

**From:** Colin King [REDACTED]  
**Sent:** 01 September 2020 22:11  
**To:** Norfolk Boreas <NorfolkBoreas@planninginspectorate.gov.uk>  
**Subject:** Norfolk Boreas Project EN10087.

Dear Planning inspectorate,

Applicant's Comments on Deadline 13 Submissions (my comments).

1.11 Rep13-042.

The applicant explains "the Rochdale Envelope presents the maximum parameters of the project based on the worst case assumption."

Also they state "it is not possible or appropriate to set minimum parameters" and yet they show the images of the converter halls in their words, "***A 3D model of the onshore substation has been used to give an indication of what the substation will look like and a blue dotted box represents the Rochdale envelope, within which the substation elements can move. By showing the blue Rochdale envelope alone, we may overestimate the extents to which the development could be visible. By showing just the substation model alone, we may underestimate visibility. Hence, the use of both techniques in the visualisations.***" (from comments on relevant representations page 153, table 24 no4,)

This suggests the substation model (converter halls) in the visualisations are shown as a possible underestimation, and yet they state "it is not possible or appropriate to set minimum parameters," and it should be shown as a worst case assumption.

This I believe fails to show the required worst case assumption, as it is not obvious that the blue dotted box is anything more than the extent of footprint dimensions.

Viewpoint 2. Lodge Lane South

Viewpoint 3. Lodge Lane North

Viewpoint 7. Ivy Todd Road East

specifically give an impression that the converter halls are built out of the site footprint.

1.12 Rep 13-043.

I conclude from this explanation that this exercise, of professionally assessing the deprivation in a population and its resilience to additional negative impacts from the proposed project, can only be a tool to provide an estimation of the minimum mitigation needed, as the position of the project is fixed, mitigation is the only element that can be adjusted.

Unfortunately there is another practice used in the considerations of the project by the SoS to establish the minimum mitigation applicable. This is the perceived negative correlation between the overall value of the project to the nation and the amount of mitigation required to conceal the project from the immediate close residents.

It would seem the above considerations, and in my opinion the optimistic visualisations, are all conspiring to result in inadequate mitigation. There seems to be an imbalance in the process to achieve appropriate mitigation.

The rural nature of the area could be considered to redress the balance, but this seems to get lost against the value of the project.

I contend as the project is excellent with regard to its function and economics, make it an all round excellent project and finish it with adequate mitigation to provide overall satisfaction.

1.22 Rep 13-053.

I asked 5 specific questions:

1. Why do you consider it acceptable to use a noise limit 6.6dB 5mins and 3.6dB 15mins, over the average background noise level?
2. Why do you think it appropriate to use the same noise limit as Dudgeon, when Dudgeon's nearest sensitive receptor is next to the A47, and Vanguard's and Boreas's are in a quiet, tranquil area?
3. Why isn't there any adjustment in the sound sensitivity rating of residential properties, according to the existing character of the surrounding area, and residential properties are rated moderate regardless of whether they are near a main road, in a village, or in a quiet area?
4. Are you regarding Necton and the surrounding area as an industrial, commercial area, as you are using a noise limit greater than the measured background noise level, and only intending to partially screen a large industrial construction, in a rural area?
5. Is it acceptable to use data from only two long term sound monitoring points, and one measured for a day, out of the proposed 12?

They were addressed in 1 general summary and not answered specifically. The answer demonstrated that my concern regarding sharing the Dudgeon's noise limit is not understood.

***" These limits are considered appropriate to ensure the soundscape at the identified and agreed receptors does not change beyond the existing Dudgeon condition noise levels from the operation of the Norfolk Boreas and / or Norfolk Vanguard onshore project substation."***

This statement demonstrates my point of concern. The applicant and Breckland Council both seem to believe that simply using the same noise limit that was agreed for Dudgeon, for the Vanguard/ Boreas projects will give the same acceptable result. Unfortunately there are differences being overlooked, that will cause in this case a different and unsatisfactory result. I have explained this problem more than once before, but it seems necessary to do so again.

The noise limit as I understand, is derived from the existing average background noise level of the area around the project. This is established by recording the background noise for both a day, short term and a week, long term. The level is set by taking the recorded sound level from the closest sensitive receptor, and the receptor's sensitivity, to arrive at a limit. The data from the other monitoring points can then be used to check that the more distant receptors will not be adversely affected.

The Dudgeon substation's closest sensitive receptor, SSR11, is a house less than 20m from the A47 road. As the closest receptor to the Dudgeon substation (450m) it would have been used to calculate the Dudgeon's noise limit of 35dB 5mins and 32dB 15mins. The A47 road noise would have produced an unnaturally high recorded background noise level, and this produced the Dudgeon's noise limit, as above.

The Vanguard/Boreas projects' closest receptor is SSR2, 750m from project, 1,620m from the A47, in a quiet area, with an average background noise level of 28.4dB. As I have submitted before other examples of noise limits on substations and reasons for setting noise limits below the measured average background level in quiet areas and areas vulnerable to noise creep, I cannot understand the applicants insistence that it is correct to use Dudgeon's sound limit. There is little similarity between the projects, other than it's general location.

The above statement from the applicant demonstrates a very simplistic view of the situation, believing that using the same noise limit for Vanguard/ Boreas, as was set for Dudgeon will give the same acceptable level of noise, at the noise sensitive receptors as the Dudgeon project has.

Considering the data from only 2 out of 12 long term monitoring points was collected, this may have been considered satisfactory because the intention was already there to use the same limit as Dudgeon, or the decision to use Dudgeon's limit may have been taken because such little data was gathered.

This situation seems to have arisen from the applicant and Breckland Council thinking, using the same noise limit as the Dudgeon substation would result in the same acceptable outcome for Vanguard/Boreas.

Thank you for your attention,      Colin King      20022983.