

**Aquind Interconnector application for a Development Consent  
Order for the 'Aquind Interconnector' electricity line between Great  
Britain and France (PINS reference: EN020022)**

**Summary of Written Representations**

on behalf of

**Mr. Michael Jefferies and Mrs. Sandra Jefferies**

**Registration Identification Number: 20025044**

**Submitted in relation to Deadline 1 of the Examination Timetable**



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## **1 INTRODUCTION**

- 1.1 Mr Michael Jefferies and Mrs Sandra Jefferies (our "**Clients**") own the freehold interest in Hillcrest, Old Mill Lane, Denmead, PO8 0SN (the "**Land**"). They live on the Land and use it for commercial purposes. The Land is situated within the Converter Station Area (Works No.2).
- 1.2 The Promoter proposes to permanently compulsorily acquire 10,074 square metres of the Land (plot 1-23) and compulsorily acquire new permanent landscaping rights over 2,778 square metres (plot numbers 1-11, 1-13, 1-15, 1-16, 1-17, 1-19, and 1-24).

## **2 COMPULSORY PERMANENT ACQUISITION OF FREEHOLD INTEREST**

- 2.1 Most of plot 1-23 is occupied by part of a moto-cross circuit which is let. Should the freehold interest in plot 1-23 be compulsorily acquired this could lead to the loss of the circuit and loss of rental income.
- 2.2 There is no need for the Promoter to compulsorily acquire the freehold interest over the entirety of plot 1-23:
- 2.2.1 Under Option B(i) for the Converter Station, only part of the Station's footprint and embankment works is located on plot 1-23. Under option B(ii), none of the Station's footprint, nor embankment works will be located on plot 1-23. The Promoter however intends to permanently acquire the same area irrespective of which option is chosen;
- 2.2.2 Under Option B(i) some of the land will remain as "existing recreation area" and some is proposed as scrub. No reason is given as to why this needs to be permanently compulsorily acquired; and
- 2.2.3 Most of plot 1-23 is only to be landscaped. Landscaping rights would be more appropriate, as they would be supplemented by Articles 23, 30 and 32 of the draft DCO, the fact that landscaping management activities need only be carried out once or twice a year, and because the Outline Landscape and Biodiversity Strategy provides that local farmers would be responsible for implementing parts of the detailed landscaping strategy. .
- 2.3 It is requested that the compulsory acquisition power relating to plot 1-23 is subject to alternative options depending on whether Option B(i) or Option B(ii) is chosen, the plot is reduced so that it only covers the footprint of the Converter Station falling within plot 1-23 and that the Book of Reference and Land Plans be amended so that none of our Clients' freehold interest is subject to powers of permanent compulsory acquisition should Option B(ii) be selected.

## **3 COMPULSORY ACQUISITION OF NEW PERMANENT LANDSCAPING RIGHTS**

- 3.1 The parts of the Land over which permanent landscaping rights are proposed already consist of established hedgerows including species-rich, "Important Hedgerows."
- 3.2 The Promoter has failed to explain why it requires permanent landscaping rights over those parts of hedgerows HR05 and HR06 that run perpendicular to the Converter Station and offer no screening value (plots 1-15, 1-17, 1-19 and 1-24). Any such rights should be limited to short sections of hedgerow.
- 3.3 The proposed list of rights far exceed those that are needed for the anticipated management of these hedgerows.
- 3.4 There has been very little engagement by the Promoter to reach a voluntary arrangement to avoid the use of compulsory acquisition powers as a matter of last resort.

- 3.5 The Promoter has failed to demonstrate that the extent of the compulsory acquisition is necessary and proportionate, taking only what is required and has failed to demonstrate that all reasonable alternatives have been explored.

#### **4 LOSS OF AMENITY**

##### *Dust*

- 4.1 There is conflict between the dust risk levels in the OOCEMP and Chapter 23 of the Environmental Statement, which leads our Clients to question the accuracy and reliability of the Promoter's assessment. Our Clients are also concerned that the dust mitigation measures will be insufficient.

##### *Construction noise*

- 4.2 Situated 200m from the proposed Converter Station our Clients' house is a key sensitive receptor. An estimated 3-year construction period for the Converter Station cannot be categorised as "temporary" and will cause significant harm to their health and wellbeing. There is also no requirement for the community liaison element of the Onshore Outline Construction Environmental Management Plan ("**OOCEMP**") to take positive steps to deal with unacceptable noise levels. Further explanations are also needed as to how the Promoter will minimise noise impacts.

##### *Visual amenity*

- 4.3 Our Clients' house will directly overlook the Converter Station (especially under Option B (ii)). The proposed buffer landscaping behind their house will provide inadequate screening.

##### *Operational noise*

- 4.4 Noise from the Converter Station may be audible at the nearest residential receptors, resulting in adverse effects on psychological health, including anxiety and lowering quality of life. We fail to see how, in light of such negative effects, a conclusion can be reached that the adverse impacts will be negligible to minor.

##### *Artificial light*

- 4.5 Requirement 23 of Schedule 2 of the draft DCO allows external lighting during "exceptional circumstances", but there is no definition of these, leaving it reliant on the Promoter's subjective and unchecked view. There needs to be a requirement for the Promoter to submit an external lighting strategy to the relevant local planning authority.

#### **5 WILDLIFE AND CONSERVATION**

- 5.1 It is unclear to what extent the Environmental Statement considers the presence of existing wildlife and protected species and what account will be taken of them in order to avoid their harm.

- 5.2 The assessment also relies on re-planting and re-landscaping to enhance biodiversity and rebalance the loss of wildlife, but there is no timeline for the overall recovery or improvement of wildlife in the area.

#### **6 GENERAL POINTS**

- 6.1 The Promoter is asked to explain how it has factored in a well, water pipe and electricity cable located on the Land into its assessments and confirm whether these are privately owned assets, or owned by statutory undertakers.

6.2 There needs to be a Requirement for the Promoter to submit a decommissioning strategy, impact assessment, and programme to the relevant local authority.

**Blake Morgan LLP**

**6 October 2020**