

Date: 6 October 2020

**Application by Aquind Limited 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. Geoffrey Carpenter & Mr. Peter Carpenter**

**Registration Identification Number: 20025030**

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

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Ref: 584927-6

## **1 INTRODUCTION**

- 1.1 Mr. Geoffrey Carpenter & Mr. Peter Carpenter (our "**Clients**") own the freehold interest in Little Denmead Farm, Broadway Lane, Denmead, Waterlooville, PO8 0SL,
- 1.2 Little Denmead Farm is situated within the converter station area. The area covered by plot numbers 1-32, 1-38, 1-51, 1-57, 1-69, 1-70, 1-71, and 1-72 falls within our Clients' freehold interest.
- 1.3 Our Clients benefit from a right of way over plot numbers 1-60, 1-63, and 1-65. These plots are also covered by Footpath 4 and Footpath 16
- 1.4 The proposals will cause significant harm to our Clients' health, business, and way of life. Our Clients are not satisfied that these impacts have been adequately assessed, or that there are strong enough protections in the draft DCO and supporting documents to mitigate or avoid the harm that will be caused.
- 1.5 Our Clients also strongly object to the extensiveness of the compulsory acquisition powers being sought over their freehold interest and right of way. There are other less-intrusive powers available.

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

- 2.1 It is not necessary for the Promoter to seek to compulsory acquisition powers to acquire our Clients' freehold interest over the entirety of plot number 1-32. The majority of plot 1-32 is to be landscaped and used as an access road. Compulsory acquisition powers to create new landscaping rights and new access rights would be more appropriate. We request that the power to compulsorily acquire the freehold interest in plot 1-32 be reduced so that it only covers the footprint of the proposed converter station. We also request that the remainder of plot 1-32 that is to be landscaped be made subject to new permanent landscaping rights. The part of plot 1-32 where the new access road is proposed should instead be subject to new access rights. We also request any related amendments be made to the Book of Reference and the Land Plans.

## **3 TEMPORARY USE OF LAND**

- 3.1 Our Clients own the freehold interest to plots 1-57 and 1-71, which are subject to powers of temporary use. Plot 1-71 forms part of a track (also known as Footpath 16). The only way large and heavy agricultural vehicles and our Clients' horses can access our Client's land is via this section of the track. The construction and commissioning works relating to the converter station area is estimated to take place between 2021 and 2024. This, coupled with the effect of Article 30(3)(a), means that plot 1-71 (and the track) could be possessed and used by the Promoter for approximately 4 years. This means (together with the proposed stopping up of plot 1-71 – see below) our Clients' access to their homes and remainder of their freehold interest would be severely restricted and their business would suffer. The draft DCO does not appear to allow access to be granted to large vehicles or animals along the track within plot 1-71 during that time. We request amendments be made to allow for heavy vehicles and animals to continue to use this track in our Clients' case, and for practical

arrangements to be left to be agreed between the Promoter and our Clients. We also request that Requirement 22 be amended to oblige the Promoter to obtain an independent assessment to establish the baseline condition of the relevant land before temporary use commences.

#### **4 TEMPORARY STOPPING UP & ACCESS**

4.1 Footpath 16 (public right of way) is located on our client's land within plot 1-71. Footpath 4 is located plot 1-60, adjacent to plot 1-71. Our Clients have a private right of way over Footpath 4. Footpaths 16 and 4 form one continuous track that is used by our Clients, farm animals and large vehicles. The only way large vehicles and our Clients' horses can access our Client's land is via this track. Footpaths 16 and 4 will be temporarily stopped up for the duration of the construction and commissioning works relating to the converter station area. This will remove access by large vehicles and animals to our Clients' land and remaining business for a number of years. The protections in the draft DCO are not adequate in this regard.

#### **5 NOISE AND VIBRATION**

5.1 Our Clients are not satisfied that a proper assessment of their particular sensitivities (living and working very close to the converter station area) has been carried out. A number of shortcomings in the Promoter's assessments are identified. 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 sources of noise that are causing concern.

#### **6 DUST AND AIR POLLUTION**

6.1 There is conflict between the dust risk levels stated in the OOCEMP and in chapter 23 of the Environmental Statement, which throws doubt over the Promoters' assessment. We also question whether the proposed mitigation measures go far enough, for example there is no strict obligation to monitor air pollution, only a statement that the Promoter "may" carry out monitoring. Our Clients are also concerned about the effects of air pollution on Stoneacre Copse, which they will keep ownership of. The Environmental Statement states these impacts will be of "temporary" nature, but as the impacts will last for the duration of the construction (between 2021 and 2024), this is a significant period of time for our Clients.

#### **7 CONTAMINATION**

7.1 The Environmental Statement states that in relation to Stoneacre Copse, increases in pollutants such as dust and chemicals in waterborne run-off, could lead to "effects" during construction. These "effects" are not described. There is no obligation for the Promoter to remediate contamination caused by the works to land outside the Order Limits where the Environmental Statement already identifies a clear risk of contamination to named areas.

#### **8 ARTIFICIAL LIGHT**

8.1 Requirement 23 of the draft DCO allows external lighting during "exceptional circumstances", but there is no definition of "exceptional circumstances", leaving it to the discretion of the Promoter. There needs to be a requirement for the Promoter to submit an external lighting strategy for operational purposes to the relevant local planning authority.

## **9 HUMAN HEALTH**

- 9.1 Due to the concerns relating to air pollution, dust, light, noise and vibration, our Clients do not agree with the Promoter's assessment that there will be a negligible to minor impact on human health.

## **10 WILDLIFE & CONSERVATION**

- 10.1 There are a number of species of wildlife on our Clients' land, but it is unclear to what extent the Environmental Statement considers their presence. The assessment also relies on re-planting and re-landscaping to enhance biodiversity and to rebalance the loss of wildlife, but there is no assessment in terms of how long this could take, and the impact of this on the effectiveness of the proposed mitigation measures.

## **11 DECOMMISSIONING**

- 11.1 There should be a requirement for the Promoter to submit a decommissioning strategy, impact assessment, and programme to the relevant local authority before any decommissioning takes place.