Hornsea 3
Offshore Wind Farm

Ørsted

[SENT BY EMAIL ONLY]

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RE: Hornsea Project Three - Proposed use of Oulton Airfield as Main Compound

Dear Mr Killingback,

Thank you for inviting Ørsted to attend the Oulton Parish Council meeting on 6 March 2018. Whilst I recognise that we were not able to answer all your questions at the meeting, it was useful to understand Oulton Parish Council's concerns in more detail and identify areas where it would be useful for the Project to provide further clarification. In addition, we have taken some items away to consider and address in this response.

First and foremost, please be assured that your concerns have been heard by the Project and that these are being considered. We captured a few additional points at the meeting that were not included in your previous response and these are listed in Section 1 of our response below. Please let me know if you think we have missed anything.

In Section 2, we respond to the three key concerns you raised in your letter and in Section 3, we provide direct responses to each of your questions. Finally, there were several areas where we thought it might be useful for the Project to provide some clarification, particularly around the phasing aspect and duration of use of the Main Construction Compound (which we recognise we did not provide a clear answer to on the night) and on the Rochdale Envelope approach. This is provided in Section 4, where we have also provided some information on the examination process, which was also presented at the Broadland briefing and Q&A session held last week .

I hope the information provided below addresses your questions. As discussed previously, when we met with the Parish Council (PC), we had only recently been able to extract some of the information from the assessments that were ongoing at the time, these needed to be undertaken until results are provided which can be analysed and discussed. For this reason, the project would value meeting with yourselves again to discuss the below in more detail and provide a further update.

If this would be of interest, please let me know and I can seek to arrange this.

Kind regards,

Emily Woolfenden

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SECTION 1: Summary of key points from the meeting

- The PC expressed strong objections to any use of or one-way routing through The Street.
- The PC raised a number of concerns on the health, safety, routing and associated noise and general disturbance of HGV movements on the local road network.
- The PC is opposed to HGV (and in particular Abnormal Load Movements) at night.
- The PC is frustrated by the “temporary status” applied to use of the old airfield site, as feel it is almost becoming a “permanent” site for “temporary” uses.
- The PC is concerned of the intrusion any security lighting may raise, generation of noise and generation of dust.
- The PC enquired about the types of traffic management measures the Project would be able to apply for as a Nationally Significant Infrastructure Project (NSIP)?
- Whilst opposed to the principle of making use of the airfield as the projects main construction compound, if it was used, the PC asked whether it would be possible to “take a spur” straight off the B1149, avoiding The Street in its entirety? Although the PC also raised concerns that this might lead to permanent industrial use of the site.
- Cllr Greg Peck enquired whether the Project had considered utilising the site near Great Witchingham? *Post meeting note: This site was considered by the Project, however, there were commercial challenges relating the timing of use and need to secure the site a number of years in advance.*
- The PC asked the Project to confirm the actual size of the compound. Post meeting note: The Project is seeking a main compound at Oulton which is 32,000 square metres (plus rights to access the compound across private land associated with the airfield.

SECTION 2: Response to key concerns raised

1) Scoping Report / Public Consultation

Scoping Area

At the time of preparing the Hornsea Three Scoping Report (Q4 2016), potential locations for the main construction compound had not been identified. The Scoping Report set out the proposed approach to the Environmental Impact Assessment (EIA) and provided an opportunity for interested parties to consider the approach to ensure a robust EIA is undertaken.

The Hornsea Three Scoping Report included a plan identifying the proposed onshore Export Cable Route (ECR) corridor search area. This is where the permanent onshore electrical infrastructure (onshore export cable(s), as well as the onshore HVAC booster station, onshore substation and connections to the National Grid) was proposed to be located. The Scoping Report advised that the exact number, location and size of the compounds required would be confirmed once a substation location and onshore ECR have been developed.

As you note, the Oulton Airfield site did not appear on plans until July 2017. In the Scoping Report, it was acknowledged that more detailed information on the site selection process for the permanent infrastructure and onshore works would be detailed within the Preliminary Environmental Information Report (PEIR) and then subsequently in the Environmental Statement (ES) that will accompany the Development Consent Order (DCO) application.

