted the importance of job creation.	The potential for Hornsea Three to provide wider benefits, including jobs and opportunities for local businesses is assessed in volume 3, chapter 10: Socioeconomics (document reference A6.3.10) of the Environmental Statement.
Respondents also raised concerns regarding the potential impact on tourism and local businesses reliant on tourists particularly in the summer months.	Ørsted recognises that tourism is a key industry in Norfolk. Where possible, Ørsted has sought to reduce the potential impact on tourism receptors through the final routing of the cable corridor, to avoid interactions with local holiday parks and campsites where feasible and particularly where other potential technical or environmental issues are a factor.  Local disruption will be kept to a minimum through careful management of construction activities and as part of the DCO application, Ørsted has prepared an Outline Construction Traffic Management Plan (document reference number A8.2) and Outline Code of Construction Practice (OCoCP) (document reference number A8.5) which set the principles that must be adhered to during the construction works.

Summary of response	Regard to response
Respondents were interested in wider community benefits, including funds for local initiatives.	Ørsted noted that Hornsea Three has potential to provide significant benefits to the UK. It was noted that on other projects, Ørsted has also established voluntary community benefit funds (CBFs), managed by an independent not-for-profit grant-making organisation, that can provide a valuable contribution to the local area.
<b>Consultation</b>	
Respondents highlighted the importance of maintaining good communication with landowners, local communities and commercial fisheries, who may have concerns and keeping them informed throughout the development and construction of Hornsea Three.	Ørsted sought to keep stakeholders informed throughout the consultation, via the information channels detailed in section 6.2, at face-to-face meetings and events and through the distribution of consultation materials and newsletters.  Meetings were held with local commercial fisheries to seek their feedback on Hornsea Three and to discuss survey requirements. This is further detailed in section 6.2.7 of this Consultation Report.
Some respondents were disappointed with the scale of maps at the events and location and advertisements of the events.	In response to feedback received regarding the first round of community consultation events and further developments, Ørsted held an additional round of community consultation events in March 2017 (Phase 1.B). At these events, more detailed maps were provided to inform the consultation and additional advertisement channels were used to maximise local participation.
Respondents noted that Hornsea Three should be developed sensitively as some areas have already been affected by similar developments in the past and / or are subject to other proposed developments (including the Northern Distributor Route Western link and Norfolk Vanguard, which is being developed by Vattenfall).	This was acknowledged and through the consultation Ørsted has sought to capture lessons learnt, either at meetings with stakeholders, at the community consultation events or through discussions with landowners. Ørsted has considered other developments in finalising the Hornsea Three application. Furthermore, efforts have been made to coordinate with other developers to avoid confusion and consultation fatigue. Further details are provided in section 9.4.11 of this Consultation Report.
Respondent noted that Ørsted staff were helpful and knowledgeable at the community consultation events.	This was acknowledged by Ørsted.

## 7.2.5 Compliance with the SoCC

7.2.5.1 Ørsted has complied with the consultation requirements as set out in the SoCC under Phase 1. This included holding community consultation events at the dates and times detailed in the SoCC, making the Scoping Report available for public inspection and production of a Consultation Summary Report. Table 5.2 above summarises how Ørsted has complied with the commitments set out in the SoCC.

## 7.3 Section 47 (Phase 1.B Consultation)

### 7.3.1 Summary

7.3.1.1 Following feedback from the first round of community consultation events (Phase 1.A) and refinement of the Hornsea Three onshore cable corridor search area, Ørsted held a second round of community consultation events (Phase 1.B) ahead of the start of Phase 2 Consultation on the PEIR (see section 8 of this Consultation Report).

7.3.1.2 At the Phase 1.B events, Ørsted presented a refined Hornsea Three cable corridor search area and further information on the proposed location of the associated infrastructure, including the three locations being considered at that time for the onshore HVAC booster station (if required) and areas within the original search area for the onshore HVDC converter/HVAC substation that had been identified as being least constrained.

7.3.1.3 These events were an opportunity for interested parties to influence the proposal before formal consultation was carried out under Phase 2. Consultees were asked to consider the refined search areas and highlight any areas Ørsted should consider in further refining the proposal.

### 7.3.2 Consultation activities

#### *Phase 1.B community consultation events*

7.3.2.1 Under Phase 1.B, Ørsted held seven community consultation events at locations in and near to the refined onshore cable corridor search area between 2 March 2017 and 10 March 2017 (see Table 7.4). At these events, members of the public and other interested parties were able to view the refined proposal and had the opportunity to complete a feedback form and comment on the proposed plans.

Table 7.4: Phase 1.B community consultation event timetable.

Date	Time	Venue
02/03/2017	1:30pm to 5:30pm	Reepham Town Hall, Church Street, Reepham, Norwich, NR10 4JW
03/03/2017	3pm to 7pm	Weybourne Village Hall, Beach Lane, Weybourne, Holt, NR25 7AH
06/03/2017	1pm to 5pm	The King's Centre, King Street, Norwich, NR1 1PH
07/03/2017	3pm to 7pm	Hall for All, Church Street, Weston Longville, Norwich, NR9 5JU
08/03/2017	3pm to 7pm	Corpusty and Saxthorpe Village Hall, Heydon Road, Corpusty, NR11 6QQ
09/03/2017	4pm to 8pm	Holt Community Centre, Kerridge Way, Holt, Norfolk, NR25 6DN
10/03/2017	2pm – 6pm	Swardeston Social Club and Village Hall, The Common, Swardeston, Norwich, NR14 8DX

<sup>23</sup> Ørsted placed adverts for the Phase 1.B community consultation events in the Eastern Daily Press, Norwich Evening News, North Norfolk News, Diss, Wymondham and Attleborough Mercury and in the number of local journals including the Reepham Life.

7.3.2.2 The venues were carefully selected by Ørsted in discussion with the local authorities to maximise the ability for all members of the local community interested in Hornsea Three to attend and to reflect refinements made to the cable corridor and feedback received. This included selecting suitable venues that were as close to the refined cable corridor as possible and venues in Norwich and Holt, with good public transport links. Norwich was retained as an event location, as although this location was not directly along the route, it provided an opportunity for those working in/adjacent to Norwich city centre to drop in at lunch or after work. Further detail on Ørsted's engagement with the local authorities is provided in Annex 2 to this Consultation Report (document reference number A5.1.2).

#### *Phase 1.B Consultation materials*

7.3.2.3 Ørsted produced a variety of materials to inform the Phase 1.B Consultation. Table 7.5 provides a summary of the consultation materials available. These can be viewed in Annex 12 to this Consultation Report (document reference number A5.1.12).

7.3.2.4 The Consultation Event Overview was uploaded to the Hornsea Three website on 22 February 2017, alongside the Hornsea Three Scoping Report (DONG Energy, 2016a). An electronic version of the Feedback Form was also available online, for individuals unable to attend the events in person.

### 7.3.3 Publicity

7.3.3.1 Ørsted publicised the Phase 1.B community consultation events on the Hornsea Three website ([www.hornseaproject3.co.uk](http://www.hornseaproject3.co.uk)), in the January 2017 community newsletter, in local publications<sup>23</sup> and through distributing information to the Parish Councils. Posters advertising the events were displayed in locations along the Hornsea Three onshore cable corridor and letters regarding the events were sent to all landowners within the proposed Hornsea Three onshore cable corridor.

7.3.3.2 To increase awareness and to reach a different portion of the community, Ørsted commissioned a geographically targeted social media campaign advertising the consultation and events. A company press release was issued and this was subsequently followed by a number of interviews with local media.

7.3.3.3 In response to concerns raised by several residents that local communities may not have been fully aware of the proposal to build an onshore HVAC booster station (if required) in north Norfolk, Ørsted issued a tailored "Note to residents" to those residents in the vicinity of the onshore HVAC booster station, to ensure that people were aware of what was being proposed and had the opportunity to participate in the consultation. This was also an opportunity to ensure that any inaccuracies in terms of local understanding were corrected to avoid any confusion. Any comments received regarding the onshore HVAC booster station after the formal deadline were also considered, as it was acknowledged that people may not have been fully aware of the consultation in time to participate.

7.3.3.4 Details of all the publicity for the Phase 1.B community consultation events is provided in Annex 12 (document reference number A5.1.12) to this Consultation Report.

**Table 7.5: Phase 1.B consultation materials.**

Consultation Material	Description
Consultation Event Overview	This document provided an overview of the Phase 1.A Consultation. It introduced the developer (Ørsted), Hornsea Three, the planning process, the EIA and the areas being explored for location the infrastructure associated with Hornsea Three.
Exhibition Banners	Large exhibition banners were used to guide individuals around the event. Key project information was displayed, to be further informed by discussions with Ørsted representatives.
Consultation Plans	Foam boards showing the latest plans, as presented in the Hornsea Three Scoping Report (DONG Energy, 2016a) were displayed at the events and attendees were invited to comment directly on the boards, using pins and post-it notes to mark areas of interest or concern. These comments were considered by Ørsted as part of the early site selection process.
SoCC	Hard copies of the Hornsea Three SoCC (DONG Energy, 2016b) were made available at the events, providing more information on the consultation process, including how and where individuals could find more information on Hornsea Three and how to engage in the process.
Scoping Report	Hard copies of the Scoping Report were available at the events, providing background information on Hornsea Three and proposed approach to the EIA.
Newsletter (November 2016 and January 2017)	Hard copies of the community newsletter were available, providing an update on the latest activities and Hornsea Three contact details.
Children's entertainment	Entertainment was provided including themed arts and crafts and the Oculus Rift device to encourage parents with young children and young adults to attend the events. The Oculus Rift device offered an opportunity for interest parties to take a virtual tour of an offshore wind turbine and get a sense of the scale of the infrastructure.
Feedback Form	Feedback forms were available for individuals to complete based on the information presented at the events. The initial feedback form was short and simple to encourage as many individuals as possible to complete one. This was an opportunity to gather feedback on the project at the earliest stage, to identify key priorities for the project based on the feedback receive and to assess the level of understanding in terms of the planning process. Attendees were invited to complete a feedback form at the events or at a later stage but prior to the response deadline.  An electronic form was also available on the Hornsea Three website for those people unable to attend these event in person and contact details were provided should individuals have any questions on the materials presented.

## 7.3.4 Summary of responses

7.3.4.1 After the Phase 1.B community consultation events a second Consultation Summary Report was produced on all the feedback received during the second round of community consultation events (see Annex 13 to this Consultation Report, document reference number A5.1.13). The Phase 1.B Consultation Summary Report was published on the Hornsea Three website and issued to everyone who had registered their interest and to the local CAP sites and Parish Councils for wider distribution.

7.3.4.2 The Phase 1.B Consultation Summary Report covered some of the key questions raised at this early stage in the development process and set out the next steps for Hornsea Three. A summary of some of the key themes raised in the first round of consultation and how these were considered within the final application is provided in Table 7.6, including how Ørsted has had regard to these in the final application Table 7.3. A full summary of all responses received under Phase 1.B, including the Consultation Summary Report can be found in Annex 13 of this Consultation Report (document reference number A5.1.13).

**Table 7.6: Summary of Phase 1.B consultation responses.**

Summary of response	Regard to response
<b>Offshore</b>	
In response to offshore proposals, respondents were concerned about the potential impact of offshore works including the installation of offshore components and movement of vessels to and from the site; (1) marine mammals (2) other marine users, including commercial fisheries and recreational boats.	<ul style="list-style-type: none"> <li>The impact on marine mammals has been assessed and is presented in volume 2, chapter 4: Marine Mammals (document reference number A6.2.4) of the Environmental Statement.</li> <li>The impact on marine users is assessed in volume 2, chapter 7: Shipping and Navigation (document reference number A6.2.7) and volume 2, chapter 11: Infrastructure of other users (document reference number A6.2.11) of the Environmental Statement.</li> </ul>
In the nearshore, respondents expressed concerns regarding the potential impact of installing the offshore export cables on the Cromer Chalk Reef and the associated MCZ.	Following the Phase 1.B Consultation, Ørsted identified an alternative offshore cable corridor in the near shore that would avoid the Cromer Chalk Reef. This alternative cable corridor was consulted on during Phase 2 consultation and was subsequently taken forward. More information is provided in section 9.2.2 of this Consultation Report.
<b>Hornsea Three intertidal area</b>	
At the Hornsea Three intertidal area, respondents were concerned about the potential impact the development may have on the cliffs, in relation to nesting bird and on the coastal footpath, frequently used by residents and tourists to the area.  Attendees highlighted the importance of tourism as one of the main sources of income in the area and asked Ørsted to take this into consideration where possible when planning any works.	Ørsted recognises the importance of the Norfolk Coastal Path and in finalising the design for Hornsea Three has incorporated a footpath diversion in the vicinity of the Hornsea Three intertidal area compound, should the cables at the Hornsea Three intertidal area be installed using open cut trenching.  It is also noted by Ørsted that tourism is an important industry in Norfolk. The impact on tourism receptors is assessed in volume 3, chapter 10: Socio-economics (document reference number A6.3.10) of the Environmental Statement.

Summary of response	Regard to response
Respondents were concerned about the effect on traffic during the construction and access to the beach, particularly during summer months. Respondents were keen to point out that the area had already been subject to similar works for other wind farm projects and that the road infrastructure is not suited to frequent lorry movement.	In finalising the design for Hornsea Three, Ørsted has moved the construction works further from the Weybourne village. The intertidal zone has been significantly refined, with the western route being selected (see section 9.2.2.10 of this Consultation Report). Ørsted is not seeking to use the Beach car park or Beach Lane, which was a serious concern for residents and will seek to manage traffic through a Construction Traffic Management Plan, and Outline of which accompanies the DCO application (document reference number A8.2)
In regard to the Landfall Zone, a number of respondents registered objections to use of the area to the east of Weybourne, noting its proximity to Pine Walk and residential properties. Individuals expressed concerns regarding the potential for local disruption while the works are underway.	In finalising the design for Hornsea Three, Ørsted has routed the cables to the west of Weybourne which will reduce the impact on Weybourne and the residents of Pine Walk.
<b>Onshore Cable Corridor</b>	
In response to the indicative Hornsea Three onshore cable corridor, attendees expressed concerns regarding the potential impact of installing the export cable on the environment and wildlife. Several respondents were particularly concerned about the potential impact on the River Glaven and noted that White Clawed Crayfish are present in this river.	Following the Phase 1.B consultation, Ørsted dropped Options A and B for the onshore HVAC booster station taking forward the Option C, which avoided the River Glaven. The final Hornsea Three onshore cable corridor has been carefully routed to avoid designated sites where possible to minimise the impact on the local environment and wildlife. Where it is not possible to avoid sites, Ørsted intend to HDD underneath these. This include using HDD to install the export cables under all major watercourses where White Clawed Crayfish are known to be present.
Other respondents were concerned about the proximity of the export cable to residential properties.	Ørsted has sought to route the export cable sensitively and through open countryside for the most part. Since the Phase 1.B consultation, Ørsted has reduced the Hornsea Three onshore cable corridor width from a 200 m-wide corridor (with a 100 m technical buffer either side) to an 80 m-wide corridor of which 60 m is required for the permanent easement. In many cases, this refinement has moved the Hornsea Three onshore cable corridor further away from residential properties.
During Phase 1.B consultation and informal consultation prior to that, landowners raised concerns regarding the proposed minimum burial depths for the onshore export cables.	In response to feedback, Ørsted extended the minimum burial depth for the onshore export cables to 1.2 m, which will enable farmers to continue to farm their land comfortably once the cables are installed.

Summary of response	Regard to response
<b>Onshore HVAC Booster Station</b>	
In response to the Phase 1.B consultation, Ørsted received a considerable amount of feedback on the three locations being considered for the onshore HVAC booster station (Figure 7.1). A large number of individuals from the local community expressed strong concerns about an onshore HVAC booster station being located at the site referred to locally as "Pond Hills" (Option A), explaining that this is valued by local communities and is renowned for its natural beauty and diverse wildlife. Others were concerned about the proximity of the "Holt Farm" site (Option B) to residential properties and expressed concerns about the potential effect that locating the onshore HVAC booster station at this site could have on the River Glaven.	Stakeholder feedback received both at and after the Phase 1.B community consultation events, was a strong determining factor in Ørsted's refinement of the onshore HVAC booster station options. Ahead of Phase 2 Consultation, all three options were weighed up considering a number of environmental, technical and commercial factors and subsequently, Options A and B were disregarded and Option C "Little Barningham" was taken forward in the PEIR. This decision was well received by the local community.
<b>Onshore HVDC converter/HVAC substation</b>	
In response to the onshore HVDC converter/HVAC substation heat map, respondents raised concerns regarding the potential proximity of the onshore HVDC converter/HVAC substation to residential properties and the potential for this to have a significant visual impact. Many respondents noted that it was difficult to envisage what the onshore HVDC converter/HVAC substation could look like and the scale of the infrastructure from the maximum dimension alone.	Ørsted recognised that it was important for stakeholders to understand what the onshore HVDC converter/HVAC substation could potentially look like to inform their response to the consultation. At the time of PEIR, a detailed Landscape and Visual Impact Assessment (LVIA) had not yet been undertaken and therefore, no photomontages or indicative designs were included in the PEIR. To help inform stakeholders responses, Ørsted commissioned a 3D model of Hornsea Three, including the onshore HVDC converter/HVAC substation, for the Phase 2 community consultation events. It was noted that no visual mitigation had been proposed at that stage. This is now included in the application and is further detailed in section 9.4.4 of this Consultation Report.
Others were concerned about the potential effect on noise levels.	Noise has been assessed as part of Environmental Statement, volume 3, chapter 8: Noise and Vibration (document reference number A6.3.8) and in-built measures have been proposed to reduce the effect to an appropriate level.
Attendees raised concerns regarding the potential impact on local hydrology, and particularly local water sources.	The impact on local hydrology, including at the onshore HVDC converter/HVAC substation site has been assessed in the Environmental Statement, volume 3, chapter 2: Hydrology and Flood Risk (document reference number A6.3.2).
In siting the onshore HVDC converter/HVAC substation, respondents requested that Ørsted try to avoid common land, including Dunston Common and the neighbouring woodland.	These areas have been avoided in the final siting of the onshore HVDC converter/HVAC substation. Further information can be found in the Environmental Statement, volume 1, chapter 4: Site Selection and Consideration of Alternatives (document reference number A6.1.4).

Summary of response	Regard to response
<b>Construction Compounds</b>	
When asked what they were most concerned about in relation to siting the temporary construction compounds, respondents replied that they were concerned about the potential impact on traffic and the potential for construction vehicles to cause damage to the existing road infrastructure. In their responses and on the plans, respondents noted roads where there are weight restrictions or narrow single-track lanes, which could restrict the movement of Heavy Goods Vehicles (HGVs).	Ørsted considered this feedback and four sites being considered for the main construction compound were presented in the PEIR and statutory consultation plans as part of the Phase 2 Consultation for further consideration.  Traffic for Hornsea Three will be managed through a Construction Traffic Management Plan, an Outline of which accompanies the DCO application (document reference number A8.2). Furthermore, steps will be taken to ensure there is no lasting impact on the condition of local roads, this includes visual condition surveys.
<b>Wider Issues</b>	
<b>Construction timings</b> Respondents were concerned about the timings of construction activities and disturbance to local wildlife, particularly during Spring, whilst others were concerned about the potential impact on tourism during the summer months, specially access to the beach at Weybourne.	Ørsted is applying for the rights to work all year round, however this will be managed sensitively, for example if hedgerows do need to be removed, this will be done outside of the nesting window.  Prior to any works commencing, Ørsted will also need to discuss and agree the CoCP with the local authorities, an Outline of which is provided as part of the DCO application (document reference number A8.5).
<b>Electromagnetic Fields (EMFs)</b> A number of respondents expressed concerns regarding potential affects from EMFs from the Hornsea Three cables and electrical infrastructure.	Following the Phase 1.B community consultation events, an EMF Compliance Statement for Hornsea Three was prepared and published as part of the PEIR. This document included a summary of relevant research and calculations showing that Hornsea Three would be compliant for national health guidelines in terms of EMF exposure.  Recognising that this was a key concern and area where there could be a lack of understanding, Ørsted arrange for independent EMF advisors to be present at the Phase 2 community consultation events, to answer questions specifically on EMFs.  Ørsted also prepared a high-level FAQ document on EMFs specifically that was referred individuals to the EMF Compliance document. The EMF Compliance Statement can be viewed in the Environmental Statement, volume 4, annex 3.3: EMF Compliance Statement (document reference number A6.4.3.3).

Summary of response	Regard to response
<b>Consultation Process</b>  <b>Plans</b> – A number of respondents noted that they would like more access to detailed maps, particularly near to the intertidal zone.  <b>Onshore HVAC Booster Station</b> – A number of individuals raised concerns that not all members of the community were aware of the plans for an onshore HAC booster station as part of the Hornsea Three application and therefore may not respond to the consultation.  <b>Technical information</b> – Many people request more technical information on the proposal to inform their response.	<b>Plans</b> – In response to feedback, Ørsted uploaded higher resolution versions of the plans to the Hornsea Three website. Ørsted also updated the Interactive Map and brought printed copies of the detailed statutory plans to the Phase 2 community consultation events.  <b>Onshore HVAC Booster Station</b> – In response to concerns, and to ensure accurate information was provided, Ørsted issued a note to residents in the vicinity of the onshore HVAC booster station options at that stage. Comments on the onshore HVAC booster station that arrived after the Phase 1.B deadline were also considered to ensure that everyone had a chance to have their say.  <b>Technical Information</b> – It was noted that that stage, precise details of the proposed works were not available; however more information would be included initially in the PEIR in draft format and then subsequently in the Environmental Statement. Respondents were informed about the next steps, including more information on how they could view and comment on the PIER. Ørsted also invited technical experts to attend the Parish Council meetings in August 2017 and the Phase 2 community consultation events (detailed in section 8.3.3).

### 7.3.5 Compliance with the SoCC

- 7.3.5.1 Ørsted has complied with the consultation requirements as set out in the SoCC under Phase 1. Ørsted held an additional round of events under Phase that had not been committed in the SoCC. This additional round of consultation was in line with the methodology outlined in the SoCC for consistency and to avoid confusion. Ørsted also refined its approach to consultation to reflect refinement of the onshore search area and feedback from stakeholders on the approach to consultation. Table 5.2 above summarises how Ørsted has complied with the commitments as set out in the SoCC.



Figure 7.1: Map showing the three proposed locations for the HVAC booster station as presented at the Phase 1.B events.

## 8. Phase 2 Consultation

### 8.1 Summary

8.1.1.1 Publication of the PEIR marked the start of the second phase of consultation for Hornsea Three (Phase 2 Consultation). During Phase 2 Consultation, Hornsea Three carried out statutory consultation under section 42 of the 2008 Act on the contents of the PEIR, hereafter referred to as “Statutory Consultation” (Phase 2.A). This coincided with a third round of community consultation events (Phase 2) under section 47 and consultation with the public under section 48. A Statutory Consultation Plan accompanied the PEIR, which presented a number of alternative routes and compounds being considered (Figure 8.2).

8.1.1.2 In response to feedback from the first round of statutory consultation and ongoing design development, a second round of statutory consultation under section 42 was undertaken, hereafter referred to as “Further Statutory Consultation” on additional locations outside of the previous consultation boundary. Consultation under section 47, in the form of a document issued to local communities and consultation under section 48 of the 2008 Act ran in parallel.

8.1.1.3 A third and final round of statutory consultation was undertaken in March 2017 in response to feedback from the “Further Statutory Consultation”, hereafter referred to as “Focussed Statutory Consultation”. To avoid confusion, the three rounds of statutory consultation undertaken as part of the Phase 2 Consultation have been labelled Phase 2.A, Phase 2.B and Phase 2.C respectively within this Consultation Report.

### 8.2 Preliminary Environmental Information Report

8.2.1.1 The EIA Regulations require PEI to be provided for public consultation by those seeking a DCO for a NSIP. The level of detail required in PEI is not defined by the EIA regulations; however, it must include the same categories of information as that being assessed by the Environmental Statement (in accordance with PINS Advice Note Seven: Preliminary Environmental Information, Screening and Scoping (PINS, 2015a)), which will accompany the application for a DCO.

8.2.1.2 This PEIR is intended to allow those taking part in the consultation to understand the nature, scale, location and likely significant environmental effects of Hornsea Three, such that they can make an informed contribution to the process of pre-application consultation under the 2008 Act and to the EIA process. It was noted that the PEIR contained preliminary information. As part of the pre-application consultation, Ørsted actively sought feedback on the PEIR from statutory consultees, local communities and interested parties.

8.2.1.3 In response to comments received as part of the Phase 2 Consultation, Ørsted further refined the Hornsea Three project proposal, in terms of the DCO application being submitted. The conclusions of the EIA are presented in the Environmental Statement (document reference number A6), which is submitted alongside the DCO supplication and a summary of all the consultation responses received is presented in section 0 of this Consultation Report.

