


XLINKS MOROCCO-UK POWER PROJECT

Preliminary Environmental Information Report

**Volume 4, Appendix 2.1: Landscape, Seascape and Visual Resources Planning
Policy Context**

A large, stylized 'X' graphic composed of four geometric shapes (two triangles and two parallelograms) meeting at a central point. The shapes are colored in two shades of blue: a darker blue and a lighter blue. The graphic is positioned on the left side of the page, extending from the top to the bottom.

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Glossary

Term	Meaning
Alverdiscott Substation Connection Development	The development required at the existing Alverdiscott Substation site, which is envisaged to include development of a new 400 kV substation, and other extension modification works to be confirmed by National Grid Electricity Transmission.
Converter Site	The Converter Site is proposed to be located to the immediate west of the existing Alverdiscott Substation site in north Devon. The Converter Site would contain two converter stations (known as Bipole 1 and Bipole 2) and associated infrastructure, buildings and landscaping.
Converter station	Part of an electrical transmission and distribution system. Converter stations convert electricity from Direct Current (DC) to Alternating Current (AC), or vice versa.
Environmental Impact Assessment	The process of identifying and assessing the significant effects likely to arise from a project. This requires consideration of the likely changes to the environment, where these arise as a consequence of a project, through comparison with the existing and projected future baseline conditions.
Green infrastructure	Networks of green spaces and watercourses and water bodies that connect rural areas, villages, towns and cities.
Landfall	The proposed area in which the offshore cables make landfall in the United Kingdom (come on shore) and the transitional area between the offshore cabling and the onshore cabling. This term applies to the entire landfall area at Cornborough Range, Devon, between Mean Low Water Springs and the Transition Joint Bay inclusive of all construction works, including the offshore and onshore cable routes, and landfall compound(s).
Landscape character	A distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse.
National Landscape	An area of land designated for its natural features of outstanding beauty. The land is protected by the Countryside and Rights of Way Act 2000, in order to conserve and enhance its natural beauty. Previously referred to as an Area of Outstanding Natural Beauty.
National Policy Statement(s)	The current national policy statements published by the Department for Energy Security and Net Zero in 2023.
Onshore HVDC Cable Corridor	The proposed corridor within which the onshore High Voltage Direct Current cables would be located.
Preliminary Environmental Information Report	A report that provides preliminary environmental information in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. This is information that enables consultees to understand the likely significant environmental effects of a project, and which helps to inform consultation responses.
Proposed Development	The element of the Xlinks Morocco-UK Power Project within the UK, which includes the offshore cables (from the UK Exclusive Economic Zone to landfall), landfall site, onshore Direct Current and Alternating Current cables, converter stations, road upgrade works and, based on current assumptions, the Alverdiscott Substation Connection Development.
Proposed Development Draft Order Limits	The area within which all offshore and onshore components of the Proposed Development are proposed to be located, including areas required on a temporary basis during construction (such as construction compounds).
Visual amenity	The overall pleasantness of the views people enjoy in their surroundings, which provides an attractive visual setting or backdrop for the enjoyment of activities of the people living, working, recreating, visiting or travelling through an area.
Xlinks Morocco-UK Power Project	The overall scheme from Morocco to the national grid, including all onshore and offshore elements of the transmission network and the generation site in Morocco (referred to as the 'Project').

Acronyms

Acronym	Meaning
AONB	Area of Outstanding National Beauty (now National Landscape)
HVDC	High Voltage Direct Current
NGC	National Grid Company
NL	National Landscape (formerly AONB)
NPPF	National Planning Policy Framework
NPPG	National Planning Policy Guidance
NPS	National Policy Statement
PEIR	Preliminary Environmental Information Report
PPG	Planning Practice Guidance
UK	United Kingdom

Units

Units	Meaning
km	kilometre

1 LANDSCAPE, SEASCAPE AND VISUAL RESOURCES PLANNING POLICY CONTEXT

1.1 Introduction

- 1.1.1 This document forms Volume 4, Appendix 2.1: Landscape, Seascape and Visual Resources Planning Policy Context of the Preliminary Environmental Information Report (PEIR) prepared for the Xlinks Morocco-UK Power Project (the 'Project'). For ease of reference, the UK elements of the Project are referred to as the 'Proposed Development', which is the focus of this PEIR. The PEIR presents the preliminary findings of the Environmental Impact Assessment process for the Proposed Development.
- 1.1.2 This document sets out details of the local planning policy used to inform the Landscape, Seascape and Visual Impact Assessment.

