

**From:** [REDACTED]  
**To:** [Norfolk Vanguard](#)  
**Subject:** Submissions for prelim Hearing 10th Dec Attn Tracey Williams  
**Date:** 03 December 2018 11:45:31

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Dear Ms Williams.

It is my intent to attend both the Preliminary hearing and the open meeting on 10<sup>th</sup> dec.

I shall submit requests for the open meeting under a separate email. Below are the points I would like addressed during the preliminary hearing, either by my being asked to voice them at the appropriate time, or as an acknowledgement by the EA of the queries, at the time, followed by their response.

**Item 3. Annexe B Nature of proposed development & Visual impact subsections & CA**

Though I intend to speak on this matter with regard to the application itself, at the open meeting this evening, Could the EA please advise as to what weight will be given to the applicants level of inclusion of the Horlock rules on substation design, in their mitigation of the visual impact of the development from a DESIGN perspective.

Given that this will be the akin to the addition of THREE nuclear power station substations to pre-existing infrastructure, surely the Horlock rules are of paramount importance.

With regard to the Compulsory Acquisition element of this item, could the EA also please confirm that they will be seeking full disclosure from the applicant with regards to the reasons behind dismissing the land 200m or so closer to the National Grid expansion location, which the land owner was willing to sell, which would have avoided the need for Compulsory Acquisition altogether.

**item 4 Notifications relating to nomination of locations for site inspections**

Could the EA please define a format for the submission of nominations for site inspections and clarify the purpose for the inspection.. i.e. a viewpoint towards the development, areas likely to flood as a result of run-off, etc. or are these restricted for a given purpose?

**Item 6 Other procedural matters.**

Could the EA please explain if there is a cut off, where a member of the public finds crucial information missing from the applicants documentation, that should reasonably be expected to have been submitted by the applicant when available (even if after a deadline)... this is requested so that the observant public, who may have been advised by the applicant that something was in the submission, which then transpires not to have been provided, should be able to submit information, in good time, to the EA, for inclusion such as specific reports or common knowledge events, previously brought to the attention of the applicant...

Can the EA please explain under what criteria such submissions by the public are considered for inclusion... this is asked, as it is not the remit of the public to carry out investigations, especially those relating to safety and it is the view of this member of the public that the omission of reports or investigations in the submission by the applicant, should not have them excluded, should the information be available during the course of the EA consideration, or that of the secretary of state.

Kind regards

Julian Pearson



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**From:** [REDACTED]  
**To:** [Norfolk Vanguard](#)  
**Subject:** Intention to speak at Open meeting. Evening Mon 10th Dec.  
**Date:** 03 December 2018 13:37:21

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My interested party registration is 20011524.

In my registration of interest, I referenced each of my points and repeat them here, together with how I would wish to expand upon them... in the event that others have touched upon these subjects, I will acknowledge that the point has been covered and only mention any additional elements not mentioned by the time I am selected to speak... I have collated my points with Holme Hale Parish Council, though my co-councillor, Mr Andrew Scarlett has far better local knowledge of the village than myself with regard to item 1 below and the visibility of the development from the main village as I am a relative 'newcomer' arriving only 8 years ago and living on a farm a mile or so outside of the main village

1) The "Viewpoint 11" taken at IP25 7EE used the presence of woodland to mostly obscure the view of the development. whereas, less than 200m to the east, the entire development, along with the existing substation, would be openly visible in full... The expansion of this, would be that further viewpoints have been found to have changed and there is contradiction between the Theoretical visibility map, which clearly shows the majority of the area in 'Highly Visible' blue shade, which includes almost the entirety of the village of Holme Hale, yet the text of the document plays this down, referring to a viewpoint by St Andrews Church, taken when the vegetation was overgrown and a hazard to the road and awaiting heavy cut back. Additionally, the 'FlipBook' photomontages available on the Vattenfall website included only those for options 1 and 4.. there was no photomontages for option 2, which is the option chosen by Vattenfall.

2) I referred to visual impact mitigation. Since submitting this, I have been provided with details of the Horlock rules <https://www.nationalgrid.com/sites/default/files/documents/13796-The%20Horlock%20Rules.pdf> (please note the source of this document, which is delightfully short and very specific at Section 3 (Guidelines), Sub-section 7 (design) notes 1 through 7 and I feel that as an established set of parameters, available through a source such as the National Grid, should have caused Vattenfall to have included their suggestions from the very first conceptual discussions of the project for the onshore substation. Sadly, we have had nothing put forward other than mitigation planting, which would take longer to mature than Vattenfalls own predictions for the lifetime of the buildings and infrastructure... EVERYTHING we have been provided by Vattenfall has failed to indicate any consideration of these rules and the only thing we HAVE had, are 'promises' that they take mitigation seriously. The evidence suggests otherwise.

