

From: [Mike Hughes](#)
To: [Aquind Interconnector](#)
Subject: Aquind Interconnector Project: SDNPA Submission for Deadline 1 - Written Representation
Date: 07 October 2020 10:29:53
Attachments: [image001.png](#)
[2020-10-06 Written Rep.pdf](#)

Dear Sir/Madam,

Please find attached the SDNPA's written representation on the this project. I sincerely apologise that it is submitted a few hours late.

Please do not hesitate to contact me should you require anything further.

Thank you.

Mike Hughes
Major Planning Projects and Performance Manager
South Downs National Park Authority

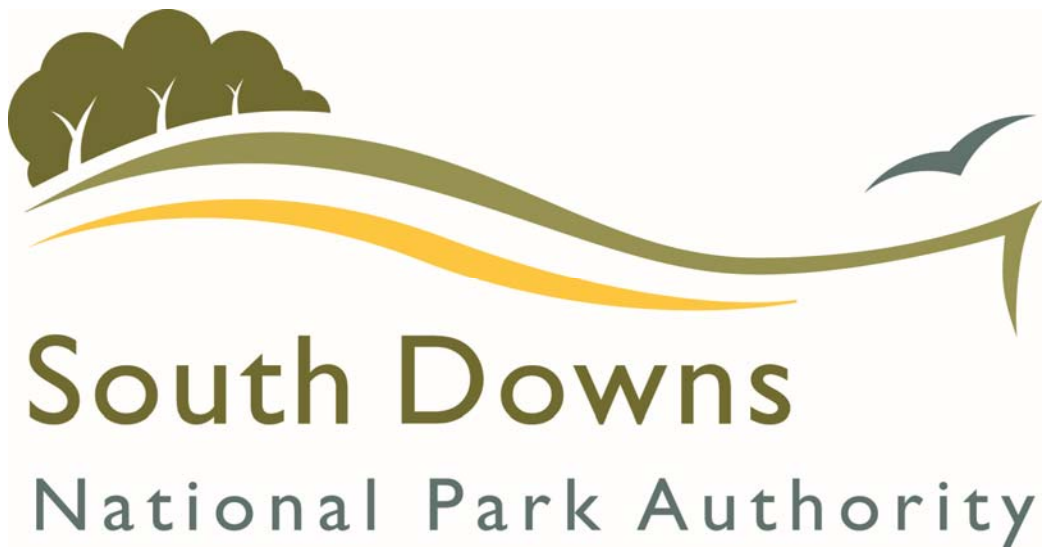
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SOUTH DOWNS
NATIONAL PARK
CELEBRATING 10 YEARS



Aquind Interconnector

Written Representation



October 2020

I. Summary

1.1 The South Downs National Park Authority (SDNPA) objects to the proposal for the development of a Converter Station in close proximity to the National Park and the associated Development Consent Order (DCO) application on two grounds:

- i) Based on the limited information provided, that the selection of the site for the Converter Station has not been taken with regard to National Park purposes, as required by Section 62 of the Environment Act, 1995.
- ii) That the development proposal (namely the Converter Station and associated above ground development) would cause significant harm to the setting of the National Park in relation to landscape character and visual amenity and to views to and from the National Park. In light of the statutory and policy protection for National Parks this is a significant issue for the application and could justify withholding development consent.

1.2 Notwithstanding this objection, the SDNPA is working proactively with the applicant to address the following additional matters:

- The design of the Converter Station Buildings
- The design of the proposed new 1.2km access road
- Ensuring that lighting used during construction and operation preserves dark night skies in the National Park (an International Dark Night Sky Reserve)
- To consider any noise impacts on the National Park

2. Introduction

2.1 This written representation is submitted by the South Downs National Park Authority (SDNPA) in response to the application by Aquind to construct a converter station, access road and construction compound with associated landscaping in close proximity (on three sides) to the National Park's boundary.

2.2 The South Downs National Park contains over 1,600 sq. km of England's most iconic lowland landscapes, stretching from Winchester in the west to Eastbourne in the east. It is one of ten National Parks in England. The South Downs National Park Authority (SDNPA) is the organisation responsible for promoting the statutory purposes of the National Park and the interests of the people who live and work in it.

