

PLANNING / CONSENTS

**THE NATIONAL GRID ELECTRICITY TRANSMISSION (LITTLE HORSTED
SUBSTATION CONNECTION) COMPULSORY PURCHASE ORDER 2022**

SUMMARY STATEMENT OF EVIDENCE

**David Conway
Associate Director
RSK Environment Limited**

1. **QUALIFICATIONS AND EXPERIENCE**

- 1.1 My name is David Conway and I am an Associate Director at RSK Environment Limited (RSK). I completed a Masters in Town and Regional Planning at Leeds Metropolitan University in 2008, becoming a chartered member of the Royal Town Planning Institute in 2011.
- 1.2 Since January 2021 I have been on part-time secondment as a consultant consents officer within the National Grid Electricity Transmission Plc (NGET) national consents team. My consenting workload is diverse and includes new infrastructure work, asset replacement and site protection projects.
- 1.3 I provide further details of my relevant experience in my statement of evidence.

2. **INTRODUCTION AND SCOPE OF EVIDENCE**

- 2.1 The scope and structure of my statement of evidence is set out in this section.

3. **DESCRIPTION OF THE LITTLE HORSTED SUBSTATION CONNECTION PROJECT**

The Development

- 3.1 The Project comprises three principle elements; the development of a new 400kV Grid Supply Point (GSP) substation; a new 132kV substation, and associated electrical connection works including modifications to the existing overhead line.
- 3.2 The new 400kV NGET GSP will lower the voltage of the electricity flowing through the existing 400kV Bolney to Ninfield 4VM overhead electricity line from 400kV (transmission) to 132kV (distribution). This will allow the new 132kV South Eastern Power Networks (SEPN) substation to connect to it. The new SEPN substation will connect via 132kV underground cables to their Lewes substation, although this connection element is outside the scope of the Project.

Plot 35 (The substation site)

- 3.3 The land required for construction of the new 400kV NGET GSP substation and 132kV SEPN substation (Plot 35) is approximately 9.7 hectares in area, located approximately 2km to the south of Uckfield and approximately 1.7km to the east of Little Horsted. Plot 35 sits entirely within the administrative boundary of Wealden District Council, East Sussex.
- 3.4 Plot 35 consists predominantly of agricultural and equestrian land with wooden fenced boundaries. It contains no nature conservation or heritage designations and is not within any nationally designated landscape areas.

Need for the development

- 3.5 NGET’s regulatory duties in relation to developing, operating and maintaining an economical and efficient National Electricity Transmission System (NETS) include considering impacts upon communities, landscape, visual amenity, cultural heritage, and ecological resources. In order to ensure that the NETS adequately reflects the needs of its users, it requires continual renewal and adaptation incorporating both the maintenance and replacement of existing equipment and the development of new infrastructure to reflect changing patterns of power supply and demand.
- 3.6 In November 2016 SEPN made a connection request to NGET for a GSP at Little Horsted, which was modified in July 2019 due to increased forecast demand in the Lewes/Newhaven area.

4. PLANNING POLICY SUPPORT FOR THE PROJECT

National Policy Statements

- 4.1 For the Project, the National Policy Statement (NPS) for Energy (NPS EN-1) (**CD A17**), and the NPS for Electricity Networks Infrastructure (NPS EN-5) (**CD A18**), were considered to be material considerations. Between September and November 2021 the Government published and consulted on draft replacements (**CD A21 and A22**).

National Planning Policy Framework

- 4.2 The National Planning Policy Framework¹ (**CD A19**) (“NPPF”) (July 2021) was a material planning consideration when assessing and determining the Project’s planning application.

Local Development Plan

- 4.3 The statutory development plan comprises the Wealden District Core Strategy Local Plan² (**CD B2**) (“WDCSLP”) (February 2013) and saved policies of the adopted Wealden Local Plan³ (**CD B1**) (“WLP”) (1998).

¹ MINISTRY OF HOUSING, COMMUNITIES & LOCAL GOVERNMENT (2021), National Planning Policy Framework. [Online] Available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

² WEALDEN DISTRICT COUNCIL (2013) Core Strategy Local Plan, Wealden District (incorporating Part of the South Downs National Park). [Online] Available from: https://www.wealden.gov.uk/UploadedFiles/Adopted_Core_Strategy_2013_for_web.pdf

³ WEALDEN DISTRICT COUNCIL (1998) Adopted Local Plan, Index of Saved Policies. [Online] Available from: http://www.wealden.gov.uk/UploadedFiles/Index_of_Saved_Policies.pdf

4.4 The Project is in accordance with the provisions of Government guidance as well as those policies of relevance within the statutory Development Plan and the National Planning Policy Framework.

5. **OVERARCHING CONSENTS STRATEGY**

Consideration of Environmental Impact Assessment (EIA)

5.1 Wealden District Council ("Council") issued an EIA Screening Opinion on 31st July 2020, concluding the Project to be non-EIA development. The Project was re-screened in January 2021 with the Council again advising the Project to be non-EIA.

