

From: [Michael Rayner](#)
To: [Hornsea Project Three](#)
Subject: re: Hornsea Project Three post hearing submission
Date: 13 December 2018 12:43:50
Attachments: [Orsted Hornsea 3 deadline 3 submission.docx](#)

Good Afternoon,

Please find attached the post hearing submission on behalf of CPRE Norfolk for your attention.

Best wishes,

Michael Rayner
Planning Campaigns Consultant, CPRE Norfolk

www.cprenorfolk.org.uk
01603 761660

15 Pigg Lane, Norwich, NR3 1RS

My usual office hours are Wednesday and Thursday 9.30pm – 4.00pm

View and read CPRE Norfolk's Vision for Norfolk at <http://v4n.org.uk/>

CPRE Norfolk is a county branch of the Campaign to Protect Rural England and is a separate registered charity, no. 210706.

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Hornsea Project Three Offshore Wind Farm

Deadline 3 – post hearing submission on behalf of CPRE Norfolk

CPRE Norfolk considers that Orsted are not complying with the spirit if not the legality of PINS Advice Note 9, upon which they base their case on the 'Rochdale envelope' approach. Why consider starting with a baseline which is essentially the worst-case scenario (HVAC), rather than use the option which provides the single most powerful mitigation measure (HVDC?) Further they are paying little attention to what the NPPF says in the Introduction and the relationship with NSIPs. This is most apparent in that in the huge amount of Orsted documentation there is virtually no mention of such a thing as an ecological network.

We have a great concern that the cabling route runs north-south through the Norfolk Coast AONB and the centre of the whole Glaven catchment. It can affect a number of restored farmland ponds. It runs past Baconsthorpe Castle, which sits between two long running planning applications for single mast onshore wind turbines. The cabling is nearly all done by open-cut trenching with up to ten years before any restoration work can start. Moreover, we are very concerned by the possibility that trenching and cable-laying could take place in two phases, which we feel should be avoided. While we welcome the commitment to the use of HDD for crossing watercourses etc. we remain concerned about the impact of trenching and cable-laying on the Glaven catchment as a whole, given its environmentally and ecologically sensitive nature. We note that 17 of the 31 sites for evaluating the presence of the key native white-clawed crayfish were not accessible for survey, and therefore have concerns that their presence or otherwise has not been fully considered.

The most effective form of mitigation against the negative effects on the countryside and its communities would be to make the decision at this stage to use HVDC as the onshore transmission system. This is in particular due to the fact that a sole HVDC system (note not a HVDC system which also has a HVAC circuit included) would have approximately half of the land disturbance and take of a HVAC system, in addition to not requiring an onshore cable-relay station. Unlike Vattenfall with their two projects running east-west across the county, Orsted has not moved to only going forward with the HVDC power transmission system, as Orsted is persisting with the choice of HVAC as well as HVDC. Their decision on the two options will not be taken until construction work begins, and it should be noted giving short notice of which transmission they intend to employ, as this will be communicated by Newsletter. The first of these Newsletters will be issued at least 4 months in advance of the commencement of works, but the applicant doesn't commit to saying the choice of transmission system will be included in this first Newsletter, so there is no clear commitment as to when or how much notice will be given about this crucial decision, if the application is allowed to proceed on this basis. If this is the case, then we would urge for clear clarification to be given on this matter.