

From: [REDACTED]
To: [Norfolk Boreas](#)
Subject: Norfolk Boreas Project. EN010087.
Date: 07 October 2020 22:56:39

Dear Planning Inspectorate,

I must take this last opportunity, at the risk of being very repetitive, to reiterate my genuine deep concern.

The converter halls I think will be a shock in reality, and will astound many people in the area, and I fear this happening with no way of recourse

The noise level set, points to the substation being heard most of the time, especially when the area should be quiet, and at rest. Again I fear little chance of recourse. At the moment, with my experience of Breckland Council I have little confidence that they would correct the situation. I feel there is a reluctance to re-evaluate decisions, and I can not see any reason for this not to persist. With the notification on 1 July 2020 that the Norfolk Vanguard Project had been granted a development consent order, there was a sub-note: "If you have any queries about the Secretary of State's decision letter or the order please contact: Department for Business., Energy & Industrial Strategy."

As I have ongoing issues with the combined substation projects, I put together some questions and sent them to BEIS. I have included them here because of their relevance to the Boreas Project.

No reply has been forthcoming, again adding to my anxiety over unlikely recourses.

I also include an update from George Freeman M.P. regarding the progress being made with the formal review including integrated offshore connections.

Thank you for your attention Colin King.

1. I raised a concern over the longer than necessary cable routes for the Vanguard/Boreas and Hornsea 3 projects, resulting from Vattenfall initially choosing Necton, leaving Orsted no choice other than Norwich Main, in the Vanguard consultation, and through the examination. Only now after the decision has been made, do I have the first opportunity to learn that this fundamental element of good design is something the ExA will not look at.

" 4.4.26. The development of an onshore ring main to facilitate the bringing onshore of electricity generated offshore is something which appears to require co-ordination between projects. As such it is not an alternative which can be considered within the confines of the examination of a single offshore wind farm project. Similarly, arguments that if the connection points of Norfolk Vanguard and Hornsea Three Project were exchanged, then the total onshore cable routes would be reduced, appear sensible propositions but are suggestions which are outside the scope of this Examination. "

A. Could you please explain the suggested similarity between the ExA's inability to examine the development of an onshore ring main," which appears to require co-ordination between projects", and the ExA's inability to examine Vattenfall's independent decision to connect at Necton, then resulting in giving Orsted no choice, other than to connect to Norwich main. This was a totally and wholly Vattenfall decision for only the Vanguard/Boreas projects, which subsequently had a detrimental knock on effect to the

Hornsea 3 project. There was no coordination between projects in this decision.

B. Could I have been informed, during the examination, that the ExA thought this point was outside the examination's scope, to have enabled this point to be presented in other avenues, where it would be within scope to examine?

C. Could you please advise how to proceed with this point now, as it is still a valid concern, and a relevant point to the ongoing Boreas Project.

2. Could you please explain why it has been considered acceptable to use a noise limit 6.6dB 5mins, 3.6dB 15mins above the agreed average background level in a rural tranquil area.

3. Is it correct for the ExA to rely on the SoCG with local authorities to form their conclusions on visual impacts and noise and vibration impacts?

4. Should the ExA have mentioned in their recommendation that out of the 12 agreed long term sound monitoring points only 2 successfully recorded a full week's data, and 1 recorded a day, and why was this considered satisfactory?

5. The high operational noise limit set, the minimal attempt to screen the visual impact of 19m high halls with immature trees, and with these 2 paragraphs from the ExA's recommendation in the first instance, describing the existing Necton substation as "somewhat at odds with the rural landscape" and then using it as a justification for building even larger and higher constructions, over a 5 times greater footprint than Dudgeon, (Vanguard and Boreas) suggests the ExA made little allowance for fitting a large industrial construction into a rural landscape, compared to building it in an already industrial, commercial area.

" 4.5.50. The substation extension: The existing substation is framed by the A47 hedgerows on its northern boundary but otherwise sits in relatively open land. The Necton National Grid substation and Dudgeon substation are prominent within the localised area and the existing large-scale building and associated infrastructure is somewhat at odds with the rural landscape. The extension would substantially increase the existing footprint and would significantly add to the impression of a large-scale energy development in this locality."

" 4.5.53. There are a number of factors to take into consideration in the assessment: the existing baseline already contains the Dudgeon substation and electricity pylons along the horizon, the landscape effects would fall within a smaller area of a larger whole when viewed in the context of the wider LCA and as replacement planting became more established, the effects would be further ameliorated."

Could you please explain what design features are included in the project that are the result of considerations given, to fit this totally out of character and scale construction into this rural landscape.

6. 4.5.53. Seems to say that the Vanguard project would make the Dudgeon substation look small, which is correct, but I can not see the relevance. Or the ExA is suggesting that

the Vanguard project would fall in a smaller area of a larger whole when viewed in context of the wider LCA, which can only mean when viewed with Dudgeon, as that is the only existing construction there is, and that is obviously factually incorrect.

Could some clarity be given on the meaning of this paragraph please.

7. Can it be explained how immature trees can mitigate 19m high converter halls on a high plateau?

" 4.5.49. The new onshore project substation site would benefit from some substantial existing hedgerows and woodland blocks within the local area which would assist in ameliorating landscape character harm. Necton Wood to the north and established planting around Lodge Farm to the south would provide a degree of screening and a sense of enclosure."

This paragraph seems over optimistic. Necton Wood will screen Little Fransham only, Lodge Farm trees are 110m wide, and will have a limited affect.

