

From: [Cllr Langford-Smith](#)
To: [Aquind Interconnector](#)
Subject: Submission from Denmead Parish Council before deadline 8
Date: 01 March 2021 10:29:50

Please see below the comments from Denmead Parish Council which we respectfully ask you to consider:

- The lack of commitment to restore the Kings Pond meadow area after removing the compound

The concern relates to the impact on a section of the Kings Pond Meadow SINC. The proposal would see a roadway and cable circuits crossing Field 8 East. (See Appendix 4 Figure

Denmead Meadows SINC REP7-071) This field is part of the SINC. The roadway links the Anmore Road access (AC/2/a) as shown on sheet 3 of the Access and Rights of Way Plans

(REP7-008) through to the proposed HDD5 recovery compound in Field 13.

The outstanding issue concerns the applicants intentions regarding the restoration of the land after the temporary use ceases.

The proposal is to monitor the land in years 1, 3 & 5. Recent indications are that apart of the land will be fenced off for the first winter. Whilst the applicant will undoubtedly have some

form of contract with the landowner to cover the construction period, there is no proposal to extend that arrangement or indeed any type of arrangement that would influence the management

of the land during the restoration period beyond the monitoring and simple management visits. This means outside the maintenance visit which will occur on three occasions over a period

of 5 years, the landowner will be at liberty to use the land as they see fit with the potential that those action may run directly counter to the restoration measures. The dDCO powers would cover such an agreement if the parties were willing to enter into one. This is not to imply there has to be ownership of the land but some form of understanding over the way the land is farmed. Without an adequate level of influence or control over the use of the land during the restoration period there must be an uncertainty if the land will be brought back to its former condition.

- The dismissal of extending the haul road to access Anmore Road. The care home is sited on a road already so a temporary second road would be acceptable and is far preferable than

using Mill Road which contains a large number of residences

The construction traffic route for accessing works within Kings Pond Meadow is identified within Section 3.4.4 of the Framework Construction Traffic Management Plan (REP6-032). HGV construction traffic to/from Anmore Road and Kings Pond will be routed either via the Converter Station Area and A3 London Road, B2150 Hambledon Road and Mill Lane or directly from junction 3 A3(M), Hulbert Road, A3 London Road, B2150 Hambledon Road and Mill Road.

No construction traffic will use routes along Broadway Lane south of the Converter Station Area or Soake Road. This will be managed and enforced by provision of route planning information by the contractor.

In the assessment of the traffic route options the Council asks why the option of coming

straight down the haul route has not been considered. This haul road will be formed alongside the cable circuits from Lovedean as far south as Anmore Road. The haul road could be extended, crossing Anmore Road and leading directly into the Kings Pond Meadow (KPM) site. This would avoid the need for any HGV traffic to enter the highway. Whilst the Order Limits do narrow as they run through the gap between the residential properties on the north side of Anmore Road, there does appear to be sufficient width to form a temporary roadway. If there is a concern over the available width, then attention to the sequence that the work is undertaken at KMP and in the fields to the north may resolve the issue. The proximity of the haul route to the children's home is not considered so critical an issue when the number of vehicles concerned is taken into account. The Council notes the assessment of Mill Road in terms of traffic numbers. When it is considered that this road is residential in nature with no obvious destination point to the north, the figures presented of a weekday average of 69 HGVs in Appendix C Construction Vehicle Management on Anmore Road and Mill Road (REP7-075) is strongly questioned. The Council asks that the applicant check this figure. There does not appear to have been any assessment of the displaced car parking demand and how this would be satisfied within the surrounding area.

- The micro siting of the converter station which we would prefer option B(ii) where the trees/hedgerow would be retained

This is the last opportunity for the Council to comment on this matter. Despite the preference by the applicant for option B(ii) and the indications that the negotiations with National Grid would be completed by this time, there is no indication that they are. Accordingly, the Council must respond on the basis of both options going forward into the recommendation and decision making stage of the process.

The Council has maintained a view throughout the Examination that option B(ii) should be the only scheme to go forward. Now that option B(i) is still under consideration, then the Council feels that it should strengthen that view from severe concern to formally objecting to option B(i) as that option is considered contrary to the intentions of the local planning policies as set out in the consideration of this issue in section 4.6.9 of the Council's Local Impact Report (REP1-183). The planning policy context, commentary and conclusion from that section are copied below:

Planning Policy Context

Local plan part 1

Policy DS1 (Development Strategy and Principles) Notes the presumption in favour of sustainable development and that development should demonstrate conformity with a series of principles including maintaining and enhancing the importance of environmental heritage and landscape assets.