1.2 Policy Context

National Policy Statements

Overarching National Policy Statement for Energy (EN-1) (2023)

- 1.2.1 National Policy Statement (NPS) EN-1 sets out national policy for the energy infrastructure which affects decisions made by the Secretary of State for the Department of Energy Security and Net Zero.
- 1.2.2 NPS EN-1 Part 5, covers generic landscape and visual impacts. Paragraph 5.10.5 reiterates the point that virtually all nationally significant infrastructure will have an impact on the landscape. As this is the case projects should be designed carefully "*the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.*"
- 1.2.3 Paragraphs 5.10.7 confirms that nationally designated landscapes have the highest protection in relation to landscape and scenic quality. There are specific statutory purposes attached to the designation. The conservation of natural beauty of the landscape and countryside should be given substantial weight in these areas.
- 1.2.4 Paragraph 5.10.7 explains that nevertheless, the Secretary of State may grant development consent in nationally designated areas, under exceptional circumstances if the development is in the public interest. The landfall and part of the cable corridor lie within the North Devon Coast National Landscape. However, the cable corridor will be underground and once construction is completed, the landscape features will be reinstated as close to the original location as the engineering requirements allow.
- 1.2.5 Paragraph 5.10.8 states that '*the duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for projects*

outside the boundaries of these areas which may have impacts within them. In these locations, projects should be designed sensitively given the various siting, operational, and other relevant constraints. The Secretary of State should be satisfied that measures which seek to further the purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development.' The landfall, Onshore HVDC Cable Corridor and construction compounds are set within and adjacent to the North Devon Coast National Landscape. However, the impacts associated with these elements would be temporary. The Converter Site, which will have permanent impacts on the landscape and on views, are located approximately 7.3 km from the boundary of the National Landscape at the closest point. Paragraph 5.10.34 explains that *'The fact that a proposed project will be visible from within a designated area should not in itself be a reason for the Secretary of State to refuse consent.'* Paragraph 5.10.35, advises the decision-maker that the judgement to be made is *'whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project.'*

- 1.2.6 It is noted, at paragraph 5.10.36, that the Secretary of State, in reaching a judgement, will consider whether adverse effects are temporary, the landscape and visual impacts of the landfall, Onshore HVDC Cable Corridor and construction compounds will be temporary (predominantly during the construction phase). However, the impacts of the converter stations will be permanent, albeit reducing over time due to landscaping (e.g. creation of bunds and planting).
- 1.2.7 The decision-maker is also asked to consider whether the project has been designed carefully and in such a way to minimise harm to the landscape, including reasonable mitigation (paragraph 5.10.37). The scale and dimensions of the converter stations are dictated by the infrastructure they are housing. The buildings will be designed by an architect in liaison with landscape architects, to ensure as integrated a solution as possible.
- 1.2.8 The potential visual impact of energy infrastructure, relevant to the Proposed Development, is considered in paragraph 5.10.13 of NPS EN-1. It is recognised that *'All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites.'* However, in paragraph 5.10.14, states that the decision-maker is to judge *'whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project.'* Paragraph 5.10.15 notes that coastal areas are particularly vulnerable to visual intrusion, due to the potential for high visibility *'on the foreshore, on the skyline and affecting views along stretches of undeveloped coast.'* The landfall is, necessarily, on the coast and part of the Onshore HVDC Cable Corridor is in the coastal hinterland.
- 1.2.9 Paragraphs 5.10.26 to 5.10.28 of NPS EN-1 relate to mitigation, and make several suggestions. One such is to reduce the size and scale of a project. However, it recognises that this may result in a reduction of capacity, e.g., of electrical output. It also notes that *'Adverse landscape and visual effects may be minimised through appropriate siting of infrastructure within its development site and wider setting. The careful consideration of colours and materials will support the delivery of a well-designed scheme, as will sympathetic landscaping and management of its immediate surroundings.'* Off-site landscape mitigation may also be appropriate.

National Policy Statement for Electricity Networks Infrastructure (EN-5) (2023)

- 1.2.10 Part 2 Assessment and Technology-Specific Information, Section 2.6, notes at paragraph 2.1.2 that *'When evaluating the impacts of electricity networks infrastructure in particular, all of the generic impacts detailed in EN-1 are likely to be in play, even if only during specific phases of the development (such as construction), or at one specific part of the development (such as a substation).'*
- 1.2.11 The impacts of the Proposed Development at the landfall, along the Onshore HVDC Cable Corridor and construction compounds will be temporary. The impacts of the converter stations will be permanent. However, the scale and dimensions of the converter stations is dictated by the amount of power transmitted.