## 8.3 Statutory Consultation (Phase 2.A)

### 8.3.1 Summary

8.3.1.1 Ørsted undertook Statutory Consultation (Phase 2.A) under section 42 of the 2008 Act between 27 July 2017 and 20 September 2017. The Statutory Consultation (Phase 2.A) ran in parallel to consultation under sections 47 and 48 of the 2008 Act. This consultation sought feedback on the contents of the PEIR and statutory consultation plans, which included a number of alternative routes and compounds that were being considered, however had not yet been assessed. Consultees were asked to consider the refined export cable route search area and proposed locations for the onshore HVAC booster station and onshore HVDC converter/HVAC substation.

### 8.3.2 Section 42

#### Summary

8.3.2.1 This section sets out the actions undertaken by Ørsted to fulfil the statutory consultation requirements as set out by section 42 of the 2008 Act and the APFP Regulations 2009.

#### **Identifications of the Prescribed Bodies (Section 42(1)(a) Consultees)**

8.3.2.2 Under Regulation 9(1)(a) of the 2009 EIA Regulations, PINS notified the prescribed consultees for Hornsea Three, as identified by Schedule 1 of the APFP Regulations 2009. This list of consultees was issued to Ørsted alongside the Scoping Opinion in December 2016 and was used as the basis for statutory consultation under section 42 of the 2008 Act. A copy of the list of prescribed consultees is presented in Annex 3 of this Consultation Report (document reference number A5.1.3).

8.3.2.3 Prior to carrying out statutory consultation under section 42 of the 2008 Act, Ørsted carried out a review of the list of prescribed bodies provided by PINS, to check that all details were up to date at the time of issuing the notice. Where changes were required to the original list, this is detailed in Annex 3 of this Consultation Report by way of footnotes. For example, Cadent Gas Ltd, who was previously listed as National Grid Gas Distribution Ltd and certain individual parish councils that are now combined, for example Swannington with Alderford and Little Witchingham Parish Council. These changes were reflected in the final section 42 consultee list.

8.3.2.4 In addition to the prescribed bodies identified by PINS, Ørsted sought to identify other parties that could have an interest in Hornsea Three, including other potential statutory undertakers. A list of potential statutory undertakers/utilities using data provided by Atkins following a detailed utility search, desktop research, line search, land interest information, site information and experience on other proposals. Statutory undertakers/utilities that were believed to have possible interest in the area were contacted to determine their interest.

8.3.2.5 On 19 June 2017 requests were made in writing with these organisations to confirm their interests within the limits of the Hornsea Three scheme and the locations of any equipment and apparatus within the PEIR boundary with a supporting plan provided. Where requested, Geographic Information System (GIS) files showing the search area were provided. Prior to the statutory consultation under section 42, certain organisations listed by PINS in the Regulation 9 list, confirmed that they had no apparatus within the Hornsea Three boundary, for example Fulcrum Pipelines Limited. In these instances, and only where it was confirmed that they had no wider interests, Ørsted removed them from the section 42 consultee list (see Annex 3, document reference number A5.1.3).

8.3.2.6 On 4 August 2017, where responses had left uncertainty regarding the presence of assets in the vicinity of the Statutory Consultation boundary, or where no response had been received, a further request was made with those organisations based upon a 1 km buffer search area from the Statutory Consultation boundary. The results of these enquiries and research was mapped resulting in a plan of interests and relevant apparatus.

8.3.2.7 Those who confirmed apparatus or did not otherwise state that they did not have interests in the area were consulted with under the first two rounds of Statutory Consultation (Phase 2.A and Phase 2.B). A cautionary approach was applied to the Further Statutory Consultation (Phase 2.B) to ensure no interested parties were excluded where a formal section 42 response had not been received to confirm whether they had any interests affected or not. The Focussed Statutory Consultation (Phase 2.C) was limited to those asset owners relevant to the proposed minor amends to the onshore cable corridor.

#### **Local authorities (Section 42(1)(b) Consultees as outlined in section 43 of the 2008 Act)**

8.3.2.8 Local authorities were identified as section 42(1)(b) consultees in accordance with section 43 of the 2008 Act in respect of “the land” identified for the development of Hornsea Three as presented in the Hornsea Three Scoping Report (Ørsted, 2016). Table 8.1 lists the relevant local authorities for Hornsea Three by category. The local authorities in relation to the Hornsea Three Scoping Boundary are shown on Figure 8.1.

8.3.2.9 The onshore Scoping Boundary was subsequently refined prior to commencement of statutory consultation under section 42 of the 2008 Act; however, all local authorities identified initially by Ørsted and PINS were consulted through the first two rounds of statutory consultation (Phase 2.A and Phase 2.B). Only the B and C authorities were consulted as part of the third round of Focussed Statutory Consultation (Phase 2.C) on the minor amendments to the Hornsea Three onshore cable corridor (see 8.5 of this Consultation Report).

**Table 8.1: List of local authorities identified under section 43 of the 2008 Act.**

Authority	Category	Description
North Norfolk District Council	B	District Council in which the development is situated.
Broadland District Council	B	District Council in which the development is situated.
South Norfolk District Council	B	District Council in which the development is situated.
Norwich City Council	A	District Council which shares a boundary with B authority.
King's Lynn and West Norfolk Borough Council	A	District Council which shares a boundary with B authority.
Breckland District Council	A	District Council which shares a boundary with B authority.
Great Yarmouth Borough Council	A	District Council which shares a boundary with B authority.
The Broads National Park Authority	A	The Broads Authority which shares a boundary with B authority.
Waveney District Council	A	District Council which shares a boundary with B authority.
Mid Suffolk District Council	A	District Council which shares a boundary with B authority.
Forest Heath District Council <sup>24</sup>	A	District Council which shares a boundary with B authority
St Edmundsbury Borough Council <sup>14</sup>	A	District Council which shares a boundary with B authority
Norfolk County Council	C	Upper-tier county council in which the development is situated.
Lincolnshire County Council	D	Upper tier county council which shares a boundary with a host 'C' authority.
Suffolk County Council	D	Upper tier county council which shares a boundary with a host 'C' authority.
Cambridgeshire County Council	D	Upper tier county council which shares a boundary with a host 'C' authority.

**Identification of the relevant landowners and those with an interest in the land (Section 42(1)(d) Consultees as outlined in section 44)**

- 8.3.2.10 Under section 42(d) of the 2008 Act, the Applicant must consult with each person who is within one or more categories outlined in section 44 of the 2008 Act. Ørsted sought to identify the section 42(d) consultees by diligent inquiry before the statutory consultation. The process undertaken to identify relevant landowners and land interests is set out in section 6.2.5 of this Consultation Report.
- 8.3.2.11 Where owners, lessees, tenants or occupiers were unknown, Ørsted placed notices detailing the consultation at the relevant locations along the onshore cable corridor. These notices were installed on 26 and 27 July 2017 and were on display for a six-week period.

8.3.2.12 An example of the notice and a map showing the locations where the notices were placed can be viewed in Annex 7 of this Consultation Report. During the consultation period, the signs were checked on a weekly basis, with photographs taken on each visit. If a notice was damaged or missing it was replaced at the time.

8.3.2.13 All persons consulted with under section 42(d) are listed in the Book of Reference (document reference number A4.3), which is up to date at the time of submitting the application for a DCO. It is noted that the list of section 42(d) consultees is subject to change over time, as a result of changes in land ownership.

**Section 42 consultation activities**

8.3.2.14 Ørsted undertook statutory consultation on the PEIR in July 2017. The consultation commenced on 27 July 2017 and the deadline for responses was 20 September 2017, 56 days in total. To reduce confusion, Ørsted deliberately co-ordinated the deadline for responses to sections 42, 47 and 48 consultations under Phase 2 (subsequently referred to as Phase 2.A).

8.3.2.15 In accordance with section 46 of the 2008 Act, Ørsted notified PINS in writing on 26 July 2017 in advance of commencing consultation under section 42, of the intention to submit an application for a DCO for Hornsea Three and provided PINS with the consultation documents (Annex 8 of this Consultation Report, document reference number A5.1.8).

<sup>24</sup> Local authorities prescribed by PINS under Regulation 9(1)(a) of the 2009 EIA Regulations (as amended), however do not fall under section 43 of the 2008 Act, as share a boundary with a category A authority.

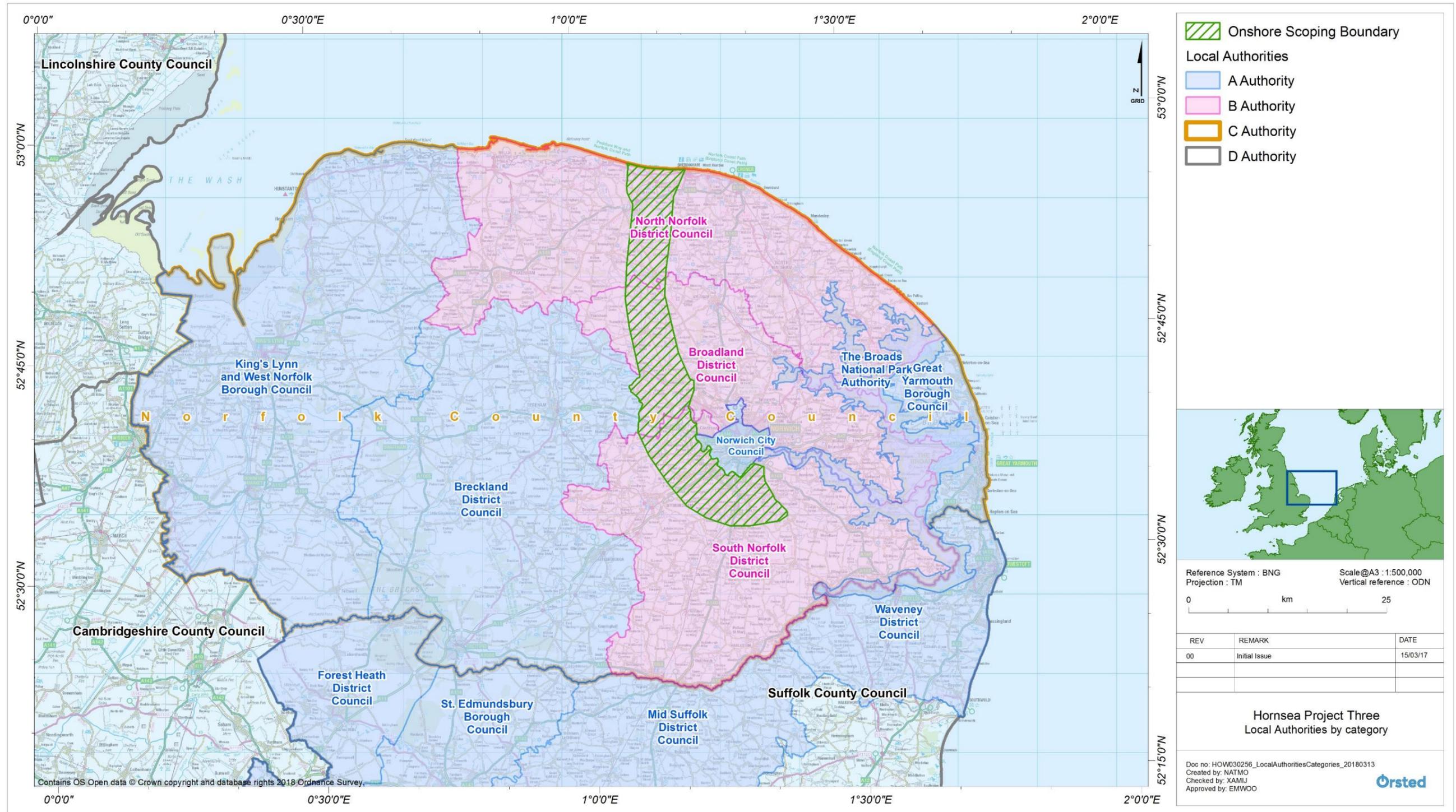


Figure 8.1: Plan showing the A to D authorities relevant to the Hornsea Three onshore Scoping Boundary.

8.3.2.16 All consultees identified under section 42 were formally notified of the commencement of statutory consultation under section 42 of the 2008 Act by letter on 25 July 2017. The written notification included:

- Hard copy of the Statutory Consultation Plans.
- Hard copy of notice publicised in accordance with section 48 of the 2008 Act (including details of the public consultation events and the locations where the consultation documents could be inspected free of charge).
- A USB card containing:
  - Phase 2 Statutory Consultation Plan/s;
  - Full PEIR including a Non-Technical Summary; Introductory Chapters (volume 1), Offshore chapters (volume 2), Onshore chapters (volume 3), Introductory Chapter Annex's (volume 4), Offshore Chapter Annex's (volume 5), onshore chapter Annex's (volume 6); and
  - Draft RIAA.

8.3.2.17 The Statutory Consultation Plan (Figure 8.2) also included a number of alternative routes and compounds being considered by Ørsted. At the time of publishing the PEIR, these alternatives had been identified, but had not been assessed in PEIR. Ørsted presented these alternatives on the consultation plans so that feedback could be sought on these.

8.3.2.18 A soft copy of the statutory consultation materials, including the full PEIR, was available on the Hornsea Three website from 27 July 2017. Section 42 consultees were also notified by email on 27 July 2017<sup>25</sup> (triggering the commencement of the consultation). This included a soft copy of the section 42 letter, a soft copy of the section 48 notice and a soft copy of the Overview and Onshore Statutory Consultation Plans. It was noted that more detailed plans could be viewed on the Hornsea Three website.

8.3.2.19 The deadline for responding to the section 42 consultation was 20 September 2017 (56 days in total), which is longer than the statutory minimum of 28 days, to reflect the volume and detail of the consultation materials.

8.3.2.20 Following issuing the section 42 notice, it was brought to Ørsted's attention that the USB cards provided as part of the consultation materials, omitted a number of files in error due to an issue with the data transfer process. In the interim the files were available to view/download from the Hornsea Three website. However, for completeness to ensure a fully informed consultation, Ørsted reissued new USB cards to supersede the previous one to all consultees on 2 August 2017 (Annex 6 of this Consultation Report, document reference number A5.1.6). This was before the second notice under section 48 of the 2008 Act (Table 8.4) and still allowed more than the statutory minimum (28 days) for consultation responses to be received.

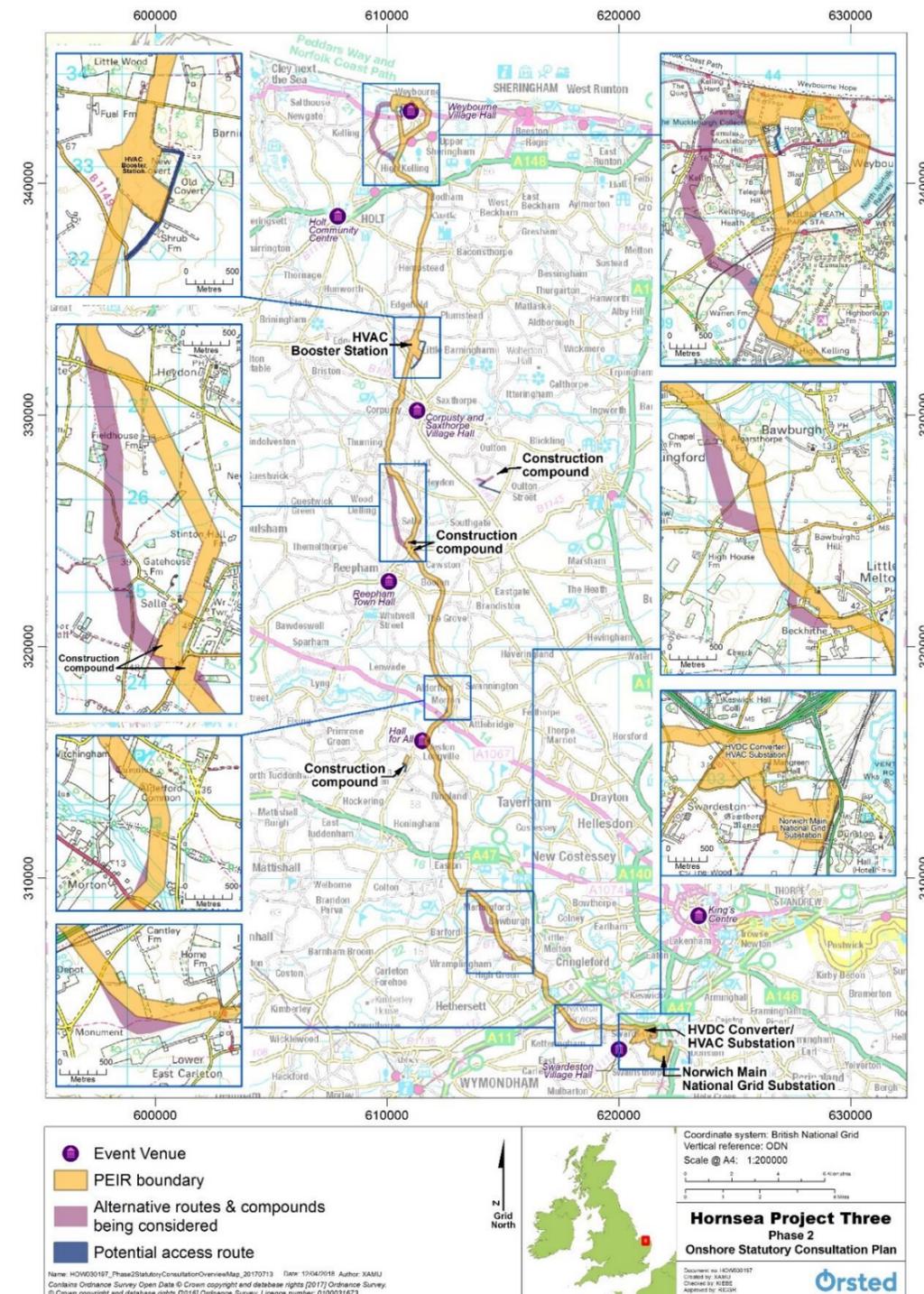


Figure 8.2: Phase 2 Statutory Consultation Plan (subsequently referred to Phase 2.A).

<sup>25</sup> For certain consultees only a postal or email had been identified. In these instances, this was assumed to be sufficient as it was noted in the email and letter that the consultation documents could be provided by other methods on request.

### 8.3.3 Section 47

#### Summary

8.3.3.1 This section sets out the actions undertaken to fulfil the consultation requirements under section 47 of the 2008 Act, as detailed in the Hornsea Three SoCC. Consultation under section 47 under Phase 2 ran in parallel to consultation under section 42 of the 2008 Act and the APFP Regulations 2009.

#### Consultation activities

8.3.3.2 As part of the Phase 2 Statutory Consultation, Ørsted published a tailored document detailing the public consultation on the Hornsea Three website and issued this to communities in close proximity to the proposed works (Annex 14 of this Consultation Report, document reference number A5.1.14) and held a series of community consultation events.

#### Statutory Consultation document

8.3.3.3 This document contained details of the consultation including; details of the proposed development, maps showing the proposed location for the works, details of where more information could be found and how to respond to the consultation.

8.3.3.4 This document was issued to local communities at the start of the consultation period by post to those properties within the newsletter distribution area and by either email or post to individuals who had registered their interest in the Project via the Hornsea Three website or information lines. A soft copy of the document was also issued to the relevant Parish Councils and hard copies were made available at the Hornsea Three CAP sites.

#### Phase 2 community consultation events

8.3.3.5 In parallel to formal consultation with statutory consultees on the contents of the PEIR under section 42 of the 2008 Act and in accordance with Regulation 11 of the 2009 EIA Regulations, Ørsted held a third round of community consultation events in locations across the Consultation Zone. At these events, Ørsted specifically consulted with stakeholders and the local community on the contents of the PEIR. The community consultation events were held from 4 to 13 September 2017 (Table 8.2).

8.3.3.6 Ørsted also participated in the “Greenbuild – Celebrating Norfolk” event which took place on the 9 and 10 September 2017. This was another opportunity to raise awareness locally in terms of Hornsea Three and the wider consultation. In total, the event attracted approximately 6,000 visitors from across Norfolk over the two days from different demographics, which provided another opportunity for local communities to engage in the consultation process.

8.3.3.7 As the main sponsor, Ørsted had a large stand near to the main marquee with lots of interactive activities for the whole family including 3D virtual imagery of the proposed wind farm. Ørsted also had two speaker slots over the weekend, where specialists from Ørsted presented information on Hornsea Three and the development of offshore wind as a whole and answered questions.

Table 8.2: Phase 2.A community consultation event timetable.

Date	Time	Venue
04/09/2017	3pm to 7pm	Swardeston Social Club and Village Hall, The Common, Swardeston, Norwich, NR14 8DX
05/09/2017	4pm to 7:30pm	The King's Centre, King Street, Norwich, NR1 1PH
06/09/2017	4pm to 8pm	Corpusty and Saxthorpe Village Hall, Heydon Road, Corpusty, NR11 6QQ
07/09/2017	3:30pm to 7:30pm	Weybourne Village Hall, Beach Lane, Weybourne, Holt, NR25 7AH
08/09/2017	3:30pm to 7:30pm	Reepham Town Hall, Church Street, Reepham, Norwich, NR10 4JW
12/09/2017	4pm to 7:30pm	Hall for All, Church Street, Weston Longville, Norwich, NR9 5JU
13/09/2017	4pm to 7:30pm	Holt Community Centre, Kerridge Way, Holt, Norfolk, NR25 6DN

#### Phase 2.A consultation materials

8.3.3.8 Ørsted produced a variety of materials to inform the Phase 2 Consultation (Phase 2.A). It was recognised that there was a significant volume of information contained within the PEIR for local communities to process, so additional steps were undertaken to make this information easier to interrogate. Table 8.3 provides a summary of the consultation materials available at the Phase 2 community consultation events. The materials can also be viewed in Annex 14 to this Consultation Report (document reference number A5.1.14).

Table 8.3: Phase 2 consultation materials.

Consultation Material	Description
Exhibition Banners	Exhibition banners were used to convey the key project information to the public. These banners were focussed around the key themes that had emerged from the previous rounds of consultation and direct responses we provided to some of the FAQs. The banners covered the overall project, the onshore cable corridor, including specific details regarding the cable trenches, the onshore HVAC booster station and onshore HVDC converter/HVAC substation, including indicative visualisations, information on the EIA process and construction phasing.
Consultation Plans	Foam boards presenting the Statutory Consultation plans were displayed at the events and attendees were invited to comment directly on the boards, using pins and post-it notes to mark areas of interest or concern as done previously. In response to concerns regarding access to detailed maps and plans for Hornsea Three, copies of detailed plans focussing in on specific areas of the route were available for attendees to take away with them.
PEIR and Non-Technical Summary	A hard copy of the full PEIR, including a Non-Technical Summary was available at the events. Ørsted representatives from the Environment and Consents team for Hornsea Three were available to explain the documents and answer questions on the preliminary environmental assessments.
EIA Fact sheets	A fact sheet was prepared on each EIA topic, providing information on the impact assessment, key consultees, current findings and proposed mitigation.

Consultation Material	Description
3D Webtech Tool	In response to feedback, Ørsted commissioned a 3-dimensional (3D) modelled simulation of the Hornsea Three cable corridor including offshore and onshore infrastructure. The model was based on high resolution aerial imagery and photographs taken from public views points near to the cable route to create a semi realistic world, into which the infrastructure and route could be superimposed. This included 3-dimensional images of the onshore HVAC booster station and onshore HVDC converter/HVAC substation based on the maximum design parameters. It was noted that these visualisations did not include any proposed mitigation (which would be developed and informed by the Landscape and Visual Impact Assessment (LVIA)) and were indicative only and subject to change following more detailed assessments.
EMF Advisors and Technical Specialists <sup>26</sup>	Ørsted organised for an independent specialist EMF advisor from National Grid to attend the consultation events following concerns raised regarding EMFs during the previous consultations. Technical specialists from Ørsted were also available to answer specific questions regarding the cables and installation methods.
Feedback Form	Feedback forms were available for individuals to complete based on the information presented at the events. In response to feedback that consultees would like more direction with the Feedback Form, a longer, more structure feedback form was prepared for the Statutory Consultation. Questions relating to each key infrastructure element were included, in addition to questions relating to both the EIA and consultation process itself.  Prepaid envelopes were provided for individuals who required further time to compose their response. Alternatively, an electronic version of the feedback form was available on the Hornsea Three website for those people unable to attend the events in person.
SoCC	Hard copies of the SoCC were made available at the events, providing more information on the consultation process, including how and where individuals could find more information on Hornsea Three and how to engage in the process.
Scoping Report	A hard copy of the Scoping Report was available on demand for reference purposes, providing background information on Hornsea Three and proposed approach to the EIA.
Newsletters	Hard copies of the previous community newsletters were available, providing an update on the latest activities.
Children's entertainment	Entertainment was provided including themed arts and crafts and the Oculus Rift device to encourage parents with young children and young adults to attend the events. The Oculus Rift device offered an opportunity for interest parties to take a virtual tour of an offshore wind turbine and get a sense of the scale of the infrastructure.

8.3.3.9 The consultation materials<sup>27</sup>, including the full PEIR were published on the Hornsea Three website on 26 July 2017 at the start of the Statutory Consultation period. The deadline for responding to the consultation under section 47 was the same as for the section 42 and 48 consultations, 20 September 2017.

<sup>26</sup> The EMF advisors were present at all events except Reepham Town Hall.