2.3 This written representation should be read in conjunction with:

- i) SDNPA's Local Impact Report (LIR)
- ii) SDNPA's response to the Examining Authority's questions, reference ExQ1
- iii) The forthcoming draft Statement of Common Ground between the applicant and the SDNPA

2.4 As set out in paragraph 23.2 of the Planning Inspectorate's Advice Note 2, cross reference to the above documents is encouraged in order to assist in keeping submissions as concise as possible and to avoid repetition.

2.5 This written representation concentrates on those parts of the DCO application to which the SDNPA objects and those issues which, in the Authority's view, remain outstanding or unresolved. Matters of agreement are recorded in the draft (and separate) Statement of Common Ground.

3. National Park Purposes

3.1 The statutory purposes of the National Park are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.
- To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

3.2 In addition, Section 11A of the National Parks and Access to the Countryside Act 1949 (as inserted by Section 62 of the Environment Act 1995) requires all relevant authorities, including statutory undertakers and other public bodies to have regard to these purposes. This requirement therefore applies, amongst others, to both National Grid and the Planning Inspectorate.

3.3 National Parks have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty (Overarching National Policy Statement for Energy (EN-1), 2011, paragraph 5.9.9 and NPPF, 2019, paragraph 172).

3.4 The Overarching National Policy Statement for Energy (EN-1) states at paragraph 5.9.12 that the duty to have regard to the purposes of nationally designated areas, such as National Parks, also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. Paragraph 5.9.12 states that the aim should be to avoid compromising the purposes of the designation and that development proposals should be designed sensitively given the various siting, operational and other relevant constraints.

4. The Authority's View of the Proposal

4.1 This section is set out in the following order:

- SDNPA objections to the proposal
- Matters on which the Authority is undertaking further work with the applicant
- Comments on the draft Development Consent Order

SDNPA Objections to the Proposal

Apparent lack of consideration of National Park Purposes during the selection of the Converter Station site

4.2 In 2014 a preliminary technical-economics study looked at the options available to connect the UK with the electricity grid of another European Union member state. This took into account the technology available and commercial feasibility. A connection from the UK to France was subsequently favoured. It included the selection of the south coast of England as the point at which the connection should be made to the electricity transmission network.

4.3 Aquind subsequently requested that National Grid undertake an Electricity Transmission Study (2014/15). This study sought to identify the available level of entry capacity in the transmission network along the south coast.

4.4 National Grid identified 10 substations which could accommodate the Interconnector, of which 7 were then rejected (paragraph 2.4.2.4 of Chapter 2 of the Environmental Statement, examination reference APP-117). Limited information is provided on the

metrics used and considerations made in this selection process. However, National Grid is a Statutory Undertaker and therefore is required to have regard to the purposes of the National Park under section 62 of the Environment Act 1995. There is no evidence of how that duty has been met in the consideration of the various sites and how this was weighted against other considerations. Access to the contemporaneous options appraisal (or similar) undertaken at the time would be helpful.

- 4.5 Of the 3 remaining substations, one was then rejected as it would require a rebuild of the substation and additional reinforcements of the wider network. However, this site in Chickerell sits within a more urban location than the current development proposal, it is not adjacent to a National Park and is over 1km from an Area of Outstanding Natural Beauty. Again there is no indication here of how the duty to have regard to the purposes of the National Park was considered in this process, much less met.
- 4.6 The location of the Converter Station was narrowed down to just Lovedean and Bramley (north of Basingstoke). The National Park Authority accepts that to access Bramley would require a DC cable to be taken through the National Park which would require a trench approximately 7m wide, giving rise to significant impacts on the National Park.
- 4.7 The assessment of alternatives in the Environmental Statement also considers the potential location of landfall sites. For clarity, the SDNPA has no comments to make on this matter, nor does it in relation to the onshore route of the cable from landfall to the proposed converter station. These are all well beyond the boundaries of the National Park.
- 4.8 In the Planning Inspectorate's December 2018 Scoping Opinion (APP-366) it states on page 98, under the heading 'Consideration of alternatives' (emphasis added):

