

For the Attention of Gareth Leigh
Head of Energy Infrastructure Planning
Department for Business Energy and Industrial
Strategy
Level 3, Orchard 2
1 Victoria Street
London
SW1H 0ET

Vattenfall Windpower Ltd
Norfolk Vanguard Ltd
5th Floor
70 St Mary Axe
London
EC3A 8BE
Tel: 0800 019 3517
info@norfolkvanguard.co.uk

By email only

20 May 2021

Dear Mr Leigh,

**Planning Act 2008 and the Infrastructure Planning (Examination Procedure) Rules 2010
Application by Norfolk Vanguard Limited for development consent for Norfolk Vanguard
Wind Farm (Norfolk Vanguard)**

We refer to your letter dated 29 April 2021 which seeks further information for the purpose of re-determining the application for development consent for Norfolk Vanguard.

The letter sets out (paragraph 6) a process to remedy any failure to assess the cumulative landscape and visual impacts of the Norfolk Vanguard and Norfolk Boreas projects in the Norfolk Vanguard decision making process, particularly in respect of proposals to locate the onshore substation infrastructure at Necton.

That process would evaluate any harm that might derive from the landscape and visual impacts of locating the Norfolk Vanguard substation(s) at Necton, and the weight to be accorded to those impacts taking into account the cumulative effects with the Norfolk Boreas project.

From your letter we have noted in particular

- (i) that, now that the Norfolk Boreas examination has been completed the Secretary of State (**SoS**) has been able to consider if any further relevant information on the design of the Norfolk Boreas substation was produced during that examination (paragraph 4)
- (ii) that during the Norfolk Boreas examination, Norfolk Boreas amended its Design and Access Statement (**DAS**) to include further information, and the SoS intends to take the DAS into consideration in the re-determination of Norfolk Vanguard (paragraph 5).

Your letter invites representations on

- (i) the procedure which the SoS now proposes to follow
- (ii) whether the examination should be reopened to consider the cumulative landscape and visual impacts at Necton
- (iii) the SoS's assessment of the situation (paragraph 6) regarding additional materials to make the assessment of cumulative and visual impacts in re-determining Norfolk Vanguard

Procedure

We agree that the procedure which the SoS now proposes to follow, as set out in paragraphs 6 and 7, is proportionate, fair and transparent, both with regard to the additional materials and information for the purposes of evaluating harm that might derive from the landscape and visual impacts of the Norfolk Vanguard substation(s); weighing the outcome in the overall planning balance for Norfolk Vanguard; considering any implications for Norfolk Boreas; and, with the exception of this specific and targeted joint consultation, continuing to deal with the applications for Norfolk Vanguard and Norfolk Boreas separately.

Re-opening the examination

We consider that it is quite unnecessary to re-open the examination. For the purposes of the re-evaluation of any harm that might derive from the landscape and visual impacts of the Norfolk Vanguard substation cumulatively with the Norfolk Boreas substation, the SoS can properly and fairly rely on the original and additional materials referred to in paragraph 6.

In particular

- (i) the Rochdale envelope approach has been adopted and the cumulative landscape and visual impacts at Necton have already been fully assessed in Chapter 29 of the Norfolk Vanguard ES [APP-353]. The ES contains visual material on the cumulative impacts as seen from agreed viewpoints, as well as the assessment of those cumulative impacts at those viewpoints
- (ii) representations on cumulative landscape and visual impacts at Necton were made in the Norfolk Vanguard examination, and remain available on the PINS website to be taken into account in the re-determination
- (iii) alternative grid connection points and alternative substation sites have been fully addressed in Chapter 4 of the Norfolk Vanguard ES [APP-328] and in Strategic Approach to selecting a Grid Connection Point [AS-007]. Representations on these matters were made at the Norfolk Vanguard examination and remain available on the PINS website to be taken into account in the re-determination
- (iv) although some affected parties did reserve their right to request a compulsory acquisition hearing, the objections by all those parties had been withdrawn before the SoS's original decision on Norfolk Vanguard was made
- (v) all interested parties were given the opportunity, in open floor hearings, to set out their position on cumulative landscape and visual impacts at Necton, alternative grid connection points and alternative substation sites. Those open floor hearings were recorded and remain available on the PINS website to be taken into account in the re-determination.

Paragraph 6 assessment

We agree the SoS's assessment of the position set out in paragraph 6 regarding both original and additional materials.

We will submit any further representations on the substantive issues as necessary following receipt of the SoS's Statement of Matters confirming the re-determination procedure and those matters on which he wishes to invite interested parties to make further representations.

Yours faithfully



Ruari Lean

For and on behalf of
Norfolk Vanguard Limited