

From: [NectonSubstationAction Messenger](#)
To: [Norfolk Boreas](#)
Subject: Re: EN010087 – Norfolk Boreas
Date: 19 October 2021 12:12:36

BOREAS APPLICATION

We appreciate this opportunity to comment on the applicant's responses to the SoFS, but as this is the last chance to say anything until decision we felt we had to highlight a few points that we do not consider have been satisfactorily addressed by the applicant. This shows that the applicant has not done any better on the Boreas application than they did on the Vanguard one as regards cumulative effects. This in turn means that should the SoS be of a mind to approve this project, and another Judicial Review become necessary, we will be confident that the judge will again find in our favour.

So as our final information for the SofS we would like to make the following points, and we thank the SofS for his attention.

Lighting up Necton Wood (an ancient woodland since the time of King Henry II, and one of the few areas of ancient woodland left in the area) seems to be acceptable to the developer. But many generations of wildlife, including nocturnal wildlife have relied on this woodland, and one can only imagine the distress and disruption bright lighting will cause to them. Indeed wildlife organisations have told us they will likely die through not feeding enough through confusion. Daylight animals and birds will also be disrupted and will try to rise with the light as they would the sun. This area also faces residents of Little Fransham and Top Farm, who undoubtedly won't approve of lights in their direction either.

Whilst the developer appears to be offering shaded lighting on the other 3 sides of the development, Dudgeon also promised the same to Necton, and yet we had to engage the services of Breckland's Environmental Enforcement officer (Sue Hammond) on many occasions in order to point out that the lighting was not being used as promised. We also had to phone the control room in Yarmouth many times, because the men had gone home without turning off the lights.
Cumulative effects with Vanguard will double these problems.

Mitigation of Substations in Necton – this subject has never been covered satisfactorily since day one. Without huge amounts of funding this project will be impossible to mitigate. The developer has clearly demonstrated that they have not set aside enough funding to achieve this. They have so far turned down green walls, (ie walls of planting to cover the outer walls of the larger structures), camouflage painting (by this we mean actual mural like paintings, not just dabs of random colours), which is available, underground substations (which are used quite a lot now), high bunds (earth banking of at least 6m high, which will cost a lot) planted with trees.
Cumulative effects with Vanguard will double these problems.

Earth bunds were turned down as the developer claimed that Breckland Council said they did not fit in with the local landscape. Apart from the fact that Jon Berry of Breckland Council told us that he did not say this at any meeting he had before he left, there is also the fact that Planning Departments in Norfolk have agreed to many earth bunds throughout the county. The largest adorn the Northern Distributor road, to protect homes from noise and visuals. And a new housing development along the A47 in Little Fransham and in Necton have used large earth bunds to block the noise and visuals of the A47 from those houses.

It is interesting to see that whilst the applicant has dismissed adequately high bunds to shield visuals of their own substations, they are planning to build a huge earth platform, possibly up to 5 metres high in order to level the very steep terrain of the site of their extension to the Dudgeon National Grid Substation. How convenient this is for them.

Can we ask when the applicant made it known that an enormous amount of lorries

of earth/rubble will have to use the A47 to get to the site in order to construct this platform. When did they make those facts known?

As regards further information concerning the use of trees and earth bunds in the local area we direct the SoS's attention to this article recently published in the Eastern Daily Press [More than 500 trees on route on Norwich NDR have died | Eastern Daily Press](#) [REDACTED] "A further 500 trees and shrubs, which were planted along the route of the Norwich Northern Distributor Road, have died, council bosses have confirmed. Work to replace them will start next month, but it means more than 3,500 trees and shrubs planted next to the road since 2016 have perished." This comment and others like it in the article confirm that trees alone are not suitable to be considered as mitigation for projects' visual impacts. Other developers in the Necton area have used high earth banks (bund) with a lot more success than they have trees alone.

Cumulative effects with Vanguard will double these problems.

Top Farm The developer has never given a satisfactory answer as to why they refused to consider the Top Farm site at Necton, which would have had the approval of Breckland Council, Necton Parish Council and NSAG, as well as lastly but not least, the owners of Top Farm who were amenable to negotiating a sale. Top Farm, as well as saying costs (much closer to the A47, much closer to Dudgeon, much closer to the Dudgeon National Grid substation, and much easier to mitigate), was turned down because the developer said it was not within the original 3km area. As it is right next to the Dudgeon National Grid, whereas the current choice is much further away, this would seem nonsensical. One would have thought that an 'approved' site would have been reward enough to make changes..

