

From: [REDACTED]
To: [Norfolk Vanguard](#)
Subject: Written copy of oral submission made 24th April at Dereham
Date: 25 April 2019 10:33:33
Attachments: [Vattenfall ISH6 speech.docx](#)

Dear Planning Inspectorate Vattenfall case team,

I attach, as requested, the written version of my oral representation made during the Open Floor hearing in Dereham last evening... together with a short supplemental comment, having checked the response given by the Applicant, regarding the Visual mitigation

This is likely the last interaction I shall be having with yourselves. I would like you to know that I have found the case officers and the panel a pleasure to work with.. the fair, but disciplined approach to all matters and all parties has given me every confidence that all documents WILL be properly and fairly reviewed and that the recommendation of the Examining Authority will neither favour nor fear any party.

.. whether the Secretary of state agrees or disagrees with the finding of the Examining Authority, is something none of us can take for granted... but, in similar circumstances, it would be a pleasure to work with any or all of you again on other matters for PI consideration, should one arise.

Regards

Julian Pearson

[REDACTED]
[REDACTED]

Vattenfall Open Floor hearing 24th April 2019 7pm Dereham 6th form college.

Introduction.

My name is Julian Pearson. I sit on Holme Hale Parish Council and as per previous attendances with the inspectorate, represent the interests of the Parish Council here today.

Main

As opportunity was not permitted at that time, I would like to ask the Examining authority to cast their minds back to the site visits around Holme Hale and Necton about a month ago and recall that all too regularly, the Dudgeon substation was used as a point of reference towards the western end of the vista affected by the development of Vanguard and it's related National Grid Infrastructure, for which the applicant is also responsible for representing in it's request for consent to develop... I bring this up because it relates to our historic experience, which drives our concerns today.

Despite being some distance away, those two buildings, which stand 10m high and both 22m wide and 11m wide respectively, (because of their different orientations) on their southern elevation contributes significantly to the visual impact that we, locally, are now left to endure.. By my own calculations derived from images supplied by the applicant to Eastern Daily Press a couple of years ago, EACH of the Vanguard main buildings is almost twice the height and five times the width on their southern elevation, of the larger of the two dudgeon buildings.

The Dudgeon development lack of adequate mitigation, stems from a mitigation plan that centred entirely around the planted landscape (which even now, 4 years on, is less than a metre high).. just as the applicant here only details the planted landscape mitigation plans it has.

In addition, the approval decision by Breckland District Council, list of conditions, associated with the substation aspect.. specifically condition 9, also relies solely on the planted landscape, with one minor reference to also having a lighting plan.. though the latter seems to have made little difference to the late night illuminations the locals had to fight for many months to get switched off.

I trust the examining authority will therefore understand the worries that we have, that this considerably larger development, with it's similarity of narrow content written mitigation plans could exacerbate the visual scar left by Dudgeon, many times over.

Applicant response to Horlock

I appreciate that the Examining Authority is required to consider two different policies when reviewing the landscape mitigation NPS EN-5 and NPS EN-1, where, within the latter, sections 5.9.5 thru 5.9.8 refer to the applicants responsibilities with regard to their assessments of the visual impact and the mitigation they intend to apply and 5.9.22 which makes suggestions relevant to the substation. I appreciate they take precedence over other documents, but actually they also compliment the various self-governed industry standards such as the Holford and Horlock rules, the latter of which I raised at a previous hearing on 10th December, in Norwich asking the applicant to detail how they had addressed Section 3, subsection 7, notes 1 through 9, (a more detailed guidance than 5.9.22 of EN-1) the applicants representative claimed in a subsequent hearing to have addressed "every one" of the Horlock rules, in their response to my request.

I would draw the Examining authority's attention to document "**Chapter 4**" of the applicants submission documents which I believe is the response to which they referred. They claim to address the Horlock rules in table 4.3 on pages 21 through 24 inclusive.. however they only address the heading guidelines in section 3. When it comes to the 9 short design notes attached to Section 3,

subsection 7 which is the key relevant guidance on visual mitigation of substation design, because they address everything from buildings, materials, colours and site layout for example, using one part to help shield sight of another.... the applicants only response to it is.. and I quote

“Landscape and visual impact will be minimised by avoiding the use of tall structures and buildings wherever possible. The onshore project substation will be subject to detailed design post consent.”

