

# **Historic Environment**

# Planning Consultation Comments - <u>DRAFT</u>

RE: 19/00522/NSIP Proposal Site: Potential Aquind Interconnector Site, Old Mill Lane, Lovedean, Denmead

**Consultation response:** No objection subject to the following being satisfactorily controlled by condition;

- All design matters; appearance, materials and finish, layout, scale and full
  details, including confirmation of height and location of all telecommunications
  infrastructure such as ariels etc that may be added to the interconnector.
- Full details of all new vehicular accesses.

#### **Key issues:**

The preservation of the listed buildings and their setting (S.66 P(LBCA) Act 1990; Policies DM29 of the Winchester District Local Plan Part 2 Adopted 2017; Policies CP19 & CP20 Winchester District Joint Core Strategy; NPPF Section 16.

The preservation or enhancement of the character or appearance of the conservation area (S.72 P(LBCA) Act 1990; Policies DM27 & DM28 of the Winchester District Local Plan Part 2 Adopted 2017; Policy CP19 & CP20 Winchester District Joint Core Strategy; NPPF Section 16.

### Comments and advice;

There are a number of designated heritage assets within the vicinity of the proposed interconnector. The vast majority of these are grade II listed dwellings located in open countryside locations, the setting of which would be impacted on to varying degrees by the proposed development. There are no grade II\* or grade I listed building that would be affected by proposals. The Hambledon Conservation area lies to the west of the interconnector site and has the potential to be affected by the proposed development.

#### Local and National Planning Policy and Advice;

It is considered that the submission has included all relevant National and Local Planning Policy and guidance. However the policy section of ES Vol. 1. Ch. 21 (Heritage and Archaeology) should make reference to the duty under S.66 of the P(LBCA) Act 1990 to have special regard to the desirability of preserving listed buildings and their settings. It is evident from the document that this duty has been considered in formulating proposals.





# Assessment Methodology;

The adopted methodology for assessing the impact of development on designated and non-designated heritage assets utilises established methodologies. The process and methodologies used is considered to be sound.

#### Key issues requiring clarification;

- There are a number of references within the submitted information which presume or imply that a number of buildings of different size scattered across the site would be more harmful than the current proposal (that is, one large / conjoined structure) by virtue of creating visual clutter. This is contested as it has not been demonstrated or evidenced that this would be the case. These statements imply that the use of a number of smaller buildings would be practical from an operational perspective. No details of the potential opportunities to reduce the height, and thereby the impact of the building, that this alternative approach may offer have been included in the submission. Given the potential this alternative approach may offer to significantly reduce the impact on landscape (on which I defer to my landscape colleagues) and on the setting of the listed buildings closest to the site, all opportunities to mitigate harm as far as possible should be investigated and evidenced. This evidence and justification is currently lacking and as such brings into question the need for a building of the size and height proposed.
- It is unclear why there is a need for the large volumes of open space above
  the equipment as depicted in the submitted cross sections. It is assumed that
  there are sound operational requirements for this space but this is not
  explained in the submission and therefore raises the questions as to whether
  there is scope to significantly reduce the height and scale of the buildings.
- Paragraph 3.2.1 discusses which alternative sites have been considered and discounted and justifies these. However, nowhere in the submission is there any discussion of alternative layouts which could potentially reduce the impact of the building by reducing its height. Much emphasis is made of operational constraints dictating built form but it is not explained what these constraints are. This lack of explanation and justification means that it has not been satisfactorily demonstrated that an alternative solution with a shorter building or buildings, which could have significantly less impact on the setting of heritage assets, could not be achieved.
- Paragraph 15.5.3.76 states that the Hambledon Conservation Area has not been included in the LVIA as it is considered that it would not experience potential views of the development. This statement needs to be justified and evidenced given the proximity of the Hambledon Conservation Area to the site and well within the ZTV. The impact on the setting of Catherington Conservation Area is assessed in ES Vol.1. Ch. 21 (Heritage and Archaeology) but the impact on Hambledon is not assessed. As above, justification as to why the impact on Hambledon has not been considered is lacking.



# Impact on the setting of Designated Heritage Assets:

The ES Vol.1 Ch. 21 (Heritage and Archaeology) concludes that the magnitude of impact on the setting of nearby listed buildings is small and that where minor adverse impacts would occur, such as to the setting of Scotland, the listed building which would be most affected, could be mitigated. These conclusions are not disputed, particularly taking into account the nationally significant benefits that would arise from the development which would outweigh the low level of harm to the setting of heritage assets, in accordance with paragraph 195 of the NPPF.

#### Minor error;

Paragraph 5.3.9.11 states that the Catherington Conservation Area lies to the west of the convertor station site; Catherington lies to the east and Hambledon to the west.

# Design/further details required;

The submitted elevations are all indicative and heavily caveated as such. There is therefore a need to control the final appearance of the converter station and its materials by condition. Similarly there are no details of the potential vehicular access, one of which would be in close proximity to the grade II listed barn at Shafter's Farm, and these would also need to be adequately controlled.

Historic Environment Officer 31/01/20

