From:	Jenny Smedley
To:	PINS
Subject:	Second Written Questions
Date:	28 February 2019 09:10:32

2.6 Applicant Paragraph 4.5.3 of EN-1 seeks to ensure that energy infrastructure developments are sustainable and as attractive, durable and adaptable as they can be, taking into account both functionality (including fitness for purpose and sustainability) and aesthetics. 4 Question to: Question: Please explain, in relation to fitness for purpose, sustainability, durability and adaptability, how Norfolk Vanguard has demonstrated good design.

Please can you say say why attractiveness and aesthetics are not included in this question? If they were then the developer's own PEIR Document tells you that this structure (substation) does not fit into its surroundings, and is impossible to mitigate satisfactorily – ie make it look aesthetically pleasing, or attractive.

As to sustainability – this word's definition is: the ability to be sustained, supported, upheld, or confirmed. Environmental Science .
the quality of not being harmful to the environment or depleting natural resources, and thereby supporting long-term ecological balance: The committee is developing sustainability standards for products that use energy.

This project, with Boreas will use approximately 300 acres of land, some temporarily, but most permanently. This project is being built on an island, where land for housing and farming is in short supply and cannot be replaced, and is intrinsically a natural resource that is not sustainable.

For Necton Substation Action Group

From:	Jenny Smedley
To:	PINS
Subject:	Second Written Questions
Date:	28 February 2019 10:19:01

Dear Planning Inspectorate
We would like to add our answer (below) to that of Necton Parish Council, to this question:

https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010079/EN010079-002351-Womble%20Bond%20Dickinson%20on%20Behalf%20of%20Norfolk%20Vanguard%20-%20Responses%20to%20the%20ExA%E2%80%99s%20Written%20Questions.pdf

18.21 Applicant Do you agree with the comments of Necton Parish Council [RR-113] that the extent of the area proposed for the substation involves a land take of Grade 3 agricultural land that doesn't comply with the National Planning Policy Framework or local planning policies? Please provide reasoning for your answer.

An assessment of impacts upon agricultural land is provided within ES Chapter 21 Land Use and Agriculture (DCO document 6.1.21) and the coverage of different agricultural land classification types is presented in Figure 21.4. Within ES Chapter 21 Land Use and Agriculture (DCO document 6.1.21) the threshold for the highest effects is identified as the permanent loss of 20ha of the Best and Most Versatile (BMV) Land – refer to Table 21.6 in ES Chapter 21 Land Use and Agriculture (DCO document 6.1.21). This threshold was defined using NE guidance. The assessment is therefore undertaken on the basis that the loss of more than 20ha of BMV land would represent the highest magnitude effect. Schedule of Responses Norfolk Vanguard Offshore Wind Farm January 2019 Page 128 PINS Question Number Question is addressed to: Question: Applicant's Response: The 2012 National Planning Policy Framework does not set a threshold for the permanent loss of BMV and instead sets out that BMV land is part of the intrinsic value of the countryside and that planning policies should contribute to the natural and local environment by recognising this. Neither the emerging Breckland Local Plan nor the Norfolk Strategic Planning Framework set any threshold for the permanent loss of BMV land. There will be permanent loss of agricultural land at the onshore project substation, which represents approximately 7.5ha (18.5 acres) of Grade 3 agricultural land. There will also be permanent loss of agricultural land at the National Grid substation extension, which represents approximately 3ha (7.4 acres) of Grade 3 agricultural land. The total area of land permanently taken out of production as a result of the proposal is therefore approximately 10ha (24.7 acres), which is not considered significant. The project has minimised impacts on BMV land where possible through embedded mitigation measures in the site selection process. Mitigation measures have also been proposed to minimise impacts on soil quality through the preparation of a Code of Construction Practice and Soils Management Plan (secured through DCO Requirement 20). Additional land is also required for screening/planting, as detailed in ES Chapter 29 Landscape and Visual Impact Assessment (DCO document 6.1.29), subject to detailed design. It is not possible to quantify the exact

volume of land required for mitigation planting, however it is not considered to be a significant area (indicative mitigation planting is shown on Figure 29.10b, 29.11b and 29.12). Private agreements (or compensation in line with the compulsory purchase compensation code) will be sought between the Applicant and relevant landowners/occupiers. With this commitment in place the impacts associated with loss of agricultural land will be minimised.

"Once again Vattenfall have showed that they answer questions in a biased and not always accurate way. The developer first showed disregard for this part of the NP framework by choosing the connection point at Necton. By doing so they forced Orsted to opt for Norwich Main, thereby increasing the acreage lost in cable corridor for up to 10 years by causing both developers to dig longer cable corridors by some distance, and also cross over each other.

They have then created a ridiculous circular route in Necton which begins at the A47 at Top Farm, continues through the entire length of Top Farm as as access road (thereby using up land permanently, and severing the farm – which was, we remind you offered to them for sale to build the substations on), continuing onto Necton Farm, building the substation/s and then cabling with 400kv cables out the other side onto more of Necton Farm's land and back across Necton Farm's land, almost to the A47, parallel to their access road on the other side of the NG substation, and then across Dudgeon's landscaping to the NG substation, which they previously drove right past (on the Top Farm access road) to get to the substations' site.

How can digging kilometres of unnecessary cabling and devastating 2 farms instead of 1, satisfy the NP Framework?

They could have saved many acres of land, first by choosing the correct connection option.

If they did choose Necton they could have saved land by stopping within the boundaries of Top Farm (the land of which is less productive than that of Necton Farm) to build both substations and NG extensions.

Whilst we appreciate that on paper, land cabled through can be used for farming, **we draw your attention to the representation by James Sheringham**, who can tell the truth of what happens to farmland that is cabled through, as he suffered this, and is still suffering it, at the hands of Dudgeon. Photo attached.

Lastly of course Vattenfall show their disingenuousness by stating that they will be only taking 24.7 acres of land permanently for the Vanguard substation.
They do not include the access road, which will run through Top Farm, or the land at Top Farm that will be made inaccessible by this road.
They only vaguely acknowledge a little land being taken for landscaping, which of course

will also be taken out of agriculture, and this should be included.
Their errata states that some land reported as being Grade 3 is actually Grade 3a, but do not specify if this includes Necton Farm and /or Top Farm.

Vattenfall also sweeps aside the double cumulative effect of Boreas following closely behind. They are trying to buy 100 acres of land from Necton Farms.

Necton Substation Action Group