



## **ORSTED: HORNSEA THREE**

**INTERESTED PARTY – WRITTEN REPRESENTATION IN RESPONSE TO THE EXAMINING**

**AUTHORITY DEADLINE: November 7<sup>th</sup> 2018**

**Registration: 20010193.**

**Authors: Katie Taylor (Planning), Beverley Wigg (Communications), N2RS**

### **1. Background**

1.1 N2RS is a local campaign action group with approximately 1000 supporters based in North East Norfolk. It was formed in April 2017 amidst concerns about the proposed onshore infrastructure planned to support Vattenfall's Norfolk Vanguard and Boreas offshore wind farms.

1.2 N2RS realised the importance of monitoring Orsted's Hornsea Three offshore wind farm project because it presented similar challenges to those communities affected by Norfolk Vanguard and Norfolk Boreas. The potential cumulative effect of all projects to the detriment of the Norfolk landscape and the livelihoods of many residents gave further impetus to the campaign. The absence of a government led strategic plan to lend some coherence and co-ordination to both projects only served to increase levels of anxiety. In addition, the potential impact of the projects had not been communicated to members of the public in such a way as to alert them to the scale and impact of the onshore structures.

1.3 N2RS made initial representations regarding Hornsea Three by attending and speaking at the North Norfolk District Council (NNDC) Cabinet Meeting on September 5<sup>th</sup> 2017. The key submission was that NNDC should take account of all the available evidence on the environmental impact of HVAC and HVDC systems and to adopt the principle of recommending the least environmentally damaging option. NNDC reported to the inspectorate in July 2018 that it concurred with this principle judging that HVDC would have the least damaging impact on the district of North Norfolk particularly as it would negate the need for the booster station (cable relay station) near Little Barningham.

1.4 With limited resources, N2RS prioritised its attention on the HVAC v HVDC issue. During an intense and high-profile campaign, it became clear that local people were largely unaware and uninformed about the detail of the offshore wind energy systems. However, once the information had been publicised and discussed in local meetings, the majority of people saw HVDC as the only option. Vattenfall came to recognise the strength of public opinion against HVAC on environmental grounds and it made a corporate decision prior to making its formal submission to the Inspectorate to commit to the more environmentally friendly HVDC technology and to HDD methodology for its cabling. As a result, booster stations will not be required for Norfolk Vanguard and Norfolk Boreas and the original width of the cable corridor will be more than halved.

1.5 Vattenfall's decision removed - at a stroke - a great deal of public anxiety and uncertainty. Whilst there are clearly still many extremely important issues to resolve for some communities with respect to onshore development and the implementation phase, nevertheless its decision not to use the Rochdale Envelope approach to delay making a choice has been warmly welcomed.

1.6 It is a particular disappointment therefore that Orsted continues to pursue the Rochdale Envelope approach with Hornsea Three (in which it is further advanced in the planning process than Vattenfall) for reasons that some communities will feel are dubious and not in the spirit of the original intention of it. We note that the CPRE have drawn attention to this point about the Rochdale Envelope in their July 2018 submission and we trust that the validity of using the Rochdale Envelope will be a particular line of enquiry for the Inspectors.

### **2. The Orsted Proposal and HVAC Booster Station**

2.1 N2RS has consulted with local organisations and has sought to understand as far as possible the issues in relation to Hornsea Three. Members of N2RS are not experts; they represent ordinary residents and look at the project from a layman's point of view.

2.2 Members of N2RS visited the site of the proposed booster station near Little Barningham but found it difficult – on a number of levels - to reconcile the actual landscape with the photomontages supplied by Orsted. N2RS assumes there are national standards for the way these images are reproduced for the purposes of consultation but in our view the photomontage technology falls short and does not accurately represent what the human eye sees.

2.3 (This same problem was encountered during the Norfolk Vanguard consultation, where with the benefit of local knowledge, we could compare the structures visualised with familiar landmarks and farm machinery of known height and we concluded that the photomontages did not show the true scale of the proposed structures and its likely impact on Norfolk's unique landscape.)

2.4 In addition to the poor quality of the visuals, there are no clear pictures of what a proposed booster station near Little Barningham would actually look like when constructed, nor any information on what the structure would sound like or what it would look like at night - a point made by Friends of North Norfolk in their submission in July 2018. N2RS also noted the comment made by Natural England in its recent submission in July 2018 which drew attention to the absence of information as to the night time impact of a booster station and whether or not lights will be used in an area where we understand there to be little light pollution.

2.5 N2RS supports the view expressed by Edgefield Parish Council in their submission in July 2018 that the booster station would be clearly visible from the parish. It exemplifies the lack of trust felt by residents with regard to the choice of site, the use of a booster station and importantly, the unconvincing comments regarding mitigation.

2.6 Taking all these points into account and given that these photomontages are designed to show the worst-case scenario (ie HVAC) it renders this aspect of the consultation somewhat meaningless.

2.7 Note: On our visit we found the area to be typical of the attractive Norfolk landscape that appeals both to locals and tourists, something not always apparent from the applicant's own images – See photographs taken by N2RS on 31.10.18 Appendix 1.

### **3. Timescales**

3.1 The prolonged timescales for implementation of Hornsea Three (at least 8 years) have not been a particular focus for N2RS but with so many of our supporters whose livelihoods are associated with the tourism and retail industry and the wider occupations dependent on tourism, it is right that we add our concerns to those interested parties who have also referred to this in their submissions. The NFU has submitted concerns about this point so we do not feel the need to repeat the obvious disruption here other than to reinforce those concerns.

### **4. Coherence and strategy**

4.1 N2RS has found the National Infrastructure Planning process to be challenging. Research conducted by the Green Alliance (Opening Up Infrastructure Planning: 2015) calls on Government for a more strategic approach to infrastructure planning. In Norfolk, the community was taken aback when, through the diligence of a few members of the public rather than professional publicity, there was a gradual realisation that the county was about to be criss-crossed by two major projects with some communities inevitably at the crossroads of those two projects facing an appalling and unexpected predicament.

### **5. Conclusions**

5.1 Vattenfall has made a firm commitment to HVDC and, importantly, it has listened to the strongly felt concerns expressed by many people living and working across North Norfolk as a result of our high-profile campaign and the strenuous efforts of many other groups and individuals including local and parish councillors, our MP and other local groups.

5.2 N2RS asks inspectors of Hornsea Three to consider the rationale for Orsted to participate in a co-ordinated and coherent regional approach for Norfolk by aligning its transmission systems with Norfolk Vanguard and Norfolk Boreas and to do so at the earliest opportunity to minimise the uncertainty and anxiety caused by the adoption of the Rochdale Envelope.

5.3 From our scrutiny of the written submissions made to the inspection team so far from statutory and non- statutory bodies, professionals, local experts and other members of the public, it is clear that whilst there are still many crucial issues to be resolved, there is currently a broad consensus in line with our own campaign objectives for Orsted to adopt HVDC and that there are no compelling reasons for Orsted to do otherwise. We stand to be corrected if we are wrong in believing that the majority of people, professional organisations and other representative groups are *not* promoting HVAC as the better option for this project.

#### APPENDIX 1

Photos taken by N2RS of the landscape surrounding the proposed booster station site near Little Barningham on 31.10.18



Web: [n2rs.org.uk](http://n2rs.org.uk)

Email: [REDACTED]