

**Edgefield, Bodham, Corpusty & Saxthorpe, Hempstead and Plumstead Parish
Councils (and others) joint submission to DONG Energy in relation to the
proposed Hornsea 3 offshore wind farm development and associated onshore
booster station and cable corridor:**

Dear Sirs/Mesdames,

We the undersigned are members of the communities of the parishes of Edgefield, Bodham and Corpusty & Saxthorpe, and their elected representatives. We are writing to you, variously: from our positions of office, formally on behalf of our Parish Councils, and on behalf of more than 100 local residents who have responded to our surveys about the impact of the proposed cable route and HVAC booster station.¹

We wish to stress that we are not overall opposed to the development of Hornsea 3: only 36% of respondents said they felt it was very important to stop this type of development happening in Norfolk, and 78% said they were generally in favour of alternative energy developments.

We have, however, strong concerns about the current proposals that we wish to have heard. Our voices as members of the local community are somewhat powerless in the face of infrastructure projects of this national significance.

Responses to the question of whether local feedback would lead to the plans being adjusted were the most varied: only 47.4% felt they would, with a standard deviation of 1.43. We are therefore appealing directly to DONG Energy's company ethics as well as the initial statutory purpose of the Planning Inspectorate in identifying and acting on key issues resulting from this consultation.

¹ Our approach to gathering representative feedback from residents was to use a tried and tested 'knock and drop' survey method. This involved community volunteers visiting every household in a given village and explaining the purpose of the survey to residents before asking them to respond within an hour-long period, after which they returned to collect the results. The completion rate was close to 100%, reinforcing this method of gathering local views as one of the most representative available, and as a result respondents are referred to as "residents" in our letter.

A total of 104 completed surveys were received of which 1 did not want their responses to be included. The calculations in this document have been based on those of the remaining 103 that provided a response to the question concerned. Surveying was carried out during the week commencing 4th September 2017. 11% of residents were not aware of the of the plans to build a booster station at Little Barningham and a further 28% had only heard mention of them.

We believe that each of our concerns can be addressed through appropriate consideration and investment by the developers and we have avoided suggesting anything that is excessively prescriptive or clearly unachievable.

We very much hope that our concerns will be taken seriously so that we can support this opportunity to make the UK's future energy supply more sustainable.

Yours faithfully,

John Seymour, Chair, Edgefield Parish Council, formally on behalf of Edgefield Parish Council

Graham Sinclair, Vice Chair, Corpusty & Saxthorpe Parish Council, formally on behalf of Corpusty & Saxthorpe Parish Council

Pat Cubitt, Chair, Bodham Parish Council, formally on behalf of Bodham Parish Council

Norman Lamb, MP for North Norfolk, Chair of Parliamentary Science and Technology Select Committee

Steffan Aquarone, Liberal Democrat County Councillor for Melton Constable Division

Georgie Perry-Warnes, Independent District Councillor for Corpusty & Saxthorpe Ward

Plumstead Parish Council

Hempstead Parish Council

1. Unacceptability of 'phasing' that requires the same sections of cable corridor to be dug up more than once

We understand that the current commissioning process for projects of this nature could involve consent being granted to the developers in up to three phases. This would involve the digging up of, what is effectively, the same ground along the entire cable corridor up to three times during the length of the project, adversely affect its

economic viability, and unnecessarily delay the upgrading and expansion of the nation's electricity supply.

This is clearly a ridiculous waste of money. But more importantly, it means all of the negative consequences of the cable corridor will be multiplied and the long-term damage to the area made significantly worse. The effects relate to traffic, tourism and road safety – and above all, the permanent damage to the natural environment.

Whatever route it takes, the cable corridor will inevitably involve disrupting areas of unspoiled natural beauty, habitat loss (hedgerows, hedge margins, meadow, wet and ancient woodland), associated habitat fragmentation and the high potential for water pollution (due to soil and nutrient loss to watercourses). We recommend referring to the report produced by the River Glaven Conservation Group for a detailed and thorough explanation of the many significant environmental issues along the route.

Several areas of the proposed cable route are areas of High Landscape Value, as well as being subject to deliberate and managed conservation. There is a wide variety of flora and fauna, even in the most apparently straightforward North Norfolk field, the quality of which can only really be appreciated through year-round observation. North Norfolk hosts a significant amount of wildlife, from barn owls to deer, hares and birds of prey including kestrels, buzzards and kites, as well as rare flora and fauna. The natural conditions which make this area of the UK so suitable for wildlife have been preserved for generations, and are unique in the extent to which they have resisted urbanisation, industrialisation and the ensuing noise, light and atmospheric pollution.

