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Sent: 15 May 2021 09:30
To: Energy Infrastructure Planning <beiseip@beis.gov.uk>
Subject: Response from NSAG as requested to EN010079: Norfolk Vanguard Updates

Dear Gareth Leigh

Secretary of State

Necton Substation Action Group 13th May 2021

Following the "REQUEST FOR INFORMATION FOLLOWING THE HIGH COURT'S DECISION TO QUASH THE NORFOLK VANGUARD OFFSHORE WIND FARM ORDER 2020"

Question 1.

The procedure which the Secretary of State now proposes to follow - whether as part of that procedure, he should ask the Planning Inspectorate to reopen the examination to consider the cumulative landscape and visual impacts at Necton.

Answer: YES with reservations as below

Question 2.

Whether Interested Parties agree with the Secretary of State's assessment of the situation set out at paragraph 6.....

Answer: No. Because the only way this will work, to be fair to the residents of Norfolk, would be to rewind the entire DAS and DCO and start from scratch with both projects under the same application umbrella.

Reasons:

Early on we asked the National Grid if, when allocating connection points, they ever considered what was in the area and whether the project (s) would fit. Their answer was a resounding no, and that it was 'up to the developer to do so'. Of course the developer (Vattenfall) could easily see that Boreas and Vanguard together would be rejected by the residents and Parish Council of Necton as being too large for the area, so they came up with a plan.

At the first presentation in Necton they told anyone who asked that Boreas would be years down the line, would be a very small extension...etc. Here are just a few of the statements made by residents who attended that first meeting. They can be provided in a more official format if necessary.

Margaret Woodall, [REDACTED], Necton: *"I do not remember who I spoke to at the first meeting in Necton but when I asked why there were going to be two, I was definitely advised that Boreas would not be as large as Vanguard and would be an add on of around 6.5 acres."*

Edna Greening, [REDACTED]
"At one of the early consultations I wandered around Necton Village Hall looking and listening to various reps. Nearing the end, I came across a large illustration of a 'mock- up' of what the substation in Necton Would look like. I then noticed a small brown box on the end. When I asked Ruari Lean (Project Manager) what it was, his words were 'Oh that's just a small add-on'. SOME SMALL ADD-ON THAT TURNED OUT TO BE!"

Susie Spain: [REDACTED], Necton: *"I was told that because of the Vanguard substation, Boreas would only need to be a small add on. A year later, they quite rudely implied that I had mis-heard but I am certain this is what I was told."*

Jenny Smedley, [REDACTED], Necton: *"I was told that we should not 'worry' about Boreas as it would only be a small add-on of around 6 acres. This was told to me at the first Vattenfall presentation in Necton in October 2016. We found out months later that Boreas was in fact going to be the same size as Vanguard."*

Jean Bass (Chairman Necton PC): *I was told not to worry about Boreas as it was 'light years away'.*

Tony Smedley: *I was told by a Vattenfall representative that Boreas would just be a small extension as it would be using the Vanguard equipment.*

Colin King: [REDACTED]: *At the first Vanguard drop in presentation at Necton, When asked about Boreas which we learnt was to follow the response was "don't worry about that now, it's just an extension we are planning for the future." The sentiment was once Vanguard was built you will hardly notice an extension.*

Vattenfall's plan was to divide the project in two, get the first half passed as a standalone, then push Boreas through very quickly and unobtrusively. The applicant's legal team have stated that if Vanguard was approved, Boreas would 'have to be' because it was just another one the same, the first having set a precedent. This showed their clear intent to misrepresent.

This is also why the previous SofS said there was not enough information on Boreas to consider the projects cumulatively, and that was the developer's intention all along.

The SofS should please take note that the IPs, with regard to Vanguard were largely ignorant of procedure within PINs, and also had no detailed knowledge of substations in general, and Boreas in particular. IPs also had to learn to do representations as they went along. If the entire project (s) were started again as one project, which is in truth what they are, there would be no such disadvantage.

Further, if the projects were applied for from scratch as one single vast undertaking, it could be clearly seen that it was very much too large to be squeezed into Necton.

The project when taken in halves, individually, has been noted by both Breckland Council and the developer's own PEIR document to be out of character with the surroundings. When 2 halves are looked at together, this becomes ever more apparent and unacceptable.

Vanguard alone is proving to be impossible to mitigate by the developer's plan to use small saplings and low banks. Even in 30 years very little would be hidden.

Every single question asked during the 2 examinations needs to be answered again of the entire project, not just half of it.

Therefore we ask that the SofS stops trying to patch this dreadful misrepresentation by the developers and take the project back to its beginning so that a clear picture can be seen and adjudged accordingly.

Staring this massive project again in its entirety would also allow for cumulative effects to be studied such as the traffic implications to other villages.

It would also create opportunities to properly assess the probability of much worse cumulative noise issues, and the cumulative possibility of flooding in an area historically prone to it.

The developer is asked to always state worse case scenarios in these projects, all except in this case the worst possible scenario of all – that is the scenario of every problem flagged by Vanguard being at least doubled by Boreas.

NSAG (Necton Substation Action Group)