

From: [FREEMAN, George](#)
To: [Norfolk Vanguard](#)
Subject: FAO Inspector: Karen Ridge – Norfolk Vanguard Offshore Wind Farm Post-Hearing Submissions
Date: 14 February 2019 20:21:23
Attachments: [Summary of representations from Norfolk councils, agencies, businesses a....docx](#)
[Cover letter of NSAG petition.pdf](#)
[Letter from George Freeman MP - 14.02.2019.pdf](#)
Importance: High

Good evening,

Following the Open Floor Hearing in Norwich last Wednesday 6th February 2019, I have put into writing the key additional points that I raised with the Examiners, as was requested (please see attached my letter).

I have also attached the document “Summary of representations from Norfolk councils, agencies, businesses and landowners”, as well as the cover page of a petition that was compiled by Necton Substation Action Group, and which I referred to at the hearing.

One of the earliest versions of this petition contributed to me becoming aware of this issue in 2017 (NB: Until the application for a substation in my constituency, I had received no contact from the applicant, National Grid, the Crown Estate or any public body to provide any briefing on the potential for this application or the scale of the national infrastructure coming to Norfolk) and serves to demonstrate not only how concerned the local communities are about the proposals but also how, having initially been completely against the construction of further substations in the village, the Necton Substation Action Group have become willing to take the additional Nationally Significant Infrastructure if sufficient consultation is carried out and the communities get a proper say in how/where the infrastructure is delivered.

(I have asked that the full version of the petition will be submitted separately by representatives of Necton Substation Action Group)

I request that all of this information is taken into consideration.

Yours,

George Freeman MP

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Thursday 14th February 2019

Norfolk Vanguard Offshore Wind Farm

Thank you for allowing me to have the opportunity to speak at the Open Floor Hearing in Norwich on Wednesday 6th February 2019. As requested, I am writing to summarise the key points that I raised, and which I want to ensure are considered by the Examiners.

As I set out at the hearing, I have two principal reasons for asking you to stop the Vanguard cabling and substation developments from going ahead as proposed:

1. The lack of any adequate strategic consultation with Norfolk stakeholders over the strategic Options for bringing the offshore renewable energy onto land to connect with the National Grid. (As a Norfolk MP, I only became aware of the scale of what is proposed when the specific application for the massive substation at Necton was brought to my attention by the Parish Council).
2. The lack of proper or adequate consultation or site selection criteria in the decision to place the Necton substation in the most controversial site on top of a hill, massively increasing the environmental and landscape impact on the wider area around Necton and surrounding villages.

To take each in turn:

1. Lack of proper appraisal or consultation on strategic Options for connecting offshore wind farms with the National Grid.

As has gradually become apparent, Norfolk (and Suffolk) are on the frontline of a massive national infrastructure challenge as permissions for EIGHT major wind farms off our coast are set to make this area the biggest cluster of offshore wind generation in the world.

This is clearly a major national infrastructure project with huge implications for Norfolk's coast, tourism, landscape in general, as well as the specific impact on the hundreds of acres of our countryside over which it is proposed to lay high voltage cables and place numerous substations.

To do this without any proper presentation of the Options, or consultation with stakeholders in Norfolk or Suffolk on the pros and cons thereof, is neither acceptable nor compliant with planning law.

It is for that reason that a cross-party group of MPs from across the two counties are now mobilising in Parliament to raise the lack of appropriate consultation and insist that these applications need to be reconsidered.

2. The lack of proper or adequate consultation or site selection criteria in the decision to site the Necton Substation on high ground.

The consultation carried out by Norfolk Vanguard Ltd/Vattenfall UK has been vastly inadequate in five specific areas:

1) Misleading/inadequate visual representations

There was widespread complaint and confusion in relation to the visuals that had been provided by Norfolk Vanguard Ltd/Vattenfall UK at early events (some of which were found to have significant inaccuracies). Despite requests for updated visuals to help alleviate these public concerns, particularly following the subsequent decision to commit to HVDC, a satisfactory response from Norfolk Vanguard Ltd/Vattenfall UK was not forthcoming – and large sections of the local community are still unclear as to how a new substation at the site in question will impact upon them.

The only visual guides that Vattenfall have shown the community are “artists impressions” and misleading CAD simulations from the most forgiving aspects, which do NOT IN ANY WAY represent the impact on the landscape accurately.

Having visited the proposed site and viewed it from multiple angles with the size of the infrastructure required, it is clear that there is little or no understanding in the village of the scale of what is coming.

Specifically, the applicant has shown drawings of the (smaller) substation required for an HVAC system, whilst actively pursuing a HVDC system.

The applicant has clearly misled residents and elected representatives.

2) HVAC vs HVDC

As I am sure you will agree, the decision by Norfolk Vanguard Ltd/Vattenfall UK to move forward with HVDC has significant bearing on the shape of this application and yet it was not made until very late in the day.



Given the issues surrounding the visual representations, many of my constituents feel they were not sufficiently informed to comment on the options for HVAC and HVDC during the consultation process and there is a strong suspicion locally that this was a deliberate tactic to mislead the public.

Since deciding to opt for HVDC, the applicant has ignored repeated requests from me and the Parish Council and District Councils and residents for an updated visual impact guide based on the HVDC system.

(They have also gone out of their way to insist to those who have raised it, that they can always switch to HVAC, which we do not believe is consistent with the clear advice that we understand the applicant has had from the Inspectorate).

3) Site selection

The decision to proceed with the specific site in question seems to have been the result of an arbitrary selection process. Indeed, anyone that knows the location locally is in agreement that it is completely inappropriate, being some of the highest land in the entire county and overlooking a number of local villages.

When in good faith and outside of the heated atmosphere of the local community consultation meeting I met with the applicant to ask to understand how the decision on site was reached, the applicant was unable or unwilling to explain, and instead asked their lawyer to defend the process by simply stating that they conducted a process to determine siting – without explaining what that process was or why they have disregarded alternatives sitings in the area (including one, in particular, that the local community helped put forward).

It is quite an achievement to unite so many communities with very different interests in universal condemnation of a site decision and process which seems inexplicable to anyone who knows the site.

4) The concealing of the true extent of the planned development

Although the applicant is clearing planning on a second set of cabling and a second substation for the Boreas project, this has not been clearly disclosed by the applicant.

The vast majority of local people are still unaware that a substantial part of the works being proposed in this application are to help pave the way for Norfolk Vanguard's sister project, Norfolk Boreas (for which an application will be submitted this year, and which would see another substation sited in Necton).

