

**From:** Katie Taylor [REDACTED]  
**Sent:** 08 February 2019 19:59  
**To:** Hornsea Project Three  
**Cc:** Beverley Wigg  
**Subject:** Deadline 6 February 8th 2019 submission from N2RS

Please find enclosed a further submission from N2RS under deadline 6.

Regards,  
Katie Taylor

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HORNSEA THREE  
FURTHER SUBMISSION FROM N2RS  
DEADLINE 6

Subject

Local cumulative environmental impact assessments of the cable route on landscape, tourism, traffic and recreation.

I refer to:

- Orsted Environmental Statement Non-Technical Summary: PINS Document Reference: A6.00 APFP Regulation 5(2)(a) - May 2018
- The Environmental Impact Assessment (Environmental Statement) by Vattenfall & Royal HaskonigDHV Ref PB4476-005-033 - June 2018

The two infrastructure projects (Hornsea Three & Norfolk Vanguard) cut across each other in Norfolk and both projects are currently undergoing inspection under different examination panels. We understand that the inspection panels for the two projects do not consult with each other on areas of overlap.

Whilst both wind power companies are working to the legal requirements (subject to approvals by the examining authorities involved) it is not easy for residents to understand clearly the impact of the projects in the location of areas where disruption could be particularly significant. It is even harder for holidaymakers and people working in the holiday business to be aware of the potential disruption which could take place over a period of 5-7 years.

I draw to the attention of the Orsted Examination Authority that a cumulative impact assessment undertaken by Vattenfall in June 2018 sets out a number of activities that cut across both projects, notably the intersection of the cable routes.

In this report, Vattenfall summarised areas where there is likely to be a cumulative environmental impact for example on tourism and recreation. This would be a welcome piece of information for the general public if it weren't for the fact that it was incomplete. The gaps in information are in regard to the Orsted Hornsea Three project. Despite the absence of information, Vattenfall made some judgments on the extent of the cumulative environmental impact in the area where the two projects intersect.

As a general aside, one would assume that the more complete the information is, the more accurate the impact assessment will be. But Vattenfall's assessment lacks information such as:

'the timings of the works for Hornsea Three'

'insufficient information being 'in the public domain regarding final scheme plans'

'uncertainty on the exact location and manner of the crossing point'.

N2RS takes the view that if there is insufficient information available for whatever reason, that a cumulative impact assessment cannot contain a valid set of judgments. This holds true in any area of work where impact assessments are required. The greater the clarity, the more useful the impact assessment is.

In Orsted's Environmental Statement (7.5.1.4) it says:

'During the construction phase, the onshore cable corridor **would result in temporary short-term landscape and visual impacts** which would not be significant. Impacts on landscape character would arise as a result of construction activities such as the digging of cable trenches, HDD works and the removal of short sections of hedgerow and some individual or small groups of trees. However, these impacts would be local in nature, **over the short term** and reversible, with Hornsea Three committed to re-instating landscape features (e.g. hedgerows) following construction. However, some character areas are more sensitive than others, such that effects on landscape character are considered to range from minor adverse to negligible significance (not significant in EIA terms)'.

N2RS is concerned that the judgments on environmental impact are somewhat flawed in not defining what 'short term' means. We have been led to understand that if Orsted chooses to undertake this work in two distinct phases (with a proposed 2-year gap as it has suggested in meetings) the term 'short term' could be anything from 5 to 7 years.

Whilst Vattenfall has confirmed that it will employ a single-phase East-West cable run for Vanguard and Boreas and it has made a commitment to HVDC, Orsted has made no such commitments on either transmission or phasing. We do not believe that a project of this magnitude should be allowed to keep its options open during the crucial period of inspection and public consultation. To allow such latitude to go unchallenged is not in the public interest in our view.

We therefore hope to see further scrutiny of Orsted during the remainder of this examination focussing on why key decisions are being deferred and whether Orsted's cumulative environmental impact assessments in relation to the cable route are fit for purpose.

Katie Taylor

N2RS