

## OPEN FLOOR HEARING

### NORFOLK VANGUARD

February 6<sup>th</sup> 2019

I'm a member of N2RS, a local group of residents representing around 1000 supporters of HVDC technology for wind farm infrastructure projects in Norfolk. I've tried to attend as many meetings as I could in relation to Norfolk Vanguard and Hornsea 3 over the past 2 years.

Before I retired, I worked as a senior manager in both the public and private sectors. I was a Non-Executive Director of a not for profit Company. I mention my background because I feel that had I not had that experience, I don't think I would have had the confidence or skills to navigate my way through the hundreds of documents on both project websites nor contribute both in writing and in person to this inspection. Even now, I'm uncertain as to whether I've read the relevant documents or missed something vital. The experience has led me to think that public consultations under current regulations are grossly inadequate to the task of helping ordinary people to be fully informed and involved.

With two of the biggest wind farm projects in the UK being inspected concurrently in the District of North Norfolk, it's been quite a task for the public to be really well informed and to play a role. Local media has been sporadic in its interest and inertia is the unfortunate consequence of feeling that one's voice is unimportant.

I will confine my comments to the adequacy of cumulative impact assessment reports and I refer in particular to the **onshore environmental impact assessment (Environmental Statement) produced by Vattenfall & Orsted in June 2018.**

Vattenfall's Vanguard and Boreas projects intersect with Orsted's Hornsea 3 and whilst there is growing clarity on Vattenfall's proposed onshore work, there is complete ambiguity on Orsted's part.

Nevertheless, both companies were tasked with producing a cumulative impact assessment report on the area of North Norfolk where the two projects overlap. To people who live, work or visit North Norfolk as a tourist destination, these projects could blight their lives for the several years from pre-construction through to the operational phases of both projects. They deserve to know what is coming with as much clarity as possible.

The report appears to assess the environmental, onshore impact of both projects however on closer inspection, it does so in the absence of crucial information about the type of onshore works that Orsted will adopt. This is because Orsted will not commit to one or other transmission system prior to the DCO.

In addition, whichever transmission system Orsted pursues it is firmly committed to undertaking its onshore construction cable run in two distinct phases with a significant gap of two years in between works. This phasing has been questioned, challenged and in some cases objected to by landowners and farmers along the relevant stretches of land.

Assuming the projects are approved, the potential scenario is therefore 3 disruptive phases of construction work on the same stretches of land of unknown duration in which Orsted will undertake construction work on the cable corridor twice for no discernible reason other than because it wants to do so and that Vattenfall will undertake their work in one go.

How is it possible to make sense of a cumulative impact assessment with so many unknown variables?

The report I refer to states

**Depending on the timings of the works for Hornsea 3, there may be cumulative impacts during construction works associated with the cable route for Norfolk Vanguard.**

In the box marked Cumulative Impact Significance it says 'minor adverse'.

Later in the document there is an admission that some information is known privately but not publicised (p17) it refers to

**'insufficient information in the public domain with regard to final scheme proposal'**

Further, the report states

**The Hornsea 3 onshore cable route will cross Norfolk Vanguard cable route. The exact location and manner of this crossing will determine the magnitude of cumulative impacts on local tourism and recreation assets. DETAILS OF THIS CROSSING WILL BE DISCUSSED WITH LOCAL STAKEHOLDERS.**

This last statement is not an impact assessment.

From my attendance at Orsted's recent meetings in Norwich, I noted that Orsted was asked by the landowners group to set out much more clearly the likely scenario of works on the overlap site in question. Clearly, landowners and farmers have a number of issues which impact on their ability to farm the land without disturbance. The issue of cable failure is an additional risk in terms of disruption. Orsted were unable to respond to the question and requested that they submit a response later in writing.

I don't wish to labour the point, but clearly any joint impact assessment between Vattenfall and Orsted is fraught with too many ifs and buts to be of any use in terms of informing the public and allowing public debate or contributions?

I repeat that this is not a fault on the part of Vattenfall who have clarified many aspects of their project but in the absence of a further impact assessment how is the public to know how make sense of a joint cumulative impact assessment which simply doesn't contain the facts?

I hope very much that this examining authority will add further scrutiny and obtain as much clarity as possible before it concludes this inspection and perhaps in these unusual circumstances, consult with their colleagues inspecting Hornsea 3.

Thankyou.