

From: [REDACTED]
To: [Norfolk Vanguard](#)
Cc: [REDACTED]
Subject: Re: Norfolk Vanguard Project – EN010079
Date: 01 June 2019 12:43:48
Attachments: [Final Submission.docx](#)

Our Reference: 20011733

Dear Planning Inspectorate,

Please find attached our final submission for the Norfolk Vanguard Project consultation.

We apologise for the late submission but we were waiting to view the response from the Developer to the Inspectorate's questions as per the email dated 21 May 2019 below.

However, as the deadline has passed without response from the Developer we hope you can accept our submission.

Thank you for allowing us to be part of the consultation. We have the highest regards for the panel who have been very courteous and accommodating to our plight regarding this project.

Yours sincerely,

Ray & Diane Pearce

Our Reference: 20011733

Dear Planning Inspectorate

OFF-SHORE WIND FARM CONNECTIONS

"The EIA Directive states that Environmental Statements should include a description of "interrelationships" between environmental aspects likely to be significantly affected by a proposed development. The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Paragraph 5) states that "the EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant impacts of the proposed development on the following factors: a) population and human health; b) biodiversity.....; c) land, soil, water, air and climate; d) material assets, cultural heritage and the landscape; e) the interaction between the factors referred to in sub-paragraphs a) to d)."

1. As the consultation for Norfolk Vanguard draws to a close, we have a passionate plea to the Planning Inspectorate to consider the establishment of an Off-shore Ring Main (ORM) as part of their recommendation to the Secretary of State. As with other ordinary members of the Public resident in Norfolk, our lives will be severely impacted should either, the Norfolk Vanguard Project, and/or the Norfolk Boreas Project, or Ørsted's Hornsea Three Project be granted a DCO with an on-shore development; the impact on the Norfolk countryside will be unprecedented. Therefore, we request that further consideration and necessary consultation is given to the establishment of an ORM as a matter of National importance and urgency.
2. The ORM would take no longer to plan and construct than the on-shore elements of the Developer's current application. Indeed, the technology and engineering for off-shore substations, collecting and combining the output from each individual turbine, is published within the Developer's application. Simplistically, it would only require the connection of all the collector substations for each off-shore wind farm project together, in order to create an ORM. We consider the lack of commitment or consultation for any alternative transmission system as a failing by the Developer and the NETS operator National Grid plc who have recently evolved their electricity transmissions business to a new company – National Grid Electricity Transmission Systems (NGETS).
3. We respectfully draw your attention to the Developer's statements in the PEIR, as follows:

NTS Para 6 - *"... our key drivers are providing cost effective energy security for the UK, reducing greenhouse gas emissions, and maximising economic opportunities through investment in the UK."*

To be clear, 'cost effective energy security' will also provide a significant profit for both Vattenfall and NGETS. We reiterate from our previous submissions, it is a failing of the current UK energy provision, as overseen by the Secretary of State, that 'for profit' companies can utilise the current permissive planning and energy infrastructure legislation in order to make a profit, whilst damaging the UK's environment. We are not against renewable energy but contest, in the strongest of terms, that the environmental damage to Norfolk, as a whole, will far outweigh the benefits from 'reducing greenhouse gas emissions.' Regarding the environment, the Norfolk Vanguard project will not discuss the greenhouse gases released or environmental impact from: the construction of hundreds of wind turbines made of steel supported by concrete; the fossil fuels used to construct, maintain and decommission the project, both on-shore and off-shore; the plastics which will be left in the ground after decommissioning; the noise, light and heat pollution created by building and operating an extension to the Necton substation; the Developer considering that digging a 60 kilometre trench across Norfolk will only have a "minor" impact on the environment. If the intent of any off-shore wind farm development is to 'save the environment' then due consideration for any development remaining off-shore, in its entirety, has to be

considered as an alternative. Norfolk Vanguard has given no alternatives for its transmission system and the ES is woefully inadequate to meet the requirements of the EIA Directive (referenced above). Furthermore, the Developer's driver to reduce greenhouse emissions is questionable when consideration of the profits Vattenfall can make are taken into account.