### Publicity

- 8.3.3.10 In addition to publicising the Statutory Consultation and Phase 2 community consultation events in local and national publications in accordance with section 48 (see section 8.3.4), Ørsted publicised the events through a number of different channels, including on the Hornsea Three website, in the Statutory Consultation document issued to local residents (see section 8.3.3.2), in the June 2017 community newsletter (Annex 16 of this Consultation Report, document reference number A5.1.16) and within a Company press release issued at the start of the consultation period.
- 8.3.3.11 During August 2017, Ørsted further advertised the events in local media, displayed posters at local shops, libraries and other local amenities and conducted a geographically targeted social media campaign to capture different groups within the community. Prior to and during events, Ørsted participated in a number of radio interviews to further raise the profile of the consultation and events to maximise attendance across all areas of the community.
- 8.3.3.12 Details of all the publicity for the Phase 2 community consultation events is provided in Annex 14 of this Consultation Report (document reference number A5.1.14).

### Compliance with the SoCC

- 8.3.3.13 Ørsted has complied with the consultation requirements as set out in the SoCC under Phase 2. This included a minimum of one round of consultation events, which took place in September 2017 under Phase 2.A. At the start of the consultation period, Ørsted issued a document detailing the consultation; where the consultation materials including the full PEIR and Non-Technical Summary could be accessed, inviting individuals to the events and informing them of the deadline for responses. A feedback form was provided and a Consultation Summary Report produced after the consultation closed. Table 5.2 above summarises how Ørsted has complied with the commitments set out in the SoCC.

## 8.3.4 Section 48 Statutory Publicity

### Legislative context

- 8.3.4.1 Under section 48 of the 2008 Act, the Applicant must publicise the proposed application in the prescribed manner in accordance with Regulation 4 of the APFP Regulations 2009 and must set a deadline for receipt of responses.
- 8.3.4.2 Under Regulation 4, the Applicant must publicise a proposed application:
- For at least two successive weeks in one or more local newspapers circulating in the vicinity in which the proposed development would be situated;
  - Once in a national newspaper;
  - Once in the London Gazette and, if land in Scotland is affected, the Edinburgh Gazette; and

<sup>27</sup> The exhibition banners were published in September 2017 in line with the start of the events. Unfortunately it was not possible to upload the 3D Webtech Tool to the Hornsea Three website.

- iv. Where the proposed application relates to offshore development –
- v. Once in the Lloyd's List; and
- vi. Once in an appropriate fishing trade journal.

8.3.4.3 The matters contained within the notice must include:

- i. The name and address of the Applicant;
- ii. A statement that the Applicant intends to make an application for development consent;
- iii. A statement as to whether the application is EIA development;
- iv. A summary of the main proposals, specifying the location or route of the proposed development; a statement that the documents, plans and maps showing the nature and location of the proposed development is available for inspection free of charge at the places (including at least one address in the vicinity of the proposed development) and times set out in the notice;
- v. The latest date on which those document, plans and maps will be available for inspection (being a date not earlier than the deadline in sub-paragraph (i));
- vi. Whether a charge will be made for copies of any of the documents, plans or maps and the amount
- vii. of any charge;
- viii. Details of how to respond to the publicity; and
- ix. A deadline for receipt of those responses by the applicant, being no less than 28 days following the date when the notice is last published.

Evidence of compliance with the relevant legislation is in provided Annex 2 to the Consultation Report (document reference number A5.1.2).

**Content of the notice**

8.3.4.4 The section 48 notice outlined the required information under Regulation 4(4) of the APFP Regulations 2009. A copy of the notice publicised in accordance with section 48 under Phase 2.A is provided in Annex 9 to this Consultation Report (document reference number A5.1.9).

**Publication and timings**

8.3.4.5 In accordance with section 48 and Regulation 4(3), Ørsted published its section 48 notice in July and August 2017 regarding the first round of Statutory Consultation (Phase 2.A) in the publications listed in Table 8.4. The specific dates varied by newspaper due to different publication dates. Dated newspaper cuttings are provided in Annex 9 of this Consultation Report (document reference number A5.1.9).

**Table 8.4: List of publications under section 48 for statutory consultation on the PEIR.**

Publication	Date
Eastern Daily Press	29 July 2017 and 5 August 2017
Norwich Evening News	29 July 2017 and 5 August 2017
North Norfolk News	3 August 2017 and 10 August 2017
Diss, Wymondham and Attleborough Mercury <sup>28</sup>	3 August 2017 and 10 August 2017
The Guardian	31 July 2017
The London Gazette	31 July 2017
Lloyd's List	1 August 2017
Fishing News	3 August 2017

8.3.4.6 A deadline for receipt of responses to the publicity under section 48 in association with Statutory Consultation on the PEIR (Phase 2.A) was set for 20 September 2017, in line with the deadline for responses under sections 42 and 47 of the 2008 Act. The consultation began the day after the final notice was placed in local newspapers on 10 August 2017, (see section 8.3.4 of this Consultation Report), meaning a total of 41 days commencing the day after the last notice was published.

8.3.4.7 All consultees identified under section 42 of the 2008 Act were provided with a copy of the section 48 notice as required by Regulation 11 of the EIA Regulations.

8.3.4.8 Documents, plans and maps showing the nature and location of Hornsea Three, including the full PEIR in soft copy format (USB stick drive) (with a non-technical summary) for Hornsea Three, were available free of charge during the Statutory Consultation period from 27 July 2017 until 20 September 2017 at the places and times set out in Table 8.5.

8.3.4.9 A printed copy of the full PEIR was available at the Norfolk and Norwich Millennium Library.

<sup>28</sup> The Diss, Wymondham and Attleborough Mercury are identical in terms of print and therefore only one copy of the notice is provided for the purpose of this Consultation Report.

Table 8.5: Local deposit points for Statutory Consultation materials.

Deposit Point	Opening hours
North Norfolk District Council, Council Offices, Holt Road, Cromer, Norfolk, NR27 9EN	Monday, Tuesday and Thursday: 8:30am to 5pm, Wednesday: 10am to 5pm, Friday: 8:30am to 4:30pm
Broadland District Council, 1 Yarmouth Road, Thorpe St Andrew, Norwich, NR15 2XE	Monday to Friday: 8:30am to 5pm
South Norfolk District Council, South Norfolk House, Cygnet Court, Long Stratton, Norwich, NR15 2XE	Monday to Friday: 8:15am to 5pm
Broads Authority, Yare House, 62-64 Thorpe Road, Norwich, NR1 1RY	Monday to Friday: 9am to 5pm
Breckland District Council, Elizabeth House, Walpole Loke, Dereham, NR19 1EE	Monday to Thursday: 8am to 6pm
Great Yarmouth Borough Council, Town Hall, Hall Plain, Great Yarmouth, NR30 2QF	Monday to Friday: 9am to 5pm
Norwich City Council, City Hall, St Peters Street, Norwich, NR2 1NH	Monday to Friday: 8am to 5pm Customer Centre: Monday, Tuesday, Wednesday and Friday: 8:45am to 5pm
Norfolk County Council, County Hall, Martineau Lane, Norwich, Norfolk, NR1 2DH	Monday to Friday: 9am to 5pm
Holt Library, 9 Church Street, Holt, NR25 6BB	Monday to Wednesday: 9.30am to 1pm, Friday: 9.30am to 6pm, Saturday: 9.30am to 1pm
Reepham Library, Bircham Institute, Market Place, Norwich, NR10 4JJ.	Monday: 2pm to 7pm, Wednesday: 9.30am to 1pm and 2pm to 5pm, Friday: 10am to 1pm and 2pm to 5pm, Saturday: 9.30am to 12.30pm.
Hethersett Library, Queens Road, Hethersett, Norwich, NR9 3DB.	Monday: 8am to 5pm, Wednesday: 8am to 5pm, Thursday: 8am to 7pm, Friday: 8am to 5pm, Saturday: 8am to 1pm.
Taverham Library, 9 Sandy Land, Taverham, Norwich, NR8 6JR.	Monday: 9am to 1pm and 2pm to 5pm, Tuesday: 9am to 1pm, Wednesday: 2pm to 5pm, Thursday 2pm to 8pm, Friday: 9am to 1pm and 2pm to 5pm, Saturday: 9am to 1pm
Poringland Library, Overtons Way, Poringland, Norwich, NR14 7WB	Monday: 9am to 5pm, Tuesday: 2pm to 5pm, Wednesday: 9am to 1pm, Thursday: 2pm to 7.30pm, Friday: 2pm to 5pm, Saturday: 9.30am to 1pm
Norfolk and Norwich Millennium Library, The Forum, Millennium Plain, Norwich, NR2 1AW*	Monday-Friday: 10am to 7pm, Saturday: 9am to 5pm

## 8.4 Further Statutory Consultation (Phase 2.B)

### 8.4.1 Summary

8.4.1.1 Ørsted undertook Further Statutory Consultation (Phase 2.B) on Hornsea Three under section 42 of the 2008 Act between 25 November and 22 December 2017. This Further Statutory Consultation sought feedback on additional locations beyond the previous Statutory Consultation (Phase 2.A) boundary identified in response to feedback from the first round of statutory consultation and ongoing design development, where works were proposed.

### 8.4.2 Section 42

#### **Identification of the relevant landowners and those with an interest in the land (Section 42(1)(d) Consultees as outlined in section 44)**

8.4.2.1 Ørsted undertook a similar process as for the Statutory Consultation associated with the PEIR to identify additional land interests for the additional locations identified following statutory consultation under Phase 2 and ongoing design development (see section 8.3.2.10 to 8.3.2.13 of this Consultation Report).

8.4.2.2 New and existing land interests (where relevant) were sent the further statutory consultation documents as detailed in section 8.4.2.7 of this Consultation Report. Only those landowners affected by the proposed amendments were consulted with under the Further Statutory Consultation (Phase 2.B).

8.4.2.3 Where owners, lessees, tenants or occupiers were unknown, Ørsted placed notices detailing the consultation at the relevant locations along the onshore cable corridor (Annex 7, document reference number A5.1.7). These notices were installed on 23 November 2017 and removed on 4 January 2018 and were on display for a six-week period.

8.4.2.4 During the consultation period, the signs were checked on a weekly basis, with photographs taken on each visit. If a notice was damaged or missing it was replaced at the time. An example of the notice and a map showing the locations where the notices were placed can be viewed in Annex 7 of this Consultation Report (document reference number A5.1.7).

#### **Section 42 consultation activities**

8.4.2.5 Further Statutory Consultation (Phase 2.B) under section 42 of the Planning Act commenced on 25 November 2017 and the deadline for responses was 22 December 2017. Therefore, the total duration of the consultation period was 28 days, in accordance with the statutory minimum of 28 days. Consultation under sections 47 and 48 of the 2008 Act was undertaken in parallel and closed on the same date to avoid confusion.

8.4.2.6 In accordance with section 46 of the 2008 Act, Ørsted notified PINS in writing in advance of the Further Statutory Consultation period on 15 November 2017 and provided PINS with the consultation documents. See Annex 8 (document reference number A5.1.8) to this Consultation Report.

8.4.2.7 On the 20, 21 and 22 November 2017, Ørsted wrote to the section 42 consultees (Annex 3, document reference number A5.1.3) to notify them of the consultation, including where the consultation documents could be viewed free of charge and the deadline for responding to the consultation (see Annex 6 to this Consultation Report, document reference number A5.1.6). This letter included the following;

- Hard copy of the further Statutory Consultation Plans (Figure 8.3);
- Hard copy of notice publicised in accordance with section 48 of the 2008 Act (Annex 9 to the Consultation Report, document reference number A5.1.9); and
- Hard copy of 'Section 42 Consultation. Potential Offshore Alternative Routes – Supporting Information'.

8.4.2.8 It was noted that some consultees did not receive the document entitled 'Section 42 Consultation. Potential Offshore Alternative Routes - Supporting Information' document. To ensure that all consultees received this document, Ørsted wrote to all section 42 consultees on 5 December 2017 to notify them (see Annex 6 to this Consultation Report, document reference number A5.1.6). A hard copy of the document was enclosed and the deadline for responses relating to the potential offshore alternative cable corridors was extended until 7 January 2018, to ensure that consultee had sufficient time to respond, should they have not been able to access the soft copy which was available on the Hornsea Three website from 16 November 2016.

8.4.2.9 All the consultation documents associated with the further statutory consultation were available to view or download from the Hornsea Three website from 16 November 2017.

### 8.4.3 Section 47

#### *Consultation activities*

8.4.3.1 A document entitled "Further Statutory Consultation – Hornsea Project Three" was published on the Hornsea Three website on 16 November 2017 and was issued to members of the local of the community and the relevant parish councils (see Annex 14 to this Consultation Report, document reference number A5.1.14). This document contained more information on the consultation, including a plan detailing the proposed additional areas being considered by Hornsea Three and information on how to respond to the consultation.

8.4.3.2 The additional areas were broken down by category and a brief description of each was included to assist local understanding of what was being proposed. A timeline was included to enable consultees to see how this consultation complimented the previous round of consultation and a list of locations (including the Hornsea Three website) where more detailed plans could be viewed was provided.

8.4.3.3 A hard copy of the document was issued to local communities within the newsletter distribution area (Annex 16, document reference number A5.1.16) in November 2017 and a soft copy issued by email, for those individuals who had requested information by email rather than post. This included everyone who had registered their interest in Hornsea Three either via the website or through the information lines.

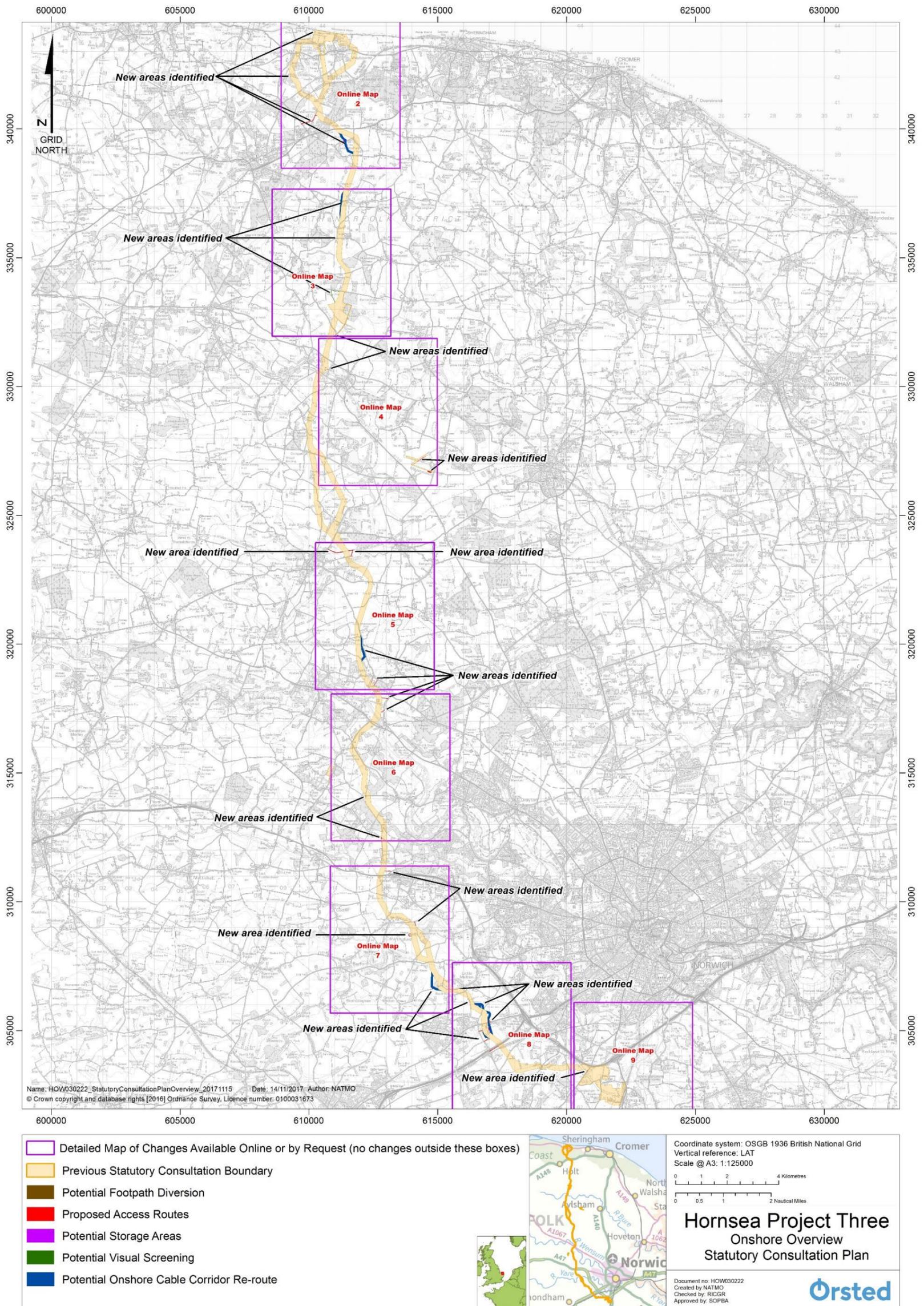


Figure 8.3: Further Statutory Consultation plan, as presented in the document that form part of the section 47 consultation.

## 8.4.4 Section 48 statutory publicity

8.4.4.1 In accordance with section 48 and Regulation 4(3), Ørsted published its section 48 notice in the publications listed below in November 2017 (Table 8.6) (specific dates varied due to different publication dates). Evidence of these notices can be found in Annex 9 of this Consultation Report (document reference number A5.1.9).

Table 8.6: List of publications under section 48 for Further Statutory Consultation (Phase 2.B).

Publication	Date
Eastern Daily Press	17 November 2017 and 24 November 2017
Norwich Evening News	17 November 2017 and 24 November 2017
North Norfolk News	16 November 2017 and 23 November 2017
Diss, Wymondham and Attleborough Mercury	16 November 2017 and 23 November 2017
The Guardian	17 November 2017
The London Gazette	16 November 2017
Lloyd's List	16 November 2017
Fishing News	16 November 2017

8.4.4.2 A deadline for receipt of responses to the publicity under section 48 in association with the Further Statutory Consultation (Phase 2.B) was set for 22 December 2017, in line with the deadline for responses under section 42 of the 2008 Act. The final notice was published on 24 November 2017, meaning a total of 28 days, commencing the day after the last notice.

8.4.4.3 All consultees identified under section 42 of the 2008 Act were provided with a copy of the section 48 notice as required by Regulation 11 of the EIA Regulations.

8.4.4.4 The relevant documents and plans which formed part of the Further Statutory Consultation (Phase 2.B) for Hornsea Three, were available free of charge during the Further Statutory Consultation period from 16 November 2017 until 7 January 2018 at the locations and times listed in Table 8.7.

### Content of the notice

8.4.4.5 The section 48 notice outlined the required information under Regulation 4(4) of the APFP Regulations 2009. A copy of the section 48 notice publicised as part of the further statutory consultation (Phase 2.B) is available in Annex 9 of this Consultation Report (document reference number A5.1.9).

Table 8.7: Local deposit points for Further Statutory Consultation (Phase 2.B) materials.

Deposit Point	Opening hours
<b>North Norfolk District Council</b> , Council Offices, Holt Road, Cromer, Norfolk, NR27 9EN	Monday, Tuesday and Thursday: 8:30am to 5pm, Wednesday: 10am to 5pm, Friday: 8:30am to 4:30pm
<b>Broadland District Council</b> , 1 Yarmouth Road, Thorpe St Andrew, Norwich, NR15 2XE	Monday-Friday: 8:30am to 5pm
<b>South Norfolk District Council</b> , South Norfolk House, Cygnet Court, Long Stratton, Norwich, NR15 2XE	Monday-Friday: 8:15am to 5pm
<b>Holt Library</b> , 9 Church Street, Holt, NR25 6BB	Monday-Wednesday: 9.30am to 1pm, Friday: 9.30am to 6pm, Saturday: 9.30am to 1pm
<b>Reepham Library</b> , Bircham Institute, Market Place, Norwich, NR10 4JJ.	Monday: 2pm to 7pm, Wednesday: 9.30am to 1pm and 2pm to 5pm, Friday: 10am to 1pm and 2pm to 5pm, Saturday: 9.30am to 12.30pm.
<b>Hethersett Library</b> , Queens Road, Hethersett, Norwich, NR9 3DB.	Monday: 8am to 5pm, Wednesday: 8am to 5pm, Thursday: 8am to 7pm, Friday: 8am to 5pm, Saturday: 8am to 1pm.
<b>Taverham Library</b> , 9 Sandy Land, Taverham, Norwich, NR8 6JR.	Monday: 9am to 1pm and 2pm to 5pm, Tuesday: 9am to 1pm, Wednesday: 2pm to 5pm, Thursday 2pm to 8pm, Friday: 9am to 1pm and 2pm to 5pm, Saturday: 9am to 1pm
<b>Poringland Library</b> , Overtons Way, Poringland, Norwich, NR14 7WB	Monday: 9am to 5pm, Tuesday: 2pm to 5pm, Wednesday: 9am to 1pm, Thursday: 2pm to 7.30pm, Friday: 2pm to 5pm, Saturday: 9.30am to 1pm

## 8.5 Focussed Statutory Consultation (Phase 2.C)

### 8.5.1 Summary

8.5.1.1 Ørsted undertook Focussed Statutory Consultation (Phase 2.C) on Hornsea Three under section 42 of the 2008 Act between 1 March and 30 March 2018. This Focussed Statutory Consultation sought feedback on a number of minor amendments to the Hornsea Three onshore cable corridor only (Figure 8.4), following feedback received as part of the Further Statutory Consultation (Phase 2.B), which took place between 25 November and 22 December 2017.

### 8.5.2 Section 42

8.5.2.1 The Focussed Statutory Consultation (Phase 2.C) under section 42 of the 2008 Act commenced on 1 March and the deadline for responses was 30 March 2018. Therefore, the total duration of the consultation period was 30 days, in accordance with the statutory minimum of 28 days. This time frame was considered sufficient given the volume of information being consulted on, primarily a set of statutory plans showing a number of minor changes to the Hornsea Three onshore cable corridor.

**Focussed Statutory Consultation consultees**

8.5.2.2 Ørsted consulted with the following bodies as part of the focussed statutory consultation:

- Prescribed bodies under Schedule 1 of the APFP Regulations 2009;
- The relevant Parish Councils<sup>29</sup>;
- Statutory Undertakers affected by the proposed change; and
- Landowners affected by the proposed change<sup>30</sup> (see Annex 3, document reference number A5.1.3).

8.5.2.3 Only those landowners affected by the proposed amendments and any new land interests identified (where relevant) were consulted with under the Focussed Statutory Consultation (Phase 2.C). There were four unknown parcels of land, however all four were public highway and therefore no site notices were required.

**Section 42 consultation activities**

8.5.2.4 In accordance with section 46 of the 2008 Act, Ørsted notified PINS in advance of the Focussed Statutory Consultation (Phase 2.C) period on 26 February 2018 and provided PINS with the consultation documents (Annex 8 of this Consultation Report, document reference number A5.1.8).

8.5.2.5 On the 27 February 2018, Ørsted wrote to the relevant section 42 consultees (as listed in section 8.5.2.2) to notify them of the consultation, including where the consultation documents could be viewed and the deadline for responding to the consultation. This letter included the following:

- Hard copy of the Focussed Statutory Consultation Plans.

8.5.2.6 Due to the nature of the proposed amendments for consultation, the consultation activities were focussed and no consultation was undertaken under sections 47 or 48 of the 2008 Act. The consultation materials were however made available for public inspection on the Hornsea Three website for the duration of the consultation and in hard copy format at libraries listed in Table 8.8.

8.5.2.7 The reduced number of deposit points relative to the previous consultations reflects the focussed nature of the consultation. Ørsted prioritised venues located close to the cable route that were able to host the full suite of documents. The consultation documents were also available on the Hornsea Three website and on demand via the information lines.

8.5.2.8 The consultation documents associated with the Focussed Statutory Consultation (Phase 2.C) were available to view or download from the Hornsea Three website from 28 February 2018.

8.5.2.9 A summary of the relevant responses received as part of the Focussed Statutory Consultation (Phase 2.C) is provided within Annex 15 of this Consultation Report (document reference number A5.1.15).

**Table 8.8: Local deposit points for Focussed Statutory Consultation materials.**

Deposit Point	Opening hours
Holt Library, 9 Church Street, Holt, NR25 6BB	Monday-Wednesday: 9.30am to 1pm, Friday: 9.30am to 6pm, Saturday: 9.30am to 1pm
Hethersett Library, Queens Road, Hethersett, Norwich, NR9 3DB.	Monday: 8am to 5pm, Wednesday: 8am to 5pm, Thursday: 8am to 7pm, Friday: 8am to 5pm, Saturday: 8am to 1pm.

<sup>29</sup> Only those Parish Councils within which a change was proposed.

<sup>30</sup> It is noted that several the proposed amendments were made at the landowners' request.

