

From: Jenny Smedley [REDACTED]
Sent: 29 January 2019 09:52
To: Norfolk Vanguard
Subject: Application for late entry

Dear Planning Inspectorate

We apologise for the delay in sending this in, but hope you will allow it, as we, ordinary members of a farming community are not used to dealing with such issues and legal protocol as is required for us to keep up with during this examination process. This is exacerbated by the fact that we are not able to afford the backing or guidance of solicitors and barristers in any but the most basic of ways.

One of the main concerns from people in Necton is the lack of attention or consideration given by Vattenfall to viable alternative site for their substations.

2 alternatives were offered to Vattenfall

1. Top Farm, Necton, offered to Vattenfall by the owners. It is quite close to Vattenfall's chosen site, but has many advantages:

Direct access off A47

No circular route down to Vanguard and Boreas and then back to the A47 on the other side of Dudgeon and across to NG.

No destruction of Dudgeon's landscaping.

Hardly any mitigation needed.

No 100 metres of mature hedging needing to be removed.

No rare bats

No plane crash.

No Archaeology

No CPO

No ruination/severance of Necton Farm

Better/alternative incoming cable route possibilities.

Acceptance from Necton Community.

This site was offered to Vattenfall by [REDACTED], the owner, also suggested to Vattenfall by Necton Parish Council, Necton Substation Action Group and several residents. I have attached a map with Top Farm shown in green near the top of the map. It is not on the open market as the owners do not want to sell it to the general public, only to the developers, as the willingness to sell is purely to get this development into a suitable place for the good of the whole community. Mr Hill has said that because of the low land and because of an unusual density of tall trees, no-one will see it. Ruari Lean (Vattenfall) claimed at a meeting with us, the Parish Council, and George Freeman MP that they could not use it because there are pylons on the land. (From the same line they are planning to use) Yes there are 3, but pylons will be moved and increased for the proposed NG extensions, so why shouldn't the pylons on Top Farm be made suitable? The pylons mean that the NG extensions could also be built there. Ruari Lean also said Fransham would hear the substations from there – however, Fransham is no closer to this site than Ivy Todd is to the current site, and Vattenfall insist that they will be below noise restrictions there.

Environmentally and economically Top Farm appears far superior to Necton Farm as a site for the substations.

2. Open, sparsely populated land near to Scarning, where there was a large farm for sale on the open market, adjacent to the same pylon line that runs to Necton, and next to where Vattenfall plan to cross the A47 with their cable corridor. I have attached a report on this option, commissioned and paid for by Necton residents for your interest. This report was totally ignored by Vattenfall, and they never responded directly to its author.

We believe that environmentally and financially this site would be better than Necton Farm, further down the corridor and also surrounded by communities.

Regards

Jenny Smedley (for Necton Substation Action Group).

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27 October 2017

Our ref: NSAG

BLB Utilities provides advice and guidance for all consent matters surrounding the Electricity Industry. Having worked within the industry for over 30 years we are uniquely placed to give independent information relating to new consents, wayleaves, easements compulsory orders, compensation and equipment relocation.

Now working for landowners and companies across the UK since 2012 we have been successful in many cases when representing individuals and businesses when powerlines were an issue.

We been instructed by the residents of Necton Village (NSAG), Norfolk, to investigate the Vattenfall proposal to construct a Grid connection site in association with the proposed wind farms being constructed off the Norfolk Coast.

National Grid has a Statutory duty under Schedule 9 of the 1989 Electricity Act to mitigate the effects of any new substation site. They have published a document, NGC SUBSTATIONS AND THE ENVIRONMENT: GUIDELINES ON SITING AND DESIGN which is available to view on their web site.

The Vattenfall project involves the construction of two 1800 MW (1.8GW) off shore wind farms. A cable route from the on shore connection point will require the commissioning of a new 400kV grid site to link into the National Grid network. In 2016 an area of around 3km radius centred on Necton was highlighted. Vattenfall suggest this location was selected to minimise the cable length from the on shore connection point, plus other technical and economic reasons. The on shore cable route length is approximately 50km. The new Norfolk Vanguard substation site is to be around 18 acres in size. A second substation site is also required for the Norfolk Boreas off shore wind farm, again around 18 acres in size. The total is therefore equal to around 24 football pitches.

NSAG have presented an alternative location for the proposed substation site to the south of Scarning around 4km away from the preferred site. This site has been rejected by Vattenfall on what looks like a cost basis reason associated with the need to construct a new National Grid 400kV transformer site, if not built adjacent to the existing National Grid site. They also mention there is not a strong environmental case for selecting the Scarning site. The scheme is part of the £2.5 billion East Anglia Off Shore Wind Farm development zone.

From reviewing the information passed to me along with studying the official links on the Vattenfall website it would appear that the position of the new sub site was probably decided some time ago in the early concept days of this project. National Grid plan their scheme years ahead for obvious reasons and a proposal such as the Necton sub site would no doubt have been on their radar a long time ago.

