

From: [NectonSubstationAction Messenger](#)
To: [Norfolk Boreas](#)
Subject: Deadline 5
Date: 07 February 2020 15:44:32

We have two points to make in this representation.

1. This applicant has shown itself to make all decisions based on cost, unless forced to change things despite cost increases by a powerful authority (such as the MOD, MMO Natural England etc)

Being a residential community in Necton, and not a powerful authority, it would seem we just get offered the dregs of whatever is cost-effective.

We believe this has been demonstrated by the applicant's attempts at penny-pinching, corner-cutting and the use of flawed software, a lot of which is aimed at mitigation, both visual, and in regards to other environmental issues such flooding and noise.

We in Necton have been particularly puzzled at their reluctance to create high earth banks to mitigate visuals, just as the authorities have done along the Norwich Northern Distributor Road (NDR).

We have suggested some simple measures that might involve more expense (although we have yet to see a comparison report from the applicant proving this) but they would make the difference between them being totally rejected by us in every way possible, and 'getting away with it', because their presence might at least be tolerable if not welcome. But they refuse point blank. Proper software that doesn't 'invent' land ridges or wildly miscalculate land heights, 15m banks, wired for stability and planted entirely with trees around (east, west and south sides of the substations), the substation levels lowered by 2m, by levelling the sites down to the lowest point instead of up to the highest point, would leave just the tops of the buildings peeking out. These measures would also greatly improve the applicant's chances of coming within the noise restrictions laid down (which at this moment in time seems very unlikely if not impossible). And we have asked ourselves why the applicant is so dead set against these measures.

The reason for that reluctance became apparent at the Accompanied Site Inspection when the applicant's representative was asked why they had chosen the highest point in Necton for their substations and not our preferred lower site on Top Farm. The answer was that the higher site was more level and so wouldn't require as much earth-moving as the lower site. In other words the lower site would cost more. In other words they cannot afford to do it.

We have also suggested wrapping the buildings, using subterranean buildings and green walling, which were all refused, our latest suggestion of high Earth banks/bunds, which

have now also been refused. Low banks (2m) have been considered by the applicant, but would be ineffective with buildings this size. All the applicant has suggested is pockets of sapling hedges, their positions chosen with the help of flawed software, and mostly aimed to the west of the site – ie in attempted mitigation of the view from the A47, which is less than useless to residents. They have in other words offered only the very cheapest, minimum options, to those of us *most* affected.

We feel very strongly that as we will be hosting the biggest offshore, onshore substation in the world if this project and Vanguard are given consent, we should have the very best mitigation that money can buy.

The applicant constantly talks of possible 'compensation'. This is a joke surely? Compensation should involve mitigating this project properly, effectively, and not based on financial decisions. If they can't afford to do that, then they patently will not be able to afford to offer us suitable compensation later, and their claims that they will endeavour to do so must be an attempt at manipulation.

It is our opinion if the applicant cannot afford to do the project properly, they should not be doing it at all, and we hope that the Planning Inspectorate will see fit to refuse the application.

2. It has come to our attention that Breckland Council will apparently be getting a huge income stream from the project due to this:

<file:///C:/Users/User/Documents/Necton/Tax%20retention.pdf>

which says: *7.10 The Coalition Agreement included a commitment to “allow communities that host renewable energy projects to keep the additional business rates they generate.” To deliver upon this commitment the Government will provide that when calculating how much rates income in a local authority area is to be shared between local government and central government, it will disregard the rating income from new renewable energy projects. This will then allow the income from such projects to be retained 100% by local government. Necton, the 'host' of the projects will not get any of this income.*

Could it be possible that District Councils are being encouraged to accept renewable projects by the use of financial rewards?

Is it also possible that therefore there might be a conflict of interest in the supporting of these projects by District Councils, so as to not risk the financial payoff?

Could it be that the District Councils might not support a community that does not feel such a project is suitable in their area so as not to risk the financial payoff?

We feel that these are questions that should be answered.

