

Boreas 5

Dear Planning Inspectors,

We need clean energy solutions, but I believe that the Boreas onshore substation should be in an industrialised area, or better still connect to an offshore ring main to protect Necton and the Norfolk countryside.

I find it extremely disappointing that Breckland District Council have taken such a broad overview to this project, accepting it into Mid Norfolk, agreeing and signing off everything within the SOCG without first ensuring Necton's needs, for substantial mitigation, will be met.

I am very surprised to read the Norfolk Boreas Offshore Wind Farm Written Summary of the Applicant's Oral Case at Issue Specific Hearing 3 Onshore effects including the draft Development Consent Order

AGENDA ITEM 4 – Landscape and Visual Effects (Including Hedgerows)

b) Substations at Necton

ii. "At previous Environment Topic Group Meetings with representatives of the local authorities, the preference of the consultees was not to have large bunds around the onshore project substation as it was considered that this would appear incongruous with the local landscape character. Some subtle earthwork bunds that are of more modest height at around 1 to 2.5m have been considered as part of the propose landscaping planting at the onshore project substation (Section 6.5.1.1 and 6.5.2.1 of OLEMS [REP1-020]."

Please could the planning inspectorate ask the applicant to provide minutes of the above mentioned "Environment Topic Group Meetings with representatives of the local authorities"? (under freedom of information act)

I would like to know why local authorities have agreed with the applicant, and prefer not to disguise the substation using large, natural planted earth banks or bunds? As these would be far more harmonious and preferential to the visible substation infrastructure surrounded by trees and a few small banks. Even when fully mature they will be too sparse and inadequate to hide such a structure.

I would like to see a greater duty of care from both the applicant and Breckland District council regarding sound and visual impact mitigation around the substation. The mitigation on offer is not nearly enough to fully protect the nearby residents from noise or compensate for the loss of view. I have a good knowledge of the area and have studied landscape design and feel the tree planting schemes are inadequate as primarily designed to be just enough to hide the view from the general public (along A47) and is too sparse, even on maturity.

A representative from Vattenfall said that private views are not considered important, but I feel these should be considered as the most important, as seen every day by the people most affected, not just driving past. At an early site visit, [REDACTED] from Vattenfall promised to work closely with us and ensure we would have the best possible mitigation! But

in fact, as long as the majority of people are not affected by it, they have no regard for the minority, so their findings all conclude low or minor adverse negative impact.

My brother [REDACTED], being the closest resident, has been looking at this in more detail and questions the length of time for which long term background sound monitoring was carried out at Ivy Todd, as some of the days results are missing from the final figures. They have also totally missed sound monitoring at locations towards Bradenham, and Ivy Todd was missed completely when doing the short-term sound monitoring.

If this project is to go ahead with no changes, extensive earth bunds, even though expensive would help with deadening inevitable background noise and protecting the surrounding area. And even though Joe Philips, the applicant's landscape expert, argues these are not vernacular, when planted they would help to blend in something so out of character within this rural environment. I am sure no one could argue they would not be an improvement on this industrial landscape in the heart of Norfolk.

I clearly remember at the first meeting I attended regarding Vanguard, [REDACTED], project manager, said choosing the best location for the substations was an engineering led process and its final positioning was down to economies and ease of connection. Later, [REDACTED] [REDACTED] said we had no influence regarding the actual site (only slight movement within their designated area) so I am concerned that they are withholding necessary mitigation purely for financial reasons.

This is why I became concerned about the applicant's duty of care towards the nearby population as this seemed to be totally overlooked. Vattenfall were totally inflexible, prioritising their profits above the lives of people living nearby, also dismissing Top farm which would be a preferable site, as would be on lower ground and easier to mitigate.

If this infrastructure was further away, we would not be scrutinising this application in such detail so would not have found so many human errors and incorrect assumptions in the way they have conducted their investigations.

[REDACTED], has also flagged up errors in the software used to produce images that project visual impact, producing topographical errors to the point that the applicant appeared to assume there were ridges in the land form, that would help hide the substation!

Please could the planning inspectorate also ask the applicant "Why are they testing the sensitivity of the population?"