However, it is reasonable that the compelling evidence we have seen, thus far, should be taken in to consideration during the next stage of this process. It must be investigated in depth and any rejection would be challenged. The Project Manager for Vattenfall has asked for feedback and asked for more. However communication back to contributors, we have been advised, is lacking or non-existent.

NSAG have produced key information to the developer that has been dismissed without, what looks like, serious consideration. BLB Utilities believe that Vattenfall and their appointed consents consultants have a duty and obligation to reconsider the alternative location without falling back on their comment it would cost more. As has been rightly pointed out the proposed site at Scarning is on the cable route corridor to Necton and would reduce the initial cable length to the alternative site. However, Vattenfall have rightly pointed out that a new 400kV substation site would be required at Scarning, as opposed to using the existing apparatus at the already established National Grid site near Necton. We are unsure if the project has looked at the possibility of utilising the 400kV tower line circuit that runs across farm land, that could be used to link a site at Scarning and the existing Necton Grid site. This would avoid an underground cable route between the two sites.

The current proposal requires two large extensions to the existing National Grid site at Necton (Dudgeon Site), one for each of the new wind farms. These we understand require an additional 21 acres (another 14 football pitches).

This whole new development along with the existing site, plus tree screening could amount to half the size of Necton Village.

Vattenfall can apply for a Development Consent Order, granted by The Department for Business Energy and Industrial Strategy, which would give them permission to carry out the works they require associated with the project. This would happen when they are unsuccessful in obtaining voluntary consents for their proposals. As one can imagine this occurs often as it is rare all the affected landowners agree to a voluntary consent. BLB Utilities have a National Grid scheme in Kent at present where the DCO was granted in August 2017 and they have begun constructing the steel pylons already.

If no voluntary consents are granted the developer will be pushed into seeking a DCO. This would show that although it is acknowledged that a DCO could be granted the landowners are not content with the scheme as it is planned. This would also force Vattenfall to seriously consider alternative locations for the substation in the Necton/Scarning area. If land is available on the open

market now, not being sold at a premium Vattenfall would have an obligation to contemplate substitute sites.

One matter than needs more investigating is the new tower/overhead line proposals for the Necton / National Grid site. Greater detail is needed. It could be that if a NG L12 termination tower is required this could be up to 50m tall (164 ft.). Even a “smaller” L6 tower could be around 30 – 40m tall (approx100ft.). We recommend that additional information regarding this apparatus is requested as the towers would dwarf the new sub site extension with no real possibility of screening.

It has been rightly pointed out there is a farm consisting of around 168 acres at Scarning on the market being marketed at £1.42m. The location is appropriate and has good road access. It is possible the land could be purchased by the developer, built out with the site they required. Once the project is complete, or even during the project, they could sell the remainder of the land that is not required.

The benefit to the developer and the project is that a key asset would have been acquired and one less Compulsory Acquisition would be required. They would also be looking at purchasing on the open market as opposed to the possibility of paying an enhanced figure to secure a site elsewhere.

BLB have requested details of this sale to check the extent of the land boundaries and how this could fit in with the proposed cable route towards Necton. Looking on the Land Registry web site there are many titles and consequently difficult to ascertain the exact plot, all 68 hectares, for sale.

However, the land sale details are now attached.

BLB Utilities would advise that this avenue is the best angle to pursue and to press the developer and National Grid to consider. They would need to show they have reviewed their whole project in this area and assess the benefits of acquiring a site at Scarning and making the underground cable link to the existing Grid Site, as opposed to a possible Compulsory Purchase at Necton.

We have been advised that NSAG raised the alternative site option early September, with Parish councils also raising the question shortly after. Both request asked for a report explaining why the alternative site was not considered appropriate. The PEIR information seems also to be lacking in clarification as to why the alternative sites had not been seriously considered.

We also understand that Top Farm could also be considered, and although nearer Necton this site has not be followed up. It is appropriate that the reasons behind this rejection are made public. Site plan attached.

BLB Utilities have spoken to the appointed agent at Consent Solutions to advise that we have been instructed by NSAG to assist in getting the developer to look at alternatives, whether this be the Scarning option or other locations.

BLB would be more than pleased to work with NSAG in pressing the various points through their contact at Consent Solutions. Knowing the appointed agent personally from working with him in the Electricity Industry many years ago, we

would hope is an advantage as opposed to communicating with a large faceless company where emails would probably go unanswered, BLB Utilities would suggest that although Vattenfall say they like individual emails and communication relating to their proposals it is often better to have a coordinated response to ensure the facts are set out in a professional and rational manner.

We have also spoken to the Project Manager recently who indicated that a report had been released providing detail on the reason the Scarning site was rejected. We, along with NSAG, cannot locate this report as yet.

We fully appreciate the dramatic affect this proposal would have on the village and individuals in the locality, not just during the construction phase but with the ultimate completed site in the future, if built.

To summarise this brief initial report we suggest that further dialogue between BLB Utilities and Consent Solutions takes place very soon to ensure the developers know we have been appointed to assist NSAG.

Encourage any land owners approached by Vattenfall or National Grid not to agree to engage in communication or agree any cable route or land agreements. Advise the Parish Council that BLB Utilities have been instructed and suggest they engage in discussing the options with us.