NSAG

From: [NectonSubstationAction Messenger](#)
To: [Norfolk Boreas](#)
Subject: Re: Deadline 5
Date: 09 February 2020 11:35:56

Additional - link given for pdf might not work, so this is the correct link. Thank you.

http://www.legislation.gov.uk/uksi/2013/108/pdfs/uksiem_20130108_en.pdf

EXPLANATORY MEMORANDUM TO THE NON-DOMESTIC
RATING (RENEWABLE ENERGY PROJECTS) REGULATIONS
2013 No. 108 - Legislation.gov.uk

7.6 In any year, the amount of non-domestic rates income to be disregarded in a designated area is found under Part 1 of Schedule 2 by calculating the non-domestic rating income for the area for the year and

www.legislation.gov.uk

From: [NectonSubstationAction_Messenger](#)
To: [Norfolk Boreas](#)
Subject: Deadline 5
Date: 11 February 2020 14:28:38

We understood that if both projects went ahead (ie Scenario 1) the NG extensions would go east and west and that is what diagrams show. This seems to have changed to them both going East if both go ahead.

Could the applicant explain this apparent change please as it makes a great deal of difference to receptors concerning the visual aspects.

The Applicant explained that Work No 10A refers to the extension to the existing Necton National Grid substation, which under Scenario 1 would be in an easterly direction and under Scenario 2 would be in a westerly direction.

[https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010087/EN010087-001588-Written%20Summary%20of%20the%20Applicant's%20Oral%20Case%20at%20Issue%20Specific%20Hearing%203%20\(Onshore\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010087/EN010087-001588-Written%20Summary%20of%20the%20Applicant's%20Oral%20Case%20at%20Issue%20Specific%20Hearing%203%20(Onshore).pdf)

NSAG

From: [NectonSubstationAction Messenger](#)
To: [Norfolk Boreas](#)
Subject: Deadline 5
Date: 18 February 2020 15:56:07

Dear Planning Inspectorate

During the ISH on 21st January 2020, the Applicant stated that at an ETG meeting it was stated by 'someone' that, they did not want earth bunding used at Necton to screen the substations, because they would not be in character with the landscape. (not verbatim).

We have since managed to first discover what an ETG meeting was as we had no idea, and have tried to get from Breckland Council and the Applicant the minutes of the relevant meeting to discover who in fact stated this.

It is extremely important in our opinion, because it goes to the heart of the Applicant's campaign not to use bunds, and has been used ever since it was made (if it was made) by them to excuse refusing to consider bunds of any useful size. We want to know who said it, and we will then challenge the remark.

We do not feel it is right that the Applicant should state such a thing as evidence, and yet not be asked to prove it.

To this end we are still awaiting responses at today's date.

We have discovered the ETG Meetings that took place and believe the Applicant's statement can only be from this meeting:

24th January 2018

Landscape and Visual Impacts ETG meeting - PEI Responses

Breckland Council, Broadland District Council, Norfolk Coast Partnership and North Norfolk District Council

Norfolk Vanguard PEIR comments and approach to updating assessments (minutes provided in Appendix 9.31).

These may be the minutes we request to see.

Norfolk Boreas Offshore Wind Farm Consultation Report Appendix 9.31 Norfolk Vanguard Landscape and Visual Impact and Land Use minutes

This contains confidential information. Therefore this document is only available on request to those who have a legitimate need to view the information.

As you can see these minutes have been redacted.

We would ask the Inspectors if they could ask the Applicant what their grounds are for redacting these minutes and then using a statement they claim was made at it as evidence, when the rest of us cannot see it.

We would also ask the Inspector to ask the Applicant to provide us with the unredacted minutes so that we may see who made this comment.

We have heard from Breckland Council's representative Jon Berry today that he does not recall attending any such meeting, and denied even knowing what an ETG Meeting was, so we are unable to ascertain if anyone from Breckland made the comment. As you can see from the above they were in attendance. He also claims not to have said the comment.

Jon Berry has said he can't answer any more questions and that we have to wait until he has handed the job over to Simon Wood on Thursday this week. We do not find this satisfactory.

We are left in a state of uncertainty and helplessness so we ask the ExA to help us by getting access to the information that we do not seem to be able to get.

