NECTON PARISH COUNCIL RESPONSE TO BOREAS PINS QUESTIONS Deadline: 10th December 2019

URN: Q5.3.3 Requirement 16 Detailed Design Parameters

The design and access statement (DCO Document 8.3) contains very little information on the converter halls other than a limited description of the equipment inside. There is an indicative layout, coloured green, that has nothing to give any idea of scale. There should be a person / vehicle / London bus inserted into the montage to allow anyone viewing the document to get a realistic idea of what the building(s) will look like with reference to something whose size is already known. Also the 6m aerials appear to be missing.

The apparent height of the buildings will also be dependent on where they are sited with respect to trees and the lay of the land. As the proposed development is on the highest point in Necton, information should be provided as to what geographical contour line will be the base height of the building. The DCO should specifically state the height above sea level of the base of every individual building on the substation site.

We definitely agree that the information should all be put in one place. The outline Landscape and Ecological Management Strategy should be specified in the same document as the Design and Access Statement covering the height and shape of the buildings.

We believe that all buildings should be restricted to a maximum height of 13m, including the converter halls. The land height should be lowered so the converter halls also meet the 13m height restriction. This will limit the visual impact on the village and surrounding rural areas.

URN: Q5.3.5 Requirement 18, Provision of Landscaping.

Necton Parish Council believe that the materials and colour of the buildings should be agreed with representatives of the local community. We would like to see a few examples of what is possible and be allowed to have a say in what is selected.

URN: Q5.3.11 Requirement 26, Construction hours.

Necton Parish Council would like to see the construction hours limited to 7am to 7pm. When all work has ceased, the lighting was frequently left on when the Dudgeon substation was being constructed. This caused annoyance to many people and we would appreciate a clause requiring lights to be extinguishes at 7pm. We would like the same requirements to be placed on National Grid.

URN: Q5.7.1 Procedure for Discharge of Requirements.

When 'schedule 16' was entered into the PINS website search facility, there were no matching records found. When 'schedule' was searched on the PINS website, five documents were identified but none detailing discharge of schedule 16. We are therefore unable to comment.

URN: Q5.8.1 Comment on Norfolk County Council's suggestion that funds could be made available for the benefit of resident and business communities affected by construction activities.

Necton Parish Council believe that compensation as a percentage of the project cost should be made available as grant money for green-only projects tied to geographical areas affected by both construction and on-going visual or other effects. For instance, this would allow additional mitigation planting to be done where a case is made by the Parish Council or other residents. It should be borne in mind that Necton will have long term permanent effects from this project when almost all other areas will only suffer transient effects.

URN: Q9.0.1 The Applicants Landscape and Visual Assessment.

The landscape and visual assessment methodology is subjective and appears to minimize the effects of the large buildings being planned at Necton. In the absence of scaled detail, the assessment methodology has serious flaws.

URN: Q9.0.2 Cumulative effects on landscape and visual effects.

Necton Parish Council supports the Necton Substation Action Group concerns. The Boreas project as well as the Vanguard project did not consider the alternative sites proposed by Necton Parish Council and the Necton Substation Action Group. The applicant's response has not addressed any concerns about the siting of the substation or the cumulative effects on both landscape and visual vistas.

The PEIR information seems to be lacking in clarification as to why the alternative sites have not been seriously considered.

We would like to see the documentation that assesses both alternative suggested sites, at Scarning and Top farm. We would also like to see an adequate mitigation strategy proposal.

URN: Q9.1.5 Visualisation Assumptions.

National Grid have provided vague information and no visualizations of their installation. Consequently Necton Parish Council cannot make any reasoned comments. For a project of this size, more information should be made available and time given for assessments and comments to be made.

National Grid have a published obligation to consult with stakeholders when planning an installation. We would like the Planning Inspectorate to ask National Grid for a copy of their consultation with Necton Parish Council and other stakeholders. The published obligation is for National Grid to consult with stakeholders in their own right, not through a third party.

One matter that needs more investigating is the new tower / overhead line proposals for the Necton / National Grid site. Greater detail is needed. It could be that, if an NG L12 termination tower is required, this could be up to 50 metres tall (164 ft). Even a 'smaller' L6 tower could be around 30 – 40 metres tall (approx. 100 ft). We recommend that additional information regarding this apparatus is requested as the towers would dwarf the new substation site extension with no real possibility of screening.

URN: Q9.2.1 Signposting documents for alternatives considered.

Necton Parish Council and the Necton Substation Action Group proposed two alternative sites. The applicant's response has not given adequate reasons for rejecting both these sites.

We would like to see the documentation that assesses both the alternative suggested sites, at Scarning and TOP farm.

URN: Q9.3.7 Advance planting.

Necton Parish Council are concerned at the length of time the mitigation planting will take to provide even inadequate cover. Advance planting is crucial to shortening the time taken for the mitigation Vattenfall are suggesting. Even so, it will not be adequate within the operational life of the installation but better than nothing.

URN: Q9.3.7 Height of structures at the substation.

HVDC substations are significantly higher than HVAC substations, approaching double in height when the lightning conductors are included. Necton already host an HVAC substation for a wind-farm connection to the National Grid, the Dudgeon substation. Necton Parish Council were informed by Vattenfall that there was only one Vanguard and Boreas proposal, for HVDC. When questions were asked about the less obtrusive substation building with an HVAC option, mirroring the already installed Dudgeon substation, we were told this was not an option. No reasoning or assessment was forthcoming. Necton Parish Council support renewable energy but would prefer an HVAC installation instead of the HVDC option proposed.

URN: Q9.6.1 Policy requirements for good design.

Only an indicative layout has been provided so far for the substations. This is not the first installation the Applicant will have carried out so there should be more

design details available that would allow an assessment of the quality of the design to be made. Necton Parish Council would appreciate more detailed information and the opportunity to make a reasoned comment on whether it can be classed as a good design.

URN: Q9.6.2 Design and access statement.

Necton Parish Council believe a meeting with the Boreas technical team covering the substation design details, height above sea level and mitigation plans are necessary to permit us to adequately assess any gaps in the design specification with respect to the substations.

URN: Q13.2.1 Effects on Tourism and Recreation.

All reference to tourism sites in Necton have been ignored by the Boreas application and the Parish Council are concerned about the effects on holiday lets, campsites, caravan sites and lodges for hire in the area close to the substation. Moving the substations to Top farm, lowering the ground level, making the installation HVAC and providing adequate screening would alleviate the likely effects on tourism.

Necton Parish Council 6th December 2019