

20th May 2021

To: Gareth Leigh
beiseip@beis.gov.uk

For the Attention of: The Rt. Hon. Kwasi Kwarteng
Secretary of State
The Department for Business, Energy and Industrial Strategy

Dear Mr. Kwarteng,

Re: The re-determination of the DCO for the Norfolk Vanguard offshore wind farm

I have read your letter dated 29th April 2021 and would like to forward my comments on the redetermination process you outlined.

You asked for responses on three question:

1. The procedure you intend to follow.

I am concerned that the procedure you intend to follow will only look at the cumulative landscape and visual aspects of the combined Vanguard and Boreas projects because that was the subject of the Judicial Review. There are also other combined aspects that may appear acceptable for the two separate halves of the project that could look very different if they were added together. Ones that immediately spring to mind are noise and traffic. The two projects were described to the residents of Necton as being 10 years apart. The assessment of the effect along the whole of the cable route, including Necton, would be very different if all the lorry movements, for instance, were to happen at once rather than be separated by ten years. The noise effects may be gradually reduced as the trees grow but building everything simultaneously or close together in time will mean that the whole of the noise will happen at once, rather than the second half being added 10 years later.

The two projects are inextricably linked, using the same National Grid connection point, the same on-shore cable ducts and with their DCOs being examined at the same time. This means that they should have been submitted as one application in the first place. The examination should have had access to all the information from both projects so that a proper cumulative evaluation could have been done from the start. The process going forward should be to rewind the Vanguard and Boreas examinations and for them to be submitted again as a single project.

2. Whether as part of that procedure, he should ask the planning inspectorate to re-open the examination to consider the cumulative landscape and visual impacts at Necton

I think the planning inspectorate should consider the cumulative impact of Vanguard and Boreas but as part of a new application for the combined projects.

3. Whether Interested Parties agree with the Secretary of State assessment of the situation set out in paragraph 6 above regarding the additional materials that will put him in a better position to make the assessment of cumulative landscape and visual impacts in the re-determination of the Norfolk Vanguard application and whether

Interested Parties consider there to be any further documentation submitted as part of the Norfolk Boreas examination that would be helpful in this regard.

I have been an interested party for both the Vanguard and Boreas examinations and have listened to the hearings and read the representations. One thing I would like to say is that experts do not always agree and all the experts for both examinations have been put forward by the applicant. The accuracy of the visualisations has been questioned by Colin King, supported by Necton Parish Council and the Necton Substation Action Group. Coastal erosion was another subject that was disagreed on by people with local knowledge in the Issues Specific Hearings for Vanguard.

While there was much useful documentation submitted during the Norfolk Boreas examination, impartial mitigation expert advice should be used in assessing the balance of harm versus the cost of such mitigation.

Paragraph 6, which also refers to paragraph 5 and a design review, does not have a remit of landscape and visual aspects of the projects in terms of meaningful mitigation. The wording is only: "design, building materials, layout, colouration and finishes". Necton Parish Council requested either high bunds with trees on top or relocation to lower ground nearby and neither option was considered seriously by the applicant. A design review is unlikely to change this already established position.

Yours sincerely,

Alice Spain