

# Necton Parish Council (EN010079) Response to Additional Boreas Questions ExQ4, 28 April 2020

## Additional Question: Q4:9.2.1

### **The decision to use HVDC over HVAC transmission technology:**

Necton Parish Council considers it was not involved in the consultations regarding the decision to use HVDC for the Proposed Development [REP8-030]. There have also been representations which seem to indicate that consultation was not clearly undertaken for the Proposed Development, that it was only mentioned at consultation events thought to be focussed on the proposed Norfolk Vanguard OWF [REP7-058], and the local MP for Mid Norfolk considers that the true scale of the proposals were not explained sufficiently to locals [RR-042].

The Consultation Report states that Parish Councils were appropriately briefed to feed into the Works Plans [APP-027, para 52], the pros and cons of HVAC and HVDC were communicated and illustrations of HVAC and HVDC options for the substations were presented [APP-027, Table 17.2 page 143] and [APP-094, page 8b] and a handful of people preferred HVAC with one reason being because the visual impact of the substations would be greater [APP-027, para 182]. A further workshop overview event was arranged for Necton [APP-027, Section 14.3].

- a) It is clear that Necton Parish Council was invited to the Necton Substation Workshop overview event on 19 July 2017 [APP-131], but was it invited to the earlier event where the illustrations of the HVAC and HVDC options for the substations were displayed?
- b) Did Necton PC attend that earlier event?
- c) When did that event take place?
- d) Were the pros and cons of HVDC and HVAC communicated at that earlier event?
- e) Was that earlier event for the purpose of consulting on Norfolk Vanguard OWF, the Proposed Development, or both?
- f) The July 2017 Necton Substation Workshop presentations [APP-132] show visualisations for HVAC and HVDC. However, some attendees eg NSAG don't seem to be aware that was the case [REP3-025] and [REP3-030, comment on response to Q9.4.1]. Were the differences in substation dimensions relating to the different transmission technologies explained at the workshop?
- g) Was the Necton Substation Workshop for the purpose of consulting on Norfolk Vanguard OWF, the Proposed Development, or both?
- h) Did the Necton Substation Workshop overview event consult specifically on the Proposed Development?
- i) Had the decision been taken by this stage to use HVDC technology for the Proposed Development?
- j) Why do you think the feedback from that July 2017 workshop does not mention the effects of HVAC or HVDC [APP-133]?
- k) Was Scenario 2 consulted upon [REP4-052]?
- l) How will you ensure effective and constructive engagement and consultation over the design process and Design Guide, which ensure transparency?
- m) Include words in the DAS that set out a protocol to cover this.

In point f) the Examining Authority (ExA) states 'NSAG don't seem to be aware' of the difference in substation dimensions relating to the different technologies. None of the Necton Parish Councillors were aware of the significant difference in substation dimensions either. If the applicant had illustrated this difference in dimensions of the HVDC versus HVAC substations in a way that could be understood during their consultation at any point, there would have been many comments from interested persons from the area of Necton and these don't seem to be available. The decision to use AC versus DC transmission technology was presented as a decision that was the province of Vattenfall only and was not a subject for discussion. It was presented as a decision that was driven by the available technology and any effect on the infrastructure at Necton would be minimal. As the ExA has become aware of the high level of concern from Necton residents during the examination process, the ExA will probably have been expecting that the consultation process would have highlighted this as a significant issue.

Had any information been available during the consultation process to Necton Parish Council (NPC), NSAG and other interested persons, you can be sure they would not have been shy in giving their views to Vattenfall! This is just one example that supports statements from NSAG and NPC who together represent the views of a large cross section of Necton residents, that the public consultation in Necton was not complete or adequate and did not use accurate information.

### **Additional Question: Q4:9.2.3**

#### **Top Farm location, Scenario 1:**

*All those who consider Top Farm to be a more suitable location for the onshore project substation for the Proposed Development are asked whether they would retain that opinion if the SoS were to consent the Norfolk Vanguard OFW, with its onshore project substation on the site indicated for the Proposed Development's Scenario 1, as shown on Norfolk Boreas drawings eg [REP7-019, Figure 1b].*

Since the same information was made available to both examining authorities (ExAs) and the accompanied site visits of both ExAs included Top Farm, the conclusions reached by both ExAs ought to be the same. If that's not the case, the Secretary of State has the final say and one would hope that he will apply sense to the decision and ensure a single location is selected. If all that fails, Necton Parish Council (NPC) would prefer as much as possible of the huge infrastructure to be placed as low as possible in the landscape. Top Farm is therefore the preferred location for Boreas whatever recommendation is made by the ExA for Vanguard. In addition, NPC would ask that if the ExAs come to different conclusions, an internal investigation be undertaken to understand why the Vanguard ExA did not reach the same conclusion as the Boreas ExA given that the same information was available to both ExAs.

