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**From:** Mulbarton Parish [mailto:mulbartonparish@btconnect.com]  
**Sent:** 07 February 2019 16:05  
**To:** Hornsea Project Three  
**Subject:** Hornsea Project Three (EN010080)

Good afternoon,

**Hornsea Project Three (EN010080)**

Our ref: 20010562

Please find attached written submission from Mulbarton Parish Council in regards to the above.

Kind regards

Anne

Anne Phillips

Parish Clerk, Mulbarton Parish Council

Parish Office, The Common, Mulbarton, NR14 8AE

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# **MULBARTON PARISH COUNCIL**

## **Hornsea Project Three**

### **Deadline 6**

#### **Introduction**

Mulbarton Parish Council strongly supports Hornsea Project Three, and looks forward to a successful completion of the project.

There is, however, reasonable cause for doubt as to whether the site currently chosen for the onshore converter substation, Option B, is either appropriate, or deliverable.

#### **Site selection process**

The site selection process is illustrated on page 31 of the relevant document<sup>1</sup>, as shown in Attachment 1. This procedure identified the general area of Option A as being subject to the least number of constraints, but does not appear to have considered the local planning policies applicable to Option B, as shown on the policy map<sup>2</sup> in Attachment 2.

In particular, Option B would seem to be in conflict with three local policy criteria:

- (a) The Norwich Southern Bypass Landscape Protection Zone (NSBLPZ);
- (b) View Cones towards Norwich (the viewing cone from the south-west);
- (c) Undeveloped Approaches (the B1113, to the north of Swardeston).

The effects on heritage assets for both Option A and Option B have been discussed at length by other parties, and would seem to be an important aspect of the position of South Norfolk District Council on the question of AC or DC transmission.

In the case of Option B, it seems unlikely that mitigations by planting would be effective. This is because of the height of the substation building, the density of the planting scheme needed to provide effective screening, the time taken for trees to grow to maturity, and the need to remove up to 430m of roadside frontage to provide for visibility splays and access to the site for abnormal loads ('over-running'). It is not clear how planting can begin until after the delivery of all abnormal loads, which may be required in the second phase of the project; there would also be no planting across the site entrance, or over the cable route.

The positions of Options A and B, and also of Mangreen quarry, are shown on an aerial view in Attachment 3. The northern section of Mangreen quarry was correctly identified in the selection process as 'quarried land', even though it was no longer in use for extraction when the evaluation was carried out. The southern section is not identified at all. Although that section is currently still being worked, there are good reasons to expect that extraction will cease before the currently authorised date of 31st December 2021. The two adjoining sites previously identified for mineral extraction have recently been withdrawn.

The planning history of the area around Mangreen quarry is summarised in Appendix 1. Over the last fifteen years, detailed environmental and archaeological surveys have been carried out in the area, and the larger part of the quarry site has already been excavated. New equipment above 16.5m in height has been approved for installation at Norwich Main.

These considerations suggest that Option A would not be significantly constrained in terms of either temporary or permanent space requirements, maximum acceptable height of installed equipment, or vehicle access to and from the road network.

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<sup>1</sup> EN010080-000529-HOW03\_6.1.4\_Volume 1 - Ch 4 - Site Selection and Consideration of Alternatives.pdf

<sup>2</sup> From the South Norfolk planning document: Development\_Management\_Policies\_Document\_Maps.pdf

## Traffic assessment

The traffic impact of the construction phase of the onshore converter substation is given on page 4 of the relevant document.<sup>3</sup> This shows the following impacts on the local road network for Option B, which is currently expected to use access from the B1113 only, whilst also generating some additional HGV traffic on the A140:

	<u>Baseline</u>		<u>Project</u>		<u>Impact</u>	
	Total	HGVs	Total	HGVs	Total	HGVs
B1113	8,594	561	846	528	+ 10%	+ 94%
A140	21,826	2,833	248	142	+ 1%	+ 5%

It seems hardly fair to describe the impact of Option B on the B1113 as 'negligible'. In the case of Option A, whilst there would still be an adverse impact on the A140, this would be much less dramatic, as the total increase in HGV traffic – presumably an increase of up to 670 vehicles per day – would be less than 25% of the baseline estimate.

