

**From:** [REDACTED]  
**To:** [Norfolk Boreas](#)  
**Cc:** [REDACTED]  
**Subject:** HHPC response for 20th August deadline  
**Date:** 17 August 2021 06:39:01  
**Attachments:** [17F4143B566A44658FAAC969683FB22E.png](#)

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## 8.27 Onshore Project Substation Masterplan

F&OBO Holme Hale Parish Council

I have read the response shown above and have the following statement to make in reply:

The applicants stand remains unchanged: they have simply reiterated they are creating an approach to make a plan (in future).

1. In summary, The High Court overturned (Vanguard) consent due to the applicant presenting an application that they knew would have a significant impact but whose 'new design' was sufficiently unclear to define any realistic mitigation. As a result of this, nobody, including the Secretary of State, is able to truly determine whether such mitigation measures would be sufficient.
2. The wording of 8.27 makes it appear that they have made serious considerations for the approach, but they almost immediately go against the 'Horlock Rules' which are the industry standard for substation design. (relevant section copied and pasted below)
3. The applicant states:

*"Zoning of the onshore project substation footprint to locate the convertor buildings in the northern zone of the onshore project substation footprints..."*

The Horlock rule notes of Section 3, subsection 7..note 6.. clearly requires the buildings to act as a screen from the outdoor switchgear, but with Necton Woods to the north of the substation, and the applicant's proposal to site the 19m tall convertor buildings to the north of the site, it means the switchgear will be completely unshielded from view for anyone looking towards the development from the south & south east.

There is no explanation to justify why they have gone against the Horlock Rule guidance, though a verbal response to a challenge to this decision, was that it was because the cables came in from that side.. We see no reason the cables could not continue underground to anywhere within the site, releasing the designers from that constraint.

4. Later in the Norfolk Boreas response, they refer to "The Design Guide (as detailed in the DAS, REP14-0014)"...

...but there is no such guide. It is a document they INTEND to write, even though the National Grid already wrote a standard design guide, - 'The Horlock Rules' to which we have already referred.

The schematic from that section of the document clearly shows that provisional details of layout, scale and design will be determined BEFORE their design guide is written... this allows the applicant to make their design guide fit the layout & design and NOT, as it should be, for the layout and design to fit the design guide.

5. In addition there will be 'specified options'... so a limited choice... that puts the responsibility on the 'stakeholders'; this is a body that is not clearly defined, nor is the process of determining who the stakeholders would be outside of the fixed authority of Breckland District Council - a bit like Henry Ford's supposed statement "You can have any colour you want, so long as it's black".

Thus, the applicant will put forward a fixed and limited choice to matters that they may well have already determined anyway..

6. The Design Guide parameters give all the inference of consultation, but these are matters that should have been completed BEFORE the planning process was even started and not deliberately deferred until after DCO consent, when matters can be easily changed as was done with the Dudgeon substation which has resulted in a development just 1/12<sup>th</sup> of the Vattenfall substation size, being clearly visible from several miles away, still with just knee high planting, 10 years after construction began.
7. The DAS, REP14-0014 has already pre-determined that the finish will be sheet steel and has put up representations of a fixed palette of colours.. a selection of 'least horrifying' as opposed to 'best solution' (as could be determined by the commissioning of a visual mitigation specialist). There is no mention in the 'cons' section for 'Metal Sheeting' of the potential for panels of metal sheets to be blown off - like has happened several times at Duxford aerodrome main building - and causing issues with the electrical components in the open ground switchgear... remember this is the highest point in the area! This demonstrates again that the pros and cons have been listed to suit the applicant's predetermined choice.

#### To sum up

All we have ever asked for, is that the applicant commit to specific and clear decisions that can be properly assessed in consideration of the impacts those decisions will have. Only in this way can a fair assessment be made as to whether the application should be granted. The applicant has consistently evaded making any such decisions in a "Grant consent and trust us" approach.

