

From: [NectonSubstationAction Messenger](#)
To: [Norfolk Boreas](#)
Subject: Answet to Q9.0.2
Date: 14 December 2019 09:25:31

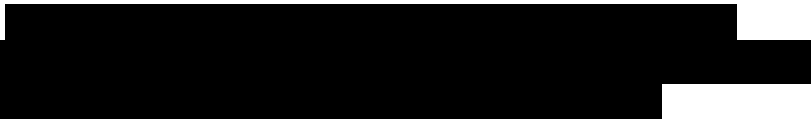
Consideration of cumulative effects on landscape and visual Has the Applicant's response to RRs [RR-014] and [RR-006] which questioned the way in which the baseline and cumulative assessments for landscape and visual effects have considered other existing and proposed substation infrastructure in the area proposed for the Norfolk Boreas substation works [AS-024, Table 1, No. 5] addressed concerns? If not set out what further information is required.

Please refer to our previous representation which we were notified that you had received in full with attachments. We have not sent the attachments again as this causes issues with your mailbox.

According to the developer, the purpose of the workshop was 'discuss the siting of the project substations'.

There was no discussion.

Here is our full and unbiased account of the 'workshop', which can be verified with many of the 80 odd people who attended, including Parish Councillors.

1. In July 2017 a 'workshop' was held, to consult the public on the options under consideration. This was the **first time** any official proposal was shown. There were 4 footprints, all in the same tight area.
2. Of the 80 odd people initially invited they were mostly parish councillors, others groups, local farmers, and people not affected directly by the substations. This group, the NSAG, protested and were allowed to add just 15 people at the last minute.
3. We saw no advertising, and the workshop was held in Swaffham, not Necton, thus limiting the number of people who could attend as not all have transport. When asked why the developer stated that the Community Centre in Necton was unavailable. Records show this to be untrue.
4. There was no sound system.
5. People could not hear.
6. The type of seating (round tables like in a restaurant, meant half the audience faced the back of the hall). 
7. The screens were an inadequate size. People at the back could not see them.
8. The pictures shown on the screen were not replicated with wall charts, photographs or information leaflets.
9. People were not allowed to ask questions or speak but were told they would be allowed to at the end of the presentation, some half hour or so later, although the original agenda said there would be a 'discussion' after every speaker. The agenda was changed without us being told in advance.
10. 99% of the people invited had never visited the actual footprint sites (which are situated on private land) and yet were expected to comment on the placing of the 4

footprints over half an hour after having a brief view of them on inadequate size screens.

11. The developer could have organised a site visit beforehand so that people would have had at least some idea of where it was in relation to their homes and businesses.
12. At every table there was a representative of the developer's, who 'shushed' any person who tried to ask a question. Even at the end, though they had been promised they would have an opportunity to ask questions, the attendees were instead told to 'write their comments and questions' on post it notes and stick them to one of the (hastily written/crossed out) posters on the walls.
13. These hand written posters did not make their purpose clear, with the result that there were almost no opinions on the actual footprints added to them. This was also in part because by then people couldn't remember what the screens had shown and had simply had no notion of the area proposed, or what the impact on that area might be of each footprint. People were not asked to put their names on the post it notes so they are anyway surely totally useless as evidence of opinions.
14. Only at the following Open Day at the same venue, were people shown computer simulations of the view of the substations from their own homes (at a height of 1.5 metres only), but by then no further comments were allowed to be put on the posters relating to what they were being shown.
15. The computer simulations missed out the National Grid construction entirely (which will increase by up to 18 acres depending on whether both projects go ahead or just one), and the view provided in that direction depicted an untouched field-scape, which did not show the existing Dudgeon substation or the existing NG substation, or the National Grid Vanguard and Boreas extensions.
16. When one of the invited residents asked about this, the response was that the developer could not include it because it was a National Grid development, and not the developer's. The developer was either being misleading, or total inept, because we now know from BEIS that the developer was already designing the National Grid extensions with NG, and that the developer was responsible for consulting on the NG extensions.
17. This part of the consultation was entirely inadequate, and should be done again – footprints with BOTH HVDC and HVAC options should be shown to residents on the ground, (and ALL residents of Necton, Ivy Todd and Holme Hale, Fransham, Little Dunham and Bradenham should be given a chance to access them). The 'workshop' should certainly not have been by invitation only.
18. Residents and our group were bemused and dumbstruck when the footprint chosen was announced, because as you can see from the attached examples of photos of the posters with their post it notes, they made few if any choices on the selection because they had no idea what the differences were, having never visited the site, or been given any proper information on them.
19. We would have taken more photos of the post it notes but were stopped by someone called 'Sean'.