6. **PLANNING POSITION**

6.1 The consents required for the Project include full planning permission (**CD C5**) as well as the use of permitted development rights and exemption from S37 consent. Further detail is provided within section 5 of my statement of evidence.

7. **CONSIDERATION OF ALTERNATIVES**

7.1 Commencing in 2018, NGET undertook an appraisal of potential sites on which to accommodate the Project. This identified a 2km search diameter (the study area) extending from the existing 400kV pylons 4VM058 to 4VM080 of the Bolney to Ninfield overhead line, sufficiently close to SEPNs 132kV Lewes substation to make the underground connection between the two substations economically and technically viable.

7.2 A desk study was undertaken to identify environmental and socio-economic constraints and land use information which was mapped using GIS. Publicly available aerial photography was used in the site identification while a planning appraisal was also undertaken.

7.3 NGET determined that the indicative capital cost of establishing a 132kV connection into each site, and the need for additional 400kV infrastructure, were considered to be differentiators when selecting preferred siting options.

7.4 It was assumed that an area of land approximately 10 acres in size would be required to house the required substation equipment, access road and periphery landscape works that may be required for screening, as well as providing an area for future SEPN expansion, should this be required.

7.5 A long-list of twenty-three potential locations was established and assessed further through site visits. This led to ten potential sites being shortlisted: six original sites identified by UKPN, plus four of the additional locations identified. These were Sites 1-6 and Sites D, J, M and Q.

- 7.6 In January 2019 the options appraisal was re-visited to appraise the impact of revised plot boundaries and in July 2019 a change in design, due to SEPN's increased forecast demand in the local area, necessitated an increase in the number of SGTs from two to four. This required an increase in site area from 10 acres to 26 acres .
- 7.7 A review of the suitability of the existing options resulted in the following shortlist of sites being taken forward for further appraisal: UKPN sites 1, 3 (Plot 35) and 5 and options appraisal sites D, K, N, Q, X and Y.
- 7.8 In November 2020 the updated options appraisal of shortlisted sites assessed each prospective location against the range of identified Horlock Rules **Error! Bookmark not defined.** (CD F2) criteria. The appraisal process concluded that Sites 3 (Plot 35) and Y represented the emerging preferred options.
- 7.9 Further comparison established a preference for Site 3 which avoids the construction of new access track infrastructure between the site and the public highway, which would have increased the potential for environmental effect (such as landscape, ecology and archaeology). Further technical and cost consideration did not identify any significant changes. Further environmental work was undertaken on Site 3 (Plot 35) to support a planning application (Ref. WD/2021/0733/MAJ).

8. **CONSULTATION UNDERTAKEN**

- 8.1 NGET met with Council officers during pre-application to discuss the Project and also undertook consultation exercises with local parish councils and residents as part of its community engagement. During determination statutory consultees and Council officers raised no objection subject to the imposition of appropriate conditions.

9. **MITIGATION MEASURES**

- 9.1 Appropriate mitigation was secured through Planning Permission (Ref. WD/2021/0733/MAJ) (CD C5) by way of conditions which are in the process of being discharged.

10. **CONCLUSIONS**

- 10.1 There is planning policy support for the Project in terms of complying with the adopted Local Plan and the key benefits that will arise from the Project are in accordance with NPS EN-1, EN-5, and their draft replacements.

- 10.2 The Project will contribute to maintaining essential infrastructure for electricity supply beyond the boundaries of the district and thus provide significant public benefits. In addition to ensuring security of supply in Lewes/Newhaven area, the Project will form an integral part of the UK's wider electricity network and provide energy reliably whilst ensuring security of supply.
- 10.3 The primary consent for the Project is in place following the grant of the planning permission. In addition, NGET is able to make use of its permitted development rights as a statutory undertaker, and exemptions under Section 37 of the Electricity Act.
- 10.4 An options appraisal process has been undertaken demonstrating how NGET has been able to balance technical, socio-economic, environmental and cost considerations to help inform decisions around alternative Project options. In complying with the approach established for sensitive siting of such infrastructure under the Horlock Rules this has helped to identify site 3 (Plot 35) for the new NGET GSP substation.
- 10.5 Appropriate consultation has been undertaken with the Council, statutory consultees and community, while environmental reporting has led to the proposal of suitable mitigation measures.
- 10.6 No objections received have challenged the need for the Project, the process of site selection or consideration of reasonable alternatives undertaken by NGET. No alternatives have been put forward that the Council warranted further investigation, nor has it been suggested that there remains any consenting or permitting impediment to the project being realised.
- 10.7 In my view, there are no physical or legal impediments to the delivery of the project.

11. **DECLARATION**

- 11.1 This statement of evidence has been prepared and provided for this inquiry and given in accordance with the guidance of the Royal Town Planning Institute. I further confirm that the opinions expressed are my true and professional opinions.



David Conway

17 November 2022