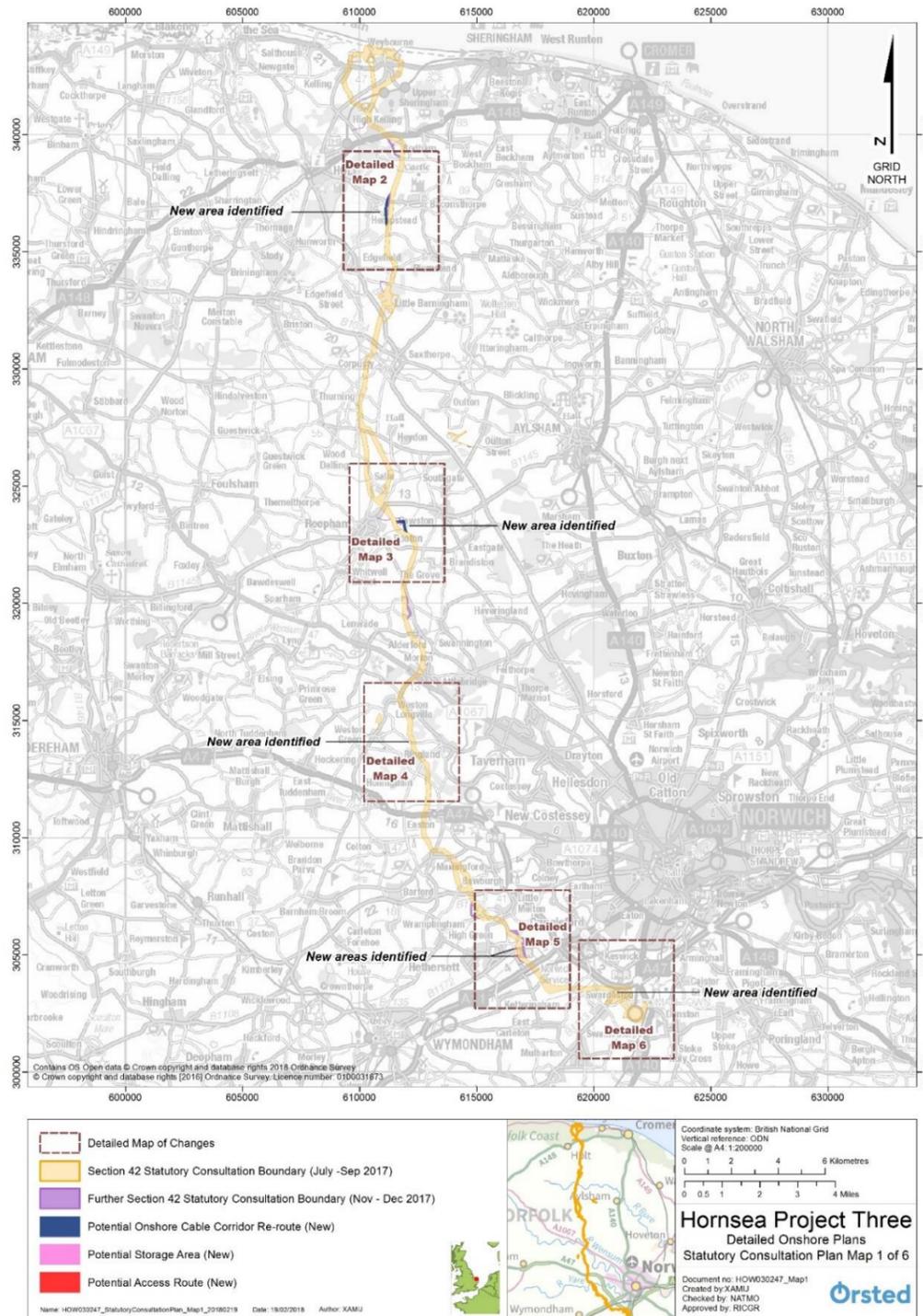


Figure 8.4: Focussed Statutory Consultation plan (Phase 2.C).

## 9. Phase 2: Summary of responses

### 9.1 Summary

9.1.1.1 This section of the Consultation Report provides a summary of the responses received and how these were considered by Ørsted in the final DCO application for Hornsea Three. The responses have been categorised by subject and include comments received in response to all three rounds of statutory consultation under Phase 2 as detailed in section 8 of this Consultation Report.

9.1.1.2 Hornsea Three has similarities, both in terms of the nature of the development and its location, to Hornsea Project One and Hornsea Project Two. The matters relevant to Hornsea Three, which were raised by consultees during the pre-application and examination phases of Hornsea Project One and Hornsea Project Two, are set out in the Environment Statement, volume 4, annex 1.1: Hornsea Project One and Hornsea Project Two Consultation of Relevance to Hornsea Three (document reference number A6.4.1.1).

9.1.1.3 Consultation on Hornsea Three was an iterative process taken over several months or years. The intention of this section is to draw out the key issues only, with a focus on the statutory consultation periods primarily. References are made throughout to relevant chapters in the Environmental Statement (document reference number A6).

9.1.1.4 As part of the statutory consultation, very few comments were received relating to the Introduction, Policy and Legislation and EIA Methodology chapters of the PEIR. Tables of all relevant responses and how Ørsted have had regard to these in the final application are provided in Annex 15 of this Consultation Report (document reference number A5.1.15).

### 9.2 Overall

#### 9.2.1 Project Description

##### *Summary of key changes made as a result of feedback*

9.2.1.1 Table 9.1 provides a summary of the key issues raised in response to the project description and changes made to Hornsea Three as a result of feedback. In some cases, changes to the project description made after the Statutory Consultation on the PEIR at Phase 2.A have reduced the potential impacts on receptors and where this is the case, it is discussed within the relevant topic sections below.

**Table 9.1: List of key changes made to the project description as a result of feedback.**

Change	Justification
Turbines	In response to comments received from stakeholders, including Natural England and members of the local community during Phase 2.A, Ørsted reduced the maximum number of turbines from 342 to 300 to reduce the magnitude of the impact on a number of receptors, including offshore ornithology, and is discussed in the relevant EIA topic sections below.
Floating Foundations	In response to feedback, including from the NFFO, and further refinement of Hornsea Three, Ørsted removed floating foundations as an option for the turbine foundations. This has reduced the impact Hornsea Three will have on commercial fishing, and shipping and navigation receptors.
Offshore HVAC booster station	In response to feedback from stakeholders including Trinity House and SNCB's, Ørsted refined the offshore HVAC booster station search area to take into account concerns relating to potential impacts on the North Norfolk Sandbanks and Saturn Reef Special Area of Conservation (SAC), in addition to potential impacts on shipping and navigation.
Offshore Cable Protection	In response to feedback from Natural England, cable protection will be managed sensitively in designated sites and concrete mattresses will not be used as a method of cable protection in environmentally designated sites except where required for crossing existing assets.
	In response to feedback from Natural England, Ørsted has reduced the amount of cable protection required in designated sites. The maximum design scenario for cable protection along the Hornsea Three offshore cable corridor has been refined since PEIR such that the maximum design scenario is for cable protection of up to only 10% of the length of cables within the designated sites.
Construction Programme	<p>In the PEIR, it was noted that due to the scale of the proposed development and existing regulatory framework, it could be necessary for Hornsea Three to be built out in up to three phases. As part of the Statutory Consultation, Ørsted received a considerable amount of feedback from stakeholders, including from SNCB's, Parish Councils, the local community and landowners on this aspect of the proposal and through detailed discussions with the technical and commercial team was able to reduce the maximum number of phases from three to two phases.</p> <p>Reducing the maximum number of phases also enabled Ørsted to reduce the maximum window over which onshore construction could take place, from eleven years presented in the PEIR, to eight years. An indicative construction programme showing how Hornsea Three could be built out in both a single and two-phased approach is included in volume 1, chapter 3: Project Description (document reference number A6.1.3) of the Environmental Statement.</p>
Horizontal Directional Drills	In the PEIR, Ørsted proposed that under the maximum design scenario, the entire Hornsea Three onshore cable corridor could be installed using open cut trenching methods only. This raised concerns with stakeholders including SNCB's and landowners in terms of the potential impact on onshore ecology. In response to feedback and through ongoing design development, Ørsted identified and has committed in the DCO application to HDD at over seventy points along the Hornsea Three onshore cable corridor, including major roads, river crossings, designated sites and woodlands. This method of installation enables the export cables to be installed without disturbing the surface infrastructure. This has helped reduced the potential impact on ecology and traffic and transport receptors.

9.2.1.2 In addition to the above, Ørsted has also sought to provide additional details within the DCO application regarding activities typically undertaken during the operation and maintenance phase, including various activities that would not typically be applied for until post consent. This information has been added to provide a more comprehensive overview of Hornsea Three.

#### HVAC vs HVDC

9.2.1.3 In response to the Statutory Consultation on the PEIR (Phase 2.A), several stakeholders including a number of landowners, parish councils and members of the community along the route, community groups and members of the community expressed a strong preference for Ørsted to adopt a DC transmission rather than AC. These comments were acknowledged by Ørsted and it was recognised that further justification for why both options were being considered for Hornsea Three was required. In response to concerns, Ørsted prepared responses to some of the commonly asked questions and published this as part of the FAQs on the Hornsea Three website.

9.2.1.4 Ørsted has applied for both AC and DC technology as part of the DCO application. It was explained that due to uncertainties around the deliverability of the DC solution for a number of reasons, including system reliability, market availability and lead times. A decision on which transmission to adopt will not be made until post consent, at which stage further discussions will have taken place with potential system suppliers and Ørsted will be able to make a more informed decision.

## **9.2.2 Site Selection**

9.2.2.1 This section provides a summary of the relevant responses to the site selection process for Hornsea Three and the key changes made as a result of feedback. Following submission of the PEIR, a number of modifications were made to Hornsea Three as a result of further design refinements and engineering design optimisation, taking on board stakeholder feedback from the Statutory Consultation (Phase 2.A) on the PEIR, informal consultation with landowners, responding to findings from site specific additional environmental assessments and also to further reduce and offset the potential environmental effects.

9.2.2.1 Some of these alterations (which had not been consulted on as part of the PEIR consultation or within the Statutory Consultation Plans), required the proposed Hornsea Three cable corridor to fall outside of the PEIR cable corridor (Figure 8.2). After consultation on the PEIR, Ørsted held two additional rounds of consultation on these alterations; Further Statutory Consultation (Phase 2.B) and Focused Statutory Consultation (Phase 2.C) to consult on these changes and to inform the public and stakeholders of the proposed alternative route options and design adjustments.

9.2.2.2 Consultation related to the following:

- Potential re-routes for sections of the Hornsea Three offshore cable corridor;
- A single preferred Hornsea Three onshore cable corridor search area of 200 m in width, with alternative cable corridors around design constraints or as a consequence of feedback received at Phase 2.A;

- Refinements to the onshore HVDC converter/HVAC substation and onshore HVAC booster station sites;
- Some potential construction compounds and storage areas; and
- Currently identified construction access routes.

9.2.2.3 Further information on the refinement process can be found in volume 4, Annex 4.3: Refinement of the Onshore Cable Corridor and Associated Infrastructure (Stages 5-7 Scoping to PEIR) (document reference number A6.4.4.3), and Annex 4.4: Post PEIR Changes to Hornsea Project Three (Stages 8-9) (document reference number A6.4.4.4) of the Environmental Statement.

**Summary of feedback and Ørsted response**

9.2.2.4 Feedback during Phase 2.A Statutory Consultation saw the following onshore project components subject to further refinement:

- Intertidal Zone refinement and Hornsea Three onshore cable corridor options in the vicinity of Weybourne;
- Onshore HVDC converter/HVAC substation refinement;
- A preferred Hornsea Three onshore cable corridor search area including consideration of alternative route options;
- Onshore HVAC booster station refinement; and
- Four potential locations for construction compounds.

9.2.2.5 This in turn led to Further Statutory Consultation (Phase 2.B) on alternative cable corridors which considered:

- Proposed access routes;
- Potential Hornsea Three onshore cable corridor re-routes;
- Potential storage areas;
- Additional area of potential visual screening around the onshore HVAC booster station;
- Potential footpath diversion near to the Hornsea Three intertidal area; and
- Two potential offshore alternative cable corridors (considered within Annex 4.2 - Selection and Refinement of the Offshore ECR and HVAC Booster Station (Stages 4-9) (document reference number A6.4.4.2) of the Environmental Statement).

9.2.2.6 Following feedback to Phase 2.B, a Focussed Statutory Consultation (Phase 2.C) considered 6 minor onshore amendments prior to finalisation of the application (red line) boundary of the project as set forward within volume 1, chapter 3: Project Description (document reference number A6.1.3) of the Environmental Statement.

Offshore cable corridor and offshore HVAC booster station

9.2.2.7 Following feedback received as part of the PEIR consultation, the Hornsea Three PEIR offshore cable corridor search area was reviewed specifically in relation to the Cromer Shoal Chalk Beds MCZ and North Norfolk Sandbank and Saturn Reef SAC where stakeholders requested that re-routes should be considered.

9.2.2.8 A supplementary information document was issued as part of the Further Statutory Consultation (Phase 2.B), which provided information on two 'potential offshore alternative routes' - one close to the offshore array area (known as the 'seaward potential alternative route'), and the other closer to Hornsea Three intertidal area (known as the 'near shore potential alternative route').

9.2.2.9 Following careful consideration, both potential alternative routes have been taken forward. The seaward potential alternative route reduces the direct impact of cable laying activities on the North Norfolk Sandbanks and Saturn Reef SAC. While the near shore potential alternative route does similar with regards to the Cromer Shoal Chalk Beds MCZ, consideration must be given to the greater potential impact upon the Wash and North Norfolk Coast SAC. A RIAA (document reference number A5.2) has been completed that gives full consideration of the cable installation, operation and maintenance, and decommissioning activities within these relevant SACs. Specific feedback from consultees is further detailed below in sections 9.3.2 and 9.3.3 of this Consultation Report and within the consultation tables in Annex 15 of this Consultation Report (document reference number A5.1.15).

Hornsea Three landfall area

9.2.2.10 The preferred location of the cable landfall and temporary landfall compound was informed by a number of technical and environmental factors both onshore and within the nearshore area along the coast, as well as feedback received during both statutory and non-statutory consultations. One aspect of this was aligning the offshore and onshore cable corridors and selecting a route that would be technically feasible, whilst reducing environmental impacts.

9.2.2.11 Selecting a route to the western most points of the landfall zone enables the route to join up with the offshore cable corridor, which was re-routed to avoid the Cromer Shoal Chalk Reef and a great proportion of the MCZ. Onshore there were also constraints associated with the eastern cable corridor, with the western route offering greater room to accommodate the Transition Joint Bay area. Locally there were also concerns regarding the potential impact on Weybourne, and it was recognised by Ørsted that communities had already been subject to a number of other developments; including Sheringham Shoal and Dudgeon offshore wind farms and had particular concerns regarding the placements of the compound in relation to the beach, car park and beach lane which is the only access point for a number of properties. Selecting the western most point of the landfall zone moves the works further away from Weybourne reduces potential impact/access to the beach.

9.2.2.12 Closely related to the landfall zone refinement was the onshore cable corridor in the immediate vicinity of the Hornsea Three landfall area, for which three potential routes were considered. Two of these routes were presented in the PEIR and a third alternative route was presented in the Statutory Consultation (Phase 2.A) plans in response to feedback received during Phase 1.B, including concerns regarding the impact on Kelling Heath SSSI/County Wildlife Site (CWS) and interaction with the heritage railway line. As part of the PEIR consultation, feedback was gathered on this alternative cable corridor in addition to the two existing cable corridor and the alternative route was subsequently taken forward, which avoids cliffs and geomorphological SSSIs, avoids the technically challenging engineering design that would be required to HDD to original route under the railway and avoids Kelling Heath SSSI.

Onshore cable corridor

9.2.2.13 The final Hornsea Three onshore cable corridor as presented in the Environmental Statement (document reference number A6) is the result of multi-disciplinary workshops, discussions and decision making across the entire onshore cable corridor, in response to consultee comments and feedback and detailed technical, commercial and environmental studies. The optimum Hornsea Three onshore cable corridor for an onshore grid connection can be considered to be the shortest route from A to B from land to the main National Grid substation. The final Hornsea Three onshore cable corridor presented within the Environmental Statement (document reference number A6) is considered to effectively achieve this optimisation, within the environmental, technical and social constraints that have been identified along the proposed Hornsea Three onshore cable corridor.

*Examples of changes made to the onshore cable corridor as a result of landowner feedback*

9.2.2.14 In response to landowner feedback (and other feedback) gathered during Phase 1 consultation, and prior to the commencement of Phase 2 consultation, Ørsted identified a potential alternative onshore cable corridor near Salle that was not assessed within the PEIR, however was shown on the Statutory Consultation plans for Phase 2.A (Figure 8.2), in order to gather feedback on it at that stage. The landowner feedback identified that the proposed alteration would minimise the loss of good quality land take, move the cable corridor further away from existing heritage assets; avoid ecologically sensitive ponds, and additionally the alternative route avoids a wider section of a tributary of the River Wensum (a river designated as a Special Area of Conservation) and reduces the requirement to cross PRoW.

9.2.2.15 Consultation feedback also provided new localised information that informed onshore cable corridor decisions, for example at Pitt Farm Campsite, to the east of Hempstead. The PEIR consultation (Phase 2.A) identified a new campsite with access track, to the south of The Street, on the western extremity of Baconsthorpe, on land owned and operated by the owners of Pitt Farm. The landowners also identified a marl pit within a field to the north of The Street, which was between 20 to 30 ft (approximately 6 to 9 m) in depth. The landowners requested that the onshore cable corridor avoid the campsite as much as possible to minimise any impact on the campsite business during cable construction works. In response to this feedback, Ørsted proposed an alternative onshore cable corridor that would avoid the marl pit and the campsite and consulted on this as part of the further statutory consultation (Phase 2.B). The landowner then noted that the route could be further amended, which resulted in a further change, which was consulted on during the focussed statutory consultation (Phase 2.C).

9.2.2.16 In the vicinity of Little Melton, there were multiple iterations of the onshore cable corridor. The initial route passed through the settlements of Little Melton and Hethersett. Developing a route to the north of Little Melton was discounted as it is relatively built up and developing a route further south was discounted as, in addition to Beckhithe Meadow CWS, it was subject to the large new Taylor Wimpey housing development north of Hethersett. Following landowner discussions, it was suggested that an alternative route may be more suitable. A new route was suggested and whilst it was noted that it had not been fully assessed, it was presented in the Statutory Consultation Plans (Phase 2.A) as an alternative that was being considered so that Ørsted could gather feedback on this option. This alternative route did benefit from an increased separation from Grade II listed church that the original route came close to, however there were some concerns as it brought the route closer to the Grade II The Steward's House. Following PEIR, Ørsted re-evaluated the wider routing in this area as a result of feedback received and a third route was identified and consulted under the Further Statutory Consultation (Phase 2.B) (Figure 8.3). This route was discussed and agreed with the landowner, with a directional drill under the CWS woodland suggested to ensure that it minimised any potential ecological impacts.

9.2.2.17 In other cases, the onshore cable corridor has been altered to reduce the potential impact on important research areas. For example, through engagement with the John Innes Centre, Ørsted was able to gain a more detailed understanding of their crop and plant research trials at Bawburgh and was able to identify a lower impact onshore cable corridor in this area than that originally proposed. Further examples are presented in the Site Selection and Consideration of Alternatives chapter of the Environmental Statement and supporting annexes (document reference number A6.1.4).

#### Onshore HVAC booster station

- 9.2.2.18 As explained in section 2.5.1.4 of this Consultation Report and volume 1, chapter 3: Project Description (document reference number A6.1.3) of the Environmental Statement, an onshore HVAC booster station could potentially be required if an alternating current electrical system is developed. In addition to the permanent footprint of the building which is detailed in volume 1, chapter 3: Project Description (document reference number A6.1.3) of the Environmental Statement, a temporary construction compound is required to support the construction of the building, however this would only be required during the construction phase of the onshore HVAC booster station.
- 9.2.2.19 In response to feedback and following additional detailed electrical design, the footprint and associated compound for the onshore HVAC booster station have been substantially reduced in extent (by over 30 ha) from the larger search areas identified at PEIR. The alignment of the onshore HVAC booster station has also been adjusted to take further advantage of an existing belt of trees that lies immediately north, and to locate the building onto the lowest lying, flat land, to reduce the overall visual effect. The relocation also allowed the avoidance of hedgerows and trees and restricted the number of agricultural fields that would be affected. The DCO plans also identify a strategic landscaping corridor to allow for additional tree planting and visual screening of the onshore HVAC booster station.

#### Onshore HVDC converter/HVAC substation

- 9.2.2.20 Hornsea Three will require a new onshore HVDC converter/HVAC substation to be built in the vicinity of the existing Norwich Main national grid substation. Following detailed electrical substation design after Phase 2.A and in response to stakeholder feedback (section 9.4.4.2), the footprint of the substation increased slightly to provide increased landscaping and to rationalise the volume of ground works that would be required, with the footprint for the temporary construction compound reducing in size to minimise disturbance.
- 9.2.2.21 The final alignment of the compound is directly adjacent to the permanent footprint of the substation in order to be as far away from residential receptors as possible. A thin strip of land to the south of the onshore HVDC converter/HVAC substation has also been identified within the Development Consent Order (DCO) plans to enable the planting of a strategic landscape screening corridor. Further detail on the consultation feedback and proposed landscaping is provided in section 9.4.4 of this Consultation Report. In addition to the permanent footprint of the building which is detailed in volume 1, chapter 3: Project Description (document reference number A6.1.3) of the Environmental Statement, a temporary construction compound is required to support the construction of the building, however this would be limited to the period required for the installation of the onshore HVDC converter/HVAC station.

#### Compounds

- 9.2.2.22 In the PEIR, Ørsted stated that construction compounds of various sizes will be required along the onshore cable corridor, for laydown and storage of materials, plants and staff, as well as space for temporary offices, welfare facilities, security and parking. The current application provides for a hierarchy of construction compounds. In addition to the onshore HVDC converter/HVAC substation and onshore HVAC booster station compounds, the following temporary onshore compounds will also be required:
- Hornsea Three landfall construction compound;
  - Main construction compound;
  - Secondary compounds; and
  - Storage areas.
- 9.2.2.23 Feedback received as part of the Statutory Consultation helped to inform Ørsted's understanding of the potential challenges associated with each of the potential compound sites being considered for the main construction compound; including pressure on the local road network and cumulative impacts with other developments. Following publication of the PEIR, the other sites were discounted and Oulton Airfield selected. It is recognised by Ørsted that concerns remain regarding the use of this site specifically in terms of access; however, Hornsea Three will develop suitable traffic management measures in dialogue with the local authority and parish council to minimise potential impacts.
- 9.2.2.1 In refining the compounds post Statutory Consultation (Phase 2.A) on the PEIR, a number of secondary compound sites were identified adjacent to the onshore cable corridor. These sites are typically in agricultural use and often located in areas that could not be used by the farmer during construction because the cable installation works would have temporarily restricted access to these locations. Wherever possible they have been sited to avoid environmental constraints, are located away from sensitive receptors and closer to the more complex works such as HDD sites, onshore cable corridor pinch points or restricted working areas.

#### Access

- 9.2.2.2 Following PEIR submission, Ørsted further developed its access strategy and a number of potential access points that fell outside the area previously consulted on were identified. Ørsted consulted on these new areas as part of the Further Statutory Consultation (Phase 2.B) in late 2017. Since then, the access routes have been subject to further detailed adjustments with a key principle being to keep to existing access routes and roads wherever viable in order to minimise environmental and social impacts.
- 9.2.2.3 The final route and DCO plans for the Hornsea Three application are provided within volume 1, chapter 4: Site Selection and Consideration of Alternatives and the Works Plan (onshore) (document reference number A2.4.2) of the Environmental Statement.

## 9.3 Offshore

### 9.3.1 Marine Processes

9.3.1.1 Ørsted consulted a number of stakeholders on matters relating to marine processes including Natural England, Cefas, TWTs and the MMO. As part of the Evidence Plan process, the BE, MP and FSE EWG was established with representatives from the key regulatory bodies and their advisors and SNCBs.

9.3.1.2 The key issues raised relevant to marine processes, which have been identified during the statutory consultation activities undertaken for Hornsea Three to date include:

- Wave impact methodology;
- Change in seabed sediment type;
- Impact on suspended sediment levels;
- Impact on sandbank features; and
- Consideration for alternative methods of sandwave clearance.

#### **Summary of feedback and Ørsted response**

##### Wave impact methodology

9.3.1.3 The MMO raised concerns regarding the evidence based methodology used to assess the impact of waves, either as a single project or cumulatively, on sensitive receptors. New spectral wave modelling has now been undertaken both for Hornsea Three project alone and for the cumulative scenario involving Hornsea Project One, Hornsea Project Two and Hornsea Three. The results are presented in the Environmental Statement, volume 5, annex 1.1: Marine Processes Technical Annex (document reference number A6.5.1.1), appendix B and have informed the assessment of wave impacts in volume 2, chapter 1: Marine Processes (document reference number A6.2.1).

##### Change in seabed sediment type

9.3.1.4 A number of stakeholders raised concerns regarding the potential for large extents of chalk subsoils, particularly fine grains to be release into the water column and the potential for this to change the seabed sediment type where deposited. An assessment of the release of chalk subsoils into the water column as a result of cable installation has been included in the Environmental Statement (volume 2, chapter 1: Marine Processes (document reference number A6.2.1)). It is noted that finer chalk particles may be transported further, but are also more likely to be widely dispersed to very low concentrations and are subsequently unlikely to settle and accumulate in significant quantities.