If it turns out that the ExA redacted the minutes above, could they please tell us who if anyone made the comment and in what context? If no-one made the comment, could they ask the Applicant when it was made, as they keep quoting it, and by whom?

NSAG

From: [NectonSubstationAction_Messenger](#)
To: [Norfolk Boreas](#)
Subject: Discrepancy Deadline 5
Date: 21 February 2020 14:16:31

Dear Planning Inspectorate

This is a follow on to a previous email we sent - with further information.

This is a direct quote from: [https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010087/EN010087-001588-Written%20Summary%20of%20the%20Applicant's%20Oral%20Case%20at%20Issue%20Specific%20Hearing%203%20\(Onshore\).pdf?fbclid=IwAR03bP2mWIYPVsUT_pnpRLw8RxovZaxrwfuqL0xvXWiomrOj2fGze_ulxjs](https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010087/EN010087-001588-Written%20Summary%20of%20the%20Applicant's%20Oral%20Case%20at%20Issue%20Specific%20Hearing%203%20(Onshore).pdf?fbclid=IwAR03bP2mWIYPVsUT_pnpRLw8RxovZaxrwfuqL0xvXWiomrOj2fGze_ulxjs)

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]).

Looking through both tracked and clean versions of the OLEMS (Section 6.5.1.1 and 6.5.2.1 of OLEMS [REP1-020]). this cannot be found.


So, it would appear this quote is incorrect or missing. This quote has been used by the applicant many times as justification for them refusing to use earth bunds as Necton wishes them to.



If the quote is untrue and the 'consultees' did not say it, then we feel it cannot be used as justification or evidence.

Neither can the applicant's assertion at the ISH that bunds had an issue with stability, as earth bunds of great heights have been used locally. The attached shows banks on the NDR and some other forms of bunds used to hide or block noise. Therefore their only reason for not using bunds must be financially based.

NSAG

Ipswich (A11)
Thetford (A11)

Norwich N
& central 
Cromer
A140



13







50 yds

STOP

From: [NectonSubstationAction Messenger](#)
To: [Norfolk Boreas](#)
Subject: Alternative Site - Top Farm Deadline 5
Date: 04 February 2020 08:52:50

Dear Planning Inspectorate

Following the Accompanied Site Visit on 23rd January 2019, in Necton, a few points have come to light.

1) We agree totally with Necton Parish Council who state that the applicant is quite wrong when it says:

“The area to the north-west of the site was discounted owing to the location of a water course through this area and the steep valley sides leading down to it. The area to the north, towards Top Farm, was also reviewed as an alternative site. In terms of landform, this site is higher than the proposed site, with a range of 65m to 75m as opposed to 65m to 70m. It is also on more steeply sloping landform and without the levelling off that occurs around the proposed site, it would potentially be more visible from the surrounding landscape. Furthermore, it would also bring a new development closer to the heavily trafficked A47.

3. OS maps show that the landform to the north and north-east of the onshore project substation rises. It is, therefore, simply not possible for a site to the north to be on lower-lying ground. The proposed site is situated between the existing contours of 65m and 70m AOD. Land towards Top Farm, to the north, is situated between the contours of 65m and 75m AOD. The land to the north- west, however, falls away to 60m to 65m AOD which would be lower-lying but then the site would be in the valley of the un-named river and potentially covering its course, giving rise to issues of large scale earthworks required to accommodate a large level site and issues of culverting the water course in an area which is already prone to flooding. “

Mr Allhusen (the owner of Bradenham Hall Farms), Mr Hill (the owner of Top Farm), Mr Colin King (the owner of Ivy Todd Farm) , all of whom have lived and worked the land for over 50 years, have all agreed with our Parish Council on their findings with regard to the applicant's land height inaccuracies, but have been dismissed and ignored by the applicant.

The only reason for this is seems to be that the applicant is deliberately making wrong assumptions based on desk-based research favouring the cheapest possible course of action, and that which is most convenient to them, leaving us to suffer the consequences for the rest of our lives in Necton, with regard to substation siting.

To clarify, the applicant keeps quoting the height of Top Farm as being where the house sits. Top Farm's land slips away and down from the house to the low-lying land that was walked on during the site visit.

