

From: [REDACTED]
To: [Norfolk Boreas](#)
Subject: HHPC response to applicants REP15-015 Julian Pearson. for Deadline 16
Date: 21 September 2020 10:57:38

Dear Examining Authority,
Having read the applicants response to Deadline 15, I submit the following comments on behalf of Holme Hale Parish Council (HHPC).

With regard to the applicants response to Q5.9.5.5 .. We fail to see the relevance of the applicants response. The question asked, was did we wish to see an independent design review, or local stakeholder design review, or BOTH.. the applicant has chosen to simply repeat their original position. Was the question a genuine choice? Or is the applicant hoping that it's position will be supported, simply by repeating it?

By conducting both, the Independent Design Review lacks any emotional bias which might be reflected in the local stakeholder input, whilst the local stakeholders can highlight what most concerns them about proposed mitigation measures, or lack of them, in certain areas. History at Necton substation site has shown, through the Dudgeon build, how a mitigation plan agreed only with the local councils has been unilaterally changed by the developer and mitigation significantly reduced - to virtually nil.

With regard to the applicants response to Q5.9.5.6 We quite agree that the design GUIDE is to set out the design approach and mitigation measures.. but the applicants claim to have addressed the Horlock rules in Table 4.2 of the Design and Access Statement (DAS) [REP14-014] Is cursory at best and does NOT address the specific notes I mention in my response.. (It was because of the lack of detail in that table that I made that request on behalf of HHPC) the 2nd and 3rd rows of table 4.2 address section 3, paragraphs 8 and 9.. only the first row refers to paragraph 7 and that simply mentions the increase of tower numbers and the height of the convertor buildings and lightning mast.. there is simply nothing addressing the following 9 'notes' within section 3 Paragraph 7.. remember that these were drawn up as a 'guide' document, by National Grid themselves. Given the proposed size of Boreas, it is vital that the design GUIDE identifies how it's approach and it's mitigation addresses each of these.. simply stating tower and building heights does nothing... a 19m tall building is hardly respectful of note #1, but if the reasoning is technical, then notes 3,4 and 6 should be addressed in their approach to mitigate that.

- Notes:
- 1 With outdoor equipment, a preference should be given normally to a low profile design with low height structures and silhouettes appropriate to the background.
 - 2 Use lightweight narrow section materials for taller structures especially for gantries over about 6 metres in height.
 - 3 Commission exterior design and colours appropriate to the surroundings.
 - 4 Materials and colours for buildings, equipment and fencing should be chosen to harmonise with local surroundings.
 - 5 Where possible avoid the use of prominent insulators by consideration of available colours appropriate to the background.
 - 6 Where possible site buildings to act as visual screens for switchgear.
 - 7 Ensure that the design of high voltage and low voltage substations is co-ordinated by early consultation between NGC and its customers.
 - 8 Where there are particular technical or environmental constraints, it may be

appropriate to consider the use of Gas Insulated Switchgear (GIS) equipment which occupies less space and is usually enclosed within a building.

9 Early consideration should be given to the routing of utility service connections.

As a consequence, HHPC disagrees with the applicants comment that "...no additional wording is necessary". The applicants persistent refusal to put forward any approach or measures, outside of the planted landscape is considered by me, as evasive at best.

With regard to the applicants response to Q5.16.0.1 , We fully understand that the finer detail of mitigation cannot be completed until the design of the substation is completed, but the principles and approach (Design GUIDE) should have been part of the early consultations and not deferred. HHPC does not see what significant changes there would be to a design, were the applicant to commission that part now, especially having committed to HVDC some time ago... if we accept a deferral of the design 'REVIEW' until post consent, then the applicant should at least submit a full design GUIDE, before consent is granted, addressing each element of the substation and how the notes listed above have been considered. e.g. Buildings, switch gear and other infrastructure and what approach will be taken to minimise their impact, perhaps even with some options on colours, patterns, materials, etc... there is a danger that having commissioned a designer, via a supplier, the applicant will 'pass the buck' and blame a 3rd party supplier for restricting mitigation by their design, where the design should be directed by the mitigation approach and measures required. At ALL times, the applicant MUST retain the responsibility for appropriate mitigation, agreed well in advance, irrespective of whom they contract or sub contract the design elements to.