##### Impact on suspended sediment levels

9.3.1.5 Both the MMO and Natural England raised concerns regarding the potential impact of material re-distribution from the mounds (from excavation of the HDD exit pits) throughout the shallow subtidal; permanent change to substrate from digging HDD pits into the chalk base; and the potential for suspended chalk to persist in the water column. In response to these concerns, new geophysical data was collected at the nearshore area and was used to inform the Environmental Statement, providing information with regards to potential morphological controls on the beach/ shallow nearshore seabed.

##### Impact on sandbank features

9.3.1.6 Both the MMO and Natural England noted that offshore sandbanks should be included in the shoreline morphology assessment. In response to their comments, offshore sandbanks are now included in the assessment and potential changes to marine protected areas with designated sandbank features are considered in more depth in the Environmental Statement, volume 2, chapter 1: Marine Processes (document reference number A6.2.1).

##### Consideration for alternative methods of sandwave clearance

9.3.1.7 Natural England advised that the EIA should consider whether sandwave clearance might be done by other types of dredging and to consider a scenario where a licence for new dredge disposal site is not granted and an existing site needs to be used. The assessment considers a number of alternative clearance methods which represent the maximum design scenario. Consideration has also been given to a scenario whereby material is disposed of some distance away from the dredging area.

9.3.1.8 It is noted that reducing the number of turbines for Hornsea Three will also reduce the potential impact on marine processes.

9.3.1.9 A summary of all relevant responses relating to marine processes can be found in Annex 15 of this Consultation Report (document reference number A5.1.15).

### 9.3.2 Benthic Ecology

9.3.2.1 Ørsted consulted with a number of statutory and non-statutory stakeholders on matters relating to benthic ecology including; Natural England, Cefas, TWTs, the MMO and the JNCC.

9.3.2.2 Following Statutory Consultation on the PEIR (Phase 2.A), further meetings were held with the BE, MP and FSE EWG, which included discussions on the updated baseline characterisation following collection of site specific survey data, and amendments to the impact assessment considering section 42 consultation responses.

9.3.2.3 The key issues raised relevant to benthic ecology, which have been identified during the statutory consultation activities undertaken for Hornsea Three to date include:

- Characterisation of the baseline and assessment methodology;
- Impacts on the North Norfolk Sandbanks and Saturn Reef SAC and the Wash and North Norfolk Coast SAC;
- Impacts on the Cromer Shoal Chalk Beds MCZ;
- Impacts of cable protection on designated sites; and
- Impacts of dredging on sandbank systems.

**Summary of feedback and Ørsted response**

Characterisation of the baseline and assessment methodology

9.3.2.4 In response to the Statutory Consultation on the PEIR (Phase 2.A), Natural England raised concerns that the sandbanks feature of the North Norfolk Sandbanks and Saturn Reef SAC was not sufficiently assessed. It was recommended that biotope level information be used to assess the impacts within protected sites to align with the designated features of sites. To address Natural England's concerns, the assessment presented in the Environmental Statement has been substantially revised since the PEIR. Each assessment section has also been amended to include separate sections for the consideration of impacts to the features of designated sites.

Impacts on the North Norfolk Sandbanks and Saturn Reef SAC

9.3.2.5 In response to concerns regarding the impact on the North Norfolk Sandbanks and Saturn Reef SAC, Ørsted proposed an alternative seaward offshore cable corridor near to the Hornsea Three array area. Ørsted consulted on the alternative offshore cable corridor as part of the Further Statutory Consultation (Phase 2.B) in November and December 2017. In their response to the Further Statutory Consultation, Natural England indicated support for the proposed offshore cable corridor, which would reduce the direct impact to the North Norfolk Sandbanks and Saturn Reef SAC due to the cable laying activities. Refinements made to the offshore HVAC booster station search area following the statutory consultation also reduce the impact on the North Norfolk Sandbanks Saturn Reef SAC.

Impacts on the Cromer Shoal Chalk Beds MCZ

9.3.2.6 In response to the Statutory Consultation (Phase 2.A), the MMO raised concerns regarding potential trenching through subtidal chalk, peat and clay features and recommended that an alternative offshore cable corridor, which would avoid permanent impacts on designated features within the Cromer Shoals Chalk Reef MCZ should be further explored. Similar concerns had also been raised previously in MCZ Working Group meetings by Natural England and were also reiterated in their response to Statutory Consultation (Phase 2.A). In response, Ørsted proposed a reroute to the nearshore section of the offshore cable corridor, which would avoid subtidal chalk, peat and clay features within the Cromer Shoals Chalk Beds MCZ. This alternative offshore cable corridor was subject to further statutory and non-statutory consultation with stakeholders. Ørsted also provided the MP, BE and FSE EWG and the MCZ working group an updated MCZ assessment to address some of the comments from the PEIR and to provide further information.

9.3.2.7 Ørsted consulted on the alternative nearshore cable corridor as part of the Further Statutory Consultation (Phase 2.B). The Norfolk Wildlife Trust, TWT and the Eastern Inshore Fisheries and Conservation Authority (EIFCA) welcomed the removal of the eastern offshore cable corridor within the Cromer Shoal Chalk Beds MCZ (previously presented in the PEIR) and indicated support for the nearshore reroute. Natural England was pleased that Ørsted had considered an alternative nearshore offshore cable corridor route as recommended through the Evidence Plan process, noting that would reduce the potential impacts to the MCZ, however raised concerns over the larger footprint of the offshore cable corridor within The Wash and North Norfolk Coast SAC. Both Natural England and The Wildlife Trust recommended that Ørsted undertake a more detailed assessment of the impact on The Wash North Norfolk Coast SAC.

9.3.2.8 Natural England requested a 'side by side' comparison of the habitats along each offshore cable corridor (original and re-route sections) in the nearshore together with potential impacts, their magnitude, sensitivities of receptors and proposed mitigation for the two near-shore route options. To address their concerns, Ørsted prepared a route comparison note for the MP, BE, FSE EWG and further information was provided during the EWG meetings between PEIR and submission, to better inform their response.

9.3.2.9 Although Natural England welcomed Ørsted's consideration of the alternative options for the nearshore offshore cable corridor, in discussions with Ørsted, Natural England noted that they believe there is insufficient information/evidence to support one offshore cable corridor over the other. This feedback was noted by Ørsted; however, in considering the alternatives, the nearshore offshore cable corridor has been taken forward for inclusion in the application on the basis of the reduced environmental effects to the Cromer Shoal and Chalk Beds MCZ as well as the reduced impacts on the SAC and MCZ combined. Further information regarding the offshore cable corridor route selection is presented in volume 4, annex 4.1: Offshore Export Cable Route Selection (document reference number A6.4.1.4) of the Environmental Statement.

9.3.2.10 Natural England also raised concerns over the lack of site-specific data along the section of the re-route that deviates from the original cable corridor. Natural England noted they have low confidence in the outputs of Sheringham Shoal OWF benthic surveys, which are in proximity to this area. Natural England advised Hornsea three to treat these data with caution and recommended that Hornsea Three project specific data is used as the main source of evidence where possible. As agreed with the MP, BE, FSE EWG at the meeting on 4 December 2017, the nearshore area, including the reroute (i.e. in the vicinity of the Cromer Shoal Chalk Beds MCZ), is characterised by a combination of site specific and desktop data sources. These are fully discussed in volume 5, annex 2.1: Benthic Ecology Technical Report. Natural England's concerns on the use of the Sheringham Shoal OWF data are assumed to relate to the design of the surveys and aims of the monitoring, as opposed to sampling technique and laboratory analysis.

9.3.2.11 Following the Further Statutory Consultation (Phase 2.B), Ørsted subsequently adopted the proposed alternative offshore cable corridors. This is presented in the application and all impacts, where relevant, on designated features of The Wash and North Norfolk Coast SAC and the Cromer Shoal Chalk Beds MCZ have been assessed and detailed in volume 2, chapter 2: Benthic Ecology (document reference number A6.2.2) of the Environmental Statement. Impacts to The Wash and North Norfolk Coast SAC are discussed further in the RIAA (document reference number A5.2) for Hornsea Three.

Impact of cable protection on designated sites

9.3.2.12 In response to the Statutory Consultation (Phase 2.A), Natural England also raised concerns regarding the long term and/or permanent effect of placement of cable protection on designated features, specifically the maximum design scenario of 25% of each export cable running through the Cromer Shoal Chalk Beds MCZ requiring cable protection in addition to that required for cable/pipeline crossings. In response to these concerns, Ørsted refined the maximum design scenario for cable protection for up to only 10% of the lengths of cables within the Cromer Shoal Chalk Beds MCZ. As detailed above, the Hornsea Three offshore cable corridor was also rerouted in the nearshore section and now avoids subtidal chalk, peat and clay features within the Cromer Shoal Chalk Beds MCZ as well as avoiding the need for crossings within the MCZ. Long term and permanent effects of cable protection on designated features during the operational phase are considered in volume 2, chapter 2: Benthic Ecology (document reference number A6.2.2) of the Environmental Statement.

Impact of dredging on sandbank systems

9.3.2.13 In their response, Natural England also requested that Ørsted consider disposal of dredged material outside the Hornsea Three offshore cable corridor to ensure that loss of sediment from the North Norfolk Sandbanks and Saturn Reef SAC sandbank system is minimised. Ørsted confirmed that sandwave material dredged within the North Norfolk Sandbanks and Saturn Reef SAC will be disposed of within the boundaries of the North Norfolk Sandbanks and Saturn Reef SAC, where possible, to keep the material within the same sandbank system. This is considered in volume 2, chapter 2: Benthic Ecology (document reference number A6.2.2) and volume 4, annex 3.2: Dredging and Disposal: Site Characterisation (document reference number A6.4.3.2) of the Environmental Statement.

9.3.2.14 A summary of all relevant responses relating to benthic ecology can be found in Annex 15 of this Consultation Report (document reference number A5.1.15).

**9.3.3 Fish and Shellfish Ecology**

9.3.3.1 Ørsted consulted with a number of statutory and non-statutory stakeholders on matters relating to fish and shellfish ecology including; Natural England, Cefas, MMO, TWT, EIFCA and EU commercial fisheries organisations. As part of the Evidence Plan process, the MP, BE and FSE EWG was established with representatives from the key regulatory bodies and their advisors and statutory nature conservation bodies, including the MMO, Cefas and Natural England.

9.3.3.2 Following section 42 consultation on the PEIR under Phase 2, further meetings were held with the EWG, which included discussions on the updated baseline characterisation following collection of site specific survey data, and amendments to the impact assessment considering section 42 consultation responses.

9.3.3.3 The key issues raised relevant to fish and shellfish ecology, which have been identified during the statutory consultation activities undertaken for Hornsea Three to date include:

- Impacts on coastal habitats;
- Impact on vulnerable species, including herring and sandeel; and
- Potential habitat loss and impact on local fishing industry.

**Summary of feedback and Ørsted response**

Impact on coastal habitats

9.3.3.4 In their response to the Statutory Consultation (Phase 2.A), EIFCA raised concerns regarding impacts on coastal habitats which provide important spawning and nursery areas for fish species. EIFCA was in broad agreement that many effects of cable installation may be temporary, with the exception of direct impacts on subtidal chalk and rock habitats, where habitats are unlikely to recover, resulting in a permanent loss of spawning and nursery areas. EIFCA advised avoiding such features, to reduce adverse environmental effects. In response to concerns, Ørsted re-routed the Hornsea Three offshore cable corridor to avoid the areas where chalk reef has been historically mapped.

Impact on vulnerable species, including herring and sandeel

9.3.3.5 The MMO and Natural England noted that herring and sandeel had been correctly identified as species of high vulnerability within the southern North Sea fish and shellfish study area. Natural England raised concerns that the impacts to herring and sandeel may be greater than assessed at PEIR and the MMO recommended that separate consideration is given to impacts on herring and sandeel species in the Environmental Statement. In the Environmental Statement, specific consideration has been given where relevant to herring and sandeel and this is presented in volume 2, chapter 3: Fish and Shellfish Ecology (document reference number A6.2.3) of the Environmental Statement.

9.3.3.6 The MMO and Cefas also raised concerns regarding the effects of construction related underwater noise on herring spawning grounds, reported in PEIR as being located 80 km to the west of the Hornsea Three array area. The MMO requested further detail on underwater noise modelling in the Environmental Statement, including a map displaying noise attenuation contours from piling in relation to distance to herring spawning grounds. Following the Statutory Consultation (Phase 2.A), the underwater noise modelling approach was discussed and agreed with the EWG and the full assessment, including maps as requested, can be found in volume 2, chapter 3: Fish and Shellfish Ecology (document reference number A6.2.3) of the Environmental Statement.

Potential habitat loss and impact on local fishing industry

9.3.3.7 In response to the PEIR, the MMO raised concerns regarding the method applied for calculating the proportion of habitat loss (as a percentage of the total southern North Sea fish and shellfish study area), which the MMO believed underestimated the significance of the impact on the local fishing industry. In their response, the MMO recommended that the potential magnitude of habitat loss is reassessed in the Environmental Statement. Habitat loss during cable installation and potential effects on brown crab and lobster habitats have been reassessed, presenting habitat loss numbers as a proportion of the mapped areas off the north Norfolk coast, where commercial fisheries target these species. Full consideration of habitat loss effects on fish and shellfish receptors, including coastal and nearshore species is presented in the Environmental Statement; volume 2, chapter 3: Fish and Shellfish Ecology (document reference number A6.2.3).

9.3.3.8 A summary of all relevant responses relating to fish and shellfish ecology can be found in Annex 15 of this Consultation Report (document reference number A5.1.15).

**9.3.4 Marine Mammals**

9.3.4.1 Ørsted consulted with a number of statutory and non-statutory stakeholders on matters relating to marine mammals. As part of the Evidence Plan process, a Marine Mammal EWG was established with representatives from the key regulatory bodies, SNCBs and non-statutory parties, including the MMO, Cefas, Natural England and TWT. Natural England liaised as appropriate with Joint Nature Conservation Committee (JNCC) throughout the process, who had delegated responsibility to Natural England. Ørsted also consulted with Whale and Dolphin Conservation.

9.3.4.2 Following the Statutory Consultation (Phase 2.A) on the PEIR under Phase 2, further meetings were held with the Marine Mammal EWG, which included discussions on the updated baseline characterisation following collection of site specific survey data, amendments to the impact assessment considering section 42 consultation responses, and presentation of outputs from the updated assessment.

9.3.4.3 The key issues raised relevant to marine mammals, which have been identified during the consultation activities for Hornsea Three to date include:

- Definition of magnitude and sensitivity;
- Noise modelling approach and piling assumptions;
- Impacts from noise generated from construction activities;
- Seal baseline characterisation and assessment; and
- Consideration of Oil and Gas seismic activity.

**Summary of feedback and Ørsted response**

Definition of magnitude and sensitivity

9.3.4.4 Both the MMO and Natural England raised concerns regarding the evaluation of the magnitude and sensitivity of the potential impacts from underwater noise on marine mammals. It was also recommended that the impacts from Unexploded Ordnance (UXO) detonations be included within the maximum design scenario for potential cumulative impacts. A full assessment of the potential impacts of underwater noise from Hornsea Three with a detailed methodology including the appropriate magnitude and sensitivity evaluation is provided in volume 2, chapter 4: Marine Mammals (document reference number A6.2.4) of the Environmental Statement, as well as the impacts from UXO detonations. This has been included as part of the assessment, however Ørsted are not seeking this as part of the application for development consent.

Noise modelling approach and piling assumptions

9.3.4.5 The members of the Marine Mammal EWG all raised concerns regarding the noise modelling that had been carried out for Hornsea Three, requesting that source noise levels for Sound Pressure Level (SPL) and Sound Exposure Level (SEL) should be provided and assessed. In response to concerns raised, Ørsted updated the information provided on source levels within volume 4, annex 3.1: Subsea Noise Technical Report (document reference number A6.4.3.1). The updated underwater modelling was based on the National Oceanic and Atmosphere Association (NOAA) guidance (NMFS, 2016) as instructed by the SNCB and agreed through the EWG process.

Impact from noise generated from construction activities

9.3.4.6 Natural England raised concerns regarding the noise modelling and piling assumptions undertaken for Hornsea Three in relation to harbour porpoise, recommending that the soft start period be extended. In response to Natural England's comments, the piling assumptions were updated and additional modelling undertaken following further engineering optimisation. These are detailed in volume 4, annex 3.1: Subsea Noise Technical Report (document reference number A6.4.3.1) of the Environmental Statement.

9.3.4.7 Whale and Dolphin Conservation also raised concerns regarding noise generation from piling and the longevity of the piling works, recommending that foundation types which require piling, specifically monopiles are avoided. Ørsted noted that Whale and Dolphin Conservation position on the use of monopile foundations, however based on the outcomes of assessment within the Environmental Statement, Ørsted does not consider such a stringent envelope requirement is merited. In order to reduce the potential underwater noise effect on marine mammals, Ørsted has committed to a number of measures within the Environmental Statement; volume 2, chapter 4: Marine Mammals (document reference number A6.2.4).

9.3.4.8 Natural England and the MMO raised concerns about disturbance from vessels, recommending that the cumulative physical disturbance from vessels be considered, and not just the acoustic disturbance. In response to concerns, Ørsted updated the Project Description (volume 1, chapter 3 (document reference number A6.1.3) of the Environmental Statement) to include a re-estimation of vessel traffic expected throughout the different stages of the Hornsea Three development. The cumulative effects from two piling vessels is discussed in volume 2, chapter 4: Marine Mammals (document reference number A6.2.4) of the Environmental Statement. The Marine Mammal Technical Report (volume 5, annex 4.1 (document reference number A6.5.4.1) of the Environmental Statement) was also updated to provide more detailed discussion on this topic. It was noted that Harbour Porpoise would move away from vessels. The number of vessels visiting the Hornsea Three site have been refined and timings provided for when the highest densities of vessels will be present.

Seal baseline characterisation and assessment

9.3.4.9 Natural England raised concerns regarding the assessment of the potential impact on seals and piling associated with the location of the offshore HVAC booster station. Natural England recommended that Ørsted assess data from other important grey seal sites, specifically Donna Nook and the North Norfolk Coastline (Blakeney and Horsey). Natural England also advised that Ørsted consider updating pupping and population figures for grey seals. Whale and Dolphin Conservation also raised concerns regarding potential under representation of population numbers for marine mammals within the assessment. In response to comments received, Ørsted updated abundance records for seals within volume 5, annex 4.1: Marine Mammals Technical Report (document reference number A6.5.4.1) of the Environmental Statement. Ørsted confirmed that the impacts to seals around Donna Nook and the north Norfolk coast haul out sites have been assessed based on the 'at sea usage' data. Regarding the location of the offshore HVAC booster station, the assessment demonstrated that even piling at the most southerly potential HVAC location would not result in any barrier effects to the haul out sites along the north Norfolk coast.

Consideration of Oil and Gas Seismic Activity

9.3.4.10 In their formal response, Natural England disagreed that seismic activity from oil and gas projects could be screened out as having no impact due to being part of the baseline. In response, Ørsted screened seismic activity into the EIA. It was not possible however, to source data from the BEIS oil and gas HRA, so this was substituted with the average number and extent of seismic surveys over the past four years within 10 km of the South North Sea cSAC summer area.

9.3.4.11 Further discussions relating to the concerns raised regarding marine mammals can be found in Annex 15 to this Consultation Report.

**9.3.5 Offshore Ornithology**

9.3.5.1 Ørsted consulted with a number of statutory and non-statutory stakeholders on matters relating to offshore ornithology. As part of the Evidence Plan process, the Offshore Ornithology EWG was established with representatives from the key regulatory bodies and their advisors and statutory nature conservation bodies, including the MMO, Natural England and the RSPB. The identification of key issues was informed by consultation on Hornsea Project One and Hornsea Project Two, where appropriate.

9.3.5.2 Following section 42 consultation on the PEIR under Phase 2.A, further meetings were held with the Offshore Ornithology EWG, which included discussions on the updated baseline characterisation following further collection of site specific survey data, and amendments to the impact assessment considering section 42 consultation responses. Updated draft assessment documents were circulated to the Offshore Ornithology EWG taking into account updates following the section 42 consultation, which were then discussed further.

9.3.5.3 The key issues raised relevant to offshore ornithology, which have been identified during the statutory consultation activities undertaken for Hornsea Three include;

- Baseline characterisation and survey methodology;
- Assessment methodology;
- Displacement assessment; and
- Collision risk modelling.

***Summary of feedback and Ørsted response***

Baseline characterisation and survey methodology

9.3.5.4 In their response to the Statutory Consultation (Phase 2.A), Natural England highlighted the limited extent of baseline data incorporated into the PEIR (April 2016 to February 2017). Natural England noted that due to the incomplete baseline survey data, there were a number of aspects of the assessments that were not presented in the PEIR and would need to be addressed in the Environmental Statement. Throughout the PEIR it was stated by the Applicant that the baseline characterisation of the Hornsea Three ornithological study area was ongoing and therefore the conclusions drawn throughout the PEIR were potentially subject to change.

9.3.5.5 Baseline surveys, consisting of 20 months of digital aerial survey, have been completed and the survey data incorporated into the ornithology assessments within the Environmental Statement. This was extended from the survey timeframe that was originally suggested during EWG meetings. Volume 5, annex 5.4: Data Hierarchy Report (document reference number A6.5.5.4) of the Environmental Statement provides additional consideration of existing ornithological data from across the former Hornsea Zone and explains how this has been used to inform the characterisation of the baseline environment. Uncertainty surrounding the baseline characterisation has been accounted for within the assessments conducted throughout the Offshore Ornithology EIA.

9.3.5.6 In addressing comments raised at the PEIR stage, Ørsted provided updated draft versions of the Ornithology chapter and annexes to the EWG prior to submission (when further survey data could be incorporated) to seek further feedback. Comments raised by consultees in response to the draft chapters are addressed in volume 2, chapter 5: Offshore Ornithology (document reference number A6.2.5) of the Environmental Statement.

Assessment methodology

9.3.5.7 In their original response to the Statutory Consultation (Phase 2.A), Natural England queried the methodology for determining LSE and therefore which species require an Appropriate Assessment (AA), as well as the methodology for identifying Valued Ornithological Receptors (VORs) for EIA. It was noted that there may be additional species that need to be included in the Collision Risk Monitoring (CRM) assessment. As stated above, twenty months of survey data has since been collected and incorporated into the assessments and no further species have been identified for inclusion. The processes used to identify species as VORs and then for inclusion in CRM are fully explained and applied in volume 5, annex 5.1: Baseline Characterisation Report (document reference number A6.5.5.1) and volume 5, annex 5.3: Collision Risk Modelling (document reference number A6.5.5.3) of the Environmental Statement.

9.3.5.8 Natural England raised concerns regarding the level of empirical evidence from which to define nocturnal activity factors for gannet and kittiwake. A review of the empirical evidence available for gannet and kittiwake in relation to nocturnal activity is presented in Appendix D of volume 5, annex 5.3: Collision Risk Modelling (document reference number A6.5.5.3) of the Environmental Statement. Ørsted considers there to be sufficient evidence to define empirically derived nocturnal activity factors for both gannet and kittiwake.

9.3.5.9 In their scoping response, Natural England advised that there was the potential for disturbance/displacement in the Hornsea Three array area and offshore cable corridor and in the near-shore and coastal areas along the offshore cable corridor and not just specifically the cable landfall site. In their formal response to the Statutory Consultation (Phase 2.A), Natural England advised that a range of values are taken through to the assessment of population impacts stage as this reflects the range of uncertainty around the predicted impact. Furthermore, they advised that displacement impacts calculated for individual seasons should be summed across seasons to allow assessment of the annual impact on the population.

Displacement assessment

9.3.5.10 In their response to the updated chapters provided following Statutory Consultation on the PEIR, Natural England continued to raise concerns regarding the range of displacement and mortality rates used in the assessments. In response to their concerns, a literature review was undertaken with the aim of identifying appropriate displacement and mortality rates to inform the displacement assessments. It is noted that assessments are based on the Project's understanding of the most appropriate situation to base the impact assessment upon. This review is presented in volume 2, chapter 5: Offshore Ornithology (document reference number A6.2.5) of the Environmental Statement.

9.3.5.11 Natural England also advised that displacement effects on fulmar should be included in the RIAA. The effects on fulmar are included in the RIAA (document reference number A5.2).

Collision Risk Modelling

9.3.5.12 In their response to the updated chapters provided following Statutory Consultation on the PEIR, Natural England highlighted that the assessments presented incorporated the use of collision risk estimates calculated using Band model options and avoidance rates that they did not agree with (e.g. use of the Extended model for gannet and kittiwake and the use of a 99.2% avoidance rate for kittiwake). A range of avoidance rates and Band model options are presented in annex 5.3: Collision Risk Modelling and these, alongside the variability associated with density data and flight height data, have been considered within the assessment presented in the Offshore Ornithology EIA. The assessment is based on the Project's understanding of the most appropriate situation to base the impact assessment upon.

