

XLINKS' MOROCCO-UK POWER PROJECT

Environmental Statement

**Volume 4, Appendix 2.1: Landscape, Seascape and Visual Resources Planning
Policy Context**

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XLINKS' MOROCCO – UK POWER PROJECT

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Glossary

| Term | Meaning |
|--|---|
| Alverdiscott Substation Connection Development | The development required at the existing Alverdiscott Substation Site, which is envisaged to include development of a new 400 kV substation, and other extension modification works to be carried out by National Grid Electricity Transmission. This does not form part of the Proposed Development, however, it is considered cumulatively within the Environmental Impact Assessment as it is necessary to facilitate connection to the national grid. |
| Converter Site | The Converter Site is proposed to be located to the immediate west of the existing Alverdiscott Substation Site in north Devon. The Converter Site would contain two converter stations (known as Bipole 1 and Bipole 2) and associated infrastructure, buildings and landscaping. |
| Converter station | Part of an electrical transmission and distribution system. Converter stations convert electricity from Direct Current to Alternating Current, or vice versa. |
| Environmental Impact Assessment | The process of identifying and assessing the significant effects likely to arise from a project. This requires consideration of the likely changes to the environment, where these arise as a consequence of a project, through comparison with the existing and projected future baseline conditions. |
| Green infrastructure | Networks of green spaces and watercourses and water bodies that connect rural areas, villages, towns and cities. |
| Landfall | The proposed area in which the offshore cables make landfall in the United Kingdom (come on shore) and the transitional area between the offshore cabling and the onshore cabling. This term applies to the entire landfall area at Cornborough Range, Devon, between Mean Low Water Springs and the transition joint bays inclusive of all construction works, including the offshore and onshore cable routes, and landfall compound(s). |
| Landscape character | A distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse. |
| National Landscape | An area of land designated for its natural features of outstanding beauty. The land is protected by the Countryside and Rights of Way Act 2000, in order to conserve and enhance its natural beauty. Previously referred to as an Area of Outstanding Natural Beauty. |
| National Policy Statement(s) | The current national policy statements published by the Department for Energy Security and Net Zero in 2023 and adopted in 2024. |
| Onshore HVDC Cable Corridor | The proposed corridor within which the onshore High Voltage Direct Current cables would be located. |
| Order Limits | The area within which all offshore and onshore components of the Proposed Development are proposed to be located, including areas required on a temporary basis during construction (such as construction compounds). |
| Preliminary Environmental Information Report | A report that provides preliminary environmental information in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. This is information that enables consultees to understand the likely significant environmental effects of a project, and which helps to inform consultation responses. |
| Proposed Development | The element of Xlinks' Morocco-UK Power Project within the UK. The Proposed Development covers all works required to construct and operate the offshore cables (from the UK Exclusive Economic Zone to Landfall), Landfall, onshore Direct Current and Alternating Current cables, converter stations, and highways improvements. |
| Visual amenity | The overall pleasantness of the views people enjoy in their surroundings, which provides an attractive visual setting or backdrop for the enjoyment of activities of the people living, working, recreating, visiting or travelling through an area. |
| Xlinks' Morocco-UK Power Project | The overall scheme from Morocco to the national grid, including all onshore and offshore elements of the transmission network and the generation site in Morocco (referred to as the 'Project'). |

Acronyms

| Acronym | Meaning |
|----------------|--|
| AONB | Area of Outstanding National Beauty (now National Landscape) |
| DESNZ | Department for Energy Security and Net Zero |
| EIA | Environmental Impact Assessment |
| ES | Environmental Statement |
| HVDC | High Voltage Direct Current |
| LSVIA | Landscape and Seascape Visual Impact Assessment |
| NGC | National Grid Company |
| NL | National Landscape (formerly AONB) |
| NPPF | National Planning Policy Framework |
| NPPG | National Planning Policy Guidance |
| NPS | National Policy Statement |
| PPG | Planning Practice Guidance |
| UK | United Kingdom |

1 LANDSCAPE, SEASCAPE AND VISUAL RESOURCES PLANNING POLICY CONTEXT

1.1 Introduction

- 1.1.1 This document forms Volume 4, Appendix 2.1: Landscape, Seascape and Visual Resources Planning Policy Context of the Environmental Statement (ES) prepared for Xlinks' Morocco-UK Power Project (the 'Project'). For ease of reference, the UK elements of the Project are referred to as the 'Proposed Development', which is the focus of this ES. The ES presents the findings of the Environmental Impact Assessment (EIA) process for the Proposed Development.
- 1.1.2 This document sets out details of the national and local planning policy used to inform the Landscape, Seascape and Visual Impact Assessment.

1.2 Primary Legislation

National Parks and Access to the Countryside Act 1949

- 1.2.1 The Access to the Countryside Act 1949 makes provision for National Parks and other protected areas, such as National Landscapes, for public rights of way access to open country. The establishment of a National Parks Commission was also established in order to protect, enhance and conserve such designated areas in terms of management and conservation.

Countryside and Rights of Way Act 2000

- 1.2.2 The Countryside Rights of Way Act (CRoW Act) was established to make new provisions for public access to the countryside and to amend the law in relation to public rights of way, open access land and nature conservation, whilst also providing safeguards for landowners and occupiers. The Act also modernised the rights of way system and provided greater protection for Sites of Special Scientific Interest (SSSI) and better management arrangements for National Landscapes (formerly referred to as Areas of Outstanding Natural Beauty (AONB)).

Levelling-up and Regeneration Act 2023

- 1.2.1 The Levelling-up and Regeneration Act (LURA) forms a suite of revised policies and supplementary planning processes produced by the UK Government to streamline the planning process with respects to house building, which include Nationally Significant Infrastructure Projects (NSIPs).
- 1.2.2 Part 6 of the LURA proposes new domestic frameworks for environmental assessment and ways in which this framework in the form of Environmental Outcomes Reports (EORs) that would supersede the EU-derived Strategic Environmental Assessment and Environmental Impact Assessment (EIA)

processes with respects to domestic schemes. This outcome-based system would be more streamlined and place a greater focus on delivering the environmental ambitions within the UK domestic environment.