National Planning Policy Framework

- 1.2.12 The National Planning Policy Framework (NPPF) published in December 2023 sets out the Government's planning policy for England and how it expects that policy to be applied. The NPPF emphasises the importance of achieving sustainable development. The proposed Project will enable the transmission of 3.6 GW of renewable energy to be transferred from Morocco to the national grid, at the Alverdiscott Substation Connection Development to the south of the hamlet of Webbery Barton and west of the village of Alverdiscott. At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 10).
- 1.2.13 Section 2, paragraph 7 notes that: *"The purpose of the planning system is to contribute to the achievement of sustainable development."*
- 1.2.14 NPPF Section 2 Achieving sustainable development, paragraph 8, explains that to achieve this, the planning system has three objectives, economic, social and, c) an environmental objective, which is *"to protect and enhance our natural, built, and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy"*.
- 1.2.15 Paragraph 11 explains that *"plans and decisions should apply a presumption in favour of sustainable development."* For decision-taking this means d) granting permission unless:
- "i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed"*.
- 1.2.16 Footnote 7 lists those sites of particular importance. For landscape these are: Local Green Space; National Landscapes; and National Parks. The landfall and part of the Onshore HVDC Cable Corridor lie within the North Devon Coast National Landscape.
- 1.2.17 NPPF Section 3 Plan-making, Strategic policies, paragraph 20 explains *"Strategic policies should set out an overall strategy for the pattern, scale, and design quality of places, and make sufficient provision¹¹ for:*

d) conservation and enhancement of the natural, built, and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation”.

- 1.2.18 Footnote 11 requires it to be in line with the presumption in favour of sustainable development. The Proposed Development is a project for the transmission of renewable energy.
- 1.2.19 Paragraph 28 explains that “*Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas*” ... “*This can include*” ... “*conserving, and enhancing the natural and historic environment and setting out other development management policies.*”
- 1.2.20 Paragraph 32 explains that “*Significant adverse impacts on these [economic, social, and environmental] objectives should be avoided and wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).*”
- 1.2.21 Any form of development will have an impact on character and potentially on views. The Proposed Development would have an impact wherever it was. The location of the landfall and cable route are dictated by the availability of a suitable grid connection and by the properties of the land and the cables themselves. The scale and dimensions of the converter stations are similarly dictated by the electrical infrastructure they house.
- 1.2.22 NPPF Section 14 Meeting the challenge of climate change, flooding and coastal change, paragraph 160 explains that “*help increase the use and supply of renewable and low carbon energy and heat, plans should:*
provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts).”
- 1.2.23 Paragraph 163 states that “*When determining planning applications for renewable and low carbon development, local planning authorities should:*
approve the application if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.”
- 1.2.24 Section 14 is also concerned with the changing climate, coastal change and flood risk. The North Devon and Somerset Shoreline Management Plan Review - Final Plan Summary notes that Area 2 Hartland Point to Westward Ho! (policy units 7c03 to 7c05) within which the landfall lies, is at very little risk of erosion or flooding and the long-term plan is to allow the coast to evolve naturally along much of its length. The Onshore HVDC Cable Corridor passes underneath the River Torridge, at Area 4 Taw/Torridge Estuary (policy units 7c11 and 7c13) and will not affect the management plans for these policy units. The proposed works at the landfall and along the Onshore HVDC Cable Corridor during the construction phase is appropriate development in landscape and visual terms (NPPF, paragraph 173).
- 1.2.25 NPPF section 15, paragraph 180, requires that “*Planning policies and decisions should contribute to and enhance the natural and local environment by:*

- a) *protecting and enhancing valued landscapes” ... “(in a manner commensurate with their statutory status or identified quality in the development plan).*
 - b) *recognising the intrinsic character and beauty of the countryside ...*
 - c) *Maintaining the character of the undeveloped coast...”*
- 1.2.26 Paragraph 181 explains “*Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.*”
- 1.2.27 NPPF, paragraph 182 requires that “*Great weight should be given to conserving and enhancing landscape and scenic beauty in” ... “Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues.*” The landfall and western part of the Onshore HVDC Cable Corridor, including some construction compounds are located within the North Devon Coast National Landscape. The NPPF adds that the scale and extent of development within such areas should be limited. Other than for developments in the public interest, major development in such areas should be refused (paragraph 183). What constitutes major development is a matter for the decision-maker, “*taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined*” (Footnote 64). It is of note that the impact of the landfall and the Onshore HVDC Cable Corridor is during the construction phase only, as they are both underground and any landscape elements that are removed due to open cut trenching installation, rather than drilling, will be replaced, either at the same location, or as close to the original location, as is physically possible, given the constraints of the scheme.
- 1.2.28 Paragraph 191 requires that “*Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation*”.
- 1.2.29 The strategic objectives relating the landscape and visual environment contained in the NPPF, summarised above, are reflected in local planning policy as reviewed in relation to North Devon and Torridge District, in **paragraphs 1.2.37 to 1.2.70**, above.

