

# Necton Parish Council

Parish Office, Necton Community Centre  
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Mr Ruari Lean  
Project Manager Vanguard  
Vattenfall



Parish Clerk & RFO:  
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08 December 2017

Dear Mr Lean,

## Consultation under Section 42 of the Planning Act 2008

This Council has been monitoring the progression of the Vattenfall development project since our first official notification back in September 2016. There have been a number of meetings between representatives of both parties during that time as well as written correspondence. This Council has also engaged with our District, County Authorities and our MP George Freeman.

## Communications from Necton residents regarding this development

The Parish Council has received 20 unique communications from individual residents objecting to the proposed substations. Some of these residents have identified themselves as members of Necton Substation Action Group (NSAG), however there are objections from individuals not associated with the NSAG.

759 residents have signed a petition, managed by the Necton Substation Action Group, expressing their objection to the proposed substations. This figure represents approximately 43% of the residents on the electoral roll. More significantly, this represents 63% of Necton households.

With 1,758 residents recorded on the electoral roll, there are currently just fewer than 1,000 residents who have not declared to the Parish Council a view either positive or negative.

## 1. Consultation process

Vattenfall commenced non-statutory public consultation in October 2016 and conducted a number of events across the county (October 2016, March 2017 and July 2017). This activity went to inform their proposal as presented in the Preliminary Environmental Information Report (PEIR), which was published on 7 November. This PEIR should broadly identify a proposal that has been shaped by the extensive consultation events and accordingly should not be 'a surprise' read. A "No surprises approach" was committed by Vattenfall to the Planning Inspectorate on 13 April 2016.

We make the following points regarding the consultation process:

- 1.1. Four footprint options were first unveiled to identified Necton residents at an event on 19 July 2017. Detailed photo-imagery from viewpoints was available for only footprint option 1 and 4. The PEIR identifies

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footprint 2 as the selected option, but there appears to be little evidence to explain this option over the other options.

- 1.2. The National Grid extension was never adequately identified at any of the public consultation events and the full extent of the extension only came to light within the PEIR. National Grid has a statutory duty to consult and engage and it is our view that duty has not been adequately carried out. This point was raised with Vattenfall management team by this Council on a number of occasions as far back as 24 March 2017.
- 1.3. This Council has received many complaints from residents specifically about the quality of consultation and their perception is that their contributions have not been considered.
- 1.4. Members of this Council, who attended the specially convened consultation event of 19 July at Green Britain Centre, reported that the delivery of the event was unprofessional and chaotic. The programmed schedule was changed, removing the opportunity for questions, there was little acknowledgement of disability needs (poor visuals and no provision for those with hearing difficulties) and the sensitivities of concerned residents was not given due regard.
- 1.5. It is understood that there are residents living in neighbouring hamlet of West End that have not been engaged by Vattenfall in the consultation process. This hamlet lies approximately 1 KM to the south-east of the proposed Vanguard substation.
- 1.6. Vattenfall has acknowledged a number of errors on various consultation documents, which has increased confusion and concerns during the period they committed to engaging with communities.

## **2. The proposal – onshore project substation at Necton**

The Consultation Summary Document Autumn 2017 (part of the PEIR) outlines the project element proposed at Necton – pages 37 to 43. The area map on page 38 is the first indication to this Council of the extent of the two distinct footprints for National Grid and Vanguard/Boreas substations.

### Misrepresentation

- 2.1. PEIR chapter 29, section 29.6.4.1, para 173 states that Ivy Todd is a small village. The correct designation is a hamlet with 63 residential properties. Para 174 of the same chapter and section states that Necton is a small town. The correct designation is a village with an area of 15.48 km sq. and a population of just under 2,000 residents. These errors raise a concern about the accuracy of impact evaluation undertaken within this area. We would wish to see this error investigated and evaluations re-assessed.

### Visual impact & mitigation

- 2.2. Within the PEIR there are many contradicting statements relating to visual impact mitigation and Vattenfall's commitment to early implementation for mitigation is unclear.
- 2.3. The PEIR also states that mitigation planting for the substation will be insufficient to reduce the landscape impact within the operational period. Such an admission is not a satisfactory approach and a clear statement of intention for adequate mitigation (such as 'building wrapping' with woodland scenes) would be necessary before a view on the suitability of this site is possible. This Council's experience with Statoil (Dudgeon Sub-station) on light pollution and a lack of early planting has encountered strong resentment from some of our parishioners.
- 2.4. The combined footprint of the two new sites (National Grid and substations) is significantly larger than initially stated by the developer and the real impact is hard to determine through photomontages alone, particularly as those published have carried a number of errors and omissions. Vattenfall might want to consider some more simple visual effects, such as a display that demonstrates the actual height/density of

the project at both sites. Such a display for public viewing would go some way to understanding the visual impact and would inform a realistic mitigation strategy.

