

Boreas Open Floor Hearing 2 July 2020 Briefing Notes

The Open Floor Hearing is planned to be held virtually on 2 July 2020 at 14.00.

My name is Fraser Bateman and I am the vice-chairman of Necton Parish Council. I would like to cover three points today. We are aware of the Secretary of State's very recent perverse decision to approve Vanguard despite the ExA's recommendation to refuse but we still consider these points to be valid.

Firstly, An Integrated Approach to Connecting Wind Energy into the National Grid

National Grid and associated stakeholders (including the applicant for this project) have been investigating the economies of connecting wind energy into the National Grid for some years, culminating in a report written in 2015 (Integrated Offshore Transmission Project (East)) recommending an integrated approach that moves completely away from point-to-point or radial connections such as that applied for here to an integrated transmission solution that will be cheaper, more efficient and less damaging to the environment. It has been recognised in parliament that a different regulatory framework is required and the three East Anglian Members of Parliament affected by wind farm connections into the National Grid are tirelessly working to make these regulatory changes happen quickly. An integrated wind farm connection approach is already being used in other European countries. The Boreas DCO presents an unnecessary and unacceptable level of damage both to the environment and rural infrastructure.

In addition, the crossing of the cable corridors for Hornsea 3 and Boreas / Vanguard is something that anyone looking at a map can see is inefficient in terms of cable being used and farmland disrupted. Many kilometres could be saved if the connection points were swapped. This is something that only the Secretary of State can change because the current policies of National Grid have been followed to the letter and lead directly to the connection points allocated to these projects.

We ask that this project be refused until an acceptable connection strategy into the National Grid is proposed, either by swapping the Boreas and Hornsea 3 connection points or using the integrated connection strategy that will be enshrined shortly in a new regulatory framework.

Secondly Infrastructure Built into Rural Areas

The effects on visual amenity of infrastructure on the unprecedented scale being considered here, is very difficult to imagine. Trying to think of the Wembley Stadium placed in a field around Necton is not an easy thing. Putting four of them (like the Boreas and Vanguard converter halls) on top of a nearby hill is just unimaginable. We are unable to see in our mind's eye four Wembley Stadiums towering above the trees less than a kilometre away from the houses in Ivy Todd. Therefore, we rely on measurements and floor areas. Our imagination is helped by visualisations, which in this case are photomontages, presented by the applicant. Unfortunately, the software they have used has certain inadequacies - like the accuracy of the ground level and a foreshortened view of the structures, that could be considered misleading if taken as in any way accurate. The impact of national infrastructure on a rural community can be minimal if done properly or immense if not. The applicant has rejected the option of putting the converter halls on an available field 8 to 10 metres lower

than the one proposed in the application being considered here. The applicant has been asked and refused to build sufficiently high earth banks, planted with trees, around the infrastructure to mask it from view. There are many possible remote connection points along the pylon line that could have been offered to the applicant by National Grid but were not because they do not comply with the policies that National Grid must follow. All these are reasons why Necton are faced with a change in their surroundings that could be minimised or completely avoided but is not. Necton Parish Council represent the rural community residents of Necton, and ask that the examining authority do not accept the decisions that have led to a proposal which could be made acceptable to the community but in its present form is not.

Necton Parish Council recognise that the planning authority that will agree the conditions for building the infrastructure is Breckland Council. Indications from the statement of common ground between the applicant and Breckland Council are that no visual conditions will be placed on the applicant. Necton Parish Council therefore request the Examining Authority to impose mitigation restrictions in the Design Statement that do not leave Necton Parish Council as merely a consultee in a process that is so important to the village. Planning decisions can be made by Breckland with reference to, but no weight given to, the views of the village concerned - even when they are consultees - because Breckland must consider the benefits to the whole of Breckland first. Only the Examining Authority has the power in this case to **absolutely ensure** that there is adequate mitigation of this huge infrastructure through clear conditions placed on the applicant. We request that you do so.

And Thirdly Compensation

The Applicant has assured the Examining Authority that there will be a compensation scheme associated with Boreas. It will be independently run and will provide an ongoing benefit for those affected, including Necton. Necton Parish Council would prefer that the money supposedly allocated to compensate Necton in the future is spent up-front on effective mitigation. Necton currently host the Dudgeon substation, an AC wind farm connection into the National Grid. So we have some experience of construction and operation of infrastructure such as that being examined here. A compensation package was offered with the Dudgeon substation. Five years on and the cable trenches are returning to arable land, the wind turbines are operating off-shore, and there have been additional jobs created at the coastal command centre where the unmanned Dudgeon substation is controlled. The infrastructure is left at Necton, visible for miles. Breckland have the benefit of council tax retained in its entirety through the generosity of the government. The intention of this generosity could be for an on-going benefit to the local area who host the infrastructure on their doorstep. This has not happened in the case of the Dudgeon substation. There is no on-going compensation for Necton from either the Dudgeon wind farm project or Breckland Council.