9.3.5.13 Separate to the assessment process, following the PEIR, Ørsted made a number of refinements to the project envelope in response to feedback and ongoing design development. This included reducing the maximum number of turbines from 342 to 300, which has reduced the impact on a number of receptors, but was particularly introduced to reduce impacts on birds.

9.3.5.14 A summary of relevant responses relating to offshore ornithology can be found in Annex 15 of this Consultation Report (document reference number A5.1.15).

### 9.3.6 Commercial Fisheries

9.3.6.1 Ørsted consulted with a number of statutory and non-statutory stakeholders on matters relating to commercial fisheries including; Natural England, MMO, EIFCA and various UK and European Commercial Fisheries stakeholders.

9.3.6.2 The key issues raised relevant to commercial fisheries, which have been identified during the statutory consultation activities undertaken for Hornsea Three include;

- Impact on local fishing operations;
- Restricted access to array area;
- Impact from dredging;
- Assessment methodology; and
- Importance of coexistence.

#### **Summary of feedback and Ørsted response**

##### Impact on local fishing operations

9.3.6.3 In their response, EIFCA stated that the Hornsea Three offshore cable corridor and surrounding areas lie within extremely important fishing grounds, particularly for the UK potting industry. Several other consultees, including the WDFa and Norfolk County Council also raised concerns regarding the potential for Hornsea Three to cause disruption to local fishing activities and highlighted the importance of ensuring appropriate mitigation measures are put in place to reduce the impact on those fishing communities. The potential impact to local fishing fleets is considered in detail within volume 2, chapter 6: Commercial Fisheries (document reference number A6.2.6) of the Environmental Statement.

##### Restricted access to array area

9.3.6.4 EIFCA noted that vessels would be temporarily excluded across a '3.1 km<sup>2</sup> area along the Hornsea Three offshore cable corridor during the construction phase and suggest that this could lead to gear conflict and increased fishing pressure on adjacent grounds. Following the PEIR, the construction period and phasing for Hornsea Three was subsequently refined in response to feedback; however, Ørsted acknowledge that the works still require temporary exclusion from the area.

9.3.6.5 VisNed encouraged a pragmatic approach during construction keeping as much of the area open and no unnecessary closures for parts of the area where no construction is taking place, noting that closure of the whole area has a much larger impact on certain vessels and fishing communities than the Dutch demersal fleet. In the Environmental Statement; volume 2, chapter 6: Commercial Fisheries (document reference number A6.2.6), the exclusion scenarios for commercial fisheries during all phases of the development are described and it is concluded that exclusion will be limited to construction/maintenance activities and associated safety zones.

##### Impact from dredging

9.3.6.6 WDFa raised concerns regarding dredging and trenching activities and the impact this would have on shellfish, noting that such activities would cause alterations to the topography of the seabed and cause sand and chalk fines to be suspended in the water column for several miles. The potential impacts to crab and other shellfish resources including suspension of particles are considered in detail within volume 2, chapter 3: Fish and Shellfish Ecology (document reference number A6.2.3) of the Environmental Statement. This has informed the commercial fisheries EIA on the potential for displacement or disruption of commercially important fish and shellfish resources.

9.3.6.7 Following the PEIR, an alternative route in the nearshore area which would avoid the Cromer Shoal Chalk Beds MCZ was consulted on and subsequently adopted. The Hornsea Three offshore cable corridor now avoids known areas of chalk reef; however, the potential for fine chalk arising from routing across sub-cropping rock in the nearshore remains.

##### Assessment methodology

9.3.6.8 The NNFO noted that existing completed projects and other forms of marine management that have a bearing on fisheries should also be factored into the assessment, not just new and known future proposals. It should be noted that projects completed before or during the time period assessed within the baseline assessment (up to 2016) are considered to form part of the baseline. Projects completed post 2016 are not reflected in the baseline and are included within the cumulative assessment. Regulations pertaining to routine commercial fisheries management, including EU and UK fisheries legislation, including the Landing Obligation, are not considered plans or projects subject for assessment within the cumulative assessment. Further information on the assessment methodology is provided in the Environmental Statement, volume 1, chapter 5: Environmental Impact Assessment Methodology (document reference number A6.1.5) of the Environmental Statement.

9.3.6.9 In response to the Statutory Consultation on the PEIR (Phase 2.A), the NNFO noted that certain criteria including the Commercial Fisheries EIA would benefit from being separated into their own analyses. This was acknowledged by Ørsted and the criteria used for defining the sensitivity of the receptor and the magnitude of the impact were updated. Other issues raised included concerns regarding the methodology of the impact assessment, specifically the definitions for defining magnitude and the detail provided within justifications for assessing impact significance. The definitions have been updated in the Environmental Statement and further justifications including an assessment based on gravity based structure (GBS) foundations are provided in the Environmental Statement, volume 2, chapter 6: Commercial Fisheries (document reference number A6.2.6) of the Environmental Statement.

9.3.6.10 In their response, VisNed indicated a preference for the use of larger turbines for Hornsea Three, meaning greater spacing between turbines to create the best possible conditions for fishing in the Hornsea Three array area. The Hornsea Three project envelope allows for a minimum turbine spacing of 1,000 m. Following Statutory Consultation on the PEIR (Phase 2.A), Ørsted also reduced the maximum number of turbines from 342 to 300.

#### Importance of coexistence

- 9.3.6.11 In their response, the NFFO highlighted that the East Inshore and Offshore Marine Plan is aimed at maximising coexistence. It was noted at PEIR that under the maximum design scenario, floating foundations would restrict access to the array area during operation. In response to these concerns following the PEIR, Ørsted removed floating turbines from the project description. This resulted in gravity based structure foundations being assessed as the maximum design scenario.
- 9.3.6.12 Coexistence was noted as being fundamental to the commercial fisheries impact assessment. In response to concerns raised, Ørsted has committed to developing a Fisheries Co-Existence and Liaison Plan, which will be produced in collaboration with the NFFO and other fisheries representatives. An Outline of this document has been submitted with the application (document reference number A8.10). This is considered as part of the designed in mitigation measures for Hornsea Three. This includes appointing a Fisheries Liaison Officer (FLO) to act as primary point of contact for the fishing industry, and Onshore Fishing Industry Representative (FIR), who will act as a central point of contact within the fishing community and represents an unbiased view of fishing industry activity in the region within which the Hornsea Three array area and offshore cable corridor are located.
- 9.3.6.13 Designed-in measures adopted as part of Hornsea Three are detailed in volume 2, chapter 6: Commercial Fisheries (document reference number A6.2.6) of the Environmental Statement. Where significant impact has been identified, further measures related to mitigating disturbance as per FLOWW guidance have been proposed. The effects of construction activities will be highly dependent on the location of the fisheries exclusion zone. Further information is required on the proportion of the fleet that will be affected and the area that the fishery will be excluded from to assess the potential impacts and ensure appropriate action.
- 9.3.6.14 A summary of all relevant responses relating to commercial fisheries can be found in Annex 15 of this Consultation Report (document reference number A5.1.15).

### **9.3.7 Shipping and Navigation**

- 9.3.7.1 Ørsted consulted with a number of statutory and non-statutory stakeholders on matters relating to shipping and navigation including; the Maritime and Coastguard Agency (MCA), Trinity House, the Cruising Association (CA), the Royal Yachting Association (RYA) and the Chamber of Shipping.
- 9.3.7.2 The key issues raised relevant to shipping and navigation, which have been identified during the statutory consultation activities undertaken for Hornsea Three include:
- Turbine layout and impact on search and rescue;
  - Impact on surface navigation and other users; and
  - Offshore substation design and clearance risk.

#### **Summary of feedback and Ørsted response**

##### Turbine layout and impact on search and rescue activities

- 9.3.7.3 In response to the PEIR, the MCA and the CA raised concerns regarding the turbine layouts for Hornsea Three. Both the MCA and CA promoted straight line orientation to enable a “sea-through” passage and ensure safe navigation. The CA acknowledged that the minimum turbine spacing of 1,000 m and disorientation could be mitigated to an extent by internal marking and lighting. The MCA noted that the turbine layout will require MCA approval prior to construction to minimise the risks to surface vessels, including rescue boats, and Search and Rescue (SAR) aircraft operating within the site. Ørsted will use the Development Principles to define the layout post consent and will require the MMO to confirm in writing that they have been met.
- 9.3.7.4 Following the PEIR, Ørsted met with the MCA and Trinity House and advised them that Hornsea Three has committed to have a single line of orientation for turbine layouts. This was welcomed by Trinity House from a search and rescue perspective, as a positive step forward compared to the irregular layout as presented in the PEIR. Trinity House confirmed that they were generally content with the Development Principles; however, continued to have concerns over the 300 m micro siting and would like to see this reduced. Ørsted are still consulting with the MCA and TH on the Development Principles and this will continue throughout the application process.
- 9.3.7.5 The CA also noted that fewer, larger, turbines than a greater number of smaller turbines would be preferable (however would defer to MCA and Trinity House on this matter) and that the layout for Hornsea Three should be coordinated if possible with the former Hornsea Zone offshore wind farms. The Cumulative Effect Assessments (CEA) within volume 2, chapter 7: Shipping and Navigation (document reference number A6.2.7) of the Environmental Statement takes into consideration the impact associated with Hornsea Three together with other projects and plans. This include the proposed navigational corridor.

##### Impact on surface navigation and other users

- 9.3.7.6 The CA and others raised concerns about the routing of construction traffic to and from the construction site. The MCA and CA were supportive of safety zones limits during the construction, operation and maintenance, and decommissioning phases of Hornsea Three as set out in the PEIR, however the MCA requested that a detailed justification for the operational safety zone of 50 m is provided. Measures adopted as part of Hornsea Three are outlined in section 7.10 of this chapter and section 23 of the NRA and include a Cable Burial Risk Assessment (or similar), details on the application and use of safety zones and commitment to an ERCoP. Construction and operation traffic for Hornsea Three will be monitored and managed by a marine coordinator so that vessels do not impact on other users.

- 9.3.7.7 The RWS requested further information on the handling of ferries through the Hornsea Three array area. Ørsted has considered main routes, including ferry routes at both a base and future case level in the Environmental Statement; volume 2, chapter 7: Shipping and Navigation (document reference number A6.2.7) and in volume 5, annex 7.1: Navigational Risk Assessment (NRA) (sections 7.7 and 7.11.2) (document reference number A6.5.7.1), which also considers adverse weather routing.
- 9.3.7.8 Peel Ports Great Yarmouth noted in their response that vessel access to the Port should in no way be restricted as a result of the construction or operation of the wind farm or the presence of the export cables. Measures adopted as part of Hornsea Three are outlined in section 7.10 of volume 2, chapter 7: Shipping and Navigation (document reference number A6.2.7) and section 23 of volume 5, annex 7.1: NRA (document reference number A6.5.7.1) and include compliance with UK and Flag State regulations and IMO conventions and marine coordination. These mitigations will assist in ensuring that vessel traffic associated with Hornsea Three is safely and effectively managed and does not impact upon third party users.
- 9.3.7.9 The MCA noted in their response to the PEIR, that export cables, Cable Burial Protection Index and cable protections are issues that are yet to be fully developed. Any consented cable protection works must ensure existing and future safe navigation is not compromised. Measures adopted by Ørsted for Hornsea Three are outlined in volume 2, chapter 7: Shipping and Navigation (document reference number A6.2.7) and in section 23 of volume 5, annex 7.1: NRA (document reference number A6.5.7.1) of the Environmental Statement, and include a Cable Burial Risk Assessment (or similar), details on the application and use of safety zones and commitment to an Emergency Response and Cooperation Plan (ERCoP).
- 9.3.7.10 The MCA recommended that a study is undertaken, which establishes the electromagnetic deviation affecting vessels' compasses and other navigating system due to the export cable to the satisfaction of the MCA. Lessons learnt from previous offshore wind farm developments are provided in section 6 of volume 5, annex 7.1: NRA (document reference number A6.5.7.1), including electromagnetic interference trials undertaken at the North Hoyle offshore wind farm (MCA, 2005) and it was concluded that no further studies were considered necessary.

#### Offshore substation design and clearance risk

- 9.3.7.11 In response to the PEIR, Trinity House raised concerns over the structural design of the substations, as well as their locations and the proposed layout of turbines, and noted that they would welcome further consultation on these matters when details become available. In further meetings with Trinity House it was expanded that these concerns related to under keel clearance risk such structures may pose to deep draught vessels, particularly during the construction phase when the structures may not be fully lit and marked. An assessment of under keel clearance has been undertaken as part of the Environmental Statement (volume 2, chapter 7: Shipping and Navigation (document reference number A6.2.7)) and provides an overview of the key areas of risk identified throughout the Hornsea Three offshore cable corridor, including the offshore HVAC booster station search area. It is noted that substations are only under consideration for the offshore HVAC booster stations and not the substations located within the Hornsea Three array area.
- 9.3.7.12 Trinity House were supportive of the reduction in the size of the Hornsea Three offshore HVAC booster station search area and noted that any deviations required for the offshore HVAC booster station would be minimal. It was agreed that commercial vessels will not navigate within the Hornsea Three array area and that in the event of a SAR incident, a Hornsea Three vessel would likely be the first responder.
- 9.3.7.13 It is noted that removal of floating turbines and reduction in the maximum number of turbines as part of the changes made to Hornsea Three should also reduce the impact on shipping and navigation within the Hornsea Three array area.
- 9.3.7.14 A summary of relevant responses relating to shipping and navigation can be found in Annex 15 of this Consultation Report (document reference number A5.1.15).

### **9.3.8 Aviation, Military and Communications**

- 9.3.8.1 Ørsted consulted with a number of statutory and non-statutory stakeholders on matters relating to aviation, military and communications including; the MOD, the MCA, the Civil Aviation Authority (CAA), the Office of Communications (OfCOM), local ports and other infrastructure owners in the area.
- 9.3.8.2 The key issues raised relevant to aviation, military and communication, which have been identified during the statutory consultation activities undertaken for Hornsea Three include;
- Importance of lighting offshore structures for safety; and
  - Impact on operational activities of other asset owners.

### **Summary of feedback and Ørsted response**

#### Importance of lighting offshore structures for safety

9.3.8.3 In response to the PEIR, several consultees noted the importance of safety for aircrafts navigating around offshore structures associated with Hornsea Three. The MCA noted that the boundary turbines, where these are located more than 900 m apart, must be lit with a single 2,000, red aviation light, flashing Morse “W” in unison with all other boundary turbines. All other turbines must be fitted with a fixed single red 200 candela aviation light for SAR purposes. In response to the PEIR, the MOD requested that subject to verifying the precise location and height of structures above sea level, the structures are fitted with aviation warning lighting in order to maintain safety in relation to defence aviation activities even when there is no mandatory requirement for installation. This was acknowledged by Hornsea Three and in accordance with the recommendation in CAP764, Ørsted will continue to consult with the MOD to better understand their requirements. Hornsea Three will meet all the regulatory aviation lighting requirements and this is presented in the Environmental Statement; volume 2, chapter 8: Aviation, Military and Communication (document reference number A6.2.8).

#### Impact on operational activities of other asset owners

9.3.8.4 In their response to the PEIR under Phase 2.A, Centrica (now Spirit Energy) noted that helicopter operations to operational platforms within 5 km of the edge of Hornsea Three are identified as impacted. Centrica note that evacuation protocols may be compromised without suitable mitigation due to helicopters being the primary method of transporting personnel in the event of an emergency. Following the PEIR, Ørsted carried out further consultation with Centrica (now Spirit Energy) and CHC helicopters on the methodology used to assess access requirements to the Spirit Energy operated platforms. Helicopter access to the Spirit Energy operated platforms is assessed in full within the Environmental Statement; volume 2, chapter 8: Aviation, Military and Communication (document reference number A6.2.8) in paragraph 8.11.2.29 et seq.

9.3.8.5 A summary of all relevant responses relating to aviation, military and communication can be found in Annex 15 of this Consultation Report (document reference number A5.1.15).

### **9.3.9 Marine Archaeology**

9.3.9.1 Ørsted consulted with Historic England on matters relating to marine archaeology. As advised by PINS in the Scoping Opinion, Ørsted agreed survey protocols with Historic England to inform the marine archaeological chapter of the Environmental Statement.

9.3.9.2 Ørsted developed and issued a Marine Archaeology Road Map to Historic England which outlined the programme and approach to the EIA. This approach to consultation was discussed and agreed with Historic England at an initial meeting.

9.3.9.3 The key issues raised relevant to marine archaeology, which have been identified during the statutory consultation activities undertaken for Hornsea Three include;

- Impact on important offshore Palaeolithic deposits; and
- The impact on the North Sea War Channels.

### **Summary of feedback and Ørsted response**

#### Impact on important offshore Palaeolithic deposits

9.3.9.4 In their response to the Statutory Consultation on the PEIR (Phase 2.A), Historic England raised concerns about the resolution of geophysical surveys in terms of identifying feature/deposits of archaeological interest. Prior to the PEIR, Historic England had received and approved a Written Scheme of Investigation (WSI) for the geophysical surveys. The WSI is a plan detailing the protocol for any archaeological investigation to be carried out prior to the construction of Hornsea Three, including procedures for field surveys and watching briefs as may be required. During further discussions, Historic England confirmed that they accept the surveys undertaken to date and, as per the WSI, would be consulted on future scopes of work for Hornsea Three.

#### The impact on the North Sea War Channels

9.3.9.5 Historic England noted that the PEIR summarised a number of topographic features of archaeological interest, including Markham’s Hole and the area in the northern part of the Hornsea Three array area. Historic England concluded that significant deposits could be present in these areas and there is the potential for the impact of Hornsea Three to be significant in EIA terms. This was noted by Ørsted, however, given the widespread extent and depth of the palaeochannels and the relatively limited nature of the impacts by comparison (predicted to be local in spatial extent), the magnitude of impact is considered to be negligible.

9.3.9.6 In the PEIR, it was stated that there was the potential for prehistoric archaeology and noted the importance of evidence preserved within palaeochannels. Historic England agreed with the statements and conclusion that there is strong potential for the survival of site and material from the post-Devensian and Holocene periods and noted that any mitigation strategy would need to be subject to further discussion. They also noted that there is potential that organic-rich deposits may be recovered within the development area, which again would be subject to further discussion. This was noted by Ørsted and provision for archaeological input into future geotechnical surveys where deposits of know archaeological potential are likely to be affected have been included in the mitigation measures presented in volume 2, chapter 9: Marine Archaeology (document reference number A6.2.9) and volume 5, annex 9.2: Outline WSI (document reference number A6.5.9.2) of the Environmental Statement.

9.3.9.7 Historic England noted that the geophysical survey has identified a number of anomalies of interest and that it would be necessary for future documents to present a strategy of how the medium and low potential anomalies would be handled in terms of their mitigation. It was noted that additional studies may be required to further define Archaeological Exclusion Zones (AEZs).

9.3.9.8 A summary of all relevant responses relating to marine archaeology can be found in Annex 15 of this Consultation Report (document reference number A5.1.15).

### 9.3.10 Seascape and Visual

9.3.10.1 Ørsted consulted on matters relating to seascape and visual resources; including with Natural England, English Heritage and members of the public.

9.3.10.2 The key issues raised relevant to seascape and visual resources, which have been identified during the statutory consultation activities undertaken for Hornsea Three include:

- Cumulative impact on seascape character; and
- Visual impact of the offshore HVAC booster station.

#### **Summary of feedback and Ørsted response**

##### Cumulative impact on seascape character

9.3.10.3 The Hornsea Three array area where the turbines for Hornsea Three will be located, is over 120 km off the north Norfolk coast and therefore the turbines will not be visible from shore. However, during the consultation, concerns were raised by Natural England and others regarding the potential impact on seascapes, particularly the cumulative impact across the former Hornsea Zone. Ørsted has considered the cumulative effects on seascape character within section 10.13 of volume 2, chapter 10: Seascape and Visual Resources (document reference number A6.2.10) of the Environmental Statement, which concluded that all impacts on seascape and visual resources will be not significant (in EIA terms). Additionally, GIS data was provided to Natural England so that the Hornsea Three array area could be mapped for inclusion in any future revision of the National Seascape Character Area database.

##### Visual impact of the offshore HVAC booster station

9.3.10.4 Concerns were also raised regarding the visual impact of the offshore HVAC booster station, particularly the impact of lighting at night. Ørsted confirmed that light sources potentially visible on the offshore HVAC booster station had been assessed up to 25 km from the infrastructure within volume 2, chapter 10: Seascape and Visual Resources (document reference number A6.2.10) of the Environmental Statement. It was noted that the effects on landscape character and land based visual receptors is discussed in volume 3, chapter 4: Landscape and Visual Resources (document reference number A6.3.4) of the Environmental Statement, which concluded that all impacts on landscape and visual resources from the offshore HVAC booster station will be not significant (in EIA terms).

9.3.10.5 Following consultation on the PEIR, Ørsted continued to refine the design for Hornsea Three. This included reducing the maximum number of turbines within the project envelope from 342 to 300, which will reduce the impact on a number of offshore receptors including seascapes and visual resources. Furthermore, the search area for the offshore HVAC booster station was reduced, moving it further offshore.

9.3.10.6 A summary of all relevant responses relating to seascape and visual can be found in Annex 15 of this Consultation Report (document reference number A5.1.15).

### 9.3.11 Infrastructure and other users

9.3.11.1 Ørsted consulted with a number of statutory and non-statutory stakeholders on matters relating to infrastructure and other users including; the Oil and Gas Authority (OGA), Coal Authority, RYA, the CA, the British Marine Aggregate Producers Association (BMAPA) and relevant asset owners in the vicinity of the proposed works.

9.3.11.2 The key issues raised relevant to infrastructure and other users, which have been identified during the statutory consultation activities undertaken for Hornsea Three include;

- Location of the offshore HVAC booster station;
- Safety Zones;
- Impact on operations for other users; and
- Interaction with marine aggregate interests.

#### **Summary of feedback and Ørsted response**

##### Location of the offshore HVAC booster station

9.3.11.3 The CA raised concerns regarding the location of the offshore HVAC booster station and requested that it be placed as far northeast towards the Hornsea Three array area as possible. The location of the offshore HVAC booster station search area presented in this Environmental Statement (see Figure 11.1 of volume 2, chapter 11: Infrastructure and Other Users (document reference number A6.2.11) of the Environmental Statement) has been refined since the publication of the PEIR. The offshore HVAC booster station search area now occupies the central region of the offshore HVAC booster station search area presented in the PEIR. Volume 1, chapter 4: Site Selection and Consideration of Alternatives (document reference number A6.1.4) of the Environmental Statement presents further justification for this change.

##### Safety Zones

9.3.11.4 The CA noted that they supported the proposed safety zones during the construction, and operation and maintenance of Hornsea Three; however, anticipate that additional standard navigational marks may be needed. The lighting and marking of the offshore HVAC booster stations is presented in Table 11.27 of the Environmental Statement; volume 2, chapter 11: Infrastructure and Other Users (document reference number A6.2.11). It is noted that during operation Hornsea Three may apply for a 500 m safety zone around manned infrastructure (such as Offshore Accommodation Platforms) in order to ensure the safety of the individuals aboard. Hornsea Three may also apply for 500 m safety zones for infrastructure undergoing major maintenance (for example a blade replacement).

Impact on operations for other users

- 9.3.11.5 ConocoPhillips raised concerns regarding the potential implication to existing Marine Operation arrangements including Radar Early Warning System (REWS) and Emergency Response and Rescue Vessels (ERRV) used to monitor the approach of errant vessels to ConocoPhillips assets. Since the Murdoch platform REWS has an overlapping coverage with the Katy platform REWS (also operated by ConocoPhillips), which is considered to be outside the line of sight of the Hornsea Three array area, the Murdoch platform REWS was not considered within the EIA. The impact of Hornsea Three on the Saturn platform REWS was assessed in paragraph 11.11.2.67 and the effect of displaced shipping routes on ConocoPhillips assets was assessed in paragraph 11.11.2.80 of volume 2, chapter 11: Infrastructure and Other Users (document reference number A6.2.11) of the Environmental Statement. The REWS assessment concluded that the Hornsea Three array area is unlikely to affect the performance of the REWS on the Saturn platform. The displacement of shipping routes and the effect on ERRV is assessed in volume 2, chapter 7: Shipping and Navigation (document reference number A6.2.7) of the Environmental Statement.
- 9.3.11.6 In their formal response, Statoil raised concerns about the potential cross-over between the Sheringham Shoal and Hornsea Three export cables, noting that it must be managed so that Scira's asset integrity, availability and production capacity are maintained. In regard to potential cable crossing, cable crossing agreements are discussed in Table 11.27 of volume 2, chapter 11: Infrastructure and other users (document reference number A6.2.11) of the Environmental Statement.
- 9.3.11.7 Spirit Energy also encouraged greater discussion of the legal obligations on oil and gas companies to take the necessary steps to maximise the value of economically recoverable petroleum beneath UK waters. A discussion of oil and gas licencing is presented in the Environmental Statement within volume 2, chapter 11: Infrastructure and other users (document reference number A6.2.11) of the Environmental Statement.
- 9.3.11.8 Ørsted is proposing that mitigation measures shall be put in place to reduce the effect of Hornsea Three on the J6a platform REWS. The mitigation measures will be based on the mitigation measures identified for Hornsea Project Two for the Saturn platform and developed post consent in consultation with Spirit Energy.