## Public consultation

The highlighting of Option A until a late stage in the consultation process is likely to have diminished public interest in the project. It is very difficult for the public to appreciate the visual impact of Option B as seen from the local road network, or from any of the protected sites and viewpoints, or from countryside footpaths and bridleways.

The comparison between Option A and Option B in terms of both visual impact and the effect on local roads and traffic was not made clear in the consultation documents. Further, the potential interaction between the selection of the site for the onshore converter station and the choice of AC or DC transmission was not made clear.<sup>4</sup>

## Availability

The applicant has explained that compulsory purchase provisions are required, even for those sites where voluntary agreement is forthcoming, as this may change over time. It is difficult to see how these provisions can be applied to Option B, when a reasonable alternative may be available, in closer proximity to the required termination point.

Option A would appear to offer a greater prospect of public benefit, and a reduced level of harm; thus, the assessment of site availability should presumably still favour Option A.

## Conclusion

In our view, the site currently chosen for the onshore HVAC/HVDC converter substation is unsuitable, and in the absence of a compelling public interest, there is reasonable cause for doubt as to whether it is either appropriate, or deliverable. There does not seem to be sufficient reason to change from the applicant's original preference of the area of Option A, which seems to be less harmful in terms of traffic and environmental impacts.

<sup>3</sup> EN010080-001620-Ørsted Hornsea Project Three (UK) Ltd - Appendix 1 - Appendix G to the Transport Assessment.pdf

<sup>4</sup> See for example, para 4.10.7.16 of the Consideration of Alternatives document, which states: 'Due to the early stage of technical investigation at the point of the Phase 1.B consultation events, the specific sites presented in Figure 4.15 were not shown at the consultation events as work was ongoing to determine whether each was considered to be technically feasible. However, the heat mapping exercise was presented to demonstrate the process that Hornsea Three was using to try to identify potential sites.'