5) Inadequate consideration of the impact on the local economy and tourism

Necton has a burgeoning local tourism economy which is a key source of local economic activity. The applicant has treated with contempt local concerns about the impact the proposed siting of the substation will have on several holiday lets in the vicinity. Some of these lets currently rent out for approximately £1,800pw in peak season, but seem to have been given minimal, if any, consideration by Norfolk Vanguard Ltd/Vattenfall UK during their consultation process. While described as "negligible" by the applicant, these holiday lets are the livelihood of their owners and play a key part in the local economy.

Conclusion

Neither I nor the people of Necton and the surrounding villages are against offshore wind energy or the necessary infrastructure to bring it onshore.

There is in fact a willingness to accommodate additional infrastructure in the area, provided it is sited and delivered correctly. (Further evidence of this can be seen in the fact that, when the Dudgeon Offshore Wind Farm proposed constructing the required onshore substation on inappropriate high ground in Little Dunham, the community and I helped broker a deal that saw the application amended so that the substation was actually situated on low-lying land in Necton).

But the applicant in this case appears to have taken the local community and its elected representatives for fools, or for granted, seemingly safe in the knowledge that it can rely on the fact that this is national infrastructure and therefore bypasses the usual local planning processes.

But in so doing they have willfully avoided adequate consultation with the local community and its representatives, and in my submission not engaged in good faith.

UK taxpayers and energy bill payers, including the people of Norfolk in general and Necton specifically, have paid billions in subsidies to help fund these renewable energy projects and, given the impact that these proposals will have on their landscape, amenity and livelihoods if allowed to proceed, I believe that my constituents should be able to expect that they will be properly consulted and engaged with.

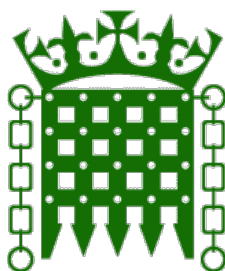
More than that, where a community like Necton is to host massive national infrastructure it should be eligible for some community benefit from the development. Instead of sitting down with the community and engaging honestly in explaining what is coming and asking where the best site would be to minimise impact, and what the community would accept as mitigating investment, which could have and could still find a resolution, the applicant has treated us all with contempt. Seemingly safe in the knowledge that the system is rigged in its favour.

I am writing to ask in the strongest and most sincere terms that you do not allow that approach to triumph, and signal the proper consultation and Options and Impact appraisal is a fundamental requirement of a successful application. Even for national infrastructure.

Yours,

George Freeman.

George Freeman MO



Norfolk Vanguard Offshore Wind Farm – Summary of representations from Norfolk councils, agencies, businesses and landowners

Background

This document has been compiled by the Necton Substation Action Group at the request of the office of George Freeman MP – to collate the representations made with regard to concerns about the proposals put forward by the applicant.

List

- 1) Breckland Council
- 2) Oulton Parish Council
- 3) Cawston Parish Council
- 4) East Ruston Parish Council
- 5) Happisburgh Parish Council
- 6) Holme Hale Parish Council
- 7) Little Dunham Parish Council
- 8) Necton Parish Council
- 9) Witton and Ridlington Parish Council
- 10) Fransham Parish Council
- 11) James Sheringham – Fransham Councillor and Local Farmer
- 12) Breckland District Council
- 13) North Norfolk District Council
- 14) Broadland District Council
- 15) Norfolk County Council
- 16) North Walsham Town Council
- 17) Reepham Ward – Cllr Graham Everett
- 18) Environment Agency
- 19) Campaign to Protect Rural England
- 20) Natural England
- 21) Highways England
- 22) Marine Management Organisation
- 23) National Federation of Fishermen
- 24) National Grid
- 25) National Trust
- 26) RSPB
- 27) Shell International

- 28) Royal Yachting Association
- 29) Trinity House
- 30) Wildlife Trust
- 31) Ministry of Defence
- 32) Government of France
- 33) Network Rail
- 34) National Farmers Union
- 35) Scottish Power Renewables
- 36) Whale and Dolphin Conversation
- 37) Maritime and Coastguard Agency
- 38) Eastern Inshore Fisheries and Conservation Authority
- 39) Health and Safety Executive
- 40) Historic England
- 41) Necton Substation Action Group
- 42) Cadent Gas Limited
- 43) Gary Holley
- 44) Paul King
- 45) Westbrooke Holidays
- 46) Leith Marar
- 47) Bidwells on behalf of Christopher S Wright
- 48) Bidwells on behalf of Sir Edwards Evans-Lombe
- 49) Brown & Co on behalf of Necton Farms Ltd
- 50) Brown & Co on behalf of Mr Robert Claboon
- 51) Brown & Co on behalf of Mr and Mrs G Kerry
- 52) Brown & Co on behalf of Angloflora Farms Ltd
- 53) Brown & Co on behalf of Stephen Peter Evan Garrett and Penelope Anne Yvonne Garrett
- 54) Savills UK Ltd on behalf of Mr and Mrs J Leeder
- 55) Chris Monk
- 56) Ray and Diane Pearce
- 57) Colin King and Diana Lockwood

Representations

1) Breckland Council

- It is the planning judgement of the Local Planning Authority that this case does not have the backing of the affected local community. A key reason is due to concerns over the cumulative and visual impacts that would arise from the scheme.
- It is considered that the proposed extension to the existing National Grid substation in Necton would appear as a disproportionate additional development in the countryside.
- Comparison must be made between the need for renewable energy and a disproportionate and dominant impact on the landscape.
- The local community must be consulted on what other site specific mitigation measures should be secured and spent locally via a Community Benefit Fund.

- The Local Planning Authority would reinforce its recommendation for the applicant to run a purposeful and meaningful Local Liaison Group in order to achieve this.
- Difficult to quantify the exact level of direct planning gain (regarding job prospects) this will mean for the population of Breckland, especially for the residents of Necton.
- On the ground it would be extremely difficult to screen a development of this huge scale.
- The cumulative landscape and visual effects of the development would create negative disbenefits in planning terms.
- Land coverage comparable with the core centre of Necton itself, with structures extending much further into the air, would be the outcome.
- This is a sensitive landscape and visual resource. During the winter months in particular the existing substation is easily visible from the A47 near Necton. This makes it a prominent location viewed by local communities and visitors to the area. The planting adjacent to the A47 does not provide complete screening and it is possible to clearly see the substation from a number of key viewpoints.

