

# Norfolk Boreas Offshore Wind Farm Position Statement on Early Involvement of a Design Review

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*Photo: Ormonde Offshore Wind Farm*

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## Glossary of Acronyms

DAS	Design and Access Statement
DCO	Development Consent Order
NIC	National Infrastructure Commission

## 1 Introduction

1. During Issue Specific Hearing 5 on the draft DCO and other matters held virtually on Friday 24<sup>th</sup> July 2020, the following action was identified by the Examining Authority;
  - Action Point 11 - Respond to securing early involvement of a design review e.g. in the Design and Access Statement (DAS) in line with NIC recommendations, to consider design approach across the proposed substation area at Necton.
2. In response the Applicant has considered the early involvement of a design review as part of the design process for the onshore project substation at Necton and how that could be secured. This position statement sets out the factors considered and the resultant Applicant's position and proposals to secure.
3. The design review process is only applicable to the onshore project substation not the National Grid substation extension. The design and requirements of the National Grid substation extension equipment is pre-determined by international electro-technical standards, and by National Grid's own technical specifications. Therefore due to the functional nature of the infrastructure there is no opportunity for design flexibility. The Applicant refers to the Issue Specific Hearing 5 Action Points Tracker [ExA.AS-1.D13.V1] where it has responded to Action Point 13 on potential avoidance of reflective material on the National Grid substation extension.

## 2 Consideration of Design Principles

4. The final design of the onshore project substation will be subject to a detailed design phase which will occur post-consent. In order to minimise visual impacts as far as possible, the appropriate building design and materials will be considered, subject to functional requirements, to ensure blending with the local environment. The DAS [REP7-005] Table 4.3 sets out the design principles to be followed to guide the detailed design.
5. The DAS [REP7-005] (Section 2.2. Guidance), also states that the project design will take into account the National Infrastructure Commissions' Design Principles for National Infrastructure (National Infrastructure Commission (NIC), 2020) and would look to use these principles to guide the project design. Within the NIC guidance, reference is made to the use of design review panels on nationally significant infrastructure at an early stage, to shape project design. As part of this position statement further consideration has been given to whether a design review at an early stage and the use of an independent design review panel would be appropriate for this particular project.

### 3 Early Involvement of a Design Review

6. A key concern regarding the design of the onshore project substation, as identified at all stages of stakeholder and community consultation, is the potential visual impact of the substation buildings in views from the local area. In response to these concerns, the approach to detailed design must ensure that these buildings are designed to be as discreet as is practically possible, in order to mitigate against the potential visual impacts. This would require a responsive approach, taking into account the specific attributes of the local environment. As such the Applicant intends to undertake a design review process at a local level, by engaging with Breckland Council as the local planning authority and other local stakeholders. This is detailed and secured in Section 5.3.6 of the DAS [REP7-005]. This would ensure the design review process draws on the local knowledge and experience of the district council and local people, as well as enabling them to contribute to a detailed design which, should the project proceed, will form part of their local environment.
7. In line with the recommendations of NIC, further consideration has been given to the use of an independent design review panel such as the Design Council. Ultimately, the onshore project substation converter buildings have specific functional requirements which must be adhered to, in order to fulfil performance, quality and safety standards. These functional requirements limit the scope to explore design alternatives, such that the colour and texture of materials presents the greatest scope to explore alternatives – the choice of colours and materials having an influence on the potential visual impacts of the buildings. This limited scope, in terms of the design of the substation buildings, would limit the potential input of the design review panel.
8. Furthermore, a design review panel may not share the objectives of local council officers and local stakeholders who are keen to ensure the onshore project substation buildings are as discreet as possible. A design review panel may wish to explore options to make the substation buildings a more prominent feature in the local landscape, whereas for Norfolk Boreas, the agreed intention is to ensure that the substation buildings are as discreet as possible. It is therefore considered, given these particular circumstances, that it would be more appropriate to keep the design review and consultation surrounding the detailed design of the onshore project substation buildings to a local forum involving the district council and local stakeholders, rather than an independent design review panel.
9. However, the Applicant acknowledges the need for early involvement in the design review at a local level to ensure it provides an opportunity for local knowledge and feedback to be incorporated into the early stages of detailed design and changes to be made where appropriate.

#### 4 Securing Early Involvement of a Design Review

10. The DAS Figure Plate 4 sets out the design review process for the development of the design of the onshore project substation and identifies that once the provisional details on layout, scale and design are developed then consultation will be undertaken with Breckland Council and local stakeholders to gather feedback and incorporate any changes prior to the submission of the final designs for the approval and discharge of the DCO Requirements. The Applicant is committed to ensuring suitable time is given to the design review process at an early stage to enable it to inform the final detailed design. As such the Applicant proposes to review and update the design process as detailed in the DAS and add further steps committing to an 'early review stage' to allow early involvement in the design review. An updated DAS will be submitted at Deadline 14. The Applicant will also seek to engage with Breckland Council on the proposed updates to the DAS.

#### 5 Applicant's Position

11. The Applicant is committed to undertaking a design review at an early stage to inform the final detailed design and proposes to update the DAS to secure this commitment. However, the Applicant considers that any design review would be best conducted in a local forum involving the district council and local stakeholders, rather than through an independent design review panel whose objectives may differ from local stakeholder aims to ensure the onshore project substation buildings are designed to be as discreet as possible. Furthermore, the functional requirements limit the scope to explore design alternatives for the onshore project substation and this limited scope, in terms of the design of the substation buildings, would limit the potential input and outcomes of an independent design review panel.