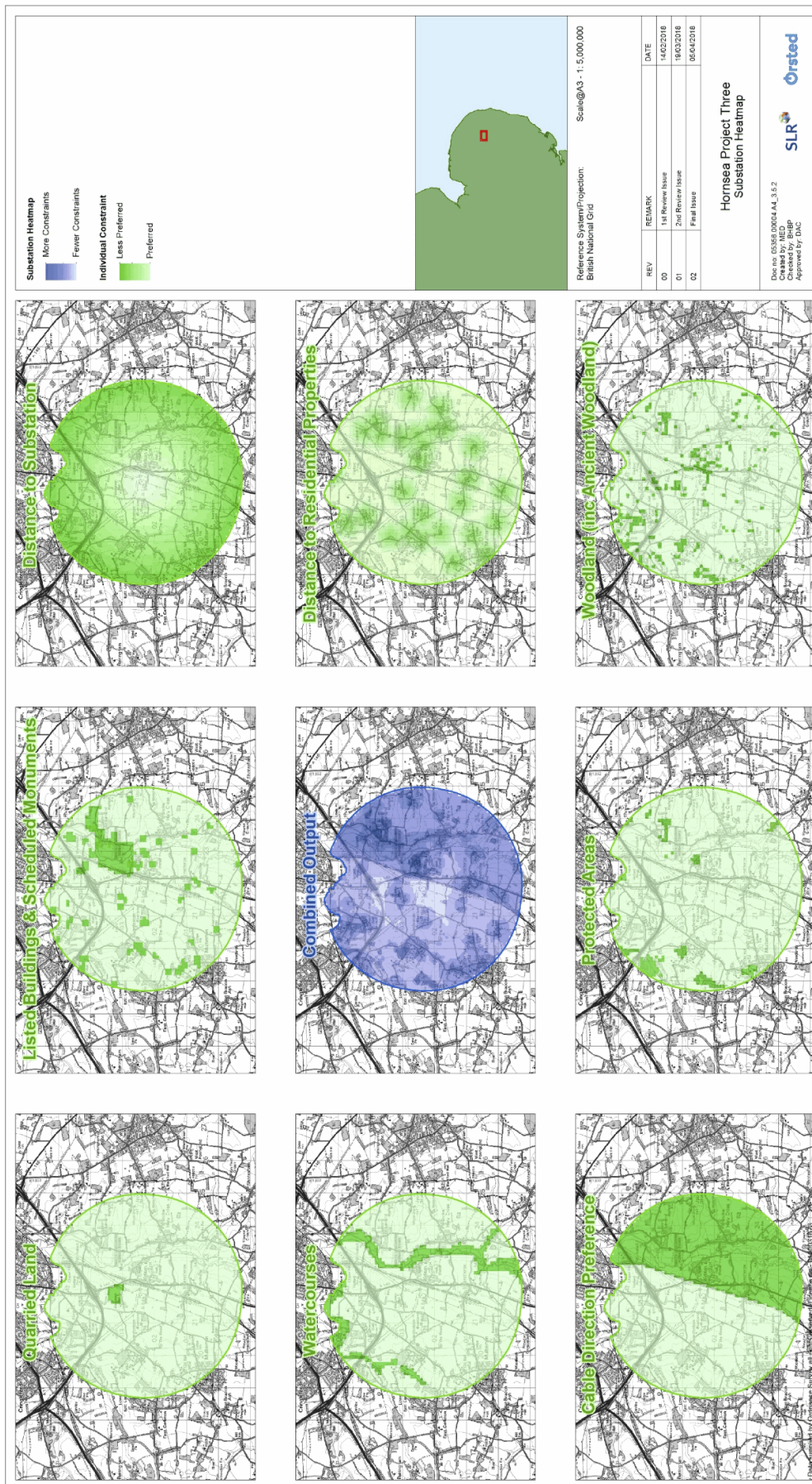
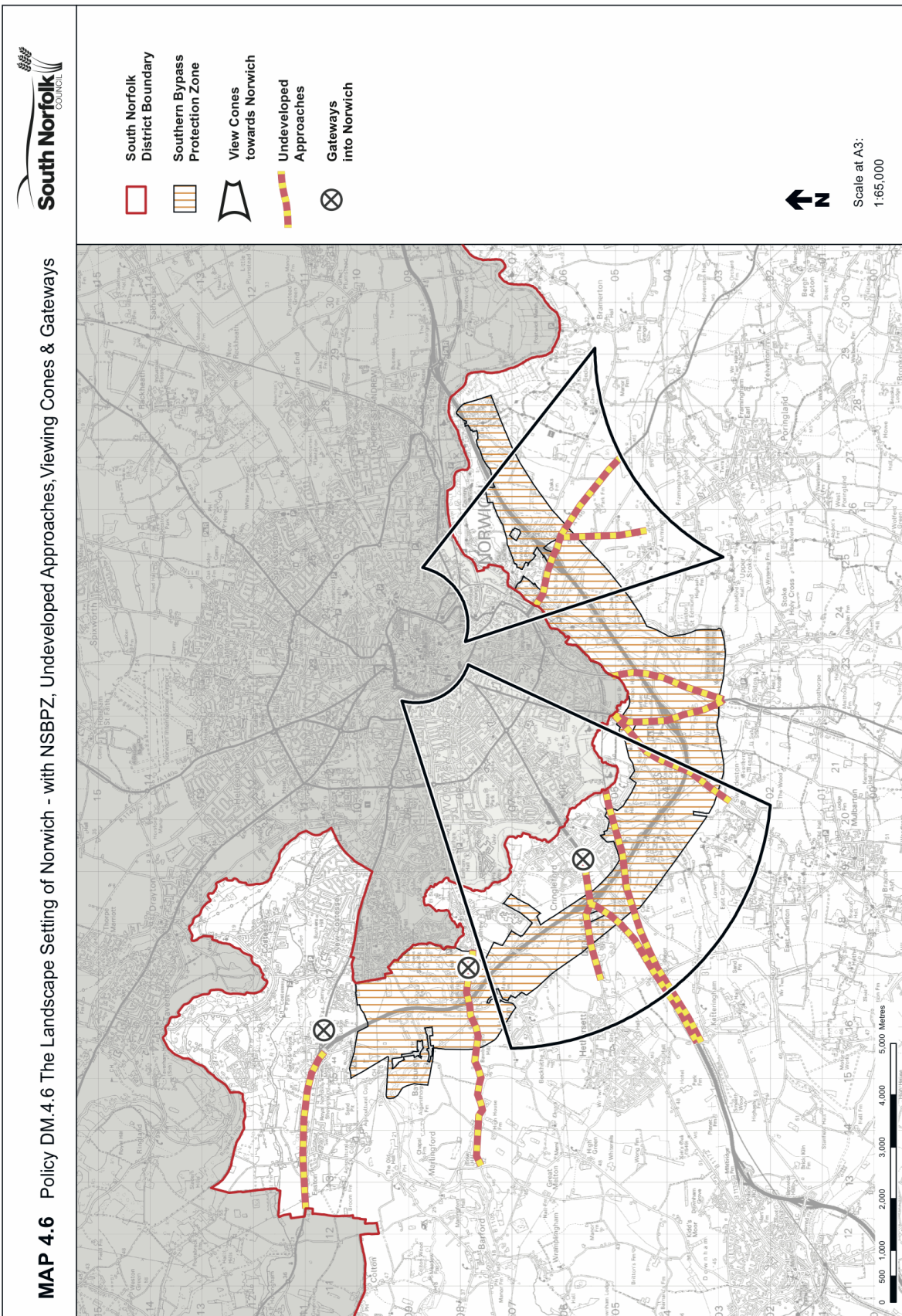