2) Oulton Parish Council

- Conflict of traffic movements between Orsted and Vattenfall.
- Not enough information on HGVs – streets too small to accommodate them.
- Orsted and Vattenfall have documented differing existing traffic numbers.
- Vattenfall PIC (Personal Injury Collison) data did not include B1149.
- Saltcarr Farm, directly alongside the proposed shared access route for both projects. This impact has not been assessed.

3) Cawston Parish Council

- Concerns with regards properties adjacent to the B1145.
- Mitigation, given the increase in HGV traffic, doesn't appear to be adequate.

4) East Ruston Parish Council

- Road closures, traffic management and arable land disturbances.

5) Happisburgh Parish Council

- The impact of the work on beach and cliffs.
- Road closures and temporary traffic lights including passage of HGVs through narrow lanes.
- impact on houses close to the cables (loss of value etc).
- Excessive lighting.
- Lack of compensation.

6) Holme Hale Parish Council

- The choice of site is inappropriate, and other more appropriate sites have not been given due consideration.
- The size of the structures involved (substations) in this application are disproportionate to the rural setting/location.
- Light pollution and noise pollution will have a severe detrimental effect on the rural landscape.
- Immense environmental damage will result from this process, and this will be ongoing for many years.

7) Little Dunham Parish Council

- This development (substations) represents an over expansion of the existing site.
- The large converter buildings will only be partially disguised and this is conceded by the applicants in their submission.

8) Necton Parish Council

- The small rural parish of Necton is not a suitable location for this massive industrial development (substations), which when completed will be the biggest of its kind in the world, and when viable alternatives exist.
- Insufficient information on the National Grid extensions.
- NCC informed Vattenfall of jet crash and radiation risk in substation area on 5 June 2018.
- Flood Risk.
- Doubt the noise constraints required by statute can be met with the three sub-stations: Dudgeon, Vanguard & Boreas.
- Building of earth bank to help mitigation refused by Vattenfall.
- Elevation of site.
- 5 holiday lets nearby ignored by developer.
- 140 acres plus of BMV will be lost from arable use when all infrastructure and landscaping is complete.
- Fire risk.
- Rare bats ignored.
- Terrorism.
- Alternative site suggestions/offers ignored.

9) Witton & Ridlington Parish Council

- Disruption, noise, disturbance to wildlife and general access throughout the process.

10) Fransham Parish Council

- The proposed sites for the two new substations are completely unsuitable
- Two new substations so far inland from Vattenfall's Wind Farm is unnecessary.
- Vattenfall's Public Consultation was flawed.
- The proposal will cause unrecoverable damage to the environment.

11) James Sheringham – Fransham Councillor and Local Farmer

As farmers we have been through this kind of build before with the much smaller Dudgeon project. Issues we know will happen again with Vattenfall are:

- Soil damage in the wide cable route areas.
- Land drains will have to be cut to lay cables, leading to flooding in and around the cable corridor.
- Cables heating up the soil, impacting on future crop production.
- Junction bays resulting in further loss of crop arable land.
- Cable corridor preventing access to fields and segregate certain areas.
- Years of unnecessary mental and financial suffering to farmers.
- Destruction of fully established trees and hedges.
- Forcing wildlife out of their habitats.

NOTE: More than 1 farmer a week died through suicide in 2018

<https://www.farminguk.com/News/More-than-one-agricultural-worker-in-UK-commits-suicide-a-week-figures-show-48613.html>

There are photos to accompany the points, so I will attach that document to the email.

12) Breckland District Council (NOTE this was in letter form and not a representation.

- Policy DC15 clarifies that the council will support commercial scale renewable energy developments unless the environmental impacts of allowing the proposal would outweigh the wider social, economic and environmental benefits derived from it.
- Significant implications for residents, businesses and visitors.
- Vattenfall's claims that the DC option is kinder, but not for the residents of Necton.
- Not possible to disguise the effect on the landscape for many years.
- Council formerly requested that Vattenfall form a Local Liaison Group.
- Difficulties with A47 junction.
- Policy DC15 requires the development to be acceptable in terms of highway safety.
- Increase in HGV movements.
- Concerns with noise, light pollution, flood risk, ecological and archaeological impacts.

13) North Norfolk District Council

- Phasing of the Project and Associated Construction Timetable(s).
- Method of bringing offshore cables onshore at Happisburgh.
- Working Corridor of onshore cable route.
- Use of Horizontal Directional Drilling onshore.
- Impact of construction traffic.
- Landscape & Biodiversity Mitigation.
- Community Benefits.

14) Broadland District Council

- The cumulative impacts of the two proposals need to be considered.
- The two cable corridors crossing at a point north of Reepham has the potential to increase the visual and environmental impacts of the proposal in the locality of this intersection.
- Removal of hedgerow.

15) Norfolk County Council

- Vattenfall should work with National Grid and UK Power Networks to consider options regarding the potential to feed electricity into the local transmission networks.
- Vattenfall should commit to providing appropriate compensation for businesses and communities adversely affected by the construction works.
- Vattenfall should provide appropriate compensation (i.e. disturbance payments) to those fishing businesses affected.
- It is felt that the applicant needs to find a different site for their main compound.
- Vattenfall need to satisfy Highways England with regard to the safety of their proposed access at Necton onto the A47(T).
- Vattenfall should work closely with Highways England and Norfolk County Council (Highway Authority) to ensure the proposed cable route does not fetter any future plans for the dualling of the A47(T).
- Public Rights of Way.
- The flood risk study area crosses a number of existing field drains, ditches and irrigation channels which may require consents for works to ensure that any flood risk is not adversely affected.
- The County Council would ask that maximum possible replanting / mitigation of hedgerows is undertaken after works are carried out in respect of the cable route and any other onshore development resulting in the potential removal of hedgerow.
- The County Council would ask that sufficient safeguards and mitigation measures are put in place where the offshore cable route makes landfall to the south of Happisburgh (as a planning requirement), in order to

ensure the onshore infrastructure does not exacerbate existing coastal erosion in the area.

16) North Walsham Town Council

- An interest in the route for the cable, how it is to be developed and access to storage sites for the laying of the cable.

17) Reepham Ward - Cllr. Graham Everett

- Has urged Applicant to use trenchless crossing (HDD technology) at 3 key road crossing points on the B1145. Refused.
- Trench crossings at 3 road crossing points, closing one lane at a time under traffic light management. Not acceptable.
- Unsafe and unacceptable to consider reducing B1145 road to a single lane
- 2 other cable crossings on the B1145, both on Cawston Road should have HDD trenchless crossings again on similar safety grounds.

