

East Hampshire District Council

Local Impact Report

Section 60 Planning Act 2008



Aquind Ltd

Aquind Interconnector Project

Application for a Development Consent Order

Ref: EN020022

October 2020

1 Introduction

- 1.1 This report comprises the Local Impact Report (LIR) of East Hampshire District Council (EHDC). The Council is a host authority for a part of the development and is impacted by parts of the development that are outside of the EHDC administrative area, but which are adjacent to its boundary. A Relevant Representation has been submitted by the Authority. EHDC has taken into account the purpose of LIRs as set out in s60(3) of the Planning Act 2008 (as amended), DCLG's 'Guidance for the Examination of Applications for Development Consent' and the Planning Inspectorate's Advice Note One 'Local Impact Reports' in preparing this LIR.
- 1.2 EHDC has actively engaged with Aquind throughout the pre-application period and, at the time of writing this LIR, is continuing to do so and is evolving work on a Statement of Common Ground. There are however, various impacts that the Council is keen to emphasise through the LIR.
- 1.3 The key issues arising that form the focus of this LIR are:
 - Landscape impacts incorporating the design parameters;
 - Ecological implications;
 - Construction traffic and impacts on local amenity; and
 - Noise
- 1.4 An appraisal of the development against relevant Local Plan policy considerations is provided along with its view on impacts with regard to environmental, social and economic issues.

2 Site description

- 2.1 The proposal comprises a linear development, across several local authority areas. The part of the development that forms the focus of interest for EHDC is the area around the proposed Converter Station building, adjacent to the Lovedean electricity substation. The boundary of EHDC and Winchester City Council authority areas dissects the substation, approximately north/south, with the proposed access track and access arrangements at the junction area of Day Lane and Broadway Lane. The proposed Converter Station building would nonetheless be a substantial structure that impacts on the local landscape across the administrative boundary. Thus, the part of the development that is of particular interest to EHDC is that shown on Sheet 1 of the Land Plans (Document ref: 2.2)
- 2.2 The Converter Station area is a rural area comprising a mixture of arable fields, grazing paddocks, small woodlands and hedgerows and isolated and small groups of development. The Lovedean Substation is a dominant landscape feature, however, its visual impact in the local landscape is mitigated by mature trees that surround the majority of its sides.
- 2.3 At the broad landscape level, the Converter Station area lies to the west of the loosely linear range of suburban development that extends northwards of Portsmouth and to the west of the A3, incorporating Waterlooville, Hordean and Clanfield.
- 2.4 There is a clear transition in the landscape westwards of Horndean as development becomes fragmented along Lovedean Lane towards the substation. There is a solar farm to the southern side of Day Lane and together with the substation and associated overhead power-lines, there is a hardening of the landscape with such forms of infrastructure. However, the area surrounding the substation retain a rural character, reinforced by the proximity of the South Downs National Park to three sides. The area is consistent with the Downland Mosaic character type as defined in the East Hampshire Landscape Character Assessment. Although the substation area is in relatively close proximity to built up areas at Horndean and Denmead, there is little or no visual connectivity between them, which again reinforces the rural quality of the site.
- 2.5 The Landscape and Visual Amenity chapter of the Environmental Statement provides a baseline environment description of the area (15.5), which captures the relevant local landscape features and considerations such as local rights of way, historic landscape assets and the designated landscape, the South Downs National Park.

3 Statutory Development Plan

3.1 The Planning and Compulsory Purchase Act 2004 section 38(3)(b)(as amended) describes the development plan as those plans that have been adopted or approved in relation to that area. This LIR will set out only the Development Plan policy considerations pertinent to the EHDC host area. The relevant documents that comprise the East Hampshire District Development Plan are set out below.

- East Hampshire District Local Plan Joint Core Strategy, adopted May 2014
- The 'saved' policies of the East Hampshire Local Plan Second Review, adopted March 2006

The East Hampshire Landscape Character Assessment, July 2006

There are no Supplementary Planning Guidance Notes considered relevant to the scheme.

3.2 The key policies from these documents are as follows and will be used where applicable in this LIR.

East Hampshire District Joint Core Strategy

- CP1 Presumption in favour of sustainable development
The policy reiterates the presumption in favour of sustainable development set out in the NPPF. It states planning applications that accord with the policies in the Local Plan will be approved without delay, unless material considerations indicate otherwise.
- CP2 Spatial strategy
Directs development to the most sustainable locations in accordance with a settlement hierarchy.
- CP19 Development in the countryside
The approach to development in the countryside is to operate a policy of general restraint in order to protect the countryside for its own sake and the only development allowed in the countryside is that with a genuine and proven need such as that necessary for farming, forestry or other rural enterprise.
- CP20 Landscape
This policy sets out a number of criteria that seek to ensure the special characteristics of the District's natural environment are conserved and enhanced. These criteria include reference to protecting and enhancing local distinctiveness, sense of place and tranquillity by applying the principles of set out in the Landscape Character Assessment.