Vattenfall have not yet been able to convince us that they can be trusted not to manipulate 'consultation' outcomes to fit their predetermined intentions, as has been apparent from the choice of site location, despite so much objection to it being placed at the highest point in the chosen locality, though they claim (in earlier statements) this position was the preference of the locals in consultation.

We therefore ask, yet again, that the applicant be required to complete the design guide, then the design and layout of their substation, together with full, appropriate mitigation proposals as a formal part of their application. Until that is completed, then the same grounds exist for further High Court action.

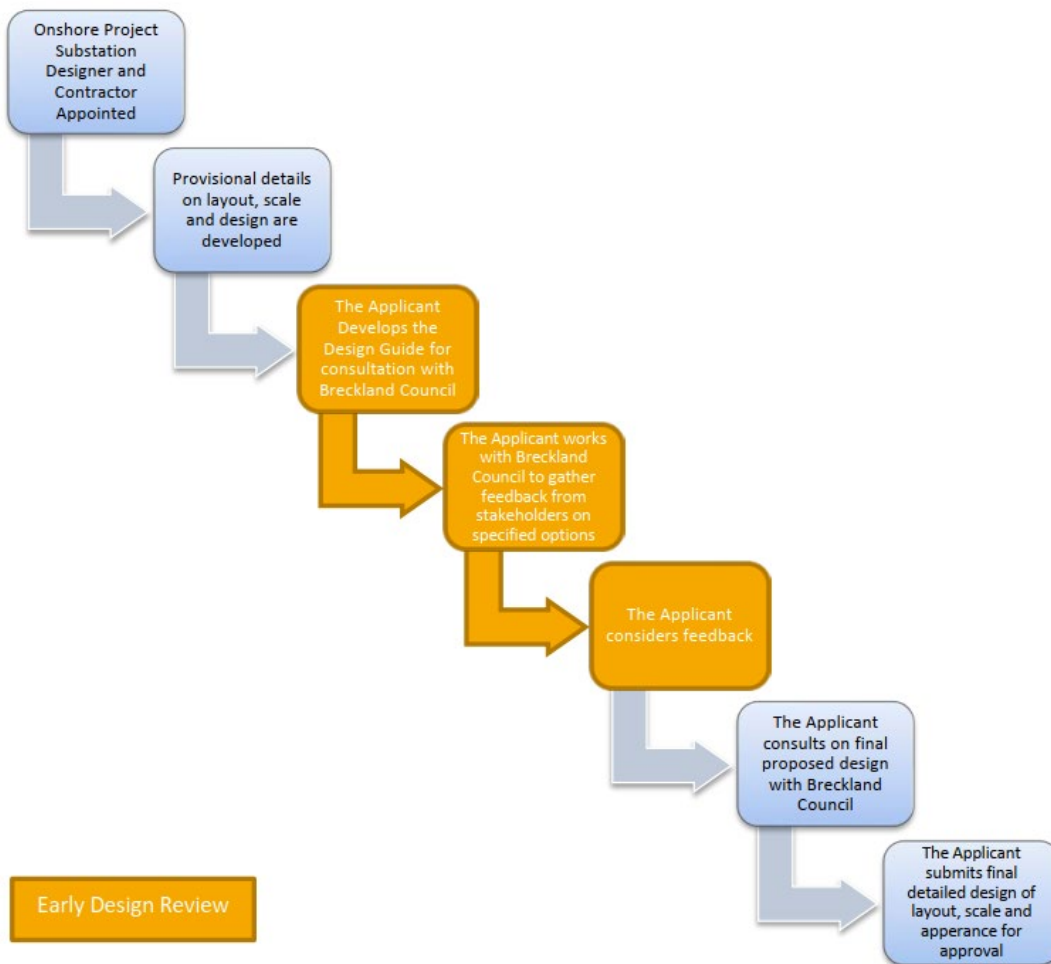
Elements referred to above:-

HORLOCK RULES (National Grid guidance on the design of power network infrastructure)

SECTION 3, SUBSECTION 7, ALL 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.



Best regards

Julian Pearson  
F&OBO Holme Hale Parish Council