

From: [REDACTED]
To: [Hornsea Project Three](#)
Cc: [REDACTED]
Subject: Written submission
Date: 25 March 2019 20:12:32
Attachments: [Cllr Steffan Aquarone Representation to Orstead application.pdf](#)

Dear Sir/Madam,

Please find, attached, my written submission following my verbal representation this evening.

I trust this will be accepted as a relevant representation by the Examining Authority. Could you kindly confirm this upon receipt.

Warm wishes,

Steff

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Steffan Aquarone

[REDACTED]

Representation from Cllr Steffan Aquarone

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25th March 2019

1. Prioritising HVDC

I understand the significant uncertainties surrounding the proposed development, although we believe the risks to be within the normal range for an engineering project of this scale and the potential profitability of the scheme overall to be within a normal risk threshold for energy generation construction.

There is a degree of debate around the merits of DC or AC as the most appropriate transmission technology, about which we lack the specialist knowledge effectively to contribute. It is, however, abundantly clear that High Voltage DC transmission would significantly reduce the deleterious effects of the development overall, and in particular in connection to our local area. It is, I understand, an emergent technology at this industrial level in Europe (see https://en.wikipedia.org/wiki/List_of_HVDC_projects#Europe_2), and as such could well develop further between the application and the final choice the developers make.

I believe it is highly likely that the Secretary of State will grant an order permitting the option for either AC or DC, although I urge them to challenge the developers' claim that there are relatively few examples of HVDC being used for long-distance transmission between generation and the grid. Our research, including the above link, suggests otherwise. We firmly believe that this technology is viable and preferable – even if it has a higher cost and project management risk attached.

In subjugating ourselves and the land of which we are custodians to the demands of the UK's energy consumption we would like to be a driver, not a passenger, in progressive technology development. The Hornsea 3 development could contribute significantly to the development of HVDC transmission in other schemes and have a lasting, positive impact on the manner in which energy developments are built with minimal damage to the countryside. I consider it to be DONG Energy's duty to us, and in its commercial interests to use -- and be seen to use -- the best technologies, not just the most tried-and-tested or cost-effective.

I therefore urge the developers, and failing that the Secretary of State, to make it a condition that HVDC be explored as the preferred method even if it is more

expensive. This could involve a condition being included that requires HVDC to be the transmission method in question so long as it adds no more than an agreed percentage to the onshore cable proportion of the project either in risk or known cost. This would go some way to potentially removing point three below, completely.

2. Mitigations of impact of HVAC booster station

There are very few rural services in North Norfolk and precious little economic activity beyond tourism. The quality of life and the beautiful natural environment we enjoy are what people get instead and this could be significantly eroded by the developers' plans if mitigation steps are not put in place. 97% of residents said that improving the natural habitat after construction was finished was “important” or “very important” - the strongest response of all the issues covered and the answer that had the greatest consensus (standard deviation: 0.56). 95% furthermore said that the natural environment has a lot to do with their quality of life.

Noise and vibration

Currently the developer proposes noise and vibration mitigation that reduces the noise impact of the booster station to “acceptable levels”. We have seen no evidence that these levels are respectful of the fact that, at night in North Norfolk, the environment is virtually absent of any background noise or vibration interference whatsoever. Nor are we confident that background studies have been carried out at sites close to the proposed construction.

I insist that the required noise and vibration levels within 500m of the proposed booster station are set at the current background levels at those locations on a clear night.

I believe that the available mitigation options should be able to reduce noise and vibration well below statutory levels – and that the extraordinary nature of this development means it is quite appropriate for entirely subjective levels to be set.

96% of residents said that ensuring the booster station couldn't be heard nearby was “important” or “very important”, making it the highest rated issue relating to the booster station, and the booster-station related issue whose response had the greatest consensus (standard deviation: 0.67). As it stands, it is still unclear whether

the current background noise levels were sampled in appropriate places, or by suitably independent third parties.

Decommissioning

I seek reassurance from the developers that any potential booster station will be adequately demolished and removed at the end of its working life and the land restored.

The HVAC booster station will be of significant and long-term detriment to our area, and our area alone – and the best in class mitigation practices should be deployed, however costly. For the avoidance of doubt, our proposal in point two above should require the cost comparison to be inclusive of the cost of mitigations to the booster station in the case of HVAC.

3. Community investment

Where a local community is bearing a particular local burden resulting from the provision of national infrastructure, that local community should not only have its views represented but also receive some form of balancing payment.

Many members of our community do not believe that financial compensation alone can provide adequate or appropriate reparation for the overall effects of the development. We urge the developers to consider alternative, innovative ideas – a very small selection of which include: (a) reduced electricity costs for people affected; (b) cash payment equivalent to reduced electricity cost over a period of years or while in occupation of the affected property; (c) the laying of ‘dark fibre’ along the full stretch of the route, with access points every few km – the only way that, free from the UK Government having appointed a single supplier to carry out broadband infrastructure upgrades, local communities can invest in their own properly high-capacity internet service provision -- as has been done in the North of England by B4RN; (d) electric vehicle charging points at key points throughout the district; (e) installation of small cell technology to improve rural mobile phone coverage.

The sums involved in any of these initiatives would probably be small in relation to total overall cost (and point (d) could even provide the company with a future income

stream); but also that the principle has wider application and, once established, could be used in other similar projects by affected parties.

4. Inadequate Representation and Consultation

I entered in to this process in the hope that a transparent, open and understanding consultation would be carried out, where local residents had their concerns listened to and addressed, and that at the end of it an application would be made which I was able to support. However, as the process has gone on my faith in it has been drastically reduced.

The 'Interested Party' system seems inextricably broken. Elected representatives are unable to represent their constituents, and instead their views are lumped into single submissions by Councils as a whole. This threatens the legitimacy of the whole process, and it seems that at multiple opportunities there has been obfuscation and intervention which has prevented a fully transparent consultation.

In addition to this, a basic requirement of publishing notices of hearings appears to have been at best inadequate and at worst illegitimate. Orsted have challenged the evidence of the eyes and ears of residents and Parish Councillors, who tell them bluntly that notices do not exist in places that they argue they do. This has been seen in Weybourne, where the Beach Road car park - a wholly sensible place to put a notice - appears not to have had one, despite Orsted claiming it has. This inability, it seems, to fulfill a basic and really very simple requirement of this consultation process leads me to questions its suitability as a whole.

Finally, the recording of the last Open Floor Hearing, at which such serious concerns were raised that it was felt necessary to call this one, is yet to be published. It took 11 days for the recording of December 3rd's meeting to be published. It is now nearly two months since the last OFH, and there is no recording on the Planning Inspectorate website. However, recordings of all the Issue Specific Hearings which occurred in that week, all of which were considerably longer than the OFH, do appear there. Interested Parties and other concerned locals will have had valid reasons for being unable to attend, but are now unable to catch up on what they missed and hear the concerns being raised and the answers given.

I am passionate about green energy, and I believe that we need to introduce more of it if we are going to save our beautiful planet from the catastrophe it is nearing. However, sidelining elected representatives, failing to hear local issues and lacking the necessary transparency will never be acceptable. While I am supportive of the greater green energy infrastructure, and of Norfolk leading the way, I am afraid that due to these issues raised I am unable to support this application.