

20 October 2020

The Examining Authority Case Team
Aquind Interconnector Project
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

By email only

Dear Sir / Madam

**DCO Application for the Aquind Interconnector Project
SDNPA Deadline 2 Submission**

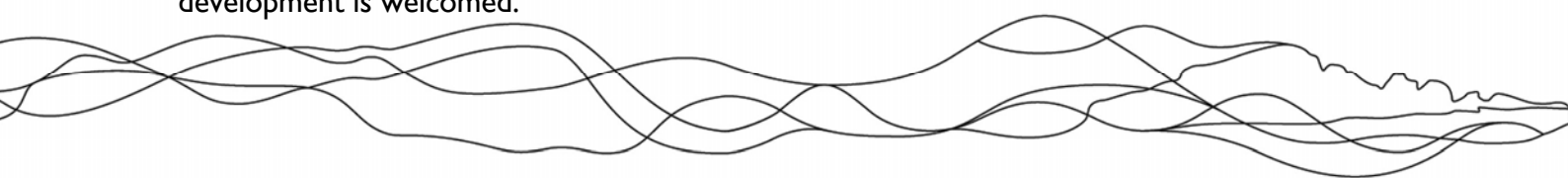
I write to provide this Authority's response to the following documents provided at Deadline 1:

1. The applicant's *Draft Development Consent Order*
2. The applicant's *Environmental Statement Addendum: Appendix 3, Supplementary Alternatives*
3. National Grid's *Response to Written Questions ExQ1*
4. The applicant's *Position Statement on Planning Obligations in connection with the Proposed Development*

SDNPA Comments on the draft Development Consent Order submitted at Deadline 1 (reference REPI-022)

The Authority made comprehensive representations on the draft Development Consent Order in its Deadline 1 submissions and these comments still apply. Following submission of the amended draft Development Consent Order at deadline 1 the Authority makes the following supplementary comments:

1. Part 3, Article 10 (4), page 13: The revised time period of 20 working days is considered too tight to discharge this requirement and, for the reasons given in our Deadline 1 submissions, should be extended to 40 working days. 20 working days is particularly insufficient where the street authority may wish to consult others, including where appropriate the South Downs National Park Authority (SDNPA).
2. Proposed DCO Requirement 14, page 51: The text addition to make clear that this external construction lighting should be removed prior to the operation of the development is welcomed.



SDNPA Comments on the Environmental Statement Addendum, Supplementary Alternatives (reference REPI-152)

The provision of this additional information by the applicant at Deadline 1 is welcomed. It is acknowledged, based on the explanation and justification given in this document, that there is a logical and reasonable rationale for selecting Lovedean as a grid connection point above that of the alternatives at Chickerell and Bramley. However, that being said, the Authority has two further points to make:

1. In chapter 5 a comprehensive account is given of why a grid connection at Chickerill and Bramley were discounted. However, preceding this, the reasoning for not progressing with 7 other substation locations, some of which are not near protected landscapes, is cursory (paragraph 5.1.1.5). It is appreciated that providing a comprehensive assessment as the applicant has done for grid connections at Chickerill and Bramley would be disproportionate but more information as to why these sites were discounted beyond the existing sentence given for each of the 7 discounted sites should be provided.
2. With reference to the influence that the proximity of the South Downs National Park had, or did not have, on the location of the grid connection paragraph 2.1.1.10 makes it clear that the applicant is not in a position 'to confirm all that National Grid did or did not take into account' on this matter. It is not therefore possible to determine whether National Grid had regard to the purposes of the National Park, as required by Section 62 of the Environment Act, 1995. We can therefore have no assurance that this took place and what, if any, consideration was made of this matter in decision making by National Grid. We therefore ask that the Examining Authority issue a further written question to the National Grid on this matter (see our comments immediately below).