3) The omission of Option 2 Photomontage from the flipbooks, through to a complete refusal to supply the 3D plans for the development (including a request from George Freeman, our local MP) led me to create my own, utilising information available on the Vattenfall website. I would like to know if the ExA has been given full access to the 3D "representations" by Vattenfall which WERE made available for the BOREAS public consultations and so should be submitted as visual aides to the ExA for the Vanguard consideration.. and if so, would like to point out a few observations..

a) That although I appreciate there is a complete lack of LIDAR data available for the actual site, it IS available for the area to the North and south of the development, including the entire villages of Necton, Holme hale and Bradenham, together with some of the woodland thereabouts. This could easily have been imported and used as a point of reference for accurately portraying the existing hedgerows and woodland around the development site, as the hedgerows are all trimmed,

under contract, at between 6ft and 8ft, due to the environmental schemes they are under, and the woodland copse's are all of a similar maturity. Instead, Vattenfall chose to use mature height evergreen pine trees to 'mitigate' the views of the development.

b) There is a complete lack of a 'point of reference' to assess the size of the development. Even the perimeter fence used in the 'representation' is a style used in towns and cities to surround parks and gardens, and is usually around 4 to 5 ft high.. but careful observation would show that the fence in the representation is THREE METRES high, so the perspective is thrown off, making the development appear MUCH smaller than it is. In my own 3D creation, using the same software that I believe was used by Vattenfalls agents, I included a London double-decker bus, and have previously submitted a snapshot of the development to the planning Inspectorate, though it would appear not to have been published on the website. I have taken the liberty of bringing additional copies of those snapshots, but in short, the development would take more than 45 busses parked end to end, then stacked up, 5 high, making a 'wall of a total 220 London Double decker busses, to obscure the long side of the combined Vanguard/Boreas development (110 if only considering Vanguard). It is my personal opinion that the developer has deliberately sought to downplay the enormity of the development and I respectfully request that the ExA call in the Vattenfall 3D application for their own information, and will accept my own representations (KMZ file also already provided to the Planning Inspector but not yet available on the website) which will, by the time of the open meeting, be updated with part of the development having had application of the Horlock rules, to mitigate visual impact, so that the ExA can visualise the significant and immediate effect that they can provide.

4) I referred to an F16 plane crash in 1986.. a "Common knowledge" event. Sadly missing entirely from the submission for Vanguard, yet is felt important enough to be addressed in the PEIR document for Boreas. Claims that Vattenfall were only made aware of this at a late stage, is no excuse for it not to have been submitted at the same time as other documents submitted by them, after the initial deadline. Such is the potential risk to the safety of construction workers and to local residents, I respectfully ask that time is given to the environment agency to commission an INDEPENDENT assessment. it transpires that the local authority was not aware of the due process at the time and only in the past few months, with the assistance of Jenny Smedley, has both the Breckland District Council and the Environment agency triggered that process. It is my opinion that relying on the Vattenfall 'Discovery of contamination' procedure, proposed as a solution by Vattenfalls Liaison officer, is a conflict of interest and as the potential contamination may not be visible, nor of a type commonly expected, that specialists in post air crash contamination are allowed to undertake a full survey and deep soil analysis, so that it can be assessed by the Environment Agency, and for them to make a declaration of the findings and declarations to the ExA.

5) Choice of local site:-There has been no detailed explanation as to why the land, a few hundred metres away from "Option 2" proposed, which is actually closer to the national Grid infrastructure, immediately on the path of the proposed access road for Option 2 AND within a 20m "Dip" in the landscape, that would have almost entirely concealed the development to all but those travelling along the A47 and which the landowner was willing to sell, has been dismissed, despite it clearly meeting all but a single one of the declared requirements... and the remaining one requirement (Engineering) being the information withheld. It is the opinion of many, that the only reason is one of cost of development. However, given that the budget for the whole proposal, originally included multiple relay stations for an AC solution, it is not unreasonable to expect some of the money saved from those relay stations no longer being needed, to be spent on the relatively small sum (in the greater budget) of the difference in cost of the groundworks, especially as the earth moved can be used to further conceal the development, once planted up.

6) At no time has there been any detail of the national Grid expansion, other than a couple of coloured squares on a map. After some time of Vattenfall claiming it was down to national Grid, and national grid saying it was down to Vattenfall, it has only been since the submission to the planning inspectorate, that Vattenfall have acknowledged that it was their responsibility to have provided it. In essence, 50% of the overall development was barely touched on during any of the consultation or thereafter. I have written to the National Grid in the hope of obtaining the details of their engineering proposals to assimilate the Vattenfall generated power into the 400kv national grid.. will the ExA accept those details if and when they become made available to me?.. or will the ExA make representations of their own to acquire them?.. or will the development proposal be considered without any such information?

7) I referred to other substations likely to be demanded by future wind farm development in the North Sea.. there are likely better informed people wanting to speak on this matter, but it would be good to know what influence the ExA could have, on requesting the National Grid proactively seek an extremely discrete location elsewhere on the 400kv network, that can use the local topology in it's design from the foundations up, rather than rely on existing locations which did not foresee the significant expansion of renewable power and it's need to connect.

8) I referred to local drainage issues in Necton, exacerbated by the Dudgeon wind farm substation development and which will only be made worse by further development, unless significant works are funded to allow Anglia water to overcome the issues presented. Others will have more local knowledge than I, but would the ExA please consider flooding mitigation as a condition, if consent is granted, which can only be signed off by Anglia water as the specialist agency?

In my summing up, I made a request, should consent be granted. I have been a 'Troubleshooting' Programme and Project Management contractor across multiple industries, for the past 20-odd years. A common KEY failure of requirements, has been the omission of MEASURABLE acceptance criteria when considering if those requirements have been met. I am delighted to see that the sound mitigation has a measure of "35db at the nearest occupied dwelling". It is my sincere hope that the ExA, in their recommendations to the Secretary of state, in the event that they consent to the proposal, will set absolutely clear, unambiguous and measurable acceptance criteria on ALL the conditions they lay down, so that it avoids any difference in opinion in interpretation by those parties which will act on behalf of the Planning inspector, in signing off those conditions as met. I would be delighted to offer my experience, free of charge, to the ExA to assist them in selecting measurable acceptance criteria for any conditions that they impose on any consent to develop, without any input on what those conditions should be.

Kind regards

Julian Pearson

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[REDACTED]