Development proposals are also required to protect and enhance natural features which contribute to the distinctive character of the District's landscape, such as trees, woodlands, hedgerows, soils and open areas. There is a requirement that development proposals incorporate appropriate new planting to enhance the landscape setting of new development using native species and which enhance biodiversity.

- CP21 Biodiversity
New development is required to maintain, enhance and protect the District's biodiversity. New development is required to ensure wildlife enhancements are incorporated into the design to achieve a net gain in biodiversity and ensuring any adverse impacts are avoided or appropriately mitigated for.

- CP26 Water resources / water quality
The part of the scheme within the EHDC area is a Groundwater Source Protection Zone so this policy is applicable. Requires new development to protect the water quality and quantity and make efficient use of water.

- CP27 Pollution
This policy states development must not result in pollution which prejudices the health and safety of communities and their environments. Development that may cause pollution will only be permitted if they are appropriately separated and designed to remove the risk of unacceptable impacts.

- CP28 Green infrastructure
Requires new development to maintain and enhance the network of new and existing green infrastructure and requires new green infrastructure to be provided on-site or through a financial contribution.

- CP29 Design
Includes a number of design based criteria development proposals are expected to accord with, including that it makes a positive contribution to the overall appearance of the area; takes particular regard to the setting of the South Downs National Park and is sympathetic in its relationship to landscape features.

- CP30 Historic environment
Requires new development to conserve and, where possible, enhance the District's historic environment.

- CP31 Transport
Sets out various criteria that promote sustainable modes of transport and that highway design meets the needs of all users of the highway. The volume of traffic generated must not harm the countryside or the rural character of local roads.

East Hampshire Local Plan Second Review

- T4 Protection of footpaths
States development will not be permitted where it would adversely affect the amenity of users of footpaths.

- UI1 New utility infrastructure in the countryside
Permits new utility infrastructure in the countryside if the proposal is an environmentally acceptable way of achieving the purpose of development; the amenity of nearby occupiers is not harmed; measures to ameliorate the environmental impact of the development are incorporated and the traffic generated is appropriate to local roads.

3.3 Emerging East Hampshire Local Plan

- 3.4 At the time of writing this LIR, the Local Plan remains at an early stage of preparation and the draft policies carry no weight. Public consultation has been carried out (Regulation 18), however, a draft plan is not expected until the end of 2021. The applicant has provided a list of the emerging policies in section 1.2.5 of Appendix 4 of the Planning Statement (Document ref: 5.4.4) and it is not intended to duplicate those here.
- 3.5 Moreover, in light of the White Paper, 'Planning for the Future' August 2020, there is further uncertainty about the progression of the Local Plan or what form it may take.
- 3.6 There are no Neighbourhood Plans pertinent to the scheme within the EHDC area.

4 Assessment of Impacts

4.1 Landscape impacts

- 4.2 At a national level, the site is within National Character Area 125: 'South Downs'. It recognises that the open landscape has been vulnerable to urban pressure, including from pylons and transport corridors and it notes that infrastructure development has the potential for significant impacts on landscape character, such as renewable energy.
- 4.3 The Hampshire County Integrated Character Assessment places the site within area 7h: South East Hampshire Downs. This defines the area as, "large scale downland is the predominant landscape type, typically with expansive, rolling arable landscapes and extensive wooded visual horizons." Such a description is relevant to the site as there are rolling arable fields surrounding the site with expansive views to the south.
- 4.4 The East Hampshire District Landscape Character Assessment (2006) places the area in the Downland Mosaic, which describes the landscape in similar terms to that above, adding that the arable fields are generally 18th and 19th century. The Landscape Character Area 3f: Horndean and Clanfield Edge lies to the east of the site and is characterised by *"urban fringe land uses and views to the development edge with relatively little woodland"*. It notes that settlements (Waterlooville, Cowplain, Horndean and Clanfield) follow the A3 and also notes electricity pylons to the north of the site. It is considered accurate to the site when it states, *"this is a highly varied landscape. This contrast between built development and arable land creates a landscape which is lacking in unity, a feature which is accentuated by the electricity pylons and roads that transect the landscape."*
- 4.5 There is some evidence of the varied nature of the landscape in the surrounding area, not just in the urban areas to the south, but in the pylons, equestrian uses, the solar farm to the south-east and the Lovedean Sub-station itself. The management strategy set out in the East Hampshire Landscape Character Assessment for the area is to seek opportunities for further woodland planting to soften, screen and contain development, to conserve the pattern of fields and seek opportunities to reinstate hedgerows.
- 4.6 The part of the site within the EHDC area comprises an agricultural field, enclosed to the north by trees and a copse that screen the Lovedean Electricity Sub-station. Whilst the sub-station is generally well-screened in the landscape, in terms of scale and associated pylons, it is nevertheless a significant feature within the landscape. The site is generally flat and occupies an elevated position. To the south there are expansive views and

the landscape is generally open and, despite the proximity of urban areas to the south, there is a strong rural character.