Interaction with marine aggregate interests

- 9.3.11.9 Following consultation on the PEIR (Phase 2.A), two potential alternative offshore cable corridors were identified and Further Statutory Consultation (Phase 2.B) was undertaken on these alternatives. In response to the Phase 2.B consultation, the British Marine Aggregate Producers Association (BMAPA) noted that the supporting information provided for the alternative offshore cable corridor made no reference to potential interactions with existing marine aggregate interests (licensed/application/optioned). Existing marine aggregate interests are described in the Environmental Statement within section 11.7.8 of volume 2, chapter 11: Infrastructure and other users (document reference number A6.2.11) of the Environmental Statement. It is noted that restriction of access to marine aggregate extraction sites has been scoped out of the assessment on the basis that there are no marine aggregate extraction sites within the Hornsea Three array area or offshore cable corridor. Any restriction of access would therefore be associated with advisory safety distances around vessels carrying out export cable installation or maintenance activities, which would be temporary, transient and of limited spatial extent compared with the size of the aggregate areas.
- 9.3.11.10 A summary of all relevant responses relating to infrastructure and other users can be found in Annex 15 of this Consultation Report (document reference number A5.1.15).

## 9.4 Onshore

### 9.4.1 Geology and Ground Conditions

- 9.4.1.1 Ørsted consulted with a number of stakeholders on matters relating to geology and ground conditions; including Natural England, Environment Agency, the local authorities and Norfolk County Council.
- 9.4.1.2 The key issues raised relevant to geology and grounds conditions, which have been identified during the statutory consultation activities undertaken for Hornsea Three include:
- Impact on groundwater;
  - Impact on mineral safeguarding zones; and
  - Impact on designated sites (e.g. SSSI).

**Summary of feedback and Ørsted response**

Impact on groundwater

- 9.4.1.3 Natural England and the Environment Agency raised concerns regarding the impact on groundwater and the potential for sources to become contaminated, with the most sensitive areas being Source Protection Zones. Ørsted recognises the importance of safeguarding water quality, particularly within those areas defined as Source Protection Zone 1, where water is abstracted for drinking. Ørsted has sought to avoid areas identified as Source Protection Zone 1 in the final routing of the Hornsea Three onshore cable corridor within the 200 m wide corridor presented in the PEIR. Furthermore, if required to HDD within a Source Protection Zone 1, Ørsted has committed to carry out a hydrological risk assessment.

9.4.1.4 Natural England and the Environment Agency also raised concerns about the potential for cable trenches and other lines to act as preferential flow paths for groundwater, ultimately affecting the flow between surface water and ground water. Ørsted has considered the potential impacts of Hornsea Three in terms of creating preferential pathways within the Environmental Statement; volume 3, chapter 1: Geology and Ground Conditions (document reference number A6.3.1). Furthermore, an Outline CoCP forms part of the DCO application which contains management measures to minimise pollution including a commitment to prepare Pollution Prevention and Emergency Response Plans (document reference number A8.5). These will be secured under the DCO by a CoCP, which must be in accordance with the Outline CoCP which accompanies the DCO application (document reference number A8.5).

Impact on mineral safeguarding zones

9.4.1.5 In their response to the Statutory Consultation, Norfolk County Council raised concerns regarding the impact on Mineral Safeguarding Areas. These are areas designated by a Mineral Planning Authority which covers known deposits of minerals which are desired to be kept safeguarded from unnecessary sterilisation by non-mineral development. Through refining the width of the onshore cable corridor for Hornsea Three between PEIR and application, Ørsted has minimised the overall footprint and reduced the impact on these zones.

Impact on designated sites

9.4.1.6 At PEIR, Ørsted had presented a number of potential cable routes in the vicinity of the Hornsea Three landfall area that were being considered, including one which interacted with Kelling Heath SSSI. This raised some concerns, as it was noted that Kelling Heath SSSI is the best example of a glacial outwash plain in England and therefore is considered a site of geological importance. This was acknowledged by Ørsted and Kelling Heath SSSI was subsequently avoided through the adoption of the alternative route to the west. It should be noted that the alternative route was also informed by a number of other factors and where relevant, this change is noted in subsequent topic sections; including ecology and nature conservation (section 9.4.3).

9.4.1.7 A summary of all relevant responses relating to geology and ground conditions can be found in Annex 15 of this Consultation Report (document reference number A5.1.15).

**9.4.2 Hydrology and Flood Risk**

9.4.2.1 Ørsted consulted with a number of stakeholders on matters relating to hydrology and flood risk; including Natural England, Environment Agency, the local authorities, Norfolk County Council, Norfolk IDB (Internal Drainage Board), Norfolk Rivers Trust, Public Health England (PHE) and Anglian Water in respect to existing utilities in the area.

9.4.2.2 The key issues raised relevant to hydrology and flood risk, which have been identified during the statutory consultation activities undertaken for Hornsea Three include:

- Flood and drainage issues; and
- Impact on designated sites.

**Summary of feedback and Ørsted response**

Flood and drainage issues

9.4.2.3 A number of stakeholders including Norfolk County Council, the Environment Agency and members of the public raised concerns regarding the potential for Hornsea Three to increase the potential for flooding in areas. At the time of publishing the PEIR, Ørsted had not completed a Flood Risk Assessment (FRA) or prepared a Surface Water Drainage Strategy (SWDS), which are now included in the Environmental Statement (see volume 6, annex 2.1: Onshore Infrastructure Flood Risk Assessment (document reference number A6.6.2.1) of the Environmental Statement).

9.4.2.4 A number of people raised concerns specifically relating to the proposed site for the onshore HVDC converter/HVAC substation, noting that it has been subject to flooding previously. Although the permanent footprint for the onshore HVDC converter/HVAC substation has increased slightly as described in section 9.2.2.20, Ørsted has sought to minimise the non-permeable area for the onshore HVDC converter/HVAC substation and developed an outline drainage strategy (volume 6, annex 2.1: Onshore Infrastructure Flood Risk Assessment (document reference number A6.6.2.1) of the Environmental Statement), so that the substation will not add to the flood risk.

9.4.2.5 Norfolk County Council requested that further ground investigation work including infiltration testing together with an outline drainage design were included as part of the application. As noted above, outline drainage strategies have been prepared and are provided in Environmental Statement volume 6, annex 2.1: Onshore Infrastructure Flood Risk Assessments (document reference number A6.6.2.1) of the Environmental Statement. Detailed drainage provisions will be agreed with the relevant Lead Local Flood Authority (LLFA) and will be informed by infiltration testing to be undertaken during detailed design as part of the design of the Drainage Strategy.

Impact on designated sites

9.4.2.6 Both Natural England and the Norfolk Rivers Trust raised concerns regarding the potential for run off from open sites to enter designated rivers along the proposed onshore cable corridor. Comments have been taken into account and where practicable, mitigation measures have been identified to minimise flood risk during construction, minimise the generation of silt and prevent runoff entering the watercourses. These measures are outlined in volume 3, chapter 2: Hydrology and Flood Risk (Table 2.17) (document reference number A6.3.2) of the Environmental Statement and in the Outline CoCP (document reference number A8.5) which will form the basis for the approved CoCP post grant of the DCO.

9.4.2.7 The Environment Agency also raised concerns regarding the effects on watercourses and how the cables will be installed at these locations. In response to feedback and through ongoing design development, Ørsted identified and has committed in the DCO application to HDD at over seventy points along the onshore cable corridor, many of which are at river crossings including designated sites. This method of installation enables the cables to be installed without disturbing the surface infrastructure. Which watercourses were to be crossed by HDD was informed by a hydrological characterisation report which was prepared in agreement with the Onshore Ecology EWG following the EWGs request for further consideration of these matters and is presented within volume 6, annex 2.4: Hydrological Characterisation Report (document reference number A6.6.2.4) of the Environmental Statement. A WFD hydrological assessment has also been prepared in order to classify the potential water quality issues along the Hornsea Three onshore cable corridor and is presented within volume 6, annex 2.5: Water Framework Directive Surface Water Assessment (document reference number A6.6.2.5) of the Environmental Statement.

9.4.2.8 The Outline CoCP (document reference number A8.5), which has been prepared as part of the DCO application, which includes outline method statements for open cut crossings and bentonite break out plans for crossings using HDD methods. In consultation with the Environment Agency, Ørsted has agreed that there will be specific method statement for crossing the River Wensum which will be agreed with the Environment Agency ahead of any works commencing. Furthermore, certain designated sites including the Norfolk Valley Fens SAC have now been avoided through refinement of the Hornsea Three onshore cable corridor.

9.4.2.9 A summary of all relevant responses relating to hydrology and flood risk can be found in Annex 15 of this Consultation Report (document reference number A5.1.15).

### 9.4.3 Ecology and Nature Conservation

9.4.3.1 Ørsted consulted with a number of stakeholders on matters relating to ecology and nature conservation; including Natural England, Environment Agency, the local authorities, Norfolk County Council, TWT and NWT, the RSPB, Parish Councils and general public.

9.4.3.2 The key issues raised relevant to ecology and nature conservation, which have been identified during the statutory consultation activities undertaken for Hornsea Three include:

- Impact on designated sites;
- Impact on protected habitats; and
- Impact on protected species.

### Summary of feedback and Ørsted response

#### Impact on designated sites

9.4.3.3 In response to the PEIR, a number of stakeholders including TWT and Natural England, as well as members of the local community, raised concerns regarding the potential impact on designated sites, including SACs, SPAs, CWSs and SSSI. The Hornsea Three onshore cable corridor now avoids direct impacts on designated sites, either via avoidance (e.g. Kelling Heath SSSI, Norfolk Valley Fens SAC) or via HDD where avoidance is not practicable (e.g. River Wensum SAC). The final routing of the Hornsea Three onshore cable corridor and in-built mitigation has also considered the results of site specific ecology surveys, including bat flightpaths, great crested newts and reptiles, for example the corridor was moved away from woodland edges where higher levels of reptile occurrence was recorded.

9.4.3.4 Ørsted has also committed to over seventy HDD points along the Hornsea Three onshore cable corridor in the application, which enables Hornsea Three to install the cables under designated sites, such as the River Wensum SAC and other CWS and hedgerows where possible. The NWT also raised concerns regarding the potential impact of cable installation on Booton Common SSSI. Ørsted is proposing to HDD for approximately 340 m under Blackwater Drain and associated meadow and woodland habitat, therefore avoiding direct impacts on sensitive habitats from trenching. Importantly, with regard to HDDs, the Outline CoCP (document reference number A8.5) includes measures to minimise risks associated with HDD including a protocol for dealing with bentonite breakout, which will reduce risks to acceptable levels.

9.4.3.5 Specific concerns were raised by the TWT<sup>31</sup> and others regarding the potential impact on Kelling Heath SSSI, if the central of the three onshore cable corridors, near to the Hornsea Three landfall was taken forward. In response to concerns raised during the Phase 1.B consultation and other technical and environmental considerations, an alternative onshore cable corridor to the west of Kelling Heath SSSI (that had not been assessed) was consulted on alongside the PEIR during the Statutory Consultation (Phase 2.A). This alternative onshore cable corridor to the west of Kelling Heath was subsequently taken forward and the proposed final Hornsea Three onshore cable corridor now avoids all areas of heathland within or adjacent to Kelling Heath SSSI and Kelling Park CWS.

9.4.3.6 Norfolk County Council highlighted the need for maintaining ecological connectivity throughout the construction phases between the designated sites of Alderford Common SSSI, the River Wensum SAC and the area to the south. It was noted that this connectivity is particularly important for bats, as there are known bat roosts in the area, including those of Barbastelle bats in the woodland in Morton-on-the-Hill. In the Environmental Statement, it is confirmed that connectivity in this area would be maintained via the sections of HDD. Further details of how connectivity would be maintained between the designated sites named above to minimise disruption on bat populations in those area is included in volume 3, chapter 3: Ecology and Nature Conservation (document reference number A6.3.3) of the Environmental Statement.

<sup>31</sup> TWT issued a joint response with the Norfolk Wildlife Trust.

Impact on protected habitats

- 9.4.3.7 A number of consultees raised concerns regarding the potential impact on protected habitats including hedgerows and the River Wensum. In their joint response, Edgefield, Bodham, Corpusty and Saxthorpe, Hempstead and Plumstead Parish Councils (and others) highlighted the importance of protecting and preserving the natural environment and noted that best practices should be adopted to repair the effects of the development on the environment including reinstatement of habitats. East Carleton and Ketteringham and Swardeston Parish Councils noted that there are a number of trees within the pathway of the proposed onshore cable corridor and proposed site for the onshore HVDC converter/HVAC substation and requested that Ørsted minimise the impact on trees.
- 9.4.3.8 The final Hornsea Three onshore cable corridor has been selected to minimise losses of hedgerows and trees wherever practicable. Ørsted has also committed to restoring affected hedgerows after each phase. Where loss of hedgerows and trees is unavoidable, replacement planting with appropriate native species will be implemented. Furthermore, Ørsted has committed to hedgerow enhancement, so where species poor hedgerows are removed, these will be replaced with species rich hedgerows and where there is gapping of hedges it will be reinstated with a full hedge. Importantly, any hedgerow removal will be carried out sensitively and outside of nesting periods.
- 9.4.3.9 Through refinement and careful routing of the onshore cable corridor, Ørsted has sought to reduce the impact on local ecology through avoidance of designated sites where practicable, and where this is not possible using HDD to install the cables underneath these sites. As part of the refinement process and in response to feedback, Hornsea Three has reduced the maximum number of phases that Hornsea Three could be built out in from three to two, which will also reduce the impacts to ecological receptors previously noted.

Impact on protected species

- 9.4.3.10 In their response to the Statutory Consultation (Phase 2.A), the Environment Agency, Natural England and others raised concerns regarding the potential impact on protected species, including White Clawed Crayfish. As detailed in paragraph 9.4.3.4 of this Consultation Report, Ørsted has committed to HDD all significant watercourses including all those where White Clawed Crayfish populations are thought to be present.

- 9.4.3.11 Stakeholders also raised concerns regarding the potential impacts of invasive non-native species and disease on ecology and protected species, that could be transferred by the movement of people and equipment between sites. The Outline CoCP (document reference number A8.5) outlines measures to be taken, including a protocol for non-native species. Biosecurity measures are also summarised in volume 3, chapter 3: Ecology and Nature and Conservation (document reference number A6.3.3) of the Environmental Statement and set out in the Outline Ecological Management Plan (EMP) that accompanies the DCO application (document reference number A8.6). The Outline EMP sets out principles for how the site and its operations will be managed in such a way so as to protect and enhance the biodiversity and ecology of the site and surrounding area and will be further developed and agreed with the local authorities prior to construction commencing.
- 9.4.3.12 In their response, the RSPB noted that pink-footed geese foraging for sugar beet near the Hornsea Three intertidal area is a key concern in relation to Hornsea Three. Natural England agreed that overwintering pink-footed goose should be considered further in the EIA and HRA and advised on a number of possible mitigation measures. In response to this issue, Ørsted have proposed to a two staged approach to mitigation. The first stage would be to confirm the need for this (depending on construction programme and crop rotation in relevant construction years). If a need for mitigation is demonstrated, then a mitigation plan would be produced in consultation with Natural England. Ørsted also confirmed that bird scarers proposed at PEIR to deter ground nesting birds will not be used in the area that could support pink-footed geese in the early part of the potential breeding season as per the RSPB's request.
- 9.4.3.13 In their response, the RSPB and others also encouraged Ørsted to consider other ways to recreate habitat that will provide enhancements for wildlife. Ørsted has considered this and a number of measures are outlined in the Outline EMP (document reference number A8.6), including hedgerow enhancement.
- 9.4.3.14 A summary of all relevant responses relating to onshore ecology can be found in Annex 15 of this Consultation Report (document reference number A5.1.15).

**9.4.4 Landscape and Visual Resources**

- 9.4.4.1 Ørsted consulted with a number of stakeholders on matters relating to landscape and visual resources; including the local authorities, Norfolk County Council, the Norfolk Coast Partnership, Parish Councils and members of the public.
- 9.4.4.2 The key issues raised relevant to landscape and visual resources, which have been identified during the statutory consultation activities undertaken for Hornsea Three include;
- Visual impact from the onshore/offshore HVAC booster stations;
  - Visual impact from the onshore substation; and
  - Impact from construction and operation lighting.

### **Summary of feedback and Ørsted response**

- 9.4.4.3 In the PEIR, Ørsted explained that the onshore export cables for Hornsea Three would be buried underground rather than using overhead pylons. Once installed the land above the cables and that which was used for temporary compounds would be reinstated; however, both the onshore HVAC booster station and onshore HVDC converter/HVAC substation would be permanent above ground structures.
- 9.4.4.4 In response to the PEIR and indicative visualisations prepared for the Phase 2.A community consultation events, a number of stakeholders, including the local authorities, Parish Councils, local community groups and residents raised concerns regarding the scale of the infrastructure associated with Hornsea Three and the potential for these sites to negatively impact the rural landscape and Norfolk Area of Outstanding Natural Beauty (AONB), with many noting that these types of structures would look out of place in a rural setting. It was acknowledged by Ørsted at that stage, that no visual mitigation had been proposed at the sites, as detailed assessments based on designs had yet to be carried out. Many consultees noted that appropriate mitigation would be essential and that this should be sympathetic to the rural landscape.
- 9.4.4.5 Ørsted has since undertaken a Landscape and Visual Impact Assessment (LVIA) and this is presented in the Environmental Statement; chapter 3, volume 4: Landscape and Visual Resources (document reference number A6.3.4). In preparing this assessment, Ørsted consulted with the local authorities, Norfolk County Council and the Norfolk Coast Partnership on the methodology; including the type, number and format of the visualisations. It was recognised that this was an important issue locally and that any proposed mitigation measures would need to be appropriate for the setting and be sensitive to local receptors. In response to concerns, Ørsted has worked closely with appointed landscape architects to interpret the results of the LVIA and to develop plans for visual mitigation at these sites and across the onshore cable corridor.
- 9.4.4.6 The onshore HVAC booster station and onshore substation lie within different landscapes and are different in terms of, inter alia, scale and appearance. Therefore, in addition to the generic objectives set out in the Environmental Statement, volume 3, chapter 4: Landscape and Visual Resources (document reference number A6.3.4), the design principles for mitigation are specifically designed to respond to the proposals and contexts for each development. A brief description of the proposed mitigation for each site is provided below and this is further illustrated in the Outline Landscape Management Plan (LMP) (document reference number A8.7).

### Visual impact of the onshore HVAC booster station

- 9.4.4.7 The onshore HVAC booster station is located close to existing woodlands and in a local low point in the landscape, which means that it will be largely screened in views from the east, and seen with a woodland backdrop in views from the west. As detailed in section 9.2.2.19 above, the orientation of the onshore HVAC booster station has also been shifted to maximise existing screening from hedgerows and woodland. As part of the Outline LMP (document reference number A8.7), Ørsted is proposing to enclose the onshore HVAC booster station with a mixed wood, which will appear as an extension to the existing woods to the east. The proposed mitigation is appropriate to local landscape character and will help to screen and filter views of the onshore HVAC booster station infrastructure from surrounding landscape and visual receptors, and integrate it into its landscape context.
- 9.4.4.8 Along the line of the Hornsea Three onshore cable corridor, a strip of mature trees and scrub along the field boundary immediately north of the onshore HVAC booster station, and hedgerows bounding fields further to the north and to the south, are to be retained by installation of cables by HDD. Ørsted is also proposing to create areas of new woodland and scrub, and new and strengthened hedgerows with hedgerow trees at strategic locations to provide further screening and filtering of views and to enhance landscape character.

### Visual impact from the onshore HVDC converter/HVAC substation

- 9.4.4.9 In their response, Swardeston Parish Council and residents, noted that a number of trees and hedgerows exist within the onshore HVDC converter/HVAC substation footprint and suggested that these be retained to support screening of the onshore HVDC converter/HVAC substation. Ørsted have retained a proportion of the existing hedgerows and hedgerow trees along the Hornsea Three onshore cable corridor and, where possible, at the site boundaries of the onshore HVDC converter/HVAC substation by committing to the use of HDD. However, it is noted that there will be locations both along the onshore cable corridor and at the boundaries of the substation where hedges and trees will need to be removed to facilitate construction and/or operation. This includes, for example, areas such as the proposed site entrance to the substation.
- 9.4.4.10 In order to enhance the screening of the HVDC converter/HVAC substation, new woodland and scrub planting is proposed around the perimeter of the site. This will be appropriate to the local landscape character, utilising native species, and will help to screen and filter views of the onshore HVDC converter/HVAC substation from the surrounding landscape and visual receptors.
- 9.4.4.1 Additionally, Ørsted is proposing to replace all hedgerows which have been removed along the onshore cable corridor and strengthen other existing hedgerows (including those close to the HVDC converter/HVAC substation) by planting gaps with new hedge plants and where possible, hedgerow trees, that will provide further screening and filtering of views and enhance landscape character.

9.4.4.2 South Norfolk District Council raised concerns regarding the potential impact that the onshore HVDC converter/HVAC substation may have on the Norwich approach and Norwich Southern Bypass Landscape Protection Zone (NSBLPZ) and the Undeveloped Approach to Norwich, including the B1113, which is part of local planning policy. In response to concerns, the proposed landscaping for the onshore HVDC converter/HVAC substation has been designed to minimise harm to the NSBLPZ around the southern bypass (A47) and, where possible, enhance the landscape setting of the southern bypass. It is noted that existing open views of countryside looking south across the site from the A47 will be obscured by the onshore HVDC converter/HVAC substation. However, the onshore HVDC converter/HVAC substation will be set back from the A47 and Ørsted is proposing the plant a belt of woodland between the substation and the road. This will, as planting matures, create a view of woodland in the foreground with the onshore HVDC converter/HVAC substation beyond. A permanent gap will be required at the site entrance on the B1113, but its width will be the minimum required for construction and operation to maximise screening of the onshore substation.

9.4.4.3 It is noted that the residents closest to the onshore HVDC converter/HVAC substation have raised concerns regarding the proximity of the onshore HVDC converter/HVAC substation and the impact that this will have on their view. In response to these concerns, Ørsted has undertaken a residential amenity assessment (volume 6, annex 4.6: Residential Visual Amenity (document reference number A6.6.4.6) of the Environmental Statement) which has informed the identification of locations for strategic landscaping near to the onshore HVDC converter/HVAC substation consisting of potential tree planting within the edges of fields adjacent to residential properties to the southwest and southeast to provide additional screening. This will be offered as optional mitigation, to be taken forward should residents wish this, and it is not essential to mitigate the effects<sup>32</sup>.

#### Impacting from construction and operation lighting

9.4.4.4 Residents close to the onshore HVAC booster station, onshore HVDC converter/HVAC substation and main construction compounds raised concerns regarding the potential impact from artificial lighting during construction and operation of Hornsea Three. Lighting during construction will take into account guidance from the Institute of Lighting Professionals ('Guidance Notes for the Reduction of Obtrusive Light' (Institute of Lighting Professionals, 2011)). Lighting during the onshore construction phase will be short term and temporary, used only when required (and generally limited to certain working hours) and designed to avoid unnecessary illumination. Light spill during out of hours working will be minimised through the use of task-orientated lighting.

9.4.4.5 At permanent onshore infrastructure (e.g. onshore HVAC booster station and onshore HVDC converter/HVAC substation), security lighting may be required during operation to ensure a safe working environment. Light spill from these elements would be minimised through design, for example the use of directional lighting. Further details on the lighting strategy for temporary works and permanent infrastructure (onshore and offshore) is set out in the Environmental Statement; volume 1, chapter 3: Project Description (document reference number A6.1.3), and in the Outline CoCP (document reference number A8.5).

9.4.4.6 A summary of all relevant responses relating to landscape and visual resources can be found in Annex 15 of this Consultation Report (document reference number A5.1.15).

### **9.4.5 Historic Environment**

9.4.5.1 Ørsted consulted with a number of stakeholders on matters relating to the historic environment; including Historic England, Norfolk County Council and the local authorities.

9.4.5.2 The key issues raised relevant to the historic environment, which have been identified during the statutory consultation activities undertaken for Hornsea Three include;

- Impact on designated heritage assets (e.g. listed buildings and registered parks and gardens); and
- Impact on non-designated heritage assets (e.g. archaeological finds).

#### ***Summary of feedback and Ørsted response***

##### Impact on designated heritage assets

9.4.5.3 In response to the PEIR, Historic England raised concerns about the proximity of the Hornsea Three onshore cable corridor to designated heritage assets; including Baconsthorpe Castle and several designated sites at Salle, including a Grade I listed church. In response to consultation feedback and design refinement, the Hornsea Three onshore cable corridor has been altered to run further to the west at Salle. It now passes 110 m from Salle Park at its nearest point, thus avoiding the relationship between the listed church and registered park and garden.