- 2.5. Breckland Council policy states that large-scale renewable energy proposals should deliver economic, social, environmental or community benefits that are directly related to the proposed development and are of reasonable scale and kind to the local area. However, this development as it stands is far bigger than could be construed as a reasonable scale and kind to the local area.
- 2.6. Necton and the surrounding villages are recognised as a dark sky area, a tourism asset. Yet, the PEIR does not provide clarity as to how our dark skies will be protected. We would like to see a clear strategy on Vattenfall's intentions regarding light pollution at all stages of construction and operation.
- 2.7. Such a significant industrial landscape, coupled with inadequate visual mitigation provides a distinct disadvantage to Necton village as a local service centre, with a strategy to increase residential development by approximately 30% within the next 10 years. Full detail of this strategy lies within The Breckland Council Local Plan.

## Noise

- 2.8. PEIR, chapter 25, para 148 states that "noise in the area of the substation is likely to be dominated by A47 road traffic in this predominately rural landscape". Wind direction is a recognised component in sound surveys and this document does not state it has been considered within any actual site analysis. The impact of wind direction is significant in this case. 42% of residents who responded to the Parish Council Resident Survey November 2017, stated 'quiet' as a reason for their enjoyment of living in the village.
- 2.9. At para 109, it states that "human receptors are to be determined during consultation with relevant stakeholders". However, the proposed substation is clearly identified, superimposed on a current ordinance survey standard map and individual residential settlements can be identified and therefore accurately determined. Why has the extensive consultation undertaken by Vattenfall not already determined the nearest human receptors?
- 2.10. Elsewhere, the document states the closest receptor as being 750 metres distant and community infrastructure is more than 1 km from the proposed site boundary. Both of these statements are wrong. The closest human receptors to the proposed substation site reside at a farm, whose boundary is less than 450 metres away. Statutory noise limits state that a person is as entitled to enjoy their garden/ land as they are their house, so a set-back of 400 metres should be built into the noise mitigations, not 750 metres.
- 2.11. Noise pollution is governed by legislation and in this case, Breckland Environmental Health has stipulated specific noise level restriction requirements. We would expect this application to demonstrate compliance before any consents are provided and not before then. Our residents and the wider local community have already suffered the challenge of a lack of policing developments and the limited power of the policing authority on the existing Dudgeon / National Grid substation site.
- 2.12. As there are already, two industrial size substations (Dudgeon/National Grid) in the vicinity the noise levels have already increased against the original background noise survey. The proposed project will increase the size and power of the industrial units by approximately 54.6 acres (27.8. acres without Boreas) almost four times the size and power of the existing substations. Despite this increase, Vattenfall's proposals for noise mitigation in the PEIR only offer the same components used by Dudgeon. This noise level target does not seem possible. As Vattenfall wishes to use the Rochdale Envelope approach, design details are not required until after a DCO. We do not believe this is a satisfactory situation, and noise levels should be proven before the project is allowed to proceed, to avoid the risk of the site once developed not being able to operate without breaking noise thresholds.

## Flood risk

- 2.13. Necton has a well-documented history of flood issues, the root cause lying in the topography of the area. Disturbance to large areas of agricultural land to the north of the village will increase the number and extent of flooding instances within and around Necton and Ivy Todd. The presence of the Dudgeon Wind Farm is already identified as a likely cause for the increase of floodwater running down through Kett's Hill and Ramm's Lane – a matter that the Parish Council is currently discussing with Norfolk County Council Highways and Anglian Water. This is not only run off water, but sewage backing up through interior sanitary units and gardens being flooded with sewage.
- 2.14. Chapter 20, Water Resource and Flood Risk, appears to be crafted simply from desk research and not local knowledge gleaned from Necton consultation events. There is no evidence of current water run-off measurements or other on-site analysis to identify existing water discharge patterns.
- 2.15. The report speaks of 'the connection point' making it unclear if there has been adequate analysis of the two distinct proposed sites – National Grid extension and Vanguard and Boreas substations which are over 700 metres distant from each other. Between them during their approximate 18 months construction period, they will occupy a total of approx. 540,000 sq. metres of disturbed ground.
- 2.16. The proposal does not provide enough consideration of the realistic flood risk impact or mitigation measures to help inform a view as to the suitability of this proposal on these identified sites.

## Highways

- 2.17. Necton is particularly sensitive to A47 traffic flow, as the A47 Necton junction forms the entrance to the village, leading immediately into a 30 mph residential area. Our recent survey of traffic-flow at this junction identified an average of just under 2,000 traffic movements per day in and out of this junction.
- 2.18. Whilst the PEIR identifies entrances to the proposed sites further east of the Necton junction, the consequential impact of increased traffic, wide-load maneuverers and traffic-flow restrictions for proposed new right-hand filter lanes will cause long-term disruption for residents and local businesses.
- 2.19. There is insufficient analysis of the potential impact of traffic to inform our view on this proposal at present. A Transport Assessment and a Construction Traffic Management Plan will form part of the application. The PINS Scoping Opinion (para 3.169) has highlighted our comments with regard to a CTMP. Given the impact poor traffic management along the A47 would have on residents of Necton, we would expect to be invited by Vattenfall to form part of a consultation group focusing on this subject.
- 2.20. With regard to the strategic development plan for the A47 Necton area, this Council has commenced discussions with Highways England on safety improvement measures. Highways England has commissioned a survey that is expected to be complete by summer 2018. Vattenfall accepted an invitation to engage in these discussions, which commenced in September 2017 and we would expect they would continue to contribute to this process.
- 2.21. The Parish Council would support the views of Norfolk County Council in their consultation response, para 2.31.