Planning Practice Guidance

- 1.2.30 The NPPF is supported by the Planning Practice Guidance (PPG) (DCLG, 2014) a web-based guidance resource that was introduced in 2014 in order to bring together existing planning practice guidance for England in an accessible and useable way. The Natural Environment section was updated in July 2019 and the Light Pollution section was updated November 2019. Only those sections of relevance to the Proposed Development are discussed below.

Natural Environment – Landscape (21st July 2019)

- 1.2.31 PPG at paragraph: 036 (Reference ID: 8-036-20190721) explains the NPPF requires that *'plans should recognise the intrinsic character and beauty of the countryside, and that strategic policies should provide for the conservation and enhancement of landscapes. This can include nationally and locally designated landscapes but also the wider countryside.'*
- 1.2.32 In the same paragraph, the PPG requires that where landscapes have a particular, local value planning policies should *'identify their special characteristics and be supported by proportionate evidence.'* In addition, *'Plans can also include policies to avoid adverse impacts on landscapes and to set out necessary mitigation measures...'* also *'The cumulative impacts of development on the landscape need to be considered carefully.'*
- 1.2.33 In the same paragraph, the PPG refers to using Landscape and Visual Impact Assessments to demonstrate the likely effects of a Proposed Development on the landscape. The baseline character and the likely landscape and visual effects are assessed in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the PEIR.

Light pollution (1st November 2019)

- 1.2.34 The PPG explains that factors that are relevant when considering when light shines, are: considering turning off or dimming light to minimise visual impact on humans, flora, and fauna (paragraph: 004 Reference ID: 31-004-20191101).
- 1.2.35 Factors relevant to how much the light shines are considered (paragraph: 005 Reference ID: 31-005-20191101). Factors include, necessity, amount, glare, the colour of the light, as well as who and/or what might be affected by it. The ecological impacts of light are also considered (paragraph: 006 Reference ID: 31-006-20191101).

Local Development Framework

- 1.2.36 The local development framework is made up of a number of documents. The application will be determined with consideration to the North Devon and Torridge District Local Plan (adopted 2018). Those policies of relevance to assessing landscape and visual matters are detailed below.

North Devon and Torridge Local Plan 2011-2031

- 1.2.37 The onshore elements of the Proposed Development Draft Order Limits are situated within the district of Torridge, North Devon. Therefore, the relevant local policies are set out in the North Devon and Torridge District Local Plan 2011-2031.
- 1.2.38 Relevant North Devon and Torridge policies regarding the Proposed Development and potential impacts on landscape character and visual receptors are set out below.

Section 2 Spatial Planning Vision

- 1.2.39 Paragraph 2.1 states *'The overarching principle supporting the Local Plan in northern Devon is to contribute to the achievement of sustainable development. It is the intention of the Councils to enable the delivery of infrastructure, jobs, accessible local services and housing for future generations while supporting the world-class environment of the [North Devon] Biosphere Reserve.'*
- 1.2.40 Paragraph 2.9 of the Local Plan explains that the spatial implications and opportunities arising from the North Devon Biosphere Reserve in which the Proposed Development Draft Order Limits lies, include *'enhancing green infrastructure networks at a landscape scale.'*
- 1.2.41 One of the key Challenges is noted as *'Protecting the high quality natural environment and the coastal environment in particular, is vital and underpins tourism. Future development must be sensitive to the area's environmental assets and ensure that the local character, distinctiveness and environmental quality is not eroded but where possible enhanced as a consequence of development.'* (Local Plan paragraph 2.21, point (i)). Point (j) explains that another key challenge is *'Delivering necessary development, while minimising the impact on the environment and responding to the implications of climate change.'*
- 1.2.42 Strategic Aim 2 is A World Class Environment – *'where important assets are valued and enhanced for future generations'*. Objective (a) is the protection and enhancement of the coastline, estuarine and important countryside assets.

Section 3 Sustainable Development

Policy ST01: Principles of sustainable development

- 1.2.43 This policy is concerned with the planning balance when considered against the policies of the National Planning Policy Framework (NPPF). This consideration is undertaken in the Planning Statement. The environmental role of local planning policy is to continue to protect and enhance northern Devon's unique natural, built and historic environment (North Devon and Torridge Local Plan, paragraph 3.1). However, it is useful to note here that the Proposed Development is a renewable energy project of national importance.

