

Planning Inspectorate review of Early Adopter Programme products associated with the Outer Dowsing Offshore Wind Farm

The Outer Dowsing Offshore Wind Farm project volunteered to take part in the Early Adopters Programme (EAP) which involves the trialling of potential components of a future enhanced pre-application service. Amongst other components, the project chose to engage in trialling the production of a Design Approach Document (DAD) and a Policy Compliance Document (PCD) to support its application. The potential value of these documents has been indicated through an operational review of the Planning Act 2008 (PA2008) process and their production relates to government policy objectives pertaining to smoother and potentially faster post-submission stages in a reformed PA2008 service.

Background

In October 2023 the Applicant submitted a draft Design Principles Statement (DPS) and a draft PCD for review. The Inspectorate responded with [advice in relation to the development of these documents](#) later in October 2023. The Applicant has responded by voluntarily submitting for further review:

- A draft DAD;
- A draft DPS; and
- A revised draft PCD.

Overarching comments

The Inspectorate is encouraged by the Applicant's receptiveness to the advice issued in relation to the first-round draft EAP products in October 2023. The second submissions are appropriately short, well presented and illustrated and have a much clearer explanation of the relationship both between them and with other key documents that will be included in the eventual application. The diagrams illustrating how the documents have progressed over time are helpful. The Applicant is encouraged to provide more detailed information on both the relationships between documents and the processes by which they have been developed in illustrated form as this provides helpful and important information for stakeholders, particularly the local community, in understanding how the application has been put together.

The purpose of the DAD and DPS is to provide a robust framework within which the proposed development can be presented at the pre-application stage and progressed through acceptance, examination and decision, with the fundamental principles and the actions that will follow from them in the Development Consent Order, certified documents and post-consent decisions robustly maintained and leading to positive outcomes.

At this stage, the Applicant has (a) not yet analysed the final site for the offshore wind farm substation (OWFSS) and (b) is only able to locate the proposed National Grid substation (NGSS) in a broad 'Connection Area' some distance from the OWFSS. While the reasons for these uncertainties are understood and the approach being adopted by the Applicant (and in due course National Grid Electricity Transmission (NGET)) is entirely in accordance with both the legislation and current practice, it results in an approach to place-making ('sensitivity to place' to quote National Policy Statement (NPS) EN-1) that starts from a 'mitigation mindset' rather than a more balanced and hopefully more positive approach that emphasises when in the design process site analysis – of the OWFSS site and ideally of both the OWFSS and NGSS sites in combination – will lead to a detailed consideration of place-making opportunities. The Applicant is encouraged to continue to think beyond

mitigation to 'net-gain' through its design process and to work with NGET on a joint approach to the design and layout of the two sites in combination.

Observations and advice in relation to the draft Design Approach Document

- At section 2.3 paragraph (para) 8, the explanation of the three 'driving principles' of the site selection process is helpful. A fourth principle could be around creating a distinctive place that delivers beneficial spatial outcomes for the local community.
- At section 2.3.1 para 16, listing potential 'local area benefits' is a positive addition to the draft DAD along with the emphasis on 'Environmental stewardship and community engagement', as is the intention to plant many trees, establish wildlife corridors, deliver biodiversity net-gain, partnering with local conservation organisations and creating jobs and enhancing skills. A further step might be to explore whether, within this newly created environment, there are further opportunities for local benefit for, for example, leisure through access, public art, signposting and interpretation facilities.
- The emphasis on 'Proactive mitigation solutions' adopting a 'mitigation by design' approach, described on page 13 is welcomed.
- Equally the commitment to 'ensure good design is considered from the outset' and the approach to site selection and minimising landscape and visual impacts etc described on page 15 demonstrates a positive approach.
- The approach to 'managing significant effects' described on page 15 in which the landscape 'poses challenges in relation to producing an effective screen' raises the question of whether an alternative/ additional approach should be pursued that considers whether the design of the OFWSS buildings and the materials used might achieve a design that celebrates what is happening in the landscape rather than just trying only to hide it.
- Consideration of 'how the final design will be delivered?' in the draft DAD and provision of a Roadmap in the draft DPS are positive steps in ensuring good design might be achieved and are helpful.
- Explaining how the proposed development addresses the National Infrastructure Commission's (NIC) four principles of design upfront on page 17 is welcomed.
- Table 3.2 addressing design compliance with the NPSs is helpful and positive.
- Section 4 'Design Approach' is welcomed. The explanation of the community consultation/ engagement thus far and of other key documents informing the proposed development's design and approach to construction are helpful; but might have included the draft DPS for completeness.
- Plate 4.1 and Table 4.1 are very helpful in conveying how the Applicant has responded to the consultation on design.
- The approach to the Design Review Process (section 5) is generally sound. It is important that the Local Design Panel is open to challenge and advice from the proposed External Design Review Panel (para 5.4), so either the two procedures need to happen in parallel or, possibly, be combined. Para 12 states that 'The Project have committed to an External Design Review of the OnSS following the Project's application'. The Applicant should consider whether this might be too late in the programme to achieve any necessary change. Consideration should be given to whether there would be value in engaging with external review earlier.