- 1.2.3 EOR Regulations may require an EOR to be prepared in relation to a proposed relevant consent or proposed relevant plan. The consent would then only be granted for the project when an EOR has been prepared and taken into account. The introduction of outcome-based approaches would allow the government to reflect its environmental priorities directly into the plan-making and decision-making process on the largest developments.
- 1.2.4 Section 152(1) confirms that outcomes relating to environmental protection in the UK, or a relevant offshore area may be specified by the EOR regulations.
- 1.2.5 Section 153(4) defines an EOR as a written report which assesses the impact on the delivery of specific environmental outcomes and steps which would be taken to avoid, mitigate or compensate for any effects on those outcomes that cannot be delivered.
- 1.2.6 Section 245 of the bill concerns itself with protected landscapes, notably National Parks and their associated management plans with amendments to National Park legislation. The provisions of the act within this section attaches greater weight to the purpose of conserving and enhancing such designated landscapes. Additionally, National Park management plans can make contributions to the meeting of environmental targets under Part 1 of the Environmental Act 2021, and provide details as to how this will be achieved.
- 1.2.7 The current LURA bill sets out the objectives for future reforms and changes to the planning system with respects to environmental assessment through EOR as a more effective tool for managing the effects of a development on the natural environment and supporting environmental outcomes. It should be noted however that the LURA bill is subject to further consultation and in conjunction with additional forthcoming reforms of the NPPF. As such, current EIA legislation and overarching environmental policy are still applicable until the revised domestic environmental planning processes are ratified.

1.3 Policy Context

National Policy Statements

Overarching National Policy Statement for Energy (EN-1) (November 2023)

- 1.3.1 National Policy Statement (NPS) EN-1 (Department for Energy Security and Net Zero (DESNZ), 2023a) sets out national policy for the energy infrastructure which affects decisions made by DESNZ.
- 1.3.2 NPS EN-1 also specifically recognises that there is a Critical National Priority (CNP) for the provision of significant low carbon infrastructure, stating in paragraph 3.3.62: *'Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. Section 4.2 states which energy generating technologies are low carbon and are therefore CNP infrastructure.'*

- 1.3.3 Section 4.2, paragraph 4.25, defines what is considered as low carbon infrastructure, which states *for electricity grid infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations.*
- 1.3.4 Paragraph 3.3.63 also outlines *‘Subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible.’*
- 1.3.5 National Policy Statement (NPS) EN-3 sets out national policy for the energy generation from renewable resources which affects decisions made by the Secretary of State for the Department of Energy Security and Net Zero.
- 1.3.6 NPS EN-3, together with EN-1, is part of a suite of energy infrastructure NPSs which sets out specific criteria and assessment principles in respects nationally significant offshore renewable electricity generating stations in waters adjacent to England or Wales up to the seaward limits of the territorial sea.
- 1.3.7 NPS EN-5 (DESNZ, 2023b) sets out national policy for the energy infrastructure which affects decisions made by the Secretary of State for the Department of Energy Security and Net Zero. NPS EN-5, together with EN-1, sets out specific criteria and assessment principles in respects of onshore-offshore transmission of electricity networks and associated infrastructure.
- 1.3.8 **Table 1.1** sets out key aspects from the NPSs relevant to the Proposed Development, with particular reference to the need for and approach to consenting such infrastructure. .

Table 1.1: Summary of relevant NPS policy

| Summary of NPS Requirement |
|--|
| NPS EN-1 Provisions relevant to landscape and visual resources |
| <p><i>‘In addition to delivering biodiversity net gain, developments may also deliver wider environmental gains and benefits to communities relevant to the local area, and to national policy priorities, such as...</i></p> <ul style="list-style-type: none"> • <i>...landscape enhancement</i> • <i>increased access to natural greenspace, or</i> • <i>the enhancement, expansion or provision of trees and woodlands.</i> <p>[Paragraph 4.6.13 NPS EN-1]</p> |
| <p><i>‘Applications for development consent should be accompanied by a statement demonstrating how opportunities for delivering wider environmental net gains considered, and where appropriate, incorporated into proposals as part of good design (including any relevant operational aspects) of the project.’</i></p> <p>[Paragraph 4.6.15 NPS EN-1]</p> |
| <p><i>‘Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area.’</i></p> <p>[Paragraph 4.7.2 of NPS EN-1]</p> |
| <p><i>‘Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, landform and vegetation. Furthermore, the design and sensitive use of materials in any associated development such as electricity substations will assist in</i></p> |

| Summary of NPS Requirement |
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| <p><i>ensuring that such development contributes to the quality of the area. Applicants should also, so far as is possible, seek to embed opportunities for nature inclusive design within the design process.'</i> [Paragraph 4.7.6 of NPS EN-1]</p> |
| <p><i>'The landscape and visual effects of energy projects will vary on a case by case basis according to the type of development, its location and the landscape setting of the proposed development. In this context, references to landscape should be taken as covering seascape and townscape where appropriate.'</i> [Paragraph 5.10.1 NPS EN-1]</p> |
| <p><i>'Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation.'</i> [Paragraph 5.10.5 of NPS EN-1]</p> |
| <p><i>'Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.'</i> [Paragraph 5.10.6 of NPS EN-1]</p> |
| <p><i>'The duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. In these locations, projects should be designed sensitively given the various siting, operational, and other relevant constraints. The Secretary of State should be satisfied that measures which seek to further the purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development.'</i> [Paragraph 5.10.8 of NPS EN-1]</p> |
| <p><i>'The Secretary of State has a duty of to have regard to the statutory purposes of National Parks and AONBs in Wales when making decisions about development schemes within England which affect designated landscapes in Wales. Similar regard should also be had in relation to schemes in England which have impacts on National Parks and National Scenic Areas in Scotland.'</i> [Paragraph 5.10.9 of NPS EN-1]</p> |
| <p><i>'Outside nationally designated areas, there are local landscapes that may be highly valued locally. Where a local development document in England or a local development plan in Wales has policies based on landscape or waterscape character assessment, these should be paid particular attention. However, locally valued landscapes should not be used in themselves to refuse consent, as this may unduly restrict acceptable development.'</i> [Paragraph 5.10.12 of NPS EN-1]</p> |
| <p><i>'All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites.'</i> [Paragraph 5.10.13 of NPS EN-1]</p> |
| <p><i>'The Secretary of State will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project.'</i> [Paragraph 5.10.14]</p> |
| <p><i>'Coastal areas are particularly vulnerable to visual intrusion because of the potential high visibility of development on the foreshore, on the skyline and affecting views along stretches of undeveloped coast.'</i> [Paragraph 5.10.15 of NPS EN-1]</p> |
| <p><i>'Landscape effects arise not only from the sensitivity of the landscape but also the nature and magnitude of change proposed by the development, whose specific siting and design make the assessment a case-by-case judgement.'</i> [Paragraph 5.10.4 of NPS EN-1]</p> |
| <p><i>'The applicant should carry out a landscape and visual impact assessment and report it in the ES, including cumulative effects (see section 4.3). Several guides have been produced to assist in addressing landscape issues.'</i> [Paragraph 5.10.16 of NPS EN-1]</p> |