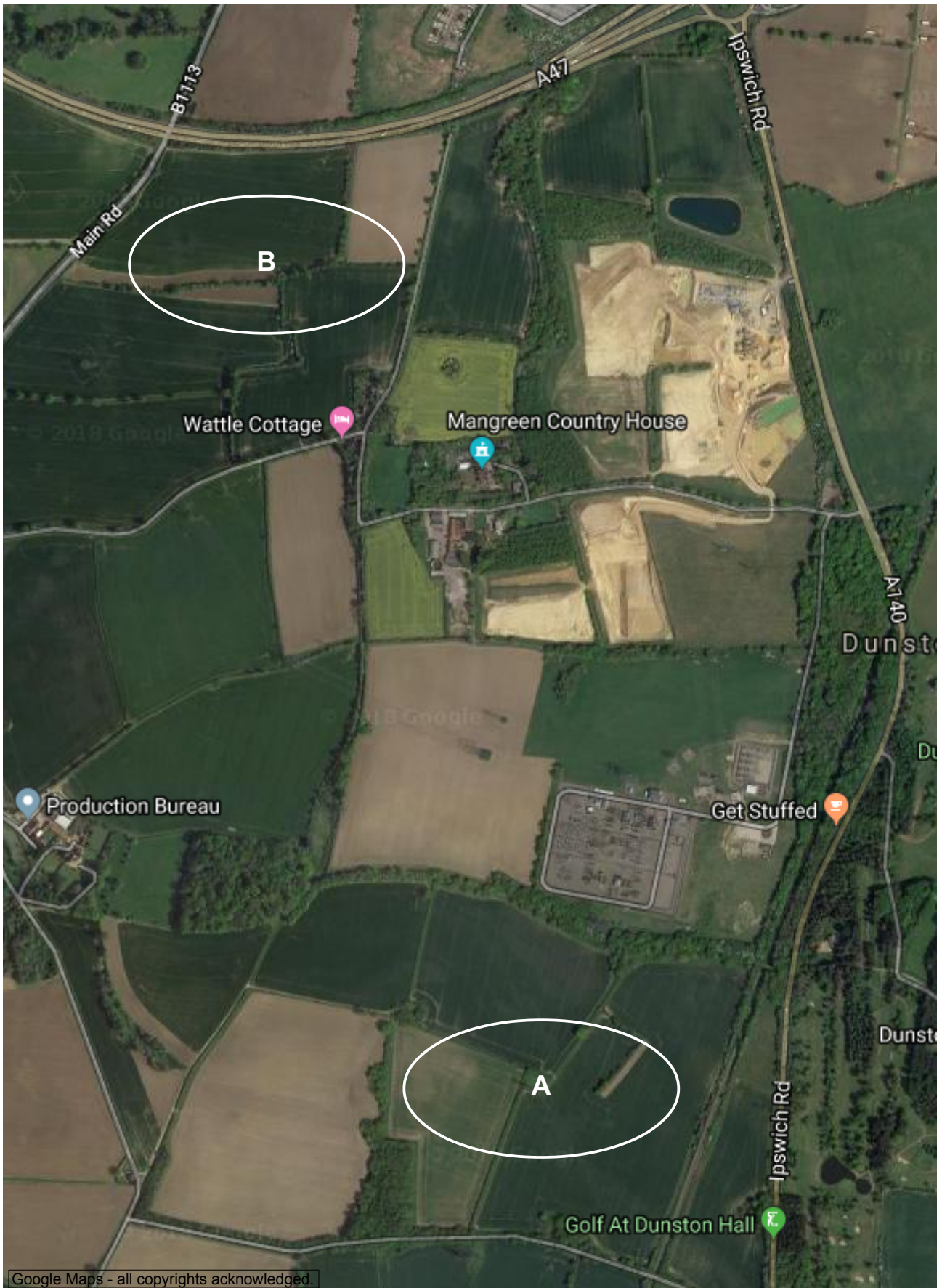