8. " 4.12.41. The noise rating level of the proposed substation would be controlled and monitored by R27 of the dDCO. This limits the noise rating level of the proposed substation to that of the existing substation at Necton. BC agrees, in its SoCG, that proposed mitigation would ensure that the noise rating level would not exceed the maximum level imposed by R27 and that the wording of R20 and R27 is appropriate and adequate for the mitigation of impacts associated with noise and vibration."

Regarding the above paragraph could you please explain why it was judged relevant to use the same noise limit, that was set for the existing Dudgeon substation, for Vanguard. Dudgeon's nearest sensitive receptor is at 450m and is next to the very busy A47.trunk road, giving a very high average background noise level, compared to Vanguard's nearest sensitive receptor at 750m, set in a quiet hamlet, 1.7km from the A47. giving an agreed background noise of 28.4dB. The situations have little similarity.

9. Paragraph 4.8.39. of the recommendation states:

" The early investment in education and skills, if planned effectively, would be capable of supporting Norfolk and the East of England in its drive to raise aspirations and to achieve sustainable economic growth."

This seems a very speculative statement from the ExA.

Can the fund for investment be quantified? Is it large enough to improve the education and skills enough to achieve sustainable economic growth over Norfolk and the East of England, as suggested? This seems very optimistic for one project, and a potentially misleading recommendation. Can it be explained?

Should the ExA as far as possible base their recommendations on qualifiable information?

If the investment fund can not be substantiated, or proven to "achieve sustainable economic growth," should this statement have been included as a benefit to balance against the real disadvantages that are going to be experienced by the host community?

10. I sent in new information on 28-2-20 regarding the degree of inaccuracy discovered in the applicant's visualisations, and on the 27-4-20 new information regarding the noise limit set for the operation of the substation. Both pieces of information are potentially large, and could have equally large effects on the finished substation. As far as I can tell these pieces of information have not been considered.

The ExA in their report explained:

" 4.5.102. Finally, whilst the Norfolk Boreas Offshore wind farm has been included in the Applicant's LVIA cumulative impact assessment, the ExA have not considered it in this part of the assessment due to the limited amount of details available. The ExA considers it would most appropriate for cumulative impacts to be considered in any future examination into Norfolk Boreas."

Considering new information is not being considered in the Vanguard examination, but is getting full consideration in the Boreas examination, and the cumulative impacts are not being considered in the Vanguard examination, but are being considered in the Boreas examination, this provides the possible situation where the specifications of the Vanguard DCO differs from the Boreas DCO. As a result, an extreme situation at the substation construction could occur, where half the construction could have a different noise limit to the other, or half the construction could be buried and banded, and the other half set at existing ground level and screened with trees, as examples.

Could you please explain what mechanism is in place to cope with such a situation, to ensure a sensible, and coherent total substation construction if Boreas gains approval. If Boreas gains approval, would it have to mitigate the total cumulative effects of the three substation projects on the Necton site?

Considering Vanguard and Boreas are presented as identical twins onshore, with the same specifications, and Boreas was included in Vanguard's documents in enough detail to satisfy the requirement to show the worst case scenario in conjunction with Vanguard, it would appear that there was enough information available to judge the cumulative effect.

11. It is now referenceable, and industry recognised, that this form of point to point connection is outdated and past its sell by, and one of the largest barriers to further expansion. The situation is being reviewed and investigated as a matter of urgency, to find a better method of connecting this generation of offshore wind farm.

Bearing this in mind, can the connection and substation part of this project still categorically legally meet all the criteria needed, to fall into the NPS. EN-1, EN-3, and EN-5 regulations, as it is no longer regarded as a satisfactory method of connecting to the grid, and better methods are being investigated. If it was built without the privileges afforded from NPS, more realistic and suitable mitigation would be required, that would make the substation fit into its surroundings, rather than standing out.

Afternoon,

Offshore Ring Main campaign

As someone with a strong interest in this issue, I wanted to provide an update on the progress that has been made since my last email just before summer recess.

You'll be pleased to know that I have been working away on this over the summer – along with the core group of Norfolk and Suffolk MPs who share our concerns about the current approach to delivering offshore wind infrastructure. Not only have we put together a technical specialist

advisory group to guide us, we have held several meetings with experts and officials from across countries across Europe (Belgium and Germany to name just two), who have confirmed that the technology does indeed exist for integrated offshore connections.

Thank you also to all of you who have supplied information, advice and contacts. These details have been hugely helpful.

Good news. I think we're 95% of the way to fully convincing Ministers and officials at BEIS that the existing connection is not fit for purpose.

At this stage, the Department have, of course, commissioned the formal Review and are accepting of the case that a proper strategic Plan is needed for the future – to ensure that the country can fully grasp the opportunity that is offshore wind power and meet (and exceed) 'Green' targets. However, currently they still are indicating that existing permissions will stand, but I am hoping that IF we can get a change of policy announced, then there might be a chance that the current Review will allow us to reopen the decisions on current applications and allow us to get a better solution at Necton.

You may have seen today's EDP article (see [here](#)) – highlighting National GridESO's report (as part of the Review), which states that an integrated offshore connection for future wind farms (but not those already in the planning process or with permissions) would save UK consumers £6 billion and more than halve the amount of infrastructure needed onshore.

FYI, I have set up a call for the core group of MPs and I to meet with National GridESO officials tomorrow to discuss the report in greater depth – so that we are best able to engage with the Energy Minister and his officials going forward.

(The full National GridESO report can be found [here](#))

Rest assured, I remain firmly committed to pursuing this – and hope to provide further updates shortly.

Please do feel free to circulate this report to anyone and everyone who you think will be interested.

Yours,

George



George Freeman MP

MP for Mid Norfolk