Best regards

Julian Pearson

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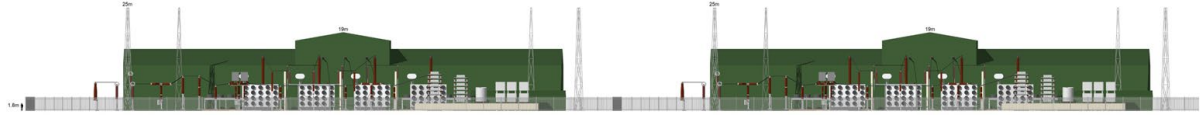
From: [REDACTED]
To: Julian.Pearson@FAOBO.org.uk
Subject: Applicants response to Q5.8.5.3
Date: 24 September 2020 15:59:05
Attachments: [Screenshot20200924155905.png](#)

Dear Examining Authority,
Further to my earlier response for deadline 16.

Q5.9.5.3 From the ExA, specifically requests the applicant produce drawings and sketches of the proposed substation and to include (see item b) a common element of scale.. e.g. a person or a double decker bus

as EN010087-002451-8.3 Design and Access Statement (Version 5) (clean) paragraph 58 on Pages 19 and 20 provide the imagery, but fail to provide a commonly element of scale as requested by the ExA., on any of the representations of the whole Boreas s/R.

The ONLY such scale I was able to find... and I had to look hard, was on page 5 of the Preliminary Design report, where a single figure can be seen in the bottom left hand corner of a single 'module'. i.e. one convertor building with it's respective controller building and external switchgear, and NOT in any drawings where the whole of Boreas is seen (let alone the combined Vanguard/Boreas development)... in effect this 'halves' the effect of the scale. .. I have therefore duplicated their drawing below and added the second building, to put the human figure in the bottom left, in true context with the proposed development of Boreas



In paragraph 75 Plate 4 on page 24 of EN010087-002451-8.3 Design and Access Statement (Version 5) (clean), the sequence of events is clearly shown as contractor appointment, Provisional layout, scale and design, and THEN the design guide, written during the design.

In the applicants response REP15-015 Section 1.10 row 2 of the table, they make the following statement "The purpose of the Design Guide is to set out the design approach and mitigation measures to be applied in respect of the onshore project substation" but how can this be possible, if the preliminary layout, scale and design is to be completed first?

This smacks of writing the guide to fit the design, instead of using the guide to direct the design approach and the mitigation to be considered

By the time the design review is undertaken with the stakeholders, we are left with the crumbs and potentially a limited choice... the historic behaviour of the applicant is to choose the comment that most closely fit it's own intentions, irrespective of how few people make such a comment... as was the case with determining the site option, because a couple of people said 'as far away as possible', whilst many more promoted other LOCAL VALID sites, including the dip at Top Farm, through which the access road is to be cut. Whilst that boat has sailed, it set a deep mistrust in the applicant.

The Preliminary Design Report is welcome but is again limited in the scope that it covers. I have long since pushed for an independent, professional specialist to advise on the reduction of the visual signature, using colour, materials, hard landscape and planted landscape combined, but it would seem that the applicant is yet again side slipping that responsibility and setting up a fete accompli to get rubber stamped, or adjusted within parameters that won't affect the structures (e.g. offering a standard colour choice of steel sheets to clad the buildings) and permitting the local community to select tree species.. when the reduction in visual signature is a complex combination of many factors and should not be limited to a narrow scope design report, controlled guide and subsequently limited mitigation plan.

Best regards

Julian Pearson
FAOBO Holme Hale Parish Council