| Summary of NPS Requirement |
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| <p><i>'The landscape and visual assessment should include reference to any landscape character assessment and associated studies as a means of assessing landscape impacts relevant to the proposed project. The applicant's assessment should also take account of any relevant policies based on these assessments in local development documents in England and local development plans in Wales.'</i></p> <p>[Paragraph 5.10.17 of NPS EN-1]</p> |
| <p><i>'For seascapes, applicants should consult the Seascape Character Assessment and the Marine Plan Seascape Character Assessments, and any successors to them.'</i></p> <p>[Paragraph 5.10.18 of NPS EN-1]</p> |
| <p><i>'The applicant should consider landscape and visual matters in the early stages of siting and design, where site choices and design principles are being established. This will allow the applicant to demonstrate in the ES how negative effects have been minimised and opportunities for creating positive benefits or enhancement have been recognised incorporated into the design, delivery and operation of the scheme.'</i></p> <p>[Paragraph 5.10.19 of NPS EN-1]</p> |
| <p><i>'The assessment should include the effects on landscape components and character during construction and operation. For projects which may affect a National Park, or an NL, the assessment should include effects on the natural beauty and special qualities of these areas.'</i></p> <p>[Paragraph 5.10.20 of NPS EN-1]</p> |
| <p><i>'The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This should include light pollution effects, including on dark skies, local amenity, and nature conservation.'</i></p> <p>[Paragraph 5.10.21 of NPS EN-1]</p> |
| <p><i>'The assessment should also address the landscape and visual effects of noise and light pollution, and other emissions (see Section 5.2 and Section 5.7), from construction and operational activities on residential amenity and on sensitive locations, receptors and views, how these will be minimised.'</i></p> <p>[Paragraph 5.10.22 of NPS EN-1]</p> |
| <p><i>'Applicants should consider how landscapes can be enhanced using landscape management plans, as this will help to enhance environmental assets where they contribute to landscape quality.'</i></p> <p>[Paragraphs 5.10.24 of NPS EN-1]</p> |
| <p><i>'In considering visual effects it may be helpful for applicants to draw attention, in the supporting evidence to their applications, to any examples of existing permitted infrastructure they are aware of with a similar magnitude of impact on sensitive receptors. This may assist the Secretary of State in judging the weight they should give to the assessed visual impacts of the proposed development.'</i></p> <p>[Paragraph 5.10.25 of NPS EN-1]</p> |
| <p><i>'Reducing the scale of a project can help to mitigate the visual and landscape effects of a proposed project. However, reducing the scale or otherwise amending the design of a proposed energy infrastructure project may result in a significant operational constraint and reduction in function – for example, electricity generation output. There may, however, be exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in function. In these circumstances, the Secretary of State may decide that the benefits of the mitigation to reduce the landscape and/or visual effects outweigh the marginal loss of function.'</i></p> <p>[Paragraph 5.10.26 of NPS EN-1]</p> |
| <p><i>'Adverse landscape and visual effects may be minimised through appropriate siting of infrastructure within its development site and wider setting. The careful consideration of colours and materials will support the delivery of a well-designed scheme, as will sympathetic landscaping and management of its immediate surroundings.'</i></p> <p>[Paragraph 5.10.27 of NPS EN-1]</p> |
| <p><i>'Depending on the topography of the surrounding terrain and areas of population it may be appropriate to undertake landscaping off site. For example, filling in gaps in existing tree and hedge lines may mitigate the impact when viewed from a more distant vista.'</i></p> <p>[Paragraph 5.10.28 of NPS EN-1]</p> |

