

Dear Planning inspectors

I continue to have very strong concerns about the operational noise limits of the substation being set too high for Ivy Todd. There is also missing baseline sound monitoring data from 2017 for SSR2 at Ivy Todd, PE37 8JB. I reiterate some points already mentioned and also add more.

The Secretary of State says in the November 2016 (scoping response, statutory). "Noise impacts on people should be specifically addressed and particularly any potential noise disturbance at night and other unsocial hours such as weekends and public holidays."

I have looked again at the Environmental statement, Appendix 25.1 Baseline Noise Survey Vol3

Table 2.15 Baseline noise data – SRR2 (LONG TERM)

Sound monitoring was carried out between 28/04/17 to 05/05/17 and I am particularly interested in the Ivy Todd area, PE37 8JB at SSR2 where the closest resident to the substation lives. Only 262 samples were collected out of a possible 448 which is only 58.5% and I cannot find results for short term sound monitoring. Noise is a critical to wellbeing and as all receptors are classified as a medium sensitivity, it leaves no room for error. ("Medium Receptor has limited tolerance of effect Noise Receptors have been categorised as medium sensitivity where noise may cause disturbance and a level of protection is required but a level of tolerance is expected")

My main concern is that the permitted noise level for the new substations are set at the same level as the Dudgeon substation near the busy A47 road, 35dB 5mins and 32dB 15mins gathered from its closest sensitive receptor. I am not sure how the same noise limit can be justified for residents at Ivy Todd, as the background noise level there is only 28.4dB where Dudgeon's operational noise is undetectable as is a lot further away than the new substations will be. Therefore even if operational noise of the new substations does not exceed the permitted noise level of 32dB, it will be constantly heard at Ivy Todd, as above the 28.4dB which they are used to hearing in their day to day lives.

The new substations will be closer to residents at Ivy Todd than Dudgeon so to set the same background noise limit as Dudgeon is not conducive to it appearing to be silent. The applicant explained that, " As the proposed footprint of Norfolk Boreas is further from the A47, additional measurement locations were included as part of the Norfolk Boreas onshore project substation survey to determine the prevailing soundscape within the vicinity of the operational site."

But the fact that Dudgeon noise limits were set using sensitive receptors near the busy main road is completely unsuitable to compare to residents in a comparatively quiet village hamlet. The noise level currently experienced from Dudgeon, in Ivy Todd will be permitted to increase to 6.6dB 5mins / 3.6dB 15mins above the average background level. Totally out of place and unacceptable for a quiet area.

This issue has been raised again and again by the resident of Ivy Todd Farm, post code PE37 8JB in many submissions but he never gets a satisfactory response and I have also written about this in my past submissions too.

The applicant's last response, commenting on deadline 16 submissions re Operational Noise says;

"1. REP16-018 continues to raise concerns regarding operational noise and potential increases in background noise levels during operation."

As stated in the Applicant's Comments on Deadline 15 Submissions [AS-081] in response to REP15-006 Breckland Council required that noise limits were met under the cumulative position to ensure not increases in the noise levels, which has been secured within the DCO requirement."

They do not appear to understand our concerns as it's not about "potential increases" in noise levels during operation, but that the noise limit is already set too high from the start so when the plant is operational there is a margin between 28.4dB and 32dB where it will be heard before being deemed to be above the noise limit.

The following answers from the applicant commenting on deadline 16 says;

2." Mr King questions why certain locations (wood farm and the west end of Bradenham) were not included in the baseline noise monitoring and why the Dudgeon noise limit was used.

As stated in the Applicant's Comments on Deadline 15 Submissions [AS-081] the methodology for undertaking the noise survey measurements within the Norfolk Boreas onshore project substation study area was agreed during pre-application consultation as part of the Evidence Plan Process through Expert Topic Group meetings with relevant stakeholders. The Local Planning Authority agreed that the methodology for determining and deriving background sound levels was appropriate."

I think the point here is that some of the quieter locations were missed when calculating the averages, which again disadvantages Ivy Todd

I am sure expert topic groups and planners will not be living in such close proximity to the substation and just have an overview of the whole situation, so am unsure how their approval of the methodology used, answers our questions or reassures us in any way. Why was consideration not given to close residents early on? Are they not just as relevant as the relevant stake holders?

The applicant states that; 25.3 Consultation 53. "Consultation is a key part of the EIA process and is an ongoing process throughout the lifecycle of the project, from the initial stages through to consent and post consent".

But the applicant does not have a meaningful dialogue with people who have local knowledge and whose lives will be changed and If this is truly not a tick box exercise, I can only think that the applicant is lacking in its duty of care to ensure the closest resident lives will not be adversely affected.

The applicant concludes in chapter 25 of the environmental statement 25.12 "351. Operational phase impacts for both scenarios were predicted to be moderate adverse at assessed sensitive receptors without mitigation. With the incorporation of suitable mitigation (as detailed in Table 25.42), residual impacts are predicted to reduce to negligible at identified receptors."

In the scoping response of November 2016, the SoS identifies "many potential operational mitigation measures, including the installation of acoustic enclosures and barriers and the construction of a landform/embankment around the substation....." Earth bunds and embankments are something we would welcome to mitigate both sound and visuals (and they are not so out of character for this rural area as the view of the substation landscape would be, an excuse used by the applicant.)

The Applicant has agreed a Design Review Process in the DAS updated at Deadline 14 which includes the commitment to undertake the design review at an early stage, also involving Breckland Council, so I hope there will be an opportunity to take another detailed examination of the background noise

levels and limits, as some data has been missed when the sound monitoring was carried out in 2017 and no further attempt has been made to rectify this. It is imperative that background noise is not a nuisance to the people living closest to the substation at Ivy Todd Farm and Ivy Todd residents.

Thank you

Yours sincerely

Patricia Lockwood