



The countryside charity
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**The Planning Act 2008, Section 89, and The Infrastructure Planning (Examination Procedure) Rules
2010, Rules 8, 9 & 13**

**Application by AQUIND Limited for an Order Granting Development Consent for the AQUIND
Interconnector Project**

Response to Deadline 7 Submissions on behalf of

CPRE HAMPSHIRE

(Reference 20024996)

This Response supplements the Written Representation of CPRE Hampshire, the countryside charity, **(the CPREH Representation)** and needs to be read together with it.

CPRE Hampshire has studied the documents submitted at Deadline 7 so far as relevant to the submissions in the CPREH Representation, which relate to the following matters:

- landscape character, visual amenity and tranquillity of the converter halls
- landscape impact of cable circuits
- cumulative impacts
- noise and vibration assessment, and
- consideration of alternative sites

and considers it may be helpful as the Examination draws to a close to set out our position on these matters in light of the further evidence provided during the Examination process.

In particular, as covering the above matters, we have studied the Design and Access Statement Revision 004 [REP7-021], Outline Landscape and Biodiversity Strategy Revision 005 [REP7-023], with accompanying Plans [REP7-025 & 026], Applicant's Response to Examining Authority's Further Written Questions (ExQ2) [REP7-038], Statement of Commonality for Statements of Common Ground [REP7-048], Statement of Common Ground with Winchester City Council [REP7-049], Statement of Common Ground with South Downs National Park Authority (**SDNPA**) [REP7-051], Additional Viewpoint Location Plan and Additional Viewpoints Part B [REP7-063], Environmental Statement Addendum 2 [REP7-067], East Hampshire District Council Deadline 7 Submission [REP7-082], SDNPA Deadline 7 Submission [REP7-089], Winchester City Council Deadline 7 Submissions [REP7-091 to 102], National Grid Electricity Systems Operator Limited Deadline 7 Submission [REP7-109]

Planning Considerations

It is noted from the Statement of Common Ground with the SDNPA that it is agreed with the Applicant that Local Plan policies from the relevant authorities are "important and relevant" considerations for the Secretary of State in determining this Application. Relevant local plan policies are referred to in the CPREH Representation.



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Landscape Character, Visual Amenity and Tranquillity of the Converter Halls

As regards landscaping and landscape mitigation, should a Development Consent Order (DCO) be granted, CPRE Hampshire agrees with the principles in section 5.7.1 and 5.7.3 of the Design and Access Statement Revision 004 [REP7-021] (the DAS), as set out in more detail in the Outline Landscape and Biodiversity Strategy Revision 005 [REP7-023]. It is critical that the Applicant is committed within the terms of the DCO to adhere to these principles and details in the detailed design stage.

As regards exact location of the converter halls, should a DCO be granted, CPREH strongly supports Option B(ii), which would assist landscape mitigation by retention of an important north south hedgerow with trees.

However, of particular concern, is the advent of ash dieback which it is agreed would reduce the mitigating effect of existing vegetation on the Significant Adverse Effects of the converter halls on landscape character and visual amenity as time goes on. So, we strongly support the bringing of Mills Copse and Stoneham Copse within Order Limits so that they can be managed to limit the impact of ash dieback. However, where consisting of ancient woodland management would be needed to maintain and enhance habitat value. Use of a Deed of Grant of Easement is considered appropriate to secure management of landscape features which contribute to screening of the converter halls but are not owned by the Applicant.

Nevertheless, the change to the future baseline which results from ash dieback only reinforces our concern expressed in the CPRE Representation as to the limited extent to which maturity of the mitigation planting after 20 years would reduce the Significant Adverse Effects of the converter halls on landscape character and visual amenity. Significant increased effects at Year 0 and Year 10 on some recreational users following ash dieback, including the Monarch's Way, are acknowledged by the Applicant. So, CPRE Hampshire continues to maintain that the landscape and visual effects of the converter halls need to be judged solely on the assessment at Year 0, as ash dieback would likely reduce the screening effect of planting for much of their 40 year life.

We support the Building Design Principles set out in the DAS section 6.2.2, should a DCO be granted. In particular, we fully agree that the converter halls should be based on a recessive (and not a 'celebratory') design, and that the roof of each building should be a dark recessive non reflective colour to minimise visual impact. Also that the cladding should be of a design which is comprised of elements and colours to break up the mass of the buildings and their visual prominence.

We are therefore sympathetic to the focus of the colour palette being on darker colours, but agree with the SDNPA that it does need to include a broader range of colours to provide a degree of flexibility when undertaking the contextual study which would take place at the detailed design stage; and that this should include some lighter colours for use if required, notably where the buildings cut the skyline. It is crucial to achieving the best possible integration of the converter halls into the landscape that the contextual study would test each elevation from different viewpoints and angles to determine the best choice of colours and colour ratio from the agreed palette, and to determine the degree of transition from darker to lighter colours where appropriate.



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We agree that it is important that impacts on landscape and visual amenity are not exacerbated by plant on the roof of the buildings; and it is critical to maintaining dark skies within and without the South Downs National Park (**SDNP**) that the converter station should not be illuminated other than in exceptional circumstances, and that the lighting scheme is developed in accordance with the SDNPA Technical Advice Note 2018, Dark Skies.