- 4.7 The development would impact on the landscape of East Hampshire and this will be broken into two parts. Firstly, the impact of the proposed track and access arrangements that falls within the EHDC administrative area and secondly, the impact of the converter station insofar as it impacts on the landscape setting of the area.

Access arrangements

- 4.8 The proposed access from Broadway Lane would result in the removal of a section of hedgerow and sections of hedgerow where access would be formed between Day Lane and Broadway Lane. The impact of forming an entrance on the western side of Broadway Lane would be the loss of a section of hedgerow that forms a linear feature of the landscape; the impact of this in isolation may be regarded as not having a significant adverse effect on the integrity of the hedgerow with appropriate mitigation planting, however, the impact would be accentuated by the replication of access between Broadway Lane and Day Lane, resulting in two further sections of hedgerow being removed. Cumulatively, these gaps formed in the hedgerows and the associated tracks, break up the continuity of the hedgerows as linear landscape features and appears over engineered.
- 4.9 The track from Broadway Lane dissects the field between Broadway Cottages and the public footpath to the south and the trees and substation to the north. It does not follow any existing landscape features and would be an exposed and isolated feature. Hedgerow planting either side of the track would mitigate the impacts, but nevertheless, the position of the track would be a negative change to the local landscape as it does not relate to existing landscape features.

The Converter Station

- 4.10 As outlined in the above appraisal of the sites' context, the Lovedean Substation and associated pylons in the area are prominent infrastructure features of the local landscape. Nevertheless, the local landscape is predominantly rural in character with a landscape character consistent with the landscape character assessments referred to above. Into this landscape, the Converter Station would impose a significant building(s) of a utilitarian form that are out of keeping in scale and form to this rural setting.
- 4.11 In terms of site selection, options A, B, C and D (Plate 3.3 Design and Access Statement) were discussed with the Applicant and EHDC concurs that

Option B (subject of this DCO) is the preferred option as the others are more isolated/exposed in the landscape, whereas option B is located in close proximity to the Substation and Crabdens Copse offers some established screening. There remain, however, some reservations that the initial siting exercise was limited to a 2km radius of Lovedean Substation. The reasons for this are understood (transmission losses along HVAC cables, wider cable easements etc) however, given the rural setting and the proximity of the South Downs National Park, there is concern that the setting of this designated landscape has not weighed appropriately in that process. EHDC supports the comments of the South Downs National Park Authority regarding the National Grid's duties under section 62 of the Environment Act 1995 and are not aware of any further information demonstrating that that duty has been met.

- 4.12 In an endeavour to seek assurances over the design of the Converter Station and to engage with the applicant over the parameters and design quality to mitigate its impact in the landscape, a number of design meetings were held (set out in the Design and Access Statement). Notwithstanding final design details and particularly the colour scheme for cladding of the buildings, these have been beneficial in fleshing out the impacts of the development in this location.
- 4.13 In views within the immediate East Hampshire area, the buildings would be visible from sections of Broadway Lane to the south-east and north-east, public footpath running east-west to the south of the Substation and a section of the Monarchs Way long distance footpath to the north-east.
- 4.14 During the construction period, visual impacts will be most significant in views from Broadway Lane and the public footpath to the south as well as from private properties on Broadway Lane. Although temporary and short-term, the impacts would be significant adverse impact from the current visual amenity of the area and the degree of tranquillity in the landscape. The appearance of security/construction fencing, compounds, plant, vehicles, welfare/office facilities etc would result in a significant change in the appearance of the area. The visual impacts would be localised however and more minor when viewed from receptor points in the wider EHDC area when the site appears a smaller part of the wider landscape and noting vegetation, topography or existing development. Nevertheless, the impact on recreational users of the footpath west from Broadway Cottages and the immediate area west of the site on Broadway Lane, would be highly visually intrusive in this landscape.
- 4.15 During the operational stage, the most notable views of the Converter Station from within the EHDC area would be similar to those identified above. Roadside vegetation on Broadway Lane together with intervening

trees, development or topography would act to screen the majority of the built form of the Converter Station. mitigating planting to infill gaps/weak sections of roadside hedging would take time to mature and take effect, but would further ameliorate views. From the south-east, Crabdens Copse provides established screening and is reasonably dense, however during winter months, views of the building would be more apparent and more so from the public footpath south of the Substation where there is no other intervening vegetation to obscure views. From here, the access track would appear a visually arbitrary landscape feature, unrelated to established landscape features. There would be some improvements however as a result of the landscaping to form the calcareous grassland and mitigating planting/hedgerow features.