In July 2017, Ørsted (previously DONG Energy) published and consulted on its preliminary environmental information and supporting material. This included a set of “Statutory Plans”, which presented the PEIR boundary including three construction compounds (captured in the preliminary environmental information) and an alternative at Oulton Airfield.

It was noted in that consultation (27 July to 20 September 2017) that the potential use of Oulton Airfield as construction compound had not been identified at the point in time when the assessments were commenced (circa Q1 2017) - and therefore it was not possible to include it in the PEIR assessment. However, as the site had been identified prior to the commencement of the statutory consultation (July 2017) the Project presented this possibility to all interested parties to ensure that they had the opportunity to comment on it, in a similar manner alternative onshore cable routes were also labelled on the plans. These plans were displayed at the Community Consultation Events held in September 2017 and included within literature circulated in advance that Oulton Parish Council would have received.

Identification of Oulton Airfield & Consideration of Alternatives

As part of the Project’s development since Scoping Report, the Project has sought to identify construction compounds of various sizes to serve the construction of the cable corridor. These compounds are required for the laydown and storage of materials, plant and staff, as well as space for small temporary offices, welfare facilities, security and parking, and in the case of the main construction compound a central base to house the central offices, welfare facilities, and stores, as well as acting as a staging post and secure storage for equipment and component deliveries.

One of the first considerations for the Main Construction Compound was the location along the route itself. The Project sought to find a suitable location for the Main Construction Compound roughly halfway along the onshore ECR and as close as possible to the public highway network that will be utilised by the Project.

The Onshore Statutory Consultation Plan published in July 2017 identified four “construction compound” locations, two on the cable corridor just south of Salle, Weston Longville and Oulton Airfield. Each was given equal weighting on the key statutory consultation plan.

The three sites presented in the PEIR were selected by Ørsted, as being a suitable size and location. At the Parish Council meeting on 6 March 2018, Andrew Guyton, the Project’s Onshore Environmental Lead noted that these sites were promoted by landowners. This was incorrect, it was only the Oulton site that was promoted by the landowner.

The two locations on the export cable route just south of Salle were initially included as they were central to route and therefore had theoretical capacity to appropriately serve the whole route

Sites such as Oulton Airfield, with existing hardstanding were also preferable as they would require significantly less groundworks, excessive removal of agricultural land, and minimises environmental impacts such as land use disturbance. The challenge of finding suitable locations is also constrained by the requirement to identify, and secure rights to a site many years in advance of it being needed, limiting the availability of sites and hindering the projects ability to secure more established commercial / industrial spaces such as vacant industrial units.

After Oulton Airfield was identified to the Project, initial consideration by the project team confirmed that it warranted further consideration as it was well placed strategical along the cable route, and the established hard standing and circulation space lends itself to such a temporary use. Orsted has also been advised that the site had previously been used as a construction base for Sheringham Shoal Offshore Wind Farm Project and Bacton Pipeline and had not experienced security or access issues. Also, being supported in principle from the landowner is also a key benefit. For these reasons, at the PEIR stage it was evident that the site did have merit and should be included for consideration in addition to the three sites identified in the PEIR.

Both Salle sites are in agricultural use and would require site clearance and associated disturbance to the land over the 30-month construction period associated with construction works along the whole route (as opposed to the shorter disturbance period of approximately 3 months on any one point of the route as the work front installing the cables passes). These two sites were also discounted as they could also have had a prolonged impact on Salle County Wildlife Site and Grade II* listed Salle Park located immediately adjacent. Vehicular access to the wider road network was also constrained. Landowner opposition to the use of the Salle sites was also a contributory factor to them not being taken forward.

A further proposed site in Weston Longville was initially included, as like Oulton Airfield, is already hard standing and therefore did not require ground works. This site was welcomed by the landowner, however, the site is located more towards the southern end of the export cable route, and heavy goods vehicle (HGV) access to the site is also constrained, with numerous established weight limitations in the immediate area – facilitating the need for HGV movements to travel considerably further around the road network, away from the cable corridor hence interacting with more road users, to then coming back round to join the export cable corridor.

