

**From:** Colin King [REDACTED]  
**Sent:** 20 May 2021 18:56  
**To:** Energy Infrastructure Planning <[beiseip@beis.gov.uk](mailto:beiseip@beis.gov.uk)>  
**Subject:** Norfolk Vanguard, Norfolk Boreas

Department of Business, Energy and  
Industrial Strategy.

Necton  
Norfolk  
20 May 2021. Norfolk

Vanguard Project EN010079 ref 20012468  
Norfolk Boreas Project EN010087 ref 20022983

Dear Mr. Leigh,

Re. Request for information following the High Court's decision to quash the Norfolk Vanguard Offshore Wind Farm Order 2020.

The Secretary of State's letter, 29 April 2021 requesting information following the court's decision to quash the Norfolk Vanguard offshore wind farm order 2020, is showing an intention to only redetermine the landscape and visual impacts caused by the cumulative effects of both Vanguard and Boreas projects at Necton.

The High Court Decision deliberately gave no specific direction on how the implications of the judgment should be handled and did not limit the redetermination to only landscape and visual impacts.

Unfortunately there are other areas of concern, including operational noise. For example within the immediate surrounding area of the substation field there are period hamlets that are very quiet and tranquil. One set of background sound monitoring results were shared by both projects. Of 12 agreed long term (1 week) monitoring points only 2 provided data for 1 week and 1 provided data for 1 day. This limited data was then used by both projects. An average background sound level at the nearest sensitive receptor of 28.4 dB was derived, and an operational noise limit of 35dB 5mins and 32dB 15mins was set. In quiet tranquil rural areas this amount of noise generated would be constant and unbearable.

I contended this in my submissions through the Boreas examination, with no explanation gained.

The Secretary of State's intention to use the final Boreas design and access statement for his redetermination is not satisfactory.

All evaluations of visual and landscape impacts through the Vanguard and Boreas examinations are based on one set of photo montages used for both applications.

At the end of the Vanguard examination and all the way through the Boreas examination I contended there was a fault with the generated photo montages showing the substation converter halls in the existing landscape at 2 of the viewpoints. I live within 1km of these viewpoints, and I am familiar with the landscape. The discrepancies show the development to be less impactful than I believe it would be in reality.

Through responses to my submissions it was suggested that a counseling landform may have been generated because the computer package used can use the height of existing trees (which there are) to artificially increase the ground level to generate a non-existent land form.

I was also disappointed to learn that the visualisations were generated by using at least 3 unconnected computer packages, and that the converter halls were generated and placed carefully using existing features like church towers and pylons. The combination of inaccuracies and free hand work I feel is unsatisfactory to base the judgment of the potential impacts caused by these significant projects in combination. Structures as large as the converter halls need to be scaled and placed accurately using vectors and vertices to judge their impact, and to decide whether as The

Hon, Mr Justice Holgate voiced in his judgment paragraph 133, Necton is a suitable site for both projects cumulatively.

A consideration of this scale and importance needs to be based on photo montages that have been independently verified or independently and accurately produced, with full transparency regarding their production. This in turn would require a revaluation of the design and access statement.

I question the use of the Rochdale Envelope when trying to evaluate the potential impacts caused by such an out of scale and character construction, more detail is needed, also this project's out of character nature causes more, different questions to the original Rochdale business park development.

The runoff water from the whole combined substation site would all have to pass down a small stream running within 3m of houses through a hamlet with a small bridge as a pinch point. Technically it can be done, but it's not ideal and needs reevaluating cumulatively.

These are just examples that I am familiar with, there will be more, which points to the need of a new planning examination where both projects are combined as one full scale project where the full impacts can be evaluated, without the complications of scenarios.

It has been mentioned that there is a commitment for a design review. This needs to be a proper independent review for a project of this scale and sensitivity, not just a local forum which has been suggested.

Yours Sincerely Colin King.