## Historic sites impact

- 2.22. Chapter 28, figure 28.2 shows that the National Grid Temporary Works Area at Necton will significantly overlap an archaeological site including the recorded area of a medieval moat. We would expect the Developer to alter the works area to ensure there is no disturbance to this site.

## The Rochdale Envelope

2.23. The Secretary of State has stated the EIA process is iterative, and therefore the proposals may change and evolve. For example, there may be changes to the scheme design in response to consultation. Such changes should be addressed in the ES. However, at the time of the application for a DCO, any proposed scheme parameters should not be so wide ranging as to represent effectively different schemes. It is felt that because Vattenfall is proposing two different schemes i.e. HVDC and HVAC, which will not be decided upon until the project construction begins, they are stretching the envelope too far. These two schemes have very wide-reaching difference in their effect on the community in Necton, and the community across Norfolk, and therefore this proposal is in our view breaching The Secretary of State's instructions.

Also, because neither Statutory Consultants nor the public know which scheme will be used, they cannot be expected to give fully-informed opinions within the consultation process.

## Consideration of Parish Council's request for information within the Environmental Statement

The Parish Council submitted a letter to the Secretary of State on 28 October 2016 outlining the information we would wish to see considered and evidenced within a proposal from the developer for this project. The PEIR lacks information on a number of the items we identified as important to this community.

- 2.24. PEIR Figure 30.2 Tourism and recreational assets within the vicinity of the proposed substation site does not identify four holiday-let businesses, yet they are actively trading tourism businesses and they are within 1 km of the proposed site. We asked that a socio-economic assessment of the site, identifying the impact on community infrastructure, local businesses and residents. Omission of four tourism businesses within such close proximity to the site suggests inadequate research.
- 2.25. We also asked for assessments to consider the impact on the local house price index; however we cannot find reference to any such assessment. Recent sales prices of properties in the village have been impacted by the potential new substations.

### **3. Community benefit**

- 3.1. There has yet been no structured communications with Vattenfall about the community benefit this nationally significant infrastructure project might provide to offset the disruption to residents and local businesses. Necton will suffer the most detrimental and enduring impact, with two distinct sub-station sites (National Grid and Vanguard). In addition, Necton will probably endure a further equally similar impact with the addition of Boreas, expected to follow 12 months on from Vanguard.
- 3.2. NCC consultation response, para 2.17 states that "...given the scale of this proposal and potential disruption it may cause to local communities and business that there should be suitable local community benefits arising and appropriate compensation for local businesses."
- Following the completion of the Dugeon substation, Necton was expected to bid for village funding against all town and villages along the cable route. This is totally unjust, as Necton will have a remaining "blot on our landscape" as opposed to other towns and villages being impacted during construction of cable routes, but then return to unobtrusive.
- 3.3. Breckland Council also agree the need for consideration of community benefit and recognise that Necton and its hinterland should receive appropriate compensation in recognition of the significant level of disruption and long-term impact this development will have on that community.

- 3.4. Breckland Council have offered to collaborate with the Parish Council on this matter.
- 3.5. We ask that Vattenfall now establish a Liaison group with Breckland Council and this Council as members to commence discussions regarding community benefit. We would wish to extend an invitation to Norfolk County Council to contribute to this group at various stages during its lifetime, which we would like to be from now until project completion. Vattenfall may wish to establish a road-map for this group.

#### **4. Final comment**

- 4.1. The existing Dudgeon substation is 16 acres and 45 feet tall and is visible to 8 communities and from several major roads. It can be seen from Bradenham Road, it can be seen from as far as Ashill Common, it can be seen from the outskirts of Swaffham (approximately 4 miles away), and on the tourist route along the A47. It is a significant industrial landscape in a primarily rural environment.
- 4.2. We understand that National Grid are duty bound to offer sites with existing infrastructure in the first instance; however, should the connection point offered be unsuitable for some material planning consideration, (e.g. noise limitations, lack of space, changing the character of an area, etc) an alternate connection point should be considered. As noted in our comments above, we have concerns about the suitability of this identified site as the location for more substation infrastructure.

Yours sincerely,

Gabrielle Joyce  
Clerk to Necton Parish Council

CC: Mr George Freeman, Member of Parliament for Mid-Norfolk  
Mr Mark Kiddle-Morris, Ward Member Norfolk County Council  
Mr Nigel Wilkin, Ward Member Breckland Council  
Mr Jon Berry, Project Lead Officer, Breckland Council  
Mr Stephen Faulkner, Project Lead Officer, Norfolk County Council