Ørsted was also advised that the local road network would continue to be restricted as the Northern Distributor road (NDR) came into operation, proposed A47 duelling works being promoted by Highways England and other associated localised diversions, potentially during construction period of Hornsea Three may further restrict access and routing options from the Weston Longville site.

Following the PEIR and further consideration of the sites, Oulton Airfield was selected by the Project as the most suitable location for the compound.

Selection of Oulton as Main Construction Compound

At our December 2017 briefing session, which was attended by two representatives of Oulton Parish Council, we provided an early indication that the Project was seeking to take Oulton Airfield forward as the Main Construction Compound.

We apologise for not responding sooner to your subsequent request for us to attend your Parish Council meeting. We recognise that the Parish Council has some specific concerns regarding the use of Oulton Airfield as the main construction compound and we hope that through open discussions we can provide some reassurances in terms of how we propose to manage this to minimise disruption locally.

We have tried to make ourselves as available as possible, through organising Briefing and Q&A sessions with representatives of the relevant Parish Councils, to which Oulton Parish Council have been invited and at our three rounds of community consultation events.

2) Transport and traffic documents

Traffic and Transport Assessment & HGV Movements

The Main Construction Compound will house the central offices, welfare facilities, and stores. It will act as a staging post and secure storage for equipment and component deliveries. For example, cable drums may be delivered to the main compound for storage before onward transport to the appropriate point along the cable route.

On this basis, contractors could deliver material in advance of their actual requirement and it would be stored at the compound until needed and then delivered to the active work front on the cable corridor. On these grounds it is very difficult to estimate daily construction vehicle movements to and from the Main Construction Compound.

Our Traffic and Transport assessment is currently being prepared by third party specialist, has not yet been reviewed based upon recommendations resulting from the assessment itself and therefore not approved yet by the project team within Ørsted. However, this assessment will not attempt to provide specific estimated daily construction vehicle movements at the compound, but will look to establishing a clear narrative as to estimated flows.

As part of the wider assessment for the whole of the onshore cable works, the Traffic and Transport assessment is utilising an alternative methodology to estimate the daily construction vehicle movements at the compound, as follows:

- Separate the onshore export cable corridor into circa 21 “sections” and then apply a forecast to estimate total and the daily construction vehicle movements for each section. This includes HGV movements and staff movements associated with all aspects of the cable corridor, but excludes works at landfall, booster station and substation which have more defined traffic generation numbers, associated construction compounds and, as typically managed by different principal contractors from those that construct the export cables, are more likely to travel direct to their respective compounds. In these specific areas, traffic movements will be calculated separately.
- The vehicle movements for each section are spread across the available access points for each cable route section (each section being typically 2.5 km long).
- The construction vehicle movements at each access are then assigned onto the surrounding highway network based on the most suitable route in that locality – so prioritising making use of higher order roads, those where two-way traffic can be accommodated and those that avoid accident hot spots.
- The project provides for up to five work fronts – so approximately five x 2.5 km sections being constructed at any one time. To provide a ‘worst case’ traffic generation rate in any one location – the project then assumes that all five” sections” are being constructed at the same time and that on any one day the maximum number of vehicles would be required to serve each of those sections. This provides an assessment of the estimated (theoretical peak) daily construction vehicle movements along each part of the highway network.
- The daily construction vehicle movements along all parts of the highway network is then reviewed and a maximum number on any part identified. This is then assumed to be representative of the maximum daily construction vehicle movements.

Now (i.e. pre- completion of the traffic and transport assessment) the project estimates that, as a worst case, the maximum number of movements on any part of the network would be: -

- A forecast peak of 213 daily staff movements.
- A forecast peak of 134 daily HGVs movements.

It is important to note however that not all staff and not all HGVs associated with a section would travel to the main compound.

Cumulative Impact with Vattenfall Scheme

Both Hornsea Three and Vattenfall's Project are currently preparing their traffic and transport assessments which will be submitted in support of their respective Development Consent Order applications. When the results of both are ready it will then be possible to consider the cumulative impacts of both projects.

