

From: [REDACTED]
To: [Norfolk Boreas](#)
Subject: Norfolk Boreas Project EN010087.
Date: 29 April 2020 21:51:08

Dear Planning Inspectorate,

The applicant refers to their Outline Landscape and Ecological Management Strategy 8.7 4. Embedded Mitigation.

Regarding the National Grid Substation extension site selection, the applicant suggests in accordance with the Horlocks Rules, it is an advantage to develop adjacent to existing constructions, eg. building the National Grid connection point onto the existing substation and connection to contain these developments within a localised area, and in doing so would contain the extent of the landscape and visual effects. This has some merit, but as an infrastructure site grows with additional developments, a revaluation of the mitigation methods is needed. Initially a 20 acre substation may be adequately mitigated with hedges and young trees, but as it grows to 70 acres plus, with buildings 19m high, it cannot be considered adequate to simply extend the same hedges and young trees to mitigate the new infrastructure of totally different scale and character. As the development grows in scale its visual impact multiplies, and new techniques of mitigation are needed.

The 2 woods mentioned would only screen a limited number of viewpoints from Little Fransham and Bradenham Hall area of Bradenham. As the substation site is 70m above sea level, 19m tall buildings would be visible above the tree line. The opinion of the applicant that existing woods can successfully screen 19m high buildings, built on a 70m high Plato, and also showing the same effect with planted mitigation trees in photo montages, (view point 7) is a concern.

The on shore cable route site selection is still questionable. More direct routes could have been secured, if Vanguard/Boreas went to Swardesden, and Hornsea 3 went to Necton. Even if the same cable routes were used, and the destinations changed from where they cross, a mile could be saved. This as a starting point could be improved further.

Commitment to HVDC technology obviously had a major detrimental effect on the substation height, with no adjustment to mitigation. The same mitigation cannot be suitable for both methods. If it is adequate for HVDC, then it would be excessive for HVAC, and visa versa.

In the applicants Comments on Responses To The third Round of Written Questions 9.6 Good Design, the applicants comment states:

"The Design and Access Statement is to provide details of the use, layout, scale and appearance of the onshore project substation to assist in seeking approvals under Requirement 16. The Design Guide will present details of landscaping and provide a means by which the local authority and stakeholders can provide feedback, which will be considered for the final landscaping scheme. The Design Guide as indicated will also assist in seeking approvals under Requirement 18(2)(j), and reference to this will be added to the aims of the Design Guide. • A statement regarding Scenario 1 and Scenario 2, and potential cumulative effects with Norfolk Vanguard will be added. • The defined 'existing ground level', as secured in Requirement 16 of the dDCO, has been determined from a neutral cut and fill assessment of the onshore project substation footprint and therefore represents the median level. Furthermore, the Design Guide approach as outlined in the DAS includes the following wording, 'The options proposed will ensure that the onshore project substation is sensitive to place, with visual impacts minimised as far as practical by the use of appropriate design, planting and modifications to landscape topology and hydrology'. • The above secured aspects provide the necessary flexibility in the final design whilst acknowledging the principles of the ground level approach and the need for sensitivity in the landscape topology. To provide a statement which stringently limits the cut and fill to an existing midpoint only, prior to detailed design, would not be appropriate

because it would limit any ability, for example, to potentially lower the ground level below the existing midpoint, however marginally, should overall cut material be made available for on-site landscaping/bunding." •

Whether the substation is bunded, and to what degree, and whether the construction is to be lowered, and to what degree are fundamentals, not details and must be specified to comply at all with the criteria of a Design and Access Statement, as above. These decisions if left to post consent makes a mockery of all visual impact work.

I noticed that Breckland Council did not answer the 3 questions the ExA asked in their Third Round of Written Questions. Q.3.9.7.

I feel Breckland Council has shown little local knowledge of the topography, businesses, or shown any independent work, and should have been represented at the accompanied site inspections. I am therefore concerned about being represented in any post consent decisions, especially as they mentioned they are under no obligation to work with Necton Parish Council, so I assume this applies to residents.

I find the process has not shaped the substation project in any way. The applicant works hard to make the project work on paper, without actually changing anything.

Thank You For Your Attention

Colin King

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