

15 February 2021

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

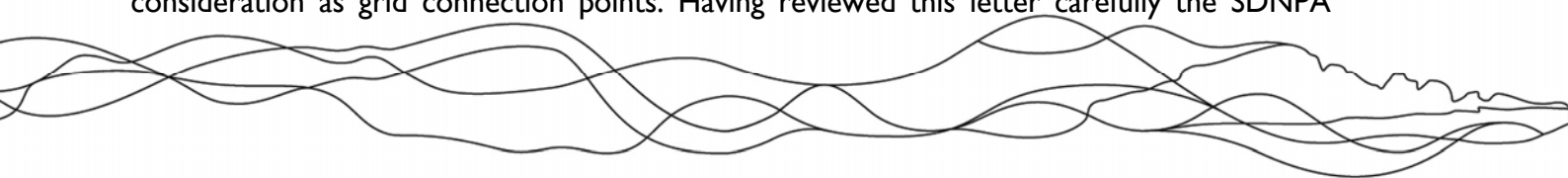
**DCO Application for the Aquind Interconnector Project  
SDNPA Deadline 7c Submission**

I write to provide the following from the South Downs National Park Authority (SDNPA) at Deadline 7c:

1. SDNPA comments on a letter from National Grid Electricity Systems Operator Limited (examination library reference REP7-109)
2. SDNPA comments on 'Applicant's Responses to Deadline 6 and 6a Submissions – Additional Submissions' (REP7-076)
3. SDNPA comments on the Outline Landscape and Biodiversity Strategy (REP7-023)
4. SDNPA comments on the Environmental Statement Addendum 2 (REP7-067)
5. SDNPA comments on 'Additional Viewpoint Location Plan and Additional Viewpoints,' Parts A and B (REP7-062 and REP7-063)
6. SDNPA comments on the Design and Access Statement (REP7-021)
7. SDNPA comments on the Day Lane Technical Note (REP7-046a)

SDNPA comments on a letter from National Grid Electricity Systems Operator Limited (examination library reference REP7-109, dated 25 January 2021)

National Grid's letter is in response to a written question from the Examining Authority, reference EIA2.6.1, relating to 7 existing substations and why these were discounted from consideration as grid connection points. Having reviewed this letter carefully the SDNPA



remain somewhat unclear, despite wishing to draw this matter to a close, as to why these 7 locations were discounted at an early stage.

The SDNPA notes that the agenda for Issue Specific Hearing 4 (reference EV-016) has questions, at agenda point 22.2, on this matter. We also note that National Grid has been invited to attend this hearing and the SDNPA wishes to engage on this matter. Therefore it is hoped that at the hearing this matter can be finally resolved.

#### SDNPA comments on 'Applicant's Responses to Deadline 6 and 6a Submissions – Additional Submissions' (REP7-076).

In the bottom row of table 4.14 on page 4-32 it is not accurate to state that the SDNPA has accepted that there was a logical and reasonable rationale for selecting Lovedean as the grid connection point. Rather, the SDNPA consider, as we set out in our deadline 2 response, that there was a logical and reasonable rationale for selecting Lovedean as a grid connection point *above that of the alternatives* at Chickerell and Bramley. However as we make clear in the very same deadline 2 response (and since) the applicant's stated reasoning for not progressing with the other 7 substation locations is, in our view, limited.

#### SDNPA comments on the Outline Landscape and Biodiversity Strategy (REP7-023)

1. This latest version of the Outline Landscape and Biodiversity Strategy has removed reference to the previously proposed 10m strip of planting to the south of Mill Copse. This was previously indicated on the applicant's Landscape Mitigation plans, however the latest revision at deadline 7 has removed this.

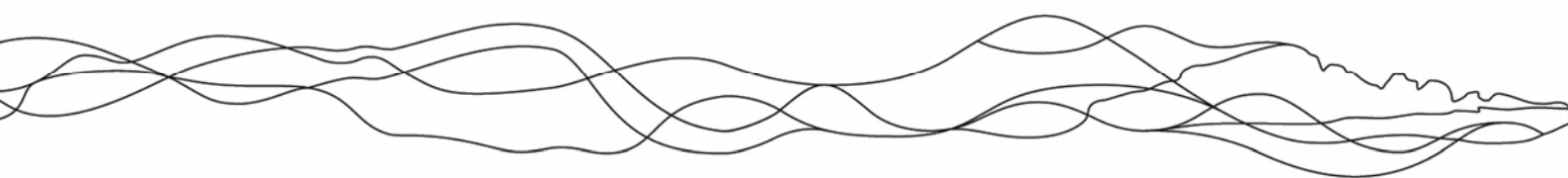
This screening was identified as important by the applicant previously (Change Request Reference AS-054) in response to ash die back. The SDNPA would question the extent to which this reduces the effectiveness of the additional visual mitigation identified to be required in relation to ash die-back disease.

2. The SDNPA note that replacement planting proposed by the applicant within the existing woodlands, hedgerows and for individual trees is not indicated on the Landscape Mitigation Plans.

#### SDNPA comments on the Environmental Statement Addendum 2 (REP7-067)

1. There is no reference made to the impacts of the changes recently made to the entrance / haul road off Days Lane and the proposed laybys on Day Lane. Such commentary on impacts has been provided in respect of the separate Prew's Hanger view. Whilst the focus is understandably on the large Converter Station buildings, the changes to the site entrance are also important, especially as Days Lane adjoins the boundary with the South Downs National Park.