18) Environment Agency

- Storage of spoil in flood plains.
- Flood risk.
- Water Quality and Ecology.
- Contamination.

19) Campaign to Protect Rural England

- Possible for a change to a HVAC system without a new application for development consent.
- Possible risk to health from plane crash site in Necton.

20) Natural England

Concerns – Not satisfied that project would not have an adverse effect on:

- Alde-Ore Estuary SPA
- Flamborough & Filey Coast SPA
- Greater Wash SPA
- Outer Thames Estuary SPA
- Haisborough Hammond and Winterton SAC
- Southern North Sea cSAC
- River Wensum SAC
- Paston Great Barn SAC
- Norfolk Valley Fens SAC
- The Broads SAC

Other Concerns:

- Offshore Ornithology.
- Seasonal definitions.
- Seasonal Apportioning of impacts for Habitats Regulations Assessment.
- Assessment of displacement impacts.
- Collision Risk Modelling.
- Cumulative and In-combination assessments.
- Population Modelling Approaches.

NOTE: Natural England's concerns would fill the whole page

21) Highways England

- The agreement of acceptable access arrangements for the works associated with the sub-station at Necton.
- The agreement of acceptable access arrangements for the A47 cable crossing at Scarning.
- The impact on the A47 junctions at Swaffham and Dereham of traffic displaced from these locations, should it be necessary to restrict any of the site accesses to left-in, left-out movements only.
- Full compliance with relevant DMRB design standards for the layouts proposed at access option locations A, B and D1.
- Confirmation that the swept paths of heavy goods vehicles can be accommodated without over running of kerb or centre lines.
- Interference with A47 and other road improvement creating dangerous situations.

22) Marine Management Organisation

- No worst case summary for the whole project has been provided as was requested by the SoS.
- J tube and ladder cleaning – more info needed.
- Cable failures per year.
- No summary of engagement with MMO provided.
- Feedback not addressed.
- Marine Licence required for unexploded ordnance.
- Hammer energy.
- Mitigation concerns.
- Underwater noise concerns.
- Some Proposals may be contrary to the intention of Parliament set out in the Marine and Coastal Access Act 2009 and would potentially usurp the role of the MMO as a regulator.
- It remains unclear to the MMO, why Vanguard would like to apply arbitration to 'differences' which may arise post-consent between itself and either the Secretary of State or the MMO.

NOTE: Many more examples or proper procedures not having been applied by Vattenfall. Disregard shown by Vattenfall to MMO.

23) National Federation of Fishermen

- Worst case scenario not adequately defined.
- Risk to fishing vessels.
- Sensitivity Criteria relating to range and number of fishing grounds.
- Cumulative Effects assessment lacking.
- Floating wind turbines worse.
- Exposed cables.

24) National Grid

- Objection to Connection to Electricity Transmission Network in close proximity to extensive apparatus.
- Objection to some Compulsory Acquisition Powers.
- Concerns that Gas transmission lines may be at risk from works.
- Property rights - complicated issue.

25) National Trust

- Objection to compulsory purchase of its land.
- The impact of the proposals on the little understood archaeology of the Estate.
- The impact of disturbance to the highways network and the consequent effect on our visitor based business.
- Closure of or restricting access along the road between Blickling and Aylsham should be avoided as it would likely lead to the loss of business for the Trust. Where disruption would be unavoidable, any potential visitor income loss should be underwritten by the developer.

26) RSPB

- The impact of collision mortality on the kittiwake population of the Flamborough and Filey Coast SPA alone and in-combination with other plans and projects.
- The impact of collision mortality on the gannet population of the Flamborough and Filey Coast SPA alone and in-combination with other plans and projects.
- The impact of collision mortality on the lesser black-backed gull population of the Alde-Ore Estuary SPA alone and in-combination with other projects.
- Cumulative collision mortality to North Sea populations of kittiwake and great black-backed gull.
- Cumulative operational displacement to North Sea populations of red-throated diver, guillemot and razorbill.
- Use of Potential Biological Removal in assessment of impacts on SPA populations.

- Use of an unverified stochastic Collision Risk Model (CRM) which underestimates collision mortality.
- Use of median bird densities within the deterministic CRM.
- Use of revised Nocturnal Activity Rates.
- Use of migration-free breeding season.
- Approach to apportioning of mortality to SPAs for kittiwake and lesser black-backed gull.
- Breeding season gannet avoidance rate of 98.9%.
- Inclusion of unjustified criticisms of kittiwake tracking data.
- Proposal for mitigation of impacts on the Alde-Ore Estuary SPA.

27) Shell International

- Before any work (including hand trial holes) starts in the vicinity, a BPA technician must locate and mark the pipeline on site.
- The developer may not start works within 6m of the pipeline without the BPAs prior written approval and entry into a crossing agreement. The BPA may require (without limitation) that the developer supplies a detailed description of the proposed works, a plan of the work area, drawings and a method statement.
- A BPA technician must supervise all works within 6m of the pipeline. The technician will determine whether a written method statement is necessary before any works proceed. The BPA require a minimum of 7 days' notice to arrange supervision (under normal circumstances).
- Heavy vehicle crossing points to be approved before use across the easement.
- Any works involving the exposure of the pipeline requires a continuous site presence until backfilled (this may mean a security arrangement out of hours).
- The BPA may require proof of liability insurance depending on the proposed works.

28) Royal Yachting Association

- Opposes the declaration operational safety zones as a convenient expedient to remove the risk from the wind farm operator without the need to implement a monitoring and safety management system.
- If the operators want an operational safety zone then the operator must produce a compelling case which includes the monitoring and safety management of such a zone for the purpose of reducing risk to an acceptable level. Without this, an operational safety zone will be unenforceable, ineffective and thus poor regulation.

29) Trinity House

- Arbitration may affect Trinity House's ability to carry out its statutory functions.

30) Wildlife Trust

- TWT does not consider SIP adequate to ensure no adverse effect on the SNS SCI beyond reasonable scientific doubt.

31) Ministry of Defence

- The proposed wind farm will be in line of sight and detectable to the air defence radar located at RAF Trimmingham.
- Turbine proliferation within a specific locality can result in unacceptable degradation of the radar's operational integrity. This would reduce the RAF's ability to detect and manage aircraft in United Kingdom sovereign airspace, thereby preventing it from effectively performing its primary function of Air Defence of the United Kingdom.

