

**From:** [Beverley Wigg](#)  
**To:** [Norfolk Vanguard](#)  
**Subject:** NORFOLK VANGUARD RULE 13 DEADLINE 1 (16th January 2019)  
**Date:** 15 January 2019 12:55:12  
**Attachments:** [Rule13Deadline1.pdf](#)

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Dear Sir/Madam

Please find attached a written representation from N2RS in pdf format.

I would also like to advise that I intend to attend the following hearings:

Tuesday 5<sup>th</sup> February – Issue Specific Hearing on onshore environmental matters

Wednesday 6<sup>th</sup> February – Open Floor Hearing


Thursday 7<sup>th</sup> February – Issue Specific Hearing on the DCO

I may wish to ask questions from the floor.

Kind regards

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## NORFOLK VANGUARD

Representation on behalf of N2RS

Deadline 1

### **The Transmission System**

Vattenfall's decision to commit to an HVDC transmission system was warmly welcomed and hugely significant. It removed a great deal of opposition at a stroke and made the project much more acceptable for many people. Around 1000 people signed up to the N2RS campaign – 'yes to DC, no to relay stations' and of course many other people and organisations also shared our goal.

This commitment to HVDC is also shaping the examination itself. If HVAC were still on the table, the examination would look and sound very different. There would be many more people sending in representations and attending hearings voicing their concerns about cable relay stations and the width of the cable corridor.

Whilst we do not have any reason to doubt the applicant's intentions with regard to this choice of transmission, comparisons have inevitably been made between Norfolk Vanguard and Hornsea Three – and comments made by Orsted at the Hornsea Three Issue Specific Hearing on 4<sup>th</sup> December last year have led to some uncertainty.

After a lengthy discussion about the deliverability of HVDC, Gareth Phillips (representing Orsted) concluded that "In due course having gone down the route of committing to DC - which may be perceived to make their (Vattenfall's) consent process at this stage, simpler, easier and less controversial - they may then have to turn back to make an amendment just like East Anglia One did in the past."

Given how detrimental an HVAC project would be and how vastly different it would look from the one before the Planning Inspectorate now, we feel it is not unreasonable to ask for reassurances that if and when consent is given, it does not allow for any turning back to HVAC. If that were to happen it would make a mockery of the outcome of the consultation and the process we are participating in at the moment. We also attach a letter from our MP Norman Lamb which echoes our thoughts.

Although our primary focus has always been on the transmission system and ensuring that the least environmentally damaging system is adopted, we would like to comment briefly on the following.

### **Choice of Landfall**

We have mostly understood the reasons why the applicant has selected the Happisburgh area for landfall and we are pleased that residents have had reassurances that horizontal directional drilling (HDD) will be employed and that the beach will not be used.

However, the rate of erosion on that fragile coast has far exceeded that predicted by the Shoreline Management Plan, which presumably formed the basis of the applicant's calculations.

Happisburgh is a village under siege, which deserves to be treated generously. Every possible effort should be made to minimise disruption and stress and ensure that any loss to businesses (including of course tourism related businesses) is compensated.

The Marine Conservation Zone appeared to provide constraints which did not allow the applicant to consider other options. It seems wrong that the MCZ - which was designated in 2016 - takes precedence over a village which is believed to hold the oldest evidence of human occupation anywhere in the UK<sup>1</sup>, and which, despite coastal erosion, is a living, breathing village and a popular tourist destination.

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<sup>1</sup> <https://www.nature.com/news/2010/100707/full/news.2010.338.html>

We are led to believe that the land will recover from the temporary intrusion of the cable route, but we have not fully understood why the seabed would not also eventually recover and repopulate – and why the option to breach a small area of the MCZ was dismissed at such an early stage, narrowing the applicant's options.

### **Compensating individuals**

Despite the commitment to HVDC, which has removed many people from the equation, some will still be required to sacrifice their quality of life either temporarily or permanently. Whilst there is a protocol for landowners to be compensated it is not clear how individuals and small businesses – whose quality of life may be compromised, and properties devalued – are to be compensated, if at all.

We would like to know that these people are not forgotten, or overshadowed by more general community benefits. NSIP or no, these parties should not come out of this process disadvantaged in the name of cheaper energy for others.

### **The Crown Estate and National Grid**

Vattenfall, like other energy companies, has had to work with options agreed some time ago and which have not been subject to any public involvement or consultation.

Although this has, for the most part, been a comprehensive process – the most important decisions were made long before the public had any knowledge of this project. The Crown Estate presumably decides which areas of seabed are available and the National Grid presumably decides where cabling can connect to the Grid, without any consideration of the consequences for those communities and the landscape in between those two points.

Right now the Planning Inspectorate is examining two wind farms (Norfolk Vanguard and Hornsea Three) which will cross each other in the centre of the county to the East of Reepham - and together they will create considerable disruption over an extended period, with the central point bearing the brunt of both.

It points to a complete lack of joined up thinking and also a lack of respect for the host county which faces more wind farms in the future. It is hoped that these examinations will highlight the flawed approach and lead to more responsible allocation in the future.



# The Rt Hon Norman Lamb MP

Member of Parliament for North Norfolk

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Sarah Richards  
Chief Executive, Planning Inspectorate  
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2 The Square  
Temple Quay  
BS1 6PN

*Please quote our reference in all  
correspondence with this office*

Our Ref: NL28665-JK

31 August 2018

Dear Sarah Richards,

## **Re: Vattenfall - Norfolk Vanguard Offshore Windfarm**

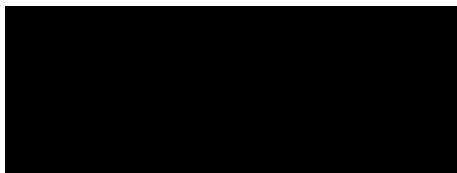
I write following a discussion I have had with my constituent, Beverley Wigg, who has been responsible for communications for the organisation "No 2 Relay Stations" (N2RS).

I enclose a copy of the submission made by N2RS to the Planning Inspectorate in respect of the Vattenfall wind farm application. I was delighted the decision of Vattenfall to opt for a HVDC power supply through the cable and I know that N2RS share this view and make this clear in their submission.

The key point that I wanted to reinforce was that there is strong support for HVDC locally but any variation from this would be strongly opposed. My understanding is that Vattenfall are now only proceeding with HVDC and that it would not be possible for them to substitute an AC alternative at this late stage. I hope that this is the case and I would appreciate reassurance on this point.

I look forward to your full response as soon as possible.

Yours sincerely,



**The Rt Hon Norman Lamb MP**  
**Member of Parliament for North Norfolk**  
*Dictated by Norman Lamb*