In relation to all these matters of detailed design and landscaping it is vital that the DCO specifies that the relevant discharging authority should act in consultation with the SDNPA.

We understand that there is potential for the height of the converter halls to be limited to 22m, and that 26m is the worst case scenario. CPRE Hampshire would support the DCO stipulating the lowest height achievable in order to limit impact on the landscape, if a DCO should be granted. The Applicant responds by stating that this would limit the choice of contractors to build the converter station but such a limitation appears entirely reasonable in the context of the selection by the Applicant of a site with a nationally designated landscape on three sides.

Due to Covid restrictions, we have not had an opportunity to see for ourselves the view towards the converter station from new Viewpoint 2, a footpath at Prew's Hanger within the SDNP, but note that the effect on visual amenity of the converter halls is assessed by the Applicant as Significant at Year 0 and Year 10, taking account of anticipated ash dieback. This footpath is an interconnecting route which is valued and well used by the public. This Significant Adverse Effect would be additional to those identified in the Environmental Statement.

Tranquillity

We understand that there remains disagreement between SDNPA and the Applicant as to the interpretation of "tranquillity" in the context of the impact of the Proposed Development on the SDNP and its setting. Tranquillity is a concept developed by CPRE and is much wider than just noise. It is a state of calm and quietude associated with a feeling of peace; a perceptual quality of the landscape influenced by things that people can both see and hear in the landscape around them. This would include the sight of the buildings and other structures within the converter station, and audible noise. Tranquillity in this wider sense is a Special Quality of the SDNP which requires protection, as set out in Strategic Policy SD7 (Relative Tranquillity) of the SDNP Local Plan, whether the development is within the SDNP or within its setting. It is this wider concept of tranquillity that must be considered by the Secretary of State, and it is clear that the converter halls would have a significant adverse effect on such tranquillity of users of rights of way within the SDNP, notably the Monarchs Way.

Landscape impact of cable circuits

Our concerns, should a DCO be granted, as set out in the CPREH Representation as regards impacts on the landscape of installation of the cable circuits along the Hambledon Road and then north to the converter station, have been the subject of detailed discussion between the Applicant and Winchester City Council with the results, so far, as set out in Outline Landscape and Biodiversity Strategy Revision 005 [REP7-023]. CPRE Hampshire fully supports this ongoing work.



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Cumulative Impacts

CPRE Hampshire has nothing to add to its submission set out in the CPREH Representation.

Noise and Vibration Assessment

It is of concern, particularly in the absence of compliance with NPS EN-1 in relation to noise assessment as set out in the CPREH Representation, that the Applicant seeks to exclude liability for statutory nuisance by way of Article 9 of the DCO.

Consideration of alternative sites

In the CPREH Representation we noted the lack of information provided in the Environmental Statement as to the rejection of alternative sites considered in the optioneering process, with the consequent selection of the Lovedean site within the setting of the SDNPA. We understand the reasons given by the Applicant for excluding the Chickerell and Bramley sub-stations, but the reasons for not taking the seven other substations to the shortlist not been provided by the Applicant. This is a serious omission. These sites include the spacious, grid-connected, ex-power station site at Fawley, as discussed in the CPREH Representation.

Further, the Examining Authority has asked a specific question as to if and how National Grid Electricity Systems Operator Limited (**NGESO**) took into account the potential effect of the choice of the Lovedean substation on the statutory purposes for which the SDNP was designated, as required by S62 Environment Act 1995. Although given ample time to review the matter, NGESO in its response has conspicuously failed to answer that specific question, leading inevitably to the conclusion that S62 of the Environment Act was not properly considered when the choice of Lovedean was made.

These concerns as to consideration of alternative sites are reflected in the outstanding matters in the Statements of Common Ground with the SDNPA and Winchester City Council, and their respective Submissions at Deadline 7.

Conclusion

While supporting the landscape, landscape and design principles as set out above, CPRE Hampshire continues to maintain that these would not mitigate the Significant Adverse Effects of the converter halls on landscape character, visual amenity and tranquillity within and without the SDNP, as set out in the CPREH Representation. Accordingly, CPRE Hampshire continues to consider that development of the converter halls:

- (a) would not further national park purposes, contrary to NPS EN-1 para 5.9.12, and would not comply with the strategic planning principles set out in the SDNP Local Plan, and**
- (b) would not provide such benefit as to offset the damage that would be caused to the landscape, visual amenity and tranquillity outside the SDNP, contrary to NPS EN-1 para 5.9.15, and would not comply with the core planning principles of the Winchester District Local Plan Part 1**

Further, the Examining Authority will need to consider in the planning balance as between the benefit of siting the Converter Halls at Lovedean and the consequent Significant Adverse Effects on



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the nationally designated landscape which is the SDNP, the lack of justification for rejecting alternative sites in a more industrial location and for selecting a site within the setting of the SDNP without properly considering the potential effects on the statutory purposes of the national park, contrary to S62 Environment Act 1995.

CPRE Hampshire South Downs & Central Planning Group