Furthermore, the Corpusty & Saxthorpe Parish representatives and landowners adjacent to the proposed site of the crossing of the River Bure and its adjacent water meadows are concerned that these environs receive special attention. To mitigate any environmental impact on these, surrounding ancient hedgerows and a domestic water well it is respectfully requested that HDD under-drilling be utilised for approximately 600m length at an appropriate depth below the base of the water well.

The above concerns are all grounds on which to object most strongly to the idea of any such development whatsoever carving a decade-long scar through the

landscape. Indeed it is extremely rare for a community as wide and representative as the one made up in the signatories of this letter, to come out cautiously in support of something so catastrophic for the local environment. We are, however, understanding of the need the country has as a whole to develop sustainable sources of alternative energy. But we are also mindful of the need to protect and preserve this beautiful and unique asset for generations to come for the benefit of residents, workers and visitors alike.

We are reassured to read that the consultation process will give due consideration to the negative impacts of the development on the natural environment. There must, as part of the granting of consent for this development, be a guarantee that the best modern engineering practices (not just the statutory minima) are adopted to repair the effects of the development on the environment and reinstatement of soil, water, flora, fauna and habitats.

Nothing will ever be able to be restored completely: no amount of soil stratification will be able to reinstate the balance of soil that has been known and worked by the people here for generations. Visual reinstatement – itself something that takes years – is only one part of the picture.

To support this development happening at all has taken patience, understanding and significant compromise, but to allow it to happen three times is patently unacceptable. Minimising the number of times the same areas need digging up had the strongest consensus of all issues connected to the cable route: 95% of respondents rated it as 4 or 5 (out of 5) in importance, with standard deviation of just 0.61 across all responses. Everything that stands to be lost by the construction of the onshore component of this project will be significantly worsened if the work along each point of the cable corridor is not carried out once and once only, quickly and efficiently, and the land reinstated thoroughly and permanently.

Whether it is within the control of the developers, or something that only Government can change, we will object vociferously and unendingly to any development consent order that is granted without absolute assurance that individual sections of the cable route will not be 'dug up' on more than one occasion. At the very least, alternative

ideas should be explored such as laying all ducting in the first phase so that the land does not need to be dug up more than once.

We are utterly dedicated and passionate about this aspect of the proposed development, and will defend our land at all costs – as we have done in the past.

2. Prioritising HVDC

We 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, we 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.

We believe it is highly likely that the Secretary of State will grant an order permitting the option for either AC or DC, although we 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. We 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.

We 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.

3. Mitigations of impact of HVAC booster station

At present, based on the drawings, descriptions and 3D models we have seen, there are no mitigating measures planned around the construction of the HVAC booster station at Little Barningham and this is simply unacceptable. The potential height on its own would create an eyesore that could significantly undermine the quality of life of people living in, and passing through, the area. Not to mention the noise.

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.

Visual

The proposed 12.5m structure will be visible over hundreds of hectares, including from all neighbouring villages, and a significant length of the Holt road. We do not recognize the visualisations we have been shown by the developer based on our local knowledge, and we will undertake experiments ourselves to see the true distance over which the structure as currently planned would be seen. Significant height mitigations should be volunteered by the developer or required as a condition of the order, to reduce substantially the relative height to the extent that it would be

similar in size to other aesthetically limited constructions in the local area: only churches remotely approach the height currently proposed. We urge the developers to consider ideas for this – a very small selection of which include: digging out the foundations so the building starts at a lower level; using the soil to create a bank around the construction and planting the scheme with trees.

We note the lengthy disclaimers attached to the developer's visualisations and feel they are therefore an ineffective tool to understand the visual impact of the booster station from different viewpoints. Physical demonstrations would be required in order to understand the true visibility of the proposed construction.

77% of residents said that ensuring the height of the booster station was kept to a minimum was "very important" and this is an area we hope the developers will consider seriously before making their application - at present no mitigations whatsoever are proposed and this is clearly unacceptable.

We have been informed that flood lighting will be needed on site to provide safe working conditions at night in the event of emergency. We accept this, but do not understand why this lighting needs to be motion-sensitive. For the purposes of security we understand remote monitored, motion-sensitive, infrared cameras would be equally effective and request that any flood lighting be manually triggered either remotely or from on-site so as to prevent any eventuality where the night sky in this remote and rural area is illuminated unnecessarily.

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.

We 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.

We strongly urge the developers to provide detailed noise and vibration mitigation steps as part of their application, rather than leave any doubt whatsoever that the targets will be adequate. If local people are being dragged into a national infrastructure project with no way of knowing what the impact will be, and with no formal powers of recourse, then the enforcement of rights will only be able to be fought for *post hoc* by residents through protest and inconvenience once the DCO has been granted. It benefits everyone for the precise specification of “acceptable levels” to be disclosed upfront – and at a level that is agreeable.

We 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

We 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.

4. 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.

We believe 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.