We are engaging with Vattenfall on all levels of the Project and have committed to coordinating activities where possible based on Project timelines and the availability of data from assessments. We have also committed to entering more detailed discussions (if the two schemes should be brought forward simultaneously) in terms of vehicle routing, ensuring appropriate signage is in place and plans to ensure vehicle movement is managed appropriately to reduce local disruption. This is one of the reasons for identifying a vehicle holding area immediately of the public highway on the airfield site..

Previous Refusal (for an Anaerobic Digester in 2014)

Ørsted and traffic assessment advisors are reviewing this application and engaging with the Local Planning Authority to ascertain their concerns. Critically we note our proposals are for temporary imposition of traffic rather than a permeant imposition.

The Project is committed to preparing a Construction Traffic Management Plan (CTMP) for the construction of the onshore elements of Hornsea Three, developed in consultation with the relevant Local Highway Authority and Highways England[1]. The purpose of the CTMP is to document measures to manage construction traffic in accordance with the wider principles established in the projects Outline Code of Construction Practice (CoCP)[2] (currently being prepared, which will also be submitted with the Project application).

The CTMP will document the following:

- HGV routing from the principal 'A' road network to construction access points off the public highway. With the CTMP ensuring that all construction traffic follows pre-prescribed routing, to avoid impacts on the wider network and conflicts with local users.
- Route signage (if required), route timing and forecast vehicle movement estimates;
- Localised traffic management measures including temporary speed restrictions, or the installation of one-way traffic control systems through narrow highways. The Project acknowledges that certain restrictions may be applied by the Local Highway Authority to avoid congested or sensitive locations.

[1] CTMP – A plan managing all construction traffic, including protocols for delivery of Abnormal Indivisible Loads to site, personnel travel, measures for road cleaning and sustainable site travel measures.

[2] 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.

- Localised mitigation measures where necessary (e.g. traffic control measures);
- Details of any localised restrictions in vehicle movements (e.g. localised route restriction locations, localised restricted delivery timings or introduction of temporary speed limits);
- Document locations of supporting infrastructure (e.g. wheel wash facilities to be used by Hornsea Three contractors);
- The preferred route, route timing and method of transport for abnormal loads.

3) Other concerns

Operational Hours

Proposed core working hours for the construction of the onshore elements of Hornsea Three are to be proposed in the application are:

- Monday to Friday: 07:00 - 18:00 hours;
- Saturday: 07:00 - 13:00 hours;
- Up to one hour before and after for mobilisation ("mobilisation period"), i.e. 06:00 to 19:00 weekdays and 06:00 to 14:00 Saturdays; and
- Maintenance period 13:00 to 17:00 Saturdays.

During the mobilisation period, the contractor may undertake the following activities:

- Arrival and departure of the workforce at the site and movement to and from areas across the Project;
- Site inspections and safety checks; site meetings (briefings and quiet inspections/walkovers);
- Site clean-up (site housekeeping that does not require the use of plant); and
- Low-key maintenance including site maintenance, safety checking of plant and machinery (provided this does not require or cause hammering or banging).

Mobilisation does not include HGV movements into and out of sites (i.e. HGV movements should only occur at site during the core working hours unless otherwise agreed with the highway authority) or on the local road network. Suppliers travelling a greater distance can make use of the wider highway network outside these hours to travel to site but they will be restricted from idling or waiting near to the site prior to core working.

The Main Construction Compound may need to receive abnormal loads outside these hours and may need a 24-hour security on site. Working outside these hours will require approval by the Local Planning Authority or Environment Health Officer (EHO).

Lighting & Security

External lighting of the construction site will be designed and positioned to:

- Provide the necessary levels for safe working;
- Minimise light spillage or pollution; and
- Avoid disturbance to adjoining residents and occupiers.

Lighting during construction will consider the requirements set out in British Standard (BS) EB 12464-2:2014 (BSI, 21014) and guidance from the Institute of Lighting Professionals (Institute of Lighting Professionals, 2011 'Guidance Notes for the Reduction of Obtrusive Light').