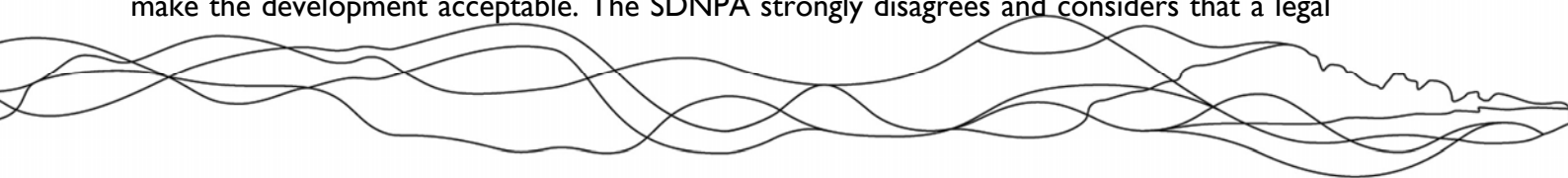
SDNPA Comments on National Grid's Response to Written Questions ExQ1 (reference REPI-214)

The Authority notes National Grid Electricity Transmission Plc's (NGET) answer in respect of question EIA1.6.2. In essence they consider that the question needs to be put to National Grid Electricity System Operator Ltd (NGESO). Whilst this clarification is useful it is disappointing that the Examining Authority's question was not passed on by NGET, nor has a contact point been provided at NGESO.

The SDNPA have, to date, been unable to make any progress on this matter with National Grid therefore we request that the Examining Authority's question be put again, this time to NGESO. In the meantime the SDNPA will also attempt to discuss the matter with this organisation.

SDNPA Response to the Position Statement on Planning Obligations in connection with the Proposed Development (reference REPI-135)

The applicant's position is that a Section 106 legal agreement is not required in order to make the development acceptable. The SDNPA strongly disagrees and considers that a legal

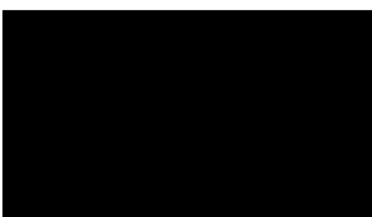


agreement is required in this case to ameliorate the harm caused by the development to landscape character and the setting of the National Park, particularly by virtue of the large scale of the convertor station buildings and their proximity to the National Park boundary on three sides. This harm remains despite the landscaping scheme put forward by the applicant as mitigation.

The SDNPA's position on this matter is supported by paragraph 5.9.9 of the Overarching National Policy Statement for Energy which states that National Parks have the highest status of protection in relation to landscape and scenic beauty. Paragraph 5.9.12 states that the duty to have regard to the statutory purposes of National Parks also applies to projects outside the boundaries of National Parks where they may have impacts within the National Park. The aim, it goes on to note, should be to avoid compromising the purposes of a protected landscape's designation and projects should be designed sensitively given the various siting, operational and other relevant constraints. Such an approach is also consistent with Policy SD42 of the South Downs Local Plan that applies to infrastructure and states that development proposals will only be permitted where appropriate, necessary and reasonable infrastructure investment has either been secured either in the form of suitable on-site or off-site works and/or financial contributions to mitigate the impact.

The fact that the development as it stands will cause harm to the National Park is incontrovertible, the applicant's Planning Statement for example accepts there will be significant adverse landscape and visual amenity effects. To offset this harm the SDNPA will be discussing with the applicant a planning obligation to cover landscape enhancement works off site (but within an appropriate distance) within the National Park. The nature of the possible works is to be discussed with the applicant but could include undergrounding of overhead power lines in the National Park, grassland enhancements and/or improvement works to hedgerows, trees and woodlands (including ancient woodland). These works could be undertaken by the applicant itself (to an agreed specification) or through a financial contribution in lieu.

Yours faithfully



Mike Hughes
Major Planning Projects & Performance Manager
Email: mike.hughes@southdowns.gov.uk
Tel: 01730 819325

South Downs Centre, North Street,
Midhurst, West Sussex, GU29 9DH

T: 01730 814810
E: info@southdowns.gov.uk
www.southdowns.gov.uk

Chief Executive: Trevor Beattie

