

From: [NectonSubstationAction_Messenger](#)
To: NorfolkVanguard@pins.gsi.gov.uk
Subject: ADDITIONAL TO PREVIOUS PUBLISHED SUBMISSION
Date: 19 March 2019 09:04:42

ADDITIONAL TO THIS DOCUMENT - WITH NEW

INFORMATION: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010079/EN010079-002618-DL4%20-%20Jenny%20Smedley%20-%20Deadline%204%20Submission.pdf>

Dear Planning Inspectorate,

We contacted Vattenfall asking why they were quoting a point from the Scottish Guidelines for offshore wind community benefits, which are irrelevant as they were devised for use in another country, instead of these English Guidelines

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/363405/FINAL_-_Community_Benefits_Guidance.pdf which while ostensibly being for onshore wind, are at least for England, and cover community benefits for onshore infrastructure, which of course their Vanguard project entails vis a vis landfall, cable corridors and substations.

This is their reply:

Dear NSAG,

Thank you for your message, we are aware of the document you quote.

We have quoted the Scottish guidance, with reference to one key point only. Namely that any discussion with regards the benefits available to the community, as a result of hosting infrastructure which is vital to UK development (like energy - essential in almost every aspect of our lives), should be undertaken outside and completely separate to discussions pertaining to the EIA and DCO process.

The reason why community benefits aren't discussed in the DCO process is because it can quickly look like a 'bribe' to a local community.

However, we will initiate conversations in relation to community benefit at the appropriate point, through an appropriate consultation process.

I hope this helps to clarify.

Kind Regards

Sue

It appears to us from this response, that Vattenfall are admitting that they trawled through the Scottish Guidelines specifically to find and quote a single ('key') guideline that was convenient for their preferences, whereas the English Guidelines for onshore infrastructure state the exact opposite. They admit that they are not using the Scottish Guidelines in any other way. They also say that the guidelines are there to protect them from appearing to be bribing the community.

1. The guidelines are not there to avoid the developer being accused of bribery, they are there so that the community may be engaged in benefits without feeling they cannot then object to the project. *"Contributing to community benefit discussions does not affect an individual or organisation's right to express a view on the development proposals, and objecting to or supporting the development does not affect their right to discuss the community benefit proposals."* This point is made in both Scottish and English Guidelines.
2. Vattenfall have offered small gifts to small organisations in Necton - does the developer not feel

these acts are more likely to encourage accusations of bribery, rather than negotiating through the proper channels?

3. Why have they not quoted any other advice from the Scottish Guidelines?

4. Why have they not quoted advice from the English Guidelines, which they admit they are aware of?

5. This is what the Scottish Guidelines actually say: '*...it is recommended that discussions on the development itself and discussions on community benefit proposals are held in two separate forums or at separate times in the development process...*' This is not what Vattenfall are saying when quoting this document. It does not say that community benefits cannot be discussed before DCO. It does not say that they cannot be discussed during DCO, just separately from it.

We ask that the Planning Inspectorate question Vattenfall's ability to conduct themselves correctly on a project of this size with the huge ramifications it has for communities. Considering they have gone so far as to tell George Freeman and our Parish Council that they do not have to give us **any** benefits, we do not think they are suitable developers for a project of this magnitude.

Jenny Smedley for NSAG

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