Environmental Assessments

Importantly, with reference to your concerns about the requirements to undertake the necessary assessments. The application is required to undertake an assessment of its impacts, consistent with a typical Town and Country Planning Application (TCPA) made to the local planning authority. Similar to any TCPA that goes to appeal, the Project will be subject to independently appointed examiners.

SECTION 3: QUESTIONS

We have also provided direct responses to your questions below.

1) **What are the likely traffic movements (type and number) that will be generated by use of the Main Compound? What assurances can you provide the parish that these estimates are accurate and will remain stable over the lifetime of the project?** Please do not provide us with traffic movements arrived at as the result of an averaging exercise: we need to know the likely per hour traffic movements (1 vehicle in + 1 vehicle out = 2 movements) **at PEAK times and for how long such peak periods might last.**

See Section 2.2.

An Outline Traffic Management Plan will form part of the DCO application material. Within this Plan, it will require that prior to any material vehicle movements – regular HGV movements, the Project must prepare CTMPs. These CTMPs are prepared in consultation with the relevant Local Highway Authority and Highways England.

The CTMPs must follow the principles established in the Outline CTMP and support the Outline CoCP[3]. When reviewing the CTMP, the Local Highway Authority would then have regard to the ES assessment.

At this point in time, the Project cannot supply this level of detail. The exact role the Main Construction Compound will use will not be confirmed until a principal contractor for the export cable is appointed. What the application does do is to establish an envelope of activities that it could extend to and then take a “worst case” review of the vehicle movements into and out of the site.

The Project does not have prescribed or readily identifiable “peak periods”. However, peaks typically are towards the beginning of works when establishing the site.

1) **When will a proper assessment of the suitability of Oulton as the Main Compound be carried out, in compliance with PEIR requirements?**

The relevant assessments in for Oulton Airfield as the Main Construction Compound will be included in the ES that we submit alongside our DCO application in Q2 2018.

2) **Will this assessment also include the cumulative impact of the Vattenfall Project, which has recently upgraded the size of its own compound in Oulton? Both compounds would be using the same access road to the B1149.**

As both projects are being developed on very similar consenting timelines – Ørsted's assessment has not been able to take onboard the detailed proposals put forward by Vattenfall. In turn Ørsted has not issued Vattenfall with the assessment for Hornsea Three as they are currently being prepared, as so both projects have not been undertaken cumulative assessments on details that both projects are requesting consent for, the only information that can be assessed cumulatively is that which was available in the public domain, being the PEIR.

When both projects have completed their assessments, the Project can then undertake a cumulative assessment, and identify ways to co-ordinate activities. Ørsted is aware however, that both projects are proposing compounds in the same locality, making use of the same local roads.

3) **Will the assessment of the suitability of the access road take into account that this same stretch of road was the prime reason for the REFUSAL of planning permission AT APPEAL for an Anaerobic Digester on Oulton airfield in June 2014?**

See Section 2.2.

4) **What are the hours of operation of the Compound and would these be enshrined in a Planning Condition?**

See Section 2.3.

Hours of operation will be secured through the Outline Code of Construction Plan (CoCP), which is a certified document associated with the DCO application (and then in effect as a planning condition).

5) **Would there be an S106 Undertaking absolutely to prevent <u>any traffic</u> associated with the Compound from coming through the settlement of Oulton Street?**

Where S106 planning obligations are focussed on site specific mitigation of the impact of development. S106 agreements are often referred to as 'developer contributions' along with highway contributions. As Hornsea Three is determined under Planning Act 2008 – "developer contributions" as commonly termed are captured under different mechanisms.

Hornsea Three will not have a S106, but the wider principle – of planning obligations remains.

6) At this time the Project cannot make a commitment that traffic associated with the Project will not pass through settlement of Oulton Street. **What will be the exact type and operation of security lighting on the Compound? Permanent security lighting is unacceptable.**

See Section 2.3.