32) Government of France

- Collision risks to several bird species.
- Common and little terns, lesser black-backed, great black-backed, common, and Mediterranean gulls, which nest on the SPA "Banc des Flandres" or use the site during the breeding season.
- Black-legged kittiwake, northern fulmar and herring gull on SPA "Caps Gris Nez"
- The cumulative risk of barrier effect of wind farms was not assessed.

33) Network Rail

In order for Network Rail to be in a position to withdraw its objection Network Rail requires agreements with the Applicant that regulate:

- The manner in which rights over railway property are carried out including terms which protect Network Rail's statutory undertaking and agreement that compulsory acquisition powers will not be exercised in relation to such land; and - the carrying out of works in the vicinity of the operational railway network to safeguard Network Rail's statutory undertaking.
- To safeguard Network Rail's interests and the safety and integrity of the operational railway, Network Rail objects to the inclusion of the Compulsory Powers and any other powers affecting Network Rail in the Order.

34) National Farmers Union

Concerns over:

- Consultation and Engagement.
- Soil Management during construction.
- At the present time the plans are showing for the new converter substation to be located at the top of a hill on a very prominent site near to Necton Wood. Further to a site visit on 10th September 2018 to look at the proposed elevated site, information has been requested on why such a prominent site position has been chosen as it will be visible particularly from the south and west.
- Screening provided by land form and existing features should be taken advantage of and this is not the case with the proposed site.
- Timings of construction.
- Land drainage.
- Insufficient detail on land reinstatement.
- Dust/irrigation.
- Insufficient detail on access to land during construction.

35) Scottish Power Renewables

- Cumulative and incombination issues.

36) Whale and Dolphin Conservation

- Norfolk Vanguard offshore wind farm has the potential to negatively impact cetaceans, in particular harbour porpoises and the integrity of the Southern North Sea SCI, for which harbour porpoise (*Phocoena phocoena*) are the qualifying feature.

Conditions:

- That pile driving is not used at all during construction.
- That strict limits be placed on noise levels during construction, including cumulative noise.
- That proven mitigation methods are in place around the source to mitigate the impacts of radiated noise levels.
- That a robust impact monitoring strategy (Marine Mammal Monitoring Plan (MMMP)) is developed for the range of species that can reasonably be expected to be impacted.
- That WDC is included as a consultee of the MMMP and that we are included in the discussions for the design of the MMMP as we have concerns regarding effectiveness of some mitigation methods.
- A robust MMMP should include: shut-down when marine mammals approach within a specified distance of operations (mitigation zone).

- That the monitoring strategy is appropriate to consider cumulative impacts of all developments in the region.
- Ground-truthing of modelled noise assessment data should be undertaken.
- Should any incident that results in mortality occur during construction, activities should be halted immediately until an investigation can be completed.
- An assessment report is publicly available within a reasonable timeframe of construction completion.

37) Maritime & Coastguard Agency

- The turbine layout design will require MCA approval prior to construction to minimise the risks to surface vessels, including rescue boats, and search and rescue aircraft operating within the site. As such, MCA will seek to ensure all structures are aligned in straight rows and columns with a minimum of two lines of orientation.
- We are concerned about the scale of the development in combination with multiple windfarms in the Southern North Sea.
- It is noted that floating wind turbines are being considered. Further details are required on the anchor and line spread, monitoring during construction and operation, recovery of turbines and Third Party Verification.
- The applicants are reminded that the final data supplied as a digital full density data set, and the report of survey, should be submitted to the MCA Hydrography Manager and the UK Hydrographic Office. This information is yet to be submitted and failure to report the survey or conduct it to Order 1a might invalidate the NRA if it was deemed not fit for purpose.
- Any consented cable protection works must ensure existing and future safe navigation is not compromised.

38) Eastern Inshore Fisheries and Conservation Authority

- Cable protection works in Haisborough, Hammond and Winterton SCI are extremely undesirable, and are not in keeping with the East Marine Plans.
- Temporary habitat loss, the remobilisation of sediment and disturbance is likely to result from each set of cable works, reburials and repairs.
- Behavioural sensitivity of sandeels (important prey for Harbour Porpoises) to underwater noise from piling and medium sensitivity of sandeels to permanent loss of seabed habitat during operation.
- The impacts of these projects on the marine environment and fisheries should be assessed in-combination, highlighting any potential cumulative effects associated with the licence

application... it is the collective responsibility of all projects to comprehensively assess the cumulative impacts, under the guidance of the Regulators.

- There are appreciable gaps in the scientific literature as to the potential effects of EMF emissions from subsea cables on marine fauna, and therefore there remain uncertainties in the ability of Vatenfall to determine that there will be no adverse effects on fish and shellfish ecology. Eastern IFCA is particularly concerned about the proliferation of marine electricity cables off the East Anglian coast and the potential – but very poorly understood – impacts on marine life.
- Eastern IFCA would like to refer you to the recently published Marine Pollution Bulletin paper by Scott et al. (2018) on the effects of EMF on edible crab, *Cancer pagarus*. The impact of EMF on crustaceans is another issue worth considering due to the commercial and ecological importance of the edible crab and European lobster, *Homarus gammarus*, and the recent advance in scientific research on this subject.

39) Health & Safety Executive

- The table below illustrates the major hazard sites and pipelines which may be affected by the onshore elements of the Norfolk Vanguard offshore wind farm. The actual sites and pipelines will depend on the final route of the export cables.
HSE Ref. Site/Pipeline Operator Operator Ref. Site/Pipeline Name
Pipelines
7446 National Grid Gas 1705 5 Feeder Bacton to Yelverton
7450 National Grid Gas 1709 Bacton to Roudham Heath
8371 National Grid Gas 2648 Bacton to Kings Lynn Comp.
12238 National Grid Gas 2739 27 Feeder Bacton to Kings Lynn
7409 National Grid Gas 1668 East Dereham to Wells
8377 National Grid Gas 2654 Brisley to Bushey Common
7413 National Grid Gas 1672 Bushey Common to Saham Grove
7414 National Grid Gas 1673 Saham Grove to Swaffham

40) Historic England

- We have previously raised concerns in relation to the impact of the substation on the significance of a number of designated heritage assets through development within their setting. We are pleased that a specific historic environment visualisations chapter has been produced (see ES Vol. 1 Chapter 29) to work alongside the Historic Environment Chapter of the ES. Using this additional material we confirm that there are limited views of these assets, however we will explore this issue further in our written representation.

