

NECTON PARISH COUNCIL RESPONSE TO BOREAS PINS
5th ROUND QUESTIONS Deadline: 25th August 2020

Q5.9.5.5. Independent Design Review for substations

In light of comments received at OFH2 [EV12-002] and OFH3 (Necton Session) [EV13-011], the decision on Norfolk Vanguard, which gives greater certainty to Scenario 1, and the ExA's ongoing concern about the complexity and detail contained in post-consent approvals for R16 and R18, the resource constraints of Breckland Council and the statements in the NIC Design Principles, the ExA invited the Applicant to consider inclusion of an independent design review at an early stage in the post-consent design process for the substations area, including those for Norfolk Vanguard if appropriate. The Applicant has set out its reasons for not involving an independent design review but has committed to amending the DAS to include a design review at an early stage conducted in a local forum [REP13-018].

Do you:

- a) Agree that an early design review should take place?*
- b) If so, do you consider it should be conducted in a local forum or as an independent design review – or both?*

Necton Parish Council fully support an independent design review and would prefer it to any local forum(s) run by the applicant.

We have experience of previous local forums held by the applicant. No discernible actions or changes happened as a result of local concerns raised or opinions given and therefore an independent design review would be our choice.

Necton Parish Council will contribute to the best of our ability to any reviews or forums arranged by the applicant.

Q5.9.5.6 Independent Design Review for substations

The ExA is consulting on ways potentially to secure the input of an independent design review and invites without prejudice comments on inclusion of wording in the Design and Access Statement (DAS) and/ or the dDCO as follows:

DAS

[REP7-007, Para 67]

The Applicant will engage with Breckland Council and at an early stage with an independent design review panel to review the mitigation and landscape proposals and the architecture of the convertor building of the onshore project substation, at the time when further detailed design information is available. This will be undertaken through the production of a Design Guide.

AND

[REP7-007, Appendix 1, first para]

The Design Guide will be prepared by Norfolk Boreas Limited (the Applicant) and will combine input from specialist consultants and take on board findings as appropriate from the independent design review panel. This part of the Norfolk Boreas project will enable the team to undertake the detailed design of the onshore project substation and ensure that embedded mitigation is integral in this process. The Design Guide will be presented as an A3 document, and will combine text and figures to explain the proposals

*OR
inclusion of additional wording at R16(3) to read:*

"The onshore project substation must be constructed in accordance with the details approved by the relevant planning authority, which must also have been subject to an early independent design review."

*OR
Both the above.*

Necton Parish Council (NPC) have been concerned throughout the examination process for both Vanguard and Boreas that the applicant has no intention of adequately mitigating the infrastructure that is planned to be constructed at Necton. No costings have been produced for the mitigation requested by NPC, just a refusal.

The phrase "... ensure that embedded mitigation is integral in this process... is something NPC have been asking for. The AND paragraphs is therefore our preference.

However, NPC is still concerned that a design review will make recommendations that can be ignored by the applicant / Breckland Council. Is the ExA certain that this wording will ensure that all the independent design review recommendations will be implemented?

Q5.9.5.8 Design and Access Statement and Outline Landscape and Ecological Management Strategy

The Applicant will submit an updated DAS and an updated OLEMS at Deadline 14 (25 August 2020) at the same time as responses to these written questions.

- 1. a) You are requested to submit any comments you may have on the Applicant's updated DAS and/ or the updated OLEMS at Deadline 15 (1 September 2020).*
- 2. b) If you have any comments on the way the Applicant has interpreted the ExA's questions above include these.*
- 3. c) If you consider any wording needs changing provide suggested alternative wording.*
- 4. d) If you think there are ongoing omissions set out what these are and how they can be remedied.*

Noted.

Q 5.9.6.1 Provision for Design Review:

Comment on the Applicant's Position Statement Early Involvement of Design Review [REP13-018].

NPC understands but does not agree with the conclusions given in REP13-018. The applicant seeks to remove qualified independent design consultants from the review. This could limit their obligation to provide adequate embedded mitigation.

In addition, the applicant's response REP13-08 immediately removes the National Grid (NG) substation from the design review. NPC believe that mitigation of the highly visible and very reflective NG infrastructure is just as important as that for the enormous substations. The applicant has already responded that the NG equipment will not be painted or changed in any way from that already present in the Dudgeon substation which can be seen for miles.

NPC would like mitigation of the NG infrastructure to be included in an independent design review, the implementation of whose recommendation in their entirety form a requirement of the Design and Access Statement.

Q5.16.0.1 SoS Decisions and letters regarding other NSIPs

The Applicant has set out its view on the implications on the Proposed Development of the Norfolk Vanguard decision and the SoS Hornsea Three letter [REP13-025]. Points were also made at ISH5 [EV14-004].

- 1. a) Provide the ExA with any views you have which do not accord with the Applicant's opinion as set out in the above document and particularly Appendix 2, which sets out the relevance of the SoS Norfolk Vanguard decision on the Proposed Development, topic by topic.*
- 2. b) Any other matters arising as a result of the SoS Decisions and letters regarding other NSIPs, which you wish to draw to the ExA's attention should be set out here, stating implications and actions you would wish to see.*

The applicant has avoided consideration of cumulative visual impact by splitting their wind farm DCO applications into two halves, Vanguard and Boreas. The applicant's contention was that a) insufficient information was available for the Vanguard application so cumulative visual impacts could be ignored and b) that Boreas cannot come to different conclusions than Vanguard so must pass without additional requirements for mitigation of the cumulative visual impact.

This is being challenged through the Judicial Review process which is currently at an early stage. If successful, NPC would like to ensure that sufficient mitigation controls are in place for Boreas.

Necton Parish Council
21 August 2020