7) **What noise issues will be generated by activity on the Compound? Again, please do not average out the noise levels over a long period - as that is not how noise is experienced by human receptors. We need to know the likely decibel levels at times of peak activity.**

All uses proposed are not noise generating actives:

- Portacabin with offices, briefing and welfare facilities;
- Staff car parking;
- Wheel wash facilities (if deemed necessary);
- Indoor and outdoor lock-up storage areas;
- Storage for cables, cable drums, ducting and other construction materials including soil and aggregate;
- Storage for machinery, lifting equipment and specialist equipment such as Horizontal Directional Drill (HDD) rigs;
- Storage for fuels and bunded generator (portable generator(s) which could run on a 24-hour basis);
- Waste management (associated with Hornsea Three only); Storage of limited project waste before disposal to authorised waste disposal sites.
- Security facilities, lighting and fencing; and
- Other items associated with supporting the onshore construction works.

Notwithstanding this, where noise is generated, across the whole project, all works will be carried out in accordance with the following principles:

- Construction works will be undertaken in accordance with the best practicable means (as defined in Section 72 of the Control of Pollution Act 1974), to minimise noise and vibration effects. Noise control measures will be consistent with the recommendations of the current version of BS 5228 'Code of Practice for Noise and Vibration Control on Construction and Open Sites' - Part 1: Noise and Part 2: Vibration' (BS 5228-1:2009+A1:2014 and 2009);
- Best Practicable Means (e.g. the use of quieter alternative methods, plant and/or equipment, where reasonably practicable, the use of site hoardings, enclosures, portable screens and/or screening nosier items of plant, where reasonably practicable; maintaining and operating all vehicles, plant and equipment in an appropriate manner, to ensure that extraneous noise from mechanical vibration is kept to a minimum);
- Engagement with Environmental Heath Officers (EHOs) prior to and during construction;
- Site personnel will be informed about the need to minimise noise as well as about the health hazards of exposure to excessive noise. Their training will include advice relating to the proper use and maintenance of tools and equipment, the positioning of machinery on site to reduce noise emissions to neighbouring residents, and the avoidance of unnecessary noise when carrying out manual operations and when operating plant and equipment;
- Plant movement will be managed to take account of surrounding noise sensitive receptors, as far as is reasonably practicable;
- All construction equipment will be maintained in good working order and any associated noise attenuation measures such as engine casings and exhaust silencers shall remain fitted at all times;
- Where flexibility reasonably exists, construction activities will be separated from residential neighbours by the maximum possible distances;

- Plant conforming with the relevant legislation relating to noise and vibration will be adopted;
- Ensuring plant machinery is turned off when not in use.
- Ensuring no music or radios should be played on site;
- Ensuring, where practicable, that access routes are in good condition;
- Regular inspections of noise mitigation measures to ensure integrity is maintained at all times;
- Use of silenced equipment, as far as possible, (in particular silenced power generators if night time power generation) is required for drilling, site security or lighting; and
- Ensuring that vehicles do not park or queue outside residential properties with engines running unnecessarily.

Air Quality assessments are ongoing – so we cannot confirm what impacts on air quality will be generated (this will be included in the Environmental Statement as part of the application). However, like noise we can advise that no dust generating or odour actives are proposed at the Main Construction Compound and we do not anticipate the assessment will identify any significant impact.

8) How do you propose to mitigate the effects of the increased traffic on the residents of The Old Railway Gatehouse?

The application will not be proposing bespoke mitigation at any residential properties along the route, including The Old Railway Gatehouse. The focus of the application is to manage traffic through the CTMP (see above) and wider construction impacts through a comprehensive Code of Construction Practice.

SECTION 4: Further information / clarification

1) Construction Phasing

Construction Commencement

- Onshore construction is currently planned to commence in 2021 but could commence as early as 2020.

Phases

- Hornsea Three may be constructed in a single phase, or constructed in two phases.
- If built out in two phases, there is potential for an overlap or a gap between the completion of construction of one phase and the start of construction of the next.

Duration

All onshore elements of the project

- If built in one phase, for all onshore elements of the project, the maximum duration over which construction would occur is three years.
- If built in two phases, for all onshore elements of the project, the maximum duration over which construction would occur is eight years. The eight-year window provides for a staggered construction of the components (onshore

HVAC booster station, onshore HVDC converter/HVAC substation and Hornsea Three onshore cable corridor) and a three-year gap, within which no construction would occur.