Regards
NSAG

From: [NectonSubstationAction Messenger](#)
To: [Norfolk Boreas](#)
Subject: Responses to developers answers to Q9.1.1
Date: 14 December 2019 09:13:58

Q9.1.1

The developer states that "The relatively close proximity of many of the viewpoints reflects the enclosed character of the rural landscape surrounding the onshore project substation and National Grid substation extension. This has made finding appropriate viewpoints difficult as there are very few clear views apart from within the immediate setting of the project, and then from the more distant ridgeline 2.5 to 3 km to the south.

Owing to the enclosure from mostly tree cover and hedgerows in the rural areas, but also built form in the settlements, there are few available or appropriate viewpoints within the 1 to 2 km range. 2. There are not more viewpoints within areas of theoretical visibility shown on the Zones of Theoretical Visibility for the following reasons. Firstly, actual visibility is much more contained than theoretical visibility, owing to the enclosure of trees and hedgerows in the rural areas and built form in the settlements. This means that there are often no views or limited visibility from settlements and roads in the area. Secondly, many of the patches of theoretical visibility cover areas where there are no visual receptors, for example, areas of open field, and therefore there is no potential effect on visual amenity and no representative viewpoints need to be included. Thirdly, with distance, the likelihood of significant effects typically dissipates. This is often because the relative scale of the project decreases and the influence of the wider surrounding landscape or townscape increases."

During the accompanied site visits for Vanguard, we provided a red helium filled balloon, at the height and site of the substations, and the Planning team could clearly see it from every viewpoint. Thus they noted that in fact it could be seen from every direction, even from inside Necton village and outside Ivy Todd. We will be repeating this experiment or something similar with Boreas. It is also needed because the Vanguard team were identifying landmarks completely incorrectly during the site inspections, for instance they identified Bradenham Wood as Necton Wood (Rob Driver) from the viewpoint in Holme Hale, showing that their 'desk-based' assessments are completely useless in many regards, and that they had not familiarised themselves with the area 'on the ground'. It is frighteningly easy to see how the visuals for both Vanguard and Boreas can so very easily be misinterpreted and underestimated because the photomontages by the developers admission are not to scale or completely accurate. It does not take a genius to realise that buildings the scale of the converter halls will be impossible to hide. In fact their own PEIR states that it cannot be done. Breckland Council say that it cannot be done. If this project is given planning consent at it's current position and scale, presumably once it is built and the truth is there for all to see, we will be proven right, but it will be too late. To continue with this project in its current form would be a national disgrace, and would sentence Necton and Ivy Todd (and surrounding villages) to a lifetime of a hideous and irremovable immense blot on the landscape. Who will we be able to complain to then?

The developer's attitude in this can be easily seen by their not naming Ivy Todd Farm as a viewpoint, whereas as one of (if not the) closest receptors, the owners will see Vanguard and Boreas completely dominating their landscape, towering over them, and running along the entirety of their boundary. Of course the developer does not want the inspectors to see that.