It seems that the applicant is really not applying any common sense to this issue at all. Savings they would make on a very much shorter access road, and savings on 400kv cabling all the way from their chosen substations' site to the National Grid connection with the transformed/converted energy, would surely compensate for earth moving, (which would in turn create earth which could be used to create earth banks to hide the buildings). No soil would need to be removed from the site.

If the substations were build in the actual low-lying ground of Top Farm, the rise from there up to the A47, with it's existing mature hedges along its edge, would also help hide the converter halls from the A47.

In any case it fills the residents on Necton and surrounding villages with utter fury that more consideration is given to transient, passing traffic on the A47, when no care at all is given to residents who will live with and see the substations 24/7 for the life of the project.

Drivers on the A47 travelling at 50 mph at that point, will see the substations to varying degrees on the applicant's chosen site, or on the Top Farm site, as they will also see the 1/3 of a mile stretch of National Grid Infrastructure. But it will be a fleeting glance and moving the substations to lower ground (ie Top Farm) will hardly change that fleeting perception.

No wonder then that the residents of Necton and surrounding villages feel not only ignored, but almost as if they are being deliberately persecuted by the applicants intransigence with regard to res-siting and/or using HIGH earth banks. We are sorry if this language appears vexatious to the Planning Authority, but it is just honesty.

Also it has become apparent that not content with ruining 2 farms at Necton (Top Farm with the access road cutting through it) and Necton Farm (with the substations and National Grid Extensions), but the visit has highlighted the previously unknown fact that they are also going onto Bradenham Hall Farms with a corner of the compound, about which the landowner apparently knows nothing. So a third farm will be damaged.

Is it really beyond the capability of the applicant to fit their entire 2 substations into one farm's area without pushing one corner into another farm? This crossing of boundaries will of course also entail further hedge removal (between Bradenham Hall and Necton Farm), which is utterly disgraceful.

It appears to us that the applicant is trying to inflict as much damage as they can, and all of it seems to be in the name of cutting costs or ineptitude.

Another point that is made by the applicant in their determination not to use Top Farm for the substations, is that they will have to cross the little stream.

1. We do not see why as there seems to be plenty of room, IF good design is used to fit

both substations in Top Farm.

2. The stream, as it stands will already have to be crossed by the access road in any case.

Thank you

NSAG

From: [NectonSubstationAction_Messenger](#)
To: [Norfolk Boreas](#)
Subject: Environment Topic Group Meetings
Date: 12 February 2020 08:29:34

Dear Planning Inspectorate

In answer to our queries about bunds at the ISH, the applicant has stated in the [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/FN010087/FN010087-001588-Written%20Summary%20of%20the%20Applicant's%20Oral%20Case%20at%20Issue%20Specific%20Hearing%203%20\(Onshore\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/FN010087/FN010087-001588-Written%20Summary%20of%20the%20Applicant's%20Oral%20Case%20at%20Issue%20Specific%20Hearing%203%20(Onshore).pdf)

"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]."

We queried this with Breckland Council and got the following reply from Jon Berry on 11th Feb 2020.

"I am not sure either what is being referred to by "Environment Topic Group Meetings". I will ask Vattenfall when Officers of the Council meet with them tomorrow afternoon."

We wanted to bring this to the Planning Inspectors notice as it appears the applicant may be mistaken.

We would like to ask the Planning Inspector to ask the applicant to confirm this statement as true, and also to explain who attended these ***Environment Topic Group Meetings.***

We would like to see a copy of the minutes (under the freedom of information act), so that we may ascertain who said that large bunds would appear incongruous and possibly challenge them.

We know it was not our Parish Council and Jon Berry denies it, so who was it?

It does not seem likely that NCC would have said it as they have used large bunds extensively in the local area and along the NDR.

This is not a trivial matter because it goes to the heart of the applicant's excuses not to use earth bunds. If their only excuse is that 'someone' said they weren't suitable, at a meeting that Breckland does not recall, then surely they must be asked to reconsider large earth banks.

We do not understand why something so vital to help residents accept their fate at the hands of the applicant is being so ardently refused by the applicant. It would seem nonsensical.

NSAG