

From: nectonparishcouncil@gmail.com
To: [Norfolk Vanguard](#)
Cc: [REDACTED]
Subject: Submission from Necton Parish Council
Date: 13 March 2019 18:45:45
Attachments: [Necton PC 2nd Response to PINS Questions 2019.docx](#)

Please see attached

Regards

James

James Howard BSc

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NECTON PARISH COUNCIL RESPONSE TO PINS SECOND QUESTIONS Deadline: March 13th 2019

URN: 13.21 *The extension to the existing Necton National Grid substation has not been included as part of the noise modelling presented in ES chapter 25. Do you agree with this approach?*

Necton Parish Council do not agree that any part of the operational infrastructure can be omitted from the noise modelling. The result of the noise modelling cannot be accepted as accurate if any part of the infrastructure is not included.

URN: 14.34 *NPS EN-3 makes clear that among other things consent for a development should not be refused solely on the ground of an adverse effect on visual amenity unless an alternative layout within the identified site could be reasonably proposed which would minimise any harm, taking into account other constraints that the Applicant has faced such as ecological effects, while maintaining safety or economic viability of the application.*

Please clarify what alternative layout within the identified site, as opposed to land outside the Order Limits, you propose if any, in relation to the siting of the substation/additional substation or its component parts.

Necton Parish Council asked Vattenfall to consider two alternative sites to the one selected. One was within the 3km 'acceptable circle' and one outside it. The site within the 3km circle is Top Farm. The road to the site chosen for access to the proposed substation site passes through Top Farm, which can potentially accommodate both the converter halls and the National Grid substations. It presents fewer issues as the site contains a significant amount of low ground and there is no contamination from the 1996 plane crash. The current plan for the National Grid substations is to replace one pylon with two pylons to allow connection to the grid network. We believe the Top Farm site would only require the replacement of one pylon with one new pylon so there would be less effect on the visual amenity of Necton both from the lower construction of the converter halls and National Grid substations. The cable route should be shorter so there should be no effect on the overall economic viability of the project.

We are not certain whether the Order Limits include the whole Top Farm site but they certainly include some of it because the proposed access road for the proposed substations runs through Top Farm. It is adjacent to the proposed cable corridor route and was already offered to Vattenfall for sale.

In addition, the Environmental Statement, Volume 3 Appendix 4.9, on page 24 shows a dash for any effects on tourism. The harm to the nearest luxury holiday let, on St Andrews Lane, would be significant from the proposed National Grid substation activities. This tourist business has already been subjected to significant light and noise pollution from the previous, smaller Dudgeon substations' construction. Vanguard and Boreas will each be larger and their construction will each take longer than Dudgeon.

Necton Parish Council's preferred alternative Top Farm site is further away and in a dip so the effects from construction on Necton in general, and in particular on this tourism business, would be minimized.

URN: 18.37 *Do you agree with the reply that the Applicant gave to WQ18.21 [REP1- 007]? If not please comment further*

The applicant has identified a number of additional items that have not been included in their assessment of agricultural land loss e.g. mitigation planting, roadways, etc. and states they are not significant. Since the loss of agricultural land is an important issue for the United Kingdom, we request that the applicant be asked to provide a more accurate assessment of the actual land loss.

URN: 19.29 *In the Applicant's response to NCC's LIR [REP2-005] you state that the decision to establish a Community Benefit Fund (CBF) would be made post Financial Investment Decision (FID) and the potential for a CBF is outwith the DCO consenting regime and therefore wider community benefits should not be taken into account when determining the application. If a development plan policy relating to the provision of a community benefit appears to you to be relevant to development proposed within the Order limits what is your view as to the applicability of the policy in light of the DCO consenting regime? Please list any such policies.*

Vattenfall has told Necton Parish Council that they do not have to provide any community benefits. Further, Vattenfall have stated that there will be no agreement on any benefits package until after the DCO has been approved. Therefore, it is possible that none would be provided. If the DCO is approved, there will be a significant, lasting effect on Necton from this huge infrastructure. Therefore, we request that provision of proportionate community benefits be stipulated in any DCO approval conditions.

In addition, Necton Parish Council endorses the representation from Jenny Smedley on behalf of the Necton Substation Action Group on 6th March. This representation provides a link to the existence of 'Best Practice Guidelines for England' covering 'Community Benefits From On-shore Wind Developments'. We believe it is reasonable to apply the English guidelines here, to the on-shore infrastructure attached to an off-shore wind farm.

Necton Parish Council
12 March 2019