### **Additional Question: Q4:9.6.4**

#### **Design and Access Statement (DAS) and Outline Landscape and Ecological Management Strategy (OLEMS) – comments requested:**

*This question supersedes ExQ3.9.6.5.*

*The ExA acknowledges your Deadline 8 representation [REP8-030] and has asked further questions of the Applicant. However, should the Secretary of State be minded to consent the Proposed Development, it would use HVDC transmission technology [AS-024, Table 26, No. 84].*

*You ask for Requirements to be tied to the DCO to achieve effective mitigation.*

- a) The ExA is aware of your views on bunding. Is there anything else specifically you consider should be included in Requirements to achieve the effective mitigation to which you refer? If so, provide details.*
- b) The DAS is secured by DCO Requirement 16(4) and sets out the process for and commitment to the preparation of a Design Guide for the proposed onshore project substation. Necton PC is now listed as one to be consulted during the design process for the onshore project substation. The ExA urges you to provide any comments and/ or any further points you consider should be included or amended to the updated DAS submitted at Deadline 7 [REP7-006] to [REP7-010].*
- c) The OLEMS is secured by Requirement 18. The Applicant submitted an updated version at Deadline 8 [REP8-006]. Provide any comments and/ or any further points you consider should be included or amended to the OLEMS.*

- a) A contribution to effective mitigation can also be made by specifying a lower ground level (datum) for the installations. NPC would like the ground level datums for the National Grid extensions and Converter halls to be set as follows:

#### **National Grid extensions:**

- 62 metres for the south east extension. Alternatively, the installation can follow the slope of the ground but cannot exceed 13 metres above ground level at any point.
- The north west extension to use the same datum level as the Dudgeon substation.

The height of the National Grid extensions to be limited to 13 metres above the applicable datum level.

**Converter halls** datum level to be set at the 65 metre contour line. All buildings higher than 13 metres above the datum should be sunk into the ground such that their height above the datum does not exceed 13 metres.

- b) Further items to be included in the DAS.

**In REP7-006** Design principles for the onshore substation and national grid substation:

On page 16, paragraph 41: NPC would like additions: 'The masts on the converter halls will be made of non-reflective materials' and 'The National Grid exterior equipment and exposed wiring will have a non-reflective finish to avoid shining in the sun'.

On page 16, paragraph 42: NPC would like an addition: 'The landscape planting will be of saplings at least 2 metres in height' and 'Additional tree planting will be done to shield vulnerable viewpoints selected in consultation with local interested parties' and "Gaps in shielding planting will be closed so far as is reasonably practicable through the use of staggered or other planting options'.

On page 20, paragraph 60: NPC would like an addition: 'To screen the new installation, a 10-metre-high earth bank will be placed along the 65-metre contour line between Necton and the substations. The bank will run between 20 metres away from the A47 and the sugar beet pad track on Necton Farm that runs from Ivy Tod road and is marked as a double dotted line on the ordinance survey map. This earth bank to be planted with trees.'

NPC welcome the local input into the converter hall colour preference already included in paragraphs 70, 74, 76, pages 22–24 and in the section Outline for The Norfolk Boreas Design Guide principles on pages 33-4

On page 26, paragraph 89: NPC would like an addition: 'The exterior lighting installed will be of a type that illuminates in a downward direction only'.

On page 26, paragraph 92: NPC would like an addition 'Earth banks 15 metres in height will be built around the complete outer circumference of the converter halls compound and planted with trees' and 'These trees will have an additional 5 years of aftercare making 10 years in total because of the challenging growing conditions on the artificial banks'.

c) Further OLEM points

On page 6 of document **REP8-006** it states that 'replacement planting after the 5-year aftercare period would be at the discretion of Norfolk County Council'. Could this be changed to at the discretion of Necton Parish Council or Breckland Council?

**Additional Question: Q4:16.0.4**

***Effects on local community:***

*Interested Parties are invited to submit any additional information to assist the ExA in reaching its recommendation to the SoS not covered previously in the Examination, or in the responses provided above.*

The Corona virus pandemic controls are forecast to diminish the UK output by 6% going forward. The finances of both the UK and Vattenfall/their suppliers will be less robust in the future. The near-shore loop connections recommended by OFGEM and National Grid are scheduled to give the UK a 5% saving in the cost of electricity but the more projects that use point-to-point wiring across the countryside to individual substations will each diminish the amount of this saving. The cost of joining the near-shore loops is forecast to be lower than the point-to-point wiring designed to join Boreas into the National Grid at Necton. The Secretary of State could be minded to delay the current batch of DCOs to save money for both the UK and the Applicants in these difficult financial times through the use of the future connection strategy recommended by both OFGEM and the National Grid.

**Necton Parish Council**

2 May 2020