

Planning Inspectorate
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Friday 6th December 2019

Norfolk Boreas Offshore Wind Farm

I am writing to formally submit my Written Representation for the application by Norfolk Boreas Ltd (on behalf of Vattenfall UK) to build the Norfolk Boreas Offshore Wind Farm. I wish to put on record that I remain firmly against this development, along with its sister application the Norfolk Vanguard Offshore Wind Farm, for the following reasons:

1. Lack of proper community consultation or a sufficient environmental impact assessment

As you will know from my almost ten years as the local Member of Parliament for Mid Norfolk (as well as in my previous roles as a PPS in the then Department for Energy and Climate Change, the first ever Minister for Life Sciences in the world, the Chair of the Prime Minister's Policy Board and, now, my role as the Minister for Decarbonisation, Disconnection and Digitalisation at the Department for Transport), I am very concerned at the insufficient level of environmental impact assessment and community consultation that has been carried out for this application, and others, when planning how best to bring Offshore Wind Farm infrastructure onshore.

As I have consistently made clear, neither I nor the people of Necton and the surrounding communities are against the principle of offshore wind energy or the necessary infrastructure required to bring it onshore. In fact, we hugely support it. Unfortunately however, as is the case here with Norfolk Boreas (and Norfolk Vanguard), the companies behind these Offshore Wind Farm applications are so often failing to properly work with local communities and account for environmental factors – seemingly because such Nationally Significant Infrastructure Projects do not come under local planning and they believe they can railroad their plans through via the Planning Inspectorate.

The result will be (and is already beginning to be) a plethora of Offshore Wind Farm applications hoping to bring their infrastructure onshore via a proliferation of cabling corridors that will cut across and damage internationally significant environmental habitats and top quality farmland to

reach inappropriately sited substations. No one, other than the applicants themselves, will be happy. This is bonkers!

We in Mid Norfolk (those in Necton itself, the surrounding villages, local councillors and myself) believe that, IF the community is to accommodate such Nationally Significant Infrastructure, then it should be given a proper voice to help site and screen it correctly – and also receive a substantial amount of community recompense. (In Necton, the A47/Tuns Road junction is considered one of the most dangerous in the county. The community and I have argued that, as part of any package to deliver Norfolk Vanguard and/or Norfolk Boreas, a proper solution to this junction should be funded).

As I have explained in my recent Relevant Representation and in all of my submissions for Norfolk Vanguard however, there is a widespread feeling amongst the local community, and their legal representation, that Vattenfall UK have considered the entire consultation process as a mere ‘box-checking’ exercise – going through the motions while never taking seriously the views and concerns being expressed by locals.

Designed to illustrate the proposals from the most forgiving aspects, the visual representations, some of which contained significant inaccuracies, have been inadequate and in places, it would appear, deliberately misleading. Even now, as we discuss this second application, I am struck by the fact that few, if any, of my constituents actually know the true scale of the proposals being put forward – and efforts (by myself and others) to obtain more accurate information has been repeatedly met with resistance. The applicant simply restates that they have complied with necessary legislation.

When detailed queries and concerns about the proposals have been raised by locals, time and again we have seen the applicant send back a generic set of FAQ style answers in response. These answers are, for the most part, vague and unhelpful and, having received such answers myself, I completely appreciate the community’s frustrated belief that their specific concerns are being disregarded as unimportant. I challenge you to judge this as being anything other than totally unacceptable. How can public trust in our planning system be maintained if the entire consultation process, for this application and others, comes across as complete sham?

In addition, had appropriate community engagement and a proper environmental impact assessment taken place, it would have been quickly realised that the site was the location of a significant F-16 fighter jet crash back in 1996. Although a clean-up operation was undertaken at the time, there remains a large chance that hazardous, and potentially radioactive, material may still contaminate the land today. **Construction, even on a minor scale, could well disturb any remaining contaminants – seriously affecting local wildlife and the water table.**

2. Inappropriate siting of the substation

Further to the above, had the applicant conducted a comprehensive and proper consultation process, they would have discovered that there is even more reason to conclude that this site is fundamentally inappropriate. Indeed, it is located on **some of the highest land in the county and overlooking a number of settlements. As I have stated repeatedly, the commitment to HVDC will only exacerbate the already significant visual impact of placing the development at this location,**

involving substantially larger structures approximately 25m in height. The substation for Norfolk Boreas, along with the one for Norfolk Vanguard, will span an enormous area also. Each one covers roughly the area of Wembley Stadium!