As Page 14-80 notes (paragraph 14.1.3.3) the revised strategy for the management of HGVs requires an update to the Predicted Impacts along Day Lane during the



Construction Stage as reported in the ES Addendum. The same should apply, in our view, to the landscape impacts of the changes at Days Lane.

2. In the Assessment of Visual Effects section (page 12-72 onwards) there are references to specific woodlands (PW-5 for example) but there is no plan in either this document, the Outline Landscape and Biodiversity Strategy nor the Landscape Mitigation Plans that shows which areas of woodland have which reference.

#### SDNPA comments on Additional Viewpoint Location Plan and Additional Viewpoints Parts A and B (REP7-062 and REP7-063)

The SDNPA welcome the additional viewpoints provided; viewpoint 1a and 1b from the south of Scotland Farm; 2 from Prew's Hanger; and 3a, 3b and 3c in the vicinity of the Haul Road layby opposite the site entrance and the site entrance itself. The Applicant has now provided wireframe images for 1a, 1b and 2, as well as assessing the likely effects and impacts on visual amenity. The applicant's assessment of the likely effects and impacts for viewpoints 1a, 1b and 2 is accepted by the SDNPA.

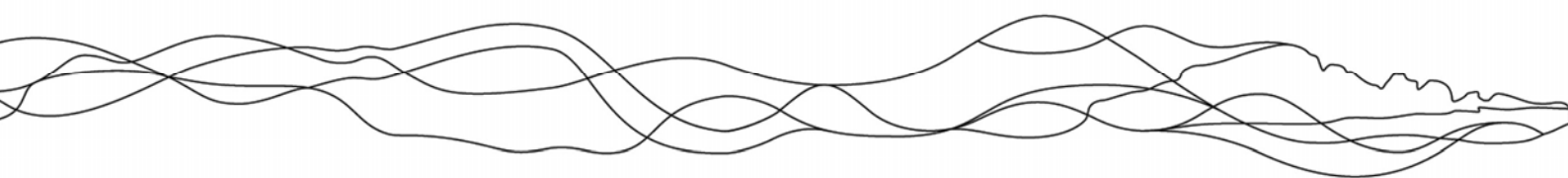
The SDNPA asks why similar assessment work (i.e. the likely effects and impacts on visual amenity) has not been carried out for the additional viewpoints 3a, 3b, and 3c. As it stands there is no assessment for visual effects at the site entrance and the haul road layby area.

#### SDNPA comments on the Design and Access Statement (REP7-021)

1. In relation to paragraph 4.3.9.6, a separate call with SDNPA was undertaken on 4 December 2020 as the SDNPA's Landscape Consultant couldn't attend the earlier call with wider LPA attendance. In this paragraph under 'Comment' the SDNPA's view is more accurately reflected as the following (text additions in red for ease of reference):

*Comment: (SDNPA) felt the range of agreed colours set out in the latest revision of the 'Contextual Elevation Study' (dated 27.11.20) was not sufficiently broad enough to be able to be used to mitigate the proposals. Whilst accepting that the lower levels of the building do need the darker, more recessive appearance SDNPA requested that a wider colour range be adopted to ensure flexibility in choosing a suitable colour treatment where the built form is set against the sky, incorporating the paler colours, if deemed to be appropriate, identified in the previous iteration (24.11.20).*

2. Page 18 notes that the decision whether to select Option B i) or B (ii) for the Convertor Station will be finalised following the grant of the Development Consent Order. SDNPA has stated previously that Option B (ii) is, without prejudice, our preferred option given its lower impact on existing vegetation and as it has slightly lower adverse impact in most views. Now that we are several months into the examination, it would be helpful if the applicant could confirm which Convertor Station option is to be selected.



3. Page 75 makes no reference of woodland planting for Ash dieback – it only references hedgerows. We suggest that this be updated.
4. With reference to page 80 it is recommended that, in light of recent evidence, ash dieback planting within woodlands and hedgerows be included as a new design principle.

Other than this, and without prejudice to our view that the landscape mitigation plans put forward by the applicant are inadequate, the SDNPA is content with the wording of the Design Principles for the Converter Station.

#### SDNPA comments on the Day Lane Technical Note (REP7-046a)

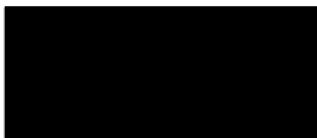
Road laybys are proposed which we understand lie within the highway boundary (and thus outside of the National Park). With reference to this change the Day Lane Technical Note makes no comment in respect of arboricultural or biodiversity matters, nor does it make any reference to impact on views.

In respect of views Monarch's Way runs across fields to the immediate north. Lorry movements during construction will have an adverse impact on views. It is accepted that the laybys themselves will not cause harm to views, however the laybys do represent a moderate erosion of the rural character of this lane. Will the applicant remove the laybys once they are no longer required?

From a desktop study we would note the following in respect of arboricultural matters and the laybys proposed:

- Layby a: grass area only – no concerns in respect of trees
- Layby b: tree RPAs may be affected – is there an arboricultural survey?
- Layby c: narrow verge. Hedge RPA may be affected, unless there is a ditch. If there is a ditch then is this affected?
- Layby d: narrow verge. Tree and hedge RPAs may be affected – is there an arboricultural survey, unless there is a ditch. If there is a ditch then is this affected?

Yours faithfully



Mike Hughes  
Major Planning Projects & Performance Manager  
Email: [mike.hughes@southdowns.gov.uk](mailto: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](mailto:info@southdowns.gov.uk)  
[www.southdowns.gov.uk](http://www.southdowns.gov.uk)

Chief Executive: Trevor Beattie