| <p>Summary of NPS Requirement</p> |
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| <p><i>'The scale of energy projects means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project.'</i> [Paragraph 5.10.35 of NPS EN-1]</p> |
| <p><i>'In reaching a judgment, the Secretary of State should consider whether any adverse impact is temporary, such as during construction, and/or whether any adverse impact on the landscape will be capable of being reversed in a timescale that the Secretary of State considers reasonable.'</i> [Paragraph 5.10.36 of NPS EN-1]</p> |
| <p><i>'The Secretary of State should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by appropriate mitigation.'</i> [Paragraph 5.10.37 of NPS EN-1]</p> |
| <p><i>'The Secretary of State should consider whether Requirements to the consent are needed requiring the incorporation of particular design details that are in keeping with the statutory and technical Requirements for landscape and visual impacts.'</i> [Paragraph 5.10.38 of NPS EN-1]</p> |
| <p><i>'An energy infrastructure project will have a direct effect on the existing use of the proposed site and may have indirect effects on the use, or planned use, of land in the vicinity for other types of development. Given the likely locations of energy infrastructure projects there may be particular effects on open space including green and blue infrastructure.'</i> [Paragraph 5.11.1 of NPS EN-1]</p> |
| <p><i>'Existing trees and woodlands should be retained wherever possible. In the EIP, the Government committed to increase the tree canopy and woodland cover to 16.5% of total land area of England by 2050. The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the scheme. Mitigation may include, but is not limited to, the use of buffers to enhance resilience, improvements to connectivity, and improved woodland management. Where woodland loss is unavoidable, compensation schemes will be required, and the long-term management and maintenance of newly planted trees should be secured.'</i> [Paragraph 5.11.27 of NPS EN-1]</p> |
| <p><i>'Where a project has a sterilising effect on land use (for example in some cases under transmission lines) there may be scope for this to be mitigated through, for example, using or incorporating the land for nature conservation or wildlife corridors or for parking and storage in employment areas.'</i> [Paragraph 5.11.29 of NPS EN-1]</p> |
| <p><i>'Public rights of way, National Trails, and other rights of access to land are important recreational facilities for example for walkers, cyclists and horse riders. The Secretary of State should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, other rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve or create new access. In considering revisions to an existing right of way, consideration should be given to the use, character, attractiveness, and convenience of the right of way.'</i> [Paragraph 5.11.30 of NPS EN-1]</p> |
| <p><i>'The Secretary of State should consider whether the mitigation measures put forward by an applicant are acceptable and whether Requirements or other provisions in respect of these measures should be included in any grant of development consent.'</i> [Paragraph 5.11.31 of NPS EN-1]</p> |
| <p><i>'Applicants should include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both construction and operational phase.'</i> [Paragraph 5.4.32 of NPS EN-1]</p> |

| Summary of NPS Requirement |
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| <p><i>'Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Keepers of Time, the government's policy for ancient and native trees and woodlands in England sets out the government's commitment to maintain and enhance the existing area of ancient woodland, maintain and enhance the existing resource of known ancient and veteran trees, excluding natural losses from disease and death, and to increase the percentage of ancient woodland in active management. Ancient and veteran trees found outside ancient woodland are also particularly valuable. Other types of irreplaceable habitats include blanket bog, limestone pavement, coastal sand dunes, spartina salt marsh swards, Mediterranean saltmarsh scrub, and lowland fen.'</i></p> <p>[Paragraph 5.4.15 of NPS EN-1]</p> |
| <p>NPS EN-3 Provisions relevant to landscape and visual resources</p> |
| <p><i>'When considering applications for CNP [critical national priority] Infrastructure in sites with nationally recognised designations (such as SSSIs, National Nature Reserves, National Parks, the Broads, Areas of Outstanding Natural Beauty, Registered Parks and Gardens, and World Heritage Sites), the Secretary of State will take as the starting point that the relevant tests in Sections 5.4 and 5.10 of EN-1 have been met, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the urgent need for this type of infrastructure.'</i></p> <p>[Paragraph 2.3.6 of NPS EN-3]</p> |
| <p><i>'Proposals for renewable energy infrastructure should demonstrate good design, particularly in respect of landscape and visual amenity, opportunities for co-existence/co-location with other marine and terrestrial uses, and in the design of the project to mitigate impacts such as noise and effects on ecology and heritage.'</i></p> <p>[Paragraph 2.5.2 of NPS EN-3]</p> |
| <p><i>'Applicants should follow relevant guidance including, but not limited to seascape and landscape character assessments, landscape sensitivity assessments, and marine plan seascape character assessments (e.g., NRW Marine Character Areas (with associated guidance) England's marine plans).'</i></p> <p>[Paragraph 2.8.207 of NPS EN-3]</p> |
| <p><i>'As part of the [S]LVIA, photomontages will be required. Viewpoints to be used for the [S]LVIA should be selected in consultation with the statutory consultees at the EIA Scoping stage.'</i></p> <p>[Paragraph 2.8.210 of NPS EN-3]</p> |
| <p><i>'Applicants should assess the magnitude and significance of change to both the identified seascape receptors (such as seascape and landscape units, visual receptors and the special qualities of designated landscapes) in accordance with the standard methodology for [S]LVIA.'</i></p> <p>[Paragraph 2.8.211 of NPS EN-3]</p> |
| <p><i>'Where appropriate, cumulative [S]LVIA should be undertaken in accordance with the policy on cumulative assessment outlined in Section 5.10.16-17 of EN-1.'</i></p> <p>[Paragraph 2.8.212 of NPS EN-3]</p> |
| <p><i>'Where adverse effects are anticipated either during the construction or operational phases, in coming to a judgement the Secretary of State should consider the extent to which the effects are temporary or reversible.'</i></p> <p>[Paragraph 2.8.352 of NPS EN-3]</p> |
| <p>NPS EN-5 Provisions relevant to landscape and visual resources</p> |
| <p><i>'There will usually be a degree of flexibility in the location of the development's associated substations, and applicants should consider carefully their placement in the local landscape, as well as their design.'</i></p> <p>[Paragraph 2.2.8 of NPS EN-5]</p> |
| <p><i>'New substations, sealing end compounds (including terminal towers), and other above-ground installations that serve as connection, switching, and voltage transformation points on the electricity network may also give rise to adverse landscape and visual impacts.'</i></p> <p>[Paragraph 2.9.9 of NPS EN-5]</p> |