3. Failure to properly consider alternative sites

I would like to take this opportunity to remind everyone that the local community is largely not against the location of this infrastructure either. While they have spoken to landowners and suggested sites further afield, they have also consistently put forward alternative sites in the vicinity of the site in question – sites that would have a far lesser impact on the surrounding settlements and landscape. Vattenfall UK, however, have simply repeated that the siting put forward in their plans was the product of a long process – while never actually explaining what that process entailed, despite frequent requests for clarity. There is a strong suspicion that no exploration has been given to alternative sites and that Vattenfall UK are intent on forcing their plans through at the site in question because of cost and the fact that similar infrastructure is located at a site also in the village.

4. Announcement of an official Review by the Secretary of State

Such is the level of my concern about the completely unsatisfactory nature of the process that sees this Norfolk Boreas Offshore Wind Farm application, and previously the Norfolk Vanguard Offshore Wind Farm application, come before the Planning Inspectorate that I am now spearheading efforts at ministerial level. The total disregard for public opinion, as well as the irreparable damage being caused to our precious environment by the ramshackle approach of companies like Vattenfall UK is unacceptable – and, having spoken to parliamentary colleagues across the East of England, many of them are supporting me, reporting very similar experiences themselves.

I recently led a group of similarly concerned MPs to meet with the Secretary of State for Business, Energy and Industrial Strategy and her junior Ministers and officials – and I am delighted that she has made clear her intention to launch an official Review into the overall strategy for delivering Offshore Wind Energy in the East if the Government is successfully re-elected.

With a large number of these applications under construction or in the pipeline, it is clear that a proper strategic plan is needed for the delivery of this infrastructure in the East. I, and many others, argue that this most likely needs to come in the form of an Offshore Ring Main, but what is clear is the fact that, without such a strategic plan, we severely risk companies continuing to ride roughshod over the consultation process and trying to force through inappropriate proposals with little co-ordination and at the detriment of our precious Norfolk and Suffolk countryside.

5. The Secretary of State's delaying of a decision on the Norfolk Vanguard Offshore Wind Farm application.

I note that the Secretary of State has delayed a decision on the Norfolk Vanguard Offshore Wind Farm application and asked for additional information on a number of aspects – one of which is indeed mitigation for the visual impacts of the siting of the substation at Necton. I do not believe that even the very best mitigation methods will be able to reduce the visual impact of the siting of

this substation – something that the relevant planning authority will undoubtedly find when, as the Secretary of State is proposing, they are required to lock down in writing the mitigation methods for the exterior of this structure.

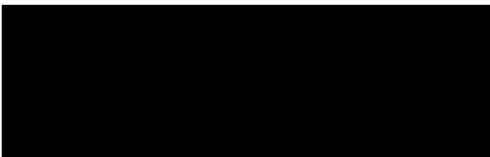
Concluding Remarks

Despite my efforts to try and broker sensible conversations between Vattenfall UK and the communities in an amicable environment that could allow for close co-operation and a path towards a sensible compromise (as I successfully achieved to bring about a few years ago in the case of the substation for the Dudgeon Offshore Wind Farm), Vattenfall UK have proven unwilling to productively engage. As a result, the wilful avoiding of any serious discussion with the people in my constituency (and, I suspect, across Norfolk) has culminated in Vattenfall UK bringing forward a wholly inappropriate set of proposals for both applications, and deepened anger and disillusionment from local councillors, councils, businesses and residents – not just at Vattenfall UK themselves, but also at the seeming lack of enforcement by the Planning Inspectorate of proper consultation.

For the reasons outlined in this letter (and in my submissions to date), I must therefore insist in the strongest possible terms that this application is not given approval – at least unless and until proper consultation has occurred and a set of more appropriate plans are put forward.

(I would like to reiterate my desire that all the submissions I have made during that first application are taken into account now. As explained in my recent Relevant Representation, the points raised in those previous submissions have become even more pertinent now with this sister application).

Yours,



George Freeman
Conservative Parliamentary Candidate for Mid Norfolk
Minister of State, Department for Transport