

IN THE MATTER OF AN APPLICATION FOR A DEVELOPMENT
CONSENT ORDER

AND IN THE MATTER OF THE NORFOLK BOREAS OFFSHORE
WIND FARM PROJECT

AND IN THE MATTER OF THE NATIONAL FARMERS UNION AND
THE VATTENFALL AGENTS KNOWN AS THE LAND INTEREST
GROUP

OUTLINE REPRESENTATIONS

1 Introduction

1.1 These are the Outline Representations of the National Farmers Union (“NFU”) and the Boreas Agents (agents acting for NFU members and their clients on this project.) The agents represented are Savills, Strutt & Parker, Bidwells, Irelands, Brown & Co and Cruso & Wilkin (henceforth known as the Land Interest Group (LIG) to the application for a Development Consent Order by the Secretary of State for Business, Energy and Industrial Strategy identified as the Norfolk Boreas Offshore Wind Farm Project order.

1.2 The objectives of the NFU are to champion farming in England and Wales and to provide professional representation and service to its members.

1.3 The matters raised in these Outline Representations are matters not only of concern to the farming owners of agricultural land affected by this DCO,

but also of concern to, and raise points of principle that will affect, members of the NFU having farm holdings that may be affected by similar Offshore Wind Farm schemes.

2. Consultation and Engagement

2.1 There have been constructive and proactive face to face meetings with Vattenfall and their agents. Heads of terms were sent out May 2018 and some of these have been signed by landowners who are in agreement to the principles of the scheme set out. But in the last few month further specific details have been requested in regard to the build for the voluntary agreements. Negotiations are still on going.

3.0 HVDC Cables and Converter Substation

3.1 It has been clarified by Vattenfall that they have and are applying for a DCO on HVDC cables and this will involve building a converter substation. The laying of HVDC cables should hopefully reduce the impact on land operations and farm businesses as the easement width required will be less and it is likely that only a small number of link boxes will be required which are situated on the surface of the ground.

3.2 Landowners are requesting further information on the converter substation which is to be sited near to the National Grid substation at Necton. We understand that the converter station is needed to convert the current from DC back to AC to enter the National Grid substation. Further information has been requested on the size of the proposed building, the height, what the building will look like and the external cladding. It is understood that the building may be 25m high.

3.3. At the present time the plans are showing for the new converter substation to be located at the top of a hill on a very prominent site near to Necton Wood. Further to a site visit on 10th September 2018 to look at the proposed elevated site, information has been requested on why such a prominent site position has been chosen as it will be visible particularly from the south and west.

3.4 Questions have been raised as to why the converter station is not being sited nearer to the National Grid substation on land lying to the north of the existing substation. This land lies lower down and is not as visible as the proposed location.

3.5 Vattenfall has stated that they have followed the Horlock Rules when considering site selection. Screening provided by land form and existing features should be taken advantage of and this is not the case with the proposed site.

4. Construction and Funding

4.1 Landowners from the start were notified by Vattenfall that they would be looking to carry out the project as two schemes Vanguard and Boreas. Vanguard is to be constructed first, with underground cables being laid in ducts. At the same time ducts will be laid to take underground cables for the Boreas scheme. Vattenfall has stated that they will need at least 2 years to lay the ducts and cables for Vanguard. There then may be a gap of a year before the start of the Boreas scheme. Further clarification is needed from Vattenfall on timings of construction and how and when cables will be pulled for the Boreas scheme. For example will working areas just be needed for jointing bays on the Boreas scheme? Landowners do not yet understand what the interference will be from constructing Boreas following Vanguard.

4.2 We first understand from Vattenfall that they did have the funding required for both schemes but confirmation on this is sort as during the examination of the Vanguard Scheme it became apparent that funding may be through CFD.

5. Cumulative Impact

5.1 Confirmation is sort from Vattenfall on whether a Cumulative Affect Assessment has been addressed of both of their schemes Vanguard and Boreas along with the Orsted Scheme Hornsea 3 which are programmed to be constructed at approximately the same time. Hornsea 3 is running north to south and Vanguard and Boreas running east to west. This greatly impacts the number of landowners affected and as this takes more land out of agricultural production.

6. Jointing bays and Link Boxes

6.1 It is understood that some link boxes will be needed with the cables being HVDC cables and further clarification is sort on how many there are likely to be and the location of the link boxes. Link boxes do stand proud above ground level and so greatly interfere with agricultural operations and are a hazard to farm machinery. It is extremely important to have further design information on link boxes and the siting of them. The preference is that all link boxes are located within field boundaries.

7. Field Drainage

7.1 Land drainage is one of the main issues which landowners and occupiers are concerned about on this scheme and some detail has been agreed in the heads of terms and we have not yet seen the wording that we would like included in the draft CoCP for Boreas.

7.2 LIG and NFU would like to see the wording in the CoCP to be included in to the Voluntary Option agreement. As yet this has not been agreed.

8. Soils

8.1 As above the treatment and reinstatement of soil during and after construction is one of the main issues of concern. Limited detail has been provided to landowners and occupiers. Again LIG and NFU would like certain wording to be agreed and highlighted in an outline soil management plan as part of the CoCP. It is important that soil reinstatement and aftercare is specified. Further information will be needed to show what measures will be put in place to bring the soil back to its condition and quality before the works took place. An after care plan should be included in a code of construction or soil management plan.

9. Flood Issues

9.1 No details have been provided to landowners and occupiers on how any increase in surface run off of water from the haul road or the construction compounds will be dealt with during construction. Therefore there is concern that retained land may flood during the construction works.

10. Dust/Irrigation/Private Water Supplies

10.1 Clarification is needed on how practical issues like dust will be controlled during construction and how can the effect on irrigation be

minimised? Further if any private water supply is affected a temporary and permanent supply will be needed.

11. Access routes to the Order Limits

11.1 At the present time Vattenfall has provided details of access routes it would like to use to gain access to the working strip. Issues have been raised by some of the agents that some of the access routes are not actually physically possible on the ground due to differing ground levels. In some instances there are better access routes available to reach the working strip but Vattenfall as yet has not engaged in agreeing viable access routes.

12. Request to Attend Hearings and make Representations

12.1 The NFU and the Vattenfall Agents known as LIG intends to lodge full Written Representations in due course and request to make oral representations at the compulsory acquisition hearing or any other hearings which may be held.

12.2 LIG represents approximately 60 clients who own or lease land affected by the DCO. A full list of names and addresses are available if requested. The members and clients have not been listed on this representation due to data protection. Each landowner or occupier has submitted an outline representation highlighting specific issues to the business and has made reference to this outline representation which highlights the main issues of all landowners concerned.

Louise Staples
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**OUTLINE
REPRESENTATIONS**

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