| Summary of NPS Requirement |
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| <p><i>'Cumulative adverse landscape and visual impacts may arise where new overhead lines are required along with other related developments such as substations, wind farms, and/or other new sources of generation.'</i></p> <p>[Paragraph 2.9.10 of NPS EN-5]</p> |
| <p><i>'The Horlock Rules – guidelines for the design and siting of substations – were established by National Grid in 2009 in pursuance of its duties under Schedule 9 to the Electricity Act 1989. These principles should be embodied in applicants' proposals for the infrastructure associated with new overhead lines.'</i></p> <p>[Paragraphs 2.9.18 of NPS EN-5]</p> <p>Paragraph 2.9.19 of NPS EN-5 lists the requirements of the Horlock Rules, which the applicants should consider.</p> |
| <p><i>'• Additionally, there are more specific measures that might be taken, and which the Secretary of State could mandate through DCO Requirements if appropriate, as follows:</i></p> <ul style="list-style-type: none"> <i>• landscape schemes, comprising off-site tree and hedgerow planting, are sometimes used for larger new overhead line projects to mitigate potential landscape and visual impacts, softening the effect of a new above ground line whilst providing some screening from important visual receptors. These may be implemented with the agreement of the relevant landowner(s), or the developer may compulsorily acquire the land or land rights in question. Advice from the relevant statutory authority may also be needed; and</i> <i>• screening, comprising localised planting in the immediate vicinity of residential properties and principal viewpoints can also help to screen or soften the effect of the line, reducing the visual impact from a particular receptor.'</i> <p>[Paragraph 2.10.6 of NPS EN-5]</p> |
| <p><i>'Furthermore, since long-term management of the selected mitigation schemes is essential to their mitigating function, a management plan, developed at least in outline at the conclusion of the examination, and which sets out proposals within a realistic timescale, should secure the integrity and benefit of these schemes.'</i></p> <p>[Paragraph 2.10.8 of NPS EN-5]</p> |
| <p><i>'The Secretary of State should be satisfied that the development, so far as is reasonably possible, complies with the Holford and Horlock Rules (please see paragraphs 2.9.16 - 2.9.19) or any updates to them.'</i></p> <p>[Paragraph 2.11.2 of NPS EN-5]</p> |
| <p><i>'In circumstances where it can be demonstrated that a mitigation measure and/ or technological approach is appropriate and/ or necessary for a project, including to limit landscape and visual impact as set out above, the Secretary of State should take this into account in decision making.'</i></p> <p>[Paragraph 2.11.4 of NPS EN-5]</p> |
| <p><i>'Nationally designated landscapes have specific statutory purposes which help ensure their continued protection. The Secretary of State should have special regard to nationally designated landscapes, where the general presumption in favour of overhead lines should be reversed to favour undergrounding.'</i></p> <p>[Paragraph 2.11.5 of NPS EN-5]</p> |
| <p><i>'When planning and evaluating the proposed development's contribution to environmental and biodiversity net gain, it will be important – for both the applicant and the Secretary of State – to supplement the generic guidance set out in EN-1 (Section 4.6) with recognition that the linear nature of electricity networks infrastructure can allow for excellent opportunities to:</i></p> <ol style="list-style-type: none"> <i>i. reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or</i> <i>ii. connect people to the environment, for instance via footpaths and cycleways constructed in tandem with environmental enhancements.'</i> <p>[Paragraph 2.5.1 of NPS EN-5]</p> |

National Planning Policy Framework

- 1.3.9 The National Planning Policy Framework (NPPF) was published in 2012 and updated in 2018, 2019, 2021, 2023 and 2024 (Ministry of Housing, Communities and Local Government, 2024). The NPPF sets out the Government's planning policies for England. The NPPF emphasises the importance of achieving sustainable development. The proposed Project will enable the transmission of 3.6 GW of renewable energy to be transferred from Morocco to the national grid. At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 10).
- 1.3.10 Section 2, paragraph 7 notes that: *'The purpose of the planning system is to contribute to the achievement of sustainable development.'*
- 1.3.11 NPPF Section 2 Achieving sustainable development, paragraph 8, explains that to achieve this, the planning system has three objectives, economic, social and environmental, which is *'to protect and enhance our natural, built, and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.'*
- 1.3.12 Paragraph 11 explains that *'plans and decisions should apply a presumption in favour of sustainable development.'* For decision-taking this means d) granting permission unless:
- 'i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed.'*
- 1.3.13 Footnote 7 lists those sites of particular importance. For landscape these are Local Green Space, National Landscapes and National Parks. The Landfall and part of the onshore HVDC Cable Corridor lie within the North Devon Coast National Landscape.
- 1.3.14 Paragraph 163 of the NPPF states that *'When determining planning applications for renewable and low carbon development, local planning authorities should: approve the application if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.'*
- 1.3.15 Section 14 is also concerned with the changing climate, coastal change and flood risk. The North Devon and Somerset Shoreline Management Plan Review - Final Plan Summary notes that Area 2 Hartland Point to Westward Ho! (policy units 7c03 to 7c05) within which the Landfall lies, is at very little risk of erosion or flooding and the long-term plan is to allow the coast to evolve naturally along much of its length. The onshore HVDC Cable Corridor passes underneath the River Torridge, at Area 4 Taw/Torridge Estuary (policy units 7c11 and 7c13) and would not affect the management plans for these policy units. The proposed works at the Landfall and along the onshore HVDC Cable Corridor during the construction phase is appropriate development in landscape and visual terms (NPPF, paragraph 173).
- 1.3.16 NPPF section 15, paragraph 180, requires that *'Planning policies and decisions should contribute to and enhance the natural and local environment by:*

- a) *protecting and enhancing valued landscapes...(in a manner commensurate with their statutory status or identified quality in the development plan).*
- b) *recognising the intrinsic character and beauty of the countryside...*
- c) *Maintaining the character of the undeveloped coast...*

- 1.3.17 Paragraph 181 explains '*Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.*'
- 1.3.18 NPPF, paragraph 182 requires that '*Great weight should be given to conserving and enhancing landscape and scenic beauty in...Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues.*' The Landfall and western part of the onshore HVDC Cable Corridor, including some construction compounds are located within the North Devon Coast National Landscape. The NPPF adds that the scale and extent of development within such areas should be limited. Other than for developments in the public interest, major development in such areas should be refused (paragraph 183). What constitutes major development is a matter for the decision-maker, '*taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined*' (Footnote 64). It is of note that the impact of the Landfall and the onshore HVDC Cable Corridor is during the construction and decommissioning phases only, as they are both underground and any landscape elements that are removed due to open cut trenching installation, rather than drilling, would be replaced, either at the same location, or as close to the original location, as is physically possible, given the constraints of the scheme.
- 1.3.19 Paragraph 191 requires that '*Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.*'
- 1.3.20 The strategic objectives relating the landscape and visual environment contained in the NPPF, summarised above, are reflected in local planning policy as reviewed in relation to North Devon and Torridge District, in **paragraphs 1.4.2 to 1.4.17**.