Policy ST02: Mitigating climate change

- 1.2.44 The policy requires that development makes a positive contribution to the environmental sustainability of northern Devon and minimise its environmental footprint, by *'(b) conserving and enhancing the natural, built and historic environment through the prudent use of key resources including land, buildings and energy, whilst protecting and enhancing the area's biodiversity, geodiversity, landscape, coastline, air, water, archaeology and culture.'* Point (d) is also relevant as it refers to *'promoting opportunities for renewable and low-carbon energy generation whilst conserving and enhancing the natural and built environment.'*
- 1.2.45 Paragraph 3.5 sets out the legally binding UK Government's targets for a cut in greenhouse gas emissions. Note: These have since been revised.

Policy ST03: Adapting to climate change and strengthening resilience

- 1.2.46 The policy requires that new development, be designed and constructed to take account of the impacts of climate change. This includes at point (j) conserving and enhancing landscapes, including cross-boundary infrastructure links, improving habitat connectivity.
- 1.2.47 Local Plan, paragraph 3.23 notes that the North Devon Biosphere Reserve Buffer Zone (essentially the National Landscape in landscape terms, which the cable corridor crosses) is a continuous area of conservation management, where only activities of compatible with the conservation objectives can take place. The wider transition zone, in which the Onshore HVDC Cable Corridor and the converter stations are located, a more sustainable use of the environment is promoted.

Policy ST04: Improving the quality of development

- 1.2.48 The policy requires that development will achieve high quality design, responding to the characteristics of the site, its wider context and the surrounding area.
- 1.2.49 While this policy is primarily about residential development a few principles are applicable to the Proposed Development. The explanatory text requires that new development should be visually interesting and complement their landscape (Local Plan, paragraph 3.26). Within the North Devon Biosphere Transition Zone innovative approaches will be encouraged (paragraph 3.29).

Section 4 Spatial Strategy

- 1.2.50 The spatial strategy map (Local Plan, Figure 4.2) identifies where Policy ST09: Coast and estuary strategy applies. The Onshore HVDC Cable Corridor crosses this Coastal and Estuarine Zone. Within the zone, new development '*will be supported where it does not detract from the unspoilt character, appearance and tranquillity of the area...and is required because it cannot reasonably be located outside the Undeveloped Coast and estuary*' (point (7)). The policy requires that the '*continuity of the South West Coast Path and Tarka Trail will be protected and a network of connecting routes be improved*' (point (11)).
- 1.2.51 The explanatory text notes that the Marine Management Organisation is responsible for consenting offshore projects (Local Plan, paragraph 4.38). Key characteristics of the seascape are set out in the North Devon and Exmoor Seascape Character Assessment (Land Use Consultants, 2015). These characteristics are considered in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the PEIR. The explanatory text to the policy notes that the '*undeveloped parts of this coastal zone area finite resource and their unspoilt character, appearance and tranquillity will be protected against development not related to the coast, or not providing benefits for the local community*' (paragraph 4.39).
- 1.2.52 The spatial strategy section of the Local Plan introduces the North Devon Biosphere Reserve, together with its constituent parts (paragraph 4.40).
- 1.2.53 Paragraph 4.47 notes that the main beaches are a focus for recreation. The South West Coast Path provides access along the whole of the northern Devon coastline and connects to the Tarka Trail and other parts of the public right of way network (paragraph 4.48). The Onshore HVDC Cable Corridor crosses underneath a pebbly beach and the South West Coast Path at the landfall. It also

crosses under the River Torridge, where it also passes under the Tarka Trail. Paragraph 4.49 of the Local Plan refers specifically to renewable energy *'Impact on proposed mitigation on environmental and heritage assets from the landfall of offshore renewable energy generation will need to be balanced against potential social, environmental and economic benefits, recognising the national and/or international importance of some environmental assets.'*