NSAG

From: [NectonSubstationAction Messenger](#)
To: [Norfolk Boreas](#)
Subject: Q9.1.7
Date: 14 December 2019 09:38:33

Our response to the developer's response "1. 15 years growth which is shown as approximately 5 to 7m in height. 2. At 20 years approximately 6 to 8m in height. At 30 years approximately 9 to 12m in height. The views would not differ as the planting would be designed to include an under-storey to avoid openness between clear stems and ensure an effective screen from tops to bases. 3. In respect of viewpoint 1 it is anticipated that the height of mitigation planting will be approximately 7.5 to 10m after 25 years."

This demonstrates completely the issues of mitigation and how it will always fall short. In 25 years the planting will STILL fall at best 9m below the height of the converter halls which will be 19m, and 15m below the height of the lightning conductors, which will be 25m. We were told that there will need to be a lightning conductor on every structure.

At worst case scenario (which is what we understand should be used) after 25 years the planting will STILL be 11.5m below the height of the converter halls, and 17.5m below the height of the lightning conductors.

Similar figures apply after 30 years as all planting will still fall many metres below the height of both converter hall and lightning conductors.

This cannot be considered a viable or appropriate situation. It could only be considered an appropriate project for planning consent if the mitigation hides it from day one. Because day one is the true 'worst case scenario' when the planting will probably be a metre high.

NSAG

From: [NectonSubstationAction Messenger](#)
To: [Norfolk Boreas](#)
Subject: Response to applicants answer Q9.2.4
Date: 14 December 2019 10:02:00

Q9.2.4 The Applicant High Voltage Direct Current (HDVC) Were there any changes following the decision to adopt high voltage direct current (HVDC) technology? The decision to adopt the HVDC technology resulted in the following changes: • Removal of the requirement for a Cable Relay Station as above ground infrastructure near the Coast; • Fewer onshore cables resulting in a reduction in the width of the onshore cable route to 45m from 100m; • The width of the permanent easement is reduced from 54m to 20m; • Reducing the maximum number of jointing pits from 450 to 150; • Reduction on the number of offshore export cables from six to two; • The onshore project substation consists of an HVDC substation.

It is noted that they gloss over the fact that the substation will be considerably bigger as DC, and this is just put in with the 'positive' differences as if the negative difference did not exist. However they go on the state in Q9.4.1 "Based on the maximum parameters of an HVDC substation, the maximum height of the buildings would be approx 25m...it is therefore a statement of fact that a HVDC onshore project substation has a taller maximum height than a HVAC onshore project substation, due to technical requirements."

We are sure the Planning Inspectorate must understand the inherent difficulties in the general public's ability to understand 1000s of pages of technical information. This together with the question of financially acquired expert advice, which of course the developer has at will, will also affect the every day person's ability to argue their case, or indeed comprehend photomontages which are openly admitted by the applicant to be inadequate in their accuracy.

NSAG

From: [NectonSubstationAction Messenger](#)
To: [Norfolk Boreas](#)
Subject: Q9.4.3 Bunding
Date: 14 December 2019 10:18:18

The applicant states: "In terms of landscape and visual considerations, the options of lowering the ground level and large scale bunding...the best approach is generally to work with the landfall...in order to cut a level platform of 250m x 300m at a lower ground level would require a huge amount of earthworks and would fundamentally alter the character of the local landscape. Similarly, the introduction of large scale bunds would appear out of character in this traditional, rural landscape and at variance with the gently undulating landfall."

The developer is saying that in order to take sensible mitigation steps (ie bunds) to help hide the substation buildings results in making the project out of character with the landscape, when the project itself could not be more out of character with the landscape.

The mind boggles with the stupidity of these statements and premises. IF what the developer says is true and the character of the landscape would be altered by taking obvious and sensible measures to hide the hideous and offensive site of the massive converter halls, then surely it is up to the local residents and local authorities and parish councils to make the decision on which they would rather have, either an ugly and permanent blot and permanent effect on the rural landscape of several 25m high substation buildings, or some extra undulation and rise and fall of natural, tree-planted mounds and valleys. Only a complete idiot would think they would prefer the substations, which cannot ever fit in with the landscape.

We suggest that the developer is asked to re-consult on this matter.

NSAG