NPPF Consultation Draft (emerging policy) (30th July 2024)

- 1.3.21 On 30 July 2024, the Government published a draft of the revised NPPF, which is subject to further public consultation until 24 September 2024. The key policy changes to the NPPF consist of updates to housing policy and targets, Green Belt policy and additional of Grey Belt definitions. With respects to renewable developments, changes in paragraph 164 of the draft NPPF refer to planning applications for all forms of renewable and low carbon development, and how they should be supported by local planning authorities. It also notes that in (a), local

planning authorities should *'give significant weight to the proposals contribution to renewable energy and a net zero future.'*

Secretary of State - Ministerial Statement – Building the homes we need (30 July 2024)

- 1.3.22 The Secretary of State issued a statement (UIN HCWS48) on 30 July 2024 broadly outlining details of policy and planning reforms to be made during the term of the new Government. Within this statement, a reference was made to the need for improvement on energy delivery in order to meet the Government's target of net zero carbon electricity generation by 2030. The statement also outlined the need for additional weighting on planning policy with respect to renewable energy and the Nationally Significant Infrastructure Projects regime.
- 1.3.23 This statement forms the basis of the forthcoming revisions to the NPPF and the emphasis on renewable energy projects and generation in terms of their importance to national infrastructure of which this scheme is subject to, whereby priority will be given during the planning process in order to grow the UK economy.

Planning Practice Guidance

- 1.3.24 The NPPF is supported by the Planning Practice Guidance (PPG) (DCLG, 2014) a web-based guidance resource that was introduced in 2014 in order to bring together existing planning practice guidance for England in an accessible and useable way. The Natural Environment section was updated in February 2024 and the Light Pollution section was updated November 2019. Only those sections of relevance to the Proposed Development are discussed below.

Natural Environment – Landscape (14 February 2024)

- 1.3.25 PPG at paragraph: 036 (Reference ID: 8-036-20190721) explains the NPPF requires that *'plans should recognise the intrinsic character and beauty of the countryside, and that strategic policies should provide for the conservation and enhancement of landscapes. This can include nationally and locally designated landscapes but also the wider countryside.'*
- 1.3.26 In the same paragraph, the PPG requires that where landscapes have a particular, local value planning policies should *'identify their special characteristics and be supported by proportionate evidence.'* In addition, *'Plans can also include policies to avoid adverse impacts on landscapes and to set out necessary mitigation measures...'* also *'The cumulative impacts of development on the landscape need to be considered carefully.'*
- 1.3.27 In the same paragraph, the PPG refers to using Landscape and Visual Impact Assessments to demonstrate the likely effects of a Proposed Development on the landscape. The baseline character and the likely landscape and visual effects are assessed in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES.

Light pollution (1 November 2019)

- 1.3.28 The PPG explains that factors that are relevant when considering when light shines, are: considering turning off or dimming light to minimise visual impact on humans, flora, and fauna (paragraph: 004 Reference ID: 31-004-20191101).
- 1.3.29 Factors relevant to how much the light shines are considered (paragraph: 005 Reference ID: 31-005-20191101). Factors include, necessity, amount, glare, the colour of the light, as well as who and/or what might be affected by it. The ecological impacts of light are also considered (paragraph: 006 Reference ID: 31-006-20191101).

1.4 Local Policy

Local Development Framework

- 1.4.1 The local development framework is made up of a number of documents. The application will be determined with consideration to the North Devon and Torridge District Local Plan (adopted 2018). Those policies of relevance to assessing landscape and visual matters are detailed below.

North Devon and Torridge Local Plan 2011-2031

- 1.4.2 The onshore elements of the Order Limits are situated within the districts of Torridge and North Devon. Therefore, the relevant local policies are set out in the North Devon and Torridge District Local Plan 2011-2031.
- 1.4.3 Relevant North Devon and Torridge policies regarding the Proposed Development and potential impacts on landscape character and visual receptors are set out below.

Section 2 Spatial Planning Vision

- 1.4.4 Paragraph 2.1 states *'The overarching principle supporting the Local Plan in northern Devon is to contribute to the achievement of sustainable development. It is the intention of the Councils to enable the delivery of infrastructure, jobs, accessible local services and housing for future generations while supporting the world-class environment of the [North Devon] Biosphere Reserve.'*
- 1.4.5 Paragraph 2.9 of the Local Plan explains that the spatial implications and opportunities arising from the North Devon Biosphere Reserve in which the Order Limits lies, include *'enhancing green infrastructure networks at a landscape scale.'*
- 1.4.6 One of the key Challenges is noted as *'Protecting the high quality natural environment and the coastal environment in particular, is vital and underpins tourism. Future development must be sensitive to the area's environmental assets and ensure that the local character, distinctiveness and environmental quality is not eroded but where possible enhanced as a consequence of development.'* (Local Plan paragraph 2.21, point (i)). Point (j) explains that another key challenge is *'Delivering necessary development, while minimising the impact on the environment and responding to the implications of climate change.'*

- 1.4.7 Strategic Aim 2 is A World Class Environment – *‘where important assets are valued and enhanced for future generations’*. Objective (a) is the protection and enhancement of the coastline, estuarine and important countryside assets.

Policy ST04: Improving the quality of development

- 1.4.8 The policy requires that development will achieve high quality design, responding to the characteristics of the site, its wider context and the surrounding area.
- 1.4.9 While this policy is primarily about residential development a few principles are applicable to the Proposed Development. The explanatory text requires that new development should be visually interesting and complement their landscape (Local Plan, paragraph 3.26). Within the North Devon Biosphere Transition Zone innovative approaches will be encouraged (paragraph 3.29).

