

Response from Necton Parish Council to the Letter from the Secretary of State, Issued on 5th July (and the following letter extending the deadline for responses), Requesting Comments by Interested Parties on the Submissions Made by the Applicant Concerning the Vanguard DCO
(Your reference number: ENO-10079).

Necton Parish Council note in the letter from the Secretary of State issued on 5th July in Paragraph 4:

"... but the re-determination will of course consider all elements of the cumulative impacts and in a later stage of the re-determination process (see paragraph 11 below), interested parties will be able to make representations on any aspects of the cumulative impacts of the onshore infrastructure."

And in paragraph 11:

"The Secretary of State will publish any additional information he receives from the Applicant and will then write to all Interested Parties to seek their views on the issues raised in this letter and in the submissions made by the Applicant. Following the receipt of responses to that consultation, it is likely that the Secretary of State will allow the Applicant and Interested Parties a final opportunity to comment including on the responses received to the previous consultation."

It is interesting to note that Necton Parish Council could not find any additional submissions concerning the cumulative impact assessment at Necton.

In paragraph 8 the Secretary of State also states:

"... The Secretary of State notes that the consideration of development consent applications submitted under the Planning Act 2008 process is primarily based on written representations. The Secretary of State considers that he either already has the information needed from the Norfolk Vanguard examination Library or will obtain the necessary additional information via the consultation process, thereby enabling him to consider cumulative impact properly without joining together the Norfolk Boreas and the Norfolk Vanguard projects in a single new examination. ..."

Necton Parish Council therefore assume that the Secretary of State considers that sufficient information is available from the Boreas examination to allow him to make a reasoned judgement on the cumulative impact assessment at Necton and elsewhere, although we have not seen the conclusions of the examination to allow any comment on them to be made.

We would like to submit the following comments to the Secretary of State:

1. The data presented by the Applicant on the visual impact of the project substations at Necton during the examination was shown to be flawed. No attempt has been made to correct this which puts into question the whole visual impact assessment which we believe has been significantly understated by the Applicant. The Examining Authority, and therefore the Secretary of State, has been mis-led by the

Applicant on the level of harm caused by the Vanguard and Boreas projects to the local environment.

2. The mitigation proposed for a project lifespan of 25 years and buildings 19 metres high, is tree planting that will not mask the buildings for at least 90% of the life-span of the project. This is woefully inadequate.
3. In making an assessment of whether any mitigation proposed is adequate, a balance of harm versus benefit must be made. Necton Parish Council has asked the Applicant for a range of changes that would improve the mitigation. The examination Authority did not ask the Applicant to justify their rejection of all these options. To make a reasoned assessment of whether the mitigation proposed is adequate, the good to the UK is obvious but the harm is not so obvious, but none the less very real to the inhabitants of Necton and the surrounding areas. For a proper assessment of adequacy, we believe that additional investigation into the available options is necessary. For example, none of the options proposed have actually been costed (including the inadequate mitigation proposed by Vattenfall in the DCO). For a relatively modest investment, acceptable mitigation would be possible which would make a significant difference to the impact of the project locally. For example, lowering the ground level of the project and using the excavated soil to build significant earth banks around the buildings and planting the trees on top of these banks. This would significantly improve the effectiveness of the screening provided by the trees. Although this was proposed during the examination process by Interested Parties including Necton Parish Council, the Applicant failed to give it any consideration whatsoever. Measures like this could help to reduce the harm in the planning balance of harm versus benefit.
4. Necton Parish Council fully support all the points made in the letter sent to the Secretary of State by Alison Shaw on behalf of 82 Parish and Town Councils in Norfolk. The avoidance of cabling criss-crossing Norfolk would be the best environmental option and Vattenfall have already got experience in providing this technology. The Secretary of State should refuse consent of the onshore part of the Vanguard and Boreas DCOs and force the Applicant to change their DCOs such that they become a pathfinder project for the OTN.
5. Undue haste to achieve the objectives of de-carbonisation could mean the longer-term benefits of the OTN are not fully realised through sub-optimal infrastructure. Only the Secretary of State has the power, and we hope the wisdom, to both see this and avoid that unfortunate outcome.

Necton Parish Council
17 November 2021