*In accordance with Schedule 4 of the EIA Regulations, it is rightly stated that the ES will contain reference to alternatives. Reference is made at (3.10.2) to a summary being provided in the ES of reasons for the selection of the final development design and a description of design alternatives. This is welcome but it rather underplays the need for fully evidenced reasoning for site selection and reasonable alternative sites. It is understood that the Lovedean substation offers a technically available connection option in terms of a strategic location in the south of England, but the option sites as presented comprise generally open countryside on elevated ground in close proximity to the South Downs National Park and within a Groundwater Source Protection Zone. **Evidence should be submitted demonstrating what alternative sites for the converter have been considered that may have a less sensitive impact on the environment, particularly landscape and visual impacts. This issue is particularly important in relation to the setting of the South Downs National Park.***

It is understood a position close to the substation is required so as to reduce the length of AC cables between the converter and the substation (due to efficiency and trench requirements of DC cables), however, similar systems at Daedalus (Fareham) and the FAB Link at east Devon comprise much greater lengths of AC cables (approximately 5km in the case of the FAB Link) and that raises the question of whether alternatives further south of Lovedean may be more suitable.

- 4.9 Despite this Scoping Opinion limited information has been provided in this respect and SDNPA query whether the site selection process was a purely commercial decision. In fact paragraph 2.4.2.13 (examination reference APP-117) appears to confirm this and reads (emphasis added):

*“Whilst the Applicant contributed to NGET’s consideration of the substation connection options, the final choice of a connection point was determined by National Grid, who **concluded that a connection to Lovedean Substation was the most efficient, coordinated and economical grid connection point.**”*

- 4.10 Based on the limited information provided SDNPA cannot determine that proper regard has been had to the Purposes of the National Park in accordance with S62 of the Environment Act, 1995. This is important as, i) this legislation is a statutory protection for National Parks and, ii) given the significant landscape harm caused by the development (see below). The SDNPA therefore currently objects to the development proposal on these grounds and looks forward to reviewing the further information on this matter to be provided by the applicant at Deadline 1.

Landscape and Visual Impact

Summary

- 4.11 A summary of SDNPA’s concerns in respect of landscape and visual impact is as follows:
- i) The adverse impact from siting buildings of the large size and scale proposed so close to the National Park (within the National Park’s setting). The proposed Converter station buildings are significant both in terms of footprint and height.
 - ii) The functional and utilitarian appearance of the buildings will be prominent and will have the effect of changing the character of the landscape and the perception of it when viewed from the SDNP from one with a rural character to one which is far more industrial.
 - iii) The Converter Station will be visible in both close range views and those from higher locations within the National Park looking towards Portsmouth and the South Coast. The Converter Station will harm local views out of the National Park, including from Monarchs Way (a long distance trail).
 - iv) The long access track proposed (1.2km long and up to 7.3m wide) will widen the extent of the land directly impacted by the development beyond the immediate confines of the proposed buildings (including providing a further urbanising access to Broadway Lane, which is currently rural in character).
 - v) Adverse impact of the Converter Station and associated development on the tranquillity of the National Park (one of its special qualities)
 - vi) A lack of information about the design and appearance of the Converter Stations, leaving most of this to post approval consideration. In respect of the building design the applicant has focussed attention on the colour of the proposed building which, although important, taken on its own only has a small influence on assimilating a very large building into the National Park’s setting.
 - vii) Concerns about the landscaping strategy proposed, including that not all of the proposed mitigation areas appear to be in the applicant’s control, the lack of a strategy to deal with Ash die back and the need to use a bigger range of

planting sizes to help provide screening at an earlier stage.

Landscape Character

- 4.12 The applicant's Landscape and Visual Impact Assessment (LVIA) is quick to scope out the National Character Areas (NCA) as part of the baseline assessment and this is queried. In particular with reference to the NCA125 – South Downs. This NCA is 90% contained within the designated landscape but also includes the proposed interconnector site. It is suggested that there are sections of the character description which would be helpful and provide high level structure to the character baseline assessment in the LVIA.
- 4.13 The NCA description understandably emphasises the importance of this landscape and the SDNP. In relation to landscape change for example, on page 36, it states that:

The open landscape has been vulnerable to urban edge pressures extending from the heavily built up coastal fringe onto the Downs, as well as from prominent communication masts on exposed skylines and from pylons and transport corridors in the principal chalk valleys.