Policy DM01: Amenity considerations

- 1.4.10 Policy DM01 explains that development *‘will be supported where (a) it would not significantly harm the amenities of any neighbouring occupiers or uses.’*
- 1.4.11 The explanatory text at Local Plan paragraph 13.3 (b) is concerned with light intrusion, explaining that *“poorly designed lighting can result in the spillage of light into the countryside, impact on residential amenities and increase sky glow.”* The need to minimise unnecessarily obtrusive lighting, by design is highlighted.

Policy DM02 Environmental protection

- 1.4.12 The prevention of light pollution is also raised in this development management policy. Point (2) (d) explains that development will be supported if it does not result in unacceptable impacts to *“light pollution (sky glow, light intrusion, and light spillage), where light overspills on to areas not intended to be lit. Areas particularly sensitive to light pollution include tranquil areas of open countryside, in particular areas of nature conservation value and Exmoor National Park’s Dark Sky Reserve.”* The onshore elements of the Order Limits crosses and is situated within a rural area, but is not located in or near Exmoor National Park or the Dark Sky Reserve.

Policy DM04 Design principles

- 1.4.13 This policy explains that good design should: (a) be sympathetic to setting in terms of scale, density, massing height, layout and landscape features; (b) reinforce the key characteristics and special qualities of the area in which the development is proposed; (d) contribute positively to local distinctiveness; and, (f) retain and integrate existing landscape features. The dimensions of the converter stations are dictated by their function, as is the width of the onshore HVDC Cable Corridor.

Policy DM08A: Landscape and seascape character

- 1.4.14 The policy requires development to be: (1) *“of an appropriate scale, mass and design that recognises and respects the landscape character of both designated and undesignated landscapes and seascapes; it should avoid adverse landscape and seascape impacts and seek to enhance the landscape and seascape assets wherever possible.”* The sensitivity and capacity of the landscape/seascape asset

should be considered, using the Landscape and Seascape Character Assessment for North Devon and Torridge, and should include cumulative impacts.

- 1.4.15 Point (2) of the policy is concerned with development within or affecting the setting of the North Devon Coast National Landscape or affecting the setting of the Exmoor National Park. While the Order Limits is outside the Exmoor National Park and its setting, the proposed onshore HVDC Cable Corridor passes through the North Devon Coast National Landscape, albeit underground. New development in this area should have regard to its statutory purposes, including the conservation and enhancement of landscape character and natural beauty. Development will not be permitted where it conflicts with or compromises the statutory purposes of the landscape designation.
- 1.4.16 Point (3) is concerned specifically with development within or affecting the setting of the National Landscape, noting that development should not compromise the 'North Devon Coast AONB Management Plan'. Major development within the National Landscape will be refused, unless it can be demonstrated that the development is in the public interest as set out in national policy. The landfall and part of the onshore HVDC Cable Corridor cross the National Landscape. During construction, work at the Landfall and along the onshore HVDC Cable Corridor would be visible, but during operation all works will be underground. The Converter Site is not within the National Landscape, nor within its setting. The Proposed Development is a nationally important development.

Policy DM09: Safeguarding green infrastructure

- 1.4.17 The policy states that development involving the loss of green infrastructure will only be supported where (a) equivalent, alternative green infrastructure is provided, or (b) the existing network of green infrastructure can be retained or enhanced. There will be a temporary loss of hedgerows where the onshore HVDC Cable Corridor crosses hedgerows/other environmental assets in trenches (open cut) rather than drilled beneath them. The hedgerows/other environmental assets will be reinstated once the cables have been installed. The converter stations are proposed to be situated within agricultural fields. Existing vegetation and landscape features around the boundaries of the fields will be retained and additional planting is proposed, both in the immediate vicinity of the converter stations, and in the adjacent fields, as part of the landscape mitigation, building on landscape features, e.g., woodland adjacent to the Converter Site boundary.

1.5 Supplementary Planning Documents and Technical Evidence

Substations and the Environment: Guidelines on Siting and Design – the 'Horlock Rules' (National Grid Company plc.)

- 1.5.1 These guidelines form the National Grid Company plc's (NGC) policy statement on the potential environmental effects of electrical substations as part of the development of energy infrastructure. Whilst not an NGC substation, the Proposed Development includes converter stations and will be part of the national electrical infrastructure, providing electricity to the national grid.

- 1.5.2 Section I, Paragraph 3 explains that the document details the approach taken to mitigate the effects of substation development. Paragraph 5, notes that in considering siting and design of substations, the most appropriate solutions will be achieved.
- 1.5.3 Section II NGC's Approach to Design and Siting of Substations, Paragraph 6 sets out NGC's environmental policy of giving due regard to protecting and enhancing the environment, to keeping known adverse effects to a reasonably practicable minimum, by taking reasonable steps to mitigate the effects of its proposals.
- 1.5.4 Section III Guidelines, Paragraph 1, Overall System Options and Site Selection, requires consideration to be given to environmental issues at the earliest stage, to keep adverse effects to a reasonably practical minimum.
- 1.5.5 Paragraph 2, Amenity, Cultural or Scientific Value of Sites, advises that developments should seek to avoid altogether internationally and nationally designated areas of the highest amenity, cultural and scientific value.
- 1.5.6 With regards to areas and features of local value, Paragraph 3 requires that *'important existing habitats and landscape features including ancient woodland, historic hedgerows, surface and ground water sources and nature conservation areas should be protected as far as is reasonably practicable.'*
- 1.5.7 Paragraph 4, Local Context, Land Use and Site Planning, advises that the siting of substation, extensions and associated proposals *'should take advantage of the screening provided by land form and existing features and the potential use of site layout and levels to keep intrusion into the surrounding areas to a reasonably practicable minimum.'* The proposed converter stations are located on a sloping site, and it is proposed to make use of cut and fill to create a landform that would in part screen these.
- 1.5.8 The guidelines require proposals to keep visual effects to a reasonably practicable minimum (Paragraph 5). The notes advise allowing sufficient space for screening of views by mounding or planting. The notes also advise the use of security measures which minimise visual intrusion from lighting. As the proposed converter stations and security fencing are to be set into the hillside, with planting around, and on, the proposed landform, potential light pollution will be kept to a minimum.
- 1.5.9 The design of the converter stations and ancillary buildings should be given early consideration, and be appropriate to individual locations, seeking to keep effects to a reasonably practicable minimum (Paragraph 7). The notes advise that:
- preference should be given to low-profile structures and silhouettes that are appropriate to the background (Note 1).
 - Use light-weight materials (Note 2).
 - Commission exterior design and colours appropriate to the surroundings (Note 3).
 - Materials and colours for buildings, equipment and fencing should be chosen to harmonise with local surroundings (Note 4).
 - Where possible site buildings to act as visual screens for switchgear (Note 6).
- 1.5.10 Paragraph 8 is concerned with using land effectively, limiting the area of development, whilst allowing enough space for appropriate mitigation measures, to minimise adverse effects on existing land use and public rights of way.

