Nationally Significant Infrastructure Project (NSIP) Representation for Aquind Interconnector

This Representation summarises the position of CPRE Hampshire and was sent to the Planning Inspectorate on 29 January 2020. CPRE Hampshire has registered as an Interested Party.

We consider that specific and relevant policies clearly indicate that a Development Consent Order should be refused for the reasons set out below, which are based on observations of the site and surrounding landscape by our local planning team.

The proposed development is surrounded on three sides by the South Downs National Park (SDNP) and in places is only 200-300metres from the boundary of the national park. It would have impacts on the national park. Accordingly the duty to have regard to the purposes of the SDNP applies to this project, per ONPSE-EN1 paragraph 5.9.12 and S62 of the Environment Act 1995. It is unclear how this duty has been met.

The proposed Convertor Station includes two convertor halls, each measuring 90 metres in length, 50 metres in width and notably 22-26 metres in height. These are very large buildings, with a height well in excess of even the largest agricultural buildings and mature trees. Given the high sensitivity and high value of the landscape of the SDNP, buildings of this scale, utilitarian appearance and form sited in this location could not but cause significant harm to the setting of the SDNP in relation to landscape character and visual amenity. The ability of this landscape to absorb change cannot apply to buildings of this scale, which would not be mitigated by being seen against an urban or industrial background

When viewed from elevated positions within the SDNP, and notably the Monarchs Way long distance trail, the landscape would be changed from one with an essentially rural character to one which is far more industrial. This potential for significant adverse impact on views experienced from the SDNP is confirmed by the Preliminary Environmental Information Report (PEIR).

Such adverse impact would be amplified by the cumulative impact of the this development with proposed battery storage site, solar farm and extension to the substation, all within this narrow finger of land extending into the SDNP.

While close to the existing Lovedean substation in an area associated with pylons and overhead lines, these features of this landscape would do little to mitigate the dominant adverse impact of the sheer size of the convertor halls on the immediate area and the wider landscape. Nor could it be much reduced by the mitigated measures suggested.

The immediate area includes pockets of ancient woodland, historic field boundaries, historic routes and farmsteads which should be protected. The impact on the SDNP and landscape of the local area would be amplified by any loss of these important features.

Noise from operation of the Convertor Station is also a serious concern in what, despite the nearby Lovedean substation, is a largely tranquil rural area. Electrical noise can carry over large distances and be disruptive to enjoyment of the countryside by the public. The Monarchs Way long distance trail passing nearby the proposed site, and giving access from the urban area of Horndean to the SDNP, is sensitive to any reduction in tranquillity. It is acknowledged in the PEIR that operational noise has the potential for adverse effects.

The resulting significant adverse impact on landscape character, visual amenity, and tranquillity of the SDNP would be contrary to the first national park purpose, and so significantly compromise the purpose of designation of the SDNP. It would also be contrary to policies for the protection of local landscape, views and tranquillity contained in the newly adopted South Downs Local Plan, East Hampshire District and Winchester District Local Plans. Accordingly, for buildings of the sheer size proposed, this location almost surrounded by the SDNP and in fine East Hampshire countryside does not accord with either national or local planning policy. It is entirely inappropriate, despite the benefits available from connecting to the Lovedean substation. If, as is understood to be the case, buildings of this size are essential in technical terms, then another and more urban site needs to be found, even if this would involve additional expense at another substation to improve capacity to evacuate power, as has been done with other interconnector schemes.