Figure 4.15: Constraints mapping of onshore HVDC converter/HVAC substation search area.









Onshore converter substation – Options A and B

## **Planning history of the Mangreen quarry area**

### Northern section

The main planning application for gravel extraction from the northern part of the site was approved on 14th December 2005 for a period of up to ten years, ending by no later than 13th December 2015. Progressive restoration of the site was initially to be complete within a further two years. (Ref. C/7/2004/7017).

In July 2008 approval was given for the addition of an aggregate bagging plant, to run for the unexpired portion of the original term until 13th December 2015. A condition of this approval was the construction of a left hand ghost island road access for HGV traffic, to and from the A140, with 70m visibility splays in both directions. (Ref. C/7/2007/7037)

This was followed shortly afterwards by the addition of a water storage reservoir for use as part of a pumping scheme. Conditions related to the construction of the water reservoir were discharged later in the same year, including the completion of an archaeological Written Scheme of Investigation, and acceptance of a 5-year post-restoration maintenance period. (Ref. C/7/2008/7010 and C/7/2008/7039)

Permissions were then extended in 2009 to allow the importation of material for use with the aggregate bagging plant. Reduced yield from the northern section of the site may have been a consideration in this decision. (Ref. C/7/2009/7008)

### Southern extension

Plans for gravel extraction on the southern part of the site originally included three new areas, with references MIN 79, MIN 80, and MIN 81, as shown on the site allocations map overleaf. It was anticipated that these would be worked in sequence, starting with MIN 79.

The main planning application for gravel extraction on the southern part of the site was approved on 2nd October 2015 for a period of up to six years, until 31st December 2021. It required progressive restoration of the site by 31st December 2023. (Ref. C/7/2014/7030)

This introduced a new purpose-designed HGV crossing point part way along Mangreen Lane, to give access to and from the southern part of the site. It also identified an under-yield of mineral output from the northern part, and stated that the under-yield had led to an estimated loss of one year's output, with an implied risk of early closure.

Approval for gravel extraction on the southern part of the site was limited to the area of MIN81. By implication, it would then be very difficult to continue with MIN79 and MIN80, to the south of MIN81. No planning applications have been submitted for extraction on those two sites, and in December 2018 they were withdrawn from the site allocation process.

### Norwich Main

A number of planning applications for the Norwich Main site have been approved over the years. Much of the installed equipment is above 16.5m in height. (Ref. C/7/2000/2003)

A more recent application has taken advantage of the independent HGV access route to and from the A140, for installation, and for long term maintenance. (Ref. C/7/2018/2017)

There is no evidence of any major issues having being raised over the last 25 years in connection with the installation of equipment with a height of more than 16.5m.

