

Necton Parish Council (NPC) Final Boreas Representation

NPC would like to ask the Boreas Examining Authority to review the mitigation strategy agreed between Vattenfall and Breckland District Council (BDC) in the Statement of Common Ground published on the PINS website with respect to the Breckland planning core strategy published on the Breckland website.

To reinforce our concerns, NPC raised an official complaint with BDC on 25 September as follows:

Breckland District Council has not followed the Breckland Core Strategy and Development Control Policies Development Plan with regard to the planning inspectorate examination of both the Vanguard and Boreas projects for national infrastructure due to be sited in Necton. Details can be found in appendix 1 below.

We believe that the mitigation proposed for both Vanguard and Boreas is completely inadequate. Cumulative effects at Necton were not considered when Vanguard was examined. Vattenfall have made a representation that Boreas should be approved in its current form because Vanguard was approved and the Secretary of State must be consistent in his decision-making.

We consider this approach to be flawed, because permission has been granted for a judicial review of the Vanguard approval and, if the review is successful, Boreas may not be expected to disregard the cumulative effects at Necton from Boreas and Vanguard together.

We ask the examining authority to require an alteration to the Boreas DCO such that the mitigation suggested by Necton Parish Council and the Necton Substation Action Group of 10-metre-high earth banks covered with mature trees is implemented by the project.

In addition, Necton Parish Council would like to draw the examining authority's attention to the strategic direction the government is adopting to install an Offshore Transmission Network (OTN) for a very much cheaper and less destructive connection into the National Grid system for windfarms that will benefit the consumer significantly and prevent environmental damage to the countryside. There is a concern that with the already approved Vanguard project, it would not be worth considering refusal of Boreas on the grounds of environmental impact at Necton. However, the Judicial review scheduled for Vanguard could change the situation for Boreas. We would urge the Examining Authority to take into account the result of the judicial review in their deliberations. If successful and the Vanguard approval is reversed, the Boreas and Vanguard connections could both be made into the new OTN which would benefit everyone, including the developers. We ask that the Boreas DCO is refused as it stands because a viable, less destructive alternative is available.

Necton Parish Council
7 October 2020

Appendix 1

Analysis of Core Strategy and Development Core Strategies Not Followed with Respect to the Proposed Vanguard and Boreas development Projects

Breckland Council have adopted development control policies that are set out in the Breckland Adopted Core Strategy and Development Control Policies Development Plan document that can be viewed on the Breckland Council website.

There are a number of paragraphs in this policy that are applicable to the Vanguard and Boreas development and that have not been adhered to in the contents of the Statement of Common Ground (SofCG) between Breckland Council and the applicant.

Policy CP 11

Protection and Enhancement of the Landscape

The landscape of the District will be protected for the sake of its own intrinsic beauty and its benefit to the rural character and in the interests of biodiversity, geodiversity and historic conservation. Development should have particular regard to maintaining the aesthetic and biodiversity qualities of natural and man-made features within the landscape, including a consideration of individual or groups of natural features such as trees, hedges and woodland or rivers, streams or other topographical features.

The rural character of the Necton area will be irretrievably damaged by the Vanguard and Boreas DCO applications in their current form. Adequate mitigation is possible, but is not being proposed. There has been no information provided via a cost-benefit analysis which could have been used to support the applicant's refusal to install adequate mitigation. At least this would have allowed discussions between the interested parties. Instead, a point-blank refusal was the applicant's position. **This was accepted by Breckland in contravention of their development policy.**

Paragraph 4.6 of DC1 Protection of Amenity states:

The Local Development Framework is promoting a step-change in the scale of development in Breckland. This step-change will result in significant levels of house building, commercial and industrial development and all the associated service and infrastructure provision. The impact of this scale of development on a rural District such as Breckland needs to be carefully controlled so that the natural and built environment, and the well-being of communities and businesses are not adversely affected by the change. Therefore, this policy will apply to all forms of development within the District, including changes of use.

This is not reflected in the Breckland SofCGs

Paragraph 4.7 and 4.8 add:

The development of land and buildings presents the opportunity to provide improvements to the social and economic well-being of everyone living, working or visiting the District. The protection of the character of the District landscapes and townscapes and its historic and natural environment will ensure that people can continue to enjoy the unique amenities of the District. The protection of the amenities of the District is not only key to the social well-being of the District, but also its economic well-being. If Breckland is to develop as an economic force in the region then it must be promoted as an attractive place to work as well as live and the District's environmental and cultural assets are key to this promotion.

For the sake of clarity, in the context of this policy, amenity is defined as those desirable features of a place that ought to be protected in the public interest. This might include protection of the visual appearance of the

landscape or townscape; or in terms of residential amenity this might be the protection of a suitable level of privacy, or safeguarding from excessive noise or light pollution. In considering forms of disturbance, this consideration will include, inter alia, the effect of increased heavy goods traffic from a proposed development and issues of shadow flicker as a result of a wind turbine development.

The attractive nature of the local landscape is not being preserved as required by this Breckland procedure.

Procedure DC15 adds to DC1 in that it specifically applies to renewable energy provision. It states:

Renewable Energy

Proposals for renewable energy development ⁽¹⁰⁾, will be supported in principle. Permission will be granted for these developments unless it, or any related infrastructure such as power lines or access roads etc, has a significant detrimental impact or a cumulative detrimental impact upon:

1. Sites of international, national or local nature and heritage conservation importance;
2. The surrounding landscape and townscape;
3. Local amenity as a result of noise, fumes, electronic interference or outlook through unacceptable

visual intrusion;

4. Highway safety.

Where development is permitted, mitigation measures will be required as appropriate to minimise any environmental impacts, such measures will be secured via condition or legal agreement. All development proposals for a renewable energy generation scheme should, as far as is practicable, provide for the site to be reinstated to its former condition should the development cease to be operational.

The proposed Vanguard and Boreas substations are huge buildings and are planned to be erected on the highest land in the area. This will have a significant effect on the surrounding landscape. Necton Parish Council and the Necton Substation action Group (local residents) all made representations to the Vanguard and Boreas Examining authorities both orally and in written form objecting to the effects on the rural landscape that will not be effectively mitigated. They also met with the designated Breckland Council representative to ensure Breckland were aware of their concerns and the mitigation measures they would consider to be adequate. The cumulative effect of Boreas and Vanguard together has not been considered by Breckland or the Examining Authority during the Vanguard examination but should have been and will at least double the adverse effect on the landscape. These are sister projects using the same ductwork, adjacent National Grid connection and substation sites so their cumulative impact was obvious from the beginning of the consultation process.

Necton Parish Council support renewable energy but would like it to be installed with adequate mitigation. The mitigation we requested is the same as that which has already been built along the Northern distributor road between Necton and Norwich. Breckland Council should, in our opinion, have been supporting our request for this mitigation in their SofCG and did not. The Breckland procedures call for adequate mitigation and have not been followed during the consultation and examination process.