41) Necton Substation Action Group

- Vattenfall's environmental damage has been admitted now in the Errata to be worse than was published during the consultation. This means people did not have enough facts to make reasoned environmental comments/objections during the consultation, which should therefore be done again with the errata in it.
- Top Farm, Necton, was offered for sale to Vattenfall. Top Farm being used for both substations (and even possibly National Grid extensions) would mean there would be no circular route all the way around the Dudgeon site, and no ruining of Dudgeon's landscaping, some of which was planted in 2014.
- Other environmental advantages in using Top Farm are: Less incoming cabling to substations and thence to National Grid from Top Farm. Only 1 farm severed and blighted instead of 3. (Currently both Top Farm – with access road, and Necton Farm with substations and cables would be severed and blighted.) And Ivy Todd Farm would be blighted for any future resale, or any diversification changes to its current use (with no compensation whatsoever).
- Even the latest documents show that Vattenfall have still not obtained all the available documents relating to the 1996 F16 crash in Necton.

42) Cadent Gas Limited

- CPOs might affect their apparatus or their access to it.
- 56 days advance notice is not a long period to consider safety grounds.
- Order not to be transferred to a party with insufficient financial standing to meet the Applicant's obligations towards Cadent Gas under the Order.

Insufficient property rights have the following safety implications:

- Inability for qualified personnel to access apparatus for its maintenance, repair and inspection.
- Risk of strike to pipeline if development occurs within the easement zone which seeks to protect the pipeline from development.
- Risk of inappropriate development within the vicinity of the pipeline increasing the risk of the above.

Holiday Let Businesses – Vattenfall have claimed there are NO holiday let businesses in Necton

43) Gary Holley

- I have a 4 star Holiday let (Necton) with swimming pool which has been successfully run over 18 years, and earlier this year we received planning permission for four more Lodges, making it a small Holiday Park.
- Effectively this development will destroy this business.
- It is situated on high ground, visible on the A47 as you enter and leave Norfolk, which is the third most popular Holiday destination in the UK.
- You only need one review in this day and age to say, "location spoilt by massive substation opposite", and that is game over.
- I offered a much better location at Top Farm Fransham, with the Farmer interested in selling.
- Vattenfall have never visited our home or holiday development to discuss or meet.

44) Paul King

- On my land (Necton) I run a 5 van caravan and motorhome club site.
- My father tile drained this land where the proposed substation is to be built. I have personally worked this land and know it will not hold water having been tile drained every 22 yards.
- I am concerned the substation will have a negative effect on business. People will prefer not to holiday near a substation but choose a site elsewhere.

45) Westbrooke Holidays – Self Catering Holiday Cottages – West End – Necton area

- Our holiday let business thrives on repeat business from star-gazers. Light pollution from the site could damage our reputation forever.
- Vattenfall are coming back every summer to do 24/7 maintenance for up to 2 months!
- Google maps will show the new substations (as they show Dudgeon now) and this will be very off-putting for holiday-makers as Vanguard and Boreas will be much closer to us than Dudgeon is.

46) Leith Marar – Happisburgh Holiday let.

- A 10,000 square meter (100m X 100m) construction site will be located at the rear of our property possibly adjacent to it.
- Trench works will come to the surface with onward trenching in the fields at the southern boundary of our property.

- At the end of the construction period estimated to be 2025 the site will be simply abandoned and simply permanently fenced to protect a very large hole in the ground never to be filled in. This will obviously make renting our home on the basis that we currently do untenable.
- Larger traffic vehicles passing now can cause vibrations in the property. Hence if earth moving trucks are to be passing the property on this very small road frequently we fear permanent damage to our house.

47) Bidwells on behalf of Christopher S Wright

- That the cable depth be increased to 1.75 metres on health and safety grounds.
- That the route of the cable easement across my property be diverted/re-routed southwards to minimise the disturbance, noise and dust which would greatly affect the Elm Farm house and buildings where I live and the adjoining residents.
- The proposed access routes to the easement strip are unacceptable as they infringe on the privacy and enjoyment of my property. Alternatives have been suggested.

48) Bidwells on behalf of Sir Edward Evans-Lombe

- As presently planned, the Orsted cable line will run about 55kms to the Swardeston National Grid receiving station and The Vattenfall Line will run about 60km to the Necton receiving station. These lines will actually cross each other at Salle. Vattenfall have 'booked' their Necton destination with the National Grid.
These arrangements appear to run contrary to common sense because Orsted's landing point is much closer to Necton than Vattenfall's and Vattenfall's landing point is much closer to Swardeston than Orsted's.
- If Orsted and Vattenfall swapped destinations, 22kms of cable would be saved. If both lines came ashore close to each other east of Cromer and then ran together to the closest National Grid receiving station, possibly Swardeston, or a new receiving station at or near North Walsham, up to 80km of cable line would be saved.
- These savings of line would lead to substantial savings of installation cost and public amenity. If the "East of Cromer Solution" was adopted, these savings would be massive. Further, it appears it might be possible for Orsted to connect with The National Grid at Walpole to the west of Kings Lynn where loss of amenity would be minimal.

- The making of a Development Consent Order as proposed should be made conditional on Vattenfall agreeing to give up its “booking” of Necton, thus making it available to Orsted. The Applicants should be required to investigate the East of Cromer Solution and the Walpole Solution and report to the Planning Authority.

49) Brown & Co on behalf of Necton Farms Ltd

- Necton Farms Ltd own 89 acres of agricultural land which has been identified as the site of the on-shore substations, to include the Vanguard and Boreas substations and the National Grid connection sites. A small proportion of the proposed substations is positioned outside of Necton Farms’ ownership.
- The proposed substations will have an effect on the holding and Necton Farms’ business, both by way of land lost to the scheme, but substantially, too, by way of Injurious Affection to the retained farm.
- Impact on Necton Farms’ farming business during construction; disruption to accessibility of the farm, irregular field shapes, circa 50 acres taken out of production for up to 5 years’ work to pylons.
- Impact on the farm business due to decrease in farm size.
- Devaluation, in monetary terms, of the retained farm; which entails loss of amenity value of the farm, and decreased agricultural value due to the effects on the layout of the farm, changes in field shapes, accessibility of the farm.

50) Brown & Co on behalf of Mr Robert Claboon

- Concerns relating to the potential sterilization of land with potential to be developed for housing and or employment/commercial use. The planning situation in North Norfolk remains highly fluid and under review.
- The timing of this infrastructure project may result in competing development interests being sterilized due to being at an earlier stage of the development consent process.