I can only assume they are adding this to their application in response to;

"5.2.2 Impact: Community Anxiety and Stress; Public Health England states that large scale industrial projects can result in increased anxiety and stress across communities particularly with respect to the lack of information that is often provided and uncertainties over how they will be affected." (shown in Health Impact Review Method Statement Norfolk Boreas Offshore Wind Farm PB5640-004-009)

Being the largest onshore offshore substation in the world, the applicant cannot totally rule out any incidents, (although all health impacts are deemed low or negligible during construction or operation), but why have any risk to human health at all?

In Table 27.2 The "Outlook" column shows "Presence of groups with strong views or high degrees of uncertainty about the project who may anticipate risks to their health and thus be affected by not only actual changes, but also by the possibility of change." infers that having this outlook is because people are deprived, have high levels of inequalities or inequities or have health problems etc. This is not necessarily true!

I have mentioned table 27.2 in my previous representation, but would like to expand on it as feel it provides an important indicator as to Vattenfall's true regard to the local population.

Are they using this table to legitimise their actions as infer the residents are only anxious because of their ignorance?

At the other extreme, table 27.2 also shows an outlook of "No indication that strong views are held about the project" and adds "People are well informed of the issues and potential effects" which follows on from them having low levels of inequalities and inequities and deprivation etc.!"

I think the applicant is providing misleading comments here, as nearby residents definitely have enough information, many of us look on the PINS website, but we understand what this will mean to our lives during the next decade, and wish to challenge the proposed location.

It is a strange assumption to make, as being well informed about something does not necessarily mean you will agree with it?

Table 27.2 Factors Characterising Population Sensitivity (Cave et al., 2017a)

	Inequalities	Deprivation	Health status	Life stage	Outlook
Higher sensitivity	High levels of inequalities or inequities.	High levels of overall deprivation or a high level of deprivation for a relevant sub-domain of the indices of multiple deprivation. High levels of poor access to financial, social or political resources.	High levels of poor health and/or disability (particularly multiple or complex long-term health conditions). High reliance on (or low capacity in) healthcare facilities, staff or resources.	Presence of dependants (particularly the elderly or children), pregnant women, shift workers or the economically inactive.	Presence of groups with strong views or high degrees of uncertainty about the project who may anticipate risks to their health and thus be affected by not only actual changes, but also by the possibility of change.
Lower sensitivity	Low levels of inequalities or inequities.	Low levels of overall deprivation or a low level of deprivation for a relevant sub-domain of the indices of multiple deprivation. Good access to financial, social or political resources.	Low levels of poor health and/or low levels of disability. Low reliance on (or high capacity in) healthcare facilities, staff or resources.	Predominantly a working age population in steady good quality employment.	No indication that strong views are held about the project. People are well informed of the issues and potential effects.

They also state in 28. “In line with best practice guidance from PHE (PHE, 2017c), health determinants are considered to understand effects of human health and wellbeing. The methodology uses emerging best practice published by the Institute of Environmental Management and Assessment (IEMA) in line with the ‘Health in Environmental Impact Assessment: A Primer for a Proportionate Approach’ (Cave et al., 2017a).”

So accordingly, appropriate research should have emerged, the various impact assessment reports appear thorough, giving extensive methodology e.g. likelihood, significance, magnitude, considering different groups of people, different geographical areas, cumulative effects, but then using table 27.2 makes me question their approach.

I think by using this table shows a prime example of their misinterpretation of facts and condescending nature towards the people who will be directly affected by the substation at Necton.

This also provides a good example of submitting volumes of desk-based data and statistics which are not truly relevant in the context of this actual situation, just because it is backed up by scholarly research, such as table 27.2 above, but does not mean it is correct in these circumstances

This type of generalised information within their application, does not accurately reflect Ivy Todd and Necton, so it is actually the applicant who is lacking in information, not the local residents.

The applicant often uses industry standards, but surely these are more fitting to areas where this sort of infrastructure should be built, i.e. industrialised or urban areas, not quiet rural countryside. All their investigations regarding adverse effects to the population come out as low or negligible, how accurate are these? E.g. Breathing in dust particles is irreversible and not a temporary nuisance to a receptor. Any undetected accidental contamination of the land could enter the food chain or even human food directly as the fields adjacent the substation site, are arable, food producing land.

Thank you

Sincerely, Patricia Lockwood