9.4.5.4 Historic England noted the significance of the associated mere and moat at Baconsthorpe Castle and sought reassurance from Ørsted that excavations on adjacent land would not result in a change to the hydrology of the area which would change the setting of the asset. The effect, if any on the hydrology along the Hornsea Three onshore cable corridor is described in volume 3, chapter 2: Hydrology and Flood Risk (document reference number A6.3.2) of the Environmental Statement. It concluded that there would be no effect on the hydrology of the moat at Baconsthorpe Castle.

<sup>32</sup> It is noted that some residents may prefer to retain the openness of views (including some visibility of the onshore substation) rather than having a tree belt close to their house.

9.4.5.5 In their response, South Norfolk District Council highlighted the importance of Keswick Hall, Gowthorpe Manor House and Mangreen Hall and noted that the onshore HVDC converter/HVAC substation, if visible, could harm the isolated nature and setting of these designated heritage sites. Ørsted has considered the impact on these sites within the Environmental Statement; volume 3, chapter 5: Historic Environment (document reference number A6.3.5) and has proposed a number of mitigation measures including restoration of hedges and hedge banks and a dedicated landscape planting scheme around the onshore HVDC converter/HVAC substation and onshore HVAC booster station (see Outline LMP, document reference A8.7), which will reduce long-term effects on the settings of heritage assets and the historic landscape.

Impact on non-designated heritage assets

9.4.5.6 In their response, Historic England noted that the Hornsea Three onshore cable corridor crosses several small rivers, noting that floodplains have a high potential for the recovery of archaeological finds. They recommend that these areas are identified in the Environmental Statement and a strategy for their evaluation addressed in a WSI. An assessment of these areas, with an outline mitigation strategy is provided in the Environmental Statement; volume 3, chapter 5: Historic Environment (document reference A6.3.5). Investigation of unexpected archaeological sites encountered during the construction of Hornsea Three will be undertaken in line with procedures (e.g. a chance find procedure) agreed in advance with the relevant authorities (see Outline CoCP, document reference number A8.5). It is noted that no onshore WSI has been produced at this stage, however a WSI will be produced prior to the commencement of any consented works.

9.4.5.7 A summary of all relevant responses relating to the historic environment can be found in Annex 15 of this Consultation Report (document reference number A5.1.15).

**9.4.6 Land Use and Recreation**

9.4.6.1 Ørsted consulted with a number of stakeholders on matters relating to land use and recreation; including landowners, the local authorities, Norfolk County Council, the Norfolk Coast Partnership, the Friends of North Norfolk and various bodies representing landowner interests along the Hornsea Three onshore cable corridor.

9.4.6.2 The key issues raised relevant to land use and recreation, which have been identified during the statutory consultation activities undertaken for Hornsea Three include;

- Impact on PRow;
- Impact on agricultural land and management of reinstatement post works; and
- Impact on drainage and irrigation systems.

**Summary of feedback and Ørsted response**

Impact on PRow and other land uses

9.4.6.3 A number of stakeholders raised concerns about access to PRow along the Hornsea Three onshore cable corridor during the onshore construction period. In the Environmental Statement (volume 3, chapter 6: Land Use and Recreation (document reference number A6.3.6), it is confirmed that no PRow would be permanently closed during the construction of Hornsea Three. The cables will either be installed using HDD or open cut trenching, and if open cut trenching is used, temporary diversion/management measures would be put in place and agreed with the relevant local authority in advance of the works commencing. Importantly, residents and parish councils would be informed in advance of any potential works and diversions (if required).

9.4.6.4 In response to the PEIR, a number of stakeholders expressed concerns that construction works at the Hornsea Three landfall area could result in temporary closure of the Norfolk Coastal Path. To ensure that the coastal path can remain open, since consulting on the PEIR, Ørsted has identified and consulted on a potential footpath diversion as part of the Further Statutory Consultation (Phase 2.B), which is included in the application.

9.4.6.5 In response to feedback, Ørsted has also considered other land uses and has sought to minimise the impact on these where possible, including moving the Hornsea Three onshore cable corridor further away from campsites and holiday parks where feasible and particularly where other potential technical or environmental issues are a factor.

Impact on agricultural land and management of reinstatement post works

9.4.6.6 The potential for Hornsea Three to negatively impact agricultural practices across Norfolk, particularly the best and most versatile agricultural land, was raised by several stakeholders, including Norfolk County Council, landowners and agricultural bodies representing landowner interests, including the NFU and CLA.

9.4.6.7 Ørsted recognises that Norfolk is an area of high agricultural value and through consultation has sought to take on board landowner feedback in respect of the Hornsea Three onshore cable corridor boundary and construction methods to minimise disruption to their farming activities where possible. Landowner feedback has directly fed into the onshore cable corridor route refinement process from the 200 m wide onshore cable corridor presented at Phase 2.A to the final 80 m wide onshore cable corridor presented in the Environmental Statement. This includes aligning the onshore cable corridor with the edges of fields to minimise impact on farming operations and using cut off sections of fields, which otherwise would have been redundant as storage areas where required. Landowner feedback has also been pivotal in driving some of the onshore cable corridor iterations post PEIR, which extended outside of the Statutory Consultation boundary (Phase 2.A), and were subsequently consulted on under Phase 2.B and Phase 2.C.

9.4.6.8 Importantly, a Schedule of Condition will be taken prior to the works commencing and Ørsted has an obligation to return the land in the same state. Reasonable crop loss, unfarmable land during construction and disturbance payments will be assessed and compensated on a proven loss basis. There will also be plans for soil management, weed management and bio-security, to reduce the impact on the quality of the land and an Agricultural Liaison Officer (ALO) will be appointed during the construction period to advise and to deal with post-construction claims.

Impact on drainage and irrigation systems

9.4.6.9 Several landowners raised concerns about the potential impact on existing drainage and irrigation systems where these interact with the onshore cable corridor. The final Hornsea Three onshore cable corridor has been routed to avoid irrigation ponds and reservoirs. Furthermore, Ørsted has sought further information in consultation with landowners, for example through requesting drainage plans. To ensure that land is properly managed and reinstated, Ørsted will appoint a Drainage Consultant to assess and design a mitigation scheme; pre-construction, during construction and post-construction in terms of repair.

9.4.6.10 A summary of all relevant responses relating to land use and recreation can be found in Annex 15 of this Consultation Report (document reference number A5.1.15).

**9.4.7 Traffic and Transport**

9.4.7.1 Ørsted consulted with a number of stakeholders on matters relating to traffic and transport; including Highways England, the local Highways Authority (Norfolk County Council), Parish Councils and members of the local community.

9.4.7.2 The key issues raised relevant to traffic and transport, which have been identified during the statutory consultation activities undertaken for Hornsea Three include;

- Suitability of and impacts to the local road network; and
- Access to and from construction sites.

***Summary of feedback and Ørsted response***

Suitability and impacts to the local road network

9.4.7.3 The suitability of the local road network across Norfolk has been raised by a number of local stakeholders, with many highlighting issues experienced with other developments in the areas. Several stakeholders have noted constraints at the Hornsea Three landfall area near Weybourne and raised concerns regarding road safety, particularly relating to HGV movement and access to the various construction compounds.

9.4.7.4 Many members of the local community raised concerns regarding the impact on traffic locally during the construction period. It was explained at PEIR that the haul road running along the length of the Hornsea Three onshore cable corridor would be used as much as possible to reduce the pressure on the local road networks. Furthermore, since PEIR, Ørsted has identified over seventy HDD sites along the Hornsea Three onshore cable corridor, including all major roads which avoid the needs for any roads closures. Certain smaller tracks may be crossed using open cut trenching, however; where this is the case suitable diversions will be put in place in discussion with the local authority and properties directly impacted.

9.4.7.5 Ørsted recognises that there are some constraints in the local road network, however this will be managed for Hornsea Three through a Construction Traffic Management Plan, an outline of which is included in the DCO application (document reference number A8.2). Furthermore, steps will be taken to ensure there is no lasting impact on the condition of local roads. This includes video condition surveys, which will be undertaken prior to and post works on minor links to identify any requirements for road condition management and inclusion of wheel washing facilities at site entrances and exits to minimise the potential for debris to be transported to roads from the site.

Access to and from construction sites

9.4.7.6 In response to the Statutory Consultation, several members of the local community near to the onshore HVDC converter/HVAC substation raised concerns regarding potential access to the site during construction, noting that the B1113 is the main road into Norwich and is already busy at peak times. Many stated that access to the onshore HVDC converter/HVAC substation site should be from the A47. In response, to these suggestions, Ørsted raised this with Highways England during informal discussions; however, it was confirmed that Highways England would not support such a proposal.

9.4.7.7 A summary of all relevant responses relating to traffic and transport can be found in Annex 15 of this Consultation Report (document reference number A5.1.15).

**9.4.8 Noise and Vibration**

9.4.8.1 Ørsted consulted with a number of stakeholders on matters relating to noise and vibration; including the local authorities, Norfolk County Council and members of the local community.

9.4.8.2 The key issues raised relevant to noise and vibration, which have been identified during the statutory consultation activities undertaken for Hornsea Three include;

- Noise impact from the construction and operation of the onshore HVDC converter/HVAC substation and onshore HVAC booster station; and
- Noise impact from wider construction activities.

**Summary of feedback and Ørsted response**

Noise impact from onshore HVAC converter/HVAC substation and onshore HVAC booster station

- 9.4.8.3 In their response to consultation on the PEIR, the local councillor strongly urged Norfolk County Council to insist that mitigation measures are included as part of the application for Hornsea Three in respect of the height, visibility and noise relating the onshore HVAC booster station at Little Barningham. Indicative layouts of the onshore HVAC booster station and onshore HVDC converter/HVAC substation have been assessed as part of the EIA and a noise threshold has been identified below which significant effects would not occur. Designed in mitigation measures are included Table 8.21 within volume 6, annex 8.4: Operational Noise Model Output (document reference number A6.6.8.4) of the Environmental Statement. An operational Noise Management Plan would be prepared post consent.
- 9.4.8.4 This indicative layout/design has been modelled in the absence of detailed design, however the mitigation has been identified in such a way that even if the chosen layout or design would result in a greater noise at source (under unmitigated scenario), sufficient mitigation would be put in place to maintain impacts that are not materially different or greater.
- 9.4.8.5 North Norfolk District Council noted in their response to the PEIR, that they welcomed the proposal to screen the HVAC booster station, noting that the District Council would expect opportunities to enclose the site in woodland planting to be explored so as to help address potential noise impacts associated with these facilities. Although it was noted that the Council's Environmental Protection Manager remains confident that the noise levels from equipment and cooling fans at the HVAC booster station can be reduced to a position there would be minimal impact on the local community. Details of the landscape planting are provided in the Outline Landscape Management Plan which accompanies the DCO application (document reference A8.7). The effect of screening due to the proposed landscape planting has not been included in the operational noise model to ensure a maximum design scenario is assessed. The indicative layout of the HVAC booster station assumes that the equipment will be enclosed and this further detailed in volume 6, annex 8.3: Operational Noise Model Input (document reference number A6.6.8.3) of the Environmental Statement, with the results of the noise assessment presented in volume 6, annex 8.4: Operational Noise Model Output (document reference number A6.6.8.4).

Noise impact from wider construction activities

- 9.4.8.6 In their response to the PEIR consultation, the local authorities noted that noise from construction activities, including HDDs and movement of construction vehicles could impact residents living close to the proposed works. The local authorities recognised that the PEIR outlined measures that will be taken to address this issue, but noted that the detail would need to be agreed at the appropriate time. Since the PEIR was published the construction model has been refined to include construction traffic flows and further information on the construction process and location and use of compounds and as a result, the assessment of noise impacts is more detailed in the Environmental Statement (volume 3, chapter 8: Noise and Vibration, document reference number A6.3.8).

- 9.4.8.7 The proposed location of the HDDs and predicted noise and vibration levels are identified in volume 6, annex 8.2: Construction Noise Model Output (document reference number A6.6.8.2). Mitigation measures such as core working hours are set out in the Outline CoCP (document reference number A8.5). More detailed construction noise management measures will be agreed with the relevant local authorities prior to the start of construction.
- 9.4.8.8 Broadland District Council raised specific concerns relating to increased vehicular activity associated with construction phases of the onshore cable route including the removal of excavated material and delivery of large sections of cables. The PEIR did not assess the noise impacts from the compound or the alternative cable corridor west of Salle Park. The onshore cable corridor has been refined since the PEIR and the alternatives have been incorporated. The approach to the use of construction compounds has been developed and is detailed in Environmental Statement volume 1, chapter 3: Project Description (document reference number A6.1.3). Noise impacts caused by traffic movements including at the compounds are assessed in volume 3, chapter 8: Noise and Vibration (document reference number A6.3.8) and in volume 6, annex 8.2: Construction Noise Model Output (document reference number A6.6.8.2). The Outline CoCP (document reference number A8.5) also identifies proposed working hours and standard management measures.
- 9.4.8.9 A summary of all relevant responses relating to noise and vibration can be found in Annex 15 of this Consultation Report (document reference number A5.1.15).

**9.4.9 Air Quality**

- 9.4.9.1 Ørsted consulted with a number of stakeholders on matters relating to air quality; including the local authorities, Norfolk County Council and Natural England.
- 9.4.9.2 The key issue raised relevant to air quality, identified during the statutory consultation activities undertaken for Hornsea Three, was the impacts from dust generation from construction activities.

**Summary of feedback and Ørsted response**

- 9.4.9.3 In response to the PEIR, South Norfolk District Council and Natural England raised concerns over the potential for dust generated during the construction phase, particularly in dry windy weather. Natural England noted that dust is not only a potential issue in itself, but also may carry nutrients and pollutants, similarly to runoff, which could have greater impact on ecological receptors than the dust per se and this should be recognised. Furthermore, where dust settles it will have the potential to run off into watercourses with impacts as for run off, but potentially away from any mitigation or monitoring and so onsite control, including all exposed soils, will be vital.

9.4.9.4 The air quality assessment has noted that Hornsea Three is within close proximity to five ecological statutory designated sites and has classified the surrounding area as highly sensitive as part of the impact assessment on ecological receptors. Mitigation measures have been derived from guidance published by the Institute of Air Quality management and tailored for Hornsea Three (see volume 3, chapter 9: Air Quality, document reference number A6.3.9). The IAQM guidance states that with good dust management and mitigation practises implemented, the residual effects will normally be reduced to a level that is "not significant". All of the mitigation measures relate to methods of preventing dust (and associated nutrients/pollutants) from leaving the site.

9.4.9.5 South Norfolk District Council note that the PEIR outlines measures that will be taken to address the issue which are considered acceptable but the details will need to be agreed at the appropriate time. Mitigation applied in the air quality assessment has been derived from guidance published by the Institute of Air Quality management (IAQM), and tailored for Hornsea Three. The IAQM guidance states that with good dust management and mitigation practises implemented, the effects will be reduced to a level that is "not significant" these measures will be implemented through the Outline CoCP (document reference number A8.5).

9.4.9.6 A summary of all relevant responses relating to air quality can be found in Annex 15 of this Consultation Report (document reference number A5.1.15).

#### 9.4.10 Socio-economics

9.4.10.1 Ørsted consulted with a number of stakeholders on matters relating to socio-economics; Norfolk County Council, local authorities, Local Enterprise Partnerships, local business groups and members of the community.

9.4.10.2 The key issues raised relevant to socio-economics, which have been identified during the statutory consultation activities undertaken for Hornsea Three include;

- Maximising local benefits;
- Use of local Ports and facilities; and
- Impact on tourism receptors.

#### **Summary of feedback and Ørsted response**

##### Maximising local benefits

9.4.10.3 In response to consultation on the PEIR, a number of stakeholders, including the local authorities, Norfolk County Council, Parish Councils and members of the community highlighted the importance of maximising the potential benefits associated with Hornsea Three, including jobs and opportunities particularly in the construction phase for local businesses. Ørsted has assessed the impacts on socioeconomics in the Environmental Statement, volume 3, chapter 10: Socio-economics (document reference number A6.3.10). Alongside the assessment, examples are also provided of how Ørsted has sought to maximise local benefits on other UK wind farm projects. This includes engaging with the relevant Local Enterprise Partnership (LEP) and business groups to understand what can be delivered locally and ensuring that local businesses and communities are made aware of the opportunities available to them. Typically, Ørsted will hold "meet the buyer" events with tier 1 and tier 2 contractors, which provide an opportunity for relationships to be formed between these top tier suppliers and local businesses. Ørsted has committed to producing a Skills & Employment Plan which will outline some of these measures in more detail.

##### Use of local Ports and facilities

9.4.10.4 A number of stakeholders, including Norfolk County Council and members of the local community asked whether Ørsted would be using local ports to construct and operate Hornsea Three. The use of Great Yarmouth Port, alongside others, has been considered in the socioeconomics chapter of the Environmental Statement (volume 3, chapter 10; document reference number A6.3.10). It is noted that a decision on which port(s) to use, will not be made until post consent, when detailed discussions have taken place with potential suppliers.

##### Impact on tourism receptors

9.4.10.5 In response to the PEIR, the local authorities and members of the local communities, including various businesses raised concerns regarding the potential impact on tourism across Norfolk, noting that Norfolk's the main attraction is its rural setting. The impact on tourism receptors has been considered in volume 3, chapter 10: Socio-economics (document reference number A6.3.10) of the Environmental Statement. Since publishing the PEIR, refinements to Hornsea Three including reduction in the onshore cable corridor width have reduced the potential impacts on tourism receptors. For example, through avoidance of holiday parks where possible and adoption of the western landfall point, which avoids the need to use Weybourne Beach Car Park. Furthermore, it is considered that through mitigation of other potential effects, for example on traffic, air quality and noise through the various management plans, including the Outline CoCP and Outline Construction Traffic Management Plan, disruption should be kept to a minimum.

9.4.10.6 A summary of all relevant responses relating to socio-economics can be found in Annex 15 of this Consultation Report (document reference number A5.1.15).

### 9.4.11 Other developments

9.4.11.1 This section will provide an overview of the key issues raised as part of the PEIR consultation in relation to some of the other developments that are proposed in Norfolk that have the potential to interact with Hornsea Three. Two examples of such developments and the feedback received in response to these is provided below.

9.4.11.2 In response to the PEIR, there was also some confusion amongst stakeholders regarding the difference between inter-related effects and cumulative effects with many concerned that cumulative impacts were missing from inter-related sections. It was clarified with stakeholders that inter-related effects in this instance refer to multiple effects on the same receptor arising from Hornsea Three, which have the potential to produce an additive effect or where a number of separate effects have the potential to affect a single receptor. Cumulative effects on the other hand refer to the combined effect of Hornsea Three in combination with the effects from a number of different projects on the same receptor or resource. The cumulative impact is then the culmination of the changes resulting from any cumulative effects.

#### **Summary of feedback and Ørsted response**

##### Other developments: Norfolk Vanguard

9.4.11.3 Early in the development process, it was brought to Ørsted's attention by the local authorities that another offshore wind farm (Norfolk Vanguard), was being developed in Norfolk by another developer (Vattenfall). It was noted that the two developments (Hornsea Three and Norfolk Vanguard) were being developed over similar timescales and could have the potential to interact onshore, with Hornsea Three connecting into Norwich Main National Grid substation (as stated previously) and Norfolk Vanguard connecting into Necton National Grid substation. The onshore cable routes for Hornsea Three and Norfolk Vanguard would therefore need to cross at some point between the landfall zones at Weybourne and Happisburgh respectively.

9.4.11.4 At the point at which Ørsted published and consulted on the PEIR for Hornsea Three, Vattenfall had not yet published their PEIR and therefore the exact details including the nature and location of the crossing point was not confirmed. However, through the plans presented during earlier consultations it was evident that the crossing point would likely be just north of Reepham, in Broadland. In PEIR, the cumulative assessment of the Norfolk Vanguard scheme was based on publicly available information in the form of their Scoping Report.

9.4.11.5 In response to consultation on the PEIR, several consultees, including the local authorities, landowners, Parish Councils and members of the local community raised concerns regarding the potential cumulative impacts that could arise if both developments were to be taken forward either sequentially or simultaneously. It was noted that cumulative assessments in the EIA process rely on data which is publicly available. Since publication of the Hornsea Three PEIR, Vattenfall has published the PEIR for Norfolk Vanguard and this information has been incorporated into the final cumulative assessments presented throughout the Environmental Statement (document reference number A6) have been updated to reflect this. Importantly, based on this information, the assessments are expected to represent the worst-case scenario, as it is noted that Vattenfall will also be seeking to refine the design for Norfolk Vanguard between PEIR and submission of the application.

9.4.11.6 Concerns were also raised regarding the level of engagement between the two developers in respect of the two schemes, with many requesting assurances from Ørsted that the two developers would work together to minimise potential disruption locally. Throughout the development process, Ørsted has engaged with Vattenfall on all levels and have committed to coordinating activities with Vattenfall in respect of Norfolk Vanguard where possible. It is recognised that at this stage not all details are known or will be known until nearer construction, when the principal contractors for each Project have been appointed. In this respect, Ørsted has also committed to entering more detailed discussions (if the two schemes should be brought forward simultaneously) to reduce local disruption. For example, for traffic and transport this could include vehicle routing, ensuring appropriate signage is in place and plans to ensure vehicle movements are managed appropriately.

##### Highways works: Northern Distributor Road and A47 Duelling

9.4.11.7 In response to consultation on the PEIR, a number of stakeholders highlighted other developments that should be considered when developing Hornsea Three; including the Norwich Northern Distributor Road (NDR) and the duelling of the A47.

9.4.11.8 The NDR is a 20 km dual carriageway road under construction to run from the A47 at Postwick, east of Norwich, to the A1067 Fakenham Road north of Taverham. Ørsted has included this development within the traffic and transport assessment, which is assessed against a future 2022 baseline which assumes that the road is fully operational.

9.4.11.9 Ørsted met with Highways England during and post the statutory consultation (Phase 2.A) on the PEIR to discuss their plans in more details. In response to feedback, Ørsted has slightly amended the locations at which Hornsea Three will HDD under the A47 and has moved the temporary construction compound for the HDD works further north.

## 10. Statements of Common Ground

- 10.1.1.1 Where possible, Ørsted will be seeking to agree Statements of Common Ground (SoCGs) in collaboration with key consultees to assist the Planning Inspectorate, the examining authority and the Secretary of State in understanding which issues with regards to Hornsea Three have been agreed and which remain unresolved.
- 10.1.1.2 The SoCGs will set out a record of consultation undertaken to date with that stakeholder, the key agreements reached and outstanding issues. The SoCGs are draft documents at the application stage and will be updated during the examination stage, to reflect on-going consultation.
- 10.1.1.3 Ørsted plans to, or is already in the process of agreeing SoCG with the consultees presented in Table 10.1. A list of some of the topics that will be covered in each SoCG have been listed for each consultee to be further informed through discussions. Additional SoCG with other consultees will be drafted as required.
- 10.1.1.4 Annex 1 to this Consultation Report (document reference number A5.1.1) also provides an overview of where agreement has been reached on certain topics through the Evidence Plan process.

Table 10.1: SoCG currently in progress.

Consultee	Environmental Statement Topic
Natural England	Benthic Ecology; Onshore Ecology; Ornithology; Marine Processes; Marine Mammals and Seascape and Visual.
MMO	Marine Processes; and Benthic and Fish Ecology; and Deemed Marine Licences.
RSPB	Ornithology ( <i>offshore and onshore</i> )
TWT	Marine Processes; Benthic Ecology; Marine Mammals; and Onshore Ecology.
Whale and Dolphin Conservation	Marine Mammals.
MCA	Shipping and Navigation.
CAA	Aviation
CA	Shipping and Navigation
Trinity House	Shipping and Navigation
Historic England <i>offshore</i>	Archaeology
NFFO	Commercial Fisheries
VISned	Commercial Fisheries
Environment Agency	Water Framework Directive; Hydrology and Flood Risk; and Marine Processes.
Norfolk County Council	Onshore topics multiple
North Norfolk District Council	Onshore topics multiple
Broadland District Council	Onshore topics multiple
South Norfolk District Council	Onshore topics multiple
Historic England <i>onshore</i>	Historic Environment

## 11. Conclusion

- 11.1.1.1 Ørsted has carried out comprehensive pre-application consultation on Hornsea Three pursuant to the 2008 Act. The consultation has met and exceeded the requirements of the 2008 Act and has taken into account the relevant advice and guidance published by PINS and UK Government.
- 11.1.1.2 Ørsted held multiple rounds of consultation under sections 42, 47 and 48 of the 2008 Act. This reflected the level of interest and desire from stakeholders to engage in the process and the iterative nature of the design development.
- 11.1.1.3 Consultation responses to each round of consultation have been carefully documented and considered as part of the on-going development of Hornsea Three, with stakeholders having a clear influence on the proposals. Early engagement with stakeholders enabled them to view and comment on plans while they were still fluid, and in subsequent consultations to observe how their feedback had influenced proposals.
- 11.1.1.4 Throughout the consultation period, Ørsted actively sought and considered feedback from stakeholders on its approach to consultation to ensure that the consultation was as effective as possible and took on board comments where possible. In general, this has been well received by stakeholders, appreciative of efforts taken to provide as much information as possible in response to concerns.
- 11.1.1.5 Where Ørsted has not taken forward a recommendation for a major change to the application, this has been duly explained in this Consultation Report or within the supporting Annexes.

## 12. References

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