Fire Risk When asked about this, the applicant has always merely said that substations and electrical installations rarely catch fire. It has been shown quite recently by the fire in the French/British connecting cables that this kind of fire DOES occur. There are in fact dozens of substation fires in the UK alone every month as a quick internet search has shown (previously submitted) In any case a fire risk's rarity is not a guarantee that it will not happen. If it does, toxic fumes from the many dangerous chemicals and oils in all substations, let along the biggest in the world, will blow into any of the surrounding residential areas. (The SofS will be aware that the proposed site is encircled by Little Fransham, Little Dunham, Necton, Ivy Todd, West End, Ashill, Holme Hale, and Bradenham.) The fire officer at Lodden (Norfolk) told us that there will possibly come a time when difficult choices would have to be made about 'who to save'. _

Cumulative effects with Vanguard will double these problems.

Terrorism Risks The developers actually laughed at us when we mentioned this. Terrorism as the SofS knows well is one of the greatest risks to our country, especially terrorism involving utilities. Necton will be hosting the most enormous, obvious target to terrorists, especially with the advent of drones. We would like this to be taken seriously.

Cumulative effects with Vanguard will double these problems.

Noise Years ago some of Necton's concerned residents, had a meeting with Vattenfall representatives to discuss construction and operational noise issues of their proposed substations. The applicant's attitude towards the residents' concerns as to how they proposed to make constructions 4.5 times larger than Dudgeon, as quiet as Dudgeon, was that they would 'sort that out after they got permission'. This has been their stance ever since. Meanwhile the thought of having lives disrupted, sleep disrupted and the possibility of being stuck in a blighted property as well, as driven some residents to the brink of mental illness. This is not the way these things should be done.

Cumulative effects with Vanguard will double these problems.

Flooding Ivy Todd has historically suffered from flooding. (Sometimes over 6 feet in depth) In the 1980s to rectify this farmers put in fields drains including in the clay mantle on the proposed site fields. This clay mantle had prevented drainage for many years before that. The fact that the applicant is proposing to rip up all these drains and cover the land with concrete has created great alarm. The applicant's response to this has been to point to an attenuation pond on their sketchy drawings, which will apparently act as catchment areas, the collected flood waters to be released into the stream when appropriate. That's it. When asked if they would accept liability for any resultant flooding and damage to property, the applicant's response was, 'You'll have to prove it was our fault'. When asked if they were going to co-operate and co-manage the flooding from the site with Dudgeon, to ensure that the Dudgeon attenuation pond didn't release at the same time as theirs, whereby overwhelming the small tributary that takes the flood waters away, they said they would not, but that it would all be sorted out after they got permission. Surely things like this should be sorted out before any permission is considered or at least be dependent on it 'being sorted out'. Residents should not have to live their lives in fear of destruction of their properties by flood water, with no recompense until less can afford legal fees to prove who caused it.
Cumulative effects with Vanguard will double these problems.

NSAG

From: [NectonSubstationAction Messenger](#)
To: [Norfolk Boreas](#)
Subject: Further Response to the SoS letter
Date: 21 October 2021 12:54:45

In response to the SoS BEIS's letter at Reference A, whereby:

*"The Secretary of State considers the information provided by the Applicant in response to those letters to contain new environmental information and invites comments from the Applicant and **Interested Parties** on the representations received."*

The Applicant continues in their 'new' information to refuse to accept that the OTN is a viable alternative, and one which would avoid massive onshore environmental damage. Because of this unassailable fact the examination will never have looked at all possible worst case and best case scenarios, in order for the SoS to make a balanced decision on either Boreas or Vanguard.

Also it would appear to the members of NSAG that they have not been treated fairly by either the applicant or the SoS. In order to make a fair assessment, Vanguard and Boreas should have been presented as one project right from the start. At the very least the Planning Inspectorate's findings and recommendation for the Boreas element of the project must be released now in order that IPs might have a better path of information to use to make their comments.

It was obvious to NSAG that the Boreas panel were much more vigorous in dealing with the obfuscations of the developer than the Vanguard panel. However, since it appears the SoS has started to make a habit of approving projects whilst going directly against the advice of the panels, we are not filled with confidence that the Boreas panel's vigorousness will make any difference to the SoS's decision.

It is surely time that projects with as many problems and issues as this one should be put on hold, as putting sticking plasters on such a massive project can only eventually result in massive mistakes with damages to the government's plans for a sustainable future. Both Boreas and Vanguard, if allowed to go ahead with all the errors and flaws they have, will be looked back on in history as huge white elephants, unfit for purpose and obsolete before they were even built. If the SoS is considering any decision on balance other than refusal, he could approve the offshore parts of these projects while holding permission for the connection until such times as a better offshore connection/strategy is in place.

It has also come to our attention that other developers further down the line have now started putting in "permissive" planning applications with local authorities for massive battery banks in close proximity to their substations, and expanding their NSIP developments via the back door. This appalling lack of consideration for the lives, health, and safety of the nearby residents, fills us with fear and dread that should the SoS go ahead with approval for Boreas or Vanguard then Vattenfall will assume that they will also

get permission to cover more fields, close to residents, with volatile, explosive fire risks.

NSAG