

Why meticulously research and plan to build national infrastructure next to a village when alternative areas could have been fully scoped out at the start? Even the National Grid's Horlock rules advise avoiding populated areas where possible.

Necton was the only option considered because of the nearby National Grid connection. The Horlock Rules are cited throughout Vattenfall's Environmental Impact Assessment Scoping Report as follows;

234. "Consideration is given to placing the electrical infrastructure as close as possible to the existing National Grid connection point (if feasible) in order to minimise the landscape and visual effects associated with introducing new electricity infrastructure to the environment..."

But, in the introduction 1.1.2, 10. states "..... Within these search areas are *sensitive features that will be avoided where possible* see Section 1.5.6..." (Horlock Rules 235. **1.5.6**.....which include "Community; Proximity to residential properties; ..... and Sensitive land uses, e.g. schools, hospitals.")

But in the next paragraph they state; 11. "....*The substation search area is in the parish of Necton.*" Vattenfall imply that they adhere to the guidance of Horlock Rules, but it is only in part, as they have not avoided sensitive features as not looked at alternative sites.

Surely planning rules and human rights laws should be weighed against this proposal and more appropriate locations further away from Necton should be sought.

I think the proportionality of this undertaking needs justifying. I have looked at the publication Human Rights: Human Lives Local Authority Publication.

The rights in Articles 8 to 11 can be restricted, the Convention recognises that there are certain situations where a state is allowed to restrict individual rights in the best interests of the wider community".

*"But the interference must be necessary (not just reasonable) and it should be 'proportionate' – that is, not more than is needed to achieve the aim desired."*

"– Article 8 is one of the Convention rights that requires you to strike a balance between a person's private rights and the needs of other people or society as a whole."

Proportionality. "The principle of proportionality is at the heart of how the qualified rights are interpreted..."

"The principle can perhaps most easily be understood by the saying 'Don't use a sledgehammer to crack a nut'." The inland infrastructure is excessively intrusive, destined to be the largest area of substations in the world to be built next to a small rural village. Why should Necton be so disadvantaged? The lives of people living in Necton will be adversely affected, amenity and homes devalued. Necton is a community of families and a large retired population. who choose to live in a rural location. This is surely a prime example of 'Using a sledgehammer to crack a nut!'

Human Rights Protocol 1, Article 1 protects your right to enjoy your property peacefully. Dudgeon substation produces an "acceptable" level of background noise but with additional larger substations it would be very difficult to remain within the legally required noise limit. Extra noise, both operational and during the years of construction is unacceptable.

During the pre-application consultation stage and consultation stage Vattenfall tried to "sell" the project by stating it will bring jobs and prosperity to the area, but how many local people will have the necessary skills to benefit from this type of employment? How can 70 acres of substation enhance the village even if Vattenfall provide funding for some community projects?

Vattenfall state "In the case of the Norfolk Vanguard and Boreas projects, the assessment of options was carried out over a period of several months in late 2015 and early 2016, with the active participation of both National Grid and Vattenfall. But was there consultation with the Parish Council or the local residents who will be directly affected by this at that time? This site was decided on without being shaped by local knowledge, this must surely contravene article 6 of the Aarhus Convention.

"Article 6, paragraph 1) Requires Parties to guarantee public participation in decision-making with a potentially significant environmental impact",

"Article 6, paragraph 4) Requires that public participation take place early in decision-making".

"Article 6, paragraph 8) "Parties must ensure that decision takes due account of public participation".

At the "workshop" of 19th July 2017, Vattenfall ran through its criteria that "it has developed four alternative footprints for the substations within the refined search area. The design of each footprint was an "engineering led process". Key considerations included:

- Routing of incoming and outgoing cables from each substation
- Known environmental sensitivities and constraints
- Land ownership boundaries"

At this meeting I was very alarmed that there was no mention of avoiding populated areas, this was not included in this initial list of priorities, which I found alarming. The schedule on the invitation included opportunities for group discussion but this was not allowed. On conclusion the experts were not prepared to take any questions from the group, instead we were asked to write our comments on 'post it notes' and attach these to 4 sheets of paper on the wall, one for each "footprint" to be documented.

Vattenfall's visualizations were not drawn to scale making it difficult for people to grasp the true impact of the proposals. Vattenfall sent out publications to households but later apologised for publishing the wrong view. The corrected version showed very small distant structures saying "this view is not an appropriately scaled photomontage." Misleading and inadequate. I would like to see plans and maps drawn to scale showing the village and substation on one image, so the proximity and size of substation in relation to the village is obvious.

On 20<sup>th</sup> July 2017 there was a "public drop in event" and on request residents were shown the potential view from their homes, using computer generated images (like google earth). They showed Norfolk Vanguard placed in four different positions with substantial planted screenings to disguise the visual impact, but they omitted to include the very large NG extension in their projected images as they "didn't know what it would look like!" Surely some attempt to show something of an appropriate size should have been included for accuracy.

I spoke with an expert about an alternative site but she was very dismissive. As they had invested heavily in researching the Necton site they wouldn't consider another site now. I was shocked and said "It's a fait accompli," and she agreed!

One of the main mitigation measures offered by Vattenfall is planted screening to hide the 80m tall structures, disguising the 70 acres of substations so there is no adverse visual impact. Indigenous tree species would take 20-30 years to reach mature height, (some non-natives faster growing) but as Vanguard would be built on some of the highest ground in the area it would be impossible for trees adequately hide it from view.

The combination of many inaccuracies makes me question Vattenfall's findings and their competency.

Necton Substations Action Group put forward two alternative sites for Vattenfall's consideration, but they dismissed them after cursory investigations for the following reasons.

The "Scarning Site" is technically viable, but would cost more; Vattenfall stated "There is not a compelling environmental case for selecting the alternative scheme in preference to the Necton solution" (but this is not relevant as environmental issues are not in dispute) and Vattenfall's reply summarized "Scarning site" as "a large, sparsely populated area of land to the east of Necton". They then argue "the primary result would be to move the impacts to a different location thereby affecting a different group of residents", but in their own words they have just described it as "sparsely populated area" (unlike Necton which is a larger community) and there are no sensitive receptors i.e. village school close by.

The other preferred location would be at Top Farm which has been offered to Vattenfall but they refused to purchase. We need further information about why this site has been declined. Compulsory land acquisition would not be necessary if it was moved to one of these sites.

The substation would be built on agricultural land draining into a stream, a tributary of the River Wissey, running alongside Ivy Todd farm which regularly floods, once coming through the house, so flood risk needs emphasising and given due consideration.

The small distance of dry summer corn fields between the substation area and Ivy Todd Farm could constitute a fire risk and my mother is also fearful of terrorism, having lived through the war.

Vattenfall plan to dig through a F-16 jet crash site where the ground was contaminated, with hydrazine, carbon fibre and depleted uranium. Nearby Ivy Todd Farm was showered with small burning debris. The clean-up procedure is questionable, not all the wreckage was recovered and for 30 years it has only been ploughed to a depth of 10 inches. It would be irresponsible to dig into this contaminated area as could constitute a risk to health, especially as more than an average proportion of the Ivy Todd residents have suffered cancer.