51) Brown & Co on behalf of Mr and Mrs G Kerry

- Mr and Mrs G Kerry own a smallholding predominantly comprising a large parcel of agricultural land extending to approximately 94 acres. This field has been identified as part of the Vattenfall cable route.
- The proposed cable route will have an effect on the holding and Mr and Mrs Kerry’s farming business certainly in the short term and potentially in the longer term if the concerns of the Kerrys are not dealt with appropriately.

- The proposed route intersects the principal field forming the smallholding and therefore the impact of severance to a high proportion of the farmland is significant.
- The impact on the Kerry's farming business and residential occupation of the farm during construction phase.
- Crop loss and other associated losses including damage to underdrainage systems.
- Concerns over soil stripping, storage and subsequent reinstatement particularly in light of previous issues surrounding damage caused by Anglian Water on the same site.
- Destruction of soil structure and remedial cultivations.
- Ecological disturbance.
- Land sterilisation and potential for cross contamination
- Protection of features subject to statutory or non-statutory designations.
- Effect on the local community.
- Access during and after works by contractors and operators causing interference and disturbance.
- Potential interference with underground telephone line, Anglian Water infrastructure and any other service media.

52) Brown & Co on behalf of Angloflora Farms Ltd.

- Angloflora Farms Ltd. have approximately 65 acres of agricultural land forming four parcels which are identified as being affected by the Vattenfall cable route.
- The proposed cable route will have an effect on the holding and the farming business certainly in the short term and potentially in the longer term if the concerns of Angloflora Farms Ltd. are not dealt with appropriately.
- The proposed route and associated access affects four land parcels, either directly as the working area of the cable route or by provision of access.
- Severance to productive arable land during construction.
- The impact on the farming business and residential occupation of the farm during construction phase.
- Crop loss and other associated losses including damage to underdrainage systems.
- Concerns over soil stripping, storage and subsequent reinstatement.
- Destruction of soil structure and remedial cultivations.
- Ecological disturbance.
- Land sterilisation and potential for cross contamination.
- Protection of features subject to statutory or non-statutory designations.
- Effect on the local community.

- Access during and after works by contractors and operators causing interference and disturbance.
- Potential interference with existing drainage for which plans are not available and any other service media.

53) Brown & Co on behalf of Stephen Peter Evan Garrett and Penelope Anne Yvonne Garrett

- One of the proposed routes of the cable immediately adjacent to Wood Farm presents severe implications, and is in contradiction of publicised policy for defining the route, the key policy principles being.
- 1. 'INSTALL CABLES WITHIN OPEN AGRICULTURAL LAND WHERE POSSIBLE'.
There are many options for routing the cable through open agricultural land, away from residential property. Prior to 27th April 2018, Vattenfall were undertaking public consultation on a route across open agricultural land to the south.
- 2. 'AVOID RENDERING PARCELS OF AGRICULTURAL LAND INACCESSIBLE DURING CONSTRUCTION'
During laying of the cable, along the entire project length, there are many instances where fields are crossed by the cable. As a result, Vattenfall are employing mitigation works so that farmers can access all of their land and continue to farm after the scheme. Such mitigation works and compensatory provisions can be made to farmers, in a simple manner, and there is no reason why this can't be applied to the southern option, rather than passing Wood Farm.
- 3. AVOID AREAS OF IMPORTANT HABITAT, TREES, PONDS AND AGRICULTURAL DITCHES
Upon the boundary of Wood Farm, and within very close proximity either side, there are conifer trees, mature trees, mature hedging, a ditch, ancient oak trees, ancient orchard, all with established habitats. During the construction works and following the scheme, these ecological features will be destroyed. NB Vattenfall environmental surveyors have not visited the site to assess these valuable habitats, or prepared reports at the time of DCO submission.
- 4. MINIMISE IMPACTS ON AGRICULTURAL PRACTICES AND ACCESS
By simply applying mitigation works and compensation, there will be no impacts on agricultural practices or shooting if the route crosses open land to the south.
- 5. REDUCE PROXIMITY TO RESIDENTIAL DWELLINGS
The 'key principle' of avoiding residential property would not be met if the cable is positioned next to Wood Farm.

- The property is served by a water borehole and septic tank; operation, contamination changes to the water table are concerns.
- The property is clay lump construction, without foundations. Vibrations, soil swell, and other ground disturbance caused by the engineering works, could result in weakness in the construction of the house, in years to come, affecting property value.
- The only access to the property is via Googles Lane running to a private track along which Mr and Mrs Garrett have a legal right to and from Wood Farm, and under which the proposed cable will run. During construction (not only the width of the cable, but also by consequence of the cable route along this longer section being used as a 'runway'), access will be prevented.
- It is critical that access is not interrupted, in any way, for business, domestic and emergency purposes; business purposes, for the training and breeding of dogs. The works will severely unsettle the dogs, particularly during pregnancy.
- 6. MINIMISE IMPACTS TO LOCAL RESIDENTS IN RELATION TO ACCESS TO SERVICES AND ROAD USAGE, INCLUDING FOOTPATH CLOSURES
Access issues pertaining to Wood Farm House as above, apply under this 'key principle'.

54) Savills UK Ltd on behalf of Mr and Mrs J Leeder

- Our client is a long standing successful local business specialising in outdoor pig breeding and employing local people.
- The proposed scheme severely impacts on the business.
- It will be necessary to relocate the 900 sows plus accompanying piglets and replacement stock whilst the scheme is under construction.
- Relocation will be a major operation and finding alternative suitable land within the area will not be easy.
- At this point in time Vattenfall are unable to give a clear indication of the construction timetable which makes it very difficult to plan for the future of the business.

NOTE: Land Agents represent many other farmers, but the others are simply using the NFU points and objections.

55) Chris Monk

- We live in the centre of Cawston and our house fronts onto the B1145, very close to the traffic. The impact of this scheme, together with the Vattenfall Norfolk Boreas scheme and Orsted's Hornsea 3, will be devastating to our quality of life and enjoyment of our property.

- In principle we are strongly in favour of schemes such as renewable energy which serve to protect and improve the environment, but we do feel that the philosophy of protecting the wider environment should not rest on destroying some local environments, which is what will happen if this proposal goes ahead in its current form.
- We do not feel that alternative approaches, and routes avoiding Cawston have been properly assessed. The B1145 and other roads in this area are simply unsuitable for the types and volumes of traffic proposed.
- The levels of noise and vibration in the centre of the village will be intolerable and there are real road safety concerns.
- Several of these houses date from the 18th Century, some are subject to Preservation Orders, and there has to be a likelihood of major structural damage.
- There is a village junior school, buses, school buses collecting senior pupils, and a busy centre with shops, pub and houses close to the narrow road - a constant need for pedestrians to be able to cross the road throughout the day.
- There are several blind junctions, where traffic on the side road has to creep into the main road to see what is coming. The old railway bridge near the village hall is also on a blind bend with no pavement for pedestrians.
- We get no sense that factors like these have been considered sufficiently in the proposal. We note that Vattenfall suggest that some mitigation can be achieved by driver training; this is absurd. Surely drivers should be properly trained in any event, and in fact a failure to adhere to high standards would be an exacerbation.

