

The Planning Act 2008, Section 89, and The Infrastructure Planning (Examination Procedure) Rules 2010, Rules 8, 9 & 13

Application by AQUIND Limited for an Order Granting Development Consent for the AQUIND Interconnector Project

Written Representation on behalf of

APLEAL – Community Action Group

Registration Number - 20025022

Further to our representation filed on 11th February 2020, APLEAL would also like to add the following to our list of concerns and reasons for strongly objecting to the proposed development:

1. Landscaping

The landscaping in general that is proposed to attempt to hide the Interconnector Station in Lovedean and mitigate the disastrous effects that such a large development will have on the surrounding countryside is woefully inadequate. The trees that are suggested for planting, even after 20 years, will not be tall enough to stop the station being in view for any nearby residents or members of the community enjoying the wide, open views that are so integral to the local landscape. There is also inadequate proposed planting of hedgerows, particularly alongside Broadway Lane and Old Mill Lane, that will be needed to avoid loss of amenity for anyone walking, riding or cycling in these quiet lanes. Should the project be approved and go ahead despite the many objections being raised, we would like to insist that even before construction begins, many more mature trees and hedgerows are planted to help shield the view of the Interconnector Station. This would help increase local biodiversity.

We would also like to raise the following specific concerns regarding maturity timescales and upkeep of the proposed landscaping.

Maturity Timescales

Reference: Environmental Statement – Volume 1 – Chapter 15 Landscape and Visual Amenity Document Reference 6.1.15

Section 15.8.4.14

The above reference includes the statement:

“Infrastructure: By year 10 the surface and planting would have softened the Access Road both west and east of Broadway Lane.”

This is the only indication in the documents related to landscaping that a specific time period to achieve what it terms ‘softened’ is given. The concern raised here is that without a specified period as measured from a particular milestone there is no way to state what will be achieved by when. It is not unreasonable to require that trees and shrubs should be subject to a maturity date of 5 years from the start of construction, the exception being the 25 metre high specimens trees to be planted adjacent to the Converter Hall.

Landscape Upkeep

Reference: Outline Landscape and Biodiversity Strategy

Document Reference 1.10

- i) Section 1.7.2 Management Responsibilities
- ii) Appendix 1 Outline Landscape Specification Years 0 – 5

The landscape upkeep implies that upkeep will be limited to 5 years, see 1.1.1.1 which states: 'This timescale is based on a standard defects liability period.' This refers to the Upkeep Plan being limited to years 0 – 5. However, the Convertor Station and its associated plant is a wholly owned private enterprise. Hence it would be unreasonable to limit the landscaping effectiveness to 5 years.

Furthermore, there is no performance specification, which could be used to assess the quality of the landscaping. Nor is there any scope for interested bodies and individuals to engage with the landscaping management.

2. Traffic and Transport

The proposed plan for access to the site at the top of Day Lane is extremely dangerous. This is the primary route for construction traffic to enter the site and Day Lane will become even more hazardous for pedestrians, cyclists, horse riders and even motorists than it already is. Currently there is no footpath here and the road is not wide enough to safely accommodate lorries and other users. At the very least, the proposed plans should include provision for a footpath or pavement all the way along Day Lane to allow local residents, walkers and riders, to continue to use this road.

Reference: Environment Statement – Volume 1 – Chapter 22 – Traffic and Transport
Section 22.4.5.19 Part of 'Cyclist and Pedestrian Amenity'
Section 22.6.5 Section 1 – Lovedean (Convertor Station Area)

Based upon an estimate that the increased traffic flow will be less than 20% during the construction phase and the use of the GEART guidelines, it is concluded that cyclists and pedestrians will suffer no loss of amenity. However, this does not address the specific issues associated with Day Lane and the junction with Broadway Lane.

Day Lane is a country lane with no white line and no accommodation for pedestrians, cyclists or even horse riders. All these are users of Day Lane. The lane has room for only two vehicles to pass. The lane has a number bends, which are a particular danger to pedestrians as there is no refuge off the road. These specific features do not it appears to have been considered in analysis. As a result, no action is proposed to protect this group of users.

To resolve this conflict and potential danger, it is **strongly recommended** that an alternative route is provided for these sensitive users (pedestrians, cyclists and horse riders). This will run from the Broadway Lane junction down to Lovedean Lane and alongside Day Lane.

Furthermore, an alternative route for sensitive users should be provided in the vicinity of the junction of Broadway Lane and Day Lane. This to ensure those users are kept apart from construction traffic.

This is a Health and Safety issue and must be redressed urgently as it will have repercussions of the DCO Limits

3. Noise & Vibration from Interconnector Station

The cumulative affect on the health and wellbeing of all those who will be adversely affected by any level of noise pollution and vibration nuisance, however big or small, as a result of both the construction and the operation of the Interconnector Station, should not be underestimated. We understand that the written representation from the Campaign for the Protection of Rural England covers this in much greater detail, and as local residents who will all be affected to various degrees, we would like to add our concerns to theirs on this crucial issue.

APLEAL Community Action Group

6th October 2020