- 4.14 The LVIA does not give due weight to the sensitivity of the existing landscape character in this location in considering the proposals – this landscape is recognised in the South Downs Integrated Landscape Character Assessment (SDILCA) as being under considerable developmental pressure due to incremental change, which this development proposal would substantially add to. The following development management recommendation is made in the SDILCA (page 149) which specifically refers to this area of the setting of the National Park, but it has not been referred to or included in the LVIA:

Monitor incremental change on the edge of Horndean, consider improved integration and prevent urban overspill into this character area to maintain the tranquil, rural character of the downs.

- 4.15 The LVIA also fails to acknowledge the relationship between the LCAs of the various authorities (i.e. East Hampshire and Winchester) and, in particular, the relationship with the SDILCA. Landscape character is not confined to or defined by the boundary of the SDNP. The boundary of the SDNP identifies the edge of the National Park, not a change in landscape character (although that can happen).

Visual impact of the proposed Converter Station

- 4.16 The proposed Converter Station development is significant both in term of its footprint and height. The extent of this is immediately apparent in the wireframe photomontages particularly from within, and on, the boundary of the SDNP. There are no comparable built forms within the landscape at this elevation on the Downland Mosaic Landscape Character Area and the buildings would appear alien and overdominant.
- 4.17 The buildings would have a functional and utilitarian appearance which will be very prominent and, although close to the existing substation, will not be seen against a

backdrop of other industrial or urban development. The buildings will in many places be higher than the proposed trees to be planted and the effect of the screening is to merely foreshorten views. Overall, the effect of the building and landscaping will be to change the character of the landscape and the perception of it when viewed from the SDNP from one with an essentially rural character to one which is far more industrial. This is clearly shown in the view from Portsdown Hill (Viewpoint 9) and viewpoint 2 photos which both illustrate how large the building is within the foot slopes of the Downs where there are no other buildings visible at that scale. Viewpoint 2 shows clearly how the scale of the building is unrelated to the surrounding settlement scale. It would therefore appear incongruous and intrusive.

- 4.18 The applicant has used the presence of the existing substation as a detrimental impact to justify the proposed buildings - however the applicant's own assessment identifies the existing substation as being 'well screened by a belt of deciduous woodland' (LVIA paragraph 15.5.3.59). The size, scale and appearance of the existing substation is not comparable to the proposed interconnector building.
- 4.19 The assertion is made in the LVIA (paragraph 15.5.3.67) that any view from within the SDNP which is panoramic is not significantly impacted because viewers can look at some other part of the view instead. This does not take account of the transition of character in these views from the human activity around Portsdown Hill and its visual relationship with Portsmouth to the lower and upper slopes of the South Downs where there is little evidence of human activity in the views. That transition is what makes these views so key in the setting of the SDNP.
- 4.20 Regarding views from the scarp slope (paragraph 15.5.3.67) providing an alternative view, this is not the case. Views over the scarp are unrelated and in separate locations to those over the dip slope. On Butser hill for example the views are not 360 degrees from the top. They are focussed sequentially in a particular direction because the top of the hill is large and very slightly domed. When at the top of the scarp slope it is very unusual to have views simultaneously to the north and south and this does not occur in the Hampshire Mosaic LCA.
- 4.21 There are instances where the combination of views of the converging pylons and the proposed buildings are likely to cause significant impact on views, for example from Viewpoints A, C, 4, 10 and 14. The proposed buildings are particularly incongruous in these views owing to their scale which rises well above surrounding mature trees and woodland due to the buildings' height and extent. Viewed against the height of the pylons the buildings appear even larger thereby increasing the sense of being completely unrelated to the surrounding landscape pattern.
- 4.22 The viewpoint assessment included in the LVIA (Appendix 15.6 Visual Amenity) describes the 17 representative viewpoints for the Converter site and the 3 photomontages. 8 of the 17 viewpoints are within the SDNP. All of these 8 viewpoints and the 3 photomontages show the converter as being visible to varying degrees from within the National Park. In many of these views the backdrop is the coastal plain and views over the coast to the Isle of Wight, Portsmouth, Portsdown Hill, Farlington Marshes and Langstone Harbour AONB. The presence of the building would periodically block these views in itself, but it is the proposed mitigation planting to screen the proposed converter which will block views more consistently towards the south along the dip slope of the Downs to a greater degree. Viewpoint C clearly shows this – from Monarchs Way.
- 4.23 Of further concern is the proposed long access track (1.2km long and up to 7.3m wide) which will be retained after construction is complete. It will widen the extent of the land directly impacted upon by the development beyond the immediate confines of the site itself. It will:

- i) Cut across historic field boundaries and run through the centre of fields, contrary to their character, dissecting the inherited field pattern and being more obvious in views compared to if existing hedgelines/field boundaries were followed.
- ii) Negatively affect the character of Broadway Lane – becoming more industrial and less rural/agricultural and introducing another access point which alongside the proposed battery storage may lead to three vehicular accesses within approximately 100m.
- iii) Prevent the re-connection/improvement of nationally important habitats (Ancient Woodland).