56) Ray and Diane Pearce

- Our property (Reference 2), is in a unique position with regards to the project as it is situated within 80m of the proposed cable route and, more importantly, adjacent to the position where the Hornsea Project Three cables cross the Norfolk Vanguard and Boreas cables. Unfortunately, our property was not included for assessment within the PEIR process. Necton Connection Point –
- The PEIR does not sufficiently explain why the connection points at Walpole and Norwich Main (Swardeston) were disregarded and the Public has been presented with a “fait accompli” regarding the allocated connection point, being at Necton. The later allocation of Norwich Main to the Hornsea Project Three is causal in the cables having to cross other projects’ cables, also in consultation, namely those of Ørsted’s Hornsea Three Project. We hereby contest, through the Planning Inspectorate, that the allocation of connection points under a historic licence, made by NG plc, are neither co-ordinated nor adequate for the future development of

off-shore wind farms. We consider that: either, a national co-ordinating body separate to the 'for profits' company currently responsible for NETS connections is established, or, the current licence issued to National Grid plc is urgently reviewed to reflect the current UK National requirements for renewable energy, especially when considering the consequential increase in NETS connection applications. We regard the allocation process as a "first come, first served" lottery which is not in the Public's interest nor the environment as a whole.

- Walpole is only 6 miles from the coast with the on-shore requirement crossing primarily uninhabited, reclaimed arable land. We have been informed by the Vanguard Project Team that the Walpole connection was discounted purely on the cost for the increased cable length; a fact reiterated by Vattenfall representatives at a Public meeting organised by the MP for North Norfolk (Norman Lamb). However, the alternative of utilising primarily marine cables, on a like for like cost comparison with the proposed 60km off on-shore cables, was not discussed, nor was the effect on the marine versus terrestrial environment compared.
- The cumulative effects of the location of construction compounds on private residents and members of the Norfolk public has not been adequately considered. Both Ørsted and Vattenfall are planning their own compounds, additional roads and access points without any regard for each other or a co-ordinated plan.
- Vattenfall have still to specifically address the environmental issues and local heating effects of the crossing point. We contest that they cannot do so as the final design of whether the Hornsea Three cables pass over or under the Vanguard / Boreas cables has yet to be decided.
- The other issue being the selection of either HVDC or HVAC for the Hornsea Three transmission system which we accept is beyond Vanguard's influence. Neither the inter-relationships, nor cumulative impacts of the cable crossing point for each option - HVDC v HVDC or HVDC v HVAC, above or below Vanguard's cables - have been included in the consultation to date and are a glaring omission.

57) Colin King and Diana Lockwood - Closest Receptors to Vanguard and Boreas Substations

- Necton has been selected without due and serious consideration as to the negative impact the substations will cause. (Other locations which would cause less impact on individuals' lives have been identified and submitted to VF but do not appear to have been explored, or valid reasons given as to why they have not been considered or ruled out.)

- We have received insulting treatment from VF, when asking for information and explanations. We have been ignored, referred to generic information which is non specific and non helpful to our village and unique concerns, given ambiguous and non specific answers. We have to fight for information which has caused us to feel serious distrust and genuine worry as to the integrity of VF. Technology and progress are wonderful and at times miraculous. I fear though that in the hands of VF neither are safe or being used appropriately or with integrity and transparency.
- No amount of mitigation will disguise this monstrous construction from my family farm.
- The intention to discharge substation runoff and drainage water into the River Wissey tributary, that runs through Ivy Todd. The intended site's land has very little natural drainage as the soil is predominantly clay, and to farm the land, it has all required under draining, which runs into the said stream. We have lived next to the stream for 48 years, and it is common knowledge that it floods. It floods Watery Lane, the Lodge Road regularly, and occasionally one of our fields, and in the early 1980s it flooded our house and buildings, and three other properties.
- The engineered mitigation for this is to construct water storage lagoons and discharge into the stream when stream levels are low. As the stream's capacity is critical already, this puts added importance and pressure on the system, which cannot malfunction. I have sent a CD and DVD of the stream running past our house, by post, to show the stream level with 30mm of rain in 20 hours. This was from an initially moderate low level, and shows how quickly the level rises.(I have known the stream to rise higher than shown in the pictures, and flood all Watery Lane, and our outdoor pigs. with a heavy summer storm over the A47 road and the proposed substation site, without a drop of rain in Ivy Todd.) The system must be foolproof, and well maintained. There needs to be information on how this issue will be managed when the project is decommissioned.
- The operating sound situation is unclear to me, with different db levels mentioned for different frequencies, and the distance from the compound that these levels are expected. Then the cumulative effect with Dudgeon, and the A47 road, and the weather conditions for the 24hour background noise monitoring. I have no idea what to expect, and what we are supposed to live with. It has been mentioned that it is acceptable to hear noise in our farm yard, and on our land 400m away from the site, as long as it is inaudible at the house. I could almost agree with this, if the land and yard was far from the house and remote, but as it all joins, and extends from the farm house, it would blight my working day, (every day) and the value of the whole property.

- I have a dread of disturbing the F16 plane crash site. We lived through the incident. It was on course for our farm, but very fortunately it grounded a few hundred meters before. Never the less, our farm was showered with burning debris, like little candles.

NOTE: There are photos of flooding attached on the original PDF file.

NECTON SUBSTATION ACTION GROUP

PETITION AGAINST TWO NEW SUBSTATIONS (VANGUARD & BOREAS)
INTENDED TO BE BUILT IN NECTON/IVY TODD BY VATTENFALL
INCLUDING TWO ASSOCIATED NATIONAL GRID EXTENSIONS

To Date: 8th June 2018

Total Individual signatures in Necton: 768

Total Household signatures in Necton: 561

Total Signatures in Norfolk: 980

Total Signatures in UK: 1044

NOTE: Signatures have been carefully checked and anyone who signed twice has only been counted once.

Contact us: nectonsubstationaction@outlook.com