The term “wherever possible” must be code for “but we can’t actually achieve this”, given the two 19m tall buildings and the 25m lightning towers in their proposal.. but lets set that aside..

I am sure that I am not the only person here tonight that find that “non committal, committal” both astonishing and more than slightly offensive in that the public’s concerns regarding a matter of such significant importance, mentioned throughout all interactions with the public in the consultation and their subsequent considerations can be dismissed by such a deferral that smacks of an intent to do the absolute minimum that the consent conditions require.. repeating the shortcomings of the conditions attached to the consent given to the Dudgeon substation.

The applicant has furnished thousands of pages of investigation into habitats, erosion rates, cable corridor design and indeed technical variations for the substation, yet, despite the National Grid company building connection infrastructure day in, day out and Vattenfall making a budget plan, in part to cover the cost of their DC conversion infrastructure for which significant design would need to be known, they have only deemed to present a “representation” of what will be the development. For a company wishing to satisfy the concerns of a worried public, it beggars belief that not even the principles of visual mitigation design, outside of the planted landscape, have been proposed, ... details are withheld, based on the final infrastructure not being known...

HOWEVER, under the “CUSC” code which is the **contractual framework for connection to, and use of, the National Electricity Transmission System (NETS)**, the component parts and layout would have been almost immediately known to them... as CUSC is prescriptive.. for both National Grid Company infrastructure and Vattenfall’s two transmission options of DC and AC... based on the capacity they intend to put through the substation.. though admittedly there is some minor flexibility to do with space clearances between pre-existing infrastructure at the National Grid Company site.

I am also advised that Mr. Kevin Wells of the National Grid Company Network Optimisation Dept. worked with the applicant through part of 2017 and throughout 2018 on the designs

I mention this, because formal requests for details about the development have been long standing.. more recently, requests were submitted by a member of the Little Dunham Parish Council (Mr Ian Harding) regarding the length and width of the proposed buildings, to be met with the all too common ‘we do not know yet’.

As a consequence, we find ourselves here today, debating the potential impact of a ‘rough representation’, not a factual design, to which end, any responses the applicant makes, are of equally limited value.. and zero commitment, with a “We didn’t do it that way, so it’s not relevant” type scenario, waiting in the wings.

When I wanted to build a livestock barn, I was required to supply detailed drawings of all elevations and an accurate plan view of the same, showing precise location and orientation, and listing all the materials to be used, against which the powers that be, deliberated and decided.. yet here the examining authority is challenged with trying to consider the visual impact of a development based

on plans which, quite frankly, are an approximation at best and at worst, could be distinctly different from the reality, even though the information would appear to be readily available to the applicant.

The explicit deferral of their detailed mitigation plan (outside of the planted landscape element) until AFTER consent has been granted, does nothing to placate the local resident fears, that the only mitigation that they will be required to do, will be that defined by the conditions set within the consent... and though I have every respect for the knowledge and experience of the panel, and appreciate that it can, and should, ensure visual mitigation forms part of a legally enforceable condition, under the EN-1 and EN-5 policies, is it the role of the examining Authority to lay down the principles by which the applicants mitigation design should adhere?.. or is it, as I believe, to critique one commissioned and submitted by the applicant and seek amendments for the applicant to redesign and propose alternatives where the examining authority deems it an inadequate element of the submission?..

Given the evidence of their own response, I put it to you Ma'am that, in my opinion, the aforementioned sections of EN-1 are yet to be satisfied.

Submitted to the examining authority, Post Open floor hearing, as requested.

SUPPLEMENTAL COMMENT

The applicants response on the evening, was to direct the public to chapter 29 of their Environmental assessment.. however looking at that document, it still only refers to the planted landscape, and no other form of mitigation... which only goes to strengthen my point. The applicant is only proposing a single form of mitigation in their documentation and we, the local public, are being asked to trust them to develop a wider variety of mitigation, AFTER they have consent.. just as Dudgeon did.