

From: [REDACTED]
To: [Norfolk Boreas](#)
Subject: Norfolk Boreas Project EN10087
Date: 25 August 2020 21:24:39

Dear Planning Inspectorate,

These are my comments regarding the fifth round of questions.

Q5.5.01. The schedule of changes to the Development Consent Order includes the SoS comments to carry across changes from the Norfolk Vanguard as made order and ensure consistency between the two projects.

This action I feel reveals a problem. While it is possible to adjust the dDCO of Boreas to ensure consistency with Vanguard, there is no mention of the possibility to adjust the DCO of Vanguard to provide consistency with Boreas. Considering no cumulative effects were considered in the Vanguard examination, there is more likelihood that the Vanguard DCO will require changes, once the cumulative effects have been considered in the Boreas Examination.

Q5.9.5.5. I agree with the ExA, and also have concerns over Breckland Council's resource constraints hampering their ability to cope with the complex detail involved in post-consent approvals R16 and R18.

a) I agree that an early design review should take place.

b) I consider the project is of such complexity and scale that findings should be sought from both a local forum, for local knowledge and an independent design review to find any technical oversights.

As you are aware, I have concerns over the information provided by the applicant, on which to evaluate design requirements, therefore if an independent design review is provided with the applicant's information, this should be balanced with relevant interested parties' submissions to provide the independent design review with all the available, and most comprehensive information.

Q5.9.5.6. If the inclusion of the independent design review for substations in the DAS,dDCO and at R16 (3) gives the review the most effect, then I consider it should be included in both.

Q5.16.0.1.

a) The applicant's overriding view that previous planning decisions are a material consideration for subsequent similar examinations has its shortfalls. As mentioned before, the Vanguard examination did not consider cumulative effects, and as the planning examination has evolved, new information and a better understanding of the information all leads to requiring differences between the projects.

b) Regarding the SoS decision on the Vanguard application,

1. The SoS Decision Letter 4.8 states, "*The ExA also notes that there were suggestions from Interested Parties that it would be beneficial if the grid connection points for the proposed Development (at Necton) and for the proposed Hornsea Project Three (at the Norwich Main substation) could be swapped between the projects.*"

And 4.9 states, "*The ExA notes the Applicant's approach to site selection for the onshore and offshore elements of the projects and the part that was played by National Grid in narrowing down the range of options, particularly in respect of the onshore substation at Necton. The ExA notes [ER 4.4.26] that the consideration of an offshore ring main is a strategic matter which involves many layers of interested organisations and is not, therefore, suitable for consideration by the ExA in a forum which is*

considering a development consent application for a single site. Similarly, the ExA concluded that suggestions about a grid connection swap between the proposed Development and Hornsea Project Three were not matters to be considered during the Examination. "

The SoS needed to be aware that Vattenfall's Strategic Approach to Selecting a Grid Connection Point, explains Vattenfall had the choice between Norwich Main or Necton, and it was their decision, as part of the Vanguard and Boreas projects, and therefore should have been part of the Vanguard considerations.

This decision still needs scrutiny as to whether it qualifies as good design.

2. The SoS needed to be aware that the applicant's visualisations depicted the best case scenario, with applied blue dotted lines to depict the required worst case scenario. If the visualisations were presented as photographs of the views from the viewpoints, with only a blue dotted line box overlaid to demonstrate the extent of the impact from the presents of the substations, I doubt they would be considered suitable or adequate.

New visualisations are needed, showing the converter halls actually on the site, and in worst case scenario, for a revaluation.

3. Regarding Noise and Vibration, the SoS needed to be aware that only 2 of the long term monitoring points were monitored for the planned week out of 12, and the noise limit was set 6.6dB 5mins and 3.6dB 15mins above the poorly measured average background noise level, and residents close to the substation are in a quiet, tranquil area.

More results are needed from the 10 remaining monitoring points, especially those in West End Bradenham, as this is a very quiet area, and the noise limit needs to be under the average background noise level for quiet areas where noise creep is a possibility.

Thank You For Your Attention, Colin King 20022983.