- When referring to construction works – it is noted that at active construction locations (i.e. onshore HVAC booster station, onshore HVDC converter/HVAC substation and more complex horizontal directional drilling sites along the onshore cable corridor construction works would be preceded by pre-construction activities such as borehole investigations, ground investigations and some hedgerow and tree removal if required to avoid certain seasonal restrictions.

Specific to the onshore export cable – i.e. excluding the substation locations and works at landfall

- If built in one phase, the installation of the cable is expected to take up to 30-month (approximately 2.5 years) duration.
- Work is expected to progress along the route with a typical works duration of three months at any one location.
- Construction may be carried out by multiple teams at more than one location along the cable route at the same time. To ascertain “worst case” traffic movements for example, the project assumes a maximum of up to 5 work fronts or teams.
- If built in two phases, the installation of the cable will also take up to 30 months (approximately 2.5 years) but a gap between phases could occur. The maximum duration over which construction could occur would be 5.5 years incorporating two phases (assuming a three-year gap between the two phases).

Specific to the Main Construction Compound

- To support the installation of onshore export cable a main construction compound could be required.
- If built in one phase, the main construction compound could be in place for the full duration of the installation of the cables - up to 30-month (approximately 2.5 years) duration.
- If built in two phases, the main construction compound continues to be in place for up to 30 months (approximately 2.5 years) but a gap between phases could occur. The maximum duration over which construction of the export cable which the main construction compound supports would be 5.5 years incorporating two phases (assuming a three-year gap between the two phases). In that gap, the main construction compound would not be in active use, although depending on the extent of the gap it may be beneficial to leave certain apparatus in place – such as portacabins during the gap between phases – rather than de-mobilising to then re-mobilise. This would be agreed with the relevant authorities at the time when the gap between projects is known.

For the purposes of the EIA, each ES chapter considers the following scenarios:

Onshore highest intensity of activities

- The maximum intensity of construction for the onshore HVAC booster station would occur if it was built in a single phase with a two-year duration.

- The maximum intensity of construction for the onshore HVDC converter/HVAC substation would occur if it was built in a single phase with a three-year duration.
- The maximum intensity of construction for the Hornsea Three onshore cable corridor would occur if it was built in a single phase within a 30-month (approximately 2.5 years) duration.
- The maximum intensity of construction for Hornsea Three would occur if all components (onshore HVAC booster station, onshore HVDC converter/HVAC substation, Hornsea Three onshore cable corridor and landfall works) were built simultaneously, or overlapping across multiple components. Onshore, this could result in a minimum duration of three years for all construction activities, although activities may be spatially distinct and would be preceded by pre-construction activities such as borehole investigations at HDD crossing points.

Onshore longest duration

- The maximum duration of construction for the onshore HVAC booster station is two years, this therefore means that the maximum duration over which construction could occur would be five years incorporating two phases (assuming a three-year gap with no active construction activity between the two phases).
- The maximum duration of construction for the onshore HVDC converter/HVAC substation is three years, this therefore means that the maximum duration over which construction could occur would be six years incorporating two phases (assuming a three-year gap with no active construction activity between the two phases).
- The maximum duration of construction for the Hornsea Three onshore cable corridor is 30 months (approximately 2.5 years), this therefore means that the maximum duration over which construction could occur would be 5.5 years incorporating two phases (assuming a three-year gap between the two phases). The work in each phase is expected to progress along the Hornsea Three onshore cable corridor with a typical active construction works duration of three months at any particular location.
- The maximum duration of construction for all onshore elements of Hornsea Three would be eight years, which assumes construction across two phases with a three-year gap in-between, as a result of staggered construction of the components (onshore HVAC booster station, onshore HVDC converter/HVAC substation and Hornsea Three onshore cable corridor) and each phase would be preceded by pre- construction activities such as borehole investigations at HDD crossing points.

2) Rochdale Envelope Approach

In the meeting, one member quoted the information taken from Advice Note Nine: Rochdale Envelope, produced by The Planning Inspectorate and therefore the Project would like to provide some clarity here in terms of how this approach is being applied to Hornsea Three.