If the Boreas DCO is approved and effective mitigation is not mandated in the DCO conditions, Necton Parish Council request that a separate compensation fund is set up purely for mitigation of the project at Necton. That no other area will be given access to the funding. In this way there will be a defined benefit for Necton who will host the huge substations for the lifetime of the wind farm.

Thank you

Boreas Open Floor Hearing 2 July 2020 Representation

The following representation was given by a member of Necton Parish Council in their own right because there had been insufficient time (24 hours) to gain the support of the Parish Council in advance. Necton Parish Council has subsequently adopted the representation and no changes were made to the content.

Necton Parish Council have read the 44 page letter sent to Ruari Lean of Vattenfall on 1 July containing the decision of the Secretary of State granting the Vanguard DCO and have also seen the 376 page report from the Examining Authority. Some points pertinent to this examination occurred to us.

In paragraph 4.29 the letter states: “The ExA’s overall conclusion for Necton and Ivy Todd is that there would be no significant impacts on the views of residents in those villages.”

The accompanied site inspections for both the Vanguard and Boreas examining authorities, relied heavily on the visualisations produced by the applicant. In both cases the pictures produced by the applicant were compared to the trees and other features in the landscape to determine what will be seen. Data has been supplied to this Examining Authority by Colin King showing that the photomontages used are not accurate and that the impact of the substations will be much greater than has been declared by the applicant. In section 4.5.111 of the Vanguard Examining authority, report the conclusion is “there will be significant localised effects around the substation works which would be ameliorated over time and which would relate to a small part of the overall landscape character area.”

The Boreas DCO seeks to double the number of converter halls that will be built by Vanguard. The cumulative impact will be much higher with four converter halls than with two. In addition, the applicant seeks to keep Boreas on the same ground level as Vanguard thus Boreas will effectively be built out above the sloping away ground making it even more visible.

In paragraph 4.48 the Secretary of State decision letter states: “In concluding its assessment of the impacts of the proposed development on landscape character, the ExA considers with mitigation measures enacted, there would be significant local effects in the vicinity of the onshore substations that would lessen over time and affect only a small part of the overall landscape character area.”

The effects of Vanguard have already been understated by the applicant. With the addition of the Boreas infrastructure the landscape character will be further changed. Adequate mitigation is possible and we ask why this is not already part of the DCO. We have merely asked for earth banks similar to those provided alongside the Northern Distributor Road around Norwich. This is not rocket science and also not expensive in terms of National infrastructure.

In paragraph 8.4 under Other Matters the letter states: “A member of the public wrote to suggest that the Secretary of State should seek to move the site of the Necton substation to a new site in the vicinity to lower its visual impact. However, the proposed location would need to be subject to a new application for consent (as it does not form part of the application submitted by the applicant) and the ExA considered that the locations of the

substations proposed by the applicant were acceptable (while acknowledging that there would be localised visual impacts). In this situation the Secretary of State does not believe that there is any need to consider an alternative location where an existing proposal is acceptable.” The question here is acceptable to who? The alternative location has been raised throughout the consultation process and has not just cropped up as an afterthought. It was deliberately ignored by the applicant.

In paragraph 7.4 the letter states: “on balance the benefits of the proposed development outweigh its adverse impacts”

In weighing the harm which in this case is a change in visual amenity at Necton against the benefit to the UK of wind energy, it's obvious that wind energy is always going to be more important. However, if there's an option that removes the harm then the question is actually one of reasonable practicality. Is it reasonably practicable to put earth banks around the converter halls? Is it reasonably practicable to move the huge buildings to a lower-lying adjacent field? There should be no question of a balancing decision on harm versus good in this case, just an economic decision as to whether the project should pay to hide the huge buildings it wants to build in a rural area where they will be completely out of character or whether the application should be re-submitted with the converter halls moved to an acceptable, if not a welcome, position.

An acceptable sacrifice is what the Secretary of State has decided to accept. The question we ask is why **any** sacrifice is being accepted when **no** sacrifice is actually necessary.

Necton Parish Council.