MTRA4 (Development in the Countryside) After listing certain types of development that could be permitted in the open countryside notes that development should not cause harm to character and landscape.

CP13 (High Quality Design) The core principle of this policy seeks the highest standard of design and seeks all development to demonstrate they have considered 5 criteria, one of which is that the development enhances the natural environment and improves local biodiversity

CP16 (Biodiversity) seeks to maintain, protect and enhance biodiversity,

delivering net gain across the district. It states that where unavoidable impacts occur, they should be appropriately mitigated. Proposals should clearly outweigh the harm to habitat and/or species.

Local Plan Part 2

DM15 (Local Distinctiveness) promotes the conservation or enhancement of trees and hedgerows that contribute to local distinctiveness.

DM17 (Site Development Principles) supports development that does not have unacceptable effects on amongst other criteria, ecosystems or landscape character.

DM23 (Rural Character) requires that development within the countryside should not have any unacceptable impact on the rural character of the area.

Commentary

During the PEIR consultation exercise the applicant put toward what is now referred to as option B(i) for the siting of the Converter Station. Responding to concerns raised by the Council relating to the loss of the significant section of hedgerow this option required, the applicant has brought forward what is now referred to as option B(ii). This would see the general position of the Converter Station moved some 35m eastward closer to the existing substation. This adjustment to the siting of the Converter Station would enable the retention of the hedgerow. It is understood that this move does require a successful negotiation with the National Grid.

If option B(i) is approved and construction, it would have a number of negative consequences from both a landscape and biodiversity aspect. The following hedgerows would be affected:

- *The lower half of hedgerow HR05*
- *All of HR08*
- *The eastern part of HR06*

This adds up to approximately 410m of species rich hedgerow and 25m of hedgerow will be lost (16.6.1.13). This includes some mature trees. This will also result in the loss of its biodiversity value including the loss of habitat for bats (section 16.6.1.27). It has also been recognised that two badger setts will also be destroyed (section 16.6.1.21). This action would weaken the landscape screen on the western side of the development removing the existing mature screen. This will be replaced by new planting as shown on Figure 6.10.1 Outline Landscape and Biodiversity Strategy Management Plan (APP-506). The new planting will obviously take time to mature into a condition that would provide the equivalent screening value and ecological value that the existing feature does.

If micro siting option B(ii) is adopted all the above negative aspects would be removed with only the east west hedgerow HR07 being removed.

Conclusion

The Council favours option (B(ii) as having the least impacts on natural features and habitat. Given the magnitude of the impacts associated with the implementation of option B(i) the Council would have severe concerns based on the landscape and biodiversity impacts as set out above. It is hoped the negotiations with the Grid can be successfully concluded.

The retention of option B(i) means that if this option were chosen it would be in conflict with the above policies. The logical expression of this view is to object to dDCO requirement 4 as proposed at deadline 7 which would allow the applicant to the choice of identify the micro siting option that will be built.

The ExA is requested that in the event they present a positive recommendation to the

Secretary of State that it excludes micro siting option B(i). This view is reflected in the Councils final comments on the dDCO which form part of this submission.

- Lack of any legacy benefit to the village of Denmead. Whilst other areas will be affected during the construction phase, Denmead will have this enormous building overlooking our village

for the next forty years and we believe that the village should have some benefit for this.

At D7 the applicant responded to ExAQ2 SE2.15.2. (REP7-038) This question sought an explanation for the predicted socio economic benefits to the rural settlements of Denmead and Anmore. The response did acknowledge the difficulty in setting out precise tangible benefits and talked of three areas, employment. Spending and support for community services. The applicant did generalise in identifying a number of local residents employed in construction and speculated that they could find work associated with the scheme. This attempted link is considered tenuous and lacks any depth of analysis of whether those people are working for the type of contractor who may tender for work on site. The degree of benefit from spending arising from purchases at local shops or from accommodation stays is also speculative. As the applicant intends to encourage contractors to use preferred routes to and from the site and these do not go through the village then the benefits from passing traffic will be limited.

The commitment to an Employment and Skills Plan is welcomed.

The applicants rejection of contributing to a more general community fund that would see the local area benefit from the scheme is regrettable. Citing the specific regulations is not viewed as adopting the same spirit as the Community Benefits Funds arising from Wind generation development. The difference in attitude between Aquind and the developer of IFA2 where community benefits have been proposed is noted. Even at this late stage, and if necessary secured outside the Examination process, the Parish Council would welcome some engagement with the applicant to establish such a fund.

Yours sincerely

Paula Langford-Smith
Chairman
Denmead Parish Council