4. Whilst we do not contest that the UK can grow by "*maximising economic opportunities through investment*", we are skeptical that this growth is being provided whilst making profits for a foreign government. There is a lack of UK governance on how this investment is being made and there is potential for the county of Norfolk's environment to be irreparably damaged. Within the consultation, we have proposed the provision of an "Off- Shore Ring Main" (ORM) as an alternative. The savings of a collective solution for connection points to the grid, rather than each developer having to design and construct lengthy individual transmission systems, is obvious, and the saving to the on-shore environmental impact absolute. Without doubt, this would be the common sense and logical approach.
5. As in their recent email to the Necton Substation Action Group (NSAG) NGETS' position on the ORM proposal are purely economic, as follows:

"As you may be aware the Electricity System Operator produces a yearly assessment of connection projects called the Network Options Assessment to assess the feasibility and the economic benefit to consumers, of existing and future projects.

As part of our NOA work we are currently looking to see if an Offshore-Ring-Main (ORM), would potentially provide a greater economic benefit for consumers in future. However, it is unlikely that existing projects in R3 will deviate from their current design, given the timescales required to implement an ORM approach and the commercial and economic implications, to both our customers and consumers, of delaying these existing projects."

We indeed contest that projects in R3 **should** deviate from their current design, if there will be an environmental saving by doing so; is this not why there is a requirement to explore '*alternatives*' within the infrastructure planning process? Furthermore, the cost savings for Developers by not having to design and develop their individual on-shore transmission systems could also be passed on for the '*economic benefits of consumers*'. NGETS' argument to not press ahead with an ORM are counter intuitive and of self-interest for their profits. We maintain that the establishment of NGETS within the National Grid plc group is to allow them to profit from gaining assets through the OFTO process and, therefore, it is not in this company's interests to develop an ORM. Clearly, a collective solution for the Developer to connect Norfolk Vanguard to the NETS will satisfy all their directives (stated above), thus:

- a. Environment savings with no damaging on-shore infrastructure and less green-house emissions during construction, operations and de-commissioning being that all their assets will be off-shore.
 - b. Cost effective energy security as the individual project costs will be vastly reduced, despite NGETS being able to levy a connection charge to pay for the ORM.
 - c. Maximising investment in the UK by helping to build the ORM during their off-shore development as the engineering and technology is identical to those in their application.
6. In addition, the environmental impact and disruption which will be forced upon the Necton area by the Norfolk Vanguard and Boreas projects, requiring the build of a new substation adjacent to the existing NETS substation, and, despite there being alternatives available, have been grossly understated by the Developer. The ORM will remove this requirement and save Necton's environment from yet another devastating impact. The potential for this impact was caused by National Grid plc making the decision for Norfolk Vanguard to connect to the NETS at Necton solely on the company's profits with a lack of compunction to invest in infrastructure. Neither National Grid or Vattenfall have any regard for the environmental impact or residents of the village when it comes down to how much income each company will make.

7. Importantly, as off-shore wind projects are of 'National Significance' we ask that NGETS' or the National Grid Group, are forced to be involved outside of its own procedures and outdated licences; waiting for the next NOA is just not adequate. Therefore, we respectfully ask that due comment is made to the Secretary of State to amend the process. We maintain that NGETS is complicit in its disregard for environmental issues and is hiding behind outdated legislation. We continue to contest that it is not in the Public's interest to allow the planning decisions for NIPS projects to be undertaken by a 'Public Limited Company' as they have a conflict of interest to balance investment in infrastructure with maintaining profits for their shareholders. NG is investing very little to upgrade the NETS to accommodate the burgeoning growth from off-shore developers and has allocated connection points without any sensible co-ordination, other than where they may have spare capacity. We reiterate allocating connections to the NETS "on a first come, first served non-discriminatory basis" is ridiculous when considering the importance of renewable energy to the UK's economy.
8. Throughout the consultation process the Developer has quoted "The Rochdale Principal" on many occasions; what is good for them is also good for the people of Norfolk and ultimately the UK consumer. Therefore, a better and more developed alternative for solving the transmission and connection to the NETS problem has evolved during the consultation period, and due consideration should be given to the ORM alternative. It is not reasonable for NGETS to assume that the Developer will not ... *"deviate from their current design"* nor to assume that sensibly delaying the project will have *"... commercial and economic implications, to both our customers and consumers ..."* otherwise there is no point in having a consultation process! This statement alone indicates the arrogance of the National Grid Group believing that the project will be granted a DCO, a mere tick in the box, to meet their timescales with no contingency for the supply of electricity to consumers if the application fails.
9. Finally, we implore the Planning Inspectorate to recommend to the Secretary of State for the Norfolk Vanguard Project, due to the exceptional environmental impact and disruption proposed for Norfolk and its residents, to consider either refusing the DCO or delaying the project until an ORM can be established; an ORM which would accommodate all future off-shore wind farm developments.

Yours sincerely,

R S & D Pearce