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If we may we would like to make comments on some of Vattenfall's responses where they for some reason persist in giving comments from the Scottish Guidelines for community benefits regarding wind farms. We are very puzzled as to why they quote the Scottish Guidelines when this proposed project is in England. Indeed when asked why they do this, they have stated that there are no English Guidelines. But there are, (perhaps the developer was unable to find them?) and we quote some below, with our comments to them in bold italics.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/363405/FINAL\\_-\\_Community\\_Benefits\\_Guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/363405/FINAL_-_Community_Benefits_Guidance.pdf)

"All parties should consider and communicate how they can contribute to the process of providing community benefits in a timely fashion. Developers should state their approach to community benefits at the point that details of the proposed development are made public, to allow the community time to consider how and when they wish to engage in negotiations."

***Vattenfall have been incredibly secretive about any community benefits, saying such things as 'they won't be discussed until after planning consent'.***

"Unconditional The offer of community benefits should not be dependent upon support from the community for the wind development, or the granting of consent by the local planning authority. Contributing to community benefit discussions must not affect an individual or organisation's right to express a view on the development proposals. Objecting to, or supporting, the development should not affect an individual's/group's/organisation's right to discuss community benefit proposals."

***Again, Vattenfall have told us they will not discuss them until after the planning consent. Indeed when asked to attend a liaison group set up by George Freeman MP along the lines of that requested of the developer by Breckland, they refused to attend, giving very short notice for doing so and quoting Scottish Guidelines as a reason. They did not attend any of the rest of the monthly meetings held.***

"The identification of appropriate community benefits should grow out of discussions between the community and the developer and should be relative to the nature and scale of the proposed development. The earlier these conversations begin, the greater the opportunity for locally appropriate benefits to be identified and delivered effectively. If developers and communities take a constructive approach to community benefits and begin effective dialogue early in the process, when outcomes can be influenced, effective solutions can normally be reached."

***On many occasions Vattenfall have been advised (including by Breckland) that this development being the largest onshore ((for offshore) substation in the world, and yet they have ignored all attempts to discover what amazing scale of compensation they will be giving Necton. The only mention of benefits so far have been regarding job prospects, which are irrelevant to Necton.***

"ensuring all community participants are aware that engagement in the process does not affect their right to have a view on the specific development through the planning process".

***This surely means that both community benefits and planning process should go on at the same time, and that VF were entirely wrong to refuse to attend meetings with us were both things were planned to be discussed under different agenda points.***

"Best practice for developers in identifying which community benefits might be locally appropriate is: stating, at the time that details of their proposed development are made public, their approach to community benefits and offering to discuss the scope of the opportunity with the local authority and community."

***Their approach to community benefits has not be revealed, except for them to state angrily that they do not have to give us anything. This appears to be a reaction to our opposition to their plans, which again goes against English Guidelines where it states "Contributing to community benefit discussions must not affect an individual or organisation's right to express a view on the development proposals. Objecting to, or supporting, the development should not affect an individual's/group's/organisation's right to discuss community benefit proposals."***

"However, best practice here is considered to be the developer obtaining an in-depth understanding of the community or communities who are hosting the wind farm, how they interact with each other, how the wider geography impacts upon the area, and proposing a solution that suits these circumstances."

***Vattenfall have no understanding of this community, let alone an in depth one. To have that they would have to have meaningful conversations with the community, instead of merely giving out information and asking very***

***open questions clearly biased towards themselves, such as 'Are you in favour of offshore wind? Yes/No. People in Necton are not against offshore wind, just the strategy of placing it, and the expectation that Necton should accept the industrialisation of its rural location.'***

“...listening to and respecting the views of the community. If the local community does not wish to engage in discussions until after planning consent has been granted then this position should be respected, if that is representative of the local community. The door should always be left open for the community to reengage at any point.”

***Respect has never been an emotion detected in any presentations from this developer. They do not seem to currently be respecting our Parish Council or the advice in the above statement at all.***

“...ensuring it is well known across the local area that the offer of community benefits has been made. An engagement plan should be produced by the developer based on an understanding of the local area, prior to a planning application being submitted.”

***No offer of community benefit has been received by the residents of Necton, and we are now in the middle of the DCO examination, let alone before the planning application was submitted.***

“...ensuring it is well known across the local community that the offer of community benefits has been made by a developer. Provide support, advice and encouragement to local people to engage in the process. encourage community benefit discussions to be held in an open forum and a record of who is involved kept and shared.”

***Again, no. There have been no open forum discussions of any aspect of this project. At the only interactive forum that was attempted – it was to an invited group of the population only, and no verbal discussion was actually allowed whatsoever.***

“The focus of engagement in the preparation stage is to establish the broad parameters of any proposed community benefits package to ensure that people are aware of the opportunity and have time to collect their thoughts and respond constructively. It is recommended that the issue of community benefit is consulted upon early, prior to a planning application being submitted. Some communities may not wish to talk about community benefits at this stage, but it is important that the community is given the opportunity and the time to decide how to respond.”

***This did not happen. Now that we are in the middle of the examination, it is far too late for Vattenfall to comply with this. Perhaps to avoid complying with this is the reason they have chosen to use the Scottish Guidelines?***

***Thank you. Please publish this on the project page.***

***Necton Substation Action Group***