The final Environmental Statement (ES) submitted with the DCO application for Hornsea Three will clearly define the parameters which are being applied for. These will be detailed within Volume 1, Chapter 3 Project Description, a draft of which was included in the Preliminary Environmental Information Report (PEIR) which was consulted on in Summer 2017 under Section 42 of the Planning Act 2009. The Environmental Impact Assessment

(EIA) which is detailed within the ES will be undertaken on the basis of a Maximum Design Scenario. This is consistent with the Rochdale Envelope approach and the full methodology applied in conducting the EIA can be found in Volume 1, Chapter 5 EIA Methodology, a draft of which was also consulted upon in Summary 2017 in the PEIR. This approach ensures that the likely significant effects of the Maximum Design Scenarios are comprehensively assessed within the individual receptor assessments whilst allowing for the flexibility required for a project which is some years from construction.

Volume 1, Chapter 3 Project Description of the ES will define the range of parameters for which Hornsea Three will seek consent. Each of the individual topic chapters (each covering a particular receptor i.e. onshore ecology or traffic and transport) then considers these parameters before defining a Maximum Design Scenario for that particular assessment. The key development parameters will be written into the Development Consent Order, a draft of which is submitted at the point of application and is the subject of scrutiny during the formal Examination process. Through this examination and amendments to that document, the Local Planning Authority can have confidence that the project is limited to those parameters applied for and assessed within the ES.

Through ongoing consultation with Statutory bodies as well as the public, Hornsea Three will ensure that the level of detail provided within the final ES allows for a thorough assessment of the likely environmental effects of the proposals, adopting a 'worst case' approach through the identification in each receptor chapter of the relevant Maximum Design Scenario. This in turn then allows for the consideration of the potential need for mitigation of any impacts. In assessing the Maximum Design Scenario, the project and the relevant planning authority can be satisfied that mitigation measures have adequately dealt with the worst-case impacts.

The flexibility for which Hornsea Three will apply for consent is based on extensive knowledge of the current offshore wind industry as well as a good understanding of the likely technological developments that will be seen within the industry over the timescales in which the project may come forwards. As a global leader in offshore wind, Ørsted believes that our understanding of the market allows for a realistic view of the potential changes in the industry in the near future. This knowledge has been applied in the development of the Rochdale Envelope criteria for which Hornsea Three will seek consent. Volume 1, Chapter 3 Project Description of the final ES will provide sufficient detail to ensure that any likely significant effects on the environment can be assessed comprehensively.

Hornsea Three has engaged extensively with the Local Planning Authorities in the development of the Project up to this point. This engagement will to continue up to the point of application and beyond, into examination and through to construction works. All four authorities provided responses to our Section 42 consultation on the PEIR, including comments on the details of the approach to assessment proposed in those documents. We continue to engage with these Authorities as our EIA develops further to ensure that the range of possible effects and associated flexibility are appropriately assessed.

For Hornsea Three, as explained in the text from Advice Note Nine above, detailed information on certain aspects of the project are not yet available as the project is still some years from final design and construction. Wherever possible, Hornsea Three will seek to refine the Rochdale Envelope ahead of the application for consent to reduce the flexibility that is being requested. For example, from the list above, Hornsea Three will seek to define the specific location of the landfall point as well as the location of the onshore substation and grid connection point. For other parameters it is necessary to maintain some flexibility.

3) Examination Summary

What happens after we submit our application?

The Planning Inspectorate has 28 days to accept the application.

If accepted, we have a duty to notify all parties who have registered their interest in the Project. Interested parties wishing to be involved in the examination will be invited to register their interest to the Planning Inspectorate.

Anyone who has registered their interest will be invited to submit their views on our proposal in writing and may be asked to speak at one of the public hearings.

The Planning Inspectorate will hold an examination (6 months) and then has further three months to make a recommendation to the Secretary of State (SoS) for Business, Energy and Industrial Strategy. The SoS then has a further three months to make a decision on whether to grant consent.

If approved, construction Hornsea Project Three could start in 2020 and could be operational as early as 2025.