Impact on the Monarchs Way

- 4.24 The Monarchs Way is a long distance trail and is therefore considered to be of a higher status and a more sensitive receptor than a standard PRoW. It runs from the more urban communities in the Horndean area giving residents direct access into the National Park. It is clear that this proposal will negatively impact on the experiential impacts of walkers by introducing an industrial scale building into the rural area through which this path runs; the impact of which will be longer lasting than the actual duration of view.

Landscape Design

- 4.25 The SDNPA wish to make the following points on this matter:
- iv) It would be helpful if the colour selected for the Converter Station buildings were more recessive and also responded to the height of the building by perhaps greying out colours towards its top. The building is viewed from all sides and this makes it problematic to select one colour swatch for all sides. It is suggested that the approach is developed with more nuance and relation to the direction of sunlight, shadow, backdrop, skyline and view orientation. Each side of the building may need a different colour approach in order to successfully integrate it into the landscape.
 - v) There is a large amount of landform change to achieve the building platform, for the Converter Station buildings which is set at 85m – this means that the platform is half cut (north) and half fill (south). It is unfortunate that the building could not be set lower in the landscape to help ameliorate the extensive height of the building.
 - vi) The landscape mitigation proposals are relatively complicated and we would suggest that additional new woodland planting is proposed. For example, whilst the limitations on woodland planting along the perimeter security fence are acknowledged, this does not preclude more significant woodland planting further away.
 - vii) We recommend the new hedgerows which currently serve to accentuate the proposed access drive should be more closely aligned with the existing field pattern.
 - viii) The treatment of the western/northern boundary is very rectilinear in

contrast to the surrounding field patterns & will not provide a seamless interface between the new and the existing landscape pattern.

- ix) The LVIA acknowledges the impact that the proposed new entrance(s) off Broadway Lane will have and the design of the entrances should take account of this. At quarry entrances, for example, it is desirable to limit views down into the site and entrances are designed to have bends which limit these views. Careful design of entrances to reduce the scale is required with security measures set back from the access point. Realignment of Hinton Daubney Lane to achieve access adds further to the cumulative creep of industrial scale features, and loss of historic character in this landscape of narrow lanes.
- x) We would ask whether some of the areas of remaining arable farmland remain viable for agriculture. If they are not they could be more usefully converted to (wooded) pasture which would be in accordance with LCA and catchment guidance.
- xi) In Appendix 15.7 to the Environmental Statement (examination reference APP-405) all of the planting is proposed at installation to be 2 year old whips and feathered stock. Typically for large infrastructure schemes a wider range of heights and sizes would be planted to achieve an improved screening effect. It is requested that standard, heavy standard and extra heavy standard trees are included in the woodland blocks (not only as specimen trees) to broaden the age of the stand, increase the range of canopy height and provide instant screening and structure planting during the early years of the project.
- xii) The applicant has provided no evidence of how they will manage and pro-actively deal with Ash die back.
- xiii) It appears that not all of the landscape mitigation areas are in the applicant's control so we question how it will ensure continued management of these areas for the purposes of mitigation. In addition, no assessment appears to have been made of the age, condition or species of trees in the existing areas to be used for mitigation.
- xiv) Limited detail is provided in respect of the proposed landscaping bunds referred to in the draft Development Consent Order (APP-019) at page 38. Landscaping bunds would not be a characteristic intervention in the landscape here.

SDNPA comments on Appendix 15.5 South Downs National Park (APP-403).