Section 6 A World Class Environment

Policy ST14: Enhancing environmental assets

- 1.2.54 The policy requires that the *'quality of northern Devon's natural environment will be protected and enhanced by ensuring that development contributes to: I conserving the setting and special character and qualities of the Northern Devon Coast Areas of Outstanding Natural Beauty...'; '(f) ensuring development conserves and enhances northern Devon's local distinctiveness including its tranquillity, and the setting and special qualities of Exmoor National Park including its dark night skies; (g) protecting and enhancing local landscape and seascape character, taking into account the key characteristics, the historical dimension of the landscape and their sensitivity to change;'* and *'(h) recognising the importance of the undeveloped coastal, estuarine, and marine environments through supporting designations, plans and policies that aim to protect and enhance northern Devon's coastline...'*
- 1.2.55 Local Plan, paragraph 6.2 also notes that Ancient Woodland and ancient trees are important environmental assets. As they are irreplaceable, they are deemed to be 'critical environmental capital' and should not be lost (paragraph 6.5).
- 1.2.56 Paragraph 6.6 notes that the North Devon Coast National Landscape is a nationally important landscape. The councils have a duty to conserve and enhance the National Landscape's natural beauty (section 85 of the Countryside and Rights of Way Act). The same paragraph notes that the setting and inland areas of the National Landscape contribute to its special qualities. The setting of these designated areas is also highlighted as important in paragraph 6.11.
- 1.2.57 The tranquillity of the rural areas, away from the main towns is noted at paragraph 6.8. It is noted that tranquillity is part of northern Devon's character, which includes dark night skies without light pollution.
- 1.2.58 The North Devon Biosphere Reserve, within which the Proposed Development is located, is described in paragraph 6.14.

Policy ST16: Delivering renewable energy

- 1.2.59 The policy notes at (3) that *"renewable and low carbon energy"..."will be supported in the landscape character types where: (a) landscape sensitivity is best able to support them, assessed in accordance with the Councils' Landscape Sensitivity Assessments and by the landscape's sensitivity to accommodate the scale of development; (b) there is no significant effect on local amenities; and (c) the special qualities of nationally important landscape...designations and their settings are conserved or enhanced."* The policy also notes that *"renewable and low carbon energy will be supported where it can demonstrate that the cumulative impact of operational and proposed development on the landscape character does not become a significant or defining characteristic of the wider fabric, character and quality of the landscape."* While the Proposed Development is not a renewable energy generating project, it is the infrastructure required for

transmitting a nationally important amount of renewable energy. Local Plan paragraph 6.28 notes that the landfall and onshore infrastructure impacts will also be considered.

- 1.2.60 The explanatory text recognises that renewable energy developments can impact on the natural environment. Landscape and visual impacts, including on perceptual qualities, such as tranquillity, as well as the effects on the dark night skies should be assessed (paragraph 6.26).
- 1.2.61 Paragraph 6.27, explains that cumulative impacts of existing operational, consented and developments should be assessed and suitable mitigations measures proposed to minimise impacts on landscape quality, and “*demonstrate that cumulative impact does not become a significant or defining characteristic of the wider landscape*”, “*including across different landscape character types.*”
- 1.2.62 The sensitivity of the districts’ landscape character types to accommodate renewable energy developments is set out in the Joint Landscape Character Assessment for North Devon and Torridge (LUC, 2011) (paragraph 6.29) including cumulative impacts. Paragraph 6.30 notes that locations for renewable energy development will need to conserve key environmental assets (see Policy ST14, above).

Section 13 Development Management Policies

Policy DM01: Amenity considerations

- 1.2.63 Policy DM01 explains that development “*will be supported where (a) it would not significantly harm the amenities of any neighbouring occupiers or uses.*”
- 1.2.64 The explanatory text at Local Plan paragraph 13.3 (b) is concerned with light intrusion, explaining that “*poorly designed lighting can result in the spillage of light into the countryside, impact on residential amenities and increase sky glow.*” The need to minimise unnecessarily obtrusive lighting, by design is highlighted.

Policy DM02 Environmental protection

- 1.2.65 The prevention of light pollution is also raised in this development management policy. Point (2) (d) explains that development will be supported if it does not result in unacceptable impacts to “*light pollution (sky glow, light intrusion, and light spillage), where light overspills on to areas not intended to be lit. Areas particularly sensitive to light pollution include tranquil areas of open countryside, in particular areas of nature conservation value and Exmoor National Park’s Dark Sky Reserve.*” The onshore elements of the Proposed Development Draft Order Limits crosses and is situated within a rural area, but is not located in or near Exmoor National Park or the Dark Sky Reserve.

Policy DM04 Design principles

- 1.2.66 This policy explains that good design should: (a) be sympathetic to setting in terms of scale, density, massing height, layout and landscape features; (b) reinforce the key characteristics and special qualities of the area in which the development is proposed; (d) contribute positively to local distinctiveness; and, (f) retain and integrate existing landscape features. The dimensions of the converter stations are dictated by their function, as is the width of the Onshore HVDC Cable Corridor.