- The appointment of a Project Design Champion (PDC) is welcomed, and their objectives as outlined in para 9 is supported. It will be important that the PCD receives advice from both internal and local sources and external experts.

Observations and advice in relation to the draft Design Principles Statement

- Section 1.1 paras 1 and 5 helpfully explain the purpose of the DPS and its relationship to the DAD. It might also explain its relationship to both the Design and Access Statement, if there is to be one, and the Planning Statement. It is welcomed that an 'iterative' approach is being adopted.
- Plate 1.1 is helpful in explaining the development of the DPS and its relationship to the DAD.
- The explanation of the Rochdale Envelope, technical explanations, and the inclusion of the proposed development's maximum parameters along with outline layout models are clear, well presented and helpful.
- Previous comments on the relationship to the proposed NGSS are relevant to section 2.2.3 para 28. The statement in para 29 that the NGSS will 'also be built to provide connections for future projects' underlines the importance of seeking to design the two projects in proper relationship to each other.
- Table 3.1 setting out the 'Design Principles to be adopted' in relation to the NIC's four principles is helpful and positive. It should include a positive principle of 'creating a distinctive place' to address the positive opportunities for local community benefit that may follow from the proposed landscape proposals and outlined earlier. Principle 4 addressing Place explains how visual impact will be addressed. Consideration should be given as to how these proposals might be further developed to create a distinctive place, which celebrates this important infrastructure development.
- Principle 13 'Develop an integrated design' is welcomed. The Applicant should consider whether architectural and spatial planning advice should be added to the list of experts to be consulted.
- Figures 3.1 and 3.2 are helpful and clear.
- The detailed listing of the design elements to be considered set out in section 3.3 is helpful in relation to both maximum parameters and the comprehensive list of elements themselves. It is not clear what the role of the DRP will be where, in several instances, it appears that design choices will be influenced and established through the design review process. While the DRP is welcomed, unless the DRP is seen as a part of the design team, it might be helpful for the Applicant to be more assertive in creating options for the potential form and massing of buildings and materials and for potential materials, colours, etc to be set out in the DPS or a Design and Access Statement.
- It is not clear where options for design elements such as materials, colour, boundary and surface treatments, lighting design etc and design precedents will appear in the documentation. Ideally this should be in the DPS.

Observations and advice in relation to the draft Policy Compliance Document

- While the Applicant has decided not to pursue some of advice emerging from the October 2023 draft document review, the clarity of purpose, clear relationship with

the Planning Statement and clear presentation of this updated PCD is welcomed. Paragraph 5 of section 1.1 explains the thinking behind the PCD as ‘the Applicant recognises the usefulness of a Policy Compliance Document as part of the Early Adopters Programme (EAP) to outline compliance with the relevant NPS(s) (including the published drafts), the local policy framework and any other relevant policy’.

- The PCD explains that further updates are planned, particularly (a) in relation to the proposed revised NPS’s and (b) to include reference to EN-1, EN-3 and EN-5; Marine Policy; the National Planning Policy Framework and Planning Practice Guidance and Local Policy. It is clearly stated that the Applicant regards the PCD and Planning Statement as ‘standalone’ documents in which there will be inevitable overlap, but this will be kept to a minimum.
- The PCD is organised systematically in the order of NPS paragraphs, and it is intended in future that the totality of NPS text will be included. The Planning Statement will also include a thematic policy review and the PCD expands on the discussion relating to the NPSs within the Planning Statement. In addition, according to para 16 of section 1.1 ‘The Applicant will provide a full Environmental Impact Assessment (EIA), which will be reported in the Environmental Statement (ES) that will accompany the application and will include information on the relationship between the Project and the topic-specific planning policies outlined in the NPSs and other relevant legislation, including the Marine Policy Statement’.
- The submitted document refers in Table 1.1, which addresses the proposed development’s accordance with NPS policy, only to EN-1. It is understood that the final submitted document will also include NPSs EN-3 and EN-5 and additionally, sections will be added to draw out and discuss key marine policies and key national and local planning policies, which are considered to be applicable.
- It is considered that, within the parameters set by the Applicant, the PCD provides a helpful and, in due course, comprehensive guide to the steps taken to achieve compliance with NPS and other policies and where the evidence for compliance can be found. As such, it is a valuable addition to assessing the proposed development’s accordance with policy at the examination and beyond.