- 4.26 This document is a response to the location of the proposed convertor station within the setting of the South Downs National Park. It is not supported by a local landscape character assessment, choosing instead to refer to the SDILCA and the spatial portrait set out in the South Downs Local Plan. It also refers to the SDNPA's Partnership Management Plan but does not respond to the policy or outcome aspirations set out in the plan.
- 4.27 In terms of an assessment process the document concentrates on considering the presence of designation criteria for protected landscapes within the study area of the LVIA. This is looking purely at landscape quality and is not a landscape character approach and is not helpful in considering whether the proposal will conserve and enhance the National Park. Much of the landscape referred to is not within the

National Park and it is logical that the landscape beyond the boundary does not meet the designation criteria. What is relevant is how the landscape character and intervisibility of the setting of the SDNP is affected by the proposals.

- 4.28 It would be helpful if the study:
- i) Identified detracting influences within the setting of the SDNP;
 - ii) Assessed whether the proposals would add to these detracting influences;
 - iii) Measured whether there are likely to be direct and cumulative effects;
 - iv) Considered how the proposed convertor would assist with mitigating for the direct and cumulative effects.
 - v) Demonstrated how the proposals would conserve and enhance the SDNP

SDNPA Comments on Outline Landscape and Biodiversity Plan

- 4.29 It is noted where the retention of existing hedgerows, hedgerows with trees and areas of woodland is proposed. However, some of these features are of variable quality and we support the inclusion within the landscape mitigation plan of the intention to improve these existing hedgerows, and would wish to see similar action in areas of existing woodland where replacing lost, dangerous or dying trees would be of benefit to biodiversity (and screening).
- 4.30 A new native hedgerow is proposed to the north of the convertor station linking an area of National Grid mitigation tree planting to the east with an existing hedge to the west. This would appear to be an opportunity to create a far deeper hedge or include further woodland planting.
- 4.31 We are concerned about the new hedgerow with trees shown on the southern edge of the new roadway. This introduces a lengthy linear feature into the landscape running parallel with the track and footpath. We would like to see this feature 'broken up' with consideration given to the introduction of areas of woodland planting which may create more of a linear copse.
- 4.32 We are not clear why the new woodland planting area to the immediate south of the most southerly attenuation pond appears to leave the potential for a line of sight from the residential area to the south up the line of the access towards the convertor station.
- 4.33 Mill Copse to the north-east of the site partially restricts views from the SDNP towards the convertor station and existing sub-station but is not within the red line boundary and we query why this is the case.

Matters on which the Authority is undertaking further work with the applicant

Design of the Convertor Station Buildings

- 4.34 The SDNPA has taken part in a number of discussions with the applicant and neighbouring local planning authorities on the design of the Convertor Station buildings. This is without prejudice to the SDNPA's view that this element of the proposal harms landscape character and the setting of the National Park and that a lack of information about the design and appearance of these buildings in the application leaves too much, in SDNPA's view, detail to post approval consideration.
- 4.35 The SDNPA has been participating in these discussions in order to try and mitigate the visual harm the buildings will cause. A recent focus of discussion has been the

colour scheme of the proposed Converter Station buildings. We have asked the applicant to carry out further work on this (which they have agreed to) thus this matter is still under discussion.

Design of the proposed new 1.2km access road

- 4.36 Further discussions are being held in respect of the new access being created opposite the National Park and the 1.2km long, up to 7.3m wide access road. Currently this results in the loss of rural lane character which is marked in this location/part of Hampshire.

Dark Night Skies

- 4.37 As set out in our Local Impact Report the South Downs National Park is an International Dark Sky Reserve and was designated as such in 2016.
- 4.38 The SDNPA is in discussions with the applicant on appropriate mitigation measures in respect of lighting for construction and for the operation of the Converter Station buildings, together with how these measures might be secured.

Consideration of any noise impacts on the National Park

- 4.39 In relation to the operation of the Converter Station the SDNPA is in further discussions with the applicant and local authorities with Environmental Health expertise to ensure that:
- i) The development will not cause harm to residents within the National Park
 - ii) The development will not cause harm to tranquillity by reason of noise disturbance.

Comments on the draft DCO

- 4.40 The SDNPA has made detailed comments, including proposed revisions, concerning the DCO requirements in its Local Impact Report and these comments stand. Further comments on the DCO requirements are also given in SDNPA's response to the Examining Authority's questions, reference ExQ1.

5. Conclusion

- 5.1 The SDNPA does not support the DCO application, as it currently stands, for the reasons given above.
- 5.2 However, the SDNPA will continue discussions with the applicant in an attempt to address the issues raised in this written representation and will continue to engage positively in the examination process.