Policy DM08A: Landscape and seascape character

- 1.2.67 The policy requires development to be: (1) *“of an appropriate scale, mass and design that recognises and respects the landscape character of both designated and undesignated landscapes and seascapes; it should avoid adverse landscape and seascape impacts and seek to enhance the landscape and seascape assets wherever possible.”* The sensitivity and capacity of the landscape/seascape asset should be considered, using the Landscape and Seascape Character Assessment for North Devon and Torridge, and should include cumulative impacts.
- 1.2.68 Point (2) of the policy is concerned with development within or affecting the setting of the North Devon Coast National Landscape or affecting the setting of the Exmoor National Park. While the Proposed Development Draft Order Limits is outside the Exmoor National Park and its setting, the proposed Onshore HVDC Cable Corridor passes through the North Devon Coast National Landscape, albeit underground. New development in this area should have regard to its statutory purposes, including the conservation and enhancement of landscape character and natural beauty. Development will not be permitted where it conflicts with or compromises the statutory purposes of the landscape designation.
- 1.2.69 Point (3) is concerned specifically with development within or affecting the setting of the National Landscape, noting that development should not compromise the ‘North Devon Coast AONB Management Plan’. Major development within the National Landscape will be refused, unless it can be demonstrated that the development is in the public interest as set out in national policy. The landfall and part of the Onshore HVDC Cable Corridor cross the National Landscape. During construction, work at the landfall and along the Onshore HVDC Cable Corridor would be visible, but during operation all works will be underground. The Converter Site is not within the National Landscape, nor within its setting. The Proposed Development is a nationally important development.

Policy DM09: Safeguarding green infrastructure

- 1.2.70 The policy states that development involving the loss of green infrastructure will only be supported where (a) equivalent, alternative green infrastructure is provided, or (b) the existing network of green infrastructure can be retained or enhanced. There will be a temporary loss of hedgerows where the Onshore HVDC Cable Corridor crosses hedgerows/other environmental assets in trenches (open cut) rather than drilled beneath them. The hedgerows/other environmental assets will be reinstated once the cables have been installed. The converter stations are proposed to be situated within agricultural fields. Existing vegetation and landscape features around the boundaries of the fields will be retained and additional planting is proposed, both in the immediate vicinity of the converter stations, and in the adjacent fields, as part of the landscape mitigation, building on landscape features, e.g., woodland adjacent to the Converter Site boundary.

Supplementary Planning Documents and Technical Evidence

Substations and the Environment: Guidelines on Siting and Design – the ‘Horlock Rules’ (National Grid Company plc.)

- 1.2.71 These guidelines form the National Grid Company plc’s (NGC) policy statement on the potential environmental effects of electrical substations as part of the development of energy infrastructure. Whilst not a NGC substation, the Proposed Development includes converter stations and will be part of the national electrical infrastructure, providing electricity to the national grid.
- 1.2.72 Section I, Paragraph 3 explains that the document details the approach taken to mitigate the effects of substation development. Paragraph 5, notes that in considering siting and design of substations, the most appropriate solutions will be achieved.
- 1.2.73 Section II NGC’s Approach to Design and Siting of Substations, Paragraph 6 sets out NGC’s environmental policy of giving due regard to protecting and enhancing the environment, to keeping known adverse effects to a reasonably practicable minimum, by taking reasonable steps to mitigate the effects of its proposals.
- 1.2.74 Section III Guidelines, Paragraph 1, Overall System Options and Site Selection, requires consideration to be given to environmental issues at the earliest stage, to keep adverse effects to a reasonably practical minimum.
- 1.2.75 Paragraph 2, Amenity, Cultural or Scientific Value of Sites, advises that developments should seek to avoid altogether internationally and nationally designated areas of the highest amenity, cultural and scientific value.
- 1.2.76 With regards to areas and features of local value, Paragraph 3 requires that *‘important existing habitats and landscape features including ancient woodland, historic hedgerows, surface and ground water sources and nature conservation areas should be protected as far as is reasonably practicable.’*
- 1.2.77 Paragraph 4, Local Context, Land Use and Site Planning, advises that the siting of substation, extensions and associated proposals *‘should take advantage of the screening provided by land form and existing features and the potential use of site layout and levels to keep intrusion into the surrounding areas to a reasonably practicable minimum.’* The proposed converter stations are located on a sloping site, and it is proposed to make use of cut and fill to create a landform that would in part screen these.
- 1.2.78 The guidelines require proposals to keep visual effects to a reasonably practicable minimum (Paragraph 5). The notes advise allowing sufficient space for screening of views by mounding or planting. The notes also advise the use of security measures which minimise visual intrusion from lighting. As the proposed converter stations and security fencing are to be set into the hillside, with planting around, and on, the proposed landform, potential light pollution will be kept to a minimum.
- 1.2.79 The design of the converter stations/substations and ancillary buildings should be given early consideration, and be appropriate to individual locations, seeking to keep effects to a reasonably practicable minimum (Paragraph 7). The notes advise that:

- preference should be given to low-profile structures and silhouettes that are appropriate to the background (Note 1).
 - Use light-weight materials (Note 2).
 - Commission exterior design and colours appropriate to the surroundings (Note 3).
 - Materials and colours for buildings, equipment and fencing should be chosen to harmonise with local surroundings (Note 4).
 - Where possible site buildings to act as visual screens for switchgear (Note 6).
- 1.2.80 Paragraph 8 is concerned with using land effectively, limiting the area of development, whilst allowing enough space for appropriate mitigation measures, to minimise adverse effects on existing land use and public rights of way.
- 1.2.81 *'The design of access roads, perimeter fencing, earth-shaping, planting and ancillary development should form an integral part of the site layout and design to fit in with the surroundings'* (Paragraph 9).
- 1.2.82 Appendix A: NGC Substations – Environmental Report, sets out what an environmental appraisal of proposals for substations should contain. Section 1 lists the information required to describe the project at the construction phase and during the operational and maintenance phase. Section 2 requires a description of the site and its environment, as well as the relevant policy framework. Section 3 requires an assessment of effects on the surrounding area and landscape, this includes visual effects, effects of lighting and indirect effects. Section 4 lists mitigation measures, that might be taken to avoid, reduce or remedy those effects, including:
- a) *'site planning.*
 - b) *Technical measures e.g., ... containment (e.g., shielding of transformers and bunding).*
 - c) *aesthetic and ecological measures e.g.*
 - *mounding, design, colour, landscaping, tree planting*
 - *measures to ... create alternative habitats*
 - *measures to safeguard historic buildings or sites.'*
- 1.2.83 The guidance contained within the Horlock Rules has been adopted during the design of the development and the landscape, seascape and visual resources chapter (Volume 4, Chapter 2 of the PEIR) includes those matters relevant to the assessment of the effects on landscape and visual resources.

Climate Emergency Declarations

- 1.2.84 Devon County Council declared a climate emergency on 21 February 2019. Torridge District Council declared a climate emergency on 1 July 2019. North Devon District Council declared a climate emergency on 24 July 2021.

British Energy Security Strategy

- 1.2.85 The British Energy Security Strategy (HM Government, 2022) recognises that green grids, interconnectors between different countries, transmitting renewable

energy will form part of the UK's energy security strategy (International delivery, page 27). This is discussed in more detail in the Planning Statement.

North Devon Coast National Landscape

- 1.2.86 The North Devon Coast AONB Management Plan 2019 to 2024, sets out the objectives and policies for the National Landscape, for the duration of the five-year plan. Some of which are potentially in tension with the policies contained in the NPPF and the NPSs. Those that have the potential to be relevant to the landscape and visual impacts of the Proposed Development are set out below.

Landscape and Seascape

- 1.2.87 The overarching landscape and seascape objective is to conserve and enhance the natural beauty and special landscapes of the National Landscape. Policies A1 to A5 set out the requirements to achieve this. Policy A1 is concerned with ensuring that the landscape character, natural beauty and special qualities of the National Landscape are conserved, enhanced and fully respected in all decisions affecting the National Landscape. Policy A2 is concerned with preserving the dark skies, peace and tranquillity of the National Landscape. Policy A3 requires both onshore and offshore developments to take account of open views, wilderness and maritime connections. Policy A4 recommends that no development takes place inside or outside the National Landscape that would harm the natural beauty and special qualities of the National Landscape. Policy A5 is to ensure that developments comply with the North Devon landscape and seascape character assessments.

Planning Development and Infrastructure

- 1.2.88 The overarching objective is to ensure that the planning process and infrastructure development protects and enhances the designated National Landscape and its special qualities. Policy I1 requires that planning policies and guidance must conserve and enhance the natural beauty and special qualities of the National Landscape. Policy I2 is concerned with promoting and enhancing local distinctiveness. Policy I4 is concerned with protecting and enhancing the marine and coastal environment.

Neighbourhood Development Plans

- 1.2.89 The landfall, the Onshore HVDC Cable Corridor and the converter stations do not currently lie within any of the North Devon Neighbourhood development plans; however, the Onshore HVDC Cable Corridor may temporarily be seen during the construction period from Bideford Civil Parish, which has a neighbourhood development plan.