

**From:** [REDACTED]  
**To:** [Norfolk Boreas](#)  
**Subject:** Norfolk Boreas Project EN010087  
**Date:** 26 March 2020 21:08:49

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Dear Planning Inspectorate,

I would like to respond to the applicants comments to my deadline 5 submission. The comments regarding the baseline noise survey explains the repeatable representative background sound level of 28.4dBA was selected as appropriate for receptor SSR2, (which represents Ivy Todd) as it was slightly lower than arithmetic average of 28.4dBA. (actually the same) West End Bradenham, if it had been monitored, would have been equally as low if not lower, and yet they explain the operating substation noise level shall not exceed 35dB 5 minutes or 32dB 15 minutes adjacent to any noise sensitive location. The applicant reinforces this decision by explaining that at ETG meetings, with the Environmental Health Officer at Breckland Council, it was identified that the noise emissions from the operational project substation must not exceed the permitted noise levels of the existing Dudgeon substation, (35dB 5 minutes, 32dB 15 minutes).

The major over site here, which survived the best considerations at the ETG meetings, is the Dudgeon noise limit was based on its nearest noise sensitive receptor, a property less than 20m from the A47 road, with a high baseline background noise, resulting the 32-35dB limit. There are no similarities between the quietness of the hamlets of Ivy Todd, West End Bradenham, and the property just meters from the A47.

In my submission I drew attention to 768 acres of land being covered in noise above 32dB, and how this amount of sound energy would be vulnerable to accidentally traveling beyond the 750m radius limit, (the nearest noise sensitive receptor). This was not commented on by the applicant. This I believe is referred to as noise creep.

Planning Noise Advice Document Sussex 2.2 Guidelines And Criteria 2.2.1. BS41442:2014.

Page 11. states the noise limit should be set at the background noise level, or up to 10 dB below for specific sites, where a rating level below background is deemed appropriate, or noise creep could be a problem. I consider the quiet and tranquil nature of Ivy Todd and West End Bradenham demands a noise limit under the background level, not over, when compared to more normal urban or industrial areas for this type of development, even without the possible noise creep situation. <https://www.adur-worthing.gov.uk/media/media.121802.en.pdf>

I feel in general, the response to my concerns, regarding the baseline noise survey, was: every part of the process was considered by Breckland Council, and agreed.

Regarding landscape and visual effects, the applicant explains the visualisations are prepared to SNH standards, which suggests the visualisations provided for this project, would normally be adequate. To me this means normally a site selected for a project of this size would be more remote and removed from hamlets and villages, so far, that whether the infrastructure was 3/4 in view, or fully concealed, would make no difference. The other possibility is normally the infrastructure in projects of this type, positioned in a similarly sensitive area, is less substantial, so whether it's fully visible, or concealed, is of no consequence.

The applicant states the SNH guidelines page22. Visualisations should provide a representation of the proposal, that is accurate enough for the potential impacts to be fully understood. I question whether this has been achieved.

The applicant states the SNH guidelines go on to add, "it is important to stress that visualisations represent just one source of information that forms the LVIA." As far as I am aware, all visual impacts are assessed with the visualisations. There is mention of observations in the field, but no information is provided from these observations, and any information gained from these observations failed to correct the major inaccuracies at

viewpoints 3 and 7.

The explanation of how the photo montages are produced, describes how the substation buildings and infrastructure is generated, and placed, not by vectors and vertices, but by human consideration, with great care, and many on going verifications. This system failed to work satisfactorily for viewpoints 3 and 7, at least.

My other concerns that have not gained a response, I take cannot be answered, or the applicant prefers not to comment.

Thank You For Your Attention    Colin King.    20022983.