- 1.5.11 *'The design of access roads, perimeter fencing, earth-shaping, planting and ancillary development should form an integral part of the site layout and design to fit in with the surroundings'* (Paragraph 9).
- 1.5.12 Appendix A: NGC Substations – Environmental Report, sets out what an environmental appraisal of proposals for substations should contain. Section 1 lists the information required to describe the project at the construction phase and during the operational and maintenance phase. Section 2 requires a description of the site and its environment, as well as the relevant policy framework. Section 3 requires an assessment of effects on the surrounding area and landscape, this includes visual effects, effects of lighting and indirect effects. Section 4 lists mitigation measures, that might be taken to avoid, reduce or remedy those effects, including:
- a) *'site planning.*
 - b) *Technical measures e.g., ... containment (e.g., shielding of transformers and bunding).*
 - c) *aesthetic and ecological measures e.g.*
 - o *mounding, design, colour, landscaping, tree planting*
 - o *measures to ... create alternative habitats*
 - o *measures to safeguard historic buildings or sites.'*
- 1.5.13 The guidance contained within the Horlock Rules has been adopted during the design of the development and the landscape, seascape and visual resources chapter (Volume 4, Chapter 2 of the ES) includes those matters relevant to the assessment of the effects on landscape and visual resources.

Climate Emergency Declarations

- 1.5.14 Devon County Council declared a climate emergency on 21 February 2019. Torridge District Council declared a climate emergency on 1 July 2019. North Devon District Council declared a climate emergency on 24 July 2021.

British Energy Security Strategy

- 1.5.15 The British Energy Security Strategy (BEIS and Prime Minister's Office, 2022) recognises that green grids, interconnectors between different countries, transmitting renewable energy will form part of the UK's energy security strategy (International delivery, page 27). This is discussed in more detail in the Planning Statement.

North Devon Coast National Landscape

- 1.5.16 The North Devon Coast AONB Management Plan 2019 to 2024, sets out the objectives and policies for the National Landscape, for the duration of the five-year plan. Some of which are potentially in tension with the policies contained in the NPPF and the NPSs. Those that have the potential to be relevant to the landscape and visual impacts of the Proposed Development are set out below.
- 1.5.17 The Management Plan also comprises a list of special qualities and associated policies that fully illustrate the landscape features of the designated area. The identified special qualities include historic landscape patterns of hedge-banks,

farmsteads, hamlets, villages and lanes, panoramic views across rolling landscape of pastoral farmland, wooded combes and valleys from elevated inland areas and panoramic seascapes.

- 1.5.18 The relevant sections within the Management Plan, the special qualities and the associated applicable policies relevant to the Proposed Development are noted below.

Landscape and Seascape

- 1.5.19 The overarching landscape and seascape objective is to conserve and enhance the natural beauty and special landscapes of the National Landscape. Policies A1 to A5 set out the requirements to achieve this. Policy A1 is concerned with ensuring that the landscape character, natural beauty and special qualities of the National Landscape are conserved, enhanced and fully respected in all decisions affecting the National Landscape. Policy A2 is concerned with preserving the dark skies, peace and tranquillity of the National Landscape. Policy A3 requires both onshore and offshore developments to take account of open views, wilderness and maritime connections. Policy A4 recommends that no development takes place inside or outside the National Landscape that would harm the natural beauty and special qualities of the National Landscape. Policy A5 is to ensure that developments comply with the North Devon landscape and seascape character assessments.

Planning Development and Infrastructure

- 1.5.20 The overarching objective is to ensure that the planning process and infrastructure development protects and enhances the designated National Landscape and its special qualities. Policy I1 requires that planning policies and guidance must conserve and enhance the natural beauty and special qualities of the National Landscape. Policy I2 is concerned with promoting and enhancing local distinctiveness. Policy I4 is concerned with protecting and enhancing the marine and coastal environment.

North Devon UNESCO World Biosphere Reserve

- 1.5.21 The North Devon Biosphere Strategy for Sustainable Development (2014-2024) outlines specific policies and strategies over a period of 10 years to provide context for partners and stakeholders and deliver programmes and projects in support of the sustainable development of the Biosphere Reserve. The key relevant policies with respects to Landscape and Visual impacts are outlined below.

Environment

- 1.5.22 The overarching objective of the environmental policies is to conserve and enhance the natural capital and protect areas that are subject to climate change effects and pressure from development. It also notes that the semi-natural habitats are fragmented throughout the landscape which leads to low resilience for adaptation through climate change. Policy ENV3 seeks to ensure that developments should not be permitted which could result in the removal of critical natural sites and land-take by development. It also states that any such

development would be subject to a programme that ensures no net loss of ecosystem services and biodiversity through onsite design and offsite offsetting.

- 1.5.23 It is also noted within this section that in order to comply with carbon emission reduction targets to limit or avoid the effects of climate change, work should be undertaken on energy efficiency and energy production that does not do any harm to the seascape and landscape.

Neighbourhood Development Plans

- 1.5.24 The Landfall, the onshore HVDC Cable Corridor and the converter stations do not currently lie within any of the North Devon Neighbourhood development plans; however, the onshore HVDC Cable Corridor may temporarily be seen during the construction period from Bideford Civil Parish, which has a neighbourhood development plan.

1.6 References

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