- 4.16 From a section of the Monarchs Way long-distance footpath to the north-east, there would be views of the Converter Station buildings. Such views would be transient but visually intrusive in this rural landscape. It would be seen in combination with pylons, resulting in a combination effect of infrastructure/industrial forms of development in the countryside, but at a distance of approximately 600m with some intervening tree/hedge cover means the degree of harm to the experience of walking the footpath would be moderated.
- 4.17 It is important that the roof remains clear of plant or any visible equipment that may be visible, including from higher ground to the north to ensure the building has clean lines and not cluttered that would be visually distracting and draw the eye. The number of lighting columns is considered excessive given the Converter Station would not be manned and access needed only for infrequent maintenance or emergencies.
- 4.18 From a landscape perspective, there is a preference for Option B(ii) as it groups the Converter Station closer to the Substation and retains a hedgerow. Decommissioning should ensure the removal of the buildings and removal of hardsurfacing and fencing etc
- 4.19 To summarise landscape matters, the Converter Station would have a harmful impact on both the local landscape character and the visual experience of the local landscape. These impacts would be mitigated by the infrastructure already in place at the Lovedean Substation and associated pylons and also by the presence of trees and intervening hedgerows from receptors points within the EHDC area. The effect of this screening needs substantiating through further mitigating planting which would take several years to take meaningful effect.
- 4.20 The Needs Benefits Report and Chapter 25 of the ES addresses the socio-economics of the development. It correctly identifies policy CP5 of the East

Hampshire Joint Core Strategy, which concerns employment and workforce skills. It states planning permission will be granted for development that improves workforce skills and employability; secures local skills and training provision and employment on significant development, particularly with regard to construction skills. For such a scale of development, we would look to enter a legal obligation to secure such measures.

- 4.21 There are not considered to be any benefits to the East Hampshire local economy during the operational stage.
- 4.22 During the construction phase, paragraph 25.4.3.2 & 3 of Chapter 25 of the ES state that specialist contractor workers are required and that 'the majority of employment will not be local'. It adds though that local workforce will be used where possible. Whilst understanding of the need for specialist contractors, greater endeavours should be made to source and secure local employment for at least operations where specialist work is not needed. Otherwise, there is little or no local economic benefit to the local economy during the construction phase. There would likely be some local spend from construction workers, though local convenience stores in Lovedean Lane/Milton Road are multiple-stores with low residual benefits to the local economy. Horndean may provide some accommodation for construction workers, but there is limited availability to suggest there would be any meaningful local benefit.
- 4.23 Economically, there are few business or recreational or community facilities that would be harmed during the construction phase in view of the cable routing and location of the Converter Station; however, there would be negligible economic benefits to the local area/District, hence the need for a mechanism to secure local training/construction jobs. The local area, would, however, suffer significantly socially from disturbance during the construction phase.
- 4.24 EHDC defer to Hampshire County Highway Authority on highway matters resulting from traffic during the construction phase. But there would also be a social impact arising in terms of noise, disruption, pollution and fear/perceptions arising from the additional traffic generation. The areas within the EHDC area critically effected are residential properties on Boundary Lane, Day Lane, Lovedean Lane. In this regard the contents of the Framework Traffic Management Strategy (FTMS) and the Construction Traffic Management Plan are noted and read in conjunction with Chapters 22, 23 and 24 of the ES.
- 4.25 The Community Strategy (2.8 of the FTMS) is important in raising awareness and good communication with affected residents/communities and also to minimise demands on the Council's monitoring and enforcement

team. The construction phase is anticipated at three years and Lovedean would see not just construction traffic associated with the Converter Station, but work parties heading out to sections of the cable route. This is a not insignificant period of time where residents would be subject to construction traffic, with traffic likely arriving from 7am to start-up in advance of works commencing from 8am. The Council has resolved to grant outline planning permission for a development of 56 dwellings on land west of Lovedean Lane (ref: 54139/001), which would likely result in significant cumulative impacts on residents of Lovedean Lane.

Summary

- 4.26 There remains some concern at the lack of evidence regarding the consideration of the South Downs National Park in the selection of Lovedean as the location for the Converter Station. The buildings would impact harmfully on the rural landscape character and harm the visual amenity of the local area, although it is recognised that existing infrastructure and mitigating planting (existing and proposed) would mitigate the impact in both character and visual terms.
- 4.27 The construction phase would have the most significant impact in terms of landscape impact, but also on the local population from noise and the traffic generation over a sustained period of time. The same affected local population, however, currently would not see any benefits arising economically including through local employment during the construction phase and no social benefits.